

# FLORIDA DEPARTMENT OF JUVENILE JUSTICE PROCEDURE



**Title:** Human Trafficking Procedures

**Related Policy:** FDJJ 1925

## I. DEFINITIONS

**Commercial Sex Act** - Any sex act, including, but not limited to, exotic dancing, erotic massage, hotel/street/internet prostitution, escort services and pornography, on account of which anything of value is given to or received by any person.

**Commercial Sexual Exploitation of Children (CSEC)** - Another term used for the sex trafficking of minors in which a youth (under 18 years of age) is induced to perform a commercial sex act.

**Contractor** - A service provider who provides services on a recurring basis pursuant to a contractual agreement with the agency.

**Department-approved screening tool** - A screening tool specifically designed to screen for potential human trafficking victimization that has been approved for use by the Department of Juvenile Justice.

**Department Staff** - An employee of the Department, an employee of a contracted provider, a person contracted by a contracted provider.

**Detention center** - A facility primarily used for the temporary confinement of youth who have recently been arrested, detained, or are being transferred to or from a court, jail, prison, residential facility, or other agency.

**Domestic Servitude** - A form of human trafficking found in unique circumstances (informal work in a private residence). Domestic workers perform work within their employers' households, such as cooking, cleaning, youth-care, elder care, gardening and other household work, but receive no or minimal compensation.

**Florida Abuse Hotline** - The entity in the Department of Children and Families that receives allegations of child abuse and neglect. Child Protective Investigators conduct investigations of allegations of abuse and neglect.

FLORIDA DEPARTMENT OF JUVENILE JUSTICE

SUBJECT: **Human Trafficking Procedures**

SECTION: **FDJJ - 1925**

**Human Trafficking**<sup>i</sup> - The federal Trafficking Victims Protection Act defines “severe forms of trafficking in persons” as:

- a. sex trafficking in which a 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; or
- b. 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.

A victim need not be physically transported from one location to another in order for the crime to fall within these definitions.

**Intake facility** - A facility primarily used for the intake of a youth upon arrest for screening and processing purposes, including Juvenile Assessment Centers.

**Pimp and/or Trafficker** - Person responsible for the trafficking of a victim. This person can be any gender, race, nationality and could also be a parent, street gang or organized crime syndicate.

**Recruitment** - The process of identifying a youth who has vulnerabilities that can be exploited by the trafficker. The recruitment can be done by the pimp/trafficker or by a youth already working for the pimp. Recruitment can take place over the course of several days or weeks or could be a one-time interaction.

**Residential facility** - A facility primarily used for the confinement of youth pursuant to the juvenile justice system or criminal justice system.

**Shelter** - A shelter housing runaway and homeless youth represented by Florida Network of Youth and Family Services, Inc.

**Youth** - Any person under the supervision or care of the Department of Juvenile Justice.

## **II. STANDARDS/PROCEDURES**

### **A. Intake Facility Admissions**

1. Youth who meet any of the following criteria shall be screened with a Department-approved screening tool for possible victimization during the intake screening process:
  - a. History of running away or getting kicked out of the home 4 or more times, where running away includes times that the youth did not voluntarily return within 24 hours and includes incidents not reported by or to law enforcement;
  - b. History of sexual abuse;
  - c. Current incident or history of sex offense, including prostitution;

---

<sup>i</sup> United States, Department of State 2012 Trafficking in Persons Report. <http://www.state.gov/documents/organization/192587.pdf>

FLORIDA DEPARTMENT OF JUVENILE JUSTICE

SUBJECT: **Human Trafficking Procedures**

SECTION: **FDJJ - 1925**

- d. Youth's acknowledgement of being trafficked; and/or
  - e. Report of human trafficking by parent/guardian, law enforcement, medical or service provider, teacher, youth protective services and/or Department staff.
2. Department staff shall ensure all youth with disabilities (including, for example, youth who are deaf or hard of hearing or those who have intellectual, developmental, psychiatric, or speech disabilities), have an equal opportunity to participate in or benefit from all aspects of the Department's efforts to prevent, detect, and respond to human trafficking victimization. The Department shall also ensure meaningful access to its efforts to prevent, detect, and respond to human trafficking victimization to youth whose English proficiency is limited, including steps to provide interpreters who can interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary. The facility may not use youth, youth's family member or other non-staff adults as interpreters, readers, or other assistance to perform such functions except in limited circumstances where an extended delay in obtaining an effective interpreter/reader/assistant could compromise the youths' safety.
  3. For safety purposes, whenever possible, Department staff shall complete the Department-approved screening tool with the youth without the presence of a parent/guardian or other adult who is not Department staff. If the parent is not present, the screener shall not discuss any information related to human trafficking with the youth's guardian until the youth portion of the Department-approved screening tool has been completed, as throughout the screening tool it may be determined a parent or guardian is the alleged perpetrator of abuse. If the parent is present during intake and, after Department staff explains the benefits of doing the screening alone with the youth, the parent states that he or she prefers to be present during the screening, Department staff shall acquiesce and record their presence during the screening within the Department-approved screening tool.
  4. If the youth "likely is" or "definitely is" a victim of human trafficking as indicated by the Department-approved screening tool or discloses being a victim of human trafficking, or if Department staff is "not sure" if the youth is a victim of human trafficking, the Department staff who completed the Department-approved screening tool with the youth shall contact the Florida Abuse Hotline at 1-800-96-ABUSE. The name and ID number of the operator shall be recorded within the Department-approved screening tool on JJIS. The report to the Florida Abuse Hotline shall be made via phone and shall not be faxed in or made online. If the person screened is 18 years of age or older, then Department staff shall obtain informed consent from the youth before reporting information regarding their trafficking victimization to the National Human Trafficking Resource Center at 1-888-373-7888 in place of calling the Florida Abuse Hotline. National Human Trafficking Resource Center call information should be recorded within the Department-approved screening tool on JJIS.
  5. If Department staff are unable to complete the call to the Florida Abuse Hotline on the initial attempt, the Department staff member who completed the screening with the youth should attempt to contact the Hotline again. If the Department staff member is unable to complete the report after three attempts, he or she shall notify their immediate supervisor that a report has not been completed. The date and time of each call attempt and the date and time of the supervisor notification should be recorded in the text box designated for DCF Abuse Hotline call information at the end of the Department-approved screening tool. The supervisor shall be

FLORIDA DEPARTMENT OF JUVENILE JUSTICE

SUBJECT: **Human Trafficking Procedures**

SECTION: **FDJJ - 1925**

responsible for ensuring all cases necessitating a report to the Florida Abuse Hotline have been called in to the Florida Abuse Hotline within 72 hours of the completion of the Department-approved screening tool. Once a call is completed, the Department staff shall record the call information in the Department-approved screening tool completed on the youth.

6. If the Florida Abuse Hotline accepts the abuse report or if a call was placed to the National Human Trafficking Resource Center, then the Department staff who completed the screening with the youth or his/her supervisor shall ensure the appropriate Human Trafficking related alert is entered into JJIS.
  - a. CSEC Possible -
    - i. Is a person who has been assessed using a Department-approved screening tool and shows indicators of having been a victim of commercial sexual activity.
  - b. Labor Trafficking Possible -
    - i. Is a person who has been assessed using a Department-approved screening tool and shows indicators of being involved in forced labor other than commercial sexual exploitation.
7. If there is any question regarding whether a call should be made to the Florida Abuse Hotline, Department staff shall consult with their immediate supervisor. Department staff should remember, for the human trafficking maltreatment code, the suspected perpetrator does not need to be a caregiver and the staff does not need the suspected perpetrator's name to call in the report. If a supervisor is not available, then Department staff shall proceed with calling the Florida Abuse Hotline to report potential human trafficking.
8. If the Florida Abuse Hotline accepts the abuse report, Department staff shall utilize the E-mail function within the Department-approved screening tool on JJIS to E-mail their local Department of Children and Families' (DCF) human trafficking representative, their Circuit's Juvenile Probation Human Trafficking Liaison and DJJ's Human Trafficking Director with information gathered from the Department-approved screening tool. Youth responses to questions shall be on a need-to-know basis to ensure sensitive information is not shared to the youth's detriment by staff or other youth.
9. If a youth who is 18 years of age or older is a suspected victim of human trafficking and a call was placed to the National Human Trafficking Resource Center, Department staff shall utilize the E-mail function within the Department-approved screening tool on JJIS to E-mail DJJ's Human Trafficking Director and their Circuit's Juvenile Probation Human Trafficking Liaison with information gathered from the Department-approved screening tool. DCF shall not be E-mailed for youth who are 18 years of age or older.
10. Department staff shall use the paper-based Department-approved screening tool when interviewing the youth. The Department staff person who completed the paper-based screening tool shall be the same staff person who enters the information into the computer-based screening tool. The paper-based Department-approved screening tool shall be placed in the youth's file and provided to the youth's assigned Juvenile Probation Officer.
11. Department staff shall document all tattoos for identification purposes. In the event the staff suspects the tattoo indicates the youth is a victim of human trafficking or is gang involved, a photograph of the tattoo shall be taken and uploaded into JJIS, not kept on the local server and

FLORIDA DEPARTMENT OF JUVENILE JUSTICE

SUBJECT: **Human Trafficking Procedures**

SECTION: **FDJJ - 1925**

the photograph of the suspicious tattoo shall also be E-mailed to the Human Trafficking Director. Photographs will only be taken of tattoos that are on parts of the body not traditionally covered by a bathing suit. If the youth refuses to have his or her tattoos photographed, Department staff shall document this refusal in the youth's Case Notes.

12. If, at any time during the screening, the youth has a traumatic reaction or appears to become emotionally distressed, Department staff shall immediately discontinue the screening and, if available, seek mental health support for the youth. If possible, complete the Department-approved screening tool with the youth at a later time, when the youth has emotionally stabilized. If Department Staff are unable to complete the Department-approved screening tool with the youth, staff shall record in the youth's Case Notes that the tool was not completed and inform the youth's assigned Juvenile Probation Officer via E-mail. The youth's Juvenile Probation Officer shall be responsible for ensuring the tool is completed within 14 days of the initial assessment attempt.
13. If Department-staff is unable to complete the Department-approved screening tool on a youth who met the criteria for screening due to lack of cooperation or other uncontrollable circumstances, Department staff shall record the tool was not completed in the youth's Case Notes and inform the youth's assigned Juvenile Probation Officer via E-mail. Youth's Juvenile Probation Officer shall be responsible for ensuring the tool is completed within 14 days of the initial assessment attempt. If, during the 14-day period, the Juvenile Probation Officer, due to uncontrollable circumstances, is unable to complete the Department-approved screening tool with the youth, the youth's assigned Juvenile Probation Officer shall documents all reasons for not screening in the youth's Case Notes. If there are any indicators of abuse or neglect that would require a mandatory report to the Florida Abuse Hotline, Department staff shall call the Hotline and record the call information in the youth's Case Notes and, if the abuse falls under the DCF Human Trafficking Maltreatment Code, Department staff shall also record the call information in the youth's Department-approved screening tool.
14. Youth shall not be disciplined or verbally confronted for refusal to answer any particular question on the Department-approved screening tool or for not disclosing complete information.
15. Department staff shall complete the Department-approved screening tool on any youth for which the criteria listed under Procedure A, Section 1 is met, including youth who reside out-of-state, but have been arrested in the state of Florida. The Department-approved screening tool can be completed upon arrest at the intake facility or upon the youth's return to the state of Florida on a Notice To Appear, but shall occur immediately after the completion of the PACT. If the Department-approved screening tool necessitates a call the Florida Abuse Hotline, Department staff shall inform the Report taker that it is an emergency situation and request that a Child Protective Investigator meet with the youth immediately. Follow the same procedure on entering alerts.
16. If new information regarding potential trafficking victimization is ascertained on a youth who has not had a new arrest, charge or intake since the most recent Department-approved screening tool was completed with him or her and it has been no longer than 30 days since the most recent tool was completed, the Department intake staff who received the new information or the youth's assigned Juvenile Probation Officer shall edit the youth's Department-approved screening tool on JJIS. Department staff shall record information regarding the edits made and the dates on which they were made in the designated area of the Department-approved screening tool on JJIS.

FLORIDA DEPARTMENT OF JUVENILE JUSTICE

SUBJECT: **Human Trafficking Procedures**

SECTION: **FDJJ - 1925**

Department staff shall not erase any original text or previous edit information; however, the screening tool can be edited more than once if necessary. A call regarding the additional information shall be placed to the Florida Abuse Hotline at 1-800-96-ABUSE. If a call was not previously placed based on the initial Department-approved screening tool answers or if the initial report was not accepted, then Department staff shall update the questions within the Department-approved screening tool regarding the Florida Abuse Hotline to reflect that the Florida Abuse Hotline was called and whether or not the report was accepted.

17. If a call was previously made and the report was accepted, then Department staff shall record the details of the supplemental call to DCF in the text box designated for edits within the Department-approved screening tool on JJIS.

**B. Release**

1. After the decision is made that the youth who is a suspected or verified victim of trafficking cannot or should not be detained, Department staff shall attempt to release the youth to a parent(s)/guardian(s) or a responsible adult. If a youth cannot be released home in a timely manner (within the 6 hour policy target), Department staff shall ensure transportation is provided to the home or a shelter with documentation of receipt of the youth by a responsible adult.
2. The first option for release is always the parent(s)/guardian(s), unless the youth is in the legal custody of the Department of Children and Families, then the first option is to release to the agency having legal custody. If a parent(s)/guardian(s) refuses to accept the youth or cannot be located, Department staff shall attempt to release the youth to a responsible adult.
  - a. If a parent(s)/guardian(s) or responsible adult cannot be located, Department staff shall follow circuit procedures for securing temporary placement in a shelter or contact a protective investigator. (Refer to the Interagency Agreement: Children Denied Shelter.)
  - b. Department staff shall notify the parent(s)/guardian(s) of the youth's placement. The Juvenile Probation Officer assigned to the youth shall obtain the parent(s)/guardian(s) signature on the *Authorization for Evaluation and Treatment (AET)* form when the youth is placed outside of the parent(s)/guardian(s) home.
3. Prior to releasing a youth, Department staff shall use discretion and caution in the determination of release, including to whom the youth should be released. When Department staff attempts to release a youth, staff shall request the following information from the person to whom the youth may be released:
  - a. Full Name (First, Middle, Last);
  - b. Physical Address;
  - c. Telephone Number(s) (Home, Cell, Work, Emergency);
  - d. Place of Employment, including Address; and
  - e. Valid Picture Identification, such as a Driver's License, Passport, Military ID or State Issued ID Card.
4. Prior to releasing any youth to a relative or responsible adult, Department staff shall conduct a criminal history background check of the person to whom the youth is to be released.

FLORIDA DEPARTMENT OF JUVENILE JUSTICE

SUBJECT: **Human Trafficking Procedures**

SECTION: **FDJJ - 1925**

- a. If the person has an open charge or prior felony conviction, a conviction for child abuse, drug trafficking, or prostitution, that person is not a responsible adult and the youth shall not be released to that person. Department staff shall attempt to locate another responsible adult.
  - b. If the youth's parent(s)/guardian(s) has an open child abuse or neglect investigation, then Department staff shall document efforts to contact the Abuse Investigator prior to releasing the youth.
5. If a youth is a possible or verified victim of sex trafficking and/or labor trafficking and is being released from the juvenile assessment center and/or intake facility to a non-secure detention setting, then Department staff shall take precautions in addition to those listed above prior to releasing the youth to ensure the youth is not released to their trafficker/pimp, including extending the 6 hour time as long as it does not violate FS 985.115 and each of the following:
- a. If the youth has been referred to DJJ previously, then Department staff shall utilize any prior JJIS records to confirm the identification of the adult attempting to pick up the youth.
  - b. Require any adult requesting to pick up the youth to present a valid driver's license or photo identification. When possible, eligible certified Department staff shall run their information through FSFN, DAVID, FCIC/NCIC and CCIS.
  - c. If an adult is unknown to Department staff and is stating a specific relationship to the youth, then Department staff shall ask additional details separately to both the youth and adult to verify the validity of the stated relationship.
  - d. If Department staff is unsure whether or not the presenting adult should be deemed responsible, they shall speak with their immediate supervisor for further direction.
6. Department staff shall complete all appropriate paperwork regarding the release, including a release form documenting the person to whom the youth is being released and their pertinent information.
7. If a youth is being released from a Detention Center, Department staff shall follow the rules regarding release from a secure Detention Center outlined in Secure Detention, 63G-2.020 Admissions, Orientation and Releases.

**C. Disclosure Made Outside of Intake Process**

1. If during the normal course of the youth's interaction with Department staff, outside of the intake process, the youth discloses being a victim of human trafficking, or Department staff suspects the youth is a victim, then Department staff shall notify their supervisor and contact the Florida Abuse Hotline at 1-800-96-ABUSE immediately. The name and ID number of the operator shall be recorded into the youth's JJIS notes. If the person is 18 years of age or older, then the call shall be placed to the National Human Trafficking Resource Center at 1-888-373-7888 in place of calling the Florida Abuse Hotline. An alert shall not be placed into JJIS unless a Department-approved screening tool has been completed.
2. After calling the Florida Abuse Hotline, Department staff shall contact their Circuit's Juvenile Probation Office Human Trafficking Liaison via a high-importance E-mail to report the disclosure and the outcome of the call to the Florida Abuse Hotline. The Human Trafficking Liaison shall ensure a trained Department staff member completes a Department-approved screening tool with the youth within 48 hours.

FLORIDA DEPARTMENT OF JUVENILE JUSTICE

SUBJECT: **Human Trafficking Procedures**

SECTION: **FDJJ - 1925**

3. If one has not already been completed, a mental health referral shall be submitted immediately any time a youth discloses being a victim of human trafficking, staff suspects the youth is a victim, or any time the Department-approved screening tool reveals possible victimization. Details from the youth's disclosure indicating potential trafficking victimization or indicators of potential victimization from staff suspicions or the Department-approved screening tool shall be expressed on the referral and, when possible, directly to the mental health staff member.
4. If the Florida Abuse Hotline accepts the abuse report or if a call was placed to the National Human Trafficking Resource Center, then the Department staff member who completed the screening tool with the youth or his/her supervisor shall ensure the appropriate human trafficking related alert is entered into JJIS.
  - i. CSEC Possible - a person who has been assessed using a Department-approved screening tool and shows indicators of having been a victim of commercial sexual activity.
  - ii. Labor Trafficking Possible - a person who has been assessed using a Department-approved screening tool and shows indicators of being involved in forced labor other than commercial sexual exploitation.

**D. Other Information Regarding the Department-Approved Screening Tool**

1. After completing the PACT, Department staff shall only be prompted by JJIS to complete the Department-approved screening tool when there is a new charge, new arrest and/or new intake. The Department-approved screening tool is not required to be completed as a part of any PACT reassessment unless new information indicating that the youth may be a victim of human trafficking has been obtained since the completion of the most recent Department-approved screening tool.
2. The Department's Human Trafficking Director shall be responsible for ensuring there is a continual mechanism for training all Department staff responsible for intake services on the Department-approved screening tool.

**E. Staff Training**

1. Human Trafficking training requirements for Direct Care Staff are outlined in FDJJ 1520, Employee Training and Florida Administrative Code Rule 63-H, Staff Training.
  - a. Those employees referenced in FDJJ 1520 are required to take a refresher training every two years. The Department, or responsible contracted entity, shall be responsible for devising a way to ensure and/or document that their employees referenced in FDJJ 1520 have completed the required initial and biennial human trafficking training.
2. Training requirements for the Department-approved screening tool are outlined in the Interoffice Memorandum: HTST Training Requirements and Acknowledgement Form accessible on the Department's website under the Probation Policy Memoranda tab.
  - a. The Department, or responsible contracted entity, shall be responsible for devising a way to ensure and/or document that their employees referenced in the Interoffice Memorandum: HTST Training Requirements and Acknowledgement Form have completed the required initial and an annual Department-approved screening tool training.



FLORIDA DEPARTMENT OF JUVENILE JUSTICE

SUBJECT: **Human Trafficking Procedures**

SECTION: **FDJJ - 1925**

**F. Delivery of Services**

1. If a DCF human trafficking investigation is initiated for a DJJ-involved youth, Department staff, specifically the youth's assigned Juvenile Probation Officer and/or the Circuit's Juvenile Probation Human Trafficking Liaison, shall attend all multi-disciplinary team staffings regarding that youth to strategize appropriate services and placement.
2. If a youth is known to be a possible or verified victim of sex or labor trafficking while in a Detention Center or Residential Facility, Department staff shall complete and submit a mental health referral immediately.
3. If a youth is known to be a possible or verified victim of trafficking while under supervision or on intake status with the Department, but not in a Detention Center or Residential Facility, then Department staff shall make a referral to a local service provider for services necessary to address their victimization. This shall be done in consultation with DCF.
4. If a community-based youth frequently absconds making it difficult to put services in place, Department staff shall work in consultation with DCF to determine if it is appropriate and necessary to put support services in the home for the youth's guardian and any other youth in the home, where available.
5. Refer to FDJJ 1919 II.B.4 for information regarding youth access to outside support services and legal representation.

**G. Human Trafficking Liaisons**

1. The Department's Human Trafficking Director shall be responsible for maintaining an up-to-date list of Juvenile Probation and Juvenile Detention Human Trafficking Liaisons located throughout the state.
2. The Human Trafficking Director shall be responsible for developing and providing a list of responsibilities for both the Juvenile Probation and Juvenile Detention Human Trafficking Liaisons.
3. The Department's Chief Probation Officers shall be responsible for designating at least one Juvenile Probation employee within their Circuit that will serve as the Juvenile Probation Human Trafficking Liaison for that entire circuit. The designated staff member should be able to meet the responsibilities of the role as provided by the Department's Human Trafficking Director.
4. The Department's Detention Regional Directors shall be responsible for designating at least one Detention Center employee within each facility in their region that will serve as the Juvenile Detention Human Trafficking Liaison for their facility. The designated staff member should be able to meet the responsibilities of the role as provided by the Department's Human Trafficking Director.

**H. Recruitment**

1. If, at any time, a youth states or a Department or contracted staff member suspects a youth is recruiting other youth for the purpose of sex or labor trafficking, the staff shall immediately interrupt the recruitment activity.

FLORIDA DEPARTMENT OF JUVENILE JUSTICE

SUBJECT: **Human Trafficking Procedures**

SECTION: **FDJJ - 1925**

2. The facility shall develop and implement a system that ensures staff working directly with the youth are advised of the status of a youth identified as a risk or as posing a risk to others. Treatment teams in Residential Facilities and supervising staff in Detention Centers should continually review the youth's adjustment.
3. Each Detention Center, Residential Facility shall have a designated individual responsible for reporting any recruitment activity to the Department's Human Trafficking Director within 72 hours of the recruitment incident. The Detention Human Trafficking Liaison shall serve as the individual designated to report any recruitment activity that takes place within their Detention Center.
4. Shelter staff shall have a designated individual responsible for reporting any recruitment activity to the designated person at the Florida Network for Youth and Family Services' Headquarters within 72 hours of the recruitment incident.
5. If one has not ready been completed, a mental health referral shall be submitted immediately upon any suspicion that a youth is recruiting other youth. Concerns that the youth may be recruiting other youth should be expressed on the referral and, when possible, directly to the mental health staff member.
6. Department and contracted staff shall take additional precautions, including placing the youth on single room status, with any youth who enters a Detention Center or Residential Facility with a human trafficking alert, as the youth could present as a recruiter or be vulnerable to recruitment.
7. Any youth suspected of recruiting other youth for the purpose of labor and/or sex trafficking, may still meet the definition of a sex trafficking victim while recruiting; therefore, Department and contract staff shall follow the same intake procedure and/or procedures for a disclosure made outside of the intake process.

**I. Other JJIS Alerts Information**

1. The Department's Juvenile Probation Human Trafficking Liaisons shall determine the outcome of each abuse case within their designated circuit that was called into the Florida Abuse Hotline. If the outcome of the investigation was not "verified," then no further action as to the alerts shall be taken. If the outcome of the investigation was "verified," then the Department's Juvenile Probation Human Trafficking Liaison shall modify the human trafficking related alert in JJIS to the appropriate alert:
  - a. CSEC Verified -
    - i. Is a person who has been assessed using a Department-approved screening tool and shows indicators of and/or disclosed having been a victim of commercial sexual exploitation and who has been verified by the Department of Children and Families as a victim of Sex Trafficking.
  - b. Labor Trafficking Verified -
    - i. Is a person who has been assessed using a Department-approved screening tool and shows indicators of and/or disclosed having been exploited via forced labor and who has been verified by the Department of Children and Families as a victim of Labor Trafficking.
2. The Department's Juvenile Probation Human Trafficking Liaison shall close the CSEC Possible and/or Labor Trafficking Possible alert pertaining to a youth after he or she enters a CSEC Verified and/or Labor Trafficking Verified alert for the youth.

FLORIDA DEPARTMENT OF JUVENILE JUSTICE

SUBJECT: **Human Trafficking Procedures**

SECTION: **FDJJ - 1925**

3. If a youth with possible or verified trafficking alerts is going to a Detention Center or Residential Facility, Department or contracted staff shall also enter Critical Alert - SINGLE ROOM ONLY.
4. All Human Trafficking alerts in JJIS shall only be entered by Department or contracted staff who have completed the required training on the Department-approved screening tool. Human Trafficking alerts shall be entered under the following guidelines:
  - a. CSEC Possible and Labor Trafficking Possible alerts shall be entered only after the youth has been screened by trained Department staff using the Department-approved screening tool and a report has been accepted by the Florida Abuse Hotline.
  - b. CSEC Verified and Labor Trafficking Verified alerts shall only be entered by the Department's Juvenile Probation Human Trafficking Liaison upon determining that the Department of Children and Families' abuse case outcome was "verified."
5. If Department Staff suspects that the youth is involved in recruiting other youth for the purpose of labor or sex trafficking and/or if Department Staff has any identifying information regarding the alleged trafficker/pimp, this information should be recorded in the narrative section when an CSEC or Labor Trafficking alert is entered. Department staff shall also include this information in the youth's Case Notes.

**J. Non-delinquent Youth**

1. Youth who meet any of the following criteria shall be screened with a Department-approved screening tool for possible victimization during the intake screening process:
  - a. History of running away or getting kicked out of the home 4 or more times, where running away includes times that the youth did not voluntarily return within 24 hours and includes incidents not reported by or to law enforcement;
  - b. History of sexual abuse;
  - c. Youth's acknowledgement of being trafficked; and/or
  - d. Report of human trafficking by parent/guardian, law enforcement, medical or service provider, teacher, youth protective services and/or Shelter staff.
2. For safety purposes, whenever possible, Shelter staff shall complete the Department-approved screening tool with the youth without the presence of a parent/guardian or other adult who is not Shelter staff. If the parent is not present, the screener shall not discuss any information related to human trafficking with the youth's guardian until the youth portion of the Department-approved screening tool has been completed, as throughout the screening tool it may be determined a parent or guardian is the alleged perpetrator of abuse. If the parent is present during intake and, after Shelter staff explains the benefits of doing the screening alone with the youth, the parent states that he or she prefers to be present during the screening, Shelter staff shall acquiesce and record their presence during the screening within the Department-approved screening tool.
3. If the youth "likely is" or "definitely is" a victim of human trafficking as indicated by the Department-approved screening tool or discloses being a victim of human trafficking, or if Shelter staff is "not sure" if the youth is a victim of human trafficking, the Shelter staff who completed the Department-approved screening tool with the youth shall contact the Florida Abuse Hotline at 1-800-96-ABUSE. The name and ID number of the operator shall be recorded within the youth's Case Notes.

FLORIDA DEPARTMENT OF JUVENILE JUSTICE

SUBJECT: **Human Trafficking Procedures**

SECTION: **FDJJ - 1925**

4. If there is any question regarding whether a call should be made to the Florida Abuse Hotline, Shelter staff shall consult with their immediate supervisor. Department staff should remember, for the human trafficking maltreatment code, the suspected perpetrator does not need to be a caregiver and the staff does not need the suspected perpetrator's name to call in the report.
5. If the Florida Abuse Hotline accepts the abuse report, Shelter staff shall provide a copy of the Department-approved screening tool to the Department of Children and Families' (DCF) Child Protective Investigator investigating the abuse report. Youth responses to questions shall be on a need-to-know basis to ensure sensitive information is not shared to the youth's detriment by staff or other youth.
6. If Shelter staff are concerned that youth may be a victim of exploitation due to labor, or sex trafficking they shall implement the Special Populations policy at their discretion to provide for the immediate support and supervision needs of the youth.
7. If, at any time during the screening, the youth has a traumatic reaction or appears to become emotionally distressed, Shelter staff shall immediately discontinue the screening. If possible, complete the Department-approved screening tool with the youth at a later time, when the youth has emotionally stabilized. If Shelter Staff are unable to complete the Department-approved screening tool with the youth, staff shall record in the youth's Case Notes that the tool was not completed. Shelter supervisory staff shall be responsible for ensuring that the tool is completed within 14 days of the initial assessment attempt.
8. If Shelter staff is unable to complete the Department-approved screening tool on a youth who met the criteria for screening due to lack of cooperation or other uncontrollable circumstances, Shelter staff shall record that the tool was not completed in the youth's Case Notes, Shelter supervisory staff shall be responsible for ensuring the tool is completed within 14 days of the initial assessment attempt. If there are any indicators of abuse or neglect that would require a mandatory report to the Florida Abuse Hotline, Department staff shall call the Hotline and record the call information in the youth's Case Notes and, if the abuse falls under the DCF Human Trafficking Maltreatment Code, Department staff shall also record the call information in the youth's Department-approved screening tool.
9. Youth may not be disciplined for refusal to answer any particular question on the Department-approved screening tool or for not disclosing complete information.
10. If during the normal course of the youth's interaction with Shelter staff, outside of the intake process, the youth discloses being a victim of human trafficking, or Shelter staff suspects the youth is a victim, then Shelter staff shall notify their supervisor and contact the Florida Abuse Hotline at 1-800-96-ABUSE immediately. The name and ID number of the operator shall be recorded into the youth's notes.
  - a. Shelter supervisory staff shall ensure a trained Department staff member completes a Department-approved screening tool with the youth within 48 working hours.
11. If one has not already been completed, a mental health referral shall be submitted immediately any time a youth discloses being a victim of human trafficking, staff suspects the youth is a victim, or any time the Department-approved screening tool reveals possible victimization. Details from the youth's disclosure indicating potential trafficking victimization or indicators of potential victimization from staff suspicions or the Department-approved screening tool shall be expressed on the referral and, when possible, directly to the mental health staff member.

**III. RESPONSIBILITY AND DUTIES**

A. All Department Staff:

1. It is the responsibility of all Department staff and contracted staff to contact the Florida Abuse Hotline if a youth discloses or the staff member suspects a youth is a victim of any form of human trafficking.