



**Toronto Alliance to End Homelessness**  
**Submission to the Federal Housing Advocate Review of Encampments in Toronto**  
**June 2023**

1. Question 1: The Advocate wants to better understand the human rights issues facing people living in encampments. What would you like the Advocate to know about the experience of people living in encampments? If you have lived experience with encampments, please feel free to share your personal story.(required)

Homelessness is a violation of the human right to housing. Encampments embody this violation and any response taken must begin with a human rights approach. This is the foundation for progressive fulfilment of the right for all Torontonians, committed to by Toronto City Council in the updated Housing Charter and the Housing TO Action Plan.

The Toronto Alliance to End Homelessness (TAEH) recognizes other violation of rights that people living in encampments are facing in Toronto. Of particular concern are security and law-enforcement based approaches to monitoring and regulating people residing in encampments. Security approaches do not work in addressing homelessness, or in stopping people from setting up encampments. It traumatizes already vulnerable and marginalized people and increases their vulnerability to becoming chronically homeless, forcing people into often even more precarious places.

Key points of the human rights approach to homelessness and encampments include:

- Closing down or clearing encampments is considered a violation of the human rights of the people living in them. This includes removing or destroying personal property, even if the camp is deemed illegal or on public land.
- The encampments in and of themselves represent the right to housing claims, and other human rights claims, of the people living in them. Therefore, even though it is not a human right to camp, the response to encampments must prioritize addressing the violation of the human rights that they embody.
- In addition, principles and practices that ensure that a human rights approach is upheld must be practiced in all steps of the process in responding to encampments.
- There is an over-representation of Indigenous peoples, people of colour, women, LGBTQ2S in all communities of people experiencing homelessness. It is critical, therefore, that the response to encampments does not further traumatize people or exacerbate their homelessness.

- Evicting people is not the answer. People should not be punished for creating encampments as a way of coping with society's failure to uphold their right to housing.
2. Question 2: The Advocate also wants to hear from you about how to address the challenges for people living in encampments. What solutions would you like to see put in place? What changes would you like to see in the way governments (municipal, provincial or federal) treat people living in encampments?

We strongly urge increased investment by all orders of government into the ability to deliver comprehensive Housing First options to people who are living in encampments. This includes developing new affordable and deeply affordable housing options and increasing allocations of critical housing allowances – such as the recently depleted Canada-Ontario Housing Benefit (COHB) - and developing housing allowances and subsidies that are targeted directly for people who are experiencing homelessness. These increased fund allocations must be sufficiently deep enough to create immediate access to rental housing for people experiencing homelessness and coupled with strategies to make that housing available urgently.

We believe that there is another way to support people living in encampments that is affirming of the harm that is experienced through being unhoused and unsheltered, and that advocates for improving our collective responses across all interested parties: residents of encampments, advocates for improving their lives, and officials and outreach workers offering supports and services.

The Dufferin Grove model that was employed in Toronto must be expanded to all existing and emerging encampments. This model is a person-centred, housing outcome driven approach that includes delivering services directly to encampment residents to prepare them to move into permanent housing. Offering an on-site resource center, open every day, to coordinate access to all the different types of supports from mental health to tax and identification services that people need made a critical impact on the lives of encampment residents, and their ability to move forward in a housing journey.

**The City of Toronto must urgently build on the successes and learnings from the Dufferin Grove Park Model** in order to truly make it the “blueprint” for the City’s approach to encampments. This means allocating the financial resources needed to support the enhanced, housing-first and people-centered approach delivered in Dufferin Grove Park. This intensive approach has demonstrated successfully that people will move to alternate shelter or to permanent housing when this type of approach is undertaken. It must be expanded with urgency.

3. Questions 3: Is there anything else you would like to share with the Advocate to help her understand the issues or make recommendations?

Encampments are not a sustainable, healthy, or just solution to the housing and homelessness crisis – only housing is. Their prevalence is the result of policy and fund allocation decisions that are inconsistent and harmful and that do not make fiscal sense.

Over 25 years of successive housing funding cuts by federal and provincial governments, along with a rapidly increasing financialized housing market and consistent offloading of policy and programming responsibilities to the City has left Toronto attempting to face unprecedented rates of homelessness without enough resources to do so. We are in urgent need of a coordinated approach by all orders of government, and for a plan to end homelessness that is rooted in harm reduction and anti-oppression, and that is guided by the expertise of people with lived experience, community advocates, and housing and homelessness service delivery, programming, and policy experts.

Finally, it is critical to consider the linkage between homelessness and poverty. Long-term solutions to address homelessness must also consider strategies that ensure people have the income needed to meet their basic needs. There is not a single form of income assistance that provides people in Toronto with enough financial support to afford an apartment – minimum income assistance rates would need to be tripled to catch up to the cost of living in Toronto, and would need to be tied to either the rental market average, or the Market Basket Measures of a given community.