BINA PATHWAYS

Preventing hidden labour exploitation

BP-PUB-11-20261106-v1 | Owner: Recruitment lead under the directors | Review by 6 November 2027 or earlier on material change

Risk

Hidden exploitation may involve third parties or individuals abusing workers without the company's knowledge. We assess risks during recruitment and deployment, including work-finding charges, forced accommodation or transport, control of documents and coercive financial arrangements.

Recruitment controls

Speak directly and privately to the applicant where possible, use accessible explanations, verify identity and references independently and confirm that the applicant controls their contact and wage arrangements. An interpreter or helper is not automatically suspicious, but conflicts and unexplained third-party control require sensitive follow-up.

Money and suppliers

Do not use an intermediary that charges applicants to find work. Verify changes to bank details through an established independent contact route. Investigate unexplained shared payment accounts and deductions proportionately without unfairly excluding legitimate arrangements. Record actual costs and legal checks for permitted charges.

Protection and reporting

Concerns go to admin@binapathways.co.uk or 07337 541218 or appropriate police or safeguarding authorities, with 999 for immediate danger. Workers can raise concerns anonymously and are not penalised for seeking help. Do not alert a suspected exploiter in a way that increases risk. Obtain suitable safeguarding advice and preserve evidence.

Management action

An uninvolved manager coordinates safety, pay access, employment support and referral. Record the response, worker's wishes where relevant, outcomes and follow-up. Recruitment staff receive awareness training; suppliers must meet equivalent standards. Review effectiveness through quarterly recruitment samples and annual risk review.

Related controlled procedures: Modern slavery policy; Whistleblowing policy. Use Operational Action Guide BP-ACT-2026-11-06-v1 for the responsible person, action, deadline, escalation and record. Accessible copies: admin@binapathways.co.uk or 07337 541218.