



ADMINISTRATIVE GUIDELINE

Safe Schools: Anti-Sex Trafficking Protocols

Effective Date: January 11, 2022

Responsibility: Superintendent of Safe Schools

1. PURPOSE

The Keeping Students Safe policy (PPM 166) sets a strong foundation for Ontario school boards to build local anti-sex trafficking protocols that support coordinated action by community partners. These protocols, as outlined in this Administrative Guideline, will help prevent, identify and recognize sex trafficking and develop responses to facilitate early and appropriate intervention. To ensure current, accurate and relevant materials are used to inform this protocol, train staff and educate students, parents and guardians, the policy will be reviewed every 5 years.

Developed in partnership with the Ministry of the Solicitor General and the Ministry of Children, Community and Social Services, the purpose of this protocol is to promote collaboration with community police services, local child welfare agencies and other community organizations and service providers serving children, youth and their families to create community-centered anti-sex trafficking protocols.

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.

Beginning January 1, 2022, the Ontario college of Teachers is making sexual abuse prevention training mandatory for all Ontario Certified Teachers (OCTs) and all teacher applicants. OCTs are legislatively required to successfully complete the program and OCT members will receive a notation on their public register profile indicating that the program has been completed. This program compliments Section 7 of this administrative guideline *Training for School Board Employees*.

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.

2. 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.

3. STATEMENT OF PRINCIPLES

Define 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 support anti-sex trafficking approaches that are responsive to diverse students and the needs of local school communities.

NNDSB has partnered with the Canadian Centre for Child Protection (C3P) to provide training for staff, parents and community members, as well as developmentally appropriate learning materials for students that align with the expectations of the Ontario Curriculum. The Canadian Centre for Child Protection is a national charity dedicated to the personal safety of all children. Their goal is to reduce the sexual abuse and exploitation of children, assist in the location of missing children, and prevent child victimization through a number of programs, services, and resources for Canadian families, educators, child-serving organizations, law enforcement, and other parties.

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.

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.

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

Protocols should demonstrate a human rights-based, non-judgmental, culturally responsive, survivor-centred and trauma-informed approach to raising awareness, preventing, identifying and responding to sex trafficking.

4. TACTICS USED BY SEX TRAFFICKERS

Traffickers use tactics to identify and groom vulnerable children and youth by fulfilling their unmet needs such as love, affection, a sense of belonging and other basic needs like housing or food security and/or by using threats, physical violence and control. An unstable home life and past trauma, as well as other factors such as a history of childhood abuse or involvement with the child welfare system, can leave students more susceptible to being trafficked.

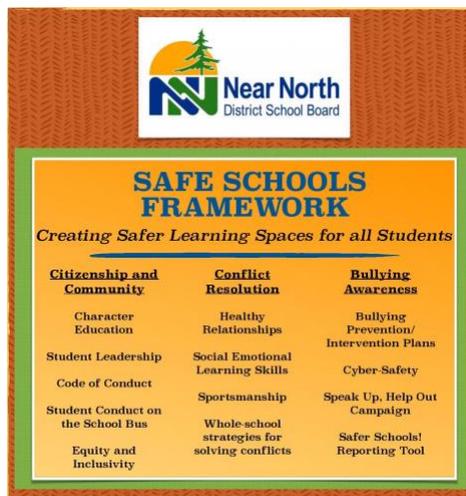
Traffickers can use tactics such as befriending students on online platforms and pretending to be a love interest or encouraging the student to leave their rural/remote community to come to the city for work. Isolating the victim from family and friends is the ultimate goal, followed by normalization of abuse through a gradual grooming process.

It is well known that children who are abused or exploited are often victimized by a parent or guardian. But what is not as readily acknowledged is the role that a parent or guardian or person in a position of trust plays in the broader context of sex trafficking. For example, the International Survivors' Survey conducted by the Canadian Centre for Child Protection showed that there are cases where parents and other family members involved in the sexual exploitation and trafficking of their children.

Not all sex traffickers are adults. School-aged children and youth may also be involved in trafficking their peers. According to Statistics Canada, between 2009 and 2018, there were approximately 1400 victims of human trafficking reported to police in Canada, and 6% of the accused persons identified were between the ages of 12 to 17. School-aged children and youth will benefit from early intervention to reduce their vulnerability

5. STRATEGIES TO RAISE AWARENESS AND PREVENT SEX TRAFFICKING

The entire Near North District School Board is committed to creating safe learning spaces for your child. To that end, the Safe Schools Framework was developed to ensure that students participate in learning year-round that fosters an inclusive, welcoming and safe environment. Throughout the year, all schools participate in activities that focus on creating safer schools through Citizenship and Community; Conflict Resolution; and Bullying Awareness. Each of these three domains contain additional subtopics that support and reinforce the main idea. Character education, for example, is a key component of creating future citizens, while understanding cyber safety will help prevent incidents of bullying by keeping students safe online. These three domains work together to create Safe and Accepting schools, which is part of our Well-being Strategy and contains many pieces that will support our anti-sex trafficking education and prevention programs.



Education for Students

Frequent use of mobile phones and computers can make it harder for caring adults to recognize the signs that a student is being groomed and lured. This increases the importance of educating students about both the positive and negative potentials of the internet, including the harmful impacts of violent depictions in sexually explicit imagery. Traffickers and other sexual predators are increasingly using online social medial platforms

to lure, groom and recruit young people into sexual acts or services. Technology can provide an easy point of access into conversation and relationships with unsuspecting students.

The Keeping Students Safe policy builds on the 2019 *Health and Physical Education* (HPE) curriculum for Grades 1 to 8, which supports students in learning how to identify, develop and maintain healthy relationships, to identify and respond to exploitative and coercive behaviour, and how to seek help as needed. These skills help protect students from sex trafficking by teaching them to identify when they are in an unsafe situation. The curriculum is designed to be developmentally-appropriate; as students age, they continue to learn about and practice the skills they need to stay safe (in person and online), and how to best help themselves and others. Students also learn about the impacts of sexually explicit media, including pornography. In every grade, students learn about consent and what constitutes a healthy relationship.

To further support the Ontario curriculum learning expectations, all teachers in NNDSB will teach *Kids in the Know*, an interactive safety education program designed by the Canadian Centre for Child Protection. The purpose of the program, designed for students from kindergarten to high school, is to help educators teach children and youth effective personal safety strategies. This engaging program builds resiliency skills and reduces the likelihood of victimization in an online and offline world. *Kids in the Know* is a research and evidence-based program that balances empowerment with protection using activity-based learning while supporting important discussions about personal safety without the use of fear.

Kids in the Know has received the nationally-recognized Curriculum Services of Canada seal of approval, with lessons matched to the learning outcomes found in the Ontario curriculum. Through this program, students will learn about:

- Healthy relationships
- Safe and responsible use of technology
- Addressing high-risk behaviour
- The public nature of the internet and loss of control of shared content
- Building capacity to handle difficult situations
- Knowing when and how to seek help

Students can also benefit from resources available from PREVNet. This website works to eliminate violence and promote healthy relationships for youth. They are dedicated to addressing the systemic racism and the impacts of colonization that puts marginalized groups at higher risks of violence. Students will access materials on:

- Youth dating violence
- Cyberbullying
- Online and offline targeting, luring, and grooming tactics
- Healthy relationships and consent
- Mental Health and Well-being
- Online and offline personal safety practices

Education for Parents

NNDSB will continue working alongside the Canadian Centre for Child Protection to provide parents, caregivers and community members with information about cyber safety; the signs that a student is being targeted, lured, groomed, trafficked or is trafficking another student; and how to get help safely.

Through regularly scheduled annual information sessions, newsletters, social media posts and emails, NNDSB will promote educational opportunities that will help parents understand the online risks and emerging trends that can lead to the sexual exploitation of children. These learning opportunities will also provide tips and resources for parents and caregivers about how to have supportive conversations that will keep their children safe online. The most up-to-date information can also be found on C3P's parent website: protectchildren.ca

Parents, caregivers and community members can report concerns directly to their child's school by speaking with the teacher, Principal, Vice-Principal, or any other school staff member. Alternatively, concerns can be communicated to the board using our SAFER SCHOOLS! Reporting tool. This reporting tool provides anyone with the opportunity to disclose any incident or behaviours that create unsafe spaces in our NNDSB schools. The tool can also be used anonymously. For more information about the SAFER SCHOOLS! Reporting tool, visit the [Safe and Accepting Schools](#) page on the NNDSB website.

Any information provided via the reporting tool by a parent, caregiver, student, staff, community member, or anonymously, will be received by the school's principal so that it can be further investigated. Pending the results of that investigation, the principal may elect to elicit other resources and supports, such as the members of the NNDSB Mental Health Team, or other outside agency supports, including the services of the Children's Aid Society, the Indigenous Friendship Centre, the Ontario Provincial Police, North Bay Police Services or others.

Anyone is able to report trafficking or suspected trafficking, including sex trafficking, utilizing the [Canadian Human Trafficking Hotline](#).

While any student can be sex trafficked, some groups are at increased risk of being trafficked.

- Systemic racism and discrimination have led to a disproportionate number of Indigenous and Black children and youth in care, which can lead to a lack of consistent relationships with caring adults and peers in schools.
- Indigenous peoples are especially vulnerable to sex trafficking due to historic and ongoing systemic discrimination, including intergenerational trauma resulting from residential schools and the "Sixties Scoop". First Nation youth transitioning from remote Northern communities to schools in urban centers can also face increased safety risks.
- Language barriers, isolation, economic disadvantage or a lack of community and social supports may leave newcomer youth with increased vulnerability to trafficking.
- Students with disabilities may experience bullying and isolation in addition to having difficulty understanding the intentions of others.
- 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.

6. RESPONSE PROCEDURES

Every school board employee has a duty to respond in situations where a student:

- may be at risk of or is being sex trafficked
- may be targeting, luring, grooming or recruiting children and youth for the purpose of sex trafficking
- is returning to school after they have been trafficked or involved in trafficking others

The responses enacted by the school, internal board supports and outside agencies must take into account the needs of our diverse learners and their families, which may include:

- 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 and/or 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

The following response procedure must be followed when a teacher, principal, vice-principal or staff member knows or suspects that trafficking and/or sex trafficking is occurring, or has previously occurred, involving a student of the board:

- Staff member reports concern to school Principal
- Principal contacts Principal of Safe Schools, their school's Supervisory Officer, and the Superintendent of Safe Schools. Determinations must be made as to whether:
 - the student is at risk of being sex trafficked
 - the student is being sex trafficked
 - the student is engaged in the trafficking of others
 - the student was previously sex trafficked and is returning to school
- Principal of Safe Schools makes internal referral to NNDSB Mental Health Lead and, in conjunction with the School Principal, determines next steps of action and who will be responsible for completing each action. Next steps may include:
 - Creating an internal support services plan
 - Reporting to Children's Aid as per Section 125(1) of the *Child, Youth and Family Services Act, 2017* and under *Policy/Program Memorandum 9: Duty to Report Children in Need of Protection*.
 - Reporting to Police services

- Contacting the Parent(s)/Guardian(s) as appropriate
 - Obtaining outside victim support services
 - Connecting student with outside well-being agencies, such as the Indigenous Friendship Centre
 - Consult with Cybertip.ca if there is an online component to the student victimization
- Consideration for the following must be taken into account when determining next steps:
 - How best to support the student's immediate physical and emotional safety
 - Steps for safely reporting concerns to above mentioned parties, as applicable
 - How to best meet the safety and security needs of the student at present and in the future
 - For students with special education needs, information from the student's Individual Education Plan must be considered to inform next steps
 - How best to support the immediate safety and security of other affected students
 - How to best utilize culturally responsive and trauma-informed supports to support the student, affected students, and reporting/responding staff members.
- All staff involved will work with professionalism to ensure the student's dignity and privacy is maintained throughout the reporting process. Staff will maintain the confidentiality and privacy requirements required when responding to a suspected or confirmed instance of sex trafficking.
 - Consideration will be given to those students who may be indirectly affected and supports put into place, as determined on a case by case basis and in consultation with the NNDSB Mental Health Team.
 - When responding to possible sex trafficking recruitment by a student within the school, the same procedure will be followed. Expectations should be consistent with the school board policy on progressive discipline and the mitigating circumstances that must be considered when determining the intervention, consequences or supports.
 - When responding to students who are victims and survivors of sex trafficking, the same procedure will be followed to create a re-entry plan, as determined on a case by case basis and in consultation with the NNDSB Mental Health Team. The re-entry plan will include access to education and facilitating school re-entry for those returning to school.
 - Following-up at regular intervals (for example, check-ins with affected students) will be embedded directly into action and/or support plans created and determined as part of next steps and completed by the Mental Health Team.
 - The Principal of Safe Schools will be responsible for collecting data on the suspected or reported sex trafficking situations, the response procedures that were implemented, and the required monitoring/follow-up.

7. TRAINING FOR SCHOOL BOARD EMPLOYEES

NNDSB has partnered with the Canadian Centre for Child Protection to ensure that all staff receive the training they require to identify the signs of sex-trafficking, safely respond to disclosures, be culturally relevant, respond to diverse student populations and support the immediate physical and emotional safety needs of students. Training will include how to respond to immediate dangers and the need to avoid certain actions that could make an individual's situation worse or more unsafe. This training is complimentary to the mandated sexual abuse prevention training required by all Ontario Certified Teachers (OCTs) and all teacher applicants.

This training will be accomplished through C3P's *Commit to Kids Child Sexual Abuse Prevention Training*. This 2.5 hour certificate level training will empower all adults who work with children and youth to become protective adults. This training aligns with the information found in this policy and PPM 166, and will include:

- 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-informed approaches and Indigenous cultural competencies
- information on protective 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 involved in luring, grooming or trafficking others
- 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
- 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

The training will be tracked to ensure that all employees have the knowledge and skills they need to prevent and combat our students from becoming victims of sex-trafficking. Training is available throughout the year, however dedicated time during professional development sessions will be utilized to provide an annual review of the training so that our staff stay current with emerging issues relating to trafficking and changes in community services and response.

8. MEASURING SUCCESS: ACCOUNTABILITY AND EVALUATION

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.

Working alongside community partners such as the Children's Aid Society, the Indigenous Friendship Centre, the Ontario Provincial Police, North Bay Police Services or others, NNDSB will look to review and reflect on how this Administrative Guideline was used to help children and youth stay out of, or exit, human trafficking. Internal performance indicators will include student and staff surveys to measure the efficacy of the learning and training materials, as well as an examination of our internal referrals to the Mental Health Team for supports relate to trafficking or suspected trafficking.

Appendix A: glossary of terms

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

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.

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.” [footnote 9\[9\]](#)

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.” [footnote 10\[10\]](#)

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.” [footnote 11\[11\]](#)

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.” [footnote 12\[12\]](#)

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.” [footnote 13\[13\]](#)

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.