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Procedure Title	Anti-Sex Trafficking		
Date of Issue	January 19, 2022	Related Policy	BP 6820-D
Revision Dates		Related Forms	AF 6850
Review Date		Originator	Administrative Council

Education Act; Municipal Freedom of Information and Protection of Privacy Act; Policy/Program Memorandum (PPM) 166 "Keeping Students Safe: Policy Framework for School Board Anti-Sex Trafficking Protocols; BP 1408-D "Privacy and Information Management"; Information and Privacy

Commissioner of Ontario's Privacy and Access to Information in Ontario Schools: A Guide for Educators; AP 6850-D "Child Maltreatment (Suspected) – Reporting"; AP 6825 "Progressive Discipline – Students"

1.0 RATIONALE

- 1.1 Welcoming and engaging school environments lead to positive student experiences, especially when families and communities are intentionally involved in the students' learning. Safe schools both physically and psychologically are a critical element to successfully nurturing positive student experiences.
- 1.2 Schools are ideally placed to respond to sex trafficking and are a key factor in helping survivors of trafficking heal and rebuild their lives. They promote safety by building a culture of caring and by taking meaningful, culturally responsive, and consistent action to prevent and respond to issues of safety and inappropriate behaviours.
- 1.3 Integrating the core components of the Ministry of Education's Policy/Program Memorandum (PPM) 166
 "Keeping Students Safe: Policy Framework for School Board Anti-Sex Trafficking Protocols", Bluewater
 District School Board believes that the comprehensive approach outlined within this procedure, coupled
 with a collaborative approach for implementation are critical for the protection of its students and
 empowering its school communities to play a key role in the fight against sex trafficking and keeping
 children and youth safe from sexual exploitation.
- 1.4 This procedure, and all related initiatives/protocols will 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.

2.0 DEFINITIONS

- 2.1 Sex trafficking: Sex-trafficking is a form of sexual exploitation and is a crime under the Criminal Code of Canada. It can include recruiting, harbouring, transporting, obtaining, or providing a person for the purpose of sex. It involves the use of force, physical or psychological coercion or deception. Most individuals who are trafficked for the purpose of sexual exploitation are women and girls, but all people may be targeted.
- 2.2 **2SLGBTQQIA:** Refers to two-spirit, lesbian, gay, bisexual, transgender, queer, questioning, intersex and asexual.
- 2.3 **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

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to identify, remove, prevent, and mitigate racially inequitable outcomes and power imbalances between groups and change the structures that sustain inequities.

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- 2.4 **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."
- 2.5 **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."
- 2.6 **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."
- 2.7 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."
- 2.8 **Survivor:** Used to refer to an individual who has escaped a trafficking situation, whereas victim is used to refer to an individual who is in the process of being recruited or is being trafficked. The term survivor may also be used to refer to an adult with lived experience of being 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.
- 2.9 **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.
- 2.10 **Trauma-informed approaches:** Are "policies and practices that recognize the connections between violence, trauma, negative health outcomes and behaviours. These approaches increase safety, control and resilience for people who are seeking services in relation to experiences of violence and/or have a history of experiencing violence."
- 2.11 **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.

3.0 PROCEDURE

3.1 STATEMENT OF PRINCIPLES

3.1.1 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 will be taken 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.

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Outreach to Indigenous parents and guardians, as well as outreach to Black and racialized parents and guardians, will be trauma-informed and will recognize historic and systemic barriers that may impact their participation.

Every effort will also be made to reduce cultural and/or linguistic barriers when reaching out to parents, guardians, and caregivers about this work.

3.1.2 Foster student voices

Students are at the centre of this work and will be involved in efforts to develop actions against sex trafficking. Bluewater District School Board recognizes that students with lived experience are experts and, if willing and appropriately supported through trauma-informed approaches, could share their story and insights as part of efforts to build awareness and empower students.

3.1.3 Build multi-sectoral relationships with community organizations

Bluewater District School Board will endeavor to ensure that ongoing consultation and engagement with community groups/agencies that support members of the school community takes place, as it is recognized as an essential component in the support of anti-sex trafficking approaches that are responsive to diverse students and the needs of local school communities.

3.1.4 Interventions must be safe

It is recognized that 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. As appropriate, Bluewater District School Board employees will be provided with comprehensive anti-sex trafficking training so they are equipped to identify the signs of sex trafficking, safely respond to disclosures, be culturally relevant and responsive to diverse student populations, and support the immediate physical and emotional safety needs of students.

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

3.1.5 Build-up school-based prevention

All additional prevention/intervention measures that are implemented will complement existing prevention efforts in schools, including the teaching of consent, healthy relationships, and healthy sexuality. It is important that school staff 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.

3.1.6 Respect confidentiality, privacy, and informed consent

Confidentiality and privacy are always a priority in Bluewater District School Board. Informed consent will always be sought to ensure that the student fully understands how their information may be used or with whom it may be shared.

Bluewater District School Board will strive 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.

3.1.7 Promote equitable and culturally safe responses

All initiatives/protocols that are developed as part of the implementation of this procedure will demonstrate a human rights-based, non-judgmental, culturally responsive, survivor-centred, and trauma-informed approach to raising awareness, preventing, identifying, and responding to sex trafficking.

3.2 STRATEGIES TO RAISE AWARENESS AND PREVENT SEX TRAFFICKING

3.2.1 All Bluewater District School Board anti-sex trafficking initiatives/strategies/protocols developed from this procedure will include 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, but are not limited to:

3.2.1.1 posting this procedure, as well as related resources, publicly on the Bluewater District School Board website

- 3.2.1.2 a process/processes to raise awareness among parents and caregivers about:
 - i. cyber-safety
 - ii. 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)
 - iii. how they can report concerns to the school board (including anonymous reporting) and the school board's process for responding to concerns

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- 3.2.1.3 approaches to overcome barriers to participation that Indigenous, Black, newcomer, and other parents/guardians may face
- 3.2.1.4 initiatives to raise awareness among students on the signs that a student is being targeted, lured, groomed, trafficked or is trafficking another student, and how to bring concerns (anonymous or not) about luring, grooming, recruitment or exiting sex trafficking to the school without fear of reprisal.
- 3.2.1.5 initiatives aimed to prevent the 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 communitybased organizations and survivors.
- Consideration will be given to the use of available technology and tools to identify and deter potential 3.2.2 situations involving students who could be at risk of sex trafficking and other online threats, while using school board-provided technology.
- 3.2.3 Awareness strategies such as 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 will be considered, as appropriate.
- 3.2.4 Schools are encouraged to post/provide the phone number for the Canadian Human Trafficking Hotline to raise awareness about the supports and referrals it offers.

3.3 **RESPONSE PROCEDURES**

- 3.3.1 Bluewater District School Board has established guidelines and best practices for school board employees to respond in situations where a student:
 - may be at risk of or is being sex trafficked;
 - may be targeting, luring, grooming, or recruiting children and youth for the purpose of ii. sex trafficking:
 - is returning to school after they have been trafficked or involved in trafficking others; and iii.
 - iv. may be indirectly impacted by a trafficking situation.
- 3.3.2 These guidelines/best practices are provided in Appendix A: Response Procedures, Appendix B: Educator Response Supports, and Appendix C: Administrator Response Supports.
- 3.3.3 Students are encouraged to report any concerns of, or involvement in sex trafficking, to any staff member that they trust. Anonymous reports may be sent to the area superintendent of education.

3.4 TRAINING FOR SCHOOL BOARD EMPLOYEES

- 3.4.1 Bluewater District School Board will provide training for school board employees, including teachers, administrators, and other school staff, as appropriate. This training will include the following elements:
 - key definitions, common misconceptions, and myths about sex trafficking, including tactics used for online luring, grooming and recruitment

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- ii. 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
- iii. information on protective factors and prevention-focused supports and resources
- iv. information on risk factors and signs that a student is at risk, being lured, groomed, or trafficked
- v. signs that a student is or involved in luring, grooming or trafficking others
- vi. 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
- vii. supports available to students and affected staff, including culturally responsive supports
- viii. additional training resources to support staff to understand and safely respond to sex trafficking
- ix. roles and responsibilities of school board employees in raising awareness, identifying, and responding to sex trafficking
- 3.4.2 The training will be tracked and will be available throughout the year to all new and existing school board employees.
- 3.4.3 Training will be updated and delivered regularly to stay current with emerging issues relating to trafficking and changes in community services and response.

3.5 MEASURING SUCCESS: ACCOUNTABILITY AND EVALUATION

Administrative Council will review this procedure in accordance with the board's established five-year cyclical review process.

Bluewater District School Board will follow a performance measurement framework, as developed by the Ministry of Education. 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.

Bluewater District School Board acknowledges that it may be required to report the activities implemented to achieve the expectations outlined in this procedure. Community anti-human trafficking partners and local agencies, such as child protective services like Children's Aid Societies and Indigenous Child and Family Well-Being Agencies, may be invited to participate in the reporting process to the Ministry of Education, in collaboration with the board, to determine how the protocols have helped children and youth in care stay out of, or exit, human trafficking.

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APPENDIX A: RESPONSE PROCEDURES

Remember, making a disclosure, or sharing personal information about exploitation by another person, can be a difficult, emotional, and vulnerable experience.

Administrators are encouraged to reach out to the board's Mental Health Team to help inform their, and their staff's, responses/approach to traumatic events, such as sex-trafficking.

It will be important to:

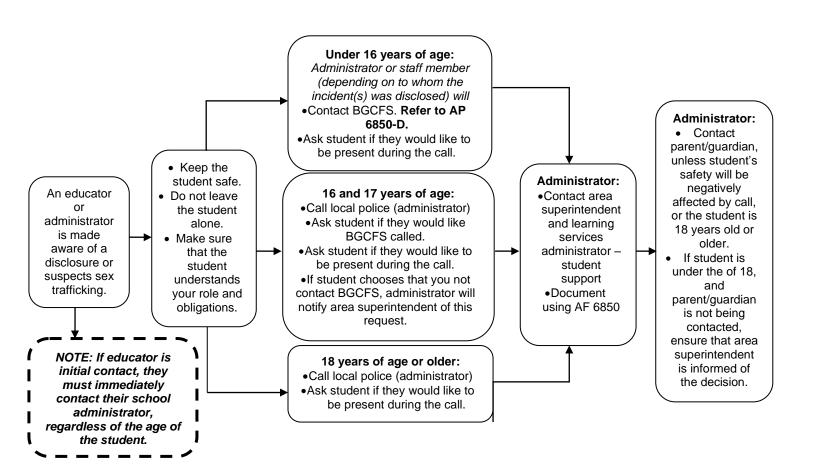
- actively listen to the student without judgement;
- consider your bias: avoid projecting your own feelings; strive to understand the choices a student has made, the barriers they experience, and empathize with their current situation;
- be respectful and responsive to the student's age/culture/background;
- not probe for additional information;
- be mindful that the re-telling of their story/situation may be traumatic and the person on receiving the
 disclosure should make all efforts to reduce re-traumatization taking a trauma-informed and culturally
 responsive approach to receiving disclosure;
- be aware of and soften your body language (due to possible trauma);
- mirror the language they use to describe their situation/experiences. For example, if they say "boyfriend," use this term;
- avoid using justice system language (e.g., perpetrator);
- let them take the lead in sharing, avoid leading the conversation (do not probe for their story, instead listen respectfully, provide support);
- avoid making promises you are not able to keep (e.g., assurance of confidentiality);
- assure the student that their safety is a priority;
- thank the student for trusting you and for coming forward;
- validate the courage it takes to for them to talk about their experience and share information;
- encourage the student that help is available, and that accepting help can provide additional support for their journey ahead;
- not promise confidentiality and help them understand the limitations to confidentiality regarding their experience with being trafficked/exploited;
- share your concerns for their well-being and let them know you want to connect them with persons/ professionals who can help;
- make the student aware of available community-based resources for support that can be accessed confidentially, as well as the Canadian human trafficking hotline (1- 833-900-1010);
- encourage the student not to blame themselves and explain that what happened is not their fault;
- take into consideration the individual needs of students:
 - who are in care, receiving care, or are in customary care arrangements;
 - with special education needs, mental health needs, social/emotional needs, language/cultural barriers, and/or international students.
- try to understand the complexity of each individual situation. Students may become involved in sex-trafficking recruitment and/or a student who has been a victim of sex-trafficking may also become the trafficker.
 Responses to these types of situations may or may not need to consider progressive discipline in accordance with AP 6825-D "Progressive Discipline Students". Mitigating circumstances must always be considered when determining intervention, consequences, and/or supports.

Self-Care and Staff Support

Supporting students who may be involved with sex trafficking, can be emotionally upsetting and/or stressful work. Principals, area superintendents, board staff responsible for safe schools, as well as board staff responsible for mental health etc., can be resources to you as you plan for the student's safety and well-being.

Support may also be available through your Human Resources Services Department and/or Employee and Family Assistance Program. If you are concerned for someone you care about, or are looking for support for yourself, personal support is available for employees from Bluewater District School Board's Employee Family Assistance Plan provider.

Flow Chart for Educator / School Administrator Response



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Scenario A: Educator Receives a Disclosure, or Suspects Sex Trafficking

RESPONSIBILITY	ACTION ITEMS
Keep the student safe	 I. Always make the student aware that you are obligated to disclose any information regarding abuse/illegal activity with your administrator, possibly the police, and Bruce Grey Child and Family Services (BGCFS). II. You must be aware that a threat to their safety may be imminent and an immediate response and intervention may be required.
Frankia nala	III. Do not leave the student alone.
Explain your role	I. Explain that your priority is the student's safety and that your role in supporting the student is to connect them with persons/professionals who can help respond to the concern that they have shared with you. These roles include:
	a. reporting to the school administration;
	b. the duty to report child protection concerns;
	c. contacting learning services administrator-student support for support;
	 d. aiding in identifying and connecting the student to supportive services, such as a school mental health worker, psychologist or trauma specialist, specialized anti-human trafficking service provider;
	e. if the student identifies you as a key support, and the administrator determines this is appropriate, offering to be present in subsequent conversations between the student, administration, school mental health worker, and community partners engaged in the response;
	f. in conjunction with administration, engaging appropriate school board staff/partners, including appropriate community partners and frontline service providers, to create a safety plan with the student and refer them to appropriate resources.
Bruce Grey Child and Family Services (BGCFS) – Duty to	Bruce Grey Child and Family Services (BGCFS) - Duty to Report requires the following:
Report	 a. For students under 16 years of age, staff MUST report to the administrator and BGCFS;
	 b. For students 16 and 17 years of age, staff MUST report to the administrator and may report to BGCFS. See board policy/procedure AP 6850-D.
Contact School Administration	Immediately contact your school administrator, regardless of the age of the student.

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Scenario B: Administrator Receives a Disclosure, or Suspects Sex Trafficking

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RESPONSIBILITY	ACTION ITEMS
Keep the student safe	Always make the student aware that you may be obliged to disclose any information regarding abuse/ illegal activity with the police and BGCFS.
	II. Ensure the student remains supervised by school staff.
	III. Ensure the student is not being re-victimized by having them repeat their story.
Bruce Grey Child	I. If you have received the disclosure, or suspect sex trafficking, call BGCFS.
and Family Services - Duty to Report AP 6850-D	II. If a staff member received the disclosure or suspects human trafficking, verify that staff have called BGCFS.
	a) Students under 16 years:
	Verify that the staff member who received the disclosure has called BGCFS and has provided you with documentation to support this, or call BGCFS if disclosure is made to you.
	b) Student 16 and 17 years:
	Verify whether the staff member, who received the disclosure, has contacted BGCFS and provided you with the documentation. Record the decision to call BGCFS and contact your area superintendent for further consultation if the decision is made not to call.
	III. Contact learning services administrator-student support for child protection questions at 519-363-2014.
Who to call	I. Refer to procedure on anti-sex trafficking.
	II. Call the area superintendent of education.
	III. Contact learning services administrator-student support for consultation and resources.
	IV. To engage in consultation with board staff responsible for safe schools, contact the learning service administrator-student support.
Contacting Parents/Guardians/	I. Refer to administrative procedure AP 6824-D "Anti-sex trafficking".
Caregivers	II. Call parent/guardian/caregiver prior to the police meeting with the student, except if:
	 a) you have been directed not to contact parent/guardian/caregiver by BGCFS or local police;
	b) the student is 18 years of age or older; or,
	c) the student is 16 or 17 years of age and has withdrawn from parental control.
Contact Police	I. Suspected Case - Consultation Options Local police services contact – there may be specific support/investigators who address human trafficking available.
	II. Disclosure - Response Requirements Follow AP 6801-D "Police/School Protocol".

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RESPONSIBILITY	ACTION ITEMS	
Human Trafficking Hotline (Optional)	I. If you, or someone you know, may be a victim, you may call the National Human Trafficking Hotline at: 1-833-900-1010.	
	II. The hotline connects victims and survivors of human trafficking to specialized anti-human trafficking services and supports, emergency shelters, transition housing, long-term supports, counselors, and a range of other trauma-informed services, and where applicable, law enforcement.	
	III. The hotline is also an entry-point for individuals interested in learning more about specialized human trafficking restraining orders. Services are offered in 200+ languages and are accessible to the deaf, hard-of-hearing, and non-verbal.	
Specialized Anti- Human Trafficking Services and Supports in Ontario	I. A list of dedicated services and supports across Ontario that help victims, survivors, and persons at risk of human trafficking can be accessed at: https://www.ontario.ca/page/human-trafficking-services-and-supports	
	II. This includes community and Indigenous-led organizations who provide specialized services and supports to victims of human trafficking across the province.	

NOTE:

Students are encouraged to report any concerns of or involvement in sex trafficking to any staff member that they trust. Anonymous reports may be sent to the area superintendent of education.

Supporting student re-entry into school after they have been involved in a trafficking situation

- i. If not already done, develop a safety/re-entry plan for each student in collaboration with relevant staff, the student(s), family members and community partners, as applicable, to support re-integration into school. The safety/re-entry plan should include, at a minimum; ongoing interventions, trauma-informed and culturally responsive resources, supports and/or accommodations and provisions to protect student privacy and safety.
- ii. Maintain confidentiality in accordance with relevant legislation and AP 1408-D "Privacy and Information Management".
- iii. Regularly monitor and check-in with the student(s) as outlined in the safety/re-entry plan(s).

Supporting students who may be indirectly impacted

While maintaining confidentiality, ensure students who may be indirectly impacted are aware of supports and services to support their personal mental health and wellbeing. This may include engaging 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.

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APPENDIX B: EDUCATOR RESPONSE SUPPORTS - SUPPORTING DISCLOSURES OR SUSPICIONS OF SEX TRAFFICKING

TASK	SUPPORTS	
Duty to Report Child Sex Trafficking to Bruce Grey Child and Family Services	 Section 125 of the Child, Youth and Family Services Act, 2017 (CYFSA) states that the public, including professionals who work with children, must promptly report any suspicions that a child is, or may be, in need of protection to a children's aid society. Bluewater District School Board reports to Bruce Grey Child and Family Services (BGCFS). 	
	II. Amendments with respect to child sex trafficking have been made to the CYFSA that impact the duty to report. These amendments add a duty to report suspicions that a child is in need of protection because they are at risk of, or are victims of, child sex trafficking.	
	II. A professional, or member of the public, who is concerned that a 16 or 17-year-old is, or may need, protection due to child sex trafficking may, but is not required to, make a report to BGCFS. The youth's consent is not required for a professional to make a report. Children's aid societies are required to assess all reports that a child needs protection.	
	V. Section 125 of the CYFSA states that the public, including professionals who work with children, must promptly report any suspicions that a child is, or may be, in need of protection to a children's aid society. Bluewater reports to BGCFS.	
	V. Amendments, with respect to child sex trafficking, have been made to the CYFSA that impact the duty to report. These amendments add a duty to report suspicions that a child is in need of protection because they are at risk of, or are victims of, child sex trafficking.	
	/I. A professional, or member of the public, who is concerned that a 16- or 17- year-old is, or may be, in need of protection due to child sex trafficking may, but is not required to, make a report to a children's aid society. The youth's consent is not required for a professional to make a report.	
	II. These amendments come into effect on October 1, 2021. Please see Policy/Program Memorandum (PPM) 9 'Duty to Report Children in Need of Protection' for more information, and administrative procedure AP 6850-D.	
Contacting Parents/Guardians/ Caregivers	In instances of suspected or disclosed sex trafficking to school staff, school staff report this information to administrators as per administrative procedure AP 6824-D. Notification procedures may vary or may not be applicable depending on age of the student (e.g., students 18 years or older, or students who are 16 or 17 years old and have withdrawn from parental control).	
Consultation Support	. When educators have cases of suspected or disclosed human trafficking identified or disclosed, reach out for support from your administrator.	

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TASK	SUPPORTS	
	II. If you believe that a child under 16 years of age is in need of protection due to child sex trafficking, you have a duty to report your concerns directly to BGCFS.	
	 Administrators can determine the appropriate staff for consultation, for example: area superintendent of education: General questions, determining a call to parents/guardians/caregivers, or a children's aid society. learning services administrator-student support: Process for reporting, calling local police. learning services administrator-student support: Accessing school social work or community resources. 	
	Bruce Grey Child and Family Services: Reporting concerns that a child is or may be in need of protection due to child sex trafficking.	

SAMPLE EDUCATOR SCRIPTS

Students

Sample educator scripts for responding to, and supporting students with, suspicions or disclosures of sex-trafficking.

Please always keep the following in mind:

- Do not leave the student alone.
- Ensure staff are not discussing the issue in hallways or public spaces, including staff workrooms or the lunchroom.
- Remember your obligations related to privacy and access to information, in accordance with board policy BP 1408-D "Privacy and Information Management" (and related procedures), as well as the <u>Information and Privacy Commissioner of Ontario's Privacy and Access to Information in Ontario Schools: A Guide for Educators</u>

SCENARIOS AND QUESTIONS	SAMPLE RESPONSE
A student shares information that leads you to suspect, or	"Thank you for trusting me and sharing with me about what has been experiencing and/or happening in your life."
makes a disclosure that they are involved in human trafficking	"I am concerned about what you are telling me, and I am worried for your safety and well-being."

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SCENARIOS AND QUESTIONS	SAMPLE RESPONSE
General - response to suspected or disclosed human	"My role as your teacher is to try to understand what might be happening or what you are experiencing, and to get help."
trafficking	"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 or that someone may be hurting them. I need to reach out for help from resources in the community. I need to contact the principal for help in finding resources and offering immediate support to you. The principal will be able to help us figure out what needs to happen next."
	(NOTE: STUDENT CANNOT BE LEFT ALONE)
	*Consult with principal before proceeding to next steps.
	Youth Under 16 Years of Age
	"I need to call Bruce Grey Child and Family Services about the information you shared."
	"Bruce Grey Child and Family Services works with students and schools to help student stay safe."
	"Would you like to be present while I make these calls, or would you like to wait with a staff member?"
	Youth 16 and 17 Years of Age
	"I would like to call Bruce Grey Child and Family Services about the concerns you have shared."
	"Bruce Grey Child and Family Services works with students to help keep them safe and offer resources to you."
	"Would you like to be present while I make these calls or would you like to wait while with a staff member?"
	YOUTH 16 AND 17-YEAR-OLDS ONLY a) Determine the student's wishes about you calling BGCFS. b) document and consult with your principal. Principals will report immediately to their area superintendent for further consultation if the youth does not want BGCFS called.

SCENARIOS AND QUESTIONS	SAMPLE RESPONSE
The student identifies to you they do not want their	"I'm hearing that you really do not want me to call your parents/guardians/caregivers about what has been going on."
parents/guardians/ caregivers to know	"Can you help me better understand what your concerns are with your parents/guardians/caregivers knowing?"
	➤ OR "How you think they might respond?"
	 If you are concerned that the student's safety will be negatively affected by a call to parents/guardians/caregivers, notify your principal, who will call your area superintendent for further consultation.
	II. If the student is 16 or 17 and has withdrawn from parental control, no call is to be placed to parents/guardians/caregivers by the principal.
The student identifies to you that they do not	> "I understand that you have concerns about a call being made to the police."
want police involved	"We work with the police to get students help."
	"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."
	"Would you like to be with me while I make the call or would you prefer to wait with 'X' staff member?"
	 Notify your principal, who can call for consultation with the superintendent or learning services administrator-student support (responsible for safe schools).
	II. Persons experiencing, or involved in, the disclosed exploitation may be hesitant and worried about police involvement for reasons such as distrust of police, safety concerns, fear of retaliation from perpetrator, impact on involved persons, negative social stigma, and/or fear of being persecuted/ charged for associated criminal activity while involved in the trafficking situation (i.e., substances abuse, recruitment, luring/grooming of peers).
	III. Suggested response is to take a trauma-informed approach centred on the victim/survivor, by validating their concerns, being transparent about the process, and emphasizing that police are being engaged to help ensure their safety. This may also involve connecting the student to supportive services to help them navigate this process or offering to be present throughout the process as a caring adult for comfort/ support.
The student identifies to you they do not	For students under 16 years of age:
want Bruce Grey Child and Family Services involved	"I understand that you do not want a call to be made to Bruce Grey Child and Family Services."
	"Bruce Grey Child and Family Services are here to be a resource to youth when they may be unsafe."
	"I need to call them because I am concerned for your safety. The laws in Ontario require me to call when I have a concern for a student's safety."
	For students 16 and 17 years of age:

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SCENARIOS AND QUESTIONS	SAMPLE RESPONSE
	"I understand that you do not want a call to be made to Bruce Grey Child and Family Services."
	"I am concerned for your safety and want to connect you with this agency to offer you some more resources right now."
	"Bruce Grey Child and Family Services provide services and supports to 16 and 17-year-olds who may be in need of protection."
	> "I am going to need to speak with the principal about your wishes that I do not call."
	I. Immediately call your principal. Principals can contact their Superintendent to determine whether a call will be made to Bruce Grey Child and Family Services. The decision must be documented. The Learning Services Administrator responsible for Social Work and the board attendance counsellor may be available for additional consultation.
	II. Some students may worry about the impact of BGCFS becoming involved on their parents/guardians/caregivers or a younger sibling.
The student identifies that they do not want school mental health	"The principal needs to involve the mental health worker to help connect us to resources to assist you, (e.g. safe housing, counselling support)."
supports involved	> "Can we (you and administrator) make an introduction to them with you?"
	If the student still does not want board mental health worker involvement:
	> "I hear you saying you do not want our board mental health worker involved."
	> "I am aware of other outside services that may feel more comfortable for you."
	> "A few examples are" e.g., BGCFS, Keystone, Ontario Provincial Police (OPP)
	"Can I help connect you and/or give you information about these services? They are very experienced in dealing with situations like what you are experiencing and may be able to help."
	Administrators can access a learning services administrator or area superintendent for consultation about sex trafficking cases.
	II. Staff should seek support from the school administrator about what community partnership/community resources may be available.
	III. Students do not have to meet with the mental health worker for counselling or support.
The student does not want community	"I understand that you do not want any resources involved to offer you some support right now."
resources involved	"I want you to know that if you change your mind, we (the school) can connect you at any time."
	> "The door is always open."

SCENARIOS AND QUESTIONS	SAMPLE RESPONSE
	"If you do not want to talk to me about it, you can find information through our board mental worker as well."
	"Is there another staff member who you have a good relationship with that you would like to connect with?"
	> "We care about you and want to ensure that you have support."
	I. You may wish to share the Canadian Human Trafficking Hotline at 1-833-900-1010. It connects victims and survivors of human trafficking to specialized antihuman trafficking services and supports, emergency shelters, transition housing, long-term supports, counselors, and a range of other trauma-informed services and where applicable, law enforcement.
	The hotline is also an entry-point for individuals interested in learning more about specialized human trafficking restraining orders. Services offered in 200+ languages and are accessible to the deaf, hard-of- hearing and non-verbal.
	II. Ensure that your principal is made aware of the conversation with the student. The principal needs to discuss resource options with the student.
The student becomes upset, agitated, denies, or attempts to retract the earlier	"We understand that you may/do not want me/the principal to share this information with other persons/agencies" (e.g., local police and Bruce Grey Child and Family Services)
disclosure	"We understand that this is upsetting that the principal needs to call Bruce Grey Child and Family Services."
	"We can work together to share information with Bruce Grey Child and Family Services, and/or local police, about what the concerns are at this time. Is there something we (you and principal) can do to make this feel safer for you?"
	"We must contact these persons/agencies because they are here to help young people who may be involved in potentially unsafe situations."
	"What you have told me today has us very concerned for your safety and well-being."
	"I know that you may feel that everything is okay or safe, but we are really worried about you and we think we need more help right now."
	> "We will be here with you. We will figure this out together."
	> "Is there something more we can do or offer to be supportive right now?"
	I. This conversation should happen jointly with your principal.
	II. Please refer to PPM 9 and duty to report obligations.

Students

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SCENARIOS AND QUESTIONS	SAMPLE RESPONSE
The student expresses fear for their safety if police, child	"Thank you for telling me that you are feeling scared about what will happen if we call persons/agencies."
protection, and/or other resources are	➤ "I am hearing that you do not want this."
contacted	"I need to call the principal for more support and information about what are our next steps."
	Figure 1 am going to ask you to wait with X staff member while I make a phone call."
	I. Principal will determine next steps in coordination with their area superintendent.
	II. Do not promise the student that a call will not be made.

ADMINISTRATIVE PROCEDURE
Students

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APPENDIX C: ADMINISTRATOR RESPONSE SUPPORTS - SUPPORTING DISCLOSURES OR SUSPICIONS OF SEX TRAFFICKING

TASK	SUPPORTS
Duty to Report Child Sex Trafficking to Bruce Grey Child and Family Services	 Section 125 of the Child, Youth and Family Services Act, 2017 (CYFSA) states that the public, including professionals who work with children, must promptly report any suspicions that a child is or may be in need of protection to a children's aid society.
	II. Amendments with respect to child sex trafficking have been made to the CYFSA that impact the duty to report. These amendments add a duty to report suspicions that a child is in need of protection because they are at risk of, or are victims of, child sex trafficking.
	III. A professional, or member of the public, who is concerned that a 16-or 17-year-old is or may be in need of protection due to child sex trafficking may, but is not required to, make a report to a children's aid society. The youth's consent is not required for a professional to make a report. Children's aid societies are required to assess all reports that a child is in need of protection.
	IV. These amendments come into effect on October 1, 2021. Please see PPM9 "Duty to Report Children in Need of Protection" for more information.
Contacting Parents/Guardians/ Caregivers	I. In instances of suspected or disclosed sex trafficking to school staff, administrators notify parents/guardians/caregivers to share the concern (in accordance with applicable board policies and administrative procedures). Notification procedures may vary or may not be applicable depending on age of the student (e.g., students 18 years of age or older, or who are 16 or 17 years old and have withdrawn from parental control).
	II. Exceptions to parent/guardian/caregiver communication include:
	 a) Situations where students share information with you which leads you to believe that contacting parents/guardians/caregivers will increase safety concerns for the student or negatively impact their well-being, phone your school superintendent AND/OR the school board staff responsible for safe schools matters for an immediate consultation. b) If directed by local police or a children's aid society not to call the parents/guardians/caregivers.
Consultation Support	When you have cases of suspected or disclosed sex trafficking identified or disclosed to you, reach out for consultation and support. If you believe that a child under 16 is in need of protection due to child sex trafficking, you have a duty to report your concerns directly to a children's aid society. Boards staff should consult with their local police/school board protocol, and other relevant policies/procedures.
	II. Who to reach out to and for what:

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TASK	SUPPORTS
	a) area superintendent
	 general questions, determining a call to parents/guardians/ caregivers, or a children's aid society
	b) learning services administrator – student support
	 process for reporting, calling local police
	c) learning services administrator – student support
	 accessing school social work or community resources.
	d) Bruce Grey Child and Family Services:
	 reporting concerns that a child is or may be in need of protection due to child sex trafficking.

SAMPLE ADMINISTRATOR SCRIPTS

Sample administrator scripts for responding to, and supporting students with, suspicions or disclosures of sex-trafficking (Please refer to AP 6824-D. Please consult with your area superintendent of education for advice.)

Please always keep the following in mind:

- Do not leave the student alone.
- Ensure staff are not discussing the issue in hallways or public spaces, including staff workrooms or the lunchroom.
- Remember your obligations related to privacy and access to information, in accordance with board policy BP 1408-D "Privacy and Information Management" (and related procedures), as well as the <u>Information and Privacy Commissioner of Ontario's Privacy and Access to Information in Ontario Schools: A Guide for Educators</u>

SCENARIOS AND QUESTIONS	SAMPLE RESPONSE		
Staff member identifies/ reports a suspected or disclosed case of sex trafficking to administrator	 "Staff Member X shared with me information today because they are worried for your safety and well- being." "I appreciate you trusting us to share what has been happening to you." 		
Administrator suspects or receives a disclosure of sex trafficking from a student	 "Thank you for trusting me and 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." 		
Response to suspected or disclosed sex trafficking	 "My role as your school principal is to try to understand what might be happening or what you are experiencing, and to get help." "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 or that someone may be hurting them, I need to reach out for help from resources in our community." "I would like to call our learning services administrator—student support for help 		

SCENARIOS AND QUESTIONS	SAMPLE RESPONSE				
	in finding resources and offering immediate support to you. Would you be okay with this?"				
	"I need to call your parents/guardians/caregivers 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 X staff member?"				
	(NOTE: STUDENT CANNOT BE LEFT ALONE)				
	Youth Under 16 Years of Age				
	"I need to call the local police and Bruce Grey Child and Family Services about the information you shared."				
	"The Local police and Bruce Grey Child and Family Services work with students and schools to help student stay safe."				
	"Would you like to be present while I make these calls, or would you like to wait with Staff Member X?"				
	Youth 16 and 17 years of age				
	 "I need to call the local police about the information you shared." "I would also like to call Bruce Grey Child and Family Services about the concerns you have shared." 				
	"Both the local police and Bruce Grey Child and Family Services work with students to help keep them safe and offer resources to you."				
	"Would you like to be present while I make these calls or would you like to wait while with Staff Member X?"				
	16 and 17-year-olds ONLY				
	 Determine what the student's wishes about you contacting BGCFS -document and report immediately to your area superintendent if they do not want BGCFS called for further consultation. 				
The student identifies to you that they do not want their	"I'm hearing that you really do not want me to call your parents/guardians/caregivers about what has been going on."				
parents/guardians/ caregivers to know	"Can you help me better understand what your concerns are with your parents knowing? Or how you think they might respond?"				
	If you are concerned that the student's safety will be negatively affected by a call to parents/guardians/ caregivers call your Superintendent for further consultation before placing a call.				
	II. If the student is 16 or 17 years of age and has withdrawn from parental control, no call is placed to parents, guardians, or caregivers.				

SCENARIOS AND QUESTIONS	SAMPLE RESPONSE	
The student identifies to you that they do not	> "I understand that you have concerns about a call being made to the police."	
want police involved	"We work with the police to get students help. 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. Would you like to be with me while I make the call, or would you prefer to wait with Staff Member X?"	
	Consult with Learning Services Administrator responsible for Safe Schools or other staff per board procedure.	
	II. Persons experiencing or involved in the disclosed exploitation may be hesitant and worried about police involvement for reasons such as distrust of police, safety concerns and fear of retaliation from perpetrator, impact on involved persons, negative social stigma, and/or fear of being persecuted/charged for associated criminal activity while involved in the trafficking situation (i.e. substances abuse, recruitment, luring/grooming of peers).	
	III. Suggested response is to take a trauma-informed approach centred on the victim/ survivor, by validating their concerns, being transparent about the process, and emphasizing that police are being engaged to help ensure their safety. This may also involve connecting the student to supportive services to help them navigate this process or offering to be present throughout the process as a caring adult for comfort/support.	
	IV. School boards and educators are encouraged to learn more about anti-human trafficking resources in their community including the organizations listed on <u>Human trafficking Ontario.ca</u> and local anti- human trafficking coalitions which often include law enforcement in their membership.	
The student identifies	L Chudanta un day 40 years of ana	
The student identifies to you that they do not want Bruce Grey Child and Family Services	 Students under 16 years of age "I understand that you do not want a call to be made to Bruce Grey Child and Family Services." 	
involved	"Bruce Grey Child and Family Services are here to be a resource to youth when they may be unsafe."	
	"I need to call them because I am concerned for your safety."	
	"The laws in Ontario require me to call when I have a concern for a student's safety."	
	II. Students 16 and 17 years of age	
	"I understand that you do not want a call to be made to a Bruce Grey Child and Family Services."	
	"I am concerned for your safety and want to connect you with this agency to offer you some more resources right now."	
	"Bruce Grey Child and Family Services provide services and supports to 16 and 17-year-olds who may be in need of protection."	

SCENARIOS AND QUESTIONS	SAMPLE RESPONSE	
	 "I am going to need to speak with another colleague/ my boss (your superintendent) about your wishes that I do not call." III. Immediately call your area superintendent to determine whether a call will be made to Bruce Grey Child and Family Services, depending on board procedures. The decision must be documented. The learning services administrator responsible for mental health and attendance counsellor may be available for additional consultation. 	
	IV. Some students may worry about the impact of Bruce Grey Child and Family Services becoming involved with their parents, guardians, caregivers, or a younger sibling.	
The student identifies that they do not want board mental health support involved	"I need to involve the mental health worker to help me as the administrator to help connect us to resources to assist you (e.g., safe housing, counselling support)."	
	"Can I make an introduction to them with you?"	
	If the student still does not want mental health worker involvement: "I hear you saying you do not want our school mental health worker involved." "I hear you saying you do not want our school mental health worker involved."	
	"I am aware of other outside services that may feel more comfortable for you. A few examples are" BGCFS, Keystone, OPP.	
	"Can I help connect you and/or give you information about these services? They are very experienced in dealing with situations like what you are experiencing and may be able to help."	
	II. Administrators can access a school mental health worker for consultation about sex trafficking cases.	
	III. Seek support from the learning services administrator about what community partnership/community resources may be available.	
	IV. Students do not have to meet with the school mental health worker for counselling or support.	
The student does not want community resources involved	"I understand that you do not want any resources involved to offer you some support right now.	
	I want you to know that if you change your mind, we (the school) can connect you at any time. The door is always open."	
	"If you do not want to talk to me about it, you can find information through our school mental health worker as well. Is there another staff member who you have a good relationship with that you would like to connect with? We care about you and want to ensure that you have support."	
	I. You may wish to share the Canadian Human Trafficking Hotline at 1-833-900-1010.	

SCENARIOS AND QUESTIONS	SAMPLE RESPONSE	
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	II.	The hotline connects victims and survivors of human trafficking to specialized anti-human trafficking services and supports, emergency shelters, transition housing, long-term supports, counselors, and a range of other trauma-informed services and where applicable, law enforcement.
	III.	The hotline is also an entry-point for individuals interested in learning more about specialized human trafficking restraining orders. Services offered in 200+languages and are accessible to the deaf, hard-of-hearing and non-verbal.
The student becomes upset, agitated, denies, or attempts to retract the earlier disclosure	>	"I understand that you may/do not want me to share this information with other persons/agencies" e.g., local police and/or BGCFS
	A	"I understand this is upsetting that I need to call the Bruce Grey Child and Family Services. We can work together to share information with the Bruce Grey Child and Family Services and/or local police about what the concerns are at this time.
	A A	Is there something I can do to make this feel safer for you?" "I must contact these persons/agencies because they are here to help young people who may be involved in potentially unsafe situations."
	>	"What you have told me today has me very concerned for your safety and well-being."
	>	"I know that you may feel that everything is okay or safe, but I am really worried about you and I think we need more help right now."
	>	"I will be here with you. We will figure this out together. Is there something more I can do or offer to be supportive right now?"
	I.	Please refer to AP 6850-D and duty to report obligations.
The student expresses fear for their safety if police, child protection, resources are contacted	A	"Thank you for telling me that you are feeling scared about what will happen if we call persons/agencies."
	>	"I need to call my supervisor for more support and information about what our next steps are."
	>	"I am hearing that you do not want this."
	>	"I am going to ask you to wait with Staff Member X while I make a phone call."
	I.	Contact your area superintendent and the learning services administrator responsible for Safe Schools for an immediate consultation.