Modern Slavery Statement

Keys Group Limited

Company number 14101282

Introduction

This statement is published in accordance with the Modern Slavery Act 2015. It sets out the steps that Keys Limited and each of its subsidiaries (together "**Keys**") has taken to ensure that slavery and human trafficking is not taking place in any part of our business or our supply chains.

Organisation's structure

The ultimate parent of the Group as of 31 March 2026 is Keys Group Limited which has its registered office at Maybrook House, Third Floor, Queensway, Halesowen, West Midlands. Keys operates in both England and Wales and has over 7000 employees. We currently provide specialist support to more than 23,100 young people, adults and families across all our services in England and Wales.

Our business

Keys is a leading provider of health and social care across our **Three Core Specialisms**

Care

- Children's residential services
- Adults' residential services
- Family assessment centres
- Supported living & supported accommodation
- Resource Centres

Education

- Specialist schools
- Alternative provision through Keys Inclusion Pathways

Health

- ADHD services
- Autism services
- Speech & Language Therapy

Our businesses are regulated by a number of regulators, including Ofsted, CQC and Care Inspectorate Wales. As such we are required to meet compliance with regulatory standards and are regularly inspected against these.

The ethos of Keys is simple. We inspire, encourage and support children, young people and adults to achieve great things and lead happy, healthy and successful lives.

Our core values

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our anti-slavery and human trafficking policy reflects our commitment to acting ethically and with integrity in all our business relationships.

Both modern slavery and human trafficking are incompatible with our core values. Our "EPIC" core values are:

- **Excellence** – Accountable and intent to achieve the best in all we do. Challenging ourselves to the highest standards of learning, development and performance.
- **Passion** – Committed and ambitious in heart and mind, supporting the best outcomes for young people.
- **Integrity** – Working honestly and transparently, sharing our results and learnings.
- **Caring** – Showing compassion and empathy, placing the young person at the centre of all we do, taking their feelings and wishes into account.

These values underpin the whole ethos of Keys and our aim is to embed these core values in every aspect of our business including in our approach and handling of modern slavery and human trafficking.

Our policies relating to slavery and human trafficking

We acknowledge that modern slavery often takes place in the course of employment however the vulnerable people we support may also be exposed to modern slavery, human trafficking and (in the case of young people) child sexual exploitation and criminal exploitation.

As a responsible provider and employer, we have a number of polices that are relevant (either directly or non-directly) to modern slavery, human trafficking and/or child exploitation:

- Anti-Slavery and Human Trafficking Policy
- Child Sexual Exploitation Policy
- Whistleblowing Policy
- Child Safeguarding Policy and Procedure
- Complaints Policy
- Grievance Policy
- Recruitment Policy

All our employees are required to comply with these polices in the course of their employment and where appropriate receive training on them.

Our supply chains

Our supply chains include:

- the supply of permanent and temporary staff via recruitment agencies;
- supply and maintenance of motor vehicles;
- supply and maintenance of IT hardware and software;
- the provision of property support services;
- supply of consumables and medical supplies
- utilities and telecoms; and
- professional services.

Centralised goods & services contracts, accounting for the highest proportion of our spend, are procured by one central management company in order to allow greater oversight and scrutiny of our supply chain. This includes a Supplier Code of Conduct policy that is a condition of both, new contracts, and renewals.

A significant amount of goods such as food and household goods are sourced and purchased locally from commercial retail outlets and are therefore not procured centrally.

Due diligence processes for slavery and human trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business.

We do this by:

- building open and transparent relationships with our partners and make our professional expectations clear; and
- new group supplier contracts are subject to our Supplier Code of Conduct setting out our expectations regarding Modern Slavery, requiring suppliers to uphold principles of Human Rights and Fair Labour, as well as maintaining due diligence processes to identify, assess and manage Modern Slavery risks in their operations and associated supply chains. As part of this process we also collate specific data to monitor and evidence that effective risk management is in place.
- having a whistleblowing policy which encourages concerns to be raised by employees whether full-time or part-time, self-employed contractors, agency workers, volunteers, applicants for employment, people we support and their families, relations and friends, suppliers, commissioners, contractors and the general public; and

We expect all those who we deal with on a professional level to comply with our values and we will be requesting that our suppliers have a suitable statement that mirrors Keys.

We also have in place systems to:

- confirm the identities of all our new employees and their right to work in the UK and our recruitment process complies with our regulatory guidelines.
- facilitate access to an independent whistle blowing service and to protect whistle blowers; and
- internally monitor the quality of our service provision.

We use a centralised agency staff procurement process to further enhance our stringent assurance checks for agency staff including right to work and advanced DBS checks. Only agency suppliers capable of evidencing agency staff compliance with these stringent requirements are added to the agency system as a potential provider of services to Keys.

Training

All our operational staff are required to undertake mandatory training in relation to safeguarding, whistleblowing, sexual exploitation and criminal exploitation, equipping our colleagues with suitable knowledge and expertise for recognising and reporting any suspected instances of Modern Slavery, as well as providing them with the ability to help and support anyone coming into our care who has been the subject of Modern Slavery.

- Modern Slavery training is provided at induction, we share the Modern Slavery Awareness Booklet with all colleagues in attendance *Modern slavery awareness booklet - GOV.UK* and our Safeguarding e-learning provides additional, ongoing, awareness and guidance.

Additionally, our exploitation specialist adviser also offers bespoke consultations to individual services where there is an identified need or risk factors are escalating. This package includes tailored preventative interventions for individual young people that suit specific learning outcomes in line with local authority's expectations. All consultations include the voice and influence of young people to achieve best practice and uptake of engagement in proactive strategies to keep young people safe and promote healthy relationships.

Environmental Social and Governance (ESG)

Keys have an established ESG strategy that includes compliance with modern slavery principles. We revised our ESG objectives at the start of 2023 and delivered significantly against all of our objectives.

Safeguarding and Residential Director

Keys firmly believes that the safeguarding of the people it supports is everyone's responsibility. Our Safeguarding and Participation Director oversees our strategy and chairs the Safeguarding Committee. The committee steers good practice throughout the whole organisation and encompasses wide representation from across our businesses.

IT Support

We have IT systems in place to ensure that internet activity is strictly filtered to remove as much harmful material as possible and to give the people we support a safe internet experience. We continue to review and invest in our IT systems to ensure that they provide a safe and secure means for young people to access the internet.

All our children's services are encouraged where appropriate to develop social media and mobile phone contracts to go hand in hand with a range of pre-approved guardian apps.

Specialist Support

We have a dedicated specialist support team of advisers to provide training, support and consultation to our services and where required to work directly with young people.

The areas of specialist knowledge covered include:

- exploitation – specific support around trafficking, modern slavery, child sexual exploitation, criminal exploitation, county lines, serious youth violence, gangs, and understanding the risk and formulating risk management and reduction plans;
- substance misuse;
- self-injurious behaviour;
- harmful sexual behaviour; and
- police liaison.

The exploitation adviser has developed and implemented a framework with a set of processes which help our children's residential /education and supported accommodation services to understand the nature of trafficking, modern slavery and exploitation and to formulate care and education plans, that effectively respond to the complex contextual elements that are so often linked to exploitation through modern slavery. The approaches being followed underpins national standards and best practice models around human trafficking and modern slavery and has been extremely effective in supporting the safeguarding of complex young people with high levels of risk due to exploitation and the approaches provide intervention for those with emerging vulnerability factors and peripheral risks.

The police liaison advisor has been a founding member and integral part of a small working group, led by the National Police Chief's Council (NPCC) lead for missing young people. This group has formulated the Children Missing from Care Framework, which provides clear national guidance to care providers, police, local authorities and others about how absence and missing should be responded to. The framework was formally launched at the National Missing Person Conference on 25 May 2023, coinciding also with National Missing Children's Day. Keys has already adopted and

applied the principles set out in the framework, resulting in more effective multi-agency responses to absence and missing, including occasions where young people are or may be victims of modern slavery and/or exploitation.

Our Colleagues

We are committed to paying all our colleagues fairly and all employees of Keys are paid at least the Real Living Wage.

Keys has two colleague forums to ensure the views, concerns and voices of colleagues were heard throughout the business. The forums have agreed terms of reference, the elected representatives meet quarterly and colleagues are encouraged to express views freely on all aspects of the business. Senior members of the group leadership team attend the meetings including our CEO and Chief People Officer. Feedback from the meetings is shared with the rest of the group leadership team to ensure that views are heard, considered and where appropriate action taken.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Keys' modern slavery and human trafficking statement for the financial year ending 31 March 2026



David Manson

Director for and on behalf Keys Group Limited and each member of Keys

Date: 3rd November 2026