

# Schools & the Law: Hidden in Plain Sight

**How Schools Can Prevent and Identify Human Trafficking and Provide Trauma-Informed Responses to Child Survivors**

FSU Public Interest Law Center

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# Welcome!

- I am Clinical Professor *Paolo Annino*, and I direct the **FSU College of Law Human-Trafficking Exploitation Law Project (HELP)**. We are here to highlight the tremendous opportunities created by last year's legislature with the passage of the **Florida Human Trafficking Awareness Training Act**.
- With this legislation, Florida now leads the nation by requiring comprehensive human-trafficking identification and prevention training not only for **school children** but also for **all school personnel**. This landmark step strengthens our state's commitment to protecting vulnerable youth and empowering educators with the tools they need to identify and prevent exploitation.
- I want to recognize and thank HELP students **Lauren Evans** and **Tazara Weilhammer**, who played a central role in advocating for this bill throughout the legislative process. Their dedication and leadership were instrumental to this success. Thank you, Lauren and Taz!

# Why are We Talking about Trafficking of Children and Florida Schools?

- 100,000! (approx.) Florida children who are survivors of sex trafficking.
- 125,000! (approx.) Florida children who are survivors of labor trafficking.
- 250,000! (approx.) Total: children survivors of trafficking in Florida.

USF Lab Report 2025

# Is 250,000 a reliable approximation of trafficked children in Florida?

- Yes, it is the first comprehensive analysis: all the major state agencies.
- All previous reports were limited to one or two data sources.
- 2025 Florida Legislature OPPAGA Report found 379 children verified survivors of sex trafficking. This report is based primarily on DCF Abuse Hotline data.
- 2025 DCF Report on Human Trafficking found 2,254 children survivors of human trafficking. Again, this report is based primarily on DCF Abuse Hotline data.

# Why does Florida have a multitude of children survivors of trafficking?

- 18% Florida children poverty rate
- 97,762 homeless children in Florida School Districts

# Again, why so many trafficked children?

- Vulnerability.
- Vulnerability.
- Vulnerability.
- The common denominator of the 250,000 children who are survivors of trafficking is Vulnerability.
- Reduce Vulnerability, Reduce Trafficking.

# Who are Children Survivors of Trafficking?

- Exploited Children
- Exploited Children
- Exploited Children

# What is the Florida definition of Trafficking?

- Exploitation for sexual services and/or labor services.
- Sex trafficking and labor trafficking are different services, but many children are exploited for both services.
- The children are being trafficked for Commercial Gain.
- The trafficking process involves recruiting, transporting, harboring, obtaining, soliciting, providing, enticing—for the purpose of exploitation.
- Florida law does not require the elements of force, fraud or coercion to establish the trafficking of children

# What are some specific predictors for Trafficking of children?

- Compound Trauma
- Sexual Abuse
- Chronic Runaways

# What is the best way to reach children survivors?

- The Public Schools.
- The Public Schools.
- The Public Schools.
- 2,872,309 children are in the Florida Public School System.

# What can schools do to prevent trafficking of children from happening?

- Teach
- Teach
- Teach

# What to Teach?

- Teach what trafficking is and how children can avoid both on-line and in-person trafficking.
- Empower students with the coping skills & protocols to protect themselves.
- Teach human trafficking prevention not as an “extra burden” or “add-on” or as “something that has to be done because the Florida law requires it,” but as an essential life-skill that all children need to know in our time.

# What else can Schools do to Prevent the Trafficking of Children?

- Provide extra mentorship and guidance to children who are at a high risk of being trafficked: children with compound trauma, sexually abused children, homeless children, and chronic runaway children.

# What can Florida Schools do to help children who are survivors of trafficking?

- Call the DCF Abuse Hotline if you suspect a child in school is being trafficked.
- DCF ABUSE Hotline 1-800-962-2873 or report trafficking on-line
- <https://www.myflfamilies.com/services/abuse/abuse-hotline>
- Treat all children survivors with trauma informed-care while in school.

# Do school personnel have a legal duty to report trafficking?

- Yes!
- But many school personnel are not calling the Abuse Hotline.
- In 2024, only 7% of all trafficking reports came from school personnel.
- In contrast, 14% of all trafficking reports came from medical personnel. See Florida Legislature OPPAGA Report of 2025.

# Fla. Stat. § 1006.481

Fla. Stat. § 1006.481 is part of Florida's broader effort to make schools front-line responders to human trafficking by mandating staff training, building on earlier curriculum regulations, and creating statewide implementation systems.

# History of the Human Trafficking Awareness Training

- Fall 2019:
  - CAC students advocated to the Florida Board of Education and successfully passed the rule unanimously
- November 2019:
  - The rule went into effect
- 2020-2021
  - The rule was amended and implemented.
- 2025
  - House Bill 1237 was passed and became law on July 1, 2025.
    - This bill created Section 1006.481 of the Florida Statutes

# What § 1006.481 Requires:

- The statute requires every Florida public school to have and implement a training curriculum.
- The training must include:
  - The definition of human trafficking
  - Difference between sex trafficking and labor trafficking
  - How to identify students who may be victims
  - Guidance concerning the role employees have and
  - How to follow reporting protocol to:
    - Department of Children and Families (DCF), or
    - Florida Human Trafficking Hotline

# Who Must Be Trained

Every public school must ensure training for **anyone with contact with students**. This includes:

- Instructional personnel
- Administrative personnel
- Educational support personnel

Each employee must:

- Complete the training
- Sign an acknowledgement
- And the school must retain the record of this

*Format of Training? May be in person or online!*

# K-12 Curriculum Requirement

Following State Board of Education Rule 6A-1.094124:

Florida requires annual, age-appropriate, and developmentally suitable instruction related to child trafficking prevention and awareness for all K-12 students. The instruction must build skills progressively each year.

At Minimum:

- Recognition of signs of human trafficking
- Awareness of resources, including national, state, and local resources
- Prevention of abuse alcohol, nicotine, and drugs
- Information on the prevalence, nature, and strategies to reduce the risk of human trafficking
- Techniques to set healthy boundaries, and how to safely seek assistance, and
- Information on how social media and mobile device applications are used for human trafficking.

# Practical Effect in Schools

- The law:
  - Makes trafficking awareness training mandatory for schools
  - Integrates trafficking awareness into school safety and student welfare systems
  - Standardizes how schools:
    - Identify victims
    - Respond
    - Report suspected trafficking

# Student Performance Standards

**Rule 6A-1.094124 (3)(a)** Efficient and faithful teaching of the required topics must be consistent with the state academic standards and the Benchmarks for Excellent Student Thinking (B.E.S.T.) Standards.

The state academic standards for health education are found in **Fla. Admin. Code R. 6A-1.09401(h)**.

These standards and benchmarks were developed to align with the Health Education Required Instruction topics in Section 1003.42, Florida Statutes, and Rule 6A-1.094124 and include standards for education relating to prevention of child sexual abuse, exploitation, and human trafficking.

# Student Performance Standards By Grade

## *Fourth Grade*

4th graders should receive instruction that explains the negative impacts of the internet and social media such as human trafficking.

## *Fifth Grade*

The clarification does not include specific teaching about human trafficking. It does; however, emphasize the importance of forming healthy relationships, recognizing abusive behaviors, and developing appropriate responses to unwanted, unsafe, and threatening situations.

# Student Performance Standards by Grade **FSU**

## *Sixth Grade*

6th graders should receive instruction that includes recognizing and reporting signs of human trafficking and cyberbullying. 6th grade should receive instruction that includes human trafficking awareness and prevention.

## *Seventh Grade*

7th grade should receive instruction that includes human trafficking awareness and prevention.

# Student Performance Standards by Grade <sup>FSU</sup>

## *Eighth Grade*

- Instruction includes the relationship between bullying, dating violence, human trafficking and self-esteem.
- Instruction includes the compounding impact on mental health, such as depression, anxiety, loneliness, social isolation, and susceptibility to human trafficking.
- 8th graders should learn how to determine situations when specific professional health services or providers may be required, such as human trafficking.
- Students should be taught human trafficking awareness and prevention including how to identify human trafficking.

# Student Performance Standards by Grade

## *Ninth through Twelfth Grade*

9th-12th grade instruction should include prevention of human trafficking by maintaining personal security, including recognizing and reporting signs of human trafficking.

# Implementation

A Required Instruction Implementation Plan must be submitted electronically to <https://districts.flimadoption.org>

School district are required to file an Annual Report on July 1st of each year, and an Annual Implementation Plan by December 1st of each year

The Annual Implementation Plans are required to be posted on the school district's webpage. However, most plans on Florida School webpages are **outdated**.

20XX-20XX Implementation Plan			
This form serves as the reporting tool for school districts to report their implementation plan required by Section 1003.42, Florida Statutes. For each required instruction topic, districts will provide detailed information for ALL questions. For specific guidance, please refer to the implementation plan rubric.			
This form is due by July 1 of each year. All school districts are required to submit this form to <a href="https://districts.flimadoption.org">https://districts.flimadoption.org</a> .			
School District Name:			
	For each grade level, briefly describe the methods in which instruction will be delivered	Provide the professional qualifications of the instructional personnel delivering such instruction	Provide a brief description of the instructional materials used for such instruction
<i>Example (this example does not encompass all potential options, but should serve as a guide when completing this plan)</i>	Grade 1: classroom instruction Grade 5: annual assembly	Grade 1: certified teachers Grade 5: Department of Health employees	Grade 1: State adopted science curriculum (provide title) Grade 5: Department of Health provided resources
The history and content of the Declaration of Independence			
The history of the U.S. Constitution, the Bill of Rights and subsequent amendments			
The arguments in support of adopting our republican form of government, as they are embodied in most the most important of the Federalist Papers			
Flag Education			

# Implementation in Florida Public Schools

## *Leon County Public Schools*

Leon County provides health education concerning prevention of child sexual abuse, exploitation, and human trafficking to grades 6 through 12. Leon County health education learning modules include...

6th Grade	7th Grade	8th Grade	9th – 12th Grade
<ul style="list-style-type: none"> <li>-Puberty and adolescent development</li> <li>-Setting &amp; respecting boundaries</li> <li>-Healthy choices, affection</li> <li>-Reproduction</li> <li>-Importance of personal responsibility</li> </ul>	<ul style="list-style-type: none"> <li>-Reproduction</li> <li>-STDs/HIV Transmission, risky behaviors</li> <li>-Reducing the risk of teen pregnancy</li> <li>-Respecting Personal Boundaries; Dating Violence</li> </ul>	<ul style="list-style-type: none"> <li>-Healthy v. unhealthy relationships</li> <li>-Social media and relationships</li> <li>-Consent; sexual abuse, assault, &amp; harassment; relationship violence; <b>sex trafficking</b></li> <li>-STD/HIV prevention</li> </ul>	<ul style="list-style-type: none"> <li>-Healthy v. unhealthy relationships</li> <li>-Decision-making skills, boundaries, analyzing influences</li> <li>-STDs/HIV</li> </ul>

# Implementation in Florida Public Schools

## *Duval County Public Schools*

Per the published health education learning modules, Duval County Schools do not directly address human trafficking, not even among the high school students.

5th Grade	6th Grade	7th Grade	8th Grade	9th Grade
<ul style="list-style-type: none"> <li>• Puberty</li> <li>• Hygiene</li> <li>• Reproductive health</li> </ul>	<ul style="list-style-type: none"> <li>• Puberty</li> <li>• Reproduction</li> <li>• Abstinence</li> <li>• Setting Boundaries</li> </ul>	<ul style="list-style-type: none"> <li>• Reproduction</li> <li>• Pregnancy</li> <li>• STDs, STIs &amp; HIV/AIDS</li> </ul>	<ul style="list-style-type: none"> <li>• Puberty</li> <li>• Reproductio</li> <li>• STDs, STIs, and HIV/AIDS</li> <li>• Prevention Methods</li> </ul>	<ul style="list-style-type: none"> <li>• Puberty</li> <li>• Reproductive health</li> <li>• STIs</li> <li>• Responsible decision-making</li> </ul>

# Implementation in Florida Public Schools

## *Orange County Public Schools*

Orange county schools utilize the Monique Burr Foundation Teen Safety Matters curriculum for students 6 through 12 grade.

The curriculum covers human trafficking prevention and digital safety, including social media, substance abuse prevention, life skills, and coping strategies for mental and emotional wellness.



### **PROGRAM OVERVIEW**

MBF Teen Safety Matters® is a comprehensive, evidence-informed prevention education program for middle school students in grades 6 - 8 and high school students in grades 9 - 12. The program addresses emotional, physical, and digital safety, and teaches students and adults how to prevent, recognize, and respond appropriately to the four types of child abuse (physical, emotional, sexual, neglect), exploitation/trafficking, sexual assault, relationship abuse, bullying, cyberbullying, and digital dangers.

#### **BASED ON RESEARCH**

- » Comprehensive program teaches 5 Safety Rules following the recommendations of polyvictimization research to teach universal strategies that protect children and teens from all types of victimization
- » Uses active learning strategies and reinforcement materials
- » Age and developmentally appropriate

#### **PRACTICAL FOR SCHOOLS/ORGANIZATIONS**

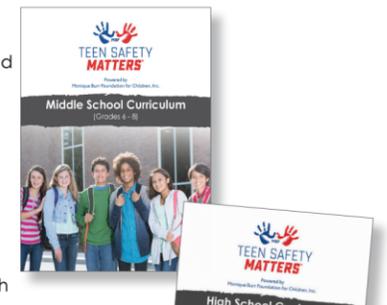
- » Easy to implement with just two 55-minute fun and engaging classroom lessons (can be presented in four shorter lessons)
- » Cost effective for schools and organizations partnering with schools
- » Uses a standardized curriculum with Facilitator Scripts and classroom PowerPoint presentations
- » Can be implemented by a variety of professionals (school counselors, teachers, health educators, nurses, coaches, local community partners, such as child advocacy centers, etc.
- » Certified Facilitators are trained prior to implementing program in classrooms via live or online training options

#### **HELPS SCHOOLS MEET STATUTE/POLICY REQUIREMENTS**

- » Helps schools meet many required bullying, child safety, and child abuse prevention requirements
- » Aligned with many Common Core Education Standards
- » Helps schools meet many required Health Instruction Standards
- » Aligned with American School Counselor Association's Mindsets and Behaviors for Student Success

#### **SUPPORTED BY EXPERTS & PARTNER ORGANIZATIONS**

- » Erin Merryn (Founder of Erin's Law)
- » David Finkelhor, Ph.D., Director, Crimes Against Children Research Center, University of New Hampshire



# Implementation in Florida Public Schools

## *Miami-Dade Public Schools*

The Miami Dade Student Progression Plan (2023-24) provides education in Child Abuse, Exploitation, Child Trafficking Prevention Education in every grade level K-12.

The history of the Holocaust (1933-1945)	Florida Statutes § 1003.42 Florida Statutes § 1000.05(7)	★	★	★	★	★	★
The history of the State (Florida)	Florida Statutes § 1003.42					★	
The history of the United States, including the period of discovery, early colonies, the War for independence, the Civil War, the expansion of the U.S. to its present boundaries, the world wars, and the civil rights movement to the present	Florida Statutes § 1003.42	★	★	★	★	★	★
Kindness to Animals	Florida Statutes § 1003.42				★	★	★
Pedestrian and Bicycle Safety (Injury Prevention and Safety)	Florida Statutes § 1003.42	★	★	★	★	★	★
To encourage patriotism, the sacrifices that veterans and Medal of Honor recipients have made in serving our country and protecting democratic values worldwide	Florida Statutes § 1003.42	★	★	★	★	★	★
The study of women's contribution to the United States	Florida Statutes § 1003.42	★	★	★	★	★	★
Substance Use and Abuse Prevention Education	Florida Statutes § 1003.42 and School Board Policy 5530	★	★	★	★	★	★
Child Abuse, Exploitation, Child Trafficking Prevention Education	Florida Statutes § 1003.42 School Board Policy 8462.01	★	★	★	★	★	★
Water safety W.H.A.L.E. Tales (Injury Prevention and Safety)	Florida Statutes § 1003.42	★	★	★	★	★	★
Digital Citizenship/Internet Safety	Florida Statutes § 1003.42 and School Board Policy 7540.03	★	★	★	★	★	★
Multicultural Education	School Board Policy 2225	★	★	★	★	★	★
Bullying and Harassment Prevention Education	Florida Statutes § 1006.147 and School Board Policy 5517.01	★	★	★	★	★	★
Sexting Prevention	School Board Policy 5136.02	★	★	★	★	★	★
Sun Safety Education	School Board Policy 5330.02	★	★	★	★	★	★

★ Social Sciences

★ Physical Education and Health Literacy

★ Science

★ Student Services

# Implementation of Training to Teachers

F.S. 1006.481 requires that the Department of Education provide free training to teachers.

The DOE has provided free training that can be found on their website: [www.fldoe.org/file/5596/nhtatfe.pdf](http://www.fldoe.org/file/5596/nhtatfe.pdf)



## Human Trafficking Awareness Training

Human Trafficking Awareness and Prevention for the Florida's Public School Personnel

Adapted from the Florida Department of Children and Families

# Implementation of Training to Teachers

School personnel, that have contact with students, must receive the training and submit to the school an acknowledgment of having received the training.

Schools are required to retain the acknowledgement of their training.

# Reintegrating Survivors into the School System

- What about survivors who haven't been in school due to trafficking?
  - Survivors identified by law enforcement agencies, DCF, etc.
- How do we help these students successfully reassimilate to the school environment?
- Survivors who have been out of school are often:
  - Not in their correct grade
  - Unfamiliar with school and classroom procedures
  - Unused to respecting authority figures
  - Distrustful of adults
- Unique circumstances – unique struggles – unique responses

# Survivors' Trauma Induced Behaviors

- Hypervigilance and anxiety
  - Conditioned to expect betrayal, exploitation, and harm
- Dissociation and Disconnection
  - PTSD, CPTSD, and dissociative disorders
- Emotional dysregulation
- Lack of impulse control
- Attentional difficulties
  - ADHD
- Negative self-concept
  - Depression
- Insecure attachment and relational trauma
  - Attachment disorders
  - Boundaries, isolation, recognizing emotional cues

<https://2021-2025.state.gov/the-impact-of-trauma-on-child-trafficking-survivors/>

# Disciplinary Action and Vulnerability

- What happens when trauma manifests as behavioral issues?
- Setting realistic expectations for survivors that don't know how to be students
  - When negative feedback reinforces negative self-concept
  - Negative feedback can be much more impactful than positive feedback
- Consistent negative feedback and formal disciplinary actions can increase vulnerability:
  - Retraumatization
  - Returning to their traffickers

# Schools, Trauma, and Discipline Approaches

- Example of a "School Relationship Agreement:"

Students Treating Staff	Students Treating Students
<b>Follow procedures</b>	Respect personal space
<b>Communicate</b> , with respect, <b>when there is an issue with following procedures</b>	Keep private things private
Be accountable	Maintain safety at school
<b>Be coachable</b>	<b>Seek staff to resolve peer-to-peer conflict</b>

- Broken agreement = disciplinary action
- What we are seeing: administrative responses that do not take the survivors' trauma into account

# Trauma Informed Response Overview

- A *trauma-informed approach* is a strengths-based service delivery approach grounded in understanding and responding to the impact of trauma that emphasizes physical, psychological, and emotional safety for survivors to rebuild a sense of control and empowerment.
- Shifts from asking “What’s wrong with you?” to “What’s happened to you and how can I help?”

<https://humantrafficking.umich.edu/education/trauma-informed-care/>

1

## Realizing

Realizing the widespread prevalence of trauma and understanding paths for recovery.

2

## Recognizing

Recognizing how trauma affects all individuals involved with the program, organization, or system (including within its own workforce).

3

## Respond

Respond by fully integrating knowledge about trauma into policies, procedures, and practices.

4

## Resist

Seek to actively resist re-traumatization.

# Trauma Informed Response in Schools

1. Train staff on trauma informed practices (TIP)
2. Use TIP across all aspects of schooling
3. Be aware of triggers
4. Give students a safe space to share and express their feelings
5. Help students develop a “growth” mindset
6. Build relationships
7. Show compassion and meet students where they are
8. Take care of yourself!
9. Use restorative practices that minimize punitive discipline

“Seeing an abused child through the lens of their traumatic experiences, as opposed to only their symptoms or behaviors, allows for effective interventions and competent trauma-informed care. “



<https://www.nea.org/professional-excellence/student-engagement/tools-tips/trauma-informed-practices>

# 504 Plans

- Section 504 is a civil rights law that assures that students with disabilities have educational opportunities and benefits equal to those provided to students without disabilities.
  - A formal plan for how a school will remove barriers so a student with a disability can learn alongside peers in general education. Doesn't include specially designed instruction (like IEPs)
  - IEPs come from The Individuals with Disabilities Education Act, a special education law
- To qualify, a student must have a physical or mental impairment that substantially limits one or more major life activities.
  - PTSD, ADHD, Depression, Anxiety, Pre-existing disabilities
  - For IEPs a student must meet the requirements for one or more of the 13 disability categories listed in IDEA
    - Autism, Early Childhood Developmental Delay, Emotional Impairment, Specific Learning Disability

# 504 Plans

- Recipient school districts must establish standards and procedures for initial evaluations and periodic re-evaluations of students who need or are believed to need special education and/or related services because of disability. The Section 504 regulatory provision at 34 C.F.R. 104.35(b) requires school districts to individually evaluate a student before classifying the student as having a disability or providing the student with special education.
  - Making classroom observations, interviewing parents and teachers, conducting standardized testing, considering medical records and diagnoses
- Caregiver consent is necessary
- Generally, a 504 plan is reviewed each year and reevaluation takes place every three years- but this varies by states

# 504 Plans: Accommodation Examples

- Frequent breaks to regroup after symptomatic behavior
  - Sensory activities
  - Noise-cancelling headphones
  - Designated safe place for self-regulation
- Extended time for tests, homework
- Consistent routines
- Safe adult mentor/aid
- Tutoring
- Visual Schedule
- No seclusion or restraint in discipline
  - Time-ins versus Time-outs

# 504 Plans: Discipline Policies and Procedures

- Non-Discriminatory Discipline:
  - Section 504 prohibits schools from implementing disciplinary measures that treat students with disabilities more harshly.
  - Policies must be fair, consistent, and consider the unique needs and circumstances of each student
- Manifestation Determination
  - Before implementing a significant change in placement (e.g., expulsion or suspension exceeding ten consecutive school days), schools must conduct a Manifestation Determination Review (MDR).
  - The MDR determines whether the misconduct was caused by, or directly and substantially related to, the student's disability or was a direct result of the school's failure to implement the student's 504 Plan. If so, the student cannot be subjected to the disciplinary action, and a change in educational placement can only occur if the parents agree or a hearing officer orders a change.

# 504 Plans: Discipline Policies and Procedures

- Individualized Discipline
  - Policies should accommodate the unique needs of students with disabilities. A one-size-fits-all approach to discipline can inadvertently discriminate against students whose disability-related behaviors might be misconstrued as misconduct.
- Procedural Safeguards
  - Parents have a right to be notified about disciplinary actions involving their child and to challenge those decisions if they believe they are discriminatory. Schools must provide these procedural safeguards in writing to ensure that parents are fully informed.

# Remarks from Dr. Michelle Gayle

Human Trafficking from the Leon County Schools Perspective

# Q&A and Closing Remarks

- Thank you for joining us!
- And thank you for your dedication to helping prevent human trafficking and to supporting survivors! Together we CAN make a difference.
- Feel free to reach out to any of us- we will put our emails in the chat.
- Also please share suggestions/experiences in the chat!