

## **REAch2 Academy Trust**

# **Modern Slavery Statement**

REAch2 is an Academy Trust in Burton Upon Trent comprising 60 schools, 3,700 employees, and circa 20,000 pupils. The Trust has an annual turnover in excess of £120 million. We are passionate about tackling the growing problem of modern slavery and are looking to increase transparency in our operations.

Our Trust strongly values:

- The ethical treatment of all individuals.
- The safeguarding of children, young people, and vulnerable adults.
- The responsible, accountable, and compliant spending of public and charitable funds.

#### Introduction

Slavery and human trafficking are criminal offences and abhorrent practices to which REach2 takes a zero-tolerance approach. REach2 is committed to helping tackle this problem and ensuring that slavery and human trafficking does not take place within our operations or supply chains. To this end we will ensure all trustees, relevant staff and representatives are suitably briefed or trained and made aware of our policy.

## **Purpose**

The aims of the policy are:

- a) To ensure that business operations are completely free from modern slavery and human trafficking.
- b) To ensure that REACH2's position on preventing slavery and human trafficking is reflected throughout our operations and decisions
- c) To ensure those who do work for REACH2, whether staff, suppliers or volunteers, act in a way that helps prevent slavery and human trafficking
- d) To demonstrate due diligence and help reduce the risk of slavery and human trafficking in our activities
- e) To provide assurances to those REACH2 does business with that we have an effective system in place
- f) To manage our risks and ensure our activities reflect our values, meet our stakeholders' expectations, and protect our reputation

### Scope

The aims of this policy are applicable to the Trusts' operations and supply chain; to our Memorandums of Understanding and agreements; and to all those with whom we have a working or commercial relationship.

Our supply chain includes:

- Audit
- Catering
- Corporate costs

- Marketing and advertising
- Music services
- Printing postage and stationery
- Recruitment



- Educational consultancy
- Educational Supplies
- Educational visits
- Estates and facilities management
- Hire of equipment
- Insurance
- Licenses and subscriptions

- School Uniform
- Staff development
- Staff expenses
- Support staff costs
- Technology costs
- Telephony
- Utilities

## Roles and responsibilities

The Chief Executive will hold the Executive and Senior Leaderships Teams within individual school responsible for taking steps to ensure this policy is promoted, understood and implemented by all employees and any individuals who may represent the organisation or deliver our products and services.

All employees, representatives and those delivering our products and services are responsible for taking steps to promote the principles of this policy to help prevent slavery and human trafficking. Similarly, all individuals are expected to challenge and report any breaches of the policy.

### **REach2** commitment to action

The Trust seeks the highest standards of compliance, ethics, and integrity in all areas of the organisation and is committed to ensuring due diligence is always conducted with regard to ensuring modern slavery holds no place in its operations.

## Recruitment

The Trust conducts all its recruitment processes in line with its Child Protection and Safeguarding Policy, which lays out stringent processes for recruiting staff, and thoroughly checking that they are legally entitled to work in the UK.

#### Policies and procedures

The Trust has implemented a Child Protection and Safeguarding Policy which references modern slavery and maintains due regard for the Modern Slavery Act 2015 in all policies, procedures and regulations relating to its financial management and procurement. Our policies are regularly monitored, are officially reviewed, and are updated in response to any changes to government regulations or guidelines.

## Risk assessment and due diligence

The Trust has identified specific supply chains and recruitment channels in which there is a heightened risk of modern slavery, assessed potential risk areas within these and implemented mitigating actions against these risks. These risk assessments are under continual review.

Risk factors for consideration include:

Country risks – exposure may be greater in global supply chains in countries where protection against breaches of human rights is limited, particularly with regard to rights of foreign contract



workers to retain their own ID and papers, and/or where work arrangement by agents is common, etc.

Sector risks – there are different risks and levels of risk in different sectors. For example, the risks and arrangements which generate bonded labour situations for workers in the extractives sector may differ to those causes in manufacturing.

Transaction risks – banks or financial institutions may be involved in facilitating financing from or supporting cases of modern slavery and bonded labour in operations or supply chains or through money laundering.

Business partnership risks – different supplier relationships and business partnerships will all carry different levels of risks. In some cases, existing long-term partnerships will involve less risk because the organisation will have a better knowledge of their partner's operations and policies. However, a new partnership or business relationship may be equally low risk as long as proper due diligence is conducted.

## **Procurement and Supply Chain Management**

In order ensure high standards are continually met, we <del>also</del>-maintain the following due diligence practices on new suppliers:

- Obtaining evidence that suppliers pay their staff at least the correct minimum wage.
- Obtaining a copy of suppliers' anti-slavery policies or statements.
- Ensuring suppliers can provide relevant health and safety checks.

We expect all suppliers working with the Trust to ensure they are compliant with the Modern Slavery Act 2015 in their operations, and we routinely seek assurances from them to this effect, ensuring any weak areas are investigated and appropriate actions taken.

### **Training**

All staff members, local governors and trustees receive training on modern slavery and the related policies.

Trustees and staff responsible for financial management, recruitment and procurement have this training refreshed annually, while other staff and trustees receive refresher training every two years.

## Goals and key performance indicators

The Trust is committed to continually reviewing and improving its practices to ensure modern slavery is in no way a part of its operations. Over the next financial year, we are looking to implement the following control measures to increase our oversight of ethical procurement and recruitment:

- Developing strategic vision for Social Justice and Sustainability
- Delivering statutory training
- Best practice HR in recruitment
- Best practice procurement
- Optimizing the use of Public Sector Buying Organisations
- Improving supplier performance management



#### **Academies**

This statement applies to all academies within the Trust, including:

- Aerodrome Primary Academy
- Beccles Primary Academy
- Brampton Primary Academy
- Burrsville Infant Academy
- Bushbury Lane Academy
- Camulos Academy
- Chapel End Junior Academy
- Chigwell Primary Academy
- Civitas Academy
- Concordia Academy
- Copperfield Academy
- Dorothy Barley Junior Academy
- Eastbrook Primary Academy
- Five Spires Academy
- Garden City Academy
- Green Park Village Primary Academy
- Green Ridge Primary Academy
- Gunton Primary Academy
- Heath Hayes Primary Academy
- Henhurst Ridge Primary Academy
- Kemsley Primary Academy
- Kirby Primary Academy
- Langtons Junior Academy
- Lawley Village Academy
- Lower Farm Academy
- Manor Park Primary Academy
- Martlesham Primary Academy
- Milton Court Primary Academy
- Moor Green Primary Academy
- Newhall Primary Academy

- Northfield St Nicholas Primary Academy
- Norton Canes Primary Academy
- Oakfield Primary Academy
- Pemberley Academy
- Phoenix St Peter Academy
- Purfleet Primary Academy
- Racemeadow Primary Academy
- Ranikhet Academy
- Riverside Academy
- Robert Fitzroy Academy
- Scientia Academy
- Silkmore Primary Academy
- Sir Martin Frobisher Academy
- Springfield Primary Academy
- Springhill Primary Academy
- Sprites Primary Academy
- St Margaret's Primary Academy
- St Mark's Church of England Primary Academy
- Summerside Primary Academy
- The Globe Primary Academy
- The Limes Primary Academy
- The Palmer Primary Academy
- The Woodside Primary Academy
- Tidemill Academy
- Tymberwood Academy
- Unity Primary Academy
- Veritas Primary Academy
- Water Lane Primary Academy
- White Meadows Primary Academy
- Wilshere-Dacre Junior Academy

## **Declaration**

This statement has been approved in full by the REAch2 Academy Trust board of trustees, pursuant to the fulfilment of its obligations under section 54(1) of the Modern Slavery Act 2015.