



Dignity and Housing for All: Demanding an End to the Dehumanization of Disabled Unhoused People

*Toronto Underhoused and Homeless Union
Shelter and Housing Justice Network*

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| | |
|---|----|
| Introduction: Framing and contextualizing demands | 3 |
| Updating the context | 3 |
| Recognizing the unique needs of disabled unhoused community members | 4 |
| Accountability statement from SHJN | 5 |
| Integrating disability justice | 5 |
| The impact of multiple mass disabling events | 6 |
| Housing and disability justice on stolen land | 7 |
| Key areas of intervention and demands | 8 |
| Demands to meaningfully address the housing emergency | 8 |
| Ensure disabled unhoused people are effectively included in service design and decision-making | 8 |
| Expand capacity for access to safe indoor spaces | 10 |
| Ensure dignified, humane, and responsive conditions in City services | 11 |
| Promote survival for people sheltering outside (e.g. tents, parks, encampments) | 12 |
| Intervene in the financialization of housing | 12 |
| Implement measures that increase housing security and stability | 13 |
| References | 13 |
| Section 1: Ensure disabled unhoused people are effectively included in service design and decision-making | 16 |
| Ensure disabled unhoused people are effectively included in service design and decision-making | 18 |
| References | 20 |
| Section 2: Expand capacity for safe indoor spaces | 21 |
| The risks of congregate shelter settings as 412 shelter-hotel spots slated to close | 22 |
| Respite Sites | 23 |
| Expand capacity for access to safe indoor spaces | 24 |
| References | 25 |
| Section 3: Ensure dignified, humane, and responsive conditions in City services | 26 |
| The Urgency to Protect Harm Reduction Services Within Shelters | 28 |
| Ensure dignified, humane, and responsive conditions in City services | 29 |
| References | 30 |
| Section 4: Promote survival for people sheltering outside | 32 |
| Survival Shelters Aren't New | 33 |
| Conditions of Survival Shelters | 33 |
| Promote survival for people sheltering outside (e.g. tents, parks, encampments) | 35 |
| References | 35 |
| Section 5: Intervene in the financialization of housing | 37 |
| Intervene in the financialization of housing | 39 |
| References | 39 |
| Section 6: Implement measures that increase housing security and stability | 41 |
| Profit Driven Demovictions and Renovictions | 42 |
| Implement measures that increase housing security and stability | 43 |
| References | 43 |
| Conclusion | 45 |
| Appendix A: Relevant Guidelines and Policies | 46 |
| Appendix B: Emergency Evacuation and Fire Safety Procedures | 46 |
| Appendix C: Previous documents co-authored by SHJN | 46 |

Introduction: Framing and contextualizing demands

Updating the context

While unhoused people navigate survival year-round, the winter season is often when we see the deadliest impacts of dehumanizing policy, rhetoric and decision-making, and the ongoing systemic failures by all levels of government, including the City of Toronto failing to provide access to safe emergency shelter. On October 22, 2024, the City released its [Winter Services Plan for People Experiencing Homelessness](#).¹ In 2023, SHJN presented an [alternate winter plan](#)² to provide recommendations to address the escalating and deadly housing emergency. Over a year later, we remain in an emergency situation and the conditions continue to worsen. The City's current plan remains severely inadequate, continues to leave hundreds of people without shelter and fails to develop sustainable and meaningful solutions to the housing crisis.

The City must urgently address the shortcomings of its attempts to address the housing and homelessness emergency and invest in meaningful interventions, or the situation faced by unhoused people across Toronto will become even more dangerous and deadly. There is an urgent need to implement creative and sustainable solutions that extend beyond measures attached to inclement weather. The housing emergency is year-round, and is escalating across the province. A recent report indicates an estimated 81,515 people were unhoused in the province in 2024.³ In Toronto in 2023, a total of 150 unhoused people died⁴ and at least 7 unhoused people have died since the release date of the City's winter services plan.⁵ In a city with a budget the size of the City of Toronto's, this is neither acceptable nor inevitable. This emergency is a direct result of reckless and murderous social policies. Unhoused people, advocates and researchers have been sounding the alarm for decades about a system in crisis.

In November 2024, the [City's own data](#) indicated that there were at least 192 "unmatched calls" every day to Central Intake—these are people calling to access shelter and who are turned away because there isn't any.⁶ These calls represent individuals facing a daily life or death situation and who are trying to survive ongoing displacement, dehumanization, and organized abandonment.⁷ Many more people in need of shelter have simply given up trying to find an indoor space after being turned away over and over again.

Since the release of previous reports, winter plans, and open letters co-authored by Shelter & Housing Justice Network [see [Appendix C](#) for examples], we have seen an intensifying weaponization of policy,⁸ including the notwithstanding clause, to further disenfranchise people; abysmally low social assistance rates that fail to constitute a living wage; and escalating violent and hateful rhetoric towards many marginalized groups. What were threats last year have

¹ City of Toronto (2023). [Winter Services Plan for People Experiencing Homelessness](#).

² Shelter & Housing Justice Network (2023). [SHJN Winter Plan: Responding to a deadly housing emergency](#).

³ Association of Municipalities of Ontario. (2025). [Municipalities Under Pressure: The Human Cost of Ontario's Homelessness Crisis](#).

⁴ Toronto Public Health. (2023) [Deaths of People Experiencing Homelessness | Tableau Public](#)

⁵ Toronto Homeless Memorial Network (2024) <http://homelessmemorials.com/memorial/>

⁶ City of Toronto (2023). [Shelter System Requests for Referrals – City of Toronto](#)

⁷ Ruth Wilson Gilmore. (Oct 2022). [Death Panel Podcast: Organized abandonment with Ruth Wilson Gilmore](#).

⁸ *Examples of violent legislation include Bill 223: Safer Streets, Stronger Communities Act, which will result in the closure of safe supply, overdose prevention and harm reduction services across the province, under the guise of community safety and Bill 242: Safer Municipalities Act, which threatens people using drugs while sheltering outside with being ticketed, fined or incarcerated.*

escalated to a systematic dismantling of life-saving services through attacks on supervised consumption sites, safe supply programs, and the targeting of people living outside in survival shelters. This violence disproportionately impacts marginalized unhoused community members, including disabled people (with both visible and invisible disabilities), Indigenous and Black people, migrants and refugees, trans and queer people, women, youth, people who use drugs, and many other groups who continue to be shut out of the shelter and housing systems. This is a continuation of the organized abandonment and social murder that is legislated into policy decisions and state violence.

Recognizing the unique needs of disabled unhoused community members

This organized abandonment is particularly experienced by disabled unhoused community members, who are often unable to access the programs, services and supports they need to survive and who are generally excluded from the consultation, decision-making and planning processes. Solutions rooted in the paternalistic, carceral (or prison-like) and ableist frameworks that drive the current shelter and housing systems without facilitating the self-determination of people most impacted, including disabled houseless people, will always result in further harm.⁹ Systems that strip people of their self-determination, autonomy, and agency in the name of “access” are not just. Survival in winter, or any time of year, should not come at the cost of dehumanization. There can be no housing justice without disability justice. This document provides context to the state of the emergency experienced by disabled unhoused and underhoused people and integrates a disability justice framework into our demands for safe shelter and housing for all.

The City’s [Street Needs Assessment from 2021](#) indicated that a high number of unhoused respondents were experiencing an *illness or medical condition* (32%), *physical limitations* (26%) or *learning or cognitive limitations* (27%) and being on *Ontario Disability Support Program* (30%) or *Ontario Works* (30%).¹⁰ Data show that the number of unhoused OW and ODSP recipients has almost doubled in the last two years.¹¹ Despite evidence indicating that a growing number of disabled people are becoming unhoused, people with disabilities are not considered a “priority group” within the City’s [Coordinated Access](#)¹² approach to housing and supports, an example of the ongoing erasure and disregard for disabled unhoused people within these systems. This year, 2025, was meant to be the year the barrier-free province promised 20 years ago by the Ontario legislature¹³ through the Accessibility for Ontarians with Disabilities Act was to be achieved; however, the reality indicates we are nowhere near this goal,¹⁴ especially when it comes to changing the material conditions for disabled unhoused and underhoused people.

⁹ Fitzsimmons, Brynn (2022) "Storying Access: Citizen Journalism, Disability Justice, and the Kansas City Homeless Union" *Community Literacy Journal*, 17(1). DOI: 10.25148/CLJ.17.1.010644 Available at: <https://digitalcommons.fiu.edu/communityliteracy/vol17/iss1/4>

¹⁰ City of Toronto. (2021) [Street Needs Assessment Results Report](#)

¹¹ Pinkerton & Hauen (Sept 26 2024). [Number of homeless OW, ODSP recipients has almost doubled in two years: government data](#). The Trillium.

¹² City of Toronto. [Coordinated Access to Housing & Supports](#)

¹³ Government of Ontario. (June 3, 2015) [The Path to 2025: Ontario's Accessibility Action Plan](#)

¹⁴ AODA Alliance (2025). [2025 Has Arrived! Where is the Barrier-Free Society that the Ontario Legislature Unanimously Promised Ontarians with Disabilities Twenty Years Ago?](#)

Disabled people are disproportionately impacted by the housing emergency while often simultaneously navigating the disabling contexts of poverty, incarceration, environment, violence, and barriers to healthcare access.¹⁵ Living and trying to survive in an inaccessible unit or space while having to constantly cycle through debilitating processes to fight for one's basic needs to be met and for one's humanity to be respected is an exhausting and dehumanizing experience that exacerbates people's disabilities. Because of the inaccessibility of many shelters, respites, and rent-geared-to income or supportive housing units, disabled people are constantly faced with barriers to surviving inhumane conditions and to finding stable housing.¹⁶

Accountability statement from SHJN

The insidious and overt intersections of ableism, capitalism and colonialism mean that often when making demands to address the housing emergency, disabled unhoused people continue to be excluded or shut out of the conversation, demonstrated in SHJN's 2023 [Winter Plan: Responding to a deadly housing emergency](#). As a group, SHJN generously received feedback that even if all the demands presented in this plan were implemented, this would not necessarily change the material conditions for physically disabled unhoused people. The process of revising this document through collaboration, ongoing learning, and building relationships is part of SHJN's commitment to accountability as we acknowledge our complicity while working towards remedying this harm. This alternate plan, to emphasize the importance of centering and meaningfully including disabled unhoused people, has been developed in collaboration and consultation with the Toronto Underhoused and Homeless Union's Accessibility Committee. We would like to extend our gratitude to the members of TUHU's Accessibility Committee who supported the work of this project through their research, storytelling, writing, consultation and feedback, including; Lynn M. Walker, Asil L, Jennifer Jewell, Saleh Sheikh.

Integrating disability justice

We have sought to ground the creation and revisions of this proposed plan in the [10 Principles of Disability Justice](#)¹⁷ developed by the disability justice project, Sins Invalid, including: intersectionality, leadership of the most impacted, an anti-capitalist politic, commitment to cross-movement organizing, recognizing wholeness, sustainability, commitment to cross-disability solidarity, interdependence, collective access, and collective liberation. While we do this work, we recognize that a system upheld by the State cannot be a "just" system, that people are legislated into poverty and forced into programs and services that operate from a carceral, punitive and paternalistic framework, labelled as "care." We know that the people who rely on these systems deserve to live, survive and thrive with dignity and autonomy. This document outlines demands within these systems and highlights what can be implemented to create conditions for people to survive, while recognizing the importance of building meaningful alternatives outside of state control.

¹⁵ Chin, Natalie M., Centering Disability Justice (November 9, 2021). 71 Syracuse Law Review 683 (2021), Available at SSRN: <https://ssrn.com/abstract=3959992>

¹⁶ Luke Reid (March 31, 2022). [Issues for Persons with Disabilities: Security of Tenure in Canada](#). Office of the Federal Housing Advocate, Canadian Human Rights Commission.

¹⁷ Sins Invalid. (2015) [10 Principles of Disability Justice](#)

This document is a starting point, created in collaboration with a small group of people who have been directly impacted by the violence, disregard, and dehumanization of the shelter and housing systems. Ultimately, all disabled unhoused people should have input and influence over building a system that meets and is responsive to their needs. Experiences of disability can be complex and unique in so many ways. Disability is dynamic, and can be both visible and invisible. We recognize that in developing this document we will not capture the specific needs for every type of disability people experience. We hope to highlight the ongoing erasure and exclusion of physically disabled unhoused and underhoused people, identify the ways that disability impacts people's lives and interactions with state systems, and emphasize the need for mechanisms of feedback that are meaningfully considered and integrated into program and service design and delivery.

This report and the demands within it are an invitation for critical thinking and questioning to ensure that groups of people are not excluded from life-sustaining services and programs. It is important to listen to and be accountable to feedback provided by disabled people, including disabled unhoused people, especially individuals who are multiply marginalized by intersecting systems of oppression.

The impact of multiple mass disabling events

Integrating a disability justice framework is especially important in a time of multiple mass disabling events. There are deep connections between the ongoing and systemic violences of colonialism, imperialism, war, state-funded genocides, poverty, incarceration, displacement and houselessness, and the ways that these systems both disable people, and then blame them for not being able to access systems designed to render people disposable.^{18,19} Settler colonialism and ableism are deeply intertwined, as the State dictates who should have access or be included based on their capacity to produce or contribute to a capitalist society.²⁰ These dehumanizing divisions, based on who can "produce" or who "deserves" access are used by the State to justify the logics and violence of elimination, eugenics, exploitation and extraction entrenched in state policies and processes, faced disproportionately by disabled unhoused Indigenous and Black people. The context, geopolitical factors, and state actions, including land theft, displacement, mining, industrial logging, war, and genocide, can be directly disabling of people and groups.^{21,22} We see examples of this in the ongoing mercury poisoning being fought by generations of families on Grassy Narrows First Nation, the overrepresentation of unhoused and incarcerated Indigenous and Black community members in so-called Canada, and in the direct impacts on people's health while living outside in inclement weather including on chronic illness, physical mobility and risk of frostbite.

¹⁸ Kazemi, S (2017). A Step toward a Conceptualization of Transnational Disability: Engaging the Dialectics of Geopolitics, "Third World" and Imperialism. *Critical Disability Discourses*, 8. Retrieved from <https://cdd.journals.yorku.ca/index.php/cdd/article/view/39729>

¹⁹ Destiny Pitters. (Sept 7, 2022). *Disability and war*. *Briarpatch Magazine*.

²⁰ Jaffee, L., Sheehi, L. (2024). Disrupting Fixity: Palestine as Central to Decolonial Disability Justice. *Review of Disability Studies: An International Journal*, 19(3-4). Accessible online: <https://rdsjournal.org/index.php/journal/article/view/1321/2790>

²¹ Kazemi, S (2017). A Step toward a Conceptualization of Transnational Disability: Engaging the Dialectics of Geopolitics, "Third World" and Imperialism. *Critical Disability Discourses*, 8. Retrieved from <https://cdd.journals.yorku.ca/index.php/cdd/article/view/39729>

²² Destiny Pitters. (Sept 7, 2022). *Disability and war*. *Briarpatch Magazine*.

We continue to see City and media narratives deflect accountability and blame refugees for the shelter and housing crisis when in reality, this is a decades-long emergency in the context of a collapsing shelter system and a parasitic housing system where people have nowhere to go because no affordable housing options exist, despite City Council adopting an [Affordable Housing Action Plan](#)²³ in 2009. In Ontario, the number of unhoused people on social assistance has almost doubled in the last two years,²⁴ and as housing costs skyrocket, people with the lowest income will continue to be the most impacted. We know this disproportionately affects disabled people, especially people who experience additional facets of marginalization, because of the many barriers to accessibility, survival and appropriate accommodations that exist within the shelter and subsidized and supportive housing systems. With rising rent and increases in the costs of living, the stagnation of social assistance and service industry wages, the unavailability of truly affordable, accessible, rent-gearred-to-income housing, widespread financialization of housing, and gentrification of neighbourhoods, the factors driving this housing and homelessness emergency are clear.

Housing and disability justice on stolen land

The state-sanctioned violence and trauma of poverty and homelessness all occurs on stolen land, disproportionately impacting communities that have been violently displaced from their own Indigenous homelands, including First Nations people here on Turtle Island, and Black people who were forcibly brought to these lands through the trans-Atlantic slave trade. State complicity in imperial and colonial violence continues to displace people from their lands, in so-called Canada, and around the globe. Disrupting the connection between Indigenous peoples and their lands is central to the historical and ongoing disablement of Indigenous people and communities;²⁵ data indicates higher rates of disability in the context of colonial violence.²⁶ We must reckon with the question of what it means to have housing “justice” on stolen land, deepen our understanding of what it means to have an anti-colonial struggle for housing justice, and ensure that our advocacy and demand for reforms does not legitimize colonial claims to land and space.²⁷ When we speak of self-determination for disabled unhoused people, this must also push us towards understanding what it means to amplify the demands of Indigenous communities and their self-determination and sovereignty. We must recognize that housing “justice” is not possible without the return of land and stolen wealth and the societal hierarchies that preserve and protect colonial power.²⁸ These are all connected, and centering disabled unhoused people, including Indigenous and Black community members, moves us closer to collective liberation, even when we know this will not come from the State. In this

²³ Housing Opportunities Toronto. [An Affordable Housing Action Plan](#). Adopted by Toronto City Council in August 5 2009.

²⁴ Pinkerton & Hauen (Sept 26 2024). [Number of homeless OW, ODSP recipients has almost doubled in two years: government data](#). The Trillium.

²⁵ Jaffee, Laura & John, Kelsey (2018). Disabling Bodies of/and Land: Reframing Disability Justice in Conversation with Indigenous Theory and Activism. *Disability and the Global South*, 5(2), 1407-1429 Available at https://disabilityglobalsouth.files.wordpress.com/2018/08/dgs_05_02_04.

²⁶ Jen Deerinwater. (2021). [Colonial Forces of Environmental Violence on Deaf, Disabled, & Ill Indigenous People](#). *Disability Studies Quarterly*, 41(4).

²⁷ Carlson, Anna; Osborne, Natalie; Sriranganathan, Jonathan; Chan, Mo. (16 Jul 2024): “The rent is too damn high” meets “pay the rent”: practising solidarity with the dispossessed”, *International Journal of Housing Policy*, DOI: 10.1080/19491247.2024.2367837 Retrieved from: <https://doi.org/10.1080/19491247.2024.2367837>

²⁸ Ibid.

document, we highlight the demands connected to moving these systems closer to housing justice: tangible asks that either in the short-term or long-term can materially change the conditions for disabled unhoused and underhoused people in this city.

Key areas of intervention and demands

The City must implement creative solutions in collaboration with and guided by people with lived experience who are most impacted by this emergency, including disabled people. City Council must use all of the tools at their disposal to remedy the crisis situation they inherited from years of socially murderous²⁹ policies and complete disregard for the humanity of unhoused people. To uphold the rights of all its residents and fight the dehumanization that allows people to die on the streets of this city, Council must engage in fierce and unrelenting advocacy for provincial and federal government intervention; divest from systems of policing, surveillance and criminalization and invest in community supports; and prioritize the wellbeing of people over profits through disrupting the negative impacts of financialization and gentrification.

The City must ensure that unhoused people survive with dignity and humanity. This report highlights six areas where ongoing action is needed for the City to meaningfully address the housing and homelessness emergency, through immediate and long-term interventions that 1) ensure disabled unhoused people are effectively included in service design and decision-making; 2) expand capacity for safe indoor spaces; 3) ensure dignified, humane, and responsive conditions in City services; 3) promote survival for people sheltering outside (e.g. tents, parks, encampments); 4) intervene in the financialization of housing; and 5) implement measures that increase housing security and stability. Each section details the current state of the emergency and associated demands for the City to demonstrate investments in dignity, shelter and housing for all.

Demands to meaningfully address the housing emergency

Ensure disabled unhoused people **can access to public programs, services, shelter and housing and** are effectively included in service design and decision-making

- 1) Ensure that disabled people can access all Toronto Shelter and Support Services programs, including shelters and respite as per the City of Toronto's [Accessibility Design Guidelines](#) and [Shelter Design & Technical Guidelines](#). Centre disabled people in decision making and program and service design. Create mechanisms for feedback that are responsive and accountable to the concerns of disabled service users. Collect this feedback in a centralized database to ensure system-wide accountability to create more accessible processes, programs and services.
- 2) Update the City of Toronto's definition of "accessible" to align with definitions of accessibility that support disabled people's **ability** to live their lives with dignity and self-determination, and adheres to recommended guidelines and existing or expectant

²⁹ Medvedyuk, Govender, Raphael. (2021). [The reemergence of Engels' concept of social murder in response to growing social and health inequalities](https://doi.org/10.1016/j.socscimed.2021.114377). *Social Science & Medicine*, 289. <https://doi.org/10.1016/j.socscimed.2021.114377>

legislation including: [the United Nations Convention on the Rights for Persons with Disabilities](#); [Ontario Human Rights Code](#); [Toronto Accessibility Design Guidelines](#), [Shelter Design and Technical Guidelines](#); [Toronto Housing Charter](#); [Access Toronto policy](#); [Toronto Shelter Standards](#); [Toronto Community Housing Accessibility Policy](#); and [Accessibility for Ontarians with Disability Act Standards in Housing \(Appendix A\)](#).

- 3) Ensure a ~~minimum baseline~~ level of accessibility for all units in shelters, housing and respites that includes useability for wheelchair users. ~~Build according to universal design with adaptability, especially in new buildings, for ease of future modifications. In new development and renovations, apply universal design with adaptability for ease of future modifications.~~
- 4) Set annual targets for accessible units and shelter beds alongside targets for affordable, RGI and rent controlled units, award funding and incentives to projects that will achieve these targets, and report on progress in meeting these targets at regular intervals. ~~Ensure the City's Budget is reflective of these guidelines by allocating funds to build and modify units to be accessible according to these standards. ¶~~
- 5) ~~Ensure transparency, communication and accessibility of information: Conduct an accessibility audit of program sites and shelter and housing processes in collaboration with disabled service users, develop a global rating system, and make detailed information about accessibility available at Central Intake or on the City of Toronto website to support people to make informed decisions based on their specific access needs. Develop and implement plans for improving accessibility across the system, including allocation of funds in the City's Budget to operationalize these plans.~~
- 6) Collect meaningful data around (in)accessibility within the sector. Publicize the number of City-owned accessible units, and the number of people with disabilities accessing the shelter and subsidized or supportive housing systems. Include data on the number of people who are unable to access the shelter system due to inaccessible spaces.
- 7) Equip staff with tools, resources and training required to effectively support disabled service users, including ~~training~~ anti-oppression training with a focus on ableism and intersectionality, support to help disabled people with system navigation pieces (e.g. accessing assistive devices through the [assistive devices program](#), coordinating medical care); and emergency evacuation procedures. Advocate for additional funding and resources to ensure that shelters and subsidized or supportive housing programs do this effectively, in accordance with existing standards, legislation, and the strategies referenced in this document.
- 8) Ensure disabled people are not removed from their networks of care (i.e. medical care and other supports), which can be location-specific. Ensure disabled people have access to/are not denied care they require through lifting arbitrary restrictions around access to medical treatments, accommodations, meals, personal support workers, professionals, friends and community members who offer life-sustaining care provision. People have the right to their own medical care in shelters and supportive housing units

and providers must not be allowed to deny people's access needs. Provide specific programming and supports for disabled service users within these systems.

- 9) Ensure disabled people are not penalized for turning down housing options that are not accessible to them on the subsidized housing waitlist.
- 10) Meaningfully include and consult with disabled people in emergency evacuation planning and procedures. Create individualized fire safety and emergency evacuation procedures and plans for disabled people who may require assistance in an emergency as mandated by the Ontario Fire Code ([Section 2.8.2](#)),³⁰ including methods of communication that are standardized into a consensual and comprehensive intake process. Draw from existing examples of effective emergency evacuation procedures for people requiring assistance [see [Appendix B](#)]. Ensure people with disabilities are not asked to or expected to engage in unsafe and inaccessible evacuation procedures.
- 11) Implement measures to ensure that staff are trained on safety and evacuation equipment and processes, and that there are supervisory staff available to oversee and implement emergency procedures, as per Ontario Fire Code ([Section 2.8.2](#))³¹ and the City's own policies.³² Prioritize the lowest floors within shelters, subsidized and supportive housing programs for people with disabilities and medical issues. In emergency situations, ensure disabled people who need support are not left behind until it is too late to evacuate safely.
- 12) Develop inclement weather plans for ensuring timely snow removal processes to ensure accessibility in and out of buildings.
- 13) Remove technological, financial, and physical barriers to accessing shelter and rent-geared-to-income housing. Housing and shelter access systems that require continuous or regular access to a cell phone and cell phone service, a computer with internet access, and/or technological literacy disproportionately impact people with disabilities and make it even more difficult for them to access shelter and housing.

Expand capacity ~~of~~ access to safe indoor spaces

- 14) Until adequate shelter space is available, immediately shift operations of "warming centres" to act as low-barrier, year-round, 24-hour respites with surge capacity for extreme weather conditions. The need for adequate shelter and safe indoor spaces is year-round and ongoing during winter, not only when temperatures reach -5° C, -15° C or other arbitrary numbers. Ensure that an additional \$50 million from Toronto's 2025/2026 budget is earmarked to make this happen.

³⁰ Ontario Fire Code: [O. Reg. 213/07: FIRE CODE](#) Retrieved from: <https://www.ontario.ca/laws/regulation/070213>

³¹ Ontario Fire Code: [O. Reg. 213/07: FIRE CODE](#) Retrieved from: <https://www.ontario.ca/laws/regulation/070213>

³² City of Toronto. [Fire and Evacuation](#). Approved Feb 2, 2009; re-endorsed December 8, 2022.

- 15) Ensure City-run facilities meet [Toronto Shelter Standards](#)³³ and [Shelter Design and Technical Guidelines](#)³⁴ including: adherence to accessible design guidelines, infection-control measures and dignified conditions, enough accessible showers and bathrooms that are usable to wheelchair users, proper sleep surfaces, and access to appropriate food and meals. Ensure over two metres between beds to promote safer conditions, accessibility for people using mobility devices (e.g. wheelchairs, scooters), and to avoid the practice of “increasing” capacity by placing more beds into existing facilities. Ensure timely repairs, better beds, and addressing pest infestations.
- 16) As per the [City of Toronto Shelter Design and Technical Guidelines](#),³⁵ immediately ensure at least 20% of spaces in the emergency shelter system are accessible to and usable for disabled unhoused people, including wheelchair users. Develop a plan to increase this to at least 40% over the next five years, to affirm the City’s commitment to accessibility, referenced in the [Multi-Year Accessibility Plan](#),³⁶ including allocating funds in the City’s Budget to operationalize this goal.
- 17) Ensure safe and accessible spaces are available for marginalized people with unique needs, including physically disabled people whose needs are not currently being met within the shelter and subsidized and supportive housing systems. Improve people’s ability to safely reach accessible respite sites in winter by ensuring they are closer to accessible public transit. Increase the number of accessible respites and spaces in the winter to ensure that people are not forced to travel around an inaccessible city only to realize they are not able to get through the doors. Maintain accessible pathways, entrances, signage, and other features to ensure unhoused individuals with disabilities can move freely and access services without additional barriers.
- 18) Immediately stop the closure of shelter-hotels and implement a moratorium on evictions and shelter bans. During cold weather alerts, suspend any sanctions on clients who have been barred or suspended from services. In inclement weather, this is a matter of life and death.
- 19)
- 20) Advocate for the provincial and federal governments to each fund at least 4500 rent supplements to address the number of people experiencing homelessness.

Ensure dignified, humane, and responsive conditions in City services

- 21) Convene an emergency task force including federal and provincial governments, frontline workers and people with lived experience of being unhoused, such as the [Toronto Underhoused & Homeless Union](#), including people with disabilities, to coordinate a response to the ongoing shelter and housing crisis in Toronto. Ensure meaningful engagement and accountability to the recommendations provided. Ensure groups

³³ City of Toronto (2022). [Toronto Shelter Standards](#)

³⁴ Hilditch Architect Inc (2020). [City of Toronto Shelter Design and Technical Guidelines](#)

³⁵ Ibid.

³⁶ City of Toronto. [Multi-Year Accessibility Plan 2020-2024](#). Approved by City Council December 2019.

consulting on the housing emergency situation with the City of Toronto are not benefiting from financialization and gentrification.

- 22) Collaborate with shelter and housing workers, advocates and people with lived experience (such as the [Toronto Underhoused & Homeless Union](#)), to ensure staff have the resources to perform their work and build relationships effectively, including fair wages and benefits, supportive conditions, and appropriate training, including de-escalation training from an anti-oppressive, trauma-informed framework to create safer conditions for residents and staff.
- 23) Ensure full staffing of any City-run shelter and respite services with appropriately trained staff and relevant resources, including but not limited to: harm reduction services and supplies, mental health supports, grief supports, immigration and settlement services, access to interpretation and translation services as needed, effective supports for residents with disabilities, hot meal services, housing workers skilled in advocacy around accommodations and unique needs, and wi-fi.
- 24) Publicly fight against provincial legislation including [Bill 223: Safer Streets, Stronger Communities Act](#) and work to protect the continued operations of all safe supply, overdose prevention and harm reduction services within shelters. Expand overdose prevention, education, training and response, and ensure continued implementation and accountability to the recommendations of the [Toronto Shelter-Hotel Overdose Preparedness Assessment Project](#).³⁷
- 25) Adopt the recommendations from the [Office of the Ombudsman report: An Investigation into the City's Decision to Stop Allowing Refugee Claimants into Base Shelter System Beds](#). Ensure that access to safe emergency shelter is never restricted based on immigration status or other facets of identity, through discriminatory and dehumanizing policy decisions in accordance with existing City policies, including the [Toronto Housing Charter](#), [Access Toronto policy](#) and [Toronto Shelter Standards](#). Make commitments to improve and clarify processes, train staff on anti-Black racism, meaningfully consult with impacted communities and experts, and strengthen accountability through implementation of the 14 recommendations identified.
- 26) ~~Implement a moratorium on shelter bans. During cold weather alerts, suspend any sanctions on clients who have been barred or suspended from services. In inclement weather, this is a matter of life and death.~~^{ff}

Promote survival for people sheltering outside (e.g. tents, parks, encampments)

- 27) Implement a moratorium on encampment clearings and stop the harassment of residents and destruction of survival gear. Immediately stop stealing and damaging people's assistive and mobility devices (e.g. wheelchairs, scooters), life-sustaining medication and supplies,[;] and stop displacing people away from their access to medical

³⁷ Toronto Shelter-Hotel Overdose Action Task Force. "[Toronto Shelter-Hotel Overdose Preparedness Assessment Project Final Report and Recommendations](#)." Toronto, 2021.

care, community and **means of** survival. Divest the additional \$10.6 million allocated to displacing, policing and harassing marginalized communities in this year's operating budget and invest these funds into building accessible rent-geared-to-income housing. Uphold guiding principles cited in the City's [Interdivisional Protocol for Encampments](#) including a human rights, trauma-informed approach that maintains dignity and compassion, is responsive to **people's** needs, and involves people in decision-making about their lives. As threats from the provincial government escalate through the proposed [Bill 242: Safer Municipalities Act](#), the City must fight for the wellbeing of its residents living outside who have nowhere to exist safely.

- 28) Given the escalating emergency situation, immediately ~~dedicate~~**activate** funds to ~~providing for~~ necessary services that promote survival for people living outside ~~in survival shelters (e.g. tents)~~ including: harm reduction, accessible non-congregate shelter spaces, survival supplies (e.g. sleeping bags, safe heat sources, tents) as well as access to toilets, showers and clean drinking water. Ensure these services are universally accessible.

Intervene in the financialization of housing

- 29) Advocate for the provincial and federal governments to build rent geared-to-income (RGI) social housing in Toronto: 10,000 units immediately to address homelessness and 90,000 units to address the growing waitlist. Ensure that 50% of these units are built to be accessible and usable ~~by~~**to** disabled people including wheelchair users; to address the systematic exclusion of disabled unhoused people from housing options. Dedicate funds in the City's Budget to building accessible units and modifying existing City-owned housing to be usable ~~by~~**for** people with disabilities, including wheelchair users.
- 30) Intervene in the negative impacts of financialization of the housing market through measures including expropriation of properties for RGI housing, including 214-230 Sherbourne Street, prohibitive vacant unit and land transfer taxes and implementing requirements for rent-geared-to-income rental units in all new builds.
- 31) Impose limits on the number of properties held by single investors and prevent financialized landlords from buying affordable housing. Ensure transparency and enact limits on corporate landlords evidenced to violate tenant rights, and eliminate tax incentives and subsidies to corporate landlords where investments do not meet housing needs. Preserve social, non-profit, and co-op housing while increasing non-market housing units.

Implement measures that increase housing security and stability

- 32) Ensure that all housing built, especially on government-owned land, is fully accessible in accordance with principles of universal design, meets the affordable housing definition (i.e. 30% of gross household income) and is truly affordable to recipients of Ontario Works, Ontario Disability Support Program, Old Age Security, and people receiving monthly incomes from minimum-wage jobs.

- 33) Advocate for the provincial and federal governments to increase social assistance rates to respond to the worsening homelessness and housing emergency, and increasingly ~~unaffordable~~ costs of living, as has been implemented in other emergency situations (e.g. CERB, which was \$2000).
- 34) Advocate for the provincial government to: enact a rent freeze/~~set the provincial annual guideline increase to 0%~~, enact vacancy ~~control~~ rent control ~~for, apply rent controls to~~ all rental units including new rentals built after November 2018; and eliminate above-guideline-increases for rent.
- 35) Impose a moratorium on demolitions of rental units, ~~viction applications, including pre-construction applications and those that have been approved by City Council.~~
- 36) ~~City Council must ensure that all residents have access to safe and accessible emergency shelter. Council must commit to investments in truly affordable and accessible housing. The City must act immediately to prevent more deaths and injuries of unhoused people this year, and must invest in meaningful long-term solutions to homelessness that are sustainable, dignified and humane. Safe shelter and housing justice for all!~~

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Section 1: Ensure disabled unhoused people are effectively included in service design and decision-making

The experiences of unhoused people with disabilities are continuously disregarded, ignored and erased, furthering the dehumanization faced by disabled people. This has dangerous consequences and in the context of shelter and housing, results in people literally being shut out of services, programs and systems. People are at times unable to physically access a program or service and the lack of regard for the unique needs of disabled people often results in mistreatment and denial of people's basic human rights.

Physically disabled people navigating the shelter and subsidized or supportive housing systems have spoken of experiences of being left behind in fires and emergency situations; told to walk down the stairs when physically unable to do so; denied access to medical treatments, equipment and care personnel to help them with daily tasks because of arbitrary rules; had their assistive devices confiscated, damaged or thrown away during violent survival shelter clearings; had their fridges taken away because of a lack of support for some residents to keep these clean; and been unable to engage with the world meaningfully because of the energy it takes or the impossibility of leaving their building because of barriers such as narrow doorways or heavy doors that make maneuvering mobility devices (e.g. scooters, wheelchairs) extremely challenging. Often when equipment exists to make things more accessible, such as elevators, lifts and automatic doors, these are not operational for weeks at a time.

The [City of Toronto's Street Needs Assessment](#) highlights that disabled people make up a significant portion of the unhoused population.³⁸ Yet, many shelters do not adequately address the needs of wheelchair users and those using/needing mobility devices including scooters. For disabled service users, it can be difficult to obtain the necessary information through calling the Central Intake line to access a shelter space. Does the shelter have wheelchair accessible bathrooms and/or showering facilities? Will people's medical care professionals (including personal support workers) be allowed entry into the shelter or will this be denied? Do case workers provide logistical and advocacy support for their disabled clients in getting the mobility devices they need (e.g. through the provincial [Assistive Devices Program](#))? On the City of Toronto's website, accessibility information is only available for warming centres, and not other facilities, such as respite or shelters. When this information is not readily available, disabled unhoused people encounter barriers to accessing services or required to expend energy only to reach a program that they are not able to use.

The Ontario Building Code indicates that at least 15% of suites in a multi-unit residential building must be designed with "basic" accessibility features, defined as a unit that is "visitable" meaning a path of travel for someone using a mobility device into and around the unit and an accessible washroom.³⁹ True accessibility means much more than being able to enter a space, and areas of accommodations in housing might include: mobility, height, visual and auditory perception, sensory sensitivity, chemical sensitivity, and chronic illness and immunosuppression, as well as

³⁸ City of Toronto. (2021) [Street Needs Assessment Results Report](#)

³⁹ Government of Ontario. (December 3, 2019) [Accessibility in Ontario's Building Code](#). Updated July 21, 2021.

for cognitive, intellectual and psychiatric disabilities.⁴⁰ In what other context is it acceptable for someone to live in a place where every surface starts a foot above them, where they are not able to access what they need, including having access to storage or effectively using their kitchen, and living life meaningfully in their own home?

Until more accessible units are built, the current housing emergency means that for a disabled person on the rent-geared-to-income housing waitlist to be offered an accessible unit, another disabled resident has to die. If a disabled person waiting for a unit does not accept an “offer” of housing that is unlivable, inaccessible and unusable for them, they risk being kicked off this years-long waitlist. In some circumstances, people may not have access to information about their status on the centralized subsidized housing waitlist because it is not accessible; the main method of communication is by email, and information about access to TTY services (i.e. through accessing the [711 Relay Service](#)) are unclear and inconsistent. Disabled people are often isolated from their supports and denied access to the care and relationships they require to live their lives meaningfully. People are expected to relocate and, because of inaccessible processes, are unable to access the information they need to make informed decisions about their lives. We live in a city where disabled people have “chosen” Medical Assistance In Dying because no accessible affordable housing options exist.⁴¹

These are just a fraction of the ongoing dehumanizing encounters that disabled unhoused people face when navigating the abject failures and disregard from these systems, often intensified when people hold multiple marginalized identities. This dehumanization, entrenched into policy and practice, within a carceral and paternalistic system results in access being seen as a privilege that can be taken away as punishment. If the City truly believes in upholding the rights for all, including people with disabilities, they must invest in building programs, services and systems that do not shut people out or deny them their rights and their dignity. Meaningful inclusion, that goes beyond tokenistic engagement or anonymous surveys, requires structural change,⁴² accountability to feedback mechanisms, and intentional collaboration with disabled unhoused people most impacted by the inaccessibility of the shelter and housing systems.

Many guidelines, including the [City's Shelter Design and Technical Guidelines](#), would promote accessibility, if applied and adhered to within the shelter and subsidized or supportive housing systems. There are many institutions, including colleges and universities, that have comprehensive accessibility policies and procedures to ensure that people with disabilities are not left behind in emergency situations, which could be adapted to shelter and housing settings [see [Appendix B](#)]. While some of these may be longer-term solutions, there are many things that could be implemented more immediately that would significantly improve the conditions for physically disabled unhoused people interfacing with these systems. The City must be accountable to these guidelines and develop feedback mechanisms that are responsive to the concerns of disabled service users.

⁴⁰ Axel-Lute, M. (June 2023). [Disability Justice and Equity in Housing](#). *Shelterforce: Not just ramps--Disability and Housing Justice*. Retrieved 10-December-2024.

⁴¹ Avis Favaro. (April 30, 2022). [Woman with disabilities nears medically assisted death after futile bid for affordable housing](#). *CTV News*.

⁴² Alex Nelson (December 2020). [Nothing about us without us: Centering lived experience and revolutionary care in efforts to end and prevent homelessness in Canada](#). *Radical Housing Journal*, 2(2).

The City's own report on [Increasing the City's Supply of Accessible Affordable Housing](#)⁴³ indicates the need for integrating universal design principles from the outset is a benefit to all residents and would address the growing need for accessible units. Incorporating these principles into all units ensures that disabled people are not forced into positions of scarcity and impossible "choices." Having to constantly fight for accommodations for one's basic needs to be met while living under the constant fear of displacement is a traumatic, debilitating, dehumanizing and violent experience. We are living in a time of multiple mass disabling events, and statistics show that more people on ODSP continue to become unhoused across the province.⁴⁴ While specific accommodations will vary individually according to people's needs and still require work to integrate into existing buildings, there are baseline levels of accessibility and universal design principles that could ideally be built into new construction.⁴⁵ If all housing was designed with universal principles, this would improve living conditions for everyone. There must be shifts within the shelter and housing systems to ensure that disabled people have access to life-sustaining services that promote their survival with dignity, autonomy and consent.

The City of Toronto must take action to ensure that disabled unhoused people are centred and meaningfully consulted and included in decision-making in the context of the shelter and housing systems. There can be no housing justice without disability justice. There must be efforts undertaken by the City to ensure commitments to: centering disabled people in decision-making and program and service design; adhering to a definition of accessibility that supports disabled people to live their lives with dignity and self-determination; data collection; transparency, communication and accessibility of information; equipping staff with the training required to effectively support disabled service users; ensuring disabled people have access to and are not denied the care they require; and effectively including disabled people in emergency evacuation planning and procedures.

Ensure disabled unhoused people are effectively included in service design and decision-making

- 1) Ensure that disabled people can access all Toronto Shelter and Support Services programs, including shelters and respites as per the City of Toronto's [Accessibility Design Guidelines](#) and [Shelter Design & Technical Guidelines](#). Centre disabled people in decision making and program and service design. Create mechanisms for feedback that are responsive and accountable to the concerns of disabled service users. Collect this feedback in a centralized database to ensure system-wide accountability to create more accessible processes, programs and services.
- 2) Update the City of Toronto's definition to align with definitions of accessibility that support disabled people to live their lives with dignity and self-determination, and adheres to recommended guidelines and existing or expectant legislation including: [the United Nations Convention on the Rights for Persons with Disabilities](#); [Ontario Human Rights](#)

⁴³ City of Toronto. (Sept 12 2024). [Increasing the City's Supply of Accessible Affordable Housing](#)

⁴⁴ Pinkerton & Hauen (Sept 26 2024). [Number of homeless OW ODSP recipients has almost doubled in two years: government data](#). The Trillium.

⁴⁵ Axel-Lute, M. (June 2023). [Disability Justice and Equity in Housing](#). *Shelterforce: Not just ramps--Disability and Housing Justice*. Retrieved 10-December-2024.

[Code](#); [Toronto Accessibility Design Guidelines](#), [Shelter Design and Technical Guidelines](#); [Toronto Housing Charter](#); [Access Toronto policy](#); [Toronto Shelter Standards](#); [Toronto Community Housing Accessibility Policy](#); and [Accessibility for Ontarians with Disability Act Standards in Housing \(Appendix A\)](#). Ensure a baseline level of accessibility for all units in shelters, housing and respites that includes useability for wheelchair users. Build according to universal design with adaptability, especially in new buildings, for ease of future modifications. Ensure the City's Budget is reflective of these guidelines by allocating funds to build and modify units to be accessible according to these standards.

- 3) Ensure transparency, communication and accessibility of information: Conduct an accessibility audit of program sites and shelter and housing processes in collaboration with disabled service users, develop a global rating system, and make detailed information about accessibility available at Central Intake or on the City of Toronto website to support people to make informed decisions based on their specific access needs. Develop and implement plans for improving accessibility across the system, including allocation of funds in the City's Budget to operationalize these plans.
- 4) Collect meaningful data around (in)accessibility within the sector. Publicize the number of City-owned accessible units, and the number of people with disabilities accessing the shelter and subsidized or supportive housing systems. Include data on the number of people who are unable to access the shelter system due to inaccessible spaces.
- 5) Equip staff with tools, resources and training required to effectively support disabled service users, including training anti-oppression training with a focus on ableism and intersectionality, support to help disabled people with system navigation pieces (e.g. accessing assistive devices through the [assistive devices program](#), coordinating medical care); and emergency evacuation procedures. Advocate for additional funding and resources to ensure that shelters and subsidized or supportive housing programs do this effectively, in accordance with existing standards, legislation, and the strategies referenced in this document.
- 6) Ensure disabled people are not removed from their networks of care (i.e. medical care and other supports), which can be location-specific. Ensure disabled people have access to/are not denied care they require through lifting arbitrary restrictions around access to medical treatments, accommodations, meals, personal support workers, professionals, friends and community members who offer life-sustaining care provision. People have the right to their own medical care in shelters and supportive housing units and providers must not be allowed to deny people's access needs. Provide specific programming and supports for disabled service users within these systems. Ensure disabled people are not penalized for turning down housing options that are not accessible to them on the subsidized housing waitlist.
- 7) Meaningfully include and consult with disabled people in emergency evacuation planning and procedures. Create individualized fire safety and emergency evacuation procedures and plans for disabled people who may require assistance in an emergency as

mandated by the Ontario Fire Code ([Section 2.8.2](#)),⁴⁶ including methods of communication that are standardized into a consensual and comprehensive intake process. Draw from existing examples of effective emergency evacuation procedures for people requiring assistance [see [Appendix B](#)]. Ensure people with disabilities are not asked to or expected to engage in unsafe and inaccessible evacuation procedures.

- 8) Implement measures to ensure that staff are trained on safety and evacuation equipment and processes, and that there are supervisory staff available to oversee and implement emergency procedures, as per Ontario Fire Code ([Section 2.8.2](#))⁴⁷ and the City's own policies.⁴⁸ Prioritize the lowest floors within shelters, subsidized and supportive housing programs for people with disabilities and medical issues. In emergency situations, ensure disabled people who need support are not left behind until it is too late to evacuate safely. Develop inclement weather plans for ensuring timely snow removal processes to ensure accessibility in and out of buildings.

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⁴⁶ Ontario Fire Code: [O. Reg. 213/07: FIRE CODE](#)" Retrieved from: <https://www.ontario.ca/laws/regulation/070213>

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⁴⁸ City of Toronto. [Fire and Evacuation](#). *Approved Feb 2, 2009; re-endorsed December 8, 2022*.

Section 2: Expand capacity for safe indoor spaces

There is an ongoing and immediate need for the City to expand access to safe indoor spaces in the midst of this housing emergency. The number of people forced out of their housing and pushed into homelessness continues to increase dramatically in Toronto as a result of skyrocketing rental costs, demovictions and a shortage of tenant supports. The provincial tribunal which is tasked with adjudicating conflicts between landlords and tenants has been repeatedly critiqued for not upholding tenant rights and for its role in evicting a growing number of people into homelessness. The Landlord and Tenant Board adjudication process has been described as a parody of justice⁴⁹ where it takes just a few minutes for judges to unquestioningly endorse landlords' requests, and tenants are at such a disadvantage that most do not bother showing up to the hearings. People with disabilities are especially marginalized in these tribunal hearings. There are ample cases where landlords fail to reasonably accommodate people with disabilities, often resorting instead to eviction and prioritizing the rights of others.⁵⁰ In addition Advocacy Centre for Tenants Ontario (ACTO) has recently highlighted the issues of inaccessibility ingrained in the Landlord and Tenant Board adjudication process.⁵¹

People displaced from their housing deserve safe indoor spaces and a bed at night. Instead, violent legislation under the guise of "safety" from the provincial government through [Bill 223: Safer Streets, Stronger Communities Act](#) and [Bill 242: Safer Municipalities Act](#) threatens to shut down life-sustaining safe consumption and harm reduction services in the midst of a drug toxicity crisis, and continues to strip people living in survival shelters of their rights, while the premier of Ontario, Doug Ford, publicly dehumanizes unhoused people. These decisions amount to state-sanctioned violence which will disproportionately affect the health and survival of unhoused people, especially Indigenous community members.⁵² It is especially important in this increasingly hostile environment that the City government take greater measures to ensure everyone who needs it has access to a safe indoor space; these are matters of life and death.

Safe indoor spaces must encompass a range of options that offer predictability, autonomy, accessibility, and humane and livable conditions, including, non-congregate shelters, respite sites open year-round with surge capacity for extreme weather conditions, and harm reduction and overdose prevention services integrated within any of these facilities.

In the case where shelters might have spaces available, physically disabled unhoused people are often not considered or included in building and service design. For physically disabled shelter or respite service users, they often encounter the added dehumanization of getting to a centre and realizing it is closed or being unable to access the building because the access information was outdated, not published or unavailable via Central Intake. What is sometimes described as an "accessible" space might mean while someone can enter the space, people have to sleep in their wheelchairs or on the floor because it is not possible to navigate getting

⁴⁹ Gallié, M. 2022. [Eviction and International Obligations: Security of Tenure in Canada](#). The Office of the Federal Housing Advocate, Canadian Human Rights Commission. p12. Retrieved online.

⁵⁰ Ibid.

⁵¹ Ibid.

⁵² Olson Pitawanakwat & Balaban. (December 18, 2024). [Safety for Whom? Ontario's War on Safe Consumption Sites is no Act of Care](#). Yellowhead Institute.

into a cot for a non-ambulatory wheelchair user, or the distance between beds fails to provide adequate space to maneuver a mobility device or wheelchair safely. Often laundry machines and dryers are stacked which does not work for many disabled people. Equipment that increases access, like elevators, are often out of service or left unrepaired and sidewalks and ramps outside facilities are often not cleared to allow for safe operation of a wheelchair or other mobility aid. While often drop-in services and programs are designed for “everyone,” physically disabled community members are often forced to enter and exit through a small back door, through an alleyway, or only by a staff letting them in with a fob. The only references to supporting disabled unhoused people in the [Shelter Safety Action Plan](#)⁵³ involve exploring “disability supports” without clarity on what this involves. These processes and procedures further entrench the dehumanization, humiliation and disregard so often faced by unhoused and underhoused disabled people in this city.

Navigating poverty, homelessness and the emergency shelter system simultaneously excludes disabled people, exacerbates disabilities and also acts as a disabling process, often connected to the conditions within shelters and respites.

The risks of congregate shelter settings as 412 shelter-hotel spots slated to close

Non-congregate shelters, opened during the COVID-19 pandemic, provided improved living conditions including more privacy and reduced infectious disease risk. As a result, thousands of people experiencing homelessness accessing these spaces reported improved health and wellbeing outcomes. The City continues to close the remaining shelter-hotels, including the Delta shelter-hotel, where all “relocations” to housing or shelter for 412 spots are expected by October 2025.⁵⁴ It is already clear that there is nowhere for these residents to be “relocated” and no housing options exist. People are being discharged months ahead of the closure, and sometimes “choose” to live outside rather than have to deal with unsafe shelter conditions.⁵⁵ Within congregate settings the conditions often ensure the spread of contagious diseases and a lack of privacy, safety and rest.⁵⁶ 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.

An outbreak has recently been declared within the underhoused community by Toronto Public Health of *shigellosis*: a highly contagious and drug resistant infectious intestinal illness, where people in congregate settings in overcrowded conditions are at a heightened risk.⁵⁷ This is while healthcare providers prepare for the effects of H5N1 to reach this city, and we remain in a COVID-19 pandemic. People who are unhoused are more likely to experience chronic illnesses and poor health⁵⁸ and are therefore at risk of severe illness resulting from infectious disease outbreaks. There have been many COVID outbreaks within shelters, the largest of which had

⁵³ City of Toronto (2024). [Shelter Safety Action Plan](#).

⁵⁴ City of Toronto (2024). [2035 Kennedy Rd. – City of Toronto](#).

⁵⁵ Victoria Gibson (Jan 8, 2025). [“He was pushed out of a Scarborough Hotel Shelter Despite it Not Closing for a Year. He’s now sleeping in a nearby encampment.” Toronto Star](#). Retrieved online.

⁵⁶ Health Providers Against Poverty (2018). [An Evaluation of Toronto’s Warming Centres & Winter Response to Homelessness](#)

⁵⁷ Joanna Lavoie (December 11, 2024). [Outbreak of infectious intestinal illness declared among Toronto’s underhoused community. CP24](#). Retrieved online.

⁵⁸ City of Toronto. (2021) [“Street Needs Assessment: Results Report.”](#)

185 confirmed cases.⁵⁹ This illustrates how being unhoused can be a disabling process while also exacerbating people's existing disabilities and conditions.

There continues to be a dire need for enhanced infection control measures because of the ongoing COVID-19 pandemic, and heightened risk for the spread of contagious diseases within the shelter system, including measures around air quality, cleaning protocols, staffing, humane conditions, limiting overcrowding by having enough spaces to meet the need. A lack of these measures contributes to a lack of safety and disabling experiences within these systems.

Respite Sites

The City relies upon [winter respite sites](#) to provide space indoors when the general shelter system is full. Respite sites are typically far more crowded and often fail to meet [City's own shelter standards](#)⁶⁰ according to a Health Providers Against Poverty report from 2018.⁶¹ The report outlined the impact of poor conditions on the health and wellbeing of residents, and highlighted the need for non-congregate shelters.

Until adequate housing and shelter options exist, emergency respite sites must meet shelter standards, including accessibility standards, and offer hot meals and proper sleep surfaces like beds that are at least two meters apart. Sites must employ infection control measures including managing air quality, cleaning protocols, providing masks, and ensuring enough spaces are available to prevent overcrowding. For a full list of infection prevention measures see the extensive recommendations outlined in the previous SHJN Report from 2021: [Winter Plan and Plan for Moving Forward: Spring 2022 and Beyond](#).⁶²

Both shelter and respite sites are often full. In inclement weather, the City relies on limited "warming centres" to provide additional indoor space. In the City's 2024/2025 [Winter Services Plan for People Experiencing Homelessness](#), five sites are set to open at -5° C, and two additional centres are activated at -15° C. When it comes to accessibility of these spaces, winter makes this even more difficult for physically disabled unhoused people, where sometimes the limited number of accessible spaces are not reachable by transit or information about access within the building is not readily available. This information must be public and transparent.

While the City's plan this year has included 24-hour respite sites set to remain open for the duration of winter and additional warming centre spaces, the reality is that the need for decent and reliable shelter is ongoing and year-round. For the duration of the winter season the fluctuations in temperatures and weather conditions mean that people living outside are constantly cold, wet and at risk of severe injury, and arbitrary numbers should not be the determining factor of whether people have access to a safe indoor space. Often as soon as warming centres are opened, they are quickly at capacity and when they close, people are often discharged with no referral in place. Many unhoused people do not necessarily have access to checking the status of warming centres, or being notified of when these are set to open, making

⁵⁹ Toronto Public Health Statistics Compiled by Cathy Crowe

⁶⁰ City of Toronto (2022). [Toronto Shelter Standards](#)

⁶¹ Health Providers Against Poverty (2018). [An Evaluation of Toronto's Warming Centres & Winter Response to Homelessness](#)

⁶² Withers, Lacroix, Rehau, Danielson, Dodd, Whitman, Jewell, Crowe, Taylor, Hubert, Camargo, Cook. "Emergency Winter and Shelter Support and Infrastructure Plan." Shelter & Housing Justice Network. Toronto, 2021.

this an issue of information equity and access. Rather than “warming centres” or “cooling centres” that are connected to inclement weather amidst a climate catastrophe, the City must shift operations to year-round 24-hour respites that meet shelter standards and provide safe, dignified and humane conditions.

While the shelter system continues to operate beyond capacity, many people have stopped trying to find an indoor space, including people staying outside and people experiencing hidden homelessness (i.e. couch surfing, staying in violent/abusive relationships due to inaccessible housing options). It is clear that this winter will be deadly without immediate expansions to the City’s current plan that meaningfully address the housing and homelessness emergency. The City must operate enough shelters and respite sites year-round and ensure these sites have surge capacity to accommodate the increased need during inclement weather, and act immediately to expand the capacity for safe and truly accessible indoor spaces.

Expand capacity for access to safe indoor spaces

- 9) Until adequate shelter space is available, immediately shift operations of “warming centres” to act as low-barrier, year-round, 24-hour respites with surge capacity for extreme weather conditions. The need for adequate shelter and safe indoor spaces is year-round and ongoing during winter, not only when temperatures reach -5° C, -15° C or other arbitrary numbers. Ensure that an additional \$50 million from Toronto’s 2025/2026 budget is earmarked to make this happen.
- 10) Ensure City-run facilities meet [Toronto Shelter Standards](#)⁶³ and [Shelter Design and Technical Guidelines](#)⁶⁴ including: adherence to accessible design guidelines, infection-control measures and dignified conditions, enough accessible showers and bathrooms that are usable to wheelchair users, proper sleep surfaces, and access to appropriate food and meals. Ensure over two metres between beds to promote safer conditions, accessibility for people using mobility devices (e.g. wheelchairs, scooters), and to avoid the practice of “increasing” capacity by placing more beds into existing facilities. Ensure timely repairs, better beds, and addressing pest infestations.
- 11) As per the [City of Toronto Shelter Design and Technical Guidelines](#),⁶⁵ immediately ensure at least 20% of spaces in the emergency shelter system are accessible to and usable for disabled unhoused people, including wheelchair users. Develop a plan to increase this to at least 40% over the next five years, to affirm the City’s commitment to accessibility, referenced in the [Multi-Year Accessibility Plan](#),⁶⁶ including allocating funds in the City’s Budget to operationalize this goal.
- 12) Ensure safe and accessible spaces are available for marginalized people with unique needs, including physically disabled people whose needs are not currently being met within the shelter and subsidized and supportive housing systems. Improve people’s

⁶³ City of Toronto (2022). [Toronto Shelter Standards](#)

⁶⁴ Hilditch Architect Inc (2020). [City of Toronto Shelter Design and Technical Guidelines](#)

⁶⁵ Ibid.

⁶⁶ City of Toronto. [Multi-Year Accessibility Plan 2020-2024](#). Approved by City Council December 2019.

ability to safely reach accessible respite sites in winter by ensuring they are closer to accessible public transit. Increase the number of accessible respites and spaces in the winter to ensure that people are not forced to travel around an inaccessible city only to realize they are not able to get through the doors. Maintain accessible pathways, entrances, signage, and other features to ensure unhoused individuals with disabilities can move freely and access services without additional barriers.

- 13) Immediately stop the closure of shelter-hotels and implement a moratorium on evictions.
- 14) Advocate for the provincial and federal governments to each fund at least 4500 rent supplements to address the number of people experiencing homelessness.

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Section 3: Ensure dignified, humane, and responsive conditions in City services

Unhoused people, frontline workers, advocates, and people most impacted by callous, inhumane and violent policy decisions have been sounding the alarm on the state of the homelessness and housing emergency for decades within the City of Toronto⁶⁷ and across so-called Canada. This is a system predicated on paternalistic and harmful ideas of unhoused people rooted in frameworks of charity, capitalism, and dehumanization.

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 the provincial government intensifies their attacks on unhoused people and people who use drugs, the City must work even harder to ensure that people have access to the means for survival in life-affirming and life-sustaining conditions. Shelter and housing systems must move away from carcerality and disposability through the enforcement of arbitrary and rigid rules, punishment, control, displacement, and dehumanizing conditions, and 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.

Disabled unhoused people face increased levels of dehumanization, because of ableist policies and practices upheld within emergency shelter and housing services. Disabled residents are often denied the same rights and access as able-bodied residents, through policies, such as packages not being able to be delivered to your door, if you are unable to physically receive them in the lobby. People with disabilities who require assistance in emergency evacuation procedures are repeatedly left behind, not consulted with, or asked to engage in unsafe or inaccessible practices; they are disregarded and treated as disposable, rooted in logics of ableism, capitalism and eugenics, and assumptions that emergencies, such as fires, require us to prioritize the needs of some over others.⁶⁸ Some City-run buildings have buzzers locked between the outer doors and entrance to the building, meaning people visiting cannot contact their friends inside, which particularly impacts people who rely on supports. When people attempt to provide feedback or submit complaints, the mistreatment intensifies. Residents have reported being punished or reprimanded for attempting to improve the system.

For many disabled unhoused and underhoused people trying to access services, they are physically shut out of systems and programs. If they are able to enter a building, they might be unable to navigate the space with dignity and autonomy. Accessible pathways, entrances, signage, and other features must be provided to ensure unhoused individuals with disabilities, both visible and invisible, can move freely and access services without additional barriers. There must be meaningful and accountable consultation practices with unhoused people with lived

⁶⁷ Greene, J. (May 22, 2015). [Urban Restructuring, Homelessness, and Collective Action in Toronto, 1980–2003](#). *Urban History Review*, 43(1), Fall 2014: 5-49.

⁶⁸ Weibgen, Adrien (May 2015). The Right to be Rescued: Disability Justice in an Age of Disaster (May 2015). *Yale Law Journal*, Vol. 124(7), Available at SSRN: <https://ssrn.com/abstract=2529493>

experience, including people with disabilities, to ensure that unjust, unsafe, and exclusionary policies are not upheld within these settings.

Between 2023-2024, more than [1,200 refugees](#)⁶⁹ were abandoned by all levels of government due to discriminatory policies restricting refugee claimants from accessing beds within City shelter services, a subject of a recent report from the office of the Ombudsman Toronto.⁷⁰ The City Manager initially rejected this report, followed by City Council receiving the document at a the December City Council meeting for informational purposes only and without debate or discussion.⁷¹ The violence of this policy rooted in xenophobia, racism and anti-Blackness reflects the ways that colonialism, imperialism, ableism, and capitalism intertwine to first displace people from their own lands and then treat them as disposable an undeserving of survival,⁷² or of the systems of “care” reserved for “residents” of Toronto, while this all occurs on stolen land. It is essential that the City takes accountability by adopting the [recommendations highlighted in the Ombudsman’s report](#)^{73,74} and making commitments in the areas identified to: improve and clarify processes, train staff on anti-Black racism, meaningfully consult with impacted communities and experts, and strengthen accountability. The City must take steps to ensure that access to safe emergency shelter is never restricted based on immigration status or other facets of identity and that no marginalized group, including refugees, are scapegoated for a housing emergency.

The carcerality, control and punishment, dehumanization and disposability, power imbalances, and restrictions on freedom of movement, agency, and self-determination of residents, highlight how shelter and housing systems reflect mechanisms of the prison industrial complex. Until the shelter and supportive housing industrial complex can be abolished, and investments in housing and community-led supports established in its place, the amount of violence and harm that people are experiencing must be reduced. This violence is particularly felt for multiply marginalized individuals including disabled people, Black, Indigenous, and racialized folks, refugees, two-spirit, trans and gender-non-conforming people, youth, women, people who use drugs, and people existing at many of these intersections. Individuals in these groups are often disproportionately unhoused,⁷⁵ and 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. Implementing accessible facilities tailored to the diverse needs of these groups must be a priority to create real safety.

⁶⁹ City of Toronto (2023). [Report for Action: Immediate Federal Government Support Required for Refugee Claimants in Toronto](#)

⁷⁰ Addo, Kwame. (December 10, 2024). [An Investigation into the City’s Decision to Stop Allowing Refugee Claimants into Base Shelter System Beds](#). Office of the Ombudsman Toronto.

⁷¹ City of Toronto (2024). [December City Council meeting. Agenda Item History - 2024.CC24.1](#)

⁷² Chin, Natalie M., Centering Disability Justice (November 9, 2021). 71 *Syracuse Law Review* 683 (2021), Available at SSRN: <https://ssrn.com/abstract=3959992>

⁷³ Addo, Kwame. (December 10, 2024). [An Investigation into the City’s Decision to Stop Allowing Refugee Claimants into Base Shelter System Beds](#). Office of the Ombudsman Toronto.

⁷⁴ Kazemi, S (2017). A Step toward a Conceptualization of Transnational Disability: Engaging the Dialectics of Geopolitics, “Third World” and Imperialism. *Critical Disability Discourses*, 8. Retrieved from <https://cdd.journals.yorku.ca/index.php/cdd/article/view/39729>

⁷⁵ City of Toronto. (2021) [Street Needs Assessment Results Report](#)

The Urgency to Protect Harm Reduction Services Within Shelters

The impacts of stigma, discrimination and criminalization contribute to debilitating incidents, health inequities, increased overdose risk, and barriers to shelter and housing access for people who use drugs. Rates of overdoses within the shelter system peaked in [2021 at 125 non-fatal and seven fatal overdoses each month](#).⁷⁶ Since then, the number of overdose deaths in the shelter system has decreased. This is likely in part due tireless advocacy that led to the City increasing harm reduction services in the shelter system, including safe consumption sites and safe supply programs. The threats of these sites closing will disproportionately impact Indigenous community members, making this violent legislation an extension of ongoing colonial harm.⁷⁷ The City must collaborate with people who use drugs to develop and implement the measures needed to ensure these programs continue to operate in light of the provincial Conservatives' attacks on life-saving supports through [Bill 223: Safer Streets, Stronger Communities Act](#). It is imperative that the City fight for the dignity and survival of its residents.

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 navigate 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. 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, including specific training on anti-Black racism, ableism and effectively supporting disabled residents, including in emergency evacuation planning and processes. There must be opportunities to take direction from people accessing services and for their autonomy and consent to be foundational to services provided.

In order to effectively and safely support residents, individuals accessing shelter services must have access to robust supports that are anti-oppressive, inclusive, trauma-informed and culturally responsive. Inadequate training for staff has tangible consequences and heightens the risk of people being re-traumatized, experiencing violence, harm or death. Shelters, respites and all services must provide, maintain and uphold liveable conditions, as per [Toronto Shelter Standards](#),⁷⁸ and ensure access to harm reduction services, staff trained in overdose prevention, and the means to address food insecurity, disability supports including facilitating access to assistive devices and medical care, healthcare needs, and immigration and settlement services in appropriate languages with access to translation and interpretation.

For decades, the demand from unhoused people and advocates has always been for housing.⁷⁹ 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

⁷⁶ City of Toronto (2023). [Overdoses in Homeless Service Settings](#)

⁷⁷ Olson Pitawanakwat & Balaban. (December 18, 2024). [Safety for Whom? Ontario's War on Safe Consumption Sites is no Act of Care](#). Yellowhead Institute.

⁷⁸ City of Toronto. 2022. [Toronto Shelter Standards](#)

⁷⁹ Greene, J. (May 22, 2015). Urban Restructuring, Homelessness, and Collective Action in Toronto, 1980–2003. *Urban History Review*, 43(1), Fall 2014: 5-49.

prolonged periods in such poor conditions. People within these systems experience violent and traumatic situations while the conditions for housing “affordability” keeps getting worse.

Within the system, notions of safety that prioritize the comfort of some people over that of marginalized and poor communities must be challenged. These dangerous ideas 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.⁸⁰ 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.

Many of the recommendations outlined in the [Shelter Safety Action Plan](#)⁸¹ 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.

Mayor Chow and City Council have the opportunity and responsibility to be accountable to the unhoused residents of Toronto, and implement measures that cultivate real safety in City services, through implementation of the demands outlined here.

Ensure dignified, humane, and responsive conditions in City services

- 15) Convene an emergency task force including federal and provincial governments, frontline workers and people with lived experience of being unhoused, such as the [Toronto Underhoused & Homeless Union](#), including people with disabilities, to coordinate a response to the ongoing shelter and housing crisis in Toronto. Ensure meaningful engagement and accountability to the recommendations provided. Ensure groups consulting on the housing emergency situation with the City of Toronto are not benefiting from financialization and gentrification.
- 16) Collaborate with shelter and housing workers, advocates and people with lived experience (such as the [Toronto Underhoused & Homeless Union](#)), to ensure staff have the resources to perform their work and build relationships effectively, including fair wages and benefits, supportive conditions, and appropriate training, including de-escalation training from an anti-oppressive, trauma-informed framework to create safer conditions for residents and staff.

⁸⁰ 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>.

⁸¹ City of Toronto (2024). [Shelter Safety Action Plan](#).

- 17) Ensure full staffing of any City-run shelter and respite services with appropriately trained staff and relevant resources, including but not limited to: harm reduction services and supplies, mental health supports, grief supports, immigration and settlement services, access to interpretation and translation services as needed, effective supports for residents with disabilities, hot meal services, housing workers skilled in advocacy around accommodations and unique needs, and wi-fi.
- 18) Publicly fight against provincial legislation including [Bill 223: Safer Streets, Stronger Communities Act](#) and work to protect the continued operations of all safe supply, overdose prevention and harm reduction services within shelters. Expand overdose prevention, education, training and response, and ensure continued implementation and accountability to the recommendations of the [Toronto Shelter-Hotel Overdose Preparedness Assessment Project](#).⁸²
- 19) Adopt the recommendations from the [Office of the Ombudsman report: An Investigation into the City's Decision to Stop Allowing Refugee Claimants into Base Shelter System Beds](#). Ensure that access to safe emergency shelter is never restricted based on immigration status or other facets of identity, through discriminatory and dehumanizing policy decisions in accordance with existing City policies, including the [Toronto Housing Charter](#), [Access Toronto policy](#) and [Toronto Shelter Standards](#). Make commitments to improve and clarify processes, train staff on anti-Black racism, meaningfully consult with impacted communities and experts, and strengthen accountability through implementation of the 14 recommendations identified.
- 20) Implement a moratorium on shelter bans. During cold weather alerts, suspend any sanctions on clients who have been barred or suspended from services. In inclement weather, this is a matter of life and death.

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⁸² Toronto Shelter-Hotel Overdose Action Task Force. "[Toronto Shelter-Hotel Overdose Preparedness Assessment Project Final Report and Recommendations](#)." Toronto, 2021.

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Section 4: Promote survival for people sheltering outside

There are currently hundreds of people living outside in Toronto. Each month, more people are forced to sleep out in the open, in buses, subways or in transit stations, and on city sidewalks. Rent is much too expensive and the shelters are full. In this context, hundreds of people are forced to make do in an economy that fails to ensure housing for everyone. For many people, making a structure or setting up a tent is the best option available. These structures provide some relief from cold and precipitation. For many, they also provide a sense of home and stability. While survival structures are referred to as “encampments” by the City government, some organizers have highlighted the military roots of this term and how this can be a way of dehumanizing neighbourhoods and communities of unhoused people in order to legitimize and normalize state violence.⁸³ In this document, we strive to offer alternatives including “survival shelter” as an invitation to critical engagement with the language we use and its context.

While the [City's Interdivisional Protocol to Encampments](#)⁸⁴ cites a number of guiding principles including a human rights-based, trauma-informed approach that centres meaningful engagement, involves people in decision-making, is trauma informed, treats people living in encampments with dignity and compassion, and is grounded in a Housing First approach, that respects Indigenous knowledges and highlights collaboration and transparency,⁸⁵ we know this is not the reality of people living outside in survival shelters who are constantly displaced, harassed, and criminalized by City workers, private security and police, while their belongings, including survival equipment, mobility aids and medications, are seized and destroyed.^{86,87}

The City government, having failed to ensure conditions where everyone has access to housing, repeatedly destroys and “clears” survival structures. The City, along with the other levels of government, have a responsibility to ensure each person sheltering outside has housing they can afford that is accessible and dignified. Until this responsibility is met, people in survival shelters must be treated with respect and humanity. The government must ensure people sheltering outside have access to survival supplies like tents and sleeping bags as well as access to necessities like food, water, toilets and showers that are usable for wheelchair users.

People sheltering outside travel great distances at times, across the city to find a safe indoor space, at the risk of losing their survival supplies and their belongings being confiscated and expending high levels of energy, only to find out a warming centres is closed or is physically inaccessible, and this information was not available or up to date. Physically disabled people living outside have had to choose between freezing to death and not being able to use a bathroom in a shelter or respite, or have not been able to access a meal program or laundry because they are unable to enter a building. Disabled people are constantly having to choose between not having any dignity or control over any aspect of their lives or living outside, or living in housing where they cannot access what they need. Often when people living in survival

⁸³ Lee A. *Defying Displacement: Urban Recomposition and Social War*. Institute for Anarchist Studies; 2024.

⁸⁴ City of Toronto (May 2024). [City of Toronto Interdivisional Protocol for Encampments in Toronto](#)

⁸⁵ City of Toronto (May 2024). [City of Toronto Interdivisional Protocol for Encampments in Toronto](#)

⁸⁶ City of Toronto (June 2021). Trinity Bellwoods Operational Plan. page 36. Retrieved from:

<https://factchecktoronto.files.wordpress.com/2022/04/trinity-operational-plan-v-9-for-publication-1.pdf>

⁸⁷ CBC News. (May 2024). [Report signals shift in Toronto's approach to homeless encampments](#). CBC News.

shelters are forcibly displaced and violently cleared from a space, people's mobility aids and wheelchairs are confiscated, damaged or thrown away. People lose access to their life-sustaining medications and supplies, including harm reduction equipment. When people attempt to access the provincial [assistive devices program](#), they are told that they are not eligible because these devices are not meant for outdoor use, which disproportionately impacts physically disabled unhoused community members sheltering outside and often exacerbates people's disabilities.

Survival Shelters Aren't New

Communities of survival shelters, including tents, have been present in Toronto for a long time. City data presents a picture where the City of Toronto dismantles all encampments either with or without the consent of its residents. Over the last several years, the number of encampment clearings has increased exponentially with about 319 encampments leveled in 2017 – up to 725 in 2019.⁸⁸ In the summer of 2021, the City of Toronto spent nearly \$2 million clearing encampments in just three city parks.⁸⁹ With the cost of rent skyrocketing, the number of people forced to find shelter outside continues to increase at an alarming rate.

Conditions of Survival Shelters

As a result of inadequate resources and City by-laws, people sheltering outside are rarely able to garner substantial relief from the cold, heat and precipitation. There is ongoing exposure to frostbite, hypothermia and heat stroke. In addition, the lack of basic necessities like toilets, showers, running water and kitchens in encampments, as well as regular garbage collection, make it especially difficult for people to do things many people take for granted, like cook food or shower. This is particularly challenging for physically disabled residents sheltering outside, where there are even more limitations on finding facilities (e.g. washrooms, showers) that are truly accessible to wheelchair users or people using mobility aids, including scooters.

In addition to contending with the deprivation of basic necessities, people living outside in survival shelters report the constant stress of having their possessions taken, being pressured to move to shelters or having their structures cleared by City workers.⁹⁰ Because of the arbitrary measures that dictate when warming centres will be open, rather than operating 24/7 at least during the winter, people who manage to access an indoor space risk their essential survival supplies and necessary equipment they have acquired being cleared and damaged and having to rebuild when discharged back outside when centres inevitably close.

These horrendous conditions alongside an epidemic of toxic drug deaths has meant an increase in the number of unhoused people who are dying each year. This has a significant impact on

⁸⁸ FactCheck Toronto (April 22, 2021). [Claim: Parks Ambassadors work to ensure the city's parks are accessible, equitable and safe places for all](#). (accessed October 26, 2023).

⁸⁹ Draaisma, Muriel. (Sept 18, 2021) [Nearly \\$2 million spent on clearing encampments should have gone to housing, advocates say](#). *CBC News*.

⁹⁰ Boucher, Dodd, Young, Shahid, Khoe, and Norris (co-lead authors), Brown, Warsame, Holness, Kendall, Mergarten, Pariseau, Firestone, Bayoumi. MARCO Evaluation of Encampment Outreach Supports during COVID-19 Final Report. Toronto, Ontario: MAP Centre for Urban Health Solutions, St. Michael's Hospital. October, 2022. Available from: https://maphealth.ca/wpcontent/uploads/Encampments_finalreport.pdf, p.5

people in encampments. The MARCO study on encampments states, "Encampment residents reported losing friends, family and partners as well as experiences of finding people dead..."⁹¹

This experience of ongoing deprivation, violence and trauma disproportionately impacts Indigenous communities. According to City statistics, Indigenous people are substantially over-represented in encampments. Indigenous people made up 23 percent of people living outside even though Indigenous people make up 2.5 percent of the Toronto population.⁹² This overrepresentation is directly connected to historic and ongoing colonization that is carried out by the State. Racist systems like residential schools, the current child welfare system, land theft, broken treaties and the intentional erasure of language and culture have contributed to many Indigenous people being disconnected from their families, culture, livelihood spiritual practices, and basic necessities.⁹³ City statistics also indicate that Black, non-binary, transgender and Two-Spirit people are also overrepresented more broadly in the unhoused community.⁹⁴

In the midst of these conditions that are precipitated by state abandonment, people report being able to build community and collaborate in order to care for each other. The MARCO Evaluation of Encampment Outreach Supports cites one encampment resident as saying: "You're not by yourself in the encampment. In the shelter, on the street, you are by yourself. But in the encampment everyone has to look out for each other to make sure you're good. Right, that's how you keep a nice home. Everyone plays a part."⁹⁵ Communities of survival shelters offer space for autonomy and the opportunity to care for each other in a way that the institutional infrastructure and regulations of shelters do not allow.

This statement from the Canadian Housing Advocate's Review of Homeless Encampments executive summary is worth echoing: "All governments must act to stop forced evictions of encampment residents, to stop the criminalization of people who are unhoused, to combat discrimination, stigma, and negative stereotyping of people who are unhoused, and to ensure access to legal remedies for rights violations related to housing."⁹⁶ Doug Ford's Progressive Conservative government has instead disregarded this statement by the Canadian Housing Advocate and have tabled [Bill 242: Safer Municipalities Act](#) which makes it easier for unhoused people to be arrested, fined and imprisoned. Mayor Chow and Toronto City Council must speak out publicly against this harmful and oppressive bill. In addition, it is essential that people sheltering outside receive supports like trauma-informed mental health supports that include care for grief and loss, that City-funded outreach agencies and City workers stop using hierarchical approaches and instead make sure to center the voices and decisions of residents.⁹⁷ People also must be provided with basic necessities like sleeping bags, food, and toilets and showers that are usable for wheelchair users. The self-determination of Indigenous people in encampments must be respected, and they should be provided access to culturally appropriate supports and services. That said, it is imperative that decision-makers do not lose

⁹¹ Boucher, Dodd, Young, Shahid, Khoe, Norris et al. MARCO Evaluation of Encampment Outreach Supports. p. 6

⁹² City of Toronto. (2021). "[Street Needs Assessment: Results Report](#)." p. 6

⁹³ Schwan, Lutoto, Freeman, van Wagner, Flynn, McCartan, Graham. (2022). Case study: Toronto—A human rights analysis of encampments in Canada. The Office of the Federal Housing Advocate. p. 13

⁹⁴ City of Toronto. (2021). "[Street Needs Assessment: Results Report](#)." p. 6

⁹⁵ Boucher, Dodd, Young, Shahid, Khoe, Norris et al. MARCO Evaluation of Encampment Outreach Supports. p. 20

⁹⁶ Office of the Federal Housing Advocate (2023). [Upholding dignity and human rights: the Federal Housing Advocate's review of homeless encampments – Executive Summary](#). Office of the Federal Housing Advocate, Canadian Human Rights Commission.

⁹⁷ Boucher, Dodd, Young, Shahid, Khoe, Norris et al. MARCO Evaluation of Encampment Outreach Supports. p. 9,10.