Modern Slavery Statement 2022/23

Statement on Modern Slavery – Medway Council

1.0 - Introduction

1.1 - This statement is made pursuant to Section 54, Part 6 of the Modern Slavery Act 2015 and sets out the steps that Medway Council (the council) has taken to ensure that modern slavery and human trafficking risks are not taking place in any part of its organisation or in its supply chain.

1.2 - This statement relates to actions and activities during the financial year April 2021 to March 2022.

1.3 The council is absolutely committed to preventing slavery and human trafficking in its own organisation and within its corporate activities, and that its supply chains are free from slavery and human trafficking.

2.0 - Organisational structure and supply chains

2.1 - Medway Council is a unitary authority, providing local government services for a quarter of a million people. It looks after education, environment, social care, housing, planning and business.

2.2 - The council only operates in England

2.3 - The council does not operate in or engage with the supply chain from any countries to be known as having an increased risk for modern slavery and human trafficking issues.

2.4 - The council will regularly monitor lists of high risk countries that are maintained by third party data providers.

2.5 - None of the activities currently performed by or on behalf of the council or by the supply chain are considered to be at high risk of slavery and human trafficking.

3.0 - Relevant policies

3.1 - The council operates the following policies that describe its approach to the identification of modern slavery and human trafficking risks and steps that it has taken to prevent slavery and human trafficking in its operations:

- **Whistleblowing (Speak Up) policy**:

  The council encourages all workers, customers and other business partners to report any concerns related to its direct activities, or the activities of the supply chains. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The whistleblowing procedure is designed to make it easy for disclosures to be made confidentially without fear of discrimination or reprisal.

- **Employee code of conduct:**

  The council's code of conduct makes it clear to employees the actions and behaviour expected of them when representing the council. The council strives to maintain the highest standards of employee conduct and ethical behaviour in its own operations and in the management of its supply chain.

- **Procurement code of practice**:

  The council is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. The council works with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. However, serious violations of the council's supplier code of conduct will lead to the termination of the business relationship and may trigger a notification to the Secretary of State where there is evidence of Modern Slavery or Human Trafficking.

- **Recruitment Agency Framework Agreement:**

  The council uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency as part of its Framework Agreement. Serious violations of the council's Framework Agreement will lead to the termination of the business relationship and may trigger a notification to the Secretary of State where there is evidence of Modern Slavery or Human Trafficking.

4.0 - Training

4.1 - The council is developing a suite of training that will be delivered to its Senior Officers, members of the HR and Procurement team and it will further roll out an awareness programme to all staff.