

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 2300 employees. We currently support around 950 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 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 we have a number of policies 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; and
- Recruitment Policy.

All our employees are required to comply with these policies 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;
- utilities and telecoms.

Most procured goods and services are 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 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
- 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 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.

During 2019 we introduced 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 Group.

Training

All our operational staff are required to undertake mandatory training in relation to child safeguarding, whistleblowing, child sexual exploitation and criminal exploitation.

IT Support

Over the last twelve months our dedicated IT team have been working on initiatives to ensure that internet activity is strictly filtered to remove as much harmful material as possible to give the young people we support a safe an internet experience. This includes investment in specialist software to help facilitate this.

Specialist Support

We have a dedicated specialist support team of advisers to act as a resource for our services and work directly with young people. Our specialist team includes an exploitation specialist adviser, a substance misuse adviser, a police liaison adviser and a self-injurious behaviour adviser. The specialist team offer advice, consultation, risk management support and training to all of our services. They also liaise with external agencies to ensure a joined up multi-agency and collaborative response.

The exploitation specialist adviser has developed packages of training around child sexual exploitation and child criminal exploitation all of which encompass the current modern slavery legislation. This will be rolled out to all services operated by Keys Group during 2020 and comes with a package of resources of preventative work for young people. This training seeks to empower staff to identify and report concerns of modern slavery in line with national legislation and company policy.

Direct preventative work for children and young people around the risks of exploitation have also been developed to be included as part of the educational provision, key work sessions and group work within services.

The exploitation specialist adviser works nationally with specialist forums, policing teams and also with the National Modern Slavery team to promote the Home Offices initiative around use of the National Referral Mechanism (“NRM”). The NRM looks to promote wrap around support for victims of modern slavery, advocacy support through criminal justice proceedings and a proactive track and trace system for high risk victims of trafficking. All homes are sent guidance regarding the NRM process where there is evidence of exploitation taking place and sign posted to the National Modern Slavery team for additional support where a young person is high risk.

Throughout 2020 our national police liaison specialist adviser has work closely with staff teams and local police forces to ensure young people identified as being at risk of criminal, sexual, or economic exploitation and trafficking are appropriately supported to mitigate risks to the young people and to support efforts to identify and bring perpetrators of such crimes to justice. The police liaison specialist adviser has also contributed at a national level to work aimed at minimising the exploitation of vulnerable young people and young people missing from care.

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 2020.

A handwritten signature in black ink, appearing to read "D. Manson", followed by a horizontal line.

David Manson

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

Date: 24 July 2020

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 QTC Limited	03363263
7.	Keys Active 8 Care Limited	05107898
8.	Keys Educational Services Limited	03768095
9.	Keys BR Limited	03815473
10.	Keys Young People Limited	02927657
11.	Keys Child Care (Holdings) Limited	04289873
12.	Keys Child Care Limited	02928849
13.	Keys Stepping Stones Limited	03749791
14.	Keys 7KS Limited	NI608728
15.	Keys 16 Plus Independent Living Services Limited	05456120
16.	Keys Family Assessment Centre Limited	04799067
17.	Keys NHG Limited	04600490
18.	Keys NHCC Limited	03175741
19.	Keys Education & Care Limited	NI605620
20.	Keys Education Limited	02134774
21.	Promoting Positive Lives Limited	04084329
22.	Keys Group PCE (Holdings) Limited	08991221
23.	Keys Group Progressive Care & Education Limited	03849567
24.	Keys Group PCE Realty Limited	05930808
25.	Keys Group PCE Community Support Services Limited	04944634
26.	Keys Group Progressive Education Limited	04949254
27.	The Leaving Care Company Limited	05715139
28.	Keys Specialist Residential Children's Services Limited	06318774
29.	Keys CWCH Limited	06306982
30.	Keys CWC Limited	04535099
31.	Keys KIN Limited	09615208
32.	Keys ACE Limited	05556312
33.	Keys Care Solutions Limited	04675584
34.	Keys Direct Care Limited	04038630
35.	Artemis Young Person's Care and Education Services Limited	10515549
36.	Unique Care Homes Support Limited	07399604
37.	South West Childcare Services Limited	09045817

38.	SWCS Property Limited	11057857
39.	Build-A-Future Ltd	04521396

