

Equality Impact Assessment

EIA-705805695 - Coventry Protocol for Addressing Adult Modern Slavery

Details

Title	Coventry Protocol for Addressing Adult Modern Slavery
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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

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| 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