

Topic:	Anti-Sex Trafficking
Effective:	February 2022
Cross-Reference:	Ontario Human Rights Code Education Act; Child Youth and Family Services Act, 2017 Accessibility for Ontarians with Disabilities Act, 2005 Municipal Freedom of Information and Protection of Privacy Act PPM 166 - Keeping Students Safe: Policy Framework for School Board Anti-Sex Trafficking Protocols Halton Region Anti-Sex Trafficking Protocol Safe and Accepting Schools Policy Child Abuse - Reporting Procedure Positive School Climate Administrative Procedure
Revision Date:	January 2022
Review Date:	February 2024
Responsibility:	Superintendent of Education, Safe Schools

INTENDED PURPOSE:

The *Policy/Program Memorandum 166 Keeping Students Safe: Policy Framework for School Board Anti-Sex Trafficking Protocols* (PPM166) sets a strong foundation to build local anti-sex trafficking procedures that align with all regional stakeholders.

This administrative procedure supports coordinated action by all stakeholders to prevent, identify and recognize sex trafficking and develop responses to facilitate early and appropriate intervention.

School environments that are inclusive and affirming of students' identities lead to welcoming and engaging student experiences. Families and communities must be intentionally involved in the students' achievement and well-being. Safe Schools, both physically and psychologically, are a critical element to successfully nurturing positive student experiences.

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.

1. 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. Although many individuals who are trafficked for the purpose of sexual exploitation are women and girls, trans persons, men, boys, gender variant and gender non-conforming individuals can also be targeted.

Indigenous and racialized individuals are 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.

2. Statement of principles**A. Foster student voices**

Students are at the centre of this work and should be involved in efforts to develop actions against sex trafficking. HDSB must invite student groups to participate and inform the design, development, delivery, implementation and monitoring of anti-sex trafficking procedures. Recognizing 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.

B. Engage parents/guardians/caregivers

Parents, guardians and caregivers are key partners in the development, implementation and review of anti-sex trafficking procedures. 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 ensure that engagement with parents, guardians and caregivers is culturally and linguistically responsive.

C. 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.

The following is a list of community groups/agencies that may be involved in this ongoing work:

<ul style="list-style-type: none"> ● Big Brothers Big Sisters of Halton ● Community Living ● Crime Stoppers ● Diocese of Hamilton ● Elizabeth Fry ● Enahtig ● Grandmother's Voice ● Halton ADAPT ● Halton Black Voices ● Halton CAS ● Halton Women's Place ● Indus Community Services ● Interfaith Council of Halton 	<ul style="list-style-type: none"> ● Halton Islamic Association ● Halton Regional Police (HRPS) ● HDSB Parent Involvement Committee (PIC) ● One Child ● Punjabi Community Health Center (PCHS) ● Reach out Center for Kids Halton (ROCK) ● ROCK Positive Space Network 	<ul style="list-style-type: none"> ● Mississaugas of the Credit First Nation ● Roots Community Services Inc. ● Special Education Advisory Council (SEAC) ● Sexual Assault & Violence Intervention Services (SAVIS) ● Student Senate & Student Trustees ● HDSB Welcome Centre
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D. Promote equitable and culturally safe responses

The HDSB embraces a human rights-based, non-judgmental, culturally responsive, survivor-centered and trauma-informed approach to raising awareness, preventing, identifying and responding to sex trafficking.

E. Respect confidentiality, privacy and informed consent

This procedure respects confidentiality and ensures 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.

F. Ensure safe interventions

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. 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. School based employees require annual 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 emphasizes how to respond to immediate dangers and the need to avoid actions that will make an individual's situation worse or more unsafe.

This procedure complements existing prevention efforts in schools, including the teaching of consent, healthy relationships and healthy sexuality. It is important for school staff to understand the historical and social context of sex trafficking and implement prevention strategies that are responsive to the needs of students and members of the local school community.

This procedure applies to in-person and online learning and includes all school and school board activities, including field trips, overnight excursions, board-sponsored sporting events and board-operated before- and after-school programs. This extends to all cases of nexus to the school community.

3. Strategies to raise awareness and prevent sex trafficking

Halton utilizes culturally responsive and safe strategies to raise awareness about sex trafficking with students, school board employees, parents, caregivers and the broader school community.

Strategies will include

- Ensure approaches to overcome barriers to participation that First Nations, Métis and Inuit, as well as historically excluded and/or low-income parent/guardian communities may face are inclusive and culturally and linguistically responsive.
- Raise awareness amongst staff and students 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. The process should allow for concerns to be brought forward anonymously.
- Raise awareness to prevent the 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.
- 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; how to get help safely (for example, through the school board, community providers and/or support hotline)
 - how they can report concerns to the school board (including anonymous reporting) and the school board's process for responding to concerns
- Utilize available technology and tools to raise awareness, 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.

[The Canadian Human Trafficking Hotline](#) is available to support awareness and referrals.

4. Response procedures

When an educator or administrator receives a disclosure or suspects human trafficking staff will:

Remember making a disclosure is a highly vulnerable experience	<ul style="list-style-type: none"> ● Listen to the student without judgement. ● The response of staff needs to be centered on student voice and will need to be centered on the student; ● Consider your bias: avoid projecting your own feelings; strive to understand the choices a student has made, the barriers they experience, and empathize with their current situation. ● Be aware of and soften your body language. ● Mirror their language e.g., if they say “boyfriend,” use this term. ● Let them take the lead in sharing, avoid leading the conversation (do not probe for their story, instead listen respectfully, provide support). ● Avoid making promises you aren’t able to keep (e.g. assurance of confidentiality). Assure the student that their safety is a priority.
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Educator -- If an educator receives a disclosure or suspects human trafficking.

Keep the student safe	<p>*Always make the student aware that you are obliged to disclose any information regarding illegal activity with your administrator and possibly the police and CAS Halton</p> <ul style="list-style-type: none"> ● Be aware that a threat to their safety may be imminent and an immediate response and intervention is required. ● Do not leave the student alone.
Explain your role	<ul style="list-style-type: none"> ● Explain that your role in supporting the student is to connect them with professionals who can help respond to the concern they have shared with you. These roles include: <ol style="list-style-type: none"> a) reporting to the school administration; b) the duty to report child protection concerns; c) contact social work, child and youth counsellor for support or trauma specialist; d) if the student identifies you as a key support, and the administrator determines this is appropriate, offering to be present in subsequent conversations between the student, administration, school social worker and community partners engaged in the response; e) in conjunction with administration, engaging appropriate school board partners, including school board staff (Social Worker, CYC), to create a safety plan with the student and refer them to resources
CAS Halton – Duty to Report	<ul style="list-style-type: none"> ● CAS Halton - Duty to Report <ol style="list-style-type: none"> a) For students under 16 years of age, staff MUST report to the administrator and a child protection agency; b) For students 16 and 17 years of age, staff MUST report to the administrator and may report to CAS Halton. <p>See Child Abuse Reporting Administrative Procedure.</p>
Contact School Admin	<ul style="list-style-type: none"> ● Immediately contact your school administrator regardless of the age of the student.

Administrator: If an administrator receives a disclosure or suspects human trafficking.

Keep the student safe	<p>*Always make the student aware that you may be obliged to disclose any information regarding illegal activity with the police and CAS Halton</p> <ul style="list-style-type: none"> ● Ensure the student remains supervised by school staff. ● Ensure the student is not being re-victimized by having them repeat their story.
CAS Halton – Duty to Report	<ul style="list-style-type: none"> ● If you received the disclosure or suspect human trafficking, call CAS Halton at 905 333 4441. ● If a staff member received the disclosure or suspects human trafficking, verify staff has called child protection agency. <ul style="list-style-type: none"> ○ Students under 16 years: Verify that staff who received the disclosure has called a CAS Halton and provided you documentation, or call the child protection agency if disclosure is made to you. ○ Student 16 and 17 years: Verify whether the staff who received the disclosure has contacted a CAS Halton and provided you documentation. Record the decision to call CAS Halton and contact your Superintendent for further consultation if the decision is made not to call. ● Contact board staff responsible for Social Work Services for child protection questions.
HDSB Supports	<ul style="list-style-type: none"> ● Call Safe Schools Department and or Superintendent; ● Engage in consultation with the Safe Schools System Principal; ● Arrange for a safe school social worker consultation and resources.
Parent/Guardian Contact	<ul style="list-style-type: none"> ● Call parent/guardian prior to the police meeting with the student, except if: <ul style="list-style-type: none"> ○ Directed not to contact parent/guardian by child protection agency or local police; ○ Student is 18 years or older; ○ Student is 16 or 17 and has withdrawn from parental control; ● Following Board procedure for circumstances when parents are not contacted, as noted in Positive School Climate Administrative Procedure.
Contact Police	<p>Suspected Case - Consultation Options</p> <ul style="list-style-type: none"> ● Follow guidance in Halton Region Police Board Protocol ● Call Halton Regional Police - (905) 827- 4777 <p>Disclosure - Response Requirements Follow Police and School Board Protocol.</p>
Human Trafficking Hotline (Optional Additional Support)	<p>National human trafficking hotline at 1-833-900-1010 It connects victims and survivors of human trafficking to law enforcement, emergency shelters, transition housing, long-term supports, counselors, and a range of other trauma-informed services. Services offered in 200+ languages and are accessible to the deaf, hard-of-hearing and non-verbal.</p>

Human Trafficking Services and Supports in Ontario	A list of dedicated services and supports across Ontario that help victims, survivors and persons at risk of human trafficking can be accessed here: https://www.ontario.ca/page/human-trafficking-services-and-supports
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5. Annual Training for school-based employees

Each year all school-based staff will participate in training that includes the following content:

- key definitions, common misconceptions and myths about sex trafficking, including tactics used for online luring, grooming and recruitment
- learning about human rights-based and trauma-informed approaches to combatting sex trafficking, responsive to First Nations, Métis and Inuit cultural competencies, and the needs of low-income communities within anti-oppressive, anti-racist, equitable and gender-based frameworks
- 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
- support 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

Training may vary for audience needs and depth and level of intensity and specificity.

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

Appendix: Glossary of Terms

2S&LGBTQQIA: 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 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”

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.