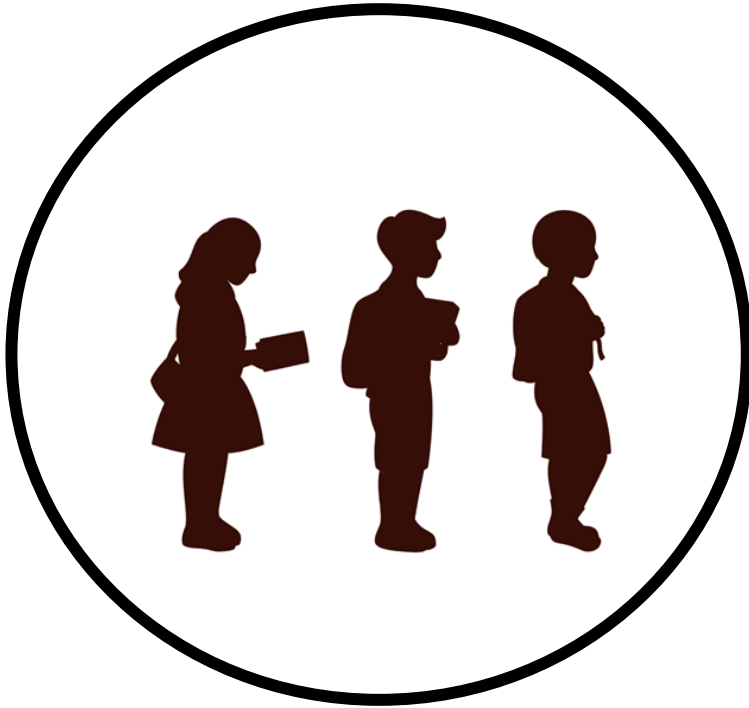




THE PROTESTANT SEPARATE  
SCHOOL BOARD OF THE  
TOWN OF PENETANGUISHENE



# Anti-Sex Trafficking School Board Protocol

Version 2 –August 2022  
Version 1 –January 2022

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# ANTI-SEX TRAFFICKING SCHOOL BOARD PROTOCOL

## 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. The Protestant Separate School Board of the Town of Penetanguishene (PSSBP) is committed to working collaboratively with community and school partners to engage in 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>.

PSSBP's commitment to providing a consistently, welcoming and engaging school environment will help 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 regarding prevention and promote healthy relationships, notice 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.

## 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 in exchange of anything of value to the victim in exchange for sex; giving food to a hungry child, cell phones, clothing, shelter, drugs and promises of love and protection. Most individuals who are trafficked for the purpose of sexual exploitation are women and girls, but all people, all gender, age and race may be targeted.

Indigenous and racialized individuals are especially vulnerable to 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

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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](#).

Indigenous women and girls – of whom comprise a disproportionate number of trafficked persons for the purpose of sexual exploitation, in Canada.

## **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. As per the processes for child protection reporting, 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 will be involved in efforts to develop actions against sex trafficking when developmentally appropriate for elementary aged students, ensuring trauma informed considerations first.

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.

PSSBP will continue to work collaboratively with our partners in faith communities (Covenant Church), Indigenous partners (Metis Nation Ontario), and community partners, Kinark, Big Brothers Big Sisters, La Maison Rosewood Shelter, The Youth Hub, Compass Committee and the OPP community officer connection.

### **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 receive anti-sex trafficking training appropriate to their position within the board, 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 emphasizes how to respond to immediate dangers and the need to avoid actions that will make an individual's situation worse or more unsafe as per the processes for child protection and reporting.

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

The development of the protocol complements existing prevention efforts within PSSBP, including the teaching of consent, healthy relationships and healthy sexuality. School staff will be provided with training to help them 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. There are multiple opportunities to explore how professional development could help support teaching practices to better inform students about protective factors and anti-sex trafficking. The K-8 PHE curriculum begins with understanding all body parts in grade 1 (D1.3), grade 2 covers stages of development and body appreciation (D1.4, D1.5), grade 3 covers healthy relationships and consent (D1.4), grade 4 begins to cover puberty (D1.5), grade 5 covers reproduction (D1.3) and help seeking (D2.6), grade 6 covers sexually explicit media, puberty/relationships, decision making and consent, (D1.3, D2.5 D2.6), grade 7 covers sexual health, and decision making, relationships, dangers of technology (D1.1, D2.2, D2.4), grade 8 covers gender identity/sexual orientation, relationships and intimacy (D1.5, D3.3).

### **Respect confidentiality, privacy and informed consent**

The development of procedures will 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 continue 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**

This Protocol and associated processes will 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.

## **STRATEGIES TO RAISE AWARENESS AND PREVENT SEX TRAFFICKING**

- Protocol and related procedures/resources will be publicly available and accessible on the school board website.
- Raise awareness among staff, parents and caregivers about:
  - 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 and/or support hotline) Call 911, at school you can talk to teacher, the social worker, administration (principal, VP, outside of school you can dial 911, call/text KidsHelpPhone, talk to family doctor or use local

mental health supportS. The Canadian Human Trafficking Hotline has support and resources available 1-833-900-1010

- how they can report concerns to the appropriate community partners and how the school board's will support and respond to concerns
- Raising awareness among students will be considered as developmentally appropriate and evidence informed approaches for anti-sex trafficking become available and community partners become available to provide support. Staff will receive professional development (at varying levels depending on their role within the school board), on how to support student learning through the curriculum (PHE 2019, K-8) and where it allows will have resources to support student learning on the signs a student is being targeted, lured, groomed, trafficked or is trafficking another student, and how to bring concerns about luring, grooming, recruitment or exiting sex trafficking to the school without fear of reprisal. As per child protection processes, this will allow for concerns to be brought forward anonymously.
- Awareness for PSSBP staff will continue annually with a review at beginning of school year similar to review of duty to report and suicide intervention protocol
- To help prevent recruitment of students for sex trafficking we will continue curriculum-based learning about healthy relationships, consent, mental health and well-being, coping skills, personal safety and online safety, as well as continuing ongoing work with local community-based organizations related to prevention.
- Consideration will be given to the of 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, while using school board-provided technology.
- Awareness strategies may also involve sending letters or emails, providing information in a student handbook, displaying posters, hosting information sessions, posting on the school/school board social media accounts, and/or posting information on the school board website. Such as providing information on the Canadian Human Trafficking Hotline Canadian Human Trafficking Hotline, 1-833-900-1010

## **RESPONSE PROCEDURES**

- If a PSSBP staff member becomes aware that a student is at risk of or is being sex trafficked they will inform administration and report to child protective services as appropriate. Staff and administration will also contact the Mental Health Lead to support reporting and discussion/decisions made. A specialist with Family Connexions is available to assist in decisions related to duty to report and police reporting.
- If a PSSBP staff member becomes aware that a student may be targeting, luring, grooming or recruiting children and youth for the purpose of sex trafficking, they will inform the

principal or designate without exception, and if there is a duty to report contact child protective services.

- If a student is returning to school after they have been trafficked or involved in trafficking others there will be a transition plan including the student, their family/caregivers, the Mental Health Lead, administration and any other relevant team members (community partners for ex: child protective services, special education, language/cultural supports).
- Response procedures will be trauma-informed and culturally responsive and, at minimum, include the following elements or direction to school board employees:
- The Mental Health Lead or designate will support school board employees with response procedures.
- Mental Health Lead or designate will support school board employees with response procedures
- Staff are aware and will be provided with annual review regarding 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.
- Staff are aware and will be provided with annual review regarding the process for responding to situations where a student may be engaged in the trafficking of others, including steps for safely reporting concerns, responding to disclosures and supporting students' immediate physical and emotional safety.
- Staff will be informed on a case by case basis the transition plan and 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 to support reintegration into school.
- Review (occurs annually in fall PD) 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 9: Duty to Report Children in Need of Protection. Duty to report
- Information will be provided on legislated privacy and confidentiality requirements (reviewed annually with staff) when responding to a suspected or confirmed instance of sex trafficking.
- School administrators and their designates in communication with the Supervisory Officer and Mental Health Lead will 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, in responding to situations of suspected or confirmed sex trafficking of students. (suicide prevention protocol for referral to external agencies).

- As part of the promotion of local and online resources for students, staff will be informed and will review annually the process for providing families and students with referral information to all affected students (including those indirectly affected, as needed) to supports. (post-vention from suicide protocol applicable to transitioning back ie:, refer students to in school supports, community partners and hotlines, kids help phone as needed).
- PSSBP employees will be provided with support and will be required to report to administration in the event of suspicion of any possible sex trafficking recruitment. Expectations will 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. For students with special education needs, information in the student's Individual Education Plan must be considered when determining interventions, supports and/or consequences.
- Staff will be provided with direction on monitoring and following-up on incidents reported (for example, check-ins with affected students, role of social work and team - with ongoing communication with administration as needed within confines of confidentiality and privacy laws)
- Staff will be provided with direction on documenting suspected or reported sex trafficking situations and response procedures that were implemented (see appendix for documentation form).

#### **TRAINING FOR SCHOOL BOARD EMPLOYEES 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 to understand and safely respond to sex trafficking

- roles and responsibilities of school board employees in raising awareness, identifying and responding to sex trafficking

The training will be updated and reviewed annually with resources available throughout the year to all new and existing school board employees. The Mental Health Lead will continue to be involved in any ministry of education meetings/training as well as training via School Mental Health Ontario, community partners and other relevant evidence based resources.

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

PSSBP will keep track of the activities that support the implementation of the anti-sex trafficking protocol. PSSBP has been and will continue to collaborate with The Ministry of Education, community partners and anti-human trafficking partners, to support the development of 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.

## 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<sup>3</sup>.”

**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<sup>4</sup>.”

**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<sup>5</sup>.”

**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<sup>6</sup>.”

**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

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<sup>3</sup> Indigenous Primary Health Care Council. (2018, June). [Cultural Competency Guideline for Ontario Public Health Units to Engage Successfully with Aboriginal Communities](#).

<sup>4</sup> Williams, R. (1999). Cultural safety—what does it mean for our work practice?. Australian and New Zealand journal of public health, 23(2), 213–214.

<sup>5</sup> Douglas, M. D., Willock, R. J., Respress, E., Rollins, L., Tabor, D., Heiman, H. J., & Holden, K. B. (2019). Applying a health equity lens to evaluate and inform policy. Ethnicity & disease, 29 (Supplement 2), 329

<sup>6</sup> UNICEF. (2016, January 23). [A Human Rights-based Approach to Programming: What is HRBAP?](#)

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<sup>7</sup>.”

**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.

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<sup>7</sup> Government of Canada. (2018, February 2). [Trauma and Violence-informed Approaches to Policy and Practice](#).

## Appendix B: School documentation of intervention provided

### School Documentation of Intervention Provided

Completed by principal or designate in collaboration with staff

Student's Name:

Grade:

Parents/Caregiver Names:

Contact information:

Teacher:

Principal:

School:

Contact information for school:

School level assessment of concerns:

Concerns of staff/Information staff became aware of:

Is the student at risk of being sexually trafficked? YES NO

TO DO Checklist:

- ☐ Report to administration concern about student?
- ☐ Contact community service that provides child protection? (police community officer, Family Connexions)
- ☐ If safe to do so; Contact parent(s) or guardian (s) to inform them of the situation

#### INTERVENTION PLAN:

- ☐ Monitoring Only: Parent/guardian notified provided with referral information Canadian Human Trafficking Hotline, 1-833-900-1010
- ☐ Need for Additional Assessment: Child protection contacted
- ☐ Immediate Action: Child protection and police Contacted
- ☐ referral to Mental Health Lead

Principal/ Designate:

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Name of staff reporting information:

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Signatures: \_\_\_\_\_

Date: \_\_\_\_\_

## Appendix C: Actions to take

### When faced with a student experiencing a sexual abuse or sex trafficking crisis

- **Remain calm, be empathic and always take the student seriously.**
- **Listen.**
  - Acknowledge feelings and problems in the student's terms. Try to avoid complicated language.
  - Allow the student to express feelings.
  - Try to avoid giving advice or opinions.
- **Be honest.** Offer support, but do not offer condescending or unrealistic reassurance.
- **Know your limits.** If you feel overwhelmed, or if you feel uncomfortable, provide a safe, calm space until administrative or social work staff arrive.
- **Make sure that the student understands their privacy and confidentiality rights:**  
Explain the rights to privacy and confidentiality including limits staff have in maintaining confidentiality when a child is at risk of harm including risk of sex-trafficking or engaging in luring other youth into sex trafficking.
- **Take time to debrief** with Mental Health Lead to support your own safety and well-being.
- Use the Canadian Human Trafficking Hotline for resources and information, <https://www.canadianhumantraffickinghotline.ca>; 1-833-900-1010