



KAWARTHA PINE RIDGE DISTRICT SCHOOL BOARD

ADMINISTRATIVE REGULATION

Regulation Name: Anti-Sex Trafficking
Section: Educational Services

Regulation Code: ES-1.1.13
Policy Code Reference: ES-1.1

Established: September 19, 2022
Revised or
Reviewed: January 8, 2024

1. OBJECTIVE

This administrative regulation is written in accordance with the guiding principles in Board Policy ES-1.1, Safe and Caring Schools.

The Safe and Caring Schools Anti-Sex Trafficking Administrative Regulation supports the implementation of the Ministry of Education's Policy/Program Memorandum 166: Keep Students Safe: Policy Framework for School Board Anti-Sex Trafficking Protocols. This Administrative Regulation is aligned with the governing legislation, including but not limited to, the Education Act, the Human Rights Code, the Child, Youth, and Family Services Act, the Accessibility for Ontarians with Disabilities Act, the Municipal Freedom of Information and Protection of Privacy Act and the Protecting Students Act.

When referring to and using this Administrative Regulation and the Kawartha Pine Ridge District School Board's (KPR) Anti-Sex Trafficking Guide, a human-rights based approach is vital in empowering rights-holders and ensuring the critical role of duty-bearers in promoting and protecting human rights. Human rights are those rights which are inherent and are centered in valuing individual dignity and worth of everyone, regardless of social identity and/or where an individual may be situated in society. It comes with the expectation that we are all entitled to equal rights and opportunities in fostering a culture of accountability, non-discrimination, mutual respect, sovereignty and justice. For guidance on human rights at KPR, please contact the Commissioner's Office of Human Rights, Equity and Accessibility (COHREA).

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. This Administrative Regulation promotes student safety by building a culture of caring and by taking meaningful, culturally responsive, culturally competent and consistent action to prevent and respond to sex trafficking.

2. DEFINITIONS

Board

The corporate Board which maintains the daily operation of the system, Kawartha Pine Ridge District School Board, a reference specifically pertaining to Kawartha Pine Ridge

District School Board as a legal entity; also referred to as KPR or KPRDSB.

Sex Trafficking

A form of sexual exploitation that is a crime under the Criminal Code of Canada. It is defined by the use of force, physical or psychological coercion that is facilitated by a third party for the purposes of profiting from someone. It may include recruiting, harbouring, transporting, obtaining or providing a person for the purpose of sex.

Survivor

Used to refer to an individual who has escaped a trafficking situation. The term may also be used to refer to a person with lived experience of being trafficked.

Victim

Used to refer to an individual who is in the process of being recruited or is being trafficked. The term is often used to refer to a child/youth who has experienced sexual exploitation and sex trafficking.

These definitions provide clarity and are 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 experience. Further definitions can be found in the guide and definitions/terms will be updated on an ongoing basis to reflect current language and practices.

3. APPLICATION

This administrative regulation applies to all members of the Kawartha Pine Ridge District School Board community which includes all trustees, staff, contract personnel, students and volunteers, parents, guardians and caregivers, and community groups and agencies working with the Board.

4. RESPONSIBILITY

Responsibilities have been outlined in the procedures herein.

5. PROCEDURE

5.1 Statement of Principles

5.1.1 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 must be given when reaching out to parents, guardians and caregivers to ensure they are safe adults prior to engaging with them on matters regarding the student(s). Outreach to Indigenous parents, guardians and caregivers and communities, as well as outreach to Black, racialized and

2SLGBTQIA+ parents, guardians, and caregivers should be trauma-informed, anti-racist, anti-colonial, anti-misogynist and recognize historic and systemic barriers that may impact their participation. Administrators must ensure that cultural and/or linguistic barriers are bridged when reaching out to parents, guardians and caregivers and communities about this work. Principals also must ensure they contact the Indigenous Education Department and Equity, Diversity and Inclusive Education Department for guidance.

5.1.2 Fostering Student Voices

Students are at the centre of this work and should be involved in efforts to develop actions against sex trafficking. Gathering student voices must be completed in a culturally competent and trauma-informed approach. There should be a diverse array of student representation and ensuring that Indigenous, Black, racialized and 2SLGBTQIA+ voices are given priority, and it is important to give multiple opportunities and seek guidance on how to capture these voices. Seeking guidance and advice from the Indigenous Education Department and the Equity, Diversity and Inclusive Education Department are critical. These departments will support administrators to foster relationships between the school system and students facing barriers and systemic discrimination. These departments can also support administrators to connect students to trusted and caring adults and leadership programs at schools. KPR will seek input and feedback from youth with lived experience with the support of community groups and agencies.

When seeking the involvement of students with lived experience in raising awareness and prevention strategies, members from the following KPR departments/teams must be consulted to ensure trauma-informed approaches are utilized: Indigenous Education Department, Equity, Diversity and Inclusive Education Department, and Professional Services and Mental Health. Counselling support must be offered through the engagement period.

5.1.3 Building Multi-sectoral Relationships with Community Organizations

Ongoing consultation and engagement with community groups and agencies that support members of the school community are essential to supporting anti-sex trafficking approaches that are responsive to diverse students and the needs of local school communities. In the development of this Administrative Regulation and the accompanying guide, administration has consulted with the following community groups and agencies: Alderville First Nation, Curve Lake First Nation, Hiawatha First Nation, Métis Nation of Ontario (MNO) Peterborough & District Wapiti Métis Council (PDWMC), Anishnaabe Kwewag Gamig Regional

Women's Shelter, Dnaagdawenmag Binnoojiiyag Child & Family Services, Kawartha Sexual Assault Centre, Murray McKinnon Foundation and Lavender Hills Education and Community Partnership Program (ECPP: also known as Section 23 Programs), New Canadians Centre, Nijkiwendidaa Anishnaabekwewag Services Circle, Nogojiwanong Friendship Centre, Highland Shores Children's Aid Society, Peterborough Aids Resource Network (PARN), Victim Services Durham Region, Victim Services Peterborough Northumberland and Parent Involvement Committee representatives and the KPR Special Education Advisory Committee.

Draft documents have also been shared for feedback with Métis Nation of Ontario (MNO) Oshawa and Durham Region Métis Council, members of the KPR Canadian Union of Public Employees (CUPE) Local 5555, Elementary Teachers' Federation of Ontario (ETFO/OT), Ontario Principals' Council (OPC), Ontario Secondary School Teachers' Federation (OSSTF/OT), Community Race Relations Committee of Peterborough, Durham Children's Aid Society, Kawartha Haliburton Children's Aid Society, Parents, Families, and Friends of Lesbians and Gays (PFLAG) for Durham Region, Cobourg Northumberland and Peterborough, Peterborough Domestic Abuse Network (PDAN: coalition of community services in Peterborough County), Thrive Northumberland (coalition of community services in Northumberland County), the Violence Prevention Coordinating Council (VPCC) of Durham (coalition of community services in Durham Region), Peterborough Youth Services, Police Services for Cobourg, Durham Region, Port Hope and Peterborough, and Ontario Provincial Police for Brighton, Northumberland County and Peterborough County.

The above groups and agencies will continue to be a resource that KPR can connect with for guidance and support.

- 5.1.4 Interventions must be safe and provide a circle of care (KPR employees are to refer to the Anti-Sex Trafficking Guide for responses and protocol).

Trusted and 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 to immediately connect with the services that can provide support for early intervention through identification and culturally competent and trauma-informed responses, including connecting impacted persons to supportive services.

School board employees require comprehensive anti-sex trafficking training in order to ensure they are equipped to identify the signs of sex trafficking, safely respond to disclosures, be culturally competent and responsive to diverse student populations, and support the immediate

physical and emotional safety needs of students. Training must emphasize how to respond to immediate dangers and the need to avoid actions that will make an individual's situation worse or more unsafe (refer to KPR Anti-Sex Trafficking Guide and Administrative Regulation ES-1.1.4, Child in Need of Protection).

5.1.5 Build-up School-based Prevention

This Administrative Regulation will complement existing prevention efforts in schools, including the teaching of consent, healthy relationships and healthy sexuality, as well as KPR employee training and the Ontario College of Teachers mandatory Sexual Abuse Prevention Program for teachers. It is important for school staff to 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.

5.1.6 Respect Confidentiality, Privacy and Informed Consent

The development of procedures must respect confidentiality and ensure that 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 Data Standards for the Identifying and Monitoring of Systemic Racism; the Accessibility for Ontarians with Disabilities Act, 2005; the Municipal Freedom of Information and Protection of Privacy Act; the Child, Youth and Family Services Act, 2017; the Education Act; the Ontario Human Rights Code; and the Personal Health Information and Protection Act.

5.1.7 Promote Equitable and Culturally Competent Responses

Protocols should demonstrate a human rights-based, non-judgemental, culturally competent and responsive, survivor-centered and trauma-informed approach to raising awareness, preventing, identifying and responding to sex trafficking. The Indigenous Education Department and the Equity, Diversity and Inclusion Education Department shall be included and collaborated with on the creation of these protocols.

5.2 Strategies to Raise Awareness and Prevent Sex Trafficking

This Administrative Regulation and resources will be publicly available on the KPR website so that it is accessible to parents, guardians, caregivers, students, staff and communities.

The strategies outlined in this Administrative Regulation will apply to all learning environments, including in-person learning as well as remote learning. The strategies will also apply to all school and school board activities, including field trips, overnight excursions, board-sponsored events and board-operated before- and after-school programs.

In partnership with community-based groups and agencies, school board staff will provide culturally competent and responsive strategies to raise awareness about sex trafficking with students, staff, parents, guardians, caregivers and the broader school community. Strategies will focus on:

- cyber-safety;
- the signs that a student is being targeted, lured, groomed, trafficked or is trafficking another student;
- how to get help safely (e.g., through the school board, community partners and/or hotline);
- how to report concerns to the school board (including anonymous reporting) and the school board's process for responding to concerns; and
- approaches to overcome barriers to participation that Indigenous, Black, racialized, 2SLGBTQIA+, students with disabilities, newcomer and other students and parents/guardians and caregivers may face.

There is ample research to show that the intersectionality of many factors is usually at play rather than a single factor.

Additionally, and to help prevent recruitment of students for sex trafficking, school board staff will continue to support curriculum-based learning opportunities about healthy relationships, boundaries, consent, mental health and wellbeing, coping skills, personal safety and online safety. Partnerships with community-based groups and agencies will support KPR with developing its prevention strategies and supports.

5.3 Responsibilities and Response Procedures

5.3.1 Superintendents

Superintendents shall:

- 5.3.1.1 ensure that opportunities and resources are available for board staff to acquire awareness, knowledge, skills, attitudes and supports necessary to address 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 sex trafficking, and sexual exploitation; and
 - is returning to school after they have been trafficked or involved in trafficking others.
- 5.3.1.2 provide human-rights based, culturally competent and responsive, trauma-informed and safe strategies and opportunities to raise awareness about sex trafficking with students, staff, parents, guardians and caregivers and the broader school community including:
- cyber-safety;
 - the signs that a student is being targeted, lured, groomed, trafficked, or is trafficking another student;
 - how to get help safely (for example, through the school, board, community providers and/or support hotline);
 - how they can report concerns to the school and board (including anonymous reporting) and the school board's process for responding to concerns;
 - a process that will actively seek to engage all parents, guardians, and caregivers through outreach to include groups disproportionately impacted including approaches to overcoming historic and systemic barriers to participation that Indigenous, Black, racialized, 2SLGBTQIA+ and newcomer students and other parents/guardians and caregivers may face; and
 - safety plan development with schools.
- 5.3.1.3 support principals with the implementation of this guide.
- 5.3.1.4 ensure culturally competent and responsive services and supports are available through a range of community-based partners, including organizations/agencies such as Indigenous-led, Black and other racialized groups and 2SLGBTQIA+ organizations, and are offered to students and staff who are affected by suspicions and disclosures of sex trafficking.

5.3.2 Principals

Principals shall:

- 5.3.2.1 ensure all staff are trained in being able to detect the signs that a student is being targeted, lured, groomed, trafficked, or is trafficking another student and how to get help safely;

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- 5.3.2.2 ensure school councils have access to materials and information vetted by the tri-department group of Indigenous Education, Equity, Diversity and Inclusive Education and Safe, Caring and Restorative Schools;
 - 5.3.2.3 foster student voices and raise awareness among students on the signs a student is being targeted, lured, groomed, trafficked, or is trafficking another student, and how to bring concerns about luring, grooming, recruitment or exiting sex trafficking to the school without fear of reprisal with a process that allows concerns to be brought forward anonymously;
 - 5.3.2.4 help prevent recruitment of students for sex trafficking, including through culturally competent and responsive curriculum-based learning about healthy relationships, consent, mental health and wellbeing, coping skills, personal safety, and online safety, as well as through work with local community-based organizations and survivors;
 - 5.3.2.5 raise awareness on the use of technology and tools to identify and deter potential situations involving students who could be at risk of sex trafficking and other online threats, while using school board-provided technology;
 - 5.3.2.6 respond to all incidents of suspicions or disclosures of sex trafficking in accordance with this guide;
 - 5.3.2.7 respond to and meet the needs of students who are victims and survivors of sex trafficking including access to education, facilitating school re-entry, and monitoring those students affected with check-ins;
 - 5.3.2.8 ensure a safety plan is developed and determine who it will be shared with;
 - 5.3.2.9 respond to, and meet the needs of, students who are being trafficked and who may be involved in the recruiting of other victims, including students who are returning to school after they have been involved in a trafficking situation; and
 - 5.3.2.10 complete the school/system tracking form.

5.3.3 Staff

All staff shall:

5.3.3.1 respond to and report all incidents of suspicions or disclosures of sex trafficking to the principal in accordance with this regulation and the Anti-Sex Trafficking Response Guide. This applies to a student who:

- may be at risk of, or is being sex trafficked;
- may be targeting, luring, grooming or recruiting children and youth for the purpose of sex trafficking; and/or
- is returning to school after they have been trafficked or involved in trafficking others.

5.3.3.2 use teaching and learning practices to help prevent recruitment of students for sex trafficking, including through culturally competent and responsive curriculum-based learning about healthy relationships, consent, mental health and wellbeing, coping skills, personal safety, and online safety, as well as through work with local community-based organizations and survivors.

5.3.4 Students

Students shall:

5.3.4.1 work in partnership with school staff and parents, guardians and caregivers to maintain safe learning environments; and

5.3.4.2 report all incidents of suspicions or disclosures of sex trafficking to a trusted, caring adult.

5.3.5 Parents, Guardians and Caregivers

Parents, guardians and caregivers shall collaborate with the school in order to support their child with the necessary wraparound supports required when a suspicion or disclosure occurs.

5.3.6 Community Groups and Agencies

Community groups and agencies will:

5.3.6.1 work with staff in supporting schools, students, and families with strategies to raise awareness and prevent sex trafficking; and

5.3.6.2 work with staff in supporting schools, students, and families when 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 sex trafficking; and
- is returning to school after they have been trafficked or involved in trafficking others.

5.4 Training for School Board Employees

New and existing school board staff must engage in anti-sex trafficking training. Staff training will take a trauma-informed, tiered approach, with awareness level training being offered to all Board employees and more in-depth training being provided to those who work in, or directly in support of, schools. All training will be developed in collaboration with community groups and agencies who have expertise in providing training on sex trafficking prevention and intervention. Training will be updated and delivered regularly to stay current with emerging issues relating to trafficking and changes in community services and responses.

Training must include the following elements:

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

- safety planning with staff and students for self-safety and with students when they are not at school.

5.5 Measuring Success: Accountability and Evaluation

In collaboration with the Ministry of Education and community groups and agencies, KPR will develop a performance measurement framework. This framework will monitor the effectiveness of training and whether this Administrative Regulation and Anti-Sex Trafficking Guide respond to the needs of students. This will be measured with performance indicators on how the provisions in place are preventing trafficking within school communities.

6. RELATED POLICIES, ADMINISTRATIVE REGULATIONS OR PROCEDURAL DOCUMENTS

Board Policies:

[B-3.2, Equity, Diversity and Inclusion](#)
[ES-1.1, Safe and Caring Schools](#)

Administrative Regulations:

[ES-1.1.4, Child in Need of Protection](#)

Procedural Documents (internal):

[Anti-Sex Trafficking Guide](#)

7. REFERENCE DOCUMENTS

Legislation:

[Accessibility for Ontarians with Disabilities Act](#)
[Child, Youth and Family Services Act](#)
[Education Act](#)
[Human Rights Code](#)
[Municipal Freedom of Information and Protection of Privacy Act](#)
[Personal Health Information and Protection Act](#)
[Protecting Students Act](#)

Other Documents:

[Data Standards for the Identification and Monitoring of Systemic Racism](#)
[Ministry of Education, Policy and Program Memorandum 166: Keep Students Safe: Policy Framework for School Board Anti-Sex Trafficking Protocols](#)