



Administrative Procedure: Keeping Students Safe: Anti-Sex Trafficking Protocol

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1.0 Purpose

- 1.1 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.
- 1.2 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
- 1.3 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.
- 1.4 Due to almost daily contact with students, principals, 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.

2.0 Definitions

- 2.1 **Sex trafficking** is 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 can involve the use of force, physical or psychological coercion or deception. Women and girls are most often the targets of sexual exploitation but anyone who is vulnerable might be at risk of becoming a victim of sexual exploitation or trafficking.

- 2.2 **2SLGBTQIA+:** Refers to two-spirit, lesbian, gay, bisexual, transgender, queer, questioning, intersex and asexual.
- 2.3 **Anti-racism:** Anti-racism is 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.
- 2.4 **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.”
- 2.5 **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.”
- 2.6 **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.”
- 2.7 **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.”
- 2.8 **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 staff should confirm how an individual impacted by trafficking prefers to be referenced.
- 2.9 **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.

- 2.10 **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.”
- 2.11 **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 staff should confirm how an individual impacted by trafficking prefers to be referenced.

3.0 Who Is At Risk

- 3.1 Traffickers identify a person’s vulnerabilities and then target those vulnerabilities to gain trust and form a bond. As every person has vulnerabilities, any person can be at risk of being a victim of trafficking. However, there are specific risk factors that may make an individual more vulnerable:
- 3.1.1 Females, especially children, youth and 2SLGBTQQIA+
 - 3.1.2 Indigenous, racialized women and children;
 - 3.1.3 Individuals with a history of physical or sexual abuse;
 - 3.1.4 Children and youth in care or transitioning out of care;
 - 3.1.5 Homeless and marginalized youth;
 - 3.1.6 Children and youth with disabilities;
 - 3.1.7 Individuals with low self esteem, who are isolated or lack a sense of belonging

4.0 Statement of Principles

- 4.1 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 students. 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.

5.0 Foster Student Voices

- 5.1 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.

6.0 Build Multi-Sectoral Relationships with Community Organisations

- 6.1 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.
- 6.2 The Superior North Catholic District School Board values the input and expertise of the community agencies that may be involved in this ongoing work:
 - 6.2.1 Diocese of Thunder Bay
 - 6.2.2 Hearst-Moosonee Diocese
 - 6.2.3 Thunder Bay Anti-Human Trafficking Coalition
 - 6.2.4 Ontario Provincial Police

- 6.2.4 Anishinabek Police Services (APS)
- 6.2.5 Nishnawbe Aski Police Service (NAPS)
- 6.2.6 Children's Aid Society
- 6.2.7 Dilico Anishinabek Family Care
- 6.2.8 Tikinagan Child and Family Services
- 6.2.9 NOSP (North of Superior Counseling Services)
- 6.2.10 Marjorie House
- 6.2.11 Northwestern Ontario Women's Centre
- 6.2.12 Ontario Native Women's Association
- 6.2.13 Sexual Abuse Centre Thunder Bay
- 6.2.14 Sex Trafficking Hotline

7.0 Interventions Must Be Safe

- 7.1 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.
- 7.2 School board staff 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.

8.0 Build Up School-Based Prevention

- 8.1 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. This is a particular

concern for Indigenous populations, who continue to experience the effect of colonization, which has resulted in a disproportionate number of Indigenous women and children being trafficked both historically and currently.

9.0 Respect Confidentiality, Privacy and Informed Consent

- 9.1 Confidentiality must be respected and students must fully understand 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*.

10.0 Promote Equitable and Culturally Safe Responses

- 10.1 The Superior North Catholic District School Board demonstrate a human rights-based, non-judgemental, culturally responsive, survivor-centered and trauma-informed approach to raising awareness, preventing, identifying and responding to sex trafficking. These protocols and interventions are rooted in upholding student/human rights under the *Ontario Human Rights Code*, and *Ontario Education Act*. All aspects of the protocol prioritize the safety, autonomy and choice of the student(s) impacted by trafficking.

11.0 Strategies to Raise Awareness and Prevent Sex Trafficking

- 11.1 The Superior North Catholic District School Board provides culturally responsive safe strategies to raise awareness about sex trafficking with students, staff, parents/guardians and caregivers, and the broader school community. It applies to in-person and/or online learning and includes all school and school board activities, including field trips, overnight excursions, board sponsored sporting events and school based afterschool programs.

- 11.2 In collaboration and consultation with the identified partners below, Superior North Catholic District School Board will further develop awareness activities to support building knowledge related to cyber-safety, signs of sex trafficking, stages and impacts as well as, the school procedures where to get help.
- 11.3 Partners include:
- 11.3.1 Administrators
 - 11.3.2 Staff
 - 11.3.3 Students
 - 11.3.4 Mental Health Lead
 - 11.3.5 Indigenous Education Lead
 - 11.3.6 Indigenous Education Advisory Council (IEAC)
 - 11.3.7 Special Education Advisory Council (SEAC)
 - 11.3.8 Catholic Parent Involvement Committee (CPIC)

12.0 Raising Awareness Among Parents and/or Guardians and Caregivers

- 12.1 Raising awareness among Parents and/or Guardians activities will include, but are not limited to:
- 12.1.1 Providing online sessions for parents/guardians and caregivers that includes, cyber safety, signs of trafficking and luring, how to get help, and the information on how to access the Anti-Sex Trafficking Protocol, including how and where to report.
 - 12.1.2 Sharing information, including links to the Canadian Centre for Child Protection website on Board approved social media platforms.
 - 12.1.3 Distributing digital resources and/or print materials to school communities and partners containing relevant information on signs and

stages of trafficking, as well as protocols on how to report/what to do if your child has experience grooming, luring, or trafficking.

- 12.1.4 Presentations with a variety of staffing groups on the impacts of sex trafficking within the school community.

13.0 Raising Awareness For Students To Prevent Sex Trafficking

- 13.1 The Superior North Catholic District School Board is committed to supporting students and the school community's safety and wellness. Prevention and education efforts are already taking place to reduce the risk of human trafficking and sexual exploitation.
- 13.2 Key partnerships and initiatives include:
 - 13.2.1 Implementation of board wide training by the Canadian Centre of Child Protection and board wide purchase of Kids in the Know resources.
- 13.3 Student awareness and prevention activities will include, but are not limited to:
 - 13.3.1 Building capacity with educators to help students learn skills to identify, develop and maintain healthy relationships to identify and respond to exploitive and coercive behavior and how to seek help as needed as these skills will help protect against human/sex trafficking, as found in the Health and Physical Education curriculum Grades 1-8 (2019) and the Family Life and Religious Education curriculum Grade 1-8 (2019).
 - 13.3.2 Classroom educators will be trained and encouraged to use the Kids in the Know prevention program in their classrooms
 - 13.3.3 In class/virtual presentations facilitated by community partners, including parish priests.
 - 13.3.4 Inviting student led initiatives
 - 13.3.5 The D.A.R.E and Keeping it Real programs offered by the OPP for elementary grades engage students in topics such as cyber safety, stranger danger, peer pressure, and resistance strategies.

13.4 Superior North Catholic District School Board students will be provided with the following information from school staff and administrators:

What to do if you or someone you know needs help?

*You can speak with an adult you trust, or call Canada’s confidential Human Trafficking Hotline at **1-833-900-1010** for information and support, visit canadianhumantraffickinghotline.ca If the individual is Indigenous, call, chat or text 1-855-554-4325.*

If there is immediate danger or if you suspect a child under 18 is being trafficked, call 911 or the Ontario Provincial Police.

14.0 Response Procedures

14.1 The Superior North Catholic District School Board is dedicated to creating an environment that encourages disclosures, allegations or suspicions to be reported. Prompt action is essential in regard to disclosures, allegations or suspicion of child abuse and/or sex trafficking. Reporting to a child welfare agency and/or the parents and/or guardians is required by law and is deemed necessary for the protection of students. All disclosures, allegations or suspicions are considered confidential.

14.2 When a staff member receives a disclosure or suspects sex trafficking

Steps and Considerations	Procedure
<p>Physical Safety</p> <p>Are there immediate safety concerns? Address those first.</p> <p>Ask the student if they would like to move to another private space.</p>	<ul style="list-style-type: none"> ● If there is an immediate safety risk to the student, call 911. ● Move to an area with privacy to avoid any breaches of confidentiality and call for classroom coverage. ● Do not leave the student alone. ● Remind the student of your

	obligation and your duty to report.
<p>Does the student have any physical/emotional needs? (e.g. food, water, comfort, fidget toys, items for colouring, etc.)</p> <p>Are their needs related to culture, language or accessibility that should be considered and included to build safety?</p>	<ul style="list-style-type: none"> ● Check in if the student has any physical needs that you can accommodate. ● Inquire/assess if there are any needs related to culture, language accessibility, etc.
<p>Take in student disclosure and know they are difficult experiences as students can be scared and emotionally vulnerable</p>	<ul style="list-style-type: none"> ● Listen without judgement. ● Regulate your own emotions. ● Acknowledge the bravery that it took for the student to disclose. ● Respond from a place of concern not judgement. ● Assure the student that their safety is a priority.
<p>Explain your role and what you will do next.</p> <p>Is there someone who can be present to assist with safety and advocacy if necessary?</p>	<ul style="list-style-type: none"> ● Be open and honest with the student about your next steps in supporting the student. ● If the student identifies you as a key support, and the administrator determines this is appropriate, offering to be present in further conversations between the student, administration, Mental Health Lead and/or community partners engaged in response. <p>Let the student know you will need to</p>

	<p>advise:</p> <ul style="list-style-type: none"> ● Administrator ● Child Welfare Services ● Parents/guardians and caregivers (if deemed safe)
Final Step	<ul style="list-style-type: none"> ● Contact the administrator of the school. ● Administrators will be required to contact the Mental Health Lead for coordination of services. ● Administrators and the Mental Health Lead will contact the Human Sex Trafficking Helpline for further support and direction (1-833-999-9211)

14.3 When an administrator receives a disclosure or suspects sex trafficking

Steps and Considerations	Procedure
If necessary before proceeding revisit the Anti-Sex Trafficking Protocol.	<ul style="list-style-type: none"> ● Review protocol and attached supporting documents before proceeding.
<p>Ensure safety of staff and student(s).</p> <p>Contact parents/guardians and caregivers only if you do not suspect</p>	<ul style="list-style-type: none"> ● Ensure that the student remains supported by staff. ● If there is a duty for the staff member to report, confirm that the staff have made the report ● If identified there is a duty to report,

<p>parents/guardians and caregivers are the traffickers or Child Welfare has not advised to wait on contacting parents. Do the parents/guardians and caregivers have any needs related to cultural safety, language, or accessibility? If so, please connect with supports listed on support page*</p>	<p>call child welfare</p> <ul style="list-style-type: none"> ● If child welfare is called, await instructions from child welfare before notifying parents.
<p>In collaboration with the Mental Health lead offer student/parents/guardians/caregivers community supports.</p>	<ul style="list-style-type: none"> ● Advise parents/guardians/caregivers and student that the Mental Health Lead will be contacted to make them aware of the disclosure and obtain community support information. ● Administrators and the Mental Health Lead will contact the Human Sex Trafficking Helpline for further support and direction (1-833-999-9211) ● Mental Health Lead will provide recommendations to connections for student/parents/guardians and caregivers with community support information.
<p>Debrief with staff. Receiving disclosures of sex trafficking and sexual violence can be challenging and supporting staff is a necessary step.</p>	<ul style="list-style-type: none"> ● Follow existing debrief practices for receiving disclosures. ● Offer support numbers for staff (e.g. EFAP) ● Offer to check in with staff.

<p>Human Trafficking Services and Supports in Ontario</p>	<ul style="list-style-type: none"> ● The following is a list of dedicated services and supports across Ontario that help victims, survivors and persons at risk of human trafficking: <p>https://www.ontario.ca/page/anti-human-trafficking-services-and-supports</p>
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15.0 Training for School Board Staff

- 15.1 As per PPM 166, Keeping Students Safe Policy Framework for School Board Anti-Sex Trafficking Protocols, training will be provided to all Board staff annually, on Professional Development days and/or at staff meetings. Training will continually be reviewed to stay current with emerging issues related to trafficking and changes in community services and response.
- 15.2 A tracking system will be used to ensure the completion of training modules and staff will be warned in advance about the content of the training, in case it triggers those who have had a related traumatic experience.
- 15.3 The Superior North Catholic District School Board will work with the Human Resource Department to secure virtual modules that can be added to the Health and Safety portion of training provided to all staff. The training will include the following content:
- 15.3.1 key definitions, common misconceptions and myths about sex trafficking, including tactics used for online luring, grooming and recruitment
 - 15.3.2 learning about human rights-based and trauma informed approaches to combat sex trafficking within anti-oppressive, anti-racist, equitable and gender-based frameworks
 - 15.3.3 information on protective factors and prevention-focused supports and resources
 - 15.3.4 information on risk factors and signs that a student is at risk, being

- lured, groomed or trafficked
- 15.3.5 signs that a student is involved in luring, grooming or trafficking others
- 15.3.6 response procedures, including the duty to report, how to handle disclosures to support students' safety, how to support students impacted by sex trafficking and how to share information to ensure privacy and confidentiality
- 15.3.7 supports available to students and affected staff, including culturally responsive supports
- 15.3.8 additional training resources to support staff to understand and safely respond to sex trafficking
- 15.3.9 roles and responsibilities of school board staff in raising awareness, identifying and responding to sex trafficking

16.0 Measuring Success: Accountability and Evaluation

- 16.1 Following the first year of implementation, school boards may be required to report to the Ministry of Education their activities to achieve the expectations outlined in this policy framework.
- 16.2 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. Beyond this first revision, the board agrees to review this protocol every five years, as is the requirement for all board policies and procedural guidelines.
- 16.3 Community anti-human trafficking partners and local agencies, such as child protective services like Children's Aid Societies and Indigenous Child and Family Well-Being Agencies, should be invited to participate in the reporting process to the Ministry of Education, in collaboration with school boards, to determine how the protocols have helped children and youth in care stay out of, or exit, human trafficking. This should be measured carefully with performance indicators on how the protocols are preventing trafficking in Ontario communities.

Appendix A - Support Contact Page

Support Contact Information

Name of Agency	Contact Number
Diocese of Thunder Bay	1-807-343-9313
Hearst-Moosonee Diocese	1-705-362-4903
Thunder Bay Anti-Human Trafficking Coalition	1-807-684-1051
Ontario Provincial Police	Emergency: 9-1-1 Non emergency: 1-888-310-1122
Anishinabek Police Services (APS)	1-800-438-5638
Nishnawbe Aski Police Services (NAPS)	1-800-654-6277
Children's Aid Society	1-800-465-3905
Dilico Anishinabek Family Care	1-855-623-8511
Tikinagan Child and Family Services	1-800-465-3624
NOSP (North of Superior Counseling Services)	1-877-895-6677
Marjorie House	1-800-465-3307
Northwestern Ontario Women's Centre	1-807-345-7802
Ontario Native Women's Association	1-800-667-0816
Sexual Abuse Centre Thunder Bay	1-866-311-5927
Sex Trafficking Hotline	1-833-999-9211