



**ONTARIO PUBLIC  
SCHOOL BOARDS'  
ASSOCIATION**

**Leading Education's Advocates**

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**OPSBA Response to the Ministry of Education Questionnaire:  
*Helping to Combat Sex Trafficking of Elementary and Secondary  
Students in Ontario***

The Ontario Public School Boards' Association (OPSBA) has been following the legislative process for Bill 251, *Combating Human Trafficking Act, 2021* since it was first introduced by Solicitor General Sylvia Jones on February 22, 2021. That day was Human Trafficking Awareness Day in Ontario and our Association also shared this via social media and with our members. Although there are no direct changes to the *Education Act*, we are supportive of any amendments that will increase awareness of the issue of human/sex trafficking and those that add further protection to children and youth.

One of OPSBA's multi-year priorities is Advocating for the Whole Child and Student Well-Being and we believe that improving student achievement and student engagement is directly linked to ensuring that we work collaboratively to support the social, emotional, mental and physical well-being of all children and youth in our increasingly complex world. We were pleased to be asked to respond to the Ministry of Education's questionnaire and recently convened a meeting with our Policy Development Work Team (PDWT) members. This consultative group includes trustees from across the province as well as representation from our Indigenous Trustees' Council and student trustees from the Public Board Council of OSTA-AECO. Our responses to the questionnaire can be found at the end of this letter.

OPSBA supports a provincial strategy that aims to increase awareness about human trafficking and the dangers that it poses to young people, their families and communities. We recognize that human trafficking can happen in any community and anyone can be a victim, however it is important to note that young women and girls are most often targeted. We are also aware that the average victim is 13 years old – an elementary school student.

We agree with research that states that human trafficking tends to target vulnerable populations and individuals facing barriers, people who identify as 2SLGBTQQIA+, people with mental illness or addiction, newcomers, migrant workers, people who struggle with poverty and homelessness, racialized individuals and children and youth who have been involved in the youth justice or child welfare systems. This includes Indigenous people, particularly Indigenous women and girls, who are especially vulnerable to being targeted for sex trafficking.

Our trustees discussed what is currently in place within the education sector and it appears that there is a wide variance in policies and practices. Very few school boards have policies that explicitly address human/sex trafficking. However, there are many that indirectly provide resources and support through staff covering Safe Schools, Mental Health and Well-Being, and Equity and

Inclusivity. In addition, some boards offer training modules on this topic for their board staff, teachers and education workers. Many students have had the benefit of guest speakers who are survivors and this is incredibly impactful. Other presentations have been conducted by local police divisions. We are unaware of any board specifically tracking this type of information.

It is true that the elementary Health and Physical Education (HPE) Curriculum was recently updated to include learning about online safety and consent, but these references are not mandatory and are included in “suggested topics” in the Grade 7 and 8 HPE Curriculum\*. We recommend that the ministry consider revising this to make it a mandatory part of the curriculum and to introduce the topic earlier. We also suggest the ministry consider adding this topic to the Language Arts curriculum between Grades 4 and 8. Building on this review, it is strongly felt that more focus needs to be on definitions and examples of healthy relationships. School boards and staff would need to have resources and professional development crafted by experts.

Trustees and school board staff also distinguished the differences and definitions needed to describe all aspects of human trafficking including those individuals being held and used against their will and those relationships that often appear to be “boyfriend-girlfriend” in nature to the victim and families.

With regard to current responsibilities, under the *Child, Youth and Family Services Act*, every person who performs professional or official duties with respect to a child, has a duty to report a child who is or who may need protection. (This is mandatory for children under the age of 16). All suspicions of child abuse or neglect must be reported directly to a Children’s Aid Society (CAS). A CAS has the exclusive mandate, under the *Child and Family Services Act*, to investigate allegations of child abuse or neglect and to deliver child protection services.

Trustees were looking for more details about the role of CAS and what happens after a report is filed. A suggestion would be to include more about human/sex trafficking in any support materials for the Duty to Report and an overview of the steps involved in an investigation.

The PDWT members agreed that school boards and schools are well-positioned to help and have a role in this issue as many victims were once students in our system. Children and youth need caring adults. In the school system this includes a range of individuals who may interact with students (teachers, education workers, principals, bus drivers, guidance councillors, social workers, Child and Youth Workers, Psychologists, Mental Health Workers and more.)

Cyberbullying was also seen as a significant issue. Any strategy must include how to build community awareness for parents and caregivers about the inappropriate use of the internet and social media. There is a huge need for digital literacy and critical thinking for many different audiences. A current example of luring and grooming was shared about white supremacy groups using gaming chat functions to reach young boys.

Outside of school, children and youth need community outlets that are safe and accessible. Many people do not understand that this actually happens in their local communities and so broad awareness and coordinated community action is needed. Trustees indicated that there are schools and communities that are located along major routes (such as the Trans-Canada Highway and Highway 401) and also near the international border with the United States where trafficking could be more likely to occur.

*\*The term “trafficking” is referenced twice under Strand D Healthy Living (page 252 and page 288) and again in the Glossary (page 313)*

It is important to note that school boards and schools are just one piece of the support network. Partnerships need to be created and maintained with community resources that also include local police. The support for a victim also needs to include more than one individual or group – a collaborative network is needed to sensitively navigate.

Finally, it was felt that part of what is missing from a proposed provincial strategy was a focus on offenders and how we can, as a society, stop the disrespect and harassment of women and girls. How can we help support boys and young men not to become future “customers”? Human and sex trafficking is a manifestation of a broader social issue that does not fully support women.

In terms of next steps, we would request that the Ministry of Education share any draft PPM with education stakeholders for review and input. OPSBA would support a PPM for all school boards to ensure consistency of messaging and resources, with the allowance for local school community partnerships. We do suggest and recommend that the ministry also connect with OPHEA and their current resources.

The ministry should also consider working with other ministries to develop a cohesive support network for the province’s overall Anti-Human Trafficking Strategy, including the Ministries of Health, Children and Youth, and Tourism, Culture and Sport.

Thank you for this opportunity,

A handwritten signature in black ink that reads "Cathy Abraham". The signature is written in a cursive, flowing style.

Cathy Abraham  
President  
Ontario Public School Boards' Association

*The Ontario Public School Boards' Association represents English public district school boards and public school authorities across Ontario, which together serve more than 1.3 million public elementary and secondary students. The Association advocates on behalf of the best interests and needs of the public school system in Ontario. OPSBA is seen as the credible voice of public education in Ontario and is routinely called on by the provincial government for input and advice on legislation and the impact of government policy directions.*

## Ministry of Education Questionnaire

### ***Q1 With respect to each of the following items, what role(s) do you think schools/school boards could play in effectively combatting sex trafficking?***

OPSBA and its member boards support a Ministry of Education policy framework that raises awareness of the issue; protects victims and intervenes early; supports survivors; and holds offenders accountable. Schools and boards could play an active role in all of these areas with the proper supports.

### ***Q2 What could schools/school board staff be doing to help protect students from online grooming and luring for sex trafficking?***

Please see our comments above about how to create more digital literacy awareness. In addition, school boards need to have sufficient funding allowing for the building of Information Technology infrastructure that will help improve the safety of students while they are accessing board-provided internet service and devices. This could include firewalls, and other technical support. Parent workshops could also be offered on a regular basis to provide updates on current and latest platforms.

### ***Q3 What steps could schools take to ensure that their approach to help combat sex trafficking and support victims and survivors is culturally safe, as well as respectful of and culturally responsive to the needs of the following groups?***

Since each school board and school is unique, a one-size-fits-all approach would not work. Schools know their local communities and students best and would have the appropriate method to reach these different audiences and their leaders, and bring them into the conversation early. This would include the communities they serve, Indigenous students, Black students, and racialized students; and 2SLGBTQIA+ students.

### ***Q4 What role should the following partners play in the development and implementation of school board policies to help combat sex trafficking of students?***

Individual school boards know what partners currently exist and which ones they need to connect with based on their school populations and communities. However, key stakeholders include: students, parents, guardians and caregivers, teachers and education workers, principals and vice principals, and senior board staff who have student well-being in their portfolio. Survivors and those with lived experiences offer powerful first-person accounts that can impact profoundly and are often seen to be the most credible.

Organizations should also look to partner with traditional/legacy media organizations in educating the public regarding human trafficking issues.

### ***Q5 Are you aware of any useful resources or tools that could support members of the school community (students, parents, school board staff/) with anti-sex trafficking efforts, including awareness-raising, prevention/protecting students, identification/early intervention, and/or response?***

OPSBA asked trustees and school board staff to share examples. These include:

- [Kids Help Phone](#)

- [Canadian Human Trafficking Hotline](#)
- [Canadian Centre to End Human Trafficking](#)
- [Stepstones for Youth Resources](#)
- [Joy Smith Foundation Educational programs for schools](#)
- <https://ccrweb.ca/en/trafficking-resources>
- [360Hope](#)
- [Helping Trafficked Persons](#)
- [Human Trafficking: Canada Is Not Immune Online Training](#)  
\*March 18 Webinar:  
[Colonization Impact on Increased Indigenous Presence in Human Trafficking](#)
- [EPACT presentations by Crime Stoppers](#)
- [CommonSense.org](#)
- [Media Smarts](#)
- [Protect Children](#)

***Q6 What best or promising practices may be applicable to schools in their approach to help combat sex trafficking of students for awareness, prevention/protection; identification/early intervention; response/supporting survivors?***

It was suggested that this topic be tied to research-based bullying prevention/relationship management work with students. Supporting students around bullying really means focusing on strategies and healthy relationships.

OPPSBA suggests that a well-promoted awareness campaign directed at students would be beneficial. If students feel supported and safe at school and have a trusted adult that believes in them, they are less likely to be trafficked.

Any strategy would need to include:

- Changing the culture of “it doesn’t happen here”
- Eliminating the stigma of talking about it at school by educating administrators, coaches and teachers
- Actively partnering in community-wide strategies to raise awareness
- Partnering with local police to create strategy, communications and engagement with students, as they may have the knowledge of who these students are and how they are being lured and groomed
- Creating and launching an educational component/module around human trafficking for all school staff to watch each year
- Creating and launching a curriculum focusing on Human Trafficking for all students in Grades 7 and 8 (or earlier)
- Creating and launching a secondary school curriculum focused on continuing the conversation and reinforcing components

- Ensuring resources (e.g. dedicated staff) are dedicated to particularly vulnerable groups (Indigenous, 2SLGBTQQIA+, racialized students)

***Q7 If you have any additional comments or feedback, please provide it below.***

OPSBA requests to be included in any draft PPM review. Suggested PPM requirements include:

- Purpose/Context
- Definitions – human trafficking, emotional abuse, etc.
- School Board policy components – clear school board/school expectations
- Training and Professional Development opportunities
- Provincial Resources (i.e. OPHEA, Children’s Aid Society)
- Monitoring and Evaluation – are school boards/schools to track and collect data?
- Implementation
- Conclusion