

Modern Slavery Statement

Orbis Group includes Orbis Education and Care Ltd, Pembrokeshire Resource Centre Ltd, Priority Childcare Ltd and Gower Lodge (Swansea) Ltd. Our policies and procedures have been standardised across the Group and all references to Orbis within this document include the entities referred to above.

Organisation

This statement applies to Orbis Education & Care (referred to in this statement as 'the Organisation'). The information included in the statement refers to the financial year 2025/2026.

Organisational structure

The Group consists of services providing Education and or Care to supported individuals, both adults and children with complex needs. Our head office is in Cardiff, South Wales headed up by CEO and Senior Management Team. We employ around 1000 core staff.

We have Homes and Schools throughout Wales.

Definitions

The Organisation considers that modern slavery encompasses:

- Human trafficking
- Forced work, through mental or physical threat
- Being owned or controlled by an employer through mental or physical abuse of the threat of abuse
- Being dehumanised, treated as a commodity or being bought or sold as property
- Being physically constrained or to have restriction placed on freedom of movement.

Commitment

The Organisation acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. The Organisation understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.

The Organisation does not enter into business with any organisation, in the UK or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

No labour provided to the Organisation in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. The Organisation strictly adheres to standards required in relation to its responsibilities under relevant employment legislation in the UK and in many cases exceeds those minimums in relation to its employees.

Key Suppliers and Chains

To fulfil its activities, the main suppliers of and to the Organisation include those related to supply of staff and goods from various suppliers/chains in the UK.

- Technology services
- Financial administration
- Pensions administration services
- Local Authorities
- National Procurement Service
- Social Care Wales
- Teaching Regulation agency
- Premises management
- Staffing agencies

The Organisation considers its main exposure to the risk of slavery and human trafficking to exist with its material suppliers because some products may involve the provision of labour in a country where protection against breaches of human rights. We do expect our suppliers to have robust policies and procedures in place to ensure compliance with the Modern Slavery Act 2015.

In general, the Organisation considers its exposure to slavery/human trafficking to be limited.

Steps

The Organisation carries out due diligence processes in relation to ensuring slavery and/or human trafficking does not take place in its organisation or supply chains, including conducting a review of the controls of its suppliers.

The Organisation has not and will not conduct any business with another organisation which has been found to have involved itself with modern slavery.

In accordance with section 54(4) of the Modern Slavery Act 2015, the Organisation has taken the following steps to ensure that modern slavery is not taking place:

- Training all staff to embed a zero tolerance policy towards modern slavery
- Right to work checks completed at recruitment stage
- Ensure minimum employment age adhered to, in line with the relevant legislation
- Always apply national minimum wage thresholds, in line with the relevant legislation
- Regular contact with material suppliers including their understanding of, and compliance with, our expectations
- We limit the geographical scope of our operations to the UK
- Where possible we build long standing relationships with local suppliers and make clear our expectations of business behaviour
- With regards to national or international supply chains, our point of contact is preferably with a UK company or branch and we expect these entities to have suitable anti-slavery and human trafficking policies and processes.

- We have systems in place to encourage the reporting of concerns and the protection of whistle blowers

This statement is made in pursuance of Section 54(1) of the Modern Slavery Act 2010 and will be reviewed for each financial year.

Date of approval: 01.05.2025

Signed: *AR*

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Job Title: People Director

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