BEYOND COMPLIANCE IN THE HOTEL SECTOR:

A REVIEW OF UK MODERN SLAVERY ACT STATEMENTS

Minderoo Foundation's Walk Free Initiative
WikiRate
Business & Human Rights Resource Centre
Australian National University
2019

WALK FREE
MINDEROO FOUNDATION
WikiRate
Business & Human Rights Resource Centre
Australian National University
ANU COLLEGE OF LAW

ABOUT THIS REPORT

Documenting the impact of new legislative acts, and company responses to them, is an indispensable tool for improving the effectiveness of legislation and advancing business practice. This is why Minderoo Foundation's Walk Free Initiative and WikiRate partnered in 2016 to assess the modern slavery statements produced under the 2015 UK Modern Slavery Act. In 2018, we launched the project's initial findings to move beyond compliance by providing an analysis of the content of the statements being produced, as well as drawing attention to promising, and less promising, business practice. In doing so, we aimed to unlock the content of these statements and share the metrics we developed to assess business activities to combat modern slavery. The report is available here.

Since January 2019, we have shifted our approach to focusing on specific sectors. With an estimated 12,000-17,000 UK-based companies having to publish statements per annum, a sector-specific approach allows us to provide a more tailored analysis of the statements and their quality, and to develop recommendations of what constitutes a strong statement and good business practice. This is the first report since we adopted this approach and it focuses on the hotels sector. The statements assessed in this report are available on the Business & Human Rights Resource Centre registry.

Walk Free, WikiRate Australian National University and Business & Human Rights Resource Centre conducted this analysis. Special thanks goes to Hayley Blyth, Carly-Ann Selby-James, and Daniel Wei-En Kang, student members of the ANU-Walk Free-WikiRate Modern Slavery Reporting Project and their supervisor Jolyon Ford, as well as Sydney Strelau, a WikiRate volunteer. Your engagement and contributions were essential to this study.

CONTENTS

EXECUTIVE SUMMARY

The travel and tourism industry continues to see uninterrupted growth, with more people than ever before travelling for work or leisure to a broader range of destinations. Yet this growth brings with it a greater risk of modern slavery.

There is a high-risk of exploitation within the hotel sector due to its vulnerable workforce, complex supply chains with little transparency, and limited oversight from brands and multinational hotel companies as a result of extensive franchising. In the franchising model, hotel brands lend their name and customer care standards to third parties, but usually stipulate far less about the standards they expect for the employment of workers, even in countries where abuse is endemic.

To assess how the hotel sector is responding to these risks, this report reviews the statements produced by 71 hotel companies under the UK Modern Slavery Act, which requires companies with a turnover of £36 million to release annual statements on their anti-slavery efforts. We looked at whether the statements meet the Act's minimum requirements, but also if they go "beyond compliance" with effective responses to modern slavery risks — including sexual exploitation, forced labour, and the poor treatment of migrant workers.

This report finds that reporting by hotels demonstrates they are failing to address the risks of modern slavery in their direct operations and supply chains. Four years into the Act, we would expect that hotels, operating in a high-risk sector, would produce more detailed disclosure and demonstrate a much better understanding of the well-publicised risks in the sector. However, the findings show a disappointing lack of effort to protect against labour and sexual exploitation. Tellingly, only a small number of companies explicitly state the Act has resulted in activities to combat modern slavery. (See Key Findings).

These failures can be explained by a lack of commitment by hotel companies to prioritise the elimination of modern slavery, and the weakness of the legislation to change corporate behaviour and hold laggard companies to account.

The hotel industry as a whole should reflect on the specific risks facing the sector and strengthen partnerships to share good practice. Hotel companies should strengthen their due diligence processes to more effectively identify and mitigate risks to prevent severe exploitation. They should be more transparent and disclose incidents or risks of modern slavery and the steps taken to remedy these.

The UK Government should show greater leadership by strengthening their requirements for corporate transparency, and holding companies to account that fail to comply with the law. It should release to the public a list of those who are required to report in order to facilitate analysis and enforce the Act against non-compliant companies.

The hotel industry as a whole should reflect on the specific risks facing the sector and strengthen partnerships to share good practice

Housekeeping staff are a particularly vulnerable group to modern slavery. In 2015, a Guardian investigation found that when outsourced, housekeeping staff working at a London hotel had their contract taken over by another company and became vulnerable to exploitative working conditions. Their quotas were changed from being paid £6.50 per hour to clean 13 rooms within eight hours to cleaning 15-17 bedrooms in seven and a half hours a day. Other workers were paid piecemeal amounts of between £2.30 and £3.75 to clean each room. Photo credit: Motortion/Adobe Stock

As mandatory reporting requirements, such as the Australian Modern Slavery Act, and mandatory human rights due diligence are established in other countries, it is important that existing legislation is strengthened and enforced. The UK should reform the Act, its implementation, and enforcement to ensure it regains leadership in the elimination of modern slavery. Without effective implementation and a renewed commitment from business to combat modern slavery, the estimated 16 million people in forced labour in the private economy remain at risk.

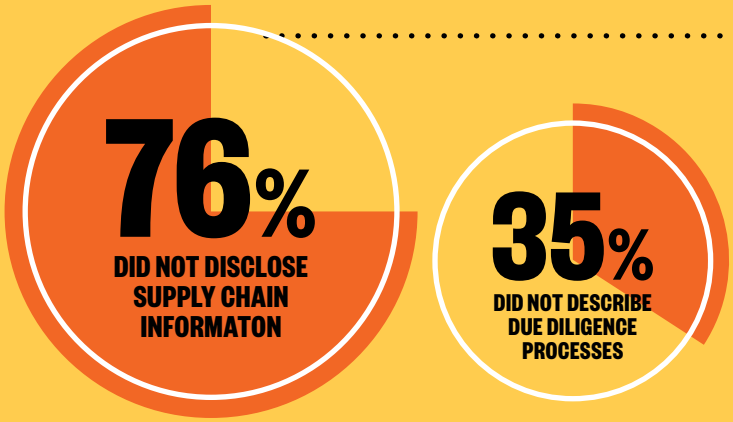
KEY FINDINGS

HOTEL COMPANIES ARE FAILING TO ADDRESS THE SPECIFIC RISKS OF MODERN SLAVERY IN THEIR DIRECT OPERATIONS AND SUPPLY CHAINS.

FEW COMPANIES ARE TACKLING THE SPECIFIC RISKS TO MIGRANT WORKERS.

Only 6/71 assessed companies (8%) reported that workers do not pay recruitment fees and related costs, so reducing their vulnerability to debt bondage.

SUPPLY CHAINS IN THE HOTEL SECTOR REMAIN OPAQUE AND WORKERS IN THEM VULNERABLE.



Companies that did neither include Apex Hotels, Firmdale Hotels, and Parkdean.

EXPLOITED AND VULNERABLE WORKERS ARE NOT BEING SUPPORTED.

None of the companies' statements described remediation plans for exploited workers.

18%
IDENTIFY MIGRANT/AGENCY WORKERS AS A SPECIFIC RISK

FEW HOTELS ARE TACKLING THE RISK OF SEXUAL EXPLOITATION ON THEIR PREMISES.

ONLY **14%** of statements (n=10) reported specific approaches to dealing with the risk of sexual exploitation in their operations and supply chains.

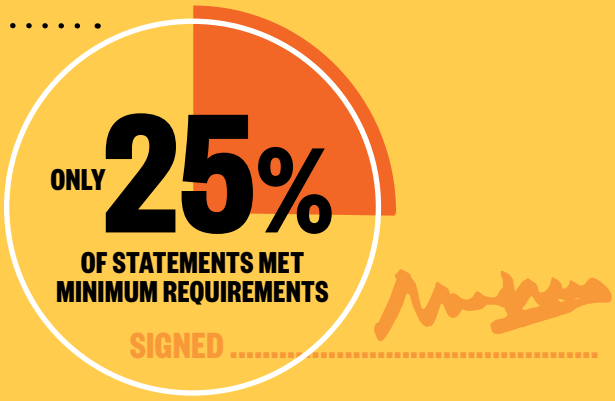
THE FAILURE TO ADDRESS RISKS REVEALS A LACK OF COMMITMENT BY HOTEL COMPANIES AND THE FAILURE OF THE LEGISLATION TO DRIVE CHANGE IN CORPORATE BEHAVIOUR OR HOLD COMPANIES TO ACCOUNT.

No statement described taking clear and concrete steps to address all the criteria as set out by the UK Modern Slavery Act and the accompanying UK Home Office guidance.

NO STATEMENTS COULD BE FOUND FOR SEVEN COMPANIES, NOR WERE THEY CLEARLY OR EXPLICITLY INCLUDED IN A GROUP STATEMENT:

Accor UK Business Leisure Hotels Limited, Capital Hill Hotels Group London Ltd, Four Seasons Hotels and Resorts, Indian Hotel Company, Jumeirah Group, Mandarin Oriental Hyde Park Ltd, and Sir Richard Sutton Limited. This is as of 15th November 2019.

The minimum requirements of the Act are that the statement was signed by a Director or similar senior authority, approved by the Board, and placed on a prominent place on the homepage of the company's website.



RECOMMENDATIONS FOR HOTEL COMPANIES PRODUCING STATEMENTS

Implement due diligence with a focus on sector specific risks

- The hotel sector would benefit from reflecting on the specific risks associated with:
  - Franchising as opposed to risks for managed or owned hotels,
  - Migrant workers — including discrimination, barriers to justice, inability to form or join unions, recruitment fees and withholding of passports,
  - Sex trafficking — especially use of hotels as a site of exploitation,
  - Sexual harassment of female employees in hotels, and
  - Inadequate national labour laws of many countries that do not enshrine international standards set out in the UN Guiding Principles on Business and Human Rights.
- Establish due diligence processes that demonstrate duty of care for vulnerable workers to:
  - Vet suppliers before entering into contractual relationships,
  - Drive continuous improvement with suppliers and third-party property owners,
  - Implement and monitor corrective action plans to address and remedy non-compliance, and
  - Engage directly with workers and trade unions, to empower workers, and learn from their insights on modern slavery in the supply chain.

Engage in pre-competitive collaboration with peers

- Engage with peers to drive higher common standards in operations and supply chains, such as the International Tourism Partnership and their Principles on Forced Labour, the Stop Slavery Hotel Industry Network, ECPAT's Code of Conduct, Shiva Foundation's Blueprint, and the developing Gangmasters and Labour Abuse Authority's hospitality protocol.
- Share good practice and reflect the likely reality that modern slavery affects their hotels and supply chains.

Improve transparency

- Disclose specific incidents of modern slavery and steps taken to remedy these.
- Facilitate analysis of their statements by stakeholders by:
  - Clearly stating which legal entities and brands their statement applies to,
  - Including the financial year to which it refers and the date stamp of when the statement was produced, and
  - Providing historic records of their statements to facilitate year-on-year review.
- Review the UK Home Office guidance and requirements of the Act to ensure they are meeting the minimum requirements.

RECOMMENDATIONS FOR UK GOVERNMENT

- Publish a list of companies required to report under the UK Modern Slavery Act.
- Create or nominate a body to monitor corporate compliance with the UK Modern Slavery Act similar to the business engagement unit created by the Australia Modern Slavery Act to:
  - Assist companies on how to undertake robust due diligence, and
  - Produce better disclosure and higher quality statements.
- Bring the Registry of corporate compliance statements into the UK Home Office, or similar government department.
- Implement its principles for nations to tackle modern slavery in supply chains (developed alongside the US, Australia, New Zealand and Canada) and encourage business by:
  - Setting clear expectation for the private sector on their responsibility to conduct appropriate due diligence,
  - Provide tools and incentives to the private sector to encourage meaningful action and public reporting of their efforts including through programmes, policies or legislation, and
  - Publish sector-specific guidance that addresses risks by region and workforce.
- Enforce the Act against non-compliant companies through the injunction mechanism set forth in the Act and consider financial penalties as recommended by the Independent Review.

Phuket, Thailand, 23rd August 2014. A migrant worker carrying some cushions at a hotel in Phuket. Every year hundreds of tourists come to Thailand. But in the shadow of mass tourism, there is a different reality. Reporters have found serious grievances among migrant workers in hotels used by tourists. Photo credit: Jonas Gratzer/LightRocket via Getty Images.

RISKS OF MODERN SLAVERY IN THE HOTEL SECTOR

The travel and tourism industry continues to grow. International tourist arrivals have shown uninterrupted growth from 25 million in 1950 to a predicted 1.8 billion by 2030.[1] The industry is becoming increasingly important for socio-economic development, particularly for emerging markets, due to the increasing diversification in the places tourists visit.[2] The hotel and hospitality sector employs 292 million people worldwide (one in 10 people globally) and contributes 10.2 percent of global GDP.[3]

Given this growth, it is vital that the industry, and specifically the hotel sector, address the risks of modern slavery. In 2016, there were an estimated 40.3 million people in modern slavery. Of these individuals, 16 million were in modern slavery in the private sector,[4] some of whom are exploited in hotels directly or in the production of goods and services in hotel supply chains.

There are three risk factors[5] which make the hotel industry susceptible to modern slavery:

1. Staff employed directly or indirectly becoming victims of forced or bonded labour

Hotels employ those who experience more structural disadvantages to accessing the market — women, young people, rural populations, and migrant workers,[6] and, in some countries, members of minority communities — who are also the groups at risk of exploitation and modern slavery. These risks include charging of recruitment fees, contract deception, withholding or reduced wages and benefits, retention of identification documents, and poor worker living accommodation.[7] A recent media report in Australia found that workers at a luxury hotel group were threatened with legal action and fines if they spoke to the media following revelations that migrant workers were being charged overpriced rents, with no option to find their own accommodation, and working up to 12 hours a week as unpaid overtime.[8] Similar reports were found in Scotland, where Bangladeshi workers were trafficked with promise of a new life and high salaries working in restaurants, but ended up exploited in a remote hotel,[9] while a study of reported trafficking cases identified in the US hotel sector found instances of wage and working hour abuse, contract fraud, wrongful termination, discrimination, unsafe or unsanitary working conditions, and verbal abuse.[10]

Hotels are at risk of modern slavery due to a vulnerable workforce, complex supply chains, and limited brand oversight

HOTELS MUST ADDRESS THE SPECIFIC RISKS FACING THE SECTOR AND THE UK GOVERNMENT MUST ENFORCE THE MODERN SLAVERY ACT AGAINST NON-COMPLIANT COMPANIES

Those working in small and medium-sized enterprises, in particular, experience low union density, low wages, low levels of skill requirements, shift and night work, and seasonality. These individuals are often women, representing some 50 to 70 percent of workers in the sector, who are additionally subject to poor working conditions, inequality, stress, and sexual harassment.[11]

Beyond direct employees, hotels are associated with taxi and bus drivers, restaurant suppliers, tourist guides, and cleaning and housekeeping staff, among others. Many of these jobs are characterised by challenges such as long working hours, comparatively low pay, informality, and increased competition. For example, in 2015, a Guardian investigation found that when outsourced, housekeeping staff working at a London hotel had their contract taken over by another company and became vulnerable to exploitative working conditions. Their quotas were changed from being paid £6.50 per hour to clean 13 rooms within eight hours to cleaning 15-17 bedrooms in seven and a half hours a day. Other workers were paid piecemeal amounts of between £2.30 and £3.75 to clean each room.[12] As a result, workers were under pressure to do more work in less time for less pay, while the hotel they were cleaning was not held responsible for these exploitative conditions.

2. Use of hotel premises for forced sexual exploitation of adults and children.

Hotels can also be the venue or transit location for forced sexual exploitation of adults and children. In the US, there are reports of third parties renting rooms, "selling" victims, forcing victims into sexual acts for financial gain, or having victims meet potential clients in hotels.[13] A 2015 report by Polaris identified 1,434 cases of trafficking in hotels and motels in the US between December 2007 and February 2015. From these cases, 1,867 victims were identified, 92 percent of whom had experienced sex trafficking, five percent labour trafficking, and two percent had experienced both. Ninety-four percent were female.[14]

3. Products and services used by hotels being produced by forced or bonded labour, labour exploitation, or unethical labour practices.

Hotels have complex supply chains, which, like all supply chains, are vulnerable to forced labour. Larger hotel chains often have centralised procurement processes to negotiate global agreements for certain products, which are provided to all markets where the hotel brand operates. These products tend to be those with long shelf-lives, and those that can be shipped or manufactured worldwide and in high volume. Regional or local arrangements are made for perishable goods and low volume or one-off products.[15] Informal relationships between suppliers and hotels at the local level may not be subject to contracts, but are more ad hoc, temporary, or seasonal arrangements. Outsourced services, such as cleaning, housekeeping, and agency labour also tend to be negotiated locally. A heightened level of due diligence is needed to monitor and enforce high labour standards given the complex web of supplier relationships.

In the US, there are reports of third parties renting rooms, "selling" victims, forcing victims into sexual acts for financial gain, or having victims meet potential clients in hotels

A DIVERSE AND FRAGMENTED SECTOR

There has been a shift away from owned and operated hotels in recent years (see figure 1); increasingly, brands operate fee-based business models through management contracts and franchising, with estimates that less than 10 percent of hotels are owner-operated.[16] Eighty percent of hotels in the top 10 multinationals are franchises, which has led to large brand hotels becoming "marketing companies" and distanced from the hotel supply chain. This fragmented nature exacerbates known risks, making it difficult to determine who is responsible for respecting the rights of workers, with overlapping responsibility between hotel companies, third-party property owners, and suppliers.[17] This does not however diminish their responsibility to prevent exploitation of workers; the largest companies include portfolios that contain more than 6,000 hotels each and employ more than 150,000 employees in up to 100 countries.[18]

Figure 1: Four types of hotel ownership and risks[19]

Type	Description	Risk
Owned and operated	Gives the multinational hotel greatest level of control over the business. Brand owner makes decisions on staff, operational structure, and growth, and negotiates all supplier agreements and contracts.	● The multinational is directly responsible for ensuring that modern slavery does not occur in operations, at the hotel or in supply chains. ● Greatest direct exposure of the brand to modern slavery.
Leased properties	Similar to owned and operated, but the hotel building is leased from someone else, often on a long lease. Exposure to modern slavery is similar to owned and operated types.	● The multinational is directly responsible for ensuring that modern slavery does not occur in operations, at the hotel or in supply chains. ● Greatest direct exposure of the brand to modern slavery.
Managed properties	Hotel continues to be privately owned, but the multinational lends its brand name and takes over the overall operations, becoming the management company. Suppliers are negotiated by the management company, but contracts rest with owner.	● Level of direct risk is theoretically reduced. ● However, the multinational has limited oversight over contracts, which could lead to increased risk.
Franchised	Privately owned and usually operated by hotel owner or representative. Hotel pays an upfront fee to purchase the brand franchise and pays ongoing royalties.	● Level of direct risk to the brand is theoretically reduced. ● Establishing responsibility is complicated. ● Regardless of responsibility, hotel brand risk could be increased due to contradiction between hotel brand and owner ethics, or due to limited oversight.

The level of risk of modern slavery is high in the franchise model. It can be difficult for the franchisor to ensure that no modern slavery is occurring in the supply chains of their franchisee.[20] Franchisees may not share or implement the franchisor's ethical standards and practices and/or be based in regions where the rule of law is weak or modern slavery is more prevalent. There are difficulties in sharing risk and responsibility for labour abuses in a franchisees' operations and supply chain. For example, a franchisor may not wish to exert control over a franchisee so that it becomes liable for what occurs in the franchisees' operations.

The UK Home Office guidance explicitly states that it is the annual revenue of a franchisor that determines whether it meets the criteria to publish a modern slavery statement under Section 54 of the UK Modern Slavery Act and that the turnover of franchisees should not be used to calculate the franchisor's revenue. Contrast this with the applicability of the Act to parent companies, whereby turnover is calculated through the sum of all subsidiaries' revenue. By not coming within the scope of the legislation, hotel companies may be incentivised to franchise. However, taking this "arms-length" approach can increase the risk of modern slavery occurring. This distinction can also become meaningless when instances of modern slavery occur in a franchise that are automatically associated with the franchisor and its brand, causing reputational damage, regardless of their legal liability.[21]

The hotel sector in specific regions is particularly vulnerable to modern slavery. A recent report by Business & Human Rights Resource Centre (the Resource Centre) highlights how international hotel companies operating in Qatar and the United Arab Emirates are underprepared to prevent and remediate the human rights risks migrant workers face. This is further complicated by the Kafala (sponsorship) system, which leaves migrants workers tied to potentially unscrupulous employers.[22] In the report, 70 percent of the hotels in the assessed international companies' portfolios that responded to the Resource Centre survey operated as managed hotels, with employment contracts governed by third-party hotel owners. Therefore, responsibility for the rights of subcontracted workers in these properties were fragmented, making it more difficult to apply companies' human rights policies. The report found that migrants working in hotels were vulnerable to labour abuses including the payment of exorbitant recruitment fees leading to debt bondage, restrictions on freedom of movement, and lack of overtime payments.[23] Despite reforms to the Kafala system, and an announcement in October 2019 that the system will be abolished,[24] a report by the Guardian revealed migrant workers at a luxury hotel in Qatar paid high recruitment fees, worked three or four months without a day off, faced fines for falling asleep while on duty, and were paid below minimum wage. Security guards endured 12 hour shifts outdoors in temperatures that can reach 45 degrees Celsius but earned little more than £8 per day.[25]

In sum, the risks of modern slavery are high within the hotel sector due to a number of factors including vast, diverse and complex supply chains, the fragmented nature of franchising, the use of localised, informal purchasing agreements, seasonal and temporary working arrangements, and limited brand oversight. Despite these challenges, a strong case remains for action against modern slavery by the hotels sector beyond the moral obligation of preventing the exploitation of 40.3 million people in modern slavery. Investor groups are increasingly asking questions of a company's anti-slavery activities. Adopting ethical practices can build staff morale and operational efficiency, while strong prevention and mitigation efforts could alleviate very serious consequences for a company's reputation and business when cases of modern slavery are uncovered.[26] Governments are also increasingly legislating on modern slavery, such as the UK Modern Slavery Act,[27] and the Australian Modern Slavery Act,[28] which require businesses to disclose how they respond to the risk of modern slavery. There are multiple incentives for the hotels sector to take action to tackle the serious risks of modern slavery in their direct operations and supply chains.

The distinction between franchisor and franchisee can become meaningless when instances of modern slavery occur

METHODOLOGY

WHAT IS THE UK MODERN SLAVERY ACT?

Under Section 54 of the 2015 UK Modern Slavery Act, a commercial organisation that has an annual turnover of over £36 million and with operations in the UK must publish a slavery and human trafficking statement each financial year. The statement should set out the steps the company has taken to ensure there is no slavery or trafficking in its supply chains and its own business, or state that it has taken no such steps.

The legislation does not prescribe what these statements should include, but provides suggestions that the statement describe business structure and supply chains, relevant policies, due diligence processes, risk assessment and risk management mechanisms, training programs, and the means by which the company measure the effectiveness of these approaches. Guidance issued by the UK Home Office provides additional support for companies.

The project employs a citizen science approach, working with universities around the world, to review and assess over 900 statements

HOW IT WORKS

Using the suggested content under Section 54(5) of the legislation and the accompanying UK Home Office guidance, Walk Free and WikiRate developed 18 metrics (see Appendix 1) through which non-expert researchers could assess not only whether the statements meet the minimum requirements of the Act, but also if they detail policies and actions that go "beyond compliance" and enable businesses to improve their responses to modern slavery. After some initial testing and refining in collaboration with the University of Columbia, the project employed a citizen science approach to review and assess over 900 statements.

This report reviews statements produced by the hotel sector, which were assessed by students at Australian National University and the WikiRate volunteer community. Beyond the 18 metrics, the project included tailored metrics to assess disclosures specific to the hotel sector, for example, assessing company responses to the risk of sexual exploitation. We partnered with the Resource Centre who have extensive experience analysing modern slavery reporting and who provided sector-specific input related to the treatment of migrant workers.

To ensure the integrity of the data, every metric answer was reviewed by two ANU researchers. These researchers had the ability to request expert reviews of any ambiguous data, which were subsequently checked by the WikiRate team. All data gathered under the minimum requirements metrics and over a third of all other data were validated by WikiRate and Walk Free to ensure at least 90 percent data accuracy.[29]

Using WikiRate's export functionality, the data set was then analysed to establish disclosure patterns. This analysis and its methodology are available online: https://wikirate.org/Source_000089615.

WHICH STATEMENTS WERE IN SCOPE?

A total of 78 companies and 128 unique statements were reviewed covering the reporting period of 2016 to 2019. Seven of the 78 companies reviewed did not produce any statement at all.

Shifting to a sector-specific approach to analysing the statements required that we define the companies in scope of this project.

Figure 2: Criteria used to identify companies and statements

- A minimum of five letting bedrooms.
- A dining room, restaurant or similar eating area serving evening meals at least five days a week (but hotels that do not offer dinner and are located within easy walking distance of a choice of places to eat dinner, can also be rated under the hotel scheme as a metro or town house hotel, as long as this is made clear to all prospective guests in all marketing and all other hotel requirements are met).
- Hotel generally open seven days a week during its operating season.
- Proprietor and or staff available during the day and evening to receive guests and provide information, services such as hot drinks and light refreshments.
- A clearly designated reception facility.
- Meeting all the current statutory obligations and providing Public Liability insurance cover.
- Servicing of rooms seven days a week (this includes linen/towel change, removal of rubbish and cleaning).

Types of hotels included:

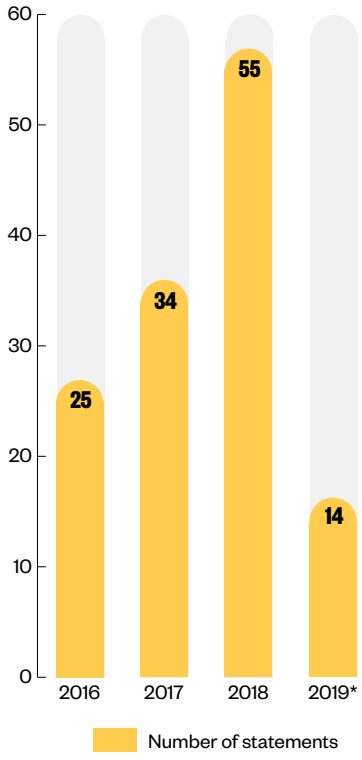
- Inn.
- Holiday Park.
- Resort.
- B&B.

The starting point was the statements housed on the Modern Slavery Registry and tagged as hotels, restaurants, and leisure. Any non-hotels were removed from this list after a review of their websites to ensure they met the selection criteria.

We periodically checked for statements for the seven hotels which we believe should have produced a statement and have yet to do so. The cut-off date was 15th November 2019, when statements had still not been found. While we have tried to be comprehensive, the fragmented nature of the hotel sector means that inevitably there may be some hotels that were in scope that we have missed. We welcome any hotels that should be included to share their statement with the Modern Slavery Registry.

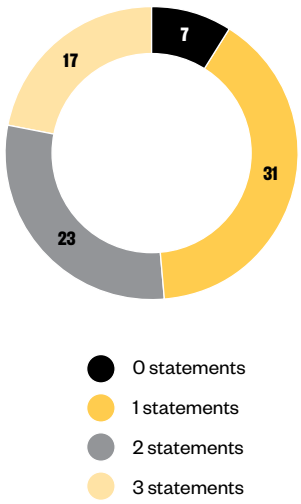
HOW MANY STATEMENTS?

Figure 3: Number of statements by year (/128)



* The reduction in 2019 likely relates to publication lag as this analysis was complete as of August 2019.

Figure 4: Number of companies producing multiple statements since 2016 (/128)



The legislation states that companies should release a statement for each financial year.[30] However, 40 percent of the companies assessed (n=31) published only one statement over the 2016-2019 period.

Company income fluctuates over time so companies may not have released a statement because in certain years they did not meet the £36 million p.a. threshold, rather than not being compliant with the legislation. Where there are gaps in reporting, it is not currently possible to distinguish between non-compliance or not meeting the threshold. While the UK Modern Slavery Act defines which companies have to produce a statement, the UK Government has not published a list of companies caught by the Act, leaving companies to determine if the legislation applies to them. The UK Home Office does have a list of companies in scope of the legislation, but it is not currently public.[31]

Encouragingly, the number of statements produced by the hotel sector has increased each year since 2016, which was the first reporting year for companies under the Act. These statements have been tagged by year according to the following logic: either the year that the statement applies to is specified in the statement, or the tagged year refers to the year in which the statement is found.

Over 50 percent of companies (n=40) reviewed have produced two or more statements since 2016. InterContinental Hotels Group, Millennium Copthorne Hotels, Shearings Leisure Group Limited, and VUR Village Trading No 1 Limited have released three statements to date. However, nearly 10 percent (n=7) of companies which meet the requirements of the Act had not released a statement at the time of this analysis or were not clearly or explicitly included in a group statement: Accor UK Business Leisure Hotels Limited,[32] Capital Hill Hotels Group London Ltd,[33] Four Seasons Hotels and Resorts,[34] Indian Hotel Company,[35] Jumeirah Group,[36] Mandarin Oriental Hyde Park Ltd,[37] and Sir Richard Sutton Limited.[38]

CHANGE OVER TIME

Measuring a company's progress over time is an important part of measuring the impact of the legislation, and we did hope to show change over time by comparing the action taken by the sector as a whole in 2019 as compared to 2016. However, this was made impossible by the multiple factors listed below.

In order to compare company reporting fairly, we have only reviewed a company's most recent statement, bringing the total number of statements reviewed in this analysis to 71. A full list of the reviewed companies and URLs to the statements can be found in Appendix 2.

1. **Companies are not reporting on the same time period.** Section 54 of the UK Modern Slavery Act states that the annual statement should cover each financial year for the organisation. However, the reporting period differs per company, with some reporting for April to April and others reporting per calendar year. It is therefore not possible to directly compare the content of the statements.
2. **Companies do not specify which financial year their statement applies to within the statement.** Guidance by the UK Government says statements should include the date of the company's financial year end, yet they often do not include dates and merely say the statement applies to the current financial year. This makes it impossible to know if this is the current statement or an out-dated version that has not yet been updated. Examples of this included the statements produced by The Celtic Manor Resort, Grange Hotels, Harbour Hotels, Dorchester Hotel Limited, and The Goodwood Estate Company Limited.
3. **Statements contain contradictory dates.** One statement may refer to different years and reporting periods within the same statement. Examples included statements produced by Shearings Leisure Group Limited, Soho House Holdings Limited, and Travelodge.
4. **Historic statements could not be found**. Often as statements are released, they replace previous versions online. The number of available historic statements is minimal, despite UK Home Office guidance that companies make statements from previous years available online.[39] Only seven companies have a historic archive of their statements on their website, namely Center Parcs Limited, Greene King, Hilton, InterContinental Hotels, Millennium Copthorne Hotels, Shiva Hotels, and TUI.
5. **Statements covering different years report the same information.** Statements covering differing years appear to be the same, but with an updated date. Others appear to be the same, but have removed dates from later versions of the same statements. It is therefore unclear if the statement is still relevant. Arora Hotels is one example that has almost identical statements covering multiple years.
6. **Multiple statements are available for the same year.** Some companies make edits to their statements after it is published. A statement from the same year can have multiple versions, which means that the assessment differs based on when in that year it is reviewed.
7. **Statements can cover future financial years.** There were instances when statements stated that they covered the next one or two years. While companies are encouraged to include their plans for the future, the legislation requires they report on the steps taken during the previous financial year. J D Wetherspoons states that their statement published in July 2018 covers the period 2018/2019.

It is not currently possible to show change over time for these statements

MINIMUM REQUIREMENTS

Figure 5: Number of statements that meet minimum requirements (/71)

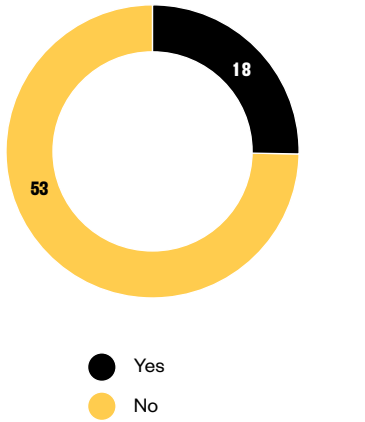
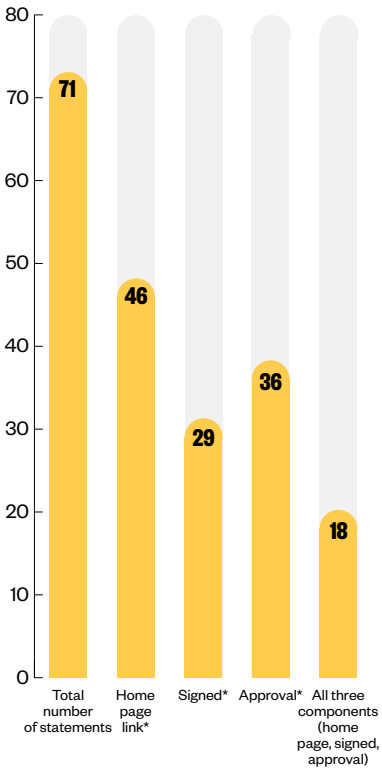


Figure 6: Number of statements describing components of legal compliance



*Not mutually exclusive – statements could include more than one component of legal compliance

Sections 54(4)(6) and (7) describe the minimum requirements for the UK Modern Slavery Act statements. According to the type of organisation, the statement must be signed by a Director or similar senior authority, and must be approved by the Board. If the organisation has a website, a link to the statement must be placed in a prominent place on the website homepage.[40]

Of the 71 statements assessed, only 25 percent (n=18) met minimum requirements. Although additional guidance was published in March 2019 stating that the statement did not have to be physically signed, we have applied the standard as outlined in the Home Office guidance. This low level of compliance is similar to other reports reviewing the statements.[41] Current compliance on the Modern Slavery Registry is 23 percent.[42]

We would expect to see a much higher rate four years after the Act came into force. Placing the statement on the homepage of a company's website was the most commonly executed component of the legislation, followed by signature by senior authority and explicit approval by the Board.

RECOMMENDATIONS

To meet the minimum requirements of the Act, the hotels sector must ensure the statements are:

- Signed by a Director or similar senior authority,
- Explicitly approved by the Board, and
- Made public by placing it on the company website and linking to it on a prominent place on the website homepage.

STRUCTURE, BUSINESS & SUPPLY CHAIN DISCLOSURE

The Act suggests that organisations disclose their structure, business, and supply chains.[43] This is an important area as it allows those assessing the statements to understand the boundaries of the statement and to support the identification of risk based on sector, organisational structure and group relationships, business model, the location of operations and supply chains, sourced goods and services, and relationships with suppliers and others, including trade unions.

Statements should include an explicit list of the brands, companies, or subsidiaries covered by the statement, which is critical given the complexity of hotels' ownership, management, and franchised models. Around 50 percent of the 71 statements (n=35) did not disclose any information on their business structure. The level of detail in the remaining statements ranged from a full list of subsidiaries, as shown in the Greene King plc statement, through to a brief description; InterContinental Hotels Group simply stated that: "IHG is one of the world's leading hotel groups, with more than 5,500 hotels in over 100 countries, and a diverse portfolio of 15 hotel brands."

A large part of the workforce within the hotel sector is comprised of vulnerable workers who have difficulty accessing safe and decent work. They are at a high risk of exploitation and therefore demographic information on such workers should be included in modern slavery statements. Only a third of statements (n=21) assessed disclosed information related to workforce. Much of this disclosure was about processes to monitor recruitment agencies, implying but not explicitly revealing awareness of risks using outsourced labour.

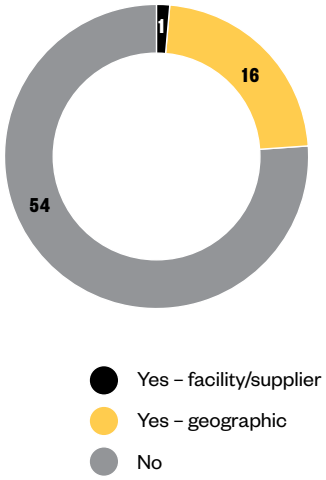
Several companies reported having systems in place to check workers' eligibility to work in the UK to avoid employment of persons working against their will. However, this was limited to UK-based operations and did not consider workers in operations or supply chains outside the UK.

Around 50 percent of the statements did not disclose any information on their business structure

Three quarters of the statements assessed did not disclose any information on their supply chains. Where information was provided, it was generally poor and lacking in detail, such as providing the geographic region where the suppliers are based, or goods are sourced. This lack of transparency on such a key reporting area fundamentally undermines the spirit of the Act.

Details on supply chains were limited in the statements. For example, the statement produced by D and D London Ltd stated: "We source food and non-food products from the UK and abroad. We currently buy from around 250 first tier suppliers who are material to our business and who in turn source their own ingredients, products and components in the UK and internationally." Hoburne Limited included: "Our main suppliers are all UK registered and many have a long history with us."

Figure 7: Number of statements that disclose information on their supply chains (/71)



Few companies name their suppliers. VUR Village Trading No 1 Limited disclosed more information than others, providing some details on the diversity of its business relationships including suppliers, contractors, and the franchised nature of the company. But it remains general and does not provide specific details: "We procure goods and services directly from over 1000 first tier UK based suppliers... We subcontract general maintenance and construction works services to a number of small providers... We employ the majority of our workforce directly; we have a small number of independent agents working for Village... We have two franchise arrangements operating within Village...."

RECOMMENDATIONS

To improve business and supply chain disclosure, statements produced by the hotel sector should:

- Explicitly name the subsidiaries and brands to which the statement applies,
- Publish the names of their tier 1 suppliers, at a minimum,
- Disclose what goods and services they source and from where so stakeholders can identify likely risks, and
- Provide full disclosure of the make up of their workforce and their trade union representation.

MODERN SLAVERY POLICIES

Section 54(5) of the legislation suggests that statements may include information on policies in relation to slavery and human trafficking. These policies "shape the environment and set the tone of an organisation in assessing, preventing and mitigating the risk of and working to influence and remedy modern slavery in their supply chains and organisation."[44]

The vast majority of statements reviewed (87 percent or n=62) included some mention of a policy related to tackling modern slavery in their business operations and supply chains.

One of the most commonly identified policies were those where companies stated that suppliers were requested to comply with relevant international and local laws. These policies are inherently weak as suppliers may be operating in locations where laws protecting human rights laws do not exist or are not enforced by authorities. Further, it places no responsibility on the hotel or supplier to implement internal policies or practices to protect workers. Another policy common among the hotels explicitly prohibited the use of forced labour by suppliers. However, for such a policy to be effective, hotels must monitor compliance and put in place corrective action plans when they are violated. Furthermore, policies must be supported with due diligence that involves continuous engagement with suppliers.

Concerningly, given the complexity of hotel supply chains and the fragmented nature of the hotel sector, of those statements that did disclose modern slavery policies, only 23 percent stated that these policies applied to beyond tier 1 suppliers (n=16) as opposed to their direct or tier 1 suppliers (65 percent or n=46).

Likewise, few companies (n=6) referred to the Employer Pays Principle in their modern slavery statement. Reflecting Principle 1 of the Dhaka Principles for Migration with Dignity, the Employer Pays Principle is a commitment that no worker should pay for a job, including fees charged to migrant workers. This is to reduce vulnerability to debt bondage and forced labour.

Figure 8: Number of statements mentioning any policy related to modern slavery (/71)

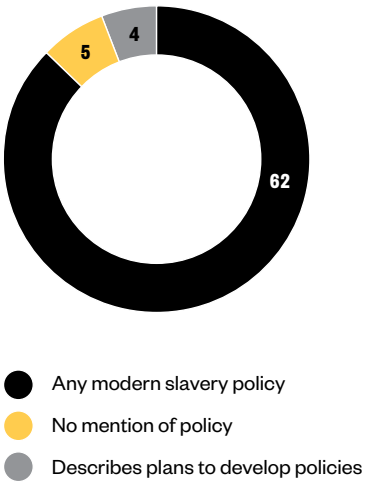
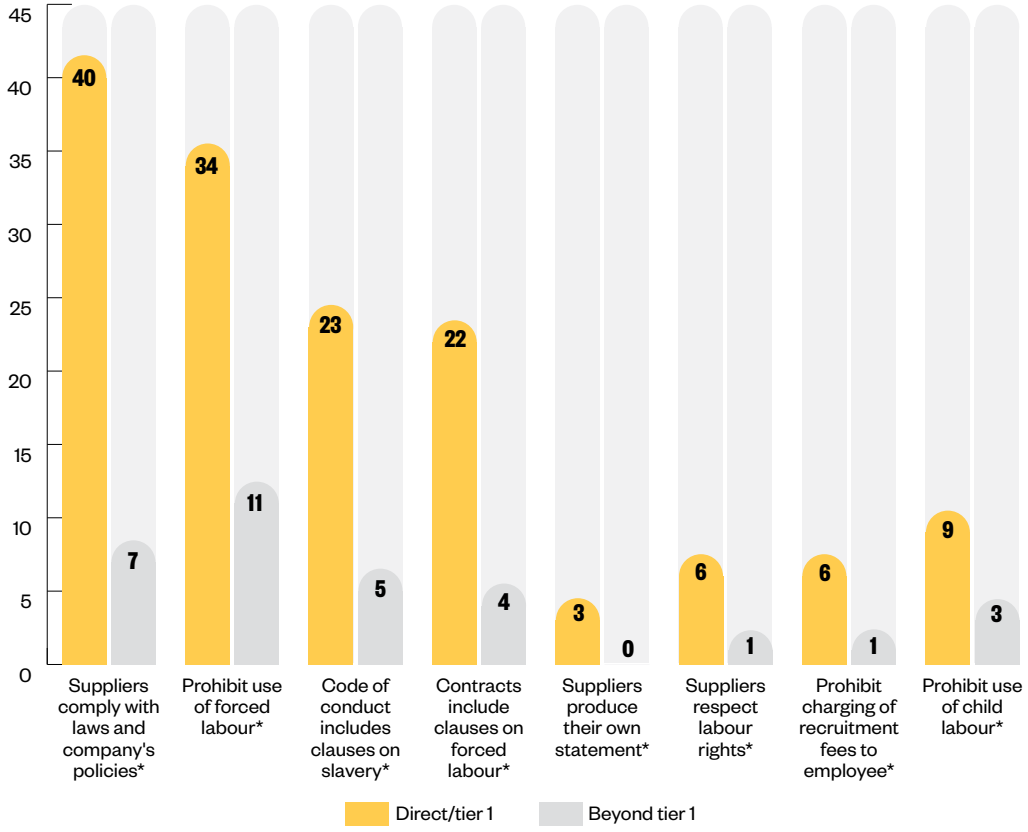


Figure 9: Number of statements describing specific modern slavery policies



*Not mutually exclusive – statements could include more than one policy

There were some examples of good practice regarding the specific vulnerabilities of agency labour to modern slavery. The Hilton Worldwide Holdings and Strand Palace Hotel and Restaurants Ltd statements outlined policies that prohibit recruitment fees, while the Rezidor group stated that:

- "Every employee has a worker contract
- No employee is forced to work
- No employee is forced to hand over government issued identification, passports, work permits or bank cards
- No employee is required to pay any worker fees to receive work
- No excessive deductions are made from employees' wages

These expectations include the practices of labor agencies and for outsourced labor suppliers."

RECOMMENDATIONS

To target policies to the specific vulnerabilities of the hotel sector, the hotel sector should:

- Have a policy on migrant workers,
- Have a policy on employer pays principle,
- Have a policy on use of ethical labour recruiters,

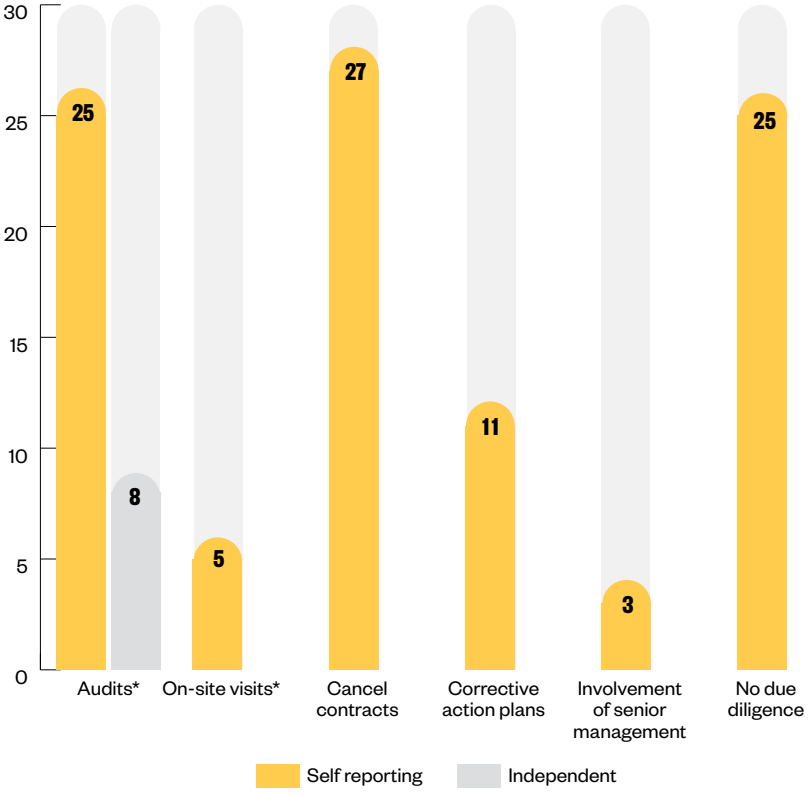
And include details on these policies in their modern slavery statements.

DUE DILIGENCE PROCESSES

The Act recommends that statements include information on due diligence processes. Human rights due diligence is a key concept in the UN Guiding Principles on Business and Human Rights (UNGPs). Due diligence processes should include "assessing actual and potential human rights impacts, integrating and acting upon the findings, tracking responses, and communicating how impacts are addressed."[45] These processes are not just assessing initial risk through questionnaires or having policies in place, but monitoring and responding to this risk through continuous engagement with suppliers.

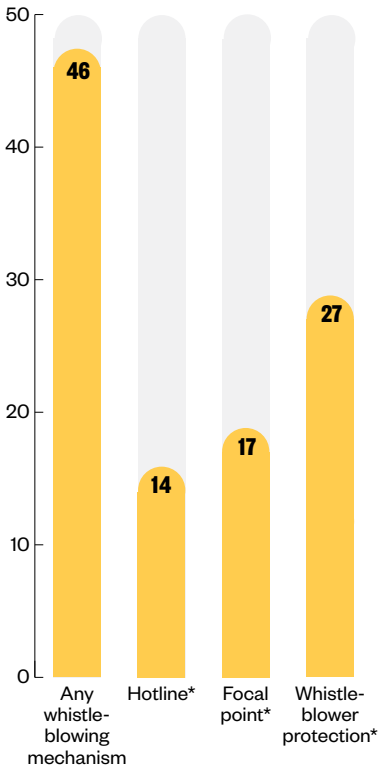
The hotels' statements were assessed on whether they continuously engage with suppliers, conduct audits and on-site visits, and put in place improvement plans or corrective action plans and remediation processes.

Figure 10: Number of statements describing due diligence processes



*Not mutually exclusive – statements could include more than one due diligence process

Figure 11: Number of statements disclosing whistleblowing mechanisms



*Not mutually exclusive – statements could include more than one way to deal with incidents

Beyond this, we also reviewed statements for any whistleblowing mechanisms and any recent incidents of modern slavery. Given that the risk of forced labour may continuously evolve, each of these processes is critical to responding to risk and reducing the vulnerability of direct employees and workers in hotel supply chains.

The results on due diligence were disappointing. Many hotels either did not report any current due diligence processes (n=25 or 35 percent), described cancelling contracts (n= 27 or 38 percent), or provided information on self-reporting or independent audit practices (n=27 or 38 percent).

Cancelling contracts when a risk or incidence is identified should be a last resort — simply cutting ties with a factory or supplier could increase the risk that workers are exposed to forced labour. The aim should be continuous engagement with suppliers, with the use and monitoring of action plans. For example, Shiva Hotels Plc describes the aim of their engagement plan as, "being communication, capacity building, and termination of relationship if criminal activity is in question." The statement released by Merlin Entertainment Plc described monitoring the plans, but also included information on terminating the business relationship if there was no improvement in line with the action plan.

Audits and compliance-driven approaches are unlikely to identify instances of forced labour by themselves. The UK Home Office guidance advises that "businesses seek to investigate working conditions with support from expert independent, third parties and civil society stakeholders, and hear from workers themselves about their working conditions."[46] Few statements included information on worker involvement in due diligence processes. Marston's, for example, audits agencies supplying staff to production and distribution sites twice a year. The audit includes making direct contact with a random sample of agency staff; however, this is for the limited purpose of confirming their terms of employment. No hotel disclosed that they actively engage directly with workers, trade unions, worker representatives or local NGOs, which would be best placed to raise awareness of labour issues faced by workers.

Sixty-five percent of statements (n=46) described having a whistleblowing mechanism, but no statement identified any incidents of modern slavery or related forms of exploitation. This does not mean that abuse is not happening. Most companies, including those in the hotel sector, will have experienced labour exploitation and forced labour either in their direct operations or supply chains. By not disclosing this information, companies are either not conducting thorough due diligence, and must review the effectiveness of their mechanisms, or are potentially hiding reports that have been made about these forms of exploitation.

Hotels should ensure their grievance mechanisms are accessible to workers. If many of the workers in the hotel sector are vulnerable groups, they must be able to easily access a mechanism and feel they can report abuse without fear of retaliation or questioning of their legal or work status. This may require the hotel to establish a number of mechanisms for different types of workforce that take into account obstacles for workers such as language barriers.

Few statements address the risk of sexual exploitation in hotels. Just eight percent of statements (n=6) disclosed they support the reporting of forced sexual exploitation to police. These hotels were Travelodge, Great Eagle Hotels UK Ltd, Hyatt Hotels Corporation, and Shiva Hotels Group LLP. Ten percent of statements (n=7) mentioned participation in partnerships directed at combatting sexual exploitation and trafficking, such as partnering with the National Society for the Prevention of Cruelty to Children (NSPCC), End Child Prostitution, Child Pornography and Trafficking of Children for Sexual Purposes (ECPAT), and Businesses Ending Slavery and Trafficking (BEST). Five hotels (Hilton, Hyatt, Marriott, TUI, and Accor) disclosed they have signed ECPAT's Code of Conduct to combat child sexual exploitation in the travel industry.

Industry and trade associations can provide companies with a platform to share challenges and experiences, guidance and best practice on how to address modern slavery. Six hotels (Hilton, Hyatt, InterContinental, Marriott, The Rezidor Hotel Group, and Whitbread) disclosed they are part of the International Tourism Partnership (ITP), an industry association that supports the principles outlined in the UN Declaration of Human Rights and the UNGPs. The ITP has developed a Human Trafficking Position Statement, a Know How Guide, and Guidelines for Checking Recruitment Agencies.[47] More recently the ITP has developed three key Principles on Forced Labour: that every worker should have freedom of movement, no worker should pay for a job, and no worker should be indebted or coerced to work.[48] The Gangmasters and Labour Abuse Authority is also in the process of establishing a hospitality protocol in collaboration with Shiva Foundation.

RECOMMENDATIONS

To improve due diligence processes, hotels should:

- Go beyond auditing to manage risks and integrate site visits,
- Engage directly with workers, trade unions, worker representatives and local organisations who have expertise on labour issues on the ground both in the development due diligence processes and when addressing modern slavery incidents,
- Ensure their grievance mechanisms meet the criteria set out in the UNGPs, particularly that they are accessible, and workers are aware of them,
- Develop specific processes to support those who may be sexually exploited or transited for sexual exploitation on hotel premises,
- Join existing partnerships to share good practice,

And include information on these processes in their statements.

FEW STATEMENTS ADDRESS THE RISK OF SEXUAL EXPLOITATION THAT CAN OCCUR IN HOTELS

Lima, Peru, 27th September 2019. Police officers stand guard outside a hotel where minors are forced into commercial sexual exploitation. The Special Operation 'Los Bastardos de Ceres' involved three raids, the detention of Narciso Chacon Zavala (34) and Abner Bryan Rojas Borja (20) and the rescue of a girl of 16. Photo credit: Manuel Medir/Getty Images.

RISK ASSESSMENT AND MANAGEMENT

Beyond responding to risks and incidents, companies should take action to prevent forced labour from occurring. The UK Home Office guidance states that assessing the nature and extent of exposure to risk will enable more targeted action to find it, remedy it, and prevent it from occurring in the future.[49]

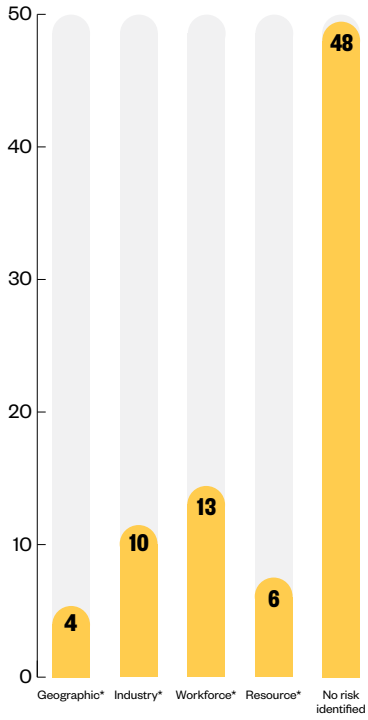
A disappointing 55 percent of the statements (n=39) did not describe currently using any risk assessment tool. Undertaking a risk assessment is the first step to identify risks and then prioritise how to address these; without tools and resources in place, any risk management strategies will be ineffective.

Company disclosure should be clear about the tools that are used to assess operations and supply chains to identify risks and whether the tools have been effective. Only 21 percent of the 71 statements (n=15) described both using a risk assessment tool and identifying a specific risk as a result of using that tool. For example, Whitbread disclosed that as a result of their risk assessment, including using SEDEX software, risk-based questionnaires, and conducting research, they identified high-risk industries, such as construction and food and beverage manufacturing. In some cases, it is not clear whether the risk is identified as a result of implementing the tool. For instance, Hand Picked Hotels, stated that they conduct "regular review of suppliers, their policies and by monitoring their online and media reputations," but did not link this to its disclosure that "risks arise from the use of foreign and migrant labour, and from supply chains both in the UK and overseas."

Where specific risks were identified these were described in very general terms, with limited detail. For example, of the three statements disclosing risks related to geographic locations, only Hilton identified the risks associated with the specific location of their hotels, stating that their priority should be "analysing our leased and managed hotels in Europe, Middle East and Africa (EMEA) with respect to human rights risks in labour outsourcing."

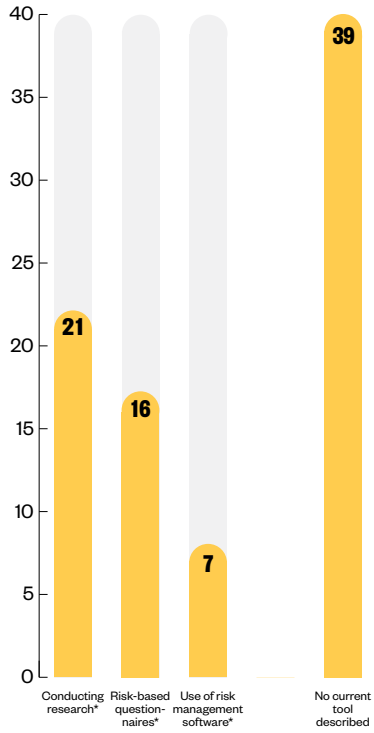
As examples of broad description of risks, Bannatyne Group Plc stated that higher risk suppliers would be those, "where clothes or textiles are produced abroad," or Grange Hotels which stated that "products or services sourced from outside the UK or EU are potentially more at risk of slavery or human trafficking issues."

Figure 13: Number of statements identifying specific risks



*Not mutually exclusive – statements could identify more than one type of risk

Figure 12: Number of statements describing a risk assessment tool



*Not mutually exclusive – statements could include more than one way to deal with incidents

We would expect to see more companies disclose risks related to workforce. Only 18 percent (n=13) of statements explicitly identified certain types of workforce as being high-risk. The statement produced by Maybourne Hotel Group is one of the few examples that identifies the risks associated with the use of foreign and migrant labour in supply chains in the UK and overseas.

Of the 71 statements assessed, 24 percent (n=17) identified sexual exploitation as a specific risk that hotels may face. Some businesses merely identified sexual exploitation as a potential form of modern slavery which may occur in their business or supply chains, such as Aprirose Limited and RBH Hotels. Only 14 percent of statements (n=10) reported specific approaches to dealing with the risk of sexual exploitation in their operations and supply chains. Hyatt Hotels and InterContinental, for example, acknowledged that the risk of sexual exploitation was increased as a result of international sporting events and that they had taken steps to create heightened awareness of human trafficking at such events.

Few hotels recognised the specific risks associated with the fragmented nature of the hotel sector. Millennium, for example, while not providing much detail, was explicit that the risks they face differ based on the model of operation, with the most control exercised over owned and managed hotels, where the company relies on "our Relevant Policies and related training and procedures to help manage the risks of slavery and human trafficking." With regard to franchising, management of hotels through joint ventures, and ownership of hotels which are managed by third-party operators, the statement disclosed that the company "may have very limited control or influence over our business partners."

RECOMMENDATIONS

To better target resources and respond to potential instances of modern slavery in their supply chains, hotels should:

- Map their supply chains to gain better visibility of their lower tiers in order to identify risks,
- Understand that risks will differ from region-to-region,
- Understand that risks will fluctuate based on events and seasonality,
- Focus on the vulnerability of their workforce when assessing risk,

And disclose this and the risks that have been identified in their modern slavery statements.

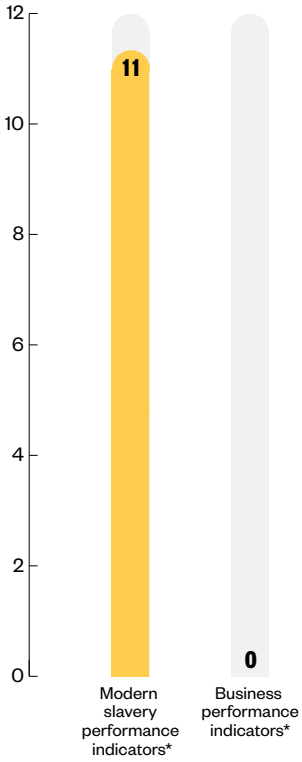
EFFECTIVENESS OF THE MODERN SLAVERY RESPONSE

Two types of key performance indicators (KPIs) are recommended by the UK Home Office guidance. First, business performance indicators, which are important in driving business and shaping the way it operates. These indicators may influence and create a modern slavery risk if not managed carefully; for example, finding the lowest price for agencies to clean rooms in a hotel might lead to exploitation of housekeepers. Secondly, businesses should also establish their own indicators to track progress of their modern slavery response,[50] referred to below as "modern slavery performance indicators."

Reporting on business KPIs which may increase the risk of modern slavery is non-existent. No company described how their business KPIs might increase risk of modern slavery, however Shiva Hotels did recognise that overtime and underpayment can occur if "productivity rates for housekeeping contracts are ill-advised." To combat this, the hotel is trialling a "time-in-motion" approach that allows for a reasonable time for housekeeping staff to clean a room, which in turn allows for a "high quality service."

Across most assessments of statements produced under the Act, effectiveness is the worst performing reporting area. The Resource Centre's analysis of reporting by the FTSE 100 companies found this to be the case three years in a row. In the 2018 analysis, an increased number of companies reported having modern slavery performance indicators, but these tended to be very similar, such as the number of employees trained on modern slavery or the number of suppliers audited. The same is true of the statements produced by the hotels sector. For example, Hand Picked Hotels Limited, Bannatyne Group Plc, Grosvenor Group, InterContinental, Macdonald Hotels Limited, Mitchells and Butlers, Shiva Hotels, and Soho House & Co all described similar KPIs to track the effectiveness of their anti-slavery response.

Figure 14: Number of statements describing modern slavery and business performance indicators



*Not mutually exclusive – statements could identify both types of KPIs

Few hotels, such as Hilton and TUI, reported on their progress against these KPIs. Hilton, for example, has the KPI: "100% operating hotels and pipeline countries mapped against human rights risks and information embedded in operations and development processes" and disclosed it has: "Mapped 100% operating hotels and pipeline countries against 11 human rights risk indices; Integrated Human Rights criteria in our annual internal Global Enterprise Risk Survey; Embedded human rights in the new country development due diligence process."

D and D London tracks the number of modern slavery incidents reported as a KPI. The company stated that they will know that the steps they are taking are effective if no incidents of modern slavery are reported. This is not accurate, however, as it only reveals that no incidents have been reported, not that they do not exist. The failure of a company to receive any incidents or complaints related to modern slavery simply suggests they must continue to review and revise their processes so that they better identify instances of modern slavery.

RECOMMENDATIONS

To measure effectiveness and that business practices do not increase risk of exploitation, hotels should:

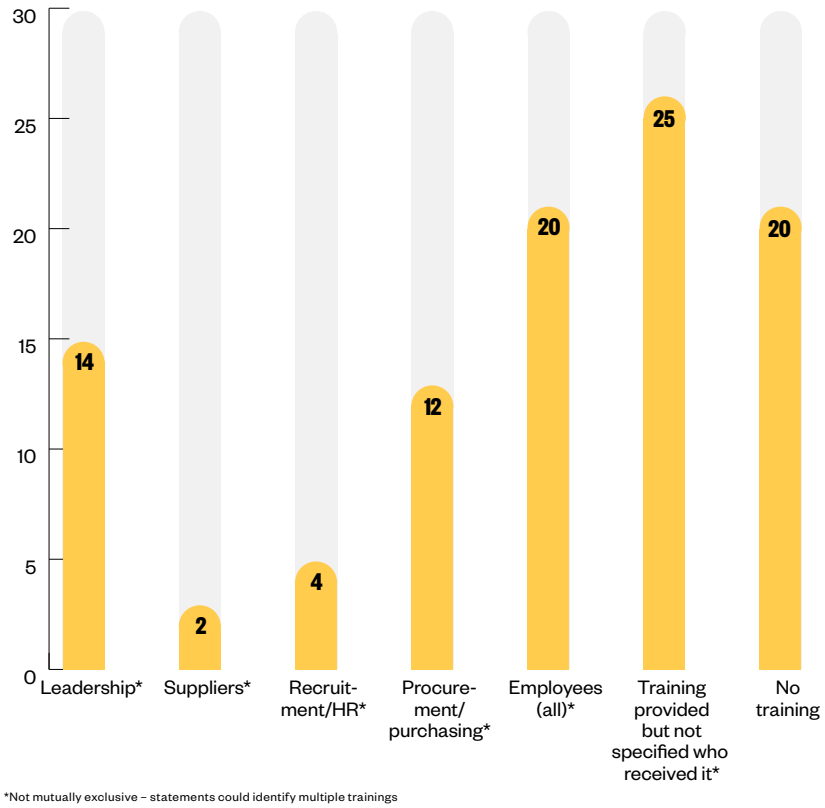
- Review current business KPIs (for example downward pressure on cost-price or entering new markets and production countries) to see if they increase or decrease the risk of modern slavery occurring in their operations and supply chains. These KPIs should be amended if they are found to increase risk,
- Establish specific KPIs related to their modern slavery policies and due diligence, and
- Report on their progress towards KPIs that track the progress of their modern slavery efforts in their UK Modern Slavery Act statement.

TRAINING

Training allows relevant staff within companies and business partners to understand, firstly, the importance and relevance of modern slavery in its operations and supply chains, and secondly, what they need to do to identify and prevent risks, and how to work together if they encounter incidents. The UK Home Office guidance states that training can be targeted to different groups either inside or outside the core business and may take many forms ranging from raising awareness to detailed training programs.[51]

For the hotel sector, training is critical for many different groups, including management level, Human Resources and recruitment teams, suppliers, and procurement specialists. These groups should be trained on the risks related to the various industries from which goods and services are sourced including agriculture, garment, cleaning, construction and many others. Some hotels also provide training to frontline staff to identify instances of modern slavery at operational level; general managers, for example, are particularly well-placed to coordinate training for all staff who work regularly within the hotel, such as those on reception.

Figure 15: Number of statements disclosing training and recipient of the training



*Not mutually exclusive – statements could identify multiple trainings

This training may cover how to spot the use of hotels as a venue for sexual exploitation or transit location for trafficking, or how to identify when outsourced staff recruited by a labour provider may be exploited.[52]

Over 28 percent (n=20) of statements did not describe any current training programmes. Club La Costa's statement, for example, demonstrated a lack of awareness on risks inherent in the sector, "[G]iven the wide ranging nature of our training programmes and our low risk activities we do not feel we have to have a specific module dedicated to anti-slavery and human trafficking."

Some statements described providing training to all staff, including those in owned, managed, and franchised hotels. For example, Wyndham Worldwide provided training or education materials on child labour and human trafficking to all managed and owned hotels in the US, managed hotel properties in Asia Pacific, Europe, Middle East, Africa and Latin America, their franchised operations, and suppliers. Marriott provided training in 17 languages and required all on-property associates in managed and franchised properties to complete the training.

While it is encouraging to see companies providing training to all staff, the content of the training was either not described, or was quite broad and referred to as "raising awareness" of modern slavery. Hotels must also provide bespoke training to educate relevant staff members on specific risks regarding the employment of migrant workers, use of agency labour, and supply chain risks. There were some good practice examples; Meininger reports its training will cover "purchasing practices, which influence supply chain conditions and which should therefore be designed to prevent purchases at unrealistically low prices, the use of labour engaged on unrealistically low wages or wages below a country's national minimum wage, or the provision of products by an unrealistic deadline". However, we would expect the level of training provided to HR/ recruitment and procurement specialists to be much higher than the six percent (n=4) and 17 percent (n=12) of statements respectively.

While it is encouraging to see companies providing training to all staff, the content of the training was either not described, or was quite broad and referred to as "raising awareness" of modern slavery

Although the potential for hotels to be used as a venue or transit point for forced sexual exploitation has long been recognised, companies are still failing to provide relevant training for their frontline staff — those most likely to identify incidents. Just 10 percent of statements (n=7) provided such details; Travelodge, for example, conducted training on preventing child sexual exploitation for all hotel employees.

RECOMMENDATIONS

To be able to better understand and respond to modern slavery, hotels should:

- Develop specific training programs targeted to different direct employees and suppliers, including on the risks associated with migrant workers and hotels as a venue for forced sexual exploitation,
- Measure the effectiveness of these training programs by reviewing employee knowledge and action after receiving the training,

And disclose this training in their modern slavery statements.

CONCLUSION

Across many sectors, statements produced under the UK Modern Slavery Act are failing to meet the requirements of the Act and the accompanying UK Home Office guidance. The hotel sector is no exception. The 71 statements we assessed consistently failed to address sector-specific risks: complex supply chains, the fragmented nature of franchising, the use of localised and informal purchasing agreements, seasonal and temporary working arrangements, and limited brand oversight.

Now, four years on from the passage of the Act, we would expect to see statements that not only demonstrate business' awareness of modern slavery but disclose the company's responses to these risks as they pertain specifically to their industry. Yet, significant gaps remain.

The running of just one hotel depends upon a collection of disparate companies — owners, management companies, brands and labour providers — that all have different roles and provide different services. The fragmented nature of the sector makes it difficult to have visibility into supply chains and it will always be challenging to allocate responsibility for workers' welfare and mitigating modern slavery risk among the complex network of business partners.

This does not offer a loophole for non-compliance, rather, it potentially increases the risk of modern slavery and its impact on business operations and brand name, as each company relies on the others to "take the fall" if cases of modern slavery are found. Regardless of legal liability, hotel companies themselves ultimately have a moral responsibility to protect workers at risk of exploitation in their direct operations and supply chains.

On reporting, hotels are falling at the first hurdle, failing to meet even the basic steps of the Act and to provide sufficient disclosure on their operations and supply chains. Alarmingly, some hotels are still not reporting at all and those that do have made it difficult to assess change over time. Only a few have implemented measures known to help prevent exploitation, such as the "employer pays" principle, into their operations. Concerningly, over a third of statements (35 percent or n=25) did not disclose due diligence processes and those that did defined this narrowly as audits and compliance-driven approaches. These are unlikely to identify instances of forced labour by themselves.

On reporting, hotels are falling at the first hurdle, failing to meet even the basic steps of the Act and to provide sufficient disclosure on their operations and supply chains

Use of risk assessments are limited and identification of risks are very broad as to become almost meaningless. It is clear that statements merely disclose risks associated with other sectors and are not the result of an assessment developed with hotel operations and supply chains in mind. Statements describing methods to measure effectiveness are few and far between, while training does not target those who would benefit most from receiving it.

Despite companies' failure to demonstrate meaningful efforts to tackle the risks endemic in this sector, a strong case remains for action against modern slavery by the hotel sector, an approach that can only benefit from collective action between owners, management companies, brands and labour providers. Sector-specific initiatives facilitate engagement between peers, capitalise on business partnerships to share good practice or streamline protective measures against modern slavery.

Beyond collaborative action, hotels must commit to review their due diligence processes and disclose any incidents of modern slavery and the steps taken to remedy these. To encourage a move beyond compliance, the UK Government should release a list of those who are required to report to facilitate analysis and enforce the Act against non-compliant companies.

As mandatory reporting requirements and mandatory human rights due diligence are established in other countries it is important that any business and human rights legislation is strengthened and enforced. Without effective implementation by governments and a renewed commitment by business to combat exploitation, vulnerable individuals in hotel operations and supply chains remain at risk of modern slavery.

Getsemani, Colombia. Bilingual sign prohibiting sex tourism at the hotel. Hotels can be used as a venue for forced sexual exploitation or as a transit point for those forced into the sex industry. Photo credit: Jeffrey Greenbery/ Universal Images Group via Getty Images.

APPENDIX 1: LIST OF METRICS

- **Modern Slavery Act (MSA) statement:** Did the company produce a statement in relation to the UK's Modern Slavery Act?
- **MSA statement homepage link:** Does the company's homepage link to their Modern Slavery Act statement?
- **MSA historic record:** Does the company provide links to their modern slavery statements from previous years?
- **MSA statement signed:** Was the company's Modern Slavery Act statement signed by an appropriate person?
- **MSA statement approval:** Was the company's Modern Slavery Act statement explicitly approved by the board of directors (or equivalent management body)?
- **MSA ownership disclosure:** Does the company disclose the ownership structure(s) and/or business model(s) of each of its brands, subsidiaries, and other businesses?
- **MSA supply chain disclosure:** Does the company's statement identify the suppliers in their supply chain and/or the geographic regions where their supply chain operates?
- **MSA policy:** Does the company's statement detail specific, organisational policies or actions to combat slavery in their supply chain?
- **MSA risk assessment:** How does the company assess the risks of modern slavery and trafficking in their supply chain?
- **MSA identification of risks:** Does the company's statement identify specific countries, regions or industries where the risk of modern slavery is the greatest?
- **MSA risk management:** Does the company continuously monitor suppliers to ensure that they comply with the company's policies and local laws?
- **MSA incidents identified:** Did the company identify any specific incidents related to modern slavery that require(d) remediation?
- **MSA incidents remediation:** Did the company explain the corrective steps it has taken (or would take) in response to modern slavery incidents with suppliers?
- **MSA whistleblowing mechanism:** Does the company have a grievance mechanism in place to facilitate whistleblowing or the reporting of suspected incidents of slavery or trafficking?
- **MSA training:** Does the statement describe training for staff that is specifically geared towards detecting signs of slavery or trafficking?
- **MSA performance indicators:** Does the company define performance indicators for assessing the effectiveness of their efforts to combat slavery and trafficking?
- **MSA business performance indicators:** Has the company reviewed business KPIs to ensure they are not increasing risk of modern slavery?
- **MSA impact on company behaviour:** Does the company's statement describe a change in their policy that occurred as a direct result of the UK Modern Slavery Act 2015?

APPENDIX 2: HOTELS AND STATEMENTS INCLUDED IN THIS ANALYSIS

Company	Year of statement being assessed	Do they have a UK Modern Slavery Act statement?	URL on WikiRate platform
Accor UK Business Leisure Hotels Limited	2018	No	
Accor UK Ltd	2018	Yes	https://wikirate.s3.amazonaws.com/files/5406024/20707281.pdf
Alfa Leisureplex Group	2018	Yes	https://wikirate.s3.amazonaws.com/files/5398629/20687858.pdf
Apex Hotels	2019	Yes	https://wikirate.s3.amazonaws.com/files/5406050/20707321.pdf
Aprirose Limited	2018	Yes	https://wikirate.s3.amazonaws.com/files/5306674/20475677.pdf
Arora Hotels	2019	Yes	https://wikirate.s3.amazonaws.com/files/5406063/20707359.pdf
Awaze	2019	Yes	https://wikirate.s3.amazonaws.com/files/5403931/20700898.pdf
Bannatyne Group Plc	2018	Yes	https://wikirate.s3.amazonaws.com/files/5398645/20687917.pdf
Beds and Bars Group Ltd	2019	Yes	https://wikirate.s3.amazonaws.com/files/5342154/20556408.pdf
Belmond Ltd	2017	Yes	https://wikirate.s3.amazonaws.com/files/5291940/20435700.pdf
Capital Hill Hotels Limited	2018	No	
Center Parcs Limited	2018	Yes	https://wikirate.s3.amazonaws.com/files/5291949/20435709.pdf
Club La Costa Plc	2016	Yes	https://wikirate.s3.amazonaws.com/files/5291958/20435718.pdf
D&D London Ltd	2018	Yes	https://wikirate.s3.amazonaws.com/files/5291976/20435736.pdf
Daniel Thwaites plc	2018	Yes	https://wikirate.s3.amazonaws.com/files/5291967/20435727.pdf
Dorchester Hotel Limited	2018	Yes	https://wikirate.s3.amazonaws.com/files/5397248/20684551.pdf
English Lakes Hotels Limited	2018	Yes	https://wikirate.s3.amazonaws.com/files/5291994/20435754.pdf
Exclusive Hotels and Venues	2018	Yes	https://wikirate.s3.amazonaws.com/files/5406090/20707415.pdf
Firmdale Hotels	2017	Yes	https://wikirate.s3.amazonaws.com/files/5306691/20475742.pdf
Four Seasons	2019	No	
Fuller Smith and Turner plc	2019	Yes	https://wikirate.s3.amazonaws.com/files/5406104/20707431.pdf
Geronimo Inns Limited	2019	Yes	https://wikirate.s3.amazonaws.com/files/5398896/20688743.pdf
Gleneagles Hotels	2018	Yes	https://wikirate.s3.amazonaws.com/files/5406117/20707446.pdf
GLH Hotels Ltd	2018	Yes	https://wikirate.s3.amazonaws.com/files/5397117/20684256.pdf

Company	Year of statement being assessed	Do they have a UK Modern Slavery Act statement?	URL on WikiRate platform
Grange Hotels	2018	Yes	https://wikirate.s3.amazonaws.com/files/5293839/20440102.pdf
Great Eagle Hotels UK Ltd	2018	Yes	https://wikirate.s3.amazonaws.com/files/5406179/20707524.pdf
Greene King	2018	Yes	https://wikirate.s3.amazonaws.com/files/5292030/20435790.pdf
Hallmark Hotels Limited	2018	Yes	https://wikirate.s3.amazonaws.com/files/5296508/20446938.pdf
Hand Picked Hotels Limited	2018	Yes	https://wikirate.s3.amazonaws.com/files/5398914/20688823.pdf
Hapimag AG	2018	Yes	https://wikirate.s3.amazonaws.com/files/5292038/20440179.pdf
Harbour Hotels	2019	Yes	https://wikirate.s3.amazonaws.com/files/5406130/20707462.pdf
Hastings Hotels	2018	Yes	https://wikirate.s3.amazonaws.com/files/5406152/20707488.pdf
Hilton Worldwide Holdings	2018	Yes	https://wikirate.s3.amazonaws.com/files/5323468/20504757.pdf
Hoburne Limited	2018	Yes	https://wikirate.s3.amazonaws.com/files/5440251/20770990.pdf
HPI UK Holding Ltd	2018	Yes	https://wikirate.s3.amazonaws.com/files/5292073/20435833.pdf
Hyatt Hotels Corporation	2016	Yes	https://wikirate.s3.amazonaws.com/files/5449056/20838074.pdf
Imperial London Hotels Group Ltd	2018	Yes	https://wikirate.s3.amazonaws.com/files/5292082/20435842.pdf
Indian Hotel Company	2018	No	
InterContinental Hotels Group	2018	Yes	https://wikirate.s3.amazonaws.com/files/5430462/20747736.pdf
J D Wetherspoon	2018	Yes	https://wikirate.s3.amazonaws.com/files/5398930/20688963.pdf
Jumeirah Group	2019	No	
Jupiter Hotels Limited	2018	Yes	https://wikirate.s3.amazonaws.com/files/5398937/20688971.pdf
Jurys Inns Ltd	2018	Yes	https://wikirate.s3.amazonaws.com/files/5406165/20707503.pdf
Landmark Hotel London Limited	2018	Yes	https://wikirate.s3.amazonaws.com/files/5292117/20435877.pdf
MacDonald Hotels Limited	2018	Yes	https://wikirate.s3.amazonaws.com/files/5398727/20688206.pdf
Mandarin Oriental Hyde Park Ltd	2018	No	
Marriott International	2018	Yes	https://wikirate.s3.amazonaws.com/files/5430669/20748089.pdf
Marston's	2018	Yes	https://wikirate.s3.amazonaws.com/files/5406193/20707540.pdf

Company	Year of statement being assessed	Do they have a UK Modern Slavery Act statement?	URL on WikiRate platform
Maybourne Hotels Limited	2018	Yes	https://wikirate.s3.amazonaws.com/files/5410869/20713993.pdf
Meininger Holding GmbH	2018	Yes	https://wikirate.s3.amazonaws.com/files/5294248/20441502.pdf
Merlin Entertainments PLC	2018	Yes	https://wikirate.s3.amazonaws.com/files/5410882/20714014.pdf
Millennium Copthorne Hotels	2018	Yes	https://wikirate.s3.amazonaws.com/files/5410955/20714411.pdf
Mitchells & Butlers plc	2018	Yes	https://wikirate.s3.amazonaws.com/files/5292162/20435922.pdf
Morris Leisure Limited	2018	Yes	https://wikirate.s3.amazonaws.com/files/5292170/20435930.pdf
Parkdean Resorts Limited	2018	Yes	https://wikirate.s3.amazonaws.com/files/5400959/20693363.pdf
Percy R Brend Sons Hoteliers Limited	2019	Yes	https://wikirate.s3.amazonaws.com/files/5406228/20707600.pdf
PGL	2018	Yes	https://wikirate.s3.amazonaws.com/files/5294840/20442728.pdf
RBH Hotel Management Limited	2018	Yes	https://wikirate.s3.amazonaws.com/files/5304446/20469902.pdf
RBH Hotels UK Ltd	2018	Yes	https://wikirate.s3.amazonaws.com/files/5294937/20442975.pdf
Rocco Forte Hotels Limited	2019	Yes	https://wikirate.s3.amazonaws.com/files/5444109/20775024.pdf
SACO The Serviced Apartment Company Limited	2019	Yes	https://wikirate.s3.amazonaws.com/files/5398997/20689040.pdf
Shearings Leisure Group Limited	2018	Yes	https://wikirate.s3.amazonaws.com/files/5410917/20714080.pdf
Shiva Hotels Group LLP	2019	Yes	https://wikirate.s3.amazonaws.com/files/5320529/20497730.pdf
Sir Richard Sutton Limited	2018	No	
Soho House Holdings Limited	2018	Yes	https://wikirate.s3.amazonaws.com/files/5292214/20435974.pdf
Splendid Hospitality	2019	Yes	https://wikirate.s3.amazonaws.com/files/5406241/20707613.pdf
Strand Palace Hotel & Restaurants Ltd	2019	Yes	https://wikirate.s3.amazonaws.com/files/5292223/20435983.pdf
Taj International Hotels Limited	2016	Yes	https://wikirate.s3.amazonaws.com/files/5291922/20435682.pdf
The Celtic Manor Resort	2018	Yes	https://wikirate.s3.amazonaws.com/files/5406077/20707400.pdf
The Goodwood Estate Company Limited	2018	Yes	https://wikirate.s3.amazonaws.com/files/5292196/20442012.pdf
The Rezidor Hotel Group	2017	Yes	https://wikirate.s3.amazonaws.com/files/5324807/20507684.pdf
The Savoy Hotel Ltd	2018	Yes	https://wikirate.s3.amazonaws.com/files/5406033/20707298.pdf

Company	Year of statement being assessed	Do they have a UK Modern Slavery Act statement?	URL on WikiRate platform
Travelodge Hotels	2018	Yes	https://wikirate.s3.amazonaws.com/files/5406255/20707629.pdf
Trust Inns	2018	Yes	https://wikirate.s3.amazonaws.com/files/5403925/20700889.pdf
TUI Group	2018	Yes	https://wikirate.s3.amazonaws.com/files/5398580/20687736.pdf
VUR Village Trading No 1 Limited	2018	Yes	https://wikirate.s3.amazonaws.com/files/5410926/20714092.pdf
Whitbread	2019	Yes	https://wikirate.s3.amazonaws.com/files/5399032/20689125.pdf
Wyndham Worldwide	2018	Yes	https://wikirate.s3.amazonaws.com/files/5292258/20436018.pdf

ENDNOTES

[1] International Labour Office 2015, "Sectoral Studies on Decent Work in Global Supply Chains Comparative Analysis of Good Practices by Multinational Enterprises in Promoting Decent Work in Global Supply Chains".

[2] As above.

[3] Shiva Foundation 2018, Stop Slavery Blueprint. Available from: http://www.shivafoundation.org.uk/Blueprint/#1534166149795-46b5e29a-c1e9. [23 August 2019].

[4] International Labour Office and the Walk Free Foundation 2017, "Global Estimates of Modern Slavery". Available from: https://www.ilo.org/wcmsp5/groups/public/---dgreports/---dcomm/documents/publication/wcms_575479.pdf. [23 August 2019].

[5] See: Tuppen, H. 2013, "Addressing Human Trafficking in the Hospitality Industry". Available from: http://www.greenhotelier.org/know-how-guides/addressing-human-trafficking-in-the-hospitality-industry/. [23 August 2019].; Stop Slavery Hotel Industry Network 2017, "Framework for working with suppliers: mitigating risk of modern slavery". Available from: https://www.stopslaverynetwork.org/wp-content/uploads/2018/03/SF17_SHIN_framework_dec17-11-links-RGB-min-1.pdf. [23 August 2019].; Kotecha, A., Hargrove, J. n.d., "Modern Slavery & the Hotel Industry: Best Practice Guidance for Franchising". Available from: https://s3.ap-southeast-1.amazonaws.com/freedom.collaborative.prod/uploads/SN10265%20Hotel%20Franchisors%20and%20Modern%20Slavery%20Brochure%20v5.pdf [23 August 2019].; Shiva Foundation 2018, "Stop Slavery Blueprint". Available from: http://www.shivafoundation.org.uk/Blueprint/#1534166149795-46b5e29a-c1e9. [23 August 2019].

[6] Baum, T. 2012, "Migrant workers in the international hotel industry", International Labour Office. Available from: https://www.ilo.org/wcmsp5/groups/public/---ed_dialogue/---sector/documents/publication/wcms_180596.pdf. [23 August 2019].

[7] Stop Slavery Hotel Industry Network 2017, "Framework for working with suppliers: mitigating risk of modern slavery". Available from: https://www.stopslaverynetwork.org/wp-content/uploads/2018/03/SF17_SHIN_framework_dec17-11-links-RGB-min-1.pdf. [23 August 2019].;

[8] Patty A. 2019, "Staff at luxury hotel group threatened after speaking out about exploitation", The Sydney Morning Herald. Available from: https://www.smh.com.au/business/workplace/staff-at-luxury-hotel-group-threatened-after-speaking-out-about-exploitation-20190708-p5258b.html. [17 September 2019].

[9] Kelly, A. McNamara, M-L., 2017, "A slave in Scotland: 'I fell into a trap – and I couldn't get out'", The Guardian. Available from: https://www.theguardian.com/global-development/2016/may/28/slavery-human-trafficking-hotel-workers-bangladesh-scotland. [17 September 2019].

[10] Polaris 2015, "Human Trafficking the Hotel Industry". Available from: https://polarisproject.org/sites/default/files/human-trafficking-hotel-industry-recommendations.pdf. [23 August 2019].

[11] International Labour Office 2015, "Sectoral Studies on Decent Work in Global Supply Chains Comparative Analysis of Good Practices by Multinational Enterprises in Promoting Decent Work in Global Supply Chains".

[12] Roberts, Y 2015, "Britain's hotel workers – bullied, underpaid and with few rights", The Guardian. Available from: https://www.theguardian.com/business/2015/may/30/hotel-workers-bullied-underpaid-few-rights-uk. [16 October 2019].

[13] ECPAT USA 2017. "No Vacancy for Child Sex Traffickers Impact Report." Available from: https://static1.squarespace.com/static/594970e91b631b3571be12e2/t/59c9b6bfb07869cc5d792b8c/1506391761747/NoVacany_Report.pdf. [23 August 2019].

[14] Polaris 2015, "Human Trafficking the Hotel Industry". Available from: https://polarisproject.org/sites/default/files/human-trafficking-hotel-industry-recommendations.pdf. [23 August 2019].

[15] International Labour Office 2015, "Sectoral Studies on Decent Work in Global Supply Chains Comparative Analysis of Good Practices by Multinational Enterprises in Promoting Decent Work in Global Supply Chains".

[16] As above.

[17] Business and Human Rights Resource Centre n.d., "Inhospitable: How hotels in Qatar & the UAE are failing migrant workers". Available from: https://www.business-humanrights.org/sites/default/files/Gulf-Hotels-Briefing.pdf. [23 August 2019].

[18] As above.

[19] Adapted from: International Labour Office 2015, "Sectoral Studies on Decent Work in Global Supply Chains Comparative Analysis of Good Practices by Multinational Enterprises in Promoting Decent Work in Global Supply Chains".

[20] Kotecha, A., Hargrove, J. n.d., "Modern Slavery & the Hotel Industry: Best Practice Guidance for Franchising". Available from: https://s3.ap-southeast-1.amazonaws.com/freedom.collaborative.prod/uploads/SN10265%20Hotel%20Franchisors%20and%20Modern%20Slavery%20Brochure%20v5.pdf. [23 August 2019].

[21] As above.

[22] Kafala is a sponsorship system where workers' visas are directly sponsored by employers, which makes the ability to complain or leave difficult or impossible.

[23] Business and Human Rights Resource Centre n.d., "Inhospitable: How hotels in Qatar & the UAE are failing migrant workers". Available from: https://www.business-humanrights.org/sites/default/files/Gulf-Hotels-Briefing.pdf. [23 August 2019].

[24] Ghani F. 2019, "Qatar moves to announce abolishment of kafala system", Al Jazeera. Available from: https://www.aljazeera.com/news/2019/10/qatar-moves-announce-abolishment-kafala-system-191017070750729.html. [28 October 2019].

[25] Pattisson, P. 2018, "Migrants claim recruiters lured them into forced labour at a top Qatar hotel", The Guardian. Available from: https://www.theguardian.com/global-development/2018/oct/29/agents-duped-us-into-forced-labour-at-top-qatar-hotel-say-migrant-workers-marsa-malaz-kempinski. [23 August 2019].

[26] Tuppen, H. 2013, "Addressing Human Trafficking in the Hospitality Industry". Available from: http://www.greenhotelier.org/know-how-guides/addressing-human-trafficking-in-the-hospitality-industry/. [23 August 2019].

[27] UK Government 2015, "Modern Slavery Act". Available from: http://www.legislation.gov.uk/ukpga/2015/30/section/54/enacted. [23 August 2019].

[28] Australian Government 2018, "Modern Slavery Act No 153, 2018". Available from: https://www.legislation.gov.au/Details/C2018A00153. [23 August 2019].

[29] Due to the complexity of the statements' contents and the occasional need for subjective interpretation there may be discrepancies between the data and cited sources. Upon review of the data and finding such discrepancies, we invite you to make corrections directly on the WikiRate platform. In case of any questions or difficulties please reach out to the WikiRate team.

[30] UK Government 2015, "Modern Slavery Act". Available from: http://www.legislation.gov.uk/ukpga/2015/30/section/54/enacted. [23 August 2019].

[31] "Independent Review of the Modern Slavery Act 2015: Final Report". May 2019. Available from: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/815410/Government_Response_to_Independent_Review_of_MS_Act.pdf?_ga=2.113206284.924453583.1566910438-1687666633.1527168977. [24 August 2019].

[32] Accor (U.K.) Limited has published a statement, which details the steps taken by corporate group Accor S.A. and its worldwide subsidiary undertakings. Accor UK Business Leisure Hotels Limited is listed on OpenCorporates as a subsidiary of Accor S.A, however it is not explicitly listed as an entity in the Accor (U.K.) Limited statement. See Accor (U.K.) Limited statement: https://wikirate.s3.amazonaws.com/files/5406024/20707281.pdf. A search of the website on 15th November did not reveal a statement.

[33] Capital Hill Hotels Group London Limited had a turnover of over £40million in 2018 and in 2017. See https://beta.companieshouse.gov.uk/company/03462675/filing-history. It does not have a website, and the two hotels described in the company information on Companies House are St Martins Lane and Sanderson. These appear to be associated with Morgans Hotel Group, which is part of sbe. Accor has just acquired 50 percent stake in sbe. https://www.sbe.com/aboutsbe/. A search of the website on 15th November did not reveal a statement.

[34] Four Seasons Hotels and Resorts has an estimated annual turnover of US$12 billion and operates hotels in the UK, including Four Seasons Hotel London at Park Lane, at Ten Trinity Square, and in Hampshire. It is controlled by Whitbread, however, it is not listed as a brand or subsidiary in the Whitbread statement. A search of the website on 15th November did not reveal a statement.

[35] Taj hotels has a statement and is a brand of Indian Hotel Company Limited. Indian Hotel Company Limited does not have a statement. A search of the website on 15th November did not reveal a statement.

[36] Dubai Holdings, of which Jumeirah Group is a part, had an estimated revenue of £3.7billion in 2016. https://www.thenational.ae/business/travel-and-tourism/jumeirah-group-ceo-steps-down-for-personal-reasons-1.91376. Jumeirah operates hotels in the UK, including Grosvenor House Suites, Jumeirah Carlton Tower, and Jumeirah Lowndes Hotel. Neither Jumeirah Group nor Dubai Holdings have released a statement. A search of the website on 15th November did not reveal a statement.

[37] Mandarin Oriental Hyde Park Ltd had a turnover of £37 million in 2018. A search of the website for Mandarin Oriental The Hotel Group also did not reveal a statement. See https://beta.companieshouse.gov.uk/company/06192910/filing-history. A search of the website on 15th November did not reveal a statement.

[38] Sir Richard Sutton Limited had a revenue of over £74 million in 2018 and over £52 million in 2017. See: https://beta.companieshouse.gov.uk/company/00346359/filing-history. No statement could be found on the website. A search of the website on 15th November did not reveal a statement.

[39] Home Office 2018, "Transparency in Supply Chains etc. A practical guide." Available from: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/649906/Transparency_in_Supply_Chains_A_Practical_Guide_2017.pdf. [23 August 2019].

[40] UK Government 2015, "Modern Slavery Act". Available from: http://www.legislation.gov.uk/ukpga/2015/30/section/54/enacted. [23 August 2019].

[41] WikiRate and the Walk Free Foundation 2018, "Beyond Compliance: The Modern Slavery Act Research Project". Available from: https://cdn.minderoo.com.au/content/uploads/2019/05/27154005/Wikirates_WFF_MSA-Analysis_180917_Digital.pdf. [23 Augus 2019]. Business & Human Rights Resource Centre n.d., "FTSE 100 & the UK Modern Slavery Act: From Disclosure to Action". Available from: https://www.business-humanrights.org/sites/default/files/FTSE%20100%20Briefing%202018.pdf. [25 August 2019]. See also Carrier, P. 2019, "The Modern Slavery Act turns four today. Is it working? And how can it be improved?" Business & Human Rights Resource Centre. Available from: https://www.business-humanrights.org/en/the-modern-slavery-act-turns-four-today-is-it-working-and-how-can-it-be-improved. [9 September 2019].

[42] "Modern Slavery Registry". Available from: https://www.modernslaveryregistry.org/. [9 September 2019].

[43] UK Government 2015, "Modern Slavery Act". Available from: http://www.legislation.gov.uk/ukpga/2015/30/section/54/enacted. [23 August 2019].

[44] Home Office 2018, "Transparency in Supply Chains etc. A practical guide." Available from: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/649906/Transparency_in_Supply_Chains_A_Practical_Guide_2017.pdf. [23 August 2019].

[45] As above. See also United Nations Human Rights Office of the High Commissioner 2011, "Guiding Principles on Business and Human Rights: Implementing the United Nations "Protect, Respect and Remedy" Framework". Available from: https://www.ohchr.org/documents/publications/GuidingprinciplesBusinesshr_eN.pdf. [17 September 2019].

[46] Home Office 2018, "Transparency in Supply Chains etc. A practical guide." Available from: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/649906/Transparency_in_Supply_Chains_A_Practical_Guide_2017.pdf. [23 August 2019].

[47] International Tourism Partnership 2019, "Human Rights". Available from: https://www.tourismpartnership.org/human-rights//. [16 September 2019].

[48] International Tourism Partnership 2019, "News". Available from: https://www.tourismpartnership.org/blog/itp-launches-principles-on-forced-labour/. [16 September 2019].

[49] Home Office 2018, "Transparency in Supply Chains etc. A practical guide." Available from: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/649906/Transparency_in_Supply_Chains_A_Practical_Guide_2017.pdf. [23 August 2019].

[50] As above.

[51] As above.

[52] ECPAT USA 2017. "No Vacancy for Child Sex Traffickers Impact Report." Available from: https://static1.squarespace.com/static/594970e91b631b3571be12e2/t/59c9b6bfb07869cc5d792b8c/1506391761747/NoVacany_Report.pdf. [23 August 2019].

ABOUT THE AUTHORS

Minderoo Foundation's Walk Free Initiative recognises that tackling one of the world's largest and most complex human rights issues requires serious strategic thinking. We approach this challenge by integrating world class research with direct engagement with some of the world's most influential government, business and religious leaders. We invest our time and resources in a collaborative manner to drive behaviour and legislative change to impact the lives of the estimated 40 million people living in modern slavery today.

WikiRate has developed an open access research platform that allows anyone to systematically gather and report publicly available information on corporate Environmental, Social and Governance (ESG) practices. By making corporate responsibility data accessible, comparable and free for all, the organisation aims to provide society with the tools it needs to encourage companies to respond to social and environmental challenges.

Business & Human Rights Resource Centre is a high-impact, global organisation that works to advance respect for human rights in business and hold companies accountable for abuse. The Resource Centre operates the Modern Slavery Registry, a free and independent resource that holds over 10,000 company statements published pursuant to the UK Modern Slavery Act 2015. The Registry is a resource that tracks compliance with the legislation, increases transparency and helps hold companies accountable for their efforts to combat modern slavery.

Australian National University (ANU) College of Law is one of the world's top 15 law schools. As Australia's national law school, we address the major legal, social and political challenges of the 21st century by shaping and influencing public policy. The College makes a significant contribution to the University's five-star rating in Excellence in Research Australia.

MINDEROO.COM.AU
/WALK-FREE