

November 19, 2025

Assessing Changes to the Interdivisional Protocol on Encampments (IDP) for Alignment with the Toronto Housing Charter

To members of the Housing Rights Advisory Committee,

As a member of the Housing Rights Advisory Committee (HRAC) and Chair of its Supporting Unhoused Rights Holders Working Group, it is imperative to my work — and the broader work of the Committee — that the rights of people who are unsheltered and living in encampments are both respected and upheld in the City of Toronto's policies and practices.

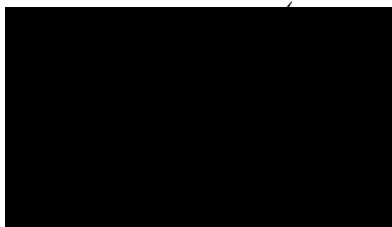
It is therefore of the utmost concern that recent changes to the Interdivisional Protocol on Encampments (IDP), [passed by City Council on November 14th 2025](#), represents retrogression — a violation of unhoused people's human rights. These changes effectively suspend human rights for encampment residents within prescribed "bubble zones," including by placing a limit on the number of shelter offers a resident can receive. This is a deliberate incursion on the established human rights principles set out in the original IDP, i.e., retrogression.

Recommendation:

That the Housing Rights Advisory Committee recommends that:

City Council request that the General Manager, Shelter and Support Services ensure that any changes to the Interdivisional Protocol on Encampments (IDP) be assessed for compliance with the City's obligation to realize the right to adequate housing, as affirmed in the Toronto Housing Charter, national and international law, and be undertaken in consultation with the Housing Rights Advisory Committee.

Many thanks for your time and attention,



Diana Chan McNally
Member, Housing Rights Advisory Committee