

Kent County Human Trafficking School Safety Protocol



The **Kent County Human Trafficking School Safety Protocol** was created as a part of the Human Trafficking Youth Prevention Education Demonstration Program through the Office on Trafficking in Persons (OTIP). This project is supported by the Administration for Children and Families (ACF) of the United States (U.S.) Department of Health and Human Services (HHS) as part of a financial assistance award totaling \$500,000 with 100 percent funded by ACF/HHS. The contents are those of the author(s) and do not necessarily represent the official views of, nor an endorsement, by ACF/HHS, or the U.S. Government. For more information, please visit the ACF website, Administrative and National Policy Requirements.



Introduction and Learning Objectives

This Human Trafficking School Safety Protocol (HTSSP) was created by Kent ISD, in collaboration with community partners and local district staff. It is part of a comprehensive effort to *recognize, respond, and report* in order to prevent and intervene in incidences of suspected or confirmed cases of human trafficking. This protocol is used in combination with training provided by 3Strands Global Foundation's PROTECT program—a researched based comprehensive curriculum which provides training for school employees and prevention education curriculum for students. This HTSSP will provide you with the tools to:

- Define the severe forms of trafficking in persons and how a student can be exploited;
- Recognize the life experiences that can make a student more susceptible to being trafficked and potential indicators to look for;
- Create a trauma-informed system that meets the immediate physical and psychological needs of possible and identified victims engaging with our school systems;
- Understand your role as you report suspected or confirmed cases of child trafficking and the necessary steps to follow; and
- Utilize local and national support services for students.



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Recognizing Child Trafficking

Trafficking Victims Protection Act (TVPA)

Within the United States, the Trafficking Victims Protection Act of 2000, as amended, provides tools to combat human trafficking both worldwide and domestically.^[1]

The TVPA defines severe forms of human trafficking as:

A crime that involves exploiting a person for labor, services, or commercial sex. For an adult the use of force, fraud, or coercion must be present. The use of force, fraud, or coercion must also be present for child labor trafficking.

- Examples of force: The use of physical restraint, physical harm, sexual assault, and/or beatings.
- Examples of fraud: false promises made about things like employment, wages, working conditions, love, marriage, or a better life.
- Examples of coercion: The use of threats of serious harm to or physical restraint against any person, psychological manipulation, document confiscation, as well as shame and fear-inducing threats to share information or pictures with others or to report to authorities.^[2]

Definition of Sex Trafficking

Sex Trafficking: the recruitment, harboring, transportation, provision, obtaining, patronizing, or soliciting of a person for the purposes 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 an act has not attained 18 years of age. (22 U.S.C. § 72)^[3]

MINOR VICTIM: UNDER THE AGE OF 18

When involving a minor (under the age of 18), the presence of force, fraud, or coercion is NOT required to be considered a victim of sex trafficking.

No matter the scenario, the law and its subsequent reauthorizations made clear that children under age 18 should **never** be treated as willing accomplices in prostitution, pornography schemes, or any other act involving the commercial sale of sex. (22 U.S.C. § 7102).

Sex Trafficking example: Romantic Partner

“My partner owed someone a lot of money. They begged me to sleep with their friend and said it would clear their debt. They promised it would only happen once.”

[1] U.S. Dept. of State (2019). Office to Monitor and Combat Trafficking in Persons, International and Domestic Law. Retrieved <https://www.state.gov/international-and-domestic-law/#laws>

[2] Office on Trafficking in Persons (2000). Fact Sheet: Human Trafficking. U.S. Department of Health and Human Services. Retrieved <https://www.acf.hhs.gov/otip/fact-sheet/resource/fshumantrafficking>

[3] United States Department of Justice (2000). Key Legislation. The Trafficking Victims Protection Act or 2000. Justice for Victims of Trafficking Act of 2015. Retrieved <https://www.justice.gov/humantrafficking/key-legislation>

Definition of Labor Trafficking

The recruitment, harboring, transportation, provision, or obtaining of a person for labor or services, through the use of force, fraud, or coercion to subject a person to involuntary servitude, peonage, debt bondage, or slavery.^[1]

Labor Trafficking example: Employer

"I'm working at a Greenhouse all weekend and afterschool each day because if I don't, they'll hurt my family in Honduras, and I have to pay back my travel costs to get to the US."

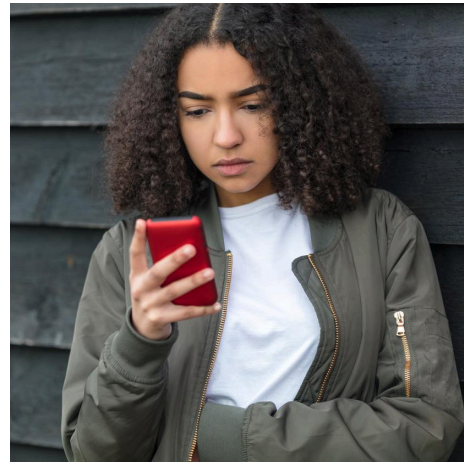
At-Risk Populations

Although no one is immune to potential exploitation, certain circumstances or life experiences may increase vulnerabilities and, as a result, increase the risk of exploitation. All individuals have needs in order to survive and thrive. This includes basic needs, physiological (food and clothing), safety (physical, emotional, financial), love and belonging, esteem, and self-actualization. When these needs are unmet, it can lead to a person being vulnerable.

Students, simply because they are young people, are vulnerable to trafficking. They are growing and working to develop socially, emotionally, and physically. But some groups of young people are particularly vulnerable because of multiple risk factors. Vulnerable groups tend to include those experiencing poverty, family instability, physical and sexual abuse, and lack of access to resources. Trauma as well as racism, discrimination, and historical trauma, also play a significant role in increasing a young person's vulnerability to experiencing trafficking. Because racial and ethnic minorities are more likely to experience these risk factors, they are more vulnerable to child trafficking.

As you consider students that may be at-risk for experiencing human trafficking, it is important to recognize that these can be both individual and systemic gaps that make students more vulnerable.

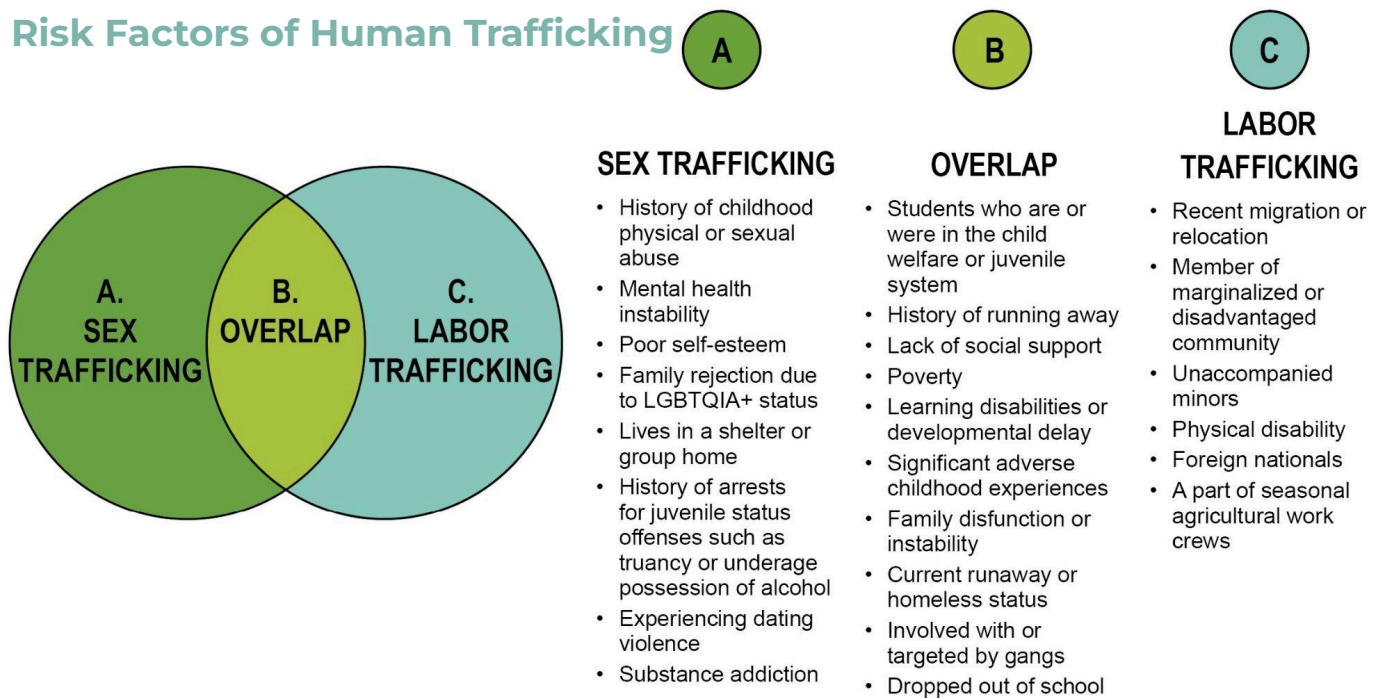
This graphic offer risk factors that may be specific to sex trafficking and labor trafficking, along with intersections of both:^[2]



^[4] Cornell Law School. Legal Information Institute. (2021) Retrieved <https://www.law.cornell.edu/uscode/text/22/7102>

^[5] U.S. Department of Education, Office of Safe and Supportive Schools. (2021). *Human trafficking in America's schools: What schools can do to prevent, respond, and help students to recover from human trafficking* (2nd ed.). U.S. Department of Education.

Risk Factors of Human Trafficking



Red Flag/Indicators

A teacher or school employee is in a great position to identify signs and risk factors associated with human trafficking because of two key things: context and proximity. The interactions a school employee may have with a student is important because of the proximity to the student and the potential longevity of the interaction over a period of days, weeks or even years. A school employee can *observe with a purpose* and ask key questions when they notice a risk factor in a student or when something doesn't seem right. The school employee can gain understanding around the context of the student's situation, and, through relationship, can learn their story.

It is important to observe with a purpose. There are many opportunities throughout the day to notice red flags and beyond. It is not just about knowing the signs; it's knowing the child's story^[1]. Once you notice one red flag, you can talk more with the student or follow up with other school services.

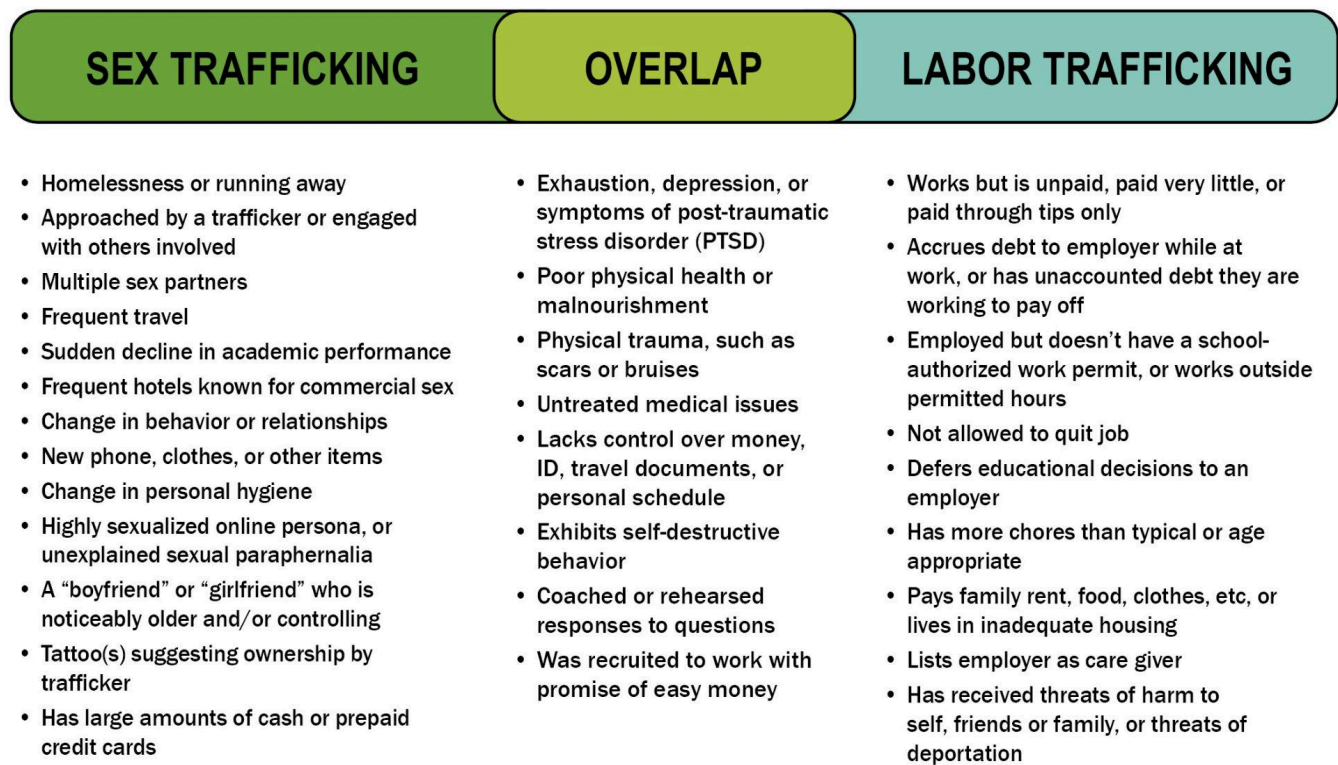
Red flags to listen for:

- Subtle mention of a dysfunctional home life.
- Evidence of food or home insecurity.
- References to sexual situations, especially use of terms beyond age-specific norms.
- Seemingly rehearsed responses to questions.
- Excuses for a family member's, boyfriend's, or girlfriend's potentially abusive behavior.
- Suspicious-sounding details about work (e.g., student works excessively long hours, someone else controls student's money).

[6] Polaris Project, (2021). It's Not Knowing the Signs – It's Knowing the Story. Retrieved <https://polarisproject.org/recognizing-human-trafficking/>

The graphic below identifies red flags and indicators that may be present in sex and labor trafficking. While the indicators are not identical, some red flags are present for both.

While these indicators are common in both sex and labor trafficking situations, it is important to note that some students may not show any of these signs and still be experiencing trafficking. Additionally, students who are being trafficked may also not readily disclose the reality of their situation. Education and awareness of school personnel is paramount to being able to identify students and get them to the appropriate support for healing.



Responding to Child Trafficking

Trauma-Informed/Person-Centered Care

Trauma-informed care is a framework for offering services and is based on principles considered central to understanding the specialized needs of trauma survivors. It is strengths-based, includes an understanding about the impact of trauma on survivors, emphasizes safety, and works to rebuild an individual's sense of control and empowerment. These features are particularly important for exploited students/youth.

Key Principles of a Trauma-Informed Approach

- **Safety:** Students must feel physically and psychologically safe. The physical setting is safe and interpersonal interactions promote a sense of safety. Understanding safety as defined by those served is a high priority.
- **Trustworthiness and Transparency:** Building trust and transparency is a core component of a trauma-informed approach. This could be done through a variety of ways. For example, if a student were to begin disclosing information about abuse, neglect, or human trafficking, as a mandated reporter it would help to be transparent and build trust through saying, "Thank you so much for opening up to me about this. I'm here as part of your support team and appreciate that you trust me. One of the things I want to remind you of is that I am a mandated reporter so I'm going to have to tell someone what you are going to share with me and when I do that, you will have to retell your story." This gives them the choice to move forward, or not, as they feel comfortable and work to avoid re-traumatization.
- **Peer Support:** This is integral and serves as a key vehicle for building trust, establishing safety, and empowerment.
- **Collaboration and Mutuality:** There is a meaningful sharing of power and decision-making, when appropriate, and a recognition that healing happens.
- **Empowerment, Voice and Choice:** There is acknowledgement that every person's experience is unique and requires an individualized approach.
- **Cultural, Historical, and Gender Issues:** As a school community, we must move past cultural stereotypes and biases, offer culturally responsive services, leverage the healing value of traditional cultural connections, and recognize historical trauma.

Culturally and Linguistically Responsive Approaches

Every person approaches others and situations through their own unique cultural lens, which can produce stereotypes and cultural bias. This can impact a person's ability to recognize risk factors of a trafficking victim. ^[1]

^[7] Bryant-Davis, T., & Tummala-Narra, P., (2016). Cultural Oppression and Human Trafficking: Exploring the Role of Racism and Ethnic Bias. *Women & Therapy*. 40:1-2, 152-169, DOI: 10.1080/02703149.2016.1210964

“Cultural competence refers to an ability to learn from and respectfully relate to other cultural backgrounds, heritages, and traditions. It comes from acknowledging and understanding one’s own culture and values while respecting those of others.” ^[1]

As each person utilizes the protocol, their own cultural framework is at play and it is important to be aware of this influence on one’s response. A response which respects a diverse student body representative of many cultures and backgrounds is key to reducing bias and outcomes that create health and wellness disparities tied to race and ethnicity.

The U.S. Department of Health and Human Services provides national standards for culturally and linguistically responsive services to “provide effective, equitable, understandable, and respectful quality care and services that are responsive to diverse cultural health beliefs and practices, preferred languages, health literacy, and other communication needs.”

Here are a few initial steps to ensuring cultural and linguistic competency when responding to child trafficking:

- Offer language assistance to individuals who have limited English proficiency and/or other communication needs.
- Partner with community organizations of diverse cultural and ethnic backgrounds.
- Model appreciation and respect for diverse cultures and backgrounds.

These intentional steps contribute to ‘building blocks of resilience’ which acknowledges that a culturally appropriate response by a caring adult can help a student overcome the possible abuse or exploitation and would be protective factors that may mitigate the adversity.^[2]

Protective Factors

As we identify the challenging life experiences that students may be faced with, it is paramount to also identify what protective factor(s) could help to change the trajectory of their lives in a positive way.^[1]

A protective factor is a characteristic at the biological, psychological, family, or community (including peers and culture) level that reduces the negative impact of a risk factor, ultimately reducing the student’s vulnerability to problem outcomes.

An example of a protective and risk factor relationship could include:

- A student that has anxiety and low self-esteem as the risk factor and positive peer relationships are the protective factor.
- A student who is emotionally abused at home and struggles to make friends; the protective factor would be a teacher who encourages the student’s writing and supports their talent.

[8] The IRIS Center (2021). What influence does Culture Have on a Students Success? . Peabody Challenge, Vanderbilt University. Retrieved <https://iris.peabody.vanderbilt.edu/module/clde/cresource/a1/p02/>

[9] Hughes K, Ford K, Davies A, Homolova L and Bellis MA (2018) Sources of resilience and their moderating relationships with harms from adverse childhood experience Report 1: Mental Bateson et al. 13 Illness. Public Health Wales.

[10] The Institute on Trauma and Trauma Informed Care (2015) <http://socialwork.buffalo.edu/social-research/institutes-centers/institute-on-trauma-and-trauma-informed-care/what-is-trauma-informed-care.html>

No matter what your role, there are simple steps that you can take to create a trauma-informed space for students. These include:

Create a Brave Space

A brave environment is one in which everyone is treated with respect. In brave environments, all students, including those identifying with groups that are often marginalized, feel they have a voice.

Here are some suggestions:

- Develop predictable routines and practices.
- Be honest and share developmentally appropriate information.
- Give the student space and respect personal boundaries.
- Honor students' experiences, viewpoints, and identities.
- Avoid shaming students with incorrect answers or missing homework.
- Give students voice, power, and control wherever appropriate.
- Never let bullying go unaddressed.
- Take time to explicitly teach students respectful social skills.
- Design a classroom space that displays commitment to kindness, diversity, and community.
- Be curious about behavior that seems disruptive. Think about the underlying cause.

Having a Conversation

Taking the time to have a conversation with a student can make the difference between them getting help or continuing in a bad situation. Look for opportunities to reach out, let them know you are available and care, and take the time to listen. When you have a conversation use trauma-informed care. Children with trauma often blame themselves for harm that has been done to them and believe that they are a “bad kid.” As such, blaming or judgmental words can be quite damaging.

Here are some suggestions:

- Maintain a nonjudgmental stance.
- Be attentive to body language.
- Use open-ended questions.
- Show you are listening by paraphrasing to the student what you think they are saying.
- In all interactions, be respectful and compassionate.
- Remember that building trust is an ongoing process that happens one positive interaction at a time.



Consider these prompts when working to engage a student in conversation using a trauma-informed approach:

- I'm concerned because you seem tired/sad/angry/ ____ lately.
- How are you doing?
- I want to help you succeed/be safe/talk to someone who can help.
- What happened?
- It sounds like you are feeling ____.

- Let me see if I understand what you're saying . . .
- Tell me more about that.
- What do you need?
- What to say if a child discloses that they have been exploited:
 - Thank them for trusting you.
 - Tell them that you are going to help them.
 - Tell them who else you will need to share information with (e.g., the school counselor or social worker, Child Protective Services- mandated report).
- Check for safety: ask about immediate needs and any immediate danger.

Student-Level Barriers

It is important to recognize that there are barriers that may make a student reluctant to share about their exploitation. Listed are some potential considerations. *Please note that this is not an exhaustive list.*

- Lacks awareness of victimization
- Lacks understanding of victim and legal rights
- Lacks identification and other records
- Has a language barrier
- Fears consequences of engagement with law enforcement (e.g., deportation, arrest) for themselves or others (e.g., family member, trafficker)
- Fears that reporting could lead to child welfare involvement (e.g., being removed from home, returned to an abusive home, or placed in foster care)
- Feels complicit in illegal activity
- Fears that traffickers will cause harm to self, family, or loved ones
- Has limited literacy and education that hinders the ability to communicate
- Has experienced trauma bonding with the trafficker or other victims
- Distrusts service providers or those in authority
- Feels hopeless and helpless
- Feels shame and guilt

Steps to Increase Wellness

Increasing wellness practices can be good for students and adults. It's important to use trauma-informed strategies and consider the needs and barriers to wellness that exist for each student.

Here are some suggestions:

- Model self-regulation techniques, such as deep breathing, meditation, and exercise.
- Use a strength-based approach to build resilience and counteract shame.
- Give students resources for stress-reduction (apps, websites, or handouts).
- Some mindfulness activities, such as closing their eyes, might make some students feel unsafe.
- Invite a wellness speaker to engage with the student.
- Create connections to resources within the school and with community organizations.
- Encourage the student to reach out to the guidance counselor, especially students showing red flags.
- Look for ways to give the student control and have opportunities for success.
- Share stories of yourself or others making positive wellness decisions.
- Develop ways to increase research based developmental assets for students, taking into consideration protective factors of opportunity, support, and relationships.

Reporting Child Trafficking

Safe Harbor Laws

Safe Harbor Laws were developed by states to address inconsistencies in the way that victims of human trafficking are treated [under the law](#). Specifically the [Michigan Safe Harbor Law](#) allows for a victim-centered approach which shields both minor and adult victims of sex trafficking from criminal liability from the prostitution related crimes that occurred as a result of their trafficking experience. Victims of minor sex trafficking under 16 are fully protected from prostitution charges and presumes a minor found in prostitution is a trafficking victim.

Under federal law, all minors under the age of 18 are considered victims of human trafficking regardless of force, fraud, or coercion.

Mandated Reporter Legal Obligations

[Michigan Child Protection Law](#) requires certain professionals to report their suspicions of child abuse or neglect to Centralized Intake (CI) at the Department of Health and Human Services (DHHS). School personnel (including administrators, teachers, and support staff) are mandated reporters based on their professions. Any school personnel who suspect trafficking of a child is required by law to report. District employee should make a report to CPS, in accordance with school policy and [Michigan Child Protection Law](#). Reports can be made by calling 855-444-3911 and completing the [3200 form](#). Additionally, reports can be made through the online Michigan Reporting systems (MORS) Details on this process can be found [here](#).

Each district should refer to their **school board approved policies** for district specific protocol on reporting.

Confidentiality

Confidentiality is a key component to protect students and staff in record keeping. Follow the Action Steps below for direction on when and who to report confidential or personally identifying information to. Reference your individual District confidentiality policy.

District Trafficking Liaison and Student Support Team

Identifying a District Trafficking Liaison and Student Support Team within each school building is imperative to meeting the students' immediate and ongoing needs. The District Trafficking Liaison will be part of a Student Support Team which will work collaboratively to ensure the best possible outcomes for students and families.

District Trafficking Liaison

The District Trafficking Liaison is to be identified at the beginning of each school year by administration and HTYPE district team members who take part in the HTYPE Professional Learning Community. The name(s) and contact information are listed in this [document](#), and should be updated during the school year if necessary to reflect staffing changes. The District Trafficking Liaison serves as a local expert and point person for additional information from human trafficking experts in the community. At minimum, each district should review the identified liaison at the beginning of each school year.

Student Support Team

The Student Support Team will work collaboratively to meet the needs of any student who has been identified as an at-risk, potential, or confirmed case of human trafficking. This team may be a regularly assembled team (i.e. Student Success Team, Child Study Team, etc.), but should include the following school personnel: District Trafficking Liaison, school administrator, counselor, social worker, other school staff. Additional school staff members may be added on a case-by-case basis, depending on the individual needs of the student. For example, if the student who is at risk or shows evidence of being trafficked has built rapport with a specific teacher who is not a member of the [Student Support Team](#), that teacher should still be added to the Student Support Team for that specific student.

The District Trafficking Liaison will work with school administration to determine the specific staff to include in the Student Support Team for a particular student. [HTYPE team](#) members are available to assist through coaching and/or consultation. The Student Support Team for specific cases should be made up of staff on the [Student Support Team list](#) and any additional school staff team members needed to fill the roles below.

Consider the following qualifications for the Student Support Team:

1. A staff person who has rapport with the student
2. A staff person trained in the PROTECT trafficking curriculum for staff
3. An administrator, counselor, or social worker
4. A staff person who attends monthly PLC with HTYPE grant coordinator and community leaders.

NOTE: Individual school staff on the team can meet more than one of the above qualifications. For example, if the staff who has rapport with the student is also trained in the trafficking curriculum, they fulfill qualifications of both 1 and 2.

Procedures

The following procedures guide school staff and the school support team to respond to concerns of at-risk, potential, or confirmed cases of human trafficking that may be identified in the school environment.

It is important to note if a child is in immediate or imminent danger at any time, call 911.

Continuum of Concern Tool

The [Continuum of Concern Tool](#) is for use by any member of the school staff who has had a conversation with a student or has observed possible indicators that a student is at risk for being trafficked, is suspected of being trafficked or is experiencing human trafficking; labor and/or sex trafficking. The tool is to be utilized by the school staff member to gauge the level of concern based on the indicators the staff person has heard or observed. The continuum markers - **No Concern, Possible concern, Clear Concern, No Info** - are meant to assist in the determination of what specific action steps need to be taken. It can also assist in discussing the student's specific risk factors when reporting (refer to decision map tool and action step procedure below).

If the staff person determines that there is a **possible concern or clear concern**, the staff person will follow the step-by-step process outlined in the **Decision Map Tool and Action Step Procedures** listed below.

CONTINUUM OF CONCERN TOOL				
POSSIBLE RISK FACTORS	No concern	Possible Concern	Clear Concern	No Info
SIGNS OF CURRENT ABUSE OR TRAUMA				
Physical or behavioral indications, ex: cutting, withdrawal, sudden truancy, rapid decline in grades				
HISTORY OF ABUSE & TRAUMA				
Consider past physical, sexual, emotional abuse and neglect indicators				
HOUSING INSTABILITY				
Experiencing homelessness, "couch surfing," living in workplace or being displaced				
SOCIAL ISOLATION				
Someone controlling social interaction and relationships ex: the student starts spending time with others who could be negatively influencing them. Student is picked up by an older person from school and spends less time with peers. Student is secretive about where they are going and who they are with.				
NOTABLE CHANGES IN WELLNESS/HEALTH				
Physical Wellness: Malnourishment, signs of neglect, bruising, Examples: changes to behavior which could include falling asleep in class, unable to concentrate, physically unable to keep up with peers, often wearing long sleeves or pants when warm out, or a decline in hygiene, EX: Exploited in the farm agriculture industry: smell of sweat, too much sun exposure, dirty/soiled fingernails. Exploited in cantinas: food smell. Exploited in spas: strong smell of perfume, lotion, beauty products, oil scent, or an unexplained fake skin tan.				
Mental Health: Suicidal ideation, homicidal ideation, self-harm, cutting, changes in mood such as depression, anxiety, anger or elation/ elevated mood or other related mental health concerns. If there are concerns about suicidal ideation follow your district's suicide ideation protocol.				
Behavioral Health: The student has a sudden increase in money, clothing, prepaid cell phone(s) or jewelry and has no explanation on how they got these things. Has multiple hotel keys or key cards.				

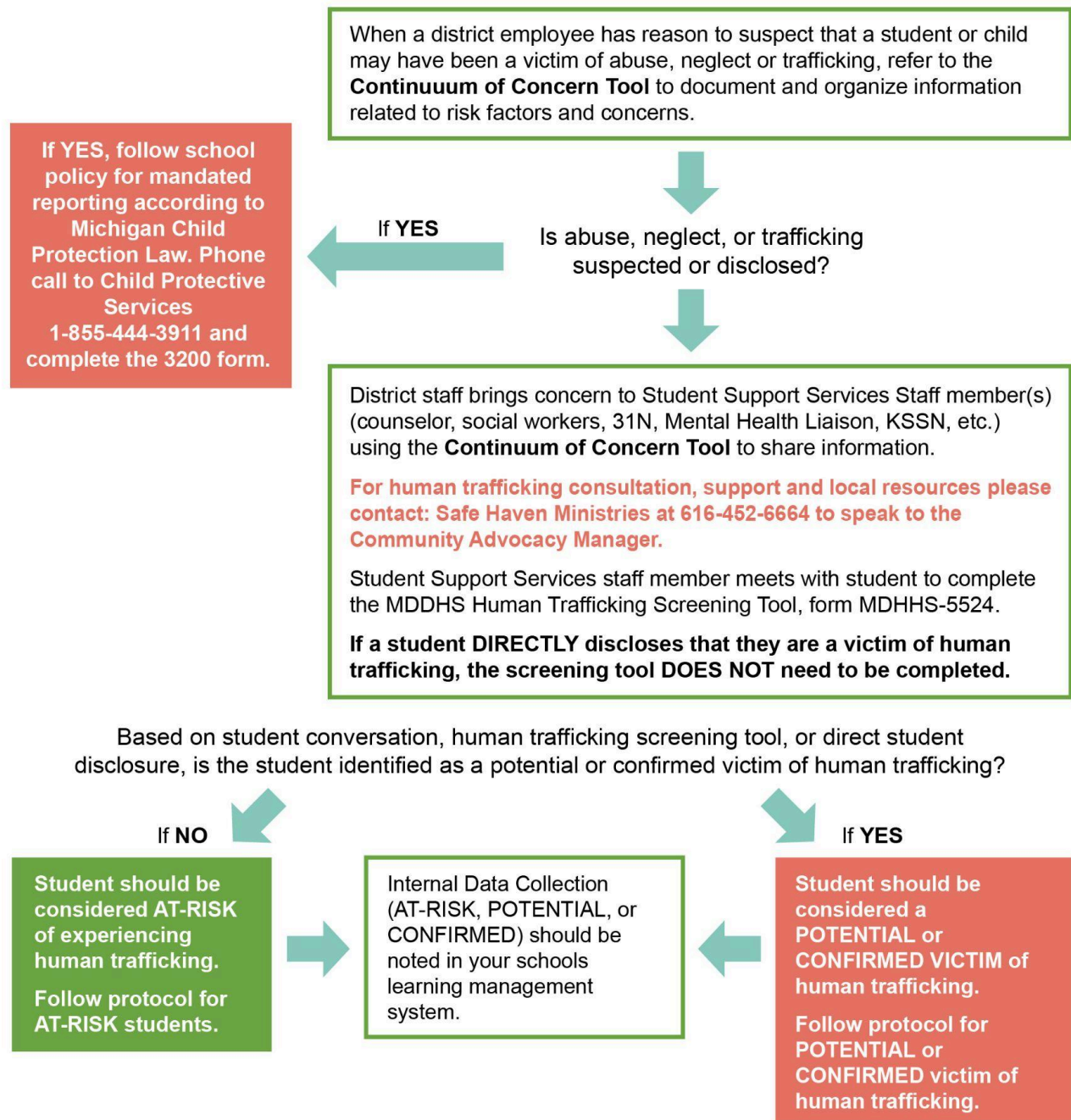
RISKY ACTIVITY				
Involvement in the Juvenile Justice system (ex: probation, detention, diversion program), gang affiliation, drug abuse.				
CONTROLLED BY ANOTHER PERSON				
Immigration paperwork taken; Personal ID controlled. The person dropping off or picking up the student is not an appropriate person to do so. The student is forced to distribute or sell drugs.				
WAGE/ LABOR ABUSE				
Violating work permit guidelines, wages withheld, debt incurred.				
THREATS TO SAFETY				
Threats against the student, the family, or friends or actual violence against the student, family, or friends. If there are concerns about threats to safety - follow school policy on mandated reporting in accordance with Michigan state law.				
ACADEMIC				
Sudden change in academic performance, changes in attendance patterns (truancy), missing school or class to be at work (student reports no flexibility in work hours), misses school or class due to exhaustion.				

[11] Solutions to End Exploitation, (2021). Continuum of Concern for Human Trafficking Tool.

Decision Map Tool

Using the information gathered from the [Continuum of Concern Tool](#), school staff members can utilize the Decision Map Tool to best determine the course of action and guide school staff to the next appropriate step:

Protocol for Reporting At-Risk, Suspected, or Confirmed Cases of Child Trafficking (Or other incidents of abuse, neglect, or other forms of violence)



Action Steps

If a student is considered a **POTENTIAL** or **CONFIRMED** victim of human trafficking, follow the action steps below:

<p>Step 1</p> <p>Determination</p>	<p>The staff member who observed/suspects or the student directly disclosed to has made the determination that the student is a potential or confirmed victim of human trafficking.</p> <p>Student Support Services staff (counselor, social worker, 31N, KSSN, etc) complete the form MDHHS 5524.</p> <p>In the case of direct student disclosure do not complete MDHHS 5524</p> <p>Familial involvement determination:</p> <p>If a student discloses familial involvement in the trafficking situation or if it is assessed there may be familial involvement it is important to disclose this to CPS during the intake call report or in the online report made to CPS.</p> <p>For human trafficking consultation, support and local resources please contact: Safe Haven Ministries at 616-452-6664 to speak to the Community Advocacy Manager.</p>
<p>Step 2</p> <p>CPS Reporting</p>	<p>The original staff member who observed/suspects/student disclosed must be the person to REPORT that a student is a potential or confirmed victim of human trafficking, and are REQUIRED to make a report to CPS, in accordance with Michigan Child Protection Law.</p> <p><i>It is important to note that reporting to a principal, supervisor, school nurse, school counselor, social worker, psychologist, or other District official does not satisfy an employee's duty to report to Child Protective Services.</i></p> <p>Once a CPS report has been made by school staff regarding possible or confirmed human trafficking instances, the Kent County Rapid Response Team will be notified and deployed for care coordination and advocacy. A member of this team will follow-up with the District Trafficking Liaison.</p> <p>2 WAYS TO REPORT:</p> <ol style="list-style-type: none">1. Reports can be made by calling 855-444-3911 and completing the 3200 form.2. Reports can be made through the online system MORS. <p>Details on this process can be found here.</p> <p>LANGUAGE TO USE WHEN MAKING A CPS REPORT:</p> <p>When there is a potential or confirmed trafficking situation, it is important to use the words "human trafficking" while talking to CPS Central Intake Operator or directly in the online report.</p> <p><i>*If specific concerns about parental involvement in human trafficking or neglect is suspected, state that here.</i></p> <p>The District Employee is encouraged to state:</p> <p>"I believe this student or child may be (or is) a victim of human trafficking for the following reasons..." And <i>(if applicable, see Step 1)</i> "I suspect familial involvement" and describe the details of why.</p> <p><i>*If a previous report was made by the school staff who brought the concern, reference the intake ID number of that report*</i></p>

<p>Step 3 Follow-Up Notification</p>	<p>The staff member who filed the CPS report must then notify the CPS Human Trafficking Coordinator, Denise Potter, via email of the CPS report made. Please use the email: potterd@michigan.gov.</p> <p>Reporters should provide the following information in the email to ensure appropriate follow-up and classification as a Human Trafficking concern:</p> <ul style="list-style-type: none"> • Intake Identification Number • Student Name (First/Last) • Student DOB
<p>Step 4 Administrative Reporting</p>	<p>The staff member that filed the CPS report must then notify the identified District Trafficking Liaison who is also part of the Student Support Team.</p> <p>Notify via conversation or other form of communication, (follow school guidelines). Include details of the potential or confirmed human trafficking specific situation and of the report made to CPS.</p> <p>The District Trafficking Liaison (unique to each school, listed here), school administrator or staff on the Student Support Team will report the case details within 24 to 48 hours to ensure adequate follow up for the student to receive the best care possible:</p> <p style="text-align: center;">Contact: Chris Becker, Kent County Prosecuting Attorney chris.becker@kentcountymi.gov</p> <p>[The Kent County Prosecutor’s office will follow up with appropriate law enforcement and collaborate with Denise Potter at CPS to work towards the most successful outcome possible]</p> <p>For additional resources or support contact the National Human Trafficking Hotline: National Human Trafficking Hotline (24/7) 1-888-373-7888 or Text 233733 (Text “HELP” or “INFO”)</p> <p style="text-align: center;">NOTE:</p> <p style="text-align: center;">Investigative Determination/Law Enforcement Engagement</p> <p style="text-align: center;">If CPS and local law enforcement determine the need for an investigation, they will contact the Child Advocacy Center of West Michigan to host the interviewing whenever possible.</p>
<p>Step 5 Assess School Safety Impact</p>	<p>Assess school safety impact: Safety for the student who is a potential victim and for other students.</p> <p>CPS and assigned Law Enforcement will make the determination to investigate possible impacts on school campuses, including harassment and/or recruitment, threats to school safety, etc.</p> <p>If school safety threats are determined, follow specific school policy in collaboration with information from local law enforcement agency.</p>

<p>Step 6 Parent/Guardian Notification</p>	<p>In cases of CPS mandated reporting, principals or other school district employees shall not contact the parents, relatives, friends, neighbors, etc. for the purpose of determining the cause of the injury and/or apparent neglect.</p> <p>WHEN TO CONTACT THE PARENT OR CAREGIVER:</p> <ol style="list-style-type: none"> 1. In the case of direct disclosure by the student that the trafficker is NOT family, relatives, friends, or others connected to the family, then the District Trafficking Liaison should contact parent/caregiver to discuss resources and supports for the student. 2. In the case that CPS or law enforcement discloses that it is safe to contact parents or caregivers. <p>Student should be informed of the School employee’s intent to contact parents or caregivers once it has been determined to do so.</p> <p>DO NOT CONTACT PARENT OR CAREGIVER if a student or anyone else discloses that parents, relatives, friends, neighbors are involved. Report information to CPS (step 2).</p>
<p>Step 7 Student Support Services</p>	<p>The Student Support Team, which includes the District Trafficking Liaison, will determine the best person for monitoring and regular check-ins with the student.</p> <p>The Student Support Team should meet bi-monthly or as needed to discuss the students’ needs for ongoing support for the student. The Student Support Team should utilize the Professional Learning Community and community resources to collaboratively brainstorm how to best meet the student’s needs.</p> <p>Utilize the list of community resources for use by the Student Support Team to assist with student’s needs.</p> <p>In the case of a foreign national minor use this link to assist with a child eligibility letter.</p>
<p>Step 8 Ongoing Support and Re-entry</p>	<p>If appropriate, school staff should utilize the District Re-Entry Welcome and Support Plan (in the <i>Appendices</i>) to support a student in their care.</p> <p>Utilize the list of community resources for use by the Student Support Team to assist with student’s ongoing needs.</p>

ACTION STEPS for AT RISK Victim of Human Trafficking

Follow the steps below for response:

<p>Step 1 Determination</p>	<p>Following a meeting with Student Support Team and completion of the MDHHS 5524 form, the student has been determined to be at-risk of experiencing human trafficking.</p> <p>For human trafficking consultation, support and local resources please contact: Safe Haven Ministries at 616-452-6664 to speak to the Community Advocacy Manager.</p>
<p>Step 2 Student Support Services</p>	<p>The Student Support Team, which includes the District Trafficking Liaison, will determine the best person for monitoring and regular check-ins with the student.</p> <p>The Student Support Team should meet monthly or as needed to discuss the students' needs for ongoing support for the student. The Student Support Team should utilize the Professional Learning Community and community resources to collaboratively brainstorm how to best meet the student's needs.</p> <p>The Student Support Team should utilize this list of community resources to assist with student's needs.</p>
<p>Step 3 Parent/Guardian Notification</p>	<p>It is important to assess the potential of familial involvement when notifying parents/caregivers of possible abuse, neglect or factors that contribute to the child's risk of human trafficking.</p> <p>WHEN TO CONTACT THE PARENT OR CAREGIVER:</p> <ol style="list-style-type: none"> 1. In the case of direct disclosure by the student that family, relatives, friends, or others connected to the family are NOT involved, then the District Trafficking Liaison or other Student Support Team member should contact parent/caregiver to discuss resources and support for the student. 2. In the case that CPS or law enforcement discloses that it is safe to contact parents or caregivers. <p>The student should be informed of the school employee's intent to contact parents or caregivers once it has been determined to do so.</p> <p>DO NOT CONTACT PARENT OR CAREGIVER if a student or anyone else discloses that parents, relatives, friends, neighbors are involved. Report information to CPS: See step 1 in the action Steps for a POTENTIAL or CONFIRMED victim of human trafficking.</p>
<p>Step 4 Monitoring and Ongoing Needs</p>	<p>The Student Support Team will identify a staff person for monitoring and regular check-ins with the student.</p> <p>If further concerns present themselves (ex: changes in attendance, behavior, wellness) school staff should assess possible risk factors and return to the action steps at the beginning of this protocol.</p> <p>If appropriate, school staff should utilize the District Re-Entry Welcome and Support Plan to support students in their care.</p>

Engaging or Re-engaging Trafficked Students

Planning and establishing a supportive team for re-entry for a student who has experienced human trafficking, or another form of exploitation is a key component to a person-centered response. Use the [Student Re-Engagement and Re-Entry: Welcome Support Plan](#) as a toolkit for establishing a building appropriate response to students who are re-entering/re-engaging after experiencing human trafficking.

Community Resources and Service Providers

Community resources and partnerships are essential to provide appropriate wrap around support services to a student and their family.

West Michigan Human Trafficking Coalition

The West Michigan Human Trafficking Coalition is a collaboration of cross-sector leaders who discuss ongoing needs and strategies across our community related to issues of human trafficking. The group meets monthly and consists of representatives from the healthcare, labor trafficking, education, law enforcement and victim services sectors.

Community Service Providers

Kent County is rich in resources to serve youth and families who are at-risk or are experiencing exploitation or abuse. The SEE: Human Trafficking Coalition has worked to create an expanded, up-to-date resource guide accessible to schools and community members. Referral service agencies and the [community resource list](#) document are maintained and updated monthly by the HTYPE team and coalition leadership to ensure accurate agency and program information.

Contact information for the HTYPE team members that are responsible for maintaining and updating the community resource list are in the [community resource list](#) document. The HTYPE team member's contact information will be updated immediately in the community resource list document if a change occurs.

To report a concern about a current resource or agency linked in the [Community Resource List](#), or to recommend a resource or agency not on the list, contact a [HTYPE team member](#).

A quick list of appropriate community-based services for youth and families is listed below. For a full and updated list of community services, reference this [list](#).

Shelter & Wrap Around Services	Phone Number
Arbor Circle - The Bridge Program	(616) 451-3001; Toll Free 1-877-275-7792
Bethany Christian Services	(616) 375-3361
AYA: drop in for youth and housing	(616) 406-3945
Sacred Beginnings - housing drop-in center	(616) 443-6233
Manasseh Project - youth housing	(616) 942-2110
The Salvation Army - Housing Assessment Program (HAP)	2-1-1 or 800-887-1107
YWCA of West Central Michigan	(616) 459-4681 Main

Legal and Advocacy Services	Phone Number
Children's Assessment Center	(616) 336-5160
Hispanic Center of Western Michigan	(616) 742-0200
Legal Aid of West Michigan	(616) 774-0672
Michigan Migrant Legal Assistance	(616) 454-5055
University of Michigan Trafficking Law Clinic	(734) 615-5055

MONITORING COMPLIANCE WITH THE HTSSP

Professional Learning Community

Each school district will be part of a monthly Professional Learning Community of the Human Trafficking Youth Prevention Education (HTYPE) partners and community agency members of the area Human Trafficking Coalition. These monthly meetings will bring together school district staff and support agencies to share de-identified information to engage in cooperative learning and resource sharing. This will also provide an opportunity for districts which have implemented this protocol to report their referrals and have accountability for compliance with the Human Trafficking School Safety Protocol. The collaborative dialogue will also support schools through updated community referral sources, law enforcement engagement, and child protective services support so they are equipped to navigate the complexities of prevention and intervention of human trafficking of minor victims.

Data Collection and Reporting

Each district will work with the Kent ISD HTYPE Grant Coordinator to establish systems within their student management systems for identifying and reporting at-risk, potential , or confirmed cases of human trafficking in collaboration with the OTIP grant requirements. This reporting system will be utilized and share identified data points with the Kent ISD Human Trafficking Youth Education Prevention Coordinator and specified in monthly reporting.

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UNACCOMPANIED MIGRANT YOUTH—SUPPLEMENTAL GUIDE

Minor refugees or immigrants who are in the United States without their parents have often experienced significant loss and turmoil before and during their journey to the United States and may face more in the months after they arrive. The [National Center for Safe Supportive Learning Environments](#) cites that even short-term separation between parents and children can increase the likelihood of conflict when families are reunified. In the meantime, teens who are placed with non-family sponsors or caregivers are at risk for abuse, homelessness, and trafficking. Ironically, migrant youth coming to the United States may be forced by the journey itself into labor trafficking because they may have to pay off the debt they or family members incurred to get to the United States.

The following information was provided by [Office of Trafficking In Persons, Administration of Children and Families](#):

Risk Factors among Unaccompanied Migrant Youth

- History of abuse and neglect
- Victims of domestic violence
- Racial and ethnic minorities
- Individuals with disabilities
- Low socioeconomic status
- Runaway and homeless youth
- Communities exposed to intergenerational trauma
- Lesbian, gay, bisexual, transgender, and questioning (LGBTQ) individuals
- Exposure to community violence

Common Red Flags

Physical	Behavioral	Social and Environmental
<ul style="list-style-type: none"> • Sexually transmitted infections • High number of sexual partners • Multiple pregnancies or abortions • Dental Issues • Bruising and burns • Signs of self-harm • Weight loss or malnourishment • Suicide attempts • Physical abuse • Sexual Abuse 	<ul style="list-style-type: none"> • Confusing or contradicting stories • Inability to concentrate • Protects person who exploited them • Minimizes abuse • Guilt and shame about experiences • Suicidal ideations • Extreme timidity • Aggressive, antagonistic, or defensive • Heightened stress response • Posttraumatic stress disorder • Withdrawn or depressed 	<ul style="list-style-type: none"> • Not able to speak for oneself or share information • Evidence of being controlled • Reports that they live at their worksite • Reports that there were multiple people in cramped living space • Absent from school • Failing grades • Sudden increase in substance use • Age-inappropriate romantic partner • Frequently running away

Factors that Impact Screening and Identification

- Minor lacks awareness of victimization.
- Minor has complex trauma.
- Screener is busy and rushing the interview with the minor.
- Minor has been coached by the trafficker.
- Screener asks direct questions, asks for details, and does not try to understand the full situation or elicit a full narrative from the minor.
- Minor fears that trafficker will cause harm to them, their family, or their loved ones.
- Screener lacks knowledge about human trafficking.
- Language or cultural barriers between minor and screener.
- Minor fears deportation or law enforcement.
- Minor thinks exploitation is normal.
- Minor distrusts screeners and authorities.
- Minor feels shame or guilt.
- Screener does not conduct the interview in a trauma-informed manner.

Federal Reporting Requirements

- **24 Hour Reporting Requirements**
“Not later than 24 hours after a federal, state, or local official discovers that a person who is under 18 years of age may be a victim of a severe form of trafficking in persons, the official shall notify HHS to facilitate the provision of interim assistance.” (Trafficking Victims Protection Act of 2000, as amended)
- **Reporting Requirements for Mandated Reporters**
Human trafficking is now included in the definition of child abuse. Therefore, mandated reporters are now required to follow their state and local child welfare reporting requirements and report trafficking accordingly. (Justice for Victims of Trafficking Act of 2015)

Requirements to Report and Request Assistance

- There are concerns of **possible forced labor or commercial sex at any point** in the minor’s life.
- The minor is a **non-U.S. citizen and non-lawful permanent resident**.
- The minor is currently **under the age of 18** and is currently located in the United States.

Steps to Request Assistance

If you are working with a foreign national minor (non-US citizen/legal permanent resident and currently under 18) and have concerns that they may have experienced forced labor or commercial sex at any point in their life, take the following steps:

1. Submit an RFA through the [Shepherd Case Management System](#)
2. [Visit disclaimer page](#)
3. If you want to discuss the case with the OTIP Child Protection Specialists before submitting the RFA, you can call them during normal business hours (9:00 am to 5:00 pm ET) at 202-205-4582.
4. Submit any clarifying or new information by selecting New Information on your Requests list page in Shepherd.
5. While the case is pending, check the status on your Requests list page in Shepherd.

[Instructions to Request for Assistance \(pdf\)](#)
[Request for Assistance Form \(printable\)](#)

Case Management Services

Trafficking Victims Assistance Program (TVAP)

Trafficking-specific, comprehensive case management services and some out-of-pocket expenses for foreign national minors who have experienced human trafficking.

U.S. Committee for Refugees and Immigrants

1-800-307-4712

TraffickingVictims@uscridc.org

Contact Information

Lauren Devine, Child Trafficking Prevention and Protection Coordinator

Email: Lauren.Devine@acf.hhs.gov

Phone: 202-205-5778

Child Email: ChildTrafficking@acf.hhs.gov

Case Staffings: 202-205-4582

Shepherd: shepherd.otip.acf.hhs.gov/

OTIP Website: acf.hhs.gov/otip

NHTTAC Website: nhttac.acf.hhs.gov/