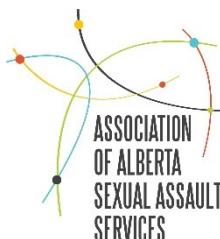




Attainable Housing: Preventing Human Trafficking & Supporting Survivors

Written submission to the Government of Alberta



Dear Minister:

We represent organizations that are dedicated to supporting human trafficking survivors in Canada. Each day, our trained staff help vulnerable individuals avoid harm, exit their trafficking situations, and gain access to housing and other supports they depend on for their recovery. This work gives us a unique perspective into where we are collectively making progress. It also allows us to see where additional work is needed in our shared fight to end human trafficking in Canada.

Growing evidence demonstrates strong linkages between homelessness, housing precarity, and human trafficking.¹ Lack of access to secure and safe housing creates significant emotional, financial, and physical vulnerabilities that traffickers exploit. Once in a trafficking situation, survivors' inability to access secure housing is the most significant barrier to leaving, and far too many are forced to remain with their traffickers.

A range of safe, secure, and affordable housing options is critical to disrupting human trafficking. It is essential for protecting people from being exploited, helps victims exit their trafficking situation, and creates stability for survivors as they recover. Housing, therefore, must be a priority in local, provincial, and federal responses to human trafficking in Canada.

Between 2019 and 2022, the Canadian Human Trafficking Hotline received 3,059 signals related to human trafficking across the country. Shelter and housing supports for victims and survivors were the most requested referrals on those signals.² Unfortunately, Hotline staff regularly find it difficult to connect survivors with immediate, short-, and long-term housing options due to gaps in policy and programming.

The enclosed pre-budget submission identifies where policy gaps exist across the housing continuum³ and where the province can make a difference. In keeping with this, **we are calling on the Alberta government to:**

1. Establish a provincial Survivors' Advisory Committee to incorporate survivors' lived experiences, voices, and insights into legislation and policy decisions.
2. Mandate that the Alberta Office to Combat Trafficking in Persons (AOCTIP) work closely with the Ministry of Seniors, Community, and Social Services to apply a human trafficking lens to all housing and homelessness programming.
3. Adequately fund the operation of housing dedicated to victims and survivors of human trafficking, including short-term (e.g. safe houses) and medium-term (e.g.

transitional) housing. This housing should be equipped to support the unique needs of historically marginalized populations that are particularly vulnerable to trafficking, including LGBTQ2S+ adults and youth, Indigenous peoples, migrant workers, and people of colour.

4. Increase funding for emergency shelters, transitional, and supportive housing agencies, and establish multi-year allocations. This funding should be used to pay for more human trafficking-specific beds in existing buildings, enhance staffing salaries, and provide trauma-informed support to survivors that transition through various housing options.
5. Mandate and fund annual anti-human trafficking training for shelter, transitional, and supportive housing providers to help identify the signs of trafficking, support victims, and prevent human trafficking.
6. Ensure human trafficking survivors are included in the province's prioritization process for social and affordable housing units.
7. Prioritize financial security for survivors by passing legislation that forgives survivors of fraudulent debt, including student debt held by governments, incurred during their trafficking situation and invest in financial literacy programs that reintroduce survivors to banking systems and encourage financial self-sufficiency.
8. Increase Alberta's social and affordable housing stock to make safe and secure housing more accessible.

We believe that implementing these 8 recommendations is critical to preventing human trafficking and supporting survivors on their path to recovery.

Thank you for taking the time to review our letter. We would welcome the opportunity to speak with you about our recommendations – and how we can support you in bringing them to fruition – at your earliest convenience.

Yours sincerely,



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Detailed Recommendations

1. The Government of Alberta should establish a provincial Survivors' Advisory Committee to incorporate survivors' lived experiences, voices, and insights into legislative and policy decisions.

Survivor stories and experiences were influential in the development of the Alberta Human Trafficking Task Force's Final Report, and their voices should continue to inform the implementation of the report's recommendations. Whether incorporated into the AOCTIP or established as a separate entity, a Survivors' Advisory Committee will provide human trafficking victims and survivors a platform to offer ongoing advice to the Government of Alberta. This includes recommendations on how to improve the safety, adequacy, and availability of housing. Funding must be set aside to adequately compensate members of this committee and recognize their invaluable contribution to anti-trafficking work.

2. Mandate that the Alberta Office to Combat Trafficking in Persons (AOCTIP) work closely with the Ministry of Seniors, Community, and Social Services to apply a human trafficking lens to all housing and homelessness programming.

Alberta's 2023 budget included funding to establish an Office to Combat Trafficking in Persons (AOCTIP), a key *Call to Action* in the Human Trafficking Task Force's Final Report⁴ and a positive step toward coordinating anti-trafficking activities in the province. AOCTIP will oversee the development of a community response model that provides a "continuum of immediate, coordinated, and long-term care ensuring prioritized access, no barriers, and a wraparound collaborative approach."⁵

Since housing is such a vital part of this continuum of care, the Ministry of Seniors, Community, and Social Services (MSCSS) should be heavily involved in the AOCTIP's work. More specifically, AOCTIP and MSCSS should collaboratively undertake the following activities:

- a)** Conduct a thorough review of current programming to identify the processes that deter or prevent human trafficking survivors from accessing shelters and housing options. This includes eligibility, intake, and program requirements such as immigration status, location-specific service provision, and conditions of stay policies (e.g. use of substances). Human trafficking survivors, service providers, and case managers should be consulted to clarify where the barriers and challenges exist.

- b)** Immediately respond to the program review by addressing the barriers and challenges that deter or prevent survivors from using shelters and housing options.
- c)** Ensure that an anti-human trafficking lens is always applied when assessing existing, or creating new, housing and social support programs.
- d)** Ensure that migrant workers can access safe and decent housing options by working with the Ministry of Jobs, Economy and Northern Development and the Temporary Foreign Worker Advisory Office.

3. Adequately fund the operation of housing dedicated to victims and survivors of human trafficking, including short-term (e.g. safe houses) and medium-term (e.g. transitional) housing. This housing should be equipped to support the unique needs of historically marginalized populations that are particularly vulnerable to trafficking, including LGBTQ2S+ adults and youth, Indigenous peoples, migrant workers, and people of colour.

Human trafficking victims/survivors have unique needs that often cannot be met at shelters designed for people experiencing homelessness or intimate partner violence. Shelter policies, such as curfews, scheduled closures during the day, restrictions on substance use, and requirements to do chores, may unintentionally harm survivors in their recovery.⁶

Victims/survivors may be looked down on by others in shelters because of the stigma associated with being in the sex industry⁷ and the discrimination and racism they face because of their identity (e.g. Indigenous, LGBTQ2S+) or precarious immigration status (e.g. migrant workers, people without legal status). These groups are particularly vulnerable to trafficking because they face higher rates of violence, economic instability, and social isolation than the general population. Robust security protocols, especially in domestic violence shelters, help to mitigate safety risks for residents but are not always enough to deter traffickers from looking for survivors who have escaped or recruiting new victims within the shelter system.⁸ For shelters that operate in rural areas of the province, the lack of anonymity increases the need for additional layers of security to keep victims/survivors safe.

More housing options for victims/survivors are required and should be barrier-free, flexible, and safe. Accompanying supports need to be trauma-informed and culturally relevant to take into consideration the unique needs of vulnerable population groups.

4. Increase funding for emergency shelter, transitional, and supportive housing agencies, and establish multi-year allocations. This funding should be used to pay for more human trafficking-specific beds in existing buildings, enhance staffing salaries, and provide trauma-informed support to survivors that transition through various housing options.

- a)** Increase funding for additional beds, including those specifically reserved for victims of human trafficking whose needs differ from those experiencing homelessness or other forms of gender-based violence. In 2021, Alberta's shelter capacity consisted of 2,254 emergency (homeless) shelter beds, 711 transitional housing beds, and 1,297 domestic violence shelter beds.⁹ Unfortunately, the existing supply is not able to meet increasing demand. For example, in the domestic violence sector alone, shelters were only able to accommodate 17% of requests for admission in the 2021/22 fiscal year.¹⁰
- b)** Commit to multi-year funding allocations, indexed to inflation, to shelter and housing agencies. Low staffing levels and relatively low pay leading to high turnover and burnout cause additional strains on shelter capacity. While the 2023 budget has increased funding to strengthen frontline staffing in the social services sector, only a fraction of that amount will go to homeless shelter workers (7%), and none is earmarked for domestic violence shelter workers.¹¹ That sector in particular has not seen an increase in government funding since 2015.¹²
- c)** Establish a designated caseworker or service provider to help survivors navigate the entire housing and shelter system. This should be a specialized position requiring qualification and education levels that are commensurate with the complex needs of victims/survivors. During The Centre's consultations with stakeholders, the lack of continuity in support when moving between housing options (e.g. from shelter to transitional to permanent housing) was identified as a barrier to recovery. Establishing specialized caseworkers for trafficking survivors aligns with the Alberta Human Trafficking Task Force's call for a province-wide, coordinated community response model that addresses all aspects of recovery, including shelter and housing.¹³
- d)** Include funding to address the transportation challenges faced by shelter and housing services in rural Alberta. Funding for social services is not always prioritized in rural areas with low population density. Limited public transportation within and between communities makes it particularly challenging

for survivors to access the shelter and housing options they need. The province should examine how it can make transportation funding more flexible and allow for collaborative and innovative solutions (e.g., taxi chits, vehicle sharing between agencies).

5. Mandate and fund annual anti-human trafficking training for shelter, transitional, and supportive housing providers to help identify the signs of trafficking, support victims, and prevent human trafficking.

When specialized housing options are unavailable to victims/survivors of human trafficking, they are often served by homeless and domestic violence shelters as well as transitional and supportive housing programs. The needs of human trafficking victims/survivors are different from those experiencing homelessness or other forms of gender-based violence. Unfortunately, providers may not be equipped to support the unique needs of those impacted by trafficking. In fact, certain program components or requirements may unintentionally harm them. For example, control over substance use, requirements to do chores, and the implementation of curfews could mirror trafficking experiences and re-traumatize victims and survivors.¹⁴ Therefore, it is vitally important to increase the capacity of shelter and housing operators to identify and support victims/survivors and prevent instances of trafficking from taking place within shelters. This training needs to be ongoing and trauma-informed so as not to revictimize survivors.

6. Ensure human trafficking survivors are included in the province's prioritization process for social and affordable housing units.

The province's social and affordable housing system prioritizes applicants based on point-scoring outlined in the *Social Housing Accommodation Regulation, Schedule A, Part 1*.¹⁵ In order to determine the level of need, points are allotted for a number of factors including:

- income;
- utility responsibility;
- health and safety risks;
- household composition;
- impact on personal well-being, and;
- vulnerable or 'target' populations that align with the federal National Housing Strategy.¹⁶

Ten points are awarded per population group to a maximum of 20 points, which means that only two groups can be counted in the prioritization process. Although victims and survivors of human trafficking most certainly fall under a number of the “target populations” (e.g. Indigenous peoples, women and children fleeing violence, people experiencing homelessness, and youth exiting government care), The Centre recommends adding them as a separate population. Doing so will reflect the unique and urgent nature of survivors’ situations and will ensure they can be prioritized for units more quickly. Resources also need to be allocated towards Housing Management Bodies and other housing providers to develop processes and procedures to support this change.

7. Prioritize financial security for survivors by passing legislation that forgives survivors of fraudulent debt, including student debt held by governments, incurred during their trafficking situation.

Financial abuse, particularly in the form of fraudulent or coerced debt, is common in human trafficking situations. Traffickers often threaten, force or trick victims/survivors into paying for hotels, car rentals, gas, food, rent, and other expenses. Some are forced to take out personal loans, student loans, open lines of credit, or apply for social benefits that are turned over to the trafficker. This destroys survivors’ financial standing and credit rating, making it very difficult for them to access any type of housing (e.g. social, affordable, or market).

The Centre calls on the Government of Alberta to follow other Canadian jurisdictions¹⁷ by introducing and passing legislation to forgive fraudulent debt incurred during a trafficking situation. Credit agencies should also be barred from publishing coerced debt information on credit reports. This recommendation aligns with the Alberta Human Trafficking Task Force’s call to create, update, and harmonize human trafficking-specific legislation.¹⁸ In addition, The Centre calls on the Government of Alberta to invest in financial literacy programs that reintroduce survivors to banking systems and encourage financial self-sufficiency.

8. Increase Alberta's social and affordable housing stock to make safe, secure housing more accessible.

Approximately 9% of renter households in Alberta are in some form of subsidized housing (about 57,000 households).¹⁹ It is a vital component of housing infrastructure that, in light of the rising cost of rental housing in the province,²⁰ is one of the few options available to people living with low incomes. Slow construction starts, along with complex and time-consuming eligibility and application requirements, have made social/affordable housing difficult to access. In Alberta, approximately 24,000 households are on a waitlist for subsidized accommodation.²¹

In the 2021 affordable housing strategy, the Government of Alberta committed to increasing the province's social and affordable housing stock to support an additional 25,000 households over 10 years.²² While The Centre applauds this commitment, the province needs to double its social housing stock to help bring Canada in line with the OECD's average. This ambitious investment would address the growing needs of Albertans generally, and human trafficking survivors specifically.²³

Endnotes

¹ Public Safety Canada. (2018). [2018 Human Trafficking Consultations Report](#). Government of Canada.

² Canadian Human Trafficking Hotline Data. Date range is from May 29, 2019 (when the hotline was launched) to December 31, 2022. Signals include phone, webchat, email, and webform. Data collection is an important, but secondary, purpose of the hotline. Staff take a trauma-informed approach when engaging with signalers. This means that signalers are not asked probing questions and are not required to provide specific demographic or geographic information in order to receive service. For this reason, hotline data is subject to minor variances and likely underrepresents instances of trafficking in Canada.

³ Adapted from the [Canada Mortgage and Housing Corporation](#). Retrieved November 17, 2022.

⁴ The Alberta Human Trafficking Task Force. (2021). [The Reading Stone: The Survivor's Lens to Human Trafficking](#).

⁵ Ibid, p. 35.

⁶ Polaris (2018, October 30). [The Role Domestic Violence Shelters Play in Supporting Human Trafficking Survivors](#). Retrieved March 15, 2023.

⁷ Gray, M., Hoffman, C., Ranasinghe, K., Scholz, J., and Smith, M. (2021). [The demand for housing trafficked persons in Ontario](#). Fight4Freedom, p. 11.

⁸ Noble, A., Coplan, I., Neal, J., Suleiman, A., & McIntyre, S. (2020). [Getting out: A national framework for exiting human trafficking for sexual exploitation in Canada](#). Toronto, ON: Covenant House Toronto & The Hindsight Group, p. 62.

⁹ Statistics Canada. [Table 14-10-0353-01 Homeless shelter capacity, bed and shelter counts for emergency shelters, transitional housing and domestic violence shelters for Canada and provinces, Infrastructure Canada](#). Retrieved March 15, 2023.

¹⁰ Alberta Council of Women's Shelters. [2022 Data Release](#), p. 5.

¹¹ Government of Alberta. [Supporting wage growth in Alberta's social sector](#). Retrieved March 20, 2023.

¹² Alberta Council of Women's Shelters. (2023). [2021-22 ACWS Domestic Violence Shelter Workforce Survey](#), p. 12.

¹³ The Alberta Human Trafficking Task Force. (2021). [The Reading Stone: The Survivor's Lens to Human Trafficking](#), pp. 35-37.

¹⁴ Polaris (2018, October 30). [The Role Domestic Violence Shelters Play in Supporting Human Trafficking Survivors](#). Retrieved March 15, 2023.

¹⁵ [Social Housing Accommodation Regulation 244/1994, s. 3, Schedule A](#)

¹⁶ Government of Alberta. (2021). [Stronger Foundations: Alberta's 10-year strategy to improve and expand affordable housing](#), pp. 15-16.

¹⁷ In November 2022, [Bill 41, Protection from Coerced Debts Incurred in relation to Human Trafficking Act, 2023](#) was introduced into the Legislative Assembly of Ontario and has since passed Second Reading.

¹⁸ The Alberta Human Trafficking Task Force. (2021). [The Reading Stone: The Survivor's Lens to Human Trafficking](#), p. 17.

¹⁹ Statistics Canada (2022). [Census Profile. 2021 Census of Population. Statistics Canada Catalogue no. 98-316-X2021001](#). Ottawa. Retrieved March 20, 2023.

²⁰ Between October 2021 and 2022, the average market rents increased by 6% across the province while vacancy rates decreased by 44%. [Canadian Mortgage and Housing Corporation 2022 Rental Market Report](#).

²¹ Government of Alberta. (2021). [Stronger Foundations: Alberta's 10-year strategy to improve and expand affordable housing](#), p. 9.

²² Ibid, p. 9.

²³ Young, Rebecca. (2023). [Canadian Housing Affordability Hurts: A doubling of social housing stock could help those in greatest need](#). Scotiabank.