

**INVICTUS**

Education Trust

**MODERN SLAVERY &  
HUMAN TRAFFICKING  
STATEMENT**

Approved by Board of Trustees  
29<sup>th</sup> November 2021

To be reviewed by Board of Trustees  
September 2022

# **Modern Slavery and Human Trafficking Statement**

## **Financial Year ending 31<sup>st</sup> August 2021**

### **Introduction**

This statement is published in accordance with the Modern Slavery Act 2015. It sets out the steps taken by Invictus Education Trust and its schools during the financial year ending 31<sup>st</sup> August 2021 to prevent modern slavery and human trafficking in any part of its business.

### **About Invictus Education Trust**

The Trust provides primary, secondary and sixth form education to approximately 5000 students through six secondary schools and one primary school across Dudley and South Staffordshire. Those secondary schools are Crestwood School in Kingswinford, Ellowes Hall Sports College in Dudley, Kinver High School in Kinver, Leasowes High School in Halesowen, Wombourne High School in Wombourne, and Pedmore High School in Stourbridge, Rufford Primary School joined the Trust in September 2021. With its headquarters based at Kinver High School, Enville Road, Kinver, the Trust employees just approximately 750 staff.

### **Risk Assessment and Mitigation**

As part of our initiative to identify and mitigate the risks of modern slavery occurring in any part of the Trust, the Trust will continue to build on processes and procedures, which will be subject to on-going assessment and review.

The Trust has, and will continue to:

- Identify and assess the potential risk areas
- Mitigate the risk of slavery and human trafficking
- Protect whistleblowers

The Trust has identified the following as risk areas:

### **Purchasing and Procurement**

The Trust seeks excellence in every area of the organisation and strives to ensure the highest standards of professionalism, integrity and ethical business practice. The Trust is committed to conducting our business in a lawful manner and this includes engaging with our suppliers to ensure they share our high standards. The Trust buys a range of external goods and services, including construction services, furniture, stationery, electronics, catering services, laboratory equipment, educational supplies, books, cleaning supplies, printing services, waste, recycling services etc. The Trust do so in line with public procurement regulations. A large proportion of these are purchased through frameworks established by collaborative consortia, these suppliers will have a Modern Slavery Statement published on their website.

In the case of capital projects, all tendering for the various required services and provisions will be managed by a designated Project Manager. The Project Manager will be aware of and understand the Trust policy regarding modern slavery and will be expected to ensure that it is complied with by both contractors and sub-contractors.

The Trust expects suppliers to fulfil their obligations to comply with the provisions of the Modern Slavery Act 2015.

All new contracts and those renewing, include a clause requiring that our suppliers, and their subcontractors, comply with the Act, and include the Trust's right to terminate in the instance of any breach of this obligation.

The Trust reserves the right to exclude any bidder, contractor, supplier or service-provider who has been convicted of an offence under the Modern Slavery Act 2015.

### **Child Protection and Safeguarding**

Invictus Education Trust is committed to providing a safe and secure environment for all students, staff and visitors and promoting a climate where students and adults feel confident about sharing any concerns that they may have about their own safety and the well-being of others.

The Trust has designated Safeguarding Leads in each of its schools, dedicated to the safety and welfare of students. Through training the Trust ensures that all Members, Trustees, Governors and staff are able to recognise and understand the signs of slavery and human trafficking, and how to report concerns. Within the Trust there are specialist staff trained in related subjects such as Child Sexual Exploitation.

Our Trust Child Protection and Safeguarding Policy is based on the Department for Education publication: *Keeping Children Safe in Education, September 2021*, all employees are required to read and understand both of these documents.

### **HR & Recruitment**

Invictus Education Trust is committed to safer recruitment processes. All staff recruited to the Trust (including casual staff) will be subject to the Trusts rigorous recruitment procedures in line with Part 3 of *Keeping Children Safe in Education, September 2021*, this includes all relevant statutory vetting checks including criminal records (DBS), right to work and references. For agency and third-party staff (supply staff), the Trust will obtain written confirmation from the agency or third-party organisation, that they have carried out the checks on an individual who will be working in the Trust, the Trust would normally perform for staff.

### **Whistleblowing**

Invictus Education Trust has a Whistleblowing Policy in place, to allow staff, students and others to raise concerns or report any wrongdoing which extends to human rights violations like Modern Slavery. The Trust is committed to ensuring that all concerns raised under the Whistleblowing Policy are investigated and appropriate action taken if required.

This statement will be made available to all staff members, stakeholders and the general public by publication on our website.

All employees of Invictus Education Trust are expected to comply with the Trust's policy, where further training is required, this will be provided by the Trust or by a designated third party.

### **Resources**

<https://www.gov.uk/government/publications/modern-slavery-awareness-booklet>

### **Review of Policy**

This policy is reviewed every 12 months by Invictus Education Trust Board of Trustees. We will monitor the application and outcomes of this policy to ensure it is working effectively.