

Incident Reporting Protocols

To incorporate into HR and Manager Manuals.

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

Reporting Protocols

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

If a hotel employee witnesses an indicator leading them to suspect human trafficking or other types of modern slavery, they must inform the Anti-Slavery Champion or duty manager immediately, in order to submit an internal report. See [Indicator List](#).

The senior manager on duty will continue to observe the situation. When the indicators reach the pre-agreed level of severity, it is deemed an “incident.” Staff are not to try to investigate the situations themselves.

The senior manager on duty must, where possible, remain with the potential victim and not draw attention to the fact that the victim has sought assistance, for example, s/he must not keep the potential victim in view of those who may be controlling him/her or even those working alongside that person. See [Guidelines for Supporting at Risk Individuals](#). An incident form should also be completed as per company protocols. See [Incident Report](#).

- **The senior manager on duty** will move the victim to a safe space if possible (this can be a sister hotel with a pre-arranged relationship) and will record as much information as possible using notes, CCTV footage, staff testimony, etc.
- **On receiving a report of a potential incident of modern slavery within the UK**, the General Manager (or senior manager on duty in the General Manager’s absence) will contact the local victims services provider and/or local police and will then follow their advice. For calling the police, s/he will call 999 if the victim is still on the premises, otherwise s/he will call 101.
- **On receiving a report of a potential incident of modern slavery outside of the UK**, the General Manager (or senior manager on duty in the General Manager’s absence) and crisis team enact the incident management process considering elements like whether the person in question is in immediate risk or harm or whether s/he is still on the premises. The General Manager contacts the police and/or relevant victims services provider as appropriate and follows the process as part of the general management procedure.
- **In emergencies**, where there is immediate risk of harm, regardless of whether the victim is still on the premises, the General Manager must follow existing safety procedures and the local police must be contacted on 999 immediately.
- **Follow up with relevant staff** may be needed. It is important to reassure the person who made the report and ensure that they are supported.
- **The crisis team** will inform head office and other contacts identified in the crisis management procedure as soon as possible. Records should also be kept as well as the police case number in case there is any follow up.

- **On an ongoing basis**, the General Manager should assess management of the protocol by tracking incidents, soliciting feedback, improving the protocols, and monitoring compliance. At least once a year, the General Manager should feedback on this assessment to the Anti-Slavery Committee (made up of head office staff).

If a hotel does not have an existing relationship with the local police or a local victim support provider, the General Manager must build such a relationship.

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

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