

Court File No.: CV-25-00000750-0000

**ONTARIO  
SUPERIOR COURT OF JUSTICE**

BETWEEN:

**THE REGIONAL MUNICIPALITY OF WATERLOO**

Applicants

- and -

**PERSONS UNKNOWN AND TO BE ASCERTAINED**

Respondents

APPLICATION UNDER Rule 14.05 of the *Rules of Civil Procedure*

**RESPONDING RECORD**

**VOLUME 3 OF 4**

**WATERLOO REGION COMMUNITY LEGAL SERVICES**  
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Lawyers for the Respondents

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The Regional Municipality of Waterloo

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Lawyers for the Mental Health Legal  
Committee (Intervener)

July 9, 2025

**ONTARIO  
SUPERIOR COURT OF JUSTICE**

B E T W E E N:

THE REGIONAL MUNICIPALITY OF WATERLOO

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**RESPONDING RECORD**

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**TAB 29**

**ONTARIO**  
**SUPERIOR COURT OF JUSTICE**

B E T W E E N:

THE REGIONAL MUNICIPALITY OF WATERLOO

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APPLICATION UNDER Rule 14.05 of the *Rules of Civil Procedure*

**AFFIDAVIT OF JULIE LUKEZIC**

I, Julie Lukezic, of the City of Kitchener, in the Province of Ontario, AFFIRM AND SAY:

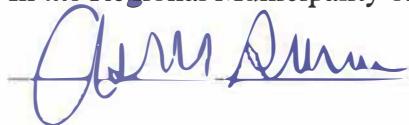
1. I have personal knowledge with respect to the facts set out below, except where stated otherwise. Where the information is not based on my personal knowledge, it is based upon information provided by others which I believe to be credible and true.

2. I am a volunteer with Going Mobile KW, an organization that provides food to people experiencing homelessness and food insecurity in Kitchener. I have volunteered with Going Mobile KW for approximately three years.
3. Going Mobile KW works with Tiny Home Takeout, a local organization that prepares food for people experiencing food insecurity in Waterloo Region. Tiny Home Takeout will make extra food that Going Mobile KW can deliver to encampments, motels, shelters or places where people are living rough.
4. I volunteer every other Friday evening and make deliveries from approximately 7:00 p.m. to 9:00 p.m. I use my vehicle to make these deliveries and I work with a partner.
5. Since in and around June of 2022, I have been driving onto the site at the encampment at 100 Victoria Street North, Kitchener. I often have 4 large Costco sized delivery bags full of food. We also often have cases of water and juice to deliver. We also regularly deliver household essentials, including clothing, blankets, sleeping bags, sleeping mats, tarps, medication, pet food, feminine hygiene products and anything that has been donated to our organization.
6. The food and donation items are heavy and cumbersome to carry. On average one of the bags we carry in is 40-60 lbs. We have a good system where if residents of the encampment needed anything, they would come to the trunk of my vehicle to look at the household goods and take what they need.

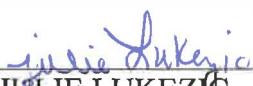
7. On Friday, April 25, 2025, I attempted to pull into the encampment as I always do, but there was a security vehicle blocking the entranceway. There were two security guards sitting in the vehicle and they were on their phones, they did not make eye contact with me.
8. I pulled into the parking lot immediately to the West of the encampment. I had previously been instructed by security guards that I was not allowed to park in that lot, but I wasn't sure what to do and I needed to make our delivery. I didn't want to have to carry everything from far away and we had other deliveries to make around town.
9. I noticed that the security vehicle was idling on site the entire time that I was dropping off donations at the encampment.
10. I do not understand the purpose of the security vehicle being parked where it is. The security was not stopping me or others from walking onto the site. It is only making it more difficult for agencies like Going Mobile KW and other community volunteers to make deliveries to the encampment by vehicle.
11. Since April 16, 2025, when the Region dropped off multiple dumpsters on the site Encampment residents have expressed to me that they do not want to leave their tent. They have expressed worry and concern with losing their personal items and things being thrown away or removed while they are away from their tent.
12. I am concerned about getting parking tickets and fines for making these deliveries to the encampment. However, I am committed to continuing this important volunteer work with Going Mobile KW and will continue to drop off these donations every other Friday evening.

13. I make 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 8<sup>th</sup> day of )  
May, 2025 )  
In the Regional Municipality of Waterloo )

 \_\_\_\_\_

Ashley Schuitma  
LSO # 68257G

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JULIE LUKEZIC

THE REGIONAL MUNICIPALITY OF  
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**ONTARIO  
SUPERIOR COURT OF JUSTICE**

Proceeding commenced at KITCHENER

**AFFIDAVIT OF JULIE LUKEZIC**

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Lawyers for the Respondents

# **TAB 30**

**ONTARIO  
SUPERIOR COURT OF JUSTICE**

B E T W E E N:

THE REGIONAL MUNICIPALITY OF WATERLOO

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**AFFIDAVIT OF LAURA PIN**

I, Laura Pin, of the City of Hamilton, in the Province of Ontario, AFFIRM AND SAY:

1. The facts and opinions contained in this affidavit are based on my own research and experiences as well as information not based on my personal knowledge, which I believe to be credible and true.
2. I am an Associate Professor and researcher at Wilfrid Laurier University. I currently lead a multi-year federally funded research project reviewing municipal policy responses to encampments through a human rights lens. Please find attached as **Exhibit “A”** to this affidavit a copy of my current curriculum vitae.
3. I am a member of the Co-creators table of the Plan to End Chronic Homelessness (“PECH”) and have been a member of the table since it was first established. The Plan to End Chronic

Homelessness was approved by the Region of Waterloo (“Region”) on April 24, 2024. The Co-creators table is a group comprised of over 60 community organizations and individuals representing virtually all facets of the homelessness response locally. The role of the Co-Creators table is to coordinate local policy and program action to address chronic homelessness among diverse stakeholders active in the Region, including service providers, lived experts, community advocates, academics and other relevant organizations. The Co-Creators meet once a month for three hours at a time. I cannot always attend the Co-Creators meetings, I estimate that I have attended a third of them to date, however I keep updated by reading the emails and website. Please find here for information the website for the Co-Creators:

<https://sites.google.com/overlapassociates.com/pechcocreator>

4. I also sat on a PECH sub-committee chaired by David Alton, who is with Social Development Centre Waterloo Region, from August 2023 to April 2024. The sub-committee focussed on a Human Rights Review of Municipal Policies and Bylaws. The sub-committee met monthly, sometimes more frequently, and were attended by Peter Philips from the Region of Waterloo, who was then the Manager of PECH. The subcommittee prepared a report that was integrated into the Lived Expertise Prototyping report and Plan to End Chronic Homelessness, both of which were subsequently adopted by Regional Council. As part of this work, we met with Commissioner of Social Services Mr. Peter Sweeney in December of 2023 to share findings and discuss the need for a human rights centred approach in housing services and also other regional departments.

5. I believed that by adopting the PECH, the Region committed to a human rights approach. This is mentioned throughout PECH, specifically at page 43 which states “Human Rights needs to be a building block of our community approach to housing (Lived Expertise Prototyping Cohort, 2024) – alongside Housing First – and should drive our empathy, action and advocacy.”
6. On March 20, 2025, I attended the Co-creators meeting. As a part of that meeting the PECH All of Community Leadership Model prototype was provided. The Prototype explained the Model would 1. transform the role of the regional government in relation to homelessness by setting and continually evaluating a shared community vision by upholding human rights in our values, goals and actions; 2. hold the system accountable by formalizing a transparent, explorative and flexible decision-making as well as outcome evaluation; and 3. build an inclusive system and community culture by anchoring work in collective ethics informed by the human rights approach. Please find attached as **Exhibit “B”** a copy of this prototype from the March 20, 2025 PECH Co-Creator Roundtable presentation.
7. Due to my ongoing involvement with regional policy work and expertise in studying of chronic homelessness, the Region approached myself and my colleague Dr. Erin Dej to be hired on contract to engage in policy work for the Region on PECH. In April 2025, the contract for this work had not yet been formally signed but all of the parties were in agreement to move forward. It was planned to announce this contract and our work at the Co-creators meeting on Tuesday, April 15, 2025.

8. On Monday, April 14, 2025, I received an email sent to myself and Dr. Dej from the Manager of the PECH, Ms. Jen Gordon titled “Can we chat ASAP”. Please find attached as **Exhibit C** a copy of this email. We arranged to meet over Microsoft Teams that afternoon. In the meeting was myself, Dr. Dej, Ms. Jen Gordon, Mr. Ryan Pettipiere, the Director of Housing Services for the Region, and Mr. Chris McEvoy, Manager, Housing Policy & Homelessness Prevention for the Region.
9. During the meeting Mr. Pettipiere explained there was an announcement happening on Wednesday, April 16, 2025 from the Region and he expected that Dr. Dej and I would be upset with the content of the announcement to the extent that we may find ourselves unable to continue working with the Region. He indicated the Region still wanted Dr. Dej and I to agree to the contract but because of the announcement it may change my and Dr. Dej’s decision about working with the Region. Mr. Pettipiere did not provide any more information about the nature of the announcement. Ms. Gordon recommended we delay announcing to the Co-creators table the policy work until after the Region’s announcement. We agreed to this arrangement.
10. On April 15, 2025, Erin Dej and I attended the Co-creator meeting. No mention was made by Region staff of any upcoming announcement.
11. On April 16, 2025, I learned that as of 1:00 pm police officers and bobcats arrived at the 100 Victoria Street Encampment (the “Encampment”). I was concerned about the impact that policy officers and bobcats would have on people staying at the Encampment, as sudden

deployment of heavy equipment without pre-warning or communication is retraumatizing for people experiencing homelessness who have experienced forced displacement in the past. I sent out an email to the full Co-creators email list of over 125 plus members to ask for some transparency and accountability with respect to their presence, as I had heard from community members present at the Encampment at 1:00 pm that people staying there were concerned that the equipment could indicate plans for forced removal. Please find attached as **Exhibit “D”** a copy of this email. I did not receive a response to the email from anyone at the Region to my email. I did receive reply-all responses from two other members of the Co-Creators table expressing concern and asking for clarity. To my knowledge, the Region did not respond directly to any of these emails.

12. On April 16<sup>th</sup>, 2025 at 2:46 pm, I received an email message from Commissioner Sweeney, indicating that the Region was going to be considering a new by-law concerning the Encampment, and that the report and draft text of the by-law would be available on the Region’s website at 4:00 pm, as part of the agenda package for the Regional Council Meeting planned for April 23, 2025. Please find attached as **Exhibit “E”** a copy of this email. Shortly after 4:00 pm, I reviewed the draft report and Site Specific By-Law (“By-Law”). I was surprised that there had been no previous consultation with the PECH Co-Creators concerning the By-Law as it related to individuals experiencing chronic homelessness in the Region and as such fell within my understanding of the mandate of PECH. I also was concerned that there had been no consultation concerning the By-Law with individuals residing at the Encampment, or with service providers working with people at the Encampment or with those experiencing chronic homelessness across the Region more broadly, as my understanding of the PECH was

that it created a set of expectations that collaborative discussion with the housing and homelessness ecosystem would be part of any policy and program decisions concerning chronic homelessness.

13. Beyond the exclusion of PECH, I was particularly concerned about a number of provisions in the By-Law that seemed to make it functionally impossible (or at least very difficult) to maintain a tent/shelter structure at the Encampment, including restrictions on movement for residents, restrictions on site access for service providers, provisions for kettling residents into progressively smaller pieces of the property, vague and unclear prohibitions on harmful or threatening materials, and highly punitive fines for contravening any part of the By-Law. I also was concerned about the section of the staff report that described the By-Law as retroactively applying from date of notice once Regional Council approved the By-Law, as this seemed to imply that residents (who had not yet been informed of the By-Law) should be pre-emptively complying with guidelines that were not yet approved, or even publicly discussed.

14. I attended the online debrief meeting on April 17, 2025 facilitated by the Region and asked several questions. Commissioner Sweeney attempted to answer my questions, however, I found the responses either unclear, or clear but inconsistent with what was in the staff report that accompanied the By-Law, which he had approved. For example, the Commissioner emphasized that the By-Law was not yet in effect, however, the staff report clearly states that the By-Law applies retroactively to day of announcement.

15. On April 23, 2025, I attended the Regional Council meeting as a delegate on the By-Law I explained that I find the process by which the By-Law was developed deeply concerning. I

expressed my worry that the approach at the Encampment would be ineffective and undermine trust with community partners. I emphatically expressed that I could not fathom how the By-Law was developed without consulting the PECH Co-creators. This wasted the tremendous amount of work invested in building up collaborative policy infrastructure and the time and energy spent by service providers and lived experts.

16. In my delegation I pointed out that the By-Law was developed in secret, without input from community members and organizations. No one at the Encampment were informed of the By-Law and it was announced to the residents by the presence of police, bobcats and dumpsters. This announcement was not trauma informed or conducive to building pathways towards housing. I explained that on April 22, 2025, I spent time at the Encampment speaking with residents and no one from the Region had spoken to them about the By-Law. This was not meaningful engagement, not consistent with PECH or a human rights approach, or even good policy making.

17. My second point I made in my delegation was that there are not enough supportive housing spaces or subsidies available to house people experiencing homelessness by December 1, 2025. Given the Region's own recent point in time count which showed 2,300 residents of the Region experiencing homelessness, the situation has worsened since the decision issued by The Honourable Justice Valente in *The Regional Municipality of Waterloo v. Persons Unknown and to be Ascertained, 2023 ONSC 670*. The proposal by the Region to offer motel rooms was made without any direct consultation with residents or service providers. This option is not

viable because of the significant barriers to these spaces and that they are temporary, not permanent, housing solutions.

18. Lastly, the By-Law criminalizes the survival activities of the residents of the Encampment and those who provide assistance to them. The By-Law prohibits anyone who was not a resident as of April 16, 2025 from residing there and proposes fines up to \$5,000.00 for individuals who move their structures without permission to another part of the lot, for example, to avoid flooding or hazards. The By-Law outlines a process for progressively “kettling” or fencing in the site while residents are still living there. This is not consistent with a human rights approach. I asked for Regional Council to direct staff to work with the PECH Co-creators table to create a realistic plan to work within the seven month timeframe which would be consistent with the principles of PECH to avoid harming and further marginalizing people experiencing homelessness in our community.

19. Despite my delegation and those from many other community members, Regional Council passed the By-Law.

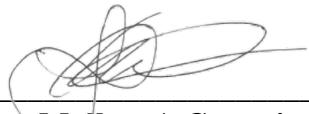
20. Since the passing of the By-Law I have worked to develop a survey to facilitate interviews of residents of the Encampment as well as other people in Waterloo Region and Hamilton experiencing homelessness. The Realizing the Right Encampment Survey provides a snapshot of the experiences of people staying in encampments in the Region. We surveyed 41 individuals who had stayed in encampments in Waterloo Region in the past 12 months. We found that most people have stayed in encampments for more than six months, with some

individuals indicating they have lived in encampments for several years. We further found that 66% of respondents described having a disability. We found that people staying in encampments in Waterloo Region experience multiple, complex, and overlapping barriers to emergency shelter access, relating both to the availability and accessibility of emergency shelter spaces. There are significant barriers to accessing permanent housing for people staying in encampments, including insufficient income to access private market housing, long waitlists for social housing, difficulty connecting with housing workers, and complex administrative rules governing social housing processes. Please find attached hereto as **Exhibit “F”** a Snapshot of our Realizing the Right Waterloo findings.

21. Since the passing of the By-Law I understand there has been an increased security presence noticeable decrease by Mutual Aid supporters in food, clothing and supply donations. I attach an op-ed written by my colleague Dr. Dej hereto as **Exhibit “G”** titled “Don’t block the help: Restoring access and dignity to Kitchener encampment residents” which was published in the Waterloo Record on June 10, 2025.

22. I make this Affidavit in support of the Respondent’s Application and for no improper purpose.

SWORN remotely by Laura Pin at the City of Hamilton, in the Province of Ontario, before me at the County of Wellington in the Province of Ontario on July 9, 2025 in accordance with O. Reg. 431/20.



**Joanna Mullen, A Commissioner  
of Oaths (LSO#: 64535V)**



**Laura Pin**

THIS IS **EXHIBIT “A”** REFERRED TO  
IN THE AFFIDAVIT OF LAURA PIN  
SWORN REMOTELY AT THE CITY  
OF HAMILTON BEFORE ME AT THE  
COUNTY OF WELLINGTON DURING  
A VIDEOCONFERENCE IN  
ACCORDANCE WITH O.REG. 431/20,  
ADMINISTERING OATH OR  
DECLARATION REMOTELY THIS 9<sup>th</sup>  
DAY OF JULY, 2025



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JOANNA MULLEN  
A Commissioner, etc.,  
Province of Ontario,  
While a Barrister and Solicitor.  
LSO#: 64535V

**LAURA PIN, PhD**  
Department of Political Science  
Wilfrid Laurier University  
lpin@wlu.ca

## CURRICULUM VITAE

### **RESEARCH EXPERTISE**

---

Canadian politics, housing policy, social policy, deliberative democracy, participatory democracy, municipal and local government, community engaged scholarship

### **DEGREES**

---

2019            **Ph.D. Political Science**  
York University, Toronto, ON.  
Dissertation: *Participatory Governance, Neoliberal Restructuring and Participatory Budgeting in Chicago, IL*  
Supervisor: Dr. Dennis Pilon

2010            **M.A. Globalization Studies**  
McMaster University, Hamilton, ON.  
Supervisor: Dr. Suzanne Mills

2009            **H. Bach. Arts & Science**  
McMaster University, Hamilton, ON.

### **ACADEMIC POSITIONS**

---

2025-present    **Associate Professor**  
Department of Political Science  
Wilfrid Laurier University, Waterloo ON.

2021-present    **Assistant Professor**  
Department of Political Science  
Wilfrid Laurier University, Waterloo ON.

2023-2024       **Acting Director**  
Laurier Institute for the Study of Public Opinion and Policy (LISPOP)  
Wilfrid Laurier University, Waterloo ON.

2019-21           **Postdoctoral Scholar**  
Department of Political Science & Community Engaged Scholarship Institute  
University of Guelph, Guelph, ON.

2020            **Interim Project Manager**  
SSHRC Partnership Grant  
University of Guelph, Guelph, ON.

2016            **Visiting Scholar, Great Cities Institute**

University of Illinois, Chicago, IL.  
Supervisor: Dr. Rachel Weber

## AWARDS

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2024	Laurier Equity, Diversity, and Inclusion Fund (\$890)
2024	Laurier Teaching Release, Research Category
2023	Laurier Merit Award, Research Category (\$1,200)
2023	Laurier Teaching Release, Research Category
2021-2023	SSHRC Postdoctoral Scholarship, CMHC stream (declined) (\$90,000)
2019-20	Community Engaged Scholarship Institute (CESI) Research Grant (\$5,000)
2016	SSHRC Michael Smith Foreign Study Supplement (\$4,500)
2013-16	SSHRC Joseph-Armand Bombardier Canada Graduate Scholarship (\$105,000)
2012	York Graduate Scholarship (\$3,000)
2009-10	Ontario Graduate Scholarship (\$15,000)

## EXTERNAL RESEARCH GRANTS

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2025-28	SSHRC Partnership Development Grant (applicant) \$191,770 <i>Staying Home 2.0: Rent Banks, Housing Stability and Eviction Prevention Across Canada</i> *Ranked 5th out of 107 applications in the adjudication committee
2024-27	SSHRC Insight Grant (co-applicant, with Dr. Pascal Lupien) \$94,776 <i>Political Participation and Migrants: A Comparative Study of Mechanisms and Strategies For Making Migrants' Voices Heard</i>
2024	MITACS Accelerate Grant (applicant, with Dr. Anthony Piscitelli) \$15,000 <i>Housing Affordability Financing Study</i>
2023-25	SSHRC Insight Development Grant (applicant) \$63,737 <i>Realizing the Right to Housing: Municipal Policy Responses to Encampments in Canada</i>
2023-25	CIHR Planning and Knowledge Dissemination Grant \$50,000 (co-applicant, with Dr. Lara Nixon). <i>Co-designing Equity Care with Older People with Experiences of Homelessness (OPEH): Exchanging Knowledge, and Planning Future Systems Improvement</i>
2022-23	SSHRC Partnership Engage Grant (applicant) \$24,550 <i>Filling the Gap: The Role of Social Engagement Hubs in a World Changed by COVID-19</i>
2022	Canadian Mortgage and Housing Corporation (co-applicant, with Dr. Leah Levac) \$32,000 <i>A National Housing Strategy By and For Whom? Documented Experiences of People with Living Knowledge of Housing Need</i>
2021-23	SSHRC Partnership Engage Grant (applicant, with Dr. Tobin Haley) \$24,633 <i>Staying Home: An Exploratory Study of Rent Banks in Canada</i>

2021-23 District of Kitimat, British Columbia (co-applicant with Dr. Leah Levac) \$75,000  
*Diversity and Inclusion Planning in a Small Northern Municipality*

2020-22 SSHRC Connection Grant (applicant) \$30,200  
*Transforming policy through digital storytelling: A workshop and symposium on homelessness on the rural-urban fringe (RUF)*

2020 Employment and Social Development Canada (collaborator, with Dr. Deborah Stienstra) \$94,995  
*Disability Inclusion Analysis of Lessons Learned and Best Practices of the Government of Canada's Response to the COVID-19 Pandemic*

2019-20 SSHRC Knowledge Synthesis Grant (collaborator, with Dr. Deborah Stienstra) \$29,000  
*Addressing the + in GBA plus: Exploring promising international practices in impact assessments*

## **INTERNAL RESEARCH GRANTS**

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2024 University of New Brunswick Harrison McCain Young Scholar Award (co-applicant with Dr. Tobin Haley) \$15,000. *Rent Banks in Canada*.

2023 Wilfrid Laurier University Internal Category A Grant (applicant) \$12,900  
*Municipal Encampments through a Human Rights Lens: A Case Study of A Better Tent City (ABTC) in Kitchener, ON*

2020 University of Guelph COVID-19 Catalyst Grant (applicant) \$19,950  
*Mobilizing Marginalized Knowledges and Practices for Structural Transformation*

## **EXPERT CONSULTING**

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2024-2025 Client: Norton Rose Fulbright Canada  
Court Case: Clinique Juridique Itinérante v. Ville de Saint- Jérôme, No: 700-17-020156-245

2023-24 Client: Social Development Centre Waterloo Region and Region of Waterloo  
Project: Plan to End Chronic Homelessness

2023 Client: City of Kitchener  
Project: Places and Spaces Parks Plan

2022 Client: Waterloo Region Community Legal Services  
Court Case: The Regional Municipality of Waterloo v. Persons Unknown and to be Ascertained, 2023 ONSC 670

2021-22 Client: Services and Housing in the Province (SHIP)  
Project: Program Evaluation, Short Stay Crisis Support Program Peel Region

2017-19 Client: Services and Housing in the Province (SHIP)

Project: Program Evaluation, Ontario Trillium Foundation Local Poverty Reduction Initiative, Community Flex Fund

2017-18 Client: Samara Centre for Democracy  
Project: Member of Provincial Parliament Survey

## **PUBLICATIONS<sup>1</sup>**

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### **Peer Reviewed Journal Articles**

2025 Levac, L., **Pin, L.**, Buchnea, A., Malenfant, J., & Annan, J. (2025). A national housing strategy for whom? Possibilities and limits in Canada's National Housing Strategy (NHS) for a rights-based housing regime. *International Journal of Housing Policy*, 1-30.

2024 **Pin, L.**, Haley, T., and Levac, L. Using Community-Engaged Arts-Based Methods to Explore Housing Insecurity in Rural-Urban Spaces. *Engaged Scholarship Journal: Community-Engaged Research, Teaching, and Learning*. Forthcoming Jul 2024.

2024 Malenfant, J., Annan, J., **Pin, L.**, Levac, L., and +Buchnea, A. Toward the Right to Housing in Canada: Lived Experience, Research, and Promising Practices for Deep Engagement. *Engaged Scholarship Journal: Community-Engaged Research, Teaching, and Learning*. Forthcoming Jul 2024.

2024 Haley, T., Woodhall-Melnik, J., and **Pin, L.** New Roles Amidst Crisis: Comparing Municipal Affordable Housing Strategies in New Brunswick. *International Journal on Homelessness* Forthcoming Jul 2024.

2022 **Pin, L.**, and Haley T. On the Edge of the Bubble. Transformative Housing Policy on the Rural-Urban Fringe. *Journal of Rural and Community Development*. 1-24.

2022 **Pin, L.**, Levac, L., and +Rodenburg, R. Legislated Poverty? An Intersectional Policy Analysis of Covid-19 Income Support Programs in Ontario, Canada. *Journal of Poverty*, 1-28. <https://doi.org/10.1080/10875549.2022.2113590>

2022 Levac, L., Cattapan, A., Haley, T., **Pin, L.**, Tungohan, E., and Wiebe, S.M. Better Together: Disrupting Power and Transforming Public Policy with Engaged Scholarship. *Policy and Politics*, 1-24.

2021 **Pin, L.** From Aldermanic Patronage to Aldermanic Menus: Racial Exclusion and the Reinvention of Participatory Democracy in Neoliberal Chicago. *Studies in Political Economy*. 102(2): 1-21

2021 **Pin, L.** Bridging the Gap between Electoral and Participatory Democracy: The Electoral Motivations behind Participatory Budgeting. *Urban Affairs Review*. <https://doi.org/10.1177/1078087420964871>

2020 **Pin, L.** Intersections of Race, Class and Citizenship in Participatory Democracy: Interrogating the Racial Dynamics of Participatory Budgeting. *New Political Science: Special Issue on Race and Citizenship*. <https://doi.org/10.1080/07393148.2020.1840199>

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<sup>1</sup> \* Authors contributed equally; authors listed in alphabetical order.

^ Denotes community collaborator

+ Denotes a student collaborator

2018 \*Bernhardt, N. and **Pin, L.** Engaging with 'identity politics' in the Canadian social sciences. *Canadian Journal of Political Science*. 51(4): 771-794.

2017 **Pin, L.** Does Participatory Budgeting Lead to Local Empowerment? The Case of Chicago, IL *Alternate Routes*. 28: 114-141.

2017 \*Gray, M. and **Pin, L.** (2017). University Branding, Securitization and Campus Sexual Assault at a Canadian University. *The Annual Review of Interdisciplinary Justice Research*. 6: 86-110.

2016 **Pin, L.** Global Austerity and Local Democracy: The Case of Participatory Budgeting in Guelph, ON. *Canadian Political Science Review*. 10(1): 72-108.

2010 Evans, B.J., **Pin, L.**, Melnick, D.J., Wright, S.I. (2010). Sex linked inheritance in macaque monkeys: implications for effective population size and dispersal. *Genetics* 185: 923-937.

### Peer Reviewed Journal Articles Under Review

2025 **Pin, L.**, +Barnett, R.G., +Ermeta, N., and +Suthakaran, A. 'More than Shelter: A Case Study of Wellbeing in a Sanctioned Managed Encampment in Ontario, Canada. *International Journal on Homelessness*. (under review)

2024 **Pin, L.**, +Barnett, R.G., +Ermeta, N., and +Suthakaran, A. 'Community Beyond Expectations': The Role of Autonomy and Care in Managed Encampments. *Urban Geography*. (revision submitted May 2025).

### Peer Reviewed Book Chapters

2022 +Grand Maison, V., +Reinders, K, **Pin, L.**, ^Abbas, J, and Stienstra, D. Cumulative and Cascading Impacts of Invisibility: An Intersectional Approach to Understanding the Housing Experiences of Canadians with Disabilities During COVID-19. *Research in Social Sciences and Disability*. 1-19.

2022 Haley, T.L. and **Pin, L.** Injustice in Incentives: Doing Research with People Living with Poverty. In Casey Burkholder (Ed.) *Leading and Listening to Community: Facilitating Qualitative, Arts-Based & Visual Research for Social Change*.

2019 Gray, M., **Pin, L.**, Cooper, A. (2019). Curated Consultation in Sexual Assault Policy-Making Processes. In K.A. Malinen (ed.), *Dis/Consent: Perspectives on Sexual Violence and Consensuality*. Fernwood Publishing.

### Papers for Refereed Conferences

2025 Haley, T. and **Pin, L.** "Sustaining an Unsustainable System: Policy Failure and Rent Banks in Canada". Canadian Political Science Association Annual Conference, George Brown College, Toronto, ON.

2024 **Pin, L.**, Barnett, R.G., Ermeta, N., and Suthakaran, A. 'Community Beyond Expectations': The Role of Autonomy and Care in Managed Encampments Canadian Political Science Association Annual Conference, McGill University, Montreal, QC.

2023 Levac, L., and **Pin, L.** A national housing strategy for whom? Possibilities and limits in Canada's National Housing Strategy (NHS) for a rights-based housing regime. Canadian Political Science Association Annual Conference, York University, Toronto, ON.

2022 Levac, L. and **Pin, L.** Pursuing Participatory Policy-Making to Address Systemic Oppression in Small, Northern Municipalities. Canadian Political Science Association Annual Conference, Virtual Conference

2022 +Brown, A., Gillies, S., +Marshall, V., +Mcgurk, Hannah, and **Pin, L.** (2022, June). How do municipalities in respond to encampments? Evaluating municipal responses in Ontario and Manitoba using a human rights framework. Canadian Political Science Association Annual Conference, Virtual Conference

2021 \*Haley, T. and **Pin, L.** On the Edge of the Bubble. Transformative Housing Policy on the Rural-Urban Fringe. Canadian Political Science Association Annual Conference, Virtual Conference.

2021 **Pin, L.** and Levac, L. Legislated Poverty? An Intersectional Policy Analysis of Covid-19 Income Support Programs in Canada. Canadian Political Science Association Annual Conference, Virtual Conference.

2021 \*Bernhardt, N., and **Pin, L.** Troubling the Lack of Settler-Colonial Truths in Introductory Approaches to Teaching Canadian Political Science. Canadian Political Science Association Annual Conference, Virtual Conference.

2020 **Pin, L.**.. Participatory Neoliberalism? The Reinvention of Participatory Democracy in the Neoliberal Era. Workshop: Exploring a Critical Institutionalism, York University, Toronto.

2020 **Pin, L.**, Haley, TL. Homelessness on the Rural-Urban Fringe: The Case of Dufferin County. Urban Policy and Marginalized Groups. Canadian Political Science Association Annual Conference (Congress), University of Western Ontario, London, ON. *Conference cancelled due to Covid-19.*

2019 **Pin, L.** Exploring the Social Struggles over Redevelopment in a Chicago Neighbourhood. Paper presented at the Society for the Study of Social Problems (SSSP) Annual Conference. Roosevelt Hotel, New York, NY.

2019 \***Pin, L.**, Bernhardt, N. 'Sorry, Not Sorry': Troubling our Positionality as non-Indigenous Educators Teaching on the Canadian State. Workshop: Teaching and Learning after the TRC. University of British Columbia, Vancouver, BC.

2019 **Pin, L.** Bridging the Gap between Electoral and Participatory Democracy: The Electoral Motivations behind Participatory Budgeting. Paper being presented at the Canadian Political Science Association (CPSA) Annual Conference, University of British Columbia, Vancouver, BC.

2019 **Pin, L.** Intersections of Race, Class and Citizenship in Participatory Democracy: Interrogating the Racial Dynamics of Participatory Budgeting. Paper being presented at the Canadian Political Science Association (CPSA) Annual Conference, University of British Columbia, Vancouver, BC.

2018 **Pin, L.** Bottom-Up or Top-Down? Participatory Budgeting and Community Empowerment. Paper presented at the Participate!, University of Illinois, Chicago, ON.

2018 **Pin, L.** (2018, Apr.). "How Would You Spend a Million Dollars?" A Tale of Neighborhood Redevelopment and Participatory Budgeting. Paper presented at

the Urban Affairs Association Annual Conference, Sheridan Hotel Center, Toronto, ON.

2017 **Pin, L.** What Can Critical Theory Teach Us About Participatory Budgeting? Paper presented at the American Political Science Association (APSA) Annual Conference. San Francisco, CA.

2017 **Pin, L.** "How Would You Spend a Million Dollars?" A Tale of Gentrification and Pro-Poor Budgeting. Paper presented at the Society for the Study of Social Problems (SSSP) Annual Conference. Hotel Bonaventure, Montreal, QB.

2017 Bernhardt, N. and **Pin, L.** 'Real' Politics and 'Identity' Politics: resisting the reprivatizing of particular 'identities' in political discourse. Paper presented at the Canadian Political Science Association (CPSA) Annual Conference. Ryerson University, Toronto, ON.

2016 **Pin, L.** Governing Democracy: Participatory budgeting, deliberative democracy and urban governance. Paper presented at the Canadian Political Science Association (CPSA) Annual Conference. University of Calgary, Calgary, AB.

2016 \*Bernhardt, N. and **Pin, L.** What's in a name? Disciplinary Engagement with 'Identity Politics' in Canadian Social Sciences. Presentation at the Women's and Gender Studies et Recherches Féministes (WGSRF) Annual Conference. University of Calgary, Calgary AB.

2016 \*Bernhardt, N. and **Pin, L.** 'Identity Politics' Backlash: Interrogating Disciplinary Engagement with Marginalized 'Identities' within Canadian Social Sciences. Paper presented at the Interdisciplinary Center for Gender Studies International Congress. Institute of Social and Political Sciences Universidade de Lisboa, Lisbon, Portugal.

2015 **Pin, L.** Global Austerity and Local Democracy: Participatory Budgeting in Hamilton, ON. and Guelph, ON. Paper presented at the Contesting Canada's Future Conference. Trent University. Peterborough, ON.

2014 **Pin, L.** Does Deliberative Democracy Work? An Investigation of Participatory Budgeting in Guelph, ON. and Hamilton, ON. Paper presented at the Canadian Political Science Association (CPSA) Annual Conference. Brock University, St. Catharines, ON.

2014 **Pin, L.** Reconstructing the nation through mega events: The Vancouver 2010 Olympic Games and Indigenous Peoples. Paper presented at the International Studies Association Conference. Sheraton Hotel, Toronto, ON.

### Research Reports, Government

2023 Levac, L., **Pin, L.**, ^Ramadatt, J., ^Christiansen, R., and +Zhang, X. (2023). Diversity and Inclusion Planning: A Report for the District of Kitimat, BC. Report prepared for the District of Kitimat.

2022 Levac, L., +Buchnea, A., **Pin, L.**, +Karyar, R., Annan, J., Morton, E. and Malenfant, J. (2022). A National Housing Strategy By and For Whom? Report prepared for the National Housing Council. <https://assets.cmhc-schl.gc.ca/sites/place-to-call-home/pdfs/national-housing-council/nhs-a-national-housing-strategy-by-and-for-whom-en.pdf?rev=9090b766-002c-4e4a-a757-0502aeca9f9b>

2020 Stienstra, D., +Grand'Maison, V., **Pin, L.**, +Rodenburg, E., Garwood, K., and +Reinders, K. (2020). Disability Inclusion Analysis of Lessons Learned and Best

Practices of the Government of Canada's Response to the COVID-19 Pandemic. Report prepared for Employment and Social Development Canada.

2018 \*Morden, M., Mussell, J., **Pin, L.**, and Preston, S. National Action for Civic Literacy. (2018). Report prepared by Samara for the Privy Council Office of the Government of Canada.

**Research Reports, Community Organizations**

2025 **Pin, L.**, Brusse, R., and Dej, E. Realizing the Right: Municipal Policy Responses to Encampments Waterloo Region Snapshot. Social Development Centre Waterloo Region.

2024 Piscitelli, A., Ornelas, V., Hayes, N., Guevara, M., Lovell, M., and **Pin, L.** Credit Unions and Housing Affordability: Canadian Trends and Opportunities. Conestoga Social Innovation Lab. <https://research.conestogac.on.ca/research-publications/publications/credit-unions-and-housing-affordability-canadian-trends-and-opportunities>

2024 Haley, T. and **Pin, L.** Staying Home: The Role of Rent Banks in Enhancing Housing Stability for Canada's Renter Households. Canadian Rentbank Coalition. ISBN 978-1-0688751-0-6.  
[https://www.rentbanks.ca/\\_files/ugd/643ed5\\_a842ae706c4b4d94924a9383c56ba2a8.pdf](https://www.rentbanks.ca/_files/ugd/643ed5_a842ae706c4b4d94924a9383c56ba2a8.pdf)

2024 **Pin, L.**, +Barnett, N.R.G., +Ermeta, N., and +Suthakaran, S. "A Place to Find Community" Findings from the A Better Tent City Survey. Report hosted by Social Development Centre Waterloo Region. <https://civichubwr.org/a-better-tent-city/>

2023 **Pin, L.**, Forma, L., and ^Petrovic, A. Civic Engagement and Grassroots Organizing through the COVID-19 Pandemic: A Case Study of Civic Hub Waterloo Region. Report hosted by Social Development Centre Waterloo Region. <https://www.waterlooregion.org/sites/default/files/CivicHubReport-2023.pdf>

2022 +Brown, A., +Gillies, S., +Marshall, V., +Mcgurk, Hannah, and **Pin, L.** Homeless Encampments Through a Human Rights Lens. Report hosted by Canadian Observatory on Homelessness.  
<https://www.homelesshub.ca/resource/homeless-encampments-through-human-rights-lens>

2022 Haley, T., **Pin, L.** Marshall, V., and +Berthelot, P. Barriers Beyond the City: Housing and Economic Poverty in Dufferin County. Dufferin Lived Experience Collective. [www.dufferinchange.ca](http://www.dufferinchange.ca)

2022 **Pin, L.**, Haley, T., + Berthelot, P., and +Marshall, V. Food Insecurity in Farm Country. Dufferin Lived Experience Collective. Report. [www.dufferinchange.ca](http://www.dufferinchange.ca)

2022 **Pin, L.** and Haley, T. Short Stay Crisis Housing Nursing Support. Program Evaluation for the Short Stay Crisis Support Program (SSCSP) in Peel Region. Report prepared for Services and Housing in the Province (SHIP).

2021 **Pin, L.**, Levac, L., +Rodenburg, E., and +Hatt, K. Dangerous Disruptions to Money, Essentials for Daily Living and Housing. The COVID-Related Experiences of People Living with Poverty in Rural and Small Urban Communities in Southern Ontario. University of Guelph Live-Work-Well Research Centre.  
<https://liveworkwell.ca/dangerous-disruptions-local-intersections-poverty-and-covid-19-guelph-wellington-and-dufferin-o>

2021 **Pin, L.**, Levac, L., +Rodenburg, E., and +Hatt, K. The Need for Permanent Supportive Housing: An Intersectional Analysis of COVID-Related Housing Policies. University of Guelph Live-Work-Well Research Centre <https://liveworkwell.ca/sites/default/files/pageuploads/NeedforSupportiveHousing.pdf>

2021 **Pin, L.**, Levac, L., +Rodenburg, E., and +Hatt, K. Unequal Income Support and the Case for a Universal Basic Income: An Intersectional Analysis of COVID-Related Income Policies. University of Guelph Live-Work-Well Research Centre <https://liveworkwell.ca/sites/default/files/pageuploads/CaseforUniversalBasicIncome.pdf>

2019 Haley, T.L., **Pin, L.**, Mussell, J., & Froese, R. Final Report for Poverty Reduction Grants: A Picture of Poverty in Dufferin County. Report prepared for the Ontario Trillium Foundation.

2016 Chan, M., Gapski, G., Hurley, K., Ibarra, E., **Pin, L.**, Shupac, A. and Szabo, E. (2016). *Bike Lanes, On-Street Parking and Business in Parkdale: A Study of Queen Street West in Toronto's Parkdale Neighbourhood*. Toronto Coalition for Active Transportation. Toronto, Ontario.

2016 \* Gray, M. and **Pin, L.** *Invisible supports: Examining undergraduate student knowledge of sexual assault resources at York University*. SIV. Toronto: Ontario.

2012 **Pin, L.** and Martin, C. Student Health: Bringing Healthy Change to Ontario's Universities. Research Report. Toronto: Ontario Undergraduate Student Alliance.

2011 **Pin, L.**, Martin, C. and Andrey, S. *Rising Costs: A Look at Post-Secondary Expenditures*. Research Report. Toronto: Ontario Undergraduate Student Alliance.

2010 CSA, OSTA and OUSA. *Breaking Barriers: A Strategy for Equal Access to Higher Education*. Research Report. Toronto: Ontario Undergraduate Student Alliance.

## INVITED PRESENTATIONS

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2024 MacLatchy, D. (moderator), **Pin, L.**, Gillies, S., Prentiss, J. Women Finding Housing Solutions for a Better Future. Wilfrid Laurier University and the International Women's Forum's International Women's Day luncheon, Ken Seiling Museum Waterloo Region, Kitchener, ON.

2023 Lindo, L.M. (moderator), **Pin, L.**, Siembida, S., Lafreniere, G., Knight, M. Criminalization of Poverty. Poverty Reduction Fall Forum. Hosted by Waterloo Region Community Legal Services. Kitchener Public Library, Kitchener, ON.

2023 Deutschmann, R. (moderator), Down, S., Doucet, B., Jagorin, M., Knight, M., **Pin, L.**, and Ruttan, M. Renoviction – Righting the Reno Wrong. Waterloo Region Community Town Hall. Panel Discussion. <https://www.wrcommunitytownhalls.ca/renoviction---righting-the-reno-wrong---main-event-page.html>

2023 **Pin, L.** and +Mcgurk, H. Homeless Encampments Through a Human Rights Lens. Laurier-Milton Speaker Series, First Ontario Centre, Milton, ON.

2023 **Pin, L.** Canada's Housing Regime: Municipal Policy Responses to Encampments. Political Science Department Speaker Series at the University of Waterloo. Waterloo, ON.

2023 **Pin, L.** Participatory Budgeting and the Future of Public Finance. Futures Forum. School of Planning, University of Waterloo, Waterloo, ON.

2022 **Pin, L.** Assessing Approaches to Encampment Policies: How to Address Needs Sustainably and Develop Effective Partnerships. Panel Discussion. Ontario Municipal Social Services Association

2022 **Pin, L.** Politics Beyond Politicians: Civic Engagement and Social Advocacy in Local Politics. Third Age Learning Kitchener Waterloo. Virtual Presentation.

## CONFERENCE AND WORKSHOP PRESENTATIONS

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2025 **Pin, L.**, Levac, L., Ajadi, T. (Moderators: Findley, T. and Bernhardt, N.) Roundtable: Intersectionality and Canadian Public Policy: Structure, Power and Politics. Canadian Sociological Association Annual Conference. George Brown College, Toronto, ON.

2025 **Pin, L.**, Major, R., Millar, H. (Moderator, Leval, L.). Workshop: Teaching through Fractious Elections and Contentious Policies. Canadian Sociological Association Annual Conference. George Brown College, Toronto, ON.

2024 **Pin, L.** Municipal Encampment Governance Through a Human Rights Lens. Canadian Sociological Association Annual Conference. McGill University, Montreal, QC.

2023 Haley, TL., ^Giles, M., ^Krostewitz, C., and **Pin, L.** Rent Banks in Canada: Promising Practices from a National Study. Canadian Alliance to End Homelessness Conference. Halifax Convention Centre, Halifax, NS.

2023 **Pin, L.** The Governance of Homeless Encampments in Canadian Municipalities. Critical Perspectives National Conference. Carleton Dominion-Chalmers Centre, Ottawa, ON.

2023 **Pin, L.** Participatory Action Research. Workshop delivered for the Social Development Centre, Region of Waterloo, Plan to End Chronic Homelessness. Kitchener, ON.

2022 **Pin, L.**, +Buchnea, A. A National Housing Strategy By And For Whom? Documented Experiences Of People With Living Knowledge Of Housing Need. Canadian Alliance to End Homelessness, Annual Conference, Toronto, ON.

2022 \*Levac, L., Haley, T., **Pin, L.**, Tungohan, E., and Wiebe, S.M. (2022, May). Advancing Transformative Policymaking Through Community-Engaged Research. Panel. Horizons: Crisis and Social Transformation in Community-Engaged Research. Simon Fraser University, Vancouver, British Columbia.

2021 \***Pin, L.** and Haley, T. Centering People with Lived Experience (PWLE): Community-Engaged Approaches to Research on Rural and Remote Homelessness. Workshop being presented at the Canadian Rural and Remote Housing and Homelessness Symposium. Guelph, ON.

2020 \*Bernhardt, N.S., **Pin, L.** Lessons Learned? The Past and Futures of Inclusion in Canadian Political Science. Workshop: Chilly Climates, Then and Now. Canadian Political Science Association Annual Conference (Congress), University of Western Ontario, London, ON. *Conference cancelled due to Covid-19.*

2020 \*Haley, TL., **Pin, L.**, and Phillips, E. Towards A Disability Positive Approach to Semi-Rural Homelessness. Paper being presented at the Housing First Partners Conference. Roosevelt Hotel, Seattle, WA. *Conference cancelled due to COVID-19*

2016 \*Gray, M. and **Pin, L.** Decolonizing Sexual Violence Organizing on Campus: Anti-Carceral and Anti-Racist Approaches. Presentation at the Decolonizing Conference. OISE University of Toronto, Toronto, ON

2014 **Pin, L.** Global Austerity and Local Democracy: Participatory Budgeting in Hamilton, ON. and Guelph, ON. Paper presented at the Bell Chair Graduate Student Conference. Carleton University, Ottawa, ON

## COMMUNITY KNOWLEDGE MOBILIZATION

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### Editorials and Professional Blogs

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

2023 Doucet, B. and **Pin, L.** Cities must take immediate action against 'renovictions' to address the housing crisis. *The Conversation*. <https://theconversation.com/cities-must-take- immediate-action-against-renovictions-to-address-housing-crisis-204170>

2020 +Morris, S., and **Pin, L.** Bill 184 and the Myth of Tenant Protection. *Policy Options*. Op-Ed. <https://policyoptions.irpp.org/magazines/september-2020/ontarios-bill-184-and-the-myth-of-tenant-protection/>

2020 \*Levac, L., **Pin, L.**, and +Rochefort, J. Understanding Community Data in Community. Blogpost. Canadian Research Institute for the Advancement of Women. <http://fnn.criaw-icref.ca/en/page/understanding-community-data-in->

### Public Lectures and Webinars

2023 **Pin, L.**, (moderator), Rainer, R., Janeiro, J., and Regehr, S. A. Why Canada Needs a Basic Income Guarantee. Laurier Centre for the Study of Canada Speaker Series. Panel. <https://studyofcanada.ca/event/why-canada-needs-a-basic-income-guarantee-a-panel-discussion/>

2023 **Pin, L.** (moderator). Dantzler, P., Rollwagen, H., and Simpson, S. Keynote Panel. Forum on Public Opinion and Housing Policy, Wilfrid Laurier University, Waterloo, ON.

2023 **Pin, L.**, (moderator), Dej, E., Lee, C., Draper, J., Down, S. and Schuitema, A. Charter Rights and the Encampment Ruling: What Does it Mean for Waterloo Region and Beyond? Laurier Centre for the Study of Canada. Virtual Panel. <https://www.youtube.com/watch?v=9dmHWpKpn4o>

2023 **Pin, L.** and Dej, E. Addressing Homelessness in our Communities. Inspiring Conversations Webinar Series. Wilfrid Laurier University. Virtual Lecture.

2021 **Pin, L.**, Garwood, K., and +Buchnea, A., and ^McPherson, D. Dangerous Disruptions: Local Intersections of Poverty and COVID-19 in Guelph-Wellington and Dufferin. Webinar in collaboration with Guelph-Wellington Taskforce for Poverty Elimination, Services and Housing in the Province, and A Way Home Canada. Guelph, ON.

2020 **Pin, L.**, +Philpott, E, and Levac, L. Women's Wellbeing in Happy Valley-Goose Bay. Results from the CVI Survey. Webinar in collaboration with Labrador-Grenfell Health. Labrador, NL.

2020 ^Maloney, P., **Pin, L.**, Levac, L. Sewing Workshop and Collaborative Data Analysis: Conversations about Women's Wellbeing in Happy Valley-Goose Bay. Workshop Series in collaboration with the Labrador Friendship Centre. Labrador, NL.

2020 Haley, T., ^O'Handley, C., **Pin, L.**, and ^Metcalfe, K. Housing and Poverty. "From the Margins: Communities Respond to COVID-19". Webinar hosted by the Live-Work-Well Research Centre. University of Guelph.

2020 Levac, L., Ramdatt, J., and **Pin, L.** Diversity and Inclusion Planning in the District of Kitimat. Workshop for City Councillors and Staff. Kitimat, BC.

2019 ^Maloney, P., ^Beals, P., **Pin, L.**, Levac, L. Sealskin Purse Making and Collaborative Data Analysis: Conversations about Women's Wellbeing in Happy Valley-Goose Bay. Workshop Series in collaboration with the Labrador Friendship Centre. Labrador, NL.

2019 Haley, T., and **Pin, L.** Findings from the Community Flex-Fund Program Evaluation. Presentation to Dufferin County Moves Community Development Council. Shelburne, ON.

2016 ^Chan, M., **Pin, L.**, ^Shupac, A. *Bike Lanes, On-Street Parking and Business in Parkdale.* Presentation to Parkdale BIA. Toronto, Ontario.

### News media, past 18 months

2023 Norris, Craig. (Nov 22). As municipalities work to address homelessness, how do they measure success?? CBC Kitchener-Waterloo. Radio Interview. <https://www.cbc.ca/news/canada/kitchener-waterloo/homelessness-how-to-measure-successful-programs-1.7039033>

2023 Pavia, Joe. (Oct 20). LISPOP Housing Forum Happening Today. CBC Kitchener-Waterloo. Radio Interview.

2023 McGinty, Joe. (Oct 6). Legal action in the cards after Cambridge encampment evictions. *Cambridge Today.* <https://www.cambridgetoday.ca/local-news/legal-action-in-the-cards-after-cambridge-encampment-evictions-7652134>

2023 CityNews Kitchener Staff. (Sep 28). Passionate delegations heard about homelessness at regional council, Soper Park evictions hot topic. *CityNews Kitchener.* <https://kitchener.citynews.ca/2023/09/28/passionate-delegations-heard-about-homelessness-at-regional-council-soper-park-evictions-hot-topic/>

2023 Bueckert, Kate. (Sep 17). Municipalities can't solve homelessness without more federal and provincial aid, experts say. CBC News Kitchener-Waterloo <https://www.cbc.ca/news/canada/kitchener-waterloo/homelessness-reports-waterloo-region-guelph-municipalities-fix-1.6968280>

2023 Mostaci, Madalyn. (Mar 2). Application to have homeless encampment removed declined by Ontario Superior Court of Justice <https://thecord.ca/application-to-have-homeless-encampment-removed-declined-by-ontario-superior-court-of-justice/>

2022 Sharpe, K. (Aug. 19). Waterloo region candidates list sparse with registration deadline looming. <https://kitchener.ctvnews.ca/waterloo-region-candidates-list-sparse-with-registration-deadline-looming-1.6025719>

2022 Outhit, J. (Jun 22). Evicting Kitchener Encampment is the Greatest Harm. The Record. <https://www.therecord.com/news/waterloo-region/2022/06/22/evicting-kitchener-encampment-is-the-greatest-harm-laurier-professor-says-after-studying-homeless-policies-in-other-cities.html>

2022 Jonkman, B. (Jun 10). Encampment Evictions with Dr. Erin Dej, Dr. Laura Pin, and Lesley Crompton. CKMS Community Connections. <https://radiowaterloo.ca/ckms-community-connections-for-10-june-2022-encampment-evictions-with-dr-erin-dej-dr-laura-pin-and-lesley-crompton/>

## **TEACHING**

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### **Graduate Courses**

2024, 22, 21 **Policy Research in Action (PO 691, PO 627)**  
Department of Political Science  
Wilfrid Laurier University

### **Undergraduate Courses**

2024 **Art and Science of Policy Design (PO 245)**  
Department of Political Science  
Wilfrid Laurier University

2022, 21 **Politics and Government in Canada (PO 263)**  
Department of Political Science  
Wilfrid Laurier University

2022 **Human Rights in Canada (PO 498)**  
Department of Political Science  
Wilfrid Laurier University

2022 **Public Policy Analysis (PO 345)**  
Department of Political Science  
Wilfrid Laurier University

2020 **Public Policy: Challenges & Prospects (POLS 3250)**  
Department of Political Science  
University of Guelph

2019 **Intergovernmental Relations in Canada (CPPA 425)**  
\*co-taught with Annelies Coopers  
Public Policy and Administration Program  
Toronto Metropolitan University & First Nations Technical Institute

2018, 17 **Canadian Politics and Government (CPPA 120)**  
Public Policy and Administration Program

Toronto Metropolitan University & First Nations Technical Institute

2017      **Canadian Urban Policy (POLS 4110)**  
            Politics Department  
            York University

## **GUEST LECTURES**

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2024      Doing Housing Research in Political Science. PSCI 662 Canadian Political Process. University of Waterloo, Waterloo, ON.

2024      Human Rights and Housing Fights. Lecture for Laurier Association for Life-Long Learning. Waterloo Memorial Recreation Complex, Waterloo, ON.

2023      The Right to Housing in Canada. POLAO1 Critical Issues in Politics: Human Rights and Equity. University of Toronto Scarborough, Toronto, ON.

2023      Housing as a Human Right. SHAD Laurier. Wilfrid Laurier University, Waterloo, ON.

2023, 22    Social Innovation Advisor. SE 364 Social Innovation in the City. Wilfrid Laurier University, Waterloo, ON.

2022      Qualitative Research Interviews. PO 217 Asking Questions in Political Science. Wilfrid: An Introduction to Research. Wilfrid Laurier University, Waterloo, ON.

2021      Community Engaged Research. PO 478 Social Science Theories. Wilfrid Laurier University, Waterloo, ON.

2021      Pandemic Disruptions and Engagements. UNIV2020 Creativity, Research, and Scholarship in a Time of Crisis. University of Guelph, Guelph ON.

2019      Community-Based Research Methods. Guest Lecture for SSH 301 Research Methods. Ryerson University, Toronto, ON.

2017      with Nicole Bernhardt. Equity in the Classroom. Teaching Assistant Workshop for Graduate Students. York University, Toronto, ON.

2016      Participatory Budgeting in Chicago. Guest Lecture for Great Cities Institute Lunch Series. Chicago, IL.

2016      Participatory Budgeting and Deliberative Democracy. Guest Lecture for POLS 6155 Democratic Administration. York University, Toronto, ON.

2016      Women and Politics. Guest Lecture for POLS 2910 Canadian Politics in Comparative Context.

## **COURSE DEVELOPMENT IN PROGRESS**

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### **Graduate**

2024      **Applied Public Policy Analysis (PO 604)**  
            Department of Political Science  
            Wilfrid Laurier University

## **STUDENT SUPERVISION**

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### **Academic Supervision**

2023-24      Valentina Ornelas, MAP student, Wilfrid Laurier University  
 Supervisor, Major Research Paper  
*Homelessness in Canadian Municipalities*

2023-24      Claire Rahija, MA student (Criminology), Wilfrid Laurier University  
 Second Reader, Thesis  
*Indigenous Perceptions of Indigenous-Led Housing Support Services*

2022-23      Abishane Suthakaran, MAP student, Wilfrid Laurier University  
 Supervisor, Major Research Paper  
*The covert effects of gentrification: A case study of South Parkdale*

2022-23      \*Nathan R.G. Barnett, MAP student, Wilfrid Laurier University  
 Supervisor, Major Research Paper  
*“People Will Notice That Level of Silence Way More”: How Identity-Based Language in School Board EDI Policies Shapes LGBTQ+ Students’ Belonging*  
 \*Department nominee for the Medal for Academic Excellence

2022-23      Ranjit Saini, MAP student,  
 Second Reader, Policy Analysis Major Research Paper  
*Housing Supply and Affordability in Ontario: A Policy Analysis of the More Homes, Built Faster Act, 2022*

### **Post-Graduate and Graduate Research Assistants**

2023-24      Valentina Ornelas, MAP student, Wilfrid Laurier University

2023-24      Matthew Arp, PhD, Research Associate, Wilfrid Laurier University

2023-24      Melih Sahin, PhD Student, Wilfrid Laurier University

2023      Nathen Ermeta, MAP student, Wilfrid Laurier University

2023      Siobhan Saravanamuttu, PhD candidate, York University

2022-23      Lia Forma, Postgraduate MSW, Wilfrid Laurier University

2022-23      Abishane Suthakaran, MAP student, Wilfrid Laurier

2022-23      Tracey Sebastien, MA student, Wilfrid Laurier University

2022      Victoria Marshall, MAP, Wilfrid Laurier University

2020      Erin Rodenburg, PhD Student, University of Guelph

2019-20      Julie Rochefort, PhD Student, University of Guelph

### **Undergraduate Research Assistants**

2024      Sebastian McPherson, Political Science, Wilfrid Laurier University

2023-24      Maria Andriyovych, Law & Society, Wilfrid Laurier University

2023      Gabrielle Russo, Political Science, Wilfrid Laurier University

2022      Laith Adi, Computer Science, Wilfrid Laurier University

2021-23      Paul Berthelot, Political Science, University of Guelph

2020-21      Jee-Ho Paik, Political Science, University of Guelph

2020-21      Leen Rhazi, Political Science, Mount Holyoke College

2020 Sabina Morris, Political Science, Mount Holyoke College

2019-21 Arfi Haig Yusuf, Political Science, York University

### **Community-Based Research Assistants**

2023-24 Regan Brusse, Kitchener, ON

2022-23 Michael Ryan, Orangeville, ON

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### **PROFESSIONAL DEVELOPMENT**

2023 Teaching with Generative AI. Virtual seminar. Laurier Centre for Teaching Excellence and Innovation.

2023 Thinking Qualitatively: Doing Intersectionality (TQ:DI). Virtual Workshop. University of Alberta. <https://www.ualberta.ca/events/arts/thinking-qualitatively-doing-intersectionality-tqdi.html>

2023 Social Housing and Human Rights Conference and Workshop. Manitoba Research Alliance, Winnipeg, MB. <https://mra-mb.ca/social-housing-and-human-rights/>

2022-23 Systems Planning Collective Community of Practice. Monthly Workshops. Canadian Observatory on Homelessness

2019 Digital Storytelling: Method and Practice. Workshop. Re\*Vision Centre for Art and Social Justice. University of Guelph, Guelph, ON.

2019 Community-Based Research II. Society for the Study of Social Problems. Roosevelt Hotel, New York, NY. Workshop.

2018 Community-Based Research I. Society for the Study of Social Problems. Hotel 201, Philadelphia, PA. Interactive Workshop.

2015 TA Certificate in Teaching (TACT). York University Teaching Commons, Toronto, ON. SEDA Accredited Certificate Course

2015 Advanced Research Design Seminar. Institute for Social Research, York University, Toronto, ON. Certificate Course.

2015 Conducting Focus Groups for Social Research. Institute for Social Research, York University, Toronto, ON. Interactive Workshop.

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### **ACADEMIC SERVICE**

#### **Department**

2022, 2023 Member, Department Co-op Committee

2023 Judge and Keynote Speaker, Policy Pitch Competition, Wilfrid Laurier Association of Political Science Students (APSS)

2023 Program advisor, development of PO311e OC: The Global Politics of Land

#### **Faculty**

2024-present	Member, Faculty of Arts Part Time Appointments Committee (PTAC)
2023-present	Member, Faculty of Arts Curriculum Committee
2022-2023	Alternate member, Faculty of Arts Part Time Appointments Committee (PTAC)

## **University**

2023-2024	Acting Director, Laurier Institute for the Study of Public Opinion and Policy (LISPOP)
2022-present	Board Member, Laurier Institute for the Study of Public Opinion and Policy (LISPOP)
2021-present	Affiliate, Laurier Centre for the Study of Canada (LCSC)

## **PROFESSIONAL SERVICE**

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### **Memberships**

2015-present	Canadian Political Science Association (CPSA)
2023-2024	Canadian Sociological Association (CSA)
2018-2022	Urban Affairs Association (UAA)
2018-21	Society for the Study of Social Problems (SSSP)
2017-18	American Political Science Association (APSA)

### **Peer Review**

2025	Canadian Review of Social Policy x1
2023, 2024	Engaged Scholarship Journal x2
2024	Manitoba Research Alliance x1
2023, 2024	International Journal on Homelessness x2
2023	Canadian Journal of Political Science x1
2022	Sociological Forum x1
2022	Local Development and Society x1
2021	Springer Books US x1
2020	Between the Lines x1 (no extant documentation available)

### **Conference Service**

2024	Lead organizer, Sustaining Shared Futures...for whom? Solidarity Workshop and Conference. Centre St. Pierre, Montreal, QC.
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2024	Discussant. Early Career Research Panel. Sustaining Shared Futures...for whom? Solidarity Workshop and Conference. Centre St. Pierre, Montreal, QC.
2023	Lead organizer, Forum on Public Opinion and Housing Policy, Wilfrid Laurier University, Waterloo, ON.
2023	Discussant x2, Canadian Political Science Association Annual Conference, York University, Toronto, ON.
2022-23	Organizer, two sessions of monthly community of practice meeting, Systems Planning Collective, Canadian Observatory on Homelessness
2022	Organizer, Forum on Public Opinion and Housing Policy. Wilfrid Laurier University, Waterloo, ON.
2022	Discussant x1, Chair x1, Canadian Political Science Association Annual Conference
2021	Committee Member, Best Student Paper Award, Society for the Study of Social Problems Annual Conference (no extant documentation available)
2019	Discussant x1, Chair x1, Canadian Political Science Association Annual Conference

## **COMMUNITY SERVICE**

2023-present	Member. National Encampment Litigation Strategy Working Group.
2022-present	Member. Social Development Centre, Waterloo Region. Waterloo Region, ON.
2022-2024	Volunteer. A Better Tent City (ABTC). Kitchener, ON.
2021-2023	Facilitator. Dufferin Lived Experience Collective. <a href="http://www.dufferinchange.ca">www.dufferinchange.ca</a> Dufferin County, ON.
2023	Informal consultant on municipal advisory committees. Office of the Clerk. City of Waterloo. Waterloo, ON.
2022	Moderator. Election Town Hall on Homelessness in Waterloo Region. Unsheltered Campaign and Social Development Centre. Virtual Town Hall.

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JOANNA MULLEN  
A Commissioner, etc.,  
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LSO#: 64535V

# The Plan to End Chronic Homelessness

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Co-Creator Roundtable

March 20th, 2025

# Welcome!

- Name and role, connection to the work or what brought you here today
- [OPTIONAL PROMPT]
  - First official day of spring!!
  - What makes spring “official” for you?

**The Plan**

to End Chronic  
Homelessness

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#ThePlanWR

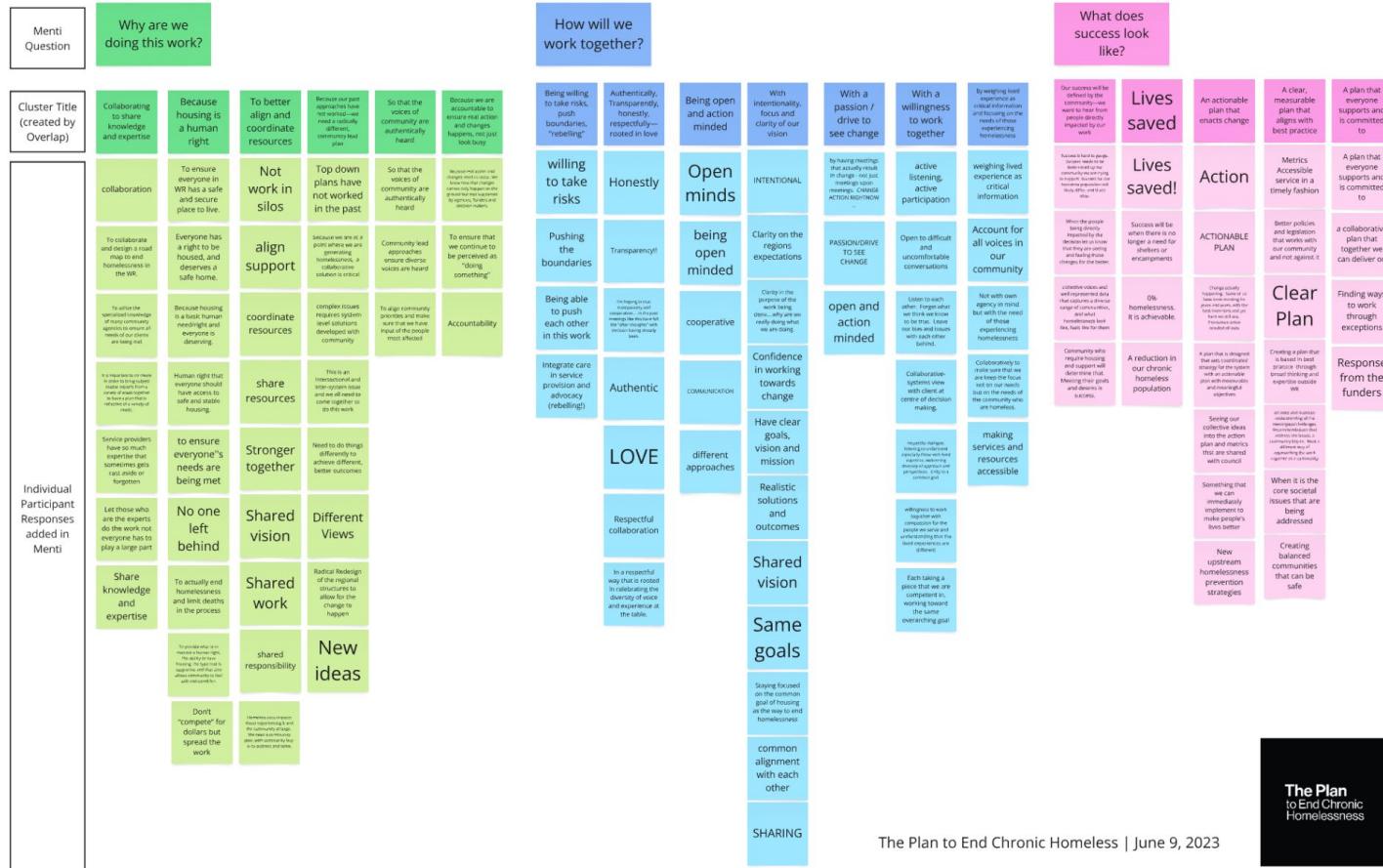
# Agenda

- Welcome and Context Setting
- The People's Purse Networking and Voting
- PECH Coordination Team Nomination Process Launch
- Caring for our Talent Discussion
- General Updates on PECH Activity
- People's Purse Voting Results Announcement
- Closing and Next Steps

# People's Purse Networking and Voting

**Co-Creator Guiding Document\_vDRAFT**

This is a light synthesis of participant responses in Mentimeter during the May 31st Co-Creator Group Roundtable. This is the start of a co-developed guiding document for the group. We will use this a touchstone throughout our work to ensure alignment with these principles.



# Why are we doing this work?

- Collaborating to share knowledge and expertise
- Because housing is a human right
- To better align and coordinate resources
- Because our past approaches have not worked—we need a radically different, community lead plan
- So that the voices of community are authentically heard
- Because we are accountable to ensure real action and changes happens, not just look busy

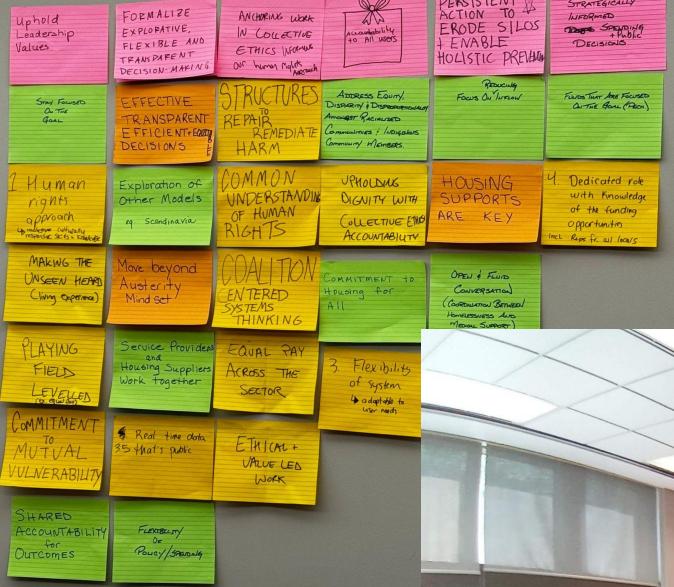
# How will we work together?

- Being willing to take risks, push boundaries, "rebelling"
- Authentically, Transparently, honestly, respectfully—rooted in love
- Being open and action minded
- With intentionality, focus and clarity of our vision
- With a passion / drive to see change
- With a willingness to work together
- By weighing lived experience as critical information and focusing on the needs of those experiencing homelessness

# What does success look like?

- Our success will be defined by the community—we want to hear from people directly impacted by our work
- Lives saved!
- An actionable plan that enacts change
- A clear, measurable plan that aligns with best practice
- A plan that everyone supports and is committed to

THE AOC  
WILL:



## Mid-Project Key Findings

September 12, 2023

IN COMMUNITY, BY COMMUNITY, FOR COMMUNITY.

#ThePlanWR



**Navigating Complexity Together**  
A Roadmap to Functional Zero  
by 2030

IN COMMUNITY,  
BY COMMUNITY,  
FOR COMMUNITY.  
EVERYONE

The Plan  
to End Chronic  
Homelessness

**It may be that when we no longer know what to do  
we have come to our real work,  
and that when we no longer know which way to go  
we have come to our real journey.**

—Wendell Berry, Our Real Work

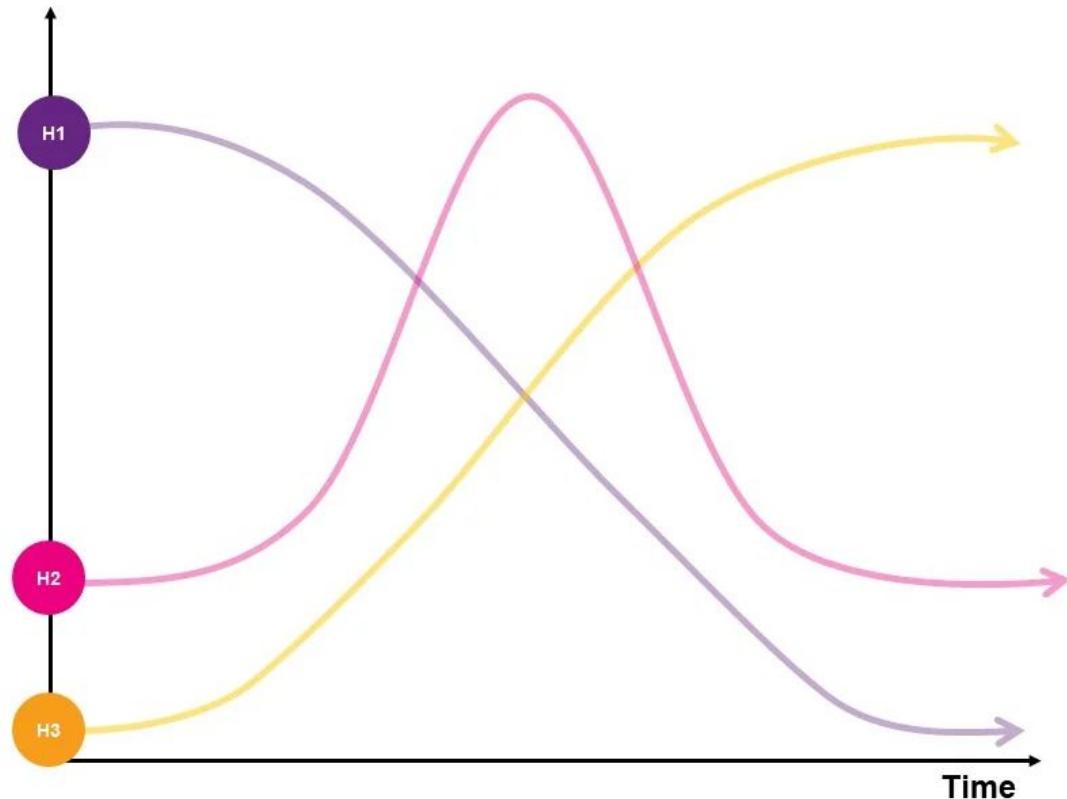
# Where we are in this moment...

## 3 Horizons Model

**Horizon 1 (H1)** represents the current system, or the paradigm of 'business as usual'.

**Horizon 2 (H2)** represents innovations which, if appropriately developed, can help bring about a different system.

**Horizon 3 (H3)** represents the desired future system.



# Activity Instructions

- If there are representatives connected to each of the Submissions please raise your hand
- This time is for voters to meet applicants (if you haven't already) and learn more about their submission
- The voting poll is currently open, so feel free to vote if you have made your decision
- Sean and Sam are on hand to answer any of your voting strategies and a “polling station” has been set up for those who need access to a device

# Voting Process, Instructions and Strategy

- As you prepare to review submissions/projects we have some tips and strategy for you to consider:
- You will rate each project on a scale from no support to full support (0 - 100)
- The "do not support" (0) option is important. If you don't think a project should be funded be sure to use this option and name that.
- Pay attention to your top pick but also every score you put in matters.

# **Voting Process, Instructions and Strategy**

- Allocate resources to your favourite project truthfully, avoid strategic voting.
- Think about the broad goals of the allocation but we are relying on your judgement for scoring. There is no formal rubric for you to score against. It comes down to your judgement on what is proposed and who is proposing it.
- Your scores will all be combined together to lead to the decision of what projects move forward into action.



[agorapolls.com/v/kwy](http://agorapolls.com/v/kwy)

# Coordination Team Scope + Next Steps

## Purpose and Function

Our Key Findings Report from Fall 2023 called for a shift to increased community governance and decision-making. The intention of this shift is to create greater equity, transparency, and trust within the Housing Stability System. In response to this learning the PECH included Action 2.1, which directs our group to "establish an All of Community Leadership Model". This prototype is that model.

**In order to transform the system and how our community responds to homelessness the Structure will:**

- Set and continually evaluate a shared community vision by:
  - Upholding human rights in our values, goals and actions
  - Acknowledging and addressing systemic harms and barriers
- Hold the system and everyone in it accountable by:
  - Formalizing transparent, explorative, and flexible decision-making and outcome evaluation
  - Making strategically informed and transparent spending decisions
- Build an inclusive system and community culture by:
  - Anchoring our work in collective ethics informed by our human rights approach
  - Taking persistent action to erode silos and enable holistic prevention

**PECH implementation is the current focus and we envision this structure living beyond 2030 to guide our community's ongoing response to homelessness.**

## Key Features / Elements

#### Community Need / Shared Cause

The Housing, Health and Homelessness Crisis in our Region is our mobilizing need or opportunity in which working together will achieve individual and shared outcomes. This need and/or opportunity is described as a "magnetic attractor", as it is the force which defines the scope of the ecosystem of activity.

**Co-Creator Group: The Strategic Visionaries**—(Open to all Community Members, System and Strategic Level Discussions)  
A representative stewardship group that sets the vision and mission of our community's response to our need/shared cause—homelessness.

**Shared Vision**—1) To reach functional zero chronic homelessness in Waterloo Region by 2030 2) Housing Stability System that is an integrated, inclusive, adaptive, responsive and sustainable ecosystem.

**Guiding Documents**

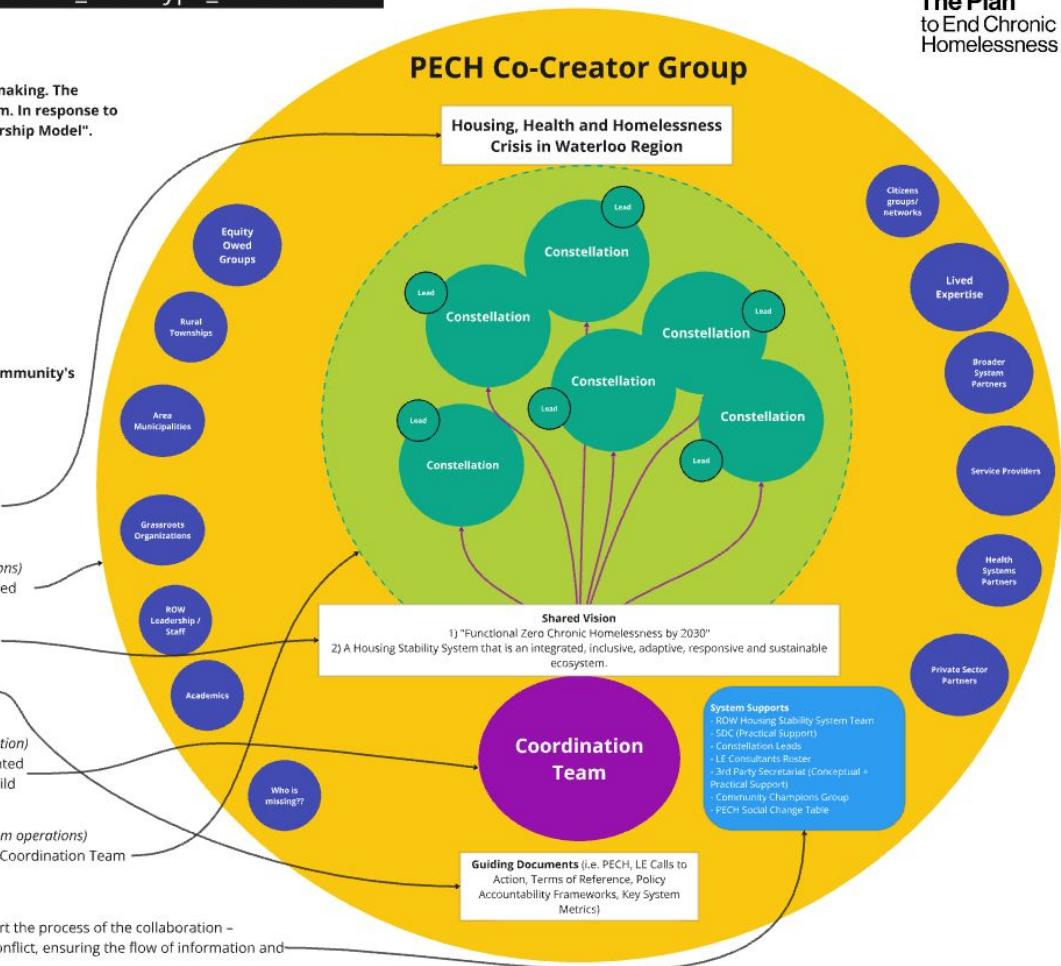
The guiding documents articulate the way that the partners or members want to work together, describes the roles and responsibilities of the various players and clearly defines the goals and priorities of the group.

**Coordination Team: The Planful Stewards**—(10-15 Members, Management of PECH Implementation / Operationalization) A small, nimble, group that coordinates the action of the Constellations - ensuring that the PECH is being implemented / the vision and mission set by the Co-Creator Group is “cared for” and enacted. An additional role of the CT is to build equity capacity and collective impact lenses to the work of PECH implementation.

**Constellations: The Focused Implementors**—(*Implementation / Operationalization of PECH Actions and related system operations*) Revolving and ad-hoc teams that form to respond to specific topics and/or implement individual PECH Actions. The Coordination Team evaluates the need for and potential scope for each Constellation.

#### Secretariat: The Third-Party Catalyst and Capacity Builder

The role of the secretariat is to act as a third-party catalyst and capacity builder for the group. Their role is to support the process of the collaboration – guiding the group through the various planning stages, facilitating meetings, incubating constellations, mediating conflict, ensuring the flow of information and generally building the capacity of the group to work towards the desired outcome.



# Overview:

## Who:

The Coordinating Team will include 11 representatives and is made up from members of the existing PECH Co-Creator group, including (at minimum):

- Manager of the Plan to End Chronic Homelessness (ROW)
- Manager of Homelessness & Supportive Housing (ROW)
- Minimum of two people with lived/living expertise of homelessness
- Minimum of three people with lived/living expertise of systems barriers due to equity

## Commitment:

- 10-15 hrs a month (including meetings/prep time, etc.)
- 1 year commitment (possibility of one year extension)
- No expectation of unpaid work

# Scope: First Key Area

**Equity and Partner Relations:** This role involves maintaining a consistent systems analysis to ensure equity and lived expertise are central to the Plan to End Chronic Homelessness, while also engaging in community development to support social and structural change.

# Scope: Second Key Area

**Systems Level Guidance and Coordination:** This role provides guidance for system-level responses, including visioning and building systems change, makes resource allocation recommendations based on participatory models and community-aligned decision-making, and collaborates to establish and implement change management processes and accountability measures to advance the Plan to End Chronic Homelessness.

# Scope: Third Key Area

**Actioning the 'All of Community' Model:** This role supports the "all of community" model by empowering constellations, co-creators, lived experts and other partners to move from theory to action and launch their systems change work. It ensures progress and alignment toward the goal of ending chronic homelessness.

# The Vote

- **To Run:** Any current co-creator or lived expert can self-nominate.
- **To Vote:** You will need to perform an act. You will see papers on the table, sign your initials on ‘yes’ or ‘no’ regarding whether you want a vote. Those not here will be emailed this question and will need to respond
- **Ranked Ballet:** You will have the chance to look at people’s profiles and choose your top five applicants for the coordinating team.

# **\*Transition to Mentimeter\***

- In the form of questions, what do you want to know from people who are self-nominating to be a member of the coordinating team?

# Caring for our Talent Discussion

# PECH General Updates

# People's Purse Voting Results

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**RE: [EXTERNAL \*] Can we chat ASAP**

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**From** Jennifer Gordon <jegordon@regionofwaterloo.ca>

**Date** Mon 4/14/2025 1:46 PM

**To** Erin Dej <edej@wlu.ca>; Laura Pin <lpin@wlu.ca>

**Cc** Ryan Pettipiere <RPettipiere@regionofwaterloo.ca>

Thanks folks,  
Just sent the invite for 4 pm. Will keep things tight to respect time.  
Jen

---

**From:** Erin Dej <edej@wlu.ca>

**Sent:** April 14, 2025 1:36 PM

**To:** Laura Pin <lpin@wlu.ca>; Jennifer Gordon <jegordon@regionofwaterloo.ca>

**Cc:** Ryan Pettipiere <RPettipiere@regionofwaterloo.ca>

**Subject:** Re: [EXTERNAL \*] Can we chat ASAP

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I can meet at both of those times, although in both cases it will have to be brief. Teams and phone work well for me. Teams might be preferable as I have an Android phone which doesn't always align with Apple phones in terms of a conference call.

Erin

---

**From:** Laura Pin <lpin@wlu.ca>

**Sent:** Monday, April 14, 2025 1:34 PM

**To:** Jennifer Gordon <jegordon@regionofwaterloo.ca>; Erin Dej <edej@wlu.ca>

**Cc:** Ryan Pettipiere <RPettipiere@regionofwaterloo.ca>

**Subject:** Re: [EXTERNAL \*] Can we chat ASAP

Hi Team,

I am available at 4pm today or 11:00-11:30am tomorrow. Teams or phone would work equally well for me (647 781 6940)

Best,

Laura

---

**From:** Jennifer Gordon <jegordon@regionofwaterloo.ca>

**Sent:** Monday, April 14, 2025 1:29 PM

**To:** Laura Pin <lpin@wlu.ca>; Erin Dej <edej@wlu.ca>

**Cc:** Ryan Pettipiere <RPettipiere@regionofwaterloo.ca>

**Subject:** [EXTERNAL \*] Can we chat ASAP

Hi folks,

Thanks for throwing over the updated Frameworks one pager. We've shopped it around our internal voices and it looks great for moving forward. This excites me a lot.

In a full transparency, something is coming down this week that I'd like to get into the open as it runs along side this and our work together.

Do you have a half hour this afternoon (one or both of you, both preferred)?

Ryan and I can be flexible to your schedule. We can do it over the phone or teams, whatever suits.

Jen

Jennifer Gordon  
Manager, The Plan to End Chronic Homelessness  
Community Services, Region of Waterloo  
99 Regina St, Waterloo  
Cell: 519-505-0295 | Email: [jegordon@regionofwaterloo.ca](mailto:jegordon@regionofwaterloo.ca)

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## Why are Police and Bobcats at 100 Victoria?

From Laura Pin <lpin@wlu.ca>

Date Wed 4/16/2025 1:57 PM

To amanda.mcguiremartin@ontariohealthathome.ca <amanda.mcguiremartin@ontariohealthathome.ca>; Regan Brusse <reganbrusse@gmail.com>; leahdrewrich@gmail.com <leahdrewrich@gmail.com>; Kristy Sawatzky <kristy@compassrefugee.ca>; 'jeff.willmer@gmail.com' <jeff.willmer@gmail.com>; oluseun@adventure4change.org <oluseun@adventure4change.org>; Fadhilah Balogun <fadhilahb@yahoo.com>; David dirks <daviddirks@rogers.com>; Mikael Beijom <mikaelbeijbom@gmail.com>; Linda Terry <terrylinda44@gmail.com>; Sharon Livingstone <srlogan43@gmail.com>; lori@caeh.ca <lori@caeh.ca>; Wayne Paddick <wpaddick@cambridgesheltercorp.ca>; imorton@cambridgesheltercorp.ca <imorton@cambridgesheltercorp.ca>; Tracy Elop <telop@caminowellbeing.ca>; mharrigan@cmhaww.ca <mharrigan@cmhaww.ca>; ccrocker@cmhaww.ca <ccrocker@cmhaww.ca>; bvisser@cmhaww.ca <bvisser@cmhaww.ca>; Diane Goodwin (goodwins4@sympatico.ca) <goodwins4@sympatico.ca>; Anne Tinker (anneltinker@gmail.com) <anneltinker@gmail.com>

Hello Co-Creators,

I am writing to ask for some transparency and accountability with respect to the presence of police officers and bobcats at the 100 Victoria Street encampment. To my knowledge, police and bobcats have been at 100 Vic since 1pm today.

Specifically, I would like the whole table to know why this equipment has been deployed, and who made a decision to deploy it.

I know all of us that participate in this table are committed to working collaboratively and through a human rights framework and this sort of transparency is necessary if we have any hope on either of those fronts

Best,

Laura

Dr. Laura Pin (she/her)  
Assistant Professor  
Political Science Department

MAP your future in Political Science at Laurier!  
Learn more at: <http://wlu.ca/programs/arts/graduate/applied-politics-map>

*Wilfrid Laurier University is located on the territory of the Neutral, Anishnaabe and Haudenosaunee peoples on the Haldimand Tract. The Six Nations of the Grand River now now reside on less than five per cent of the original Haldimand Tract territory agreed to in treaty by the British.*

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## [EXTERNAL \*] Update on 100 Victoria Street

From Peter Sweeney <PSweeney@regionofwaterloo.ca>

Date Wed 4/16/2025 2:46 PM

Hello everyone,

We heard from some of you today about the changes to the site, including more garbage bins and a trailer that was put on site to facilitate meetings with residents.

Sharing an update with you today on the development of the Kitchener Central Transit Hub is entering a new phase, and the Region's property at 100 Victoria will be required later this year. As most of you know, the property was set for this purpose, and we committed to sharing that with you and with the community once a timeframe was confirmed. We're doing that today.

Regional Council will be considering a new report, [available online here after 4 p.m. today](#), for discussion at Council on April 23, 2025. The report includes a recommendation for a new bylaw for 100 Victoria Street that will facilitate the transition of the site for transit hub by December 1<sup>st</sup>, 2025. The report also includes a recommendation that Council provide additional housing resources to support those currently residing at 100 Victoria to transition to safer, alternative accommodations before that time. Over the coming months, Housing Services staff at the Region will work with residents of 100 Victoria and support them to access services that meet their needs.

Tomorrow, Ryan Pettipiere and I will be available to Co-Creators to answer questions and discuss this in more detail. Please join us tomorrow as your schedule allows:

- In person from 1:00 p.m. to 2:00 p.m. at the Kitchener Public Library (85 Queen St N, Kitchener)
- Online via Zoom at 2:30 p.m. ([zoom link here](#))
- 

We will provide more information and answer your questions tomorrow. Please note this is an invitation to active members of the Co-creators only. Further communication for other interest holders and the community is also planned.

We know that this is short notice. If you are unable to make it tomorrow, please reach out to Janet Boyd at [jboyd@regionofwaterloo.ca](mailto:jboyd@regionofwaterloo.ca) who can help arrange a connection with us next week.

Sincerely,  
Peter

\* **⚠️ Notice:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

THIS IS **EXHIBIT “F”** REFERRED TO  
IN THE AFFIDAVIT OF LAURA PIN  
SWORN REMOTELY AT THE CITY  
OF HAMILTON BEFORE ME AT THE  
COUNTY OF WELLINGTON DURING  
A VIDEOCONFERENCE IN  
ACCORDANCE WITH O.REG. 431/20,  
ADMINISTERING OATH OR  
DECLARATION REMOTELY THIS 9<sup>th</sup>  
DAY OF JULY, 2025



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JOANNA MULLEN  
A Commissioner, etc.,  
Province of Ontario,  
While a Barrister and Solicitor.  
LSO#: 64535V

# Realizing the Right: Municipal Policy Responses to Encampments

## Waterloo Region Snapshot

This research project is called “Realizing the Right: Municipal Policy Responses to Encampments”. Funded through the Social Sciences and Humanities Research Council of Canada (SSHRC), Realizing the Right is a multi-year community-engaged project focused on understanding of how Ontario municipalities are responding to encampments. The project is made up of:

- An Ontario-wide review of all neo-vagrancy bylaws and protocols in municipalities with populations over 80,000;
- A review of legal cases concerning encampments in Ontario; and
- The Realizing the Right Encampment Survey of people with direct experience staying in encampments in Waterloo Region and Hamilton.

This research snapshot shares our preliminary findings from the encampment survey from people with experience staying in encampments in Waterloo Region exclusively<sup>1</sup>.

## The Realizing the Right Encampment Survey

The survey was developed by the project advisory team which includes academic researchers, people with lived experience (PWLE) of homelessness, and people with connections to local homelessness service providing organizations. Many project advisors have expertise that draws on multiple categories.

To develop the survey questions, we drew the expertise of our advisory team, as well as foundational documents that outline what a human rights-based approach to encampments might look like in the Canadian context. These documents include:

- A National Protocol for Homeless Encampments in Canada, UN Special Rapporteur on the Right to Housing, 2020;
- The Decampment Report Card, Pivot Legal Society, 2021;
- Statement on Encampments, Ontario Human Rights Commission, 2022; and

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<sup>1</sup> This research snapshot was compiled by Dr. Laura Pin, Regan Sunshine Brussé, and Dr. Erin Dej in July 2025.

- Overview of Encampments Across Canada: A Right to Housing Approach, Canadian Human Rights Commission, 2022.

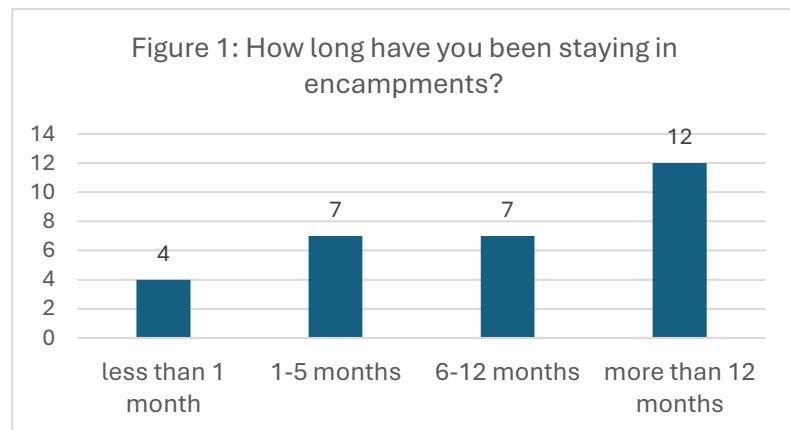
These foundational documents are important because they describe our domestic and international human rights obligations, and how they intersect with municipal encampment responses. Drawing on these documents, the Realizing the Right Encampment Survey was organized around five themes of a human rights approach to encampments:

1. Decentering police and law-enforcement in municipal responses
2. Meeting basic needs
3. Equitable access to service provision
4. Meaningful participation in decision-making
5. Upholding Indigenous rights.

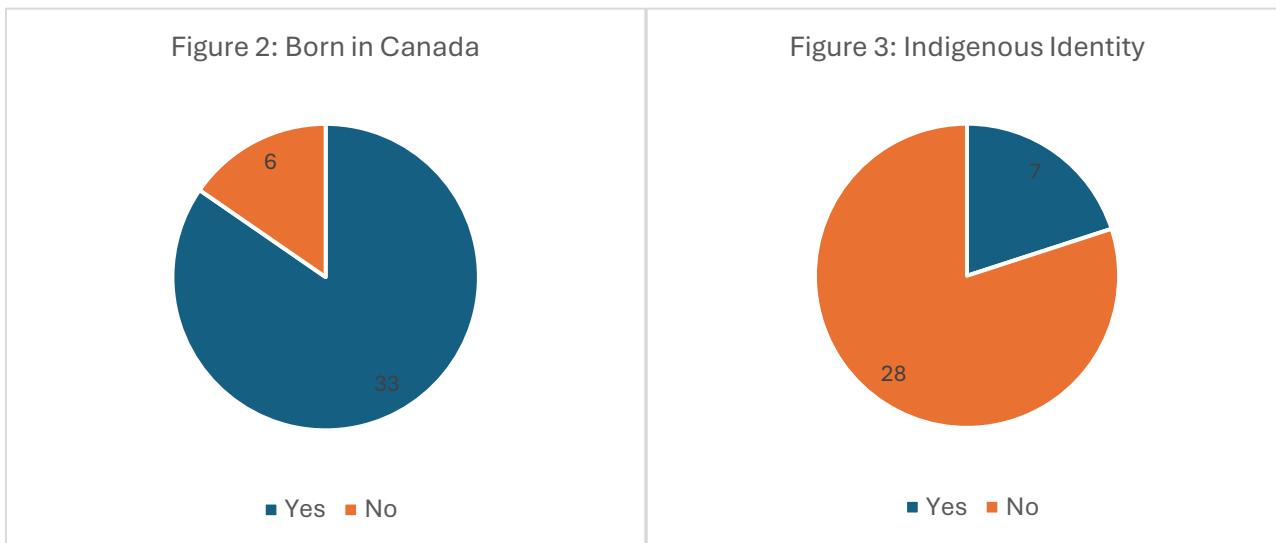
Waterloo Region surveys were conducted between May 1<sup>st</sup> 2025 and June 30<sup>th</sup> 2025, at locations in Kitchener and Cambridge. Surveys took between 15 and 45 minutes to complete. The project had Wilfrid Laurier University Research Ethics Board (REB) approval, and all members of the research team completed REB ethics training, as well as training with a trained outreach worker. Overall, 41 surveys were completed. Some respondents declined to answer certain questions, so the number of individual responses to each question may vary, and this is noted in our discussion of data.

## Findings

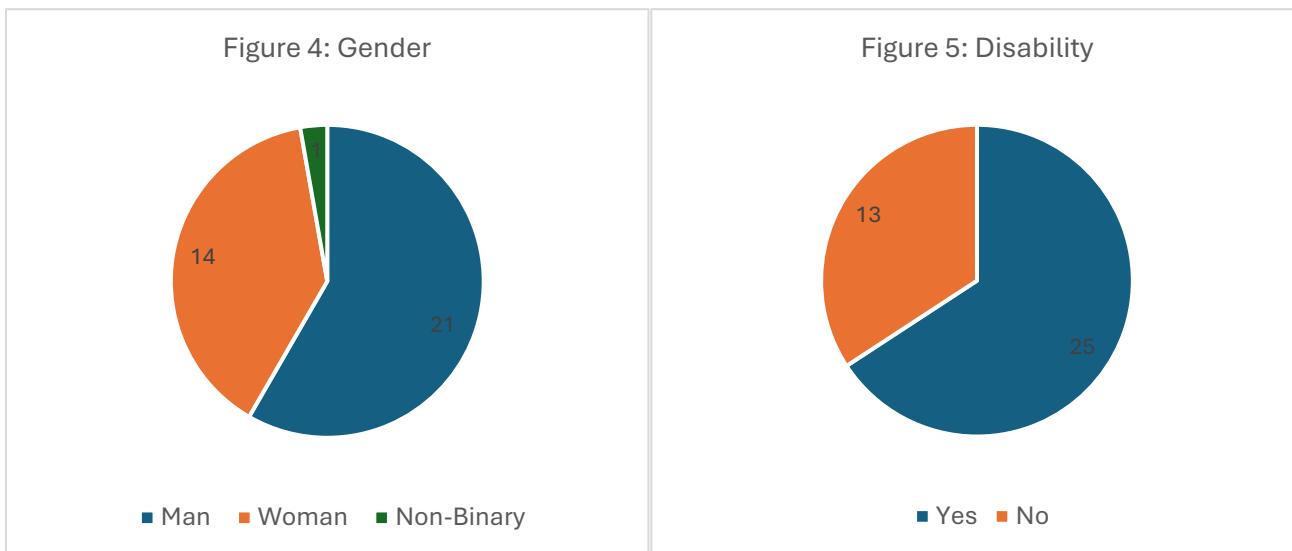
All people responding to the survey were either currently staying in an encampment (n=30), or had stayed in an encampment in Waterloo Region in the past year (n=11). Of the people currently staying in a camp, most had been staying in camps for more than 6 months (n=19), and many for more than 12 months (n=12) (Figure 1). During their time staying in camps, 16 reported staying alone, while other individuals reported staying with romantic partners, friends, family members, and their community or chosen family. One individual described experiencing family separation due to homelessness.



We also asked respondents several demographic questions. Most respondents reported being born in Canada (Figure 2). Some respondents identified as Indigenous, though many did not (Figure 3).

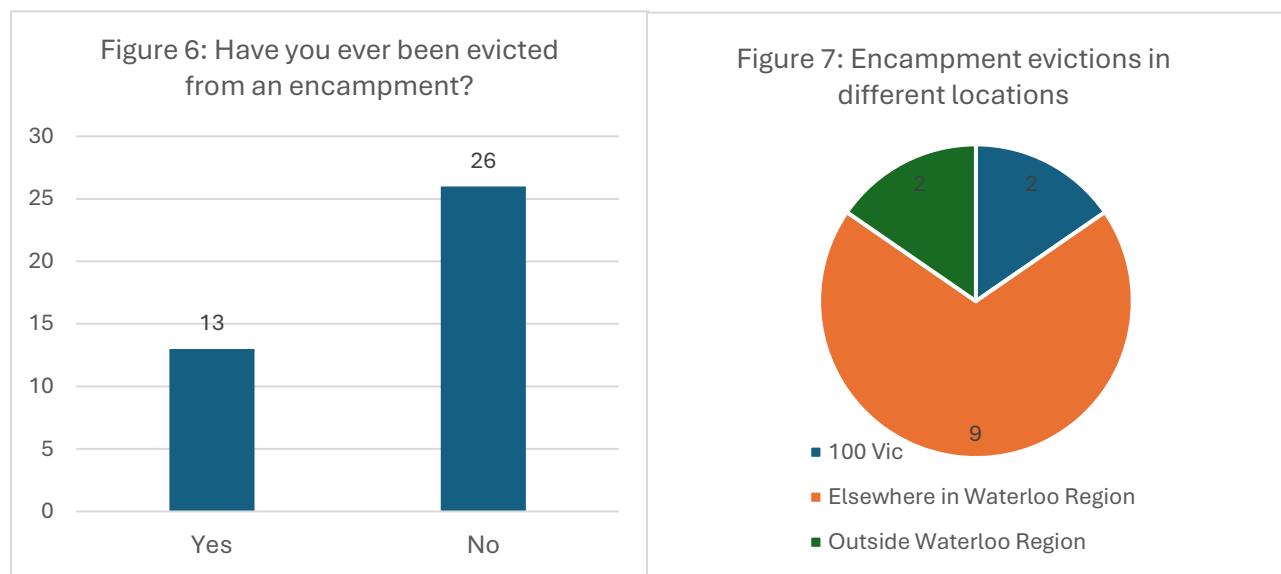


More respondents identified as men than women, with only one respondent identifying their gender as non-binary (Figure 4). More than half of the respondents identified themselves as having a disability that affected their day-to-day life (Figure 5). Finally, most respondents were between the ages of 30 and 50, with 40-49 the most frequent age bracket (14 of 36 respondents). Overall, demographic data indicates that in comparison with census data for Waterloo Region, individuals completing the survey are more likely to be Indigenous, have a disability, and identify as male, findings that are both consistent with research on homelessness and encampments more broadly.



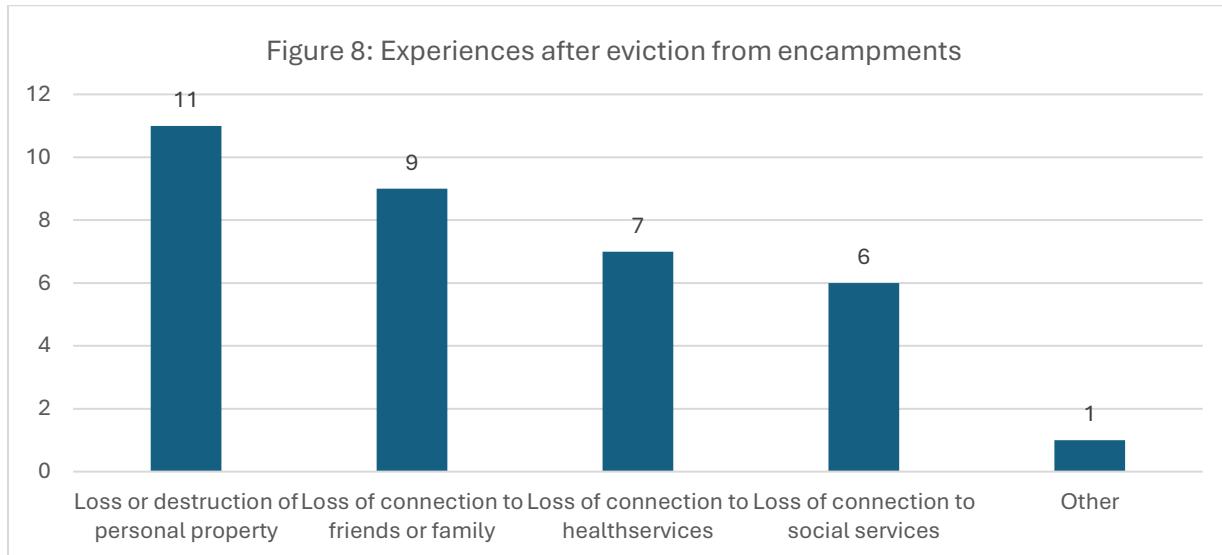
## Forced Removal from Encampments

Of 39 survey responses, 13 people reported being forced to leave a camping location when they would have preferred not to, typically by bylaw or police officers (Figure 6). Of the 13 individuals describing encampment evictions, only two individuals described being evicted from 100 Vic. In contrast, nine individuals described experiencing evictions at other locations in Waterloo Region, often multiple evictions, with six individuals stating they had been forced to move more than five times. An additional two respondents described encampment evictions occurring outside of Waterloo Region (Figure 7). Overall, these data suggest that individuals staying at 100 Vic are less likely than people staying at other locations in Waterloo Region to experience forced removal from encampments, which is important for the survival, health, and wellbeing of people experiencing homelessness, as forced eviction is associated with a number of harms, as discussed in the following paragraph.



For individuals who had been forced to leave a camping location, we asked how that experience affected their personal property, their social connections, and their contact with health and social services. Of the 13 individuals who were forced to leave an encampment, 12 reported experiencing at least one harm, and eight reported experiencing multiple forms of harm. Documented harms were the loss of personal property, the loss of connection to friends and family, and a decreased ability to access health and social services (Figure 7). Several individuals provided additional details, or noted other harms, including a loss of identification which then compromised their ability to access social assistance and the loss of important personal items like family photos. The expressions

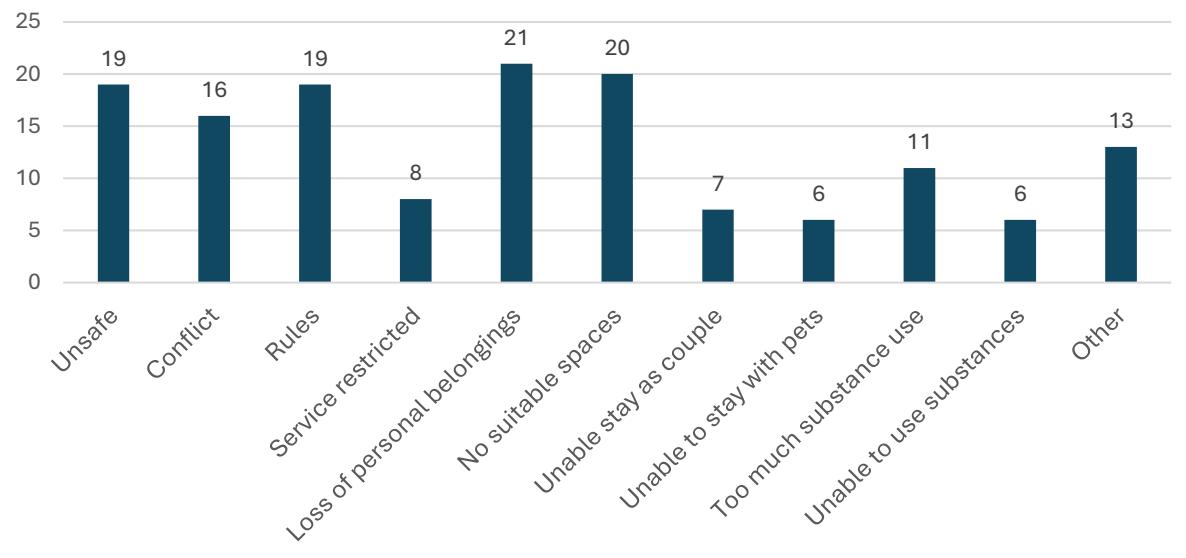
respondents used to describe these experiences included being left “high and dry” and being “bulldozed”.



## Barriers to Emergency Shelter

Respondents were asked about any barriers that had prevented them from accessing an emergency shelter (Figure 9). All respondents, except for one (n=40), reported at least one barrier to staying at an emergency shelter, with many respondents reporting multiple barriers. The presence of barriers to emergency shelter was the most consistent finding among survey respondents. The most cited barriers were a loss of personal belongings (n=21), no suitable shelter spaces available (n=20), being unsafe (n=19), and restrictive rules (n=19). Other reasons noted by respondents included an inability to stay as a couple at a shelter, an inability to stay with pets at a shelter, too much substance use present at shelters, an inability to use substances at shelters, and interpersonal conflicts. The contrasting views on substance use emphasize the heterogeneity of encampment residents, and the need for individualized and person-centered approaches to meet diverse needs.

Figure 9: While staying at a camp, has any of the following prevented you from accessing an emergency shelter?



Some respondents noted additional barriers to staying at emergency shelter under the “other category”. These included accessibility barriers, especially experiencing distress in crowded spaces, unavailability of women’s shelter spaces in Cambridge,<sup>2</sup> concerns about sanitation at shelters, a lack of transportation options to get to shelters, a lack of knowledge about shelter locations, needing to line up for a shelter space, lacking necessary identification, and needing to leave the shelter during the day.

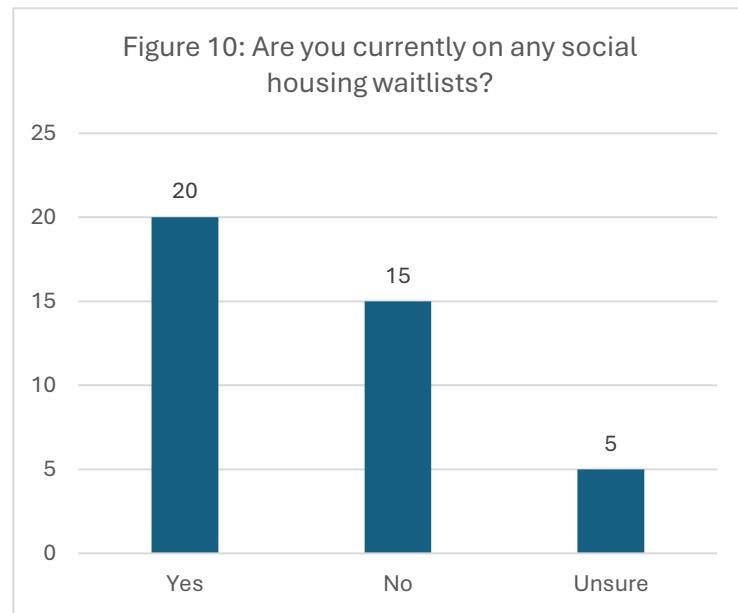
## Barriers to Permanent Housing

We also asked respondents questions related to their ability to access adequate, permanent housing, especially social housing. Given the high rates of market rent in Waterloo Region, particularly in relation to social assistance rates, for most individuals staying in encampments, accessing market rent housing is impossible. According to the Canada Mortgage and Housing Corporation (CMHC) in Oct 2024, the median market rent for a 1-bedroom apartment was \$1,472, and this may underestimate the rental costs of a new tenancy given that the median includes longstanding tenants paying below-market rent. In contrast, the maximum assistance available for a single person in receipt of Ontario Works (OW) in Oct 2024 was \$733, and this amount was \$1,368 for a single adult in receipt of the Ontario Disability Support Program (ODSP). The disconnect between income

<sup>2</sup> In December, 2024 the YWCA opened a dedicated women’s shelter in Cambridge on a temporary basis. Prior to this time, there was no dedicated women’s shelter in Cambridge. Respondents may be referring to experiences prior to Dec. 2024, or to ongoing difficulty accessing spaces (ex. all shelter beds are full).

support rates and market housing costs leaves social housing, that is housing offered at Rent-Geared-to-Income (RGI) rates, as the main permanent housing option for people experiencing homelessness.

We asked if survey respondents were on the waitlist for social housing in Waterloo Region. Just over half of the individuals (n=20) stated 'yes', with a further 15 individuals stating 'no', and 5 individuals indicating that they were 'unsure' (Figure 10). Twelve respondents indicated that they had not been able to satisfactorily connect with housing services, including several individuals who reported being on the housing waitlist.



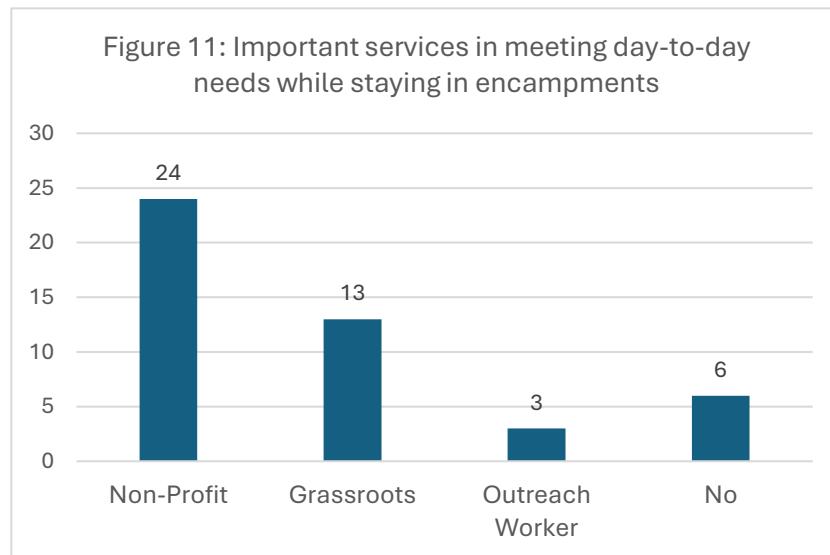
Some of the frustrations expressed in terms of accessing housing included no housing available, despite being on the housing waitlist for years, not being able to access housing despite being given priority on the waitlist, not feeling that housing workers were effective, and difficulty connecting with housing workers or services. In the follow-up qualitative responses, respondents described additional barriers to housing. Seven respondents noted they had been on the waitlist for more than 12 months. Reflecting the complexity of the waitlist process and status, five individuals left comments expressing uncertainty as to whether they were in fact on the housing list, including some individuals who had answered the previous question affirmatively. Five comments referenced administrative barriers to social housing, which ranged from arrears from previous time in social housing, to permanent residency status, to bans from the entire social housing system.

We also asked if individuals had been offered a permanent housing option, for example, a supportive living space, a room in a house, or an apartment. Of the 35 individuals who answered this question, most individuals (n=30, 86%) stated that they were not offered a permanent housing option, though one individual described finding market housing on their own. Of the five individuals who indicated that they had at some point been offered a permanent housing option, one was in the process of moving into housing, two described living for a time in housing arrangements they felt "forced" into, and that they described as

unsafe or unsuitable. The other three respondents described the housing offers as “falling through” prior to occupancy.

## Access to Services to Meet Day-to-Day Needs

To find out about service access, we asked respondents with experience living in encampments which types of service providers had been important in meeting their day-to-day needs. This was an open-ended question, and we coded responses into three emergent categories: non-profits (formal service providing organizations), grassroots initiatives (mutual aid, volunteers), and outreach workers (municipal and other types). Non-profits and grassroots were the most common ways individuals accessed services to meet their day-to-day needs, with a few individuals mentioning outreach workers (n=3) (Figure 11).



In comments from respondents, the most common organizations identified as helpful to meeting their day-to-day needs were Tiny Home Take Out, 519 Community Collective, 150 Main Drop-In, St. John’s Kitchen, Ray of Hope, the Sanguen Health Van, and the Working Centre’s Specialized Outreach Services (SOS). Importantly, many of the frequently mentioned organizations provide delivery and/or mobile services (ex. Sanguen Health Van, 519 Community Collective) or are located very close to where people accessing the service are camping (St. John’s Kitchen). Several individuals noted the importance of volunteer efforts in providing food and water to people staying in camps. One respondent described a non-profit as helping with tents, sleeping bags, and cell phones for their housing search. The types of organizations mentioned by individuals were consistent across encampments, but individuals at the 100 Victoria Street encampment were more likely to describe volunteers and organizations providing regular access to food. As one person put it, “you’re not going to starve if you stay here.”

One question on our survey asked if individuals knew of any attempts to offer Indigenous-specific services to people staying in encampments, to offer access to traditional medicine, and/or to discuss treaty rights when accessing encampments. We asked these

questions because international and domestic guidance on the Right to Housing emphasizes the importance of respecting Indigenous rights as part of meeting Right to Housing obligations.

Overall, 38 individuals responded to our question, of which 31 individuals responded “No”. A further two individuals were unsure. Of the remaining five individuals, four described accessing Indigenous specific services, and one described accessing traditional medicine, mostly informally through community, though two Indigenous outreach organizations, Seven Generations and Native Housing, were also mentioned.

## Key Takeaways

The Realizing the Right Encampment Survey provides a snapshot of the experiences of people staying in encampments in the Region.

- Most people have stayed in encampments for more than six months, with some individuals indicating they have lived in encampments for several years;
- People staying in encampments experience forced displacement and people staying at encampments that have legal or policy protections, such as the 100 Victoria Street encampment, are much less likely to be displaced;
- Forced displacement of encampment residents is strongly associated with harms that make it more difficult for encampment residents to access social networks, services, and supports needed for daily survival;
- People staying in encampments in Waterloo Region experience multiple, complex, and overlapping barriers to emergency shelter access, relating both to the availability and accessibility of emergency shelter spaces;
- There are significant barriers to accessing permanent housing for people staying in encampments, including insufficient income to access private market housing, long waitlists for social housing, difficulty connecting with housing workers, and complex administrative rules governing social housing processes;
- People staying in encampments rely primarily on non-profit service providers and grassroots volunteer and mutual aid efforts to meet their day-to-day needs;
- Few people staying in encampments reported accessing Indigenous-specific services or support

## Limitations

There are several limitations to our survey data. First, we used convenience sampling, and as such, our survey respondents may not be fully representative of people who have stayed in encampments in Waterloo Region. Second, we were only able to speak to individuals who were interested in completing a survey and who were comfortable participating in English. Because participation in our survey required a certain level of sustained focus, the voices of those in acute crisis may be underrepresented in this data. These limitations speak to the importance of ongoing efforts to document and include the perspective of people with experience staying in encampments in municipal policy responses.

THIS IS **EXHIBIT “G”** REFERRED TO  
IN THE AFFIDAVIT OF LAURA PIN  
SWORN REMOTELY AT THE CITY  
OF HAMILTON BEFORE ME AT THE  
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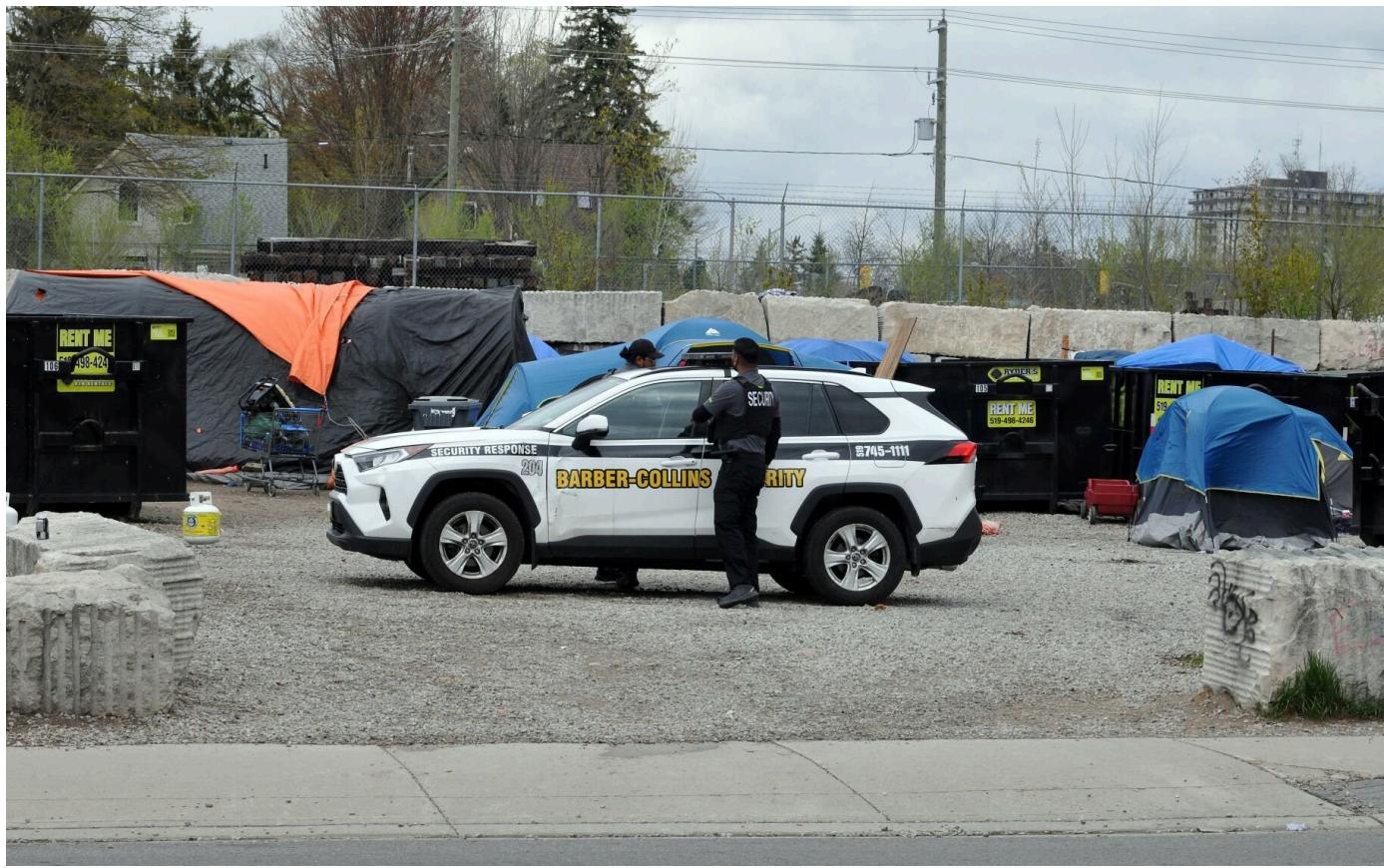
[https://www.therecord.com/opinion/contributors/don-t-block-the-help-restoring-access-and-dignity-to-kitchener-encampment-residents/article\\_6313f1cc-9d37-5a6e-a072-5eebef2c2c93.html](https://www.therecord.com/opinion/contributors/don-t-block-the-help-restoring-access-and-dignity-to-kitchener-encampment-residents/article_6313f1cc-9d37-5a6e-a072-5eebef2c2c93.html)

## CONTRIBUTORS

# Opinion | Don't block the help: Restoring access and dignity to Kitchener encampment residents

Dignity, safety and care for people living at Victoria and Weber streets should not depend on a policy loophole. They must be the foundation of how we respond to encampment communities — starting now, advocates write.

Updated 1 hr ago | June 10, 2025   



Security guards stand last month with their vehicle parked near an entrance to the encampment at Victoria and Weber streets in Kitchener.

Brent Davis/Waterloo Region Record file photo

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By **Erin Dej, Lori Lafond and Jacara Droog**

Over the last few weeks, the status of the 100 Victoria St. encampment in Kitchener has been the subject of regional council deliberation, the newly passed PDL-LEG-25-017 bylaw, and a reshaping of supports at the site.

The purpose of the bylaw, passed by the region on April 23, is to slowly shut down the encampment in advance of the Dec. 1 deadline for the space to be used to hold construction vehicles as Metrolinx gets ready to build its transit hub down the street.

The bylaw contains some positive elements, such as limited funds for rent supplements and significantly more money flagged for temporary motels that will expire by the end of next year.

However, the bylaw also contains multiple harmful elements, such as restricting the use of space between now and December and fining encampment residents and community members who come on site to support them up to \$5,000 after December.

This bylaw and its rollout was designed without input from the Co-Creators table as part of the Plan to End Chronic Homelessness, wherein more than 60 representatives from service providers across the region and people who have experienced homelessness are supposed to inform the region's response to the homelessness crisis.

Most importantly, it was done without consultation with encampment residents themselves; a gesture of disrespect similar to that of the historical and ongoing displacement of Indigenous folks on their own land.

The legality of this bylaw is questionable as the encampment was the site of the 2023 court ruling that found that without adequate shelter space, encampment evictions violate residents' Charter rights because they have nowhere else to go.

With recent data showing that the homeless population in the region has doubled in the last three years to more than 2,000 people, the situation has gotten worse.

While this legal question hangs in the air, and while the province is looking to double down on punishing people for being homeless, the region has been quick to enact the bylaw.

This looks like a trailer on site for residents to meet with a housing worker, but it also means shrinking the space where tents are allowed, blocking off the site so that no new residents can pitch a tent, and creating more blockades around the space.

These recent developments are alarming. In the last month, access to the encampment has been confusing at best and obstructive at worst. Mutual aid providers and service organizations have received mixed messages about whether

they can drive up to deliver supplies. Mutual aid supporters have seen a noticeable drop in food, clothing, and supply donations since the introduction of the bylaw. This is more than a bureaucratic oversight. It's a systemic failure, rooted in a colonial mindset, that limits life-saving interventions and stands in the way of an organized community wraparound response to a crisis impacting our neighbours.

Encampment residents rely on these kinds of resources to survive and they are deserving of all that it takes to move them from that place of survival to "living the good life."

While the bylaw claims to be "human-centred and relational," the outcome is the opposite: it creates dangerous barriers for people already struggling to meet their physical, emotional, mental and spiritual needs.

These barriers are reinforced by the way local media often echoes institutional narratives, rather than centring the lived experiences and rights of encampment residents.

One recent article, for example, focused on service disruptions while omitting critical context, including that notices lacked a date and time, and that the region attempted to place dumpsters near a resident's tent despite clear public health and safety concerns, such as the risk of rodents or dumpster fires. This kind of framing devalues the lives of people living in poverty, seeing them as unworthy of dignity and support.

The encampment at 100 Victoria St. is expected to remain in place until at least Dec. 1. That's six months from now. Restricting support services during that time not only undermines the region's Plan to End Chronic Homelessness — it disregards the humanity of the very people it's supposed to serve. All our relations matter.

Mutual aid is not an optional extra. It is a lifeline. Whether it's food, water, or basic hygiene products, such as toilet paper and hand wipes, these efforts are often the first and fastest form of care available. Deterring access doesn't just inconvenience volunteers; it risks lives.

It's time for regional leaders to make right the wrongs. Move the security vehicle back to where it has been stationed for years in the adjacent parking lot. Reaffirm that service providers and community members can access the site safely and consistently to provide support.

Dignity, safety, and care should not depend on a policy loophole. They must be the foundation of how we respond to encampment communities — starting now.

*Erin Dej is a member of the Unsheltered Campaign, a group of housed and unhoused community members who advocate for year round support, housing, and alternatives to shelters for all unhoused people in Waterloo Region.*

*Lori Lafond is part of A Womb With A View — Finding Common Ground, a peer led, social prescription for wellness and an emerging grassroots crisis response alternative that is rooted in Indigenous ways of knowing and doing, with a leaning toward 2 Eyed Seeing for future.*

*Jacara Droog is a social worker, housing advocate, member of the Unsheltered Campaign, and writing in solidarity with residents at the 100 Victoria encampment.*  
Opinion articles are based on the author's interpretations and judgments of facts, data and events. More details

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[REPORT AN ERROR](#)[JOURNALISTIC STANDARDS](#)[ABOUT THE RECORD](#)

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**TAB 31**

**ONTARIO  
SUPERIOR COURT OF JUSTICE**

B E T W E E N:

THE REGIONAL MUNICIPALITY OF WATERLOO

Applicant

and

PERSONS UNKNOWN AND TO BE ASCERTAINED

Respondents

APPLICATION UNDER Rule 14.05 of the *Rules of Civil Procedure*

**AFFIDAVIT OF MARGARET CHEE**

I, Margaret Chee, of the City of Mississauga, 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 community volunteer. I have been dropping off donations at the encampment at 100 Victoria St. N, Kitchener for approximately one year. I have dropped off donations approximately ten times.

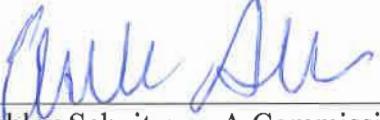
3. Items that I drop off include: tents, warm clothing, winter jackets, sweaters, pants, undergarments, winter boots, shoes, hats, gloves, scarves, hand warmers, soup, packaged snacks, coffee and Tim Hortons gift cards.
4. After hearing that the Region of Waterloo passed a new By-Law about the encampment, I feel that I cannot drop off donations any more. I feel that there are too many barriers and do not want to have conflict with security.
5. I am from out of town and am unfamiliar with the Kitchener-Waterloo area, and am hesitant to go to the encampment now as I do not know where else to park my vehicle. I have always driven onto the site directly and worry I cannot do that anymore.
6. I feel that the encampment is no longer accessible.
7. I injured my leg in 2024, and have restrictions to my mobility. I would be unable to carry my donations into the encampment if I cannot park directly on the site.
8. I became familiar with many residents at the encampment, and many had requested certain items (i.e. undergarments, jackets, sleeping bags, boots, etc.). Many of these residents were women who required specific items.
9. As the residents do not have phones, meeting in person is the only way I can communicate with them.

10. I would like to continue dropping off donations at the encampment but will be unable to while security blocks vehicle access into the site.

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

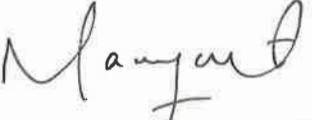
AFFIRMED remotely by Margaret Chee )  
at the City of Mississauga, in the Province )  
Of Ontario, before me at the City of Kitchener )  
in the Province of Ontario on May 13, 2024 in )  
accordance with O. Reg. 431/20. )

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Ashley Schuitema, A Commissioner of  
Oaths (LSO # 68257G)

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MARGARET CHEE

THE REGIONAL MUNICIPALITY OF  
WATERLOO  
Applicants

and

PERSONS UNKNOWN AND TO BE  
ASCERTAINED  
Respondents

Court File No.: CV-25-00000750-0000

**ONTARIO  
SUPERIOR COURT OF JUSTICE**

Proceeding commenced at KITCHENER

**AFFIDAVIT OF MARGARET CHEE**

WATERLOO REGION COMMUNITY LEGAL SERVICES  
450 Frederick Street, Unit 101  
Kitchener, Ontario N2H 2P5

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[ashley.schuitema@wrcls.clcj.ca](mailto:ashley.schuitema@wrcls.clcj.ca)  
Tel: 519-743-0254 x. 17  
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Joanna Mullen (LSO# 64535V)  
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Tel: 519-743-0254 x. 15  
Fax: 519-743-1588

Shannon K. Down (LSO# 43894D)  
[shannonkdown@gmail.com](mailto:shannonkdown@gmail.com)

Lawyers for the Respondents

# **TAB 32**

**ONTARIO  
SUPERIOR COURT OF JUSTICE**

B E T W E E N:

THE REGIONAL MUNICIPALITY OF WATERLOO

Applicant

and

PERSONS UNKNOWN AND TO BE ASCERTAINED

Respondents

APPLICATION UNDER Rule 14.05 of the *Rules of Civil Procedure*

**AFFIDAVIT OF SARA ESCOBAR**

I, Sara Escobar, of the City of Kitchener, 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 the co-founder of Peregrine Outreach Waterloo Region, a worker led initiative that supports outreach staff from social services organizations in Waterloo Region.
3. I have been working in the social services sector for over 20 years. My job positions have included front-line worker in the shelter system and street outreach worker for a variety of organizations including oneRoof, The Working Centre, and the House of Friendship.

4. I am extremely familiar with the issue of homelessness and the shelter system in Waterloo Region and the complexities of serving the street involved population. I am currently employed as a community development worker at a local shelter.

## **NUMBERS OF INDIVIDUALS EXPERIENCING HOMELESSNESS IN THE REGION**

5. A Point in Time (PiT) count was conducted in Waterloo Region on October 22, 2024. I participated in the PiT count in Cambridge with the aim of trying to capture women in Cambridge that are experiencing hidden homelessness. A total of 2,371 individuals were estimated to be experiencing homelessness in Waterloo Region on October 22, 2024. This number has more than doubled from the PiT Count conducted in September 2021, which found a total of 1,085 people were experiencing homelessness. Attached hereto and marked as **Exhibit “A”** is the **2024 Point in time Infographic** document which was produced by the Region of Waterloo.

## **SHELTER SYSTEM IN WATERLOO REGION**

6. In my experience, the shelter system has been very unstable in our region. Some shelters are temporary and close due to a lack of funding, issues in the neighbourhood or other problems. There are gaps in service that occur when an existing shelter closes and a replacement has not been found. Emergency shelters close frequently, they are temporary, and there is no guarantee they will remain open to continue to house people.

7. This has happened numerous times over the past few years with the most recent example being the shelter operated by the Working Centre at the former Schwaben Club site on King Street in Kitchener (the “King Street Shelter”). This shelter was co-ed and had beds for up to 100 people. At the end of March 2025 the King Street Shelter closed and there was not a replacement so outreach workers had to try to find places for the people using the shelter. Not everyone was placed in a shelter or housing. The shelter where I work in Cambridge was able to take 10 women leaving the King Street Shelter but I know some people at the King Street Shelter were not able to find an indoor place to go and some people ended up on the streets. Attached hereto and marked as **Exhibit “B”** is a print-out of the Record article dated March 31, 2025 titled “More desperation for homeless people as shelter, CTS site closes”.
8. At the end of April 2025, two temporary warming centres closed for the season resulting in a loss of 60 beds. This happened at the same time the Region implemented their Site-Specific Bylaw and began limiting any new residents from moving to the Victoria Street Encampment. Attached hereto and marked as **Exhibit “C”** is a print-out of the Record article dated May 15, 2025 titled “Cambridge warming centre ‘over capacity most nights’”.
9. The Cambridge Shelter Corporation also operates a healthcare facility out of the former Kinsman space. This space has 16 beds available for people that are considered medically fragile, but mobile. This space is at risk of closing and my understanding is that it is likely closing soon. I am not aware of any replacement for this space. Attached hereto and marked as **Exhibit “D”** is a print-out of the CTV News article published May 22, 2025 titled “Cambridge shelter’s healthcare facility needs a home”.

10. Front line workers have advised me that there is currently a hold on any new intakes into any of the Region's affordable housing waitlisted units (typically 10 years long waitlist) because any openings that come available are to be prioritized for residents from the Victoria Street Encampment. At the most recent Plan to End Chronic Homelessness meeting on May 15, 2025 I raised this issue and asked what the message should be to others in our community experiencing homelessness who are being bumped from their priority spot on this long waitlist because they are not living in this specific encampment.

11. In Waterloo Region there are only 67 emergency shelter beds for women and gender diverse people, 20 in Cambridge and 47 in Kitchener. The Cambridge shelter operates 24 hours a day, 7 days a week and it is always at capacity. In Kitchener the emergency shelter for women at 84 Frederick Street is overnight only and the women have to leave during the day. It is my understanding that there are a few beds available nightly at the 84 Fredrick Street shelter because the women in Kitchener find it too challenging to pack up each morning and carry around their belongings with them all day.

12. As far as I am aware there are no emergency shelter spaces for opposite sex couples. The only housing provider that could accommodate couples right now is University Ave, run by SHIP which is transitional housing, not emergency shelter. In order to be approved to stay at University Avenue in Waterloo, a couple would need to qualify through Regional housing and also through the SHIP intake process. SHIP as a service provider has many rules and policies related to substance use.

13. There are also people who have service restrictions at certain shelters and are banned from Regional buildings. This makes it very difficult for these people to access any services run by the Region.

14. We are experiencing high levels of people experiencing homelessness for the first time ever. These people will connect with outreach workers and ask where a safe place is to set up a tent. For newly homeless people it is essential that they be able to shelter themselves somewhere close to social services, as opposed to hiding away on the outskirts. As they are inexperienced in living rough, they need to be close to resources.

## **ENACMPMENT EVICTIONS IN WATERLOO REGION**

15. In the summer and fall of 2023 I supported many people that were experiencing encampment evictions in the City of Cambridge. In and around August 2023, a number of residents were evicted from an encampment at 150 Main Street. The Region of Waterloo owned this property and they put fencing around the property in 2022 to try to limit access to new residents. The Region slowly moved the fencing to decrease the amount of space the residents had access to until only a few residents remained.

16. I was doing outreach in Cambridge at the time and was at the encampment almost daily during this period. The residents complained to me about the fencing. Some indicated they felt corralled in or caged in. Some residents indicated that they felt the fencing removed a level of

privacy that was there previously. I personally observed people pulling into the lot to inquire and ask what the fencing was for. I observed people throw things through the fencing at the encampment residents. Although the Region claimed the fence was added to provide safety for the residents, in my observations the fencing did not add anything the security guards on site did not already provide.

17. In and around September 2023, I supported people living at an encampment in Soper Park in Cambridge during an eviction. More than 30 residents were evicted by the City of Cambridge. Many of these residents were people that had previously been living at the encampment at 150 Main Street.

18. There is an encampment eviction taking place in Cambridge today by the City of Cambridge. There are four couples plus one man being evicted, with the couples having no where to go.

19. When people are evicted from an encampment or are placed into temporary shelter or motels, they often lose their survival items like tents, tarps, cooking and warming tools, sleeping bags and clothing. These items are incredibly difficult to obtain for people experiencing homelessness and outreach workers are regularly asked if we can provide these items. We regularly have to make requests of community to donate these items so we can distribute them.

## **MOTELS**

20. In my experience motel spaces are typically provided to people experiencing homelessness that have a health issue, such as an infection or some sort of significant health concern. The idea is to let people stay in the motel for a period of time until they are medically stabilized. After a person is stabilized they may go to the emergency shelter or the street.

21. Motels are not a substitute for stable housing or supportive housing. Sometimes the funding runs out. Also people get kicked out frequently for a variety of reasons. The motel owners set the rules and decide when they want to kick someone out. People get kicked out for behaviour related to mental health disabilities including hoarding, damaging the rooms, allowing too many visitors, acts of violence, or substance related concerns.

22. The ability of outreach workers to support people at motels is limited. Outreach workers are already overburdened and people at motels frequently require regular support including food and medication deliveries, check ins for mental health crises and other support. There is not enough outreach capacity to meet the needs of people staying in motels.

23. There are risks for people at motels. Sex trafficking, drugs and violence are known risks for people staying at motels. In my experience some of the owners and staff at the motels are not safe for vulnerable individuals to be around, including women, gender diverse individuals, youths and seniors.

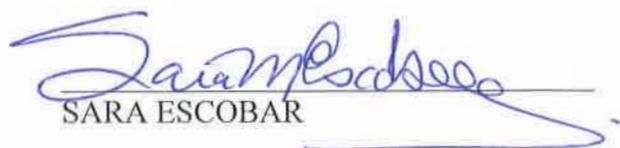
24. The motel itself also reserves the right to deny access to certain people. On a couple of occasions I brought someone to a motel and the motel staff requested that I bring the person to the front desk first so they can assess whether this is a person that is banned from their space, or someone that has a service restriction at that particular motel. When someone is evicted from a motel they return to an emergency shelter if there is space or to the street.

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

AFFIRMED BEFORE ME in the )  
City of Kitchener, this 23 day of )  
June, 2025 )  
In the Regional Municipality of Waterloo



**ASHLEY SCHUITEMA,**  
a Commissioner, etc.,  
Province of Ontario,  
while a Barrister and Solicitor,  
LSO #68257G

  
SARA ESCOBAR

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SWORN BEFORE ME AT THE  
CITY OF KITCHENER  
THIS 23<sup>TH</sup> DAY OF JUNE, 2025



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

# 2024 Point in time count findings



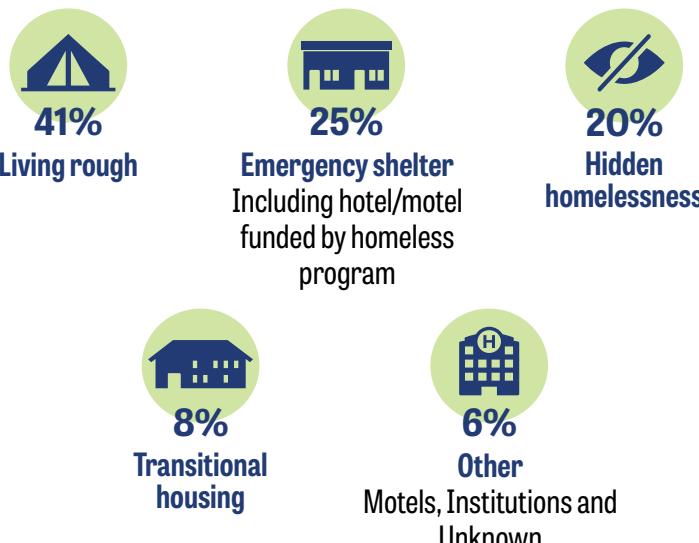
**2371** people experiencing any type of homelessness were counted on October 22, 2024.

- 1009** people living rough (living in encampments, on the street, or staying in their vehicle)
- 446** people staying in an emergency shelter
- 353** people experiencing hidden homelessness (staying with friends or family, or temporary accommodations)
- 221** people staying in transitional housing
- 153** people staying in a motel funded by the Region
- 100** people in institutions (hospital, police custody)
- 89** people staying in unknown or undisclosed locations

**1790** people included in the **point in time count** filled out a survey. A summary of the responses they shared is outlined below.

## WHERE/HOW LONG

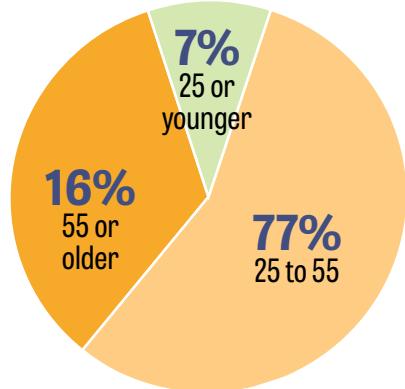
### Where people are experiencing homelessness\*



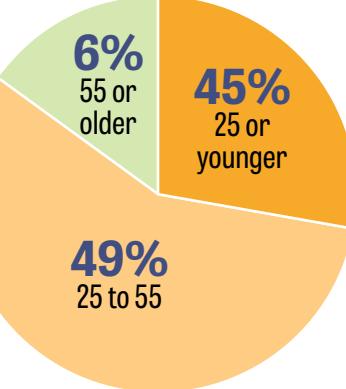
**78%** of people surveyed said they experienced chronic homelessness

## WHO

### Age of survey respondents



### Age when people first experienced homelessness



### Racial identity

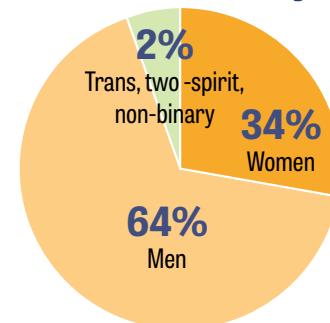
**26%**

Identified themselves as members of a racialized community

**17%**

Identified themselves as First Nations, Inuit, or Métis

### Gender identity



\* The number of people experiencing homelessness in these locations differs from the numbers reported at the top of the page as this section reports on where survey respondents are experiencing homelessness - not everyone experiencing homelessness filled out a survey. Not everyone who participated in the survey answered every question. The percentages above are based on total responses for each question.

# EXPERIENCES OF HOMELESSNESS

## Top 5 reasons

people said caused their experience of homelessness

Not enough income for housing **(44%)**

Conflict with spouse / partner **(18%)**

Landlord / tenant conflict **(13%)**

Unfit / unsafe housing conditions **(12%)**

Substance use issues **(11%)**



## Health challenges reported by survey respondents

**72%**  
Substance use

**70%**  
Mental health

**44%**  
Illness / medical condition

**29%**  
Physical limitation

**28%**  
Acquired brain injury

## Top 10 services that would be helpful

-  Finding affordable housing **(76%)**
-  Housing search support **(54%)**
-  Bus pass **(53%)**
-  Finding a job **(49%)**
-  Accessing income support (e.g. OW, EI) **(45%)**
-  Internet access **(42%)**
-  Getting ID **(41%)**
-  Outreach workers **(41%)**
-  Secure storage **(39%)**
-  Washrooms, showers **(39%)**



## Top 10 challenges to finding safe permanent housing

- Low income **(80%)**
- Rent too high **(78%)**
- Addiction **(33%)**
- No income assistance **(32%)**
- Poor housing conditions **(31%)**
- Mental health issues **(29%)**
- Discrimination **(27%)**
- Criminal history **(19%)**
- Family breakdown / conflict **(18%)**
- Physical health issues, accessibility **(16%)**

To learn more about Waterloo Region's Plan to End Chronic Homelessness, please visit:  
[engagewr.ca/end-chronic-homelessness](http://engagewr.ca/end-chronic-homelessness)

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[https://www.therecord.com/opinion/columnists/more-desperation-for-homeless-people-as-shelter-cts-site-closes/article\\_237ea210-8ef8-53df-b258-cb4141fa4dc6.html](https://www.therecord.com/opinion/columnists/more-desperation-for-homeless-people-as-shelter-cts-site-closes/article_237ea210-8ef8-53df-b258-cb4141fa4dc6.html)

COLUMNISTS

# Opinion | More desperation for homeless people as shelter, CTS site closes

A 100-bed shelter closes March 31. What happens to the homeless people who no longer have the ability to spend the night indoors, Luisa D'Amato asks.

March 31, 2025   



Dr. Maria Matsuda, left, talks to Glen Soikie outside the King Street shelter in Kitchener, Thursday.

Mathew McCarthy Waterloo Region Record

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By Luisa D'Amato Reporter

Luisa D'Amato is a Waterloo Region Record reporter and columnist. She writes on issues affecting day-to-day life in the area. She can be reached at [ldamato@therecord.com](mailto:ldamato@therecord.com).

Homeless people in this community have frozen to death overnight. Some have diseases like trench foot, a common illness in soldiers of the First World War when they couldn't keep their feet dry.

Some have lost fingers to frostbite. Some people on the street will light candles or a fire to stay warm, and sometimes they get burned. Or they might have a head injury or a wound from the violence that's everywhere in street life. They might get the flu or a virus, as we all do.

If you're living outside on the streets, those injuries and illnesses are harder to treat, and more likely to develop into something more serious, even fatal, said Dr. Maria Matsuda, a physician who treats homeless people at shelters, soup kitchens and encampments.

"The streets are not safe," said Matsuda, who is part of a medical outreach team with the Waterloo Region Inner City Physicians' Group.

If people living on the street could have a shelter bed where there are staff to help, they could keep themselves warm and dry, and keep track of medical appointments.

The health problems they face mean there is a much lower life expectancy for unhoused people, compared to people with a roof over their heads, she said.

And so Matsuda is deeply concerned about the closure on March 31 of two places that homeless people have gone for help.

One is a Kitchener shelter, run by The Working Centre, which housed 100 homeless people at 1668 King St. E. in the former Schwaben Club.

The other is the drug consumption and treatment services site on Duke Street West, near Kitchener City Hall. It must close by order of the provincial government, which does not want to fund supervised drug consumption services anymore.

As for the shelter on King Street, the government of Waterloo Region planned for it to stop operating Monday. Staff are trying to find other homes for the people who are there.

But the loss of those 100 shelter spaces, and of the drug consumption site, which offered much more than just supervision of drug-taking, is a tragic step backwards.

"It's a place to belong, a community that extends kindness and compassion," Matsuda said of the consumption site. "It's a safe place where people can go."

In 2024, Kitchener's site recorded 15,050 client visits and managed 79 overdoses on-site. Since opening in 2019, the site has overseen more than 1,000 overdose interventions with zero fatalities.

It wasn't just about taking drugs in safety. You could also sit down on a couch after many hours of being told to move along. You could get a drink of water or a snack. You could make a phone call, soak your feet, and dry your shoes.

The consumption site [will be replaced](#) by a Homelessness Addictions Recovery Treatment (HART) Hub, which will open April 1. Some services there will be delayed because funding from the province has been delayed.

Another support centre will open, run by Sanguen Health Centre.

As for the shelter spaces, Ryan Pettipiere, director of housing for the Region of Waterloo, said the region has purchased the building at 84 Frederick St., and it is now a shelter with 47 beds.

But that's not really an addition, because the Kitchener-Waterloo YW used to operate that building as a shelter, with room for 66 people. The agency sold the building last year.

There's a new shelter in Cambridge with room for 20 women that opened this past winter. And there were also winter "warming centres" in Cambridge and Kitchener that took a total of 50 people. They'll close in April.

But beyond that, "at this point we don't have additional plans to open additional shelters," Pettipiere said.

He's aware, as everyone operating emergency shelters is, that the number of homeless people is growing, and their needs are becoming more complex.

It's a problem that the Region of Waterloo, as a municipality, can't manage anymore by itself, with limited property tax dollars.

Instead, it is trying to focus on offering rent supplements and helping to build permanent affordable housing. If someone in a shelter is ready to move into permanent housing and live on their own, that would free up a bed for someone living on the street.

"We know the problem continues to grow," Pettipiere said. "We're doing what we can with the resources we have."

Those who work with unsheltered people agree that more shelters are badly needed. They're a port in a storm, a place to stabilize and recover, between the brutally violent life on the street and living in an apartment.

But it's getting harder and harder to find a place on which to build a shelter, even a temporary one, says John Neufeld, CEO of the House of Friendship, which has operated shelters and supportive housing for decades.

"Wherever you go, you get the door slammed shut on you," he said. "Nobody wants a shelter near them ... It's so hard to find a location."

Temporary shelters are hard on residents and staff, because of the uncertainty. "You're working with what you have, not what you need."

By contrast, permanent shelters with health supports "have demonstrated very strong outcomes and better health for those experiencing homelessness," he said.

Fifteen years ago, there were plenty of spaces in local shelters, he said.

But a number of factors has changed a lot of things. Key among them is the high levels of drug addiction on the streets.

Synthetic drugs like fentanyl are cheap and easily available. They're also deeply damaging and it's almost impossible to get free from addiction to them.

"We're putting toxins in our bodies that shouldn't be there," Neufeld said. "They're creating permanent long-term brain damage.

"You see the human suffering and pain at a level you've never seen before," he said.

Still, Neufeld said, progress is being made.

Before the pandemic, there were about 250 shelter spaces across the region and now there are about double that number.

And new supportive and affordable housing spaces are coming soon as well: the Indwell renovation of St. Peter's Lutheran Church with 41 units, the House of Friendship building on Charles Street with 170 units, and 97 Victoria, with 44 units.

Yet even with all those spots, most expected to open next year, the number of homeless people may be growing faster than our ability to build.

Right now, we still don't have enough shelter spaces, and hundreds of people still live in terrible conditions in tent encampments, in their vehicles, or sleep right on the street.

At the King Street shelter, there are still about 15 people left who "are unable to find a spot that meets their needs," said shelter operator Stephanie Mancini of The Working Centre on Friday.

"We continue to work with them to bridge to prioritized spots in the shelter system," she said.

*Luisa D'Amato is a Waterloo Region Record columnist. Reach her by email at [ldamato@therecord.com](mailto:ldamato@therecord.com)*

Opinion articles are based on the author's interpretations and judgments of facts, data and events. More details

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WATERLOO REGION

# Cambridge warming centre ‘over capacity most nights’

When the program shifted to serving only men in late February, the attendance steadily increased, peaking in April.

Updated May 15, 2025 at 2:55 p.m.

May 15, 2025



Cameron Dearlove, executive director of Porchlight Counselling and Addiction Services, at the organization’s Cambridge office on Thursday, May 15.

Mathew McCarthy/Waterloo Region Record

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By Prabhnoor Kaur Reporter

Cambridge's warming centre was full most nights last winter, sometimes even going over capacity.

"In March and April, we had a capacity of 30 and we would consistently see 30 to 35 men a night," said Cameron Dearlove, executive director of Porchlight Counselling and Addiction Services. "So we would go over capacity most nights, by a few people."

The overnight warming centre operated throughout the winter at Wesley United Church in Cambridge, offering warmth, food and compassion to individuals experiencing homelessness.

Funded by the region and run by Porchlight, the centre initially served only women until the YWCA's women's shelter opened in late February.

It then transitioned to exclusively serving men, with attendance rising steadily before reaching its peak in April.

"I think it was partly because the weather was not that nice, actually. It was still rainy," Dearlove said.

Guests gave very positive feedback about the program.

"They (guests) just really appreciated everything that was being done. Being able to come in and find warmth and kindness and food and a safe place to sleep," he said, adding the program's end last month left some guest worried.

"We certainly heard from the guests that there was a lot of anxiety at the end of April because the program was closing and they were, of course, quite worried about what would happen next for them."

The strong turnout, Dearlove said, shows there are many people in Cambridge who want to come indoors, but there aren't enough low-barrier shelters — places where people can just show up without needing to register or meet requirements.

"This being a very low barrier way for people to come inside ... that low barrier type of support is something that the guests were drawn to and appreciated," he said.

He believes the community needs more of all types of housing, he said, "so that people can move through the system and get housed."

The program ran with three staff members each night. In total, six full-time overnight workers were hired, along with backup casual staff and two cleaners.

There were no major challenges, but Dearlove said the project took an emotional toll on staff.

“There’s like a concept of moral injury,” Dearlove said. “The staff want to be able to help people a whole lot more than they’re able to ... within the system, we don’t have the resources to help people the way that they might want to.”

Porchlight is hoping to run the overnight warming centre again next winter — and start earlier in the season on Nov. 1.

Wesley United Church supported the project by providing a space.

“As far as accessibility for people to get there — very good location,” Dearlove said. “I think we were lucky with our partners there.”

With the summer already bringing warmer temperatures, there are no confirmed plans yet for a cooling centre.

“It’s certainly something that I think a lot of people would like to see,” Dearlove said, adding extreme weather happens in both winter and summer and some people need shelter all year round.

“If there were to be a cooling centre, for example, then it would be up to government funding to make that a possibility.”

PK

*Prabhnoor Kaur is a Waterloo Region-based general assignment reporter for the Cambridge Times. Reach her at [newsroom@cambridgetimes.ca](mailto:newsroom@cambridgetimes.ca).*

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[Kitchener](#) | News

## Cambridge shelter's healthcare facility needs a home

By [Jeff Pickel](#)

Published: May 22, 2025 at 5:54PM EDT

### Cambridge shelter needs a new home

A shelter in Cambridge, focused on helping people heal and recover, is at risk of shutting down. CTV's Jeff Pickel reports.

02:56 / 02:56

A shelter in Cambridge, focused on helping people heal and recover, is at risk of shutting down. CTV's Jeff Pickel reports.

The Cambridge Shelter Corporation is at risk of losing a healthcare facility serving the Region of Waterloo's homeless population.

According to the Cambridge Shelter Corporation, the operators of The Bridges Shelter, during COVID-19 they were tasked with managing an isolation site for the unhoused population.

The facility is currently located at 650 Concession Road in the former Kinsmen Childcare Centre.

With the lease soon expiring, The Cambridge Shelter Corporation said they need help to keep the service in operation.

"This building we are currently in is owned by the Region of Waterloo," Wayne Paddick, CEO of The Cambridge Shelter Corporation, said. "Regional council has passed the motion - they are turning this into a new EMS hub for the Region, which is very much needed."

[In August of last year, regional councillors approved a plan to redevelop the property into a new paramedic station.](#) Construction could be finished by 2027 and would cost approximately \$12.6 million.

However, the decision leaves the healthcare facility facing an uncertain future, even though the region is still funding staffing and operations.

"Now we are in a position where, by the fall, we need to move this program elsewhere. It comes down to a funding issue," said Paddick, explaining the organization is still on the hook for the cost of rent.

Paddick said facilities like the one that had been running out of the former Kinsmen Childcare Centre can ultimately save the region money by reducing healthcare costs. He said without those services, people in the shelter system can end up back at the hospital when they can't find a suitable place to recover.

"By having this, it alleviates some of the financial strain on emergency services," Paddick said.

Paddick points to data provided by homelesshub.ca that said the average cost of a hospital admission for a person who is homeless is \$2,559. The cost of a night at the Kinsmen Centre is \$130.

"I hate to use the term savings, but it's a huge benefit to have a facility like this in our community because it frees up emergency department space," Paddick said.

[The Cambridge Shelter Corporation is asking for donations from the community](#), and looking for larger corporate donation opportunities.

"If there are any organizations or companies that want to, for example, throw their name on the program, we're selling the rights to that," said Paddick.

#### Related Stories

- › [New details released about who is experiencing homelessness in Waterloo Region](#)
- › [Pushback over provincial bill cracking down on encampments, public drug use](#)

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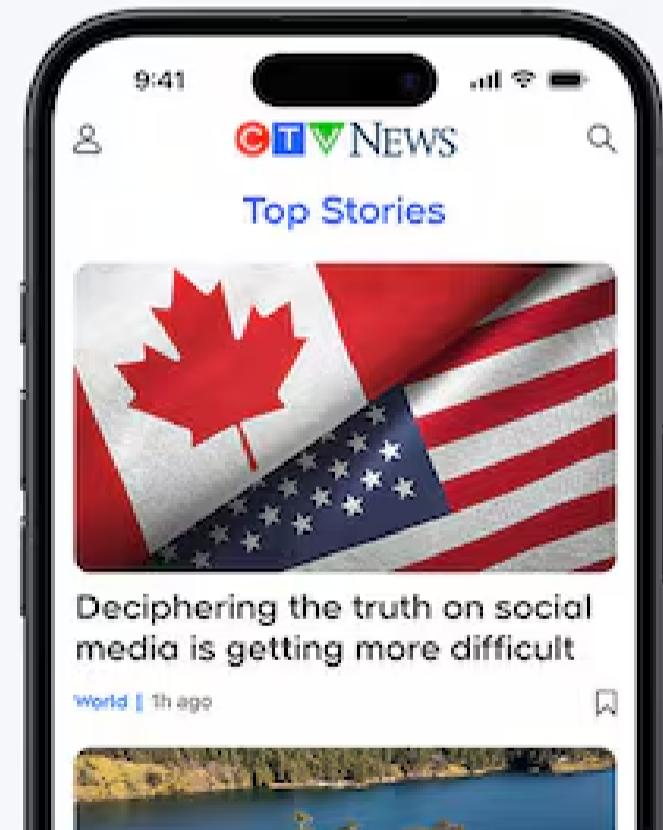
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THE REGIONAL MUNICIPALITY OF  
WATERLOO  
Applicants

and

PERSONS UNKNOWN AND TO BE  
ASCERTAINED  
Respondents

Court File No.: CV-25-00000750-0000

**ONTARIO  
SUPERIOR COURT OF JUSTICE**

Proceeding commenced at KITCHENER

**AFFIDAVIT OF SARA ESCOBAR**

WATERLOO REGION COMMUNITY LEGAL SERVICES  
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Lawyers for the Respondents

**TAB 33**

**ONTARIO  
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B E T W E E N:

THE REGIONAL MUNICIPALITY OF WATERLOO

Applicant

and

PERSONS UNKNOWN AND TO BE ASCERTAINED

Respondents

APPLICATION UNDER Rule 14.05 of the *Rules of Civil Procedure*

**2<sup>ND</sup> AFFIDAVIT OF SARA ESCOBAR**

I, Sara Escobar, of the City of Kitchener, 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 previously affirmed an affidavit dated June 23, 2025. I adopt and rely upon that Affidavit and update certain matters below. I affirm this affidavit as part of the Named Respondents Reply Motion Record in a motion for an injunction restraining the Region from enforcing the Site-Specific By-law.

## **Growth of Encampment**

3. I am not a member of Fight Back KW and never have been. However as a local grass roots group they play a valuable role in our community as lived experts. To minimize the work they are doing and the connections they have to the encampment community is unfair.
  
4. I am aware of the suggestion made by Peter Sweeney in the 2<sup>nd</sup> Affidavit of Peter Sweeney, affirmed July 2, 2025, that the Encampment has grown in size “as a result” of Fight Back and/or other “activists” encouraging unhoused individuals to set up tents there (para 9 and 90). This is suggesting that there is something unusual or improper about the continual influx and growth of residents at the Encampment. Despite expanding the shelter capacity slightly, there are still not enough shelter, motel, transitional, supportive beds or rental subsidies combined in the Region to meet the needs of the entire unsheltered population which has more than doubled since 2021. By necessity some of the Region’s 2,300 homeless population will live in tents. The Region knows this.
  
5. The Region acknowledges there is not enough shelter space for everyone that needs it by funding the distribution of tents and other survival gear as part of their winter warming strategy. I sat on a Winter Warming Committee preparing for the winter for 2024-2025 facilitated by staff within the Community Services Department of the Region. For approximately three years, as part of the Region’s winter warming strategy, they fund community partners to distribute winter warming packages to people experiencing unsheltered homelessness that include sleeping bags, tents and tarps. I attach as **Exhibit “A”** a copy of the Region’s Press Release

posted on December 14, 2022, titled “Region to Provide Winter Warming Packages”. The Region is aware that many of the social service agencies that they fund will supply unsheltered people in the Region with tents. See as **Exhibit “B”** an email from Krystina Damyanovich, Social Planning Associate, Housing Services to the Winter Warming Committee dated November 28, 2024 confirming the base items in the Winter Warming Supplies provided by the Working Centre include: boots, hats, gloves, hand warmers, socks, long johns, arctic lanterns and candles, sleeping bags, tents and tarps. I confirm that winter warming packages were made available this past winter for 2024-2025, including tents and were distributed across Waterloo Region.

6. Further, community partners retain Winter Warming Supplies they received and continue to give out tents to those living unsheltered in our community throughout the year because the need doesn’t stop.

### **Building Trust**

7. As someone who has worked with and supported the unsheltered population for more than two decades I am confused by the approach taken by the Region to engage with the residents at the Encampment. Although Peter Sweeney is comparing this to the approach taken when a shelter closes, it is very different. A shelter is staffed to support the needs of people using that space, people have food, running water, a bed to sleep in, air conditioning, and access to staff. This is not the case for people living at an encampment. It is inappropriate to compare the two spaces and inappropriate to use the same strategy when attempting to close down the encampment.

8. Developing trust of those living unsheltered is more challenging and harder than working with those staying in an emergency shelter. As a front line worker, I understand that folks that have been pushed to live at the Encampment can be harder to reach and less trusting of people coming around. Often people that live in encampments are marginalized and tend to have limited access to other spaces because of mental health disabilities, service restrictions and/or substance use. It takes a lot of work to get to know people and people are more hesitant to engage and trust outreach workers.
  
9. I am not aware of the exact date when the Region unhoused support workers (“USWs”) began to provide direct service to the Encampment related to housing but in order to build the relationships needed it should have been happening as soon as the previous decision was released, and I know it was not done at that time. In my experience as an outreach worker, in order to be successful an outreach worker must be able to dedicate a significant amount of time to a client and support them in attending appointments like housing, medical, legal, etc. to serve to stabilize the person and build rapport. In my experience the USWs are unable to do this because they are limited in the amount of time they are able to spend with Encampment residents.
  
10. The way in which the Region went about dropping off the dumpsters and site trailer on April 16, 2025 was harmful. There was no warning given to any community partners, including the residents. Front line workers in the community have advised me that residents were woken up to noises of heavy machinery, and many have trauma related to other encampment clearings

which caused anxiety and stress. Given the role of the Plan to End Chronic Homelessness Co-Creators group, if the Region suspected that something they are doing may have a negative impact on a community group they ought to attempt to minimize that impact or harm. The Region did nothing to attempt to minimize that harm. That will impact the USWs ability to build trust.

11. Additionally, telling residents they have to leave the property by a certain date does not build trust, it is an ultimatum. I recently became aware of the Federal Housing Advocate's new report on Meaningful Engagement with Encampment Residents, which I attach it here as **Exhibit C**. In my experience as an outreach worker, the residents deserve autonomy and meaningful choice when engaging in discussions about what truly meet their needs. The approach taken by the Region to require the Encampment to close by December 1, does not allow the USWs to meaningfully engage with the residents about their choices or options.

### **Housing First Approach**

12. Not everyone at the Encampment requires a “staged” approach to housing. Not everyone will require a period of stabilization before moving on to their own housing. People need to be given autonomy to make these decisions, and it does not sound like the Region’s plan provides for that. Also the emergency shelter system does not necessarily stabilize people. For example, emergency shelters that require people to leave every morning and return every evening do not offer the stability required to truly stabilize someone. Emergency shelter can be destabilizing and triggering for some, as can motels.

13. On average people may stay in an emergency shelter for six months to one year or longer, as there are very limited resources to move people into. The waiting lists for transitional and supportive and affordable housing are between 10-15 years long. People that do not live at the Encampment but are waiting in shelter, or are otherwise experiencing homelessness other than the Encampment, will be bumped further down this wait list and have to wait even longer if residents from the Encampment are prioritized for space.

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

AFFIRMED remotely by Sara Escobar )  
at the City of Kitchener, in the Province )  
of Ontario, before me at the City of Kitchener )  
in the Province of Ontario on July 7, 2025 in )  
accordance with O. Reg. 431/20. )

  
\_\_\_\_\_  
Ashley Schuitema, A Commissioner of  
Oaths (LSO # 68257G)

  
\_\_\_\_\_  
SARA ESCOBAR

THIS IS **EXHIBIT “A”** REFERRED TO IN  
THE 2nd AFFIDAVIT OF SARA  
ESCOBAR SWORN BEFORE ME AT THE  
CITY OF KITCHENER  
THIS 7<sup>TH</sup> DAY OF JULY, 2025



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



Region of Waterloo

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# Region to Provide Winter Warming Packages

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Posted on Wednesday December 14, 2022

[Subscribe](#)

**Waterloo Region** – With colder temperatures approaching, the Region of Waterloo is partnering with The Working Centre to provide Winter Warming Packages for people experiencing unsheltered homelessness.

“Our first priority is always to connect individuals to safer indoor shelter spaces and support services,” said Councillor Jim Erb, Chair of the Community and Health Services Committee, Region of Waterloo. “Extreme winter weather conditions pose serious risks for those experiencing unsheltered homelessness. The Winter Warming Packages will provide cold weather supplies and a connection to support services as we continue work to transition people into housing.”

The Working Centre and other community partners are working hard to sign people up and order the supplies as quickly as possible. The limited number of packages will include winter clothing, a warm sleeping bag, an insulated sleeping pad, and other outdoor winter supplies. Packages will be given to individuals staying in encampments or living rough in Kitchener, Waterloo and Cambridge while supplies last.

“Responding to health and safety concerns, the Region hosted community partners exploring a plan to support people living outdoors during the winter months,” said Stephanie Mancini, co-founder of The Working Centre. “We have been working with Mountain Equipment Company, whose expertise is outdoor living to create the Winter Warming Packages. This is a combined effort to keep people as safe as possible, while we still work forwards on finding more indoor sheltering/housing options.”

The Region recognizes the support of Mountain Equipment Company, the City of Kitchener and the Cambridge Food Bank for this project.

The Region has an extreme weather protocol. It provides support to emergency shelters and drop-in programs to adjust services and expand hours of operation during periods of extreme cold, adhering to health and safety processes and protocols, and depending on the program staffing ability.

[Chat](#)

The Interim Housing Solutions strategy is working to end unsheltered homelessness across Waterloo Region.

[engagewr.ca/interim-housing-solutions](http://engagewr.ca/interim-housing-solutions)

Chat

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ASHLEY SCHUITEMA  
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LSO # 68257G

# **Winter Warming Package**

To help keep warmer while in encampments this winter, a package is being prepared.

## **Items available:**

**Artic Lantern**

**Artic Candles**

**Gloves**

**Toque**

**Tarps**

**Space Blankets**

**Bungee cords**

**Tuck Tape**

**Hand Warmers**

**Socks**

**Winter Boots**

**Long Johns**

Please circle which of the above items that would be useful for you.

Please fill out the below form for sizing and requests for items not listed.

<b>Your Name</b>				
<b>Encampment Location</b>				
<b>Contact Info</b>				
<b>Boot Size</b>	Women's Size		Men's Size	
<b>Glove Size</b>	Small	Medium	Large	X-Large
<b>Other Items requested</b>				
<b>Notes</b>				

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ASHLEY SCHUITEMA  
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While a Barrister and Solicitor.  
LSO # 68257G



FACTSHEETS



# Guide to Meaningful Engagement and Integrating a Human Rights- based Approach into Encampment Responses



Office of the  
Federal Housing  
Advocate

Bureau du  
défenseur fédéral  
du logement

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# Introduction to the Resource

*"A neighborhood that does not seek to meet the needs of all people, whether housed or not, is not a successful community. Too often, people living in encampments are seen as obstacles rather than as human beings" (Stakeholder).*

In February 2024, the Federal Housing Advocate released her report, [Upholding dignity and human rights](#), presenting her findings and recommendations following a systemic review of homeless encampments across Canada.<sup>1</sup> The report highlighted that governments have human rights obligations to people living in encampments and called for the adoption of a human rights-based approach.<sup>2</sup>

This resource has been developed to provide additional guidance to governments on how they should adopt a human rights-based approach when it comes to encampment responses. It is particularly relevant for municipal decision-makers and officials, who are most often on the frontlines when it comes to encampment responses. However, it can also be used as a tool for other levels of government, service providers and advocates. Recognizing that forced evictions of encampments are a violation of human rights and that they are inherently harmful, this guide encourages municipalities to explore alternatives rooted in a human rights-based approach and to value meaningful engagement of people living in encampments. The use of a human rights-based approach, which includes people living in encampments in the design and delivery of durable solutions, is a win-win for a community. This approach not only improves the quality of life and health of people living in encampments, but it also helps to find long-term solutions that address people's real needs.

The resource also attempts to respond to concerns expressed by people living in encampments and human rights advocates, who have noted that the language of human rights, reconciliation and consultation has been co-opted in some instances and even used to

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1. 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. The Advocate has chosen to use the term "homeless encampment" as the language most commonly in use for now. She 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. Some people refer to "tent cities" and others prefer terminology which speaks of "people living on the street".

2. A full list of recommendations for municipalities is available at this [link](#) and for provinces and territories at this [link](#).

justify processes that cause harm. The Federal Housing Advocate is concerned about some examples she has heard about where municipalities put consultation processes in place without a willingness to change their practices or after they had already determined what the outcome will be. One example that was shared, which does not demonstrate the spirit of reconciliation with First Nations peoples, was a municipality adding territorial acknowledgement to an eviction notice.

A human rights-based approach to encampments requires commitment to a paradigm shift and to doing things differently. It is not enough to claim to adopt and to be applying a human rights-based approach; it is essential to take actions that lead to rights being protected and a real improvement in the lives of people living in encampments. This must not be limited to efforts to ensure access to adequate housing but must also include immediate measures to respect human dignity and protect lives until such time as adequate long-term housing solutions are available in sufficient quantities and adapted to meet people's needs.

This resource articulates eight key principles that are necessary to guide municipal decision-makers and staff in ensuring meaningful engagement is carried out and to implement a human rights-based approach in their encampment responses. For each principle, there is a fact sheet that identifies actions needed to put the principle into practice. It is important to note that there is not one road map that can be applied systematically to all situations. Each community is unique and every person living in an encampment has their distinct experience and needs.

Readers are encouraged to reflect individually and collectively on their role in implementing these principles and to apply the principles and actions into concrete policies, protocols, plans and laws. Adopting a human rights-based approach begins with understanding the realities and perspectives of people living in encampments and that they are rights-holders and taking action to protect safety, dignity and human rights.

When a human rights-based approach to encampment is put in place, it will build trust, encourage participation and engagement as well as empower people to contribute to solutions that will provide appropriate, accessible and adequate long-term housing solutions and services as well as measures to address their immediate needs.

It is also important to recognize that all levels of government have a role to play. Municipalities do not always have the powers, capacity and resources to address the systemic nature of homelessness and encampments across Canada. This shared responsibility requires all levels of government to support municipalities, including funding, to develop appropriate housing solutions and adapted services. However, regardless of the budgets available, it is important to remember that the starting point remains the same – genuine engagement with people living in encampments to understand their individual and collective needs is essential for a human rights-based approach. They are in the best position to determine what actions will improve their living and health conditions, and therefore to assess whether a municipality is truly implementing a human rights-based approach.

The information contained in this resource is the fruit of pan-Canadian engagement with a range of stakeholders which has continued since the Advocate launched her review of homeless encampments in February 2023. This resource builds on the perspectives of people with lived experience in encampments, advocates and municipal officials who contributed to the Advocate's review and participated in follow up engagement activities that took place between October 2024 and March 2025.

It is strongly recommended that the reader take the time to review all the information in every fact sheet to gain a full understanding of how to implement a human rights-based response to encampments. The fact sheets are not designed as a series of steps to be followed in a precise order, but as a guide to encourage deeper reflection and action to advance human rights. Individual fact sheets can also be consulted if the reader is seeking guidance to address a specific principle or situation.

The Advocate will continue to monitor the implementation of her recommendations and looks forward to continuing her work with municipalities and others that are making genuine efforts to implement a human rights-based approach to encampments.

*This resource was produced to advance human rights for people experiencing homelessness and guide actions to improve the living conditions of people living in encampments. It is not a legal opinion and is not legal advice, but a guide to support a stronger commitment to meaningful engagement with people living in encampments and more effective action to put in practice a human rights-based approach in municipal encampment responses.*

# The Eight Principles to Guide Meaningful Engagement with People Living in Encampments

## 1 Understand and respect the realities of people living in encampments

Many people, including people responsible for municipal responses to encampments, make assumptions about the reality of people living in encampments without taking into account their voices, which means that the measures put in place may not adequately meet their needs. Homeless encampments exist because of the lack of adequate alternative housing options, colonialism, racism and systemic discrimination. People are choosing to live in encampments because, for most, a makeshift shelter in a public space is still often the best or only option available to them. Before proposing solutions, it is important to take time to learn about and understand their experiences and to consider that people choose to live in encampments because housing and emergency shelters are unavailable, inaccessible or do not provide the safety and security they need.

Durable solutions will only come about when the responses address the real issues and needs identified by the people living in encampments. This cannot be done without a commitment to meaningful engagement.

[Click here to go directly to the actions that will help put this principle into practice.](#)

## 2 Publicly recognize the human rights of people living in encampments

All governments in Canada, including municipalities, have legal obligations to respect, protect and fulfil human rights. People experiencing homelessness and living in encampments have the same human rights as everyone else in Canada.

In 2019, the *National Housing Strategy Act* reaffirmed Canada's commitment to housing as a fundamental human right and recommitted Canada to the progressive realization of the right to adequate housing as defined in the *International Covenant on Economic, Social and Cultural Rights*. The right to adequate housing is clearly defined in

international human rights law<sup>3</sup>, and interconnected rights such as the right to life<sup>4</sup> and freedom from discrimination, are part of Canada's *Charter of Rights and Freedoms*.

Explicit recognition that people living in encampments are entitled to the protection of their human rights is a critical first step to changing the conversation and moving away from enforcement approaches that have failed in the past and continue to cause harm. Forced evictions are a violation of international human rights law and inherently harmful. If a proposed action risks infringing on human rights, it must be reconsidered and an adequate alternative found that meets the needs of the people living in encampments.

Adopting a human rights-based approach to encampments aligns with Canada's human rights obligations. It provides an alternative to enforcement approaches which criminalize people for experiencing homelessness and cause further harm. It also provides a framework to understand and address the systemic nature of homelessness in Canada and design and implement long-term solutions to realize the human rights of people living in encampments.

A human rights-based approach to encampments is focused on finding sustainable solutions that will provide access to adequate housing. It ensures that all policies and plans to support people living in encampments are designed following meaningful engagement and implemented in compliance with international human rights standards. In the absence of concrete possibilities to be adequately rehoused, a human rights-based approach requires taking immediate actions to protect the human rights of people experiencing homelessness, including the right to life and making available services that meet their fundamental needs.

[Click here to go directly to the actions that will help put this principle into practice.](#)

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3. See the Committee on Economic, Social and Cultural Rights general comments [No. 4 \(1991\) on the right to adequate housing](#) and [No. 7 \(1997\) on forced evictions](#).

4. See the Committee on Civil and Political Rights' [general comment 36 on the right to life](#), Article 26 which states: "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 high levels of criminal and gun violence, pervasive traffic and industrial accidents, degradation of the environment, deprivation of indigenous peoples' land, territories and resources, the prevalence of life-threatening diseases, such as AIDS, tuberculosis and malaria, extensive substance abuse, widespread hunger and malnutrition and extreme poverty and homelessness."

### 3 **Recognize and uphold the rights of First Nations, Inuit and Métis Peoples living in encampments**

As a direct result of colonization and displacement, First Nations, Inuit and Métis people are acutely over-represented in Canada's population of people experiencing homelessness and living in encampments. Encampment responses must integrate the rights found in the *United Nations Declaration on the Right of Indigenous Peoples* (UNDRIP). Métis, Inuit, and First Nations governments must be supported in managing and implementing housing solutions that reflect self-governance and community-specific needs.

Urban Indigenous populations are over-represented in encampments and face distinct housing challenges, including inadequate access to culturally appropriate services as well as systemic barriers to affordable housing. It is critical to establish dedicated financial mechanisms to bridge jurisdictional gaps and provide sustainable housing solutions for Indigenous communities regardless of where they live.

[Click here to go directly to the actions that will help put this principle into practice.](#)

### 4 **Build and maintain the trust of people living in encampments**

Meaningful engagement with people living in encampments is an essential component of a human rights-based approach and a necessary step in finding sustainable housing solutions. It must be built upon relationships of trust that demonstrate transparency, accountability and integrity. All too often, people living in encampments have been asked for their opinions, but their ideas were not taken into consideration. Engagement processes that are sincere and focus on the real interest of people living in encampments help to establish and strengthen bonds of trust.

Meaningful engagement takes time and requires the investment of resources. To achieve this, it is essential to provide people living in encampments with the support they need to overcome obstacles to their participation in engagement processes and to ensure they see that their voice has a real impact.

When such engagement processes are implemented authentically with genuine intention to bring about positive change, it leads to concrete solutions that respect the rights of people living in encampments— instead of band-aid fixes that waste time

and taxpayer money, and further harm the people affected. Meaningful engagement with people living in encampments requires a proactive approach to involve them in finding solutions that can pre-empt community concerns.

If no individuals from encampments wishes or is able to participate meaningfully in an engagement process, it is crucial to examine the reasons for this. Was the process authentic? Was it implemented with integrity? Was every effort made to create truly accessible spaces and to ensure that the interests of people living in encampments were represented effectively? Did their perspectives inform decisions?

[Click here to go directly to the actions that will help put this principle into practice.](#)

## 5 **Provide services adapted to the needs and realities of people living in encampments**

People living in encampments do not have access to the same basic services as those who are living in adequate housing, particularly in terms of protections from the elements, access to potable water and waste collection for example. They face challenges accessing the care they need to protect their physical and mental health, including harm reduction supports to save the lives of people who use substances. Although in Canada the recording of mortality rates for people experiencing homelessness is inconsistent or even absent in several provinces, research demonstrates that the difficult living conditions experienced by people experiencing homelessness are clearly a risk factor for mortality.<sup>5</sup>

To save lives and uphold the dignity of people living in encampments, it is critical to also advance the right to health of people living in encampments, ensuring that the services are available to address their fundamental and complex mental and physical health needs of people.

[Click here to go directly to the actions that will help put this principle into practice.](#)

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5. Roncarati, J. S., Baggett, T. P., O'Connell, J. J., Hwang, S. W., Cook, E. F., Krieger, N., & Sorensen, G. (2018). Mortality among unsheltered homeless adults in Boston, Massachusetts, 2000–2009. *JAMA Internal Medicine*, 178(9), 1242. <https://doi.org/10.1001/jamainternmed.2018.2924> ; Roncarati, J. S., O'Connell, J. J., Hwang, S. W., Baggett, T. P., Cook, E. F., Krieger, N., & Sorensen, G. (2020). The use of high-risk criteria to assess mortality risk among unsheltered homeless persons. *Journal of Health Care for the Poor and Underserved*, 31(1), 441–454. <https://doi.org/10.1353/hpu.2020.0032>

## 6 **Facilitate participation in decision-making of people living in encampments**

Excluding people living in encampments from decision-making processes perpetuates their marginalization and undermines their right to autonomy. This kind of exclusion undermines trust and compromises efforts to build meaningful relationships.

It is important that engagement processes begin as early as possible and that they be ongoing to facilitate the participation of people living in encampments. They must be included in decision-making processes concerning policies, programs, practices and laws that affect them. Their perspective must be taken into account in the decisions that directly influence their own lives if we are to achieve real sustainable solutions.

[Click here to go directly to the actions that will help put this principle into practice.](#)

## 7 **Support the self-determination and autonomy of people living in encampments**

Encampment responses should be designed to uphold the dignity of people living in encampments as well as their autonomy to be part of decisions that affect their lives. Consultations are a mere formality when decisions have already been made, making it clear to encampment residents that their input is not important. It is critical to stop instrumentalizing people living in encampments solely to satisfy consultation requirements. It is important to remember that people living in encampments are able to think critically and have the ability to organize and make decisions about their own lives.

It is also important to put in place measures which help to empower and build the confidence of people living in encampments by, for example, supporting their shared responsibility for managing and maintaining their encampment. This can enhance a sense of belonging in the community, provide stability, and can be an important step in a person's journey to adequate housing.

[Click here to go directly to the actions that will help put this principle into practice.](#)

## 8 Continue to work towards long-term adequate housing solutions

Encampments are not a solution to the housing and homelessness crisis. Municipal efforts must continue to prioritize adequate housing that meets the international standard for security of tenure, availability of services, affordability, habitability, accessibility, location and cultural adequacy<sup>6</sup> at the same time as efforts are undertaken to protect the human rights of people living in encampments.

To adopt a human rights-based approach, it is essential for municipalities to quickly establish services that meet the immediate needs of people living in encampments and protect their lives and dignity. They must also continue to fully mobilize their own resources to facilitate access to adequate housing, along with the necessary and desired support services. It is important that municipalities continue their advocacy with other levels of government to secure funding to achieve these ends. People should not be forced or required to go to an emergency shelter before being considered for a permanent and adequate housing solution.

[Click here to go directly to the actions that will help put this principle into practice.](#)

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6. The Right to Adequate Housing, UN Habitat Fact Sheet 21, [https://www.ohchr.org/sites/default/files/Documents/Publications/FS21\\_rev\\_1\\_Housing\\_en.pdf](https://www.ohchr.org/sites/default/files/Documents/Publications/FS21_rev_1_Housing_en.pdf)

# Human Rights, Indigenous Rights and a Human Rights-Based Approach<sup>7</sup>

## The Human Rights of People Living in Encampments

According to the former Special Rapporteur on the Right to Adequate Housing, Leilani Farha:

*“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.”<sup>8</sup>*

With the 2019 *National Housing Strategy Act*, recognition of the right to adequate housing, as defined in international human rights law, is now also explicitly enshrined in domestic federal law.

The right to adequate housing is more than four walls and a roof. Adequate housing under international law<sup>9</sup> includes:

- **Security of tenure:** Housing is not adequate if its occupants do not have a degree of tenure security which guarantees legal protection against forced evictions, harassment and other threats.
- **Availability of services, materials, facilities and infrastructure:** Housing is not adequate if its occupants do not have safe drinking water, adequate sanitation, energy for cooking, heating, lighting, food storage and refuse disposal.

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7. For a more detailed description of human rights and legal obligations, see Flynn, A., Kiiwetinepinesiik Stark, H., Van Wagner, E., 2024, Encampments and legal obligations: Evolving rights and relationships. The Office of the Federal Housing Advocate.

8. 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].

9. The Right to Adequate Housing, UN Habitat Fact Sheet 21, [https://www.ohchr.org/sites/default/files/Documents/Publications/FS21\\_rev\\_1\\_Housing\\_en.pdf](https://www.ohchr.org/sites/default/files/Documents/Publications/FS21_rev_1_Housing_en.pdf)

- **Affordability:** Housing is not adequate if its cost threatens or compromises the occupants' enjoyment of other human rights.
- **Habitability:** Housing is not adequate if it does not guarantee physical safety and provide adequate space as well as protection against the cold, damp, heat, rain, wind, other threats to health and structural hazards.
- **Accessibility:** Housing is not adequate if the specific needs of disadvantaged and marginalized groups are not taken into account.
- **Location:** Housing is not adequate if it is cut off from employment opportunities, healthcare services, schools, childcare centres and other social facilities, or if it is located in polluted or dangerous areas.
- **Cultural adequacy:** Housing is not adequate if it does not respect and take into account the expression of cultural identity.

It is important for municipalities and municipal actors to recognize that forced evictions<sup>10</sup> of encampments make people more unsafe and expose them to a greater risk of violence and harm a person's safety, health, dignity and may even cost them their life. Evictions destabilize people, remove them from their support systems, and cause them to lose the tools and equipment they need to survive.

International human rights law also prohibits measures that would arbitrarily and unnecessarily deprive individuals of housing, including temporary or informal shelters such as encampments.<sup>11</sup> The prohibition of forced evictions requires that individuals and communities be relocated only after adequate consultation. People should not be displaced without somewhere to go. They should not be expected to move to a situation that results in worse conditions or diminished access to services. For example, if they have access to toilets in their current location, they should have similar access if another location is being

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10. To better understand the prohibition on forced evictions under international law, see Principle 3 in the [National Protocol for Homeless Encampments in Canada](#), Leilani Farha and Kaitlin Schwan, 2020.

11. The obligation of States to refrain from, and protect against, forced evictions from homes and land arises from several international legal instruments, including the Universal Declaration of Human Rights, the International Covenant on Economic, Social and Cultural Rights (art. 11, para. 1), the International Covenant on Civil and Political Rights (art. 17, 23 and 27) the Convention on the Rights of the Child (art. 27, para. 3), the non-discrimination provisions found in article 14, paragraph 2 (h), of the Convention on the Elimination of All Forms of Discrimination Against Women, and article 5 (e) of the International Convention on the Elimination of All Forms of Racial Discrimination. In its resolution 1993/77, the Commission on Human Rights stated that the "practice of forced eviction constitutes a gross violation of human rights, in particular of the right to adequate housing." <https://www.ohchr.org/en/special-procedures/sr-housing/forced-evictions>

proposed. A short-term offer of an emergency shelter bed is not enough to not meet the requirements of adequate housing.

Relocation without consent must be limited to exceptional circumstances. When individuals or communities do not consent to be relocated because the proposed alternatives do not meet their real needs, municipalities have an obligation to be transparent and demonstrate to the people living in the encampment, to their advocates and to the public that the relocation is genuinely necessary, that all options have been explored and that the actions being taken respect human rights principles. If it is determined that an eviction is justified, it should only take place with a clear, long-term plan for where people will go during both the night and daytime, a strategy for how they will move, and a plan for equivalent or improved shelter and services.

Furthermore, it is important to note that forced evictions include evictions by coercion. One thing commonly reported by unhoused people is being told that if they do not accept a certain shelter or other housing option they believe is unsafe or unsuitable for them, they will be blacklisted from future housing offers (including of permanent housing). Similarly, people are frequently told if they do not take certain offers, their shelters will be destroyed, and they will be forced to live without shelter.

Governments must also accept that people living in encampments are entitled to defend their human rights, and they should have access to legal aid and the support of community advocates in doing so. Making available legal aid, support from community advocates and independent monitors can reinforce respect for rights and demonstrate a willingness to act with transparency and compassion.

It is also important not to assume that a space in an emergency shelter or other temporary accommodation is necessarily a better solution for someone living in an encampment. Spaces in emergency shelters do not offer security of tenure and may be inaccessible or unsafe for many people. They do not always take into account the cultural needs of Indigenous people and can be unsafe for women and members of the LGBTQIA2S+ community. Emergency shelters should not be seen as a mandatory step before someone can access permanent and adequate housing. People have the capacity to transition directly to permanent housing without going to a shelter first. This underlines the need to assess the individual and collective needs of people living in encampments and to avoid putting in place obstacles to their social integration and ability to access adequate housing.

This resource aims to better equip municipalities to respect the human rights of people living in encampments and to provide a framework of intervention that recognizes them as rights holders with the autonomy to act and make decisions about their own lives. It identifies actions that are needed right away to protect the lives, dignity and human rights of people living in encampments. It also encourages all levels of government to continue efforts to progressively realize the right to adequate housing and ensure that appropriate services are available for everyone.

## The Rights of Indigenous Peoples

The *United Nations Declaration on the Rights of Indigenous Peoples* (UNDRIP) identifies “the minimum standards for the survival, dignity and well-being of Indigenous peoples of the world.” (Art. 43) The following UNDRIP articles are particularly relevant:

- **Article 10** prohibits forced removal of Indigenous Peoples from their lands or territories.
- **Article 20** guarantees Indigenous Peoples’ right to their own means of subsistence and development;
- **Article 21** guarantees the right to the improvement of economic and social conditions, including housing;
- **Article 23** guarantees the right to determine and administer programs and services, including housing; and
- **Articles 26–28 and 32** set out Indigenous Peoples’ right to own, use, develop and control their traditional lands, territories and resources, the requirement that states recognize Indigenous land tenure systems and the right to redress and compensation for the occupation, use or development of Indigenous territories without their free, prior and informed consent.

On June 21, 2021, the Parliament of Canada enacted the *UN Declaration on the Rights of Indigenous Peoples Act* (UNDA), which commits the federal government to achieving full implementation of UNDRIP, including by ensuring that federal laws, regulations and policies are consistent with its requirements. The government of British Columbia had previously adopted provincial legislation with similar requirements and intent.

Indigenous homelessness is not only defined by the lack of stable, permanent and adequate housing, but also by the separation of people's relationship with land, water, region, family, fellow human beings, others, animals, cultures, languages and identities.<sup>12</sup> It is crucial to recognize that First Nations people have been dispossessed of their land, and thus their experience of "home" is felt differently than that of non-Indigenous people. Indigenous homelessness is part of the legacy of this dispossession, discrimination and colonial laws and policies such as the *Indian Act*, residential schools and child welfare legislation.

## A Human Rights-Based Approach

Adopting a human rights-based approach to encampments aligns with Canada's human rights obligations and provides a framework for understanding and addressing the systemic nature of homelessness in Canada and designing and implementing long-term solutions to realize the human rights of people living in encampments.

As the name suggests, a human rights-based approach requires a commitment to upholding and being accountable for all human rights for all people, without discrimination. It is also founded on the principles of participation, empowerment and accountability and requires the investment of time and resources in ensuring meaningful engagement with people living in encampments.

A human rights-based approach does not criminalize people experiencing homelessness. It takes care to ensure that responses do not inflict additional harm on people living in encampments. It respects autonomy and choice and attempts to meet people where they are and to support them in accessing adequate housing while respecting their dignity, autonomy and human rights.

A human rights-based approach and an approach that respects Indigenous rights in encampments must also be complemented by Gender-based Analysis Plus (GBA Plus), cultural safety and trauma and violence-informed approaches.

**Gender-based Analysis Plus (GBA Plus)**<sup>13</sup> is an intersectional analytical tool used to support the development of responsive and inclusive policies, programs and other initiatives. GBA Plus goes beyond biological (sex) and sociocultural (gender) differences to consider

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12. Aboriginal Standing Committee on Housing and Homelessness. (2012). Plan to End Aboriginal Homelessness in Calgary. University of Calgary. <https://homelesshub.ca/resource/plan-end-aboriginal-homelessness-calgary/>

13. Gender-based Analysis Plus (GBA Plus). WAGE. <https://www.canada.ca/en/women-gender-equality/gender-based-analysis-plus.html>. Published February 21, 2025.

other factors, such as age, disability, education, ethnicity, economic status, geography (including rurality), language, race, religion and sexual orientation.

**Cultural safety**<sup>14</sup> is the result of a respectful engagement that recognizes and strives to address power imbalances inherent in public systems. It results in an environment free of racism and discrimination where people feel safe when receiving healthcare.

**A trauma and violence-informed approach**<sup>15</sup> requires changes in the way we engage with people living in encampments and how systems are designed. It is crucial in such an approach to understand and recognize the influence and impact of our actions on their lives and behaviour and to create spaces that are both psychologically and physically safe. It is also important to create opportunities where people living in encampments can choose, collaborate and strengthen their capacities. A table of the values and principles of a trauma-informed approach is available for reference.

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14. Common Definitions on Cultural Safety: Chief Public Health Officer Health Professional Forum. (June 20, 2023). <https://www.canada.ca/en/health-canada/services/publications/health-system-services/chief-public-health-officer-health-professional-forum-common-definitions-cultural-safety.html#a4%60>. For more information: First Nations of Quebec and Labrador Health and Social Services Commission. Cultural Safety: A Human Rights Issue. <https://cssspnql.com/en/cultural-safety-a-human-rights-issue/>. Published December 6, 2024.

15. Public Health Agency of Canada. Trauma and violence-informed approaches to policy and practice. <https://www.canada.ca/en/public-health/services/publications/health-risks-safety/trauma-violence-informed-approaches-policy-practice.html>. Published February 2, 2018.



## FACTSHEET 1/8

# Actions to Understand and Respect the Realities of People Living in Encampments

*"There is too much racism and discrimination, and government officials do not understand the needs of people living in encampments who struggle day by day just to survive without a roof over their heads. Their encampments are dismantled or destroyed over and over again, which prevents trust from being built between city officials and people living in encampments". (Stakeholder)*

**A. Recognize that encampments are the result of numerous systemic failures.**

**B. Recognize that it is important to treat people living in encampments with dignity and to respect the spaces and homes they have made for themselves.** In many communities, there are not enough shelter beds that are accessible and adapted to their specific needs. Most people living in encampments would prefer to have access to adequate housing, but they face many barriers due to the cost of housing, the lack of services adapted to their needs and the discrimination they face on a daily basis.

**C. Recognize that there are significant power imbalances** between encampment residents and the service providers, governments, and housed residents who have decision-making influence over most of the resources on which they depend to meet their basic needs. Decisions made about the enforcement of bylaws which may seem minor to those making the decision can have important consequences and make it more difficult for people living in encampments to access what they need to improve their situation.

👉 **Example:** Facilitate the work of independent organizations and advocates to support people living in encampments to actively participate in and influence decision-making processes. Community organizations and advocates can develop a strong bond of trust with people living in encampments and play an important role in ensuring their meaningful engagement and ensuring conditions for more effective collaboration. Ensure people living in encampments have access to legal representation, through legal aid or other means, to defend their human rights when needed, and explore opportunities for restorative justice when harms have occurred.

**D. Recognize that people living in encampments are experts in their reality and are best placed to assess their needs.** They are best placed to identify their needs for survival and priorities for improving their physical and mental health. They should be permitted to make decisions and take the necessary steps to protect themselves from the elements and not be at the mercy of bylaws written without input from people who have lived outdoors.

**E. Recognize that the housing alternatives being offered may not be human rights compliant or meet the definition of adequate housing.** People experiencing homelessness have shared with the Federal Housing Advocate their concerns about housing alternatives they were offered that had serious issues related to their health and safety (e.g., violence, discrimination, bug infestations) and institutional rules that infringed on their dignity and personal autonomy (e.g., curfews, restrictions on visitors and the ability to move about).

**F. Recognize that current emergency shelters and transitional housing may pose greater risks for some people,** specifically, women and people from the 2SLGBTQI+ community, who may face increased danger in shelters or transitional housing than they would living on the street or in an encampment. Emergency shelters and transitional housing also do not provide any security of tenure.

**G. Recognize that First Nations, Inuit and Métis people may have a strong desire to avoid interactions with systems that have been historically oppressive and discriminatory** (e.g., residential schools, child welfare system).

**H. Recognize that restrictions on daytime camping and forced evictions create instability and insecurity for people living in encampments.** These coercive measures create additional hardships for people experiencing homelessness and can have serious repercussions on their physical and mental health.

**I. Recognize that some people living in encampments build a community that provides them with support; ensure that actions do not break relationships with this community, which includes peers, partners, companion animals and others.** It is important to guard against uprooting people from their community and ensure the continuity of support and services that they need to prevent them from returning to the street.

**J. Recognize that people living in encampments are resilient in the face of systemic neglect, and they must focus their daily energy on meeting their basic needs.**

👉 **Example:** People living in encampments will not always be available or able to participate in activities according to the proposed schedule or programs made available to them. Take the time to adapt approaches to their daily reality, and ensure that the timing of interventions does not get in the way of their ability to fulfill their basic needs.

**K. Recognize that people living in encampments also need rest during the day.** There must be spaces made available specifically for them with basic services.

**L. Recognize that people living in encampments will live in public space as long as no suitable alternatives are offered that provide decent, permanent and accessible housing.** Municipal plans must strive to understand the reasons why these individuals are using public space and take steps to protect their fundamental human rights.

**M. Recognize that people living in encampments choose places to settle where they can best meet their needs to have some privacy, to feel safe and to secure and store their personal belongings.** Displacing people and policing where they can erect their tent can make it more difficult to stabilize their situation and improve their well-being.

**N. Recognize that most people living in encampments are affected by trauma,** and it is essential to ensure a trauma- and violence-informed<sup>1</sup> response.

**O. Recognize that people living in encampments may avoid engagement out of fear** that participation could expose them to racism, ableism, eviction or surveillance.

**P. Recognize the importance of raising awareness, and inform the public about the reality of people living in encampments** and the systemic issues that prevent their rights from being respected and fulfilled.

👉 **Example:** Encourage the public to contact a community organization offering social mediation services and established links to people living in encampments rather than the police if they need support in addressing a concern or conflict between housed and unhoused residents.

1. Trauma- and violence-informed approaches are policies and practices that recognize the connections between violence, trauma, negative health outcomes and behaviours. These approaches increase safety, control and resilience for people who are seeking services in relation to experiences of violence or have a history of experiencing violence. For more info, see [the Public Health Agency of Canada website](#).



## FACTSHEET 2/8

# Actions to Recognize and Respect the Human Rights of People Living in Encampments

*"We don't believe that involving people in dismantling the encampment where they live should be considered a good practice. Encampments should be tolerated and people supported until there are adequate and appropriate options to offer." (Stakeholder)*

**A. Formally recognize that people living in encampments are rights holders in all strategies, policies, declarations and laws.** They have the same human rights as everyone else in Canada, and all governments must publicly commit to upholding international and Canadian human rights norms in all responses to homeless encampments.<sup>1</sup> Strategies, policies, declarations and laws that address encampments must be human rights compliant and should be co-developed with people living in encampments to ensure they address their real needs and cause no harm. Action plans and strategies to advance Indigenous rights should be developed with local Indigenous leaders and Indigenous people living in the encampment.

👉 **Example:** Prior to putting place policies, protocols, plans and laws, seek independent advice to review drafts and identify any gaps in compliance with human rights norms as well as Indigenous rights and traditions. If a proposed action might infringe on human rights, it must be reconsidered and not implemented.

**B. Mobilize maximum available resources to ensure that everyone can enjoy the right to adequate housing** without discrimination.

**C. Recognize that the forced dismantling of encampments and other repressive strategies of control and surveillance are harmful** to the physical and mental health of people living in encampments.

**D. Recognize that the forced dismantling of encampments and other repressive strategies of control and surveillance are harmful** to the physical and mental health of people living in encampments.

**E. Draw up concrete action plans that respect human rights principles to help people living in encampments find permanent and adequate housing, and ensure follow through.** Whatever type of housing is proposed as an alternative to living in an encampment, it must respect the seven elements which make up the international definition of the right to adequate housing<sup>2</sup> to guarantee dignified and sustainable conditions.

**F. Ensure people living in encampments have access to legal representation, through legal aid or other means, to defend their human rights when needed.**

**G. Put in place urgent and concrete measures to respect and protect the rights of people living in encampments** to live in dignity, to the highest attainable standard of physical and mental health, to privacy and to protection from arbitrary seizure of their belongings.

👉 **Example:** Coordinate and organize a day with stakeholders and service providers from the community, the public and the municipal sector to offer multiple services directly in the encampment or in the vicinity.

**H. Put an end to bylaws and regulations that criminalize and marginalize people experiencing homelessness for occupying public space.** Put an end to practices which result in the destruction or confiscation of personal belongings. Such measures make people living in encampments feel more insecure and can lead to a violation of their human rights, including the right to life.

👉 **Example:** Review current bylaws and regulations in consultation with people with experience living in encampments, and revoke those that criminalize people experiencing homelessness or are used disproportionately against people living in encampments.<sup>3</sup> Do not seize the belongings people need for survival.

**I. Put in place permanent, effective and accessible accountability mechanisms** that are accessible and have simplified procedures for people living in encampments to file complaints about harassment, intimidation and non-respect of human rights or existing policies and protocols. Ensure access to legal aid and provide timely responses and genuine follow-up.

👉 **Example:** Appoint an independent person or instance with the power to act who can represent the interests of people living in encampments. Provide education and resources to people living in encampments so they can voice their concerns to actively promote and defend their human rights.

**J. Support people living in encampments to take part in the decisions that concern them** and respect their right to decide what is best for them and their security. No alternative should be imposed or actions taken that will worsen their situation. See the actions under Principle 8 for more details.

**K. Use existing human rights-based resources to inform responses and strategies to support people living in encampments.**

👉 **Example:** Review these resources and others and consider how you can change your policies, protocols and plans:

- [Upholding Dignity and Human Rights: The Federal Housing Advocate's Review of Homeless Encampments](#)
- [Encampments and legal obligations: Evolving rights and responsibilities](#)
- [National Protocol for Homeless Encampments in Canada](#)
- [Homeless Encampments: Municipal Engagement Guidance](#)

**L. Dedicate sufficient financial resources to ensure meaningful engagement** with people living in encampments.

👉 **Example:** When developing budgets, ensure specific allocations are available to support engagement with people living in encampments and local Indigenous leaders. Budgets should include amounts for honoraria, food and beverages, transportation and other needs that may be identified by people living in encampments.

**M. Immediately halt practices which traumatize and destabilize people living in encampments,** including forced evictions, dismantling encampments and violence.

👉 **Example:** Put in place policies based on respect for human rights, and provide training to prevent micro-aggressions, such as denigration of particular groups, intimidation, harassment and the destruction of personal belonging required for survival, including items used for drug consumption.

**N. Abolish** hostile architecture and urban planning practices designed to prevent people experiencing homelessness from sitting, sleeping or taking shelter in the public space, as these contribute to the daily challenges they face and hinder their survival capabilities.

👉 **Example:** Involve people living in encampments in the design of urban renovation projects to ensure solutions meet the needs of all people using public space, as they know their environment and needs. For example, a municipality can make a heated bus shelter available so people can protect themselves from cold weather.

1. For more details, see Upholding dignity and human rights: The Federal Housing Advocate's Review of Homeless Encampments and the [National Protocol for Homeless Encampments in Canada](#)

2. [UN Habitat Fact Sheet No. 21, The Right to Adequate Housing](#)

3. In the last 30 years, new or revised anti-homeless laws have been enacted across Canada targeting the presence and survival activities of homeless people in public spaces. The offence types include: panhandling, loitering, obstructing, salvaging/scavenging, resting/sleeping and disorder. Hermer, J., & Fonarev, E. (2020, July 12). Neo-Vagrancy Laws in Canada. Retrieved from: <http://covid19-phi.ca/>



## FACTSHEET 3/8

# Actions to Recognize and Respect the Rights of First Nations, Inuit and Métis Peoples

*"We protect ourselves and others."*

*(Indigenous person living in a camp)*

**A. Recognize, respect and protect the distinct rights of Indigenous people in all contacts with encampment residents.**

**B. Recognize their rights to self-determination and self-governance** and cease applying colonial regulations and laws to control or criminalize them.

**C. Work with local Métis, Inuit and First Nations governments to design and implement housing solutions that reflect self-governance and community-specific needs.**

**D. Recognize that First Nations, Inuit and Métis people** may have a strong desire to avoid interactions with colonial systems that have been historically discriminatory and oppressive (e.g., police, emergency shelters and health care facilities).

**E. Recognize the systemic oppressions** that have undermined the confidence of Indigenous people in colonial institutions and practices.

👉 **Example:** Hire more Indigenous workers to support Indigenous people living in encampments, and ensure the adoption of cultural safety in all activities.

**F. Implement the [calls to action of the Truth and Reconciliation Commission](#) and the calls to justice of the National Inquiry into Missing and Murdered Indigenous Women and Girls.<sup>1</sup>**

**G. Ensure that the meaningful engagement with Indigenous people living in encampments is Indigenous led to promote genuine dialogue guided by “mutual respect, good faith and the sincere desire to reach agreement.”**

**H. Work with Indigenous entities to co-develop engagement processes with Indigenous people,** particularly Indigenous individuals living in the encampment, to ensure that the processes recognize Indigenous rights, are culturally appropriate and result in meaningful engagement.

👉 **Example:** Collaborate with local friendship centres and other Indigenous-led groups that provide essential services and a safe and secure environment to the Indigenous population.

**I. Engage with representatives chosen by Indigenous individuals in the encampment,** in accordance with their own procedures and practices.

**J. Work with higher orders of government to ensure sufficient funding assistance for urban Indigenous populations.**

**K. Provide resources to ensure the meaningful participation Indigenous people living in encampments.**

**L. Respect and implement Indigenous protocols and decision-making processes in responding to encampments inhabited by Indigenous people.**

👉 **Example:** Facilitate the visits of Elders to the tent city as often as possible to talk about traditional medicines and well-being, and enable Indigenous people living in encampments to have Sacred Fires. Elders should be people trusted by the people living in encampments and ideally come from the host First Nation.

For many First Nations, it is appropriate to offer tobacco when meeting with Elders, but it is important to research and understand the Indigenous protocols in your area. Elders should also be offered a stipend to cover travel and other costs.

**M. Ensure Indigenous-led housing solutions** by financing and endorsing Indigenous organizations, such as friendship centres, to be key actors in encampment responses.

**N. Ensure that municipal policies distinctly acknowledge** and address the housing and homelessness needs of urban Indigenous populations independently from on-reserve initiatives.

1. In particular, implement the housing-related recommendations in [Section 4 – Calls for Justice for All Governments: Human Security](#).



## FACTSHEET 4/8

# Actions to Build and Maintain the Trust of Encampment Residents

*"Start with small actions that build trust, like keeping a promise. Don't just show up one day and say you're suddenly going to listen and be respectful after not doing so before." (Person living in an encampment)*

**A. Take the time to build relationships with people living in encampments**, understanding that their communication methods may be different. Recognize that they have to prioritize just meeting their daily needs because of the inadequacy of the services that are available and adapted to their needs.

👉 **Example:** Plan engagement activities keeping in mind the schedules and needs of people living in the encampment.

**B. Take the time to get to know the people living in encampments**, and ask if and when they are available and willing to discuss the subjects you want to talk about. Avoid making assumptions.

👉 **Example:** Always ask permission to start a conversation, and confirm that the person you want to speak with is also comfortable speaking with you before you begin. Understand some people may have challenges expressing themselves or have more pressing priorities.

**C. Recognize that people living in encampments bear the consequences of systemic failures and injustice and that they may express strong emotions** and frustration stemming from feelings of being trapped and the absence of solutions that meet their needs and respect their right to housing.

👉 **Example:** Take time to listen. Use compassion, empathy and patience to get people to open up and express themselves. Prioritize the issues that people living in encampments have identified as urgent to improve their physical and mental health.

**D. Welcome people where they are and demonstrate your interest in their reality.** Create opportunities where they can express themselves freely without fear of consequences. Avoid assumptions about their capacity and what they need.

👉 **Example:** Pay close attention to the sense of attachment and belonging that individuals have to their surroundings and living space, as well as the reasons that lead them to choose one place over another.

**E. Foster authentic and lasting relationships by centring interventions** that support the well-being of people living in encampments, addressing their expressed and prioritized needs and offering solutions tailored to their individual and collective situations.

👉 **Example:** Ask permission before entering a person's living space, and offer resources or services that can improve their living conditions, such as lockers to store personal belongings and reduce the risk of theft and back injuries from continuously carrying a heavy load of their possessions.

**F. Ensure interactions with people living in encampments are grounded in the principles of active listening, respect, cultural sensitivity, transparency and non-judgment, regardless of conditions or choices.**

👉 **Example:** Avoid stigmatizing remarks towards people living in encampments, even when they are not present, as this will harm trust and collaboration. Do not define the person by their situation.

**G. Provide resources for people living in encampments to ensure that they can defend their human rights, and act quickly in case of harm.**

👉 **Example:** Create simplified guides on the human rights of people in encampments that clearly outline international and domestic human rights obligations and any guidelines established by the municipality to respect them. Appoint an individual with the authority to respond quickly to the concerns of people living in encampments.

**H. Try to ensure continuity within the teams working with people living in encampments** to ensure consistency of approach, build confidence and reinforce stability.

**I. Ensure there is follow-up on the commitments made to people living in encampments.** Making realistic commitments and avoiding the creation of false expectations will strengthen trust.

👉 **Example:** Municipal employees can provide their contact details so that people living in encampments can request information and resources or follow up on a request for support.



## FACTSHEET 5/8

# Actions to Provide Services Adapted to the Needs and Realities of People Living in Encampments

*"I get judged in the street, so how can anyone take what I have to say seriously? It's hard when you don't have access to basic dignity and basic needs, and it's hard to want to get involved when you don't believe you'll be heard and accepted."*

*(Person living in an encampment)*

**A. Take immediate measures that will protect the right to life and the dignity of people living in encampments**, including installing and making accessible essential facilities and services such as clean drinking water, sanitation, showers, cooking facilities, recharging stations, secure storage and waste collection.

👉 See the [list of essential services](#) developed by the National Working Group on Homeless Encampments.

**B. Provide support to improve the physical and mental health of people living in encampments as required and on a consent basis.** When services cannot be provided on site, provide resources to facilitate travel and access to the needed resources.

👉 **Example:** Offer healthcare services directly in encampments for individuals and veterinary care for their pets. Providing care for pets helps people living in encampments maintain their bond with their animals, reduce the distress of losing them and learn to take better care of themselves<sup>1</sup>

**C. Consider creating zones where encampments are tolerated or even accepted** without forcing people to occupy them and without criminalizing them for not doing so. If these zones are created, they should respect human rights principles and adhere as much as possible to the criteria outlined in the definition of adequate housing: security of tenure from the threat of forced evictions; habitability (e.g., protection from the elements, privacy); location (e.g., land free from hazards and pollution); availability of services (see the list of essential services); and cultural adequacy.

**D. Work with people living in encampments to find solutions to issues that they raise about their site.**

Make sure you fully understand the concerns people have about their encampment, and explore options with them for improving their situation.

👉 **Example:** If your municipality has a telephone or online help line, ensure that it is accessible and that operators are equipped to respond to issues raised by encampment residents.

**E. Support harm reduction practices for people using substances in encampments** by providing

services and access to a safe supply program and by developing action protocols with them to save lives and mitigate the risk of substance-related overdoses.

**F. Take steps to ensure emergency shelters and drop-in centres are barrier-free and accessible 24/7**

and that there are enough resources available to meet the needs of those wishing to use them.

**G. Ensure sustained funding for community-based services and initiatives** that adopt a human rights-based approach to providing support for people living in encampments.

**H. Respect the right of people living in encampments to refuse the services offered to them**, and try to

understand the systemic issues that may have caused them to refuse.

👉 **Example:** Take the time to understand their refusal and use the opportunity to reflect on how you can improve services and ensure they are adapted to the needs of the people living in encampments.

**I. Ensure accountability for respecting and protecting human rights** and avoid repressive and coercive practices.

👉 **Example:** When there is a concern about garbage in an encampment, make resources available for the clean-up. Ensure the people living there are involved and alternatives are put in place to protect the belongings of people living in the encampment.

**J. Ensure effective communication, coordination and collaboration between services and stakeholders**, and ensure people living in encampments have a clear explanation of the roles of municipal actors and service providers.

👉 **Example:** Collaborate with respected community leaders chosen by people living in the encampment to facilitate sincere dialogue and collaboration in the best interests of people living in encampments.

**K. Demonstrate transparency, consistency and fairness** to reduce any potential for confusion and misunderstanding that can undermine trust and the ability to engage people living in encampments.

**L. Provide training to raise awareness of human rights** among people living in encampments.

👉 **Example:** Create collective or individual opportunities to build capacity to help people living in encampments defend their rights. Provide the necessary conditions for them to participate (e.g., familiar and accessible locations, healthy snacks, remuneration, access for pets and secure storage for personal belongings).

**M. Provide training to decision-makers, police and intervention teams** on human rights and Indigenous Rights, Gender-based Analysis Plus (GBA Plus), cultural safety and trauma- and violence-informed approaches.

👉 **Example:** Develop training tools with people living in encampments, and value their participation in the programs.

**N. Ensure people living in encampments are able to protect themselves during difficult weather conditions.**

👉 **Example:** Prepare for weather emergencies, and put in place emergency resources that can help people obtain clothing, equipment and access places that are dry, warm or cool during extreme weather conditions.

**O. Ensure that the support services needed to improve the health and well-being** of people living in encampments are available when they are needed and that transportation is not an additional barrier to accessing services.

👉 **Example:** Provide clear information on available services and their schedules by providing 24/7 street workers and a telephone line, making a public touch-screen accessible and increasing internet access for research.

**P. Identify individual and collective needs regarding living conditions, safety, services** and housing in order to offer tailored solutions to each person living in an encampment while respecting and preserving their social ties and sense of belonging.

👉 **Example:** Ensure the housing options offered allow people to maintain their relationships in the community. A small-scale rooming house might allow them to maintain their social network.

1. Leblanc C, Morin P. The Pet, an important ally for people Living on the streets. International Journal on Homelessness.

<https://doaj.org/article/f6809776b08c4e3285947fb3e60305de>



## FACTSHEET 6/8

# Actions to Facilitate Participation in Decision-Making

*"I couldn't even properly form sentences without having to sit down and take a break to let my brain catch up with what I was trying to express, which made it nearly impossible to clearly explain what I wanted to say. Being in a bad situation and dealing with severe mental health issues caused by a multitude of factors can make it almost impossible to communicate." (Person living in an encampment)*

**A. Understand the individual and collective realities of people living in encampments in order to create consultation and engagement processes adapted to their needs**, and provide the supports and environment they need to be able to express themselves.

👉 **Example:** Provide nourishing food, clean clothes, access to a shower, the necessary electronic equipment and supports to help people to prepare to participate in meaningful engagement. It is also important to use a variety of methods of expression, including written, oral and artistic. Include options for individual as well as group activities to ensure everyone has a chance to contribute based on their capacity and needs.

**B. Consult and involve the people living in encampments from the beginning** in the planning, implementation and monitoring of services in the encampments (toilets, showers, food distribution, health services, etc.), and involve them in decisions regarding how funds are allocated and spent on encampments and homelessness services.

👉 **Examples:** Elected officials should meet with people living in encampments either on-site or in spaces where they will feel comfortable (e.g., the office of a trusted community organization that provides them with services). Work with trained mediators and facilitators who can help create the right conditions for effective dialogue.

**C. Offer people real choices and provide them the opportunity to make informed decisions.**

👉 **Example:** If housing becomes available, take the time to explain the options. What is the space that is available and for how long, and what rules, if any, might apply? Allow people to visit the space and take the time to consider the consequences for themselves. People should not be forced to make choices under threat of eviction and of confiscation or destruction of their personal belongings.

**D. Ensure that the voices of people living in encampments are considered with the same value as other stakeholders involved in decisions.**

👉 **Example:** Organize an event that includes both people living in encampments, the local population, as well as community, public and governmental actors while ensuring the reduction of power imbalances. [See the guide for integrating people living in encampments into events.](#)

**E. Recognize the contributions of people living in encampments and their input into the policy-making process by compensating them for the time they contribute to engagements and ensuring follow up on their contributions.** It is also important that people understand that they can leave a session at any time without any repercussions.

**F. Assess and respect the priorities and needs based on the views expressed by people living in encampments.**

👉 **Example:** Note that people's needs may change depending on the precarity of their living conditions and circumstances.

**G. During meetings, ensure the creation of safe spaces by using trauma-informed and culturally safe approaches.**

👉 **Example:** Avoid situations where people living in encampments have to share their personal life experiences and risk reliving traumas. Instead, create spaces where people themselves express the situations they wish to share. Ensure that people leading engagements are trained in violence- and trauma-informed approaches and cultural safety practices that enable them to respond with compassion and support as needed.

**H. Implement specific measures to facilitate the participation** of people living in encampments with an addiction.

👉 **Example:** Provide a non-judgmental participation environment, ensuring access to safe consumption services based on their needs and the duration of the meeting, and adapt to their schedules so that people who use substances are not excluded and can feel acknowledged.

**I. Plan engagement methods suitable for people who are unable** to leave their encampment (e.g., there is a high risk of theft of their belongings).

👉 **Example:** Provide a secure storage area, have a trusted person monitor tents and belongings or schedule meetings near their living area.

**J. Rethink the structure of meetings to adapt to the realities** of people living in encampments and to maximize their time and knowledge. Provide the necessary information and tools for people living in encampments to participate effectively in the engagement.

👉 **Example:** Ensure information provided is available in plain language and in the languages spoken by the people living in the encampment. It is important to ensure all material is inclusive, accessible and takes into the account the needs of people, notably people with disabilities, including disabilities related to cognitive functions.

**K. Be as transparent as possible about potential short-, medium- and long-term benefits of engagement to enhance motivation and participation in decision-making processes.**

👉 **Example:** Provide feedback to people living in encampments about what is working well during engagements. Let them know what can be improved to increase their influence in the decision-making process.

**L. When working with people living in encampments, recognize and value the skills** that they bring, and take advantage of opportunities to reinforce their capacity as actors in their own lives.

**M. Question and rethink collaboration strategies when multiple people** do not wish or are unable to participate by examining the reasons that hinder their meaningful engagement.

👉 **Example:** Explore and try to understand the barriers people may experience (e.g., trust, physical accessibility and lack of information or time) and try to design a process that takes them into account to maximize participation.



## FACTSHEET 7/8

# Actions that Support the Self-Determination and Autonomy of People in Encampments

*"When government representatives speak publicly about the encampment situation, they should address the people living in them directly." (Stakeholder)*

**A. Continuously inform people living in encampments about their rights** and the government's obligations to respect them, and work with them to find the best communication strategies for establishing an effective and respectful collaboration.

👉 **Example:** Prepare a simplified document or a poster explaining the human rights obligations of government actors, including law enforcement, as well as available options for making a human rights claim or pursuing a complaint.

**B. Work with people living in encampments and informal leaders at a pace that suits them** to develop tailored solutions to defend their human rights, meet their needs, improve their physical and mental health and stabilize their situation.

👉 **Example:** Regularly collect feedback from people living in encampments and continuously assess the practices implemented while taking preventive actions for potential issues.

**C. Encourage and support self-managed dialogue spaces** by and for people living in encampments, in collaboration with advocacy organizations they trust, and provide the necessary resources to help them organize autonomously.

👉 **Example:** Support the creation of governance committees primarily or solely composed of people living in encampments so they can discuss their issues, determine their needs and solve their problems.

**D. Recognize and respect the internal dynamics of encampments**, and allow people to choose with whom they feel safe living.

**E. Provide resources to allow people living in encampments to manage services on their own** (e.g., garbage collection or meal preparation) and support them by offering flexible day work schedules and opportunities.

👉 **Example:** Develop accessible community facilities to encourage mutual support (e.g., collective kitchens), and use municipal structures to increase their capacity to meet their needs.

**F. Work with people living in encampments to reduce risks, and share the responsibility for their safety.**

Support them to establish procedures in case of incidents, and provide training to build knowledge, skills and empowerment.

👉 **Examples:**

- Offer training in suicide prevention, conflict de-escalation, fire safety, harm reduction (Naloxone) and first aid (injuries, burns, CPR, etc.).
- Provide safety equipment (fire extinguishers, winterized tents), and ensure people have what they need to protect themselves from the elements, including access to warming or cooling centres.
- Offer clear information to people living in encampments on how to layout tents in a safer way (e.g., three feet from another tent) and suggest assembly points in case of fire.
- Share advice on food storage to reduce the risk of spoilage and vermin, management of donations and emergency care. Make telephones available for emergencies.

**G. Ensure predictability when decision-makers and people in positions of authority visit an encampment**

by announcing their visit in advance, posting information and distributing brochures to raise awareness.

👉 **Example:** During cleaning teams' visits for waste collection, the presence of independent and trained observers can help reinforce respect for human rights standards by the municipal authorities and private entities involved.

**H. Facilitate the presence of independent, trained observers to encourage compliance with human rights standards** in encampments by the municipal authorities and private entities involved.

👉 **Example:** Work with community organizations, advocates and Indigenous leaders who are trusted by people living in encampments and who can act as observers and human rights defenders.



## FACTSHEET 8/8

# Actions that Continue to Work Towards Long-Term Adequate Housing Solutions

*"There should be diversity in housing choices, locations and services provided—there is no single shelter/housing option that fits everyone. Consult with those living on the streets to design safe, adequate and diverse housing models." (Stakeholder)*

**A. Advocate with other levels of government to ensure long-term investments in adequate, affordable housing** as well as support services for people exiting homelessness and transitioning into housing.

**B. In areas where municipalities can act, facilitate the construction of adequate housing to support people in their transition from encampments to safe, adequate and permanent housing solutions.**

👉 Municipalities should consider:

- Providing surplus municipal land at no cost in areas close to transit and other necessary amenities to non-profit affordable housing providers or land trusts.
- Implementing zoning and other changes to fast track the development of community housing.
- Exploring how waiving development and other municipal fees can help to fast-track non-profit housing that is affordable for people exiting homelessness and to support the operations of the housing providers over the long-term.
- Developing specific initiatives to support urban Indigenous housing.

**C. Advocate for laws and policies that make evictions from housing more difficult and make it harder to discriminate against people in need of housing.**

👉 **Example:** Landlords should not be allowed to discriminate on the basis of warrants or criminal records.

**D. Ensure that zoning, bylaws and municipal policies facilitate the protection of existing low-income housing**, such as rooming houses and cooperatives, and don't create barriers to innovative new approaches to housing for people experiencing homelessness.

**E. Put in place eviction prevention programs as an early intervention measure to stabilize the housing of people at risk of homelessness.**

👉 **Example:** Eviction prevention measures include rent banks, energy assistance programs, community legal clinics, credit counselling and mediation.

**F. People should be provided with a variety of housing options and locations that meet their needs and are adapted to their personal situation.** Allow people to make choices and take control over their lives.

**G. Ensure that the transitional and supportive housing that is offered is compliant with human rights principles.** Residents in these buildings should be afforded the same rights as tenants, as per the landlord and tenant regulations in force in the province.

👉 **Example:** Do not impose restrictions, such as preventing visitors or requiring total abstinence from consumption. This type of transitional housing should not focus on control measures, but on personal empowerment and responsibility.

**H. Provide housing subsidies and programs adapted to the realities of people living in encampments to help them move into permanent housing solutions.** Emergency shelters and supportive housing options are not enough, as they do not meet the definition of adequate housing set out in UN international standards.

👉 **Example:** People living in encampments should not be obliged to stay at an emergency shelter or in transitional housing before they can move to permanent housing.

**I. Be transparent** about when adequate housing will be available. Provide clear information to people living in encampments about new housing projects that can meet their needs, and update them on the progress of their construction.

**J. Ensure that different levels of government share the same priorities** regarding human rights and homelessness, because it does not work when one level of government focuses on initiative "A" and the other on initiative "B."

1. OHCHR, [Fact Sheet No. 21 \(Rev.1\): The Right to Adequate Housing](#), United Nations, Geneva, 2009.

THE REGIONAL MUNICIPALITY OF  
WATERLOO  
Applicants

and

PERSONS UNKNOWN AND TO BE  
ASCERTAINED  
Respondents

Court File No.: CV-25-00000750-0000

**ONTARIO  
SUPERIOR COURT OF JUSTICE**

Proceeding commenced at KITCHENER

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Lawyers for the Respondents

**TAB 34**

**ONTARIO  
SUPERIOR COURT OF JUSTICE**

B E T W E E N:

THE REGIONAL MUNICIPALITY OF WATERLOO

Applicant

and

PERSONS UNKNOWN AND TO BE ASCERTAINED

Respondents

APPLICATION UNDER Rule 14.05 of the *Rules of Civil Procedure*

**AFFIDAVIT OF SARAH MAGDALEN HELWIG**

I, Sarah Magdalen Helwig, of the City of Toronto, 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 the current incumbent priest of the Church of St. Stephen-in-the-Fields (the “Church”). I have been in this position for 12 years.
3. There have always been small numbers of people living in the churchyard. In the spring of 2022, the encampment started to grow in size as other encampments in Toronto were cleared.

4. I was involved in supporting the people at the encampment from the beginning. We worked to connect encampment residents to services and supports.
5. Most of the encampment at the Church is located upon a transportation right of way that belongs to the City of Toronto (the “City”).
6. In 2023 there was a concerted effort by staff from the City to clear the encampment. When we were informed that a clearance attempt was imminent, we applied to Superior Court for an injunction to stop the clearing.
7. The motion for the injunction was denied and in late 2023, most of the residents were offered a room at a shelter hotel by City staff.
8. Not all encampment residents accepted the offer of shelter hotels. Some of the encampment residents had been evicted multiple times from shelter hotels. The shelter hotels have numerous rules and there is no security of tenure for residents.
9. People can be evicted from shelter hotels for a variety of reasons and there is a low bar for eviction.
10. On January 2, 2024, I published an article about the clearing of the encampment, titled “City clears encampment outside church”, a copy of which is attached as **Exhibit “A”** to this affidavit.

11. To the best of my knowledge, all of the encampment residents who were evicted from the encampment and placed in shelter hotels are back living on the streets.

12. The encampment at the Church has built back up to 9 residents, most of whom are the same as the residents who were evicted by the City in 2023.

13. I make this Affidavit in response to the Notice of Application, and for no improper purpose.

AFFIRMED remotely by Sarah Magdalen )  
Helwig at the City of Toronto, in the Province )  
Of Ontario, before me at the Town of Baden )  
in the Province of Ontario on July 2, 2025 in )  
accordance with O. Reg. 431/20. )



---

Ashley Schuitema, A Commissioner of  
Oaths (LSO # 68257G)



---

SARAH MAGDALEN HELWIG

THIS IS EXHIBIT "A" REFERRED TO  
IN THE AFFIDAVIT OF SARAH MAGDALEN HELWIG  
SWORN REMOTELY AT THE  
CITY OF TORONTO BEFORE ME AT THE TOWN OF BADEN  
DURING A ZOOM VIDEOCONFERENCE  
IN ACCORDANCE WITH O.REG. 431/20,  
ADMINISTERING OATH OR DECLARATION REMOTELY  
THIS 2<sup>ND</sup> DAY OF JULY, 2025



---

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

# The Anglican

(<https://theanglican.ca>)



## **City clears encampment outside church**



**Supporters gather outside St. Stephen-in-the-Fields in Toronto before City of Toronto crews move in to tear down an encampment for unhoused people outside the church.**

BY THE REV. CANON MAGGIE HELWIG ([HTTPS://THEANGLICAN.CA/AUTHOR/MAGGIE-HELWIG/](https://theanglican.ca/author/maggie-helwig/))

ON JANUARY 2, 2024

PHOTOGRAPHY: MICHAEL HUDSON

TOPICS: JANUARY 2024 ([HTTPS://THEANGLICAN.CA/TOPICS/JANUARY-2024/](https://theanglican.ca/topics/january-2024/)), SOCIAL JUSTICE AND ADVOCACY ([HTTPS://THEANGLICAN.CA/TOPICS/SOCIAL-JUSTICE-AND-ADVOCACY/](https://theanglican.ca/topics/social-justice-and-advocacy/))

## **Yard used by parish fenced and blocked**

*After a year of intermittent threats to clear the encampment of unhoused people at St. Stephen-in-the-Fields in Toronto, staff from the City of Toronto's Encampment Office informed the incumbent in mid-October that the yard would be cleared within a week because a "community group," never before heard of in the community, had obtained a permit to put in a pollinator garden. The parish made the difficult decision to retain a law firm to fight this. Almost immediately, the city's legal department stated that the permit had been withdrawn, but that the encampment would still be cleared due to a fire risk. Offers from the parish to work with the city to mitigate fire risk were refused. On Nov. 20, a judge rejected the parish's application for an injunction to prevent the clearing.*

A year ago, I wrote in this paper, “We will be, until we can be no longer, the last safe place.” On Nov. 24, after months of negotiation, struggle, compromise and crisis, that safety was broken.

It was not as bad as it might have been, when City of Toronto crews came to clear our encampment. I know that there were people within the large and complicated structure that is the City of Toronto who tried to make this less than brutal, who did what they could, and they did make a difference. Shelter Services had reserved shelter-hotel rooms for the people in the encampment who wanted them, though what this meant was that those rooms were not available for others seeking indoor space the previous night, and we know that many were turned away that night. Some people took the rooms, and that is a very good thing, though the rush, the stress, the need to pack a bag instantly and go, led to several breakdowns and medical crises over the course of the day, and some emotional damage that has not yet healed. Others were squeezed onto the small area that is indisputably church property, though we don’t know how long they will be permitted to stay. Some had already left two days earlier, when city staff first told them that the area was going to be cleared.

Then, at some point in the afternoon, one person refused to move. They had accepted referrals to shelter-hotels twice over the past year, and both times had been evicted within days for trivial reasons. This was their home, the one place that had never told them to leave. Staff from the Department of Transportation handed them a notice of trespass. They read it over, said, “You got the name wrong,” and handed it back.

We stood for hours, then, in the bitter cold – supporters, media, residents trying to rebuild their tents along the side of the church. We brought hot water bottles and French vanilla coffee and vegetarian curry to the one person who wouldn’t leave, as they wrapped themselves up in blankets and quietly whispered prayers. It was after sunset, and church volunteers were trying to serve our weekly drop-in dinner, by the time the city staff brought in the machine that we know as the Claw, a huge piece of heavy machinery that seizes tents and belongings and recycling bins indiscriminately and drags them into a trash compactor. In the dark, the Claw was driven through a narrow residential street, to scrape all signs of human occupation from half of the churchyard.

In the other half of the yard, the remaining resident and I stood protected by a patio umbrella, watching. We didn't know if the police would be coming to take them. But police did not come for them. Good people in several different places, that night, people I know but can't name here, were able to shape some decisions. Supporters blocked the Claw for a while, and others used the time to gather up the belongings of the people who had been hastily dispersed. The Claw moved back and forth across the small street, and neighbours, seeing it from their windows, ran down from the apartment building next door to join our supporters. It was nearly midnight by the time it ended, by the time an eight-foot- high security fence went up around half of the area that had been used as the churchyard for over 100 years, which has now been claimed by the Department of Transportation as their own. A few days later, more city trucks arrived, and, with no warning, deposited huge concrete blocks over the entire fenced area. The yard which had, for so long – long before the encampment, long before I was the incumbent – been a place where people could come when they were lost or hungry or in need of help, was now fenced and blocked, and made as inhuman as the resources of the city could make it.

But when the crews left, the one person who would not leave was still there, with their tent and their belongings, and they are still there now as I write this in early December. Others are still camped along the side of the church. The human community that has grown here has not been destroyed. And so we enter Advent. Let the skies pour down righteousness.



*The city puts cement blocks in the cleared area and surrounds it with a fence.*



## By **The Rev. Canon Maggie Helwig** (<https://theanglican.ca/author/maggie-helwig/>)

The Rev. Canon Maggie Helwig is the incumbent of St. Stephen-in-the-Fields, Toronto.

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## **A journey ends, another begins** (<https://theanglican.ca/a-journey-ends-another-begins/>)

January 1, 2015

THE REGIONAL MUNICIPALITY OF  
WATERLOO  
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Court File No.: CV-25-00000750-0000

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**ONTARIO  
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**RESPONDING RECORD**

**VOLUME 3 of 4**

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