



The Centre

Canadian Centre to
End Human Trafficking.

Attainable Housing: Preventing Human Trafficking & Supporting Survivors

Written submission to the Government of Ontario

Dear Minister:

The Canadian Centre to End Human Trafficking is a national charity dedicated to ending all types of human trafficking in Canada. The Centre works with diverse stakeholders, including survivor leaders, governments, businesses, and service providers to advance best practices and eliminate duplicate efforts across Canada. In 2019, The Centre launched the Canadian Human Trafficking Hotline, providing a free, confidential, multilingual service, operating 24/7 to connect victims and survivors, Canada-wide, with a variety of services and supports.

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 or enter another exploitative relationship if permanent and safe housing is not available.

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, 65% (1,976) of which were from Ontario. Shelter and housing supports for victims and survivors were the most requested referrals on those signals in the province as well as nationwide.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 Government of Ontario to:**

1. Ensure the province's Human Trafficking Lived Experience Roundtable includes survivors' voices, experiences, and insights into legislation and policy decisions related to the housing and shelter system.

2. Ensure that Ontario's Anti-Human Trafficking Coordination Office and the Ministry of Municipal Affairs and Housing (MMAH) work together to apply a human trafficking lens to all housing and homelessness programming.
3. Adequately fund the operation of housing dedicated to human trafficking survivors, 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 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 shelter and transitional housing agencies and establish multi-year allocations. This funding should be used to cover more human trafficking-specific beds in existing buildings, ensure the sustainability and retention of staff, and provide trauma-informed support to survivors that transition through various housing options.
5. Mandate and fund annual anti-human trafficking training for shelter and transitional housing providers to help identify the signs of trafficking, support victims, and prevent human trafficking.
6. Ensure shelter and housing processes, procedures, and eligibility requirements are flexible enough to meet the needs of human trafficking victims/survivors.
7. Address the barriers that human trafficking survivors face when applying for Special Provincial Priority (SPP) status for social and affordable housing by introducing legislation that expands the three-month eligibility criteria and simplifies the verification process.
8. Prioritize financial security for survivors by passing *Bill 41, Protection from Coerced Debts Incurred in Relation to Human Trafficking Act, 2023* and invest in financial literacy programs that reintroduce survivors to sound money management practices.
9. Increase Ontario's social and affordable housing stock to make safe and secure housing more accessible.

We believe that implementing these 9 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 life – at your earliest convenience. We will follow up with your office to find a time to meet.

Sincerely,

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

Julia Drydyk

Executive Director

The Canadian Centre to End Human Trafficking

Detailed Recommendations

- 1. Ensure that the province's Human Trafficking Lived Experience Roundtable includes survivors' voices, experiences, and insights into legislation and policy decisions related to the housing and shelter system.**

Impacted ministries: MCCSS

In 2017, the Province established a Human Trafficking Lived Experience Roundtable to incorporate the voices and perspectives of trafficked persons in implementing its anti-human trafficking strategy. The Government of Ontario should continue to prioritize providing human trafficking victims and survivors a platform to offer ongoing advice, including recommendations on how to improve the safety, adequacy, and availability of housing. Funding must be set aside to sufficiently compensate members of this committee and recognize their invaluable contribution to anti-trafficking work.

- 2. Ensure that Ontario's Anti-Human Trafficking Coordination Office and the Ministry of Municipal Affairs and Housing (MMAH) should work closely to apply a human trafficking lens to all housing and homelessness programming.**

Impacted Ministries: MCCSS and MMAH

The Ontario Anti-Human Trafficking Coordination Office is responsible for implementing the province's anti-human trafficking strategy, a whole-of-government action plan that incorporates activities across ministries.⁴ To date, this has not included MMAH. However, because shelter and housing are such vital components in supporting victims/survivors, this ministry should be involved in anti-human trafficking work. More specifically, the Coordination Office and MMAH 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 Labour, Immigration, Training, and Skills Development. Increase protections for workers in the agricultural sector by removing the provision that exempts employer-provided housing from the *Residential Tenancies Act* (RTA, 2006, s. 5(b, h, i, and j)).

3. Adequately fund the operation of housing dedicated to human trafficking survivors, 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 marginalized populations that are particularly vulnerable to trafficking, including LGBTQ2S+ adults and youth, Indigenous peoples, migrant workers, and people of colour.

Impacted ministries: MMAH, MCCSS, Ministry of Finance, Treasury Board Secretariat

More housing options for victims/survivors are required and should be barrier-free, flexible, and safe. Accompanying supports should be trauma-informed and culturally relevant to reflect the diversity of victims/survivors. This housing should be equipped to support the needs of populations particularly vulnerable to trafficking, including LGBTQ2S+ adults and youth, Indigenous peoples, and migrant workers.

Human trafficking victims/survivors have unique needs that often cannot be met at shelters designed for people experiencing homelessness or intimate partner violence, as their trauma often involves additional comorbidities.⁵ 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 working in the sex industry.⁷ 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

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 marginalized population groups.

- 4. Increase funding for emergency shelter and transitional housing agencies and establish multi-year allocations. This funding should be used to pay for more human trafficking-specific beds in existing buildings, ensure the sustainability and retention of staff, and provide trauma-informed support to survivors that transition through various housing options.**

Impacted ministries: MMAH, MCCSS, Ministry of Finance, Treasury Board Secretariat

- 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, Ontario's shelter capacity consisted of 6,793 emergency (homeless) shelter beds, 2,764 transitional housing beds, and 2,896 domestic violence shelter beds.⁹ Unfortunately, the existing supply is not able to meet increasing demand. In the domestic violence sector, for example, shelters routinely accommodate people beyond the maximum capacity for which they are funded.¹⁰ With the system already in crisis, very few spaces are presently reserved for human trafficking survivors who face unique challenges.
- b) Commit to multi-year funding allocations, indexed to inflation, for shelter and housing agencies, and annualize in-year investments such as the Transitional and Housing Support Program into core operating budgets.** Low staffing levels and relatively low pay have created high turnover, burnout and additional strains on agency capacity. Provincial funding for women's shelters, for example, is based on a single-staff model, meaning that just one staff is required during shifts. This reduces their overall ability to support the needs of residents. While the 2023 budget committed additional funding for homelessness programs and supportive housing,¹¹ this is not the case for the shelters and transition houses supporting survivors of domestic violence and other forms of gender-based violence.
- c) Establish a designated case worker 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. One of the biggest barriers cited during the Centre's research on Ontario's shelter and housing system is the lack of support continuity for those transitioning between housing options (e.g. from shelter to transitional to permanent housing). Investing in case workers would help survivors navigate the province's complex shelter and housing system.

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

Impacted ministries: MMAH and MCCSS

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 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.¹² Delivering trauma-informed, culturally-responsive and multi-sectoral training is a priority under Ontario's anti-human trafficking strategy.¹³ This training should include increasing the capacity of shelter and housing operators to identify and support victims/survivors and prevent trafficking from taking place within shelters.

6. Ensure shelter and housing processes, procedures, and eligibility requirements are flexible enough to meet the needs of human trafficking victims/survivors.

Impacted ministries: MMAH and MCCSS

Services, processes, and eligibility requirements are inconsistent across shelters in the domestic violence and homelessness-serving sectors. For example, some agencies continue to restrict out-of-region clients from their services, require police reports to access gender-based violence beds, and impose behavioural requirements as a condition of stay. This makes it difficult for victims/survivors to navigate these options and can prevent them from accessing shelters and transitional housing programs in the first place. Building strong, collaborative, and trusting relationships between domestic violence and homelessness-serving agencies should be prioritized by the Government of

Ontario. Additionally, shelter standards¹⁴ should be consistent across jurisdictions and sectors and allow for flexibility when supporting human trafficking victims/survivors.

7. Address the barriers human trafficking survivors face when applying for Special Priority Policy (SPP) status for social and affordable housing by expanding the three-month eligibility criteria and simplifying the verification process.

Impacted ministries: MMAH

Since 2018, the province's social and affordable housing system has included a legislative requirement through the *Housing Services Act, 2011*, to prioritize applicants for rent-geared-to-income (RGI) housing if they are survivors of human trafficking.¹⁵ Although the inclusion of trafficking survivors is commendable, regulation requirements and application restrictions continue to create barriers for these individuals when seeking to access RGI units.

- a) Amend the three-month time period requirement from O. Reg. 367/11 Section 54.1(2) and expand it to 36 months:** Under Ontario legislation, eligibility for SPP status requires that applicants must currently be experiencing trafficking or have left their situation within the previous three months. These requirements are not practical. Victims/survivors are more likely to become aware of these stipulations after they are no longer eligible for SPP status (i.e. when they have been out of their trafficking situation for more than three months). Further, many survivors do not have access to supports that can help them navigate the system during their trafficking situation or immediately afterwards. Although the legislation allows for extenuating circumstances to extend the time period, Service Managers apply it differently. For consistency and in the best interest of survivors, therefore, The Centre recommends expanding the timeframe to, at minimum, 36 months.
- b) Simplify the process to verify that trafficking has taken place.** A third-party professional is required to provide verification that human trafficking has taken place by submitting information about the applicant's experience. Ontario regulations (HSA, O. Reg. 58.1(6)) list 15 professionals who can provide verification. In many cases, this requires applicants to share intimate details of their trafficking situation with those who manage social housing waitlists across the province. The Centre maintains that this is an unnecessary step and recommends simplifying the verification process by limiting the information

required to that which confirms SPP eligibility (e.g., when the trafficking began and ended and continued safety concerns). By their very nature, a verifier is a trusted professional with experience in confirming that human trafficking has taken place. Confirmation from a verifier should, therefore, suffice to meet eligibility requirements. This will reduce the administrative burden on applicants and those who support them.

These changes will ensure that more survivors can be prioritized for units more quickly. Resources also need to be allocated towards housing providers to develop processes and procedures to support this change.

8. Prioritize financial security for survivors by passing *Bill 41, Protection from Coerced Debts Incurred in Relation to Human Trafficking Act, 2023* and invest in financial literacy programs that reintroduce survivors to sound money management practices.

The Centre calls on the Government of Ontario to expedite the passing of *Bill 41, Protection from Coerced Debts Incurred in Relation to Human Trafficking Act, 2023*, which was originally introduced in 2022 as Bill 99. In addition, The Centre calls on the Government of Ontario to invest in financial literacy programs that reintroduce survivors to banking systems and encourage financial self-sufficiency.

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).

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

Impacted ministries: MMAH

Approximately 14% of renter households in Ontario are in some form of subsidized housing.¹⁶ It is a vital component of housing infrastructure that, in light of the rising cost of rental housing in the province,¹⁷ is one of the few options available to people living with low incomes. The slow and unpredictable pace of construction starts and overly complicated planning and development frameworks, along with complex and time-consuming eligibility and application requirements for housing programs, have made social/affordable housing difficult to access.

In 2019, the Government of Ontario introduced its Community Housing Renewal Strategy (CHRS) with the goal of transforming the current "fragmented and inefficient system into one that is more streamlined, sustainable, and ready to help people who need it most."¹⁸ This strategy includes 1) a number of funding streams to repair and rejuvenate existing social housing stock and 2) measures to support housing providers in the development of new units through rent subsidies and construction.¹⁹ While The Centre applauds this commitment, the province has not provided overall targets of how many social and community housing units these measures will create. To bring Canada in line with the OECD's average, Ontario needs to double its social housing stock.²⁰ This ambitious investment would address the growing needs of Ontarians generally and human trafficking survivors specifically.

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 Government of Ontario. [Ontario's anti-human trafficking strategy 2020-2025](#). Retrieved May 8, 2023.
- ⁵ The Canadian Centre to End Human Trafficking. (2021). [Human Trafficking Corridors in Canada](#), p. 44; Hossain, M., Zimmerman, C., Abas, M., Light, M., & Watts, C. (2010); [The Relationship of Trauma to Mental Disorders Among Trafficked and Sexually Exploited Girls and Women](#). *American Journal of Public Health*, 100(12), pp. 2442-2449.
- 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 April 21, 2023.
- ¹⁰ Women's Shelters Canada. (2019). [A National Profile of VAW Shelters and Transition Houses](#), p. 25.
- ¹¹ Government of Ontario. (2023). [Building a Strong Ontario: 2023 Ontario Budget](#), p. 84.
- ¹² Polaris (2018, October 30). [The Role Domestic Violence Shelters Play in Supporting Human Trafficking Survivors](#). Retrieved March 15, 2023.
- ¹³ Government of Ontario. [Ontario's anti-human trafficking strategy 2020-2025](#). Retrieved May 8, 2023. Training and education fall under the strategy's first pillar: raising awareness of the issue.
- ¹⁴ Examples of shelter standards in both domestic violence and homelessness-serving agencies: [Ontario Association of Interval & Transition Homes](#) and the [City of Toronto](#). Retrieved May 8, 2023.
- ¹⁵ Government of Ontario. [Housing Services Act, 2011, Ontario Regulation 367/11, sections 54-58.1](#). The requirement to prioritize survivors of domestic violence was introduced with the legislation in 2011. Survivors of human trafficking were included through a legislative amendment in 2017 and came into force on January 1, 2018.
- ¹⁶ Statistics Canada (2022). [Census Profile. 2021 Census of Population](#). Statistics Canada Catalogue no. 98-316-X2021001. Ottawa. Retrieved May 8, 2023.
- ¹⁷ Between October 2021 and 2022, the average market rents increased by 6% across the province while vacancy rates decreased by 49%. [Canadian Mortgage and Housing Corporation 2022 Rental Market Report](#).
- ¹⁸ Government of Ontario. [Ontario's second Action Plan under the National Housing Strategy \(2022-2023\)](#). Retrieved May 8, 2023.
- ¹⁹ Government of Ontario. [Community Housing Renewal Strategy](#). Retrieved May 8, 2023.
- ²⁰ Young, Rebecca. (2023). [Canadian Housing Affordability Hurts: A doubling of social housing stock could help those in greatest need](#). Scotiabank.