



Pathway Group

Modern Slavery Policy

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V1.1	Original	Shaheed Ladak	Safaraz Ali	Creation	20.11.2020
V1.2	Review	Sajad Ali	Ahsan Husain	No Change	21.11.2022
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Next Review Date:

08/12/2026



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Intent

Pathway Group is fully committed to preventing modern slavery, human trafficking, forced labour, and exploitation in all aspects of our operations. We recognise that modern slavery is a serious crime and a fundamental violation of human rights. As an organisation responsible for education, employment support, and community services, we have a duty to act ethically, transparently, and with integrity at all times.

Our intent is to:

Ensure that modern slavery has no place within our organisation or any part of our supply chain.

Embed robust processes that identify, prevent, and address any risk of exploitation.

Promote a culture where staff, learners, partners, and suppliers understand their responsibilities in safeguarding individuals from harm.

Meet and exceed the legal duties set out under the Modern Slavery Act 2015 and all related UK legislation. Ensure that everyone connected to Pathway Group is treated with dignity, respect, and fairness.

Pathway Group adopts a zero-tolerance approach to modern slavery. We are committed to working proactively with employees, learners, and supply chain partners to uphold the highest ethical standards. Through clear governance, appropriate training, and strong due-diligence practices, we seek to protect vulnerable individuals, prevent exploitation, and maintain a safe and transparent environment for all.

This policy reinforces our wider organisational values and our commitment to safeguarding, ethical conduct, and responsible business practices.

Safaraz Ali
Chief Executive Officer





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Implementation

Legal Framework and Compliance

Pathway Group recognises its responsibilities under the Modern Slavery Act 2015 and related safeguarding and employment legislation. We are committed to ensuring that modern slavery, human trafficking, forced labour, or exploitation do not occur within our organisation or supply chains.

This policy applies to all individuals working for Pathway Group or on our behalf, including:

Employees at all levels

Agency workers and contractors

Consultants and third-party representatives

Volunteers, trainees, and learners

All individuals are expected to act ethically and in full compliance with this policy.

Definitions

Modern slavery encompasses a range of exploitative practices, including:

Slavery and servitude

Forced or compulsory labour

Human trafficking

Debt bondage

Child labour

Coercion, threats, or deception for exploitation

Modern slavery may affect adults or children and can occur in any sector, business relationship, or supply chain.

Due Diligence and Risk Management

Pathway Group will implement proportionate and effective due diligence procedures to identify, prevent, and mitigate risks of modern slavery.

This includes:

1. Supplier and Partner Checks

Before engaging a new supplier, contractor, or partner, Pathway Group will:

Conduct background, financial, and identity checks.

Assess ethical standards and labour practices.

Confirm compliance with the Modern Slavery Act 2015.

Require acceptance of our ethical code of conduct.

High-risk suppliers may undergo enhanced checks.

2. Ongoing Supply Chain Monitoring

We will:

Periodically review suppliers and partners.

Conduct audits where concerns are identified.

Request written statements confirming compliance.

Include modern slavery clauses in relevant contracts.



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3. Internal Assessment

Modern slavery is included in our organisational Risk Register. The risk level is reviewed by the Senior Executive Team. Any identified concerns trigger immediate review and mitigation.

Training, Awareness and Culture

Pathway Group is committed to ensuring all staff understand the nature and risks of modern slavery.

We will:

Provide mandatory training for new starters during induction.

Refresh training annually or more frequently when required.

Ensure relevant staff (e.g., procurement, compliance, quality) receive enhanced training.

Promote a culture where concerns can be raised safely and without fear of retaliation.

Managers must ensure their teams remain vigilant and confident in identifying and reporting potential risks.

Reporting Concerns

Pathway Group encourages staff, learners, and partners to report any concerns relating to modern slavery, exploitation, or unethical conduct.

Concerns may be reported through:

The Whistleblowing Policy

The Safeguarding Team

A line manager or senior manager

The HR Department

Reports will be handled:

Promptly

Confidentially

Without victimisation or detriment

Where modern slavery is suspected, Pathway Group will take immediate action, including notifying the appropriate statutory authorities (e.g., Police, Local Authority, or the Modern Slavery Helpline).

Performance Monitoring and

To assess the effectiveness of our approach, Pathway Group reviews:

Staff training completion levels

Reported concerns or incidents

Supplier compliance rates

Findings from audits or due-diligence reviews

Working With Suppliers



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All suppliers must:

Demonstrate compliance with the Modern Slavery Act 2015

Ensure fair labour practices

Confirm no forced or trafficked labour is used

Co-operate with due diligence checks and audits

Provide documentation when requested

Failure to comply may result in suspension or termination of the relationship.

Breaches and Non-Compliance

Pathway Group takes modern slavery extremely seriously. We reserve the right to terminate relationships with any individual, supplier, or organisation found to be:

Breaching this policy

Failing to implement adequate safeguarding measures

Involved in modern slavery, trafficking, or exploitation

Employees who breach this policy will face disciplinary action, up to and including dismissal.

Policy Review

This policy will be:

Reviewed annually

Updated in line with legislative changes or operational needs

Approved by the CEO

All updates will be communicated to employees and relevant partners.