



**Catholic District School Board of Eastern Ontario  
Conseil des Écoles Publiques de l'Est de l'Ontario  
Conseil Scolaire de District Catholique de l'Est Ontarien  
Upper Canada District School Board**

**Anti-Sex Trafficking School Board Protocol  
January 31, 2022**



## 1.0 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<sup>1</sup>. Welcoming and engaging school environments lead to positive student experiences, especially when families and communities are intentionally involved in the students' learning<sup>2</sup>. 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.

The purpose of the *Anti-Sex Trafficking Protocol* is to support coordinated action by all community partners to prevent, identify and recognize sex trafficking and develop responses to facilitate early and appropriate intervention. To that end, this protocol:

- Provides a summary of key principles supporting the implementation of this protocol
- Provides strategies to raise awareness of sex trafficking;
- Provides procedures for intervening with students at risk for sex trafficking or being trafficked, or with those who groom or recruit other students;
- Outlines the process for ongoing training for staff; and,
- Defines approaches for accountability and evaluation.

## 2.0 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 additionally 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.

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<sup>1</sup> In response to: [Legislative Assembly of Ontario, Private members' motions](#), 42nd Parliament, 1st Session, Motion 122 voted and carried on December 3, 2020.

<sup>2</sup> Ministry of Education. (2021). [Parent Engagement: Encouraging Parent Involvement in Schools](#).

### **3.0 STATEMENT OF PRINCIPLES**

#### **3.1 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 parents and guardians should be trauma informed. When approaching diverse communities, consideration of historic and systemic barriers 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.

#### **3.2 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.

#### **3.3 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. Refer to Appendix F of the Protocol for Community partners organised by county/region.

#### **3.4 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.

#### **3.5 Build up school-based prevention**

The development of the protocol will complement 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.

#### **3.6 Respect confidentiality, privacy and informed consent**

The development of procedures must 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.

### 3.7 Promote equitable and culturally safe responses

Protocols should 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.

## 4.0 STRATEGIES TO RAISE AWARENESS AND PREVENT SEX TRAFFICKING

### 4.1 School Board

The school board's protocol must include culturally safe strategies to raise awareness about sex trafficking with students, staff, parents, families and the broader school community. The protocol should apply to in-person and online learning, and include all school and school board activities, including field trips, overnight excursions, board-sponsored sporting events and board-operated before- and after-school programs. The Board undertakes to make the protocol and related procedures and resources publicly available and accessible on its website.

Ontario supports a series of [human trafficking prevention and awareness activities](#). Resources to help educate children and youth include:

- [“The Trap”](#), a digital human-trafficking education tool
- [“Speak Out: Stop Sex Trafficking”](#), an awareness campaign targeting the Indigenous community
- [Canadian Centre for Child Protection](#), resources for all stakeholders
- [Kidshelpphone.ca](#), resources for all youth

### 4.2 Awareness strategies for students

Awareness strategies for students must include:

- A process to raise awareness among students on the signs a student is being targeted, lured, trafficked or is trafficking another student, and how to bring their concerns regarding luring, grooming, recruitment or existing sex trafficking to the school without fear of reprisal.
- A process to enable students to bring their concerns forward anonymously.
- A 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, as well as through work with local community-based organizations and survivors.
- 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 using school board-provided technology.
- Include the telephone number of the [Canadian Human Trafficking Hotline](#), to raise awareness about the support and referral services it offers.
- Supports for youth post-trafficking.

### 4.3 Awareness strategies for parents and families

Develop awareness strategies for parents and families on the following topics:

- 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 or a support hotline);
- how they can report concerns to the school board (including anonymous reporting) and the school board's process for responding to concerns;

- the process should include approaches to overcome barriers to participation that Indigenous, Black, newcomer and other parents/guardians may face.
- Supports for families post-trafficking.

#### 4.4 Social Media

Engage the Board community on social media. Social media posts are designed specifically for schools' boards and educators to help share important resources and supports with families.

May include:

- Dangers of social media
- Keeping youth safe
- Phone scams-attempting to lure youth

## 5.0 VICTIM POPULATIONS AND SIGNS

### 5.1 Who is at an Increased Risk of Sex Trafficking

Traffickers identify a person's vulnerabilities and then target those vulnerabilities to gain trust and form a bond. Since everyone has vulnerabilities, anyone can be at risk of being trafficked. However, there are some specific risk factors that may make an individual more vulnerable:

- Students who are 2SLGBTQQA+ experience high rates of bullying, assaults and sexual abuse, and they may face isolation or displacement if they experience rejection from their family or the community
- Indigenous and racialized women and children – Indigenous peoples are especially vulnerable to sex trafficking due to historic and ongoing systemic discrimination. First Nation youth transitioning from remote Northern communities to schools in urban centres can also face increased safety risks.
- Students with disabilities may experience bullying and isolation in addition to having difficulty understanding the intentions of others
- Children and youth in care or transitioning out of care
- Language barriers, isolation, economic disadvantage or a lack of community and social supports may leave youth with increased vulnerability to trafficking
- Homeless and marginalized youth
- Individuals with low self-esteem, who are isolated or lack a sense of belonging.
- Individuals with unstable home/family environment.

### 5.2 Warning Signs that Someone may be a Victim of Human Trafficking Include:

- Being controlled by others, driven to and from locations, and escorted at all times
- Being controlled and watched by others, having someone speak for them in public
- Not having a passport or other forms of I.D. in their possession
- Not having control of their own money or cellphone, may have more than one cellphone in their possession
- Passport and ID documents confiscated by others
- Not being familiar with the neighborhood they live or work in
- Being moved frequently; claim to be "new" or "just visiting"
- Not being allowed to contact family or friends, isolation from family and friends
- Lying about age/false ID
- Providing scripted or rehearsed answers to casual questions

- May be in possession of excess cash outside their financial means, prepaid credit cards and/or have hotel keys
- A boyfriend/girlfriend who is significantly older than the student
- Sudden decline in academic performance
- Tattoos/branding (burning) suggesting 'ownership'
- Changing phones often
- Unknown boyfriend/girlfriend, that no one knows very much about

### **5.3 Mental Health or Signs of Abnormal Behaviour**

- Act in a fearful, anxious, submissive, or nervous manner, excessive concern about displeasing partner/employer
- Fearful of law enforcement or immigration services
- Avoids eye contact, has another person speak for them
- May have visible signs of substance dependency
- Expressing fear and intimidation through facial expressions or body language
- Suddenly spending more time away from home/late at night

### **5.4 Physical Appearance**

- May be dressed in age-inappropriate clothing
- May be dressed in clothing inappropriate for the time of year or context
- May suddenly have expensive clothing, purses, shoes, nail services
- Branding with tattoos of the trafficker's name or symbol
- May have bruises or other signs of physical abuse including malnourished
- Lacking in basic medical services or is being denied services by employer
- May show signs of being physically restrained, confinement or torture
- Change in appearance, hair, nails, etc.

### **5.5 Victims may:**

- Not know they are being victimized because they have a relationship with their trafficker – it could be their boyfriend or friend
- Not appear to need assistance because they have a place to live, food to eat, nice clothes, medical care and even a "paying job"
- Be unaware of their rights, or may have been intentionally misinformed about their rights so they don't know they can receive help
- Be taught to distrust and fear the government and law enforcement officers because they are afraid they will get arrested or deported (if from another country)
- Feel alone, isolated, helpless with nowhere else to turn. Subsequently they will do as they are told
- Fear for their safety or the safety of someone known to them, as some traffickers will threaten to harm the victim, their friends or family members if they report their situation to, or cooperate with law enforcement
- Feel as though they have a debt to "pay back" – for things like gifts, drugs, accommodation, recruitment fees etc.
- Suffer trauma and psychological effects. In human trafficking related to sexual exploitation, the victims may be exposed to higher incidences of HIV and sexually transmitted infections
- May become homeless, couch surfing

## 6.0 RESPONSE PROCEDURES

### 6.1 Setting the context

Intervention procedures must be trauma-sensitive and culturally responsive and, at minimum, include the following elements or direction to school board employees:

- A designated contact person/persons at the school board who is familiar with the school board's anti-sex trafficking protocol and who can support school board employees with response procedures.
- The 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.
- The process for responding in situations where a student could be involved in the trafficking of others, including steps for safely reporting concerns, responding to disclosures and supporting the student's immediate physical and emotional safety.
- The 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 in order to support re-integration into school.
- Guidance on 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 No. 9: Duty to Report Children in Need of Protection](#) and the *Child Protection School Handbook*, available through the school board.
- The process of notifying appropriate school or school board contacts and parents/guardians, as applicable.
- The process for school administrators to communicate and collaborate with community-based service providers, local police services, local Children's Aid Societies and Indigenous Child and Family Well-Being Agencies, as applicable and/or required by law, when responding to situations of suspected or confirmed sex trafficking of students.
- Direction on the approach for referring all affected students (including those indirectly affected, as needed) to supports.
- Direction on the approach for responding to possible sex trafficking recruitment by a student within the school, including appropriate interventions, supports and/or consequences, as applicable. Expectations should be consistent with the school board's 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 (IEP) must be considered.
- Direction on monitoring and following-up on incidents reported (for example, check-ins with affected students).
- Direction on documenting suspected or reported sex trafficking situations and response procedures that were implemented.
- Information on culturally responsive and trauma-sensitive personal supports available to school board employees responding to sex trafficking situations.
- All response procedures should be followed whether the trafficker is believed to be inside the school or in the community.

## **6.2 Response procedure when a student is at risk of or is being sex trafficked**

Response procedures must include addressing the needs of:

- 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 or who 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.

## **6.3 Response procedures in situations where a student targets, lures, grooms or recruits children and youth for the purpose of sex trafficking**

Response procedures must include addressing the needs of:

- 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 or who 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.

## **6.4 Response procedures in situations where students are returning to school after having been trafficked themselves or involved in trafficking others**

Response procedures must include addressing the needs of:

- 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 or who 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;
- Supports for students and families post-trafficking.

## **6.5 Privacy and confidentiality**

The Board collects, uses and discloses personal information in accordance with the Ontario *Municipal Freedom of Information and Protection of Privacy Act*, the *Child, Youth and Family Services Act, 2017* and any other applicable legislation.

## **7.0 TRAINING FOR SCHOOL BOARD EMPLOYEES**

The school board protocol outlines a process for providing ongoing training for school board employees, including teachers, administrators, and other school staff. Training will be approached through a trauma informed lens.

### **7.1 Board commitment**

The Board is committed to providing employees with ongoing training. The training will be tracked and be available throughout the year to all new and existing school board employees.

### **7.2 Training content**

Training must include the following elements:

- 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-sensitive approaches, and Indigenous cultural competencies;
- information on protection 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 is involved in, luring, grooming or trafficking others;
- intervention 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 while ensuring privacy and confidentiality;
- supports available to students and affected staff, including culturally responsive supports;
- additional training resources to support staff in understanding and safely responding to sex trafficking;
- roles and responsibilities of school board employees in raising awareness, identifying and responding to sex trafficking.

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

## **8.0 MEASURING SUCCESS: ACCOUNTABILITY AND EVALUATION**

The school board should review its protocol after the first year of implementation and going forward no less than every five years, or as part of their regular policy review cycle – whichever is the shorter period.

Following the first year, the school board may be required to report to the Ministry of Education, at the ministry's request, on its activities to achieve the expectations outlined in this policy framework.

The Ministry of Education will collaborate with school boards, as well as anti-human trafficking partners, to develop a performance measurement framework. This framework will monitor the effectiveness of training (for example, whether staff 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) and whether the protocols respond to the needs of students.

**Appendices (A to F attached):**

- Appendix A: Glossary of Terms
- Appendix B: AHST Admin Reporting and Response
- Appendix C: Administrator Scripts for Supporting HT Disclosures
- Appendix D: AHST Staff Reporting and Response
- Appendix E: Educator Scripts for Supporting HT Disclosures
- Appendix F: Anti-HT & Community Partners Resource List

## APPENDIX A: GLOSSARY OF TERMS

- **2SLGBTQIA:** 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<sup>3</sup>.”
- **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<sup>4</sup>.”
- **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<sup>5</sup>.”
- **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<sup>6</sup>.”
- **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.

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<sup>3</sup> Indigenous Primary Health Care Council. (2018, June). [Cultural Competency Guideline for Ontario Public Health Units to Engage Successfully with Aboriginal Communities](#).

<sup>4</sup> Williams, R. (1999). Cultural safety—what does it mean for our work practice?. *Australian and New Zealand journal of public health*, 23(2), 213-214.

<sup>5</sup> Douglas, M. D., Willock, R. J., Respress, E., Rollins, L., Tabor, D., Heiman, H. J., & Holden, K. B. (2019). Applying a health equity lens to evaluate and inform policy. *Ethnicity & disease*, 29 (Supplement 2), 329

<sup>6</sup> UNICEF. (2016, January 23). [A Human Rights-based Approach to Programming: What is HRBAP?](#)

- **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>7</sup>.” A trauma informed approach begins with understanding the physical, social, emotional impact of trauma on the individual.
- **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.

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<sup>7</sup> Government of Canada. (2018, February 2). [Trauma and Violence-informed Approaches to Policy and Practice](#).

## APPENDIX B: AHST ADMIN REPORTING AND RESPONSE

All response procedures outlined below must include considerations for addressing the needs of:

- 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 or who 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.

- A. If an **Administrator** has a **suspicion**\* that a student may be involved in human sex trafficking, they must contact their School Superintendent as soon as possible. *To maintain confidentiality, do not use student identifiers when consulting with staff.* Do not take further steps (e.g. approach the student or peers to investigate suspicions, contact police, etc.) unless advised to do so by the team. They will help provide considerations for next steps, including whether to talk to student/peers/staff and contact strategies for parents, police, community partners, etc.

\* - Suspicion may be based on what another student shares, or from observing potential signs of involvement.

- B. If an **Administrator** receives information from staff about a **Disclosure** from a student about their involvement in human sex trafficking:

<p><b>Recognize that making a disclosure is a highly vulnerable experience</b></p>	<p>Listen without judgement, validate their experience, hear them. Be aware of and soften your body language. Consider your bias: it may be hard to understand their experience. 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 connect the student with support). Avoid making promises you aren’t able to keep (e.g. confidentiality). <b>*Recognize that having a student repeat their story can cause harm/re-victimization</b></p>
<p><b>Keep the student safe</b></p>	<p>Ensure the student remains supervised by school staff. Ensure the student is not being re-victimized by having them repeat their story.</p>
<p><b>Contact staff for support</b></p>	<p>Contact your School Superintendent for consultation and resources. <i>To maintain confidentiality, do not use student identifiers when consulting with staff.</i> Contact Superintendent of Safe Schools for consultation and keep School Superintendent informed.</p>
<p><b>Ensure the Duty to Report to Children’s Aid Society (CAS) has been followed</b></p>	<p>The staff member that received the disclosure must follow the duty to report guidelines <b>CAS - Duty to Report</b> or students under 16 years of age, the staff member that received the report must contact local CAS. For students 16 and 17 years of age, the staff member that received the report <i>are encouraged to report to CAS. CAS strongly encourages reports of this nature.</i> Refer to school board protocols on reporting procedures and required forms. Contact School Superintendent for child protection questions.</p>
<p><b>Contact Police</b></p>	<p><b>Disclosure - Response Requirements</b> <b>Call local Police Services Non-Emergency Situation Line</b> to log the incident and have police dispatched. Request an officer skilled at working with vulnerable youth (Human</p>

	Trafficking Investigator if possible). Meet with police first to outline known information prior to police meeting with student.
<b>Contact Parent/Guardian, except...</b>	Call parent/guardian prior to the police meeting with the student, except if: Directed not to contact parent/guardian by CAS or police; Student is 18 years or older; Student is 16 or 17 years old and has withdrawn from parental control.

- C. If an [Administrator](#) receives information about an [Allegation](#) that student is involved in trafficking other students :

**Initiate Principal's Investigation**    **Consider the possibility that the alleged trafficker is also a victim of sex trafficking themselves**  
**Follow board process for disciplinary action related to suspension pending consideration of expulsion**

<b>Contact Police</b>	<b>Call local Police Services Non-Emergency Situation Line</b> to log the incident and have police dispatched. Request an officer skilled at working with vulnerable youth (Human Trafficking Investigator if possible).
<b>Contact staff for support</b>	<ul style="list-style-type: none"> <li>• Contact your School Superintendent for consultation and resources <ul style="list-style-type: none"> <li>○ <i>To maintain confidentiality, do not use student identifiers when consulting with staff.</i></li> </ul> </li> <li>• Contact Superintendent of Safe Schools for consultation and keep School Superintendent informed</li> </ul>

## APPENDIX C: ADMINSTRATOR SCRIPTS FOR SUPPORTING HT DISCLOSURES

### Administrator: Supporting Disclosures of Human Trafficking

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 reassuring effect on students:

- Listen, be non-judgemental – allow the student to express themselves
- Thank the student for trusting you
- Acknowledge the courage it takes to talk about the information/experience
- Mirror the language used by the student e.g. if they refer to the person harming as a boyfriend, use this term as well
- Avoid using justice system language e.g. perpetrator, victim
- Do not probe for additional information
- Do not promise confidentiality
- Encourage that help is available and that you will be there to help them engage with supports
- If you have a concern for their well-being, share this and let them know you want to connect them with professionals who can help

### Parent/Guardian Communication:

In instances of suspected or disclosed human trafficking to school staff, school staff **MUST** report this information to administrators **as soon as possible**. Administrators **MUST\*** contact parents/guardians to share the concern.

#### \*Exceptions to this include:

- If directed by police or CAS not to call the parents/guardians.
- If the student is 16 or 17 years old and has withdrawn from parental control.
- If the student is 18 years or older.
- Situations where students share information which leads you to believe that contacting parents/guardians will increase safety concerns for the student or negatively impact their well-being. Phone your School Superintendent AND the Superintendent of Safe Schools for an immediate consultation to make a determination.
- Phone your School Superintendent or Superintendent of Safe Schools.

### Consultation Support:

- Consultation support is available. When you have disclosures or suspicions of human trafficking, reach out for support from your *School Superintendent or Superintendent of Safe Schools regarding:*
  - General questions, determining a call to parents/guardians or CAS.
  - Questions pertaining to the process for reporting, calling police.
  - Calling CAS, reporting for 16 and 17 year olds.

## ADMINISTRATOR Scripts for Responding to and Supporting Students with Disclosures of Human Trafficking

**Key aspects of response: Remain calm, non-judgemental, empathetic, and validating**

Scenarios and Questions	Response:
General	<ul style="list-style-type: none"> <li>• <b>Do not leave the student alone.</b></li> <li>• <b>Ensure staff are not discussing the issue in hallways or public spaces, including staff workrooms or the lunchroom.</b></li> <li>• <b>Create an environment that is safe both emotionally and physically for the student (ie provide food, water, support staff, etc).</b></li> </ul>
Staff member reports a disclosed case of human trafficking to Administrator	<p>Staff Member X shared with me information today because they are worried for your safety and well-being.  <b>Refer to GENERAL SCRIPT below</b></p>
Administrator receives a disclosure of human trafficking from a student	<p>Thank you for sharing with me about what has been happening in your life. I am concerned about what you are telling me and I am worried for your safety and well-being.  <b>Refer to GENERAL SCRIPT below</b></p>
<p><b>GENERAL SCRIPT</b> - guidelines for response to disclosed human trafficking...</p>	<ul style="list-style-type: none"> <li>• My role as your school principal is to try to understand what might be happening for you and to get help. I am concerned about what you are telling me and I am worried for your safety and well-being.</li> <li>• When students share information that makes us concerned that they may not be safe, I need to reach out for help from resources in our community.</li> <li>• I will be here with you. We will figure this out together.</li> </ul> <p><b>Under 16 Years of Age:</b></p> <ul style="list-style-type: none"> <li>• I need to call the police and CAS about the information you shared.</li> <li>• The police and CAS work with students and schools to help students stay safe. Would you like to be present while I make these calls, or would you like to wait with staff member X?</li> </ul> <p><b>16 and 17 years of Age*:</b></p> <ul style="list-style-type: none"> <li>• I need to call the police about the information you shared.</li> <li>• I would also like to call CAS about the concerns you have shared. Both police and CAS work with students to help keep them safe and offer resources to you.</li> <li>• Would you like to be present while I make these calls or would you like to wait with staff member X?</li> </ul> <p><b>*For 16 and 17 year olds ONLY</b>  <b>Determine if the student wishes you to call CAS - document and report immediately to your School Superintendent if they do not want CAS called.</b></p> <ul style="list-style-type: none"> <li>• I would like to call our Behaviour Crisis Consultant to help in finding resources and offering immediate support to you. Would you be okay with this?</li> <li>• I need to call your parents to let them know what you have shared with me today. Would you like to be in the room when I call or would you prefer to wait with staff member X?</li> </ul>

	<p><b><i>At any point if the student expresses reluctance around involving the above supports, see guidelines below.</i></b></p>
<p>The student expresses fear for their safety if police or CAS are contacted</p>	<ul style="list-style-type: none"> <li>• I'm hearing that you are feeling scared about what will happen if we call the police and/or CAS.</li> <li>• I need to call my School Superintendent for more support and information about what the next steps are.</li> <li>• I am going to ask you to wait with staff member X while I make a phone call.</li> </ul> <p><b><i>*Contact your School Superintendent or the Superintendent of Safe Schools for an immediate consultation.</i></b></p>
<p>The student identifies to you they do not want police involved</p>	<ul style="list-style-type: none"> <li>• I understand that you have concerns about a call being made to the police. We work with the police to get students help.</li> <li>• I have to make a call to the police when I am concerned that a student is unsafe. Right now, I am concerned that you are not safe.</li> <li>• Would you like to be with me while I make the call or would you prefer to wait with staff member X?</li> </ul> <p><b><i>*Consultation available with your school Superintendent or the Superintendent of Safe Schools.</i></b></p>
<p>The student identifies to you they do not want CAS involved</p>	<p><b>For students under 16:</b></p> <ul style="list-style-type: none"> <li>• I understand that you do not want a call to be made to CAS. CAS is a resource to youth when they may be unsafe. The laws in Ontario instruct me to call when I have a concern for a student's safety.</li> </ul> <p><b>For students 16 and 17 years of age:</b></p> <ul style="list-style-type: none"> <li>• I understand that you do not want a call to be made to a CAS. I am concerned for your safety and want to connect you with this agency to offer you some more resources right now.</li> <li>• CAS has recently changed to provide more services to 16 and 17 year olds who may have concerns for their safety.</li> </ul> <p><b><i>*Immediately call your School Superintendent to determine whether a call will be made to CAS. The decision must be documented.</i></b></p> <p><b><i>*Some students may worry about the impact of CAS becoming involved on their parents or a younger sibling.</i></b></p>
<p>The student identifies they do not want School Behaviour Crisis Consultant involved</p>	<ul style="list-style-type: none"> <li>• I hear you saying you do not want to speak with our School Behaviour Crisis Consultant. I would like to consult with the School BCC to help me to connect to resources to assist you.</li> <li>• They will be aware of other outside services that may feel more comfortable for you. They are very experienced in dealing with situations like what you are experiencing and may be able to help.</li> </ul> <p><b><i>*Administrators can always access a Behaviour Crisis Consultant for consultation about human trafficking cases.</i></b></p> <p><b><i>*Students do not have to meet with the School BCC for support.</i></b></p>

<p>The student identifies to you they do not want their parents/guardians to know</p>	<ul style="list-style-type: none"> <li>• I'm hearing that you really do not want me to call your parents/guardians about what has been happening.</li> <li>• Can you help me better understand what your concerns are with your parents knowing? How do you think they might respond?</li> </ul> <p><b><i>*If you are concerned that the student's safety will be negatively affected by a call to parents, you must call your School Superintendent for further consultation.</i></b></p> <p><b><i>*If the student is 16 or 17 AND has withdrawn from parental control, no call is to be placed to parents.</i></b></p>
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### **Self Care and Staff Support:**

Supporting students who may be involved with human trafficking, can be emotionally upsetting and/or stressful work. Your School Superintendent, as well as board staff e.g. Superintendent of Safe Schools, Behaviour Crisis Consultant can be resources to you and the School Team as you plan for the student's safety and well-being.

When a Human Trafficking Case is reported to the Superintendent, they will contact Behaviour Crisis Consultant who will follow up to ensure support is available for the school staff.

If you are concerned for someone you care about or are looking for support for yourself please touch base with your Employee Assistance Program. **Help is available and can be accessed confidentially.**

## APPENDIX D: ANTI-HUMAN SEX TRAFFICKING – STAFF RESPONSE AND REPORTING PROTOCOL

If a **Staff member** has a **suspicion\*** that a student may potentially be involved in human sex trafficking, they must contact their administration right away. *Do not take further steps* (e.g. approach the student or peers to investigate suspicions, contact police, etc.) unless advised to do so by your administrator. Administration may also ask the educator to consult with CAS.

\*Suspicion may be based on what another student shares, or from observing potential signs of involvement.

If **Staff** receive a **Disclosure** from a student about their involvement in human sex trafficking:

<p><b>Recognize that making a disclosure is a highly vulnerable experience</b></p>	<ul style="list-style-type: none"> <li>● <b>Listen without judgement, validate their experience, hear them.</b></li> <li>● <b>Be aware of and soften your body language.</b></li> <li>● <b>Consider your bias: it may be hard to understand their experience.</b></li> <li>● <b>Mirror their language e.g. if they say “boyfriend,” use this term.</b></li> <li>● <b>Let them take the lead in sharing, avoid leading the conversation* (do not probe for their story, instead connect the student with support).</b></li> <li>● <b>Avoid making promises you aren’t able to keep (e.g. confidentiality).</b></li> </ul> <p><b>*Recognize that having a student repeat their story can cause harm/re-victimization</b></p>
<p>Keep the student safe</p>	<ul style="list-style-type: none"> <li>● Ensure a confidential and comfortable space for the student and do not leave the student alone.</li> <li>● Be aware of potential threats to their safety, including fellow classmates being involved in trafficking, a trafficker who is known to be on or around school property, or even that family may be involved in the trafficking</li> </ul>
<p>Explain your role</p>	<ul style="list-style-type: none"> <li>● 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.</li> </ul> <p><b>Always make the student aware that you are obliged to disclose any information regarding safety issues with your administrator and possibly the police and CAS.</b></p>
<p>Contact School Admin</p>	<p><b>Immediately contact your school administrator</b> regardless of the age of the student.</p> <p><b>In addition</b> to a requirement to report to a school administrator, your role <b>may</b> include:</p> <ul style="list-style-type: none"> <li>● the duty to report concerns to Children’s Aid Society (CAS);</li> <li>● in conjunction with administration, engaging appropriate school board partners, to create a plan with the student and for help in navigating Human Trafficking resources and support.</li> <li>● being present in subsequent conversations between the student, administration, school board staff, and community partners engaged in the response if the student wants you as a key support, and it is determined to be appropriate;</li> </ul>
<p>Report to CAS</p>	<p><b>CAS - Duty to Report:</b> Please refer to school board protocols on reporting procedures and required forms.</p> <ul style="list-style-type: none"> <li>● For students under 16 years of age, staff <b>MUST</b> report to the administrator and CAS (<b>see local contact number</b>);</li> <li>● For students 16 and 17 years of age, staff <b>MUST</b> report to the administrator and <i>are encouraged</i> to report to CAS. <b>CAS strongly encourages reports of this nature.</b></li> </ul>

## APPENDIX E: EDUCATOR SCRIPTS FOR SUPPORTING HT DISCLOSURES

## Educators: Supporting Disclosures of Human Trafficking

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 reassuring effect on students:

- Listen, be non-judgemental – allow the student to express themselves
- Thank the student for trusting you
- Acknowledge the courage it takes to talk about the information/experience
- Mirror the language used by the student e.g. if they refer to the person harming as a boyfriend, use this term as well
- Avoid using justice system language e.g. perpetrator, victim
- Do not probe for additional information
- Do not promise confidentiality
- Encourage that help is available and that you will be there to help them engage with supports
- If you have a concern for their well-being, share this and let them know you want to connect them with professionals who can help

## Educator Scripts for Responding to Disclosures of Human Trafficking

**Key aspects of response: Remain calm, non-judgmental, empathetic, and validating**

Scenarios and Questions	Response:
General	<ul style="list-style-type: none"> <li>• <b>Do not leave the student alone.</b></li> <li>• <b>Ensure staff are not discussing the issue in hallways or public spaces, including staff workrooms or the lunchroom.</b></li> <li>• <b>Create an environment that is safe both emotionally and physically for the student (i.e. provide food, water, support staff, etc.)</b></li> </ul>
<b>GENERAL SCRIPT</b> - guidelines for response to disclosed human trafficking....	<p><i>Thank you for sharing with me. I am concerned about what you are telling me, and I am worried for your safety and well-being. When students share information that makes us concerned that they may not be safe, we need to connect with the Principal to support you and figure out what needs to happen next.</i></p> <p><b>*Consult with Administrator before proceeding to next steps (reminder: STUDENT CANNOT BE LEFT ALONE)</b></p>
<b>CAS Reporting</b>	<p><b>Under 16 Years of Age:</b> <i>I need to call CAS about the information you shared. CAS works with students and schools to help students stay safe. Would you like to be present while I make this call, or would you like to wait with X staff member?</i></p> <p><b>16 and 17 years of Age:</b> <i>I would like to call CAS about the information you shared. CAS works with students to help keep them safe and offer resources to you.</i></p> <p><b>For 16/17 year olds, determine the student's wishes about you calling the CAS - document and consult with your Administrator.</b></p>

<p>The student identifies to you they do not want their parents to know</p>	<p>I'm hearing that you really do not want your parents to know about what has been happening. Can you help me better understand what your concerns are with your parents knowing? How do you think they might respond?</p> <p><b><i>*If you are concerned that the student's safety will be negatively affected by a call to parents, notify your Administrator, who will call your School Superintendent for further consultation.</i></b></p> <p><b><i>*If the student is 16 or 17 and has withdrawn from parental control, no call is placed to parents by the Administrator.</i></b></p>
<p><i>The student becomes upset, agitated, denies or attempts to retract the earlier disclosure</i></p> <p>OR</p> <p><i>The student expresses fear for their safety if police, CAS are contacted</i></p>	<p>We hear this is upsetting you may/do not want me/the Principal to share this information with police and/or CAS. Is there something we can do to make this feel safer for you? We want to work with you to share your concerns with police/CAS. Is there something more we can do or offer to be supportive right now?</p> <p><b><i>*Administrator will determine next steps in coordination with the School Superintendent.</i></b></p> <p><b><i>Do not promise the student that a call will not be made.</i></b></p>
<p>The student identifies to you they do not want CAS involved</p>	<p><b>For students under 16:</b></p> <p>I hear that you do not want a call to be made to CAS. CAS can be a resource to youth when they may be unsafe. I have an obligation to contact them when I have a concern for a student's safety. Would you like to be present while I make this call, or would you like to wait with X staff member?</p> <p><b>For students 16 and 17 years of age:</b></p> <p>I understand that you do not want a call to be made to CAS. I am concerned for your safety and want to connect you with this agency to offer you some more resources right now. CAS has recently changed to provide more services to 16 and 17 year olds who may have concerns for their safety. Can we explore this further together?</p> <p><b><i>*Immediately call your Administrator. Administrators can contact their School Superintendent to determine whether a call will be made to CAS. The decision must be documented.</i></b></p>
<p>The student identifies they do not want School Behaviour Crisis Consultant involved</p>	<ul style="list-style-type: none"> <li>• I hear you saying you do not want our School Behaviour Crisis Consultant involved. They are aware of community resources available that may be able to help you. I can consult with them without giving them your information, they have more experience and may have some ideas that I have not considered. Would that be okay with you?</li> <li>• If the student says no, provide them with a list of crisis supports.</li> </ul> <p><b><i>*Administrators can always access a School Behaviour Crisis Consultant for consultation about human trafficking cases.</i></b></p> <p><b><i>*Students do not have to meet with the School BCC for support.</i></b></p>

The student does not want community resources involved	<ul style="list-style-type: none"> <li>• I hear that you do not want any resources involved right now.</li> <li>• If you change your mind, we (the school) can connect you at any time. The door is always open.</li> <li>• If you do not want to talk to me about it, you can also access information through our School Behaviour Crisis Consultant.</li> <li>• We care about you and want to ensure that you have support.</li> </ul> <p><b><i>*Ensure that your principal is made aware of the conversation with the student.</i></b></p>
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### **Self Care and Staff Support:**

Supporting students who may be involved with human trafficking, can be emotionally upsetting and/or stressful work. Your Principal, the School Superintendent, as well as board staff e.g. Superintendent of Safe Schools, Behaviour Crisis Consultant, etc., can be resources to you and the School Team as you plan for the student's safety and well-being.

When a Human Trafficking Case is reported to the Superintendent, they will contact Behaviour Crisis Consultant who will follow up to ensure support is available for the school staff.

If you are concerned for someone you care about or are looking for support for yourself please touch base with your Employee Assistance Program. **Help is available and can be accessed confidentially.**

## APPENDIX F: COMMUNITY PARTNERS - SUPPORTING VICTIMS AND SURVIVORS OF HUMAN TRAFFICKING

### By County Partners

County	Police	Family and Children Services	Victim Services	Interval House	Sexual Assault & Domestic Support
Akwesasne	Akwesasne Police: (613)575-2340	Akwesasne Child & Family Services: (613)575-2341, x. 3139	Akwesasne Mohawk Police Victim Services: (613)360-8897  Victim Services of Stormont, Dundas, Glengarry and Akwesasne: (613)938-8900, 1-866-264-8900		
Lanark	OPP: 1-888-310-1122 • Carleton Place • Lanark Smiths Falls Police: (613)283-0357	Family and Children Services LLG 613-498-2100 • Carleton Place • Perth • Smiths Falls	Victim Services of Lanark County: (613)284-8380; 1-866-575-0067	Lanark Interval House 1-800-267-7946	Lanark County Sexual Assault Support and Domestic Violence Program: (613)283-2330
Leeds & Grenville	OPP: 1-888-310-1122 • Grenville County • Leeds County • Rideau Lakes • Thousand Islands Brockville Police: (613)342-0127	Family and Children Services LLG 613-498-2100 • Brockville	Victim Services of Leeds & Grenville: 1-800-939-7682  North Grenville: (613)803-7597	Leeds Grenville Interval House: (613)498-4724	
Prescott-Russell	OPP: 1-888-310-1122 • Hawkesbury • Rockland • Russell County	Valoris of Prescott Russell • Plantagenet: (613)673-5148 or 1-800-675-6168 • Offices as well in Embrun, Hawkesbury and Rockland	Victim Services of Prescott-Russell: (613)632-5282, 1-877-632-7530	Interlude House: (613)632-1131	

Stormont, Dundas & Glengarry	OPP: 1-888-310-1122 <ul style="list-style-type: none"> <li>• Alexandria</li> <li>• Lancaster</li> <li>• Morrisburg</li> <li>• Stormont, Dundas &amp; Glengarry</li> <li>• Winchester</li> </ul> Cornwall Police: (613)932-2110	Children's Aid of SD&G <ul style="list-style-type: none"> <li>• Cornwall:              (613)933-2292</li> </ul>	Victim Services of Stormont, Dundas, Glengarry and Akwesasne: (613)938-8900, 1-866-264-8900	Naomi's Family Resource Centre: (613)774- 2838	Sexual Assault Support Services of S.D.G. & A. Crisis Line: (613)932- 1755
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#### National/Regional Partners

- Canadian Human Trafficking Hotline: 1-833-900-1010