

# Haringey Modern Slavery Plan

## March 2024

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# 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 and Intelligence
- Awareness and Training
- Reporting concerns
- Support for Victims
- Disruption, Prosecution and Procurement
- Community Engagement
- The cost-of-living crisis.

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).

This plan sets out our approach on how we will 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 that people living, working and visiting Haringey feel welcome, safe and free from harm and are committed to working in collaboration to achieve this.

## 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 freedom<sup>1</sup>.

**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<sup>2</sup>. 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 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.

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<sup>1</sup> Unseen, [www.unseenuk.org/about/the-problem/modern-slavery](http://www.unseenuk.org/about/the-problem/modern-slavery)

<sup>2</sup> International Labour Organisation, [https://www.ilo.org/global/topics/forced-labour/news/WCMS\\_237569/lang-en/index.htm](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 an reported trafficking victims in the UK are victims of sexual exploitation.

### **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.

### **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 faking place in the UK are male.

### **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. 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.

### **Other forms of exploitation**

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

## 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 136,000<sup>3</sup>. The cost of modern slavery is estimated to be between 3.3 and 4.3 billion<sup>4</sup>.

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
<b>Total</b>	<b>£0.31m</b>	<b>£409.8m</b>	<b>£71.1m</b>	<b>£10.5m</b>	<b>£19.0m</b>	<b>£88.9m</b>	<b>£599.5m</b>

The total costs of suspected victims of modern slavery by category<sup>5</sup>. 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 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 certain VCS organisations. Those identifying a potential case of modern slavery who do not work for any of these would contact 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.

In 2023, the NRM received 17,004 referrals of potential victims of modern slavery nationally which was similar to the previous year when there were 16,921 referrals.

<sup>3</sup> The Global Slavery Index, United Kingdom, <https://www.globalslaveryindex.org/2018/findings/country-studies/united-kingdom/>

<sup>4</sup> 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](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/729836/economic-and-social-costs-of-modern-slavery-horr100.pdf)

<sup>5</sup> Ibid, page 25

In actual fact, 2023 had the highest number of referrals since the NRM began in 2009<sup>6</sup>.

In 2023, 76% (n=12,903) of referrals were male and 24% (n=4,088) were female. These proportions have remained stable, although male potential victims have formed an increasing proportion of NRM referrals over the years.

Of the potential victims in 2023, 49% (n=8,377) claimed exploitation in the UK only compared to 47% in the prior year. Thirty-six percent (n=6,163) claimed that they were exploited overseas compared to 40% in the prior year. Furthermore, of all of the referrals in 2023, 51% (n=8,622) were adults and 44% (n=7,432) were children. The remaining 6% (n=950) of exploitation cases were reported as unknown<sup>7</sup>.

The most common nationality referral to the NRM was UK, who accounted for 25% (n=4,299) of all potential victims, followed by Albanian (24%, 4,052) and then Vietnamese (6%; 991). The majority (78%; 3,350) of UK nationals were child potential victims, whilst most Albanian nationals (78%; 3,147) were adult potential victims. For Vietnamese nationals, 61% (n=601) were adult potential victims and 30% (n=302) were child potential victim<sup>8</sup>.

County lines is used to describe drugs gangs in large cities expanding their reach to small towns, through exploiting individuals to transport substances<sup>9</sup>. In 2023, 1,559 county lines referrals were flagged accounting for 9% of all referrals received in the year. The majority (74%, 1,158) of these referrals were for male children.

## Local Context

In Haringey in 2023, **25 people were referred to the NRM.**

In Haringey, more children are referred to the NRM than adults. In 2023, 23 of the referrals were for children (17 years or under) and two were for adults. This could suggest that child exploitation is more common than adult exploitation, or that child exploitation is more likely to be found and reported.

The number of people referred as potential victims of modern slavery in Haringey has varied in recent years, peaking at 49 in 2020<sup>10</sup>, as illustrated in the figure below.

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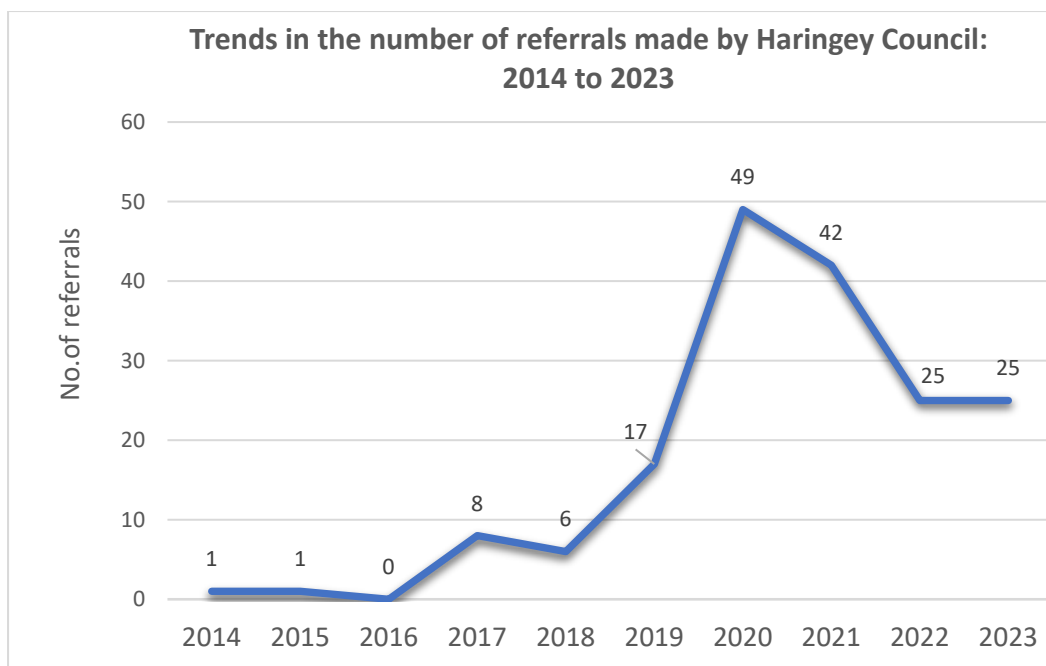
<sup>6</sup> Home Office statistics for 2023: [Modern Slavery: National Referral Mechanism and Duty to Notify statistics UK, end of year summary 2023 - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/statistics/modern-slavery-national-referral-mechanism-and-duty-to-notify-statistics-uk-end-of-year-summary-2023)

<sup>7</sup> Home Office statistics for 2023

<sup>8</sup> Home Office statistics for 2023

<sup>9</sup> Home Office statistics for 2023

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



Year	No. of adults (18 and over)	No. of minors (17 or under)	Total
2023	2	23	25
2022	3	22	25
2021	7	35	42
2020	4	45	49
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

Breakdown of the number of potential victims in Haringey referred to the NRM since 2014 broken down by adults and children. Source of data: NRM

Across North Central London (NCL) in 2023, the total number of NRM referrals by first responder (local authority) was 178. Enfield (n=47) had the highest number of total referrals, accounting for a quarter of all the referrals across NCL and Haringey (n=25), the fewest. The variations evident across NCL could be due to differences in the awareness and understanding around modern slavery cases in each borough or in relation to the requirements to refer to the NRM.

Local Authority	No. of adults (18 and over)	No. of minors (17 or under)	Unknown	Total
Barnet	1	35	0	36
Camden	3	33	1	37
Enfield	11	36	0	47
Haringey	2	23	0	25
Islington	2	30	1	33
<b>NCL Total</b>	<b>19</b>	<b>157</b>	<b>2</b>	<b>178</b>

Number of potential victims of referred to the NRM in NCL in 2023. Source of data: NRM



## 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 VCS and health) in supporting victims lacks clarity. The Home Office have 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.

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.

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 the Office for Health Improvement and Disparities (OHID), the Department of Health (DPH) and the Association of Directors of Public Health (ADPH) can play a greater role in the UK's response.

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.antislavery.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”<sup>11</sup>. While we know that modern slavery is present in Haringey, we also recognise that there are some 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.

#### **Factors contributing to low NRM referrals in Haringey**

The factors contributing to low NRM referral numbers in Haringey are as follows:

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

#### **What opportunities exist to improve and utilise our data on modern slavery?**

Improving our intelligence base is essential to developing a coordinated and an appropriate response to modern slavery. **Over the next two years, key actions are:**

1. **To develop our understanding of how other local authorities in London are responding to cases of modern slavery and human trafficking based on the data and intelligence which they have obtained on incidents and offences.**
2. **To improve our dialogue with the Home Office and better utilise their published data, applying this where possible to understand the geographical patterns of modern slavery cases in Haringey.**
3. **Community Safety to continue working with the Police National Modern Slavery Investigation Team who respond to all crime reports generated by the NRM.**

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<sup>11</sup> 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>

## b. Awareness and 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 VCS.

### 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](#)<sup>12</sup>:

- 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 Foundation<sup>13</sup>, and Home Office<sup>14</sup>.

### What's already happening?

Training was previously delivered by a Modern Slavery Co-ordinator recruited into post in 2020/21. This training was disseminated on YouTube and can be accessed through the following link: [Modern Slavery Training - YouTube](#)

Training on raising awareness on modern slavery and human trafficking is presently delivered by staff in Adult Social Care. The aim of this training is to increase the number of staff who are able to recognise, and report suspected cases of modern slavery.

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 Metropolitan police are delivering modern slavery training to police officers.

### How could we develop the training offer in borough?

Training delivered within the council focuses on improving awareness and identifying the signs of modern slavery. While feedback is generally positive, it is

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<sup>12</sup> Safeguarding Adults- What is abuse? Haringey Council.2020. <https://www.haringey.gov.uk/social-care-and-health/safeguarding-adults#howcanyoutell>

<sup>13</sup> 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>

<sup>14</sup><https://www.gov.uk/government/publications/modern-slavery-how-to-identify-and-support-victims>

recognised that training could be contextualised to other council areas, considering the different ways they may come into contact with victims and places where modern slavery takes place. Other 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

Furthermore, it is 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.

It is important to raise awareness within the community of modern slavery; encouraging individuals to report concerns and challenge their own consumer practice. The adults and children's safeguarding boards are committed to raising awareness of modern slavery and human trafficking across Haringey.

**Key action: Training continues to be offered to front-line staff to support with the identification of the signs of modern slavery and on the follow up reporting process through the NRM.**

## 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.

**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](mailto: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,

- Call or email the Haringey First Response Team on 020 8489 1400/  
[firstresponseteam@haringey.gov.uk](mailto: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)

### Current approach?

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.

### How can we improve reporting?

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

Specialists in the organisation known as “Special Points of Contact” (SPoCs) have been identified in Adults and Children’s Services. Having a dedicated specialist in these departments will help to reduce the number of unsuccessful applications and improve the robustness of reporting processes overall.

It is important to be aware of other available resources and the role they play in supporting Haringey’s response to modern slavery. Other resources include the Modern Slavery Helpline and reporting apps delivered through Unseen and Stop the Traffik.

#### 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<sup>15</sup>.

Whilst the Modern Slavery Act 2015 focuses 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 safe<sup>16</sup>. 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 NRM and Victim Care Contract (VCC)
- Local and national charities

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.

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<sup>15</sup> Survivor Alliance. 2020. Victim Support

<sup>16</sup> 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>

## The 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.

As a system of support, the NRM is recognised as having both benefits and challenges. The table below outlines some of the challenges Haringey Council needs to address to support victims of modern slavery in the borough.

Need	Response
<b>Referral to the NRM</b>	Haringey has established a SPOC in adults and children’s services to refer potential victims encountered by their department to the NRM.
<b>Recommending the NRM</b>	<b>Adult.</b> Haringey will recommend the NRM to all adult potential victims and explain the benefits of entering. <b>Child.</b> All child potential victims will be referred to the NRM.
<b>Support for those who do not consent to enter the NRM</b>	<b>Adult.</b> Potential victims who do not enter the NRM can be extremely vulnerable. We will conduct a risk assessment of the victim’s situation and ensure they have support and a safe space to stay.  We will complete a duty to notify form and send to the Home Office.  (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) <sup>17</sup> .
<b>Support for those after referral and before a reasonable grounds’ decision</b>	<b>Adult.</b> A risk assessment should be conducted within the first 24 hours, and immediate needs of the potential victim must be met. Accommodation must be provided for the potential victim in which they feel safe.  It can take on average 14 days for a reasonable grounds decision to be made and the Salvation Army (victim care contract holder) has no obligation to provide accommodation.  <b>Child.</b> At point of contact the child should be referred to child safeguarding services.

<sup>17</sup> Human Trafficking Foundation, Adult Modern Slavery Protocol for Local Authorities

	<p>Child protection processes should continue to take place regardless of subsequent decisions made through the NRM.</p>
<p><b>Support for victims with a negative reasonable grounds or conclusive grounds.</b></p>	<p><b>Adult.</b> Haringey will conduct a risk assessment of the potential victim's situation and ensure they have support and safe space to stay. The potential victims will still possibly possess some or all of the vulnerabilities they had prior to NRM referral.</p> <p>If we or the potential victim 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 potential victim will leave support provided under the Victim Care Contract within nine working days.</p> <p><b>Child.</b> We will revert to our normal child protection assessments to identify what support is needed for the child.</p>
<p><b>Support for victims post NRM</b></p>	<p><b>Adult.</b> 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><b>Child.</b> 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 and promote the welfare of looked after children in their area.</p>
<p><b>Ensure that clear multi-agency communication channels exist</b></p>	<p>A Multi Agency Case Conference (MACC) will identify the recourses and actions needed to meet the needs of victims of modern slavery in Haringey.</p>
<p><b>Learning and sharing information to understand and improve the NRM.</b></p>	<p>Haringey 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>



## 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.

**Action: Over the next two years, the council will work with its key partners to update its localised directory of support services.** This would replicate, at a local level, the advice and support services previously mapped out by the Human Trafficking Foundation.<sup>18</sup>

## 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.

### 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 Slavery.<sup>19</sup> 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.

## f. Community Engagement

To effectively tackle modern slavery in Haringey, collaboration with the 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.

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<sup>18</sup>Modern Slavery Support Services <https://www.humantraffickingfoundation.org/support-services>

<sup>19</sup> <https://party.coop/local/councillors/modern-slavery-charter/>

Collaboration with a range of partners, both locally and nationally has helped to highlight the main priority areas which community engagement prioritises. These are identifying victims, referring to the NRM, and providing wider support.

### **Referring to the NRM and other support services**

There is a need to provide VCS organisations and the wider community with the information they 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 VCS organisations, and flag the services provided by Haringey Council. Organisations expressed that Haringey Council must work to ensure victims feel supported and welcomed.

### **Key actions are as follows:**

- 1. Share referral pathway information with VCS partners.**
- 2. Create a clear network of services offered to victims throughout Haringey, allowing providers to direct victims to the services they require.**

## **g. The cost-of-living crisis.**

The cost-of-living crisis may lead to particular groups becoming more vulnerable to exploitation, especially where they are already in a precarious position financially. Empowering more staff in Haringey to recognise the signs of modern slavery and how to respond will continue to be crucial in ensuring that communities remain safer places for vulnerable individuals who may be at risk of this crime. This is especially important when more residents will be at risk of poverty and financial hardship and these factors are likely to exacerbate levels of exploitation and human trafficking.

**Action: Training more staff to identify the signs of modern slavery and how to respond using the correct reporting procedures.** This will help to support communities most at risk of modern slavery and in identifying and supporting potential victims.

## **h. 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 a local level<sup>20</sup>. Our approach to modern slavery governance and delivery will be achieved through a focused oversight group. The group will meet once a year and include representation from directorates across the council, the Police, Voluntary and Community Sector organisations and the NCL Integrated Care Board. Furthermore, the group will build links to the wider London Modern Slavery Leads Network to share knowledge and intelligence on the patterns and locations of modern slavery incidents in the borough.

**Action: Progress reports will be given as needed to the Haringey Community Safety Partnership and the Children’s and Adult’s Safeguarding Boards/Partnerships.**

## 4. Table of Actions

Area for Strategic Approach	Action
<b>Data and Intelligence</b>	<ul style="list-style-type: none"> <li>• Develop our understanding of how other local authorities in London are responding to cases of modern slavery and human trafficking based on the data and intelligence obtained.</li> <li>• Improve our dialogue with the Home Office to better utilise their published data and intelligence.</li> <li>• Community Safety to continue working with the Police National Modern Slavery Investigation Team who respond to all crime reports generated by the NRM.</li> </ul>
<b>Awareness and Training</b>	<ul style="list-style-type: none"> <li>• Training continues to be offered to front-line staff to support with the identification of the signs of modern slavery and in the follow up reporting processes through the NRM.</li> </ul>
<b>Support for Victims</b>	<ul style="list-style-type: none"> <li>• Over the next two years, the council will work with its key partners to update its localised directory of support services.</li> </ul>
<b>Community Engagement</b>	<ul style="list-style-type: none"> <li>• Share referral pathway information with VCS partners</li> <li>• Create a clear network of services offered to victims throughout Haringey, allowing providers to direct victims to the services they require.</li> </ul>
<b>The cost-of-living crisis</b>	<ul style="list-style-type: none"> <li>• Training more staff to identify the signs of modern slavery and how to respond using the correct reporting procedures.</li> </ul>
<b>Governance and Delivery</b>	<ul style="list-style-type: none"> <li>• Progress reports will be given as needed to the Haringey Community Safety Partnership and the Children’s and Adult’s Safeguarding Boards/Partnerships.</li> </ul>

<sup>20</sup> Tackling Modern Slavery: A Council Guide. The Local Government Association. December 2017. <https://www.local.gov.uk/modern-slavery-council-guide>

## 5. Appendices

### Appendix 1. Current Activity around Modern Slavery in Haringey

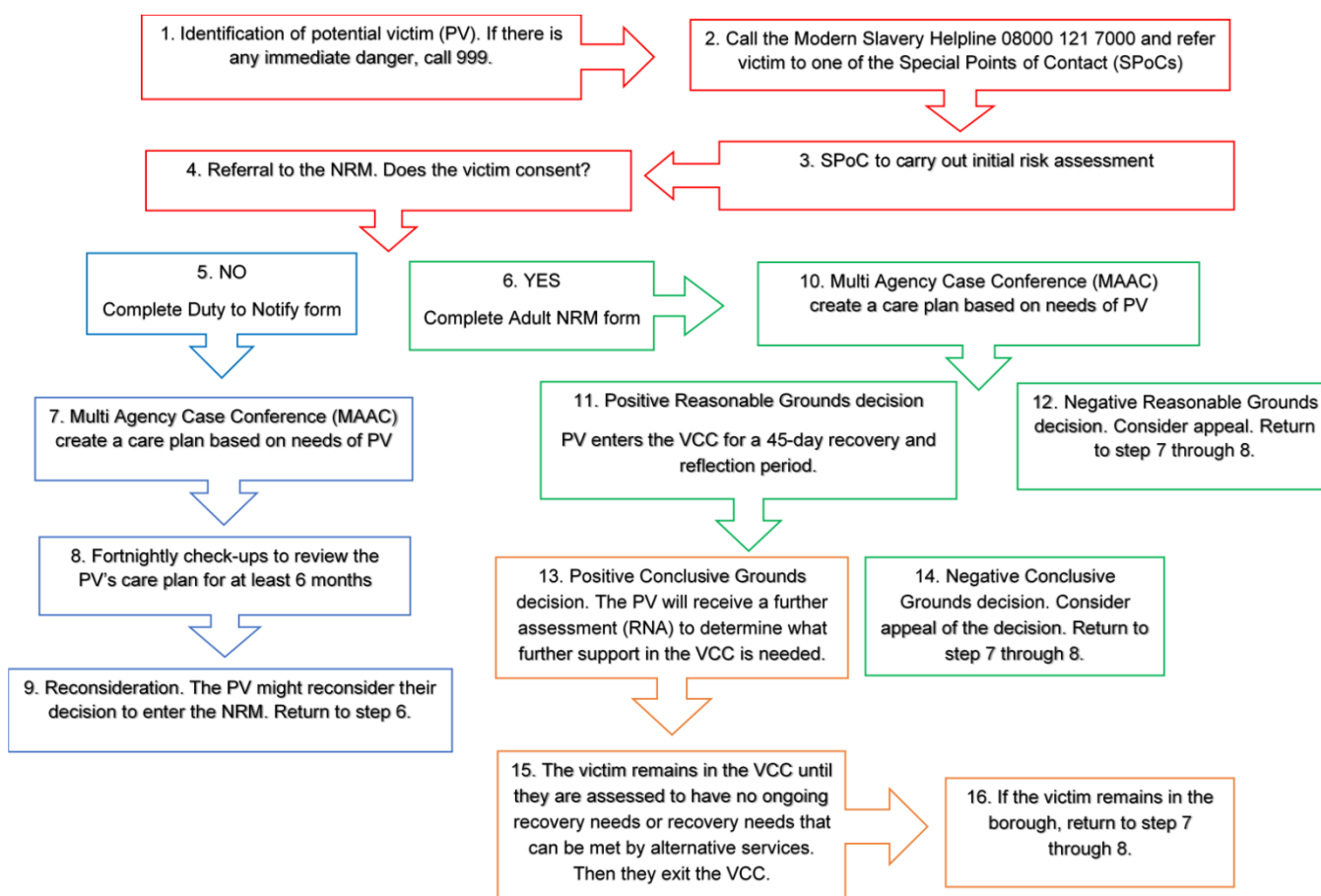
Activity	Further information
<b>Development of a JSNA on Modern Slavery</b>	A JSNA containing local data and intelligence on modern slavery was originally produced in 2020 and has since been refreshed. The JSNA contains information on national plans and strategies concerning modern slavery at a national level and how these influence the local context. The JSNA will be refreshed every two years.
<b>Training</b>	<p>Awareness raising training has been delivered by a Lead Social Worker to staff in 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"> <li>- Human trafficking and modern slavery definitions and criteria including case studies.</li> <li>- The Modern Slavery Act</li> <li>- Spotting signs of modern slavery (indicators and signs),</li> <li>- Identification and provision (including NRM),</li> <li>- Internal and multi-agency responses</li> </ul> <p>There is aspiration to scale up the Councils training offer, extending this to partners and community groups.</p>
<b>Member of the Co-Operative Charter Against Modern Slavery</b>	In 2019, the Council signed up to the Co-Operative Parties Charter Against Modern Slavery <sup>21</sup> . This commits councils to proactively undertake vetting of their own supply chain to ensure no instances of modern slavery are taking place and to report annually on the process.
<b>Member of the London Modern Slavery Leads Network</b>	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.

<sup>21</sup> 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	Employment
<ul style="list-style-type: none"> <li>• Crammed/rough sleeping conditions</li> <li>• Cars or minibuses picking up at unusual times</li> <li>• No private sleeping space</li> <li>• Lack of family photos or personal belongings</li> <li>• Post stacked up and discarded envelopes on the floor</li> <li>• Scripts by the telephone</li> <li>• Unable to show any autonomy over the accommodation, e.g., no bills or tenancy agreement</li> </ul>	<ul style="list-style-type: none"> <li>• Sign of physical or sexual abuse and/or has contracted STIs or has an unwanted pregnancy.</li> <li>• Not registered with a GP practice</li> <li>• Late presentation to maternity services</li> <li>• Malnourished</li> <li>• Mental ill health occurs frequently in survivors of modern slavery<sup>22</sup>; e.g., trauma, PTSD, panic attacks</li> <li>• Work related injuries often through poor health and safety</li> <li>• Drug/alcohol dependency</li> <li>• Broken bones that haven't healed properly</li> </ul>	<ul style="list-style-type: none"> <li>• Wearing unsuitable clothing e.g., flipflops in winter, no helmet of a construction site</li> <li>• Poor health and safety equipment, unhygienic and unsafe working conditions</li> <li>• (Perception of) debt bondage</li> <li>• Employers unable to produce the correct documents for migrant workers</li> </ul>

## Appendix 3. Haringey referral pathway



## Appendix 4. Benefits and challenges presented by the NRM

Benefits	Considerations
<ul style="list-style-type: none"> <li>Formally recognises a person as a victim of modern slavery (on receiving a positive conclusive ground decision).               <ul style="list-style-type: none"> <li>➤ This can support a Section 45 defence<sup>23</sup>, which is becoming increasingly relevant for young people involved in county lines.</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>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.</li> </ul> <p>However, there is a legal duty to refer all potential child victims into the NRM.</p>
<ul style="list-style-type: none"> <li>Helps to improve the UK data and intelligence picture about modern slavery, with this helping to develop and define the support offer for victims.</li> </ul>	<ul style="list-style-type: none"> <li>Once a referral has made into the NRM, there is up to a 5-day waiting period for a reasonable ground's decision. During this time, there are no clear assurances to the potential victim about accommodation and support.</li> </ul> <p>Work is needed to define Haringey's support offer during this 5-day time period.</p>
<ul style="list-style-type: none"> <li>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"> <li>-Safehouse accommodation</li> <li>-Outreach worker support</li> <li>-Legal advice</li> <li>-Healthcare</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>Those referred into the NRM, who are not UK nationals are unable to work during time in support services.</li> </ul>
<ul style="list-style-type: none"> <li>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.</li> </ul>	<ul style="list-style-type: none"> <li>Some victims may not feel comfortable sharing information 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.</li> </ul>
<ul style="list-style-type: none"> <li>Initiates a Police investigation. Every submitted NRM generated a crime report which goes to the MET's central intelligence team.</li> </ul>	<ul style="list-style-type: none"> <li>Lack of clarity over what happens when a person leaves the NRM.</li> </ul>
	<ul style="list-style-type: none"> <li>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.</li> </ul>

<sup>23</sup> The Modern Slavery Act, 2015- Section 45. <http://www.legislation.gov.uk/ukpga/2015/30/section/45/enacted>