



The Centre

Canadian Centre to
End Human Trafficking.



Attainable Housing: Preventing Human Trafficking & Supporting Survivors

Policy Brief Submitted to the Government of British Columbia

October 2023

October 10, 2023

The Honourable Ravi Kahlon, M.L.A.
Minister of Housing
Legislative Assembly of British Columbia
Victoria, BC V8V 1X4

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. 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 vulnerable to trafficking, helping victims exit their trafficking situation, and creating 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, 222 of which were from British Columbia. Nation-wide, shelter and housing supports for victims and survivors were the most requested referrals on those signals.¹ 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 submission identifies where policy gaps exist across the housing continuum² and where the province can make a difference. In keeping with this, **we are calling on the Government of British Columbia 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 British Columbia Office to Combat Trafficking in Persons (OCTIP) and Ministry of Housing and BC Housing work closely to apply a human trafficking lens to all housing and homelessness programming.
3. Adequately fund the development and 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 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 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 and transitional 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. Pass legislation that forgives survivors of fraudulent debt, including student debt held by governments, incurred during their trafficking situation. Invest in financial literacy programs that reintroduce survivors to banking systems and encourage financial self-sufficiency.
8. Increase British Columbia'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. Additionally, the

Government of British Columbia should honour previous commitments to fund human-trafficking specific accommodations.

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. We will follow up with your office to find a time to meet. Implementing these recommendations will be critical for preventing human trafficking and supporting victims and survivors on their path to recovery.

Yours sincerely,

A handwritten signature in cursive script that reads "Julia Drydyk".

Julia Drydyk

Executive Director

The Canadian Centre to End Human Trafficking

Detailed Recommendations

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

Incorporating the voices and perspectives of trafficked persons was a guiding principle in the development of *BC's Action Plan to Combat Human Trafficking*,³ and their voices should continue to inform the ongoing implementation of the Plan. Whether incorporated into the Office to Combat Trafficking in Persons (OCTIP) 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 British Columbia. This includes 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. Mandate that the British Columbia Office to Combat Trafficking in Persons (OCTIP) work closely with the Ministry of Housing and BC Housing to apply a human trafficking lens to all housing and homelessness programming.

British Columbia established the Office to Combat Trafficking in Persons in 2007. Its mandate is to coordinate the province's response to human trafficking and lead the implementation of *BC's Action Plan to Combat Human Trafficking 2013-2016*. A key priority action in this Plan is to "increase coordination of services to address the unique needs of trafficking persons in BC communities, emphasizing culturally appropriate responses."⁴

Since housing and shelter are included in OCTIP's Service Model⁵ - a collaborative and multi-faceted approach to supporting survivors - the Ministry of Housing and BC Housing should be heavily involved in the OCTIP's work. More specifically, OCTIP and these ministries 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) Work with the Ministry of Labour to ensure that migrant workers can access safe and decent housing options.

3. Adequately fund the development and 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 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 also 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

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. To this end, the government should honour its commitment to fund transitional housing for victims/survivors of exploitation human trafficking. In 2018, the Women's Transition

Housing Fund was announced, a \$734-million investment over 10 years to build 1,500 housing spaces for women and children fleeing violence.⁹ A 10-20 bed facility was one of 12 projects included in the first round of funding.

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, 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, British Columbia's shelter capacity consisted of 2,456 emergency (homeless) shelter beds, 1,017 transitional housing beds, and 1,601 domestic violence shelter beds.¹⁰ Unfortunately, the existing supply is not able to meet increasing demand. For example, in the domestic violence sector alone, 201 people were waiting for services or turned away from shelter and transitional housing over one 24-hour period, primarily due to a lack of available beds.¹¹
- 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. It is not uncommon, for example, for domestic violence shelters and transition houses to be operating with just one staff for up to 24 hours at a time, which reduces their overall ability to support the needs of residents.¹² While the 2023 budget has allocated additional operational funding to existing homeless shelters and transitional housing programs,¹³ 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 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 OCTIP's Service Model and the recommendation to support communities across the province with implementing it.¹⁴

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.

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.¹⁵ Education and training are some of OCTIP's primary responsibilities¹⁶ and should be extended to shelter and housing operators to increase their capacity to identify and support victims/survivors and prevent instances of trafficking from taking place within shelters.

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 includes a process for prioritizing applicants based on the following extenuating circumstances:

- They are experiencing homelessness;
- They are fleeing domestic violence or abuse; or
- They have a serious health condition that is affected by their current housing.

This process is optional; housing providers do not need to use it and may, in fact, have their own prioritization criteria for selecting tenants.¹⁷ Although victims and survivors most certainly fall under all three of these circumstances, The Centre recommends adding human trafficking as a separate consideration for prioritization. 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 providers to develop processes and procedures to support this change.

7. Pass legislation that forgives survivors of fraudulent debt, including student debt held by governments, incurred during their trafficking situation. 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).

The Centre calls on the Government of British Columbia to follow other Canadian jurisdictions¹⁸ by introducing and passing legislation to forgive fraudulent debt incurred during a trafficking situation. This recommendation aligns with Priority Action #5 in *BC's Action Plan to Combat Human Trafficking*, which calls for increasing policy and legislative responses to human trafficking in the province.¹⁹ In addition, The Centre calls on the Government of British Columbia to invest in financial literacy programs that reintroduce survivors to banking systems and encourage financial self-sufficiency.

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

Approximately 11% of renter households in British Columbia are in some form of subsidized housing.²⁰ It is a vital component of housing infrastructure that, in light of the rising cost of rental housing in the province,²¹ 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 the 2018 plan for housing affordability, the Government of British Columbia committed to delivering 114,000 affordable homes over 10 years.²² In 2023, the government released an updated plan to create additional subsidized housing through various funds and partnerships.²³ While The Centre applauds this commitment, the province needs to double its social housing stock to bring it in line with the OECD's

average. This ambitious investment would address the growing needs of British Columbians generally, and human trafficking survivors specifically.²⁴

Endnotes

¹ 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.

² Adapted from the [Canada Mortgage and Housing Corporation](#). Retrieved November 17, 2022.

³ Ibid, p. 5.

⁴ Government of British Columbia. (2013). [BC's Action Plan to Combat Human Trafficking 2013-2016](#), p. 11.

⁵ Ibid, p. 20.

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 Government of British Columbia Press Release (October 25, 2018). [New homes on the way for women and children fleeing violence](#). Retrieved October 3, 2023.

¹⁰ 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.

¹¹ BC Society of Transition Housing. (2023). [2022 BCSTH 24 Hour Census Report: A One-Day Snapshot of the Transition Housing and Support Programs in BC](#), p. 3.

¹² Ibid, p. 13.

¹³ Government of British Columbia. (2023). [Budget 2023: Stronger BC for Everyone](#), p. 13.

¹⁴ Government of British Columbia. (2013). [BC's Action Plan to Combat Human Trafficking 2013-2016](#), p. 11.

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

¹⁶ Government of British Columbia. (2013). [BC's Action Plan to Combat Human Trafficking 2013-2016](#), pp. 10-11; specifically, priority actions 2 and 3.

¹⁷ BC Housing. [Subsidized Housing](#). Retrieved April 27, 2023.

¹⁸ 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.

¹⁹ Government of British Columbia. (2013). [BC's Action Plan to Combat Human Trafficking 2013-2016](#), p. 12.

²⁰ Statistics Canada (2022). [Census Profile. 2021 Census of Population. Statistics Canada Catalogue no. 98-316-X2021001](#). Ottawa. Retrieved April 21, 2023.

²¹ Between October 2021 and 2022, the average market rents increased by 8% across the province while vacancy rates decreased by 7%. [Canadian Mortgage and Housing Corporation 2022 Rental Market Report](#).

²² Government of British Columbia. (2018). [Homes for B.C. A 30-Point Plan for Housing Affordability in British Columbia](#), p. 18.

²³ Government of British Columbia. (2023). [Homes for People: An action plan to meet the challenges of today and deliver more homes for people, faster](#), p. 22.

²⁴ Young, Rebecca. (2023). [Canadian Housing Affordability Hurts: A doubling of social housing stock could help those in greatest need](#). Scotiabank.