Modern Slavery and Human Trafficking Policy

POLICY APPROVAL

Approval Required	Indicate with a tick (✓)		**Annual Review Required**	Indicate with a tick (✓)	
	Yes ✓	No		Yes ✓	No
Approval Panel	Loren Janes				
Approved by	Name: Loren Janes		Signature:	Date: November 2025	
Policy Review Date	November 2026				

Policy Statement

We are proud of the conditions of employment for all our employees and contractors throughout Future Changing. Given the nature of our business, our senior management team considers there exists minimal risk either within Future Changing directly or through our approved supply chain in support of our business activities. We are assured through a robust compliance process that all internal and external parties involved within the Future Changing's working regime are in no way tangibly supportive of nor complicit in slavery and human trafficking.

The employment and procurement practices operated by the businesses within Future Changing ensure that we rightly viewed as an excellent and supportive employer, to the extent that our organisation operates as a purchaser of goods or services we expect a high level of ethical conduct form those businesses which we do business within our supply chain.

Future Changing has zero tolerance to slavery and human trafficking and is committed to ensuring that there is no modern slavery or human trafficking in any part of our business.
This Anti-Slavery Policy Statement is the principal articulation of the Future Changing stance on slavery and human trafficking. It is intended to inform and influence all the operational procedures within the organisation.

Our Anti-Slavery Statement reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure that slavery and human trafficking is not taking place anywhere tin out business or related supply chains.

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and sets out the steps that the company has taken and is continuing to take to ensure that modern slavery of human trafficking is not taking place within our business or supply chain.

Modern Slavery encompasses slavery, servitude, human trafficking and forced labour. The company has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

Futures Changing recognises that modern slavery and human trafficking are forms of exploitation and are therefore safeguarding concerns under Keeping Children Safe in Education 2025 (KCSIE). As an organisation working with and supporting children and young people, we ensure that our approach to modern slavery aligns with statutory safeguarding responsibilities.

Due Diligence and Implementation Processes

As part of our initiative to identify and mitigate risk (including in relation to that of (human trafficking and slavery) we operate a range of policies and procedures appropriate to our sector. These include the following areas:

- Modern Slavery and Human Trafficking Policy
- Anti-Bribery and Corruption Policy
- Child Protection and Safeguarding Policy
- Whistle Blowing Policy
- Prevent and Radicalisation Policy
- Equity, Diversity and Inclusion Policy
- Health and Safety Policy
- Safer Recruitment Policy

Our Policies

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

- Anti-Slavery Policy. This policy sets out the organisation's stance on modern slavery and explains how employees can identify any instances of this and where they can go for help.
- Safer Recruitment Procedure. We operate a robust recruitment process, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.
- Whistleblowing Policy. We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.

Our Suppliers

The company operates a Procurement Procedure and maintains an Approved Supplier List.
We conduct due diligence on all suppliers before allowing them to become an approved supplier. We require that they confirm to us that:

- They have taken steps to eradicate modern slavery within their business
- They hold their own suppliers to account over modern slavery

Training

We regularly brief all relevant management and staff members, and ensure that our policies reach every employee, in order that they understand the signs of modern slavery and what to do if they suspect that there is any risk of it taking place within any area of our business or our supply chain.

We will communicate this statement to all staff to ensure a high level of understanding of the risks of modern slavery and human trafficking.

Our Performance Indicators

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if:

- No reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.
- We achieve a level of communication and personal contact with every employee and their understanding of, and compliance with, our expectations regarding modern slavery.

Child Trafficking and Exploitation

In accordance with KCSIE, we recognise that children may be trafficked for the purposes of:

- Forced labour
- Criminal exploitation (including CCE and County Lines)
- Sexual exploitation (CSE)
- Domestic servitude
- Forced marriage or illegal adoption

Child trafficking is treated as an immediate safeguarding concern, reported through our Child Protection procedures.

Staff Training – KCSIE Requirements

All staff receive training that includes:

- Indicators of child trafficking and exploitation
- Signs of County Lines involvement
- Grooming processes and online coercion
- How to respond to and report concerns
- Referral requirements to the Designated Safeguarding Lead (DSL)
- External reporting mechanisms such as the National Referral Mechanism (NRM)

Training is refreshed annually and aligned to the latest KCSIE guidance.

Safer Recruitment (KCSIE Part 3)

Our recruitment processes comply with KCSIE Part 3 and include:

- Enhanced DBS checks with barred list checks where appropriate
- Prohibition checks
- Identity, reference, and employment history verification
- Right to work checks
- Risk assessment of any information returned on DBS certificates
- Ongoing vigilance through supervision and probationary reviews

These measures reduce the risk of individuals using employment to access or exploit children.

Reporting and Escalation

Where modern slavery or trafficking involving a child is suspected:

- Concerns are immediately referred to the DSL
- The DSL follows local safeguarding partnership procedures
- Referrals are made to children's social care and/or the police
- Use of the National Referral Mechanism (NRM) is considered where appropriate
- Records are made in line with statutory safeguarding expectations

Multi-Agency Working

Futures Changing works closely with:

- Essex County Council (ECC)
- Local Safeguarding Children Partnerships
- Police and MACE (Missing and Child Exploitation) teams
- Health and education professionals

We understand that effective prevention of trafficking and exploitation depends on strong partnership working in line with statutory safeguarding frameworks.