

## MUNICIPAL YEAR 2019/2020 REPORT NO. 205

### MEETING TITLE AND DATE:

30<sup>th</sup> January 2020

### REPORT OF:

Director of Health and  
Adult Social Care

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Agenda – Part:1

Item: 4

**Subject: Modern Slavery Strategy**

**Wards:**

**Key Decision No:**

**Cabinet Member consulted: Cllr Alev  
Cazimoglu**

### 1. EXECUTIVE SUMMARY

The Modern Slavery Act 2015 was introduced to combat modern slavery and associated vulnerabilities within the UK and sought to consolidate previous offences pertaining to trafficking and slavery.

To ensure that LBE is adhering to its duties under the MS Act 2015, we have been actively working on the following:

- Online and face to face training for LBE staff
- External training provided to social care providers
- Appointment of Modern slavery lead within adult social care and champions within the teams- with additional training to support them in this role
- Signing of the Charter against Modern Slavery- 17th October 2018
- The formation of a Modern Slavery Strategy Board Chaired by Bindi Nagra and comprising of adults, children, Community Safety, police, safer neighbourhoods, housing and health.
- Modern Slavery Conference 16th May 2019 and 13<sup>th</sup> May 2020
- Formation of a Modern Slavery Team commencing on 20<sup>th</sup> January 2020

The Modern Slavery Strategy 2019-2022 online public consultation ended on 8<sup>th</sup> November 2019 and collected 41 individual responses and lots of positive feedback from council departments, user groups and partnership forums. The responses were overwhelmingly positive and generated some twitter responses from members of the public and Non-Government Organisations.

### 2. RECOMMENDATIONS

Cabinet is asked to note the comments of this report and approve the publication of the strategy, dissemination and communication of key messages.

### **3. BACKGROUND**

The Modern Slavery Act 2015 places new duties on to local authorities as first responders to provide the necessary support and protection to potential victims of modern slavery. This role will continue to be met by the respective Multi Agency Safeguarding Hubs in Adult and Children services.

This Act also sets out measures for a more effective response to issues relating to the alleged perpetrators; including stronger law enforcement, harsher punishments for perpetrators, measures to protect and support victims and with the overall aim to reduce incidents of modern slavery and human trafficking. To achieve this, Enfield Council will be working jointly with Enfield & Haringey BCU (Met Police) to develop a team to ensure compliance with the Act and to disrupt the criminal activity and prosecute the gang members responsible.

This plan has been set for a 3-year period due to the Act being in its infancy and the current consultations that are underway by central government. This will enable Enfield Council to make changes in line with central government when necessary.

The strategy aims to be free from jargon and in plain English. This is in line with Care Act and Modern Slavery Act requirements. The document has been constructed in a way which will enable it to support the consultation and also help to raise awareness about Safeguarding Potential Victims of Modern Slavery.

Enfield will be encompassing the governments 4P's to aid our approach: Prevent, Protect, Pursue, Prepare.

- Prevent - Raising Awareness, Intelligence gathering and reporting, Disruption and intervention
- Pursue – Investigate and prosecute
- Protect - Short, medium and long-term protection and support for the vulnerable
- Prepare – Have arrangements in place to facilitate above and undertake major operations

#### **Key Considerations:**

The Strategic Safeguarding Team have completed training for over 300 council employees and continues to support local business to understand the importance of thorough worker checks and employee rights. The Strategic Safeguarding Team has also developed online training modules for staff to keep their knowledge base up to date. This training has now been made compulsory for all new staff members across the whole council.

A modern slavery lead has been appointed and has been in post since August 2018 and sits in the Strategic Safeguarding Team. Due to the complexities surrounding modern slavery, there continues to be a need for all departments to remain involved from social services to housing to community safety. To ensure cross departmental working a Modern Slavery Board was established on 5<sup>th</sup> November 2018 and continues to be chaired by the Director for health and Adult Social Care. The Board meets every six weeks to lead in completing audit tool kits, discussing training development for front line staff with possible opportunities for shared training days. The Board also takes forward specific pieces of work, which are of interest to the group, and will improve the safety and response to reports of harm to adults at risk.

The first ever Modern Slavery Conference was held at the Dugdale Centre on 16<sup>th</sup> May 2019. This event was supported by the Director for Health and Social Care and Cllr Cazimoglu who both took the time to speak at the event. Due to the success of the event another one has been scheduled for 13<sup>th</sup> May 2020 and will be extended to local businesses along side practitioners.

Enfield is the first borough and council nationally to implement a Modern Slavery Team with the local police unit. The team will run alongside existing safeguarding teams. The team will consist of a team manager and two council investigators. They will be supported by two civilian police officers and a Detective Inspector. The objective of the Modern Slavery Team is to look at contextual modern slavery issues by establishing patterns and trends and to jointly investigate gangmasters and criminal behaviours at a higher level. Concerns for potential victims will continue to be referred to the respective Multi Agency Safeguarding Hubs (MASH) for enquiries to be completed. Or if the level of risk is very high the case will be referred to the police immediately. Due to these initiatives that have been implemented by Enfield Council, Sharon Burgess and Fiana Centala were nominated for an Anti-Slavery Day Award by the Human Trafficking Foundation. The Modern Slavery Team idea has been shared with other local authorities and Enfield's model has been picked up by Haringey and Waltham Forest.

Enfield has been trying to improve practice and coordinate a joined-up approach with counterparts in London. This saw the establishment of the London Modern Slavery Leads group which is chaired by Sharon Burgess who is the Head of Safeguarding and Principal Social Worker at Enfield Council. This group is supported by the London Councils and the Human Trafficking Foundation.

#### **4. ALTERNATIVE OPTIONS CONSIDERED**

The Modern Slavery Act 2015 places new duties on to local authorities as first responders to provide the necessary support and protection to potential victims of modern slavery. This role will continue to be met by the respective Multi Agency Safeguarding Hubs in Adult and Children services.

## **5. REASONS FOR RECOMMENDATIONS**

With the commencement of the 3-month consultation, there is an opportunity to raise awareness about modern slavery and for Enfield residents to contribute to the priorities that the Modern Slavery Team will be focussing on.

## **6. COMMENTS FROM OTHER DEPARTMENTS**

### **6.1 Financial Implications**

There will be two PO1 posts created which will cost £100k (on current pay scales), with on costs and £20k training costs, totalling £120k as a result of this scheme.

In the Medium Term Financial Plan, there is an investment of £120k to fund the scheme. This will be included as part of the Budget Report and Medium Term Financial Plan to full Council in February 2020.

### **6.2 Legal Implications**

The Modern Slavery Act 2015(MSA) is aimed at combating crimes of slavery and human trafficking. The MSA recognises that businesses have a role to play in tackling these crimes. Section 54 of the MSA requires commercial organisations having a turnover of £36 million or more to publish an annual slavery and human trafficking statement. The statement must disclose what steps the organisation has taken to ensure that human trafficking is not taking place in any of its supply chains or its businesses. The procurement of goods and services will be part of a business' supply chain. As such, a customer should consider whether to include wording in their supply agreements that prohibits the use of forced or trafficked labour.

Although section 54 of the MSA only applies to organisations that meet the turnover threshold, smaller organisations can choose to make a statement voluntarily. The updated Home Office guidance, Transparency in Supply Chains etc. A practical guide), encourages all businesses, regardless of turnover, to be open and transparent about their recruitment practices, policies and procedures regarding modern slavery and human trafficking, and to take steps that are consistent and proportionate with the organisation's sector, size and operational reach (paragraph 3.14, Transparency in Supply Chains etc. A practical guide).

Organisations making a voluntary statement may wish to include the items suggested in section 54 of the MSA, which includes information on: Structure: The way the organisation is structured, its business and

supply chains; Policies: Its policies (if any) relating to modern slavery and human trafficking; Due diligence :its due diligence processes relating to slavery and human trafficking; Risk: The parts of its business and supply chains at risk of slavery and human trafficking and the steps taken to manage that risk; Effectiveness: Its effectiveness in ensuring that slavery and human trafficking is not taking place in its business or supply chains, measured against appropriate performance indicators; Training: Details of training provided for its staff on slavery and human trafficking.

A number of international instruments require the UK government and its agencies, to combat human trafficking. The Modern Slavery Act 2015 creates defences for victims of human trafficking. Defences may fall under: The European Convention for Human Rights, 1953 (Article 4 prohibits slavery and forced labour), the government's Updated National Action Plan on Modern Slavery and The United Nations Guiding Principles. Other relevant legislation is the EU Trafficking Directive 2011, the Council of Europe Convention on action against trafficking in human beings, the Housing act 1996, **the Care Act 2014 and the Homelessness Reduction Act 2017.**

## **7. KEY RISKS**

Risks have been considered and are included within other sections of this report. The aim of the strategy is to mitigate risks. Once the team is formed, they will actively manage their risks on an ongoing basis. Foreseeable risks include:

- Check for anti-slavery clauses in contracts with suppliers and making amendments where necessary.
- Incorporating anti-slavery compliance into other Council policies and standard procurement terms.
- Supply chains including service users who manage their own personal budgets and care homes/domiciliary companies

Awareness-

- Public awareness
- Housing and social care support if the potential victim declines NRM support

## **8. IMPACT ON COUNCIL PRIORITIES – CREATING A LIFETIME OF OPPORTUNITIES IN ENFIELD**

### **8.1 Good homes in well-connected neighbourhoods**

Joined up and targeted approaches to carrying out checks on Houses of Multi-Occupancy (HMOs) across the county to look for signs that occupants could be subject to modern slavery or human trafficking will help raise living conditions and lead to more prosecutions under the Modern Slavery legislation and rogue landlords.

## **8.2 Sustain strong and healthy communities**

This proposal will help deliver on protecting those most in need by continuing to deliver the services and safeguarding measures they rely on by working with the Police and other partners to make Enfield a safer place to live, work and study whilst ensuring a robust response to crime

## **8.3 Build our local economy to create a thriving place**

Enfield is London's second largest industrial location and as such is potentially exposed to more possible cases of modern slavery. By completing thorough checks, we can improve the experiences of those working and living in Enfield.

## **9. EQUALITIES IMPACT IMPLICATIONS**

The options available have been considered for their potential impact on equalities. The aim of the team would be to run and review performance data on a quarterly basis demographics of those whom are referred to a service. It is expected that the running of a Service to statutory requirements will provide the necessary checks to ensure those whom due to age and/or disability (including mental health) are provided with the appropriate and least restrictive care and treatment where necessary and appropriate.

## **10. PERFORMANCE AND DATA IMPLICATIONS**

This report has set out the increasing pressure on the local authority as a result of modern slavery not naturally sitting within a specific service; resulting in reduced NRM referrals and mixed messages to professionals.

## **11. PUBLIC HEALTH IMPLICATIONS**

Safeguarding of adults at risk is recognised as a significant public health issue; preventing abuse and promoting of choice will increase wellbeing within these populations.

The priorities in the draft we will work with local people and partners to promote an approach that concentrates on improving the quality of life for the adults concerned; being safe is only one of the things people want for themselves and there is a wider emphasis on wellbeing. The strategy emphasizes prevention of abuse and work within services that provide care to evidence engagement with those who use services.

## **Background Papers**

*Modern Slavery Strategy 2019-2022*