



**Information Governance Team**

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11 December 2019

Dear Sir/Madam.

**Freedom of Information Act 2000 (FOIA)  
Request ID: REQ06481**

Thank you for your request for information relating to Anti-Semitism definition and code of conduct.

You have requested the following information:

**1a. Has the International Holocaust Remembrance Alliance Definition of Antisemitism ('IHRA Definition') been adopted by Coventry City Council? See [antisemitism.uk/definition](http://antisemitism.uk/definition) for more information about the IHRA Definition.**

**1b. If the IHRA Definition has been adopted, please provide the date that the motion to do so was approved.**

**1c. If the IHRA Definition has been adopted, was the IHRA Definition adopted in its entirety including all of the examples?**

**1d. If all of the examples were not adopted, which ones were omitted?**

**1e. If the IHRA Definition has not been adopted at all, was there a motion to adopt the IHRA Definition which was defeated, and if so on what date was it defeated?**

**1f. If the IHRA Definition has not yet been adopted, has adoption been timetabled?**

**2a. If adopted, has the IHRA Definition been incorporated into the members' code of conduct?**

**2b. If adopted, has the IHRA Definition been incorporated into the officers' and employees' code of conduct and conditions of employment?**

For questions 1a to 2b Coventry City Council has not adopted the IHRA working definition of anti-Semitism and is keeping its position under review.

We can confirm that we hold this information and further information is accessible to you via the Council's website on the following link:-

[https://www.coventry.gov.uk/directory\\_record/35281/international\\_holocaust\\_remembrance\\_alliance/category/141/council\\_and\\_democracy](https://www.coventry.gov.uk/directory_record/35281/international_holocaust_remembrance_alliance/category/141/council_and_democracy)

We therefore do not have to provide the information as per Section 21 of the FOIA.

**2c. Who is responsible for investigating or monitoring alleged breaches of the council's codes of conduct for members and also for employees/officers? Please provide their name, job title, e-mail address and direct telephone number.**

Julie Newman, Head of Legal Services and Monitoring Officer  
Email: [Julie.Newman@coventry.gov.uk](mailto:Julie.Newman@coventry.gov.uk)

**3a. How many formal complaints of antisemitic conduct has Coventry City Council considered between 1st January 2017 and 31st December 2018 against members, officers or council employees?**

**3b. How many complaints resulted in disciplinary action?**

**3c. How many complaints resulted in no disciplinary action?**

For questions 3a to 3c we hold the information which you have asked for but we have estimated that the cost of meeting your request would exceed the cost limit of £450 specified in the Freedom of Information and Data Protection (Appropriate Limit and Fees Regulations 2004). This represents the estimated cost of one person spending 18 hours or more, in determining whether the information is held, locating, retrieving and extracting it.

The information is not recorded in a current report format. To obtain the information, an officer will need to undertake a manual check of all employee records for the requested time period. Due to the volume of records held, it is estimated this would take approximately 660 hours to complete. This part of your request has therefore been refused under section 12(2) of the Act.

However, in order to fulfil our obligations under Section 16 of the FOI Act to advise and assist you, we advise that there have been no recorded complaints from the public against Council employees since January 2017 regarding antisemitic conduct.

Furthermore, there are no recorded complaints made against Councillors relating to anti-Semitism during the requested time period.

**4a. Who is responsible for complying with Coventry City Council's legal obligations in relation to equality and diversity? Please provide their name, job title, e-mail address and direct telephone number.**

Liz Gaulton, Director of Public Health  
Email: [Liz.Gaulton@coventry.gov.uk](mailto:Liz.Gaulton@coventry.gov.uk)

**4b. What training does Coventry City Council provide to its members, officers and employees specifically on antisemitism as opposed to generally against all forms of discrimination prohibited under the Equality Act 2010?**

There is no specific training provided on anti-Semitism.

**4c. If such specific training on antisemitism is provided, is it conducted by Coventry City Council in-house or is it outsourced to a training provider?**

**4d. If such specific training on antisemitism is outsourced, which organisation(s) provide the training?**

For questions 4c to 4d these are not applicable, please refer to 4b.

**5. Who is Coventry City Council's Prevent Coordinator? Please provide their name, job title, e-mail address and direct telephone number.**

Email: [Prevent@coventry.gov.uk](mailto:Prevent@coventry.gov.uk)

Please note that we only disclose names at a senior level and are unable to provide you the name as this information is exempt under Section 40 of the FOIA.

This has been done as the Council considers that this information meets the definition for personal data set out in Section 3(2) and 3(3) of the Data Protection Act 2018 ("DPA") as:

*(2) "personal data means any information relating to an identified or identifiable living individual (subject to subsection (14)(c))"*

*(3) "Identifiable living individual" means a living individual who can be identified, directly or indirectly, in particular by reference to –*

*(a) an identifier such as a name, an identification number, location data or an online identifier, or*

*(b) one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of the individual."*

The Council thus considers that the requested information is caught by the exemption to disclosure contained in Section 40 (2) of the FOI Act and the related first condition of Section 40 (3).

The supply of information in response to a freedom of information request does not confer an automatic right to re-use the information. You can use any information supplied for the purposes of private study and non-commercial research without requiring further permission. Similarly, information supplied can also be re-used for the purposes of news reporting. An exception to this is photographs. Please contact us if you wish to use the information for any other purpose.

For information, we publish a variety of information such as: [FOI/EIR Disclosure Log](#), [Publication Scheme](#), [Facts about Coventry](#) and [Open Data](#) that you may find of useful if you are looking for information in the future.

If you are unhappy with the handling of your request, you can ask us to review our response. Requests for reviews should be submitted within 40 days of the date of receipt of our response to your original request – email: [infogov@coventry.gov.uk](mailto:infogov@coventry.gov.uk)

If you are unhappy with the outcome of our review, you can write to the Information Commissioner, who can be contacted at: Information Commissioner's Office, Wycliffe

House, Water Lane, Wilmslow, Cheshire, SK9 5AF or email [casework@ico.org.uk](mailto:casework@ico.org.uk).

Please remember to quote the reference number above in your response.

Yours sincerely

**Information Governance**