



THE CODE OF CONDUCT FOR HUMAN TRAFFICKING PREVENTION IN THE NIAGARA REGION **The Hospitality and Tourism Sector**

Developed by TOES Niagara and Brock University, in collaboration with community partners and with funding from WAGE Canada, this Code sets proactive standards for the Niagara hospitality and tourism sector, with support from allied sectors, to prevent human trafficking and protect vulnerable populations.



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Executive Summary

Tools of Empowerment for Success (TOES Niagara), in collaboration with Brock University's Professional and Continuing Studies Office and supported by Women and Gender Equality Canada (WAGE), has spearheaded the development of a comprehensive Code of Conduct to Prevent Human Trafficking in the Niagara Region's Hospitality and Tourism Industry. This initiative, modeled in part on End Child Prostitution & Trafficking (ECPAT) International's globally recognized framework, seeks to address the alarming issue of human trafficking by equipping the hospitality and tourism sectors with awareness, tools, and strategies to protect vulnerable populations, including women, racially marginalized groups, and newcomers.

Through a trauma-informed, gender-based, culturally responsive approach, the initiative aligns with universal human rights principles and centers survivors' dignity and safety. Developed with input from survivors, community, priority sectors, and at-risk populations, the Code of Conduct establishes guidelines and responsibilities for key sectors, including; Hospitality and Tourism, Schools and Education Institutions, Law Enforcement, Community Agencies and Local Government – Niagara Region & Local Area Municipalities, it emphasizes collective responsibility and inclusion, aiming to foster coordinated, survivor-centered responses to human trafficking.

Key components of the Code of conduct to prevent Human Trafficking in Niagara include:

Prevention

Proactive measures to deter trafficking for sexual and labor exploitation, with a focus on protecting disproportionately affected groups such as women and girls.

Protection

Safeguarding the identity, dignity, and safety of survivors, emphasizing confidentiality and trauma-informed, culturally responsive care.

Policy Development

Supporting organizations to implement or enhance trafficking prevention policies, ensuring clear resolution processes and survivor support.

Collaboration

Encouraging partnerships among signatories to strengthen collective anti-trafficking efforts and share promising practices regionally and nationally.

The initiative also includes the establishment of a Steering Committee to provide ongoing evaluation, integrate survivor feedback, and adapt strategies to evolving challenges. Organizations that commit to the Code will benefit in the following ways: Enhanced reputation and trust, access to tailored training and programs, policy development support, accreditation and certification as well as collaboration and networking opportunities, ensuring its successful implementation and sustainability.

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Vision

A safe community for all.

Mission

Niagara is known as a leader in the fight to eradicate human trafficking and committed to making the region “inhospitable” to human trafficking.

Goals

Deter Human Traffickers from operating in Niagara.

Cut the demand for Human Trafficking in Niagara.

Foster proactive public and the community that prevents Human Trafficking.

Protect survivors.

By building capacity across industries and leveraging community partnerships, this project aims to position Niagara as a model for eradicating human trafficking, promoting regional safety, and protecting the most vulnerable.

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Background

Tools of Empowerment for Success (TOES Niagara) in partnership with Brock University Professional and Continuing Studies Office, with funding from Women and Gender Equality Canada (WAGE), established a multi-partner Steering Committee that developed and seeks to adapt this local Code of Conduct to prevent human trafficking in the hospitality and tourism industry in the Niagara region to strengthen the gender-based violence (GBV) sector, based in part on End Child Prostitution & Trafficking (ECPAT) International's *The Code of Conduct for the Protection of Children from Sexual Exploitation in Travel and Tourism*.

This Code seeks to address the need to provide awareness, tools, and support to the hospitality and tourism industry to prevent human trafficking of vulnerable populations (e.g., women, racially-marginalized, newcomers) working and living in the Niagara region.

The development of the Code is, in part, based on the ECPAT model with input from the community including survivors and at-risk populations.

The local Code will be implemented among organizations, and policy development support and training will be provided to these organizations to facilitate a successful implementation.

TOES Niagara will share information on the promising practice with key employers in major border cities so that they may replicate it or expand upon it within their own organizations.

Vision

- A safe community for all.

Mission

- Niagara is known as a leader in the fight to eradicate human trafficking and committed to making the region “inhospitable” to human trafficking.

Values

- Gender-Based Analysis: part of everything we do.

Goals

- Deter Human Traffickers from operating in Niagara.
- Cut the demand for Human Trafficking in Niagara.
- Foster a proactive public and community that prevents Human Trafficking.
- Protect survivors.

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Guiding Principles

- **Universal Human Rights:** Every individual, particularly those from vulnerable groups, such as women, girls, and racially-marginalized communities, has the right to live free from harm, abuse, and exploitation. A trauma-informed, gender-based approach recognizes that addressing the specific needs of these groups is essential to upholding their rights and dignity.
- **Collective Responsibility:** Preventing human trafficking requires a collaborative, community-driven effort. Businesses, community organizations, police services, and community members must work together, with a specific focus on recognizing and addressing the gendered and racialized drivers of trafficking, to protect vulnerable populations and ensure coordinated, survivor-centered responses.
- **Do No Harm:** All actions by signatories must prioritize minimizing harm, with particular attention to the trauma experienced by survivors and those at risk. A gender-based lens will guide interventions to ensure that survivors, especially women and girls, are protected from further harm and that their needs are addressed with care and sensitivity.
- **Confidentiality and Safety:** Signatories will make effort to protect the identity, dignity, and personal information of survivors and those at risk is critical, with a trauma-informed approach ensuring their safety and emotional well-being. Special care will be taken to protect women and girls, who are often at higher risk of retaliation and stigma.
- **Inclusion and Non-Discrimination:** Anti-trafficking efforts will actively address the needs of marginalized and vulnerable groups, including women, racialized communities, and 2S&LGBTQQIA+ individuals. Equal protection from trafficking requires eliminating barriers to services and ensuring that every person, regardless of their gender or background, receives the same level of care and protection.

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Code of Conduct Statement

This Code of Conduct for Human Trafficking Prevention in the Niagara region outlines the responsibilities of key players, actors, businesses, and community partners including hotels, tourism operators, justice system, police services, municipalities, educational institutions, community organizations/agencies, and the broader community, to create a safe environment for all residents and visitors.

By signing this Code, the signatories commit to:

- a. preventing human trafficking for sexual and labour exploitation within the hotel and tourism sector in a bid to make Niagara safe, with a specific focus on protecting vulnerable groups such as women and girls who are disproportionately affected by sexual exploitation;
- b. prioritizing the dignity, rights, and safety of survivors, including protection of confidentiality, identity, and personal data of survivors;
- c. maintaining and enhancing existing human trafficking prevention best practices;
- d. maintaining and/or establishing a human trafficking prevention policy within the organization;
 - This policy will include a clear resolution process. For example, notice of occurrence, protection against reprisal, workplace assessment, emergency procedures, privacy protection, resource avenues, support measures, notices submitted in bad faith, and complaints related to employer non-compliance with the Code or regulations among other key elements;
- e. collaborating with other Code of Conduct signatories to strengthen this Code of Conduct as a collective to prevent human trafficking, protect survivors, witnesses and informants, and ultimately make the Niagara region inhospitable to human traffickers and their clients;
- f. establishing and maintaining a steering committee/working group to evaluate group efforts, review survivor feedback, and continuously update and adapt to the changing efforts and strategies to make human trafficking inhospitable in the Niagara region; and
- g. subscribing to and annual renewal of the accreditation and certification as a compliant signatory of the Code of Conduct for prevention of human trafficking in the hotel and tourism sector in the Niagara region.

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Definitions

1. **Human Trafficking:** According to the UN Protocol to Prevent, Suppress and Punish Trafficking in Persons, human trafficking is defined as “the recruitment, transportation, transfer, harboring or receipt of persons, by means of threat or use of force or other forms of coercion, abduction, fraud, deception, abuse of power or a position of vulnerability, or giving or receiving payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation.”
2. **Sexual Exploitation:** The UN defines sexual exploitation as “any actual or attempted abuse of a position of vulnerability, differential power, or trust for sexual purposes, including but not limited to profiting monetarily, socially, or politically from the sexual exploitation of another.” In the context of human trafficking, it often refers to forced prostitution, sexual slavery, or other forms of sexual abuse.
3. **Labour Exploitation/Forced Labour:** Forced labour, as per the International Labour Organization (ILO), is “work or service which is exacted from any person under the menace of any penalty and for which the person has not offered themselves voluntarily.” Labour exploitation often involves coercion, deceit, abuse of vulnerability, and is a key aspect of human trafficking for labour purposes.
4. **Hospitality and Tourism Industry:** The hospitality and tourism industry, as defined by the UN World Tourism Organization (UNWTO), encompasses a wide range of businesses and services including accommodation, food and beverage services, transportation, travel agencies, and recreation. The industry has been identified as vulnerable to human trafficking, particularly for sexual and labour exploitation, due to its high demand for low-wage and temporary labour, as well as the movement of tourists. In Niagara, this sector may include hotels, motels, inns, B&Bs, Airbnbs and other short-term rentals, wineries, casinos, food and beverage establishments, lodging, tourist attractions, theme parks, night clubs and bars, and meeting, convention, and event spaces.
5. **Schools and Educational Institutions:** The schools and educational institutional sector refers to high schools and post-secondary education institutions.
6. **Law Enforcement:** The activity of enforcing the law by investigating, deterring, rehabilitating, or punishing people who violate the rules and norms governing that society. The term encompasses police, courts and corrections.
7. **Local Government:** This includes the Niagara Region and Local Area Municipalities – the 12 Cities, Towns, and Townships.

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8. **Victim:** The UN defines a victim of human trafficking as “a person who has been subjected to trafficking as defined by the UN Trafficking Protocol.” Victims are individuals who have suffered harm, including physical or mental injury, emotional suffering, economic loss, or substantial impairment of their fundamental rights, as a result of human trafficking or related exploitation.
9. **Survivor:** The UN and many advocacy organizations often refer to individuals who have experienced human trafficking as survivors to highlight their resilience and recovery. A survivor is “a person who has lived through and overcome the experience of human trafficking or exploitation, and is now on the path to recovery, reintegration, and empowerment.” The use of this term emphasizes the agency and strength of individuals who have escaped or been rescued from trafficking and are working towards rebuilding their lives. Throughout the Code, we use the term survivor, rather than victim, to acknowledge this agency and strength.
10. **Community Agencies:** Community organizations (charities, not-for-profits) that work with vulnerable and marginalized groups and survivors of human trafficking, as well as those who are at risk of being trafficked.
11. **Signatories:** All businesses and organizations that sign the Code of Conduct and commit to implementing the Code of Conduct guidelines and responsibilities.
12. **Subscribing:** The act of any new signatory agreeing to all of the provisions of the Code of Conduct.
13. **Renewal:** After re-subscribing to and signing the Code of Conduct, the signatories will renew their subscription as will be guided by the Code of Conduct Steering Committee.

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Code of Conduct Collective Responsibilities & General Guidelines

All signatories and key players who subscribe to and agree to adopt and implement the Code of Conduct will have a collective responsibility to work with TOES Niagara and the Code of Conduct Steering Committee to strengthen all areas in preventing and responding to human trafficking by maintaining best practices, implementing and continuously improving the following:

1. Mandatory Training

Commit to training staff during the onboarding process with the knowledge and tools necessary to recognize and respond to signs of human trafficking, through existing internal training system or by using the training provided by TOES Niagara and Brock University Professional and Continuing Studies.

- a) all staff will complete an initial training on human trafficking awareness, which equips them with skills to recognize the gender-specific signs of exploitation faced by victims, especially women and girls, including appropriate trauma-informed response protocols and reporting procedures;
- b) all staff will complete periodic refresher training (minimum every three-years);
- c) all new hires will complete the training as part of their orientation;
- d) all staff completing the training will be given certification; and
- e) this mandatory culturally and gender-responsive training on human trafficking awareness will include recognizing signs of exploitation and the disproportionate impact on women.

2. Resource Distribution/Public Awareness

All signatories will display human trafficking prevention materials in public areas (such as lobbies and restrooms) outlining the signs of human trafficking and providing information for reporting suspicious activities including support available for any survivor.

3. Support Services and Survivor Assistance:

All signatories will work with Community Agencies and Law Enforcement to:

- a) develop and maintain an emergency procedure to safely protect survivors;
- b) consider and develop ways to support survivors of human trafficking via employment accommodation and safe alternative jobs;
- c) endeavour to provide multilingual resources to support all survivors.
- d) respect the survivors' autonomy by providing the survivor with choices in accessing support. All services offered, including counselling, shelters, and legal assistance should be provided with the survivor's explicit consent;
- e) ensure that the survivors we support never feel forced or obligated to engage with law enforcement; and
- f) have clear referral pathways: existence of trauma-informed procedures for connecting survivors to support services without requiring them to involve law enforcement unless they choose to.

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4. Safe Reporting:

All signatories will:

- a) publicise and display the primary contact number(s) and steps to safely report concerns about human trafficking. For **non-emergency** situations, the Canadian Human Trafficking Hotline: **1-833-900-1010**, which is **available 24/7** and in more than 200 languages, is the appropriate point of contact. For **emergency** situations, **911** is the appropriate point of contact;
- b) provide support for traumatized employees and witnesses of human trafficking through an employee assistance program and/or by collaborating with community agencies.

5. Monitoring and Evaluation:

All signatories will:

- a) establish and maintain a steering committee or oversight system within their organization to monitor and evaluate the effectiveness of the human trafficking prevention policy and procedures.
 - This may be added to the responsibilities of a “Joint Health and Safety Committee” to also monitor and evaluate the effectiveness of the Code;
- b) annually review and update the human trafficking prevention policies and protocols; and
- c) annually report the effectiveness of their efforts to the Code’s Steering Committee.

6. Suppliers & Partners:

All signatories will:

- a) work to encourage their suppliers and partners to become signatories to the Code of Conduct; and
- b) make every effort to contract with suppliers who have a Human Trafficking Prevention policy in place.

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The Code of Conduct Steering Committee Responsibilities

Objectives:

1. To achieve the goal of making the Niagara region inhospitable to human trafficking.
2. To ensure the effectiveness of anti-human trafficking measures through continuous monitoring and evaluation.

1. The Code of Conduct Steering Committee Membership & Function

- a) The founding Steering Committee members shall constitute the initial Code of Conduct Steering Committee.
- b) The initial Code of Conduct Steering Committee will develop mechanisms to recruit and appoint members to the Steering Committee; and
- c) Steering Committee members will develop and agree upon rules of order, including designation of chair, vice-chair, meeting frequency, term of service, and any committees.

2. Annual Review & Evaluation

- a) Conduct an annual review of the Code's effectiveness, ensuring the gender impact and input from women's organizations and gender equality experts; and
- b) Evaluate their efforts and the efforts of the Code signatories, review survivor feedback, review changes in appropriate legislation, and continuously update and adapt efforts to make human trafficking inhospitable in the Niagara region.

3. Data Collection

The Steering Committee will collect gender-disaggregated data on incidents of human trafficking within the region, with a focus on identifying trends, particularly in the exploitation of women and girls, and areas for improvement in prevention and response efforts.

4. Reporting and Accountability

The Steering Committee will publish an annual report on the region's anti-trafficking efforts, including gender-specific data on trafficking cases, successes in addressing the exploitation of women and girls, challenges, and areas for future focus.

5. Continuous Improvement

- a) At a regular interval, the Steering Committee will engage with the Code of Conduct signatories to discuss the efforts made, successes, challenges, and results in making human trafficking inhospitable in the Niagara region's tourism industry;
- b) Develop strategies and actions for continuous improvements; and
- c) Advocate for legislative changes and policy reforms for the hotel and tourism industry.

6. Collect and Analyse Survivors' Feedback

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The Steering Committee will include mechanisms for survivors who have interacted with the system to provide anonymous feedback on the services, supports, and overall system responsiveness with the aim of continuous improvement.

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7. Signatory Accountability

The Steering Committee will consider supportive ways to hold each signatory accountable to the Code of Conduct through agreed upon standard operating procedures and accountability audits.

8. Certification or Accreditation

The Steering Committee will regularly certify/accredit signatories. Factors may include: training, legal compliance, safety, liability protection, etc.

9. Promotion & Marketing

- a) The Steering Committee will oversee the maintenance and improvement of a Code of Conduct subscription and renewal;
- b) Review what each signatory receives when they subscribe to or renew the Code. For example: certificates, stickers, logos, etc.;
- c) Promote signatories' businesses to tourists and residents as places that are inhospitable to human trafficking; and
- d) Seek to increase the number of organizations/businesses subscribing to and renewing the Code, and encourage signatories to vet suppliers and partners. This may include recruiting community champions/leaders.

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Sectoral Guidelines & Responsibilities

The prevention of human trafficking is a collective that will require commitment from key sectors of the region. Five sectors have been selected to commit to specific guidelines and responsibility in the fight to eradicate human trafficking making the region inhospitable to human traffickers.

The priority sectors are:

1. **Hospitality and Tourism**
2. **Schools and Education Institutions**
3. **Law Enforcement**
4. **Community Agencies**
5. **Local Government – Niagara Region & Local Area Municipalities**

Sector Meeting are ongoing to review and approve sector guidelines and responsibilities with the leaders and experts in these sectors.

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References

Legislative References:

Bill S211: [description]

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Appendix

Founding Steering Committee Members:

The Code of Conduct for Human Trafficking Prevention in the Niagara Region – Steering Committee Members

s/n	Organization	Contact Person	Role
1	Greater Niagara Chamber of Commerce	Corrina Massicotte	Chair
2	Destination Niagara Falls	Joyce Morocco	Vice Chair
3	Augustyn Enterprises Inc.	Dave Augustyn	Policy Consultant
4	Brock University	Nathan Cheney	Project Partner
5	Brock University	Katie Keays	Member
6	Brock University	Emily Moore	Research Assistant
7	Canadian Mental Health Association	Tara McKendrick	Member
8	Coldwell Banker Momentum Realty	Shannon Valente	Member
9	Community Member	Brandy Henderson	Public Relations
10	Community Member	Laura Ip	Public Relations
11	FireStarter I.D.E.A.S. LTD	Sharon Njobo	GBA Consultant
12	Marriott Niagara Falls	Anna DiCienzo	Hospitality and Tourism Training Lead
13	Niagara Catholic District School Board	Mary-Ann Mckinley	Member
14	Niagara-on-the-Lake Chamber of Commerce	Kathy Weiss	Member
15	Niagara Regional Police Service	Detective Constable Trevor Janisse	Member
16	Niagara Regional Police Service	Detective Sargeant Tara Ryan	Member
17	Old Stone Inn	Ann-Marie Nitsopoulos	Member
18	Ownera Media	Rowe Prudente	Public Relations
19	Rotary Club of St. Catharines	Lezlie Murch	Member
20	Services 4 Humanity and MSC-Niagara	Naheed Qureshi	Member
21	The Centre de Santé Communautaire	Loubna Moric	Member
22	TOES Niagara	Nyarayi Kapisavanhu	Project Lead
23	TOES Niagara	Mariam Khayinza	Project Assistant

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s/n	Organization	Contact Person	Role
24	Victim Services Niagara	Tarryn Anderson	Member
25	Victim Services Niagara	Alejandra Lazo de la Vega	Member
26	Welland Member of Parliament Office	Anna Oakes	Member
27	YWCA Niagara Region	Elisabeth Zimmermann	Member

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