

# Illinois Law Enforcement Training and Standards Board

## Guidelines for the Creation of Agency Policy on Human Trafficking Investigation and Response



*Prepared for Board review pursuant to 50 ILCS 705/10.27*

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## **Preface and Use of these Guidelines**

This guideline assists Illinois law enforcement agencies in developing and implementing written policies for trauma-informed, victim-centered detection, investigation, and response to victims of human trafficking. It is intended to be simple enough for field use, detailed enough for agency adoption, and flexible enough for local resources and local prosecutor guidance.

Agencies adopting this model should complete the bracketed sections, identify local contacts, and cross-reference related agency policies. Where this model uses "shall," the term identifies a minimum policy requirement after local adoption. Where this model uses "should," the term identifies a recommended practice that may depend on resources, legal authority, exigency, and officer safety. Where this model uses "may," the term identifies permissible discretion or an option available when lawful and appropriate; it does not create a mandatory duty.

This guideline does not include undercover scripts, decoy protocols, software names, platform-specific investigative steps, or other details that should remain in agency-specific operational plans. Nothing in this model limits an officer's duty to protect life, request emergency aid, make mandatory reports, or preserve evidence consistent with law and agency policy.

## **Purpose**

The purpose of this guideline is to establish procedures for the recognition, detection, investigation, and response to actual or suspected human trafficking using a victim-centered, trauma-informed approach. The guideline is intended to:

- Improve early recognition of sex trafficking, labor trafficking, child trafficking, online or technology-facilitated trafficking, and trafficking hidden inside routine calls for service.
- Protect the safety, dignity, privacy, and legal rights of victims and potential victims.
- Stabilize victims by addressing immediate needs before in-depth interviews whenever practicable.
- Preserve evidence and support effective investigation and prosecution of traffickers, purchasers, recruiters, facilitators, and others who knowingly benefit from trafficking.
- Guide officers and supervisors in balancing victim safety, public safety, officer safety, evidence preservation, and offender accountability.
- Promote coordinated use of human trafficking service providers, survivor advocates, Child Advocacy Centers, prosecutors, multidisciplinary teams, and federal, state, and local partners.

## **Legal Authority**

This guidelines for policy creation is issued pursuant to P.A. 104-0159 and 50 ILCS 705/10.27 to assist Illinois law enforcement agencies in developing written policies for victim-centered, trauma-informed detection, investigation, and response to victims of human trafficking.

Before adopting this model, each agency should review it with its legal advisor, State's Attorney, or other appropriate local counsel. Local review should address agency procedures, prosecutor guidance, constitutional requirements, and any local agreements or protocols that affect implementation.

This model is based on the following authorities:

- P.A. 104-0159 and 50 ILCS 705/10.27, requiring the Board to make comprehensive guidelines available by July 1, 2026 and requiring law enforcement agencies to develop, adopt, and implement written policies by July 1, 2027.
- 50 ILCS 705/10.23, concerning human trafficking training standards and in-service training.
- 720 ILCS 5/10-9, defining trafficking in persons, involuntary servitude, involuntary sexual servitude of a minor, and related offenses.
- 20 ILCS 2605/2605-625, concerning the Illinois State Police strategic plan, standardized protocols, and support for multidisciplinary human trafficking task forces.
- 20 ILCS 505/45.1, concerning the Department of Children and Family Services human trafficking unit and child/youth service coordination.
- 325 ILCS 5/4, Abused and Neglected Child Reporting Act.
- 705 ILCS 405, Juvenile Court Act of 1987.
- 55 ILCS 80/4, Children's Advocacy Center Act.
- 725 ILCS 120, Rights of Crime Victims and Witnesses Act; Article I, Section 8.1 of the Illinois Constitution.
- Applicable provisions of the Illinois Trust Act, federal victim protections, search-and-seizure law, juvenile interview and custody requirements, sexual assault evidence procedures, records laws, and local agency policies.

## **Scope**

This guideline applies to all sworn officers, supervisors, investigators, telecommunicators where applicable, command staff, and all civilian employees whose duties may bring them into contact with victims, witnesses, suspects, digital evidence, records, or referrals involving human trafficking.

This guideline applies to both reactive and proactive matters, including calls for service, patrol contacts, traffic stops, missing-persons investigations, runaway recoveries, juvenile cases, domestic violence, sexual assault, narcotics, theft, labor complaints, wage disputes, code or regulatory referrals, online or digital-age indicators, hotel/motel contacts, transportation contacts, victim recovery operations, and demand-suppression operations.

This guideline applies whether the person self-identifies as a victim, denies victimization, gives inconsistent information, appears fearful, appears bonded to an offender, is involved in criminal conduct, has a warrant or prior record, is undocumented, or is unwilling to cooperate at the initial contact.

## **Policy Statement and Core Principles**

The Agency shall treat suspected human trafficking as both a serious criminal investigation and a victim-safety event. The agency's response shall be grounded in law, sound investigative practice, trauma-informed communication, and coordinated casework with prosecutors, advocates, and qualified service providers.

Human trafficking victims may not identify themselves as victims during first contact. They may deny exploitation, protect the trafficker, provide incomplete or rehearsed information, appear angry or detached, return to the trafficker, or resist help. Officers shall not treat these reactions as proof that trafficking did not occur. These behaviors may reflect fear, coercion, trauma bonding, survival strategy, or the victim's reasonable concern for personal safety or the safety of others.

**Safety comes first** - The first priority is to protect life and prevent further harm. Officers shall take reasonable steps to separate potential victims from suspected traffickers, purchasers, employers, drivers, companions, family members, or others who may be controlling, coaching, threatening, or monitoring them.

**Stabilization comes before disclosure** - Officers should consider the safety, medical needs, basic stabilization, interpreter access, and advocate support when deciding whether to conduct, limit, pause, or delay an in-depth

interview. Brief questioning may occur when necessary to protect life, identify another victim, locate a suspect, determine age or identity, or preserve evidence that may be lost.

**Victim-centered practice sets the priority** - Officers shall focus on the person’s safety, dignity, rights, privacy, and access to services. A victim does not have to cooperate with prosecution, disclose all facts immediately, or use the words “human trafficking” before receiving appropriate assistance, referrals, and rights information.

**Trauma-informed practice sets the method** - Officers shall use calm communication, explain what is happening, avoid blame, allow reasonable choices when safe and lawful, reduce unnecessary retelling of traumatic events, and recognize that trauma can affect memory, behavior, emotion, trust, and decision-making.

**Services are not leverage** - Medical care, shelter, food, clothing, interpreter access, advocacy, child-protection referrals, and safety planning shall not be conditioned on the victim’s willingness to participate in an investigation or prosecution.

**Evidence must carry the case** - Officers and investigators shall seek corroboration beyond the victim’s immediate statement whenever possible. Relevant evidence may include digital communications, online advertisements, hotel or travel records, financial records, surveillance video, witness statements, medical evidence, identity documents, and location evidence.

**Accountability remains essential** - A victim-centered response does not weaken enforcement. It strengthens enforcement by improving safety, preserving evidence, increasing trust, and focusing investigative attention on traffickers, purchasers, recruiters, facilitators, and others who benefit from exploitation.

**Criminalization of victims shall be avoided whenever legally possible** - When trafficking indicators are present, officers shall not use arrest, citation, detention, immigration consequences, child removal, or denial of services to force cooperation. Any enforcement decision involving a potential victim should be reviewed through the victimization context, available statutory protections, public safety needs, and prosecutor guidance.

## **Definitions**

<b>Term</b>	<b>Model Definition</b>
Child/Minor	A person under 18 years of age. For child sex trafficking, force, fraud, or coercion is not required to treat the child as a victim and activate child-protection protocols.
Child Advocacy Center (CAC)	A child-focused, trauma-informed facility or program that coordinates forensic interviews, medical referrals, advocacy, therapy, investigation, and prosecution in child abuse and exploitation cases.
Commercial Sexual Activity	Any sex act on account of which anything of value is given, promised, or received by any person.
Continued Presence (CP)	A temporary federal immigration designation that may be requested through law enforcement channels for an eligible noncitizen victim of a severe form of trafficking who may be a potential witness.
Forensic Interview	A developmentally appropriate, legally sound interview conducted by a trained, neutral professional using research- and practice-informed techniques. Forensic interviews should be used whenever practicable for child victims and may also be appropriate for adult victims with disabilities or other communication needs.

Term	Model Definition
Human Trafficking	Conduct prohibited by 720 ILCS 5/10-9, including involuntary servitude, involuntary sexual servitude of a minor, trafficking in persons, and attempts or financial benefit from such conduct. Human trafficking includes both labor trafficking and sex trafficking.
Human Trafficking Service Provider	A vetted governmental or nongovernmental provider with experience serving trafficking victims.
Labor Trafficking	Exploitation for labor or services obtained or maintained through coercive means. Coercive means may include physical harm or threats, restraint, abuse of law or legal process, control of identity documents, intimidation, abuse of trust or authority, substance control, financial control, debt, false promises, isolation, or any scheme causing the person to believe that refusal would result in serious harm or restraint.
MDT / MDHTTF	A multidisciplinary team or multidisciplinary human trafficking task force coordinating investigation and prosecution.
Potential Victim	A person who appears to be, may be, or is likely to be a victim of trafficking based on indicators, regardless of whether the person self-identifies, makes an outcry, cooperates, or has engaged in unlawful conduct connected to exploitation.
Qualified Interpreter	A neutral person who is competent in both languages and qualified to interpret accurately and confidentially. Suspects, suspected traffickers, customers, employers, companions, family members, children, or other conflicted persons shall not be used except for immediate emergency safety communication until a qualified interpreter is obtained.
Sex Trafficking	Trafficking involving commercial sexual activity, sexually explicit performance, production of pornography, patronizing or soliciting for a commercial sex act, or related sexual exploitation. For adults, officers should assess for force, fraud, coercion, serious harm, abuse of legal process, document control, financial control, threats, intimidation, or other control. For persons under 18, involvement in commercial sexual activity, sexually explicit performance, or production of pornography triggers child trafficking response protocols without proof of force, fraud, or coercion.
Trafficker	A person, company, or other actor who recruits, entices, harbors, transports, provides, obtains, controls, maintains, benefits from, or attempts such conduct involving another person for involuntary servitude, involuntary sexual servitude of a minor, trafficking in persons, or related exploitation. For policy purposes, this term includes facilitators and beneficiaries when the facts show knowing participation or benefit.
Trauma-Informed Response	A response that recognizes how trauma may affect memory, behavior, emotion, disclosure, decision-making, and trust. A trauma-informed response uses calm communication, transparency, patience, privacy, appropriate choices, and reduced repetition of traumatic details to avoid unnecessary retraumatization.
Victim-Centered Response	A response that prioritizes the victim's safety, dignity, rights, stabilization, and access to services while also supporting effective evidence collection, investigation, and prosecution.
Youth/Young Adult	A person between the ages of 18 and 24

# **Recognizing Human Trafficking**

Human trafficking is usually identified through patterns, not a single perfect statement. No single indicator proves trafficking, and the absence of an indicator does not rule it out. Officers shall consider the totality of circumstances, the person's age and vulnerability, the presence of control or exploitation, and available corroboration.

## **Core Indicators**

- Another person controls the person's identification documents, money, phone, transportation, housing, schedule, employment, communications, medication, or movement.
- The person appears coached, fearful, submissive, disoriented, malnourished, sleep-deprived, injured, intoxicated, withdrawn, hostile, or unable to speak freely.
- The person gives inconsistent, rehearsed, incomplete, or implausible explanations for travel, work, age, relationship, location, injuries, debt, or money.
- The person fears law enforcement, deportation, child welfare involvement, arrest, retaliation, public exposure, loss of housing, loss of drugs or medication, or harm to family members or pets.
- There are signs of trauma bonding, dependency, substance control, debt bondage, threats, isolation, surveillance, intimidation, psychological control, or financial control.
- A person under 18 is involved in commercial sexual activity, sexually explicit performance, online sexual exploitation, or exchange of sex for anything of value.
- Workers are unpaid or underpaid, threatened, housed by the employer, denied breaks, charged unclear debts, unable to leave, isolated, or threatened with immigration or police action.
- Digital evidence suggests recruitment, grooming, monitoring, advertising, payment, movement, or control by another person.

## **Pattern Recognition in Routine Calls**

<b>Call Type</b>	<b>What Officers May See</b>	<b>Policy Response</b>
Domestic violence or family disturbance	The person defers to a partner or family member. Abuse may be tied to work, money, commercial sexual activity, documents, phone access, movement, or threats. The household may appear stable while the person appears overly compliant or afraid to speak alone.	Separate the parties safely and speak privately. Ask who controls money, documents, phone access, transportation, housing, work, and safety. Assess whether a partner or family member is benefiting from exploitation.
Labor, wage, housing, or worksite complaint	Workers may live at or near the worksite. An employer, recruiter, or crew leader may control transportation, housing, communication, wages, identification documents, or work assignments. Workers may fear leaving, complaining, or speaking with law enforcement.	Treat the matter as possible labor trafficking, not only as a wage dispute. Preserve contracts, messages, pay records, schedules, housing records, transportation records, and employer or recruiter information through lawful process. Coordinate with trafficking, labor, regulatory, and prosecutorial partners.
Medical call, overdose, mental health crisis, or suicide attempt	The person may describe being trapped, ashamed, indebted, threatened, or afraid for family members. Substance use may be used as a control tactic. The person may be injured, exhausted, withdrawing, or unable to give a complete account.	Prioritize medical care, crisis response, and safety. Keep questioning limited to immediate safety and control. Ask what would happen if the person left, refused, or talked. Connect advocacy and services early.
Commercial sexual activity or prostitution-related contact	A third party may control the room, phone, schedule, transportation, payment, advertisement, or identification. Multiple ads	Screen for trafficking before taking enforcement action against the person being sold or exploited. Focus investigative attention

Call Type	What Officers May See	Policy Response
	may share the same contact information or payment method. The person may appear monitored, injured, fearful, exhausted, or under 18.	on traffickers, purchasers, advertisers, drivers, and facilitators. Preserve digital, hotel, payment, vehicle, and communication evidence through lawful process. If the person is under 18, activate child/minor protocols.
Retail theft, drug activity, burglary, or other offense possibly directed by another	The person may act under instruction, immediately hand property or money to someone else, fear consequences beyond arrest, retain no benefit, or lack stable housing and support	Ask who directed the conduct, who benefits, what happens if the person refuses, and where the person feels safe. Consider forced criminality before arrest or citation. Consult a supervisor and prosecutor when trafficking indicators are present.
Runaway, missing, truancy, or school referral	A child/minor or young adult may have an older or controlling companion, new phone, cash, clothing, online recruiter, repeated missing episodes, frequent movement, fear of home, child-welfare involvement, or reluctance to return home.	Treat the contact as high risk. Separate the person from companions or caregivers when safe and lawful. Preserve digital evidence. Assess home and caregiver safety. For persons under 18, notify a supervisor and activate CAC, DCFS, and CCBYS protocols as appropriate. For young adults, offer youth-specific trafficking services when available.
Traffic stop or transportation contact	One person may hold identification, tickets, money, phones, or travel documents for others. A driver or passenger may answer for everyone. Passengers may not know the route, destination, employer, worksite, housing location, or who arranged transportation.	Separate and speak privately when lawful and safe. Document the vehicle, route, driver, passengers, destination, employer, lodging, and documents when relevant and lawfully obtained. Use a qualified interpreter when needed. Do not base detention solely on citizenship or immigration status. Illinois law prohibits stopping, arresting, searching, detaining, or continuing to detain a person solely based on citizenship or immigration status.
Hotel/motel or short-term rental contact	There may be repeated visitors, multiple rooms, third-party booking, prepaid cards, one person paying for others, frequent relocation, online ads tied to the room, or a person who lacks a key, identification, phone, money, or control over transportation.	Protect victim privacy and avoid alerting controllers in a way that increases risk. Preserve video, registration, key-card, payment, room, vehicle, and online-ad evidence through lawful process. Coordinate with investigators, supervisors, prosecutors, and service providers when indicators are present.
Online or digital report	Indicators may include private platform migration, encrypted or disappearing messages, shared contact information across ads, online grooming, sextortion, AI-generated images or deepfakes, digital tracking, payment apps, or threats to expose images or messages.	Preserve URLs, usernames, phone numbers, screenshots, account identifiers, payment handles, platform information, and metadata when lawfully available. Screenshots are useful, but they should not replace preservation of original digital evidence. Do not copy, forward, or redistribute suspected child sexual abuse material. Coordinate with cyber or ICAC resources when minors, exploitation imagery, sextortion, or platform-based grooming may be involved.

## **Digital-Age Indicators**

Technology is not a side issue. In many cases, exploitation begins, escalates, is monitored, and is enforced online before it is visible in person. Officers should recognize that digital control can look ordinary on the surface - frequent texting, location sharing, shared passwords, or a family member monitoring social media - but may function as coercion, surveillance, stalking, or intimidation.

## **Initial Response and Responding Officer Duties**

The responding officer is not expected to complete the entire human trafficking investigation at first contact. The officer's first responsibility is to stop immediate harm and set the case up for a safe, lawful, and careful investigation. At the first encounter, the officer should focus on four priorities:

- **Make the scene safe.**  
Protect life. Stop ongoing harm. Identify immediate threats to victims, officers, witnesses, and the public. Request backup, EMS, crisis response, a qualified interpreter, a supervisor, an advocate, a child-protection resource, or a specialized investigator when needed.
- **Separate the person from control.**  
A potential victim should be separated from anyone who may be controlling, coaching, monitoring, threatening, transporting, employing, purchasing, recruiting, or benefiting from them. Separation should be done safely and without unnecessary confrontation. Officers may use neutral language, such as: "We speak with everyone separately on these calls."
- **Stabilize before seeking a full account.**  
At first contact, officers should avoid demanding a complete account. Initial questioning should focus on safety, urgent needs, age when relevant, immediate threats, suspect identification, other victims, and evidence at risk of loss. When practicable, in-depth interviews should occur after reasonable efforts have been made to address safety and stabilization needs.
- **Preserve the case.**  
Human trafficking cases often depend on corroboration. Officers should protect time-sensitive evidence, document objective observations, notify a supervisor, and bring in appropriate investigative and service resources early.

## **Required Initial Actions**

- **Ensure scene safety.**  
The officer shall protect life, prevent further harm, and control the scene. When circumstances require it, the officer shall request additional officers, EMS, crisis response, a qualified interpreter, an advocate, child-protection resources, or specialized investigators.
- **Separate safely and neutrally.**  
The officer shall separate potential victims from suspected traffickers, purchasers, employers, recruiters, drivers, companions, unsafe family members, and other persons who may influence the person's answers or increase the risk of retaliation. The officer should avoid announcing suspicions in a way that alerts a trafficker or increases danger to the victim.
- **Do not use unsafe intermediaries.**  
The officer shall not allow a suspected trafficker, purchaser, employer, companion, unsafe family member, child, or conflicted person to interpret for the victim, answer for the victim, transport the victim, access the victim, or

learn the victim's location or service plan. A qualified interpreter shall be used when language access is needed.

- **Communicate calmly and clearly.**

The officer shall explain who they are, why they are present, why people are being separated, and what will happen next. The officer should use a steady tone, plain language, and nonjudgmental questions. Threats, sarcasm, disbelief, blame, and promises that cannot be kept should be avoided.

- **Ask only what is needed at first.**

Initial questioning should focus on safety, urgent needs, identity, age when relevant, immediate threats, suspect identification, whether other victims are at risk, and evidence that may be lost. A full trafficking interview should wait until the person is safe and stabilized, unless limited questioning is necessary to protect life, locate another victim, identify a suspect, or preserve evidence.

- **Address urgent needs.**

The officer shall assess whether the person needs medical care, crisis support, food, water, clothing, shelter, restroom access, rest, medication, disability accommodation, a qualified interpreter, safe communication, transportation, or immediate safety planning. The officer should make reasonable efforts to address or facilitate assistance through available agency, advocate, medical, or other service-provider resources.

- **Activate services early.**

The officer shall offer connection to a vetted advocate or human trafficking service provider as early as practicable. Services shall be offered whether or not the person is ready to make a full statement or participate in prosecution. The officer shall document whether services were accepted, declined, delayed, or unavailable.

- **Preserve evidence through lawful means.**

The officer shall take reasonable steps to protect evidence that may be lost, moved, altered, deleted, or destroyed. This may include phones, messages, online advertisements, platform identifiers, hotel records, surveillance video, vehicle information, identity documents, financial records, travel records, clothing, room evidence, and witness information. Searches, seizures, extractions, and record collection shall be handled under agency policy and lawful authority.

- **Notify and consult.**

The officer shall notify a supervisor promptly when trafficking indicators are present. The officer should request a human trafficking investigator, juvenile officer, CAC contact, MDT partner, digital evidence resource, or agency human trafficking point of contact when available and appropriate.

- **Document objectively.**

The officer shall document observable facts, exact statements when possible, control dynamics, trafficking indicators, injuries, urgent needs, services offered, referrals made, evidence preserved, persons notified, and safety decisions. Reports should distinguish facts from conclusions and should avoid language that blames or criminalizes a potential victim.

## Field Screening Questions

Screening questions should be asked privately, calmly, and with a qualified interpreter when needed. Officers should avoid "why" questions, accusatory phrasing, and questions that require the person to accept the label "victim" or "trafficking victim."

Useful first-contact questions include:

- Documents, money, and communication
  - Do you have your own identification?

- Does anyone keep your identification, phone, money, medication, documents, or transportation from you?
- Are you allowed to use your phone privately?
- Does anyone read your messages, track your location, or control your online accounts?
- Work, services, sex acts, or forced criminality
  - Has anyone forced, threatened, tricked, pressured, or controlled you to work, provide services, meet customers, have sex, send images, or commit a crime?
  - Do you owe money for housing, transportation, food, drugs, protection, documents, or work?
  - Who gets the money or benefit from what you are doing?
- Threats and urgent needs
  - Has anyone threatened you, your family, your children, your housing, your immigration status, your safety, or your ability to leave?
  - Do you need medical care, food, clothing, shelter, a phone call, an interpreter, an advocate, or help getting somewhere safe?
  - Is there anyone else who may be in danger right now?

## **Immediate and Emergent Needs of Victims**

Immediate needs are part of the law enforcement response. They are not a courtesy after enforcement decisions are made.

Officers shall assess immediate needs as early as practicable. When circumstances allow, officers should make reasonable efforts to address those needs directly or through EMS, advocates, services providers, or other available resources before conducting an in-depth interview.

This guideline does not require every need to be fully resolved before officers ask safety questions or take necessary investigative steps. Brief questioning may occur when necessary to protect life, locate another victim, identify an immediate threat, identify a suspect, or preserve evidence that may be lost. Unmet needs should be considered when deciding whether to proceed with, limit, pause, or postpone an in-depth interview.

## **Safety and Access Control**

Officers shall assess whether the victim is in immediate danger and whether the trafficker, purchaser, employer, recruiter, driver, companion, family member, or other controlling person still has access to the victim.

Safety planning should consider physical access, weapons, surveillance, retaliation, threats to family members, threats involving children or pets, unsafe caregivers, social media exposure, location tracking, and whether the victim can safely leave or be contacted later.

Officers shall not disclose the victim's location, contact information, service plan, immigration information, shelter placement, or safety plan to a suspected trafficker, unsafe companion, unsafe family member, employer, purchaser, or other person who may increase risk.

## **Medical and Behavioral Health Needs**

Officers shall request emergency medical care when the victim appears injured, ill, intoxicated, overdosing, withdrawing, disoriented, malnourished, dehydrated, pregnant, suicidal, or in crisis.

Officers should pay particular attention to injuries or symptoms associated with sexual assault, strangulation, physical assault, untreated wounds, chronic health conditions, medication deprivation, substance dependency, exhaustion, and trauma-related distress.

Medical care should be offered in a calm and nonjudgmental manner. When possible, officers should explain the reason for medical evaluation and allow reasonable choice. Evidence collection shall not override emergency medical care.

### **Basic Stabilization Needs**

Officers shall make reasonable efforts, directly or through a vetted advocate or service provider, to address basic stabilization needs. These may include food, water, weather-appropriate clothing, hygiene items, restroom access, rest, emergency shelter or placement, transportation, medication access, and safe communication.

Safe communication may require use of an advocate, service provider, agency phone, replacement device, or other safe method. Officers should not assume the victim's personal phone is safe. It may be monitored, tracked, controlled by another person, or needed as evidence.

### **Communication and Access Needs**

A language barrier is not noncompliance. Officers shall obtain a qualified interpreter when needed and shall not rely on suspected traffickers, purchasers, employers, companions, unsafe family members, children, or conflicted persons to interpret except for immediate emergency safety communication until a qualified interpreter is available.

Officers shall also assess disability-related needs. Communication aids, assistive technology, simplified explanations, additional time, or specialized support may be necessary for the person to understand what is happening and make informed decisions.

Officers should use plain language and confirm understanding. A person who nods, stays quiet, or gives short answers may be afraid, confused, overwhelmed, or trying to survive the encounter.

### **Rights, Protection, and Referral Needs**

Officers shall provide rights information and referrals in a manner the victim can understand. This may include victim-witness assistance, protective-order information where applicable, medical and behavioral health referrals, legal services referrals, immigration legal referrals when relevant, crime-victim compensation information, and human trafficking service-provider contact.

Officers shall not provide legal advice unless authorized to do so. Officers should instead connect the victim with appropriate legal, victim-witness, advocacy, or immigration resources.

Services and emergency assistance shall not depend on whether the victim gives a statement, identifies as a victim, signs a complaint, participates in prosecution, or remains in contact with law enforcement.

### **Warm Handoff to Services**

When feasible, officers shall make a warm handoff to a vetted advocate or human trafficking service provider. A warm handoff means more than giving the victim a phone number. It means helping the victim make direct contact with a person or program that can assist with safety planning, shelter, medical care, crisis support, transportation, legal referrals, and longer-term stabilization.

If a warm handoff is not possible, officers shall provide available referral information, explain how to access help later, and document the reason direct connection was delayed or unavailable.

### **Refusal or Delayed Acceptance of Services**

An adult victim may refuse services. Refusal shall be documented, but refusal alone shall not end the investigation, eliminate safety planning, prevent rights information, or stop appropriate referrals.

Officers should understand that refusal may reflect fear, trauma bonding, threats, shame, addiction, immigration concerns, prior system harm, concern for children or family members, or lack of trust. A refusal at first contact does not mean the person is safe, unexploited, or unwilling to accept help later.

When the victim is under 18, or may be under 18, refusal of services does not override mandatory reporting, child-protection duties, CAC/MDT coordination, CCBYS referral when appropriate, or legally required safety action.

## **Child and Youth Victim Protocols**

Child trafficking cases require a careful, coordinated response. A child may appear defiant, loyal to an unsafe adult, hostile toward police, protective of the trafficker, or unwilling to disclose what happened. These behaviors do not rule out trafficking. They may reflect fear, grooming, trauma bonding, coercion, or survival.

For purposes of legal response under this section, child/minor means a person under 18 years of age. When a person is 18 through 24, the person is legally an adult unless another law applies, but officers should consider youth-specific services when available and appropriate.

When the person is under 18, or when age is uncertain and the person may be under 18, officers shall treat the person as a potential child victim until age is reasonably determined. The first priorities are safety, mandatory reporting, CAC/MDT coordination, careful placement, preservation of evidence, and avoidance of unnecessary criminalization

### **Required Response for a Child/Minor**

- **Treat uncertain age as a safety issue** - If the person may be under 18, officers shall proceed as if child-victim protocols apply until age is reasonably determined.
- **Do not treat commercial sexual exploitation of a child as voluntary conduct** - When a child is involved in commercial sexual activity, sexually explicit performance, pornography-related exploitation, or the exchange of sex for anything of value, officers shall treat the matter as potential child trafficking and child exploitation. The child's denial, apparent agreement, prior conduct, or use of adult language does not make the exploitation voluntary.
- **Address immediate safety and stabilization** - Officers shall determine whether the child needs emergency medical care, crisis response, safe placement, interpreter access, disability accommodation, food, clothing, rest, or protection from an unsafe adult. Stabilization should occur before any in-depth interview whenever practicable.
- **Make required child-protection reports** - Officers shall make required reports to DCFS when there is reasonable cause to believe the child may be abused or neglected, including trafficking-related abuse or neglect. Officers shall also follow applicable agency procedures for runaway, missing, locked-out, homeless, or otherwise endangered youth.
- **Notify the appropriate agency personnel** - Officers shall promptly notify a supervisor. The supervisor or responding officer shall request the agency juvenile officer, human trafficking investigator, or designated child-trafficking point of contact when available.
- **Use the CAC/MDT process** - Officers shall contact the local Child Advocacy Center or follow the county CAC/MDT protocol when a child trafficking concern is present. The CAC/MDT process should coordinate forensic interviewing, advocacy, medical and behavioral-health referrals, investigative planning, prosecutor consultation, and case review.
- **Use CCBYS or other youth crisis resources when appropriate** - When the child is runaway, locked out, homeless,

beyond control, in family crisis, or without a safe placement, officers shall follow local procedures for Comprehensive Community-Based Youth Services or another appropriate youth crisis response provider.

- **Limit initial officer questioning** - Initial questioning should be limited to what is needed to protect the child, determine identity and age, locate immediate danger, identify a suspect, identify other victims, and preserve evidence that may be lost. A full account should be obtained through the CAC/MDT or another trained forensic interview process whenever practicable.
- **Assess every adult's role before allowing access** - Officers shall not assume that a parent, guardian, caregiver, family member, romantic partner, employer, driver, or companion is safe. Before allowing access, transportation, interpretation, release, or participation in planning, officers shall assess whether the adult may be involved in the exploitation, benefiting from it, minimizing it, ignoring it, or unable to protect the child.
- **Avoid repeated interviews** - Officers shall coordinate with the CAC, DCFS or CCBYS, prosecutor, forensic interviewer, advocate, and investigator to reduce unnecessary retelling. Interview timing, location, participants, and recording requirements should be decided through the appropriate child-victim protocol.
- **Follow juvenile legal requirements** - Officers shall comply with juvenile custody, temporary protective custody, limited custody, detention, parent or guardian notification, counsel, and recording requirements under law and agency policy. If the child is also suspected of an offense, the child's possible trafficking victimization shall be considered before any enforcement decision.

## **Familial Trafficking and Unsafe Caregivers**

Trafficking may occur within a family, household, romantic relationship, or caregiving arrangement and may be hidden behind normal routines, school attendance, stable housing, community involvement, or cooperative adults. Officers shall not rely on outward appearances alone. A child/minor who appears polite, compliant, or protective of a caregiver may still be unsafe, and an adult who appears helpful may be controlling communication, coaching answers, limiting privacy, discrediting the child, or benefiting from the exploitation. Officers should create a safe opportunity for the child/minor to speak away from any adult who may influence the child's answers. When caregiver safety is uncertain, officers should document observations objectively and consult a supervisor and, as appropriate, the CAC, DCFS or CCBYS, and the State's Attorney before release, transportation, interview participation, or placement decisions..

## **Grooming and Control of Children**

Traffickers often begin by meeting a child/minor's unmet needs and may present themselves as a source of affection, protection, housing, transportation, money, drugs, online attention, or escape from instability. What appears to be a relationship, favor, job opportunity, or family obligation may become a method of control. As control increases, the trafficker may isolate the child, monitor digital activity, create debt, demand loyalty, threaten exposure, use images for blackmail, force criminal acts, or frame exploitation as love, debt, duty, or survival. Officers should focus on the pattern of control and benefit rather than waiting for the child/minor to identify the situation as trafficking.

## **Youth Trauma Responses**

A trafficked child/minor may lie, run, shut down, become aggressive, protect the trafficker, refuse services, give fragmented information, or appear unusually compliant. Officers shall not treat these behaviors as proof that trafficking did not occur. They may be survival responses caused by fear, grooming, coercion, trauma bonding, or repeated punishment. The immediate benchmark is not full cooperation at first contact. The immediate goals are safety, stabilization, evidence preservation, activation of the proper child-victim response, and maintaining a path for future disclosure. Reports should describe behavior objectively and should avoid labels such as "manipulative," "uncooperative," "promiscuous," "streetwise," or "choosing the lifestyle."

## **Adult Victims and Adults with Disabilities**

Adult victims may accept or decline services and may be reluctant to cooperate. Officers shall provide safety planning, rights information, referrals, interpreter access, and respectful communication regardless of immediate cooperation. Officers should document trafficking indicators and continue appropriate investigation even when the adult victim does not make a complete disclosure.

When the potential victim is an adult with a disability, older adult, or person who may require accommodations, officers shall assess communication, cognitive, medical, sensory, mobility, and safety needs. A forensic interviewer, disability advocate, adult protective services referral, medical provider, guardian ad litem, or other appropriate resource should be used when legally appropriate and available. Officers shall also assess whether a caregiver, guardian, employer, or support person may be involved in the exploitation or may create a conflict of interest.

## **Victim Interviews**

Human trafficking interviews are not interrogations. They are safety-focused, evidence-informed conversations with a victim or potential victim. The purpose is to protect the person, reduce fear, understand the control being used, and gather reliable information without causing unnecessary harm.

A productive interview is more likely when the victim is safe, medically stable, emotionally supported, and able to speak outside the influence of the trafficker or any other controlling person. Officers should not expect a complete account at first contact. Disclosure may occur in stages.

Nothing in this section permits officers to avoid constitutional, juvenile, disability, language-access, or suspect-interview safeguards. If a person is both a potential victim and a potential suspect, officers shall consult a supervisor and, when practicable, the State's Attorney before questioning the person about possible criminal conduct connected to the exploitation.

### **Timing of the Interview**

Victim interviews should be conducted in a manner that promotes safety, accuracy, dignity, and trust. When practicable, officers should make reasonable efforts to address safety and stabilization needs before conducting an in-depth interview.

Brief questioning may occur before full stabilization when necessary to protect life, locate another victim, identify an immediate threat, identify a suspect, or preserve evidence that may be lost.

The first interview should not be treated as the only opportunity for disclosure. In trafficking cases, information may emerge over time as safety, trust, and support increase.

### **Who Should Conduct the Interview**

Whenever practicable, the interview should be conducted by a trained investigator or officer familiar with trauma-informed trafficking response.

For a child/minor, officers shall follow Child and Youth Victim Protocols and use the CAC/MDT or forensic interview process whenever available and appropriate. Initial officer questioning of a child should be limited to safety, identity, age, location, immediate danger, and evidence that may be lost.

For an adult victim with a disability, communication need, or cognitive limitation, officers should consider whether a trained forensic interviewer, disability advocate, medical provider, or other appropriate resource is needed.

A victim advocate or service provider may be present when appropriate, lawful, and consistent with victim preference.

The advocate's role is support and stabilization. The advocate should not be used as an investigator or as a substitute for law enforcement questioning.

## **Interview Setting**

The interview should occur in a private, calm, and neutral location. The setting should allow the victim to speak without being watched, overheard, threatened, or coached.

Officers should avoid using a holding cell, booking area, crowded hallway, public lobby, or suspect interview room when a safer alternative is available.

No suspected trafficker, purchaser, employer, recruiter, driver, unsafe family member, companion, or other controlling person should be present or able to monitor the interview.

If the interview is recorded or body-worn camera remains active, the officer should explain that in plain language and follow agency policy. The officer should also explain any limits on confidentiality, mandatory reporting, and required sharing of information.

## **Before Questions Begin**

Before asking substantive questions, the officer should explain the purpose of the conversation. The explanation should be simple:

*"I am asking these questions because I want to understand whether someone is hurting, threatening, or controlling you."*

The officer should also explain the person's ability to take breaks, ask questions, request an advocate, receive services, and decline to answer questions when legally permitted.

Officers shall not promise outcomes they cannot control. They shall not tell a victim that services, shelter, immigration help, or safety depend on cooperation with prosecution.

## **Interview Method**

Officers should begin with safety and rapport. The first questions should help determine whether the person is safe now, whether anyone else is in danger, and what the person needs before continuing.

Questions should be open-ended and non-blaming. Officers should avoid "why" questions that imply fault. They should not require the person to use the words "trafficking," "victim," "coercion," or "abuse."

Officers should allow silence, pauses, breaks, and non-linear answers. Trauma may affect memory, sequence, emotional expression, consistency, and the pace of disclosure.

Inconsistencies should be clarified gently. They should not be treated as proof of deception. Officers should corroborate through independent evidence whenever possible.

Repeated interviews should be avoided. When more than one interview is necessary, the purpose should be clear and the interview should be coordinated with the investigator, prosecutor, CAC/MDT when applicable, advocate, and service provider.

## **Core Areas of Inquiry**

The interview should focus on the facts needed to understand safety, control, benefit, evidence, and risk to others.

- **Safety** - Ask whether the victim is safe now, whether anyone is watching or tracking them, and what would

happen if they left, refused, or talked to law enforcement.

- **Control** - Ask who controls the victim’s movement, communication, documents, money, housing, transportation, work, or access to help.
- **Benefit** - Ask who receives money, services, labor, images, access to the victim, or anything else of value.
- **Evidence** - Ask where officers may find records, messages, advertisements, payment information, hotel or travel information, photographs, videos, documents, or witnesses.
- **Other victims** - Ask whether anyone else may be under control, in danger, missing, injured, under 18, or unable to leave.

## Documentation and Privacy

Officers should document exact words when the victim describes threats, promises, rules, debt, punishment, fear, or control. Exact language can be powerful evidence.

Reports should distinguish facts from conclusions. They should avoid labels that blame or stigmatize the victim. Officers should avoid unnecessary disclosure of sexual history, immigration information, shelter location, service-provider communications, medical information, child-placement information, or safety plans. Sensitive information should be restricted, redacted, or placed in a protected supplemental report when allowed by law and agency policy.

Avoid	Use Instead
“Why did you go with them?”	“Can you tell me how you met and what happened after that?”
“Why didn’t you leave?”	“What made leaving unsafe or difficult?”
“Are you a trafficking victim?”	“Has anyone made you do something you did not want to do?”
“Who is your pimp?”	“Who sets up the work or decides where you go?”
“How much money do you make?”	“Who receives the money or decides how it is used?”
“Are you lying about your name or age?”	“What name and date of birth should I use to identify the right records and keep you safe?”
“Why did you keep going back?”	“What happened when you tried to leave, refuse, or avoid contact?”
“Were you doing this voluntarily?”	“Did anyone threaten, pressure, trick, or control you?”
“Why did you commit that crime?”	“Did someone tell you to do that or threaten you if you refused?”
“You need to cooperate if you want help.”	“Your safety matters whether or not you are ready to talk today.”

## Language Access and Interpreters

Language access is a safety issue, a rights issue, and an investigative issue. It may be a sign of vulnerability, fear, trauma, or control by another person.

- Provide timely, meaningful language access to persons with limited English proficiency and persons who require communication assistance.
- Use a qualified, neutral interpreter as soon as practicable. Telephone or video interpretation may be used when appropriate.
- Do not use suspected traffickers, customers, employers, recruiters, companions, family members, children, other victims, or community members with privacy or retaliation concerns as interpreters, except for immediate emergency safety communication until a qualified interpreter is obtained.
- Speak slowly, use short questions, allow pauses, and confirm understanding. Do not raise your voice or treat confusion as resistance.
- Document the interpreter's name or identifier, language, method of interpretation, and any limitations.
- Provide translated rights forms, service information, and safety planning materials when available and appropriate.

## **Human Trafficking Investigations and Evidence Collection**

Human trafficking investigations shall focus on the people and entities that control, exploit, purchase, recruit, transport, facilitate, or benefit from trafficking. Victim safety and offender accountability are not competing goals. A careful investigation protects the victim, preserves evidence, and builds a case that does not depend only on the victim's first statement.

Investigators shall develop an evidence plan as early as practicable. The plan should identify what must be preserved, what legal authority is needed, what resources should be activated, and what steps are necessary to protect the victim from retaliation or further harm.

### **Investigation Priorities**

A human trafficking investigation should answer five core questions:

1. **Who is being controlled or exploited?**  
Investigators should identify actual and potential victims, including children, adults, adults with disabilities, foreign national victims, workers, family members, and others who may be under the control of the same trafficker or network.
2. **Who is exercising control?**  
Investigators should determine who controls the victim's movement, communication, identification documents, money, housing, work, transportation, online accounts, or access to help.
3. **Who benefits?**  
Investigators should identify who receives money, labor, services, commercial sexual access, housing payments, transportation payments, debt payments, digital payments, or anything else of value.
4. **Where is the corroboration?**  
Investigators should look for evidence that supports or explains the victim's account. That evidence may exist in phones, online platforms, hotel records, business records, financial records, travel records, medical records, surveillance video, and witness statements.

**5. Who else may be at risk?**

Investigators should assess whether there are other victims, children, co-workers, roommates, family members, witnesses, or persons being threatened, moved, monitored, or silenced.

**Evidence Plan**

Investigators shall seek independent corroboration whenever possible. The evidence plan should be organized around what the evidence helps prove, not merely around the type of item collected.

Evidence Area	What It Helps Prove	Policy Direction
Digital and online evidence	Recruitment, grooming, threats, monitoring, advertising, scheduling, payment, movement, identity, and contact between suspects, victims, purchasers, or facilitators.	Preserve original digital evidence when lawful. Screenshots may be useful, but they should not replace preservation of the original source when original evidence can be lawfully obtained. Request digital forensic support when needed.
Location and business records	Where exploitation occurred, who controlled the space, who paid for it, who had access, and whether there was a pattern across rooms, worksites, vehicles, or businesses.	Identify records that may be overwritten or deleted. Use consent, subpoena, preservation request, warrant, or other lawful process when required.
Financial and benefit evidence	Who profited, who controlled money, whether debt was used, whether wages were withheld, and whether proceeds were moved through cash, cards, accounts, apps, or third parties.	Follow the money. Document who received value and how payments were collected, transferred, deducted, or concealed.
Travel, movement, and identity evidence	How the victim was moved, who arranged transportation, whether documents were controlled, and whether the victim could leave freely.	Document who possessed identification documents, tickets, vehicle access, lodging access, and travel records. Handle victim documents in a manner that preserves evidence without unnecessarily interfering with safety or services.
Labor and worksite evidence	The terms of work, recruitment promises, hours, wages, housing, transportation, debt, safety conditions, and control over movement or communication.	Treat labor violations as possible trafficking indicators when coercion, control, threats, debt, or inability to leave are present. Coordinate with labor, licensing, regulatory, and prosecutorial partners when appropriate.
Physical, medical, and forensic evidence	Injury, assault, sexual assault, restraint, unsafe living or working conditions, substance control, neglect, and other forms of harm or control.	Medical care comes first. Sexual assault and medical-forensic evidence shall be handled under applicable law, medical protocols, and agency policy.
Testimonial and witness evidence	Corroboration from witnesses who observed control, movement, payment, threats, repeated visitors, work conditions, injuries, or suspect behavior.	Interview witnesses without exposing victim statements, location, service plan, or safety information unless disclosure is lawful and necessary.

## **Digital Devices and Victim Property**

Digital devices may be both evidence and a victim's lifeline. A phone may contain messages, advertisements, payment records, location data, threats, images, and suspect contacts. It may also be the victim's only way to reach an advocate, shelter, family member, transportation, medical care, or legal help.

Digital devices shall be searched, imaged, extracted, or retained only with consent, a warrant, a lawful exception, or other legal authority. Investigators shall explain the reason for any requested access whenever doing so will not compromise safety or the investigation.

When a victim-owned device is needed as evidence, investigators should consider options that preserve the case while reducing harm to the victim. Options may include forensic imaging, targeted preservation, photographs of relevant material, screenshots when appropriate, prompt return of the device, replacement communication options, or other lawful alternatives consistent with agency evidence policy.

Devices shall be protected from remote wiping, alteration, deletion, or loss using agency-approved methods. If a device cannot be accessed because of encryption, passcode protection, damage, compatibility issues, or technical limitations, investigators should consult a digital evidence specialist.

## **Child Sexual Abuse Material and Online Exploitation Evidence**

Evidence involving suspected child sexual abuse material shall be handled only by authorized personnel under specialized evidence procedures. Officers shall not copy, forward, display, or redistribute suspected child sexual abuse material except as specifically authorized by law and agency policy.

When a case involves a child, online exploitation, sextortion, AI-generated sexual imagery, deepfakes, grooming, or platform-based recruitment, investigators should consult appropriate cyber, ICAC, prosecutor, or digital forensic resources as early as practicable.

## **Sexual Assault and Medical Evidence**

When sexual assault, sexual abuse, strangulation, physical assault, pregnancy-related concerns, overdose, withdrawal, malnutrition, or untreated medical needs are alleged or suspected, officers shall prioritize medical care and follow applicable sexual assault response law, medical-forensic procedures, and agency policy.

Victim consent, medical stabilization, privacy, and trauma-informed communication remain central throughout the evidence process. Evidence collection should be coordinated so that it supports the investigation without delaying urgent care or unnecessarily retraumatizing the victim.

## **Operations and High-Risk Locations**

Any operation likely to encounter actual or potential victims shall include a victim-centered response plan.

The operational plan should answer these questions before contact is made:

- 1. Who is in charge?**

The plan should identify the supervisor, lead investigator, and decision-maker for victim safety issues.

- 2. How will victims be protected?**

The plan should explain how potential victims will be separated from controlling persons, where they will be taken, who will speak with them, and how urgent needs will be addressed.

- 3. What happens if the victim is a child or may be a child?**

The plan should identify the CAC/MDT process, child-protection reporting process, CCBYS or youth crisis

resource, and forensic interview plan.

4. **How will services be activated?**

The plan should identify the advocate or service provider, after-hours contact method, transportation plan, interpreter process, and medical response.

5. **How will evidence be preserved?**

The plan should identify the digital evidence process, video or business-record preservation steps, suspect interview plan, and prosecutor contact for warrants or legal process.

6. **When should outside partners be consulted?**

The plan should identify when to contact the State's Attorney, MDT, ICAC, ISP, HSI, FBI, labor or regulatory partners, or other specialized resources.

## **Evidence and Victim Safety**

Investigators shall not expose a victim's location, service provider, shelter placement, immigration information, medical information, child-placement information, or safety plan through unnecessary evidence requests, reports, witness contacts, media communications, or suspect interviews.

If evidence collection may increase risk to the victim, investigators shall consult a supervisor and, when practicable, the prosecutor before proceeding. The goal is to preserve evidence without recreating the trafficker's control, increasing retaliation risk, or cutting the victim off from safety and services

## **Suspect and Witness Interviews**

This section applies to interviews of suspects, purchasers, facilitators, employers, witnesses, and other non-victim parties. If an officer develops information that a person being interviewed as a suspect or witness may also be a victim or potential victim, the officer shall stop and reassess the person's status before continuing.

Suspect and witness interviews shall be conducted in a way that protects victim safety, preserves investigative integrity, and complies with constitutional requirements, agency policy, recording law, language-access requirements, juvenile protections, and prosecutor guidance.

### **Suspect Interviews**

A suspect interview should be planned around the elements of control, benefit, knowledge, and corroboration. Investigators should avoid relying on labels such as "trafficking," "pimping," "forced labor," or "victim" as the starting point. Suspects rarely describe their conduct in legal terms. They often reveal the offense through explanations about rules, money, movement, debt, discipline, work, housing, transportation, or relationships.

The interview should develop evidence in the following areas:

- **Conduct** - Determine what the suspect did to recruit, entice, harbor, transport, provide, obtain, maintain, control, supervise, advertise, employ, purchase, or benefit from the victim.
- **Control** - Determine how the suspect influenced the victim's movement, communication, work, housing, documents, money, access to help, contact with family, or ability to refuse.
- **Benefit** - Determine who received money, labor, services, commercial sexual access, rent, transportation payments, digital payments, drugs, lodging, advertising value, debt payments, wages, or anything else of value.

- **Knowledge** - Determine what the suspect knew about the victim's age, vulnerability, housing status, immigration concerns, disability, dependency, debt, substance use, fear, lack of transportation, or lack of freedom to leave.
- **Corroboration** - Determine where supporting evidence may be found, including devices, accounts, messages, advertisements, payments, business records, hotel records, travel records, witnesses, vehicles, and locations.

## **Witness Interviews**

Witness interviews should seek independent corroboration while protecting victim privacy and safety. Witnesses may confirm control, movement, payment, lodging, work conditions, injuries, threats, repeated visitors, digital activity, or unusual behavior even if they do not recognize the conduct as human trafficking. Officers should ask what the witness personally observed, how the witness knows the victim, suspect, location, vehicle, room, account, advertisement, worksite, or transaction, and what records or digital evidence may exist. Officers shall not disclose victim statements, service plans, shelter information, medical information, immigration information, child-placement information, or safety plans unless disclosure is necessary, lawful, and consistent with investigative strategy. Witnesses shall not be asked to contact the victim, confront the suspect, collect evidence, or take any action that may increase risk unless it is part of an approved investigative plan. When witnesses have confidentiality obligations, including medical personnel, school personnel, advocates, or service providers, investigators should consult the prosecutor before seeking protected records or communications.

A witness interview should answer four questions:

1. **What did the witness personally observe?** The report should separate firsthand observations from assumptions, rumors, or information learned from someone else.
2. **How does the witness know the victim, suspect, place, account, vehicle, room, worksite, advertisement, or transaction?** The relationship between the witness and the evidence should be clear.
3. **What records or digital evidence may exist?** The witness may know where video, reservations, access logs, employment records, payment records, messages, advertisements, or platform information can be found.
4. **What safety concerns exist?** The witness may be afraid of retaliation. The victim may also face increased risk if the witness is contacted carelessly or if the witness repeats information to the suspect.

## **Arrest, Citation, and Custody Decisions Involving Potential Victims**

Arrest, citation, detention, or custodial placement of a potential victim shall not be used as a routine means to secure cooperation, obtain information, or provide protection. Such action may occur only when legally authorized and after consideration of victim safety, available alternatives, statutory protections, and collateral consequences.

- Securing probable cause against a person reasonably believed to be a trafficking victim should not be the primary focus of the investigation.
- Before arresting or citing a potential victim for a trafficking-related or survival-related offense, the officer shall consult a supervisor when practicable and consider service placement, shelter, medical care, protective custody, CAC/CCBYS/DCFS referral, victim-witness assistance, or other lawful alternatives.
- If no safe alternative exists and enforcement action is considered necessary for immediate safety, public safety, or another lawful reason, the officer shall consult the State's Attorney when practicable and document the specific facts supporting the decision.
- For minors, officers shall follow juvenile procedures and consider statutory protections, defenses, diversion, and

the child's trafficking victimization before any enforcement action connected to exploitation.

- Officers shall not threaten victims with arrest, deportation, loss of custody, denial of medication, denial of shelter, or denial of services to compel cooperation.
- A person may be both a victim and a suspect. These cases require careful supervisory and prosecutor review, documentation of coercion indicators, and a balanced assessment of victim safety, public safety, and legal requirements.

## **Supervisor's Duties**

Supervisors determine whether a trafficking case becomes a missed opportunity or a coordinated, legally sound response. Supervisors shall ensure that actual or suspected human trafficking incidents are managed in a manner that protects victims, protects officers, preserves evidence, coordinates resources, and complies with law and policy.

- Confirm scene safety, victim/suspect/witness separation, officer assignments, medical response, advocate activation, interpreter access, and child-protection reporting when applicable.
- Review indicators of force, fraud, coercion, control, financial benefit, minor status, or forced criminality identified by officers.
- Assign or request a specialized investigator, agency human trafficking coordinator, juvenile officer, CAC, MDT contact, digital-forensics resource, or federal partner when appropriate.
- Ensure that officers do not use arrest, detention, or threat of prosecution as a means to obtain victim cooperation or as a substitute for shelter or safety planning.
- Consult the State's Attorney early on charging, warrants, subpoenas, preservation requests, victim status, juvenile issues, suspect interviews, and evidentiary needs.
- Review reports for victim-centered language, required referrals, safety concerns, documentation of indicators, evidence preservation, rights notification, interpreter use, and confidentiality concerns.
- Ensure that any decision to arrest or charge a potential victim for conduct connected to exploitation is reviewed by a supervisor and, when practicable, the State's Attorney.
- Document and elevate service gaps, interpreter gaps, shelter/placement problems, CAC or forensic interview barriers, digital evidence limitations, and MDT coordination issues.
- Conduct debriefings after significant incidents or operations, including attention to officer wellness due to repeated exposure to traumatic material.

## **Prosecutor, MDT, State, and Federal Coordination**

Human trafficking cases often cross disciplines, jurisdictions, and systems. Agencies shall establish procedures for early coordination with prosecutors, CACs, child welfare, service providers, victim-witness personnel, medical providers, state and federal partners, and multidisciplinary teams.

### **State's Attorney and Prosecutor Coordination**

Consult the State's Attorney or other appropriate prosecutor as early as practicable for charging strategy, warrants, subpoenas, preservation requests, search and seizure, victim safety, juvenile issues, immunity or diversion

considerations, restitution, forfeiture where applicable, and coordination with federal partners.  
Consult before arresting or charging a potential victim for conduct potentially connected to trafficking when practicable.

Seek guidance where the victim is a child, youth, adult with disability, foreign national, person facing criminal exposure, or where the case involves multiple jurisdictions, CSAM, labor trafficking, organized networks, or multiple victims.

Coordinate victim-witness support, court notification, protective conditions, no-contact orders, restitution, and confidentiality issues.

## **MDT and Federal Coordination**

Refer to or consult with the appropriate MDT, MDHTTF, CAC, ICAC, ISP, HSI, FBI, U.S. Attorney, Department of Labor, DCFS, DHS/CCBYS, or other partner when the facts indicate jurisdictional, service, child-protection, labor, digital, immigration, or organized-crime issues.

Use coordinated case planning to reduce duplicate interviews, protect confidentiality, prevent service gaps, and preserve investigative integrity.

Use shared protocols for referrals from the National Human Trafficking Hotline, state or local tip lines, traffic interdiction, hospitals, schools, hotels, labor/regulatory partners, and community members.

Information sharing shall comply with law, victim safety, juvenile confidentiality, records restrictions, advocate privilege or confidentiality rules, and investigative needs.

## **Survivor Advocates, Service Providers, and Aftercare**

Survivor safety is not complete when the scene is cleared or the suspect is arrested. Trafficking victims may still face retaliation, homelessness, medical needs, trauma symptoms, substance-use needs, immigration concerns, debt, loss of documents, public exposure, fear for family, and pressure to return. Aftercare is not outside the case; it is part of stabilizing the victim and protecting the investigation.

Connect actual or potential victims to vetted human trafficking service providers as early as practicable.  
Offer services regardless of whether the victim immediately cooperates, signs a statement, participates in prosecution, remains in contact, or identifies as a victim.

Maintain an updated local resource list with 24-hour contacts for trafficking advocates, emergency shelter, CAC, DCFS/CCBYS, sexual assault/domestic violence advocacy, medical forensic services, behavioral health crisis response, substance-use support, disability accommodations, interpreter access, civil legal services, immigration legal services, victim-witness assistance, and task force partners.

When practicable, use warm handoffs and allow advocates to support safety planning, emotional stabilization, emergency needs, legal referrals, and continuity of care.

Proactively meet with service providers and advocates before cases arise to clarify roles, confidentiality, response times, referral procedures, after-hours access, shelter limits, transportation needs, and contingency plans.

Do not disclose victim location, service-provider location, safety plan, or advocacy involvement unless legally required and safe.

## **Specific Populations and Foreign National Victims**

Officers shall not stereotype or assume trafficking solely based on status, occupation, neighborhood, race, ethnicity,

immigration status, gender identity, sexual orientation, disability, poverty, substance use, or prior criminal justice involvement. At the same time, officers shall consider vulnerabilities and barriers that traffickers exploit.

Children and youth, including runaway, homeless, foster-care-involved, juvenile-justice-involved, school-disconnected, LGBTQ+, and previously abused youth.

Immigrants, refugees, migrants, asylum seekers, foreign nationals, and persons with limited English proficiency. Persons with physical, intellectual, developmental, psychiatric, sensory, or communication disabilities.

Men and boys, LGBTQ+ persons, transgender persons, and persons estranged from family or community support. Persons experiencing homelessness, poverty, substance use disorder, mental health crisis, domestic violence, sexual assault, coercive control, debt, or dependence on trafficker-provided housing, drugs, transportation, or income.

Workers in isolated, low-wage, cash-based, temporary, agricultural, domestic, hospitality, restaurant, construction, cleaning, massage, elder-care, traveling sales, or other vulnerable labor settings. Rural victims and victims in small communities where privacy, retaliation, transportation, and service access may be more difficult.

## **Foreign National Victims and Immigration-Related Tools**

Officers shall provide or request a qualified interpreter and avoid using employers, recruiters, companions, family members, suspects, or other conflicted persons as interpreters. Comply with the Illinois Trust Act and agency policy. Do not stop, detain, or continue to detain a person solely based on citizenship or immigration status.

Officers shall not ask about immigration status unless the information is necessary for safety, services, investigation, or a legally required process. Document the reason when immigration-related information is collected. Do not threaten immigration consequences or suggest that services depend on immigration status or prosecution cooperation.

When immigration relief, replacement documents, safety planning, or related legal needs may be relevant, officers shall refer the victim to qualified immigration legal services or a vetted victim service provider. Requests involving Continued Presence, T visa, U visa, or other law-enforcement certification shall be routed to the designated agency coordinator, legal advisor, prosecutor, or appropriate federal partner under agency policy.

## **Documentation, Privacy, Records, and Data**

Officers shall document human trafficking contacts in objective, fact-specific language that distinguishes observed facts, reported statements, and investigative conclusions. Reports should include trafficking indicators, safety concerns, immediate needs, interpreter use, disability accommodations, services and rights information offered, services accepted or declined, mandated reports, supervisor notifications, prosecutor or partner consultations, and evidence-preservation steps. Reports shall avoid victim-blaming language and shall protect sensitive information, including shelter location, safety plans, medical information, immigration information, juvenile information, advocate involvement, and service-provider communications, consistent with law and agency policy.

## **Training, Review, and Quality Assurance**

The Agency shall ensure that officers and relevant personnel receive Board-approved or agency-approved training on victim-centered, trauma-informed detection, investigation, and response to human trafficking.

The agency human trafficking coordinator or designee shall maintain the resource list, service-provider contacts, interpreter process, CAC/CCBYS/DCFS contacts, prosecutor contacts, MDT contacts, federal partner contacts, and medical/shelter resources.

The agency shall review this policy at least annually and after statutory changes, Board guidance, critical incidents, major operations, or identified system gaps.

Command staff should review a sample of human trafficking-related reports or operations to assess policy compliance, service coordination, evidence quality, documentation, interpreter access, and victim-safety outcomes.

Identified gaps in service availability, interpreter access, child placement, evidence capacity, officer training, or partner coordination shall be documented and elevated through the chain of command.