

April 8, 2022

CALIFORNIA DEPARTMENT OF SOCIAL SERVICES

EXECUTIVE SUMMARY

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This letter introduces and outlines how caregivers, including resource parents, parents or guardians, and residential staff, can implement, apply, and utilize harm reduction strategies with youth who have experienced commercial sexual exploitation within the home setting.

HARM REDUCTION SERIES

CAREGIVER

2021

CHILD TRAFFICKING
RESPONSE UNIT



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Caregivers Role in Utilizing Harm Reduction Strategies with Commercially Sexually Exploited Youth



A caregiver of a youth in foster care holds a unique and challenging role. Caregivers are often required to balance varying responsibilities and roles. In addition, caring for a youth who is not your own, in a home that is not their own, is difficult for both parties. Regardless of how abusive a youth's home environment was, it is still their home and a place where they may have found comfort and identity. A youth entering a placement is often immediately in survival mode, unsure of what to expect, and may make assumptions to reconcile their new placement with their previous experiences. For example, a youth may assume they are expected to act a certain way, be an immediate member of the family, or are solely wanted for the money the caregiver receives.

Therefore, these caregivers are charged with the difficult task of providing an environment that is safe, patient, nurturing and supportive for a youth who may struggle to see it as such.

Caring for children who have experienced commercial sexual exploitation is particularly difficult due to many factors. The most challenging of which is the acceptance and understanding that recovery and healing is not immediate, nor consistent. More importantly, it is not always within the control of the caregiver or service provider. This is due, in part, to the complex trauma associated with exploitation, the exploiter's manipulation of the youth, and the youth's reluctance to access services or remain in placement. Agencies and partners also lack specialized resources and training on how to best engage this population. This results in difficulty engaging in appropriate services, maintaining safety and building trust. All youth, and especially children who have experienced commercial sexual exploitation, require a practice approach that is flexible, consistent, culturally sensitive and focused on serving a youth's whole being, not solely their exploitive experiences.



For the purpose of this guidance, caregivers are defined as resource families, including non-relative extended family members (NREFM) and relatives, Short Term Residential Therapeutic Program (STRTP) staff, Tribally Approved homes, Indian custodians, birth or adoptive parents, and legal guardians. Utilizing a harm reduction approach can be especially uncomfortable for caregivers as it acknowledges that youth may continue to engage in risky behaviors, which, in this context, may mean interactions with exploiters and/or purchasers. Contrary to traditional approaches, harm reduction instead prioritizes long-term safety; recognizing lasting change is not immediate, building trust takes time, and that returning to exploitive situations does not prevent a youth from making progress toward healing. Harm reduction is grounded in the principle that short-term incremental gains will lead to long term stability and safety.

Harm reduction recognizes that change is both an internal and external process. Caregivers play a critical role in shaping the external process, serving as the parent or substitute parent, responsible for meeting the youth's basic needs daily, while navigating and coordinating the systems of care that deliver services to the youth. Youth whose needs are not being met by these systems may be more vulnerable to exploitive

situations. Thus, caregivers have direct impact over the external changes necessary to ensure the totality of a youth's needs are met, and more specifically the needs that the exploitive situation was, or currently is, meeting. By meeting these needs, youth begin regaining their independence and capacity to make internal changes—a key tenet of harm reduction.

Adoption of Harm Reduction in Philosophy and Practice

To ensure systemic adoption, the harm reduction approach must be incorporated within the placement setting as well as amongst service providers and the leaders of the agency licensing or approving the placement. Systemic adoption is critical in effectively implementing and reaching intended outcomes, which include: building the youth's confidence and independence, establishing healthy relationships with adults, achieving lifelong safety, and readily accessing appropriate resources, among others. Harm reduction aims to not only reduce the harmful impacts of commercial sexual exploitation (CSE), but to also build relationships, enhance self-agency, and provide unconditional support so that a youth may safely depart the exploitive situation.

Furthermore, systems of care must philosophically support the harm reduction approach, which may be viewed as a departure from traditional approaches to practice. As harm reduction continues to be implemented, awareness, education and training must be provided beyond the primary placement provider and extend to all individuals invested in the youth's wellbeing and safety. This includes foster family agency (FFA) social workers, STRTP administrators, trainers responsible for instructing caregivers, respite care providers, and other support staff such as in-home counselors, or peer and parent partners. Agency wide adoption of the harm reduction approach will ensure the support of caregivers as they work to effectively utilize harm reduction strategies.

To further support the use of harm reduction within the placement setting, providers and their county partners should assess for the appropriateness of keeping a placement open for a youth missing from care. Many youth who experience CSE may leave placement without permission to facilitate activities connected to exploitation. When a placement is closed as soon as a youth leaves, they are left without secure housing which may increase their reliance on exploitation for survival. While not always viable, keeping a placement open to a youth missing from care demonstrates dedication to the youth's recovery while attempting to meet their basic needs (placement) despite their absence. As such, a placement provider can hold the placement for a missing youth up to 14 days while still drawing down Title IV-E funding. After the 14 days, counties have the discretion to continue funding the vacant placement using other resources in anticipation of a likely return by the youth. This collaborative decision is a means by which systems can adopt a harm reduction approach, communicating consistency and compassion for CSE youth. For further information, relative to a youth's "temporary absence" from care, please reference [ACL 07-49](#)¹. If funding is a challenge, those counties who have opted into the commercially sexually exploited children (CSEC) program established under Welfare and Institutions Code Section 16524.7 can utilize their CSEC program dollars to hold beds or supplement basic board and care rates. For more information on allowable expenditures for CSEC funding, please see the attachment in [ACL 17-71](#)².



Awareness, education and training must be provided beyond the primary placement provider and extend to all individuals invested in the youth's wellbeing and safety.

Scenario

Below is a hypothetical scenario that will be used to demonstrate ways a caregiver, whether resource parent or STRTP provider/staff, can utilize a harm reduction approach while caring for a dependent youth or youth in foster care who has experienced commercial sexual exploitation:

Rose is a 16-year-old female who has been in the child welfare system for two years. She was recently recovered in an operation orchestrated by local law enforcement and identified as a victim of commercial sexual exploitation. At the time, she had been absent from her placement for approximately two weeks. Rose has since been awaiting placement at the local county assessment center. She maintains contact with her exploiter and has struggled with remaining in any placement. She does not feel a placement

will ever work for her but has agreed to give a new foster home a try; though has little faith she will ever be in one long term. Rose experiences feelings of loss daily, misses her family and distrusts most adults in her life. She is on probation for misdemeanor battery charges. Rose has not been to school consistently in several months, nor engaged in any services; however, has a wraparound team in place making efforts to support her.



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Assist youth in defining their own basic needs. Recognize that meeting basic needs goes beyond what a youth needs to simply “get-by.”



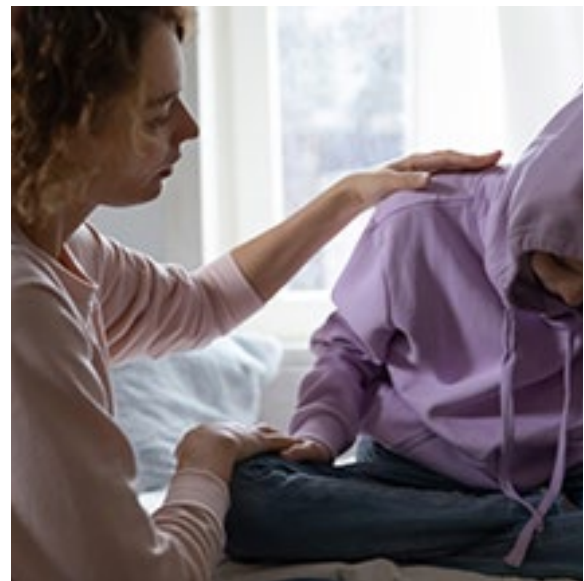
Immediate Needs and Well-Being

Rose's trauma history and experience in care has made it difficult for her to find and/or feel stability and permanence in any setting. This has increased her vulnerabilities, easily affording her exploiter the opportunity to step in and meet needs not previously met. In the above scenario, Rose's new caregiver has the opportunity to engage, support and develop their relationship from a harm reduction perspective. Upon Rose's first night in her

new home, her caregiver, Anna, spends time showing her the house and her bedroom. Anna allows Rose space and time to settle in and returns asking Rose about her favorite meal. Anna picks this food item up for dinner and while eating, begins getting to know Rose. She asks Rose what she would like in her new bedroom and if she would like to go shopping the next day for clothes, hygiene products and any favorite food or snack items.

Other Strategies to Consider

- Discuss expectations for the home, including first asking the youth about their own expectations and needs.
- Discuss what the youth has liked about previous placements, asking the youth to share what has worked for them.
- Understand that as a caregiver you are accustomed to your own family dynamics, it is difficult as a youth to come in and readjust and learn those dynamics in each placement. Likewise, a youth may have their own set of dynamics that you as a caregiver will also have to learn and adjust to.
- Assist youth in defining their own basic needs. Recognize that meeting basic needs goes beyond what a youth needs to simply “get-by.”
- Ask if the youth is from a Tribe. If so, research any available Tribal clinics, traditional events and workshops to attend together, if appropriate. Assist in facilitating the youth’s connection to their Tribe. For those caring for Indian children, [the Indian Child Welfare Act for Kin Caregivers and Foster Parents guide](#)³ provides helpful information.
- Inquire with the youth’s social worker if there are any Tribal Court Protective Orders.
- Inquire if youth is or wants to be connected to any religious services, activities or ceremonies and ensure they have the opportunity to participate if desired.
- Engage in conversations around how a youth feels safe, loved, valued, and respected – implement those strategies within your home. For example, if the youth shares they feel cared for when simply asked how their day was, then make every effort to ask them how their day was every single day. Recognizing however, that the youth may choose not to answer more often than not but continuing to ask demonstrates genuine care.
- Use nonjudgmental verbal and nonverbal communication when discussing any of the youth’s history or present circumstances.
- Support the youth’s access to medical care, including sexual and reproductive health services.
- Take youth shopping and allow them to select their preferred personal hygiene products and snacks/meals to keep in the home.
- Allow space for a youth to display and keep their personal possessions safe, recognizing that possessions are directly linked to a youth’s identity.
- Take the time to orient the youth to the neighborhood/community/school. This is a great opportunity to build rapport but also make the youth feel comfortable in their new environment.
- Discuss the youth’s physical and emotional safety as it relates to the placement. Discussing the neighborhood and its location, whether or not the home is locked and/or has an alarm, is the youth sharing a room, can the youth take space as needed, etc.



Engage in conversations in how a youth feels safe, loved, valued, and respected.



- Acknowledge every success, no matter how minimal it may seem. For example, if getting to school on time is a challenge and a youth successfully makes it to school one day that week, acknowledge this as progress and success.
- Consistently reach out to the youth during absences from placement, even if they do not respond. Inquire if they need food or offer to pick them up. Remind them they are welcome back. This consistency demonstrates authentic concern and care.
- Create and support access to age appropriate social/extracurricular activities, not allowing their exploitive history to impact their participation.
- Using [*Reasonable and Prudent Parent Standards \(RPPS\)*](#)⁴, encourage youth to engage in pro-social activities they have not been exposed to previously. Connect youth to their interests and hobbies. Utilize the child and family team (CFT) to eliminate any and all barriers to achieving this.
- Ensure youth has access to a regular and consistent allowance. This is an important point of security for exploited youth. If possible, allow youth opportunities to earn extra money outside of their allowance through other creative means.
- Create opportunity for the development of job-readiness and life skills, being cognizant of what a youth really needs. For example, they may not be ready for a budgeting class if they have never learned about saving money.
- For placement provider leadership teams, consider developing a strategic plan for how to support youth placed after-hours and on weekends, particularly when an administrator or social worker is not immediately available to meet with the youth. Create a plan that is welcoming, informative, and assesses for, but more importantly meets basic needs straightaway. This plan may also include creating an initial safety plan to help youth feel safe and supported in those first few days when they are trying to get acclimated and may be more likely to run. Consider establishing a code word youth can use when feeling fearful, anxious or uncomfortable. Ensure staff are aware of this strategic plan and trained to effectively utilize and implement it. Ensure resources are readily available and accessible to meet the needs a youth immediately identifies.

Safety Planning

A caregiver spends the most time with a youth and thus it is imperative they are not only familiar with, but also understand their pertinent role in a youth's safety plan. In this situation, Anna acknowledges that she understands Rose does not want to be in placement and specifically engages in conversation around ways or things Rose might need to make remaining in placement a little easier. Anna also asks Rose what "safety" means to her and learns ways she as

a caregiver can support that definition. On the contrary, some youth may have difficulty identifying what it is that makes them feel safe; however, are able to identify what does not make them safe. Exploring this aspect is equally as important. More importantly, Anna works with Rose and her CFT to help Rose develop a plan that details whom Rose identifies as safe and important people, as well as how she can remain safe should she decide to leave placement.

Other Strategies to Consider

- Acknowledge that for safety reasons, some youth in the home may have different rules, boundaries, and safety plans. While this may feel unfair to the youth, giving them the space to talk these feelings through and offering explanations when appropriate will help the youth feel validated. When appropriate, make space for compromise and include the youth's team in this discussion and decision.
- Recognize that leaving and even returning to exploitive situations can be a common occurrence and should not deter nor be a barrier to engagement. Further, leaving and returning to exploitive situations does not prevent progress in a youth's healing. As such, normalize feelings of anxiety and urges to leave placement and discuss it realistically. For example, sharing "I really care for you and would be sad to see you leave, but I understand how hard it must be to stay here. As much as I wish you would not go back out there, I want you to know you can still come back here. This is your home."
- Together with the youth, identify potential triggers within the placement environment and come up with a plan on how as a caregiver, you can support the youth in those moments. Asking questions such as, "what does it look like when you are feeling anxious to leave? Or when it feels like things are starting to spiral out of control?" Develop steps and actions the youth can take to prevent or lessen the impact of those moments. Perhaps it's taking a walk, a field trip to their favorite restaurant, or simply needing quiet space.





- Acknowledge the youth's feelings of connectivity to their exploiter, or others involved in the exploitive situation, if applicable. This illustrates to the youth that their feelings are of value and not shameful, conveying safety and trust. This can later be used as a platform to discuss healthy relationships and assist the youth in defining what love looks and feels like to them. In addition, it is a way to begin identifying the needs the exploiter was fulfilling within a youth, outlining which needs may be able to be more effectively met in the placement setting.
- Understand some youth may not be ready or willing to participate in "system identified" services. Work with the youth and their CFT to identify other services, or activities, that are of particular interest to the youth. Empower them to create their own plan.
- Develop appropriate strategies and plans with the youth's CFT for what should occur when the youth returns to care following an absence from placement. Consider whom the youth may contact, how basic needs will be assessed and provided, and most importantly how a youth will be engaged and reintegrated upon return to care. How the youth is received and welcomed back can impact their feelings of importance and value. For additional best practice guidance around this please refer to [ACIN I-14-19⁵](#).
- Identify ways for a youth to maintain safety in other domains beyond physical, such as emotional, relational and meeting basic needs. For example, how can a youth stay safe when needing to get from one point to another – asking a safe support person for a ride instead of hopping a turn style at the light rail. Or, locating a free clinic in case of an emergency, ensuring the youth always has a copy of their insurance card.

Teaming

A collaborative approach is essential to effectively serving youth who have experienced [commercial sexual exploitation](#)⁶. A youth's CFT, if applicable, is key in meeting the totality of the youth's needs, and thus it is critical to a caregiver's ability to successfully care and support a CSE youth. More importantly, it is imperative caregivers recognize the importance of their role not only

in a youth's life, but also as a member of their CFT. In the scenario above, Anna works with Rose's social worker to arrange for a teaming meeting to be held at the home, focusing on inviting those whom Rose has identified as important to her, as well as identifying ways Rose can be supported during yet another transition in her life.

Other Strategies to Consider

- *Make every effort to attend all meetings involving the youth, demonstrating investment and commitment to their well-being.*
- *Consider opening your home to the youth's support system, specifically the informal supports. For example, if the youth has a cousin, or peer, whom they view as a support person, invite them over for dinner, if appropriate, and get to know them.*
- *Communicate openly with the youth and the assigned social worker or probation officer.*
- *Request support from the social worker to identify the educational liaison for the school.*
- *Maintain consistent contact with the youth's therapist to determine common triggers and which healthy coping strategies they are working to utilize.*
- *Advocate for the inclusion of a peer advocate on the youth's CFT.*
- *Utilize the CFT at all times, but especially in times of crisis. Identify who on the team is available after hours to provide additional support as needed.*
- *Develop a plan with the CFT as to how each will respond when and if a youth were to leave placement and subsequently return.*
- *For providers, work with your Licensing Program Analyst (LPA) through Community Care Licensing to identify any areas of concern with regard to safety and/or liability. Recognize the LPA as a part of your team in providing support to the youth in your home.*
- *Speak with the youth's social worker about connecting to a Tribal Representative surrounding appropriate supports and/or resources from the youth's Tribe if applicable.*



Ongoing Engagement

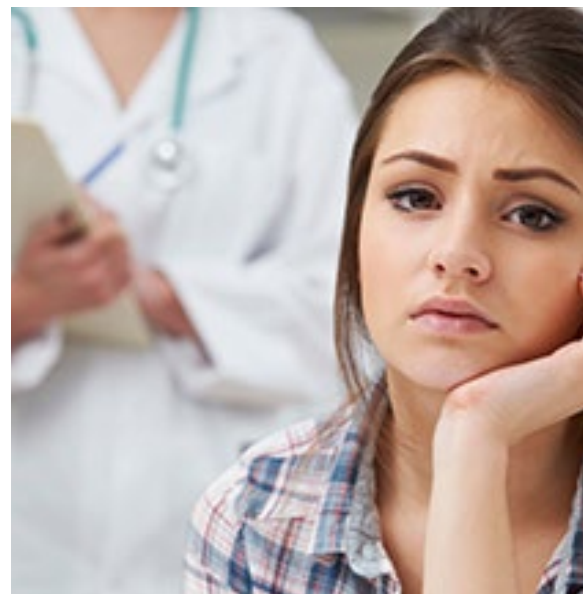
The given scenario describes when a youth is initially placed in a new setting, and how a caregiver, whether resource parent or STRTP provider, can support a youth in that transition.

However, a harm reduction approach should be utilized and applied in all situations and instances of engagement with a youth who has experienced commercial sexual exploitation:



- Engage with the youth holistically. Remember that they are more than just their exploitive experience and hold their own interests, hopes and dreams.
- Recognize the exploitive situation may have taught the youth that love is conditional upon their behavior; as caregivers you can change that narrative and demonstrate that it is unconditional – that it does not have to be earned.
- Let the youth know that they are not expected to be anyone but themselves in the home, and that they are welcomed, wanted, safe and cared for-and that the role they play can and will be defined by them alone.
- Openly discuss expectations-allowing the youth to share what they expect from you as a caregiver and conversely what you expect from them as a member of the home.
- Discuss parameters for privacy. Allow the youth to share what privacy looks like to them and find ways to honor those wishes.
- When a youth acts out negatively, pause and recognize that it is not about what is wrong with them, but what was done to them. It is important as a caregiver to understand this distinction. It is fairly easy to acknowledge what happened to a youth. However, even the word “happened” minimizes a youth’s trauma and experience. Understanding what was “done” to a youth affirms that their circumstances were not their fault.
- Remind youth they are worthy, consistently sending the same message every day, even when it is hard to do so. For example, verbally affirm them by acknowledging strengths and successes.
- Learn how the youth communicates, expresses and receives love. For example, is it through words of affirmation, time or acts of kindness?
- Be conscious of the ways you speak to and treat the youth compared to others who may be residing in the home. Foster youth often already feel different; avoid affirming that for them and focus on treating all youth, including biological children, the same.
- Likewise, be mindful of all language used, both verbal and non-verbal. Avoid assumptions, “system” jargon and using labels.

- Have open and transparent conversations with the youth about boundaries and expectations.
- Explain the role and obligations of a caregiver.
- Be flexible and meet the youth where they are both figuratively and literally—understanding that trauma often impacts developmental growth just as much as it does emotional growth. Be mindful that a youth's chronological age may not always align with their actions or behavior.
- Be flexible in meeting youth's needs/wants and teach them skills to get their needs met in a healthy and appropriate way.
- Be confident in the ability to set boundaries. For example, a youth may say, "If you don't give me permission to go to the party with my friends I won't come home from school and you'll never see me again." It is appropriate, as stated in RPPS, to still not grant permission and instead say, "Unfortunately, you cannot attend the party. And if you choose to leave, I would feel really sad, but I'm still going to be here when you return." The key is in consistency.
- Support family and friend engagement where appropriate and possible. Advocate for including these individuals in the youth's life or support team.
- When possible, engage all family members including birth parents, in discussions about the youth's progress, challenges and overall well-being. Maintain open dialogue and respect towards significant people in the youth's life where appropriate.
- Allow for normalcy and employ RPPS. For example, depending on age, it is appropriate to let a youth go to the movies with friends, or walk to a coffee shop after school regardless of their exploitive history and/or status.
- Recognizing that youth often respond well to otherwise difficult conversations when brought up during car rides; use transportation or other similar situations, to build rapport and relationships with the youth.
- Coach the youth on ways in which social media can be used as a positive form of communication and relationship building. Discuss the dangers and repercussions of using social media or other websites for concerning activity. Show them how to do this if possible. Utilize online resources to learn more about social media safety if necessary. Further, work with the youth's social worker and/or probation officer and support team to determine any boundaries or limits surrounding social media use.
- Social media and cell phone use, particularly for youth who have experienced commercial sexual exploitation, can be an area of concern. Cell phones however, can be a harm reduction strategy as they allow for a youth to be reached even while missing from care. Further, most youth identify a phone as a basic need. As a caregiver, work with the youth around safe and healthy phone use utilizing a "meet in the middle" mindset where possible.
- Offer and allow frequent opportunities for choice, empowering youth to participate in their own decision-making experience.
- As a caregiver it might be natural to jump into problem solving when a youth is struggling; however, sometimes what youth truly need is validation and acknowledgment. Allow space for that before trying to "fix" a situation. When needed, ask for help and guidance from the youth's team.



What to Avoid

A harm reduction approach ultimately requires patience, consistency and a recognition that lasting change will take time. Most importantly, caregivers should understand that when a youth is being exploited, a rescue mentality that seeks an immediate and complete break in the abusive relationship has proven ineffective. It is important to recognize that a youth's exploitation is not a choice they made. Assuming youth own this choice will result in a youth's disengagement and distrust. Harm

reduction reminds us that attempting to exert control over young people, particularly CSE youth, serves only to push them away. At the same time, it is not the caregiver's role to convince the youth that they are a victim of sexual exploitation, as youth may not understand the dynamics and psychological coercion that may keep them in an exploitive situation. Below are other things to avoid when working with youth abused through commercial sexual exploitation:

Do Not:

- *Utilize a punitive approach, which includes both punishment within your home for exploitive behavior, as well as instructing a youth that their experiences of harm related to their exploitation are their punishment for their actions.*
- *React impulsively to uncomfortable or challenging situations.*
- *Pass judgment on a youth's choices and/or experiences.*
- *Hold a youth's money without discussion or collaborative planning with the youth. Youth abused through commercial sexual exploitation are accustomed to having power and control stripped away. Holding or taking away a youth's money continues to remove power instead of giving them back some control.*
- *Blame or shame a youth about their choices and/or experiences.*
- *Blame a youth when they leave placement, as they may feel they have no choice but to do so.*
- *Lie or omit information from the youth.*
- *Engage in behavior that is clearly outside of your role or may be viewed as exploitive; instead, maintain healthy boundaries and consistency.*
- *Use basic needs, or services, as an incentive or make them conditional. For example, "I'll*



take you to get your hair done if you complete your homework." This is reminiscent of the exploitive situation and only serves to reinforce exploiter dynamics.

- *Take things personally. This is about the youth, and the reactions they have toward a caregiver are often a reflection of their trauma rather than the person they are directing their actions to.*
- *Shame, judge, or negatively discuss a youth's birth family or support system. Recognize that despite a birth family's actions, they will always be that youth's family and that youth will likely always care for them.*



- *Treat the youth like a victim or an offender, or both. Treat them like the youth they are, the whole youth, not solely the part involved in exploitation.*
- *Place unrealistic expectations on the youth, such as expecting them to schedule and arrange transportation to their appointments, or even communicate their feelings/needs, if they have never been taught to do so before. It is important to remember that many things have been orchestrated or controlled by the exploiter and therefore the youth has not had the opportunity to develop particular skills.*
- *Utilize your own agenda. Instead stay open-minded, flexible and adaptable to the needs of the youth.*
- *Expect the youth to meet your needs.*
- *Doubt the youth or always assume they are lying.*
- *Ignore problematic behavior; instead, hold the youth accountable while responding in a trauma informed way. For example, it is important to understand what drives the youth's actions. This does not mean that certain actions are appropriate. One way to acknowledge problematic behavior is by responding with, "I care about you enough to help you recognize that what you are doing is negatively impacting you or others"*
- *Attempt to change the youth's mind; instead, engage in real, honest conversations aimed at helping the youth come to new, healthier conclusions, understandings and decisions*
- *Discuss the youth with other providers without their awareness or in a way that is judgmental or disparaging. Do not speak about the youth as though they were not present in the room.*

Parents and Relative Caregivers

The above scenario details a youth in an out of home placement. However, ideally youth who have experienced commercial sexual exploitation would be placed with relatives, remain in, or eventually return to their home of origin. Below is a scenario specific to this type of situation:

Rose is a 16-year-old female who has been in the child welfare system for the last 18 months. During this time, she was in several placements including a relative caregiver, two resource family homes and an out of county STRTP setting. Recently, Rose and her younger brother were returned home to their mother and are adjusting to life as a family again. It is suspected Rose is being actively exploited. She has left home and school without permission. On some occasions, Rose does not return home for several days and

refuses to engage with therapists and other service providers. Rose expresses to her mother that she has been taking care of herself for many years and does not need to discuss her whereabouts or activities with her mother or anyone else. Rose's mother continues to intervene and is utilizing both extended family members as well as Rose's treatment team to support Rose in not only this transition, but in understanding exploitation.

While most of the strategies described above are also applicable to relative caregivers and parents, below are specific strategies these caregivers can utilize when caring for CSE youth.

Strategies for relative caregivers and birth parents:

- Seek out parent support groups if available.
- Seek education surrounding the dynamics of child sexual exploitation and its impact. Utilize the child's social worker/probation officer and/or child's CFT.
- Utilize supportive services such as individual therapy, family therapy, wraparound programs, parent advocates and other survivor advocate/mentor organizations. Often youth are more engaged in their own services when they observe their caregivers receiving support.
- Identify ways to share with your support system what the youth is experiencing. Include the youth in this discussion if appropriate.
- Encourage youth to maintain daily contact with supportive adults from previous placements or peer advocates.
- Discuss expectations. For relatives, this may be defining expectations and how they differ from the youth's home of origin. For parents, this may be discussing how they've changed or shifted since removal if applicable. These conversations could be a discussion of expectations around communication, rules, consequences, what is required to make the youth feel at home and how basic needs are met.
- Recognize healing takes time for the youth, the caregiver and potentially the relationship between the two.
- Maintain a similar schedule as the previous placement to allow for consistency in the midst of significant change, if applicable.
- Most importantly, acknowledge that the youth's exploitive experience is not their fault, nor their choice. This message is powerful and restorative when delivered from a loved one such as a family member.


Harm Reduction for Residential Facility Administrators

Congregate care is currently the most commonly used placement type for youth who have experienced commercial sexual exploitation in California. This occurs for several reasons, including but not limited to: insufficient numbers of willing, able and appropriately trained resource parents, misinformation or negative beliefs of youth who have experienced exploitation, and a lack of placements for adolescents overall. In recent years, there has been an effort to shift all youth to a lower level of care, focusing on

home-based care and more family like settings. For some youth, congregate care provides the type of structured environments practitioners assume youth who have experienced exploitation need in order to establish stability and be successful. While structure can be beneficial to all youth, how that structure is provided is critical. Below are strategies for congregate care administrators, whether in a group home, STRTP, Temporary Shelter Care Facility or Youth Homeless Prevention Center, to consider in the structure of their programs.



STRTP Staffing and Training:

- *It is the administrator's responsibility to ensure all staff are adequately trained and prepared to serve this population. It is imperative all staff, from leadership to line staff, receive ongoing training specific to commercial sexual exploitation of youth that is strategies based, trauma-informed and harm reduction focused.*
 - *Ensure staff are aware of appropriate language to use when engaging with youth who have experienced commercial sexual exploitation, being mindful to avoid labels and terms that perpetuate misperceptions, glorify exploitation, blame the youth for what was done to them, or demonize the people in their life including the exploiter. For example, do not ask a youth, "is that your pimp?" Instead ask, "Is that your boyfriend/girlfriend? Tell me about him/her." Try to avoid using the word "why" when asking questions of the youth, this language blames the youth for their experiences of exploitation. Additionally, asking the youth why they can't just stay in placement, or calling them a "CSEC" youth are both inappropriate and harmful.*
 - *Create built in supports for staff to reduce burn out, and/or be proactive when evidence of vicarious trauma presents itself, beyond standard Employee Assistance Program services.*
 - *Create specific screening strategies when hiring staff that exhibit empathy, open mindedness, and an awareness of what change truly looks like for young people.*
 - *Youth's actions and reactions are often not about the person they are directed towards, but instead a result of past trauma and dysregulation. Ensure staff know this and do not take the youth's behavior personal which can be both inappropriate and unproductive.*
 - *Coach staff on appropriate verbal and non-verbal responses when engaging with youth who have experienced commercial sexual exploitation. Youth are highly perceptive; if a staff's body language conveys disgust or frustration it can be incredibly damaging.*
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- *Ensure staff understand the concept of attachment theory and how it impacts youth who have experienced trauma. Specifically, how the use of harm reduction strategies may leave staff feeling they are enabling a youth's behavior in a negative way. Coach staff to understand how a more authoritarian parenting style is not effective for youth who have little to no experience with healthy attachment or bonding with adult caregivers, particularly when setting rules and structure. For those youth, authoritarian responses are viewed as a severance of love. To them, love is consistency, follow through, or being welcomed back after a long time away.*
 - *It is common for youth who have experienced commercial sexual exploitation to have an increase in triggers and crisis overnight. As a result, the facility should increase the staff-to-youth ratio during the night shift to ensure adequately trained support is available to both staff members and youth.*
 - *Providing 24/7 care to youth can often come with many challenges. However, it is vital for staff to ensure they are not displacing some of their frustration back on the youth themselves. Words can have a heavy impact and it is important to be mindful of how they are used when speaking of or to the youth. Below are examples of statements that could be particularly harmful to a youth, even if the intent is well intended.*



Providing 24/7 care to youth can often come with many challenges. However, it is vital for staff to ensure they are not displacing some of their frustration back on the youth themselves. Below are examples of wording staff should never use when speaking with youth in care.

Never say:

- *If you leave, we'll close your bed."*
- *"You're a victim."*
- *"You don't have to be here."*
- *"I don't have to be doing this for you."*
- *"You have to stay."*
- *"You'll get arrested/caught up in something if you leave."*
- *"There's nowhere else to go."*
- *"We can't help you if you choose to be in the life."*
- *"Your boyfriend doesn't love you."*
- *"Why do you keep doing this to yourself?"*
- *"You should be grateful to have this placement."*
- *"You're my favorite girl/boy."*
- *"What are you wearing? You look like..."*



Remind youth they are worthy, consistently sending the same message every day, even when it is hard to do so.

Programming and Services for Youth:

- For facilities with Non-Public Schools on site, consider changing the start time for class and/or programming. Youth who have experienced commercial sexual exploitation may be accustomed to being up all night and sleeping during the day. Find ways to set them up for success by making adjustments where possible.
- For Tribal youth, connect with the youth's social worker regarding potential culturally competent services and resources.
- Avoid behaviorally based incentives, reward systems, or level system programming. These only serve to replicate the same dynamics a youth has experienced with exploiters and purchasers. Connecting an action or behavior to a monetary figure is reminiscent of the exploitive situation and can lead to triggering the youth.
- Avoid level systems that categorically punish youth for leaving care. Youth may leave for reasons beyond their control – such as the at the threat of an exploiter – and they should not be additionally punished for that behavior.
- Be proactive in addressing the concept of “AWOL” at the moment a youth is placed in a new home or facility, instead of when a youth has already left placement. Be transparent when describing what consequences there may be and create a prevention plan together with the youth. Identify with the youth moments when they may be more likely to leave, things staff can do to support, and most importantly, develop a safety plan to enact when they do leave. The safety plan should contain information on how they can stay safer even while missing from care. For more information and helpful tips please reference [ACIN I-14-19](#)⁷.
- Avoid the use of “black-out periods” wherein youth are prevented from accessing certain privileges for a certain amount of time when they enter a new placement (such as visits or cell phone use). Black-out periods mimic the same kind of control an exploiter exerts by placing restrictions on what a youth can, or cannot do, as well as disconnecting them from a self-identified need or relationship.

While black-out periods may appear helpful in allowing a youth to acclimate to a new environment without distraction, they can also serve to push youth away, hindering their healing and/or safety by disconnecting them from people and activities that are important to them.

- Consider allowing cell phones. While providers are often concerned that cell phones increase danger, including access to exploiters and purchasers, cell phones can be an excellent harm reduction strategy, offering the youth an ability to directly connect to a support person while they are missing from placement or in crisis. Additionally, their ability to help youth maintain relationships with family and peers. It helps to give youth a sense of normalcy since it is likely that most, if not all, their peers have cell phones. Setting parameters for cell phone use is appropriate, as long as they are realistic. The youth should be involved in the setting of these realistic parameters and can often be empowered through the process of creating their own “cell phone contract,” including the rules and consequences.
- Create opportunities to celebrate every success, no matter how small. Involve peers and family, if desired and appropriate, in the celebrations.
- Provide opportunities for independence through the use of community passes. Create a plan for these passes with the youth's CFT.



Engagement:

- *Meet all basic needs as the youth defines them. Engage in transparent conversation with the youth about their needs, learning about what they see as necessary to their well-being, no matter how trivial it may seem to professionals. At times it may be difficult to meet all needs due to limited resources, but this should not stop a provider from trying to fulfill the request. Utilize the youth's CFT and engage local community organizations for support. Ensure all staff, from leadership to line staff, support and believe in the importance of meeting all youth needs however possible.*
 - *Move away from use of terms "placement" or "STRTP," and instead focus on what the facility is to the youth currently – their home. This shift may help engage with youth differently, with a mindset that is geared toward normalcy.*
 - *Allow the youth to lead in as many ways as possible, including the development of their Needs and Services Plan and identifying personal consequences. Youth who experience commercial sexual exploitation often have limited control or agency over their lives. Helping them regain some of that power will support their healing process.*
 - *Normalize a youth's desire for independence. Reduce barriers to a youth taking space, going on a walk, going to a local coffee shop, or seeking alone time. This is a normal piece of adolescent development and creating room for activities like this may deter the youth from leaving care.*
 - *Connect with the county and your Licensing Program Analyst with Community Care*
- Licensing, if you encounter a potential conflict between a youth's needs and residential rules, regulations, or resource limitations. This opportunity may arise when in need of an exception, services, resources or general support. Providers are a part of a child's team; utilizing the remainder of that team will help the youth be more successful.*
- *Create a safety net for youth, not just a home. Providers should create an environment that allows for mistakes and learning from those mistakes, before the youth reaches adulthood and is living on their own. The focus should be geared more toward natural consequences as opposed to punitive, program created consequences.*
 - *Make every effort to connect a youth to their specific interests, however the youth defines and presents them, as well as to healthy relationships with peers or adults who share those common interests. More importantly, if a youth does not know what their interests are, create opportunities for them to discover more about who they are outside of the life of commercial sexual exploitation.*
 - *For Tribal youth, it is especially important to support them in getting connected to culturally based programs. Specifically, language classes can be significant for cultural connectedness. Many of these supports are also accessible virtually. Work with the youth's team to identify the appropriate connections.*
 - *Assist the youth in developing life skills through modeling and/or doing an activity together to support learning.*



Conclusion

The short-term incremental achievements gained through the use of harm reduction strategies are the building blocks a youth needs to build a life free from exploitation. Utilizing a harm reduction approach allows for authentic engagement that builds trust and models positive relationships while empowering the youth; all of which are instrumental in effecting positive change and lasting outcomes. A caregiver has a unique opportunity to be this instrument and dispel the messages an exploitive situation tells youth about themselves, ultimately providing an opportunity for a brighter future. It is important to remember that serving youth who have experienced commercial sexual exploitation is challenging and often heartbreaking. It will take time and there will be setbacks. Harm reduction is most successful when used consistently. Not every strategy will

be successful every time, but it is vital to not give up. Providing care for a young person who has experienced significant trauma is no easy task. It is imperative all caregivers be mindful of signs of burnout and fatigue. Burnout can lead to hopelessness or attempts to control the youth – both of which can be harmful for all parties involved. Moreover, at times no matter how much effort is exerted, no matter how much time is expended, a youth still may struggle. Healing takes time and the seeds caregivers' plant may take a long while to grow, but regardless, caregivers do make a difference. It is critical caregivers find ways to seek support and respite when needed. If possible, join a caregiver support/education group, seek out parent/peer mentorship opportunities and utilize your licensing agency, and the youth's team for any and all resources.



Contact Information

For further information relative to youth who have experienced commercial sexual exploitation, the California Department of Social Services has made available a free, 90 minute online learning module at the California Social Worker Education Center's ["Commercially Sexually Exploited Children Awareness Training Module"](#) link. For information on local caregiver support groups and training opportunities, please reach out to your county's child welfare CSEC Coordinator. A list of each county CSEC Coordinator can be found attached to ACIN X-X-XX.

Resources

- 1 [All County Letter No. 07-49](#)
- 2 [All County Letter No. 17-71](#)
- 3 [The Indian Child Welfare Act for Kin Caregivers & Foster Parents](#)
- 4 [Welfare and Institution Code \(WIC\) 362.05](#)
- 5 [All County Information Notice \(ACIN\) I-14-19](#)
- 6 Kate Walker, California Child Welfare Council, Ending The Commercial Sexual Exploitation of Children: A Call for Multi-System Collaboration In California (2013)
- 7 [All County Information Notice I-14-19](#)





California Department of Social Services
Family Centered Safety and Support Bureau
744 P Street | MS 8-11-87
Sacramento, CA 95814

<http://www.cdss.ca.gov/inforesources/Child-Welfare-Protection/Child-Trafficking-Response>



KIM JOHNSON
DIRECTOR

STATE OF CALIFORNIA—HEALTH AND HUMAN SERVICES AGENCY
DEPARTMENT OF SOCIAL SERVICES
744 P Street • Sacramento, CA 95814 • www.cdss.ca.gov



GAVIN NEWSOM
GOVERNOR

APRIL 8, 2022

ALL COUNTY INFORMATION NOTICE (ACIN) NO. I-31-22

TO: ALL COUNTY CHILD WELFARE DIRECTORS
ALL COUNTY PROBATION OFFICERS
ALL COUNTY BOARDS OF SUPERVISORS
ALL TITLE IV-E AGREEMENT TRIBES
ALL CHILD WELFARE SERVICES PROGRAM MANAGERS
ALL COMMUNITY CARE PROVIDERS

SUBJECT: HARM REDUCTION SERIES - CAREGIVER

REFERENCES: [SENATE BILL \(SB\) 855 \(STATUTES OF 2014, CHAPTER 29\); WELFARE AND INSTITUTIONS CODE SECTION 16524.6 – 16524.11; SB 1322 \(STATUTES OF 2016, CHAPTER 654\); ALL COUNTY INFORMATION NOTICE \(ACIN\) NO. I-79-17, DATED DECEMBER 4, 2017; ALL COUNTY INFORMATION NOTICE \(ACIN\) NO. I-59-18, DATED September 14, 2018](#)

The purpose of this All County Information Notice (ACIN) is to inform county child welfare departments and all community care providers of the attached California Department of Social Services Harm Reduction Series - Caregiver guidance. The California Department of Social Services (CDSS), in collaboration with a multidisciplinary team of subject matter experts, has identified the harm reduction approach as a promising practice for serving children and youth abused through commercial sexual exploitation (CSE).

Background

Over the past several years there has been a dramatic shift in understanding the CSE of children and youth in California. This growing awareness resulted in the identified need for specialized services to address their unique needs and complex trauma.

With the passage of [Senate Bill 1322](#), California acknowledged children and youth who experience CSE are victims who, therefore, should not be criminalized. This change in statute instead specified that exploited children may be adjudged dependents of the juvenile court pursuant to [Welfare and Institution Code \(WIC\) 300 \(b\)\(2\)](#), and may be taken into temporary custody pursuant to subdivision (a) of Section 305 of the WIC. California relies on the expertise of child welfare social workers, with the support of a multidisciplinary team

of practitioners, to appropriately serve children and youth who have experienced exploitation. Although there are evidence-based practices that have shown to be successful in intervening with victims of CSE, such as trauma-focused cognitive behavioral therapy, there are no specific practices that have been identified solely for serving children and youth who have experienced CSE. Therefore, the CDSS has identified the harm reduction approach as a promising practice for engaging commercially sexually exploited children and youth.

Harm Reduction Series – Caregiver

As stated in [ACIN I-59-18: An Introduction to the Harm Reduction Series](#), the harm reduction approach acknowledges that change is difficult and that it may take a period of time before the child or youth is willing or able to leave an exploitive situation. Thus, the goal of the harm reduction approach is to reduce the youth's reliance on an exploitive situation by promoting long-term safety through the achievement and recognition of short-term incremental gains. Harm reduction recognizes that change for this population is both an internal and external process.

Caregivers occupy a challenging but significant role in the lives of all youth. The attached guidance explores ways in which caregivers, whether a resource parent, parent or guardian, or residential staff, can utilize harm reduction as a framework from which they derive specific strategies for caring for children and youth who are experiencing, or have experienced, commercial sexual exploitation. This guidance is a set of recommended practices and not intended to replace existing policies and regulations related to caring for dependent children and youth. (See Attachment A – Harm Reduction Series- Caregiver) It is strongly recommended to read [ACIN I-59-18: An Introduction to the Harm Reduction Series](#) prior to reviewing the attached guidance.

CSEC Trainings

For additional CSEC related information and training opportunities, the CDSS has made available the following statewide training resources: The California Social Worker Education Center's 90-minute online training module at [Commercially Sexually Exploited Children Awareness Training Module](#) and WestCoast Children's Clinic Advanced CSEC Caregiver training modules. For more information on the Advanced CSEC Caregiver training dates please email csectraining@westcoastcc.org.

Contact Information

Additional inquiries and information related to the Harm Reduction Series and California's CSEC Program can be directed to the Child Trafficking Response Teams within the Family Centered Safety and Support Bureau, at (916) 651-6160 or CSECProgram@dss.ca.gov.

Sincerely,

CHERYL TREADWELL, Chief
Safety, Prevention and Early Intervention Branch

Attachment