Written Submission

on Ontario's New Five-Year Poverty Reduction Strategy to the Minister of Children, Community and Social Services

Hon. Michael Parsa

November 28, 2025

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Recommendations

Income Security

A. Make Social Assistance a Real Pathway Out of Poverty

Recommendation 1: Index Ontario Works (OW) to inflation and significantly increase both OW and Ontario Disability Support Program (ODSP) rates, so they rise above the poverty line with a binding commitment to cut the OW/ODSP poverty gap by at least 50% by 2030.

Recommendation 2: Eliminate punitive clawbacks and inadequate post-earnings exemptions by (i) raising the OW earnings exemption to at least \$1,000 per month; reducing the ODSP clawback on earnings above the exemption to 50%; and extending the \$1,000 exemption to non-disabled spouses; and (ii) ending dollar-for-dollar deductions of federal benefits, including EI and CPP-D, from OW and ODSP.

B. Ensure social assistance modernization strengthens client stability and equitable access to supports.

Recommendation 3: (i) Fully proclaim and fund life-stabilization services and (ii) reform Integrated Employment Services to prioritize client needs by ensuring equitable access; strengthening coordination between ministries and service providers; and preventing vulnerable recipients from being pushed into work before they are ready.

C. Strengthen Wages and Worker Protections to Build a Poverty-Proof Economy

Recommendation 4: Immediately raise the minimum wage to \$20 per hour, with annual increases indexed to inflation.

Recommendation 5: Amend the *Employment Standards Act, 2000* to include 10 employer-provided paid sick days annually, with an additional 14 paid days during declared public health emergencies.

Affordable and Secure Housing

A. Prioritize investment in affordable housing

Recommendation 1: Invest in the development and acquisition of social housing and non-profit housing.

Recommendation 2: Ensure surplus land is preserved and only provided to non-profit and/or public housing projects.

B. Set clear and measurable targets and invest resources needed to end chronic homelessness

Recommendation 3: Make significant, long-term investments to end chronic homelessness and provide housing solutions as viable alternatives to encampments.

Recommendation 4: Develop clear, measurable goals and targets to end chronic homelessness.

Recommendation 5: Develop a provincial encampment protocol to ensure that human rights are upheld.

C. Implement full rent control and improve security of tenure for tenants

Recommendation 6: Repeal Section 113 (*Vacancy Decontrol*) of the Residential Tenancias Act, 2006 and Sections 6.1 (2), 6.1 (3), 6.1 (4), 6.1 (7) (2018 Exemption) of the Residential Tenancies Act, 2006.

Background:

Ontario's current Poverty Reduction Strategy, *Building a Strong Foundation for Success: Reducing Poverty in Ontario (2020–2025*), is nearing its end without having delivered meaningful or lasting reductions in poverty. Despite its stated ambition, the strategy has been undermined by a narrow, almost singular focus on employment activation and labour-market integration that has left the core drivers of poverty unaddressed: inadequate social assistance rates, punitive welfare rules, wages that no longer cover basic needs, and critically, an unprecedented housing and homelessness emergency that now touches every community in Ontario.

The human toll of this failure is unmistakable. At least 81,515 Ontarians experienced homelessness in 2024. The increase has been particularly pronounced in smaller communities. 5,377 individuals experienced homelessness within Northern Ontario communities, an increase of 70% over the last 5 years and over 200% since 2016. In the past year alone, Ontario food banks recorded 7.7 million client visits, a staggering 77% increase from 2022ⁱⁱ. In Toronto, the province's largest city, food-bank visits reached an all-time high of 3.42 million, representing a 125% surge in just two yearsⁱⁱⁱ. At the same time, child poverty in Ontario rose by 3.5 percentage points between 2021 and 2022^{iv}, the largest single-year increase ever recorded and the sharpest provincial jump in the country, pushing more than 100,000 additional children below the poverty line.

With the current strategy expiring, Ontario has a critical opportunity and obligation to adopt a new approach that puts poverty reduction at its core. A successful strategy must confront the structural drivers pushing more Ontarians into precarity: stagnant social assistance rates, punitive benefit clawbacks, a fractured and inadequately funded support system, insufficient protections for workers, and a housing system that no longer provides affordable or secure homes for low- and moderate-income residents.

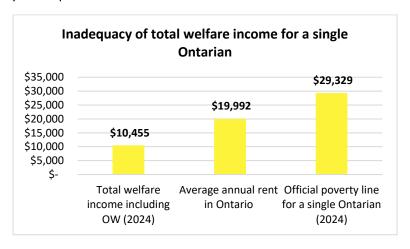
Against this backdrop, the following recommendations outline the core policy actions required to move Ontario toward a future where all residents can live with dignity, stability, and real opportunity.

Income Security

A. Make Social Assistance a Real Pathway Out of Poverty

Ontario Works and Ontario Disability Support Program:

A meaningful poverty reduction effort begins by recognizing the social safety net's essential role in reducing poverty, homelessness and food insecurity. Yet Ontario's social safety net, primarily OW and ODSP, remains sorely inadequate.



Source: ISAC calculations based on Maytree dataviii.

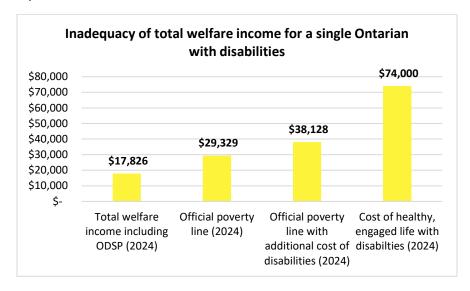
OW rates for single employable adults, who constituted 30% of the individual social assistance cases as of June 2025^{ix}, have remained frozen at \$733 per month since 2018, even as the cost of essential goods and services rose by more than 23 per cent over the same period^x. The basic needs allowance of \$343 and shelter allowance of \$390 make self-sufficiency impossible; even doubling the total rate would leave a single recipient short of the average monthly rent of \$1,666 in the province^{xi}. In 2024, a single adult on Ontario Works had an annual income that was \$18,874 below Canada's Official Poverty Line (the Market Basket Measure). Ontario is the only province that has not increased social assistance rates for single individuals since 2018^{xii}.

Increasing OW rates would have a crucial and immediate impact on reducing poverty and vulnerability for the almost half a million Ontarians who rely on OW for income^{xiii}. OW is often a stopgap for women with children escaping domestic violence, the only option for teens leaving abusive homes, and the sole resort for low-wage workers who are injured on the job with no access to other benefits and income supports. Raising OW would also provide much-needed income to address food insecurity, as OW recipients account for one-fifth of food bank users in Toronto^{xiv}.

An ISAC survey on social assistance found that despite a strong desire to work and be independent, two out of three respondents who receive OW had a health or disability-related barrier that prevented them from obtaining employment. However, the onerous process of accessing ODSP often forces clients to remain on OW.

With regard to ODSP rates, the introduction of ODSP rate indexation to inflation in 2022 was a welcome and overdue step forward. The 2.8% inflation adjustment in July 2025 raised the monthly rate for a single

recipient by \$40 to \$1,408. However, a recent ISAC survey of 200 social assistance recipients found that 2 out of 3 ODSP recipients reported no noticeable improvement to their ability to battle unaffordability despite the \$60 inflation-related increase in 2024. This is because the adjustment merely keeps pace with rising costs and does not address the program's deep structural shortfall, where base rates remain far below the poverty line.



Source: ISAC calculations based on Maytree dataxv

The gap between total welfare income for a person with disabilities and the Official Poverty Line (Market Basket Measure, (MBM)) stood at \$11,503 in 2024^{xvi}. The MBM excludes extra disability-related costs, such as caregiving, assistive devices, and uninsured prescriptions, underestimating poverty rates for persons with disabilities. For individuals with moderate disabilities, these added costs can raise living expenses by 30%^{xviii}, widening the true income shortfall relative to the MBM to \$20,301. This gap widens further when factoring in the \$74,000–\$116,000 annual cost of a healthy, engaged life for people with disabilities in parts of Ontario^{xviii}. Current social assistance income rates offer neither a safety net nor the income adequacy needed to create a pathway out of poverty.

These gaps are the result of policy choices. The next Poverty Reduction Strategy must commit to bold, measurable progress: reducing the OW and ODSP poverty gap by at least 50% by 2030, as measured against the MBM. Achieving this target would require immediate and sustained rate increases, coupled with permanent, annual indexation to inflation. Investing in closing the poverty gap, even by half, could reduce annual downstream costs related to poverty in Ontario by a conservative \$33 billion^{xix} and would dramatically cut food-bank reliance, shelter use, and preventable health crises, while restoring dignity to hundreds of thousands of Ontarians.

• **Recommendation 1:** Social assistance rates must reflect the actual cost of living. Index Ontario Works to inflation and significantly increase both OW and ODSP rates so that they rise above the poverty line, with a binding provincial commitment to reduce the OW and ODSP poverty gap by at least 50% by 2030.

End Oppressive Clawbacks:

For employment to effectively lift people out of poverty, the system must facilitate a smooth transition from social assistance to sustainable work. Unfortunately, Ontario's current social assistance system undermines this by imposing steep clawbacks on earnings and federal income supports. These mechanisms trap individuals in deep poverty, discourage labour-force participation, and undermine poverty reduction goals by making it financially risky to maintain or increase employment.

For OW recipients, the earnings exemption remains frozen at \$200 per month, a threshold unchanged since 2013, after which a 50 per cent deduction applies to every additional dollar earned^{xx}. At the current minimum wage of \$17.60 per hour, recipients begin losing 50% of their earnings after just 11.2 hours of work per month and lose their Ontario Works benefit entirely after approximately 24 hours of work per month^{xxi}. As a result, people are often forced to weigh the value of taking on precarious, low-wage jobs against the potential loss of essential supports such as health benefits, prescription drug coverage, and other vital services.

For ODSP, while the earned income exemption for the primary recipient was raised to \$1,000 in 2023, the clawback rate above that threshold jumped from 50 to 75 per cent, and the earnings exemption for non-disabled spouses remains capped at a mere \$200 monthly. This family-level penalty drags entire households into deeper poverty, even when one partner secures full-time work, contradicting the program's intent to support shared financial responsibility.

Equally damaging are the dollar-for-dollar clawbacks on federal income supports, such as Employment Insurance (EI) and Canada Pension Plan Disability (CPP-D) benefits. These deductions treat external federal support as a substitute for provincial responsibility. This effectively reduces social assistance and leaves recipients no better off, despite qualifying for federal programs designed to provide additional security during periods of unemployment, injury, or disability.

- Recommendation 2: Eliminate poverty traps created by punitive clawbacks and low earnings exemptions by
 - Raising the earnings exemption for Ontario Works to at least \$1,000 per month. For ODSP, lower the clawback rate above the \$1,000 exemption to 50% (from 75%) and extend the same \$1,000 exemption to non-disabled spouses.
 - Ending dollar-for-dollar deductions of federal benefits (including EI and CPP-D) from provincial social assistance payments, ensuring that employment and federal supports result in a net financial gain and a genuine pathway out of poverty.

B. Ensure social assistance modernization strengthens client stability and equitable access to supports.

Social Assistance Modernization:

Ontario's last poverty reduction strategy prioritized modernizing social assistance to connect Ontarians with the right supports, services, and employment. Yet, the province's approach to "modernization" has largely prioritized administrative restructuring and privatized employment services over the foundational elements that help people meet basic needs and overcome structural barriers to employment.

The province's ongoing reforms, encompassing Social Assistance Renewal (SAR) under the Ministry of Children, Community and Social Services (MCCSS) and Integrated Employment Services (IES) under the Ministry of Labour, Immigration, Training and Skills Development (MLITSD), risk exacerbating poverty without creating safeguards for vulnerable people who, with the right support, might be able to work.

SAR centralized eligibility and financial administration at MCCSS while shifting casework and "life stabilization" supports (e.g., housing, mental health, addiction counselling, and domestic violence services) to municipalities and District Social Services Administration Boards (DSSABs). However, key legislative sections in Schedule 21 of the *Supporting Recovery and Competitiveness Act, 2021* (ss. 1–3, 17, 18(1), 18(2), and 22) remain unproclaimed.

Leaving these sections unproclaimed creates a fragmented system where municipalities are expected to deliver the crucial life stabilization services for the well-being of the recipients without transparency on municipal/DSSAB capacity or adequate intergovernmental funding. As a result, vulnerable recipients risk being forced into the labour market prematurely, which can leave vulnerable clients worse off.

On the employment front, IES contracted services to private Service System Managers (SSMs) via a performance-based funding model that incentivizes placements and retention. Evidence shows^{xxii} xxiiithat the system is failing to meet the needs of social assistance recipients and, in many cases, is creating new barriers to stability and employment.

The performance-based, privatized model incentivizes quick job placements over meaningful, sustained support. As a result, SSMs tend to deprioritize clients with complex barriers, including persons with disabilities, newcomers, and those with health or caregiving challenges^{xxiv}, ^{xxv}, ^{xxvi}. At the same time, there has been a marked decline in social assistance recipients referred from MCCSS to the IES system, widening the gaps between OW and ODSP referrals and actual intakes, alongside declining employment outcomes at the 12-month checkpoints^{xxviii}. The system's administrative burdens, such as lengthy, invasive assessments, rigid streaming through the Common Assessment Tool, and extensive documentation requirements, consume staff time and discourage client participation^{xxviii}, ^{xxix}. Together, these structural flaws have contributed to the Ontario government falling well short of its annual PRS target of moving 60,000 social assistance recipients into employment, meeting only about half (34,994 recipients) of its target in 2024^{xxx}.

Recommendation 3: i) Fully proclaim and fund life-stabilization services and ii) reform Integrated
Employment Services to prioritize client needs over performance metrics by ensuring equitable
access, improving coordination between Ministries and service providers, and ensuring no one is
pushed into work before they are ready.

C. Strengthen Wages and Worker Protections to Build a Poverty-Proof Economy

Minimum Wage:

For employment to meaningfully lift Ontarians out of poverty, wages must be sufficient to cover basic needs. Ontario's current minimum wage of \$17.60 falls far short of this standard. In the Greater Toronto Area, the "living wage" (the amount needed to cover basic expenses and participate fully in the community), is now \$27.20 per hour, more than 50 per cent higher than the provincial minimum wage^{xxxi}.

In 2025, the Greater Toronto Area living wage rose 4.6% year-over-year driven largely by runaway housing costs, far outpacing the 2.8% CPI-based increase to Ontario's minimum wage. The gap is stark: in Toronto, it now takes more than two full-time minimum-wage jobs to afford the average one-bedroom rent; in Ottawa, 1.7 full-time minimum-wage jobs are required for the same xxxiii. Comparable affordability crises exist in Barrie, Hamilton and Oshawa and communities across the province.

Evidence shows that raising the minimum wage reduces wage inequality, particularly for women and racialized workers^{xxxiv}, while also reducing poverty-related public service costs (such as healthcare and social assistance) and enhancing local spending, lowering employee turnover, and increasing tax revenues^{xxxv}. In Ontario, when the minimum wage increased from \$11.60 to \$14 in 2018, Ontario's unemployment rate dropped to the lowest level since 2000, and the economy added 78,000 full-time jobs^{xxxvi}. Increasing the minimum wage is also a proven food insecurity intervention: every one-dollar increase reduces household food insecurity by approximately five per cent^{xxxvii}.

Recommendation 4: Immediately raise the minimum wage to \$20 per hour, with annual increases
indexed to inflation. This is a necessary step toward closing the gap with regional living wage rates,
reducing poverty, and supporting a healthier, more equitable provincial economy.

Paid Sick Leave:

Ontario's new Poverty Reduction Strategy must protect workers by ensuring that workers are allowed to recover from illness without facing income loss, job loss, or heightened economic vulnerability. Paid sick leave is a proven, cost-effective public health measure that reduces disease transmission and supports labour force participation**xxxiii xxxiix xl.

The government's introduction of a 27-week job-protected long-term illness leave under the *Employment Standards Act, 2000 (ESA)* is welcome, however it is deeply concerning that the amendments do not include provincially mandated paid sick days. Under the current *ESA*, workers continue to have zero guaranteed paid sick days and only three unpaid days per year, putting Ontario behind British Columbia^{xli}, Quebec^{xlii}, and federally regulated workplaces, all of which have legislated paid sick leave.

The absence of paid sick days is a labour issue that also has significant poverty and equity implications. Evidence from the COVID-19 pandemic shows that workers without paid sick leave were disproportionately exposed to illness and economic hardship^{xliii}. In Toronto, racialized residents, who are overrepresented in low-wage and high-risk sectors, accounted for 83 per cent of COVID-19 cases despite making up just 52 per cent of the population^{xliv}. Women, who often balance employment with caregiving responsibilities, were particularly impacted^{xlv}. Without legislated paid sick days, workers are forced to choose between their health and their income, an impossible decision that pushes many into deeper financial insecurity.

 Recommendation 5: Amend the Employment Standards Act, 2000 to include 10 employerprovided paid sick days annually, with an additional 14 paid days during declared public health emergencies.

Affordable and Secure Housing

A. Prioritize investment in affordable housing

Ontario is the only province or territory in Canada where municipalities are solely responsible for social housing. Ontario is in its third decade of this model and the result has been wait lists almost equivalent to our entire current stock (with decades long wait times), along with the quiet loss of existing social housing. *Ivi With 184,400 households in Ontario enrolled in rent-geared-to-income (RGI) housing programs, an additional 176,804 households are on RGI wait lists – demand is nearly double the current supply. *Ivii It is long past time for the province return to its historical role of investing in public housing, especially with the private market falling significantly behind housing start targets. *Iviii

One of the most effective ways to expand the supply of affordable housing is to invest in the development of public housing, non-profit, and co-op housing. Social housing, when properly resourced for capital and operating costs, has a proven track record of providing affordable housing in perpetuity for Ontarians. These stable, secure, and affordable homes are the type desperately needed in communities across Ontario. New market supply does not provide affordable rents – particularly for households living on lowand moderate-incomes.

Furthermore, increasing the number of social housing suites through either acquisition or new builds will counter the escalating financialization of housing. Investing in the non-profit housing sector will also create jobs, increase disposable income for renters, and improve social, educational, and health outcomes for our neighbourhoods and communities. To achieve the OECD standard proportion of community housing, Ontario needs to build or acquire at least 143,225 new suites by 2030 – a 43% increase in current stock.xlix Creating these additional homes would boost productivity between 5.8% - 9.5%, which would be comparable to a \$43 - \$70 billion boost to GDP.

The provincial government should use surplus land and properties for the development of affordable housing by leasing or selling the properties below-market value to non-profit developers. Doing so will guarantee these housing developments will be affordable in perpetuity. The province should also promote innovative models of land ownership, such as the community land trusts model. Community land trusts are local, private, not-for-profit organizations that purchase land and use it for the benefit of a community. This approach is one way for the government to remove properties from the speculative market and to allow the non-profit sector to develop affordable housing for lower income Ontarians.

- **Recommendation 1:** Invest in the development and acquisition of social housing and non-profit housing
- Recommendation 2: Ensure surplus land is preserved and only provided to non-profit and/or public housing projects
- B. Set clear and measurable targets and invest resources needed to end chronic homelessness

One of the outcomes of our prolonged housing crisis is that more and more Ontarians continue to be pushed into homelessness. At least 81,515 Ontarians experienced homelessness last year, an increase of 42% over the last 5 years. Without intervention this number could more than triple by 2035, leaving up to 294,000 people without stable housing. ^{II}

Employment alone does not prevent homelessness or poverty. Work must be accompanied with stable housing and services for people to keep long-term employment. We recommend that the province set clear measurable goals to reduce and ultimately end homelessness in Ontario. Evidence shows that people are more successful in moving forward with their lives if they are first housed. This is as true for people experiencing homelessness and those with mental health and addiction issues as it is for anyone. Instead of focusing primarily on emergency responses, the government must direct its energy and resources towards long-term solutions. A commitment to end chronic homelessness requires realistic, short, medium- and long-term targets, and the resources needed to implement it.

In order to end chronic homelessness, the province will need to invest resources to build capacity and implement policy solutions that help increase the number of affordable (and deeply affordable) housing units in Ontario. The Association of Municipalities of Ontario released a report in 2025 calling for an investment of \$11 billion over 10 years to end chronic homelessness. These investments would fund the development of new housing infrastructure including subsidized housing, supportive housing and transitional housing, as well as eviction prevention through early intervention and rent assistance.

Supportive housing is critical to reducing chronic homelessness, enabling individuals to achieve housing stability while receiving the supports they need. Ontario has an estimated shortage of 60,000 – 100,000 supportive housing suites. Consequently, 27,000 Ontarians on wait lists for supportive housing have wait times as long as 7 years. Investments in supportive housing have proven to be an effective use of public dollars. For every \$10 spent on housing and supports for those who are chronically homeless, \$21.72 is saved in costs related to health care, the justice system, shelters, and other social supports. We recommend that the Government of Ontario designate at least 40,000 suites of new community housing stock as supportive housing to house our most vulnerable residents.

In addition, we recommend the government improve inter-Ministerial policy and funding coordination within the Government of Ontario and across the three levels of government. The province needs to centralize resources, decision-makers and staff, and streamline efforts around ending chronic homelessness.

Enshrine a Rights-Based Approach to Encampments

Without sufficient mechanisms to prevent homelessness, and lacking adequate housing choices, individuals and households are forced to self-resolve their own housing crises through encampments. This means Ontarians living in encampments should be treated with dignity and not be criminalized nor discriminated against. As of 2023, a minimum of 1,400 encampments were in existence across the province (including anywhere from 1 to upwards of 100 residents).\(^{\mathbb{I}}\)

Any decisions municipalities make regarding encampments need to be in consideration of the perspectives of people living in encampments, who need to be part of these decision-making processes and should be

provided legal and any other additional supports required. Those living in encampments should have all basic needs met (i.e. safe drinking water, sanitation/waste management, social/healthcare services, personal safety, fire and food safety, harm reduction and pest prevention/management). As well, governments are obliged to respect self-determination of Indigenous encampment residents and consultation must take place to ensure consent before any actions that would impact residents are taken. To prevent human rights violations, residents cannot be removed from encampments without meaningful consultation, without legal supports, and without adequate housing options. In the case where all alternatives are exhausted and, if relocation is necessary, residents must be provided with long-term adequate housing solutions.^{37 38}

- **Recommendation 3:** Make significant, long-term investments to end chronic homelessness and provide housing solutions as viable alternatives to encampments
- Recommendation 4: Develop clear, measurable goals and targets to end chronic homelessness
- **Recommendation 5**: Develop a provincial encampment protocol to ensure that human rights are upheld

C. Implement full rent control and improve security of tenure for tenants

Based on average asking rents, seven of the top ten most expensive cities for tenants to live in are in Ontario. Ivi Four in ten renter households in Ontario spend 30% or more of their income on shelter; 15% spend 50% or more of their income on shelter and are at a higher risk of homelessness. Ivii The changes proposed by Bill 60 will further undermine tenants' security of tenure and speed up evictions, which runs counter to poverty reduction efforts. Iviii Long-term approaches to poverty reduction must include improvements to security of tenure for Ontarians who rent.

Vacancy decontrol, in place since 1998, allows landlords to set unlimited rents for new tenants in vacant units. This policy has steadily eroded affordable housing, as evidenced by the dramatic decline in affordable rentals and surge in luxury units over the past 15 years. In fact, new renters in Ontario pay an additional 24% in rent (an average of \$407/month) compared with ongoing tenants. Vacancy decontrol traps tenants in their current homes by making moves unaffordable, while giving landlords a powerful incentive to push out their long-term tenants. From 2020 to 2023, there was an unprecedented 85% increase in landlord own-use applications in Ontario. Ixi

Increasing the supply of rental housing is not enough. Recently built rentals have failed to make the housing crisis better. Since units built after November 15, 2018 have no rent controls in Ontario, their rents are usually expensive, undermining the goal of increasing affordable housing supply. In fact, in 2024, renters living in newly built rentals paid more than double the average rent in Sudbury, 50% more in rent in Toronto, 47% more in London, 45% more in St. Catharines and Niagara, 40% more in Ottawa, 39% more in Kitchener-Cambridge-Waterloo, 38% more in Kingston, and 37% more in Windsor.

Research confirms that modern rent control policies do not discourage new rental construction, making this a straightforward way to protect tenants. Full rent control would deliver immediate benefits, protecting housing affordability for Ontario's 1.7 million renter households in the private market. Renters could freely choose where to live as their needs change, without being limited by unaffordable rents. Eliminating vacancy decontrol would reduce fraudulent "own-use" evictions and renovictions by removing the profit motive to push out existing tenants. Scrapping the 2018 exemption would preserve landlords'

ability to set initial rents at market rates for new buildings but prevent unlimited increases afterwards. Furthermore, renters would not be facing rents that are 37%-50% higher than average to move into a newer suite. Removing the 2018 exemption would ensure new rental construction improves rather than worsens the affordability crisis.

• **Recommendation 6**: Repeal Section 113 (*Vacancy Decontrol*) of the Residential Tenancias Act, 2006 and Sections <u>6.1 (2), 6.1 (3), 6.1 (4), 6.1 (7)</u> (2018 Exemption) of the Residential Tenancies Act, 2006

Endnotes

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