
**MOOSE FACTORY ISLAND
DISTRICT SCHOOL AREA BOARD**

ADMINISTRATIVE PROCEDURE NO. 155	
Effective	January 10, 2023
Revision Date	

**KEEPING STUDENTS SAFE:
ANTI-SEX TRAFFICKING PROTOCOL**

PURPOSE

This administrative procedure of the Moose Factory Island District School Area Board supports implementation of the Ministry of Education's Policy/Program Memorandum (PPM) 166: Keeping Students Safe: Policy Framework for School Board Anti-Sex Trafficking Protocols.

It is intended to keep students safe from sexual exploitation and sex trafficking and to support staff members in providing a safe, nurturing, learning environment. Keeping students safe involves the development and implementation of anti-sex trafficking programs that seek to identify, recognize, and prevent sex trafficking and to develop responses to facilitate early and appropriate intervention.

DEFINITIONS

Sex Trafficking: Sex trafficking refers to a form of sexual exploitation and is a crime under the *Criminal Code of Canada*. It can include recruiting, sheltering, concealing, 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 anyone may be targeted.

Survivor: Survivor refers to an individual who has escaped a trafficking situation, while "victim" is used to refer to an individual who is in the process of being recruited or is being trafficked. The term victim is often used to refer to a child who has experienced sexual exploitation. This approach is used for clarity and is 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.

Tactics: Tactics refers to methods traffickers may use to target, recruit, manipulate, and coerce victims. This often involves targeting an individual's vulnerabilities, then luring, grooming, isolating, manipulating, controlling, and exploiting a victim to 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: Trauma-informed approaches refer to practices that recognize the connections among 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.

PROTOCOL

1. Responsibility

The overall responsibility for the implementation of this administrative procedure lies with Board's administrator and treasurer, while the responsibility for day-to-day management and coordination is assigned to the school principal.

2. Application

This procedure applies to everyone who engages in any Board or school-related activities. It applies to all school and Board activities, including field trips, overnight excursions, Board-sponsored sporting events and Board-operated before and after-school programs.

3. Guiding Principles

3.1. The Moose Factory Island District School Area Board recognizes the urgency of addressing the problem of sex trafficking. Human trafficking is one of the fastest growing and most lucrative crimes worldwide, and school-aged children and youth are prime targets for traffickers. Students who are most at risk are Indigenous and Black children and youth in care, as well as lesbian, gay, bisexual, transgender students and those with disabilities.

3.2. In developing and implementing programs related to anti-sex trafficking, the Board will:

3.2.1. define a role for parents/guardians/caregivers through:

- a) ensuring parents, guardians, and caregivers are key partners;
- b) ensuring care is given when reaching out to parents, families, and caregivers to confirm they are safe adults prior to engaging with them on matters regarding the student/s;
- c) ensuring outreach to Indigenous parents and guardians, as well as outreach to Black and racialized parents and guardians; and
- d) ensuring that programs are trauma-informed and recognize historic, systemic, linguistic, and/or cultural barriers that may impact participation.

3.2.2. foster student voices by supporting and empowering students to participate as age-appropriate in developing anti-sex trafficking provisions.

- 3.2.3. 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.
- 3.2.4. 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:
- a) supporting early intervention through identification and appropriate responses, including connecting impacted persons to supportive services;
 - b) identifying signs of human and sex trafficking;
 - c) safely responding to disclosures;
 - d) being culturally relevant and responsive to diverse student populations; and
 - e) supporting the immediate physical and emotional safety needs of students.
- 3.2.5. build up school-based prevention through:
- a) understanding the social and historical context of sex trafficking;
 - b) implementing prevention strategies that are responsive to the needs of the students and members of the local school community; and
 - c) employing strategies that complement existing prevention efforts at Ministik School, including the teaching of consent, healthy relationships, and healthy sexuality. [The Ontario Health and Physical Education curriculum for Grades 1 to 8, 2019.]
- 3.2.6. respect confidentiality, privacy, and informed consent by recognizing the Board's obligations under provincial and federal laws to deal with each student individually, with respect, dignity, and equity as per legal requirements, including those under the *Human Rights Code*, *Municipal Freedom of Information and Protection of Privacy Act*; *the Accessibility for Ontarians with Disabilities Act, 2005*; *Education Act*; and *the Child, Youth and Family Services Act, 2017*.
- 3.2.7. 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.

4. Employing a Multi-Sector Approach

- 4.1. In order to support a coordinated response, Moose Factory Island District School Area Board's anti-sex trafficking protocol will be developed in collaboration and partnerships with Indigenous organizations, the local Children's Aid Society, victim services, police services, and other community-based service providers.
- 4.2. The Board will develop a culturally safe and equitable approach related to the anti-sex trafficking protocol to protect the school community from trafficking.
- 4.3. The local Children's Aid Society must be notified when a child, 17 years and under, is at risk and in need of protection with concerns about sex trafficking.

5. Strategies to Raise Awareness and Prevent Sex Trafficking

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

- a) making this protocol and related administrative procedures and resources publicly available and accessible;
- b) raising 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 Board, community providers, and/or a support hotline);
- c) communicating how individuals can report concerns to the Board, including anonymous reporting, and the Board's process for responding to concerns, including ways to overcome barriers to participation that some students and families may face;
- d) raising awareness among students about 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 existing sex trafficking to the school without fear of reprisal;
- e) raising awareness among students will occur in both in-person and online learning;
- f) helping to 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;
- g) using available technology 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; and
- h) using awareness strategies such as sending letters or emails, providing information in a student handbook, displaying posters, hosting information sessions, and/or posting information on the Board website (e.g., posting the phone number for the Canadian Human Trafficking Hotline to raise awareness about the supports and referrals it offers).

6. Response Procedures

6.1. The Board will develop and implement anti-sex trafficking procedures for staff members who are 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; or
- c) is returning to school after they have been trafficked or involved in trafficking others.

6.2. The anti-sex trafficking procedures must be trauma-informed and culturally responsive and address the needs of all students, including those with special education needs, mental health needs, social or emotional needs or language/cultural barriers.

7. Support and Training for the Staff

7.1. The Board will provide ongoing training for the staff on anti-sex trafficking strategies, including awareness about the students who are most at risk.

7.2. The training will include support in 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.

7.3. Staff will be assisted with 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.

7.4. Staff will also be supported with the process for responding to and supporting a student 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 re-integration into school.

7.5. The staff will also receive guidance regarding:

- a) 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;
- b) legislated privacy and confidentiality requirements when responding to a suspected or confirmed instance of sex trafficking;
- c) the process of notifying designated school and Board contacts and parents/guardians, as applicable;
- d) the approach to referring all affected students to ongoing supports;
- e) direction on documenting suspected or reported sex trafficking situations and response procedures that were implemented; and

- f) the culturally responsive and trauma-informed personal supports available to staff members who have responded to sex trafficking situations.

8. Accountability and Evaluation

- 8.1. The Board will monitor the effectiveness of training, to evaluate whether staff members 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.
- 8.2. Staff members will evaluate whether the protocol responds to the needs of students.
- 8.3. Community partners and local agencies, including child protective services like the Children's Aid Society and Indigenous Child and Family Well-Being Agency, will be invited to participate in determining how the protocol has helped children and youth in care stay out of, or exit, human trafficking.
- 8.4. The Board will review this procedure at least every five years.

REFERENCE DOCUMENTS

Legal References:

Ontario Human Rights Code

Criminal Code of Canada

Child, Youth and Family Services Act, 2017

Protecting Students Act, 2013

Accessibility for Ontarians with Disabilities Act, 2005

Municipal Freedom of Information and Protection of Privacy Act

Education Act, section 169.1 Board duty to promote student well-being

Policy/Program Memorandum 166: Keeping Students Safe: Policy Framework for School Board Anti-Sex Trafficking Protocols

Policy/Program Memorandum 9: Duty to Report Children in Need of Protection

Health and Physical Education curriculum for Grades 1 to 8, 2019

Board References:

Board Policy GOV-01 Vision, Mission, and Values

Board Policy GOV-04 Role of the Supervisory Officer

Board Policy GOV-07 Learning and Working Environment: Equity and Inclusion

Board Policy GOV-08 Learning and Working Environment: Safe Schools

Board Policy GOV-11 Parent and Community Relations

Administrative Procedure 147 Staff and Student Use of the Internet

Administrative Procedure 151 Accessibility Standards and Practices

Administrative Procedure 240 Special Education

Administrative Procedure 325 Reporting Child Abuse

Administrative Procedure 390 Police/ School Board Protocol

Resources:

Ontario's Anti-Human Trafficking Strategy 2020-2025. [Ontario's anti-human trafficking strategy 2020-2025 | Ontario.ca](#)

Ministry of Children, Community and Social Services. (2021) *Human Trafficking: Foundational Information for School Boards and School Board Staff*

Council of Ontario Directors of Education. (2021) *Multi-Sectoral Collaboration in the Education Sector: A Resource for Developing School Board Anti-Sex Trafficking Protocols*