

A large, abstract white line art graphic on a blue background, resembling a stylized sailboat or a large arrow pointing downwards and to the right. It consists of several overlapping, curved lines that form a shape similar to a sail or a large, open letter 'A'.

# A Holistic Approach to Human Trafficking and Exploitation: A Framework for Action

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## Introduction

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The City of Minneapolis envisions being a “compassionate city where each of us can reach our full potential while caring for one another, eliminating racial disparities, improving our environment, and promoting social well-being. We lead in innovative and creative ways, focused not only on our present needs but also the success of future generations.”

Every four years, the City adopts goals and priorities to actualize its vision and achieve its goals of ensuring safety; eliminating racial disparities in housing; advancing economic inclusion of workers and businesses, especially for people of color, and Indigenous communities, and ensuring that immigrant businesses feel supported and can thrive. Minneapolis 2040 and the Strategic and Racial Equity Plan (SREAP) are tools that incorporate the City’s values, including racial equity, in all its initiatives. Specifically, SREAP provides a framework to advance the City’s work in a manner that helps ensure that City services and investments are benefitting the most marginalized and vulnerable communities in the City. SREAP focuses on creating equitable housing, public safety and economic development policies by procuring services and using existing data to inform its decisions which help advance the City’s racial equity work.

The anti-trafficking and sexual exploitation work fits within the greater vision of a city where affordable housing is accessible, a livable wage is realized, neighborhoods are free of violence and exploitation, and systemic barriers are eliminated for all citizens, but particularly for those who are at a higher risk of being trafficked and exploited.

Human trafficking is a by-product of so many underlying issues, systematic barriers in the form of economic and social inequalities, and oppression of all kinds. Existing laws and policies at the federal, state and local levels, have created unfavorable social and economic conditions for those who have been historically marginalized. Many continue to face marginalization by implementation of these policies and programs and services that were not fully informed by the communities. As a result, BIPOC communities (Black, Indigenous, People of Color) continue to experience high rates of poverty, unemployment, homelessness, chemical dependency, mental health issues, violent crime, exploitation, prostitution, sexual violence, and human trafficking.

Although Minnesota enacted its human trafficking law in 2005, it was not until 2011, during the movement to pass the Safe Harbor for Youth Act, that the state acknowledged the problem as a public health issue and one that could be prevented by employing holistic and comprehensive measures and practices. Since then, Minneapolis has mobilized City departments to develop policies designed to bring about change in institutional behavior, and to invest in community organizations that provide services and outreach to victims/survivors. Despite the good work, this response is not nearly enough.

The 2013 Minneapolis City Council Resolution, authored by former council member Elizabeth Glidden, helped formalize the City’s anti-sex trafficking and sexual exploitation of juveniles by directing the City to form a Coordinating Committee. The committee’s goals were to coordinate and support the activities

of various City departments and to coordinate City efforts with other government, non-profit organizations, and community partners. The Coordinating Committee would later be known as the Juvenile Sexual Exploitation workgroup and was chaired by former City Attorney Susan Segal.

### **Local Efforts to Address Human Trafficking**

Since 2013, the City has passed and implemented policies and practices to operationalize and implement the Safe Harbor for Youth Act, a Minnesota law that decriminalizes youth under 18 who engage in the selling of sex and/or survival sex and directs them to receive services. It includes:

- Sex Trafficking and Sexual Exploitation:
  - In 2013, the City Council adopted a city pledge to combat commercial sexual exploitation and trafficking of juveniles and established a cross-disciplinary Coordinating Committee to Prevent Juvenile Sex Trafficking;
  - In 2013, the City passed its first massage regulation ordinance to combat sex trafficking;
  - In 2013, the Minneapolis Youth Congress and the Youth Coordinating Board prioritized the human trafficking crisis, conducted a study, and engaged decision-makers to develop policies and regulations that reflect the City's commitment to end human trafficking;
  - The Minneapolis Police Department formed a dedicated juvenile sex trafficking investigation unit, comprised of two skilled investigators and an analyst, which uses a victim-centered approach. The unit also works closely with non-profit advocacy agencies and county child protection departments and prosecutors to recover victims and to develop criminal cases against traffickers; the MPD has also assigned an officer to the Minnesota Bureau of Criminal Apprehension Human Trafficking Task Force;
  - City staff, including school-based clinic nurses, firefighters, and housing inspectors, has received training how to identify signs of potential sex trafficking and how to appropriately respond in these situations;
  - Juvenile sex trafficking information and training has been provided to licensed City businesses, including hotel staff;
  - The City partnered with the Women's Foundation of Minnesota, non-profit organizations, and Hennepin and Ramsey County prosecutors to develop a plan to bring awareness of and to prevent juvenile sex trafficking using the 2018 Super Bowl held in Minneapolis as a platform. Funds to support the \$1 million-dollar campaign were privately raised and included funding from the National Football League. The comprehensive plan focused on 1) training; 2) education and awareness through two campaigns developed by survivors of juvenile sex trafficking, ("Don't Buy It") to educate men and boys, and ("I am Priceless"), to prevent youth from becoming trafficking victims; and 3) service delivery in partnership with the Minneapolis Police Department;
  - City Attorney Segal participated in the State Human Trafficking Task Force Legislative and Policy Committee. The City's Intergovernmental Relations Office vetted legislative proposals and provided support for provisions consistent with the City's legislative

agenda. In 2017, the City assisted in the passage of legislation that helped to fund and support research to explore the partial decriminalization of prostitution and to provide a strategic plan to the legislature, the funding for which was funneled through the Minnesota Department of Health. The Safe Harbor for All report was published in 2019, which also provided guidance in drafting policies and in implementing recommendations proposed in this Blueprint;

- In 2018, the City passed an honorary resolution declaring February 15, 2018, as “Standing up Against Commercial Sexual Exploitation Day;”
- In 2018, The Link, a nonprofit that provides services to homeless/runaway and sexually exploited and trafficked youth, received \$25,000, from the City, for two years to support their Passageways Emergency Shelter and Housing Program;
- Developed a pre-charge treatment-based diversion program for prostituted adults in partnership with The Family Partnership, Minnesota Indian Women’s Resource Center, and other culturally specific, trauma-informed providers; this program is currently on hold and other best practices are being explored by the City Attorney’s Office;
- Implemented the juvenile supervision center staffed by The Link, our Regional Navigator for the State’s Safe Harbor No Wrong Door initiative, where youth can be dropped off by officers for truancy or curfew-related issues;
- The City co-funded homelessness initiatives in conjunction with Hennepin County and provided funding for street outreach workers from YouthLink, a service provider for homeless youth up to age 24;
- Minneapolis Health Department ensured, and continues to ensure, compliance with the new state rules requiring training on sex trafficking for the lodging industry;
- Minneapolis Health Department contracted with The Family Partnership and the Minnesota Indian Women’s Resource Center (MIWRC) to conduct outreach to sexually exploited individuals on Lake Street between 2017-2019;
- Minneapolis also benefits from the state’s Safe Harbor programs and services through nonprofits – The Link, The Family Partnership, YMCA of the North, Outfront Minnesota, Minnesota Indian Women’s Resource Center, Lutheran Social Services Streetworks Collaborative, and Mid-Minnesota Legal Aid, and the City’s departments interact with these organizations in implementing the state’s Safe Harbor system;
- In 2018, the City applied for the Pathways to Freedom Grant, after recognizing the need for a dedicated position to drive the work forward and the need to address exploitation and human trafficking;
- In 2019, the City passed a resolution directing the City to expand its focus to include sex and labor trafficking and exploitation for all;
- In 2019, the City Attorney’s Office in collaboration with Center on Women, Gender, and Public Policy and Center for Urban and Regional Affairs at University of Minnesota, Twin Cities sponsored graduate researchers to create an educational tool that will help to make expungement accessible for victims/survivors of sexual exploitation (prostitution).<sup>1</sup>

Since July of 2018, the Pathways to Freedom Grant, with a dedicated staff position, in the form of Senior Advisor, advanced the City's commitment through internal and external coordination and collaboration. Three examples presented below are a testament to it.

#### Pathways to Freedom in Action, Example #1

In the summer of 2019, Council Member Alondra Cano instructed the City's Health Department to provide an evaluation of the \$50,000 contract with The Family Partnership and the Minnesota Indian Women's Resource Center (MIWRC). These agencies were awarded money to conduct outreach to victims of commercial sexual exploitation on the Lake Street corridor, and to ask for recommendations to mitigate the harm experienced by those who frequent Lake Street. Health Department staff and the Senior Advisor conducted interviews with staff and leadership from these agencies, business leaders in Ward 9, victims/survivors, service providers, and law enforcement from the MPD's Third Precinct. City Attorney Segal provided high-level supervision and guidance on the project. Below are a few major highlights that were submitted to CM Cano:

- Arresting prostituted people had not proven effective and needed to be avoided;
- A compassion-centered, trauma-informed approach for victims of sex trafficking/commercially exploited individuals was necessary;
- The commercial sex market is a component of drug addiction, homelessness, and trauma and must be addressed holistically;
- The commercial sex market must be disrupted in the short-term while longer term solutions are sought out;
- A long-term, wrap-around approach that includes multiple agencies (akin to the Navigation Center for Hiawatha Encampment) will be necessary to make a profound impact;
- Extending the Navigation Center's holistic approach to the problems on Lake St. will yield positive results;
- Convene a team representing multiple jurisdictions, City departments, community agencies/stakeholders/residents/businesses, county government, and experts to discuss issues involving the Lake Street corridor including commercial sexual exploitation, drug use, and public safety. It is highly recommended that this team be led by policy and decision makers.

Additionally, the Senior Advisor attended community meetings in Ward 9 on crime, safety, public health, and other livability issues. Street prostitution, commercial sexual exploitation, and sex trafficking were raised in broader conversations. However, community members acknowledged these issues necessitated a more comprehensive approach to fully address issues affecting vulnerable populations in certain communities.

## Pathways to Freedom in Action, Example #2

In the Spring of 2019, during a housing discrimination investigation involving a group of Somali mothers in the Cedar Riverside community, a Civil Rights Department staff member was approached by a group of mothers who shared their concerns of ongoing sex trafficking and exploitation of young girls in their neighborhood. Mothers reported that sexual exploitation and trafficking had been an issue since 2017 but had escalated that summer and had caused great harm to the community.

The Senior Advisor was brought in as the in-house expert to appropriately respond to the situation. The Senior Advisor met with Bosteya Jama, Executive Director of the Cedar Riverside Neighborhood Association (CRNRP), and a few mothers to learn more about the situation, to listen to their concerns in detail, and to ask how they hoped the situation would be resolved.

In June 2019, Civil Rights staff and the Senior Advisor conducted one-on-one interviews centered on sex trafficking and exploitation with eight Somali mothers. All mothers interviewed confirmed concerns that young girls were being trafficked for sex in and out of the Cedar Riverside neighborhood. Mothers feared many of the girls were minors, and reported girls involved were as young as 12. One mother described how a neighbor's daughter went missing for four nights before being returned home. Another told City staff that along with Somali girls, Ethiopian, Sudanese, Indigenous, Black, and some LatinX girls were being brought into the neighborhood to be sold for sex. During these interviews, mothers also reported that security staff in their apartment buildings exploited girls for sex and sold drugs to young boys. After the one-on-one interviews, the Civil Rights Department Director was briefed on the situation and contacted the Minneapolis Police Department.

CRNRP staff, the Senior Advisor, and Civil Rights staff met regularly to determine how to respond to the mothers' concerns beyond the initial contact with law enforcement. In a series of meetings, the mothers talked about the lack of resources and not having engagement activities for young people, especially for young girls, thereby forcing them to engage in "risky behavior." The mothers asked for engagement tools and a support program for young girls.

After learning about a culturally-specific program for young Somali girls called Young Women's Wellness and Leadership Initiative (YWWLI) from staff at the Neighborhood and Community Relations (NCR) Department, the Senior Advisor reached out to Amira Adawe, the executive director of The Beautywell Project, to explore the suitability and viability of instituting YWWLI in the Cedar Riverside Neighborhood. The YWWLI curriculum focuses on health and sexuality, relationships, public policy, and helps Somali Girls develop leadership skills in a culturally sensitive way. The goal of the group was to help young Somali girls and women take charge of their health and well-being, develop necessary leadership skills, and be empowered to make informed decisions on all matters. After factoring in the neighborhood situation and receiving critical information and feedback from the mothers, Adawe adjusted the curriculum. With the help of the City Attorney's Office, the Office of Violence Prevention, and the NCR from their allocated neighborhood funding, the Senior Advisor raised the money to launch the program. A group of nine girls, ages 14-18, met for six months and graduated in the Spring of 2020. This would not have happened without the coordination, collaboration, and support from

City staff and leadership, but, most importantly, it would not have happened without the active participation and feedback from the leaders and mothers within the community itself.

Some family members in the community continued to struggle with issues resulting from their child's victimization. The Senior Advisor continued to bring in experts and make connections to help families navigate the complex systems and find help and resources for their child and support for their families. Those involved included Michele Rivero from Office of Immigrant and Refugee Affairs, Stacy Schutz, the Safe Harbor West Metro Regional Navigator at The Link, Stand Point staff, Officer Brandon Brugger, the MPD's representative to BCA, Commander Giovanni Veliz from the Special Crimes Unit, and Hennepin County Child Protection staff.

This rapid response was appreciated by the community and applauded as an example of how a city government could intervene by being proactive and could avoid causing further harm. Culturally specific programming and services remain underfunded, especially in immigrant and cultural communities, and therefore, it is imperative that prevention programs and other tools of engagement for young people be well-funded to prevent exploitation and human trafficking.

- Labor Trafficking and Labor Exploitation:

The City enacted four workers' rights ordinances.

- The first, enacted in 2016, requires employers to provide employees sick and safe leave benefits;
- Second, the City enacted a wage ordinance resulting in a minimum \$15 per hour wage, which is higher than that set by either state or federal law, with the cost of living adjustments in subsequent years;
- Third, the City passed a Wage Theft ordinance, requiring payment of a minimum wage and all wages owed to a worker, and creating new enforcement tools for the City and its workers;
- Finally, effective January 1, 2021, the City's Freelance Worker Protection ordinance extended new wage theft remedies to single-person independent contractors and entrepreneurs.

All four ordinances are applicable regardless of immigration status. The ordinances are being enforced by the City's Civil Rights Department and outreach and education about the ordinances is being provided to Minneapolis' immigrant and underserved communities in partnership with Centro De Trabajadores Unidos En La Lucha (CTUL) and The Awood Center. While the violation of these four ordinances amount to labor exploitation, these kinds of violations are also typical of labor trafficking situations, which also include force, fraud or coercion used against the victim. Often in labor trafficking situations, wage theft has been found to be the most common labor law violation. Ensuring a proper enforcement of these ordinances by the City will help to prevent labor trafficking.



- The passage of the adult entertainment protection ordinance in 2019, in close consultation and collaboration with adult entertainers in Minneapolis, not only ensures the physical safety and dignity at work, but also protects workers from labor exploitation, which was evident in the form of financial abuse by those in authority at their workplaces.

- Immigration:

Being an immigrant or refugee, regardless of status, puts people at a higher risk of human trafficking. Internationally, traffickers often lure people from foreign countries to the United States with the offer of providing good-paying legitimate jobs, but then force them into sex work, prostitution, domestic work<sup>ii</sup> without pay, construction<sup>iii</sup> and many other industries. Traffickers isolate victims and use threats, coercion, and blackmail, such as calling immigration authorities, to continue to subject people to exploitative and inhumane conditions.

Even for those residing legally in the United States, without proper infrastructure and mechanisms for immigrant integration, they are left to feel socially disconnected, hypervigilant, insecure, distrusting of law enforcement, and trying hard to fend for themselves and their family, which make these communities a perfect target for sex and labor trafficking. The actions and activities outlined below have helped create the necessary infrastructure to reduce the vulnerability of immigrant communities.

- In 2003, the City passed a separation ordinance, which prohibits city staff from inquiring about immigration status unless otherwise required due to the requirements of a state or federal program;
- In 2017, the City passed a U/T Visa ordinance and established a timeline for the MPD, the Civil Rights Department and the City Attorney's Office to respond to requests for law enforcement certifications for trafficking victims and crime victims so that victims can be placed on a pathway to obtaining immigration status;
- Beginning in 2017, the City has provided funding to non-profit immigration legal service providers who offer a variety of immigration support services to the City's immigrant and refugee community;
- The City joined organizations focused on developing policies and strategies promoting immigrant integration and inclusion, including Welcoming America, Cities for Action, and Cities for Citizenship;
- In 2018, the City staffed an Office of Immigrant and Refugee Affairs, the first office of its kind in the state of Minnesota;
- In 2018, the City passed a Municipal ID ordinance, with the goal of offering an identity document available to residents ages 14 and up, in order to connect Minneapolis residents to services, programs, and benefits, regardless of immigration status, homelessness or gender identity. However, this program is currently on hold.

### Pathways to Freedom in Action, Example 3

\$20,000 technical assistance dollars in the Pathways to Freedom Grant was repurposed to immediately respond to COVID-19 and the disproportionate impact it had on vulnerable communities, including transgender/GNC individuals working in the sex industry and documented and undocumented immigrants who had lost income due to the COVID emergency who did not qualify for local, state, or federal benefits. The \$10,000 commitment to the Black Visions Collective was leveraged to seek additional funding from the Women's Foundation. With the Women's Foundation contribution of \$7,500, a total of \$17,500 was awarded to the Black Visions Collective. The remaining \$10,000 was awarded to a collaboration among Navigate, Minnesota and CTUL.

- Incorporating Voices from Vulnerable Communities:

The City engages the community in its work, including survivor voices, in number of ways. First, the City's Neighborhood and Community Relations (NCR) Department has seventeen employees, including seven full-time employees who are embedded in under-engaged communities, including LGBTQ, African American, Southeast Asian, Latino, East African and Native American communities. The City's Office of Immigrant and Refugee Affairs is also housed within NCR. Staff within this department helps facilitate relationships and foster authentic communication as well as engage these communities and connect them with the City enterprise.

Recent examples illustrate how the City used survivor voices to inform its work. Survivors developed the "I Am Priceless" campaign, which focused on preventing youth from being recruited into sex trafficking as part of the City's 2018 Super Bowl sex trafficking initiative. The project involved a partnership between The Link, a non-profit organization that provides housing and services for youth survivors of sex trafficking and sexual exploitation, and experienced researchers from the University of Minnesota Urban Research and Outreach Engagement Center (UROC). Survivors were compensated for their work on the project. Also, the City's Environmental Health Inspection engaged UROC to conduct listening and research sessions with adult entertainers to inform the City's response to protect workers' health after evidence that human semen was detected on surfaces in some of the venues. This process resulted in the passage of the City's 2019 adult entertainment protection ordinance.

The Senior Advisor engaged with survivors and survivor leaders, including Survivor Alliance,<sup>iv</sup> one of the grantees of the funders, from the beginning of the project. The Blueprint, "A Holistic Response to Human Trafficking and Exploitation: A Framework for Action" is a direct outcome of such engagements during the grant.

The City also has created a Transgender Equity Council with representatives from the transgender and gender non-conforming (GNC) communities to help advise the City on policy and actions involving those communities. The council has been reviewing policies and practices that limit the social and economic mobility of transgender individuals. For example, the council

has advocated for the municipal ID, gender inclusive restrooms; to provide incentives to Minneapolis businesses to receive trainings on trans/GNC issues; and for anti-discrimination training for landlords and shelters in order to address persistent homelessness of trans/GNC individuals.

#### Pathways to Freedom in Action, Example 4

The Senior Advisor engaged with the Transgender Equity Council<sup>v</sup> (TEC) since the early implementation of the grant. She participated in the TEC's Public Awareness and Community Engagement subcommittee and the planning of Trans Equity Summit. This active participation helped the Senior Advisor to develop and to strengthen the relationship with TEC members and staff. Additionally, it helped to identify key areas for collaboration, to uplift the Council's work at the state and national level, to make necessary connections with external stakeholders, groups, and funders, and to secure tangible resources in the form of money and research expertise. As a result, the Women's Foundation of Minnesota became one of the donors that sponsored the Trans Equity Summits in 2019 and 2020. The foundation also expressed a strong interest and commitment to provide any kind of help, monetary or otherwise, with the TEC's public awareness campaign.

Likewise, the internal coordination between the Transgender Equity Project Coordinator, Labor Standards Enforcement, Civil Rights, and the Senior Advisor resulted in an opportunity to raise greater awareness of economic exploitation including underemployment, wage theft, underpayment, working overtime, and unfair scheduling, in addition to other kinds of harassment of Trans/GNC employees at workplaces, which pushed them out of the traditional labor market into an underground economy of transactional sex, thereby exposing them to physical and sexual violence. The outcome was a Public Service Announcement<sup>vi</sup> video with Council Vice President, Andrea Jenkins, the first black transgender woman elected to any office in the United States. Jenkins addressed the issue of economic and labor exploitation as a measure to prevent human trafficking. This tactic would help to end all kinds of injustices and discrimination in workplaces so those who do not want to choose sex work should be able to do so and not feel forced into that choice merely because of their workplace conditions.

The City has also created and invested in programs that help develop a safer and healthier city for all its residents. This commitment is evident from its investment and partnership in other areas. These programs include:

- Office of Police Conduct Review within the Civil Rights Department
- Collaboration with Hennepin County to create Heading Home Hennepin Continuum of Care response
- Step Up, embedded within Community Planning and Economic Development, is a professional youth development program that supports historically underrepresented youth in Minneapolis
- MPD's Homelessness and Vulnerable Populations Initiative

- City Attorney's Office Criminal Justice Reform Initiatives –
  - ✓ Sign and Release Warrants in lieu of arrest, jail & bail
  - ✓ Bail Reform: New Risk Assessment Tool; Warrant Forgiveness Day; Shoplifting Diversion Program, Driving Diversion Program (DDP), Pathways to New Beginnings Gun Diversion Program, and the new Renew Domestic Violence Diversion Program
  - ✓ Community Restorative Justice
  - ✓ Restorative Court
    - Use Social Workers to address needs
- Violent Crime Hot Spot Intervention Program
  - ✓ Byrne Grant – Community-led safety strategies: Little Earth of United Tribes

The City also continues to benefit from private and government investment in areas of sexual exploitation/sex trafficking and labor trafficking in Minnesota:

- Minnesota Department of Health Safe Harbor Program, which provides funding for regional navigators, supportive services, and outreach, training, protocol development, and evaluation;
- Hennepin County No Wrong Door program<sup>1</sup> that creates a county child welfare response to at-risk and sexually exploited youth. The program employs a Coordinator who oversees the development of the response. The Hennepin County Human Services division hired two case workers to work with sexually- exploited youth;
- The Minnesota Department of Human Services funds several organizations that provide emergency, transitional and permanent housing for sexually exploited youth and conducts street outreach;
- Safe Harbor Expansion Project at the MDH funded by The Office of Victims of Crime, which integrates labor trafficking into the current state Safe Harbor Program;
- BCA Human Trafficking Investigation Task Force;
- The Safe Harbor Protocol Guidelines developed in partnership between the Ramsey County Attorney's Office, the Sexual Violence Justice Institute (SVJI), and the Minnesota Coalition Against Sexual Assault (MNCASA);
- The Hennepin County Attorney's Office Expungement program in partnership with the Ramsey and Washington County Attorney's offices.

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<sup>1</sup> In 2014, Hennepin County implemented "No Wrong Door" plan to address juvenile sexual exploitation and sex trafficking in Hennepin County. Since then, it has grown into an initiative providing supportive services, case management, and emergency shelters, etc.

## Pathways to Freedom Grant

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Although the City of Minneapolis began its anti-trafficking initiative as early as 2010 through the City Attorney's Office and the Minneapolis Police Department, the focus remained narrow – sex trafficking and sexual exploitation of juveniles as well as how to address it. The need to expand the focus to include labor trafficking and exploitation, regardless of age, and to address these from a more holistic framework led the City to apply for the Pathways to Freedom Challenge Grant<sup>2</sup> in the Fall of 2017. This was partly based on the study<sup>vii</sup> done by The Advocates for Human Rights on labor trafficking, which indicated that labor trafficking is an issue in Minneapolis. In February 2018, Minneapolis was awarded the two-year grant to support a full-time staff position and additional money for technical assistance. Foreseeing how significantly the pandemic would affect the grant, the funder extended the deadline to submit the deliverable, at no extra cost to them, bringing the final extension to April 2021.

The primary goal of the Pathways to Freedom Grant was to help the city develop a coordinated, comprehensive, holistic, city-wide response to human trafficking - sex trafficking and labor trafficking and exploitation - sexual exploitation and labor exploitation, with a special focus on marginalized communities – Indigenous communities, communities of color, LGBTQ, and immigrant communities. Another goal was to provide support to survivors, while also addressing the root causes of trafficking and exploitation. The newly hired Senior Advisor was tasked, in collaboration, coordination, and consultation with internal and external stakeholders, to deliver a blueprint for action, including policy recommendations and best practices.

In April of 2019, a City Council Resolution,, authored by Council Member Cano, expanded the juvenile sexual exploitation workgroup and its focus to include labor trafficking and exploitation of all people, regardless of age, and advance the work, as pronounced in the Pathways to Freedom Grant, through an internal team, later to be named HEAT (Human Exploitation and Anti-Trafficking) Task Force.<sup>3</sup> This Blueprint is a result of a series of conversations with HEAT Task Force members, one-on-one and group conversations, community engagements by invitation, neighborhood and block meetings, and interactions with different internal bodies and survivor groups, which was an essential requirement of the grant. The name of each person and organizations we interacted over the course of the project are found on the City's trafficking webpage.<sup>viii</sup>

In June of 2019, The Advocates for Human Rights came on board as a consultant to help develop the City's response to labor trafficking. Additionally, over the course of the grant period, a formal collaboration was established, through contracts with other community organizations, such as Black

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<sup>2</sup>Pathways to Freedom was one the third challenges of the Partnership for Freedom initiative, "a public-private partnership to spur innovative solutions to human trafficking challenges. Humanity United and the NoVo Foundation led this final challenge. City of Minneapolis, Chicago, and Atlanta were awarded the grants.

<sup>3</sup> HEAT Task Force is an expansion of the City's Juvenile Sexual Exploitation workgroup that engaged different departments to implement the Pathways to Freedom grant.

Visions Collective, Navigate, MN, and CTUL<sup>4</sup>, Humphrey School of Public Affairs<sup>5</sup>, University of Minnesota, Cedar Riverside Neighborhood Organization, Transgender Equity Council, and Rainbow Research. The data and information gathered through these collaborations has helped shape the recommendations in the Blueprint.

These recommendations take a holistic approach to addressing human trafficking that looks at systemic causes and a wide range of responses beyond the work of a single officer or person dedicated to anti-trafficking efforts. Furthermore, these recommendations are made in the context of City work already taking place and existing commitments that will help prevent trafficking and support survivors, in addition to their primary purpose. To illustrate, when the City enterprise works to meet its goal of eliminating racial disparities in housing, this, in turn, helps prevent trafficking and exploitation of people from BIPOC communities because a majority of exploited and trafficking victims from BIPOC communities experience homelessness in addition to other issues.<sup>ix</sup> News of sexual exploitation and trafficking of people at homeless encampments in Minneapolis brought the issue and inevitable connection to the forefront and into the public consciousness.<sup>x</sup> Lieutenant Grant Snyder, formerly with the MPD's sex trafficking unit and until recently with the MPD's Homeless and Vulnerable Communities initiative, had often educated people and trained professionals on this major issue – homelessness – as a contributing cause to exploitation and trafficking. The Framework for Action offers guidance on how different aspects of the City's work advances the cause of preventing human trafficking and highlights where human trafficking considerations should be incorporated into ongoing work that might otherwise neglect to include the needs of survivors.

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<sup>4</sup> Additionally, the Labor Standards Enforcement, Civil Rights Department has entered into a contract with CTUL since 2019 to conduct outreach to vulnerable workers on issues related to the City's labor ordinances – wage theft, sick and safe time, and minimum wage. This has resulted in complaints on violations of one or a combination of these ordinances by low wage workers, majority of whom are from communities of color.

<sup>5</sup> City of Minneapolis in collaboration with Center on Women, Gender, and Public Policy and Center for Urban and Regional Affairs sponsored "Reimagining Expungement," a tool that helps to make expungement accessible by victims/survivors of sexual exploitation (prostitution).

### Scope of Human Trafficking and Exploitation in Minneapolis

As the largest urban center and most populous city in Minnesota, Minneapolis is impacted by both sex and labor trafficking because of the kind of industry in the city and the city's demographics. Minneapolis has a significant, thriving, immigrant community (15.5% of the population is foreign-born according to U.S. Census Bureau data). An aggregated data report put together for OIRA (Office of Immigrant and Refugee Affairs) by a team of Humphrey researchers, estimated a total of 15,000 (14,748 in 2018) undocumented individuals living/working in Minneapolis. Not having a legal status in the US is a risk factor for someone to be exploited and trafficked.

A significant population who are living in poverty or below the poverty line are from communities of color and Native American communities. "Thirty-four percent of American Indians live in poverty in Minnesota, compared to 27% of Black and 7% of White Minnesotans."<sup>xi</sup> Minneapolis has the largest concentration of people of color and Native Americans in the state of Minnesota.

Studies conducted throughout Minnesota and in Minneapolis have pointed to the fact that Native Americans and communities of color are disproportionately affected by sexual exploitation and sex trafficking.<sup>6xii</sup> And, when it comes to labor trafficking, although there are not as many locally-conducted studies, anecdotal evidence from service providers and labor rights advocates clearly prove that that communities of color – low-wage workers, immigrant communities – undocumented, and LGBTQ communities – are victimized more, as compared to other groups of people. Victims of the first few labor trafficking cases that have been tried in Minnesota courts were predominantly from communities of color.<sup>xiii</sup> The underreporting of labor trafficking is due to the fact that there's less awareness and training on labor trafficking for professionals, including law enforcement, and service providers.

Minneapolis is also home to the top five industries – accommodation and food services; administrative and support and waste management and remediation services and agriculture, forestry, fishing, and hunting; arts, entertainment, and creation; and construction – which have been historically responsible for exploitation and human trafficking. For example, within a mile circumference of downtown Minneapolis, there are 17 adult entertainment establishments and 250 massage parlors. These businesses have been known to have the worst working conditions. Violations include wage theft, no sick and safe time, long hours without breaks, forced labor, sexual exploitation, and sex trafficking. These violations were reported by advocates and workers and documented in the study<sup>xv</sup> done on adult entertainment clubs in Minneapolis, which was commissioned by the Minneapolis Health Department. The City's Business Licensing have found some massage businesses to have engaged in prohibitory acts and unusual behaviors, amounting to human trafficking, which has resulted in the closure of a few illicit businesses. Recent reports by workers' rights' centers and grassroots organizations have also highlighted exploitation and labor trafficking in Minneapolis' booming construction industry.<sup>xvi</sup>

From 2015-2019, the number of people arrested for prostitution – selling only - in Minneapolis was 89 - 82 female and 7 males; 35 Black, 23 Native American, 1 Hispanic, 29 White, and 1 Other. It is important

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<sup>6</sup> Native American women also experience domestic and sexual violence far higher than any other population.

to note that these were individuals who encountered the criminal justice system; there were many who did not. A data report put together by Cornerstone, a nonprofit that operates a statewide hotline for human trafficking, domestic violence, and sexual violence victims, shows that they made 108 contacts who identified themselves as Minneapolis residents. One hundred and six of these residents had sex trafficking/sexual exploitation as their primary victimization while two revealed labor trafficking. The total number of contacts they made in 2019 was 420. In 2020, they made 385 contacts – 91 from Minneapolis, of which 90 identified sex trafficking/sexual exploitation victims and one as a labor trafficking victim. Majority of the victims in 2019 and 2020 were from Minneapolis.

The Family Partnership and The Link, two nonprofits in Minneapolis, have continuously reported that the highest numbers of victim/survivors they serve are from and in Minneapolis.

### Vulnerability and Risk Factors

A recently released 2019 Minnesota Student Survey, further highlighted key factors in youth that make them highly vulnerable to exploitation and trafficking including in Minneapolis. The report highlights that 5000 high school age students in the state have traded sex in return for something of value – food, shelter, money, drugs, alcohol, etc.<sup>xvii</sup> Advocates, professionals and researchers believe this to be a low estimate due to numerous factors, such as hesitancy to admit trading sex for something of value, absence from school during survey administration, and whether youth had access to the survey overall.

Minneapolis youth exhibit higher levels of multiple risk factors when compared to all of Hennepin County youth. Adverse childhood experiences reported by Minneapolis ninth graders (Figure A) include: 3.5% reporting having been tricked or forced into sex by a friend or family member, 4.3% reporting having been tricked or forced into sex by someone who was not a friend or family member, and 2.2% report having traded sex for something of value (Minnesota Student Survey, 2019).

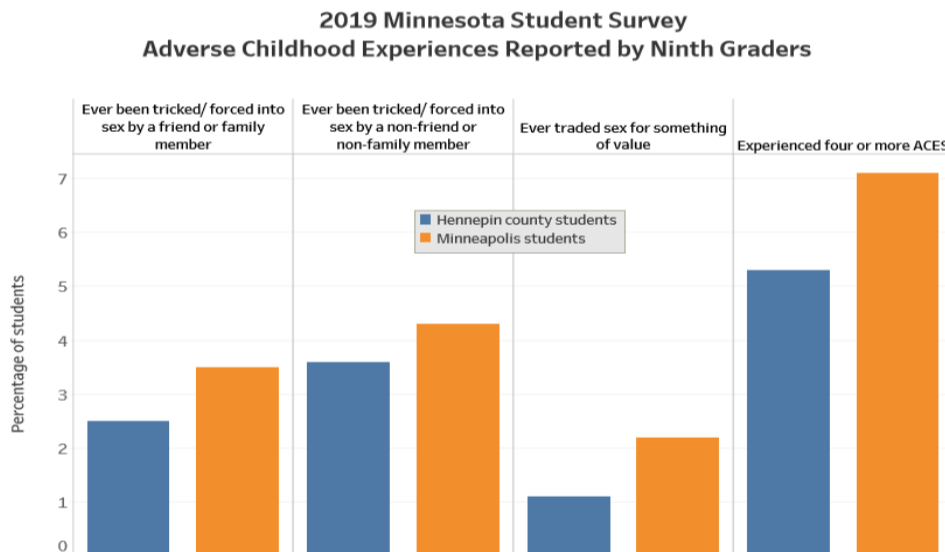


Figure A



When examining intimate partner relationships, Minneapolis students also reported higher levels of risk than Hennepin County students (Figure B). Among Minneapolis ninth graders, 3.7% reported being physically hurt by a partner, 5.7% report being pressured, tricked, or forced into sex by a partner, and 9.6% report being verbally hurt or feeling controlled by their partner (Minnesota Student Survey, 2019).

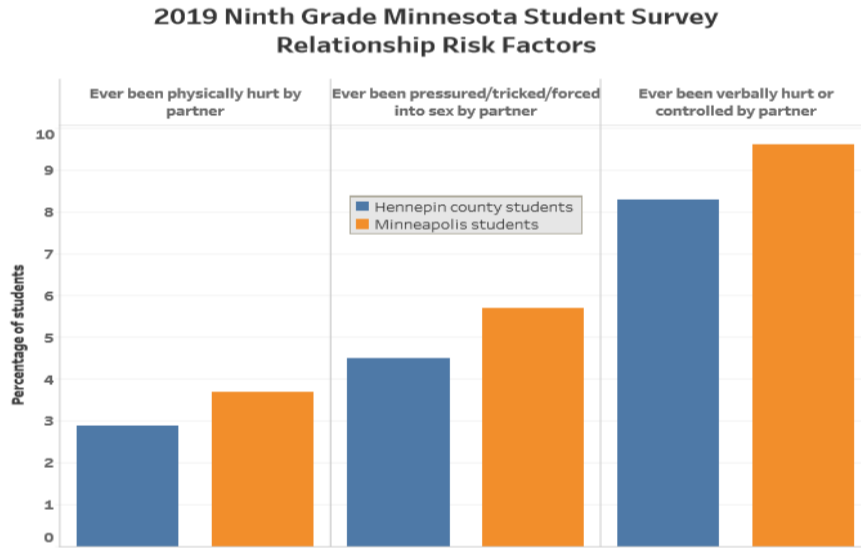


Figure B

Minneapolis youth also report higher levels of risk regarding family and home life than Hennepin County youth (Figure C). Among Minneapolis ninth graders, 4.0% report having been in foster care, 6.6% report having run away, 5.9% report having been homeless within the last twelve months, and 15.6% report having a parent or guardian incarcerated (Minnesota Student Survey, 2019).

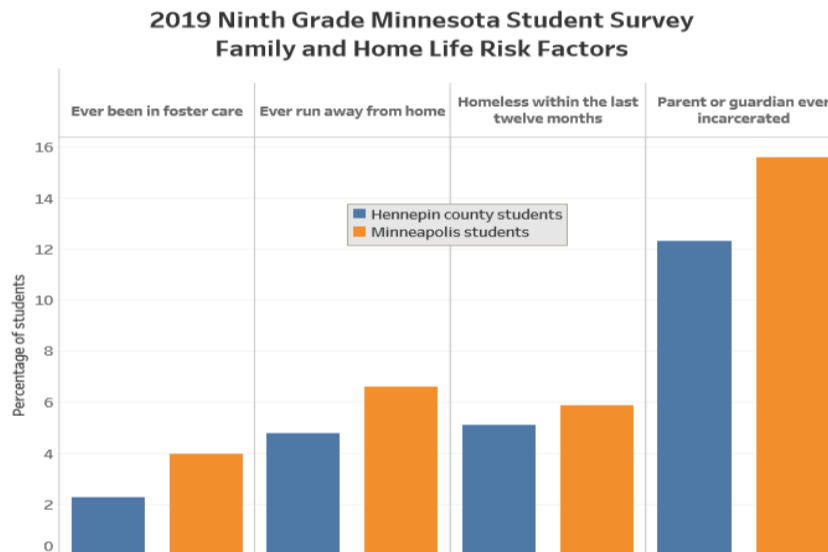


Figure C

Both Minneapolis youth and Minneapolis adults report higher levels of substance abuse than youth and adults in Hennepin County. Minneapolis ninth graders were more likely to use alcohol, tobacco, vaping products, marijuana, and opioids than ninth graders from all of Hennepin County (Figure D) (Minnesota Student Survey 2019). Among Minneapolis adults, 34.5% report binge drinking within the last 30 days, while only 29.4% of adults in Hennepin County report binge drinking within the same time frame. (Hennepin county SHAPE Survey, 2018).

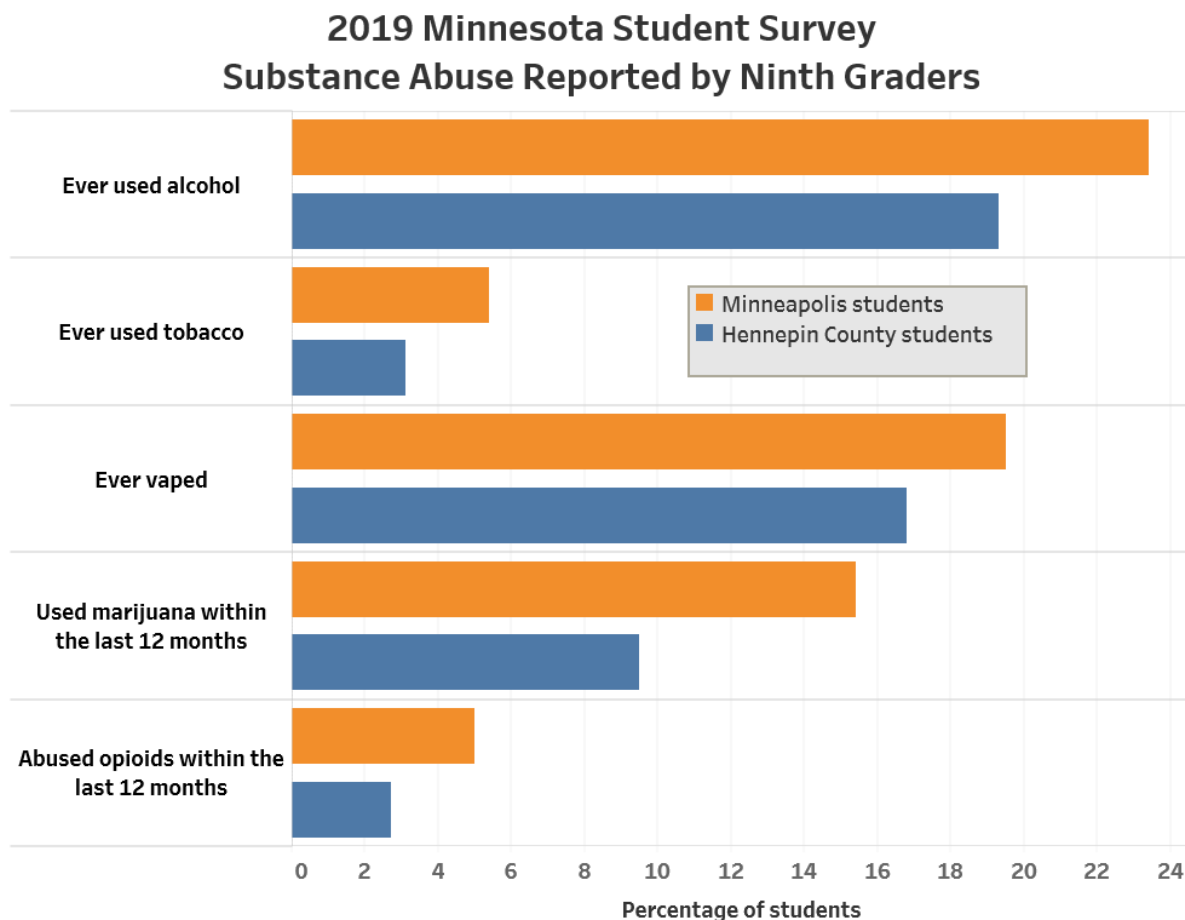


Figure D

Minneapolis youth and adults also report poorer mental health when compared to youth and adults in Hennepin County. When surveyed, 44.7% of ninth graders in Minneapolis report having been treated for a mental health, emotional, or behavioral issue, compared to only 23.1% of Hennepin County ninth graders (Minnesota Student Survey, 2019). Of Minneapolis adults, 6.9% report experiencing serious psychological distress within the last 30 days. For Hennepin County adults, only 4.9% report experiencing serious psychological distress within the last 30 days. (Hennepin County SHAPE Survey, 2018).

The prevalence of these factors in youth in Minneapolis at a higher rate than the rest of the youth in Hennepin County should be viewed as representative of the adult population in Minneapolis and the reason why Minneapolis is a thriving market for all kinds of exploitation and trafficking of youth and adults in labor and sex industries.

Minneapolis also has a much higher proportion of people at risk due to their gender or sexual identity than Hennepin County. When surveyed, 4.4% of Minneapolis ninth graders did not identify as cis-gender and 29.8% did not identify as heterosexual. In Hennepin county, 3.1% of ninth graders did not identify as cis-gender and 21.7% of ninth graders did not identify as heterosexual (Minnesota Student Survey, 2019). In the survey 5.9% transgender students reported trading sex while the percentage was 1.2% for Cisgender boy and 1.3% for Cisgender girl.<sup>xviii</sup>

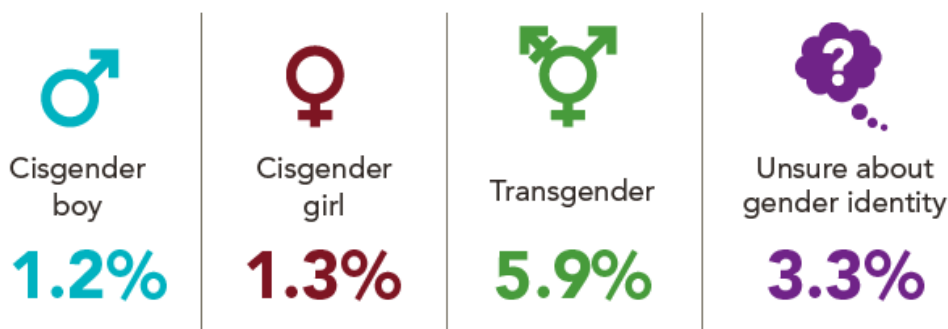


Image source.<sup>xix</sup>

For Minneapolis adults, 15.8% identify as LGBT, while only 8.3% of Hennepin County adults identify as LGBT (Hennepin county SHAPE Survey, 2018). Those identifying as lesbian, gay, bisexual, transgender, queer, or questioning are particularly at high risk of being exploited and trafficked.<sup>xx</sup>

In addition to these, disability (physical and mental), immigration status, race/ethnicity, age, prior victimization – childhood sexual abuse, domestic violence, sexual violence, and involvement in gangs are other key risk factors for human trafficking and exploitation.<sup>xxi</sup>

### Definition of Sex and Labor Trafficking and Exploitation

The City of Minneapolis’ response to human trafficking and exploitation is guided by relevant state and federal laws as well as an expansive understanding of trafficking and exploitation, including situations that do not fall fully under the law. Broadly, human trafficking occurs when an individual performs labor or sexual activities and does not feel they can stop or leave. Human exploitation is a situation when the individual performing the labor or sexual activities is not compensated fairly, is exposed to unsafe conditions, or is not treated with dignity. However, it becomes challenging to identify exploitation, sex trafficking, and labor trafficking, because victims often experience a combination of all three at once or some degree of all three at different points while being victimized.

**Labor exploitation** is not specifically defined by law but is generally covered by federal, state, and city laws regulating work hours, pay, safety, discrimination, and other issues. These laws are primarily civil laws enforced by administrative agencies or private lawsuits. Minnesota state law imparts criminal liability for wage theft with intent to defraud. The City of Minneapolis' labor ordinances define violations of the City's minimum wage, safe/sick time, and wage theft as labor exploitation and has the authority to investigate and seek civil remedies and recourse.

**Sexual exploitation** is also not specifically defined by law, but it is generally covered by state and federal criminal statutes governing commercial sexual activity and criminal sexual conduct. In contrast, sexual exploitation of minors is specifically mentioned in the state's child protection statute<sup>xxii</sup> and is also covered under the state's Safe Harbor for Youth Act.<sup>xxiii</sup>

Generally, in Minnesota, the relentless advocacy done by Breaking Free, MIWRC (Minnesota Indian Women's Resource Center), The Family Partnership, The Link, MIWSAC (Minnesota Indian Women's Sexual Assault Coalition), The Advocates for Human Rights, UROC (Urban Research and Outreach-Engagement Center) University of Minnesota, MNCASA (Minnesota Coalition Against Sexual Assault), and many others in the metro and greater Minnesota, and reports such as *Sex Trafficking Needs Assessment for the State of Minnesota*,<sup>xxiv</sup> *Shattered Hearts: The Commercial Sexual Exploitation of American Indian Women and Girls in Minnesota*,<sup>xxv</sup> *Garden of Truth: The Prostitution and Trafficking of Native Women in Minnesota*,<sup>xxvi</sup> *The Prostitution Project: Community-Based Research on Sex Trading in North Minneapolis*,<sup>xxvii</sup> *Mapping the Demand: Sex Buyers in the State of Minnesota*,<sup>xxviii</sup> and the recently released reports *Trading Sex and Sexual Exploitation among High School Students*,<sup>xxix</sup> and *Missing and Murdered Indigenous Task Force: A Report to the Legislature*,<sup>xxx</sup> have helped to transform the notion that prostitution is a victimless crime to the idea that it is a failure of a larger societal structure. Prostitution needs to be understood in the context of colonization, racism, sexism, transphobia, and a clear imbalance of power - who is buying, and who is being bought and sold. The state's sex trafficking laws are a reflection of this acknowledgment, where the promotion of prostitution, or "pimping", is defined as sex trafficking, a felony-level crime where the facilitator of the selling and those buying sexual activity bear criminal consequences, and consent and elements of force, fraud, and coercion are deemed irrelevant.

Safe Harbor for Youth Act went a step further and criminalized the act of engaging in sexual activity with youth under 18 regardless whether a third party benefitted from it. All these studies have helped view prostituted people as sexually exploited victims and thus needing non-judgmental, supportive services and care. Lt. Snyder and former City Attorney Segal helped create a greater awareness in the City enterprise that there is a strong connection between prostitution and racial justice, and weaved it into Council resolutions, the creation of pre-charge diversion programs, and the unofficial policy that prostituted individuals not be arrested. The recent resolutions of 2018 and 2019 reaffirmed the City's commitment to viewing prostituted individuals as victims of commercial sexual exploitation.

**Commercial sexual exploitation is inherently harmful and defined as sexual abuse of someone through the act of commercial sexual activity. Commercial sexual activity occurs when anything of value or a promise of anything of value, such as money, drugs, food, shelter, protection, and other basics of life, is provided to a person by any means in exchange for any type of sexual activity. A third person may or may not be involved. (City Council Resolution 2018)**

Federal and state laws provide different definitions of labor trafficking, but they cover many of the same situations. Both state and federal definitions are relevant to the City's response. The MPD investigates human trafficking under state law, while Minnesota law also provides services for victims of sex trafficking under age 24 and decriminalization of minors under age 18. Federal law provides important benefits for foreign national victims of human trafficking and Minneapolis city officials can assist victims in accessing those benefits.

Minnesota Statute § 609.281(5)

"Labor trafficking" means:

(1) the recruitment, transportation, transfer, harboring, enticement, provision, obtaining, or receipt of a person by any means, for the purpose of:

(i) debt bondage or forced labor or services;

(ii) slavery or practices similar to slavery; or

(iii) the removal of organs through the use of coercion or intimidation; or

(2) receiving profit or anything of value, knowing or having reason to know it is derived from an act described in clause (1).

Federal Statute 22 U.S.C. § 7102(11)

The term "severe forms of trafficking in persons" means—

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

Both statutes cover situations where a person is made to work and cannot stop or leave because of physical force, restraint, abuse of the legal process, controlling another's identification documents, blackmail, or debt bondage. Federal law explicitly covers fraud and threats of serious non-physical harm as well.

Federal and state laws also define sex trafficking differently. Under Minnesota state law, sex trafficking is any prostitution arranged by a third party or where a third party profits from the transaction; the use of force, fraud, or coercion is irrelevant. Under federal law, sex trafficking includes a minor being induced to perform any commercial sex act or an adult being induced to perform a commercial sex act using force, fraud, and coercion. In other words, under federal law, for a minor to be defined as a sex trafficking victim, the use of force, fraud or coercion is not required.

Minnesota Statute § 609.321

Subd. 7a. Sex trafficking.

"Sex trafficking" means:

- (1) receiving, recruiting, enticing, harboring, providing, or obtaining by any means an individual to aid in the prostitution of the individual; or
- (2) receiving profit or anything of value, knowing or having reason to know it is derived from an act described in clause (1).

Federal Statute 22 USC 7102(11)

The term "severe forms of trafficking in persons" means—

- (A) sex trafficking in which a commercial sex act is induced by force, fraud, or coercion, or in which the person induced to perform such act has not attained 18 years of age.

The resources and organizations found on the City's trafficking webpage<sup>xxxii</sup> can offer more information on human trafficking definitions and dynamic.

### Safe Harbor for Sexually Exploited Youth

The movement to decriminalize youth involved in prostitution and "survival sex<sup>xxxiii</sup>" led to the passage of the Safe Harbor for Sexually Exploited Youth Act 2011. Those working with youth in homeless shelters, criminal justice systems, schools, counselors, therapists, and sexual assault and child sexual abuse advocates had discovered that youth experiencing these issues were trading sex in return for something of value, either material or emotional, mainly to survive; they were being taken advantage of by those who had resources and exerting power and influence over them. The law articulated such "engagements" as commercial sexual exploitation for those under 18. The age limit was later increased to 24 in 2016, in order to make youth 18-24 eligible for safe harbor services.

The table below, as provided by Minnesota Department of Health, outlines significant changes in other MN statues due to Safe Harbor and a timeline for implementation of the law and its subsequent programs and services in the form of No Wrong Door.

Lt. Snyder and former City Attorney Segal, regionally recognized experts on sex trafficking, played key roles in the passage of Safe Harbor and also advocated for services and programs for adults involved in

transactional sex – “sex trafficking, commercial sexual exploitation, independent selling or trading sex, and sex work” (as defined in the Safe Harbor for All report).

#### Safe Harbor Legislative Timeline<sup>xxxiii</sup>

The Safe Harbor Law, passed in 2011, included five key changes – three were effective immediately in 2011, while two additional changes took effect in 2014. In 2011, Minnesota:

Added a definition of sexually exploited youth in Minnesota’s child protection codes;

Increased the penalties against commercial sex abusers or purchasers; and

Directed the Commissioner of Public Safety to work with stakeholders to create a victim-centered, statewide response for sexually exploited youth.

In 2014, the law excluded sexually exploited youth under 18 from the definition of delinquent child. This change resolved the conflict that defined a sexually exploited youth as both a victim and delinquent. If youth engage in conduct that relates to being hired, offering to be hired or agreeing to be hired by another individual to engage in sexual conduct, they cannot be charged with a crime for this act.

The State also appropriated budget to implement a service model called “No Wrong Door” – making resources and services available for sexually-exploited youth including regional navigators, housing and shelter, comprehensive services, and training and protocol development.

In 2016, Safe Harbor services were made available to individuals 24 and younger, increasing the prior eligibility age for services from 18.

#### The Future of Safe Harbor and Safe Harbor for All

In 2014, Minnesota’s Safe Harbor law and supportive services came into full effect. In the six years since that point, the Safe Harbor system has steadily improved its response to victims of sex trafficking and sexual exploitation for 24 years old and under. In the first full year of the response, providers saw approximately 350 clients. Between April 2017 and March 2019, Safe Harbor providers saw over 1200 clients. In the most recent evaluation, both grantees and youth interviewees felt that the Safe Harbor system “improves youth’s connections with safe adults, understanding of healthy relationships, stability in basic needs and housing, and learning life skills and/or gaining independence.” The evaluation also identified a need for increased training, especially for government workers, and collaborations across disciplines.<sup>7</sup>

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<sup>7</sup> All data in this paragraph from [https://www.wilder.org/sites/default/files/imports/SafeHarbor\\_EvaluationReport\\_9-19.pdf](https://www.wilder.org/sites/default/files/imports/SafeHarbor_EvaluationReport_9-19.pdf).

The success of the Safe Harbor model for youth 24 years old and younger has led to a statewide conversation about expanding the Safe Harbor model to all ages. A consortium of organizations led by the University of Minnesota’s Urban Research and Outreach-Engagement Center (UROC)<sup>8</sup> published a report on Safe Harbor for All<sup>xxxiv</sup> that identified the range of opinions on partial decriminalization in Minnesota and some of the challenges of implementing it. Under the direction of the state legislature to the Minnesota Department of Health (MDH), three organizations were tasked with researching and publishing a report – UROC, Advocates, and Rainbow Research. MDH was then tasked with submitting a strategic plan to the legislature based on the report, which it did in January 2019. Without exception, respondents surveyed for the Safe Harbor for All report identified significant harms associated with the current system of full criminalization and suggested a range of responses to mitigate those harms.<sup>xxxv</sup>

***Sex trafficking and exploitation in transactional sex (selling or trading sex) violates basic human rights to safety, self-determination, health, and dignity. This happens to adults in Minnesota. It causes numerous harms including violence, threats of violence, abuse, loss of children, instability, physical and mental health problems, and much more. All adults who are trafficked for sex or involved in transactional sex in Minnesota experience collateral harms due to stigma and criminalization of prostitution, including lack of housing, discrimination, and lack of police protection.***<sup>xxxvi</sup>

In addition to the key recommendations, this extensive engagement process also helped to break down some key terms and concepts which has helped to further a productive conversation, without judgment and polarization of issues, around prostitution, sex work,<sup>xxxvii</sup> and those who define their experience in prostitution and sex work as commercial sexual exploitation and hence choose to define themselves as victims/survivors. It has provided a framework broadly categorizing these varied experience as “lived experience.” The blueprint has drawn upon these definitions to draft policy recommendations, and has broadly worked at the intersection of issues, common themes/harms, and advocated for resources and support for ALL regardless how they choose to see their involvement in transactional sex. For example, one of the key recommendations includes ending criminalization of those in transactional sex.

Lived experience: having personal experience in transactional sex and included victims and survivors of trafficking and exploitation, independent sellers/traders of sex, and sex workers.

Transactional sex: can take many forms, including sex trafficking, commercial sexual exploitation, independent selling or trading sex, and sex work.

Implementation of recommendations in the ***Safe Harbor for All*** report and analysis of existing City policies were some of the key activities identified in the grant proposal and re-emphasized its relevance and importance for the project very early on in the design phase of the initiative. It was also one of the

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<sup>8</sup> The Advocates for Human Rights and Rainbow Research were the other members of the consortium.



key interests of the funders, especially NoVo Foundation: preventing and ending commercial sexual exploitation through survivor engagement<sup>xxxviii</sup> for which the grant was awarded to Minneapolis.

However, rather than conducting extensive survivor engagement, the Pathways to Freedom initiative, in consultation with the portfolio manager, strategically decided to use existing resources and research drawn from the experience of survivors and survivor leaders such as *Garden of Truth, Safe Harbor for All*, and others mentioned above. The design and process involving survivors to gather recommendations for Objective #5 in the section “Framework for Action” reflects that strategic decision.

Here’s an excerpt from the survivors’ report:

A group of seven survivor consultants and two facilitators convened to discuss experiences with various departments of the City of Minneapolis and recommendations for how the City could improve the lives of survivors of sexual exploitation in Minneapolis moving forward, in partnership with the Senior Advisor. This project sought to center the leadership and expertise of Black and Native survivors to identify both specific actions and general recommendations to move the City forward. This was not a new data collection process; rather, it was a process to review existing data and selected policies and create resultant recommendations for the City of Minneapolis, by survivors.

The intention of the process was to bring together Black and Native survivors of sexual exploitation who had expertise in Minneapolis systems to review prior recommendations, existing City policies that have created barriers for adult survivors of commercial sexual exploitation to live healthy, safe lives, and reflect on their own experiences to determine policy recommendations for the City of Minneapolis to improve city-level responses to survivors of exploitation.<sup>xxxix</sup>

The project to engage survivor consultants was sponsored by the Women’s Foundation of Minnesota and the Pathways to Freedom Grant. The City contracted with Rainbow Research, that helped to design the process of engagement, facilitated meetings, and drafted the report in active partnership with seven survivor consultants, who were compensated for their time and expertise, and the City’s Senior Advisor.

### **Expanding Minnesota’s Response to Human Trafficking**

At the same time the state began exploring Safe Harbor for All, the Minnesota Department of Health received a federal grant to expand their anti-trafficking work to include labor trafficked youth 24 years of age and under. As training and outreach on labor trafficking increased as a result of the grant, the number of labor trafficking victims identified by service providers rose six-fold, from 63 in 2015, to 394 in 2017.<sup>xl</sup>The Advocates for Human Rights received a subgrant to develop Labor Trafficking Protocol Guidelines that provide guidance to communities looking to improve their identification of and response to labor trafficking. In 2019, the MDH received a second Office of Victims of Crime (OVC) grant to continue its labor trafficking work, specifically, the development of a labor trafficking law enforcement protocol with the BCA. In both the first and second grants, the MDH expanded its relationships with nine MN tribal nations.

## Next Steps

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These trends offer an opportunity for Minneapolis to assume a leadership role in adopting a comprehensive response to labor and sexual exploitation and trafficking for all ages, building on the successes of Safe Harbor and the findings of the *Safe Harbor for All* report and the *Labor Trafficking Protocol Guidelines*.

### Best Practices in Combating Human Trafficking and Exploitation

#### Core Values

Both the Safe Harbor system and the Labor Trafficking Protocol Guidelines are grounded in a similar set of core values focused on protecting and supporting the victims of trafficking. These values were originally drafted with youth in mind, but many can also apply to situations involving adults. Any response developed for the City of Minneapolis must have these values at the forefront.

- City staff must prioritize the victim's safety and well-being;
- City staff should be committed to understanding human trafficking and exploitation;
- Individuals who are trafficked or exploited are victims of a crime and should be treated as victims, not as perpetrators;
- Victims should not feel afraid, isolated, or trapped;
- Any response should be comprehensive and based in trauma-informed care;
- The response also should be tailored to the needs of individual victims, including services that are gender-responsive, culturally competent, age-appropriate, and supportive for youth who are gay, lesbian, bisexual, transgender, and questioning (LGBTQ);
- Victims have a right to privacy and self-determination, including the right to understand and consent to the data that is collected and shared about them;
- Human trafficking and exploitation can be prevented.<sup>xli</sup>

#### Key Needs

Victims of human trafficking and exploitation can have a complex array of needs, requiring the cooperation of many different organizations and governmental entities. Here is an overview of key services from the Sex Trafficking and the Labor Trafficking Protocol Guidelines. Some of these can be offered directly by city staff and others through partnerships with community organizations.

#### Services Directly Provided by City of Minneapolis

- Protections for Minors, Vulnerable Adults, and Foreign Nationals
- Criminal Accountability
- Civil and Administrative Remedies

#### Services Provided in Partnership

- Victim Advocacy
- Safety Plans
- Housing

- Transportation
- Legal Needs
- Physical Health
- Mental Health and Counseling
- Education
- Employment

### Current Challenges and Gaps in City of Minneapolis Response

The city is a complex system that has many moving parts that may not necessarily interact with each other but nonetheless play a significant role to advance the city’s mission and goals. By applying for the Pathways to Freedom Grant, the City pledged to work towards preventing and ending human trafficking and exploitation of all people in Minneapolis. However, there are significant challenges that the City continues to experience:

- ✓ Lack of awareness of different forms of human trafficking – especially labor trafficking
  - ✓ Unaffordable housing/homelessness
  - ✓ Poverty/underemployment in Native American and communities of color
  - ✓ Lack of coordination of response within the city and with service providers
- Lack of awareness of different forms of human trafficking: Labor enforcement officers lack in-depth knowledge on the correlation between labor laws and their violations and labor exploitation and trafficking. As a result, the enforcement of policies, such as minimum wage and safe/sick time, has not received enterprise-wide reception and as much internal material support for its enforcement. Policies and initiatives like the anti-wage theft ordinance, worker-driven social responsibility, fair procurement practice, to mention a few, will help to strengthen labor laws and their enforcement, and empower workers to hold employers at all levels of the supply chain accountable for creating economic justice driven workplaces – people free from labor exploitation and trafficking. The city must develop concerted outreach efforts to stakeholders inside and outside the city government through training, educational materials, “PSAs,” on new policies, their enactment, and their enforcement mechanisms.
  - Unaffordable housing/homelessness: National and local reports on homelessness have continuously shown a direct connection between homelessness and sexual exploitation and sex trafficking. Youth, women, Indigenous women, women of color, and LGBTQI folks have reported “voluntarily choosing” to sell sex/sexual activity in exchange for food, shelter, money, etc. Likewise, many immigrant workers without proper documentation continue to stay in hostile employment environments and employer-provided housing because of the lack of other housing options. Having access to affordable housing and supportive housing will help to prevent further exploitation and the continued victimization of the most marginalized people in Minneapolis.
  - Poverty/underemployment in Native American and communities of color: Native American communities and communities of color in Minnesota experience the highest rates of disparity including access to employment, making them one of the poorest groups of people in Minnesota. Latino, African- American, African, Asian, and Native American make up the low-wage earning groups in the state. Hence, poverty makes these groups particularly vulnerable to

exploitation. Enforcement of a minimum wage, which is higher than the state and federal minimum wage, will increase their wages, thereby leading to a better financial situation. Providing employment opportunities, prioritizing in hiring and retaining of staff from BIPOC communities, which has been identified as one of the goals of the city, will help lift people out of poverty, significantly reducing one of their vulnerabilities on which traffickers often preyed upon.

- Lack of coordination of services and response within the City enterprise and with providers outside of the City government: The City has been participating in Minnesota's endeavor to develop a holistic response to juvenile sexual exploitation. In 2013, the council resolution mandated the city to create a group to coordinate the city's efforts to end and prevent juvenile sexual exploitation and trafficking. However, because there was not a paid staff to coordinate and facilitate that group, the group did not have much direction and purpose. As a result, each department worked in isolation on its own sexual exploitation/sex trafficking response. For example: The Health Department, Business Licensing, Fire Department, Police Department, City Attorney's Office, Zoning, Inspections, and Environmental Health all have some process and mechanism to collect data on sexual exploitation/sex trafficking and labor exploitation and labor trafficking but do not have a formal process and protocol in place when it comes to communicating and sharing information and data. Lack of a shared database and streamlined communication and coordination could mean that the wrongdoers continued to conduct their businesses without any consequences. A data "dump" shared space or a system of sharing each department's data to the concerned internal stakeholders will help to strengthen the City's response, flagging the exploiters early on and holding them accountable.

Exploited and human trafficking victims are engaging with different City systems and sometimes all at the same time and with the County, state, and other service providers. So, it is very essential that the City create a protocol and process to efficiently coordinate and collaborate with the relevant departments within the City enterprise and outside with other government entities in order to provide better care and services. Often times, victims have expressed feeling overwhelmed navigating the multiple level of government systems without much help and support, which have left them with no choice than to return to their exploiters and/or traffickers.

- Additionally, minimal investment in programs and services, a mistrust of the governments, and policies and practices that have created barriers for the most vulnerable in the marginalized communities, in addition to the COVID -19 pandemic have also been identified as major challenges for the City.

## Framework for Action: Addressing Sex and Labor Trafficking and Exploitation in Minneapolis

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The City of Minneapolis is committed to ending human trafficking, sexual and labor exploitation, and to address the harms trafficking and exploitation cause. This Framework for Action (The Framework) sets out the next steps in establishing an effective city-wide response, and it could be used as a stand-alone document. The primary goals of The Framework and future work on human trafficking are that residents of Minneapolis have the resources, knowledge, and support that make them less vulnerable to both sex and labor trafficking and exploitation. In addition, City staff is trained to recognize and respond to human trafficking and are committed to working to end the labor and sexual exploitation that can give rise to trafficking.

The City of Minneapolis has made numerous commitments to racial equity, equity for Trans/GNC<sup>xlii</sup> populations, immigrant communities, and others. Combating human trafficking is another component of those commitments. Though data on human trafficking is limited, it indicates that victims are more likely to be ethnic or racial minorities, immigrants, youth, people with physical or intellectual disabilities, or Trans/GNC individuals.<sup>xliii</sup> Traffickers target individuals who are vulnerable for a variety of factors: inability to earn an adequate standard of living, fear or mistrust of government agencies that could help victims, isolation or newness to the community, unfamiliarity with workplace or relationship norms, among others. The City's commitment to vulnerable or marginalized communities demands a commitment to ending human trafficking. The City's existing work on empowering and supporting vulnerable and marginalized communities provides an opportunity to effectively identify and respond to human trafficking situations.

There were other key themes, elaborated below, that surfaced from the engagements, over the course of this project. It is therefore highly recommended that the City invest in these themes and processes for the successful implementation of the recommendations.

- Community Partnership is Key
- Community Engagement
- Build on Current Achievements
- Training
- Referral Process
- Coordinated Response
- Special Funding and Rapid Response
- Policy Improvements
- Address the Gaps

### **Community Partnership is Key**

Partnership with trusted community organizations is a key foundation for anti-trafficking work. Survivors and victim advocates report that people trapped in trafficking situations are often mistrustful of or disconnected from government agencies due to the current and past practices which have caused

tremendous harm to survivors, many of whom are from BIPOC (Black, Indigenous, People of Color) communities, those living in poverty, Trans/GNC, and those with other vulnerabilities. Survivors do not know about City resources or programs that can help them. The money provided to service providers has been too little to have any real impact. Finally, survivors often do not feel safe contacting City staff to report their exploitation. Community organizations – including cultural groups, neighborhood organizations, faith communities, and workers’ rights centers - can serve as a bridge, providing education and outreach, connecting with potential victims, and helping them navigate a potentially confusing process. Funding is crucial to an effective partnership. Further, the City needs to proactively work to foster trust and show a commitment through intentional outreach, provide practical support, and leverage its political capital to secure funding from external sources whenever possible to fund essential services and programs to be delivered through partnership.

Leadership by people with lived experience<sup>xliv</sup> is another priority for anti-trafficking work. Interventions and responses can cause unintended harm or overlook the unique needs of highly vulnerable populations. People with lived experience can uncover these potential problems and unmet needs. Such leadership, integrated within different arms of the City, also builds trust that City staff and policies will respond appropriately to trafficking situations. These two priorities – *community partnership* and *leadership by those with lived experience* - are woven throughout The Framework.

### **Community Engagement**

Meaningful community engagement has been identified as the foundation to any future process in the implementation of The Framework. Minimum wage, sick and safe time, wage theft, and adult entertainment ordinances are considered as examples of excellent outcomes due to robust community engagement with the concerned stakeholders led by grassroots organizations. The Framework has been informed fully by a series of such engagements with internal and external stakeholders despite the pandemic, which forced us to be even more creative and strategic in our approach. The engagement process of Objective #5 serves as another model for future engagement on the implementation of The Framework. The Framework should also be considered a work-in-progress, so it can easily adapt to the changing trends and needs in the community and continue to receive feedback from stakeholders in the future.

Community stakeholders, in many different settings, often described their experience of engaging with the City as insincere, futile, and often mired in government bureaucracy that limited their ability to influence policy and see their ideas implemented. Community engagement requires a commitment throughout the City enterprise that the input and experiences of community members receive equal weight as the views of policy professionals in designing programming, and that successes as well as problems or challenges in implementing community recommendations be brought back to community stakeholders for further deliberation. The recommendations in Objective #5 came from one such process, which is why they are included as they were drafted by community participants, as a starting point for further work directly with those stakeholders.

### **Build on Current Achievements**

The City of Minneapolis has already accomplished several key steps over the course of the grant. Each of these steps offers a foundation upon which to build future policies and practices. Many of these accomplishments focus on labor trafficking. However, it is worth noting that the City's work to implement Minnesota's Safe Harbor for Sexually Exploited Youth Act and its subsequent No Wrong Door service delivery system helped to mobilize wider internal support for concrete actions. Massage ordinances, the Health Department's commissioned report on adult entertainers, and labor-related ordinances have established a solid foundation on which the more enhanced response should be built upon.

### **Training**

An effective City response requires that City staff be trained to recognize sex and labor trafficking and know how to respond when it is identified. In partnership with The Advocates for Human Rights, the Senior Advisor developed a City-specific training on identifying and responding to labor trafficking (found on the City's trafficking webpage). Two divisions have already received this training: Environmental Health and Labor Standards Enforcement. Other divisions have expressed interest in the training and will schedule it for the next year.

Although City staff have received training on sex trafficking prior to the implementation of the Pathways to Freedom initiative, stakeholders have identified a need for a new kind of training. A training on sex trafficking and sexual exploitation that is developed in consultation with survivors and those who might not identify as victim/survivors which will ensure that people are not criminalized regardless of whichever situation they identify with and to avoid any kind of profiling. In either labor and/or sex trafficking, City respondents first approach should always be focused on immediate harm and safety of a potential victim.

### **Referral Process**

When trafficking situations are identified, victims must be quickly connected to service providers for housing assistance, mental and physical health care, immigration assistance, and more. Helping traumatized individuals assess their needs and make decisions about their safety is a complex process requiring specialized training, something difficult for City staff to undertake directly. Instead, City staff will refer victims to advocates who can assist them. The Senior Advisor established Cornerstone General Crime Victim Services to be the referral source for labor trafficking victims. The existing Safe Harbor network of organizations already serves as a referral source for sex trafficking victims. A list of organizations that provide services for adult victims/survivors of sex trafficking and sexual exploitation and others who do not clearly fit into these victimizations can be found on the City's trafficking webpage.

### **Coordinated Response**

The City will continue to coordinate its anti-trafficking efforts through the Senior Advisor on Human Trafficking, which has been established as a permanent position. Having a single point of contact is a widely recommended best practice for responding to complex trafficking situations where many different City departments and outside organizations may be involved. The Senior Advisor will also re-

launch the Human Exploitation and Trafficking (HEAT) team, which will bring together staff from key City departments to regularly consult on outreach, cases, and next steps in implementing the Blueprint.

Likewise, it is equally important to collaborate and coordinate with external government agencies and stakeholders to strengthen Minnesota's existing response to human trafficking by advocating to incorporate labor trafficking and adult victims of sexual exploitation and resources to provide supportive services to victims/survivors.

### **Special Funding and Rapid Response**

There are significant gaps in the resources and services available to victims of sex and labor trafficking in the community, especially for key groups like labor trafficking victims, adult victims of sex trafficking, and members of cultural communities. The Senior Advisor piloted a program that filled one of those gaps by funding a leadership development program for young girls<sup>xlv</sup> at risk of trafficking, in the Cedar-Riverside neighborhood.

The Senior Advisor also distributed funds, by repurposing the Pathways to Freedom technical assistance dollars, as part of a rapid response to COVID, which has a disproportionate impact on those already at risk of trafficking. Recent research found that, "7 in 10 Black employees have filed unemployment claims during the COVID-19 pandemic, compared to a little more than 1 in 3 non-Hispanic White employees."<sup>xlvi</sup>The pandemic is a stark example of why there needs to be a proactive approach in dealing with such a crisis in order to avoid further victimization. However, it is recommended that existing models are appropriated instead of creating a new one to maximize efficiency.

### **Policy Improvements**

Over the course of the grant, the City of Minneapolis passed several ordinances that strengthen anti-trafficking efforts by reducing labor exploitation and expanding the oversight of potentially exploitative industries.

- Wage Theft ordinance
- Freelance Worker Protection ordinance
- Adult Entertainment Protection ordinance

The Framework provides additional opportunities for the development of new policies and specific areas for improvement in existing policies. Objective #5 particularly lays out key pieces in existing City policies and practices that continue to create barriers for survivors of commercial sexual exploitation who had/have contact with criminal justice systems and how dismantling these systematic barriers will offer new pathways to victims/survivors to reach their full potential, eliminate racial disparities, and thereby improve the environment and promote social well-being for all living in Minneapolis. This is **the vision of Minneapolis** actualized in the truest sense.



The conversation succeeding the death of George Floyd<sup>9</sup> around violence prevention and a new vision on community safety is yet another opportunity for victims/survivors to reframe “seeking justice” through healing, supported by needed services in lieu of a criminal path. It is therefore imperative that trafficking explicitly be included in that conversation as an area of opportunity rather than a hindrance to a reimagining of community safety.

### **Address the Gaps**

Despite the City’s numerous achievements, the City's efforts to address human trafficking continue to face significant challenges because of the elements outlined below. The Framework for Action provides clear objectives and activities to address these challenges:

- Lack of awareness on human trafficking– particularly, exploitation and labor trafficking
- Minimal focus on adult victims of sexual exploitation
- Lack of coordination of services and response within the city enterprise and with providers
- Lack of funding in services/programs
- Unaffordable housing/homelessness
- Poverty/underemployment/unemployment in BIPOC communities

The Framework for Action lays out the next steps of the process to transform the City of Minneapolis into a leader in the anti-trafficking field. The work is ongoing – policies, funding, and staffing still need to change to meet the needs of trafficking victims. In the recommendations below, key tactics have been identified for several departments based on their needs assessment and feedback received from the staff. For examples, providing funding to the **Civil Rights Department** to conduct outreach and education on rights of vulnerable communities, especially immigrants and Trans/GNC, and the survivors’ recommendations in Objective #5 recommends that the City of Minneapolis **Human Resources Department** update the background check processes and criteria to remove barriers to City-enterprise employment for survivors of sexual exploitation/prostitution.

Though much remains to be done, with leadership and commitment, the objectives laid out in this Framework can be met. Few municipalities have created a comprehensive response to sex and labor trafficking and exploitation. By continuing to fund and support this work, Minneapolis can serve as a model to others and can build a strong and safe community for all.

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<sup>9</sup> On May 2020, George Floyd, an African American man was killed by a Minneapolis Police Officer, that sparked an uprising in Minneapolis advancing the much needed conversation on community led safety strategies and violence prevention which has since then found a home in the Office of Violence Prevention, Minneapolis Health Department.

## Recommendations

Based on the opportunities and needs identified in conversations with city staff and community members, the blueprint proposes **five** key objectives:

1. *Strengthen and empower City residents to prevent human trafficking*
2. *Improve the City of Minneapolis' response to human trafficking*
3. *Ensure all relevant City of Minneapolis policies respond to and prevent human trafficking*
4. *Coordinate and partner with county and state government to strengthen Minnesota's response to human trafficking and exploitation*
5. *Adopt a comprehensive response to adult victims of sexual exploitation driven by survivors' input*

*Supporting each objective are foundational goals to undertake within 1-3 years, intermediate goals, with a timeline of 3-7 years, and long-term goals, which will require an ongoing commitment from the City beyond 7 years.*

### Objective 1: Strengthen and empower City residents to prevent sex and labor trafficking

Prevention is a crucial component to any response to human trafficking. Prevention includes immediate intervention that raise awareness of sex and labor trafficking, enforcement of laws to reduce impunity for individuals, entities, and industries that thrive on exploitation, and an ongoing commitment to reduce the vulnerability of city residents to trafficking.

***Foundational Goal 1.1: Raise awareness of sex and labor trafficking and how to find help for people experiencing exploitation.***

Activities:

- Identify trusted community partners, especially those that have strong relationships with Trans/GNC and immigrant communities
- Provide funding to community partners for conducting outreach and education
- Continue to strengthen and formalize a relationship with workers' rights centers
- Create a basic campaign (handouts, posters, flyers, restroom posters, etc.), in collaboration with community partners, on sex and labor trafficking in several languages
- Add human trafficking information to other outreach on related issues such as labor rights (Labor Standards Enforcement), violence prevention (Office of Violence Prevention), teen empowerment (Health Department), and immigrant rights (Office of Immigrant and Refugee Affairs)

- Fund Civil Rights Department to conduct outreach and education on rights of vulnerable communities, especially immigrants and Trans/GNC

***Foundational Goal 1.2: Enforce City protections for workers to eliminate impunity for exploitation.***

Activities:

- Invest in City resources for investigation of workplace violations
- Robustly enforce City ordinances relating to wages and conditions

***Long-term Goal 1.3: Meet basic needs of City residents to reduce vulnerability to human trafficking, such as affordable housing or access to employment.***

Activities:

- Provide City funding to ensure all residents can meet their basic needs, especially access to safe housing and stable employment (establish and advocate for policies and laws at the city, county, and state level to support these changes, access to legal services, including related to immigration<sup>xlvii</sup>)
- Leverage the City’s resources to secure housing primarily for vulnerable populations including Trans/GNC people
- In consultation with the survivor advisory board (see Objective 5), create a human trafficking impact analysis for City staff to use when evaluating policies and spending<sup>xlviii</sup>

**Objective 2: Improve the City of Minneapolis response to human trafficking**

City staff are already encountering sex and labor trafficking cases in the course of their work and identification will increase as more staff receive training. The city must ensure efforts are coordinated across departments and with outside partners, while also collecting information to evaluate the effectiveness of the response. Furthermore, over the course of the grant, the Senior Advisor on Human Trafficking established a referral process for labor trafficking cases identified by City staff.<sup>xlix</sup> The existing referral system through Safe Harbor, for sex trafficking and sexual exploitation cases, could be used upon discovery of sex trafficking and sexual exploitation by the City staff, and/or directed to the Senior Advisor for further consultation.

***Foundational Goal 2.1: Facilitate coordinated response between City departments.***

Activities:

- City systems and responses require leadership by people with lived experience. This leadership must reflect the diverse communities that experience trafficking and exploitation. People with

lived experience must be engaged both in the professional leadership and in other meaningful ways throughout the design, decision-making, implementation, and evaluation of the City's response. It is imperative that the city fund and include people with lived experience to lead the development and implementation of the City's response.

- Continue to retain the position of Senior Advisor who specializes in coordinating efforts to combat human trafficking in the City Coordinator's Office
- Engage the Senior Advisor to conduct regular needs assessments every 3-5 years to determine if the City's response is effectively meeting the needs of community members and of people experiencing trafficking and exploitation
- As the home to the United States' largest urban Native American community, the City must engage with tribal nations and indigenous communities in planning and implementation of the blueprint
- Require City departments to create formal SOPs (Standard Operating Procedures) on addressing human trafficking and to train all relevant staff on identifying and responding to human trafficking
- Formalize the HEAT (Human Exploitation and Anti-Trafficking) Task Force through the creation of MOUs (Memorandum of Understanding) for internal City departments
- Continue to foster communication between departments regarding trafficking cases through HEAT

***Foundational Goal 2.2: Train City staff to identify sex and labor trafficking and to refer victims to assistance.***

Activities:

- Develop a 30-minute training for all staff after hiring and make it mandatory for existing City staff to review as well
- Train frontline staff from business licensing, housing inspectors, environmental health, fire inspectors, tenant navigators, small business team, NCR, the Youth Congress Board and outreach team at Youth Coordinating Board
- Explore opportunities with CPED to provide training on labor trafficking and labor exploitation to Step Up participants
- Conduct 6-9 month follow up with departments that have already received training (Civil Rights and Environmental Health)
- Create a mechanism for evaluation and develop future trainings based on the evaluation results

***Foundational Goal 2.3: Formalize the referral process for trafficking survivors to access services and evaluate its effectiveness***

Activities:

- Incorporate referral process into trainings and departmental SOPs

- Keep a record of referrals while ensuring that information is kept in a confidential manner (especially as it relates to immigration status)

***Foundational Goal 2.4: Empower divisions and departments to identify how they can prevent and intervene as necessary to address human trafficking and assist survivors***

Activities:

- Strengthen existing tools (screening, inspections) to identify potential trafficking situations
- Cross-train division and departmental staff on intersecting issues, such as Complaint Investigation and Labor Standards Enforcement
- Create specific language within Civil Rights that defines addressing economic discrimination against Trans/GNC and immigrant individuals as prevention of human trafficking
- Require key divisions to identify and designate a staff person to collaborate with the Senior Advisor to implement, execute, and evaluate the blueprint and integrate it into their workplan
- Evaluate the progress of key divisions at implementing these recommendations

***Foundational Goal 2.5: Equip applicable departments to respond to sex and labor trafficking cases identified by or referred to City staff***

Activities:

- Fund staff positions so divisions have capacity to respond to human trafficking cases
- Connect potential trafficking victims to victim services through the designated referral process
- Alert the Senior Advisor to suspected or known labor or sex trafficking cases

***Intermediate Goal 2.6: Evaluate data on sex and labor trafficking cases identified by or referred to City staff and use the findings to improve the City's response***

Activities:

- Scrub the data on human trafficking cases to allow anonymous tracking of outcomes while preserving the confidentiality of victims
- Conduct case reviews to identify how cases were identified, and whether cases could have been identified any earlier
- Analyze, evaluate, and report findings to the City Council annually
- Consult the City's IT department to create a shared database to share and track violations of city codes, analyzing what types of violations signal human trafficking, in order to improve and strengthen the City's response

***Intermediate Goal 2.7: Secure and manage resources to fund community partners to provide missing services needed by survivors of trafficking and exploitation***

Activities:

- Establish a pot of funding, in the Office of Violence Prevention or City Coordinator's Office, for use in developing rapid response programs to trafficking situations
- Incorporate the topics of domestic violence, sexual violence, gun violence, gang violence, gang-involved youth, etc., in the Office of Violence Prevention programming
- Seek external funding to regrant to community organizations that fill gaps in the state and federal responses to trafficking: housing for labor trafficking victims, culturally specific, gender-responsive (especially for Trans/GNC people), and non-judgmental supportive and legal services for adult victims of commercial sexual exploitation, those with lived experience in transactional sex, sex trafficking, all victims of labor trafficking, older youth and adults, boys/men, and parenting survivors with their children

**Objective 3: Ensure all relevant City of Minneapolis policies respond to and prevent human trafficking**

Exploitation and human trafficking flourishes due to the existing social/economic inequalities and policies and practices that have marginalized certain groups of people. It is imperative that any new policy should undergo a thorough racial equity analysis and be vetted through rigorous community engagement processes. And, similarly, an inclusive space needs to be created to review and reform existing policies and practices that will advance the goal of preventing and ending human trafficking and exploitation.

***Foundational Goal 3.1: Foster participation and ensure the concerns of human trafficking survivors are fully incorporated into the City's new approach to community safety***

Activities:

- Hold focus groups specifically for sex and labor trafficking survivors as part of the Future of the Community Safety Workgroup, overseen by the Office of Violence Prevention
- Incorporate best practices on working with human trafficking victims into any proposed alternatives to policing<sup>1</sup>
- Create a system to route non-life-threatening calls related to sexual exploitation, mental health, homelessness, disability, etc. to a community-based resource group instead of 911
- Explore the possibility of expanding and strengthening existing resources, through additional investment, such as Safe Harbor regional navigators or Day One statewide hotline
- Develop educational material, in multiple languages and multi-media formats, to generate awareness on the alternative to the 911 system so people with the above-identified conditions/situations can avoid police involvement

- Law enforcement training needs to be inclusive of how to work with Trans/GNC, people living with intellectual and mental disabilities, and the Deaf, blind, DeafBlind, and hard of hearing communities on an ongoing basis
- End criminalization of those who identify as victim/survivors of commercial sexual exploitation
- End criminalization of people, especially Trans/GNC, with lived experience in transactional sex<sup>li</sup>
- Create a streamlined process within the Civil Rights Department to report the police abuse of adults involved in transactional sex<sup>lii</sup>
- End criminalization of homelessness, poverty, and mental health
- Work with the City Attorney’s Office to develop an innovative system, with programs and services, as an alternative to incarceration of adult victims of sexual exploitation

***Intermediate Goal 3.2: Review City policies for areas where they could be modified or strengthened to better prevent trafficking and support survivors***

Activities:

- Research best practices in municipal contracting to ensure no city contracts are awarded to companies with histories of labor trafficking and that contractors have effective anti-trafficking measures in place
- Develop permitting, inspections, and other policies to ensure commercial and residential building projects prevent trafficking
- Analyze City contracts and business licensing standards for the potential to incorporate anti-trafficking provisions
- Implement policies that reduce the vulnerability of LGBTQ people to exploitation and human trafficking (for example: increase in hiring of Trans/GNC people; install gender-inclusive bathrooms; collaborate with local businesses to create a Trans/GNC inclusive workplace, etc.)
- Increase the hiring of youth/people from BIPOC communities
- Advise the Neighborhood and Community Relations Department (NCR) to develop a policy on labor trafficking and specific programming to conduct outreach to cultural, immigrant, and refugee communities
- Work with the Transgender Equity Council to strengthen policies affecting Trans/GNC people. Specifically, adopt and take action on Transgender Equity Council 2021 and future recommendations
- Pass a “Good Samaritan”<sup>liii</sup> policy for those with lived experience to provide immunity when calling 911 to report life-threatening situations so they can fully avoid criminalization for prostitution or drug possession
- Amend City ordinances and policies to remove any references to prostitution
- Amend the City’s loitering ordinance so that it cannot be used to target people engaged in transactional sex.

- Enact an ordinance defining criminal history or prior convictions (prostitution for example) as a protected class so people with certain criminal records aren't barred from employment in the City

**Intermediate Goal 3.3: Create an emergency rapid response toolkit to prevent human trafficking during times of crisis such as natural disasters and future pandemic**

Activities:

- Identify key internal stakeholders
- Work with OEM (Office of Emergency Management) to develop a plan to mitigate harm caused by crisis leading to human trafficking and exploitation<sup>liv</sup>
- Research existing models and appropriate those whenever possible
- Coordinate with internal and external partners including government bodies to better plan, communicate, and quickly develop a plan of action
- Collaborate with victim service providers in developing a response including services, such as homelessness response during the COVID pandemic (Research what groups already exist working on such issues)

**Objective 4: Coordinate and partner with county and state government to strengthen Minnesota's response to human trafficking and exploitation**

Minnesota has a robust system to respond to sexual exploitation and human trafficking of youth through the statewide Safe Harbor service delivery system managed by the Minnesota Department of Health and some elements of it through the Department of Human Services. The Bureau of Criminal Apprehension's Human Trafficking Investigation Task Force provides expertise to investigate human trafficking in collaboration with law enforcement throughout the state. Likewise, Hennepin County has instituted its response through its "No Wrong Door" program resulting in an investment in services and providing direct care. It is, therefore, imperative for the City to continue to collaborate with these agencies in enhancing the existing system and expanding to include sexual exploitation of all people and labor trafficking.

**Long-term Goal 4.1: With the support of the City's Senior Advisor, assume a leadership role in anti-labor trafficking and exploitation efforts both within Minnesota and nationally**

Activities:

- Promote the City's labor ordinances as prevention tools at the national level
- Uplift the co-enforcement mechanism, such as with CTUL, as a strategic investment to end labor exploitation and trafficking



- In collaboration with the City Attorney’s Office and Labor Standards Enforcement, develop a training for City Attorneys on how to investigate violations of a city’s labor ordinances
- Facilitate coordination between the Hennepin County Attorney’s Office on labor exploitation and labor trafficking cases
- Collaborate with the City Attorney’s Office and the Minnesota Department of Health and other stakeholders to identify and implement recommendations from the Safe Harbor for All Strategic Planning Process (Objective #5)
- Find intersecting areas in the Missing and Murdered Indigenous Women (MMIW) report for implementation where applicable
- Collaborate with the Youth Coordinating Board’s Youth Congress to advocate for increasing the age for decriminalization to 24 to be consistent with Safe Harbor service eligibility
- Work with the Youth Coordinating Board to incorporate human trafficking and exploitation of children and youth in Child Friendly City, designated by UNICEF, implementation plan
- Explore areas of collaboration with Indigenous leaders and organizations for the successful implementation and execution of the MMIW mandates in Minneapolis
- Collaborate with the Minnesota Department of Health, Department of Human Services, Bureau of Criminal Apprehension’s Human Trafficking Task Force, and Youth Services Network (YSN) to expand and implement labor trafficking into the state’s Safe Harbor service delivery system
- Find areas of interest and opportunities for collaboration on issues related to exploitation and human trafficking with Attorney’s General Office, Minnesota Department of Labor and Industry, U.S Equal Employment Opportunity Commission and other national agencies focusing on human trafficking

***Long-term Goal 4.2: Partner with external stakeholders to develop and advance legislative priorities at the Capitol that will directly address human trafficking***

Activities:

- Advocate for state funding for housing for all as an effective trafficking prevention strategy
- Advocate for statewide massage licensing legislation that is survivor-led and developed in consultation with people with lived experience and members of cultural communities
- Funding for housing and supportive services for labor trafficking victims
- Work with Transgender Equity Council, Race and Equity Division and external stakeholders to strengthen legislation (housing, employment) protecting rights of Trans/GNC people
- Explore areas for collaboration with those working on statewide criminal justice reform (such as cash bail reform, post-conviction relief, driver’s license issues, juvenile justice reform, second chance reform, and declining to call ICE.)
- Explore areas to support reform efforts of the child welfare/foster care system to prevent exploitation and trafficking of children, majority from Indigenous communities, under the leadership of native and indigenous leaders in Minneapolis
- Advocating for health care access for all without regard to immigration status

**Objective 5: Adopt a comprehensive response to adult victims of sexual exploitation through survivors' input**

The existing system continues to create barriers for adult victims of sexual exploitation, specifically those who had prior contact and interaction with the criminal justice system on prostitution and other related charges, despite research pointing to the connection between sexual exploitation and trafficking, and how often survivors find themselves in both of these situations at different times in their victimization. With limited supportive services and care targeted for adult victims of sexual exploitation and a lack of a holistic, compassionate, and non-judgmental response, they continue to fall through the cracks and end up back in the hands of exploiters and traffickers who profit on their vulnerabilities – homelessness, addiction, mental health issues, disability, etc. Only by eliminating these barriers, inherently manifested in policies such as housing, employment, can we level the playing field for people from BIPOC (Black, Indigenous, People of Color) and immigrant communities who have been marginalized the most, but, unfortunately, have little access to resources and care they deserve. A municipal response to human trafficking and exploitation, in any form, is inauthentic and incomplete without a deeper engagement with those who are impacted most by its policies and practices; the recommendations below are a direct outcome of that process of a series of engagements with survivors who were victimized and re-victimized by multiple levels of government systems.

***Long-term Goal 5.1: Commit to hiring and employment for survivors at all levels where the City has influence, including creating specific positions internally for survivors within the City enterprise, removing barriers for hiring within the City enterprise, and encouraging businesses in partnership with the City to do the same.***

Activities:

- Update City of Minneapolis Background Check processes and criteria to remove barriers to City-enterprise employment for survivors
  - Update criminal background procedure to put a 3-year time limit on felonies as a disqualifying factor
  - Update criminal background procedure to remove shoplifting as a disqualifying factor
  - Update criminal background procedure to include a statement of hiring support for survivors of sexual exploitation. Explicitly name lived experience as a survivor of sexual exploitation as a consideration if a conviction directly relates to the position of employment sought
  - Update criminal background procedure to explicitly inform applicants of their options to challenge disqualification for survivors of sexual exploitation
- Create preferential hiring for survivors of sexual exploitation and people with lived experience in commercial sex
  - Craft statement of employment support to demonstrate commitment to hiring survivors, people with lived experience in commercial sex, and those with felonies. Include language on job descriptions and postings. Preferentially hire survivors at the

- City in the same way veterans and people of color are encouraged to apply and add explicit language that survivors of sexual exploitation are encouraged to apply
- Create an optional way for applicants to confidentially self-identify as a survivor of exploitation to allow for monitoring of hiring
  - Demonstrate valuing lived experience in accordance with other forms of professional credentialing. Commit to an ongoing hiring ratio of 1:1 to preferentially hire people with lived experience in commercial sex within the City enterprise, particularly in departments who interface with community or survivors
  - Create new positions to infuse survivor-leadership within the City enterprise system, honor expertise of lived experience, and ensure trauma-informed City system response, particularly in the following departments: City Attorney’s Office, Police, 911, 311, Health, Civil Rights, Neighborhood Community Relations, Office of Violence Prevention, and Regulatory Services (particular to housing and business inspections)
  - Review and update current existing positions to explicitly hire for lived experience including positions such as: Crime Prevention Specialists, Community Specialists, Community Relations Specialists, Community Navigators, Public Health Specialists, Rental Housing Liaisons, and Victim/Witness specialists. Survivors bring skills in engaging with residents in relational and trauma-informed ways and are uniquely equipped to identify and recognize the nuances of “red flags” in a situation that would be invaluable in these positions
- Encourage Minneapolis-based businesses to similarly hire people with prior convictions and remove barriers to employment
    - Review requirements for procurement and contracting; identify ways to incentivize contractors hired by the City to subcontract with survivors; eliminate barriers for survivors to pursue independent contracts with the City
    - In the same way, businesses get tax credits for hiring veterans or people with felonies, create parallel incentives specifically for businesses located within city limits to hire people with prior prostitution charges as a way of demonstrating a commitment to the employment and well-being of survivors in our City
  - Commit to continued efforts to make expungement accessible
    - In partnership with the Attorney General’s Office, increase outreach, waive fees, offer pro-bono legal support, and otherwise support survivors in accessing expungement.
    - In addition to conviction records, seal arrest records as well so they cannot be found during employment or housing searches

Through the Civil Rights Department, clarify survivors’ rights and process to report being unlawful denial of employment due to prior convictions, including expunged and sealed records

***Intermediate Goal 5.2: Create a survivor-led first response system in partnership with police response to potential trafficking victims along with the adoption of a non-arrest policy for people selling sex. Increase police accountability and accountability of City staff who purchase sex.***

Activities:

- Adopt a non-arrest policy for people selling sex

- Minneapolis Police Department should adopt a non-arrest policy for anyone who would otherwise be picked up for a prostitution charge. Follow model adopted by St. Paul Police
- Stop the practice of confiscating survivor belongings
- Commit to establishing MOUs and partnerships with organizations such as Breaking Free, the PRIDE program at the Family Partnership, The Link, and emergency housing providers for survivors of violence. Instead of arrests, in partnership with service providers offer resources or ride to detox
- Invest in the creation of a survivor-led response system
  - Fund efforts to create a survivor-led system response to public safety. Ensure this funding goes to community-based groups and individuals with direct lived experience in commercial sex
  - Fund and create a survivor-led street outreach team. Likewise, preferentially hire survivors for this initiative
  - Review and re-route calls related to street-based commercial sex exchange from a police response to a survivor-led street outreach team. If someone calls 911 to report solicitation, someone selling sex, or related issues (loitering, etc.), re-route that call to the survivor community response team that can go out and respond to that situation, offer services, and support survivors without law enforcement presence
  - Create a protocol for staff in other departments (i.e. Regulatory Services, Health, etc.) to engage the survivor-response team to respond to and advise on situations where trafficking or exploitation is suspected
  - Create a protocol for law enforcement and survivor-response team to jointly respond to calls where there is a threat of immediate violence. Once a scene is secure and the potential survivor is separated from potential aggressors, ensure the survivor-response team has the authority to respond to the potential survivor
  - Include process for special considerations for survivors without immigration status; route to City attorney and OIRA to provide immigration support and resources
- Increase Police accountability and accountability of City staff who purchase sex
  - Clarify how to report harmful, derogatory, or violent interactions with officers and City staff; how to report when police officers sexually assault someone
  - Hire a survivor to do outreach and increase community knowledge of survivors' rights when dealing with City officers
  - Increase employment penalties for City staff convicted of purchasing sex

***Foundational/Long-term Goal 5.3: Prioritize permanent housing for survivors. Through private-public partnerships and tax incentive models, prioritize the creation of scattered site housing for survivors, remove the current barriers to housing, and increase tenant know-your-rights education.***

Activities:

- Remove barriers to housing for survivors
- Create a program to waive or pay for housing application fees for survivors

- Remove requirements for driver’s license/state ID and social security number which poses an additional barrier for undocumented survivor
- Amend the Renter Protection Ordinance in the following ways:
  - Explicitly allow the option for potential tenants to provide landlords with a free credit report instead of paying for credit pull as part of the application fees
  - Re: Limits on screening for criminal history
    - Amend to include exceptions to felony convictions if applicant can demonstrate domestic violence, sexual violence or trafficking victimization
    - Amend to prohibit screening based on any misdemeanors (remove time limit qualifier)
  - Re: Limits on screening for rental history
    - Amend evictions time limit from three or more years to one or more years. (Limit to only include the last year of time.)
    - Explicitly allow exceptions for eviction due to domestic violence, sexual violence trafficking or related issues
    - Amend income requirement exceptions to include the ability to pay security deposit and first month rent. Waive requirement to demonstrate a pay stub
    - Explicitly include consistent attendance at a shelter, halfway house, hotel stay, or treatment programs as adequate demonstration of rental history if the person has stayed there for six months or longer
  - Add a new section to explicitly limit screening based on unlawful detainers. (i.e. cannot consider unlawful detainers where the judgment was entered three or more years from the date of application OR one year if the tenant has paid in full.)
- Increase housing availability for survivors
  - Explicitly include survivors of domestic violence, sexual violence and trafficking for priority in Section 8 housing
  - Invest in additional scattered site housing specific to survivors of sexual exploitation and human trafficking. Give tax credits or other forms of incentives to housing developers and nonprofit housing providers to secure units in mixed income housing for survivors— don’t require all survivors to live in one place. Ensure survivors have access to housing in various neighborhoods throughout the city instead of concentrating available housing
  - Invest in first time home-owners program specific to survivors of sexual exploitation and human trafficking
  - Investigate options to cap rental increases based on years of residence
- Better utilize City infrastructure to protect renters from exploitation
  - Create and advertise a hotline in multiple languages within the Civil Rights Department where someone can report if they are being barred from housing despite renter’s protection ordinance. Work with community partners to disseminate information through trusted organizations and community leaders
  - Create a position in the City to help tenants navigate the system who are experiencing exploitation or unsafe situations by their landlords, like a victim advocate to support the process within small claims court. Ensure current Tenant Navigators within the City have been trained by survivors; preferentially hire survivors for these positions. Ensure language accessibility and translation support is available

- Increase the amount of time in which a grievance can be reported so survivors can report housing discrimination after the fact
- Invest in efforts to educate the public and survivors about their housing rights and what they can do when their rights are being violated. Fund a *know your rights* campaign related to civil rights complaints in multiple languages and formats
- Include language that defines and describes solicitation by landlords, and who a renter can call if their landlord solicits them for sexual acts. Include language on what to do if a landlord is unjustly taking security deposits. Explicitly identify rights of a domestic violence or trafficking survivor (i.e. the right to leave in the next 24 hours; the right to flee without being charged.)
- Increase penalties for landlords who are exploiting or soliciting renters including revoking their licenses
- Require inclusion of this language in lease agreements and to be shared on a yearly basis; require this language to be displayed in public spaces within a rental complex with four or more units; ensure dissemination and availability in multiple languages and formats
- Improve City standards for clean dwellings in low-income places; improve rental regulation to ensure clean, safe, rental units for low-income residents
- Prioritize survivors of color for positions related to educating residents on their rights, staffing helplines, and compliance checks of landlords
- Train all housing and business inspectors on signs of sexual exploitation; ensure training is led and developed by survivors
- Develop a protocol for business and housing inspectors to mandatory report concerns of suspected trafficking to survivor-response team in partnership with survivors. (i.e. A mandatory internal report in response to too many mattresses, mattresses in uninhabitable places such as garages, etc.) Include in follow-up protocol disclosure to survivor-led service agency for survivor-led wellness checks

***Intermediate Goal 5.4: Invest funding in community-driven violence prevention and healing services specific to sexual exploitation.***

Activities:

- Explicitly fund sexual exploitation prevention efforts
  - Integrate sexual exploitation as a priority within current violence prevention funding and efforts
  - Create survivor-specific positions within the Office of Violence Prevention to lead, design and implement prevention efforts
- Fully invest in holistic wraparound services for survivors
  - Commit to investment in the following components for survivor services:
    - Fund wrap-around survivor-led peer support plus enhanced services for adult survivors. Commit funding to an organization like “Breaking Free” to replicate services in Minneapolis or commit to funding new survivor-led nonprofits or

- social enterprises to provide direct services from a peer to peer lens in Minneapolis
    - Invest in substance abuse treatment. Offer more support for substance abuse for survivors. Understand the unique experiences of survivors who are using substances to numb trauma
    - Prioritize the immediacy of treatment when someone is ready. Update 211 process to increase access to a live person; eliminate wait times for Rule 25s and treatment
  - Invest in mental health services that are culturally specific and understands the complex trauma survivors have experienced: childhood sexual abuse, generational trauma, historical trauma
  - Invest in financial services for survivors including access to loans, financial education, and pathways to build entrepreneurial skills to support survivors in becoming independent consultants, launching small businesses, and non-profits
  - Invest in legal services including immigration legal support services, expungement support, etc.
- Ensure future funding is driven by survivors
  - Actively seek out and engage survivors in the community in ongoing discussions on funding priorities
  - Include a requirement for survivor-leadership in Request for Proposal language for related funding. Prioritize funding to survivor-led organizations, groups, and independent survivor consultants. Provide technical assistance to independent survivor consultants throughout the contract period for successful implementation of the project
  - Include survivors in budgeting, financial, and RFP selection discussions related to services for survivors, as well as determining evaluation and accountability of money distributed
  - Establish a survivor board or commission to direct this work and provide ongoing accountability

***Foundational Goal 5.5: Review adult entertainment ordinance to prioritize protections for sexually exploited people.***

Activities:

- Increase training and emphasis on sexual exploitation within the current adult entertainment ordinance
  - Amend the current adult entertainment ordinance in the following ways:
    - Require mandatory training to performers about trafficking, exploitation, know your rights and who to call if someone thinks exploitation is occurring
    - Include this information in performer contracts
    - Require mandatory staff training of adult entertainment business employees for sexual exploitation bystander intervention training (i.e. how to recognize trafficking behaviors) and who to call if someone thinks exploitation is occurring

- Require *know your rights* information and who to call if there are suspicions of exploitation to be posted in the back area of adult entertainment businesses  
Ensure hotline numbers and information is available in multiple languages and formats
  - Amend to require businesses to report how they are adopting anti-trafficking policies
- Contract with or hire survivors to lead these trainings and ensure compliance
- Set aside a portion of taxes or cover charge from adult entertainment business to allocate towards services for survivors

***Foundational Goal 5.6: Demonstrate City-enterprise wide commitment to supporting survivors through systemic training and language review.***

Activities:

- Name commitment to supporting survivors through the adoption of survivor-specific language
  - Craft a statement declaring a commitment to support survivor-led system change  
Include acknowledgment of systematic racism as it relates to City policies and practices related to survivors of sexual exploitation
  - Review city codes and remove the word prostitution
- Review and address practices and procedures in each department that continue to cause harm to survivors of color
  - By department and in partnership with a paid survivor consultant, review processes and procedures that continue to cause harm to survivors of color. Consider where City staff are unnecessarily contributing to the removal of parental rights from parents who are survivors or separating survivors from their children. Consider where trauma-informed and healing-centered processes would improve how the City engages with community members
- Train City staff on how to partner with survivors in responding to sexual exploitation
  - Contract with survivors to train City staff in knowing what to look for, how to intervene and respond to survivors; how to partner with survivor-consultants in crafting system responses. Schedule trainings at minimum once every two years, so that information is refreshed, and new department staff are onboarded



## Closing

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Local government has a unique opportunity to prevent and end human trafficking and exploitation by implementing a comprehensive, holistic plan in its internal operations and service delivery where applicable. Oftentimes, due to a lack of a clear and a comprehensive plan, human trafficking victims have fallen through the cracks within the systems, and they continue to cycle in and out of these systems without the much-needed help they need and deserve to exit the exploitative situations they find themselves involved.

Although the City of Minneapolis began its anti-trafficking initiative as early as 2010 through the City Attorney's Office and the Minneapolis Police Department, the focus remained narrow – sex trafficking and sexual exploitation of juveniles as well as how to address it – relying heavily on intervention and criminal justice approaches. While it is crucial to have law enforcement as an essential partner in finding safety and justice for victims, many times this approach alone has re-victimized survivors, especially Trans/GNC, and from BIPOC and immigrant communities. Also, there is limited scope for law enforcement to address prevention. Any plan to address human trafficking and exploitation should not only incorporate strategies for intervention but also incorporate prevention tactics. The plan must identify root causes of trafficking, an assessment of how might the city be contributing to human trafficking and exploitation, how different departments and divisions within the government might be interacting with potential human trafficking victims/survivors, and what role each of them – public health, business licensing, housing, labor standards enforcement, complaint investigation, immigration, etc. – can play in preventing and ending human trafficking and exploitation. Moreover, there is growing evidence that a comprehensive, cross-departmental, multi-disciplinary approach will allow cities to better address the root causes of trafficking, such as homelessness, addiction, economic vulnerability, xenophobia, and LGBTQ discrimination.

The Pathways to Freedom Grant Blueprint, *A Holistic Response to Human Trafficking and Exploitation: A Framework for Action*, is a comprehensive guide that offers an assessment of the City's work, a historical analysis, and a framework to move forward. The implementation of the "Framework for Action" will ensure the development of robust infrastructures, through new policies and reforming of existing policies; incorporation of best practices; strong enforcement of ordinances; and investment in programs and services. These all combined will help victims/survivors, especially from the marginalized communities, to find safety; heal, seek justice on their terms, and be productive residents of Minneapolis. The City of Minneapolis is very well-suited to do just that because of its well-established infrastructures which should be tapped into for further implementation of the blueprint and can serve as an example for other cities.

## Acknowledgment/Consultation

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This report would not have been possible without the generous support of Humanity United and NoVo Foundation through their partnership, Pathways to Freedom Challenge Grant. Thank you to Mayor Jacob Frey, the City Council, former City Attorney Susan Segal, the City Coordinator, and the deputy City Coordinators for ensuring that necessary support was provided through the completion of the project and providing ongoing funding to advance the City's anti-trafficking work.

This report is an outcome of a truly collaborative process in terms of gathering data, consulting on the project, and drafting the report. Madeline Lohman, Senior Researcher at The Advocates for Human Rights (AHR), provided technical guidance and advice on labor trafficking and labor exploitation. Throughout the grant period, Caroline Palmer at Safe Harbor Program, Minnesota Department of Health, Dr. Lauren Martin at University of Minnesota-Twin Cities, Katy Eagle at Mending the Sacred Hoop, Lorena Pinto and Mikki Mariotti at The Family Partnership, Terri Forliti at Breaking Free, Patina Park (former Executive Director) and Joy Friedman at MIWRC, Amanda Koonjbeharry at Citizens League, Beth Holger Ambrose, CeMarr Peterson, Stacy Schultz at The Link, Nigel Perrote at MNCASA, Colleen Schmitt at Cornerstone, Diana Chaman Salas at No Wrong Door, Hennepin County, and Michele Garnett McKenzie at AHR, and Em Vohs at OutFront, MN provided extensive consultation, invaluable feedback, and reviewed the content of the Blueprint. Deputy City Attorney, Mary Ellen Heng and City Attorney Paula Barrette not only provided critical feedback but also proofread the Blueprint. Wendy Hanson and Michael Stone, AmeriCorps Vistas, Promise Zone program assisted with the research. My sincere gratitude to these leaders/experts and many other community leaders/organizations who provided equally valuable feedback and stayed engaged throughout the project.

Most importantly, I would like to express my immense gratitude to survivor consultants Serenity Jones, Jamie Kahl, Janero Nettles, Jessica Smith, Chancellor Williams, and Symmieonna Williams and facilitators Lateesha Coleman and Katie Fritz who prepared the recommendations outlined in Objective #5. I would like to thank the Women's Foundation of Minnesota for partially funding that project.

Also, thank you to city leaders and Departments that participated, provided critical information, and were consulted at various points in the grant:

- Frank Reed, Brian Walsh, Kaela McConnon Diara - Civil Rights Department
- Commander Gio Veliz, Office Brandon Brugger, 3<sup>rd</sup> Precinct, Minneapolis Police Department
- Mary Ellen Heng, Kerri Kovalesky, Paula Barrette – City Attorney's Office
- Coral Garner, Sarah Schiele, Erin Sikkink, Sasha Cotton, Dan Huff (former environment health director), Ryan Krick, Cindy Weckwerth - Minneapolis Health Department
- Michelle Rivero, OIRA and Numan Shaikh, Mariano Espinoza, Michael Yang – NCR
- Michele Harvet, Linda Roberts, Amy Lingo - Business Licensing, CPED
- Kellie Jones, Demetrice Walker, Regulatory Services
- Track Trachtenberg, Race and Equity, City Coordinator's Office
- Members of Workplace Advisory Council
- Members of Transgender Equity Council

## Endnotes:

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