



Permanent Accessible Dignified Safe Housing for All!

With a housing crisis raging, more than 2.8 unhoused people for every available shelter bed, and perpetual delays in the promised supportive housing options becoming available, the city has up until now had a de facto policy of allowing people to live in tents and crisis shelters across Halifax. However, a recent staff report has signaled that unhoused people will be at great risk of forced eviction in the coming days and weeks, despite the fact that no new indoor housing options have become available. Already, P.A.D.S. has received a report that a crisis shelter has found an eviction notice outside its door.

Last Friday, Halifax Regional Municipality (HRM) staff released [a report](#) about the city's approach to homelessness and encampments. The report recommends designating outdoor sheltering spaces where unhoused people would be permitted to set up a tent. It establishes two types of designated sheltering areas: one-night only and long-term, or multiple-night stay locations. At the first type of location, unhoused people can only set up a tent after 8pm, and the unhoused person is expected to pack up and leave¹ by 8am. As the name suggests, multiple-night stay locations allow a person to set up a tent for multiple days and nights. There are only five long-term sheltering areas (three in Dartmouth, one on the peninsula, and one across from Frog Pond), and each can only accommodate at most² four people.

Despite the fact that these spaces can only accommodate a maximum of 20 people total, the staff is recommending that the city immediately adopt a measure that would "require the removal of, or remove, tents, shelters, or other structures in parks outside of designated areas."

¹ While unhoused people are permitted to be in parks after 8am, the report specifies that the occupant should "move on from that location by 8am". This suggests that even if the tent is taken down, the unhoused person could be harassed for remaining in the park. The wording also suggests that they would not be allowed to set up a tent again at the same location at 8pm. Page 6. "Homelessness and Encampment Approach" May 3, 2022

² According to the report, "Depending on site configuration, some locations may only be able to (sic) a smaller number of tents." This suggests that some of these long-term tenting sites may not even have room for 4 tents. Page 7. "Homelessness and Encampment Approach" May 3, 2022

According to an HRM staff report dated April 12, 2020, “staff are aware of more than 20 locations at which people are sleeping outside.”³ The report that cites the “more than 20 locations” also puts the total number of unhoused people at “over 450”. However, since that report was written, the number of unhoused people on the by name list has increased to 562. What’s more, as cited in this most recent HRM report, “several service providers indicated that they are not placing some names on the By Name list as they know there are no housing options for those clients. All stakeholders said that they believe the number of homeless will continue to rise dramatically in the future, especially when the Provincial cap on rent increases is removed.”⁴

It is important to note that no unhoused residents were consulted in the drafting of this report, despite an otherwise wide range of “stakeholders” who were interviewed. According to [the report](#), “A National Protocol for Homeless Encampments in Canada”, developed by the UN Special Rapporteur on the Right to Housing, the second principle (after recognizing the residents of encampments as rights holders) is “Meaningful engagement and effective participation of homeless encampment residents.” This principle states that, “Residents are entitled to meaningful participation in the design and implementation of policies, programs, and practices that affect them. Ensuring meaningful participation is central to respecting residents’ autonomy, dignity, agency, and self-determination. Engagement should begin early, be ongoing, and proceed under the principle that residents are experts in their own lives. The views expressed by residents of homeless encampments must be afforded adequate and due consideration in all decision-making processes. The right to participate requires that all residents be provided with information, resources, and opportunities to directly influence decisions that affect them.”

While this report recommends creating a “first voice advisory committee”, this work has not yet been done, despite a motion passing to get a staff report on creating a “Lived Experience Advisory Committee on Homelessness for HRM” last August. It would be a violation of encampment residents to allow their forced removal to relocate them in a space that they had no opportunity to input into the design of. Furthermore, a human rights compatible encampment protocol would:

- Prohibit forced evictions of homeless encampments (Principle 3)
- Explore all viable alternatives to eviction – including ensuring that encampment residents have access to free and independent legal advice (Principle 4)

³ Page 4. “Emergency Supporting Housing Shelter Accommodation update” April 12, 2020. <https://cdn.halifax.ca/sites/default/files/documents/city-hall/regional-council/220412rci02.pdf>

⁴ Page 3, Attachment 1 – Interim “What We Heard” report. “Homelessness and Encampment Approach” May 3, 2022

- Ensure that any relocation is rights-compliant, including meaningful and on-going engagement and that all necessary amenities must be provided to all residents prior to any eviction (Principle 5)

Despite not consulting any unhoused people to arrive at the recommendations of the staff report, it does lay out a process for removing tents, crisis shelters, and moving the residents to another location. The report recommends a process⁵ by which anyone in the HRM can report a tent or shelter using 311. At that point, a navigator or service provider will be connected to the shelter or tent occupant. If the shelter or tent is confirmed as unoccupied (process unknown), then it will be removed and the person's belongings (not shelter materials) will be held for an unspecified amount of time. If the shelter is occupied, the worker will "gather information about" the occupant and can require them to move to a designated space before any housing is found. If they refuse, then "enforcement actions" will take place.

This process is a clear violation of the occupant's rights to housing, and within that, the right to be meaningfully engaged, as this process does not make space to hear the concerns, needs or desires of the unhoused residents, let alone accommodate those issues.

In terms of the amenities the outdoor sheltering spaces will be equipped with, the report states that "for locations designated as sheltering places for multiple nights, some form of toilet facility should be provided and, if possible, a water source. These sites should have garbage cans and regular collection and an option for dry goods storage, such as a play box."⁶ These are scant amenities considering that many unhoused residents will be forced to leave a situation where they have four walls and a roof, or in some cases warm food support or access to other services, to be forced to a location where it is questionable if a tent, sleeping bag and pad will even be available (nowhere is it indicated that these things will be provided.)

In short, this report offers nothing except more criminalization for the unhoused residents already suffering the indignity of homelessness. With the meager addition of 20 outdoor sites with the minimal infrastructure that it promises, it strips unhoused people of the little security that they have found over the last many months, without even the dignity of consultation. If passed, this process will no doubt lead to unhoused people being forced to downgrade their current accommodations out of fear. It reads as nothing more than a formal procedure before removing unhoused people – and encouraging them to remove themselves – from sight.

⁵ Page 9 "Homelessness and Encampment Approach" May 3, 2022

⁶ Page 7. "Homelessness and Encampment Approach" May 3, 2022