

Ministry of Education  
Policy/Program Memorandum 166: Keeping Students Safe:  
Framework for School Board Protocols to Combat Sex Trafficking

Frequently Asked Questions

**Q1. Why has the Ministry of Education developed an Anti-Sex Trafficking Policy/Program Memorandum?**

- A1.** Schools can play an integral role in combatting human trafficking, including the sexual exploitation of children and youth, when equipped with the appropriate tools and necessary skills.

Teachers and other education staff interact with students daily. They are strategically placed to educate on prevention and promote healthy relationships, notice troubling changes in behaviour, and connect with students as caring adults.

Schools are ideally positioned to facilitate early intervention and link students and survivors with culturally responsive resources and supports. At the same time, education can also serve as a key factor in helping survivors of trafficking heal and rebuild their lives, helping to prevent re-victimization and resetting students on a healing trajectory towards positive outcomes.

The Ministry of Education has developed the Anti-Sex Trafficking Policy/Program Memorandum (PPM 166) to provide a policy foundation for Ontario school boards to create regionally tailored anti-sex trafficking protocols across the province. School boards will collaborate with their community police services, local children welfare agencies, Indigenous communities and organizations, community organization and service providers serving survivors, children, youth and their family, to develop the protocols.

**Application**

**Q2. Which entities are subject to the Ministry of Education's Anti-Sex Trafficking Policy/Program Memorandum apply?**

- A2.** PPM 166 applies to district school boards, school authorities, and provincial and demonstration schools, including those operated by Centre Jules-Léger Consortium.

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**Q3. Does the Policy/Program Memorandum apply to private schools, including First Nation-operated and federally operated schools?**

A3. Private schools and First Nation-operated and federally-operated schools are not required to follow PPM 166.

However, the Ministry of Education is committed to supporting anti-sex trafficking efforts in private schools, including First Nation-operated and federally-operated schools, by sharing anti-sex trafficking resources and tools. While the policy/program memorandum is not mandatory for private schools or First Nation-operated and federally operated schools, the Ministry of Education will be providing support to these schools by disseminating the policy/program memorandum and related resources. In addition, the ministry will share information and answer questions related to PPM 166 upon request.

**Q4. Who has the ministry engaged with to develop the Anti-Sex Trafficking Policy/Program Memorandum?**

A4. The ministry:

- Solicited feedback through an online questionnaire sent to organizations with anti-sex trafficking expertise, and from the education, child protection and policing sectors, as well as Indigenous communities and organizations, and community organizations, including Black-led, parent-led and student-led organizations.
- Engaged with the Ministry of Education's Anti-Human Trafficking Working Group which include members with expertise in education, child welfare, human trafficking, and policing. The Working Group included persons with lived experience, organizations and individuals who amplified the voices and shared the knowledge of survivors, Indigenous communities and organizations, Black and racialized communities, newcomers, and students.
- Engaged with persons with lived experience via the Provincial Survivors/Lived Experience of Human Trafficking Roundtable and attended various stakeholder meetings to solicit feedback on key considerations for the development and implementation of the policy.

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**Q5. Did the ministry engage with the education associations, federations and unions?**

A5. Yes. The online questionnaire was sent to education sector associations, federations and unions to seek their feedback on key considerations for the development and implementation of the policy.

**Implementation**

**Q6. How does Policy/Program Memorandum 166 align with the duty to report?**

A6. If there are concerns that a student may be in need of protection, school board employees must meet their obligations under the *Child, Youth and Family Services Act, 2017* and Policy/Program Memorandum 9: Duty to Report Children in Need of Protection, inclusive of situations where a child is at risk of, is being or has been sexually abused or sexually exploited.

Moving forward, on June 1<sup>st</sup> 2021, the government passed new legislation ([Combating Human Trafficking Act, 2021](#)) that amended the *Child, Youth and Family Services Act, 2017* to more explicitly add child sex trafficking to the circumstances when a person has a duty to report a child who may be in need of protection to a children's aid society. These legislative amendments are anticipated to come into force in the Fall of 2021.

**Q7. What are the core components of the Ministry of Education's Anti-Sex Trafficking Policy/Program Memorandum?**

A7. The first of its kind in Canada, Ontario's Anti-Sex Trafficking Policy/Program Memorandum will **require** school boards to develop local protocols. The policy was developed with an equity focus and with a trauma-informed lens.

Local school board anti-sex trafficking protocols must include:

- Statements of principles
- Strategies to raise awareness and increase understanding about the urgency and complexity of combating sex trafficking
- An emphasis on the importance of multi-sectoral partnership
- Direction on response and support procedures for students who are at risk of or are being sexually abused/exploited/trafficked or who might be forced/coerced into the recruiting of other victims, as well as for students re-entering school after exiting a trafficking situation.
- Expectations for training for school board employees

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- Approaches to support accountability and evaluation

**Q8. What is the effective date of the ministry's Anti-Sex Trafficking Policy/Program Memorandum and what are the ministry's expectations leading up to this date?**

A8. In their discussions, the ministry's anti-sex trafficking working group emphasized that school boards would need time to build multi-sectoral partnerships and develop the protocol.

In response to this feedback, the effective date of the Anti-Sex Trafficking Policy/Program Memorandum is January 31, 2022. School boards will develop the school board anti-sex trafficking protocols for that date, with multi-sectoral partnerships to support development, implementation and review.

In the 2021-22 school year, school boards will also be dedicating a mandatory half-day Professional Activity (PA) day to learning about sex trafficking and bullying, including cyber-bullying.

**Q9. What kind of training must school boards provide and to whom?**

A9. As per PPM 166, anti-sex trafficking training must be provided to all school board employees, including teachers, administrators, educational assistants, caretakers, graduation coaches, and other school board staff. A phased approach is reasonable. Please see PPM 166 for the full list of elements to be included in the training.

Training must be updated and delivered regularly, to stay current with emerging issues relating to trafficking and changes in community services and response.

The training must be tracked and be available throughout the year to all new and existing school board employees.

**Q.10 What can school boards do to mitigate risks associated with student technology use?**

A10. Technology and the internet are increasingly playing a role in the practices and processes that enable sex trafficking. With students spending more unsupervised time online, especially during this COVID-19 pandemic, online social media platforms, applications and other online tools are increasingly being used by

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traffickers and other sexual predators to lure, groom and recruit young for the purposes of sexual exploitation, including sex trafficking.

**Q11. How does Policy/Program Memorandum 166 align with the Provincial Model for a Local Police/School Board Protocol?**

A11. School boards are already required to develop partnership protocols with local police services. Depending on the complexity of effort, some school boards may seek to include response to sex-trafficking into existing police-school board protocols. Including the response to sex trafficking within these protocols will require careful planning due to the complexity of this issue. Some boards have developed a regional local police-school board protocol involving multiple school boards and multiple police services in order to facilitate information-sharing and response.

**Q12. How will the school board anti-sex trafficking protocols align with the Community Safety and Wellbeing Plans?**

A12. When developing anti-sex trafficking protocols, school boards may wish to consider aligning with and leveraging local Community Safety and Well-being (CSWB) planning efforts, such as community consultations, planning advisory committees or action teams, as well as anti-human trafficking strategies or programs that may have been identified and/or implemented through a CSWB plan.

CSWB planning involves municipalities working across a wide range of sectors, agencies and organizations to proactively develop and implement evidence-based strategies and programs to address local priorities (i.e., risk factors, needs of equity and priority populations, protective factors) related to crime and complex social issues on a sustainable basis. Municipalities have local discretion to identify and address the risks that are most prevalent in their communities as part of their CSWB plans.

As part of the planning process, municipalities are required to establish an advisory committee inclusive of, but not limited to, representation from:

- the local police service/board,
- the Local Health Integration Networks or health/mental health services,
- educational services,
- community/social services,
- community services to children/youth, and
- custodial services to children/youth.

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Consideration must also be given to the diversity of the population in the municipality to ensure the advisory committee is reflective of the community.

Under the Police Services Act, municipalities have until July 1, 2021, to develop and adopt their first CSWB plan.

**Q13. How is the prevention of sex trafficking addressed in the curriculum?**

A13. The 2019 elementary Health and Physical Education curriculum helps students learn skills to identify, develop and maintain healthy relationships, to identify and respond to exploitive and coercive behaviour, and how to seek help as needed. These skills help protect against human/sex trafficking. The Grades 1-8 Health and Physical Education (2019) curriculum is designed to be developmentally appropriate and students develop and build these skills in every grade.

- In Grades 1-3, students begin to learn skills to identify, develop and maintain healthy relationships, to identify and respond to physically and mentally harmful behaviours, including exploitive behaviours, and how to seek help as needed.
- In Grades 4-8, students continue to develop the skills they need to stay safe (in person and online), and how to help themselves and others.
- Learning about sex trafficking is explicitly included in the examples and sample teacher prompt/student responses of learning expectations in Grades 7 and 8.

**Support for the Education Sector**

**Q14. Will the ministry provide school boards with funding for the development and implementation of the Policy/Program Memorandum?**

A14. Yes. An investment of \$2.4M is being made to support the new Anti-Sex Trafficking Policy/Program Memorandum. The ministry will provide funding directly to school boards to facilitate the development of protocols as well as to support implementation, including training for all school board employees in order to learn about the signs of sex trafficking, prevention-focused measures, response procedures, and supports. Ministry-funded implementation resources and tools (including training) will also be developed and made available.

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**Q15. How is the Ministry of Education supporting parents and guardians through this new Anti-Sex Trafficking Policy/Program Memorandum?**

A15. The ministry is committed to supporting parents and guardians as part of a whole school approach to overcoming sex trafficking. As part of this commitment, parent and guardian-focused resources will be released in the 2021-22 school year.