



To: Economic and Community Development Committee

March 23, 2022

Dear Councillors,

FACULTY
OF HEALTH

Critical Disability
Studies

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I am writing on behalf of the Shelter and Housing Justice Network, a network of homelessness and housing advocates, shelter providers, healthcare professionals, faith leaders, legal workers, and researchers who have come together to address the issue of homelessness in Canada on a local, provincial, and national level.

You have before you what you're told is a plan to transition out of the shelter-hotel system that was initiated in response to the COVID-19 pandemic. There are multiple problems with the report.

First and foremost, this is not a plan. This report contains insufficient details to be enacted, aside from closing 231 shelter spaces by May 15, 2022. The only other concrete detail included is that it binds SSHA to close all shelter-hotels by April 30, 2023, unless it obtains additional Council approval, regardless of where shelter-hotel residents have been placed, their wellbeing, the state of the pandemic or any other circumstances.

I commend the city for keeping many of the shelter-hotels open until the spring of 2023. However, planning to close several facilities this year without sufficient plans in place, and planning to close all the facilities without the ability to accommodate people is irresponsible and negligent. Further, while shelter-hotels are obviously inadequate in many ways, they are actually far better than congregate sites. The closure of these sites is a regression in the system, and the unilateral closure without consulting with the residents is a gross injustice.

Numbers Don't Add Up

First, I want to draw your attention to some simple mathematical realities.

There were 9,559 people who are "actively homeless" in the City of Toronto shelter system, as of February 2022.¹

The shelters are full, and people are being turned away. There were 7,812 people in the shelter system on Monday March 21, 2022.² The emergency shelter and family systems were 99.1% full; the shelter-hotel system was 99.3% full. This far exceeds the 90% capacity cap set by Toronto City Council.³ This means that many people were turned away that night. How many we don't know because this is a carefully guarded secret. We know that last winter an average of 38 people a day had nowhere to go come 4:00 AM and they were simply erased from the system. This year we've asked for this data and SSHA has refused to give it; members of the media have asked for this data and SSHA has refused to give it. At least one freedom of information request has been filed to obtain this data, but SSHA has obstructed FOI requests. Based on the one night's worth of data that I have from this year, I believe that people are turned away at significantly higher rates than last year; and I suspect that this is the reason why SSHA

¹ City of Toronto, "Shelter System Flow Data," <https://www.toronto.ca/city-government/data-research-maps/research-reports/housing-and-homelessness-research-and-reports/shelter-system-flow-data/>.

² Appendix A.

³ Toronto City Council, "Status Report on Capacity of the Emergency Shelter System" (1999), <https://www.toronto.ca/legdocs/1999/minutes/council/appa/cc990413/cn4rpt.htm>.



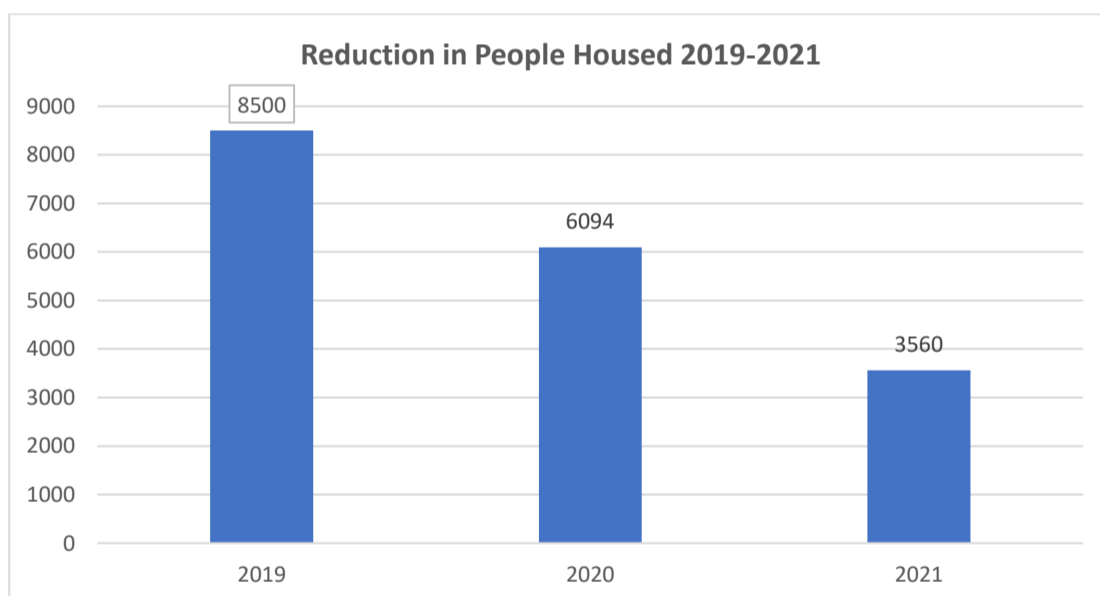
refuses to make these numbers public.⁴ I implore you to ask SSHA what the average number of people who were turned away at 4:00 AM (service queue data) and the average number of people who were turned away at the time of call between (wrap-up code data) between October 30, 2021 and February 28, 2022.⁵

Indeed, by most measures, homelessness continues to worsen in this city. The number of chronically homeless people increased from 48% to 77% between 2018 and 2021.⁶ The reality is that, while the total number of unhoused people decreased due to pandemic related factors, the number of “chronically homeless” people increased by about 1,474 people.

Table 1: Changes in Homelessness, 2018-2021

	2018	2021	Change
Chronically homeless	48%	77%	29%
Total population	8,715	7,347	-1,368
Total chronically homeless	4,183	5,657	1,474

SSHA justifies closing shelter-hotels on the grounds that the City will house many of the people in them. But only 8% of the people who were moved into the shelter-hotels have been housed.⁷ SSHA’s ability to house people has gone down year over year, as the below two charts illustrate. In 2021, SSHA housed fewer than half the number of people it housed in 2018 or 2019, as the rate and number of people unhoused for longer than six months climbed dramatically.⁸



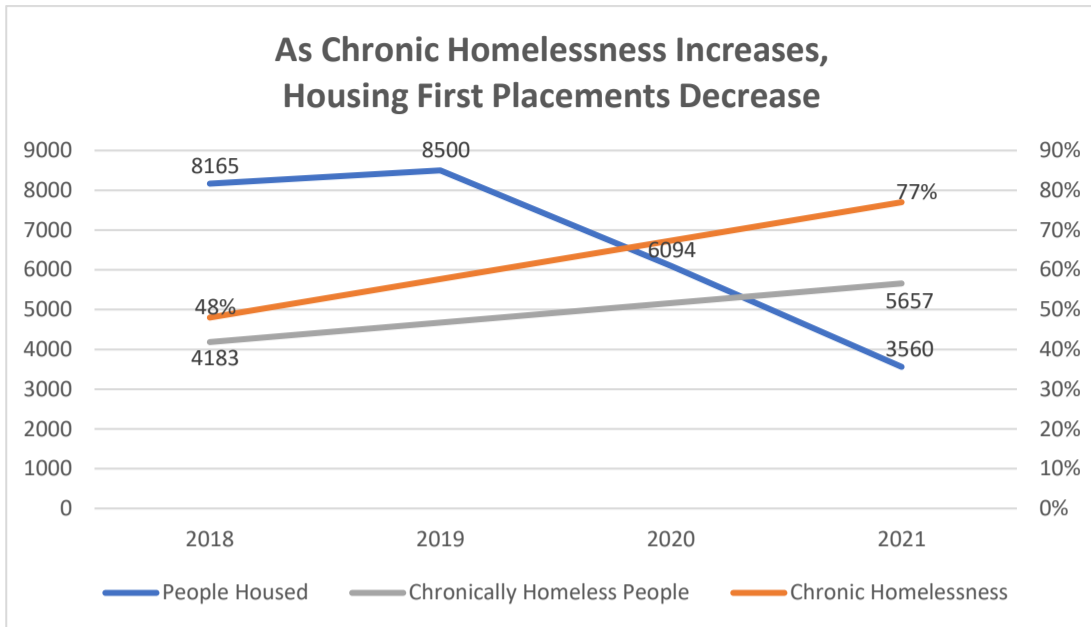
⁴ Shelter & Housing Justice Network, “What Is the City Hiding?,” February 3, 2022, <http://www.shjn.ca/what-is-the-city-hiding/>.

⁵ These specific dates are important because they will make the data exactly comparable to a previous study; see: Factcheck Toronto, “Claim: The City of Toronto Continually Provides Safe, Inside Space to People Living Outside.,” May 18, 2021, <https://factchecktoronto.ca/2021/05/18/shelter-unavailable/>.

⁶ SSHA attributed this to the decline in refugees in the HSSP but there is no evidence to support this assertion, City of Toronto, “Street Needs Assessment - 2018” (Toronto: City of Toronto, 2018), <https://www.toronto.ca/wp-content/uploads/2018/11/99be-2018-SNA-Results-Report.pdf>; City of Toronto, “Street Needs Assessment - 2021” (Toronto: City of Toronto, 2021), <https://www.toronto.ca/legdocs/mmis/2021/ec/bgrd/backgroundfile-171729.pdf>; City of Toronto, “Homelessness Solutions Service Plan” (Toronto, 2021), <https://www.toronto.ca/legdocs/mmis/2021/ec/bgrd/backgroundfile-171730.pdf>.

⁷ Samantha Beattie, “Only 8% of Encampment Residents Have Made It into Permanent Housing since April 2020, Toronto Data Shows,” *CBC News*, September 12, 2021, <https://www.cbc.ca/news/canada/toronto/toronto-encampment-residents-housing-1.6167173>.

⁸ SSHA, “2022 Budget Notes Shelter, Support and Housing Administration” (Toronto: City of Toronto, 2022), <https://www.toronto.ca/legdocs/mmis/2022/bu/bgrd/backgroundfile-175007.pdf>; SSHA, “2020 Budget Notes Shelter, Support and Housing Administration” (Toronto: City of Toronto, 2020), <https://www.toronto.ca/legdocs/mmis/2020/bu/bgrd/backgroundfile-145468.pdf>.



SSHA makes no concrete commitments to house any of the 3,200 people currently residing in the shelter-hotels.

Indeed, SSHA only states that it can create up to 1,100 spaces in the shelter system by reducing social distancing. Setting aside the reasonableness of this position for now, the math doesn't add up.

This plan also fails to factor in the reality that the shelter system is going in the wrong direction. Last year 4,888 more people entered the system than left it. This year, 284 more people have entered the shelter system and 126 fewer people have been housed than last year at this time – that is to say the City is taking in more people than last year and not doing as good a job as housing them as last year so this number will be higher unless this trend reverses somehow.⁹

Even with 1,100 spaces, 2,200 people from the shelter-hotels have to be moved, in addition to the new people coming into the system. A conservative forecast estimates that there is a deficit of about 4,300 beds with the existing plan – this is not counting the people rendered invisible because they never get a bed in the first place.

Table 2: Conservative Projected Deficit in Shelter Space: May 2023¹⁰

Shelter Spaces	7993
Closure of Better Living Centre	-187
Closure of 1684 Queen E.	-44
SSHA Shelter clients	-9559
Space Deficit	-1797

Shelter-hotel residents	3,200
Space deficit	-1,797
Projected shelter net inflow	2,211
Total	5,411
Social distance spaces	-1,100
Projected Space Deficit	4,311

The math doesn't work.

⁹ City of Toronto, "Shelter System Flow Data," <https://www.toronto.ca/city-government/data-research-maps/research-reports/housing-and-homelessness-research-and-reports/shelter-system-flow-data/>.

¹⁰ This model does not account for an expected increase in refugees over 2021 or outdoor sleepers who have not accessed the shelter system in the past three months.

The math demonstrates that this so-called plan is fundamentally irresponsible. The 3,000 housing units that SSHA discuss is no where near the number of beds that we need, they don't yet exist and SSHA has failed to meet its housing creation goals in the past.¹¹

This plan is irresponsible and endangers people. By removing social distancing, it puts an already vulnerable community at even more heightened risk. Reducing the distance between beds doesn't mean that there is 1.75 meters laterally because people move off their beds. People share eating areas and bathroom areas and 1,100 more people in these spaces dramatically increases the likelihood of infection.

Eviction and Violence

This plan is violent. This plan will lead to the forcible eviction of people. Many of these people have already been forcibly evicted from encampments. Many people in shelter-hotels were coerced into them on the promise of housing that it is becoming ever more apparent will never arrive. And now they will be displaced into congregate settings or forced into the parks where you will criminalize them - where they will be at risk of being beaten by the police again. Many of the people who leave the shelter-hotels will not go into congregate settings. Voting for this plan is a vote to force people into the position of moving into the parks, where they have some more access to services and supports but are more visible and more at risk of criminalization, or into the deep woods, where they have less services and may be at more risk of overdose or violence but are more likely to live in peace from the police.

When I speak of violence, it is important to address SSHA's plan about additional capacity which could be garnered by putting two people in the same room - something called double bunking in the prison system. This has been connected to widespread violence in the prisons. It raises significant alarm bells that SSHA is considering this measure.

Between March 2016 and March 2021 there were over 10,000 incidents of violence in the shelter system.¹² These incidents would have largely occurred in congregate sites. When two strangers or near strangers are put in a small, enclosed space behind what could be a locked door it is a potential recipe for disaster.

What is the plan here? That security maybe down a long corridor and maybe available to respond to someone screams if they hear them? That somebody be moved after they are brutalized if they feel safe enough to report it? Is there a set number of rapes or beatings that is deemed acceptable in order to get extra space out of the shelter-hotels while they're open?

When two people get into a fight in the shelter system both people are often kicked out which means that victims who report abuse that occurs behind closed doors would likely face being sent out into the street. So, is the plan to force people to have to choose between a violence they know in a hotel room and an unknown violence in the street?

What does it say about SSHA and the value that they place on the people that they supposedly care for that they would contemplate this? What does it say about you, Councillors, if you pass it?

Consultation with Residents

SSHA has refused to adequately engage shelter-hotel residence about their fate. They are undergoing a consultation process right now about closing the shelter-hotels and yet they release the plan before that process is over. What does that say about SSHA and its regard for the community? This consultation process, however, does not include, by any adequate measure, shelter-hotel residents.

An annual survey is inadequate in terms of consultation. Consulting with a select committee of "people with lived experienced" who are largely detached from both homelessness and the shelter system That are put forward by an organization that's received funding from SSH a is inadequate. What does it say about SSHA that it refuses to engage in meaningful dialogue with the people whose planned evictions they're bringing forward to you right now? And what does it say about Councillors who support these evictions without ever engaging with those residents themselves or ensuring that staff have?

Fundamentally, this is a housing crisis and the only solution to a housing crisis is housing. It's not affordable housing which is inaccessible to people on social assistance - it is rent geared to income

¹¹ Eg. SSHA General Manager Gord Tanner acknowledged that SSHA would not make its 2021 goal of 1,800 units at the October 2021 ECDC meeting.

¹² FactCheck Toronto, "Claim: People Experiencing Homelessness in Toronto Have Access to Safe, High Quality Emergency Shelter," June 7, 2021, <https://factchecktoronto.ca/2021/06/07/shelter-violence/>.

housing. Those of you who are on the Executive Committee can take action next week to expropriate 214-230 Sherbourne Street so it can be turned into some of the desperately needed rent geared to income housing in the Downtown East End.

We all want to see a city that doesn't need a shelter system the size that it is - or even at all.

But simply closing down large pieces of it and pretending things will work out isn't a plan it's a disaster waiting to happen; it's negligent and it's cruel.

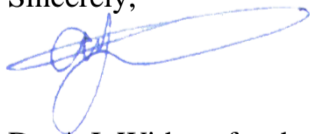
This is the plan we need:

- Shelter, Support and Housing Administration report back in the third quarter and update this Committee:
 1. its progress in meeting its goal of creating the housing units it committed to in the Homelessness Solutions Service Plan and in this report;
 2. the shelter bed deficit;
 3. how many people are being turned away daily (wrap-up code and service queue data);
 4. the specific relocation strategy for each shelter-hotel that may close in the next 120 days, including information about how many times each resident has met with a housing worker and,
 5. the outcome of meaningful consultations with shelter-hotel residents.

This way, this Committee can ensure no shelter-hotels are closed without sufficient safe-guards and human rights protections are in place.

- Keep the shelter-hotels open and take direction from the residents as to where they want to go. Don't close them until the residents have places to go that they deem adequate.
- Improve the quality of shelter-hotels while they are open – based on feedback from residents. The shelter-hotels have been a part of the shelter system for over a decade and have no operating standards.
- Lift the by-law criminalizing camping in parks.
- Expropriate 214-230 Sherbourne St. for RGI housing.
- Eliminate the shelter bed deficit before closing any shelter-hotels. This is the only way that the shelter-hotels can be responsibly closed. This would not even bring the system to the 90% capacity that Council has committed to.
- Build 10,000 units of RGI housing immediately and an additional 5,000 units a year thereafter.

Sincerely,



Dr. A.J. Withers for the Shelter and Housing Justice Network
Adjunct Faculty

Appendix A

Daily Occupancy & Capacity for March 21

March 21, 2022

* Note: The counts at individual warming centres in the Warming Centre – Details section are summed up in the Allied Services section

Occupancy Summary	Individuals				
All Programs, Total	7,812				
Shelter Programs, Family Sector, Total	1,828				
Singles Sector Programs, Total	5,967				
Shelter Programs, Singles, Total	2,565				
Allied Services, Total	377				
COVID-19 Programs, Total	3,025				
COVID-19 Isolation/Recovery Programs	17				
Shelter Programs, Room Based	Individuals	Occupied Rooms	Unoccupied Rooms	Actual Room Capacity	Occupancy Rate
Family Sector, Total	1,828	567	5	572	99.1%
Families, Emergency Shelter Programs	842	256	3	259	98.8%
Families, Transitional Shelter Programs	61	21	2	23	91.3%
Families, Motel/Hotel Programs	925	290	0	290	100.0%
Mixed Adult Motel/Hotel, Total	84	84	0	84	100.0%
Shelter Programs, Bed Based	Individuals	Occupied Beds	Unoccupied Beds	Actual Bed Capacity	Occupancy Rate
Singles Sectors, Total	2,481	2,481	58	2,539	97.7%
Emergency Shelter Programs, Total	1,931	1,931	18	1,949	99.1%
Mixed Adult, Emergency	374	374	1	375	99.7%
Men, Emergency	920	920	4	924	99.6%
Women, Emergency	421	421	3	424	99.3%
Youth, Emergency	216	216	10	226	95.6%
Transitional Shelter Programs, Total	550	550	40	590	93.2%
Mixed Adult, Transitional	115	115	7	122	94.3%
Men, Transitional	175	175	17	192	91.1%
Women, Transitional	98	98	3	101	97.0%
Youth, Transitional	162	162	13	175	92.6%
Allied Services	Individuals	Occupied Spaces	Unoccupied Spaces	Actual Space Capacity	Occupancy Rate
Allied Services, Total	377	377	8	385	97.9%
24-Hour Respite	210	210	2	212	99.1%
24-Hour Women's Drop-ins	62	62	1	63	98.4%
Warming Centres	105	105	5	110	95.5%
COVID-19 Programs, Bed/space-based	Individuals	Occupied Beds/Spaces	Unoccupied Beds/Spaces	Actual Bed/Space Capacity	Occupancy Rate
24-Hour Temporary Response Sites	226	226	0	226	100.0%
COVID-19 Programs, Room/unit based	Individuals	Occupied Rooms	Unoccupied Rooms	Actual Room Capacity	Occupancy Rate
Hotels	2,799	2,532	19	2,551	99.3%
COVID-19 Isolation/Recovery Programs	Individuals	Occupied Rooms	Unoccupied Rooms	Actual Room Capacity	Occupancy Rate
COVID-19 Isolation/Recovery Programs Combined Total	17	15	59	74	20.3%
Warming Centres – Details	Individuals	Occupied Beds/Spaces	Unoccupied Beds/Spaces	Actual Bed/Space Capacity	Occupancy Rate
129 Peter Street – Warming Centre	10	10	5	15	66.7%
Better Living Centre – Warming Centre	35	35	0	35	100.0%
5800 Yonge Street – Warming Centre	60	60	0	60	100.0%
Scarborough Civic Centre – Warming Centre*	0	0	0	0	n/a

* This program is on occasion hosted at other locations