



**Report**  
**Staff Report**  
**The Corporation of the City of Brampton**  
**10/23/2024**

**Date:** 2024-10-09

**Subject:** Safe Public Spaces for All: Addressing Encampments in the City of Brampton (RM 55/2024)

**Contact:** Razmin Said, Senior Manager, Community Safety & Well-Being Office

**Report number:** Community Services-2024-826

**RECOMMENDATIONS:**

1. That the report from Julia Seeratan, Advisor, Community Safety and Well-Being Office, to the Committee of Council Meeting of October 23, 2024, re: **Safe Public Spaces for All: Addressing Encampments in the City of Brampton (RM 55/2024)**, be received;
2. That the Brampton Encampment Planning Working Group examine by-laws identified by Enforcement and By-Law Services that fall under the umbrella of 'safe public spaces for all' to determine:
  - i. how they can be strengthened to ensure public spaces are safe for all users in the city, and;
  - ii. which will need updating for the Encampment Policy Framework and Joint Protocols for Peel Region and its Local Municipalities;
3. That this report be forwarded to Regional Council, Regional staff, and the Peel Encampment Working Group and Steering Committee for consideration in the development and implementation of the Encampment Policy Framework and Joint Protocols for Peel Region and its Local Municipalities;
4. That staff increase advocacy efforts by supporting the Solve the Crisis campaign and a letter be sent to the Federal Government and Provincial Government, relevant cabinet members, and local MPs and MPPs asking to appoint a single ministry and minister to lead the Province's response to homelessness and mental health issues and to create a municipal-provincial task force to immediately direct resources and supports to cities and establish a common framework that includes operational guidelines for municipalities; and
5. That the 2025 Community Services capital budget submission include the cost of a dedicated multi-disciplinary unit focused on risk intervention and response with the subject matter expertise needed to assess and address encampment hazards, provide interventions, and respond to encampment concerns, with an estimated annual budget of \$907,000 and presented to the Mayor for his consideration.

**OVERVIEW:**

- **The City of Brampton is collaboratively working with the Region of Peel and community partners to address the growing number of encampments and the need to ensure safety for all. This includes collaborating on the development of the Encampment Policy Framework and Joint Protocols for Peel Region and its Local Municipalities.**
- **Several internal improvements to address gaps and streamline existing processes were made in 2024; however, there is still additional work needed.**
- **A review and update of the by-laws identified in this report will ensure a balanced approach to addressing safety in public spaces for all Brampton residents.**
- **Sustaining the current level of response will require investment in resources and the addition of a dedicated unit. As part of the 2025 Community Services Capital Budget submission, staff will include \$907,000 of budget asks for the dedicated multi-disciplinary unit for the Mayor’s consideration.**

**BACKGROUND:**

This Council Report relates to a motion from the July 10, 2024 Committee of Council meeting, RM 55/2024 and Resolution C149-2024 Clause 8, directing staff to report on “gaps and further improvements to the City of Brampton’s internal processes in addressing encampments on City property, and any recommendations that improve the City’s coordination with Region of Peel, Peel Police and local Social Agencies, before the Region of Peel’s final draft of the encampment protocol/policy to Regional Council.”

The Office of the Federal Housing Advocate uses the term “encampments” to refer to emergency accommodations [such as tents and informal structures] established by people who are unhoused, usually on public property or privately-owned land, and often without permission<sup>1</sup>. Encampment residents are a small portion of unhoused people but represent a visible form of homelessness.

The largest concentration of encampments in Brampton started to emerge along a 2 km stretch of the Etobicoke Creek Trail (ECT) between Church Street and Williams Parkway in Spring 2023. Traditional response interventions to address these encampments were not sufficient. This led to the development and implementation of an interim procedure to secure overflow motel spaces through the Region of Peel before issuing Trespass to Property Act (TPA) notices. Despite enforcement related challenges, the interim procedure successfully transitioned encampments along the ECT from twenty-five to one.

<sup>1</sup> The Office of the Federal Housing Advocate, 2024. *Upholding dignity and human rights: the Federal Housing Advocate’s review of homeless encampments – Final report*. Ottawa: The Office of the Federal Housing Advocate.

### **CURRENT SITUATION:**

This work requires coordination across multiple divisions, levels of government and service providers, there is a need for constant coordination and communication. The growing number of encampments has dictated an elevated response from all partners. As of October 9, 2024, there are 21 active encampments across the city (4 along the ECT).

### **The Brampton Encampment Response Group**

The City of Brampton recognized the need for increased information sharing and a coordinated approach between key internal and external partners to identify and address encampment related needs and hazards for all encampments in Brampton. The Community Safety & Well-Being Office (CSWO) established the Brampton Encampment Response Group on May 1, 2024, and meets weekly to review all known encampments, address needs and potential hazards, and coordinate solutions. Below is a list of partners in this group:

#### *Internal Partners:*

- Animal Services
- Community Safety and Well-Being
- Enforcement and By-Law Services
- Fire and Emergency Services
- Parks Maintenance & Forestry
- Security Services
- Service Brampton
- Strategic Communications
- Welcoming Streets

#### *External Partners:*

- Peel Regional Police
- Region of Peel's Housing Services
- Region of Peel's Outreach Services

### **Development and Implementation of the Encampment Policy Framework and Joint Protocols for Peel Region and its Local Municipalities**

Although encampments in Brampton are located on City property, the Region of Peel, as the Service Manager, leads the Peel Encampment Working Group and Steering Committee ([see Attachment 1](#)). These groups are developing the Encampment Policy Framework and Joint Protocols for Peel Region and its Local Municipalities (Encampment Policy and Joint Protocols), which will be presented to Regional Council in early 2025 for approval and implemented later that year. Prior to implementation, the City of Brampton continues its collaborative work with the Region and below is a compilation of areas to focus on through the development process.

*Through the Peel Encampment Working Group and Steering Committee, City staff will advocate for the following considerations for development and inclusion in the Encampment Policy and Joint Protocols:*

- Include actions and cost to address regular waste and sharps disposals at encampment sites.

- Examine the benefits of having Peel Outreach Services at encampment cleanup events and occasions when TPA notices are issued. Include a time frame and process for joint efforts needing coordination.
- Examine and include strategies to address non-compliance of TPA notices, a time frame for site conferences, and the benefits of Peel Regional Police (PRP) attending site conferences that involve non-compliance of TPA notices.
- Examine and include ways to mitigate fire risks caused by cooking at encampments and warming/heating during the cold seasons.
- Include an extreme weather (such as flood warnings) response for encampment residents.
- Include guidance on engaging encampment residents from Indigenous, racialized, and equity deserving groups.
- Include a review of the Region's affordable housing, supportive housing, and shelter supports to ensure there are safe, low-barrier, accessible, and suitable options.

*Through the Peel Encampment Working Group and Steering Committee, City staff will advocate for the following considerations for implementation when launching the Encampment Policy and Joint Protocols:*

- Workshops and information sessions that include a step-by-step breakdown of action items, timelines, and a Question-and-Answer session to ensure city staff understand roles and expectations.
- Training for city staff involved in encampment work. This may include training related to information and privacy, trauma-informed, de-escalation, and mental health and addictions.
- Disclosure of any new federal/provincial funding related to homelessness and encampments, and discussion through the Peel Encampment Working Group on resourcing required to implement the Encampment Policy and Joint Protocols.
- Public information about encampments to be shared including jurisdictional responsibilities, the protocol and process for responding to encampments, and a point of contact at the Region of Peel to answer resident inquiries.

### **Gaps and Improvements in Addressing Encampments in the City of Brampton**

Through the Brampton Encampment Planning Working Group, gaps and their respective improvements have been identified.

#### **1. Gap: Information Sharing and Collaboration**

In 2024, multiple teams identified the need for additional, consistent, more frequent information sharing, and the ability to access or update information onsite.

Information sharing and coordination between partners is restricted due to various privacy protections in place; Government organizations and child and family service providers that collect personal information must follow the rules set out in the [Freedom of Information and Protection of Privacy Act \(FIPPA\)](#), the [Municipal Freedom of Information and Protection of Privacy Act \(MFIPPA\)](#) and [Part X of the Child, Youth and Family Services Act \(CYFSA\)](#). Peel Housing Services and the Canadian Mental Health Association are considered Health Information Custodians

and have additional privacy requirements from the [Personal Health Information Protection Act \(PHIPA\)](#) that need to be followed in any communication or reporting.

- a) *Improvement: Consistent Information Sharing (implemented and ongoing)*  
In May 2024, CSWO led a collaborative enhancement of a Brampton Fire and Emergency Services (BFES) database to streamline coordination. CSWO initiated the Brampton Encampment Response Group that meets weekly to coordinate responses.
- b) *Improvement: Multi-Sector Collaboration (implemented and ongoing)*  
Collaborative groups were created to coordinate encampment efforts and include: the Peel Encampment Working Group and Steering Committee, the Brampton Encampment Response Group, and the Brampton Encampment Planning Working Group. Implementing Site Conferencing practices has increased collaboration and coordination between CSWO and Security Services with Peel Outreach and the Region of Peel Housing Services.
- c) *Improvement: Protection of Privacy Training (required)*  
Enhanced training for City staff is required to gain a stronger understanding of the privacy restrictions and documentation best practices of external partners. The Peel Encampment Working Group is beginning to draft a privacy protocol to ensure compliance with relevant privacy legislation while also providing information to encampment response partners.
- d) *Improvement: Mobile Access to Information (required)*  
CSWO is working with the Digital Innovation team to create a streamlined process for information sharing. This will enable partners to communicate and share information efficiently. Recommended documentation tools should be identified through the Encampment Policy and Joint Protocols.

## **2. Gap: Identifying and Locating Encampment Sites**

Identifying and locating encampments without using personal identifiable information is challenging. Encampment residents are often transient, move frequently, have multiple tents/sites, and may be in unsafe terrains.

- a) *Improvement: Security Data Sheets (implemented and ongoing)*  
Security Services created new internal processes to identify and locate sites.
- b) *Improvement: Interactive GIS Mapping Application (required)*  
An interactive Geographic Information System (GIS) application is in development to enable partners to better locate encampments.

## **3. Gap: Assessing Risk and Priority**

Currently, there are varying methods to determine risk levels of encampment sites or coordinated processes to determine priority.

a) *Improvement: Assessment Tools (implemented and ongoing)*

The Peel Encampment Working Group has developed a draft encampment site assessment tool to identify health and safety needs and prioritize actions. This group also developed an Identification Template and a Needs Assessment tool. These assessments consider criteria pertaining to safety, health, interference, site compliance, client needs, social support, and connections. The results of these tools will assess site risks and determine mitigation strategies, interventions, and priority levels.

b) *Improvement: Training and use of Assessment Tools (required)*

City staff will require training on how to use the newly developed assessment tools. Methods and frequency of training and approaches should be identified through the Encampment Policy and Joint Protocols.

**4. Gap: Continuous Monitoring and TPA Notices**

Following the Spring 2024 interventions at the ECT there is a need to continuously monitor the area to deter encampments. There are also limitations to Security Services enforcing TPA notices without PRP's assistance.

a) *Improvement: Increased Security in Trespass Area (implemented and ongoing)*

To prohibit and deter new encampments in the trespass area, Security Services contracts 24-hour security patrols. These patrols monitor the trespass area every 30 minutes.

b) *Improvement: Guidance for Enforcement of TPA Notices (required)*

Through the Peel Encampment Working Group, the City will advocate that the Encampment Policy and Joint Protocols provide guidance on how PRP, Peel Outreach, and other relevant partners can participate in site conferences involving cases of non-compliant TPA notices and ways for partners to support the removal or relocation of high-priority encampment sites.

**5. Gap: Enforcing and Strengthening By-Laws and Trespass to Property Act Notices**

To encourage compliance with Parklands By-law 161-83, the City put up signage along the ECT, referencing no loitering and no camping overnight. The new signage is in accordance with the [Trespass to Property Act](#).

a) *Improvement: Review Existing By-Laws and Identify Opportunities for Enhancements (required)*

Collaborative work with Enforcement & By-Law Services is required to review the By-laws listed below and identify opportunities to strengthen them, ensuring safe public spaces for all users.

- [Boulevard Maintenance and Highway Obstruction By-law 163-2013](#)
- [Open Fires By-law 91-94](#)
- [Parklands By-law 161-83](#)
- [Public Nuisance By-law 136-2018](#)
- [Refuse and Dumping By-law 381-2005](#)

- [Property Standards By-law 165-2022](#)
- [Traffic By-law 93-93](#)

*b) Improvement: Increase Collaboration with PRP for Enforcement of TPA Notices (required)*

Direction through the Encampment Policy and Joint Protocols for an outlined procedure from PRP to support the removal or relocation of high priority encampment sites is needed to move this work forward and strengthen the City of Brampton's efforts when a TPA notice is issued. This is also needed to strengthen the City's ability to enforce its by-laws.

**6. Gap: Litter and Hazards**

Residents who live near encampments have expressed concerns that litter and debris accumulate quickly, because there is no regular waste collection at encampment sites. Hazards at encampment sites may include fire accelerants and combustibles, sharps, illicit drugs and paraphernalia, weapons, biohazards, poisonous plants, insects (ticks), trip hazards, and hostile individuals.

*a) Improvement: Restoration and Cleanup Activities (implemented and ongoing)*

Four large-scale restoration cleanup events took place along the ECT in winter/spring, 2024. Litter, unauthorized structures, hazardous items, and debris were removed to restore the area as a healthy and safe public space for all. 34 20-cubic yard bins of garbage and debris and 40 propane cylinders were removed. In late summer 2024, a cleanup around all encampment sites on city-owned property yielded litter, debris, and garbage collected into 14 20-cubic yard bins, and the collection of various safety hazards including propane tanks, lawnmowers, and sharps. Staff continue to monitor high risk areas and cleanup sites as required.

*b) Improvement: Streamlining Requests through Service Brampton (implemented and ongoing)*

Collaborative work by the Brampton Encampment Response Group identified the need to remove litter, debris, and hazardous items from encampment sites regularly. A new process to distinguish and streamline litter cleanups and inactive site cleanups solely through Service Brampton has improved response times.

*c) Improvement: Updating Job Hazard Analysis (required)*

Parks Maintenance & Forestry is updating its Job Hazard Analysis (JHA) to outline how staff respond to encampment cleanups and debris removal requests. Updates to the JHA include direction to request a security escort, a site inspection checklist upon arrival to look for hazards and an updated protocol for the safe removal and disposal of hazardous waste (chemical, biohazards) to the Region of Peel's Community Recycling Centres. Security Services plans to update its JHA.

**7. Gap: Staffing**

City of Brampton divisions shifted workplans and project timelines, reassigned staff and hired contractors to accommodate the work required to address encampments.

Operational teams recognize the need to visit encampments more frequently but lack staffing capacity. Dedicated resources will also be required to implement the new Encampment Policy and Joint Protocols, once approved.

*a) Improvement: Staffing Response (implemented and ongoing)*

Various divisions adjusted staffing levels to address encampment workloads.

- BFES increased staffing from one to three staff, from two divisions, to support this work and aim to do weekly fire inspections.
- CSWO assigned four staff resources to address encampments and work plans were restructured and delayed to accommodate the growing need to coordinate encampment responses.
- Parks Maintenance & Forestry contracted an external service provider to manage the increasing demand for encampment cleanups.
- Security Services uses an external contractor to monitor the trespass area. It also requires a dedicated Operations Coordinator to oversee its encampment response which includes planning, daily tasks, and data collection.
- The Welcoming Streets pilot program expanded from the downtown core to near the trespass area to assist businesses in need of non-police interventions and connect individuals who are at-risk to wraparound services.

*b) Improvement: Budget Request (required)*

Through the 2025 budget process, CSWO requests a dedicated multi-disciplinary unit with the expertise needed to meet the current level of service and prepare for the implementation of the Encampment Policy and Joint Protocols. As part of the 2025 Community Services Capital Budget submission, staff will include \$907,000 of budget asks for the dedicated multi-disciplinary unit and required resources and tools.

**8. Gap: Communication with Impacted Residents, Businesses, and Concerned Stakeholders**

The presence of encampments across the city has elicited diverse reactions from residents, businesses, and community stakeholders in surrounding areas. Concerns and calls for increased support for encampment residents to heightened anxiety about community safety, including fears of property theft, drug trafficking, and the risk of localized fires in parks. This mix of perspectives has highlighted the need for effective communication and transparency to address misconceptions, mitigate fear, and build community understanding of the City's approach to managing these complex issues.

*a) Improvement: Proactive Weekly Communication with Impacted Residents, Businesses, and Concerned Stakeholders (implemented and ongoing)*

In response, and in collaboration with local Councillors, CSWO launched proactive weekly email updates to residents, businesses, and other concerned stakeholders. These updates provide timely information on the City's actions, progress, and ongoing strategies to support encampment residents while ensuring community safety. Through the Peel Encampment Working Group,



partners are working on additional initiatives to streamline information updates across Peel.

### 9. **Gap: Lack of Legislative Direction**

Municipalities like the City of Brampton face significant challenges in addressing homelessness and managing encampments due to limited resources, legislation and the lack of federal or provincial direction in the form of an encampment response plan. Inconsistent court rulings related to the removal of encampments by municipalities has contributed to the lack of clear direction for municipalities that need to respond to growing health and safety concerns. These constraints create gaps in the policy framework, making it difficult for local governments to balance enforcement with the provision of necessary services and supports. ([See Attachment 2](#))

- **Federal Legislation:** The National Housing Strategy Act (2019) established the right to adequate housing as law. This places responsibility on municipalities to ensure shelter availability before taking action against individuals residing in encampments on public property. Municipalities are often caught between adhering to local by-laws and respecting federal obligations, leading to uncertainty and legal challenges. For example, in Brampton, Temporary Public Policy for Visa Processing changes in 2023 caused a surge in asylum claimants, who represented 71% of the total shelter population in Peel Region that year, compared to a historical average of 4-5%.<sup>2</sup> This influx has created significant pressure on the local shelter system, which is not equipped to handle such numbers without clear federal guidance.

Moreover, the Federal Housing Advocate's report on encampments released in February 2024 called for the establishment of a National Encampment Response Plan. However, no such plan or framework has been developed, leaving municipalities like Brampton without a consistent federal policy to address encampments. The lack of a coordinated response exacerbates the burden on local resources and limits Brampton's ability to provide humane solutions while enforcing by-laws. One of the Calls to Action in the Federal Housing Advocate's report is to offer people permanent housing options as rapidly as possible. This includes building more community housing and subsidizing housing. Portable subsidies are paid by the Region of Peel to low-income households to assist with housing costs and can be used to pay rent anywhere in the region.

#### **Region of Peel Costs per Bed**

<b>Type of Accommodation</b>	<b>Average Annual Cost per Bed</b>
Regional Shelter	\$33,480
Overflow Hotel	\$52,080
Portable Subsidy*	\$16,800
Community Housing Subsidy*	\$15,336

\*Average annual cost per person. Source: Region of Peel

<sup>2</sup> Jacques, Steve. *Peel's Asylum Claimant Response*. Presented to the Region of Peel Diversity, Equity, and Anti-Racism Committee, October 3, 2024. Accessed October 8, 2024. <https://pub-peelregion.escrībemeetings.com/filestream.ashx?DocumentId=35146>

Provincial Legislation: The role of law enforcement in managing encampments varies depending on the legal context. Under the Ontario Use of Force Model, PRP base their interactions with encampment residents on the perceived level of threat, focusing on de-escalation and connecting residents to support services. This approach changes significantly when encampments are on private property, requiring an escalated response due to trespassing laws. Yet, PRP must operate within municipal by-laws and balance enforcement with compassion, often in the absence of clear provincial direction.

The Mental Health Act is another area where limitations impact municipal capacity to address homelessness. It is estimated that 30-35% of people experiencing homelessness and up to 75% of women experiencing homelessness in Brampton struggle with mental illness<sup>3</sup>. Addressing these issues requires a multi-sectoral approach involving health, housing, and social services. Peel Outreach Services, funded and overseen by the Region of Peel and operated by the Canadian Mental Health Association (CMHA), serves as the primary connector to appropriate services. However, privacy-related legislation like the Personal Health Information Protection Act (PHIPA) restricts information sharing among agencies, complicating efforts to provide coordinated care for encampment residents with complex needs.

The Association of Municipalities of Ontario (AMO) has called on the province to establish a Homeless Encampment Guidance Framework to standardize responses across municipalities. Without such a framework, municipalities are left navigating inconsistent court rulings and fragmented policies, further complicating their ability to address encampments in a legally sound and humane manner.

*a) Improvement: Advocacy (implemented and ongoing)*

The City of Brampton is actively advocating for stronger legislative frameworks at both the federal and provincial levels to address the complex challenges of homelessness, encampments, and the need for adequate mental health and addiction supports. To tackle these issues effectively, the City recommends the following actions:

- Federal Government: Expedite the development of a National Encampment Response Plan that provides municipalities with clear directives and support mechanisms to better manage encampments, address mental health and addiction issues, and expand the availability of deeply affordable housing.
- Provincial Government: Establish a consistent policy framework that aligns enforcement measures with comprehensive support services. This will ensure municipalities have the legal clarity and resources needed to effectively

---

<sup>3</sup> Association of Municipalities of Ontario, July 2, 2024. *Homeless Encampments in Ontario: A Municipal Perspective*. Toronto: Association of Municipalities of Ontario.  
[https://www.amo.on.ca/sites/default/files/assets/DOCUMENTS/Homelessness/2024/AMO\\_Homeless-Encampments-in-Ontario\\_2024-07-02.pdf](https://www.amo.on.ca/sites/default/files/assets/DOCUMENTS/Homelessness/2024/AMO_Homeless-Encampments-in-Ontario_2024-07-02.pdf)

respond while respecting human rights and promoting equitable access to housing and social services.

The City of Brampton, alongside the Region of Peel and other municipalities, has passed several motions to advocate for increased funding and resources to address these pressing issues. The City's efforts are aligned with broader national and provincial advocacy initiatives. The Federation of Canadian Municipalities (FCM) is urging the federal government to collaborate with provinces and municipalities to develop a comprehensive plan aimed at ending chronic homelessness.

At the provincial level, the Ontario Big City Mayors (OBCM) launched the "Solve the Crisis" initiative, calling on the provincial government to designate a single ministry and minister to lead the response to homelessness and mental health issues. This initiative also advocates for the creation of a municipal-provincial task force that would rapidly allocate resources and supports to cities facing these challenges.

Through these advocacy efforts, the City of Brampton seeks to ensure that all residents have access to safe and stable housing while equipping municipalities with the necessary tools, funding, and policy frameworks to effectively reduce homelessness and improve quality of life.

## **CORPORATE IMPLICATIONS:**

### **Financial Implications**

There are no immediate financial impacts from the adoption of the recommendations in this report. As part of the 2025 Community Services Capital Budget submission, staff will include \$907,000 of budget asks for a dedicated multi-disciplinary unit and funds for supplies, contractors, and signs, for the Mayor's consideration.

### **Legal Implications**

There are no legal implications in relation to the recommendations in this report. Legal Services will continue to be involved in the discussions to protect the City's interests.

### **Communications Implications**

Provided Recommendation #4 of this report is adopted, there will be a need for communications planning to support increased advocacy. CSWO staff will continue working with Strategic Communications, as required.

## **STRATEGIC FOCUS AREA:**

This report aligns with Brampton's Corporate Strategic Focus Area of Health & Well-being and relates to Brampton's approach to achieve advancements in poverty, safety, health, physical and mental wellness.

**CONCLUSION:**

A coordinated response among partners is required to address encampments. The implementation of the Encampment Policy and Joint Protocols will provide consistency in assessing encampment sites and determining interventions. Interim solutions implemented help address concerns; however, sustainable and long-term solutions require increased funding and support from higher levels of governments.

Authored by:

Reviewed by:

---

Julia Seeratan  
Community Safety Advisor  
Community Safety & Well-Being  
Office

---

Razmin Said  
Senior Manager, Community Safety &  
Well-Being Office  
Community Safety & Well-Being Office

Approved by:

Approved by:

---

Bill Boyes  
Commissioner  
Community Services

---

Marlon Kallideen  
Chief Administrative Officer  
Office of the CAO

**Attachments:**

- [Attachment 1 – Jurisdictional Responsibilities Associated with Encampments](#)
- [Attachment 2 – Relevant Ontario Court Rulings](#)