PUBLIC RESPONSE TOOLKIT *for the*

FEDERAL STRATEGIC PLAN FOR SERVICES TO VICTIMS OF

HUMAN TRAFFICKING IN THE UNITED STATES

The US government has introduced a draft **Federal Strategic Action Plan for Services to Victims of Human Trafficking in the US** (“the Plan”). The public is invited to comment on the Plan; these comments and ideas will be read and considered by the US government for inclusion in the final draft of the Plan. There have been very few comments so far. We need to tell the government that demand, services to adult victims, and survivor input are priorities. **Let your voice be heard!**

**How to Comment**

The Comment page for the Federal Strategic Action Plan for Services to Victims of Human Trafficking in the United States (“the Plan”) can be found here: <https://acfstrongertogether.ideascale.com>

The link to the full Plan can be found here: <http://www.dhs.gov/blog/2013/04/09/working-together-support-victims-human-trafficking>

There are five categories open for public comment. Below are the five categories with **draft responses** for your consideration. Individuals and organizations are in no way tied to these suggestions but can modify or draft their own. **This is simply intended as a tool to make it easier for organizations that may not have the time or staff to review the Plan – please feel free to use your own words.** There is very little focus on demand (buyers of sex) in the Plan, including demand facilitated over the Internet and social media, services for adult victims, or survivor input which we are hoping to highlight through these comments. The suggested comments were submitted by organizations and individuals working to end demand; they are not in any particular order.

The online public comment page allows you to **submit** ideas, **agree** with existing ideas, or **add comments.** You can select one or more of the ideas below or post your own. You will be asked to add a title and choose a campaign (one of the five categories) for the new idea. You will also have the option to add **tags** to the idea.

The **tags** highlight for the government the **priority concerns** – please make sure you tag your comments with: **demand, services to adult victims,** or **survivors.** Other tags you may consider using include: Internet Service Providers (ISPs), training, victim identification, law enforcement training, DOJ training and technical assistance, John Schools, sex buyers, accountability, etc.

**Please post your comment no later than 23 May 2013,** the Comment period ends *early* 24 May.

**More Information**

For those that want more information: the Department of Health and Human Services is holding two national briefing calls on Monday, May 13 that will provide a background on the Strategic Action Plan, the public comment process and a moderated question and answer session.

Times: 10 am – 11:00 am EST and 2:00 pm – 3:00 pm EST.

Call in number: (888) 324-9242, Passcode: “Trafficking”

**Letter to the President**

In addition to the public comments, we are drafting a letter that states priority concerns to President Obama, and to the Departments of Homeland Security, Justice, and Health and Human Services. We will be sending you a draft of the letter on Monday May 13th and hope to have as many organizations as possible (hopefully 100 or more) sign on to the letter; we hope you will add your name and organization.

If you have any questions, you can contact Shelby Quast at [squast@equalitynow.org](mailto:squast@equalitynow.org), 202 841-5630

**CAMPAIGNS: draft comments**

1. [What actions should be prioritized?](https://acfstrongertogether.ideascale.com/a/ideafactory.do?id=23150&mode=recent&discussionFilter=byids&discussionID=45217)

* Law enforcement must investigate and prosecute facilitation of human trafficking and the sale of commercial sex over the Internet and via social media. Department of Justice must hold facilitators and Internet Service Providers (ISPs) accountable.
  + *Tag:* ***Demand****, Internet, Internet Service Providers*
* Build capacity and training among educators, faith based groups, businesses, hospitality, tourism and transportation industries, and health care providers to better identify sex buyers and those that facilitate demand, including discussing sex buyers from within these groups, and how to engage with law enforcement.
  + *Tag:* ***Demand****, buyers*
* Highlight role of demand in promoting human trafficking in all training programs and materials.
  + *Tag:* ***Demand****, training*
* Help local law enforcement change emphasis away from arresting prostituted people, toward the sex buyers who fuel the commercial sex industry.
  + *Tag:* ***Demand****, DOJ training and technical assistance*
* The demand for people in prostitution drives the sex trafficking industry. Vulnerable girls and women are targeted to fill the demand. Strategies need to focus on how to increase awareness and protection for those vulnerable populations while also strategizing about how to change the attitudes and actions of boys and men who are willing to exploit and objectify children and girls.
  + *Tag: Training,* ***Demand***
* Trafficking survivors must be included as experts in decision-making processes. While the Strategic Action Plan mentions survivors – a critical distinction must be made between USING survivors and bringing them to the table as equal partners in the decision-making process. Anything less reinforces the hierarchical structures and exploitative practices that have kept sex trafficking victims silent and unseen.
  + *Tag:*  ***Survivors***
* The Strategic Action Plan should emphasize that many sex trafficking victims are over 18 and need access to services. Adult victims cannot be left out of the Strategic Action Plan.
  + *Tag:* ***Services for Adult victims***
* Understanding the mechanism of human trafficking is not possible without an increased understanding of prostitution as the end-point of sex trafficking. Training and guidance should emphasize prostitution prevention through sustained and effective anti-patronizing measures and diversion programs for at risk youth.
  + *Tag:* ***Demand****, training*

2. [What areas, gaps, or needs are not sufficiently addressed by the Plan?](https://acfstrongertogether.ideascale.com/a/ideafactory.do?id=23150&mode=recent&discussionFilter=byids&discussionID=45218)

* The level of prostitution activity in a jurisdiction is a much better indicator of the amount of trafficking activity in the jurisdiction when compared to the data currently being described as “trafficking statistics”. Therefore, data collection mechanisms should include state-by-state statistics on arrests and convictions for promoting prostitution, patronizing prostitution and related crimes such as crimes associated with violence against women. The existence and range of sex businesses including online businesses should also be documented, as they are an indication of organized crime activity as well as the increase of trafficking.
  + *Tag:* ***Demand****, statistics, ISPs*
* Increase research and training on the subtleties of force, fraud, and coercion. Research and extensive training for a range of professionals should be required and include the following: Why a victim may not self-identify as a victim, may not want to cooperate with law enforcement or may want to protect their traffickers/pimps.
  + *Tag: Training, definitions*
* To remove barriers and improve access to housing, shelters and centers, the federal government should provide funding for obtaining and staffing of facilities that provide services exclusively for victims of human trafficking.
  + *Tag:* ***Survivors****, services*
* Cooperating with law enforcement should not be a condition for trafficking victims to receive services.
  + *Tag:* ***Survivors****, services*
* Convictions for prostitution and/or related crimes should not serve as a bar to receipt of federal housing or assistance for housing (nor should it be a bar to receipt of student loans or any other government programs and benefits).
  + *Tag:* ***Survivors,*** *services*
* The provisions of previous Trafficking Victim Protection Reauthorization Acts must be met by the State Department, Department of Justice and other agencies. We must hold those accountable who have not implemented the programs and/or initiatives that have been mandated by legislation.
  + *Tag: Accountability, implementation*
* Training of law enforcement should be a priority; they are the frontline of defense for the defenseless if they are aware and sensitive to the needs of the victims.
  + *Tag: Training*
* A strong Trafficking in Persons (TIP) office and TIP ambassador are essential to maintain the effectiveness of anti-trafficking efforts.
  + *Tag: TIP Office*
* Strengthen federal collaboration and guidance by developing standard terminology. Because various states have defined trafficking differently, training must address state definitions as these are the primary consideration of state and local agencies. Therefore, to make federal training more relevant, the Department of Justice should urge all states to include at a minimum those elements in their state trafficking laws that constitute trafficking under the Trafficking Victims Protection Act.
  + *Tag: Definitions, TVPA, training*
* Training of law enforcement organizations should emphasize prostitution prevention and diversion programs. Training must be specific to the statutes in the jurisdiction where the training is occurring. All state law enforcement agencies that provide professional certification to newly hired law enforcement officers, deputy sheriffs and similar titles should develop and implement a training module which includes effective practices to respond to prostitution and trafficking and a condensed lesson on police operations and investigation techniques to combat demand.
  + *Tag:* ***Demand****, police, training*
* Urge every prosecutor’s office and law enforcement agency with more than 50 sworn personnel to have an officer trained specifically in responding to international victims of human trafficking and in particular, the statutes and regulations for T and U visas. For smaller jurisdictions, a federal employee should be specifically designated as the T and U visa specialist contact for local law enforcement agencies.
  + *Tag: Visas, training*

3. [What promising practices can be continued or emphasized?](https://acfstrongertogether.ideascale.com/a/ideafactory.do?id=23150&mode=recent&discussionFilter=byids&discussionID=45219)

* Federal agencies should integrate survivor experiences and input by creating fellowships or paid internships for trafficking survivors. This would provide for a consistent stream of survivor input, empower survivors and create new leaders for the anti-trafficking movement who have knowledge of government processes.
  + *Tag:* ***Survivor input, survivor empowerment***
* Raise awareness of and enforce Zero Tolerance policies and laws against human trafficking and procurement of commercial sex. Each organization or agency should develop clear human resource policies that federal employees, law enforcement and defense contractors cannot procure commercial sex at any time. These policies should be publically available and strictly enforced. Policies should be part of employment contracts.
  + *Tag:* ***Demand****, zero tolerance,*
* When awarding anti-trafficking contracts, federal agencies should give preference to survivor-led organizations just as preferences are given to veteran-led organizations.
  + *Tag:* ***Survivors***
* Survivor-led organizations should be at the table for all federal meetings that include stakeholders.
  + *Tag:* ***Survivors***
* The International Trafficking Hotline should include survivors, as paid staff, who are available to answer calls from sex trafficking victims.  Survivors provide a level of trust to victims that allow them to more easily accept help or give information that can connect victims with services. It is a missed opportunity to not include survivors on this hotline.
  + *Tag:* ***Survivors***
* Identify and make available targeted human trafficking screening tools for use by school personnel.
  + *Tag: Schools, training*
* Expand the development of education materials to comprehensively implement a nationwide curriculum to prevent commercial sexual exploitation. This curriculum should include a module on preventing demand. The Department of Education, relevant Department of Justice agencies and the Center for Injury and Violence Prevention at the Center for Disease Control should convene an expert working group that includes survivors to conceptualize and coordinate the educational curriculum. These experts should provide lessons learned from the development and implementation of other prevention curricula and practices implemented in schools and other education settings.
  + *Tag:* ***Demand****, Schools, screening tools*
* Support advanced training to law enforcement personnel and guardians ad litem assigned to assist victims in accessing the benefits and services available to trafficking survivors under federal and state statutes and regulations.
  + *Tags: Training, law enforcement, victims*
* The tier ratings in the Trafficking in Persons report must continue to be reliable and anti-trafficking efforts must be effectively evaluated and reflected in the tier rating of the various countries. Weakening the reliability of those ratings would weaken the whole anti-trafficking movement and set anti-trafficking efforts back dramatically.
  + *Tag: TIP report, tier rating*

4. [What additional partnerships or collaborative efforts are needed?](https://acfstrongertogether.ideascale.com/a/ideafactory.do?id=23150&mode=recent&discussionFilter=byids&discussionID=45220)

* Expand the Transportation Leaders Against Human Trafficking partnership to include associations that represent the hospitality, restaurant, tourism and trucking industries or create a parallel structure for these industries. Develop and conduct training programs for these audiences to include prevention and combating demand.
  + *Tag: Partnership*
* Collaboration with faith-based and community based organizations should emphasize their role in reducing demand. Because these organizations already have a membership that shares common beliefs, messages that emphasize how demand creates trafficking might be exceptionally effective as well as addressing the role of demand from within faith-based communities and other NGOs.
  + *Tag:* ***Demand****, Faith-based*
* The capacity of service providers to engage other partners would be enhanced by the inclusion of school employees. As the average age of entry into prostitution is approximately 13 years, school teachers, assistants, aides, administrators, nurses, social workers, psychologists and school resource officers will be among the first to notice excessive absences, behavioral changes and signs of abuse.
  + *Tags: Schools, identification of victims*
* Engage business, NGOs and philanthropic organizations to encourage development of zero tolerance policies with regard to human trafficking and procurement of commercial sex.
  + *Tag:* ***Demand****, zero tolerance*
* Enable a system for shadow reports from NGOs, survivor groups, service providers and individual experts to highlight gaps and challenges and provide ongoing oversight for effective implementation of this Plan.
  + *Tag: Accountability*
* Include educational institutions in efforts to increase victim identification. This could be accomplished not only by inclusion in trainings but also requiring that any school district that receives federal funds designate and train a staff member in all school venues that can serve as a resource for trafficking identification with a focus not only on victims but on perpetrators and on the "education" that young boys receive about prostitution via online materials.
  + *Tags:* ***Demand****, schools, training, ISPs*
* Require that state curriculums for health and or sex education include a unit on the dangers of, and links between, prostitution and trafficking.
  + *Tags: schools, health professionals, victim identification, training*
* Require, as a condition of certification, that all teachers, administrators, school nurses, psychologists, social workers and attendance officers, successfully complete an approved course in recognizing human trafficking.
  + *Tag: schools, victim identification, training, staff, federal funding*
* Addressing human trafficking on school campuses should include demand. The human resources policies of schools that receive federal funding should clearly state as a condition of employment that school employees cannot procure commercial sex.
  + *Tags:* ***Demand****, schools, human resources*
* Increase partnering with medical, public health, and social sciences and applied mental health academic programs and related professional associations to increase training for health professionals on identifying and meeting the needs of human trafficking victims.
  + *Tags: Schools, health professionals, victim identification, training*
* Cooperative efforts across the political spectrum should be revitalized.
  + *Tag: Political cooperation*
* Anti-trafficking efforts must be anchored in the reality of survivors’ experiences and knowledge.
  + *Tag:* ***Survivors***
* To enhance the level of research relating to demand, the relevant federal research agencies including the National Institute of Justice, National Institute of Health and other agencies involving mental health and education should convene an expert group of advisors, including survivors, to encourage more robust research on preventing and deterring demand. This would reduce the silos between researchers and practitioners and lead to greater research to practice solutions. More rigorous program evaluation would also be a beneficial outcome.
  + *Tag:* ***Demand,*** *research*
* Address need for education and rehabilitation of sex buyers.
  + *Tag:*  ***Demand****, John School*
* Many survivor-led organizations are experts in the areas of prevention, demand, and services to victims. If this Strategic Plan is to be effective, survivor-led organizations must be included as partners in the process.
  + *Tag:* ***Survivors***

5. [General comments](https://acfstrongertogether.ideascale.com/a/ideafactory.do?id=23150&mode=recent&discussionFilter=byids&discussionID=45322)

* Requiring a person in prostitution to “prove” she/he is a sex trafficking victim creates an additional layer of stigma that further marginalizes these victims and causes harm. The federal government should not be doing anything that may worsen the prognosis of sex trafficking victims’ abilities to recover and live meaningful, productive lives.
  + *Tag:* ***Survivors***