

EC16.1 Interim Shelter Recovery and Infrastructure Implementation Plan Submission to the Economic and Community Development Committee

By Melissa Goldstein

The SSHA 2020-2021 Winter Service Plan (a component of the Interim Shelter Recovery and Implementation Plan) is inadequate in a number of ways. Unless SSHA quickly develops and executes a realistic plan, based on accurate data, to ensure that in six weeks all Torontonians currently living in encampments have access to safe, warm shelter, people will likely die. And unless SSHA acts immediately to prepare contingency plans to address the possibility that residential evictions are not halted by the province and/or tenants with rent arrears don't receive rent relief, Toronto could experience a wholly predictable, unprecedented humanitarian crisis this winter as tens of thousands of people are evicted from their homes and are faced with a shelter system that is already well over-capacity.

The Plan's version of facts differs significantly from experiences on the ground, with serious implications.

SSHA's Winter Service Plan is premised on data that is not supported by those on the front-lines. Things SSHA says are happening conflict with documented evidence from those in encampments and the people who have been providing support. Data about the number of people in encampments and shelter system vacancy conflict with the estimates and experience of those on the ground. To ensure SSHA's plans and efforts to address the needs of people experiencing homelessness are successful, we need this disparity between what's in the Plan (data about homelessness, the shelter system, and supports for people experiencing homelessness) and the data and experiences of people who are experiencing homelessness and of those who have been supporting them through the pandemic investigated. Specifically:

1. **Shelter capacity:** The Plan is premised on the City currently having hundreds of vacant spaces in the shelter system, yet there is significant anecdotal evidence that when people call looking for a bed, they are turned away. The City is no longer publishing daily shelter capacity statistics, only occupancy statistics. Unless these vacant spaces can be specifically identified and can be accessed, they shouldn't be counted and plans should not be made assuming there is currently capacity in the system.
2. **Encampment population estimates:** The City's estimates of the number of people currently in encampments (350-400 people) is far less than the number estimated by people who support people in encampments, who estimate that there are between 1000 and 1500 people in encampments across the city. It is unclear how the City arrived at their numbers. This discrepancy is obviously of critical importance, given that the Plan only aims to accommodate an extra 560 people this winter.
3. **City COVID-19 response strategy for outreach & encampments:** The Plan states that "the City and community partners took immediate steps to support those sleeping outdoors by mobilizing a COVID-19 response strategy for outreach and encampments that includes: Access to safe indoor space, shelter and housing; Education and infection

prevention, including access to City-operated facilities with showers, washrooms, and drinking water; and Harm reduction and encampment health and safety.”

This contradicts the experience of people in encampments and the volunteers who have been supporting them; clarity and transparency about what is being done and by whom is needed. Which community partners are involved in the working group? Who is at the table? Because it’s not anyone who is actively providing support to encampments. The Plan states that Street to Homes Outreach workers provide people in encampments with water, except that no one on the ground (including the many groups and individuals which have distributed hundreds of thousands of bottles of water since March) has seen S2H workers distributing water. If the City thinks that water is being distributed by City staff, when in reality it is not, that is a huge problem.

4. **Encampment clearing protocol:** The Plan details an encampment-clearing protocol that SSHA implies is being followed by staff: “Before an encampment is cleared by a City Division responsible for enforcement, outreach workers attend the site to offer options of interim or permanent housing, motels or hotels, shelter or respite spaces to individuals to access shelter and support. If an encampment is vacated by individuals choosing to access shelter or housing or to relocate, the site is cleaned by City staff. The City remains focused on the safety of those in encampments and on moving clients sleeping outdoors into safe indoor spaces through shelter programs, hotel spaces and housing options with supports. As one of the key actions identified by the Task Force, SSHA will continue to work with interdivisional and community partners to review and enhance the City’s approach and protocols to encampments using both human rights and public health approaches grounded in evidence-based practices that promote client and community safety.”

Time and time again, people in encampments and those providing support have complained and provided evidence that encampments and people’s belongings are being destroyed by City staff and police prior to people vacating the site and without people vacating the site, and that a human rights approach is not being taken. None of these complaints are taken seriously, investigated or remedied. The City must ensure its own standards and protocols are enforced. The Encampment Support Network recently recommended that Streets to Homes workers follow-through regarding commitments made to encampment residents, as it is essential for building meaningful, trusting relationships, noting that:

- Direct lines of communication between specific workers and encampment residents is essential. Awareness that encampment residents are not always in possession of phones is important.
- Therefore, scheduled and regular visits to encampments with updates on shelter and housing options and city plans are essential.
- S2H processes for housing people should be made clear for encampment residents.
- Provide residents clear information about the rules and conditions of the accommodations available to them, and give them enough time to consider the feasibility and make an informed decision about their future.
- Posting physical notice of plans and shelter availability would be helpful to people.

5. **Human rights approach to serving individuals in encampments:** The Plan states that the “executive Steering Committee” of the City’s encampment operations working group provides “executive leadership in the operationalization of housing as a human right

principles with respect to encampment policy and planning.” And yet, the actions the City has taken to date with regards to encampment policy and planning are inconsistent with the human rights approach to serving individuals in encampments and shelter spaces outlined in the Interim Shelter Recovery Strategy report, which requires:

- Addressing the issues in shelters causing people to seek shelter in encampments. It is the responsibility of the shelter system, health system, and government to ensure individuals experiencing homelessness can access shelter space with confidence in their safety.
 - **The reality:** In addition to an inadequate number of spaces available, there is no mechanism that ensures the concerns of people experiencing homelessness are taken seriously and followed up with action. People have reported sexual assault by staff, abusive behaviour, and unsafe conditions, among other issues, and their complaints have been ignored.
- Ensuring the safety and survival of individuals who have sought shelter in encampments. We must protect, rather than penalize, individuals who cannot access shelter space or have left shelters due to the perception of unsafe conditions.
 - **The reality:** Rather than being protected, people in encampments are being abused and harassed by Park ambassadors and police, and the City’s practice of and approach to clearing encampments is often violent and traumatic for those affected.
- Providing individuals in encampments and shelters with access to housing. Developing plans to move people into housing, with transparent goals and timelines and accountability to meeting these goals, will ensure all relevant partners can work together to end the need for encampments.
 - **The reality:** There have been no transparent goals, timelines, or accountability to meeting these goals with regards to providing people in encampments and shelters with access to housing. The pandemic has been characterized by anxiety-inducing uncertainty, and this lack of transparency around plans and timelines has meant that those experiencing homelessness and those supporting them have experienced even more anxiety about what is to come & have been unable to plan effectively.
- Committing to ongoing meaningful engagement and participation of residents of encampments, recognizing them as human rights-holders and essential partners in any solution to serve them.
 - **The reality:** Residents of encampments have not been engaged at all in participating in solutions to serve them. They are not treated as “essential partners,” but as blights to be cleaned up.

People will die unless a significantly better Winter Service Plan is developed.

1. We need a plan for what’s needed, what’s expected, and what may come.

The fact that the City’s response to the current pandemic crisis is a Winter Plan that prepares to accommodate about the same number of additional people experiencing homelessness as in past winter plans--560 people--is a huge problem. Every winter that number turns out to be woefully inadequate and there is a mad scramble for emergency solutions in response to public pressure. **Given that the current situation is already much worse than in previous years, with hundreds of people sleeping in encampments, and a dramatic increase in homelessness is expected as a result of residential evictions (both legal and illegal), it is**

clear that this target is wholly inadequate to address the realities of the present moment and must be dramatically increased.

SSHA's plan for 2020-2021 is to respond to an increase in homelessness when it happens. That's not planning, that's a plan to react. And by the time a response is developed and implemented, it will necessarily be far too little, far too late. While the City is finally asking the province for a moratorium on residential evictions (although we have yet to see Council publicly and loudly advocate for a moratorium) if the province doesn't do it, we will have an entirely predictable massive humanitarian crisis on our hands with thousands and even tens of thousands of people forced out onto the street and with nowhere to go and the City won't have done a single thing to prepare for it. You would think the City would have learned something about the value of emergency preparedness by now, but given the Interim Shelter Recovery Strategy's failure to even mention current and impending evictions, clearly they have not. **Given the lack of contingency planning, this plan basically guarantees that if the province doesn't restore the moratorium on evictions there will be a massive expansion of homeless encampments across the city and a massive humanitarian crisis in the middle of winter. Even if a moratorium is reinstated, a plan to prevent evictions will still be required if tenants don't receive rent relief/funds for their unpaid rent.**

While SSHA has prepared a plan that is limited to the funds they have available, they should have developed an evidence/data-based plan that adequately responds to the actual need and plans to address possible future scenarios, detailing the money and resources needed to implement these plans. Without this information, Council is unable to secure and/or allot the funds needed to adequately respond to the current homelessness situation and to address future emergencies, because it is unclear what an adequate response would be and how much it would cost.

2. Create a realistic 6-week plan to move people into housing or shelter by December.

Unfortunately, there are now only 6 weeks between now and December, when temperatures will be below freezing all day, every day. The City needs a 6 week plan to move people into housing and shelter between now and December, **with transparent goals and timelines and accountability to meeting those goals, with these plans posted around encampments** so that everyone knows what support is coming and when, and can plan accordingly, and by the end of the 6 weeks, everyone currently in encampments will have access to somewhere warm and safe to be.

With such limited time available, there are only 3 options, which should be pursued simultaneously:

- I. Use funds intended for new shelter spaces to create a rent subsidy program that pre-approves people in encampments for a rent subsidy of up to \$2,500 per month for the next year.** That's significantly less than the cost of a shelter bed or respite cot. To make the subsidy short-term and consistent with the terms of a 1-year lease agreement, people in receipt of a subsidy should be prioritized for the permanently affordable housing that will hopefully have materialized by the end of next year. Having a guaranteed \$2,500 per month will make it relatively easy for people to find a nice market-rate rental unit on the open market, without having to compete with other low-income people for scarce more affordable units. A recent study from Vancouver demonstrates that giving people a lump sum of \$7,500 was transformational in helping people exit homelessness and improve

their well-being: [A BC research project gave homeless people \\$7,500 each — the results were 'beautifully surprising'](#)

- II. Repeat what the city achieved over the past few months--which was an amazing feat and critically necessary-- and **secure an additional 2,000 hotel rooms or apartments in time for people to move in at the beginning of December.**
- III. **Help people live successfully in encampments.** This would involve:
 - Putting a moratorium on encampment clearings and a moratorium on the enforcement of Parks by-laws that justify encampment clearing and harassment of people in encampments.
 - Open parks facilities so that people can access electricity to power cell phones, heaters and electric blankets, and can access washrooms and running water.
 - Providing access to showers: There are only two locations in the entire city where people can access showers: Harrison pool and Lamport Stadium. Many report being bullied by staff when using these facilities because they are taking longer than the short time allotted. More facilities must be made available to people.
 - Providing access to laundry facilities.
 - Providing hot meals and hot beverages.
 - Providing winter survival gear, including winter clothing, sleeping bags, weather resistant tents, shelters (**these inexpensive, warm, shelters are being used in multiple countries in Europe, and the plans are available for free:** <http://iglou.cz/en/>; <https://www.iglou.fr/f-a-q>), tarps, generators that work in cold, fire safety gear like fire extinguishers and sand.
 - Expanding outreach services so people have regular access to support, including healthcare, harm reduction and housing help.

3. Prevent more homelessness by immediately expanding eviction prevention/rent stabilization and subsidy programs.

The only reason we aren't seeing a massive tidal wave of evictions right now, is because the Landlord and Tenant Board is still working its way through eviction hearings for the eviction applications filed before we went into lockdown. A trickle of evictions is bad enough in the middle of a pandemic and a housing and shelter crisis, but a tsunami is coming. People currently facing eviction (as well as those trying to exit homelessness) are being rejected by the rent support programs they know about and have applied for, even with loosened Rent Bank eligibility criteria. However, as the strategy states, it's not until December that "a report on feasibility of expanding the Toronto Rent Bank program and the Eviction Prevention in the Community program will be brought to Planning and Housing Committee." This timeline is wholly inadequate to address the current and anticipated residential eviction crisis. The programs need to be expanded immediately. The EPIC program in particular needs to be much better funded and heavily promoted, as most tenants don't know it exists and don't know how to access it. In addition to modifying the Rent Bank so it disperses grants and eligibility is expanded to include people who are unemployed, it also needs to have the \$4000 per year cap lifted so that tenants experiencing months without income don't lose their housing; this funding increase can be short-term. An 18-month top-up that can be reassessed as the situation evolves. What we need is the financial capacity and flexibility within the tenant support system to respond quickly to emergencies. Requirements that people must have a lease in hand before securing a subsidy must be eliminated, as this functions as a huge roadblock to people securing private-market housing. **Additional funding for eviction prevention needs to be a priority in the 2021 budget.**

4. Operate warming centres every day and expand their number.

The COVID-19 pandemic has resulted in a drastic reduction in the number of indoor spaces people can access during cold weather, and the availability of these spaces changes regularly in response to public health directives. The 2020-21 Winter Plan doesn't take into account the level of impact the pandemic has had on the resources normally available to people who are homeless and precariously housed, stating only that more than one Warming Centre will be opened, and only during Extreme Cold Weather Alerts. With fast-food restaurants across the city that were spaces for people to seek warmth and shelter throughout the day and often overnight are no longer available and many public buildings closed, people need warm, COVID-safe spaces to shelter each and every day throughout the winter, not just during Extreme Cold Weather Alerts.

6. Meet HousingTO 2020-2030 supportive housing targets.

While not an issue with the Winter Service Plan, the fact that the Interim Shelter Recovery Strategy only aims to build 3,000 units of "affordable rental and supportive housing" over the next 2 years, even though The HousingTO 2020-2030 Action Plan, approved by Toronto City Council in December 2019, committed to a target of 1,800 new units of exclusively supportive housing per year over the next ten years, is hugely disappointing. While the Interim Shelter Recovery Strategy recognizes that "the changing housing and real estate markets in the context of the pandemic present new opportunities to advance these goals" and that "the pandemic has also highlighted more than ever that prioritizing permanent housing solutions is the best way to both protect people's health and reduce homelessness" the Strategy not only falls at least 300 units short of the HousingTO supportive housing target, but likely far more, since it is implied in the wording that not all of the 3,000 units will be supportive housing.

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