



Health Providers Against Poverty Submission to the Standing Committee on Justice Policy

Health Providers Against Poverty makes this written submission to the Standing Committee on Justice Policy with respect to Bill 251, Combating Human Trafficking Act, 2021 (henceforward 'Bill 251').

Health Providers Against Poverty [HPAP] is an alliance of health care providers that formed in 2005 to contribute towards the movement for income security and social security for all. Our advocacy raises awareness about **the health impacts of poverty** and engages health workers in movements to end poverty.

HPAP is gravely concerned by the proposed changes to Ontario law outlined in Bill 251. Instead of addressing the root causes of exploitation and human trafficking in Ontario, Bill 251 will **amplify and entrench barriers that prevent sex workers from getting health care, from accessing social supports, and from working more safely**. These barriers will negatively impact the health of patients that HPAP members serve today, and discourage other workers from accessing care, services, and supports they may need for fear of investigation and persecution.

Members of HPAP are unequivocal on our stance: policy actions intended to address human trafficking or exploitation in Ontario that centre law enforcement are counter-productive. **Research has elaborated the central role that poverty, as well as racism, sexism, xenophobia, and other forms of structural oppression, play in fuelling exploitation in our province.** Instead of addressing these structural issues, however, this proposed legislation increases the power of law enforcement agencies which will allow them to surveille, investigate, and detain sex workers by conflating sex work and trafficking.

Regulations in this bill require hotels and other temporary rental accommodations to keep a register of guests to share with police; this breach of privacy will force sex workers into less safe working conditions where they are afforded fewer protections and less capacity to control their surroundings. **As a result, these workers will have less agency to take steps to protect their health and safety.** Moreover, broadening law enforcement powers to investigate sex workers in more settings will further **fuel mistrust towards health workers, social service providers, and**

others who provide points of access to supports and services that facilitate health and wellbeing. Increasing the powers of law enforcement will make Black communities, Indigenous communities, undocumented people, sex workers, and other groups, including people living in poverty, less safe, not more.

Ultimately, Bill 251 promises to exacerbate the marginalization that fuels exploitation in Ontario. We echo the calls from the HIV Legal Network and Butterfly: Asian Migrant Sex Workers Support Network and urge the province to **commit to pursuing a rights-based approach** to addressing exploitation and ending human trafficking in consultation with sex workers and allies.