



Scrutiny Co-ordination Committee

Time and Date

2.00 pm on Thursday, 3rd July, 2025

Place

Committee Room 3 - Council House

Public Business**1. Apologies and Substitutions****2. Declarations of Interest****3. Minutes**

(a) To agree the minutes of the previous meeting held on 5 June, 2025
(Pages 3 - 8)

(b) Matters Arising

4. Coventry Protocol for Addressing Adult Modern Slavery (Pages 9 - 108)

Report of the Director of Law and Governance.

Presentation slides are also attached.

5. The Re-commissioning of the Housing Related Support Services (Pages 109 - 120)

Report of the Director of Care, Health and Housing

6. Scrutiny Co-ordination Committee Work Programme and Outstanding Issues 2025/2026 (Pages 121 - 126)

Report of the Director of Law and Governance

7. Any Other Items of Public Business

Any other items of public business which the Chair decides to take as a matter of urgency because of the special circumstances involved.

Private Business

Nil

Wednesday, 25 June 2025

Note: The person to contact about the agenda and documents for this meeting is Suzanne Bennett, Governance Services - Telephone: 024 7697 2299 E-mail: suzanne.bennett@coventry.gov.uk

Membership: Councillors M Ali, A Jobbar, L Kelly, J Lepoidevin, G Lloyd (Chair), J McNicholas (Deputy Chair), C Miks, G Ridley and R Singh

By invitation: Councillors S Agboola, N Akhtar, P Akhtar, AS Khan, E Reeves

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Coventry City Council
Minutes of the Meeting of Scrutiny Co-ordination Committee held at 2.00 pm on
Thursday, 5 June 2025

Present:

Members:

- Councillor G Lloyd (Chair)
- Councillor J McNicholas (Deputy Chair)
- Councillor A Jobbar
- Councillor L Kelly
- Councillor J Lepoidevin
- Councillor C Miks
- Councillor G Ridley
- Councillor R Singh

Non-Voting Co-opted
Members:

Mrs S Hanson (Church of England representative)
Mr G Vohra (Other Faith Groups representative)

Non-Voting Member (by
invitation):

Councillor S Gray (Substitute for Councillor
E Reeves – Green Group representative)

Other Members
(by invitation):

Councillor P Akhtar (Deputy Cabinet Member for Policing and
Equalities)
Councillor G Duggins (Cabinet Member for Policy and
Leadership)
Councillor A S Khan (Cabinet Member for Policing and
Equalities)

Employees (by Service Area):

Children and Education
Services

R Sugars, C Webb

Law and Governance

S Bennett, M Salmon

Apologies:

Councillor E M Reeves (Green Group representative)
Mr D Jackson (Co-opted Member)

Public Business

Welcome

The Chair, Councillor G Lloyd, welcomed Councillor J McNicholas to his role as the new Deputy Chair of Scrutiny Co-ordination Committee and Councillor L Kelly to her new role as Chair of Education and Children's Services Scrutiny Board (2) for 2025/26.

The Committee congratulated Mrs S Hanson, Co-opted Member, on receipt of the Coventry Award of Merit for her significant contribution to education in Coventry.

1. **Declarations of Interest**

There were no disclosable pecuniary interests.

2. **Minutes**

The minutes of the meeting held on 10th April 2025 were agreed and signed as a true record. There were no matters arising.

3. **Cabinet Member Portfolio Priorities**

The Scrutiny Co-ordination Committee received briefings from the Cabinet Member for Policy and Leadership and the Cabinet Member for Policing and Equalities outlining the priorities for their portfolios for the Municipal Year 2025/26. The Committee noted a number of potential issues for consideration by them including:

- One Coventry Plan
- Job Shop
- Domestic Abuse and Sexual Violence
- Modern Day Slavery
- Deaths by irresponsible cycling – new legislation

The following items were identified as potential items for the Boards indicated:

- Illegal activity relating to electric bikes and parking enforcement, including the use of digital technology - Communities and Neighbourhoods Scrutiny Board (4)
- Diversity and Inclusion, and Community Inclusion - Finance and Corporate Services Scrutiny Board (1)

RESOLVED that the Scrutiny Co-ordination Committee notes the priorities outlined by the Cabinet Member for Policy and Leadership and the Cabinet Member for Policing and Equalities for the Municipal Year 2025/26 and the potential issues for consideration by the Committee.

4. **Coventry One Strategic Plan and Education Capital Programme 2024 - 2028**

The Scrutiny Co-ordination Committee considered a report of the Director of Children and Education, that would also be considered at the meeting of Cabinet on 10th June 2025, on the proposed Coventry One Strategic Plan for Primary, Secondary and Special Educational Needs (SEN) Education 2024-2028. The Plan was attached as an Appendix to the report.

Under Section 14 of the Education Act 1996, Coventry City Council had a statutory duty to ensure sufficient school places and fair, appropriate access to education. It was the Council's role to plan, commission and organise school places in a way that raised standards, and managed supply and demand.

The Coventry One Strategic Plan set out pupil forecasts for primary and secondary schools, as well as Special Education Needs (SEND) across education planning

areas in response to rising or falling pupil cohorts across the city. It was proposed that this Strategy would be a flexible plan, able to adapt to shifting mechanisms of parental preference, unforeseen changes in supply and demand of school places, and future birth rates. To do this, the One Strategic Plan would be monitored and updated annually with presentation to the Cabinet Member whose portfolio included education, and Cabinet, alongside a wider process of constant review of School Place Planning. In addition, the procuring of school places would take place annually so as not to create an unstable number of school places.

There was commitment through a statement of intent to collaborate and work in partnership to achieve the best possible outcomes for children and young people in Coventry, ensure the sustainability of Coventry schools, and to enable the City Council to meet its statutory obligations. The options within the Strategic Plan had been discussed at Coventry Education Partnership meetings including headteachers and education colleagues from across the city.

The Strategy outlined within the One Strategic Plan Appendix was in line with the statutory requirement as outlined by the DfE to:

- i. Spend capital funding efficiently
- ii. Safeguard the quality of places in the system
- iii. Utilise spare capacity in the estate where it exists.

Capital allocations to meet projected shortfalls in provision were provided by the Department for Education (DFE) to all Local Authorities based on the data provided in the annual School Capacity return (SCAP). Demand for places minus the supply of places was multiplied by a cost per pupil place to inform the final allocation. This return informed the DfE of the expected change in pupil numbers over the next few years, the current capacity of schools to meet those numbers and the planned changes to that capacity. Funding was also secured via S106 contributions from housing developers in response to new housing estates. With recent financial allocations this proposed Strategy was sustainable and in keeping with the financial allocations announced.

Since the 2021/22 academic year there had been a large increase in the number of pupils moving into the city in year. The impact of this in-year movement had been that more places were required in schools than forecast, using up spare capacity and causing sufficiency pressures in some year groups. In response, a review and update of pupil forecast methodology had taken place, and additional school expansions as set out in the report. Since September 2024 the Authority had seen a decrease in the level of in-year growth, and would continue to factor a range of growth expectations to inform forecasts and sufficient supply of school places.

In response to rising pupil numbers seen since the academic year 2021/2022, bulge classes had been introduced at nine primary schools across the city, specifically in Years 1 to 5. This increase in demand had also led to expansions in secondary schools, particularly in Years 7 and 8. These measures had helped address immediate pressures on school capacity; however, further expansion would be necessary to ensure sufficient school places were available to meet future forecasted demand. Ongoing planning and funding would be essential to maintain access to quality education as the pupil population changed.

In considering the report and briefing by officers, the Committee asked questions and received responses on matters in the following areas:

- The rationale as to how and why schools were identified for the expansion programme.
- The current SEND provision for the City.
- Information in relation to “bulge” classes, including how consideration is given to oversubscribed schools when identifying locations, and when information will be available as to where those classes will be provided for the next academic year.
- The geographical distribution of places and location of new schools across the City to meet new housing developments and how housing trajectory figures are taken into account, working closely with Planning.
- The provision and funding of cross boundary places.
- Work undertaken to ensure quality is measured and delivered throughout schools in the City.
- Information regarding the use of S106 monies.
- Mental health provision in schools.
- Risks associated with expanding existing schools.
- Work undertaken in relation to attendance and behaviour, including the introduction of a new behaviour pathway in secondary schools.
- Coventry’s funding situation compared to other Local Authorities.
- The high needs deficit and the likely national impact on Local Authorities’ balance sheets of removing the current accountancy mechanism. It was noted that Coventry was in a significantly better position than many Local Authorities.
- Funding for the Woodfield School.
- How the Plan will be implemented, monitored and evaluated.
- Work undertaken with stakeholders.
- Sustainability and environmental issues and the consideration given to these when building and expanding schools.
- Compliance with statutory and DfE requirements.
- Consideration of parking provision for new and expanding schools.

The Committee noted typographical and grammatical errors contained in the report and recommended that these be corrected prior to consideration by Cabinet on 10th June 2025. The report would be updated, published and circulated to all Members of Cabinet.

A Briefing Note detailing Scrutiny Co-ordination Committee’s consideration of the report would be submitted to Cabinet for the meeting on 10th June 2025.

RESOLVED that the Scrutiny Co-ordination Committee recommends that Cabinet approves the Coventry One Strategic Plan and Education Capital Programme 2024-28.

5. Scrutiny Co-ordination Committee Work Programme 2025/26

The Scrutiny Co-ordination Committee received a report of the Scrutiny Co-ordinator that provided the draft Work Programme for Scrutiny Co-ordination Committee for 2025-26, which was attached as an Appendix to the report and

included issues carried over from the Committee's Work Programme 2024/25 and suggested for meetings of the Board in 2025/26.

Scrutiny Work Programmes were working documents and would adapt and change over the year to react to Members' requirements.

The Committee requested that the reference in the Work Programme relating to 'Cost of Living and Poverty' be amended to the Cabinet Member for Public Health, Sport and Wellbeing, Councillor K Caan.

RESOLVED that the Scrutiny Co-ordination Committee notes draft Work Programme attached as an Appendix to the report.

6. Any Other Items of Public Business

There were no other items of public business.

(Meeting closed at 3.45 pm)

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Public report

Cabinet

Scrutiny Co-ordination Committee
Cabinet

3rd July 2025
8th July 2025

Name of Cabinet Member:

Cabinet Member for Policing and Equalities – Councillor A S Khan

Director approving submission of the report:

Director of Law and Governance.

Ward(s) affected:

All

Title: Coventry Protocol for Addressing Adult Modern Slavery

Is this a key decision?

No

Executive summary:

The Council has a legal responsibility to address modern slavery under the Modern Slavery Act 2015, and the Modern Slavery: Statutory Guidance for England and Wales (under s49 of the Modern Slavery Act 2015). Locally, our modern slavery approach is coordinated through various subgroups within the Community Safety Partnership. Modern slavery and exploitation are key priorities in the Coventry Community Safety Partnership Plan 2025-2028. The Coventry Protocol for Addressing Adult Modern Slavery (The Protocol) is the first document to formalise the city's operational and strategic response to adult exploitation.

The Protocol sets out the strategic vision for the Coventry Modern Slavery Partnership, the city's multi-agency forum tasked with determining and implementing the strategic response to adult exploitation. The Protocol also presents the operational pathways to guide frontline professionals through the practicalities of modern slavery case management.

The Protocol has the following objectives:

- To present Coventry Modern Slavery Partnership's local strategic approach to modern slavery via the pursue, prevent, protect, prepare approach as set out by the central government.
- To present the operational processes for responding to modern slavery in Coventry via the creation of survivor support pathways. The pathways are diverse and aim to guide staff through every aspect of case management. Some pathways are general

for any professional to use, others have been created by and for priority teams (e.g. Adult Social Care, NHS, and Trading Standards).

- To establish the ongoing monitoring and evaluation mechanisms for the strategy and pathways.

The Protocol was developed between October 2023 – November 2024 by the Coventry Modern Slavery Protocol partnership group. The group was formed of several Council departments and over 30 partner organisations. The Protocol underwent consultation with over 150 professionals as well as a lived experience advisory panel formed of consultants with personal experience of modern slavery in early 2025. The Protocol was presented to the Coventry Community Safety Partnership Board on 12th of May 2025.

The Protocol is being presented to Cabinet. If approval is given, the Protocol will commence at the earliest opportunity following this.

Recommendations:

Scrutiny is recommended to:

- 1) Consider the requirements of the Modern Slavery Act 2015 and the proposed Coventry Protocol for Addressing Adult Modern Slavery as attached as Appendix 1 to this report.
- 2) Identify any further recommendations for Cabinet.

Cabinet is recommended to:

- 1) Consider any comments or recommendations from Scrutiny Co-ordination Committee.
- 2) Consider the requirements of the Modern Slavery Act 2015 and approve the proposed Coventry Protocol for Addressing Adult Modern Slavery as attached as Appendix 1 to this report.
- 3) Request that Coventry Community Safety Partnership receive quarterly updates on the progress of the Protocol from the Harm and Abuse Reduction Partnership.

List of Appendices included:

The following appendices are attached to the report:

- Appendix 1 - Coventry Protocol for Addressing Adult Modern Slavery.
- Appendix 2 - Plan on a Page
- Appendix 3 - Equality Impact Assessment
- Appendix 4 - Membership of Modern Slavery Protocol Partnership Group.
- Appendix 5 - Modern Slavery Protocol Partnership Input Overview
- Appendix 6 - Modern Slavery & Exploitation Governance Structure

Background papers:

Other useful documents

Modern Slavery Act 2015

Modern Slavery: Statutory Guidance for England and Wales (under s49 of the Modern Slavery Act 2015)

Coventry Community Safety Partnership Plan –2025- 2028

Has it or will it be considered by Scrutiny?

Yes

Has it or will it be considered by any other Council Committee, Advisory Panel or other body?

No

Will this report go to Council?

No

Report title: Coventry Protocol for Addressing Adult Modern Slavery.

1 Context (or background)

- 1.1 Modern slavery is an umbrella term which encompasses all forms of slavery, human trafficking, and exploitation. In all forms of modern slavery an exploiter uses means of control such as the threat or use of force, coercion, abduction, fraud, deception, or an abuse of power or vulnerability to exploit another person for personal, financial, or commercial gain. This exploitation may include sexual exploitation, forced labour, domestic servitude, forced criminality, slavery, financial exploitation, or removal of organs. People who are subjected to modern slavery can be children or adults, of any gender, from all backgrounds, countries and communities. In 2024, the Council recorded 167 cases of adult exploitation, of which, 30% related to labour exploitation, 28% related to criminal exploitation and 22% related to sexual exploitation.
- 1.2 Under section 52 of the Modern Slavery Act 2015, specified first responders (including local authorities) have a statutory duty to notify the Home Office of potential survivors of modern slavery.
- 1.3 Modern slavery is a complex, hidden crime which requires many agencies working under a variety of legislation and remits to work collaboratively to prevent and address the problem. A city-wide, multi-agency protocol will ensure coordinated efforts and comprehensive support to combat modern slavery effectively. A multi-agency protocol will address the various aspects of modern slavery, as it brings together diverse expertise and resources, facilitating a unified and stronger response to this pervasive issue.

2 Options considered and recommended proposal

- 2.1 There are two options to consider:
 - a) Take no action – This is not recommended.
 - b) Endorse the Coventry Protocol for addressing adult modern slavery.
- 2.2 The recommended option is b) and the main reasons for supporting this are as follows:
 - 2.2.1 The Protocol will ensure legal compliance with the Modern Slavery Act 2015 and Modern Slavery: Statutory Guidance for England and Wales (under s49 of the Modern Slavery Act 2015).
 - 2.2.2 The Protocol will give an accountable and coordinated response to enable the City Council and its partners to prevent, reduce and address adult modern slavery within the city.
 - 2.2.3 The Coventry Community Safety Partnership will monitor the Protocol on a quarterly basis, ensuring that partners are held accountable for preventing, reducing and addressing modern slavery in Coventry. The modern slavery reporting structure can be found in Appendix 6 of the report.

3 Partnership Consultation

- 3.1 Partners were involved from the outset of the development of the Protocol. All agencies involved in tackling adult exploitation had the opportunity to join the partnership meetings which were well attended. Appendix 4 of the report details the agencies in attendance.

4 The Coventry Protocol for Addressing Adult Modern Slavery

- 4.1 The Coventry Protocol for addressing adult modern slavery has been provided in Appendix 1 of the report and has been summarised in a “plan on the page” format which is available in Appendix 2 of the report. The Protocol takes on three objectives:
 - 4.1.1 To present Coventry Modern Slavery Partnership’s local strategic approach to adult modern slavery via the pursue, prevent, protect, prepare approach as set out by the central government.
 - 4.1.2 To present the operational processes for responding to modern slavery in Coventry via the creation of survivor support pathways. The pathways are diverse and aim to guide staff through every aspect of case management. Some pathways are general for any professional to use, others have been created by and for priority teams (e.g. Adult Social Care, NHS, and Trading Standards).
 - 4.1.3 To establish the ongoing monitoring and evaluation mechanisms for the strategy and pathways.
- 4.2 The objectives cover all aspects of the city’s strategic and operational response to adult modern slavery, with a focus on pursuing and preventing modern slavery crime, protecting survivors and vulnerable people, and preparing professionals and the public to be able to recognise and respond to modern slavery.
- 4.3 The city’s response to child exploitation is coordinated by the Horizon team in Coventry City Council’s Children’s Services, with oversight from Coventry Safeguarding Children’s Partnership. The response to child and adult exploitation is closely aligned, with collaborative relationships between all operational and strategic groups. Please see Appendix 6 of the report for an overview of the child and adult modern slavery governance structure.

5 Timetable for implementing this decision

- 5.1 If approved by Cabinet, the Protocol will be instigated at the earliest opportunity.

6 Comments from the Director of Finance and Resources and the Director of Law and Governance.

6.1 Financial Implications

- 6.1.1 There are no financial implications to the Protocol.

6.2 Legal Implications

- 6.2.1 The Modern Slavery Act 2015 is the main domestic legislation which determines the UK's response to modern slavery. Under section 52 of the Act, specified first responders (including local authorities) have a statutory duty to notify the Secretary of State of potential survivors of modern slavery. All suspected child survivors should be referred into the National Referral Mechanism (NRM), as well as adults who give their consent. In cases where consent is not given, a Duty to Notify (DtN) referral should be made.
- 6.2.2 The Modern Slavery Statutory Guidance is published under section 49(1) of the Modern Slavery Act 2015. The Act requires the Secretary of State to issue guidance to public authorities about the sorts of things which indicate that a person may be a survivor of slavery or human trafficking, and arrangements for providing assistance and support to persons where there are reasonable grounds to believe are survivors of slavery or human trafficking.
- 6.2.3 When conducting work in the modern slavery space, the Local Authority and its partners must also work within other legislation and guidance. These include, the Nationality and Borders Act 2022, Care Act 2014, Crime and Disorder Act 1998, Localism Act 2011, Equality Act 2010, Housing Act 1996, Homelessness Reduction Act 2017 and Homelessness Code of Guidance 2018.
- 6.2.4 The Council is also committed to upholding its responsibility to ethical procurement which is governed by its Contract Procedure Rules (CPRs), which are part of the Council's Constitution. The Council is also subject to a legislative framework including the Procurement Act 2023, Health Care Services (Provider Selection Regime) Regulations 2023, Public Contracts Regulations 2015, Contracts Regulations 2016. In addition to complying with the procurement governance outlined above, the Council ensures compliance to other applicable legislation and Council policies including but not limited to its Employee Code of Conduct and Social Value & Sustainability Policy.

7 Other implications

7.1 How will this contribute to the One Coventry Plan?

<https://www.coventry.gov.uk/strategies-plans-policies/one-coventry-plan>

7.1.1 The One Coventry Plan 2022 - 2030 takes forward the main themes agreed by the Council in recent years. It reaffirms the Council's ambition of "Working together to improve our city and the lives of those who live, work and study here".

- Improving outcomes and tackling inequalities within our communities
- Improving the economic prosperity of the city and regions
- Tackling the causes and consequences of climate change

7.1.2 This ambition is driven through three corporate priorities which directly address the needs of the city:

- 7.1.3 The Coventry Modern Slavery Protocol aligns with the One Coventry priority of improving outcomes and tackling inequalities within our communities, and as the founding organisation of the Coventry Modern Slavery Partnership embodies Coventry City Council's role as a partner, enabler, and leader. The Protocol will support the following priorities of the Regulatory Services Operational Plan.

Priority 5 - Prioritise the safety and wellbeing of our communities.

Priority 6 - Supporting families and individuals with sensitivity and care.

7.2 How is risk being managed?

- 7.2.1 In accordance with the Modern Slavery Act 2015, the Council is obligated to notify the Home Office of potential survivors of modern slavery. This Protocol will ensure a coordinated approach to addressing modern slavery, with oversight provided by the Coventry Modern Slavery Partnership.

7.3 What is the impact on the organisation?

- 7.3.1 The approval of the Protocol will have a limited impact on the organisation. There is no human resource, financial or ICT implication as the plan will be carried out using current resources.

7.4 Equalities / EIA?

- 7.4.1 An Equality Impact Assessment has been completed and is attached at Appendix 3 of the report.

7.5 Implications for (or impact on) climate change and the environment?

- 7.5.1 Modern slavery can have links to place-based and environmental crime; by improving the city's response to modern slavery we reduce the city's impact on the environment. Coventry Modern Slavery Partnership will support improving the Council's objective to tackle the causes and consequences of climate change.

7.6 Implications for partner organisations?

- 7.6.1 The Protocol is a city-wide document which has been developed and committed to by a diverse group of partners, including West Midlands Police, West Midlands Fire Service, Coventry and Warwickshire Integrated Care Board, local registered social landlords and third sector organisations. The Protocol will require them to work collaboratively with Coventry City Council to prevent and disrupt modern slavery and offer support to survivors and vulnerable communities.

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Joy Adams	CCTV and Community Safety	Regulatory Services, Law and Governance	1/05/2025	09/05/2025
Names of approvers for submission: (officers and members)				
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Suzanne Bennett	Governance Services Co-ordinator	Law and Governance	12/05/2025	12/05/2025
Julie Newman	Director of Law and Governance	-	11/06/2025	11/06/2025
Members: Councillor AS Khan	Cabinet Member for Policing and Equalities	-	11/06/2025	12/06/2025

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Coventry Protocol for Addressing Adult Modern Slavery

Coventry Modern Slavery Partnership, working collaboratively to prepare professionals and the public to pursue perpetrators of exploitation, prevent modern slavery offences, and protect survivors of exploitation

Date Published: TBC

Review Date: TBC



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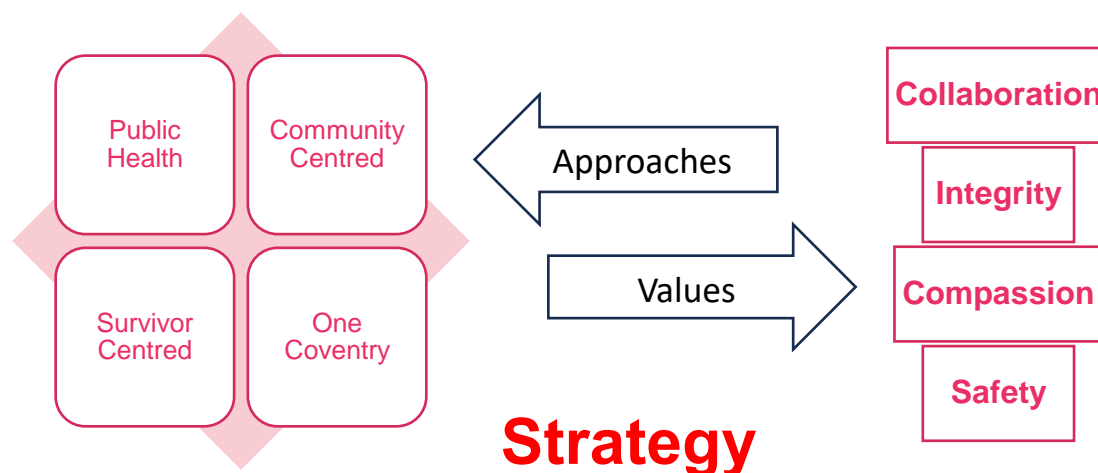
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1. Executive Summary

1.1. Protocol on a Page

Coventry Modern Slavery Protocol Summary

This Protocol sets out the strategic vision for the Coventry Modern Slavery Partnership and the operational pathways that support this vision.



Pursue

- Working in Partnership.
- Gathering Intelligence & Sharing Information.
- Using Legislation to Tackle Exploitation.

Prevent

- Improving Life for At-Risk Communities.
- Early Intervention at the First Signs of Vulnerability.
- Implementing Safe Human Resources & Procurement Practices.

Protect

- Holistic Support for Survivors Throughout their Recovery.
- Multi-Agency Case Management.
- Fulfilling our Legal Responsibilities to Survivors.

Prepare

- Delivering High Quality Training & Awareness Campaigns.
- Encouraging Organisations & Communities to Appoint Modern slavery Ambassadors.
- Amplifying Best Practice & Committing to Continual Improvement.

Pathways

General Pathway:

- Initial Identification & Safeguarding
- NRM Pathway (including Pre-NRM, During-NRM & Post-NRM)
- Access to Specialist Support
- Access to Skills and Employment
- Access to Housing

Organisational Pathways:

- Coventry City Council Adult Social Care
- Coventry City Council Childrens Social Care (for transition to adulthood cases)
- Coventry City Council Trading Standards
- NHS.

Date Published: .

Date: TBC



1.2. Aim

The Coventry Modern Slavery Protocol sets out the strategic vision for the Coventry Modern Slavery Partnership and the operational pathways that support this vision.

1.3. Objectives of Protocol

- To present Coventry Modern Slavery Partnership's strategic approach to preventing, combatting, and addressing modern slavery via the UK Government's 4 P approach to modern slavery.
- To present the operational processes for responding to modern slavery in Coventry via the creation of survivor support pathways.
- To establish the ongoing monitoring and evaluation mechanisms for the strategy and pathways.

1.4. Principles of Protocol

1.4.1. Coventry Modern Slavery Partnership Values

- Collaboration: We will work together, championing best practice and supporting the collective fight against exploitation.
- Compassion: We will place survivors' needs at the heart of our approach, acting with kindness, fairness, and respect.
- Integrity: We will follow through on our commitments, adhering to our principles, and being transparent about our progress.
- Safety: We will prioritise the safety of our communities at all times, ensuring that exploitation is not tolerated in Coventry.

1.4.2. A Public Health Approach to Modern Slavery

The public health approach to modern slavery involves a comprehensive and multidisciplinary approach to prevent, detect, respond to, and support individuals affected by this crime. It recognises that modern slavery is not just a legal or criminal justice issue, but a public health concern that requires action across multiple sectors, including law enforcement, health, social services, education, and community engagement. (Source: [Addressing Modern Slavery: A Public Health Approach for Local Authorities](#))

1.4.3. A Community-Centred Approach to Modern Slavery

The community-centred approach to modern slavery involves localising our approach to directly address the needs of communities in Coventry. It recognises the importance of mobilising assets within our communities to encourage equity amongst our residents and empower individuals to contribute to the fight against modern slavery. Community-centred approaches focus on co-design with those with lived experience of modern slavery, reducing barriers to accessing services, and building social capital.

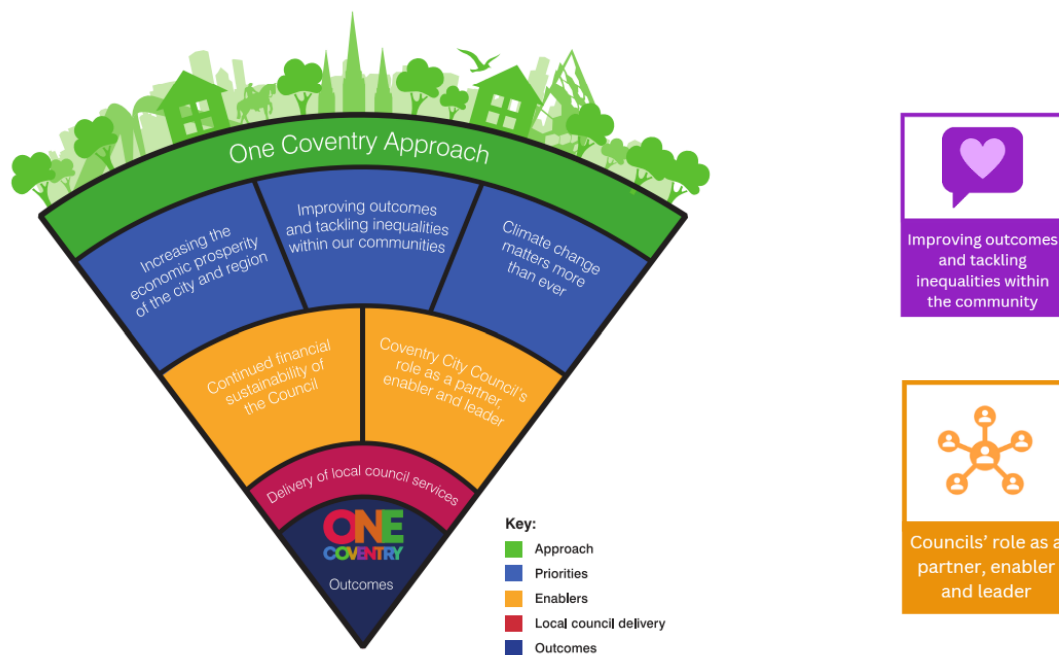


1.4.4. Person-Centred Approach to Modern Slavery

The person-centred approach to modern slavery places the needs and experiences of those subjected to modern slavery at the heart of its response. It places emphasis on the impact of trauma on survivors, dispels the concept of the 'perfect victim', advocates for survivors to be in control of their recovery plan, and encourages professionals to communicate effectively to build trust with the survivors they support. This protocol was co-created with people with lived experience of modern slavery.

1.4.5. One Coventry Approach

The One Coventry Approach describes how the Council works and collaborates with its partners and communities to ensure that Coventry residents get the very best that the city can offer. The Coventry Modern Slavery Protocol aligns with the One Coventry priority of improving outcomes and tackling inequalities within our communities, and as the founding organisation of the Coventry Modern Slavery Partnership embodies Coventry City Council's role as a partner, enabler, and leader.



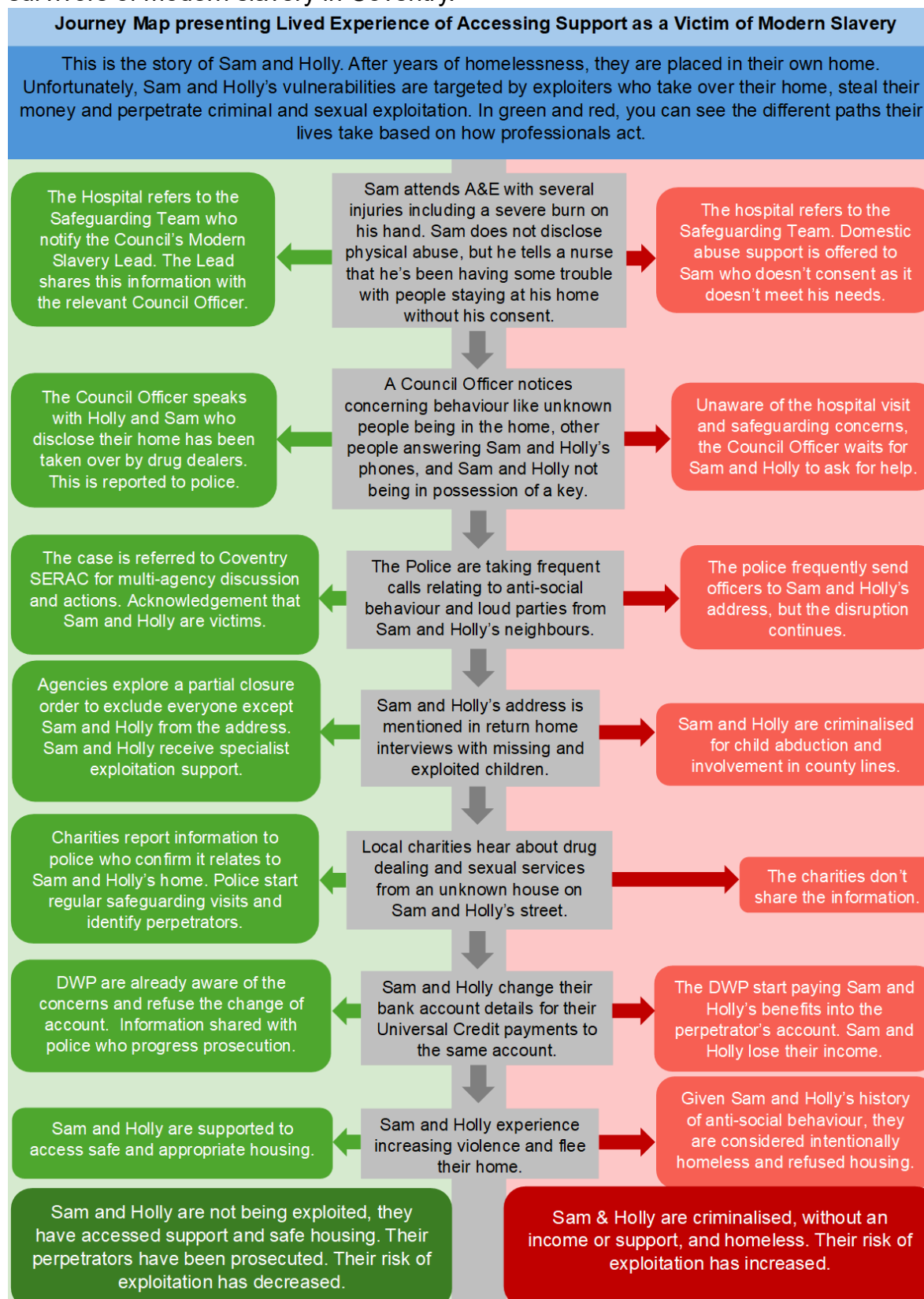
1.5. The Impact of this Protocol on Survivors of Modern Slavery

The below journey map illustrates the impact that professionals' actions have on the lives of people facing exploitation. In red you can see what happens when professionals don't raise their concerns, blame survivors, and criminalise them for what have been forced to do as part of their exploitation. In green you can see the positive impact of raising concerns, sharing information, and taking a survivor-centred approach. Sam and Holly's story is based on the real-life experiences of

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survivors of modern slavery in Coventry.



2. Modern Slavery Overview

2.1. Definition of Modern Slavery

Modern slavery is an umbrella term which encompasses all forms of slavery, human trafficking, and exploitation.

In all forms of modern slavery an exploiter uses means of control such as the threat or use of force, coercion, abduction, fraud, deception, or an abuse of power or vulnerability to exploit another person for personal, financial, or commercial gain.

This exploitation may include sexual exploitation, forced labour, domestic servitude, forced criminality, slavery, financial exploitation, or removal of organs.

People who are subjected to modern slavery can be children or adults, of any gender, from all backgrounds, countries, and communities.

To learn more about modern slavery, [please visit our webpages](#).

At the end of this document there is a glossary to help you understand any new terms you come across.

2.2. Key Legislation & Statutory Guidance

2.2.1. [Modern Slavery Act 2015](#)

The Modern Slavery Act is the main domestic legislation which determines the UK's response to modern slavery, its main provisions include:

- Under section 52 of the Act, specified first responders have a statutory duty to notify the Home Office of potential survivors of modern slavery. All suspected child survivors should be referred into the National Referral Mechanism (NRM), as well as adults who give their consent. In cases where consent isn't given, a Duty to Notify (DtN) referral should be made.
- Clarity of existing modern slavery and human trafficking offences and increase of maximum sentences for these offences from 14 years to life imprisonment.
- The introduction of slavery and trafficking prevention orders and slavery and trafficking risk orders – which can be used to disrupt activities by modern slavery perpetrators.
- The creation of the role of the UK Independent Anti-Slavery Commissioner and placed a duty on authorities, including councils, to cooperate with the role.
- The introduction of support and protection for survivors, including a defence for survivors of slavery or trafficking who commit an offence and measures on the presumption of age of child survivors of modern slavery.



- The introduction of the role of independent child trafficking advocates, now referred to as independent child trafficking guardians.
- The requirement for certain businesses to produce and publish a modern slavery statement, setting out what they are doing to tackle modern slavery and trafficking in their supply chains.

2.2.2. Modern Slavery Statutory Guidance

The Modern Slavery Statutory Guidance is published under section 49(1) of the Modern Slavery Act 2015 which requires the Secretary of State to issue guidance to public authorities about:

- (a) The sorts of things which indicate that a person may be a survivor of slavery or human trafficking.
- (b) Arrangements for providing assistance and support to persons who there are reasonable grounds to believe are survivors of slavery or human trafficking.
- (c) Arrangements for determining whether there are reasonable grounds to believe that a person is a survivor of slavery or human trafficking’.

2.2.3. Nationality and Borders Act 2022

The Nationality and Borders Act 2022 introduced a wide range of measures relating to modern slavery. Section 61 of the Act decreased the minimum entitlement to survivor support from 45 days to 30 days. Section 63 of the Act disqualifies survivors who are considered to be a threat to public order or have claimed to be a survivor in bad faith from receiving protection. Section 65 of the Act narrows access to temporary leave to remain for survivors of slavery or human trafficking.

2.2.4. Care Act 2014

The Act gives local authorities a duty under to provide care and support to adults at risk of various types of abuse, including modern slavery. Local authorities should carry out an assessment to determine whether an adult has eligible needs for any adult who appears to have a need for care and support. A person will have eligible needs if they meet all of the following: they have care and support needs as a result of a physical or a mental condition, because of those needs, they cannot achieve two or more of the outcomes specified and as a result, there is a significant impact on their wellbeing. Outcomes of relevance to survivors of modern slavery might include “being able to make use of the adult’s home safely”, “developing and maintaining family or other personal relationships” and “accessing and engaging in work, training, education or volunteering”.

2.2.5. Crime & Disorder Act 1998

The Crime and Disorder Act 1988 gives local authorities the ability to pursue those perpetrating modern slavery offences.



2.2.6. Localism Act 2011

Section 1 of the Localism Act, 2011 gives local authorities a broad residual power to “do anything that individuals may generally do.” This includes for the benefit of persons resident or present in its area. This may be of relevance where a survivor of modern slavery does not meet the eligibility criteria under the Care Act 2014. Best practice would be for a Human Rights Assessment to be undertaken with a view to providing the survivor with support or assistance under this provision to avoid a breach of his or her human rights.

2.2.7. Equality Act 2010

Section 149 of the Equality Act 2010 requires public bodies to have due regard to the need to ‘advance equality of opportunity’ including to the need ‘take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it’. Hence, survivors of modern slavery who have needs arising from relevant protected characteristics (such as, age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex, sexual orientation) may need to be treated more favourably in terms of the provision of accommodation or services than other persons not suffering from this protected characteristic.

2.2.8. Housing Act 1996

The Housing Act 1996 provides for local authorities to make enquiries of a person who is homeless or at risk of homelessness pursuant to Section 184 Housing Act 1996. Survivors of modern slavery experience many barriers to accessing accommodation under homelessness provisions. For example, survivors can be told that they are not considered to be in priority need. However, when assessing priority need local authorities should consider the unique vulnerabilities of survivors of modern slavery, especially the risk of further exploitation and trafficking, noting that Article 4 of the European Convention on Human Rights prohibits slavery. This should be considered by decision makers when considering whether they are significantly more vulnerable than an ordinary person facing homelessness. Under s206 of the Act, any accommodation provided must be ‘suitable’. This is particularly relevant for survivors of modern slavery who have very specific accommodation needs arising from their experiences including ‘gender specific’ needs.

2.2.9. Homelessness Reduction Act 2017

The Homelessness Reduction Act 2017 supplements and amends the Housing Act 1996, adding new duties to local authorities to prevent and relieve homelessness. These new duties apply to all eligible applicants (i.e. based on immigration status) and are blind to intentionality and priority need. The prevention duty is also blind to local connection. The new ‘relief’ duty does not require the local housing authority to provide accommodation in all cases, but the local authority must help the applicant to find suitable accommodation. The Act also lays out a duty on public authorities to



refer consenting individuals to the local authority for support preventing or relieving homelessness.

2.2.10. [Homelessness Code of Guidance 2018](#)

The Homelessness Code of Guidance 2018 provides guidance about how local authorities should provide assistance and accommodation to those who are homeless or at risk of homelessness. Chapter 25 provides guidance in relation to meeting the housing needs of survivors of modern slavery, including:

- (a) Identification of modern slavery survivors.
- (b) Accommodation enquiries and applications.
- (c) Suitability of accommodation.

(Source: [Council Guide to Tackling Modern Slavery](#))



3. Strategy

3.1. Strategic Vision

The strategic vision of the Coventry Modern Slavery Partnership is to work collaboratively to prepare all professionals and public working and residing in Coventry to pursue perpetrators of exploitation, prevent modern slavery offences, and protect survivors of exploitation.

3.1.1. Strategic Priorities

This strategy is Coventry's local adaptation of the UK government's '4 P Approach to Modern Slavery' which aims to reduce the prevalence of modern slavery in the UK by prioritising four components: prosecuting and disrupting individuals and groups responsible for modern slavery (Pursue); preventing people from engaging in modern slavery crime (Prevent); strengthening safeguards against modern slavery by protecting vulnerable people from exploitation and increasing awareness and resilience against this crime (Protect); and reducing the harm caused by modern slavery through improved survivor identification and enhanced support and protection (Prepare). (Source: [Modern Slavery Strategy](#)).



3.2. Pursue

How we will disrupt individuals and groups responsible for modern slavery.

Goal	What does this look like?	Who is likely to do this work?	What will success look like?
Working in partnership	<p>Multi-agency working to use all available avenues to disrupt and prosecute perpetrators of exploitation.</p> <p>Continued commitment, evaluation, and development to the Coventry Slavery and Exploitation Risk Assessment Conference (SERAC) where cases of modern slavery can be discussed and actioned by a multi-agency panel of knowledgeable professionals.</p>	<p>Local Authority Regulatory Services.</p> <p>Police.</p> <p>Gangmasters and Labour Abuse Authority (GLAA).</p> <p>Home Office.</p> <p>Department for Work and Pensions (DWP).</p>	<p>Services: Good outcomes in pursuing perpetrators of exploitation and disrupting the business of modern slavery.</p> <p>Positive feedback about SERAC.</p> <p>Survivors: I believe agencies around me are working together to help me feel brave and secure enough to contribute to the criminal justice process.</p>
Gathering Intelligence & Sharing Information	<p>Training our staff about when and how they should share information, covering the consideration of confidentiality and the different avenues of reporting information.</p> <p>Equipping our frontline staff with the skills and sensitivity necessary to empower survivors to report their exploiters and participate in the justice process.</p> <p>Monitoring and sharing emerging trends and</p>	<p>Safeguarding Leads.</p> <p>Frontline teams likely to encounter exploitation.</p> <p>Local Authority Modern Slavery Lead.</p> <p>Service Commissioners.</p> <p>Survivor support services.</p>	<p>Services: Increased reporting.</p> <p>Increased survivor participation in the criminal justice process.</p> <p>Better understanding of Coventry's modern slavery profile.</p> <p>Agencies share information with the right people at the right time, in the best interests of the survivor whilst</p>



	<p>themes linked to modern slavery.</p> <p>Support for new, innovative methods of ensuring rigorous data gathering, including academic research and policies that strengthen our ability to understand exploitation in our region.</p>	<p>Offender management services.</p> <p>Modern slavery ambassadors.</p> <p>Local Authority Regulatory Services.</p>	<p>protecting confidentiality.</p> <p>Survivors: I believe the agencies around me will be transparent about how they use and share the information I tell them.</p>
Using Legislation to Tackle Exploitation	<p>We will leverage housing, licensing, and trading standards legislation. We will inspect and regulate rental properties to ensure they are not being used for exploitative purposes. We will monitor, oversee and regulate businesses to prevent them from engaging in or facilitating modern slavery.</p>	<p>Local Authority Regulatory Services.</p>	<p>Services: Increased civil and criminal justice outcomes for perpetrators of exploitation.</p> <p>Survivors: I believe agencies will attempt to hold traffickers to account and that there ways for me to get justice.</p>



3.3. Prevent

How we will prevent people from being subjected to or perpetrating modern slavery.

Goal	What does this look like?	Who is likely to do this work?	What will success look like?
Improving Life for At-Risk Communities	<p>Applying the push and pull factors of exploitation to identify at-risk communities in Coventry.</p> <p>Providing targeted awareness-raising campaigns to educate individuals, communities and businesses who may be at increased risk of exploitation.</p> <p>Delivering interventions to improve at-risk communities' wider determinants of health.</p>	<p>Local Authority Modern Slavery Lead.</p> <p>Services working with at-risk communities.</p> <p>Public Health services.</p> <p>Employability support services.</p> <p>Safeguarding Leads.</p> <p>Modern slavery ambassadors.</p>	<p>Services: Increased reporting from members of the public.</p> <p>Fewer survivors and perpetrators of exploitation.</p> <p>Increased safe employment opportunities.</p> <p>Survivors: I have access to services that are relatable, and survivor led.</p>
Early Intervention at the First Signs of Vulnerability	<p>Survivor support and perpetrator disruption options at first signs of modern slavery risk.</p> <p>Prevention of escalation of exploitation and further harm towards survivors.</p>	<p>Police</p> <p>Survivor support services.</p> <p>Offender management services.</p> <p>Safeguarding Leads.</p> <p>Modern slavery ambassadors.</p>	<p>Services: Fewer survivors being re-trafficked.</p> <p>Fewer survivors trapped in long periods of exploitation.</p> <p>Survivors: Professionals acted to get me out of exploitation and into the right support.</p>



Implementing Safe Human Resources & Procurement Practices	<p>Organisations in Coventry implementing a zero-tolerance approach towards exploitation within their supply chains and workforce.</p> <p>Practicing safe recruitment processes, publishing modern slavery statements, and publicising whistle-blowing systems.</p>	<p>Businesses and organisations who procure products, services and/or employ staff.</p>	<p>Services: Increased reporting from businesses.</p> <p>Increased accordance with employment legislation.</p> <p>Increased focus on sustainable and ethical products and services.</p> <p>Survivors: I feel valued and safe in my workplace.</p>
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3.4. Protect

How we will protect survivors of modern slavery.

Goal	What does this look like?	Who is likely to do this work?	What will success look like?
Holistic Support for Survivors Throughout their Recovery	<p>Local survivor support pathways that reflect the varied services required to ensure holistic, long-term, survivor-centred support.</p> <p>Encouraging growth and innovation in survivor support services.</p> <p>Ability to identify and rectify gaps in service provision by listening to survivors accessing our services and local support providers.</p>	<p>Local Authority Modern Slavery Lead.</p> <p>Survivor support services.</p> <p>Service Commissioners.</p> <p>Frontline teams offering services to survivors.</p> <p>Safeguarding Leads.</p> <p>Modern slavery ambassadors.</p>	<p>Services: More survivors accessing support.</p> <p>Better outcomes for survivors.</p> <p>Positive feedback from survivors about the support they have accessed.</p> <p>Survivors: I was able to access services that gave me the support necessary to help me move forward from my exploitation.</p>
Multi-Agency Case Management	<p>Meeting the needs of survivors by working collaboratively as a city to coordinate comprehensive safeguarding, support, and protection for survivors.</p> <p>Continued commitment, evaluation, and development to the Coventry Slavery and Exploitation Risk Assessment Conference (SERAC) where cases of modern slavery can be</p>	<p>Frontline teams offering services to survivors.</p> <p>Local Authority Modern Slavery Lead.</p> <p>Survivor support services.</p> <p>Safeguarding Leads.</p>	<p>Services: Increased knowledge amongst professionals of service offer across the city.</p> <p>Survivors accessing the right support at the right time.</p> <p>Positive feedback about SERAC.</p>



	discussed and actioned by a multi-agency panel of knowledgeable professionals.	Modern slavery ambassadors.	Survivors: I believe agencies around me are working together to safeguard me from further harm and provide me with appropriate support.
Fulfilling our Legal Responsibilities to Survivors	<p>Ensuring staff working in statutory services have the training and resources needed to be able to complete their legal duties in accordance with best practise guidance. This may include, but is not limited to:</p> <p>First Responder agencies submitting Duty to Notify (DtN) and National Referral Mechanism (NRM) referrals under the Modern Slavery Act 2015.</p> <p>Housing authorities providing appropriate housing and homelessness support in accordance with Homelessness Reduction Act 2017 and the Housing Act 1996.</p> <p>Adult Social Services providing appropriate care and support under the Care Act 2014.</p>	<p>First Responder agencies under the Modern Slavery Act 2015.</p> <p>Statutory agencies involved in the disruption of exploitation and support of survivors.</p>	<p>Services: Increased NRM and DtN referrals.</p> <p>Increased accordance with legislation.</p> <p>Survivors: I believe the services around me understand and comply with their legal duties to survivors of modern slavery.</p>



3.5. Prepare

How we will prepare professionals and the public to better identify and support survivors of modern slavery.

Goal	What does this look like?	Who is likely to do this work?	What will success look like?
Delivering High Quality Training & Awareness Campaigns	<p>Providing data-led training which focuses on the real-time trends, patterns, and needs in Coventry to upskill our staff on recognising exploitation, following proper reporting procedures, and providing trauma-informed support. We will give particular focus to NRM training for frontline professionals who may act as First Responders.</p> <p>Adopting a community approach to addressing exploitation by educating the public about the signs of modern slavery, how to report suspicions, and where to seek help for survivors, with a particular focus on communities vulnerable to exploitation.</p> <p>Consulting with those with lived experience of modern slavery to ensure our training is grounded in the realities of survivors of exploitation.</p>	<p>Local Authority Modern Slavery Lead.</p> <p>Organisations that provide specialist modern slavery training.</p> <p>Frontline teams likely to encounter exploitation.</p> <p>Community organisations.</p> <p>Lived Experience Consultants.</p> <p>Safeguarding Leads.</p> <p>Modern slavery ambassadors.</p>	<p>Services: A high number of frontline teams trained.</p> <p>Positive feedback about training provided.</p> <p>Increased reporting.</p> <p>Survivors: I believe that professionals and the public are properly trained to identify, recognise and report exploitation.</p>
Encouraging Organisations & Communities to Appoint Modern	<p>Encouraging organisations and communities to appoint 'Modern Slavery Ambassadors' who can act as points of contact for guidance and escalation</p>	<p>Local Authority Modern Slavery Lead.</p> <p>Community Groups.</p>	<p>Services: Increase in organisations and teams with a designated Modern Slavery Champion.</p>



Slavery Ambassadors	<p>regarding modern slavery concerns.</p> <p>Providing training opportunities and knowledge sharing sessions to promote continuous learning amongst Modern slavery ambassadors.</p>	<p>Frontline teams likely to encounter exploitation.</p> <p>Safeguarding Leads.</p> <p>Modern slavery ambassadors.</p>	<p>Positive feedback from organisations and teams with a Modern Slavery Champion.</p> <p>Survivors: I believe there are professionals who are knowledgeable about exploitation in the services I use.</p>
Amplifying Best Practice & Committing to Continual Improvement	<p>Use of the Coventry Modern Slavery Partnership, to offer a platform to organisations combatting modern slavery, encourage joint projects, and share examples of exceptional work to enable continual learning from best practice.</p> <p>We will provide ongoing training and reflection opportunities to staff to ensure organisational knowledge remains up to date.</p> <p>We will offer support systems to enable staff to manage the psychological impacts of dealing with modern slavery cases.</p> <p>Giving emphasis to the lived experience of survivors of modern slavery and encouraging all organisations to use</p>	<p>All services involved in addressing modern slavery in Coventry.</p>	<p>Services: Positive feedback about the Coventry Modern Slavery Partnership.</p> <p>Effective monitoring and evaluation mechanisms.</p> <p>Increased use of the lived experience of survivors in service design.</p> <p>Survivors: I was able to use my lived experience to contribute to the services I have used, to highlight necessary changes and make improvements for other survivors.</p>



	lived experience inputs in their service design.		
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4. Pathways

To deliver our strategy, the Coventry Modern Slavery Partnership have developed operational pathways to guide frontline professionals through the practicalities of modern slavery case management.

There are nine pathways in this protocol, which are explained further below.

The General Pathway consists of:

1. The Initial Identification & Safeguarding Pathway
2. The NRM Pathway (including Pre-NRM, During-NRM & Post-NRM)
3. Access to Specialist Support
4. Access to Skills and Employment
5. Access to Housing Pathway

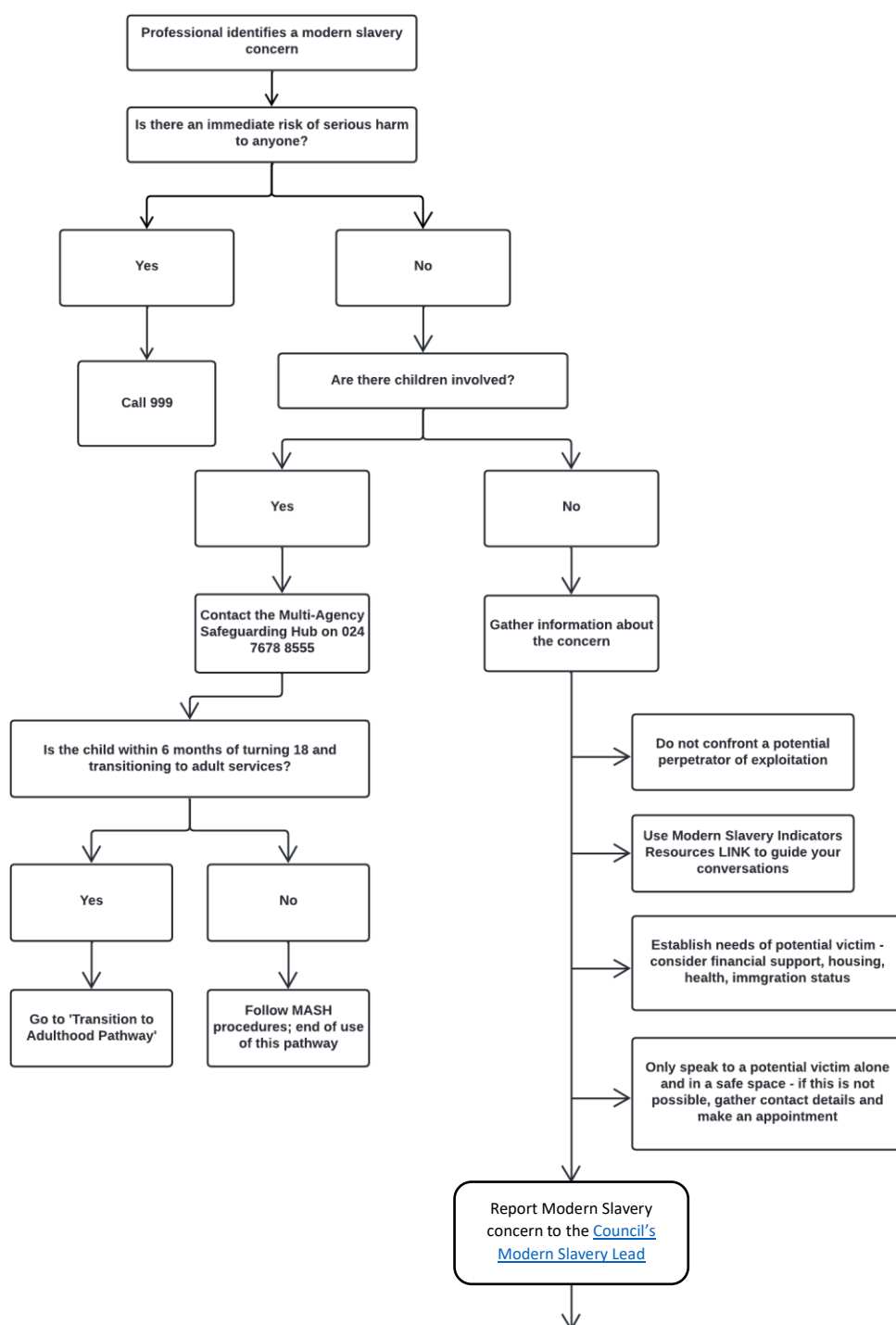
The General Pathway should be used by any professional apart from the following organisations who have their own operational pathways:

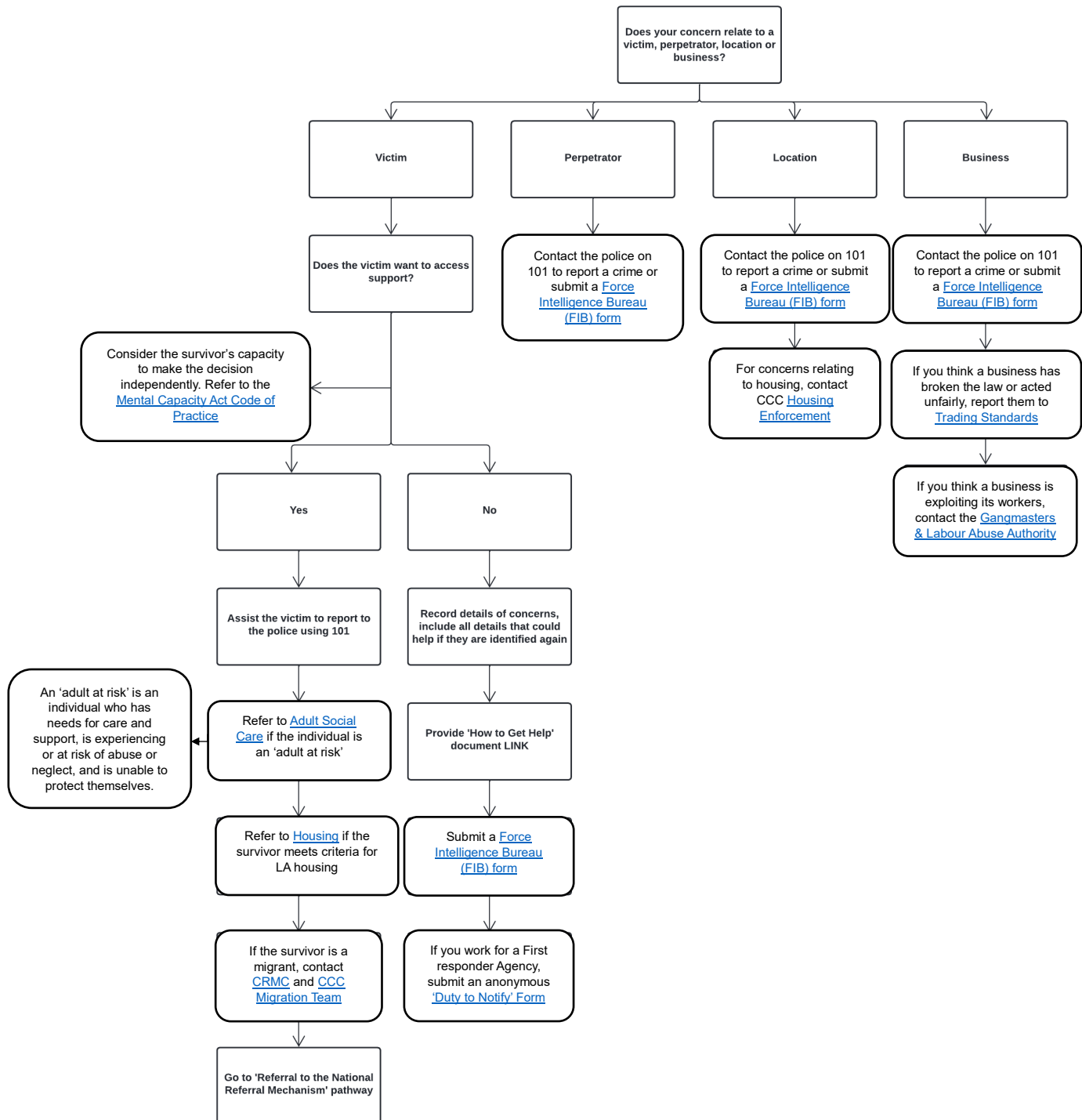
6. Coventry City Council Adult Social Care
7. National Health Service (NHS).
8. Coventry City Council Childrens Social Care (for transition to adulthood cases)
9. Coventry City Council Trading Standards



4.1. Initial Identification & Safeguarding Pathway

This pathway should be followed by all agencies in all cases of modern slavery concerns.





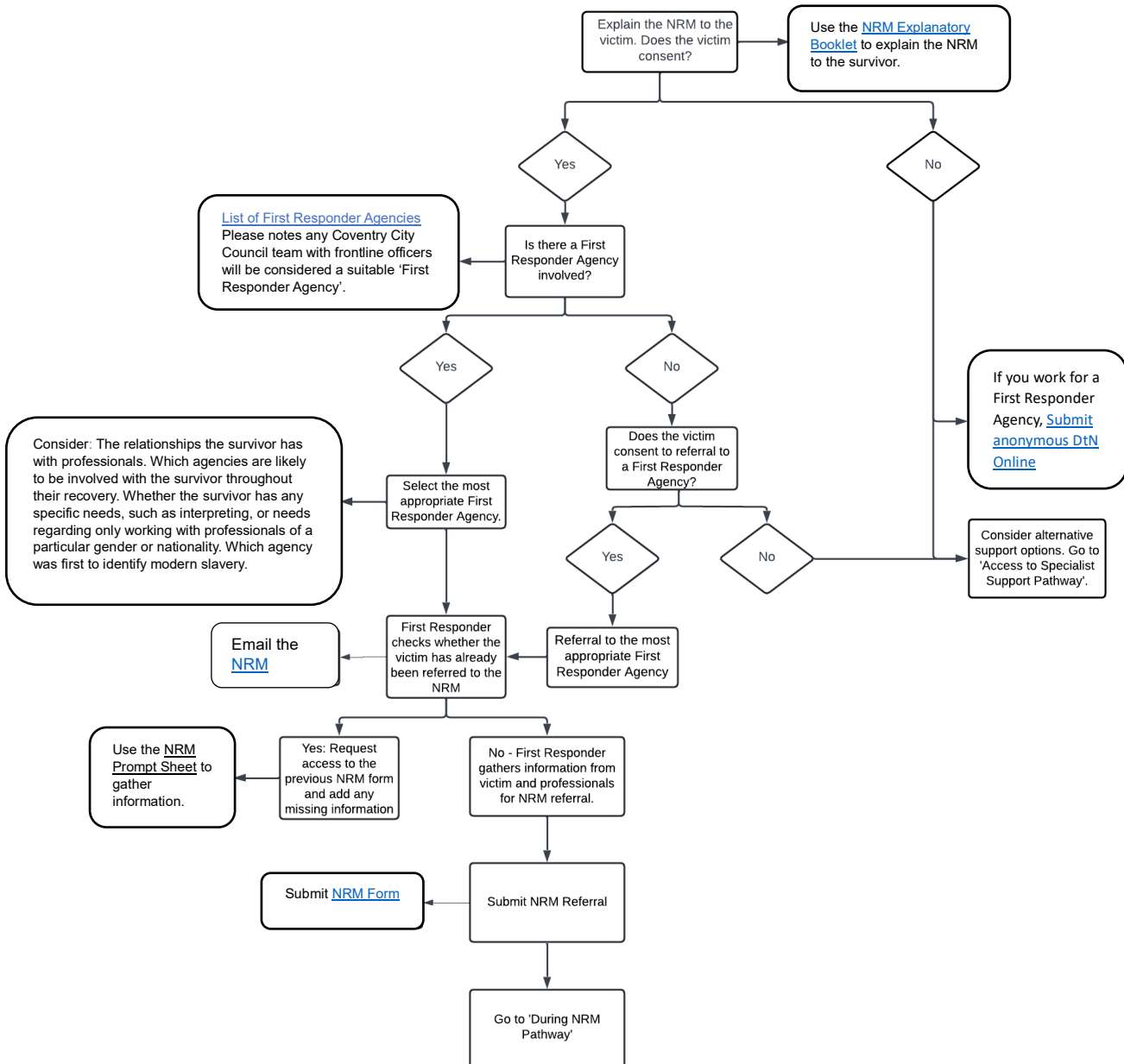
An 'adult at risk' is an individual who has needs for care and support, is experiencing or at risk of abuse or neglect, and is unable to protect themselves.



4.2. Referral to the National Referral Mechanism Pathway

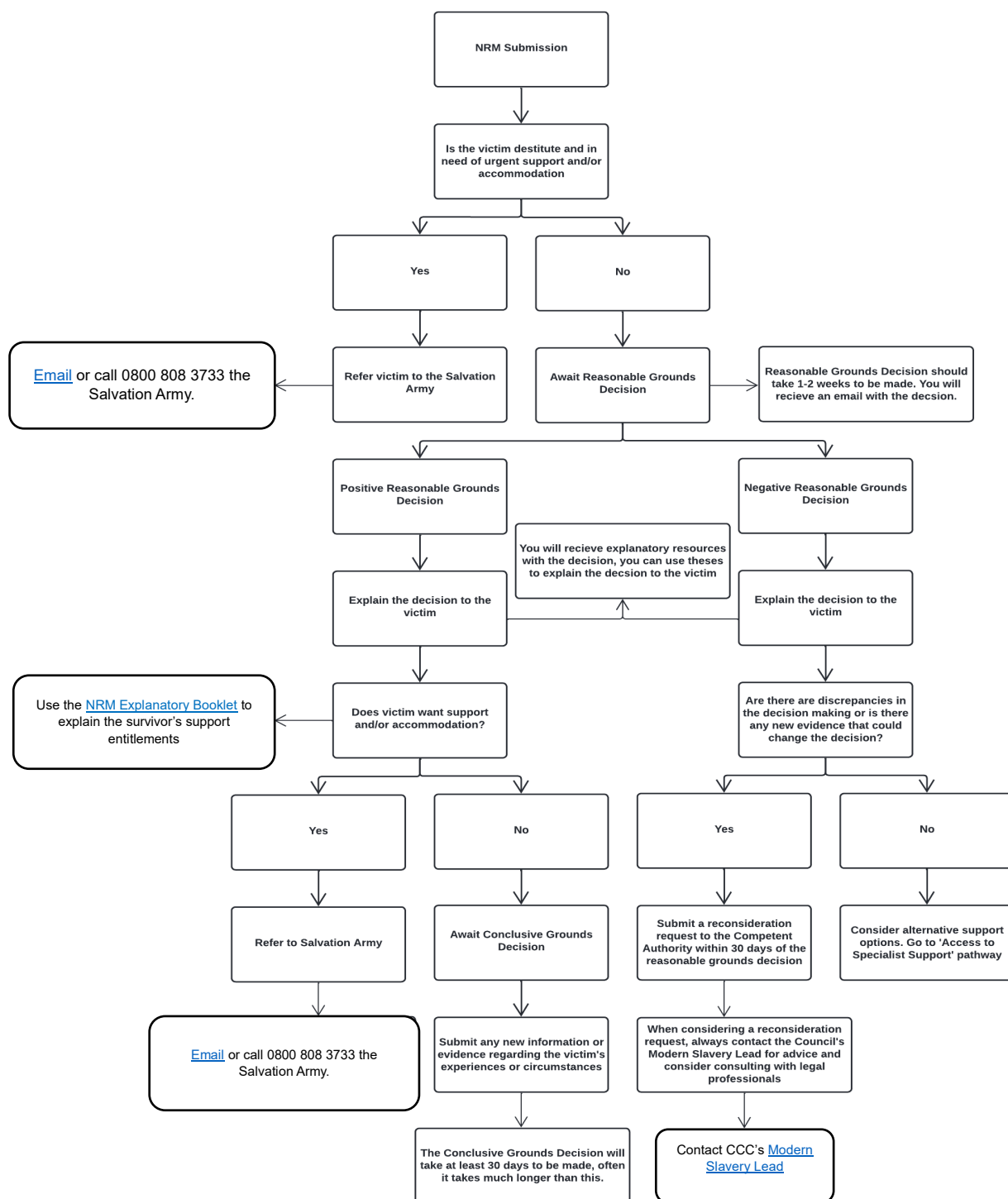
4.2.1. Pre-NRM Pathway

This pathway should be followed by all agencies in all cases of modern slavery concerns.



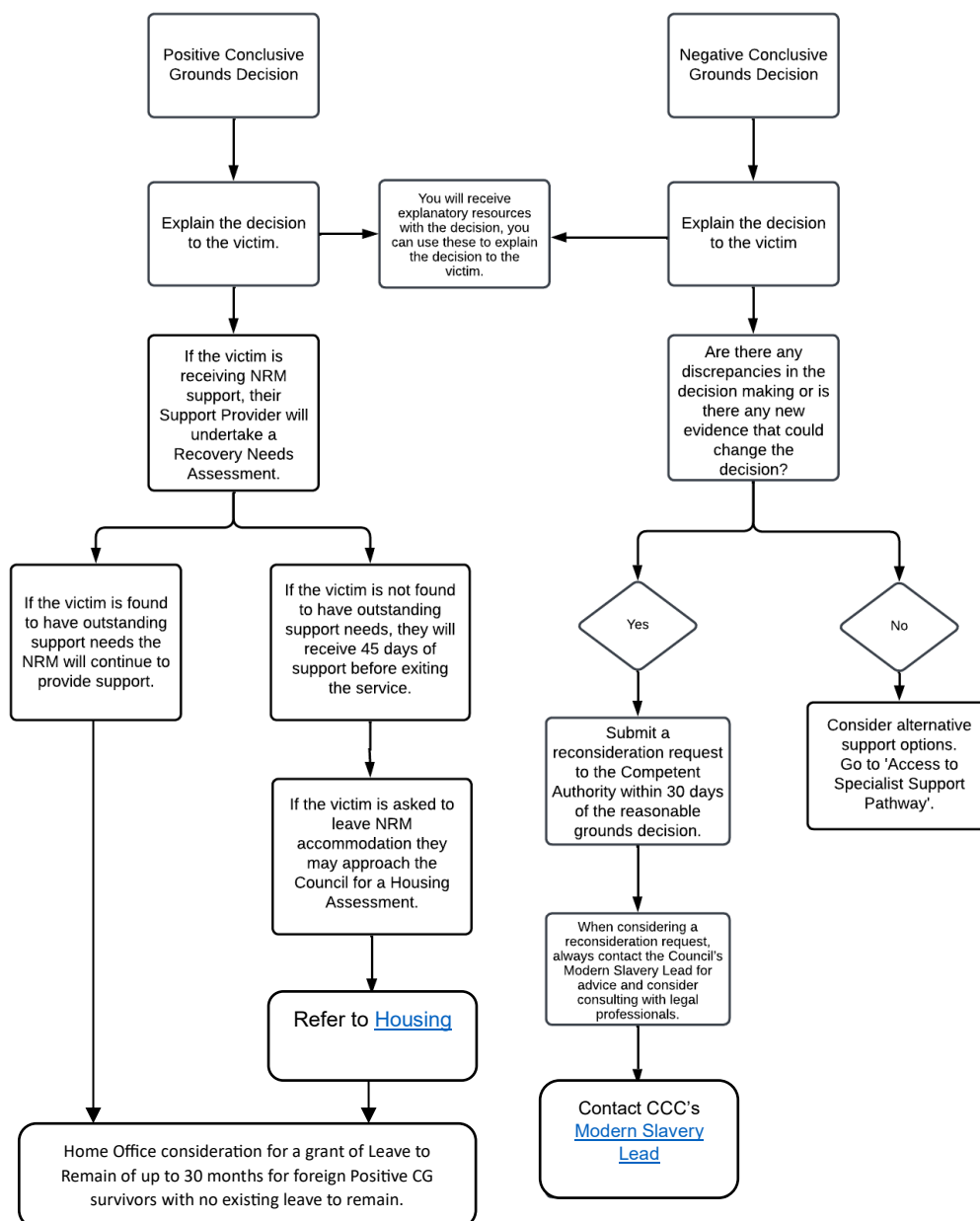
4.2.2. During NRM Pathway

This pathway should be followed by first responder agencies in cases already referred to the National Referral Mechanism.



4.2.3. Post NRM Pathway

This pathway should be followed by first responder agencies in cases where a conclusive grounds decision has been made in the National Referral Mechanism.



4.3. Access to Specialist Support

All

Female

Male

This table should be used by all agencies helping survivors to access support.

Support	Are they currently in the NRM? (Consider contacting the NRM as survivor might not be aware)		Negative RG and/or CG Decision	Positive RG and/or CG Decision
	Yes	No		
NRM Support via Modern Slavery Survivor Care Contract Referrals via The Salvation Army. Support delivered by Black Country Women's Aid & Migrant Help. Specialist outreach support and safe accommodation to survivors and dependents. Range of support including financial, access to health services, emotional wellbeing and access to legal services.	✓			✓
West Midlands Anti Slavery Network Independent Modern Slavery Advocates provide outreach support to survivors at any stage of their recovery.	✓	✓	✓	✓
Adavu Casework support for survivors of modern slavery to rebuild lives pre and post NRM.	✓	✓	✓	✓
Hope for Justice Delivers a national independent advocacy service including specialist socio and legal advocacy	✓	✓	✓	✓
Hope at Home Provides accommodation, gym memberships, therapy sessions, bus passes.	✓			✓
Sophie Hayes Foundation Provides education, skills development, and community support to survivors across their recovery.	✓	✓	✓	✓
Kairos Women Working Together Provides holistic, trauma informed, long term support and advocacy for women who are subject to or at risk of sexual exploitation; including women who face multiple disadvantages and have 'complex' unmet needs	✓	✓	✓	✓
Medaille Trust's Moving on Project Provides survivors with long-term outreach support, referral to NRM, and ABE interviews.	✓	✓	✓	✓
Black Country Women's Aid's Sexual Exploitation and Community Engagement Project Proactively identifies and provides initial support to adult female survivors of sexual exploitation		✓		
West Midlands Anti Slavery Network's SafePlace Emergency safehouse for medium to low needs survivors		✓		



4.4. Access to Skills & Employment

This table should be used by all agencies helping survivors to access support.

Adult Education Service - www.coventry.gov.uk/adulted

Most courses are free if:

- You were born before 31/08/2005.
- You have been living in the UK legally for at least the last 3 years.
- You have an EU/EAA or Swiss citizen, have Settled Status and have lived continuously in the EEA, Switzerland, Gibraltar, or the UK for at least the last 3 years.
- You are a refugee.
- You have discretionary leave to remain.
- You are in the UK on one of the Ukrainian or Afghan schemes.
- You are an Asylum seeker and have been living in the UK while waiting for my claim to be decided for more than 6 months.

[Maths](#)

[English](#)

[Digital Skills](#)

[English Language support – incl. English for Speakers Of Other Languages \(where eligible\)](#)

[Learning for Life](#)

[Learning for Work](#)

[Job Shop](#)

Available to all Coventry residents

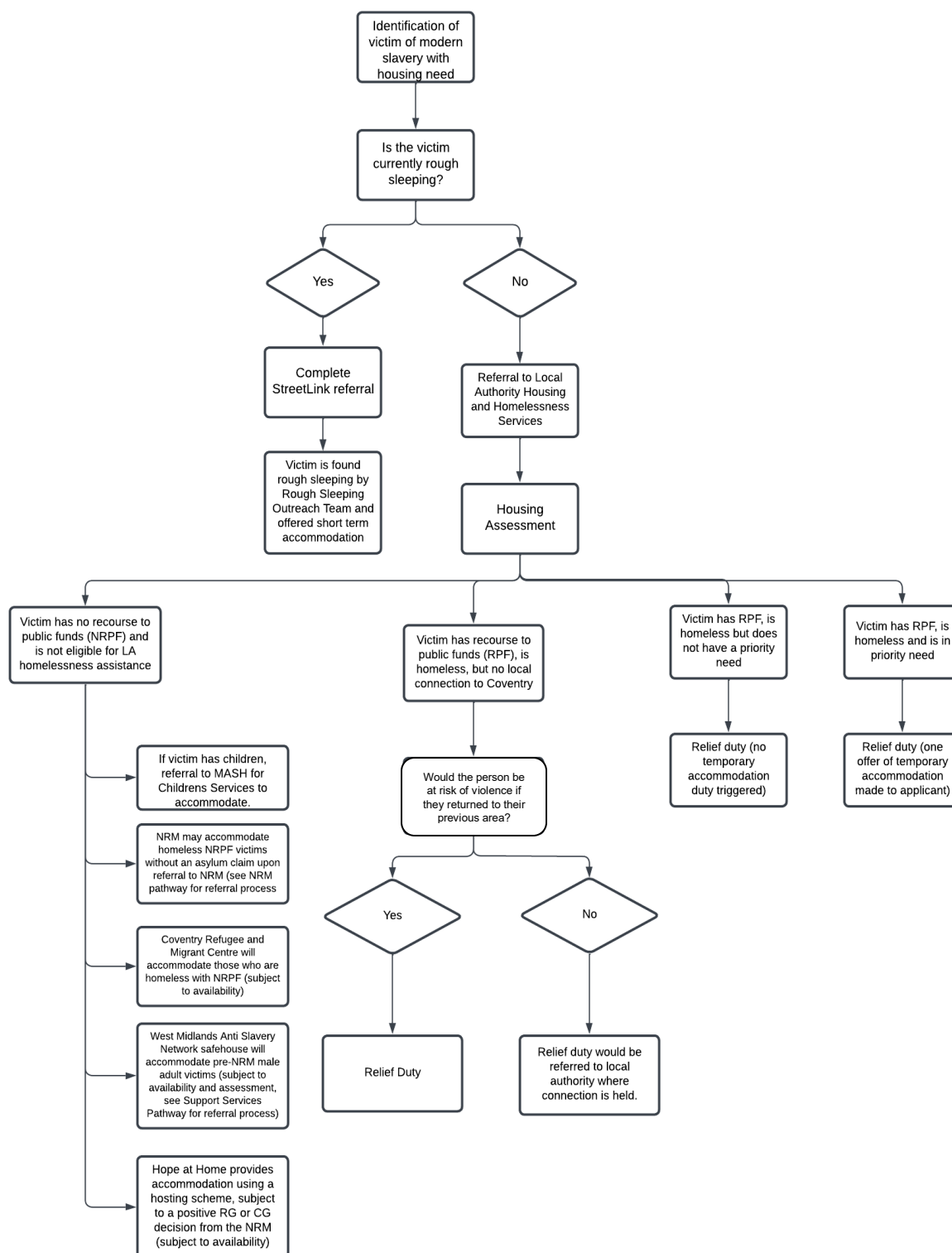
Support includes:

- 1 to 1 Job Coaching.
- Practical Support.
- Direct vacancies from our employer network.
- Exciting events to meet directly with local employers and training providers.
- Careers Advice.
- Money Advice.
- Barrier Breaking Support.
- Health and Wellbeing Support.



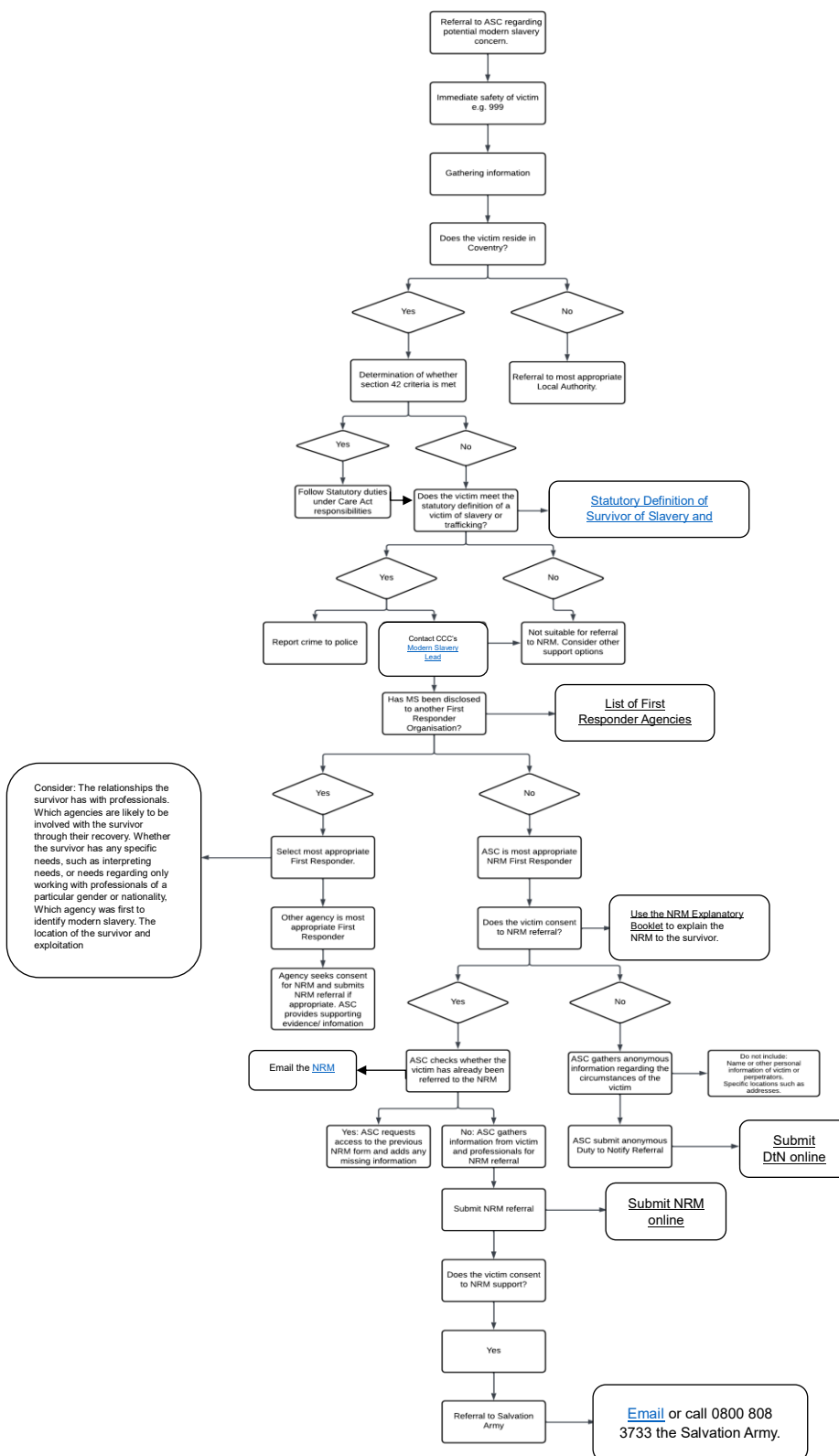
4.5. Access to Housing Pathway

This pathway should be used by all agencies helping survivors to access accommodation.



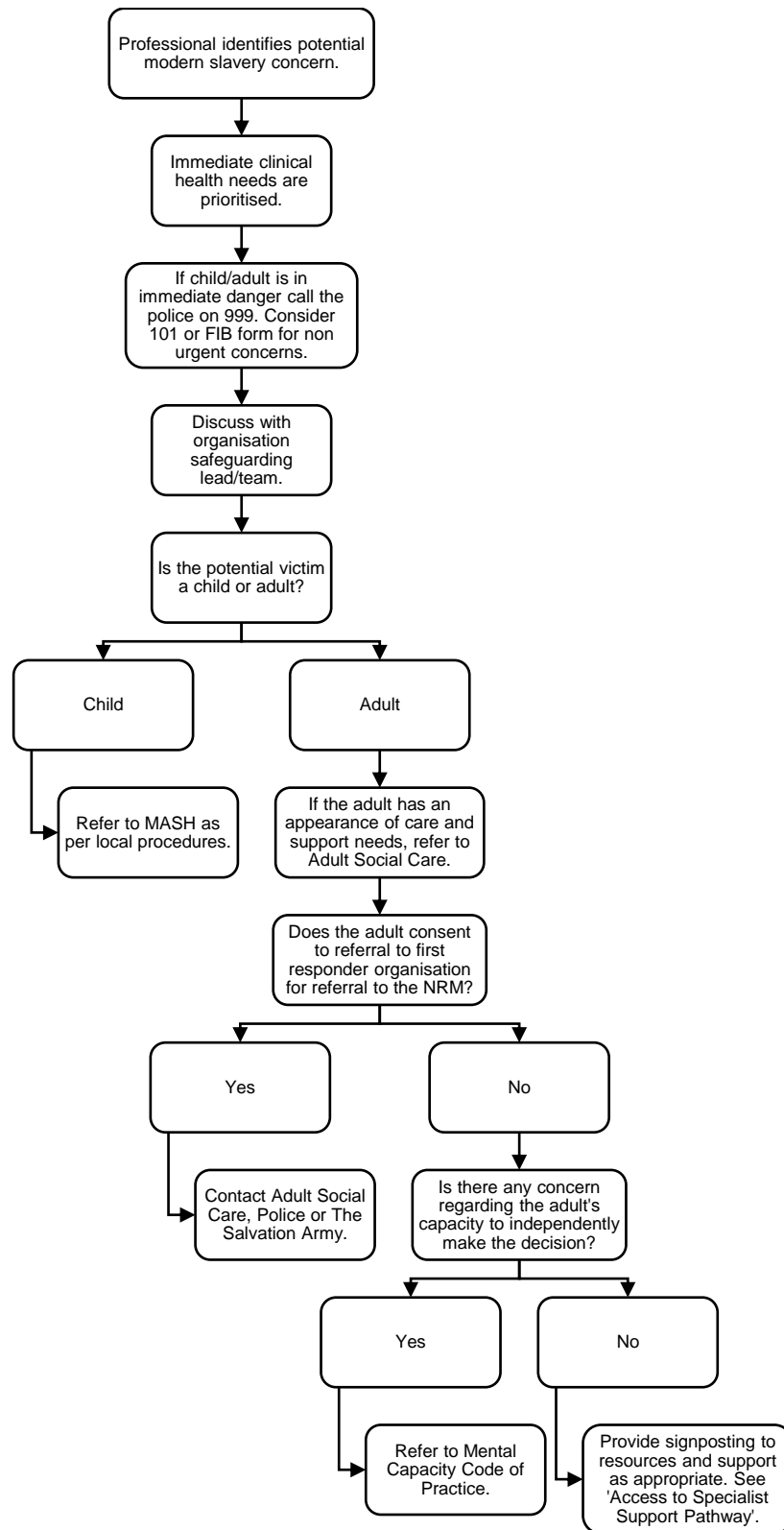
4.6. Adult Social Care Pathway

This pathway should be followed by staff working in Adult Social Services.



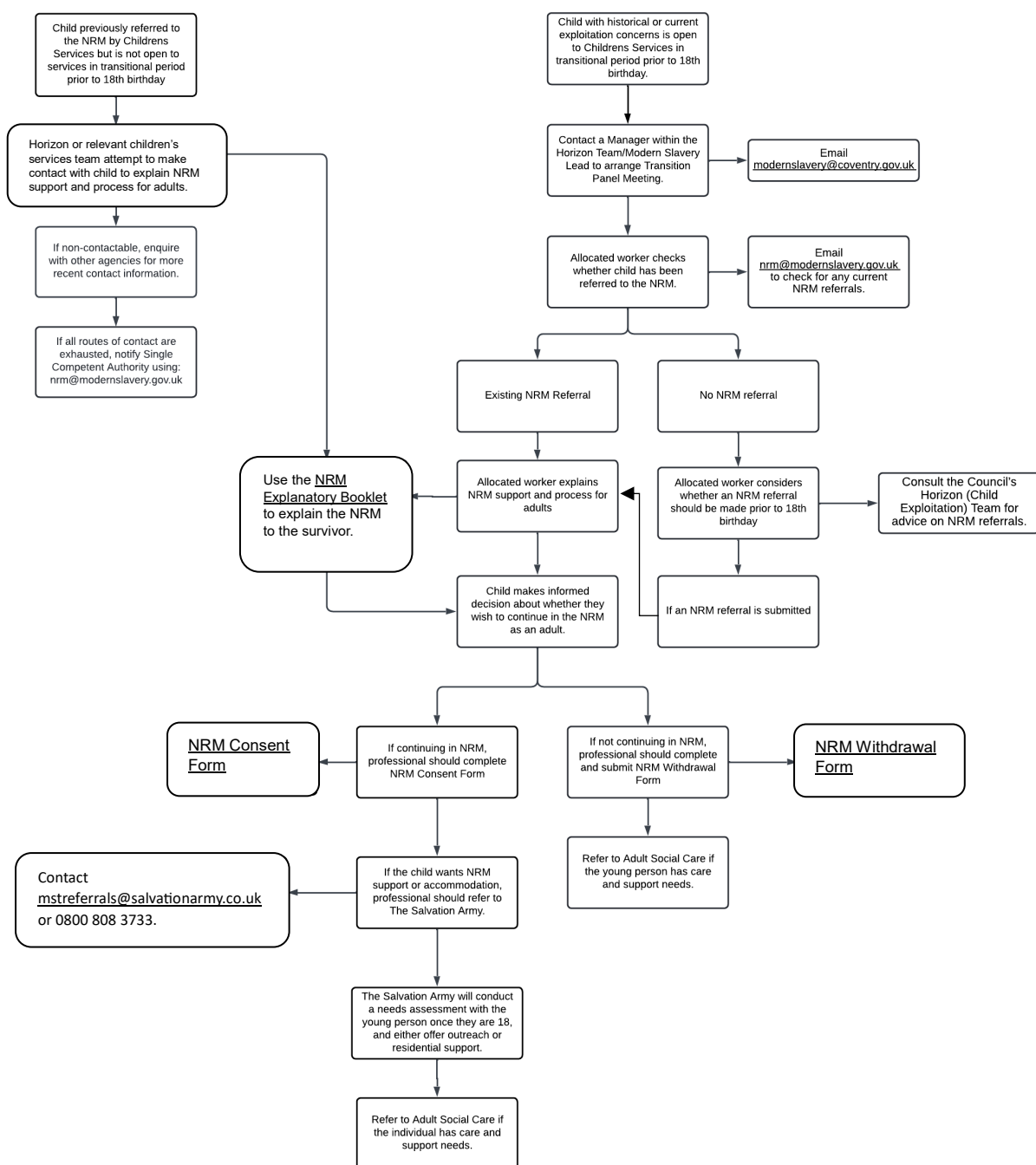
4.7. Health Pathway

This pathway should be used by staff working in health services.



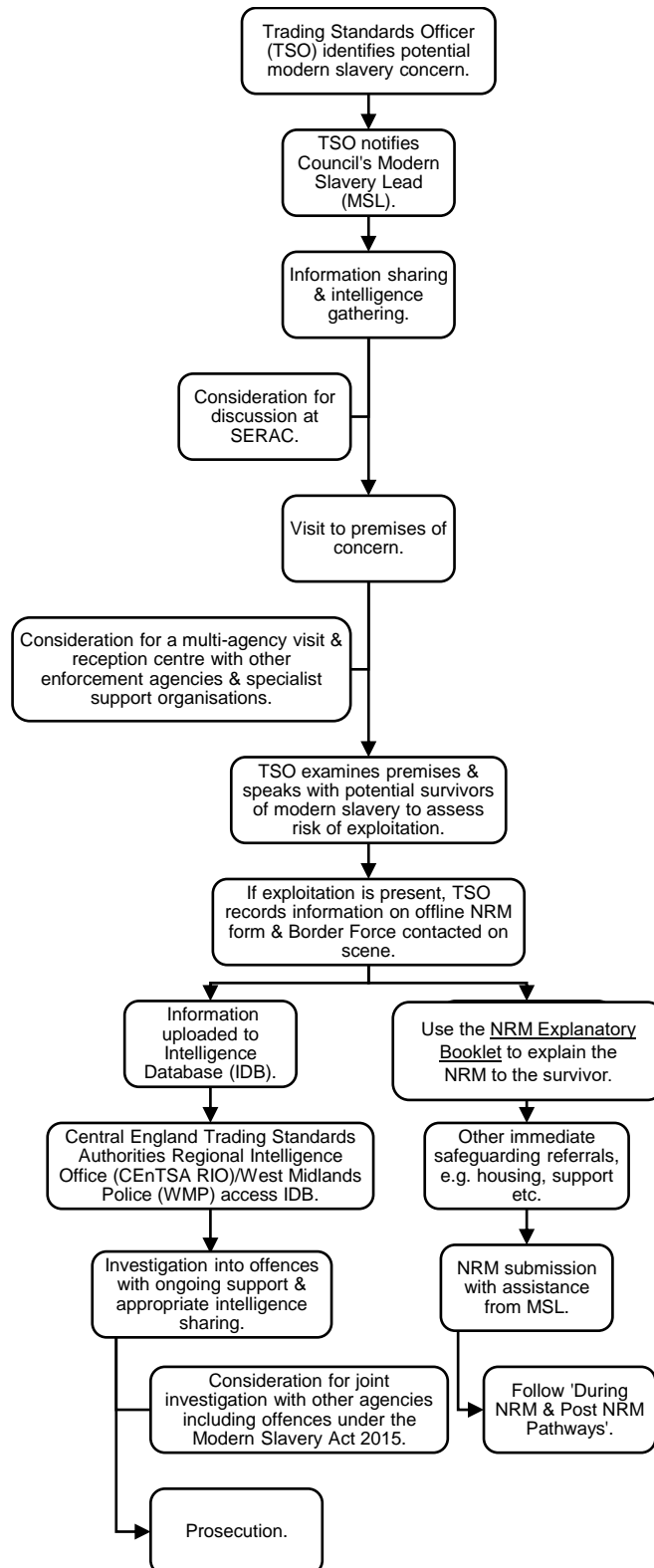
4.8. Transition to Adulthood Pathway

This pathway should be used by Children's Services for cases where a child survivor is turning 18 years old and transitioning to adult services.



4.9. Trading Standards Pathway

This pathway should be used by Trading Standards staff for any modern slavery concern.



5. Monitoring & Evaluation

The Coventry Modern Slavery Partnership will meet on a quarterly basis to review progress against the 4 P Strategy and Pathways. The Coventry Modern Slavery Partnership is a sub-group of the Harm and Abuse Reduction Partnership (HARP) and will report into the Community Safety Board on a quarterly basis.

The Coventry Modern Slavery Partnership will publish an annual action plan setting out smart objectives with performance indicators to meet the strategic priorities. At the end of each year, the Partnership will produce an annual report to highlight the work completed to fulfil the objectives.

The pathways will be disseminated via training. The Council's Modern Slavery Lead will ensure the pathways are in use via the monitoring of cases of modern slavery. Issues of non-compliance with the pathways will be escalated to the Coventry Modern Slavery Partnership and relevant operational groups as needed.



6. Glossary

- 4 P approach to modern slavery:** The UK Government's strategy which aims to reduce the prevalence of modern slavery in the UK by prioritising four components: prosecuting and disrupting individuals and groups responsible for modern slavery (Pursue); preventing people from engaging in modern slavery crime (Prevent); strengthening safeguards against modern slavery by protecting vulnerable people from exploitation and increasing awareness and resilience against this crime (Protect); and reducing the harm caused by modern slavery through improved survivor identification and enhanced support and protection (Prepare). 5
- Abduction:** the act of making a person go somewhere with you using pressure, threats or violence. 8
- Bad faith:** An individual may be considered to have claimed to be a survivor of modern slavery in bad faith where they, or someone acting on their behalf, have knowingly made a dishonest statement in relation to being a survivor of modern slavery. 9
- Best practice:** professional procedures that are accepted as being most effective. 5
- Coercion:** the use of force or intimidation to obtain compliance. 8
- Deception:** the act of causing someone to accept as true or valid what is false or invalid. 8
- Duty to Notify (DtN):** is the duty placed on public authorities in England and Wales by section 52 of the Modern Slavery Act 2015 to notify the Secretary of State when encountering a potential survivor of Modern Slavery. In practice, this is discharged by informing the Home Office. 8
- European Convention on Human Rights:** The Convention protects the right to: life, freedom and security, respect for private and family life, freedom of expression, freedom of thought, conscience and religion, vote in and stand for election, a fair trial in civil and criminal matters, property and peaceful enjoyment of possessions. The Convention prohibits: the death penalty, torture or inhuman or degrading treatment or punishment, slavery and forced labour, arbitrary and unlawful detention, discrimination in the enjoyment of the rights and freedoms secured by the Convention, deportation of a state's own nationals or denying them entry and the collective deportation of foreigners. 10
- Exploitation:** Exploitation occurs when an exploiter uses means of control such as the threat or use of force, coercion, abduction, fraud, deception, or an abuse of power or vulnerability to use another person for personal, financial, or commercial



gain. Exploitation may include sexual exploitation, forced labour, domestic servitude, forced criminality, slavery, financial exploitation, or removal of organs. 5

First responders: referrals to the NRM can only be made by authorised agencies known as First Responders. First Responders are responsible for identifying potential survivors, gathering information and referring them to the NRM or, in the case of adults, notifying the Home Office if someone does not consent to being referred. 8

Fraud: is any activity that relies on deception in order to achieve a gain. Fraud becomes a crime when it is a knowing misrepresentation of the truth. 8

Gender specific needs: survivors may need access to single sex support and accommodation due to previous trauma associated with a particular gender. 10

Harm and Abuse Reduction Partnership (HARP): HARP brings together agencies that work with survivors of crime to better understand who in the city is being harmed and how services can work together to improve services and decrease the risk of abuse. 33

Holistic support: support which treats the whole of someone and not just a part. 17

Human trafficking: the recruitment, transportation, transfer, harbouring or receipt of people through force, fraud or deception, with the aim of exploiting them for profit. 8

Immigration Enforcement Competent Authority ('IECA'): is one of the competent authorities that is responsible for making Reasonable Grounds decisions and Conclusive Grounds decisions regarding individuals in the following groups: All adult Foreign National Offenders (FNOs) detained in an Immigration Removal Centre. All adult FNOs in prison where a decision to deport has been made. All adult FNOs in prison where a decision has yet to be made on deportation. Non-detained adult FNOs where action to pursue cases towards deportation is taken in the community. All individuals detained in an Immigration Removal Centre (IRC) managed by the National Returns Command (NRC), including those in the Detained Asylum Casework (DAC) process. All individuals in the Third Country Unit (TCU)/inadmissible process irrespective of whether detained or non-detained.

Independent Child Trafficking Guardians (ICTGs): The ICTG service provides somebody who can speak up on behalf of, and act in the best interests of, the child. The ICTG service model provides two discrete services to children who have been trafficked; ICTG Direct Worker to support children for whom there is no one with parental responsibility for them in the UK and ICTG Regional Practice Co-ordinator whose role is to focus on children who do have a figure with parental responsibility for them in the UK. 8



Lived Experience Consultants: A lived experience consultant is skilled with the ability to share wisdom and insights they have gained from walking their particular path in life. They are commissioned to provide input on the impact of an organisation's work on people who have similar experiences to their own. 19

Lived experience: Personal knowledge about the world gained through direct, first-hand involvement in events rather than through representations constructed by other people. 5

Modern Slavery Lead: A role within Coventry City Council with responsibility for developing and implementing the Council's approach to adult exploitation through various operational and strategic responsibilities. 33

Modern slavery statement: Certain commercial organisations must publish an annual statement setting out the steps they take to prevent modern slavery in their business and their supply chains. This is a requirement under section 54 (Transparency in Supply Chains) of the Modern Slavery Act 2015. 9

Modern slavery: an umbrella term which encompasses all forms of slavery, human trafficking, and exploitation. In all forms of modern slavery an exploiter uses means of control such as the threat or use of force, coercion, abduction, fraud, deception, or an abuse of power or vulnerability to exploit another person for personal, financial, or commercial gain. This exploitation may include sexual exploitation, forced labour, domestic servitude, forced criminality, slavery, financial exploitation, or removal of organs. People who are subjected to modern slavery can be children or adults, of any gender, from all backgrounds, countries, and communities. 5

National Referral Mechanism (NRM): refers to the UK's framework for identifying and referring potential survivors of modern slavery and ensuring they receive the appropriate support. Consent is required for an adult to be referred to the NRM. If an adult does not consent to enter the NRM, a DtN referral should be completed using the same online process. Adults in England and Wales who are recognised as a potential survivor of modern slavery through the NRM have access to specialist tailored support for a period of at least 30 days while their case is considered. 8

Perfect survivor: is a myth which dictates that survivors should be weak or vulnerable and involved in a respectable activity at the time of survivorization. 6

Community Safety Board: is a requirement within the Crime & Disorder Act 1998. A number of agencies were given "Responsible Authority" status that places a statutory duty on them to work together and do all they reasonably can to prevent, detect and reduce crime and nuisance and prevent re-offending. These agencies



must work with local businesses and communities to improve the safety of the communities they live and work in. 33

Priority need: Housing authorities have duties to try and prevent or relieve homelessness for all applicants who are eligible for assistance and are homeless or threatened with homelessness, irrespective of whether or not they may have a priority need for accommodation. If a housing authority is unable to prevent an applicant from becoming homeless, or to help them to secure accommodation within the 'relief' stage, they are required to reach a decision as to whether the applicant has a priority need for accommodation. Examples of categories of priority need are pregnancy, dependent children, domestic abuse, physical or mental disability, time in care as a child, risk of violence. 10

Public health: public health contributes to reducing the causes of ill-health and improving people's health and wellbeing through: health protection, and health services. 5

Re-trafficked: Re-trafficking refers to when a survivor of trafficking has been trafficked and/or exploited on more than one occasion. 15

Single Competent Authority (SCA): refers to one of the UK's decision-making bodies that is responsible for making Reasonable Grounds decisions and Conclusive Grounds decisions regarding individuals not in the groups covered by the IECA.

Slavery and Exploitation Risk Assessment Conference (SERAC): The purpose of the SERAC is to establish a forum - where suspected or known cases of exploitation/slavery/trafficking can be discussed, in confidence, with an open exchange of information so that a multi-agency plan of action can be developed. The aim of this is to increase effectiveness and co-operation between agencies to result in better service provision, greater protection for survivors and better outcomes and safeguarding interventions for individuals who have been exploited. 13

Slavery and Trafficking Prevention Orders: STPOs are aimed at those convicted, cautioned, who received a reprimand or final warning in respect of a slavery or human trafficking offence, but can not be put on trial in the usual way because they are not fit to plead/stand trial. The Court may impose a wide range of restrictions on individuals depending on the nature of the case, as long as these are necessary to prevent harm associated with slavery or trafficking offences. The Orders are designed so that law enforcement bodies and the Courts can respond flexibly to the risks posed by an individual of committing future modern slavery offences. 8



Slavery and Trafficking Risk Orders: STROs are aimed at individuals who have not been convicted of a slavery or human trafficking offence but there is a risk of them committing these offences in the future. The Court may impose a wide range of restrictions on individuals depending on the nature of the case, as long as these are necessary to prevent harm associated with slavery or trafficking offences. The Orders are designed so that law enforcement bodies and the Courts can respond flexibly to the risks posed by an individual of committing future modern slavery offences. 8

Social capital: the networks of relationships among people who live and work in a particular society, enabling that society to function effectively. 5

Supply chains: A supply chain is a network of individuals and companies that are involved in creating a product and delivering it to the consumer. 16

Survivor: someone who has been subjected to modern slavery. Often used to describe someone who has left exploitation. Often interchangeable with the term survivor. Some people prefer this term to survivor as it is perceived as a more empowering word. 5

Temporary leave to remain for survivors of slavery or human trafficking: A survivor with a positive conclusive grounds decision and no existing right to remain in the UK is automatically considered for permission to stay. Leave is given based on the survivor needing to receive medical treatment, contribute to a criminal justice process or apply for compensation in the UK. VTS leave does not provide a route to settlement, although longer periods of stay might be considered under the VTS Guidance. 9

The push and pull factors of exploitation: these factors are what increases someone's risk of being targeted by exploiters. Push factors include: war and conflict, lack of job opportunities and lack of support network. Pull factors include: economic and social stability, the promise of a better life, a sense of belonging. 15

Threat to public order: applies when the competent authority is satisfied that the individual is a threat to public order and that disqualification from NRM support is appropriate considering the individual recovery needs of the person. 9

Transition to adulthood: The transition to adulthood is a process that brings childhood to an end and turns the individual into a young adult at the age of 18. This process is characterised by the acquisition of new roles for young people, roles linked to the development of personal autonomy that culminate in their emotional and functional independence. 21



Trauma-informed support: Trauma-informed support acknowledges the widespread impact of trauma on an individual's neurological, biological, psychological and social development. Trauma informed support aims to help the individual to understand paths for recovery, and actively avoid re-traumatisation through multi-agency interventions. 19

UK Independent Anti-Slavery Commissioner: The Commissioner's role is independent from Government and is to 'encourage good practice sharing' amongst all those with a role to play in tackling every aspect of modern slavery and human trafficking in the UK. The Modern Slavery Act also places a duty on public authorities to co-operate with the Commissioner, share data with their office and comply with requests. The legislation is clear that the Commissioner has no responsibility for or powers over individual cases. 8

Survivor: someone who has been subjected to modern slavery. 5

Wider determinants of health: a range of social, economic and environmental factors which impact on people's health. They're also known as social determinants. These factors are influenced by the local, national and international distribution of power and resources which shape the conditions of daily life. They determine the extent to which different individuals have the physical, social and personal resources to: identify and achieve goals, meet their needs, and deal with changes to their circumstances. 15

Glossary Sources:

[Council of Europe – What are our Rights and Liberties](#)

[Department of Health and Social Care \(12.2024\) – Wider Determinants of Health](#)

[Independent Anti-Slavery Commissioner – About](#)

[UK Home Office \(04.2017\) - Guidance on Slavery and Trafficking Prevention Orders and Slavery and Trafficking Risk Orders under Part 2 of the Modern Slavery Act 2015](#)

[UK Home Office \(08.10.2024\) - Modern Slavery: statutory guidance for England and Wales \(under s49 of the Modern Slavery Act 2015\) and non-statutory guidance for Scotland and Northern Ireland](#)

[UK Home Office \(20.10.2024\) – National Referral Mechanism Guidance: Adult \(England and Wales\)](#)

[UK Ministry of Housing, Communities and Local Government \(12.12.2024\) - Homelessness code of guidance for local authorities](#)



Appendix 1. Contributors

This document was developed by the Modern Slavery Protocol Task and Finish Group. The group was chaired by Hebe Lawson, Modern Slavery Lead at Coventry City Council, and comprised of the following member organisations:



Thank you to the following organisations who reviewed this document:
Birmingham City Council

Boroughs of Westminster, Kensington, and Chelsea

Human Trafficking Foundation

Oxford City Council



Appendix 2. Further Reading

[West Midlands Adult Safeguarding Policy & Procedures](#)

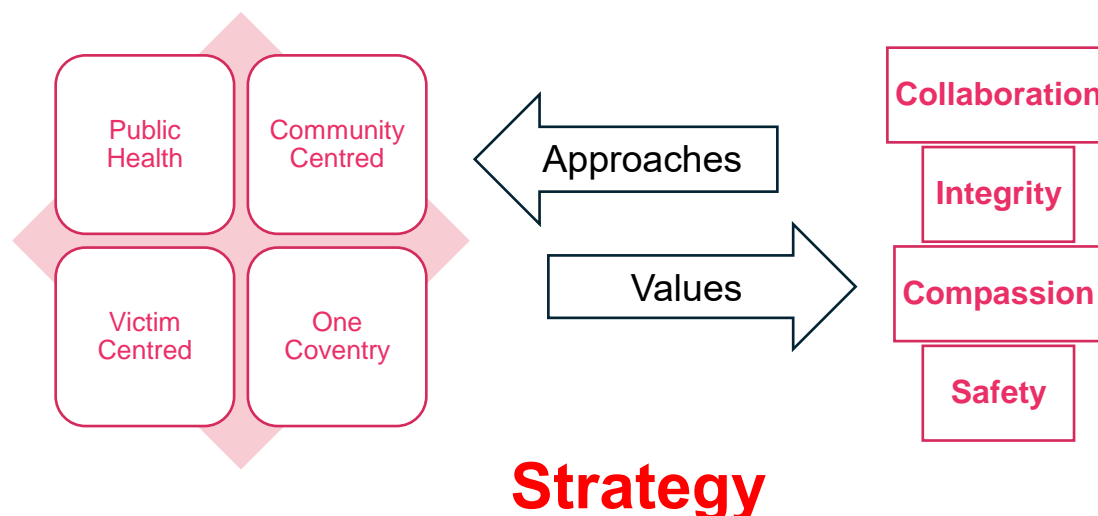
[Mental Capacity Code of Practice](#)



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Coventry Modern Slavery Protocol Summary

This Protocol sets out the strategic vision for the Coventry Modern Slavery Partnership and the operational pathways that support this vision.



Pursue

- Working in Partnership.
- Gathering Intelligence & Sharing Information.
- Using Legislation to Tackle Exploitation.

Prevent

- Improving Life for At-Risk Communities.
- Early Intervention at the First Signs of Vulnerability.
- Implementing Safe Human Resources & Procurement Practices.

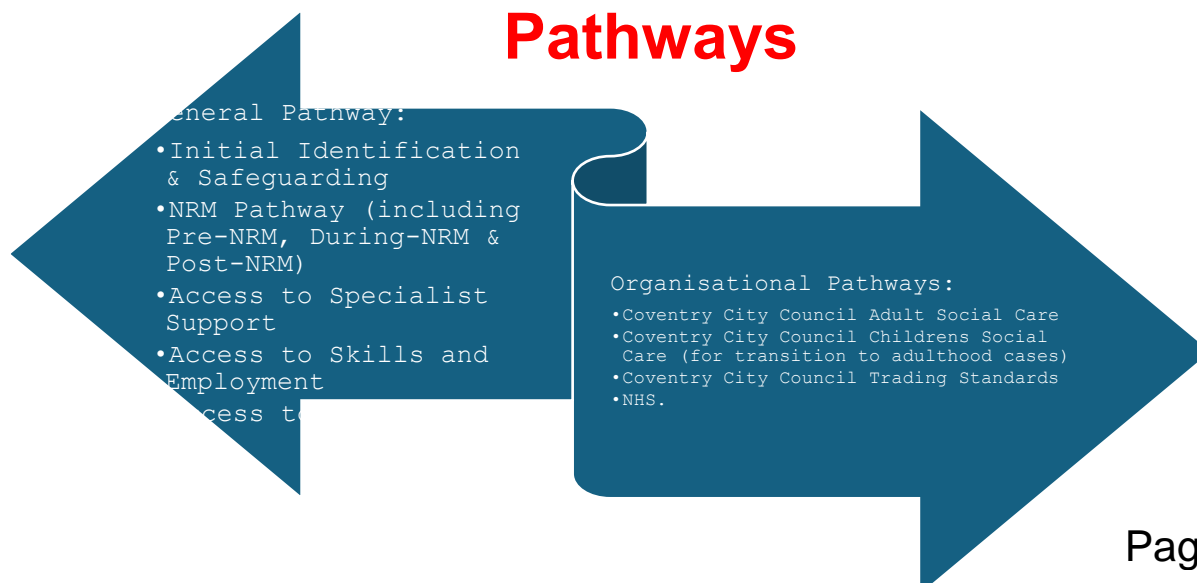
Protect

- Holistic Support for Survivors Throughout their Recovery.
- Multi-Agency Case Management.
- Fulfilling our Legal Responsibilities to Survivors.

Prepare

- Delivering High Quality Training & Awareness Campaigns.
- Encouraging Organisations & Communities to Appoint Modern slavery Ambassadors.
- Amplifying Best Practice & Committing to Continual Improvement.

Pathways



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Equality Impact Assessment

EIA-705805695 - Coventry Protocol for Addressing Adult Modern Slavery

Details

Title	Coventry Protocol for Addressing Adult Modern Slavery
Author	Hebe Lawson (Modern Slavery Lead - Community Safety Officer)
Head of Service	Davina Blackburn (Strategic Lead – Regulation and Communities)
Cabinet Member	Cllr Abdul Khan (Policing and Equalities)
Director	Julie Newman (Law and Governance)

Context and background

EIA carried out on New policy or strategy

Modern slavery is an umbrella term which encompasses all forms of slavery, human trafficking, and exploitation. In all forms of modern slavery an exploiter uses means of control such as the threat or use of force, coercion, abduction, fraud, deception, or an abuse of power or vulnerability to exploit another person for personal, financial, or commercial gain. This exploitation may include sexual exploitation, forced labour, domestic servitude, forced criminality, slavery, financial exploitation, or removal of organs. People who are subjected to modern slavery can be children or adults, of any gender, from all backgrounds, countries, and communities. To learn more about modern slavery, please visit our webpages.

The Council has a legal responsibility to address modern slavery under the Modern Slavery Act 2015, and the Modern Slavery: Statutory Guidance for England and Wales (under s49 of the Modern Slavery Act 2015). The Coventry Protocol for Addressing Adult Modern Slavery (The Protocol) is the first document to formalise the city's operational and strategic response to adult exploitation. Modern slavery and exploitation are key priorities in the Coventry Community Safety Partnership Plan 2025-2028 and our modern slavery approach is coordinated through various subgroups

within the Community Safety Partnership. The Coventry Modern Slavery Partnership is our local strategic meeting that governs the city's work in this area through the delivery of the 4P strategic plan outlined in the Protocol. The Slavery & Exploitation Risk Assessment Conference (SERAC) is our local operational meeting which ensures appropriate case management and oversees the implementation of the pathways outlined in the Protocol.

Background

The Protocol sets out the strategic vision for the Coventry Modern Slavery Partnership, the city's multi-agency forum tasked with determining and implementing the strategic response to adult exploitation. The Protocol also presents the operational pathways to guide frontline professionals through the practicalities of modern slavery case management.

The Protocol has the following objectives:

- To present Coventry Modern Slavery Partnership's local strategic approach to modern slavery via the pursue, prevent, protect, prepare approach as set out by the central government.
- To present the operational processes for responding to modern slavery in Coventry via the creation of survivor support pathways. The pathways are diverse and aim to guide staff through every aspect of case management. Some pathways are general for any professional to use, others have been created by and for priority teams (e.g. Adult Social Care, NHS, and Trading Standards).
- To establish the ongoing monitoring and evaluation mechanisms for the strategy and pathways.

The Protocol was developed between October 2023 – November 2024 by the Coventry Modern Slavery Protocol Task and Finish Group, chaired by the Council's Modern Slavery Lead. The group was formed of several Council departments and over 30 partner organisations. The Protocol underwent consultation with over 150 professionals as well as a lived experience advisory panel formed of consultants with personal experience of modern slavery in early 2025.

Stakeholders

The Protocol will be implemented and monitored by the Coventry Modern Slavery Partnership, the members of which include: Adavu, Coventry City Council, Black Country Womens Aid, British Red Cross, Coventry Asylum and Refugee Action Group, Central England Law Centre, CGL, Citizen Housing, Citizens Advice Bureau, Coventry Haven Women's Aid, NHS, Coventry Refugee & Migrant Centre, Department for Work and Pensions, Embrace, Environment Agency, Foleshill Women's Training, Gangmasters Labour Abuse Authority, Home Office, Hope at Home, Human Trafficking Foundation, Joining Communities Together, Kairos Women Working Together, Medaille Trust, Migrant Help, Office of the Police and Crime Commissioner, Panahghar, Probation, Serco, Sophie Hayes Foundation, Staffline, St Francis Employability, St Giles, The Salvation Army, Turnaround, West Midlands Police, West Midlands Anti Slavery Network. West Midlands Fire Service.

Responsibility

Coventry Modern Slavery Partnership, chaired by the Council's Modern Slavery Lead.

Consideration of impact

Baseline data and information

In 2024, there were 167 cases reported to the Coventry City Council Modern Slavery Database. 30% of cases related to labour exploitation, 28% related to criminal exploitation, 22% related to sexual exploitation, 4% related to domestic servitude, 4% related to financial exploitation. 48% of cases related to male survivors, 27% of cases related to female survivors. The nationality of survivors is as follows: British = 20%, Afghan = 5%, Eritrean = 5%, Iraqi = 5%, Vietnamese = 5%, Sudanese = 4%, Indian = 2%, Sierra Leonean = 2%, Albanian = 1%, Nigerian = 1%.

Nationally, 19,125 potential victims of modern slavery were referred to the Home Office in 2024, representing a 13% increase compared to the preceding year (16,990). The number of referrals made in this year is the highest in a year since the NRM began, overtaking the record from the previous year. The most common nationalities referred this year were UK (23%; 4,441), Albanian (13%; 2,492) and Vietnamese (11%; 2,153) (Home Office 2025). There is no typical victim of slavery – victims can be men, women and children of all ages, ethnicities and nationalities and cut across the population. It is more prevalent amongst the most vulnerable, and within minority or socially excluded groups.

Marmot Principles

- | |
|--|
| 3. Ensure a healthy standard of living for all |
| 4. Create fair employment and good work |
| 5. Create and develop healthy and sustainable places and communities |
| 6. Strengthen the role and impact of ill health provision |

Protected groups

Age 0-18

Positive impact - We know that modern slavery affects young adults, particularly during their transitional period to adulthood. In 2024, 10% of all cases added to the adult modern slavery database related to survivors of exploitation aged between 0-18. Whilst the Protocol is focused on addressing adult exploitation, so is not meant to influence work within the child exploitation space, it includes a transition to adulthood operational pathway to ensure that exploited children are provided with appropriate support during their transition to adulthood at age 18.

Age 19-64

Positive impact - In 2024, 40% of all cases added to the modern slavery database related to survivors of exploitation aged between 19-64. This age group is the largest age group affected by modern slavery in Coventry. The Protocol contains various operational pathways to improve the response to all cases of modern slavery, these include: Initial Identification & Safeguarding, NRM Pathway (including Pre-NRM, During-NRM & Post-NRM), Access to Specialist Support, Access to Skills and Employment, Access to Housing. The Protocol also includes organisational pathways for Coventry City Council Adult Social Care, Children's Social Care (for transition to adulthood cases), Trading Standards and the NHS. The Protocol also includes strategic objectives to work in partnership, gather intelligence & share information, use legislation to tackle exploitation, improve life for at-risk communities, intervene early at the first signs of vulnerability, implement safe human resources & procurement practices, provide holistic support for survivors throughout their recovery, use multi-agency case management, fulfil our legal responsibilities to survivors, deliver high quality training & awareness campaigns, encourage organisations & communities to appoint modern slavery ambassadors, amplify best practice & commit to continual improvement.

Age 65+

Positive impact - In 2024, 2% of all cases added to the modern slavery database related to survivors of exploitation aged over 65 years old. The Protocol contains various operational pathways to improve the response to all cases of modern slavery, these include: Initial Identification & Safeguarding, NRM Pathway (including Pre-NRM, During-NRM & Post-NRM), Access to Specialist Support, Access to Skills and Employment, Access to Housing. The Protocol also includes organisational pathways for Coventry City Council Adult Social Care, Children's Social Care (for transition to adulthood cases), Trading Standards and the NHS. The Protocol also includes strategic objectives to work in partnership, gather intelligence & share information, use legislation to tackle exploitation, improve life for at-risk communities, intervene early at the first signs of vulnerability, implement safe human resources & procurement practices, provide holistic support for survivors throughout their recovery, use multi-agency case management, fulfil our legal responsibilities to survivors, deliver high quality training & awareness campaigns, encourage organisations & communities to appoint modern slavery ambassadors, amplify best practice & commit to continual improvement.

Disability

Positive impact - In 2024, 16% of all cases added to the modern slavery database related to survivors of exploitation with known physical or mental health problems. The Protocol contains various operational pathways to improve the response to all cases of modern slavery, these include: Initial Identification & Safeguarding, NRM Pathway (including Pre-NRM, During-NRM & Post-NRM), Access to Specialist Support, Access to Skills and Employment, Access to Housing. The Protocol also includes organisational pathways for Coventry City Council Adult Social Care, Children's Social Care (for transition to adulthood cases), Trading Standards and the NHS. The Protocol also includes strategic objectives to work in partnership, gather intelligence & share information, use legislation to tackle exploitation, improve life for at-risk communities, intervene early at the first signs of vulnerability, implement safe human resources & procurement practices, provide holistic support for survivors throughout their recovery, use multi-agency case management, fulfil our legal responsibilities to survivors, deliver high quality training & awareness campaigns, encourage organisations & communities to appoint modern slavery ambassadors, amplify best practice & commit to continual improvement.

**Gender
reassignment**

Positive impact - The Protocol contains various operational pathways to improve the response to all cases of modern slavery, these include: Initial Identification & Safeguarding, NRM Pathway (including Pre-NRM, During-NRM & Post-NRM), Access to Specialist Support, Access to Skills and Employment, Access to Housing. The Protocol also includes organisational pathways for Coventry City Council Adult Social Care, Children's Social Care (for transition to adulthood cases), Trading Standards and the NHS. The Protocol also includes strategic objectives to work in partnership, gather intelligence & share information, use legislation to tackle exploitation, improve life for at-risk communities, intervene early at the first signs of vulnerability, implement safe human resources & procurement practices, provide holistic support for survivors throughout their recovery, use multi-agency case management, fulfil our legal responsibilities to survivors, deliver high quality training & awareness campaigns, encourage organisations & communities to appoint modern slavery ambassadors, amplify best practice & commit to continual improvement.

**Pregnancy and
maternity**

Positive impact - In 2024, 1% of all cases added to the modern slavery database related to pregnant survivors of exploitation. The Protocol contains various operational pathways to improve the response to all cases of modern slavery, these include: Initial Identification & Safeguarding, NRM Pathway (including Pre-NRM, During-NRM & Post-NRM), Access to Specialist Support, Access to Skills and Employment, Access to Housing. The Protocol also includes organisational pathways for Coventry City Council Adult Social Care, Children's Social Care (for transition to adulthood cases), Trading Standards and the NHS. The Protocol also includes strategic objectives to work in partnership, gather intelligence & share information, use legislation to tackle exploitation, improve life for at-risk communities, intervene early at the first signs of vulnerability, implement safe human resources & procurement practices, provide holistic support for survivors throughout their recovery, use multi-agency case management, fulfil our legal responsibilities to survivors, deliver high quality training & awareness campaigns, encourage organisations & communities to appoint modern slavery ambassadors, amplify best practice & commit to continual improvement.

Race

Positive impact - Survivors of exploitation are from many different races and countries of origin. In 2024, 34% of all cases added to the modern slavery database related to non-British survivors of exploitation. The Protocol contains various operational pathways to improve the response to all cases of modern slavery, these include: Initial Identification & Safeguarding, NRM Pathway (including Pre-NRM, During-NRM & Post-NRM), Access to Specialist Support, Access to Skills and Employment, Access to Housing. The Protocol also includes organisational pathways for Coventry City Council Adult Social Care, Children's Social Care (for transition to adulthood cases), Trading Standards and the NHS. The Protocol also includes strategic objectives to work in partnership, gather intelligence & share information, use legislation to tackle exploitation, improve life for at-risk communities, intervene early at the first signs of vulnerability, implement safe human resources & procurement practices, provide holistic support for survivors throughout their recovery, use multi-agency case management, fulfil our legal responsibilities to survivors, deliver high quality training & awareness campaigns, encourage organisations & communities to appoint modern slavery ambassadors, amplify best practice & commit to continual improvement.

Religion and belief

Positive impact - The Protocol contains various operational pathways to improve the response to all cases of modern slavery, these include: Initial Identification & Safeguarding, NRM Pathway (including Pre-NRM, During-NRM & Post-NRM), Access to Specialist Support, Access to Skills and Employment, Access to Housing. The Protocol also includes organisational pathways for Coventry City Council Adult Social Care, Children's Social Care (for transition to adulthood cases), Trading Standards and the NHS. The Protocol also includes strategic objectives to work in partnership, gather intelligence & share information, use legislation to tackle exploitation, improve life for at-risk communities, intervene early at the first signs of vulnerability, implement safe human resources & procurement practices, provide holistic support for survivors throughout their recovery, use multi-agency case management, fulfil our legal responsibilities to survivors, deliver high quality training & awareness campaigns, encourage organisations & communities to appoint modern slavery ambassadors, amplify best practice & commit to continual improvement.

Sex

Positive impact - In 2024, 27% of all cases added to the modern slavery database related to female survivors of exploitation. In 2024, 48% of all cases added to the modern slavery database related to male survivors of exploitation. The Protocol contains various operational pathways to improve the response to all cases of modern slavery, these include: Initial Identification & Safeguarding, NRM Pathway (including Pre-NRM, During-NRM & Post-NRM), Access to Specialist Support, Access to Skills and Employment, Access to Housing. The Protocol also includes organisational pathways for Coventry City Council Adult Social Care, Children's Social Care (for transition to adulthood cases), Trading Standards and the NHS. The Protocol also includes strategic objectives to work in partnership, gather intelligence & share information, use legislation to tackle exploitation, improve life for at-risk communities, intervene early at the first signs of vulnerability, implement safe human resources & procurement practices, provide holistic support for survivors throughout their recovery, use multi-agency case management, fulfil our legal responsibilities to survivors, deliver high quality training & awareness campaigns, encourage organisations & communities to appoint modern slavery ambassadors, amplify best practice & commit to continual improvement.

Sexual orientation

Positive impact - The Protocol contains various operational pathways to improve the response to all cases of modern slavery, these include: Initial Identification & Safeguarding, NRM Pathway (including Pre-NRM, During-NRM & Post-NRM), Access to Specialist Support, Access to Skills and Employment, Access to Housing. The Protocol also includes organisational pathways for Coventry City Council Adult Social Care, Children's Social Care (for transition to adulthood cases), Trading Standards and the NHS. The Protocol also includes strategic objectives to work in partnership, gather intelligence & share information, use legislation to tackle exploitation, improve life for at-risk communities, intervene early at the first signs of vulnerability, implement safe human resources & procurement practices, provide holistic support for survivors throughout their recovery, use multi-agency case management, fulfil our legal responsibilities to survivors, deliver high quality training & awareness campaigns, encourage organisations & communities to appoint modern slavery ambassadors, amplify best practice & commit to continual improvement.

Adopted groups

Care experienced

Positive impact - In 2024 17% of cases referred to the Council's modern slavery database related to care experienced adults. The Protocol contains various operational pathways to improve the response to all cases of modern slavery, these include: Initial Identification & Safeguarding, NRM Pathway (including Pre-NRM, During-NRM & Post-NRM), Access to Specialist Support, Access to Skills and Employment, Access to Housing. The Protocol also includes organisational pathways for Coventry City Council Adult Social Care, Children's Social Care (for transition to adulthood cases), Trading Standards and the NHS. The Protocol also includes strategic objectives to work in partnership, gather intelligence & share information, use legislation to tackle exploitation, improve life for at-risk communities, intervene early at the first signs of vulnerability, implement safe human resources & procurement practices, provide holistic support for survivors throughout their recovery, use multi-agency case management, fulfil our legal responsibilities to survivors, deliver high quality training & awareness campaigns, encourage organisations & communities to appoint modern slavery ambassadors, amplify best practice & commit to continual improvement.

Armed forces

Positive impact - The Protocol contains various operational pathways to improve the response to all cases of modern slavery, these include: Initial Identification & Safeguarding, NRM Pathway (including Pre-NRM, During-NRM & Post-NRM), Access to Specialist Support, Access to Skills and Employment, Access to Housing. The Protocol also includes organisational pathways for Coventry City Council Adult Social Care, Children's Social Care (for transition to adulthood cases), Trading Standards and the NHS. The Protocol also includes strategic objectives to work in partnership, gather intelligence & share information, use legislation to tackle exploitation, improve life for at-risk communities, intervene early at the first signs of vulnerability, implement safe human resources & procurement practices, provide holistic support for survivors throughout their recovery, use multi-agency case management, fulfil our legal responsibilities to survivors, deliver high quality training & awareness campaigns, encourage organisations & communities to appoint modern slavery ambassadors, amplify best practice & commit to continual improvement.

Socio economic groups

Positive impact - Poverty, limited opportunities at home, lack of education, unstable social and political conditions, economic imbalances, and war are some of the key drivers that contribute to vulnerability to becoming victims of Modern Slavery. In addition, victims can often face more than one type of abuse and exploitation. The Protocol contains various operational pathways to improve the response to all cases of modern slavery, these include: Initial Identification & Safeguarding, NRM Pathway (including Pre-NRM, During-NRM & Post-NRM), Access to Specialist Support, Access to Skills and Employment, Access to Housing. The Protocol also includes organisational pathways for Coventry City Council Adult Social Care, Children's Social Care (for transition to adulthood cases), Trading Standards and the NHS. The Protocol also includes strategic objectives to work in partnership, gather intelligence & share information, use legislation to tackle exploitation, improve life for at-risk communities, intervene early at the first signs of vulnerability, implement safe human resources & procurement practices, provide holistic support for survivors throughout their recovery, use multi-agency case management, fulfil our legal responsibilities to survivors, deliver high quality training & awareness campaigns, encourage organisations & communities to appoint modern slavery ambassadors, amplify best practice & commit to continual improvement.

Next steps

Inequality	Action	Owner	Timescale
Monitor and evaluation	The Protocol will be monitored by the Coventry Modern Slavery Partnership on a quarterly basis which will report into the Coventry Community Safety Partnership.		

Impact on Council staff

Will there be an impact? No

Completion statement

**Potential equality
impact**

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Modern Slavery Protocol Task & Finish Group Attendees
Adavu
Black Country Women's Aid
British Red Cross
Change Grow Live
Citizen Housing
Coventry Citizens Advice Bureau
Coventry City Council – Adult Social Care
Coventry City Council – Business Compliance
Coventry City Council – Community Safety
Coventry City Council - Food Health & Safety
Coventry City Council - Horizon
Coventry City Council - Housing & Homelessness
Coventry City Council – Housing Enforcement & Property Licensing
Coventry City Council – Legal Services
Coventry City Council – Migration
Coventry City Council – Public Health
Coventry City Council – Safeguarding Adults & Children Boards
Coventry City Council - Safer Housing & Communities
Coventry City Council - Trading Standards
Coventry Haven Women's Aid
Coventry Refugee and Migrant Centre
Department of Work and Pensions
Embrace
Environment Agency
Foleshill Women's Training
Gangmaster & Labour Abuse Authority
Hope at Home
Kairos Women Working Together
Medaille Trust
Migrant Help
NHS – Coventry & Warwickshire Partnership Trust
NHS – Integrated Care Board
NHS – South Warwickshire Foundation Trust
NHS – University Hospital Coventry & Warwickshire
Probation
Serco
Sophie Hayes Foundation
St Francis Employability
St Giles Trust
The Salvation Army
Turnaround West Midlands
West Midlands Anti Slavery Network
West Midlands Fire Service
West Midlands Police - Partnerships
West Midlands Police - Serious Organised Crime & Exploitation

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Modern Slavery Protocol

Strategies and Pathways

Our Progress So Far

In October 2023 we established the Modern Slavery Protocol Task and Finish Group with the aim of creating a city-wide protocol for preventing, identifying, and responding to modern slavery in Coventry. After 8 meetings of exploring effective strategies and pathways, sharing information about services in the city and learning from best practice elsewhere in the country, we are ready to begin writing our own Coventry Protocol.

What's Next

The Protocol will be split into two documents, a strategy and a pathway. We will establish small groups which will develop these for each of our priority areas (Housing, Health, NRM, Migration, Enforcement, Transition to Adulthood, and Support Services).

These strategies and pathways will be combined to create two documents which will cover all aspects of modern slavery work in Coventry. Once finalised, organisations will be asked to sign up to the strategy and pathway, it will be approved by a Lived Experience Advisory Panel, and it will then go through the Council's approval process.

Key information

- Each group has a Group Lead who will coordinate the writing of the pathway and strategy.
- Group membership will be decided in today's meeting.
- Each group will need to submit their completed templates by 2nd of July.



Please provide an overview of how your group will prevent, identify, and respond to modern slavery in Coventry. Please provide answers for each of the 5P Approach below.

1. Pursue: How will you disrupt individuals and groups responsible for modern slavery?

(Consider: effective reporting, information sharing, legal powers, existing capabilities, and new strategies)

2. Prevent: How will you prevent people from being subjected to exploitation or perpetrating modern slavery offences?

(Consider: data gathering, awareness raising, re trafficking/reoffending, enablers & facilitators of exploitation)

3. Protect: How will you protect victims of modern slavery?

(Consider: at risk communities, safeguarding, victim support pathway)

4. Prepare: How will you prepare professionals and the public to better identify and support victims of modern slavery?

(Consider: identification, training, staff support)

5. Partnership: How will you work with other agencies to prevent and respond to modern slavery?

(Consider: information sharing, sharing of best practise, multi-agency case management)

Strategy Template

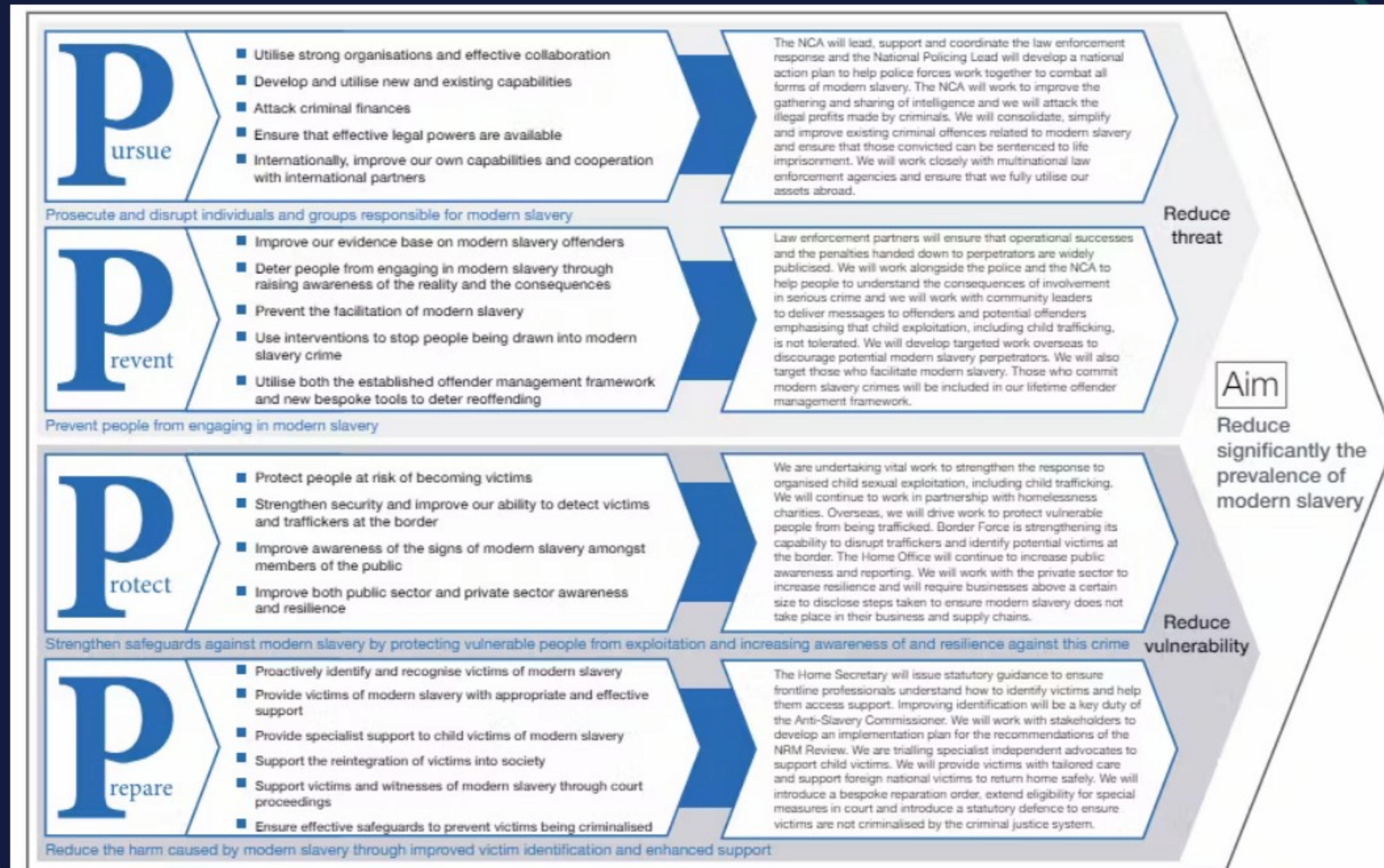
[HTTPS://ASSETS.PUBLISHING.SERVICE.GOV.UK/MEDIA/5A7E460340F0B6230268A4B1/MODERN_S](https://assets.publishing.service.gov.uk/media/5a7e460340f0b6230268a4b1/modern_slavery_strategy.pdf)

The Government's 4 P Strategy

Published in 2014, the Strategy sets out the UK's cross-Government approach to tackling modern slavery. It details the wide-ranging actions that are expected from Government departments, agencies and partners in the UK and, importantly, internationally.

We have added a fifth "P" of Partnership, to recognise the importance of a multi-agency, city-wide response.



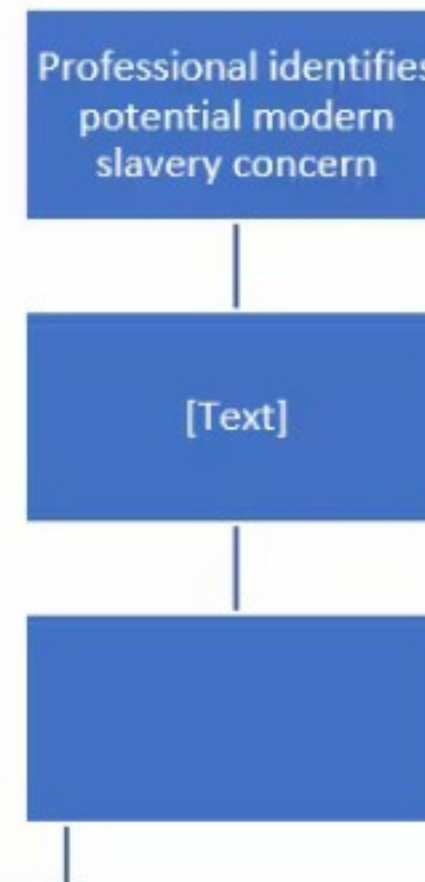


The Government's 4 P Strategy 2014

Please provide a process flowchart of how your group will identify and respond to modern slavery concerns. You need to show how you will provide access to services in your thematic area (Housing/Health/NRM Referral/Migration & NRPF/Enforcement & Disruption/Transition to Adulthood/Support Services).

Please consider the following points:

1. You can use as many boxes as you need, and you may also need more than one flowchart to represent different pathways/entitlements.
2. The Council's Modern Slavery Lead can be contacted for advice about any modern slavery concern. This is accessed through the referral form and can be included in your pathways.



Pathway Template

Useful Resources

- Other Area's Approaches (Warks, Sandwell, Oxfordshire)
- Modern Slavery Statutory Guidance
- LGA Council Guide to Tackling Modern Slavery
- HTF Local Authority Modern Slavery Protocol
- Sector-specific guidance (Homelessness Code of Guidance, West Midlands Adult Safeguarding Policy & Procedures)

Our Coventry Protocol Values

23 responses



HOUSING GROUP

Group Lead: Sophie Hall

- Statutory Housing Provision
- Supported Accommodation
- Housing Associations
- Third-Sector Housing Options
- Housing Enforcement

SUPPORT SERVICES GROUP

Group Lead: Nick Walton

- Modern Slavery Survivor Support Services
- Adult Social Care
- Support Services in related sectors



NRM REFERRALS GROUP

Group Lead: Hebe Lawson

- First Responder Organisations
- Council departments likely to submit NRMs

MIGRATION GROUP

Group Lead: Mandy Sanghera

- Migration Support Services
- Focus on options for No Recourse to Public Funds



HEALTH GROUP

Group Lead: ICB

- GP
- Hospital
- Mental Health
- Adult Social Care

TRANSITION TO ADULthood GROUP

Group Lead: Horizon Team

- Childrens Services
- Adult Social Care
- Violence Reduction Partnership
- Transitional Support Services



ENFORCEMENT GROUP

Group Lead: West Midlands Police

- Police
- Council Regulatory Services
- GLAA
- DWP
- Home Office
- Other Enforcement Partners

What Happens Now

Group Leaders will contact group members to start drafting the strategy and pathway.

You may want to organise a meeting to discuss, you can also create a live document to complete the templates collaboratively.

I will be part of every group to assist and link the groups together. I will also send examples of other area's protocols and best practice guidance to each group lead.

Deadline is 2nd of July



Remember

The strategy is high-level, and should be a summary of your plans.

The pathway is how your sector would approach a case of modern slavery, you can have more than one flowchart if easier and you can have an explainer document or appendices to accompany the flowchart.

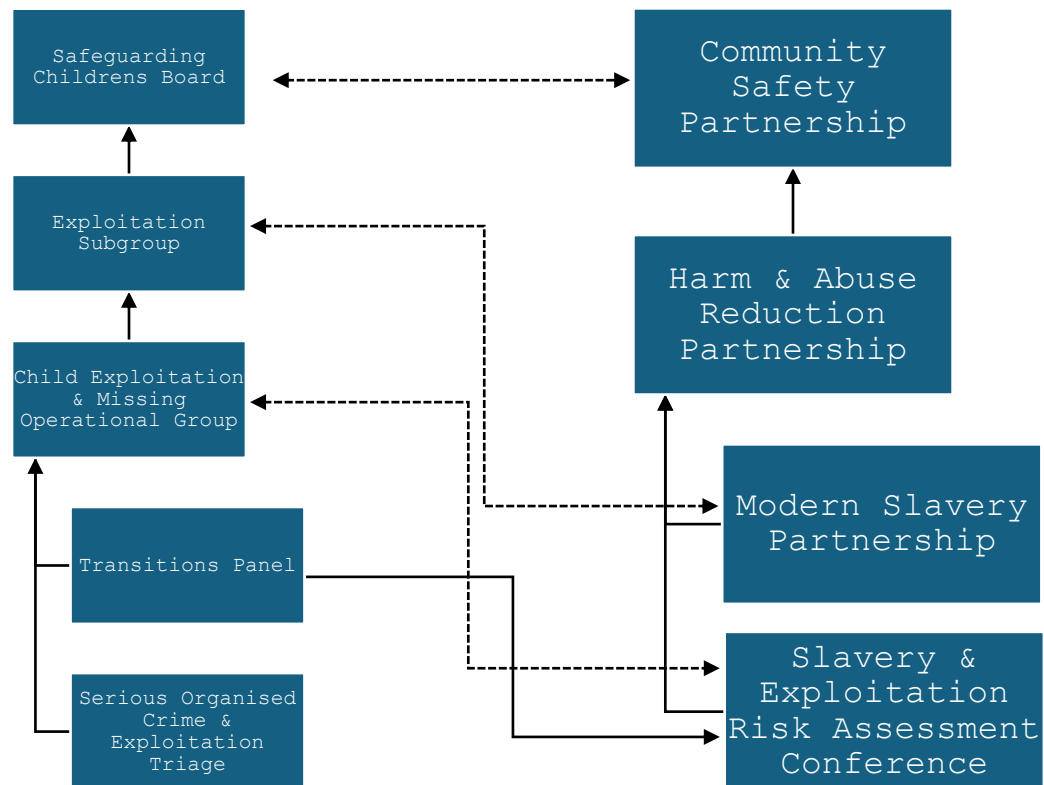
After the 2nd of July, I will combine your strategies and pathways into a city-wide protocol which covers all sectors. There will be opportunities for editing and synchronising with other groups during this stage.

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Modern Slavery & Exploitation Governance Structure

Child Modern Slavery & Exploitation

Adult Modern Slavery & Exploitation



Key

Reporting relationship = —————→

Collaborative relationship = <----->

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Modern Slavery in Coventry



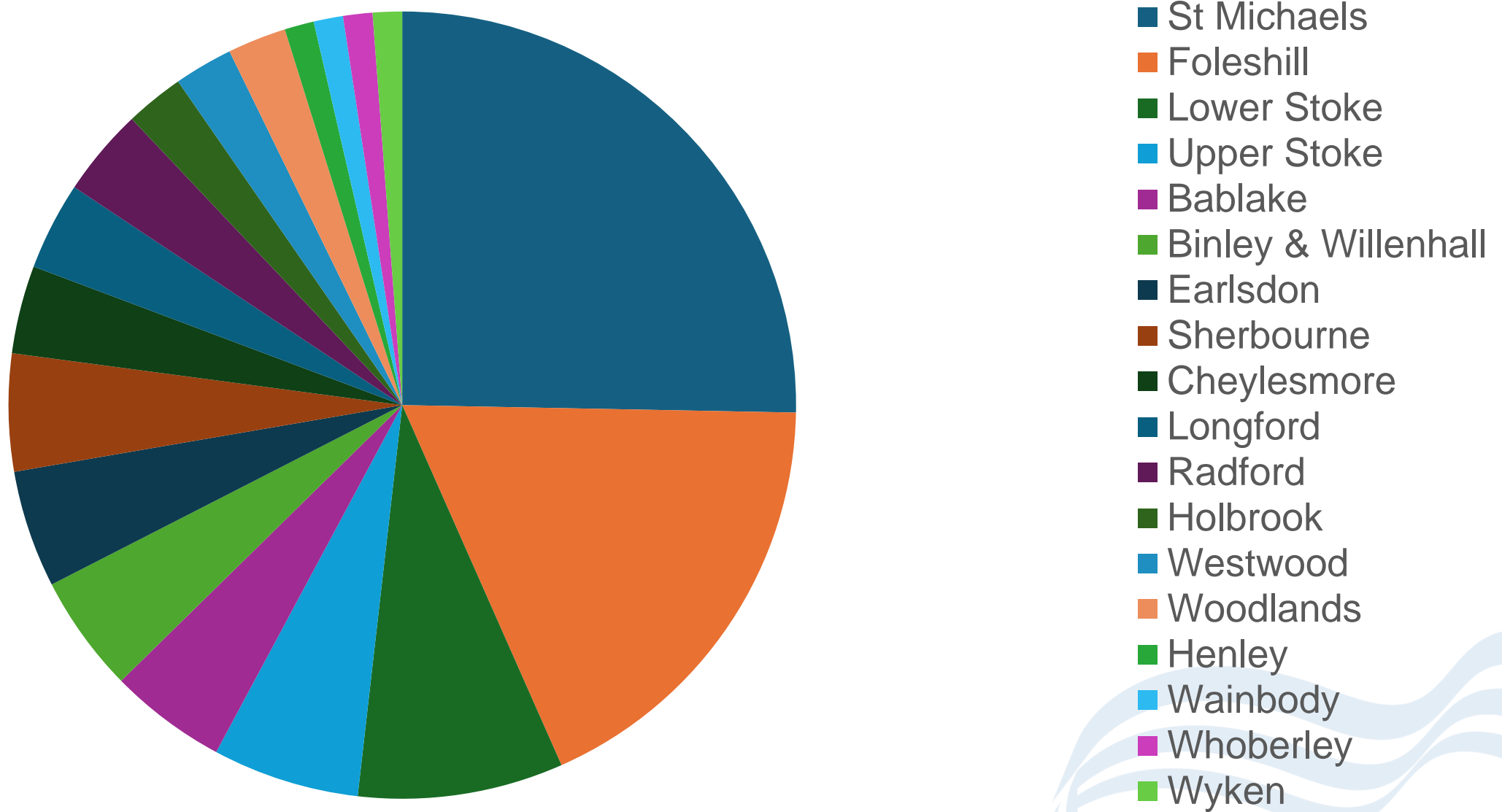
Modern slavery is an umbrella term which encompasses all forms of slavery, human trafficking, and exploitation.

In all forms of modern slavery an exploiter uses means of control such as the threat or use of force, coercion, abduction, fraud, deception, or an abuse of power or vulnerability to exploit another person for personal, financial, or commercial gain.

This exploitation may include sexual exploitation, forced labour, domestic servitude, forced criminality, slavery, financial exploitation, or removal of organs.

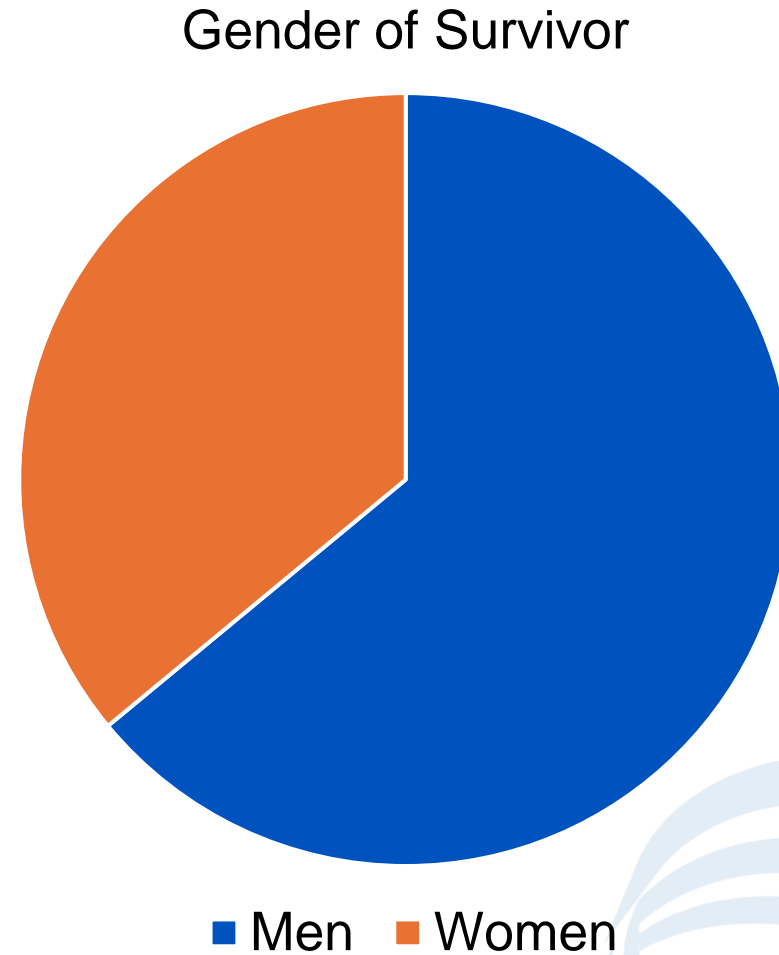
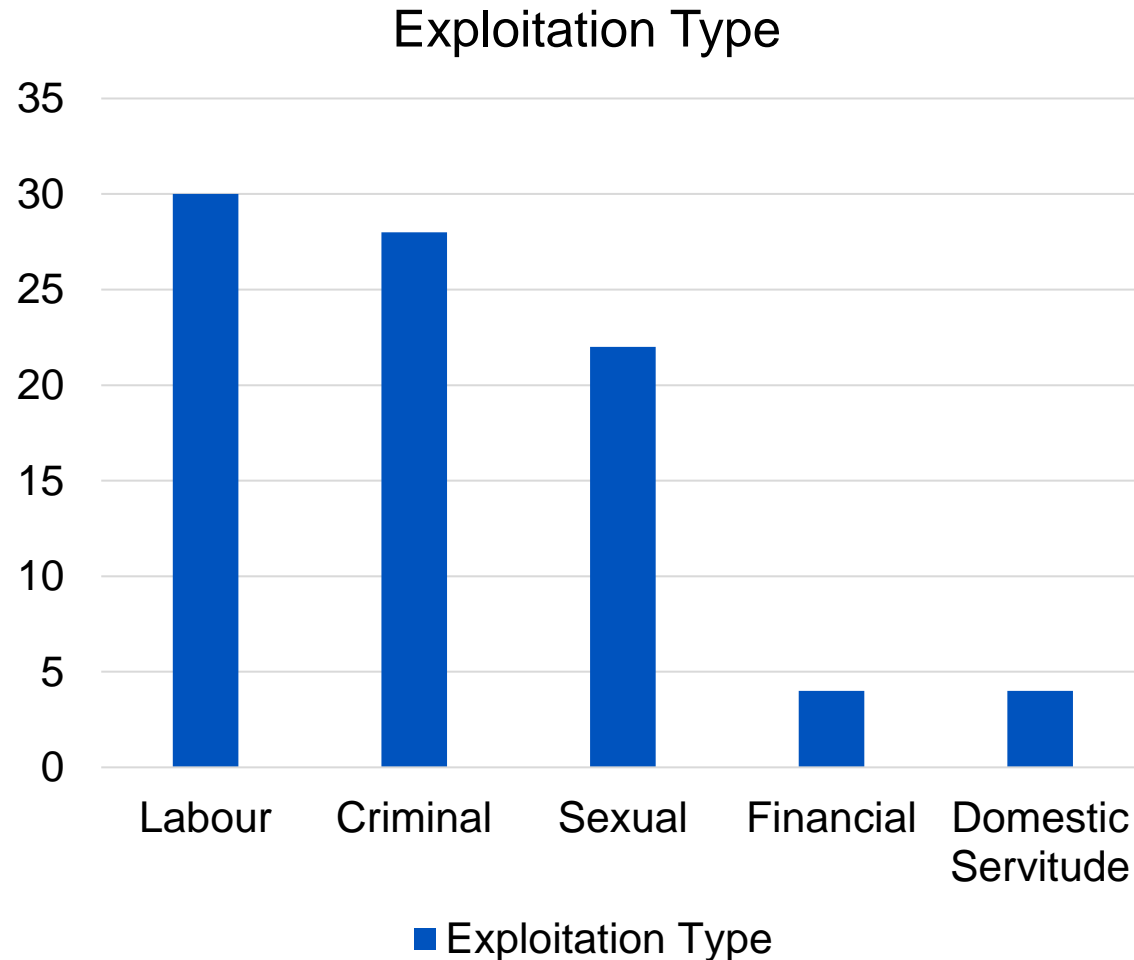
People who are subjected to modern slavery can be children or adults, of any gender, from all backgrounds, countries, and communities.

All Wards are Affected

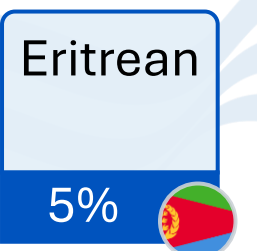


2024 Data Headlines

167 Total Cases.



Survivor Nationality



What to do if you suspect modern slavery?

In an emergency, always call 999.

For concerns relating to children, contact the Multi-Agency Safeguarding Hub on 024 7678 8555.

Report concerns relating to adults on the [Council's Website](#).

For concerns relating to adults with care and support needs refer to Adult Social Care.

Please also report concerns to your Line Manager/Safeguarding Lead.

Practice self-care and speak to your line manager for additional support.

Robust Recruitment & Supply Chain Processes

We implement the following due diligence processes to identify and address risks of modern slavery:

- Conducting risk assessments of suppliers and service providers.
- Including modern slavery clauses in our contracts to ensure compliance.
- Carrying out audits of high-risk suppliers and monitoring their adherence to labour standards.
- Engaging with suppliers to raise awareness and encourage transparency.

We prioritise areas of the highest risk within our supply chains and operations, including construction, social care, and outsourced services. We collaborate with relevant stakeholders to identify and mitigate risks, focusing on safeguarding vulnerable individuals and promoting ethical practices.

In addition to procurement processes, we conduct regular and systematic risk assessments to identify potential modern slavery risks across:

- Direct employment practices
- Procurement and commissioning processes
- Service delivery contracts
- Partnership arrangements

The Council's Modern Slavery and Human Trafficking Statement 2025/26 has been written and will require sign off before it is published.

the co-operative party

CHARTER AGAINST MODERN SLAVERY

Coventry City Council will:

1. Train its corporate procurement team to understand modern slavery through the Chartered Institute of Procurement and Supply's (CIPS) online course on Ethical Procurement and Supply.
2. Require its contractors to comply fully with the Modern Slavery Act 2015, wherever it applies, with contract termination as a potential sanction for non-compliance.
3. Challenge any abnormally low-cost tenders to ensure they do not rely upon the potential contractor practising modern slavery.
4. Highlight to its suppliers that contracted workers are free to join a trade union and are not to be treated unfairly for belonging to one.
5. Publicise its whistle-blowing system for staff to blow the whistle on any suspected examples of modern slavery.
6. Require its tendered contractors to adopt a whistle-blowing policy which enables their staff to blow the whistle on any suspected examples of modern slavery.
7. Review its contractual spending regularly to identify any potential issues with modern slavery.
8. Highlight for its suppliers any risks identified concerning modern slavery and refer them to the relevant agencies to be addressed.
9. Refer for investigation via the National Crime Agency's national referral mechanism any of its contractors identified as a cause for concern regarding modern slavery.
10. Report publicly on the implementation of this policy annually.



Thank you for listening. Questions?



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Public Report Cabinet

**Scrutiny Co-ordination Committee
Cabinet**

**3rd July 2025
8th July 2025**

Name of Cabinet Member:

Cabinet Member for Housing and Communities – Councillor N Akhtar

Director approving submission of the report:

Director of Care, Health and Housing

Ward(s) affected:

All

Title: The Re-commissioning of Housing Related Support Services

Is this a key decision?

Yes - the re-commissioning of the housing related support services for the city has the potential to affect all wards, and the total expenditure over the 6 years (2+2+2) is £14,814,000.

Executive summary:

This report follows extensive engagement with key stakeholders in Coventry and makes recommendations as to the requirements for the commissioned housing related support services, effective from 1st April 2026.

The existing housing related support contracts went live on 1st April 2020, at that point the country had been in a national lockdown due to the Coronavirus pandemic for approximately 1 week. Contract mobilisation at a time of national crisis was challenging however the providers mobilised and started delivering support and services to those in need of housing related support. The existing contracts are due to expire on 31st March 2026.

The housing related support services support the statutory homelessness service in a number of ways. Without the hostel type accommodation that is commissioned, a significant percentage of the occupants would need to be provided with Temporary Accommodation (TA) by the Council. This would result in additional financial pressure on the service. In addition to this a percentage of the floating support provision supports people in hostel type accommodation e.g. Frank Walsh House, The Foyer etc. Any reduction in support to this provision could result in these services being unviable and therefore placing another pressure on the Council's TA numbers and provision.

Since the contracts were previously awarded in 2020 there has been an increase of 95% in the number of households and individuals approaching the Council in housing need. This is particularly the case for families and for individuals who require support for multiple complex needs. This has placed substantial pressure on the housing and homelessness service and its budget over the last few years.

The new provision will support the delivery of the Homelessness and Rough Sleeping Strategy (2025- 2029). The key aim is to ensure that the newly commissioned services are not only focussed on the delivery of services to households who are in a crisis, but that prevention work is fundamental in the delivery of these services.

We are proposing that there will be 5 commissioned Lots instead of the current 4 to deliver housing related support services and specialist accommodation and that, within these, there are specific Lots that address and support the aspirations within the Homelessness and Rough Sleeping Strategy and for specific groups at risk of homelessness. The Lots that we are seeking to commission through this exercise are Adults with Complex Needs, Older Single People (25yrs +), Young People (18-24), Families, and Women with Complex Needs

In terms of how the new Lots will compare with previous Lots there will be some difference, which includes a slight reduction in the number of commissioned bed spaces, and a reconfiguration of the floating support provision. This is because although costs have increased, the budget has remained static so need to ensure that the services are targeted where they will have the greatest impact and supports how we meet our statutory obligations to the residents of Coventry.

Recommendations:

Scrutiny Co-ordination Committee is recommended to consider the content of the report and identify any further recommendations or comments for Cabinet

Cabinet is requested to:

- 1) Consider any recommendations or comments from Scrutiny Co-ordination Committee
- 2) Approve the re-commissioning of Housing Related Support Services.
- 3) Approve the proposed contract structure for the Housing Related Support Services.
- 4) Delegate authority to the Director of Care, Health and Housing to commence the Housing Related Support Services tender process with the new contracts being put in place by April 1st, 2026
- 5) Following the completion of the procurement process, delegate authority to the Director of Care, Health and Housing and the Director of Finance and Corporate Services, following consultation with the Cabinet Member for Housing and Communities, to undertake the necessary due diligence, finalise the terms and conditions and award a contract for a period of up to 6 years to the preferred suppliers.

- 6) Delegate authority to the Director of Care, Health and Housing, following consultation with the Director of Finance and Corporate Services and the Cabinet Member for Housing and Communities, to make variations to the terms of the contracts over the life of the contract term.

List of Appendices included:

None

Background papers:

None

Other useful documents

Homelessness and rough sleeping strategy (2025-2029) [Homelessness and Rough Sleeping Strategy 2025-2029 – Coventry City Council](#)

Homelessness review (2024). [Coventry Homelessness Review 2024 – Coventry City Council](#)

Has it or will it be considered by Scrutiny?

Yes – Scrutiny Co-ordination Committee 3rd July 2025

Has it or will it be considered by any other Council Committee, Advisory Panel or other body?

No

Will this report go to Council?

No

Report title: The Re-commissioning of Housing Related Support Services

1. Context (or background)

- 1.1 Housing is fundamental to the wellbeing of people, their families, and their communities. Decent housing provides a stable base on which people can build their lives and build successful communities. Poor or unsuitable housing or homelessness, however, can have negative impacts on many other areas of personal and community life as well as physical and mental health and wellbeing. If people are experiencing homelessness or do not have decent housing, everything else becomes much more difficult. Supporting people who are facing homelessness and improving housing options, conditions, and neighbourhoods within the city is essential for economic growth, improving outcomes for residents and children including their educational attainment, health and wellbeing, and community cohesion. The commissioned housing related support services aim to support people in housing need and those who are experiencing homelessness. The provision of support for those in housing crisis supports the Council's statutory duty in terms of families and single people who are homeless and provides specialist accommodation options for specific groups facing homelessness.
- 1.2 To identify the specific Lots for the re-commissioning a number of issues were considered and discussed with partners, both regarding the current provision and what could/should be re-commissioned for future years. It was agreed that the priorities would be;
- 1.2.1 To provide support to households who are identified as requiring support and are placed into specific accommodation schemes either managed by or contracted to the Council
 - 1.2.2 To provide specialist support to complex women as this is a clear gap in the current provision. It is included as a separate lot as in 2019 no specific provision for this group was put forward as part of the complex needs lot.
 - 1.2.3 The focus on complex needs is due to this group being the most difficult to accommodate and closest to ending up sleeping rough in the city. Additionally, there are a range of non-commissioned providers who provide accommodation for people with low-medium support needs operating in the city
 - 1.2.4 The provision of accommodation and support for young people in the city is also a priority. Friends and family no longer willing to accommodate people is the biggest reason for homelessness and often impacts on young people without children.
 - 1.2.5 The Complex Needs provision includes a number of different services including some specific beds for rough sleepers, a Hub to provide information and advice to people who are non-priority homeless as well as the Severe Weather Emergency Protocol (SWEP= additional support during periods of extreme weather.)

1.3 The proposals contained within this report support the delivery of the City Councils Homelessness and Rough Sleeping Strategy (2025 - 2029) which focuses on three main themes:

- Early intervention and prevention
- Targeted and crisis support
- Move on and tenancy sustainment

1.4 The proposals contained within this report for a key part of the delivery of this Strategy. In addition, the Council has statutory duties specifically under part 7 of the Housing Act (1996) as amended by the Homelessness Reduction Act (2017), which includes specific duties to secure accommodation for applicants who are homeless, eligible for assistance, have priority need and are not intentionally homeless (the main housing duty).

1.5 As a service we are experiencing a sharp increase in people approaching the statutory homeless service (a 36% increase in approaches from 22/23 to 23/24). This increase has resulted in a significant increase in the number of households in temporary accommodation. The local authority has a statutory duty to provide temporary accommodation for those in housing need who are deemed eligible. The current temporary accommodation provision is split between outsourced providers as well as Council owned and managed services.

1.6 In order to attract the enhanced housing benefit rates for the Council owned temporary accommodation, the provision of care, support and supervision must be in place – this provision is currently delivered via the housing related support contract. Our Supported Temporary Accommodation (STA) provision is provided by the Council for single people and in order to receive enhanced housing benefit rates, housing related support must be provided. As part of the Council's Medium Term Financial Strategy, we have expanded the STA portfolio over the last 12 months to cater for the demand and deliver savings, this relies on commissioned support being delivered into the provision.

1.7 The Housing and Homelessness service are also expanding their TA provision for families through purchasing properties as well as creating a new scheme with Green Square Accord. To attract enhanced housing benefit for these schemes and therefore ensure their overhead costs are met, a support service needs to be provided alongside enhanced housing management costs that are met through Housing Benefit. We need to clearly articulate to the Housing Benefit Service how the support element is funded as this cost cannot be met through housing benefit. This will need to be commissioned support.

1.8 Coventry's latest Homelessness Review (2024) identified a number of key challenges and factors that impact homelessness in the city. Those relevant to this report are:

- **Affordability:** The cost of housing, whether through buying or renting, is rising faster than household incomes, creating a disparity and the Local Housing Allowance (LHA) rates have struggled to keep pace with the rising rents.

- **Health and homelessness:** it is well evidenced that people who are homeless experience worse health outcomes than the rest of the population, this includes both physical health as well as mental health and medical interventions and support for the use of substances.
- **Domestic abuse:** Domestic abuse is a key factor in terms of homelessness within Coventry.
- **Increased demand:** There has been a year-on-year increase in demand for support in regard to homelessness in Coventry particularly from young people, single adults, and single parents with dependent children.
- **Temporary accommodation:** The increased demand for temporary accommodation and length of stay, against the availability of permanent accommodation suggests that the number of households accommodated in temporary accommodation will continue to rise if the supply of affordable housing does not increase.
- **Supply:** The housing needs in terms of the number of households on the housing list in Coventry outpaces the availability of social rented housing, highlighting the gap in supply and demand.
- **Support needs:** The primary support need for those approaching the homelessness service is in relation to Mental Health closely followed by physical health, substance misuse, and domestic abuse.
- **Rough sleeping:** The number of individuals found rough sleeping is on an upward trend, with a notable increase in non-nationals being found.

1.9 The new provision will support us to address some of the key challenges that have been identified and support the delivery of the Homelessness and Rough Sleeping Strategy.

1.10 The key aim is to ensure that the newly commissioned services are not only focussed on the delivery of services to households who are in crisis, but that prevention work is fundamental in the delivery of these services.

1.11 The Council are funding the support provision for each of the contracts with rental payments being met through Housing benefit claims made for the residents.

1.12 The recommended option proposes that there will be five separate Lots commissioned to deliver housing related support and accommodation to target cohorts of service users, including:

- Adults with Complex Needs,
- Older Single People (25yrs +),
- Young People (18-24),
- Families, and
- Women with Complex Needs

1.13 Contract Description:

It is proposed that the contract for Housing Related Support is commissioned in four separate 'Lots' covering each of the five cohorts listed in para 2.9 above.

1.14 Lot 1: Temporary Accommodation Support

This Lot will provide support services for families and single people with the ability for support capacity to be used flexibly within the overall capacity available of 750 hours per week supporting an indicative 150 single people and 100 families.

1.15 Lot 2: Complex Needs Provision (Over 25's)

This Lot will provide support services for individuals aged over 25 with complex needs, including ex-offenders. The support provided includes prevention and crisis support. The service will provide a minimum of 100 units of accommodation along with outreach services for newly settled individuals. The Severe Weather Emergency Protocol (SWEP), and emergency off the street accommodation for rough sleepers are included here.

1.16 Lot 3: Under 25s Provision

This Lot will provide support services and accommodation for individuals aged under 25. Support includes prevention, crisis, and tenancy sustainment support. An under 25s Hub will also be commissioned to support on homelessness and tenancy sustainment. A minimum of 50 units of accommodation will be required (funded via housing benefit) with outreach support being part of the prevention offer.

1.17 Lot 4: Families Provision

This Lot will provide support services to Families related to prevention and tenancy sustainment. Outreach support will also be provided as part of a prevention offer.

1.18 Lot 5: Women with Complex Needs Provision

This Lot will provide support services and accommodation for women. This includes prevention, crisis support and sustainment support. 20-25 units of accommodation (funded via Housing Benefit) as well as outreach support from part of the contract Lot.

1.19 The proposed contracts are for the initial term of 2 years from 2026 to 2028 and potentially extended for two periods of 2 years each to 2032. The contracts aim to provide comprehensive support across various cohorts, addressing the needs of families, single persons, individuals with complex needs, under 25s, and women. The flexible support structure and targeted interventions are designed to reflect fluctuating demands and ensure effective service delivery.

1.20 We will welcome consortium bids, as well as bids where one contractor is the lead provider of the contract, with sub-contractor arrangements in place to deliver the different elements. Regardless of contracting arrangements, it will be a requirement for all parties/organisations who are part of the contract delivery to regularly meet with and

report to the commissioning team as part of quality assurance processes for the suite of contracts.

1.21 The Commissioning & Partnership Lead within the Housing & Homelessness Service will be responsible for the monitoring of the contract. This will include the providers having to,

- Provide weekly, monthly, quarterly, and annual performance data in an agreed format utilised across the different providers.
- Monthly monitoring meetings and quarterly review meetings.
- A minimum of quarterly meetings with residents to secure feedback regarding the provision of the support service they are receiving
- Observation of support delivered
- Support plan, risk assessment and exit interview quality checks on a quarterly basis
- The requirement to produce an annual report
- A clear process for escalation/dispute resolution

2. Options considered and recommended proposal

Option 1 - (recommended option) – Externally commission the required support.

This option is to externally commission through a tender process the housing and homelessness provision described in section 2.9 – 2.15 above, ensuring best use of the budget envelope with a focus not only on crisis support but also on prevention and tenancy sustainment.

The decision to pursue this option reflects the complex and specialist nature of providing good quality floating and accommodation-based support services and the availability of a range of direct access and supported accommodation which already operates across the city by partner organisations.

Option 2 – not recommended - Do not continue to provide housing related support services beyond the end of the current contract

This option is not recommended as the Council has statutory responsibilities to support households who are at risk of becoming or already are homeless.

Failure to continue to provide support, either commissioned or on house would present a budgetary impact on the Council as support is required for households living in temporary accommodation. Additionally, a number of individuals currently living in commissioned supported accommodation would require alternative accommodation that would in many instances be in temporary accommodation provided by the Council.

Option 3 – not recommended -Deliver the services through the establishment of a City Council team employed to deliver the support.

This would mean the Council needs to directly provide many services which are currently delivered by commissioned service providers. This option would see the Council delivering all services including support.

This option is not recommended because the complex and specialist nature of providing good quality floating and accommodation-based support services especially for rough sleepers and ex-offenders is expertise not currently in-house and the availability of a range of direct access and supported accommodation requires expertise that partner organisations are better placed to provide. Additionally, the Council would need to source accommodation units of sufficient volume for three of the service Lots (Lots 2, 3 and 5).

3. Results of consultation undertaken

3.1 The initial overarching principles of each contract specification have been informed by targeted engagement with service users, existing service providers and other relevant stakeholders and groups. Such engagement has included:

- Meetings and discussions with existing service providers to understand both benefits and issues with the existing service provisions.
- Registered Providers.
- The Coventry Homelessness Forum
- Internal partners - Cross directorate expertise within the Council to ensure it is fully reflective and complementary to a range of existing corporate strategies and procurement exercises. Prime examples include the commissioned Drug and Alcohol Support Services and related Strategy and Domestic Abuse commissioned services.
- Existing service users – drawing on feedback through existing service providers and forums

4. Timetable for implementing this decision

Should recommendations be improved, a tender exercise is anticipated to commence in August 2025 with contract mobilisation over October 2025 – April 2026 and with contract commencement April 2026.

5. Comments from Director of Finance and Resources and Director of Law and Governance

5.1. Financial Implications

The budget allocated for the recommissioning of the contract is an annual £2.469 million, and this will be met from the overall core budget allocation for Housing & Homelessness Service. Sufficient flexibility will be built into the contract structure and procurement process to deal with fluctuations and changes in levels of need over the contract term.

5.2. Legal Implications

The Council will conduct the procurement using the most appropriate procedure under the Procurement Act 2023 and/or other applicable procurement legislation for the purposes of procuring the services described in this report. Tender documents will

need to be published in accordance with the Council's Rules for Contract and via the Find-a-Tender Service (Central Digital Platform).

As described in the main body of this report, the Tender has been divided into a number of individual Lots. Tenderers will be invited to bid for one, some or all Lots. The highest scoring tenderer for the most advantageous tender option for the respective Lot will be recommended for award of that contract.

Contracts of the value set out in this report are regarded as key decisions under the Council's Constitution and as such require a decision needs to be taken by the Council's Cabinet. Additionally, as the value of the new contracts are expected to be over the UK public procurement thresholds, the Contract must be advertised via the Find-a-Tender in accordance with the Procurement Act 2023 and/or other applicable procurement legislation.

Whilst there will be no Council staff affected by the Transfer of Undertaking (Protection of Employment) Regulations 2006 (TUPE) as amended, there will be TUPE implications for staff employed by the current providers. The Council should be made aware of any TUPE implications which will become clearer through the tender process.

6. Other implications

6.1. How will this contribute to the One Coventry Plan?

<https://www.coventry.gov.uk/strategies-plans-policies/one-coventry-plan>

The commissioning of the housing related support services will ensure:

- Accommodation and support services directly support the One Coventry Plan and many of the wider outcomes of the Council's partners including those related to community safety, health and wellbeing and social inclusion.
- The services will contribute towards the One Coventry Plan priorities of improving outcomes and tackling inequalities for people who are experiencing homelessness.

6.2. How is risk being managed?

The main risk is that we fail to meet the required timescales thus resulting in failure to award the new contracts in time for 1st April 2026 start date.

To mitigate the risk, a detailed project plan has been developed which will be monitored by the Head of Housing. A 4-month mobilisation period is also realistic for the services required.

6.3 What is the impact on the organisation?

The Housing and Homelessness Commissioning and Partnerships Lead will be required to manage the re-commissioning and procurement process and the mobilisation and subsequent delivery of the contracts once awarded. Sufficient resources are currently in place to do this effectively.

6.4. Equalities / EIA?

Owing to the nature of the services provided, service users from certain demographic groups are more likely to come into contact with the services. The 2024 Homelessness Review provides full details in terms of demand from certain demographics groups.

A full EIA is being completed, and we believe there will be no new or disproportional impact on any group or people with protected characteristics compared with the previous impact.

6.5. Implications for (or impact on) climate change and the environment?

None

6.6. Implications for partner organisations?

Providing good quality housing and homelessness services enables effective partnership working

Report author:

Sophie Hall

Housing and Homelessness Commissioning and Partnerships Lead

Directorate:

Housing and Homelessness,

Care, Health and Housing

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Enquiries should be directed to the above person

Contributor/approver name	Title	Directorate	Date doc sent out	Date response received or approved
Contributors:				
Michelle Salmon	Governance Services Officer	Law and Governance	06/06/2025	06/06/2025
Jim Crawshaw	Head of Housing and Homelessness	Care, Health and Housing	06/06/2025	10/06/2025
Gurbinder Sangha	Corporate and Commercial Lead Lawyer, legal Services	Law and Governance	10/06/2025	10/06/2025
Names of approvers for submission: (officers and members)				
Barry Hastie	Director of Finance and Resources	-	06/06/2025	10/06/06
Pete Fahy	Director of Care, Health and Housing	-	09/06/2025	10/06/2025
Councillor N Akhtar	Cabinet Member for Housing and Communities	-	10/06/2025	13/06/25

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Please see page 2 onwards for background to items

5 June 2025
Cabinet Member Portfolio Priorities One Strategic Plan and Education Capital Programme 2024-2028 (Cabinet Report)
3 July 2025
Coventry Protocol for Addressing Adult Modern Slavery (Cabinet Report) The Re-Commissioning of Housing Related Support Services (Cabinet Report)
21 August 2025
SEP Progress 24-25 SEP Business Plan 25-26 One Coventry Plan Performance Report (Cabinet Report)
25 September 2025
Scrutiny Work Programmes One Coventry Plan Performance – Deep Dive Review Recommendations Communications Strategy
30 October 2025
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Transformation Programme update
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9 April 2026
2025-26
One Coventry Plan Performance Report Domestic Abuse Climate Change Cost of Living and Poverty Offender Management Regulation 19 Local Plan – representations and findings WMCA Integrated Settlement Coventry Cultural Strategy – progress report – refer to SB4 AI - Progress
Future items
PSPO reviews – 2027-28

SCRUCO Work Programme 2025-26

Date	Title	Detail	Cabinet Member/ Lead Officer
5 June 2025	Cabinet Member Portfolio Priorities	To invite Cllr Duggins and Cllr AS Khan to identify their priorities for the coming year, for Scrucro to be able to identify future items and hold Cabinet Members to account	Cllr Duggins Cllr AS Khan
	One Strategic Plan and Education Capital Programme 2024-2028 (Cabinet Report)	To consider the Council's plan for school places. To invite members of SB2 included Co-optees. Mapping of in-year migration and home education and impact of forecast data	Cllr Sandhu R Sugars
3 July 2025	Coventry Protocol for Addressing Adult Modern Slavery (Cabinet Report)	A Cabinet Report to agree the protocol for Modern Slavery	Hebe Lawson D Blackburn Cllr AS Khan
	The Re-Commissioning of Housing Related Support Services (Cabinet Report)	A Cabinet Report to agree the requirements for the commissioned housing related support services from 1 st April 2026	Pete Fahy Cllr N Akhtar
21 August 2025	SEP Progress 24-25		Tim Fawcett Cllr O'Boyle
	SEP Business Plan 25-26		
	One Coventry Plan Performance Report (Cabinet Report)		Clare Boden-Hatton Cllr Duggins
25 September 2025	Scrutiny Work Programmes	An opportunity to have oversight of all scrutiny board work programmes	Scrutiny Team Cllr Lloyd
	One Coventry Plan Performance – Deep Dive Review Recommendations	To consider recommendations arising from the deep dive review of performance indicators	Cllr Lloyd Elan Jones
	Communications Strategy	To consider the refreshed Communications Strategy with the new Director in post – To include Internal comms to promote the One Coventry Priorities.	Carl Holloway Cllr Duggins
30 October 2025			

SCRUCO Work Programme 2025-26

Date	Title	Detail	Cabinet Member/ Lead Officer
20 November 2025	Transformation Programme update	An update on progress following the item in November 2024	Cllr Brown C Boden-Hatton
11 December 2025			
15 January 2026	Complaints Reports	When the Committee consider this issue, appropriate officers from service areas attend the meeting	Adrian LeCras Mandeep Chouhan Cllr Brown
5 February 2026			
12 March 2026	Shareholder Reports – Published Accounts		
9 April 2026			
2025-26	One Coventry Plan Performance Report		Cllr Duggins C Boden-Hatton

SCRUCO Work Programme 2025-26

Date	Title	Detail	Cabinet Member/ Lead Officer
	Domestic Abuse	A regular update item on the progress of delivery on the Domestic Violence and Abuse Strategy	J Ross Cllr AS Khan Cllr P Akhtar
	Climate Change	To consider what the Council is doing to protect the city from the impact of climate change, including partners involved in the delivery and represented on the Climate Change Board, including Resilience and Adaptation, SEP and flood risk by ward. EV Charging points accessibility.	Cllr O'Boyle Colin Knight Rhian Palmer Bret Willers
	Cost of Living and Poverty	To update on support offered to low -income families as well as the OCP indicator of % of children living in relatively low-income families.	Cllr K Caan
	Offender Management	Following an item on Local Policing Update at their meeting 21 st February 24 the committee agreed to consider a further item on Offender Management	Cllr AS Khan Davina Blackburn
	Regulation 19 Local Plan – representations and findings	As agreed at their meeting on 18 th December the committee requested the representations and any findings on the consultation on the Regulation 19 Stage of the review of the Local Plan, to time with any Cabinet and Council report.	Cllr N Akhtar R Back
	WMCA Integrated Settlement	To look in more detail at the work that will be delivered though the integrated settlement from the devolution deal	Cllr Duggins Kim Mawby etc.
	Coventry Cultural Strategy – progress report – refer to SB4	Progress in delivering the Cultural Works model, including communication with Members. – refer to SB4 – include Commonwealth Games legacy.	David Nuttall/ Salla Virman Cllr N Akhtar
	AI - Progress	A progress update on recommendations made at the meeting on 6 March 2025	Paul Ward Cllr Hetheron/Cllr Brown

Date	Title	Detail	Cabinet Member/ Lead Officer
Future items	PSPO reviews – 2027-28	To be considered by scrutiny as part of the 3-year review	Davina Blackburn

Work Programme Decision Flow Chart

