



REAch2 Academy Trust

Modern Slavery and Human Trafficking Statement

2025/26



1. Introduction

- 1.1. This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and sets out the steps REAch2 Academy Trust has taken, and continues to take, to ensure that modern slavery and human trafficking do not occur within our organisation or supply chains.
- 1.2. REAch2 Academy Trust is the largest primary-only academy trust in England, supporting over 60 primary academies and approximately 21,000 pupils. We employ around 3,700 staff and have an annual turnover in excess of £150 million. Our mission is to provide exceptional education for every child, underpinned by our Touchstone values of integrity, responsibility, inclusion, and leadership.
- 1.3. Modern slavery is a crime and a violation of fundamental human rights. It includes slavery, servitude, forced or compulsory labour, and human trafficking. REAch2 has a zero-tolerance approach to these practices and is committed to acting ethically and with integrity in all our operations and relationships.

2. Our Structure and Supply Chains

- 2.1. REAch2 operates across England in the education sector. Our supply chains include, but are not limited to:
 - Catering and cleaning services
 - Estates and facilities management
 - Educational resources and consultancy
 - Recruitment and agency staffing
 - Technology and telephony
 - School uniforms
 - Educational visits
- 2.2. We recognise that some of these areas, particularly outsourced services and international supply chains, may present higher risks of modern slavery.

3. Policies and Governance

- 3.1. Our commitment to preventing modern slavery is embedded in our governance and policies:
 - Procurement Policy – requires ethical sourcing and supplier compliance.
 - Safer Recruitment Policy – ensures all staff have the legal right to work in the UK.
 - Whistleblowing Policy – provides a safe mechanism for reporting concerns.
 - Safeguarding and Child Protection Policy – reinforces our duty to protect vulnerable individuals.
- 3.2. The Chief Executive Officer and Executive Leadership Team are responsible for ensuring these policies are implemented across the Trust. Oversight is provided by the Trust Board and the Risk & Audit Committee.



4. Due Diligence and Risk Management

- 4.1. REACH2 Academy Trust recognises that modern slavery risks vary across sectors, geographies, and the complexity of supply chains. The Trust has a structured risk assessment framework to identify and prioritise areas of concern.
- 4.2. Areas that contribute the modern slavery risks include:
- Sector risk – certain sectors are inherently more vulnerable to exploitation due to the nature of work and labour practices. For example, outsourced services such as catering, cleaning, and construction often involve low-paid, temporary, or seasonal labour, which can increase the risk of forced labour or unethical recruitment practices.
 - Geographic risk – certain products and services are sourced from regions where labour protections may be weaker and the prevalence of forced labour is higher. For example, uniforms and IT hardware are often manufactured overseas, sometimes in countries with limited enforcement of employment standards. These supply chains can involve multiple tiers of subcontracting, making it harder to maintain visibility and control over working conditions. This lack of transparency increases the risk of exploitation and unethical labour practices.
 - Spend and complexity – high-value contracts and multi-tier supply chains present additional challenges, as visibility decreases further down the chain.
- 4.3. We have embedded robust due diligence processes to mitigate modern slavery risks across our operations and supply chains. Some of the mitigations include:
- Supplier onboarding checks – all new suppliers must confirm compliance with the Modern Slavery Act 2015 and provide evidence of their own policies and procedures. This forms part of our initial vetting process before any contractual engagement.
 - Contractual clauses – our standard contracts include explicit anti-slavery provisions, requiring suppliers to prevent modern slavery within their operations and supply chains. These clauses also grant REACH2 the right to audit suppliers and terminate agreements where breaches occur.
 - Risk-based audits – we conduct audits on suppliers identified as high-risk based on sector, geography, and spend. These audits review labour practices, recruitment processes, and subcontractor arrangements to ensure compliance.
 - Recruitment controls – internally, we apply rigorous checks to verify identity and right-to-work documentation for all staff and agency workers. Recruitment agencies engaged by REACH2 must adhere to our Safer Recruitment Policy and demonstrate compliance with UK employment law.

5. Training and Awareness

- 5.1. Building awareness among staff is critical to preventing modern slavery. We have implemented a comprehensive training programme:
- Mandatory safeguarding training – all staff receive annual safeguarding training, which includes modules on recognising signs of exploitation and trafficking. This ensures that awareness is embedded across the organisation.



- Specialist training for key personnel – staff involved in procurement and HR receive targeted training on identifying modern slavery risks in supply chains and recruitment processes. This equips them to apply due diligence effectively.
- Whistleblowing guidance – we actively promote our Whistleblowing Policy, ensuring staff understand how to report concerns confidentially. Information is available on our intranet and communicated during induction and refresher sessions.

6. Action

- 6.1. During the academic year 2025/26 we will continue to raise awareness amongst central office colleagues and schools of the risks of modern slavery occurring within our supply chains. This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31 August 2024.
- 6.2. We continue to move towards trust-wide contracts with large, established firms, many of which have their own statements or policies on modern slavery. This includes cleaning, catering, supply staffing and all high-value capital contracts.

This statement was agreed by trustees on **11th December 2025**.

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Gavin Robert
Chair of Trustees