

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.

Wards 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:

None

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 - 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: 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 who 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.

Report author:

Hebe Lawson
Modern Slavery Lead, Community Safety Officer

Directorate:

Regulatory Services, Law and Governance

Tel and email contact:

Tel: +44 24 7538 1075

Email: hebe.lawson@coventry.gov.uk

Enquiries should be directed to the above person

Contributor/approver name	Title	Directorate	Date doc sent out	Date response received or approved
Contributors:				
Davina Blackburn	Strategic Lead - Regulation and Communities	Regulatory Services, Law and Governance	12/05/2025	12/05/2025
Adrian Chowns	Head of Safer Communities	Regulatory Services, Law and Governance	12/05/2025	16/05/2025
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)				
Richard Shirley	Lead Accountant	Finance and Resources	12/05/2025	13/05/2025
Amy Wright	Solicitor, Legal Services	Law and Governance	12/05/2025	12/05/2025
Joanne Pay	People Services Business Partner	People	12/05/2025	20/05/2025
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
Councillor AS Khan	Cabinet Member for Policing and Equalities	-	11/06/2025	12/06/2025

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