

**JAMES BAY LOWLANDS  
SECONDARY SCHOOL BOARD**

PROTOCOL	
Effective	January 26, 2022
Last Revised	

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**KEEPING STUDENTS SAFE: ANTI-SEX TRAFFICKING  
PROTOCOL**

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The James Bay Lowlands Secondary School Board is committed to promoting student safety by building a culture of caring and taking meaningful, culturally responsive and consistent action to prevent and respond to issues of student safety. We will work to protect students with specific attention and focus on vulnerable, at-risk and marginalized students by empowering school communities to play a key role in fighting sex trafficking and keeping children and youth safe from sexual exploitation.

**1.0 Application**

Sex trafficking is a form of sexual exploitation that 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. Most individuals who are trafficked for the purpose of sexual exploitation are women and girls, but any person may be targeted.

A number of diverse and intersecting factors result in students being vulnerable to violence and harm. This protocol outlines how to recognize and respond to situations where students are in danger.

**1.1 Raising Awareness and Preventing Sex Trafficking**

Physical and psychological safety is critical to nurturing positive student experiences. Schools are an important partner in raising awareness and responding to sex trafficking and supporting students, helping survivors heal and rebuild their lives, helping to prevent re-victimization and resetting students on a healing trajectory towards positive outcomes.

- a) Information will be posted on the board's website. It will include, at a minimum:
  - i. This protocol
  - ii. Resources on cyber-safety
  - iii. Signs of being targeted, lured, groomed, trafficked or is trafficking another student
  - iv. Information on how to seek help or report concerns
  - v. Culturally safe supports for vulnerable students and families including those who identify as Indigenous, Black, racialized, 2SLGBTQQA+ and newcomers
  - vi. How to file a report, including anonymous reports
  - vii. A plan for preventing the sex trafficking of students
  
- b) In addition to the content contained in the [Health and Physical Education](#) curriculum and the information on the website, educators and administrators will identify opportunities to raise

awareness among students and families on the signs of sex trafficking and create a safe environment for those who may be experiencing or aware of such activities to seek help or support. Some examples include sending letters or email, include information in student handbooks, posters, information sessions and social media activities.

- c) Technology will be used, such as internet filters, to monitor for online threats and notify administration of threats or students at risk of sex trafficking.

### 1.2 Response Procedures

The following processes are to be used by staff using a trauma-informed and culturally responsive approach. Any actions should consider unique individual needs of students, including, but not limited to special education, mental health, social/emotional, cultural and/or language needs. Staff supports, families and community resources may be engaged to ensure a safety/re-entry plan is developed to meet the individual needs of the student.

Students are encouraged to report any concerns of or involvement in sex trafficking to any staff member they trust. Anonymous complaints may be submitted to main office, **\*\*attention – school principal\*\***.

- a) When a student discloses or shares suspicion of sex trafficking:
- i. Listen without judgement and support the student's immediate physical and emotional safety. Making a disclosure is a vulnerable experience.
  - ii. Ensure the student remains supervised and is not re-victimized by having to repeat the story.
  - iii. Advise the student you are required to share information about illegal activities with the Police and Child Protection Agency. Where applicable, advise the principal and/or superintendent.
  - iv. Contact NLSS administration or the school's Student Success Team for guidance and to initiate culturally trauma-informed and culturally responsive supports and safety plan for the student(s).
  - v. File a report with a Child Protection Agency in accordance with the [Child, Youth and Family Services Act](#).
  - vi. Contact the student's parent(s)/guardian(s).
  - vii. Engage local Police, for advice or to file a report, in accordance with the Police/School Board Protocol.
  - viii. Develop a safety plan for the student in collaboration with relevant staff, the student, family members and community partners, as applicable. The safety plan should include, at a minimum; immediate interventions and trauma-informed and culturally responsive resources, supports and/or accommodations.
  - ix. Maintain confidentiality in accordance with relevant legislation and Board procedures.
  - x. Regularly monitor and check-in with the student as outlined in the safety plan.

- b) Responding to disclosure of a student who is thought to be targeting, luring, grooming or recruiting children and youth for the purpose of sex trafficking:
- i. Listen without judgement and support the student's immediate physical and emotional safety. Making a disclosure is a vulnerable experience.
  - ii. Identify and reach out to any other student(s) who may be involved and ensure they remain supervised. Ensure students are not re-victimized by having to repeat the story or be further targeted.
  - iii. Advise the student(s) you are required to share information about illegal activities with the Police and Child Protection Agency. Where applicable, advise the principal and/or superintendent.
  - iv. Contact the administrator at Northern Lights Secondary School for guidance and to initiate culturally trauma-informed and culturally responsive supports and safety plan for the student(s).
  - v. File a report with a Child Protection Agency in accordance with the [Child, Youth and Family Services Act](#).
  - vi. Contact the student's parent(s)/guardian(s).
  - vii. Engage local Police, for advice or to file a report, in accordance with the Police/School Board Protocol.
  - viii. Develop a safety plan for the student in collaboration with relevant staff, the student, family members and community partners, as applicable. The safety plan should include, at a minimum; immediate interventions and trauma-informed and culturally responsive resources, supports and/or accommodations.
  - ix. Maintain confidentiality in accordance with relevant legislation and Board procedures.
  - x. Regularly monitor and check-in with the student(s) as outlined in the safety plan(s).
- c) 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 reintegration 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 Board procedures.
  - iii. Regularly monitor and check-in with the student(s) as outlined in the safety/re-entry plan(s).
- d) 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.

- e) Supporting staff who may be impacted:

While maintaining confidentiality, ensure staff who may be indirectly impacted are aware of supports and services to support their personal mental health and wellbeing. This may include employee assistance programs, staff resources and/or community-based service providers.

Administration and the Student Success Team at Northern Lights Secondary School is available to provide advice and/or support in the application of this protocol.

**1.3 Confidentiality, Reporting and Record Keeping**

- a) All information related to incidents of sex trafficking must remain confidential and only disclosed to staff who are required to administer resources and/or supports to students.
- b) All incidents of sex trafficking must be reported under the Child, Youth and Family Services Act. Illegal activities must also be reported to the local police.
- c) Confidential records must be kept secure and maintained in accordance with the Board’s record keeping procedures. For advice, refer to Board Administrative Procedure AP-190 Record Retention or contact JBLSSB Finance and Human Resource Administrator.

**1.4 Training for school board employees**

Training will be provided as part of the Board’s annual compliance training, early in the school year for school-based staff, including teachers and administrators. This training will also be provided for any staff member who works directly with students or who support anti-sex trafficking initiatives.

- a) Training will include:
  - i. Key definitions, common misconceptions and myths about sex trafficking, including tactics used for online luring, grooming and recruitment
  - ii. Learning about human rights-based approaches to combatting sex trafficking, including the application of an equity lens, anti-racism, a gender-based lens, trauma-informed approaches and Indigenous cultural competencies
  - 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

Training will be updated, as required, to ensure it remains relevant. Completion of training will be tracked as part of the annual compliance training process. New employees who are required to engage in this training will complete it as part of the onboarding process.

### **1.5 Accountability and Evaluation**

Data will be collected, as required by the Ministry of Education, to monitor the effectiveness of training and whether the protocols respond to the needs of students. Community partners will be invited to participate in the reporting process to determine how the protocols have helped children and youth in care.

## **2.0 Resources**

- 2.1 [\*Policy/Program Memorandum 166, Keeping Students Safe: Policy Framework for School Board Anti-Sex Trafficking Protocols\*](#)
- 2.2 [\*Municipal Freedom of Information and Protection of Privacy Act\*](#)
- 2.3 [\*Ontario Human Rights Code\*](#)
- 2.4 [\*Accessibility for Ontarians with Disabilities Act\*](#)
- 2.5 [\*Education Act\*](#)
- 2.6 [\*Child, Youth and Family Services Act\*](#)
- 2.7 [\*Criminal Code of Canada\*](#)
- 2.8 [\*Policy/Program Memorandum 9: Duty to Report Children in Need of Protection\*](#)