Submission to the Standing Senate Committee on Human Rights: Bill S-235, An Act Respecting the National Strategy to Combat Human Trafficking 45th Parliament, 1st session

The Global Alliance Against Traffic in Women (GAATW) Canada bridges community and scholarly expertise to address human trafficking through research, policy change, advocacy, education, and collaborative partnerships.

Over the past year, we have convened a national coalition of Indigenous women, 2SLGBTQIA+ folks, migrant workers[1], sex workers, trafficking survivors, and organizations serving these communities. This submission reflects the perspectives and concerns of some individuals and communities represented in that coalition, as well as those we hear from in our day-to-day work.

Canada's anti-trafficking strategy needs to evolve

Through our engagement with survivors and affected communities, people have consistently identified unmet needs, gaps in support, and responses that do not adequately reflect their lived experiences or circumstances. These perspectives underscore the need for a more substantive examination of Canada's current approach. While Bill S-235 may be intended to strengthen the response to human trafficking, it does not address these underlying concerns. Canada's National Strategy to Combat Human Trafficking requires significant reconsideration.

Toward a More Comprehensive Understanding of Human Trafficking

Bill S-235 reinforces an approach to human trafficking that has not adequately recognized the full range of experiences and circumstances in which trafficking and exploitation occur, with particularly significant gaps in its recognition of labour trafficking. This narrow framing is evident from the outset in the international conventions and protocols referenced in the Bill's preamble; for example, the *Protocol of 2014 to the Forced Labour Convention, 1930,* which Canada ratified in 2019, is not mentioned.

Bill S-235 reproduces a longstanding and problematic feature of Canada's response: its disproportionate focus on trafficking for the purpose of sexual exploitation. As a result, the disproportionate attention and resources devoted to these established, institutional approaches have not translated into the meaningful progress expected after more than a decade of national strategies and action plans.

Pausing to determine effectiveness

Before legislating the measures in Bill S-235, we ask: What evidence do we have that the approaches currently being pursued are working? There seems to be an inclination to do and fund more of the same, driven in part by genuine concern about human trafficking and, perhaps,

[1] The term *migrant worker* is used broadly to include not only workers with employer-specific (closed) work permits, but also international students who work, workers with irregular or no immigration status, and asylum seekers.

by a reluctance to question whether the prevailing approaches are appropriate. The result is a response that too often prioritizes the appearance of action over meaningful progress.

Awareness campaigns and policing have come to define Canada's response

Canada's anti-trafficking response has become heavily characterized by public awareness campaigns and policing. Awareness activities have outpaced the development of meaningful support and services, while an increasingly established 'anti-trafficking awareness industry' continues to attract considerable resources without sufficient accountability for its outcomes.

GAATW Canada's current research on trafficking claims related to the FIFA World Cup in Vancouver offers a particularly relevant example. Although our research is still being analyzed, none of the people interviewed reported observing an increase in trafficking during that time, suggesting that the anticipated surge used to justify awareness and enforcement efforts never materialized. Considerable resources were directed to anti-trafficking awareness campaigns and policing, while basic needs and supports – required year-round by marginalized communities, not only during FIFA – remained unmet. Unfortunately, Bill S-235 repeats these familiar patterns.

Accessible services and supports that are, in and of themselves, preventive are too often overlooked in favour of highly visible activities that are easier to announce and fund. These activities risk becoming a form of 'security theatre'[2]: reassuring the Canadian public that something impactful is being done, even as people in affected communities tell us otherwise.

This raises fundamental questions:

- What purpose does awareness serve when it is misdirected, and people have few meaningful places to turn?
- What purpose does the continued dominance of a law-and-order framework serve when, for many marginalized, at-risk communities, police are not viewed as a source of safety or protection?

We are not suggesting that awareness or policing never play a role. Rather, the problem is the disproportionate investment in these activities, often without adequate consideration of whether they address identified needs or improve people's circumstances. Bill S-235 will legislate this approach.

Approaches to issues such as intimate partner violence and sexual assault have evolved over time, informed by research, emerging best practices, and the experiences and perspectives of survivors. But Bill S-235 will legislate an approach that reinforces existing anti-trafficking strategies without sufficient evidence of their effectiveness, potentially embedding them in Canadian law for years to come. This reflects the exceptionalism that is often attributed to human trafficking, which ultimately impedes meaningful progress. Legislating and institutionalizing these approaches

[2] Watkiss, L. (2026). Anti–Human Trafficking as Security Theatre. In S. Baglay, I. Atak, & V. Kalaydzhieva (Eds.), *Canada's anti-human trafficking measures: Assessing progress over the past twenty years* (pp.48-63). UBC Press.

without first addressing the aforementioned questions risks perpetuating the same shortcomings for years to come.

Addressing root causes

Housing, income security, and safe working and living conditions are not peripheral concerns. Addressing root causes is central to preventing and addressing exploitation. Looking inward, governments must examine their policies and their role in creating the systemic conditions in which trafficking can thrive. Without a robust framework that examines root causes, even well-intentioned efforts risk reinforcing the very systems that create vulnerability.

Recommendations

1. Undertake a substantive review of Canada's National Strategy

The federal government should undertake a substantive review of the National Strategy to Combat Human Trafficking.

This review should:

- Broaden the understanding of human trafficking beyond trafficking for the purpose of sexual exploitation.
- Examine the evidence of effectiveness and the actual outcomes of existing initiatives, including public awareness campaigns and law enforcement activities.
- Identify gaps between the needs expressed by impacted communities and the services and supports currently available.
- Consider the relationship between trafficking, labour exploitation, gender-based violence, poverty, housing insecurity, immigration policy, sex work criminalization, and other structural conditions.
- Meaningfully involve affected communities, including those whose experiences and perspectives have historically been excluded from policy development, such as sex workers and migrant workers.

2. Address the root causes of exploitation, including government policy

If Canada is serious about addressing human trafficking, it must be equally committed to addressing the conditions that enable exploitation.

These conditions are not simply individual circumstances; government policy often shapes or exacerbates them. Immigration restrictions, closed work permits, inadequate labour protections, poverty, housing insecurity, and barriers to accessing essential services can leave people with limited choices and increased exposure to exploitation. Rather than continually asking what additional anti-trafficking initiatives to introduce, governments should also examine which existing policies contribute to the conditions they seek to address.

For example, neither paragraph 3(c)(ii) nor subsection 4(4)(b) explicitly mentions immigration policy or status, despite the well-documented links between immigration rules and the risk of

human trafficking and exploitation. This illustrates a broader concern with legislating specific factors to be addressed in the National Strategy: by defining its scope in legislation, the Bill risks limiting Canada's ability to respond comprehensively to the full range of structural conditions that contribute to trafficking and shape people's experiences of exploitation, access to protection, and recovery.

3. Establish greater fiscal accountability for anti-trafficking funding

It is extraordinarily difficult to determine how much public money has been allocated to anti-trafficking initiatives, let alone assess the collective impact of that investment.[3]

To improve Canada's anti-trafficking responses, there is a need for greater transparency and accountability, including:

- Clearer public reporting of federal anti-trafficking allocations, recipients, activities, and expenditures.
- Greater investment in community-led organizations and initiatives that are often underfunded or excluded from established funding streams.
- Clear reporting on the outcomes and impacts of funded initiatives, rather than relying on participation numbers, campaign reach, or other visibility metrics.

Public funding should not be sustained merely because an activity is widely recognized as anti-trafficking work. It should be justified by evidence of its relevance, effectiveness, proportionality, and contribution to meaningful outcomes.

4. Ensure meaningful and diverse survivor engagement

Survivor engagement within a national strategy must extend beyond a narrow range of perspectives and experiences. A commitment to 'do no harm' requires asking not only who is invited to participate, but also whose experiences are recognized, whose perspectives are valued, and who may feel unsafe or unwelcome in current anti-trafficking policy spaces.

We encourage the federal government to think more deeply about:

- What efforts are being made to include survivors who lack the privilege, resources, or circumstances to speak publicly?
- How are the perspectives of survivors who do not align with prominent anti-trafficking voices being included?

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[3] Wu, A., & Clancey, A. (2026). When everything becomes trafficking: The impacts of federal anti-trafficking funding on NGOs and the public discourse. In S. Baglay, I. Atak, & V. Kalaydzhieva (Eds.), *Canada's anti-human trafficking measures: Assessing progress over the past twenty years* (pp.122-144). UBC Press.

- What efforts are being made to include survivors who do not view sex work as inherently harmful, and who may have experienced harm through criminalization and other anti-trafficking interventions?
- How are survivors of other forms of trafficking, such as forced criminality or labour trafficking, represented?

Meaningful engagement requires more than consulting those who are already visible or comfortable participating in established spaces. It requires making room for disagreement, recognizing diverse experiences, and ensuring that engagement itself does not reproduce the exclusions and harms that policy is meant to address.

Conclusion

Over the past year, our engagement with affected communities has reinforced that the solutions to human trafficking are not necessarily found in doing more of the current approach, which is the premise of this Bill.

These views from affected communities in our coalition are not peripheral. They point directly to the policy conditions, structural inequalities, and unmet needs that Canada must address to make meaningful progress. The answers are there, in the expertise and leadership of communities already doing this work, often with very limited resources.

Canada needs to move beyond its two default responses of awareness campaigns and policing. It needs to question the policies that contribute to exploitation, direct resources toward identified needs, and hold funded initiatives accountable for their outcomes.

Bill S-235 risks further entrenching an approach that has yet to demonstrate that it is meeting the needs of the people it is intended to serve. We urge the Senate to look beyond the appeal of additional legislative measures and consider the more difficult but necessary work of rethinking Canada's overall response to human trafficking.

Submitted by:

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