

Policy Title: Serving Child Victims of Human Trafficking
Applies To: DHS Social Work Services Staff and CUA Case Management Staff
Replaces: Protocol for First Responders Crises Response Team for Reports Involving Commercial Sexual Exploitation of Children (CSEC), issued December 22, 2016

OVERVIEW:

The Federal Preventing Sex Trafficking and Strengthening Families Act was signed into law September 29, 2015. The Act required County Children and Youth Agencies to prevent, identify, address, and report severe forms of human trafficking of children and youth known to the child welfare system. In response to increasing concerns related to human trafficking, and to comply with and implement federal law, Pennsylvania enacted four relevant laws. In September 2019, the Pennsylvania Department of Human Services issued Bulletin 3130-19-04, *Serving Victims of Human Trafficking in Pennsylvania*. The bulletin addresses human trafficking of children, which includes commercial sexual exploitation and child victims of labor trafficking. These two modes of child victimization share common risk factors, triggers for identification, and approaches for meeting the needs of victims as well as some treatment and service provision.

The purpose of this policy and procedure guide is to provide guidance as to the responsibilities of DHS, CUA and Provider staff.

DEFINITIONS *(for terms that are new to staff)*

Term	Meaning
Child	In this document, “child” means an individual under age 18, under age 21 who committed an act of delinquency before age 18, or, if dependent court retains or resumes jurisdiction, an individual 18 to 21 years of age. (see 42 Pa. C.S. § 6302) “Child and youth,” “child or youth,” “children and youth” and “youth” are also used for “child” in this document.
CVHT	Child Victims of Human Trafficking
CSEC	Commercial Sexual Exploitation of Children. This term refers to a range of crimes and activities involving the sexual abuse or exploitation of a child for the financial benefit of any person or in exchange for anything of value (including monetary and non-monetary benefits) given or received by a person. It also includes situations where a child, whether or not at the direction of any other person, engages in sexual activity in exchange for anything of value, which includes non-monetary things such as food, shelter, drugs, or protection from any person.
Human Trafficking	Any activity in violation of 18 Pa.C.S. § 3011 (relating to trafficking in individuals) either alone or in conjunction with an activity in violation of 18 Pa.C.S. § 3012 (relating to involuntary servitude). Trafficking in individuals can be a second degree felony if the person recruits, entices, solicits, advertises, harbors, transports, provides, obtains, or maintains an individual if the person knowingly or recklessly disregards that the individual will be subject to labor servitude or knowing benefits financially or receives anything of value from any of these acts. A person commits a felony of the first degree if

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	the person engages in any of these acts that result in a minor being subjected to sexual servitude or knowingly benefits financially or receives anything of value from any of these acts.
Labor Trafficking	The recruitment, harboring, transportation, provision, or obtaining of a person for labor or service through the use of force, fraud or coercion for the purpose of subjection to involuntary servitude, peonage, debt bondage, or slavery (22 U.S.C. § 7102(11)(B)).
Missing Child	An individual who meets the definition of a “child” under the Juvenile Act (42 Pa. C.S. § 6302), known to DHS, and abducted or missing from the child’s residence including out of home placement.
Sexually Exploited Child	An individual under the age of 18 years of age who: <ol style="list-style-type: none"> 1. Is a victim of sexual servitude; or 2. Is a victim of an offense under 18 U.S.C. § 1591 (relating to sex trafficking of children or by force, fraud, or coercion) 18 Pa.C.S. § 3001.
Severe Forms of Human Trafficking	This is a federally defined term and includes sex trafficking and labor trafficking obtained by force, fraud, or coercion, or sex trafficking in which the person induced to perform such acts has not attained 18 years of age (22 U.S.C. § 7102(11)(A),(B)).
Sex Trafficking	The recruitment, harboring, transportation, provision, obtaining, patronizing, or soliciting of a person for the purpose of commercial sex. This includes any commercial sex act performed or provided by an individual that is induced or obtained by a combination of qualifying acts and means, or by an act alone if the victim is a minor (see generally 18 U.S.C. § 1591; 18 Pa.C.S. § 3001, 3011(a), (b)).

POLICY

Policy Statement

Children and youth identified as being victims of sex or labor trafficking as defined by the Trafficking Victims Protection Act (TVPA) are victims of child abuse and neglect. DHS Social Work Services Managers (SWSMs) and CUA Case Managers (CMs) will identify, report, and ensure the safety of all children and youth involved in the child welfare system who are victims or possible victims of human trafficking. Child and youth victims or possible victims of human trafficking will have their physical and mental health needs met in the least restrictive setting, within their own homes and communities if possible and appropriate. They will be involved in the planning for placement, treatment and services whenever age and developmentally appropriate. In accordance with the Preventing Sex Trafficking and Strengthening Families Act, youth 14 years of age and older must be consulted in all service and transition planning.

Screening potential victims of CVHT

DHS SWSMs and CUA CMs must ensure that screening is conducted for children and youth under their supervision who are possible victims of human trafficking. This includes those for who a general protective services assessment or child protective services investigation is being conducted as well as those that have been accepted for in-home or placement services.

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DHS SWSMs and CUA CMs must screen for CVHT:

- As part of the Safety Assessment and Management Process.
- When a DHS-involved child or youth who has been missing from home or out-of-home placement is located.
- If concerns arise throughout the life of the case that human trafficking may be occurring.

Assessment of Potential Victims of CVHT

DHS must arrange for a full assessment when indicators of trafficking are identified through administration of a screening process and an additional evaluation is warranted based on the results of the screening.

Multi-Disciplinary Investigative Teams

DHS SWSMs will cooperate and coordinate investigations with law enforcement officials when they involve the abuse of a child or youth that includes possible human trafficking crimes against a child or youth.

Addressing physical and mental health needs of child victims

Human trafficking victims often have serious and significant mental health needs and may have experienced complex trauma. In all cases, DHS staff should ensure that a victim receives a mental health examination as soon as possible. A specialized medical examination for child victims of human trafficking must be scheduled within 72 hours of contact.

Placement, Treatment, and Services

DHS must make efforts to safely maintain child victims of human trafficking in their own homes and communities and to engage parents and legal guardians whenever possible. In accordance with the Preventing Sex Trafficking and Strengthening Families Act, youth 14 years of age and older must be consulted in all service and transition planning.

In service planning and provision, DHS should provide, directly or through providers, specialized programs and services to address victims' needs.

Dependency rather than Delinquency Adjudication – related to the Safe Harbor Law

A child who commits an eligible delinquent offense under 42 Pa.C.S. § 6328 as a direct result of being a sexually exploited child or one directly related to having been subject to human trafficking will be referred to DHS for consideration of a dependency finding rather than delinquency proceedings. Eligible delinquent offenses under 42 Pa.C.S. § 6328(b) for referral to the county agency include the following:

- 18 Pa.C.S. § 3503 (relating to criminal trespass).
- 18 Pa.C.S. § 4914 (relating to false identification to law enforcement authorities).
- 18 Pa.C.S. § 5503 (relating to disorderly conduct).
- 18 Pa.C.S. § 5506 (relating to loitering and prowling at night time).
- An offense for simple possession of a controlled substance under section 13(a)(16) and (31) of the act of April 14, 1972 (P.L.233, No.64), known as The Controlled Substance, Drug, Device and Cosmetic Act.

If treatment and social services are unsuccessful as evidenced by the child or youth's behavior while the dependency petition is pending, the DHS or CUA staff must refer to the Sex Abuse Investigations Serving Child Victims of Human Trafficking

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Administrator or Special Investigations Director for a consultation. The Sex Abuse Investigations Administrator or Special Investigations Director will determine whether a CSEC teaming is needed. Based on that teaming a decision will be made as to whether the child or youth needs services that are available through the juvenile justice system. A decision to refer back to the delinquency system must be approved by the Operations Director. If approved, the Sex Abuse Investigations Administrator or Special Investigations Director will refer the child or youth back to the delinquent system for initiation of delinquency proceedings. 42 Pa.C.S. § 6328 (c).

Reporting Missing Children and Youth

It is the responsibility of assigned DHS Workers, CUA CMs, or Provider Agency staff to report a missing or abducted child or youth to law enforcement officials and to the National Center for Missing and Exploited Children (NCMEC) as soon as possible, but no later than 24 hours after receiving information about a missing or abducted child.

Consistent with *Missing Persons Search, Notification, and Tracking*, effective January 2020:

- Children and youth missing from out-of-home care must be reported **immediately** to law enforcement officials by DHS, CUA, or Provider agency staff for entry into the National Crime Information Center (NCIC) database and reported to the National Center for Missing and Exploited Children.
- DHS SWSM or CUA CM Team must notify:
 - The assigned chain of command up to and including the Director.
 - CWO Leadership if the missing child is 12 of age or younger as required by the DHS High-Profile Case policy.
- Within **one business day**, notify the assigned City Solicitor or Court Representative in the Law Department.

As soon as possible, **but not more than 24 hours**, staff must also notify the following:

- Parents or legal guardians (unless parental or guardianship rights have been terminated).
- The child or youth's lawyer or guardian *ad litem*.

Within 24 hours of the notification, DHS must update the PA DHS statewide database with the required information and ensure that the placement provider completes a Home and Community Services Information System (HCSIS) report. When a child or youth runs away from out-of-home care, across a state lines, the Interstate Compact for Juveniles must be contacted at: [https://www.ogc.pa.gov/Extradition/Pages/Interstate-Compact-for-Juveniles-\(ICJ\).aspx](https://www.ogc.pa.gov/Extradition/Pages/Interstate-Compact-for-Juveniles-(ICJ).aspx).

Children and youth under DHS care and supervision who are missing from placement are particularly vulnerable to victimization, including human trafficking. When a child or youth returns or is recovered, it is of utmost importance to screen for human trafficking victimization and conduct an assessment if indicated. When a child is located and recovered, the law enforcement organization that entered the child into NCIC and NCMEC must be immediately notified.

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Procedure Title:	Serving Child Victims of Human Trafficking
Applies To:	DHS Social Work Services Staff and CUA Case Management Staff
Related Policy:	Serving Child Victims of Human Trafficking

PROCEDURE OVERVIEW

At every point of contact with a child or youth who may be a victim of human trafficking, the CVHT unit will be notified so that they can determine whether an assessment is needed; appropriate services will be identified and provided to meet the child or youth's needs; children and youth charged with certain offenses will be treated as dependents unless a teaming determines that dependent services are not meeting the child or youth's needs.

PROCEDURE and PRACTICE CONSIDERATIONS

Practice Consideration for CVHT Screening

- Strength-based, non-judgmental, and trauma-informed approaches should be used to engage the child or youth in a conversation based on the child or youth's developmental and intellectual ability to secure an answer to the indicators not already answered with a 'Yes' on the screening tool.
- Workers need to keep in mind that a child or youth may be reluctant to respond due to a lack of trust, fear of consequences related to disclosure and/or not viewing themselves as a victim.
- Workers should not read the items verbatim to the child or youth.
- Workers should inform every child or youth that information regarding their immigration status is confidential and can only be shared with the child or youth's consent. Staff should consult with their supervisor before communicating any information about a child's documentation status. Staff should never disclose immigration status to federal or local law enforcement without first consulting their supervisor.
- A child or youth should not be interviewed in front of a suspected trafficker or individual who is exhibiting controlling behavior over the child or youth.
- Workers should never permit the suspected trafficker to interpret for the child or youth if the child or youth does not understand and speak English fluently.
- Workers must arrange for interpreter services for any child or youth who does not understand or speak English fluently or who are deaf or hard of hearing.

ROLES AND RESPONSIBILITIES (*what happens, who does it, what are the time frames, how is it documented*)

DHS Hotline Responsibilities

- Screening
 - Any social condition brought up during the Hotline Guided Decision-Making assessment that is consistent with Tier One or Tier Two criteria on the CVHT screen will be completed by Hotline SWSMs on the CVHT screen in PFDS.

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- Generating Reports
 - When the Hotline receives a call regarding a child or youth who has been identified as a potential victim of Commercial Sexual Exploitation or human trafficking from a mandated reporter, the Hotline SWSM will take the information and generate a report if the information rises to the level of a report based on Hotline Guided Decision Making.
 - The Hotline will generate a report when it receives a referral with allegations about a child or youth involved in prostitution, even if the minor appears to be acting alone and without involvement from anyone else.
 - Allegations of prostitution by a parent or guardian will be taken as a report if there is information indicating that the situation rises to the level of a report based on Hotline Guided Decision Making.
 - If a report is generated, the Hotline SWSM or Supervisor must check the appropriate code (Prostitution or CVHT) and assign these cases to the Sex Abuse Investigations queue when applicable.
 - If allegations from a reporter include any CVHT assessment indicators, but the referral is not taken as a report because it does not meet the level of a report or there is minimal party information, i.e. names or addresses, an email must be sent to the CVHT email address (DHS.CSECA@phila.gov). The Sex Abuse Investigations Administrator will determine whether the child or youth needs a CSEC assessment or follow up with the assigned CUA team if it is an open CUA case.
- Notifications
 - After generating the report, the Hotline SWSM or Supervisor will contact the Sex Abuse Investigations Administrator or the Special Investigations Director, or designee regardless of the time or day to inform of the following instances:
 - When a child or youth for whom the police have reasonable suspicion is involved in CVHT is brought to the DHS Office.
 - When the Hotline receives a call from Law Enforcement regarding a child or youth who is suspected to be involved in CVHT and they are being detained at the Law Enforcement agency.
 - If a child or youth is abandoned/without a responsible caregiver and brought to DHS because of the parent or legal guardian's prostitution arrest or if there is suspicion that the child or youth was involved or physically present during the parent or guardian's prostitution activities.
 - The parent or guardian's prostitution alone is not a reportable incident unless it directly involves or affects the child or youth.
 - If there are any questions or assistance needed, the Hotline SWSM or Supervisor should contact the Sex Abuse Investigations Administrator for a consultation before rejecting a report.
 - For active cases, Hotline will notify the assigned DHS or CUA chain of command via an FYI email whether a CVHT report was generated. The Sex Abuse Investigations Administrator or designee should be copied on the FYI email whenever there is a concern regarding CVHT.
 - If there is no Crisis Response Team member available to make initial after hours contact, a Hotline SWSM will make the initial contact within the required response time. Once contact is made, Hotline will forward the report to Sex Abuse Investigations.

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DHS Critical Investigations/Crisis Response Team (CRT) Responsibilities

- When a member of the CRT First receives a call regarding CVHT from a mandated reporter, the Crisis Response Team SWSM or SWS will instruct them that a report must be made to ChildLine. The Hotline SWA will be alerted that a call will be made to report suspected CVHT.
- CRT staff make the initial contact within specified CPS time frame even if a report is made after-hours of a child or youth on an active case who is suspected of being a CVHT. The Hotline will contact the Sex Abuse Investigations Administrator who will assign a Crisis Response Team SWSM to go out to make the initial contact within the identified CPS response time and complete a CVHT screening.
- If it is a new CVHT report, it will be assigned to Sex Abuse Investigations to be investigated by the Crisis Response Team whenever possible. The Sex Abuse Investigations Administrator or designee will develop a screening plan to meet the identified response time.
- The CRT member will go out to make the initial contact within the identified response time and complete a CVHT screening.
- If report is on a child or youth active with DHS or CUA, the Crisis Response Team SWSM will inform the assigned Investigations or Case Management team of any work completed regarding the report and initial contact.
- All cases with allegations of children or youth (or parent or legal guardian if it directly involves or affects the child or youth) being involved in prostitution, with or without an adult's provision of the alleged child or youth victim in a commercial sex act, will be assigned to a Crisis Response Team member for investigation whenever possible.
- If it is learned that the Philadelphia Police Department, Special Victims Unit has not received a CY-104, or if Law Enforcement has not been assigned as needed, the DHS Crisis Response Team unit staff will ensure delivery of a copy of the CY-104 to Law Enforcement.
- A Sex Abuse Investigations staff member will participate in Working to Restore Adolescents' Power (WRAP) Court to provide support and information to DHS and CUA staff about children and youth identified by WRAP Court as possible or actual victims of CVHT. They will also begin to collaborate and build MDT opportunities by reaching out to the following community partners: Salvation Army, PPD, CUA 1-10, City Wide Vice, D.A., DHS Law Dept, and Philadelphia Children's Alliance.

DHS SW Teams and CUA Case Management Teams Responsibilities

- As part of ongoing assessment of safety in every case whether under investigation or assessment, or actively receiving services, the Child Victims of Human Trafficking (CVHT) Screening Tool and Assessment Referral must be completed according to the SAMP interval. At each contact, as part of assessing safety, SWSMs and CUA CMs should look for and document any indications of any of the Tier One or Tier Two indicators of CVHT.
- If there are any Tier One or Tier Two indicators, DHS SW teams or CUA CM teams must request a consultation with the Sex Abuse Investigator Administrator, or Special Investigations Director who will determine whether to refer the child or youth for a CVHT assessment.
 - DHS SW teams and CUA CM teams should not refer directly to Philadelphia Children's Alliance. All referrals for CVHT assessment should be made by the CRT Sex Abuse Administrator or Director to ensure tracking and follow-up consultation, if needed.

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- If a case has already been assigned to another Sex Abuse Investigator, Intake, or MDT Investigation team, the case needs to be conferenced with the Sex Abuse Investigations Administrator to determine next steps, possible reassignment, or assistance from a Crisis Response Team SWSM.
- **Open Investigations or Active cases:**
 - Upon learning that CVHT is suspected, the assigned SW team will request a consultation with the Sex Abuse Investigations Administrator to discuss how to move forward with the report. CVHT screening will be discussed to assess whether an assessment is needed.
 - A consultation with the DHS Psychologists is required under the Mandatory Consultation policy. The Sex Abuse Investigations Administrator may schedule a Teaming or schedule a consultation with the DHS Psychologists in which the Investigation SW team or CUA CM team can participate.
- To schedule a CVHT consultation, DHS SW teams must call 215-683-8300 or email the Sex Abuse Investigations Administrator, Alissa R. Graves at alissa.r.graves@phila.gov; CUA Case Management teams send an email to the CVHT email address (DHS.CSECA@phila.gov) to request a conference date. The Sex Abuse Investigations Administrator will determine the need for a teaming. The following information must be provided:
 - Name of child or youth.
 - Case number and suffix.
 - DOB of child or youth.
 - Brief summary of suspected or known CVHT involvement, including involvement with Law Enforcement or Court.
 - Assigned Worker's contact information.
- The Single Case Plan or FSP/PPP should include objectives and actions related to specialized programs and services to address victims' needs, the availability of safe and stable housing, access to education, employment and life-skills training, comprehensive case management, physical and behavioral health care to include trauma therapy, treatment for drug and alcohol dependency, medical and dental care, access to personal care items and adequate clothing, and other identified needs.
- CUA CMs must alert DHS Family Team Conference (FTC) staff that the child or youth is a victim of CVHT so that they know to invite appropriate professionals to participate in the FTC.

DHS Family Team Conference Staff (FTC) Responsibilities

- For Family Team Conferences where a child or youth is a victim of CVHT, in addition to regular invitees, DHS FTC staff will invite appropriate professionals such as DHS Psychologists, Sex Abuse Investigations Administrator and providers of services.

Philadelphia Children's Alliance Responsibilities

- Conducting trafficking assessments.
- Providing treatment/Resource referrals.
- Making referrals to, or providing mental health services.
- Making referrals to services SARC provides to youth 16 years of age and older who are receiving acute medical attention.

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Salvation Army New Day Victim Advocate Responsibilities

- New Day Victim Advocate staff advocate for and support victims of Human Trafficking by being present in the courtroom, providing emotional support to survivors, offering technical assistance, and acting as a resource connection to the Court itself, including, but not limited to, the following:
 - Provide comprehensive clinical and mobile case management services to at-risk individuals and survivors of sex trafficking through client accompaniment, advocacy, safety planning, and linkages and referrals.
 - Attend every Working to Restore Adolescents Power (WRAP) Court hearing and be available in the courtroom for technical assistance, to complete Human Trafficking assessments, and to provide emotional support for all clients.
 - Act as a connection and liaison between the many systems that survivors of human trafficking encounter, including but not limited to, DHS, CUAs, probation, mental health, shelter systems, etc.
 - Provide written assessment reports and training to DHS and CUAs to increase the identification of at-risk individuals and survivors of trafficking within the child welfare system.
 - Cooperate with DHS, including DHS contracted investigators and Social Work staff, and CUAs in any investigation concerning the client, such as AWOL/missing child investigations.
 - In lieu of written court reports, the Victim Advocate will testify as to the date they met with the child or youth and the services that were provided. If the Victim Advocate is not available to testify, a written court report shall be submitted before the WRAP Court hearing.
 - Share information with DHS and CUAs as necessary for the safety and protection of the client they are serving.

Working to Restore Adolescents Power (WRAP) Court Responsibilities

- WRAP Court serves children and youth with dependency, delinquency and/or crossover matters who have been identified as victims of human trafficking. To the greatest extent possible, WRAP Court will provide treatment and services through dependency court rather than delinquency court.
- Cases appropriate for WRAP Court may be identified in many ways and can be accepted into the WRAP Court program at any time that Family Court has jurisdiction over the child or youth.
 - There is no minimum age requirement for participation in WRAP Court.
 - A youth may remain under the court's supervision until the age of 21.
- WRAP Court offers alternatives to detention and a range of comprehensive services, support, and supervision to educate the children and youth and support their efforts to move away from exploitation, dangerous and delinquent behaviors, and the likelihood of future incarceration.
- WRAP Court's multi-system coordinated approach is provided through partnership with the following persons or entities: Court/Judge, child or youth, child or youth's lawyer, parents and legal guardians, parent and guardians' lawyers, Phila. DHS and Community Umbrella Agencies (CUAs), City of Philadelphia Law Department, Philadelphia District Attorney's Office, Community Behavioral Health (CBH), Juvenile Probation Officer(s) and several community-based organizations such as the Salvation Army, New Day to Stop Trafficking Program, and Philadelphia Children's Alliance (PCA).

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Safe Harbor Teamings

- CUA Case Management Team Responsibilities
 - Children and youth who receive dependent services after committing specific delinquent acts related to sexual exploitation or human trafficking and who exhibit behaviors indicating that they may need services from the delinquent system must be referred to the Sex Abuse Investigations Administrator for a consultation by CUA CMs. Concerning behaviors include:
 - Any Tier One behavior on the CSEC Assessment form.
 - Recruiting behavior.
 - AWOL.
 - Other trafficking-related behaviors such as frequenting locations significant in their trafficking history or possessing expensive items not purchased for them.
 - Referrals should be made using the Safe Harbor Teaming Referral and Documentation form.
- Sex Abuse Investigations Responsibilities
 - Referrals for a Safe Harbor teaming will be reviewed by the Sex Abuse Investigations Administrator or Director who will determine whether a teaming is necessary and who should be invited to the teaming.
 - A Safe Harbor teaming must be documented on the Safe Harbor Referral and Documentation form.
 - Documentation must include, at minimum, a review of services offered and provided to the child or youth, why the services have not been effective in addressing the child or youth's needs, and recommendations.
- A decision to refer the child or youth back to the delinquent system must be reviewed and approved by the Operations Director of the chain of command responsible for the case.

DOCUMENTATION REQUIREMENTS

- The Child Victims of Human Trafficking (CVHT) Screening Tool and Assessment Referral must be uploaded to the electronic case record.
- Consultations with the Sex Abuse Investigations Administrator must be documented in a Structured Progress Note in the electronic case record.
- Copies of Safe Harbor Referral and Documentation form must be uploaded to the electronic case record.
- Consultations with the DHS Psychologists must be documented in the electronic case record.
- Copies of CVHT assessments must be uploaded to the electronic case record.
- Copies of all evaluations related to the needs of child and youth victims of CVHT must be uploaded to the electronic case record.
- Objectives, actions, services and providers of services to meet the specialized needs of children and youth who are victims of CVHT must be included in the SCP or FSP/PPP.

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**RELATED DOCUMENTS AND
RESOURCES:**

Attachments:

Forms: Child Victims of Human Trafficking (CVHT) Screening Tool and Assessment Referral (**Note:** this form replaces the 2018 Commercial Sexual Exploitation of Children Screening Tool and Assessment and Referral.)
Safe Harbor Referral and Documentation form

Related Policies or Procedures: Hotline Guided Decision-Making Guide, December 2018.
Law Department - Guide for DHS Workers and CUA Case Managers on Mandatory Consultations, issued February 2017.
DHS Psychologists - Guide for DHS Workers and CUA Case Managers on Mandatory Consultations, issued February 2017.
Missing Persons Search, Notification, and Tracking, effective January 2020.

Other Resources:

POLICY AND PROCEDURE REVIEW AND APPROVAL

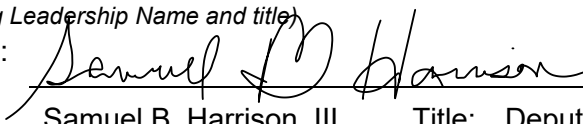
APPROVED BY: Samuel B. Harrison, III, Deputy Commissioner, Child Welfare Operations

REVIEWED BY: Kimberly Ali, Commissioner
Katherine Garzon, Chief of Staff to the Commissioner
Gary D. Williams, Deputy Commissioner, Policy Development and System Enhancement
Carla Sanders, Operations Director, Front End Services
Staci Morgan Boyd, Operations Director, CWO Child and Family Services
Stephanie Ali, Special Investigations Director
Zachary S. Harris, Hotline Director
Luis A. Santiago Sobrado, Policy and Planning Director
Meghan R. Goddard, Esq., Divisional Deputy City Solicitor, Child Welfare Unit, City of Philadelphia Law Department

APPROVAL SIGNATURE

(Authorizing Leadership Name and title)

Signature:



Date: 7/23/2021

Name: Samuel B. Harrison, III Title: Deputy Commissioner, Child Welfare Operations

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