

RE: Agenda Item 2024.EC13.18

To the Economic and Community Development Committee,

Just over a year ago today, the City of Toronto declared homelessness an emergency – an important recognition. But recognition of an emergency isn't enough: it requires intelligent policy change, coordinated action, and significant resources to meaningfully address.

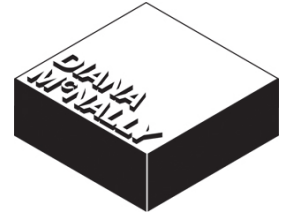
While, as a front-line worker and well-known homelessness advocate, I have often been critical of the City's response – which, we must recognize has, at times, done little to address homelessness while causing significant harm – the City has recently taken some positive steps in the right direction to meet the crisis. These include the Shelter Infrastructure Plan, and the recent adoption of recommendations from a CAMH report on Shelter Safety. And, although it isn't without significant questions and caveats, it also includes the item we are considering today: the updated Interdepartmental Protocol on Encampments.

As one of the progenitors of the human rights approach to encampments that became the basis of the Dufferin Grove Model – which is enshrined in the updated protocol – we saw through this model that time, dedicated resources, and the ability to make informed choices free of coercion made it possible to move people out of parks and into permanent housing. It is so important to enshrine this rights-based approach – which is proven to work – as protocol.

But, at the same time, because Toronto simply does not have the resources to implement the Dufferin Grove Model city-wide, the protocol unfortunately enshrines a two-tier approach, with no clarity as to when or how encampments will be prioritized.

For this reason, and for the protocol to function, it requires resources from other levels of government – especially the province. For this reason, I applaud and support the City in asking for these resources from the Ford government, including further investment in the Canada-Ontario Housing Benefit. In fact, I have just come from a press conference with the Ontario NDP to launch a Private Member's Bill asking for a Homelessness Task Force to help shape a provincial homelessness strategy – something we don't have. I know, like you, that the province must step up, and I will continue to work alongside the City to advocate for provincial resources.

This said, resources from other levels of government are, as we know, not a guarantee; so, I urge the City in considering its process to operationalize this protocol – which I do support – that they reflect on the following, regardless of where other levels of government may fall:



Who defines human rights? This work should not come from the City itself but could potentially fall to the Housing Rights Advisory Committee. There must also be a common understanding of human rights between all departments guided by the protocol.

Similarly, who defines meaningful engagement? How will engagement further inform the process of how the protocol is operationalized? Furthermore, how will people with lived experience, and those who work front-line, continue to shape the protocol as it is developed and implemented? The Poverty Reduction Strategy Office could potentially support stakeholder engagement as the protocol is developed. But, as with the Shelter Safety Report produced by CAMH, which was considered just last month, what mechanism will the City put into place to ensure that people who are or who have been homeless are given meaningful input and control over the services that impact them, including both shelter services and the City's approach to encampments?

Finally, who will continue to monitor the protocol as it is operationalized, to ensure that it remains human rights-compliant? This again requires an arm's length mechanism and ongoing attention – perhaps this could be the purview of the Deputy Ombudsman on Housing.

While I have continued questions about the protocol where I see the potential for harm, at a basic level, this protocol gives us a framework to understand the City's process regarding encampments. Again, I support this.

But as we move forward, I will continue to monitor the protocol as it is operationalized to ensure that the rights of encampment residents – their dignity, in the face of our failure to house them – is both prioritized and upheld.

Sincerely,

Diana Chan McNally
All Saints Toronto