



## ANTI-SEX TRAFFICKING

Responsibility:	<i>Superintendent, Student Achievement &amp; Well-Being</i>
Legal References:	<a href="#"><u>Education Act, Child, Youth and Family Services Act, Policy Program Memorandum 166</u></a>
Related References:	<i>Family &amp; Children's Services Protocol</i> <a href="#"><u>Provincial Anti-Sex Trafficking Resources</u></a> <a href="#"><u>PPM 9: Duty to Report Children in Need of Protection</u></a> <a href="#"><u>PPM 166: Keeping Students Safe: Policy Framework for School Board Anti-Sex Trafficking Protocols</u></a>
Effective:	<i>January 31, 2022</i>
Revisions:	
Reviewed:	<i>December 2022</i>

### 1. Preamble

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

This procedure and supporting 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.

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

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

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. Definitions

**Human trafficking:** The recruitment, transportation, harbouring and/or exercising control, direction or influence over the movements of a person in order to exploit that person, typically

through sexual exploitation (referred to as sex trafficking) or forced labour (referred to as labour trafficking).

**Sex trafficking:** A form of sexual exploitation and 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.

**Anti-sex trafficking protocols:** Strategies, processes and supports developed to detect, deter and report incidents of possible sex trafficking.

**2SLGBTQQIA:** 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.”

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

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

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

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

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

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

**Victim:** Used to refer to an individual who is in the process of being recruited or is being trafficked, whereas *survivor* is used to refer to an individual who has escaped a trafficking situation. The term victim is often used to refer to a child who has experienced sexual

exploitation. This approach is used for clarity and not intended to label or define an individual's experience. Individuals who have experienced sex trafficking may prefer one term over another in order to describe their experiences. School employees in the Waterloo Region District School Board (WRDSB) should confirm how an individual impacted by trafficking prefers to be referenced.

### 3. Application and Scope

This procedure is specifically created to prevent and respond to incidents related to sex trafficking. Students vulnerable to human trafficking would also be supported by the principles contained herein. This procedure applies to all students, employees and trustees of the WRDSB.

The procedure also covers parents/guardians, school council members, visitors, third party service providers, volunteers, permit holders, customers of the WRDSB and other members of organizations while partaking in any activities that occur on WRDSB premises or while engaging in WRDSB- or school-related activities, either in person or online.

Schools and school-related activities, such as extra-curricular activities, WRDSB-sponsored sporting events, WRDSB-operated before- and after-school programs and excursions comprising the learning and working environment fall within the scope of this procedure, as do WRDSB offices and facilities (including eating, lounge/changing areas and vehicles used for work purposes or on work property). Conferences, workshops, training sessions and staff functions also fall within the scope of this procedure.

### 4. Statement of Principles

4.1 In developing and implementing provisions related to anti-sex trafficking, the WRDSB will:

- a. Define a role for parents/guardians/caregivers through:
  - ensuring parents, guardians and caregivers are key partners;
  - ensuring care is 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);
  - ensuring outreach to Indigenous parents and guardians, as well as outreach to Black and racialized parents and guardians, is trauma-informed and recognizes historic, systemic, linguistic and/or cultural barriers that may impact participation.
- b. Foster student voices by:
  - supporting and empowering student groups to participate and inform the design, development, delivery and implementation of anti-sex trafficking provisions.
- c. Build multi-sectoral relationships with community organizations by:
  - consulting and engaging with culturally relevant and responsive community groups/agencies in developing and implementing anti-sex trafficking provisions in order to be responsive to the diverse needs of local school communities;
  - consulting and engaging with community organizations/agencies in developing educational materials to support staff training. Special attention will be paid to engage community organizations that support those whose identities place them at greater risk.
- d. Ensure interventions are safe by:
  - increasing protective factors and helping reduce risk factors associated with sex trafficking, through providing comprehensive anti-sex trafficking training to staff, which will include:
    - supporting early intervention through identification and appropriate response, including connecting impacted persons to supportive services;
    - identifying signs of human and sex trafficking;
    - safely responding to disclosures;
    - being culturally relevant and responsive to diverse student populations;
    - supporting the immediate physical and emotional safety needs of students.
- e. Build up school-based prevention through:

- understanding the social and historical context of sex trafficking and implementing prevention strategies that are responsive to the needs of the students and members of the local school community;
  - employing strategies that complement existing prevention efforts at WRDSB schools, including the teaching of consent, healthy relationships and healthy sexuality.
- f. Respect confidentiality, privacy and informed consent through:
- recognizing the WRDSB's obligations under provincial and federal laws to deal with each student individually, with respect, dignity, equity and due regard to confidentiality, privacy, and informed consent as per legal requirements, including those under the *Human Rights Code*, *Municipal Freedom of Information and Protection of Privacy Act*, *Accessibility for Ontarians with Disabilities Act*, *Education Act*, and *Child, Youth and Family Services Act*.
- g. Promote equitable and culturally safe responses through:
- implementing a human rights-based, non-judgemental, culturally responsive, survivor-centered and trauma-informed approach when raising awareness, preventing, identifying and responding to sex trafficking.

## 5. Strategies to Raise Awareness and Prevent Sex Trafficking

5.1 The WRDSB will employ culturally safe strategies to raise awareness about sex trafficking with students, employees, parents, caregivers and the broader school community. These strategies will include:

- a. Making the Anti-Sex Trafficking procedure and related resources publicly available and accessible on the WRDSB websites;
- b. Processes to raise awareness among parents and caregivers 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 (for example, through the WRDSB, community providers and/or support hotline);
- c. How individuals can report concerns to the WRDSB and the WRDSB's process for responding to concerns:
  - the process will include approaches to overcome barriers to participation that Indigenous, Black, newcomer and other parents/guardians may face;
- d. Processes in place to raise awareness among students of 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;
- e. Processes 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;
- f. 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 while using WRDSB-provided technology;
- g. Awareness strategies that may involve sending letters or emails, providing information in a student handbook, displaying posters, hosting information sessions, posting on the school/WRDSB social media accounts and/or posting information on the WRDSB website (e.g., posting phone number for the Canadian Human Trafficking Hotline to raise awareness about the supports and referrals it offers).

## 6. Response Procedures

6.1 The WRDSB will develop and implement related anti-sex trafficking protocols for WRDSB employees when responding to situations where a student:

- a. May be at risk of or is being sex trafficked

- b. May be targeting, luring, grooming or recruiting children and youth for the purpose of sex trafficking
- c. Is returning to school after they have been trafficked or involved in trafficking others

6.2 The related anti-sex trafficking protocols must be trauma-informed, culturally responsive and address the needs of:

- a. Students with special education needs, mental health needs, social or emotional needs, language/cultural barriers and international students
- b. Indigenous, Black or racialized students
- c. Students who identify as 2SLGBTQQIA+
- d. Students who are in care, receiving care or in customary care arrangements
- e. 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
- f. Parents, including those who may live overseas and/or may not speak English or French
- g. Students 18 years or older or who are 16 or 17 years old and have withdrawn from parental control

6.3 The WRDSB respects that legislation, namely the *Child, Youth and Family Services Act*, requires all staff and volunteers to report any concerns or suspicions with respect to the harming of children or youth, specifically as it pertains to this procedure at *section 125(1)(4) [Child, Youth and Family Services Act, 2017]*:

- 4.1 *The child has been sexually exploited as a result of being subjected to child sex trafficking.*
- 4.2 *There is a risk that the child is likely to be sexually exploited as a result of being subjected to child sex trafficking.*

## 7. Training for WRDSB Employees

Safe Schools staff at the WRDSB will be designated to support employees with anti-sex trafficking programs and strategies. This will include support with:

- a. 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;
- b. 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;
- c. 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 to support reintegration into school;
- d. 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 9: Duty to Report Children in Need of Protection*;
- e. Clear information on legislated privacy and confidentiality requirements when responding to a suspected or confirmed instance of sex trafficking;
- f. The process of notifying appropriate school/WRDSB contacts and parents/guardians, as applicable;
- g. Direction on the approach to referring all affected students (including those indirectly affected, as needed) to supports;
- h. Direction on the approach to responding to possible sex trafficking recruitment by a student within the school, including appropriate interventions, supports and/or consequences, as applicable;
- i. Expectations are to be consistent with the WRDSB's Safe and Accepting Schools Framework, including, but not limited to, AP 1200, 1260, 1270, 1280, 1290 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;
- j. Direction on the approach to appropriately respond to and meet the needs of students who are victims and survivors of sex trafficking, including access to education and facilitating school re-entry for those returning to school;
  - k. Direction on monitoring and following up on incidents reported (for example, check-ins with affected students);
  - l. Direction on documenting suspected or reported sex trafficking situations and response procedures that were implemented;
  - m. Information on culturally responsive and trauma-informed personal supports available to WRDSB employees when responding to sex trafficking situations.

The WRDSB will provide ongoing training for WRDSB employees, including teachers, administrators, and other school staff on anti-sex trafficking strategies. The training will consist of:

- a. Key definitions, common misconceptions and myths about sex trafficking, including tactics used for online luring, grooming and recruitment;
- b. 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;
- c. Information on protective factors and prevention-focused supports and resources;
- d. Information on risk factors and signs that a student is at risk, being lured, groomed or trafficked;
- e. Signs that a student is involved in luring, grooming or trafficking others;
- f. 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;
- g. Supports available to students and affected staff, including culturally responsive supports;
- h. Additional training resources to support staff to understand and safely respond to sex trafficking;
- i. Roles and responsibilities of employees in raising awareness, identifying and responding to sex trafficking.

The training will be tracked and will be available throughout the year to all new and existing WRDSB employees. The WRDSB will update the training program on an ongoing basis and deliver regularly to stay current with emerging issues relating to trafficking and changes in community services and response.

## **8. Ongoing Review and Assessment**

8.1 In collaboration with the Ministry of Education, anti-human trafficking partners and local agencies, such as Children's Aid Societies and Indigenous Child and Family Well-Being Agencies, and other school boards, the WRDSB will engage in ongoing review and assessment of interventions.

8.2 This review will monitor the effectiveness of training (e.g., 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 provisions in place respond to the needs of students (e.g., helped children and youth in care stay out of, or exit, human trafficking). This will be measured with performance indicators on how the provisions in place are preventing trafficking within school communities.

## **9. Other Documents**

APPENDIX A: [Duty to Report Protocol - Suspicion of Sex Trafficking](#)