

Illinois Expands Human Trafficking Training Law to Include More Industries

Gov. J.B. Pritzker signed [Illinois Senate Bill 1422 \(SB 1422\)](#) on July 2, 2025, expanding the state's Human Trafficking Recognition Training Act (Act) to cover restaurants, lodging establishments and truck stops. The law sets mandatory employee training requirements for these employers and adds new enforcement mechanisms.

Training requirements took effect Jan. 1, 2026. The Illinois Department of Human Services (IDHS) will publish a state-developed model training curriculum by and begin formal enforcement on Oct. 1, 2026.

Background

Illinois first addressed employer-side human trafficking awareness through [Public Act 101-0018](#), signed into law in 2019. That legislation created the Lodging Services Human Trafficking Recognition Training Act (820 ILCS 95) and applied exclusively to hotels, motels, and casino hotels classified under North American Industry Classification System codes 721110 and 721120. Covered employees were those with recurring public contact, including front desk staff, housekeeping, bellhops and shuttle drivers.

Starting June 1, 2020, those establishments were required to provide at least 20 minutes of training within six months of hire and every two years thereafter. The IDHS was directed to publish a model curriculum by July 1, 2020, though employers were permitted to use their own or a third-party program provided it met the statute's content standards. The original Act contained neither a civil penalty structure nor an express mechanism for state or local authorities to enforce employer compliance.

Then, in 2022, an amendment attempted to extend the statute's reach to restaurants and truck stops, but the effort was incomplete. The Act's definition of a "covered employee" remained tied to persons "employed by a lodging establishment," leaving genuine ambiguity about whether stand-alone restaurants and truck stops with no affiliation to a hotel or motel were actually subject to the law.

New Rules

SB 1422 amended the Act to expand the employers covered, specify the training requirements and outline how the law will be enforced going forward. As part of that amendment, the law renames the Act the Human Trafficking Recognition Training Act and replaces all references to specific venue types throughout the

Highlights

Jan. 1, 2026

SB 1422 renamed the Act and extended mandatory human trafficking recognition training to restaurants, lodging establishments and truck stops.

Oct. 1, 2026

Enforcement authority of training requirements begins.

Illinois will publish a state-developed model training curriculum.

statute with the broader term “employer,” reflecting the intent to move away from an industry-specific framework.

Covered Employers

The law expressly names restaurants, lodging establishments and truck stops as covered employers. Under SB 1422, coverage is no longer contingent on any affiliation with a lodging establishment.

Training Requirements

Covered employers are required to provide each employee with at least 20 minutes of human trafficking recognition training within six months of hire, and again every two years as long as the employee remains with the company. The training must cover:

- The legal definitions of "human trafficking" and "commercial exploitation of children";
- Signs that an individual may be a trafficking victim;
- The difference between labor trafficking and sex trafficking; and
- Steps to take when trafficking is suspected.

Approved Training Programs

Employers have flexibility in how they meet the training requirement. Employers may:

- Develop an internal program;
- Contract with a third-party provider; or
- Use the model curriculum that the IDHS is required to publish by Oct. 1, 2026.

The state-provided curriculum, available by Oct. 1, 2026, is an option, not a mandate. Any program used, regardless of source, must satisfy the content requirements of the Act.

Enforcement

On Oct. 1, 2026, local governments and law enforcement agencies will gain express authority to monitor whether covered employers are meeting their training obligations. If a violation is found, the employer will receive written notice and have 30 days to correct it. If the violation goes uncorrected, the Illinois attorney general or the applicable state’s attorney may bring a civil action against the employer. Violations will be classified as business offenses, with fines of up to \$1,500 per offense.

Next Steps for Employers

Covered employers should ensure training is in place now and should review their training programs to make sure they are in compliance with the Act. Enforcement begins Oct. 1, 2026, when state and local authorities will gain authority to monitor compliance and pursue civil action for uncorrected violations. Employers who have not yet implemented a qualifying training program should either implement one or use the program provided by the state.
