



Office of the Premier  
The Honourable Doug Ford  
Premier of Ontario

Via Email: March 30, 2026

**Re: Gendered Impacts of Bill 10 – Protect Ontario Through Safer Streets and Stronger Communities Act, 2025**

Dear Premier Ford,

We are writing you today to share our perspectives on **Bill 10, Protect Ontario Through Safer Streets and Stronger Communities Act, 2025**. YWCA Ontario is a coalition of 10 YWCA Member Associations across the province, serving over 40,000 women, gender diverse people and children annually through housing and emergency shelter, violence prevention, employment and training, and other community services

While we share the province's commitment to building safer, healthier communities, we fear this Bill will have harmful impacts on nonprofit housing providers and on tenants across Ontario, particularly women and gender diverse individuals. As the Ontario Nonprofit Housing Association (ONPHA) has highlighted, the legislation introduces new responsibilities, compliance pressures, and penalties that could significantly disrupt how nonprofit housing providers operate, despite our already limited resources.

**Impact of the lack of clarity and security = greater vulnerability to homelessness for women**

Homelessness in Ontario continues to climb, with 84,973 Ontarians experiencing homelessness in 2025, a 7.8% increase from 2024, according to the Association of Ontario Municipalities. Women, gender diverse people, and families are among the fastest-growing populations experiencing homelessness, and we fear the current framing of this Bill will exacerbate housing instability. Specifically, Bill 10 poses a risk of increased surveillance, profiling, evictions, and housing precarity, and lacks important nuance and definition, including what constitutes "knowingly permitting" drug activity or what "due diligence" entails, as well as what constitutes "reasonable steps." Additionally, it is unclear what quantity of a substance constitutes "trafficking" or what protections exist for staff and tenants. The ambiguity of this legislation poses serious risks for our organizations and forces discretionary enforcement over tenants.



The threat of eviction or increased scrutiny can dissuade those fleeing violence, healing from trauma, and/or relying on supportive housing from seeking help, reporting violence, or accessing critical services. The legislation, therefore, increases the vulnerability of the exact populations that community housing exists to serve.

As community housing and emergency shelter providers, our mandate is to deliver care, stability, and trauma-informed support to individuals with complex needs. While nonprofit providers already invest heavily in security and community safety, the expectations embedded in Bill 10 risk downloading enforcement and surveillance roles onto organizations that lack the legal authority, specialized training, or resources to perform them. Forcing community organizations into a pseudo-enforcement position will exacerbate staff burnout and turnover in an already strained sector, struggling to recruit and retain staff. Additionally, it would compromise the trust that staff have built with program participants to support them through their experiences of violence, trauma, and complex health needs. Furthermore, nonprofit organizations are already navigating heightened insurance costs – legislation such as this can increase those costs, as well as legal fees, further putting our services at risk.

### **Impact on housing stability and the broader rental market**

While we recognize and appreciate the proposal to exempt some social and supportive housing providers from the definition of landlord, this legislation will still impact renters – many of whom are low-income tenants, seniors, newcomers, and women-led households – so long as it applies to private landlords.

If landlords face large fines or potential jail time for activity they cannot reasonably monitor, many will exit the rental market, sell their properties, intensify their tenant screening practices and/or discriminate against tenants they assume are higher risk. This means a reduced supply in already limited stock of affordable rentals, inevitably harming women and gender diverse people who rely on this housing to escape violence, house children, find and sustain work, etc. Amidst a deepening housing crisis, any move that will exacerbate the limited supply of affordable housing poses a risk to Ontarians and the broader economy.

### **Recommendations:**

We urge the Government of Ontario to repeal Bill 10 in its entirety.

Sector feedback, including that of the Ontario Nonprofit Housing Association and the Ontario Nonprofit Network, along with those with lived experience as renters and



landlords, makes clear that in its current state, Bill 10 will harm communities made vulnerable to and by homelessness and the organizations that support them.

We all want safe, healthy, thriving communities. Safety cannot be built through enforcement measures that destabilize housing, strain community organizations, and disproportionately harm women, gender diverse people, families and tenants. We urge the Government of Ontario to reconsider Bill 10 in the interest of public safety and welcome the opportunity to meet and discuss this legislation further.

Sincerely,  
YWCA Ontario