

# HWDSB

## Hamilton Wentworth District School Board

### *Anti-Sex Trafficking School Board Protocol*

#### PURPOSE

*The Hamilton-Wentworth District School Board (HWDSB) Anti-Sex Trafficking Protocol* reflects HWDSB's commitment to providing safe, healthy, welcoming, and inclusive learning environments where students feel connected, valued, empowered and engaged. The HWDSB Protocol includes the principles and practices of inclusion, diversity, equity, and accessibility in its development and response to The Policy/Program Memorandum 166 Keeping Students Safe: Policy Framework for School Board Anti-Sex Trafficking Protocols (PPM166) which sets a strong foundation for Ontario school boards to build local anti-sex trafficking protocols.

HWDSB teachers and other staff are well positioned to support student safety and well-being, to teach and promote healthy relationships, to educate about prevention of various forms of harm, as well as to notice troubling changes in behaviour and connect with students as caring adults. HWDSB recognizes that students are not only a target for being trafficked but may also be involved in the trafficking of their peers.

The HWDSB Anti-sex Trafficking Response Protocol and Community Resource Guide will continue to build up the capacity and knowledge of HWDSB staff about the tactics of luring and grooming students. The HWDSB will continue to collaborate with those with lived experience, community partners, other local school boards, HWDSB staff, community members, and students to leverage their respective expertise in prevention and to develop appropriate intervention.

#### DEFINITION OF SEX TRAFFICKING AND CONTEXT SETTING

In Ontario, the vast majority of police-reported cases of human trafficking involve sexual exploitation (sex trafficking); however, it should be noted that they are two separate Criminal Code offences. Sex trafficking 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 and/or deception.

Human trafficking is one of the fastest-growing crimes worldwide. In Canada:

- 95% of victims / survivors of police-reported human trafficking were women and girls.
- 22% of police-reported victims / survivors of human trafficking are children under the age of 18.5.
- The majority of all police-reported incidents of human trafficking in Canada occur in Ontario.
- Most victims / survivors of sex trafficking in Canada are trafficked by someone they know.

When a minor is involved in the sex trade, they are not sex workers, but a sexually exploited child or youth. Therefore, the term sexual exploitation can be used to describe all instances in which youth

exchange sexual acts for money, drugs, shelter, food, clothing or anything of monetary value. Sexual exploitation can be used regardless of whether there is a trafficker or if there are other circumstances which prompt a youth to engage in the sex trade (from Guide for Supporting Trafficked Persons - Hamilton's Anti-Human Trafficking Coalition – HHTC).

Most students who are trafficked for the purpose of sexual exploitation are girls. While any student can be sex trafficked, systemic issues like poverty and racism increase vulnerability for some students.

HWDSB recognizes that colonization is the root cause of the disproportionate number of Indigenous girls, women, boys and young men being sex trafficked. Addressing this issue requires critically reflecting on our practices across the system through anti-colonial and anti-racist lenses. HWDSB recognizes the need for ongoing collaboration with the Indigenous Education Team and Indigenous communities, families, and students.

## STATEMENT OF PRINCIPLES

### 1. HWDSB Board and School Staff Roles and Responsibilities

The HWDSB and all its schools have an integral role in combatting the sexual exploitation of children and youth. Staff will be equipped through regular training to increase awareness and knowledge, provide appropriate tools, and the necessary skills to recognize signs of sex-trafficking and how to respond to protect children and youth.

### 2. Roles for HWDSB Parents/Guardians/Caregivers

Parents/guardians/caregivers HWDSB school councils, the Parental Involvement Committee, the Special Education Advisory Committee and various other Board committees, along with community partners, and parents/guardians/caregivers are key in the implementation and review of the HWDSB Protocol.

Care will be taken when inviting parents/guardians/caregivers and families to engage with anti-sex trafficking matters and to ensure sufficient supports are available, whether seeking input or in sharing a disclosure. Outreach to Indigenous parents/guardians/caregivers, as well as outreach to Black and racialized parents/guardians/caregivers, will strive to be trauma-informed and will recognize historic and systemic barriers that may impact their participation. Every effort will be made to reduce cultural and/or linguistic barriers when reaching out to parents/guardians/caregivers about this work.

### 3. HWDSB Student Input

All students have a right to be protected from sexual exploitation at school and in the broader school community. Students are at the center of this work and will be involved in efforts to create awareness and develop actions against sex trafficking. The Student Senate, various school-based student groups and students will be invited to participate, review and inform the HWDSB Protocol.

### 4. Build Multi-sectoral Relationships with Community Organizations

The HWDSB recognizes the important contribution of those with lived experience, community organizations and agencies that have expert knowledge in anti-sex trafficking and interest in child

and youth safety. The HWDSB will work in collaboration with community organizations and agencies for education, training, interventions and supports for students and staff so they can work towards eradicating sex trafficking in HWDSB and the Hamilton community. These efforts will strive to be responsive to diverse students and the needs of local school communities. Appendix A includes a list of community agencies who have provided input and will be invited to continue implementation work with the Board. The list is not exhaustive and the HWDSB will continue to seek out new partners and agencies to work with.

#### 5. Safe Interventions

Caring adults 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, in the school and in the community.

Board staff will receive regular anti-sex trafficking training, relevant to their role and appropriate to the level of expected response. Staff will be trained to identify the signs of sex trafficking and to safely respond to disclosures. The responses will be culturally relevant and responsive to diverse student populations. 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. Training will be provided via a variety of modes, and include resources, an awareness of community supports and an awareness of the pathways to the appropriate Board staff and community agencies to ensure that interventions are safe. Training for staff will be tracked, periodically updated and available throughout the year.

#### 6. Respect for Confidentiality, Privacy and Informed Consent

HWDSB will ensure that the privacy of all students identified or impacted by sex-trafficking will be protected and respected 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. In addition, full and informed consent from student of concern and impacted students will be sought, whenever possible, before acting.

All staff will learn about the requirement to respect confidentiality and that in situations of disclosure, they and the student fully understand how the student's information will be used and with whom it may be shared.

Parents/guardians/caregivers and relevant agencies e.g., Children's Aid Society, Hamilton Police Services, etc., will be informed about suspicions or a direct disclosure, unless the student is 18 years or older; 16 or 17 years old and has withdrawn from parental control; or it is determined that in doing so would put the student at risk of harm from a parent/guardian/caregiver of the student, such that the notification is not in the student's best interest.

For any questions or concerns about privacy at HWDSB, please contact our Privacy Office at [privacy@hwdsb.on.ca](mailto:privacy@hwdsb.on.ca) or 905-527-5092 ext.2259

#### 7. Build School-based Prevention

The HWDSB Protocol complements existing prevention efforts in HWDSB schools, through knowledgeable and caring staff, curricula and professional development including the teaching of consent, healthy relationships and healthy sexuality. These teachings are integrated in all areas of a student's school experience: academics, co-curricular, experiential learnings, etc., and support the prevention and intervention of child exploitation. A training focus will be the awareness and understanding of the historical and social context of sex trafficking and that intentionally implemented prevention strategies, that are responsive to the needs of students, play a significant role in the prevention of sex trafficking.

#### 8. Promote Equitable and Culturally Safer Responses

The *HWDSB Protocol* is predicated on a human rights-based, non-judgmental, culturally responsive, survivor-centered and trauma-informed approach to raise awareness, prevent, identify and respond to sex trafficking.

#### ACCOMPANYING DOCUMENT: (*HWDSB RESPONSE PROTOCOL AND COMMUNITY RESOURCE GUIDE*)

The HWDSB will develop an accompanying HWDSB Anti-sex Trafficking Response Protocol and Community Resource Guide document to support the implementation of the actions found in the *HWDSB Protocol*. The *HWDSB Response Protocol* document will include the following components:

##### 1. Strategies to Raise Awareness, Prevent and Respond to Sex Trafficking

The *HWDSB Anti-Sex Trafficking Response Protocol and Community Resource Guide* document will include culturally safer strategies to raise awareness about sex trafficking with students, school board employees, parents/guardians/caregivers, and the broader school community. The *HWDSB Response Protocol and Community Resource Guide* document will be co-created with HWDSB staff, parents/guardians/caregivers, students, and with knowledgeable community organizations with relevant expertise.

Through targeted consultation with Indigenous, Black, and racialized communities, as well as with other appropriate agencies, e.g., newcomer support, the *HWDSB Response Protocol and Community Resource Guide* will address the barriers to participation that Indigenous, Black, racialized, newcomer and other parents/guardians/caregivers may face.

Within the *HWDSB Response Protocol and Community Resource Guide* diverse methods will be used to create awareness: e.g., letters/emails, HWDSB School Messenger, student handbook, posters, parent/guardian information sessions, School Council meetings, PIC Meetings, school/school board social media accounts, HWDSB website. Information will include support and resources, such as the phone number for the Canadian Human Trafficking Hotline, to raise awareness about the confidential services it offers.

Included in the *HWDSB Response Protocol and Community Resource Guide* will be:

A process to raise awareness among parents/guardians/caregivers about:

- cyber-safety;

- signs where a student is being targeted, lured, groomed, trafficked or is trafficking another student;
- pathways to accessing help via various sources including but not limited to HWDSB school and school board personnel, community providers, support hotlines, etc.; and,
- reporting concerns to HWDSB school and/or school board personnel, as well as to appropriate community organizations. A process for anonymous reporting, and a process for HWDSB responding to concerns.

A process to raise awareness among students about:

- signs a student is being targeted, lured, groomed, trafficked or is trafficking another student;
- how to bring concerns about luring, grooming, recruitment or exiting sex trafficking to the school without fear of reprisal, through various modes, including anonymous reporting.

The applicability of the HWDSB 21<sup>st</sup> Century Learning Policy (6.1) and Responsible Use Procedure to deter potential situations involving students who could be at risk of sex trafficking and other online threats, while using school board-provided technology.

The *HWDSB Response Protocol and Community Resource Guide* will also include guidance for responding from a trauma-informed lens to address the needs of:

- students who are being trafficked, particularly those students with special education needs; mental health needs; social or emotional needs; or those who require language/cultural accommodations; international students; students who are in care, receiving care or in customary care arrangements;
- students who may be involved in the recruiting of other students;
- students who are returning to school after they have been involved in a trafficking situation;
- students 18 years or older or who are 16 or 17 years old and have withdrawn from parental control;
- parents/guardians/caregivers, particularly those who may live overseas and/or may not speak English or French.

The *HWDSB Response Protocol and Community Resource Guide* outlines the legal obligations of the HWDSB in their Duty to Report: if there are concerns that a student is in need of protection, inclusive of situations where a child is at risk of, is being or has been sexually abused or sexually exploited, school board employees must meet their obligations under:

- The [Education Act](#)
- The [Child, Youth and Family Services Act, 2017](#)
- [The Ontario College of Teachers Act, 1996 / Professional Advisory](#)
- [Policy/Program Memorandum 9: Duty to Report Children in Need of Protection](#)
- [HWDSB Duty to Report](#)

There will be a designated contact person within the HWDSB who is familiar with the school board anti-sex trafficking protocol and can support school board employees with response protocols.

The *HWDSB Response Protocol and Community Resource Guide* will include information pertaining to the response required for school and board activities (e.g., field trips, overnight excursions, board-sponsored sporting events and board-operated before- and after-school programs).

The *HWDSB Protocol* and the *HWDSB Response Protocol and Community Resource Guide* will be posted on the HWDSB public website and will be available in hard copy upon request. Further, upon request and to the extent possible, the materials will be translated in other languages, and will be compliant with *the Accessibility for Ontarians with Disabilities Act (AODA)*.

## 2. Training for HWDSB School Board Employees

All HWDSB school board employees, including teachers, administrators, and other school staff, will be provided with anti-sex trafficking training. Training will be provided both in-person and online, in a variety of modes, to accommodate participation, accessibility, and renewal/review

Within the *HWDSB Response Protocol and Community Resource Guide*, the following elements for HWDSB staff training will be included:

- raising awareness, prevention, and responding to sex trafficking;
- key definitions, common misconceptions and myths about sex trafficking;
- tactics used for online luring, grooming and recruitment;
- supports available to students and affected staff, including culturally responsive supports;
- help for staff to understand and safely respond to sex trafficking;
- roles and responsibilities of school board employees;
- tracking and documenting annual training sessions;
- availability of training opportunities throughout the year for new and existing HWDSB employees.

## 3. Measuring Success: Accountability and Evaluation

Within the *HWDSB Response Protocol and Community Resource Guide*, the following elements for measuring success will be included:

- The *HWDSB Protocol* will seek feedback in the first year of implementation and will be reviewed, at minimum, every five years.
- The HWDSB will report to the Ministry of Education, upon request, the Board's activities with respect to the *HWDSB Anti-Sex Trafficking Protocol*.
- The HWDSB will collaborate with their community partners, e.g., the Children's Aid Society of Hamilton, the Hamilton Regional Indian Centre, the Hamilton Police Services, in reviewing performance indicators and measuring outcomes in preventing children and youth from sex trafficking, exiting from sex trafficking, etc., within the Hamilton community.

The Hamilton-Wentworth District School Board acknowledges the contributions of the following in the development of the draft *HWDSB Protocol*:

Dufferin Human Trafficking Service Providers Committee  
York Catholic District School Board  
Hamilton Catholic District School Board

## Hamilton Anti-Human Trafficking Coalition

### APPENDIX A

These agencies and school boards collaborated to develop the HWDSB Protocol.

#### Hamilton Community Agencies and Organizations:

1. Catholic Children's Aid Society of Hamilton
2. Children's Aid Society of Hamilton
3. Centre De Sante Communautaire: Domestic Violence and Sexual Abuse Team
4. Good Shepherd Women's Services
5. Hamilton Anti-Human Trafficking Coalition
6. Hamilton Police Services: Crime Prevention Branch; Human Trafficking Unit
7. Hamilton Regional Indian Centre
8. Interval House
9. John Howard Society of Hamilton, Burlington & Area
10. Ministry of Children, Community and Social Services: Youth Justice Services
11. Sexual Assault Centre Hamilton and Area
12. YMCA Hamilton, Burlington and Brantford: Anti-Human Trafficking Initiatives

#### School Boards:

1. Conseil Scolaire Viamonde
2. Mon Avenir Conseil Scolaire Catholique
3. Hamilton-Wentworth Catholic District School Board
4. Hamilton-Wentworth District School Board

## APPENDIX B

### Anti-Sex Trafficking Response Protocol

#### TERMINOLOGY:

**Anti-racism:** A proactive and consistent process of acknowledging racism and of seeking to identify, challenge, disrupt and eliminate racism in all its forms (individual, institutional, systemic).

**Colonialism:** The policy or practice of acquiring full or partial political control over another country, occupying it with ‘unsettlers’, and exploiting it economically. In Canada, this historically and currently means that Western European-derived ways of being, believing, knowing and doing are implicitly or explicitly imposed as the standard or norm. Colonialism remains embedded in the legal, political and economic context of Eurocentric Canada today and in the lived experience of marginalized Indigenous peoples. For example, the Indian Act and the Canadian institutions known as Indian Residential “Schools”, historic provincial child welfare misapplications and non-Indigenous peoples’ refusal to acknowledge the land and treaty rights of Indigenous people continues to contribute to this legacy.

**Culturally Responsive Services:** In this protocol context, culturally responsive approaches mean providing services in ways that respect and take into consideration the relevance of the beliefs, backgrounds, practices, cultural, linguistic and other needs of the diverse communities in HWDSB environments, especially those that have historically and currently experienced discrimination. Culturally responsive services intentionally consider diverse cultural approaches, strengths, perspectives and experiences of the communities that are being served to make the service more welcoming, accessible, appropriate, relevant and fair.

**Cultural Safety:** An environment that is spiritually, socially, emotionally and 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.

**Disclosure:** When a child or youth shares about any form of abuse, it is called a disclosure. Disclosures can be purposeful or accidental. Purposeful disclosures happen when a child or youth tells someone else, such as a friend, caregiver, or other adult. Accidental disclosures often happen when someone else encourages a child to talk or the child doesn’t intend to tell. Accidental disclosures are common with younger children and may come out through role playing, or drawing. Accidental disclosures can also be seen when a child displays ‘warning sign’ behaviors.

**Gender-Based Violence (GBV):** Violence committed against someone based on their gender identity, gender expression or perceived gender.

**Grooming:** Befriending and establishing an emotional connection with a child and sometimes the family to lower the child’s inhibitions, with the objective of sexual abuse. Often the grooming is performed in the hopes of trapping the minor into sex trafficking (One Child, 2019).



**Pimp Grooming:** Befriending and establishing a relationship with a minor in the hopes of recruiting them into becoming a sex trafficker. This process involves the teaching of how to control the victim, abuse tactics and ways to earn money quickly to support their gang (One Child, 2019).

**Human trafficking:** Section 279.01 (1) of the Criminal Code of Canada defines “trafficking in persons” or human trafficking as the act of recruiting, transporting, transferring, receiving, holding, concealing or harboring a person or exercising control, direction or influence over the movement of a person, for the purpose of exploiting them or facilitating their exploitation.

Within the communities served by HWDSB, most service providers use the term human trafficking in this area of work. For this protocol, and in our work with community partners, we will be using sex trafficking for clarity.

**Sex Trafficking:** As outlined in the Ministry of Education’s PPM-166, “sex trafficking is a form of sexual exploitation and is a crime under the Criminal Code of Canada. It can include recruitment, harboring, transporting, obtaining or providing a person for the purpose of sex. It involves force, physical or psychological coercion or deception. Most individuals who are trafficked for the purpose of sexual exploration are woman and girls, but all people may be targeted” (Government of Ontario, 2021, Definition of Sex Trafficking section).

**Sexual Abuse:** An actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.

**Sexual Exploitation:** Any actual or attempted abuse of a position of vulnerability, differential power or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another.

**Survivor:** An individual who has escaped a trafficking situation. May also can refer to those with lived experienced with sex trafficking. The term “impacted student” may also be used interchangeably with victim and/or survivor.

**Tactics:** Methods traffickers may use to target, recruit, manipulate and coerce trafficked persons. This can often involve a process of targeting an individual’s vulnerabilities then luring, grooming, isolating, manipulating, controlling and exploiting a trafficked persons to then conduct sexual acts (e.g., forcing a trafficked persons to have sex or to take images of child sexual abuse). Often, a trafficked persons may not be aware that exploitation is happening, and trafficked persons may be forced to recruit other trafficked persons.

**Trauma and violence informed approaches:** 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 or that only their trafficker can help them (One Child, 2019).

**Two-Spirit LGBTQIA+:** Two-spirit, lesbian, gay, bisexual, transgender, queer, questioning, intersex and asexual. Anti-racism refers to 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 and oppression.

**Victim:** 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. Impacted student may also be used interchangeably with victim and/or survivor. This approach is used for clarity and is not intended to label or define an individual's experience. Individuals who have experienced sex trafficking may prefer one term over another to describe their experiences.

### **Key Roles and Responsibilities**

#### **All HWDSB Staff:**

##### **Duty to Report**

Section 74(2) of the CYFSA defines what is meant by a "child in need of protection" and include references to physical, emotional, and sexual harm as well as neglect. Grounds for Protection now includes: the child has been sexually exploited as a result of being subjected to child sex trafficking; and / or there is a risk that the child is likely to be sexually exploited as a result of being subjected to child sex trafficking.

The CYFSA indicates that a child in need of protection includes not only one who has suffered maltreatment or neglect, but also one who is at risk of suffering maltreatment or neglect and there is a duty to report when there is risk of maltreatment.

For students under 16 years of age, (or up to 18 if the child is in the care or under the supervision of a children's aid society) as outlined in the Response Protocol, all staff should familiarize themselves with their responsibility to report any disclosures or suspicion of sex trafficking to the Principal/Vice Principal, parents/guardians/caregivers, Children's Aid Society (CAS/CCAS) and Hamilton Police Services (HPS) as applicable to their role.

The provision of the most recent Child Youth and Family Services Act (2021) allows for a person to report a child protection concern of a child 16 or 17 if they feel it is appropriate and necessary. HWDSB staff will ensure due diligence when reporting disclosures and concerns of sex trafficking to CAS/CCAS.

Please refer to the HWCDSD and HWDSB - CCAS and CAS Protocol for more information.

##### **Confidentiality - Informed Consent**

This procedure respects confidentiality and ensures the student fully understands how their information may be used or with whom it may be shared. It is key to develop referral relationships with community service organizations while adhering to applicable legal requirements, including those under the Municipal Freedom of Information and Protection of Privacy Act; the Ontario Human Rights Code the Accessibility for Ontarians with Disabilities Act, 2005; the Education Act; and the Child, Youth and Family Services Act, 2017. (HWDSB)

Staff require consent to inform parents/guardian if the student is 18 years or older; and may not inform parents/guardian if the student is 16 or 17 years old and has withdrawn from parental control; or it is determined that informing a parent/guardian/caregiver would put the student at risk of harm from a parent/guardian/caregiver.

### **Commitment to a Culturally Responsive Approach**

The HWDSB demonstrates a human rights-based, non-judgmental, culturally responsive, survivor centered, and trauma-informed approach to raising awareness, preventing, identifying, and responding to sex trafficking. Student/ Human Rights under the Ontario Human Rights Code, and Ontario Education Act.

### **Responding and Reporting**

The following procedures support and provide guidance to school board employees in relation to responding to different phases of students involved with sex trafficking:

- There are warning signs, or information has been shared that a student being targeted, lured or groomed into sex trafficking
- There are warning signs, or information has been shared that a student is being sex trafficked.
- There is concern, or information has been shared that a student may be targeting, luring, grooming, or recruiting children and youth for the purpose of sex trafficking.
- A student is returning to school after they have been trafficked or involved in the trafficking of others.

**For any concerns of suspected sex trafficking or directly reported disclosures of sex trafficking all staff will adhere to the following steps to support and intervene.**

**For students with special education needs, information in the student's Individual Education Plan must be considered.**

### **Duties and Responsibilities**

If there is concern, or information has been shared, that a student may be luring, grooming, or recruiting children and youth for the purpose of sex trafficking please refer to the Hamilton Police – School Board Protocol for responding to illegal activity.

### **1.0 Staff**

**No direct disclosure from impacted student**

1.1 If you are concerned that a student may be at risk of being sex trafficked (no disclosure from impacted student), notice warning signs of being lured or groomed for the purposes of sex trafficking or a student shares concerns that a peer is being lured, groomed or sex trafficked;

- Inform your principal/vice principal as soon as possible
- Do not put full names or information in an email or voicemail. Speak to your Principal/Vice Principal directly via phone or in person if possible.
- In conjunction with Principal/Vice Principal and appropriate school board personal determine if additional further conversations are appropriate with the student and their parent/guardian/caregivers
- Acknowledging that established trust between students and staff is a key element that enable disclosures to occur, the school staff with the most supportive relationship with the student should be involved in reaching out to the student and their family
- When contacting students and their families, prioritize face-to-face conversations whenever possible. It is not uncommon that a trafficked student's email, phone, and voicemail are being monitored. Do not leave detailed messages on a voicemail.
- In conjunction with appropriate school board personal determine if CAS/CCAS and Hamilton Police are to be involved.

Direct disclosure from the impacted student

1.2 When receiving a disclosure directly from a student, listen with empathy, take a non-judgmental stance and share next steps

- Remember making a disclosure is a vulnerable experience
- With care, inform the impacted student that you are concerned for their safety and are required to report any information or concerns about abuse/ illegal activity with the school principal/vice principal, parents/guardians/caregivers (if deemed safe) and possibly Hamilton Police and CAS/CCAS *See Duty to Report and Informed Consent Sections for additional information*
- Let the student take the lead in sharing, do not probe for additional information or promise secrecy
- Listen to student without judgement, and mirror their language (ex, if they use the term "boyfriend" use that term as well)
- Thank them for trusting you with their experience and explain in addition to your duty to report that your priority is the student's safety, and your role is to connect them with people/professionals that can be accessed confidentially
- Ensure the impacted student is aware of how their information will be documented and who has access to this information
- If the student identifies you as a key support, and you are able, you may be part of subsequent conversations between the student, HWDSB supports and community partners

- Prioritize supporting the student in a trauma and violence informed way, including not having them repeat their story multiple times.
- Receiving a disclosure can be an overwhelming experience, if you are struggling with the impact of the disclosure, please reach out to your principal/vice principal and/or a supportive colleague. Recognizing these can be challenging conversations see this We Help (LINK) resource for more information.

### 1.3 Contact School Principal/Vice Principal as soon as possible.

- Provide the principal/vice principal with the name and age of the student, reason for suspicion and or date of disclosure.
- Do not put full names or information in an email or voicemail. Speak to your Principal/Vice Principal directly via phone or in person if possible.
- Remain available for continued contact from Principal/Vice Principal, Police and CAS as needed.

### 1.4 Involve Children's Aid Society/Catholic Children's Aid Society

- For students under 16 years of age, staff MUST report to the CAS/CCAS;
- For students 16 and 17 years of age, may report to CAS/CCAS
- Inform principal/vice principal when this has been completed.
- CAS/CCAS Reporting documentation are to be followed

### 1.5 If there is an immediate threat to the student's safety call 911

- An Immediate threat may include;
  - Trafficker on site
  - Trafficker is going to pick up student from school
  - Student has plans to leave the city with their trafficker within the next 24 hours
- Do not leave the student alone
- Ensure the student remains supervised by school staff.
- Move to an area with privacy to avoid breaches of confidentiality.

## 2.0 Principal/Vice principal

### **No direct disclosure from impacted student**

For concerns or suspected sex trafficking (no disclosure), or warning signs of being lured or groomed for the purposes of sex trafficking

- Inform your Family of Schools Superintendent as soon as possible
- In conjunction with Family of Schools Superintendent, engage appropriate school board personal

- The school staff with the most supportive relationship with the student should be involved in reaching out to the student and their family
- When contacting students and their families, prioritized face-to-face conversations whenever possible. It is not uncommon that a trafficked student's email, phone, and voicemail are being monitored. Do not leave detailed messages on a voicemail.
- In conjunction with appropriate school board personnel determine if CAS/CCAS and Hamilton Police are to be involved

## Direct Disclosure from impacted student

### 2.1 When receiving a disclosure directly from a student, explain your role, listen and support.

- Remember making a disclosure is a vulnerable experience
- With care, inform the impacted student that you are concerned for their safety and obligated to disclose any information or suspicion about abuse/ illegal activity with the Family of School Superintendent, Manager of Social Work Services, Hamilton Police, and parents/guardians/caregivers (if deemed safe) and possibly CAS/CCAS *See Duty to Report and Informed Consent Sections for additional information.*
- Let the student take the lead in sharing, do not probe for additional information or promise secrecy
- Listen to student without judgement, and mirror their language (ex, if they use the term "boyfriend" use that term as well)
- Thank them for trusting you with their experience and explain in addition to your duty to report that your priority is the student's safety, and your role is to connect them with people/professionals that can be accessed confidentially
- Ensure the impacted student is aware of how their information will be documented and who has access to this information
- If the student identifies you as a key support, and you are able, you may be part of subsequent conversations between the student, HWDSB supports and community partners
- Prioritize supporting the student in a trauma-informed way, including not having them repeat their story multiple times.
- If you are struggling with the impact of the disclosure, please reach out to your Family of School Superintendent, a supportive colleague and/or Manager of Social Work Services.

### 2.2 If there is an immediate threat to the student's safety call 911

- An Immediate threat may include;
  - Trafficker on site
  - Trafficker is going to pick up student from school

- Student has plans to leave the city with their trafficker within the next 24 hours
- Do not leave the student alone
- Ensure the student remains supervised by school staff.
- Move to an area with privacy to avoid breaches of confidentiality.

### 2.3 Involve Child Protection Agency

- For students under 16 years of age, staff MUST report to the CAS/CCAS;
- For students 16 and 17 years of age, may report to CAS/CCAS
- If a staff member received the disclosure or suspects sex trafficking, verify staff has called CAS/CCAS and completed the report form

### 2.4 Contact Hamilton Police Services (HPS)

- If there is not an immediate threat, contact the non-emergency line
  - Inform the responding HPS staff that you suspect or have received a disclosure of sex trafficking
  - Request an incident number
- Document this call in the HWDSB Police Log

### 2.5 Contact the Family of Schools Superintendent and Indigenous Education Lead

- For Indigenous families, contact the Indigenous Education Lead
- If necessary, contact HWDSB Manger of Social Work Services for child protection questions. This does not negate the staff's duty to report.

### 2.6 Contact Parent/Guardians

- Review and integrate trauma-informed care as required
- Call parent/guardian except if:
  - Directed not to contact parent/guardian by child protection agency or Hamilton Police;
  - Student who is 18 years or older;
  - Student is 16 or 17 and has withdrawn from parental control;
  - Situations in which calling the parent/guardian would present a safety risk to the student (consult with HWDSB Manger of Social Work Services)

### 2.7 For all disclosures or suspicions of sex trafficking and disclosures document the following,

- Name and age of the student, reason for suspicion and/or date of disclosure and the name and position of staff who reported.
- Ensure the impacted student was informed of how their information will be documented and who has access to this information.
- Documentation will be stored in a confidential manner (not in the OSR or Power School). Copies of the completed form should not be made.
- CAS/CCAS Reporting Measures and documentation are to be followed

- Document police incident number in HWDSB Police Log
- Remain available for continued contact from Hamilton Police and CAS/CCAS as needed.

## 2.8 Develop a Safety/Re-entry Plan and Monitoring

- Develop a plan for safety and re-entry plan with the student in collaboration with relevant board staff family members and community partners, as applicable and with student consent (see Third Party Protocol)
- Regularly check-in with the student as outlined in the safety/re-entry plan(s).

## **In-School Interviews by Anti-Sex Trafficking Community Agencies**

The Education Act requires Principals/Vice Principals to ensure student records are protected and their confidentiality maintained. This includes taking reasonable steps to ensure the proper control and management of third parties who attend on school premises for any reason.

Should a request to provide anti-sex trafficking specific supports to a student be received from a third-party professional/paraprofessional (eg. Child and Youth Worker, social service worker or social workers) ask if the worker whether they have obtained parent/guardian/caregiver consent and why the interview needs to take place at the school; the worker's answer will determine the next steps, as follows:

- Student (under the age of 18) is still residing in their parent/guardian/caregiver's home and written consent has been obtained for students
  - Review nature and scope of consent.
  - Obtain a copy of the consent.
- Parent/guardian/caregiver written consent is not required if the student is 16 or 17 years old and has withdrawn from parental control. In Ontario, a person who is 16 or 17 years old has the legal right to withdraw from parental control. No court process is involved; therefore, no court or official documents are required.
- Principals/Vice Principals should attempt to make reasonable and diligent efforts to ensure the following:
  - The student in question is no longer residing with a parent/guardian/caregiver.
  - Such living arrangements do not appear to be temporary
  - The student is supporting themselves financially and/or
  - The student is no longer in communication with the parent/guardian/caregiver
- Informed consent from parents is not required if it is determined that informing a parent/guardian/caregiver would put the student at risk of harm from a parent/guardian/caregiver.



- If the Principal/Vice Principal decides not to notify the parent/guardian/caregiver, the Principal/Vice Principal must:
  - Inform the Superintendent of Safe Schools
  - document the rationale for the decision not to notify the parent/guardian/caregiver of the student

Third party professionals/paraprofessionals will provide their current affiliation (work badge) to school staff prior to providing service to students. A copy of their work identification is to be made and filed with the written consent.

Telephone communications must be verified through return calls from schools to agencies.

If you have questions, please contact the Manager of Social Work Services.

### **Awareness and Prevention:**

#### **TRAINING FOR HWDSB EMPLOYEES**

The HWDSB will commit to training all employees on Anti-Sex Trafficking protocols and procedures. Annual online training will occur at the onset of each subsequent school year alongside other mandatory training modules. New employees of HWDSB will receive training as part of their introductory hiring process. Each year all school-based staff will participate in training.

### **Accountability and Evaluation:**

The HWDSB will collaborate with the Ministry of Education, as well as anti-human trafficking partners, to develop a performance measurement framework. This framework will monitor the effectiveness of training (for example, whether staff feel they are more aware and more able to safely identify and intervene in situations where a student is suspected of being trafficked or trafficking) and whether the protocols respond to the needs of students.

Community anti-human trafficking partners and local agencies, such as child protective services like Hamilton Children's Aid Societies, will be invited to participate in the reporting process to determine how the protocols have helped children and youth in care stay out of, or exit, human trafficking. Ongoing progress will be monitored carefully with performance indicators on how the protocols are preventing trafficking in Hamilton.

### **REFERENCES:**

- PPM 9 Duty to Report Children in Need of Protection.  
<https://www.ontario.ca/document/education-ontario-policy-and-program-direction/policyprogram-memorandum-9>

- PPM 166: Keeping Students Safe: Policy Framework for School Board Anti-Sex Trafficking Protocols. <https://www.ontario.ca/document/education-ontario-policy-and-program-direction/policyprogram-memorandum-166>
- Coalition Protocol
- Education and Community Resource Guide