

INVICTUS
Education Trust

MODERN SLAVERY STATEMENT

Approved by Board of Directors
February 2019

To be reviewed by Board of Directors
September 2019

Modern Slavery and Human Trafficking Statement

Financial Year ending 31st August 2019

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 31st August 2019 to prevent modern slavery and human trafficking.

About Invictus Education Trust

The Trust provides secondary and sixth form education to approximately 5000 students through six schools across Dudley and South Staffordshire. Those schools are Crestwood School in Kingswinford, Ellowes Hall Sports College in Dudley, Kinver High School in Kinver, Leasowes High School in Halesowen, Ounsdale High School in Wombourne, and Pedmore High School in Stourbridge. With its headquarters based at Ward House, Himley Park, Himley, Dudley, the Trust employs just under 700 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. 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 staff are able to recognise the signs of slavery and human trafficking and within the Trust there are specialist staff trained in related subjects such as Child Sexual Exploitation.

Our Trust Safeguarding Policy is based on the Department for Education publication: *Keeping children safe in education*, September 2016, and all employees are required to read and understand this document.

HR & Recruitment

Invictus Education Trust is committed to safer recruitment processes. All staff recruited to the Trust (including agency staff) will be subject to the Trusts rigorous recruitment procedures, this includes all relevant statutory vetting checks including criminal records (DBS), right to work and references.

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 Directors. We will monitor the application and outcomes of this policy to ensure it is working effectively.