

Housing Rights Advisory Committee – Supporting Unhoused Rights Holders Working Group Feedback on TSSS’s Development of a Shelter Safety Action Plan

The City of Toronto’s Shelter and Support Services division is currently developing a Shelter Safety Action Plan, which will be a key document outlining initiatives and areas of focus to promote and ensure safety for both staff and shelter residents.

Below is a summary of discussion and consideration from the working group regarding the development of a Shelter Safety Action Plan as presented to the Housing Rights Advisory Committee on September 23, 2024.

Shelter residents and unhoused individuals are rights holders and the City of Toronto has a duty to ensure the realization of their housing dignity. This requires adherence to the key principles of the right to adequate housing including participation of rights holders in the development and implementation of the plan, non-discrimination, accountability, and transparency.

Non-discrimination

Non-discrimination is a core element of the human right to adequate housing. Residents experiencing housing precarity and requiring the support of the shelter system may be experiencing various intersecting barriers in their lives, and their experience within or returning to the shelter system must not be stigmatized. Non-discrimination is also a concern with regards to who cannot access the shelter system. Shelter accessibility has multiple links to shelter safety for unhoused people, many of whom experience one or more disabilities including visible, invisible, episodic, mental health, sensory, etc. Accessibility related to physical spaces, policies, client services and crisis management are some key areas of shelter operations we know may impact some disabled clients’ safety and vulnerability risk. It is essential that non-discrimination is a foremost priority for all shelter access and services, particularly a shelter safety action plan, so that residents of shelters can experience housing dignity in this context.

Treatment of Rights Holders Within Shelters

The only mechanism for accountability of shelter staff within the shelter system is for residents to file complaints, which are rarely addressed or followed up on. There is also an implicit vulnerability for a shelter resident to make a complaint about staff who have authority over their tenure at the shelter. Shelter residents are often hesitant to file complaints due to the underlying fear of an eviction from the shelter.

Feedback

- The complaint process within shelters should be redesigned to ensure that residents who make complaints are kept confidential and protected from repercussions that may result from filing a complaint.
- Consider strategies to improve accountability and transparency throughout the complaints process, including having City staff follow up with residents who have filed complaints and offering trauma-informed mediation.

Security of Tenure

Pervasive within the City-run shelters is the threat of temporary or permanent service restriction from the shelter program by shelter staff for procedural infractions, which ultimately is eviction from their current shelter. Shelter residents often live in fear of eviction and may not understand their grounds for eviction.

Feedback

- Guided by a human rights analysis, Toronto Shelters should consider reviewing and improving practices for implementing shelter resident guidelines, particularly those related to service restrictions and staff training. This may include establishing more consistent and accountable processes for using service restrictions, fostering a more collaborative relationship between shelter staff and shelter residents, and exploring the use of more specialized supports for people with histories of trauma and histories of violence.

Staff Training

Staff training is critical to ensuring shelter safety. Despite trainings received by shelter staff, there appears to be gaps in the application of this training during incidents or disputes within shelters. The experience of homelessness may further compound the trauma experienced by shelter residents in these instances.

Feedback

- Shelter staff and personnel should receive adequate, actionable, and ongoing training on applying both a trauma-informed and a human rights-based approach to housing consistent across all shelters. An acute understanding of applying a trauma-informed approach can mitigate infractions and promote shared understandings between shelter residents and staff. Follow up is also necessary to ensure that staff and personnel are applying these skills and have acquired these competencies.

Data and Pathways to Housing

There is concern regarding the adequacy of data collection processes for shelter residents, as well as the quality of supported pathways to housing and matching processes. Providing appropriate and adequate supports to individuals to ensure their ability to thrive in housing placements is a challenge that requires serious consideration.

Feedback:

- TSSS staff should consider looking to non-profit housing providers for best practices in data collection to better support shelter residents, which can be incorporated into City-run shelters. For example, non-profits often collect richer disaggregated data on residents enabling better matching for housing.
- Placements in shelters should consider the capacity and acute needs of rights holders transitioning from sleeping outdoors to shelter beds.
- This may involve exploring the use of more specific supports in certain shelters, such as mental health supports or support for those who use substances. It will also involve TSSS working with other areas in the City to ensure the continuity of housing and other social services.

HRAC welcomes a further consultation as the Shelter Safety Action Plan is drafted, implemented and evaluated, with explicit consideration of human rights outcomes and impacts to rights holders.