

16 October, 2025

RE: REQUIREMENT FOR THE ESTABLISHMENT OF A POLICY UNDER BILL 19 – SAFE SCHOOLS

Attention Superintendent,

In 2022, MSBA provided a template document for you to work with, to communicate materials on **Staff-Pupil Interactions, as well as Human Trafficking and Child Sexual Exploitation** to all Staff. It included a cover letter and 2 separate reference guides. On the following pages you will find a new template for a letter to “All Staff” on these topics, with revised and updated reference documents. A new and important section on how to respond to any **Intimate Images** that may be received on divisionally-owned electronic devices, is also featured among these documents.

On 25 June 2025 you received MSBA's update on Bills from the First Session of the 43rd Legislature (Spring Update). Contained within that communication was an update on Bill 19 – *The Public Schools Amendment Act (Safe Schools)*. [Memo to BC SU ST re Spring 2025 Legislative Bill Update.pdf](#)

As a result of the changes made to the Act under Bill 19, Divisions are now required to establish a policy about appropriate and inappropriate interactions between students and staff. There are a small number of Divisions that have already established a policy. Those who have not done so will now need to do so. All Divisions, including those who already have a policy in place, will need to ensure that staff are aware of the policy and provide information about the policy to students, parents/guardians/responsible adults and to the public.

On the next page you will find a letter template that can be used to accompany the policy that your Division establishes when sending it to all staff. You will also need to decide how to communicate this policy to students, parents/guardians/responsible adults and the public as required by Bill 19.

On the remaining pages you will find a similar guide to what was provided in 2022 as “strongly recommended best practices to guide interactions between all staff and pupils”. This document can be used to guide the content of the policy now required under Bill 19.

Bill 19 reinforces the importance of these issues by requiring every School Board to establish a policy on Staff-Student interactions, including procedures for reporting and addressing violations, and requiring each School Board to ensure that staff, coaches and volunteers complete sexual abuse prevention and school sport abuse prevention programs at minimum once every four years.

Should you have any questions please reach out to MSBA Executive Director Josh Watt at jwatt@mbschoolboards.ca or MSBA Senior Director, Labour Relations and Human Resources Services, Morgan Whiteway at mwhiteway@mbschoolboards.ca.



Alan M. Campbell
President

TEMPLATE LETTER

(FOR DIVISIONAL / SCHOOL LETTERHEAD AND SIGNATURE BY HIGHEST SIGNING OFFICER)

Dear staff,

Welcome back to school! We hope that the 2025/26 school year provides you with renewed focus, new vision and the opportunity to pursue and fulfil your professional and life goals.

In preparation for the year ahead and also for the future, a new policy has been produced for your review and reflection.

Bill 19, which received Royal Assent on June 3, 2025 now requires every school board to:

- establish a policy about appropriate and inappropriate interactions between students and staff on and off school sites that includes procedures for reporting and addressing violations; and
- provide information about the policy to students, parents and the public.

In addition, the school board must ensure that school staff, coaches and volunteers complete sexual abuse prevention and school sport abuse prevention programs at minimum once every four years.

Please find attached a Policy entitled _____. All staff must review the policy and ensure that these practices are integrated into their daily practice.

The topics covered by this Policy are integral. By working collaboratively, we can promote safe schools for all of our students, while promoting your best interests as our staff and colleagues.

Thank you in advance for investing your time in review of this very important Policy.

Sincerely,

[insert name and title here]

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HUMAN TRAFFICKING, CHILD EXPLOITATION, AND NON-CONSENSUAL INTIMATE IMAGES IN MANITOBA SCHOOLS

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STAFF INTERACTIONS WITH STUDENTS

REFERENCE DOCUMENT



INTRODUCTION

In the 2022/23 school year, all school staff completed the *Respect in Schools* and/or the *Commit2Kids* professional development programs (which of these two programs is supported by your own local school or school division will be communicated to you by them).¹



Staff providing supervision or coaching of intramural or extra-curricular school athletics programs will further complete the *Respect in Sport* program.¹ These programs provide valuable information to help all staff become more aware of circumstances within our school communities that challenge positive interactions, or where pupils may require special support or assistance by staff.



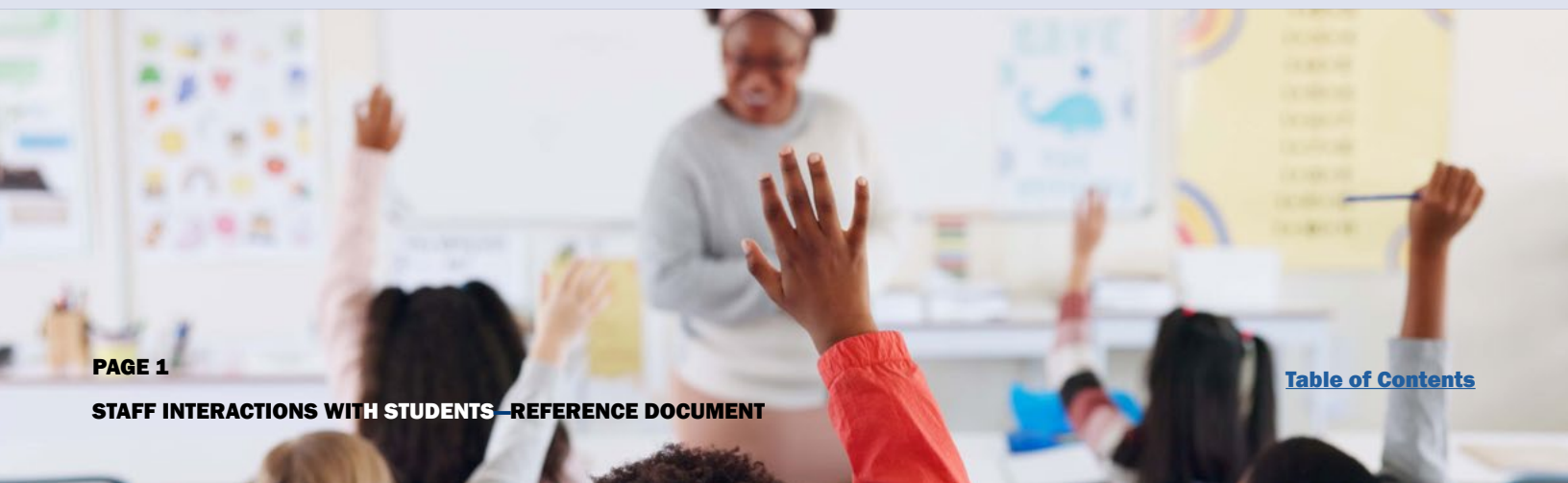
Please note that Bill 19, *The Public Schools Amendment Act (Safe Schools)*, which was passed in spring, 2025, now also requires that school staff, coaches and volunteers to complete sexual abuse prevention and school sport abuse prevention programs at minimum once every four years. *The Education Administration Act* was also amended to give the Minister of Education the power to approve the abuse prevention programs. Divisions must ensure that the programs in place in your Division continue to meet with the approval of the Minister. As of September, 2025, *Respect in School/Sport* and *Commit2Kids* remain approved by the Minister for this purpose.

To help support the mandatory establishment of a policy, this information, originally compiled in 2022 by the Manitoba School Boards Association and Manitoba Schools Insurance, has been included here for your reference when developing your policy. Also, please reference the policies already developed by your school division or the divisions where you are employed or volunteer.

The overarching purpose of these materials is to ensure that staff are made aware of how they can protect themselves and their students, while helping schools and school divisions to recognize many forms of staff-student interactions that deserve special consideration. Staff includes everyone within a school who directly works or interacts with pupils (please see “definitions” below).

By distributing this policy to all staff and by focusing efforts to raise awareness and providing further professional development for staff on these topics, we can all make a significant difference. We can further build upon the supportive and positive learning environments that schools ought to be – for both staff and students.

¹Respect in Schools / Respect à l'école— English: <https://www.respectgroupinc.com/respect-in-school/> Français: <https://french.respectgroupinc.com/respect-a-lecole/> ; Respect in Sport / Respect et Sport English: <https://www.respectgroupinc.com/respect-in-sport/> Français: <https://french.respectgroupinc.com/respect-et-sport/>; Commit 2 Kids / Priorité Jeunesse— English: <https://commit2kids.ca/en/> Français: <https://commit2kids.ca/fr/>





boundaries is defined as professional behaviour by staff members while and when interacting with / communicating with pupils. See “behaviours” section in the content that follows, for further clarification and definition of acceptable boundaries.

intention/intentional/intentionally means any act or outcome undertaken with express advance planning and/or purpose by a staff member.

parent/guardian/responsible adult means any person who exercises parental duties and obligations over a pupil by virtue of biological, adoptive, customary, temporary ward or custody, host family arrangement, or through other legally defined responsibility.

property/properties means any physical, electronic, stationary, moveable or vehicular properties.

pupil means any person attending or participating in school instruction or activities inside or outside of Manitoba, subject to exceptions as laid out in the content that follows.

staff or staff member(s) includes all school or school division employees including administration, teaching and non-teaching staff, as well as coaches, volunteers, teacher candidates and practica candidates. Where a school board member or trustee may also interact with pupils without supervision, this definition would equally apply.

BOUNDARIES

As with any relationship, boundaries are important guideposts for defining what should and should not be done, what is acceptable or not acceptable, and what promotes the best interests of all people who are in that relationship.

In the context of staff-pupil relationships within and outside of school, it is very important for all staff to be aware that they hold a legal position of trust and power in relation to pupils. While legal obligations may vary depending on the specific circumstances, the position of trust does not stop when a staff member or a pupil leaves the school. It always applies and under all circumstances.

If ever these positions of trust and power are compromised, this would exceed the boundaries of an appropriate pupil/staff relationship. An abuse and breach of power on the part of the staff member, a breach of their required employment duties and responsibilities, and/or a breach and betrayal of both parental/guardian/responsible adult and public trust, are all detrimental to our pupils and the communities we serve.

The following best practices and strong recommendations are therefore designed to ensure that acceptable boundaries always remain in place. By following these practices, staff can work collaboratively with their school and school division to promote acceptable and proper boundaries with all pupils.



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ACCEPTABLE VS UNACCEPTABLE BEHAVIOURS



The following best practices are particularly designed to raise further understanding of staff- pupil interactions and/or communications that are, could lead to, or may be perceived as flirtatious, sexually suggestive, abusive (physical/mental) or otherwise objectively inappropriate and unacceptable. While these are not the only behaviours and boundaries that might be considered by staff when interacting with pupils, they remain among the most damaging and negative if they do occur, for both pupils and for staff themselves.

Staff are therefore always encouraged to be diligent in avoiding any conduct that is unprofessional; this is to say any act that does not represent a staff-pupil interaction that is required for learning and instruction, or that could be reasonably perceived as a breach of power or trust on the part of the staff member by others.

Compliance with these recommended behaviours is not designed to restrict or challenge staff members' own personal or professional freedoms. Rather, these recommendations are designed to keep staff themselves, their pupils, schools, and school division safe, to minimize potential risk and harm, and to promote the proper exercise of their authority and trust under all circumstances:

BEST PRACTICES



During school hours, it is strongly recommended that:

1. Staff members should not intentionally invite or allow a pupil(s) to visit with them at, meet them at, or conjointly and concurrently make use of a non-school or private property, for any purpose (including a pupil(s)' residence or property), unless
 - i. advance authorization and permission are sought from the staff member's immediate supervisor, and
 - ii. such authorization from the supervisor does permit this interaction to occur.

Please see definitions above for explanation of what is included in "property".

Further,

- a. Subject to 1.(b), staff members who have obtained approval from their immediate supervisor should additionally seek further written approval from the pupil's parent/guardian/responsible adult in advance and this written approval from the pupil's parent/guardian/responsible adult should then be submitted by the staff member to their supervisor at the earliest possible time. Most every school division and school have existing parent/guardian/responsible adult consent or release forms for this purpose.
- b. In circumstances where no parental/guardian/responsible adult approval or consent are required, such as in contexts:
 - i. involving pupils who are legally emancipated; or
 - ii. where notifying the pupil's parent/guardian/responsible adult would create potential harm or risk to the pupil; or
 - iii. where a staff member may be unduly limited, restricted or prohibited from exercising the full scope of their divisionally mandated duties and responsibilities,

The supervisor must carefully consider whether granting permission or approval to a staff member for purposes of engaging in such an interaction poses potential risk or harm to either the staff or pupil. If the supervisor is reasonably satisfied that any potential risk and harm from such interaction between staff and pupil are addressed, they can then grant approval for it to occur.

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²Please see definitions above for explanation of what is included in "property."



- c. If a staff member intentionally interacts with any pupil(s) according to section 1 above more than once per month, a general authorization covering all recurring interactions may be sought by the staff member from both their immediate supervisor as well as from the parent(s)/guardian(s)/responsible adult(s). Again, many schools and divisions can provide permission slips and consent forms that cover the full length of each school year, rather than on an occasional or one-time basis.

Outside of school hours (during weekends, weeknights, holiday/break periods), it is strongly recommended that:

2. If a staff member intentionally invites or allows a pupil(s) to visit with them at, meet them at, or conjointly and concurrently make use of a non-school or private property, for any purpose, including a pupil(s)' residence or property, they should only do so subject to express consent or permission of the parent/guardian/responsible adult of that/those pupil(s). It is critical that such consent or permission remain verifiable if interactions between a staff member and pupil(s) are ever called into question.
3. Interactions between staff and a pupil(s) that may be unintentional – that is to say happenstance or unplanned (e.g. when either a staff member or pupils are acting as a private citizen in community or the neighbouring environs of the school) – remain permissible, although staff members should avoid any such interactions that may give rise to public perception of unprofessional conduct.
4. Interactions between staff and a pupil(s) that may be unintentional– that is to say happenstance or unplanned (e.g. when either a staff member or pupils are acting as a private citizen in community or the neighbouring environs of the school)– remain permissible, although staff members should avoid any such interactions that may give rise to public perception of unprofessional conduct.

In general (both during and outside of school hours) it is strongly recommended that:

5. Staff only create emotional attachments with pupil(s) within the confines of a professional staff-pupil relationship.
6. Staff avoid sharing or disclosing information about their own personal life or the personal of others with any pupil(s), and must never share any information about romantic, sexual, or other types of private and/or sensitive information that is not relevant to the activity and/or instruction in which pupils are engaged.
 - a. Voluntary disclosure of personal information between staff and pupils regarding a staff member's or pupil's personal information and/or sexual orientation, in context of school events and activities designed or intended to foster a supportive learning environment to staff or pupils, remains permissible.
7. Staff avoid giving gifts to an individual pupil that are perceived to be of significant value or of a personal or intimate nature;
8. Staff avoid engaging in any unnecessary physical contact or interactions with a pupil;
9. Staff avoid "singling out" a particular pupil(s) for inappropriate personal attention and/or friendship beyond the usual staff-pupil relationship;
 - a. "singling out" includes making comments or sharing observations concerning a pupil's appearance, dress or other physical or personal characteristics.
10. Staff avoid showing excessive attention and/or favouritism toward a pupil(s);
11. Staff avoid asking or encouraging a pupil(s) to keep specific information or incidents from others;

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BEST PRACTICES CONTINUED



12. Staff avoid making or participating in unacceptable or inappropriate comments and/or jokes of a sexual or profane nature or use inappropriate language/profanity in the presence of a pupil(s);
13. Staff avoid becoming involved with a pupil in such a way that could objectively be viewed as inappropriate or sexual behaviour;
14. Staff avoid engaging in inappropriate use of social media with or about a pupil(s). Many schools and divisions have implemented or adopted relevant social media policies that can help to promote this recommendation;
15. Staff keep appropriate administrator(s) informed when a significant issue develops involving a pupil's welfare. Many schools and divisions have "Duty to Report" (*Child and Family Services Act*, Manitoba Education Administration Handbook) guidance and other relevant policy available to help promote this recommendation;
16. Staff avoid taking on the role of a surrogate parent/guardian/responsible adult for a pupil (even when and where this may be formally requested by child welfare authorities)³³, or criticize the pupil's parents/guardians/responsible adults to the pupil;
17. Staff must not start a personal relationship with a pupil for the purposes of a romantic relationship. Under no context or circumstance should such a relationship occur. It is an outright infringement and violation of the trust and power that defines acceptable boundaries and behaviours;
18. When required to communicate electronically with pupils, staff only do so through an approved medium and using only a recognized school source, device or other approved technology. Such electronic communications, including through social media channels, must be for school-related reasons only and must be professional in all respects;
19. Staff avoid sharing passwords, online handles (names, avatars), names, or identifiers for social media, school or personal email or other means of communication with a pupil(s);
20. Staff minimize and avoid, to the greatest extent possible, being alone in a room with a pupil at school beyond the visibility or earshot of others (for example, with the door closed and/or if other barriers block a clear public view of the room). See next page, re "Rule of Two".

OUTSIDE THE SCHOOL DAY

It is recognized that staff or their children have intentional, amicable or happenstance interactions with other pupils and/or their families outside of school, such as those arising in the course of family, friendship, or community social functions or where there is a formal arrangement for a staff member to supervise, tutor or mentor a pupil in a non-school capacity. Within such relationships and during the course of such interactions, we strongly recommend, again, that staff consult and practice recommendations 2, 3 and 4 as outlined above.

Beyond such interactions, it is strongly recommended that staff must minimize communications with pupils outside of regular school hours, on weekends and during school breaks. For any electronic communication with a pupil(s) outside of regular school hours, on weekends, and when school is on break, it is strongly recommended that staff members copy the pupil's parent(s)/guardian(s)/responsible adult(s) on the communication.

³³Exigent circumstances or emergency contexts should be reviewed and approved by the staff member's supervisor.

“RULE OF TWO”

Staff are also strongly encouraged and recommended to use the **“Rule of Two”**: **having two adults present during the course of any interaction with a pupil(s), in planning for individualized or small group interactions with any pupil(s) during and outside of the school day, to protect pupils and themselves.**



The “Rule of Two” serves to protect staff and pupils in potentially vulnerable situations by ensuring that more than one adult is present when staff are meeting with a pupil both during and outside of the school day. Staff should ensure there is at least one other person, preferably another adult, with them and the pupil at all times. If this is not possible, staff will consider alternative measures, such as having another pupil or staff member present, meeting in a public area within the school (outside of the school would fall under recommendations 1 or 2 above), and/or leaving their classroom or office door open.

DUTY TO REPORT

- If a staff member finds themselves in a difficult situation related to boundaries, have questions related to the conduct outlined above, or have questions on any of the recommendations outlined in this reference guide, they are encouraged to consult their administrator and/or superintendent.
- When any staff member becomes aware of or has reason to believe another staff member is violating acceptable boundaries with a pupil, the staff must report the matter at the earliest possible time to their supervisor and/or superintendent. Not doing so is a violation of legal obligations on the part of every staff member. *The Public Schools Act, The Criminal Code of Canada, and The Child and Family Services Act* each mandate duties for staff to report violations of acceptable boundaries according to the type of violation in question. Other reporting procedures or obligations on the staff member may also be established by a school or division.
- It is strongly recommended that staff members consult with their supervisor if a pupil is, or may reasonably be perceived to be, infringing upon a staff member’s professional and/or personal boundaries, attempting to establish an inappropriate relationship, or engaging in conduct or behaviours that may compromise acceptable and appropriate staff-pupil interactions
- It is strongly recommended that staff members consult with their supervisor if a pupil is, or may reasonably be perceived to be, infringing upon a staff member’s professional and/or personal boundaries, attempting to establish an inappropriate relationship, or engaging in conduct or behaviours that may compromise acceptable and appropriate staff-pupil interactions.



FURTHER CONSIDERATIONS FOR SCHOOL AND DIVISIONAL ADMINISTRATORS

The above recommendations may help to identify specific types of boundaries or behaviours that a school or school division may feel would best be addressed through the formal adoption or implementation of policy or procedure to guide best practice in your school or division. If any school or division wishes to pursue such formal amendments to their policy or procedures regarding any of the acceptable behaviours and/or boundaries outlined in this reference guide, please contact the Manitoba School Boards Association:



Telephone–Winnipeg: (204) 233-1595 / Toll Free: 1-800-262-8836

E-mail: webmaster@mbschoolboards.ca

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ADDITIONAL READINGS AND RESOURCES



- **The Public Schools Act**, sections 47.1.1(1) to 47.1.1(7), 47.1.2.1(1) to 47.1.2.1(5)
Bilingual: https://web2.gov.mb.ca/laws/statutes/ccsm/_pdf.php?cap=p250
- **Manitoba Regulation 37/2012 (Reporting Bullying)**
Bilingual: https://web2.gov.mb.ca/laws/regs/current/_pdf-regs.php?reg=37/2012
- **The Child and Family Services Act**, sections 17, 18
Bilingual: https://web2.gov.mb.ca/laws/statutes/ccsm/_pdf.php?cap=c80
- **Criminal Code of Canada**, sections 153, 273.1(2)(c), PARTS V and VIII
English: <https://www.laws-lois.justice.gc.ca/eng/acts/C-46/index.html>
Français: <https://www.laws-lois.justice.gc.ca/fra/lois/c-46/index.html>
- **Universal Code of Conduct to Prevent and Address Maltreatment in Sport**
English: <https://cces.ca/sites/default/files/content/docs/2025-01/CCES-UCCMS-Final-E.pdf>
Français: <https://cces.ca/sites/default/files/content/docs/2025-01/CCES-UCCMS-Final-Fr.pdf>
- **Coaching Association of Canada – “Rule of Two” webpage:**
English: <https://coach.ca/sport-safety/responsible-coaching-movement/rule-two>
Français: <https://coach.ca/fr/securite-dans-le-sport/mouvement-entrainement-responsable/regle-de-deux>
- **Sport Manitoba – “Safe Sport” webpage:**
English only: <https://www.sportmanitoba.ca/safesport#Why-is-Safe-Sport>
- **For more information and guidance**, please also consult your individual school or school division’s policies or procedures relating to human diversity; the duty to report; use of social media and/or electronic devices; and staff/pupil code(s) of conduct.

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HUMAN TRAFFICKING, CHILD EXPLOITATION, AND NON-CONSENSUAL INTIMATE IMAGES IN MANITOBA SCHOOLS

A BRIEF REFERENCE GUIDE



INTRODUCTION

The following reference guide has been prepared in supplement to the recommended Staff- Pupil Interaction Best Practices Reference Guide developed by the Manitoba School Boards Association and Manitoba Schools Insurance. A caveat: the topics addressed in this guide deserve far greater treatment and expansion. The intention of the guide is to provide a summary overview of the most important considerations and information divisional staff and volunteers may need to address trafficking, exploitation and sharing of non-consensual intimate images (from here on “intimate images”). Responding to trafficking, exploitation and intimate images must be situated in a context of multi-sectoral wraparound supports and services (involving health, police, justice, social services and education), so the guide’s purpose is to provide an “ease of use” reference to orient and introduce school staff and volunteers to these significant topics.

Included are explanations of human trafficking, child sexual exploitation and intimate images; a profile of victims; signs and symptoms demonstrated by victims of these crimes; a discussion regarding consent as well as child marriage; awareness of appropriate steps to take and how to respond to sharing of intimate images; a list of emergency contacts; some additional considerations for schools and school boards when responding; and an abbreviated list of additional readings and resources. Please note that the section on intimate images starts at [page 15](#).

DEFINITIONS



- **parent/guardian/responsible adult** shall be interpreted to mean any person who exercises parental duties and obligations over a pupil by virtue of biological, adoptive, customary, temporary ward or custody, host family arrangement, or through other legally defined responsibility.
- **pupil** shall be interpreted to mean any person attending or participating in school instruction or activities inside or outside of Manitoba.
- **staff or staff member(s)** includes all school division employees including administration, teaching and non-teaching staff, as well as coaches, volunteers, teacher candidates and practica candidates. Where a school board member or trustee may also interact with pupils without supervision, this definition would equally apply.

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WHO IS THE INTENDED AUDIENCE OF THIS GUIDE?

It is critical that the information in this reference guide be provided to all staff in Manitoba schools to promote greater awareness of the harms and risks of trafficking, sexual exploitation, and sharing of intimate images in the school context, to provide meaningful resources, as well as for purposes of general orientation of staff prior to interacting with pupils or when accessing documents shared electronically or in hard copy. The materials are also intended to provide necessary information for the benefit of school and divisional administrators, including school boards.

WHAT ARE HUMAN TRAFFICKING AND CHILD SEXUAL EXPLOITATION? WHAT IS AN INTIMATE IMAGE?

During the course of your career working or volunteering in and for schools and in your interactions with pupils, you may one day interact with a trafficked and/or sexually exploited pupil. You may also receive an intimate image because a third party has sent this to you (please see [page 15](#) for further guidance regarding intimate images).

According to the law in Manitoba⁴ :

HUMAN TRAFFICKING

A person commits human trafficking of another person when they abduct, recruit, transport or hide that person, or control, direct or influence the movements of that person; and they use force, the threat of force, fraud, deception, intimidation, the abuse of power or a position of trust, or the repeated provision of a controlled substance (ex: drugs/inhalants/alcohol), to cause, compel or induce that person to:



- become involved in prostitution or any other form of sexual exploitation,
- provide forced labour or services, or
- have an organ or tissue removed.

CHILD SEXUAL EXPLOITATION

Child sexual exploitation occurs where a child is compelled by force, the threat of force, intimidation or the abuse of power or a position of trust to engage in sexual conduct; or there is an exchange of a controlled substance (ex: drugs/inhalants/alcohol) for sexual conduct. Sexual conduct includes four types of behaviours:

- sexual intercourse
- touching the body of any person for a sexual purpose
- exposing a person's sexual organs or anal region or exposing the breasts of a female person
- any activity related to child pornography as defined in *The Criminal Code of Canada*⁵.

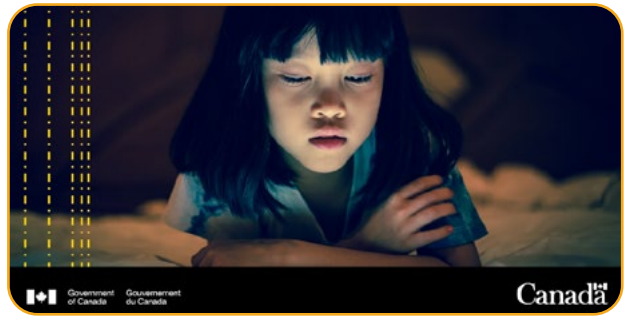
⁴See *The Child Sexual Exploitation and Human Trafficking Act / Loi sur l'exploitation sexuelle d'enfants et la traite de personnes*
<https://web2.gov.mb.ca/laws/statutes/ccsm/c094.php?lang=en>

⁵See *The Criminal Code of Canada*

English: <https://www.laws-lois.justice.gc.ca/eng/acts/C-46/index.html> Français: <https://www.laws-lois.justice.gc.ca/fra/lois/c-46/index.html>
Français: <https://www.laws-lois.justice.gc.ca/fra/lois/c-46/index.html>

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ONLINE SEXUAL EXPLOITATION⁶



- Child sexual abuse material – Actual, but also fictitious, written depictions of child sexual abuse, audio, video, and images, also known as child pornography;
- Self-generated materials and sexting – Youth-generated explicit images/videos on the Internet, which are often further distributed without consent;
- Sextortion – Use of coercion and threats to extort child sexual exploitation images/videos from youth (either by other youth or adult offenders);
- Grooming and luring – Use of applications and platforms to connect with children and youth for the purpose of sexually exploiting them;
- Live child sexual abuse streaming – Viewing of child sexual abuse in real-time, often involves the offender directing the abuse; and
- Made-to-order content – Ordering videos/images to suit offenders' preferences.
- Exploitation online has also increasingly included monetary scams and/or extortion.

WHO ARE THE TYPICAL VICTIMS?⁷

It is estimated that hundreds of children, youth and adults are victimized in the visible sex trade in Manitoba each year. It is also estimated that thousands are victimized in the invisible sex trade that takes place in hidden venues such as private homes and drug houses located throughout the province.

Most adult sex trade workers report that their victimization began at a very young age; sometimes as young as 9, and at an average age of 14.

The victims of human trafficking are overwhelmingly girls and younger women, especially under the age of 35.

- Ninety-five per cent of human trafficking victims are girls and women. (Stats Canada)
 - Of those victims, 89 per cent are under the age of 35.
 - Over 20 per cent are under the age of 18 and 43 per cent are between the ages of 18 to 24.
 - One in three victims reported some kind of physical injury related to the incident.
- Only 11 per cent of victims were trafficked by a stranger, most are trafficked by someone they know.
 - For 29 per cent of victims, their trafficker was a friend or acquaintance.
 - For 25 per cent of victims, their trafficker was a current or former boyfriend or girlfriend.

⁶See Public Safety Canada / Sécurité publique Canada

English: <https://www.publicsafety.gc.ca/cnt/cntrng-crm/chld-sxl-xplttt-ntrnt/index-en.aspx>

Français: <https://www.securitepublique.gc.ca/cnt/cntrng-crm/chld-sxl-xplttt-ntrnt/index-fr.aspx>

⁷Sources– English: <https://gov.mb.ca/fs/traciasttrust/how.html>;

Français: <https://gov.mb.ca/fs/traciasttrust/how.fr.html>

English only (en anglais seulement): <https://winnipeg.citynews.ca/2021/10/17/by-the-numbers-human-trafficking-in-canada/>

While human trafficking and child sexual exploitation occur in every community and across every socio-economic strata, members of racialized communities including Indigenous and newcomer communities as well as pupils who are 2SLGBTQI+*, homeless and/or youth-in-care, are generally at greater risk of victimization from trafficking and sexual exploitation.

Without intervention, trafficked and/or sexually exploited youth are at far greater risk of:

- violence, including abusive relationships, sexual assault and homicide;
- sexually transmitted diseases;
- gang involvement;
- early pregnancy;
- mental health difficulties;
- academic difficulties;
- involvement with the child and family services and criminal justice systems;
- long term dependence on social services and government assistance; and
- raising children who are much more likely to repeat the same cycle.



WHAT ARE SOME SIGNS AND SYMPTOMS OF TRAFFICKED OR SEXUALLY EXPLOITED PUPILS?⁸

While the following provides a non-exhaustive list, staff interacting with those pupils who are victims of trafficking or sexual exploitation should be aware that school-aged victims tend to:

- Demonstrate higher than normal evidence of transiency, or of being moved frequently from school to school or community to community; they may also claim to be “new” or “just visiting.”
- Demonstrate higher rates of absenteeism, whether excused or unexcused, including working during school hours.
- Refuse to develop or demonstrate reluctance to develop relationships with peers or join with peer circles or in school activities; may be subject to sudden ostracism by friends and peers.
- Exhibit higher than normal degrees of fear, worry and anxiety, or are easily intimidated.
- May be dressed in age inappropriate clothing.
- May be dressed in clothing inappropriate for the time of year or context.
- May suddenly have expensive clothing, purses, shoes, nail services.
- Branding with tattoos featuring names or symbols.
- May have bruises or other signs of physical abuse including frequent hunger and/or being malnourished.
- Discuss opportunities or jobs in other jurisdictions.
- Carries a cell phone, makes regular calls during school hours, and is secretive or fearful regarding phone and internet or electronic device usage.
- Begins spending more time using internet, or electronic devices. Hides screens, discusses interacting with “online friends” more frequently, or discloses in-person meeting of online friends and contacts.

Staff and volunteers are strongly encouraged to consult the “other readings and resources” section of this reference guide to learn about other signs and symptoms.

*2SLGBTQI+ stands for Two-Spirit, Lesbian, Gay, Bisexual, Transgender, Queer, Intersex, and the ‘+’ includes other sexual and gender diverse identities.

⁸See generally (in English only/en anglais seulement): <https://www.canadiancentretoendhumantrafficking.ca/signs-of-human-trafficking/> and https://www2.gov.bc.ca/assets/gov/law-crime-and-justice/criminal-justice/victims-of-crime/human-trafficking/training/resources/printable/mod3_info_sheet2.pdf

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Foreign resident and/or international pupils

It is also very important to consider that, in the context of international and foreign resident pupil placements, children who are:

- registered or enrolled in school by a guardian(s) without furnishing identity documents, or authority or permissions from state welfare authorities; or
- registered or enrolled by one parent and/or step-parent or a family relation without providing sufficient evidence of identification or additional parental permission or consent, may in fact be trafficked or abducted children. In such instances, the duty and obligation of a school division or school to enroll and accommodate pupils in school must be carefully reviewed and implemented by the school division. It is critical that possible cases of cross-border or international abduction and trafficking be reported at the earliest time to avoid a school becoming an accessory to these offences. Please see the emergency contacts section for relevant information.

CLARIFICATION REGARDING SEXUAL CONSENT¹⁰



It is important that school staff understand that any sexual relationship between a pupil and a staff member is never justified under legal definitions of consent. Quite the contrary, any person who remains in a position of trust or authority relative to a pupil of any age, commits sexual exploitation if sexual relationships occur. This includes the full spectrum of sexual contact, from kissing and touching to intercourse. In Manitoba, staff working with pupils are designated as “in loco parentis” under the law, meaning that they serve as temporary guardians of all pupils and are expected to act according to parental behaviour, whether or not these pupils have reached the legal “age of sexual consent.” This principle establishes a clear position of trust and authority between all staff and volunteers relative to pupils.

In terms of sexual relationships between pupils and persons not employed or volunteering in a school, sexual exploitation can also occur depending upon the context—whether or not the age of the other party is the same or similar to that of the pupil. Please consult the additional reading at footnote ⁹ for further information.

CHILD MARRIAGE

While infrequently encountered in schools, underage or child marriage continues to occur in Manitoba. Child marriage, defined as formal or informal marriage before the age of 18, is a globally recognized indicator of gender inequality. Child marriage remains legal throughout Canada. Data from vital statistics agencies and recent censuses indicate that child marriage, although rare, is practiced across the country. In 2016, nearly 2,300 children between 15 and 17 years of age were in union, a prevalence of 0.2 percent. The vast majority (98 percent) of these were informal, common-law unions. Demographic patterns of child marriage in Canada are similar to those observed in many low- and middle-income countries. Girls are far more likely to be married as children than boys, and typically wed much older spouses. The highest estimates of child marriage rates are found in Alberta, Manitoba, Saskatchewan, and the northern territories.¹⁰

Child Marriage continued on next page.

⁹Please also consult Justice Canada/Ministère de la justice Canada—
English: <https://www.justice.gc.ca/eng/rp-pr/other-autre/clp/faq.html>
Français: <https://www.justice.gc.ca/fra/pr-rp/autre-other/clp/faq.html>

¹⁰Source: Koski, A. “Child marriage in Canada”, Population and Development Review. Accessed online, October, 2025 at:
<https://onlinelibrary.wiley.com/doi/pdf/10.1111/padr.12369>

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If a pupil discloses intentions for marriage, it is important to determine whether or not the pupil is at least 16 years of age (as per *The Marriage Act*) and fully consents to the marriage. If they seek help or support to avoid entering into a marriage, please consult the emergency contacts below. Any child that does not wish or consent to be married is, according to legal definition, at risk of becoming a sexually exploited child.¹¹

HOW CAN YOU HELP?

- **Police**—In an **emergency**, contact your local police emergency number. If you feel a child is in immediate danger, call 911 or, if 911 service is not yet available in your community, call your local Royal Canadian Mounted Police (RCMP) detachment or police department.
- For a list of RCMP detachments in Manitoba, please visit:
English: <http://www.rcmp-grc.gc.ca/detach/en/find/MB>
français: <https://www.rcmp-grc.gc.ca/detach/fr/find/MB> or consult footnote 9 for local policing authority contacts in specific communities across Manitoba.¹²
- **Non-Emergency—Manitoba Child and Family Services**— If you think a child is being harmed or neglected, contact Child and Family Services at **1-866-345-9241**.
- **Local Trafficking Hotline—‘Call the Line’**. Available 24/7, operated by Klinik Community Health Centre. Toll-free **1-844-333-2211**. Klinik will provide support province-wide across Manitoba.
- **Canadian Human Trafficking Hotline**—If someone you know may be a victim of human trafficking outside of Manitoba or across jurisdictional borders, you can call the Canadian Human Trafficking Hotline: **1-833-900-1010**.
- **Cybertip Reporting**— for reporting the online sexual exploitation of children
English: https://www.cybertip.ca/en/report/?utm_campaign=sl&utm_term=/app/en/report
Français: <https://www.cybertip.ca/fr/signalement/>



Canadian
Human
Trafficking
Hotline

Ligne d'urgence
canadienne
contre la traite
des personnes



¹¹See generally footnotes ¹ and ², read in conjunction with *The Marriage Act*—
English: <https://web2.gov.mb.ca/laws/statutes/ccsm/m050e.php>
Français: <https://web2.gov.mb.ca/laws/statutes/ccsm/m050f.php>

¹² Altona Police Service—Phone 911 or Emergency 24 hour line: 204-324-5353

Brandon Police Service—Phone: 911

Cornwallis Police Service—Phone: Chief's direct line: 204-724-7999

Manitoba First Nation Police Service—Phone: 204-856-5370

Military Police (Shilo)—Phone: 204-765-3337

Morden Police Service—Phone: 911 or 204-822-4900

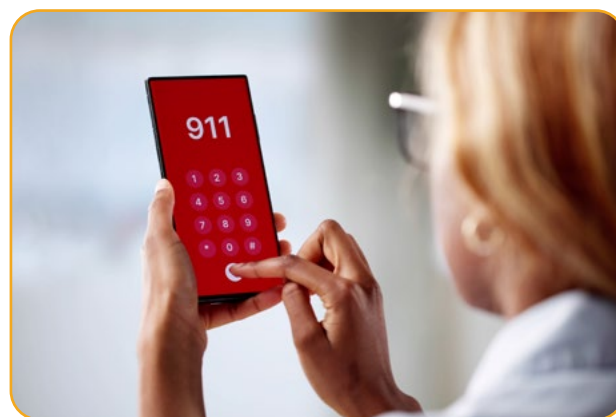
Springfield Police Service—Phone: 911

Ste. Anne Police Service—Phone: 204-422-8209

Victoria Beach Police Service—Phone: 204-756-2322

Winkler Police Service—Phone: 911 or 204-325-0829

Winnipeg Police Service—Phone: 911



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WHAT ARE SOME ADDITIONAL CONSIDERATIONS FOR THOSE WORKING WITH PUPILS IN SCHOOLS?

There are no “one size fits all” resources or practices that will serve to address the specific needs of every pupil or every school community. However, experiences across Canada have demonstrated that school boards and local schools that practice or have adopted the following strategies to address and combat human trafficking and child sexual exploitation can make a significant difference in their communities:

- Mandatory education and training for all staff and volunteers— in Manitoba, effective as of the 2022/23 school year, all staff and volunteers in schools must complete the Respect in Schools or Commit 2 Kids education and training programs. Staff and volunteers providing supervision of intramural and extra-curricular athletics activities must further complete the Respect in Sport program.¹³ Completion of these programs, and continuing competence in the topics featured in these programs, serves to increase awareness and promote understanding of many forms of neglect, bullying, harassment and abuse, including sexual exploitation and abuse.
- Integration of topics on human trafficking and sexual exploitation into the school curriculum— in Manitoba, topics of human sexuality and healthy sexual relationships have been integrated into the required learning outcomes across the K-12 health and physical education curriculum. Highlighting human trafficking and sexual exploitation (online/ virtual and/or physical) can be addressed as part of these learning outcomes. These topics can also be featured under digital and information and communication technologies literacy curriculum. Ontario has developed some useful online learning tools (see links accessible at footnote ¹⁴: *Speak Out: Stop Sex Trafficking* and *The Trap*) that can support integration of anti-human trafficking and sexual exploitation topics into middle and senior years’ curricula.¹⁴
- Establishment of comprehensive plans and strategies including community-focused advisory structures— in Ontario, the Ministry of Education has adopted Memorandum 166, a mandatory statement of principles that is to be implemented by all school boards.

Under the principles, boards are required to: define a role for parents/guardians/caregivers; foster student voices; build multi-sectoral relationships with community organizations; ensure that interventions for trafficking and exploitation are safe; build up school-based prevention; respect confidentiality, privacy and informed consent; and promote equitable and culturally safe responses.¹⁵

All school boards in Manitoba are encouraged to review Memorandum 166 by way of integrating these important principles into their own local practice. Among the principles outlined, responding to school-based incidents or cases of trafficking or sexual exploitation must reflect the highest standards of safety, confidentiality, privacy, equity and cultural competency.

¹³Respect in Schools English: <https://www.respectgroupinc.com/respect-in-school/>
Respect à l'école Français: <https://french.respectgroupinc.com/respect-in-school/>
Respect in Sport English: <https://www.respectgroupinc.com/respect-in-sport/>
Respect et Sport Français: <https://french.respectgroupinc.com/respect-in-sport/>
Commit 2 Kids English: <https://commit2kids.ca/en/>
Priorité Jeunesse Français: <https://commit2kids.ca/fr/>

¹⁴English: <https://news.ontario.ca/en/release/58193/ontario-launches-new-tools-to-help-prevent-human-trafficking>
Français: <https://news.ontario.ca/fr/release/58193/ontario-lance-de-nouveaux-outils-pour-aider-a-prevenir-la-traite-des-personnes>

¹⁵English: <https://www.ontario.ca/document/education-ontario-policy-and-program-direction/policyprogram-memorandum-166>
Français: <https://www.ontario.ca/fr/document/education-ontario-directives-en-matiere-de-politiques-et-de-programmes/politiqueprogrammes-note-166>

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OTHER READINGS AND RESOURCES

Government of Manitoba, Department of Families, Tracia's Trust:

English— <https://gov.mb.ca/fs/traciastrust/how.html>

French— <https://gov.mb.ca/fs/traciastrust/how.fr.html>

Canadian Centre to End Human Trafficking: <https://www.canadiancentretoendhumantrafficking.ca/>

Canadian Centre for Child Protection:

English— <https://www.protectchildren.ca/en/>

Français— <https://www.protectchildren.ca/fr/>

INTIMATE IMAGE(S)

According to *The Criminal Code of Canada*, section **162.1 (1) (2)** an intimate image:

means a visual recording of a person made by any means including a photographic, film or video recording,

- a. in which the person is nude, is exposing their genital organs or anal region or her breasts or is engaged in explicit sexual activity;
- b. in respect of which, at the time of the recording, there were circumstances that gave rise to a reasonable expectation of privacy; and
- c. in respect of which the person depicted retains a reasonable expectation of privacy at the time the offence is committed.

Section **162.1 (1)** further specifies:

Everyone who knowingly publishes, distributes, transmits, sells, makes available or advertises an intimate image of a person knowing that the person depicted in the image did not give their consent to that conduct, or being reckless as to whether or not that person gave their consent to that conduct, is guilty:

- a. of an indictable offence and liable to imprisonment for a term of not more than five years; or
- b. of an offence punishable on summary conviction.¹⁶

For purposes of **section 162.1** of the *Criminal Code*, **all staff members are encouraged to assume that any intimate image that they may receive is being received without the consent of the person who is the subject of the intimate image.**

It is also important for staff to understand that an intimate image is an intimate image, whether or not the victim portrayed or depicted in the image is a minor or an adult. An intimate image may be defined as child pornography or child exploitation if the subject is in fact a minor but the age of the victim is not for staff concern: what is of concern is what must be done if an intimate image of any kind is received.

¹⁶English: <https://laws-lois.justice.gc.ca/eng/acts/C-46/section-162.1.html>

Français: <https://laws-lois.justice.gc.ca/fra/lois/c-46/section-162.1.html>

WHAT SHOULD YOU DO WHEN YOU RECEIVE AN INTIMATE IMAGE?

In terms of intimate images, anyone can become a victim of this crime, and it also follows that anyone can receive an intimate image without their own consent or the consent of the victim when this is shared with them by a third party.

If any staff member accesses mail, e-mail messages, or any other form of communication involving the distribution of an intimate image by a third party, it is very important to understand that while you yourself are not defined under the law as a victim of this crime, the next steps that you take once an intimate image is received or accessed are very important for your own potential criminal liability and to avoid any further injury to the victim, which is critical.

It is equally important to recognize that these next steps apply to your work as staff and all school division or district-owned devices that you may use. Similarly, if a message is received on your personal device (which is not owned by your school division or district) but is addressed to you as a staff member, then these steps would also apply.

STEP #1: Do not copy, further access or repeat any view of the image. Do not send, forward or further distribute the image or message containing the image to others. Never show the image to any one else, even if the image is displayed on the screen of your electronic device (such as a computer, laptop, tablet, cell- or smartphone, watch or any other method used for receiving such forms of communications).

STEP #2: Do not alter, delete or destroy the message or other communication method (text message, upload, download) which contains the intimate image.

STEP #3: Power off your computer or any other device on which you have received or accessed the intimate image. Do not turn the computer or other device back on. Do not destroy, tamper or in any way alter or attempt to alter the device or the server (including the electronic cloud) used by the device.

STEP #4: it is important that your direct supervisor be informed that you have received an intimate image, that you have secured the device and its content by powering off the device, and that you no longer have or can access the computer or other device on which the image was received. This communication cannot be sent via the device that received the intimate image. As such, the communication may need to be verbal.

STEP #5: Your supervisor must notify your Superintendent before you undertake any further action in respect of the device or the intimate image. Legal counsel must be contacted and must provide advice to the Superintendent before any further steps are undertaken.

STEP #6: Never show the intimate image to anyone once the device has been powered off until directed by your legal counsel. Under no circumstances must the intimate image be reviewed by a staff supervisor or by divisional or district administration.

What you must do as a staff supervisor and senior administrator (of a school division or district) if an intimate image is received by your staff member(s).

In keeping with Step #5 above, any staff supervisors who receive a report that an intimate image has been received by a staff member(s) should immediately contact the Superintendent of the school division and district and explain that an intimate image has been received by a staff member(s). Staff supervisors should not do anything further until legal advice has been obtained by the Superintendent of the school division or district.

Superintendents or other members of division or district senior administration must contact legal counsel for appropriate advisement when a staff supervisor has notified them that an intimate image has been received.

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