



Item 2026.PH30.3

Dear Council,

We are writing regarding **3838 Bloor Street W**. While we appreciate that this shelter will exclusively serve women (more later re: Sexual Assault Awareness Month), the process leading to this report, this location, and this decision was filled with inconsistencies. It leaves many of us feeling that democracy is not working; not only are we shut out of decisions affecting our neighbourhoods, so are the people who represent us at this very council.

City Council delegated authority to CREM to acquire shelter properties under the *Homelessness Services Capital Infrastructure Strategy (HSCIS)*, a plan to deliver **1,600 beds across 20 sites, over ten years (2024–2033), averaging 80 beds per site, with an initial accessibility commitment of 25,000 square feet in size.**

That model was the financial basis for Council's approval. In total, **the 20 permanent 80-bed shelters save \$3.7 million annually per site over the hotel model** no longer needed post COVID.

Beyond informing the City's capital spending decisions, **the HSCIS was developed proactively to promote recovery and stability in the City's shelter system.** The focus was on longer-term, purposebuilt, **smaller sites, in alignment with the Shelter Design and Technical Guidelines**, that can be more accessible, safer, more responsive to the diverse needs of shelter clients and the surrounding community, and more easily converted into housing in the future.

The HSCIS was approved to deliver a new approach to the shelter system, and as a system-level plan premised on consistent, replicable sites, that delivers financial efficiencies and stability in the long-term.

Staff chose to advance a bundle of six sites in a single report, rather than individually. In the background, the *staff report for the six sites had **changed 25,000 to 20,000 square feet, 80 beds became "50 to 80 beds," and three of the six came in below even the reduced 20,000 sq ft (1,858 m²) floor area.*** While these may seem like small changes on paper, they rebalance the strategy and financial equation for which delegation was granted.

None of these changes went back to Council. Each was absorbed into staff reports as though the original parameters had never existed.

Under City of Toronto Municipal Code Chapter 71, delegated authority cannot be exercised outside its defined limits. *Municipal Code Chapter 213, Real Property General Condition (C) of Appendix B* requires that delegated authority complies with all applicable Council policies. **The HSCIS criteria, including the 80-bed standard, the floor area benchmark, program design requirements, and the resulting efficiencies are Council-approved policy adopted through EC7.7. and are the very same boundaries assigned to staff.**



Where staff have exercised delegated authority to acquire sites that **systematically fall below (or above) those criteria**, and where **staff have amended the criteria themselves without returning to Council**, there is a legitimate question as to whether those transactions remain within the scope of the delegation as authorized, compounded by **unresolved appraisal and fair-market-value concerns under Chapter 213** (*to be addressed in a future communication*).

Sites: 11 advanced (2027 Shelter Infrastructure Plan) / 20 new HSCIS sites.

Beds: 1057 individual beds confirmed of 1,600 needed.

Criteria Met:

Beds

2/11 - exceed 80 beds or “small site” shelter plan

4/11 - are below 80 beds

5/11 - meet the target = 45%

Size

3/11 are below 1,858.1 m² / 20,000 sq ft gross floor area - *concerns about whether 66 Third St provides enough room for seniors to live with dignity is in debate*

2 /11 fall below per person space of 23.23 m² (1,858 /80)

6/11 - meet or exceed an appropriate gross floor area = 55%

Green Space

4/11 sites highlight issues with available green space

7/11 - may meet the criteria (TBC) = 63%

1/11 sites confirmed the absence of a pet relief area

Appraisal and Fair-Market-Value

In the recent report: 11 HSCIS sites. Attachment 1, Table 3 provides details on the properties acquired, including the purchase price. is the first disclosure of costs for all sites, including costs above the \$10M approval threshold.

4/11 held surplus land processes (TBC)

3/7 fell below \$10M (7 purchased sites)

4/7 exceed the threshold

5/7 - rationales for purchase price are still unavailable to the public

The **cost-per-bed rationale that justified the HSCIS to Council only holds if beds actually average 80**. If they don't, either the capital cost per bed goes up significantly, or the operating savings projection of the \$126 per person (per night) vs. \$253 per person (per night) in the hotel model doesn't materialize at the scale assumed.

When the site exceeds 80 beds, it contravenes the approved HSCIS focus on longer-term, purpose built, **smaller sites**, in alignment with the Shelter Design and Technical Guidelines.

Table 2 - New Shelter Design - online toronto.ca



New shelters in Toronto will be thoughtfully designed to meet the diverse needs of people experiencing homelessness and support community integration, in alignment with best practices outlined in the [Shelter Design and Technical Guidelines](#). Shelters will be purpose built to promote dignity, comfort and prepare residents for independent living.

New sites will:

- Serve approximately 80 people, featuring fewer beds per room
- Have thoughtfully designed exteriors to help integrate into surrounding communities
- Include space for on-site meal preparation, along with communal dining and program rooms
- Be designed to be less institutional and more home-like, featuring natural materials and amenity spaces
- Feature inclusive design that considers demographics of the shelter, such as colours, art and symbols to make people of different backgrounds feel welcome
- Accommodate pets and be accessible
- Support health and wellness through the inclusion of flexible on-site spaces for counselling, primary and mental health care services
- Follow trauma-informed design principles by considering the mental and emotional well-being of shelter residents, providing clear lines of sight and reducing or removing stressors, where possible
- Provide outdoor restorative amenity spaces to support programming and enable shelter residents to connect with nature and each other
- Where possible, include shared space that can be used by the community

The 2024 Shelter Infrastructure Plan and the Homelessness Services Capital Infrastructure Strategy (HSCIS) - says 80 beds 25 times.

Last week, Councillor Kandavel asked about delegated authority regarding the assignment of populations to shelters. While we acknowledge that this particular site at 3838 is women-focused, **we are concerned that decisions made by staff to mix genders, without proper consultation, will place women, girls, and gender diverse people in greater harm.**

In July 2023, this council Declared Gender-Based Violence and Intimate Partner Violence an Epidemic. With an action to find the best ways to actualize this declaration through community safety, wellbeing, and other related plans and making meaningful investments to the programs and services that prevent intimate partner and gender-based violence and support those who face it.

Taking Action on the Declaration of Intimate Partner Violence as an Epidemic from December 2023, includes this reason for urgency: “in 2022, 6,752 calls were made to the Assaulted Women’s Helpline from women seeking safety in violence against women shelters in Toronto but **only 10 percent of them secured a violence against women bed due to capacity.**”

Additionally, SafeTO commits this council to 2.2 *Develop a Comprehensive Gender-Based and Intimate-Partner Violence Reduction Strategy*, with a completion of “**by Q4 2027.**” **Which feels quite late for an epidemic.**

In 2024, CAMH provided a report “The Shelter Safety Study” which confirmed that relative to the number of users served, **mixed-adult shelters experienced more incidents than the other sectors, followed closely by youth:**

Rates of Physical and Interpersonal Violence Per 1,000 Service Users Between 2012-2021 by Sector

Sector	% of Total Program-days (314,684)	Physical Violence (9,344)		Interpersonal Violence (22,801)	
		% of Incidents	Rate per 1,000 Service Users	% of Incidents	Rate per 1,000 Service Users
Adult Men	35.5	44.4	0.71	43.1	1.68
Adult Women	21.4	9.7	0.40	11.3	1.13
Mixed Adult (All Gender)	17.1	32.1	0.96	31.3	2.29
Youth	14.1	11.9	0.75	12.6	1.94



Rates of Property Damage and Thrown Objects Per 1,000 Service Users Between 2012-2021 by Sector

Sector	% of Total Program-days (314,684)	Property Damage		Thrown Objects	
		% of Incidents (3,331)	Rate per 1,000 Service Users	% of Incidents (3,311)	Rate per 1,000 Service Users
Adult Men	35.5	33.7	0.19	35.5	0.18
Adult Women	21.4	12.00	0.17	21.4	0.22
Mixed Adult (All Gender)	17.1	38.4	0.41	17.1	0.40
Youth	14.1	14.8	0.33	14.1	0.33

Rates of Suspected Overdose and Self-Harm Per 1,000 Service Users Between 2012-2021 by Sector

Sector	% of Total Program-days (314,684)	Suspected Overdose		Self-Harm	
		% of Incidents (3,528)	Rate per 1,000 Service Users	% of Incidents (2,832)	Rate per 1,000 Service Users
Adult Men	35.5	32.1	0.19	27.5	0.13
Adult Women	21.4	8.6	0.13	16.4	0.20
Mixed Adult (All Gender)	17.1	51.1	0.58	28.7	0.26
Youth	14.1	7.3	0.17	25.7	0.49

They included the following quotes:

“ They need to talk about the issues that are relevant for myself, as a Black woman, issues around violence against Black women is very relevant to me and that happens a lot in here ... those things should be talked about because we, as Black women, we experience more violence than any other race, you know what I mean? It’s just terrible. We go through depression and all these things because of that.

- shelter staff (direct service)

“ It made me paranoid because I wouldn’t know where he is. Like, I knew he would access the other drop-in, which is why I didn’t go, and I knew which shelter he was staying at, so I wouldn’t go to that part of the city, in case I did see him.

- female youth experiencing homelessness

“ Verbal abuse of women in the shelter is the order of the day. You know, it’s you getting called bitches and whores and all kinds of names. I remember doing bed check with somebody who kept saying [misogynistic comments] and I remember getting very upset ... and getting really scared.

- shelter staff (direct service)

“ He started picking on me, verbally abusing me, using very discriminatory names toward me, derogatory names, like just very disgruntled towards women. So, he picked on the way I look or the clothes that I’m wearing and he’d be like, ‘You know what? You look like a prostitute. You’re a whore. Why don’t you go back to your whore house?’

- adult woman experiencing homelessness

A Canadian study titled “Evidence-informed interventions and best practices for supporting women experiencing or at risk of homelessness: a scoping review with gender and equity analysis” included that **“of the 4102 articles identified on homelessness interventions, only 4 systematic reviews and 9 randomized trials were exclusively conducted on women or published disaggregated data enabling a gender analysis.”** Which is sadly unsurprising. Further:

“On Average, One Woman In Canada Is Killed By Her Intimate Partner Every 5 Days.”



“Over 40 000 women and their 27 000 children resort to living in shelters across Canada each year, with approximately 3600 women and their 3100 children staying in shelter facilities on any given night.”

Shelters are a means to escape:

1. emotional or psychological abuse (89%);
2. physical abuse (73%);
3. financial abuse (51%);
4. sexual abuse (33%);
5. human trafficking (3%) and
6. forced marriage (2%)

According to “Homelessness Data Snapshot: Youth homelessness in Canada” there is **“a higher proportion of women (42%) and gender-diverse people (6%) among youth aged 13-24 experiencing homelessness, compared to adults aged 25 and above (32% women and 2% gender-diverse).”**

In “ACT NOW: PREVENTING HUMAN TRAFFICKING OF WOMEN, GIRLS AND GENDER DIVERSE PEOPLE IN CANADA” **Several factors and life experiences can make people more vulnerable to human trafficking, including:**

1. **experiencing poverty**, isolation and lack of family support;
2. being a survivor of abuse in childhood; struggling to secure affordable housing or **being homeless**, and facing barriers because of a disability, language skills; and
3. mental health issues or trauma, including traumatic brain injuries.

Kyla Clark, Program Coordinator at *Creating Opportunities and Resources Against the Trafficking of Humans*, referred to these as **“invisible identities.”** Many witnesses explained that **traffickers are exploiting vulnerable individuals** who are socially isolated or do not have their basic needs met, such as financial **and housing needs**. For young women and girls **“Ultimately, it's because they don't have a place in society.”**

So, even before a final SafeTO strategy exists, **we have many data points that indicate a girl, woman, or gender-diverse person experiencing homelessness is likely:**

- fleeing harm;
- that women most often flee with their children;
- that mixed-gender adult, followed by youth shelters experience more adverse incidents, significantly more in fact than single gender, women based shelters (often by 40-50%);
- that drug use causes additional violence, with violence and overdose creating additional trauma.

Why would we permit mixed-gender housing in our go forward plan? And why would this be a delegated decision without appropriate input?

May is Sexual Assault Awareness Month. An important time to raise these concerns, and an important time to commit to acting on behalf of the vulnerable women, girls and gender-diverse



persons, by challenging the staff decision to create state-funded, trauma-inducing homes, that will no doubt perpetuate the re-use of the shelter system.

Delegated authority must not be allowed to be arbitrary, veer off strategy or a council-approved framework, and certainly not used to cause harm (intentionally or not) to the people they serve.

Sincerely,

S.White

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