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 and Accomplish came together in July 2022 to form Keys Group. Each subsidiary company in Keys Group is listed in the Appendix and the ultimate parent as at 31 March 2023 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 5500 employees. We currently provide specialist support to more than 2000 young people, adults and families across all our services in England and Wales.

Our business
Keys Group is a leading provider of care and support and we operate under three distinct brands:

- Accomplish provide specialist residential and supported living services across England and Wales for adults with learning disabilities, autism, mental health needs and acquired brain injuries.

- Keys delivers education and care services for children, young people and families across England and Wales. This is done through specialist schools, residential children's homes, activity and intervention, supported accommodation services, adult resource centre and family assessment centres.

- Peak offer indoor and outdoor activities available to schools and the public across seven adventure centres in the UK.

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 Group 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 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 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; and
- 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;

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.

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 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 whistleblowers; 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 safeguarding, whistleblowing, 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.

Environmental Social and Governance (ESG)

Keys Group have an established ESG strategy that includes compliance with modern slavery principles. We set ourselves a number of ESG objectives at the start of 2022 and delivered significantly against all of our objectives. Additionally, our ESG KPIs are tested quarterly to monitor performance.

Group Safeguarding and Participation Director

Keys Group 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.

Our participation strategy is developing not only to recognise and celebrate the varied localised initiatives throughout the businesses but to harness the enthusiasm of interested parties in making sure the voice of all the children, young people and adults we support is listened to, heard and acted upon in true partnership. The strategy and accompanying framework is developing to cater for the increasingly diverse needs across the business. Opportunities for collaboration with community projects are being further explored, which is providing a gateway to community involvement and strengthening relationships and external networks.

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 childrens 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 is implementing a framework with a set of processes which help our childrens 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. 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 Group 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 Group are paid at least the Real Living Wage.

Keys Group 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 Director of Human Resources. 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.

Keys Group received a silver Investors in People (IIP) award in March 2022 on its first time of participating. The report issued by IIP recognised the positive work going on across the business but also sign-posted us to some key areas for development which have been embedded and now part of our culture and practice.

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 2023.

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

Appendix
Schedule of Keys Group Companies

No:	Company Name	Company Number
1	Keys Group Limited	14101282
2	Union Midco Limited	14101394
3	Union Bidco Limited	14101497
4	Keys Mipco Limited	13832499
5	Keys Acquico Limited	13832741
6	Keys Accomplish Group Limited (formerly Keys Group Limited)	10625350
7	Keys Midco Limited	10627189
8	Keys Bidco Limited	10629989
9	Keys Group Holdings Limited	13153742
10	Keys PCE Limited	10660100
11	Keys Care Limited	NI053253
12	Keys QTC Limited	03363263
13	Keys Active 8 Care Limited	05107898
14	Keys Educational Services Limited	03768095
15	Keys BR Limited	03815473
16	Keys Young People Limited	02927657
17	Keys Child Care (Holdings) Limited	04289873
18	Keys Child Care Limited	02928849
19	Keys Stepping Stones Limited	03749791
20	Keys 7KS Limited	NI608728
21	Keys 16 Plus Independent Living Services Limited	05456120
22	Keys Family Assessment Centre Limited	04799067
23	Keys NHG Limited	04600490
24	Keys NHCC Limited	03175741
25	Keys Education & Care Limited	NI605620
26	Keys Education Limited	02134774
27	Promoting Positive Lives Limited	04084329
28	Keys Group PCE (Holdings) Limited	08991221
29	Keys Group Progressive Care & Education Limited	03849567
30	Keys Group PCE Realty Limited	05930808
31	Keys Group PCE Community Support Services Limited	04944634
32	Keys Group Progressive Education Limited	04949254
33	Keys Supported Accommodation Limited	05715139
34	Keys Specialist Residential Children's Services Limited	06318774
35	Keys CWCH Limited	06306982
36	Keys CWC Limited	04535099
37	Keys KIN Limited	09615208
38	Keys ACE Limited	05556312
39	Keys Care Solutions Limited	04675584
40	Keys Direct Care Limited	04038630
41	Build-A-Future Ltd	04521396
42	Artemis Young Person's Care and Education Services Limited	10515549
43	Unique Care Homes Support Limited	07399604
44	South West Childcare Services Ltd	09045817
45	Keys Group Properties Limited	11057857

46	Southern Adolescent Care Services Limited	07093561
47	Peak Activity Holdings Limited	11000904
48	Peak Activity Services Limited	06824664
49	Considerate Care Limited	04890562
50	Sutura Group Limited	10942811
51	The Ryes College Limited	07571638
52	Anew Young People Services Limited	07871926
53	Accomplish Group Holdco Limited	9052167
54	Accomplish Group Interco Limited	9052320
55	Accomplish Group Midco Limited	9052762
56	Accomplish Group Bidco Limited	9052879
57	Accomplish Group Property Limited	5003339
58	Accomplish Group Limited	2147328
59	Tracscare 2005 Limited	5301437
60	Tracscare 2006 Group Limited	5694147
61	Tracscare 2006 Holdings Limited	5552877
62	Tracscare 2006 Limited	5458148
63	Tracscare 2007 Holdings Limited	6369226
64	Tracscare 2007 Limited	4249850
65	Cascade Care Group Limited	5775330
66	Cascade Care Holdings Limited	5775347
67	The Leaving Care Company Limited	5654058
68	Milton Park Holdings Limited	99608
69	Accomplish Group Employee Limited	9672949
70	Moville Holdings Limited	100426
71	Signia Estates Limited	6145024
72	Kemble Holdings Limited	100383
73	Accomplish Group Support Limited	2187883
74	Milton Care Partnership	n/a - Partnership
75	Kemble Care Partnership	n/a - Partnership
76	Brookdale Care Partnership	n/a - Partnership
77	Accomplish Group Care Limited	5981029
78	Accomplish Group Residential Care Limited	6444254
79	Accomplish Group Specialist Care Limited	7517369
80	Accomplish Group Lifestyles Limited	4949085
81	Accomplish Group (Eilat) Limited	10260099
82	Accomplish Group Lifestyles (South West) Limited	5948111
46	Southern Adolescent Care Services Limited	07093561
47	Peak Activity Holdings Limited	11000904
48	Peak Activity Services Limited	06824664
49	Considerate Care Limited	04890562
50	Sutura Group Limited	10942811
51	The Ryes College Limited	07571638
52	Anew Young People Services Limited	07871926
53	Accomplish Group Holdco Limited	9052167
54	Accomplish Group Interco Limited	9052320

55	Accomplish Group Midco Limited	9052762
56	Accomplish Group Bidco Limited	9052879
57	Accomplish Group Property Limited	5003339
58	Accomplish Group Limited	2147328
59	Tracscare 2005 Limited	5301437
60	Tracscare 2006 Group Limited	5694147
61	Tracscare 2006 Holdings Limited	5552877
62	Tracscare 2006 Limited	5458148
63	Tracscare 2007 Holdings Limited	6369226
64	Tracscare 2007 Limited	4249850
65	Cascade Care Group Limited	5775330
66	Cascade Care Holdings Limited	5775347
67	The Leaving Care Company Limited	5654058
68	Milton Park Holdings Limited	99608
69	Accomplish Group Employee Limited	9672949
70	Moville Holdings Limited	100426
71	Signia Estates Limited	6145024
72	Kemble Holdings Limited	100383
73	Accomplish Group Support Limited	2187883
74	Milton Care Partnership	n/a - Partnership
75	Kemble Care Partnership	n/a - Partnership
76	Brookdale Care Partnership	n/a - Partnership
77	Accomplish Group Care Limited	5981029
78	Accomplish Group Residential Care Limited	6444254
79	Accomplish Group Specialist Care Limited	7517369
80	Accomplish Group Lifestyles Limited	4949085
81	Accomplish Group (Eilat) Limited	10260099
82	Accomplish Group Lifestyles (South West) Limited	5948111
83	Accomplish Group Cymru Lifestyles South Limited	6161800
84	Your Lifestyle Group Limited	10133639
85	Your Lifestyle Nationwide Limited	10146259
86	Construction Alliance Recruitment Limited	5639603
87	Freedom Care Limited	4404828
88	Westhope Limited	5114009
89	Westhope Care Limited	5680915
90	Accomplish Group Contract Management Limited	4908844
91	Westhope Investments Limited	7246091
92	Chepstow House (Ross) Limited	4584013
93	Lyndale (Hereford) Limited	4582959
94	Malvern View (Lydiate) Limited	4579414
95	Blackwells (Hereford) Limited	4954523
96	The Old Posting Office (Haughton) Limited	4813788
97	Homestyle Care Limited	7041636
98	Transparent Care Limited	10071901
99	Monpekson Care Limited	3313742
100	Ace Quality Holding Limited	139915
101	Accomplish Mipco Limited	13832497
102	Accomplish Acquico Ltd	13832783
103	Haven Street Holdings Limited	10659297
104	Positive Circle Limited	10666131
105	Recovery Care Limited	8194218
106	Church Valley Homes Limited	NI620214