Combat Trafficking in Human Beings

Reporting and Monitoring

September 2015

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An overview of an Anti-THB Auditing and Reporting system

Anti-THB monitoring involves the continuous evaluation of the effectiveness of the anti-trafficking policy through regular audits on the property's standard operational procedures and its supply chain and outsourcing agencies. Monitoring activities are part of the day-to-day anti-trafficking controls and need to be built in to 'business as usual'.

- Once trafficking risk has been assessed and 'barriers' and controls to mitigate it established, the company needs to monitor how effective the latter are. This is normally achieved with a suite of key performance indicators.

- The Internal Audit (or Compliance) team will develop compliance audit programmes based on established 'barriers' and controls in order to address the areas where the property faces elevated human trafficking risk and to test that these 'barriers' and controls in place are sufficiently capable to mitigate the risk.

- The THB Task Force (TTF) or the Risk Management team will develop interactive dashboards and performance-scoring models to identify high risk properties and heat maps that can flag up potential areas of vulnerability by region and by country.

- Periodic programme reviews and re-assessments of anti-THB policies and standards will be carried out by Risk Management and Internal Audit to ensure that the anti-trafficking programme is evolving with the business and reports to the TTF or the company's Audit committee will be submitted every 12 months.

- The company will have to establish formal internal reporting standards with regards to anti-THB monitoring to the Audit committee and the Board. The company may choose to do also external reporting, especially if it had issues in the past and try to establish greater transparency.

- At corporate level, the anti-THB reporting structure can be the same as with every risk with the General Counsel being responsible for reporting the results of monitoring and enforcement, both internally to the Audit committee and the Board and externally to investors, regulators and other interested stakeholders.

Indicative Key Performance Metrics for Combating THB in Hospitality Industry

Anti-THB Culture	• Quality and clarity of Anti-THB policy statement / best practice statements • Annual Budget allocated to Anti-THB policy implementation / best practice • Prominence of Anti-THB policy in corporate strategy and reporting / best practice • # of Anti-THB programmes/initiatives supported by the company • # of properties adopting Anti-THB policy / total # of properties in portfolio • # of Tier-1 suppliers complying with Anti-THB policy / total # of Tier-1 suppliers • # of expert contacts in external Anti-THB networks
Training	• # of (operational/management/corporate) staff undertaking Anti-THB training per year/ total # of staff at O/M/C level • Person-hours spent on Anti-THB training per year/ total # of staff • Hours of Anti-THB training at O/M/C level per year/ total hours of training at O/M/C level • Cost of Anti-THB training at O/M/C level per year / total cost of training at O/M/C level • # of updates of learning database per year
People	• # of certified Anti-THB staff / property • # of certified Anti- THB 'hubs' / total portfolio • # of staff certified to treat victims / total portfolio • Level of engagement (number of consultations, events) of individual properties with company's TTF / total # of properties in portfolio • Level of engagement (number of consultations, events) of individual properties with external expert advisors / total # of properties in portfolio
Process	• % of properties risk assessed for THB per year / total # of properties in portfolio • Anti-THB budget allocated per 'hot property' per year • % of SOPs reviewed in Rooms Division / F&B / Facilities Mgmt / Human Resources Management / Procurement based on

	Anti-THB policy
Communication	• Level of engagement (visits, hours spent, downloads) of individual properties with intranet pages on THB • Availability (% of time within a year) of internal organisation-wide THB communication platforms • Availability (% of time within a year) of third party THB communication platforms
Incidents	• # of suspected cases reported internally / # of cases reported to law enforcement • # of cases reported to law enforcement / # of cases prosecuted • # of cases reported through internal communication platforms / # of cases reported through third party platforms
Auditing	• Levels of THB awareness among staff (through Employee Opinion Survey) • Levels of awareness and of trust in available reporting structures on THB (through Employee Opinion Survey) • # of property audits performed on Anti-THB compliance / total # of properties • % of compliance to Anti-THB SOPs in Rooms Division / F&B / Facilities Mgmt / Human Resources Management / Procurement per audited property • # of Tier-1 suppliers audited for THB / total # of Tier-1 Suppliers • # of outsourcing agencies audited for THB / total # of outsourcing agencies employed