



Office for Systemic Justice  
Federation of Sisters of St. Joseph of Canada  
London, ON, N6A 4X3

July 27, 2020

Hon. Jill Dunlop, Associate Minister of Children and Women's Issues  
Hon. Monte McNaughton, Minister of Labour, Training and Skills Development  
MPP Natalia Kusendova

### **Re: Action plan to combat human trafficking**

In March 2020, the Government of Ontario announced an action plan to combat human trafficking. This five-year strategy has promised investments up to \$307 million to raise awareness, protect victims, intervene early, support survivors, and hold offenders accountable.<sup>1</sup> As part of that strategy, the government launched a call for applications allowing community organizations to apply for funding.

While we commend the government's commitment to address human trafficking in the province, particularly its commitment to fund peer and survivor led work, we are deeply concerned that the initiative focuses exclusively on child and youth sexual exploitation. Other trafficked persons, such as adults who are sexually exploited as well as persons subjected to other forms of labour trafficking or forced marriage, are overlooked entirely. To acknowledge only some survivors, or some types of human trafficking, creates an unjust competition for resources and divides survivors as deserving and undeserving. Such an approach conflicts with a human rights framework which should be at the core of any anti-human trafficking strategy.

Human trafficking is a complex issue which results in grave human rights violations. It can be tackled effectively only by addressing the social, economic, and cultural factors which create vulnerabilities to trafficking. Root causes such as social exclusion, homelessness, poverty, gender inequality, lack of education, lack of good job opportunities, racism and colonialism need to be addressed at the systemic level. A comprehensive action plan for the prevention of human trafficking must attend to these issues.

Awareness-raising initiatives are only a first step. To overcome exploitation, it is critical to ensure that all people in Ontario have access to sufficient levels of social assistance, comprehensive health care including mental health services, gender parity in wages, and good jobs which pay a living wage. All people need easy access to social protections for all people, regardless of immigration status.

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<sup>1</sup> <https://news.ontario.ca/opo/en/2020/03/ontarios-new-anti-human-trafficking-strategy.html>

Furthermore, while the government has made important investments in skills-training, housing supports and counselling targeted to youth, to our knowledge, there is no funding allocated to community organizations working to prevent human trafficking through community-building and educational efforts which address cultural root causes of human trafficking. This is a missed opportunity given that there are existing grassroots organizations with a proven success record in addressing gender inequality, systemic racism, colonialism, ableism, rape culture and more.

The Federation of the Sisters of St. Joseph has consulted with partner organizations from networks across Ontario to highlight concerns about the current multi-year anti-human trafficking strategy. While it is important to provide services to respond to people who have been in situations of human trafficking, it is clear that anything less than a human rights approach, focused on transforming the social, economic and cultures structures which contribute to human trafficking, will fail to address adequately human trafficking in the province.

We recommend the Government of Ontario include the following points in the strategy:

- Address the root causes of human trafficking by creating easy access to sufficient levels of social assistance, comprehensive health care including mental health services, gender parity in wages, and good jobs which pay a living wage. All persons need easy access to social protections, regardless of immigration status.
- Prioritize funding for educational programs (led by grassroots community organizations) which are focused on the preventing human trafficking by advancing equity and addressing root causes such as gender inequality, systemic racism, colonialism, ableism, rape culture and more.
- Raise awareness of current forms of labour trafficking in Ontario, highlighting aspects of structural racism and economic exploitation.
- Increase labour inspections for the protection of all workers in Ontario, especially migrant workers.
- License and regulate contractors and recruiters of migrant workers.

Sincerely,



Sue Wilson, CSJ  
Office for Systemic Justice  
Federation of Sisters of St. Joseph of Canada