THE ANNOTATED PROTOCOLS GUIDE

Project Roadmap created annotated protocols in response to regular requests for resources and support. ECM Coordinators/Directors, who often take a leadership role in creating written protocols, along with other subject matter experts, also helped to inform this guide.

This series of annotated protocols offers practical guidance, sparks meaningful discussion, and serves as a reference for both the content and scope of effective protocols. Each numbered heading outlines key elements to consider, explains their significance, and provides sample language to help task forces tailor protocols to their unique needs.

Why Protocols Matter

In the early stages of a multidisciplinary task force's development, it is common for members to question the need for formal or extensive protocols especially as they are still evolving. Although protocol development may seem unnecessary at first, it is critical for consistency, longevity, and sustainability.

Protocols help task forces:

- Build transparency and trust among members
- Avoid tension and misunderstandings
- Provide a clear process for addressing any conflict
- Establish clear accountability
- Ensure fair and consistent decision-making

Whether your ECM task force is just beginning or refining long-standing practices, this guide can help facilitate thoughtful conversations and intentional planning around protocol development.

Annotated Protocols

- **Information Sharing**
- Membership
- Data Collection
- Decision Making

Additional Protocol Development Resources

Enhanced Collaborative Model (ECM) Anti-Human Trafficking Task Force Protocol Development Checklists

Human Trafficking Task Force Protocol Development Training Video Series

Multidisciplinary Collaborative Model for Anti-Human Trafficking Task Forces: Development and Operations Roadmap

Task Force Information Sharing Protocol (Annotated Example)

Below is an annotated example protocol for information sharing within a multidisciplinary human trafficking task force. Each provision begins with an explanation as to why that information is relevant/important and is followed by sample language. This is a tool, that when combined with other resources and discussion, will help task forces develop protocols that suit the needs of their circumstances.

1. Purpose and Scope

Notes or clarifies that the protocol applies to more than just information about cases. Reinforces that information sharing is structured and principled, not informal or ad hoc.

> **Sample Language:** This protocol outlines the expectations, boundaries, and procedures for information sharing among members of the [Task Force Name] in support of coordinated investigations, victim services, outreach, and training efforts.

2. Protocol Created By

Names who designed the protocol to signal legitimacy and build buy-in. Shows cross-disciplinary input, which encourages adoption and helps prevent bias toward one sector's norms (e.g., law enforcement vs. victim services).

> **Sample Language:** This protocol was developed collaboratively by the task force, with input from task force members.

3. Guiding Principles

Guiding principles *reinforce the importance of consent as a shared value* and keep everyone grounded. When repeated regularly, they become part of the task force culture.

> **Sample Language:** We share only what we are allowed to, only what is needed, and only with permission from the person it is about. All meetings will begin with a reminder of this principle.

4. Who This Protocol Applies To

Prevents confusion about whether some members are "exempt" or excluded. Helps ensure that everyone at the table is accountable.

> **Sample Language:** Notwithstanding any member agency protocols that contradict the mandates herein, with respect to task force information, all active members of the task force, including any individual or agency participating in task force activities, including but not limited to coordinated response, planning, outreach, or service delivery, are expected to follow this protocol as a minimum standard for information sharing.

5. Legal Framework

Provides a foundation for accountability and professional safety. A clear legal reference helps members justify when they cannot share information, reducing tension.

> **Sample Language:** Information sharing must comply with federal and state laws, including VOCA, HIPAA, VAWA, FERPA, 42 CFR Part 2, and local statutes. Informed consent is a legal requirement under multiple federal laws (e.g., VOCA, HIPAA, VAWA). This protocol recognizes that legal and ethical obligations to protect survivor confidentiality outweigh informal task force requests. When unsure, members must consult agency counsel.

Law	What It Protects	Task Force Considerations
VOCA	Victim identity and service details	Written, time-limited consent required to share any client information, even with law enforcement.
HIPAA	Health and mental health information	Medical information cannot be shared without authorization or exception. Applies to health providers.
VAWA	Victim identity and service access	Survivor information cannot be shared, even confirmation of services, without specific written consent.
FERPA	Student education records	Schools may only share student information under certain exceptions or with written consent.
42 CFR Part 2	Substance use treatment records	Extremely strict—identifying information cannot be disclosed without written consent, even to law enforcement.
State and Local Laws	Varies by jurisdiction	Always consult local law for protections around juvenile, immigration, or criminal justice information.

6. Access to Information

Describes who has access to different types of information. Limits "information creep" and ensures sensitive information is only shared on a "need-to-know" basis. Maintains boundaries between roles. See Appendix B for examples of a tailored approach to information access.

> **Sample Language:** Access to information adheres to the principles of informed consent and "need-to-know" and is based upon a member's role and involvement in task force activities. The Task Force seeks to be as transparent as possible with information, within the confines of informed consent and "need- to-know."

7. Informed Consent is Required for Victim-Level Information

Memorializes best practices and the principle that survivors have the right to control how their information is shared. Clarifies that different disciplines have different legal obligations and encourages mutual respect for such limitations.

> **Sample Language:** No personally identifying or trauma-related information about any victim/survivor may be shared across agencies without that person's informed, time-limited, and voluntary consent—unless legally mandated or required for immediate safety concerns.

Best Practices for Informed Consent Include:

- **Informed**: The person understands what information will be shared, with whom, why, and for how long
- **Voluntary**: Services or safety cannot be conditioned on saying yes
- **Time-Limited**: The consent expires after a defined time or event
- **Documented**: Ideally written; verbal allowed only in emergencies with follow-up written documentation

8. Release of Information (ROI)

Defines ethical consent practices. Sets a higher bar than consent that is implied and helps protect survivor autonomy. Ensures the ROI process is standardized and victim-centered. Also supports providers who might feel pressured to "just share it" in the name of collaboration.

> **Sample Language:** All partners are required to use their agency's formal ROI process when requesting victim-specific information. Providers must offer a clear explanation of the purpose, scope, and duration of the information-sharing request. Survivors must be told they have the right to decline without penalty. Verbal ROIs may be used in emergencies but must be documented.

9. Method(s) of Sharing

Establishes safe, consistent practices. Opportunity to describe methods of sharing for different types of information, documenting more secure methods for more sensitive information.

> **Sample Language:** Case-specific information should only be shared using secure channels (e.g., encrypted email, secure folders). Verbal updates can occur in designated meetings with regular confidentiality reminders.

10. Debrief Process

Promotes continuous learning and creates a safe place to improve practice.

> **Sample Language:** After case coordination or major events, members may debrief to evaluate the effectiveness of information sharing, note concerns, and identify follow-ups.

11. Violations of Consent and Confidentiality

Adds accountability and sets a respectful tone for correcting oversteps, especially from powerful actors.

> **Sample Language:** Violations of consent and confidentiality will be addressed seriously and may result in formal action by the leadership team. Partners who pressure others to disclose survivor information without consent will be coached on legal and ethical boundaries.

12. Noncompliance and Grievance Process

Sets a clear path for accountability while leaving space for learning and restorative practices.

> **Sample Language:** If this protocol is not followed, the issue will be addressed pursuant to the task forces grievance policy. Repeated or serious breaches may be brought to the task force leadership team for review and resolution, using trauma-informed conflict resolution processes.

13. Ownership, Review, and Revision

Builds sustainability and responsiveness.

> **Sample Language:** The protocol will be reviewed annually and agreed-upon updates will be made by the Coordinator/Director. Updates will be made in response to new laws, challenges, or partner input.

APPENDIX A: Types of Information a Task Force Might Handle

Below is a non-exhaustive list of both the categories of information a task force has/handles, with some examples for each category. This list can help inform protocol development, data sharing agreements, confidentiality practices, and role clarity.

Case-Specific Information

- Victim or survivor identifying information
- Suspect information and criminal history
- Case narratives, reports, and timelines

Service Delivery Information

- Referrals to/from other services
- Safety planning details
- Shelter and housing placements

Programmatic and Administrative Information

- Memorandum of Understanding (MOUs)
- Partner roles and contact info
- Grant reports / performance measures
- Funding allocations or budget summaries

Data and Trend Analysis

- De-identified case data and aggregate trends
- Referral sources and patterns
- Law enforcement tips

Awareness and Outreach Information

- Social media content and analytics
- Outreach materials
- Audience data and feedback
- Survey results from the community

Confidential or Sensitive Interdisciplinary Information

- Internal conflicts or ethical concerns
- Debriefings after operations or critical incidents

APPENDIX B: Sample Visual Matrix of Information Access and Use

Below is a sample visual matrix ECM task forces can use and/or adapt as a reference tool when developing protocols or training team members. It outlines who needs access, who may share, and the permissible uses for different types of information managed by a human trafficking task force.

Type of Information	Needs Access	Who May Share	Permissible Uses
Victim/ Case Information	Law enforcement, service providers, prosecutors (case-specific)	Agency that was given the information by the victim, with the victim's consent or authority	Investigations, safety planning, prosecution
Service Delivery Information	Service providers, some law enforcement (case-by-case)	Service provider with client consent or under mandated duty	Direct services, coordinated care, safety support
Program/ Administration Information	Task force Coordinator/Director, leadership team, grant staff	Coordinator/Director or designee (internal reporting or grant compliance)	Reporting, planning, tracking accountability
Awareness and Outreach	Outreach team, Coordinator/Director, public information staff	Public-facing staff or leadership, with pre-approved content	Community engagement, awareness, education
Data and Trend Analysis	Data analyst, Coordinator/Director, leadership team	Coordinator/Director or analyst (de-identified only)	Gap analysis, funding justification, strategic planning
Sensitive/ Team Dynamics	Leadership team, Coordinator/Director, possibly funder (internal only)	Leadership team (internal discussion only)	Team strengthening, debriefing, resolving tensions

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