

## Summary of Toronto Shelter and Support Services Work in Response to Ombudsman's Report: An Investigation into the City's Decision to Stop Allowing Refugee Claimants into Base Shelter System Beds

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On December 17 and 18, 2024, City Council received [CC24.1](#) for information. Toronto Shelter and Support Services (TSSS) is providing the following information as a summary of the work undertaken that addresses the recommendations in the Ombudsman's report on the refugee response:

**Recommendation 1:** That the City follow the Toronto Shelter Standards' interim amendment process by using a Directive when making such amendments.

### ACTIONS:

- Toronto Shelter Standards provide City of Toronto-funded shelter providers and clients with a clear set of expectations, guidelines and minimum requirements for the delivery of shelter services in Toronto.
- In order to maintain the relevance of the Toronto Shelter Standards to the evolving realities of shelter service delivery, the Toronto Shelter Standards are subject to amendment. TSSS reserves the right to introduce interim amendments to the Toronto Shelter Standards outside of the regularly scheduled amendment process via TSSS Directives.
- Directives are a communication bulletin notifying shelter providers of new service requirements or prescribed action(s) required under the authority of the Operating Agreement, Toronto Shelter Standards, City Council resolution or other legislation. Directives may also be used to clarify an existing shelter standard or to issue interim service requirements or standard(s).
- Directives will be issued and communicated to all shelter providers, and can be found on the TSSS [public facing website](#). Providers are expected to implement Directives as with all other standards and current guidance.
- In 2022, TSSS consulted with clients and staff to understand what changes needed to be made to the [Toronto Shelter Standards](#) to better serve Black clients. This work was

done to advance Action 10.2 of the City's [Toronto Action Plan to Confront Anti-Black Racism](#), which required TSSS to apply an Anti-Black Racism analysis to shelter standards and procedures. It also aligns with Implementation Priority #2 in TSSS' [Homelessness Solutions Service Plan](#), which focuses on equity.

- The Confronting Anti-Black Racism (CABR) standards were created in consultation with 150 clients across 16 shelter sites; over half of participants in this consultation were refugee claimants who had been in Canada for less than a year. 98 staff at all levels were engaged at more than 20 virtual engagement sessions, including 11 dedicated Black staff engagement sessions.
- The CABR standards cover the areas of: capacity building; policy development; complaints process; admissions and discharges; client engagement to support ABR; collaboration with community partners; client-focused ABR resources and supports; providing culturally relevant food; and updating the [Training Topics and Professional Competencies Matrix](#) requiring mandatory training on Confronting Anti-Black Racism for all shelter staff, in addition to the already required Anti-Racism Anti-Oppression training.
- The standards are captured in [Directive 2023-03](#) released on December 18, 2023. Support provided to the shelter system by TSSS to facilitate implementation includes:
  - [Questions and Answers: Confronting Anti-Black Racism Standards](#)
  - [Poster: Stop Anti-Black Racism](#)
  - Information sessions for supervisory staff on changes to the Toronto Shelter Standards (5 sessions offered; over 150 attendees).
  - 2024 Service Standards assessment of 99 shelter and respite sites reviewed compliance with CABR standards for benchmarking and identification of opportunities for support and improvement with implementation.

**Recommendation 2:** That the City ensure all future changes to refugee claimant shelter eligibility adhere to the Ontario Human Rights Code, the City's Human Rights and Anti-Harassment/Discrimination Policy, Access T.O., and the Toronto Shelter Standards by having these proposed changes reviewed by the City's Human Rights Office, the Confronting Anti-Black Racism Unit, the Toronto Newcomer Office, and other relevant internal experts before implementing them.

#### ACTIONS:

- In 2025, TSSS has been expediting the establishment of a dedicated refugee shelter system. Staff are working on a report that will go to Council in 2025. This work will ensure that relevant internal and external experts are engaged on potential changes, and that recommendations are brought forward to Council for consideration and direction.
- TSSS regularly attends the Newcomer Leadership Table (quarterly meetings) as well as the S DFA Cluster Tables upon request when related to refugees and refugee services.
- An advisory table will be established with leaders from this sector playing an advisory role.

**Recommendation 3:** That compliance with these policies be documented through a formal procedure with sign off by the General Manager of TSSS.

**ACTIONS:**

- See above for update on the establishment of dedicated refugee shelter system and report that will be going to Council in 2025.

**Recommendation 4:** That the formal procedure above be shared with the Ombudsman by March 31, 2025, prior to implementation.

**ACTIONS:**

- See above for update on the establishment of dedicated refugee shelter system and report that will be going to Council in 2025.

**Recommendation 5:** That all TSSS staff involved in shelter policy development as well as senior TSSS leadership (the General Manager and directors) be trained in the Anti-Black Racism Analysis Tool by June 1, 2025, and that all new shelter policy staff, as part of their onboarding, be trained in this tool.

**ACTIONS:**

- TSSS has engaged Social Development Finance and Administration division's (SDF) Confronting Anti-Black Racism (CABR) unit to request Anti-Black Racism Analysis Tool training.
- TSSS continues to prioritize completion of mandatory equity and Anti-Black Racism training:
  - 88% of TSSS staff have completed CABR training and a completion plan is in place to support the remaining 12% and newly onboarded staff.
  - 62% of TSSS staff have completed the Toronto for All training which is mandatory for all staff. This training includes "Let's Explore Anti-Black Racism" training, "Let's Talk About Bias", "Let's Talk About Allyship", "Let's Talk About Systemic Injustice" and other Equity and Inclusion related training.
- In 2020 TSSS established a CABR team positioned in the General Manager's Office. The team has grown to include four permanent positions including Policy Development Officer, Coordinator, Programs, Management Consultant and Business Support and Workforce Planning Specialist. The team supports systemic and organisational initiatives for City operated and community operated shelter and homelessness service providers.
- Between 2021 and 2023 the majority of Supervisors, Managers and Senior Management including the General Manager participated in a four day Anti-Oppression Psychotherapy training. In total 173 staff completed the training.
- TSSS engaged a third-party consultant to facilitate a day-long planning session with the division's Senior Management Team (SMT) on February 28, 2025. The planning day:

- Provided SMT with an overview of equity in leadership and how to embed equity in our roles
- Supported “safe” conversations about the division and SMT’s commitment to advance equity initiatives while unpacking past experiences with divisional impact
- Focused on relationship building in non-colonial structures and collective courage- putting lessons in practice
- Encouraged accountability and responsibility to be proactive in fostering an equitable workplace through policy, plans and practice including review of the Anti-Black Racism Analysis tool.
- In partnership with Toronto Hostels Training Centre, TSSS has developed a customized Anti-Black Racism training to be released to Purchase of Service (community operated) shelter workers
- Developed a Confronting Anti-Black Racism (CABR) Considerations for Shelter Providers to guide policy and program development from an Anti-Black Racism analysis lens. The Anti-Black Racism Analysis Tool is incorporated into this document.
- In the development of the CABR Considerations for Shelter Providers document, consultation sessions were held with the Knowledge Exchange Table, which includes management staff in the homelessness services sector from Directly Operated Shelters (DOS) and Purchase of Service (POS) shelters. TSSS has also presented the CABR Considerations document to the Knowledge Exchange Table and Toronto Alliance to End Homelessness with wide release of the documents scheduled in the spring of 2025.

**Recommendation 6:** That the City develop a framework to analyze any new shelter eligibility changes for alignment with the Toronto Housing Charter before these new changes are implemented.

**ACTIONS:**

- In 2025, TSSS has been expediting the establishment of a dedicated refugee shelter system. Staff are working on a report that will go to Council in 2025. Through this work, consideration will be given to specific eligibility criteria (i.e. refugee claimant status) that will be incorporated into a framework for access to the emergency shelter system. Relevant internal and external experts will be engaged on potential changes, and the recommendations will be brought forward to Council for consideration and direction.

**Recommendation 7:** That this framework be finalized by March 31, 2025, and shared with the Ombudsman prior to implementation.

**ACTIONS:**

- Staff are working on a report that will go to Council in 2025.

**Recommendation 8:** That senior executives at the City, including the City Manager, Deputy City Manager (Community & Social Services), and the General Manager of Toronto Shelter & Support Services, invite the Chair of the Housing Rights Advisory Committee and the Executive Director of the Housing Secretariat to a meeting to discuss the City's obligations flowing from its commitment to progressively realize housing as a human right by March 31, 2025

**ACTIONS:**

- See update below under Recommendation 9.

**Recommendation 9:** That the City hold a dedicated training session for the directors of TSSS delivered by the Executive Director of the Housing Secretariat (or their designate) on the City's obligations flowing from its commitment to progressively realize housing as a human right by March 31, 2025. The Executive Director of the Housing Secretariat may wish to consider inviting the Chair of the Housing Rights Advisory Committee and others (as needed) to help facilitate this session.

**ACTIONS:**

- Pertaining to both Recommendations 8 and 9, City Council adopted in June 2024 [EC13.8](#) "The City's Encampment Approach and Strategy" which identified the City's commitment to applying a human-rights based approach to supporting people experiencing unsheltered homelessness and living in encampments. As part of this commitment, TSSS has engaged with the Chair of the Housing Rights Advisory Committee and Executive Director of the Maytree Foundation to design and develop a training curriculum to be delivered to front-line and senior staff including General Managers, Executive Directors and divisional Directors. The training will focus on strengthening our collective understanding of the application of the progressive realization of the right to housing as well as key considerations when applying a human-rights based approach to supporting people experiencing homelessness. While work is still underway to finalize the training modules, training sessions are expected to begin in spring 2025.

**Recommendation 10:** That senior executives at the City, including the City Manager, the Deputy City Manager, and the General Manager of Toronto Shelter & Support Services, offer to hold a round-table session with key refugee-claimant-serving organizations and housing rights advocates to learn from these organizations, with the goal of informing future City decisions related to emergency housing for refugee claimants. If accepted by these organizations, this session should be held by June 1, 2025.

**ACTIONS:**

Staff are regularly meeting with key refugee claimant serving organizations and housing rights advocates. The following are some regularly scheduled meetings:

- Quarterly meetings with refugee serving providers funded by TSSS and co-chaired by Refugee Response.

- Bi-weekly meetings, Asylum Claimants Health Touchbase, co-chaired by Refugees Response and Ontario Health.
- Monthly meetings with Refugee Sector Table, chaired by Toronto Shelter Network.
- Monthly meetings with Asylum Claimants Navigation Workgroup and the Asylum Claimant Health Network for Northwest Toronto, chaired by Ontario Health.
- Regular attendance at quarterly meetings of the Newcomer Leadership Table
- Regular attendance at SDFA Cluster Tables upon request when related to refugees and refugee services.
- Ongoing and regular meetings (weekly, bi-weekly or monthly) with Agency Review Officers (AROs) and City-funded refugee service providers to receive feedback and input.
- Working with SDFA's CABR unit on the renewed 10 Year Action Plan to Confront Anti-Black Racism, in tandem with the Housing Secretariat and SDFA CABR Unit, TSSS supported community consultations which also sought feedback from Black agencies including refugee claimants and organizations that support refugee claimants.

**Recommendation 11:** That the City develop a comprehensive strategy for meaningfully engaging with refugee claimants and refugee-claimant-serving organizations to help plan and deliver shelter services impacting refugee claimants. This strategy should include clear definitions of “meaningful engagement” and set out how the City will incorporate the feedback it receives.

**ACTIONS:**

- In 2025, TSSS is prioritizing the establishment of a dedicated refugee shelter system. To achieve this, the division is collaborating with refugee claimant serving organizations in the planning, development and implementation of the system, as well as the establishment of an advisory table with leaders in the sector. TSSS will bring a report forward on the dedicated refugee shelter system to Council in 2025.
- As part of the strategy for meaningful engagement and to achieve better client outcomes, TSSS undertook consultations with refugee houses in 2024 to introduce the refugee house model to the City shelter system, particularly to examine the model to resolve the applicability of the Multi-Tenant Housing Framework. By early 2025, more than 200 new refugee-spaces were added to the shelter system.
- TSSS staff attend meetings with Toronto Coalition of Refugee Houses chaired by the sector as well as the Ontario Coalition of Refugee Houses.
- TSSS is developing the first permanent, purpose built Black mandated shelter, as part of the Council-approved [Homelessness Services Capital Infrastructure Strategy \(HSCIS\)](#) and highlighted in that report in December 2023. Progress to date includes:
  - A general Expression of Interest (EOI) was launched in the Fall 2024 and closed on October 6, 2024 and will be launched on an approximately annual basis for non-profit organizations across the city to apply to operate a HSCIS shelter.
    - To support early discussions of the Black mandated EOI, TSSS formed an internal workgroup made up of majority Black staff from several units.
    - TS3 also held consultation meetings with the African Canadian Collective (ACC), Black Resilience Cluster (BRC) and service providers who indicated an interest in possibly submitting to the general EOI application,

these consultations provided key insights leading to draft recommendations to the process.

- In July 2024, TSSS, in collaboration with Social Development, Finance and Administration (SDFA) and Housing Secretariat (HS) held two engagement sessions to share information and solicit input on the City's first Black Mandated shelter, Black Housing Framework and the 10-year Confronting Anti-Black Racism Action Plan. Attendance included 30 Black service agencies and 60 Black residents, including those with lived experience of homelessness.
- As part of the EOI process, TSSS CABR team led three consultations over December 2024 and January 2025 with several Black serving and refugee claimant service providers after which key recommendations for consideration related to the Black Mandated EOI Application (including providing additional support throughout the process), Guidelines and Evaluation Criteria were developed as well as the opportunity to include consortium and trustee partnerships.
- As part of the HSCIS' Black mandated shelter TSSS will use the City's definition of B3 (Black-led, Black-focused, and Black-Serving) which speaks to the percentage of clients served who self-identify as Black. As part of this work, the Toronto Housing Charter will be reviewed as part of the EOI process.

**Recommendation 12:** That the City complete its engagement strategy and share it with the Ombudsman no later than June 1, 2025.

**ACTIONS:**

- TSSS will be expediting establishment of a dedicated refugee shelter system, built upon the engagement undertaken. Staff are working on a report that will go to Council in 2025.

**Recommendation 13:** That the City update Ombudsman Toronto on TSSS's approach to data collection, and explain how data will be used to track progress toward achieving the progressive realization of the right to adequate housing for all shelter users and those trying to access shelter, including refugee claimants. This may be done in consultation with the Data for Equity Unit (People & Equity) or any other related internal or external experts.

**ACTIONS:**

- TSSS has identified a 2025 divisional priority on Performance Outcomes, to define system performance measures to achieve client outcomes. This work will assess the equity impact, i.e. use identity marker data to interrogate our performance measures. This will help to inform how specific client groups experience access to shelter, quality of shelter programs, and housing supports and outcomes.
- We are undertaking work to explore updates to racial identity, gender identity and refugee status question at Central Intake and other access points. This would involve both policy and operational considerations, and may be done in consultation with the Data for Equity Unit (People & Equity) and other related internal or external experts.

- We are committed to following the City’s work to establish Black data governance models, which includes centring Black voices in decision-making on data, building trust with Black communities through engagement, and using data for the good of Black communities. We also acknowledge the important intersections of lived experience of homelessness with lived experience of anti-Black racism, and are committed to ensuring that the City’s approach to Black data governance of homelessness service data addresses these intersections.

**Recommendation 14:** That the City provide a status update on the implementation of all these recommendations by June 1, 2025, and quarterly thereafter.