

DEEN CONSULT SERVICES LTD | GOVERNANCE & COMPLIANCE

Modern Slavery and Human Trafficking Statement

Deen Consult Services Ltd (DCS)

Voluntary transparency statement | Reporting period: 12th October 2026 to 12th October 2027

Status: Draft for factual verification and Board approval • Prepared October 2026

1. Introduction and commitment

Deen Consult Services Ltd (DCS) is committed to preventing modern slavery, forced labour, servitude and human trafficking in our operations and supply chains. We seek to treat people fairly, protect workers from exploitation and respond promptly to concerns. We recognise that recruitment and outsourced, labour-intensive services can expose workers to risks even where organisations have appropriate intentions and policies.

This statement is prepared voluntarily with reference to section 54 of the Modern Slavery Act 2015 and relevant Home Office guidance. DCS is currently understood to be below the £36 million annual turnover threshold for mandatory publication. It describes the arrangements known to DCS and identifies further measures for implementation; it must be reviewed against evidence for the stated reporting period before approval and publication.

2. Organisational structure, business and supply chains

DCS is a UK private limited company incorporated in 2021 and based in South East London. Management oversight is provided by its directors and senior management, with operational responsibility delegated to the HR, recruitment, compliance and operations functions. DCS is an SME operating through service lines that include education recruitment and staffing, health and social care staffing, supported accommodation and related support, training and employability activity, creative media and cultural services, and facilities-related services.

Our supply chain is primarily UK-based and service-led. Depending on assignments and contracts, it may include directly employed staff; temporary, agency and zero-hours workers; candidate referral sources and recruitment partners; specialist subcontractors delivering staffing, teaching, training or support services; external providers of background screening, training, payroll, IT and professional advice; property, maintenance, cleaning, transport and facilities suppliers; and suppliers used for events and media production. Subcontractors may engage further suppliers or workers, which can reduce visibility beyond the first tier.

We recognise that our role as an employment business and service provider creates responsibilities both for people whom we directly engage and for individuals working through partners and subcontractors.

3. Policies, governance and accountability

DCS has a Modern Slavery Policy setting out its zero-tolerance approach, responsibilities, escalation arrangements, training expectations and consequences for breaches. Our safeguarding, recruitment, HR, whistleblowing/grievance and supplier arrangements should be read alongside that policy where relevant. Directors have overall oversight; day-to-day implementation and escalation are managed through HR and Operations, with input from compliance and relevant service managers.

Staff and workers are encouraged to report concerns to their manager, HR or senior management without retaliation. Where an allegation suggests immediate danger or criminal exploitation, the priority is the safety of the affected person,

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including emergency services where appropriate, and referral to relevant authorities or safeguarding agencies. Information is handled sensitively and shared only as justified by safety and legal obligations.

4. Due diligence in recruitment and supplier engagement

DCS's Modern Slavery Policy requires suppliers, contractors and business partners to complete a questionnaire before a relationship begins, to support an informed decision. The policy also calls for staff induction and appropriate management/procurement training. The extent to which these controls were consistently applied during the reporting period must be verified from actual records before final publication.

Our due diligence standard is to use proportionate, risk-based checks including verification of business identity and appropriate registration; identity and right-to-work checks for workers engaged by DCS; scrutiny of recruitment fees, unusual deductions or third-party control of wages; review of worker access to their own identity documents and bank accounts; checks on working conditions and routes for raising concerns; and contractual expectations that suppliers prohibit forced, trafficked or child labour and cascade these requirements to their own supply chains.

Higher-risk subcontractors should be reviewed more closely before appointment and periodically thereafter, with concerns documented, remedial actions assigned and escalation or termination considered when necessary. These measures are policy standards and planned assurance activities, not an assertion that every check or audit has already been completed.

5. Principal risks and management response

DCS identifies risk according to sector, type of work, recruitment channel, worker vulnerability, degree of subcontracting and the level of visibility over working conditions and payment arrangements. Key areas and corresponding control priorities are set out below.

Potential exposure	Risk management priorities
Temporary/agency education and care staffing	Check identity and right to work; transparent assignment and pay terms; prohibit worker-paid recruitment fees; provide confidential reporting routes; investigate concerns around pressure, threats or wage control.
Recruitment intermediaries and subcontractors	Verify legitimacy and roles of intermediaries; use due diligence questionnaires and contractual controls; assess any onward subcontracting; prioritise higher-risk providers for periodic review.
Cleaning, maintenance, hospitality, transport and other facilities work	Consider risks from low-paid, outsourced, irregular-hours and multi-tier labour; check supplier practices, working conditions, pay arrangements and reporting mechanisms.
Supported accommodation and community-based support	Safeguard both workers and service users; train staff to recognise exploitation indicators; assess third-party contractors with access to vulnerable people; escalate safeguarding concerns.
Training, events, production and ad-hoc freelance work	Confirm contracts, agreed remuneration and worker choice; verify subcontractors where relevant; check that additional workers engaged by partners are treated lawfully.

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Indicators warranting inquiry may include confiscation of passports, debt bondage, control by another person, threats, excessive or unexplained deductions, restrictions on movement, or workers appearing unable to speak freely. A risk indicator is not proof of exploitation and should be assessed carefully, with the worker's welfare prioritised.

6. Training and awareness

DCS's policy provides for modern slavery awareness at induction and regular training for relevant management and procurement personnel. Priority content includes recognising signs of exploitation, ethical recruitment, safe handling of disclosures, supplier risks and escalation routes. Training delivery and attendance figures for this reporting period should be inserted only after confirmation from training records.

7. Measuring effectiveness and reporting progress

Our existing policy sets targets of 100% annual employee awareness training and engagement with all suppliers, contractors and business partners on modern slavery requirements. These are targets, not verified achievements. In the next reporting cycle DCS intends to maintain evidence of: staff training completion; supplier risk screening and questionnaires; relevant subcontractor assurances; concerns raised and response times; corrective actions and their closure; and management reviews. Metrics should be reported as actual numbers and percentages once validated.

8. Priorities for the next reporting period

- Create and maintain a proportionate register of active suppliers and recruitment intermediaries, recording sector, service, risk rating and follow-up owner.
- Document worker recruitment and assignment checks, including confirmation that no recruitment fees are charged to candidates and clear pay/contract information is provided.
- Use a modern slavery due diligence questionnaire and written contractual provisions for higher-risk suppliers; review subcontracting chains where relevant.
- Brief relevant staff on exploitation indicators and confidential reporting routes, and keep attendance records.
- Review any reported concerns and corrective actions at management level, with safeguards against retaliation and appropriate referrals.

9. Approval and publication

This statement relates to the reporting period stated above and is intended for annual review. It must be fact-checked, approved by the Board and signed by a company director before publication. The approved statement may be published on www.deenservices.com and supplied to clients and contracting authorities as evidence of our approach.

Approved by the Management Board on: 12/10/2026

Signed:



Director name and title: Abdul-Jelil Oladejo

Date of signature: 12/10/2026