



## **Modern Slavery and Human Trafficking Statement**

**Leading Futures Education Services**

**Financial Year: 2025 / 2026**

Leading Futures Education Services is committed to preventing modern slavery and human trafficking in all forms within our organisation and across our supply chains. This statement is published in accordance with the UK Modern Slavery Act 2015 and outlines the steps we take to uphold human rights and ensure ethical business practices.

### **a. Organisation Structure, Business and Supply Chains**

Leading Futures Education Services operates as an independent UK-based education services provider of assessment and alternative provision, delivering innovation-led programmes including employability learning, academic and holistic support, educational consultancy, and partner learning solutions.

Our organisational structure consists of:

- **Directors:** responsible for compliance and strategic direction
- **Director of Service** - quality assurance, safeguarding and procurement
- **Director of SEND** – transition, teaching and learning, SENDCo responsibilities
- **Tutors** - managing education programmes, learners progress
- **Pastoral Support** – learner engagement and intervention
- **Business Support Functions** - including HR and finance

Our supply chains support the delivery of education services and include:

- **Professional Services** - IT support

As a provider operating primarily in the UK education sector, our supply chains largely consist of regulated and professional service providers. We recognise that subcontracted and international procurement would heighten risks.

More information about our organisation is available at our official website: [www.leadingfutures.uk](http://www.leadingfutures.uk)

## **b. Policies on Slavery and Human Trafficking**

Our approach to anti-slavery is embedded within several internal and public-facing policies, including but not limited to:

- **Safeguarding and Child Protection Policy**
- **Whistleblowing Policy**
- **Staff Code Conduct Policy**
- **Equality, Diversity and Inclusion Policy**

Key policy commitments include:

- Zero tolerance towards all forms of modern slavery or trafficking
- Protection of individuals through strong safeguarding reporting lines
- Ethical supplier expectations and contractual compliance requirements
- The right for staff and stakeholders to raise concerns safely without retaliation
- Immediate termination of supplier relationships when violations are substantiated

All policies are reviewed regularly (annually if required) and endorsed by the Directors.

## **c. Due Diligence and Anti-Slavery Processes**

We carry out due diligence through the following measures:

- **Supplier verification and onboarding checks**, including authorisation status, DBS requirements where applicable, financial compliance, and regulatory standing
- **Contract clauses** requiring suppliers and associates to confirm compliance with the Modern Slavery Act 2015
- **Risk-based assessment of procurement**, including geographical and sector risk mapping
- **Ethical sourcing reviews**, particularly for technology providers, publishing services and facilities suppliers
- **Clear reporting pathways**, enabling learners, staff, tutors and stakeholders to raise concerns
- **Cross-functional oversight** from HR, procurement and safeguarding leads to investigate risks

We also assess subcontractors, associates, and strategic partners using a tiered modern slavery risk tool aligned to education sector guidance.

## **d. Risk Areas and Steps Taken to Assess and Manage Risk**

Although Leading Futures Education Services operates in a sector considered lower risk than manufacturing or industrial labour markets, we recognise that modern slavery risk can still exist, particularly within third-party supply and service environments.

We identify potential risks in:

Business / Supply Area	Modern Slavery Risk Type	Mitigation Steps
Facilities and office suppliers	Subcontracted cleaning, security or maintenance personnel	Supplier assurance statements, audits, contractual compliance, reporting lines
Digital platforms and IT services	Use of offshore development or unverified subcontractors	Platform due diligence, data protection compliance, director-level supplier verification
Awarding bodies and delivery associates	Employment status exploitation or unregulated subcontracting	Associate vetting, qualification checks, formal contracting, safeguarding requirements
Education resource procurement	Goods manufactured internationally	Responsible sourcing preference, supplier declarations, risk screening by region

Steps we take to manage these risks include:

- Structured risk scoring during procurement
- Supplier statements confirming prevention controls
- Periodic spot-check audits and compliance sampling
- Raising non-compliance findings to executive leadership
- Maintaining a preferred supplier list with ethical compliance requirements

Where any potential red flags are identified, we launch enhanced assurance reviews before procurement continues.

#### e. Measuring Effectiveness and Performance Indicators

We monitor organisational effectiveness using key performance indicators (KPIs), including:

- **0 substantiated incidents of modern slavery within the organisation** in the reporting period
- **Safeguarding reporting audit outcomes**, no evidence
- **Time-to-investigate** raised concerns relating to exploitation indicators

Our performance remains under continuous review. We commit to strengthening KPIs as our partnerships expand, including supplier audit targets and reporting transparency metrics.

## **f. Training and Capacity Building for Staff**

We provide ongoing training to ensure all personnel understand modern slavery risks, indicators and reporting responsibilities:

Mandatory and available training includes:

- **Annual Modern Slavery Awareness Training**
- **Safeguarding and Prevent (including exploitation vulnerability modules)**
- **Whistleblowing and ethical compliance briefings**
- **DBS and role-appropriate safety compliance training**
- **Learner-facing staff training** on spotting vulnerability or coercion indicators

Training is delivered through:

- ✓ internal compliance modules
- ✓ live staff workshops
- ✓ external expert safeguarding partners
- ✓ mandatory induction modules for new staff and associates

Completion is logged centrally and monitored by Directors.

## **Approval**

This statement has been approved by the Director of Service, of Leading Futures Education Services.

**Signed:**



**Name:** Emma Rennie-Gibbons

**Date:** 27 November 2025