

Modern Slavery Statement

Keys Group Limited

Introduction

This statement is published in accordance with the Modern Slavery Act 2015. It sets out the steps that Keys Group Limited and each of its subsidiaries (together “**Keys Group**”) 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

Keys Group are a leading provider of:

- residential care, education and therapy to young people suffering from emotional and behavioural disorders or learning difficulties;
- family assessment services; and
- leaving care services which offers individual support packages to young people aged between 16 to 21 years old.

Each subsidiary company in the Keys Group is listed in the Appendix and the ultimate parent is Keys Group Limited which has its registered office at Maybrook House, Queensway, Halesowen, West Midlands. Keys Group operates in both England and Wales and has over 2100 employees. We currently support around 900 young people and adults across all our services.

Our business

Our business comprises of five divisions being:

- residential care,
- education and skills;
- leaving care;
- family assessment; and
- activity and intervention services.

Our business is 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.

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 Group 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 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 case of young people) child sexual exploitation (“CSE”). As a responsible provider we have a number of policies that are relevant (either directly or non-directly) to modern slavery, human trafficking and/or CSE:

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

All our employees are required to comply with these policies in the course of their employment and where appropriate received 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; and
- utilities and telecoms.

Most of the goods and services list above are procured centrally and it is proposed that going forward most procured goods and services will (so far as is practically possible) be procured by one central management company in order to allow greater oversight and scrutiny of our supply chain.

A significant amount of goods such as food and household goods are sourced and purchased locally from commercial retail outlets 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
- 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.

To 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 the Keys Group.

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.

Training

All our operational staff are required to undertake training in relation to child safeguarding, whistleblowing and CSE. We also employ a dedicated child exploitation specialist adviser who provides face to face training, works along our operational teams to support our young people and liaises with other professionals.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Keys Group's slavery and human trafficking statement for the financial year ending 31 March 2019.

A handwritten signature in black ink, appearing to read "D. Manson", on a white rectangular background.

David Manson

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

Date: 27 June 2019

Appendix
Schedule of Keys Group Companies

No:	Company Name	Co Reg
1	Keys Group Limited	10625350
2	Keys Midco Limited	10627189
3	Keys Bidco Limited	10629989
4	Keys PCE Limited	10660100
5	Keys Care Limited	NI53253
6	Keys Cromlet Care Limited	SC426495
7	Keys QTC Limited	03363263
8	Keys Active 8 Care Limited	05107898
9	Keys Educational Services Limited	03768095
10	Keys BR Limited	03815473
11	Keys Young People Limited	02927657
12	Keys Child Care (Holdings) Limited	04289873
13	Keys Child Care Limited	02928849
14	Keys Stepping Stones Limited	03749791
15	Keys 7KS Limited	NI608728
16	Keys 16 Plus Independent Living Services Limited	05456120
17	Keys Family Assessment Centre Limited	04799067
18	Keys NHG Limited	04600490
19	Keys NHCC Limited	03175741
20	Keys Child Care (IRL) Limited	ROI469427
21	Keys Education & Care Limited	NI605620
22	Keys Education Limited	02134774
23	Rowan Tree Care Limited	05253995
24	Promoting Positive Lives Limited	04084329
25	Keys Group PCE (Holdings) Limited	08991221
26	Keys Group Progressive Care & Education Limited	03849567
27	Keys Group PCE Realty Limited	05930808
28	Keys Group PCE Community Support Services Limited	04944634
29	Keys Group Progressive Education Limited	04949254
30	The Leaving Care Company Limited	05715139
31	Keys Specialist Residential Children's Services Limited	06318774
32	Keys CWCH Limited	06306982
33	Keys CWC Limited	04535099
34	Keys KIN Limited	09615208
35	Keys ACE Limited	05556312
36	Keys Care Solutions Limited	04675584
37	Keys Direct Care Limited	04038630