

2 September 2026

Kate Dearden MP
Minister of State (Minister for the Future of Work)
Old Admiralty Building
London SW1A 2DY

Dear Minister,

Application of guaranteed hours proposals to temporary agency workers

We are writing as a group of trade associations and independent experts following the Government consultation on 'ending one-sided flexibility: reform of zero hour and similar contracts'.

We welcome the Government's objective of improving fairness at work and ensuring that workers are not subject to one-sided flexibility. We share that objective.

However, we have significant concerns about the application of the proposed measures to temporary agency workers. Agency work is fundamentally different from other zero-hours employment relationships. For many agency workers, flexibility is a positive and deliberate reason for choosing agency work, rather than something imposed upon them by an employer.

The Government's [own evidence](#) indicates that a significant majority of agency workers are satisfied with their working arrangements. This raises an important question about whether the proposed framework is addressing a problem that exists across the agency workforce, and whether applying the same approach to agency workers would undermine the flexibility they value.

There is also a significant timing issue. The Government's separate consultation on reforming the regulatory framework for agency work has recently concluded, but its response has yet to be published. Until the outcome of that process is known, it is difficult to assess how the proposed guaranteed-hours framework would interact with the wider regulatory regime for agency work. Further, these proposals must be considered alongside the Government's commitment to consult on a simpler employment status framework as the guaranteed-hours obligations, within

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a multi-party agency supply chain, further complicates responsibility for the worker and will be likely to lead to business model changes affecting employment status and worker protections.

In particular, we are concerned that applying these proposals to temporary agency work could have significant unintended consequences, including:

- changes to the way workers are engaged and potentially their employment status;
- substantial additional administrative burdens for businesses, agencies and other intermediaries;
- reduced opportunities for workers to access flexible assignments; and
- employers moving towards alternative models of engagement that would weaken worker protections

These reforms risk increasing costs and reducing flexibility for employers, which could deter investment, constrain business expansion and discourage hiring. The resulting drag on economic growth could lead to fewer jobs and higher unemployment, ultimately undermining the opportunities, flexibility and security the reforms are intended to provide workers.

We have set out our detailed views and evidence in our individual responses to the consultation. This letter is intended simply to highlight our shared concern that the particular application of these proposals to temporary agency workers requires further consideration, particularly while the wider agency work regulatory framework remains under review.

We would welcome the opportunity to meet with you and your officials to discuss these concerns and the practical implications for workers and businesses before the Government proceeds further with these proposals.

Yours sincerely,

Association of Labour Providers (ALP)

Association of Professional Staffing Companies (APSCo)

Freelancer and Contractor Services Association (FCSA)

Professional Passport

Recruitment and Employment Confederation (REC)

The Employment Agents Movement (TEAM)

The Employment Status Forum

The Recruitment Network (TRN)

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