

How Bill 6 & Bill 10 Impact Cis Women and Gender Diverse People Across Ontario



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Two proposed laws—**Bill 6: The Safer Municipalities Act** and **Bill 10: The Protect Ontario Through Safer Streets and Stronger Communities Act**—moved rapidly through the Ontario Legislature this spring, 2025. While both claim to enhance public safety, their provisions and the government's commitments with these Bills will intensify the criminalization, surveillance, and marginalization of cis women and gender-diverse people and these harms will be disproportionately borne by those who are Black, Indigenous, migrant, sex workers, and/ or those living in poverty, and especially those who are also living with HIV. This overview provides information about key tenets for both Bills through a gender-based analysis, and aims to:

- Support local awareness raising and advocacy related to these Bills across Ontario
- Provide considerations for supporting those most impacted by these bills
- Assist in developing community-based responses that includes gender and equity-based considerations

Bill 6: The Safer Municipalities Act Overview

[Bill 6](#), The Safer Municipalities Act, was introduced in the Ontario Legislature on April 30, 2025, received Royal Assent, making it law on June 5, 2025. While the Ontario government's [announcement of this Bill](#) included a commitment to investing in housing (815 long-term affordable and supportive housing units province wide), shelter and temporary accommodation (971 shelter spaces across the entire province), and investing in Ontario's housing benefit, the amounts promised would not cover the

housing and shelter needs in most communities in Ontario, let alone the entire province.¹ Beyond these investments, this Bill extends the existing reach of police to evict people who use drugs from encampments and temporary dwellings in public spaces. Under the law, police can ask for identification, seize someone's drugs, and arrest them. If convicted of an offence of using drugs in public space, a person could be fined up to \$10,000 and / or be imprisoned for up to 6 months. While these laws already existed, the Bill amplifies police powers and entrenches the criminalization of people living in poverty and who use drugs, disproportionately impacting cis women and gender-diverse people alongside Black, Indigenous and migrant people across Ontario, and especially those living with HIV.

Gendered Impacts of Bill 6:

Bill 6, Gender & Poverty:

This Bill has significant impacts for women and gender-diverse people. According to the [Women's Legal Education & Action Fund](#), "...more women and gender-diverse people live in poverty than men, and their experiences of poverty can be harsher, deeper and more prolonged." LEAF specifically draws attention to the fact that 11.4% of women in Canada live in poverty compared to 9.7% of men, 12% of Trans women and 20% of Non-Binary people. Further to these realities, 31.3% of single mothers live in poverty.² The promise of a minimal number of shelter beds, a solution that should not be considered a "home," is an exceedingly inadequate solution to the crisis of poverty and homelessness in Ontario where there are currently estimated to be over 80,000 homeless people in the province, a

1 Collective Letter to Mayor Sutcliffe Against Bill 6, from City for All Women Initiative. May 21, 2025.

2 LEAF: [Gender and Poverty](#), July 5, 2023.

25% increase since 2022.³ The targeting of people living in poverty within this Bill disproportionately impacts these specific communities in severe and complex ways.

Bill 6 & HIV:

When considering the intersection of these realities for cis women and gender-diverse people living with HIV, we know that 54.8% of those identifying as women in the Ontario HIV Treatment Network Cohort Study (OCS)⁴ (2021) were unemployed, 36% had an income below the poverty line, 53.9% reported food insecurity, 59.3% reported difficulty in paying for housing costs, and 39.8% have children under the age of 18.⁵ These realities are even starker for Trans women living with HIV where only 22.7% reported paid employment and the majority have an income under the poverty line and face food insecurity.⁶

Bill 6 & Newcomer, Refugee, Migrant & Indigenous Women:

These realities also have significant impacts for newcomer, refugee, migrant and Indigenous women living with HIV and living in poverty. According to Stats Canada, more than 15% of women who immigrated to Canada in the last decade live in poverty, 28.9% of Indigenous women on reserve are living in poverty and 11.5% of Indigenous women living off reserve live in poverty.⁷ Amongst women living with HIV participating in the OCS (2021), 66.1% were born outside of Canada, 58.7% identified as African, Caribbean or Black, and 6.2% identified as Indigenous.⁸ This overlap of racial identity and migrant status with poverty rates demonstrates how Bill 6 will disproportionately impact these groups of cis women and gender-diverse people.

Bill 6 & Extended Police Powers & Surveillance:

Beyond the notable impacts of Bill 6 for women and gender-diverse people in Ontario, this Bill's extension of existing police powers increases the risks for sex workers to be targeted, searched and arrested, particularly those who use drugs, are living in encampments or temporary dwellings, or are newcomers and face risk of deportation and violence in their countries of origin. It also increases the risk of intervention through colonial systems of family surveillance, which have been shown to disproportionately target Black, Indigenous and Trans women and those living with HIV.⁹

The impact of these carceral systems of punishment and surveillance translate directly into reduced engagement in care. Cis women and gender-diverse people who face these risks are less likely to seek support through the health care system and less likely to access social and community support. When they do engage, they face heightened risk of criminalization. As a result, these communities will face increased isolation, which also translates into increased risk of violence and overdose due to drug toxicity, and other worsened health outcomes.

As shown here, this Bill poses significant risk to cis women and gender-diverse people, particularly those living with HIV. Of note, this Bill will fast track the incarceration of women, disproportionately impacting cis women and gender-diverse people living with HIV including those who are Black, Indigenous, and newcomer or migrant women.

Bill 10: The Protect Ontario Through Safer Streets and Stronger Communities Act Overview

Bill 10, The Protect Ontario Through Safer Streets and Stronger Communities Act, was introduced in

3 [Association of Municipalities of Ontario](#): AMO Launches Groundbreaking Homelessness Study: Ontario at a Tipping Point with 80,000 homeless. January 9, 2025.

4 [Ontario HIV Treatment Network Cohort Study](#) presentation to WHAI October 14, 2025. (The OCS was established in 1996 and is a longitudinal cohort study of people living with HIV in Ontario).

5 Ontario Cohort Study Presentation to WHAI. October 2021. Ontario HIV Treatment Network.

6 [Trans Women's HIV Research Initiative: Social Determinants of Health: A trans cultural perspective](#). May 2025.

7 Statistics Canada: [Individual low-income status by Indigenous identity and residence by Indigenous geography: Canada, provinces and territories](#). May 2025 and LEAF: [Gender and Poverty, July 5, 2023](#).

8 Ontario Cohort Study Presentation to WHAI. October 2021. Ontario HIV Treatment Network.

9 Ontario Human Rights Commission: [Interrupted childhoods: Over-representation of Indigenous and Black children in Ontario child welfare](#). May 2025.

the Ontario Legislature in May 2025, and received Royal Assent on June 5, 2025, making it law. While this Bill claims to strengthen safety for Ontarians including those who experience intimate partner violence and others who are victims of crime, the actual schedules within the Bill are founded in carceral systems of surveillance that will disproportionately impact cis women and gender diverse people, sex workers, women experiencing violence, migrant and Indigenous women, especially those living with HIV.

In particular, this [Bill](#) and the [Ontario governments commitments](#) in the announcement of this Bill include provisions to charge a fee to those required to wear electronic GPS monitoring, enhance the abilities of police to monitor people accused or convicted of crimes, extend funding for police and prisons including funding the opening of additional jails in Kenora and Timmins, and the exploration of mandatory treatment for people in prison as a condition of incarceration and / or probation and parole. Further, posed as an effort to address human trafficking, the government's announcement of this Bill includes support for police to access the names of those staying at hotels and other businesses including refugees and other migrants as well as sex workers and people using hotels for accommodation in the midst of housing shortages, a practice already in place under [Bill 251](#) (2021) and documented to challenge the safety and rights of sex workers and others.¹⁰ In addition, this Bill includes provisions to fast track the assignment of new judges with increased government oversight and power in the selection of judges, paralleled by a commitment by the Ontario government to add 17 more judges, while expanding opportunities for fees and financial penalties to fund the expansion of Ontario's carceral system. This range of legal system amendments will have disproportionate and severe impacts for cis women and gender-diverse people, particularly impacting Black and Indigenous people and those living with, or who face systemic and structural risks related to, HIV and other health precarities.

Gendered Impacts of Bill 10:

Bill 10 & Extended Police Powers Impact Women & Gender Diverse People Who do Sex Work, Use Drugs, are new to Canada, and / or who have experienced Gender Based Violence:

The Ontario government's commitment in the announcement of this Bill to extend police powers to access the names of those staying at hotels and other businesses and the extension of police surveillance systems means that police will have increased ability to question and criminalize those who do sex work, use drugs, and face housing insecurity, disproportionately impacting cis and gender-diverse women, especially those who are newly arrived in Canada. Many of these practices were instated under Bill 251 and have been shown to increase safety risks for sex workers and other marginalized groups of women and gender-diverse people.¹⁰ The provincially identified indicators of those who may be trafficked include not having identification, being isolated from family or friends, showing signs of fear, anxiety, depression, hypervigilance or intimidation, wearing inappropriate clothing and more.¹¹ These identifiers also describe those who are facing housing insecurity, newcomers and migrant women who may not have a home, those who use drugs, and those who have experienced trauma including gender-based violence. Of note, femicide is a growing reality in Ontario with 16 femicides occurring in the past 6 months, with nearly 70% occurring by a current or former intimate partner.¹² A consequence of this increased police power and surveillance is the further isolation of women and pushing activities like sex work underground and into less safe spaces, fast tracking the criminalization of those who use drugs or do sex work, and risking the safety of those who have migrated here for safety due to violence and discrimination in their country of origin, and creating barriers to accessing support and health care.

10 Ontario Coalition of Rape Crisis Centres: [Bill 251, Combating Human Trafficking Act, 2021: Ontario Coalition of Rape Crisis Centres responds](#). Published July 14, 2021. Accessed June 4, 2025.

11 [Ottawa Police Human Trafficking](#), May 2025.

12 [Ontario Association of Interval and Transitional Houses](#) (OAITH), [Monthly Femicide Snapshot](#). June 2025.

Bill 10 & HIV

The populations impacted by this legislation are also disproportionately impacted by HIV and other health risks. We know that Trans women living with HIV often rely on sex work for income due to discrimination in the employment market, predisposing them to this increased risk from extended police powers.¹³ We also know that women who use drugs face disproportionate structural risks related to HIV acquisition, and area also targeted within the tenants of this Bill and the governments commitments. In fact, in 2022, of the 10.6% of new HIV diagnoses in Ontario acquired through injection drug use, 36.5% were females, a rate that is disproportionate to the overall rate of HIV amongst females.¹⁴ Further, women who use drugs face barriers to health care and therefore take longer to be connected to HIV care and reach viral suppression. More specifically, once diagnosed with HIV, it takes females who use drugs 40 days to have a viral load test compared to an average of 16 days for newly diagnosed people and 226 days for viral suppression, compared to 91 days for newly diagnosed people.¹⁵ Finally, this Bill impacts newcomer and migrant women living with HIV. Amongst women living with HIV participating in the Ontario Cohort Study (2021), 66.1% were born outside of Canada, 58.7% identified as African, Caribbean or Black, and 6.2% identified as Indigenous.¹⁶ This overlap of racial identity and migrant status with poverty rates demonstrates how Bill 10 will disproportionately impact these groups of cis women and gender-diverse people.

Conclusion & Next Steps

As clearly outlined here, Bill 6 and 10 both have serious implications for cis women and gender-diverse people—especially those who are Black, Indigenous, migrant, sex workers, who have experienced violence, and / or are living in poverty. These are populations who are all also disproportionately impacted by structural HIV risk and have worse health outcomes overall. These bills will result in the intensification of criminalization for

these populations, increase surveillance, reduce safety, and result in further isolation and barriers to health and social support services.

Our hope in sharing this analysis is that it will support local work to:

- Advocate for these communities who are disproportionately impacted so that they are not left behind in our government policies and responses
- Challenge the current framing of safety within both Bills and how these framings leave the most marginalized communities behind
- Assist in the development of community-based responses that includes gender and equity-based considerations
- Provide considerations to inform the provision of support for those most impacted by these bills

We will review this resource as these Bills are rolled out. If you have any feedback or edits, please contact Molly Bannerman at mbannerman@whai.ca

13 [Trans Women's HIV Research Initiative: Social Determinants of Health: A trans cultural perspective. May 2025.](#)

14 [HIV Diagnosis in Ontario, 2022.](#) Ontario HIV Epidemiology and Surveillance Initiative.

15 Ontario HIV Treatment Network, email communication, September 2024.

16 Ontario Cohort Study Presentation to WHAI. October 2021. Ontario HIV Treatment Network.