





# Toolkit for Building a Human Trafficking School Safety Protocol

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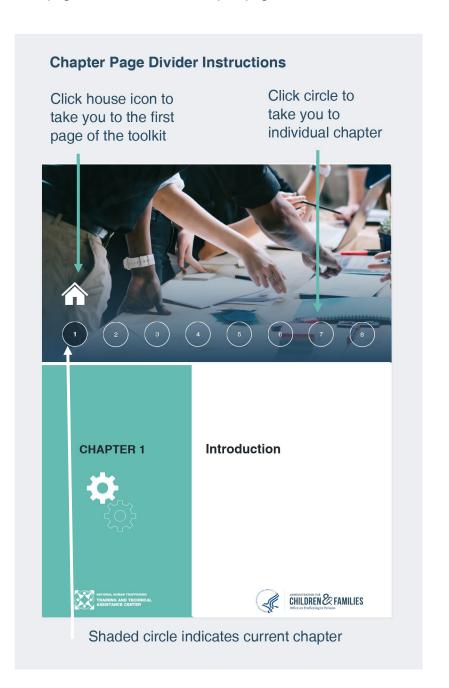
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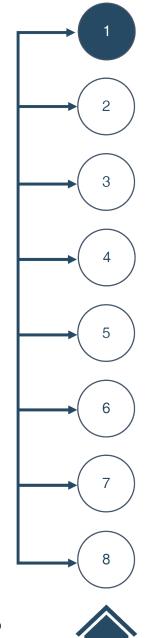
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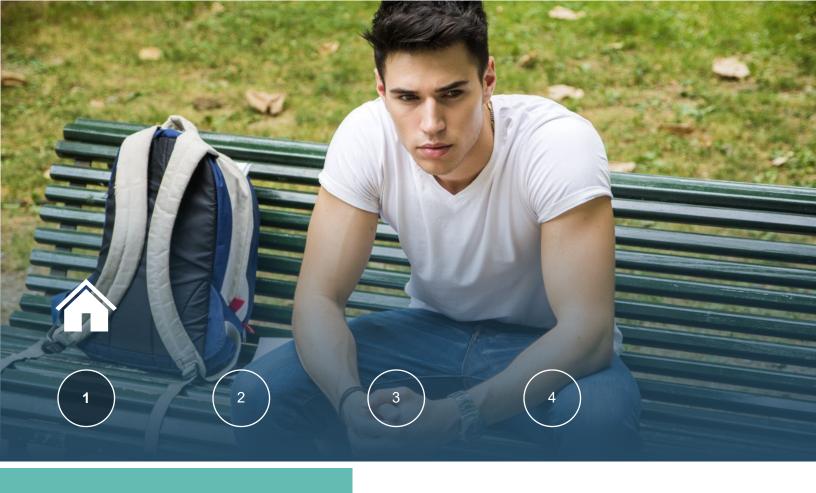
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## **CHAPTER 1**



# Introduction

### **Chapter 1: Introduction**

# Understand the Purpose of a Human Trafficking School Safety Protocol

School districts play an important role in preventing human trafficking and intervening when a student may be experiencing trafficking. Many tools can help schools identify and respond to human trafficking, like staff training, student prevention education, and a human trafficking school safety protocol (HTSSP). The purpose of an HTSSP is to:

- 1. Identify students that may be experiencing trafficking or may have an increased risk for trafficking
- 2. Ensure educators and other staff comply with mandatory reporting laws
- 3. Ensure the safety of students, educators, and other staff when reporting human trafficking and other forms of violence
- 4. Help students connect to service providers and/or programs intended to reduce further exposure to violence and victimization

The guidance in this toolkit will help schools and school districts plan, develop, and implement an HTSSP, ensuring consistent support is offered to all students impacted by trafficking.

### **Define and Establish Guiding Principles**

Before developing an HTSSP, it's important to identify guiding principles. Below are some critical guiding principles to consider. These guiding principles are highlighted throughout this toolkit to create an overarching framework to encourage a positive learning environment where all students receive equitable supports and services and all staff feel supported in their roles. These principles are essential in supporting students affected by trafficking and will serve as a collaborative agreement for how the school district, schools, school personnel, community service providers, and governmental entities (e.g., child protective services, law enforcement) will partner together as they implement the HTSSP.

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### **Guiding Principles**

Culturally and Linguistically Appropriate Students come from a vast range of cultural backgrounds and speak various languages. Schools and communities must prepare to offer culturally and linguistically appropriate services.

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Multidisciplinary

Students may require different services, some of which schools can only provide through partnerships with a multidisciplinary team of professionals. Schools are encouraged to develop a multidisciplinary team.



Data-Driven

An HTSSP should be driven by data and incorporate lessons learned from monitoring and evaluation. Schools are encouraged to create systems to track the use of the HTSSP and outcomes.



Inclusive of All Types of Human Trafficking

Schools must ensure the HTSSP is equipped to recognize and respond to sex and/or labor trafficking experienced by students and/or their families



Trauma-Informed and Person-Centered A trauma-informed environment avoids re-traumatization by prioritizing safety, autonomy, and respect. Person-centered care prioritizes the individual's wishes, safety, and well-being.

Survivor-Informed

Individuals with lived experience provide invaluable insight and expertise. They can support an HTSSP by strengthening identification and response and should be included throughout all phases of planning, development, and implementation.

**Equity Focused** 

An equity-focused school commits to meeting the individual needs of all students while recognizing historical and systemic inequities. An HTSSP must incorporate diverse needs while interrupting the policies, practices, and systems that contribute to marginalization and disproportionate exclusion.

### Consider Individuals Who May Disproportionately Experience Trafficking



Simpson, J. (2009). Everyone belongs: A toolkit for applying intersectionality. Canadian Research Institute for the Advancement of Women. <a href="https://www.criaw-icref.ca/en/product/everyone-belongs--a-toolkit-for-applying-intersectionality">https://www.criaw-icref.ca/en/product/everyone-belongs--a-toolkit-for-applying-intersectionality</a>

Although any student can experience trafficking, when developing your HTSSP, pay close attention to students who are a part of communities that have been economically and socially marginalized and may have additional needs to consider. Be aware of the unique intersectional circumstances of a student's personal experience. For instance, recognize the special considerations for a student of the Two-Spirit lesbian, gay, bisexual, transgender, queer, questioning, intersex, asexual, plus (2SLGBTQIA+) community. The same student may also be experiencing homelessness and have a history of child welfare involvement. Because school staff may not fully know a student's circumstances, it is critical to create trauma-informed environments, address biases, and ensure that all individuals implementing the HTSSP prioritize the safety and well-being of

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students. For more information, see <u>Appendix A: Special Considerations for Individuals Who</u> May Disproportionately Experience Trafficking.

### **Equity and Human Trafficking Prevention**

Student inequity and exclusion can create vulnerabilities, increasing the risk of human trafficking. For example, Black, Indigenous, and Latino students and students with disabilities are disproportionately impacted by harsh discipline and suspension (Losen & Martinez, 2020). School detention or suspension can negatively impact student performance, hinder peer relationships, and increase isolation. Consider policies that address compliance with school expectations. Schools could instead provide:

- Implementation of restorative and transformative practices
- · Referrals to social and emotional supports

Emphasizing connection, expanding student support, and addressing the inequities in school policies can create an inclusive environment that increases student protection.



### Resources

#### Information:

- » Individuals With Disabilities May Face Increased Risk of Human Trafficking
- » Safety Planning With Foreign National Children and Youth Survivors of Trafficking
- » How Can Communities Assess and Respond to Risk Factors Among Migratory Families In Order to Reduce Vulnerabilities and Prevent Labor Trafficking?
- » Immigrant Survivors Fear Reporting Violence
- » Human Trafficking Prevention: Strategies for Runaway and Homeless Youth Settings
- » The McKinney-Vento Homeless Assistance Act
- » On-Ramps, Intersections, and Exit Routes: A Roadmap for Systems and Industries to Prevent and Disrupt Human Trafficking
- » LGBTQ+ Communities and Human Trafficking
- » How to Improve Services for Males Experiencing Trafficking
- » Assisting Male Survivors of Human Trafficking
- » How the Child Welfare System Works
- » Youth Involved With the Juvenile Justice System
- » Human Trafficking in America's Schools: What Schools Can Do to Prevent, Respond, and Help Students to Recover From Human **Trafficking**
- » Toolkit for Building Survivor-Informed Organizations
- » National Advisory Committee: Best Practices and Recommendations for States
- » Youth Trafficking: Systems of Care
- » Adverse Childhood Experiences and Social Determinants of At-Risk Populations
- » Restorative and Transformative Justice Toolkit
- » Checklist to Address Inequities and Barriers for Human Trafficking Survivors and Communities of Color

#### Training:

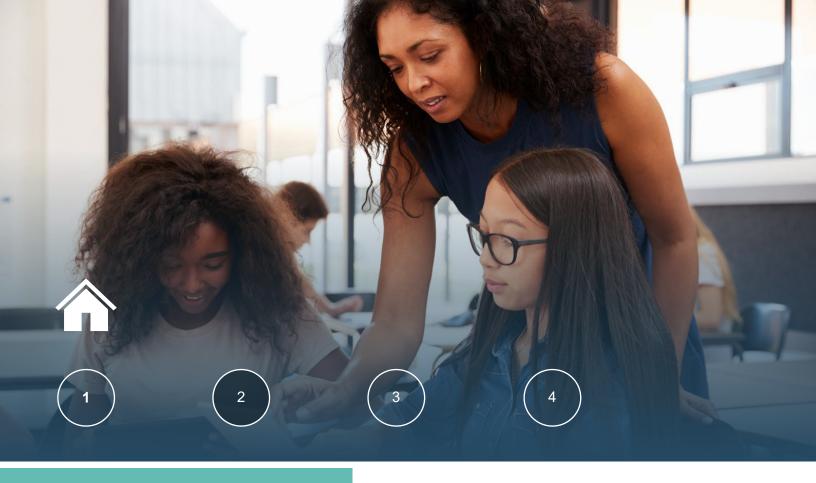
- » Human Trafficking and Individuals With Disabilities
- » Addressing Human Trafficking in America's Schools Webinar Series











## **CHAPTER 2**



# Plan the Development of the HTSSP





### **Chapter 2: Plan the Development of the HTSSP**

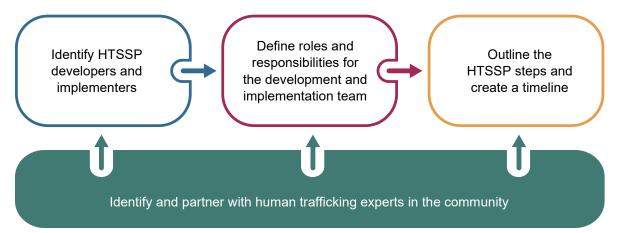
### Steps to Plan the Development of the HTSSP

Protocols can be created from scratch, adapted from another school or district's HTSSP, or modified from a current school protocol (e.g., protocols that respond to students experiencing child abuse, relationship violence, or sexual assault).

Several factors influence the development of an HTSSP. These include:

- State legislative mandates or State Board of Education rules and/or regulations
- Requirements for specific grants and/or community-based collaborations
- Advocacy efforts of school professionals, parents and caregivers, and/or students

Once you are ready to proceed, there are four steps in the planning stages of an HTSSP:



### 1. Identify HTSSP Developers and Implementers

Begin by convening a small, diverse committee of school representatives within your school system to manage strategic planning and meeting facilitation. This committee of professionals will have roles in the development and implementation of the HTSSP. Consider those who positively approach brainstorming opportunities or may have worked on other types of protocols that focus on student well-being.

Potential Individuals for Development and Implementation of the HTSSP		
School administrators	<b>✓</b> Teachers	
✓ Paraprofessionals	<b>✓</b> Counselors	
Social workers	School nurses	
Individuals with experience in evaluation	▼ Resource officers	
Individuals who have experienced trafficking	✓ Student representatives	











Potential Individuals for Leadership Roles		
$\checkmark$	Program coordinators	
V	Youth counselors	
V	Youth advocates	

Identify a smaller group of individuals within the school or district best positioned to take on leadership roles in development and implementation. These individuals should have more advanced human trafficking knowledge within the community.





During the HTSSP developer and implementor selection process, ask:

- Who has experience developing or implementing child abuse or violence prevention protocols, policies, or procedures?
- Who has received human trafficking training and/or would rate their knowledge and comfort level with the topic as high?
- Who has previously participated in school-based or community efforts to raise awareness of the issue?
- Who has contacts or professional relationships with local experts or programs addressing the human trafficking of minors in the community and/or governmental entities (e.g., child protective services, law enforcement) responsible for responding to reports of child abuse?
- Who (if any) are the already designated personnel responsible for elevating and reporting abuse?
- What resources would the identified staff need to participate in this project (e.g., coverage, financial support for specialized training, money allocated for accessing consulting services, meeting space)?

Once identified, the development team should focus on increasing their human trafficking knowledge and competency by engaging in training, research, and partnership building with human trafficking experts.

### 2. Define Roles and Responsibilities for the Development and Implementation Team

Once you have identified the team focusing on protocol development and implementation, the next step is to delineate roles and responsibilities clearly. Consider who will:

- Review current protocols, determine guiding principles, and write the HTSSP
- Provide training on the HTSSP
- Identify partnership opportunities and build relationships with referral sources
- Decide what information to collect for evaluation, develop tracking systems, and collect data
- Obtain approvals for implementing the HTSSP and any revisions

### 3. Outline the HTSSP Steps and Create a Timeline

Outlining the HTSSP steps and creating a timeline is almost as important as choosing the development team. The development steps will include (1) creating the HTSSP, (2) launching and implementing the HTSSP, and (3) assessing outcomes and updating the HTSSP. The development steps should include setting specific goals, identifying the chronological order of







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events, detailing the project's boundaries, delegating specific responsibilities, and incorporating a timetable. Develop SMART action items.



Wikimedia Commons (2016, December 20). SMART goals. https://commons.wikimedia.org/wiki/File:SMART-goals.png

SMART action items are — specific, measurable, attainable, relevant, and time based. This means we want action items that are:

- ✓ Specific: Clear about a specific accomplishment or action you would like to achieve.
- Measurable: Make sure your goal is written to track progress easily.
- ✓ Attainable: Realistic it doesn't have to be easy, but you should be able to map a clear path to accomplish it.
- ✓ Relevant: Related to your work/mission you should feel comfortable advocating for the goal.
- ✓ Time Based: The goal and action items should be time-bound.

Consider creating an HTSSP development timeline and checklist to keep your tasks on track. For more information, see Appendix B: HTSSP Development Timeline and Checklist.

When the responsibilities, steps, and timeline are established, the HTSSP developers can prioritize the types of resources and partnerships needed, effectively use the time allocated for the project, and conceptualize the final product. Consider aligning the timeline with your academic calendar in a way that is realistic for staff capacity and maximizes staff availability.

### 4. Partner With Human Trafficking Experts in the Community

Human trafficking experts are essential and can provide support through (1) writing the HTSSP, (2) providing context and reasoning behind the HTSSP steps (3) equipping developers with guidance and support, and (4) providing valuable resources and support to students, family, and staff during implementation. The experts you engage must be committed to inclusive, trauma-informed practices, or your guiding principles could be compromised, reflect bias, and exclude populations of students experiencing increased risk factors.

	Partners Who May Be Human Trafficking Experts in the Community				
$\checkmark$	Child welfare agencies				
V	Court systems				
V	Legal service providers				
V	Human trafficking tasks forces				
V	Indigenous children and youth service providers				
$\checkmark$	Individuals who have experienced trafficking				
V	Law enforcement				
V	Local coalitions				
V	Runaway and homeless youth providers				
V	2SLGBTQIA+ service providers				
V	Service providers supporting foreign national youth and families				
$\checkmark$	Service providers supporting individuals with disabilities				
V	Service providers supporting youth involved in juvenile justice systems				

After the initial planning meetings, team leads should expand the HTSSP development team by partnering with human trafficking experts within the local community and communities disproportionately affected by trafficking. This cross-system coordination will help schools better understand the scope and prevalence of human trafficking in their communities and coordinate preventative measures and wraparound services for youth, an important component of the school's protocol and response to trafficking (National Center on Safe Supportive Learning Environments, 2014; Office of Safe and Supportive Schools, 2021).











During your meetings and interviews with potential partners, consider asking the following questions:

Questions to Expand Your Partnerships		
Are there local points of contact for referrals or consultation when school staff identify indicators of trafficking?	<b>√</b>	
Who are well-known advocates with lived experience in your community?	<b>√</b>	
What prevention and intervention services are available in this community, and what is the referral process?	<b>√</b>	
Do your state's child protective services (CPS) investigate both sex and labor trafficking?	1	
What conditions are placed upon your state's child welfare system's ability to investigate trafficking (e.g., the trafficker must be a parent/caregiver)?	<b>√</b>	
Do you evaluate your services regularly and update them based on outcomes?	1	
Are other barriers preventing partner organizations from investigating and accepting cases for all children?	<b>√</b>	
Are educational, training, and consultation resources available for school administrators, personnel, and students?	<b>√</b>	
Are there task forces, law enforcement units, or other programs or individuals in this community to prevent, investigate, and/or intervene in cases involving youth with increased risk factors for trafficking?	✓	
What are the most appropriate services in your community to support students who may disproportionately experience trafficking? For more information, see <a href="Appendix A: Special Considerations">Appendix A: Special Considerations</a> for Individuals Who May Disproportionately Experience Trafficking.	✓	

Questions to Assess Knowledge and Compatibility	
Can you define human trafficking or describe how human trafficking presents in your community?	<b>√</b>
Are you aware of developed and successfully implemented human trafficking protocols with children and youth in your community?	✓
Are potential partners' resources/services trauma-informed, person-centered, accessible, and inclusive to all students?	✓
What trends are you seeing in the trafficking and exploitation of youth in your community?	1
What are the most common grooming and recruiting tactics used in your community?	1
Are your organizations trained in working with youth who may disproportionately experience trafficking?	<b>√</b>
Do you offer culturally and linguistically appropriate services and supports?	1

When building partnerships, if you cannot find resources and experts locally, you can connect with your closest city or town that has trafficking-specific resources using the <u>National Human Trafficking Hotline Referral Directory</u> or expand your search to a region rather than a town/county. Seek support from your community providers and local community task forces to understand how human trafficking intersects with other issues, like dating violence, bullying, safety planning, sexual assault, online safety, youth experiencing homelessness, basic needs services, adolescent health programs, and life skills. Partnerships can incorporate services addressing the needs that increase your students' risk factors for trafficking and services that strengthen their protective factors.



### Resources

#### Information:

- » Toolkit for Building Survivor-Informed Organizations
- » National Human Trafficking Hotline Referral Directory
- » What to Know: Municipal Response to Human Trafficking

#### Organizations:

- » National Survivor Network
- » U.S. Advisory Council on Human Trafficking
- » Survivor Alliance

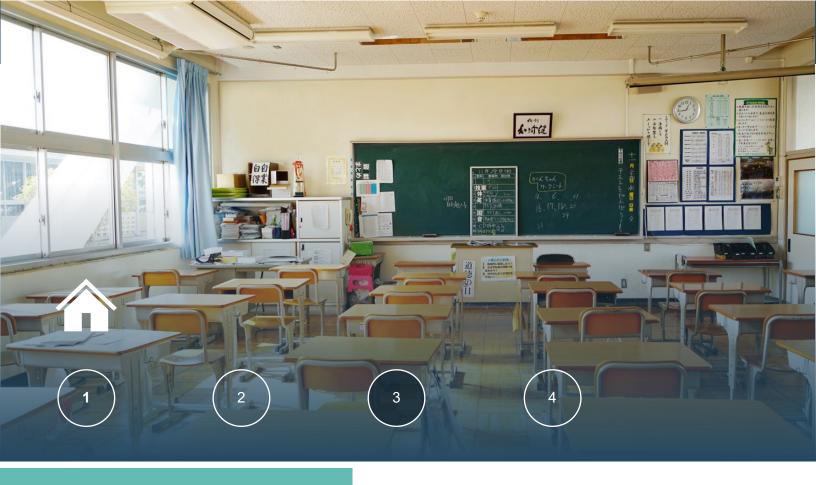












# **CHAPTER 3**



# **Develop the HTSSP**

### **Chapter 3: Develop the HTSSP**

The goal of an HTSSP protocol is to (1) identify students that may be experiencing trafficking or have an increased risk for trafficking, (2) ensure educators and other staff comply with mandatory reporting laws, (3) ensure the safety of students, educators, and other staff when reporting human trafficking and other forms of violence, and (4) help students connect to service providers and/or programs intended to reduce further exposure to violence and victimization. Be sure to incorporate these goals into the basic elements. If your HTSSP is a lengthy document, consider providing a quick reference guide or shortened version for situational awareness.

For more information, see <u>Appendix C: HTSSP Template</u>.

### **Elements of an HTSSP**

The HTSSP must be an easy-to-follow guide with concrete action steps and clear sections. Include the following:



### 1. The Federal and State Definitions of Human Trafficking

The federal and state definition of human trafficking should be included in all protocols: The Trafficking Victims Protection Act of 2000 (TVPA), as amended (22 U.S.C. § 7102), defines 'severe forms of trafficking in persons' as:

 Sex trafficking: the recruitment, harboring, transportation, provision, obtaining, patronizing, or soliciting of a person for the purpose of a commercial sex act, in which the commercial sex act is induced by force, fraud, or coercion, or in which the person induced to perform such act has not attained 18 years of age; (and)











Labor trafficking: the recruitment, harboring, transportation, provision, or obtaining of a
person for labor or services, through the use of force, fraud, or coercion for the purpose of
subjection to involuntary servitude, peonage, debt bondage, or slavery (Administration for
Children and Families, 2017).

State definitions should also be included. See the <u>Child Welfare Information Gateway</u> to search for state statutes on human trafficking laws.

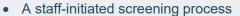
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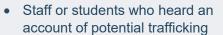
# 2. Staff Roles and a Process for Addressing Student Disclosures and Reports From Staff and Students

The HTSSP must clearly delineate the scope of staff roles in each step of the reporting process to indicate who will participate in an investigation, where appropriate, and who will provide further support, like counseling. Additionally, identify who the backup supports will be if these individuals are unavailable. Suspicion or disclosures of human trafficking and other forms of violence must be reported in accordance with your state's child abuse reporting laws and other abuse and violence protocols. At a minimum, include the following information:



Students experiencing human trafficking may be identified by:











Tollowing information.		
Who Is Responsible	Primary Responsibility	Potential Steps
All school personnel	Responding when concerned about a student or there are opportunities to support a student	<ul> <li>Observe for <u>risk factors</u>, human trafficking, exploitation, and other physical and emotional needs</li> <li>Refer the student to support programs or for assessment and/or intervention</li> <li>Elevate to administrators when aware of human trafficking recruitment on campus</li> <li>Utilize universal education or screening</li> </ul>
Designated staff (e.g., school counselors, social workers, school-based mental health professionals, district human trafficking prevention specialists, human trafficking coordinators)	Responding when human trafficking is indicated, identified, or disclosed	<ul> <li>Provide human trafficking education or screening</li> <li>Provide support to the student and other school personnel</li> <li>Assess for immediate needs and safety</li> <li>Report human trafficking in accordance with federal and state law and the HTSSP</li> <li>Provide coordination of the HTSSP and follow up if appropriate</li> </ul>
Staff receiving disclosure or designated staff	Reporting human trafficking through mandated reporting process	<ul> <li>Report human trafficking in accordance with federal and state law and the HTSSP</li> <li>Provide coordination of the HTSSP and follow up if appropriate</li> </ul>

<sup>\*</sup>Note: a student disclosure of human trafficking is not required

### **Addressing Disclosures**

If a student shares information about their trafficking experience (disclosure), the goal is to understand the individual's circumstance and connect them to the most appropriate services and resources.

When students disclose trafficking, school staff should:

- · Reinforce they believe the student and that the student is not at fault for the trafficking
- Provide trauma-informed, person-centered responses, which include responding to students with a nonjudgmental attitude and genuine concern for the student's well-being
- Validate student's feelings (e.g., fear, shame, embarrassment, anger)
- Maintain confidentiality wherever possible
- Inform the student about any requirements for reporting
- Report the trafficking and/or abuse and refer the student for further supports

Students experiencing trafficking may:

- Fear no one will believe them
- Not be able to identify themselves as having experienced human trafficking
- Live with their trafficker or depend on their trafficker for communication and/or basic needs
- Receive threats of harm, abandonment, exposure, or deportation if they report their trafficker or their trafficking experience
- Fear deportation or other legal consequences for themselves or their family members
- Receive threats of harm to their siblings or other family members if they report their trafficker or their trafficking experience

### 3. Human Trafficking Screening and Universal Education Information

Universal education and screening are two different ways to approach students if there is concern about human trafficking. School staff may choose to use one or both. Understanding the indicators and factors of human trafficking within the community will clarify which approach will work best for the school or district. <u>Universal education and screening</u> tools should incorporate sex and labor trafficking information.

#### **Universal Education**

**Goal:** Offer all students information about violence and exploitation to normalize the conversation and allow the student to consider whether it applies to their circumstances

- Allows for open discussions about violence and human trafficking
- Incorporates multiple pauses for students to ask questions, share information, and/or seek help
- Can reach more students for both prevention and intervention

#### Screening

**Goal:** Identify the possible presence of risk factors for human trafficking using a standardized set of questions; screening may be offered to all students or only to those within a particular group

- Determines a student's health and behavioral risks that may be connected to trafficking
- Can help staff determine which services and resources to recommend
- Conducted ONLY with a pre-determined population

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### **Screening Tool Examples:**

### **Validated Screening Tools**

<u>Commercial Sexual Exploitation-Identification Tool (CSE-IT)</u>: Developed by the WestCoast Children's Clinic to identify sex trafficking among youth across service provision settings; validated in 2017

<u>Human Trafficking Interview and Assessment Measure (HTIAM-14)</u>: Developed by Covenant House to identify trafficking among young adults ages 18 through 23 experiencing homelessness in service provision settings; validated in 2013

<u>Short Screen for Child Sex Trafficking (SSCST)</u>: Developed by Children's Healthcare of Atlanta and its medical staff to identify adolescents experiencing sex trafficking in healthcare settings; validated in 2017

Quick Youth Indicators for Trafficking (QYIT): Developed by Covenant House New Jersey to identify labor and/or sex trafficking among young adults ages 18 through 22 experiencing homelessness in service provision settings; validated in 2018

Rapid Appraisal For Trafficking (RAFT): Developed by Makini Chisolm-Straker to identify human trafficking in emergency room settings; validated in 2021

#### **Evidence-Based Tools**

<u>Human Trafficking Screening Tool (HTST)</u>: Developed by the Urban Institute, funded by the Office of the Assistant Secretary for Planning and Evaluation and Administration for Children and Families, to identify minors who have experienced trafficking who are in the child welfare system, have run away, or are experiencing homelessness

This is not an exhaustive list; please research what tool may be the best fit for your school/district. To learn more, take the SOAR online module, <u>Universal Education</u> and <u>Screening</u>.

Once a screening tool is decided, schools should determine (1) which staff will implement the screening tool and/or which staff will provide universal education, (2) what criteria will be used to determine which students receive either/or, and (3) what the referral process will look like.

All staff providing screenings or universal education should know their next steps, including where to refer a student with indicators of trafficking. See example below. Addressing human trafficking screening and universal education will meet HTSSP protocol goal 1: Identify students that may be experiencing trafficking or may have an increased risk for trafficking.

 Legal Obligations of a Mandated Reporter and the Process for Reporting Human Trafficking

Once human trafficking is indicated, identified, or disclosed, school staff must provide immediate assistance. The HTSSP should include a step-by-step guide for schools to follow,

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outlining procedures for reporting to authorities and a guide for providing follow-up support for the student, parents, guardians, and/or caregivers.

School personnel are considered <u>mandated</u> <u>reporters</u>. This means they must legally report confirmed or suspected child abuse or neglect. See the <u>Child Welfare Information Gateway</u> to search for state statutes on mandated reporter requirements.

Some circumstances may require law enforcement, special investigator, juvenile probation officer, school resource officer, and/or child welfare system involvement. Develop relationships with law enforcement officers trained on trauma-informed and motivational interviewing practices to ensure all



School administrators or designated staff may have to report the following:

- 1. Human trafficking
- Concerns of human trafficking recruitment in the school and/or district
- 3. Threats to the safety of students, staff, and/or the school community











processes are rooted in the student's best interest. It is important to vet law enforcement for their responses to these reports, to ensure students won't be criminalized for their experiences or face immigration barriers when seeking help.

When creating your HTSSP, review your school/district's existing mandated reporting policies and assess for needed updates. Be sure to include the following:

- Immediate support for the student
- Instructions for reporting to Child Protective Services and appropriate authorities
- Instructions for which designated school staff to notify for further guidance

These steps, in addition to (1) requesting assistance for foreign national minors who have experienced trafficking and (2) communicating with parents, guardians, and caregivers, when it is safe and appropriate, should be followed through during the mandatory reporting process.

Addressing mandated reporting will meet HTSSP protocol goal 2: Ensure educators and other staff comply with mandatory reporting laws.

Example:	Staff Who Suspect Trafficking Will:
Step 1	Escort the student to [staff counselor] or refer the student or peer who reported to [staff] to assess immediate needs and ensure follow-up support.
Step 2	Following mandated reporter requirements for the state of [state], all district employees who suspect trafficking will file a report within [number of hours] to [contact information]. [Note: Include instructions for a follow-up written report if required].
Step 3	Notify [staff] at [contact information] if a human trafficking report was submitted and to gather further guidance.
Step 4	[Staff] to contact [law enforcement] at [contact information], coordinate response, and assess campus impact by [list steps needed to assess campus impact].
Step 5	[Staff] to contact parent/guardian if appropriate.
Step 6	If applicable, submit a request for assistance on behalf of foreign national minors through the Shepherd Case Management System.

<sup>\*</sup>Note the order of these steps may differ based on state laws and district policies and procedures.

Request Assistance for Foreign National Minors Who May Have Experienced Trafficking

In accordance with the <u>Trafficking Victims Protection Act of 2000</u>, as amended, federal, state, and local officials with information about foreign national minors who *may have* experienced human trafficking must refer cases to the U.S. Department of Health and Human Services' Office on Trafficking in Persons (OTIP) within 24 hours. OTIP will assist foreign national minors in gaining eligibility for benefits and services in the United States. Requests for assistance may be submitted through the <u>Shepherd Case Management System</u>.

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### **Foreign National Minors**

A minor who has experienced trafficking does not need to work with law enforcement to be eligible for assistance.

If eligibility is confirmed by OTIP, the student will qualify for services like:

- Medical screenings
- Public housing programs
- Trafficking-specific case management

And additional support from organizations/programs like:

- Temporary Assistance for Needy Families
- Medicaid
- State Children's Health Insurance Program
- Substance Abuse and Mental Health Services Administration
- Supplemental Nutrition Assistance Program
- Special Supplemental Nutrition Program for Women, Infants, and Children

For additional information, see Assistance for Child Victims of Human Trafficking.

#### Communicate With Parents, Guardians, and Caregivers

The HTSSP should outline parent, guardian, and caregiver communication when human trafficking is indicated, identified, or disclosed. Identify a designated staff member as the primary point of contact for the student's family, considering coordination with authorities (e.g., child welfare, law enforcement). The HTSSP should include the following support information:

- If, when, and who should communicate with parents/guardians/caregivers
- What schools are required to report to parents and guardians; see the <u>Child Welfare</u> <u>Information Gateway</u> to search for state statutes on the communication required
- Support services available for ongoing support. For more information, see 6: <u>Follow-Up</u> <u>Services and Supports</u>.

Because youth with increased risk factors for trafficking often lack support systems, it is important to strengthen family and community support to help mitigate the risk factors associated with trafficking, like homelessness and lack of social connection. Two-generation or whole-family

approaches to service provision involve working simultaneously with parents/guardians/caregivers and students. For more information, see 5c: <u>Ongoing Support Needs</u>.

There may be circumstances where the parent/guardian/caregivers are the traffickers, have knowledge of or are suspected of participating in the trafficking, or the trafficking results from neglect. School staff should convey this information to child welfare during the mandated reporting process, involve law enforcement, and refrain from contacting the household members directly.

## 5. Responding to Individuals Who Have Experienced Trafficking and Other Forms of Violence

When responding to individuals who may have experienced trafficking or other forms of violence, prioritize enhancing the student's feelings of safety and security. Be sure to inform the student if you are a mandated reporter before they begin sharing and be sure the student knows what that means and what will happen next. This creates trust in the reporting process.

### Protect and Maintain Student and Staff Confidentiality

Student and staff confidentiality is a key component of safety. The staff who make referrals to child welfare and the students who disclose information should have their identity and information protected from those outside the investigation to avoid concerns for potential retaliation. The HTSSP should include information about the importance of maintaining student and staff confidentiality wherever possible (e.g., only sharing information in the report with those required under the law or as stated in the protocol).

Refer to your school district's confidentiality policy. *Addressing confidentiality will meet HTSSP goal 3: Ensure the safety of students, educators, and other staff reporting human trafficking and other forms of violence.* 

#### Provide Student Support

The HTSSP should incorporate a process for student support. Consider addressing (a) immediate support needs, (b) needs related to integration back into the school system, if applicable, and (c) ongoing support needs.

To minimize student trauma during the reporting process, school staff should:

- Tell students of the plan to contact law enforcement, CPS, and/or parents/guardians/caregivers
- Address student concerns:
  - What can be done to mitigate those concerns?
  - Are there other steps that can be taken before contact?
  - What supports can be provided through the process?
- Consider the needs of students who may disproportionately experience trafficking
- Determine what impact law enforcement and CPS involvement may have on foreign national students, particularly regarding threats of deportation
- Comply with Family Educational Rights and Privacy Act (FERPA) and Health Insurance Portability and Accountability Act (HIPAA) confidentiality laws











- Only disclose necessary components of the crime, not personal opinions
- Ensure language or communication needs are met and include additional supports where necessary, like a trained advocate, interpreter, or translator
- Mitigate student trauma or negative stimulation that may arise during the reporting process
- Address accessibility needs within the physical environment

#### a. Immediate Needs

Students identified as experiencing increased risk factors or having experienced human trafficking must receive support for their immediate needs (e.g., emergency housing, food, clothing, medical treatment, legal representation). Be sure your community partnerships include resources for all immediate needs.

A safety plan can address immediate safety needs. Students may benefit from participating in the creation of a safety plan and the opportunity to learn safety planning skills. At a minimum, a safety plan should address the following:

- Situations that may pose the highest risk for students
- Safe adults the student can access at school, at home, and in the community
- Resources and hotline numbers
- Strategies to help the student calm down and manage stress
- If applicable, the name and contact information for the student's service team

For an example student safety plan, see Appendix C: HTSSP Template.

### b. Needs Related to Integration Back Into the School System (if Applicable)

Students who have experienced human trafficking may have experienced inconsistent schooling or large gaps in attendance. Schools can and should play a key role in reintegrating students into the education environment, even if the trafficking occurred at another school.

A student support plan can detail the educational and mental health supports the school will provide and who will provide this support. School staff should also regularly reassess the student support plan to ensure all supports continue to meet student needs. For an example student support plan, see <a href="#">Appendix C: HTSSP Template</a>.

### c. Ongoing Support Needs

The HTSSP should consider ongoing supports for students and their families. For families, schools may be able to use creative ways to engage the entire family in trafficking prevention and response efforts. This can include:

- Parent/caregiver awareness programs on the dangers and indicators of child trafficking
- Family interventions, including counseling, legal aid, and immigration services
- Partnering with local agencies to address basic needs at the school, like a food pantry
- Parent/caregiver trainings and support groups following the identification of a trafficking situation











Part of helping students become resilient is giving them the skills to advocate successfully and problem-solve for themselves in their different relationships with peers and adults. Involve students in choosing needed ongoing supports.

### 6. Follow-Up Services and Supports

The HTSSP should include a wide range of culturally and linguistically appropriate, trauma-informed services, and all service providers must provide equity in access and service provision. Once student and family service needs are identified, schools should make referrals to these services or work together with child welfare to ensure service referrals are made. Consider including the following services:

- Shelter and housing
- Food and clothing
- 2SLGBTQIA+-specific
- Case management
- Human trafficking-specific
- Legal aid
- Mental and behavioral health
- Disability advocacy and provider

Addressing student and family services or needs will meet HTSSP protocol goal 4: Help students connect to service providers and/or programs intended to reduce further exposure to violence and victimization.

While the data collection should not contain the identities of or connect back to individual students, schools should consider collecting data related to gender, age, orientation, race, ethnicity, and citizenship. Data should be collected to evaluate students impacted by trafficking, the resources provided, responses, and outcomes.

Schools must comply with all legal requirements regarding the confidentiality of protected health information and adherence to FERPA, HIPAA, and all other applicable legal and ethical requirements for information-sharing under certain conditions.

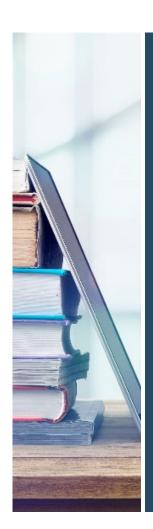












### Resources

#### Information:

- » Fact Sheet: Human Trafficking
- » Fact Sheet: Assistance for Child Victims of Human Trafficking
- » SOAR: Adverse Childhood Experiences
- » SOAR: Mandated Reporting and HIPPA Compliance
- » SOAR: Different Approaches to the Conversation: Universal Education and Screening Tools
- » SOAR: Screening and Universal Education: Choose Your Approach
- » SOAR: Protocol Components
- » Child Welfare Information Gateway
- » Victims of Trafficking and Violence Protection Act of 2000
- » Shepherd Case Management System
- » Grant Management Toolkit: Building Sustainable Anti-Trafficking Programs
- » Family Educational Rights and Privacy Act (FERPA)

#### Training:

- » SOAR: Universal Education and Screening
- » SOAR: Trauma-Informed Care













**CHAPTER 4** 



**Implement the HTSSP** 

### **Chapter 4: Implement the HTSSP**

Once previous steps are completed, the HTSSP is ready to implement. When preparing for the rollout, consider ways to make certain a whole-school approach is used when addressing human trafficking and supporting students. Doing so may include the following:

- 1. Providing school staff training and offering student prevention education
- 2. Ensuring safe space for students within the school or on campus
- 3. Monitoring the effectiveness of the HTSSP
- 4. Addressing needed revisions to the HTSSP

### **Provide Training Opportunities**

Prevention and intervention efforts in school settings are most effective, far-reaching, and sustainable when built and implemented through a whole-school and whole-student approach.

Providing trainings is an important step that will prepare school staff for their new responsibilities within the HTSSP. Trainings should provide space to ask questions, discuss scenarios, and apply new skills. When providing training, consider language and translation needs.

### **Staff Training Plan**

Develop a plan to train all school staff, incorporating translation where needed. This can include teachers and administrators, bus drivers, office staff, counselors, social workers, paraprofessionals, nurses, school resource officers, and contracted partners who provide site-based services.

Training should highlight the importance of school staff in protecting students and identifying warning signs that a student may be experiencing trafficking or are at increased risk of trafficking.

### 1. Foundational Training

Consider including information about human trafficking that is inclusive of both labor and sex trafficking, culturally and linguistically appropriate services, and trauma-informed care. All school staff benefit from information on the importance of racial equity.

It may not be possible to rely on individuals within the school to provide all trainings. Many organizations offer human trafficking training for educators. See the <u>resources</u> below for options.

### 2. HTSSP Training

Once the HTSSP is drafted and approved, staff training on the HTSSP is needed. All school personnel who play a role in implementation should be provided with clear information on the HTSSP components, their roles, and available resources. Additionally, the training should clarify that the protocol has been approved for use and that following the HTSSP is mandatory.

#### 3. Advanced Training

Due to their role within the HTSSP, certain staff will require additional training on the purpose, process, and follow-up of using a human trafficking screening tool and/or providing universal











education. Consider also adding information on safety planning, a multidisciplinary approach, and expanding trauma-informed care to include a healing-centered approach, focusing on holistic healing.

Level	Who	Topics	Frequency
Foundational	All school staff	<ul> <li>Human Trafficking: prevalence, risk factors, and indicators</li> <li>Responding to disclosures (as appropriate for their role)</li> <li>Trauma-informed care</li> <li>Culturally and linguistically appropriate services</li> <li>Racial equity</li> </ul>	New Hire and Annual
HTSSP	Designated staff	<ul> <li>The purpose and components of the HTSSP</li> <li>Staff roles in implementing the HTSSP</li> <li>Resources and supports within the HTSSP</li> </ul>	<ul> <li>New Hire and Annual</li> </ul>
Advanced	Designated staff	<ul> <li>Conducting screening and/or universal education</li> <li>Safety planning</li> <li>Multidisciplinary response</li> <li>Healing-centered engagement</li> </ul>	<ul> <li>New Hire and Annual</li> </ul>

#### **Student Prevention Education**

Consider integrating human trafficking student prevention education into your school system. Prevention education will provide students with the opportunity to build skills in:

- Recognizing risk factors and recruitment tactics
- Increasing protective factors
- Expanding help-seeking behaviors

Look for curricula and learning materials that incorporate meaningful equity-focused representation of all students. Ensure accessibility for all students by accompanying pictures with visual descriptions, including closed captioning in audio/video content, and address other special considerations for individuals who may disproportionately experience trafficking.

### **Ensure a Safe Space**

For students who have experienced trafficking, safety and security are primary concerns. If students do not feel safe, they will struggle to stay engaged in their education and may consider not attending school. Creating a safe space within the school will provide a calming place for students to retreat when experiencing stress, anxiety, or overstimulation. When creating a safe space, consider the following:

- How and when to access the space
- Who is available to listen and support the student when using the space
- How to incorporate student feedback when developing the space to ensure staff are not defining safety for students
- How to ensure student and staff safety when the student needs de-escalation or regulation when in crisis
- How to ensure the space is accessible to all











### **Creating a Safe Space**

When creating a calming, supportive environment, consider the following:

- Incorporating soft colors, natural light, and minimal décor
- · Keeping the space centered on the student's needs
- Refraining from displaying personal photographs of staff or students
- Including comfortable seating, sensory items, coloring materials, and soft instrumental music

Allow students to experience choice and control in the safe space by:

- Letting them choose where they want to sit, what kind of lighting they prefer, and/or what flameless candle or diffuser scent they want
- Allowing the student to define or modify aspects of the room

A safe space should not be used as a form of discipline. Students should not be forced to use the safe space if they do not identify the need, and access should not be denied as punishment.

#### Monitor and Evaluate the HTSSP

Capturing and analyzing data related to the steps in the HTSSP allows schools to closely monitor processes, assess which processes are the most effective, determine strategies for improving outcomes, and ultimately improve services for students. The HTSSP evaluation process should happen, at a minimum, annually to ensure that the HTSSP is effectively responding to students. However, if the need for modifications is evident, modifications can be made before the yearly review. See the resources below for more information on monitoring and evaluation.

### Create a Data-Tracking Plan

A data-tracking plan will allow schools to capture information about the use and effectiveness of the HTSSP. Portions of the HTSSP data may be tracked via the school's information system or other FERPA-protected databases. Information to consider when tracking data includes:

Data Tracking Plan		
Number of schools implementing the HTSSP	#	
Number of students identified as potentially experiencing human trafficking	#	
Number of potential human trafficking situations reported to child welfare	#	
Number of potential human trafficking situations reported to law enforcement	#	
Number of students referred to community resources or service providers due to potential trafficking concerns (and what resources or service providers) #		
Number of students who used a safe space within the school #		
Number of times students were able to transition back to class successfully after using a safe space	#	

While the data collection should not contain the identities of or connect back to individual students, schools should consider collecting data related to gender, age, orientation, race, ethnicity, and citizenship. Data should be collected to evaluate students impacted by trafficking, the resources provided, responses, and outcomes.

Schools must comply with all legal requirements regarding the confidentiality of protected health information and adherence to FERPA, HIPAA, and all other applicable legal and ethical requirements for information-sharing under certain conditions.



### Plan for Updates and Revisions to the HTSSP



After the HTSSP is implemented, the data collected may show areas that would benefit from a change of process or structure. Ideally, updates and revisions to the HTSSP will happen annually, informed by the data collected.



Keep in mind that the first year of using the HTSSP should only partially determine needed changes or success. It may take numerous years for the HTSSP to become institutionalized within the school system. Schools may need a few years of implementing, refining, and retraining to see the full impact of the HTSSP. Consider the success of helping even one student impacted by trafficking.



#### The Revision Team

The HTSSP development team (now the revision team) can provide updates and revisions. During the yearly review, the team should discuss the following:

- Gaps in services, provisions, or representation on the revision team having diverse staff and community partners reduces bias and blind spots
- Needed team changes if team members are struggling, overwhelmed, or experiencing burnout, consider resources to minimize compassion fatigue and secondary trauma

Re-evaluating who serves on the HTSSP team is important, from the entry-level staff to the principal or superintendent.

### HTSSP Revisions

When gathering feedback for updates and revisions, consider including the following individuals:

- School staff who have roles and responsibilities within the HTSSP
- Community partners who play support roles within the HTSSP
- Individuals with experience in evaluation
- Students and families who have been impacted by trafficking and supported by the HTSSP

Feedback may include the following:

- What services or programs did students/families report were most and least helpful?
- Are there gaps in services, and what ideas exist to bridge these gaps?
- What barriers were experienced by staff and students?
- Were plans of care, safety plans, and safe spaces effective and used as intended?
- Are there training needs, and were the trainings effective?

Once all feedback has been received and analyzed, discuss ways to improve the HTSSP and make the necessary changes. After changes are made, update the HTSSP training and provide the information to all school staff and community partners who implement the protocol. Remember that changing the HTSSP may require updating board policies or administrative regulations. The update and revision plan should account for this additional turnaround time.

The development and use of an HTSSP will ensure consistent support is offered to all students impacted by trafficking.

# 2

### **Revision Plan**

- [HTSSP revision team] to determine what feedback is needed, from whom, and in what format
- [School administration] to send out requests for feedback
- [HTSSP revision team] to review and incorporate feedback
- [HTSSP revision team] to submit HTSSP changes to [administration/school board] for approval
- [HTSSP revision team] to assess the need for changes or additions to resources
- [HTSSP revision team] to incorporate HTSSP revisions into the HTSSP staff training









### Resources

#### Information:

- » SOAR for School-Based Professionals: Creating a Safe Environment for Students
- » What Is Secondary Trauma?
- » Administration for Children and Families' Office of Planning, Research, and Evaluation
- » Human Trafficking Data Collection Project
- » Addressing Human Trafficking in America's Schools
- » SOAR: Secondary Effects of Trauma
- » National Human Trafficking & Disabilities Working Group
- » How Educators Can Eradicate Disparities in School Discipline
- » Sample Human Trafficking School Safety Protocols

### Trainings:

- » SOAR for School-Based Professionals
- » SOAR: Working With Foreign National Minors Who Have Experienced Trafficking
- » SOAR: Trauma-Informed Care
- » SOAR: Culturally and Linguistically Appropriate Services
- » SOAR: Responding to Human Trafficking Through the Child Welfare System











# Appendix A: Special Considerations for Individuals Who May Disproportionately Experience Trafficking

#### **Students With Disabilities**

Students with disabilities are three times more likely to be abused, neglected, and/or experience trafficking than students without disabilities (Sullivan & Knudsen, 2000). Misperceptions around disability can increase the susceptibility of students targeted by traffickers.

Students with disabilities may be put at increased risk of trafficking if they experience the following:

- Lack of accessible resources leading to isolation and segregation
- Dependency on a trafficker for care, communication, access to benefits, or mobility
- Bias related to the credibility of disclosure of abuse
- Threats of displacement or institutionalization

Schools can support students with disabilities by:

- Prioritizing accessibility and providing accommodations
- Partnering with disability subject matter experts to identify gaps in services
- Providing specialized training on <u>human trafficking and individuals with disabilities</u>

### **Students Who Are Also Foreign Nationals**

Students who are also foreign nationals, such as refugees, asylees, and migrant and seasonal workers, are considered to have increased risk factors for trafficking. Some students and/or their families may have experienced trafficking or other forms of violence in their home country or along their journey to the United States. Once in the United States, traffickers may continue to exploit their struggles.

Students who are also foreign nationals may be put at increased risk of trafficking if they experience the following:

- Obstacles in adapting to U.S. culture and laws
- Difficulty navigating language barriers
- Barriers to accessing financial resources
- Grief and loss due to separation from primary caregivers and other support systems

Schools can support students who are also foreign nationals by:

- Connecting students with legal services
- Offering support groups, mentorship, and mental health services
- Meeting social, emotional, and educational needs and providing prevention education

### **Students Experiencing Homelessness**

Students experiencing homelessness or unstable housing are put at increased risk of trafficking as they struggle to meet basic needs. Traffickers often fulfill these needs to build trust and create dependency with the intent of trafficking.

Students experiencing homelessness may be put at increased risk of trafficking due to the following:

- Instability in their living environment or access to supportive adults
- Struggles to obtain food, clothing, and/or shelter
- Exposure to violence and/or substance use
- School changes and disruption in education

Schools can support students who are experiencing homelessness by:

- Ensuring service referrals address both immediate and long-term needs
- Providing the student with equal access to education
- Providing mentoring programs and crisis hotline information

#### **2SLGBTQIA+ Students**

Students who identify as Two-Spirit, lesbian, gay, bisexual, transgender, queer, questioning, intersex, asexual, plus (2SLGBTQIA+) are more likely to experience violence at school (Division of Adolescent and School Health, 2022). These dynamics put 2SLGBTQIA+ students at greater risk of recruitment by traffickers.

2SLGBTQIA+ students may be put at increased risk of trafficking due to the following:

- Exposure to cultural norms and belief systems that do not provide space for diverse expressions and identities
- Family rejection, which may lead to a struggle to obtain basic needs
- Harassment and/or discrimination from providers who have negative beliefs about 2SLGBTQIA+ individuals
- Emotional needs stemming from abuse and isolation

Schools can support 2SLGBTQIA+ students by:

- Creating a safe space for students to connect with positive supports and networks
- Using inclusive language and asking for student's pronouns in verbal conversation and on printed forms
- Knowing the difference between sexual orientation, gender identity, and gender expression and avoiding assumptions about students' identities, bodies, or behaviors

#### **Male Students**

Males are often overlooked as individuals who are experiencing trafficking or have increased risk factors for trafficking (National Human Trafficking Training and Technical Assistance

Center, n.d.). To date, most services and the language associated with human trafficking prevention and identification are female centric.

Male students may be put at increased risk of trafficking due to the following:

- Cultural norms that minimize the trafficking and abuse of teen and pre-teen boys and adult men
- Cultural norms and perceptions that make it difficult to identify males who have experienced trafficking
- Feelings of shame in asking for help
- Female-centric language in outreach and awareness-raising materials can impact how males recognize what they experience as trafficking

Schools can support male students by:

- Understanding that boys may have faced discrimination based on their race, gender, ethnicity, and sexual orientation from other supports, including the legal system, police, court, and hospitals
- Acknowledging there may be a reluctance to identify as a victim or survivor of violence
- Addressing students' fears of being blamed or not believed

#### Students Involved in Child Welfare

Students currently or previously involved with the child welfare system may have a history of abuse or neglect and struggle to identify healthy relationships. This may lead to increased susceptibility to manipulation by individuals who appear to offer love, support, assistance, and security.

Students involved in child welfare may be put at increased risk of trafficking due to the following:

- Exposure to family member's substance use disorder or domestic violence
- An inconsistent or missing caregiver
- Experiences of physical, emotional, or sexual abuse
- Lack of stability and multiple living situations (e.g., institutional living, residential programs, foster homes, group homes)

Schools can support students involved in child welfare by:

- Ensuring student access to in-school counseling and support services
- Engaging students in the decision-making steps related to support services
- Creating safe spaces for students to go to when needing to step out of the classroom

### Students Involved in the Juvenile Justice System

Justice-involved youth report high percentages of exposure to traumatic events, mental health challenges, and the risk factors associated with these life experiences (Dierkhising et al., 2013). Some students involved in the juvenile justice system may concurrently be part of the child welfare system.

Students involved in the juvenile justice system may be put at increased risk of trafficking due to the following:

- Struggles with new and/or repeated offenses, warrants, arrests, and probation
- Exposure to disciplinary threats related to detainment
- Delayed return to school based on system involvement
- Abuse (sexual, physical, and emotional) within the system or their system experience

Schools can support students involved in the juvenile justice system by:

- Increasing academic interventions and special education services for youth
- Assessing suspension and expulsion policies to ensure attendance in classes
- Ensuring clinical supports

## **Appendix B: HTSSP Development Timeline and Checklist**

Goal	Action	Timeline		
Prepare for a hun	nan trafficking school safety protocol (HTSSP)			
Gather information	<ol> <li>Take human trafficking training (e.g., SOAR trainings)</li> <li>Meet with community partners/experts</li> </ol>	Year 1: July	$\boxtimes$	
Encourage commitment	3. Gather buy-in from staff who will play a role in the HTSSP	Year 1: July	$\boxtimes$	
Plan the HTSSP				
Obtain approvals	Seek school board and/or superintendent approval	Year 1: July–August	$\times$	
Create team	<ol> <li>Identify developers and implementers</li> <li>Delineate roles/responsibilities</li> </ol>	Year 1: September– October	$\boxtimes$	
Choose structure	<ul><li>4. Review current school protocols</li><li>5. Determine if adapting or starting new</li></ul>	Year 1: October– November	$\times$	
Begin plan	Create a timeline     Determine guiding principles	Year 1: December– January	$\boxtimes$	
Build partnerships	<ul> <li>8. Determine partnership needs based on the student population</li> <li>9. Meet with community partners</li> <li>10. Assess knowledge and compatibility</li> <li>11. Explore the need for memoranda of understanding</li> </ul>	Ongoing	$\boxtimes$	
Develop the HTS				
Explore options	<ol> <li>Assess universal education vs. screening tool</li> <li>Identify a screening tool (if applicable)</li> <li>Determine the process for creating the HTSSP steps</li> <li>Explore the possibility of a safe space</li> </ol>	Year 1: February– March	$\boxtimes$	
Begin draft	<ul><li>5. Create the first draft</li><li>6. Ensure inclusivity</li><li>7. Incorporate services and supports</li></ul>	Year 1: March–May	$\boxtimes$	
Gather feedback	<ul> <li>8. Gather feedback from:</li> <li>a. School staff and administrators</li> <li>b. Students and families</li> <li>c. Community partners</li> <li>d. Lived experience experts</li> </ul>	Year 1: June–July	$\boxtimes$	
Build data plan	Decide what data will be tracked     Build a system for tracking data	Year 1: July–August	$\times$	
Finalize materials	<ul><li>11. Incorporate feedback</li><li>12. Develop data-tracking metrics</li><li>13. Submit all materials for school board approval</li></ul>	Year 1: July–August	$\boxtimes$	
Implement the H				
Train staff	<ol> <li>Create HTSSP training for staff</li> <li>Schedule a series of training dates</li> <li>Deliver training</li> </ol>	Year 2: September– November		
Roll Out	Implement the HTSSP	Year 2–Year 3: January–January		
Assess Outcomes	<ul><li>5. Survey the implementers</li><li>6. Pull data from the use of the HTSSP</li><li>7. Review data with team and community partners</li></ul>	Year 3: January– June		
Update and revis	Update and revise the HTSSP annually			
Update information	<ol> <li>Update the HTSSP based on feedback and data results</li> <li>Submit updates and revisions for approval</li> <li>Create training on the updated HTSSP and ensure all school staff with roles in the HTSSP are trained</li> </ol>	Year 3: June–August		

### **Appendix C: HTSSP Template**

### **Contents**

Include your table of contents

### **Introduction and Purpose**

Introduce the human trafficking school safety protocol (HTSSP) and describe its purpose. [Optional: Include learning objectives]

### **Key Definitions**

Provide key definitions. Include federal and state definitions of human trafficking and links to more information.

Human trafficking

Labor trafficking

Sex trafficking

Any additional definitions

# **Staff Roles and a Process for Addressing Student Disclosures and Reports From Staff and Students**

Describe the staff roles for addressing disclosures and reports from staff and students, including who is responsible and their specific tasks. Incorporate contact information through all steps of reporting.

#### **Staff Roles**

**Title:** Describe the staff role **Title:** Describe the staff role **Title:** Describe the staff role

#### **Staff Roles**

Who Is Responsible	Primary Responsibility	Potential Steps
All school personnel	Responding when concerned about a student or there are opportunities to support a student	<ul> <li>Observe for <u>risk factors</u>, human trafficking, exploitation, and other physical and emotional needs</li> <li>Refer the student to support programs or for assessment and/or intervention</li> <li>Elevate to administrators when aware of potential human trafficking recruitment on campus</li> <li>Utilize universal education or screening</li> </ul>
Designated staff (e.g., school counselors, social workers, school-based mental health professionals, district human trafficking prevention specialists, human trafficking coordinators)	Responding when human trafficking is indicated, identified, or disclosed	<ul> <li>Provide human trafficking education or education or screening</li> <li>Provide support to the student and other school personnel</li> <li>Assess for immediate needs and safety</li> </ul>
Staff receiving disclosure or designated staff	Reporting human trafficking through mandated reporting process	<ul> <li>Report human trafficking in accordance with state law and the HTSSP</li> <li>Provide coordination of the HTSSP and follow up if appropriate</li> </ul>

<sup>\*</sup>Note: a student disclosure of human trafficking is not required

# Human Trafficking Screening or Universal Education Information

Are you using a human trafficking screening tool? Describe the tool and purpose. [Optional: Provide links for further information and incorporate the screening tool in the document or appendix for reference]

Are you using universal education? Describe the process and purpose. [Optional: Provide links for further information]

Detail the process for student referrals to the screening tool or universal education.



# **Legal Obligations of a Mandated Reporter and the Process for Reporting Human Trafficking**

Provide detailed information about mandated reporting and the step-by-step process for reporting human trafficking. [Optional: Include visuals to assist school staff]

**Procedure** (\*Note: the order of these steps may differ based on state laws)

	Staff Who Suspect Trafficking Will:
Step 1	<ul> <li>Provide Student Support</li> <li>Provide emotional support to the student and tell the student the next steps</li> <li>Describe steps</li> <li>Escort student to [designated staff] for safety planning</li> <li>Describe steps</li> <li>[Designated staff] to complete [human trafficking screening or universal education, where applicable]</li> <li>Describe steps</li> <li>[Designated staff] to assess immediate needs and ensure follow up support</li> <li>Describe steps</li> <li>Add links to resources</li> </ul>
Step 2	Follow Mandated Reporter Requirements  • [Designed staff] will file a report through [CPS Reporting Contact Information]  • Describe steps  • [Designated staff] to complete follow up report (when applicable)  • Describe steps  • Add links to resources
Step 3	Notify School Administration  • [Designed staff] will notify [School Personnel] at [Contact phone or email]  • Describe steps  • Add links to resources
Step 4	Notify Authorities  • [Designed staff] will contact [law enforcement, state, or local task force] at [contact information] to coordinate response and assess campus impact  • Describe when to contact law enforcement or state and local task force and the steps  • Add links to resources
Step 5	Contact Parent/Guardian/Caregiver  • [Designed staff] will contact [parent, guardian, caregiver]  • Describe when appropriate and the steps  • Links to resources
Step 6	<ul> <li>Submit a Request for Assistance</li> <li>[Designed staff] will submit a request for assistance on behalf of foreign national minors through the Shepherd Case Management System         <ul> <li>Describe steps</li> </ul> </li> <li>Add links to resources</li> </ul>

### Responding to Persons Who May Have or Have Experienced **Human Trafficking and Other Forms of Violence**

Provide an overview of the importance of supporting persons who may have or do have lived experience of human trafficking and other forms of violence.

### **Protect and Maintain Student and Staff Confidentiality**

Describe the importance of and process for maintaining confidentiality.				
☐ Key component				
☐ Key component				
☐ Key component				
Provide Student Support				

Describe the importance of and process for supporting students.

- Immediate needs
  - Key component
  - Key component
  - Key component

### **Example: Student Safety Plan**

Feelings and Actions	Supports	Resources	
Situations that make me feel unsafe:	When I feel unsafe, I can contact: Home:	If I need additional support, I can contact:	
<ol> <li>Feeling pressured by my partner/parent/sibling/friend</li> <li>Lack of money or food</li> <li>Conflict in my household</li> </ol>	<ul><li>Person 1 Name Contact information</li><li>Person 2 Name Contact information</li></ul>	National Human Trafficking Hotline Call: 888-373-7888 Text: 233733	
	School: Person 1 Name Contact information Person 2 Name Contact information	National Domestic Violence Hotline Call: 800-799-7233 Text: START to 88788	
	Community: Person 1 Name Contact information	National Sexual Assault Hotline Call: 800-656-4673	
	<ul> <li>Person 2 Name Contact information</li> </ul>	Local/State/Regional Resources	
Things I can do to help me calm down and manage stress in the moment:	These are the people I can reach out to on my support team:	Activities that make me feel happy:	
<ol> <li>Take a walk</li> <li>Call a friend</li> <li>Meditate</li> </ol>	<ol> <li>CPS worker</li> <li>Guidance counselor</li> <li>Soccer coach</li> </ol>	<ol> <li>Going to art class</li> <li>Riding my horse</li> <li>Listening to music</li> </ol>	

- $\hfill \square$  Needs related to integration back into the school system
  - Key component
  - Key component
  - Key component

### **Example: Student Support Plan**

Support	Schedule	Goals	Point of Contact	Contact Information	Referral or Process
Immediate support needs					
Counseling	Tuesdays and Thursdays, 4–5 p.m.	<ul> <li>Help the student identify healthy relationships</li> </ul>	John Doe	123-456- 7890	Referral submitted and approved
Reintegration back into the school system					
Access to a safe space	Anytime by request of the student	<ul> <li>Help calm and re-center</li> <li>Gain access to counseling if needed</li> </ul>	Jane Doe	123-456- 7890	<ul> <li>The student will ask the teacher for space</li> <li>The teacher will notify the school counselor</li> <li>The counselor will meet with the student in a safe space</li> <li>The student will have 20 minutes of safespace time</li> </ul>
Student check-ins	Monday– Friday, 8:30 a.m.	Allow the student to receive extra support or resources	John Doe	123-456- 7890	<ul> <li>John Doe will check in with the student before the first bell every day</li> <li>John Doe will provide follow-up for any needs</li> </ul>
Ongoing support needs					
Mentorship program	Fridays, 2–3 p.m.	<ul> <li>Provide an opportunity for social engagement</li> </ul>	Jane Doe	123-456- 7890	Pending

### 

- Key component
- Key component
- Key component

### Follow-Up Services and Support

Provide an overview of the importance of culturally and linguistically appropriate and traumainformed services, identify community partners with links to additional information, and describe the referral process.

### **Services and Supports**

Organization	Focus	Website	Contact Information

### References

- Administration for Children and Families. (2017, November 21). Fact sheet: Human trafficking [Fact sheet]. U.S. Department of Health and Human Services.

  <a href="https://www.acf.hhs.gov/sites/default/files/documents/otip/fact\_sheet\_human\_trafficking\_fy18.pdf">https://www.acf.hhs.gov/sites/default/files/documents/otip/fact\_sheet\_human\_trafficking\_fy18.pdf</a>
- Dierkhising, C. B., Ko, S. J., Woods-Jaeger, B., Briggs, E. C., Lee, R., & Pyknons, R. S. (2013). Trauma histories among justice-involved youth: Findings from the National Child Traumatic Stress Network. *European Journal of Psychotraumatology*, *4*(1), <a href="https://doi.org/10.3402/ejpt.v4i0.20274">https://doi.org/10.3402/ejpt.v4i0.20274</a>
- Division of Adolescent and School Health. (May 31, 2022). *Creating safe schools for LGBTQ+ youth*. Centers for Disease Control and Prevention. <a href="https://www.cdc.gov/healthyyouth/safe-supportive-environments/PD-LGBTQ.htm">https://www.cdc.gov/healthyyouth/safe-supportive-environments/PD-LGBTQ.htm</a>
- Losen, D. J., & Martinez, P. (2020, October). Lost opportunities: How disparate school discipline continues to drive differences in the opportunity to learn. University of California, Los Angeles, Civil Rights Project.

  <a href="https://www.civilrightsproject.ucla.edu/research/k-12-education/school-discipline/lost-opportunities-how-disparate-school-discipline-continues-to-drive-differences-in-the-opportunity-to-learn/Lost-Opportunities-REPORT-v17.pdf">https://www.civilrightsproject.ucla.edu/research/k-12-education/school-discipline-continues-to-drive-differences-in-the-opportunity-to-learn/Lost-Opportunities-REPORT-v17.pdf</a>
- National Center on Safe Supportive Learning Environments. (2014). *Human trafficking in America's schools: Introduction*. U.S. Department of Education, Office of Safe and Healthy Students. <a href="https://safesupportivelearning.ed.gov/human-trafficking-americas-schools/introduction">https://safesupportivelearning.ed.gov/human-trafficking-americas-schools/introduction</a>
- National Human Trafficking Training and Technical Assistance Center. (n.d.). How to improve services for males experiencing human trafficking. U.S. Department of Health and Human Services, Administration for Children and Families, Office of Trafficking in Persons. <a href="https://nhttac.acf.hhs.gov/sites/default/files/2021-11/How%20to%20Improve%20Services%20for%20Males%20Experiencing%20Trafficking\_508\_Final\_2.pdf">https://nhttac.acf.hhs.gov/sites/default/files/2021-11/How%20to%20Improve%20Services%20for%20Males%20Experiencing%20Trafficking\_508\_Final\_2.pdf</a>
- Office of Safe and Supportive Schools. (2021, January). Human trafficking in America's schools: What schools can do to prevent, respond and help students recover from human trafficking (2nd ed). U.S. Department of Education.

  <a href="https://www2.ed.gov/documents/human-trafficking/human-trafficking-americas-schools.pdf">https://www2.ed.gov/documents/human-trafficking/human-trafficking-americas-schools.pdf</a>
- Sullivan, P. M., & Knutson, J. F. (2000, October). Maltreatment and disabilities: A population-based epidemiological study. *Child Abuse & Neglect*, *24*(10), 1,257–1,273. <a href="https://doi.org/10.1016/S0145-2134(00)00190-3">https://doi.org/10.1016/S0145-2134(00)00190-3</a>