



PROTOCOL: Anti-Sex Trafficking

IMPLEMENTATION DATE

January 31, 2022 – Interim Release
August 1, 2022 – Final Release

APPLICATION AND SCOPE

The *Policy/Program Memorandum 166 Keeping Students Safe: Policy Framework for School Board Anti-Sex Trafficking Protocols* (PPM166) sets a strong foundation for Ontario school boards to build local anti-sex trafficking protocols.

This protocol will support coordinated action by all community partners to prevent, identify and recognize sex trafficking and develop responses to facilitate early and appropriate intervention.

Welcoming and engaging school environments lead to positive student experiences, especially when families and communities are intentionally involved in the students' learning. Safe schools, both physically and psychologically, are a critical element to successfully nurturing positive student experiences.

Due to almost daily contact with students, teachers and other education staff are well placed to educate on prevention and promote healthy relationships, notice troubling changes in behaviour, and connect with students as caring adults. By training staff to recognize the signs of sex trafficking, they will be better equipped to identify the cues and safely intervene if they suspect a student is being trafficked or involved in trafficking. Education can also serve as a key factor in helping survivors of trafficking heal and rebuild their lives, helping to prevent re-victimization and resetting students on a healing trajectory towards positive outcomes.

DEFINITIONS

Sex trafficking: A form of sexual exploitation and is a crime under the Criminal Code of Canada. It can include recruiting, harbouring, transporting, obtaining or providing a person for the purpose of sex. It involves the use of force, physical or psychological coercion or deception. Most

individuals who are trafficked for the purpose of sexual exploitation are women and girls, but all people may be targeted.

Indigenous and racialized individuals are especially vulnerable to experiencing sex trafficking. The intersections of colonization, intergenerational trauma, systemic discrimination and barriers to accessing service compound, which increases the vulnerability of being targeted by traffickers for Indigenous women and girls – of whom comprise a disproportionate number of trafficked persons for the purpose of sexual exploitation, in Canada.

2SLGBTQQIA: Refers to two-spirit, lesbian, gay, bisexual, transgender, queer, questioning, intersex and asexual.

Anti-racism: A process, a systematic method of analysis, and a proactive course of action rooted in the recognition of the existence of racism, including systemic racism. Anti-racism actively seeks to identify, remove, prevent and mitigate racially inequitable outcomes and power imbalances between groups and change the structures that sustain inequities.

Cultural responsiveness: “Extends beyond language to include a much larger set of professional attitudes, knowledge, behaviours and practices, and organizational policies, standards and performance management mechanisms to ensure responsiveness to the diversity of [students] who walk through [schools'] doors”

Cultural safety: Refers to “an environment that is spiritually, socially and emotionally safe, as well as physically safe for people; where there is no assault challenge or denial of their identity, of who they are and what they need. It is about shared respect, shared meaning, shared knowledge and experience of learning together.”

Equity lens: Involves “strategically, intentionally and holistically examining the impact of an issue, policy or proposed solution on underserved and historically marginalized communities and population subgroups, with the goal of leveraging research findings to inform policy.”

Human rights-based approach: A “conceptual framework for the process of human development that is normatively based on international human rights standards and operationally directed to promoting and protecting human rights. It seeks to analyze inequalities which lie at the heart of development problems and redress discriminatory practices and unjust distributions of power that impede development progress.”

Survivor: Used to refer to an individual who has escaped a trafficking situation, whereas *victim* is used to refer to an individual who is in the process of being recruited or is being trafficked. The term survivor may also be used to refer to an adult with lived experience of being trafficking. This approach is used for clarity and not intended to label or define an individual's experience. Individuals who have experienced sex trafficking may prefer one term over another in order to describe their experiences. School board employees should confirm how an individual impacted by trafficking prefers to be referenced.

Tactics: Traffickers may use a range of tactics to target, recruit, manipulate and coerce victims. This can often involve a process of targeting an individual's vulnerabilities then luring, grooming, isolating, manipulating, controlling and exploiting a victim to then conduct sexual acts (for example, forcing a victim to have sex, to take images of child sexual abuse). Often, a victim may not be aware that exploitation is happening, and victims may be forced to recruit other victims.

Trauma-informed approaches: Are “policies and practices that recognize the connections between violence, trauma, negative health outcomes and behaviours. These approaches increase safety, control and resilience for people who are seeking services in relation to experiences of violence and/or have a history of experiencing violence.”

Victim: Used to refer to an individual who is in the process of being recruited or is being trafficked, whereas *survivor* is used to refer to an individual who has escaped a trafficking situation. The term victim is often used to refer to a child who has experienced sexual exploitation. This approach is used for clarity and not intended to label or define an individual's experience. Individuals who have experienced sex trafficking may prefer one term over another in order to describe their experiences. School board employees should confirm how an individual impacted by trafficking prefers to be referenced.

STATEMENT OF PRINCIPLES

A ROLE FOR PARENTS/GUARDIANS/CAREGIVERS

Parents, guardians and caregivers are key partners in the development, implementation and review of school board anti-sex trafficking protocols. Care must be given when reaching out to parents, families and caregivers to ensure they are safe adults prior to engaging with them on matters regarding the student/s. Outreach to Indigenous parents and guardians, as well as outreach to Black and racialized parents and guardians, should be trauma-informed and recognize historic and systemic barriers that may impact their participation. Every effort should also be made to reduce cultural and/or linguistic barriers when reaching out to parents, guardians and caregivers about this work.

FOSTER STUDENT VOICES

Students are at the centre of this work and should be involved in efforts to develop actions against sex trafficking. Invite student groups to participate and inform the design, development, delivery and implementation of anti-sex trafficking protocols. Recognize that students with lived experience are experts and, if willing and appropriately supported through trauma-informed approaches, could share their story and insights as part of efforts to build awareness and empower students.

BUILD MULTI-SECTORAL RELATIONSHIPS WITH COMMUNITY ORGANIZATIONS

Ongoing consultation and engagement with community groups/agencies that support members of the school community are essential to supporting anti-sex trafficking approaches that are responsive to diverse students and the needs of local school communities.

The NCDSB is working in partnership with the following community organizations and commits to working with other related agencies for guidance, support, and education materials. These agencies and organizations are listed in Appendix A: *Community Agencies and Organizations*.

INTERVENTIONS MUST BE SAFE

Caring adults and students within schools can promote a sense of student belonging, increase protective factors, help to reduce risk factors associated with sex trafficking, and support early intervention through identification and appropriate response, including connecting impacted persons to supportive services.

School board employees require comprehensive anti-sex trafficking training, so they are equipped to identify the signs of sex trafficking, safely respond to disclosures, be culturally relevant and responsive to diverse student populations, and support the immediate physical and emotional safety needs of students. Training must emphasize how to respond to immediate dangers and the need to avoid actions that will make an individual's situation worse or more unsafe.

BUILDS UP SCHOOL-BASED PREVENTION

This protocol will complement existing prevention efforts in schools, including the teaching of consent, healthy relationships and healthy sexuality. It is important for school staff to understand the historical and social context of sex trafficking and implement prevention strategies that are responsive to the needs of students and members of the local school community.

RESPECT CONFIDENTIALITY, PRIVACY AND INFORMED CONSENT

The development of procedures must respect confidentiality and ensure that the student fully understands how their information may be used or with whom it may be shared. It is key to develop referral relationships with community service organizations while adhering to applicable legal requirements, including those under the *Municipal Freedom of Information and Protection of Privacy Act*; the *Ontario Human Rights Code*; the *Accessibility for Ontarians with Disabilities Act, 2005*; the *Education Act*; and the *Child, Youth and Family Services Act, 2017*.

PROMOTE EQUITABLE AND CULTURALLY SAFE RESPONSES

The NCDSB supports a human rights-based, non-judgemental, culturally responsive, survivor-centered and trauma-informed approach to raising awareness, preventing, identifying and responding to sex trafficking.

PROCESS

1.0 STRATEGIES TO RAISE AWARENESS AND PREVENT SEX TRAFFICKING

- 1.1 This protocol and all related documentation will be publicly available and accessible on the NCDSB website.

- 1.2 The NCDSB acknowledges that the online security of its students and employees is a key consideration and a potential factor in human and sex trafficking. Various NCDSB policies are related to the awareness and prevention of sex trafficking. These include, but are not limited to, the following:
- E-19 Educational Excursions
 - E-26 Reporting Abuse
 - E-31 Volunteers in Schools
 - E-32 Equity and Inclusive Education
 - E-34 Safe Schools
 - I-2 Responsible Use of Information and Communication Technology
 - I-5 Website and Social Media
 - P-5 Criminal Background Checks
- 1.3 The NCDSB, through the Director of Education, will consult with its Catholic Parent Involvement Committee and/or school based Catholic School Councils to generate parent input and discuss how best to raise awareness regarding anti-sex trafficking education.
- 1.4 Awareness strategies may involve sending newsletters to families, providing information in student handbooks, displaying posters, hosting virtual and/or in-person information sessions, video resources, posting resources/information on the school board website or social media platforms. All such strategies will address the following issues:
- i) Cyber-safety;
 - ii) The signs that a student is being targeted, lured, groomed, trafficked or is trafficking another student/s;
 - iii) How to get help safely;
 - iv) How to report concerns to the school/school board;
 - v) How the school/school board will respond.
- 1.5 In collaboration with community resources and supports, the board will provide and/or make available a resource list for culturally-based, gender-based, trauma informed services.
- 1.6 Educators will integrate teaching of key concepts through the Ontario Curriculum, Religious Education and Family Life Programs that focus on such topics as healthy relationships, consent, mental health and well-being, coping skills, personal safety and online safety.

2.0 REPORTING PROCEDURES

- 2.1 Concerns can be brought forward directly to the school or school board via phone or email.

- 2.2 Anonymous concerns can be brought forward directly to the school or to the school board, though phone. Callers can block caller-identification when making an anonymous concern, to ensure anonymity. The Office of the Director of Education will receive anonymous email reports through the board website.
- 2.3 Concerns brought forward will be referred to the appropriate person or agency.
- 2.4 Schools will be encouraged to create a space in the school (bulletin board) with support services and contact information that is accessible and visible to students, staff, and visitors. Schools can also post anonymous support hotline numbers in various places through the school (for example, bathroom stalls).

3.0 RESPONSE PROCEDURES

- 3.1 Response procedures will be followed to respond to situations where a student:
 - i) May be at risk of or is being sex trafficked;
 - ii) May be targeting, luring, grooming or recruiting children and youth for the purpose of sex trafficking;
 - iii) Is returning to school after they have been trafficked or involved in trafficking others.
- 3.2 At all times, employee responses will protect the safety and well-being of the child or youth.
- 3.3 It is very common that information relating to human trafficking would constitute a call to a child protection agency. In cases where a staff member becomes aware of child abuse, they have a duty to report this information to the appropriate agency (in accordance with NCDSB Policy E-26 and NCDSB Administrative Procedure APE 013 *Reporting Abuse*).
- 3.4 An employee will inform the principal of the school of all related concerns.
- 3.5 In collaboration with the Mental Health Lead, the principal of the school will take steps to ensure the immediate safety of the students.
- 3.6 The Mental Health Lead will serve as the point person for accessing support and will help set the steps for intervention.
- 3.7 Principals will receive additional resources and supports that detail response procedures for cases where students are at risk of, or have experienced sex trafficking.

- 3.8 In cases where a student who is known to have experienced sex trafficking (including the recruiting of others), is returning to an NCDSB school and/or coming for the first time, transition meetings will be held prior to the student's arrival. The transition meeting will include at minimum:
- i) All relevant school staff;
 - ii) Service agencies, as applicable;
 - iii) Family members;
 - iv) Child protection agency (in cases where the student is in care);
 - v) First Nations community representatives, where appropriate.
- 3.9 Transition meetings will be used as a means of ensuring the student arrives at school with the proper planning and supports in place.
- 3.10 Persons who are involved in receiving a report of human trafficking should keep accurate and factual documentation. It should be noted that these documented notes and records can and might, at some later date, be subject to review by a court during criminal or civil proceedings. Therefore, documentation should be handwritten and stored in a secure location.
- 3.11 Documentation should:
- i) be factual and include dates and times;
 - ii) be brief and to the point;
 - iii) be confined to information seen or heard by the employee or volunteer;
 - iv) include questions that were asked of the student.
- 3.12 All records of documentation, either as noted above or by another preferred method of documentation by the employee or volunteer, shall be retained in a secure location in the office of the Principal. This will help to ensure the safekeeping and security of all such documentation relating to the safety and well-being of the students.
- 3.13 No such records of documentation will ever be stored in the child's Ontario Student Record.

4.0 TRAINING FOR SCHOOL BOARD EMPLOYEES

- 4.1 All employees of the NCDSB will receive ongoing training and access to information related to sex trafficking, in order to educate employees about the importance of their roles in ensuring student safety. Topics include, but are not limited to:
- i) Key definitions, common misconceptions and myths about sex trafficking, including tactics used for online luring, grooming and recruitment;
 - ii) Learning about human rights-based approaches to combatting sex trafficking, including the application of an equity lens, anti-racism, a

gender-based lens, trauma-informed approaches and Indigenous cultural competencies;

- iii) Information on protective factors and prevention-focussed supports and resources;
- iv) Information on risk factors and signs that a student is at risk, being lured, groomed, or trafficked;
- v) Signs that a student is involved in luring, grooming, or trafficking others;
- vi) Review of response procedures, including duty to report, how to handle disclosures to support student safety, how to support students impacted by sex trafficking and how to share information to ensure privacy and confidentiality;
- vii) Supports available to students and affected staff, including culturally responsive supports;
- viii) Review the roles and responsibilities of school board employees in raising awareness, identifying and responding to sex trafficking.

4.2 Employees will engage in the training requirements at least one time annually, and a tracking system will be used to ensure the completion of required training.

4.3 Employees will be warned in advance about the content of the training, in case it serves as a trigger for those employee who have a related traumatic experience.

5.0 MEASURING SUCCESS: ACCOUNTABILITY AND EVALUATION

5.1 Following the first year, the NCDSB may be required to report to the Ministry of Education, upon the ministry's request, on its activities to achieve the expectations outlined in this policy framework.

5.2 The Ministry of Education will collaborate with school boards, as well as anti-human trafficking partners, to develop a performance measurement framework. This framework will monitor the effectiveness of training (for example, whether staff feel they are more aware and more able to safely identify and intervene in situations where a student is suspected of being trafficked or trafficking) and whether the protocols respond to the needs of students.

5.3 The NCDSB commits to working with community partners and local agencies as part of the evaluation process, to determine how the protocol is helping children and youth in care to avoid or exit human trafficking.

RESOURCES

Policy/Program Memorandum 166 Keeping Students Safe: Policy Framework for School Board Anti-Sex Trafficking Protocols (PPM166)

Municipal Freedom of Information and Protection of Privacy Act

Ontario Human Rights Code

Accessibility for Ontarians with Disabilities Act, 2005

Education Act

Child, Youth and Family Services Act, 2017

<https://www.canadianhumantraffickinghotline.ca/>

NCDSB Policy E-26 Reporting Abuse

NCDSB Procedure APE 013 Reporting Abuse

REVIEW CYCLE

This protocol will be reviewed on a three-year cycle, and in accordance with the provisions noted above.

Director of Education: Tricia Stefanic Weltz

Date: August 1, 2022

Appendix A: Community Agencies and Organizations

PROTOCOL: Anti-Sex Trafficking

If there is **immediate danger** or if you **suspect** someone is being trafficked, **call 911** or your **local police service**.

If you or someone you know is in **need of support** or you want to **report a potential trafficking concern** call the Canadian [human trafficking hotline: 1-833-900-1010](https://www.rcmp-grc.gc.ca/1-833-900-1010).

ADDITIONAL RESOURCES OF SUPPORT

Victim Services – Locations victimservicesontario.ca

North East Region - except the James Bay (Moosonee)

Timmins & District Victim Services

- Main office: 705-360-8700
- 24/7 immediate help: 1-877-264-4208

Coastal site - Moosonee

Mushkegowuk Victim Services (Victim Quick Response Program)

- Main office: 705-336-0752
- 24/7 After Hours Emergency Line: 1-705-336-8607

Cochrane-Smooth Rock Falls Victim Services

- Main office: 705-272-2598
- 24/7 immediate help: 1-877-264-4208

Kapuskasing-Hearst Victim Services

- 1-705-335-8468
- 24/7 immediate help: 1-877-264-4208

Victim Services of Temiskaming & District

- Kirkland Lake office: 705-568-2154
- New Liskeard office: 705-647-0096
- 24/7 immediate help: 1-705-642-5192 (note: this is the cell # of the on-call staff, this number can be shared with staff with the sole purpose of supporting a victim, but it's not to be used to share as a public crisis line number for students and parents)
- For general public, they can call 911 or 1-888-310-1122 to connect to OPP who can then connect them to victim services

ADDITIONAL RESOURCES OF SUPPORT (continued)

Ontario Native Women's Association

- 1-800-667-0816

Northeastern Ontario Family and Children's Services

- Cochrane District 705-360-7100 or 1-800-665-7743 (toll free)
- Temiskaming District 1-866-229-5437

Payukotayno James & Hudson Bay Family Services

- 705-336-2229
- 1-888-298-2916