

# Modern Slavery and Human Trafficking Statement 2025/26

## 1. Introduction

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

Coventry City Council is committed to preventing modern slavery and human trafficking in all its forms throughout our operations and supply chains. We recognise our fundamental responsibility to respect human rights and to ensure that we take a robust approach in tackling these issues which have no place in our organisation or the communities we serve.

This statement reflects Coventry City Council's commitment to the UK Government's United Nations Guiding Principles on Business and Human Rights and the UK Modern Slavery Act 2015, outlining our approach to identifying, preventing, and mitigating modern slavery risks.

This Modern Slavery statement is for the financial year 2025/2026 and meets the requirements of Section 54 Transparency in Supply Chains of the Modern Slavery Act 2015.

### 1.1. Definition of Modern Slavery

Modern Slavery is a crime and a violation of fundamental human rights. It takes various forms<sup>1</sup> 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.

Modern Slavery includes a range of types of exploitation, many of which occur together. These include but are not limited to:

- **Sexual exploitation:** survivors may be forced into prostitution, pornography, or other sexual services for little or no pay. They may be deprived of their freedom of movement and subjected to threats and violence.
- **Labour exploitation:** a survivor is made to work with little or no pay and may face violence or threats. If they are foreign nationals, their passports may be confiscated by their exploiters, and they may be made to live in terrible conditions and under constant threat.
- **Criminal exploitation:** survivors can be forced to participate in a range of illegal activities including pick pocketing, shop lifting, cannabis cultivation, county lines exploitation and other activities. The Modern Slavery Act provides a defence for survivors who have been forced into criminality.
- **Organ harvesting:** survivors are trafficked in order for their internal organs and bodily tissue (typically kidneys or the liver) to be harvested for transplant.
- **Domestic servitude:** survivors work in a household where they may be ill-treated, humiliated, subjected to exhausting hours, forced to work and live under unbearable conditions or forced to work for little or no pay. In some cases, forced marriage can lead to domestic servitude.

Further information about modern slavery and exploitation can be found on the [Council's website](#).

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<sup>1</sup> As defined by the Gangmasters Licensing Authority

## 2. About Coventry

Coventry is a city of around 350,000 residents<sup>2</sup>, 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.

### 2.1. Our Structure

Coventry City Council provides a wide range of statutory and discretionary services for the people of Coventry, including but not limited to bin collections, maintenance of roads & parks, education, housing, infrastructure development and provision of care services for older people and vulnerable children. Coventry City Council's [One Coventry Plan](#) sets out the Council's vision and priorities for the city, to ensure that its commitments are delivered, and the city is improved making it a better place to live and work. Coventry City Council works closely with external partners and contracts with third parties to help deliver its commitments to the local community.

### 2.2. Leadership

Political Leadership:

- Lord Mayor: The ceremonial head of the council, representing the city at official events. As of June 2024, the Lord Mayor is Mal Mutton.
- Leader of the Council: Responsible for the overall strategic direction and policy development. Since May 2016, George Duggins has served as the Leader of the Council.

Senior Management:

- Chief Executive: Oversees the council's operations and implementation of policies. In 2023, Julie Nugent was appointed as the Chief Executive.

The senior management team includes various directors responsible for specific service areas, such as:

- Director of Finance: Manages the council's financial planning and budgeting.
- Director of Education and Skills: Oversees educational services and initiatives within the city.
- Director of Adult Services: Responsible for adult social care and related services.
- Director of Public Health: Leads public health strategies and programs.

For a detailed and up-to-date overview of the senior leadership structure, including specific roles and responsibilities, please refer to the official [Coventry City Council's Senior Leadership Structure document](#). This structured approach enables Coventry City Council to effectively manage its diverse functions, ensuring that services are delivered efficiently to meet the needs of the community.

## 3. Suppliers

We work with an extensive network of suppliers, contractors, and partners to provide our services.

Our supply chains include:

- Construction and infrastructure projects.
- Facilities management and maintenance.
- Procurement of goods such as IT equipment, uniforms, and office supplies.

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<sup>2</sup> [http://www.coventry.gov.uk/info/195/facts\\_about\\_coventry/2435/population\\_and\\_demographics](http://www.coventry.gov.uk/info/195/facts_about_coventry/2435/population_and_demographics)

- Social care services.

In 2024/25, the Council transacted with 3,917 suppliers, including 3,411 Small and Medium Enterprises (SMEs). We are committed to working only with suppliers and partners who share our values and adhere to ethical labour practices.

We acknowledge that our extensive supply chain presents potential risks for modern slavery.

### **3.1. Our Ethical Procurement Process and Supply Chains**

Coventry City Council's procurement activity is governed by its Contract Procedure Rules (CPRs), which are part of the Council's Constitution. In effect the CPRs are instructions to Council Officers & Councillors on how to execute contracts for the provision of goods, services or works on behalf of the Council, in a compliant, transparent, and ethical manner.

The Council is also subject to a legislative framework that is both significant and complex. The UK's exit from the European Union led to the introduction of the Procurement Act 2023 and Statutory Instruments, forms of secondary legislation. The Act and supplementary Regulations came into force on 24 February 2025 and detail how public procurement must be undertaken.

The Council is also subject to the Health Care Services (Provider Selection Regime) Regulations 2023, introduced by the Health Care Act 2022 for the procurement of in-scope health care services and public health services in England.

Furthermore, for contracts entered into prior to the commencement of the Procurement Act 2023, the Council is also subject to the Public Contracts Regulations 2015 in relation to the management of contracts for goods, services and associated works, and the Concession Contracts Regulations 2016 in relation to the management of concession contracts. It is acknowledged that the Council will be managing contracts across multiple sets of regulations for a number of years.

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.

The Council operates a mostly centralised Procurement Service with most of the contract management being carried out within service areas. Coventry City Council has continued to collaborate with Warwickshire County Council, Solihull Metropolitan Borough Council, and other regional Authorities which provides more procurement power to help to address Modern Slavery within the Supply Chains.

The Council's supply chains are varied and include Sole Traders, SMEs and large 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.

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

Coventry City Council will look to understand all potential Modern Slavery risks relating to the procurement activities it undertakes or participates in and agrees to put in place steps to deter and eliminate any Modern Slavery practices within its supply chains. In addition to adopting the Co-operative Party Charter Against Modern Slavery, the Council's Procurement & Commissioning team implement a process as summarised below for procurements above the value of £100k, to ensure high ethical standards from its supply chains:

- **Pre-tender Stage –**
  - A risk-based assessments will be carried out to determine whether the procurement is a 'Low', 'Medium' or 'High' risk with regards to possible Modern Slavery in the supply chain. In turn this will help to mitigate and manage any market risks concerning slavery and human trafficking. This includes identifying industries and market sectors where risks of modern slavery are higher/more prevalent, and target these as higher risks for concern.
- **Selection/Tender Stage –**
  - The Council's competitive tender procedure includes mandatory exclusion selection criteria, regarding the Modern Slavery Act 2015 ("the Act") - Section 54 Transparency in supply chain etc.<sup>3</sup>
  - The Council will challenge any abnormally low-cost tenders to ensure the Council does not contract with a Supplier practising modern slavery.
  - For 'medium' and 'high' modern slavery risk procurements, Tenderers will be required to confirm they will complete and share with Coventry City Council, the results of the Cabinet Office's Modern Slavery Assessment Tool, post contract award
- **Contract Management Stage –**
  - Contract Management will be carried out to:
    - Ensure compliance with the Council's adopted terms and conditions with regards to Modern Slavery
    - For 'medium' and 'high' modern slavery risk procurements, ensure the supplier completes and shares with Coventry City Council, the Cabinet Office's Modern Slavery Assessment Tool
    - Address any identified potential Modern Slavery incidents

Officers should refer to [PPN 009: Guidance on tackling modern slavery](#) for further guidance.

#### **4. 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 survivors. The Council has a range of policies and procedures in place to support our commitment to preventing modern slavery, including:

##### **4.1. [Coventry Protocol for Addressing Adult Modern Slavery](#)**

The Protocol presents the Coventry Modern Slavery Partnership's strategic approach to preventing, combatting, and addressing modern slavery via a 4P strategy, and operational processes for responding to modern slavery.

##### **4.2. [Whistleblowing Policy](#)**

Encouraging employees and partners to report any concerns regarding unethical or illegal practices. The Council is committed to creating an open culture, where concerns can be raised without fear of retaliation.

##### **4.3. [Employee Code of Conduct](#)**

Promoting integrity and ethical behaviour in the workplace. All employees are required to comply with the Code of Conduct as it forms part of their terms and conditions of employment. The Code outlines the minimum standards that an employee must adhere to.

##### **4.4. Procurement Strategy**

Ensuring all suppliers and contractors comply with the Modern Slavery Act 2015. Following legislative changes, the Council is launching a refreshed Procurement

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<sup>3</sup> <https://www.legislation.gov.uk/ukpga/2015/30/section/54/enacted>

Strategy in 2025/26 that 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.

**4.5. Equality & Diversity Policies**

Our commitment to equality, diversity and inclusion is grounded in, but not limited to, our responsibilities under the equality legislation. 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.

**4.6. Social Value & Sustainability Policy**

Details how Social Value & Sustainability is considered and addressed through the Council's day-to-day activities. The Council has developed a set of representative & example Outcomes which are based on the Vision, Approach and Priorities contained in the One Coventry Plan.

**4.7. Domestic Violence and Abuse Strategy**

The Coventry Domestic Abuse Strategy 2018-2025 addresses domestic abuse, including honour-based violence and forced marriage. It recognises that domestic abuse can affect anyone.

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

**4.8. Under Working Together 2018**

Under Working Together 2018 there is a shared responsibility between organisations and agencies to safeguard and promote the welfare of all children in a local area. Many local organisations and agencies have duty under Section 11 of the Children's Act 2004 to ensure that they consider the need to safeguard and promote the welfare of children when carrying out their functions. The responsibility for this join-up lies with the three Safeguarding Partners, the police, the local authority and the CCG, who have a shared and equal duty to make arrangements to work together to safeguard and promote the welfare of all children within the Local Authority.

**4.9. Care Act 2014**

Under the Care Act 2014 each Local Authority must establish a Safeguarding Adult Board (SAB) for its area. The objective of a SAB is to help and protect adults in its area who have care and support needs, are experiencing or at risk of abuse or neglect, and as a result of those needs is unable to protect himself or herself against the abuse or neglect or risk of it. The way in which a SAB must seek to achieve its objective is by co-ordinating and ensuring the effectiveness of what each of its members does.

**4.10. Policy communications**

Policies are reviewed annually and circulated internally at point of renewal. We have ISO19001 accreditation, the above policies are signed off at senior leadership level.

Where stipulated in the tender documents and specifications, Suppliers will be required hold certain accreditations as required. The requirements for each contract the Council procures will vary. Procurement Services will launch a Supplier Code of Conduct in 2025/26 that all Suppliers will be expected to adhere to. The Code of Conduct will be available in the tender documentation and published on the Council's website.

**4.11. Coventry City Council's Values**

Our 'One Coventry Values' have been co-created with the support and input of all employees across the Council, so they are reflective of how we want to be represented both as colleagues and to the wider community.

We want to ensure there is clarity of purpose through the Council's vision of our One Coventry Values and Behaviours; putting diversity and inclusion at the heart of everything we do. Moving forward the values will become an integral part of our: Reward Strategy, Appraisals, Recruitment, Attraction and Onboarding, Recognition and Development and Employee Engagement.

Our values define us as an organisation and influence everything we do and how we treat each other. We recognise the crucial role each and every one of us plays in helping to achieve our goals. We want Coventry City Council to be an inclusive workplace where people know they are valued and feel empowered in their roles to achieve excellence for our customers and communities



## 5. Risk Assessment and Due Diligence

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.

### 5.1. Risk Identification

Coventry City Council prioritises 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 the procurement processes outlined in 3.1, 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

## 6. Training

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

### 6.1. Modern Slavery Training

Coventry City Council have created a training package that seeks to raise awareness, enable staff to better spot the signs, and increase confidence in reporting and

responding to modern slavery when potential cases are encountered. The package consists of three levels of training (basic, intermediate, and advanced) which will equip all council staff to identify and respond to modern slavery to the level required within their roles and responsibilities.

## **6.2. Chartered Institute of Procurement and Supply**

All Category staff in Procurement Services 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. Additionally, said staff are also required to undertake an Ethical Procurement and Supply training on an annual basis.

## **6.3. Contract Management**

Contract Managers will be required to undertake internal supply chain Modern Slavery awareness training, to highlight the risks within the supply chain and to communicate effective strategies for mitigating and managing risk throughout the life of the contract.

## **6.4. Equality and Diversity**

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

## **6.5. Safeguarding**

The Council ensures that all staff undertake corporate Statutory and Mandatory e-learning training in Safeguarding Awareness, which includes modern slavery, within the first month of joining, and every **three** years thereafter.

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.

# **7. Prevention and Mitigation Measures**

## **Employment Practices**

- Rigorous right-to-work checks
- Transparent recruitment processes
- Fair wages and employment conditions
- Whistleblowing and confidential reporting mechanisms
- Staff training on modern slavery recognition

## **Supplier Requirements**

- Mandatory modern slavery policy requirements
- Contractual obligations to demonstrate ethical employment practices, including Open Book where required
- Adherence to the Council's Supplier Code of Conduct once launched
- Regular audits and compliance checks
- Capacity building and awareness training for suppliers

# **8. Engagement**

## **8.1. Co-operative Party Charter Against Modern Slavery**

The Council has endorsed the motion to adopt the Co-operative Party Charter Against Modern Slavery. 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. 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.
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 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.

## **8.2. Community Engagement**

The Council has established the Coventry Modern Slavery Partnership, a group formed of over 15 Council departments and over 35 organisations. The Partnership oversees the implementation, monitoring, and evaluation of the Coventry Protocol for Addressing Adult Modern Slavery, promotes best practice, identifies challenges and gaps in provision and works together to improve ways of working.

The Coventry Protocol for Addressing Adult Modern Slavery has been written by several Council departments and over 30 partner organisations. The Protocol sets out the strategic vision for the Coventry Modern Slavery Partnership and the operational pathways that support this vision.

The Protocol has the following objectives:

- To present the local modern slavery strategy via the pursue, prevent, protect, prepare approach as set out by the central government.
- To illustrate the operational pathways used to respond to modern slavery.
- To establish the ongoing monitoring and evaluation mechanisms for the strategy and pathways

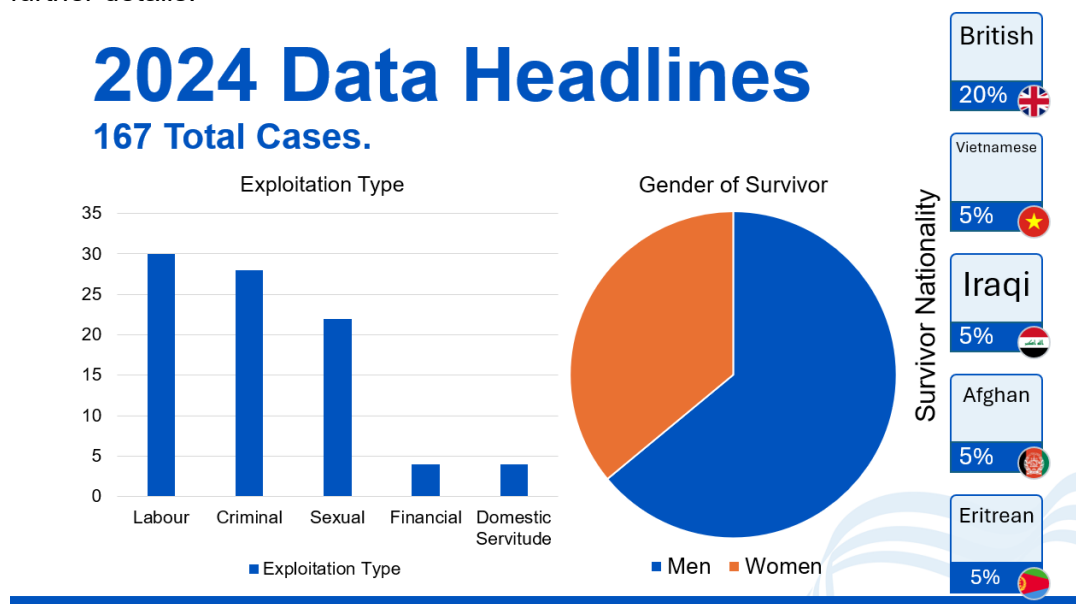
## **9. Reporting, Effectiveness and Accountability**

To evaluate the impact of our efforts, Coventry City Council monitors and reports on:

### **9.1. Reports of modern slavery.**

The Local Authority encourages professionals and the public to [report instances of modern slavery via the online form](#). In 2024, the Council received reports for 167 cases relating to

survivors, perpetrators and locations of adult modern slavery, see below data summary for further details.



## 9.2. Reports to the National Referral Mechanism

Section 52 of the Modern Slavery Act 2015 introduced a duty to notify the secretary of state of any survivors of Modern Slavery. This duty applies to a number of public bodies including Local Authorities. The Local Authority is committed to referring child and adult survivors of modern slavery to the National Referral Mechanism in accordance with their right to consent. In 2024, Coventry City Council made 39 referrals to the National Referral Mechanism<sup>4</sup>.

## 9.3. Training participation rates.

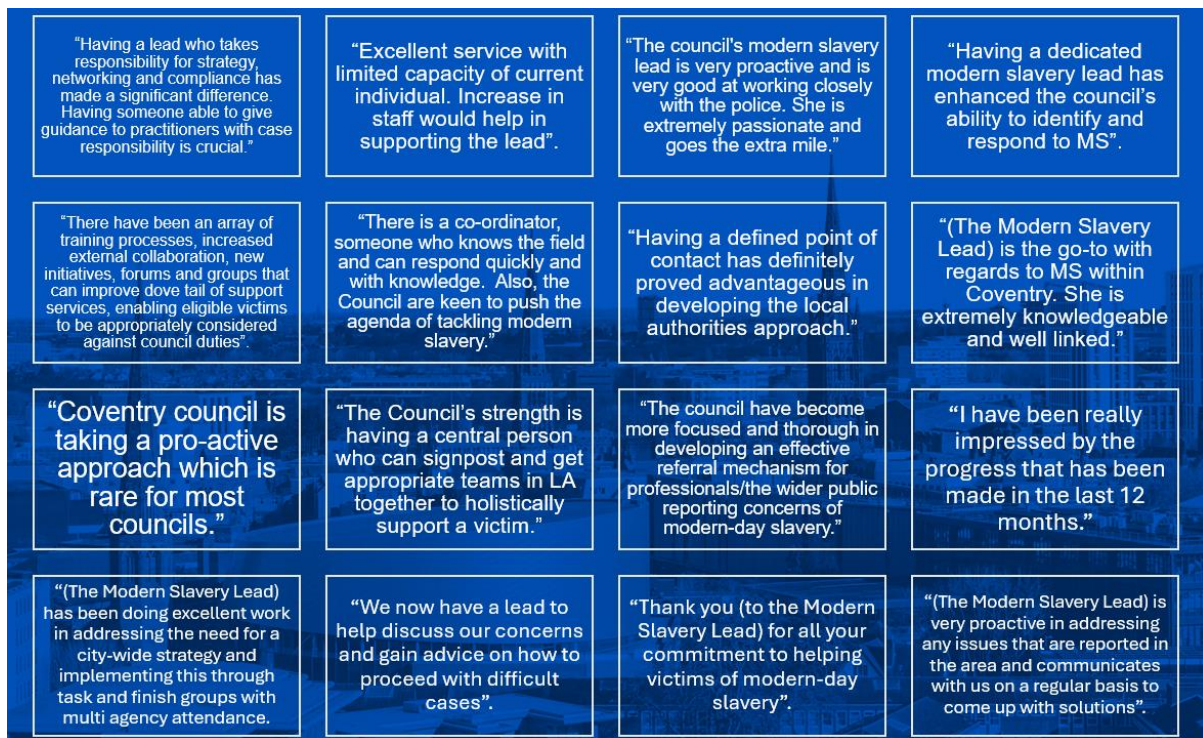
In 2024, the Council's Modern Slavery Lead provided over 20 modern slavery training sessions, reaching over 200 professionals. Over 500 people signed up to the 14 free training sessions that the Council coordinated to mark Anti-Slavery Day on the 18<sup>th</sup> of October 2024. Furthermore, over 270 Council employees have completed internal modern slavery training to date.

In addition, all Procurement Services' Category Managers (x5 FTE), Category Officers (x3 FTE), Category Assistant (x1 FTE) and the Deputy Head of Procurement undertake an annual recertification of Ethical Procurement via the Chartered Institute of Procurement & Supply (CIPS)

## 9.4. Feedback from employees and community stakeholders.

During a 2024 survey amongst the Local Authority and its partners, 100% of respondents agreed that the Council's response to modern slavery had improved since the Modern Slavery Lead was appointed. 100% of respondents agreed that the Council provides useful advice, training, and resources about modern slavery concerns, and over 95% of respondents agreed that the Council is effective in safeguarding victims of modern slavery. Further feedback can be seen below.

<sup>4</sup> <https://www.gov.uk/government/statistics/modern-slavery-nrm-and-dtn-statistics-end-of-year-summary-2024>



## 10. Governance

The Council's responsibility for modern slavery sits within the Community Safety Partnership and is monitored via the establishment of relevant forums, which report into the Community Safety Board. The Coventry Protocol for Addressing Adult Modern Slavery will be implemented and evaluated via the creation of annual action plans and reports.

## 11. Continuous Improvement

Coventry City Council is committed to strengthening its efforts to combat modern slavery by following our extensive 2025/2026 Action Plan. The Action Plan focuses on four main areas:

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

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

**Protect** - How we will protect survivors of modern slavery.

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

## 12. Conclusion

Coventry City Council remains steadfast in its commitment to preventing modern slavery. We recognise that this is an ongoing process requiring vigilance, collaboration, and continuous learning.

## 13. Approval and Signature

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 2024. It has been approved by Coventry City Council's Cabinet and is reviewed annually to ensure its effectiveness and relevance.

This statement has been approved by:

Cllr George Duggins

2<sup>nd</sup> October 2025

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Cllr George Duggins

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Dated

Coventry City Council Leader