



January 23, 2020

Hon. Rod Phillips, Ontario Minister of Finance

Ontario Legislature's Standing Committee
on Finance and Economic Affairs

Amarjot Sandhu, Chair
David Piccini
Dave Smith

Jeremy Roberts, Vice-Chair
Kaleed Rasheed
Sandy Shaw

Ian Arthur Sol Mamakwa
Donna Skelly

Dear Members:

On behalf of the residents; Board of Directors and staff of Don Valley Community Legal Services, we are writing to the Ontario's Standing Committee on Finance and Economic Affairs - **Pre-Budget Consultations to support the written submission submitted January 17, 2020 by the Income Security Advocacy Center. ISAC is a trusted Speciality Clinic that consults regularly with residents across Ontario on the matter of income supports affecting our most vulnerable.**

Don Valley Community Legal Service is the local general services community legal clinic governed by a Community Non Profit Board of Directors within the Provincial ridings of Toronto Danforth, Beaches East York, Don Valley East, Don Valley West, Toronto – St. Pauls' and Toronto and University Rosedale. We provide summary advice, legal representation, public legal education, community development and law reform services to those living in poverty, the disabled and the disadvantaged.

The demographics for these six ridings encompass 400,000 or more residents with an average unemployment rate between 6.3% up to 9% and on average 47% of tenant households spend more than 30% of their income on shelter costs.¹ The 2016 City of Toronto Ward Profiles (which are in alignment with the Provincial Ridings) indicate that the average low income rate is approximately 16 to 23.4 % (after-tax low income measure). DVCLS understand that the Province is working towards supporting an inclusive Poverty Reduction strategy. By supporting ISAC's following Budget recommendations, it would support the aims and mandate of the Ontario Poverty Reduction Strategy to provide supports to the most vulnerable.

Income Security Programs:

- **Recommendation #1:** Increase social assistance rates to reflect real costs of living, including housing costs based on average market rents, utility costs, the cost of a nutritious food basket, transportation, communication devices including telephone and internet, all personal basic needs,

¹ City of Toronto Ward Profiles, 2016 Census – 2018 25 Wards <https://www.toronto.ca/city-government/data-research-maps/neighbourhoods-communities/>

Don Valley Community Legal Services

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and costs that people with disabilities experience based on their specific needs. Rates should also increase with inflation.

- **Recommendation #2:** Maintain the current definition of a “person with a disability” for the purposes of eligibility for the Ontario Disability Support Program (ODSP). The proposed change to align with federal program definitions would disentitle persons with disabilities in need.
- **Recommendation #3:** Ensure sufficient funding, inter-ministerial collaboration and administrative alignment so that OW and ODSP recipients receive wrap-around services, such as childcare, housing, mental health treatment, addictions treatment, and employment supports necessary to achieve their personal goals.
- **Recommendation #4:** Maintain the independence and appellate functions of the Social Benefits Tribunal in order to ensure that administrative social assistance decisions do not wrongly deny supports that Ontarians need to meet their most basic needs. Invest in improving first-level decision making and in filling Social Benefit Tribunal vacancies.
- **Recommendation #5:** Make the Canada-Ontario Housing Benefit available to social assistance recipients who are tenants, without any claw-back of OW or ODSP benefits.

Workers' Rights:

- **Recommendation #6:** Increase the number of inspectors under the *Occupational Health and Safety Act* and the *Employment Standards Act*, in order to ensure safe working conditions and proper pay for Ontario's workers.
- **Recommendation #7:** Immediately increase the minimum wage to \$15 per hour, restore annual indexation to the Consumer Price Index, and implement laws to ensure that workers who do similar work receive equal pay.
- **Recommendation #8:** Reinstate 10 Personal Emergency Leave Days, including seven days as paid leave.

Legal Aid Ontario:

- **Recommendation #9:** Reverse the cuts to Legal Aid Ontario and make significant investments in access to justice for Ontario's workers and social assistance recipients.
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We thank you for this opportunity to support the work of Legal Clinics and Legal Aid Ontario across the Province and enable residents access to justice through a just budget that supports all residents, including our most vulnerable.

Yours truly,
Don Valley Community Legal Services



Stewart Cruikshank
Executive Director

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