

The logo for Invictus Education Trust features the word "INVICTUS" in a bold, black, sans-serif font. It is flanked by two horizontal yellow lines, one above and one below the text. Below the word "INVICTUS" is a yellow brushstroke-like underline.

INVICTUS

Education Trust

Modern Slavery & Human Trafficking Statement

LEARN WITH **US** - WORK WITH **US** - BELONG WITH **US**

Document Control and Version Control

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Invictus Education Trust
Modern Slavery & Human Trafficking Statement

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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

- 2.1. 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 2026 to prevent modern slavery and human trafficking in any part of its business.

3. Scope of the policy

- 3.1. This policy applies to all employees of the Trust. The policy does not apply to agency workers, consultants or the self-employed.
- 3.2. This policy does not form part of an employee's contract of employment and may be amended at any time following consultation. We may vary application of this procedure, including any timescales for action, as appropriate.

4. About Invictus Education Trust

- 4.1. The Trust provides primary, secondary and sixth form education to approximately 5500 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 approximately 750 staff.

5. Risk Assessment and Mitigation

- 5.1. 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:

6. Purchasing and Procurement

- 6.1. 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.

7. Child Protection and Safeguarding

- 7.1. 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 (DSL) 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 can 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, 2025*, all employees are required to read and understand these documents.

8. HR & Recruitment

- 8.1. Invictus Education Trust is committed to safer recruitment processes. All staff recruited to the Trust (including casual staff) will be subject to the Trust's rigorous recruitment procedures in line with Part 3 of *Keeping Children Safe in Education, 2025*, 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.

9. Whistleblowing

- 9.1. 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.

10. Resources

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

11. Data protection and record keeping

- 11.1. Data will be processed to be in line with the requirements and protections set out in the UK General Data Protection Regulation. The Trust's Data Protection Policy explains what information we collect and why we collect it.