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.

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[[1]](#footnote-1).

Welcoming and engaging school environments lead to positive student experiences, especially when families and communities are intentionally involved in the students’ learning[[2]](#footnote-2). 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 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.

This protocol is created on behalf of the City of Greater Sudbury and Districts school boards and community partners. We recognize we all have a duty in combatting sex trafficking and by having a community protocol we have created a common response protocol for our communities.

The protocol partners are: Conseil Scolaire Catholique Novelon, Conseil scolaire public du Grand Nord de l’Ontario, Rainbow District School Board, and the Sudbury Catholic District School Board, Greater Sudbury Police Services, Ontario Provincial Police, Sudbury and Area Victim Services with future partnerships evolving. All partners are accountable to the protocol and have a shared obligation to respond to incidents of human trafficking. As part of the implementation of the protocol, partners commit to ongoing participation in the process and to staff development.

More specific procedures, as they apply to each School Board, will be reflected in their own administrative guidelines.

**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 individual who are trafficked for the purpose of sexual exploitation are women and girls, but all people may 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 in Canada 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. 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.

**Greater Sudbury Police Services or the Ontario Provincial Police (OPP) Responsibilities**

The Greater Sudbury Police Services and the OPP (if outside the City of Greater Sudbury) have the responsibility to investigate incidents of sex trafficking as human trafficking is a criminal offence that involves the exploitation of a person through force, coercion, threat, fraud, or deception, for the financial gain of the exploiter. Officers help victims escape these violent crimes and bring offenders to justice. When a school has information that a student is part of sex trafficking one of the first steps to take is calling the police as it is their responsibility to investigate the crime.

In an Emergency call 911

For Non-Emergent situations:

Greater Sudbury Police Service 705-675-9171

OPP: 1-888-310-1122

The police then will investigate.

**Sudbury and Area Victim Services**

Their primary goal is to ensure that victimized persons receive immediate intervention, support and assistance with regard to their primary needs. This includes providing assistance of a compassionate nature, provision of appropriate referrals, and maintaining positive police and community partnerships.

To access services please call 705-522-6970. Self-referrals are accepted.

Sudbury and Area Victim Services also helps with professional development for staff to learn about sex trafficking: the signs and how to help. Sudbury and Area Victim Services will provide written materials as well as offer in person presentations to schools (staff, students and school community) within the boards surrounding sex trafficking.

**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. Please see **Appendix F** for a list of community organizations.

**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**

This protocol 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.

**Respect confidentiality, privacy and informed consent**

All procedures respect confidentiality and ensure that the student fully understands how their information may be used or with whom it may be shared. *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**

Within each school board we strive to 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**

All strategies used in schools must be culturally safe strategies to raise awareness about sex trafficking with students, school board employees, parents, caregivers and the broader school community. This protocol 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.

Strategies include:

* The protocol and related procedures and resources are available publicly and accessible on each of the four school board websites.
* Schools will raise awareness (virtually or in-person) among students, 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
  + approaches to overcome barriers to participation that Indigenous, Black, newcomer and other parents/guardians may face
  + 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.
  + **Appendix C** lists some helpful resources
* Lesson Plans – staff are reminded that when appropriate, this topic fits with curriculum-based learning about healthy relationships, consent, mental health and well-being, coping skills, personal safety and online safety.
  + **Appendix A** lists curriculum connections
* The use of school board-provided technology in sex trafficking and other online threats are strictly prohibited. Each school board has administrative guidelines that all adults and students must following. Please refer to each school board for their guidelines.

Awareness strategies could 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. Schools may want to include the phone number for the [Canadian Human Trafficking Hotline](https://www.canadianhumantraffickinghotline.ca/) [1-833-900-1010](tel:18339001010) to raise awareness about the supports and referrals it offers. Sudbury and Area Victim Services holds funding for some of these endeavours and will provide supports to the school boards in the language of choice.

**Response procedures**

If a school board employee suspects 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

Then the following response procedures should be followed (see **Appendix D** for a flow chart)

Response procedures must be trauma-informed and culturally responsive and, at minimum, include the following elements:

* Along with the school principal the School Board Mental Health Lead is a designated contact person who is familiar with the school board anti-sex trafficking protocol and can support school board employees with response procedures.
  + They will assist with:
    - 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.
    - 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.
    - 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 re-integration into school.
* All employees must follow the duty to report a child in need of protection under Section 125(1) of the [*Child, Youth and Family Services Act, 2017*](https://www.ontario.ca/laws/statute/17c14) and under [*Policy/Program Memorandum 9: Duty to Report Children in Need of Protection*](https://www.ontario.ca/document/education-ontario-policy-and-program-direction/policyprogram-memorandum-9). Please see each board’s individual guideline for reporting.
* Along with notifying children protection and police and Sudbury and Area Victim Services the school should notify the Mental Health Lead in order to activate school board mental health services.
* If the child/youth is still under the legal care of their family/guardian, then they will also be notified.
* School administrators, in consultation with the Board Mental Health Lead, will communicate and collaborate with community-based service providers, local police services, Sudbury and Area Victim 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.
* All affected students (including those indirectly affected, as needed) should be referred to mental health services. These include both school based and community based services. All services are voluntary.
* School administrators will continue to follow the Code of Conduct and Progressive Discipline when responding to possible sex trafficking recruitment by a student within the school, including appropriate interventions, supports and/or consequences, as applicable. Expectations are 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. Please see **Appendix E** for Administrator Procedures
* It is vital that schools appropriately respond to and meet the needs of students who are victims and survivors of sex trafficking. This includes access to education and facilitating a barrier free school re-entry for those returning to school.
* Appropriate school staff including mental health staff should monitoring and follow-up on incidents reported (for example, check-ins with affected students).
* Staff will document all suspected and/or reported sex trafficking situations and response procedures that were implemented.
* Schools are reminded that there are culturally responsive and trauma-informed personal supports available to help with responding to sex trafficking situations.

Resources include:

In an Emergency call 911

Greater Sudbury Police Service 705-675-9171

Sudbury and Area Victim Services (SAVS) at 705-522-6970

Sudbury Women’s Centre (SWC) (705) 673-1916

Human Trafficking Hotline 1-833-900-1010

See **Appendix F** for other organizations

*Special Note are those:*

* *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*

**Training for school board employees**

Ongoing training for school board employees, including teachers, administrators, and other school staff needs to occur. Through training staff will be made aware of:

* 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
* See **Appendix B** for other topics

The training should be made available throughout the year to all new and existing school board employees and all completed training documented. This training is available through each board’s eLearning environment or through other means. The modules should be updated and delivered regularly to stay current with emerging issues relating to trafficking and changes in community services and response.

**Measuring success: accountability and evaluation**

The protocol is reviewed, at minimum, every five years, or as part of the regular policy/administrative review cycle – whichever is the shorter period.

Community anti-human trafficking partners and local agencies, such as child protective services like Children's Aid Societies and Indigenous Child and Family Well-Being Agencies and Sudbury and Area Victim Services, will be invited to participate in the reporting process to the Ministry of Education when required, in collaboration with the school board, to determine how the protocols have helped children and youth in care stay out of, or exit, human trafficking.

Please see **Appendix G** for a glossary of terms

1. In response to: [Legislative Assembly of Ontario, Private members' motions](https://www.ola.org/en/legislative-business/status-business/private-members-motions), 42nd  Parliament, 1st  Session, Motion 122 voted and carried on December 3, 2020. [↑](#footnote-ref-1)
2. Ministry of Education. (2021). [Parent Engagement: Encouraging Parent Involvement in Schools](http://www.edu.gov.on.ca/eng/parents/involvement/). [↑](#footnote-ref-2)