

Humber Security Services Modern Slavery Policy 2018

Introduction

This statement sets out Humber Security Services Limited's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains.

As part of the security industry, the company recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

The company is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

Organisational Structure and Supply Chains

This statement covers the activities of Humber Security Services Limited:

- *Humber Security Services Ltd is an independent security company specialising in security services at customer premises and via remote monitoring. The Company was founded in 2013 and has achieved good levels of experience within the security industry. Humber Security Services Ltd develops partnerships with its clients, understanding their security needs and strategy; this enables the company to provide an individual service to meet the client's needs and expectations.*
- *Humber Security Services Ltd provides specialist services within the provision of security consultancy, mobile CCTV units, CCTV installation, Access control design and installation, intruder alarm design and installation, training, security guarding, mobile patrol, client Key Holding and CCTV surveillance/monitoring.*
- *The company's workforce is employed on a permanent contractual basis. All right to work, residency, Security Industry Authority and employment history verification checks are conducted in accordance with the Immigration, Asylum and Nationality Act 2006, BS7858 standards and SIA requirements.*

The company currently operates in the following countries:

- England

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There are no activities that are considered to be at high risk of slavery or human trafficking. Through the supplier/procurement selection process the Company will ensure that all suppliers will also adhere to the Modern Slavery Act 2015.

Responsibility

Responsibility for the company's anti-slavery initiatives is as follows:

- **Policies:** Managing Director and operations Manager
- **Investigations/Due Diligence:** The Operations Manager is responsible for investigations and due diligence in relation to known or suspected instances of slavery and human trafficking.
- **Training:** The Operations Manager is responsible for ensuring that the awareness of slavery and human trafficking risks are communicated throughout the company and through the supply chain.

Relevant Policies

The company operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

- **Employee Concerns (Whistleblowing) Policy:** The company encourages all its stakeholders to report any concerns related to the direct activities, or the supply chains of, the company. This can include any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The company's policy is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, customers or others who have concerns can report any activities associated to slavery and human trafficking by contacting their immediate line manager, The Operations Manager or confidentially to the Managing Director via email.
- **Supplier/Procurement Code of Conduct:** The company is committed to ensuring that its 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. As part of the supply chain selection process all potential and existing suppliers are required to provide evidence of their compliance towards Labour Standards and the principals of this standard as well as the Asylum &

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Immigration Act 2006. This enables the team to identify any potential risks to the quality of the service provision or goods being provided by the supplier and prevent any slavery or human trafficking.

- **Recruitment Policy:** Prior to commencement of employment all employees are subject to right to work, residency, SIA and employment checks in accordance with the Immigration Asylum and Nationality Act 2006, Security Industry Authority and BS7858 Code of Conduct. The Recruitment Policy is compliant to all EU and UK legislation, including the minimum wage and therefore is not at risk of slavery and human trafficking.
- **Corporate Governance & Social Responsibility Policy:** Humber Security Services Social Responsibility covers the responsibilities of the Board of Directors and the company's commitment towards the external Environment, Health & Safety, Workplace responsibilities and assurance to the supplier chain . The Policy is communicated to the whole workforce and forms part of the induction programme.
- **Anti-Bribery/Fraud Policy:** The company's Anti Bribery Policy aims to prevent any form of bribery being committed within the company and by any stakeholder(s) associated with its business. Humber Security Services Ltd Board of Directors foster a culture of integrity where bribery is unacceptable. This policy is communicated to all employees and forms part of the induction programme.

Due Diligence

The company undertakes due diligence when considering taking on new suppliers and regularly reviews its existing suppliers. The 's due diligence and reviews include:

- evaluating the modern slavery and human trafficking risks of each new supplier
- conducting supplier reviews through the Humber Security Services Operations Manager, which have a greater degree of focus on slavery and human trafficking where general risks are identified;
- If required, take steps to improve substandard suppliers' practices, including providing advice to suppliers and require them to implement action plans where applicable. Reviews carried out on Humber Security Services suppliers have confirmed that they meet the Humber Security Services Ltd supplier standards.
- If required termination of the business relationship.

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Performance Indicators

In light of the introduction of the Modern Slavery Act 2015 the company will:

- Review its existing supply chains annually

Training

The company will require all staff, including managers within the company to receive awareness training on modern slavery as a module within the company's induction, management development and refresher programmes.

The company's modern slavery awareness training will cover:

- our business' 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;
- 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;
- what initial steps 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 company;
- what external help is available, for example through the Modern Slavery Helpline, Gangmasters Licensing Authority and "Stronger together" initiative;
- what steps the company should take if suppliers or contractors do not implement antislavery policies in high-risk scenarios, including their removal from the company's supply chains.

Awareness-Raising Programme

As well as training staff, the company will ensure that the following information is communicated to all staff and is available as part of their induction pack

- the basic principles of the Modern Slavery Act 2015;

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- what employees can do to flag up potential slavery or human trafficking issues to the relevant parties within the company; and
- what external help is available, for example through the Modern Slavery Helpline.

Signed

D Brooks (Managing Director)

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Humber Security Services Ltd holds SIA approved contractor status for the provision of Security Guarding, Key Holding and Public Space CCTV services.