

**NATIONAL INQUIRY INTO
MISSING AND MURDERED INDIGENOUS WOMEN AND GIRLS**

FINAL WRITTEN SUBMISSIONS OF THE GOVERNMENT OF ONTARIO

**MINISTRY OF THE ATTORNEY
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I. INTRODUCTION

1. Ontario acknowledges the courage and commitment of the families and loved ones of missing and murdered Indigenous women and girls across this country. We acknowledge that more could have been done to meet the needs of Indigenous communities in the face of the ongoing national tragedy of missing and murdered Indigenous women and girls.
2. The prevalence of violence against Indigenous women and girls in Canada is entirely unacceptable. It represents a challenge to how we see ourselves as a country, and our commitment to a society that is safe, fair and just.
3. We have listened carefully to the families and loved ones who have participated in this National Inquiry, and to those who chose to pursue answers outside of this process. With this renewed knowledge and understanding, Ontario recommits itself to ending violence against Indigenous women and girls.
4. These submissions will focus on Ontario's contribution to the evidence heard at the Inquiry. In particular, Ontario provided evidence to the Commission with respect to two areas:
 - **Missing Person Investigations**, as part of the Institutional Hearing on Police Policies and Practices, and
 - **Human Trafficking**, as part of the Institutional and Expert/Knowledge Keeper Hearing on Sexual Exploitation, Human Trafficking and Sexual Violence.
5. This evidence was offered by Ontario in response to the Commission's request that government parties provide evidence concerning "best practices" employed in their respective jurisdictions.

6. In making focussed submissions, Ontario acknowledges that ending the ongoing national tragedy of missing and murdered Indigenous women and girls requires a broad approach by governments and society at large. Ontario looks forward to receiving the Commission's Final Report and Recommendations, and is committed to taking effective action to eliminate and prevent violence against Indigenous women and girls.

II. MISSING PERSON INVESTIGATIONS

7. For decades, the families and loved ones of missing and murdered Indigenous women and girls have raised questions about the quality of police investigations in Ontario and across Canada. These questions, and how to address them, must be a focus of this Inquiry.
8. The Ontario Provincial Police ("OPP"), through the evidence of Chief Superintendent ("Supt.") Mark Pritchard, acknowledged that the concerns expressed by families and loved ones about the quality of missing person investigations are valid.¹ Further, the OPP acknowledged that families have legitimate concerns about whether missing person investigations are affected by racism and stereotyping.²
9. Chief Supt. Pritchard provided evidence with respect to OPP "best practice" concerning missing person investigations, as reflected in OPP policy and training, and explained how compliance with "best practice" reduces the risk that these investigations will be affected by discrimination.³ This section of Ontario's submissions will highlight this evidence to support recommendations directed at improving the quality of missing person investigations, enhancing support for

¹ Part II Volume IX, Evidence of Chief Supt. Mark Pritchard, pp. 210-211, and Exhibit 137, Evidence Overview / Table of Contents of Chief Superintendent Mark Pritchard, OPP, pp.8-10.

² Ibid., Evidence of Chief Supt. Mark Pritchard, p. 242.

³ Ibid.

families and loved ones, and gaining the confidence of Indigenous communities in those investigations.

A. A Strong Policy Framework

10. A comprehensive and prescriptive policy framework is essential to ensuring competent and non-discriminatory missing person investigations.⁴ OPP Police Orders 2.18 in relation to missing persons⁵, along with the Missing Person Manual⁶, details the required investigative steps and imposes accountability for their completion on identified OPP members, from the first responding officer to the detachment commander.⁷ Most importantly, Police Orders 2.18.2⁸, in tandem with 2.7 (Criminal Investigation Management/Procedures)⁹, require that any missing person investigation must consider foul play as a possibility until there is evidence to the contrary, and must comply with the requirements of a criminal investigation.¹⁰ Any delay in the initial reporting of a missing person increases the urgency of the investigation.¹¹

11. Both Police Orders 2.7 and 2.18 are amongst the eighteen critical policies that all OPP members¹² must be familiar with.¹³

⁴ Ibid., Evidence of Chief Supt. Mark Pritchard, p. 242, and Exhibit 137, Evidence Overview / Table of Contents of Chief Superintendent Mark Pritchard, OPP, pp. 8-10.

⁵ Ibid., Exhibit 127, OPP Orders, Chapter 2.18 “Missing Person” pp. 1-6.

⁶ Ibid., Exhibit 128, OPP Missing Person Manual, Missing Persons Unidentified Bodies (MPUB) Unit Investigation & Support Bureau, February 2011, pp. 1-18.

⁷ Ibid., Evidence of Chief Supt. Mark Pritchard, pp. 214-217, and Exhibit 137, Evidence Overview / Table of Contents of Chief Superintendent Mark Pritchard, OPP, pp.8-10.

⁸ Ibid., Exhibit 127, OPP Orders, Chapter 2.18 “Missing Person”, 2.18.2, p. 1.

⁹ Ibid., Exhibit 132, OPP Orders, The Missing Person Policy applies to uniform members of the OPP, as opposed to civilian members, as per Exhibit 127, OPP Orders, Chapter 2.18 “Missing Person”, 2.18.1, p. 1. For the purposes of these submissions, we will be referring to OPP members and officers interchangeably. Chapter 2.7 “Criminal Investigation Management Procedures”, pp.1-6.

¹⁰ Ibid., Evidence of Chief Supt. Mark Pritchard, pp. 217 and 229-233.

¹¹ Ibid., Evidence of Chief Supt. Mark Pritchard, p. 218, and Exhibit 137, Evidence Overview / Table of Contents of Chief Superintendent Mark Pritchard, OPP, p. 10-11.

¹² The Missing Person Policy applies to uniform members of the OPP, as opposed to civilian members. See Exhibit 127, OPP Orders, Chapter 2.18 “Missing Person”, 2.18.1,

12. OPP policy requires that OPP members take a missing person report immediately, regardless of where the report originates. This means that the OPP will initiate a report in circumstances where the missing person is believed to be, or was last seen, in the jurisdiction of another police service.
13. An initial report of a missing person is recorded electronically in the computer-assisted dispatching system (CAD). Whether the report comes to the call centre, or in-person to a frontline officer, the information gathered is automatically time-stamped and then becomes available in real time to all OPP members, including supervisors and the Provincial Operations Centre.¹⁴ There is no discretion to decline to take a missing person report, or to delay receipt of such a report.¹⁵
14. Police Orders 2.18 details the responsibilities of the first responding OPP member in a missing person investigation. This officer is required to attend at the location of the person making the report, conduct a detailed interview, and establish a perimeter at the scene where appropriate.¹⁶ Thereafter, the officer is required to commence an investigation, recording the information gathered and the investigative steps taken electronically in the mandated “Lost or Missing Person Questionnaire”¹⁷ and the “Evaluating Search Urgency”¹⁸ form.¹⁹ These forms, which are intended to

p. 1. For the purposes of these submissions, we will be referring to OPP members and officers interchangeably.

¹³ Ibid., Evidence of Chief Supt. Mark Pritchard, pp. 213-216, and Part II Volume X, Evidence of Chief Supt. Mark Pritchard, p. 10.

¹⁴ Ibid., Evidence of Chief Supt. Mark Pritchard, pp. 219-222, Exhibit 127, OPP Orders, Chapter 2.18 “Missing Person”, 2.18.8, p. 2, and Exhibit 137, Evidence Overview / Table of Contents of Chief Superintendent Mark Pritchard, OPP, pp. 10-13.

¹⁵ Ibid., Evidence of Chief Supt. Mark Pritchard, p. 219.

¹⁶ Ibid., Evidence of Chief Supt. Mark Pritchard, p. 223, Exhibit 127, OPP Orders, Chapter 2.18 “Missing Person”, 2.18.8 and 2.18.9, pp. 2-4, and Exhibit 137, Evidence Overview / Table of Contents of Chief Superintendent Mark Pritchard, OPP, p. 13.

¹⁷ Ibid., Exhibit 129, OPP Lost or Missing Person(s) Questionnaire, Form 226 ER035 2014/11, pp.1-12.

¹⁸ Ibid., Exhibit 130, OPP Evaluating Search Urgency, Form ER036 2014/10, p.1.

¹⁹ Ibid., Evidence of Chief Supt. Mark Pritchard, p. 224, Exhibit 127, OPP Orders, Chapter 2.18 “Missing Person”, 2.18.8 and 2.18.9, pp. 2-4, Exhibit 128, OPP Missing

strictly control officer discretion and to ensure consistency and equality in missing person investigations, must be submitted to a supervisor before the officer ends his or her shift.²⁰ Once created, they are available to all OPP members through their mobile work stations.²¹

To ensure that reports of missing persons are responded to in a timely and non-discriminatory manner, the OPP proposes:

- **That police services take missing persons reports regardless of jurisdiction.**

B. Supervisor Involvement and Accountability

15. Close supervision by senior officers is an essential component of the OPP's efforts to ensure that discretion is appropriately exercised, and that missing person investigations are conducted in a competent and non-discriminatory manner.²² A communications centre supervisor is notified as soon as a person is reported missing. Typically, a road supervisor Sergeant will also be notified at the time that the first responding officer is dispatched.²³ As discussed above, the records created as part of the investigation are available to all OPP members, including all supervisors in the chain of command, as well as First Nation Police Services.²⁴

16. The primary responsibility of supervisors in a missing person investigation is to ensure that the proper resources have been deployed, and that the potential for foul

Person Manual, Missing Persons Unidentified Bodies (MPUB) Unit Investigation & Support Bureau, February 2011, p. 4, and Exhibit 137, Evidence Overview / Table of Contents of Chief Superintendent Mark Pritchard, OPP, pp. 13-15.

²⁰ Ibid., Evidence of Chief Supt. Mark Pritchard, pp. 225-228, and Exhibit 137, Evidence Overview / Table of Contents of Chief Superintendent Mark Pritchard, OPP, pp. 15-16.

²¹ Ibid., Evidence of Chief Supt. Mark Pritchard, p. 228.

²² Ibid., Evidence of Chief Supt. Mark Pritchard, p. 226.

²³ Ibid., Evidence of Chief Supt. Mark Pritchard, pp. 235-236, and Exhibit 137, Evidence Overview / Table of Contents of Chief Superintendent Mark Pritchard, OPP, p. 15.

²⁴ Ibid., Evidence of Chief Supt. Mark Pritchard, p. 235; Note: In these submissions, the phrase "First Nation Police Services" is used in the generic sense, and not the statutory definition of a "police service" under the *Police Services Act*.

play is continuously assessed.²⁵ As stated by Chief Supt. Pritchard, the risk of discrimination is also reduced by “having a number of people involved in the decision making, not leaving one person out there to make a bad decision on their own, having supervisors, potentially multiple supervisors, involved in that decision.”²⁶

17. The OPP has a variety of resources that can be deployed to respond to missing persons, including the Emergency Response Team, tracking canines, Unmanned Aerial Systems equipped with Forward-Looking Infrared, GPS tracking devices, and social media analysts.²⁷ The OPP also has the Provincial Liaison Team (PLT), a dedicated unit that is mandated to respond to critical incidents involving Indigenous people and to develop ongoing relationships with Indigenous communities. PLT members, many of whom are Indigenous, are deployed throughout the province and can be engaged to enhance good communications with families and Indigenous leadership during missing person investigations.²⁸

To ensure that missing person investigations are conducted in a competent and non-discriminatory manner, the OPP proposes:

- **That police services ensure internal supervision and review in respect of missing person investigations.**

²⁵ Ibid., Evidence of Chief Supt. Mark Pritchard, p. 236, Exhibit 127, OPP Orders, Chapter 2.18 “Missing Person”, 2.18.9, pp. 4-5, Exhibit 132, OPP Orders, Chapter 2.7 “Criminal Investigation Management Procedures”, 2.7.3, pp.2-3, Exhibit 128, OPP Missing Person Manual, Missing Persons Unidentified Bodies (MPUB) Unit Investigation & Support Bureau, February 2011, pp. 4-5, and Exhibit 137, Evidence Overview Table of Contents of Chief Superintendent Mark Pritchard, OPP, pp. 15-19.

²⁶ Ibid., Evidence of Chief Supt. Mark Pritchard, p. 242.

²⁷ Ibid., Evidence of Chief Supt. Mark Pritchard, pp. 210 and 237, Exhibit 127, OPP Orders, Chapter 2.18 “Missing Person”, 2.18.11, pp. 5-6, and Exhibit 137, Evidence Overview Table of Contents of Chief Superintendent Mark Pritchard, OPP, pp. 29-32.

²⁸ Ibid., Evidence of Chief Supt. Mark Pritchard, pp. 239-240, and Exhibit 137, Evidence Overview Table of Contents of Chief Superintendent Mark Pritchard, OPP, pp. 32-33.

C. Mandatory Training

18. Training is another key component of the OPP's efforts to ensure unbiased and competent missing person investigations. Anti-bias training is a component of virtually every course that is offered at the Provincial Police Academy.²⁹ The OPP offers a five-day, in-person experiential Indigenous Awareness Training course. The course is mandatory for all supervisors and specialists, and available to all OPP members.³⁰

D. Major Case Management

19. Major Case Management ("MCM") is a further means of ensuring high quality and professional investigations.³¹ In circumstances in which foul play is suspected at any time during a missing person investigation, the OPP assigns a major case manager from its criminal investigations branch to the case. Major Case Managers have the rank of Inspector with the OPP, and have extensive experience in conducting complex criminal investigations.³² MCM is mandated through a regulation under the *Police Services Act*.³³

20. MCM has two aspects. First, it is a methodology or framework on how investigations are to be conducted. In particular, MCM employs the "command triangle", consisting of the case manager, the file coordinator and the primary investigator.³⁴ Second, MCM in Ontario utilizes powerful software called PowerCase, which is designed to analyze vast amounts of information and identify linkages in respect of that

²⁹ Ibid., Evidence of Chief Supt. Mark Pritchard, p. 243.

³⁰ Ibid.

³¹ Ibid., Exhibit 133, Ontario Major Case Management Manual, Ontario Ministry of Community Safety and Correctional Services, December 1, 2017, pp. 1-60.

³² Ibid., Evidence of Chief Supt. Mark Pritchard, p. 244.

³³ Ibid., Evidence of Chief Supt. Mark Pritchard, p. 245, and Exhibit 134, *Police Services Act* Ontario Regulation 354/04, Major Case Management, pp.1-2.

³⁴ Ibid., Evidence of Chief Supt. Mark Pritchard, p. 245, and Exhibit 137, Evidence Overview Table of Contents of Chief Superintendent Mark Pritchard, OPP, pp. 23-29.

information. It not only compares the information within the investigative file, but also to the investigative files of all other police services in Ontario.³⁵

21. MCM “prevents information from slipping through the cracks.”³⁶ It imposes accountability on those involved in the investigation. Every piece of information is numbered and tracked. PowerCase creates tasks, assigns them to officers with the necessary skills, knowledge and abilities, and ensures that they are completed and followed up on. Where linkages are identified, the relevant officers are automatically notified and must respond, failing which notification is delivered to a supervisor.³⁷

22. MCM is available to all First Nation Police Services, however only one has implemented it because of funding limitations.³⁸ First Nation Police Services are not mandated to utilize MCM, nor are they funded for it under the federal First Nations Policing Program. The OPP does investigate most of the serious offences in the jurisdiction of First Nation Police Services, although this may not include all sexual assaults or missing person investigations.³⁹ Chief Supt. Pritchard testified that First Nation Police Services should be put in a position to fully implement MCM.⁴⁰

³⁵ Ibid., Evidence of Chief Supt. Mark Pritchard, pp.246-247, and Exhibit 137, Evidence Overview Table of Contents of Chief Superintendent Mark Pritchard, OPP, pp. 23-24.

³⁶ Ibid., Evidence of Chief Supt. Mark Pritchard, p. 246.

³⁷ Ibid., Evidence of Chief Supt. Mark Pritchard, pp.246-249, and Exhibit 137, Evidence Overview Table of Contents of Chief Superintendent Mark Pritchard, OPP, pp. 23-24.

³⁸ Parts II & III Volume XV, Exhibit 14, Human Trafficking in 2018 – Current Policing Landscape, p. 9.

³⁹ Part II Volume IX, Evidence of Chief Supt. Mark Pritchard, pp. 250-251, and Exhibit 137, Evidence Overview Table of Contents of Chief Superintendent Mark Pritchard, OPP, pp. 22-23.

⁴⁰ Ibid., Evidence of Chief Supt. Mark Pritchard, pp. 321-322

To ensure that complex missing person investigations are conducted in a manner that facilitates structure and accountability, and ensures relevant linkages are made, the OPP proposes:

- **That police services implement a single linked computerized Major Case Management system that is nationally linked as a best practice.**

E. The Provincial Operations Centre

23. The OPP Provincial Operations Centre (“POC”) is often involved in missing person investigations, whether or not such involvement is specifically requested by frontline investigators.⁴¹

24. The POC is housed within OPP headquarters in Orillia, Ontario, and is staffed full time by a uniform inspector and uniform officers, along with civilian analysts and social media specialists.⁴² The POC has access to the OPP records management system, and monitors all incidents reported to a communication centre in real time.⁴³ It is responsible for the deployment of the OPP’s specialized resources.⁴⁴ The POC’s social media specialists scour the internet to locate a person’s digital footprint, whether that person is missing or a person of interest. POC analysts will access police databases to identify similar occurrences, looking for patterns that may assist the investigation.⁴⁵

⁴¹ Ibid., Evidence of Chief Supt. Mark Pritchard, pp.253-254, and Exhibit 137, Evidence Overview Table of Contents of Chief Superintendent Mark Pritchard, OPP, p. 33.

⁴² Ibid., Evidence of Chief Supt. Mark Pritchard, p. 252, and Exhibit 137, Evidence Overview Table of Contents of Chief Superintendent Mark Pritchard, OPP, p. 33.

⁴³ Ibid., Evidence of Chief Supt. Mark Pritchard, pp. 252-253, and Exhibit 137, Evidence Overview Table of Contents of Chief Superintendent Mark Pritchard, OPP, p. 33.

⁴⁴ Ibid., Evidence of Chief Supt. Mark Pritchard, pp. 253-254, and Exhibit 137, Evidence Overview Table of Contents of Chief Superintendent Mark Pritchard, OPP, pp. 7 and 33.

⁴⁵ Ibid., Evidence of Chief Supt. Mark Pritchard, pp. 252-253, and Exhibit 137, Evidence Overview Table of Contents of Chief Superintendent Mark Pritchard, OPP, pp. 7 and 33.

25. Significant incidents are reported by the POC to the Commissioner's office and senior command.⁴⁶ The POC provides another layer of accountability and quality control to OPP missing person investigations.

F. Improving Communication with Indigenous Families and Communities

26. The confidence of families, loved ones and Indigenous communities is essential to ensuring competent and non-discriminatory missing person investigations. Missing person investigations must not only be conducted in a professional and effective manner, they must be conducted in a manner that earns the trust of affected communities. As stated by Chief Supt. Pritchard:

“So I don't think the two issues can be looked at in isolation of each other. Investigative practices and best practices, they go hand in hand with our community relations and those trusting relationships that are at the core of being able to provide an effective police service.”⁴⁷

27. Chief Supt. Pritchard was candid in his assessment of how well the OPP was meeting this standard, based both on the OPP's outreach to family members and the work of the National Inquiry:

“...[W]hen we read the interim report issued by the Commission, the common theme amongst the families appeared to be – well, there's two common themes, the lack of trusting relationships and poor communication. So, that's an area that we thought we were doing well in, and clearly not doing as well as we thought we were and an area we need to improve on.”⁴⁸

28. Current OPP policy, as reflected in the MCM manual, establishes the duties of a Victim Liaison Officer (“VLO”) but does not specify the knowledge, skills and abilities required for this role, nor how to train or assess an OPP member for this role.⁴⁹

⁴⁶ Ibid., Evidence of Chief Supt. Mark Pritchard, p. 252.

⁴⁷ Ibid., Evidence of Chief Supt. Mark Pritchard, p. 258.

⁴⁸ Ibid., Evidence of Chief Supt. Mark Pritchard, pp. 254-255.

⁴⁹ Ibid., Evidence of Chief Supt. Mark Pritchard, p. 257, Exhibit 133, Ontario Major Case Management Manual, Ontario Ministry of Community Safety and Correctional Services,

Conventionally, the VLO is positioned outside of the investigation team to protect against the inadvertent disclosure of “holdback” information.⁵⁰

29. The OPP has recently examined promising practices developed by the U.S. Federal Bureau of Investigation with a view to developing a new model for communicating with victims, families and loved ones in missing person and other investigations involving Indigenous people.⁵¹ The model being explored by the OPP has two aspects:

(a) **Written Communication Plans** with families and loved ones would establish the “how, when and who with” of police communications during the currency of an investigation. A Written Communication Plan would be developed in collaboration with the involved family. It would be a fluid agreement, subject to change to meet the evolving needs of family and loved ones. The OPP has been engaging with Indigenous leadership and family members on this initiative to ensure that it is culturally appropriate.⁵²

(b) **Victim Specialists** are civilian employees who are embedded in an investigative team. Locating this role within the investigative team will improve communications from the police to family members and from family members to the police. Victim Specialists would not replace the advocacy role of community-based victim services providers.⁵³

December 1, 2017, pp. 30-31, and Exhibit 137, Evidence Overview Table of Contents of Chief Superintendent Mark Pritchard, OPP, p. 28.

⁵⁰ Ibid., Evidence of Chief Supt. Mark Pritchard, p. 257.

⁵¹ Ibid., Evidence of Chief Supt. Mark Pritchard, p. 255.

⁵² Ibid., Evidence of Chief Supt. Mark Pritchard, p. 256, and Exhibit 137, Evidence Overview Table of Contents of Chief Superintendent Mark Pritchard, OPP, p. 36.

⁵³ Ibid., Evidence of Chief Supt. Mark Pritchard, pp. 257-258, and Exhibit 137, Evidence Overview Table of Contents of Chief Superintendent Mark Pritchard, OPP, p. 36.

To improve communications with families and loved ones during missing person investigations, the OPP proposes:

- **That police services consider developing a protocol for the creation of written communication plans with families in respect of major investigations.**
- **That police services consider the creation of a victim specialist position with defined roles/responsibilities and appropriate training.**

30. Ontario's Family Information Liaison Unit ("FILU")⁵⁴ is also available to OPP missing person investigators as a means of communication with families and loved ones. Ontario established its FILU in partnership with Justice Canada, to support families of MMIWG to access information related to the loss of their loved ones.⁵⁵ Ontario's FILU is part of the Indigenous Justice Division⁵⁶ and began providing services to families of MMIWG in March 2017.

31. The FILU has four field offices located in Sudbury, Thunder Bay, Sioux Lookout and Toronto.⁵⁷ FILU staff are members of Indigenous communities who have years of experience working with Indigenous women and girls. They bring a deep understanding of the historical context of violence against Indigenous women and girls and the unique needs of families who have suffered the loss of a loved one.⁵⁸

32. Ontario's FILU facilitates Family Circles, which most often involve affected family members, the investigating police service, and the Office of the Chief Coroner. The

⁵⁴ https://www.attorneygeneral.jus.gov.on.ca/english/family_information_liaison_unit.php

⁵⁵ Part II Volume I, Exhibit 14, Overview of Family Information Liaison Units, Department of Justice Canada, pp. 1-7, and Exhibit 15(a), Victim Services in Canada (2018), Research and Statistics Division, Department of Justice Canada, p. 39.

⁵⁶ Ibid., Exhibit 15(a), Victim Services in Canada (2018), Research and Statistics Division, Department of Justice Canada, p. 39.

⁵⁷ Ibid., Evidence of Naomi Giff-MacKinnon, p. 160, and Exhibit 15(a), Victim Services in Canada (2018), Research and Statistics Division, Department of Justice Canada, p. 39.

⁵⁸ https://www.attorneygeneral.jus.gov.on.ca/english/family_information_liaison_unit.php

Circles provide a trauma-informed, culturally relevant and safe space for families to ask questions and receive information about their loved one. The Circles often include an Elder or other supports upon the families' request. The Circles can assist families to move forward in their healing process and also provide an opportunity to establish trust between officials and family members.

To maintain respectful communications with families and loved ones during and after police investigations, the OPP proposes:

- **That a model consistent with the Family Information Unit continue to be operational. Any such unit should be staffed by Indigenous people, and work closely with relevant Indigenous organizations and service providers. This unit should employ Indigenous methodologies and protocols, and provide trauma-informed and safe spaces for families to receive information about their loved ones from police, Crown prosecutors and coroners.**

G. Improving Public Awareness about Missing Person Investigations

33. Chief Supt. Pritchard provided evidence with respect to the importance of the OPP's role in raising public awareness about missing persons investigations. In particular, Chief Supt. Pritchard described the significance of Missing Person Awareness Days that are held in First Nation communities across Ontario⁵⁹:

“And, at those days, there is the opportunity for community members to speak to officers if they want to report somebody missing, or have a misunderstanding of perhaps somebody that's gone missing and days gone by, but have never been reported. And, that's certainly something we've experienced in Ontario where we have had deceased people in a morgue that are unidentified, and then, you

⁵⁹ Part II Volume IX, Exhibit 137, Evidence Overview / Table of Contents of Chief Superintendent Mark Pritchard, OPP, pp. 39-40.

know, through our resolve initiative⁶⁰ have determined that they were in fact missing from somewhere but not reported.”⁶¹

The OPP proposes the following recommendation to improve knowledge of and communications about missing persons investigations:

- **That awareness be raised about missing persons investigations within Indigenous communities.**

H. Supports for Returning Missing Persons

34. As reported by Chief Supt. Pritchard, the OPP receives approximately 500 to 800 missing person reports pertaining to youth in Kenora, Ontario.⁶² In response, in 2017 the OPP implemented a Kenora Youth Mobile Crisis and Outreach Team. Comprised of two officers and a social worker, the Team worked with agency operated group homes to establish relationships with and interview youth who were located after being the subject of missing persons reports.⁶³ Chief Supt. Pritchard spoke about the promising results of the pilot project in Kenora:

“They’ve certainly seen a huge reduction in the number of missing youths being reported, because jointly they’re addressing what – the causes of why they’re running away and, you know, trying to address that issue that’s at the core of it to prevent them from running away. And ultimately, many of those kids will end up in the justice system or as potential targets of human trafficking. And that’s just

⁶⁰ The Resolve Initiative (also known as the Missing Persons and Unidentified Bodies Unit) is a joint initiative of the OPP and the Office of the Chief Coroner that uses a database drawn from information provided by the public, the OPP and police services to help resolve cases pertaining to missing people and unidentified human remains; Exhibit 137, Evidence Overview / Table of Contents of Chief Superintendent Mark Pritchard, OPP, p. 34.

⁶¹ Part II Volume X, Evidence of Chief Supt. Mark Pritchard, p. 129.

⁶² Ibid., Evidence of Chief Supt. Mark Pritchard, p. 61.

⁶³ Part II Volume IX, Exhibit 137, Evidence Overview / Table of Contents of Chief Superintendent Mark Pritchard, OPP, p. 36.

one other way of, you know, attacking problems from a broad spectrum and bringing every tool to the table as an analogy to address those issues.”⁶⁴

To enhance supports for youth who are the subject of missing person reports, the OPP proposes:

- **That police services consider developing a practice of conducting return interviews for youth who run away from their place of residence.**

I. Relationship Building with Indigenous Communities

35. Improving relationships with Indigenous communities must be part of a more effective response to missing persons, as well as to policing more generally. Since the Ipperwash Inquiry⁶⁵, engagement with Indigenous communities has been a high priority for the OPP. This is reflected in both formal processes such as the Inclusion Councils for the Commissioner and the Regional Commanders⁶⁶, and in more informal relationship building mechanisms:

“I think since the Ipperwash inquiry, the OPP has changed drastically. We’ve worked very hard to build those relationships with our communities. Our senior commanders work very hard in building relationships. Many First Nations leaders, chiefs, regional chief – deputy grand chiefs, regional chiefs have our contact information. And, I can tell you myself, I fielded so many calls from First Nations leaders where they’re not happy with the work or response of an officer, and being able to deal with the situation in a timely fashion at that level can really rectify a lot of those issues. And, I think rectifying them timely is crucial to having those relationships of trust.”⁶⁷

⁶⁴ Ibid.

⁶⁵ <https://www.attorneygeneral.jus.gov.on.ca/inquiries/ipperwash/index.html>

⁶⁶ Part II Volume X, Evidence of Chief Supt. Mark Pritchard, p. 181.

⁶⁷ Part II Volume IX, Evidence of Chief Supt. Mark Pritchard, pp. 243-244.

36. Relationship building is essential for the delivery of effective policing services by frontline officers on the ground.⁶⁸ It requires an understanding of the tremendous diversity within Indigenous communities in Ontario:

“...[E]specially in the north, from my experience, anyhow, if I can refer to that, chief and council plays a huge role, and they’re – they carry a heavy burden. They can open up a lot of doors, and that simple show of respect to them and their roles can be very beneficial to the investigation and to healing. And, paying a respect to traditional local practices is also very important for officers to understand. And, there’s 133 First Nations in Ontario, and every one of them is different from the others, so those traditions and practices can be very unique. Even amongst communities [that are] very close together, geographically.”⁶⁹

37. The OPP respectfully requests that this Commission pay particular attention to programs that facilitate engagement between the justice system and Indigenous youth. Chief Supt. Pritchard provided evidence with respect to two such programs.

(i) Project Journey

38. At the request of the youth of Pikangikum First Nation, Chief Supt. Pritchard presented a video that they created about their hopes for the future and the positive impact that Project Journey has had on their community.⁷⁰ This evidence powerfully demonstrates the value of adopting a collaborative, strength-based approach to youth engagement.⁷¹

39. Project Journey is not a program that is delivered by the OPP. Rather, it represents a collaboration between Pikangikum Chief and Council, the Education Authority, the Health Authority, Elders, with the OPP playing a coordinating role. The project helps

⁶⁸ Ibid., Evidence of Chief Supt. Mark Pritchard, pp. 258-259.

⁶⁹ Part II Volume X, Evidence of Chief Supt. Mark Pritchard, p. 181.

⁷⁰ Part II Volume IX, Exhibit 135, Project Journey Video, MP4 format, 862 MB (24 minutes 47 seconds), and Evidence of Chief Supt. Mark Pritchard, p. 260.

⁷¹ Ibid., Evidence of Chief Supt. Mark Pritchard, p. 261.

youth overcome their day-to-day challenges, and to build both life skills and self-esteem through community development, volunteer and recreational activities.⁷² It is based on a model developed in the United States called Project Venture.⁷³

40. The OPP is involved in the administration of a similar program in Kenora, Dryden, Sioux Lookout and Fort Frances called Project Sunset.⁷⁴ It is a model that could be extended to communities not directly policed by the OPP.⁷⁵

41. In both Project Journey and Project Sunset, OPP officers participate in some of the programming components with the youth. In the video that was prepared for the National Inquiry, the youth from Pikangikum First Nation spoke about the positive change in the relationship between the OPP and the community as a result of Project Journey.

In recognition of the role that programs like Project Journey play in reducing the vulnerability of Indigenous women and girls to violence, the OPP proposes:

- **That awareness be raised about Project Venture, Project Journey and Project Sunset and that sustainable funding for such projects be allocated across Canada.**

(ii) Niigan Mosewak

42. The OPP also administers a diversion program for at-risk Indigenous youth aged 11 to 15.⁷⁶ Niigan Mosewak is a summer camp centred around First Nation teachings, along with team-building, sports and outdoor activities. Delivered with support from

⁷² Ibid., Evidence of Chief Supt. Mark Pritchard, p. 259, and Exhibit 137, Evidence Overview / Table of Contents of Chief Superintendent Mark Pritchard, OPP, pp. 41-44.

⁷³ Ibid., Exhibit 137, Evidence Overview / Table of Contents of Chief Superintendent Mark Pritchard, OPP, p. 42.

⁷⁴ Ibid., Exhibit 137, Evidence Overview / Table of Contents of Chief Superintendent Mark Pritchard, OPP, p. 41.

⁷⁵ Part II Volume X, Evidence of Chief Supt. Mark Pritchard, pp. 184-185.

⁷⁶ Part II Volume IX, Exhibit 137, Evidence Overview / Table of Contents of Chief Superintendent Mark Pritchard, OPP, p. 44.

Elders, community members, teachers, OPP members and youth mentors, the program focuses on the delivery of life skills, leadership development, healthy relationships, respect and self-esteem.⁷⁷

43. The program relies on referrals from courts, OPP members, community leadership and Elders. It operates during the summer for four to five weeks per year, and is not available throughout the province.⁷⁸

In recognition of the value of diversion programs in the rehabilitation of Indigenous youth, and in promoting healthy relationships, the OPP proposes:

- **That police officers consider pre-charge diversion, with a particular focus on culturally appropriate alternatives, for Indigenous youth and adults when they come into contact with law enforcement. Such initiatives should be provided with adequate and sustainable funding.**

III. HUMAN TRAFFICKING

44. The Commission has heard from numerous witnesses that Indigenous women and girls are acutely vulnerable to human trafficking. This reality requires a response that transcends police enforcement, and which attempts to address the unique circumstances of Indigenous women and girls more broadly.

45. Ontario is one of two provinces with a provincial human trafficking strategy (the “Provincial Strategy”). The Commission heard evidence with respect to the policing and “whole of government” aspects of the Provincial Strategy. This section will

⁷⁷ Part II Volume X, Evidence of Chief Supt. Mark Pritchard, pp. 125-126, and Part II Volume IX, Exhibit 137 Evidence Overview / Table of Contents of Chief Superintendent Mark Pritchard, OPP, p. 44.

⁷⁸ Part II Volume X, Evidence of Chief Supt. Mark Pritchard, pp. 125-126.

explore both of these components as evidence of “best practices” to address the scourge of human trafficking.

A. Police Responses to Human Trafficking

46. The OPP, through the evidence of Inspector (“Insp.”) Tina Chalk, acknowledged the need to enhance its efforts to address the victimization of Indigenous women and girls through human trafficking.⁷⁹ Insp. Chalk identified gaps⁸⁰ in the OPP’s emerging response to human trafficking, and offered best practices to address these gaps.⁸¹ It is evident that an urgent, national effort will be required to combat the human trafficking of Indigenous women and girls. The OPP is committed to being a leader in this effort.

(i) Human Trafficking presents challenges to police enforcement efforts

47. While human trafficking is not new, the OPP’s understanding and awareness of its complex and evolving dynamics is. Insp. Chalk starkly described the challenges that human trafficking, and in particular the trafficking of Indigenous women and girls, presents to police efforts to address it:

(a) **Cross-jurisdictional nature of human trafficking.** Victims are often lured from remote communities, and then transported to more urban settings where the demand is higher.⁸² Insp. Chalk discussed a scenario of a victim being lured from Wabeseemoong (White Dog) First Nation to Kenora, and thereafter being conveyed to Thunder Bay and Toronto. In such a scenario, the offence would be committed in the jurisdiction of Treaty 3 Police Service, the OPP, the Thunder Bay Police Service, and finally the Toronto Police Service. The investigation of

⁷⁹ Parts II & III Volume XV, Evidence of Insp. Tina Chalk, p. 104.

⁸⁰ Ibid., Exhibit 14, Human Trafficking in 2018 – Current Policing Landscape, pp. 1-3.

⁸¹ Ibid., Exhibit 14, Human Trafficking in 2018 – Current Policing Landscape, pp. 4-20, and Exhibit 19, Recommendations proposed by the OPP with respect to Human Trafficking, pp.1-2.

⁸² Ibid., Exhibit 14, Human Trafficking in 2018 – Current Policing Landscape, pp. 1 and 3.

such an offence would require coordination and collaboration amongst four police services, and thereafter the offices of three or four Crown prosecutors.⁸³

(b) **Human trafficking is an extremely lucrative offence.** Insp. Chalk explained the incentives to offenders that have led to the explosive growth of this crime. Unlike firearms or narcotics, which are risky to obtain and can only be sold once, a human trafficking victim can be controlled through a variety of coercive means, and then repeatedly sold.⁸⁴

(c) **The internet/social media facilitates human trafficking.** According to Insp. Chalk, traffickers “can enter any one of our children’s bedrooms at a minute’s notice without entering your home.”⁸⁵ Social media allows traffickers to identify and build a rapport with an unlimited number of vulnerable women and girls, all with anonymity and a low risk of detection.⁸⁶

(d) **Human trafficking victims are vulnerable.** In the words of one human trafficking survivor, describing the vulnerabilities of victims (as reported by Insp. Chalk): “you need to fix these needs or a trafficker will.”⁸⁷ Victims are vulnerable because of poverty, isolation, youthfulness, low self-esteem, mental health, trauma, addictions, child welfare involvement, and racism. Each of these factors corresponds to the unique circumstances affecting Indigenous women and girls, arising from attempts at colonization, assimilative government policies, and systemic racism.⁸⁸

⁸³ Ibid., Evidence of Insp. Tina Chalk, pp. 95-96.

⁸⁴ Ibid., Evidence of Insp. Tina Chalk, pp. 96-97.

⁸⁵ Ibid., Evidence of Insp. Tina Chalk, p. 97.

⁸⁶ Ibid., Evidence of Insp. Tina Chalk, pp. 97-99, and Exhibit 14, Human Trafficking in 2018 – Current Policing Landscape, p. 2.

⁸⁷ Ibid., Evidence of Insp. Tina Chalk, p. 103.

⁸⁸ Ibid., Evidence of Insp. Tina Chalk, pp. 100-102, and Exhibit 14, Human Trafficking in 2018 – Current Policing Landscape, p. 3.

- (e) **Low visibility.** Human trafficking occurs in locations that are not typically accessible to the police, such as motel rooms and vacation rentals.⁸⁹
- (f) **Lack of public awareness.** Human trafficking can be “hidden but in plain sight”⁹⁰ because of low public awareness of the crime and the stigmatization of its victims. This lack of awareness is endemic amongst police, victims, health, transportation and hospitality service providers, and the broader community.⁹¹
- (g) **Complex and resource-intensive investigations.** Human trafficking investigations can expand very quickly. Victims often identify numerous other victims and traffickers each of which requires police investigative focus and resources.⁹² The offence is often committed through the use of technology, requiring significant resources to unlock digital devices and access records from phone and internet providers.⁹³

To better respond to the investigative challenges posed by the use of technology by human traffickers, the OPP proposes:

- **That the police be provided with the necessary legal authority to ensure the preservation of, and timely access to, electronic and digital evidence, including content data, basic subscriber information and transmission details for telecommunications and internet service providers. The legal authority should include the power to compel disclosure of encryption keys or passwords to facilitate such access, for the purposes of community safety.**

⁸⁹ Ibid., Evidence of Insp. Tina Chalk, p. 99, and Exhibit 14, Human Trafficking in 2018 – Current Policing Landscape, p. 2.

⁹⁰ Ibid., Evidence of Insp. Tina Chalk, p. 99.

⁹¹ Ibid., Evidence of Insp. Tina Chalk, p. 99, and Exhibit 14, Human Trafficking in 2018 – Current Policing Landscape, pp. 1-3.

⁹² Ibid., Evidence of Insp. Tina Chalk, pp. 103-104.

⁹³ Ibid., Evidence of Insp. Tina Chalk, pp. 103-104, and Exhibit 14, Human Trafficking in 2018 – Current Policing Landscape, pp. 1-2.

48. It is likely that many of the challenges identified by Insp. Chalk will be common to police services across the country. The next section in Ontario's submissions will identify "best practices" offered by the OPP to address these challenges.

(ii) The OPP's efforts to address the challenges posed by human trafficking

49. Insp. Chalk identified a number of gaps faced by the OPP in addressing human trafficking, and discussed the OPP's efforts to bridge these gaps. She outlined several areas for improvement, and the development of promising "best practices", as follows:

50. **Coordination.** Insp. Chalk acknowledged that, until recently, the OPP's efforts to address human trafficking were "*ad hoc*" and lacking in coordination.⁹⁴ In 2016, the OPP's Anti-Human Trafficking Investigation Coordination Team was formed.⁹⁵ Fully staffed, it is led by Insp. Chalk, with a Detective Staff Sergeant, a Detective Sergeant, two Detective Constables, an Internet Search Specialist, an Operational Intelligence Analyst, two Forensic Analysts and an Administrative Assistant.⁹⁶

51. The Team conducts its own complex investigations, supports investigations by OPP members, and municipal and First Nation police services, develops training, and engages in public awareness initiatives. On a weekly basis, the Team reviews missing person data to identify potential human trafficking cases, and ensures coordination amongst municipal and First Nation policing partners through designated liaison officers with responsibility for anti-human trafficking efforts.⁹⁷

⁹⁴ Ibid., Evidence of Insp. Tina Chalk, pp. 92-93 and 105.

⁹⁵ Ibid., Evidence of Insp. Tina Chalk, p. 105, and Exhibit 14, Human Trafficking in 2018 – Current Policing Landscape, pp. 11-12.

⁹⁶ Ibid., Evidence of Insp. Tina Chalk, p. 106, and Exhibit 14, Human Trafficking in 2018 – Current Policing Landscape, pp. 13-14.

⁹⁷ Ibid., Evidence of Insp. Tina Chalk, pp. 107-108, and Exhibit 14, Human Trafficking in 2018 – Current Policing Landscape, pp. 15-17.

The OPP proposes the following recommendations to address the need for coordination in police responses to human trafficking:

- **That police training with respect to human trafficking be coordinated across Canada to reflect its cross-jurisdictional nature.**
- **That police services create a dedicated officer or unit to coordinate efforts to address human trafficking.**

52. **Training.** Insp. Chalk acknowledged the need for the OPP to improve its training with respect to human trafficking, especially as it pertains to ensuring that frontline officers understand the vulnerabilities of Indigenous victims and survivors.⁹⁸ Insp. Chalk advocated for dedicated human trafficking training to be developed in consultation with Elders, Knowledge Keepers and survivors.⁹⁹

53. At present, the OPP delivers 90 minutes of human trafficking-specific training to recruits, in addition to the 90 minutes that all constable trainees receive through the Ontario Police College.¹⁰⁰ Supervisors and Specialists receive human trafficking focused training through the Criminal Investigator Training, the Sexual Assault Investigator Training, the Highway Enforcement Training, the Front-Line Supervisor's Training, and the Major Case Management Training courses.¹⁰¹ The OPP will be delivering training to the Provincial Liaison Team who is responsible for building relationships with Indigenous communities at the local level.¹⁰² The OPP is

⁹⁸ Ibid., Evidence of Insp. Tina Chalk, p 109.

⁹⁹ Ibid., Evidence of Insp. Tina Chalk, pp. 109-110.

¹⁰⁰ Ibid., Evidence of Insp. Tina Chalk, p. 110, and Exhibit 14, Human Trafficking in 2018 – Current Policing Landscape, pp.18-19.

¹⁰¹ Ibid., Evidence of Insp. Tina Chalk, pp. 110-111, and Exhibit 14, Human Trafficking in 2018 – Current Policing Landscape, pp.18-19.

¹⁰² Ibid., Evidence of Insp. Tina Chalk, p. 113.

also in the process of delivering two-day Interdiction for the Protection of Children Training (the “Texas Model”) to frontline officers.¹⁰³

The OPP proposes the following to address the need for enhanced police training on human trafficking:

- **That police services introduce or enhance training on the dynamics of human trafficking. This training should include the Indigenous-specific dimensions of human trafficking, including the factors that make Indigenous women and girls more vulnerable to violence. The training should be delivered to recruits, specialists and frontline officers, and be regularly reinforced through ongoing communications.**

- **That Indigenous communities be consulted on the design of police training with respect to human trafficking.**

54. **Policy.** Insp. Chalk recognized that there are gaps in OPP policy that negatively affect human trafficking investigations.¹⁰⁴ Insp. Chalk provided the Commission with recommendations to address policy gaps. In particular, she suggested that MCM protocols be amended to permit real-time secure access to information when potential linkages are made through PowerCase.¹⁰⁵ Consistent with the OPP’s recommendation that there be a dedicated human trafficking officer or unit for each police service, she is updating policy to require that the Team be notified when any human trafficking case is identified or suspected.¹⁰⁶

¹⁰³ Ibid., Evidence of Insp. Tina Chalk, pp. 111-112, and Exhibit 14, Human Trafficking in 2018 – Current Policing Landscape, pp.19-20.

¹⁰⁴ Ibid., Evidence of Insp. Tina Chalk, pp. 113-114.

¹⁰⁵ Ibid., Evidence of Insp. Tina Chalk, pp. 114-116, and Exhibit 14, Human Trafficking in 2018 – Current Policing Landscape, p. 9.

¹⁰⁶ Ibid., Evidence of Insp. Tina Chalk, pp. 113-114, and Exhibit 14, Human Trafficking in 2018 – Current Policing Landscape, p. 4.

The OPP proposes the following to improve police policy to address human trafficking:

- **That police services use a common major case management software that permits real-time secure access to information in the database that would provide a human trafficking investigator the ability to review the data in order to identify potential linkages. Due to the trans-national nature of human trafficking offences and the frequency in which offenders relocate themselves and/or their victims across jurisdictional boundaries, the timely sharing of information between police services is essential if these offences are to be prevented or successfully investigated and prosecuted.**

55. Public Awareness. Insp. Chalk testified that the OPP could do more to foster greater public awareness about human trafficking.¹⁰⁷ The OPP has recently leveraged social media in an anti-human trafficking campaign, with promising results.¹⁰⁸ It is also adapting toolkits created under the U.S. Homeland Security’s “Blue Campaign” to the Ontario context, to educate hotel, hospitality and transportation personnel about the indicia of human trafficking.¹⁰⁹ With respect to public awareness specifically for Indigenous communities, the OPP participates in Missing Person Awareness Days by providing presentations and information on a variety of topics including human trafficking.¹¹⁰ The second day of the two-day session is designed by the community based on their self-identified needs.¹¹¹ To

¹⁰⁷ Ibid., Evidence of Insp. Tina Chalk, pp. 99 and 116.

¹⁰⁸ Ibid., Evidence of Insp. Tina Chalk, pp. 116-117.

¹⁰⁹ Ibid., Evidence of Insp. Tina Chalk, pp. 117-118, and Exhibit 14, Human Trafficking in 2018 – Current Policing Landscape, p. 20.

¹¹⁰ Ibid., Evidence of Insp. Chalk, pp. 118-120, Exhibit 14, Human Trafficking in 2018 – Current Policing Landscape, p. 15, and Exhibit 15, Missing Person Awareness Day Poster.

¹¹¹ Ibid., Evidence of Insp. Chalk, pp. 119-120.

date, the OPP has held six Missing Person Awareness Days in First Nation communities, with additional dates scheduled in the future.¹¹²

The OPP proposes the following recommendations to enhance police efforts to foster public awareness of human trafficking:

- **That police services should support community-driven efforts to raise awareness and prevent human trafficking, and to support survivors.**
- **That police services support enhanced public awareness regarding human trafficking, targeted at the hotel, hospitality, transportation, resource extraction, and child welfare sectors.**
- **That awareness be raised about the vulnerability of Indigenous women and girls to human trafficking both within Indigenous communities and non-Indigenous communities.**

56. Victim Support. Insp. Chalk acknowledged the need for enhanced long-term supports for human trafficking victims.¹¹³ The Victim Specialist position described by Chief Supt. Pritchard in his evidence forms part of a response to filling this gap.¹¹⁴ However, police officers lack the skills and education required to fulfill the complex needs of victims and survivors. A comprehensive solution requires police to engage supports from the broader community.¹¹⁵ One model to mobilize such community supports is the Community Coalition, a standing committee of service providers,

¹¹² Ibid., Evidence of Insp. Chalk, p. 119, and Exhibit 14, Human Trafficking in 2018 – Current Policing Landscape, pp. 12 and 15.

¹¹³ Ibid., Evidence of Insp. Chalk, pp. 102-103 and 125.

¹¹⁴ Part II Volume IX, Evidence of Chief Supt. Mark Pritchard, pp. 256-258, and Exhibit 137, Evidence Overview / Table of Contents of Chief Superintendent Mark Pritchard, OPP, pp. 39-40.

¹¹⁵ Parts II & III Volume XV, Evidence of Insp. Tina Chalk, pp.125-126, and Exhibit 14, Human Trafficking in 2018 – Current Policing Landscape, pp. 16-17.

professionals and community members dedicated to supporting human trafficking victims and survivors. The police have a role to play in these coalitions.¹¹⁶

To enhance supports for victims and survivors of human trafficking, the OPP proposes the following recommendations:

- **That police services support and participate in community coalitions and other community mobilization efforts, with a view to addressing long-term supports for human trafficking survivors. This support and participation should be available to Indigenous communities as well as non-Indigenous communities.**
- **That police services develop new models for victim liaison, including the victim specialist position. Priority should be given to recruiting people who are Indigenous and/or who have lived experience to fulfill these roles.**
- **That police services develop policies that would require personnel to offer Indigenous-specific victim support services where available.**

57. Engagement. Insp. Chalk emphasized the need for the OPP to improve its engagement with Indigenous people and human trafficking survivors. She observed that Indigenous organizations, including the Ontario Native Women's Association, have a greater understanding with respect to the needs of Indigenous victims and survivors than the OPP does.¹¹⁷ She identified the lack of trust of police as a significant barrier, but put the onus on the OPP to work to restore that trust: "that's a

¹¹⁶ Ibid., Evidence of Insp. Tina Chalk, pp. 125-128, Exhibit 14, Human Trafficking in 2018 – Current Policing Landscape, p. 16, and Exhibit 18, Terms of Reference of Reclaiming Freedom Rebuilding Lives (RFRL) Anti-Human Trafficking Coalition of Simcoe County, pp. 1-9.

¹¹⁷ Ibid., Evidence of Insp. Tina Chalk, pp. 123-124, and Exhibit 14, Human Trafficking in 2018 – Current Policing Landscape, pp. 16-17.

long road and again, that's a road that the police are responsible for."¹¹⁸ Through the Provincial Anti-Trafficking Coordination Office (PATCO), the OPP has access to advice from victims and survivors through the Lived Experience Roundtable.¹¹⁹

To improve police engagement with Indigenous communities and human trafficking victims and survivors, the OPP proposes:

- **That police services improve engagement with non-governmental organizations that serve Indigenous human trafficking survivors, to ensure that survivors can exercise meaningful choices as to whether to report offences to the police.**
- **That police services should support the creation of, or engage with existing, permanent advisory tables comprised of people with lived experience to guide their efforts to address human trafficking.**

58. Knowledge Gaps. Insp. Chalk admitted that there are significant knowledge gaps with respect to how and the rate at which Indigenous women and girls are victimized by traffickers. This is in part due to issues concerning data collection and identification of victims.¹²⁰

¹¹⁸ Ibid., Evidence of Insp. Tina Chalk, p. 124.

¹¹⁹ Ibid., Evidence of Insp. Tina Chalk, pp. 124-125, and Evidence of Assistant Deputy Attorney General Juanita Dobson, p. 179, and Exhibit 21, "Organization of Victim Services in Ontario," Ontario Ministry of the Attorney General, Victims and Vulnerable Persons Division pp. 18-19.

¹²⁰ Ibid., Evidence of Insp. Tina Chalk, pp. 104 and 369-370, and Exhibit 14, Human Trafficking in 2018 – Current Policing Landscape, pp. 2.

To address knowledge gaps concerning the unique needs of Indigenous trafficking victims and survivors, the OPP proposes:

- **That police services support race-based data collection with a view to better understanding the impact and dynamics of human trafficking in Indigenous communities. Police services should support Indigenous communities and organizations in conducting their own research, with access to data in accordance with applicable privacy and access legislation.**
- **That police services employ an evidence-based approach to the design of training, the development of investigative practices, and deployment with respect to human trafficking.**

B. Whole of Government Response to Human Trafficking

59. In the section above, Ontario made submissions concerning the aspects of the Provincial Strategy for which the Ontario Provincial Police are responsible. In this section, Ontario will outline the non-policing components of the Provincial Strategy with a view to offering “best practices” for the Commission’s consideration. These submissions draw on the evidence provided by Assistant Deputy Attorney General Juanita Dobson from the Victims and Vulnerable Persons Division of the Ontario Ministry of the Attorney General (“MAG”).

60. First, this section will address some of the history of Ontario’s efforts to address violence against Indigenous women and girls through collaboration and partnership with Indigenous Peoples. Second, the development of the Provincial Strategy will be discussed. Third, this section will explain how existing victims’ supports were adapted and enhanced to better meet the needs of human trafficking survivors. Finally, this section will discuss new structural and legislative responses to human trafficking that arise from the Provincial Strategy.

(i) Ontario's Efforts to Address Violence against Indigenous Women and Girls

61. Ontario has engaged in a collaborative process with Indigenous leadership and organizations to develop an Ontario strategy to address violence against Indigenous women and girls.

62. Significantly, this process was not initiated by the Ontario government. Rather, it resulted from Indigenous people and organizations engaging in their own work to develop their own priorities and approaches. Ontario's contribution was to provide capacity funding for a series of summits, gatherings and research projects to support this work. Ontario officials were also invited to participate in these discussions.¹²¹ This process culminated in the creation of "A Strategic Framework to End Violence Against Aboriginal Women" (the "Strategic Framework") in 2007.¹²² The Strategic Framework was endorsed by the Ontario government in 2008.¹²³

63. In 2010, the Joint Working Group to End Violence Against Indigenous Women (the "Joint Working Group") was established to advance the goals of the Strategic Framework.¹²⁴ The Joint Working Group represented an equal partnership between the Ontario government and Indigenous organizations, co-chaired by Sylvia Maracle (Executive Director of Ontario Federation of Indigenous Friendship Centres) and an Assistant Deputy Minister-level Ontario official. It consisted of a Director-level staff table, with responsibility for developing recommendations and projects, as well as an

¹²¹ <http://www.onwa.ca/upload/documents/owd-violence-summit-final-report-2007-pdf.pdf>, Parts II & III Volume XV, Evidence of ADAG Juanita Dobson, pp. 138-139, and Exhibit 21, "Organization of Victim Services in Ontario," Ontario Ministry of the Attorney General, Victims and Vulnerable Persons Division, p. 11.

¹²² <http://ofifc.org/sites/default/files/docs/Strategic%20Framework%20to%20End%20VA%20AW.pdf>

¹²³ Parts II & III Volume XV, Exhibit 21, "Organization of Victim Services in Ontario," Ontario Ministry of the Attorney General, Victims and Vulnerable Persons Division, p. 11.

¹²⁴ Ibid., Evidence of ADAG Juanita Dobson, p. 140, and Exhibit 21, "Organization of Victim Services in Ontario," Ontario Ministry of the Attorney General, Victims and Vulnerable Persons Division, p. 11.

Assistant Deputy Minister-level table with responsibility for approvals, funding and the overall strategy.¹²⁵

64. Ms. Dobson drew a distinction between the Joint Working Group structure, premised on partnership and collaboration, and a more conventional consultative process, where government officials present a well-developed policy framework for comment by stakeholders.¹²⁶ She described the Joint Working Group structure as a new and unfamiliar approach for government officials. Although there were challenges with operationalizing the structure, this model enabled Ontario to work more closely with Indigenous organizations and to understand the needs of Indigenous communities more fully.¹²⁷

65. The Joint Working Group process resulted in the creation of “Walking Together: Ontario’s Long-Term Strategy to End Violence Against Indigenous Women” (the “Long-Term Strategy”).¹²⁸ The Joint Working Group was restructured with the formation of the “Ending Violence Against Indigenous Women Executive Committee” and six Provincial Committees, with responsibility for implementing key initiatives under the following six priority areas: prevention and awareness; improved data and research; child, youth and families; policing and justice; human trafficking; and, community safety and healing.¹²⁹ The Executive Committee and each of the

¹²⁵ Ibid., Evidence of ADAG Juanita Dobson, pp.140-142.

¹²⁶ Ibid., Evidence of ADAG Juanita Dobson, p.144.

¹²⁷ Ibid., Evidence of ADAG Juanita Dobson, pp.145-146.

¹²⁸ https://files.ontario.ca/mi-2006_evaiw_report_for_tagging_final-s.pdf; for the Year 1 and Year 2 Updates of “Walking Together”, see <https://www.ontario.ca/page/walking-together-ontarios-long-term-strategy-end-violence-against-indigenous-women-year-one-update> and <https://www.ontario.ca/page/walking-together-ontarios-long-term-strategy-end-violence-against-indigenous-womenyear-two-update>, Parts II & III Volume XV, Evidence of ADAG Juanita Dobson, p. 143, and Exhibit 21, “Organization of Victim Services in Ontario,” Ontario Ministry of the Attorney General, Victims and Vulnerable Persons Division, p. 11.

¹²⁹ Parts II & III Volume XV, Evidence of ADAG Juanita Dobson, pp. 143-144, Exhibit 22, Terms of Reference of the Executive Committee to End Violence against, document updated March 21, 2017, pp.1-6, Exhibit 23, Terms of Reference of the Provincial Committees to End Violence Against Indigenous Women, updated March 21, 2017,

Provincial Committees is co-chaired by Ontario officials and Indigenous representatives.¹³⁰ Work on the Long Term Strategy is ongoing.

(ii) Developing Ontario's Strategy to End Human Trafficking

66. Human trafficking became an area of focus for the Ontario government as a result of, among other things, discussions within the Joint Working Group and the introduction of a private members bill proposing a range of legislative responses.¹³¹

67. The Provincial Strategy was introduced in 2016. It was preceded by extensive consultations across the province, including engagement with Indigenous survivors and service providers.¹³²

68. The Provincial Strategy involves a victim-centred, trauma-informed and “whole of government” approach to addressing human trafficking.¹³³ The four components are prevention and community supports; enhanced justice sector initiatives; Indigenous-led approaches; and, provincial coordination and leadership.¹³⁴ As part of the Provincial Strategy, Ontario has introduced a number of enhancements to existing programs, as well as new responses and programs. Many of these initiatives are intended to address the unique circumstances of Indigenous victims and survivors.

(iii) Enhancements to Existing Programs

69. The Provincial Strategy called for Ontario to leverage existing programs to better meet the needs of human trafficking victims and survivors. Each of these

pp.1-6, and Exhibit 21, “Organization of Victim Services in Ontario,” Ontario Ministry of the Attorney General, Victims and Vulnerable Persons Division, pp. 11-12.

¹³⁰ Ibid., Evidence of ADAG Juanita Dobson, p.148.

¹³¹ Ibid., Evidence of ADAG Juanita Dobson, pp.149-150.

¹³² Ibid., Exhibit 21, “Organization of Victim Services in Ontario,” Ontario Ministry of the Attorney General, Victims and Vulnerable Persons Division, p. 16

¹³³ Ibid., Evidence of ADAG Juanita Dobson, p.151.

¹³⁴ Ibid., Evidence of ADAG Juanita Dobson, pp.151-152, Exhibit 24, Ontario’s Strategy to End Human Trafficking, Ministry of Community and Social Services, last modified March 8, 2018, pp. 1-3, and Exhibit 21, “Organization of Victim Services in Ontario,” Ontario Ministry of the Attorney General, Victims and Vulnerable Persons Division, p. 17.

enhancements included aspects that are intended to address the circumstances of Indigenous victims and survivors.

70. **Victim Crisis Assistance Ontario (“VCAO”)** is a program delivered through funding to 47 community agencies across the province and five alternate service delivery providers in Northern Ontario.¹³⁵ VCAOs provide 24/7 crisis intervention and supports to victims in the immediate aftermath of a crime, including emergency transportation, safety planning, and referrals to other community agencies.¹³⁶

71. The VCAO program was enhanced under the Provincial Strategy through additional funding for staff compliment and training.¹³⁷ The human trafficking training is delivered by specialized Crown prosecutors and staff from the Indigenous Justice Division of MAG. The training provides an understanding of the specific needs of human trafficking victims, and situates human trafficking in the context of Indigenous realities.¹³⁸

72. The **Victim Quick Response Program (“VQRP”)** is a set of services and supports provided to victims through VCAO agencies to respond to their immediate needs after a crime is committed.¹³⁹ As a result of consultation with human trafficking survivors and service providers, VQRP was enhanced to fund additional services

¹³⁵ Ibid., Exhibit 26, Victim Crisis Assistance Ontario list of agencies, p. 1, and Exhibit 21, “Organization of Victim Services in Ontario,” Ontario Ministry of the Attorney General, Victims and Vulnerable Persons Division, p. 6.

¹³⁶ Ibid., Evidence of ADAG Juanita Dobson, pp.154-155, Exhibit 25, Victim Crisis Assistance Ontario Program Standards, Ontario Ministry of the Attorney General, Victim and Vulnerable Persons Division, September 1, 2017, pp.1-21, and Exhibit 21, “Organization of Victim Services in Ontario,” Ontario Ministry of the Attorney General, Victims and Vulnerable Persons Division, p. 6.

¹³⁷ Ibid., Exhibit 21, “Organization of Victim Services in Ontario,” Ontario Ministry of the Attorney General, Victims and Vulnerable Persons Division, pp. 25-26.

¹³⁸ Ibid., Evidence of ADAG Juanita Dobson, p. 159.

¹³⁹ Ibid., Evidence of ADAG Juanita Dobson, pp. 160-164, Exhibit 27, Victim Quick Response Program Standards, Ontario Ministry of the Attorney General, Victim and Vulnerable Persons Division, September 2016, pp.1-12, and Exhibit 21, “Organization of Victim Services in Ontario,” Ontario Ministry of the Attorney General, Victims and Vulnerable Persons Division, pp. 7-9.

and supports for trafficking survivors such as tattoo removal, replacement of government identification, clothing, food and emergency accommodation.¹⁴⁰

73. The **Victim Witness Assistance Program (“VWAP”)** provides victim witness service workers in all court jurisdictions across the province to assist victims who are involved in court processes. The workers provide information about court process and victims’ rights, testimonial aids, and updates on the status of cases, including court dates and bail conditions. They also provide referrals to other community agencies that provide support to victims and survivors.¹⁴¹

74. To better address the needs of human trafficking victims, three dedicated VWAP workers with specialized expertise in human trafficking were added. These workers provide mentorship to other VWAP workers throughout the province.¹⁴² In addition, all VWAP workers are being provided “Bimickaway” Indigenous cultural competency training.¹⁴³

75. Bimickaway is an Anishinabemowin word that means “to leave footprints”. Its curriculum is based on extensive Indigenous community engagement and guidance from the Elders’ Council that informs the work of the Indigenous Justice Division. It consists of five three-hour core training modules, using an Indigenized and Indigenous methodological approach to its delivery. It is delivered in small groups to ensure meaningful discussions and activities. Bimickaway is co-led by one Indigenous facilitator and one non-Indigenous facilitator to model reconciliation. An

¹⁴⁰ Ibid., Evidence of ADAG Juanita Dobson, pp. 164-165, Exhibit 21, “Organization of Victim Services in Ontario,” Ontario Ministry of the Attorney General, Victims and Vulnerable Persons Division, p. 26, and Exhibit 27, “Victim Quick Response Program Standards”.

¹⁴¹ Ibid., Evidence of ADAG Juanita Dobson, pp. 165-166, and Exhibit 21, “Organization of Victim Services in Ontario,” Ontario Ministry of the Attorney General, Victims and Vulnerable Persons Division, pp. 5-6.

¹⁴² Ibid., Evidence of ADAG Juanita Dobson, p. 167, and Exhibit 21, “Organization of Victim Services in Ontario,” Ontario Ministry of the Attorney General, Victims and Vulnerable Persons Division, p. 25.

¹⁴³ Ibid., Evidence of ADAG Juanita Dobson, pp. 167-168.

Elder is invited to participate in the training, adding their meaningful life experiences to the curriculum.

76. Indigenous-specific Victim Services are funded through the Indigenous Justice Division. These services are designed by and delivered through Indigenous communities and organizations.¹⁴⁴ In addition, Mushkegowuk and Matawa Tribal Councils are funded through the Indigenous Justice Division to provide services specifically to human trafficking survivors.¹⁴⁵ These Tribal Councils also deliver training for service providers and public awareness sessions in remote First Nation communities.¹⁴⁶

(iv) New Initiatives under the Provincial Strategy

77. The Provincial Strategy also recognized the need for new structures and legislative responses to combat human trafficking. Many of these initiatives have Indigenous-specific aspects.

78. The **Human Trafficking Prosecution Team** is responsible for prosecuting human trafficking cases, developing enhanced training for frontline prosecutors, police officers and VWAP workers, and providing ongoing advice to police and prosecutors with respect to investigations and prosecutions. As a result of a training program developed and delivered by the Prosecution Team, there is at least one Human Trafficking Designated Crown in each court jurisdiction.¹⁴⁷

¹⁴⁴ Ibid., Evidence of ADAG Juanita Dobson, p. 169, Exhibit 29, List entitled “Indigenous-specific Victim Services – Direct Client Services Programs”, pp.1-4, and Exhibit 21, “Organization of Victim Services in Ontario,” Ontario Ministry of the Attorney General, Victims and Vulnerable Persons Division, p. 33.

¹⁴⁵ Ibid., Evidence of ADAG Juanita Dobson, p. 170, and Exhibit 21, “Organization of Victim Services in Ontario,” Ontario Ministry of the Attorney General, Victims and Vulnerable Persons Division, p. 33.

¹⁴⁶ Ibid., Exhibit 21, “Organization of Victim Services in Ontario,” Ontario Ministry of the Attorney General, Victims and Vulnerable Persons Division, p. 33.

¹⁴⁷ Ibid., Evidence of ADAG Juanita Dobson, p. 171, and Exhibit 21, “Organization of Victim Services in Ontario,” Ontario Ministry of the Attorney General, Victims and Vulnerable Persons Division, pp. 24 and 30-31.

79. The Prosecution Team consists of a Provincial Crown Coordinator and five experienced trial prosecutors. It was created out of the recognition that human trafficking cases are factually and legally complex, and that a specialized and coordinated approach is required.¹⁴⁸

80. The **Provincial Anti-Trafficking Coordination Office (“PATCO”)** oversees and coordinates Ontario’s whole of government, multi-ministry approach to human trafficking. Housed with the Ministry of Children, Community and Social Services (MCCSS), PATCO is led by a Director with lived experience.¹⁴⁹ In addition to its coordination role, PATCO leads several initiatives under the Provincial Strategy including:¹⁵⁰

(a) The Human Trafficking Lived Experience Roundtable is comprised of survivors of human trafficking who meet quarterly to provide advice on implementation of the Provincial Strategy. The Roundtable meets with ministry representatives to provide input on system, policy and program changes, engagement with other survivors, Indigenous perspectives, and the evaluation of programs directed at implementing the Provincial Strategy.¹⁵¹

(b) Indigenous-specific Public Awareness. MCCSS has awarded a contract to an Indigenous marketing agency to develop a public awareness campaign targeted at Indigenous communities. The campaign includes posters, social media and postcards which have been distributed to key stakeholders throughout

¹⁴⁸ Ibid., Evidence of ADAG Juanita Dobson, p. 171, and Exhibit 21, “Organization of Victim Services in Ontario,” Ontario Ministry of the Attorney General, Victims and Vulnerable Persons Division, p. 24.

¹⁴⁹ Ibid., Evidence of ADAG Juanita Dobson, p. 172, and Exhibit 21, “Organization of Victim Services in Ontario,” Ontario Ministry of the Attorney General, Victims and Vulnerable Persons Division, p. 18.

¹⁵⁰ For a complete description of PATCO’s mandate, see Exhibit 21, “Organization of Victim Services in Ontario”, pp.18-23.

¹⁵¹ Ibid., Evidence of ADAG Juanita Dobson, p. 179, and Exhibit 21, “Organization of Victim Services in Ontario,” Ontario Ministry of the Attorney General, Victims and Vulnerable Persons Division, p. 18.

the province. Feedback on these materials was sought and received from the Provincial Committee on Human Trafficking.¹⁵²

(c) Ontario’s Confidential Human Trafficking Helpline (1-833-999-9211) allows people to call for information or to find services if they or someone they know may be at risk of being trafficked. The Helpline connects callers to provincial resources and support networks.¹⁵³

(d) The Indigenous-led Initiatives Fund (“ILIF”) was established to support both capacity building and service delivery projects designed, led and delivered by and for Indigenous people.¹⁵⁴ The projects are intended to provide Indigenous survivors with access to services, help prevent people from being trafficked, engage people with lived experience, and encourage innovation and community partnerships.¹⁵⁵ PATCO conducted close to fifty engagement sessions with Indigenous communities and organizations to design and deliver ILIF. Seventeen projects have been funded so far.¹⁵⁶ In addition, three projects led by Indigenous organizations have received funding under the Community Supports Fund.¹⁵⁷ The Community Supports Fund provides funding for projects that support both Indigenous and non-Indigenous survivors.

¹⁵² Ibid., Evidence of ADAG Juanita Dobson, pp. 180-181, and Exhibit 21, “Organization of Victim Services in Ontario,” Ontario Ministry of the Attorney General, Victims and Vulnerable Persons Division, pp. 22-23.

¹⁵³ Ibid., Evidence of ADAG Juanita Dobson, p. 180, and Exhibit 21, “Organization of Victim Services in Ontario,” Ontario Ministry of the Attorney General, Victims and Vulnerable Persons Division, p.19.

¹⁵⁴ Ibid., Exhibit 31, “Anti Human Trafficking Indigenous-Led Initiatives Fund – Call for Applications Guide,” Ontario Ministry of Community and Social Services, Provincial Anti-Human Trafficking Coordination Office, April 2017, pp.1-32.

¹⁵⁵ Ibid., Evidence of ADAG Juanita Dobson, p. 172, and Exhibit 21, “Organization of Victim Services in Ontario,” Ontario Ministry of the Attorney General, Victims and Vulnerable Persons Division, p. 21.

¹⁵⁶ Ibid., Exhibit 32, Backgrounder “Ontario Funding Specialized Services for Human Trafficking Survivors,” Ontario Ministry of Community and Social Services, September 28, 2017, pp. 1-5, and Exhibit 21, “Organization of Victim Services in Ontario,” Ontario Ministry of the Attorney General, Victims and Vulnerable Persons Division, p.22.

¹⁵⁷ Ibid.

(e) Indigenous Anti-Human Trafficking Liaisons provide culturally appropriate engagement, resources and services to Indigenous trafficking survivors.¹⁵⁸ They also provide advice, training and capacity building support for service providers¹⁵⁹, and assist ILIF recipients with project implementation.¹⁶⁰ The program is led by the Ontario Native Women’s Association.¹⁶¹

81. In 2017, Ontario enacted the *Anti-Human Trafficking Act, 2017*. The *Act*, among other things, creates an avenue for victims of human trafficking to obtain a protection order, otherwise known as a restraining order, designed specifically to address the unique circumstances of human trafficking.¹⁶² It can be obtained expeditiously on an *ex parte* basis, supported by hearsay evidence, and prior to, during, or after the applicant has been trafficked. There are no time restrictions placed upon when a protection order can be obtained. A protection order can remain in place for up to three years and can be extended, prior to its expiry, for up to another three years.¹⁶³

82. A human trafficking protection order can include any reasonable provision necessary to protect the victim such as prohibiting the trafficker from communicating, directly or indirectly, with the victim or any other specified person. It can prohibit the trafficker from attending at, or within a specific distance of, anywhere the victim resides, attends, or frequents. It can also require the trafficker to return personal effects or documents belonging to the victim, destroy originals and copies of any visual recordings of the victim, and prohibit the trafficker from possessing, transmitting, selling, advertising or distributing any visual recordings of the victim. Additional

¹⁵⁸ Ibid., Exhibit 33, “Ontario’s Strategy to End Human Trafficking – Indigenous Anti-Human Trafficking Liaison Application Guidelines,” pp. 1-14.

¹⁵⁹ Ibid., Evidence of ADAG Juanita Dobson, p. 176.

¹⁶⁰ Ibid., Exhibit 21, “Organization of Victim Services in Ontario,” Ontario Ministry of the Attorney General, Victims and Vulnerable Persons Division, p. 23.

¹⁶¹ Ibid.

¹⁶² Ibid., Evidence of ADAG Juanita Dobson, pp. 181-182, and Exhibit 21, “Organization of Victim Services in Ontario,” Ontario Ministry of the Attorney General, Victims and Vulnerable Persons Division, p. 29.

¹⁶³ Ibid., Exhibit 21, “Organization of Victim Services in Ontario,” Ontario Ministry of the Attorney General, Victims and Vulnerable Persons Division, p. 29.

provisions may be requested that are unique to the victim's particular circumstances to offer a further layer of protection.

83. Persons seeking a protection order under the *Act* are supported through the Free Legal Support for Human Trafficking Survivors Pilot Program.¹⁶⁴ The Program provides human trafficking victims with free, confidential legal advice, assistance with completing a restraining order application¹⁶⁵, and representation in court on the application. A protection order can also be applied for on behalf of a victim by another person with the victim's consent, or by a parent or guardian of a person under 18 who is being trafficked or at risk, without their consent. A victim being trafficked or at risk, another person acting on behalf of a victim with their consent, or a parent or guardian acting without the consent of a person under 18, who is being trafficked or at risk, are all eligible for this free legal service.¹⁶⁶

IV. CONCLUSION

84. Ontario appreciates the opportunity to provide these submissions, and to participate in the Inquiry's hearings.

¹⁶⁴ Ibid., Evidence of ADAG Juanita Dobson, p. 182, Exhibit 21, "Organization of Victim Services in Ontario," Ontario Ministry of the Attorney General, Victims and Vulnerable Persons Division, p. 30, and Exhibit 38, Free Legal Support for Survivors of Human Trafficking, Ontario Ministry of the Attorney General, pp. 1-2.

¹⁶⁵ Ibid., Exhibit 34, "Human Trafficking Restraining Orders – How to apply for a restraining order against a trafficker," Ontario Ministry of the Attorney General, 2018, ISBN 978-1-435-1410-1, pp.1-17, Exhibit 35, Form 1 Application for Restraining under the Prevention of and Remedies for Human Trafficking Act (2017) Ontario Court of Justice, Form PRHTA-1-E 2018/01, pp.1-6, Exhibit 36, Form 5 Affidavit under the Prevention of and Remedies for Human Trafficking Act (2017), Ontario Court of Justice, Form PRHTA-5-E 2018/01, pp. 1-2, and Exhibit 37, Form 9 Restraining Order under the Prevention of and Remedies for Human Trafficking Act (2017), Ontario Court of Justice, Form PRHTA-9-E 2018/01, pp. 1-4.

¹⁶⁶ Ibid., Exhibit 21, "Organization of Victim Services in Ontario," Ontario Ministry of the Attorney General, Victims and Vulnerable Persons Division, p. 30.

85. Ontario has tried to put families and loved ones first in its approach to this Inquiry. Putting families and loved ones first means not only listening, but also taking what is learned and making it part of what we do. Ontario looks forward to receiving the Commission's Final Report and Recommendations, with a renewed commitment to taking action to end violence against Indigenous women and girls.

ALL OF WHICH IS RESPECTFULLY SUBMITTED, THIS 10TH DAY OF DECEMBER, 2018.

Julian Roy

Kate Forget