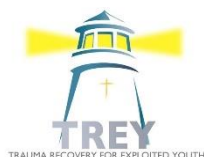




# Attainable Housing: Preventing Human Trafficking & Supporting Survivors

Written submission to the Government of Nova Scotia



Dear Minister,

We represent organizations that support human trafficking survivors in Nova Scotia, the province with the highest rate of police-reported human trafficking incidents per capita in the country.<sup>1</sup> Our trained staff help vulnerable individuals avoid harm, exit their trafficking situations, and gain access to support 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.

Growing evidence demonstrates strong linkages between 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 seek out other unsafe and exploitative situations.

A range of 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.<sup>2</sup> 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 and shelter system and where the province can make a difference. **We are calling on the Government of Nova Scotia to:**

1. Create a multi-year anti-human trafficking strategy that includes provincial coordinating bodies - a Nova Scotia Office to Combat Trafficking in Persons and a Survivors' Advisory Committee - to oversee and lead its implementation.
2. Apply an anti-human trafficking lens to current and future housing and homelessness programming.

3. Increase funding for the operation of housing dedicated to human trafficking victims and 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 historically marginalized populations that are particularly vulnerable to trafficking, including 2SLGBTQ+ adults and youth, Indigenous peoples, migrant workers, and people of colour.
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.
5. Increase the capacity of the shelter and housing system to identify the signs of trafficking, support victims/survivors, and prevent human trafficking through ongoing on-site training and post-secondary education opportunities.
6. Improve landlord accountability by creating a proactive registration and inspection process that takes some of the onus off of tenants to file complaints.
7. Rapidly increase Nova Scotia's non-market (public, social/community, and affordable) housing stock to make safe and secure housing more accessible.

These recommendations are based on consultations with frontline service providers, survivors of human trafficking, and municipalities. Many of the recommendations are equally applicable for survivors of other traumas such as intimate partner violence and sexual exploitation. We believe that implementing these 7 recommendations is critical to preventing human trafficking and supporting survivors on their path to recovery.

Thank you for taking the time to review our policy brief. 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**

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### **1. Create a multi-year anti-human trafficking strategy that includes provincial coordinating bodies - a Nova Scotia Office to Combat Trafficking in Persons and a Survivors' Advisory Committee - to oversee and lead its implementation.**

Human trafficking is complex and spans different industries and policy areas. Victims and survivors often require support from across the public service, including in: housing, education, healthcare, mental health and addictions, immigration, employment, social assistance, law enforcement, and the criminal justice system. As a result, a whole-of-government approach is required to disrupt trafficking and support survivors.

Similar to other Canadian jurisdictions,<sup>3</sup> the Government of Nova Scotia should create a comprehensive, holistic, and collaborative framework that includes the following components:

- a) **A dedicated strategy** to guide the work necessary to prevent and disrupt human trafficking in the province. This strategy should take a human rights-based approach, incorporate the breadth of policy issues impacting victims and survivors, concentrate resources across government, and be evaluated at regular intervals. A dedicated and coordinated strategy will ensure that the government's approach to such a complex issue will not be ad hoc or siloed.
- b) **A Nova Scotia Office to Combat Trafficking in Persons** to coordinate the implementation of the strategy and provide backbone support for anti-trafficking initiatives and programs. This office could build upon and complement the valuable work of the Trafficking and Exploitation Services System (TESS).<sup>4</sup>
- c) **A Survivors' Advisory Committee** to incorporate survivors' lived experiences, voices, and insights into legislation, policy decisions, and program development. Funding must be set aside to adequately compensate members of this committee and recognize their invaluable contribution to anti-trafficking work.

### **2. Apply an anti-human trafficking lens to housing and homelessness programming in the province.**

Since housing is a vital component for preventing trafficking and supporting survivors, the Ministry of Municipal Affairs and Housing and the Nova Scotia Provincial Housing Agency should play a role in anti-trafficking efforts.

To start, a thorough review of current programming should be conducted to identify the processes that deter or prevent human trafficking survivors from accessing emergency shelters, transitional housing, and permanent subsidized housing options. This includes application, eligibility, intake, and program requirements such as types of documentation, 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. These agencies should immediately respond to this review by addressing the barriers and challenges identified.

**3. Increase funding for the operation of housing dedicated to human trafficking victims and 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 historically marginalized populations that are particularly vulnerable to trafficking, including 2SLGBTQ+ 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, limitations on accessing phones, the internet or social media, restrictions on substance use, and requirements to do chores - may mimic their trafficking experiences and unintentionally harm survivors in their recovery.<sup>5</sup>

Addressing the elevated risks to safety that exist for victims/survivors may also not be met by many housing and shelter options. Robust security protocols, especially in domestic violence shelters, can help to mitigate safety risks for residents. However, they are not always enough to deter traffickers from looking for survivors who have escaped or from recruiting new victims within the shelter system, including through peer recruitment.<sup>6</sup>

More housing options for victims/survivors are required and should be barrier-free, flexible, safe, and spread across geographic areas. This includes developing models with relevant stakeholders (e.g. housing/shelter providers, healthcare providers) that offer dedicated spaces for those who actively use substances in a way that is safe for everyone.

Overall, accompanying supports for human-trafficking specific housing need to be trauma-informed and culturally relevant to take into consideration the unique needs of marginalized population groups. Survivor autonomy and the ability to make choices about their own readiness to participate in programming should be acknowledged and accommodated.

**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 2022, Nova Scotia's shelter capacity consisted of 295 emergency (homeless) shelter beds, 286 transitional housing beds, and 285 domestic violence shelter beds.<sup>7</sup> A common theme in our consultations with shelter providers was their high turn-away rates, extended lengths of stay, and the growing use of waiting lists or call-back practices. While steps have been taken to create more spaces,<sup>8</sup> the existing supply is not able to meet increasing demand. Without immediate access to emergency or transitional shelters, victims/survivors may have no option but to stay with their trafficker.
- b) Commit to multi-year funding allocations, indexed to inflation, to shelter and housing agencies. Grant or project-based funding contributes to the instability of the sector, while low staffing levels and relatively low pay leading to high turnover and burnout cause additional strains on shelter capacity.<sup>9</sup> The 2024 budget has allocated an additional \$7.1 million in permanent funding for domestic violence transition houses. It also includes an undisclosed amount for 'operational funding for shelter service providers' in the \$84.6 million allocated for homelessness response initiatives.<sup>10</sup> However, if these amounts merely maintain current operating levels, staffing and workload challenges in the sector will persist, and support for marginalized populations will be impacted.
- 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.

- d)** Include funding to address the transportation challenges faced by shelter and housing services in rural Nova Scotia. Funding for social services is not always prioritized in 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. Increase the capacity of the shelter and housing system to identify the signs of trafficking, support victims/survivors, and prevent human trafficking through ongoing on-site training and post-secondary education opportunities.**

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, staff may not be equipped to support the unique needs of those impacted by trafficking. In fact, certain program components or requirements as well as misunderstandings or assumptions about trafficking in general may unintentionally harm them. 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 should be done by:

- a) Mandating and funding annual anti-trafficking training** for shelter, transitional, and supportive housing providers to address the gap in knowledge of human trafficking. This training needs to be ongoing and trauma-informed so as not to revictimize survivors.
- b) Incorporating anti-trafficking training into human services programs in post-secondary institutions** to ensure graduates entering the workforce have a foundational understanding of the issue. This could be done by adding anti-



trafficking components to existing course curriculum or introducing courses dedicated to human trafficking.

## **6. Improve landlord accountability by creating a proactive registration and inspection process that takes some of the onus off of tenants to file complaints.**

Along with the high cost and low availability of market housing, survivors and service providers frequently mentioned the poor quality of units during our consultations. More troubling, we heard multiple stories of landlords exploiting vulnerable tenants (e.g. those on income assistance, those experiencing gender-based violence) by demanding sexual favours in exchange for rent or repairs. This undoubtedly represents a very small percentage of landlords, and while there are mechanisms in place address such issues (e.g. Residential Tenancies Program, Human Rights Commission, police and legal services), they are reactive and complaint based. The stakeholders we spoke to made it clear that many tenants, especially those already marginalized and mistrustful of current systems, would not go through such processes. This is especially the case when there is a risk of further harm, including harassment, discrimination, and loss of housing. Therefore, implementing proactive accountability measures to better protect tenants from unscrupulous and illegal acts was recommended often. This should be done by developing a residential rental registry that builds on models rolled out at the municipal level.<sup>11</sup> Initially, it could be tied to application requirements for provincial funding for landlords such as the Rooming House Residential and Rental Residential Rehabilitation Assistance programs.<sup>12</sup>

## **7. Rapidly increase Nova Scotia’s non-market (public, social/community, and affordable) housing stock to make safe and secure housing more accessible.**

Approximately 11% of renter households in Nova Scotia are in some form of subsidized housing (about 15,700 households).<sup>13</sup> It is a vital component of housing infrastructure that, in light of the rising cost of rental housing in the province,<sup>14</sup> 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 non-market housing difficult to access.

In the last few years, the Government of Nova Scotia has invested in increasing its supply of non-market housing. The 2021 final report of the Nova Scotia Affordable Housing Commission, the 2022 Provincial Housing Needs Assessment, and the 2023 Five

Year Housing Action Plan all emphasize the need to create more non-market housing infrastructure.<sup>15</sup> The 2024 Budget allocates \$47.1 million investment to increase, repair, and maintain the province's public housing stock, as well as \$52 million to expand programs for affordable housing development.<sup>16</sup> While The Centre applauds this commitment, the province should set a target to double its non-market housing stock to help bring Canada in line with the OECD's average. This ambitious investment would address the growing needs of Nova Scotians generally, and human trafficking survivors specifically.<sup>17</sup>

## Endnotes

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<sup>1</sup> Heidinger, L. (2023). [Trafficking in persons in Canada, 2022](#). Juristat Bulletin – Quick Fact, Statistics Canada, p. 5.

<sup>2</sup> 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.

<sup>3</sup> [British Columbia](#), [Alberta](#), and [Ontario](#) all have provincial strategies to combat human trafficking as well dedicated offices to coordinate its anti-trafficking efforts. Ontario has also established a Human Trafficking Lived Experience Roundtable.

<sup>4</sup> [TESS](#) is a collaborative community of practice consisting of 70 agencies across the province that prioritizes awareness, training, mobilization, and community-based responses to the issue of commercial sexual exploitation of children and youth (CSEC). Retrieved May 2, 2024.

<sup>5</sup> Polaris (2018, October 30). [The Role Domestic Violence Shelters Play in Supporting Human Trafficking Survivors](#). Retrieved May 2, 2024.

<sup>6</sup> YWCA Halifax (2021). [A Review of Housing Practices for Victims of Human Trafficking](#), p. 13; 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.

<sup>7</sup> 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 May 2, 2024.

<sup>8</sup> Government of Nova Scotia (2023). [Our Homes, Action for Housing: A Five Year Housing Plan](#). This plan includes investing in the purchase of pallet shelter units and increasing the number of emergency shelter beds across the province (pp. 35-37) These initiatives are part of the \$85.4 million allocated for homelessness response initiatives in the [2024 Budget](#).

<sup>9</sup> Newell-Bain, L. (2022). [Models of Service Delivery in Violence Against Women Organizations Final Report](#). Transition House Association of Nova Scotia. The current single staffing funding structure, increasingly complex and broadened workloads for both frontline and management positions, and growing burnout and compassion fatigue were all identified as significant challenges in the sector.

<sup>10</sup> Government of Nova Scotia (2024). [Budget 2024-25 Building Nova Scotia, Faster: Highlights](#), p. 4.

<sup>11</sup> The Halifax Regional Municipality, for example, passed a by-law in 2023 requiring all property owners to register their rental properties: <https://www.halifax.ca/business/doing-business-halifax/residential-rental-registry>. Retrieved May 3, 2024.

<sup>12</sup> Both programs provide financial assistance to owners/landlords to upgrade their properties: <https://housing.novascotia.ca/programs/housing-programs-landlords>. Retrieved May 3, 2024. These programs could, for example, incorporate the rental registry and other checks and balances (e.g. scheduled regular inspections) into their application processes.

<sup>13</sup> Statistics Canada (2022). [Census Profile, 2021 Census of Population, Statistics Canada Catalogue no. 98-316-X2021001](#). Ottawa. Retrieved May 2, 2024.

<sup>14</sup> Between October 2023 and 2023, the average market rents for all unit sizes increased by 13% across the province while vacancy rates increased by 10%. [Canadian Mortgage and Housing Corporation Rental Market Survey, Nova Scotia, 2023](#). Retrieved May 2, 2024.

<sup>15</sup> Nova Scotia Affordable Housing Commission (2021). [Charting a new course for affordable housing in Nova Scotia](#); Government of Nova Scotia (2022). [Nova Scotia's Provincial Housing Needs Assessment Report](#); Government of Nova Scotia (2023). [Our Homes, Action for Housing: A Five Year Housing Plan](#).

<sup>16</sup> Government of Nova Scotia. (2024). [Budget 2024-25 Building Nova Scotia, Faster: Highlights](#), p. 9.

<sup>17</sup> Young, R. (2023). [Canadian Housing Affordability Hurts: A doubling of social housing stock could help those in greatest need](#). Scotiabank.