



**WORKING TOGETHER
TO PROTECT
EXPLOITED CHILDREN**

Model Interagency Protocol Framework

The Model Interagency Protocol Framework (“Model Framework”) incorporates the legal requirements of the CSEC Program as set forth in statute, including the required participants and the mandatory multidisciplinary approach. It also provides further guidance that counties may utilize on promising practices for serving commercially sexually exploited children (“CSEC”) based on research both within and outside of California. It is expected that this guidance, although not required by law, will be beneficial for both the systems and the youth they serve.

The Model Framework below provides details on creating a *Steering Committee*, forming *Multidisciplinary Teams* (“MDT”) for each identified victim of commercial sexual exploitation, and preparing county agencies and their partners to better serve CSEC through a coordinated manner.

Model Interagency Protocol Framework

I. Participants

a. Required:

- i. Child Welfare
- ii. Probation
- iii. Mental Health
- iv. Public Health
- v. Juvenile Court
- vi. Substance abuse

b. Suggested:

- i. Education
- ii. Children’s Dependency Attorneys
- iii. District Attorney
- iv. Public Defender
- v. Law enforcement
- vi. Survivors
- vii. CSEC-trained advocates/case managers
- viii. Community-based organizations
- ix. Court Appointed Special Advocates (CASAs)
- x. Direct service providers

II. Purpose

Establish a coordinated, interagency response among county agencies and partners to ensure commercially sexually exploited children (“CSEC”) and children at risk for exploitation are identified and served through a multidisciplinary teaming approach.



III. Guiding Principles

- a. Commercial Sexual Exploitation:
 - i. Must be understood as abuse and reported as such¹
 - ii. Should not be criminalized
- b. Responses to CSEC should be:
 - i. Victim-centered²
 - ii. Trauma-informed³
 - iii. Strengths-based
 - iv. Culturally, linguistically, and LGBTQ competent and affirming
 - v. Committed to efforts that engage CSEC early and often
 - vi. Multidisciplinary, individualized, flexible, and timely
 - vii. Data and outcome driven
- c. Agency Policies & Procedures should:
 - i. Ensure and track effective cross-system collaboration at the system and individual-case level
 - ii. Incorporate mechanisms to identify and assess CSEC at key decision points
 - iii. Address the unique physical and emotional safety considerations of CSEC
 - iv. Address unique physical and emotional safety considerations, including vicarious trauma of staff, caregivers, and other relevant support persons

IV. General Structure and Responsibilities For All Agencies

As stated above, the structure defined below combines both required and suggested participants and responsibilities. For example, in order to participate in the CSEC Program, a county must develop an interagency protocol led by five required entities: child welfare, probation, mental health, public health, and the juvenile courts.⁴ The CSEC Action Team recommends that the required and suggested agencies form a steering committee to develop the protocol as well as fulfill additional responsibilities (not required) to ensure the program is effectively administered in the county. Similarly, the law requires counties participating in the CSEC Program to utilize a multidisciplinary approach, but does not delineate specific requirements of the MDT approach. This Model Framework suggests that an MDT be formed for each individual child and that additional parties be included in the teams

¹ Cal. Penal Code §§ 11164-11174.3.

² See Appendix (attached).

³ See Appendix (attached).

⁴ Cal. Welf. & Inst. Code § 16524.8



a. Steering Committee

- i. *Purpose:* Provide ongoing oversight and support to ensure the county agencies and partners effectively collaborate to better identify and serve CSEC and youth at risk of becoming CSEC.
- ii. *Responsibilities:*
 1. Develop Interagency Protocol (“Protocol”)⁵
 2. Provide input to the county on how to utilize CSEC Program funding⁶
 3. Implement the Protocol, oversee implementation, and revise as needed
 4. Collect and analyze aggregate data related to the Protocol⁷
 5. Assess the sufficiency of CSEC specific resources in the county
 6. Identify training needed (e.g. basic identification and awareness training and training on responsibilities under the interagency protocol) and ensure necessary training occurs
 7. Provide annual report to state on the number of children served, the services received, promising practices, and any identified gaps in services and resources⁸
- iii. *Membership:*
 1. Required:⁹
 - a. Child Welfare – Lead
 - b. Probation
 - c. Mental Health
 - d. Public Health
 - e. Juvenile Courts
 - i. Suggested to include both dependency and delinquency
 2. Suggested:
 - a. Children’s Dependency Attorneys
 - b. District Attorney
 - c. Public Defender
 - d. Survivor mentors/advocates
 - e. County Counsel
 - f. Direct legal and service providers

⁵ Cal. Welf. & Inst. Code § 16524.8 (requiring that a county electing to participate in the CSEC program develop an interagency protocol. The interagency protocol for serving commercially sexually exploited children must be developed by “a team led by a representative of the county human services department and shall include representatives from...the county probation department, the county mental health department, the county public health department, the juvenile court in the county. The team may include, but shall not be limited to, representatives from local education agencies, local law enforcement, survivors of sexual exploitation and trafficking, and other providers as necessary.”).

⁶ Cal. Welf. & Inst. Code § 16524.7(d)(1); Cal. Dept. of Social Svcs., All County Letter 14-62, Sept. 3 2014, Commercially Sexually Exploited Children (CSEC) Program available at <http://www.dss.cahwnet.gov/lettersnotices/EntRes/getinfo/acl/2014/14-62.pdf>.

⁷ Cal. Welf. & Inst. Code § 16524.10 (requiring that the state report to the legislature on the number of children served and the types of services provided); Admin. of Children Youth & Families, ACYF-CB-IM-14-03, October 23, 2014 available at <http://www.acf.hhs.gov/sites/default/files/cb/im1403.pdf>.

⁸ *Id.*

⁹ Cal. Welf. & Inst. Code § 16524.8(a) (mandating that Child Welfare, Probation, Mental Health, Public Health, and the Juvenile Courts be involved in developing the interagency protocol).



- g. Education
- h. Law enforcement
- i. Staff/administrative support¹⁰

iv. *General Participant Responsibilities:*

1. Appoint director of agency/entity/organization or designee empowered to make decisions on behalf of the entity to participate in committee¹¹
2. Attend regularly and participate collaboratively in committee
3. Report on successes, barriers to providing services, and areas for improvement, including recommendations for adapting the Protocol and training needs/gaps
4. Provide aggregate data on identified CSEC

b. Multidisciplinary Teams (MDTs)¹²

- i. *Purpose:* Provide a multidisciplinary team with CSEC training to each identified CSEC to more effectively build on a youth's strengths and respond to his/her needs in a coordinated manner.¹³
- ii. MDTs should be convened:¹⁴
 1. Upon initial identification to meet immediate needs,
 2. Post-identification at regularly scheduled intervals for case review and management,
 3. When there is a need to change the case plan or placement due to a change of circumstances such as completing high school, identification of previously unknown service need, or safety concerns, and/or

¹⁰ Cal. Welf. & Inst. Code § 16524.7(a)(4)(D) (indicating that counties may decide to use a portion of the CSEC Program funding to hire “county staff trained and specialized to work with children who are victims of commercial sexual exploitation to support victims and their caregivers, and to provide case management to support interagency and cross-departmental response.” Additionally counties may choose to hire staff to provide administrative/staffing to support the steering committee and MDTs. Staff may provide assistance with items such as data collection, drafting reports, coordinating and scheduling meetings, and note-taking).

¹¹ In order for the steering committee to operate efficiently and expeditiously fulfill its responsibilities, members must have decision-making authority.

¹² Cal. Welf. & Inst. Code § 16524.8(b) (mandating that the interagency protocol *shall* include “the use of a multidisciplinary team approach to provide coordinated case management, service planning, and services to children.”) (emphasis added); *See* Cal. Welf. & Inst. Code § 18961.7(a-b) (noting that “Notwithstanding any other provision of law, a county may establish a child abuse multidisciplinary personnel team within that county to allow provider agencies to share confidential information in order for provider agencies to investigate reports of suspected child abuse or neglect made pursuant to Section 11160, 11166, or 11166.05 of the Penal Code, or for the purpose of child welfare agencies making a detention determination... ‘Child abuse multidisciplinary personnel team’ means any team of two or more persons who are trained in the prevention, identification, or treatment of child abuse and neglect cases and who are qualified to provide a broad range of services related to child abuse.”).

¹³ Given each county’s unique needs and constraints, some counties may choose to pilot the protocol in a small area of the county initially, or may choose to provide individualized MDTs to a specific subset of the identified CSEC. Note that maintaining some consistency amongst protocols throughout the state will be beneficial in that exploiters are known to move CSEC from county to county. Further, general consistency amongst county protocols will provide some level of familiarity with the process and hopefully allow children to feel protected and cared for as they interact with agencies in multiple counties.

¹⁴ While initial MDTs should occur in person, follow-up MDTs may be handled over the phone if an in-person meeting is not feasible. If the MDT is convened over the phone, one team member must be with the child to ensure he/she feels supported and his/her voice is heard.



4. In the event of a triggering event like a runaway or contact with law enforcement, as per the safety or other urgent circumstances necessitate.¹⁵

iii. *Responsibilities:*

1. Provide individual case-by-case collaboration with multiple child-serving agencies
2. Engage with child and family/caregiver(s), if appropriate
3. Ensure basic needs such as food, shelter, and clothing are met
4. Assess and address immediate and long-term needs¹⁶
5. Coordinate, monitor, and adjust service plan to achieve desired outcomes for individual CSEC
6. Advise on appropriate placement
7. Conduct safety planning to proactively plan for triggering events
8. Meaningfully involve youth in planning and decision-making

iv. *Membership*¹⁷

1. Required:¹⁸
 - a. Child Welfare
 - b. Probation
 - c. Mental Health
 - d. Substance abuse
 - e. Public Health
2. Suggested:
 - a. Youth¹⁹
 - b. Caregiver/placement provider
 - c. Children's Dependency Attorneys
 - d. Education
 - e. Local CSEC Provider Agencies
 - f. Survivors/mentors

v. *General Participant Responsibilities*

1. Appoint a lead agency responsible for convening the MDT

¹⁵ Other events that may require the MDT to reconvene may include, but are not limited to: runaways/AWOLs, change in placement, contact with law enforcement, mental health/psychiatric crisis, major disruption at placement, threats by trafficker, etc.

¹⁶ Will be defined in the "Holistic Needs of CSEC" document as part of the CSEC Practice Guidance Toolkit, (forthcoming May 2015).

¹⁷ Whereas the Steering Committee will be comprised of agency directors or their designees, the MDT will be made up of line staff, or those individuals working directly with the child. For example, the MDT members from each agency may include the case carrying social worker and probation officer, the child's mental health clinician, a public health nurse, and the child's substance abuse counselor—those individuals with the most information related to an individual child's case.

¹⁸ Cal. Welf. & Inst. Code § 16524.7(c)(1), (d)(2) (mandating that the multidisciplinary team include, but not limited to "Appropriate staff from county child welfare, probation, mental health, substance abuse disorder, and public health departments. Staff from a local provider of services to this population, local education agencies, and local law enforcement, and survivors of commercial sexual exploitation and trafficking may be included on the team.").

¹⁹ Youth's participation may vary depending on the youth's understanding of his or her exploitation. Efforts, however, must be made to include the youth at every stage of the case planning process to ensure the youth feels empowered and involved in decision-making. Meetings should be tailored based on the Stages of Change Model (See Appendix), which acknowledges where the youth is in his or her journey of leaving an exploitative relationship.



2. Attend regularly and participate collaboratively
3. Ensure child accesses services and supports decided upon in the MDT

c. Mandatory Reporting²⁰

- i. All participating agencies must comply with mandatory reporting laws as set forth in the Child Abuse and Neglect Reporting Act.²¹
- ii. Mandatory reporters are required to report abuse or neglect when they *know* or have *reasonable suspicion* that the abuse or neglect has occurred.²²
- iii. Sexual exploitation is a form of sexual abuse and must be reported by mandated reporters. Sexual exploitation includes: "Conduct involving matter depicting a minor engaged in obscene acts...Any person who knowingly promotes, aids, or assists, employs, uses, persuades, induces, or coerces a child, or any person responsible for a child's welfare, who knowingly permits or encourages a child to engage in, or assist others to engage in, prostitution or a live performance involving obscene sexual conduct..."²³

d. Agency Internal Identification and Response Protocols

- i. Each county agency should create its own internal Identification and Response Protocol that aligns with the Interagency Protocol and defines steps agency staff must take to:
 1. Identify CSEC and those children at risk for exploitation,
 2. Respond immediately and on an ongoing basis
 3. Coordinate and communicate with partner agencies and providers.²⁴

V. Specific Participant Roles and Responsibilities

a. Child Welfare

- i. Lead the development of the interagency protocol (required)
- ii. Participate in the MDT (required)
- iii. Convene and serve as lead agency of steering committee
- iv. Maintain the child abuse hotline to receive CSEC referrals
- v. Develop mechanism for tracking CSEC referrals
- vi. Provide case management
- vii. Recognizing the unique challenges to engagement, establish trusting relationship with CSEC
- viii. Develop a service plan to fit CSEC needs in collaboration with other provider agencies

²⁰ Cal. Penal Code §§ 11164-11174.3.

²¹ *Id.*

²² Cal. Penal Code § 11166(a) (requiring that a mandated reporter make a report to the child abuse agency when the "mandated reporter, in his or her professional capacity or within the scope of his or her employment, has knowledge of or observe a child whom the mandated reporter knows or reasonably suspects has been the victim of child abuse or neglect.").

²³ Cal. Penal Code § 11165.1(c)(1-3).

²⁴ Further guidance on Internal Identification and Response Protocols will be provided as part of the CSEC Practice Guidance Toolkit, (forthcoming March 2015).



- ix. Connect child to crisis prevention and intervention services that meet the needs of CSEC
- x. Provide aggregate child welfare data on identified CSEC to steering committee including, but not limited to, the current status of each youth, (e.g. placement type, AWOL, etc.), the placement type, and services received
- xi. Provide court reports pertaining to victim's case as needed

b. Probation

- i. Participate in the development of the interagency protocol (required)
- ii. Participate in MDT (required)
- iii. Participate in Steering Committee
- iv. Develop mechanism for tracking CSEC
- v. Perform juvenile intake investigations and make recommendations for appropriate action if CSEC has an open case or has been arrested
 - 1. Investigate and evaluate circumstances of victim's exploitation, including interviewing offender(s), parents, relatives, collateral sources, witnesses, victims, and law enforcement
- vi. Provide case management
- vii. Recognizing the unique challenges to engagement, establish trusting relationship with CSEC
- viii. Develop a service plan to fit CSEC needs in collaboration with other provider agencies
- ix. Connect child to crisis prevention and intervention services
- x. Provide court reports pertaining to victim's case as needed

c. Mental Health

- i. Participate in the development of the interagency protocol (required)
- ii. Participate in MDT (required)
- iii. Participate in Steering Committee
- iv. Develop mechanism for tracking CSEC
- v. Perform assessment of CSEC victim's mental health and recommend services
- vi. Coordinate specialized mental health services for victim
- vii. Provide guidance about mental health supports in placement that may be particularly helpful for CSEC (e.g. respite, mobile crisis response)

d. Public Health

- i. Participate in the development of the interagency protocol (required)
- ii. Participate in MDT (required)
- iii. Participate in Steering Committee
- iv. Develop mechanism for tracking CSEC
- v. Perform medical evaluation of CSEC victim
- vi. Coordinate appropriate response and services specific to CSEC
- vii. Provide information related to reproductive and sexual health including access to contraceptives, HIV prophylaxis, and treatment for STIs/STDs to CSEC



e. Substance Abuse

- i. Participate in MDT (required)
- ii. Participate in Steering Committee
- iii. Participate in the development of the interagency protocol
- iv. Develop mechanism for tracking CSEC
- v. Perform substance abuse assessment of CSEC recognizing that some exploited children use substances as a coping mechanism

f. Juvenile Court

- i. Participate in the development of the interagency protocol (required)
- ii. Appoint dependency and delinquency court representatives to Steering Committee
- iii. Develop mechanism for tracking CSEC
- iv. Ensure coordinated response for CSEC

g. Education²⁵

- i. Participate in Steering Committee
- ii. Participate in the development of the interagency protocol
- iii. Participate in MDT
- iv. Develop mechanism for tracking CSEC
- v. Assess CSEC's educational needs, recognizing that these children may be behind in school or school may be a trigger because they were recruited from school
- vi. Coordinate appropriate response to meet victim's educational needs, including but not limited to, assisting in enrolling youth, addressing truancy issues, ensuring credits have been gathered and applied, etc.

h. Children's Dependency Attorneys

- i. Participate in Steering Committee
- ii. Participate in the development of the interagency protocol
- iii. Participate in MDT (may be attorney or representative including an investigator)
- iv. Develop mechanism for tracking CSEC
- v. Recognizing the unique challenges to engagement, establish trusting relationship with CSEC
- vi. Maintain frequent communication with client to ensure frequently changing needs are addressed as the child moves through the stages of exploitation.

i. District Attorney

- i. Participate in Steering Committee
- ii. Participate in the development of the interagency protocol
- iii. Develop mechanism for tracking CSEC

²⁵ Include the County Office of Education, Foster Youth Services Program, and the AB 490 liaison from each school district with a significant population of foster/probation youth.



j. Public Defender

- i. Participate in Steering Committee
- ii. Participate in the development of the interagency protocol
- iii. Develop mechanism for tracking CSEC
- iv. Recognizing the unique challenges to engagement, establish trusting relationship with CSEC
- v. Maintain frequent communication with client to ensure frequently changing needs are addressed as the child moves through the stages of exploitation.

k. Survivors

- i. Participate in Steering Committee
- ii. Participate in the development of the interagency protocol
- iii. Participate in MDT as appropriate/when desired by youth
- iv. Provide advocacy and mentorship as needed to the youth
- v. Engage youth and develop relationship with key adults outside of the public agencies

l. Direct Service Providers/Civil Legal Advocates

- i. Participate in Steering Committee
- ii. Participate in the development of the interagency protocol
- iii. Participate in MDT as appropriate/when desired by youth
- iv. Develop mechanism for tracking CSEC
- v. Assess the holistic legal needs of the client

m. Law Enforcement

- i. Participate in Steering Committee
- ii. Participate in the development of the interagency protocol
- iii. Develop mechanism for tracking CSEC
- iv. Promptly report known or suspected child abuse/neglect to the child abuse hotline

n. County Counsel

- i. Participate in Steering Committee
- ii. Participate in the development of the interagency protocol
- iii. Ensure compliance with all state and federal information sharing, confidentiality and self-incrimination protections

