

**Brightwork**  
Staffline

# Modern Slavery Statement: 2025–2026

April 2025



Enabling  
People Into  
Good Work



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# Executive Summary

This statement reviews the actions outlined in Brightwork Modern Slavery Statement (2025-2026), renews our commitments, and records our progress and future plans to continue tackling Modern Slavery and trafficking/exploitation.

We take pride in the progress and accomplishments we've made towards the following objectives since our last statement.

These efforts have helped to further improve and strengthen the standards and controls within our business, with some key highlights outlined below:

1. Continued to enhance internal processes and procedures to mitigate risks, including the development of our comprehensive Quality Management System ('QMS'), maintaining the ISO 9001 Standard achieved in 2023 and obtaining the ISO 14001 (Environmental Management System 'EMS') Standard in 2025 for our Staffline, Brightwork, and Omega businesses.
2. Ongoing development and reviews of stakeholder relationships, particularly our supply chain.
3. Identified and reported new potential risk indicators to government authorities, receiving recognition for our insights and ongoing efforts in this area.
4. Conducted extensive education and awareness campaigns for all employees through various mediums.
5. Completed audits of our labour suppliers and implemented necessary actions.
6. Actively supported the Staffline Group ESG Committee and contributed to the production and publication of the 2024 ESG Report.
7. As part of the Staffline Group, Brightwork has achieved a silver EcoVadis rating, ranking Staffline in the top 15% of companies audited by EcoVadis in the last 12 months.
8. Used the CCLA's Modern Slavery UK Benchmark to review and identify continuous improvement plans.
9. Brightwork fully fund and administer Scotalnd Against Modern Slavery (SAMS), Scotland's leading anti-slavery network.

Many of these performance measures will be continued throughout 2025-2026 and are detailed within this statement.

# Introduction

Modern Slavery is a criminal offence and has various guises such as slavery, servitude, forced labour and human trafficking. This violation of human rights is abhorrent and Staffline has a zero-tolerance approach to Modern Slavery, exploitation, and human trafficking

As a leader in recruitment, Brightwork is committed to creating ethical and exciting employment opportunities. We take our responsibility seriously, striving to disrupt exploitation and tackle Modern Slavery, ensuring worker welfare is central to everything we do. We believe working to prevent Modern Slavery is one of our highest priorities and we work alongside other businesses, charities and organisations that take this matter as seriously as we do.

For over 9 years, Staffline, as the parent company of Brightwork, has published annual Modern Slavery Statements, outlining our aims, objectives, and preventative measures. Our commitment aligns with the Ethical Trade Initiative (ETI) base code guidance, and we continually review and improve practices in accordance with these standards. We strive to effectively consider the ETI 'Principles of Implementation' throughout our Modern Slavery Statement review, utilising continuous improvement plans and review mechanisms throughout the year.

We are, however, aware this is an ever-evolving crime, and its nature is complex and ever changing. The current economic climate, and ongoing global conflicts and crisis are still prevalent in our minds. These scenarios create opportunities for exploitation and Modern Slavery, where vulnerable people are keen to provide for themselves and their families.

It is devastating to know that criminals see this as an opportunity for financial gain through various means such as promising guaranteed work, housing, and transport, to name just a few.

Our experience grows year after year, working closely with the Gangmasters Labour Abuse Authority (the 'GLAA'), the Home Office, the police forces across the country, and through collaborating and sharing insights with anti-slavery networks in all regions of the UK. Brightwork supports working together to eradicate this criminal activity, sharing valuable insights that enable us to refine our compliance measures and enhance our safeguards and target our training across our business.

At Brightwork, we are committed to providing a safe, secure environment where individuals can thrive. We are honoured to support survivors of Modern Slavery, working closely with multiple agencies to provide opportunities for fair and safe working environments for all.

The UK Home Office released data at the end of 2024, stating **19,125** potential victims (referred to authorities) of Modern Slavery in the UK. **23%** of people referred were British Nationals. **31%** of these were children.

(Anti-slavery International 2025)

## About Us

Established in 2006, Brightwork is Scotland's largest recruiter and workforce provider, delivering recruitment and workforce solutions to leading brands. We work together with our customers as an integrated business partner, operating at over 150 delivery sites across Scotland.

Brightwork focuses on helping business to find the right people for their organisation, while also helping candidates to find the right job opportunities. We have a team of experienced recruiters who are knowledgeable about various industries and can provide expert advice and support throughout the recruitment process.

As a trusted and reliable recruitment agency, Brightwork provides customised recruitment solutions to meet the unique needs of each customer, which are underpinned with our compliance and ethical standards throughout the recruitment journey and worker experience. Our focus is to help businesses to find the right people for their organisation, while also helping candidates to find the right job opportunities. We have a team of experienced recruiters who are knowledgeable about various industries and can provide expert advice and support throughout the recruitment process.

Our services are supported with innovate technologies which include Staffline's bespoke candidate/worker management tool 'Universe', our industry-leading customer experience management programme and survey tool 'Have your Say', and our integrated AI chat bot technologies which offer assistance and promptly addresses inbound queries, ensuring our candidates and workers are directed to the appropriate destination on their first attempt.



# Organisational Structure & Supply Chain

Brightwork is a Scotland-based recruitment agency that specialises in providing recruitment and workforce management solutions to businesses in various industries. With branches located in Glasgow and Elgin, we support our customers from the Borders up to the Central Belt, spanning across to the Western Isles and extending to the most northerly points of Scotland. Providing onsite solutions services to 20+ locations across the Central Belt, we have a permanent presence within our customers' sites, providing a dynamic and flexible resourcing service, on location, right at the heart of their businesses.

Brightwork is a subsidiary of Staffline Recruitment GB; one of four divisions along with Datum RPO, PeoplePlus and Staffline Recruitment Ireland, which form Staffline Group Plc.

For more on our structure please visit the [Staffline Group Plc website](#).

We have 50 recruitment suppliers, the majority of which are registered in the UK. Those that are not based in the UK are EU based and hold a UK Gangmaster Licencing Abuse Authority (GLAA) licence to operate in the UK. All suppliers are audited at the point of our initial engagement and then annually on an ongoing basis.

## Staffline & Brightwork Supply by Sector (2021 – 2024)

Sector(s)	2024	2023	2022	2021
Automotive and Manufacturing	16%	13%	6%	5%
Driving	10%	8%	13%	13%
Food & Drinks (and related)	56%	60%	65%	65%
Retail and Logistics	14%	17%	15%	15%
Other	4%	2%	1%	1%



### Our Focus

Brightwork is committed to delivering responsible ethical recruitment solutions to a range of private and public services to find and support people into employment and develop skills. We do this through fair and clear terms, development opportunities, an equal opportunities policy for all, and safe, respectful, clean, and healthy work environments.

### Our Values



Brightwork's goal is to support people into good work to enable our workforce and our customers to fulfil their goals and aspirations. We achieve this through our company values and our human-centric approach, and this is embedded in our daily behaviours and our work with stakeholders.

At the heart of our business are the individuals we support into work; for example, by implementing AI technology we have improved our job search facilities to support the individual to 'Find Me Work', and we will continue to innovate. These dynamic solutions allow us to focus on an individual's journey, identify any concerns, and to provide support along the way.

We have a forward-thinking and market-leading People team who work hard to help embed the culture of Brightwork, promoting important topics such as Women in Leadership, Pride Month, Mental Health Awareness, Neurodiversity Celebration Week, and Anti-Slavery campaigns.

During 2023, a key objective was to strengthen our relationships and collaborative partnerships with charitable organisations which we successfully achieved. In 2024 we focused on supporting cases, providing more employment opportunities and working with our valued customers.

Brightwork across its portfolio have increased our employment opportunities **14.5%** (based on the number of hours of work completed), we remain worker centric and ensure individuals requests are respected. We have worked collaboratively with clients and authorities on several suspected Modern Slavery cases and will continue to work in collaboration with likeminded businesses.

Our commitment to eradicating Modern Slavery permeates our operations and supply chains, underscoring our unyielding commitment against slavery and human trafficking. We uphold our brand **values** consistently throughout our business practices and refuse to partner with any organisation that engages in slavery or human rights violations.

# Policy Statement

Brightwork has a zero-tolerance approach to Modern Slavery and human trafficking in all our operations and supply chains. We acknowledge that slavery and human trafficking are serious human rights abuses that have no place in modern society.

We will conduct our business with integrity and will not knowingly support or deal with any business involved in slavery or human trafficking. We expect our suppliers, contractors, and other business partners to share our commitment to preventing slavery and human trafficking.

To fulfil our commitment, we will:

1. Conduct due diligence checks to identify and assess potential Modern Slavery risks in our operations and supply chains.
2. Take appropriate action to address any identified risks and work with our suppliers and partners to improve their practices.
3. Provide training to our employees and suppliers to increase awareness of Modern Slavery and how to identify and report any potential cases.
4. Support our customers and suppliers by sharing our experiences to help with their employee awareness and policy/processes development.
5. Encourage and support the reporting of any suspected cases of Modern Slavery and human trafficking.
6. Regularly review and monitor our policies and practices to ensure that they remain effective in preventing Modern Slavery and human trafficking.
7. Protect our employees; against any human rights violations, their freedom of movement and association, against unfair recruitment practices and ensure they have access to internal and external grievance mechanisms.

We are committed to continuously improving our efforts to prevent Modern Slavery and human trafficking and to comply with all relevant laws and regulations.

Our company policies are hosted on a live environment for all employees to access at any time and are supported with the additional awareness-checking learning materials on our learning experience platforms.

Our policies support our commitment to protect human rights and eradicate Modern Slavery and unethical practice.



# Due Diligence

Brightwork conducts rigorous due diligence on all labour suppliers to ensure compliance with our ethical standards and values. We take decisive action against non-compliance and support suppliers in meeting our high standards through education and risk-based assessments aligned with the Government's Modern Slavery Assessment Tool ('MSAT').

Our Modern Slavery due diligence focuses on proactively reducing forced labour and human trafficking risks across our operations and supply chains. We collaborate with NGOs, authorities, and stakeholders to share knowledge and implement adaptive development plans. Our approach leverages technology to identify red flags, utilising data analytics, audit reports, and our internal investigation team's insights. This approach enables us to apply valuable lessons from real-world case studies, ensuring that the protection of human rights remains central to our actions.

In 2023, we achieved ISO 9001 Standard (Quality Management System) certification and received a 'Silver Medal' EcoVadis rating in 2024, placing us among the top 15% of assessed companies. In early 2025 we have successfully achieved the ISO 14001 Standard (Environmental Management System) certification, and plans are in place for the ISO 27001 (Information Security Management System) Standard certification in 2026.

Brightwork are registered with Sedex and have a completed Self-Assessment Questionnaire (SAQ), assessing site practices on labour, health & safety and more to identify and manage social risks. We currently have a 'management controls' score of 'Good'.

Our practices align with the UK Modern Slavery Act, UN Guiding Principles on Business and Human Rights, OECD's Six-Step Due Diligence Framework, and CCLA's Modern Slavery UK Benchmark.



# Training & Awareness

At Brightwork, educating and engaging all stakeholders is central to our efforts against Modern Slavery.

From day one, all new team members complete mandatory training on this topic through our online platform and supplementary training relevant to our business and risks is delivered according to need.

Our workforce receives comprehensive information during their inductions, supported by our Worker Handbook—available in ten languages—which provides guidance on accessing help and support and is routinely reviewed to strengthen the Modern Slavery information and included some signposting advice for workers.

Our 7 Red Flags program simplifies the identification of Modern Slavery indicators, reinforcing awareness across our teams, workforce, and stakeholders including various communication channels such as our website, social media platforms, and associated marketing materials.

This initiative educates individuals on recognising and reporting suspected cases, fostering a culture of open reporting even in instances with limited evidence. Our training and 'red flags' framework align with the International Labour Office's 'ILO Indicators of Forced Labour'.

Any suspicions of Modern Slavery are promptly reported to our Compliance team, comprising of experienced professionals with backgrounds in law enforcement and regulatory compliance, including the Gangmasters Labour Abuse Authority (GLAA). This team conducts thorough and impartial investigations, following up on intelligence leads or complaints to safeguard worker welfare and ensure Staffline's compliance with regulations.

Additionally, members of our Compliance Investigations team undergo training, including the Stronger Together Advanced Tackling Modern Slavery in Business course, to enhance their expertise in addressing Modern Slavery issues. The quality of our intelligence sharing has been acknowledged by the Home Office and received several appreciative remarks from other authorities in recent years.

Brightwork prohibits any form of payment from employees or workers for employment purposes, as well as retention or withholding of personal identity documents. We unequivocally reject forced or bonded labour practices. Allegations of such actions are diligently investigated by our independent Compliance Investigations team.

Furthermore, we conduct awareness campaigns targeting our potential workforce to educate and raise awareness about potential scams and criminal behaviours, furthering our commitment to combating Modern Slavery in all its forms.

# Key Performance Indicators & Risk Assessments

Brightwork comprehensively monitors and reports on our efforts in preventing Modern Slavery and human trafficking across our operations. We regularly review our policies and procedures through internal and external risk assessments, including our partnership with the 'Stronger Together' initiative, ensuring thorough coverage in our risk mitigation strategies.

## Business-Specific Performance Indicators:

We have established targeted performance indicators across our portfolio to evaluate the effectiveness of our anti-Modern Slavery actions:

1. Modern Slavery gap analysis of our overarching business operations based on UNGP's, CCLA's initiatives, Stronger Together directives, and ETI base code
2. Self-assessed scored reviews conducted at site level
3. Enhanced Modern Slavery screening questions throughout worker engagement
4. Detailed tracking of investigation cases, including time-to-resolution metrics initiated in 2022
5. Maintenance of Modern Slavery training delivery above 95% for all staff

## High-Risk Sector Recognition and Mitigation:

We acknowledge that some of our operations exist within high-risk sectors such as food processing and warehousing. Our diverse workforce includes migrant labourers who may face increased risk if their understanding of human rights is limited. In response, we have:

1. Developed bespoke training sessions for high-risk sectors and vulnerable demographic communities
2. Optimised our UK-based labour pool in 2024, significantly reducing reliance on overseas labour agencies
3. Established protocols for rigorous auditing should external labour sourcing resume

## Proactive Identification and Reporting Mechanisms:

A crucial measure of our success lies in the number of investigations conducted and potential victims of Modern Slavery identified within our business. Given the scale and scope of Staffline's operations, we recognise the likelihood of being targeted by criminals seeking to exploit our business. The systematic review of cases over the years has revealed new insights and demonstrates our commitment to delivering robust training to detect, report, and prevent this abhorrent crime (see next page).

Year	Number of Investigations	Number of Potential Victims of Modern Slavery
2019	41	33
2020	67	19
2021	68	76
2022	52	70
2023	40	103 (+69 imposters)
2024	31	19 (+329 imposters)

In 2023, we identified concerns for potential victims of Modern Slavery or exploitation through various investigations, such as Right to Work inquiries. During 2024 we have focused our efforts in this area to try and **prevent** Modern Slavery and exploitation entering our business.

We are pleased to confirm that while our number of Modern Slavery investigations reduced, we identified 329 imposters attempting to infiltrate our organisation and we worked alongside the Home Office to support profiling these potential victims and supplied additional evidence on 169 individuals.

## Overview of Actions & Progress

1. Reviewed and improved our workforce surveys to ask more relatable and comprehensive Modern Slavery questions.
2. Implemented worker Modern Slavery assessments at onboarding for high risk and adhoc use.
3. Implemented targeted thematic training to operational staff to drive awareness in specific areas and topics of the business
4. Provided new trend data to Home Office supporting new victim identification

	2022	2023	2024	Commentary
Reports and Investigations into Modern Slavery and related concerns	52	40	31	<b>Protect:</b> During 2024 we developed our reporting which has resulted in defining some cases as ‘other’ investigation types allowing us to support our work force more appropriately. We also had a significant increase in supporting authorities with disclosures to progress their investigations and preventing potential cases of Modern Slavery from accessing our business by improving our processes.
Disclosures to authorities	28	37	135	<b>Partner &amp; Prosecute:</b> providing witness statements, supporting investigations, civil suits and such related enquiries from authorities
Imposters reported to the Home Office	Not recorded	69	129	<b>Prevent:</b> Identifying potential instances of Modern Slavery and exploitation from entering our supply chain.
Whistleblowing Reports	Not recorded	9	27	<b>Protect:</b> Supporting and encouraging reporting of any concerns across our business to ensure we address and protect our workforce.

N.B. Year-on-year, we have enhanced our data collection methods, impacting the figures presented. Our focused efforts to prevent Modern Slavery within our operations are evidenced by the increase in imposter identifications. We maintain a culture that encourages reporting concerns and proactively identifying human rights violations, particularly regarding Modern Slavery and exploitation.

The table below shows measures implemented by Brightwork in recent years and provides some commentary on the status of each measure and future or ongoing actions being progressed (table continues on next page).

Measure	Commenced	Status	Concluded Actions	Ongoing Actions
Take appropriate action to address any identified risks and work with our suppliers and partners to improve their practices.	2022	Ongoing	<ul style="list-style-type: none"> <li>- Labour suppliers reduced and audited with a full review completed of the audit process during 2023.</li> <li>- Suppliers contacted to review practices and audit Modern Slavery commitments.</li> <li>- Focus on using UK based labour suppliers, preferably GLAA licenced.</li> <li>- Round table workshops have been delivered via SAMS and Staffline.</li> </ul>	<p>Update our standard terms and conditions to include contractual commitments.</p> <p>Continue engaging in anti-slavery working groups</p>

Measure	Commenced	Status	Concluded Actions	Ongoing Actions
Provide training to our employees and suppliers to increase awareness of Modern Slavery and how to identify and report any potential cases.	2020	Annually & Ongoing	<ul style="list-style-type: none"> <li>- Achieve 100% completion of annual training for employees.</li> <li>- Create and distribute materials to further knowledge of modern slavery and exploitations (such as our Red Flags material, and Anti-Slavery Day campaign materials).</li> <li>- Create new targeted Modern Slavery training for new staff in addition to mandatory training.</li> <li>- Initial roll out of targeted presentation tailored to stakeholder groups i.e. logistics, warehousing, geographical hotspots.</li> </ul>	Create 2-minute talks on key areas
Support our customers and suppliers by sharing our experiences to help with their employee awareness and policy/ processes development.	2020	Ongoing	<ul style="list-style-type: none"> <li>- Developing and maintaining key relationships with customers is and will always be ongoing.</li> <li>- Connected with third party vendors to discuss and review Modern Slavery awareness.</li> <li>- Collaborative and educational round tables have been rolled out.</li> </ul>	Continue round table/ training session to raise awareness, share case studies and build contacts within target hotspot areas.
Encourage and support the reporting of any suspected cases of Modern Slavery and human trafficking.	2021	Ongoing	<ul style="list-style-type: none"> <li>- Created control logs to monitor develop insights into investigations.</li> <li>- Raising awareness and support to encourage reporting via training and educational tools has been evident in the number of internal cases reported (<i>2021-2022 saw a 6.6% increase, 2022-2023 saw a 42.4% increase*</i>).</li> </ul>	<p>Continue to encourage and train staff and workers to raise reports for all suspicious activities.</p> <p>Drive increases in reporting figures by promoting teamship and communication.</p>
Regularly review and monitor our policies and practices to ensure that they remain effective in preventing Modern Slavery and human trafficking.	2020	Ongoing	<ul style="list-style-type: none"> <li>- Quality Management System developed and implemented; ISO 9001 Standard achieved in 2023.</li> </ul>	Ensure effectiveness and relevance of policies across the business and maintain the ISO 9001 Standard certification.
Protect our employees; against any human rights violations, their freedom of movement and association, against unfair recruitment practices and ensure they have access to internal and external grievance mechanisms.	2020	Ongoing	<ul style="list-style-type: none"> <li>- Developed the worker handbook and published in other languages to support accessing help and reporting mechanisms.</li> <li>- Ensure adequate training is provided and campaigns are accessible.</li> <li>- Attend hotspot areas with the support of customers to directly access workers to educate and inform of indicators and internal and external reporting mechanisms.</li> </ul>	<p>Continue engagement with the support of customers to directly access workers to educate and inform of indicators and internal and external reporting mechanisms.</p> <p>Attend government meetings to support shaping new legislation and policy.</p>



# Collaboration & Communication

We communicate consistently with our suppliers, customers, and stakeholders to ensure awareness of our commitment to preventing Modern Slavery and human trafficking in recruitment practices. Collaboratively, we identify, mitigate and address risks while share best practice. Our experienced team engages with external HR and management teams to enhance awareness, identify support functions and implement effective processes.

We maintain a close working relationship with the Gangmaster and Labour Abuse Authority (GLAA) and other relevant authorities, promptly reporting all cases or suspicions of Modern Slavery offences. This diligence has earned us recognition in several cases for the intelligence and support provided to authorities and affected individuals. During 2023, our Compliance Investigations team's intelligence sharing resulted in over 15 cases advancing to criminal proceedings, this has increased in 2024 to 19 cases; 10 of these have been as a direct result of the intel provided to authorities by Staffline.

We work continuously to try and prevent unlicensed gangmasters from infiltrating our business and exploiting our workers and regularly engage with authorities and charities to tackle Modern Slavery, including Survivors of Human Trafficking in Scotland, TARA, International Justice Mission and Refugee Sanctuary Scotland.

Additionally, we actively participate in the 'Stronger Together' initiative, utilising the Responsible Recruitment Toolkit to keep Modern Slavery high on ethical agendas.

When supporting victims identified, we collaborate with enforcement authorities and charities to ensure appropriate support and a victim-centric approach. The collaboration has facilitated the successful engagement of 47 survivors of Modern Slavery over the last four years, which we have been able to offer roles across our network. We conduct case reviews with the Police and GLAA, where appropriate involving other labour suppliers and customers, to collectively enhance learning opportunities.

Our compliance reports provide valuable insights that we actively share these with local authorities. These insights include indicators of potential Modern Slavery or exploitation, such as illegal houses of multiple occupancy, overcrowding, shared bank account details, and telephone numbers. Our proactive approach has contributed to preventing worker welfare issues and the apprehension of abusers.

As business partners with the Stronger Together initiative, we implement their practical guidance throughout our organisation. Our Compliance Investigations team and Governance Director have completed advanced training in tackling Modern Slavery. We adhere to the Labour Provider/Recruitment Business Good Practice Implementation Checklist, reviewed annually.

We take pride in our partnerships with dedicated charities and organisations, including Hope for Justice, West Midlands Anti-Slavery Network, Unseen and City Hearts. It is an honour to contribute to their important work by offering reconditioned devices and work placements to survivors, helping them to rebuild their lives with renewed hope and purpose.

Our involvement in anti-slavery networks continues to grow each year, with more organisations joining to expand their reach and share in our commitment to combatting Modern Slavery. We are also fortunate to work closely with OnePay, an approved alternative payment solution for our workers, to swiftly and thoroughly investigate any suspicions of Modern Slavery or fraudulent account usage.

We are incredibly proud to have hosted approximately 200 people from a range of leading business at 6 round table Modern Slavery focused events during 2024, and that other organisations have continued to utilise our worker rights leaflet to help spread awareness about labour rights and the expectations for working in the UK. This year, we are excited to increase our round table events and develop business communities that strive to support the same aims as Staffline.

Raising awareness among our clients and their supply chains is a core passion, and we actively seek new partnerships and conversations to help keep Modern Slavery prevention at the front and centre, which is demonstrated by the 'SAMS' initiative.

Scotland Against Modern Slavery ('SAMS') is fully funded and operated by Staffline and Brightwork as a joint initiative with Police Scotland, the GLAA, and the Scottish Government. 62 businesses have joined this initiative from across the Scottish business community, with the core aims of:

- Raising awareness of the issue of exploitation in the business community in Scotland and sharing best practice.
- Supporting survivors with full time good work with the corporate partners.
- Raising awareness with those communities who are vulnerable to exploitation.

Collaboration has been instrumental in fostering clear communication, sharing knowledge, and exchanging best practices. By embracing teamwork and a unified approach, we strive to strengthen our collective ability to tackle Modern Slavery and make a meaningful impact.



## Case Study

In 2024, we identified 31 potential cases of Modern Slavery or exploitation. We have faced significant number of individuals who have declining to confirm our concerns; all concerns have been investigated and reported to authorities and ongoing monitoring and support have been made available to any individuals impacted.

What we are extremely thankful for is that our operational teams demonstrate they are aware and alert to the signs of Modern Slavery and report concerns to the dedicated team to investigate.

During 2024 operations flagged concerns for two individuals who were walking to work which is a remote location with a lack of good footpaths. Both individuals showed signs of Modern Slavery; withdrawn, looking exhausted, anxious and did not engage in typical conversation regarding their “free time”.

We identified they were being supported by a government-backed scheme and the hosts they were residing with were treating the individuals abhorrently.

Our dedicated team were able to attend site and speak to the individuals, remove them from their current scenario at ‘home’ and support them to their ideal resolution, which was their own residence, to continue to work and pursue education. Offers to enter the government NRM were declined.

They were supported by several authorities and us to regain their freedoms, their belongings, settle and feel safe in their new residence and reassurance was given that their roles were safe, and we were all available to support them further.

We have remained in contact with the individuals who have flourished in their own environment. Unfortunately, the case against the perpetrators is still ongoing.

In our review of this case, it became clear that the individuals were not given enough opportunity or awareness to identify themselves as ‘Modern Slavery victims’ and while we appreciate very few individuals will ever identify in such a way, we have implemented additional reporting requirements at the point of registration and through the onboarding journey to help us as a business remotely identify red flags alongside our operational team observations.

Access to remedy is also fundamental for us as an organisation, this remains led by the individual and collaboration with our clients, suppliers and external relevant stakeholders is considered in all cases.

# Governance & Oversight

Our policies and accountability mechanisms are central to effectively identifying, preventing, and addressing Modern Slavery risks. In 2023, Staffline implemented a comprehensive Quality Management System, achieving ISO 9001 certification, which demonstrates our commitment to rigorous quality standards. Furthermore, at the beginning of 2025, Staffline achieved the ISO 14001 Standard certification for its Environmental Management System, which has provided the independent assurances of its policies and procedures to ensure sustainable and ethical practices.

Staffline's Governance Director provides strategic leadership for our anti-slavery framework, ensuring Modern Slavery considerations remain integral to all strategic business decisions and operations across the organisation. Our board of directors maintains full commitment to fostering a culture of zero tolerance towards Modern Slavery, a commitment which is clearly communicated throughout the business. Ethical behaviour is embedded in our core values, and we remain dedicated to upholding these standards throughout our operations.

Our policies reflect the principles of safeguarding worker welfare, which remain at the core of our business and reflected within all processes and management arrangements. Our comprehensive approach includes scheduled annual internal audits such as the Sedex Self-Assessment Questionnaire and Sedex SMETA audits, complemented by unannounced external audits to identify, assess, and mitigate Modern Slavery risks within our operations and supply chain. Through diligent due diligence processes, we thoroughly investigate any instances of potential Modern Slavery and implement corrective actions wherever necessary.

Investment in our technology, enable us to run comprehensive checks across our database and supporting platforms, enabling us to provide prompt, accurate and valuable information to enforcement authorities. Furthermore, the application of structured data within our reporting tools allows for greater levels of automation and has helped Staffline create 'insight dashboards' using innovative management information software packages. The outputs of this work mean that our internal teams can focus more of their time and energy on investigations and follow-up activities, and thus our impact of this data will strengthen over time.

Internal audit protocols ensure that Modern Slavery information is prominently displayed across all offices and sites, confirming staff are familiar and compliant with policies and processes designed to protect worker welfare. We maintain a centralised repository of company policies, ensuring comprehensive access and visibility for all staff members. Regular communications via multiple digital channels regarding policy updates and organisational principles ensure consistent staff awareness and understanding.

Brightwork has submitted an annual Modern Slavery statement for more than 9 consecutive years, with ongoing reviews and improvements, demonstrating our commitment to transparency and accountability. We keep our stakeholders informed of our progress and plans for improvement, and our Environmental, Social, and Governance (ESG) Report details our dedication to fostering a positive impact on people, communities, and society. This public reporting reflects our continuous efforts to develop a responsible, ethical, and socially conscious organisation.

Our internal review processes drive continuous improvement, including regular updates to our Modern Slavery Statement and supporting policies and procedures, to comply with the UK Government statutory guidance to cover six key pillars. We are committed to implementing effective, meaningful change to continue to tackle Modern Slavery across our business.

The internal compliance investigations team conducts root cause analysis and implements continuous improvement measures and training across our company. Where appropriate we endeavour to remedy and support any individuals to seek justice and compensation.

## Policies

We have a range of policies that reiterate our stance against Modern Slavery an overview of these is detailed below all are updated annually in line with our ISO 1901 Quality Management System commitments:

Policy Name	Overview
Group Whistle-blowing Policy	Details how to report any concerns and to who, including external parties. How to escalate, what protections are in place for whistleblowers and the framework of responsibility and accountability.
Ethical Trading	Covers the responsibility of protecting worker rights and operating ethically and appropriately across our business and supply chain.
Human Rights Policy	Human rights is covered throughout a number of various policies. The dignity, well-being and human rights of all employees. The commitment, reporting mechanisms and responsibilities across the business.
Supplier Code of Conduct	Details the legal and regulatory compliance, human rights and ethical obligations alongside reporting, remedy and relevant contacts.
Preventing Hidden Labour Exploitation	Overarching policy for all workers in any guise to take a proactive stance in addressing hidden exploitation of workers.
Tackling Modern Slavery and Hidden Labour Exploitation	Details responsibility of roles and reporting requirements. Covers the company's commitment. Assessment, Action, response, monitoring and communications in relation to Modern Slavery.
Responsible Recruitment	Principles and practices to support ethical, fair, transparent recruitment processes. Covers reporting and responsibilities of employees across the business.
Eliminating Recruitment Costs	Clarity on no work finding fees, remediation, responsibilities and reporting requirements are covered.
Worker Engagement & Substitution	Clear guidelines on managing worker absences or substitutions with an awareness of workers sending an imposter and how to identify the signs of Modern Slavery.
Remediation	The commitment to review, revise, remedy and prevent any impact to human rights through our supply chain via various monitoring reports. Covers responsibility, escalation and procedures.
Second Tier Supply	Clarification on the supply types, adherence to authorities and risk awareness. The consideration of due diligence and processes to be followed if engaging a Second tier supply.

# Spotlight on Best Practice

We conducted our initial Modern Slavery gap analysis in 2021, this has resulted in several improvements and driven significant change in the proceeding years. During 2025 we are undertaking our latest Modern Slavery gap analysis this will form a project of work to be implemented over the course of the next three years. This will involve input from workers directly, stakeholders such as anti-slavery working groups (MSIN, WMASN), Stronger together, and ALP. Modern Slavery charities, those with lived experience and authorities' input will also be sought to ensure we factor in incentives and awareness of behaviours and trends.

Our audit program includes both announced and unannounced audits conducted by internal teams and external agencies. These audits assess compliance with our policies, identify potential risks, and verify that our practices align with our commitments to preventing Modern Slavery.

## SAMS Initiative

Brightwork has grown to become Scotland's largest recruitment agency, providing over 3,500 workers each week across a huge range of Scottish industries. Brightwork serves as the sole supplier of temporary industrial labour for the 3 largest drinks producers in Scotland, and its support extends to food production and logistics customers throughout the country, enabling us to mobilise the largest temporary workforce in Scotland.

In 2017, Brightwork founded Scotland Against Modern Slavery ('SAMS') with the focus being to raise awareness of Modern Slavery in the Scottish business community. Today, SAMS partners with governmental bodies such as the Scottish Government, Police Scotland, the Gangmasters Labour and Abuse Authority, Migrant Help, and several other NGOs, charities, and 62 corporate partners across Scotland.

The Scottish Government's Human Trafficking and Exploitation Act 2015 provides further legislative grounding in Scotland and, through SAMS, Brightwork collaborates with the Scottish Government's Human Trafficking Team to ensure that the Scottish business community is aware of this.

Working closely with Migrant Help, Refugee Sanctuary Scotland ('RSS'), and Survivors of Human Trafficking in Scotland ('SOHTIS') Brightwork has committed to help find work for rescued victims through our client and community relationships. Director, Shan Saba, serves as a Trustee for the Refugee Survival Trust charity which provides refugees and people seeking asylum with practical support when it's most needed, building connections and campaigning for change.





Many of RSS's service users remain ineligible for work in the UK whilst they navigate the Home Office asylum process. Often their workplace skills have been eroded, they are destitute and highly vulnerable to exploitation. On behalf of the Trust, SAMS runs educational workshops to prepare these people to become 'work-ready', helping them to recognise exploitation and identify what 'good work' is, and what good employers looks like.

In 2025 the SAMS movement enters its ninth year with all 62 corporate partners committed to playing their part in eradicating human trafficking and Modern Slavery by sharing good practice and intelligence across the corporate sector, assisting victims in Scotland by finding them sustainable work and helping them to thrive as they settle into new lives. Each organisation within the Corporate Partner group has an appointed ambassador whose remit is to take a lead role within their respective organisations, delivering the Scottish Government's Human Trafficking and Exploitation Team strategy, ensuring they exemplify best practice and generating awareness of Modern Slavery to their stakeholders and other businesses across Scotland.

SAMS organises and hosts monthly roundtables, boosted by regular, topical podcasts broadcast via Brightwork, assisted by guests and speakers ranging from the former Independent Anti-Slavery Commissioner, the First Minister for Scotland, and a former UK Prime Minister. The roundtable events are open to all Corporate Partners and invited guests and the aim of these, along with the supporting podcasts, is to continue to shine the light on emerging trends of perpetrators, live examples of new cases arising, government and public organisation activities, potential supply chain considerations and of course sharing best practices and business strategies.

The Scottish Government's Trafficking and Exploitation Strategy Annual Progress Report highlights Brightwork's contribution via our work in developing SAMS, helping to inform and share best practice about human trafficking and exploitation throughout the business community in Scotland, acknowledging SAMS' success in raising awareness and supporting victims has been integral to the government's future strategy.

For further information on SAMS, please visit the [SAMS website](#).



## Future Plans

Brightwork is committed to strengthening our efforts to prevent Modern Slavery and human trafficking. We recognise the complexity and sophistication of these crimes, which require ongoing vigilance and comprehensive safeguards to protect our workforce and business. Implementing robust measures to counteract exploitation is a top priority for us.

Education and awareness are key to our strategy, and we are dedicated to empowering our employees and stakeholders to identify and report any signs of exploitative practices. We continuously engage with our workforce, ensuring they feel confident and supported in raising concerns across all areas of our operations. 5 years ago, we launched our campaign to encourage workers to know their rights and understand what to expect from working in the UK. This ongoing initiative has strengthened every year, and it continues to increase awareness across our workers, fostering a culture that supports individuals to feel empowered to report any exploitative practices either experienced personally or witnessed.

At Brightwork, we also place high importance on our role in supporting local communities and protecting the environment. Our overarching strategy is outlined in our annual Environmental, Social, and Governance (ESG) report. For us, ESG is not just a compliance exercise; it is integral to our corporate and governance strategies. This includes our unwavering commitment to addressing Modern Slavery and hidden labour exploitation within our own business and throughout our partnerships. Our ESG Committee, with its deep understanding of the Group and its subsidiaries, ensures that our ESG strategy aligns with our broader business goals and remains relevant within our industry.

To learn more about our ESG strategy and commitments, read our [ESG Report on the Staffline Group Plc website](#).

We are reassured that the scale of our business can be extremely helpful to link with our partners outside of our industry to help tackle Modern Slavery and raise awareness across all regions of the UK, and we welcome all partnerships and will always do what we can to help protect workers from this abhorrent crime.

Keeping the communication channels open to encourage our workers to approach us any time to have the confidence to report exploitation and using learning platforms and internal communications to escalate messages throughout our business to keep the conversations flowing will be key to ongoing engagement.

Brightwork will continue to assess our risks and transparency throughout our business to identify and establish a company-wide compliant approach to Modern Slavery management.

# Summary

Modern Slavery and trafficking are multifaceted global problems and, with the links to many criminal organisations, it remains a high risk to any supply chain or business.

Brightwork will continue its investment in the identification and prevention of Modern Slavery; it remains a high priority for the business and that of our valued customers.

We remain fully committed to compliance and high levels of ethical standards and strive to do more to help rescue potential future victims of Modern Slavery.

Whilst we have established well tested successful processes embedded in Brightwork, we will continually review and strengthen using knowledge learnt and intelligence shared.

We are reassured that the scale of our business can be extremely helpful to link with our partners outside of our industry to help tackle Modern Slavery and raise awareness across all regions of the UK, and we welcome all partnerships and will always do what we can to help protect workers from this horrific crime.

Keeping the communication channels open to encourage our workers to approach us any time to have the confidence to report exploitation and using our internal learning platforms, our ISO 9001 certified Quality Management System, and our SharePoint tools to help escalate messages throughout our business to keep the conversations flowing will be key to engaging more internally.

Brightwork will continue to assess our risks and transparency throughout our business to identify and establish a company-wide compliant approach to Modern Slavery management.

This Modern Slavery Statement (2025-2026) was approved by the Governance Director of Staffline Recruitment Limited and the Managing Director of Brightwork in April 2025.



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