

September 21, 2020

Sent via email: phc@toronto.ca

Planning and Housing Committee
City of Toronto,
10th floor, West Tower, City Hall
100 Queen St. West
Toronto, Ontario M5H 2N2

Dear Chair and Committee members,

RE: Addressing Housing and Homelessness Issues in Toronto through Intergovernmental Partnerships, PH16.8

I am writing on behalf of the Advocacy Centre for Tenants Ontario (ACTO), a community legal clinic funded by Legal Aid Ontario with a province-wide mandate to support low-income tenants in Ontario.

ACTO strongly supports the recommendations outlined in the report, *Addressing Housing and Homelessness Issues in Toronto through Intergovernmental Partnerships*. We applaud the commitments outlined in the report to promote access to safe, adequate and affordable homes for residents of Toronto living on lower incomes. In particular, the focus on permanent affordable homes and the prevention of evictions is central to positive public health outcomes and allowing the most vulnerable Torontonians to live a life with dignity.

The City's 24-month plan prioritizes those most in need by building a supply of permanent affordable rental and supportive housing that Toronto desperately needs. These investments will also serve as vital infrastructural assets for the City that will give back for years to come.

Providing emergency shelters has always been more costly than providing supportive or social housing. While shelters are an important emergency service for residents in times of need, the continued reliance on these transitional spaces has created a de facto housing response that fails to address homelessness in a meaningful way. We strongly endorse the recommendations to increase investments in creating permanent homes for people facing homelessness.

We would like to bring your attention to three further areas that should be addressed to strengthen the commitment to safe, adequate, and affordable housing:

1. In an agreement made on May 15, 2020 with Sanctuary Ministries, the Canadian Civil Liberties Association and a number of legal clinics including ACTO, the City made a commitment to use its best efforts to achieve and sustain Physical Distancing Standards in the Shelter System and to make shelter beds that meet those standards available to people that need them.

It is clear to us that the City is failing to meet that commitment. Besides facing legal consequences for this failure, you are placing the lives and health of vulnerable people at risk. We urge you to re-examine the approach of the Support, Shelter and Housing Administration to meeting these obligations and to ensure that sufficient financial and human resources are being applied to ensure that the standards are being met and that sufficient beds are being made available. This is especially critical now that the province has lifted the moratorium on residential evictions at a time when COVID infections are on the rise again. We believe that the persistence of homeless encampments across the City is an indication that sufficient resources are not being applied to this critical need.

2. Given that the province has decided that a return to enforcement of eviction orders is a gamble worth taking, we urge the City of Toronto NOT to follow this path. The City has the authority as the service manager and as the sole shareholder of TCHC to ensure that vulnerable residents are not exposed to homelessness and the risk of COVID infection by keeping these low-income residents housed. Thus we ask that you recommend to Council that Toronto Community Housing (TCH) and other social housing providers be directed to refrain from enforcing eviction orders until the pandemic is under control. Like the provincial moratorium in effect from mid-March to the end of July, urgent circumstances in which a household member poses a risk to the safety of the community would be excepted. These actions will ensure that social housing residents can live with a sense of stability during these unprecedented times of economic and mental hardship.
3. Lastly, we urge your Committee to explicitly refer to the City of Toronto's Eviction Prevention in the Community program (EPIC) in the report and to endorse this ground-breaking program for further expansion next year. EPIC's integrated model of wrap-around eviction prevention services has led to its excellent track record in stabilizing housing for the city's most vulnerable residents. This type of integrated, enhanced service model best meets the increasingly complex needs of individuals experiencing homelessness and supports them to transition into permanent housing. Explicitly including EPIC in the wider report and recommendations will ensure that resources are prioritized to help those most in need.

Thank you for attention to our comments and recommendations.

ADVOCACY CENTRE FOR TENANTS ONTARIO

per:



Kenneth Hale,
Director of Advocacy and Legal Services