



Ontario Association of
Children's Aid Societies

LETTER TO THE MINISTER OF CHILDREN, COMMUNITY AND SOCIAL SERVICES

Review of Ontario's *2020– 2025 Anti-Human Trafficking Strategy*

AUGUST 7, 2024

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Hon. Michael Parsa
Minister of Children, Community and Social Services
Ministry of Children, Community and Social Services
7th Floor, 438 University Avenue
Toronto, ON M5G 2K8

RE: Review of Ontario's 2020–2025 Anti-Human Trafficking Strategy

Dear Minister Michael Parsa,

On behalf of the Ontario Association of Children's Aid Societies (OACAS) and our members, I am writing with respect to the review of [Ontario's 2020–2025 Anti-Human Trafficking Strategy](#) (the Strategy).

OACAS is a provincial membership organization representing 47 of Ontario's 50 mandated children's aid societies and Indigenous Child and Family Well-Being Agencies (child welfare agencies), as well as 2 pre-mandated Indigenous Child and Family Well-Being Agencies. We support members by providing practice tools, educational and training opportunities, as well as communication and advocacy supports to help bring positive change to the Ontario child welfare system and improve outcomes for children, youth, and families.

Approximately two-thirds of police-reported human trafficking cases in Canada take place in Ontario. The average age of recruitment in Ontario is 13 and most cases involve sexual exploitation, which can also be referred to as sex trafficking. While human and/or sex trafficking can happen to anyone at any time, research has shown that traffickers target vulnerable individuals.

A myriad of factors can contribute to a person's vulnerability. For instance, young age, poverty, homelessness, physical or developmental disability, mental health challenges and addictions, or a history of childhood or sexual abuse and/or trauma. Systemic colonialism and racism, among other systems of power and privilege, also contribute to vulnerability and elevate risk for some communities. Though men and boys can be targeted, Indigenous women and girls, Black and racialized women and girls, and members of the 2SLGBTQ+ community are particularly vulnerable.

Notably, research has shown that some young people who have experienced human and/or sex trafficking have also been involved with youth-serving systems, including child welfare. The risk is sometimes related to the lived experiences of children prior to interacting with the child welfare system (i.e., physical, sexual, emotional abuse or abuse through neglect). However, it is also linked to realities that can occur within the child welfare system. For instance, housing instability, disruptions in education, continued experiences of maltreatment, feelings of isolation or a lack of belonging, and weakened or ruptured relationships with kin, culture, and community.

OACAS and our members welcome the opportunity to offer comments on the Strategy. As the Ministry of Children, Community and Social Services (MCCSS or the Ministry) considers next steps, there are key considerations we would like to bring to your attention.

1: Education, Early Intervention & Prevention

Raising awareness about human and/or sex trafficking is an essential part of preventing trafficking before it occurs and making early interventions in circumstances when there are signs a person may be at risk. We commend the province for prioritizing education and training opportunities for direct service staff; we encourage Ontario to continue to build capacity among direct service staff supporting children and youth, so they have a strong understanding of what human and/or sex trafficking is, signs of risk, and what to do. We also appreciate Ontario's efforts to improve awareness of human and/or sex trafficking among children, youth, and their caregivers through the Strategy.

As Ontario looks ahead, we encourage the province to build on their efforts to raise awareness among children, youth, and their caregivers by ensuring public education materials are more visible and/or readily available in spaces frequented by young people. This must include online spaces like Facebook, X, Instagram, and TikTok. Research has shown that traffickers are using online spaces more and more to recruit children and youth. Public education materials must be integrated into online spaces where possible to ensure young people are aware of how to remain safe online.

We urge Ontario to continue to integrate human and/or trafficking into human development and sexual health curriculum across grade levels in an age-appropriate manner. Young people must learn about what human and/or sex trafficking is, signs of risk, and where to turn for help. Further, they must be aware of the specific tactics that traffickers deploy to recruit and entrap a person, which includes efforts to fill a need for connection, love, and/or belonging by acting as a caring partner. Alongside students, schools should also provide caregivers with information regarding human and/or sex trafficking and available resources, so they are well equipped to have difficult but vital conversations with their loved ones.

2: Integrated Service Delivery

Effectively combatting human and/or sex trafficking and supporting survivors requires high-quality, culturally relevant, trauma-informed supports and services that wraparound at-risk and exploited children and youth. Alongside our members, we are grateful that Ontario made this a key part of the Strategy. We hope that the province will continue to fund multi-disciplinary initiatives that ensure children and youth have access to integrated services that will meet their unique needs.

We strongly recommend that Ontario continue to invest in Children at Risk of Exploitation Units (CARE) Units to scale and spread this multi-disciplinary model across the province. Members shared with OACAS that CARE Units have had a positive impact on their capacity to provide early intervention, prevention, and child protection services to children and youth who have experienced sex trafficking. However, there are only six CARE Units in Ontario; we urge the government to make targeted investments to bolster the capacity of existing CARE Units to meet program demands and replicate the model in other regions of the province.

Additionally, we suggest that the Ontario government enhance the youth-in-transition worker program by exploring opportunities to work in partnership with the Ministry of Education. The province expanded the program to provide human trafficking supports to youth in care and leaving the care of a child welfare agency, and the impact of this vital program could be amplified by ensuring youth-in-transition workers partner with teachers and other staff in school who may also be supporting at-risk or exploited children and youth.

Finally, we encourage Ontario to invest in community-based organizations and service providers delivering specialized and trauma-informed care that is grounded in the lived experience of survivors and centres culturally relevant services (including those operating safe, secure treatment spaces). Members have highlighted that organizations and service providers are unable to keep up with the level of need in their communities, leading to delays in access to vital programming that will help survivors heal. Healing and rebuilding can be fragile; it is essential children and youth who have experienced human and/or sex trafficking have timely access to supports that will meet their unique needs when they need them, close to home.

3: Safe Community-Based Placements

Some children and youth who have experienced human and/or sex trafficking have also been involved with child welfare. Again, this is linked to the lived realities that can occur within the child welfare system (i.e., housing instability, disruptions in education, continued experiences of maltreatment, feelings of isolation or a lack of belonging, and weakened or ruptured relationships with kin, culture, and community). Child welfare agencies must have access to safe community-based placements. Sadly, it is increasingly challenging for child welfare agencies to secure such placements.

Agencies are encountering difficulties accessing local out-of-home care settings (i.e., foster, group home, live-in treatment programs). As a result, child welfare agencies are often forced to send children and youth to out-of-home care settings outside of their communities. This is particularly common for agencies in Northern and rural and remote parts of the province serving Indigenous children, youth, and families. This is caused, in part, by inadequate social infrastructure and limited access to alternate caregivers (i.e., foster, kin) in these parts of the province. Members have observed that current and prospective alternate caregivers are grappling with a cost-of-living and housing crisis. For many, they do not have the financial flexibility or physical space to welcome a young person. Additionally, recent legislative and regulatory changes have had an unintended chilling effect on the willingness of family and kin to act as an alternate caregiver.

The pattern of sending children and youth beyond their community is deeply concerning given the challenges it poses for maintaining connections that are vital to their health and well-being, as well as their sense of self and belonging (i.e., kin, culture, community). This places youth in a heightened state of vulnerability and leads to ideal conditions for recruitment and entrapment.

OACAS acknowledges the recent steps Ontario has taken to improve the experiences of children and youth in care who are placed outside of their community through strengthened regulatory requirements concerning inter-agency protocols. Though this will help promote continuity in care, there is a need to address the heightened vulnerability of children and youth receiving out-of-home care as it relates to human and/or sex trafficking.

There is limited research on specific trends or patterns in the recruitment and entrapment of youth receiving licensed out-of-home care (i.e., foster, group, treatment sites, etc.), but members have observed that traffickers seem to target out-of-home care settings. Traffickers perceive these settings as spaces of hyper-vulnerability, where youth have unmet needs and spend time without adequate supervision. We encourage MCCSS and the Ministry of the Solicitor General (MSG) to work in partnership to develop a better understanding of the intersection between out-of-home care and human and/or sex trafficking; this must include getting a clear line of sight on the distribution of reported cases across out-of-home care settings so there is an awareness of acute areas of need.

We strongly urge the Ministry to explore and prioritize early intervention and prevention initiatives tailored to out-of-home care settings. For example, the province could look at creating education and training opportunities for direct service staff and alternate caregivers in such settings. This would help ensure direct service staff and alternate caregivers have opportunities to develop a better understanding of what human and/or sex trafficking is, signs of risk among those in their care, and what to do. Further, we call on Ontario to improve access to adequate, inclusive, identity-affirming out-of-home care settings across the province, so children and youth do not have to leave their communities to receive care.

4: Strong Social Infrastructure

Traffickers may use threats, physical violence, emotional abuse, isolation, and control to manipulate a person. But they also recruit and entrap a person by fulfilling their unmet needs, including the most basic needs like housing or food security. Children, youth, and their caregivers should be able to easily access supports and programming that centre culturally relevant services and the social determinants of health, so they have all the resources they need to thrive. Sadly, this is not the case in communities across the province.

Community-based organizations and service providers delivering vital services have become increasingly scant, siloed, and splintered due to chronic underfunding. Systemic gaps in access to adequate, identity-affirming care is acutely felt by Indigenous, Black, and 2SLGBTQ+ children, youth, and caregivers, including those with complex needs (i.e., social, emotional, developmental, mental health and addictions, etc.). We remind the province that systemic gaps are also compounded by location. Individuals living in Northern and rural and remote parts of Ontario have limited access to affordable housing and service providers delivering programming related to mental health and addictions, food insecurity, houselessness, and more.

We urge Ontario to work across government to strengthen social infrastructure so children, youth, and caregivers can access the right support at the right time, regardless of where they live. Access to adequate, identity-affirming, inclusive care should not be determined by your postal code.

Bolstering social infrastructure will also ensure direct service staff across sectors are well resourced and equipped to work together to prioritize early intervention and prevention. The province must make targeted investments to strengthen Ontario's social safety net so organizations can effectively work together to wrap around the most vulnerable children, youth, and caregivers when they need it most.

Alongside our members, OACAS remains committed to working in partnership with the province to combat human and/or sex trafficking. As Ontario considers the next phase of work to address human and/or sex trafficking, we remind them of the importance of adequate funding. Ontario must provide the necessary resources to bolster anti-human and/or sex trafficking initiatives, programming, supports, and services so they can successfully raise awareness, protect vulnerable individuals, intervene early, and support survivors.

If you have any questions or would like to further discuss, please do not hesitate to reach out. I can be reached at sowoo@oacas.org.

Sincerely,



Solomon Owoo
Interim CEO
OACAS

