

**SENIOR POLICY OPERATING GROUP
PUBLIC AWARENESS AND OUTREACH COMMITTEE:**

**GUIDE FOR INTRODUCTORY HUMAN
TRAFFICKING AWARENESS TRAINING
(Non-Binding)**

Human trafficking (also known as “trafficking in persons”) is a crime of exploitation. It is generally understood within the United States to mean:

- The recruitment, harboring, transportation, provision, obtaining, patronizing, or soliciting of a person for the purpose of a commercial sex act (sex trafficking),¹ in which a commercial sex act² is induced by force, fraud, or coercion, or in which the person induced to perform such act has not attained 18 years of age; and

¹ See 22 U.S.C. § 7102(12).

² The term “commercial sex act” means any sex act on account of which anything of value is given to or received by any person. 22 U.S.C. § 7102(4). 18 U.S.C. § 1591 provides a criminal definition for sex trafficking that is similar to that contained within 22 U.S.C. § 7102(11); it prohibits the same acts in addition to enticing, advertising, or maintaining a person for the same purpose and through the same means.

- The recruitment, harboring, transportation, provision, or obtaining of a person for labor or services through the use of force, fraud, or coercion for the purpose of subjection to involuntary servitude, peonage, debt bondage, or slavery.³

Human trafficking exists in every region of the United States and around the world and poses a grave danger to individual well-being, public health, public safety, national security, economic development, and prosperity.⁴

Because of the pervasiveness of the crime, combating human trafficking requires a comprehensive, multidisciplinary effort. A range of professionals – including federal law enforcement and service provider agencies – must understand human trafficking and their roles in responding to potential instances of human trafficking to effectively combat the crime and protect the affected individuals, families, and communities. Introductory human trafficking awareness training will prepare professionals in the variety of fields that may encounter trafficking to detect, respond to, and prevent human trafficking.

The President’s Interagency Task Force to Monitor and Combat Trafficking in Persons⁵ (PITF) and the Senior Policy Operating Group (SPOG), which consists of senior officials designated as representatives of the PITF agencies, ensure coordination across the

³ See 22 U.S.C. § 7102(11). For additional legal definitions, see 18 U.S.C. Chapter 77 (criminal definitions) and 19 U.S.C. § 1307 (includes customs definition of “forced labor”). Among other provisions, Chapter 77 includes the core forced labor and sex trafficking crimes; crimes related to peonage, slavery, and involuntary servitude; and a crime captioned “trafficking with respect to peonage, slavery, involuntary servitude, or forced labor,” which prohibits recruiting, harboring, transporting, providing, or obtaining by any means a person for labor or services in violation of Chapter 77. 18 U.S.C. § 1590.

⁴ [National Action Plan to Combat Human Trafficking.pdf](#).

⁵ The PITF is a cabinet-level entity that comprises the Departments of State, the Treasury, Defense, Justice, Interior, Agriculture, Commerce, Labor, Health and Human Services, Transportation, Education, and Homeland Security; the Office of the United States Trade Representative; the United States Agency for International Development; the Equal Employment Opportunity Commission; the Office of the Director of National Intelligence; and the White House Offices of Management and Budget, the National Security Council, and the Domestic Policy Council. See [Agencies of the Presidents Interagency Task Force to Monitor and Combat Trafficking in Persons](#).

U.S. government to combat trafficking in persons. This multifaceted federal response includes raising awareness and educating stakeholders to develop targeted strategies to address risk factors in their communities and prevent traffickers from committing this crime.

This guide serves as a public resource that reflects the core learning objectives and development standards that SPOG agencies use when creating introductory training on human trafficking for federal law enforcement agencies and service provider agencies. The guide responds to Priority Action 2.1.3. in the National Action Plan to Combat Human Trafficking.⁶ Professional entities, including anti-trafficking organizations and other NGOs, are encouraged to follow this guide when developing or updating human trafficking training for their workforces.⁷

The SPOG would like to thank the subject-matter experts with lived experience of human trafficking who reviewed this document and provided feedback.

Select Federal Government Training Resources

These resources are useful starting points when developing training. Professional entities are encouraged to first familiarize themselves with existing public federal trainings to ensure new material is not duplicative. Examples include:

- [Understanding Human Trafficking](#) (Department of Justice, Office for Victims of Crime)

⁶ Priority Action 2.1.3 calls on the government to regularly train federal law enforcement and service provider agencies on identifying human trafficking and specifically calls on the SPOG Public Awareness and Outreach Committee to develop guidelines for introductory-level human trafficking awareness training that agencies could use as a resource and share with their stakeholders. See the [National Action Plan to Combat Human Trafficking.pdf](#), p. 29.

⁷ See also the [SPOG's Public Awareness and Outreach Committee Guide for Public Awareness Materials \(non-binding\)](#).

- Stop, Observe, Ask, and Respond to [Human Trafficking \(SOAR to Health and Wellness\) Training Program](#) (Department of Health and Human Services, Office on Trafficking in Persons)
- [Blue Campaign](#) (Department of Homeland Security)
- [Human Trafficking: Forced Labor in Global Supply Chains](#) (Department of Commerce)

Core Learning Objectives

The training should have clear learning objectives and include content and activities designed to meet those objectives. Objectives should use language consistent with that of the National Action Plan to Combat Human Trafficking and should include, at a minimum, the following (see [Tab A: Checklist that provides more details for each](#)):

- Identify and discuss severe forms of trafficking in persons, noted above and as defined in the [Trafficking Victims Protection Act of 2000, as amended \(TVPA\)](#); ⁸ distinguish among severe forms of trafficking in persons and the federal criminal statutes for forced labor (18 U.S.C. § 1589) and sex trafficking (18 U.S.C. § 1591), as well as state human trafficking statutes; and differentiate between human trafficking and related crimes, including other forms of exploitation, human smuggling (8 U.S.C. § 1324), and consensual commercial sex between adults.
- Describe the concepts of force, fraud, and coercion as they relate to human trafficking. ⁹

⁸ See 22 U.S.C. § 7102(11).

⁹ For additional details on the meaning of force, fraud, and coercion relating to trafficking in persons, see the [National Action Plan to Combat Human Trafficking.pdf](#), p. 10, and [The U.S. Advisory Council on Human Trafficking Annual Report.pdf](#), p. 14-16.

- Identify common vulnerabilities that traffickers often target and factors that make certain individuals and communities more vulnerable to human trafficking.
- Discuss common industries and settings where human trafficking often occurs.
- Identify indicators of human trafficking, including information about trafficker profiles; their recruitment tactics; and their methods for employing force, fraud, or coercion.
- Describe victims' rights under federal law and available victim protections or resources offered by federal, state, local, and Tribal governments (if applicable).
- Discuss how to respond to individuals who may have experienced human trafficking in a person-centered, trauma-informed, and culturally responsive manner; and how to mitigate implicit bias in any response.
 - Describe procedures for connecting individuals who have experienced trafficking with service providers. This includes sharing the National Human Trafficking Hotline number and text number, along with any local hotlines, as well as guidance on how to navigate those resources.
 - Outline recommended reporting protocols.

Use of Statistics

If citing data, the training should remain consistent with research and cite accurate sources while acknowledging the current limitations surrounding the collection of data on human trafficking. Reliable statistics on the prevalence of human trafficking are hard to ascertain; the quality and quantity of human trafficking data available are often hampered for various reasons. For example, forced labor and sex trafficking are often hidden crimes, are frequently underreported, and are constantly evolving, leading to gaps in data accuracy and completeness and challenges identifying individuals who have experienced trafficking. For these reasons, data and statistics may not reflect the

full nature or scope of the problem and usually cannot measure the prevalence of human trafficking.¹⁰

When using statistics or data, the training should:

- Avoid generalizing statistics or the scope of any research studies.
- Provide context on the source of the data collected (i.e., sample size, denominator).
- Cite original sources and consider the data sources used.
- Avoid extrapolating national data from non-national studies.
- Be as concise and rigorous as possible when vetting data sources.
- Use precise language when describing what the data shows (e.g., incident reporting versus prevalence).
- Clearly state data limitations.

International Labour Organization Estimates

The International Labour Organization (ILO) and the Walk Free Foundation, in partnership with the International Organization for Migration, released the latest

¹⁰ See more about human trafficking data here: [DOJ/OVC Human Trafficking Resources](#) and [Approaches to Estimating the Prevalence of Human Trafficking in the United States](#).

[Global Estimates of Modern Slavery](#) in September 2022.¹¹ Their report estimates that, at any given time in 2021, approximately 27.6 million people were in forced labor.¹²

National Human Trafficking Hotline Data

The National Human Trafficking Hotline (Hotline) provides [data on human trafficking in the United States](#) on its website.¹³ These data sets are based on aggregated information learned through phone calls, emails, online tips, and texts the Hotline receives and should not be confused with prevalence studies or confirmed cases. The Hotline does not verify the accuracy of information reported. Rather, it determines on a case-by-case basis whether the information should be passed on to an appropriate federal, state, local, or Tribal investigative or service agency that is equipped to investigate the tip or respond to the needs of the individual.

Annual Federal Reports

The [United States Country Narrative](#)¹⁴ in the Department of State's annual [Trafficking in Persons Report](#)¹⁵ and the [Attorney General's Annual Report to](#)

¹¹ See [Global Estimates of Modern Slavery](#). This report estimates that 49.6 million people in total were in "modern slavery" at any given time in 2021. However, this figure includes both the estimate for forced labor and an estimate for forced marriage (22 million). It is recommended to use only the 27.6 million forced labor estimate. Due to the scope of exploitation captured by this estimate, it generally reflects what the U.S. government considers to be covered by the umbrella term "human trafficking," which includes forced labor and sex trafficking.

¹² The definition of forced labor used for the purposes of this statistic is based on ILO Forced Labour Convention, 1930 (No. 29), which states in Article 2.1 that forced or compulsory labor is "all work or service which is exacted from any person under the menace of any penalty and for which the said person has not offered himself voluntarily." Article 2.2 includes several types of work that are excepted from this definition, including "any work or service exacted in virtue of compulsory military service laws for work of a purely military character."

¹³ See the [Hotline's National Statistics](#).

¹⁴ See the 2022 United States country narrative: [2022 Trafficking in Persons Report/United-States](#).

¹⁵ See the Trafficking in Persons Report: [Trafficking in Persons Report](#).

[Congress on U.S. Government Activities to Combat Trafficking in Persons](#)¹⁶ include updated federal statistics on the following:

- Number of newly opened investigations, initiated prosecutions, and secured convictions.
- Number of defendants charged.
- Funding provided to task forces and the number of new task forces.
- Number of Certification Letters to foreign national adults and Eligibility Letters to foreign national children in the United States issued.¹⁷
- Funding for victim services, the number of NGOs supported, and the number of individuals served through this funding.
- Number of child trafficking victims assisted through the Department of Health and Human Services (HHS) Unaccompanied Refugee Minors Program.
- Number of individuals granted principal T nonimmigrant status and derivative T nonimmigrant status.¹⁸

¹⁶ See the Attorney General's human trafficking reports from fiscal years 2003 through 2020: [Attorney General's Human Trafficking Reports](#).

¹⁷ As part of HHS's assistance to foreign national victims, HHS provides Certification Letters to foreign national adult victims of severe forms of trafficking in persons, which enables them to apply for benefits and services to the same extent as refugees, after DHS grants Continued Presence or when a victim has a bona fide or approved application for T nonimmigrant status, as described further below. HHS also provides Eligibility or Interim Assistance Letters to foreign national children, which enables them to apply for benefits and services to the same extent as refugees, upon receipt of credible information the child is or may be a victim of a severe form of trafficking in persons under the TVPA. For additional information, see: [Victim Assistance/Certification Letters](#).

¹⁸ T nonimmigrant status is a temporary immigration benefit that enables certain victims of a severe form of trafficking in persons) to remain in the United States for an initial period of up to four years if they have complied with any reasonable request for assistance from law enforcement in the detection, investigation, or prosecution of human trafficking or qualify for an exemption or exception. For additional information, see: [Victims of Human Trafficking: T Nonimmigrant Status](#).

- Number of individuals granted Continued Presence and extensions of Continued Presence.¹⁹
- Number of Hotline signals, including calls, texts, chats, online tips, and emails, and a breakdown by caller type.
- Number of trainings provided to build the capacity of frontline professionals to respond to human trafficking.

Standards for Course Design

The course design and content should:²⁰

- Avoid misconceptions about human trafficking.²¹
- Be tailored based on the goals, audience, method of delivery, and vulnerabilities or indicators of human trafficking the audience is most likely to encounter and the appropriate responses.
- Employ best practices in adult learning theory.²²
- Be concise by using plain language and consider translating the material in accordance with a language access plan.²³

¹⁹ Continued Presence is a temporary immigration status provided to individuals identified by law enforcement as victims of human trafficking. This status allows victims who are potential witnesses to remain in the United States temporarily during the ongoing investigation into the crimes committed against them. For additional information, see here: [Continued Presence/Temporary Immigration Designation for Victims of Human Trafficking.pdf](#).

²⁰ See [Examples of Key Considerations for Developing and Accessing Human Trafficking Resources](#).

²¹ For examples of common misconceptions, see: [Human Trafficking Myths and Facts](#).

²² See [Best Practices in Adult Learning Theory.pdf](#).

²³ See [Language Access Plans](#).

- Be accessible to individuals with disabilities by meeting or exceeding the requirements of [Section 508 of the Rehabilitation Act of 1973](#), as amended (29 U.S.C. § 794d).²⁴

The course should use person-centered,²⁵ trauma-informed,²⁶ and culturally responsive²⁷ content that:

- Is empowering and uses inclusive, strengths-based language, avoiding judgmental language and terms like “rescue” or “save.”²⁸ Instead use words such as “identified and received services.”
- Is sensitive to individuals from various cultures and backgrounds.

²⁴ See [Section508.gov](#).

²⁵ The person-centered approach is defined as placing an individual's priorities, needs, and interests at the center of the work; providing nonjudgmental assistance, with an emphasis on self-determination, and assisting individuals in making informed choices; ensuring that restoring feelings of safety and security are a priority; and safeguarding against policies, procedures, settings, and practices that may inadvertently re-traumatize the individual. A person-centered approach should also incorporate a trauma-informed, survivor-informed, and culturally competent approach.

²⁶ A trauma-informed approach recognizes signs of trauma in individuals and the professionals who help them and responds by integrating knowledge about trauma into policies, procedures, practices, and settings; and seeking to actively resist re-traumatization. This approach includes an understanding of the vulnerabilities and experiences of trauma survivors, including the prevalence and physical, social, and emotional impact of trauma. A trauma-informed approach places priority on restoring the survivor's feelings of safety, choice, and control. Programs, services, agencies, and communities can be trauma-informed. This definition can be found on page 60 of the National Action Plan to Combat Human Trafficking. For more information, see: [Task Force Guide - Using a Trauma Informed Approach; Understanding Trauma 508c.pdf, Applying a Trauma Informed Approach 508c.pdf](#).

²⁷ The ability of an individual or organization to interact effectively with people of different cultures. This includes drawing on knowledge of culturally based values, traditions, customs, language, and behavior to plan, implement, and evaluate service activities. Some organizations use the terms “cultural accountability” or “cultural responsiveness.” This definition can be found on page 60 of the National Action Plan to Combat Human Trafficking.

²⁸ For information on inclusive communication principles, see: [Health Communication/Health Equity](#).

- Does not re-traumatize by including sensational details, images, or language (i.e., stories and photos that are limited to or linger on the details of someone's trafficking experiences).
- Supports individual rights, dignity, autonomy, and self-determination.
- Uses positive framing, which can elicit a positive response from the audience and encourage action.
- Recognizes that not all individuals who experience trafficking may identify as "victims" or "survivors" and thus takes care to appropriately use person-centered language that identifies individuals who have experienced trafficking first and foremost as people rather than labeling them solely as "victims" (e.g., refer to "individuals with lived experience of human trafficking" or "individuals who have experienced human trafficking").
- Does not use cultural or gender stereotypes.
- Addresses various trafficking case trends among a range of demographic characteristics (e.g., type of trafficking, gender, nationality, race, and ethnicity).
- Provides context for systemic barriers that lead to disparities in trafficking and access to services.
- Includes effective and appropriate ways to respond to individuals who have been or may be at risk of experiencing trafficking and delivers an accurate depiction of the reality of human trafficking in various contexts.

When developing training, engage experts with lived experience of human trafficking (experts with lived experience) as participants in the process. When engaging such individuals: ²⁹

²⁹ For more information on building survivor-informed organizations, see: [Resource Toolkit/Building Survivor Informed Organizations](#).

- Consult throughout the development of content, including in the initial design.
- Start with experts with lived experience who are already active and established as advocates, and be sure to incorporate diverse perspectives (e.g., sex and labor trafficking experts, LGBTQI+ experts, and individuals with a range of immigration backgrounds).
- Secure written permission before featuring experts with lived experience in any written or visual material and discuss potential safety risks. Experts should give informed consent in advance of any training as to how their name, photo, or story will be used, as publishing any of this information without informed consent could compromise their safety or well-being and cause re-traumatization.
- Offer financial compensation to experts with lived experience as would be provided for other experts, such as workshop presenters or keynote speakers. If other experts, such as workshop presenters or keynote speakers, are being compensated, experts with lived experience should be compensated at a similar rate.
- Be clear about next steps and the projected timeline of the project and communicate any changes throughout the process.
- Proactively communicate any details regarding content ownership and intellectual property as it pertains to the consultant relationship and any content experts with lived experience may create.
- Consider having your team review the six guiding principles of a trauma-informed approach and identifying ways to implement these concepts when engaging with lived experience experts.³⁰

³⁰ For information on the guiding principles, see: [Six Guiding Principles to a Trauma-Informed Approach](#).

* Note: Resources that are survivor-informed should describe how experts with lived experience were involved in their creation. Examples may include their being identified as authors, consultants, trainers, or participants in curriculum development or peer review.

Guidelines for Use of Images ³¹

Images should:

- Be person-centered, culturally appropriate, and promote an accurate understanding of human trafficking. Images can draw intended and unintended connections in the audience's mind.
- Reflect the diverse spectrum of individuals who experience human trafficking (i.e., all races, ethnicities, ages, gender identities, sexual orientations, abilities, socioeconomic and immigration statuses). For instance, if all training materials about sex trafficking depict only women and girls, audiences may not realize that men, boys, and LGBTQI+ individuals can also experience sex trafficking.
- Be tailored to the demographics of the target audience to ensure the message is relatable. For instance, training for an audience in the education sector should feature school communities and school settings.
- Depict a range of relevant environments in which trafficking can occur.
- Show examples of what someone in the target audience might encounter and encourage an appropriate referral mechanism, such as the National Human Trafficking Hotline and local services. It is important to encourage the audience to get help rather than take independent action, except when the audience is first responders.

³¹ Senior Policy Operating Group's [Public Awareness and Outreach Committee Guide for Public Awareness Materials \(Non-binding\)](#).

Avoid images that:

- Display physical abuse, whether in action or its aftereffects, or that include sexual or graphic images of victims. These types of images can be dehumanizing or objectifying and depict individuals merely as objects of violence. They can also re-traumatize audience members who may have experienced exploitation or abuse.
- Tokenize certain communities, histories, or trends by overrepresenting individuals from communities of color as at-risk or experiencing human trafficking and not depicting them in helping roles.
- Display minor victims without redaction.
- Reinforce misconceptions about human trafficking. Human trafficking is a complex crime that takes many forms. Images that only rely on the most violent examples, like those depicting individuals in chains, behind bars, blindfolded, or in handcuffs, can promote the common misperception that individuals must be physically restrained to experience human trafficking. This ignores other highly common forms of fraud and coercion that can be used to exploit individuals (e.g., debt bondage, emotional abuse, and other forms of manipulation).
- Sensationalize the issue for shock value to draw the audience's attention. Examples of these types of images include individuals with barcodes tattooed on their bodies, kidnapping scenes, or children in distress.
- Depict individuals "rescuing victims," which could put both bystanders and people who may be experiencing trafficking at an increased risk of harm.
- Depict individuals with lived experience of human trafficking without their informed consent (e.g., consent regarding who will be permitted to use the image, how the image will be used, potential audiences that may see the image).

- Depict individuals with lived experience of human trafficking only in settings that insinuate harm, suffering, or difficulty. Images including individuals with lived experience should also demonstrate their strength and resilience.
- Fail to comply with stock photo terms of use, if relevant.

Tab A – Content Checklist for Introductory-Level Human Trafficking Training

Learning Objectives

1. Identify and discuss severe forms of trafficking in persons, as defined in the Trafficking Victims Protection Act of 2000, as amended (TVPA);³² distinguish among severe forms of trafficking in persons and the federal criminal statutes for forced labor (18 U.S.C. § 1589) and sex trafficking (18 U.S.C. § 1591), as well as state human trafficking statutes; and differentiate between human trafficking and related crimes, including other forms of exploitation, human smuggling (8 U.S.C. § 1324), and consensual commercial sex between adults.
 - “Severe forms of trafficking in persons” is defined by the TVPA and its subsequent reauthorizations³³ as:
 - a) Sex trafficking in which a commercial sex act is induced by force, fraud, or coercion, or in which the person induced to perform such an act has not attained 18 years of age; or
 - b) The recruitment, harboring, transportation, provision, or obtaining of a person for labor or services, through the use of

³² See 22 U.S.C. § 7102(11).

³³ See 22 U.S.C. § 7102(11).

force, fraud, or coercion for the purpose of subjection to involuntary servitude, peonage, debt bondage, or slavery.

- Human trafficking takes many forms. Sex trafficking occurs when a person is required to engage in a commercial sex act as the result of force, threats of force, fraud, coercion, or any combination of such means, or when a person under the age of 18 is caused to engage in commercial sex (even in the absence of force, fraud, or coercion). Under such circumstances, perpetrators involved in recruiting, enticing, harboring, transporting, providing, obtaining, advertising, maintaining, patronizing, or soliciting a person for that purpose are guilty of the federal crime of sex trafficking. This is true even if the victim previously consented to engage in commercial sex.³⁴
- The term “forced labor,” sometimes also referred to as labor trafficking,³⁵ encompasses the range of activities involved when a person uses force, fraud, or coercion to exploit the labor or services of another person. It is defined for enforcement purposes in two separate sections of the United States Code. In the criminal statutes of Title 18, the term encompasses the range of activities involved when an individual or entity uses prohibited means that include force or physical threats; psychological coercion; abuse of the legal process; a scheme, plan, or pattern intended to hold a person in fear of serious harm; or other coercive means to obtain the labor or services of a person. Once a person’s labor is obtained by such means, the person’s previous consent or effort to obtain employment with the trafficker does not preclude the person from being considered a victim, or the government

³⁴ [National Action Plan to Combat Human Trafficking.pdf](#), p. 59.

³⁵ Labor trafficking is another term used in other parts of the U.S. Code to refer to human trafficking involving compelled labor, as distinct from sex trafficking.

from prosecuting the offender. Forced labor in Title 18 also encompasses when an individual or entity knowingly benefits, financially or by receiving anything of value, from participating in a venture which has engaged in providing or obtaining labor or services by prohibited means, knowing or in reckless disregard of the fact that the venture has engaged in providing or obtaining labor or services by such prohibited means. In the customs-related statute of Title 19, it is also defined in connection with the prohibition on the importation of goods produced wholly or in part by forced labor, including forced child labor; convict labor; and/or indentured labor under penal sanctions. In this context, forced labor is defined as: “all work or service which is exacted from any person under the menace of any penalty for its nonperformance and for which the worker does not offer [themselves] voluntarily.”³⁶ Note that forced labor can include subjection to forced criminal acts (e.g., services for a gang, drug smuggling, drug use, etc.).

- The National Action Plan to Combat Human Trafficking contains additional information on the TVPA’s federal definitions of trafficking in persons, including relevant federal criminal statutes.³⁷
- Sometimes state laws have slightly different definitions of human trafficking, sex trafficking, and labor trafficking. If citing a state law for trafficking-related definitions, double-check the law³⁸ to make sure it is current and accurate.
- Human trafficking is distinct from the separate crime of human smuggling. Trafficking is a crime committed against a person

³⁶ [National Action Plan to Combat Human Trafficking.pdf](#), p. 58.

³⁷ [National Action Plan to Combat Human Trafficking.pdf](#), p. 58-59.

³⁸ See [Civil and Criminal Justice/Human Trafficking Laws](#).

regardless of the person's immigration status or the crossing of a transnational border, while smuggling is a crime under a country's immigration laws and involves the willful movement of a person across a country's border. It is a misconception that human trafficking requires crossing a border. In fact, it does not require movement at all. Although human trafficking and human smuggling are distinct crimes, individuals who are smuggled are vulnerable to experiencing human trafficking and other serious crimes. The fact that an individual consented to a voluntary smuggling arrangement does not negate the fact that they may also experience trafficking during the course of the smuggling. In some smuggling arrangements, conditions may evolve into trafficking, and in some instances, individuals may experience smuggling and trafficking simultaneously.³⁹

- Not all sub-standard or exploitative working conditions constitute labor trafficking. Evidence of labor exploitation, which can entail the mistreatment of workers in violation of civil labor laws, is often part of a labor trafficking scheme. Both labor exploitation and labor trafficking may involve the withholding of wages, unpaid overtime, physical violence, sexual abuse, or unsafe and unhealthy work conditions. Both happen in various sectors of the economy, including construction, agriculture, manufacturing, and domestic work. Employers become human traffickers when they use force or physical threats, psychological coercion, abuse of the legal process, deception, or other

³⁹ For more information, see the [National Action Plan to Combat Human Trafficking.pdf](#), p. 10.

coercive means to compel someone to work, resulting in the individual feeling they cannot refuse to provide the labor or service.⁴⁰

- Not all individuals engaged in commercial sex are experiencing sex trafficking. Sex trafficking of adults involves causing them to engage in commercial sex through the use of force, fraud, or coercion. When a person under 18 years old is induced to perform a commercial sex act, it is a crime of sex trafficking regardless of whether there is any force, fraud, or coercion.⁴¹
- Refer to:
 - [The National Action Plan to Combat Human Trafficking](#)
 - [Understanding Human Trafficking](#)
 - [Understanding Labor Trafficking](#)
 - [Understanding Sex Trafficking](#)

2. Describe the concepts of force, fraud, and coercion as they relate to human trafficking.

- Force may include physical restraint, physical harm, sexual assault, and beatings. Monitoring, isolation, and confinement can be used to control individuals, especially during the early stages of human trafficking, to break down their resistance.

⁴⁰ The federal criminal forced labor statute, 18 U.S.C. Section 1589, does not criminalize fraud, in itself, as a prohibited means of coercion. However, false and fraudulent acts or promises can often play a part in a scheme, plan, or pattern intended to cause the person to believe that, if that person does not perform such labor or services, that person or another person will suffer serious harm.

⁴¹ [National Action Plan to Combat Human Trafficking.pdf](#).

- Fraud may include false promises regarding employment, visas, wages, working conditions, love, marriage, or a better life. Over time, there may be unexpected changes in work conditions, compensation or debt agreements, or the nature of the relationship.⁴²
- Coercion is defined as threats of serious harm to or physical restraint against any person; or any scheme, plan, or pattern intended to cause a person to believe that failure to perform an act would result in serious harm to or physical restraint against any person. This includes psychological manipulation, document confiscation, shame or fear-inducing threats to share information or pictures with others or report to authorities, and withholding medications or daily living support, or manipulating a substance use disorder, among other things. Coercion also includes the improper use or threatened use of a law or legal process, including reporting a person to criminal law enforcement or immigration.
- Refer to:
 - [HHS Fact Sheet on Human Trafficking](#)
 - [U.S. Advisory Council on Human Trafficking Annual Report 2021](#)⁴³

3. Identify common vulnerabilities that traffickers often target and factors that make certain individuals and communities more vulnerable to human trafficking.

⁴² The federal criminal forced labor statute, 18 U.S.C. Section 1589, does not criminalize fraud, in itself, as a prohibited means of coercion. However, false and fraudulent acts or promises can often play a part in a scheme, plan, or pattern intended to cause the person to believe that, if that person does not perform such labor or services, that person or another person will suffer serious harm.

⁴³ See p. 14-16. See also [U.S. Advisory Council on Human Trafficking Annual Report 2022](#), p. 48-49.

- Refer to the [U.S. country narrative of the Trafficking in Persons Report](#)⁴⁴ and the [National Human Trafficking Hotline](#)⁴⁵ for information on common vulnerabilities that traffickers often target and factors that can make certain individuals and communities more vulnerable to human trafficking.
- While anyone can experience human trafficking, evidence suggests that Black, Indigenous, and People of Color (BIPOC), women and girls, migrants, and LGBTQI+ persons are more likely to experience trafficking than other demographic groups. Intergenerational trauma, historic oppression, discrimination, and other societal factors and inequities create community-wide vulnerabilities.⁴⁶
- Note for training developers: The field is generally moving away from providing checklists about red flags or signs of trafficking without also discussing context and situational awareness. While checklists may offer a starting point to raise awareness of possible indicators, it is important to identify situation-based descriptors that acknowledge and present the nuance and complexities of human trafficking. There are ongoing concerns that “red flags” are often racialized or biased and can be used to profile individuals. For example, submissive behavior may be cultural, tattoos that people are reluctant to explain may not indicate branding to denote ownership or control, and lack of documentation can relate to citizenship and access to documentation. If “red flags” are maintained as part of a training, trainers should note

⁴⁴ See [2022 Trafficking in Persons Report/United States](#), p. 574-582.

⁴⁵ See [National Human Trafficking Hotline/Recognizing the Signs](#).

⁴⁶ See [Acknowledging Historical and Ongoing Harm the Connections Between Systemic Racism and Human Trafficking](#).

caution on relying too heavily on red flags and the dangers of racial or cultural bias.

- Refer to:
 - [Recognizing the Signs](#)
 - [Human Trafficking Indicators](#)
 - [Indicators of Forced Labor](#)

4. Discuss common industries and settings where human trafficking often occurs.

- The [U.S. country narrative of the Trafficking in Persons Report](#)⁴⁷ includes a list of common industries and sectors where human trafficking cases have been reported.
- Note for training developers: Offer references for evidence-based risk factors for experiencing trafficking (e.g., experiencing child maltreatment, experiencing runaway episodes).
- Refer to:
 - [U.S. country narrative of the Trafficking in Persons Report](#)
 - Peer-reviewed journal articles that represent industries and settings relevant to the training. Examples include:
 - [Risk Factors for Domestic Minor Sex Trafficking in the United States: Journal of Forensic Nursing \(lww.com\)](#)

⁴⁷ See [2022 Trafficking in Persons Report/United States](#), p. 582.

- [Risk Factors for Domestic Child Sex Trafficking in the United States - Lisa Fedina, Celia Williamson, Tasha Perdue, 2019 \(sagepub.com\)](#)
5. Identify indicators of human trafficking, including information about trafficker profiles; their recruitment tactics; and their methods for employing force, fraud, or coercion.
- Traffickers can be acquaintances, employers, romantic partners, family members, or strangers, and they prey on vulnerabilities.
 - Avoid use of the term “pimp,” as it has historically carried bias against Black communities; instead use “trafficker.”
 - Avoid using only female pronouns when referring to individuals who have experienced human trafficking or only male pronouns when referring to traffickers. Whenever possible, use gender neutral pronouns.
 - Include examples that highlight a range of vulnerabilities and avenues for exploitation.
 - Refer to:
 - [The Traffickers](#)
 - [The Life Story](#)
6. Describe victims’ rights under federal law and available victim protections or resources offered by federal, state, local, and Tribal governments (if applicable).
- Describe victims’ rights under federal law and available federal, state, local, and Tribal protections or resources. This includes housing; mental health; health care services; legal services; and labor rights, such as wage restitution, retaliation laws, etc.

- Describe federal, state, and local reporting requirements for labor and sex trafficking of minors (foreign nationals and domestic U.S. citizens) including under the Justice for Victims of Trafficking Act of 2015 (P.L. 114-22), Preventing Sex Trafficking and Strengthening Families Act of 2014 (P.L. 113-183), Trafficking Victims Protection Act of 2000 (P.L. 106-386) and its reauthorizations, and Child Abuse Prevention and Treatment Act (P.L. 93-247).⁴⁸

- Capture the context of and existing resources within the geographic area in which the training will be provided. For example, many state labor agencies complement or enhance federal rights and protections. If available, provide a link or a list of local human trafficking task forces, which have valuable subject-matter experts and service providers.

- Refer to:
 - [VictimLaw – About Victims’ Rights](#)
 - National Crime Victim Law Institute, [Victims’ Rights Laws by State](#)
 - [Benefits and Services for Foreign National Adults](#) who have experienced trafficking
 - [Benefits and Services for Foreign National Minors](#) who have experienced trafficking
 - [National Human Trafficking Hotline Referral Directory](#)
 - [List of Office for Victims of Crime \(OVC\) grantees](#)
 - [List of Office on Trafficking in Persons \(OTIP\) grantees](#)

⁴⁸ See [HHS’s “Responding to Human Trafficking among Children and Youth in Foster Care and Missing from Foster Care”](#).

- [Resources for Victims of Human Trafficking and Other Crimes](#)
7. Discuss how to respond to individuals who may have experienced human trafficking in a person-centered, trauma-informed, and culturally responsive manner, and how to mitigate implicit bias in any response. Describe procedures for connecting individuals who have experienced trafficking with service providers. This includes sharing the National Human Trafficking Hotline number and text number, along with any local hotlines, as well as guidance on how to navigate those resources. Outline recommended reporting protocols.
- It is important to keep in mind language access or access to certified interpreters if engaging with an individual who may have experienced human trafficking and who may not be able to speak or read English, or who prefer to communicate in another language. The National Human Trafficking Hotline has access to interpreters for 200+ languages and text-to-voice or voice-to-text (TTY) capabilities. The Hotline can facilitate interpretation for service providers or law enforcement when necessary.
 - Law enforcement officials are responsible for making determinations that a person is the victim of human trafficking for the purposes of that person receiving mandatory victim restitution or certain rights. Additionally, only certain federal agencies can determine a victim is eligible for immigration relief or public benefits.⁴⁹ The goal of training is to know how to safely make referrals to local services providing case management services to assist navigating resources that might be

⁴⁹ Courts and federal agencies and their delegates (including non-profit organizations) can make determinations that an individual is a victim of human trafficking for purposes of getting adverse credit information taken off their credit reports. See [Prohibition on Inclusion of Adverse Information in Consumer Reporting in Cases of Human Trafficking Regulation](#).

helpful to the individual experiencing potential human trafficking. Human trafficking does not need to be proven before providing the individual information and resources that facilitate the opportunity to seek help.

- Refer to:
 - [A Comprehensive Services Response](#)
 - [SOAR: Trauma-Informed Care](#)
 - [SOAR: Culturally and Linguistically Appropriate Services](#)
 - [SOAR: Ethical Considerations – Working with Individuals Who Have Experienced Trafficking](#)
 - [Core Competencies for Human Trafficking Response](#)
 - For labor-related trainings, consider including the Department of Labor’s (DOL) National Contact Center (NCC) phone number: 1-866-4-USA-DOL (1-866-487-2365). The NCC provides nationwide toll-free information services about employment, unemployment, wages, workplace safety and health, pension and health benefits, workplace injuries, as well as all other general DOL-related inquiries. In addition to answering general information inquiries, the NCC will refer any specific inquiry from the public to the appropriate DOL office without delay.

Content/Sources

1. Ensure training does not include sensationalized language or images.
 - See “Standards for Course Design” and “Guidelines for Use of Images” sections above.

- The training should use person-first and empowering language. Refer to the [Project Trust Report](#)⁵⁰ for suggested shifts in language.
 - The word “slavery” or the term “modern slavery” should be replaced with “human trafficking.”⁵¹ Historical slavery was protected by law, while human trafficking is not protected by any legal framework.
 - Refer to [Reconsidering the Use of the Terminology Modern Day Slavery](#)⁵² and other available resources.
 - Sensationalized language is sometimes used in tandem with overreaching conclusions from data, research, and evaluation. Question and explore the validity of news sources before presenting in the training.
 - All training should be trauma-informed, which includes sensitivity around how individuals with lived experience are discussed and portrayed.
 - When developing training, engage experts with lived experience as participants in the process (see pages 11-13 above for further guidance).
2. Review all data claims to ensure they are accurate.
- See “Use of Statistics” section above.
 - Training should not include national prevalence statistics, as these do not exist. When statistics are estimates, training should include a statement clarifying these numbers are estimates.

⁵⁰ See [Project TRUST: Trauma Response to Uplift Survivors of Trafficking](#), p. 17.

⁵¹ Note that there is debate on use of this term within the anti-trafficking community, including individuals with lived experience (some advocate against using, some continue to use); for instance, see [Juneteenth and Its Significance to Racial Equity Efforts in the Anti-Trafficking Movement](#).

⁵² See [Blogs/Reconsidering the Use of the Terminology Modern Day Slavery in the Human Trafficking Movement](#).

- If presenting data, the data source, methods, and sample should be clearly defined. For best practices on data and statistics, refer to the [Project Trust Report](#).⁵³
 - If using data from the National Human Trafficking Hotline, training should indicate that these numbers represent reports to the Hotline, not confirmed trafficking cases.
 - Uniform Crime Reporting (UCR) data that is cited should include a caveat that these data only include offenses that were reported to police. Additionally, trafficking was added as a UCR category in 2013, and knowledge of how agencies are documenting and entering trafficking offenses is limited.
3. Original sources should be included for all statistics and images when using stock photos that need attribution.
- Citations should be embedded in the document/slides with full citations at the end.

Editing

1. Encourage the use of plain language (e.g., avoid use of jargon or idioms).
 - Refer to the [Federal Plain Language Guidelines](#).⁵⁴
2. Encourage the use of person-first language and [inclusive communications](#)⁵⁵ throughout the document to empower individuals (e.g., “youth in foster care” rather than “foster youth”).

⁵³ See [Project TRUST: Trauma Response to Uplift Survivors of Trafficking](#), p. 19-20.

⁵⁴ See [Plainlanguage.Gov/Guidelines](#).

⁵⁵ See [Health Communication/Health Equity](#).

- Note that when talking about individuals who have experienced trafficking, some individuals prefer the term “survivor,” “victim,” “individual with lived experience,” or something else, or do not recognize their trafficking status.
- See the [Project Trust Report](#)⁵⁶ for suggested shifts in language, such as from “victim” to “those with lived experience” or changing the frame of victims being lured or trapped to a focus on traffickers’ use of manipulation, threats, or pressure.



⁵⁶ See [Project TRUST: Trauma Response to Uplift Survivors of Trafficking](#), p. 17.