


**DEPARTMENT OF HUMAN SERVICES  
SOCIAL SERVICES ADMINISTRATION  
311 WEST SARATOGA STREET  
BALTIMORE, MARYLAND 21201**

**DATE:** December 15, 2017

**POLICY #:** SSA – CW # 18-10

**TO:** Directors, Local Departments of Social Services  
Assistant Directors, Services

**FROM:** Rebecca Jones Gaston, MSW   
Executive Director  
Social Services Administration

**RE:** Identification, Reporting, Management and Training  
Related to Sex Trafficking Victims

**PROGRAM AFFECTED:** Child Protective Services/Family Preservation and  
Placement/Permanency Services

**ORIGINATING OFFICE:** CPS/Family Preservation Services

**ACTION REQUIRED OF:** All Local Departments

**ACTION DUE DATE:** January 1, 2018

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**PURPOSE:**

The purpose of this policy is to provide guidance to child welfare staff related to responsibilities for the identification, reporting, management and training regarding child sex trafficking victims to bring Maryland into compliance with the Federal Preventing Sex Trafficking and Strengthening Families Act. This policy addresses sex trafficking in all child welfare service delivery areas not just as it relates to Child Protective Services.

**BACKGROUND:**

The Preventing Sex Trafficking and Strengthening Families Act, enacted in 2014, amends the Child Abuse Prevention and Treatment Act (CAPTA), which provides funding for Maryland's Child Protective Services (CPS) program. To receive federal funds, states must be in compliance with CAPTA, which was amended to mandate: **the development and implementation of policies and procedures related to identifying victims of sex trafficking; reporting to law enforcement, training for Child Welfare staff; reporting missing and runaway youth served by Child Welfare; collecting data related to child sex trafficking; and screening runaway children served by child welfare for both victimization and risk of victimization related to sex trafficking.** Children known to the child welfare system are the population most vulnerable to involvement in sex trafficking and being targeted by traffickers. Statistics show that 80 to 90% of trafficking victims report child welfare involvement. As a result, it is critical for child welfare staff to know how to identify victims of sex trafficking or those at risk, and to make referrals to appropriate and available services.

**ACTION:****Service Delivery to Runaway Children:**The Case Worker:

The tasks set forth in this policy will vary depending on the type of child welfare service the child is receiving from the local department of social services (LDSS).

- Out of Home Placement: If a child runs away from out-of-home placement or during a trial home visit, the LDSS out-of-home worker will complete the tasks set forth in this policy, including completing required documentation, and ensuring that the runaway is reported to law enforcement as required by the policy on Runaway-Missing or Abducted Children;
- Child Protective Services: If the local department has an active Investigative or Alternative Response when the child runs away, the CPS worker will complete the tasks set forth in this policy, including completing all necessary documentation, and ensure that the runaway is reported to law enforcement;
- Family Preservation Services: If the child runs away while receiving Family Preservation services, the Family Preservation worker will complete the tasks set forth in this policy, including completing all necessary documentation, and ensure that the runaway is reported to law enforcement; and



- If there is more than one active child welfare service being provided to the child, the appropriate service staff will conduct a meeting to determine which worker is responsible for the tasks set forth in this policy. Documentation of the meeting, the participants, and the decision should be documented in MD CHESSIE under Contacts.

#### Runaway Children:

As soon as the child is reported missing, the LDSS caseworker must complete the following tasks:

- Ensure that the missing child has been reported to the local police. Local police **must** take a police report as both federal and state law prohibit law enforcement from declaring a waiting period before accepting a report of a missing minor; document the complaint number in the MD CHESSIE in the File Cabinet; obtain a copy of the police report and scan it for placement into the MD CHESSIE File Cabinet;
- Obtain as much information as possible about the child to share with all authorities searching for the child. Such information includes the most current photo of the child; a comprehensive description of the child, including what the child was wearing when last seen; any information regarding where the child might be; a list of places frequented by the child; and any relevant information available on social media;
- Report the missing child to the National Center for Missing and Exploited Children (NCMEC) in accordance with federal law. A missing child report may be completed on the NCMEC website: **cmfc.missingkids.org**, or by calling **1-800-THE LOST**. When the child is not in agency custody, the worker should complete this process in consultation with the parent or legal guardian. After the NCMEC report is complete, it should be printed, scanned and uploaded into the MD CHESSIE File Cabinet; and
- Document the child's living arrangement in MD CHESSIE as "runaway" until the child is located. The worker should do a new Safe-C indicating the child is on runaway status and the safety plan, (if appropriate) should address efforts to locate the child. Upon return, another Safe-C should be completed.

For further information, the Maryland statute addressing missing children can be found under Md. Code Ann., Fam. Law, title 9, subtitle 4.

#### Returned Children:

When a child has been located or has returned:

- Notification:
  - The LDSS worker must notify the local police and NCMEC when a runaway child has been located.
  - The LDSS worker must change the Living Arrangement in MD CHESSIE from “runaway.”
- Screening:
  - As soon as possible after any runaway child is located, the worker **must** screen the child for trafficking using the designated screening interview tool found in Appendix I. (Until the tool is added to MD CHESSIE, the worker should use the paper form to complete the sex trafficking screening.)
  - Depending on the relationship the worker has with the child and the child’s level of cooperation, the worker may need more than one interview to discuss the runaway incident and to gather information necessary to identify trafficking or the risk of trafficking;
  - The effectiveness of the tool depends on a sensitive approach that includes building trust; ensuring safety; and meeting the potential victims’ legal, social, and health needs;
  - The information the child provides should be documented on the Child Sex Trafficking Screening Interview tool;
  - When completed, the worker should scan the tool and upload it into the MD CHESSIE File Cabinet; and
  - The reporting and screening of a child must be completed **every** time a child runs away or returns.

#### Children Identified as Trafficking Victims:

- All Child Welfare workers need to be alert to the signs of trafficking and use the screening tool whenever there is reason to believe a youth may be involved in, or is at risk of, trafficking.
- CPS Report: If a worker has identified a youth as a trafficking victim, whether by disclosure, as a result of the answers on the screening tool or otherwise, he or she must report the information to the appropriate Child Protective Services Screening unit to document the information in MD CHESSIE as CAPTA requires States to report out on **all** trafficking cases.
- If the worker cannot identify a specific jurisdiction where the trafficking occurred, the worker should make a report to the local department in the jurisdiction where the youth resides. (See the most recent policy on Human Sex Trafficking Victims)
- Even if the worker cannot identify a trafficker or the child appears not to have had a pimp (*e.g.*, a child appearing to have been soliciting without a trafficker), the worker should make a report to the CPS Screening unit. Consistent with federal requirements and Maryland statute, a child who has been involved in a commercial sex act is considered a victim of child sexual abuse/human trafficking.
- Individuals who are age 18-21 and who are receiving child welfare services who have been identified as a trafficking victim should be reported to the appropriate screening unit. The



- screening unit should record the information and indicate “sex trafficking” on the referral but screen out the referral as the youth is 18 or over. This is to ensure that data regarding **all** victims known to child welfare be collected.
- If a worker has reason to believe that trafficking has occurred but does not have enough information to warrant a CPS investigation, the information can be accepted as a Risk of Harm case. The screener should mark the referral as a human sex trafficking of a youth, then override the decision on the SDM screen to create a Non-CPS referral and assign the referral for an assessment.

Children Identified as Being at Risk of Trafficking Through Use of the Screening Tool:

- If a worker identifies a child to be “at risk” of trafficking through the screening tool, the child may benefit from further discussion.
- The worker can contact any of the current providers currently contracted by the Department of Human Services (DHS) to serve sex trafficking victims or victims of sexual assault to request that a staff member conduct an in-person interview with an “at risk” child;
- If a staff member from one of these organizations is not available to conduct an in-person interview, the LDSS worker may be able to discuss the situation with a staff member to gain additional insight and advice;
- The LDSS caseworker should assess children identified as “at risk” for the need for mental health intervention if the child is not currently in treatment. Suspicions of trafficking should be shared with current therapists.
- When referring children for therapy, request information from the therapist about the therapeutic modality the therapist is recommending. When a trauma screening indicates a need for intervention, trauma certified therapists are best qualified to work with trauma victims. Motivational interviewing is recommended for trafficking victims;
- All services delivered to a child should be documented in the Service Log in MD CHESSIE;
- The worker should alert parents/caregivers of the possible risk of trafficking and advise them of what to look for and how to report any suspicions;
- Taking into consideration the child’s developmental level, ability to process information, and willingness to participate, the worker should have a thoughtful and honest discussion with the child and provider or family regarding the dangers of trafficking, the dangers related to grooming by possible traffickers (e.g. posing as “boyfriends”), of the information regarding how traffickers manipulate children to gain their trust, and the importance of the child having a trusting adult with whom the child can talk further about valuing their sexual boundaries and related issues.

**Safety Planning:**

- The worker should discuss safety planning with the child and the child’s parent or caregiver for any child who has a history of running away.
- The purpose of the safety planning is to assure that the child has positive strategies and coping skills to be employed during times of distress as an alternative to flight.
- The triggers for running away should be identified and, whenever possible, addressed with the caregiver, with the youth’s safety being paramount.
- The plan should address the triggers that caused the child to run and the actions that can be taken to support the youth in employing alternative strategies and coping skills.
- Documentation of the safety planning document should be scanned into the File Cabinet and conversations that took place to complete the plan should be documented in Contacts.

**Training of Child Welfare Staff:**

All Child Welfare staff are required to complete a two-part training on sex trafficking.

- This mandatory training will eventually be added to the core training curriculum for all new Child Welfare staff.
- In cooperation with the University of Maryland Child Welfare Academy, DHS will track all attendees and report attendance to local jurisdictions.
- Local jurisdictions will be responsible for ensuring that all staff attends the training.
- Data on staff training will be reported as required by CAPTA.



APPENDIX I

CHILD SEX TRAFFICKING (CST) SCREENING INTERVIEW  
Tier One

CHILD'S NAME: \_\_\_\_\_

NICKNAME: \_\_\_\_\_

DOB: \_\_\_\_\_ AGE: \_\_\_\_\_ RACE: \_\_\_\_\_

GENDER:    Female    Male    Transgender Female     Transgender Male

CPS/Family Preservation Services     Out of Home Placement Services

INTERVIEW DATE(S): \_\_\_\_\_

SCREENING TOOL COMPLETED: \_\_\_\_\_ YES    \_\_\_\_\_ NO

Directions: Staff completing this tool should have a conversation with the child, as soon as the child returns from runaway *or* when the worker suspects that trafficking may be an issue, and elicit information from the child on each of the questions listed below. While there is a need to address all of the questions, *this should not be completed as a questionnaire but used as a guide for having a conversation with the child.* Results of the **conversation** MUST be recorded on this form which needs to address each of the questions listed: (1) Indicate if the child does not respond after prompting; (2) Be aware of the attitude and demeanor of the child during the discussion and record observations at the completion of the discussion(s); and (3) Let the child guide the amount of information he/she feels comfortable providing. The worker needs to create an environment so that the child can feel comfortable during the conversation and know that the worker is interested in trying to get a better understanding of what is going on with the child. This conversation may need to take place over several visits. Once the worker has covered all of the topics, the tool must be completed and scanned into the MD CHESSIE File Cabinet. If trafficking is disclosed, the worker must report the trafficking to the appropriate CPS Screening unit.

The contents of the tool should be shared with the worker's supervisor. The supervisor should review and discuss with the worker the outcome of the screening and ensure that the tool has been used correctly and that the outcome reflects the current status of the child.

*If the child has runaway at any time, all questions under (1) and (2) should be addressed. If the child is not a runaway, but the worker is concerned that trafficking may have occurred or is currently occurring, the worker can skip to the questions under 2.*

1. Have you ever run away or left home or foster care?  YES  NO

**If YES, ask the following questions:**

- 1a. About how many times? (If child has difficulty, ask if only 1 time, 2-3 times, 4-6 times, 7-10 times, more than 10)

**If child reports running away 3 or more times, check CST Risk Factor box**

- 1b. How long do you usually stay away? (If child has difficulty, ask 1-2 days, 3-5 days, 7 days, more than 7 days)
- 1c. Can you tell me more about what made you leave?
- 1d. How do you take care of yourself while away?
- 1e. Can you tell me what you did when you needed food, clothing, shelter, a ride, and etc. while you are away from home/foster home? Did you have friends who helped you with these things?
- 1f. Where did you spend the night while you were gone?

**If child reports staying in a hotel/motel, at a boyfriend/girlfriend's home, or on the street, check CST Risk Factor box**

- 1g. Who else was staying there with you?
- 1h. Did you feel safe there?
- 1i. Does child indicate staying with anyone?  YES  NO

**If YES, ask the following questions:**

- 1j. Can you tell me about who you were staying with and what your relationship is to them?
- 1k. While you were away from home/foster home, did anything keep you from going back? Examples might include being afraid of getting in trouble, something wrong at home, didn't have transportation home, etc.

2. Do you have a special person in your life, boyfriend, girlfriend?  YES  NO

**If YES, ask the following questions:**



2a. Can you tell me about this person? Is this person your age or older?

2b. If older ask: How much older? (If 4 or more years difference, this is a risk factor.)

If child reports having a romantic partner who is 4+ years older, check CST Risk Factor box

2c. What do you like about this special friend?

2d. Does he/she give you nice things, takes you places, do special things for you?

YES  NO

If child reports yes, check CST Risk Factor box

2e. Has anyone asked you to do anything that has made you feel uncomfortable in exchange for something that you needed? (ex: food, shelter, clothing, water, a ride)

YES  NO

If child reports yes, check CST Risk Factor box

2f. Do you have any tattoos?  YES  NO

**If YES, ask the following question:**

2g. What is your tattoo of and what does it/they mean to you?

If child has a tattoo related to a romantic partner, gang, or involvement in prostitution, check CST Risk Factor box

2h. Have you had contact with the police in the last year?  YES  NO

**If YES, ask the following questions:**

2i. In what cities/states did this contact occur?

2j. Did the contact with the police result in an arrest?  YES  NO

**If YES, ask the following questions:**

2k. What was the arrest for?

If child reports having police contact for prostitution or related charges (loitering, trespassing, drug offenses, shoplifting, solicitation) or police contact in multiple cities or states , check CST Risk Factor box

\*NOTE: If child who is AWOL is picked up by police, request a copy of the police report and gather details of how police came into contact with child.

2l. We've talked about some possibly difficult topics in your life. What are a few of your hopes for the future?

\*NOTE: Worker should review social media profiles of child to determine whether the child has posts that are indicative of trafficking activities.

Number of **CST Risk Factor boxes** checked:  out of 8 Risk Factors

If the worker has checked **3 or more CST Risk Factor boxes**, the worker should consider the child at risk of being a human trafficking victim.

If child discloses experiencing **any** trafficking including both pimp controlled or engaging in any commercial sex act (prostitution, trading sex for food/shelter/transportation/etc., stripping, or pornography), worker must report all sex trafficking to CPS in the jurisdiction or state in which it occurred.

1. Did child disclose being trafficked?     YES     NO
2. Was a report made to CPS?     YES     NO
3. Based on the conversation/screening with child worker identified risk factors and recommends additional screening?     YES     NO
4. Has a referral for services been made?     YES     NO
5. What belongings did the child have when they returned from runaway?  
(ex: clothing, money or credit/gift cards, cell phone/electronics, jewelry)

Below, please note any concerns as well as child's attitude and demeanor throughout the discussion(s).