School/School District

Human Trafficking School Safety Protocol (HTSSP)

(Academic Year)

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Human Trafficking School Safety Protocol (HTSSP)

The Human Trafficking School Safety Protocol (HTSSP) is a guide for educators and other school staff that is used to:

1. ensure the safety of students, educators, and other staff reporting human trafficking and other forms of violence,
2. ensure that educators and other staff comply with state mandatory reporting laws, and
3. ensure that students are connected with service providers and/or programs that will reduce further exposure to violence and victimization.

Click on the links below to jump to that specific section in the HTSSP.

Step	Assess the situation if you think you have a **potential** victim of human trafficking
1	Call the Child and Family Well-Being Department (CFWB, formerly Child Welfare Services) to submit a report.
2	Report and coordinate with law enforcement when appropriate.
3	Investigate potential impact on the school campus (safety, harassment, recruitment, etc.).
4	If appropriate, contact parent/guardian/caregiver.
5	Offer resources for counseling and/or social services.
6	Set up regular contact with the student for follow-up support.

Step	Assess the situation if you think you have an **identified** victim of human trafficking
1	Call the Child and Family Well-Being Department (CFWB, formerly Child Welfare Services) to submit a report.
2	Report and coordinate with law enforcement when appropriate.
3	Investigate potential impact on the school campus (safety, harassment, recruitment, etc.).
4	If appropriate, contact parent/guardian/caregiver.
5	Determine the appropriateness of school placement.
6	Offer resources for counseling and/or social services.
7	Set up regular contact with the student for follow-up support.

Resources

- **Student Disclosures**
- **Highly Vulnerable Student Populations - Supplemental Guides**
- **SDCOE Human Trafficking Resources**
- **Definitions**
- **Additional Policies and Procedures (Confidentiality, Privacy, Record File Management, Data Collection, HTSSP Monitoring and Compliance**

Potential Victim of Human Trafficking

A potential victim of human trafficking is any individual who is reported or suspected as being a victim of a severe form of trafficking in persons as defined in the Trafficking Victims Protection Act of 2000, as amended.

Steps to take before calling Child and Family Well-Being Department

Consult With Your School's Designated Staff/Site Administrator

Each school site has a designated staff/site administrator along with other staff (i.e., school social workers, counselors, etc.) who have received additional specialized training on human trafficking and are aware of available resources for students, families, and staff. These individuals are part of the human trafficking response team and are available for consultation and referrals. Consider these staff your human trafficking coordinating/support team.

Contact information:

- **Designated Staff**: [name] [room/office] [phone number] [email address]
- **Site Administrator**: [name] [room/office] [phone number] [email address]

If No Disclosure is Made by the Student

If a student has **not** made a disclosure about human trafficking, but staff still have concerns that have been observed or concerns that have been shared by others (i.e., students, other staff), **consult immediately with the designated staff or site administrator.** Designated staff/site administrators will assess the student's situation and determine the appropriate level of support and intervention.

Support for Students

Aligning with a trauma-informed approach, staff want to limit their interactions with a student and the number of times they may have to share any details about their situation. The designated staff/site administrator will be the staff person to speak with the student to assess for appropriate support and level of intervention. There may be some exceptions (see **Some Exceptions to Consider** below). The role of staff is not to investigate or interview the student, and the goal of interacting with the student is not to obtain or encourage a disclosure. However, staff can still conduct a general assessment of immediate needs, provide a supportive response, and explain why the student will be referred to the designated staff/site administrator.

If staff is comfortable doing so and if possible or appropriate…

- find a private space to talk and is free of distractions.
- ask the student if they have any language needs, if they would be more comfortable speaking with someone else, or if they'd like another staff member to join the conversation. See the assistant principal secretary at your school site to request translation/interpreter services.
- explain to the student that you are a mandated reporter, and you may be required to call the Child and Family Well-Being (CFWB) Department (formerly CWS) about these concerns to help keep them safe. But first, you will consult with the designated staff/site administrator .

Below are some helpful prompts for student support and engagement:

- "Are you okay? I have noticed you seem more tired/withdrawn/upset than usual. Would you like to talk to someone about how you are feeling or any struggles you may be experiencing?"
- "Are you able to stay in class, or do you need to talk to someone right now?"
- "How can I support you when you are at school or when you are in class?"
- "I encourage you to ask for help when you are ready. You can let me know, and I will take you to _____."
- "I am referring you to _____. She/he/they are here to listen, have a lot of knowledge about how to support students in difficult situations, and can discuss with you some options, etc."
- "I am grateful you are sharing your need for support and help with me. You deserve to be heard and to feel safe. I am glad to continue to be supportive of you in this process while in the classroom/sports practice/etc.; however, to be fully honest, when a student requests support or shares about difficult situations, usually a couple of other people get involved to support you and help you stay safe or with other needs you may have. Before you share other details about your situation, I wanted to let you know that I may need to report what you've shared with me, and you may have to retell your story."

Some Exceptions to Consider

There may be situations where exceptions need to be made where staff who are not part of the human trafficking coordinating/support team continue to be involved even after a referral has been made to the designated staff/site administrator. For instance, when a student self-discloses directly to a staff member about specific abuse/exploitation, or a student of concern is only willing to talk to a specific staff member about their situation. These exceptions will be made on a case-by-case basis by the designated staff/site administrator.

If a Disclosure Is Made by the Student

If a student makes a disclosure, **consult immediately with the designated staff/site administrator**. Ensure the student's safety by not leaving the student alone. For additional best-known practices for student disclosures, see **Student Disclosures**, Trauma-Informed Approaches to Working with Youth Impacted by Human Trafficking, and Supporting Students and Families After Human Trafficking Disclosure for additional information.

When Staff May Not Need to Call Child and Family Well-Being and/or Law Enforcement

There may be situations where a report to Child and Family Well-Being and/or law enforcement will not be needed. For instance, staff have observed some red flags, or there are students who have been identified as high risk, but there is not enough reasonable concern to call Child and Family Well-Being and/or law enforcement. It still is crucial, however, to address any perceived needs to mitigate further harm. Refer students to the school social worker/counselor for additional support. designated staff/site administrator /counselor will assess the student's situation and determine the appropriate level of support and intervention.

Step 1	**If a potential victim of human trafficking (sex and/or labor trafficking) is suspected, and in coordination with the designated staff/site administrator, submit a mandated report to the Child and Family Well-Being (CFWB) Department.** **If there is imminent danger, call 911. For further details, see Step 2.** If an employee has suspicion or knowledge of suspected child abuse or neglect, they shall follow the below reporting procedures: **Initial Telephone Report** Immediately make an initial report by telephone to the county Child and Family Well-Being department or any police department (excluding a school district police/security department). **NOTE: When calling in to make the report, be specific that the concerns reported are related to human trafficking.** Child Abuse Placement and Protective Services 1-858-560-2191 or 1-800-344-6000 Fax: 858-467-0412 Via Online Reporting Portal: CFWB Web MRA (sandiegocounty.gov) ● Reporting Parties will still need to call the Child Abuse Hotline first. ● Mandated reporters now have the ability to provide follow-up information via the San Diego County CFWB Web Mandated Reporter Application, also known as MRA. Hotline screeners will create an account for the mandated reporter after they have called into the CFWB Hotline to report suspected child abuse, neglect, or exploitation. Once the account is created, reporters will receive an email to set up their account. Mandated reporters will then complete and submit follow-up information through their MRA account. They will have the option to save a copy of the report for their records. **Written Report** Within 36 hours of knowing or observing the information concerning the incident, the mandated reporter shall then prepare and either send, fax or electronically submit to the appropriate agency a written follow-up report, which includes a completed Department of Justice form (SS 8572). Reports are confidential and may be disclosed only to specified persons and agencies. For more information about confidentiality and privacy, click here (insert a link to confidentiality-related school district policies and procedures). CFWB reports will not be filed in the student's cumulative folder and are to be placed in a separate folder in a secure filing cabinet.

	For more detailed information on Child Abuse and Reporting responsibilities, click here (insert a link to Child Abuse and Reporting-related school district policies and procedures). **Coordinating with CFWB** The designated staff/site administrator will make every attempt to coordinate and collaborate with CFWB and any other identified agencies to support students and families. Additional personnel that may assist with the coordination of services may also be an administrator, academic counselor, school social worker, and/or school psychologist. **Other Forms of Violence and Exploitation** If other forms of violence and exploitation are suspected or have been identified, see the above child abuse reporting guidelines and follow Steps 2 - 6.
Step 2	**Coordinating and Reporting to Law Enforcement** Any suspicious activity should be reported immediately to the School Resource Officer (SRO) or the _____ Police Department at _____. If there is imminent danger, call 911. **NOTE: When calling in to make the report, be specific that the concerns reported are related to human trafficking.** If danger is not imminent and it's an issue that can be addressed by CFWB, then defer to CFWB.
Step 3	**Investigate potential impact on the school campus, including harassment, recruitment, and threats to school safety.** Local law enforcement, school resource officer, and/or school site administration investigate possible impact on the school campus, including harassment and/or recruitment, threats to school safety, etc. When possible, if school consequences are needed (i.e., identified offender for bullying, Title IX violations, teen dating violence, recruitment, etc.), they will be in consultation and coordination with the designated staff/site administrator and those responsible for investigations, per EC Section 32282. For more information regarding disciplinary action steps, see (insert a link to disciplinary action-related school district policies and procedures). The designated staff/site administrator will coordinate and refer to the Protocol for Harassment, and for any safety concerns to self or others, see **Threat Assessment Protocol**: Follow (insert a link to threat assessment-related school district policies and procedures). Threat Assessment Forms (insert links if available)
Step 4	**If appropriate, contact and inform parent/guardian/caregiver of potential victimization.** After consultation with law enforcement and/or CFWB, the human trafficking coordinating/support team (i.e., the designated staff/site administrator, school social

	worker, counselor, and/or school psychologist) will determine how and when to contact and inform parent/guardian/caregiver of potential victimization. When possible and appropriate, consulting with the student is crucial to ensure their safety. Aspects to consider regarding whether to reach out to the parents include: ● Whether the caregiver (or close family members) is the trafficker or has any involvement in the trafficking situation. ● Whether the exploitation occurred as a direct result of neglectful supervision or other forms of neglect (i.e., one of the parents knew about the exploitation or level of risk and failed to protect or they were unwilling to). ● Cultural or religious beliefs that will impact the family's response.
Step 5	**Offer the student and/or parent/guardian/caregiver a referral to appropriate counseling or social services.** The designated staff/site administrator will be responsible for making referrals. The school social worker/counselor will follow up regarding on-site and outside resources. All information will be documented as part of a student information system. Follow-up will be scheduled to ensure the family is able to access services. For a list of vetted resources, click here. Vetting consists of assessing organizations for policies and practices that are, but not limited to, the following: ● Trauma-informed ● Multilingual and culturally responsive ● Developmental and age-appropriate ● Accessible services for all ● Inclusivity ● Diversity San Diego County Office of Education (SDCOE) Student Wellness and School Culture staff will vet and update appropriate resources every July and January.
Step 6	**Set up regular contact with the student and periodically check on status.** The designated staff/site administrator should set up regular contact with the student and monitor the support plan and the student's progress. These designated staff/site administrators may be the academic counselor, school social worker, and/or school psychologist. Coordinate and collaborate with community partners and families as appropriate. Some students and their support network (i.e., parent/caregiver/guardian, relatives, etc) may benefit from community-based organizations that offer specific cultural and linguistic approaches and/or services. For instance, a student who has recently immigrated from a village in Vietnam whose second language is English and whose parent(s)/caregiver(s) do not speak English. Collaborating and coordinating services with the Union of Pan Asian Communities (UPAC) may be helpful. Some available culturally and linguistically responsive resources include but are not limited to:

	• Unaccompanied Migrant Youth • LGBTQIA+ Youth • Native Youth • Union of Pan Asian Communities • SouthBay Community Services • Operation Samahan Clinics • Alliance for African Assistance • LaMaestra Community Health Centers

Identified Victim of Human Trafficking **Identified Victims** are those individuals who self-identify as victims of a severe form of trafficking in persons, individuals who have been identified by law enforcement as having been subjected to a severe form of trafficking in persons, or individuals who have been screened by victim assistance providers trained on human trafficking and found to be a victim of trafficking.	
Step to make before calling the Child and Family Well-Being Department	**If a student makes a disclosure, consult immediately with the designated staff/site administrator.** If a student has made a disclosure about human trafficking or Child and Family Well-Being/law enforcement has confirmed a student is a victim of human trafficking, we want to align with the principles of a trauma-informed approach by limiting the number of times a student may have to share any details about their situation. Each school site has a designated staff/site administrator along with other staff (i.e., school social workers, counselors, etc) who have received additional training on human trafficking and are aware of specific available resources for students, families, and staff. Consider these staff as your school site's human trafficking coordinating/support team. These individuals are available for consultation and referrals. Contact information: • **Designated Staff**: [name] [room/office] [phone number] [email address] • **Site Administrator**: [name] [room/office] [phone number] [email address] If staff is comfortable doing so and if possible or appropriate… • find a private space to talk and is free of distractions. • ask the student if they have any language needs, if they would be more comfortable speaking with someone else, or if they'd like another staff member to join the conversation. See the assistant principal secretary at your school site to request translation/interpreter services. • explain to the student that you are a mandated reporter, and you may be required to call CFWB about these concerns to help keep them safe. But first, you will consult with the designated staff/site administrator. **Support for a Student** Staff, however, can still conduct a general assessment of immediate needs, provide a supportive response, and explain why the student will be referred to the designated

staff/site administrator. Below are some helpful prompts for student support and engagement.

- "I am referring you to _____. She/he/they are here to listen, have a lot of knowledge about how to support students in difficult situations, and can discuss with you some options, etc."
- "I am grateful you are sharing your need for support and help with me. You deserve to be heard and to feel safe. I am glad to continue to be supportive of you in this process while in the classroom/sports practice/etc.; however, to be fully honest, when a student requests support or shares about difficult situations, usually a couple of other people get involved to support you and help you stay safe or with other needs you may have. Before you share other details about your situation, I wanted to let you know that I may need to report you, and you may have to retell your story."

For additional best practices for student disclosures, see **Student Disclosures**, Trauma-Informed Approaches to Working with Youth Impacted by Human Trafficking, and Supporting Students and Families After Human Trafficking Disclosure for additional information.

Step 1	**In coordination with the designated staff/site administrator, contact and submit a detailed mandated report to the Child and Family Well-Being Department.** **If there is imminent danger, call 911. For further details, see Step 2.** If an employee has suspicion or knowledge of suspected child abuse or neglect, shall follow the below reporting procedures: **Initial Telephone Report** Immediately make an initial report by telephone to the county Child and Family Well-Being department and any police department (excluding a school district police/security department). **NOTE: When calling in to make the report, be specific that the concerns reported are related to human trafficking.** Child Abuse Placement and Protective Services **1-858-560-2191** or **1-800-344-6000** Fax # 858-467-0412 Via Online Reporting Portal: CFWB Web MRA (sandiegocounty.gov) ● Reporting Parties will still need to call the Child Abuse Hotline first. ● Mandated reporters now have the ability to provide follow-up information via the San Diego County CFWB Web Mandated Reporter Application, also known as MRA. Hotline screeners will create an account for the mandated reporter after they have called into the CFWB Hotline to **report** suspected child abuse, neglect, or exploitation. Once the account is created, reporters will receive an email to set up their account. Mandated reporters will then complete and submit follow-up information through their MRA account. They will have the option to save a copy of the report for their records. The link to the website is below. **Written Report** Within 36 hours of knowing or observing the information concerning the incident, the mandated reporter shall then prepare and either send, fax or electronically submit to the appropriate agency a written follow-up report, which includes a completed Department of Justice form (SS 8572). Reports are confidential and may be disclosed only to specified persons and agencies. For more information about confidentiality and privacy, click here (insert a link to confidentiality-related school district policies and procedures). CFWB Reports will not be filed in the student's cumulative folder and are to be placed in a separate folder in a secure filing cabinet. For more detailed information on Child Abuse and Reporting responsibilities, click here (insert a link to Child Abuse and Reporting-related school district policies and procedures). **Coordinating with CFWB**

	The designated staff/site administrator will make every attempt to coordinate and collaborate with CFWB and any other identified agencies to support students and families. Additional personnel who might assist with the coordination of services may also include an academic counselor, school social worker, and/or school psychologist. **Other Forms of Violence and Exploitation** If it has been determined that the student has experienced other forms of violence and exploitation, see the above child abuse reporting guidelines and follow Steps 2 - 7.
Step 2	**Contacting and coordinating with law enforcement.** Any suspicious activity should be reported immediately to a School Resource Officer (SRO) or the _____ Police Department at _____. **If there is imminent danger, call 911.** **NOTE: When calling in to make the report, be specific that the concerns reported are related to human trafficking.** If danger is not imminent and it's an issue that can be addressed by CFWB, then defer to CFWB.
Step 3	**Investigate potential impact on the school campus, including harassment, recruitment, and threats to school safety.** Local law enforcement, school resource officer, and/or school site administration investigate possible impacts on the school campus, including harassment and/or recruitment, threats to school safety, etc. When possible, if school consequences are needed (i.e., identified offender for bullying, Title IX violations, teen dating violence, recruitment, etc.), they will be in consultation and coordination with the designated staff/site administrator and those responsible for investigations, per EC Section 32282. For more information regarding disciplinary action steps, see (insert a link to disciplinary action-related school district policies and procedures). The designated staff/site administrator will coordinate with their site administrator to refer to the Protocol for Harassment, and for any safety concerns to self or others, see **Threat Assessment Protocol**: Follow (insert a link to threat assessment-related school district policies and procedures). Threat Assessment Forms (insert links if available).
Step 4	**If appropriate, contact and inform parent/guardian/caregiver of potential victimization.** After consultation with law enforcement and/or CFWB, the school site team (i.e., the designated staff/site administrator, school social worker, counselor, and/or school psychologist) will determine how and when to contact and inform parent/guardian/caregiver of potential victimization. When possible and appropriate, consulting with the student is crucial to ensure their safety. Aspects to consider regarding whether to reach out to the parents include: ● Whether the caregiver (or close family members) is the trafficker or has any involvement in the trafficking situation. ● Whether the exploitation occurred as a direct result of neglectful supervision or other forms of neglect (i.e., one of the parents knew about the exploitation or level of risk and failed to protect or were unwilling to).

	• Cultural or religious beliefs that will impact the family's response.
Step 5	**Investigate whether the school placement is appropriate for the student; if not, work with the appropriate department to transfer the student.** Each school site has predetermined school personnel (i.e., academic counselor, administrator, school social worker, and/or school psychologist) who will meet with the student and family to co-create a support plan to address concerns. This may include referrals to community agencies for additional support and safety and appropriateness of school placement. The personnel should set up regular contact with the student and monitor the action plan and the student's progress.
Step 6	**Offer the student and/or parent/guardian/caregiver a referral to appropriate counseling or social services.** The designated staff/site administrator will be responsible for making referrals. The school social worker/counselor will follow up on on-site resources as well as follow up on outside resources. All information will be documented as part of a student information system. Follow-up will be scheduled to ensure the family is able to access services. For a list of vetted resources, click here. Vetting consists of assessing organizations for policies and practices that are, but not limited to, the following: • Trauma-informed • Multilingual and culturally responsive • Developmental and age-appropriate • Accessible services for all • Inclusivity • Diversity San Diego County Office of Education (SDCOE) Student Wellness & School Culture staff will vet and update appropriate resources every July and January.
Step 7	**Set up regular contact with the student and periodically check the status.** The designated staff/site administrator should set up regular contact with the student and monitor the support plan and the student's progress. These designated staff/site administrators may be the academic counselor, school social worker, and/or school psychologist. Coordinate and collaborate with community partners and families as appropriate. Some students and their supports may benefit from community-based organizations that offer specific cultural and linguistic approaches and/or services. For instance, a student who has recently immigrated from a village in Vietnam, whose second language is English, and whose parent(s)/caregiver(s) do not speak any English. Collaborating and coordinating services with the Union of Pan Asian Communities (UPAC) may be helpful. Some available culturally and linguistically responsive resources include, but are not limited to: • Unaccompanied Migrant Youth • LGBTQIA+ Youth • Native Youth • Union of Pan Asian Communities

- SouthBay Community Services
- Operation Samahan Clinics
- Alliance for African Assistance
- LaMaestra Community Health Centers

Resources

Student Disclosures (or Self-Disclosure)

If a student makes a direct disclosure, Listen - Reassure - Respect. Consult immediately with the designated staff/site administrator. Ensure the student's safety by not leaving the student alone.

Staff can also refer to Trauma-Informed Approaches to Working with Youth Impacted by Human Trafficking and Supporting Students and Families After Human Trafficking Disclosure.

Listen

- Go to a place that's private and free of distractions.
- Let the student use their own words—avoid asking leading questions.
- Try to remain calm. Do not express shock, panic, or disbelief, as this may cause a student to feel anxious or that they have done something wrong, and they may withhold or withdraw information.
- Be supportive and non-judgmental.

Reassure

- Reassure the student that it is OK that they have told you what's been happening.
- Reassure the student that they are not at fault.
- Check your tone of voice and help the child understand your feelings. Say, "I am feeling concerned for you. What can we do right now to help you feel safer?"
- Address any concerns about the student's safety.

Respect

- Respect that the student may only reveal some details.
- Acknowledge the student's bravery and strength.
- Avoid making promises you can't keep—manage the student's expectations.
- Explain to the student that for them to be safe, you will need to report their experience to someone else.

Highly Vulnerable Student Populations and Supplemental Guides
It is important to recognize that while all youth are vulnerable to abuse and exploitation, there are some subpopulations or specific situations that may increase the level of risk. This section provides several resources for staff to refer to for more information concerning some subpopulations.

How to Support Students Identified as High Risk
The likelihood of a student becoming a victim of violence and exploitation increases when risk factors are present. These risk factors, such as poverty, racism, homelessness, knowing someone already involved in human trafficking, truancy, poor academic performance, mental and behavioral issues, and substance use, can make students very vulnerable. Additionally, some students may be involved in relationships where they may be experiencing teen dating violence or are being bullied or cyberbullied. These situations can make students vulnerable as well. Often, school staff are aware of such risk factors but may not be familiar with how these risk factors can set a student on a trajectory to experience more harm. The importance of training school staff from a holistic prevention standpoint has the potential to reduce the likelihood of a student experiencing trafficking in the first place.

Observing some red flags or students who have been identified as high-risk does not always require an automatic report. There may be situations where a report to Child and Family Well-Being and/or law enforcement will not be needed. For instance, staff have observed some red flags, or there are students who have been identified as high risk, but there is not enough reasonable concern to call Child and Family Well-Being and/or law enforcement. However, it is still crucial to address any perceived needs to mitigate further harm. The earlier a student can be screened and referred for an assessment of needs by the designated staff/site administrator, the sooner current issues and risks can be addressed.

A Risk Factors and Indicators of Human Trafficking Supplemental Guide is available for staff to reference.

Students should also receive information on who and where to go if they need support and assistance. Remind the student counselors and social workers that are available at the school, and they can walk in and speak to someone.

More information is provided below, which includes a list of Supplemental Guides for staff to refer to:

- Supporting Students and Families After Human Trafficking Disclosure
- Foster Youth
- Unaccompanied Migrant Youth
- Homeless Youth
- LGBTQIA+ Youth
- Students with Disabilities
- Native Youth
- Safety Planning
- Trauma-Informed Approaches to Working with Youth Impacted by Human Trafficking

Engaging or re-engaging students who have experienced human trafficking or are at risk of experiencing chronic truancy or falling behind.
Every school has a site leadership team that implements campus-wide wellness initiatives and problem-solve ways to support at-risk students. Students who have experienced human trafficking and have experienced or are at risk of experiencing chronic truancy or falling behind will be evaluated by the student support team to assess the known risk factors and identify appropriate protective factors to re-engage them in the school community.

How to Support Students Who Have been Exploited
Particularly for students who have been exploited they may have additional unique needs that require a trauma-informed approach and referrals to specific supports and resources to meet those needs. Because of the abuse associated with child trafficking, many victims experience severe physical, emotional, and psychological trauma. The symptoms of trauma can impact the learning experience of students and may manifest as post-traumatic stress, depression, anxiety, difficulty learning, aggression, or truancy (Palines et al., 2020). Other needs that may present include stable and safe housing, language needs, and immigration assistance. It is strongly recommended that the designated staff/site administrator is consulted to assess and connect the student with the most appropriate services.

(source: Palines, P., Rabbitt, A., Pan, A., Nugent, M., & Ehrman, W. (2020). Comparing mental health disorders among sex trafficked children and three groups of youth at high-risk for trafficking: A dual retrospective cohort and scoping review. *Child Abuse & Neglect, 100).*

SDCOE Human Trafficking Resources

Definitions