Tuesday, November 26, 2024

Attn: Economic and Community Development Committee
cc: Toronto City Council, Office of the Mayor

re: EC 17.4: Shelter Safety Action Plan and Contract Amendments related to Lodging for Asylum Seekers and Refugees, and Community Safety Team Services

Dear Economic and Community Development Committee Members,

My name is Atia, and I am submitting comments on Agenda Item EC 17.4: the Shelter Safety Action Plan, on behalf of the Shelter & Housing Justice Network (SHJN) as the committee discussing adopting this plan at today's meeting. For context in speaking to "shelter safety," it is important to highlight how shelters are what sociologist Erving Goffman describes as *total institutions*: spaces of control and lack of autonomy. Shelters by nature are inherently carceral and violent.

Important areas of consideration were identified by the Supporting Unhoused Rights Working Group (part of The Housing Rights Advisory Committee), with respect to shelter safety, in their feedback on the TSSS development of a Shelter Safety Action Plan including: *non-discrimination, treatment of rights holders within shelters, security of tenure*, *staff training and data and pathways to housing.*

Many of the recommendations outlined in the Shelter Safety Action Plan fail to address the shelter conditions that inherently contribute to a lack of safety for service users, and contribute to medicalizing, pathologizing and dehumanizing unhoused people who are accessing support. Much of what constitutes "safety" outlined in the plan focuses on notions of safety that decontextualize the shelter conditions from the current escalating housing emergency across the city, province and country. A response to "safety" that does not adequately take into account the unsafe, inhumane and punitive conditions that exist within the shelter system will fail to offer comprehensive and meaningful solutions for unhoused people and workers in these settings.

We are in a housing emergency where people with lived experience have been calling for what's needed for decades. The city must prioritize action that takes the lead from people with lived experience and meaningfully engages representative groups including the Toronto Underhoused & Homeless Union and their current demands: *to give people experiencing homelessness and precarious housing a seat at the table in decision-making; an immediate moratorium on TCHC housing evictions, encampment clearings and service restrictions from hotel programs and congregate shelters; rent subsidies for presently unhoused people; amendments to the affordable housing definition to specify all units must be fully accessible for people with disabilities and built to standards of Universal Design; ensuring that affordable units are safe, clean and pest-free in accordance with RentSafeTO standards*. Meeting these demands is all part of creating shelter safety.

In October 2023, SHJN released a winter plan, a follow-up to a comprehensive report released in 2021 which provided extensive recommendations towards a just, safe and dignified system of shelter and housing within the City of Toronto. There is much work to be done to ensure that shelter

safety includes all service users, especially disabled unhoused people, who are often excluded or not considered when it comes to building, program and service design and delivery.

SHJN has identified four areas that are essential considerations in meaningfully addressing shelter safety, including: *recognition that as institutions, shelters are inherently unsafe; the rights and training of workers; the inaccessibility of shelters for physically disabled unhoused people; there are hundreds of people living outside while shelters remain full.*

Considerations in Shelter Safety

As institutions, shelters are inherently unsafe

For decades, the demand from unhoused people and advocates has always been for housing[1]. Shelters are not designed to be a permanent "solution" that replaces the need for the stability, autonomy and privacy of having a home. Individuals are not meant to live in shelters for prolonged periods, in such poor conditions. People within these systems experience violent and traumatic situations while the conditions for housing "affordability" keep getting worse. The shelter system is a system predicated on paternalistic and harmful ideas of unhoused people rooted in frameworks of charity, capitalism, and dehumanization, which people most impacted by this violence have been calling attention to for years.

Violence within the shelter system is particularly felt for multiply marginalized individuals including Black, Indigenous, and racialized folks, disabled people, refugees, 2SLGTBQIA+, trans and gender-non-conforming people, youth, women, people who use drugs, and people existing at many of these intersections. Individuals from these groups are often disproportionately unhoused[2], and are more likely to "choose" not to, or be unable to, access the shelter system to preserve their own dignity and humanity because of the widespread prevalence of anti-Blackness, anti-Indigeneity, transphobia, xenophobia, ableism, and paternalism steeped into these systems and structures.

Ideas of safety within the system often rely on police, private security and workers to criminalize and disappear people into the so-called justice system or onto the street in the depths of winter. The shelter system has become another mechanism for carcerality, criminalization, policing and punishment, where people are coerced into services, only to be repeatedly displaced[3]. Unhoused people are left with no options and the impossible "choice" of entering a system of control and punishment or staying outside where they risk severe injury, being criminalized, harassed or freezing to death.

Within congregate settings the conditions often ensure the spread of contagious diseases and a lack of privacy and rest. There are often patronizing rules such as curfews, no decision-making power, little autonomy and privacy, the inability to lock one's door, and a reliance on security to enforce rigid and arbitrary rules. For residents, there is no security of tenure, where the power imbalance between shelter staff and residents can result in people being discharged or banned from indoor spaces when there is nowhere else to go. In winter, this is a death sentence.

[1] Greene, J. (May 22, 2015). Urban Restructuring, Homelessness, and Collective Action in Toronto, 1980–2003. Urban History Review, 43(1), Fall 2014: 5-49.
[2] City of Toronto. 2021. "Street Needs Assessment: Results Report."
[3] After Echo Park Lake Research Collective. (2022). Continuum of Carcerality: How Liberal Urbanism Governs Homelessness. *Radical Housing Journal, July 2022 Vol 4*(1): 71-94. https://doi.org/10.54825/CKDY3523.

The rights and training of shelter workers

Workers in the shelter and supportive housing systems are often precariously employed and predominantly marginalized people put in the impossible position of providing services in dehumanizing conditions. They are navigating conditions of working against systemic structures while also being unfairly compensated and not having access to the benefits and training that are essential to their roles. Many workers in this context have experience of high turnover on their teams, immense grief, and having to navigate situations well beyond their scope and capacity while the demands to do more with less resources continue to intensify. There is limited job security, where many shelter workers are contract workers, and the rate of pay is below a living wage: $22-$25 an hour.

Workers must be equipped with tools, training and resources that support the survival of unhoused residents, while recognizing that the current conditions put near impossible constraints on these workers and the relationships they build with people accessing services. These tools include training in de-escalation, in overdose prevention, and in working with individuals across many intersecting identities. There must be opportunities to take direction from people accessing services and for their autonomy and consent to be foundational to services provided. Inadequate training and structural support for staff has tangible consequences and heightens the risk of people being re-traumatized, experiencing violence, harm or death.

The inaccessibility of shelters for physically disabled unhoused people

In the case where shelters might have spaces available, physically disabled unhoused people are often not considered or included in building and service design. The only references to supporting disabled unhoused people in the *Shelter Safety Action Plan* involve exploring "disability supports" without clarity on what this involves. Many physically disabled unhoused people are not able to access shelters, not only because they are full, but because people are literally not able to enter these spaces.

Physically disabled service users of shelter supports have unique needs that must be considered when designing buildings and services, including access to medical care and equipment, personal support workers, and mobility within the space, among others. There must be clarity and standards on what constitutes an "accessible" space that is clearly communicated and identifiable to physically disabled unhoused people. There must be meaningful and accountable consultation processes with physically disabled unhoused people, including the *Toronto Underhoused and Homeless Union's Accessibility Committee,* to ensure that their needs are centred in designing services. Forcing people to choose between maintaining their autonomy and dignity or being able to access an indoor space to survive during winter is unacceptable and furthers the dehumanization and disregard of disabled unhoused people.

There are hundreds of people living outside while shelters remain full

The fact that the shelter system has been operating beyond capacity must be a consideration in addressing shelter safety.The conditions within the shelter system are directly related to the lack of access to safe indoor spaces for people trying to survive while being actively dehumanized. In October, the City's own data[4] indicates that there were at least 225 "unmatched calls" daily to Central

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[4]City of Toronto (2024). Shelter System Requests for Referrals – City of Toronto

Intake, and over [10,000 people experiencing homelessness](#)[5]. These numbers fail to account for people who have given up on the system completely.

While unhoused people try to find any means to survive, we have continued to see ongoing encampment clearings, despite the City allegedly [taking a "human rights approach" to encampments](#)[6]. Unhoused people experience constant police harassment, this is expanding with partnerships like the [Downtown Community Outreach Response and Engagement (CORE) Team](#), a joint effort between Toronto Public Health and Toronto Police Services. Partnerships that continue to be created even as [police violence across the city escalates](#). When systems rely on police and private security to enforce "safety" this increases unhoused peoples' encounters with police and likelihood to enter the criminal justice system, simply for existing or responding to the inhumane nature of structural conditions.

While trying to survive dehumanization, criminalization, abandonment and harassment, people living outside also face extreme weather conditions including cold, rain, freezing temperatures in the winter, and high winds. These elements, without access to safe indoor spaces, increases the risk of severe injury and death in the winter and throughout the year while living outside.

Meaningful Action and Demands

While the housing emergency worsens, meaningful action must involve divesting from policing, surveillance and criminalization of poor, unhoused and marginalized people; resisting gentrification and financialization of housing; and investing in rent-geared-to-income housing, community care and resources that promote life and wellbeing. While harmful structures and systems must continue to be dismantled, the City must ensure that people, in the meantime, have access to the means for survival in life-affirming and life-sustaining conditions.

The shelter and supportive housing system must be equipped to provide individuals with meaningful and dignified access to safe shelter, housing, and responsive and appropriate services to promote survival, health and well-being. The City must commit to implementing meaningful interventions for shelter safety by enacting the following demands:

1. **Drastically improve the conditions of City Shelters**

   a. Ensure city-run facilities meet [Toronto Shelter Standards](#)[7]: including infection-control measures and dignified conditions, enough showers and bathrooms that are accessible, accessible units, proper sleep surfaces (i.e. beds with mattresses), access to appropriate food and meals. Ensure adequate distancing between beds to promote safer conditions and avoid the practice of increasing capacity by placing more beds into existing facilities.

2. **Support shelter workers with the tools, skills and fair compensation**

   a. Make sure they have the resources and tools they need to perform their work and build relationships effectively, including wages and compensation, benefits, supportive conditions, and appropriate training, including de-escalation training from

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[5]City of Toronto (2024). [Shelter System Flow Data](#)
[6]Hui, A. (May 2024). [Toronto to take human-rights-based approach in dealing with homeless encampments - The Globe and Mail](#)
[7] City of Toronto (2022). [Toronto Shelter Standards](#)

an anti-oppressive and trauma-informed framework to create safe conditions for residents and staff.

3. **Guarantee the rights and wellbeing of unhoused people with disabilities**

    a. Engage in meaningful consultation with physically disabled unhoused service users, such as the *Toronto Underhoused & Homeless Union's Accessibility Committee*, to conduct an accessibility audit with accountability measures, and ensure that shelters and respites are physically accessible and follow principles of universal design.

    b. Ensure people with disabilities have access to accessible shelters and respites by building and designing spaces and services in accordance with principles of universal design.

4. **Ensure the safety and wellbeing of people living outside.**

    a. Until adequate shelter space is available, immediately open any available city-owned space to act as low-barrier, year-round, 24-hour respites (i.e. utilize vacant storefronts and community centres) with surge capacity for extreme weather conditions. The need for adequate shelter is year round, not only when temperatures reach -5° C.

    b. Implement a moratorium on shelter bans and encampment evictions. Stop the surveillance, harassment and displacement of unhoused residents and destruction of survival gear. Divest from policing and harassing marginalized communities and invest in providing access to safe shelter and housing.

    c. Immediately stop the closure of shelter-hotels ([like the Delta Shelter Hotel)](#) and implement a moratorium on evictions. Open at least 3,000 additional non-congregate shelter spaces now. Ensure safe and accessible spaces are available for marginalized people with unique needs.

City Council has a responsibility to ensure that all residents have access to safe and accessible emergency shelter. Council must commit to investments in truly affordable housing. The City must act immediately to prevent more deaths and injuries this winter, and implement sustainable, dignified and meaningful long-term solutions that centre unhoused people and their demands. Safe shelter and housing justice for all!

Atia Haq,
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on behalf of Shelter & Housing Justice Network

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