



SECTION 4

Standards for Housing Providers

Introduction

In 2017, the Council continued its work of developing standards for organizations that provide victim services to human trafficking survivors. The focus this year was on developing standards for housing providers. The first phase of this process was recognizing that housing providers and the regulations that govern these housing programs vary dramatically when serving an adult population versus a juvenile population. As a result, the Council developed two separate and unique sets of standards that narrowed down the intended audience to: “Adult Housing Providers” and “Licensed 24-Hour Child Care Facilities and DYS State-Operated Facilities.”

As with previous standards developed by the Council, it is important to note that these standards ***are not replacing or adding new requirements*** to existing rules or regulations that govern housing providers in the state of Colorado. It is equally important to note that the standards outlined below are targeted for adult housing providers and licensed 24-hour child care facilities and DYS state-operated facilities ***that choose to provide services to survivors of human trafficking***. The intent of these standards is to provide the necessary guidance to help professionals be better equipped and prepared to provide housing to human trafficking survivors that will result in positive outcomes for survivors, and to help establish a continuity of care and consistency across various service provider systems. These standards are not static, but will need to be regularly reviewed and updated to reflect the growing body of

research, the emergence of promising practices, and the experience of service providers in the anti-trafficking field.

The basic standards framework developed for housing providers is composed of nine main sections: requirements, guiding principles, victim confidentiality, identifying trafficking and intervening, service needs, partnering with other service providers, and transition planning and long-term survivorship. The standards for adult housing providers also include a section dedicated to safety considerations. Finally, each standards document provides a detailed appendix of training resources designed to help housing providers meet the training requirements contained in the standards. In choosing these resources, the Council took into consideration training cost and accessibility to ensure that all can access training and meet the standards put forth. The following pages contain the complete content of the standards developed for adult housing providers and licensed 24-hour child care facilities and DYS state-operated facilities.

Standards for Working with Human Trafficking Survivors: Adult Housing Providers

Adult housing providers play a critical role in filling a basic need that many adult survivors of human trafficking have after leaving their trafficking situation. Survivors of human trafficking often require an array of housing options, including emergency shelter, short-term, transitional housing, and long-term housing dependent on their unique set of circumstances. Some survivors may need to utilize all the forms of housing available as they transition into long-term survivorship, while other survivors may only use one form of housing.

The standards contained in this document are targeted towards adult housing providers that choose to provide services to adult survivors of human trafficking. Victim and community safety are the highest priorities of these standards.

The goal of these standards is to provide overarching guidance to housing providers on the training, expertise, and experience needed to be successful in providing housing for all adult human trafficking survivors. This includes all victim profiles. It is also the intent of these standards to provide an overview of the promising practices emerging from the anti-trafficking field on how best to serve and engage with survivors of this crime.

Requirements

Training Content Areas for All Housing Program Staff

- I. Due to the level of trauma most human trafficking survivor's experience, these standards require that all staff with direct client care contact (as determined by the facility) have knowledge and training on trauma as well as experience providing trauma-responsive interventions. This knowledge on trauma shall be demonstrated through the completion of a minimum of four hours of training in *Trauma-Specific Interventions* within the last three years.
- II. To ensure relevant training on human trafficking and how to best engage with a human trafficking survivor, these standards require you to obtain and provide proof of completion of training, within the last three years, in the content areas listed below³³:

REQUIRED COURSES/TOPICS (*following courses are required once*):

 - Introduction to Human Trafficking in Colorado (120 minutes)
 - Service Needs of Human Trafficking Survivors
- III. Due to the rapidly evolving nature of the anti-trafficking field, it is critical to engage in continuing education as promising and eventually best practices begin to emerge for the care of human trafficking survivors. In recognition of this, these standards recommend over a two-year period that staff with direct client care contact at the facilities dedicate eight hours of continuing education to human trafficking content areas. *Refer to the list of elective courses/topics for ideas as well as the training resources listed in Appendix 6.*

Guiding Principles

Housing providers should provide programming that is:

- Survivor-informed: Listening to and learning from survivors.³⁴ Giving survivors the tools to do for themselves rather than doing for them.
- Culturally responsive: Paying particular attention to social and cultural factors in managing encounters with clients from different social, cultural, and religious

³³ Training resources for required and elective courses/topics can be found in Appendix 6.

³⁴ Definition adapted from the Freedom Network. Retrieved on June 23, 2016, from <http://freedomnetworkusa.org/>.

backgrounds. A basic premise is to recognize the client's culture, your own culture, and how both affect the client-provider relationship.³⁵

- Trauma-responsive: Recognizing that trauma can have a broad and pervasive effect on a client's personhood, which affects every area of human functioning—physical, mental, behavioral, social, and spiritual. It also involves creating an environment for clients that builds trust, conveys dignity, respect, hopefulness, and offers the opportunity for choice and empowerment among clients.³⁶
- Individualized and need-based: Services should be tailored to the unique needs and background of each client, taking into consideration, but not limited to, the gender-identity, the spiritual, cultural, intellectual, physical, and emotional dynamics resulting from his or her trafficking experience.
- Legally informed: Understanding the laws governing mandatory reporting, confidentiality, and the limitations of legal privilege; should be familiar with the Victim Compensation Program's policies regarding reimbursable expenses; knowledgeable regarding the rights afforded to and the limitations on the rights of victims under the Colorado Victim's Rights Act. Mental/behavioral health professionals should not provide legal advice without a law license, and should refer questions regarding charging, legal violations, and other legal proceedings to the criminal justice advocate or lawyer handling the criminal or civil case.
- Accessible: Services should be accessible based on literacy level, language, financial considerations, Americans with Disabilities Act (ADA), etc.
- Collaborative: Collaboration is encouraged with other stakeholders in the following ways:
 - Sharing information about training opportunities and resources.
 - Advocacy on behalf of human trafficking survivor population.
 - Technical assistance, safety planning, brainstorming on difficult cases while preserving client confidentiality.

³⁵ Definition adapted from Carteret, Marcia. *Key Concepts in Cross-Cultural Communications: Culturally Responsive Care*. Dimension of Culture: Cross-Cultural Communications for Healthcare Professionals. Retrieved on June 23, 2016, from <http://www.dimensionsofculture.com/2010/10/576/>.

³⁶ Definition from the National Council for Behavioral Health. *Trauma Informed Care*. Retrieved on June 23, 2016, from <http://www.thenationalcouncil.org/areas-of-expertise/trauma-informed-behavioral-healthcare/>.

Victim Confidentiality

It is critical for victims of human trafficking to have confidential communications with and confidential assistance from direct care staff of housing programs. The ability to receive confidential services can both enhance victims' safety and their ability to reach out to and trust the provider. Some direct care staff (depending on their job function) of housing programs may have legal privilege per Colorado statute, if they meet the requirements laid out in statute.³⁷ Staff who do not have legal privilege or otherwise statutorily protected communications should receive guidance from their agency regarding appropriate recordkeeping (factual, limited information, no anecdotal or opinion-based) and full awareness that their records could be subpoenaed. Confidentiality as a concept can extend beyond statute. There are best practices when it comes to victim confidentiality that should be followed regardless, whether staff has statutorily protected communication or not:

- Information should not be shared without a signed release;
- When appropriate, the location of the housing program should not be shared with the public (staff and residents should understand and agree to not disclose the location);
- Participants in the housing program should not be expected to share picture or personal information for media, fundraising, and/or awareness raising purposes in order to receive services.

Additionally, it is important for housing providers to explain the benefits and limitations of confidentiality to the victims they assist.³⁸

Identifying Trafficking and Intervening

The housing program provider should know how to identify human trafficking within their client population.

Service Needs of Trafficking Survivors

Each survivor will have individualized and changing needs. Immediate, short-term, and long-term needs should be assessed on a regular basis, as needed in order to identify the service

³⁷ By Colorado law certain professionals have statutorily protected communication if they meet all the requirements set forth in statute. To see which professions are protected under Colorado law, see C.R.S. § 13-90-107.

³⁸ For additional information, refer to Confidentiality Institute. (2015). *A Primer on Privilege & Confidentiality for Victim Service Providers*. Retrived on May 19, 2016, from <https://nnedv.org/mdocs-posts/assessing-organization-readiness-to-provide-online-advocacy-services/>.

needs of the survivor. Below is a list of the most common needs; however, this is not an exhaustive list. Housing providers should consider how they will provide for these needs either in-house, through contracted services, or through referral to partner agencies.

- Safety planning
 - Address Confidentiality Program
- Food, clothing, and other basic needs
- On-going/long-term housing
- Service needs of aging adults
- Legal assistance,³⁹ which may include
 - Filing for immigration relief
 - Reunification/repatriation
 - Civil litigation, family, and other civil matters
 - Vacating/sealing criminal convictions
- Child care (if applicable)
- Transportation services
- Obtaining vital documents (i.e. birth certification, social security card, government ID, etc.)
- Translation services
- Victim/witness notification
- Mental/behavioral health services
- Medical and dental health services
- Substance use (abuse) treatment services
- Life skills education
- Education/vocational training
- Job training/employment placement assistance, and
- Culturally and linguistically appropriate services

When mental/behavioral health service providers are used, those providers should be able to meet the standards created by the Council as outlined for that professional sector.

In working with human trafficking survivors, it is important to understand the many layers of trauma that survivors may have experienced prior to, during, and following their trafficking experience (e.g. prior sexual/physical abuse, gang involvement, substance abuse, homelessness, etc.). All services should consider how they may need to integrate these experiences.

Safety Considerations

Housing providers should have written policy and procedures regarding safety, which should include safety protocols and procedures that minimally include a response to safety threats.

The housing program should maintain safe living conditions for survivors, which may include:

- locking doors and windows;
- security system with camera surveillance for the building perimeter;

³⁹ Please note that trafficking survivors have many legal needs, some of which may not necessarily be directly related to their trafficking experience.

- appropriate lighting;
- mechanisms or devices for contacting emergency assistance;
- compliance with applicable fire and safety codes;
- weapons of any kind should not be allowed at the facility—this can include, but is not limited to, knives of any kind, sharp objects, blunt objects, etc.;
- developing a policy regarding visitors for housing program participants;
- For the safety of the survivor, it is recommended to have individuals sign in and out of the housing program and inform staff of where they will be going;
- The locator or GPS services should be disabled on the cell phones of survivors and staff in order to protect the location of the facility and the safety of everyone; and
- It is recommended that staff or survivors not receive packages or mail at the location of the housing program. An alternative address, (such as a P.O. Box) should be provided to survivors to receive mail or packages. Consider the use of the Address Confidentiality Program⁴⁰.

It is important to note that although safety procedures and protocols are important, they should not unnecessarily restrict individual autonomy and freedom of movement of survivors.

Partnering With Other Service Providers

It is important for housing providers to partner with other agencies. This is especially true when planning for transitioning out of the program and long-term survivorship.

When applicable and when available, housing providers are highly encouraged to partner with agencies that meet the standards put forth by the Council for their professional sector. In the absence of standards to reference, other ways to vet partner agencies should be considered. In some situations it may be beneficial to have written agreements between the housing agency and its partner agencies.

When utilizing services from outside agencies, housing providers should consider how to best provide a supportive transition for the survivor. Programs should consider having procedures in place to ensure for a smooth transition between different stages of service for the survivor. It is important to honor survivor choice in selection of services. Survivors must be informed

⁴⁰ To learn more about Colorado's Address Confidentiality Program visit:
<https://www.colorado.gov/pacific/dcs/acp>.

that their participation in all services is voluntary, and they should play an active role in choosing their service provider(s).

Transition Planning and Long-Term Survivorship

The ultimate goal for survivors participating in a housing program is to regain power and control over their own lives and be self-sufficient as defined by the program participants themselves. Therefore, an important aspect of any program should be on transition planning and long-term survivorship. Planning should start early on in a client's stay and should consider the following:

- Safety planning
- Long-term housing plan
- How to build a natural support network/identifying healthy relationships
 - Spiritual/religious support
 - Cultural support
 - Family/friend support
- How to identify exploitative situations
 - Understanding your legal rights, including in the work place
- How to access legal services
- Physical and emotional health care
- Development of a self-care plan
- How to deal with future triggers
- How to access medical and mental health services, and if necessary, through public assistance
- Transportation
 - Obtaining a driver's license
 - Access and using public transportation, etc.
- Education/vocational plan
- Employment plan
 - Resume writing
 - Job searching/interview skills
- Financial literacy/creating a budget

Standards for Working with Human Trafficking Survivors: Licensed 24-Hour Child Care Facilities and Division of Youth Services (DYS) State-Operated Facilities

The standards and guidance contained in this document are currently **not** requirements under Volume 7 rules that govern social services for licensed 24-hour child care facilities and DYS state-operated facilities, but are recommendations for how to successfully provide housing for human trafficking survivors. Licensed 24-hour child care facilities and DYS state-operated facilities (which from here on out will be referenced as “facilities”) play a critical role in fulfilling the basic need for housing that many child and youth survivors of human trafficking have after leaving their trafficking situation. Survivors of human trafficking often require an array of housing options, including emergency shelter, and short-term, transitional and long-term housing, depending on their unique set of circumstances. Some survivors may need to utilize all forms of housing available as they transition into long-term survivorship, while other survivors may only use one form of housing.

The standards contained in this document are targeted towards licensed 24-hour child care facilities and Division of Youth Services state-operated facilities that choose to provide services to child and youth survivors of human trafficking. Victim and community safety are the highest priorities of these standards.

The goal of these standards is to provide overarching guidance to the facilities on the training, expertise, and experience needed to be successful in providing housing for all human trafficking survivors. This includes all victim profiles. It is also the intent of these standards to provide an overview of the promising practices emerging from the anti-trafficking field on how to best serve and engage with survivors of this crime.

Requirements

Licensure for 24-Hour Child Care Facilities

- I. 24-hour child care facilities must meet all the rules and regulations associated with their license type outlined by the Colorado Department of Human Services in 12 CCR

2509-8 Volume 7 [Child Care Facility Licensing](#)⁴¹ and all rules and regulations pertaining to any other licenses, designations, accreditations, or certifications they carry as defined by those rules and regulations.

Training Content Areas for all Housing Program Staff

- II. Due to the level of trauma most human trafficking survivor's experience, these standards require that all staff with direct client care contact (as determined by the facility) have knowledge and training on trauma as well as experience providing trauma-responsive interventions. This knowledge on trauma shall be demonstrated through the completion of a minimum of four hours of training in *Trauma-Specific Interventions* within the last three years.
- III. To ensure relevant training on human trafficking and how to best engage with a human trafficking survivor, these standards require you to obtain and provide proof of completion of training, within the last three years, in the content areas listed below⁴²:

REQUIRED COURSES/TOPICS (*following courses are required once*):

 - Introduction to Human Trafficking in Colorado (120 minutes)
 - Service Needs of Human Trafficking Survivors
- IV. Due to the rapidly evolving nature of the anti-trafficking field, it is critical to engage in continuing education as promising and eventually best practices begin to emerge for the care of human trafficking survivors. In recognition of this, these standards recommend over a two-year period that staff with direct client care contact at the facilities dedicate eight hours of continuing education to human trafficking content areas. *Refer to the list of elective courses/topics for ideas as well as the training resources listed in Appendix 7.*

Guiding Principles

Facilities should provide programming that is:

- Survivor-informed: Listening to and learning from survivors.⁴³ Giving survivors the tools to do for themselves rather than doing for them.

⁴¹ Colorado Department of Human Services, 12 CCR 2509-8 Child Care Facility Licensing Section 7.700, Last retrieved on December 21, 2017.
<http://www.sos.state.co.us/CCR/GenerateRulePdf.do?ruleVersionId=7077&fileName=12%20CCR%202509-8>

⁴² Training resources for required and elective courses/topics can be found in Appendix 7.

- Culturally responsive: Paying particular attention to social and cultural factors in managing encounters with clients from different social, cultural, and religious backgrounds. A basic premise is to recognize the client's culture, your own culture, and how both affect the client-provider relationship.⁴⁴
- Trauma-responsive: Recognizing that trauma can have a broad and pervasive effect on a client's personhood, which affects every area of human functioning—physical, mental, behavioral, social, and spiritual. It also involves creating an environment for clients that builds trust, conveys dignity, respect, hopefulness, and the opportunity for choice and empowerment among clients.⁴⁵
- Individualized and need-based: Services should be tailored to the unique needs and background of each client, taking into consideration, but not limited to, the gender-identity, spiritual, cultural, intellectual, physical, and emotional dynamics resulting from their trafficking experience.
- Legally informed: Understanding the laws governing mandatory reporting, confidentiality, and the limitations of legal privilege; should be familiar with the Victim Compensation Program's policies regarding reimbursable expenses; knowledgeable regarding the rights afforded to and the limitations on the rights of victims under the Colorado Victim's Rights Act. Mental/behavioral health professionals should not provide legal advice without a law license, and should refer questions regarding charging, legal violations, and other legal proceedings to the criminal justice advocate or lawyer handling the criminal or civil case.
- Accessible: Services should be accessible based on literacy level, language, financial considerations, ADA, etc.
- Collaborative: Collaboration is encouraged with other stakeholders in the following ways:
 - Sharing information about training opportunities and resources
 - Advocacy on behalf of human trafficking survivor population

⁴³ Definition adapted from the Freedom Network. Retrieved on June 23, 2016, from <http://freedomnetworkusa.org/>.

⁴⁴ Definition adapted from Dimension of Culture: Cross-Cultural Communications for Healthcare Professionals. Retrieved on June 23, 2016, from: <http://www.dimensionsofculture.com/2010/10/576/>.

⁴⁵ Definition from the National Council for Behavioral Health. Retrieved on June 23, 2016 from <http://www.thenationalcouncil.org/areas-of-expertise/trauma-informed-behavioral-healthcare/>.

- o Technical assistance, safety planning, brainstorming on difficult cases while preserving client confidentiality

Victim Confidentiality

Refer to rules and regulations regarding victim confidentiality as outlined in Volume 7 social services rules⁴⁶, 21⁴⁷ and Title 12⁴⁸ and 19.

Identifying Trafficking and Intervening

Facilities should know how to identify human trafficking within their client population.

Service Needs of Trafficking Survivors

Each survivor will have individualized needs. A needs assessment should be conducted at intake and on a regular basis, as needed in order to develop a comprehensive service plan that incorporates all the needs a survivor may have. Below is a list of the most common needs; however, this list is not exhaustive. Facilities should consider how they will provide for these needs either in-house, through contracted services, or through referral to partner agencies.

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| ▪ Safety planning <ul style="list-style-type: none">o Address Confidentiality Program | ▪ Obtaining vital documents (i.e. birth certification, social security, government ID, etc.) |
| ▪ Food, clothing, and other basic needs | ▪ Translation services |
| ▪ On-going/long-term housing | ▪ Child care |
| ▪ Legal guardianship | ▪ Transportation services |
| ▪ Family resources | ▪ Victim/witness notification |
| ▪ Legal assistance, ⁴⁹ which may include <ul style="list-style-type: none">o Filing for immigration reliefo Reunification/repatriationo Civil litigation, family, and other civil matterso Vacating/expunging criminal convictions | ▪ Mental/behavioral health services |
| | ▪ Medical and dental health services |
| | ▪ Life skills education |
| | ▪ Education |
| | ▪ Job training/employment placement assistance, and |
| | ▪ Culturally and linguistically appropriate services |

⁴⁶ Colorado Department of Human Services. 12 CCR 2509-8 Confidentiality of Records Section 7.701.6 and 7.714.931, last retrieved on December 21, 2017.

<http://www.sos.state.co.us/CCR/GenerateRulePdf.do?ruleVersionId=7077&fileName=12%20CCR%202509-8>

⁴⁷ Colorado Department of Human Services. 2 CCR 502-1 Behavioral Health Section 21.170.2 and 21.170.3, last retrieved on December 21, 2017.

<http://www.sos.state.co.us/CCR/GenerateRulePdf.do?ruleVersionId=7156&fileName=2%20CCR%20502-1>

⁴⁸ C.R.S. § 12-43-218 General Provisions

⁴⁹ Please note that trafficking survivors have many legal needs some of which may not necessarily be directly related to their trafficking experience.

Facilities are expected to provide mental/behavioral health services on-site through direct hire or by contract personnel. Mental/behavioral health service providers utilized should be able to meet the standards created by the Council as outlined for that professional sector.

In working with human trafficking survivors, it is important to understand the many layers of trauma that a survivor may have experienced prior to, during, and following their trafficking experience (e.g., prior sexual/physical abuse, gang involvement, substance abuse, homelessness, etc.). All services plans should consider how they may need to integrate these experiences.

Partnering With Other Service Providers

It is important for facilities to partner with other agencies. This is especially true when planning for transitioning out of the program and long-term survivorship.

When applicable and when available, it is highly encouraged that facilities partner with agencies that are in compliance with the standards put forth by the Council for their professional sector. In the absence of standards to reference, other ways to vet partner agencies should be considered. In some situations it may be beneficial to have written agreements between the housing agency and its partner agencies.

When utilizing services from outside agencies, facilities should consider how to best provide a supportive transition for the survivor. Facilities should consider having procedures in place to ensure for a smooth transition between different stages of service for the survivor.

Transition Planning and Long-Term Survivorship

The ultimate goal for survivors participating in a housing program is to regain power and control over their own lives and be self-sufficient as defined by the program participants themselves. Therefore, an important aspect of any facility should be on transition planning and long-term survivorship. Planning should start early on in a client's stay and should consider the following:

- Safety planning
- Long-term housing plan
- How to build a natural support network/identifying healthy relationships
 - Spiritual/religious support

- o Cultural support
 - o Family/friend support
- How to identify exploitative situations
 - o Understanding your legal rights, including in the work place
- How to access legal services
- Physical and emotional health care
- Development of a self-care plan
- How to deal with future triggers
- How to access medical and mental health services, if necessary through public assistance
- Transportation
 - o Obtaining a driver's license
 - o Access and using public transportation, etc.
- Education/vocational plan
- Employment plan
 - o Resume writing
 - o Job searching/interview skills
- Financial literacy/creating a budget