



**Services and Resources Committee of the
Statewide Council on Human Trafficking**

Interim Report

Department of Children and Families
Office of Child and Family Well-Being
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Services and Resources Committee of the Statewide Council on Human Trafficking

Interim report on the activities of the workgroup conducting a study regarding the regulations of adult safe houses.

Introduction

Thousands of individuals are trafficked every year in the United States. It has been estimated that up to 80 percent of survivors end up being re-victimized if they do not have a safe place to live. The Department of Children and Families (Department) is charged with licensing, certifying, and providing oversight and support to residential safe houses and safe foster homes for minor victims of sex trafficking. However, no standardized criteria/programming exist for residential programs that provide services for adult victims. As the state amplifies its efforts to support survivors and meet their needs, this was identified as an opportunity for enhanced regulation.

Chapter 2023-85, Laws of Florida (SB 1690) created section 402.88, Florida Statutes (F.S.). The new statute defines “Adult safe house” as a group residential facility that provides housing and care specifically for adult survivors of human trafficking. The law defines “Adult survivor of human trafficking” or “survivor” as an individual who has reached the age of 18 and who has been subjected to human trafficking as defined in section 787.06, F.S.

The lack of standards and oversight was discussed at the Services and Resources Committee of the Statewide Council on Human Trafficking meeting in November 2022. The decision was made to convene a work group (also known as “group”) comprised of various community partners and subject matter experts to survey current best practices related to adult human trafficking (HT) housing programs across the country.

The goal of the group was to gather and analyze available best practices and to recommend the standards and best practices for Florida’s housing programs serving adults of human trafficking while addressing the entire continuum of care. The group presented a brief report during the April 2023 meeting of the Services and Resources Committee.

As section 402.88, F.S., went into effect on July 1, 2023, the group continued its work aligning with the requirements specified in the law. The law states, in part, that:

- The Services and Resources Committee of the Statewide Council on Human Trafficking established under section 16.617, F.S., shall conduct a study and make recommendations regarding the regulation of adult safe houses.
- The committee shall submit an interim report regarding its activities and findings by October 1, 2023, to the Governor, the President of the Senate, and the Speaker of the House of Representatives.
- The committee shall submit a final report by December 31, 2023, to the Governor, the President of the Senate, and the Speaker of the House of Representatives.
- The committee shall survey operators of existing adult safe houses in the state to determine the following information regarding their operation:
 - The number of adult safe houses in Florida and the regions of the state where they are located.
 - The number of beds in adult safe houses and number of individuals served per year.

- The policies and criteria regarding which adult survivors of human trafficking may be served and the processes for intake and discharge, such as for how referrals are received.
- The amount of revenues supporting adult safe house operation and the sources of such funds including, but not limited to, the amount of state and federal funds received and the specific source of such state and federal funds.
- Services and supports provided to adult survivors of human trafficking directly by the adult safe house and services to which residents are referred, including while they are residing in the adult safe house and after transitioning out of the adult safe house.
- Training requirements for staff and volunteers.
- The nature of and mechanisms for coordination with law enforcement.
- Whether the adult safe houses allow children of adult survivors of human trafficking to also reside in the houses and, if so, policies regarding their residence in the house and services directly provided to them or to which they may be referred.
- Policies of adult safe houses that ensure that adult survivors of human trafficking are served in a respectful and trauma-informed manner.
- Challenges faced by adult safe houses in providing a safe and therapeutic environment that is trauma-informed and in providing services to residents and their children.
- Any accreditations held by adult safe houses, external standards promulgated by outside bodies which houses meet, or other industry certifications held by adult safe houses.
- Identification of ineffective or problematic practices in existing adult safe houses in the state and recommendations regarding minimum standards for regulation
- As part of the study, the committee shall also:
 - Identify and review standards recommended by national organizations or experts specializing in adult safe house service provision or shelter or housing for adult survivors of human trafficking.
 - Obtain recommendations from adult survivors of human trafficking and law enforcement agencies regarding regulation of adult safe houses.
 - The committee shall develop recommendations for regulation of adult safe houses in Florida based on, at a minimum, the information obtained by the committee under this section.

Survey of the current operators of existing adult safe houses.

1. The number of adult safe houses in Florida and the regions of the state where they are located. The number of beds in adult safe houses and number of individuals served per year.

By the end of July 2023, the workgroup had identified 15 providers that offer residential services to adult survivors of sex trafficking or sexual exploitation. The providers do not offer residential services to victims of labor trafficking, but some provide non-residential services or assistance with locating appropriate community partners who work with labor trafficking survivors. A few providers maintain more than one residential building within their programs to accommodate the changing needs of survivors as they progress through their journey. One provider has two distinct safe homes offering the same services in two different counties. In this report, this provider was counted twice (once for each location) for the purposes of better mapping the geographical distribution of available services.

Of the 15 providers that were contacted, 10 providers participated in the survey and the remaining five providers did not respond. Florida’s adult safe house programs reflect a variation in size and service delivery. Most safe houses provide long term care up to 24 months. One provider offers only short-term mental health and substance abuse stabilization specific to survivors of sex trafficking. Another provider has a limited number of beds available for crisis placement up to five days with subsequent referral for the most appropriate available housing. The locations, types of housing, capacity, and number of survivors served through the past reported year is captured in the Table 1 below.

Additionally, another 14 organizations were identified as providers of services to trafficking survivors among other types of clients served. These organizations are domestic violence shelters, post-incarceration programs, substance abuse recovery homes, and young adult emergency shelters.

Table 1. Adult Safe House Location, Bed Capacity, and Clients Served

Note: “Long term services” generally means services that are provided for up to 24 months.

Region	County	Survey Participation	Type of Services	Emergency beds	Long term beds	Clients served past year
Northwest	Santa Rosa	No				
Northeast	Duval	Yes	Long-term	0	13	17
Northeast	Alachua	Yes	Long-term	0	6	7
Suncoast	Hillsborough	No				
Suncoast	Manatee	Yes	Long-term	0	14	28
Suncoast	Hillsborough	Yes	Long-term	0	6	50
Suncoast	Hillsborough/Pinellas	Yes	Emergency/long-term	3	23	113
Central	Orange	Yes	Substance abuse/mental health crisis stabilization	10	0	116

Central	Orange/Seminole	No				
Central	Orange	Yes	Long-term	0	6	15
Central	Orange	Yes	Long-term	0	15	19
Central	Orange	Yes	Long-term	0	4	6
Southern	Miami-Dade	Yes	Long-term	0	6	5
Southern	Miami-Dade	No				
Southern	Miami-Dade	No				
Total				13	93	376

2. The policies and criteria regarding which adult survivors of human trafficking may be served and the processes for intake and discharge, such as for how referrals are received.

All providers reported that they have written policies and procedures describing who may be served by their program, including intake and discharge processes, and how the intakes are received.

- All serve adult women (age 18 and older) who are victims or survivors of sex trafficking.
- Intake is usually done in the form of an extended interview with the survivor and the adult safe home team to establish rapport, identify immediate and long-term needs, clarify expectations, and determine the survivor's goals upon entering the program.
- All providers accept and review referrals from local and federal law enforcement agencies, prison and jail social workers, local task force, hospitals, nation-wide network partners, and self-referred survivors.
- Two providers offering emergency short-term services accept immediate referrals from law enforcement.
- One long-term provider accepts emergency referrals from law enforcement if there is availability. The program does not ensure that the placement will turn into acceptance in the program but simply allows for a safe place for further determination of the needed level of care and the best options in accordance with the survivor's wishes and goals.
- Voluntary discharge includes planning for a safe place for the survivor to go, assistance with transportation, and referrals for continuing services if survivor chooses to do so. A few programs ask survivors to obtain employment and have savings prior to being considered for successful discharge. All discharge planning is highly individualized and reflects each survivor's unique goals and circumstances.
- Involuntary discharge reasons described in policies include violence toward staff or other residents, severe mental health conditions requiring specialized care, and continuous use of certain substances while residing in the program. Even in events of involuntary discharge, providers noted that efforts are made to identify the appropriate housing option for the survivor.

3. The revenues supporting adult safe house operation and the sources of such funds, including, but not limited to, the amount of state and federal funds received and the specific source of such state and federal funds.

- Providers did not disclose the amount of their revenue.
- Eight out of 10 responders rely only on private funding.
- Private funding includes fundraising events, in-kind and monetary donations from individuals, businesses, and faith-based organizations.

Table 2: Funding Source

Region	Private Funding	VOCA	Federal grants	State Funding	County Funding
Northeast	Yes	No	No	No	No
Northeast	Yes	Partial for \$54,000	No	In the past, not this past year	No
Suncoast	Yes	Yes	No	No	No
Suncoast	Yes	Yes	No	No	No
Suncoast	Yes	No	No	No	No
Central	No	No	No	No	Yes
Central	Yes	No	No	No	No
Central	Yes	No	No	No	No
Central	Yes	No	\$350,000 for three years	No	No
Southern	Yes	No	No	No	No

4. Services and supports provided to adult survivors of human trafficking directly by the adult safe house and services to which residents are referred, including while they are residing in the adult safe house and after transitioning out of the adult safe house.
- Summary of the most common services provided by adult safe houses with few variations. Designing a treatment plan with active participation by survivor based on their goals and circumstances.
 - Necessities such as clothing, toiletries, food, etc.
 - Comprehensive case management and advocacy, legal assistance referrals.
 - Individual and group counseling, trauma counseling, substance abuse counseling.
 - Mental health services, assistance with receiving medical and dental care, medication management.
 - Educational assistance, GED classes, and career exploration, job training and skills, resume writing and interviewing skills.
 - Life skills coaching, health and cooking classes, computer literacy.
 - Help with obtaining Driver's License
 - Assistance with the reunification process for those survivors who have their children in the Department's dependency system.
 - Bible study groups and religious services.
 - Discharge planning and provision of comprehensive list of available resources. Discharge plan includes identifying a safe place of residence and transportation assistance.
 - If provider offers non-residential services, survivors may continue to receive outreach services after they leave the program.
 - Referrals for organizations that provide services to human trafficking survivors to those survivors moving out of adult safe house's service area.

5. Training requirements for staff and volunteers.

Staff training is required at all programs. The pre-service training hours varies from provider to provider with 20 hours being the minimum number of hours to complete the training. Two programs reported on the job training with one program requiring shadowing of staff for at least 50 hours and another program offering two hours of on-the job training per day for the first six weeks. The maximum number of required pre-service training hours reported was 65-80 hours.

All providers reported that all volunteers receive training. The minimum reported volunteer training was one hour for volunteers who do not have any contact with survivors. For volunteers who have contact with survivors, the required training is four to five hours. One program requires all volunteers who have face-to-face contact with survivors to receive the same amount of training as staff.

6. The nature of and mechanisms for coordination with law enforcement.

Nine out of 10 providers reported that they have written policies for cooperation with law enforcement (LE) agencies. All providers accept and review referrals from LE. All programs reported that they provide a safe meeting space at their facilities or accompany survivors to meetings with LE officers. One program reported that they provide an advocate to be with the survivor during LE interviews when allowed. Many providers reported having good relationships with their local LE and working in coordination during sting operations. All providers stated that they do not relay any information disclosed to them by survivors to LE except in situations of immediate safety concerns. In all other non-emergency situations, providers encourage survivors to contact appropriate agencies themselves and ensure that survivors have all contact information for relevant agencies. If LE inquires about a particular resident of an adult safe house, most providers do not deny or confirm the survivor is a resident there but advises LE to contact the survivor through their legal representatives or victim advocates.

7. Whether the adult safe houses allow children of adult survivors of human trafficking to also reside in the houses and, if so, policies regarding their residence in the house and services directly provided to them or to which they may be referred.

Only one safe house out of the 10 that responded allows children of survivors to reside in the safe home. They have policies requiring children to be supervised by their parent, requiring the parent to cook all meals for their children, and not allowing children to cook for themselves or being anywhere near the stove. The policy calls for all child locks and all electrical outlet covers to be in place. Children are provided with their own therapy services and must be enrolled in school. If attending local school is not possible, children must be enrolled in virtual school with computers provided by the safe house for children to do virtual learning.

One safe home reported that they allowed a child to be with the survivor only once and for a very short time. One provider reported that they are currently working with a community partner organization willing to provide respite childcare for up to three months to care for survivor's children while their mother completes a program. This is a promising practice, but the time of respite may be insufficient as most programs last up to 24 months.

Most safe home providers reported that the majority of their residents have children in the dependency system and are in various stages of reunification. All providers reported that they provide support for survivors in their programs going through the reunification process.

8. Policies of adult safe houses that ensure that adult survivors of human trafficking are served in a respectful and trauma-informed manner.

All providers reported that they require a trauma-informed approach from their staff and volunteers. Some safe houses describe their approach to trauma-informed care in the employee handbooks, others include this in their mission statements, and some reflect the staff's ability to provide trauma-informed care in their performance evaluations and require staff to receive training on how to work with survivors impacted by trauma. All providers reported that required staff training include trauma-informed topics.

9. Challenges faced by adult safe houses in providing a safe and therapeutic environment that is trauma-informed and in providing services to residents and their children.

The most frequently reported challenge was obtaining necessary funding and the ability to retain staff and provide competitive salaries and benefits to employees. Another frequently mentioned challenge was the availability of high-quality mental health care providers familiar with the challenges and needs of survivors of human trafficking.

10. Any accreditations held by adult safe houses, external standards promulgated by outside bodies which houses meet, or other industry certifications held by adult safe houses.

One safe house is accredited by National Trafficking Sheltered Alliance and another one is currently in the process of receiving their accreditation.

One safe house has Safe House Project accreditation.

11. Identification of ineffective or problematic practices in existing adult safe houses in the state and recommendations regarding minimum standards for regulation.

The following harmful practices were reported and the recommendations for minimum standards for regulation are included in the below section titled "Workgroup Recommendations":

- The practice of requesting/asking survivors into telling their stories of being victims of human trafficking for fundraising events.
- No formalized monitoring of the standards
- Absence of an employee manual
- Not addressing the previous/childhood trauma

Identification and review of standards recommended by national organizations or experts specializing in adult safe house service provision or shelter or housing for adult survivors of human trafficking.

The workgroup reviewed materials from the following state and nationwide organizations:

- Florida Domestic Violence Certification Standards: https://www.myflfamilies.com/sites/default/files/2022-12/cfop_170-25_domestic_violence_center_certification_standards.pdf
- National Sexual Violence Resource Center: <https://www.nsvrc.org/sarts/protocols-and-guidelines>
- Institute for Shelter Care: <https://instituteforsheltercare.org/>

- National Trafficking Sheltered Alliance: <https://shelteredalliance.org/>
- Safe House Project: <https://safehouseproject.org/certification>
- North Carolina Human Trafficking Commission Standards of Service: [NCHTC- Standards-of-Service.pdf \(nccourts.gov\)](https://www.nccourts.gov/Portals/0/documents/standards-of-service.pdf)

The Department currently has standards for certifying Domestic Violence Centers and Shelters which can serve as an initial blueprint for the standards for the adult safe houses due to many similarities in the requirements for safety and security of the residents, need for well trained and trusted staff, and the understanding of the importance of the effect of trauma to the survivors and the crucial role trauma-informed care plays in the healing process.

The standards described by three documents specific to housing adult survivors of human trafficking (Safe House Project, National Trafficking Sheltered Alliance, and North Carolina Human Trafficking Commission Standards of Service) summarize best practices in the field of caring for survivors. With more of those practices in place, the higher level of certification a safe house can achieve. This practice allows for the continued development and implementation of new best practices even when a safe house achieves the minimum level required for initial certification. Both Safe House Project and National Trafficking Sheltered Alliance work with providers directly providing guidance, necessary trainings, and other needed assistance to achieve certification. Currently, three of Florida's safe houses for adults are certified through these national organizations and one is in the process of becoming certified.

Recommendations from adult survivors of human trafficking

Here are some key considerations and recommendations from Florida Survivor Leaders with lived experience:

- Residential housing standards and best practices for survivors of human trafficking are crucial in providing safe and supportive environments that help survivors heal and rebuild their lives.
- It's essential to customize these best practices to the specific needs and resources available in each community.
- Working with local experts, survivors, and service providers is crucial to developing effective residential housing standards and best practices for survivors of human trafficking.

1. Safety and Security:

- Ensure the privacy and confidentiality of survivors through secure locations, limited public access, and appropriate security measures.
- Conduct thorough background checks on staff, volunteers, and service providers to ensure the safety of survivors.
- Implement emergency response protocols and train staff on crisis intervention techniques including CPR, First aid, and medication management.
- Provide annual safety inspections of fire alarms, hurricane preparedness, pest control and any other safety measures.

2. Trauma-Informed and Responsive Care:

- Create a trauma-informed/responsive environment that acknowledges the unique experiences and needs of survivors.
- Train staff on trauma-informed/responsive principles to ensure that survivors are treated with empathy, understanding, and respect.
- Provide access to trauma-specific counseling services to address the psychological effects of trafficking. Both individual and group options and other therapeutic programming based on needs assessment.
- Require additional training on human trafficking continuing education, if children with parent, include online safety, boundaries, and safe people education.
- Register all advocates for the Florida Attorney General's victim advocate courses to receive privilege certification.

3. Housing Options:

- Offer various types of housing options based on survivors' needs and preferences such as communal residences, shared apartments, or independent housing units, faith-based or non-faith based, and options for those survivors with special needs.
- Ensure that the housing location is near essential services like healthcare facilities, employment opportunities, public transportation, and community support networks.

4. Individualized Case Management:

- Assign a dedicated case manager or advocate to each survivor to provide comprehensive support and connect survivors to necessary resources.
- Provide mentorship.
- Develop individualized case plans that address survivors' immediate safety, physical and mental health needs, education, employment, and long-term goals.
- Regularly review and update case plans to ensure they remain responsive to survivors' evolving needs.

5. Access to Basic Needs:

- Provide survivors with access to nutritious food, toiletries, clothing, and other necessities.
- Collaborate with local organizations and community resources to ensure survivors have access to healthcare including vision and dental care, legal services, educational opportunities, and employment support.
- Facilitate or refer survivors to community partners providing relevant services; educate the community partners about safe house's mission; provide appropriate training on human trafficking, trauma-informed and responsive care if needed; request background checks if community partner is working directly with residents.

6. Collaborative Partnerships:

- Establish partnerships with local service providers, law enforcement agencies, legal aid organizations, and healthcare providers to provide a comprehensive range of support services.
- Engage community stakeholders to foster a network of support and raise awareness about human trafficking to prevent future victimization.
- Join the local Anti-human trafficking Task Force, Coalition, or Commission.

7. Empowerment and Skills Development:

- Facilitate training programs, vocational skills development, financial literacy classes, and job placement assistance to enhance survivors' self-sufficiency and long-term economic stability.
- Offer educational opportunities, including GED programs, English language classes if applicable, and access to higher education, to promote survivors' personal and professional growth.
- Provide tutors for adult residents and children, if needed.

8. Continuum of Care:

- Ensure a seamless transition from residential housing to independent living by providing education, employment, and housing support after leaving the program.
- Provide a referral to another vetted residential program if the survivor chooses to leave the program early.
- Maintain ongoing follow-up and aftercare services to monitor survivors' progress and offer support even after leaving the residential program.
- Provide residents with an exit survey to evaluate and receive feedback on potential improvements and gaps to the program.

Recommendations from Law Enforcement Agencies

Collaboration between law enforcement and human trafficking safe houses is crucial in effectively combating human trafficking. Here are some suggestions and recommendations submitted by the representatives from the following agencies:

- Florida Department of Law Enforcement
- Homeland Security Investigations
- Metropolitan Bureau of Investigation
 - Orange County
 - Osceola County
 - Orlando Police Department
 - Kissimmee Police Department

1. Building Trust: Law enforcement agencies should take proactive measures to build trust and establish strong working relationships with human trafficking safe houses and vice-versa. This can involve regular communication, task force/coalition/commission meetings, and joint training and/or orientation sessions to increase understanding and cooperation.

2. Information Sharing: Establish protocols for the safe, secure, and confidential sharing of information between law enforcement and safe houses.

Possible ways to achieve this:

- Develop protocols that are sensitive to the needs of the survivors but still allow for timely intelligence gathering, especially in time-sensitive situations when the safety of other potential victims is at stake, or the perpetrator might leave the area.
- Adopt existing 'Child Sexual Abuse' protocol in which the 3-interview model is used allowing for the initial response information gathering, forensic interview and attorney interview for court.

3. Placements: Provide law enforcement with the safe house handbook, especially the eligibility criteria so referrals and/or placements are made appropriately.

4. Rapid Response for Placement Protocols: Develop protocols and strategies for rapid response placements to effectively address timely placement of a survivor. This requires clear communication channels and pre-established plans for coordination between law enforcement and safe houses to ensure effective and appropriate placement including transportation of residents and meeting location. Upon recovery, if available, an officer of the same gender as a victim conducts the interview.

5. Multidisciplinary Task Forces: Safehouses should join multidisciplinary task forces or coalitions. Such collaborative groups can help streamline the process of investigating and prosecuting human trafficking cases while providing holistic support to survivors.

6. Conduct Joint Operations: Plan and implement joint operations where law enforcement and safe house staff work together to prepare for the possibility of newly identified victims/survivors and ensure needed services are in place.

7. Regular Communication: Maintain regular communication and debriefing sessions between law enforcement and safe houses after operations or cases to share lessons learned, identify gaps, and improve future collaboration.

By implementing these collaborative strategies, law enforcement and human trafficking safe houses can work together more effectively to recover and identify victims, hold traffickers accountable, and provide the necessary support and care to survivors.

Work group recommendations

1. The certification credentials should clearly state and distinguish between the two types of housing provided below.
 - A best practice recommendation is that a provider should have approximately six (6) emergency beds available as often as possible.
 - Long-term transitional housing on the same campus to maximize administration and resources available to the survivors.
2. The certification credentials should list any special services or populations served by the providers, such as non-English speakers, minor children and other dependents of the survivor, therapy/companion animal policies, being able to serve survivors with various types of disabilities (wheel-chair accessible, staff trained in sign language or Braille), etc.
3. The certification credentials should allow for specialization such as survivors needing substance abuse treatment overlay services; mental health overlay services; or domestic violence services. The certification process should complement other licensing programs in the event a provider wishes to pursue dual licensure.

4. Each program should ensure that victims and survivors are not required to participate in fundraising efforts and that no survivors are forced or coerced into telling stories of their experiences.
5. Each program should ensure physical and emotional safety for residents and staff.
6. Each program should demonstrate efforts to hire, train, and retain professional staff to ensure the highest possible standards of care.
7. Each program should require criminal background checks of all employees.
8. Each program should implement pre-service training specific to working with survivors of human trafficking.
9. Each program should ensure that its organizational efforts adhere to local, state, and federal laws, administrative rules, and codes.
10. Each program should solicit and incorporate input from survivors of trafficking regarding organizational policies, protocols, program design, and governance.
11. Each program should have transparent financial practices that are open to required audits and board reviews.
12. Each program should always protect privacy and confidentiality of their residents through written policies describing the organization's approach to media inquiries, social media presence, fundraising policies, and use of survivors' names and images on the organization's website and in printed materials.

Conclusion:

Florida is home to several providers of residential services to adult victims and survivors of human trafficking with two different types of housing options. In summary, most providers offer long-term rehabilitative services that provide survivors with supportive housing and services for up to two years. The survivors entering those programs choose to do so and are actively working toward achieving self-sufficiency. The second type of housing offers emergency safe housing to victims in crisis, usually immediately after leaving a trafficking situation. These victims may need a mental health crisis response, substance detoxification, and/or medical attention. There is a growing need for more short-term housing, especially in the immediate aftermath of exiting a trafficking situation as well as for further integration and connection with substance use treatment services for survivors. The input provided across the human trafficking network to inform this report was extensive and informative, resulting in the initial certification recommendations.

The legislation passed to create certification standards for adult safe houses will solidify the state's efforts to protect survivors of human trafficking and to provide them with the highest level of care available. The certification process and associated policies will result in the standards, monitoring, and accountability mechanisms to ensure that the standards are delivered as intended by this legislation. Survivors and subject matter experts further support the need to ensure a formalized certification process is in place to provide safe and supportive options in Florida. The Department will continue collaboration with sister agencies, subject matter experts, and programs such as Substance Abuse and Mental Health as the final recommendations are developed and provided to the Council for consideration.