

THE HOWARD PARTNERSHIP TRUST

MODERN SLAVERY STATEMENT

Date of review: February 2026

Responsible body: The Howard Partnership Trust

Next due for review: February 2027

Trust Committee: People, Pay & Performance

Review period: Annually

Executive Lead: COO

Status: Statutory

Publication: Trust website

Introduction

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. In line with our values, THPT takes a zero-tolerance approach to modern slavery and human trafficking and ensure we act ethically and with integrity in all our business dealings and relationships. We are committed to implementing and enforcing effective systems and controls to ensure modern slavery and human trafficking is not taking place anywhere in our own business or in any of our supply chains.

This statement is made pursuant to the provisions of Section 54(1) of the Modern Slavery Act 2015 (the 'Act'), for the financial year ending 31 August 2025 and sets out the steps that The Howard Partnership Trust ('THPT') has taken and is continuing to take to ensure that modern slavery of human trafficking is not present or taking place within our organisation or supply chains.

It was approved by the Board of Trustees in February 2026.

Organisational Structure

The Howard Partnership Trust (THPT) operates in the education sector, developing a united partnership of excellent academies where empowered leaders place our learners at the heart of everything and all are supported to be successful. THPT is currently comprised of thirteen academies, a mixture of primary, secondary, and special schools, located in Surrey. The Trust has around 1,500 employees and an annual turnover in excess of £50m.

THPT is an exempt educational charity and a company limited by guarantee.

The Board of Trustees is the strategic board with accountability for all Academies within the Trust.

Commitment

THPT is committed to providing the best possible education for young people of all abilities and backgrounds, enabling them to flourish and thereby increasing their life chances. To ensure that THPT can achieve its mission, it has developed key values and principles. Our approach starts with strong internal communications and relationships across academies, teams, parents, and trustees, and extends through to close working partnerships with our suppliers, regulators, and other stakeholders. As such, THPT is committed to ensuring that practices are in place to prevent business being undertaken with an organisation that has not adopted appropriate steps to ensure that human rights abuses are not taking place in any of its supply chains.

Our recruitment processes are set out in our Recruitment Policy and ensures that all prospective employees are legally entitled to work in the United Kingdom.

In addition, each of the Trust's Academies:

- Undertakes child protection training with all staff, which includes information on modern slavery.
- Has a Safeguarding and Child Protection Policy which raises awareness on modern slavery and is available to staff on the THPT Hub.

THPT staff members are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage. If it is believed or suspected a breach of this Statement has occurred or that it may occur staff are requested to notify their manager or report it in accordance with our Whistleblowing Policy as soon as possible. If staff are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, they are asked to escalate their concerns. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery and human trafficking of whatever form is or may be taking place in any part of our own business or in any of our supply chains.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery and human trafficking throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all our contractors, suppliers, and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

This Statement applies to all persons working for us or on our behalf in any capacity, including employees at all levels, trustees, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives, and business partners.

THPT works towards educating others on slavery and trafficking, through our student curriculum, for example through History in the secondary phase and, through child protection training and work.

This statement is reviewed at Trustee level, and the Executive and Senior Leadership take day-to-day responsibility for ensuring this Statement is followed through in practice. The prevention, detection and reporting of modern slavery and human trafficking in any part of our delivery or supply

chains is the responsibility of all those working for or contracted to provide services for THPT, and staff members are required to avoid any activity that might lead to or suggest, a breach of this statement.

Supply Chain

THPT uses a number of suppliers to support its operations and activities.

THPT procure services and goods from third party providers predominately based in the United Kingdom, where employment legislation is generally both reasonably comprehensive and enforced. All procurement is undertaken under the Trust's Best Value framework, where decision-making is not driven by cost. Large contracts are appointed under tendering arrangements, which are reviewed in line with Government frameworks. We therefore believe that the risk of modern slavery in our supply chain is relatively low.

Although the risk is considered low, THPT remains diligent to the risk and continues to review and improve its policies regularly. As a Trust, THPT works in partnership with its suppliers, building strong working relationships and setting clear expectations. THPT is committed to addressing the effects of poverty and closing the gap between disadvantaged and non-disadvantaged pupils. This commitment also encompasses how the Trust pays its staff, all of whom are vital to the success of its Academies. THPT believes it has a moral obligation to investing in its staff and this includes ensuring everyone is able to provide for themselves and their families. THPT is committed to ensuring that all its employees receive a fair rate of pay for their outstanding work.

Our policies on slavery and human trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. THPT has a continuous and rigorous process for reviewing and updating processes and policies. THPT has a wide policy framework that supports the aims of the Act:

- THPT Recruitment Policy
- THPT Safeguarding & Child Protection Policy
- THPT Whistleblowing Policy
- THPT Grievance & Harassment Policy
- THPT Pay Policy
- THPT Code of Conduct
- THPT Anti-Fraud Corruption and Bribery
- THPT Equality Policy
- THPT Staff Expenses, Benefits and Gifts (including hospitality) Policy

Employees have access to the grievance procedure and Whistleblowing Policy to raise any concerns that they may have had.

Due diligence processes for slavery and human trafficking

As part of our initiative to identify and mitigate risk THPT carries out risk assessments for all its Academies and projects that are managed by the Trust; this includes risk management measures such as risk registers and cross-functional teams to ensure contract and risk oversight of all areas.

These are all constantly reviewed to ensure their continued effectiveness in managing any risk. As part of its continuous policy development, THPT will continue to assess and review the areas of its

processes where the Act could be contravened. THPT considers the risk likelihood of contravention of the Act to be very low.

Culture

THPT is committed to ensuring that the maximum value and benefit is achieved from the funding received. This means that Value for Money is considered a key performance indicator and it is essential for the success of the pupils, academies, and the Trust that we can ensure and evidence that funding is being used in the most effective way.

THPT's commitment to achieving Value for Money does not compromise the obligations contained in the Act; THPT does not look primarily at costs of its suppliers, but instead considers the supplier, the quality and longevity of services and goods, the additional benefits of the supplier relationship and value of the supplier as a partner in achieving the THPT mission, vision, and values. These considerations are embedded in the THPT culture and are a vital safeguard in ensuring that goods or services are provided by suppliers who respect and adhere to the Act.

Training

Training on this statement, and on the risk our operations faces from modern slavery and human trafficking in its supply chains, is available to individuals who work for us; updated training can be provided as necessary. Our zero-tolerance approach to modern slavery and human trafficking is to be communicated to all suppliers, contractors, and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

Any employee who breaches this statement will face disciplinary action, which could result in dismissal for misconduct or gross misconduct. We may terminate our relationship with other individuals and organisations working on our behalf if they breach this statement.

Mr Ian Wilson

Chair of the Board of Trustees

Date: 19 February 2026