

August 18, 2021

To: Toronto Accessibility Advisory Committee

Re: Protecting Vulnerable Persons and Reducing Homelessness

There have been reports of landlords, their agents or staff neglecting their duty to accommodate as described in the Human Rights Code, resulting in undue stress, and trauma for persons with disabilities. In practice, it has been reported that landlords or their agents report to Toronto Police Services in an attempt to address ongoing tenant issues either known or obviously attributed directly to a disability. In some cases, residents are unable to respond to allegations due to their disability.

It is unclear the types of education, training and information available to officers responding in these situations and how their actions directly impact eviction prevention, or vulnerable residents at risk of homelessness. Designing a policy ensuring that any officers responding in these sensitive scenarios understand the Human Rights Code, in particular the duty to accommodate, when a person with disabilities is involved is critical to protecting their rights.

In addition, it is critical to understand how the City of Toronto can address this gap through eviction prevention services, and any forthcoming initiatives ensuring that persons with disabilities are made aware of their rights regarding conflicts with landlords and their agencies.

People living with disabilities are especially vulnerable to housing insecurity, and the City of Toronto along with the Toronto Police Services need to work together to ensure that their rights are respected and to reduce their risk of homelessness.

I recommend that the Toronto Accessibility Committee recommend:

1. City Council request the Toronto Police Services Board to conduct a review of any existing policies educating, or informing officers and residents of the Human Rights Code Duty to Accommodate as it pertains to people living with disabilities, landlords and their agencies, and to report back City Council by Q2 of 2022, outlining existing policies, any gaps and recommendations on how to address them, including the feasibility of
 - a. An educational campaign, pamphlets or other accessible documents that list health, disability, legal clinics and other community supports available for the regions each Police Division serves and protects.
 - b. Arranging appropriate supports when it is likely that the rights of people with disabilities under the Human Rights Code are not being addressed, including but not limited to:
 - i. Healthcare,
 - ii. Disability,
 - iii. Legal clinics,
 - iv. Office of the Public Guardian and Trustee, and
 - v. Family, or another appropriate support person.
2. The General Manager, Shelter Support and Housing Administration, in consultation with the General Manager, Social Development and Finance Administration, Executive Director, Housing Secretariat, and relevant divisions to report to the Toronto Accessibility Advisory Committee, on what the City is doing and can further do to ensure that persons with

disabilities are made aware of their rights regarding conflicts with landlords and potential evictions including but not limited to:

- a. Educational campaigns to landlords on Human Rights Code Accommodations;
- b. Eviction prevention services offered through the City of Toronto or other agencies, and
- c. Educational tools and strategies for the Community Crisis Response Teams to support persons living with disabilities

Respectfully submitted,

Michael McNeely