



**Praesidium and Office of the Texas
Governor Child Sex Trafficking
Team**

**Minimum Standards and Best
Practices:**

**Abuse Risk Management and
Prevention**

**Service Quality and Operational
Effectiveness**

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Introduction

Responding to the unique needs of survivors of the commercial sexual exploitation of youth (CSEY), specialized advocates in Texas are rising to the challenge, providing support to law enforcement and child welfare investigators during crisis recoveries and assistance to survivors starting with that first contact and continuing services for an extended period of time. The valuable work of the CSEY advocate agencies (advocates) is recognized as fundamental to the most successful outcomes experienced by survivors and their families, first responders and service providers.

In partnership with The Texas Governor's Office, Child Sex Trafficking Team (CSTT), Praesidium developed abuse risk management (ARM) minimum standards and best practices for these advocates. Simultaneously, CSTT worked with Praesidium, advocates and other stakeholders to develop minimum and best practice standards for service quality and effectiveness.

Since 1991, Praesidium's mission is "to help you protect those in your care from abuse and to help preserve trust in your organization." Praesidium works with organizations across the world to prevent the sexual abuse of children and vulnerable adults, to prevent false allegations of abuse against employees and volunteers, and to prevent the loss of reputation and revenue for organizations serving vulnerable populations. For over two decades Praesidium has served more than 4,000 clients and offers a full range of abuse risk management and loss control services.

Using root cause analysis, Praesidium developed its own abuse risk management model, The Praesidium Safety Equation.[®] Root cause analyses of several thousand incidents of sexual abuse across industries demonstrated that risks fell into eight operations: Policies, Screening and Selection, Training, Monitoring and Supervision, Internal Feedback Systems, Consumer Participation, Responding, and Administrative Practices. By implementing abuse prevention standards of practice in each of these operations, Praesidium determined that risks could be reduced or eliminated.

Minimum standards were developed in each operation of the Safety Equation, identifying the minimum expectations for how advocates should safely operate and provide services through an abuse risk management lens. Additional best practices were identified for advocates to further enhance safe program practices. These abuse risk management minimum standards and best practices complement the service quality and effectiveness standards by offering additional focus on protecting the youth survivor, the individual advocate, and the advocate agency in their important work. Advocates will self-assess their current program operations against these ARM minimum standards and best practices when they complete Praesidium's online self-assessment tool, *Know Your Score!*

Priorities for the service quality standards were identified by leaders from existing advocates at a day-long roundtable session in Austin. In addition to that framework, these standards reflect the limited research available on this specialized service, current operational standards for advocate services not targeted to CSEY populations, operational experience of existing CSEY advocate providers, and the most salient advocacy service needs of survivors, first responders and other stakeholders. Praesidium's abuse risk management standards and the insights of their organization's leadership also informed the development of the quality standards.

Collectively, the following standards are expected to have a significant impact on this work. Standards will help advocates to operate safely, effectively and with greater consistency between them. Organizations considering engagement with or already in existing partnerships with advocates will better understand the breadth and limitations of the advocates' work and how they can improve coordination. Ultimately, these standards will ensure the best possible outcomes for everyone committed to this work and most importantly, for all CSEY survivors.

Texas Child Sex Trafficking Advocate Program Minimum Standards and Best Practices for Abuse Risk Management and Prevention

Policies

Policies define the bandwidth of acceptable behavior in a program. Because offenders often violate policies to gain access to youth, when staff know and understand policies, they can identify, interrupt, and report policy violations. Simply interrupting a policy violation can prevent a false allegation of abuse or put an offender on notice that no one works in private, the rules apply to everyone, and violations will be detected.

Minimum Standards

1. The organization has a policy prohibiting the abuse or mistreatment of youth.

Description: We have a written policy that specifically prohibits the abuse or mistreatment of youth. The policy is communicated in writing and verbally to all staff, and staff know and can describe the policy.

Rationale: Having written policies that prohibit abuse leaves no room to question that an organization is committed to protecting youth and maintaining an "abuse-free organization."

2. The organization has a policy prohibiting abuse or mistreatment of one youth by another youth.

Description: We have a written policy that specifically prohibits the abuse or mistreatment of one youth by another youth. The policy is communicated in writing and verbally to all staff, and staff know and can describe the policy.

Rationale: Organizations should clearly describe what constitutes acceptable and unacceptable interactions between youth. Hazing, bullying, harassment, intimidation, name-calling, sexual innuendos, and verbal and physical aggression, for example, must be prohibited. Clear behavioral descriptions permit staff and youth to easily identify interactions that are not permitted and that may forewarn of more serious abuse.

3. The organization has a policy defining appropriate and inappropriate physical contact between staff and youth.

Description: We have a written policy that specifically defines appropriate and inappropriate physical contact with youth. The policy is communicated in writing and verbally to all staff, and staff know and can describe the policy. Our physical affection policy includes examples of:

Appropriate Physical Contact	Inappropriate Physical Contact
<ul style="list-style-type: none"> • Side hugs • Shoulder-to-shoulder or "temple" hugs • Pats on the shoulder or back • Handshakes • High-fives and hand slapping • Verbal praise • Pats on the head when culturally appropriate • Touching hands, shoulders, and arms • Holding hands (with young children) 	<ul style="list-style-type: none"> • Full-frontal hugs* • Kisses • Showing affection in isolated areas • Lap sitting • Wrestling • Piggyback rides • Tickling • Allowing a youth to cling to another staff's leg • Any type of massage given by or to a youth • Any form of affection that is unwanted by the youth or the staff • Compliments relating to physique or body development • Touching bottom, chest or genital areas

* Justification for approval of full-frontal hugs may be granted by both clinical and administrative leadership for individual survivors. That approval must include documentation of factors considered in assessment, staff for whom approval is granted, and identification of environmental conditions (e.g. only with other adults present) and survivor's emotional state.

Rationale: A written policy defining appropriate and inappropriate physical contact between staff and youth protects everyone. With clear best practices in place, everyone knows the rules, violations are more easily detected, and false allegations are less likely to occur.

4. The organization has a policy defining appropriate and inappropriate verbal interactions between staff and youth.

Description: We have a written policy that specifically defines appropriate and inappropriate verbal interactions between staff and youth. The policy is communicated in writing and verbally to all staff, and staff know and can describe the policy. Our verbal interactions policy includes examples of:

Appropriate Verbal Interactions	Inappropriate Verbal Interactions
<ul style="list-style-type: none"> • Positive reinforcement • Appropriate jokes • Encouragement • Praise • Strength-based conversations 	<ul style="list-style-type: none"> • Name-calling • Secrets • Cursing • Off-color or sexual jokes • Shaming • Belittling • Derogatory remarks

	<ul style="list-style-type: none"> • Discussing sexual encounters or in any way involving youth in the personal problems or issues of staff • Harsh language that may frighten, threaten or humiliate youth • Derogatory remarks about the youth or his/her family
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Rationale: A written policy defining appropriate and inappropriate verbal interactions between staff and youth protects everyone. With clear best practices in place, everyone knows the rules, violations are more easily detected, and false allegations are less likely to occur.

5. The organization has a policy for managing the risk when one staff must be alone with one youth.

Description: During the advocate and youth relationship, interactions will likely be one-on-one. Privacy like this can increase risk for both youth and advocate. We have a written policy that specifically defines how to manage this risk and protect against false allegations or adult-to-youth boundary violations. The policy is communicated in writing and verbally to all staff, and staff know and can describe the policy. Our one-on-one interaction policy includes the following information:

Our one-on-one interaction policy includes the following information:

- When meeting one-on-one with a youth, attempt to do so in a public place where you are in full view of others.
- Avoid physical affection that can be misinterpreted
- Allow the youth to initiate physical contact and do not excessively engage in physical contact when alone with youth.
- If meeting in a room or office, leave the door open or move to an area that can be easily observed by others passing by.
- Ensure one-on-one interactions are documented, and to the extent possible are scheduled in advance or are communicated with the supervisor.
- Document and immediately report any unusual incidents, including disclosures of abuse or maltreatment, behavior problems and how they were handled, injuries, or any interaction that might be misinterpreted.
- Ensure the policy clearly communicates appropriate scenarios in which one-on-one interactions and physical affection may occur.
- In addition to the elements above, when authorized to transport youth alone in a vehicle, all agency requirements will be followed, as delineated in item 3 of the Monitoring and Supervision section of this document.

Rationale: Abuse is a private event: Most abuse occurs when an adult is alone with one youth in a secure or isolated area, or when two youth are out of sight of other youth or adults. Advocate programs require frequent one-on-one interactions to provide appropriate support for the youth in care. While such interactions are legitimate to the

program, they may introduce increased risk of abuse or false allegations of abuse. Consequently, they require specialized risk management practices.

6. The organization has a policy governing interaction and contact between staff and youth after case closure or service termination.

Description: We have a written policy that specifically defines acceptable interactions between staff and youth after a youth has been discharged from advocate services and their case has been closed. These policies describe changes, if any, that may apply to interactions between staff and the youth after other forms of case closure: law enforcement/prosecution's investigative case, youth is no longer under DFPS conservatorship, youth completes probation/parole status with juvenile justice authorities, and/or the youth is discharged from care coordination. The policy is communicated in writing and verbally to all staff, and staff know and can describe the policy.

Our contact after case closure policy includes examples of:

- Any ongoing relationships with youth following case closure must be maintained via the organization's professional website and other defined communication channels such as one's work email address, work phone number or social media accounts established by the organization for the expressed purpose of communication with survivors
- Do not continue to engage or befriend youth via social media networks, unless a supervisor has discussed and approved this type of interaction
- Encourage and provide youth with referrals/community resources as needed on behalf of the organization
- Continue to document any contact with youth
- From time to time, include other advocate team members in approved correspondence with youth to dilute any misrepresentation of a singular relationship between the adult and the youth.

Rationale: Formally directing and limiting the scope of how and to what extent staff may maintain communication or contact with youth after discharge from services can help prevent false allegations and adult-to-youth abuse. Defining expectations for managing contact after case closure helps protect both youth and the organization while still respecting the trust-based relationship formed during advocate services.

7. The organization has a policy prohibiting staff from accessing, displaying, or possessing inappropriate information or pornography on the organization's property or technological equipment.

Description: We have a written policy that prohibits the access, display, production, possession, or distribution of pornography. The policy is communicated in writing and verbally to all staff, and staff know and can describe the policy.

Rationale: Offenders routinely use pornography in print and on computers, mobile devices, DVDs, and television to lure or blackmail potential victims.

8. The organization has a policy governing electronic communication between staff and youth.

Description: We have a written policy that includes guidelines about the use of electronic communication, such as cell phones, text messages, emails and social networking sites between staff and youth. The policy is communicated in writing and verbally to all staff, and staff know and can describe the policy. Our electronic communication policy includes examples of:

Appropriate Interactions	Inappropriate Interactions
<ul style="list-style-type: none"> • To the degree possible, staff should utilize corporate or agency-issued mobile phones to communicate with youth rather than staff’s personal cell phone • Whenever necessary, sending and replying to emails and text messages from youth only when copying in a supervisor and when subject to regular review by a supervisor • Communicating through “organization group pages” on Facebook or other approved public forums • “Private” profiles for staff that youth cannot access or befriend • Documenting all electronic communication in the organization’s case note system • If staff connect with youth on social media through friending, following, etc. such communication is documented and includes: the platform used, the content of the communication, and the date and time • Reviewing all electronic communication with a supervisor during scheduled supervision meetings • Ensure any conversation that may be interpreted as inappropriate is immediately forwarded to the advocate’s supervisor • Use electronic communication strategically to communicate with youth; be mindful of conversations 	<ul style="list-style-type: none"> • Harsh, coercive, threatening, derogatory, intimidating, shaming, demeaning or humiliating comments • Conversations via electronic communication reflecting sexual stimulation or gratification. This does not include topics such as sexually transmitted infections, pregnancy prevention, sexual safety planning or sexual abuse prevention which may be permissible under agency supervisory review. • Posting pictures of organization participants on social media sites • Posting inappropriate comments on pictures • Use of staff’s personal social media accounts for communication with youth or to conduct any advocate agency case management business, in lieu of organization-established platforms

that take place outside of daytime hours and ensure they are about necessary topics related to the youth's care	
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Rationale: Electronic communication and social media, such as email, instant messaging, Facebook, Instagram, Snapchat, and texting, are forms of contact that are relied upon heavily by youth that are currently experiencing or have escaped from trafficking. These platforms can offer anonymity, safe channels for communication between advocates and youth and opportunities to stay connected despite trafficking victims commonly experiencing significant geographic relocations. Because this communication can be done privately, it creates opportunities for inappropriate, unauthorized, and non-organization-related communication and activity. Therefore, electronic communication and social media activity between youth and staff must be documented and regularly reviewed and discussed with the advocate's supervisor.

9. The organization has a policy stating that it takes every allegation of abuse seriously and that it will cooperate fully with the authorities.

Description: We have a written policy specifically stating that we take every suspicion or allegation of abuse seriously and that we cooperate fully with authorities. The policy is communicated in writing and verbally to all staff, and staff know and can describe the policy.

Rationale: Clearly stating the organization's response to abuse communicates to potential abusers the organization's "zero tolerance for abuse" best practice.

10. The organization requires new staff to read and sign a statement informing them of their legal and ethical duty to report suspected abuse.

Description: We have a written policy that specifically requires all new staff to read and sign a statement informing them of their duty to report suspected child abuse. The policy is communicated in writing and verbally to all staff, and staff know and can describe the policy.

Rationale: Requiring staff to sign an acknowledgement of the organization's abuse-reporting requirement ensures that they know the policy, understand their responsibility to report abuse to the appropriate authorities, and are aware of the organization's commitment to protecting youth and staff.

11. The organization requires all staff to sign a statement indicating that they have read and agree to comply with all organization policies.

Description: All staff are required to sign a statement that they have read and agree to comply with all our organization's policies, and we keep a copy of the signed statement on file.

Rationale: An organization's policies and procedures are essential to effective abuse risk management. They define the organization's philosophy and how staff are to operate within the organization. Having policies and procedures is not enough: staff must also know, understand, and adhere to them. The first step to ensuring that staff know the policies and procedures is requiring them to carefully read the policies and sign a statement indicating that they have read and agree to comply with all policies.

12. The organization annually reviews all youth abuse prevention policies for relevance, utility and necessity, and modifies or rescinds as appropriate, and all staff are systematically notified of changes as they are implemented. *minimum standard

Description: We periodically review our policies and routinely announce policy changes at staff meetings and during training sessions.

Rationale: Policies can only work if staff know and use them, and if they are current and relevant. Over time, some policies will no longer apply, others will need revisions, and new policies will be added.

13. The organization requires all staff to sign a statement indicating that they will cooperate fully with any investigation by, or of, the advocate agency or its representatives and that failure to do so may lead to disciplinary action up to and including termination from employment.

Description: We have a written policy that specifically requires all new staff to read and sign a statement indicating that they will cooperate fully with any investigation of, or by, the advocate agency and that failure to do so may be grounds for disciplinary action up to and including termination from employment.

The policy is communicated in writing and verbally to all staff, and staff know and can describe the policy.

Rationale: Requiring staff to agree in writing that they will cooperate fully with any child abuse, sexual assault or other investigations related to advocate individual or agency program operations on behalf of youth helps remove potential barriers should an investigation be required. If a staff member refuses to cooperate, an investigation could be stalled, and the organization's hands tied from taking the action necessary to protect everyone's rights and ensure a safe environment.

Screening and Selection

Offenders must have access to youth before they can offend, so programs must do everything possible to avoid giving access to anyone who should not be in a position of trust with youth. With comprehensive screening and selection, organizations discover and consider everything they can about applicants, and use knowledge about how offenders operate in making hiring decisions. A robust screening and selection process may also deter individuals who should not have access to children and minors from applying. An exceptional screening and selection process requires the coordination of team members across all levels of the organization; including, but not limited to, leadership staff, directors, survivor leaders, and advocates.

Minimum Standards

1. The organization requires applicants to complete a standardized application designed to screen for the potential to abuse.

Description: Our application collects information about the applicant's work history, education, volunteer history, background, and suitability for a position of trust with youth. The application format makes it easy to spot missing information (i.e. incomplete addresses or social security numbers, employment gaps, overqualifications, etc.), and the application is not accepted until all required information is supplied by the applicant.

Rationale: A standardized application serves three purposes. First, it allows the organization to gather information about the applicant's qualifications for the position. Second, it allows the organization to gather information about the applicant's level of risk to abuse. Finally, it allows the organization to clearly communicate to the applicant that the organization maintains a zero tolerance for abuse" best practice.

2. As part of the screening and selection process, the organization requires applicants to read and sign a Code of Conduct which includes information about behavioral expectations of all staff.

Description: Early in the screening process, applicants sign our Code of Conduct which includes information about appropriate and inappropriate interactions with youth, and we keep on file a copy of the signed Code of Conduct from each employee.

Rationale: A Code of Conduct communicates acceptable standards of behavior and the organization's commitment to keeping youth and staff safe. This effectively sends a clear message that abuse in any form will not be tolerated by the organization.

3. The organization conducts face-to-face interviews which include behaviorally based interview questions designed to screen applicants for the potential to abuse and their ability to serve as a qualified advocate.

Description: Our organization requires a face-to-face interview. All interviews are documented with notes from each interviewer. We use behavioral interviewing methods and standardized questions (including questions designed to assess the applicant's level of risk to abuse a youth), and during the interview discuss the organization's commitment to protect youth from sexual abuse. We use behaviorally based interview questions to discuss an applicant's potentially traumatic past experiences and determine what role in the organization is the best fit for the applicant. Under unique circumstances, interviews may be conducted on the telephone or over the Internet.

Rationale: The interview process, with the advantage of face-to-face interaction, offers tremendous opportunity for identifying the suitability of applicants. It helps assess individual experiences, values, attitudes, and skills that determine whether the applicant meets the organization's standards. In addition, the interview provides another opportunity to communicate to the applicant that the organization maintains "zero tolerance for abuse." Using standardized interview questions helps ensure that applicants are thoroughly screened and treated fairly.

4. The organization conducts reference checks, including a personal or family reference, designed to screen applicants for the potential to abuse.

Description: Our organization checks a minimum of three references, both personal and professional, on each applicant before an applicant is offered a position. Whenever possible, the organization contacts previous employers and gathers information which goes beyond an employment verification. We use questions that assess the applicant's level of risk to abuse a youth. All reference responses are documented and considered when making a hiring decision. If written references are accepted, the organization independently confirms the authenticity of a random sample and follows up on red flags or missing information.

Rationale: Reference checks are valuable because they are a source of information that does not come directly from the applicant. References may be used to validate information provided by the applicant or by other references, to identify additional references and, most importantly, to describe the applicant from another person's perspective. Family members can be a good source of information because they often have information unavailable to others. Research indicates that family members of applicants who are looking to harm a child are more likely to provide an honest reference in order to protect the applicant from further trouble and/or the organization from risk of harm. Using standardized questions helps ensure that references are asked questions likely to yield information useful in the decision-making process and that all candidates are subject to the same level of screening activity.

5. The organization conducts criminal background checks that meet or exceed state or licensing and program-specific requirements on all new hires.

Description: Prior to access with youth, all new hires are required to undergo a criminal background check that meets or exceeds the following criteria:

- a. A multi-state criminal records search

- b. A social security number trace and alias search
- c. An individual county level search in every county the applicant has lived, over the last seven years
- d. A national fingerprint-based search
- e. In addition, proof that the check has been completed and has been reviewed and is kept on file.
- f. Texas Department of Family and Protective Services criminal history check

Rationale: Not all criminal background checks are equal. Meeting these criteria helps ensure that an organization is collecting useful and comprehensive information. Prevailing industry best practice dictates that criminal records be checked as a minimum precaution. In addition, simply letting applicants know that criminal history checks are completed may deter unacceptable applicants from pursuing employment.

- g. The organization repeats criminal background checks on all continuously employed staff at least once every two years, or more frequently if required by state or program-specific regulations, and at time of rehire for returning or seasonal staff.

Description: We complete background checks every two years on all continuously employed staff or more often if required by regulations. For returning or seasonal staff, we complete background checks at rehire or re-activation of employment activities.

Rationale: Periodically repeating criminal background checks helps ensure that staff information is current and that no one who presents a risk has access to youth. Completing a criminal background check on rehires or seasonal staff upon their return helps ensure that no criminal activity has occurred since they were last employed that would make them unsuitable for employment.

- h. The organization conducts a national sex offender registry check on all new hires.

Description: Our organization uses the national sex offender registry check as one measure of a person's suitability for employment at our organization. We repeat the registry check every two years or any time a staff member has been absent for six months or longer.

Rationale: A national sex offender registry check is another level of thoroughness in the screening and selection process and in the protection of youth served by an organization.

- i. All applicant information is reviewed and utilized throughout the screening process.

Description: First, our organization involves at least three people in the screening and selection process. Then, our organization involves everyone who participated in the screening process, and systematically considers information from all sources (the application, references, criminal background and sex offender registry check, and interviews) before extending an offer of employment.

Rationale: When one staff reviews an application, another staff conducts the reference checks, and two or more staff interviews the applicant, each has only one piece of the available applicant information. However, each piece in the screening process is designed to be used in conjunction with the other pieces. For example, answers on the application should be verified through reference checks and interviews. The applicant's answers in the interview also should be verified through statements on the application and information from references. Ultimately, the hiring decision should be based on analysis of all the information gathered.

- j. The organization requires staff to immediately notify their supervisor and human resources if they are arrested or convicted of a crime while they are employed by the organization.

Description: Our organization uses this information to determine if the staff remains suitable for a position with access to youth, or if the nature of the offense requires the organization to take steps to ensure the safety of youth in our care and/or protect the reputation of our organization.

Rationale: When someone who works at an organization is arrested or convicted of a crime, the organization needs to know. Under some circumstances, but not all, the organization may automatically receive this information from the authorities. Requiring staff to alert the organization any time such an event has occurred allows the organization and agencies with whom the organization has contracted, to determine whether the staff is suitable for a position of trust with youth.

Best Practices

- k. The organization has a consistently applied process that involves designated individuals trained for reviewing criminal convictions discovered through the criminal background check.

Description: Our organization has a review committee responsible for responding to convictions revealed through criminal background checks, or any other concerns raised during the hiring process. If there is a criminal history, the review committee considers the following:

- a. Seriousness of the crime
- b. Statutes that may legally disqualify the person from working with youth
- c. Length of time since last offense
- d. Pattern of criminal activity
- e. Activities the applicant has been involved in since the offense occurred

Rationale: When a criminal background check reveals a conviction, organizations must have standardized procedures to determine if the candidate is ineligible for hire. An individual with a history of violence, crimes against people, or sexual offenses may be considered too high risk to entrust with the care of youth. Standardized procedures ensure that the same criteria are applied for all applicants when making screening and selection decisions.

11. The organization conducts drug screening for cause.

Description: Our organization reserves the right to require any staff to undergo drug screening at random or based on cause.

Rationale: Alcohol or drug use is involved in more than half of all molestations. Staff who abuse drugs may suffer from impaired judgment and introduce unacceptable risks to youth and to the organization.

Training

Effective abuse-prevention training gives staff the information and skills they need to keep minors safe. Training must be specific, frequent, and useful. It must teach staff how offenders operate; how to recognize suspicious or inappropriate interactions, policy violations, and suspected abuse; and how to respond both ethically and legally.

Minimum Standards

1. The organization has a training delivery system that ensures abuse prevention training is available, completed and documented as required.

Description: Our staff abuse prevention training requirements are written and readily available for review. Content is presented in an educationally sound manner with learning objectives and mastery requirements. All training is documented, and records are kept for each employee. Staff who fail to meet training requirements are subject to our progressive discipline policy.

Rationale: Staff cannot successfully fulfill their performance requirements without consistent, effective training delivered in a timely manner. A written training plan with training requirements and timelines helps keep everyone up to date and the organization's participants safe.

2. The organization requires all staff with access to youth to complete abuse prevention trainings to prepare them for the role of advocate (or other) within the first 30 days of employment, prior to unsupervised contact with youth.

Description: All advocates and other staff in roles where they will have regular access or unsupervised contact with children in DFPS conservatorship receive training in accordance with a training plan and curriculum approved by DFPS. The plan and curriculum shall include the following:

- a. Initial training on working with and understanding the CSEC population,
- b. Mandatory reporter responsibilities,
- c. Establishing appropriate boundaries and engaging in appropriate behavior and communication with CSEC youth, including but not limited to the use of electronic communication and social media and giving and receiving gifts.
- d. Information about sexual, emotional and physical abuse

- e. Types of traffickers and other perpetrators of abuse
- f. How traffickers and other perpetrators of abuse operate
- g. How to prevent false allegations

Staff complete the training and a brief quiz to document mastery, and we document completion of training. Participants also complete a course evaluation. Trainings targeted at other skills and competencies will continue to be provided after this initial 30-day period.

Rationale: Without proper training, staff cannot contribute to the safety of those in their care. Effective training can teach staff to understand their role as protectors; to recognize inappropriate interactions that may foretell abuse; to monitor high-risk activities and locations; and to protect themselves and their coworkers from false allegations of abuse. Training also communicates that the organization has shown due diligence in its attempts to provide the highest levels of care, to prevent further victimization or abuse, and it sends the message, "We will not tolerate any form of abuse in this organization."

3. The organization requires all staff to complete abuse prevention training annually.

Description: Our organization requires staff who work with youth to complete some type of abuse prevention training at least annually. Training can cover a wide range of topics but must contribute to the employee's skills and knowledge related to the prevention of abuse in organizations.

Rationale: Requiring abuse prevention training annually refreshes what staff have previously learned and provides additional knowledge and skills that enhance their ability to protect those in their care. Furthermore, refresher training keeps safety as a top priority for all staff and demonstrates the organization's commitment to preventing abuse.

4. The organization requires all staff or volunteers to complete training in how to respond to suspicious or inappropriate behaviors and/or policy violations.

Description: Our responding training includes each of the following topics:

- a. How to recognize red-flags and boundary violations
- b. High risk circumstances for boundary violations
- c. Steps for how staff or volunteers should respond to boundary violations, suspicious or inappropriate interactions, or policy violations

Participants complete the training and a brief quiz to document mastery, and we document completion of training. Participants also complete a course evaluation.

Rationale: Recognizing and knowing how to respond to suspicious or inappropriate behaviors or policy violations allows staff and volunteers to intervene early and prevent more serious events from occurring.

5. The organization requires all staff to complete training in how to respond to allegations or incidents of abuse.

Description: Our responding training includes each of the following topics:

- Definitions of abuse
- Mandated reporter requirements
- What to do if a youth tells you about abuse (Listen, Reassure, Protect, and Report)

Participants complete the training and a brief quiz to document mastery, and we document completion of training. Participants also complete a course evaluation.

Rationale: Systematic procedures for responding to an allegation or incident of abuse can protect everyone's rights, ensure that the organization responds legally and effectively, and minimize disruption.

6. The organization requires staff who supervise youth to complete training in how to prevent youth-to-youth abuse.

Description: Our preventing youth-to-youth abuse training includes each of the following topics:

- a. Examples of youth-to-youth sexual abuse
- b. Characteristics of youth more likely to act out sexually
- c. Characteristics of youth more likely to be abused
- d. Identifying high risk activities and circumstances
- e. Steps for preventing sexual activity between youth
- f. How to respond to incidents of sexual activity between youth

Participants complete the training and a brief quiz to document mastery, and we document completion of training. Participants also complete a course evaluation.

Rationale: The thought that one youth may sexually abuse another youth does not occur to most staff. Unfortunately, youth complete more than half of all reported molestations and abuse between peers increased significantly in recent years. For staff to prevent youth-to-youth abuse, they must first realize that it occurs, even among very young youth. Then, they must be able to recognize the early warning signs that indicate potentially dangerous circumstances and know exactly the steps to take to prevent an occurrence.

7. The organization provides supervisors with training on effective supervision practices related to abuse risk management.

Description: Our supervisory training includes each of the following topics:

- a. Overview of the supervisor's role in abuse prevention
- b. Supervision strategies that can reduce risk
- c. Using teaching moments in supervision

Participants complete the training and a brief quiz to document mastery, and we document completion of training. Participants also complete a course evaluation.

Rationale: Many incidents of abuse in organizations can be linked to lapses in monitoring of program activities and environments or to inadequate supervision of program participants and staff.

8. The organization requires those who make hiring decisions to complete screening and selection training that includes techniques for screening out potential offenders.

Description: Our screening and selection training includes each of the following topics:

- a. Why screening and selection is important
- b. The limitations of criminal background checks
- c. Managing the organization's screening resources
- d. How to use the application to assess for abuse risk
- e. Behavioral interviewing techniques using questions designed to assess for abuse risk
- f. Standards in reference checking

Participants complete the training and a brief quiz to document mastery, and we document completion of training. Participants also complete a course evaluation.

Rationale: To effectively use the information collected in the screening and selection process, hiring managers and others who make selection decisions must be properly trained. They should know how to use behavioral interviewing methods; characteristics of offenders; and how to recognize warning signs in completed applications, in interviews, from criminal background and sex offender registry checks, and in references. They must also know whether the collected information disqualifies the applicant or requires continued inquiry.

9. The organization requires supervisors who respond to suspicious or inappropriate behaviors or allegations of abuse to complete specialized training.

Description: Our responding training for supervisors includes each of the following topics:

- a. How to recognize red-flags and boundary violations
- b. High risk circumstances for boundary violations
- c. Steps for how staff should respond to boundary violations, suspicious or inappropriate interactions, or policy violations
- d. Creating a culture for responding and reporting
- e. Steps to take when staff report suspicious or inappropriate behaviors

Participants complete the training and a brief quiz to document mastery, and document completion of training. Participants also complete a course evaluation.

Rationale: A poorly executed internal response to inappropriate behaviors or allegations of abuse may jeopardize the safety of a youth, the rights of a staff member, and the stability of the organization. Staff who are responsible for responding to reports of suspicious or inappropriate behaviors or allegations of abuse should be trained in sound investigation practices that yield accurate findings while protecting the rights of everyone involved.

Best Practice

10. The organization uses a variety of methods for maintaining ongoing awareness of abuse risk and prevention.

Description: Our organization uses *just-in-time* training reminders that alert staff just before special events and unique activities; information distributed in our newsletter; brief, spontaneous training by supervisors during program observations; time during regularly scheduled staff meetings; and presentations by guest speakers, to increase skills and awareness, keeping safety foremost in our daily operations. Every week all staff hear something about safety at our organization.

Rationale: Considerable research shows that the effects of training wear off quickly. Repetition and reinforcement work to heighten staff awareness of abuse risk and prevention within the organization. This ongoing process can be maintained through simple yet effective methods such as bulletins, newsletters, email reminders, and safety awards.

Monitoring and Supervision

When staff are adequately supervised, potential offenders are less likely to act on their impulses because they face detection. When youth are adequately supervised, they too are less likely to engage in inappropriate interactions with others. Effective supervision and monitoring require that a variety of methods be used frequently, at both scheduled and random times. Certain Minimum Standards and Best Practices identified in Monitoring and Supervision may not directly apply to your programs.

Minimum Standards

1. Supervisors and administrators use a variety of methods to monitor on-site and off-site programs.

Description: Our supervisors and administrators use scheduled and random observations of all programs, program locations and buildings; engage in spontaneous and scheduled conversations with adults and youth; conduct group and individual supervision and training meetings; and review program documentation, to ensure that safety standards are always in place.

Rationale: By using a variety of supervision methods, supervisors get a more comprehensive and accurate picture of how safely programs are operating, and staff know they will be held accountable.

2. Staff adhere to established methods for supervising and monitoring bathrooms.

Description: We have written procedures for supervising and monitoring bathrooms. Our staff know and follow bathroom procedures. Our bathroom procedures include the following information:

For Group Bathroom Breaks:

- a. Require staff to take groups of two or more youth to the bathroom - following the "rule of three" or more.
- b. If the bathroom only has one stall, only one youth should enter the restroom while the others wait outside with the staff.
- c. If there are multiple stalls, only send in as many youths as there are stalls.
- d. Minimize youth of different ages using the bathroom at the same time.
- e. Require staff to stand outside the bathroom door but remain within earshot.
- f. Prohibit staff from using the bathroom at the same time as youth.
- g. If assisting young youth in the stalls, the staff should keep the door to the stall open.
- h. Ensure staff and advocates know and understand the risks that bathroom times may create for youth to continue recruitment of one another back into a life of trafficking.

For Single Use Restrooms:

- a. Require youth to ask permission to use the bathroom.
- b. Require all staff to frequently check bathrooms.

Rationale: Bathrooms are high risk locations for sexual activity between youth, and adult offenders can use the privacy afforded in bathrooms to offend against a youth. Consequently, bathrooms require close monitoring, and these practices must be carefully managed.

3. Staff adhere to established best practices when transporting youth and other survivors.

Description: Transportation services will be delivered to young adults from time to time. Guardian consent does not apply to transportation of adult survivors. Transportation standards addressing authorized and prohibited destinations, supervisory trip approvals and documentation still apply to adult passengers. Advocates and staff consistently try to meet youth at the visit destination rather than transport them there; however, we have a written procedure governing transporting youth when necessary. Our staff know and follow our transportation procedure. The transportation guidelines include the following information:

General Guidelines:

- a. Advocates never transport youth during the crisis period (initial 72 hours following **each** (repeat) recovery by law enforcement or the **first** identification by law enforcement, or DFPS where a youth is substantially emotionally dysregulated (prior to establishment of a trust-based relationship). Transportation is only to be provided by the youth's legal guardian or those with legal and statutory authority to protect the youth and/or investigate the youth's victimization. Advocates may accompany law enforcement, DFPS or the guardian in that person's vehicle.
- b. To transport youth within the first two weeks of their involvement in the program, staff and advocates must obtain documented supervisory permission.

- l. Require written parental and/or DFPS permission before transporting youth. Consent must be specific to each transportation episode, unless it clearly states the breadth of transportation to be approved (e.g. all trips for the purpose of receiving behavioral and medical healthcare, or all trips to visit with a sibling in out of home placement).
- m. Appropriate times for transporting youth include going to court, medical appointments, forensic interviews, to fulfill case management activities, and relational investment activities with youth (i.e. taking youth to the mall, park, and advocate-youth meet ups, etc.).
- n. Advocates follow all organizational policies during transportation including but not limited to physical interactions, verbal interactions and electronic communication policies.

For transporting youth in personal or agency vehicles:

- a. All requirements regarding transportation agreed to in the MOU between the advocate agency and DFPS are to be followed.
- b. When possible, avoid transporting youth one-on-one.
- c. When possible, include an additional screened and trained staff or volunteer adult or stable youth who is known to the organization in the vehicle to enact the "Rule of 3."
- d. Require staff to document where they transported the youth, including if they made multiple stops to various locations, their mileage, what date and time they picked up and dropped off the youth from transportation services, and the name of youth(s) who were in the vehicle.
- e. Require additional documentation of any unusual occurrences or interactions that may be misinterpreted.
- f. Youth may not be brought to the staff's home or the home of any staff family member.
- g. Supervisors should provide advance approval for any long-distance trips.

For transporting multiple youth in large buses or multi-passenger vans:

- a. Specify adult-to-youth ratios. When possible, do not count the driver in the supervision ratio.
- b. Require staff to have a list of the youth on the trip. The staff take roll when first boarding the bus/van, when exiting the bus/van, periodically throughout the trip, and then again when re-boarding the bus/van.
- c. Require staff to document where they transported the youth, including if they made multiple stops to various locations, and what date and time they picked up and dropped off the youth from transportation services.
- d. Require staff to sit in seats that permit maximum supervision.
- e. Discourage mixed age groups from sitting together. When possible, youth at high-risk of aggression or elopement are to be seated near a staff member.

For transporting youth via public transportation:

- a. Require staff to document where they transported or accompanied youth, including if they made multiple stops to various locations, what mode of transportation was used (public bus, ride-sharing app, train/subway), and date and timeframe they were with youth for duration of transportation services.
- b. Require additional documentation of any unusual occurrences or interactions that may be misinterpreted.

Rationale: Transporting youth may increase the risk of adult-to-youth abuse, youth-to-youth abuse, or false allegations of abuse. While transporting youth may be essential to meet their case management or relation-based needs, the logistics of this activity may create unique opportunities for abuse to occur indicating the need for careful planning and execution to keep all participants safe.

4. The organization adheres to specific procedures for monitoring staff and youth relationships including procedures for monitoring and supervising the amount of time staff spend with youth.

Description: The organization has implemented formal supervision requirements for monitoring relationships between advocates and youth in our programs. Staff know and follow these procedures. Procedures include:

- a. Semi-weekly individual supervision will occur by telephone or in-person. Telephonic supervision can only occur once in any 30-day period.
- b. Supervision must occur within one week of any care coordination team meeting during which a victim assigned to that advocate has been staffed.
- c. Documentation of supervision will record the mode of communication.
- d. All cases assigned to the advocate will be staffed by supervisor and other applicable agency staff monthly or more often as needed.
- e. Supervision will be provided by clinically trained (licensed preferred) personnel with experience in providing trauma-informed care to CST victims.
- f. Advocates will have access to a supervisor or other qualified support 24 hours/day, 7 days/week for consultation and personal well-being.
- g. Requiring supervisors to ensure staff are following the organization's procedures for the minimum and maximum amount of time staff may spend with the youth they serve.
- h. Requiring supervisors to contact youth once a month and their families once a month.
- i. Requiring staff to maintain a weekly log documenting all activity with the youth. This log is reviewed and signed by supervisors bi-monthly at a minimum.
- j. Requiring family members (when applicable) and youth to review and confirm records of contact and activities as reported by the staff.
- k. Requiring supervisors to ask youth questions relevant to the detection of improper conduct or policy violations on a monthly basis.
- l. Requiring that a supervisor meet with youth at the end of the case to discuss their experience with the advocate relationship, including questions related to assessing the youth's sense of safety and care within the program and with the advocate.

Rationale: Such relationships can provide youth with wonderful, supportive experiences but they can also introduce risk because they permit staff to have considerable access to a youth, often out of the sight of others. Additionally, staff conducting excessive visits with youth may mean other red flag behaviors, policy violations or grooming behaviors are taking place. These practices ensure the safety of both staff and youth.

Best Practices

- Staff are easily identifiable when safe and appropriate.

Description: Our staff wear organization attire or photo ID badges that clearly distinguish them as authorized representatives when visiting youth at residential placement, going to appointments with youth, or when they are in other places where being identifiable is necessary. Staff may choose to not wear identifiable attire or badges when meeting with youth in the community or public places.

Rationale: Youth, parents and caregivers, and other stakeholders involved in the youth's case need to be able to identify organization representatives.

- Job descriptions include items related to abuse risk management.

Description: Our job descriptions for positions that allow access to youth include abuse risk management responsibilities.

Rationale: Specifically including abuse risk management requirements in job descriptions communicates the organization's commitment to safety and gives supervisors opportunities to teach and reinforce to staff that safety is part of everyone's job.

- Performance evaluations include items related to abuse risk management.

Description: We include abuse risk management responsibilities as an item on staff performance evaluations.

Rationale: Including items related to abuse risk management in staff performance evaluations communicates the organization's commitment to safety and gives supervisors a way to reinforce to staff the necessity of taking safety seriously.

- The organization systematically identifies where facility architecture may compromise supervision, such as out-of-the-way or isolated locations, and develops methods to minimize and monitor the risks.

Description: Although having youth in the organization's facilities may be rare, the organization must prepare for supervising facilities when the opportunities occurs. We have identified locations in our buildings that may allow unnecessary privacy or limit line of sight supervision. We make staff aware of these locations and circumstances; we emphasize that unused rooms and closets should remain locked; we remind youth of areas they are not allowed to enter; and we frequently and routinely walk through these areas.

Rationale: Out-of-the-way locations, unlocked and unused rooms, rooms without windows, and unoccupied offices may provide opportunities for inappropriate activities between youth or between a youth and a staff member.

9. The organization supervises Internet use in the organization's facilities and programs and with the organization's equipment away from the organization's facility.

Description: Our administrators closely monitor staff's computer and internet use, and we use technological protections such as filtering, firewalls, and encryption.

Rationale: Staff must understand that the organization enforces its internet policy and monitors internet use while staff are on the organization's property. If staff know that their internet use is monitored, they are less likely to break internet policies.

10. Staff adhere to established methods for supervising overnight activities.

Description:

Although overnights may be rare, we have a written procedure governing overnight activities. Our staff know and follow the overnight activity guidelines. Our overnight activity guidelines include the following information:

- a. Require a supervisor's prior approval for all overnight activities.
- b. Require staff to remain awake if youth are awake.
- c. Specify adult-to-youth ratios.
- d. Define narrow geographic boundaries for the overnight activity.
- e. Include a written/structured schedule of events.
- f. Require supervisors to regularly and randomly observe overnights on a scheduled and periodic basis.
- g. Include specific instructions for monitoring overnights away from the facility (such as hotels, residential treatment facilities, homes, etc.).

Rationale: Overnight activities can present unique risks to youth and staff. Overnights may often involve changing clothes; more unstructured and novel activities; and increased opportunities for youth to avoid supervision and for staff to be distracted or seek privacy with youth.

Internal Feedback Systems

Information about program operations can identify high-risk programs or individuals; where increased monitoring, supervision and training, or policy changes may be needed; or even whether a program should be allowed to continue. Complaints from staff, volunteers, or consumers; serious or frequent incidents; and violations noted by external licensing bodies, for example, can be used to identify potential gaps in safety practices.

Minimum Standards

1. The organization provides staff with a grievance procedure.

Description: Staff are told in writing and verbally how to report their concerns or complaints, including observations of others whose interactions may be suspicious or inappropriate, and they are given the names and contact information for at least two levels of personnel they may contact. The procedure is communicated in writing and verbally to all staff, and staff know and can describe the procedure.

Rationale: Staff should be encouraged to report concerns, complaints, or grievances. Their feedback can alert decision makers to potential exposures, including staff who display suspicious or inappropriate behaviors or who violate policies.

2. The organization provides staff with an anonymous method for reporting concerns or complaints.

Description: We have a method in place where staff can report concerns or grievances anonymously. The procedure is communicated in writing and verbally to all staff, and staff know and can describe the procedure.

Rationale: An anonymous method for reporting provides staff who may fear retaliation or who are reluctant to report a colleague or supervisor with a way to inform organization leaders or other decision makers of any concerns or complaints.

3. The organization collects data relevant to the prevention and detection of abuse from a variety of sources.

Description: We collect the following: youth, parent/caregiver, and staff surveys; complaints from all sources; third party standards and potential violations; client service/treatment plans and progress; incident reports, and information regarding internal program quality standard compliance.

Rationale: Youth, parents/caregivers, and staff hold valuable information about program operations. They know how they have been treated, they know about staff conduct, and they know how participants have behaved. Youth surveys are especially important in programs that involve overnight and extended stays because parents/caregivers cannot

communicate with the youth during this time. Incident reports let the organization know about potentially risky situations or programs. Without incident reports, administration cannot monitor what goes on in the programs. With various programs throughout the organization, the organization's internal program quality give administrators a snapshot of what goes on out in the field.

4. The organization compiles and systematically analyzes data so that it may be used to identify increased risk for abuse.

Description: Our organization compiles the information we collect in ways that allow us to look for trends over time or across locations; to identify programs that appear to have increased problems or need additional attention; to inform policies; or to highlight training needs. An overview of this information is shared with the board of directors.

Rationale: Compiling data into a centralized system allows locations and programs to track incidents and recognize trends. In addition, it is beneficial for all locations and programs to know what types of incidents and behaviors occur across all locations and which are location specific. Sharing data allows programs to learn from one another.

Best Practices

5. Methods to report concerns, complaints, or grievances are widely publicized.

Description: All staff are informed at hire and repeatedly thereafter of the importance of reporting concerns, and the various options they have to report their concerns.

Rationale: Staff should be encouraged to report concerns, complaints, or grievances. Their feedback can alert decision makers to potential exposures, including individuals who display suspicious or inappropriate behaviors or who violate policies.

6. The steps the organization takes in response to a concern, complaint, or grievance are in writing and available to staff, volunteers, parents and youth.

Description: The steps we follow in response to a concern, complaint, or grievance are in writing and widely distributed. Staff know and can describe the procedure.

Rationale: The more comfortable staff, parents, and youth feel about reporting their observations or concerns early on, the more rapidly administrators can investigate and act. If staff believe their concerns will not be taken seriously, not be treated confidentially, or that administration will overreact, they will be less likely to report. Therefore, the organization needs to explain how administrators will respond to concerns, complaints, and grievances in order to encourage reporting.

Consumer Participation

Educated consumers - both clients and interested others - can contribute to overall safety. But to do so, they must know the program's policies and how to respond if they notice policy violations or interactions that make them uncomfortable. Encouraging consumers to share their concerns, and periodically surveying them about their experiences, provides useful information about program operations.

Minimum Standards

1. The organization provides youth with age and developmentally appropriate information about protecting themselves from abuse.

Description: Our organization provides information to youth about proper boundaries between adults and youth, including organization policies about interactions between staff and youth, and the steps youth can take if someone tries to break the rules or violate their boundaries.

Rationale: Youth can contribute to their own safety if they know what is acceptable and what to expect from staff and other youth. If violations occur, they can spot them and let responsible adults know.

2. The organization provides youth with a grievance procedure for reporting any concerns.

Description: Our organization provides youth with several ways to report their concerns. We give each youth the names and contact information for two persons they may speak with; they can talk privately with any staff directly; or they may anonymously express their concerns by phone or by depositing a note in our suggestion box. We have established procedures for responding to any concerns.

Rationale: A grievance procedure empowers youth to report unacceptable interactions between staff and youth or between youth and allows the organization to promptly take appropriate action.

Best Practices

3. The organization provides parents and caregivers with information about how to protect their youth from further abuse and exploitation.

Description: We provide parents and caregivers with information about how to protect their youth from further abuse and exploitation both within and outside of the organization's programs to prevent revictimization; the organization's policies related to interactions between staff and youth and between youth; how to recognize warning signs of abuse and exploitation; and how to respond to their youth if they suspect further abuse or exploitation.



Rationale: By providing parents and caregivers with information about how to keep their youth safe from further abuse and exploitation, organizations enlist them as informal members of the risk management team. Parents and caregivers can recognize interactions that may be inappropriate or that put their youth at additional and greater risk of harm.

4. The organization encourages parents and caregivers to engage with the youth's program participation.

Description: Our organization invites parents and caregivers when they join the organization, or when their youth participates in an organization program, to observe and learn about the program their youth is engaged with.

Rationale: When parents and caregivers are involved with programming, they come away knowing how staff interact with and treat their youth, and staff know that their interactions are supervised by another additional party. If parents see something of concern, they can bring it to the attention of program supervisors for appropriate action to occur.

5. The organization provides parents and caregivers with a grievance procedure.

Description: Our organization provides parents and caregivers with several ways to report their concerns. They are given the names and contact information for two senior staff, they can talk privately with any staff directly, or they can anonymously express their concerns by phone or by depositing a note in the suggestion box. We have established procedures for responding to any concerns.

Rationale: A grievance procedure empowers parents and caregivers to report unacceptable interactions between staff and youth or between youth and allows the organization to promptly take the appropriate steps.

Responding

How a program responds to suspicious or inappropriate interactions, policy violations, and incidents or allegations of abuse can dramatically affect the harm to the individuals involved and the damage to the program. Once a staff, volunteer, youth, parent/caregiver, or CCT partner agency has expressed a concern or made an allegation about the treatment of a minor, swift and determined action must be taken to reduce any subsequent risk to the minor, to the accused staff or volunteer, and to the program. Programs must establish precise, unequivocal requirements for reporting to the authorities and for adhering to a serious-incident response plan.

Minimum Standards

1. The organization has a written procedure outlining the appropriate staff response to reports of red-flag or inappropriate behaviors and/or policy violations.

Description: We have a written procedure that describes what constitutes red-flag or inappropriate behaviors or policy violations; what steps should be followed if an incident occurs; who should be notified, including a supervisor; and what information should be recorded. The procedure is communicated in writing and verbally to all staff, and staff know and can describe the procedure.

Rationale: Because red-flag or inappropriate behaviors or policy violations often precede incidents of abuse, a swift and consistent response can interrupt potential inappropriate events and help protect youth from abuse and staff from false allegations of abuse.

2. The organization has a written procedure outlining the appropriate staff response to allegations or incidents of abuse.

Description: We have a written procedure that describes what constitutes an allegation or incident of abuse; what steps should be followed if an incident occurs; who should be notified; how and when they should be notified; and what information should be recorded. Our procedures comply with all state-mandated reporting requirements and contractual reporting obligations. The procedure is communicated in writing and verbally to all staff, and staff know and can describe the procedure.

Rationale: This procedure helps to ensure that all reports or allegations of suspected abuse are managed correctly and legally and protect the rights and reputations of everyone involved and the organization.

3. The organization has a written procedure outlining the appropriate staff response to knowledge of or receipt of inappropriate or illegal digital images and videos, including child pornography of known or unknown victims.

Description: We have a written policy that outlines steps for responding to potential knowledge of or receipt of inappropriate or illegal digital images and videos that keeps both staff and youth safe. If staff receive or gain knowledge or observation of illicit messages, pictures, or videos of youth from youth served or other community members, the following steps should occur:

- a. Do not forward or share the message(s) or image(s) with others including co-workers, supervisors, the youth's guardian or caretaker. Do not take screenshots of any images, videos, or illicit conversations, even in attempts to maintain documentation or evidence.
- b. Within 60 minutes, staff should immediately contact their supervisor to report the knowledge of or receipt of message or images and consult on reporting steps and appropriate stakeholder contact information.
- c. Staff should report to the CPS Hotline details about messages or images containing children including those in conservatorship of DFPS within 24 hours.
- d. Staff should also report directly to the Law Enforcement representative assigned to the victim or the trafficking investigation within 1-2 hours from first discovery, unless staff continues to be with child during that timeframe.

- e. If feasible, immediately turn off the phone or device with illicit images and turn over to police
- f. Follow all internal documentation requirements, including recording date, time, facts, names of social media profile or accounts, telephone numbers, other implicated information as necessary.
- g. For youth engaged in care coordination, information without detail is to be provided to the care coordinator, or to investigative partners, prior to or at the next scheduled care coordination team meeting or investigative multi-disciplinary team (MDT) to assist with service planning.

Rationale: Due to the nature of experiences the youth are facing, the organization must be prepared to respond to any knowledge of or receipt of illicit messages, pictures or videos either from youth or other individuals in the community.

- 4. The organization has a written procedure outlining the appropriate staff response to youth-to-youth sexual activity.

Description: We have a written procedure that describes what constitutes youth-to-youth sexual behaviors; who should be notified if an incident occurs, including a supervisor; how and when they should be notified; what information should be recorded; and how the youth involved will be managed to prevent further occurrences. Our procedures comply with all state-mandated reporting requirements and contractual reporting obligations. The procedure is communicated in writing and verbally to all staff, and staff know and can describe the procedure.

Rationale: Advocates may not know how to respond (or even if they should respond) to youth-to-youth sexual activity. Therefore, the organization must provide staff with specific procedures to follow in order to protect all parties involved.

- 5. The organization has a written procedure outlining the appropriate supervisor and administrator response to reports of red-flag or inappropriate behaviors and/or policy violations.

Description: We have a written procedure that describes the steps supervisors must follow in response to a report of red-flag or inappropriate behaviors and/or policy violations. The procedure includes the use of a tiered progressive discipline process that allows decision makers to use a range of responses, including termination, depending on the severity of the unacceptable behavior and/or policy violation. The procedure also includes specific documentation requirements. The procedure is communicated in writing and verbally to all supervisors and administrators, and supervisors and administrators know and can describe the procedure.

Rationale: Because red-flag or inappropriate behaviors and/or policy violations often precede incidents of abuse, a swift and consistent response can interrupt potential untoward events and help protect youth from abuse and staff from false allegations of abuse. One barrier to maintaining safe environments is when supervisors don't know how

to respond to unacceptable behavior or policy violations, or when they think the only disciplinary action, they can take is to fire someone. A detailed progressive disciplinary procedure provides supervisors and administrators with a range of options for responding to policy violations or unacceptable conduct, short of terminating the offender.

6. The organization has a written procedure outlining the appropriate supervisor and administrator or response to allegations or incidents of abuse.

Description: We have a written procedure that describes the steps supervisors and administrators must follow in response to an allegation or incident of abuse. The procedure includes mandated reporting requirements, who within the organization must be notified, suspending the accused pending an internal review and an external investigation of the circumstances surrounding the allegation or incident of abuse, and what documentation is required. The procedure is communicated in writing and verbally to all supervisors and administrators, and supervisors and administrators know and can describe the procedure.

Rationale: An allegation of abuse can grind an organization to a halt. Systematic procedures for responding to an allegation of abuse can protect everyone's rights, ensure that the organization responds legally and effectively, and minimize disruption.

7. The organization has a written procedure that includes suspending the accused pending an internal review and an external investigation of the circumstances surrounding the allegation or incident of abuse.

Description: Our policy requires that, in addition to reporting the allegation to the authorities, anyone accused of abuse be removed from access to youth in our care. Information about the situation will be treated confidentially and shared only on a need-to-know basis. The procedure is communicated in writing and verbally to all supervisors and administrators, and supervisors and administrators know and can describe the procedure.

Rationale: To protect the youth, the organization, and the accused, the accused individual must be removed from contact with youth pending an internal review and an external investigation of the allegation.

8. The organization has a written procedure outlining the appropriate supervisor and administrator response to youth-to-youth sexual activity.

Description: We have a written procedure that describes the steps supervisors must follow in response to a report of youth-to-youth sexual activity. The procedure includes mandated reporting requirements, who within the organization must be notified, what documentation is required, and how the youth involved must be managed to prevent further occurrences. The procedure is communicated in writing and verbally to all supervisors and administrators, and supervisors and administrators know and can describe the procedure.

Rationale: The frequency of youth engaging in sexual activity with other youth is cause for concern. When an incident occurs, unsuspecting administrators may be caught off guard or unprepared to properly manage the situation. Youth may be hurt, parents may be alarmed or angry, and even the legal authorities or the media may be involved. Outlining in advance the proper steps to follow can help to ensure a thoughtful and correct response.

9. The organization has a formalized procedure for reviewing an incident to prevent reoccurrence.

Description: If an incident occurs, staff and administrators carefully review the circumstances, consider whether the incident was isolated or recurring, and whether the youth involved pose a risk to the safety of others in the program. The procedure is communicated in writing and verbally to all staff and administrators, and staff and administrators know and can describe the procedure.

Rationale: Certainly, every effort should be made to serve youth already participating in programs. However, not all programs can meet the needs of all youth. When the demands placed on staff by youth exceed the skills of the staff or the scope of the program, accidents or abuse may occur. When youth present a danger to others, their continued participation in the organization can expose the entire program to financial liability.

Best Practices

10. The organization has a critical-incident management plan.

Description: We have a comprehensive critical-incident management plan that delineates what events trigger a critical-incident response; who manages the plan implementation, including a back-up person; who is notified and by whom; and what steps occur in which order for which type of critical-incident. The plan is updated annually, easily accessible, and known by senior leadership and board members.

Rationale: The time to decide how to respond to a critical incident is not in the middle of a crisis, when alarm and chaos may interfere with good judgment and decision making. By developing a critical-incident management plan, if an incident occurs, the organization will know exactly what to do to respond appropriately.

Administrative Practices

This operation addresses the overall organizational response to the risk of abuse, the responsibilities of the board of directors; practices to inform leadership of the risks the program is embracing; and the extent to which best practices are consistently in place across all locations.

Minimum Standards

1. The organization identifies a point person to coordinate all abuse prevention efforts.

Description: Our organization has an identified "go to" person who is immediately informed and subsequently kept in the loop about any issues related to the prevention of sexual abuse in our programs, and about responses to abuse-related issues. This person regularly participates in training to stay current with best practices.

Rationale: Ensuring safety requires the coordinated efforts of many different operations in an organization: human resources, training, program management, finance, risk management, CEO, COO, and the board of directors. It also requires specialized expertise. By designating a key person to shoulder this responsibility, accountability can be established, barriers that might exist between operations can be removed, and necessary training can be provided.

2. The board of directors receives information and training regarding the organization's commitment to preventing abuse in its programs.

Description: Our board of directors routinely receives information relevant to all we do in preventing abuse in our programs, and we periodically make training opportunities available to them.

Rationale: Board members play a key leadership role keeping an organization safe. But to do this, they must understand how the actions of one person can hurt a youth for a lifetime and financially ruin an organization, as well as the steps that can be taken to ensure everyone's safety. They also must understand that effective risk management requires a commitment of time, expertise, and financial support.

3. The board of directors routinely receives organizational data in a way that permits analysis and utilization for abuse risk management.

Description: Our board of directors receives regular updates about issues related to abuse risk management, such as consumer complaints, licensing standards violations, changes in programs that may impact risk, and so on.

Rationale: When front-line supervisors make important risk management decisions, the best interests of the entire organization may not be adequately considered. For example, a manager charged with increasing the number of youths served in a program may assume greater levels of risk to meet this goal. The governing body must establish policies, receive

and respond to risk management organizational data, and commit the resources necessary to run safe and effective programs.

4. The board of directors is promptly informed of any allegation of abuse.

Description: We immediately inform the designated board representatives about any incident or allegation of abuse and keep them informed as the situation is investigated.

Rationale: The board of directors should be immediately alerted to any allegation of abuse, so it can ensure that the organization conducts a prompt and thorough response, and so board members are prepared to respond to inquiries from community representatives.

5. All organization programs meet or exceed all applicable third-party and contractual requirements.

Description: All our programs that are subject to external third-party and contractual standards meet all these standards and remain in good standing.

Rationale: Programs subject to external third-party and contractual standards are obligated to comply with those standards to stay in business, avoid fines, and ensure safety. Organization visits by experienced third-party representatives provide an opportunity for the program to receive feedback from a knowledgeable, outside source.

6. The organization has established criteria approved by counsel to determine when a contract with collaborators, partners or vendors is necessary and the items to be included.

Description: As a condition of collaboration of any type with other organizations, we routinely consider potential risks and exposures and work with counsel to assess what terms and protections need to be specified contractually. We consider indemnification and insurance requirements. Our organization also provides collaborators and contractors with information about our commitment to preventing abuse within the organization.

Rationale: Sharing physical plants or staff resources can benefit everyone. However, sharing may also inadvertently introduce unnecessary risks. For example, if an organization loans a staff member to another organization, and the behavior of the staff causes a claim, which organization is responsible for the claim? Similarly, if a youth from a contractor program is injured on the physical plant of the host organization due to negligent supervision, who is responsible? Signed contractual agreements clarify responsibilities and help to protect both organizations.

7. The organization monitors compliance with operational standards.

Description: Administrators and supervisors monitor various sources of information including incident reports; reports from staff, youth, and parents; reports from outside auditors; and use direct observation to ensure compliance with organization best practices

and those standards imposed by licensing or accrediting bodies or contractual relationships.

Rationale: The organization creates operational best practices or agrees to comply with operational best practices imposed by funding sources or partnerships and therefore understands the rationales behind the best practices. As the legally responsible party, the headquarters is obliged to monitor and ensure compliance with applicable best practices and licensing standards.

Best Practices

8. The board of directors has a standing committee charged with abuse risk management.

Description: Our board of directors has assigned abuse risk management to a standing committee of the board. The committee meets regularly and reviews any issues related to potential exposures, pending incidents or litigation, media involvement, prevention efforts, and insurance coverage.

Rationale: The ultimate responsibility for safety in an organization rests with its governing body. Decisions regarding the degree of risk assumed by an organization and how these risks are managed should be made by the primary stake holders, who understand the "big picture."

9. The organization's senior leadership has established relationships with key community officials so that in a time of need they are accessible, responsive, and supportive.

Description: Our organization has established relationships with the local media, child protective services, the child advocacy center, and the sex crimes division of the governing police departments.

Rationale: Forming relationships with key community representatives educates them about the contributions the organization makes to the community and makes them valuable resources during a time of need.

10. The organization has a procedure for responding to media requests about allegations or incidents of abuse.

Description: Our organization has a designated media spokesperson and prohibits all others from communicating with the media. Staff know the designated spokesperson by name and have been instructed and reminded to refer all media inquiries to this person.

Rationale: Coordinating all media contact through a designated spokesperson ensures that the organization disseminates only accurate information. Particularly in the event of a serious incident, inexperienced staff may disclose confidential information, answer

questions inaccurately, or fall prey to misleading questions.

11. The organization has a written procedure for selecting and approving new programs and ensures staff stay within the bandwidth of acceptable program activities when serving youth.

Description: No new program can be started without a written request that specifies the need for the program, the benefit to the organization and youth, financial viability, what risks the program embraces and how they will be safely managed.

Rationale: New programs often introduce new risks. Addressing potential risks prior to program adoption and implementation ensures that staff are prepared to monitor programs adequately and that youth will be safe.

12. Deviations from best practices are addressed with the responsible supervisor and corrected.

Description: We complete routine program observations and inspections at scheduled intervals, at random times, and in response to complaints. If operational gaps or shortcomings are detected, a corrective action plan is prepared, and the responsible supervisor is charged with correcting deficiencies.

Rationale: Routine observations and inspections help to hold responsible supervisors accountable for meeting all operational requirements.

Child Sex Trafficking Advocate Program Minimum Standards and Best Practices for Service Quality and Operational Effectiveness

Culture of Collaboration and Helpfulness

Advocates are most effective when they strive to meet the needs of survivors, families of survivors and other professional partners responding to the exploited individual youth. This starts with the advocate agency leadership establishing a culture where all staff and other agency representatives feel responsible to be helpful, even when inconvenient or the path remains unclear. That culture also requires collaboration with partners at a deeper level than they've previously experienced, building trust with other stakeholders and understanding those partner's objectives sufficiently so that advocate agency staff can help to achieve them.

1. The organization has policies and procedures that communicate an eagerness to be helpful starting with every referral, initial contact, and/or initial engagement and continuing through service delivery with all stakeholders. These practices are evident with survivors and their families, guardians and other caregivers, care coordination team partners, community and system stakeholders, and referring parties (Partners).

Description: Board of Directors and organizational leadership promotes policies that include:

- a. The expectation that the community will need to be initially and repeatedly educated to understand the role of the commercially sexually exploited youth (CSEY) advocate (advocate) including responsibilities, limitations, training and support and engagement with the CCT and other Partners,
- b. **No wrong door** – Those seeking assistance from the organization are provided with help, especially when they are ineligible for advocate services or are seeking something outside of the organization's scope,
- c. *When referring someone, a warm handoff* to others is offered whenever possible,
- d. **Starting with Yes** – Balancing the limitations of their role with being resourceful, including seeking help from others as needed,
- e. Being consistent and predictably reliable, but flexible as needs arise,
- f. Active collaboration in support of Partners' objectives should be evident in every response,
- g. The assumption of good intentions from Partners.

Rationale: Survivors and their families or caregivers may have had difficult or unproductive contact with service providers. This may include failed attempts to navigate criminal justice and service systems. Initial responses from advocate organizations that are not immediately helpful or provide value may exacerbate levels of isolation and stress and increase the difficulty of forging an alliance. Professional stakeholders may not fully understand the scope, boundaries and role of the advocate and may be quick to generalize an insufficient or not clearly collaborative response to the value of all advocate functions.

2. The organization ensures that advocate planning and service delivery reflect full coordination and collaboration with law enforcement, child welfare and juvenile justice partners. In communities where the care coordinator and related care coordination team (CCT) and/or multi-disciplinary team (MDT) are operating, clear expectations for this collaboration will be established by local consensus protocols. The CCT is focused on improving the combined effectiveness of all responders to CSEY victims. Urgent staffings of individual victims may be carried out by first-responders from the CCT. The MDT will occur after sufficient information has been collected to focus on investigative and service coordination for one victim at a time. These two names, CCT and MDT, may be used to mean the same thing in many communities. Unfettered coordination ensures the most effective and efficient outcomes for the survivor and where appropriate, support the objectives of partners involved with both of these platforms.

Description: Advocates exemplify both the spirit and letter of the local consensus protocols where established, seeking opportunities to inform and seek input from CCT/MDT partners in planning and implementation of advocate services for each CSEY survivor and regular reporting of service activities to those partners.

- a. Case management activities directed at placement change and/or geographic relocation solicit care coordinator and applicable CCT/MDT members for input in advance of reaching final decisions,
- b. **Best Practice** – Care coordinator is notified by advocate as soon as the need for placement change and/or relocation has been communicated to the advocate, creating an opportunity for stakeholders to contribute timely and salient information towards the decision,
- c. Advocate documentation includes a record of all contact with the care coordinator and CCT/MDT. Contact may be written in narrative, checkbox or other form. Requirements for content has been determined by the advocate organization and where present, established by consensus protocols,
- d. **Best Practice** – Documentation of care coordinator and/or CCT/MDT contact is recorded on a searchable database,
- e. Reports of contact by advocate with survivor are provided monthly to care coordinator and, for foster children, to the Department of Family and Protective Services (DFPS). This report may be in any form,
- f. **Best Practice** – Reports of contact by advocate with survivor to the care coordinator and DFPS are provided in writing.

Rationale: The healthy trauma bond between advocates and survivors often results in a level of trust and intimacy that is unduplicated with many other stakeholders, as advocates meet numerous emotional/relationship support and basic case management needs. Information, including decisions to relocate the survivor out of placement or the community, known to the advocate, could have a profound effect on plans and decisions made by other agencies, but only if that information is conveyed, and input from the care coordinator and others is solicited, in a timely manner. CCT/MDT meetings will not occur frequently enough to communicate advocate updates, so CCT/MDT members will need to trust that the advocates are adequately communicating and consulting between those meetings and not working independently or at a shallow level of coordination. Periodic transparent reporting of communication activities will help to convey that.

Family Consent and Engagement

The organization must have clear instructions for how advocates will determine if they are able to engage with a survivor and/or their family. This may vary from community to community, based on partnerships with law enforcement, DFPS, and emergency medical staff, or be applied universally across communities by the advocate organization's leadership. The crisis period of up to 72 hours after law enforcement has recovered a youth can be a critical window of opportunity to support law enforcement's immediate need to provide care for the victim and to begin to establish a supportive, trust-based relationship with them. In collaboration with investigative partners, simultaneous pursuit of guardian consent must occur to keep all parties safe, and later, to establish a relationship with protective family members.

1. The organization has policies and procedures that direct how advocates engage with the survivor's biological or kinship family. These illustrate initial and on-going contact relative to investigative organizations, legal consent, emotional and physical safety, use of accessible information and separation of roles.

Description: Board of Directors and organization leaders adopt policies which provide and supervise the application of procedures that direct eligibility for the manner in which advocates engage with parents and other caregivers: Evidence that the following issues were addressed will be found in Board approved policies, operational procedures, training plans, advocate case notes and supervision.

- a. Eligibility to engage relies upon direction from staff of law enforcement and/or child welfare investigative agencies. This information may be communicated to the advocate by the care coordinator agency,
- b. Assessment to engage considers survivor's perspective,
- c. Guardian consent **should** be pursued when no investigative agency is actively responsible for the welfare of the child or if actively involved, if that agency does not direct the advocate to abstain from seeking consent when asked,
- d. **Best Practice** – When an investigative agency is engaged, but has not made a determination regarding family members, the engagement decision will be made in consultation with the investigative agencies known to the advocate at the time. The advocate documents this consultation,
- e. To provide informed consent, the advocate will discuss with the guardian that the advocate may share information with the CCT that has been acquired through contact with the survivor or family members, for the purpose of service planning and coordination, and law enforcement or child welfare investigative activities,
- f. Advocate identifies extent of engagement authorized before determining the appropriate short-term service plan,
- g. Advocates may have initial contact with family members, but the same advocate does not automatically provide continuing advocate services to both family members and the survivor. Justification for serving the needs of the family member must meet the following criteria:

- i. Be assessed and approved by advocate’s supervisor and the advocate agency’s case review/staffing process,
 - ii. Reflect an absence of alternate resources in the community to meet this need,
 - iii. Documented support for, and not detract from services provided to, or outcomes achieved by the survivor,
 - iv. **Best Practice** – Initial and periodic assessment and approval for the advocate to deliver services to family members will be provided by the CCT/MDT where care coordination is operating.
 - v. When seeking consent, the advocate explains the distinction between family advocate and survivor advocate roles to the survivor and family. This includes protecting the confidentiality of any information shared by either, unless the advocate is provided with explicit consent to share that information with the other (survivor or family member).
 - h. Initial consent provided by the guardian includes authorization for:
 - i. the advocate to engage in services with the survivor and,
 - ii. information sharing between family and survivor advocates, including those advocates providing services from other organizations,
 - i. The family advocate, from (which due to community resource allocations, might be provided by) the CSEY advocate organization, the children’s advocacy center (CAC), or another organization, has regular contact with the family, seeking to address their continuing needs separately from those of the survivor,
 - j. The family is provided with a clear understanding of the role and responsibilities that the survivor advocate plays with the survivor and family advocate plays with the family and the family is provided with their own hard copy of this information,
 - k. **Best Practice** – This survivor and family advocate role clarification conversation with family occurs in person,
2. **Best Practice** – Operating procedures reflect agreements in place with other organizations providing supportive services which may include, but not be limited to those providing family advocacy,
- a. Agreements will include identification of responsibilities and boundaries for each advocate and how the two advocates will communicate and as appropriate, collaborate care,
 - b. Support groups for family members and other caregivers should be provided by other community agencies. When those resources are not available, advocate agencies may choose to provide these. Advocates may provide assistance with coordination, transportation or other forms of support, but to maintain proper boundaries and protect the survivor’s confidentiality, they should not facilitate, participate in, or attend these.

Rationale: Initial and on-going engagement with protective family members and caregivers can provide important and valuable input towards the survivor’s well-being, but so much information about that familial relationship may be unknown at the time that the youth has been recovered. Advocates must rely upon investigative or care coordination agency partners, where engaged, to provide direction that protects the survivor and advocate’s physical and emotional safety, the integrity of the investigation, and the immediate stability of the child. On-Going engagement with protective family members should reflect strong collaborative relationships with other advocates in the community where possible, to protect the sanctity of each advocate relationship and the needs of all those affected by this victimization.

Survivor-Centered

A primary characteristic of the substantial trauma that survivors of the commercially sexually exploited youth (CSEY) have experienced is a loss of agency over their lives. Survivors will cycle between the Stages of Change, indicating needs for the advocate to meet that may vary substantially from day to day. Advocate organizations must individualize services based on the survivor’s readiness to make change at each point of contact and to do so in a manner that empowers them. All services must be provided in a trauma-responsive manner, whether the survivor seems to be progressing towards, or regressing from positive change.

1. Being victim-centered is embraced and evidence for this is found throughout the organization, including connecting with community resources that will eventually help the survivor to transition away from dependence on the advocate organization.

Description: The advocate must plan and implement services in collaboration with the survivor, who is always the expert on what they are currently experiencing. Services will be developed with, rather than *for* the survivor and need to reflect not only where they have been and where they are at that time, but also where they want to go. Following are some examples of how this is exemplified by the organization:

- a. Board of Directors’ policies and operational procedures indicate that advocate services are delivered in the field or community. Office-Based advocate services are not promoted in these documents or marketing and outreach materials,
- b. Language found in promotional material, outreach collaterals, operational procedures and service plans reflect meeting survivors *where they are*, both geographically and emotionally. Case management goals and activities illustrate this alignment as well,
- c. **Best Practice** – Resources from the local community and/or the community where the survivor wants to go to are drawn upon to assist with their transition. MOU’s or other agreements with allied professional or volunteer organizations are in place to assist with peer support groups or the CSEY advocate.

Rationale: Advocates for survivors of CSEY form the connection between the systems of care and other responses to their trafficking victimization (e.g. law enforcement). This connection is built upon planned case management that gets basic and advanced needs met, as well as the trust-based relationship that conveys the commitment to assist the dysregulated survivor during times of crisis when they are unable to emotionally regulate themselves. The survivor may have experienced a loss of, or never had natural support systems such as protective family and friends that could help them with this. Even when they’ve experienced stability and are maintaining positive change in their life, the survivor may be vulnerable to triggers that elevate their risk for destructive decisions. To counter these risks, the survivor needs to establish healthy relationships outside of the advocate organization that can be their support system during and after transitioning out of advocate services.

2. To be survivor-centered and ultimately effective, all services, including case management for CSEY survivors must reflect the principles of the Stages of Change Model (SoC) (Prochaska and DiClemente) and implementation strategies inherent in Motivational Interviewing (MI) (Miller and Rollnick). The organization demonstrates these principles and practices in policies and procedures concerning all staff and volunteers.

Description: Board of Directors and organization leaders adopt policies and procedures that direct the selection, hiring, training and supervision of employees, contractors, and volunteers in a manner that reflects those SoC and MI principles and practices. Indications of this will include, but not be limited to:

- a. Organizations will use accepted standardized assessments in their screening and selection of applicants for advocate positions, as an adjunct to other techniques, to find qualities that will align with these principles and practices,
- b. Applicants for employment, contract and volunteer positions do not have to have educational training in these models, but should exhibit value for survivor-centered and trauma-informed services,
- c. Applicants hired for direct service roles (case management and emotional/relationship support) should have training in, and/or prior experience with survivor-centered and trauma-informed services,
- d. New employee and volunteer orientation will include training in SoC and MI. Those in direct service roles will have a minimum of four (4) hours of training, **prior to contact** with any survivors. This pre-service training does not count towards annual training requirements,
- e. Employees in direct service roles will have a minimum of eight (8) hours of training each year from a MI subject matter expert. Documentation of that expertise is maintained on file. This training will include methods to apply MI to, and assess accuracy relative to MI stages, for case management planning and implementation,
- f. Supervisors will be trained in the use and supervision of MI,
- g. Supervision and case notes will reflect the application of terminology attributed to these models and regular assessments of the survivor's readiness for change,
- h. Documentation includes the use of templates, checklists and other tools to determine the effectiveness of strategies to support healthy transitions between stages,
- i. **Best Practice** – Case management and emotional/relationship support functions are carried out by the same individual. Support for case management is provided by colleagues, but effectiveness of that activity by the same individual benefits from the continued nurturing of that emotional/relationship support role.

Rationale: Survivors' readiness for change needs to drive case management (as well as advocate emotional/relationship support) planning and implementation. Survivors of CSEY are frequently distrustful of others in positions to plan and carry out case management. They may become engaged with multiple systems, including juvenile justice, child welfare and healthcare, which creates confusing opportunities and challenges. Survivors may not identify with being exploited or haven't considered options available to make changes. When they contemplate and then commit to those options, they often experience ambivalence about the difficult choices that lie

ahead. This results in cycling between SoC stages. This dynamic undermines traditional case management activities but can be handled effectively if those are carried out in the context of this framework.

Case Management

Advocates will demonstrate their healthy, trust-based relationship with their commercially sexually exploited youth (CSEY) survivor in many ways. Advocating for them through active and assertive case management may be one of the significant ones. Case management that is provided by individuals with a clear understanding of the unique needs of these survivors, the multiple systems in which they must engage and the many barriers that exist that prevent easy access to services and resources can be invaluable. In addition to serving the needs of survivors, case management may help collaborating partners to achieve their objectives as well.

1. The organization clearly communicates that advocate services bring value to **all stakeholders** through the offer and execution of specialized and long-term case management.

Description: Advocates offer supplemental case management, in the presence of other system case management operating on behalf of the survivor and their family. In the absence of system/service/investigation case management, advocates may assume this role on their own. In both scenarios:

- a. Advocates offer case management in collaboration with on-going system (e.g. DFPS, juvenile probation (JP)), and service- or investigation-based (e.g. hospital or law enforcement victim services counselor) case management, continuing case management beyond others' eligibility parameters. These case management types may be conditional or available only while the youth is under court order (e.g. DFPS, JP), while other services are being provided (e.g. medical care) or while a law enforcement investigation is open. In contrast, CSEY advocates may continue to provide services for extended periods of time, without regard to outside conditions such as these.,
- b. Survivors and their families participate in setting priorities, developing and planning for case management activities,
- c. Advocates immediately identify other known or potential providers of case management to clarify the CSEY advocate's and other case manager's roles, determine existing and projected needs, progress and ways in which to collaborate,
- d. Although they are facilitating case staffing activities, case management is not the responsibility of the care coordinator, although they may aid in identifying and accessing resources for the advocate,
- e. Advocates familiarize themselves sufficiently with case management functions of other organizations to collaborate and not undermine or duplicate them; recognize when to reach out to them for assistance; and express support and appreciation about that other organization to the survivor for their work,
- f. **Best Practice** – Organizations prepare scripts for use by advocates, to tout the collaborative work of other organization's case management.

Rationale: The complex trauma and multi-system engagement experienced by these survivors results in complicated and long-term case management needs. Coordinating efforts of all engaged case managers will enhance their individual and overall effectiveness.

2. Case management will be carried out in a manner that conveys the attributes of successful advocacy support. It will be relationship-based, trauma-responsive and survivor-centered.

Description: Survivors should experience no difference in connectedness with, and support from representatives of the advocate agency when either case management or relationship-driven advocacy is being carried out. Both activities will reflect responsiveness to the survivor's emotional, physical and legal/guardianship status. This is exemplified when:

- a. All organization representatives responsible for identifying and/or responding to the survivor's needs carry out trauma-informed connecting activities with the survivor,
- b. Organization provide training to direct service personnel (advocacy and case management services) and supervisors related to assessing the survivor's status and the need to weight or balance these services,
- c. Documentation of case management and other advocate support activities indicate awareness, alignment and achievement between each of those functions when delivered by different advocate organization representatives,
- d. Depth or intensity of engagement, including frequency and type of contact, and case management and support objectives pursued with survivor illustrates alignment between emotional/relationship support and case management,
- e. Supervision of advocate organization personnel includes opportunities for expressions by those personnel of a lack of coordination, frustration, and/or misalignment with colleagues' work,
- f. At scheduled intervals during service delivery, organization surveys survivors for their satisfaction with the balance achieved between delivery of case management and emotional/relationship support activities,
- g. At scheduled intervals during service delivery, organization surveys primary stakeholders (e.g. guardian, DFPS caseworker, criminal justice representative, care coordinator) for their satisfaction with the balance achieved between delivery of case management and emotional/relationship support activities,
- h. Satisfaction surveys are utilized in a manner and form that promote candid and transparent feedback. Organization reflects the use of survey feedback in employee supervision and organizational operations,
- i. **Best Practice** – Survivors and stakeholders are provided with a mechanism to provide feedback regarding satisfaction on their own impetus, as experience with the advocate agency unfolds.

Rationale: Advocacy for the CSEY survivor is not limited to meeting the survivor's basic and emotional needs but must include case management activities when resources for this may not be available. Assigned Child Protective Services (CPS) staff may fulfill this role sufficiently when a youth is in foster care, or that staff may seek assistance from the advocate agency for a special need related to CSEY victimization. Case management may be provided on a short-term basis by a juvenile justice court, probation officer, law enforcement victim counselor, medical social worker, or community service provider. In these circumstances, the advocate organization case management may overlay and/or extend these services beyond the time or scope during which

others may be able to deliver services. These and other stakeholders should understand and come to value that the advocate relationship is not limited to establishing a safe and healthy relationship with the survivor; it also includes the appropriately balanced planning and implementation of both services.

Safety Planning

Advocates provide services to survivors that may continue to engage in trafficking or, as a result of recent trafficking experiences and/or investigative or prosecutorial activities, may find themselves in dangerous circumstances. A primary goal of the advocate relationship is to keep both the commercially sexually exploited youth (CSEY) survivor and the advocate safe from harm, so that other benefits from the relationship will have the opportunity to develop. The organization must be clear that this is a top priority for everyone affiliated with the program, including staff, volunteers and survivors.

1. The organization ensures that safety planning for the survivor is a core element of all advocate services, including emotional/relationship support and case management. Safety planning is *Top of Mind* for all representatives of the organization and includes emotional, as well as physical safety protections.

Description: Safety planning for advocates and survivors is evident in all operational procedures. Documentation of safety plans reflects required elements identified by the organization. Safety planning is inter-woven with all service planning and implementation, including case management activities. Illustrations of robust safety planning include:

- a. A safety plan is developed in collaboration with every survivor accepted into service,
- b. The first safety plan is completed at initial contact, even when there is limited information available and/or it is unclear if the survivor will remain in advocate services,
- c. Subsequent safety plans incorporate information gathered since the last survivor contact,
- d. Documentation reflects the date of development and new or existing factors contributing to increased danger, new triggers, safety resources and safety plans discussed at each review,
- e. Safety plans are reviewed and updated based upon the status of the survivor, at a minimum of once monthly,
- f. Safety plan information is shared with the CCT/MDT and care coordinator at staffings,
- g. Safety plans are updated in person whenever possible, except when a month elapses without in-person contact. Under the latter circumstances, the safety plan is updated by digital or telephonic means and documented accordingly,
- h. Elements contributing to the safety plan may be documented separately by the survivor and advocate,
- i. A copy of the safety plan is retained by or sent to the survivor and the advocate. This may be in digital form (e.g. text or social media platform),
- j. Training in the development and application of safety plans, including robust safety planning expectations, occurs during pre-service orientation and annually thereafter,

- k. Safety plans are reviewed routinely by the supervisor,
2. **Best Practice** – The complete safety plan is reviewed by other advocates, assigned investigative agency partner, and/or members of the CCT/MDT for recommendations.

Rationale: After getting basic survival needs met, such as food and shelter, survivors of complex trauma need to feel safe. This perception of *felt-safety*, has to be achieved before they can open themselves up to pursue other, more abstract or high-level needs leading to long-term wellness, such as acceptance and belonging. Felt-safety may be elusive and transient for these survivors, as dangers associated with their exploitation, and especially with efforts to escape from that exploitation, are frequently real and may be triggered by new or unexpected experiences. Living safety plans that are responsive to the survivor's current needs and perceptions are critical.

Training and Supervision

Advocates must be prepared for, and supported in, the challenging roles they carry out with survivors of commercial sexual exploitation. That begins with initial and on-going training in skills and competencies identified for all advocates by organization leadership. Over time, these should also reflect the individual needs of each staff as these are identified. To be effective in responding to these needs, supervisors should be provided with adequate tools and resources to ensure that everyone operates safely and effectively in their roles.

1. The organization will ensure that new employees hired for the role of advocate meet a minimum set of expectations and commitments concerning their suitability and preparation to be an advocate for commercially sexually exploited youth (CSEY). Readyng the new advocate must begin prior to assignment of any survivor to them, during the **pre-service** phase of training.

Description: Pre-Service training is defined as the period beginning with the first day of employment and ending upon satisfaction of the following:

- a. Completion of required number of pre-service training hours,
- b. Completion of all pre-service training elements,
- c. Documented approval by the advocate's supervisor that the advocate has successfully completed pre-service training elements.

The advocate organization may exceed, but not reduce or fail to apply the following structure to the **pre-service** training period:

- a. A minimum of 40 hours,
- b. Participants satisfy a brief competency assessment after each training element. This assessment documents mastery over the key concepts and applications of those concepts to the advocate's responsibilities,
- c. Documentation of the satisfactory completion of each pre-service training element is retained in the employee's personnel file,
- d. Participants complete an evaluation to provide feedback to the organization that will help them to improve all trainings,

- e. Any contact with survivor by advocates during this phase will only occur under the direct observation of a supervisor.

In addition to abuse prevention training and oversight targeted at keeping minors safe, addressed in other sections of these standards, the advocate organization may add to, but at a minimum, must include the following *pre-service* training topics:

- d. Understanding CSEY victimization,
- e. Collaboration and integration in planning and service delivery through, and outside of protocols with care coordinator, care coordination team(s) and advocates from other organizations,
- f. Trauma Based Relational Intervention (TBRI) or another model of trauma-informed care that has been approved by The Governor's Office,
- g. Cultural competency,
- h. Balancing confidentiality of survivor and investigative information with sharing of information with law enforcement, DFPS (and where present) Care Coordination Team partners.
- i. Self-Care and secondary trauma,
- j. Safety assessments, planning and available resources for survivor and advocate,
- k. Foundations of working with survivors of CSEY,
- l. Responding to suicidality in the CSEY population,
- m. Mandatory reporting responsibilities,
- n. Requirements for working with youth engaged with DFPS investigations, Family Based Safety Services and Conservatorship,
- o. Establishing and maintaining personal boundaries and communication with CSEY survivors and engaging in appropriate behavior including but not limited to the use of social media, giving and receiving gifts and safety for the advocate,
- p. Understanding, avoiding and responding to the risk of a co-dependent relationship with survivors,
- q. Balancing professional boundaries in carrying out emotional/relationship support and case management roles with care coordination team and/or individual collaborating organization partners,
- r. The CAC model and ways in which advocates might engage with CAC activities in the absence or presence of care coordination

Rationale: The unique, challenging and high risk nature of this role warrant a training phase where the organization and the new employee will focus on establishing understanding and core competencies in subjects that bear substantial impact on the safety and effectiveness of the role, prior to taking on advocate responsibilities for a survivor.

2. **Description:** The organization collaborates with the local CAC and/or CAC of Texas (CACTX) to provide training on the CAC model including but not limited to the following topics:
 - a. Multi-Disciplinary Team approach to child abuse investigations and service planning,
 - b. CACTX model,
 - c. Forensic interviews,
 - d. Local CAC services.

Rationale: CACs play an integral role in the criminal justice investigative process with youth that may have been victimized by abuse or neglect. In most communities where care coordination teams have been developed, the local CAC will be the care coordinator for victims of CSEY. Advocates that are engaged with these youth will work in close collaboration with these care coordinators, as well as others in the CAC, including the forensic examiners and family advocates. Because CSEY is another form of child abuse, it is important for advocates to fully understand how their local CAC operates and how they can, or in the presence of care coordination, will be expected to effectively engage with them.

3. Advocates must be sufficiently trained to ensure, wherever possible that services are reasonably effective, meet the needs of the survivor and collaborating partners, reflect best practices of the specialized CSEY advocate profession and build trust and enhance collaboration with stakeholders. Training must not be limited to the phase when an advocate is launching into their new role but must be offered throughout their tenure. Training should build upon the advocates' competencies and needs, reflect new modalities or approaches to care, and changes in requirements for the organization.

Description: The organization will establish and monitor the implementation of standard and individual training plans that address information and skills needed for emotional/relationship advocacy and case management responsibilities. Training will address professional, cultural and clinical aspects of the role that improve services to the survivor, support the advocate agency's operational agreements with guardians, care coordination partners, and other stakeholders, and provide care for the advocate.

Structured training will continue after the advocate is *in-service* and has been assigned survivors on their caseload. Each advocate, in coordination with their supervisor, develop an individual training plan. In addition to abuse prevention training and oversight, targeted at keeping minors safe, addressed in other sections of these standards, the advocate organization must include the following minimum training topics:

- a. Assisting survivors and their families to access Crime Victims Compensation,
- b. Motivational Interviewing and the Stages of Change model,
- c. Commercial Sexual Exploitation – Identification Tool (CSE-IT),
- d. **Best Practice** – 30 hours of TBRI instruction and field shadowing guidance from a certified TBRI Practitioner,
- e. **Best Practice** – Bonnie Martin's SERVE: A Brain-Based Approach to Working with Victims of Complex Trauma.

Rationale: The CSEY advocate role is a challenging one with many obstacles to achieving safety, stability and progress towards wellness with survivors. The role of CSEY advocate is new to many organizations that are responsible for decisions that will directly affect the youth, including juvenile justice and child welfare systems, law enforcement and criminal justice agencies. Advocates need to be trained in the most current models and practices of care to convey the greatest sense of competency. Training will also help to develop trust with their partners to build a sense of collaboration and investment in shared outcomes for survivors.

4. The Board of Directors and organization leaders have established clear expectations, structure and practices for staff performance with the objectives of improving advocate effectiveness, ensuring adherence to agency operational procedures, enhancing collaboration with survivors, their families and community partners, and keeping everyone involved in services, safe from harm. Oversight for these expectations, structure and practices will be carried out through advocate support, training and supervision.

Description: The organization provides supervisors with training on monitoring and supervision practices related to service safety and effectiveness. Supervisors are provided with advanced training on elements relied upon by advocates to be effective with survivors and their families and adhere to advocate organization expectations. Practices reflect that supervisors are provided with training and resources to determine needs for, and methods to provide advocates with support. Organization leadership has a clear operational strategy to monitor the adequacy and proficiency of advocate supervision. Advocate training plans, supervision practices and resources provided will reflect:

- a. Tools to collect and analyze feedback and other information gathered about advocates performance,
- b. Training instruments to assess advocates needs for education or skills training that are not only deficit-driven, but are strength-based, and include opportunities for professional growth,
- c. Trainings and supervision are provided at times and locations that are convenient and accessible to advocates,
- d. Coverage for an advocate's survivors' urgent requests is provided by the organization during selected trainings to support the advocate's ability to participate in, and focus on the training uninterrupted,
- e. Supervision practices reflect a culture of balancing support for staff with meeting survivor's needs, pursuit of high staff retention, and leadership actively shouldering advocate responsibilities with survivors during periods of high demand,
- f. While a lynchpin for many survivors' journey's to stability and well-being, the advocate-relationship has the potential to create vulnerabilities and reflect risks for each of them, as well as the advocate organization itself. Supervision will monitor documentation of communication and activities between them. Monitoring will include:
 - i. responding to indications of a healthy trust-based relationship,
 - ii. appropriate boundaries, and
 - iii. potential indications of co-dependency or insufficient survivor empowerment,
- g. Supervision is provided through mixed modalities and involving multiple roles/personnel in the organization including the first three below:
 - i. direct supervision, one-on-one with the advocate, relating to role performance (including documentation) and professional support,
 - ii. clinical supervision (may be same as direct supervisor) one-on-one or group, relating to understanding and responding to psychodynamics of complex trauma and other victimization outcomes,
 - iii. group supervision with other advocates (may include other roles or other organizations if includes TBRI community fidelity group), relating to education,

- peer performance feedback/service planning ideas, documentation, and advocate support,
- iv. **Best Practice** – Personal one-on-one counseling for advocate to address vicarious trauma and other stressors of their advocate experience.
 - h. **Best Practice** – Training on methods of supervising those in roles similar to that of the CSEY advocates, such as victim assistance advocates from the fields of law enforcement, domestic violence and rape crisis centers,
 - i. **Best Practice** – Training on supervision methods unique in their use **by** survivor leaders providing supervision or program consultation, and **with** survivor leaders in the role of advocates,
 - j. **Best Practice** – Establishment of, and active leadership in a TBRI community fidelity group.

Rationale: Advocate services are often delivered independently, not under the observation of organization colleagues or supervisors. Advocates respond to a wide range of emotional/relationship support and case management needs, some in accordance with the organized structure of the service plan and others, during periods of intense crisis. Even with TBRI or other forms of trauma-informed care, the complex trauma experienced by the survivors to whom they are assigned, and the emotional symptoms of their victimization can be very difficult for the advocate to manage. Advocates are likely to have substantial supervision needs to do their jobs safely, effectively, and to mitigate secondary trauma themselves.