

# 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.

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 Group.

### **Training**

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

## 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 young people we support a safe internet experience. This includes investment in specialist software to help facilitate this. 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 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 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 was rolled out to all services operated by Keys Group during 2020 and will continue to be delivered as part of a rolling programme to meet identified needs. The training 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. The exploitation specialist adviser works in partnership with tactical advisers from the National Modern Slavery team to inform best practice and emerging trends both within the UK and internationally.

The exploitation specialist adviser works closely with staff teams and school provisions alike to develop direct preventative work for children and young people around the risks of exploitation and proactive exit strategies moving forward. The aim being to upskill and empower individual key workers, education providers and service managers to implement effective interventions to support and promote 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/survivors of modern slavery, advocacy support through criminal justice proceedings and a proactive track and trace system for high risk victims of trafficking. All services are sent guidance regarding the NRM process and support to request a referral be raised by police or local authority. Where there is evidence or indication of exploitation taking place all staff will have an awareness of this process and can be sign posted to the National Modern Slavery team for additional support where a young person is identified as medium/high risk of trafficking or any element of modern slavery, encompassing CSE and county lines.

Throughout 2020 our national police liaison specialist adviser has worked 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.

All staff teams have a clear pathway through information sharing protocol, police liaison and local authority strategy meetings/mapping exercises in which to share any relevant intelligence or concern's relating to modern slavery. These meetings are supported where possible with the attendance of the exploitation specialist advisor or police liaison specialist adviser for Keys Group.

During April and May 2021 Keys Group hosted two national conferences called "*Exploitation; Listen, Understand, Recognise, Protect*". These events were run both internally and externally with the overarching outcomes of sharing best practice, raising awareness, promoting partnership working and consultation with survivors who have lived experiences of modern slavery through exploitation. Both conferences also featured an input from the National Crime Agency's modern slavery tactical adviser and an input around the NRM. An aftercare package was distributed to all attendees with legislation advice and signposting details for any queries regarding modern slavery concerns.

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 2021.

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: 27 July 2021

**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. | Keys Group Properties Limited         | 11057857 |
| 39. | Build-A-Future Ltd                    | 04521396 |
| 40. | Keys Group Holdings Limited           | 13153742 |
| 41. | Southern Adolescent Care Services Ltd | 07093561 |