

Modern Slavery and Human Trafficking Policy and Statement

Omaya Cleaning Ltd

This formal policy applies to Omaya Cleaning Ltd’s commercial cleaning services in Birmingham, United Kingdom. It is intended to support responsible business practice and demonstrate the company’s commitment to preventing modern slavery and human trafficking.

Document control

Control	Details
Company	Omaya Cleaning Ltd
Business activity	Commercial cleaning services
Location	Birmingham, United Kingdom
Registered office address	75A Thornbridge Avenue, B42 2PW, Birmingham
Company registration number	15552369
Company contact email	info@omaya.uk
Document date	1 January 2026
Review date	1 January 2027
Version	2.0
Policy owner	Daniela Veleva, Director
Authorised by	Daniela Veleva, Director

Revision history

Version	Date	Description	Authorised by
---------	------	-------------	---------------

1.0	1 January 2026	Initial issue for operational use	Daniela Veleva, Director
-----	----------------	-----------------------------------	-----------------------------

Contents

- 1. Purpose and statement
- 2. Company profile and proportionality
- 3. Scope
- 4. Commitment to preventing modern slavery and human trafficking
- 5. Legal and regulatory framework
- 6. Roles and responsibilities
- 7. Risk assessment and risk-based approach
- 8. Due diligence before engagement
- 9. Recruitment and engagement standards
- 10. Subcontractor and supplier expectations
- 11. Client-site controls for cleaning work
- 12. Prohibited practices and red flags
- 13. Reporting concerns and whistleblowing
- 14. Response and investigation
- 15. Training, awareness, communication, and records
- 16. Monitoring, review, and continuous improvement
- 17. Annual statement and publication note
- 18. Director’s declaration and signature block

1. Purpose and statement

Omayya Cleaning Ltd has zero tolerance for modern slavery and human trafficking. This policy sets out the controls used to identify, prevent, report, and address the risk of forced labour, human trafficking, slavery, servitude, and exploitation in connection with the company’s activities.

Omayya Cleaning Ltd will comply with applicable UK law and client contractual requirements. The company will not knowingly work with anyone involved in forced labour, human trafficking, slavery, servitude, or exploitation. The company will follow client site rules and lawful instructions.

Policy commitment

Modern slavery and human trafficking are unacceptable in every part of Omayya Cleaning Ltd’s business and in any person or organisation acting on its behalf, where engaged.

2. Company profile and

proportionality

Omayya Cleaning Ltd is a small commercial cleaning contractor based in Birmingham, United Kingdom. The company currently has no employees. Daniela Veleva is the sole director and operator and has overall and operational responsibility for implementing this policy.

Subcontractors, temporary workers, agency workers, labour providers, suppliers, or other persons acting on behalf of Omayya Cleaning Ltd may be engaged only where applicable to a contract or authorised activity. References in this policy to such persons mean “where used” or “if engaged”; they do not imply that the company currently has an established workforce.

The company applies a proportionate, risk-based approach. Controls will be scaled to the nature of the work, the location, the engagement model, the level of supervision, and the information available about any proposed third party.

3. Scope

This policy applies to Omayya Cleaning Ltd, Daniela Veleva, and any subcontractor, temporary worker, agency worker, labour provider, supplier, or other person acting on behalf of the company where used or if engaged.

It covers cleaning services performed at client premises, arrangements with clients and other contractors, procurement of goods and services, recruitment or engagement activity, and any supply-chain relationship connected with the company’s work.

4. Commitment to preventing modern slavery and human trafficking

- Omayya Cleaning Ltd will maintain responsible working arrangements and will take reasonable steps to prevent exploitation. The company will:
- **Act lawfully and ethically** — comply with applicable UK law, client requirements, and agreed contractual controls.
- **Use proportionate checks** — obtain and retain appropriate evidence before engaging third parties where applicable.
- **Protect choice and dignity** — require work to be voluntary, fairly treated, and free from threats, coercion, or deception.

- **Raise concerns promptly** – report, record, escalate, and address suspected exploitation without delay.
- **Improve continuously** – review risks, lessons learned, contractual controls, and relevant client expectations.

5. Legal and regulatory framework

- Omayya Cleaning Ltd will consider and comply with legal and regulatory requirements applicable to its activities, including:
- **Modern Slavery Act 2015** – including offences relating to slavery, servitude, forced or compulsory labour, and human trafficking, and the principles of transparency where applicable.
- **National Minimum Wage Act 1998** and related requirements concerning lawful pay.
- **Working Time Regulations 1998**, where applicable to an engagement or working arrangement.
- **Immigration, Asylum and Nationality Act 2006** and associated right-to-work requirements, where legally required.
- **Equality Act 2010** and fair-treatment principles relevant to recruitment and work.
- **Employment Agencies Act 1973** and the Conduct of Employment Agencies and Employment Businesses Regulations 2003, where agency or labour-provider arrangements apply.
- **Gangmasters (Licensing) Act 2004** and relevant Gangmasters and Labour Abuse Authority requirements, where an activity falls within their scope.
- **Health and safety, data protection, and confidentiality requirements** applicable to the work, client premises, and records held by the company.

Legal requirements will be checked against the circumstances of each engagement. Where a client contract or site rule imposes a higher lawful standard, Omayya Cleaning Ltd will follow that requirement.

6. Roles and responsibilities

- **Daniela Veleva, Director**, is the policy owner and authorised person. Because Omayya Cleaning Ltd currently has no employees, Daniela Veleva is responsible for:
- maintaining and implementing this policy;
- assessing risks before work or third-party engagement where applicable;
- carrying out or recording proportionate due diligence;
- providing briefings to any persons engaged where applicable;
- receiving and escalating concerns;
- maintaining relevant records and reviewing this policy; and
- co-operating with clients, regulators, enforcement bodies, and other appropriate authorities.

Any person engaged by Omayya Cleaning Ltd where applicable must follow this policy,

contractual terms, client site rules, lawful instructions, and reporting arrangements. No person is expected to ignore a concern because another party appears senior or because work is taking place at a client site.

7. Risk assessment and risk-based approach

Risks will be considered before a new contract, site, supplier, labour provider, or subcontracted arrangement is accepted and when circumstances change. Relevant factors include the nature of the cleaning work, client premises, access arrangements, lone-working considerations, working hours, payment arrangements, the use of intermediaries, and the location and complexity of any supply chain.

Risk area	Potential indicators	Preventive controls	Action if concern arises
Recruitment or labour provision	Unclear identity of the provider, recruitment fees, threats, deductions, or restricted communication	Verify the provider, terms, right-to-work processes where required, pay arrangements, and worker freedom	Pause engagement, record facts, protect safety, and escalate to Daniela Veleva and appropriate authorities
Subcontracted cleaning work	Unclear supervision, unexplained substitution, excessive hours, or poor records	Written terms, identity checks, competence and insurance evidence where relevant, site induction, and monitoring	Seek clarification, increase oversight, require corrective action, or suspend work where justified
Client premises and access	Pressure to breach site rules, isolated working, unusual access requests, or coercive instructions	Follow site rules, access controls, confidentiality arrangements, lawful instructions, and lone-working precautions	Leave or secure the area if necessary, report to the client and Daniela Veleva, and preserve information
Pay, hours, and working conditions	Withheld wages, underpayment,	Agree clear terms, verify payment	Stop the arrangement where

	excessive deductions, excessive hours, or inability to leave freely	arrangements where applicable, and check for lawful working conditions	justified, investigate proportionately, and seek appropriate support
Goods and service suppliers	Opaque ownership, unusual pricing, refusal to answer questions, or credible exploitation allegations	Use proportionate supplier checks, written terms, cooperation requirements, and flow-down expectations	Escalate, request evidence, apply corrective action, or stop using the supplier

8. Due diligence before engaging third parties

Before engaging a subcontractor, temporary worker, agency worker, labour provider, supplier, or other person acting on behalf of the company, where applicable, Daniela Veleva will complete proportionate checks and retain suitable evidence. Engagement should not proceed where material concerns cannot be satisfactorily resolved.

Practical due-diligence checklist

- Confirm the person's or organisation's legal identity, trading details, and primary contact.
- Confirm the services, location, expected hours, supervision, payment basis, and duration of the proposed engagement.
- Check right-to-work evidence where legally required and appropriate to the engagement.
- Ask whether any worker will pay recruitment, placement, accommodation, transport, or other fees connected with obtaining work.
- Check that work is voluntary and that workers can leave lawful work without threats, coercion, or unlawful penalties.
- Check competence, relevant experience, insurance evidence, and licences or registrations where relevant.
- Review policies, statements, or procedures relevant to modern slavery where proportionate to the relationship.
- Confirm acceptance of written terms, client requirements, confidentiality, reporting, and flow-down obligations.
- Record checks completed, evidence considered, decisions made, and any conditions or follow-up actions.

9. Recruitment and engagement standards

- Where persons are engaged, Omayya Cleaning Ltd requires the following standards:
 - **Right to work** — right-to-work checks will be completed where legally required and records will be handled appropriately.
 - **Voluntary work** — work must be accepted freely and must not be obtained through threats, force, deception, coercion, or abuse of vulnerability.
 - **Fair treatment** — persons engaged must be treated fairly, respectfully, and in accordance with applicable law and agreed terms.
 - **No forced or child labour** — forced labour, slavery, servitude, human trafficking, and unlawful child labour are prohibited.
 - **No recruitment fees** — no recruitment or placement fee will be charged to a worker as a condition of obtaining work.
 - **Freedom to leave** — a person must be able to leave lawful work in accordance with lawful notice and contractual arrangements, without threats or unlawful penalties.
 - **Identity documents** — identity documents must not be unlawfully retained, confiscated, or controlled to prevent a person leaving or accessing help.
-

10. Subcontractor and supplier expectations

- Where applicable, subcontractors, labour providers, agency workers, temporary workers, and suppliers must:
- comply with applicable UK law and client contractual requirements;
- provide accurate information about identity, services, workers, locations, and payment arrangements when reasonably requested;
- use written terms that prohibit forced labour, human trafficking, slavery, servitude, exploitation, child labour, and worker-paid recruitment fees;
- flow these requirements down to relevant lower-tier providers where appropriate;
- provide competence, insurance, licence, registration, and right-to-work evidence where relevant and legally required;
- co-operate with proportionate checks, audits, investigations, and client requirements; and
- report suspected exploitation, unsafe working arrangements, or coercion promptly.

Failure to meet these expectations may result in additional controls, a corrective-action requirement, non-acceptance, suspension, termination, or referral to an appropriate authority, depending on the circumstances and contractual rights available.

11. Client-site controls for cleaning work

- For work at client premises, Omayya Cleaning Ltd will:
 - **Follow site rules** — comply with client induction, security, safeguarding, confidentiality, health and safety, access, and reporting requirements.
 - **Control access** — use only authorised access arrangements and never share keys, passes, codes, or confidential information without permission.
 - **Consider lone working** — take account of location, hours, communication, emergency arrangements, and any client-specific lone-working controls.
 - **Use lawful instructions** — follow lawful client instructions while reporting any instruction that appears coercive, unsafe, exploitative, or inconsistent with agreed terms.
 - **Respect confidentiality** — protect information about clients, premises, persons engaged, and any concern in accordance with applicable requirements.
 - **Report concerns** — raise suspected coercion, exploitation, unsafe working arrangements, or irregular access activity promptly to Daniela Veleva and the relevant client contact where appropriate.
-

12. Prohibited practices and red flags

- The following practices are prohibited or require immediate investigation where suspected:
- threats, intimidation, violence, harassment, or punishment used to obtain or retain labour;
- restriction of movement, isolation, surveillance, or preventing access to help;
- withheld wages, underpayment, unexplained or excessive deductions, or debt bondage;
- confiscation or unlawful retention of identity documents, phones, or personal property;
- deceptive recruitment, false promises about work, pay, accommodation, or immigration status;
- excessive hours, unsafe conditions, or pressure to work without lawful rest or agreed terms;
- forced or child labour, slavery, servitude, human trafficking, or other exploitation; and
- any inability to leave freely, seek assistance, communicate privately, or refuse unlawful work.

13. Reporting concerns and

whistleblowing

1. Any concern about modern slavery, human trafficking, coercion, exploitation, or unsafe working arrangements must be reported as soon as reasonably possible. Report the concern to **Daniela Veleva, Director**.
2. Where appropriate, report the concern to the relevant client contact under the client's site or contractual arrangements.
3. If there is immediate danger, seek immediate safety and contact emergency services or another appropriate authority.
4. Contact an appropriate authority, including the police or the Gangmasters and Labour Abuse Authority, where the circumstances warrant external escalation.

Company reporting contact: daniela@omaya.uk

Reports will be treated sensitively and confidentially as far as practicable. Omayya Cleaning Ltd will take reasonable steps to protect a person who raises a genuine concern from retaliation, victimisation, or disadvantage. Information will be shared only where necessary for safety, investigation, legal compliance, client management, or appropriate referral.

Daniela Veleva will record the concern, the date received, relevant facts, actions taken, decisions, referrals, and outcome. A concern may be raised verbally or in writing and will not be dismissed solely because the person reporting it cannot provide complete evidence.

14. Response and investigation

- When a concern is received, Omayya Cleaning Ltd will respond proportionately by:
- **Protecting immediate safety** – taking reasonable steps to remove a person from danger, obtain assistance, and avoid actions that could increase risk.
- **Preserving information** – retaining relevant messages, records, contracts, payment information, access details, and other evidence without compromising safety or confidentiality.
- **Investigating proportionately** – establishing the facts, speaking with relevant persons where safe and appropriate, and avoiding unnecessary disclosure or re-traumatisation.
- **Co-operating** – working with clients, subcontractors, regulators, enforcement bodies, and appropriate authorities as required or appropriate.
- **Taking corrective action** – requiring improvements, correcting controls, supporting safe resolution, and recording the outcome.
- **Stopping or suspending engagement** – stopping work or suspending an engagement where justified by risk, evidence, non-cooperation, contractual rights, or the need to protect a person.

No investigation will obstruct a police, regulator, or other appropriate authority investigation. Decisions will consider safety, confidentiality, legal duties, client requirements, and the reliability of available information.

15. Training, awareness, communication, and records

Because Omay Cleaning Ltd currently has no employees, Daniela Veleva will maintain her own awareness of modern slavery risks relevant to commercial cleaning and will review this policy before accepting materially different work or engaging a new category of third party.

- Where subcontractors, temporary workers, agency workers, labour providers, suppliers, or other persons act on behalf of the company, Daniela Veleva will provide or arrange a proportionate briefing covering: the company's zero-tolerance position;
- voluntary work, fair treatment, lawful pay, and prohibited practices;
- red flags relevant to cleaning work and client premises;
- site rules, confidentiality, access control, and lone-working considerations; and
- how to report a concern and obtain help.

Records will be maintained where applicable, including due-diligence evidence, written terms, briefings, site requirements, concerns, investigations, corrective actions, reviews, and relevant supplier or subcontractor communications. Records will be accurate, proportionate, secure, and retained in line with the Data Protection & Privacy Policy and applicable requirements.

16. Monitoring, review, and continuous improvement

Daniela Veleva will monitor the effectiveness of this policy through proportionate review of contracts, client requirements, engagement records, supplier and subcontractor checks, reported concerns, incidents, corrective actions, and relevant legal or regulatory developments.

The policy will be reviewed by 1 January 2027 and earlier if there is a significant change in the business, a new risk, a serious concern, a material client requirement, or a change in applicable law. Findings will be recorded and used to improve due diligence, terms, briefings, site controls, and reporting arrangements.

17. Annual statement and publication note

Omayya Cleaning Ltd will consider each year whether a formal annual modern slavery statement is legally required, taking account of the company’s size, structure, turnover, business activities, applicable law, and client or contractual expectations.

Where a formal statutory statement is not legally required, this policy will serve as Omayya Cleaning Ltd’s proportionate statement of commitment to preventing modern slavery and human trafficking. This document does not claim that a formal statutory statement has been published.

Where a formal statement is required or appropriate, Daniela Veleva will determine the content, approval, publication, and record-keeping arrangements in light of the applicable requirements at that time.

18. Director’s declaration and signature block

I, Daniela Veleva, Director of Omayya Cleaning Ltd, confirm that I have authorised this Modern Slavery and Human Trafficking Policy and Statement. I confirm that Omayya Cleaning Ltd has zero tolerance for modern slavery and human trafficking and will apply proportionate controls to the company’s activities and to any third party engaged where applicable.

I further confirm that this policy is intended to support compliance with applicable UK law and client contractual requirements, responsible commercial cleaning practice, and transparent engagement with clients and accreditation providers.

Name	Daniela Veleva
Role	Director
Date	1 January 2026