

Preliminary Provisions: Anti-Sex Trafficking Policy

1. RATIONALE

The Anti-Sex Trafficking Policy (P098) (the “Policy”) supports implementation of the Ministry of Education’s Policy/Program Memorandum (PPM) 166: Keeping Students Safe: Policy Framework for School Board Anti-Sex Trafficking Protocols.

The Policy supports protecting students from sexual exploitation and sex trafficking while empowering school communities to play a key role in providing a safe, nurturing, positive learning and working environment, through the development and implementation of anti-sex trafficking programs and strategies.

The Policy is aligned with the TDSB’s Human Right Policy (P031), Equity Policy (P037), Dealing with Abuse and Neglect of Students Policy (P045), Caring and Safe Schools Policy (P051), and the Gender-based Violence Policy (P071).

The Policy is also aligned with governing legislation, including but not limited to, the *Human Rights Code*, the *Education Act*, the *Child, Youth, and Family Services Act, 2017*, the *Accessibility for Ontarians with Disabilities Act, 2005*, the *Municipal Freedom of Information and Protection of Privacy Act*, and the *Protecting Students Act*.

2. OBJECTIVE

To set out principles for supporting coordinated action by the Board and school community to identify, recognize and prevent sex trafficking and develop responses to facilitate early and appropriate intervention.

3. DEFINITIONS

2SLGBTQQIA refers to two-spirit, lesbian, gay, bisexual, transgender, queer, questioning, intersex and asexual.

Anti-racism refers to the practice of identifying, challenging, and changing the values, structures and behaviors that perpetuate Systemic Racism. (Ontario Anti-Racism Secretariat). Anti-racism examines the Power Imbalances between racialized people and non-racialized/white people. These imbalances play out in the form of unearned Privileges that white people benefit from and racialized people do not (McIntosh, 1988).

Board refers to the Toronto District School Board, which is also referred to as the “TDSB”.

Cultural responsiveness refers to and 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 refers to and 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 refers to 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

Sex trafficking refers to 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.

Survivor refers 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. TDSB employees should confirm how an individual impacted by trafficking prefers to be referenced.

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.

TDSB is the Toronto District School Board, which is also referred to as the "Board".

Trauma-informed approaches refers to 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 refers 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. TDSB employees should confirm how an individual impacted by trafficking prefers to be referenced.

4. RESPONSIBILITY

The Director of Education holds primary responsibility for the implementation of this Policy.

Within the Director's Office, the responsibility for the coordination and day-to-day management of the Policy is assigned to the Associate Director, Equity, Well-Being and School Improvement.

5. APPLICATION AND SCOPE

This Policy applies to all students, employees, and Trustees of the Board.

The Policy also covers, parents/guardians, 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 Policy, 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 Policy.

6. POLICY

6.1. Statement of principles

- 6.1.1. In developing and implementing provisions related to anti-sex trafficking, the TDSB will:

- (a) define a role for parents/guardians/caregivers through:
 - ensuring parents, guardians and caregivers are key partners;
 - ensuring care is 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;
 - ensuring outreach to Indigenous parents and guardians, as well as outreach to Black and racialized parents and guardians, is trauma-informed and recognizes historic, systemic, linguistic, and/or cultural barriers that may impact participation.
 - (b) foster student voices by:
 - supporting and empowering student groups to participate and inform the design, development, delivery and implementation of anti-sex trafficking provisions.
 - (c) build multi-sectoral relationships with community organizations by:
 - consulting and engaging with culturally relevant and responsive community groups/agencies in developing and implementing anti-sex trafficking provisions in order to be responsive to the diverse needs of local school communities.
 - (d) ensure interventions are safe by:
 - increasing protective factors and helping reduce risk factors associated with sex trafficking, through providing comprehensive anti-sex trafficking training to staff, which will include:
 - supporting early intervention through identification and appropriate response; including connecting impacted persons to supportive services;
 - Identifying signs of human and sex trafficking;
 - safely responding to disclosures;
 - being culturally relevant and responsive to diverse student populations;
 - and supporting the immediate physical and emotional safety needs of students.
 - (e) build up school-based prevention through:
 - understanding the social and historical context of sex trafficking and implementing prevention strategies that are responsive to the needs of the students and members of the local school community;
 - employing strategies that complement existing prevention efforts at TDSB schools, including the
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teaching of consent, healthy relationships and healthy sexuality.

- (f) respect confidentiality, privacy, and informed consent through:
 - recognizing the Boards obligations under provincial and federal laws, to deal with each student individually, with respect, dignity, equity and with due regard to confidentiality, privacy, and informed consent as per legal requirements, including those under the *Human Rights Code*, *Municipal Freedom of Information and Protection of Privacy Act*; *the Accessibility for Ontarians with Disabilities Act, 2005*; *the Education Act*; and *the Child, Youth and Family Services Act, 2017*.
- (g) promote equitable and culturally safe responses through:
 - implementing a human rights-based, non-judgemental, culturally responsive, survivor-centered and trauma-informed approach when raising awareness, preventing, identifying and responding to sex trafficking.

6.2. Employing a Multi-Sector Approach

- 6.2.1. TDSB anti-sex trafficking protocol will be developed in collaboration and partnerships with persons with lived experience of trafficking as well as Indigenous organizations, local Children's Aid Societies, victim services, police services and other community-based service providers in order to facilitate information-sharing and a coordinated response.
- 6.2.2. The TDSB will involve representatives from Indigenous, Black, racialized and newcomer groups and Francophone organizations, as well as American Sign Language and Québec Sign Language organizations, to develop a culturally safe and equitable approach related to anti-sex trafficking protocol.
- 6.2.3. Building on existing partnerships, the TDSB will align and leverage local community safety and well-being planning efforts to protect the school community from trafficking. This will include consulting with local anti-human trafficking committees, local situation tables and processes with victim services, sexual assault centres, youth shelters, public health units and other community-based organizations on effective anti-sex trafficking programs and strategies.
- 6.2.4. The TDSB will 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, in responding to situations of suspected or confirmed sex trafficking of students.

- The local Children's Aid Society must be notified when a child, 17 years and under, is at 'risk of' and in need of protection with concerns of Sex and/or Human Trafficking.

6.3. Strategies to Raise Awareness and Prevent Sex Trafficking

6.3.1. The TDSB will employ culturally safe strategies to raise awareness about sex trafficking with students, school board employees, parents, caregivers, and the broader school community. These strategies will include:

- (a) making the Anti-Sex Trafficking Policy and related procedures and resources publicly available and accessible on the TDSB websites;
- (b) outlining of processes to raise awareness among parents and caregivers about:
 - cyber-safety
 - the signs that a student is being targeted, lured, groomed, trafficked or is trafficking another student; how to get help safely (for example, through the school board, community providers and/or support hotline);
- (c) how individuals can report concerns to the TDSB (including anonymous reporting) and the TDSB's process for responding to concerns:
 - the process will include approaches to overcome barriers to participation that Indigenous, Black, newcomer and other parents/guardians may face;
- (d) processes in place to 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. The processes developed will allow for concerns to be brought forward anonymously;
- (e) processes 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;

- (f) 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;
- (g) awareness strategies that may involve sending letters or emails, providing information in a student handbook, displaying posters, hosting information sessions, posting on the school/school board social media accounts, and/or posting information on the school board website (e.g., posting phone number for the Canadian Human Trafficking Hotline to raise awareness about the supports and referrals it offers).

6.4. Response Procedures

- 6.4.1. The Board will develop and implement related anti-sex trafficking procedures for TDSB employees when responding to situations where a student:
 - (a) may be at risk of or is being sex trafficked
 - (b) may be targeting, luring, grooming or recruiting children and youth for the purpose of sex trafficking
 - (c) is returning to school after they have been trafficked or involved in trafficking others
- 6.4.2. The related anti-sex trafficking procedures must be trauma-informed and culturally responsive and address the needs of:
 - (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

6.5. Support and Training for Employees

- 6.5.1. Professional Support Services staff at the TDSB will be designated to support employees with anti-sex trafficking programs and strategies. This will include support with:

- (a) 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;
- (b) the process for responding to situations where a student may be engaged in the trafficking of others, including steps for safely reporting concerns, responding to disclosures, and supporting students' immediate physical and emotional safety;
- (c) 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 to support re-integration into school;
- (d) 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 9: Duty to Report Children in Need of Protection*;
- (e) clear information on legislated privacy and confidentiality requirements when responding to a suspected or confirmed instance of sex trafficking;
- (f) the process of notifying appropriate school/school board contacts and parents/guardians, as applicable;
- (g) direction on the approach to referring all affected students (including those indirectly affected, as needed) to supports;
- (h) direction on the approach to responding to possible sex trafficking recruitment by a student within the school, including appropriate interventions, supports and/or consequences, as applicable:
 - expectations are to be consistent with the TDSB's Caring and Safe Schools Policy (P051) and the mitigating circumstances that must be considered when determining the intervention, consequences or supports. For students with special education needs, information in the student's Individual Education Plan must be considered;
- (i) direction on the approach to appropriately respond to and meet the needs of students who are victims and survivors of sex trafficking, including access to education and facilitating school re-entry for those returning to school;
- (j) direction on monitoring and following-up on incidents reported (for example, check-ins with affected students);

- (k) direction on documenting suspected or reported sex trafficking situations and response procedures that were implemented;
 - (l) information on culturally responsive and trauma-informed personal supports available to school board employees responding to sex trafficking situations.
- 6.5.2. The Board will provide ongoing training for TDSB employees, including teachers, administrators, and other school staff on anti-sex trafficking strategies. The training will consist of:
- (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 employees in raising awareness, identifying and responding to sex trafficking.
- 6.5.3. The training will be tracked and be available throughout the year to all new and existing TDSB employees. The TDSB will update the training program on ongoing basis and deliver regularly to stay current with emerging issues relating to trafficking and changes in community services and response.

6.6. Accountability and Evaluation

- 6.6.1. In collaboration, with the Ministry of Education, anti-human trafficking partners and local agencies, such as the Children's Aid Society and Indigenous Child and Family Well-Being Agencies, and

other school boards, the TDSB will develop a performance measurement framework.

- 6.6.2. This framework will monitor the effectiveness of training (e.g., 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 provisions in place respond to the needs of students (e.g., helped children and youth in care stay out of, or exit, human trafficking). This will be measured with performance indicators on how the provisions in place are preventing trafficking within school communities.