

MODERN SLAVERY AND HUMAN TRAFFICKING POLICY

Company Name: Sinha Security Services Limited

Effective Date: 1 September 2026

Review Date: 1 September 2027

1. Policy Statement

Sinha Security Services Limited is committed to eliminating modern slavery, human trafficking, and forced labour from our business and supply chains. We operate a zero-tolerance policy against any form of exploitation.

As a provider of professional security services, we recognize our responsibility to protect the welfare of our workforce. This includes both our permanently employed staff and any temporary, casual, or agency personnel deployed on behalf of our clients.

2. High-Risk Focus Areas: SIA Licensing & Temporary Staffing

The UK private security and temporary recruitment sectors face specific risks regarding labour exploitation, umbrella company fraud, and coercive control. To mitigate these risks, **Sinha Security Services Limited** enforces strict operational safeguards:

A. SIA Licensing & Right to Work

- **Direct Verification:** We verify all original Security Industry Authority (SIA) licences directly via the SIA Register of Licence Holders before deployment.
- **Identity and Right to Work:** We perform thorough, in-person or certified digital Right to Work checks on all operatives to ensure they are legally entitled to work in the UK.
- **Document Retention:** We strictly prohibit the retention of original passports, ID documents, or SIA badges. Operatives must maintain control of their own documentation at all times.

B. Temporary and Agency Staffing Controls

- **Approved Suppliers Only:** We only source temporary or supplementary labour from vetted recruitment agencies that operate transparently and comply fully with the UK Modern Slavery Act 2015 and the Conduct of Employment Agencies and Employment Businesses Regulations 2003.



SINHA
SECURITY SERVICES LIMITED

SINHA SECURITY SERVICES LIMITED

PHONE: +44 7759 826816

EMAIL: info@sinhasecurityservices.co.uk

- **No Work-Finding Fees:** We guarantee that no temporary worker deployed by or through our business has been forced to pay a fee to secure employment.
- **Direct Electronic Payment:** All temporary and agency staff must be paid directly into a verified personal bank account belonging to the worker. We do not pay wages into third-party accounts, which can be a primary indicator of financial exploitation.

3. Supply Chain Due Diligence

When partnering with labour providers or subcontracting SIA security personnel, we require our partners to demonstrate:

- Proof of robust worker vetting processes (aligned with BS 7858 or equivalent standards).
- Clear evidence that payroll processes comply with UK tax laws, preventing exploitative or non-compliant umbrella company arrangements.
- Auditable records of working hours to ensure compliance with the Working Time Regulations 1998.

4. Training and Red Flags for Frontline Supervisors

Our management and deployment supervisors receive training to identify specific red flags associated with temporary security staffing, such as:

- Multiple guards sharing the same home address, bank account, or telephone number.
- Operatives arriving for shifts with poor physical hygiene, lack of appropriate clothing/PPE, or showing signs of psychological coercion.
- A third party managing a worker's schedule, transport, or communication.
- Guards working excessive, back-to-back shifts across multiple sites without adequate rest periods.

5. Reporting and Whistleblowing

Any employee, temporary worker, or contractor who suspects modern slavery within our operations or supply chain must report it immediately to management.

- **Internal Contact:** Email info@sinhasecurityservices.co.uk or call **+44 7759 826816**.
- **Confidentiality:** All reports will be handled with absolute confidentiality and without fear of retaliation.



SINHA
SECURITY SERVICES LIMITED

SINHA SECURITY SERVICES LIMITED

PHONE: +44 7759 826816

EMAIL: info@sinhasecurityservices.co.uk

- **External Support:** Suspicions can also be reported directly to the **UK Modern Slavery Helpline** on **08000 121 700** or the **SIA** directly.

6. Approval

This policy is approved by the leadership of **Sinha Security Services Limited** and will be reviewed annually to reflect changing industry risks and legislative updates.

Signed: _____

Date: _____

12/09/2026

Director, Sinha Security Services Limited

Version: 10; Page 3 of 3 Date: 01.09.2026