[INSERT AGENCY NAME AND LOGO]

**HUMAN TRAFFICKING POLICY AND PROCEDURES TEMPLATE**

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| **Human Trafficking Response**  Title X grantees and subrecipient agencies are required to train staff on identification of potential victims of human trafficking and on notification, reporting, and appropriate intervention strategies. | |
| **Policy Title** | Human Trafficking Response |
| **Effective Date** |  |
| **Revision Dates** |  |
| **Review Due Date** |  |
| **References** | Title X Legislative Mandates  <https://opa.hhs.gov/grant-programs/title-x-service-grants/title-x-statutes-regulations-and-legislative-mandates> |
| **Approved by Signature** |  |
| **Approved Date** |  |

**Purpose:** The purpose of this policy is to describe ***(Insert Agency Name)***’s process for ensuring that grantee and subrecipient staff are in compliance with the requirement that staff   
are trained to appropriately identify, report, and refer victims and survivors of human trafficking.

**Policy:** *[The agency may want to include the following:]*

* Staff will be trained at least annually on:
  + Human trafficking identification and response
  + Mandatory reporting requirements
  + Confidentiality
  + Trauma-informed care
* Agency establishes knowledge of and/or maintains relationships with:
  + The National Human Trafficking Hotline
  + State child protective services
  + Local organizations that serve human trafficking victims; social service agencies; and human trafficking prevention coalitions
  + Law enforcement agencies, including relevant FBI task forces and police and/or sheriffs’ offices
* Staff may encounter victims and survivors of human trafficking throughout the clinic visit
* Family planning care and requested services will be provided as requested and needed, regardless of a client’s willingness to report human trafficking or other violence
* Agency incorporates the expertise and experience of survivors when shaping protocols
* Procedures for responding to human trafficking should:
  + Use gender- and age-neutral language
  + Use non-judgmental, non-blaming language to describe trafficking
  + Refer to site protocols regarding other forms of violence and response
  + Use existing anti-trafficking resources from the [National Human Trafficking Hotline](https://humantraffickinghotline.org/) or the [National Human Trafficking Training and Technical Assistance Center](https://www.acf.hhs.gov/otip/training/nhttac) (NHTTAC)
* Agency distributes and posts violence education and prevention materials in languages accessible to the client population. These materials can include human trafficking education and information on resources available to a client who may not be ready or able to disclose victimization or accept assistance. All client materials must be reviewed by the Information and Education (I&E) Committee per I&E policies.
* Identify key personnel to be involved if human trafficking is suspected, based on site capacity.
  + Some sites may have specialized staff who can conduct more intensive interviews or assessments related to sexual assault, human trafficking, or other forms of violence. Sites with more limited expertise in this area can focus on referrals.
* Consider safety concerns (for client and staff) that may be a part of assisting a victim of trafficking. Consider other organizational policies related to when to call security or law enforcement.

**Procedure:** *[The agency may want to include the following:]*

* Clinicians and staff agree upon a statement of shared commitment to human trafficking response. The agency posts this agreement for public view. For example:

“***(Insert Agency Name)*** is committed to responding to the unique needs of human trafficking victims and survivors. It is our policy to support those who have been trafficked with a victim-centered and trauma-informed approach.”

* Integrate human trafficking identification and response into existing staff workflows
  + Intake:
    - Apply a client-centered approach
    - Consider signs and indicators of human trafficking (refer to “Identifying and Referring Human Trafficking Victims and Survivors: Red Flags for Title X Clinicians” or National Human Trafficking Hotline materials)
    - Maintain and enforce clinic policy that patients spend time alone with their clinician during the assessment
  + If signs and indicators are present during intake or clinical assessment, take three steps:

1. Notice red flags
2. Establish trust and safety
3. Take action

**Step 1: Notice red flags**

* Refer to “Identifying and Referring Human Trafficking Victims and Survivors: Red Flags for Title X Clinicians”

**Step 2: Establish trust and safety**

* Build trust by demonstrating warmth, care, and non-judgemental interest and concern
* Ensure client has time alone with providers and access to language interpretation
* Leverage your expertise to carry out patient-centered screening for violence, including intimate partner violence, trafficking, and sexual or physical violence
* Refer to existing institutional protocols for victims of violence
  + Remember: while human trafficking is a distinct federal crime, victims may experience trafficking as intimate partner violence, sexual assault, or child sexual abuse
* Be aware of incremental disclosure issues in human trafficking, similar to those in intimate partner violence or other abuse experiences
* *It is important to obtain client permission and consent before disclosing any personal information to others, including service providers.*

**Step 3: Take action**

* Follow your institutional policies for reporting to law enforcement in situations of immediate danger
* Consult agency protocols for human trafficking and mandatory reporting
* Call the National Human Trafficking Hotline at 1-888-373-7888 or text BEFREE (233733) for additional support and referrals
  + The National Human Trafficking Hotline can support clinicians and staff through patient assessment and shared decision-making with the patient about best next steps
  + Call local anti-trafficking organizations **(*insert names and contact info here*)**
  + If it becomes necessary to file a mandatory report, follow best practices for involving and empowering clients
* Follow up on the client’s case. A potential victim may require fulfillment of some basic needs—such as food, clothing, or temporary shelter—in order to take next steps, and may not be ready to accept help right away.

***Note About The National Human Trafficking Hotline***

The National Human Trafficking Hotline offers confidential, round-the-clock access to a safe space to report tips, seek services, and ask for help. The Hotline is operated 24/7 and has access to more than 200 languages through a tele-interpreting service.

All communications with the National Human Trafficking Hotline are strictly confidential to the extent permitted by law, and callers need not disclose personal information to access services. The Hotline can also be used by health care institutions to help identify and connect clients with existing resources in their area or to guide providers through human trafficking assessments.

The National Human Trafficking Hotline maintains a database of service providers and resources throughout the United States; this database is available [here](https://humantraffickinghotline.org/training-resources/referral-directory).

Contacting the Hotline will not fulfill mandatory reporting requirements, but it can facilitate   
a report to specialized law enforcement trained to handle human trafficking cases. When   
working with adults who have been trafficked, Title X providers must follow state and federal confidentiality and mandatory reporting rules.