



Alejandra Bravo

CITY COUNCILLOR | CHAIR, ECONOMIC & COMMUNITY
WARD 9 • DAVENPORT | DEVELOPMENT COMMITTEE

Mayor Olivia Chow
City Hall, 2nd Floor
100 Queen St. W.
Toronto, ON M5H 2N2

March 18, 2025

Dear Mayor Chow,

Homelessness has grown exponentially across Canada. The Association of Municipalities of Ontario reports¹ Ontario's unhoused population currently numbers 80,000 and will double in a decade, reaching up to 300,000 in an economic downturn. The core causes of homelessness are a critical lack of affordable housing, insufficient income, and reduced social and health supports.

In December 2024, the Toronto Ombudsman released his report on an investigation of the City of Toronto's response to the refugee shelter crisis in 2022 and early 2023, which most visibly impacted East African asylum seekers. The Ombudsman's report raised several operational questions regarding the provision of shelter in our city.

The City of Toronto operates the largest shelter system in Canada, which has grown significantly in recent years. Given the ongoing high demand for emergency shelter, and the complexity of the challenges facing a diverse unhoused population with a range of needs, this is an opportune time to consider ways to clarify policies regarding access to shelter and shelter provision, including:

1. Protocol for shelter bed allocation

Greater clarity on access to emergency shelter beds in Toronto is necessary, such that the process for how open shelter beds are accessed is documented, publicly available, and understood by members of the public and users of the shelter system. A clear triage system that defines how access is determined in a system where not everyone is able to get a shelter bed is critical.

Currently, some shelter beds are held for Toronto Community Crisis Service or for the procedures set out by the Interdepartmental Protocol on Encampments. In addition, there are shelter beds that are aligned with specialized programs and supports designed for specific populations, such as youth, people fleeing domestic violence, and others, which may not be made available to all individuals. However, this and other dimensions of shelter allocation are not clearly outlined, understood, or accessible in a transparent manner.

¹ <https://www.amo.on.ca/policy/health-emergency-and-social-services/reports-ontarios-homelessness-crisis-water-and>

The operation of the emergency shelter system would be aided by the development of a protocol that sets out what guides decisions and processes on access to shelter beds in Toronto.

2. Jurisdictional responsibilities and funding agreements with other governments

There are important issues with respect to the provision of shelter to groups without Canadian citizenship or permanent residency that would be aided by greater documentation and clarity on the policies and practices guiding shelter operations.

AccessTO is a policy for open access to City services including shelter, which was created to meet the needs of undocumented workers and states that users of a service should not be asked for their status. However, there is an exemption where services are funded by another order of government that has set out operating guidelines. This is the case with the federal Interim Housing Assistance Program (IHAP) for refugees, which includes instruction to municipalities to document shelter users' immigration status in order for the City to qualify for federal reimbursement.

Further, Canada is a signatory to international agreements including the 1951 Refugee Convention and the International Covenant on Economic, Social and Cultural Rights. A rights-based approach entails understanding the structural causes of the non-realization of rights and analyzing who bears the obligation to uphold them. More clarity on any obligations accruing to municipalities, and the corresponding tests for their fulfillment, would help in the provision of City services, including shelters.

3. Federal government changes to funding of shelter for refugees

Starting in January 2025, the federal government has made significant changes to IHAP which will result in reduced funding for shelter beds immediately and incrementally. The implications of the policy and funding change, as the City builds out a refugee-specific shelter approach as directed by City Council, should be urgently considered.

I look forward to working with you and all Members of Council to continue addressing this urgent need in our city.

Sincerely,



Councillor Alejandra Bravo
Ward 9, Davenport
Chair, Economic & Community Development Committee