

Establishing Limited Legal Services at The 519 Church Street Community Centre

Date: July 7, 2026

To: Executive Committee

From: City Manager

Wards: Toronto Centre

SUMMARY

This report responds to Executive Committee's request to explore the establishment of legal services, including measures addressing risk, liability and accountability for the 2SLGBTQ+ community at The 519 Church Street Community Centre (The 519), in consultation with the City Solicitor and the Executive Director of The 519 (Item [EX32.16](#)).

This report recommends that City Council authorize The 519 Board of Management to establish limited and direct legal advice to clients of the 2SLGBTQ+ community, subject to several risk mitigation and accountability conditions, including eligibility criteria, outlined in Attachment 1 to this report. City Council's authorization would result in an amendment to the scope of programs and services offered by The 519 under the Council-approved [Relationship Framework](#).

Establishing limited legal services within The 519 reflects a community-led, rights-based approach that prioritizes accessibility, trust, and culturally responsive service delivery. The proposed model would allow The 519 staff lawyers and a paralegal to provide limited and direct legal advice and brief services to clients who fall outside the reach of existing legal aid programs, pro bono services, and community legal clinics. This report identifies the benefits of providing specialized legal services for eligible members of the 2SLGBTQ+ community as well as the potential risks of the program identified by City staff, including accountability measures, potential conflicts of interest, and others. The 519 staff lawyers and paralegal, while City employees, are not part of the City's Legal Services Division.

The risk mitigation and accountability conditions in Attachment 1 will form the required amendments to Schedule 1 of The 519 Church Street Community Centre of the AOCC Relationship Framework, should City Council authorize the establishment of limited legal services at The 519.

RECOMMENDATIONS

The City Manager recommends that:

1. City Council amend Schedule 1 - 519 Church Street Community Centre of the Relationship Framework for the City of Toronto and Association of Community Centres (AOCCs) Boards of Management, to authorize the Board of Management for The 519 Church Street Community Centre to establish limited legal services to eligible members of the public in accordance with:

- a. all requirements of the Relationship Framework and Former City of Toronto Municipal Code Chapter 25, Community and Recreation Centres; and
- b. the risk mitigation and accountability conditions set out in Attachment 1 to this report.

FINANCIAL IMPACT

There is no financial impact on the City's core administrative funding for The 519 from the implementation of the recommendations in this report.

The 519 has independently raised funds for programming, including a three-year grant from the Law Foundation of Ontario to implement limited, direct legal support services for 2SLGBTQ+ individuals who are unable to access legal aid, with a particular focus on trans women, gender-based violence survivors, newcomers, and refugees.

The 519's overall 2026 Access to Justice Department budget is \$643,000, including \$138,000 allocated annually for limited, direct legal services advice and representation. This funding supports three staff members delivering these services as part of their job function, as well as the associated licencing and insurance costs. The budget is sustainable and provides a foundation for continued implementation into 2027.

Services to clients are capped at a limit to the number of service hours within the program's financial capacity. Therefore, there is no request or expectation of additional core City funding to implement the program.

The Chief Financial Officer and Treasurer has reviewed this report and agrees with the information presented in the Financial Impact statement.

EQUITY IMPACT STATEMENT

Strengthening Access to Specialized Legal Supports for 2SLGBTQ+ Communities

The proposed shift to an in-house, staff-led legal services model at The 519 is intended to address persistent inequities in access to justice experienced by 2SLGBTQ+

communities, particularly those with intersecting disadvantages, survivors of gender-based violence, newcomers, and refugees. Evidence gathered through The 519's program delivery, stakeholder engagement, and service data indicates that many individuals face structural barriers to accessing legal support, including ineligibility for Legal Aid, financial constraints, and limited availability of culturally competent and tailored services.

The 519 reports that their current volunteer-lawyer network, while valuable, is insufficient to meet the scale or complexity of demand, with documented waitlists and a growing number of individuals with unmet legal needs. The proposed model will complement pro bono services by enabling direct intervention for individuals who cannot access support through existing channels, at no additional cost to the City. By prioritizing clients experiencing intersecting disadvantage — such as poverty, systemic discrimination and precarious immigration status — The 519 model advances equitable access to timely and appropriate legal support aligned with City priorities related to advancing inclusion, reducing harm, and improving outcomes for vulnerable populations.

Recent federal policy changes affecting refugee determination processes are expected to increase legal precarity for claimants, including tighter timelines and reduced access to hearings. These changes disproportionately impact 2SLGBTQ+ individuals and survivors of violence, who may require additional time to safely disclose experiences, increasing the urgency for accessible legal advice and representation. The proposed in-house model enables timely, specialized legal intervention, helping to mitigate risks of adverse outcomes, including removal to unsafe environments.

Delivering limited legal services within The 519 strengthens equity through culturally competent, community-based service provision, integrated with existing social, settlement, and anti-violence supports. As a trusted City agency with longstanding relationships, The 519 is uniquely positioned to address key service gaps within the broader legal ecosystem where many individuals fall outside eligibility criteria or lack access to appropriate expertise, leaving them unrepresented and requiring them to navigate complex legal systems on their own.

DECISION HISTORY

On June 16, 2026, the Executive Committee adopted the item titled, "Exploring Legal Services for the 2SLGBTQ+ community at The 519 Community Centre", which requested the City Manager, in consultation with the City Solicitor, to submit a report to the July 21, 2026 meeting of the Executive Committee on development of a proposal of The 519 Church Street Community Centre to establish a legal clinic, including measures addressing risk, liability and accountability.

<https://secure.toronto.ca/council/agenda-item.do?item=2026.EX32.16>

On October 15, 2024, the Two-Spirit, Lesbian, Gay, Bisexual, Transgender and Queer Advisory Committee received the item for information, entitled "The Access Plan for Two-Spirit, Trans and Non-Binary Youth", which is the City's first coordinated initiative to improve health and social outcomes for gender-diverse people in Toronto. The Access

Plan builds on the Toronto Youth Equity Strategy (adopted by City Council in 2014) and prioritizes service and program access, especially for youth with intersecting experiences of systemic marginalization, through enhancements to the design and delivery of existing programs and services and development of new ones.

<https://secure.toronto.ca/council/agenda-item.do?item=2024.QS5.2>

City Council at its meeting of July 24 and 25 2024 adopted the report titled, "Transmittal of The 519 Board of Management General By-law No. 2", which approved a new governance policy and procedural by-law to govern the board meetings of The 519 and expanded The 519's catchment area.

<https://secure.toronto.ca/council/agenda-item.do?item=2024.EX16.6>

City Council at its meeting of April 12 and 13, 2011, adopted the report titled, "Managing Through Agencies and Corporations", in which Council endorsed accountability mechanisms such as requiring Council to approve the board by-laws of all agencies that regulate the internal conduct of the business and affairs of the agency.

<https://secure.toronto.ca/council/agenda-item.do?item=2011.EX4.6>

City Council at its meeting of September 25, 26 and 27, 2006, adopted the Relationship Framework for City of Toronto with Boards of Management of the 10 AOCC Community Centres in Clause 17, Report No. 7 of the Policy and Finance Committee.

<https://www.toronto.ca/wp-content/uploads/2017/08/971c-spc-community-centres.pdf>

The mandate and governance structures of Community Centre Boards of Management are set out in Former City of Toronto Municipal Code, Chapter 25, Community and Recreation Centres, adopted as By-law No.1994-0792 on October 11, 1994. [Toronto Municipal Code Chapter-25.pdf](#)

COMMENTS

Governance Overview

The City has 10 community centres that are managed, operated and maintained by volunteer Community Centre Boards of Management that are collectively referred to as the Association of Community Centres (AOCCs). The AOCCs are multi-purpose facilities that provide public space, programs and services to meet the recreation and social needs of local communities. They were established to foster a sense of community, promote civic engagement and enhance quality of life through community, recreational and social service programs.

The Board of Management for The 519 is one of the 10 AOCC Boards of Management. The 519 is a City Board and Local Board of the City under the City of Toronto Act, 2006. The board is governed by, and acts in accordance with, the authorities delegated to it by City Council through Former [Toronto Municipal Code Chapter 25, Community and Recreation Centres](#) and a Council-approved [Relationship Framework](#) that sets out the Board of Management's governance structure, legislative and policy framework and its accountabilities to the City.

The 519 Board of Management Structure

The 519 Board of Management is composed of twelve members: eleven persons who are appointed by the Toronto and East York Community Council under delegated authority through the City's Public Appointments process, and the member of Council for Toronto Centre (Ward 13) by-right-of-office. Per the Relationship Framework, the majority of public board members must be residents of The 519's catchment area. The Board of Management elects a Chair and may elect a Vice-Chair from among its members.

The 519 Board of Management Mandate

The mandate and governance structures are set out in the former City of Toronto Municipal Code, Chapter 25, Community and Recreation Centres. Under Chapter 25, Council has delegated authority to The 519 to "manage and control the premises as a community recreation centre", which is the building located at 519 Church Street.

The Council-approved Relationship Framework with the 10 AOCC Boards of Management further defines the relationship between the City and the boards and sets out Council's delegations of authority and expectations for each board. Under the Relationship Framework, all AOCC boards have delegated authority over "the development, funding, management and operation of community centre programs." Boards must operate in accordance with all applicable law, including City by-laws and applicable City policies including the City's human resources and employment-related policies.

The establishment of limited and direct legal services at The 519 is a unique proposal. No other AOCC provides legal advice and services directly to the public. The proposed legal services at The 519 falls outside the scope of what would be offered at a "community recreation centre", which requires City Council approval to expand the authority granted to The 519 under Chapter 25, City of Toronto Municipal Code and the Relationship Framework in order for The 519 to provide this program.

The core administrative activities of the AOCC community centres are funded by the City of Toronto, while the proposed limited legal services are funded primarily through received grants and donations.

Social Profile of The 519

The 519 as a Vital Community Anchor for Equity-Deserving Populations

The 519 is located in the Church-Wellesley Village. The 519 serves a highly diverse and intersectional population and plays a critical role in delivering programs, services, and spaces that promote inclusion, well-being, and civic participation among equity-deserving populations who experience structural barriers and systemic inequities. This includes 2SLGBTQ+ individuals, racialized and Indigenous community members, newcomers, low-income individuals, those experiencing housing instability or homelessness, youth and seniors within 2SLGBTQ+ communities, refugees and

individuals with precarious immigration status, and persons facing multiple and intersecting forms of marginalization.

The populations served by The 519 often encounter complex and overlapping social challenges, including discrimination and exclusion, barriers to service access, mental health challenges and social isolation, increased risk of homelessness or housing precarity with limited access to affordable housing and vulnerability to violence and harassment. All these factors intersect and contribute to increased demand for supports related to food security, legal assistance, and social services.

The 519 functions as a trusted and inclusive community anchor that provides low-barrier access to programs, social supports and information, safe and affirming spaces, opportunities for community connection, capacity-building, and civic engagement, integrated and wraparound supports through partnerships with community organizations and service providers. The 519 has strong connections within 2SLGBTQ+ communities and is widely recognized as a safe and welcoming space. Its programs and outreach efforts facilitate engagement with individuals who may otherwise remain underserved or disconnected from formal systems. Its role as a community hub and service provider is essential in addressing social, economic, and legal disparities, while fostering inclusion, resilience, and equitable access to services.

Social Justice Considerations

Addressing Systemic Barriers Through In-House Legal Services at The 519

The proposed introduction of direct, in-house legal services at The 519 is grounded in a social justice framework that responds to persistent structural inequities. The 519 has identified significant barriers that limit equitable access to legal systems by 2SLGBTQ+ communities. Many clients are unable to access existing legal support, and reliance on pro bono legal services is insufficient to meet the growing demand, particularly for individuals with urgent or complex cases. The proposed model seeks to address these gaps by providing targeted, low-barrier legal services to individuals who would otherwise remain unrepresented.

The initiative is informed by the disproportionate impacts of systemic harm experienced by 2SLGBTQ+ communities, including discrimination, violence, or housing instability. Legal needs are frequently closely tied to immediate risks to safety, security, and well-being. Providing direct legal services enables timely intervention and supports stabilization for individuals facing heightened vulnerability.

Integrating legal supports with existing programming strengthens coordination and aligns with the agency's mandate to address unmet needs. Overall, the model represents a targeted equity intervention that reduces barriers, prioritizes high-need individuals, and supports improved safety, stability, and outcomes for 2SLGBTQ+ residents.

Legal Aid Ontario: Overview, Scope and Limitations in Services

Overview

In Ontario, Legal Aid Ontario (LAO) plays a key role in providing legal help to financially eligible low-income Ontarians. LAO is a Provincial corporation established by the Ontario Government under the Legal Aid Services Act, 1998. LAO is independent from, but accountable to, the Provincial government and is overseen and managed by a board of directors appointed by the Lieutenant Governor in Council on the recommendation of the Attorney General and, for some directors, the Law Society of Ontario.

LAO is funded primarily by the Provincial Legislature, though the corporation can enter into arrangements for funding from other sources as well. LAO provides legal aid services to Ontarians in a variety of ways, including directly by LAO lawyers and staff, through the certificate program which allows individuals to retain private lawyers who receive payment from the LAO for their services and through clinics which are funded by, but operate independent of, LAO. Attachment 2 to this report provides additional information on the objects and functions of the LAO.

Summary of LAO's Coverage and Existing Gaps

Low-income clients living well below the poverty line do not meet the financial eligibility cut-off for LAO certificates and clinics. A certificate confirms Legal Aid Ontario, on approval of an application, will cover the cost of a private lawyer who accepts legal aid work for a certain number of hours. LAO has strict financial eligibility criteria set by the Legal Aid Services Act, 2020, well below the poverty line. A single person seeking a certificate must make below \$18,795 annually to be eligible for Legal Aid assistance.¹ To address this income eligibility cut-off, The 519's proposed legal services are intended to support individuals with an annual income below \$50,000 (unless very specific extenuating circumstances are met such as a survivor of gender-based violence who has no access to their assets due to financial abuse). Detailed eligibility criteria for The 519's proposed legal services are outlined in Attachment 1.

LAO certificates and clinics cover only distinct types of issues and applications; thus, large gaps exist in coverage. LAO certificate hours are limited so that the hours may run out before the legal issue is resolved. Most LAO clinics have lengthy waiting lists or are forced to turn clients away. As a result, extremely vulnerable, marginalized clients often are not able to access adequate legal services.

There is currently no specialty LAO clinic for 2SLGBTQ+ clients. The 519 proposed legal services are intended to bridge the LAO financial and program gaps for vulnerable clients that do not meet its eligibility criteria. The 519 would be augmenting this Provincially mandated program.

Risk Mitigation and Accountability Measures

The City recognizes the importance of social, recreational and community programs as essential to the well being and quality of life of its citizens and communities. In 2001 when Council adopted the [Social Development Strategy for City](#), Council recognized the important contribution of community programs towards enhancing social equity, social

¹ Source: [Legal Aid Ontario Eligibility Table](#).

well being and citizen engagement. Each year, AOCCs deliver over 1,220 inclusive programs and services in more than 25 languages, reaching more than 235,000 unique individuals across Toronto.

One of the City's strategic objectives for board-run community centres is to provide programs and services that are responsive to and reflective of the unique needs of local communities, or a common interest group in the broader community, by having community members make decisions about what programs to provide.

City staff recognizes that this program is a unique extension of current programming offered by a City of Toronto agency that goes beyond the scope for the AOCC Community Centres contemplated in Chapter 25 and the Relationship Framework, and while it fills a gap in current access to justice channels, there are potential risks and liabilities associated with the direct delivery of legal services by AOCC staff who are City employees.

This report recommends that City Council require compliance with the following conditions to avoid undue exposure of the Board and City to potential complaints and litigation. The conditions are set out in greater detail in Attachment 1 which would form an amendment to Schedule 1, The 519 Church Street Community Centre, of the Relationship Framework.

Conflict of Interest Policy

The 519 shall ensure compliance with all applicable conflict of interest legislation, and City of Toronto bylaws and policies. No legal services will be provided where a real or perceived conflict of interest exists, including instances where the subject matter involves the City of Toronto, its Agencies and Corporations.

No legal services provided by The 519 should include actions against the City of Toronto, or its Agencies and Corporations. Conflicts of Interest with the City of Toronto are avoided by the implementation of a condition restricting the provision of legal services where the City of Toronto, its entities or a City policy or program would have contrary interest or be a prospective opposing party.

Additionally, The 519's lawyers are bound by The Law Society of Ontario's [Rules of Professional Conduct – 3.4-1](#) under 'Relationship to Clients' that outlines clear rules regarding the duty to avoid conflicts of interest which would occur should The 519 lawyers take any action that places them in opposition to City policies and programs, and must therefore be avoided.

As part of the Client and case selection process, The 519 shall conduct an individualized conflict of interest assessment to ensure that any client and or legal matter does not violate the conflict of interest provision outlined in the conditions.

Staffing Structure and Accountability for the Legal Services Work

Staff of The 519 Community Centre are employees of the City, but Council has delegated authority to the Board for the overall management of the community centre

and its employees in accordance with the City's human resources policies and collective agreements.

This report recommends that City Council authorize staff at The 519 to directly deliver legal services to the public, conditional upon requirements for compliance and mitigation of risk which are set out in Attachment 1 to this report, and which will form the amendments to the Relationship Framework.

To ensure centralized accountability, the highest quality of oversight, integration and mitigation of risk, The 519 recommends that legal services providers should be staff at The 519, who are City employees. This places centralized oversight and accountability within The 519 organization and under the authority of the Board of Management that reports to City Council.

The 519 Executive Director is required to provide annual compliance reports to the Board of Management or more as required, to demonstrate compliance with Council / Board of Management directions outlined in the Relationship Framework. The annual compliance report will include a summary of open and closed files in the calendar year, highlighting any identified risks associated with the clinic's practice that year, and a declaration of compliance with Law Society requirements. All employee performance matters are managed in accordance with the City of Toronto Human Resources policies as outlined in the City of Toronto - AOCC Relationship Framework, including explicit advice from the City.

The 519 Board of Management is required to maintain formal delegations of authority to the Executive Director, in compliance with Chapter 192, Public Service, of the Toronto Municipal Code.

The Director of Legal Initiatives at The 519 reports to the Executive Director / Agency Head on this initiative. The Director oversees The 519 Legal Clinic and directly supervises all positions providing direct legal advice. The positions are all non-unionized as they contemplate roles that require supervision of other staff, volunteers and other managerial roles. Currently, the proposed staffing model for providing limited direct legal services includes the Director of Legal Initiatives, one lawyer, and one paralegal.

Legal service professionals are required to be licenced with the Law Society of Ontario, and they are bound by strict professional standards of practice through the Law Society of Ontario's Rules of Professional Conduct. It is a requirement that employees undertaking this work comply with these professional standards at all times while undertaking their duties.

Case Selection Process

Client Selection: As part of the Client selection process, The 519 lawyers shall conduct an individualized conflict check to ensure that any client and or legal matter does not violate the conflict of interest provision outlined in the conditions. This carries forward throughout the time legal services are provided, on an individualized basis.

Exclusion of City Employees: The 519 will not accept any client who is a current or prospective employee of the City of Toronto, its Agencies and Corporations. The 519 will not accept any client who is a former employee of the City of Toronto, its Agencies and Corporations in relation to any matters arising out of their employment with the City of Toronto, its Agencies and Corporations.

Scope and Eligibility of Service / Program

The conditions of scope are:

- No conflicts of interest exist;
- Licenced and insured legal professional staff within The 519's Access to Justice Department provide summary legal advice and limited retainer legal services, excluding civil litigation;
- Legal advice and limited retainer services are only provided in areas of law where legal professionals have capacity, competence and non-City funded resources available;
- No civil litigation advice or limited representation for civil litigation;
- Limited representation is provided; and
- No legal advice shall be provided to The 519, its Board or its employees or agents.

Conditions of eligibility:

- Client identifies as 2SLGBTQ+
- Client's issue is related to a matter based in Ontario
- No other legal services are attainable (e.g. legal aid, private bar, pro bono)
- Client has an annual income less than \$50,000, except in instances where the client is a survivor of gender-based violence who can demonstrate that they do not have access to their financial assets.
- Client is not a current or prospective employee of the City of Toronto, or its Agencies and Corporations
- Client is not a former employee of the City of Toronto, its Agencies and Corporations in relation to any matters arising out of their employment with the City of Toronto, its Agencies and Corporations.

Mitigation of Financial Impact on City of Toronto Core Administrative Funding of The 519

The administration and delivery of the direct legal services shall be conducted to avoid any financial risk to City of Toronto. As this is a program of The 519, the operating costs will be covered by The 519 through other funding sources. The 519 shall raise all program related funds through grants, donations and fundraising. There will be no impact on core City of Toronto funding.

Indemnification and Insurance Measures

- Prior to commencing any legal services, it is required that any retainer between The 519 and its eligible clients who receive legal services should include a waiver or release of liability, which would prevent the client from bringing a legal action or claim against The 519 and/or City.

- Lawyer's Professional Indemnity Company (LawPro) insurance: Employees carrying out the program's legal advice and limited representation must be fully covered as practicing legal professionals under LawPro's liability insurance coverage. This coverage is paid for by The 519 and not the City of Toronto.

The 519 should engage Legal Services for review of their generic retainer agreement language to ensure that it meets the appropriate standards for indemnification and release of liability to prevent legal action against The 519 and/or City.

CONCLUSION

The 519 Board of Management has worked with the local Councillor, staff from the City Manager's Office, Legal Services and Social Development to develop this initiative and mitigate associated risks.

City staff recognize the value and benefits of this initiative for the marginalized communities served by The 519, while balancing their recommendation for City Council approval with appropriate governance and risk management conditions to protect the interests of both the City and the Board of Management. With the recommended guardrails set out in Attachment 1 that will form amendments to Schedule 1, the 519 Church Street Community Centre of the Relationship Framework, and City Council's authority, it is recommended that Council approve the establishment of legal services at The 519.

City Council has authorized the AOCC Boards of Management to request, via the City Manager, City Council consideration and approval to amend the governance structures of their boards set out in their Relationship Framework. Accordingly, this report conveys The 519's request and responds to Executive Committee's direction for City Council's consideration.

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SIGNATURE

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ATTACHMENTS

Attachment 1: Risk, Mitigation and Accountability Conditions

Attachment 2: Background Information on Legal Aid Ontario: Overview, Profile and Scope