

Haringey Modern Slavery Plan

September 2020

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Note:

All contacts and weblinks are correct at the time of publication. It will be important to refresh this as work develops with this led by the Modern Slavery Co-Ordinator.

- This symbol is used throughout the document to highlight information which relates to children and young people (under 18).

1. Purpose

Modern slavery is the exploitation and control of one person by another. It is a varied, international and often hidden crime which includes human trafficking, sexual exploitation and forced labour.

This plan sets out the current approach to tackling modern slavery in Haringey and identifies areas for development over the next two years.

The plan will focus on the following areas, which will form our strategic response:

- Data & Intelligence
- Awareness & Training
- Reporting concerns
- Support for Victims
- Disruption, Prosecution and Procurement
- Responding to Covid-19
- Engagement with the Voluntary and Community Sector

Modern slavery is a complex and challenging issue and as such we want to involve our partners and communities in how we respond collectively. This plan has been developed through engagement with a wide range of stakeholders including the police, health colleagues and the voluntary and community sector (VCS).

The council is developing this plan because we want work with partners to make progress on this issue, fulfilling our statutory duties and improving outcomes for our most vulnerable residents. We want to ensure those living, working and visiting Haringey feel welcome, safe and free from harm¹ and are committed to working in collaboration to achieve this.

¹Haringey Borough Plan 2019-2023. Haringey Council. 2019
https://www.haringey.gov.uk/sites/haringeygovuk/files/borough_plan_2019-23.pdf

2. Modern Slavery in the UK

What is Modern Slavery?

Modern slavery is an umbrella term encompassing human trafficking slavery, servitude and forced labour.

Someone is in **slavery** if they are:

- Forced to work through mental or physical threat
- Owned or controlled by an 'employer' usually through mental or physical abuse or threat of abuse
- Dehumanised, treated as a commodity or bought and sold as 'property'
- Physically constrained or have restrictions placed on their freedom²

Servitude, like slavery, involves a person being under an obligation to provide a service which is imposed on them, but unlike slavery, there is no element of ownership.

Forced labour is when a person is coerced to work using violence or intimidation, or by more subtle means such as debt bondage.³ This form of modern slavery has been found in a number of different industries including manufacturing, agriculture, and hospitality.

Human trafficking is when people are moved and forced into exploitation. The movement could be international but also within the country. A person is a victim of human trafficking even if they have not yet been exploited but have been moved for the purposes of exploitation

Human trafficking is different from, yet closely linked to, **smuggling**, in which a person gives consent to be moved across an international border. However, people who have been smuggled sometimes go on to become victims of modern slavery.

- **Child labour** refers to any enslavement of a child, whether this is forced labour, domestic servitude or sexual exploitation.

² Unseen, www.unseenuk.org/about/the-problem/modern-slavery

³ International Labour Organisation, https://www.ilo.org/global/topics/forced-labour/news/WCMS_237569/lang-en/index.htm

Types of Modern Slavery

Forms of modern slavery, many of which occur together, include:



SEXUAL EXPLOITATION

This includes but is not limited to sexual exploitation and sexual abuse, forced prostitution and the abuse of children for the production of child abuse images/videos. 34% of all reported trafficking victims in the UK are victims of sexual exploitation.²



DOMESTIC SERVITUDE

This involves a victim being forced to work in usually private households, usually performing domestic chores and childcare duties. Their freedom may be restricted and they may work long hours often for little or no pay, often sleeping where they work. 11% of all potential modern slavery victims in 2016 were subjected to domestic servitude.³



FORCED LABOUR

Victims may be forced to work long hours for little or no pay in poor conditions under verbal or physical threats of violence to them or their families. It can happen in various industries, including construction, manufacturing, laying driveways, hospitality, food packaging, agriculture, maritime and beauty (nail bars). Often victims are housed together in one dwelling. 47% of potential victims of Modern Slavery reported to have been exploited in the UK are subject to forced labour. 18% of all reported forced labour victims in the UK are children – an increase of 62.5% since 2015. 81% of all reported victims of forced labour taking place in the UK are male.⁴



CRIMINAL EXPLOITATION

This can be understood as the exploitation of a person to commit a crime, such as pick-pocketing, shop-lifting, cannabis cultivation, drug trafficking and other similar activities that are subject to penalties and imply financial gain for the trafficker. In the UK in 2016, 34 potential modern slavery victims were also involved in fraud or financial crime whereby perpetrators force victims to claim benefits on arrival but the money is withheld, or the victim is forced to take out loans or credit cards.⁵ Cannabis cultivation is the highest category of criminal exploitation with 33% of those being a minor at the time of referral, the majority being Vietnamese.⁶



OTHER FORMS OF EXPLOITATION

Organ removal; forced begging; forced benefit fraud; forced marriage and illegal adoption.

Figure 2: Types of Modern Slavery- UK Government Briefing⁴

⁴ Types of Modern Slavery UK Government Briefing:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/638368/MS_-_a_briefing_NCA_v2.pdf

National Context

It is estimated that 40.3 million people are in modern slavery worldwide, this includes 24.9 million in forced labour and 15.4 million in forced marriage.

In the UK this figure is estimated to be between 10,000 and 130,000, although this a conservative estimate and others estimate the figure is closer to 136,000⁵. The cost of modern slavery is estimated to be between 3.3 and 4.3 billion⁶.

Table 1, The total costs of suspected victims of modern slavery by category⁷

Total costs	Anticipation	Physical and emotional harm	Lost output and time	Health services	Victim services	Law enforcement costs	Suspected victims
Labour exploitation	£0.14m	£181.2m	£27.2m	£2.4m	£8.4m	£39.7m	£259.1m
Sexual exploitation	£0.13m	£171.2m	£23.7m	£7.5m	£7.9m	£37.2m	£247.6m
Domestic servitude	£0.04m	£57.4m	£20.2m	£0.6m	£2.7m	£12.0m	£92.8m
Total	£0.31m	£409.8m	£71.1m	£10.5m	£19.0m	£88.9m	£599.5m

Some of the cost categories do not apply to unknown victims, so for estimating the overall costs to society of modern slavery, the health and victims services and law enforcement costs are only scaled up for suspected victims and no further. When scaling up further to the estimates of all victims (where applicable), the estimated total costs are between £3.3 billion and £4.3 billion.

In 2019, over 10,000 people were referred to the National Referral Mechanism because they were thought to be victims of slavery. Just over half of the referrals were for adults, and two thirds were male. Most male victims are coerced into forced labour, and most female victims are coerced into prostitution.

One in four victims are British but many others come from countries across the world such as Albania, Vietnam and China.

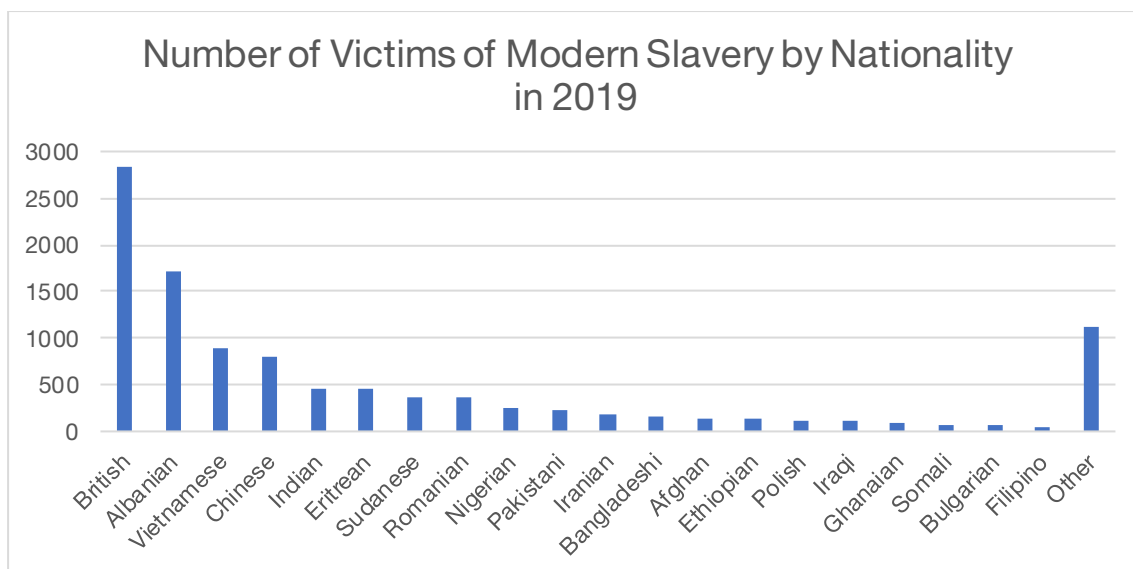
Table 2, Number of victims of modern slavery by nationality in 2019⁸

⁵ The Global Slavery Index, United Kingdom, <https://www.globallslaveryindex.org/2018/findings/country-studies/united-kingdom/>

⁶ The economic and social costs of modern slavery: Research Report 100. The Home office 2018. https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/729836/economic-and-social-costs-of-modern-slavery-horr100.pdf

⁷ Ibid, page 25

⁸ Statistics taken from National Referral Mechanism statistics UK: End of year summary 2019 <https://www.gov.uk/government/statistics/national-referral-mechanism-s-statistics-uk-end-of-year-summary-2019>



There has been a substantial increase in those exploited as minors through criminal exploitation. This has been driven by the increase in the identification of ‘county lines’ cases. County lines is used to describe drugs gangs in large cities expanding their reach to small towns, through exploiting individuals to transport substances and mobile phone ‘lines’ are used to communicate orders.⁹

Local Context

Data at the local authority level on modern slavery in the borough is limited. Data is available on referrals to the National Referral Mechanism (NRM), from the police on offences and victims and from the modern slavery helpline. The true scale of modern slavery in the borough is unknown.

There has been a slow increase in the number of people referred as potential victims of slavery in Haringey. The table below illustrates this¹⁰.

Table 3, Number of potential victims of referred in Haringey since 2014

Year	No. of adults	No. of minors	Total
2019	2	15	17
2018	2	4	6
2017	0	8	8
2016	0	0	0
2015	0	1	1
2014	Not recorded	Not recorded	1

In Haringey, more children are referred to the NRM than adults. This could mean that child exploitation is more common than adult exploitation, or that child

⁹ Home Office, National Referral Mechanism Statistics UK, End of Year Summary, 2019 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/876646/national-referral-mechanism-statistics-uk-end-of-year-summary-2019.pdf

¹⁰ Data from National Referral Mechanism, <https://nationalcrimeagency.gov.uk/who-we-are/publications?search=&category%5B%5D=3&limit=15&tag=&tag=>

exploitation is more likely to be found and reported. The increase in 2019 of children referred is likely due to increased identification of county lines cases.

Data from the Modern Slavery Helpline (MSH) reveals that they were contacted by 15 potential victims with an exploitation location of Haringey in 2017, and four in 2018. The majority of potential victims were female (Table 4), with the most common type of exploitation stated as either sexual, domestic servitude or forced labour. Nine of the 19 cases reported in 2017/2018 were of unknown nationality, four were Ghanaian and three were Bulgarian.

Table 4, Potential victims of Modern Slavery that contacted the Modern Slavery Helpline and cited their place of exploitation as Haringey, by gender, 2017-2018

Year	Female	Male	Total
2017	12	3	15
2018	4	0	4
Total	16	3	19

Local police data shows a range of modern slavery offences in Haringey in the last two years (Table 5), although the offences are often not clearly linked to a specific borough

Table 5. Local police data showing numbers of modern slavery offences in Haringey, April 2017 to March 2019.

Crime type	April 2017 to March 2018	April 2018 to March 2019
Hold a person in slavery or servitude	4	3
Require a person to perform forced/compulsory labour	0	8
Arrange / facilitate travel of another person with a view to exploitation	2	1
Commit kidnap with intention of arranging travel with a view to exploitation	1	0
Total	7	12

Further information on modern slavery in Haringey can be found in the Modern Slavery Needs Assessment¹¹.



The National Referral Mechanism (NRM)In the UK, the National Referral Mechanism (NRM) is the national framework to identify, refer and record potential victims of modern slavery and provide government-funded support for victims.

Only specific agencies, known as ‘first responder organisations’, can refer into the NRM. These include the police, local authorities and specific voluntary community sector (VCS) organisations. Those identifying a potential case of modern slavery who do not work for any of these would make contact with a first responder organisation in order to begin the NRM process.

The range of first responder organisations, as well as the many practitioners across the borough who may come into contact with and play a role in referring potential victims, reflects the many organisations that have a role to play in responding to modern slavery and the need for collaborative working. This makes a strong case for establishing a more developed partnership approach to modern slavery in Haringey.

A full list of first responders can be found [here](#)¹².

¹² National referral mechanism guidance adult (England and Wales). Gov.UK.2020.
<https://www.gov.uk/government/publications/human-trafficking-victims-referral-and-assessment-forms/guidance-on-the-national-referral-mechanism-for-potential-adult-victims-of-modern-slavery-england-and-wales>

Legislation Context - The Modern Slavery Act 2015

The Modern Slavery Act, 2015 (the 'Act'), is the UK legislative framework for the national response to modern slavery.

Prosecution is central to the Act, which was designed to send a clear message to perpetrators that modern slavery will not be tolerated. This Act saw the maximum term for modern slavery offences increase to life imprisonment.

Under the Act, local authorities have a 'duty to notify' the Home Office of any individual they believe to be a victim of modern slavery, through an anonymous MS1 form. Information and guidance on the duty to notify can be found [here](#).

The Act requires some commercial organisations, who have an annual turnover of £36 million or more to publish an [annual modern slavery statement](#). This should include information on the companies' supply chains and the policies and procedures followed to prevent modern slavery. It is best practice for councils to publish their own modern slavery statement, something which Haringey will take forward as this plan develops.

The Act doesn't legally guarantee the support offer for victims, meaning that the status of victims and the role of some partners (including the voluntary and community sector (VSCS) and health) in supporting victims lacks clarity. The Home Office have recently released [guidance on supporting and identifying victims](#) which was required under Section 49 of the Act. Section 50 of the Act also gives the Government power to produce regulations on victim support, however it is unclear whether this power will be used.

A select group of charities are designated NRM first responders, this recognised the to the important role the VCS play, which is explored later in the plan [see page 16]

The Act requires the Government to make arrangements for the provision of [Independent Child Trafficking Advocates](#) (now called Independent Child Trafficking Guardians). The role of the ICTG is to "to assist, represent and support" children who show indicators of being, or possibly being, victims of trafficking. Currently, the scheme is being piloted in early adopter sites and yet to be rolled out nationwide.

The role of public health, which includes the Department of Health (DPH) and The Association of Directors of Public Health (ADPH) in addressing modern slavery is not fully articulated by the Modern Slavery Act.

The government has commissioned research that makes recommendations for how Public Health England (PHE), the Department of Health (DPH) and the Association of Directors of Public Health (ADPH) can play a greater role in the UK's response (details summarised [here](#)).

A coalition of third sector groups support the [Modern Slavery \(Victim Support\) Bill](#) which advocates for providing confirmed victims with a minimum of 12 months support and leave to remain. This Bill was produced to fill the gap in statutory support for victims of modern slavery.

Duty to notify guidance: <https://www.modernslaveryhelpline.org/learn-more/frontline-professionals/duty-to-notify>

Publish an annual modern slavery statement: <https://www.gov.uk/guidance/publish-an-annual-modern-slavery-statement>; Modern slavery and public health: <https://www.gov.uk/government/publications/modern-slavery-and-public-health/modern-slavery-and-public-health>; Modern Slavery (Victim Support) Bill Petition: <https://www.antisavery.org/take-action/campaigns/protect-not-neglect/>

3. Areas for Strategic Approach

a. Data & Intelligence

The Centre for Social Justice reports that: “the hidden nature of modern slavery means that building an accurate picture of the problem and its scale is a serious challenge”¹³. While we know that modern slavery is present in Haringey, we also recognise that there are significant gaps around our data and intelligence picture.

This presents a particular challenge when looking to understand the age, sex and ethnicity of victims, and impacts on our ability to identify victims and design appropriate support services.

What's already happening?

The council's Public Health team have produced a Modern Slavery Needs Assessment¹⁴, which pulls together all available data on modern slavery in the borough.

Available data gives some insight into the sex and number of victims; however, gaps remain for age and type of exploitation.

The needs assessment identifies that there is a need to collate data more effectively across the council and partners.

As noted earlier in this plan, 17 suspected victims were referred to the NRM in 2019. Through engagement with staff across the council it seems the number of referrals (as well as victims) could increase.

There are several contributing factors to low NRM referral numbers.

1. Victims going undetected due to poor understanding of the signs of modern slavery.
2. Lack of understanding on the behalf of the first responder about the NRM and referral process.
3. Unwillingness on the behalf of the victim to be referred to the NRM.

How can we improve our data on modern slavery?

Improving our intelligence picture in Haringey is vital to developing a coordinated and appropriate response to modern slavery in the borough.

Over the next 2 years, we need to think through and develop a plan to:

¹³ Centre for Social Justice, It Happens Here, London 2013, p.29. Available at:

<https://www.centreforsocialjustice.org.uk/library/happens-equipping-united-kingdom-fight-modern-slavery>



v4 Modern Slavery
Needs Assessment.d

¹⁴

- Collate and share intelligence between partners and across London Boroughs
- Use this intelligence to:
 - Improve the identification of victims and the places where modern slavery takes place
 - Design appropriate support services which promote recovery
 - Inform training and communication, with the aim of raising awareness and improving confidence and capacity to respond
 - Use data and intelligence to inform potential Social Return on Investment of tackling modern slavery in Haringey
 - Develop a performance monitoring template to capture key indicators and performance which includes strategic input from partners

Proposed actions to improve data on modern slavery could include:

- The Modern Slavery Co-ordinator to become the key contact for partners and council staff who wish to share intelligence - with an associated dedicated mailbox
- The Co-ordinator to be notified of all referrals into the NRM and where possible be informed on the conclusion of this process. This process could be similar to duty to notify.
- Work with the charity Unseen, who run the Modern Slavery Helpline, to understand the calls they receive in Haringey and what we can learn from this
- Use the strategic and operational group for modern slavery as a forum for discussion and intelligence sharing
- Implement data sharing protocols to ensure that the correct procedures are followed when sharing sensitive information across multi agencies (e.g. referrals)
- Development of a modern slavery dashboard to illustrate key data and intelligence relating to e.g. number of cases and variations over time
- Use data and intelligence to inform where to target campaign work and communications such as posters to highlight where support is available to victims of modern slavery
- Improve the dialogue with the Home Office and better utilise their published data, applying this where possible to Haringey
- Work closely with the Police National Modern Slavery Investigation Team, which responds to all crime reports generated by the NRM.

b. Awareness & Training

To uncover more cases of modern slavery and reduce its incidence, we need more people to be looking out for it – and to know what to look for. That means improving our access to information and providing targeted training to the public, practitioners, and voluntary sector.

How to identify modern slavery?

Modern slavery is recognised as a serious safeguarding concern and as such the signs to look out for are similar to those for other forms of exploitation and abuse, as listed on the Haringey Council [website](#)¹⁵:

- Bruises, falls and injuries
- Signs of neglect such as clothes being dirty
- Poor self-care
- Changes in someone's financial situation
- Changes in behavior such as loss of confidence or nervousness
- Isolation
- Being withdrawn

Specific guidance on spotting the signs of modern slavery is published by the Human Trafficking Foundation¹⁶, and Home Office¹⁷ and a summary of signs for teams in housing, health and work can be found in Appendix 2.

What's already happening?

Haringey council currently offer modern slavery awareness training to all staff in the organisation. These sessions run on a quarterly basis and are delivered by the Principle Adults' Social Worker using the ADASS training module. To date, over 100 officers have received the training.

The Bridge Renewal Trust (the council's VCS partner), provide a modern slavery e-learning module to community organisations and volunteers in the borough and the MET police are delivering modern slavery training to police officers.

How should we develop the training offer in borough?

The training delivered within the council focuses on improving awareness and identifying the signs of modern slavery. While feedback is largely positive, it is recognised that training could be contextualised to different council areas, taking

¹⁵ Safeguarding Adults- What is abuse? Haringey Council.2020. <https://www.haringey.gov.uk/social-care-and-health/safeguarding-adults#howcanyoutell>

¹⁶ Adult Modern Slavery Protocol for Local Authorities. Human Trafficking Foundation. 2019. <https://static1.squarespace.com/static/599abfb4e6f2e19ff048494f/t/5b164da11ae6cfbba8d27b36/1528188329682/LWG+Local+Authorities+Modern+Slavery+Protocol+%28adults%29+-+Identification+....pdf>

¹⁷<https://www.gov.uk/government/publications/modern-slavery-how-to-identify-and-support-victims>

into account the different ways they may come into contact with victims and places where modern slavery takes place.

These areas include:

- Housing and homelessness
- Councillors (who may hear complaints from residents about housing/businesses in their area)
- Migrant support services
- Procurement
- Customer services
- Safeguarding services (children and adults)
- Community Safety
 - Trading Standards
 - Environmental Health
 - Licensing

It is also recognised that specific training is needed for officers who could be directly involved in supporting victims and completing referrals to the NRM. This is to improve the rate of detection, to ensure the best possible support for victims and to prevent NRM referrals being rejected on grounds of poor evidence.

Partners agree that training should be joined up to improve consistency in both understanding and approach. This is something for development over the next two years and will be led by the council's modern slavery co-ordinator.

It is important to raise awareness within the community of modern slavery; encouraging individuals to report concerns and challenge their own consumer practice. We need to consider a model for training the community, raising awareness and signposting to information. Plans to deliver this will be explored through the strategic and operational group for modern slavery and we will work collaboratively to develop different, learning from the experience of partners.

Proposed actions to develop our training offer in Haringey, could include:

- Modern slavery awareness training to be delivered across all council services (e-learning module or face to face)
- Specific training for officers, working to support victims and distribute the opportunity for modern slavery to take place
- Specific training for identified officers who will be supporting victims of work to disrupt the for modern slavery to take place
- Utilising the available free training offer through The Children's Society and Hestia, which can be adapted for specific teams and organisations

c. Reporting Concerns

While increasing the identification of victims is key to our approach, we also need to have clear plans and procedures to act on intelligence.

Key to our approach will be publishing clear, accessible, and up to date information on where and how to report concerns about modern slavery and communicating these messages with partners, practitioners and the public.

Where to report concerns?

In an emergency, where there is immediate risk to life, always call **999** and then follow up with a specialist agency.

To raise and record suspicions and for information, advice and guidance on next steps:

- Call the [Modern Slavery Helpline](#) on 08000 121 700 (this service can be used by victims, the public and practitioners)
- Contact the Gangmasters and Labour Abuse Authority to report concerns about the mistreatment of workers on 0800 432 0804, or by email intelligence@glaa.gsi.gov.uk
- Contact the Police on 101 or Crimestoppers on 0800 555 111 (to report crime or share intelligence)
- Contact [Anti-Slavery International](#) or other [specialist anti-slavery organisations](#)
- Use the [Unseen](#) or [Stop the Traffik](#) reporting apps

Once you have sought initial advice,

- Contact the Nadia Burrell, Modern Slavery Co-Ordinator, via email and telephone (Nadia.burrell@haringey.gov.uk) and then,
- Call or email the Haringey First Response Team on 020 8489 1400/firstresponseteam@haringey.gov.uk to report a concern about an Adult
- Contact the Haringey Multi Agency Safeguarding Hub (MASH) on 020 8489 4470 to report a concern about a child (under 18)
- Out of hours- Call 0208 489 1000 (where you will be directed to the right team)

*A table of organisation specific contacts can be found in Appendix 3.

Modern Slavery Helpline: <https://www.modernslaveryhelpline.org/>

Anti-Slavery International: <https://www.antislavery.org/contact-us/>

Specialist Anti-Slavery Organisations: <https://www.app.college.police.uk/app-content/major-investigation-and-public-protection/modern-slavery/list-of-anti-slavery-charities-and-non-governmental-organisations/>

Unseen App: <https://www.modernslaveryhelpline.org/about/unseen-app>

Stop the Traffik App:

Modern slavery is a serious safeguarding concern, and as such when victims are identified the current response is to refer to the Haringey First Response Team in the case of adults, and Multi-Agency Safeguarding Hub (MASH) in the case of children.

The Modern Slavery Coordinator should be notified when a potential victim of modern slavery is identified.

How can we improve reporting?

It has been recognised that the response to modern slavery in Haringey varies significantly, depending who is identified and where.

Over the next 2 years, we need to develop a plan to improve access to information, which advises on where to report concerns. It is recommended that the modern slavery co-ordinator develops a toolkit of advice and information and clear pathways for sharing intelligence among partners. This will be available to download from the website and should be provided to and promoted among partners.

The Human Trafficking Foundation suggest that key specialists in each department with an understanding of the NRM process should be developed. It is common for NRM referrals to be refused due to mistakes in filling in the form. Having a dedicated specialist in each department would help reduce the number of unsuccessful applications.

It is also important to be aware of other available resources and the role they play in supporting Haringey's response. This includes the Modern Slavery Helpline and reporting apps delivered through Unseen and Stop the Traffik.

Training also has a key role to play in improving the reporting rate as well as general awareness raising of modern slavery.

d. Support for Victims

Victims of modern slavery are often deeply traumatised and vulnerable to re-exploitation, making the case for good and specialist support to promote recovery. This support should include safe accommodation, access to medical treatment and legal advice ¹⁸.

Whilst the Modern Slavery Act 2015 focuses largely on the prosecution of perpetrators, victim support is crucial to obtaining prosecutions. This is because victims may feel more able to give evidence against the perpetrators if they feel supported and safe¹⁹. The Government have produced guidance on identifying and supporting victims (under Section 49) and may well produce regulations on victim support (under Section 50).

In terms of the accessibility and funding of support, there are distinct differences between adults and children and for those with different immigration status, including those with no recourse to public funds (NRPF). It is important to recognise this, continue to build our intelligence picture and offer support that reflects a range of different experiences.

Current approach

Across the UK and in Haringey, support for victims of modern slavery is provided through:

- Existing council and partner safeguarding procedures
- The National Referral Mechanism (NRM) and Victim Care Contract (VCC)
- Local and national charities

Over the next 2 years, there is a need to define a clear support offer for victims, considering a range of different needs and experiences, including for children, adults and those with no recourse to public funds (NRPF).

It is important that as well as a clear pathway into the NRM, there is a clear post-NRM pathway of support for victims in Haringey.

The National Referral Mechanism (NRM)

The NRM is the current process in place in the UK for victim identification and support. Haringey is a **first responder** into the NRM process and has a **duty to notify** the Home Office if anyone working within the council identifies a potential victim of modern slavery.

¹⁸ Survivor Alliance. 2020. Victim Support

¹⁹ House of Commons, Home Affairs Committee, Oral evidence: Modern Slavery HC1460, 2018, Q115, <http://data.parliament.uk/writtenevidence/committeeevidence.svc/evidencedocument/home-affairs-committee/modern-slavery/oral/92346.pdf>

As a system of support the National Referral Mechanism (NRM) is recognised as having both benefits and challenges (summarised in appendix 5).

The below table outlines some of the challenges Haringey Council needs to address to support victims of modern slavery in the borough.

Need	Response
Referral to the NRM	Haringey will establish a Special Point of Contact (SPoC) in each department to refer potential victims (PVs) encountered by their department to the NRM. The Modern Slavery Coordinator should be notified of any referral and will assist with the process.
Recommending the NRM	<p>Adult. Haringey will recommend the NRM to all adult PVs and explain the benefits of entering.</p> <p>Child. All child PVs will be referred to the NRM.</p>
Support for those who do not consent to enter the NRM	<p>Adult. PVs who do not enter the NRM can be extremely vulnerable. We will carry out a risk assessment of the PV's situation and ensure they have support and safe space to stay.</p> <p>We will complete an duty to notify form and send to the Home Office.</p> <p>(Note: one study found that three fifths of victims agreed to be referred to the NRM after 6 weeks of information, support and reassurance they were safe)²⁰</p>
Support for those after referral and before a Reasonable Grounds (RG) decision	<p>Adult. A risk assessment should be carried out within the first 24 hours, and immediate needs of the PV must be met. Accommodation must be provided for the PV in which they feel safe.</p> <p>It can take on average 14 days for an RG to be made and the Salvation Army</p>

²⁰ Human Trafficking Foundation, Adult Modern Slavery Protocol for Local Authorities

	<p>(victim care contract holder) has no obligation to provide accommodation.</p> <p>Child. At point of contact the child should be referred to child safeguarding services. Child protection processes should continue to take place regardless of subsequent decisions made through the NRM</p>
<p>Support for victims with a negative Reasonable Grounds or Conclusive Grounds (CG)</p>	<p>Adult. Haringey will conduct a risk assessment of the PV's situation and ensure they have support and safe space to stay. The PV will still possibly possess some or all of the vulnerabilities they had prior to NRM referral.</p> <p>If we or the PV believe the negative decision made by the SCA is incorrect, we will submit a reconsideration request. If a reconsideration request has not been made and no extension request has been submitted, the PV will leave support provided under the Victim Care Contract within 9 working days.</p> <p>Child. Where a negative decision is reached, we will revert to our normal child protection assessments to identify what support is needed for the child.</p>
<p>Support for victims post NRM</p>	<p>Adult. If a victim returns to the borough post-NRM their needs should be re-assessed.</p> <p>Haringey will contact key agencies including Housing/Homelessness teams, Adult Social Care, Jobcentre Plus and GP surgeries so the victim can have fast-tracked access to financial support, housing and medical support.</p> <p>Child. The support we provide to child victims is not dependent on a child remaining in the NRM. As such, children will continue to be supported in their existing situation by Haringey under our statutory duty to safeguard</p>

	and promote the welfare of looked after children in their area.
Ensure there is clear multi-agency communication	<p>A Multi Agency Case Conference will identify the recourses and actions needed to meet the needs of victims of modern slavery in Haringey.</p> <p>Modern Slavery Coordinator is the link between different departments and agencies on modern slavery implementation and performance.</p>
Learning and sharing information to understand and improve the NRM	<p>Haringey will collect data on the support pathway of victims and support outcomes. This can be used to understand the suitability of the current process and where it can be improved.</p> <p>The Modern Slavery Coordinator will liaise with the Home Office and other Modern Slavery groups to ensure Haringey's victim support practice is up to date.</p>

Alternative Support

There is a need to provide support to victims who do not enter the NRM, or who enter and are given a negative reasonable or conclusive grounds decision.

Over the next 2 years, the council will work partners to develop an agreed support offer, recognising the important role the VCS have to play within this.

There are many specialist charities and support services in the UK where victims or those at risk from modern slavery can access advice and support. These have been mapped by The Human Trafficking Foundation²¹ and it is recommended that a more localised directory of support services is developed.

²¹Modern Slavery Support Services <https://www.humantraffickingfoundation.org/support-services>

e. Disruption, Prosecution and Procurement

The UK Modern Slavery Strategy emphasises the importance of disruption activity in responding to modern slavery and recognises the importance of close collaboration between the Home Office, police, and local authorities in achieving this.

The police and the council are already in dialogue about how we can work together to develop a coordinated response to modern slavery which supports victims and criminal investigations. We recognise that this conversation needs to include wider partners and work with both local police and national specialist police agencies.

The below table makes recommendations on how we can work together to disrupt opportunities for modern slavery to occur, recognising the important role the police play in prosecuting perpetrators and acting upon intelligence.

A list of the available regulatory powers for councils which may prove useful in disrupting modern slavery can be found [here](#)²².

Recommended Actions		
Housing	Health	Work
<ul style="list-style-type: none"> For the council to create a mandate for Housing Enforcement Officers who are inspecting properties to look for signs of modern slavery and work jointly with the police and modern slavery co-ordinator to act upon this. Community safety enforcement officers work with Homes for Haringey and the police to target properties that are suspected of being used for modern slavery. It is important that this work is aligned to services who offer support for victims found such as Brining Unity Back into 	<ul style="list-style-type: none"> Haringey to work with Islington and Enfield Clinical Commissioning Groups (CCG), to provide a consistent training and approach when responding to concerns identified at the North Middlesex and Whittington Hospitals. Modern slavery co-ordinator to develop partnerships and share information with Haringey based GPs, ensuring there are clear 	<ul style="list-style-type: none"> For the council to create a mandate, whereby trading standards officers look for signs of modern slavery and report any suspicious activity immediately to the modern slavery co-ordinator or police. Proactive inspections should target high-risk industries and businesses, including construction, beauty and nail

²² Tackling modern slavery, a council guide. Local Government Association.2017.
https://local.gov.uk/sites/default/files/documents/22.12_Modern_slavery_WEB%202.pdf, p34

<p>the Community (BUBIC).</p> <ul style="list-style-type: none"> • Licenses issued to Houses in Multiple Occupation (HMO) to be displayed and include a section written in Albanian and Vietnamese (the most common source countries for trafficking) making it clear that exploitation is illegal and which signposts to emergency services and the modern slavery helpline. • Housing associations to proactively look out for signs of modern slavery in their properties and report concerns to the police or modern slavery co-ordinator 	<p>communication channels to assist referrals into the NRM, where this is felt to be appropriate.</p> <ul style="list-style-type: none"> • Information on modern slavery including available training to be shared via the Association Director of Public Health (ADPH) Network, who are co-located with Haringey Public Health. 	<p>salons, car washes, and others.</p> <ul style="list-style-type: none"> • Modern slavery co-ordinator to work with colleagues within regeneration and business network to raise awareness within this area.
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Council Procurement

Understanding the Council’s supply chains and assessing the risk to those working within them is an important part of our response to modern slavery and requires support and collaboration from across teams and partners.

As a council, we are signed up to the Cooperative Party Charter Against Modern Slavery²³. This enhances our responsibility to ensure that supply chains in the borough are free from modern slavery and formally recognises the important role businesses have to play in developing a borough wide response.

To develop this approach further, it is recommended that:

- The council publish a modern slavery statement, responding to best practice guidance from the LGA
- A modern slavery clause is included within all contract templates as standard

²³ <https://party.coop/local/councillors/modern-slavery-charter/>

- We work with businesses in the borough to make sure they understand their role in responding to modern slavery and responsibility to publish a modern slavery statement

f. Community Engagement

To effectively tackle modern slavery in Haringey, partnership with the voluntary and community sector (VCS) is essential. Any partnership should be based on an understanding that the process of establishing a framework to identify and support victims of modern slavery will require communication and feedback. There is also recognition that the approach to responding to modern slavery in Haringey needs to take an agile and iterative approach, embedding flexibility into strategic and operation activity.

Engagement with a range of VCS partners, both local and national has helped to shape the main priority areas community engagement should focus on these being; identifying victims, referring to the NRM, and providing wider support. A summary of engagement responses can be found in Appendix.6

Spotting the signs

Through engagement with a range of VCS partners, it has been identified that confidence levels of identifying the signs of modern slavery vary significantly. Those organisations working specifically with victims of modern slavery are unsurprisingly more confident in identifying victims, whereas other organisations were less confident.

There was general sentiment that awareness throughout the borough was low, and more modern slavery training would be appreciated. This includes raising awareness of suspicious circumstances and how to report concerns. It is recognised that awareness needs to be raised across the partnership, including within the council.

Referring to the NRM and other support services

There is a need to provide VCS organisations and the wider community with the information need to offer support to a potential victim. Part of this work will be to share a clear referral pathway with key points of contact across the partnership.

Providing support to victims

Any partnership should make use of the services provided by voluntary sector organisations, and flag the services provided by Haringey Council. Organisations expressed that Haringey Council must work to ensure victims feel supported and welcomed.

Recommended actions

1. Offer training to spotting the signs of modern slavery to key voluntary sector partners.
2. Consider a communications campaign to raise awareness of modern slavery throughout the borough once the referral pathway has been finalised.
3. Share referral pathway with voluntary sector partners.
4. Create clear network of services offered to victims throughout Haringey, allowing providers to direct victims to the services they require.

g. Responding to Covid-19

The Coronavirus pandemic has had significant implications for global health and security, and these implications extend to modern slavery. There are major risks faced by both those currently being exploited and those vulnerable to exploitation.

Risks for those currently in modern slavery²⁴

Victims of modern slavery are already at risk of exclusion from adequate healthcare, and the pandemic increases the risk of exclusion. Many victims will be forced to continue working in dangerous environments without access to Personal Protective Equipment (PPE) or adequate sanitation.

Survivors of modern slavery also face heightened risk, as they often rely on government and charity accommodation. There is a risk that with Government focus on Covid-19 and charities facing financial difficulties, that quality of survivor care could deteriorate.

Risk of those vulnerable to modern slavery²⁵

The pandemic has exacerbated unemployment and job insecurity, leaving many vulnerable to exploitation. Poverty and financial problems are major contributors to modern slavery, as they push people towards risky labour market decision, which heightens the risk of exploitation.

Proposed actions for Haringey:

- Monitor developments, research, and data on the impact on Covid-19 on victims of modern slavery
- Ensure that support for victims of modern slavery remains a priority
- Consider working with Haringey's enforcement team to ensure strong regulation of working conditions in businesses in the borough. This could be done through awareness of modern slavery through e-resources/training.
- Work with the Housing Related Support (HRS) team to ensure potential victims who are homeless or rough sleeping have access to clean, safe and secure housing

²⁴ Delta 8.7, The Impact of COVID-19 on Modern Slavery <https://delta87.org/2020/03/impact-covid-19-modern-slavery/>

²⁵ Ibid

Governance and Delivery

Haringey prides itself on being a welcoming borough, which aims to ensure people feel safe, happy and able to fulfil their potential. While modern slavery is a complex issue often perpetrated across international boundaries, the council and partners have a crucial role to play in identifying, safeguarding and supporting vulnerable victims, preventing opportunities for modern slavery to occur and raising awareness of an often-invisible crime at local level.²⁶

Our approach to modern slavery will be delivered in partnership, recognising that no one organisation has the knowledge, skills or resources to respond in isolation. A list of partner organisations include their role and can contacts can be found in Appendix.3

Figure 3. Haringey Modern Slavery Partnership



Delivery

²⁶ Tackling Modern Slavery: A Council Guide. The Local Government Association. December 2017. <https://www.local.gov.uk/modern-slavery-council-guide>

To support the delivery of agreed work, the council has recruited a dedicated Modern Slavery Co-Ordinator. The person in this role will be key to delivering this plan and working with partners to strengthen awareness of and responses to modern slavery across the borough.

Key responsibilities will include:

- Awareness raising
- Delivering information, guidance and training for practitioners and community groups
- Coordinating data from across the council and partners
- Developing relationships with partners
- Developing an action plan (from this plan) to implement work

Governance

- The multi-agency strategic and operational group for modern slavery, chaired by the Director of Public Health will provide the main governance structure for work on modern slavery over the next 2 years.
- Work will also report into the Haringey Community Safety Partnership and Health and Wellbeing Board.

4. Appendices

Appendix 1. Current Activity around Modern Slavery in Haringey

Haringey Council: Current Activity around Modern Slavery	
Modern Slavery Co-Ordinator	<p>The Council has recruited a designated modern slavery co-ordinator. This role sits in Public Health and is closely aligned with existing work on ending Violence Against Women and Girls (VAWG).</p> <p>The role will be key in developing relationships with partners, delivering training to staff and practitioners and coordinating data to inform our intelligence picture in the borough.</p> <p>The role will work with partners to establish more defined referral pathways to improve victim support. The role will also improve community engagement to enhance understanding of modern slavery and increase referrals.</p>
Strategic and Operational Group	<p>The Council has set up a Strategic and Operation Group for Modern Slavery, which is chaired by Chantelle Fatania, Public Health Consultant.</p> <p>The purpose of the group is to oversee a partnership response to the issue of modern slavery in Haringey.</p> <p>The group has membership from across the council; housing, health, procurement, children's, adults, community safety and commission as well as partners from the VCS, Police and the NHS.</p>
Training	<p>Awareness raising training has been delivered by the Principle Social Workers to staff into Adult Social Care. This training has been developed by London ADASS, London MET and the NHS and follows a 'train the trainer' model.</p> <p>The training covers:</p> <ul style="list-style-type: none"> - Human trafficking and modern slavery definitions and criteria including case studies - The Modern Slavery Act - Spotting signs of modern slavery (indicators and signs), - Identification and provision (including NRM), - Internal and multi-agency responses <p>There is aspiration to scale up the Councils training offer, extending this to partners and community groups.</p>

<p>Member of the Co-Operative Charter Against Modern Slavery</p>	<p>In 2019 the Council is signed up to the Co-Operative Parties Charter Against Modern Slavery.²⁷ This commits councils to proactively vetting their own supply chain to ensure no instances of modern slavery are taking place and to report annually on process.</p> <p>Work is needed to implement the charter and update on progress monitoring. This work will be led by the Modern Slavery Co-Ordinator.</p>
<p>Public Health: Modern Slavery Needs Assessment</p>	<p>Public Health have undertaken a modern slavery needs assessment, which outlines public health responsibilities and coordinated available data in the borough.</p>
<p>Member of the London Modern Slavery Co-Ordinator Network</p>	<p>Haringey is a member of the London Modern Slavery Leads Network. This is coordinated by the Human Trafficking Foundation and works to share best practice and coordinate a partnership response across London.</p> <p>The Modern Slavery Co-Ordinator will attend and feed into the group, using this as an opportunity to develop pan-London partnerships.</p>
<p>Online Information for Residents</p>	<p>Information from the Governments 'Modern Slavery is Closer than You Think' is available on the Haringey Website. Development of posters and flyers to support victims of modern slavery for dissemination in GP surgeries.</p>

²⁷ Co-Operative Party: Modern Slavery Charter. 2020. <https://party.coop/local/councillors/modern-slavery-charter/>

Appendix 2.

Signs of Modern Slavery- Adapted from Human Trafficking Foundation Guidance

Housing	Health	Work
<ul style="list-style-type: none"> • Crammed/rough sleeping conditions • Cars or minibuses picking up at unusual times • No private sleeping space • Lack of family photos or personal belongings • Post stacked up and discarded envelopes on the floor • Scripts by the telephone • Unable to show any autonomy over the accommodation, e.g. no bills or tenancy agreement 	<ul style="list-style-type: none"> • Sign of physical or sexual abuse and/or has contracted STIs or has an unwanted pregnancy • Not registered with a GP practice • Late presentation to maternity services • Malnourished • Mental ill health occurs frequently in survivors of modern slavery²⁸; e.g. trauma, PTSD, panic attacks • Work related injuries often through poor health and safety • Drug/alcohol dependency • Broken bones that haven't health properly 	<ul style="list-style-type: none"> • Wearing unsuitable clothing e.g. flipflops in winter, no helmet of a construction site • Poor health and safety equipment, unhygienic and unsafe working conditions • (Perception of) debt bondage • Employers unable to produce the correct documents for migrant workers

²⁸ The Helen Bamber Foundation and the Freedom Fund, Addressing Mental Health Needs In Survivors Of Modern Slavery A Critical Review and Research Agenda, 2015 <http://www.helenbamber.org/wp-content/uploads/2015/07/2015-Addressing-the-Mental-Health-Needs-in-Survivors-of-Modern-Slavery.pdf>

Appendix 3. Reporting Concerns and the Role of Partners

Partner	Role	Key Contacts
Haringey Council	<ul style="list-style-type: none"> • NRM first responder • Bringing partners together through a modern slavery strategic and operational group • Identifying and supporting victims, through a robust safeguarding response • Raising awareness, both within the council and wider community • Disrupting opportunities for modern slavery to take place • Ensuring the council supply chains and those of businesses in the borough are free from modern slavery 	<ul style="list-style-type: none"> • Modern Slavery Co-Ordinator, Haringey Public Health • Adults First Response Team: 0208 489 1400 • Children’s Multi Agency Safeguarding Hub (MASH): 020 8489 4470 • Chris Atherton: Principle Adult’s Social Worker and Modern Slavery Training Lead: Chris Atherton • Pauline Morris: Principle Social Worker Children’s
Homes for Haringey	<ul style="list-style-type: none"> • NRM first responder • Identifying victims • Supporting victims, through access to emergency accommodation • Signposting to support services 	<ul style="list-style-type: none"> • Chinyere Ugwu: Community and Customer Relations Director • Beverley Faulkner: Housing Needs Manager • Hyacinth Foster: Employment and Social Regeneration Manager
The Police	<ul style="list-style-type: none"> • NRM first responder • Leading on disruption and prosecution activity • Support victims • Sharing and coordinating intelligence • Delivering the pan-London Project Enterprise, modelled on Programme Challenger in Manchester²⁹ 	<ul style="list-style-type: none"> • Joe Derilo: Haringey Police Safeguarding Lead 02071616669/07795845227 Joe.Derilo@met.police.uk • Clare Barnes: Vulnerability Assessment and Partnership Team, Central Specialist Crime Claire.Barnes2@met.police.uk 02072308148/07557 834247 • Chirs Maby: Police National Modern Slavery Transformation Unit Christopher.MABY@devonandcornwall.pnn.police.uk ModernSlavery@devonandcornwall.pnn.police.uk 07740 911729

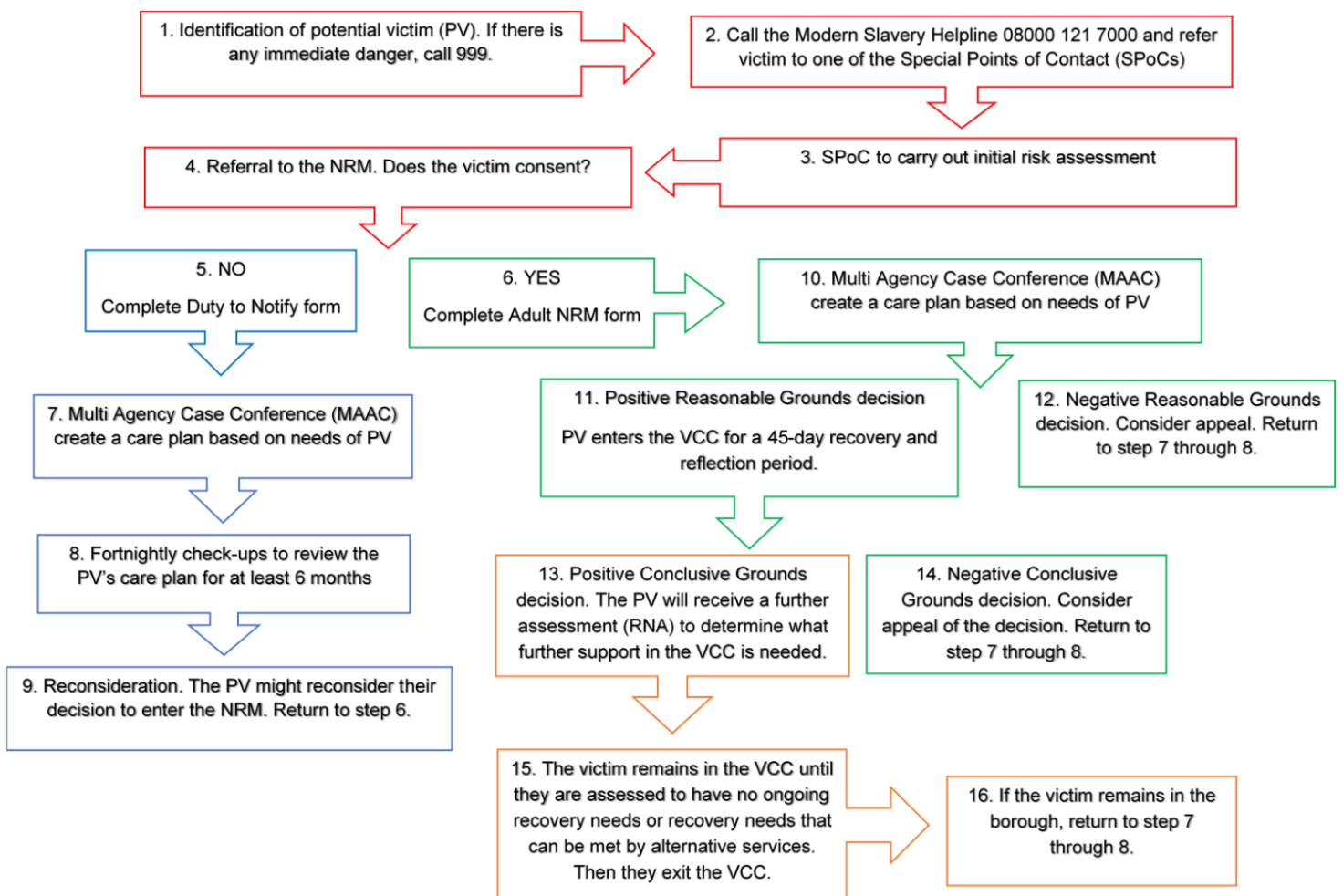
²⁹ Programme Challenger.2020. https://www.programmechallenger.co.uk/what_we_do/modern_slavery/

Third Sector/National Charities	<ul style="list-style-type: none"> • Providing support to victims, especially for those with no-recourse to public funds (NRPF) • Offer guidance, support and expertise for practitioners • Some charities are first responders into the NRM, these are: <ul style="list-style-type: none"> -Salvation Army -Migrant Help -Medaille Trust -Kalayaan -Barnardo's -Unseen -Tara Project (Scotland) -NSPCC -VAWSO -New Pathways -Refugee Council 	The Human Trafficking Foundation have developed a national directory of support services, which can be found here . ³⁰
Local Voluntary Community Sector	<ul style="list-style-type: none"> • Raising awareness of modern slavery • Signposting to appropriate services and sources of information and advice (service directory) 	https://www.bridgerenewaltrust.org.uk/
The Community	<ul style="list-style-type: none"> • Identifying victims and perpetrators of modern slavery • Limiting opportunities for modern slavery to take place through challenging individual consumer practice 	
Businesses and Commercial Organisations	<ul style="list-style-type: none"> • Ensuring supply chains are free from modern slavery • Promoting ethical consumer practice 	https://www.haringey.gov.uk/business/advice-and-support/traders-groups
NHS	<ul style="list-style-type: none"> • Identifying victims who present to primary care settings • Supporting victims through the provision of health care 	<p>Angela Sealy: Safeguarding Lead, Haringey Clinical Commissioning Group (CCG)</p> <p>Sarah Pope: Safeguarding Lead, North Middlesex Hospital Sarah.pope5@nhs.net</p> <p>Theresa Renwick: Safeguarding Lead, Whittington Theresa.renwick@nhs.net</p>

³⁰ Modern Slavery Support Services.2020. Human Trafficking Foundation.
<https://www.humantraffickingofoundation.org/support-services>

Home Office	<ul style="list-style-type: none"> Responsible for running and referring into the NRM Recording and collating national intelligence 	
Local Government Association	<ul style="list-style-type: none"> Sharing guidance and best practice to local authorities Facilitating partnership working 	<p>Ellie Greenwood: Ellie.Greenwood@local.gov.uk Leading on work to explore how local authorities can best response to modern slavery.</p>

Appendix 4. Haringey referral pathway



Appendix 5. Benefits and challenges presented by the National Referral Mechanism (NRM)

Benefits	Considerations
<ul style="list-style-type: none"> Formally recognises a person as a victim of modern slavery (on receiving a positive conclusive ground decision). <ul style="list-style-type: none"> ➤ This can support a Section 45 defence³¹, which is becoming increasingly relevant for young people involved in county lines. 	<ul style="list-style-type: none"> The NRM provides no tangible support offer for children. Children need to be supported through existing safeguarding procedures and looked after children offer from within the local authority. <p>However, there is a legal duty to refer all potential child victims into the NRM.</p>
<ul style="list-style-type: none"> Helps to improve the UK data and intelligence picture about modern slavery, with this helping to develop and define the support offer for victims. 	<ul style="list-style-type: none"> Once a referral has made into the NRM, there is an up to 5 day wait period for a reasonable ground's decision. During this time, there are no clear assurances to the potential victim about accommodation and support. <p>Work is needed to define Haringey's support offer during this 5-day time period.</p>
<ul style="list-style-type: none"> For Adults the NRM provides a tangible support offer for victims who receive a reasonable ground decision after 5 days. The support offer may include: <ul style="list-style-type: none"> -Safehouse accommodation -Outreach worker support -Legal advise -Healthcare 	<ul style="list-style-type: none"> Those referred in to the NRM, who are not UK nationals are unable to work during time in support services.
<ul style="list-style-type: none"> Starts a dialogue between the victim and perpetrators and provides a clear system for submitting evidence to the police to assist in the prosecution of perpetrators 	<ul style="list-style-type: none"> Some victims may not feel comfortable sharing data and intelligence with the police and entering a system run by the Home Office. This may be due to a lack of trust with the authorities and concerns over deportation where a victim does not have settled status.
<ul style="list-style-type: none"> Initiates a Police investigation. Every submitted NRM generated a crime report which goes to the MET's central intelligence team. 	<ul style="list-style-type: none"> Lack of clarity over what happens when a person leaves the NRM
	<ul style="list-style-type: none"> A lack of feedback on why a person may receive a negative reasonable or conclusive ground decision from the NRM, which prevents future learning and change to better support vulnerable victims.

³¹ The Modern Slavery Act, 2015- Section 45. <http://www.legislation.gov.uk/ukpga/2015/30/section/45/enacted>

Appendix 6.

Responses for VCS engagement session:

Question	Response
<p>In answer to the question ‘how confident do you feel in recognising the signs of modern slavery?’ the group answered as follows:</p>	<p><i>Fairly confident 38%</i> <i>Completely confident 25%</i> <i>Somewhat confident 25%</i> <i>Not confident at all 13%</i></p>
<p>In answer to the question ‘If you identify a potential victim of modern slavery, who would you seek help from and refer this to?’ the group answered as follows:</p>	<p><i>Police 50%</i> <i>Local council 50%</i> <i>NRM 50%,</i> <i>National Charities 38%</i> <i>Other 25%</i></p>
<p>In answer to the question ‘In the past 12 months have you provided any of the following support service to potential victims?’ the group answered as follows:</p>	<p><i>Legal advice 38%</i> <i>Mental Health and wellbeing support 13%</i> <i>Education & Training 13%</i> <i>Other 13%</i> <i>None of the above 25%</i></p>