

Shelter, Support and Housing Administration

DIRECTIVE

Directive No.: 2023-03

Date Issued: December 18, 2023

Authority

This Directive is issued under the authority of the General Manager of SSHA.

Subject

Confronting Anti-Black Racism standards added to the Toronto Shelter Standards

Directive or Required Action

Direction on Confronting Anti-Black Racism (CABR) standards added to the Toronto Shelter Standards (TSS) in response to Action 10.2 of [Toronto's Action Plan to Confront Anti-Black Racism](#): apply an anti-Black racism (ABR) analysis to shelter standards.

Key Updates

1. *Section 10.3.6 Black Clients* has been added and contains specialized program requirements specific to serving Black clients. This section appears under *Section 10, Management, Supports and Services*.
2. CABR standards have been added to the TSS in the following areas:
 - 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

CABR standards are listed by TSS section in the Directive.
3. Certain existing standards have been revised with a CABR lens. These revisions appear in bold text throughout this Directive.
4. Five definitions have been added, and two updates have been made to the *Training Topics and Professional Competencies Matrix*.

This Directive applies to all shelter providers. The CABR standards and updates will be adapted to the 24-Hour Respite Site Standards in early 2024.

Shelter, Support and Housing Administration

DIRECTIVE

Directive No.: 2023-03

Date Issued: December 18, 2023

Shelter providers are directed to review the CABR standards with staff, senior management, and board of directors and to implement all requirements.

Providers are expected to begin adopting the CABR standards into programs and services immediately and will have until the end of Q4 2024 to implement all the changes.

Section 3 Defined Terms

New definitions:

Anti-Black racism

The policies and practices that are embedded in Canadian institutions that reflect and reinforce beliefs, attitudes, prejudice, stereotyping and/or discrimination that are directed at people of Black African descent and are rooted in their unique history and experience of enslavement and colonization here in Canada.

Anti-oppression

Strategies, theories, and actions that challenge social and historical inequalities/injustices that have become part of systems and institutions and allow certain groups to dominate over others.

Anti-racism

An active and consistent process of change to eliminate individual, institutional, and systemic racism.

Black person and identity

Any person with Black African origin or descent, and who self-identifies as such (e.g., African, African Canadian, Afro-Caribbean).

Microaggression

Commonplace daily, subtle messages, slights and insults against marginalized people that are verbal, unconscious, and take a psychological and physiological toll on the target person or group.

Section 5.1 Respect and Dignity

(a) Shelter providers will

(iii) Provide services to each client in a non-judgmental manner, free from discrimination, harassment, **racism, and oppression**

Shelter, Support and Housing Administration

DIRECTIVE

Directive No.: 2023-03

Date Issued: December 18, 2023

Section 6 Client Rights and Responsibilities

- (b) At a minimum, clients have the right to
 - (iii) an environment free from anti-Black racism (e.g., discrimination, prejudice, and harassment)
- (d) Clients will not
 - (iv) engage in racist and/or anti-Black racist behaviour, including using racist and/or anti-Black language (e.g., racial slurs)

Section 7 Complaints, Compliments and Appeals

- (a) Shelter providers will
 - (ii) Identify a staff who will act as complaint lead, as part of the complaint policy. **The complaint lead will have completed CABR and trauma-informed trainings and be in a supervisory role.** Clients will be made aware of who the complaint lead is and be reminded of this when filing a complaint
 - (iii) Offer alternative modes of submitting (a) complaint(s), as per AODA, to support clients in making a complaint, including for those involving ABR, other than through a written submission
- (c) Shelters providers will have a policy and procedures regarding complaints involving anti-Black racism (ABR). This will, at a minimum, include
 - (i) Ensuring awareness among clients that complaints involving ABR should be reported, and that the level and quality of service received by a client reporting a complaint involving ABR will in no way be impacted by reporting such a complaint
 - (ii) Providing a process that allows complaints involving ABR to be shared confidentially (e.g., complaints box)
 - (iii) Clear guidelines on how complaints involving ABR will be processed and how the client will be made aware of the status of their complaint throughout the review process, and no later than 2 weeks after the initial reporting of the complaint

Shelter, Support and Housing Administration

DIRECTIVE

Directive No.: 2023-03

Date Issued: December 18, 2023

- (iv) Supports for client(s) who experienced incident(s) involving ABR
- (v) A follow-up process for client(s) engaging in ABR-related behaviour that will support learning and understanding of the impact of ABR-related behaviour on the person(s) affected (e.g., review of ABR policies, follow-up meetings, etc.).

Section 8.3 Admission

(f) Shelter providers admitting clients to a bedded program will collect the following client information at minimum and record the response in the SMIS intake

- (i) Personal information, including name, date of birth, gender, pronouns, **and racial identity**

Section 8.4 Shelter Orientation

(a) Shelter providers will provide clients with orientation to the shelter upon admission or as soon as possible, and no later than twenty-four (24) hours after admission. At a minimum, shelter orientation information will include

- (xi) A list of resources specifically for Black clients (e.g., mental health providers specializing in supporting Black communities, Black-led community organizations, etc.)

Section 8.6.1 Planned discharges

(a) As part of a client's planned discharge and transition out of a shelter, shelter staff will

- (i) Provide information in writing and assistance to the client regarding resources relevant to the next stage of their service plan, including community services and key personal supports. **Every effort should be made to connect clients with specialized supports, in particular for 2SLGBTQ+, Indigenous, Black, senior and youth clients**

Section 8.6.2 Service restrictions

(d) Shelter providers may only issue service restrictions from a bedded program as a last resort to address

Shelter, Support and Housing Administration

DIRECTIVE

Directive No.: 2023-03

Date Issued: December 18, 2023

- (ii) Incidents involving ABR that threaten the well-being of clients and/or staff
- (e) All service restrictions from a bedded program must be approved by a shelter's Executive Director or designate prior to being issued.
 - (i) All service restrictions from a bedded program involving incidents of ABR and/or Black clients will be reviewed by the onsite CABR lead through an ABR lens, either at the time-of-service restriction or within 36 hours
- (g) Shelter providers will document the following information about service restrictions from a bedded program in SMIS in real time
 - (ii) the racial identity of the client issued the service restriction, if previously disclosed
- (j) Shelter providers will advise clients wishing to appeal a service restriction of the shelter's internal processes for handling such appeals. If the client has exhausted the shelter's internal processes and is not satisfied with the outcome, shelter providers will direct the client to contact SSHA in order to make their complaint, as described under section 7 Compliments, Complaints and Appeals.
 - (i) The CABR lead will ensure that any Black client who is issued a service restriction will be made aware of the appeal process, either at the time-of-service restriction or within 36 hours.

Section 9.1.2 Toiletries and Hygiene

- (e) Shelter providers will supply hygiene products specific to Black clients (e.g., shea butter, black African soap, black castor oil, shampoo, and hair care products for textured hair, etc.).
 - (i) Shelter providers will consult with Black clients to best determine which culturally appropriate hygiene products to provide.

Section 9.2. Food, Diet and Nutrition

- (a) In order to promote a healthy diet among clients, shelter providers will
 - (vi) Consult with a registered dietitian, **preferably one who is knowledgeable of ethnically diverse diets**, on an annual basis or more frequently as needed, for support in menu planning, training and other food services, and

Shelter, Support and Housing Administration

DIRECTIVE

Directive No.: 2023-03

Date Issued: December 18, 2023

other food security and nutrition-related supports

Section 9.2.1 Meal Program

- (e) Shelter providers will ensure that clients can provide input and feedback in a manner that complies with the requirements of section 6.1 Client Input, and to incorporate this feedback into menu planning whenever possible.
 - (i) Shelter providers will consult with Black clients to provide culturally appropriate meals, and additional condiments and spices
- (f) Shelter providers will provide clients access to food storage and preparation space such as a client-specific fridge and microwave, where possible.
- (g) Shelter providers will inform Black clients of culturally relevant nutrition programs and/or food preparation opportunities outside of the shelter (e.g., connect clients to community kitchens, etc.).

Section 9.2.2 Dietary Restrictions and Accommodation

- (j) Shelter providers that contract third-party food vendors (e.g., caterers), will aim to contract food vendors that offer culturally diverse meals, including those that reflect the cultural diversity of Black clients, and mark special cultural holidays and traditions with meals that correspond to those events.

Section 10.1 Case management

- (b) All shelter providers will offer some degree of case management and service planning to their clients.
 - (ii) Where possible, shelter providers will offer Black clients the opportunity to work with Black case managers.
- (d) An initial assessment of a client may include, but is not limited to identifying, documenting, or updating the following items
 - (iii) Specialized supports for 2SLGBTQ+, Indigenous, **Black**, senior and youth clients
- (r) Upon a client's planned discharge, shelter staff will

Shelter, Support and Housing Administration

DIRECTIVE

Directive No.: 2023-03

Date Issued: December 18, 2023

- (i) Provide information in writing and assistance to the client regarding resources relevant to the next stage of their service plan, including community services and key personal supports. **Every effort should be made to connect clients with specialized supports, particularly for 2SLGBTQ+, Indigenous, Black, senior and youth clients**

Section 10.2 Health and Mental Health Services

- (a) Shelter providers will support clients who seek to address their health and mental health care needs. At a minimum, shelter providers will
 - (iii) Ensure that Black clients are aware of Black-specific supports and services

Section 10.3.2 Children's Services and Program

- (e) Family shelter providers will offer a variety of developmentally appropriate activities for children within the shelter and/or ensure such opportunities are available within the surrounding community.
 - (i) Family shelter providers will offer developmentally appropriate activities for children that reflect the cultural diversity of the shelter (e.g., activities and resources, such as children's books, that reflect the experiences of Black, Indigenous, 2SLGBTQ+ children and families)

Section 10.3.3 2SLGBTQ+ clients

- (m) Shelter providers are encouraged to seek partnerships with 2SLGBTQ+-positive health/services providers, **including those that offer programming specific for 2SLGBTQ+ Black and racialized clients.**
- (o) Shelter providers offering 2SLGBTQ+ programming will aim to offer 2SLGBTQ+ groups and programs within shelters that help to foster a safe environment for 2SLGBTQ+ Black clients.

Section 10.3.6 Black Clients

- (a) Shelter providers will develop and implement ABR policies and procedures to address discrimination and bias toward Black clients within shelters, that, at a minimum, include clear consequences for any person(s) engaging in ABR behavior,

Shelter, Support and Housing Administration

DIRECTIVE

Directive No.: 2023-03

Date Issued: December 18, 2023

including clients, staff and/or volunteers.

- (i) All clients will be made aware of shelter policies around ABR, in addition to other measures addressing ABR at orientation and as needed throughout their stay in shelter.
- (b) Shelter providers will designate (a) staff to act as a CABR lead that supports the implementation of CABR policies, programs and supports.
- (c) Shelter providers will establish a safe and welcoming environment for Black clients in shelters, established through consultation with Black clients and staff (e.g., use of positive imagery and culturally appropriate décor).
 - (i) Shelter providers will ensure that Black clients have access to resources and opportunities to create Black-only safer spaces within shelters (e.g., Black shelter client groups and/or meetings, etc.).
- (d) Shelter providers will seek partnerships with organizations that offer services and/or programs that specifically support Black clients.
- (e) Shelter providers will ensure that Black clients have access to culturally competent health and mental health services and supports, as well as resources that address the effects of trauma on Black individuals and families.
- (f) Shelter providers will consult with Black-service organization(s) for on-site programming guidance for Black clients.
- (g) Shelter providers will support year-round Afrocentric programming to celebrate the identities of Black clients (e.g., Black History Month, information/awareness of prominent African leaders and inventors, Afro/Caribbean dance, culture, and arts etc.).
 - (i) Clients will be consulted in the program planning so that it is reflective of the Black community at each site (e.g., ethnicity, Black 2SLGBTQ+ clients).
- (h) Shelter providers will seek input from Black clients for the purpose of program development, planning and evaluation (e.g., exit interviews, discharge interviews, suggestion boxes, etc.), and provide updates on implementation and outcomes.

Shelter, Support and Housing Administration

DIRECTIVE

Directive No.: 2023-03

Date Issued: December 18, 2023

- (i) Shelter providers will arrange opportunities for all clients to learn and/or participate in CABR-related activities, including educational sessions and/or workshops.
- (j) Shelter providers will commit to continuous self-evaluation and service improvement specific to ABR practices and policies based on leading practices.
- (k) Shelter providers will ensure that there are multiple opportunities for staff to affirm their commitment to and support to confronting anti-Black racism (e.g., the creation of a Black staff peer support group).
- (l) Shelter providers will ensure staff have ongoing access to awareness raising activities around Black cultures and histories and Confronting Anti-Black Racism (e.g., promotion of Black community events, guest speakers, presentations, storytelling).
- (m) Shelter providers will seek out ABR training resources to supplement mandatory ABR trainings.
- (n) Shelter providers will ensure that there are Black staff only ABR trainings, workshops, and activities.

Section 12.4 Human Resources

- (b) Shelter providers will provide all new employees with an orientation or orientation information within the first five (5) days of their employment. At a minimum, the orientation information will cover key shelter policies, procedures and processes, including

- (ix) Anti-Black Racism policy and procedures

Section 12.4.2 Training and Professional Competencies

- (i) Shelter providers will seek training in the identified topics and professional competencies from agencies or trainers who are qualified to deliver training on the subject matter and can tailor the training content to a shelter-specific context, where possible.
 - (i) ABR trainings/sessions/workshops are to be led by a facilitator with lived experience as a Black person.

Shelter, Support and Housing Administration

DIRECTIVE

Directive No.: 2023-03

Date Issued: December 18, 2023

Training Topics and Professional Competencies Matrix

Equity, Diversity and Human Rights

Confronting Anti-Black racism training is mandatory for Board Members, to be completed within 6 months of start date of appointment

Working with Clients

Working with racialized children and youth added as mandatory for staff working in family and youth shelters, to be completed within 6 months of start date of employment

Implementation of CABR TSS standards

Directive 2023-02 “Confronting Anti-Black Racism standards added to the Toronto Shelter Standards” is effective immediately.

Providers are expected to begin adopting the CABR standards into programs and services right away and will have until the end of Q4 2024 to implement all the changes. Compliance assessments of these standards will be conducted by the Quality Assurance team in Q1 2025.

Information sessions will be offered to management and supervisory shelter staff, to help staff better understand the changes to the Toronto Shelter Standards, and to help answer any initial questions.

An implementation plan for this work is being developed. Resources will be developed with support from the sector and will be provided as they become available. This may include policy templates, reference guides and other materials.

Purpose of Directive

To ensure improved equity for Black clients and to help address systemic barriers related to anti-Black racism by providing guidance through new, and revised, shelter standards.

Background

At its meeting on December 5, 2017, [City Council adopted the Toronto Action Plan to Confront Anti-Black Racism](#) (The Action Plan). The Action Plan included 22 recommendations and 80 actions across five themes: Children & Youth Development, Health & Community Services, Job Opportunities & Income Supports, Policing & the Justice System, and Community Engagement & Black Leadership.

Shelter, Support and Housing Administration

DIRECTIVE

Directive No.: 2023-03

Date Issued: December 18, 2023

SSHA supports the [Toronto Action Plan to Confront Anti-Black Racism](#) through the following action items, under Recommendation 10, to improve shelter and housing conditions to better support Black Torontonians:

- 10.2 Apply an Anti-Black Racism Analysis to shelter standards and procedures
- 10.3 Ensure shelter staff are trained on anti-Black racism as a trigger to mental illness
- 10.4 Create safe spaces within new 2SLGBTQ+ shelters for Black queer and trans youth
- 10.5 Collect race-based data on homelessness, particularly on the needs of Black queer and trans youth for shelters support services planning
- 10.6 Create safe spaces within women's and family shelters for women of African descent

To support Action 10.2 of applying an ABR analysis to shelter standards and procedures, the City hired third-party facilitator, Facilitating Change, to conduct consultations in 2022 with Black shelter users. The goal was to better understand the perspective of Black individuals who access shelter settings and identify key issues and gaps in shelter delivery. Feedback was gathered through in-person focus groups, one-on-one interviews, and an online survey. Feedback from shelter staff was also collected through consultations and an online survey led by the City.

The results of the consultations were used to update the Toronto Shelter Standards, to ensure that the City is improving standards and addressing the needs of Black shelter residents.

[SSHA's Homelessness Solutions Service Plan](#) (The Service Plan) also identified addressing ABR across the Division and sector, as part of its focus on equity. The Service Plan highlights SSHA's commitment to working with internal and external partners to develop solutions that address the structural barriers faced by Black people experiencing homelessness and implement processes to ensure equitable access to housing and support opportunities. The Service Plan supports SSHA's goal of delivering homelessness services through an approach that recognizes and addresses the reality of ABR.

The City of Toronto is committed to adapting Toronto Shelter Standards to better serve racialized people and in confronting racism in all its forms. SSHA continues to seek ways to improve how we serve shelter residents and work to ensure that homelessness in Toronto is rare, brief and nonrecurring.

Shelter, Support and Housing Administration

DIRECTIVE

Directive No.: 2023-03

Date Issued: December 18, 2023

Resources

- [Toronto Shelter Standards](#)
- [SSHA's Homelessness Solutions Service Plan](#)
- [Toronto Action Plan to Confront Anti-Black Racism](#)
- [Poster: Anti-Black Racism](#)

Contact Information

For more information about and support in implementation of this Directive, please contact your Agency Review Officer.