



BOARD ADMINISTRATIVE PROCEDURE	
<i>Administrative Procedure</i> Anti-Sex Trafficking Protocol	<i>Administrative Procedure Number</i> 907
<i>Directional Policy</i> 900 - Safe and Accepting Schools	

Title of Administrative Procedure:

Anti-Sex Trafficking Protocol

Date Approved:

May 2022

Projected Review Date:

May 2027

Directional Policy Alignment:

This Administrative Procedure aligns with the Safe and Accepting Schools Directional Policy - 900 by ensuring our schools are welcoming, safe, respectful, equitable, inclusive and accepting learning and teaching environments, rooted in the teachings of the Gospel.

Alignment with Multi-Year Strategic Plan:

The Anti-Sex Trafficking Administrative Procedure supports the Board's Mission to educate students in faith-filled, loving, safe, inclusive schools to develop the God-given abilities of each person. This Administrative Procedure aligns with the Board's Multi-Year Strategic Plan to Value Relationships, Nurture Mental Health and Well-Being and to Ensure Equity. Moreover, this Administrative Procedure supports the development of welcoming and engaging school environments that respect the dignity of all students and nurture positive student experiences.

[PVNCCDSB Board Vision, Mission and Strategic Priorities](#)

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.

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.

Welcoming and engaging school environments lead to positive student experiences, especially when families and communities are intentionally involved in the students' learning. Safe, accepting and inclusive 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.

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 individuals 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 and racialized individuals.

Statement of Principles:**a) A role for parents/guardians/caregivers**

Parents, guardians and caregivers are key partners in the implementation 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, will be trauma-informed and recognize historic and systemic barriers that may impact their participation. Every effort will be made to reduce cultural and/or linguistic barriers when reaching out to parents, guardians and caregivers about this work. Parents, guardians and caregivers will be invited to participate in opportunities to increase awareness of the signs and protective factors of sex trafficking in order to support prevention and response.

b) Foster student voices

Students are at the centre of this work and will be involved in efforts to develop actions against sex trafficking. Student groups will be invited to review, improve and implement the Board's anti-sex trafficking protocols. PVNCCDSB recognizes 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.

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 Peterborough Victoria Northumberland and Clarington Catholic District School Board has connected with a number of agencies, either directly or indirectly, while developing this protocol. The Board agrees to continue seeking the guidance, input, and support of these organizations and agencies while the protocol is being implemented.

d) 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.

PVNCCDSB employees will participate in 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 will emphasize how to respond to immediate dangers and the need to avoid actions that will make an individual's situation worse or more unsafe.

e) Build up school-based prevention

PVNCCDSB's Administrative Procedure will complement existing prevention efforts in schools, including the teaching of consent, healthy relationships, healthy sexuality and the dignity of the human person through our Religion, Family Life and Health Education curriculum.

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.

f) Respect confidentiality, privacy and informed consent

The development of procedures within PVNCCDSB 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 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*.

g) Promote equitable and culturally safe responses

PVNCCDSB is committed to developing a human rights-based, non-judgmental, culturally responsive, survivor-centered and trauma-informed approach to raising awareness of, preventing, identifying and responding to sex trafficking.

Action Required:**1.0 STRATEGIES TO RAISE AWARENESS AND PREVENT SEX TRAFFICKING**

- 1.1 PVNCCDSB will employ culturally safe strategies to raise awareness about sex trafficking with students, school board employees, parents, caregivers and the broader community.
- 1.2 The Anti-Sex Trafficking Administrative Procedure and related procedures and resources will be publically available on the PVNCCDSB website so that it is accessible to parents/guardians/caregivers, students, staff and the broader community.
- 1.3 The strategies outlined will apply to all learning environments, including in person learning as well as virtual learning. The strategies will also apply to all

school and school board activities, including field trips, overnight excursions, and board-sponsored events.

- 1.4 Partnerships with community based agencies and groups, including Indigenous partners, will support PVNCCDSB with the development and delivery of prevention strategies and supports.

1.5 Considerations for Awareness Strategies

Awareness strategies for all groups may include 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 and resources on the school board website.

1.6 Strategies for Parents and Caregivers

PVNCCDSB will consult with its Catholic Parent Engagement Committee (CPEC) and/or school based Catholic School Councils to generate parent input and discuss how best to raise awareness regarding anti-sex trafficking for parents and caregivers.

Awareness and prevention activities for parents will focus on the following key areas:

- a) Cyber-Safety
- b) Signs a student is being targeted, lured, groomed, trafficked or is trafficking another student and how to get help safely
- c) How to report concerns to the Board (including anonymous reporting) and the Board's process for responding to concerns
- d) Approaches will be in place to overcome barriers to participation that Indigenous, Black and other racialized groups, newcomer and other parents/guardians may face.

1.7 Strategies for Students

PVNCCDSB will consult with student leadership teams (student government, student councils, applicable clubs, etc.) to generate input and consider student voice on raising student awareness strategies.

Awareness and prevention strategies for students will focus on the following key areas:

- a) raising awareness among 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 processes developed will allow for concerns to be brought forward anonymously.

- b) process 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.
- c) 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 school board-provided technology.

2.0 RESPONSE PROCEDURES

2.1 The Peterborough, Victoria, Northumberland and Clarington Catholic District School Board recognizes the importance of establishing procedures for school board employees to respond in 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.

2.2 Response procedures must be trauma-informed and culturally responsive and must address the needs of, among others:

- a) students with special education needs, mental health needs, social or emotional needs or language/cultural barriers, and international students;
- b) students who are in care, receiving care or in customary care arrangements;
- c) 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;
- d) parents, including those who may live overseas and/or may not speak English or French;
- e) students 18 years or older or who are 16 or 17 years old and have withdrawn from parental control.

2.3 It is the expectation and responsibility of all PVNCCDSB employees to respond to all incidents of suspicions and disclosures of sex trafficking in accordance with the PVNCCDSB Anti-Sex Trafficking Response Guide.

3.0 TRAINING FOR SCHOOL BOARD EMPLOYEES

- 3.1 All new and existing employees of the Peterborough, Victoria, Northumberland and Clarington Catholic District School Board will engage in training related to anti-sex trafficking. This training will be responsive to the varying roles of Board employees in order to ensure all employees understand their role in ensuring student safety. Training will be developed in consultation with community groups/agencies who have expertise in this area.
- 3.2 A tracking system will be used to ensure the completion of training modules and employees will be warned in advance about the content of this training in case it triggers those who have had a related traumatic experience.
- 3.3 Training will be updated and delivered regularly so that employees stay current with emerging issues related to trafficking and any changes in our response procedures.
- 3.4 Employee training shall include:
 - 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 or 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 school board employees in raising awareness, identifying and responding to sex trafficking

4.0 MEASURING SUCCESS: ACCOUNTABILITY AND EVALUATION

- 4.1 In collaboration with the Ministry of Education, community groups and agencies such as Children's Aid Societies and Indigenous Child and Family Well-Being Agencies, and other school boards, PVNCCDSB will develop a performance measurement framework.
- 4.2 This framework will monitor the effectiveness of training and whether the protocols and response guides put in place respond to the needs of students. This will be measured with performance indicators on how the provisions in place are preventing trafficking within school communities.

Responsibilities:

The Board of Trustees is responsible for:

- Ensuring alignment of this Administrative Procedure with the Safe and Accepting Schools Directional Policy
- Reviewing the Anti-Sex Trafficking Administrative Procedure as part of its regular policy and procedure review cycle.

The Director of Education is responsible for:

- Providing leadership and designating resources to ensure implementation and compliance with this Administrative Procedure.

Superintendents of Education are responsible for:

- Supporting principals and other employees for whom they have supervisory responsibility with the implementation and compliance with the procedures and requirements under this Administrative Procedure and related protocols.
- Ensuring that opportunities and resources are available for Board staff to acquire awareness, knowledge, skills, attitudes, and supports necessary to address situations involving student sex trafficking.
- Reviewing this Administrative Procedure and related protocols in consultation with students, teachers/support staff, principals, board staff, parents/guardians, school councils, Board Committees and other community groups.

Principals and Vice-Principals are responsible for:

- Implementing this Administrative Procedure in accordance with the parameters outlined.
- Ensuring all staff are trained in being able to detect the signs that a student is being targeted, lured, groomed, trafficked or is trafficking another student and how to get help safely.

- Fostering student voices and raise awareness among 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 with a process that allows concerns to be brought forward anonymously.
- Communicating with the Catholic School Council about the programs and strategies which foster a safe, inclusive and accepting school learning environment.
- Responding to all incidents of suspicions or disclosures of sex trafficking in accordance with the established Response Protocols.
- Responding to, and meeting the needs of, students who are victims and survivors of sex trafficking including access to education, facilitating school re-entry, and monitoring those students affected.
- Responding to, and meeting the needs of, 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.
- Debriefing sex-trafficking incidents with staff involved as outlined in the Debrief Guidelines.

Board employees are responsible for:

- Ensuring they are knowledgeable about the requirements and parameters outlined in this Administrative Procedure and related protocols.
- Participating in established professional development and training as required in this Administrative Procedure
- Responding to and reporting all incidents of suspicions or disclosures of sex trafficking to the principal in accordance with established Response Protocols,
- Use teaching and learning practices to help prevent recruitment of students for sex trafficking, including through culturally competent and responsive 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.

Students are responsible for:

- Abiding by the standards of behaviour outlined in Board policies and Code of Conduct and Provincial Code of Conduct
- Reporting all incidents of suspicions or disclosures of sex trafficking to a caring adult.
- Contributing to a positive school climate through healthy relationships and positive interactions with all members of the school community.
- Participating and engaging in programs and programs which support a safe school environment.

Parents, Guardians and Caregivers are responsible for:

- Encouraging and modeling healthy relationships and interactions with others which support a positive teaching and learning environment
- Supporting their child in developing healthy relationships and interactions with others
- Being informed about the signs of a potential sex-trafficking occurrence
- Reporting all incidents or suspicions of sex-trafficking to the Principal
- Collaborating with the school in order to support their child with the necessary wraparound supports required when a suspicion or disclosure occurs.

Catholic School Councils are responsible for:

- Providing input during the review of the Anti-Sex Trafficking Administrative Procedure
- Collaborating with the Principal to provide opportunities to parents/guardians to raise awareness in the detection and prevention of sex trafficking.

Progress Indicators:

- Employee Training completion data
- Qualitative and quantitative feedback from employee training sessions on effectiveness of training provided
- Qualitative and quantitative feedback from parent/community awareness sessions

Definitions:

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 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.

References:

- Ministry of Education Policy/Program Memorandum (PPM):
 - [119](#) - Developing and implementing equity and inclusive education policies in Ontario schools, 2013
 - [128](#) - Provincial Code of Conduct and School Board Codes of Conduct, 2019
 - [144](#) - Bullying Prevention and Intervention, 2021
 - [145](#) - Progressive Discipline and Promoting Positive Student Behaviour, 2018
 - [166](#) - Keeping Students Safe: Policy Framework for School Board Anti-Sex Trafficking Protocols
- [Municipal Freedom of Information and Protection of Privacy Act](#)
- [Ontario First Nation, Métis, and Inuit Education Policy Framework, 2007](#)
- [Accessibility for Ontarians with Disabilities Act, 2005](#)
- [Education Act](#)
- [Child, Youth and Family Services Act, 2017](#)
- [Ontario Human Rights Code](#)
- [Ontario Regulation 298](#)
- [Ontario Regulation 440/20](#)
- [Ontario Regulation 472/07](#)
- [Police/School Board Protocol, 2016](#)
- [CAS Joint Protocol, 2019](#)

RELATED DIRECTIONAL POLICIES AND ADMINISTRATIVE PROCEDURES

- PVNCCDSB [Directional Policy 700 - Equity and Inclusive Education](#)
- PVNCCDSB [Administrative Procedure 313 - Student Acceptable Use of Technology](#)
- PVNCCDSB [Administrative Procedure 903 - Police School Board Protocol](#)
- PVNCCDSB [Administrative Procedure 906 -Bullying Prevention and Intervention](#)
- PVNCCDSB [Administrative Procedure 908 - Progressive Discipline and Promoting Positive Student Behaviour](#)
- PVNCCDSB [Administrative Procedure 909 - Code of Conduct](#)
- PVNCCDSB [Administrative Procedure 910 - Suspension, Expulsion and Appeal](#)
- PVNCCDSB [Administrative Procedure 912 - Support Positive Student Behaviour for All](#)