

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 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

Each subsidiary company in Keys Group is listed in the Appendix and the ultimate parent as at 31 March 2024 is Keys Group Limited which has its registered office at Maybrook House, Third Floor, Queensway, Halesowen, West Midlands. Keys Group operates in both England and Wales and has over 6500 employees. We currently provide specialist support to more than 2079 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 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; and
- professional services.

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.

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 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 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 revised our ESG objectives at the start of 2023 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 implemented 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 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 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. Recognising a Keys Group priority of investing in our people, we continue to benefit from our engagement with the “*Investors in People: We Invest in People*” framework. As we work towards our first whole group assessment, which is due in early 2025, our investment is particularly focused on evidence in three areas of the assessment framework

(1. *Recognition and Reward*, 2. *Delivering continuous improvement*, 3. *Creating sustainable success*) as well as strengthening communications of our developments as an organisation. Progress in all areas is being supported by our IIP Group, which consists of a number of colleagues representing a variety of roles and services from across Keys Group who continue to meet monthly with a remit of driving change and monitoring progress against our IIP Action Plan.

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 2024

David Manson

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

10 September 2024

Appendix
Schedule of Keys Group Companies

Keys Group		
No:	Company Name	Co Reg
1	Keys Group Limited	14101282
2	Keys Mipco Limited	13832499
3	Keys Acquico Limited	13832741
4	Keys Accomplish Group Limited	10625350
5	Keys Midco Limited	10627189
6	Keys Bidco Limited	10629989
7	Keys Group Holdings Limited	13153742
8	Keys PCE Limited	10660100
9	Keys Care Limited	NI053253
10	Keys QTC Limited	03363263
11	Keys Active 8 Care Limited	05107898
12	Keys Educational Services Limited	03768095
13	Keys BR Limited	03815473
14	Keys Young People Limited	02927657
15	Keys Child Care (Holdings) Limited	04289873
16	Keys Child Care Limited	02928849
17	Keys Stepping Stones Limited	03749791
18	Keys 7KS Limited	NI608728
19	Keys 16 Plus Independent Living Services Limited	05456120
20	Keys Family Assessment Centre Limited	04799067
21	Keys NHG Limited	04600490
22	Keys NHCC Limited	03175741
23	Keys Education & Care Limited	NI605620
24	Keys Education Limited	02134774
25	Promoting Positive Lives Limited	04084329
26	Keys Group PCE (Holdings) Limited	08991221
27	Keys Group Progressive Care & Education Limited	03849567
28	Keys Group PCE Realty Limited	05930808
29	Keys Group PCE Community Support Services Limited	04944634
30	Keys Group Progressive Education Limited	04949254
31	Keys Supported Accommodation Limited	05715139
32	Keys Specialist Residential Children's Services Limited	06318774
33	Keys CWCH Limited	06306982
34	Keys CWC Limited	04535099
35	Keys KIN Limited	09615208
36	Keys ACE Limited	05556312

37	Keys Care Solutions Limited	04675584
38	Keys Direct Care Limited	04038630
39	Keys HH Limited	04521396
40	Artemis Young Person's Care and Education Services Limited	10515549
41	Unique Care Homes Support Limited	07399604
42	South West Childcare Services Ltd	09045817
43	Keys Group Properties Limited	11057857
44	Southern Adolescent Care Services Limited	07093561
45	Peak Activity Holdings Limited	11000904
46	Peak Activity Services Limited	06824664
47	Considerate Care Limited	04890562
48	Sutura Group Limited	10942811
49	The Ryes College Limited	07571638
50	Anew Young People Services Limited	07871926
51	Pathway Care Solutions Group Limited	04214622
52	Pathway Care Solutions Limited	04004053
53	Pathway Care Solutions II Limited	05047496
54	Bryn Melyn Care Limited	06442752
55	Wessex College Limited	04167314
56	Hillcrest Childrens Services Limited	04409479
57	Hillcrest Childrens Services (2) Limited	06924418
58	Union Midco Limited	14101394
59	Union Bidco Limited	14101497
60	Accomplish Group Holdco Limited	09052167
61	Accomplish Group Interco Limited	09052320
62	Accomplish Group Midco Limited	09052762
63	Accomplish Group Bidco Limited	09052879
64	Accomplish Group Property Limited	05003339
65	Accomplish Group Limited	02147328
66	Tracscare 2005 Limited	05301437
67	Tracscare 2006 Group Limited	05694147
68	Tracscare 2006 Holdings Limited	05552877
69	Tracscare 2006 Limited	05458148
70	Tracscare 2007 Holdings Limited	06369226
71	Tracscare 2007 Limited	04249850
72	Cascade Care Group Limited	05775330
73	Cascade Care Holdings Limited	05775347
74	The Leaving Care Company Limited	05654058
75	Milton Park Holdings Limited	99608
76	Accomplish Group Employee Limited	09672949
77	Moville Holdings Limited	100426

78	Signia Estates Limited	06145024
79	Kemble Holdings Limited	100383
80	Accomplish Group Support Limited	02187883
81	Milton Care Partnership	Partnership
82	Kemble Care Partnership	Partnership
83	Brookdale Care Partnership	Partnership
84	Accomplish Group Care Limited	05981029
85	Accomplish Group Residential Care Limited	06444254
86	Accomplish Group Specialist Care Limited	07517369
87	Accomplish Group Lifestyles Limited	04949085
88	Accomplish Group (Eilat) Limited	10260099
89	Accomplish Group Lifestyles (South West) Limited	05948111
90	Accomplish Group Cymru Lifestyles South Limited	06161800
91	Your Lifestyle Group Limited	10133639
92	Your Lifestyle Nationwide Limited	10146259
93	Construction Alliance Recruitment Limited	05639603
94	Freedom Care Limited	04404828
95	Westhope Limited	05114009
96	Westhope Care Limited	05680915
97	Accomplish Group Contract Management Limited	04908844
98	Westhope Investments Limited	07246091
99	Chepstow House (Ross) Limited	04584013
100	Lyndale (Hereford) Limited	04582959
101	Malvern View (Lydiate) Limited	04579414
102	Blackwells (Hereford) Limited	04954523
103	The Old Posting Office (Haughton) Limited	04813788
104	Homestyle Care Limited	07041636
105	Transparent Care Limited	10071901
106	Monpekson Care Limited	3313742
107	Ace Quality Holding Limited	139915
108	Accomplish Mipco Limited	13832497
109	Accomplish Acquico Ltd	13832783
110	Haven Street Holdings Limited	10659297
111	Positive Circle Limited	10666131
112	Recovery Care Limited	8194218
113	Church Valley Homes Limited	NI620214