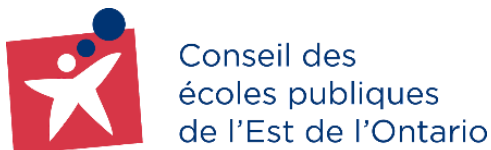


**Catholic District School Board of Eastern Ontario  
Conseil des Écoles Publiques de l'Est de l'Ontario  
Conseil Scolaire de District Catholique de l'Est Ontarien  
Upper Canada District School Board**

**Anti-Human Sex Trafficking School Board Protocol**  
January 31, 2022



## 1.0 PURPOSE

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<sup>1</sup>.

Welcoming and engaging school environments lead to positive student experiences, especially when families and communities are intentionally involved in the students' learning<sup>2</sup>. 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.

The purpose of the *Anti-Sex Trafficking Protocol* is to support coordinated action by all community partners to prevent, identify and recognize sex trafficking and develop responses to facilitate early and appropriate intervention. To that end, this protocol:

- Provides a summary of key principles supporting the implementation of this protocol
- Provides strategies to raise awareness of sex trafficking;
- Provides procedures for intervening with students at risk for sex trafficking or being trafficked, or with those who groom or recruit other students;
- Outlines the process for ongoing training for staff; and,
- Defines approaches for accountability and evaluation.

## 2.0 DEFINITION OF SEX TRAFFICKING

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 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 additionally vulnerable to experiencing sex trafficking. The intersections of colonization, intergenerational trauma, systemic discrimination and barriers to accessing services 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.

## 3.0 STATEMENT OF PRINCIPLES

### 3.1 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 parents and guardians should be trauma informed.

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<sup>1</sup> In response to: [Legislative Assembly of Ontario, Private members' motions](#), 42nd Parliament, 1st Session, Motion 122 voted and carried on December 3, 2020.

<sup>2</sup> Ministry of Education. (2021). [Parent Engagement: Encouraging Parent Involvement in Schools](#).

When approaching diverse communities, consideration of historic and systemic barriers 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.

### **3.2 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.

### **3.3 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.

### **3.4 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.

### **3.5 Build up school-based prevention**

The development of the 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.

### **3.6 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*.

### **3.7 Promote equitable and culturally safe responses**

Protocols should 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.

## 4.0 STRATEGIES TO RAISE AWARENESS AND PREVENT SEX TRAFFICKING

### 4.1 School Board

The school board's protocol must include culturally safe strategies to raise awareness about sex trafficking with students, staff, parents, families and the broader school community. The protocol should apply to in-person and online learning, and include all school and school board activities, including field trips, overnight excursions, board-sponsored sporting events and board-operated before- and after-school programs. The Board undertakes to make the protocol and related procedures and resources publicly available and accessible on its website.

Ontario supports a series of [human trafficking prevention and awareness activities](#). Resources to help educate children and youth include:

- [“The Trap”](#), a digital human-trafficking education tool
- [“Speak Out: Stop Sex Trafficking”](#), an awareness campaign targeting the Indigenous community
- [Canadian Centre for Child Protection](#), resources for all stakeholders
- [Kidshelpphone.ca](#), resources for all youth

### 4.2 Awareness strategies for students

Awareness strategies for students must include:

- A process to raise awareness among students on the signs a student is being targeted, lured, trafficked or is trafficking another student, and how to bring their concerns regarding luring, grooming, recruitment or existing sex trafficking to the school without fear of reprisal.
- A process to enable students to bring their concerns forward anonymously.
- A process to help prevent recruitment of students for sex trafficking, including through curriculum-based learning about healthy relationships, consent, mental health and well-being, coping skills, personal safety and online safety, as well as through work with local community-based organizations and survivors.
- Consideration of the use of available technology and tools to identify and deter potential situations involving students who could be at risk of sex trafficking and other online threats using school board-provided technology.
- Include the telephone number of the [Canadian Human Trafficking Hotline](#), to raise awareness about the support and referral services it offers.
- Supports for youth post-trafficking.

### 4.3 Awareness strategies for parents and families

Develop awareness strategies for parents and families on the following topics:

- cyber-safety;
- the signs that a student is being targeted, lured, groomed, trafficked or is trafficking another student; how to get help safely (for example, through the school board, community providers or a support hotline);
- how they can report concerns to the school board (including anonymous reporting) and the school board's process for responding to concerns;
- the process should include approaches to overcome barriers to participation that Indigenous, Black, newcomer and other parents/guardians may face.
- Supports for families post-trafficking.

### 4.4 Social Media

Engage the Board community on social media. Social media posts are designed specifically for schools' boards and educators to help share important resources and supports with families.

May include:

- Dangers of social media
- Keeping youth safe
- Phone scams-attempting to lure youth

## **5.0 VICTIM POPULATIONS AND SIGNS**

### **5.1 Who is at an Increased Risk of Sex Trafficking**

Traffickers identify a person's vulnerabilities and then target those vulnerabilities to gain trust and form a bond. Since everyone has vulnerabilities, anyone can be at risk of being trafficked. However, there are some specific risk factors that may make an individual more vulnerable:

- Students who are 2SLGBTQQIA+ experience high rates of bullying, assaults and sexual abuse, and they may face isolation or displacement if they experience rejection from their family or the community
- Indigenous and racialized women and children – Indigenous peoples are especially vulnerable to sex trafficking due to historic and ongoing systemic discrimination, First Nation youth transitioning from remote Northern communities to schools in urban centres can also face increased safety risks
- Students with disabilities may experience bullying and isolation in addition to having difficulty understanding the intentions of others
- Children and youth in care or transitioning out of care
- Language barriers, isolation, economic disadvantage or a lack of community and social supports may leave youth with increased vulnerability to trafficking
- Homeless and marginalized youth
- Individuals with low self-esteem, who are isolated or lack a sense of belonging.
- Individuals with unstable home/family environment.

### **5.2 Warning Signs that Someone may be a Victim of Human Trafficking Include:**

- Being controlled by others, driven to and from locations, and escorted at all times
- Being controlled and watched by others, having someone speak for them in public
- Not having a passport or other forms of I.D. in their possession
- Not having control of their own money or cellphone, may have more than one cellphone in their possession
- Passport and ID documents confiscated by others
- Not being familiar with the neighborhood they live or work in
- Being moved frequently; claim to be “new” or “just visiting”
- Not being allowed to contact family or friends, isolation from family and friends
- Lying about age/false ID
- Providing scripted or rehearsed answers to casual questions
- May be in possession of excess cash outside their financial means, prepaid credit cards and/or have hotel keys
- A boyfriend/girlfriend who is significantly older than the student
- Sudden decline in academic performance
- Tattoos/branding (burning) suggesting ‘ownership’
- Changing phones often
- Unknown boyfriend/girlfriend, that no one knows very much about

### 5.3 Mental Health or Signs of Abnormal Behaviour

- Act in a fearful, anxious, submissive, or nervous manner, excessive concern about displeasing partner/employer
- Fearful of law enforcement or immigration services
- Avoids eye contact, has another person speak for them
- May have visible signs of substance dependency
- Expressing fear and intimidation through facial expressions or body language
- Suddenly spending more time away from home/late at night

### 5.4 Physical Appearance

- May be dressed in age-inappropriate clothing
- May be dressed in clothing inappropriate for the time of year or context
- May suddenly have expensive clothing, purses, shoes, nail services
- Branding with tattoos of the trafficker's name or symbol
- May have bruises or other signs of physical abuse including malnourished
- Lacking in basic medical services or is being denied services by employer
- May show signs of being physically restrained, confinement or torture
- Change in appearance, hair, nails, etc.

### 5.5 Victims may:

- Not know they are being victimized because they have a relationship with their trafficker – it could be their boyfriend or friend
- Not appear to need assistance because they have a place to live, food to eat, nice clothes, medical care and even a “paying job”
- Be unaware of their rights, or may have been intentionally misinformed about their rights so they don't know they can receive help
- Be taught to distrust and fear the government and law enforcement officers because they are afraid they will get arrested or deported (if from another country)
- Feel alone, isolated, helpless with nowhere else to turn. Subsequently they will do as they are told
- Fear for their safety or the safety of someone known to them, as some traffickers will threaten to harm the victim, their friends or family members if they report their situation to, or cooperate with law enforcement
- Feel as though they have a debt to “pay back” – for things like gifts, drugs, accommodation, recruitment fees etc.
- Suffer trauma and psychological effects. In human trafficking related to sexual exploitation, the victims may be exposed to higher incidences of HIV and sexually transmitted infections
- Become homeless, couch surfing

## 6.0 RESPONSE PROCEDURES

### 6.1 Setting the context

Intervention procedures must be trauma-sensitive and culturally responsive and, at minimum, include the following elements or direction to school board employees:

- A designated contact person/persons at the school board who is familiar with the school board's anti-sex trafficking protocol and who can support school board employees with response procedures.

- The process for responding to situations where a student may be at risk of or is being sex trafficked, including steps for safely reporting concerns, responding to disclosures and supporting the student's immediate physical and emotional safety.
- The process for responding in situations where a student could be involved in the trafficking of others, including steps for safely reporting concerns, responding to disclosures and supporting the student's immediate physical and emotional safety.
- The process for responding to and supporting students re-entering school after they have been involved in a trafficking situation, including efforts to ensure that adequate safety and security needs are being met in order to support re-integration into school.
- Guidance on the requirements related to the duty to report a child in need of protection under Section 125(1) of the [Child, Youth and Family Services Act, 2017](#) and under [Policy/Program Memorandum No. 9: Duty to Report Children in Need of Protection](#) and the [Child Protection School Handbook](#), available through the school board.
- The process of notifying appropriate school or school board contacts and parents/guardians, as applicable.
- The process for school administrators to communicate and collaborate with community-based service providers, local police services, local Children's Aid Societies and Indigenous Child and Family Well-Being Agencies, as applicable and/or required by law, when responding to situations of suspected or confirmed sex trafficking of students.
- Direction on the approach for referring all affected students (including those indirectly affected, as needed) to supports.
- Direction on the approach for responding to possible sex trafficking recruitment by a student within the school, including appropriate interventions, supports and/or consequences, as applicable. Expectations should be consistent with the school board's policy on progressive discipline and the mitigating circumstances that must be considered when determining the intervention, consequences or supports. For students with special education needs, information in the student's Individual Education Plan (IEP) must be considered.
- Direction on monitoring and following-up on incidents reported (for example, check-ins with affected students).
- Direction on documenting suspected or reported sex trafficking situations and response procedures that were implemented.
- Information on culturally responsive and trauma-sensitive personal supports available to school board employees responding to sex trafficking situations.
- All response procedures should be followed whether the trafficker is believed to be inside the school or in the community.

## **6.2 Response procedure when a student is at risk of or is being sex trafficked**

Response procedures must include addressing the needs of:

- students with special education needs, mental health needs, social or emotional needs or language/cultural barriers, and international students;
- students who are in care, receiving care or in customary care arrangements;
- students who are being trafficked and who may be involved in the recruiting of other victims, including students who are returning to school after they have been involved in a trafficking situation;
- parents, including those who may live overseas or who may not speak English or French;
- students 18 years or older, or who are 16 or 17 years old and have withdrawn from parental control.

### **6.3 Response procedures in situations where a student targets, lures, grooms or recruits children and youth for the purpose of sex trafficking**

Response procedures must include addressing the needs of:

- students with special education needs, mental health needs, social or emotional needs or language/cultural barriers, and international students;
- students who are in care, receiving care or in customary care arrangements;
- students who are being trafficked and who may be involved in the recruiting of other victims, including students who are returning to school after they have been involved in a trafficking situation;
- parents, including those who may live overseas or who may not speak English or French;
- students 18 years or older, or who are 16 or 17 years old and have withdrawn from parental control.

### **6.4 Response procedures in situations where students are returning to school after having been trafficked themselves or involved in trafficking others**

Response procedures must include addressing the needs of:

- students with special education needs, mental health needs, social or emotional needs or language/cultural barriers, and international students;
- students who are in care, receiving care or in customary care arrangements;
- students who are being trafficked and who may be involved in the recruiting of other victims, including students who are returning to school after they have been involved in a trafficking situation;
- parents, including those who may live overseas or who may not speak English or French;
- students 18 years or older, or who are 16 or 17 years old and have withdrawn from parental control;
- Supports for students and families post-trafficking.

### **6.5 Privacy and confidentiality**

The Board collects, uses and discloses personal information in accordance with the Ontario *Municipal Freedom of Information and Protection of Privacy Act*, the *Child, Youth and Family Services Act, 2017* and any other applicable legislation.

## **7.0 TRAINING FOR SCHOOL BOARD EMPLOYEES**

The school board protocol outlines a process for providing ongoing training for school board employees, including teachers, administrators, and other school staff. Training will be approached through a trauma informed lens.

### **7.1 Board commitment**

The Board is committed to providing employees with ongoing training. The training will be tracked and be available throughout the year to all new and existing school board employees.

### **7.2 Training content**

Training must include the following elements:

- key definitions, common misconceptions and myths about sex trafficking, including tactics used for online luring, grooming and recruitment
- learning about human rights-based approaches to combatting sex trafficking, including the application of an equity lens, anti-racism, a gender-based lens, trauma-sensitive approaches, and Indigenous cultural competencies;
- information on protection factors and prevention-focused supports and resources;



- information on risk factors and signs that a student is at risk, being lured, groomed or trafficked;
- signs that a student is, or is involved in, luring, grooming or trafficking others;
- intervention 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 while ensuring privacy and confidentiality;
- supports available to students and affected staff, including culturally responsive supports;
- additional training resources to support staff in understanding and safely responding to sex trafficking;
- roles and responsibilities of school board employees in raising awareness, identifying and responding to sex trafficking.

Training will be updated and delivered regularly to stay current with emerging issues relating to trafficking and changes in community services and response.

## **8.0 MEASURING SUCCESS: ACCOUNTABILITY AND EVALUATION**

The school board should review its protocol after the first year of implementation and going forward no less than every five years, or as part of their regular policy review cycle – whichever is the shorter period.

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

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.