



Mind Bearer Ltd.

Modern Slavery and Human Trafficking Statement

Section 54, Modern Slavery Act 2015

Last Update: Monday, 20 July 2026

Scope: Mind Bearer Ltd.

Issued by: Practice Manager

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1. Document Control

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Name	Date	Version	Approved By	Comments
Modern Slavery	29 April 2026	V1.0	Richard Nettleship	Initial Version



2. Introduction

Mind Bearer is committed to conducting all aspects of its business ethically, responsibly and with integrity. We recognise that modern slavery, human trafficking, forced labour, debt bondage and exploitation are serious criminal offences and violations of fundamental human rights.

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and sets out the steps Mind Bearer Ltd. has taken, and continues to take, to minimise the risk of modern slavery and human trafficking within our organisation and supply chains.

Although our organisation operates within a sector generally considered to present a relatively low risk of modern slavery, we acknowledge that no organisation is immune from these risks and we remain committed to maintaining robust preventative measures.

3. Our Organisation

Mind Bearer provides professional mental health and wellbeing services, including:

- Counselling and psychotherapy
- Mental health outreach and wellbeing services
- Training and professional development
- Appropriate Adult services
- Community support programmes
- Consultancy and partnership working

Our operations are based within the United Kingdom and are delivered through employees, associates, volunteers and approved partner organisations.

4. Our Commitment

Mind Bearer is committed to:

- Operating lawfully and ethically
- Respecting internationally recognised human rights
- Maintaining a workplace free from exploitation
- Preventing modern slavery in all business activities
- Promoting transparency throughout our supply chains
- Encouraging all staff and volunteers to report concerns without fear of retaliation

We operate a zero-tolerance approach towards all forms of slavery, servitude, forced labour and human trafficking.



5. Our Supply Chains

Our supply chain is relatively straightforward and primarily includes:

- Office and IT equipment suppliers
- Professional training providers
- Recruitment agencies
- Payroll and HR services
- Software providers
- Counselling resources and publications
- Facilities and office services
- Professional consultants
- Volunteer recruitment services

Where possible we seek to work with reputable UK suppliers who demonstrate compliance with UK employment legislation and ethical business practices.

6. Risk Assessment

Mind Bearer undertakes proportionate assessments of potential risks within its operations and supply chains.

Potential areas of risk include:

- Recruitment of temporary workers
- Outsourced support services
- Cleaning and facilities management
- Technology and hardware manufacturing supply chains
- Overseas manufacturing of equipment

Overall, the level of risk within our direct operations is considered low; however, we recognise indirect risks may exist further down global supply chains.

7. Due Diligence

To minimise risks, Mind Bearer undertakes appropriate due diligence before engaging suppliers and partners.

This includes, where appropriate:

- Verifying supplier legitimacy
- Checking business registrations
- Confirming compliance with UK employment legislation
- Reviewing safeguarding arrangements where applicable



- Requesting Modern Slavery Statements from larger suppliers where legally required
- Assessing suppliers' ethical practices during procurement
- Including ethical expectations within contracts where appropriate

Suppliers identified as presenting elevated risks may be subject to enhanced due diligence.

8. Recruitment Practices

Mind Bearer maintains fair and transparent recruitment practices designed to prevent exploitation.

Our recruitment procedures include:

- Verification of identity
- Right to work checks
- DBS checks where appropriate
- Qualification verification
- Employment references
- Written contracts of employment
- Compliance with National Minimum Wage legislation
- Fair working hours
- Freedom to terminate employment in accordance with contractual arrangements

We do not retain employees' passports or identity documents except where temporary copies are required for legal verification.

No recruitment fees are charged to employees or volunteers.

9. Policies Supporting this Statement

This statement is supported by our wider governance framework, including:

- Safeguarding Policy
- Whistleblowing Policy
- Equality, Diversity and Inclusion Policy
- Recruitment and Selection Policy
- Code of Conduct
- Complaints Policy
- Information Security Policy
- Health and Safety Policy
- Volunteer Policy



- Procurement Procedures

These policies promote ethical working practices and provide mechanisms for raising concerns.

10. Reporting Concerns

All employees, associates, volunteers and contractors are encouraged to report any concerns relating to suspected modern slavery.

Reports may be made:

- To a Line Manager
- To the Director
- Through the Whistleblowing Procedure
- Directly to relevant statutory authorities where appropriate

All reports are treated confidentially and investigated promptly.

No individual will suffer detriment for raising genuine concerns in good faith.

11. Training and Awareness

Mind Bearer is committed to ensuring relevant personnel understand the risks associated with modern slavery.

Training may include:

- Recognising indicators of exploitation
- Understanding safeguarding responsibilities
- Reporting concerns
- Ethical procurement
- Safe recruitment
- Human rights awareness

Managers responsible for procurement and recruitment receive additional guidance where appropriate.

12. Effectiveness

We monitor the effectiveness of our approach through:

- Annual policy reviews
- Supplier due diligence
- Recruitment compliance audits



- Safeguarding monitoring
- Incident reporting
- Whistleblowing reports
- Internal management reviews

Where improvements are identified, action plans are implemented and monitored.

13. Future Commitments

During the next reporting period Mind Bearer will continue to:

- Review supplier assurance arrangements
- Strengthen procurement documentation
- Increase staff awareness training
- Monitor emerging risks
- Review this statement annually
- Promote ethical employment throughout all contracted services

14. Approval

This statement has been approved by Mind Bearer Ltd. and will be reviewed annually.

Signed

Richard Nettleship

CEO

Mind Bearer Ltd.

Date: Wednesday, July 22, 2026