



Human Trafficking

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Memo To: All Staff

From: Director of Education

ACCESSIBILITY:

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PURPOSE:

Human trafficking is a hidden crime and involves the recruitment, transportation, harbouring and/or exercising control, direction or influence over the movements of a person in order to exploit that person, typically through sexual exploitation or forced labour (commonly referred to as sex or labour trafficking). There is no universal experience of human trafficking, and it is known to result in severe trauma for survivors, who may have non-linear healing journeys as they work to rebuild their lives.

With the rise of sex trafficking in Ontario, all educational stakeholders, including youth, parents, educators, administration and support staff can play significant roles in both response and prevention. Announced in 2021, the Ministry of Education mandated all school boards in Ontario to develop anti-sex trafficking protocols as part of PPM 166 to respond appropriately and implement prevention initiatives. There is an urgency to this work, with cases increasing as a result of COVID-19 and intensified online engagement from youth. Decolonizing our approaches to preventing human trafficking are paramount, as Indigenous and Metis women and girls are disproportionately represented in human trafficking victims, making up nearly 50%, despite being only 4% of the overall Canadian female population.

School boards however cannot act alone. Cross-sector collaboration with community, child and youth services, Indigenous, gender-based violence and women's organizations, and police are crucial in addressing this issue holistically. This protocol articulates the role of educational stakeholders in responding effectively with youth who make disclosures, and to take proactive roles in encouraging students to come forward. Schools are uniquely positioned to redress some of the risk factors of sexual exploitation- including fostering a sense of belonging, building social supports, offering basic needs, and fostering psychological safety in coming forward. The protocol identifies key preventive actions to support youth if they are being targeted, while actively encouraging students to disclose to an adult they trust. This Administrative Procedure (AP) focuses on the school climate and the school environment, and therefore is limited to a certain degree in its implementation.

REFERENCES:

- [Policy/Program Memorandum 166](#)



FORMS:

- APH036-01F: [Human Trafficking – Student, Checklist](#) - PRIVATE

REPORTS:

- N/A.

APPENDICES:

- Appendix A: [Tips for Supporting Youth Making Disclosure](#)
- Appendix B: [Glossary of Terms](#)
- Appendix C: [Response Procedures](#)

COMMENTS AND GUIDELINES:

Engaging Parents, Guardians and Caregivers

The Waterloo Catholic District School Board (WCDSB) will work with our schools to identify entry points to build the awareness of sex trafficking with parents, guardians and caregivers. It's crucial to recognize that parents and guardians have varying levels of comfort and familiarity with the topic and should be engaged appropriately. Catholic School Advisory Councils, and the Catholic Parent Involvement Committee (CPIC) will be used to raise this issue, while providing space for questions and concerns. Ensuring parents are aware of preventative online safety tips and tools will be crucial in building their capacity to support their children in having equitable and consensual relationships through digital platforms.

Ensuring parents have the confidence and tools they need to discuss healthy relationships and respectful communication with their sons is crucially important if we are to challenge misogyny and other forms of oppression which young girls face on a daily basis. Boys and male youth also face discrimination from their peers if they behave in ways contrary to societal gender stereotypes. This work must also be contextualized in understanding multi-generational trauma and impacts of colonialism on Indigenous women and girls, and 2-spirited individuals as well as the impacts of racism and unconscious bias in relation to our black and Indigenous students.

Fostering Student Engagement

Student groups, particularly social justice, LGBTQ2S+, Indigenous student groups will be provided opportunities to offer feedback on an ongoing basis on the protocol implementation and identifying any gaps and areas for improvement. Feedback will be sought to further enhance the Administrative Procedure (AP) to ensure youth can also support one another if they believe a peer is being exploited or trafficked. While some students may not feel like they have a safe adult to speak to in the school community, they likely will share with a friend, who can in turn offer support and encourage disclosure. Anti-bullying, gender and inclusivity initiatives developed and led by students can help to redress the risk factors previously identified which place vulnerable students at risk. Engaging with students with lived experience of sexual exploitation and trafficking to share their stories can be an important tool for awareness and prevention. However, this type of programming must be conducted using strong survivor-centered approaches. If possible, providing additional trauma and culturally informed interventions and support with Indigenous children, and children in care (attending schools in the Waterloo Region) can help to reduce the risk factors of victimization, and help to prevent trafficking.

This Administrative Procedure inherently builds from values as stated in the Waterloo Catholic District School Board Strategic Plan- strategic priorities #1 and #4 focused on Catholic Faith and Culture, and Mental Health and Well-Being.

- Share responsibility amongst all stakeholders for creating and fostering a welcoming, culturally responsive, and safe environment that encourages and promotes equity and inclusivity
- Provide opportunities for students to get to “know who they are” and feel confident in their own experience, values, vision and strengths
- Engage in proactive, preventative and ongoing support for student mental health and personal well-being;
- Consciously work to provide a sense of psychological safety for all students;

- Foster an environment that embraces and respects the mental health and wellness support for students and staff.

By fostering psychological safety and trust between educators, administrative staff and students, schools in turn address the risk factors of youth sex trafficking - feelings of isolation, lack of belonging and social supports.

Building Multi-Sectoral Relationships with Community Organizations

Waterloo Catholic District School Board will leverage its relationships with local and regional community organizations, including child welfare agencies, women's and Indigenous-led organizations. With increasing disclosures from students, community agencies will face an increased demand for services and support. Building relationships with gender-based violence and anti-human trafficking local organizations will be crucial to support schools in implementing the protocol using trauma-informed and culturally sensitive approaches.

ROLE OF WOMEN'S, ANTI-HUMAN TRAFFICKING AND WATERLOO REGION VIOLENCE PREVENTION GROUPS

- Provide ongoing technical expertise (intersectional feminist perspectives) in protocol implementation opportunities and challenges
- Feedback on culturally sensitive and survivor centered approaches
- To provide direct support with students who have been victimized

These organizations can be accessed for referrals and support services:.

[Sexual Assault & Domestic Violence - St. Mary's General Hospital \(smgh.ca\)](http://smgh.ca)

[Sexual Assault Support Centre Waterloo Region - We Support Survivors of Sexual Violence. \(sascwr.org\)](http://sascwr.org)

[Women's Crisis Services of Waterloo Region \(wcsvr.org\)](http://wcsvr.org)

[Canadian Human Trafficking Hotline](http://1888.ca)

ROLE OF INDIGENOUS GROUPS AND ELDERS

- Ongoing collaboration to ensure Indigenous students are supported
- Provide direct support with students who have been victimized
- Provide feedback on protocol implementation from a diversity of Indigenous perspectives
- Partner with schools to offer programming which builds a culture of inclusivity, and belonging, supporting the school to decolonize approaches

[Anishnabeg Outreach – Centre for Indigenous Healing \(aocan.org\)](http://aocan.org)

[KIND MINDS FAMILY WELLNESS: Culture + Research + Community Engagement](http://www.kindmindsfamilywellness.ca)

ROLE OF CHILD, YOUTH AND FAMILY SERVICES

- Collaborate to provide additional supports with vulnerable students
- as appropriate with any investigation with police
- Educate foster parents and families about risks and signs of sex trafficking

Organization named in the consultation: Family and Children Services Waterloo Region

[Family & Children Services of the Waterloo Region \(facswaterloo.org\)](http://facswaterloo.org)

ROLE OF POLICE

- In the case of a formal disclosures, the police will be engaged to investigate

- Ongoing trust and relationship-building with students to help to encourage disclosures (explore “plain clothes officers” while on school grounds)
- Re-iterate to students who have been victimized will not face repercussions, and are not in the wrong
- To liaise as appropriate with the school and parents/guardians to respond to the disclosure
- Information sharing with school boards
- Waterloo Region Police work alongside First Nations Community Policing when responding to a disclosure involving an Indigenous student

[Human Trafficking - Waterloo Regional Police Service \(wrps.on.ca\)](http://wrps.on.ca)

[Human Trafficking - Victim Services of Waterloo Region \(vswr.ca\)](http://vswr.ca)

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 (Ontario Government).

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 a “do no harm” approach (Ontario Government).

Given the important role of police in the investigation of sex trafficking, engaging key police officers (Indigenous and non-Indigenous) as key liaisons in the school, which are committed to fostering trust with students may help to encourage disclosures. Police in plain clothes for example, and informal opportunities to connect and meet with students to encourage disclosures, can redress fear and distrust between students and police.

School-Based Prevention

Incorporating sex trafficking and exploitation content within existing healthy relationship, sexuality and consent curriculum should be explored. Contextualizing these issues in root causes, including; colonialism and patriarchy are important for students to deepen their understanding. Additional gender transformative programming which directly engages male-identified youth to unpack male gender stereotypes and harmful gender norms which informs much of the mentality of sex trafficking perpetrators and groomers can help to lessen the risk of young men trafficking others. Girls empowerment programming may also be explored to redress the risk factors of sexual exploitation and trafficking so as to foster confidence and self-esteem.

Student groups should be engaged to develop a peer-to-peer digital safety and healthy relationships program (developed and facilitated by youth). A social media campaign which highlights warning signs and shares prevention messages will be developed across schools in the Waterloo region, enhancing collaboration and solidarity on this issue.

The following recommendations¹ will support youth engagement in response and prevention of sex trafficking;

- Provoke critical thought when discussing child sexual exploitation and sex trafficking;
- Unpacking child sexual exploitation and sex trafficking by exploring supporting concepts;
- Distinguish between an abusive and healthy relationships;
- Critically examine masculine culture and promote non-violence;
- Encouraging action;
- Discuss online safety;
- Youth-led conversations, activities and initiatives

¹White Ribbon Canada (2014). Youth Engagement in Preventing Sexual Exploitation and Human Trafficking: An exploration of promising practices. White Ribbon Canada, Toronto. April 2014

Respect Confidentiality, Privacy and Informed Consent

The development of procedures must respect confidentiality and ensure students fully understand 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;

- Youth and Family Services Act (2017)
- Municipal Freedom of Information and Protection of Privacy Act
- Ontario Human Rights Code
- Accessibility for Ontarians with Disabilities Act, 2005
- The Education Act
- Child Prevention of and Remedies for Human Trafficking Act, 2017, S.O. 2017, c. 12, Sched. 2
- Combating Human Trafficking Act (2021)
- Safe Schools Act (2020)
- Personal Health Information Protection Act (2004)

Promote Equitable and Culturally Safe Responses

Protocols should demonstrate a human rights-based, non-judgmental, culturally responsive, survivor-centered and trauma-informed approach to raising awareness, preventing, identifying and responding to sex trafficking (Ontario government). By engaging with First Nations policing and local Indigenous and cultural organizations this can ensure responses are de-colonized.

Awareness Raising Strategies

A holistic approach, which engages youth, parents, educators, senior administration, and support staff will help to build awareness on the root causes and forms of sex trafficking as well as culturally and trauma-informed³ response procedures. The following strategies are recommended:

- Utilize existing internal and external communications (ie. e-newsletters) to share response and prevention of sex trafficking related content, including; root causes, red flags of sexual exploitation and sex trafficking, and support services (Ongoing)
- Include physical posters at the school with local sex trafficking support services contact information Waterloo Information #'s
- Communicate the Board and school's commitment to robust response and prevention of sex trafficking on social media channels (Ongoing)
- Annual training with all staff, educators, senior administration and support staff regarding sex trafficking response and prevention
- Engage local sex trafficking organizations, including survivors to share their lived experiences and their resilience in moving forward (Ongoing)
- Share the anti-sex trafficking protocol and training materials on the WCDSB website, and offer a contact to reach out for additional information (Annual updates)
- Host virtual/or in-person training with parents, guardians and caregivers⁴ regarding digital safety, healthy and consensual relationships, and sex trafficking response and prevention areas (ongoing)
- Together with community partners, engage student groups (ie. youth alliance, peer leadership groups) to explore feasibility in developing a peer-to-peer digital safety and healthy relationships program (building on peer-to-peer networks and support) which can help to prevent recruitment in sex trafficking

Response and Prevention of Sex Trafficking Among Vulnerable Students

- Explore the development of a youth-led social media campaign engaging all schools in the region, and integration of anti-sex trafficking related content with Grades 7-9. Areas should include; signs a student is being targeted, lured, groomed, trafficked or is trafficking another student; and how to bring concerns about luring, grooming, recruitment or exiting sex trafficking to the school without fear of reprisal. The process should allow for concerns to be brought forward anonymously.
- Integration of (age appropriate) digital safety and consensual relationships content within relevant Grades 4-9 curriculum to advance prevention efforts.

- Engage local community organizations to share knowledge and information, in particular any new referral programs and services to support youth victims
- Gender transformative training approaches which challenge gendered and colonial expressions of power and control, while encouraging boys and young men to adopt healthy ideas of masculinity, and adopt equity and consent in their relationships off and online.

Sex trafficking awareness-raising activities will be assessed based on participant evaluation feedback, and enhanced to deepen learning goals and outcomes.

Training with School Board Employees

WCDSB will build on lessons learned from the anti-human trafficking internal training provided to all educators and staff in September 2021. The training will be updated to reflect emerging issues relating to trafficking and changes in local and regional community services and response. The training will be provided on an annual basis, with opportunities for shared learning on the use of the protocol, and benefits of playing supportive and active roles in supporting student well-being and safety. There are opportunities to strengthen content regarding the colonial and gendered nature of trafficking, which will deepen educators and staff understanding of the broader social and economic inequities which exacerbate exploitation and trafficking. Local survivor groups, and students with lived experiences of exploitation can shed crucial insights within training programs.

Training e-modules are available on the WCDSB website and can be accessed at any time. Training will include the elements below, per Ministry guidance.

- key definitions, common misconceptions and myths about sex trafficking, including tactics used for online luring, grooming and recruitment;
- learning about human rights-based approaches to combatting sex trafficking, including the application of an equity lens, anti-racism, a gender-based lens, trauma-informed approaches and Indigenous cultural competencies;
- information on protective factors and prevention-focused supports and resources
- information on risk factors and signs that a student is at risk, being lured, groomed or trafficked;
- signs that a student is or involved in luring, grooming or trafficking others;
- response procedures, including the duty to report, how to handle disclosures to support students' safety, how to support students impacted by sex trafficking and how to share information to ensure privacy and confidentiality;
- supports available to students and affected staff, including culturally responsive supports;
- additional training resources to support staff to understand and safely respond to sex trafficking;
- roles and responsibilities of school board employees in raising awareness, identifying and responding to sex trafficking

Accountability and Evaluation

During the first year of implementation, WCDSB will consult with the Ministry of Education to review the school board's anti-sex trafficking protocol and offer advice and suggestions, as requested by individual boards. The PPM 166 recommends a five-year review period, or as part of the regular policy review cycle (whichever is the shorter period of time). However, given this is a new protocol, and an urgent human rights issue, the protocol will be reviewed on an annual basis assessing its efficacy with youth, parents, educators and staff.

A Superintendent of Education who oversees the Mental Health portfolio will develop a brief summary report to the Board of Trustees on the use of the AP, and will share it on the board's website on a yearly basis.

The following areas will be monitored by the Superintendent of Education who oversees the Mental Health portfolio and will be used to assess the efficacy of the protocol.

- Awareness levels amongst students, parents, educators and staff regarding the main pillars of the protocol;
- Capacity levels of WCDSB staff to respond using trauma and culturally informed approaches;
- # of disclosures by children/youth (collect data dis-aggregated by race, class, sexualities, abilities, age, language capacity where possible);

- Number of incidents involving human trafficking is documented and collected by the school social workers. This data is provided monthly to the lead social worker and SO responsible for the portfolio. Metrics are provided bi-annually to executive council and reported as an aggregate in the MYSP.
- Qualitative feedback/personal stories (confidential) from students who have disclosed regarding their experience;
- # of educators self-reporting they have used the protocol;
- # vulnerable students (per school) provided additional social and emotional supports to redress risk factors;
- Extent to which students feel comfortable disclosing to school staff, educators;
- Extent to which students are aware of online safety tips and capacity to identify red flags of grooming.

The oversight of the protocol implementation will fall under the primary responsibility of the Superintendent of Education who oversees the Mental Health portfolio. The number of incidents involving human trafficking is documented and collected by the school social workers. This data is provided monthly to the lead social worker and supervisory officer responsible for the portfolio. Metrics are provided bi-annually to executive council and reported as an aggregate in the Multi-Year Strategic Plan.