

## **Recruit2Schools Ltd – Modern Slavery Statement 2025 (Voluntary Section 54 Equivalent)**

Recruit2Schools Ltd (R2S) fully supports the aims of the Modern Slavery Act 2015 and the associated UK Government guidance (PPN 09/23).

Although R2S is not a 'relevant commercial organisation' as defined under Section 54 of the Act (turnover under £36 million), we voluntarily apply equivalent due-diligence standards across our operations and supply chains.

Our policies and actions are designed to ensure that modern slavery, forced labour and human trafficking have no place within our business or any organisation connected to it.

### **(a) Structure, Business and Supply Chains**

R2S is an independent recruitment and staffing company headquartered in Bridgend, Wales, specialising in the recruitment and supply of qualified education professionals to schools, academies and local authorities.

The company also forms part of a wider group of ethical recruitment businesses which includes healthcare recruitment under separate regulation.

Our supply chain is straightforward and UK-based, covering:

- employment-related suppliers (umbrella/payroll providers where applicable);
- digital-systems providers (Microsoft, Xero, DBS services);
- training/CPD partners.

We do not operate in sectors or regions typically associated with a high risk of labour exploitation.

### **(b) Policies in Relation to Slavery and Human Trafficking**

R2S maintains a Modern Slavery and Human Trafficking Policy, reviewed annually and approved by the Director.

This policy forms part of our governance framework alongside our Equality, Diversity & Inclusion Policy, Safer Recruitment and Vetting Policy, Supplier and Sub-contractor Code of Conduct, and Whistleblowing and Safeguarding Procedures.

All policies clearly prohibit the use of forced, bonded or involuntary labour and require transparency from all suppliers.

### **(c) Due Diligence Processes**

Our due-diligence procedures are proportionate to business size and sector, and include:

- Pre-approval checks for all suppliers and contractors, including confirmation of compliance with the Modern Slavery Act where relevant.

- Verification that all workers engaged by R2S have the Right to Work in the UK under Home Office rules.
- Confirmation of fair pay, transparent employment contracts and voluntary engagement for all staff and supply workers.
- Annual review of any third-party partnerships or umbrella arrangements.
- Maintenance of a Supplier Register detailing compliance status.

These checks are overseen by the Operations & Compliance Manager, supported by our internal Quality Register to track assurance and review outcomes.

#### **(d) Risk Assessment and Management**

Given our operating model—professional recruitment in education, with all placements regulated by the Department for Education and subject to DBS and identity checks—the overall risk of modern slavery within R2S or our immediate supply chain is considered low.

Nevertheless, we assess the following risk areas:

- temporary workforce engagement via any third party;
- overseas recruitment partnerships;
- cleaning, maintenance or outsourced office services.

Where potential risks are identified, mitigation actions include contractual clauses, direct payment models, periodic audits and immediate termination of non-compliant suppliers.

#### **(e) Measuring Effectiveness**

Effectiveness is measured through:

- Annual review of supplier declarations and compliance status;
- Internal spot-checks of payroll and right-to-work documentation;
- Confirmation that all placements are paid through verified PAYE channels;
- Zero recorded incidents of modern slavery or trafficking since incorporation (2017).

These measures are reviewed quarterly by the Directors and form part of our REC Education Audit and EAS compliance inspections.

#### **(f) Training and Awareness**

R2S delivers annual Safer Recruitment and Modern Slavery Awareness Training to all consultants and administrative staff.

This includes recognising indicators of exploitation, ethical recruitment practices and escalation routes under our Whistleblowing Policy.

Refresher sessions are recorded in our Training Matrix, and completion rates are reviewed annually



by the Director.

In addition, we promote awareness through internal briefings and supplier communications, ensuring all partners understand and uphold our zero-tolerance position.

### **Conclusion**

Recruit2Schools Ltd takes a proactive and transparent approach to tackling modern slavery and human trafficking. While not legally mandated under Section 54, we act as though we are, embedding ethical recruitment, staff education and robust due diligence across all business operations. This approach aligns with the principles of the Modern Slavery Act 2015, the PPN 09/23 procurement guidance.

**Approved by:** Emily Phillips – Director

**Date:** September 2025

**Next Review Date:** September 2026

**Recruit2Schools Ltd – Modern Slavery Statement (Voluntary Section 54 Equivalent, PPN 09/23 Compliant)**