

Modern Slavery Act 2015

Diversity Travel

Annual Statement

13th June 2019

Introduction

This statement sets out our actions to understand all potential modern slavery risks related to our business. It will outline the steps we have in place that are aimed at ensuring that there is no slavery or human trafficking in our business or any supply chains. As part of our commitment to the travel sector, we recognise that we have a responsibility to take a robust approach to the prevention and identification of slavery and human trafficking.

We are absolutely committed to preventing slavery and human trafficking in our corporate activities, and to ensuring that our supply chains are free from slavery and human trafficking.

Organisational structure

We are a provider of travel management services to clients in the charity, academic and not-for-profit sector. We have 159 employees and operate from our offices in London, Manchester and Melbourne. We also have a number of home-workers.

Our Business

Our business is organised into various department and this statement runs through all departments:

- Operations Department; including our Reservations Teams, Rail & Ticketing Team, Groups & Conferences Team and Visa Services Team
- Sales and Account Management
- Finance Department
- Marketing and Communications
- IT
- Training
- Admin
- HR & Recruitment.

Our Supply Chains & Partnerships

Our supply chains & partnerships include:

- Airlines (worldwide)
- Hotel booking tools
- Rail (UK & International) booking tools
- GDS systems
- Stationary supplier.

Our Policies on Slavery and Human Trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains, or in any part of our business. We are committed to acting ethically and with integrity in all our business relationships. We will implement and enforce effective systems and controls to ensure that slavery and human trafficking are not taking place anywhere in our supply chains.

We operate the following policies that describe our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in our operations:

- **Whistleblowing Policy** – we encourage all our staff, customers and other business partners to report any concerns related to our direct activities, or supply chains. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Our whistleblowing procedure is designed to make it easy for all stakeholders to make disclosures, without fear of retaliation.
- **Employee Code of Conduct** – our code makes clear to employees the actions and behaviour expected of them when representing us. We strive to maintain the highest standards of employee conduct and ethical behaviour when operating and managing our staff and supply chain.
- **Supplier Code of Conduct** – we are committed to ensuring that our suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. We work with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions.
- **Recruitment/Agency Workers' Policy** - we use only specified, reputable employment agencies to source labour. We verify the practices of any new agency we are using before accepting workers from that agency.

Due diligence

We undertake due diligence when considering taking on new suppliers, and regularly review our existing suppliers. Our due diligence and reviews include:

- **evaluating** the modern slavery and human trafficking risks of each new supplier
- **reviewing** on a regular basis all aspects of the supply chain
- **informing** each new supplier of our expectations, and providing them with a copy of the UK *Modern Slavery Act (2015)*.

We have in place systems to:

- **identify** and assess potential risk areas in our supply chains
- **mitigate** the risk of slavery and human trafficking occurring in our supply chain
- **monitor** potential risk areas in our supply chain
- **communicate** any concerns to appropriate Line Manager within Diversity Travel ☐
communicate any concerns to appropriate external authorities ☐ **protect** whistle-blowers.

This occurs through a range of strategies, including:

- each new supplier we on-board completes a **self-assessment checklist**, which evaluates their compliance with our standards and expectations in a range of core areas, including Modern Slavery and Human Trafficking identification and prevention
- any concerns identified in these areas are scored and used by our suppliers to prioritise suppliers that require further investigation
- where deficiencies in standards pertaining to Modern Slavery criteria are discovered, our Supplier Relations Team work with the supplier to clarify the issues. This can lead to them investigating whether we can proceed with the partnership, and whether any authorities need to be informed of our concerns
- the supplier will be taken off sale until our concerns are alleviated and the investigation resolved. This includes blacklisting suppliers within our online booking tools which ensures they do not appear in search results.

We also act retrospectively on any reports from travellers or our suppliers regarding concerns they may have had regarding the activities of others. Although thankfully we have had no cause to do so over the past year.

Training

To ensure a high-level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to our staff.

Our modern slavery training covers:

- how to **assess** the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available
- how to **identify** the signs of slavery and human trafficking
- the initial steps that should be taken if slavery or human trafficking is **suspected**
- how to **escalate** potential slavery or human trafficking issues to the relevant parties within the organisation
- what steps we should take if suppliers or contractors do not implement anti-slavery policies in highrisk scenarios, including their **removal from our supply chains** and **reporting to any relevant authorities** as appropriate.

Our reservations staff recently alerted one of our major charity partners of concerns we had regarding a rugby tour being organised by one of their in-country partners. Our staff became suspicious regarding some of the names of children that were being put forward in respect of the tour. We alerted the UK charity and the airline who cancelled the ticket. The charity alerted the partner organisation and the authorities in the departure country and the matter was investigated.

This statement is made pursuant to **Section 54(1) of the Modern Slavery Act 2015** and constitutes our slavery and human trafficking statement for the financial year ending **31st March 2019**.

Please do not hesitate to contact Diversity Travel on 0161 235 5400 should you have any queries, or require any further information, regarding any of the points contained within this annual statement.

A handwritten signature in black ink, appearing to read 'Airey', with a large, sweeping loop at the end.

Christopher Airey

Managing Director