Access to Shelter Framework
Toronto Shelter and Support Services

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1. Introduction and Purpose

The Toronto Shelter and Support Services (TSSS) Access to Shelter Framework (the Framework) guides decision-making around shelter eligibility changes. Access to emergency shelter is often the first step for individuals or families moving out of homelessness. The Framework aims to ensure decisions are:

- Rights-based, in line with the Toronto Housing Charter and National Housing Strategy Act.
- Transparent and accountable, demonstrating TSSS' adherence to human rights and equity, and commitments in the Reconciliation Action Plan and anti-racism.
- Operationally clear, outlining processes, roles, and responsibilities

Outcomes:

- Staff, clients, and partners understand how TSSS operationalizes its vision, mission, and strategic priorities;
- Eligibility decisions are compliant with the Ontario Human Rights Code, Toronto Shelter Standards, and City policies;
- Changes are documents and applied consistently to support continuous improvement.

Scope: This Framework does not determine priority groups for shelter access; it focuses on procedural and policy alignment.

2. Background and Context

TSSS manages and oversees emergency shelter and related supports for people experiencing homelessness in Toronto. The Division provides services both directly and through funded community agencies, including:

- emergency shelter, 24-hour respite and drop-in programs
- wrap-around support services
- street outreach

Demand for shelter consistently exceeds capacity across City-operated and community-delivered programs, and many individuals are unable to secure a bed on a given night. TSSS is committed to equitable access and connecting clients to supports that promote housing stability, guided by a human rights-based approach that emphasizes dignity, autonomy, and participation, with the aim of making homelessness rare, brief, and non-recurring.

Shelter access is coordinated through Central Intake using the Shelter Management Information System (SMIS), though the system also uses a "no wrong door" approach through additional pathways, including Streets to Homes outreach, shelter-to-shelter referrals, direct walk-ins, and partner referrals. Most programs operate on a first-come, first-served basis, with certain population-specific or transitional programs having additional eligibility requirements. Shelters are organized by population – adult men, adult women, mixed adults, youth, seniors, and families – with targeted supports for Indigenous people, Black populations, 2SLGBTQ+ individuals, refugees, people with disabilities, and French-speaking clients. Intake and eligibility assessments are guided by principles of equity, anti-discrimination, and transparency, and Central Intake is increasingly used to streamline referrals and ensure consistency.

System Challenges:

The shelter system faces persistent pressures that limit access. Demand exceeds available capacity, infrastructure is aging, and site availability for new shelters is limited. These constraints disproportionately impact equity-deserving groups, including Black residents, Indigenous people, newcomers, and others overrepresented among those experiencing homelessness. Limited system flow and insufficient affordable or supportive housing options compound these challenges. The Division continues to collaborate with partners across government and community sectors to address these constraints and progressively realize the right to adequate housing and equitable shelter access in Toronto.

3. Council Direction

On March 26-27, 2025, City Council adopted Agenda Item History - 2025.CC28.2, directing TSSS to develop an Access to Shelter Framework. Key directives include:

- Document all changes to shelter eligibility in a formal protocol for bed allocation, ensuring compliance with:
    - Ontario Human Rights Code
    - City's Human Rights and Anti-Harassment/Discrimination Policy
    - Access T.O.
    - Toronto Shelter Standards
- Develop changes in consultation with internal experts, including the Human Rights Office, The Confronting Anti-Black Racism Unit, and Toronto Newcomer Office.
- Ensure compliance is documented through formal procedures with sign-off by the General Manager.
- Review procedures for eligibility changes with City Council and share with the Ombudsman and relevant divisions before implementation.
- Develop a framework to analyze new eligibility changes for alignment with the Toronto Housing Charter; review by the Housing Rights Advisory Committee and The Confronting Anti-Black Racism Advisory Committee.
- Finalize and approve the framework in Q4 2025 and share with the Ombudsman and relevant divisions prior to implementation.

This establishes a transparent, accountable, and rights-based process for shelter eligibility decisions.

4. Objectives

The Framework guides decision-making on shelter eligibility and aligns with the Toronto Housing Charter, Ontario Human Rights Code, and City policies, such as the City's Human Rights and Anti-Harassment/Discrimination (HRAP) and AccessTO. It aims to:

1. **Clarify and communicate access:** Ensure that shelter eligibility criteria are clear, transparent, and understandable to clients, staff, and the public.
2. **Ensure compliance**: Align all access and eligibility decisions with relevant legislations and City policies.
3. **Enhance transparency and accountability:** Promote consistent, fair decision-making with clear governance, accountability, documentation, and oversight.

4. **Support strategic planning:** Reinforce TSSS priorities, resource management, risk management, and continuous improvement across programs and service delivery.

5. Authority, Legislation, and Policy Context

TSSS derives its authority to manage emergency shelters and related supports from both provincial legislation and City policies. This legal and policy framework ensure that the Division can plan, fund, and deliver shelter services while fulfilling human rights and equity obligations.

Key Legislation and Authority:

- Housing Services Act, 2011: establishes TSSS as a service manager for housing and homelessness programs.
- City of Toronto Act, 2006 (COTA): provides municipal authority and delegations of powers.
- Ontario Human Rights Code: Requires shelter access and eligibility decisions to be non-discriminatory and accommodate clients up to the point of undue hardship
  Toronto Housing Charter: guides decision-making towards progressively realizing the right to adequate housing.

City Policies and Standards:

- Human Rights and Anti-Harassment/Discrimination Policy (HRAP): Provides guidance for equitable and non-discriminatory service delivery.
- Access T.O.: The AccessTO policy outlines that all Torontonians, regardless of immigration status, have the right to access City services without fear.
- Toronto Shelter Standards: Establishes operational expectations for all City-funded and operated shelters, including mandatory equity focused standards:
  - Confronting Anti-Black Racism (2023)
- 2SLGBTQ+ focused service updates (nearing completion)

6. Roles and Responsibilities

Role	Responsibilities
City Council	- Represents the public, approves policies and budget, ensures accountability, and delegates powers as per COTA.
General Manager, TSSS	- Administers Division operations and ensures compliance with policies and human rights obligations. - Approves and signs off on shelter eligibility changes and emergency adjustments.
Directors & Program Staff	- Conduct analysis, provide recommendations, and apply equity and human rights assessments.
Internal Experts	- Consultees include Legal Services, Human Rights Office, The Confronting Anti-Black Racism Unit, Toronto Newcomer Office

7. Framework Review and Shelter Eligibility Changes

TSSS will periodically review the Framework to ensure alignment with legislation, strategic priorities, and emerging needs.

Eligibility changes may arise from:

- Council or Committee direction
- Staff, stakeholder, or sector-identified issues
- Legislative, policy, or funding requirements
- Risk mitigation, resource allocation, or operational improvement

Principles for Eligibility Changes:

1. Comply with legislation and City policies
2. Align with City and TSSS strategic priorities
3. Evidence-informed and risk-managed
4. Developed collaboratively, with internal and external consultation
5. Documented formally with General Manager sign-off

Mandated Changes:

- When required by other levels of government, the Framework may be used as an impact assessment tool to evaluate equity effects, mitigations strategies, and alignment with human rights obligations.

8. Access to Shelter Framework

Shelter eligibility refers to the **criteria** that determine whether an individual can access a specific shelter program.

The following table provides a structured approach to analyzing proposed shelter eligibility changes in keeping with Toronto's Housing Charter. The table is also meant to help staff understand and document the equity impacts of proposed changes ensuring that the decision will help advance the framework's intended outcomes which include advancing TSSS' vision, mission, and values, demonstrate transparency and accountability in policy development and implementation process, and process improvement. The questions will help guide staff on key considerations that will help with determining the potential impacts of shelter eligibility changes and support informed policy recommendations.

A. Policy Overview and Context	
Describe the Proposed Change	• What specific eligibility criteria are being changed? • Who is affected? (e.g., demographics, status, needs) • What is the intended purpose or outcome? • Is the change driven by municipal, provincial, or federal requirements?
Scope and Timing	• Is the change temporary or permanent? • When will the change be implemented?
B. Equity and Human Rights Analysis *Use the following Toronto Housing Charter principles to assess alignment*	
Right to Housing **Charter Principle:** *"All residents have the right to a safe, secure, affordable and well-maintained home."*	• Does the change risk displacing excluding, or negatively impact equity-deserving groups (e.g., Black residents, Indigenous people, newcomers, and others overrepresented among those experiencing homelessness)? • Is access to shelter being made conditional in a way that impacts a person's right to adequate housing? • If so, does it propose alternative pathways or supports towards a person's right to adequate housing?
Non-Discrimination and Inclusion **Charter Principle:** *"All residents should have barrier-free access to housing and housing supports*	• Does the policy discriminate on any prohibited ground under the Ontario Human Rights Code (e.g., race, gender, disability, or immigration status? • Were equity-deserving groups (e.g., Black residents, Indigenous people, newcomers, and other overrepresented groups experiencing homelessness) who may be impacted by this change consulted in its development?

without discrimination."	• Is the change applied consistently across populations?
Equity and Accessibility **Charter Principle:** *"Some individuals and communities face barriers that require tailored supports."*	• Does the change consider the impacts to accessibility to service users impacted by the changes. • Is there a process to accommodate individuals who are impacted by the change up to the point of undue hardship. • Are supports enhanced or reduced for people with disabilities or mental health needs? • Has language, mobility or cultural accessibility been considered? • Which equity-deserving groups are specifically impacted and to what extent is a more individualized approach necessary, based on the unique circumstances of these populations?
Participation and Accountability **Charter Principle:** *"Housing policies should be developed with transparency, accountability and community participation."*	• Was there meaningful consultation with service users, community organizations and frontline workers? How will these stakeholder groups be reached during implementation? • Is there an adequate appeals process embedded into shelter eligibility changes? Are outcomes tracked and reported?
Ontario Human Rights Commission: Housing as a human right **Charter Principle:** *"Access to housing is fundamental to dignity, well-being, and community participation."*	• Is this change retrogressive, meaning that it undermines the City's progress towards advancing the right to adequate housing? • Does this change delay or impact the City's efforts to ensure substantive equality for all people experiencing homelessness? • Does this change use the maximum available resources to progressively realize the right to adequate housing?
C. Risk and Strategic Impact Assessment	
Conduct Equity Impact Analysis	• Use tools such as the City of Toronto's Equity Lens. • Include potential unintended consequences.
Identify Disproportionate Impacts	• On marginalized populations (e.g., trans people, newcomers, people who use substances, those living with disabilities). • Have staff in the City's Confronting Anti-Black Racism Unit, the Toronto Newcomer Office, and other relevant internal experts been consulted on the potential impact?

Public Perception/ Reception Impact	• Consider how the public (e.g., media, advocacy groups, etc.,) will view this change. • Consult with communications to create a plan for how to respond to public questions or concerns about the decision.
Legal Review	• Have City staff in Legal Services been consulted to ensure that decision is informed and in alignment with Ontario Human Rights Code and the Canadian Charter of Rights and Freedoms?
Mitigation Strategies	• Are there recommendations to modify or complement the change? • Where a potential adverse impact has been identified, what mitigation strategies or alternative supports have been considered or identified? How will those be communicated to those implementing the change and those impacted? • How will the monitoring and evaluation process document steps taken to assess, mitigate or remove any barriers that have been identified? • Provide suggestions for enhanced supports or exceptions.

D. Operational Impacts of Eligibility Changes

Occupancy & Demand	• Will it increase shelter demand or increase the number of people being unmatched to a shelter bed? • How does it affect sector-specific or seasonal pressure?
Length of Stay & System Flow	• Will it impact how long people stay? • Does it create bottlenecks at intake or exit?
Intake & Referral Processes	• Are new protocols, tools, or training needed? • Does it affect SMIS or Central Intake workflows?
Displacement & System Pressures	• Where will individuals impacted by the policy change go (e.g. streets, hospitals, justice)? • Will other systems absorb the impact?

E. Implementation and Monitoring

Ease of implementation	• Can this change be easily and quickly integrated into current shelter intake and case management procedures? • Is additional training required for implementation? • Have available resources been identified to ensure consistency in implementation across the system • Identify the stakeholders/team(s) leading the implementation
Data & tracking	• Determine how change will be tracked and develop implementation indicators (i.e., what metrics will be used to determine if change has been consistently integrated across the system)

	• Determine what the intended outcomes are for change and develop indicators that demonstrate that that outcome is being achieved • Determine what tools will be used to collect data (e.g., SMIS) • Develop evaluation milestones and determine clear timelines • Develop a process or strategy for communicating implementation indicators and related change publicly
Mitigation and alternatives	• Have other options been explored for achieving identified outcomes without making the change? • What is the rationale for not pursuing alternative(s)? (e.g., negative impact on other shelter user population, lack of resources to implement) • Are alternative accommodations to emergency shelter for impacted population(s) available?

Shelter Eligibility Change: Charter Alignment & Equity Impact Assessment Tool

The following tool is meant to inform decision-making around changes to shelter eligibility criteria and assist with implementation of the Framework in this process. Use the below tool to help assess alignment of decision with the Framework.

Alignment Rating	Description
Fully Aligned	• The proposed change supports **all Toronto Housing Charter principles and is guided by the frameworks and legislation cited in this document**. • Equity impacts are **identified and mitigated**. • **Meaningful engagement** was conducted with affected communities. • The change enhances or maintains access to shelter for **vulnerable groups**. • The change is consistent with the obligation to devote the maximum available resources to the progressive realization of the right to housing, with supports for long-term stability.

Partially Aligned	• The policy supports **some principles**, but may:
	    o Have **some negative equity impacts**, with **partial mitigation**.
	    o Reflect **inconsistent application** or lack of consultation.
	    o Neutral on some Charter values (e.g., no active harm, but no improvement).
	
	• There are **areas for improvement or amendment**, but not total rejection.

Misaligned	• The policy **undermines** one or more key Charter principles. • There are **discriminatory effects**, exclusion, or **increased barriers** for marginalized groups. • There is a **lack of consultation**, accountability, or mitigation. • The policy shifts toward, exclusion, or reduced access without due process. • Risks are **unmitigated.**
Recommendation	☐Approve ☐Amend ☐Delay ☐Reject ☐Suggest further consultation or pilot testing

9. Implementation of the Framework

The following is a process checklist, to ensure consistency in the process for considering shelter eligibility changes at TSSS:

1. **Research**
    - Reviewing legislation and government policies or related resources
    - Reviewing TSSS and the City's policies related to the issue (i.e. any changes 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, The City's Anti-Black Racism Action Plan and Reconciliation Action Plan)
    - Conducting jurisdictional or environmental scans and literature reviews
    - Utilizing existing program data or service user information

2. **Consultation and engagement**
    - Conduct consultations and research methods, such as:
        - Speaking with staff and/or service users;
        - Facilitating targeted focus groups or conducting surveys;
        - Consulting with internal experts, such as Legal Services, the City's Human Rights Office, the Confronting Anti-Black Racism Unit, the Toronto Newcomer Office and other relevant internal experts before implementation.
        - Consulting with the relevant union(s), as needed.

3. **Analysis of proposed change**
    - Including equity impact analysis and alignment with Toronto Housing Charter
    - Complete analysis using the table in the **Access to Shelter Framework**

4. **Approvals**
    - Drafting of eligibility changes through a formal policy template (e.g. Directive, Bulletin).
    - Document approval through an Authorization Memo, with sign off by the General Manager, Toronto Shelter and Support Services.
    - Authorization Memo is subject to the City's retention policies.

5. **Communication, Implementation & Monitoring**
    - Information on changes to shelter eligibility to be shared with impacted City divisions, sector partners, service providers and the public, including sharing the policy document (e.g. Directive, Bulletin) on the City's webpage.
    - Supporting resources such as an interpretation guide to be developed during implementation to support consistent understanding and application of the Framework across staff and stakeholders.
    - Ongoing review and monitoring of shelter eligibility changes to ensure they are effectively implemented, equitable, and aligned with key human rights policies. This may include mechanisms for tracking implementation progress, evaluating impacts on service access and equity, and ensuring sustained alignment with human rights policies and the Toronto Shelter Standards.