



It is incontrovertible that people living with disability are at risk of becoming unhoused as a result of the low rates of social assistance, the lack of affordable and accessible housing, but also the transgression of many landlords in meeting their human rights obligations to tenants.

We appreciate the Toronto Accessibility Advisory Committee's identification of the latter issue. We also appreciate that the Executive Committee is deliberating on their recommendations with the shared goal of reducing the eviction of people living with disability, and thus the reduction of homelessness. However, we do question the recommendations being presented, insofar as they equally, but not equitably, advise a targeted approach aimed at three demographics: police, landlords, and tenants living with disability.

As an organization that supports 56 agencies operating homelessness services in the City of Toronto, we know that people experiencing homelessness are disproportionately targeted for criminalization. The data makes this clear: [10% of all police interactions with the public occur between officers and unhoused people](#). Because of this, improving the understanding of Toronto Police regarding the rights of people who are currently unhoused, or at risk of becoming unhoused, is a far larger project than the provision of the human rights training advocated for by the Toronto Accessibility Advisory Committee. As well, the budget of Toronto Police far exceeds any other City expense, and adding additional funding to their work is money that we feel could be better applied to tenant-facing supports.

As well, providing education to landlords may make them more knowledgeable, but will it make them compliant? Besides putting public resources into supporting the very people who cause harm to tenants, this proposal does not entail any mechanisms to ensure landlord compliance with their human rights obligations. It also does not account for the fact that some of these abuses occur on purpose: we know that landlords evict tenants, including those living with disability, as a means to enact vacancy decontrol and increase rents.

Rights-education for tenants is important, but this proposal also puts the onus on them to self-advocate, which can be difficult and even risky given the power dynamics between landlords and tenants.

The recommendation of TDIN is that this proposal shift to prioritize tenant-facing supports beyond education. Specifically, we recommend that monies considered for the education of police and landlords be reallocated into a Tenant Defence Fund, so that people living with disability, who are low-income if relying



ODSP, can access adequate supports to justice when faced with discrimination, harassment, and eviction.

We share both the Executive Committee and the Toronto Accessibility Advisory Committee concerns. However, we believe that supports first and foremost should be geared toward tenants and their defence: this is the best way to stave off eviction, and reduce homelessness.

Sincerely,

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