

Anti-Human Trafficking

A Toolkit for Healthcare Environments



GDAHA
Greater Dayton Area Hospital Association



**THE HEALTH
COLLABORATIVE**

Outline

Foundational Strategies

1. Establish a multidisciplinary internal advisory board
2. Provide regular training and awareness opportunities
3. Identify critical staff roles
4. Participate in and contribute to community-based coalitions
5. Adopt and standardize supportive care approaches
 - a. Trauma Informed Care
 - b. Harm Reduction

Operational Strategies

1. Specific and separate institutional policy
2. Evidence-based, sensitive screening and triage
3. In-depth assessment
4. Personalized, confidential discharge and referral processes
5. Standardized reporting and documentation processes
 - a. Electronic Health Records
 - b. Coding

Introduction

This document contains considerations and guidance for healthcare providers developing a protocol on identifying and responding to adult victims of human trafficking. See the Pediatric Tool Kit for Mandated Reporting of Minors experiencing suspected human trafficking.

This guide is not meant to be a comprehensive resource on how to respond; this is meant to be a toolkit for healthcare facilities to use in developing response and referral protocols. It is important to note that action – any action – is better than inaction. System leaders and decision-makers should take into consideration the resources available to them and the stage of change that their system, staff, and community are in before implementing the practices within this toolkit. Through education and the development of safe policies and procedures at healthcare facilities, we hope to provide tools for healthcare professionals to be able to educate and empower exploited adults and minors about ways to be safe and seek assistance.

Developing a response protocol may require a significant investment in time and resources, but this process has several benefits, including:

- Clarifies roles, responsibilities, and procedures for identifying, responding, and reporting suspected cases of trafficking
- Improves staff’s ability to recognize patients at risk for human trafficking and provide appropriate treatment and referrals
- Proactively prepares institutions for situations in which a trafficker may pose an immediate threat to patients or staff
- Encourages collaboration with outside agencies essential to responding to human trafficking
- Improves preparedness to respond to needs identified by a potential human trafficking survivor

Because each healthcare institution has unique resources, processes, and patient populations, this toolkit provides templates for adapting to your existing infrastructure and processes.

Additionally, because no toolkit can anticipate all the possible scenarios and presentations of human trafficking and exploitation, the following resources can provide 24/7 support for assessments, consultation, and referrals:

Regional	National
<p>Cincinnati</p> <ul style="list-style-type: none"> • Greater Cincinnati Human Trafficking Hotline 513-800-1863 	<p>National Human Trafficking Hotline</p> <ul style="list-style-type: none"> • 1-888-373-7888 help@humantraffickinghotline.org www.humantraffickinghotline.org

- **End Slavery Cincinnati**
513-762-5690
escoutreach@gmail.com
<https://easternusa.salvationarmy.org/greater-cincinnati/end-slavery-cincinnati/>

Dayton

- **YWCA Dayton**
937-222-SAFE (7233)
Call/Chat: ywcadayton.org
rapecrisis@ywcadayton.org
<https://www.ywcadayton.org/what-were-doing/violence-prevention-response/crisis-hotline/>

Abolition Ohio

- udayton.edu/artssciences/ctr/hrc/experiential-learning/abolition_ohio/stop/index.php

Northern Kentucky

- **ION Center**
859-491-3335 24/7
606-564-6708 (Buffalo Trace)
<https://ioncenter.org/>

Artemis Center

- 1-800-799-SAFE (7233)
Text "START" to 88788
https://www.thehotline.org/?utm_source=youtube&utm_medium=organic&utm_campaign=domestic_violence

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We want to express our gratitude to those who initiated the development of this toolkit in 2019 and have since moved on to new opportunities. Your foundational work has been invaluable.

Foundational Strategies

Healthcare providers are best prepared to respond to human trafficking if they have built a supportive foundation. Through the work of multiple agencies, the following strategies have been identified as ideal practices in setting the stage for effective clinical responses to human trafficking.

1. Establish a multidisciplinary internal advisory board
2. Provide regular training and awareness opportunities
3. Identify critical staff roles
4. Participate in and contribute to community-based coalitions
5. Adopt and standardize supportive care approaches:
 - a. Trauma Informed Care
 - b. Harm Reduction
 - c. Strategies for Labor Trafficking

1. Establish a multidisciplinary internal advisory board

Ideally, healthcare institutions should have an internal committee or advisory board dedicated to addressing human trafficking within their scope of care. To function well, this board should:

- Have access to internal data specific to human trafficking activity and patient outcomes
- Dedicate time, space, and technology for meetings and archives
- Formulate a budget for sponsoring the development of materials and/or training

Structure

The board should be multidisciplinary with participation from a variety of departments and levels of staff throughout the organization. Healthcare institutions may consider including the following departments and/or roles on their board:

Potential Departments

- Emergency/Ambulatory Services
- Labor and Delivery or Ob/Gyn
- Pediatrics
- Health Informatics
- Information Technology
- Government Relations
- Communications/PR
- Legal Services
- Dentistry
- Pre-Hospital Partners (EMS/Campus Police)

Potential Roles/Titles

- Social Workers
- Nurses (floor nurses, forensic nurse examiners, etc.)
- Physicians
- Senior Leadership
- Registrars
- Project Managers
- Interpreters
- Patient Advocates
- Persons with human trafficking lived experience
- Family/friends of persons with human trafficking lived experience
- Regulatory/Accreditation Professionals

In addition to well-rounded representation, the board should have a clear and formal pathway for requesting additional resources or approval of new processes/procedures from senior leadership within the institution.

2. Provide regular training and awareness opportunities

Healthcare professionals should have access to regular training and education opportunities on human trafficking. These educational opportunities should be content- and skills- based, especially as the national anti-human trafficking movement develops best practices and as the local landscape on this issue evolves.

An ideal training infrastructure includes:

- Anti-human trafficking education as part of onboarding for all staff in clinical settings
- Regularly occurring education (e.g. journal clubs, lunch and learns, etc.) in key departments
- Regular contributions from internal learning modules to the health system

Durable Training Resources

The following resources are available for supporting internal training and awareness opportunities:



Read

- [National Center for Missing and Exploited Children](#): on-demand trainings, resources and best practices related to missing and exploited children
- [SOAR Online](#): online, on-demand modules for CE/CME for a variety of healthcare and social service professionals
- [Ohio Nurses' Association](#): online, on-demand introductory course for nursing CE credits
- [Ohio Human Trafficking Task Force](#): online, on-demand training
- [End Slavery Cincinnati](#): onsite or virtual training for regional providers



Watch/Listen

- [Human Trafficking Response: Resources for Health Care Professionals](#)
- [The Reality of Labor Trafficking Webinar Replay](#)
- [Human Trafficking 101: Dispelling the Myths](#)
- [HEAL Webinars](#)



Ideal interpretation is in-person with a third party. Utilizing the person accompanying the victim or a community member to interpret could compromise disclosure and assessment.

3. Identify critical staff roles

For a healthcare institution to respond quickly and effectively, the following roles should be adequately staffed per regional and health system standards (either internal to the organization or contracted with external organizations):

- Forensic nurse examiners
- Social Workers (available 24/7)
- Behavioral Health
- Interpreters
- Early Intervention
- Patient Advocates

4. Participate in and contribute to community-based coalitions

Human trafficking starts in the neighborhoods and communities surrounding a healthcare institution. To truly interrupt human trafficking activity at a regional level, healthcare institutions should be in regular dialogue with the other organizations that are working on this issue in their community.

Resources

Below are some Ohio-based options for participating in collaborative efforts to address human trafficking, exploitation, and trauma.

- [Trauma Informed Care Ohio Collaboratives](#)
- [Human Trafficking Coalitions](#)
 - [End Slavery Cincinnati](#)
- [Hamilton County Harm Reduction Coalition](#)
- [Abolition Ohio](#)
- [The Ion Center](#)
- [Oasis House](#)
- [Grace Haven](#) (12-17 year olds)
- [Women Helping Women](#)
- [Ohio Criminal Justice Services](#)

5. Adopt and standardize supportive care approaches

People who are being or have been trafficked have unique trauma and care needs. Fortunately, there are several evidence-based approaches to care that can foster trust and improve outcomes for patients with these unique needs. Two specific approaches recommended as best practices for healthcare providers are outlined below.

Trauma Informed Care

A trauma-informed approach is a way to engage with people who have histories of trauma. When working with an individual who has experienced trafficking, it is important to recognize how the trauma of their experiences impacts how they interact with service providers, law enforcement, and others. The goal when working with potential victims should be avoiding re-traumatization and increasing safety.

Trauma-informed programs generally recognize the following:

- A survivor's need to be respected, informed, connected, and hopeful about their recovery.
- The interrelation between trauma and symptoms of trauma such as substance abuse, eating disorders, depression, and anxiety.
- The need to work in a collaborative way with survivors, family and friends of the survivor, and other human services agencies in a manner that will empower survivors and consumers.

Professional training in trauma-informed care is highly encouraged when working with trafficked individuals and other, at-risk populations. The [Tristate Trauma Network](#) provides access to local and timely training opportunities and resources. Additional resources are below.



Read

- [Ohio Department of Mental Health and Addiction Services Resource Library](#)
- [PEARR Tool: Victim-Centered and Trauma-Informed Screening](#)



Watch/Listen

- [SOAR Online Trauma Informed Care Training](#)
- [Physician Perspective: Providing Medical Safe Haven Patient Visits to Survivors of Human Trafficking](#)
- [Human Trafficking: A Trauma-Informed Health Care Response](#)
- [What is Trauma Informed Care?](#)
- [SAKI Toolkit: The Neurobiology of Trauma](#)

Harm Reduction

Harm Reduction is a philosophy that aims simply to keep people alive until they are ready to seek care rather than to stop unhealthy behaviors. Effective and compassionate harm reduction tactics will minimize negative outcomes without judgment and stigma, requiring healthcare providers to acknowledge that patients may continue to engage in high-risk activities. While harm reduction is often connected to addiction and drug use or sex work, its concepts can be mapped onto myriad other situations, including human trafficking. Healthcare institutions have a unique opportunity to adopt this approach to keep people who are being trafficked safe until they can escape or are ready to leave their trafficking situation. For minor patients experiencing trafficking or any other reportable maltreatment, it would not be appropriate to delay mandated reporting and delaying mandated reporting is not part of a harm reduction approach. See the Pediatric Tool Kit for Mandated Reporting of Minors experiencing suspected human trafficking.

Below are some resources to help healthcare professionals learn the concepts of Harm Reduction and integrate them into their practice:

- [Harm reduction principles for healthcare settings](#)
- [The Integration of Harm Reduction and Healthcare](#)
- [National Harm Reduction Coalition Resource Center](#)
- [Hamilton County Harm Reduction Resources](#)
- [Harm Reduction Ohio](#)

Strategies for Labor Trafficking

The following is a durable training resource for professionals in healthcare and public health on how to identify and appropriately care for victims of labor trafficking in healthcare settings: [HEAL Labor Trafficking Educational Video](#).

Operational Strategies

In conjunction with a strong foundation of human resources, compassionate care approaches, institutional knowledge, and multidisciplinary networks, effective operational strategies can ensure that identifying and responding to human trafficking is no longer subjective, but rather evidence-based, standardized, and supported by technology. Robust operational strategies often include:

1. Specific and separate institutional policy
2. Evidence-based, sensitive screening and/or triage mechanisms
3. In-depth assessment
4. Personalized, confidential discharge and referral processes
5. Standardized reporting and documentation processes

1. Specific and separate institutional policy

Standardizing the response to human trafficking through written policy is a great first step in building healthcare institution capacity. As you develop your policy, we encourage healthcare facilities to review and update existing protocols addressing other forms of abuse and violence, including intimate partner violence, child abuse, elder abuse, and sexual assault. Consider incorporating the human trafficking response into existing protocols to streamline training, treatment, and referrals.

An ideal institutional policy:

- Is separate from domestic violence/abuse policies
- Includes decision aids for clinical staff
- Is updated regularly as policy and resources change

Resources

Ultimately, healthcare administrators and providers know their systems best, and should build a policy that is compatible with their current system. Below are some resources that may assist you as you develop your policy.



Read

- [The Joint Commission: Quick Safety Identifying Human Trafficking Victims](#)
- [National Human Trafficking Hotline: Framework for a Human Trafficking Protocol in Healthcare Settings](#)
- [HEAL Trafficking and Hope for Justice's Protocol Toolkit for Developing a Response to Victims of Human Trafficking in Health Care Settings](#)
- [HEAL Trafficking: Protocol Examples](#)



Watch/Listen

- [American Hospital Association: Building a Hospital-based Human Trafficking Identification and Response Program](#)

PARTNER SPOTLIGHT

Bon Secours Mercy Health was featured in a 2019 article titled "Printed protocols help staff screen for trafficking victims." To read their journey and view their tool, visit [this link](#).

2. Evidence-based, sensitive screening and triage

In a healthcare setting, an appropriate screening and triage mechanism will provide an opportunity to escalate concerns about a patient for additional assessment. Screening and triage need not be detailed or time consuming.

Screening and triage of patients to determine if they need further assessment is ideally:

- Conducted individually and in a private setting
- Documented in electronic health record
 - Items for inclusion in the patient record include appropriate ICD-10 codes, physical identifiers to distinguish patient when and if they move between health systems using different names, and appropriate application of the [Open Notes Ruling](#).

As of the writing of this document, there are no validated screening tools for adult victims of labor or sex trafficking. However, there are myriad resources for developing your initial screening or triage questions. Additionally, there is a validated screening tool for child victims of sex trafficking.



Read

- [The National Human Trafficking Hotline: What to Look for in a Healthcare Setting](#)
- [Out of the Shadows: A Tool for the Identification of Victims of Human Trafficking](#)
- [Pretesting a Human Trafficking Screening Tool in the Child Welfare and Runaway and Homeless Youth Systems](#)
- [Toolkit and Guide: Adult Human Trafficking Screening](#)



Watch/Listen

- [The National Human Trafficking Resource Center: Recognizing and Responding to Human Trafficking in a Healthcare Context](#)
- [American Hospital Association Best Practices for Screening and Assessing Patients for Trafficking](#)
- [US Department of Health and Human Services: Screening to Identify Trafficking Survivors](#)

Additionally, the Greater Cincinnati Human Trafficking Hotline and YWCA Dayton can aid in determining if the situation constitutes as human trafficking.

3. In-depth assessment

When a patient screens positive for potential human trafficking, it is important to engage that patient in an in-depth assessment to determine readiness for reporting (if not a minor) and identify resources and referrals that will be helpful to the patient. The goal of assessment is not to rescue a patient or convince them to report, but to determine their readiness to report and identify opportunities for providing resources. Suspected human trafficking in minors should always be reported. See the Pediatric Tool Kit for Mandated Reporting of Minors experiencing suspected human trafficking.

By virtue of their education, FNE and social workers have the expertise to complete thorough, trauma-informed assessments and assist patients with safety planning. Ideally, your organization has a process for deploying FNE and social workers when human trafficking is suspected. Including the patient advocate is of the utmost importance. Patients should be provided a copy of the [survivor bill of rights](#).

Safety Planning

As part of assessment, staff should help the patient build a safety plan if they are at risk for trafficking, currently in a trafficking situation, in the process of leaving the trafficking situation, or has recently left the trafficking situation. According to the NHTRC, a successful safety plan will:

- Identify and assess current and potential safety concerns
- Create strategies for avoiding or reducing harm
- Outline concrete options for responding when safety is compromised

4. Personalized, confidential discharge and referral processes

When discharging a patient who is in a suspected or confirmed human trafficking situation, it is important to keep them as safe as possible given their circumstances. Harm Reduction principles can help adapt clinical discharge protocols to patients' needs. Additionally, it is important to ensure that a patient is not unintentionally endangered by documentation or discharge practices. Risks during discharge include:

- Documentation of anything related to human trafficking on discharge printouts (except for the hotline number if it is included on discharge printouts for all patients)
- Documentation of anything related to human trafficking in the electronic health record *unless* the notes are blocked in accordance with the 21st Century Cures Act program rule on [Interoperability, Information Blocking, and ONC Health IT Certification](#)
- [Human Trafficking Hotline Business Card](#)

Referral

Determining the appropriate steps for referral begins with an assessment of readiness and the potential need for mandatory reporting for the survivor you are engaging with.

For minors:

Please refer to the Pediatric Tool Kit for Mandated Reporting of Minors experiencing suspected human trafficking for more detailed information.

For adults:

Assessing readiness and safety are the first steps in determining referral options for adult survivors. Staff are always welcome to contact the Southwest Ohio Human Trafficking Hotline to discuss questions or concerns in determining next steps with discharge.

If the survivor is interested in connecting to resources, finding a place to stay, getting treatment, reporting to law enforcement, and/or getting any kind of support, please encourage that individual to contact the Southwest Ohio Human Trafficking Hotline or call the hotline with the client. We can walk through options and determine the next best steps for coordinating a response, whether it is responding on-site to discuss options, or coordinating a plan for response after discharge.

If you are unsure if the survivor is ready for engagement with services, you are always welcome to provide the Southwest Ohio Human Trafficking Hotline for the individual to call at another time.

For situations where you are unsure what the next best steps are, you can always contact the Southwest Ohio Human Trafficking Hotline to discuss options and receive some technical assistance.

Confidentiality

Develop an institutional policy to offer staff guidance on maintaining confidentiality. The guidance should include information about how the Health Insurance Portability and Accountability Act of 1996 (HIPAA) may impact the ability to report human trafficking cases. When working with adults, it is important to gain the patient's consent before releasing any personal information to others, including service providers. When working with minors, it is important to get the guardian's consent before relating any personal information to resources. You do not need permission to release personal information in the setting of mandated reporting. See the Pediatric Tool Kit for Mandated Reporting of Minors experiencing suspected human trafficking.

Confidentiality is essential in providing quality services, protecting information, and maintaining relationships. Depending on the agency, there may be several elements of confidentiality to consider. Licensed professionals have their own set of regulations regarding confidentiality, as will each agency.

When considering a confidentiality policy for working with suspected victims of human trafficking, the agency should determine what information needs to be shared and with whom, including how referrals are made to The Salvation Army's Anti-Human Trafficking Program. Consult with agency administration on how to develop an appropriate protocol for maintaining confidentiality while referring and consulting with The Salvation Army's Anti-Human Trafficking

OPEN NOTES

Effective April 2021, federal rules require that all notes written by clinicians in electronic health records are available to patients. The Preventing Harm Exception allows notes to be blocked if they present additional risk to a patient. Hospitals should have a protocol in place for blocking notes in these situations.

Program. As long as structures are in place where each agency can be held accountable, patient confidentiality can be managed among varying agencies and across multiple disciplines, while still streamlining service access and ensuring a holistic response to the needs of the client.

5. Standardized reporting and documentation processes

Reporting

Call the Greater Cincinnati Human Trafficking Hotline, 513-800-1863, to report a suspected case of trafficking or receive consultation on next steps. Provide the patient with the local or national hotline number and encourage them to call if they want help or want to talk to someone.

If the patient feels it is dangerous to have something with the number written on it, consider having them memorize the number. Consider writing the number on a prescription pad or offer another discreet item with the hotline number on it.

In situations of immediate, life-threatening danger, follow institutional policies for reporting to law enforcement. Whenever possible, try to partner with the patient in the decision to contact law enforcement. See the Pediatric Tool Kit for Mandated Reporting of Minors experiencing suspected human trafficking.

Legal resources:

- [Legal Aspects of Human Trafficking for Health Care Professionals](#)
- [Mandatory Reporting of Human Trafficking](#)

Electronic Health Records

Ensure that any information regarding the patient's injuries or treatment is accurately documented in the patient's records. While documentation of abuse may be helpful in building a case against a trafficker, information about the victim can also be used against them in a court proceeding.

Resource: [Documenting ICD Codes and Other Sensitive Information in Electronic Health Records](#)

Coding

- Fact Sheet: [ICD-10-CM Coding for Human Trafficking](#)
- Watch: [The 21st Century Cures Act - Open Notes and Privacy for Human Trafficking Survivors](#)

Use the [Pediatric Toolkit](#) for pediatric patients.