

FORT FAIRFIELD POLICE DEPARTMENT

Standard Operating Procedure

316 - HUMAN TRAFFICKING & COMMERCIAL SEXUAL EXPLOITATION INVESTIGATIONS

Effective Date	July 28, 2026
Legacy SOPs Replaced	New Policy
Review Date	July 28, 2027
Policy Classification	Operational
Authority	Chief of Police
Version	1.0

I. PURPOSE

The purpose of this policy is to establish procedures for identifying, investigating, and responding to incidents of suspected human trafficking and commercial sexual exploitation while promoting victim safety, effective investigations, and coordination with appropriate partner agencies.

II. POLICY

The agency shall investigate allegations of human trafficking and commercial sexual exploitation and shall employ victim-centered and trauma-informed practices whenever practical. Officers shall take reasonable steps to ensure victim safety, facilitate referrals to appropriate services, and coordinate with partner agencies as necessary.

Officers shall comply with this policy and applicable state and federal laws when investigating trafficking and exploitation offenses. Given that this is a statutorily mandated policy, failure to comply with this policy, as it applies to Maine Criminal Justice Academy Board of Trustees standards, may result in Board action against an officer's certification.

III. DEFINITIONS

Commercial Sex Act: Any sexual act for which anything of value is given to, promised to, or received by any person.

Commercial Sexual Exploitation: The misuse of a position of vulnerability, power imbalance, trust, authority, dependency, or coercive influence for sexual purposes, including the exchange of sexual activity for money, drugs, shelter, food, transportation, protection, or other things of value.

Coercion: The use of threats, intimidation, abuse of legal processes, withholding of necessities, debt manipulation, psychological pressure, or other conduct intended to compel a person to engage in conduct against their will.

Force: Physical restraint, assault, confinement, injury, or threatened physical harm used to compel conduct.

Fraud: Intentional deception, misrepresentation, false promises, or other dishonest conduct used to recruit, obtain, control, or exploit another person.

Human Trafficking: The exploitation of a person through force, fraud, or coercion for labor, services, or commercial sexual activity. Human trafficking includes both labor trafficking and sex trafficking.

Labor Trafficking: The recruitment, harboring, transportation, provision, or obtaining of a person for labor or services through force, fraud, or coercion for involuntary servitude, debt bondage, or slavery-like practices.

Minor: Any person under eighteen (18) years of age.

Multidisciplinary Team (MDT): A coordinated group of professionals that may include law enforcement, prosecutors, child protective services, medical providers, victim advocates, mental health professionals, educators, and other service providers working collaboratively to address trafficking and exploitation cases.

Sex Trafficking: The recruitment, harboring, transportation, provision, obtaining, patronizing, soliciting, or maintaining of a person for the purpose of a commercial sex act through force, fraud, or coercion, or any commercial sex act involving a person under eighteen years of age.

Trauma-Informed Approach: An approach that recognizes the effects of trauma on victims and seeks to minimize re-traumatization while promoting safety, trust, empowerment, and cooperation.

Victim-Centered Approach: An investigative and service-delivery approach that prioritizes the safety, dignity, privacy, rights, and well-being of victims while pursuing accountability for offenders.

Victim Service Provider: Any governmental, nonprofit, tribal, faith-based, or private organization that provides advocacy, shelter, counseling, medical care, legal assistance, crisis intervention, or related services to victims.

Vulnerable Adult: A person whose age, disability, dependency, cognitive impairment, mental condition, or other circumstance substantially limits the person's ability to protect themselves from exploitation or abuse.

IV. LEGAL AUTHORITY

This policy is promulgated pursuant to 25 M.R.S. § 2803-B and Maine Criminal Justice Academy Board of Trustees Policy 17. Relevant statutory authority includes, but is not limited to, 17-A M.R.S. §§ 852-855, 17-A M.R.S. § 259-B, and applicable provisions of Title 22 regarding child protection and mandatory reporting.

Officers shall remain familiar with applicable state and federal laws governing human trafficking, sex trafficking, commercial sexual exploitation, child protection, victim services, mandatory reporting, and related investigative responsibilities.

V. OPERATIONS

A. Recognition and Identification

Officers shall remain alert to indicators of human trafficking, sex trafficking, labor trafficking, and commercial sexual exploitation. Common indicators are contained in Appendix B. Officers shall evaluate the totality of circumstances and should not rely upon any single indicator when determining whether trafficking or exploitation may be occurring.

B. Initial Response

When an officer reasonably suspects trafficking or commercial sexual exploitation, the officer shall ensure safety, address immediate medical needs, separate potential victims from suspects when practical, preserve evidence, identify witnesses, and document relevant observations.

Officers shall notify a supervisor when trafficking or commercial sexual exploitation is suspected.

When safe and appropriate, officers should create a secure environment for interviews, support, and referral activity.

Victims may deny victimization, refuse assistance, or provide incomplete information. Such behavior shall not automatically preclude further investigation.

C. Victim Safety and Stabilization

Victim safety shall be a primary consideration in all investigations into trafficking and exploitation. Officers shall take reasonable steps to protect victims from further harm, facilitate access to services, and coordinate with appropriate service providers as soon as practical.

Individuals reasonably suspected of being victims of sex trafficking or commercial sexual exploitation should be treated as victims of crime and not primarily as offenders.

Victims shall be treated with dignity, respect, and professionalism regardless of their willingness to participate in an investigation or prosecution.

D. Victim-Centered and Trauma-Informed Practices

Officers shall employ victim-centered and trauma-informed practices whenever practical. Investigators shall recognize that trauma, fear, coercion, dependency, and other factors may affect victim behavior, cooperation, and disclosure.

Whenever practical, interviews should be conducted in a safe environment and in a manner that minimizes unnecessary trauma while maintaining investigative integrity.

E. Child Victims

Any minor reasonably believed to be involved in commercial sexual activity shall be treated as a potential victim of trafficking or commercial sexual exploitation.

Officers shall ensure the child's safety, comply with mandatory reporting requirements, and notify the Department of Health and Human Services when a child is reasonably believed to be a victim of trafficking, exploitation, abuse, or neglect.

Officers shall pursue all reasonable investigative efforts to identify offenders and protect victims.

F. Human Trafficking Investigations

Officers investigating suspected human trafficking shall conduct thorough and objective investigations to identify victims, offenders, facilitators, witnesses, and relevant evidence.

Investigators shall determine whether force, fraud, coercion, intimidation, manipulation, dependency, or other exploitative practices have been used to obtain labor, services, or commercial sexual activity.

Investigators shall attempt to identify additional victims, related criminal activity, and potential co-conspirators whenever practical.

Investigators shall also evaluate circumstances indicating possible labor trafficking, involuntary servitude, debt bondage, or related exploitation offenses.

As necessary, investigators shall coordinate with prosecutors and partner agencies possessing expertise in trafficking investigations.

G. Commercial Sexual Exploitation Investigations

Investigations involving commercial sexual exploitation shall focus on identifying victims, exploiters, facilitators, recruiters, purchasers, and any other people involved in or benefiting from the exploitation.

Officers shall recognize that people engaged in commercial sexual activity may themselves be victims of trafficking, coercion, exploitation, abuse, addiction, homelessness, or other vulnerabilities. Investigative decisions shall be based upon the totality of the circumstances.

H. Evidence Collection and Preservation

Officers shall identify, collect, preserve, and document evidence in accordance with agency procedures and applicable law.

Evidence may include physical, digital, financial, documentary, photographic, and testimonial evidence. Attention should be given to electronic communications, social media activity, financial transactions, lodging records, transportation records, and other evidence that may establish relationships among victims, offenders, facilitators, or criminal organizations.

When specialized forensic assistance is required, investigators should utilize appropriate local, state, or federal resources.

Evidence collection should include efforts to identify financial, digital, transportation, lodging, communication, and third-party facilitation evidence when relevant.

I. Interviews and Documentation

Interviews shall be conducted in a manner that promotes the collection of accurate information while minimizing unnecessary trauma to victims.

Whenever practical, interviews should be conducted in a safe and private environment. Investigators shall recognize that victims may disclose information gradually and that statements may evolve as safety and trust are established.

All interviews, investigative actions, referrals, notifications, and evidence collection activities shall be documented in accordance with agency reporting requirements.

J. Coordination with Service Providers

Officers shall facilitate referrals to appropriate victim service providers and community resources whenever practical.

Coordination may include advocacy organizations, medical providers, mental health professionals, child protection agencies, shelters, and other service providers capable of addressing the victim's immediate and long-term needs.

The willingness of a victim to participate in a criminal investigation shall not determine whether referrals or assistance are offered.

K. Multi-Agency Coordination

Human trafficking and commercial sexual exploitation investigations frequently involve multiple jurisdictions and specialized resources. Officers shall coordinate with appropriate local, county, state, federal, tribal, and community partners when such coordination will assist the investigation or enhance victim safety.

Investigators shall comply with applicable laws and agency procedures when sharing investigative information, while working within those laws and policies to facilitate a team approach.

L. Reporting Requirements

Officers shall document all trafficking and commercial sexual exploitation incidents, investigations, referrals, notifications, interviews, and enforcement actions in accordance with agency reporting procedures.

Reports shall accurately describe observations, investigative actions, evidence collected, referrals made, and coordination with partner agencies or service providers.

M. Training

The agency shall provide training designed to assist officers in recognizing indicators of human trafficking and commercial sexual exploitation and in conducting victim-centered and trauma-informed investigations.

Training should address victim identification, investigative techniques, evidence collection, applicable laws, available resources, and current trafficking trends.

N. Supervisory Responsibilities

Supervisors shall ensure that incidents involving suspected trafficking or commercial sexual exploitation receive appropriate review, investigation, documentation, and referral.

Supervisors shall monitor investigations for compliance with agency policy and provide guidance regarding investigative strategies, resource utilization, and partner-agency involvement.

O. Administrative Review

The Chief Executive Officer or designee shall periodically review trafficking and commercial sexual exploitation investigations, training, and related agency practices to identify trends, training needs, operational concerns, and opportunities for improvement.

Policy and training updates shall be made as necessary to reflect changes in law, investigative practices, and available resources.

APPENDIX A

BOT & MLEAP STANDARDS CROSSWALK

Human Trafficking & Commercial Sexual Exploitation Investigations Policy

Authority

25 M.R.S. § 2803-B – Law Enforcement Policies

BOT 17-1 – Investigation of Sex Trafficking or Commercial Sexual Exploitation Policy

BOT 17-5 – Mandatory Policy Compliance

Addressed in: Sections I, II, IV

Definitions

Authority

BOT 17-1 – Required Definitions

Addressed in: Section III

Recognition and Identification of Trafficking Indicators

Authority

BOT 17-2 – Officer Awareness of Human Trafficking and Commercial Sexual Exploitation Indicators

MLEAP 7.11 – Preliminary Investigations

Addressed in: Section V.A; Appendix B

Initial Response and Preliminary Investigation

Authority

BOT 17-2 – Initial Response Responsibilities

MLEAP 7.11 – Preliminary Investigations

Addressed in: Sections V.B, V.H, V.I; Appendix E

Victim Safety and Victim-Centered Response

Authority

BOT 17-4 – Victim Safety and Referral Procedures

Addressed in: Sections V.C, V.D, V.J; Appendix C; Appendix D

Child Victim Protection

Authority

BOT 17-4 – Protection of Child Victims and Mandatory Referrals

Title 22 M.R.S. – Child Protection and Mandatory Reporting

Addressed in: Section V.E

Human Trafficking Investigations

Authority

BOT 17-3 – Investigation Procedures

MLEAP 7.12 – Follow-Up Investigations

Addressed in: Section V.F

Commercial Sexual Exploitation Investigations

Authority

BOT 17-3 – Investigation Procedures

MLEAP 7.12 – Follow-Up Investigations

Addressed in: Section V.G

Evidence Collection and Preservation

Authority

BOT 17-3 – Investigation Procedures

MLEAP 7.11 – Preliminary Investigations

MLEAP 7.12 – Follow-Up Investigations

MLEAP 12.01 – Property and Evidence Control

Addressed in: Section V.H

Interviews, Documentation, and Records

Authority

BOT 17-3 – Investigation Procedures

MLEAP 5.01 – Privacy and Security of Records

Addressed in: Sections V.I, V.L

Multi-Agency Coordination

Authority

**BOT 17-3 – Coordination with Local, County, State, Federal, Tribal, and
Community Resources**

Addressed in: Sections V.J, V.K

Training

Authority

BOT 17-2 – Officer Awareness and Training

MLEAP 3.06 – In-Service Sworn Officer Training

Addressed in: Section V.M

Supervisory Responsibilities

Authority

BOT 17-5 – Agency Compliance and Supervisory Oversight

Addressed in: Section V.N

Administrative Review

Authority

BOT 17-5 – Agency Compliance and Policy Review

Addressed in: Section V.O

APPENDIX B – HUMAN TRAFFICKING AND COMMERCIAL SEXUAL EXPLOITATION INDICATORS

A person may be experiencing trafficking or exploitation when circumstances include:

- Fearful, anxious, submissive, or evasive behavior
- Evidence of physical abuse, intimidation, or control
- Lack of personal identification or control over personal documents
- Inability to explain living, employment, or travel arrangements
- Presence of a controlling companion who answers questions for the individual
- Signs of deprivation of food, sleep, medical care, or basic necessities
- Evidence of debt bondage or restricted freedom of movement
- Commercial sexual activity involving a minor
- Evidence of online advertising, recruitment, or exploitation

- Unexplained hotel, motel, transportation, or travel activity
- Indicators of labor exploitation or involuntary servitude

*No single indicator confirms trafficking or exploitation.

*Officers should evaluate the totality of the circumstances.

APPENDIX C – VICTIM-CENTERED AND TRAUMA-INFORMED INTERVIEW CONSIDERATIONS

Victims of trafficking or exploitation may:

- Deny victimization
- Fear retaliation against themselves or others
- Distrust law enforcement or government agencies
- Protect or remain loyal to traffickers
- Minimize abuse or exploitation
- Provide incomplete, inconsistent, or evolving information
- Delay disclosure of victimization
- Exhibit emotional responses that appear inconsistent with the circumstances

Investigators should:

- Conduct interviews in a safe and private environment whenever practical
- Allow victims sufficient time to provide information
- Minimize repetitive questioning
- Avoid unnecessarily confrontational interview techniques
- Utilize advocates, interpreters, CAC personnel, and other resources when appropriate
- Recognize that cooperation develops over time, as trust and safety are established

APPENDIX D – VICTIM REFERRAL RESOURCES

Officers should consider referral to the following entities, to the extent they are available:

- Department of Health and Human Services
- Child Advocacy Centers
- Sexual Assault Support Services
- Domestic Violence Resource Centers
- Medical Providers
- Mental Health Providers
- Substance Use Treatment Providers
- Housing and Shelter Programs
- Victim Advocacy Organizations
- National Human Trafficking Hotline (1-888-373-7888)

APPENDIX E – INITIAL RESPONSE GUIDE

When trafficking or commercial sexual exploitation is suspected, officers should:

- Ensure scene safety
- Separate potential victims from suspected offenders
- Address immediate medical needs
- Preserve evidence
- Identify witnesses
- Notify a supervisor
- Consider victim advocacy resources
- Evaluate the need for Department of Health and Human Services involvement
- Document observations and actions taken
- Initiate appropriate investigative follow-up