# MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

## Introduction

The Harbour Schools Partnership [THSP] is committed to preventing modern slavery and human trafficking in all its operations and supply chains. We expect the same commitment from all suppliers and partners. This statement explains the steps taken during the financial year ending 31 August 2025 to comply with the **Modern Slavery Act 2015**.

## Structure

THSP is a charitable multi academy trust operating 34 primary and 2 secondary schools in Devon. We educate approximately 9,300 students and employ 1800 colleagues. We are united by a shared commitment to excellence through collaboration. We believe the key to delivering outstanding education lies in the strength of our people, the depth of our partnerships, and a clear, strategic vision for growth and development. We believe in the primacy of Headteachers working collaboratively between schools, across teams and with our wider communities to realise the right of every child to flourish.

## Policies

We maintain policies that support our zero-tolerance approach to modern slavery and human trafficking:

- Anti-Fraud, Bribery and Corruption Statements within our Finance Policy – Encourages colleagues to raise concerns, including those related to modern slavery.
- Procurement policies that adhere to procurement law and standards set out in the Academies Handbook.
- Child Protection and Safeguarding Policy – Identifies and supports students at risk of exploitation.
- Recruitment and Selection Policy & Single Central Record– Ensures rigorous checks for all colleagues and agency colleagues.
- Whistleblowing Policy – Provides a confidential route for reporting concerns, including those related to modern slavery.

We work closely with the unions to help reduce risk by improving employee working and pay practices.

## Supply chains

THSP works with UK based suppliers and contractors whose employees are protected under UK employment law. Whilst this significantly reduces exposure to higher risk jurisdictions, we recognise that modern slavery risks can still arise through outsourced services and we need to ensure that companies within our supply chain, share our commitment to treat their employees fairly and ethically. We remain vigilant to ensure our suppliers share our ethical standards.

Our supply chains include education equipment and resources, catering supplies, cleaning and estates supplies and services, ICT equipment and services, uniforms, and supply/agency staffing.

## Key Risk areas

The risks are low due to the sector that the Trust operates in and the close regulation and supervision it receives from the UK Governmental departments. The majority of contracts are with UK-based suppliers, who have long-established relationships within the sector.

The areas within our supply chain that are of the highest risk are catering supplies, premises contracts and supplies, ICT equipment, uniforms, and agency staff. These areas pose higher risks due to external contractors and the possibility of overseas manufacturing.

We mitigate these risks through setting clear expectations of our requirements prior to entering into any agreement and conducting supplier due diligence prior to contract award, including the suppliers ethical training policies and evidence of safeguarding checks.

## Due Diligence

Procurement is supported by the CFO, with further assistance available from the COO and senior colleagues. Our Finance Regulations guide procurement decisions to prevent engagement with unethical suppliers. All suppliers, and their sub-contractors, are required to confirm full adherence to key employment legislation. For high value/risk tender processes, suppliers are required to warrant that they are fully compliant with all employment, equality and environmental legislation and that, where applicable, they are compliant with the annual reporting requirements contained within section 54 of the Modern Slavery Act.

All colleagues are vetted to ensure compliance with statutory requirements, undertake Child Safeguarding training and are familiar with our key policies.

All contractors and staff agencies who work in our schools are required to check an individual's right to work in the UK and carry out a DBS check prior to their staff working in our schools.

## Training

We will continue to raise awareness of modern slavery and human trafficking, through our commitment to safeguarding training for all staff.

Through our induction processes, particularly for those with responsibility for staff on-boarding, supplier due diligence, procurement and contract management.

We will raise awareness of modern slavery and human trafficking through policy development and implementation.

## Monitoring and Reporting

We regularly review and update policies. Procurement processes are monitored to minimise the risk of modern slavery.

Through our due diligence process we expect suppliers to provide safe working conditions, treat workers with dignity, and comply with legal standards. Violations lead to a review, the outcome of which can be a termination of business relationship.

To date, there have been no referrals made in relation to Modern Slavery.

Employees should always seek to raise concerns with their line manager in the first instance. However, if they do not feel they are able to, any employee, governor or stakeholder may raise a concern through the THSP Whistleblowing Policy.

## Conclusion

This statement is made pursuant to section 54(1) of the **Modern Slavery Act 2015** and constitutes THSP's Modern Slavery and Human Trafficking statement for the financial year ended 31 August 2025.

**Gary Chown**
**Chief Executive and Accounting Officer**