




# The Mantra Group Modern Slavery Policy

Policy Owner	Quality Team
Policy Status	LIVE
Policy Version	Version 2
Approved by	D Hewitt
Approval Date	2 <sup>nd</sup> Jan-26
Review Date	2 <sup>nd</sup> Jan-27
Distribution	All Staff
Signed Mark Currie, Chief Executive	

## **A) INTRODUCTION/PURPOSE**

Modern slavery is a term used to encompass slavery, servitude, forced and compulsory labour, bonded and child labour and human trafficking.

Human trafficking is where a person arranges or facilitates the travel of another person with a view to that person being exploited. Modern slavery is a crime and a violation of fundamental human rights.

Mantra Learning is fully committed to promoting the rights of children, young people, and vulnerable adults, notably their rights in relation to modern slavery and human trafficking. Mantra Learning aims to ensure that all children, young people and vulnerable adults are protected and kept safe from harm while they are actively engaged in learning, and that they are supported in their understanding of how to keep themselves safe outside of the learning environment as is described within the Safeguarding Policy. Mantra Learning is committed to maintaining procedures and practices, and implementing systems and controls, aimed at ensuring that modern slavery is not taking place anywhere within our organisation and does not affect any of our learners. We expect that our subcontractors and suppliers will hold their own suppliers to the same high standards.

Throughout the policy and procedures, reference is made to 'children and young people'. This term is used to mean everyone under the age of 18.

Reference is also made to 'vulnerable adults'. A vulnerable adult, in this context, is a person aged 18 years or over who is, *or may be*, in need of community care services by reason of mental health or other disability, age or illness and who is, *or may be*, unable to take care of themselves or protect themselves against significant harm or exploitation.

## **B) POLICY STATEMENT**

In order to achieve the objectives described above, Mantra Learning commits to the statements below.

- We have a zero-tolerance approach to modern slavery in our organisation and our supply chains.
- The prevention, detection and reporting of modern slavery in any part of our organisation or supply chain is the responsibility of all those working for us or on our behalf. Workers must not engage in, facilitate, or fail to report any activity that might lead to, or suggest, a breach of this policy.

- We are committed to engaging with our stakeholders and suppliers to address the risk of modern slavery in our operations and supply chain. This includes educating our staff, the staff of our subcontractors, and our learners, about modern slavery.
- We take a risk-based approach to our contracting processes and keep them under review. We assess whether the circumstances warrant the inclusion of specific prohibitions against the use of modern slavery and trafficked labour in our contracts with third parties.
- We require our subcontractors and learners to comply with our Code of Conduct and Behaviour Policy respectively, and our Safeguarding Policy which dictates the reporting of any and all concerns about another individual.
- Consistent with our risk-based approach we may require:
  - employment and recruitment agencies and other third parties
  - supplying workers to our organisation to confirm their compliance with our Code of Conduct
  - suppliers engaging workers through a third party to obtain that third parties' agreement to adhere to the Code
- As part of our ongoing risk assessment and due diligence processes, we will consider whether circumstances warrant us carrying out audits of suppliers for their compliance with our Code of Conduct.
- If we find that other individuals or organisations working on our behalf have breached this policy, we will ensure that we take appropriate action.

### **C) CONTRAVENTION OF POLICY**

Failure to comply with any of the requirements of this policy is a disciplinary offence and may result in disciplinary action being taken under the Mantra Learning disciplinary procedure.