



Modern Slavery and Human Trafficking Statement

This Modern Slavery statement outlines Coventry City Council's commitment to being an ethically, environmentally and socially responsible organisation.

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms¹ such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

About Coventry

Coventry is a city of around 360,000 residents², and sits at the centre of a sub-region serving more than half a million people.

Coventry covers an area of approximately 9,833 hectares and is of a predominantly urban character. The city's urban form is tightly constrained, being almost entirely bordered by the West Midlands and Warwickshire Green Belts.

To accommodate its growth, Coventry's boundaries have been changed and extended several times during the last century, with the latest additions happening in 1994.

Our Structure

Since 2010, Coventry City Council – along with Solihull Metropolitan Borough Council and Warwickshire County Council – has signed up to the Shared Procurement Strategy, and worked on a number of collaborative exercises.

This strategy has continued to support the development of intelligent strategic procurements, leading to the delivery of savings and efficiencies whilst using procurement power to deliver the required economic growth in our local communities.

Our Policies and Values

Coventry City Council supports national objectives to eradicate modern slavery and human trafficking and recognises the significant role the Council has to play in both combatting it, and supporting victims.

In particular, we are committed to ensuring our supply chains and business activities are free from ethical and labour standards abuses.

- **Whistleblowing Policy**

The Council takes malpractice seriously and encourages people to speak out if they are aware of any actual or potential misconduct or wrongdoing within the organisation. The Council is committed to creating an open culture, where concerns can be raised without fear of retaliation.

- **Employee Code of Conduct**

All Council employees are expected to follow a Code of Conduct – that not only ensures they act professionally, but also keeps them safe and above reproach at work.

¹ As defined by the Gangmasters Licensing Authority

² http://www.coventry.gov.uk/info/195/facts_about_coventry/2435/population_and_demographics

The Code sets out the standards of conduct for all employees and is a guide to help staff do their jobs with trust and honesty; treat others with dignity and respect; and maintain the high standards expected of public service employees.

- **Business Charter Policy**

The Charter has been put together to capture the spirit, style and behaviours the Council will adopt and encourage our partners/suppliers to adopt as we jointly work together in an open, positive and honest manner to maximise the level of customer satisfaction and value the Council delivers to the residents of Coventry.

The Charter focuses on nine areas, including equality and diversity, environmental sustainability and safeguarding. Businesses are being encouraged to sign up, as a committed approach to these responsibilities will help achieve economic, social and enhanced reputational benefits for the business as well as the community.

- **Procurement Strategy**

Across the three upper tier authorities within the Coventry, Solihull, Warwickshire (CSW) sub-region, spending this money well through effective procurement is fundamental to achieving organisational success for the three authorities and supporting prosperity across the sub-region.

The Councils have formally recognised by the signing of a Memorandum of Understanding in March 2012 that working together on procurement can contribute to a wide range of socioeconomic benefits including a successful local economy, a thriving voluntary sector, community empowerment, equality, consideration for the environment and value for money.

- **Equality & Diversity Policies**

Coventry City Council's equality, diversity and inclusion policy is our commitment to creating a welcoming, inclusive workplace with a culture which respects and values each other's differences, which promotes dignity, equality, diversity and inclusion and which encourages individuals to develop and maximise their true potential.

Our commitment to equality, diversity and inclusion is grounded in, but not limited to, our responsibilities under the equality legislation. The Equality Act 2010 sets out ways in which everyone is protected by the legislation, and requires Coventry City Council to:

- Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act.
- Advance equality of opportunity between people who share a protected characteristic and those who do not.
- Foster good relations between people who share a protected characteristic and those who do not.

Coventry City Council will continually challenge all forms of unlawful discrimination in its organisation, employment practices and provision of services and provide a workplace which is respectful of everyone and services which demonstrate this commitment.

- **Social Value Policy**

The Council has developed a set of outcomes that will allow it to consider the economic, social and environmental well-being of the city and its residents when commissioning and procuring goods and services. This includes the promotion of safeguarding and welfare of children, young people and vulnerable adults. These outcomes are based on the vision, values and priorities contained in the Council Plan.

- **Domestic Violence and Abuse Policy**

The Coventry Domestic Abuse Strategy 2018-2023 addresses domestic abuse, including honour-based violence and forced marriage. It recognises that domestic abuse can affect anyone.

The priorities of the strategy have been informed by engagement with a wide range of stakeholders including service users, young people, adults with care and support needs, domestic abuse service providers, other voluntary and community sector providers, West Midlands Police, community safety, health and social care, Coventry and Rugby clinical commissioning group and Education.

The strategy acknowledges the overlap with other crimes such as child sexual exploitation and modern slavery.

Our Ethical Procurement Process

Coventry City Council's procurement activity is governed by and delivered within a significant and complex legislative framework. The Public Contract Regulations (PCRs) 2015 enact the 2014 EU Directive (2014/24/EU) into UK law and dictate how public procurement must be undertaken across all of the member states within the European Union.

Similarly, other examples of law impacting the way in which we procure our goods and services include, but are not limited to;

- Public Services (Social Value) Act 2012
- Competition Act 1998
- Localism Act 2011
- Freedom of Information Act 2000
- Equality Act 2010

The Council's competitive tender procedure includes a mandatory exclusion selection criteria regarding the Modern Slavery Act 2015³ and questions in relation to compliance with Equality legislation.

If a Supplier seriously misrepresents any factual information in filling in the Selection Questionnaire, and so induce an authority to enter into a contract, there may be significant consequences. The Supplier(s) may be excluded from the procurement procedure, and from bidding for other contracts for three years. If a contract has been entered into the Supplier(s) may be sued for damages and the contract may be rescinded. If fraud, or fraudulent intent, can be proved, the Supplier(s) or their responsible officers may be prosecuted and convicted of the offence of fraud by false representation, and the Supplier(s) must be excluded from further procurements for five years.

The Council challenges any abnormally low-cost tenders to ensure they do not rely upon the potential Supplier(s) practising modern slavery.

Our Supply Chains

Coventry City Council is committed to operating responsibly and with high ethical standards, particularly with regard to human rights issues, and will not tolerate human trafficking and other forms of slavery within our operations. We expect equally high standards from our supply chain.

The Council's supply chain is varied and includes individuals, SMEs and multi-national corporations. We recognise that modern slavery and human trafficking can occur anywhere in the supply chain both in the UK and internationally, and regardless of the supplier size or nature of the products or services being purchased.

³ http://www.legislation.gov.uk/ukpga/2015/30/pdfs/ukpga_20150030_en.pdf

Training

To ensure there is a high level of understanding of the modern slavery and human trafficking risks in the Council's supply chain, various training programmes have been developed to increase the knowledge and skill set of the Council staff. Examples of the training available to Council staff include, but are not limited to;

- **Chartered Institute of Procurement and Supply**

All procurement staff are required to be a qualified, or working towards becoming a qualified, Member of the Chartered Institute of Procurement and Supply. The modern role of professional procurement is a complex one demanding a wide range of business skills and commercial expertise to succeed.

- **Equality and Diversity**

The Council ensures that all staff undertake corporate mandatory training in Equality & Diversity within the first month of joining, and every **three** years thereafter.

- **Safeguarding**

The Council ensures that all staff undertake corporate mandatory training in Safeguarding Awareness within the first month of joining, and every **three** years thereafter.

Working Together to Safeguard Children 2015 places a responsibility on Coventry Local Safeguarding Children Board (LSCB) to ensure that training is provided for people who work with children or in services affecting the safety and welfare of children and that there should be monitoring and evaluation of the effectiveness of this training.

The Council has introduced a skills matrix across its Adult Social Care provision, identifying mandatory, desirable and role related courses. The matrix includes mandatory courses in safeguarding and equality.

Coventry City Council's Effectiveness and Further Steps

The Council has endorsed the motion to adopt the Co-operative Party Modern Slavery Chapter. In doing so, the Council will;

1. Train its corporate procurement team to understand modern slavery through the Chartered Institute of Procurement and Supplies (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. Continue to 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 system for staff to blow the whistle on any suspected examples of modern slavery. The Council's whistleblowing policy is available on its website; http://www.coventry.gov.uk/downloads/file/26630/whistleblowing_policy
6. Require its tendered contractors to adopt a whistle blowing policy 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 of concern regarding modern slavery.
10. Report publicly on the implementation of this policy annually.

Section 52 of the Modern Slavery Act 2015 introduced a duty to notify the secretary of state of any victims of modern day slavery. This duty applies to a number of public bodies including Local Authorities. If there are indicators of potential victims of modern day slavery, then a National Referral Mechanism (NRM) referral must be made. Information on how to make a referral can be found on the Council's intranet.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Coventry City Council's modern slavery and human trafficking statement for the financial year ending 2018. This statement will be reviewed and updated accordingly on an annual basis.

This statement has been approved by:

Cllr George Duggins

Friday 6 September 2019

Cllr George Duggins
Coventry City Council Leader

Date