INVICTUS

Education Trust

Modern Slavery and Human Trafficking Statement Financial Year ending 31st August 2027

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Document Control and Version Control

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Invictus Education Trust

Modern Slavery and Human Trafficking Statement

Financial Year ending 31st August 2027

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1. Our Mission, Vision and Values

Mission

'Excellence every day, unlimited ambition and transforming lives'

Vision

'To create a community of inclusive schools where people choose to learn with us, work with us and belong with us, so that everyone succeeds'

Values

- Respect
- Resilience
- Relationships

2. Introduction

This statement is published in accordance with Section 54 of the Modern Slavery Act 2015. It sets out the steps taken by Invictus Education Trust ("the Trust") and its schools during the financial year ending 31 August 2027 to prevent modern slavery and human trafficking from occurring in any part of its business or supply chains.

The Trust is committed to acting ethically and with integrity in all its relationships and to implementing effective systems and controls to ensure that modern slavery is not taking place within the Trust or its supply chains.

3. About Invictus Education Trust

Invictus Education Trust provides primary, secondary and sixth form education to approximately 6,000 students through six secondary schools and two primary schools across Dudley and South Staffordshire. The Trust's secondary schools are Crestwood School (Kingswinford), Ellowes Hall Sports College (Dudley), Kinver High School (Kinver), Leasowes High School (Halesowen), Wombourne High School (Wombourne), and Pedmore High School (Stourbridge), together with Rufford Primary School (Stourbridge) and Milking Bank Primary School (Dudley).

The Trust's headquarters are based at Kinver High School, Enville Road, Kinver. The Trust employs approximately 800 staff.

4. Risk Assessment and Mitigation

As part of its commitment to identifying and mitigating the risk of modern slavery and human trafficking, the Trust continues to develop and review its processes and procedures on an ongoing basis. 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 areas as presenting the greatest potential risk:

5. Purchasing and Procurement

The Trust seeks excellence in every area of its operations and is committed to the highest standards of professionalism, integrity, and ethical business practice. This includes conducting business in a lawful manner and working with suppliers who share these values.

The Trust procures a wide range of goods and services, including (but not limited to) construction services, furniture, stationery, electronics, catering services, laboratory equipment, educational supplies, books, cleaning supplies, printing services, and waste and recycling services. Procurement activity is undertaken in line with public procurement regulations.

A significant proportion of goods and services are purchased through established frameworks operated by collaborative consortia. Suppliers operating through these frameworks are expected to have their own Modern Slavery and Human Trafficking Statements published on their websites.

For capital projects, tendering and contract management are overseen by an external consultant, Black Cat Consultants, acting on behalf of the Trust. Black Cat Consultants are required to be aware of and operate in accordance with the Trust's Modern Slavery and Human Trafficking Statement and are expected to ensure that all

contractors and sub-contractors engaged on capital projects comply with the provisions of the Modern Slavery Act 2015 and the Trust's ethical standards throughout the project lifecycle. The Trust monitors contractor performance through its contract management arrangements and will investigate any concerns relating to labour practices, safeguarding, health and safety or modern slavery risks.

The Trust expects all suppliers to comply with the provisions of the Modern Slavery Act 2015. All new contracts and contract renewals include clauses requiring suppliers and their subcontractors to comply with the Act, together with the Trust's right to terminate contracts in the event of any breach.

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.

6. Child Protection and Safeguarding

The Trust is committed to providing a safe and secure environment for all students, staff, and visitors, and to promoting a culture in which individuals feel confident to raise concerns about their own safety or the welfare of others.

Each school within the Trust has designated Safeguarding Leads responsible for student welfare. Through regular training, the Trust ensures that Trustees, Associate Governors, and staff are able to recognise the signs of slavery, exploitation, and human trafficking and understand how to report concerns. The Trust also employs specialist staff trained in related areas such as Child Sexual Exploitation.

The Trust's Child Protection and Safeguarding Policy is informed by the Department for Education guidance Keeping Children Safe in Education (current edition). All employees are required to read and understand both the statutory guidance and the Trust's policy.

7. HR & Recruitment

Invictus Education Trust is committed to safer recruitment practices. All staff recruited to the Trust, including casual staff, are subject to rigorous recruitment procedures in line with Part 3 of Keeping Children Safe in Education. This includes all relevant statutory checks, such as Disclosure and Barring Service (DBS) checks, right-to-work verification, and the taking up of references.

For agency and third-party staff, the Trust obtains written confirmation from the supplying organisation that all required checks have been completed to the standard the Trust would normally apply to directly employed staff.

8. Whistleblowing

The Trust has a Whistleblowing Policy in place to enable staff, students, and others to raise concerns or report wrongdoing, including concerns relating to human rights violations such as modern slavery and human trafficking.

The Trust is committed to ensuring that all concerns raised are investigated appropriately and that action is taken where necessary.

9. Communication & Training

This statement is made available to all staff, stakeholders, and members of the public through publication on the Trust and school websites.

All employees are expected to comply with the Trust's statement relating to modern slavery and human trafficking. Where additional training is required, this will be provided by the Trust or an appropriate third party

10. Resources

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

11. Review of Statement

This statement is reviewed annually, approved by the Trust's Executive Team and reported back to the Board of Trustees. The Trust monitors the application and effectiveness of this statement to ensure it remains appropriate and effective.

12. Parental Impact Assessment

As part of the policy review process, consideration has been given to whether the policy, or any changes to it, has a direct impact on parents and carers. This includes assessing whether changes affect parental responsibilities, required actions, communication processes, or understanding of Trust or school practices.

Decision:

The Trust Executive Team has determined that parental communication is:

- ❖ Not required for this policy