



SUBMISSION **JHSO Submissions to the Poverty Reduction Strategy Consultations**

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Centre of Research & Policy



John Howard Society of Ontario

T: 416-408-4282

W: www.johnhoward.on.ca

LinkedIn: [John Howard Society of Ontario](#)

About the John Howard Society of Ontario

For more than 90 years, we've worked to keep the humanity in justice.

Today we continue to build a safer Ontario by supporting the people and communities affected by the criminal justice system. Our 19 local offices deliver more than 80 evidence-based programs and services focused on prevention, intervention and re-integration across the province. These range from helping youth develop the life skills that will let them achieve their full potential, to helping families navigate issues of criminal justice, to providing job training for those leaving incarceration so they can contribute to their community in a meaningful way. We promote practical, equitable policies while raising awareness of the root causes of crime and calling on Ontarians to share responsibility for addressing them. Within the system itself, we advocate for the fair treatment of every individual. Each year, our work impacts the lives of more than 100,000 Ontarians.

Please accept this document as the submission of the John Howard Society of Ontario (JHSO) to the 2025 Poverty Reduction Strategy consultations.

People impacted by the criminal justice system are among those most deeply affected by poverty. Barriers such as criminal record stigma, limited access to stable housing, and exclusion from employment opportunities perpetuate cycles of marginalization and economic instability. Poverty carries significant social and economic costs for the province, including increased pressure on healthcare, housing, and social services. Addressing the structural barriers that keep justice-involved individuals in poverty offers benefits both for individuals and society.

Upstream solutions prevent costly emergency and correctional measures and divert people out of poverty rather than entrenching them in it. Investments in housing, community development, and employment initiatives stabilize vulnerable groups, enhance their skills, and encourage their participation in the workforce.

The recommendations outlined in these submissions would allow more Ontarians to connect to crucial services, move into meaningful employment and would help build safer, more thriving communities.

Income assistance

Income assistance¹ serves as a critical foundation in any comprehensive poverty reduction strategy, not as an alternative to employment but as an essential support that enables individuals and families to meet their basic needs during periods of vulnerability. While fostering economic independence and workforce participation remain important long-term objectives, income assistance provides the stability necessary for people to pursue sustainable pathways out of poverty, whether that involves addressing health challenges, acquiring new skills, or securing safe housing.

Income assistance is critically important to prevent criminal behaviour and recidivism among people without income and those unable to work due to disability. However, currently, when an individual is incarcerated, whether or not they have been tried and sentenced, they are not eligible to continue to receive their Ontario Works (OW) or Ontario Disability Support Program (ODSP) benefits. Even short periods of incarceration can have devastating consequences. When benefits are cut off, individuals can lose their housing, fall behind on essential payments, and face additional financial hardship. If benefits are continued during incarceration, an individual may later be required to repay those funds, further entrenching them in debt and poverty.

Upon release, reinstating benefits is rarely immediate and can take weeks or even months. During this time, individuals are left without income, increasing their risk of homelessness, food insecurity, and recidivism. The majority of individuals held in provincial correctional institutions have not been convicted of a crime, and many will later have their charges withdrawn. Despite this, the interruption in income assistance can have lasting consequences, starting people on a cycle of instability and poverty that is difficult to escape.

¹ Income assistance refers to the Ontario Works and Ontario Disability Support Programs available to eligible Ontarians that require financial assistance.

When a person is hospitalized in Ontario, their benefits are maintained in full for at least three months to prevent housing loss. Updating the OW and ODSP policy directions to match that of hospitalization, would help prevent unnecessary housing loss and interrupt the cycle of poverty many individuals find themselves in post release. Without stable income, affordable housing options are far and few between, and many individuals end up relying on emergency shelters or unsafe arrangements that do not support successful reintegration. Reducing interruptions in income assistance provides individual benefits and is a cost-effective way to prevent homelessness and more intensive interventions longer term.

Additionally, current income assistance rates have not kept up with the cost of living and keep individuals well below the poverty line. Increasing income assistance rates would allow individuals to access housing, services and supports to foster workforce participation for those with labour market potential.

Recommendations:

- Amend the OW and ODSP policy directives to allow incarcerated recipients to receive benefits for up to 3 full calendar months. This would bring the policy in line with the directives for recipients who are hospitalized, which allows benefits to continue in full for at least three months to prevent housing loss during stays in the hospital.
- Increase income assistance rates proportionally to reflect the true cost of living based on different areas of Ontario.

Supportive Housing

Access to safe, stable and affordable housing is essential for poverty reduction. Without a secure place to live, individuals face immense barriers to reintegrating into society, participating in the workforce and supporting themselves and their families. Developing and expanding housing options, especially transitional supportive housing models, is essential to addressing both the causes and consequences of poverty for those exiting the justice system.

Supportive housing provides shelter combined with wraparound supports. These supports are especially vital for people leaving correctional institutions, many of whom are released into homelessness. Some individuals have mental health and addictions challenges or require life skills support to be able to acquire and maintain independent housing. Transitional supportive housing stabilizes individuals, prevents reoffending and prepares them for longer term housing options. These services should be tailored to individual needs and may include mental health and substance use treatment, employment and education programs, life skills development and practical assistance. By combining affordable housing with wraparound support, individuals are more likely to achieve long-term stability, reduce their reliance on emergency services and rebuild connections in their communities.

Currently, Ontario does not have a coordinated provincial housing system designed to support individuals exiting provincial correctional institutions. As a result, many people face immediate housing instability upon release.

This housing gap has significant consequences. In 2023-2024, 7455 releases from provincial corrections were recorded as having no fixed address.ⁱ Meaning that thousands of individuals are

leaving custody and going directly into homelessness, often living in emergency shelters or encampments. Without stable housing, individuals face increased risks of reoffending, deteriorating mental and physical health and deeper entrenchment into poverty. All of which place additional strain on already overburdened community and health services.

Investing in supportive housing is also fiscally responsible. The cost of providing supportive housing is significantly lower than the cumulative costs associated with homelessness, including emergency room visits, hospital readmissions, policing and incarceration.ⁱⁱ Intensive supportive housing for mental health and addictions costs between \$2,000-\$5,000 per month to operate, which is significantly less than psychiatric hospitals (\$31,500/month), mental health facilities (\$17,000/month) and correctional facilities (\$11,000/month).ⁱⁱⁱ The costs of supportive housing are much lower for individuals with less acute needs who may require referrals to community supports and/or some case management.

For individuals leaving custody, the absence of stable housing can be a direct driver into poverty. Without a safe place to live, securing employment, maintaining income supports and reintegrating into the community is incredibly challenging. Transitional supportive housing, as part of a system of appropriate housing options, offers individuals a pathway out of poverty and the structured supports to promote safer communities.

Recommendation:

- The provincial government should create a system of transitional housing for people exiting provincial correctional institutions, similar to the model of community-based residential facilities for the federal system. Transitional housing options in the province should include culturally appropriate programs, that provide wrap around services, supports and focus on healing to address underlying social issues and prevent reoffending.

Employment

Employment is one of the most powerful and consistent predictors of successful reintegration for individuals with criminal records. Meaningful work provides not only income, but also stability, a sense of purpose, and connection to community, all of which are essential in breaking cycles of poverty and reducing recidivism. Yet despite widespread agreement on the importance of workforce participation, Ontario lacks a coherent policy framework to remove the systemic barriers that keep individuals with criminal records locked out of employment opportunities.

Currently, many employers conduct record checks as a standard screening tool without clear relevance to the position being filled.^{iv} This practice often excludes otherwise qualified candidates from employment opportunities, regardless of the nature of the offence, the time that has passed or evidence of rehabilitation. For individuals re-entering the community, these systematic barriers compound existing challenges such as housing insecurity, limited access to education or training, and social stigma.

The evidence is troubling. Findings from Public Safety Canada show that after an average of 14 years post-release, most individuals remained underemployed with a median income of \$0. Among those who were employed, the average annual income was approximately \$14,000.^v This is half of what is needed

to meet the poverty line in Ontario. Individuals with criminal records are 50% less likely to secure employment and the rates are higher for Black and Indigenous job seekers with criminal records.^{vi} These figures reflect not a lack of wanting to or willingness to work, but instead the systemic exclusion built into current hiring practices.

Reducing barriers to employment for individuals with criminal records helps them to participate in the labour market. Employment is essential for preventing re-offending, reducing long-term reliance on income supports, and promoting social and economic stability. Lowering employment barriers for individuals with criminal records benefits public safety as well as addressing poverty and strengthens Ontario's workforce and economy.

What is needed is a comprehensive, province-wide strategy that actively promotes workforce participation for individuals with criminal records. The strategy should include legislated standards, financial incentives for employers, expanded human rights protections and targeted employment supports.

The following recommendations outline components of such a strategy that promotes inclusion of people with criminal records in the workforce, thereby lifting communities out of poverty.

Legislative Guidance for Employers on Record Check Policies

In Ontario, there is no legislated guidance for employers on conducting record checks for employment purposes. Currently, blanket record check policies by employers lead to outright exclusion of any candidate with a criminal record, regardless of the type of offence, when it occurred or the relevance to the position. The lack of regulation of employer practices around record checks creates a major barrier to getting otherwise qualified workers into jobs, especially for in-demand industries.

There is an opportunity to build on recent amendments to the *Employment Services Act* to include guidelines around the use of criminal record checks. Including clear guidelines and direction about the appropriate use of criminal record checks within the *ESA* would significantly enhance employer understanding of when and how these checks should be used and provide greater transparency to jobseekers.

Recommendation:

- **Amend the Employment Standards Act (ESA) to set out requirements for posting and conducting criminal record checks in the hiring process.**

Some of the amendments could include:

- Every publicly advertised job posting should include information about whether a criminal record check will be required and if so, which level of check.
- If a criminal record check is required for the position, the job posting should indicate which types of convictions will be considered relevant. In determining which types of convictions would be relevant, only those convictions with a direct relationship between the offence and the position should be considered

- If a criminal record check is required but will not be an automatic disqualifying factor, this should be stated in the job posting. Said differently, if an employer is willing to individually assess candidates even if they have a record, this should be stated.
- Criminal record checks should only be conducted after a conditional offer of employment has been made.
- Employers should establish policies to limit access to criminal record check results to only those who require it (i.e. Human Resources) protecting the worker's privacy.

Many companies lack clear workplace policies, so criminal record checks are often conducted for most or all positions, and candidates with a criminal record, regardless of its age or relevance to the position being sought, are often unilaterally excluded.^{vii} Including legislation like this would push employers to develop policies and determine when a record check is needed and when it is not, and what types of records are actually relevant.

Financial Incentives for Employers

When employers are asked about what would encourage them to adopt more inclusive hiring practices, funding incentives are one of the proposed measures.^{viii} Financial motivations have the potential to influence employer practices as evidenced by the United States, where tax credits have proven to be effective in incentivizing the hiring of people with criminal records as well as other target groups that face disproportionate unemployment. Programs like the Work Opportunity Tax Credit has been shown to produce positive outcomes for individuals and to produce social service savings.^{ix}

Introducing tax incentives can help get more individuals through the door which is often a barrier for people with criminal records. With more opportunities for employment, more Ontarians would be able to move out of poverty.

Recommendation:

- **Introduce tax or other fiscal incentives for employers who can demonstrate they are hiring individuals with criminal records.**

Expand protections against discrimination based on criminal records

Negative perceptions and misconceptions about individuals with criminal records fuel employment discrimination that the *Ontario Human Rights Code* does not safeguard against.

One of the protected grounds in the *Human Rights Code* is "record of offences". This applies solely in an employment context and only pertains to convictions that have received a record suspension (pardon) and provincial offences, like traffic tickets. That means that an employer can legally discriminate against a job candidate with a criminal record if they have not received a record suspension.

We advise the provincial government of Ontario to amend the *Ontario Human Rights Code* to broaden the definition of record of offences, protecting against discrimination based on criminal convictions that are not relevant to the position.

Ontario falls short of other provinces in terms of human rights protections. British Columbia protects against discrimination in employment based on a "criminal or summary conviction offence that is

unrelated to the employment or to the intended employment of that person”.^x Prince Edward Island, Quebec, Newfoundland and Labrador and the Yukon Territories all have similar protections against discrimination based on criminal convictions that are not relevant to the position or type of employment.

Expanding the *Human Rights Code* to replace “record of offences” with “police record” and broadening its definition is essential to address systemic barriers to employment faced by individuals with criminal records would help prevent undue discrimination and provide recourse when it occurs.

Recommendation:

- **Amend the Ontario Human Rights Code with the following:**
 1. The term “record of offences” should be replaced by “police record”.
 2. “Police record” should include charges and convictions, with or without a record suspension, and other police record information, including contact with police.

Targeted Employment Supports

Tailored employment programs are essential to address the unique and often complex challenges faced by individuals with criminal records in their job search. Finding a job with a criminal record is already challenging, but the barriers are compounded for Black and Indigenous people, individuals living with mental health conditions, and those with disabilities. Individuals can face systemic racism, ableism, or other forms of discrimination that intersect with the stigma of a criminal record, creating distinct experiences of exclusion. Understanding intersectional experiences and challenges in the job search and using a culturally safe and specific approach to employment supports is critical.

Targeted programming for jobseekers with criminal records in Ontario should be invested in appropriately and reflect the high level of case management required in order to achieve successful job placement outcomes.

Recommendation:

- **The Provincial government should increase investment into employment programming specifically for job seekers with criminal records.**

Thank you for reviewing our submission to the Poverty Reduction Strategy consultation process. We welcome the opportunity to discuss any of the above in greater detail.

ⁱ John Howard Society of Ontario (2025) Rethinking Justice: From Incarceration to Encampment. Retrieved from <https://johnhoward.on.ca/wp-content/uploads/2025/07/Rethinking-Justice-Housing-Report-From-Incarceration-to-Encampment.pdf>

ⁱⁱ Housing and justice report: Improving supportive housing for justice-involved individuals with mental health and addiction issues. (n.d.). In *HSJCC Housing and Justice Report*. Retrieved from https://hsjcc.on.ca/wp-content/uploads/HSJCC_Housing-Justice-Report_EN-updated.pdf

ⁱⁱⁱ Addictions and Mental Health Ontario. (2025) Unlocking Solutions: Understanding and Addressing Ontario’s Mental Health and Addictions Supportive Housing Need. Retrieved

from [https://amho.ca/our-work/advocacy-awareness/supportivehousing/#:~:text=Operating%20costs%20for%20supportive%20housing,facilities%20\(\\$11%2C000/month\)](https://amho.ca/our-work/advocacy-awareness/supportivehousing/#:~:text=Operating%20costs%20for%20supportive%20housing,facilities%20($11%2C000/month))

^{iv} John Howard Society of Ontario (2020) Not in My Workplace. Retrieved from <https://johnhoward.on.ca/wp-content/uploads/2024/01/Not-in-My-Workplace-Report-Final.pdf>

^v Public Safety Canada. (2022). *Economic outcomes of Canadian federal offenders*. <https://www.publicsafety.gc.ca/cnt/rsrscs/pblctns/2021-r002/index-en.aspx>

^{vi} John Howard Society of Ontario (2020) Not in My Workplace Retrieved from <https://johnhoward.on.ca/wp-content/uploads/2024/01/Not-in-My-Workplace-Report-Final.pdf>

^{vii} Ibid.

^{viii} Ibid

^{ix} Fry, J. (2021) Dual Value of the Work Opportunity Tax Credit: Reduce turnover while increasing income. White Paper. Retrieved from https://assets.equifax.com/wfs/workforce/assets/wfs_Dual_Value_Of_The_WOTC.pdf

^x Human Rights Code, [RSBC 1996], chapter 210, s13 .