



Key Housing Association Limited

Modern Slavery and Human Trafficking Statement



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Introduction

Key supports disabled people and people with long-term conditions throughout Scotland. We work alongside each person we support, and their family, to help them live life to the full. We are also a Registered Social Landlord providing housing across Scotland.

This statement reflects our commitment to the updated UK Government guidance on modern slavery reporting (March 2025) under the Modern Slavery Act 2015. It sets out the steps we take to ensure our activities are free from modern slavery and human trafficking.

Modern Slavery

Modern slavery includes exploitative practices such as slavery, forced or compulsory labour, debt bondage, and human trafficking. Victims are often unable to refuse or leave due to threats, violence, coercion, deception, or abuse of power. These individuals are frequently among the most vulnerable in our communities.

About us and how we work

Key is a charity and social care provider operating solely in Scotland, supporting people across 17 local council areas. We are also a housing provider, offering good quality housing and personalised housing solutions.

We act ethically and with integrity in all our business relationships and with our employees. We have a zero-tolerance approach to modern slavery and human trafficking.

Our suppliers are entirely UK based, and we continue to assess risks beyond our direct suppliers, including subcontractors and indirect service providers, where feasible.

The services we use that are most at risk of modern slavery are agency staff providers and property maintenance contractors.

Steps Taken

To reduce the risk of modern slavery in our organisation, we have implemented the following measures:

- A robust and transparent recruitment process aligned with the Scottish Government's Safer Recruitment guidance and the SSSC Code of Practice.
- Verification of candidates' right to work in the UK, criminal records checks, and employment references.
- Fair employment terms in line with UK legislation, including:
 - A secure and safe working environment.
 - Development and career opportunities.
 - Respectful treatment of employees.
 - Fair compensation, with salaries paid directly into individual bank accounts.

We only engage with reputable contractors and suppliers who must comply with relevant legislation and industry codes of practice. Agency staff providers must adhere to the same high standards of safer recruitment and the SSSC Code of Practice.

Our procurement strategy ensures compliance with legal and regulatory requirements and best practice. All suppliers must:

- Comply with relevant legislation and regulations.
- Be registered with appropriate governing bodies.
- Employ appropriately trained and qualified staff.
- Specifically comply with the Modern Slavery Act. If they do not, we have the right to end their contract.

Risks in the Care Sector

We recognise the increased risk of exploitation in the social care sector, particularly among sponsored workers. We are committed to ensuring our recruitment practices and those of our agency partners do not contribute to debt bondage, excessive fees, or unsafe working conditions.

Raising Concerns

We have systems in place to support staff in whistleblowing or raising concerns, which are dealt with promptly and effectively. Employees can report concerns anonymously and without fear of repercussions.

External reporting options are also available, including the Modern Slavery Helpline (08000 121 700) and the Gangmasters and Labour Abuse Authority (GLAA).

Policies

A range of policies help us mitigate the risk of modern slavery, including:

- Recruitment Policy
- Dignity at Work Policy
- Equal Opportunities Policy
- Whistleblowing Policy
- Procurement Policy
- Safeguarding Policies
- Registered Social Landlord's Model Code of Conduct
- SSSC Codes of Practice

Ongoing Commitment

We recognise the need to always be aware of the risk of modern slavery and human trafficking. We continually monitor our processes and will improve these as needed.

In June 2023, the Gangmaster and Labour Abuse Authority (GLAA) reported a significant increase in reports of exploitation within social care. We continue to be vigilant of and raise awareness of these issues.

We will keep our policies and procedures under review over the next financial year. Where needed, we will seek expert advice from organisations such as the Equality and Human Rights Commission and the Trafficking Awareness Raising Alliance. We will also take any further appropriate action to ensure slavery and trafficking are not present in our supply chain or in any part of our own activities.

Approval

This statement relates to the financial year ending on 31 March 2025. It was approved by Key's Board (Workforce Review Group) on 5th November 2025 and is signed on their behalf.

A small, light grey rectangular box containing a handwritten signature in dark ink. The signature appears to be "Andrea Wood".

Andrea Wood
Chief Executive