

Enfield Modern Slavery Strategy

2023-2028

*Fighting to End
Modern Slavery
in Our Borough*



Scope	Enfield's Modern Slavery Strategy sets out how we will work together with our partners to tackle modern slavery in our borough. This includes working in partnership to identify victims and to deliver the care and support they need. This strategy focuses on the work of the Modern Slavery Team in relation to Adults over the age of 18.
Approved by	To be approved by the Cabinet
Approval date	9.12.2022
Document Author	Strategic Safeguarding Adults Services
Portfolio holder	Cllr Alev Cazimoglu, Cabinet Member for Health and Social Care
Governance	Modern Slavery Board
Review	The Modern Slavery Board will review this strategy on an annual basis, and where necessary, update the document to respond to local and national changes.

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Message from Councillor Alev Cazimoglu

I am proud to present our Modern Slavery Strategy on behalf of Enfield Council which shows concerted and coordinated action.

Enfield's Modern Slavery Strategy 2023-28 builds upon our previous successes and demonstrates Enfield's continued commitment to tackling modern slavery. Enfield has made great progress in meeting the objectives demonstrated in the previous Modern Slavery Strategy 2020-23 with tangible results and successful prosecutions to those committing modern slavery offences.

Here in Enfield we continue to provide a multidisciplinary response in the fight against modern slavery. We recognise that trafficking, slavery and exploitation are not issues from the past. We all share a responsibility to fight and end modern slavery. Jointly we can all build a future where modern slavery and exploitation are truly a thing of the past.

Councillor Alev Cazimoglu
Cabinet Member for Health & Social Care



Need support?

In an emergency, always call 999. If you come across anything suspicious or need support, contact the Enfield Modern Slavery Team, **020 3821 1763**, ModernSlavery@enfield.gov.uk

For local services, visit [MyLife Modern Slavery](#)

Introduction

Modern slavery is a serious crime that strips its victims of their basic human rights and dignity. Modern slavery is a term, which includes human trafficking, slavery, servitude and forced or compulsory labour; and can occur irrespective of age, gender, nationality or economic circumstances. Internationally, modern slavery continues to be the fastest growing crime, and the second largest source of illegal income for organised criminality.

Enfield Council and our partners are working together through a multi-agency approach to tackle modern slavery in the borough. Our approach includes three aims:

- To effectively tackle organised crime networks locally
- To deliver the right information, advice, support, and care to victims
- To raise awareness around identifying modern slavery and the referral process, including the [National Referral Mechanism \(NRMs\)](#).¹

Locally we have a dedicated Enfield Modern Slavery team, which focus on investigating locational issues such as homes or businesses. Our team includes 2 investigators that work jointly with Enfield and Haringey Police Basic Command Unit (BCU) to tackle the criminal element of modern slavery. The Modern Slavery Team also provides support to the Multi-Agency Safeguarding Hub (MASH) teams, where they have exploitation concerns about children and adults.

The Modern Slavery team report to the Enfield Modern Slavery Board. The Board is chaired by the Council's Director of Health and Adult Social Care and was established in November 2018. The Board meets quarterly and is responsible for providing strategic direction and leadership to deliver our strategy and monitoring of the Modern Slavery Team's Action Plan. The Board also makes sure our local partnership, council departments (such as Housing and Community Safety), and information, advice support and care pathways work effectively.

The Modern Slavery Strategy has been developed in partnership with stakeholders including survivors and residents. Our new strategy builds upon the previous Modern Slavery Strategy 2020-2023 and the successes of the Modern Slavery Team. This includes signing a Charter Against Modern Slavery, which aims to establish ethical labour sourcing practices in our supply chains. The Modern Slavery Team continues to work hard to increase the number of referrals into the National Referral Mechanism (NRM), and we have supported 56 potential victims to enter the NRM. Of the 56 referrals made, 53 referrals resulted in individuals receiving care and support from the Salvation Army.

¹ The NRM is a framework for identifying and referring potential victims of modern slavery and ensuring they receive the appropriate support.

What is modern slavery?

Modern slavery is complex; but simply put, it describes a situation where someone is made to do something, and another person gains from this. Modern slavery is about being exploited and completely controlled by someone else, without being able to leave. It includes human trafficking, slavery, servitude and forced or compulsory labour.

Modern slavery is the deception or coercion of a person for the purpose of exploitation.

Deception or coercion for the purpose of exploitation

Deception or coercion may include threats, force, debt bondage and abuse of power or vulnerability. For anyone under the age of 18, the abuse of vulnerability is automatically present.

The purpose of exploitation may include the following:



Forced labour

Being made to work for little or no money



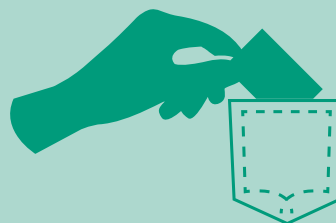
Sexual exploitation

Being coerced or forced into selling sex



Domestic servitude

Being made to work within a home environment for little or no pay



Criminal exploitation

Being forced to break the law for someone else (i.e. stealing, selling drugs)



Forced/sham marriage

Being made to marry someone you don't want to marry



Organ harvesting

Bodily organs being removed for financial gain

Myths about modern slavery

MYTH:

People must be locked in or tied up to be victims of modern slavery

TRUTH:

People aren't usually chained or restrained. They might be allowed to use a phone or roam freely outside. We refer to this as being "hidden in plain sight." A victim of modern slavery could be repairing the roof of your home or preparing your food in a restaurant. People are kept in modern slavery by threats to themselves or their families, lies, brutality, coercion, and the perception that they have debt to pay off, not by actual chains.

MYTH:

All victims of modern slavery are women and all exploiters are men

TRUTH:

People of all genders can be victims of all forms of modern slavery. This includes men being victims of sexual exploitation and women being victims of forced labour. Similarly, people of all genders can exploit others.

MYTH:

It's only modern slavery if the person doesn't get paid

TRUTH:

Modern slavery can include people on no pay but also extremely low pay. Often the money that people are paid will go towards their transportation and recruitment costs, which is known as debt bondage. People should not be made to work in conditions that deny their basic human rights (such as working extremely long hours, being made to sleep where they work and denied food etc.).

MYTH:

Victims of modern slavery are from countries outside the UK

TRUTH:

Modern slavery affects every nationality. The most common nationalities referred in 2021 to the NRM were from the UK, Albania and Vietnam.

MYTH:

If I asked someone if they were a victim of modern slavery, they would tell me

TRUTH:

There are many obstacles that could prevent someone from asking for assistance, or they could respond that they're alright when questioned. The inability to communicate in a language, not knowing that help is available, not realising that they are victims, fear for their lives or the lives of their family members, fear of being expelled from the country, manipulation of someone's faith or belief, such as using witchcraft, misplaced loyalty to the exploiter, and fear of institutions like the police are a few of these obstacles. Additionally, people may find it difficult to agree on working arrangements because to vulnerability factors including learning disabilities, mental illness, addiction, or their age.

Our approach

The Enfield Modern Slavery Team works with partners to utilise a multi-agency approach to tackle the crime of modern slavery within the borough.

Our multi-agency approach includes three aims:

1. To effectively tackle organised crime networks locally.
2. To deliver the right information, advice, support, and care to victims.
3. To raise awareness around identifying modern slavery and the referral process, including the National Referral Mechanism.

Our team works with internal departments across the Council and external organisations to try to achieve these aims. We are core members of several meetings where we link into other teams and often share information on cases where there is a modern slavery/human trafficking concern. The meetings the team attends are:

- **Partnership Problem Solving Group (PPSG)** – This is where anti-social behaviour concerns are raised including potential brothel and cuckooing locations of concern.
- **Community Multi Agency Risk Assessment Conference (CMARAC)** – Information is shared to manage and resolve complex high-risk cases of anti-social behaviour.

- **Multi Agency Risk Assessment Meeting (MARAM) and Rough Sleepers Board** – These meetings are to discuss and share information around individual homeless/rough sleepers with complex needs in order to better understand the individual, their needs and propose appropriate action.
- **Multi Agency Child Exploitation meeting (MACE)** – The main purpose of the MACE meeting is to facilitate the sharing of information about children at risk of exploitation as well as potential perpetrators and locations that could pose a risk of harm to individuals or groups and to develop a detailed strategic and tactical overview of the exploitation profile.
- **Vulnerable Young People (VYP)** – To maintain a strategic overview of the work of various groups including Enfield’s response to CSE/CCE, trafficking and modern slavery and constructively challenge quality of services and timely delivery of objectives.
- **Operational meeting with Police** – Bi-weekly meetings are held with the Modern Slavery Team and Police colleagues to discuss ongoing cases and share information and updates.

An action from the previous strategy was for the creation of a Modern Slavery Board which has been formalised with our multi agency partners and meets quarterly to oversee the work of the Modern Slavery Team.

A Modern Slavery Forum takes place every quarter where professionals attend to discuss any cases or seek advice from the team. The purpose of the forum is to strengthen multi-agency working and to promote clear pathways to streamline information sharing between services.

The Head of Safeguarding Adults and Quality Assurance, Sharon Burgess alongside the Human Trafficking Foundation established the London Modern Slavery Leads Network (LMSL). This consists of representatives from each of the thirty-two London boroughs and other select partners across the capital. It provides an opportunity for all members to come together, share best practice, and highlight trends or challenges they have identified in their borough. These are then addressed collectively. Sharon has completed her three-year period as the chair of this meeting.

The Modern Slavery Team focuses on delivering the strategy aims to potential victims aged 18+ however, there are similar action plans and work underway within Children Services to cover this area. Please refer to the below documents:

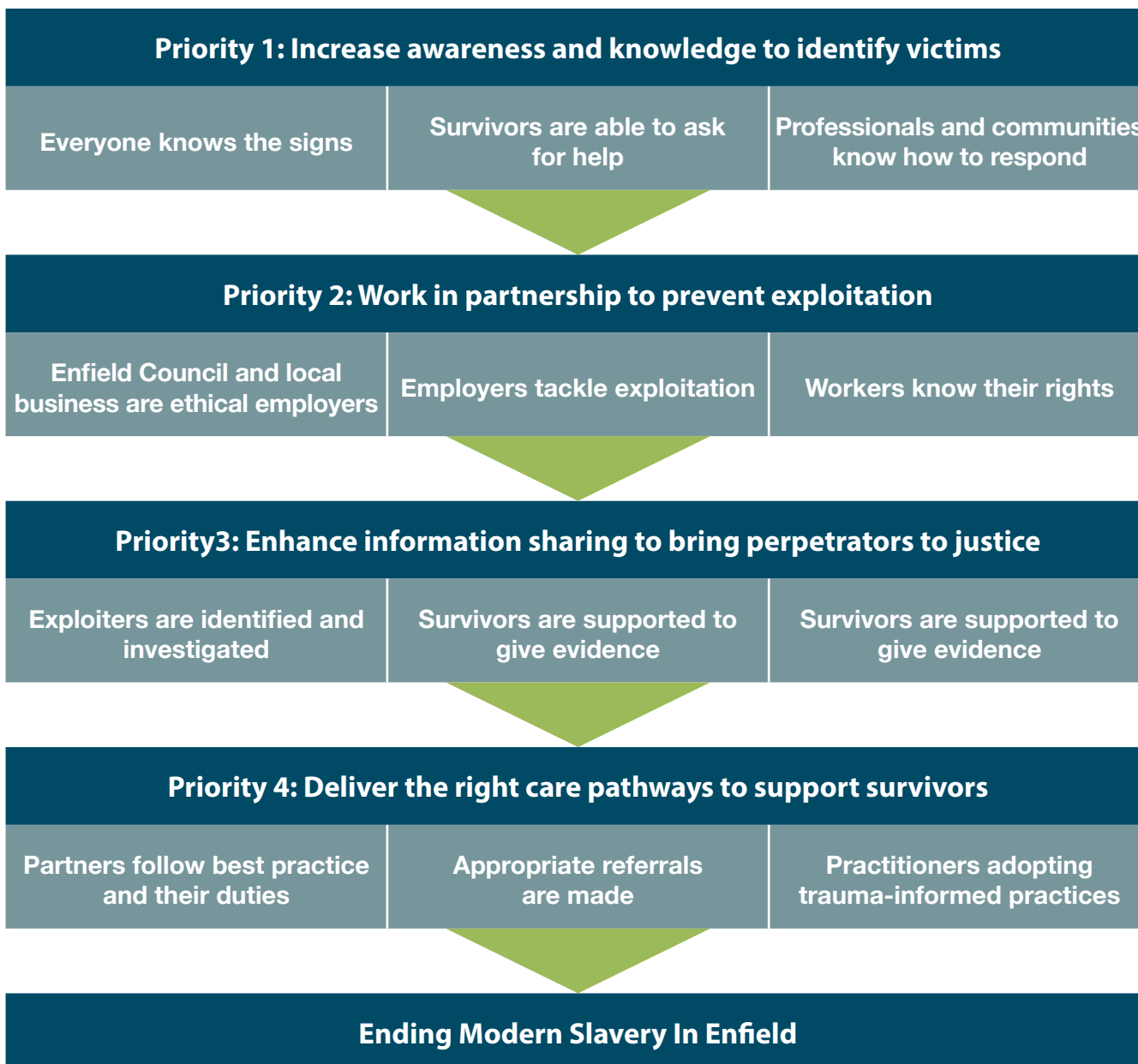
- [Safeguarding Adolescents from Exploitation Strategy](#)
- [Violence Against Women and Girl's Strategy](#)
- [Tackling Gangs, Serious Youth Violence and Exploitation Plan](#)

Our Vision and Priorities

Our vision is to eradicate modern slavery in the borough of Enfield.

Our priorities set out the 4 key areas that we will be focusing on over the next 5 years, as we work together with our partners to reduce modern slavery, and to protect and support survivors. This will enable all residents and visitors to live and work safely, and ensure our actions as businesses and consumers don't negatively impact individuals and communities elsewhere.

The chart outlines the four priorities that we need to deliver to help us to work towards our vision. Further details can be found within our Action Plan in Appendix 3.



The Picture in Enfield

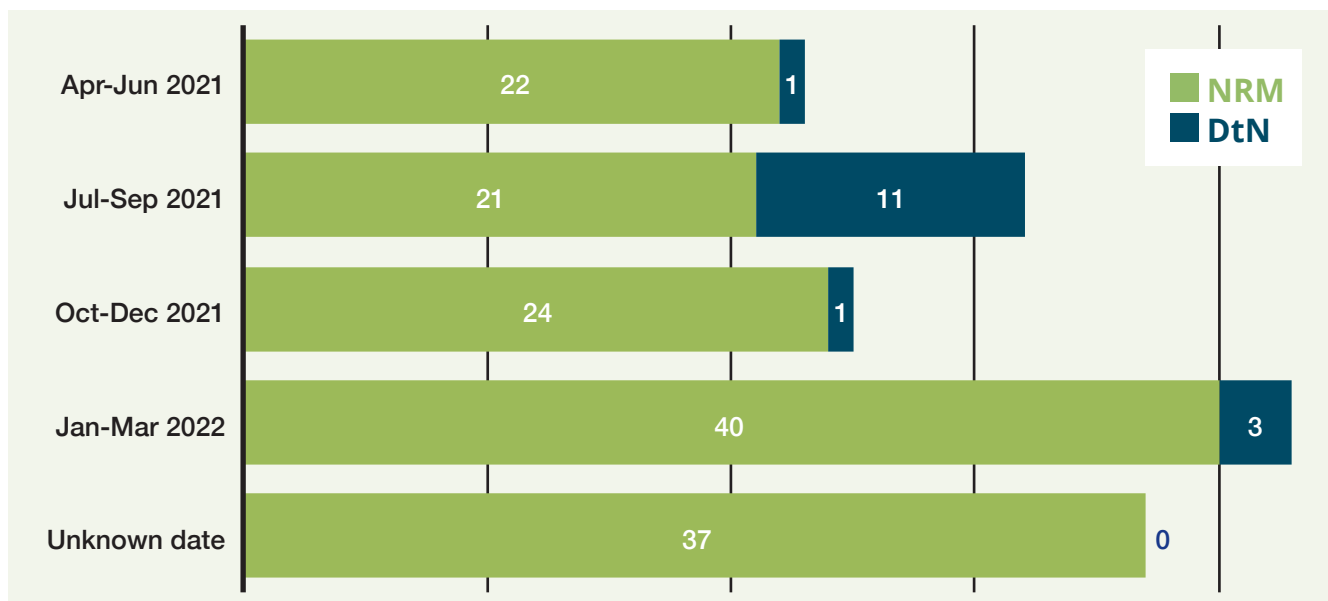
National Referral Mechanism (NRM) and Duty to Notify (DtN) Referrals

The National Referral Mechanism (NRM) is a framework for identifying and referring potential victims of modern slavery and ensuring they receive appropriate support. Organisations deemed to be First Responders such as; Local Authorities and Police are duty bound under Section 52 of the Modern Slavery Act 2015 to complete these referrals to the Single Competent Authority (SCA). The main difference between an NRM and DTN referral is consent required from the adult involved.

There was a total of 68 NRM (56) and DTN (12) referrals to the Single Competent Authority made by Enfield Council.

Of the 68 total NRM and DTN referrals that were made by LBE staff, in 64 of these cases the victim was exploited in the UK only. The remaining 4 were either exploited solely overseas or a combination of overseas and in the UK.

MONTHLY BREAKDOWN OF NRM/DtN REFERRALS

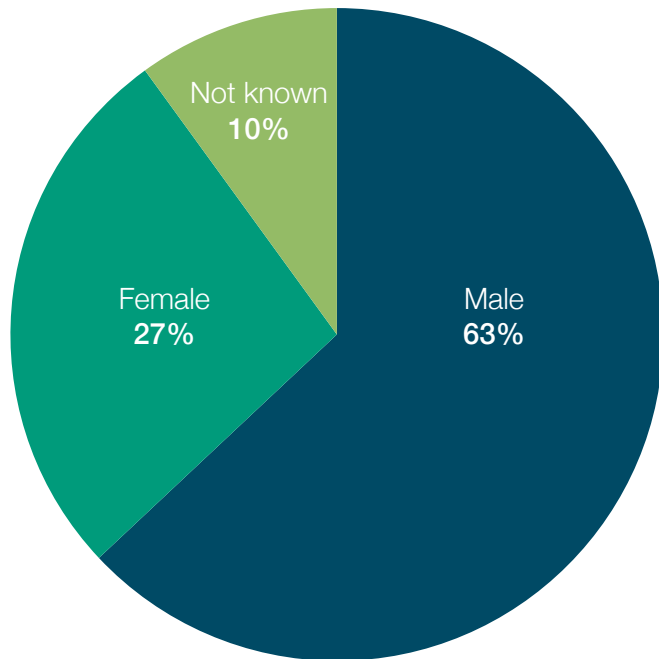


NB: These are NRM/DtN referrals made by all professionals (not just LBE staff) combined for Enfield residents.

Demographics

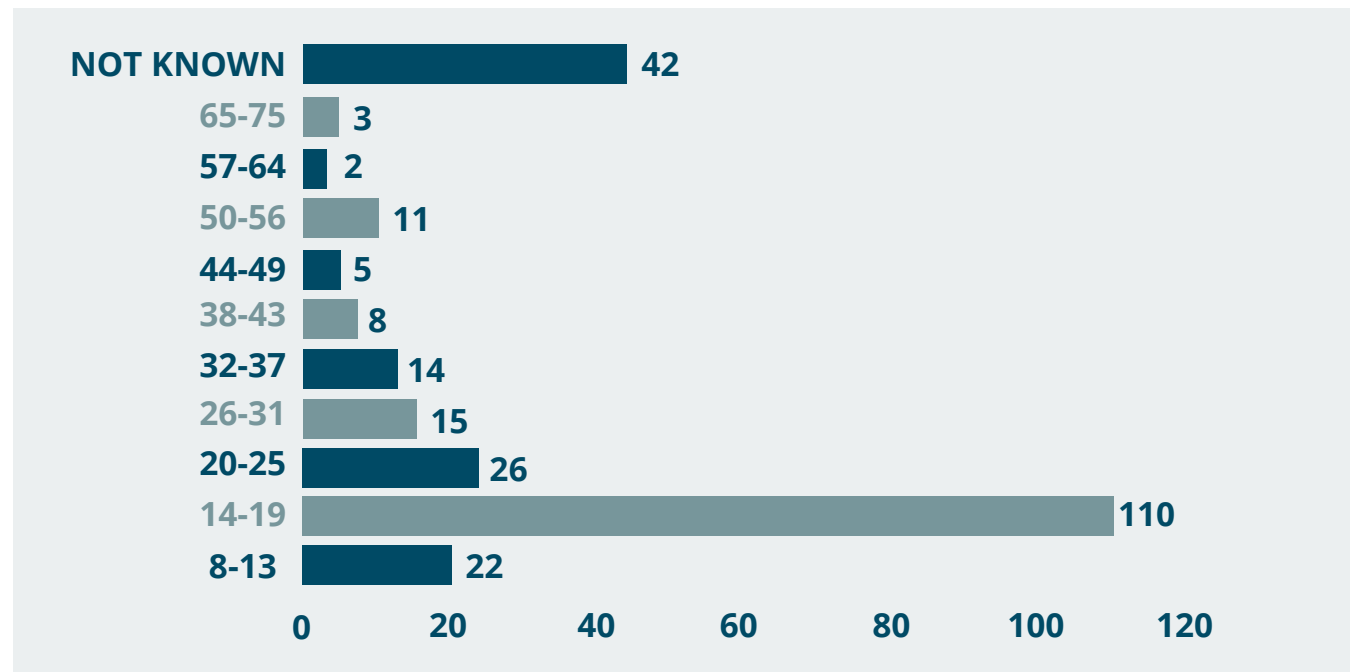
Gender

Males are overrepresented in the proportion of local referrals to the NRM. In 2021/22, there were 258 referrals, of these 63% of referrals were male, 27% were female and for 10% of referrals the gender of the individual was not known. Similarly, national figures from the Home Office, show that males are overrepresented. In 2021, males represented 77% of referrals nationally.



Age Range

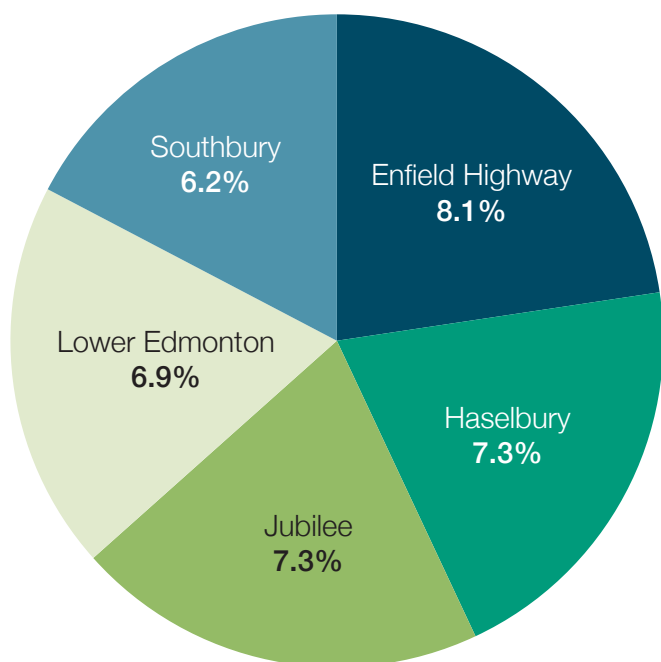
In 2021/22 the team received 110 referrals for individuals aged between 14-19. The youngest age for a potential victim was aged 8. The oldest potential victim was aged 75. There were 42 (16%) individuals where a concern was raised, where their age was not known.



Ward breakdown

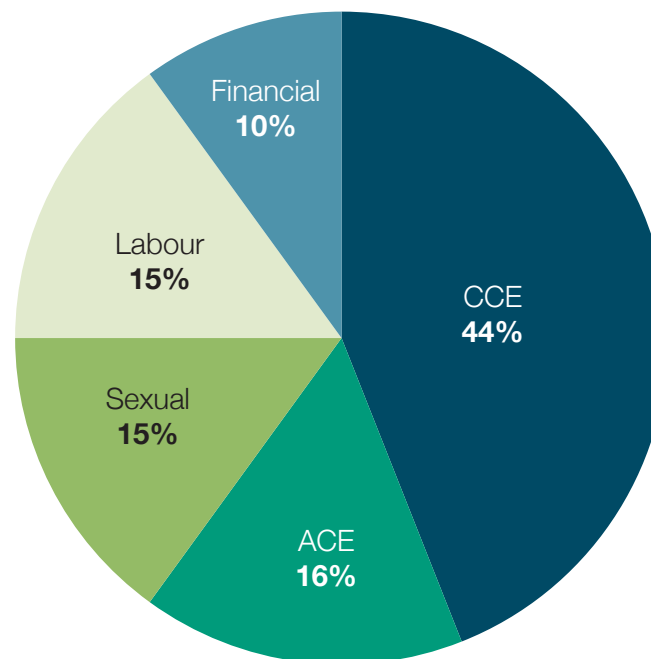
The highest proportion of referrals in the borough were in Enfield Highway, Haselbury, Jubilee, Lower Edmonton and Southbury wards. The postcode of the individual was 'not known' in 28% of referrals.

HIGHEST REFERRALS BY WARD



Forms of Exploitation

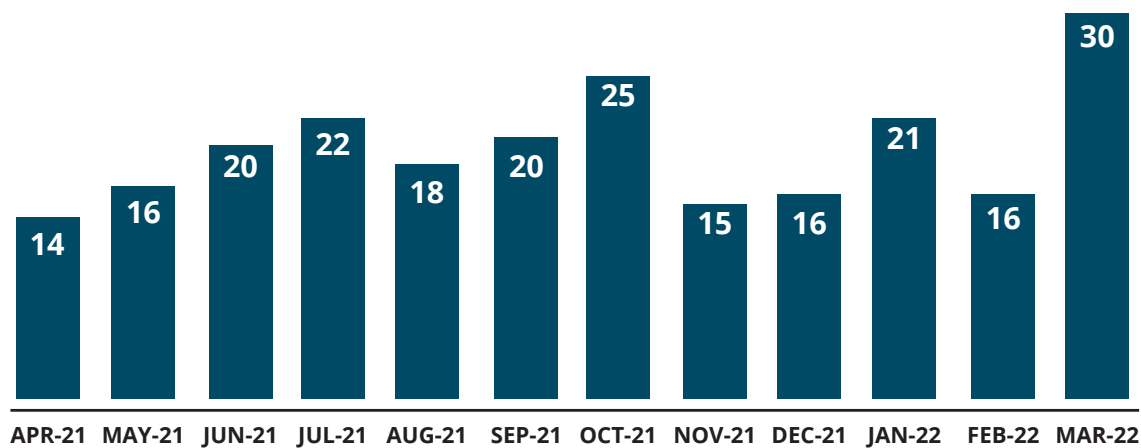
Criminal exploitation is the most common type of concern received by the Modern Slavery Team, this includes child criminal exploitation (CCE) which accounts for 44% of concerns, and adult criminal exploitation (ACE) which accounts for 16% of concerns. This is followed by sexual exploitation (15%) and labour exploitation (15%) and financial exploitation (10%).



Helpline

The team continue to promote the contact details of their helpline on various platforms such as on leaflets, posters, internal communications, on the Safeguarding Enfield website in order to raise awareness of how the team can be contacted to discuss any concerns around modern slavery and to refer into the team.

NUMBER OF CALLS TO HELPLINE



Governance and Delivery

Who will oversee the strategy?

Enfield's Modern Slavery Board is responsible for overseeing the delivery, monitoring and review of this strategy. The Modern Slavery Team will report on progress to deliver the Action Plan on a quarterly basis.

The strategy will be reviewed annually, and where necessary updated to respond to local and national changes.

Enfield Council retains responsibility as the lead co-ordinating organisation. All other relevant organisations and partners, including NHS bodies; the Departments of Social Security, Employment and Training; the Police and Probation Services undertake their legal duties in relation to safeguarding of adults and minors.

Police forces, in particular, have a key role in identifying and combating modern slavery. This strategy will be accompanied by an annual action plan that will detail the specific actions that need to be taken across the partnership to achieve our planned results.

How does this strategy link with other strategies?

This exploitation strategy must be considered and implemented alongside other strategies and procedures:

- [Enfield Council's Modern Slavery Policy and Procedure](#)
- [Preventing Homelessness and Rough Sleeping Strategy 2020-2025](#)
- [Enfield's Children and Young People's Plan \(Empowering Young Enfield\) 2021-2025](#)
- The Safeguarding Enfield Strategy 2023-28 (to be published)
- [Safeguarding Adolescents from Exploitation Strategy](#)
- [Violence Against Women and Girl's Strategy](#)
- [Tackling Gangs, Serious Youth Violence and Exploitation Plan](#)

Measuring Success – Our Impact

How will we measure our effectiveness?

We will measure our success and keep track of progress using our Action Plan. This important document helps us to recognise and understand the impact of our strategy, and where necessary it sets out any areas that might need to be improved. An overview of our Action Plan can be found on page 17 of this strategy.

We will evaluate the impact of our action plan through developing performance and quality measures.

It is important that we do not measure success only in data and numbers. At the heart of our work is the individual's lived experience, and making sure that we have a positive impact on their life and their long-term outcomes.

Survivors Story

Eva* was 36 years old when she was lured to the UK with the promise of a job and a safe place to stay. However, soon after arriving Eva's passport and mobile phone were removed and soon she was coerced into a life of forced labour and domestic servitude for a family she thought would support her dreams of building a life in the UK.

Eva was forced to work in the house, cleaning, washing, ironing and looking after her trafficker's children. In the evenings she was forced to work clean the cars that the family would try to sell along the street. Her traffickers would beat her when she didn't meet their targets.

Eva was made to sleep on the floor and was not paid for any of the work that she had undertaken. Her exploiters said any money she earned was being used to pay for her food and rent.

They controlled everything she did. Her exploiters would threaten her and tell her the police wouldn't help.

It took repeated attempts for the Modern Slavery Team to gain Eva's trust for her to make a disclosure that she was in fact being exploited and ill-treated by the family she was living with. This disclosure led to four people being charged and found guilty of various offences relating to modern slavery in March 2022.

"When I was in the middle of being exploited it seemed like it couldn't be worse than being homeless and without food or shelter," Eva said. "I am slowly rebuilding my life and I am grateful for all the help I have received."

**Name has been anonymised*

Appendix 1: Information and advice

Legislative Framework

The Government's approach to tackling modern slavery has been heavily shaped by a number of international laws, conventions and protocols which the UK has opted into, ratified or is already bound by, including the:

- 1950 European Convention on Human Rights (ECHR)
- United Nations Protocol to Prevent, Suppress and Punish Trafficking in Persons, especially Women and Children (Palermo Protocol 2000)
- Council of Europe Convention on Action against Trafficking in Human Beings 2005 (ECAT)
- EU Directive on Preventing and Combatting Trafficking in Human Beings and Protecting its Victims Directive 2011 (the Anti-Trafficking Directive).

In March 2015 the Coalition Government enacted the Modern Slavery Act 2015. The Act aims to consolidate and clarify existing modern slavery and human trafficking offences and increased the maximum sentences for committing these offences.

The National Referral Mechanism

The National Referral Mechanism (NRM) provides a framework to identify, refer and record potential victims of modern slavery.

There are five stages in identifying a potential victim and their journey through the NRM.

- 1 Identification of a potential victim (PV)
- 2 Referral into NRM by a first responder
- 3 Reasonable grounds decision
- 4 Support for victim with a positive reasonable grounds decision
- 5 Conclusive grounds decision by a competent authority

How to report suspicions?

There is a legal duty for first responders such as the police or local authority employees to report victims of modern slavery to the Secretary of State.

Cases involving children must always be reported.

Adult victims need to provide consent for the referral to be made if they have capacity. If consent cannot be obtained, the first responder still has the duty to notify the Home Office and can do so using the MS1 form.

If you would like to discuss your concerns with social services, please contact:

- **The Modern Slavery Team on 020 8132 2154**
- **The Enfield Multi-Agency Safeguarding Hub Adults on 020 8379 3196**
- **The Enfield Multi-Agency Safeguarding Hub Children on 020 8379 5555**
- **The Police on 101 or CrimeStoppers on 0800 555 111**

Remember in an emergency, when someone is being abused, call the police on 999.

Appendix 2: Questions you could ask

There are often many barriers, including language, preventing someone from answering 'yes' to the question, 'are you a victim of modern slavery'? Avoid questions which could re-traumatise individuals and focus on open, needs-led questions.

The following questions could be asked if it is safe to do so. Conversations should be held in a safe setting, with qualified interpreters if required. Survivors shared that they need time to build up trust but that it was important people asked the questions and were open-minded and listened to the answers.

1. Do you feel safe?
2. Is anyone making you do something you don't want to?
3. How many hours a day do you work?
4. Are you being paid for your work?
5. Do you have access to your bank account?
6. Who would you call if you needed help?
7. Can you tell me about your situation?

Signs to look out for

Below are some indicators that someone may be experiencing modern slavery or exploitation. It is important to recognise that everyone responds differently and that this list is not exhaustive:

- Fearful, anxious or distrustful of authorities
- Appears malnourished
- Shows signs of trauma (physical/psychological)
- Suffers injuries that may be the result of controlling measures or that have been left untreated
- Unfamiliar with local language/context
- Do not know their home or work address
- Has a story that sounds rehearsed
- Dependency and presence of a Controller – allows others to speak for them when addressed directly
- Believe they have debt to pay off
- Separated from their ID documents
- Do not have any days off or unable to leave their work environment
- Has limited/no social interaction
- Reveals threats have been made against them or their family

Appendix 3: Action Plan

Priority 1: Increase awareness and knowledge to identify victims

Goal	Action required	Person responsible	End date
Focus on raising awareness by sharing posters to the organisations based in the various industrial estates within the borough and physically visiting them to request these are advertised in their staff/office areas.	To identify the numerous industrial estates within Enfield in order to schedule regular days of action to ensure all areas are covered.	Modern Slavery Team	March 2023
Develop a training plan jointly with health and the Police on cuckooing, to deliver to professionals to raise awareness in this area.	Jointly with Police colleagues deliver this to professionals.	Modern slavery Team and Police	Dec 2023
Continue to promote our training awareness sessions and offer to internal departments and external partner agencies.	Identify teams and services with training gaps.	Modern Slavery Team	March 2023
Ensuring we are collecting quality data to be inclusive of the ethnicity and nationality within the wider community.	Capture Nationality and Ethnicity details separately where possible.	Partners required to share data with Modern Slavery Team	Ongoing
Working closely with Police partners to gather information and share intelligence in a timely way to aid further investigations.	Use systems to gather relevant information and share intelligence.	Modern Slavery Team/ Police	March 2023
Creating and sharing a checklist of immediate responses required from professionals regarding concerns of cuckooing, and also a checklist of other support available.	Once checklist is created share with all partner agencies.	Modern Slavery Team	Dec 2022

Priority 2: Work in partnership to prevent exploitation

Goal	Action required	Person responsible	End date
Review referral pathways in order to identify room for improvement.	Processes to be revised regularly.	Modern Slavery Team/ MS Board	March 2023
Support services directory to be kept up to date in order to be able to signpost survivors appropriately.	To revise support services directory quarterly and keep up to date.	Modern Slavery Team	Ongoing bi yearly
A yearly conference for NGOs and government organisations to be held to discuss and share ideas in the context of Modern Slavery.	To organise and invite a wide range of different professionals and possibly lived experience individuals.	Modern Slavery Team	Oct 2022
Assist Social Care teams with NRM referrals to ensure these are being completed and quality information is being gathered and shared.	Liaise with first responders with a view of developing an NRM workshop to ensure they are aware of how to correctly submit an NRM.	Modern Slavery Team	March 2023

Priority3: Enhance information sharing to bring perpetrators to justice

Goal	Action required	Person responsible	End date
Power BI Mapping exercise being developed in order to identify trends in crime hotspots, exploiter locations and NRM/DTN referrals etc.	To update Power BI on a monthly basis with all information to keep up to date records.	Modern Slavery Team/ Knowledge and Insights Hub	March 2023
Supporting Police partners in active operations including locations/visits.	Ensure as much quality information as possible is gathered from referrer and relevant sources and recorded in order to be shared.	Modern Slavery Team/ other LBE departments/ External services	Ongoing
Multi agency working across boroughs and other external organisations and internal departments.	To develop information sharing with other boroughs and organisations.	Modern Slavery Team/ other LBE departments/ External services	March 2023

Priority 4: Deliver the right care pathways to support survivors

Goal	Action required	Person responsible	End date
Maintain links with departments such as housing, social care and charity organisations who provide direct support to our survivors.	To continue to attend relevant meetings/boards to maintain this link within each service and share information. Request regular updates from NGO's regarding victim feedback and survivors current circumstances.	Modern Slavery Team	March 2023
Using internal communications in order to advertise forums, yearly conference and other significant events.	Staff matters or Internal Communications.	Modern Slavery Team/Corporate Communication Team	Oct 2023
Continue Power BI Mapping exercise to map and identify trends in the information that we receive in order to focus resources into protecting potential victims.	To ensure all data is sent to KIH team on a monthly basis.	Modern Slavery Team/ Knowledge and Insights Hub/Police	Quarterly – Ongoing
Promote the team with a focus on local businesses – distributing information, cards/leaflets.	Focus on local businesses to raise awareness	Modern Slavery Team	March 2023

