

**ONTARIO
SUPERIOR COURT OF JUSTICE**

B E T W E E N:

MICHAEL NANOS and JOSEPH MICALLEF

Plaintiffs/Moving Parties

and

THE CORPORATION OF CITY OF CAMBRIDGE

Defendant/Responding Party

MOTION RECORD – VOLUME II

**WATERLOO REGION COMMUNITY
LEGAL SERVICES**

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TAB 1

Court File No. CV-24- 00000526-0000

**ONTARIO
SUPERIOR COURT OF JUSTICE**

B E T W E E N:

MICHAEL NANOS and JOSEPH MICALLEF

Plaintiffs

and

THE CORPORATION OF THE CITY OF CAMBRIDGE

Defendant

AFFIDAVIT OF ERIN DEJ

I, **Erin Dej**, of the City of Cambridge, in the Province of Ontario, AFFIRM AS FOLLOWS:

1. I have personal knowledge with respect to the facts set out below, except where stated otherwise. Where the information is not based on my personal knowledge, it is based upon information provided by others which I believe to be credible and true.

CREDENTIALS AND NATURE OF WORK

2. A copy of my *Curriculum Vitae* is attached hereto as **Exhibit "A"**.
3. I am an Associate Professor at Wilfrid Laurier University in the Department of Criminology. I hold a doctorate in Criminology from the University of Ottawa and completed postdoctoral training at the Canadian Observatory on Homelessness at York University. My research examines the criminalization and social exclusion of people experiencing homelessness, including the publication of my 2020 book, *A Complex Exile: Homelessness and Social Exclusion in Canada*, published by UBC Press. In doing this

work, I have conducted research on unhoused people's perceptions of mental illness diagnoses and treatment, and young women and gender diverse people's experiences of loneliness and isolation when transitioning from homelessness to housing.

4. I have also done considerable work on homelessness prevention, working alongside Dr. Stephen Gaetz, President and CEO of the Canadian Observatory on Homelessness, to develop the *Framework for Homelessness Prevention*.¹ I also co-authored the national *State of Homelessness in Canada 2016*.² I am currently conducting research on the intersection of youth criminal justice involvement and youth homelessness, and have conducted research on the impact of COVID-19 on the homeless population. I am a co-investigator on several local, provincial, and national projects in these areas, including a provincial study on Ontario's affordable housing approach, a national research collaborative on developing social connection guidelines, and a local provincial-based project assessing municipal policy responses to encampments.
5. Over the past four years I have been conducting research for the project, *From NIMBY to Neighbour: Brokering a Dialogue about Homelessness Among People Experiencing Homelessness, Law Enforcement, and the Community* (hereby referred to as *From NIMBY to Neighbour*). This research builds on a research project I led in 2020 on a mid-size British Columbia community, a summary of the report is published and available as **Exhibit "B"**. *From NIMBY to Neighbour* is Ontario based and includes municipal partners, including the City of Cambridge, The County of Wellington, and the City of Brantford. Details of the project are available in **Exhibit "C"**. The purpose of the research

¹ Gaetz, S., & Dej, E. (2017). *A New Direction: A Framework for Homelessness Prevention*. Canadian Observatory on Homelessness Press.

² Gaetz, S., Dej, E., Richter, T., & Redman, M. (2016). *The State of Homelessness in Canada 2016*. Canadian Observatory on Homelessness Press.

is to understand perceptions and misperceptions of homelessness in mid-size cities and to support the partner communities to address the unique challenges they are experiencing around public understandings of homelessness.

6. While publications of research findings from *From NIMBY to Neighbour* are still underway, I have attached the preliminary finding publication “Understanding Homelessness: Perspectives from 3 Mid-Sized Cities in Ontario” that I led and co-authored and adopt as part of my opinion in this case, attached hereto as **Exhibit “D”**.
7. Finally, I recently published a research brief on community building in encampments, as provided in **Exhibit “E”** where I analyzed the available literature concerning people residing in encampments. I will use this brief and the research cited within to assist in part of my opinion in this case.
8. I have been asked by Waterloo Region Community Legal Services to provide an expert opinion on the impact of enforcing bylaws that have the effect of evicting and displacing residents of an encampment that is situated on City of Cambridge property.
9. It is my view that the eviction of the encampment in the City of Cambridge will cause serious and immediate harm to the encampment residents and that the unique context and conditions in the City of Cambridge exacerbates the risks that come with encampment displacement.

THE IMPACT OF ENCAMPMENT DISPLACEMENT

10. Encampments are defined as “any area wherein an individual or a group of people live in homelessness together, often in tents or other temporary structures.”³ Clearing, or

³ Farha, L., Schwan, K. (2020). A Human Rights Approach: A National Protocol for Homeless Encampments in Canada. The UN’s Special Rapporteur on the Right to Adequate Housing. <https://www.make-the-shift.org/wp-content/uploads/2020/04/A-National-Protocol-for-Homeless-Encampments-in-Canada.pdf>

evicting encampments can be a stressful and traumatic experience, even when residents are provided with Trespass Notices in advance. The Federal Housing Advocate’s final report on their review of homeless encampments, attached hereto as **Exhibit “F”**, found that “...the constant threat of displacement, and the lack of reliable access to food and water, increases stress, exacerbates mental health issues, and can lead to a rise in violent incidents”.⁴

11. Whereas many of the calls for encampment evictions are prefaced on the notion of increasing community safety,⁵ they can often have the opposite effect, creating traumatic and stressful situations that put encampment residents and the general public at risk.

12. The Federal Housing Advocate’s Interim and Final Reports identified several serious, negative, and immediate consequences of encampment evictions:

- a) Makes encampment residents more unsafe
- b) Exposes encampment residents to greater risk of harm and violence
- c) Destabilize people, removing them from their support system
- d) Lose the tools and equipment they need to survive, such as ID, tents, money, clothing, and items of significant sentimental value
- e) Leads to health crises
- f) Causes trauma, exacerbating pre-existing mental health challenges
- g) Increases residents’ vulnerability to becoming chronically homeless

⁴ The Office of the Federal Housing Advocate. (2024). *Upholding dignity and human rights: The Federal Housing Advocate’s review of homeless encampments—Final Report*. The Office of the Federal Housing Advocate. https://www.housingchrc.ca/sites/housing/files/2024-02/Final%20report%20-%20Federal%20Housing%20Advocate%27s%20review%20of%20encampments%20-%20EN_1.pdf at 14.

⁵ Braimoh, J., Dej, E., & Sanders, C. (2023). “Somebody’s street”: Eviction of homeless encampments as a reflection of interlocking colonial and class relations. *Journal of Law & Social Policy*, 36, 12–22; Robillard, A., & Howells, S. (2023). “100% they are destroying our beautiful town”: Toxic conversations about homelessness on public Facebook community groups. *European Journal on Criminal Policy and Research*, 29, 379–395.

h) Forces people into increasingly hidden and precarious spaces⁶

13. While not always safe, research consistently shows that encampment residents consider encampments beneficial to their safety, compared to emergency shelters or sleeping in public spaces alone.⁷ This is because encampment residents often look out for one another and provide security for each other.⁸

14. Because of the social safety built among many encampment residents, encampment evictions disrupt these relationships and informal safety protocols, thereby putting people at greater risk of violence and harm.⁹

15. In their analysis of encampment evictions across the country, a group of pan-Canadian researchers found that people experience serious and immediate threats following an eviction: “Encampment residents frequently lack access to adequate water, sanitation, heating and cooling, and safety measures, which severely threatens their mental and physical well-being. In the absence of basic services, many encampments have self-organized to meet their basic needs and fill gaps in services (e.g., by establishing centralized tents for harm reduction supplies, water, or food). Encampment evictions

⁶ The Office of the Federal Housing Advocate, *supra* note 4; The Office of the Federal Housing Advocate. (2023). *Upholding dignity and human rights: The Federal Housing Advocate’s review of homeless encampments – Interim report*. The Office of the Federal Housing Advocate. https://www.housingchrc.ca/sites/housing/files/2023-10/ofha_-_interim_report_on_encampments_-_en_-_october_2023.pdf

⁷ *Ibid.*

⁸ Boucher, L. M., Dodd, Z., Young, S., Shahid, Bayoumi, Firestone, M., & Kendall, C. E. (2022). “They have their security, we have our community”: Mutual support among people experiencing homelessness in encampments in Toronto during the COVID-19 pandemic. *Qualitative Research in Health*, 2. <https://doi.org/10.1016/j.ssmqr.2022.100163>; Sparks, T. (2016). Citizens without property: Informality and political agency in a Seattle, Washington homeless encampment. *Environment and Planning A: Economy and Space*, 49(1), 86–103.

⁹ Flynn, A., Hermer, J., Leblanc, C., MacDonald, S.-A., Schwan, K., & Van Wagner, E. (2022). *Overview of Encampments Across Canada—A Right to Housing Approach—Executive Summary*. The Office of the Federal Housing Advocate. https://www.homelesshub.ca/sites/default/files/attachments/executive_summary-Overview%20of%20Encampments%20Across%20Canada-EN.pdf

frequently undermine these efforts and result in the loss or destruction of these resources and self-established mutual aid systems”.¹⁰

16. It is widely reported that when encampments are evicted, service provision is severely disrupted and outreach workers are often unable to locate encampment residents to provide ongoing support related to accessing housing, health care, and other needs.¹¹ As Herring describes, “Other times, outreach workers could not locate their clients on the streets to distribute medicine or notify them they had been granted access to shelter, rehab, or even housing because they had been relocated during a sweep”.¹² Other research by Herring and colleagues shows that in their case study, 91% of people who were displaced by an encampment eviction remained living outside, and so the eviction in no way ameliorated their living situation, and in fact made it more chaotic, stressful, and unsafe.¹³

THE CRIMINALIZATION OF HOMELESSNESS

17. The criminalization of homelessness refers to “...making illegal the more mundane activities or behaviors associated with homelessness and poverty, regardless of whether those behaviors would typically be considered crimes”.¹⁴ It describes three factors:

- a) Creating laws that target people who are homeless¹⁵

¹⁰ *Ibid* at 16.

¹¹ Chan McNally, D. (2022). Responsibility downloaded: How drop-in centres stepped up and pushed back during the pandemic. In G. Cook & C. Crowe (Eds.), *Displacement City: Fighting for Health and Homes in a Pandemic* (pp. 79–97). Aevo University of Toronto Press.

¹² Herring, C. (2019). Complaint-Oriented Policing: Regulating Homelessness in Public Space. *American Sociological Review*, 84(5), 769–800 at 791.

¹³ Herring, C., Yarbrough, D., & Marie Alatorre, L. (2020). Pervasive Penalty: How the Criminalization of Poverty Perpetuates Homelessness. *Social Problems*, 67(1), 131–149.

- b) Disproportionate enforcement of laws on people who are homeless, for which housed people are rarely cited (i.e. public intoxication)¹⁶
- c) Cycling, or a 'revolving door' between criminal justice system and homelessness, most often due to minor infractions connected with "activities of living" (i.e. sleeping, sitting, urinating, etc.)¹⁷

18. When encampments are evicted, unhoused people are more likely to be visible in public spaces, which makes them vulnerable to criminalization. Criminalization often takes place to hide homelessness from consumer areas, such as the downtown core to prioritize small businesses and tourism.¹⁸

19. While criminalization may sometimes consist of citation or arrest, it often consists of 'pervasive penalty', processes that fall short of arrest, but include move-along orders, citations, and threats. The continuous nature of these strategies is described as demeaning. "The cumulative impact of such dehumanizing requests can become a totalizing experience of exile".¹⁹ Unhoused people describe experiences of criminalization and negative interactions with police as embarrassing, demeaning, and detrimental to their feelings of self-worth. It can create a sense of hopelessness that further entrenches people in homelessness.²⁰

¹⁸ Doherty, J., Busch-Geertsema, V., Karpuskiene, V., Korhonen, J., O'Sullivan, E., Sahlin, I., Tosi, A., Petrillo, A., & Wygnańska, J. (2008). Homelessness and exclusion: Regulating public space in European cities. *Surveillance & Society*, 5(3), 290–314; Kennelly, J. (2013). 'You're making our city look bad': Olympic security, neoliberal urbanization, and homeless youth. *Ethnography*, 16(1), 3–24; Margier, A. (2023). The involvement of business elites in the management of homelessness: Towards a privatization of service provision for homeless people? *Urban Affairs Review*, 59(3), 668–691; Sylvestre, M.-E. (2010). Disorder and public spaces in Montreal: Repression (and resistance) through law, politics, and police discretion. *Urban Geography*, 31(6), 803–824.

¹⁹ Herring et al., *supra* note 12 at 140.

²⁰ MacDonald, S.-A., & Roebuck, B. (2008). *Staying Alive while Living the Life: Adversity, Strength, and Resilience in the Lives of Homeless Youth*. Fernwood Publishing; Quirouette, M. (2016). Managing Multiple Disadvantages: The Regulation of Complex Needs in Emergency Shelters for the Homeless. *Journal of Poverty*, 20(3), 316–339.

20. While arrest and incarceration are rare for infractions related to the criminalization of homelessness, they are not unheard of, with O’Grady and colleagues analysis of Ontario Ministry of Safety and Corrections data showing people who were incarcerated for panhandling.²¹ More often than being incarcerated directly for a citation, people who are homeless struggle to keep multiple and sometimes conflicting bail or probation conditions, resulting in an extensive criminal record and a custody sentence even if the original charge is withdrawn.²² There is a real threat of criminalization and incarceration when unhoused people occupy increasingly visible spaces.

THE CONTEXT IN CAMBRIDGE, ONTARIO

21. Cities across the country are experiencing an influx of homelessness, with homelessness increasing by 20% between 2018 and 2022 and unsheltered homelessness (primarily people living outside) increased 88% in that same time period.²³

22. As one of the mid-size cities studied for the *From NIMBY to Neighbour* project, Cambridge experiences unique challenges with the growth in homelessness and especially visible homelessness, which is a relatively recent phenomenon for the community. Analysis of interview data from Cambridge reveals two findings that are especially pertinent to this case:

²¹ O’Grady, B., Gaetz, S., & Buccieri, K. (2013). Tickets ... and More Tickets: A Case Study of the Enforcement of the Ontario Safe Streets Act. *Canadian Public Policy*, 39(4), 541–558.

²² Myers, N. M. (2017). Eroding the Presumption of Innocence: Pre-trial Detention and the Use of Conditional Release on Bail. *The British Journal of Criminology*, 57(3), 664–683.

Sylvestre, M. E., Blomley, N., & Bellot, C. (2019). *Red Zones: Criminal Law and the Territorial Governance of Marginalized People*. Cambridge University Press.

²³ Infrastructure Canada. (2024). *Everyone Counts 2020-2022: Results from the Third Nationally Coordinated Point-in-Time Counts of Homelessness in Canada*. Infrastructure Canada. <https://www.infrastructure.gc.ca/alt-format/pdf/homelessness-sans-abri/reports-rapports/pit-counts-dp-2020-2022-results-resultats-en.pdf>

- a) Responses to encampments are primarily complaint-driven, with a small number of complainants frequently reporting encampment locations.²⁴ One interview participant with first-hand knowledge of the situation in Cambridge described regular complainants as “hunting” and “actively looking for [encampment] sites”.
- b) The negative discussions occurring about homelessness in Cambridge in online social media groups is prolific and contributes to hostility towards people who are homeless. Interview participants from Cambridge described the online groups as “extreme,” “inaccurate,” and “exaggerated.” Consistent across stakeholders in Cambridge was a sense that online social media groups are a threat to people who are homeless and contributes to the cycle of complaints noted above, and thus the criminalization of homelessness in Cambridge.

23. Cambridge has been characterized as a ‘service desert,’ describing the lack of quantity and range of services available for the level of need in Cambridge. Recent data from YWCA Cambridge revealed that Cambridge holds just 15% of the Region of Waterloo’s adult shelter beds and has 0 of the Region’s 38 transitional beds for people who are homeless.²⁵

24. Cambridge does not have enough housing to meet the needs of low-income earners. Over the last three years, Cambridge created very little rental stock, 0.5% of what

²⁴ A limitation of this research is that we do not have access to the raw data on complaints; rather our findings come from information shared with us from interview participants.

²⁵ Gordon, J., Gunn, R., Decker, K., & Taylor, K. (2023). *Women’s Homelessness in Cambridge: Knowledge Sharing and Interventions*. YWCA Cambridge. Please note that while the report focuses on women’s homelessness in Cambridge, the data presented above refers to the homelessness system overall and is not specific to women and gender-diverse people.

Kitchener and Waterloo created. At the same time, Cambridge has a higher percentage of households living in subsidized housing, compared with Kitchener and Waterloo.²⁶

25. As an example of Cambridge's position as a service desert, the City only has one emergency shelter, The Bridges, run by Cambridge Shelter Corporation. The shelter consists of 56 emergency beds and 20 supportive housing units with extra mats available for overflow if necessary.²⁷ As the only shelter, it is impossible for The Bridges to meet the needs of everyone experiencing homelessness in Cambridge. For example, because The Bridges does not have a safe consumption and treatment site on site, people who are actively using illicit substances will find it difficult to stay there. Likewise, the Bridges spatial make up means that people are sleeping in a congregate setting (most beds are in a single large room), which can be stressful for some people and cause sleep deprivation, resulting in worsening physical and mental health. In fact, research shows that privacy and a sense of security are among the two primary reasons why people stay in encampments.²⁸

26. The result of a service desert and lack of service options means that the resources that are available will not work for everyone. As Cohen and colleagues describe, "In other communities, shelter beds are available but go unused because of regulations or conditions that are incompatible with potential clients' expectations or needs."²⁹

²⁶ Ayer, S. (2024). *Vital Signs 2023: Affordable Housing in Waterloo Region (Cambridge Edition)*. Waterloo Region Community Foundation.

²⁷ <https://cambridgesheltercorp.ca/>

²⁸ *Supra* note 4; Olson, N., & Pauly, B. (2023). 'Forced to Become a Community': Encampment Residents' Perspectives on Systemic Failures, Precarity, and Constrained Choice. *International Journal on Homelessness*, 32(2), 124–138.

²⁹ Cohen, R., Yetvin, W., & Khadduri, J. (2019). *Understanding encampments of people experiencing homelessness and community responses: Emerging evidence as of late 2018*. U.S. Department of Housing and Urban Development. <https://www.huduser.gov/portal/sites/default/files/pdf/Understanding-Encampments.pdf> at 4.


27. When there are a lack of resources and available services to direct people towards, reactive law enforcement steps in to address homelessness.³⁰ Findings from *From NIMBY to Neighbour* reveal that first responders feel frustrated with the lack of viable solutions to offer unhoused people that instead sees a cycle of displacement instead. As one law enforcement agent from Cambridge described, “Unfortunately, it’s just a cycle. It’s just a ‘I’ll move you from here. I’ll see you next week here. Move you from there. See you next week, the next spot.’ There’s really no long-term solution.”
28. The City of Cambridge has focused and resourced law enforcement measures to respond to homelessness. In February 2024, Cambridge City Council approved a motion to hire five security guards to patrol downtown Galt 24/7, specifically to address problems caused by a small segment of the City’s unhoused population.³¹
29. As such, while many people experiencing homelessness are at risk of criminalization, the situation in the City of Cambridge leaves unhoused people at heightened risk if they are visible in public, while at the same time there are fewer resources available than other cities for them to mitigate this risk. Therefore, the eviction of an encampment, especially one that does not disrupt commercial or tourist activity, poses an immediate and serious risk to encampment residents.

³⁰ Martino, N., Sanders, C. B., & Dej, E. (2023). The ‘regulatory grey zone’: Bylaw enforcement’s governing of homelessness and space. *Policing and Society*, 1–16. <https://doi.org/10.1080/10439463.2023.2263617>

³¹ Desmond, P. (10 February 2024). Cambridge council approves security team to ‘uphold the values’ of citizens. *The Record*, https://www.therecord.com/news/waterloo-region/cambridge-council-approves-security-team-to-uphold-the-values-of-citizens/article_bcbbffc2-7fb8-5731-b4f7-bd2b0d83c504.html

30. I make this Affidavit in support of the Notice of Motion, and for no improper purpose.

AFFIRMED BEFORE ME by videoconference)
 From the City of Cambridge, in the Province)
 of Ontario)
 Location of the Deponent)
 To the City of Kitchener, in the Regional Municipality)
 of Waterloo (Location of Commissioner))
 In accordance with O Reg 431/20.)
 This 26th day of March 2024)



 A Commissioner, etc.



 Dr. Erin Dej

ASHLEY ELIZABETH SCHUITEMA
 A Commissioner, etc.,
 Province of Ontario,
 While a Barrister and Solicitor.
 LSO # 68257G

THIS IS **EXHIBIT "A"** REFERRED TO
IN THE AFFIDAVIT OF ERIN DEJ
AFFIRMED THIS 26TH DAY OF MARCH, 2024



ASHLEY ELIZABETH SCHUITEMA
A Commissioner, etc.,
Province of Ontario,
While a Barrister and Solicitor.
LSO # 68257G

ERIN DEJ

121 Grand River Hall, Brantford Ontario | edej@wlu.ca

EDUCATION

PhD	University of Ottawa, Philosophy, Criminology <i>Seeking Inclusion in the Land of Broken Toys: Negotiating Mental Health Managerialism among Homeless Men and Women</i>	2016
MA	Carleton University, Legal Studies Distinction <i>What Once Was Sick is Now Bad: The Shift from Pathologized Victim to Deviant Identity for Those Diagnosed with Fetal Alcohol Spectrum Disorder</i>	2008
BA	Carleton University, Criminology and Criminal Justice Graduated with High Honours Concentration in Law, Minor in English	2006

ACADEMIC APPOINTMENTS

Wilfrid Laurier University Associate Professor Department of Criminology	2023-Present
Wilfrid Laurier University Assistant Professor Department of Criminology	2018-2023
Canadian Observatory on Homelessness, York University SSHRC Postdoctoral Fellow	2016-2018

AWARDS AND DISTINCTIONS

Co-Investigator, SSHRC Partnership Engage Grant – Dr. Kaitlin Schwan, PI \$22,599 Advancing Shelter and Supports for Homeless Muslim Women & Children in Canada	2023
Co-Investigator, SSHRC Insight Development Grant – Dr. Laura Pin, PI \$63,737 Realizing the right to housing: Municipal policy responses to encampments in Canada	2023
Laurier Brantford Grants Program	2023

\$4,600

Making our claim: Violations to the right to housing for marginalized women and gender-diverse people

Principal Investigator, Category C: Knowledge Mobilization grant, Wilfrid Laurier University **2023**

\$2,000

From NIMBY to Neighbour – Brokering a Dialogue on Homelessness in Mid-Size Cities

Principal Investigator, Making the Shift: Youth Homelessness Social Innovation Lab **2022-2024**

\$99,341
Pursuing justice: Bilateral interactions among the criminal justice and housing sectors for preventing youth homelessness

Co-Investigator, CIHR Project Grant – Dr. Kiffer Card PI **2022-2027**

\$995,000
Developing social connection guidelines to help Canadians build happier, healthier, and more inclusive communities in the late pandemic period

Co-Investigator, SSHRC Connection Grant – Dr. Jason Webb PI (Post-doctoral fellow) **2022-2023**

\$25,000
Fostering inclusive community responses to homelessness in midsize cities

Co-Investigator, SSHRC Synthesis Grant – Dr. Marcus Sibley PI (Post-doctoral fellow) **2022**

\$29,994
Approaches to social inclusion, community resilience, and homelessness in the context of emerging asocial societies

Co-Investigator, Government of Canada, Reaching Home – Dr. Stephen Gaetz, PI **2022-2024**

\$425,888
Building local capacity to reduce homelessness through shelter diversion & evictions prevention

Wilfrid Laurier University Early Career Researcher Award **2021**

\$2,500

Co-Investigator, SSHRC Partnership Development Grant – Dr. Abe Oudshoorn, PI **2021-2024**

\$199,114
Designing Canada’s long-term affordable housing approach

Co-Investigator, University of Toronto - Toronto COVID-19 Action Initiative – Dr. Joseph Hermer, PI **2020-2021**

\$82,219
Pandemic policing of the homeless in Canada: From crime control to public health strategy

Principal Investigator, Making the Shift: Youth Homelessness Social Innovation Lab **2020-2021**

\$39,999

Understanding young women's experiences of loneliness and isolation during COVID-19 and Beyond: Participatory research to envision a way forward	
Co-Investigator, NSERC College and Community Innovation Program – Dr. Benjamin Roebuck, PI \$75,000 COVID-19 and system responses to homelessness	2020-2021
Principal Investigator , SSHRC Partnership Development Grant \$199,150 From NIMBY to neighbour: Brokering a dialogue about homelessness among people experiencing homelessness, law enforcement, and the community	2020-2023
Principal Investigator , SSHRC Insight Development Grant \$69,835 Home alone: Young women's experiences of social exclusion for those exiting homelessness	2019-2022
Principal Investigator , Brantford Community and Well-being Grant \$2,462.40 Brokering a counter narrative on homelessness	2019-2021
Principal Investigator , Category A: Research Grant, Wilfrid Laurier University \$14,957.50 Brokering a counter narrative on homelessness	2019-2020
Principal Investigator , Crime Reduction Research Program, BC Ministry of Public Safety and Solicitor General \$100,000 Brokering a counter narrative on homelessness	2019-2021
Co-investigator, SSHRC Partnership Engage Grant – Dr. Lauren Eisler PI \$25,000 Accessing Legal Services in Rural Communities: Exploring the Barriers in Haldimand & Norfolk	2019-2021
SSHRC Postdoctoral Fellowship \$80,000 Owning my story: Taking control of how not-for-profits use the images and stories of individuals experiencing homelessness	2016-2018
SSHRC Canada Graduate Scholarship, Doctoral Award \$105,000 Seeking inclusion in the 'land of broken toys': Negotiating mental health managerialism among homeless men and women	2009-2012
Richard V. Ericson Graduate Paper Award, Canadian Society of Criminology	2009
Ontario Graduate Scholarship	2008

\$15,000

University of Ottawa Excellence Scholarship **2008-2014**
\$35,000

SSHRC Canada Graduate Scholarship, Master's Award **2007-2008**
\$17,500

Carleton University Department of Law and Legal Studies Scholarship **2006-2007**
\$25,000

Carleton University Senate Medal for Outstanding Academic Achievement **2006**

Carleton University Dean's List **2002-2006**

RESEARCH EXPERIENCE

Canadian Observatory on Homelessness, York University **2016-2018**
Research Associate
Supervision: Dr. Stephen Gaetz

Canadian Observatory on Homelessness, York University **2017-2018**
Project Lead – Making Zero Count: Defining an End to Homelessness

University of Ottawa **2009-2016**
Research Assistant
Supervision: Dr. Jennifer Kilty

Research Assistant **2010**
Supervision: Dr. Sylvie Frigon and Dr. Jennifer Kilty

Carleton University **2006-2008**
Research Assistant
Dec. 2006–Aug. 2008
Supervision: Dr. Dawn Moore

The Law Commission of Canada **2004-2006**
Research Associate
Supervision: Dr. Steven Bittle

TEACHING EXPERIENCE

Wilfrid Laurier University

Associate Professor, Department of Criminology **2023-**
Assistant Professor, Department of Criminology **2018 -2023**

CC601: Qualitative Fieldwork in Deviance	Fall 2022, 2023
CC430: Homelessness and Criminal Justice in Canada	Fall 2020, Fall/Winter 2021-22, Winter 2023, 2024
CC390: Theories of Crime II	Fall 2020
CC290: Theories of Crime I	Fall 2018, Winter 2019
CC411: Criminalizing Marginality	Winter 2019
CC426: Qualitative Methodologies in Criminology	Fall 2018, Winter 2020, 2021, 2022

Carleton University

Part-Time Professor, Institute of Criminology and Criminal Justice **2015-2016**
 CRCJ 1000: Introduction to Criminology Fall 2015, Winter 2016, Summer 2016

Part-Time Professor, Department of Law

2011-2016
 LAWS 3308: Punishment and the Law Fall 2011, Winter 2013, Fall 2013, Winter 2016
 LAWS 4306: Criminal Law Issues – Mental Health and Criminal Justice Winter 2016

University of Ottawa

Part-Time Professor, Department of Criminology **2011**

CRM 2309: Criminal Justice and Health Winter 2011

University of Ottawa

Teaching Assistant **2008-2014**

CRM 2309: Criminal Justice and Health 2014
 SSS 2110: Social Science of Health 2010, 2012
 CRM 1300: Introduction to Criminology 2008-2009

Carleton University

Teaching Assistant **2006-2008**

LAWS 1000: Introduction to Legal Studies 2006-2008

SUPERVISION & MENTORSHIP

In Progress – Doctoral Thesis Committee Member

Sophie Lachapelle. Make Yourself at Home: An Institutional Ethnography of Municipal Poverty and Homelessness Management in Kingston, Ontario, Canada. Department of Criminology, University of Ottawa.

Bridget Annor. Exploring the experiences, health, and resilience of homeless adolescent girls and young women in urban Ghana. Arthur Labatt Family School of Nursing, Western University.

David Grand. Investigating grief and loss narratives of individuals with lived experiences of homelessness. Faculty of Social Work, Wilfrid Laurier University.

Completed – Doctoral Thesis Committee Member

2021. Joanna Binch. How does living in a rooming house impact health? School of Nursing, University of Ottawa.

In Progress – Master’s Thesis Supervisor

Claire Rahija. Housing and homelessness need among urban Indigenous People in Brantford, Ontario. Department of Criminology, Wilfrid Laurier University.

Kaitlin Humer. Access to justice for people experiencing homelessness during the COVID-19 pandemic. Department of Criminology, Wilfrid Laurier University.

Trinity Fletcher. Rootlessness as rooflessness: An analysis of Indigenous-specific homelessness policies in Canada. Department of Criminology, Wilfrid Laurier University.

Completed – Master’s Thesis Supervisor

2023. Supervisor. Kaitlin Waechter. Women’s experiences within ‘safe spaces’. Department of Criminology, Wilfrid Laurier University.

2022. Co-Supervisor. Natasha Martino. Loose Coupling, Burden Shuffling, and Pervasive Penalty: The Role of Bylaw Enforcement in Managing Homelessness. Department of Criminology, Wilfrid Laurier University.

Directed Studies Supervisor

2024. Trinity Fletcher. CC650 – Policy analysis on Indigenous Homelessness in Canada. Department of Criminology, Wilfrid Laurier University.

2024. Tye Anthony. CC650 - Creating an Indigenous definition of home. Department of Criminology, Wilfrid Laurier University.

2023. Taylor Bishop. CC410 - The Impact of Loneliness and Exclusion on Women Transitioning from Homelessness to Housing. Department of Criminology, Wilfrid Laurier University.

In Progress – Master’s Thesis Committee Member

Valentina Ornelas. Media coverage of homelessness. Department of Political Sciences, Wilfrid Laurier University.

Krystene Green. Criminalizing Indigenous land defenders. Department of Criminology, Wilfrid Laurier University.

Wilsy Choudhary. Combined HF4Y and IMHA service models to improve quality of life for youth who have experienced homelessness. Community Psychology, Wilfrid Laurier University.

Shauna Perez. What is the experience of moral distress for service providers working with persons experiencing homelessness in relation to service restrictions. Faculty of Health and Rehabilitation Sciences, Western University.

Ghazaleh Salahi. The role of structural and institutional factors in shaping women's experiences of transitioning from homeless to housed in middle to high-income countries. Faculty of Health and Rehabilitation Sciences, Western University.

Completed – Master's Thesis Committee Member

2022. Amira Springer. Living in colour: Racialized housing discrimination in Canada. Master's Program in Globalization, McMaster University – Major Research Paper.

2022. Victoria Rozycki. Harm reduction in the context of Housing First for Youth. Community Psychology, Wilfrid Laurier University.

UNIVERSITY & DEPARTMENTAL INVOLVEMENT

Department of Criminology Ethics Committee, Chair	2023-2024
Women's Faculty Colleague	2022-2024
Graduate Chair Alternate	2022-2023
Part-Time Appointment Committee	2020-2025
Department of Criminology Ethics Committee	2020-2021
Doctoral Dissertation Chairperson Roster	2020-2022
Graduate Admissions and Scholarship Committee	2020-2022
Department Appointments and Promotions Committee	2019-2020, 2023-2024

RESEARCH & COMMUNITY INVOLVEMENT

Unsheltered Campaign Member	2022-
Blue Door Member, Circle of Champions	2022-
John Howard Society of Ontario Advisory Group Member	2022-2023
City of Brantford Point-in-Time Count Planning Committee Member	2019-2023
Women's National Housing and Homelessness Network Member	2019-
The Bridges Shelter Member, Board of Directors	2019-

National Youth Justice Network Member	2019-
Canadian Observatory on Homelessness Council Member	2019-
Centre for Research on Security Practices Member	2019-
Making the Shift Housing First for Youth Research Advisory Member	2018-
Advisory Council on Adult Correctional Initiative Member	2018-2019
The Alliance to End Homelessness Ottawa Research Committee Communications Committee	2016-2018 2013-2016
The Ottawa Mission Member, Board of Directors Volunteer	2017-2018 2010-2018
The Ask Me Campaign Chair	2011-2017
Shepherds of Good Hope Volunteer	2010-2012
Place to Go Volunteer	2010-2011
Ottawa Rape Crisis Centre Secretary, Board of Directors	2009-2011
Criminology Graduate Student Association PhD Committee Representative Secretary	2009 2008
St. Leonard's Society of Canada Research Associate	2007-2009

PUBLICATIONS

Books

Dej, E. (2020). *A Complex Exile: Social Exclusion and Homelessness in Canada*. Vancouver: UBC Press.

Kilty, J., & Dej, E. (Eds.). (2018). *Containing Madness: Gender and 'Psy' in Institutional Contexts*. Palgrave Macmillan.

Book Chapters

Kilty, J., & Dej, E. (2018). Introduction: Psy, gender, and containment. In Jennifer Kilty and Erin Dej (Eds.) *Containing Madness: Gender and 'Psy' in Institutional Contexts* (pp. 1-12). Palgrave Macmillan.

Dej, E. (2018). When a man's home isn't a castle: Hegemonic masculinity among men experiencing homelessness and mental illness. In Jennifer Kilty and Erin Dej (Eds.) *Containing Madness: Gender and 'Psy' in Institutional Contexts* (pp. 215-239). Palgrave Macmillan.

Dej, E., & Kilty, J. (2018). Conclusion: Expanding the concept of 'containment'. In Jennifer Kilty and Erin Dej (Eds.) *Containing Madness: Gender and 'Psy' in Institutional Contexts* (267-280). Palgrave Macmillan.

Dej, E. (2016). How do we make think about mental illness? In George Pavlich and Myra Hird (Eds.) *Questioning Sociology: Canadian Perspectives, 3rd Edition*, pp. 38-47. Don Mills: Oxford University Press.

Dej, E. (2012). What does mental illness mean? In George Pavlich and Myra Hird (Eds.) *Questioning Sociology: Canadian Perspectives, 2nd Edition*, pp. 79-89. Don Mills: Oxford University Press.

Peer Reviewed Journals

Dej, E., Braimoh, J., Sanders, C. (under review) 'They're not from here: Homelessness as a contestation of community identity for mid-size cities. *International Journal on Homelessness*.

Binch, J., Backman, C., Dej, E. Leonard, L., Phillips, J.C. (Under review). Rooming houses vs sheltered homeless in Ottawa, Canada: A secondary data analysis of select health indicators. *Cities*.

Binch, J., Phillips, J.C., Backman, C., Dej, E., Leonard, L. (Under review). Personas facilitate integration of vulnerable people's voice in photo-elicitation research. *Qualitative Inquiry*.

Crocker, D., & Dej, E. (In press). 'How can I fight for my babies if I don't have somewhere to live': Gendered experiences of housing insecurity. *Housing Studies*.

Dej, E. (In Press). A response to Jindra, Jindra, & DeGenero's Contrasts in Religion, Community, and Structure at Three Homeless Shelters: Changing Lives. *International Journal on Homelessness, 2(2)*, 1-7. DOI:10.5206/ijoh.2022.2.14835

Dej, E., & Kilty, J.M. (2024). 'Die alone, old, and let the cat eat your face': Antifeminist backlash and academic cyberharassment'. *Feminist Media Studies, 24(1)*: 70-86. DOI: 10.1080/14680777.2023.2181140

Dej, E., Ecker, J., & Martino, N. (2023). Barriers to accessing social housing programs in Canada. *Housing Studies*. 10.1080/02673037.2023.2266396

Martino, N., Sanders, C., & Dej, E. (2023). The 'regulatory grey zone': Bylaw enforcement's governing of homelessness and space. *Policing and Society*. 10.1080/10439463.2023.2263617

Chapados, S., Roebuck, B.S., Macdonald, S-A., Dej, E., Hust, C., McGlinchey, D. (2023). Homelessness, COVID-19, and discourses of contagion. *Qualitative Research in Health*. <https://doi.org/10.1016/j.ssmqr.2023.100276>

Braimoh, J., Dej, E., & Sanders, C. (2023). 'Somebody's street': Eviction of homeless encampments as a reflection of interlocking colonial and class relations. *Journal of Law & Social Policy*, 36, 12-22.

Roebuck, B. Chapados, S., Dej, E., Hust, C., Macdonald, S-A., McGlinchey, D., Groke, D., Luzzi, K., & Wark, J. (2023). A turning point? Responses to COVID-19 within the Homelessness Industrial Complex. *International Journal on Homelessness*, 3(1), 83-101.

Binch, J., Backman, C., Dej, E., Leonard, L., Phillips, J.C. (2022). Photo elicitation to explore health and social exclusion with rooming house residents in Ottawa, Canada. *Health & Place*, 77. <https://doi.org/10.1016/j.healthplace.2022.102866>

Schwan, K., Dej, E., & Versteegh, A. (2020). Girls, homelessness, and COVID-19: The urgent need for research and action. *Girlhood Studies* 13(3): 151-168.

Dej, E., Gaetz, S., & Schwan, K. (2020). Turning off the tap: A framework for homelessness prevention. *Journal of Primary Prevention*. 41(5): 397-412.

Oudshoorn, A., Dej, E., Parsons, C., Gaetz, S., & Befus, D. (2020). Evolving an evidence-based model for homelessness prevention. *Health & Social Care in the Community* 28(5): 1754-1763.

Dej, E. (2016). Psychocentrism and homelessness: The pathologization/responsibilization paradox. *Studies in Social Justice* 10(1): 117-135.

Dej, E. (2015). Sanctionner les (non-) coupables. Préciser la disposition de non-responsabilité criminelle. *Criminologie* 48(1): 37-58.

Kilty, J., & Dej, E. (2012). Anchoring amongst the waves: Discursive constructions of motherhood and addiction. *Qualitative Sociology Review* 8(3): 6-23.

Dej, E., & Kilty, J. (2012) Criminalization creep: A brief discussion of HIV/AIDS non-disclosure in Canada. *Canadian Journal of Law and Society* 27(1): 55-66.

Dej, E. (2011). What once was sick is now bad: The shift from victim to deviant identity for those diagnosed with Fetal Alcohol Spectrum Disorder. *Canadian Journal of Sociology* 36(2), 137-160.

Donohue (Dej), E. & Moore, D. (2009). When is an offender not an offender? Power, the client and shifting penal subjectivities. *Punishment and Society*, 11(3), 319-336.

Technical Reports

Dej, E., Smith, C., Petersen, H., Bute, C., Schwan, K., & Malenfant, J. (2023). *The Loneliness Project: Responding to young women & gender-diverse youth transitioning to housing*. Making the Shift Youth Homelessness Social Innovation Lab. Online at: <https://www.homelesshub.ca/sites/default/files/attachments/The%20Loneliness%20Project%20-%20Final%20Report%20-%20September%202023.pdf>

Dej, E., Sanders, C., Sibley, M., Webb, J., Broll, R. (2023). *Understanding Homelessness: Perspectives from 3 Mid-Sized Cities in Ontario*. Online at: <https://www.homelesshub.ca/resource/understanding-homelessness-perspectives-3-mid-sized-cities-ontario>

Sibley, M., Thompson, D., Martino, N., Sanders, C., Dej, E., Henderson, S. (2022). *Approaches to social inclusion, community resilience, and homelessness in the context of emerging asocial societies*. Final Report. SSHRC Knowledge Synthesis Grant.

Sibley, M., Webb, J., Dej, E., Sanders, C., & Broll, R. (2022). *From NIMBY to Neighbour: Brokering a dialogue about homelessness among people experiencing homelessness, law enforcement, and the community – Cambridge Preliminary Update*. Brantford: Centre for Research on Security Practices.

Webb, J., Sibley, M., Dej, E., Sanders, C., & Broll, R. (2022). *From NIMBY to Neighbour: Brokering a dialogue about homelessness among people experiencing homelessness, law enforcement, and the community – Brantford Preliminary Update*. Brantford: Centre for Research on Security Practices.

Webb, J., Sibley, M., Dej, E., Sanders, C., & Broll, R. (2022). *From NIMBY to Neighbour: Brokering a dialogue about homelessness among people experiencing homelessness, law enforcement, and the community – Guelph Preliminary Update*. Brantford: Centre for Research on Security Practices.

Eisler, L., Sanders, C., Dej, E., Cain, K., & Sinkowski, C. (2021). *Accessing Legal Services in Rural Communities: Exploring the Barriers in Haldimand & Norfolk*. Brantford: Brant, Haldimand, Norfolk Community Legal Clinic.

Dej, E., Sanders, C., & Braimoh, J. (2021). *Rewriting the Narrative on Homelessness in Mid-Sized Canadian Cities*. Brantford: Centre for Research on Security Practices.

Schwan, K., Versteegh, A., Perri, M., Caplan, R., Baig, K., Dej, E., Jenkinson, J., Brais, H., Eiboff, F., & Pahlevan Chaleshtari, T. (2020). *The State of Women's Housing Need & Homelessness in Canada: A Literature Review*. Hache, A., Nelson, A., Kratochvil, E., & Malenfant, J. (Eds). Toronto, ON: Canadian Observatory on Homelessness Press.

Gaetz, S., Schwan, K., Redman, M., French, D., & Dej, E. (2018). *The Roadmap for the Prevention of Youth Homelessness*. Toronto: Canadian Observatory on Homelessness Press.

Schwan, K., Gaetz, S., French, D., Redman, M., Thistle, J., & Dej, E. (2018). *What Would it Take? Youth Across Canada Speak Out on Youth Homelessness Prevention*. Toronto: Canadian Observatory on Homelessness Press.

Gaetz, S., Dej, E., Donaldson, J., & Ali, N. (2017). *Leading the Way: Reimagining Federal Leadership on Preventing Homelessness*. Toronto: Canadian Observatory on Homelessness Press.

Gaetz, S., & Dej, E. (2017). *A New Direction: A Framework for Homelessness Prevention*. Toronto: Canadian Observatory on Homelessness Press.

Gaetz, S., Dej, E., Richter, T., & Redman, M. (2016). *State of Homelessness in Canada 2016*. Toronto: Canadian Observatory on Homelessness Press.

Non-referred

Dej, E., Humer, K., & Card, K. (2024). Evidence brief – Is there community in encampments? *Canadian Alliance for Social Connection and Health*. Online at: https://static1.squarespace.com/static/60283c2e174c122f8ebe0f39/t/65e7831e2b22545bcd380be1/1709671199170/CSCG_Evidence+Brief_Encampments.pdf

Dej, E., & Paddick, W. (2023). Understanding homelessness in Canada: A call for compassion. *Municipal Law Enforcement Officers Association Summit*, pp. 18-20.

Schwan, K., Dej, E., & Pietsch, N. (2019). Beyond housing: Towards improved exits from homelessness for women-identifying youth. *Parity*, 32(8): 65-67.

Dej, E., & Ecker, J. (2018). Homelessness & precarious housing in Canada: Where we have been and where we are going. *Public Sector Digest*. Online at: <https://publicsectordigest.com/article/homelessness-precarious-housing-in-canada-where-we-have-been-where-we-are-going>

Moore, D., & Donohue (Dej), E. (2008). Harper and crime: The great distinction. In Teresa Healy, ed., *The Harper Record*. Ottawa: Canadian Centre for Policy Alternatives.

Book Review

Dej, E. (2019). Building a Collaborative Advantage: Network Governance and Homelessness Policy-Making in Canada, by C. Doberstein. *BC Studies*, 203: 165-166.

Other Contributions

Dej, E., Petersen, H., Smith, C., Bute, C., Schwan, K., & Malenfant, J. (17 October 2023). The loneliness project: Young women and gender-diverse youth's experiences of loneliness in transitions out of homelessness. *Homeless Hub: Research Matters*. Online at: <https://www.homelesshub.ca/blog/loneliness-project-young-women-and-gender-diverse-youth%E2%80%99s-experiences-loneliness-transitions>

Pin, L., Schuitema, A., Dej, E., Down, S. (27 July 2023). Encampments and Charter rights: Upholding the right to life, liberty and security of the person in the Waterloo Region Decision. *The National Right to Housing Network*. Online at: <https://housingrights.ca/encampments-and-charter-rights-waterloo-region-decision/>

Dej, E., Webb, J., & Braimoh, J. (25 October 2022). Staying put: Reimagining our response to preventing homelessness in mid-size cities. *Homeless Hub: Research Matters*. Online at:

<https://www.homelesshub.ca/blog/staying-put-reimagining-our-response-preventing-homelessness-mid-size-cities>

Dej, E. (23 February 2021). Reflections on the link between homelessness and criminalization: A student perspective. *Homeless Hub: Research Matters*. Online at: <https://www.homelesshub.ca/blog/reflections-link-between-homelessness-and-criminalization-student-perspective>

Dej, E. (18 December 2020). A complex exile: Homelessness, exclusion, and a call for inclusion. *Homeless Hub: Research Matters*. Online at: <https://www.homelesshub.ca/blog/complex-exile-homelessness-exclusion-and-call-inclusion>

Dej, E., & Schwan, K. (9 October 2019). “Young women’s transitions out of homelessness: Unique pathways, distinct experiences”. *Homeless Hub: Research Matters*. Online at: <https://www.homelesshub.ca/blog/young-women%E2%80%99s-transitions-out-homelessness-unique-pathways-distinct-experiences>

Binch, J., Dej, E., & Ecker, J. (27 September 2018). “Rooming houses – homeless or housed?”. *Homeless Hub: Research Matters*. Online at: <https://www.homelesshub.ca/blog/rooming-houses-%E2%80%93-homeless-or-housed>

Dej, E. (23 March 2018). “Tampon Tuesday: Reclaiming dignity one tampon at a time”. *Ask Me Ottawa*. Online at: <https://www.endhomelessnessottawa.ca/new-blog/2018/3/23/tampon-tuesday-reclaiming-dignity-one-tampon-at-a-time>

Dej, E. (14 September 2017). “Taking the lead: A federal plan for preventing homelessness”. *Homeless Hub: Research Matters*. Online at: <http://homelesshub.ca/blog/taking-lead-federal-plan-preventing-homelessness>

Dej, E., & Gaetz, S. (20 April 2017). “Looking forward: Shifting towards homelessness prevention”. *Homeless Hub: Research Matters*. Online at: <http://homelesshub.ca/blog/looking-forward-shifting-towards-homelessness-prevention>

Dej, E. (16 November 2016). “Giving the essentials: The Backpacks for the Homeless initiative”. *Ask Me Ottawa*. Online at: <https://www.endhomelessnessottawa.ca/new-blog/2018/1/16/giving-the-essentials-the-backpacks-for-the-homeless-initiative>

Dej, E. (20 October 2016). “Canada’s opportunity: Our blueprint for a National Housing Strategy”. *Homeless Hub: Research Matters*. Online at: <http://homelesshub.ca/blog/canadas-opportunity-our-blueprint-national-housing-strategy>

Dej, E. (5 August 2016). ““Keep on breathing”: Jim Jenkins wins at more than soccer in the Homeless World Cup”. *Ask Me Ottawa*. Online at: <https://www.endhomelessnessottawa.ca/new-blog/2018/1/16/o1pq39bn601b3p7byen85w1d9inuyb>

Dej, E. (1 December 2015). “Helping people where they’re at: Rooming house outreach at Somerset West Community Health Centre”. *Ask Me Ottawa*.

Dej, E. (1 November 2015). “‘We care about each other’: Doris Zastre on over 20 years of service with CCOC”. *Ask Me Ottawa*.

Dej, E. (24 February 2015). “Coldest night of the year”. *Ask Me Ottawa*.

Dej, E. (13 November 2014). “Mike Bulthuis – ‘let’s share our stories’”. *Ask Me Ottawa*.

Dej, E. (27 August 2014). “Today I changed the conversation about homelessness”. *Ask Me Ottawa*.

Dej, E. (9 May 2012). “Mental Health Commission of Canada – Changing Directions, Changing Lives: What it Means for Homelessness in Ottawa”. *Ask Me Ottawa*.

Dej, E. (13 December 2011). “A wake-up call for my soul”. *Ask Me Ottawa*.

CONFERENCE ORGANIZING

Sanders, C., Webb, J., Dej, E., Broll, R., Howells, S., O’Grady, B., Popham, J., Sibley, M., Braimoh, J. (29-30 September 2022). *Fostering Inclusive Community Responses to Homelessness*. From NIMBY to Neighbour Project. Guelph, Ontario.

MEDIA

Dej, E. (21 February 2024). Encampments. *The Mike Farwell Show*. *CityNews570*.

Wiens, C. (26 September 2023). Some residents leave Soper Park encampment after being ordered to move. *CTV News Kitchener*. Waterloo Region. Online at: <https://kitchener.ctvnews.ca/some-residents-leave-soper-park-encampment-after-being-ordered-to-move-1.6578794>

Grace, T. (2 March 2023). New insight on homelessness. *CTV News Kitchener*. Waterloo Region. Online at: <https://kitchener.ctvnews.ca/video?binId=1.1807092>

Kraemer, B. (1 March 2023). Pair of WLU researchers to host trio of events in March to discuss homelessness. *City News Kitchener*. Waterloo Region. Online at: <http://kitchener.citynews.ca/local-news/pair-of-wlu-researchers-to-host-trio-of-events-in-march-to-discuss-homelessness-6630483>

McGinty, J. (1 February 2023). Waterloo Region remains liable for dangers posed by encampments. *Cambridge Today*. Waterloo Region. Online at: <https://www.cambridgetoday.ca/local-news/waterloo-region-remains-liable-for-dangers-posed-by-encampments-6465230>

Villella, S. (14 September 2022). Encampment residents told to leave Galt site. *CTV News Kitchener*. Waterloo Region. Online at: <https://kitchener.ctvnews.ca/encampment-residents-told-to-leave-galt-site-1.6068082>

Dej, E., Pin, L., Crompton, L. (10 June 2022). *CKMS Community Connections* with Bob Jonkman. CKMS-FM 102.7 Radio Waterloo. Radio.

Dej, E. (20 April 2022). Episode 6: A hidden epidemic: Homelessness and health inequity. *Health for Homeless* with Kanish Baskaran. Podcast. Online at: bit.ly/listenhfh

Groleau, C. (27 February 2022). Young women often feel alone, isolated as they move from homeless to housed: WLU research. *CBC News*. Kitchener-Waterloo. Online at: <https://www.cbc.ca/news/canada/kitchener-waterloo/erin-dej-wilfrid-laurier-loneliness-isolation-young-women-abla-tsulo-ywca-1.6361547>

Dej, E., Smith, C., Petersen, H., Bute, C., Schwan, K. (24 February 2022). The Loneliness Project. *Women's National Housing and Homelessness Network*. Webinar.

Dej, E. (24 February 2022). Interview – The Loneliness Project - with Craig Norris, *CBC Radio Morning Edition – KW*, CBC Radio, Kitchener-Waterloo. Radio.

Kloss, A.M., Schwan, K., Dej, E., Sanders, C. (Producers). (8 October 2021). Women's homelessness in Canada: A gendered experience. *CRSP Talk*, episode 6. Podcast. Online at: <https://researchcentres.wlu.ca/centre-for-research-on-security-practices/resources-and-publications/crsp-talk-podcast.html>

Dej, E. (3 June 2021). *On the Way Home* with Michael Braithwaite and Stefania Seccia. Podcast.

Dej, E. (12 May 2021). Interview – How we caused and what we can do to end homelessness in Canada - with Craig Norris, *CBC Radio Morning Edition – KW*, CBC Radio, Kitchener-Waterloo. Radio.

Groleau, C. (3 April 2021). Student reflections: Criminology students tackle issue of homelessness through research project. *CBC News*. Kitchener-Waterloo. Online at: <https://www.cbc.ca/news/canada/kitchener-waterloo/wilfrid-laurier-university-brantford-homelessness-criminology-students-research-1.5969355>

Dej, E. (3 March 2021). *CBC Radio Morning Edition – KW* with Craig Norris. Online at: <https://www.cbc.ca/listen/live-radio/1-104-the-morning-edition-k-w/clip/15828026-dismantling-racial-discrimination-homelessness-housing-sector>

Dej, E. (4 December 2020). In Studio with Erin Dej – Author of *A Complex Exile*. *MyAudioFace*, CKWR FM98.5, Waterloo. Radio. <https://www.mixcloud.com/kevin-hiebert/in-studio-with-erin-dej-author-of-a-complex-exile/>

Horwood, M. (23 July 2020). Permanent, affordable housing is needed to protect Ottawa's homeless. *Ottawa Life Magazine*. Ottawa. Print. <https://www.ottawalife.com/article/permanent-affordable-housing-is-needed-to-protect-ottawas-homeless?c=1>

Dej, E. (26 June 2020). The overdose crisis: Canada's forgotten public health emergency. *MyAudioFace*, CKWR FM98.5, Waterloo. Radio. <https://www.mixcloud.com/myaudioface/myaudioface-presents-in-studio-with-erin-dej-ben-scher-the-overdose-crisis/>

Dej, E. (30 March 2020). We must protect the homeless from COVID-19 public health order enforcement. *The Record*, opinion. Online at: <https://www.therecord.com/opinion-story/9920020-we-must-protect-the-homeless-from-covid-19-public-health-order-enforcement/?s=e>

Dej, E. (16 March 2020). Expert interview on impact of loneliness during COVID-19 crisis. *CTV Kitchener*, News. Television.

Dej, E. (20 February 2020). How the homeless are socially excluded in Canada, *CBC All in a Day*, CBC Radio, Ottawa. Radio.

Dej, E. (7 November 2018). How to eradicate homelessness, *No Little Plans: Canada and the Sustainable Development Goals*, Vicky Mochama, Vocal Fry Studios, Toronto. Podcast.

Dej, E., Gaetz, S., & Schwan, K. (8 December 2017). "Housing as a human right is a big deal – Can we do it?". *The Tyee*, opinion. Online at: <https://thetyee.ca/Opinion/2017/12/08/Housing-As-Human-Right-Can-We-Do-It/>

Dej, E. (2017). A New Direction: A Framework for Homelessness Prevention. *Vimeo*. Video. Online at: <https://vimeo.com/213713594>

Gaetz, S., & Dej, E. (25 May 2017). A New Direction: A Framework for Homelessness Prevention. *Homeless Hub*. Webinar.

Dej, E. (21 May 2017). Interview with Jim Brown, *The 180 with Jim Brown*, CBC Radio, Calgary. Radio.

Dej, E. (21 October 2016). Interview with Lee Sterry, *VIP Late Lunch with Lee Sterry* 610 CKTB, St. Catherines. Radio.

Dej, E. (20 October 2016). Interview with Simi Sara, *The Simi Sara Show* CKNW 980, Vancouver. Radio.

Dej, E. (9 October 2014). "Why the suburbs should care about homelessness". *Ottawa Community News*, opinion. Online at: <http://www.ottawacommunitynews.com/opinion-story/4906269-why-the-suburbs-should-care-about-homelessness/>

INVITED CONTRIBUTIONS

Dej, E. (9 March 2024). Panelist. *Hope for Ending Homelessness in Waterloo Region: A Community Dialogue*. Social Development Centre & Ray of Hope. Waterloo Region, Ontario.

Burkholder-Harris, K., Capes, M., Dej, E., Lethby, M., McDonald, C., Nash, G., Stief, J., and York, F. (22 February 2024). *No Fixed Address: A Talk about Homelessness and Encampments*. Waterloo Region Community Town Halls. Waterloo Region, Ontario.

Dej, E. (30 January 2024). Homelessness in Guelph. *Guelph Symposium on Housing and Health*. Guelph, Ontario.

Dej, E. (26 January 2024). The Loneliness Project. Presentation to the Abiona Centre. Toronto, Ontario.

Dej, E., Nichols, N., & Braimoh, J. (30 November 2023). Changing the narrative on homelessness: Addressing NIMBYism and the criminalization of the unhoused. *Ontario Municipal Social Services Association*. Toronto, Ontario.

Dej, E. (22 November 2023). Keynote address. National Housing Day. Waterloo Region, Ontario.

Dej, E. & Paddick, W. (31 May 2023). *Understanding homelessness in Ontario*. Ontario Association of Property Standards Officers Meeting. London, Ontario.

Dej, E. & Paddick, W. (29 March 2023). *Understanding homelessness in Waterloo Region*. Hospice, Waterloo Region. Waterloo Region, Ontario.

Down, S., Schuitema, A., Lee, C., Crompton, L., Dej, E. (7 March 2023). *Charter rights and the encampment ruling: What does it mean for Waterloo Region and Beyond?* Laurier Centre for the Study of Canada & the Unsheltered Campaign. Waterloo Region, Ontario.

Dej, E. & Pin, L. (2 March 2023). *Addressing homelessness in our communities*. Inspiring Conversations. Wilfrid Laurier University. Waterloo Region, Ontario.

Dej, E. & Paddick, W. (12 & 14 December 2022). *Understanding homelessness in Cambridge*. City of Cambridge, Ontario.

Dej, E. (9 September 2022). Invited speaker. A Complex Exile: Homelessness and Social Exclusion in Canada. *Reaching Home, Employment and Social Development Canada*. Gatineau, Quebec.

Dej, E. (14 June 2022). Invited Panelist. Drivers of homelessness in Greater Victoria. *Community Social Planning Council*. Victoria, British Columbia.

Dej, E. (31 May 2022). Keynote: The Loneliness Project. *A Way Home Canada*. Toronto, Ontario.

Dej, E. (26 May 2022). Panelist. The De-institutionalization of housing and homelessness. *Citizens for Public Justice Conference: Seeking Justice in Institutions*. Ottawa, Ontario.

Dej, E. (4 May 2022). Invited Panelist. Ministry of Housing and Diversity and Inclusion Roundtable on Chronic Homelessness – Supports & Tailored Approaches. Gatineau, Quebec.

Dej, E. (25 March 2022). Keynote: Homelessness: What we know and how we can respond. Kiwanis Club of Ottawa. Ottawa, Ontario.

Dej, E. & Sanders, C. (4 November 2021). Invited speaker. *Cambridge Community Well-Being Advisory Committee*. Cambridge, Ontario.

Dej, E. (21 September 2021). Panelist. *Caring for Ourselves and our Neighbours in Brantford*. WLU Centre for Student Equity, Diversity and Inclusion, Brantford, Ontario.

Dej, E. (13 September 2021). Keynote. *A Complex Exile – Homelessness and Social Exclusion in Canada*. Toronto Public Library Culture. Toronto, Ontario.

Dej, E. (17 June 2021). Keynote: The criminalization of homelessness. *Blue Door Shelter Annual General Meeting*, York Region, Ontario.

Dej, E. (16 June 2021). Panelist. *Barrie and Simcoe County YIMBY Week*. Rosewood Park Communities. Barrie, Ontario.

Dej, E. (12 May 2021). How we caused and what we can do to end homelessness in Canada. *Laurier Milton Lecture Series*, Milton, Ontario.

Dej, E. (17 April 2021). A Complex Exile. *Grit Lit Festival*. Hamilton, Ontario.

Dej, E. (18 March 2021). Young women's homelessness. *Champions for Change Club*, University of Ottawa, Ontario.

Dej, E. (12 February 2021). Book Launch - A Complex Exile: Homelessness and Social Exclusion in Canada. *Centre for Research on Security Practices*. Brantford, Ontario.

Dej, E. (7 March 2020). Keynote: Making sense of women's homelessness. *Soroptimist International Women's Day Event*, Cambridge, Ontario.

Dej, E. (20 February 2020). Keynote: Negotiating Exclusion: Managing Homelessness and Making Space for Social Inclusion. *The Alliance to End Homelessness Ottawa Annual Community Forum on Ending Homelessness*, Ottawa, Ontario.

Dej, E. (23 September 2019). Deciphering linkages: Contextualizing youth homelessness and youth justice involvement. *National Youth Justice Network Annual Meeting*. Niagara, Ontario.

Dej, E. (8 March 2019). Understanding homelessness. *Brilliant Women's Talk in Celebration of International Women's Day*. Laurier Brantford Women's Centre. Brantford, Ontario.

Dej, E., & Schwan, K. (5 March 2019). On her own: Young women's experiences of loneliness upon exiting homelessness. *Academic Creative and Engaged Research Showcase*. Wilfrid Laurier University. Brantford, Ontario.

Dej, E. (5 June 2018). Understanding homelessness. St. Margaret Mary's Parish. Ottawa, Ontario.

Dej, E. (23 April 2018). Negotiating exclusion: Experiences of homelessness in Ottawa. The Ottawa Mission Speakers Series. Ottawa, Ontario.

Dej, E. (18 January 2018). Homelessness: Where we got here and where we're going. Presentation to The Ottawa Mission Board of Directors. Ottawa, Ontario.

Dej, E. (27 November 2017). Invited Panelist. If I had \$500 million dollars: Alternatives to mega-jail. *CU in the City Series*. Carleton University, Ottawa, Ontario.

Dej, E. (22 November 2017). Invited Panelist. Reflecting on the National Housing Strategy. *The Alliance to End Homelessness Ottawa Annual Community Forum on Ending Homelessness*, Ottawa, Ontario.

Dej, E. (19 October 2017). Making zero count: Defining an end to homelessness. Presentation to the Homelessness Partnering Strategy, Employment and Social Development Canada. Gatineau, Quebec.

Dej, E. (19 September 2017). Invited Panelist – Homelessness Prevention. *Housing First and Homelessness Prevention. Exploring the Housing First Program and Government Policies that Support It: A Symposium*. Richelieu Park, Ottawa, Ontario.

Dej, E. (13 June 2017). Consultation with the BC Council for International Cooperation on UN Sustainable Development Goals. Vancouver, BC.

Gaetz, S., & Dej, E. (25 May 2017). Webinar. A New Direction: A Framework for Homelessness Prevention. *The Homeless Hub*, Toronto, Ontario.

Dej, E. (24 April 2017). Making sense of homelessness in Canada. *The Ottawa Mission Speaker Series*, Ottawa, Ontario.

Dej, E. (21 March 2017). The state of affordable housing in Canada and where to go from here. *Christie Ossington Neighbourhood Centre Community Liaison Committee Meeting*, Toronto, Ontario.

Dej, E. (22 November 2016). Closing plenary: The National Housing Strategy – what it means for Ottawa. *The Alliance to End Homelessness Ottawa Annual Community Forum on Ending Homelessness*, Ottawa, Ontario.

Dej, E. (24 May 2016). Criminalizing morality. Presentation to Students at St. Francis Xavier Catholic High School, Ottawa, Ontario.

Dej, E. (24 November 2015). Making Sense of Mental Health Resources: Conversations with Ottawa's Homeless Men and Women. *The Alliance to End Homelessness Ottawa Annual Community Forum on Ending Homelessness*, Ottawa, Ontario.

Dej, E., & Rea, B. (28 October 2015). Youth engagement in ending homelessness. *A Day of Information for a Lifetime of Action Conference*, University of Ottawa.

ACADEMIC PRESENTATIONS

Dej, E., McPhee, B., & Hill, D. (9 November 2023). From Roots to Home: Visualizing the journey from homelessness to housing in mid-size cities. *Canadian Alliance to End Homelessness Conference*, Halifax, Nova Scotia.

Oudshoorn, A. & Kusdemir, S. (Nov 8, 2023). Removing the Constraints on Preventing and Ending Homelessness. *CAEH23: National Conference on Ending Homelessness*, Halifax, NS. With contributions from Marshall, C. A., Bilek, M., Shadpour, B., Nelson, A., Wildeman, J., Burkholder Harris, K., Kauppi, C., Gaetz, S., Schwan, K., Buccieri, K., Dej, E., Pelkmans, J., Ball, D., Metersky, K., Watchorn, M. N., Baker Collins, S., Collins, S., Gokani, R., McKenney, C., Schiff, R., Frederick, T., Dunn, J., Kidd, S. A., Bhattacharyya, I., Lau, K., Kennelly, J., Kelford, T., Smuck, T., Bartsch, C., Burse, L., Malenfant, J., & Hira-Friesen, P.

Dej, E. & Braimoh, J. (30 May 2023). NIMBYism in mid-size cities. *Canadian Political Science Association Conference*, Toronto, Ontario.

Dej, E., Lazanja, S., & Braimoh, J. (16 May 2023). The criminalization of homelessness in mid-sized cities. *Critical Perspectives Conference*, Ottawa, Ontario.

Braimoh, J., Dej, E., Sanders, C. (3 February 2023). Somebody's street': eviction of a homeless encampment as interlocking colonial and class relations. *Western Society of Criminology Conference*, Vancouver, British Columbia.

Dej, E., Webb, J., Braimoh, J. (2 November 2022). Staying Put: Reimagining our response to preventing homelessness in mid-size cities. *Canadian Alliance to End Homelessness Conference*, Toronto, Ontario.

Dej, E., Braimoh, J., Woodrow, P. (3 November 2021). Rewriting the narrative on homelessness in mid-sized Canadian cities. *Canadian Alliance to End Homelessness Conference*, Virtual.

Dej, E., Braimoh, J., Sanders, C. (18 June 2020). Engaging with misperceptions on homelessness: Preliminary findings. *National Conference on Critical Perspectives*, Quebec City, Quebec. *postponed due to COVID-19

Dej, E. (13 March 2020). Engaging with misperceptions on homelessness: Preliminary findings. *Power at the Margins II: Mobilizing Across Housing Injustice*, Berkley, California. *postponed due to COVID-19

Dej, E., & Schwan, K. (5 November, 2019). Beyond housing: Loneliness, isolation, and young women's exits from homelessness. *Canadian Alliance to End Homelessness 2019: National Conference on Ending Homelessness*, Edmonton, Alberta.

Dej, E. (25 July 2019). When a man's home isn't a castle: Performing hypermasculinity among men experiencing homelessness and mental illness. *International Association of Law and Mental Health*, Rome, Italy.

Dej, E., Gaetz, S., & Schwan, K. (2 May 2019). Using critical scholarship to drive homelessness prevention initiatives: An effort in depth of field focusing. *Critical Perspectives Conference: From Theory to Practice: Bridging Critical Criminology, Social, and Criminal Justices*, Brantford, Ontario.

Binch, J., Dej, E., and Ecker, J. (6 November 2018). Rooming houses: Homeless or housed?. *Canadian Alliance to End Homelessness 2018: National Conference on Ending Homelessness*, Hamilton, Ontario.

Dej, E. (7 June 2018). Exerting power in the face of powerlessness: Hegemonic masculinity among men experiencing homelessness. *Law and Society Association/Canadian Law and Society Association Conference*, Toronto, Ontario.

Dej, E. (25 January 2018). A new direction: A framework for homelessness prevention. *Ontario Housing First Forum: Linking Research and Practice*, Toronto, Ontario.

Gaetz, S., & Dej, E. (26 October 2017). Preventing homelessness: From framework to implementation. *Canadian Alliance to End Homelessness 2017: National Conference on Ending Homelessness*, Winnipeg, Manitoba.

Dej, E. (30 May 2017). When a man's home isn't a castle: Performing hypermasculinity among men experiencing homelessness and mental illness. *Canadian Sociological Association Conference*, Ryerson University.

Dej, E. (5 May 2017). Representing homelessness: Reinforcing and resisting myths about homelessness in Canada. *Representing Justice: Critical Perspectives on Criminology and Social Justice*, University of Ottawa.

Gaetz, S., Dej, E., & Redman, M. (3 November 2016). State of Homelessness in Canada 2016. *Canadian Alliance to End Homelessness 2016: National Conference on Ending Homelessness*, London, Ontario.

Dej, E. (10 May 2016). Exploring the redeemable/irredeemable typologies: Managing exclusion in the homeless community. *Placing Justice: Critical Perspectives on Space, Justice, Law and Order*, University of Winnipeg.

Dej, E. (1 June 2015). Performing mental illness: How homeless men and women negotiate and manage their mental health identity. *Canadian Sociological Association Conference*, University of Ottawa

Dej, E. (3 June 2015). Imprisoning the free: Conceptualizing the homeless shelter as a neo-liberal total institution. *Canadian Law and Society Conference*, University of Ottawa.

Dej, E. (16 March 2015). Creating a 'second skin': Identity management among homeless men and women. *Suspect Bodies, Deviant Bodies*, University of Ottawa.

Dej, E. (11 June 2014). Punishing the (not) guilty: Tracing the trajectory of the not criminally responsible provision. *Critical Perspectives, Criminology and Social Justice*, Carleton University.

Dej, E. (23 May 2013). 'You know?' I don't: Reflections from an outsider on connecting with a vulnerable population. *Qualitative Analysis Conference: Looking Forward: Perspectives, Methodologies, Stabilities, Redefinitions, and Examples*, Carleton University.

Kilty, J., & Dej, E. (3 May 2013). Certainly uncertain: How *Mabior* further complicates the criminalization of HIV non-disclosure. *Critical Perspectives: Criminology and Social Justice*, University of Ottawa.

Dej, E. (21 June 2012). Tell me about yourself: Identity narratives in the interview setting amongst homeless men and women. *Qualitative Analysis Conference: Culture of Narratives/Narratives of Culture*, Memorial University.

Kilty, J., & Dej, E. (4 May 2012). Examining the discursive effects of drug use on constructions of motherhood. *Critical Perspectives: Criminology and Social Justice*, Carleton University.

Dej, E. (27 January 2012). Who am I? Presentation of self among homeless men and women. *Canadian Law and Society Association Mid-Winter Meeting*, University of Ottawa.

Dej, E., & Kilty, J. (29 May 2011). Anchoring amongst the waves: Discursive constructions of motherhood and addiction. *Canadian Law and Society Association Conference*, University of New Brunswick and St. Thomas University.

Kilty, J., & Dej, E. (12 May 2011). News Media Constructions of Sexuality in cases of Women Accused of HIV Non-disclosure' *Qualitative Analysis Conference: Social Pragmatism as a Conceptual Foundation*. University of Laurier at Brantford.

Dej, E. (1 May 2011). Insisting or resisting mental illness: Re-imagining mental health amongst criminalized homeless individuals. *Critical Perspectives: Criminology and Social Justice*, University of Ottawa.

Kilty, J., & Dej, E. (1 May 2011). The New Weapon of the Femme Fatale: News Media Constructions of Sexuality in cases of Women Accused of HIV Exposure/Transmission. *Critical Perspectives: Criminology and Social Justice*, University of Ottawa.

Dej, E. (11 July 2010). The right to be mad: Criminal justice interventions in the lives of the mentally ill. *British Society of Criminology Conference: Human Rights, Human Wrongs*, University of Leicester, England.

Dej, E. (2 June 2010). Connecting epistemologies: The shifts in the ways of knowing mental illness. *Canadian Law and Society Association Conference*, Concordia University.

Dej, E. (15 May 2010). Reconceptualizing the role of advocacy groups in the creation of the Not Criminally Responsible Defence. *Qualitative Analysis Conference: Social Pragmatism as a Conceptual Foundation*, University of Laurier at Brantford.

Dej, E. (8 May 2010). Speaking on behalf of: The narratives of professional advocacy groups (not the mentally ill) in the creation of the not criminal responsible defence. *PsychOUT: A Conference for Organizing Resistance Against Psychiatry*, Ontario Institute for Studies in Education.

Dej, E. (26 February 2010). The making of the mad movement: Tracing the epistemologies that have constructed the mental illness as toxic. *GSAED Interdisciplinary Conference – Toxicity*, University of Ottawa.

Dej, E. (2 October 2009). Where are the subjugated knowledges? Not criminally responsible legislation and professional advocacy groups. *Canadian Society of Criminology*, University of Ottawa.

Dej, E. (24 July 2009). What once was sick is now bad: Charting the discursive shift from pathologized victim to deviant identity for those diagnosed with fetal alcohol spectrum disorder. *Disorderly Conduct*, Laurier University.

Dej, E. (24 May 2009). Professionalized advocacy groups and amendments to the 'insanity' defence: On the presentation of knowledges. *Canadian Law and Society Association Conference*, Carleton University.

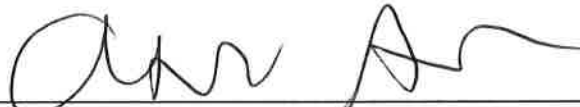
Moore, D., & Dej, E. Consuming justice: When criminal offenders become pathological clients. *Madness, Citizenship and Social Justice: A Human Rights Conference*, Simon Fraser University.

Moore, D., & Dej, E. (5 December 2007). From offender to client: The bizarre case of empowered consumerism in rehabilitative discourse. *Punishment Today: Permanence or Mutation*, Montréal, Quebec.

Dej, E. (18 October 2007). The victim and the deviant: Children and adults with Fetal Alcohol Spectrum Disorder. *Crime, Law and Regulation Conference*, University of Toronto.

Dej, E. (1 March 2007). Fetal Alcohol Spectrum Disorder as an object of regulation. *Department of Law Graduate Student Conference*, Carleton University.

THIS IS **EXHIBIT "B"** REFERRED TO
IN THE AFFIDAVIT OF ERIN DEJ
AFFIRMED THIS 26TH DAY OF MARCH, 2024

A handwritten signature in black ink, appearing to read 'Ashley Elizabeth Schuitema', written over a horizontal line.

ASHLEY ELIZABETH SCHUIITEMA
A Commissioner, etc.,
Province of Ontario,
While a Barrister and Solicitor.
LSO # 68257G

Rewriting the Narrative on Homelessness in Mid-Sized Canadian Cities



2021

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HOMELESSNESS IN MID-SIZE CANADIAN CITIES

Approximately 35,000 people experience homelessness every night in Canada, with evidence that the problem is getting worse.ⁱ The impact of the COVID-19 pandemic on people who are homeless as well as people who are currently struggling to make ends meet cannot be overstated. The pandemic has ravaged Canada's economic and social sectors and homelessness experts have expressed grave concerns about people's loss of housing, growing encampments, and a steep rise in homelessness across the country.

As homelessness becomes more visible in communities across the country, we are witnessing a growing divisiveness in the narratives about people experiencing homelessness. Perceptions of homelessness, discussions about who belongs in the community, and official and unofficial responses to homelessness are deeply contentious. Embedded within narratives about homelessness are misperceptions about its causes, people who experience homelessness, and risks posed to public safety. These narratives have significant negative impacts, including on the sense of belonging among people who are homeless, community resiliency,ⁱⁱ and social inclusion.ⁱⁱⁱ For example, though people experiencing homelessness are more likely to be victims of violence than perpetrators, and are more likely to be arrested for minor nuisances than serious crimes,^{iv} their mere presence in public settings—particularly around commercial businesses—often leads residents to demand intervention by police or by-law in situations where no crime is being committed.^v This can result in adverse interactions with police who are tasked with managing

these precarious relationships between housed citizens and people experiencing homelessness. This scenario, played out repeatedly in communities across Canada, further marginalizes people experiencing homelessness, consumes large amounts of police resources, and often resolves the situation only temporarily.

Given the changing context of homelessness, smaller suburban cities are facing an identity crisis. The desire many long-term residents have in these communities to maintain 'deep roots' comes up against the economic, demographic, and social diversification that they are faced with. These changes are not going away – a 2021 Statistics Canada report^{vi} shows that smaller mid-sized cities across Canada are growing at rates higher than larger metropolitan areas brought on by urban sprawl and growing urbanization. To date, most research on homelessness has focused on large urban centres. As a result, mid-sized cities (pop. 50,000-500,000) struggle to develop evidence-informed policies and practices that are appropriate for their resources and contexts.^{vii}

While homelessness has always been present across different types of communities, its visibility and the subsequent pressure for mid-sized cities to act quickly has come up against their ability to adapt to the changing needs of the community and to respond in a way that

leads to long-term stability and equity for everyone. Such contentions can negatively impact *community resilience* - that is community harmony, sense of belonging, and ability to get along.



COMMUNITY RESILIENCE

Community resilience is a multi-dimensional, dynamic and iterative process that involves collective awareness, action, reflection, adaptation and social inclusion. Community resilience is influenced by social, cultural and structural resources, constraints and opportunities. Central to developing community resilience is the ability to address sustainable, affordable housing, poverty reduction, and access to a continuum of healthcare and mental health resources.^{viii}

Community resilience requires the community to:

1. Develop *conscious collective awareness* of the root causes of problems,

2. Develop *an intention* to set and maintain goals that aim at addressing problems in a long-term, sustainable way,

3. Develop *thoughtful actions* that locate and utilize appropriate and accessible resources.

4. Continually *acquire collective feedback and reflection* on the initiative to allow for adjustments and refinement.

Not all initiatives, when put into practice, will prove successful, however failure can provide insights that will assist in finding new direction or community needs. Thus, it is essential to build feedback loops into all initiatives and to use these feedback loops to solicit reflection from all community members.^{ix}

OVERVIEW OF THE RESEARCH:

The research consisted of a qualitative case study analysis that sought to address the contentious issues surrounding homelessness and public safety in a mid-size urban community in British Columbia, Canada. The goal of the project was twofold: to create a fact-based counter-narrative on the experiences of homelessness and community safety and security, and to think about strategies to address these demographic and social changes while fostering community resilience. To do so we engaged with 3 stakeholder groups: people experiencing homelessness; law enforcement; and other community representatives (i.e., business owners, social service providers, and other residents).



The project was guided by two overarching research questions:

1. How, and in what ways, do the experiences and narratives surrounding homelessness, crime, and public safety converge and diverge among the stakeholder groups?
2. What opportunities for growth exist in mid-sized cities to promote community resilience?



DATA COLLECTION

It was crucial to the research that we involve people who live in the community and who experience the issues described in this summary on a daily basis. Drawing on principles from community-based research, two people with lived experience of homelessness were employed as research coordinators on the project to help support its development.^x As research coordinators, they assisted in: 1) developing interview questions, 2) recruiting people with lived experience to participate in the project, 3) data analysis, and (4) knowledge mobilization.

Data collection consisted of semi-structured interviews and focus groups. Three different sets of interview questions were created for each stakeholder group. We also conducted two focus groups. One focus group involved people with lived experience of homelessness and another involved community stakeholders and service providers. The goal of the interviews and focus groups were to identify similarities and divergent experiences and perceptions within and across stakeholder groups.

All of the interviews took place between September 2019-December 2019. People with lived experience of homelessness were prioritized as participants. In total 54 people participated in the study, specifically: 18 people experiencing homelessness, 16 law enforcement, 14 community members, and 6 service providers were involved in the project.



THE COMMUNITY

The suburban city we conducted this research in has a population just under 100,000 people and, like other mid-sized cities across Canada, has experienced continued population growth in the last five years; growth that is expected to continue for the next decade. This community level change has brought increasing attention to social issues, including homelessness. The research team chose this particular mid-sized city as the case study location due to its size and the substantial media attention the community drew around the heightened politicalized nature of the issue of homelessness. For example, at the time of data collection, the most recent encampment had been legally sanctioned to be cleared; tent residents had been removed from the space legally and forcibly; and a supportive housing program had also just opened in a nearby neighbourhood. Despite these changes, people with lived experience of homelessness were still visible in a climate of deep community tension.

This research brief presents a summary of the contentious narratives among the three stakeholder groups in an attempt to make sense of similarities and differences across narratives.^{xi} Each summary is immediately followed by a suggested opportunity for change aimed at both broader structural systems and community-based initiatives that can assist mid-sized cities across Canada in building community resilience. Broadly, communities need to take into account the social, political, and cultural context in which they operate. Communities must also adopt a collective responsibility^{xii} that involves all levels of government, social services, non-governmental associations, people experiencing homelessness, Indigenous leaders, and the community at large to withstand and address present stressors and enable them to successfully adapt in the face of risk and adversity. Initiatives that are created in collaboration with all members of the community are likely to be accepted and adopted by that community.^{xiii} If community resilience is built (not imposed) and maintained, communities are better positioned to respond effectively to inequity and unforeseen social change.



Encampments

Any space that people experiencing homelessness occupy becomes politicized because the very nature of being homeless and the conditions that have created homelessness in Canada are inherently political. Encampments are political because they are a response to structural failures and systems gaps and fill important needs not met otherwise. Understanding encampments outside of this political context has the effect of erasing an understanding of the space as located on Indigenous land. This narrative also precludes seeing encampments as important spaces for survival and collective well-being. For example, despite municipalities often failing to provide encampments with heat, hygiene, and sanitation infrastructure, they are important spaces for belonging and community building among people who experience homelessness and who in many ways face rejection from the broader community.



Law enforcement (e.g., police and by-law) is often brought in to respond to encampments. When this happens, there is a tendency for the political nature of encampments and the conditions that produce homelessness to be overlooked. Such interventions and attempts at managing encampments can create a critical divide and, at times divisive relationship, between the city and law enforcement that negatively impacts community resilience.

OPPORTUNITY FOR CHANGE

It is imperative that encampments are responded to through a **human rights lens**.

A. Acknowledge that encampments are located on traditional Indigenous lands, and as such Indigenous Peoples' must be meaningfully included in all responses to maintain their enshrined rights to land and self determination.

B. Encampments are always political in nature; encampments must be recognized as a response to local and national housing and homelessness crises.

C. Responses to encampments require municipalities, with provincial/territorial and federal investment and support, to provide adequate and accessible resources and services to those in need. Resources include but are not limited to: access to safe, affordable, and permanent housing; sustainable access to nutritious food; physical and mental health care services; medication; and spaces for community building.

D. Encampments must be recognized for their ability to promote a sense of belonging and family. In order to respond to encampments, people who experience homelessness must have meaningful opportunities to develop strong social networks both among others experiencing homelessness and with the broader community.

E. Any engagement that state actors have with encampments should follow the United Nations Special Rapporteur on Housing's *National Protocol for Homeless Encampments in Canada*^{xiv}

Crime

Like other communities across Canada, law enforcement is used in mid-sized communities to respond to the visibility and presence of people experiencing homelessness. Community members and police are often quick to describe people experiencing homelessness as perpetrators of theft and in some cases violence within encampments. When discussing safety, police in this research noted that rates of serious and violent crimes had decreased in the specific community. These accounts were supported by local police data. However, these facts had not penetrated the public narrative that people who are homeless were dangerous. Nevertheless, what was often missing from these conversations were the instances of violence committed *against* people who are homeless by housed community members.

In this research, the visibility of potentially stolen bicycles and propane tanks in encampments was a source of immense frustration for some other community members which, in turn, negatively impacted police-public relations as police were perceived by some residents as ineffective at responding to these crimes. Several people who experienced homelessness sympathized with this frustration and noted how theft among people experiencing homelessness often occurred as a means of survival, and not necessarily to support substance use. Absent from these narratives, however, were the ways that law enforcement, particularly by-law, tearing down encampments and removing personal belongings are also experienced as acts of theft against people who are homeless.

OPPORTUNITY FOR CHANGE

Deploying law-enforcement for non-emergency situations involving people experiencing homelessness and other under-served populations can escalate situations, create confusion over the presence of law enforcement, and can be potentially life-threatening. To mitigate the overuse of law-enforcement in these situations, mid-sized cities should consider the development of Street Outreach Programs (SOPs).

Street outreach is defined as “moving outside the walls of the agency to engage with people experiencing homelessness who may be disconnected and alienated not only from mainstream services and supports, but from the services targeting homeless persons as well.”^{xv}

In addition to providing people with supports to may help them transition out of homelessness, research finds that SOPs create opportunities for people to engage with dependency/addiction services; reduce contact with the criminal legal system; and improve perceptions of community safety and fear of crime.^{xvi} SOPs in mid-sized communities should consider a variety of delivery methods as the community itself may be geographically expansive or may lack extensive public transit options that would make accessing such services difficult.^{xvii} SOPs should also consider working collaboratively with other service providers; doing so may help increase awareness and use of community supports among underserved populations.^{xviii}

The Visibility of Homelessness & 'They're not From Here'

Access to, and use of, public space is a contentious issue across many communities. In this research, for some community stakeholders any presence of people who presented as homeless in the urban core was a problem, with little openness to shared space. Meanwhile, people who experienced homelessness described not particular locations, but places where they might encounter aggressive and potentially violent community members as unsafe and unwelcoming. In this way, the entire community was described as a potential threat for these types of encounters as community members could be anywhere. Here it is important to note that the use and access to community space is rarely equitable or inclusive; people experiencing homelessness are not able to exercise their same right to public spaces that other community members do. In this research, much of the discussion regarding use of public space centered on the assumption that people who are homeless are a threat to the others who spend time downtown, with little understanding of what that threat is.

Narratives of belongingness were used to respond to the increasing visibility of homelessness in this community. Who counts as a resident of this community and who is an 'outsider' was a common discourse across all three stakeholder groups in this research. Despite data that reveals most people experiencing homelessness in this community are long-time residents, there was a perception that many people who are homeless were brought there by surrounding municipalities. This narrative disincentivized some community stakeholders from wanting to provide good quality services to people who are homeless, fearing

that it would encourage people from all over to come and stay in this community. This lack of response has the effect of increasing feelings of exclusion while failing to provide much needed services for anyone who experiences homelessness in this community.

OPPORTUNITY FOR CHANGE

Cities must create working groups of key players from across their community, including Indigenous leaders and representatives from education, healthcare, community services, employment, income assistance, and with meaningful inclusion of people with lived experience of homelessness to develop three-tiered awareness initiatives that draw from national, provincial, and local evidence to inform all stakeholders about the causes and conditions of homelessness in the community, and to support people who are homeless or at risk of homelessness in accessing services.



Nowhere to Go

In this research, most stakeholders agreed that there is a lack of space and services for people experiencing homelessness in this community. When people who are experiencing homelessness or who are housing insecure are not provided with the resources they need to meet their daily needs, be safe, and have a sense of belonging, it has negative repercussions for the whole community.

While it is clear that having dedicated safe spaces for people who are homeless is essential, these spaces have to be integrated in the community at large so as to build broader community resilience. Such spaces can assist people experiencing homelessness in developing positive social networks and building interpersonal trust among community members and cannot be positioned as tools to separate people who are homeless from the rest of the community.



OPPORTUNITY FOR CHANGE

Mid-sized cities must create spaces for people experiencing homelessness, housing insecurity, and poverty to create community and access resources.

A. People who are homeless require designated spaces where they can be comfortable and where people who are experiencing homelessness, peer outreach workers, staff, and potentially service providers and health care workers can build supportive, trusting relationships.

B. Spaces should be designed and implemented through the expertise and leadership of people with lived experience of homelessness in their own community, who know best what kinds of spaces will be useful and safe for people who are homeless.

C. Spaces should be located in neighbourhoods frequented by people who are homeless and that are easily accessible through public transit. Service providers should work with surrounding neighbours and business to create a strong sense of community investment in the space.

D. Designing spaces must take into consideration the unique context of different people who are experiencing homelessness, potentially including separate spaces and/or programming for Indigenous Peoples, women identifying people, youth, members of the 2SLGBTQ+ community, and other groups.

E. These spaces should be funded by various orders of government for capital as well as long-term operational costs to ensure the sustainability of the space and staff.

Substance Use

Our research found that there was deep disagreement across stakeholders as to the connection between drug use and homelessness. Drug use, especially concern about drug paraphernalia in public spaces and around businesses is assumed to be the result of people who are homeless, with no discussion of housed people using drugs or people who are homeless who do not use drugs. On the other hand, some service providers described the optics of fear regarding drug paraphernalia, with the instances of dirty needles in public parks, or near seniors or children, being uncommon.

There was also confusion among law enforcement and social service providers regarding the availability of, and access to, addiction services within the community; some reported there being very few services available, whereas others noted that the options of addiction services was abundant given the size of the community. The varied, and at times contradictory, understandings regarding community resources negatively impacts the ability to provide immediate support and wrap-around services to those in need. People experiencing homelessness were clear that there must be a variety of services to support people who use drugs, and the strictly abstinence-based available in the city do not meet the needs of the community.

OPPORTUNITY FOR CHANGE

Through a systems coordination strategy, mid-sized cities, in partnership with service providers across the community, should develop a continuum of care model that allows people who are experiencing homelessness to access housing and services that meet their needs.

A. Design a continuum of care model to provide a range of services from abstinence-based housing to harm reduction spaces and services.

B. Offering a continuum of care includes providing supervised consumption sites for the safe use of substances. Services along a continuum of care are integrated so as to allow people to move towards recovery at a pace and in a way that works for them.

C. The Canadian Centre on Substance Use and Addiction (CCSA) offers a [*Best Practices across the Continuum of Care for the Treatment of Opioid Use Disorder*](#)^{xix} to support this endeavour.

Community Services & Supports

Across stakeholder groups, there was a poor understanding of the principles of Housing First as both a philosophy and program model in this specific mid-sized city. This misunderstanding has resulted in an aversion to the evidence of success for Housing First models from some community members.

Our research also showed that there was deep contention between people who experienced homelessness and other stakeholder groups regarding the need for a diverse range of services for substance use. Law enforcement and other community member stakeholders often described the solution to homelessness as exclusively in the domain of mental health and addiction, whereas people experiencing homelessness identified poverty, un- or under-employment, lack of affordable housing, and other systematic issues as leading to their homelessness.

All stakeholders agreed that there are not enough mental health supports in this mid-sized community and in part because of this police are regularly being called to respond to mental health crises, not criminal issues. This visible use of policing as a response to mental health concerns has the effect of making it appear as though there is more crime in certain locations and among particular groups than is truly the case. Further, interviews showed confusion and a lack of awareness regarding what organizations and services are available to provide support for substance use and mental health challenges, and further, what the eligibility requirements are for these available services.

OPPORTUNITY FOR CHANGE

A. Develop competency and resourcing regarding Housing First among all members in the community, following the 5 key principles of Housing First and recognizing that emergency responses (such as shelters) do not constitute Housing First.

B. Build service provider capacity on delivering Housing First programs through the [Canadian Alliance to End Homelessness Training & Technical Assistance](#)^{xx} program.

C. Mid-sized cities should conduct a systems mapping exercise of mental health and substance use treatment services in the community to gain a clear understanding of existing organizations, programs, and services in order to identify any systems gaps that need to be filled to offer a continuum of care for people who are homeless who require mental health and/or substance use care.

*i. Create an accessible resource guide that frontline emergency responders and social service workers can access in order to direct people to immediate supports and care to those in **need**.*



D. In partnership with municipal, provincial/territorial, and federal leaders, mid-sized cities should develop a framework for systems coordination that strengthens inter-agency collaboration and local systems coordination. Multi-sector cooperation is essential for building and maintaining community resiliency. All orders of government, along with a range of governmental departments, Indigenous leaders, and social service sectors should be invited to the table to co-create a plan for strong collaboration across organizations and groups who may not have pre-existing working relationships. Without coordination they may be duplicating efforts or neglecting the needs of some groups.

I. Develop strong local systems coordination to maximize service capacity and develop shared goals and resources to ensure there are service models to meet people's unique needs. [St. John's Homeless-Serving System Coordination Framework](#)^{xxi} provides the tools to develop robust systems coordination.

ii. Prioritize and nurture strong relationships with national and provincial/territorial partners. This may include developing memorandums of understanding, shared learnings across stakeholders, and policy and practice coordination. Building these relationships can ensure all voices are heard and that there is alignment between policies and practices in the community and stakeholder directives, and vice versa.



Role of Community

Only certain people's perspectives are used to make up the public narrative about homelessness in this community. Some participants in each of the three stakeholder groups shared narratives of compassion, mutual aid, support, and understanding about homelessness in the city but these stories are overshadowed by others, most notably people and groups who identify with the local Not In My Backyard (NIMBY) group. This loose collective of people dominates public discourse about homelessness in this community, which has two negative effects.

First, it presents the NIMBY group narrative as the accepted perspective of homelessness in this community, leaving little room to hear from others with differing perspectives in the public realm. It disregards the organizations and people who are making a positive difference in the lives of people experiencing homelessness, including the solidarity among people who are homeless themselves.

Second, the rhetoric that everyone in this community hates people who are homeless and are not interested in long-term, sustainable solutions undermines the legitimate concerns business owners, law enforcement or other community members have and that could be resolved through positive community building strategies. The single-focused rhetoric of demonizing people who are homeless limits opportunities to discuss the ways in which all orders of government, public agencies, homeless-serving organizations, and the public at large have a role to play in ending homelessness in this community and helping to foster community resilience.

OPPORTUNITY FOR CHANGE

Break the narrative on homelessness

A. Mid-sized cities should seek to collaborate with community groups and organizations working with people experiencing homelessness in order to break the present narrative on homelessness by working with their local media and utilize various social media platforms to build an alternative narrative that makes it possible for their respective community to understand homelessness and security in ways that are more reflective of the everyday experiences of its community members and highlights the positive interactions and activities that are happening in the community

B. Mid-sized cities and their specific community partners can use pre-existing social media campaigns to develop a template for breaking the narrative around key points of tension found in the research

C. Social media campaigns should focus on misunderstandings about homelessness, as well as local knowledge on the most important issues to be addressed. People with lived experience of homelessness should be meaningfully involved at each step of the campaign development process.



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A handwritten signature in black ink, consisting of a cursive 'A' followed by a series of loops and a long horizontal stroke.

ASHLEY ELIZABETH SCHUITEMA
A Commissioner, etc.,
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While a Barrister and Solicitor.
LSO # 68257G

FROM NIMBY TO NEIGHBOUR

BROKERING A DIALOGUE ABOUT HOMELESSNESS AMONG PEOPLE EXPERIENCING HOMELESSNESS, LAW ENFORCEMENT, AND THE COMMUNITY



RESEARCH QUESTIONS



- 1 What perceptions exist among community stakeholders regarding homelessness, especially in relation to crime and public space?
- 2 What types of interactions do law enforcement have with people experiencing homelessness?
- 3 How, and in what ways, do the experiences and narratives surrounding homelessness, crime and public safety converge and diverge among people experiencing homelessness, law enforcement, and the community?

This study will interrogate perceptions about people experiencing homelessness as inherently deviant and dangerous, and build a new narrative premised on knowledge sharing and enhancing community resiliency.

The Advisory Group, made up of people with lived expertise of homelessness in each of three cities, will support the development, implementation, and analysis of the research

OBJECTIVES



- To uncover perceptions of homelessness;
- To help Brantford, Cambridge and Guelph communities address unique challenges;
- To allow members of disparate groups to engage in a respectful exchange with the aim of fostering empathy and community resiliency.

1ST PHASE



ENVIRONMENTAL SCAN

- Explores documentation produced over the last 10 years pertaining to policy and planning, council minutes, public resources, by-laws, and law enforcement strategies.
- Uses this documentation to establish a spectrum of official responses to homelessness in mid-sized Canadian municipalities.
- Situates Brantford, Cambridge, and Guelph along this spectrum
- Insights inform understandings of institutional responses to homelessness.

2ND PHASE



INTERVIEWS

- Interviewing key stakeholders: people with lived experience of homelessness; law enforcement, social service, business and residential associations.
- Understanding their perceptions of homelessness, crime, dangerousness, use of public space, and interactions with law enforcement.

3RD PHASE



BROKERED DIALOGUE

What?

- A productive exchange among people experiencing homelessness, law enforcement, and community stakeholders.

How?

- Members of each group discuss their perspective on the issues, which we synthesize and share with members of the other groups in a series of interviews.

Why?

- Individuals are able to speak openly and listen in a way that is safe and appropriate for those who may not otherwise have an opportunity to engage in in-person dialogue.
- Clarifies the nature and scope of disagreements between groups, while uncovering possibilities for change



MEDIA ANALYSIS

- Explores 5 years of newspaper articles from Brantford, Cambridge and Guelph on topics related to homelessness.
- Explores how narratives differ between cities and over time; the language used to communicate policies; and how homelessness is framed in the media.
- Sheds light on how citizens are informed of, and react to, the official responses to homelessness identified in the environmental scan.

RESEARCH TEAM

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POST-DOCTORAL FELLOWS

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PARTNERS & COLLABORATORS

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City of Cambridge
Wellington County
Homeless Hub
Guelph Neighbourhood Support Coalition



Social Sciences and Humanities
Research Council of Canada

Conseil de recherches en
sciences humaines du Canada



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ASHLEY ELIZABETH SCHUITEMA

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Understanding Homelessness



Perspectives from 3 Mid-Sized Cities in Ontario

COMMUNITY MEMBERS WE TALKED TO:

People experiencing homelessness,
Service providers,
Business and Community Organizations,
Fire Department,
Police officers and
Bylaw officers.

COMMUNITY MEMBERS WE TALKED TO:	Total number (n = 86)
People with lived experience of homelessness	29
Service providers	10
Business and Community Organizations	24
Fire Department	3
Police officers	11
Bylaw officers	9

Background

Visible homelessness in mid-sized cities (pop. 50,000 - 500,000) is a relatively new problem. Misconceptions about homelessness have led to divided opinions about how to address homelessness and the general public's feelings of unsafety. This research explores how different community members make sense of the issues underlying homelessness in their mid-sized cities.

What We Did

We interviewed **86 people** across three cities in southern Ontario. We asked about what they thought of their community, interactions with other actors, daily challenges they experience, and their views on the issue of homelessness.



From NIMBY to Neighbour is supported in part by funding from the Social Sciences and Humanities Research Council.



People experiencing homelessness feel marginalized in communities that otherwise pride themselves on taking care of one another.

Communities have invested in "disciplinary" processes, such as complaint-driven responses to encampments and private security companies. These processes create a cycle of displacement for people instead of long-term solutions:

Many community members perpetuate stigma even if they mean well: For example, online groups that were intended to foster safety have become spaces that breed hostility toward people experiencing homelessness.

"There are different security companies around here now. You can't do anything. You're stopped and they're like 'move along,' right? It's freezing cold and in the middle of the night sometimes. No, I'm not bothering anybody. But [private security] tells me I have to leave because they will call [police]"

- Person Experiencing Homelessness

"It's a little concerning with the amount of people that are actively hunting just looking for these people to try to report them and get them out."

- Law Enforcement Officer



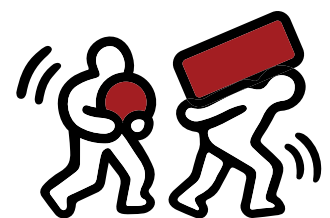
Communities need different first responders.

Many communities rely on law enforcement as first responders because there aren't always appropriate resources available in mid-sized cities for specific situations:

Some communities are finding success in public health supports to address the opioid overdose crisis, as opposed to law enforcement. This demonstrates that non-traditional response options can fill an important void in the current response system.

"They're getting paid to help the people, not put them in worse situations. But other than that, they're not social workers, they're not psychologists, they're police officers."

- Person Experiencing Homelessness



We Need Responses that Build Community Resilience.

Contrary to popular belief, people experiencing homelessness are much more likely to be residents who have lived in an area for a long time, rather than people relocating from other cities.

Over 3 in 4
are locals.

Across the three cities, an average of 76% of people who are homeless had lived in the city for 5 years or more.

COMMUNITY RESILIENCE - harmony, a sense of belonging and ability to get along - is built through the inclusion of all community members, including people who are vulnerable, marginalized, and underserved.

It is in the best interest of all community members to invest in structural solutions rather than only individual responses:



"I think the biggest problem with everything that's going on right now is everybody is so focused on being an individual and meeting their needs and living their life and doing things on their terms... we've lost a sense of compassion. We only look out for ourselves, and nobody else... Homeless people are not disposable. They all have stories, they all have circumstances that caused them to be there. And if you just stop looking at them like a disease and cared enough to help, maybe we could [help]."


- Business Owner

Misunderstandings about person-first approaches, (e.g., consumption and treatment sites and Housing First) can lead to people opposing supports with long-term benefits. However, communities finding the most success are those that have focused on building strong connections between community members.

So What's Next?

This research highlights pressure points among community stakeholders about the issue of homelessness in their communities. To learn what practical steps we can take to address this issue, check out the [**NIMBY to Neighbour**](#) series on the Homeless Hub.

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Is there community in encampments?

Background

Homelessness is rising in Canada and across the globe as economic and social inequity deepens (Bainbridge & Carrizales, [2017](#); Infrastructure Canada, [2024](#)). There are over 150 million people who are homeless worldwide (Farha, [2019](#)) and at least 235,000 individuals experience homelessness in Canada each year (Gaetz et al., [2013](#); Strobel et al., [2021](#)). Encampments are one of the most visible manifestations of homelessness. Encampments, sometimes also referred to as tent cities, are temporary structures occupied by unhoused individuals, often in urban spaces (Boucher et al., [2022](#); Farha & Schwan, [2020](#); Speer, [2017](#)). The size and nature of encampments varies widely, from large, organized spaces to a small group of people who mostly exist independently of one another. Encampments have become a focal point of discourse by the general public and decision makers, often centered on concerns around the use of public space (Robillard & Howells, [2023](#)). Health and safety risks for both encampment residents and the surrounding public drive public narratives about homelessness (Olson & Pauly, [2021](#)). Where access to housing and supports are woefully absent, responses to encampments commonly consist of sweeps that displace and criminalize residents (Boucher et al., [2022](#); Braimoh et al., [2023](#); Gordon & Byron, [2021](#); Herring et al., [2019](#)).

While encampments have existed for decades (Chan McNally, [2022](#); Speer, [2017](#)) the COVID-19 pandemic exacerbated homelessness and unsheltered homelessness specifically. Unsheltered homelessness, comprising of people living and sleeping on streets, parks, in vehicles, abandoned buildings, encampments, and other outdoor locations, increased by 88% from 2018 to 2022 (Infrastructure Canada, [2024](#)). During the pandemic, encampments were a response to reduced shelter capacity and safe distancing practices (Allegrante & Sleet, [2021](#); Olson & Pauly, [2021](#)) and have come to be a viable living option for people who do not have access to safe, accessible, and permanent housing. Advocates recognize that encampments are not the solution to homelessness, but until such time as there are housing solutions to meet unhoused people's needs, encampments act as a means for people who are otherwise excluded from the housing continuum to assert their human right to housing (Farha & Schwan, [2020](#)). Despite the constant struggle to meet basic needs and the regular threat of sweeps and displacement, encampments allow unhoused people to meet a vital social need that is regularly denied to them in other settings. Public discourse often overlooks the fact that encampments not only meet a material need by way of a tent or structure but can also have immense social and psychological benefits. People who are homeless commonly face isolation and loneliness as a result of ongoing discrimination, exclusion, and negative stereotyping in public spaces (Boucher et al., [2022](#); Dej, [2020](#); Rokach, [2005](#), [2014](#); Sanders & Brown, [2015](#)). Encampments can offer a sense of stability and community, elements that are hard to come by when experiencing homelessness.

Purpose

The purpose of this brief is to examine the role of encampments in providing interpersonal connection and a sense of community for people who are unhoused. The findings from the research covered in this brief defy narratives from some concerned citizens and decision makers who situate encampments as an always and already dangerous and chaotic environment. In contrast to this narrative, research that prioritizes the lived expert voices of people who reside in encampments demonstrate that understandings of ‘home’ do not always correlate with a physical domestic structure, and instead are intimately tied with social relations and community that are key to a sense of belonging. We recognize that while encampments offer an opportunity for flourishing community, in some cases they can also be spaces of violence and harm. The same is true for people who reside in traditional homes, especially considering the rates of violence against women and gender diverse people (Sardinha et al., [2022](#)) and the exceptionally high rate of overdose in homes (Ministry of Mental Health and Addictions, [2019](#)). In this brief we do not shy away from this reality, but consider how encampments can offer a way to address harm and insecurity that prioritizes a personal sense of safety and community care. This brief identifies the ways in which encampments can offer a space of community and provide social connection and belonging for people who are unhoused.

Evidence from Existing Studies

Encampments are the result of human rights violations that deny people access to truly affordable housing that meets their needs. They are also an example of people asserting their human right to housing given the extremely limited options available to them (Farha & Schwan, [2020](#)). People’s pathways into, and experiences of, homelessness vary and reflect an interplay of structural, systemic, and individual factors (Gaetz et al., [2017](#)). Many unhoused people struggle with physical, mental health, and substance use issues (Fitzpatrick, Bramley & Johnsen, [2013](#); Gaetz, [2010](#); Shariff et al., [2022](#); Zufferey, [2017](#)). These conditions can be causal to homelessness but are almost always made worse by the experience of homelessness (Gaetz et al., [2013](#)). Given the challenges that create vulnerability to homelessness, many people who are unhoused have small and fragmented social networks (Bower et al., [2018](#)). A breakdown of family relations, trauma, or interactions with the child welfare and justice system are systematic factors that create homelessness and simultaneously fracture social connection (Dej et al., [2020](#); Gaetz et al., [2016](#)). Adverse experiences such as victimization before or while homeless can also negatively impact an individual’s ability to trust others and build connections (Kryda & Compton, [2009](#)). In addition, exclusionary laws (i.e. ticketing panhandling) and negative stereotypes isolate the homeless population from the rest of society (Eisenberg, [2017](#); O’Grady et al., [2013](#); Wolch et al., [2014](#)).

The range of factors that negatively impact people’s housing stability and leave them at risk of homelessness simultaneously create the conditions for social disconnection and isolation. Strong connections to family and natural supports are well documented as a key to preventing homelessness and maintaining housing stability, especially for young people, but for many people experiencing homelessness it is the lack of a supportive family and network that precipitates homelessness (Borato et al., [2020](#); Schwan et al., [2018](#)). Even for people who have strong connections before becoming homeless, feelings of shame over their status as homeless can lead them to withdraw from support systems (Dej, [2020](#); DeOllos, [1997](#)). The exclusion and social isolation people experience while homeless often continues once they are housed,

with lived experts reporting ongoing loneliness, disconnection, and exclusion that increases their housing instability and risk of returning to homelessness (Dej et al., [2023](#); Kidd et al., [2016](#); Marshall et al., [2020](#); Perron, [2014](#); Thulien et al., [2018](#)).

Social relationships play an important role in determining someone's social, mental, and physical well-being (Holt-Lunstad, [2021](#); Wang et al., [2023](#)). For populations who are especially likely to experience isolation and loneliness, developing and maintaining social connections is of utmost importance. From an outside perspective, residing in an encampment may not seem like the best option compared to the shelter system or other forms of temporary housing. However, the effectiveness of encampments at building connection, support, and fostering a sense of belonging make it the more desirable option for some people who are homeless, especially given the lack of alternative options for permanent, accessible, and truly affordable housing (Cohen et al., [2019](#)). More recently, there has been a growing recognition of the social aspects that encampments can provide to this population.

Social connections

The sense of connection in encampments is in part a response to the disconnection embodied in the shelter system and broader community. Due to severe capacity limitations and the increasing complexity of need, emergency shelters are overwhelmed, which can create a challenging environment for people in distress or who have experienced trauma (Quirouette, [2016](#)). For equity deserving groups, such as women and gender diverse people, Indigenous people, people who identify as 2SLGBTQ+, and youth, shelter spaces that meet their needs may not exist in their community and/or may not be safe spaces (Abramovich, [2017](#); Anderson & Collins, [2014](#); Ecker, [2020](#); Schwan et al., [2021](#)). Shelters are not accessible to everyone; for example, given that most shelters are abstinence-based, people who use substances are not able to stay or risk being restricted from services (Kerman et al., [2022](#)). Likewise, the unpredictability of shelters, including limitations on the length of stay or daily concern that a bed may not be available that night, make shelters a risky or unreliable option (Cusack et al., [2021](#); Herring, [2014](#); Sereda, quoted in *Waterloo v. Persons Unnamed*, [2023](#); Olson & Pauly, [2023](#)). Most shelters have policies and rules that are designed to manage such a large group of people, but in doing so, can limit people's ability to maintain existing social connections and build new ones (Cohen et al., [2019](#); Loftus-Farren, [2011](#)). For example, few emergency shelters allow couples to stay together or pets to accompany people. The love and companionship offered by a partner or a beloved pet leave some people to choose staying in an encampment where they can remain together, rather than be separated in the shelter system (Howe & Easterbrook, [2018](#); Irvine, [2013](#); Kerman et al., [2019](#)). Research demonstrates that pets are non-judgmental and offer unconditional love to people experiencing homelessness, that in turn directly addresses loneliness and acts as a motivating force for individuals to maintain their health and well-being (Irvine, [2013](#); Rew, [2000](#)). Many people prioritize the sense of connection that comes from a partner or pet over shelter, which speaks to the power of belonging in people's lives.

Not only do encampments offer the opportunity to keep people together, they provide a practical source of mutual aid and resource sharing that is essential to surviving homelessness. Unlike most emergency shelters where there is a high rate of fluctuation in who resides there on any given night, the relative stability in people staying at an encampment creates the conditions where people get to know one another and often work together to meet their basic needs. It is common for people in encampments to share food, blankets, and tents with one another

(Boucher et al., [2022](#); Speer, [2017](#); Young et al., [2017](#)), as well as social supports, stories, and other critical features of community and culture (Mitchell & Selfridge, [2017](#)). Indeed, the Federal Housing Advocate's ([2024](#)) investigation of encampments found that, “established encampments have informal systems through which residents look out for each other. In other words, they are a community with a kind of safety net of their own” (p. 13). Some encampments with more formalized governance systems have rules around resource sharing, including obligations around cooking meals for the residents, as well as cleaning and security duties (Loftus-Farren, [2011](#); Speer, [2017](#), [2019](#); Young et al., [2017](#)). Sparks ([2016](#)) describes the high level of structure at an encampment in Seattle, where a system of voting, governance, and assigned tasks for encampment management provided residents with a sense of social cohesion, responsibility, and pride. More informally, Boucher et al. ([2022](#)) provide a detailed picture of how community organizing and mutual aid took shape as encampments grew during the COVID-19 pandemic, ensuring people had access to survival items, such as sleeping bags, food, and clothing, and provided support to maintain their physical and mental health. As one of the participants in their study noted: “We all know what everybody needs and get it done and that’s that. And we all go out for the day, hustle, come back and put it all in a pot, and pool it all together. ... It’s like a little village, you know? We all take care of each other” (Boucher et al., [2022](#), p.4). Not only does resource sharing support people to meet their immediate needs, research shows that it creates a sense of obligation and responsibility among encampment residents that builds social bonds and a sense of community (Loftus-Farren, [2011](#); Young et al., [2017](#)).

The most dominant theme across the research is that encampments offer a sense of community and belonging that is lacking in other living arrangements. Beyond meeting material needs, the psychological sense of community found in encampments is powerful and often overlooked among politicians and decision-makers (Young et al., [2017](#)). Research describes this sense of community as ‘community connectedness,’ ‘solidarity’ (Boucher et al., [2022](#)), ‘a larger collective’ (Sparks, [2016](#); Speer, [2017](#)), and as ‘a family’ (Loftus-Farren, [2011](#)). As expressed by an encampment resident, “You can remove tent city but you can’t remove this society” (quoted in Braimoh et al., [2023](#), p. 23). The creation of a street family is not new (Mosher, [2015](#); Smith, [2008](#)); connection and kinship are enhanced in encampments where people share space and are regularly in communication with one another (Blue Sky et al., [2022](#); Loftus-Farren, [2011](#)) – including through unhoused youth’s use of social media and other technologies that support connections (Selfridge, [2016](#); Selfridge & Mitchell, [2019](#)). The solidarity and connectedness found in encampments exists in direct opposition to the exclusion and stigmatization that unhoused people experience in public (Boucher et al., [2022](#); Dej, [2020](#)). Encampments offer a sense of home for people who have lost their familial home or who have not had a positive home life in the past. By describing encampments as home, residents position the space and people who make up the encampment as people with whom they rely on, care for, and offer a sense of comradery and safety (Speer, [2017](#)).

Safety

People who are unhoused lack benefits such as safety and privacy that people who are housed enjoy (Junejo et al., [2016](#); Skolnik, [2023](#)). Living life in public spaces increases the likelihood of criminal justice involvement for engaging in activities that are not illegal for people who have access to private space, such as urinating, consuming alcohol, or relaxing (Chesnay et al., [2013](#); Dej, [2020](#); Gaetz, [2010](#); O’Grady et al., [2013](#)). The criminalization of homelessness

(Aykanian & Fogel, [2019](#)) means that simply existing as someone who is homeless in public can mean a risk of being displaced, ticketed, or arrested (Gordon & Byron, [2021](#); Herring, [2014](#); Speer, [2019](#)) – reinforcing inequalities among impacted populations (Card et al., [2021](#)).

In focus: Connecting to land

For Indigenous Peoples, connection and belonging is at the heart of what it means to exist. Relationality is part of the human experience and an obligation to care for the world around us. For Indigenous Peoples, connection extends beyond people to also include land, plants, animals, water, and spirituality (Wilson, [2008](#)). Because of this deep connection to the world, the western definition of homelessness that focuses on a lack of a physical structure does not accurately capture Indigenous Peoples' experiences. Instead, Indigenous homelessness is defined as a loss of All My Relations – that is a loss of community, kinship, land, language, and culture (Thistle, [2017](#)). As Christensen ([2013](#)) describes, “Indigenous homelessness can be connected to a much more pervasive exclusion embodied in a kind of material and social ‘dis-belonging’ (p. 815). In this way, Indigenous people often feel a sense of home when they are on their land and connected to one another, even if they do not have a roof over their head. Encampments can offer a space for Indigenous people to be together and hold stewardship over their land. Evicting encampments where Indigenous people reside, then, acts as a continuation of colonial land dispossession, displacement, and disconnection (Braithmoh et al., [2023](#); Flynn et al., [2022](#)). The National Protocol for Homeless Encampments in Canada (Farha & Schwan, [2020](#)) identifies national and international human rights obligations that require governments to recognize the distinct rights and self-determination of Indigenous Peoples that includes not forcibly removing them from their lands and requiring meaningful consultation with Indigenous leaders in creating homelessness, encampment, and housing policies.

Not only does living in public and semi-public spaces increase unhoused people's risk of criminalization, so too does it make them more vulnerable to victimization. In fact, people who are homeless are more likely to be a victim of crime than they are to engage in criminal activity (Novac et al., [2007](#)). Being a victim of crime, and especially assault and abuse, is both a cause of homelessness and exacerbated by the conditions of homelessness (Asberg & Renk, [2015](#); Broll & Huey, [2020](#); Gaetz, [2009](#)). One study found that between 27 and 52% of unhoused individuals had been assaulted (physically or sexually) within the past year (Fazel, Geddes & Kushel, [2014](#)). Specific populations, including women, youth, and 2SLGBTQ+ people face a disproportionate risk of victimization than their housed counterparts and other people who are experiencing homelessness (Coolhart & Brown, [2017](#); Kerman et al., [2023](#); Kushel et al., [2003](#); Schwan et al. [2021](#)). Although encampments can be a site of violence and victimization, encampment residents consistently describe them as safer than alternative living arrangements (The Office of the Federal Housing Advocate, [2024](#)).

Encampments can act as sites of increased safety compared with other living spaces, such as emergency shelters or living outside alone. Whether due to organized security efforts by encampment residents (Sparks, [2016](#)) or informally through mutual aid, regular check-ins (Boucher et al. [2022](#)), and consistent access to outreach support (Herring, [2019](#)), encampments provide the number of people and consistency for relationship building necessary to create a sense of safety for residents (Junejo et al., [2016](#); Loftus-Farren, [2011](#)).

The mutual protection offered in encampments is described as safety in numbers, but more than that, the sense of safety goes hand in hand with being part of a community (Cohen et al., [2019](#)). In the Office of the Federal Housing Advocate's public engagement sessions on encampments, a service provider explained how encampment residents create safety for one another:

People look out for each other in encampments. This doesn't mean that conflict or challenges don't happen. Of course they do like in any communal living situation [...] People may watch over each other's belongings, pets, etc. Or also support each other if facing a physical threat. I have seen people break up disagreements and fights among other people in a respectful way. I have also seen people protecting a woman fleeing an abusive partner, by taking turns staying with her or near her tent." (as quoted in the Office of the Federal Housing Advocate, [2023](#), p. 20)

Many encampments build safety protocols and, "establish a care network outside of traditional systems" to provide as much safety as possible within the conditions of encampments, with a participant in the engagement session in Vancouver astutely noting, "Residents know each other better than people who live in a high-rise" (The Office of the Federal Housing Advocate, [2023](#), p. 20)

While the network of connection created in encampments can provide safety to many, it is important to recognize that they also leave some people vulnerable to violence. Women and gender-diverse people, as well as youth and people with disabilities, are at risk of harassment, violence, and sexual exploitation within encampments. This risk of violence and harm is not unique to encampments; unfortunately, it is a common occurrence for women and gender-diverse youth who experience homelessness in all its forms (Gordon et al., [2022](#); Schwan et al., [2021](#); Reid et al., [2021](#); Watson, [2016](#)), not only from intimate partners, but from others, suggesting that women and gender-diverse people are subject to multiple, co-existing threats (Riley et al., [2014](#)). While encampments can be a site for this violence, many women and gender-diverse encampment residents have been vocal that encampments ultimately make them safer than accessing shelter, most of which are co-ed, or returning to a violent relationship and home (The Office of the Federal Housing Advocate, [2023](#)). Because of the potential intermediary effect of encampments between women and perpetrators of violence, research shows that encampment sweeps and evictions remove systems of safety they have established and put them in increasingly unsafe situations and at greater risk of violence and harm (Flynn et al., [2022](#); The Office of the Federal Housing Advocate [2023](#), [2024](#)).

Safety for encampment residents also comes in the form of privacy. While community is built from being together, strong relationships come from having space to be alone and build relationships on their own terms rather than constantly having to share space with strangers. As described by Dej et al. ([2023](#)), most of the young people they spoke with who were transitioning from homelessness to housing were around people all the time, whether in transitional housing or with roommates. They described loneliness as not an absence of people, but a lack of strong, meaningful connections. As one participant noted in that study,

Most of us have a lot of people around us, which makes us feel... You can tell someone I am feeling lonely and they say oh go talk to this person or that person. But talking to those people is a distraction and only keeps you busy at that moment. If you feel like,

that connection, bond, it's not there... I think that is being lonely (Nadia, as quoted in Dej et al., 2023, p. 19)

The privacy afforded by encampments – that is, having their own tent that they can close at any time, provides a sense of safety that differs significantly from shelters, many of which are congregate spaces where many people sleep in the same space. Privacy allows encampment residents to address their physical and mental health concerns, to minimize the sleep deprivation that often results from staying in shelters or sleeping outside, and allows people to create a network of relationships organically and in a way that meets their needs, ultimately creating more satisfying and longer lasting connections (Cohen et al., 2019; Speer, 2017; Waterloo v. Persons Unnamed, 2023).

Stability

The ways in which encampments facilitate community and connection as described above are contingent upon the stability offered by encampments, in comparison to other living arrangements (Finnigan, 2021; Sparks, 2016). Stability looks like providing people with autonomy, access to resources, and the practical components that make surviving homelessness more bearable.

Encampments allow residents to exercise self-determination, especially compared with emergency shelters. Given the overwhelming number of people in need, shelters often must institute strict rules to manage people staying in these spaces (Flynn, 2024; Herring, 2014). This may include limitations on access to a bed, scheduled meal and leisure times, and specific appointments for showers, laundry facilities, and other daily activities (Dej, 2020; DeOllos, 1997). Encampments allow people to structure their day and meet their needs in a way that works for them. They can escape the crowd at any point, access their belongings throughout the day, and eat or sleep at a time that works for them (Junejo et al., 2016; Speer, 2019). Boucher et al. (2022) explains that in an encampment this flexibility is based on *relational autonomy*, which “highlights how people’s agency cannot be understood without considering their interdependence with other people and environments” (p. 2). Encampment residents’ autonomy is intimately tied with their collective efforts in that, “engaging in mutual support may be considered an act of exercising autonomy in a relational way, as well as a way in which marginalized people actively resist their isolating social environments” (Boucher et al., 2022, p. 2). In what may appear as a paradox, it is the connections and relationships developed in the encampment that creates the conditions for people to assert their independence and feel more control over their lives than in other settings.

Not only do encampment residents gain a sense of belonging from people they live with, outreach workers and service providers are also key to providing connection and a sense of acceptance (Dej et al., 2023). Living in an encampment means that providers know where to locate a resident so that they can check in and follow up on service provision, including medical appointments and medication, substance use support, housing and income access, managing paperwork and documentation, and support navigating institutions such as the child welfare or criminal justice systems (Cusack et al., 2021; Chan McNally, 2022). Encampments offer what Olson and Pauly (2023) describe as *precarious stability*, that is, physical and geographic stability of staying in one place that improves their “physical, mental, spiritual, and emotional health” (p. 131) but one that is under constant threat of being undermined by sweeps and eviction through trespass notices. As an encampment resident in Victoria, BC, described:

At tent city I realized that I need a solid foundation to organize other things from and not be stressed out—from there I can start working on my life and figuring it out. I have found this at tent city. I am noticing that am able to function better and keep better track of day-to-day appointments and to better organize my life in general. (ST24, as quoted in Olson & Pauly, [2022](#), p. 131).

The ability to connect with service providers over weeks or months means that encampment residents can meet needs beyond basic survival and address their overall well-being (Boucher et al., [2022](#); Olson & Pauly, [2023](#)). Conversely, access to services, belongings, and a place to stay is severely threatened when encampments are evicted. Evictions lead to isolation, a loss of connection to services and residents, threaten people’s physical and mental health, and often result in people losing their belongings that are essential to survival (Blomley et al., [2022](#); Boucher et al., [2022](#); Sereda, quoted in Waterloo v. Persons Unnamed, [2023](#)).

Case Study: In Search for a Home Amidst Denver’s Ban on Camping

Langegger & Koester ([2017](#)) investigate Denver, Colorado’s quality of life law that bans camping, “residing or dwelling temporarily in a place, with shelter, on any public or private property in the city.” In essence, the law requires unhoused people to ‘move along’ or find shelter. As a result, individuals residing within encampments are placed in a state of perpetual motion where they are unable to stay in a singular space long enough for the social production of ‘home’. A ‘home’ is intrinsically produced through one’s relations to people and place. Maintaining a permanent camp allows time for residents to attach meaning to their space. This includes a designated area to leave one’s belongings, decorate, and engage in routinized behaviours. One participant, in describing his night routine with his partner at their tent explains, “we go home and there’s a bed already set up and a place to rest and we have an iPad so we’ll watch movies at night” (p. 458). Laws that continually uproot individuals dislocate them from places attached with meaning. Therefore, participants emphasize that maintaining a permanent camp allows for the production of ‘home’.

Encampment residents identified autonomy, self-reliance, and interpersonal bonds as the characteristics of a home. These qualities are available in encampments but are often absent in shelters, where residents described being treated like children who must adhere to strict rules and regulations. In encampments, on the other hand, people exercised autonomy and self-reliance by arranging practical and decorative items, hosting friends, and cleaning and maintaining their site. From these actions, participants expressed they felt “attached to their personal histories and fully present in the here and now” (p.461). Encampment residents were able to develop interpersonal bonds through “proffered networks of aid, labor, sharing, and commiseration” (p.462). These insights demonstrate the importance of stability in the pursuit of a ‘home’ amidst anti-homeless management techniques.

Analyses from The Canadian Alliance for Social Connection and Health

Using data from the 2021 Canadian Social Connection Survey, we examined the social health needs of individuals who were now or previously unhoused. In the survey, 130 participants reported being currently unhoused or having had a history of being unhoused. In comparing these individuals to individuals without a history or current experience of being unhoused, the

unhoused individuals reported higher scores on the Everyday Discrimination Scale ($\beta = 0.675$, $SE = 0.184$, $p < 0.001$), greater loneliness ($\beta = 4.541$, $SE = 1.102$, $p < 0.001$), and lesser support from family ($\beta = -0.764$, $SE = 0.132$, $p < 0.001$), friends ($\beta = -0.679$, $SE = 0.120$, $p < 0.001$), and significant others ($\beta = -0.772$, $SE = 0.136$, $p < 0.001$). All models controlled for age, gender, ethnicity, and household income. These findings suggest that individuals with experiences of homelessness have elevated social health needs, and highlight the need for enhanced social and community supports within encampments and other housing systems.

Discussion

The existing evidence emphasizes the importance of social inclusion and community connection as pivotal in the lives of encampment residents. For people who are excluded from society, social connections, security, and stability, encampments can be a space of non-judgement, mutual care, and stability. The feeling of belonging and the creation of community has material, social, and psychological benefits, providing a sense of safety and security for many residents. Maslow's hierarchy of needs indicates that people will prioritize physiological needs (breathing, food, water, shelter, sleep, etc.) and when those needs are met they can address safety needs such as health, and then a sense of love and belonging (McLeod, [2024](#)). Research on encampments indicates that the sense of belonging, friendship, and connection is so powerful and essential to human life that many encampment residents prioritize it over the limited shelter options available. A sense of belonging and meeting physiological needs are mutually reinforcing. The community created in many encampments provide trusting relationships and the care offered to one another ensures their survival in harsh and hostile conditions.

While encampments are not a substitute for permanent, truly affordable, and appropriate housing, until that housing is available to everyone encampments provide a much-needed community of care. Policy makers and service providers can learn valuable insights from how encampments are organized and operated, providing opportunities for organic community development, relationship building, radical acceptance, and a sense of responsibility over space and caring for others. Housing options that embody these attributes will not only meet Canada's human rights obligations; they will enhance stability by providing connection and belonging that everyone needs to not just survive, but thrive.

Conclusion

Based on the evidence summarized above, we recommend policies and practices that support the inclusion of unhoused populations, foster belonging within their communities, and respect their basic human rights.

Suggested Citation: Erin Dej, Kaitlin Humer, Kiffer Card. (2024). "Evidence Brief – Is there community in encampments?" Canadian Alliance for Social Connection and Health.

THIS IS **EXHIBIT "F"** REFERRED TO
IN THE AFFIDAVIT OF ERIN DEJ
AFFIRMED THIS 26TH DAY OF MARCH, 2024

A handwritten signature in black ink, appearing to read 'Ashley Elizabeth Schuitema', written over a horizontal line.

ASHLEY ELIZABETH SCHUITEMA
A Commissioner, etc.,
Province of Ontario,
While a Barrister and Solicitor.
LSO # 68257G



Upholding dignity and human rights: the Federal Housing Advocate's review of homeless encampments

Final report



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NOTE OF GRATITUDE

As Canada's first Federal Housing Advocate, my role is to drive change on key systemic housing issues and to hold government decision makers to account for their human rights obligations related to housing and homelessness. The right to adequate housing means that all people are equally entitled to live in dignity in a safe and secure home without discrimination or harassment. Recognizing housing as a human right means that government "duty bearers" at all levels have legal obligations to protect this right for everyone, and especially for people whose right to housing is being violated.

During the past year, I have had the privilege of meeting with and hearing from people who have experienced encampments across the country. First and foremost, this report is designed to place them at the centre of efforts to address homelessness. I want to thank them for sharing their stories and insights. I also want to recognize and commend their courage and resilience in the face of systemic failures to uphold their human rights.

As you read my Final Report and reflect on my recommendations, I urge you to consider how your actions can better respect, protect and fulfill the human rights of people experiencing homelessness and living in encampments.

I live and work much of the time in unceded Anishinabe Algonquin territory and have appreciated the opportunity to visit the territories of First Nations, Inuit and Métis peoples to learn more about the challenges of Indigenous Peoples related to encampments. My discussions across the country have highlighted the direct links between homelessness, encampments and the colonial dispossession of land.

My report would not have been possible without the work of national and local advocates who are working tirelessly to support people in encampments. This report has also been enriched through discussions with duty bearers from all levels of government. I thank all those who met with me or provided information for my review and I was encouraged to learn more about how human rights principles are informing responses in a number of places.

I recognize my work does not end with the launch of my report. I will continue to work with all governments to push for the implementation of my recommendations and hope this report can be used as a tool to support local advocacy to protect the human rights of people experiencing homelessness.

Change depends on all of us working at all levels, starting in our own communities.

Sincerely,

Marie-Josée Houle, Federal Housing Advocate

Please see Annex A for the list of key partners who contributed to the review and to this report.

EXECUTIVE SUMMARY

Canada's homeless encampments are a national human rights crisis.

A growing number of people in Canada are having to live in tents or informal shelters to survive due to a lack of affordable housing, limited support services, and nowhere safe to go.

There has been a significant rise in encampments in the last five years, and particularly since the COVID-19 pandemic. Encampments are now being reported across the country – in both large and small municipalities, as well as in more rural areas.

Encampments are not a safe or sustainable solution for housing. For people living in these encampments, every day is a matter of life and death.

At the same time, encampments represent an effort by people who are unhoused to claim their human right to housing and meet their most basic needs for shelter. For reasons discussed in this report, encampments are often people's only housing option, or the only option that meets their needs for safety, security and dignity. Many encampment residents have highlighted the sense of community they experienced when living in an encampment with others facing similar struggles.

Recognizing the severity of this crisis, the Federal Housing Advocate launched a systemic review of encampments in February 2023. This systemic review has been carried out pursuant to subsection 13.1(1) of the National Housing Strategy Act.

In October 2023, the Advocate published an [interim report](#) setting out the context of the crisis and documenting in detail what had been heard through the engagement process. The engagement process consulted directly with people living in encampments, local community advocates, Indigenous governments and representative organizations, and duty-bearers across all governments.

This final report includes the Advocate's conclusions about the factors leading to the rise in encampments and, most importantly, the concrete measures that must be taken by all governments to fulfill their human rights responsibilities in order to reduce or eliminate the need for encampments.

What has emerged is a clear picture of a two-fold human rights crisis.

First, encampment residents are at dire risk of harm due to the failure to uphold their basic rights.

Second, the encampments exist only because of a larger, systemic failure to uphold the right of all people to adequate housing without discrimination.

The engagement process made it clear that Canada has the capacity to solve this crisis. Encampment residents are acutely aware of the measures required to meet their most pressing needs. What is lacking is sufficient political will, resources and coordination.

The absence of effective coordination between the many agencies, departments and jurisdictions involved limits the effectiveness of responses to the homelessness crisis. While municipalities are on the frontlines in responding to encampments, they don't have all the powers and resources they need to provide human rights-based services. Provinces and territories must work closely with municipalities and the federal government must play a leadership role.

This national crisis calls for a national response.

National Encampments Response Plan

The Federal Housing Advocate is recommending that the federal government establish a National Encampments Response plan. The plan must drive urgent change that responds to the Calls to Action developed in this report and addressed to all governments in Canada. The Calls to Action have been developed as the result of extensive consultation with encampment residents, community organizations, and municipalities across the country.

The Federal Housing Advocate calls on the federal government to establish a National Encampments Response plan by August 31, 2024, that will:

- **Act immediately to save lives.**
 - Ensure that everyone living in encampments has access to the basic necessities they need to survive and live in dignity, and to services to protect their physical and mental health.
 - This includes access to clean water, sanitation, food, heating and cooling, accessibility supports, healthcare, and harm reduction.
 - Ensure drop in-shelters are accessible 24/7 throughout the year to provide people with a dignified place to rest, take refuge from the elements and access services.
- **End forced evictions of encampments.**
 - Forced encampment evictions make people more unsafe and expose them to a greater risk of harm and violence. Evictions destabilize people, remove them from their support systems, and cause them to lose the tools and equipment they need to survive.
 - Immediately end forced evictions of encampments, particularly on public lands. Forced evictions are a violation of human rights, as contained in section 7 of the Canadian Charter of Rights and Freedoms, the United Nations Declaration on the Rights of Indigenous Peoples, and the right to adequate housing under international law.
 - Put in place alternatives to removal of encampments that are designed following meaningful engagement with encampment residents to find solutions that meet their needs.
 - All governments must ensure that laws, regulations and bylaws do not further destabilize encampments nor expose residents to greater risk of harm and violence.
 - The role of police and by-law officers should be de-emphasized in responses to encampments. Police, by-law enforcement, and emergency service need clear direction to halt the confiscation of belongings, surveillance and harassment, which violate the human rights of encampment residents. All enforcement measures undertaken must be compliant with human rights standards.
- **Work with all governments and provide support to municipalities.**
 - Immediately convene meetings with provinces, territories, and municipalities to coordinate an all-of-government response.
 - Develop all encampment response measures in consultation and cooperation with First Nations, Inuit, and Métis governments and their representative organizations.
 - Commit the maximum available resources and funding to address this crisis.

- Ensure municipalities have the resources and powers they need to respond to the urgent needs of encampment residents and uphold their human rights.
- Include clear targets and timelines for the National Encampments Response Plan.
- **Respect the inherent rights of Indigenous Peoples.**
 - All governments must commit to upholding the United Nations Declaration on the Rights of Indigenous Peoples and work in consultation and cooperation with First Nations, Inuit and Métis governments to fully implement its provisions. In particular, all governments must work with Indigenous governments to more effectively respond to the distinct needs of urban First Nations, Inuit, and Métis individuals, particularly those who are unhoused and living in encampments.
 - Recognize the jurisdiction of Indigenous governments to determine, develop, and administer programs and services related to housing and homelessness and support First Nations, Inuit and Métis governments and representative organizations to develop and provide self-determined, culturally appropriate housing and related services and supports, including in urban centers in partnership with existing Indigenous service providers.
 - First Nations, Inuit and Métis governments and representative organizations must be fully supported to develop and provide self-determined, culturally appropriate housing and related services and supports, including supports in urban centers.
- **Respect and uphold human rights.**
 - In the absence of adequate, affordable and accessible housing alternatives, all governments must recognize that people have a right to live in encampments.
 - People living in encampments must play a leading role in decision-making processes that affect them. All governments must implement ongoing and meaningful engagement with people living in encampments and those who support them.
 - People living in encampments must have access to timely, effective recourse when their rights are threatened or violated.
 - All governments and political leaders at all levels have obligations to promote and protect the human rights and dignity of people experiencing homelessness. Leaders must refrain from actions and language that further stigmatizes the residents of encampments, or people experiencing homelessness, and exposes them to greater risk of rights violations.
 - All governments must publicly commit to applying a human rights-based approach to encampments that recognizes and addresses the distinct needs of First Nations, Inuit and Métis individuals, Black and other racialized individuals, women, 2SLGBTQI+ individuals, people fleeing gender-based violence, youth, seniors and people with disabilities. These approaches must align with Canada's human rights obligations as affirmed in international human rights instruments, the Charter and domestic law.
- **Offer people permanent housing options as rapidly as possible.**
 - Immediately develop and fund adequate housing solutions and supports so that people living in encampments can be re-housed as rapidly as possible.
 - These housing solutions must meet the definition of adequate housing which includes security of tenure, affordability, accessibility, suitable location, availability of services, habitability and cultural adequacy.

- In the absence of available adequate housing, all governments and service providers must work to address the structural barriers that result in existing emergency shelters not being accessible or appropriate for all people who might choose to use them.
- **Address the root causes of encampments.**
 - Encampments are the symptom of systemic failures – all governments must urgently prioritize investments in adequate housing and support services to prevent and address homelessness. All governments must work together to address the systems that drive homelessness, including systemic racism and discrimination and failings in the Canadian child welfare, corrections, and healthcare systems.
 - The National Housing Strategy must be greatly enhanced and its programs must prioritize the elimination of chronic homelessness and reduction of core housing need, with a focus on Indigenous peoples and disadvantaged groups, to fulfill commitments under the National Housing Strategy Act.
 - All governments must ensure that they are monitoring the progressive realization of the right to adequate housing and put in place measurement systems that include accurate, comprehensive, and replicable data on homelessness.

Next steps

Specific Recommendations are outlined in the report to enable governments at all levels to implement the Calls to Action.

This report's findings and recommendations will be submitted to the federal Minister of Housing, Infrastructure and Communities. The National Housing Strategy Act specifies that when the federal government receives the report of such a systemic review, the Minister responsible for housing must respond within 120 days.

This report is an urgent call to action to governments at all levels to uphold the human rights and the right to housing of encampment residents.

INTRODUCTION

The term “encampments” refers to emergency accommodations established by people who are unhoused, usually on public property or privately-owned land, and often without permission.¹ Encampments are a consequence of Canada’s failure to meet its human rights obligation to ensure that all individuals have access to adequate housing – housing that is secure, affordable, habitable, accessible, culturally appropriate, and in a suitable location with access to services.

While encampments have always been a feature of homelessness in Canada, in the last five years, and particularly since the COVID-19 pandemic, “encampments have become more numerous, more densely populated, and more visible across the country.”² The growth of encampments has been driven by a range of inter-related human rights failures, including the impacts of colonial laws and policies on Indigenous Peoples, systemic discrimination in the housing market, a severe lack of available and affordable housing that has become a deepening national crisis, and barriers to accessing emergency shelters.

There is no systematic data collection on who lives in encampments in Canada. The Observatory on Homelessness at York University has suggested that at least 35,000 individuals are unhoused at any given time across the country.³ One survey of Canadian municipalities estimated that between 20 to 25% of unhoused individuals in Canada now live in encampments.⁴ This is consistent with reports from frontline service providers who talk about thousands of people currently living in encampments across Canada.

It is important to emphasize that while encampments vary from region to region, as do patterns of homelessness, the rise of encampments is a truly national crisis. Encampments are reported in both large and small municipalities, as well as in more rural areas.

Encampments represent an effort by people who are unhoused to claim their human rights and meet their most basic needs. For reasons discussed later in this report, encampments are often the only housing option currently available to many, or the only available option that meets their needs. Living in an encampment may also offer the advantage of living in community with others facing similar struggles.

While recognizing the resourcefulness and collective organizing involved in establishing and maintaining an encampment, it is important to be clear that the conditions in encampments do not represent adequate housing. The Federal Housing Advocate is acutely conscious of the tragic deaths that have

¹ The Advocate has chosen to use the term “encampment” as the language most commonly used, and mostly widely understood in Canadian contexts. The Office recognizes, however, that the term may not reflect everyone’s reality or experience and that it differs from terms commonly used internationally, such as informal settlements.

² Alexandra Flynn et al., *Overview of Encampments Across Canada: A Right to Housing Approach*, The Office of the Federal Housing Advocate (2022). <https://www.homelesshub.ca/resource/overview-encampments-across-canada-right-housing-approach>

³ Homeless Hub, “How many people are homeless in Canada?” <https://www.homelesshub.ca/about-homelessness/homelessness-101/how-many-people-are-homeless-canada>

⁴ Infrastructure Canada, *Homelessness Data Snapshot: Findings from the 2022 National Survey on Homeless Encampments* (November 2023). <https://www.infrastructure.gc.ca/homelessness-sans-abri/reports-rapports/encampments-survey-2022-enquete-campements-eng.html>

occurred in encampments due to cold, fire and drug poisoning – and the likelihood that more deaths will occur even as this report is being written. Furthermore, it is clear the precarious situation of encampments is made much worse when municipalities deny residents access to the essentials of life, including clean water and sanitation, or add to the insecurity of encampment residents through forced relocation and other punitive responses.

Recognizing the severity of this crisis, the Advocate launched a systemic review of encampments in February 2023. As part of this review, the Advocate has engaged with encampment residents and local advocates in communities across Canada. In addition to meetings in Montreal, Saskatoon, Winnipeg, Vancouver, Toronto, and Calgary, the Advocate also launched an online portal to invite individual and organizational submissions to inform this review. Because many people living in encampments would face challenges accessing this tool, the Office partnered with The Shift and local organizations in Victoria, Vancouver, Hamilton, Peel, Ottawa, Gatineau, Montreal, Moncton, and Halifax to support encampment residents using this portal to share their experiences and their proposals for solutions. With the help of these local partners and others, 313 people with lived experience in encampments made submissions. There were also 53 submissions from municipalities, frontline workers, advocates, and other community members.

The Office of the Federal Housing Advocate (OFHA) also worked with the Federation of Canadian Municipalities (FCM), the FCM's Big City Mayors' Caucus, and the Association of Municipalities of Ontario to obtain input from municipalities across the country. Recognizing the significant over-representation of Indigenous individuals living in encampments, the Advocate has also taken part in a number of targeted engagements with First Nations, Inuit and Métis governments and organizations.

What has emerged is a clear picture of a two-fold human rights crisis.

First, encampment residents are at dire risk of harm and the failure to uphold the human rights of encampment residents, including the right to adequate housing and numerous interrelated rights such as the right to life and the right to health, has left them at dire risk of harm.

Second, the encampments exist only because of a larger, systemic failure to uphold the right of all people to adequate housing without discrimination. These rights are protected in international human rights laws, including the International Covenant on Economic, Social, and Cultural Rights and the UN Declaration on the Rights of Indigenous Peoples, which Canada has explicitly committed to uphold to the fullest of its ability.

The engagement process also made it clear that Canada has the capacity to solve this crisis. What is lacking is sufficient political will, resources and coordination.

To be clear, some important advancements have been made. The National Housing Strategy and the 2019 National Housing Strategy Act (NHSA) provide an important, rights-based foundation. The federal government's ten-year National Housing Strategy marks an important return to funding affordable housing programs after decades of absence. Promising practices related to encampments have been put into place by some municipal governments.

Overall, however, the scale of response falls far short of what is required to address this crisis. Furthermore, the evident lack of coordination across jurisdictions remains a barrier to effectively addressing the larger issue of housing and homelessness. The Auditor General's 2022 Report on Chronic Homelessness found that the government was not able to determine whether the National Housing

Strategy's efforts to prevent and reduce chronic homelessness were, in fact, leading to improved outcomes.⁵

People who are unhoused in general, and encampment residents in particular, continue to be stigmatized. Negative perceptions of encampment residents as authors of their own misfortune, or as threats to community safety, impact the political will of governments to recognize and act on their human rights responsibilities. As more than one person commented in our engagement process, Canada has a long history of mobilizing resources to rapidly rehouse people on a mass scale in wake of natural disasters. The failure to respond to the encampments crisis is a telling illustration of attitudes toward people who are unhoused.

In this context, it is crucial to acknowledge that Indigenous persons are much more likely to experience homelessness. For example, in Edmonton, it has been reported that approximately 60 percent of people experiencing homelessness identify as First Nations, Inuit, or Métis.⁶

Overall, the risk of experiencing homelessness, and the needs of unhoused persons, are impacted by intersecting, and compounding experiences of systemic discrimination. This includes racism directed against Indigenous persons, Black Canadians, and members of other racialized communities, as well as gender-based discrimination that particularly impacts women, member of 2SLGBTQIA+ communities, and discrimination against persons with disabilities.

In October 2023, the Advocate published an [interim report](#) setting out in detail what had been heard through the engagement process. This final report focuses on the Advocate's conclusions about the factors leading to the rise in encampments and, most importantly, the concrete measures that must be taken by all governments to fulfill their human rights responsibilities to reduce or eliminate the need for encampments.

The Advocate has identified the need for an urgent national response that leverages the resources and powers of all governments. The role of the federal and provincial and territorial governments is particularly important given that municipalities are on the frontlines in responding to the crisis, but they do not have the resources or powers to address the scale or complexity of the issues.

This systemic review has been carried out pursuant to subsection 13.1(1) of the National Housing Strategy Act. The Act specifies that the when the federal government receives the report of such a systemic review, the Minister of Housing, Infrastructure and Communities must respond in writing within 120 days.

⁵ Office of the Auditor General of Canada, *Report 5 – Chronic Homelessness* (2022). https://www.oag-bvg.gc.ca/internet/english/parl_oag_202211_05_e_44151.html (accessed August 31, 2023).

⁶ Letter from Edmonton Mayor Amarjeet Sohi.

THE HUMAN RIGHTS FRAMEWORK

The right to adequate housing

The human right to adequate housing, and interconnected rights such as the right to life, are clearly established in international human rights law, including in treaties that Canada has signed and ratified as well as in human rights declarations and other international norms and standards.⁷ With the NHSA enacted in 2019, the human right to adequate housing is now also explicitly enshrined in domestic law.⁸

Recognizing the human right to adequate housing means that governments have legal obligations to recognize and respect this right, protect against its violation, take positive measures and mobilize maximum available resources to ensure that everyone can enjoy this right without discrimination, and promote broad public awareness and understanding of the right. These obligations are heightened in respect to those who have experienced prior human rights violations and who are at heightened risk of further violations.

As it has been interpreted in the international human rights system, adequate housing is housing that is:

- secure,
- affordable,
- habitable,
- accessible,
- culturally adequate,
- in a suitable location, and
- able to ensure access to basic services.⁹

All people should have equitable access to adequate housing, without discrimination based on gender, race, disability, faith, place of birth, age, sexual orientation, or other grounds.

⁷ Universal Declaration of Human Rights, 10 December 1948, UN Doc. A/810, art. 25; International Covenant on Economic, Social and Cultural Rights, 16 December 1966, UN Doc. A/6316, 993 UNTS 3 (entered into force 3 January 1976; accession by Canada 19 May 1976), art. 11(1) [ICESCR]; International Covenant on Civil and Political Rights, 16 December 1966, UN Doc. A/6316 (entered into force 23 March 1976; accession by Canada 19 May 1976), [ICCPR]; International Convention on the Elimination of All Forms of Racial Discrimination, 21 December 1965, 660 UNTS 195 (entered into force 4 Jan. 1969, accession by Canada 14 Oct. 1970), art. 5(e)(iii) [ICERD]; Convention on the Elimination of All Forms of Discrimination against Women, 21 December 1965, 1249 UNTS 14 (entered into force 3 Sept. 1981; accession by Canada 10 Dec. 1981), art. 14(2) [CEDAW]; Convention on the Rights of the Child, 20 November 1989, 1577 UNTS 3 (entered into force 2 September, 1990, accession by Canada 13 Dec. 1991), art. 27(1) [CRC]; Convention on the Rights of Persons with Disabilities, 13 Dec. 2006, (entered into force 3 May 2008, accession by Canada 11 March 2010), arts. 9 and 28 [CRPD]. See also article 10 of the Declaration on Social Progress and Development, section III (8) of the Vancouver Declaration on Human Settlements, article 8 (1) of the Declaration on the Right to Development, and the ILO Recommendation Concerning Workers' Housing, 1961 (No. 115)). Further, UN Committee on Economic, Social and Cultural Rights (CESCR), General Comment No. 4, The Right to Adequate Housing, U.N. Doc. E/1992/23 (1991).

⁸ See, National Housing Strategy Act, S.C. 2019, c. 29, s. 313 [NHSA].

⁹ Office of the UN High Commissioner for Human Rights and UN Habitat, *The Right to Adequate Housing, Fact Sheet 21* (2014). https://www.ohchr.org/sites/default/files/Documents/Publications/FS21_rev_1_Housing_en.pdf (accessed August 1, 2023).

Failure to uphold the right to adequate housing has harmful consequences for the enjoyment of other human rights. Former United Nations Special Rapporteur on the right to adequate housing, Leilani Farha, explained:

Homelessness is a profound assault on dignity, social inclusion and the right to life. It... violates a number of other human rights in addition to the right to life, including non-discrimination, health, water and sanitation, security of the person and freedom from cruel, degrading and inhuman treatment.¹⁰

International human rights standards require states to make every effort, and to use all available resources to eliminate homelessness in the shortest possible period of time.¹¹ Specific human rights obligations include requirements to:

- In consultation with people who are unhoused, adopt and implement action plans to eliminate homelessness that must include clear, time-bound goals, and clear delineation of responsibilities across all levels of government.
- Measure and monitor the extent of homelessness using data disaggregated by gender, race, disability and other relevant characteristics;
- Combat discrimination, stigma, and negative stereotyping of people who are unhoused;
- Ensure access to justice for rights violations, including government failures to take adequate measures to address homelessness; and
- Regulate non-state actors such as private corporations so that they respect the rights of people who are unhoused and undertake actions consistent with the imperative to eliminate homelessness.¹²

The prohibition of forced evictions

International human rights standards prohibit measures that would arbitrarily and unnecessarily deprive individuals of housing, including temporary or informal shelter such as encampments. The prohibition of forced evictions requires that individuals and communities be relocated only after adequate consultation. Relocation without consent is limited to exceptional circumstances. When individuals or communities do not wish to be relocated, there is an obligation for the state to demonstrate that the relocation is strictly necessary and that all other alternatives have been explored. In all instances, any relocation must be consistent with the right to adequate housing: alternative shelter must be provided

¹⁰ Leilani Farha, Guidelines for the Implementation of the Right to Adequate Housing: Report of the Special Rapporteur on adequate housing as a component of the right to an adequate standard of living, and on the right to non-discrimination in this context, UN Doc. A/HRC/43/43, UN Human Rights Council (2019), para. 30 [Guidelines for the Implementation of the Right to Adequate Housing].

¹¹ Committee on Economic, Social, and Cultural Rights, General Comment No. 3 on the nature of States parties' obligations, UN Doc. E/1991/23 (1990), paras. 10 and 12.

¹² Leilani Farha, Guidelines for the Implementation of the Right to Adequate Housing, para. 32; Leilani Farha, Report of the Special Rapporteur on adequate housing as a component of the right to an adequate standard of living, and on the right to non-discrimination in this context, UN Doc. A/HRC/31/54, UN Human Rights Council (2015), paras. 49, 73, and 90; Committee on Economic, Social, and Cultural Rights, General Comment No. 20 on non-discrimination in economic, social and cultural rights, UN Doc. E/C.12/GC/20 (2009), para. 35, and Human Rights Committee, General Comment No. 36 on the right to life, UN Doc. CCPR/C/GC/35 (2018), para. 61.

that is secure, habitable, culturally appropriate, in a suitable location and where access to essential supports and services can be maintained.¹³

The right to adequate housing and the human rights of Indigenous Peoples

The United Nations Declaration on the Rights of Indigenous Peoples is also particularly important given the disproportionate number of Indigenous individuals living in encampments. The Declaration affirms a wide range of interconnected rights of Indigenous individuals and Peoples relevant to the right to adequate housing. These include the right of Indigenous Peoples to determine and control provision of social services such as housing, the right of Indigenous Peoples to maintain their relationship to, and use of, their traditional territories for livelihoods, subsistence and ceremony; the obligation of states to work in cooperation and consultation with Indigenous Peoples' chosen representatives, the right not to be forcibly removed from their lands or territories, and the duty of states to support Indigenous Peoples in the exercise of their right to self-determination. In July 2021, Canada passed national legislation to implement the UN Declaration which requires the federal government to "take all measures necessary to ensure that the laws of Canada are consistent with the Declaration."¹⁴ These obligations are particularly significant given the greatly disproportionate number of Indigenous persons living in encampments.

The right to life

Finally, the United Nations Human Rights Committee underscores that States should take particular measures to uphold the right to life, including actions related to housing:

The duty to protect life also implies that States parties should take appropriate measures to address the general conditions in society that may give rise to direct threats to life or prevent individuals from enjoying their right to life with dignity. These general conditions may include [...] extensive substance abuse, widespread hunger and malnutrition and extreme poverty and homelessness. The measures called for to address adequate conditions for protecting the right to life include, where necessary, measures designed to ensure access without delay by individuals to essential goods and services such as food, water, shelter, health care, electricity and sanitation, and other measures designed to promote and facilitate adequate general conditions, such as the bolstering of effective emergency health services [...] and social housing programmes.¹⁵

¹³ Committee on Economic, Social and Cultural Rights, General Comment No. 7: The Right to Adequate Housing: Forced Evictions, UN Doc. E/1998/22, annex IV (1997) and Leilani Farha, Guidelines for the Implementation of the Right to Adequate Housing: Report of the Special Rapporteur on adequate housing as a component of the right to an adequate standard of living, and on the right to non-discrimination in this context, UN Doc. A/HRC/43/43, UN Human Rights Council (2019), "Guideline No. 6. Prohibit forced evictions and prevent evictions whenever possible" [Guidelines for the Implementation of the Right to Adequate Housing].

¹⁴ SC 2021, c 14. Royal Assent, 21 June 2021.

¹⁵ Human Rights Committee, General Comment No. 36 on the right to life, UN Doc. CCPR/C/GC/35 (2018), para. 26

A LIFE AND DEATH CRISIS

Encampments arise as a direct consequence of Canada’s persistent failure to protect and fulfill the right to adequate housing. Until encampment residents can access adequate housing options that meet their needs, urgent measures must be taken to protect their human rights and reduce the precariousness of their current living conditions.

It is important to acknowledge that the encampments crisis is taking place in the context of a national opioid crisis and the greatly heightened risks created by an unsafe drug supply. A review panel convened by the British Columbia Coroner’s Office recently reported that between April 2016, when the province first recognized the opioid crisis as a public health emergency, and September 30, 2023, “at least 13,000 lives have been lost to toxic, unregulated drugs in British Columbia.”¹⁶ For reasons set out below, the risks created by an unsafe drug supply and the unaddressed mental health and addictions needs, compound the dangers faced by many encampment residents.

Forced evictions

Forced encampment evictions make people more unsafe and expose them to a greater risk of harm and violence. Evictions destabilize people, remove them from their support systems, and cause them to lose the tools and equipment they need to survive.

As was detailed in the interim report, the Advocate has repeatedly heard about municipal enforcement actions that have made the lives of encampment residents much more precarious. There have been numerous incidents of encampments forcibly closed down by municipal officials without provision of adequate housing to address the safety and well-being of the residents. In addition to full-scale evictions, there have been widespread incidents of municipal officials tearing down tents and seizing individual property, including personal identification, photo albums, money, and clothing.

Actions to restrict or relocate encampments are often taken in the name of safety and public security. However, the failure to consult encampment residents, protect their belongings, and provide adequate and acceptable alternative housing has the direct consequence of increasing risks to their health and safety.

In an investigation of forced evictions of encampment in Toronto, the city ombudsperson found that the municipality “[c]hose to clear encampments quickly, instead of focusing on the needs of the people living in them.”¹⁷ In doing so, the report concluded, “the city caused undue confusion and harm.”¹⁸

¹⁶ British Columbia Coroners Service, *BC Coroners Service Death Review Panel: An Urgent Response to a Continuing Crisis* (1 November 2023). https://www2.gov.bc.ca/assets/gov/birth-adoption-death-marriage-and-divorce/deaths/coroners-service/death-review-panel/an_urgent_response_to_a_continuing_crisis_report.pdf

¹⁷ Ombudsman Toronto, “Toronto’s Ombudsman says City Chose Speed over People in Clearing Encampments,” (24 March 2023). <https://www.ombudsmantoronto.ca/news/torontos-ombudsman-says-city-chose-speed-over-people-in-clearing-encampments/> (accessed August 31, 2023).

¹⁸ Ombudsman Toronto, *Ombudsman Toronto Investigation Report: Investigation into the City’s clearing of Encampments in 2021* (24 March 2023), p. 2. <https://www.ombudsmantoronto.ca/investigative-report/investigation-into-the-citys-clearing-of-encampments-in-summer-2021/> (accessed August 31, 2023).

Encampment residents, and advocates who work closely with them, point out that established encampments have informal systems through which residents look out for each other. In other words, they are a community with a kind of safety net of their own. Forced evictions disrupt these communities and the benefits they provide.

Forced evictions are also inherently violent. Residents experience their rights being disregarded and trampled on. Outreach workers told the OFHA that police involvement in forced evictions can invoke a trauma response in many people who are or have been experiencing homelessness. The Toronto Alliance to End Homelessness told the OFHA:

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.

For unhoused Indigenous persons, the trauma of encampment clearings is often added to previous traumas, including the forced removal of children from their families and communities. Indigenous organizations and frontline workers said that police involvement in the housing crisis is a continuation of colonial state violence and is deeply inappropriate.

Unmet basic needs and a lack of essential supports

Most encampments lack necessities such as clean water, bathrooms, a place to shower, or secure storage for belongings. Tents and tarpaulins that are not meant for winter use, inadequate clothing and blankets, no electricity or access to heating and cooling, lack of first aid supplies and fire extinguishers, no provision for garbage removal, and no place for safe needle disposal create significant risks to the safety and well-being of residents.

The OFHA has received reports of how conditions in encampments add to mental health challenges and may worsen chronic physical conditions such as back injuries. There are also demonstrated risks of injury and even death from exposure in winter and heat exhaustion in summer.

The failure of many municipalities to provide for the basic needs of encampment residents led to individuals and community groups stepping in with donations of tents, sleeping bags, clothing or food. However, there have also been accounts of some municipalities interfering with the delivery of such basic amenities in a misguided attempt to force encampments to disband.

In many communities that allow overnight camping in public spaces, people experiencing homelessness must pack up their belongings early every morning until they can set up their shelter again in the evening. People who are already exhausted, and who may be in ill-health, are forced to carry all their possessions with them, or risk their loss. Encampment residents describe how carrying large packs or bags means that they are more likely to be refused entry to spaces where they might rest or access washrooms. By-laws establishing these rules ignore the needs of people for rest and privacy during the day and also represent an attack on their basic dignity.

Housing is a social determinant of health and it comes as no surprise that encampment residents have a wide range of health and wellness needs, some of which are linked to their challenges in finding and maintaining long-term secure housing. These needs include treatment for chronic illness and counselling for mental health and addictions issues.

Encampment residents who cannot securely store their belongings are severely limited in how far they are able to travel to access services. The situation is compounded by an overall shortage of community-based supports, the challenge of navigating a complex service system, and the fact that many encampments have been pushed into isolated locations.

There is an additional concern about the scarcity of culturally appropriate resources for unhoused Indigenous persons. An Elder told the Advocate about the lack of Indigenous crisis workers able to provide culturally appropriate assistance to encampment residents.

Responding to safety and security concerns

During this review, the Advocate heard about violent incidents in encampments such as robberies, sexual violence, beatings, harassment, and sexual exploitation. Violence, exploitation and coercion within encampments is a particular concern for women, youth, gender-diverse people, persons with disabilities, and persons experiencing multiple forms of systemic discrimination. The Advocate also heard that incidents of violence in encampments are treated differently. For example, all the tenants of an apartment building are not evicted when an incident of violence is reported.¹⁹

It should be noted however, that violence, including gender-based violence, disproportionately impacts all people experiencing homelessness, including people using shelters, and is not necessarily a greater risk for those living in encampments. In fact, many encampment residents expressed greater fear about being alone on the streets or in certain temporary housing situations, such as shelters and single room occupancy units. Many expressed that they see encampments as a place that provides community, support, and safety for most of the people living there.

The stigmatization of encampments, and the reasonable fear that police and other authorities may tear down the encampment, may discourage residents seeking the protection of law enforcement. One community organizer stated that the constant threat of displacement, and lack of reliable access to food and water, increases stress, exacerbates mental health issues, and can lead to a rise in violent incidents.

People living in encampments face life and death risks throughout the year, but in the winter months, these risks are heightened dramatically. Efforts to stay warm without access to appropriate shelter, clothing, and heat sources greatly increases the risk of fire. This risk is often cited as a reason to forcibly remove encampments. However, as noted earlier, removal from one site, without provision of adequate alternatives, only causes further disruption and harm to the lives of encampment residents while doing little or nothing to reduce the risks they face. In fact, if encampments are pushed to more isolated locations, the risks may be further increased.

A human rights-based response to the risk of fire would include mitigation measures, including provision of more weather resistant forms of temporary shelter, safe sources of heat, and access to fire extinguishers, along with fire safety training. Above all else, public officials should be meeting regularly with encampment residents so that residents can identify their own safety needs and the best ways to address them.

¹⁹ [If governments don't provide adequate housing, they must allow people to shelter in public spaces" by Kasari Govender, Vancouver Sun, September 14, 2023 \(accessed January 24, 2024\)](#)

HOW WE GOT HERE

A national housing crisis

A recent study commissioned by the Office of the Federal Housing Advocate calculates that Canada has a total shortage of 4.3 million homes affordable to very low- and low-income households.²⁰ In some locations, there is now a ten-year waitlist for rent-geared-to-income housing. During this review, one community worker said simply: “There is no housing to offer people.”

The severe housing shortfall, and the soaring cost of rental accommodations, have also meant that there are only very limited options available to very low-income households. The Advocate heard that many of these apartments have no running water or extreme infestations of rodents, and bedbugs. Some encampment residents said they would rather live outside than try to live in the uninhabitable housing options that are available to them.

The Advocate also heard that the housing crisis is compounded by the discrimination facing members of Indigenous Peoples, racialized communities, people with disabilities, youth, 2SLGBTQQIA+ individuals and others. There is also a severe lack of supportive housing that meets the specific needs of people with mental health challenges including active and severe addictions. Alongside a limited supply of detox and rehab programs, there are not enough housing options for people leaving those programs.

The limited housing available to low and very low-income individuals is often highly insecure. There are widespread reports of people being evicted by landlords wanting to upgrade units to a higher rent.

Challenges with emergency shelters

There is a clear link between the growing encampments and inaccessibility of the emergency shelter system. Shelters are intended as an emergency measure before being rehoused. They fall far short of meeting government obligations to fulfill the right to adequate housing.

The surge in the number and size of encampments was initially linked to the decreased capacity of shelters during the early phase of the COVID-19 pandemic. However, the challenges have proven to be more persistent and systemic.

Firstly, there is an overall shortage of available shelter space. Frontline workers describe a crisis in which individuals are being routinely turned away because there is no available space.

Secondly, there are also significant concerns about living conditions in the overcrowded and overstrained shelter system. “Shelters are dead spaces,” according to one participant in the review, noting that conditions like theft, crowding, violence, and the threat of catching illnesses encourage people to opt to live in encampments.²¹

Thirdly, emergency shelters are not available, or safe and suitable, for all. During the review, encampment residents and advocates indicated that some women and gender-diverse people reside in

²⁰ Carolyn Whitzman, *A Human Rights-Based Calculation of Canada’s Housing Supply Shortages*, The Office of the Federal Housing Advocate (2023). https://www.homelesshub.ca/sites/default/files/attachments/Whitzman-Human_Rights_Based_Supply_Report-EN_1.pdf

²¹ Encampments Roundtable – Toronto – June 1, 2023.

encampments because there are no gender-specific shelters in their community. Data shows that the vast majority of shelter beds in Canada are either designated for men or are co-ed (68 percent), with only 13 percent dedicated specifically for women.²²

Furthermore, most shelters in the violence against women or homelessness systems have physical barriers for people with disabilities. They also lack appropriate and accessible spaces for persons with mental health, sensory and environmental disabilities.

As noted earlier, people living unhoused face a disproportionately high risk of violence. Many women have experienced harassment or violence in co-ed and congregate shelters. These concerns are particularly acute for many trans women. Roundtable participants lamented the lack of emergency resources specifically for women and 2SLGBTQIA+ people.

Emergency shelters often have rules that restrict personal autonomy, freedom of movement, privacy, and access to friends and family. They may also set expectations that are difficult to meet for people who have been living on the street. For example, shelters may require sobriety, impose disruptive bed checks, restrict the quantity of belongings residents can bring, or not provide space for pets. The Advocate repeatedly heard concern over policies that prevent couples from staying or sleeping together. Numerous participants compared shelters to prison-like conditions. Faith-based shelters can also raise legitimate concerns for some who have had negative experiences with religious institutions. The restrictive environment can have a triggering effect, depending on the individual's mental health and prior experiences of trauma.

Shelters designed for women fleeing violence may also impose restrictive admission criteria. One assessment estimates that approximately 699 women and 236 accompanying children are turned away from domestic violence shelters every day across Canada.²³

People who use drugs are also particularly affected by shelter restrictions. The Pan Canadian Women's and Housing and Homelessness Survey demonstrates that people who use drugs were banned from shelters at a rate three times greater than those who did not use drugs.²⁴

Indigenous Peoples and the homelessness crisis

Indigenous persons are greatly overrepresented among people experiencing homelessness. A recent national study found that 35 percent of unhoused respondents identify as Indigenous compared to the 5 percent of the overall population that identified as Indigenous in the 2021 census.²⁵

²² Kaitlin Schwan et al., *A Rights-Based, GBA+ Analysis of the National Housing Strategy*, Office of the Federal Housing Advocate (2021), p. 11. <https://womenshomelessness.ca/wp-content/uploads/EN-Rights-Based-GBA-Analysis-of-NHS-28-Sept-2021.pdf> (accessed August 30, 2023).

²³ Kaitlin Schwan et al., *The Crisis Ends with Us: Request for a Review into the Systemic Denial of the Equal Right to Housing of Women and Gender-Diverse People in Canada*, Women's National Housing & Homelessness Network (2022). <https://womenshomelessness.ca/wp-content/uploads/WNHHN-Claim-15-June-2022.pdf> (accessed August 31, 2023).

²⁴ Kaitlin Schwan et al., *Pan Canadian Women's and Housing and Homelessness Survey*, Canadian Observatory on Homelessness (2021). <https://womenshomelessness.ca/wp-content/uploads/EN-Pan-Canadian-Womens-Housing-Homelessness-Survey-FINAL-28-Sept-2021.pdf> (accessed August 30, 2023).

²⁵ Infrastructure Canada, *Everyone Counts 2020-2022: Preliminary Highlights Report* (April 2023). <https://www.infrastructure.gc.ca/homelessness-sans-abri/reports-rapports/pit-counts-dp-2020-2022-highlights-eng.html#h2.5.4> (accessed August 31, 2023).

High rates of Indigenous homelessness are linked, in large part, to inter-generational harms caused by Canada's colonial laws and policies and the longstanding lack of equitable federal investment in housing and related infrastructure in First Nations, Inuit, Métis communities. While Indigenous communities face a severe housing crisis, there is also a critical lack of resources and supports for Indigenous individuals living in urban centres away from their home territories, which increases the risks of homelessness. Gaps in services and supports include a lack of transition services for those moving from reserves and remote to communities to urban centres, a lack of culturally appropriate housing, and the limited number of urban Indigenous housing providers.

The full scale of housing needs for Indigenous persons is uncertain, however, because of the prevalence of hidden Indigenous homelessness. Rather than living unsheltered, it is common for unhoused Indigenous individuals to live in overcrowded family homes, couch surf, or live out of cars and hunting shacks, particularly in Northern, rural, and remote locations.

There are also significant gaps in available data. Failure to separately track the experience of First Nations, Inuit, Métis individuals means that their distinct needs are often overlooked.

It has been reported that in Western Canada the majority of encampment residents in many communities are Indigenous.

Indigenous governments and service providers face significant jurisdictional barriers in meeting the needs of their communities. At the same time, First Nations, Inuit and Métis governments are not resourced to support Indigenous people living away from their home territories and their jurisdiction to provide such support may not be recognized. A representative of an Indigenous organization observed that third party, non-Indigenous entities are receiving funding to provide services to urban Indigenous people but are not delivering culturally appropriate care and services.

Inadequate program funding for community services

Frontline services are underfunded, operating over capacity, and facing high rates of staff turnover and burnout. Reliance on project-based and short-term funding – the model used by the federal Reaching Home program – is a barrier to long-term planning and ties up staffing in managing administration and reporting requirements. By the time someone is hired and trained, one person noted, the funding for the position is gone, which leads to instability for staff, and precludes being able to build trust with clients, many of whom have complex needs. The result, some noted, is that vulnerable and neglected people are being underserved, and not receiving the qualified, trauma-informed care to which they are entitled.

Furthermore, limited funding results in “unproductive competition” between organizations as they fight for the same funding opportunities. This competition can lead groups to under report their real financial needs when submitting applications, which makes it difficult to maintain projects, even if they are successful in meeting needs.

Mental health and addictions support

Without proper housing supports in place, mental health and addictions can create significant barriers to finding and maintaining housing. At the same time, the circumstances of living unhoused or in precarious housing can greatly add to mental health or addictions challenges.

During the review, encampment residents and advocates consistently drew attention to the inadequacy of resources for people living with mental health and addictions challenges, and the difficulty accessing

the supports that do exist. Municipalities and frontline service providers emphasized the need for greater integration and coordination between housing and homelessness services and mental health and addictions support. In particular, many called for the creation of integrated response teams available to support individuals living in encampments.

A critical issue is access to a safe, regulated drug supply. Reliance on unregulated, criminalized supplies exposes people using drugs to increased incidents of violence and coercion, as well as a much greater risk of overdose or other harm from adulterated or “poisoned” drugs.

Many communities lack harm reduction services, or the services are limited or otherwise inaccessible to encampment residents. Encampment residents described a lack of access to specialized care or treatment, clean needle distribution programs, safe consumption sites, and naloxone.

Lack of coordination and accountability

Efforts to address homelessness have been stymied by lack of clear coordination and accountability across government ministries and between various levels of government. “Everyone keeps acting like it’s not their responsibility and trying to pass the issue on to another government entity. They need to just come together and resolve this issue,” one person told the Office.²⁶

The absence of effective coordination between the many agencies, departments and jurisdictions involved limits the effectiveness of responses to the homelessness crisis. For example, the two issues of affordable, accessible housing and mental health and addictions support are directly linked in practice, but fall under the purview of different, unconnected federal, provincial and territorial programs and agencies, without any established structure of coordination.

Critical areas of integration and coordination include income supports, housing allowances, access to health care, and policies and practices related to public safety. All such services should be developed and assessed on the basis of compliance with Canada’s human rights obligations and a gender-based analysis plus (GBA+) of the differential impacts on Indigenous Peoples, racialized communities, people of diverse genders, youth, and people living with disabilities. While municipalities are on the frontlines in responding to encampments, they don’t have all the powers and resources they need to provide human rights-based services. Provinces and territories must work closely with municipalities and the federal government must play a leadership role.

EMPHASIZING DIGNITY AND RESPECT

All responses to the encampments crisis must respect the inherent dignity and rights of encampment residents. The stigmatization of encampments, and homelessness more generally, fuels enforcement-based responses that do nothing to alleviate the crisis, and only add to the marginalization and precariousness of life for unhoused people. This stigmatization also masks the systemic causes of the crises and obscures the accomplishments made by encampment residents in asserting their rights and meeting their own basic needs.

²⁶ Encampments Roundtable – Calgary – August 8, 2023.

Meaningful engagement

Any human rights-based response must begin by engaging with encampment residents, respecting their ability – and their right – to make decisions for themselves. It is also important to recognize that they have valuable knowledge and insights as a result of their lived experiences of homelessness or in encampments. Many encampment residents are distrustful of authorities, often based on a history of negative interactions. It is vital that anyone engaging with encampment residents build a relationship of trust. This requires experience in cultural safety and trauma informed approaches. Police and emergency services should not be the primary point of contact between governments and encampments.

In many encampments, informal structures have emerged that help organize the space and make it safer for residents. These informal structures should be the starting point for any engagement. To the extent that it is welcomed, such structures should be supported and strengthened.

There is a wealth of guidance available to assist in respectful, trauma-informed and culturally appropriate engagement with encampments. In particular, the OFHA encourages application of the [National Protocol on Homeless Encampments in Canada](#), authored by former United Nations Special Rapporteur on the Right to Adequate Housing Leilani Farha and Dr. Kaitlin Schwan and published by The Shift. The Canadian Lived Experience Leadership Network also presented key principles at the Canadian Alliance to End Homelessness' National Conference on Ending Homelessness in November 2023. Drawing on these and other sources, the Advocate recommends the following key measures for meaningful, transparent, and accountable engagement:

- Engagement should be managed through people trusted by encampments residents.
- Wherever possible, people with lived experience of homelessness and housing insecurity should be employed as leaders and contact points in the process.
- Value the time of people taking part in the engagement process, including by providing stipends to compensate for their time; provide food and beverages at meeting; provide transportation as needed; and ensure meeting spaces are culturally safe.
- Ensure that there is enough time for meaningful engagement, including the time needed to build trust and good communication.
- Respect Indigenous protocols and decision-making processes.
- Any community consultation processes must take into account the tremendous power imbalances between encampments and their housed neighbours.
- Avoid unnecessary turnover of staff involved or too many people being involved.
- Make clear commitments to effective monitoring and follow up.
- Ensure that all aspects of an engagement process are documented and that these documents are publicly available.

THE URGENT NECESSITY OF FEDERAL LEADERSHIP

Effective responses to encampments require both mobilization of significant financial resources and effective coordination of a complex web of departments, agencies and programs among federal, provincial, territorial and municipal governments as well as Indigenous Peoples and their representative institutions. Federal leadership is critical.

The federal government has unique responsibilities to ensure Canada lives up to its international human rights obligations. This includes specific obligations toward Indigenous Peoples and their rights affirmed in Treaties, international law more generally and in the Canadian Constitution.

Federal leadership is necessary to recognize the urgency of this national human rights crisis affecting large, medium and smaller communities across the country. Federal leadership is also necessary to confront the stigmatization and discrimination faced by people living in encampments. The federal government is in a position to model appropriate and effective responses.

The federal government is also uniquely positioned and has the spending powers to bring about comprehensive and coordinated responses required to address housing, income supports, physical and mental health, and public safety in every region of the country. The National Housing Strategy, the 2019 National Housing Strategy Act, and the 2021 UN Declaration on the Rights of Indigenous Peoples Act provide a foundation for responding to this crisis on the basis of internationally recognized human rights principles and obligations. The federal government has the capacity to convene the national coordination and planning processes needed to resolve jurisdictional barriers and confusion. Through its transfer agreements with the provinces and territories, it has also the means to ensure provinces, territories and municipalities have human rights-compliant standards to address the needs of people living in encampments.

CALLS TO ACTION

In response to the urgency of the current crisis – including the life and death risks faced by the growing number of people now living in encampments – the Federal Housing Advocate is issuing the following Calls to Action addressed to all governments in Canada.

It is the Advocate’s hope that the Calls to Action will also be useful to service providers, other civil society organizations, and the public as a whole. Public awareness of the need for urgent action should drive governments to uphold their responsibilities to protect and fulfil the human right to housing.

The Calls to Action provide a high-level road map to guide the actions need to respond to homeless encampments in compliance with Canada’s human rights obligations, including those affirmed in the Canadian Charter of Rights and Freedoms, the Canadian Constitution, the National Housing Strategy Act, the International Covenant on Economic, Social, and Cultural Rights, and the UN Declaration on the Rights of Indigenous Peoples.

The Calls to Action are followed by a set of specific, actionable recommended measures that federal, provincial, territorial and municipal governments must each take to implement the Calls to Action.

1. The Federal Government must lead the development of a human rights-based National Encampments Response Plan in cooperation and consultation with all other governments.

- a. Immediately convene meetings with provinces, territories, and municipalities to coordinate an all-of-government response.
- b. Commit maximum available resources to promote, protect and fulfill the human rights of encampment residents.
- c. Provide a coordinated all-of-government response and ensure resources are available to address the range of housing, healthcare, income and other supports needed by people experiencing homelessness using human rights-based approaches.
- d. Include clear targets and timelines.

2. Commit to a human rights-based approach to address the needs of encampment residents.

- a. All governments must publicly commit to applying a human rights-based approach to encampments that recognizes and addresses the distinct needs of First Nations, Inuit and Métis individuals, Black and other racialized individuals, women, 2SLGBTQQIA+ individuals, people fleeing gender-based violence, youth, seniors and people with disabilities. These approaches must align with Canada’s human rights obligations as affirmed in international human rights instruments, the Charter, and domestic legislation.
- b. In the absence of adequate, affordable and accessible alternatives, all governments must recognize the rights of people to live in encampments. Supporting the dignity and autonomy of the person means governments must respect the rights of encampment residents to decide for

themselves if shelter solutions best meet their needs, including for safety and security.

- c. People living in encampments must play a leading role in decision-making processes that affect them. All governments must implement ongoing and meaningful engagement with people living in encampments and those who support them.
- d. All governments and political leaders at all levels have obligations to promote and protect the human rights and dignity of people experiencing homelessness. Leaders must refrain from actions and language that further stigmatizes the residents of encampments, or people experiencing homelessness, which exposes them to greater risk of rights violations.

3. Respect the inherent rights of Indigenous Peoples.

- a. All governments must commit to upholding the United Nations Declaration on the Rights of Indigenous Peoples and work in consultation and cooperation with First Nations, Inuit, and Métis governments to fully implement its provisions.
- b. Federal, provincial, territorial, and municipal governments must recognize the jurisdiction of Indigenous governments to determine, develop, and administer programs and services related to housing and homelessness. Such recognition must not result in any reduction in levels of funding or other supports provided by federal, provincial, territorial and municipal governments.
- c. Develop all encampment response measures in consultation and cooperation with First Nations, Inuit, and Métis governments and their representative organizations.
- d. First Nations, Inuit and Métis governments and representative organizations must be fully supported to develop and provide self-determined, culturally appropriate housing and related services and supports, including supports in urban centers.
- e. All government departments and agencies engaged in the design and delivery of housing-related services should make a concerted effort to ensure their staff, management and boards are representative of First Nations, Inuit and Métis people, and introduce mandatory cultural safety training.

4. Take immediate action to protect the right to life and dignity of all people living in encampments, reduce the risks that they face, and help them to stabilize their situation.

- a. Immediately end forced evictions of encampments, particularly on public lands, as a violation of human rights protected by section 7 of the Charter as well as the right to life and the right to adequate housing under international law. Put in place alternatives to evictions that are designed following meaningful engagement with encampment residents to find solutions that meet their needs.
- b. All governments must ensure that laws, regulations and bylaws do not further destabilize encampments and expose residents to greater risk of harm and violence. All enforcement measures undertaken must be compliant with human rights standards.

- c. All governments must fulfill their human rights responsibilities to ensure that everyone living in encampments has access without discrimination to the necessities of life and the services needed to protect their physical and mental health, including access to water, food, sanitation, and heating and cooling, accessibility supports, healthcare and harm reduction services.
- d. Ensure drop-in shelters are accessible 24/7 throughout the year to provide people with a dignified place to rest, take refuge from the elements and access services.

5. Implement immediate measures to address the root causes of encampments and provide access to adequate housing.

- a. All governments must immediately fund and/or develop adequate housing solutions and supports so that people living in encampments are re-housed as rapidly as possible. These housing solutions must meet the definition of adequate housing which includes security of tenure, affordability, accessibility, suitable location, availability of services, habitability and cultural adequacy.
- b. In the absence of available adequate housing, all governments and service providers must work to address the structural barriers that result in existing emergency shelters not being accessible or appropriate for all people who might choose to use them.
- c. The National Housing Strategy must be greatly enhanced and its programs must prioritize the elimination of chronic homelessness and reduction of core housing need, with a focus on Indigenous peoples and disadvantaged groups, to fulfill commitments under the NHSA.
- d. All governments must strengthen collaboration to address the systems that drive homelessness, including systemic racism and discrimination and failings in the Canadian child welfare, corrections, healthcare, income security and other systems.

6. Ensure government accountability and that people experiencing homelessness have access to justice.

- a. All governments must ensure that they are monitoring the progressive realization of the right to adequate housing and put in place measurement systems that include accurate, comprehensive, and replicable data on homelessness.
- b. People living in encampments must have access to timely, effective recourse when their rights are threatened or violated.

DETAILED RECOMMENDATIONS TO IMPLEMENT THE CALLS TO ACTION

The following recommendations set out essential measures for all governments to put the Calls to Action into practice, with emphasis on the measures that must be taken immediately to address the urgent risks facing encampment residents. It is essential that all measures be adapted to the specific needs of each community, taking into account that needs in rural, remote and northern communities will differ from larger urban centres in the south. In every instance, people living in encampments are the ones best able to identify their own needs and must be fully engaged in determining and implementing solutions.

These Recommendations include legislative and regulatory measures, policies, and programs that advance the progressive realization of the right to adequate housing in accordance with Canada's human rights obligations, including those affirmed in the Charter and Constitution and international instruments such as the UN Declaration on the Rights of Indigenous Peoples. These obligations place responsibilities on all levels of government.

The Recommendations identify a series of distinct actions to be undertaken by federal, provincial, territorial and municipal governments to respect, protect and fulfill the right to adequate housing and other human rights implicated in the context of encampments.

First Nations, Inuit and Métis are over-represented among people living in encampments. This is a result of historic and ongoing failures to uphold the distinct rights of Indigenous Peoples affirmed in domestic and international law. Therefore, the Recommendations include specific measures that need to be undertaken in partnership with Indigenous governments and representative organizations.

1. The Federal Government must lead the development of a National Encampments Response Plan in cooperation and consultation with all other governments.

- In consultation and cooperation with First Nations, Inuit and Métis governments and representative organizations, **the Minister of Housing, Infrastructure and Communities and Infrastructure Canada must** lead development of a **National Encampments Response Plan** that recognizes Canada's human rights obligation to commit maximum available resources, all available means and demonstrate progress in a timely manner.
 - The plan must include **new resources** commensurate with the scale of the problem and a clear human rights-based strategy to ensure sustained and meaningful engagement with people with experience living in encampments.
 - The plan should aim to provide coordinated responses among all governments and across all government departments and agencies and ensure local authorities have the resources they need to address the range of housing, healthcare, income and other supports needed by people experiencing homelessness using human rights-based approaches.
 - The Plan should include clear targets and timelines for offering adequate housing to people living in encampments in response to the findings of the Auditor General's **Ending Chronic**

- Homelessness** as well as a strategy for monitoring progress towards the established targets.
- The plan should recognize the urgency to act and be in place by August 31, 2024.
 - Development of the plan must include provincial and territorial governments, First Nations, Inuit and Métis governments, municipalities (coordinated and convened by Federation of Canadian Municipalities (FCM) between municipalities and the federal government) and right to housing organizations who can convene people with lived experience in encampments and people with human rights expertise.
 - In consultation with the Federal Housing Advocate, **The Minister of Housing, Infrastructure and Communities** must establish an advisory process which includes lived experts and Indigenous leadership to guide development of the plan.
 - The plan must leverage existing Federal, Provincial and Territorial bodies such as the Federal, Provincial and Territorial Forum on Housing and similar bodies addressing mental health and addictions to ensure better coordination of human rights-based responses.
 - Explore how to mobilize resources and coordinate efforts with other federal action plans (e.g. Addictions and Mental Health, Gender-based violence, Anti-racism, 2SLBTQQA+, Poverty reduction strategy, UNDRIP Action Plan, Missing and Murdered Indigenous Women, Girls and 2SLGBTQQA+ People National Action Plan)
 - Establish mechanisms to monitor the results of the Response Plan In fulfilling the right to adequate housing for people in encampments.
- As a first step, **The Minister Housing Infrastructure and Communities must** immediately convene meetings on homelessness and encampments with provinces, territories, and municipalities to coordinate an all-of-government response.

2. Commit to a human rights-based approach to address the needs of encampment residents.

- **The Minister of Housing, Infrastructure and Communities'** response to this report must publicly commit to a human rights-based response to encampments and to developing a National Encampment Response Plan.

Federal, Provincial, Territorial and municipal governments must:

- Integrate the human rights principles and guidance set out in the [National Protocol for Homeless Encampments in Canada](#) and the [Homeless Encampments: Municipal Engagement Guidance](#), both produced by The Shift.
- Consistently use the human rights language of the National Housing Strategy Act across all government legislation, policy, and communications.

- Cease using language that stigmatizes or discriminates against people living in encampments or undermines the work of grassroots organizations providing support to them.
- Adopt policies and procedures on how to conduct meaningful, culturally safe, and trauma-informed engagement with people living in encampments or experiencing homelessness.
- Recognize the right of people in encampments to be part of the decision-making process which means:
 - Recognizing and engaging with the informal peer leadership in encampments;
 - Supporting the emergence of camp-led consensus-based decision making.
- Ensure people who have lived/living experience with addictions and substance use have a central role in designing the health solutions they need.

The Federal Government:

- **Infrastructure Canada and the Canadian Mortgage and Housing Corporation must** include conditions in funding agreements with provinces, territories, and municipalities that ensure that all use of federal housing-related funds respect and fulfill Canada's international and domestic human rights obligations.

Provincial and Territorial governments must:

- Adopt provincial or territorial legislation recognizing the human right to adequate housing as defined in international law.
- Review provincial and territorial human rights codes to ensure explicit prohibition of discrimination based on social condition such as income levels, being unemployed or experiencing homelessness.
- Develop programs to ensure that people residing in encampments, shelter and precarious housing are aware of their human rights, including the right to housing.

Municipal governments must:

- Develop a human rights-based policy related to encampments and ensure that any response to encampments prioritizes upholding the human rights of encampment residents. The role of police and by-law officers should be de-emphasized in these responses.
- Ensure the development of all relevant by-laws, policies, programs and plans includes meaningful engagement with people with lived experience in encampments.

3. All measures must respect the inherent rights of Indigenous Peoples.

Federal, provincial, territorial and municipal governments must:

- Support Indigenous governments to provide self-determined, culturally appropriate housing and supports to their citizens regardless of place of residency, including through recognition of First Nations, Inuit and Métis jurisdiction, accelerated transfer of care and control of housing and homelessness programs and programs in other areas such as mental health and addictions (as requested); and respecting existing funding arrangements with Indigenous governments and their

representative organizations.

- Support and allocate funds to ensure the full and effective implementation of housing and homelessness action plans developed by First Nations, Inuit and Métis governments and organizations, including the First Nations Housing and Related Infrastructure Strategy, the Inuit Nunangat Housing Strategy, and the Canada-Métis Nation Housing Sub-Accord.
- Substantially increase investment in adequate, sustainable, and culturally appropriate housing in First Nations, Inuit, and Métis communities based on accurate assessment of needs and the actual costs of building and maintaining housing in small, remote and northern communities.
- Work with Indigenous Peoples to more effectively respond to the distinct needs of urban First Nations, Inuit, and Métis individuals, particularly those who are unhoused and living in encampments.
- Support Indigenous governments and engage with relevant Indigenous service providers to develop and implement holistic strategies to provide wrap-around supports to Indigenous individuals who are unhoused or living in encampments with a goal of providing access directly into adequate housing.
- Ensure that all departments and agencies engaged in the design and delivery of housing-related services make a concerted effort to have their staff, management and boards be representative of First Nations, Inuit and Métis people. All departments and agencies must also provide cultural safety training for all staff and management.
- Implement Indigenous-led training on the UN Declaration on the Rights of Indigenous Peoples as called for by the Truth and Reconciliation of Canada and prioritize implementation of all Calls to Action relevant to resolving the crisis of housing and homelessness.
- Support the role of cultural workers, Elders and Knowledge Keepers in the process of finding solutions and supporting individuals experiencing homelessness.
- Work with First Nations, Inuit and Métis governments and organizations in building capacity to collect and analyze relevant homelessness data and ensure data collection initiatives respect Indigenous data sovereignty as reflected, for example, in the principles of First Nations Ownership, Control, Access, and Possession (OCAP®).
- Take action to “support the establishment and long-term sustainable funding of Indigenous-led low-barrier shelters, safe spaces, transition homes, second stage housing, and services for Indigenous women, girls, and 2SLGBTQIA people who are homeless, near homeless, dealing with food insecurity, or in poverty, and who are fleeing violence or have been subjected to sexualized violence and exploitation” as called for by the National Inquiry on Missing and Murdered Indigenous Women and Girls and prioritize implementation of the Inquiry’s other Calls to Justice relevant to addressing the housing needs of Indigenous women, girls and 2SLGBTQIA+ persons.

4. Take immediate action to respect and protect the human rights and dignity of all people living in encampments and reduce the risks that they face.

The federal government:

- **All federal ministries must** prohibit forced evictions of encampments on federal lands, including lands that are operated by agencies and other federal entities.
- **Infrastructure Canada must** increase funding designed to prevent and reduce homelessness. New money must be added to address encampments, reflect the increased scope of the problem and to reach the increasing number of communities facing a homelessness crisis.
- **The Minister of Health and the Minister of Mental Health and Addictions must** ensure healthcare funding, including allocations for mental health and addictions, specifically references the urgent needs of encampment residents.
- **Health Canada and the Public Health Agency of Canada must** invest in upstream interventions to prevent mental illnesses and substance use disorders and promote good physical and mental health.
- **Health Canada and Public Safety Canada must** take measures to protect people living in encampments from the poison drug epidemic by supporting access to safe supply and other harm reductions services in order to save the lives of encampment residents who rely on the unregulated drug supply and are at risk of overdose.

Provincial and territorial governments must:

- Prohibit forced evictions of encampments on public lands²⁷.
- Support municipalities in putting in place alternatives to removal of encampments.
 - Support meaningful engagement as the priority for finding solutions that fulfill the human rights obligations to provide safety and security for encampment residents.
 - Support Indigenous-led interventions to provide culturally appropriate services and supports for First Nations, Inuit and Métis individuals living in encampments.
 - Ensure funding for services and supports is available for municipalities (regardless of their size), including healthcare funding to address the complex needs of encampment residents.
 - Ensure adequate housing alternatives are available when people are ready to leave an encampment.
- Adopt provincial or territorial action plans for the safety and well-being of encampment residents based on meaningful engagement with those residents and their advocates and in consultation and cooperation with Indigenous Peoples, as well as federal and municipal governments.
- Adequately fund individualized social and mental health supports and other measures that help individuals to maintain a stable living situation.

²⁷ The prohibition of forced evictions in international law does not distinguish between public and private lands. However, as encampments are generally established on public lands, the Advocate's recommendation focuses on public land.

- Provide direction to law enforcement agencies to halt the confiscation of belongings, surveillance and harassment which can be violations of the human rights of encampment residents. This includes providing direction to law enforcement and relevant authorities to end practices which make drug use grounds for displacement, seizure of property, mandatory referrals to health and social services and treatment, and other measures that impose coercive limitations on the rights of encampment residents who use drugs.
- Ensure greater coordination amongst provincial service providers and systems to meet the needs of people living in encampments (i.e. healthcare, income-support, housing).
- Take measures to protect people living in encampments from the poison drug epidemic by supporting access to safe supply and harm reduction services for encampment residents.
- Leverage and adequately fund community-based organizations to provide urgent care for mental health, addictions, and substance use, including grief counselling and trauma support for those who use drugs, their families, and those who work with them.
- Increase support to facilitate access to low-barrier shelter options.
 - Ensure adequate funding for shelters to remove barriers and address individualized needs of women, Indigenous individuals, racialized groups, 2SLGBTQIA+ individuals, families, people with pets, people with disabilities and people who use drugs.
 - Ensure provision of on-site supports and harm reduction for people who use drugs as well as people with mental health issues and brain injuries.
 - Ensure shelters implement trauma-informed approaches.
 - Ensure funding for shelters for people fleeing gender-based violence.

Municipal governments must:

- End the practice of forced evictions of encampments on public lands.²⁸
- Put in place alternatives to removal of encampments.
 - Ensure meaningful engagement as the priority for finding solutions that meet the needs of encampment residents.
- Implement measures to protect and support people living in encampments:
 - In consultation with encampment residents, identify needs and provide dignified access on site or in reasonable proximity to essential facilities and services such as clean drinking water, sanitation, cooking facilities and waste collection (see the [list of essential services](#) developed by the National Working Group on Homeless Encampments).
 - Respect people's right to refuse services.
 - Eliminate any policies or practices that restrict access to encampment sites during daylight hours or require daytime tear down of tents and removal of personal effects.
 - Facilitate delivery of existing services and supports such as health care and income supports to encampment residents which are the responsibility of other governments.

²⁸ The prohibition of forced evictions in international law does not distinguish between public and private lands. However, as encampments are generally established on public lands, the Advocate's recommendation focuses on public land.

- In discussion with women and gender-diverse encampment residents, provide services for persons who have or are experiencing gender-based violence and identify and support measures to enhance the protection of women and 2SLGBTQQIA+ individuals, particularly those who are Indigenous.
 - Ensure protection from the poison drug supply through access to harm reduction services and regulated safe supply for encampment residents who are at risk of overdose because of reliance on an unregulated supply.
 - Provide access to storage facilities for people to protect their belongings.
 - Ensure availability of transportation so that encampment residents have ready access to clinics and other supports.
 - Ensure that police, bylaw enforcement officers and private security firms do not play any direct role in managing encampments.
 - Respect Indigenous protocols and ensure municipal services are culturally appropriate.
 - The availability of services to people experiencing homelessness should not be a justification for an eviction.
- Ensure drop in-shelters are accessible 24/7 throughout the year to provide people with a dignified place to rest, take refuge from the elements and access services.
 - Repeal any regulations that restrict people experiencing homelessness from accessing public space.
 - Repeal by-laws and other regulations which prohibit encampment residents from using public spaces.
 - Ban “hostile architecture” (e.g. spikes on sidewalks, armrests on benches) that is designed to stop homeless people from sitting, sleeping and sheltering.
 - Repeal and/or refrain from passing by-laws that restrict community members from offering support services to encampment residents.
 - Empower and support residents to manage their encampments themselves to the extent possible. Government resourcing and supports should not be used to undermine resident autonomy or decision-making. Government should support encampment residents in creating collective camp-wide processes for decision-making, but they should not run these processes.
 - Provide direction to by-law enforcement officers and emergency service to halt the confiscation of belongings, along with surveillance and harassment which may constitute violations of the human rights of encampment residents. This includes providing direction to all relevant municipal agencies to end practices which make drug use grounds for displacement, seizure of property, mandatory referrals to health and social services and treatment, and other measures that impose coercive limitations on the rights of encampment residents who use drugs.
 - Ensure that drug use – or perception of drug use – is not a pretext for restricting access to essential supports and services.
 - Promote collaboration among municipal agencies and community-based service providers to provide an integrated approach to meeting the needs of encampment residents and referring people to the available services.
 - Provide financial and other support to organizations serving encampment residents to ensure adequate staffing levels and address risk of overwork and burnout.

- While permanent housing remains the ultimate goal, immediate improvements to existing emergency shelter services are also needed. Shelter providers must:
 - Ensure that their facilities and services are designed to accommodate and be accessible for people with specific needs (e.g., for Indigenous individuals, women, Black and racialized individuals, 2SLGBTQI+ people, couples, families, youth, seniors and people with disabilities).
 - Put in place policies and practices that are trauma-informed and that meet the needs of and respect the dignity and human rights of people experiencing homelessness.

5. Implement immediate measures to address the root causes of encampments and provide access to adequate housing.

The Federal Government:

- In consultation with First Nations, Inuit and Métis governments and representative organizations, **Infrastructure Canada and the Canadian Mortgage and Housing Corporation** must re-orient the current and future National Housing Strategies to ensure there is a priority on initiatives that will rapidly increase the supply of adequate and affordable non-market housing for people transitioning out of encampments and others experiencing homelessness.
 - Provide **new** long-term and predictable funding and ensure resources are also available to small, medium, rural, remote and northern communities who are experiencing growing problems of homelessness.
 - Expand and sustain funding to rapidly create new housing units building on lessons learned from the Rapid Housing Initiative.
 - Establish a properly funded Acquisition Fund to allow municipalities, local land trust organizations and non-profit housing providers to acquire, repair, and operate existing affordable market rental housing.
 - Review the Canada Housing Benefit to ensure it is being leveraged to prevent homelessness, address core housing need, and assist people to return to housing.
 - Create efficient and cost-effective long-term programs (such as direct transfer of adequate public lands, direct lending and preferential lending rates) that allow for the creation of new non-market adequate housing that meets the needs of encampment residents and people at risk of homelessness.
 - Prioritize making resources available to address groups that are in greatest need, including First Nations, Inuit and Métis individuals, Black Canadians, other racialized communities, women, 2SLGBTQQIA+ individuals, people fleeing gender-based violence, youth, seniors and people with disabilities.
- Recognizing that housing is an important social determinant of health and that unaddressed mental and physical health needs contribute to homelessness and that homelessness can have severe mental and physical health impacts, **Infrastructure Canada, Health Canada and the Public Health Agency of Canada must work with Women and Gender Equality Canada** to ensure better integration of housing and public health policies, particularly for women, 2SLGBTQQIA+ individuals and youth.
- **Infrastructure Canada must** support the documentation and sharing of promising practices to facilitate the spread of effective human rights-based responses to homeless encampments.

- **The Minister of Health and the Minister of Mental Health and Addictions** must develop national legislation, parallel to or within the National Health Act, to bring parity, accountability and transparency to federal funding to provinces and territories for programming and services related to mental health and substance use.
- **Immigration, Refugees and Citizenship Canada** must increase funding for refugee housing supports.
- **Statistics Canada and Infrastructure Canada** must facilitate the collection of better data that captures the diverse needs and experiences of people living in encampments, including women and 2SLGBTQQA+ people.

Provincial and Territorial governments must:

- Work with the federal government, municipalities as well as First Nations, Inuit and Métis governments and representative organizations to identify and implement permanent and affordable housing solutions.
- Increase funding for supportive housing, including units inclusive of trans and non-binary people.
- Increase funding for municipal services that provide access to housing and address the needs of those who are unhoused and living in encampments, including providing funding to ensure sufficient staffing.
- Increase income supports as well as the minimum wage to reflect the high cost of living and to reinforce efforts to prevent homelessness and allow for successful transitions to adequate housing solutions.
- Strengthen protection of tenant rights, including rent control and vacancy control, as well as protection against above-guideline rent increases, forced evictions for rent arrears and evictions into homelessness.
- Provide adequate funding to housing organizations who are housing people exiting out of chronic homelessness, including encampments, in order to ensure individualized social and mental health supports for high acuity tenants.
- Provide supports for community-based organizations that allow them to retain and meet the mental health needs of frontline workers.
- Reduce bureaucratic barriers to accessing permanent housing, such as requirements to provide tax returns and establishing accessible processes for other requirements, such as obtaining identification.
- Undertake reviews to better understand and address systemic failures that drive homelessness during transitions out of the child welfare system, the prison system, hospitals, gender-based violence shelters and other institutional environments.
- Reduce bureaucratic barriers for unsheltered individuals to access permanent housing, such as obtaining identification.

Municipal governments must:

- Ensure programs are available to rapidly rehouse anyone entering encampments using available housing allowances and providing individualized supports where necessary to support them in maintaining their housing.
- Put in place measures to facilitate the rapid construction of non-market affordable housing.
 - Immediately provide surplus municipal land at no cost in areas close to transit and other necessary amenities to non-profit affordable housing providers or land trusts.
 - Implement zoning and other changes to fast track the development of community housing.
 - Waive development and other municipal fees to fast-track non-profit affordable housing and support the operations of the housing providers over the long-term.
- Maintain strong standards and enforcement for state of repair in rental units and other landlord obligations to address conditions which can lead to homelessness.
- Strengthen housing loss prevention initiatives, including accessible emergency funds to reduce incidents of evictions due to late payment of rent.

6. Ensure government accountability and that people experiencing homelessness have access to justice.

All governments must:

- Require that all officials with responsibilities relevant to housing, homelessness, and encampments receive training on the right to adequate housing, Gender-based Analysis (GBA) Plus, and the UN Declaration on the Rights of Indigenous Peoples.

The Federal government:

- **Justice Canada must** change government litigation strategies to ensure access to justice for violations of the right to life, security and equality experienced by those who are experiencing homelessness or living in precarious housing and instruct government lawyers to cease from arguing that the right to adequate housing is non-justiciable or that courts in Canada should not require governments to ensure access to housing in order to comply with the rights to life or equality.
- **Global Affairs Canada, Canadian Heritage and Justice Canada** must lead a process aimed at ratifying the Optional Protocol of the International Covenant on Economic, Social and Cultural Rights to afford all in Canada a right to make complaints to the Committee.
- **Canadian Heritage must** ensure that [the Forum of Federal-Provincial-Territorial Ministers Responsible for Human Rights](#), [the Senior Officials Committee Responsible for Human Rights](#), and [the Continuing Committee of Officials on Human Rights](#) follow up on Canada's obligations to respect, protect and fulfill the human rights of people living in encampments.
- Recognizing that access to justice is a fundamental principle of human rights, **Canadian Heritage must work with Justice Canada and Infrastructure Canada** to provide funding to enable both civil society organizations and rights holders to better organize and access the human rights

accountability mechanisms established under the NHTS as well as mechanisms established by other governments.

- **Canadian Heritage must** expand Federal Court Challenges program or develop a similar type of program so that encampment residents and advocates working with encampment residents have recourse to litigation as necessary to advance the right to adequate housing.
- **Public Safety Canada must** develop and publicize guidelines for the RCMP on their human rights obligations when engaging with encampment residents, such as in the investigation of a violent crime targeting residents. RCMP officers should also receive Cultural Sensitivity Training and be made aware of local Indigenous supports before working with First Nations, Inuit and Métis encampment residents.

Provincial and Territorial Governments must:

- Establish and/or strengthen systems such as legal aid so that encampment residents and people experiencing homelessness or precarious housing have timely access to mechanisms to protect their rights or pursue redress for rights violations.
- Develop alternative mediation and dispute resolution mechanisms accessible to people living in encampments, consistent with principles of restorative justice, and able to give due regard to Indigenous legal traditions.
- Ensure that an independent body such as human rights commission, ombuds office, or housing advocate has the mandate and resources necessary to review systemic housing issues.
- Review provincial and territorial human rights codes to ensure prohibition of discrimination based on social condition, housing status and other forms of discriminatory treatment experienced by people experiencing homelessness.
- Develop guidelines for provincial police services on their human rights obligations when engaging with encampment residents.

Municipal governments must:

- Establish independent municipal accountability mechanisms. Larger municipalities should consider creating Ombuds offices.
- Document and make public all decisions related to municipal services for encampments in a manner that makes this information accessible to encampment residents and the wider public.
- Prohibit any restrictions on freedoms of association and assembly.
- Ensure journalists have access to and can report on encampment clearances and evictions.
- Ensure advocates and trusted service providers are allowed to support encampment residents if an eviction is threatened. Peaceful demonstrations and protests must be allowed.

ANNEX A

List of Engagement Partners

Facilitating the collection of submissions from encampment residents
Alliance to End Homelessness Ottawa, Ottawa, Ontario
BRAS Outaouais, Gatineau, Quebec
Canadian Lived Experience Leadership Network (CLELN)
Caroline Leblanc, Université de Sherbrooke
Le Centre d'intervention et de prévention en toxicomanie de l'Outaouais (CIPTO), Gatineau, Quebec
Clinique interdisciplinaire en droit social de l'Outaouais (CIDSO), Gatineau, Quebec
Dopamine, Montreal, Quebec
Elizabeth Fry Society of Mainland Nova Scotia, Dartmouth, Nova Scotia
Hamilton Social Medicine Response Team, (HAMSMART), Hamilton, Ontario
Lived and Living Experience of Homelessness Network (LLEHN), Victoria, British Columbia
Neighbourhood Solidarity with Unhoused Neighbours (NSUN), Victoria, British Columbia
Peel Alliance to End Homelessness, Peel, Ontario
Pivot Legal Society, Vancouver, British Columbia
Spectre de Rue, Montreal, Quebec
Stop the Sweeps, Vancouver, British Columbia
The Housing Justice Project, Victoria, British Columbia
The John Howard Society of Southeastern New Brunswick, Moncton, New Brunswick
The Shift

Supporting Engagement Activities
Canadian Alliance to End Homelessness (CAEH) 2023 National Conference Halifax
Canadian Drug Policy Coalition (CDPC)
Canadian Lived Experience Leadership Network (CLELN)
Caroline Leblanc, Université de Sherbrooke
Federation of Canadian Municipalities
Main Street Project and West Central Women's Resource Centre, Winnipeg
National Indigenous Housing Network (NIHN)
National Right to Housing Network (NRHN)
Pivot Legal Society, Vancouver
Regent Park Community Health Centre
Réseau d'aide aux personnes seules et itinérantes de Montréal (RAPSIM)
Réseau SOLIDARITÉ itinérance du Québec (RSIQ)
Stop the Sweeps, Vancouver
Table des Organismes Montréalais de Lutte Contre le Sida (TOMS)
The Salvation Army, Saskatoon, Saskatchewan
Women's National Housing and Homeless Network (WNHHN)

Engagement with Indigenous government entities and National Indigenous Organizations
Assembly of First Nations (AFN)
British Columbia Assembly of First Nations
Congress of Aboriginal Peoples (CAP)
Inuit Housing and Homelessness Caucus
Manitoba Metis Federation
Métis Nation Government in British Columbia
Métis National Council – Métis Nation Housing Working Group
National Association of Friendship Centres (NAFC)
Native Women's Association of Canada (NWAC)
Nunatsiavut Government (NG) and Nunavut Tunngavik Incorporated (NTI)

Methodology

Lived and living experts who attended meetings with the Advocate were compensated according to Canadian Human Rights Commission (CHRC) guidelines. Sharing of information was purely on a voluntary basis.

**MICHAEL NANOS AND JOSEPH
MICALLEF**
Plaintiffs

**THE CORPORATION OF THE CITY OF
CAMBRIDGE**
Defendant

Court File No.: CV-24- 00000526-0000

**ONTARIO
SUPERIOR COURT OF JUSTICE**

Proceeding commenced at KITCHENER

AFFIDAVIT OF ERIN DEJ

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Ashley Schuitema LSO #68257G
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Email: ashley.schuitema@wrcls.cjci.ca

Lawyers for the Plaintiffs, Michael Nanos and
Joseph Micallef

TAB 2

Court File No. CV-24-00000526-0000

**ONTARIO
SUPERIOR COURT OF JUSTICE**

B E T W E E N:

MICHAEL NANOS and JOSEPH MICALLEF

Plaintiffs

and

THE CORPORATION OF THE CITY OF CAMBRIDGE

Defendant

AFFIDAVIT OF JESSE BURT

I, **JESSE BURT**, of the City of Kitchener, in the Province of Ontario, AFFIRM AS FOLLOWS:

1. I have personal knowledge with respect to the facts set out below, except where stated otherwise. Where the information is not based on my personal knowledge, it is based upon information provided by others which I believe to be credible and true.
2. I am employed as the Cambridge Harm Reduction Lead for the Aids Committee of Cambridge, Kitchener, Waterloo and Area ("ACCKWA") since October 13, 2020. My educational experience is in Health Sciences from the University of Waterloo. I have worked in various outreach and support roles since 2018, including with St. John's Kitchen operated by the Working Centre, One Roof Youth Services, and House of Friendship shelter.

3. As the Harm Reduction Lead for Cambridge, I support people who are experiencing homelessness in various ways, including by ensuring people have access to basic needs such as: tents, tarps, food, water, washrooms, showers, laundry, harm reduction supplies. I also provide assistance to navigate various systems such as: emergency shelter, housing lists, medical, hospital, food resources, ID, income supports, vet care, probation, and provide support and education for those using substances.
4. I have been doing encampment outreach to those experiencing homelessness in Cambridge for over three years. In this role I have visited dozens of encampment sites in Cambridge and have supported up to hundreds of individuals to varying degrees (from providing basic needs to more intensive support of people over the course of years through various evictions and moves). I have witnessed many encampment evictions, have observed the cycles of harm that perpetuate at each eviction and have provided support to those in crisis while facing eviction.

SHELTER INACCESSIBILITY AND SAFETY CONCERNS

5. For many of the people I support in Cambridge, the emergency shelter system is inaccessible. You cannot show up at an emergency shelter without first calling First Connect (the phone line agency run by the Region of Waterloo). Many of the people I support do not have access to a telephone. I have tried calling First Connect hundreds of times with people and have had no one pick up, have had to wait on hold for long periods of time, and have listened to intrusive questions being asked before the service person will even reveal if a bed is available. Most often people are turned away because no bed is available. Or a bed is available that

they cannot access because it is at a shelter where they are service restricted, it is at a shelter that is abstinence only and they use substances, it is at a shelter that doesn't accept couples and they are not willing to separate, etc.. Many of the people I support no longer ask me to call First Connect because they have given up on the shelter system being accessible.

6. I have heard many concerns from the people I support about the Bridges Shelter in Cambridge. Many of the people I support will not go to Bridges because they have had negative experiences there in the past. Some people are restricted from accessing services at Bridges and are banned from the site. Many people have experienced assaults, violence and thefts there. Like most shelters, Bridges has a communal sleeping area and many people suffer from severe sleep deprivation in this environment, which leads to a significant increase in mental health symptoms. Shelters are also extremely triggering for people who have been institutionalized due to the confined space, being around people that are struggling with their mental health, and the rules/rigidity. Finally, Bridges is an abstinence only shelter, however many people use substances there and this can be triggering for people trying to abstain from using.
7. Cambridge has no emergency shelter for women or gender diverse people experiencing homelessness. On occasion, the Bridges Shelter will make an exception for women if there are no beds available at the YWCA Women shelter in Kitchener. However, once a bed becomes available at the YWCA, Bridges will require the woman to move to the Kitchener shelter. I have been supporting

women who become very frustrated by this and decide to return to camping outside or couch surfing rather than going to Kitchener.

HARMS FROM ENCAMPMENT EVICTIONS

8. I have witnessed dozens of encampment evictions and have witnessed the harms caused each time. There are perpetual cycles of harm and each encampment eviction has similar themes of harm, including:

- being required to urgently pack up survival items, including tents which are often make-shift and do not pack up or transport easily so they are often left behind;
- losing survival items (clothing, cookware, heat sources, documents/paperworks/ID, naloxone) because of the urgency in packing up and moving along or because they have no way to transport these items. Attached hereto and marked as **Exhibit "A"** to my affidavit is a copy of a photo person I was supporting in Cambridge that experienced severe frostbite due to lack of survival items;
- extreme stress, emotional and mental health symptoms increased – anxiety, sadness, anger, frustration, depression, hopelessness, suicidal ideations;
- increased substance use as a result of displacements/stress of eviction. Also when people are forced into more isolated locations this can include increased risks of overdose when people are using alone or away from service providers (no access to health care, harm reduction). Additionally when people are forced to wander the streets throughout the night, people will increase substance use to stay awake for safety from strangers and from the elements;

- loss of support services (including health care and harm reduction) because service providers cannot find residents or it takes a while to get reconnected. This can lead to a person being removed from the housing list, because the list requires frequent and regular engagement and updating; and,
 - increased distrust in agencies and services trying to do outreach to the point of total disengagement of all social services
9. In 2021, I helped a 28-year-old individual that evicted from an encampment in Cambridge. I will never forget this experience. I helped him pack up his belongings, but he had to leave many items behind. He cried the whole time. He talked to me at length about how he felt completely undesired/unwanted by the community and he expressed suicidal ideations. He found living communally at the encampment to be supportive and now everyone was scattering and he would be alone. He wanted to relocate further outside of the City, deeper into the woods, because he feared further evictions. He said he could not handle that again. I assisted him with this relocation. Once he was living in the woods he no longer accessed our drop-in space. We would visit him at his new location, deep in the forest by himself. He was sad, depressed and using substances alone. Not long after this eviction, he died alone in his tent due to an overdose.

150 MAIN STREET ENCAMPMENT EVICTION

10. I was supporting a female resident that was living at the 150 Main Street encampment. She left on a weekend to attend a funeral out of town and when she returned all her belongings had been disposed of by bylaw. After this she disappeared and stopped coming to the drop-in service. I was told she was living

in a bush on the Grand River Conservation area. It was a large bushed area and I spent many days out there looking for her and was unable to find her.

SOPER PARK ENCAMPMENT EVICTION

11. In September of 2023, the City of Cambridge evicted approximately 30 residents from an encampment at Soper Park. When the eviction notice was posted on Friday September 22, 2023, I spoke to a number of residents who expressed a variety of reactions. One of the first people I approached to ask if he had any plans of where to go told me he was going to kill himself. Some people were newly homeless and wanted to try to fight the eviction, many others scattered, some people were families/couples and were distraught because they knew they could not access shelter, some had suicidal ideations and many were extremely defeated. Following this eviction, I know of one person that returned to an abusive partner because she had nowhere else to go.

BRANCHTON ENCAMPMENT

12. Since this encampment started in August of 2023, our outreach team has visited biweekly. There have been at least thirteen (13) individuals that have stayed at this site for various periods of time, including at least five (5) women. This location is very secluded and is a wooded area out of sight from the sidewalk, road, or the Petro-Canada gas station. It is a grassy lot and the location is accessible to support services downtown Cambridge. Attached hereto and marked as **Exhibit "B"** to my affidavit is a copy of photos of the encampment.

13. In and around December 12, 2023, the encampment residents were notified by By-law officers that they would need to leave the site. At this time our outreach team requested an extension until after Christmas break. Although a formal eviction process did not take place at that time, many of the residents relocated to other properties in Cambridge.

14. Michael Nanos called me on March 18, 2024 to advise me that Bylaw was at the property and they were being evicted. Attached hereto and marked as **Exhibit “C”** are photos of an eviction sticker that was placed on one of the tents. Our outreach team worked with bylaw to request an extension of the eviction deadline until Thursday, March 28, 2024.

LIMITED DAYTIME SHELTER OPTIONS IN CAMBRIDGE


15. There are five (5) places in Cambridge that provide indoor daytime services for people experiencing homelessness. However, none of these locations have space or capacity for someone to lie down or rest, most of these places are crowded and noisy, they are bright and only offer services for a few hours during the day.

Location	Capacity	Services	Limitations
Bridges 26 Simcoe St. Cambridge	80 people	-indoor space for residents from 8:00 am to 4:00 pm, Monday to Friday -take out dinner 7 days a week -take out lunch Thursdays/Saturdays	-you cannot access the indoor space unless you are staying at the shelter -no daytime space to lie down/rest

<p>Cambridge Vineyard</p> <p>147 Elgin St. N., Cambridge</p>		<p>-showers</p> <p>-laundry</p> <p>-drop in space with clothing room and grocery room</p> <p>-meals 6 days a week</p>	<p>-no where to lie down/rest</p> <p>-religious space so may not be accessed by some</p>
<p>Multi-Agency Community Space (ACCKWA)</p> <p>150 Main St, Cambridge</p>	<p>10-15 people indoors at one time</p>	<p>-drop in from 1:00 to 4:00 pm Monday to Friday</p> <p>-medical, housing workers, peer workers, harm reduction, counselling, off-site laundry</p>	<p>-no where to lie down/rest</p>
<p>Trinity Community Table</p> <p>12 Blair Rd, Cambridge</p>	<p>150-200 people</p>	<p>-meal and takeout 10:30 am to 12:30 pm on Mondays, Wednesdays and Fridays</p>	<p>-no where to lie down/rest</p>
<p>519 Community Collective</p> <p>26 Ainslie St. S., Cambridge</p>		<p>-take out meal 5:00 pm to 6:00 pm on Thursdays and Saturdays</p>	<p>-no room to sit down or stay inside</p>

16. I swear this affidavit in support of the Notice of Motion and for no other or improper purpose.

AFFIRMED BEFORE ME in the)
 City of Kitchener, this 25 day of)
 March, 2024)
 In the Regional Municipality of Waterloo)


 ASHLEY ELIZABETH SCHUITEMA
 A Commissioner, etc.,
 Province of Ontario,
 While a Barrister and Solicitor.
 LSO # 68257G



 JESSE BURT

THIS IS **EXHIBIT "A"** REFERRED TO
IN THE AFFIDAVIT OF JESSE BURT
AFFIRMED THIS 25TH DAY OF MARCH, 2024

A handwritten signature in black ink, appearing to read 'Ashley Elizabeth Schuitema', written over a horizontal line.

ASHLEY ELIZABETH SCHUIITEMA

A Commissioner, etc.,
Province of Ontario,
While a Barrister and Solicitor.
LSO # 68257G



THIS IS **EXHIBIT "B-1"** REFERRED TO
IN THE AFFIDAVIT OF JESSE BURT
AFFIRMED THIS 25TH DAY OF MARCH, 2024

A handwritten signature in black ink, appearing to read 'Ashley Schuitema', written over a horizontal line.

ASHLEY ELIZABETH SCHUIITEMA

A Commissioner, etc.,

Province of Ontario,

While a Barrister and Solicitor.

LSO # 68257G



THIS IS **EXHIBIT "B-2"** REFERRED TO
IN THE AFFIDAVIT OF JESSE BURT
AFFIRMED THIS 25TH DAY OF MARCH, 2024

A handwritten signature in black ink, appearing to read 'Ashley Schuitema', written over a horizontal line.

ASHLEY ELIZABETH SCHUITEMA
A Commissioner, etc.,
Province of Ontario,
While a Barrister and Solicitor.
LSO # 68257G



THIS IS **EXHIBIT "B-3"** REFERRED TO
IN THE AFFIDAVIT OF JESSE BURT
AFFIRMED THIS 25TH DAY OF MARCH, 2024

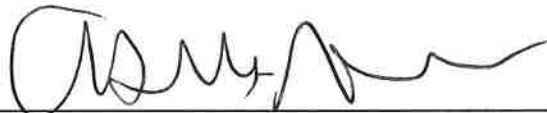
A handwritten signature in black ink, appearing to read 'Ashley Schuitema', written over a horizontal line.

ASHLEY ELIZABETH SCHUIITEMA

A Commissioner, etc.,
Province of Ontario,
While a Barrister and Solicitor.
LSO # 68257G



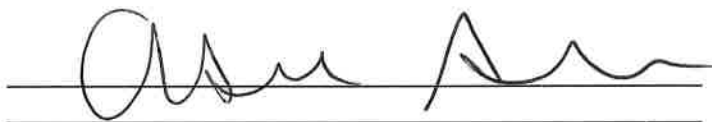
THIS IS **EXHIBIT "C-1"** REFERRED TO
IN THE AFFIDAVIT OF JESSE BURT
AFFIRMED THIS 25TH DAY OF MARCH, 2024

A handwritten signature in black ink, appearing to read 'Ashley Schuitema', written over a horizontal line.

ASHLEY ELIZABETH SCHUITEMA
A Commissioner, etc.,
Province of Ontario,
While a Barrister and Solicitor,
LSO # 68257G



THIS IS **EXHIBIT "C-2"** REFERRED TO
IN THE AFFIDAVIT OF JESSE BURT
AFFIRMED THIS 25TH DAY OF MARCH, 2024

A handwritten signature in black ink, appearing to read 'Ashley Elizabeth Schuitema', written over a horizontal line.

ASHLEY ELIZABETH SCHUITEMA
A Commissioner, etc.,
Province of Ontario,
While a Barrister and Solicitor.
LSO # 68257G



City of Cambridge
Corporate Services
50 Dickson Street
Cambridge, ON
N1R 5W8
Tel: 519-621-0740
Ext. 7907

Please be advised that the City of Cambridge
has been at this Structure / Tent and that it's on
City property and has to be removed by

March 28, 2024

If the structure / tent is not removed by the date
above the City of Cambridge will remove it and
dispose of all items.

Thank you for your anticipated co-operation
in this matter.

**MICHAEL NANOS AND JOSEPH
MICALLEF**
Plaintiffs

**THE CORPORATION OF THE CITY OF
CAMBRIDGE**
Defendant

Court File No.: CV-24-00000526-0000

**ONTARIO
SUPERIOR COURT OF JUSTICE**

Proceeding commenced at KITCHENER

AFFIDAVIT OF JESSE BURT

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Lawyers for the Plaintiffs, Michael Nanos and
Joseph Micallef

TAB 3

Court File No. CV-24-00000526-0000

**ONTARIO
SUPERIOR COURT OF JUSTICE**

B E T W E E N:

MICHAEL NANOS and JOSEPH MICALLEF

Plaintiffs

and

THE CORPORATION OF THE CITY OF CAMBRIDGE

Defendant

AFFIDAVIT OF LINDSAY SPRAGUE

I, **LINDSAY SPRAGUE**, of the City of Kitchener, in the Province of Ontario, AFFIRM AS FOLLOWS:

1. I have personal knowledge with respect to the facts set out below, except where stated otherwise. Where the information is not based on my personal knowledge, it is based upon information provided by others which I believe to be credible and true.
2. I am a Director with Sanguen Health Centre and oversee our Cambridge Street Outreach Team, our Community Health Van Program, Our Emergency Shelter and Harm Reduction Integration Initiative, and our Working to Improve Neighbourhood Safety ("WINS") Program. I have a Bachelor of Arts in Anthropology and a Ph.D. in Medical Anthropology. I have been working in the mental health/ addictions/harm reduction field since 2012.
3. Our team at Sanguen Health focuses on providing health and social care for individuals who experience marginalization and barriers to traditional health services

due to their drug use or by nature of being precariously housed or experiencing homelessness. Our agency operates with a person-centered approach to care, recognizing the inherent value of every individual and striving to provide tailored support services to meet their unique needs. Our multidisciplinary team offers a range of services, including Hepatitis C nursing support, medical treatment, primary care, peer support, outreach, harm reduction and substance use training, vaccinations, testing, counseling, wound care and case management.

4. The mission at Sanguen is to meet the needs of those in Waterloo Region and beyond who are living with or at risk for Hepatitis C, while also addressing the broader social determinants of health that contribute to marginalization and vulnerability.
5. Currently within the City of Cambridge we have a number of teams providing services, including:
 - a) Primary Care Bus which provides primary health care, social support, and infectious disease care;
 - b) Street Outreach team which provides nursing support, social support outreach, connections to housing supports, and basic essentials to individuals experiencing homelessness, including those in encampments;
 - c) Working to Improve Neighbourhood Safety ("WINS") which is a peer-based needle retrieval and outreach program operating with the downtown of Cambridge;
 - d) Community Health Van which provides harm reduction supplies including life-saving naloxone, basic food supplies, social support and nursing care to individuals precariously housed or unhoused; and,

- e) Emergency Shelter Harm Reduction Integration Initiative providing harm reduction education and capacity building in Emergency Shelters and associated community agencies.
6. Forced encampment evictions pose a significant risk to the individuals affected. The information I share below is based on what our team at Sanguen has experienced with forced evictions in Cambridge. Forced evictions re-traumatize people experiencing homelessness, exacerbating existing mental health issues, and contribute to increased suicidal ideation and risk. The experience of being forcibly removed from one's home and community can lead to increased feelings of fear, anxiety, and distress, further complicating efforts to address mental health needs.
7. Based on my knowledge of the available supports and services in Cambridge, there are little to no shelter beds available most nights of the year which necessitate people living outdoors. In particular, there are no designated shelter spaces/beds for women, and individuals who identify as women or gender-diverse within the City of Cambridge. As such, individuals who are forced from their encampments will likely not be offered an alternative, safe location that meets their needs - this is especially true of women who face more risk with being unhoused.
8. Many individuals who are living outdoors require significant time to build a suitable, protective structure to protect them from the elements - especially during these cold times of the year. With forcible evictions, individuals are removed from their location, often without the ability to plan ahead or bring their building materials with them. Depending on the elements, they could be left without a safe and protective structure within which to reside. In addition, the belongings that are key to their safety

and survival often get left behind or destroyed in the wake of an eviction. These include items such as emergency blankets, tarps, sleeping bags, and outdoor gear - items which our team purchase and provide to individuals living outdoors. These items, and items which have personal value, cannot be replaced easily.

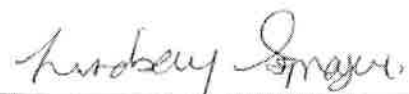
9. A more serious and irreparable harm that can result from forcible evictions is that individuals are pushed further to the outskirts of the City. When individuals are displaced from their location, they are also displaced from the services they rely on. These include nursing and physician support - including wound care, care for trench foot, treatment of infections, medications, and access to life-saving naloxone. Outreach workers may have difficulty locating individuals in order to provide care, follow-up and connection to health care supports. Treatment regimes (including for Safer Supply, HIV, Opioid Agonist Therapy, and Hepatitis C) become disrupted and individuals experience higher risk with respect to morbidity and mortality.
10. In addition, individuals may become displaced and isolated from their friends and family, which puts them at further risk of using substances alone, risk of overdose and death. When authorities intervene to forcibly remove individuals from encampments there is a ripple effect of further distrust of social services or other community supports, and a tendency to move further away from agencies and organizations providing meals, social support, mental health support, drop-in locations and housing services.
11. Finally, forced encampment evictions do not address the underlying causes of homelessness and often fail to achieve their stated aims of reducing the visibility of homelessness in public spaces. Instead, they create unnecessary polarization, erode

trust, and impede efforts to facilitate voluntary and rights-compliant paths to housing stability.

12. I swear this affidavit in support of the Notice of Motion and for no other or improper purpose.

AFFIRMED BEFORE ME in the)
City of Kitchener, this 25th day of)
March, 2024)
In the Regional Municipality of Waterloo)


ASHLEY ELIZABETH SCHUITEMA


LINDSAY SPRAGUE

A Commissioner, etc.,
Province of Ontario,
While a Barrister and Solicitor.
LSO # 68257G

**MICHAEL NANOS AND JOSEPH
MICALLEF**
Plaintiffs

**THE CORPORATION OF THE CITY OF
CAMBRIDGE**
Defendant

Court File No.: CV-24- 00000526-0000

**ONTARIO
SUPERIOR COURT OF JUSTICE**

Proceeding commenced at KITCHENER

AFFIDAVIT OF LINDSAY SPRAGUE

WATERLOO REGION COMMUNITY LEGAL SERVICES
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Kitchener, Ontario N2H 2P5

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Lawyers for the Plaintiffs, Michael Nanos and
Joseph Micallef

TAB 4

Court File No. CV-24-00000526-0000

**ONTARIO
SUPERIOR COURT OF JUSTICE**

BETWEEN:

MICHAEL NANOS and JOSEPH MICALLEF

Plaintiffs

and

THE CORPORATION OF THE CITY OF CAMBRIDGE

Defendant

AFFIDAVIT OF MARJORIE KNIGHT

I, **Marjorie Knight**, of the City of Cambridge, in the Province of Ontario, AFFIRM AND SAY:

1. I have personal knowledge with respect to the facts set out below, except where stated otherwise. Where the information is not based on my personal knowledge, it is based upon information provided by others which I believe to be credible and true.
2. I am a long time Cambridge resident and have worked with unhoused people in Cambridge for almost a decade. I also have personal experience with homelessness in Cambridge. In and around 2014, I was homeless for a period of four (4) months. During this time I accessed the Bridges Shelter in Cambridge, operated by Cambridge Shelter Corporation.
3. Since 2017 I have worked as a Family Outreach Worker at a Cambridge non-profit organization called House of Friendship. In this role, I regularly assist families that are facing housing issues or experiencing homelessness.

4. I am a member on the Board of Directors for the Cambridge Shelter Corporation, since in and around 2022.

EMERGENCY SHELTER IN CAMBRIDGE

5. The Cambridge Shelter Corporation is funded by the Region of Waterloo to operate the Bridges Shelter located at 26 Simcoe St, Cambridge. Bridges is the only emergency shelter in Cambridge and has capacity for 80 people. Bridges often operates at, or above, capacity.
6. As a member of the Board of the Directors for Bridges, the Board has had many and varied conversations about the issues that the Bridges Shelter experiences in providing services to the homeless community in Cambridge. Some of these issues include the fact that Bridges is predominately a male-only shelter, it follows an abstinence-only model, and it cannot accommodate couples, families or people with pets. Bridges also has difficulty accommodating people with physical disabilities and there are regularly issues with thefts and violence.
7. When I stayed at Bridges in and around 2014, I would sleep fully clothed with my shoes on and keep everything with me while I slept. Every day there were fights and the police were constantly there. I found myself living on the edge the whole time I was there. I was working six days a week while staying at Bridges and the stressful and tense atmosphere made it incredibly difficult to sleep, and very difficult to continue to attend work each day. There is nowhere in Bridges during the daytime to lay down and rest, although there is a space where you can access food and watch television during the day. People are provided a bin at the end of their bed to place their

belongings, but it does not lock. If someone has money they can rent a locker to store some belongings, but there have been reports of thefts even from locked lockers.

8. Many people are not able to access Bridges often because it is at capacity, but also because they may use substances, they may have service restrictions, they are in a couple, they have a pet, or they have had negative experiences in the past and are fearful about returning.

CAMBRIDGE ENCAMPMENT EVICTIONS

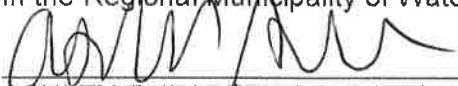
9. Canada is facing a national human rights crisis in relation to encampments and homelessness. The Federal Housing Advocate has called for an end to forced encampment evictions and yet the City of Cambridge continues to engage in an extreme approach to penalize homelessness, including clearing encampments regularly and playing a cruel game of whack-a-mole with encampment residents.
10. In August of 2023, an encampment at 150 Main Street, Cambridge was closed by the Region of Waterloo. At certain points, this encampment housed approximately 50 people. When it was closed people moved to various outdoor locations around Cambridge, including to Soper Park. Attached hereto and marked as **Exhibit "A"** to my affidavit is a copy of a CBC article dated September 1, 2023.
11. This encampment closure came at a time when the Bridges Shelter, and other emergency shelters in Waterloo Region, were experiencing a significant increase in refugee claimants accessing shelter services. Attached hereto and marked as **Exhibit "B"** to my affidavit is a copy of a Record article dated August 18, 2023, which indicates that more than half of people referred to emergency shelters in Waterloo Region were refugee claimants and asylum seekers, placing a strain on an already overburdened

system. Attached hereto and marked as **Exhibit "C"** to my affidavit is a copy of a CTV news article dated July 30, 2023, in which Sharon Livingston, the co-chair of Cambridge Shelter Corp. indicated Bridges was experiencing a spike in people accessing services.

12. Following the close of the 150 Main Street encampment, in September of 2023, approximately 30 people were evicted by the City of Cambridge from an encampment at Soper Park. Many of these people had moved here after they were evicted from the encampment at 150 Main Street. Attached hereto and marked as **Exhibit "D"** to my affidavit is a copy of a CBC article dated September 27, 2023, and **Exhibit "E"** to my affidavit is a copy of a Cambridge Today article dated September 28, 2023. The City of Cambridge spent \$11,000 on contractors alone for this eviction, attached hereto and marked as **Exhibit "F"** to my affidavit is a copy of a Record article dated October 6, 2023.

13. The closure of the Branchton encampment is just the next step in a series of continual displacements by the City of Cambridge and a targeted approach to penalize people experiencing homelessness and to limit their ability to access essential and life saving services.

AFFIRMED BEFORE ME in the)
City of Cambridge, this 25th day of)
March, 2024)
In the Regional Municipality of Waterloo)



ASHLEY ELIZABETH SCHUIITEMA



MARJORIE KNIGHT

A Commissioner, etc.,
Province of Ontario,
While a Barrister and Solicitor.
LSO # 68257G

THIS IS **EXHIBIT "A"** REFERRED TO
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A handwritten signature in black ink, appearing to read 'Ashley Elizabeth Schuitema', written over a horizontal line.

ASHLEY ELIZABETH SCHUIEMA

A Commissioner, etc.,
Province of Ontario,
While a Barrister and Solicitor.
LSO # 68257G

Kitchener-Waterloo

Concerns over outreach arise after Cambridge encampment cleared out

'If people scatter and camp, it becomes much more difficult,' says social worker

[Cameron Mahler](#) · CBC News · Posted: Sep 01, 2023 6:00 AM EDT | Last Updated: September 1, 2023



Cambridge's encampment was officially shut down on Aug. 24. The fences were shut and locked, belongings removed. (Cameron Mahler/CBC)

An encampment at 150 Main St. in Cambridge officially closed last week, but with its closure comes new concerns over outreach service delivery.¹⁴⁷

"They gave us pretty much a couple days and said we want you gone by this date," said Kevin Boutilier, who formerly lived at the encampment. "And then immediately after they bulldozed the whole area down."

Cambridge's encampment was officially shut down on Aug. 24, after the remaining two residents on the premises agreed to the region's proposal to move them.

Boutilier only recently became homeless, spending most of that time in the encampment — a large, empty parking lot behind 150 Main St.

Even with a full-time job in an upscale local restaurant, he said the cost of living became too much for him.

"Rent got too high and I couldn't keep up," said Boutilier.

Boutilier, along with some others who were kicked off the lot, carried his tent and belongings further down the street to a wooded area, near Soper Park in Cambridge.

He said their options were very limited.



Chris Barber recently moved to a wooded area near Soper Park in Cambridge. He said that the new encampment there had just as many residents as 150 Main St., if not more. (Cameron Mahler/CBC)

"Either be here or up in the woods somewhere else. Or outside of town."

Chris Barber, another man residing in the wooded area of Soper Park, said this new and growing encampment rivals the size of the one at 150 Main St.

"It's just as many people as there was at 150 Main, if not more," Barber said.

Region offered transitional housing and shelter beds

In order to get the encampment residents to move, officials with the region said they offered alternative housing options, which included transitional housing and shelter beds. Oftentimes, residents would have to be given an offer multiple times before saying yes, said Peter Sweeney, Waterloo region's commissioner of community services.

"We occasionally use motels to support people on a very short-term basis if we need¹⁴⁹ to," Sweeney said. "We have the new hybrid shelter on Erbs Road as an available option and then obviously, permanent housing that we're trying to support."

"I also know that some people left on their own accord. And it would be naive of me to suggest that there weren't still people choosing to live outside."

Sweeney said police and fire departments were on site for the closure. The fences were closed up and belongings cleared.

Issues with safety

The encampment was a safety issue, he said. Not only for those living adjacent to it, but for those living inside of it as well.

"There were multiple incidences of very violent, aggressive behaviour between residents. You know, the number of police calls that were made was very significant."

Concerns over fire safety, sanitary problems and the safety of the staff inside the building at 150 Main St. were among the concerns Sweeney brought up.

The encampment was the focus of a community safety town hall back in July, organized by Cambridge Mayor Jan Liggett.

Although the encampment was unsafe, Sweeney said that it did make it easier for outreach organizations to provide their services.

"It doesn't hold that because it's a little bit easier to support folks on one level, that we should be OK with very large, sometimes unmanageable, and often unsafe environments."

Pete McKechnie is the social support coordinator for Sanguen Health Centre, a not-for-profit community-based health care agency. They have a mobile health bus that

would stop off at the encampment every Tuesday.

"It is literally a physician's office on wheels," he said.

McKechnie echoed Sweeney in saying the closing of the encampment is going to make outreach services more difficult to provide.

"I think if you ask anybody that, they'll respond that way," he said. "We knew where to find folks who we're doing follow-up care for medical, as well as social support, housing, shelter, all those things."

'We knew where people were'

As a social worker, McKechnie played a role in helping encampment residents find housing. Decentralizing the population at 150 Main St. has also made notifying successful candidates that their housing option is available more difficult too.

"We knew where people were. If people scatter and camp, it becomes much more difficult."

McKechnie said that the services they provide require a "great deal of trust."

"It takes a lot of relationship building as a worker, as a healthcare provider, for an individual who's homeless ... to trust healthcare and the harm reduction that we provide."

McKechnie said that he heard of people, like Kevin Boutilier, who had moved from the encampment to the wooded area by Soper Park. His team has already visited the new site to formulate outreach plans.

Sanguen's mobile health bus makes stops at Cambridge Vineyard Christian Fellowship on Elgin Street North, just up the street from Soper Park. McKechnie also

said the bus will continue to make stops at 150 Main St., the site of the closed¹⁵¹ encampment.

"Anybody who's unsheltered and homeless within Cambridge, no matter where they are, we will work with them 100 per cent, and we will do our best to go to them."

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ASHLEY ELIZABETH SCHUIITEMA

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https://www.therecord.com/news/waterloo-region/waterloo-region-s-shelters-seeing-influx-of-refugee-claimants-seeking-help-as-last-resort/article_7df4d928-d9dc-5709-9027-2ed04950eaba.html

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WATERLOO REGION

Waterloo Region's shelters seeing influx of refugee claimants seeking help as 'last resort'

Cambridge Shelter Corporation helped more refugee claimants in July than in the previous 12 months, says executive director

By **Liz Monteiro** Record Reporter

Aug 18, 2023

Article was updated Aug 18, 2023



Wayne Paddick, executive director of the Cambridge Shelter Corporation, stands Thursday in a sleeping area at The Bridges in Cambridge. Local shelters are housing many more refugee claimants.
Mathew McCarthy / Waterloo Region Record

WATERLOO REGION — The region’s shelter system is being inundated with refugee claimants and asylum seekers who have nowhere to live and are staying in shelters as a last resort.

“The influx of refugees into this community and our ability to support them and provide housing is under significant strain,” Peter Sweeney, commissioner of community services, told councillors at a regional committee meeting earlier this week.

“We are seeing folks accessing the shelter system as a last resort, and it’s not the most appropriate space,” Sweeney said.

Last month, more than half of people referred to emergency shelters in the region were refugee claimants and asylum seekers, regional Chair Karen Redman said in a letter written to the federal immigration minister this week reinforcing the need to help.

The region is asking for \$48 million from the federal government to support for claimants and newcomers. The money will help shelters cope with the demand and create a mobile team of shelter support workers and a dedicated settlement centre in the region.

“We need money and support for our local agencies through the federal government because there aren’t supports in place for asylum seekers,” Redman said in an interview. Those asylum seekers are in a far different situation than government-sponsored refugees, who are funded by the government for up to a year, and immigrants who can access local supports paid for by the federal government.

The growing number of refugee claimants in emergency shelter is putting pressure on an already strained system, said Tara Bedard, executive director of the region’s Immigration Partnership.

“The shelter system is not set up to help people through the asylum claims process, and nor should it be,” Bedard said in an interview.

Refugee claimants have been staying in shelters locally and in other cities, including border areas such as the Niagara Region and Windsor, where “thousands” of refugee claimants are living, Sweeney told councillors.

Earlier this summer, Toronto’s shelters were full and refugee claimants were sleeping on the streets. Many claimants had no other choice because they couldn’t afford a place to live. In Toronto, refugees account for a third of the city’s 9,000 shelter spaces.

In response to the crisis, the federal government announced one-time new funding of \$212 million to provinces and municipalities to help pay for interim housing for asylum claimants. Toronto received money and now the region is asking for some of it too.

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OFFICE OF THE REGIONAL CHAIR
Karen Redman

Regional Municipality of Waterloo

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The Honourable Marc Miller
Minister of Immigration, Refugees and Citizenship
House of Commons
Ottawa, ON K1A 0A6

August 15, 2023

Dear Minister Miller,

Firstly, congratulations on your appointment as Minister of Immigration, Refugees and Citizenship. This is an enormously important portfolio for the future of Canada and the future of Waterloo Region. Our region has long been a major settlement destination for newcomers and they are an important part of the community we have built and are building today. We are fortunate to have a broad range of local leaders this space, including our Waterloo Region Immigration Partnership, partner municipalities, non-profit organizations, the business community, post-secondary institutions, and your local MP colleagues.

While there is a strong foundation of settlement and the future remains bright, we are currently experiencing similar pressures to other destinations across Southern Ontario. Over the course of 2023, the Waterloo Region's emergency shelters have experienced a 33% increase in the number of refugees and asylum seekers accessing emergency shelters, while many more seek access but are able to be diverted to other spaces. In July 2023, 52% of individuals referred to emergency shelters in our region were refugees and asylum seekers. Currently, refugee and asylum seekers occupy 10% of our community's emergency shelter beds and 28% of hotel rooms rented for families, with the number of days spent in emergency shelter reaching upwards of 75 days.

Waterloo Region's emergency shelter system is approaching maximum capacity. Several Emergency Shelters are full on a nightly basis, and the average shelter occupancy across the community is 83%. With no dedicated facility to support families experiencing homelessness, local partners use hotel and motel spaces to temporarily support families experiencing homelessness. In July 2023 an average of 74 individuals were provided with temporary shelter/accommodations per night in hotel rooms rented for families experiencing homelessness. The Regional Municipality of Waterloo is currently spending \$19M annually on emergency shelters.

In July, the Cambridge Shelter Corporation had more refugees seeking refuge than it had the previous 12 months. Some of them have come from Nigeria, Kenya and Mexico.

Currently, there are 21 refugee claimants staying at the Cambridge shelter, and the agency has served more than 30 men all together, executive director Wayne Paddick said in an interview.

Shelter staff are learning quickly how to help refugees, as agencies with refugee expertise such as Compass Refugee Centre in Kitchener and the Kitchener-Waterloo Multicultural Centre are also strained dealing with their current clients, Paddick said.

“This has hit us all by storm,” he said. “They are all great guys and we want to help them, but it is time-consuming.”

Each intake takes about four hours, putting a strain on staff resources as employees get up to speed with the specialized process, Paddick said.

“Some of the other work that we’ve been doing has been kind of put on the back burner,” he said.

The shelter is fortunate to have beds available for all coming to the shelter, Paddick said. The Cambridge Corporation has 85 beds and about 65 of them are occupied on any given night, he said.

“We haven’t had to turn away any refugees or community members at this time,” Paddick said. “There is still room at the inn.”

Across the region, 10 per cent of those currently in the shelter system — about 55 people — are refugee claimants and asylum seekers, Sweeney told councillors.

RELATED STORIES

More than 2,000 refugee claimants in Waterloo Region wanting permanent residency

Almost half of the families the YW Kitchener-Waterloo helped last week were refugees — seven of 16 families. They were seeking emergency shelter and the YW housed them at a Waterloo hotel.

In April, the region’s shelter system helped five refugee claimants. By July, that jumped to 57 individuals, he said.

Regional council should be given a “thorough update” about what is happening to deal with the influx of asylum seekers in shelters, Coun. Doug Craig told regional staff.

Regional housing staff are meeting regularly with settlement agencies such as the¹⁵⁸ Compass Refugee Centre and the Kitchener-Waterloo Multicultural Centre to meet the demand, Sweeney said. Compass said there are 2,000 refugee claimants living in the region who are seeking permanent residency.

“It’s a system that is fractured, and not only from a housing perspective, but also from a health care perspective and a translation perspective,” Sweeney told councillors.



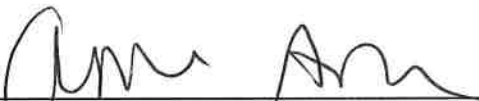
Liz Monteiro is a Waterloo-based reporter focusing on crime for *The Record*.

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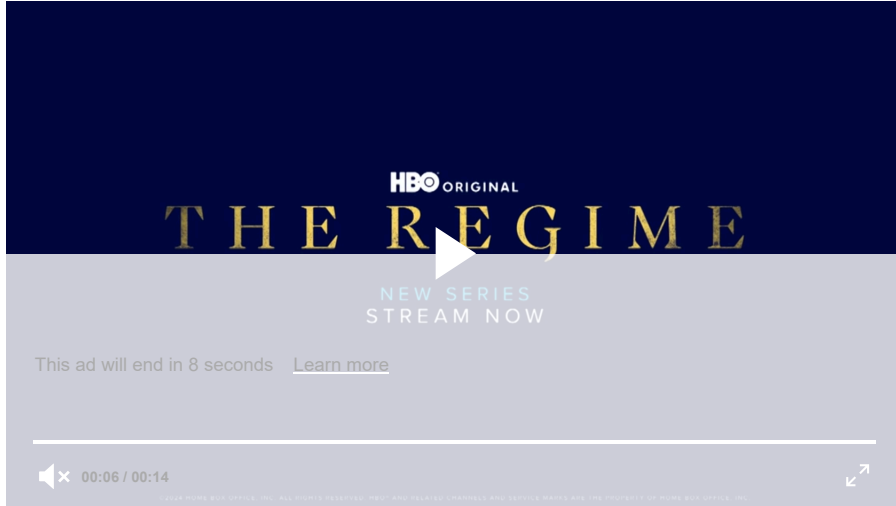


ASHLEY ELIZABETH SCHUIEMA

A Commissioner, etc.,
Province of Ontario,
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[KITCHENER](#) | News

'The worst it's ever been': Cambridge homeless shelter calling for more support



Hannah Schmidt
CTV News Kitchener Videographer
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Published July 30, 2023 5:59 p.m. EDT
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A Cambridge homeless shelter is calling for support from the community after seeing a spike in those experiencing homelessness using their supports. The Bridges – run by the Cambridge Shelter Corp. – is seeing a sharp increase in people experiencing homelessness in 2023.

“We’re seeing an increase, the worst we’ve ever seen,” said Sharon Livingstone, co-chair of the Cambridge Shelter Corp. “The number of older adults we are seeing who are being evicted often is because a partner dies or goes into long-term care, they no longer can afford the rent or they’re evicted and the reality is it’s also more difficult to rehouse people.”

Support worker Joel Baker says the high costs of living is driving up the demand for social services across Waterloo region.

“With the amount of people, there could potentially be more services that the region could use,” he said.

The Bridges say the need community support now more than ever, as they look to serve over 70,000 meals this year. So far, they have served just over 35,000.

The organization is now asking for the public’s help to reach that goal.

“We’re about 75 per cent funded by the region and so we need money of course and we look to the community to help with that,” said Livingstone.

The most [recent data from the Region of Waterloo](#) estimates over 1,000 people are experiencing homelessness across the region, including hundreds of people living with chronic homelessness.

The region predicts:

- 412 people are living rough
- 335 people are experiencing hidden homelessness
- 191 people are in emergency shelters
- 84 people are in transitional housing
- 63 people are in institutions (hospital, police custody, Women’s Crisis Services)

“Our problem is two-fold, we’ve had an increase in evictions and people being out on the streets for whatever reasons and sometimes folks have mental health and addiction issues which haven’t been treated and they prefer not to be in shelters or not to be inside our agency’s doors,” explained Livingstone.

Food and clothing donations can be dropped off at The Bridges or money can be donated directly on the Cambridge Shelter Corp’s [website](#).

RELATED IMAGES

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The Bridges in Cambridge is seen on July 30, 2023. (Hannah Schmidt/CTV News)

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Kitchener-Waterloo

City begins enforcing bylaws at encampment in Cambridge's Soper Park

Exec. dir. of ACCKWA feels the move could harm those experiencing homelessness

CBC News · Posted: Sep 27, 2023 6:00 AM EDT | Last Updated: September 27, 2023



Personal items were collected in piles -- seemingly from encampment residents -- near the road in Cambridge's Soper Park on Wednesday. (James Chaarani/CBC)

On Wednesday morning, the City of Cambridge began enforcing its bylaws at an¹⁶⁵ encampment at Cambridge's Soper Park. This comes after a notice had been posted in the park indicating that those who "dwell, camp or reside in a park" could face charges if they don't vacate under the Trespass to Property Act.

Waterloo Regional Police Service (WRPS), Canadian Pacific Police Service and John Mattocks, Cambridge's manager of municipal bylaw compliance, were present Wednesday.



Some WRPS officers at Soper Park on Wednesday. (James Chaarani/CBC)

"So we've been working with these folks since early August to let them know that they wouldn't be able to stay here," said Mattocks.

"And last week we did put a reminder notice that they still couldn't be staying here, and today we're here to ensure compliance with the notice and our bylaws."

Personal items were collected in piles — seemingly from residents — and were laid out by the road with reports by one advocate on the scene who said that some residents had already been moved, however the city said this wasn't the case.

"No residents on city property were removed from the site," said city spokesperson,¹⁶⁶ Allison Jones, in an email statement. "Work is still underway to assist the [four] individuals on city property as they prepare to move on to their alternative housing options."

City property vs private property

Mattocks said that their efforts Wednesday only applied to encampment residents on city property.

"This is not city property," he said, standing near a small encampment which still had a handful of residents on the outskirts of the park near the railway. "So this area belongs to the [Canadian Pacific Kansas City]."

"We have a couple of spots on city property and our expectation today is we'll ensure compliance with our notice and our bylaws."



Corporate Services
Municipal By-law Compliance
50 Dickson Street
Cambridge, ON, N1R 5W8
Tel: (519) 623-1340 ext. 7907
E-mail: bylaw@cambridge.ca

To whom it may concern,

Please be advised that due to serious concerns about your conduct and safety on City lands, you are hereby notified that the behaviour exhibited at City properties namely, Soper Park is prohibited under the City of Cambridge Parks By-law No. 162-10. Specifically, you engaged in the following unacceptable and prohibited activities as set out in section 3 of the By-law:

- Dwell, camp or reside in a park, without a permit from the municipality or the consent in writing of the Director (contrary to sub. 3(m));
- Place, install or erect any temporary or permanent structure in a park (contrary to sub. 3(n)).

Failure to comply with direction issued pursuant to the *Trespass to Property Act* may result in charges being laid against you.

This will further confirm the authority of the Waterloo Regional Police Service to act as agent for The Corporation of the City of Cambridge to give effect to such notice of trespass.

If you have any questions regarding the foregoing, please contact Municipal By-law Compliance at bylaw@cambridge.ca or 519-623-1340 extension 7907.

Yours truly,

THE CORPORATION OF THE CITY OF CAMBRIDGE

cc. Waterloo Regional Police Service

This notice was posted by the City of Cambridge warning residents of Soper Park about the consequences of making the city park their home. (Marjorie Knight/X.com)

[There were reports](#) that some of the Soper Park residents had congregated at the site following their removal from the former encampment at 150 Main St. last month.

"The priority has been to connect [residents] with safer, sustainable, and healthier housing alternatives, and ensure they were aware that remaining on the site is prohibited under the parks bylaw," said Jones.

"Recently, the city issued a notice to these individuals, reminding them of their requirement to vacate the area. Those who fail to do so, will be in violation of the Trespass to Property Act and may be arrested or receive a fine."

- [Concerns over outreach arise after Cambridge encampment cleared out](#)
- [Region approves lease for drop-in hub for people who are homeless in Cambridge](#)

'It's heartbreaking'

Amanda Speed, who was a resident of 150 Main Street, and who now visits Soper Park daily, was saddened by the scene.

"It's heartbreaking watching this happen again and again and again," said Speed, who is experiencing homelessness, continuing to live out of her trailer.

"Where are they going? They're just going to go to another place and they're going to be complained about there and they're going to have to move again in a month or so."

Concerns about displaced residents

The executive director of ACCKWA, Ruth Cameron, is concerned about displacing¹⁶⁹ people experiencing homelessness regularly and said that when done, it makes it difficult to get them the services that they need.

"It also makes it challenging for individuals to remain connected within their communities of trusted individuals who are experiencing the same hardships that they are, who look out for one another to try and increase their safety and well-being," Cameron said.



Ruth Cameron, the executive director of ACCKWA, believes that repeatedly relocating encampment residents can be harmful. (Paula Duhatschek/CBC)

ACCKWA does outreach to this population alongside Sanguen Health Centre, Cameron explained.

"It means that the teams at the organizations are spending more of their time on finding individuals, and less of the time on the actual specific supports that we can

offer to those individuals," she said.

Cameron said that they don't see sanctioned encampments as the "end solution," but as a level of "stability" until a proper solution is found, and questions where the municipality expects these people to go instead.

"The city could refrain from constant displacement of the individuals," she said. "It is very dehumanizing, but it is also very dangerous. These are people who, needless to say, when someone is experiencing this level of marginalization, it has an impact on their health."

With files from Carmen Groleau, Cameron Mahler, James Chaarani

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THIS IS **EXHIBIT "E"** REFERRED TO
IN THE AFFIDAVIT OF MARJORIE KNIGHT
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ASHLEY ELIZABETH SCHUIITEMA

A Commissioner, etc.,
Province of Ontario,
While a Barrister and Solicitor.
LSO # 68257G

Cleanup underway at vacated Soper Park encampment

CambridgeToday Staff
Sep 28, 2023 9:08 AM



2 / 7 A worker watches as a small bulldozer emerges from the wooded area near Soper Park where a company contracted by CP rail is clearing out an abandoned encampment. | Joe McGinty/CambridgeToday

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00:04:36

The trail between Elgin Street and Soper Park has been closed temporarily to allow a contractor with a bulldozer, working with Canadian Pacific Kansas City (CPKC) Rail, to clear out what remains of an encampment on land owned by the company near the park.

Contractors hired by the City of Cambridge manually removed garbage left behind by about 50¹⁷³ residents of the encampment who were forced out after they were given a midnight deadline yesterday.

CPCCK police officer, Shaz Shah tells CambridgeToday that all of the residents have vacated the premises and extensive clean up of the area is underway.

"We didn't have any incidents today or yesterday, but we needed to make sure that the people living in the park were able to vacate according to the notice given to them," Shah said.

That deadline followed an earlier deadline issued by the city that informed residents of the camp they would face fines or arrest for violating city bylaws including trespassing.

Shah notes the reasoning for the railway company removing the camps is due to safety concerns for the public and those living on the property.

"We were getting some complaints from locals since halfway through August, and we worked with the city, regional police to ensure they were given other options to stay," said the CPCCK officer.

The railway is conducting maintenance on the tracks above the camp and said if a train were to derail and land on the camp, it would be a disaster.

"Beyond the trespassing and bylaw infractions, it just wasn't safe to have a camp at this location."



Social workers from across Waterloo region assisted residents with the cleanup yesterday¹⁷⁴ and were able to find alternative space for many. It's unknown where some residents of the encampment ended up.

In a regional council meeting last night, a few delegates including former Cambridge NDP candidate Marjorie Knight, active outreach workers and an advocate for the unhoused population got up to speak about the eviction at Soper Park and how unhoused individuals are treated as numbers and statistics, rather than human beings.

"I am concerned over the homeless and the continued evictions that are happening in Cambridge," Knight said. "I want you to know that there is a face to all these people, they are not an abstract or just the homeless; they are people, people like me."

Knight told her story about coming to Canada and living rough on the streets. Being homeless was the worst time of her life, she said. It was a time when her family was falling apart and when she felt ostracized by society due to her housing situation.

"The absolute hatred that I see extended towards people, only because they are homeless, is wrong. And when you make decisions to what you are going to do for or with homeless people, I want you to see my face."

Laura Pin, a professor from Wilfrid Laurier University and an expert in homelessness and housing policy, spoke of her concern over the Soper Park eviction and how the closure of 150 Main made the park camp grow to nearly 50 individuals.

Pin also served as an expert witness in the case against the Region of Waterloo that prevented the municipality from evicting a large encampment in Kitchener.

"It's painfully clear to me and to many others who have been on the ground there that the closure of the encampment at 150 Main was not due to people securing housing," Pin said.

She explained that she was unable to find anyone from the Soper Park encampment who was given options for shelters or housing and said no options were presented for them to legally set up camp.

The eviction of this camp and the closure of 150 Main St. further scatters the unhoused population throughout the city, making it harder for social workers to offer services and the necessities for day-to-day life, Pin said.

"These types of eviction notices have life or death consequences and the same cycles are repeating," she said. "Seeing a group of people living unsheltered in poverty is an uncomfortable

experience, but the people who are made the most uncomfortable by this experience are those ¹⁷⁵ living unsheltered."

Pin called on regional council to stop all unconstitutional evictions on municipal land and to direct staff to re-open land at 150 Main St. for tenting or alternately find a space on regional property that would be suitable for tenting in Cambridge.

Cleanup crews remain on site and the path connecting the two halves of Elgin Street North, which will remain closed until work is completed.

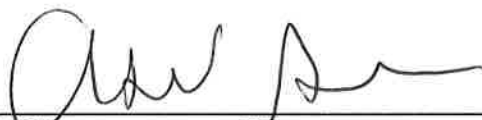
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A handwritten signature in black ink, appearing to read 'Ashley Schuitema', written over a horizontal line.

ASHLEY ELIZABETH SCHUITEMA

A Commissioner, etc.,
Province of Ontario,
While a Barrister and Solicitor.
LSO # 68257G

https://www.therecord.com/news/waterloo-region/cambridge-encampments-i-don-t-see-any-short-term-solution/article__e51eadcf-dd86-52f2-b67c-5c32e61e5886.html

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WATERLOO REGION

Cambridge encampments: 'I don't see any short-term solution'

The City of Cambridge spent about \$11,000 on contractors to clean up left-behind belongings at the Soper Park encampment when it was evicted last week

By **Paige Desmond** Record Reporter

Oct 6, 2023

Article was updated Feb 23, 2024



Brian Kitchen, left, and his sons John and Dan pack their belongings in the Soper Park encampment on Sept. 26. Mathew McCarthy / Waterloo Region Record

CAMBRIDGE — The City of Cambridge spent just under \$11,000 on contractors to remove left-behind belongings after the clearing of the Soper Park unsheltered camp last week.

It doesn't make sense to keep moving people at a cost to taxpayers, said Cambridge Coun. Ross Earnshaw in an interview this week.

“I don't see any short-term solution,” Earnshaw said. “The other observation I would make is that the cost incurred by the city for its compliance officers and subcontractors is just the tip of the iceberg.”

Earnshaw pointed to the health care costs in ambulances, paramedics, law enforcement and other agencies that respond to assist people living in encampments.

“The people who accuse me of taking a position that is compassionate and sympathetic but pays no attention to the costs on the taxpayers are missing the fact that the costs of the present approach to this far exceed the costs of addressing it with housing, mental health and rehabilitation facilities that would address the situation more effectively and ultimately at far less costs.

“That’s a very hard lesson to get across.”

Coun. Scott Hamilton also said evictions aren’t a solution.

“It is not sustainable because as we’re seeing, solutions like this are just a temporary Band-Aid and we’re dealing with people, we’re dealing with human beings ... so we need to find more compassionate solutions to the encampment crisis and that depends on all levels of government stepping up,” he said.

Last week about 30 people were evicted from land owned by Canadian Pacific Kansas City Rail and from the adjacent city-owned Soper Park. The city said it received 39 complaints about the camp through its online reporting tool as well as 11 fire and medical calls to the fire department.

The people living in the camp — several for months — went to various locations: two went to the Region of Waterloo’s managed encampment at 1001 Erbs Rd. the week before and one accepted a shelter bed at The Bridges in Galt. The rest have scattered throughout the city.

Brian Kitchen and his two sons were among those evicted.

Kitchen said what people need is an unused industrial building somewhere in the city to stay where they can keep warm, have some stability instead of moving place to place and protect their belongings.

Bureaucrats should be listening to the people experiencing homelessness about what they need, not forcing decisions from the top down, he said.

“They’re not doing what we need, they’re doing what they think that they want so that they feel better about doing nothing that we need,” he said. “That’s the bottom line.”

Earnshaw said he doesn’t know what the solution is.

Other municipalities like Hamilton and London have permitted small camps in city parks and other areas or acquired hotels and motels to serve as shelter spaces.

“These are options that I suppose are available to all municipalities, but none of them are under consideration at Cambridge so far as I’m aware,” he said.

One suggestion is to build a managed encampment in Cambridge. Regional staff are expected to pitch options to regional council for addressing the unsheltered crisis in November. It’s expected that a managed encampment in Cambridge will be among the options.

RELATED STORIES

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Article was updated Mar 1, 2024

The region oversees homelessness and housing for all four cities and the three townships.

But it takes several months to build a managed encampment, and winter is coming.

Hamilton supports the idea of a managed encampment in Cambridge and said council needs to talk about solutions.

“Cambridge city council, we need to sit down and put our heads together and say, ‘What can we do?’ That conversation hasn’t come yet, but it absolutely has to,” Hamilton said.



Paige Desmond covers *Waterloo City Hall* for the *Waterloo Region Record*.

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**MICHAEL NANOS AND JOSEPH
MICALLEF**
Plaintiffs

**THE CORPORATION OF THE CITY OF
CAMBRIDGE**
Defendant

Court File No.: CV-24- 00000526-0000

**ONTARIO
SUPERIOR COURT OF JUSTICE**

Proceeding commenced at KITCHENER

AFFIDAVIT OF MARJORIE KNIGHT

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Lawyers for the Plaintiffs, Michael Nanos and
Joseph Micallef

TAB 5

Court File No. CV-24- 00000526-0000

**ONTARIO
SUPERIOR COURT OF JUSTICE**

B E T W E E N:

MICHAEL NANOS and JOSEPH MICALLEF

Plaintiffs

and

THE CORPORATION OF THE CITY OF CAMBRIDGE

Defendant

AFFIDAVIT OF SHAWNA BATOR

I, **SHAWNA BATOR**, of the Township of North Dumfries, in the Province of Ontario,

AFFIRM AND SAY:

1. I have personal knowledge with respect to the facts set out below, except where stated otherwise. Where the information is not based on my personal knowledge, it is based upon information provided by others which I believe to be credible and true.

BACKGROUND AND EXPERIENCE

2. I have worked and/or volunteered in some capacity in the social work and community work field since my graduation as a Social Service Worker (SSW) from college in 2007. In 2007, I accepted a role as a Street Outreach Worker in Kitchener with a project called Between a Rock and a Hard Place, where I provided support to female street-level sex trade workers. I have also worked as a Youth Support Worker at Argus House, where I provided support to vulnerable and unhoused youth in Cambridge. I have just recently left my role as a board member at Trinity Community Table in

Cambridge, where I volunteered for approximately 10 years providing meal service to individuals experiencing poverty or homelessness.

3. From approximately October 2021 to October 2022, I worked as a Street Outreach Worker at the Cambridge Food Bank. In this role, I supported unhoused people in the City of Cambridge as a liaison between individuals and community services/resources, food, medical services, housing support, and shelter support.
4. While I am no longer registered with the Ontario College of Social Workers and Social Service Workers (OCSWSSW) and I am also no longer practicing as an SSW, I continue to offer support in the social work and community work field. I am currently a certified and registered 500-Hour Yoga Teacher and Trauma Sensitive Mindfulness Practitioner. I facilitate yoga classes at 150 Main Street in Cambridge for affiliates of the MACS drop-in centre, their peer support outreach team, and people experiencing homelessness.

ISSUES ACCESSING SHELTER IN CAMBRIDGE

5. As a Street Outreach Worker, I helped unhoused people in Cambridge access the Bridges shelter and other shelters across the Waterloo Region. In my experience, there are many barriers to accessing shelter space at Bridges. Many people are banned or restricted from Bridges for different reasons and for different spans of time. I had worked with one person that was banned from Bridges because their belongings were stolen from them by another shelter resident. When they asked for their belongings to be returned and asked staff to check the security camera, they were asked to leave the shelter. They were then banned from the shelter. People who are asked to leave the shelter have nowhere else to go. Some people have a ban for life

making it impossible for them to access shelter in Cambridge, as Bridges is the only shelter option.

6. There is a lack of available and accessible shelter space in Cambridge. Even if someone does not have a ban at a shelter and are willing to go, shelters are almost always full. The Bridges shelter was at full capacity almost every time we have called First Connect, especially in the winter. Even emergency drop-ins are full. All the housing lists are full. I worked with one man who was on the housing list for 9 years. This was the case for many people.
7. Even if there is space at Bridges, a lot of the responses we received from individuals were "I would rather die than go to Bridges." I have witnessed people who were willing to freeze to death rather than access the only shelter in Cambridge. This was a prevalent response and a pattern that we saw often. Many people do not feel safe there, have had bad experiences and refuse to return.
8. People have reported experiencing racism, homophobia, stigmatization, and discrimination at Bridges. Many people have talked about experiencing poor treatment from shelter staff, including feeling like they were treated like garbage. I have been advised by racialized members of the unhoused community about instances of racism they have experienced at Bridges.
9. There are many people experiencing homelessness that do not speak English and struggle to access services. As outreach workers, we would try to access translators to communicate with folks on the streets. I am not aware of Bridges providing translators to assist those that do not speak English.

10. The experience of homelessness is completely different depending on who you are. Women and LGBTQ folks are more vulnerable to violence on the streets. There are many unhoused women in Cambridge and no place for women here. Many women sleep during the day because there is more potential for sexual violence at night. Women are constantly living in survival mode because of the potential for violence or death at any minute. They could die of anything – dehydration, infection, starvation, weather, violence, or accidents, and many do.
11. There are no shelters for women in Cambridge. Women must leave Cambridge to go to Kitchener for shelter. But a lot of women have children in foster care and refuse to leave Cambridge because they do not want to leave their children who are in care in Cambridge. In these cases, there is nowhere else for them to go.
12. There are no shelters for youth in Cambridge. Minors are not allowed in Bridges. There is a lot of homelessness youth in Cambridge. We had to send youth to oneROOF Youth Services in Kitchener. If they did not want to leave Cambridge, they had nowhere else to go.
13. There are no pets allowed at Bridges. And if you are in a relationship, you are not allowed to be together and stay together as a couple in Bridges.
14. If people are unable or unwilling to access Bridges, they are told to go to Kitchener for shelter. First Connect will sometimes pay for a cab or bus ticket for the individual to get to Kitchener. But there are still barriers to accessing shelter space in Kitchener. Shelters in Kitchener are usually full. Some people may also have a restriction or ban at the shelters in Kitchener. One time, First Connect sent a woman to Kitchener from Cambridge. Somehow, First Connect missed a shelter restriction that the woman had

in Kitchener. The woman traveled to Kitchener and got stuck there. She had to find her way back to Cambridge on her own. People may also have other personal reasons for wanting to stay in Cambridge. Some people may have a restraining order in Kitchener. They might have children or parents in Cambridge.

LIMITED DAYTIME SHELTER OPTIONS IN CAMBRIDGE

15. There is almost nowhere for unhoused people to go during the daytime in Cambridge. During the day, some local churches offer meal programs a few times a week. Trinity Community Table offers food and meal programs. "The Vineyard" [Cambridge Vineyard Christian Fellowship] is the only place in the city for unhoused people to go if they want to take a shower. 150 Main Street in Cambridge has a drop-in for people to get snacks and access services, but it gets very busy.

HARMS WITH ENCAMPMENT EVICTIONS

16. Encampments are home for many people and it is their home no matter what it looks like to other people. When people are evicted, they lose important belongings. I know people who have lost their mother's ring, the only picture of their children, and valuable artwork as a result of being evicted from their tent. A lot of people feel defeated because they are constantly displaced and living in survival mode.

17. When unhoused individuals are moved around, they experience reoccurring trauma. Unhoused people are constantly uprooted in Cambridge and re-traumatized by continuous encampment evictions. People are so afraid of being uprooted again that they try to keep their locations as secretive as possible. Some move further to the outskirts of town or deep into the woods/forested pockets of Cambridge to avoid being found. There were some encampments that we, outreach workers, could not even go

to unless one of us already had a connection with one of the residents. I worked with a man who had not talked to anyone for 6 months. He wanted to be isolated and hidden because he knew that if he let anyone know he was there – even other unhoused people – there would be a chance of him getting evicted again. This isolation had a significant impact on his physical and mental health.

18. When people go deeper into the forest, it increases harm. Not only are their lives at jeopardy because of the weather, but the risk of dehydration and starvation increases the further they are forced into the woods or the outskirts of town because it becomes much harder for them to access services and resources. They don't have money for a bus ticket. So unless they have a bike, they can't get anywhere. They have to walk for hours to access food and water because there are no services around them.

19. Ticks are a real issue when living outdoors. People get bitten by ticks and many have the potential to contract various tick-borne diseases. As outreach workers, we would distribute information and teach people how to remove ticks from their body. People living homeless outdoors also often get cuts and infections from plants and trees. They have limited ability to cleanse wounds or access medical services when they are living out in the woods.

20. People are at risk of death when they are pushed into these areas of the city. There are missing and potentially deceased homeless people who are not found because they are so isolated.

BENEFITS OF ENCAMPMENTS

21. There is safety in numbers. That is why encampments are better. Someone is always looking out for you. People come together and form a community. They share

resources. They share food and water. They look out for each other. People prefer living with other people in encampments because even if they are in the middle of a forest, they know they are not alone. They can rely on each other for getting food and resources.

22. The community in Cambridge does not care about people experiencing homelessness and there are many stigmas associated with homelessness in Cambridge. The homeless are viewed as “addicts” and “beggars”. But as a front-line worker, I saw so many different people experiencing homelessness for a variety of different issues. I once helped a 91-year-old woman living in her car. There are many veterans experiencing PTSD. There are a lot of seniors being displaced and experiencing homelessness. But the stigma is thriving in Cambridge.

23. I make this affidavit in support of a motion for an interim injunction and for no other purpose.

AFFIRMED BEFORE ME in the)
City of Kitchener, this 25th day of)
March, 2024)
In the Regional Municipality of Waterloo)





SHAWNA BATOR

SHANNON KATHLEEN DOWN,
a Commissioner, etc.,
Province of Ontario,
while a Barrister and Solicitor.
LSO #43894D

**MICHAEL NANOS AND JOSEPH
MICALLEF**
Plaintiffs

**THE CORPORATION OF THE CITY OF
CAMBRIDGE**
Defendant

Court File No.: CV-24- 00000526-0000

**ONTARIO
SUPERIOR COURT OF JUSTICE**

Proceeding commenced at KITCHENER

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Lawyers for the Plaintiffs, Michael Nanos and
Joseph Micallef

TAB 6

Court File No. CV-24- 00000526-0000

**ONTARIO
SUPERIOR COURT OF JUSTICE**

B E T W E E N:

MICHAEL NANOS and JOSEPH MICALLEF

Plaintiffs

and

THE CORPORATION OF THE CITY OF CAMBRIDGE

Defendant

AFFIDAVIT OF LESLEY CROMPTON

I, **LESLEY CROMPTON**, of the City of Kitchener, in the Province of Ontario, AFFIRM AS FOLLOWS:

1. I have personal knowledge with respect to the facts set out below, except where stated otherwise. Where the information is not based on my personal knowledge, it is based upon information provided by others which I believe to be credible and true.
2. I am a founding member of the Unsheltered Campaign, an organization that was initiated to support people experiencing homelessness during the pandemic. The Unsheltered Campaign provides direct services to people experiencing homelessness in Waterloo Region including food, tents, sleeping bags, tarps and winter clothing. We provide these services through donations and cash donations from the community.

3. I am employed as a Professor at Conestoga College where I teach Information Technology (IT) Business Analysis. I have been in this role since January of 2023. I also facilitate a free tax clinic for low income people in the Region of Waterloo in partnership with the Canada Revenue Agency, which I have done for six years. I am also a partner with the Social Development Centre in consultation with the Region of Waterloo on the Plan to End Chronic Homelessness.
4. On February 27, 2024, I became aware through discussion with Stephanie Mancini, the Co-Director of the Working Centre, that the University Avenue (“UA”) Interim Housing located at 139 University Avenue in Waterloo, operated by Services and Housing in the Province (“SHIP”), would be closing for renovations. This location has 80 transitional housing beds and is part of the Region of Waterloo’s emergency shelter system. This location provides services to women, men and couples. It is my understanding through discussion, that many of the residents at UA were being moved from this location while renovations take place.
5. On February 27, 2024, I was notified by Stephanie Mancini, the Co-Director of the Working Centre, that the Region of Waterloo had directed the Working Centre to freeze any intakes at the Working Centre shelters while renovations took place the UA in order to make room for some of the tenants from UA.
6. The Working Centre operates two emergency shelters in the Region of Waterloo:
 1. The King Street Emergency Shelter, located at 1668 King Street East in Kitchener, which has capacity for 70, and
 2. The Erb Road Outdoor Shelter, located at 1001 Erbs Road in Waterloo, which has capacity for 50 people.

7. It is my understanding that both the King Street and the Erb Road shelters frequently operate at, or above, capacity, however with this recent freeze on any new intakes, no one experiencing homelessness in the Region will be able to access these emergency shelters unless they were transitioning there from UA.
8. On March 20, 2024, I had a telephone call with Chris McEvoy, Manager of Housing Policy & Homelessness Prevention at the Region of Waterloo, who confirmed the closing of UA for renovations and the freeze on new intakes at the Working Centre shelters. The Region was not able to provide a timeline for the length of the renovations at UA. During my conversation with Chris McEvoy, he acknowledged that there is no shelter space for people to go to in the Region and acknowledged that people may be forced to live outside.
9. I swear this affidavit in support of the Notice of Motion and for no other or improper purpose.

AFFIRMED BEFORE ME in the)
 City of Kitchener, this 25th day of)
 March, 2024)
 In the Regional Municipality of Waterloo)



A Commissioner, etc.



LESLEY CROMPTON

SHANNON KATHLEEN DOWN,
 a Commissioner, etc.,
 Province of Ontario,
 while a Barrister and Solicitor.
 LSO #43894D

**MICHAEL NANOS AND JOSEPH
MICALLEF**
Plaintiffs

**THE CORPORATION OF THE CITY OF
CAMBRIDGE**
Defendant

Court File No.: CV-24- 00000526-0000

**ONTARIO
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Proceeding commenced at KITCHENER

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Lawyers for the Plaintiffs, Michael Nanos and
Joseph Micallef

**MICHAEL NANOS AND JOSEPH
MICALLEF**
Plaintiffs

**THE CORPORATION OF THE CITY OF
CAMBRIDGE**
Defendant

Court File No.: CV-24- 00000526-0000

**ONTARIO
SUPERIOR COURT OF JUSTICE**

Proceeding commenced at KITCHENER

MOTION RECORD - VOLUME II

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Lawyers for the Plaintiffs, Michael Nanos and
Joseph Micallef