BINA PATHWAYS

Modern slavery and human trafficking

BP-PUB-10-20261106-v1 | Owner: Directors | Review by 6 November 2027 or earlier on material change

Commitment and scope

We oppose forced labour, trafficking, servitude and exploitation throughout recruitment, employment, assignments and purchasing. This policy applies to managers, staff and suppliers. It is a company policy, not a claim that a statutory annual statement is required or has been filed.

Prevention

Workers keep control of their identity documents, wages and decision to accept work. No work-finding fee, coercion, hidden deduction or unlawful restriction on leaving is permitted. Legitimate employment and right-to-work checks are explained and handled securely. Examine labour-provider chains and the treatment of vulnerable applicants.

Warning signs

Concerns include a third party controlling communication or pay, shared bank details without explanation, withheld documents, threats linked to immigration or income, debt bondage, unsafe compulsory accommodation, unexplained transport charges and fear of speaking privately. Assess signs without stereotyping or treating them alone as proof.

Reporting and response

For immediate danger call 999. Otherwise report through admin@binapathways.co.uk or 07337 541218 or an appropriate external police or safeguarding route. Do not confront suspected exploiters or undertake an unsafe investigation. Protect the person, obtain specialist advice, preserve facts and restrict information. The uninvolved director records referrals and safe employment arrangements.

Supplier review and learning

Record supplier checks, fees, subcontracting, issues and corrective actions; stop unsafe arrangements. Provide recruitment staff training and confidential reporting options. Directors review risks and cases at least annually and assess whether the legal turnover and group threshold requires a separate statutory statement.

Related controlled procedures: Hidden labour exploitation policy; Governance manual section 14. 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.