



MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT 2026

Version: 1.0

Approved by Directors: 6th March 2026

Next Review Date: 1st January 2027

Direct Staff UK Ltd holds a Gangmasters and Labour Abuse Authority (GLAA) licence (Licence No: DIRE0016) and operates in accordance with the regulatory framework governing labour providers within the UK food supply chain.

Table of contents

Introduction
Scope of Statement
Our Organisation
Sector Risk Profile
Risk Management and Safeguarding Measures
Ethical Recruitment Practices
Labour Supply Chain Due Diligence
Worker Transport and Accommodation Safeguards
Policies Supporting Ethical Labour Practices
Industry Collaboration and Regulatory Compliance
Training and Awareness
Worker Voice and Independent Reporting
Effectiveness Measures and Key Performance Indicators
Continuous Improvement
Key Definitions
Governance and Approval

Introduction

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and outlines the steps taken by Direct Staff UK Ltd to prevent modern slavery, forced labour, and human trafficking within our business operations and labour supply chains.

Modern slavery can take many forms including forced labour, human trafficking, debt bondage, coercion, and exploitation of vulnerable individuals. Direct Staff UK maintains a zero-tolerance approach to modern slavery and is committed to protecting the rights, dignity, and welfare of all workers engaged through our organisation.

As a labour provider supplying workers into sectors recognised as higher risk for labour exploitation, we recognise our responsibility to identify and mitigate risks through robust recruitment practices, worker protection measures, and continuous monitoring.

Scope of Statement

This statement applies to all operations undertaken by Direct Staff UK Ltd within the United Kingdom and covers:

- All employees of Direct Staff UK Ltd
- Temporary workers supplied to client sites
- Recruitment activities undertaken by the company
- Labour supply operations within the UK food production and logistics sectors

The statement reflects our commitment to maintaining ethical labour standards across our operations and labour supply chains.

Our Organisation

Direct Staff UK Ltd is a UK-based temporary labour provider supplying workers across multiple locations within the United Kingdom.

We specialise in the supply of labour into sectors including:

- Food manufacturing
- Poultry processing
- Fresh produce packing
- Warehousing and logistics

These sectors form part of the UK's critical food supply chain and rely on temporary labour to support operational demand.

Direct Staff UK operates under the GLAA licensing scheme, which regulates labour providers supplying workers into agriculture and food processing sectors. Compliance with GLAA licensing standards forms a core element of our safeguarding framework.

Sector Risk Profile

The labour supply sector has been identified by the UK Government and regulatory authorities as having potential exposure to labour exploitation risks.

Direct Staff UK has assessed its operations and identified areas where potential vulnerabilities may arise, including:

- Recruitment of migrant workers or workers whose first language is not English
- Temporary labour supply within food processing and agricultural sectors
- Workers relying on shared accommodation or transport arrangements
- Potential third-party labour intermediaries
- Workers with limited awareness of employment rights

While these factors do not indicate exploitation, they highlight areas where enhanced monitoring and worker protection measures are necessary.

Risk Management and Safeguarding Measures

Direct Staff UK operates a range of compliance and safeguarding processes designed to mitigate risks associated with labour exploitation.

Worker Registration and Identity Verification

All workers must complete a structured registration process prior to commencing employment. This includes:

- Identity verification
- Right to Work checks in accordance with Home Office requirements
- Confirmation that employment is undertaken voluntarily
- Direct bank account verification to ensure wages are paid directly to the worker

These procedures help ensure workers are engaging with the agency freely and without third-party control.

Payroll and Data Monitoring

Direct Staff UK conducts routine monitoring of payroll and worker data to identify potential indicators of exploitation.

Monitoring activities include:

- Duplicate bank account checks
- Duplicate address monitoring
- Payroll pattern analysis
- Identification of unusual financial arrangements

Any anomalies identified through these checks are investigated by the company's compliance team.

Worker Welfare Monitoring

Worker welfare is central to our safeguarding approach.

Measures include:

- Worker welfare interviews during assignments
- Regular engagement with workers on client sites
- Confidential escalation procedures
- Support for workers who may require translation assistance

These procedures help ensure workers feel able to raise concerns safely and confidentially.

Ethical Recruitment Practices

Direct Staff UK is committed to ethical recruitment practices and ensuring that workers are not exposed to exploitative recruitment processes.

The company operates under the following principles:

- Workers are recruited directly by authorised Direct Staff UK personnel.
- Workers are never charged recruitment or work-finding fees.
- Workers are informed of the nature of the work, pay rates, and working conditions before starting employment.
- Workers receive Key Information Documents outlining employment terms prior to commencing assignments.

Direct Staff UK operates in accordance with internationally recognised ethical recruitment principles, including the principle that no worker should pay for a job. The company is committed to ensuring that recruitment fees and related costs are not charged to workers at any stage of the recruitment process.

Where recruitment involves migrant workers or cross-border labour supply chains, additional due diligence is undertaken to ensure workers have not been charged recruitment fees by third parties.

Labour Supply Chain Due Diligence

Direct Staff UK recognises that labour supply chains can present risks where workers are sourced through intermediaries or unauthorised labour providers.

To mitigate these risks, Direct Staff UK maintains strict control over labour sourcing activities.

Our due diligence processes include:

- Recruitment conducted directly by authorised Direct Staff UK personnel
- Prohibition of unauthorised labour intermediaries or labour brokers
- Verification that all workers are fully registered and compliant prior to assignment
- Monitoring recruitment channels to ensure workers have not paid recruitment fees
- Ensuring labour supply operations remain compliant with GLAA licensing standards

Direct Staff UK does not permit the use of unauthorised sub-contracted labour and retains full responsibility for the recruitment and engagement of workers supplied to clients.

Worker Transport and Accommodation Safeguards

In some circumstances workers may use shared transport or accommodation arrangements linked to employment.

Direct Staff UK recognises that such arrangements can present potential risks if not managed appropriately.

To safeguard workers:

- Workers are not required to use company-arranged accommodation.
- Workers receive clear information regarding any accommodation costs.
- Workers retain control of their personal identification documents at all times.
- Workers are paid directly into their own verified bank accounts.
- Workers remain free to leave employment in accordance with their contractual terms.

Policies Supporting Ethical Labour Practices

Direct Staff UK maintains a framework of policies supporting ethical labour practices and worker protection.

These include:

- Ethical Trading Policy
- Anti-Bribery and Corruption Policy
- Whistleblowing Policy
- Safeguarding Policy
- Equal Opportunities Policy

These policies define the standards expected of employees, workers, and business partners.

Industry Collaboration and Regulatory Compliance

Direct Staff UK actively supports industry initiatives aimed at preventing labour exploitation and improving worker protection.

The company operates in accordance with the standards and regulatory frameworks established by:

- The Gangmasters and Labour Abuse Authority (GLAA)
- The Modern Slavery Act 2015

Where concerns regarding labour exploitation arise, Direct Staff UK will cooperate fully with relevant authorities including the GLAA and law enforcement agencies.

Training and Awareness

Training is an essential element in preventing modern slavery.

Internal Staff Training

All internal staff receive modern slavery awareness training during induction. This training covers:

- Understanding modern slavery and hidden labour exploitation
- Recognising indicators of worker vulnerability
- Safeguarding responsibilities
- Reporting and escalation procedures

Training is refreshed periodically.

Management and Compliance Training

Management and compliance personnel receive enhanced training to support safeguarding and monitoring responsibilities.

Worker Awareness

Workers are provided with information regarding:

- Their employment rights
- How to raise concerns
- Access to confidential support services and helplines

Where possible, information is communicated in a language workers understand.

Worker Voice and Independent Reporting

Direct Staff UK recognises the importance of ensuring workers have access to independent channels for raising concerns.

Workers are encouraged to report concerns through:

- Direct communication with agency representatives
- Confidential whistleblowing procedures
- External organisations such as the Modern Slavery Helpline

Information about support services and reporting channels is made accessible to workers to ensure concerns can be raised safely and independently where necessary.

Effectiveness Measures and Key Performance Indicators

Direct Staff UK monitors internal compliance indicators to assess the effectiveness of its modern slavery prevention measures.

During the reporting period:

- 100% of workers underwent Right to Work verification prior to assignment
- 100% of workers were paid directly into verified personal bank accounts
- 100% of internal staff received modern slavery awareness information
- Regular monitoring of duplicate bank accounts and addresses was conducted
- Worker welfare interviews were undertaken across client sites
- Zero confirmed cases of forced labour were identified during the reporting period

Continuous Improvement

Direct Staff UK remains committed to strengthening its safeguarding framework.

During the reporting year the company enhanced its worker onboarding procedures and strengthened payroll monitoring processes.

Future priorities include continued training, monitoring, and review of safeguarding procedures.

Key Definitions

Modern Slavery

An umbrella term used to describe situations where individuals are exploited and cannot refuse or leave work because of threats, coercion, deception, or abuse of power.

Forced Labour

Work or services that individuals are compelled to perform against their will under threat of penalty.

Human Trafficking

The recruitment, transportation, or harbouring of individuals through coercion or deception for the purpose of exploitation.

Hidden Labour Exploitation

Situations where workers are exploited by individuals or groups without the direct knowledge of the employer.

Governance and Approval

Responsibility for modern slavery prevention sits with the Senior Leadership Team of Direct Staff UK Ltd, supported by the company's compliance function.

The Board of Directors accepts ultimate responsibility for ensuring the organisation operates in accordance with the Modern Slavery Act 2015 and that effective safeguards remain in place to prevent labour exploitation.

This statement has been approved by the Board of Directors and will be reviewed annually.

Signed on behalf of Direct Staff UK Ltd

Name: Rikvinder Hear

Position: Managing Director

Date: 6th March 2026

R. Hear