



# Learning Environment

## Keeping Students Safe: Anti-Human Trafficking

Policy Number LE-13

The Simcoe Muskoka Catholic District School Board, in keeping with its Mission, Vision, and Values is committed to:

1. Providing a safe and secure learning environment for our students. The board is in a position of trust, and must protect the mental health and well-being of our students by fighting human trafficking and sexual exploitation.
2. Providing an environment in all of its facilities and programs that protect all students.
3. Empowering school communities to play a key role in providing a safe, nurturing and positive learning environment through the development and implementation of anti-human trafficking programs and strategies.
4. Collaborating with community police services, local child welfare agencies and other community organizations and service providers serving children, youth and their families to create community centered anti-human trafficking protocols.
5. Creating and maintaining Christ centered and engaging school environments which will lead to positive student experiences.

### **Procedural Guidelines Follow**

*Reviewed (New): Board Policy Review Committee Meeting #1 (Wednesday, January 26, 2022)*

*Reviewed: Board Meeting #4 (Wednesday, February 16, 2022)*



# Procedures and Guidelines Supporting Keeping Students Safe: Anti-Human Trafficking

Procedure Number LE-13

## 1. PURPOSE

The Ministry of Education Procedure/Program Memorandum 166 Keeping Students Safe: Procedure Framework for School Board Anti-Sex Trafficking Protocols (PPM166) sets a strong foundation for Ontario school boards to build local anti-human trafficking protocols.

This procedure will support coordinated action by all community partners to prevent, identify and recognize human trafficking and develop responses to facilitate early and appropriate intervention.

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 human 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. SCOPE

This Procedure applies to all students and employees of the Board. The Procedure also covers parents/guardians/caregivers, school council members, visitors, third party service providers, volunteers, permit holders, customers of the Board and other members of organizations while partaking in any activities that occur in Board premises or while engaging in Board or school related activities, either in-person or online.

Schools and school-related activities, such as extra-curricular activities, Board-sponsored sporting events and board-operated before and after-school programs and excursions comprising the learning and working environment, fall within the scope of this Procedure, as do Board 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.

## 3. DEFINITION OF HUMAN TRAFFICKING

Human trafficking refers to the control over and exploitation of an individual. In Ontario, human trafficking is most often for sexual exploitation, also known as “sex trafficking” (though cases of labour exploitation are also known to occur).

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, racialized, and marginalized individuals are especially vulnerable to experiencing sex trafficking. The intersections of colonization, intergenerational trauma, systemic discrimination and barriers to accessing service 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.

#### **4. KEY STAKEHOLDERS**

- 4.1 Parents/Guardians/Caregivers: Parents, guardians and caregivers are key partners in the development, implementation and review of school board anti-sex trafficking procedures and protocols. Care must be given when reaching out to parents, guardians and caregivers to ensure they are safe adults prior to engaging with them on matters regarding the student/s. Outreach to Indigenous parents, guardians and caregivers, as well as outreach to Black and racialized parents, guardians and caregivers, 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.
- 4.2 Students: Students are at the centre of this work and should be involved in efforts to develop awareness and actions against sex trafficking.
- 4.3 Community partners: Ongoing consultation and engagement with community groups/agencies that support members of the school community were essential to supporting our anti-sex trafficking approaches so that they are responsive to diverse students and the needs of our local communities.

#### **5. STRATEGIES TO INCREASE AWARENESS & PREVENT SEX-TRAFFICKING**

The 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.

##### **Staff**

- The Anti-Human Trafficking procedure and protocol will be available on the public facing school board website for reference.
- Teaching staff will have access to resources specifically developed for learning on Anti-Human trafficking in order to raise awareness among students on the following: 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 human trafficking to the school without fear of reprisal. Educators will also have access to 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.

### **Parents/Guardians/Caregivers**

- Parents, guardians and caregivers will have access to webinars and information available through the Board website that will include information on cyber-safety; the signs that a student is being targeted, lured, groomed, trafficked or is trafficking another student; how to get help safely, (through the school board and/or support hotline) and what parents can do. Resources from the Canadian Centre for Child Protection will also be linked to provide parents with tips on how to keep their children safer online and how to report suspicious activities.

### **Students**

- In order to increase student awareness schools will do a combination of the following: display posters, host information sessions, post on the school/school board social media accounts, and/or post information on the school board website (e.g., post phone number for the [Canadian Human Trafficking Hotline](#) to raise awareness about the supports and referrals it offers). Students voice will be consulted in order to determine the most effective pathway for increasing student awareness of human trafficking and how to report concerns.

## **6. STAFF TRAINING**

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

- key definitions, common misconceptions, and myths about human trafficking, including tactics used for online luring, grooming and recruitment;
- learning about human rights-based approaches to combatting human trafficking, including the application of an equity lens, anti-racism, a gender-based lens, trauma-informed approaches, and Indigenous cultural sensitivity;
- 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 human 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 human trafficking;
- roles and responsibilities of employees in raising awareness, identifying and responding to human trafficking.

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



## 7. TERMS AND DEFINITIONS

- 7.1 **2SLGBTQQIA:** Refers to two-spirit, lesbian, gay, bisexual, transgender, queer, questioning, intersex and asexual.
- 7.2 **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.
- 7.3 **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.”
- 7.4 **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.”
- 7.5 **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.”
- 7.6 **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.”
- 7.7 **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.
- 7.8 **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 trafficked. 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.
- 7.9 **Tactics** refers to methods traffickers may use 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.

- **Recruitment** – through personal contacts, social media, agencies and organizations, fraudulent advertisements, threats of violence, promise of a better life;
- **Transportation** – border crossings using fraudulent/genuine travel documents (international). Instances may involve little or no movement at all (domestic);
- **Exploitation** – forced labour, sexual exploitation, fraudulent marriages, illegal adoption/guardianship, child exploitation, organ removal; and
- **Isolation** – employed by traffickers to control survivors; can be accomplished through physical confinement, social isolation, or through confiscation of identification documents, limiting mobility and access to services.

7.10 **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<sup>1</sup>.”

## 8. RESPONSE PROCEDURES

Making disclosures or sharing personal information about an experience of exploitation by another person can be an emotional and vulnerable experience. Being a supportive, caring adult can have a positive effect on students. For more information and resources please refer to [Appendix A - SMCDSB Anti-Human Trafficking Response Protocol](#) and the section on *Self Care and Staff Support*.

The SMCDSB will provide staff with a detailed response protocol including who to contact, reporting requirements, when to consult, and the resources available.

The response protocols 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 for us to continue to build 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 Anti-Sex Rights Code; the Accessibility for Ontarians with Disabilities Act, 2005; the Education Act; and the Child, Youth and Family Services Act, 2017.

## 9. ROLES AND RESPONSIBILITIES

### 9.1 Superintendents

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<sup>1</sup> Government of Canada. (2018, February 2). [Trauma and Violence-informed Approaches to Policy and Practice](#).



Superintendents will provide consultation to administrators regarding the procedure and protocol and provide consultation as needed on responding and reporting. Superintendents will provide direction to school board senior staff regarding the anti-human trafficking procedure as well as oversee the monitoring and evaluation expectations.

#### 9.2 **Principals/Vice-Principals**

Principals/Vice Principals will familiarize themselves with the policy and procedure and support staff in navigating concerns related to human trafficking. Principals/Vice-Principals play the primary role in coordinating the response and reporting of human trafficking in their school as outlined in the protocol document.

#### 9.3 **Board Mental Health Staff**

Board mental health staff (school counsellors, psychologists/psychological associates) will provide support and consultation to school staff and administrators regarding the response protocol following a suspicion or disclosure of human trafficking as well as the process for referring students for support and how to support students returning to school following a trafficking situation. Consultation will also be provided regarding best practices and initiatives to increase student awareness of human trafficking and how to report concerns.

#### 9.4 **All Staff**

Staff will familiarize themselves with the policy, procedure, and follow protocol. These documents outline the steps that staff will take when there is a concern, suspicion, or disclosure related to human trafficking.

#### 9.5 **Students**

We are currently in the process of gathering feedback from students that will help to inform the students role and responsibilities.

### 10. **MEASURING SUCCESS: ACCOUNTABILITY & EVALUATION**

This procedure will initially be reviewed within the first year after the effective date, and subsequent reviews will be initiated regularly following the SMCDSB policy review cycle.

The Ministry of Education will collaborate with school boards, as well as anti-human trafficking partners, to develop a performance measurement framework and this will be used to monitor the effectiveness of the protocol and staff learning.



SIMCOE MUSKOKA CATHOLIC  
DISTRICT SCHOOL BOARD

## 11. REFERENCE DOCUMENTS

Policies & Protocols:

- [Appendix A - SMCDSD Anti-Human Trafficking Response Protocol](#)

Some of the following policies & protocols will require updates in the future to align with this new legislation.

- [AP-02 Child Protection Protocol for Reporting](#)
- [Police/School Board Protocol](#)
- [LE-05 Code of Conduct](#)
- [LE-16 Student Discipline](#)
- [LE-21 Equity and Inclusive Education](#)

Legislation:

- *Accessibility for Ontarians with Disabilities Act, 2005*
- *Child, Youth, and Family Services Act, 2017*
- *Education Act*
- *Human Rights Code*
- *Municipal Freedom of Information and Privacy Act*
- *Protecting Students Act*
- *The Ontario College of Teachers Act, 1996*

Other Documents:

- [PPM 9: Duty to Report Children in Need of Protection](#)
- [PPM 166: Keeping Students Safe: Procedure Framework for School Board Anti-Sex Trafficking Protocols](#)

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