



**Response to the Long-Term
Affordable Housing Strategy Consultation**

**Ontario Association of Interval and Transition Houses (OAITH)
December 2009**

Introduction

OAITH would like to thank the Ministry of Municipal Affairs and Housing for the opportunity to participate in the consultation on a Long-Term Affordable Housing Strategy for Ontario. The Ontario Association of Interval and Transition Houses (OAITH) is a 57-member Association primarily of first stage emergency shelters for women and children escaping violence.

We are aware that many groups and coalitions advocating housing reform have contributed to the current consultation process and we share their goal to increase affordable housing availability and accessibility. Housing reform advocates will already have provided extensive statistical data and analysis to the consultation process. This submission builds on that information and addresses a perspective not often fully addressed in other submissions, but critical to responsive social policy on housing.

We believe the unique housing needs of women and children must be a high priority in any affordable housing strategy. Moreover, any effective affordable housing review must consider the impacts of violence against women on women's housing needs and access.

Background

Since its inception, OAITH has seen housing access and affordability for abused women as a priority issue because it remains a priority for women. Without housing, women must remain with or return to abusers—or become homeless. Homeless women experience up to 10 times the death rate of housed women.¹ Given the deterioration in housing availability and access since the mid-1990s in Ontario, women's housing 'options' are increasingly unstable and unsafe, giving rise to discrimination and harassment in many situations.

Violence becomes both the cause of homelessness, and the result. Miloon Kothari, UN Special Rapporteur on adequate housing, in reports to the UN, has identified the need for housing programs and strategies that focus on housing for women, and in particular for women facing multiple forms of discrimination and vulnerability. He has noted the link between violence against women and housing, for example, saying: "...the reciprocal relationship between violence against women and women's adequate housing can make women more vulnerable to various forms of violence and, conversely, violence against women can lead to the violation of women's rights to adequate housing."²



For OAITH and its membership, therefore, any proposed strategy to address affordable housing must be of critical interest and concern. And we believe it is vital that government hear our voice and the

The government needs to see that we need more financial support. We are not trying to sit on the system and get a handout. We are trying to start over. If they knew how hard it was to get help and how badly you are treated when you ask for or receive it, they would get that this is not fun for us.
—Violence survivor

We really need more affordable housing. I think one of the reasons a lot of women (especially ones with children) stay in bad relationships is they have no place to go, or the places they can afford are run down and not safe for the woman, let alone the kids.
—Violence survivor

unique concerns of OAITH and other women's housing advocates in the current affordable housing review and future housing policy development.

In its 30-year history, OAITH has participated in a number of opportunities to review/ improve Ontario housing policy.

- The introduction of the Special Priority Policy for abused women.
- Response to the Harris government withdrawal from social housing and the subsequent *Tenant 'Protection' Act* of 1998.
- Response to the housing consultation of the Harris government.
- Legal standing at the 2002 inquest into the death of Gillian Hadley, murdered by her partner, in which availability and access to social housing became a factor in her inability to escape.
- Response to the current government Affordable Housing Strategy for Ontario consultations in 2004.
- Response to the Social Housing Policy Review of 2006.
- Participation in the "stakeholder work group" which undertook a review of the Special Priority Policy throughout 2005 and 2006.
- Numerous meetings with and reports to governments of different political parties with regard to the housing issues experienced by abused women and their experience of poverty, which is inextricably bound to housing access.

OAITH's frontline perspective on the impact of housing policy on women makes us well-placed to provide a long-term picture of how housing policy in Ontario has helped—and hurt—women and children. It has also provided us with a view of progress on housing issues for women that is sobering.

1989 to 2009—What have we done?

In November 2009, the women's anti-violence community in Ontario and the Ontario government both marked the 20th anniversary of the December 6th, 1989 Montreal Massacre of 14 women at l'École Polytechnique, a date that now marks the National Day of Remembrance and Action on Violence Against Women in Canada.

To mark this sad anniversary, we asked all Ontario MPPs to make a personal commitment to work with women for an end to violence against women. All three current parties have made that commitment.

It is at a time like this that we look back to review and reassess our progress on our mutual goal to end violence against women. So it is appropriate that we also take that approach to the current affordable housing consultation in assessing where we have come from and what lies ahead for future housing for women in Ontario.

(Women need) easy access, treat women with more respect. More access to funds for things you need to keep you safe. It is hard enough to leave, but when you are treated with so much paperwork, degraded and denied the funding you need, which you're thankful for, but it never covers everything. It makes you question why you left or it makes it impossible to leave. And this is why a lot of lives are lost, because help is not there, or just impossible or painstaking to get. It is degrading enough to ask, let alone go through so many hoops.
—Violence survivor

I was told that I needed to find an apartment that was \$350.00 a month all included. All I could find for that kind of money was a room. It was dirty and shared a bathroom with three other people. I feel so degraded. I never thought I'd have to live like this.
—Violence survivor

of the top three concerns for women's shelters across Canada, including in Ontario.

Women's shelters have a frontline view of issues for thousands of women and children struggling to free themselves from violence. To support them, Ontario needs strong, visible and decisive provincial action on an affordable housing strategy for Ontario that goes beyond the positive initiatives of the past.

While progress has been made since the 1990s, not enough has changed in the past 20 years, nor even in the last five years. To illustrate the point, we want to compare the housing issues for abused women and their children in 1989 to those reported by our membership in 2009, 20 years later.

In 1989, OAITH began a practice of writing yearly reports for government for presentation during November Woman Abuse Prevention Month (then called Wife Assault Prevention Month).

These reports typically focussed on the most urgent areas of concern related to provincial government policy and programs for that year. In 1989, our report centred on three areas: family law, criminal law and housing issues.

20 years ago: housing issues for women in 1989

In preparation for our 1989 annual report, OAITH created a survey for members on current issues, in which housing needs of women were included. For abused women looking for accessible, affordable housing 20 years ago, OAITH reported⁴ a number of issues that will be familiar:

- It was almost impossible for low-income women to find private rental market housing because available units were priced well beyond what was then General Welfare Assistance rates.
- Subsidized housing was limited. Despite a new policy giving abused women priority on housing lists, women were forced to wait in shelters—sometimes up to six months—until housing became available. Or return to an abusive partner.
- Women faced discrimination because they were leaving abusive relationships. They also faced discrimination as a result of being forced on to social assistance. And because they had children. And because of their race or cultural background or facility with English. In 1988/89, the Centre for Equality Rights in Accommodation (CERA) reported that 68% of complaints about housing discrimination filed with them were from women; some grounds cited for the discrimination by the women included family status, marital status and receipt of social assistance⁵.
- Shelters warmly welcomed the priority for abuse implemented in 1986 for women leaving abusive relationships; the policy was evaluated and continued in 1988. At that time, approximately half of women in a six month period received the housing they needed. Shelters wanted an expansion of the definition of abuse to include forms of emotional abuse and to add women without

The only area that women can afford is unsafe and women are then victimized by sleazy landlords. The area is also often targeted by drugs and crime.
—Women's advocate
(Central Ontario)

Women must provide proof of custody to be eligible for extra bedrooms. Women often do not have formal or full custody and live in very small apartments that are not suitable for larger families.
—Women's advocate
(Eastern Ontario)

Women with four or more children find it difficult to find adequate housing. Many women have filed for bankruptcy after leaving an abusive relationship, making it difficult when credit checks are required for market rent.
—Women's advocate
(East Central Ontario)

children to the eligibility criteria; these changes were eventually granted. But the evaluation showed that some housing personnel would not accept verification of abuse from a women's shelter and a guideline to offer housing within three to four weeks was not followed because of limited housing availability.

Throughout the period between 1989 and 2009, OAITH has continued to raise housing as a critical support for women, both in the short and long term. We have also continued to make the links between poverty, inequality and violence as a determinant of housing access for women and children leaving abusive situations.

Time after time

In 2004, OAITH again surveyed members for a report to the new Liberal government of Ontario on issues concerning abused women and their children⁶. We found that since 1999, 10 years since the 1989 survey:

- 92% of shelters answering the survey reported that social assistance rates were a factor in women's decision to remain with or return to an abuser, and housing affordability for women was severely limited.
- 90% of reported that housing accessibility was a factor in women's decision to remain with or return to an abuser; 44% reported lack of housing was factor "most of the time".
- Wait times for receiving subsidized housing, even with priority status, had increased since 1999.
- Not surprisingly, over half of shelters also reported longer shelter stays for women with some shelters reporting over six months stays (the original guideline for shelter stay in Ontario was set at six weeks).
- Interpretations of the eligibility and process for the Special Priority Policy varied across the province, with shelters generally reporting that eligibility criteria for the priority list was tightening and requests for multiple verifications of abuse were increasing.

As years passed, housing accessibility and affordability was deteriorating rather than improving. Additional housing support for women was also diminishing and abused women seeking supports set up for them were made to feel as if they were abusing the system.

Housing issues for women in 2009

In preparation for this submission, OAITH revisited the concerns of abused women in shelters with regard to housing in Ontario. In November, we distributed an online survey to 55 member agencies of OAITH to explore a range of housing concerns women had identified in the past and to identify changes over the recent five year period since our 2004 review. We received 32 responses from members in all regions of Ontario.

All of the responding shelters employed a Transitional Housing and

Women are staying longer in subsidized housing as there is a lack of affordable market rental housing.

***—Women's advocate
(Central Ontario)***

Working women in subsidized housing have often said that they would be better off on Ontario Works as they are paying rent based on gross income plus utilities, leaving them with not enough funds to pay for food and clothing for the children.

After paying for daycare, transportation and other related employment costs, they feel they are left with less than a woman on Ontario Works. Rent needs to be based on net income or there needs to be help with utilities.

Many women cannot even afford a phone.

***—Women's advocate
(West Central Ontario)***

Support Program worker. The THSP was designed to provide “transitional” supports for women in the community in order to facilitate their escape from abuse. In particular, the program guidelines for the transitional support worker funding focus on helping women find and maintain housing. These workers have detailed knowledge of housing conditions for women and children in their communities.

Shelters responding to our November survey reported that requests for shelter space have increased for most of our members over the past five years.



Sixty-nine percent of shelters in our survey reported an increase in the number of women seeking shelter. One-quarter reported that the number of requests for space was unchanged, and only 6% reported a drop in numbers of women seeking

shelter. Housing issues for women remain a priority for frontline workers in women’s shelters, as they have for the past 20 years.

Access to housing

Access to housing for abused women in Ontario has decreased in the majority of communities where survey respondents were working. Almost two-thirds of shelters responding to our survey reported that housing has generally decreased in the last five years in their area. For another 18% housing access had remained the same and for 21%, housing access had increased.

Shelters identified that particular groups of women are less likely to be able to access appropriate housing than others after leaving a shelter. Specifically, single women, women with large families and seniors have difficulty finding suitable housing or a subsidized housing unit to fit their situation. One size does not fit all.

Shelters also noted that women whose abusive partners may have controlled payment (or non-payment) of rent or created damage in a previous housing unit had been prevented from obtaining housing and held responsible for arrears despite their partner’s behaviour and control. Under social housing guidelines, they are prevented from accessing subsidized housing while arrears are active and they are held accountable for the violent partner’s actions. Women have also faced barriers because child custody arrangements or because their children are in the temporary care of child welfare, which affects placement in subsidized housing.

More women (outlined below) face one or more forms of discrimination that shut the door on housing that is available—just not for them.

*Many of the women I work with have arrears with housing providers. If a woman is in housing with an abuser and moved out, leaving arrears and damages, both parties are responsible...however, should she decide to leave the abuser and apply to housing, the following will happen: a) she becomes fully responsible for the total arrears, b) an arrears agreement is no longer an option, c) the total of the arrears must be paid in full before any housing provider will entertain putting the woman fleeing abuse on the priority list, or any list for that matter. Clearly no understanding...who did the damage? Likely the abuser. Why was the rent not paid? Likely the abuser’s control...sigh...
—Women’s advocate (Eastern Ontario)*

*Units are occupied for life as families’ resources do not improve due to lack of services and opportunities.
—Women’s advocate (Central Ontario)*

Waiting time

Wait times for subsidized housing continue to be a serious problem.

Five years after our 2004 report of increasing wait times for abused women, shelters are again reporting wait time increases for

subsidized housing generally. Seventy-three percent of shelters answering our survey said wait times for subsidized housing had increased in their area over the past five years, while 27% reported that wait times were unchanged. No shelters reported a decrease in wait times for subsidized housing.

In addition, wait times for woman to be approved for priority placement for housing have also increased, according to 42% of the shelters responding to our survey. For an almost equal number of shelters, the wait time for approval hadn't changed and for 15% of shelters wait times for approval had decreased.



Top housing issues for women leaving shelters

Although there have been some positive initiatives taken in the past specifically to support women, they have clearly not adequately eased the transition of women and their children out of violent situations. Women still face a sadly familiar list of housing issues that create barriers to their escape.

Shelters prioritized these concerns from a list of issues reflective of previous work by OAITH with the following results:

- 1. Lack of subsidized housing:** Lack of low-income housing was number one on the list of housing issues raised by our members, echoing the same concerns from women 20 and 10 years ago. While the priority policy and subsidies to support rental costs are beneficial to women, lack of housing units still leaves them searching for a home.
- 2. Inadequacy of shelter allowances:** Number two in the priority list of issues. As noted in many submissions in the affordable housing consultation process, the shelter portion of the Ontario Works and Ontario Disability Support Plan often falls far short of average rents and fails to meet actual rents anywhere in Ontario. Women face the now common and desperate 'choice': Food or shelter? In the face of this reality, women also make the 'choice' to return to, or remain with, an abuser.
- 3. Lack of available rent supplements and housing allowances:** While programs to reduce shelter costs are helpful, there are not enough of these supports available across Ontario. Shelters find

Increase OW/ODSP rates; increase employment options for women so that women don't have to live in subsidized units but could afford market rents. I would like to see more rent supplements...women should be able to live in the area of their choice.
—Women's advocate
(West Central Ontario)

Some of the rent subsidy landlords do not have an understanding of the impact of abuse—especially on finances, where it would impact a woman's credit rating. More education with landlords, both private and social housing, would be beneficial.
—Women's advocate
(Eastern Ontario)

that it is difficult for women to get the supplements and allowances, despite a percentage of some subsidies being designated for “domestic violence.” In addition, where supplements and housing allowances are approved, the level of subsidy does not cover true costs of shelter, so that women are still faced with profoundly bitter choices that affect the safety and well-being of the woman and her children.

4. **Cost of market rental housing:** Shelters report that few women can afford market rental rates in Ontario. Coupled with the relatively small number of rent subsidies and allowances, market rental housing becomes out of reach for most abused women unless they drastically lower the standard of housing they seek.
5. **Lack of housing units generally:** Shelters report that in some areas, there is little rental housing available of any kind, whether or not it is subsidized. In smaller and Northern communities or those in which there are long waiting lists, families will wait years to find appropriate housing, or may be forced to keep moving around in order to find a place to live.

In addition to the top five housing concerns for women, OAITH members also identified a number of additional pressing issues:

1. **Discrimination:** As recognized by the Ontario Human Rights Commission,⁷ the Centre for Equality Rights in Accommodation (CERA),⁸ and research commissioned by Canada Mortgage and Housing Corporation⁹, housing discrimination against women by landlords is a significant barrier to housing access, even when units are available. Shelters in our membership echoed the above reports in working with women escaping violence. Abused women particularly affected by discrimination by landlords include: women with children, women on social assistance or unemployed, newcomers to Canada, Aboriginal women, women with disabilities, racialized women and transgendered women. Women also face discrimination because they are leaving an abusive relationship. Clearly, many women face multiple, intersecting forms of discrimination that together form an impenetrable barrier to their escape.
2. **Location of housing:** For some shelters, particularly in rural or Northern communities, subsidized housing may be located far from the services women need to address the violence in their lives and to rebuild. Often they live in poverty and are unable to afford public in the face of this reality transportation—if it exists in the location they live. Conversely, some women’s safety is compromised by housing that is too close to municipal activity where partners may easily find women. The issue for women is availability of housing where they can make meaningful choices that correspond to their need for both shelter and safety.
3. **Condition of housing:** Shelters continue to report that women leaving abusive situations are often forced into substandard and unsafe housing ‘options’ that may still be unaffordable. The state of disrepair to many subsidized housing units is now well-known and new initiatives to upgrade and repair these units are very welcome, although currently not equal to the task.

*We are a very small rural community. As a second stage housing provider, we are actually the second largest provider of social housing in our community —and we have six apartments and one house!
—Women’s advocate
(East Central Ontario)*

*In this region, definitely young Anishinabek women with children are the most discriminated against, as well as women who are on OW/ODSP and women who have more than one child.
—Women’s advocate
(Northern Ontario)*

*(We need) more safe units within towns on Manitoulin Island where women can walk to access services and children are close to local schools.
—Women’s advocate
(Northern Ontario)*

4. **Special Priority Policy issues:** Several years ago, a multi-year project was undertaken by the Ministry of Municipal Affairs and Housing to review the Special Priority Policy for victims of abuse. The Special Priority Policy for abuse (O. Reg. 298/01 and O. Reg. 339/01) within the *Social Housing Reform Act* has been a strong support initiative for abused women and their children, allowing many women to receive housing in a shorter period of time in recognition of the dangers they face. There are, however, continuing and apparently increasing concerns by shelters about the way in which this policy is interpreted and applied. We will expand on this issue further below.

Negative impact of lack of housing on women escaping abuse

Taking particular note of violence against women, as well as the impact of it on their children, is critical within the “people-centred” affordable housing plan outlined in the housing consultation document. Without it, impacts of violence are increased, women and children are rendered more vulnerable to further abuse and the messages of abusers are reinforced systemically.

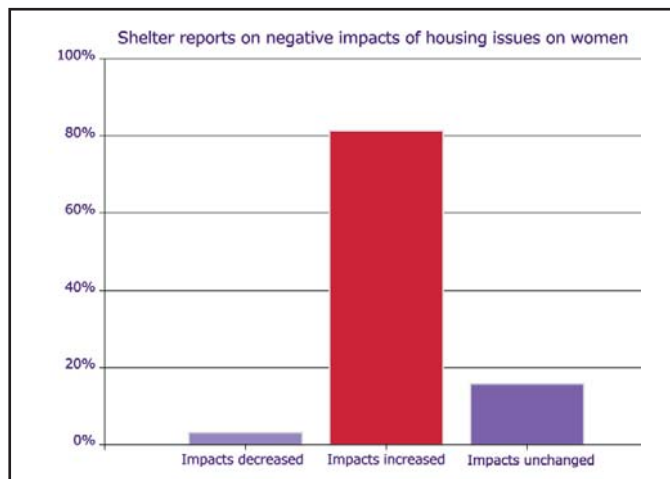
Quite simply, women are in danger if they are unable to secure safe, affordable housing in a timely way. Women have died as a result.

In addition, forcing women and children into substandard and unsafe housing as an exit from violence attaches further stigma to women who are already facing poverty and unbearable levels of insecurity and stress.

Unhealthy, unsafe housing also exposes women and children to risk of child welfare involvement and the potential for apprehension of children deemed to be experiencing ‘neglect’. On the other hand, if women return to partners who are abusive, they are also subject, under recent child welfare practice in Ontario, to intervention on the grounds that the children may be exposed to violence. The already difficult situation of women becomes completely intolerable in these circumstances.

Rebuilding a life of safety and empowerment under such circumstances is miraculous. Many women achieve this miracle, but it is a sad society that urges them to leave abusers only to launch them into this ‘no-win’ situation.

We regrettably have to report, however, that according to shelters in our network, the negative impacts of the housing issues outlined above have increased during the past five years. Eighty-two percent of shelters answering our sur-



It is a disgrace to have to offer a woman and her kids a place that I would not willingly house farm animals in and then expect them to get on with their lives.
—Women’s advocate (Toronto)

There is no affordable market rent housing units available that are safe, and therefore, outside of priority/subsidized housing there is virtually nowhere for women to house their families. Now, there is a waiting list for the subsidy, which forces women to succumb to unhealthy means of providing a home for their families.
—Women’s advocate (Northern Ontario)

vey reported that the negative aspects of housing issues for women had increased. For 15%, the situation was unchanged. Only three percent of shelters said that negative impacts of the housing crisis had lessened for women in their community.

The Special Priority Policy for abuse

The Special Priority Policy was originally developed in 1986 to support women and children escaping abuse as a result of advocacy by women's anti-violence activists and action by government to recognize the importance of housing to women with 'no place to go'.

Since its creation, there have been some improvements made to the policy to be inclusive of different mechanisms of abuse, and the policy has survived as one of the positive initiatives developed by government to acknowledge the place of housing in an effective response to violence against women.

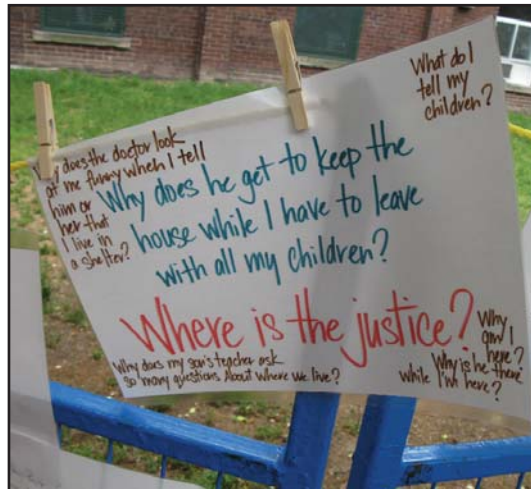
With the abandonment of new social housing development by both national and provincial governments in the mid-1990s, however, the policy has been on uncertain and often eroding ground. In particular, as housing was downloaded to municipal levels, interpretation of the provincial regulation governing the priority and the application of it at the local level created a fairly wide variation of practice with regard to women seeking placement on the list.

While in the past, some shelters reported that local housing managers were supportive and eager to work to protect women, others reported that women were treated suspiciously, that increasing amounts of verification were being sought to prove that women were really abused and that sometimes housing access staff resented women 'taking up all the units' or preventing 'families' from receiving units despite their clear eligibility and the existence of the policy.

Policy review

In 2005 and 2006, OAITH and a number of other women's advocate groups participated in a review of the policy, the purpose of which was "to strengthen the protections provided to domestic violence victims and to improve implementation of the application review process."¹⁰ We expected that the review would reinforce provincial support for the policy and make application of it more consistent.

Over a series of sometimes difficult meetings, women's advocates, housing service managers and government staff worked on revisions. The process revealed the quandry resulting from lack of housing and the impossible task of managing housing waiting lists stretching years into the future. The review process arose partly out



Women living in substandard housing often pay higher utility costs. Women's safety is often jeopardized as they can't afford a phone. Women and children often have increased health issues as a result of substandard/unhealthy housing. Market rent can be cheaper in surrounding rural communities, but women can't consider these units as the cost of transportation via taxi is exorbitant.
—Women's advocate
(Central Ontario)

Fewer women are approved for special priority or other programs. More women give up and return to the abuser or feel obliged to get involved with a potential abuser in order to pay the rent and feed the kids.
—Women's advocate
(Toronto)

of the murder of Gillian Hadley some years earlier and inquest recommendations on housing made by the jury. Shelter advocates sometimes felt, however, that they were struggling to protect the policy itself, rather than working to improve its protections for more women.

In the end, the review became more of a negotiation process with housing managers, but some changes were introduced into the policy that advocates hoped would send a message to housing access managers to be more flexible and supportive to abused women. Advocates were unable to change key elements of the policy that still fail to acknowledge the dynamics of violence against women.

The more things change...

The changes to improve the Special Priority Policy took effect over two years ago. According to our recent survey, however, concerns about interpretation and implementation of the policy continue for frontline advocates working with abused women across Ontario.

Most shelters say that the changes in the priority policy have either not changed access to housing for most abused women (42%) or have decreased it (45%). Only 13% indicate, as we had hoped during the review, that access to subsidized housing has increased as a result of the changes.



A majority of shelters reporting to our survey (58%) also say that, in practice, criteria for eligibility for the priority list has also not changed in their region, although the policy review did make changes to the definition of abuse to include stalking, threatening and other abusive behaviours not included in the previous version of the policy. Indeed shelters report in a number of cases that eligibility continues to tighten as housing managers struggle with local housing wait lists. While we understand that struggle, the solution to long waiting lists is not to eliminate the priority policy protections.

More concerns about implementation of the SPP

Some additional issues mentioned by shelters echo those we heard about the interpretation of the policy in 1999 and 2004, including:

- Continuing ineligibility for women who fall outside the 3-month requirement for submitting an application after leaving an abuser, despite policy clearly providing ability for housing managers to waive the requirement under a number of circumstances, including for example, residing in a shelter.

Right now, very few women are getting priority housing due to municipal interpretation of abuse.
—Women's advocate (East Central Ontario)

The process for applying for the Special Priority Policy is lengthy and drawn out far too long by social housing agencies.
—Women's advocate (Toronto)

They find new ways to restrict women from qualifying and dis-entitle them--eg. criminalization of women who are abused as fraudsters.
—Women's advocate (West Central Ontario)

We know that the Registry tries, but sometimes the level of danger is not truly reflected in the criteria.
—Women's advocate (Eastern Ontario)

- Restriction on types of verification of “co-habitation” with the abuser. One shelter notes that their region accepts only government mail as proof of co-habitation. One shelter reports that in their area, women have even been accused of forging documents and another says that women continue to be ‘criminalized’ and treated like “fraudsters”.
- Continuing requirements for details of the abuse by housing access services that shelters consider intrusive and unnecessary when the agency has verified the women is experiencing violence, as outlined in the policy. When abuse is verified as per the SHRA, additional requirements for women to share their experiences with housing authorities is not necessary and places additional stress on women in crisis situations.
- Housing managers assessing “risk” levels for women and determining priority placement based on their ‘assessments’ despite policy that priority should be determined by date of application.
- Shelters continue to express concerns about requirements of the policy that limit priority placement to women who have been living with the abuser and can prove it, as well as the requirement to apply within three months of leaving the abuser. Based on the reality of danger to women in the first year of separation, in particular, the policy time period reflects a arbitrary cut-off for women seeking priority housing. Shelter professionals know that “co-habitation” with an abuser is also not a reasonable requirement for a policy meant to protect women—a woman can be forced from their current housing by an abuser’s threats whether or not he is living with her. Often, women also have trouble accessing documents to prove co-habitation because her name is not put on the lease by the abuser or because the type of documents required are too restrictive.

Getting it, but not keeping it

Lucky women who manage to find housing after they leave a shelter then move on to the task of keeping it. There remain a number of factors that drive women out of their housing, often to ‘couch surf’ to friends and family, return to an abuser or enter another relationship.

According to our survey, poverty is, by far, the number one reason why women lose the housing they struggle so hard to get. They can’t afford to keep it. In particular, shelters note high hydro and other utilities costs, which are not adequately recognized by income security programs, or covered by the low wages women often earn. Housing may be somewhat more affordable in outlying areas, but women may then be faced with inability to pay for transportation, especially in areas where



It is no longer adequate for our service to just sign off on the form, the social housing provider wants information that is really none of their business.
 —Women’s advocate
 (East Central Ontario)

Much tighter criteria for special priority approval. Those women who want to move out of town often cannot because of the narrow time frame for having left (the abuser). Women who live in small towns/villages can count on meeting the abuser, his family, friends on a regular basis, but getting them housing in another location is fraught with difficulties.
 —Women’s advocate
 (Toronto)

Our region will only prioritize women with physical abuse who demonstrate extreme safety risk.
 —Women’s advocate
 (West Central Ontario)

public transportation is inadequate or non-existent.

Following poverty, violence and stalking by ex-partners also force women out of the housing they have found, so that women are brought back into the shelter system. Needless to say continuing harassment by the abuser is disruptive and dangerous for both them and their children.

Poor quality of housing also results in women being unable to maintain housing. Because of their poverty and the inadequacy of rent supports, women often must live in unhealthy, unsafe and substandard housing where they fear for their safety or where they experience harassment, discrimination and threats of sexual abuse. Women feel humiliated by the stigma of poverty and ashamed for their children.

In the groundbreaking research entitled *Walking on Eggshells: Abused Women's Experiences of Ontario's Welfare System*, women reported that their housing arrangements are insecure and precarious and their poverty extreme.¹¹ Some women described returning to the abusive partner as the "best" decision they could make in their circumstances. Many of the women interviewed were paying all, or almost all, of their social assistance to cover their shelter costs. This despite the poor housing conditions in which they are forced to live.

Abused women also lose their housing because of eviction, job loss and discrimination against them as mothers, low-income women, survivors of violence and women experiencing discrimination based on inequity: Race, culture, immigration status, ability, sexual identification, age and language.

Working together

As mentioned, all of the shelters that responded to our survey had staff in the Transitional Housing and Support Program. This funding comes with a requirement that the agency have a working relationship and agreement with the local housing access office. The agreement is meant to build positive coordination and communication between the housing and violence against women sectors.

In our survey, however, ease and flow of communication with the housing sector seems uneven. We asked our survey respondents for the number of "rent supplements" available and in use in their areas specifically for women escaping violence. We were seeking an update on the 500 'domestic violence' supplements announced in the 2005 Canada-Ontario Affordable Housing Program.

Efforts to gather this information in various communities, however, were largely unsuccessful. Calls were sometimes not returned, information wasn't available or housing workers were unsure themselves about the designated supplements for 'domestic violence'.

It would appear that the local status of this beneficial program for women and their children is not well conveyed to the violence against women services where women seek help, and in some cases poorly understood in the housing access offices. The implementation of a program such as the rent supplement program is an ideal

In the GTA there are rent supplement and housing assistance programs. Women must wait to be denied for special priority approval before they can apply for rent supplement. Only then can they begin the application process. Then the whole process begins over again. This can mean as much as four months before a woman gets any kind of approval. There is a much longer waiting time for rent supplement program than special priority. I have not had one woman qualify for the housing assistance program, or if she has, the diminishing time frame discourages her. Women want stability after long term upheavals in their lives.

**—Women's advocate
(Toronto)**

More and more verification is required. Some even demand that unless police have laid charges, they will not accept the woman as priority status.

**—Women's advocate
(West Central Ontario)**

example of a pivot point at which housing workers and Transitional Housing and Support workers should exchange information on an ongoing basis in order to best serve women.

If not now, when?

In the past 20 years, how far has Ontario moved toward decent and safe housing for low-income Ontarians, especially for the most vulnerable communities in the province?

Our brief outline of the progress toward safe, accessible and affordable housing for women and children escaping abuse shows that we have come only a few steps forward from the large steps taken back during the mid-1990 rush to cast off public responsibility for social housing.

Positive steps have been taken. Women are grateful when they have the luck to find help with housing and housing that helps them in their escape. At the same time, small steps, however welcome, over a period of 20 years is not adequate or defensible to the thousands of Ontarians scrambling for decent housing or forced into the unsafe, rundown and unhealthy living conditions where many women and children live. Women should not have to choose between a violent home and no home at all.

Looking back over OAITH's periodic updates on housing as a critical element of escape for women, the picture is disheartening. Overall, in terms of availability, accessibility and adequacy, there is just too little difference between what women were facing in 1989 and what they face today in 2010.

We all know more needs to be done. The question is when? Women can't wait another 20 years for a little more movement. We need it now. In our recommendations below are our suggestions on how to go forward.

People can say lots of things to you, but how can you trust them or believe them? Actions speak louder than words! People need to stop saying things and start doing things.

—Violence survivor

You can ask all the questions and interview all the victims, but action is what people need.

—Violence survivor

Recommendations

There have been many excellent recommendations already proposed to guide the housing strategy process, especially those of the Wellesley Institute, Campaign 2000 and the Ontario Housing Network, to name only a few. We support those recommendations.

In addition, we want to suggest some recommendations for specifically supporting women and children who need safe, adequate and affordable housing in order to escape violence.

The Government of Ontario should in response to this consultation:

1. Develop a long-term strategy for ending the housing crisis in Ontario that includes:
 - a. Housing construction targets and a timeline over no more than 10 years to build safe, adequate, and low-income housing for the most vulnerable and underhoused Ontarians.
 - b. Designated, ongoing government funding that is earmarked for housing development and support programs in every provincial budget.
 - c. An equity-based, anti-racist/anti-oppressive framework to guide the work of the Strategy that addresses issues of housing discrimination against renters that have been raised by the Ontario Human Rights Commission and others. An equity-based framework would require all government funded housing and housing development to include accessibility plans, designated units for low-income Ontarians, child-friendly housing and housing that is secure and safe for women and children and close to schools, transportation and necessary community services.
 - d. Annual reporting to the Legislature on progress on housing development targets and timelines.
 - e. An approach to housing that creates mixed income communities in a variety of housing plans, including RGI housing units in mixed income housing, non-profit and co-op housing.
 - f. An interministerial link to the Poverty Reduction Strategy process that merges true costs of housing for low-income Ontarians into the poverty reduction action planning.
 - g. A supportive housing plan, including community-based supports, to provide supportive, accessible housing for Ontarians who require assistance to maintain housing stability.
 - h. Ongoing consultation with low-income Ontarians in local communities with regard to future development of housing to meet the specific needs of these communities.
 - i. Innovative programs such as mortgage subsidy programs to sustain low-income Ontarians in their homes and create opportunities for renters to build toward owning their housing rather than continuing to pay subsidized rent to private landlords.
2. Increase social assistance rates to ensure that social assistance recipients can afford at least the average rent in their local community as well as costs of utilities.
3. Develop a strategy to subsidize market rents through a program that ensures no low-income renters spend more than 30% of their net income on housing. Administratively, it makes sense to consolidate the several subsidy programs currently banded-ing rent cost short-falls in a plan that addresses the needs of all low-income renters unable to maintain their housing.
4. Create a repair and rehabilitation plan for social housing in Ontario, with targets and timelines, to repair and upgrade current public housing projects that are in desperate need of repair.
5. Strengthen the *Residential Tenancies Act* to prevent landlords from raising rents unreasonably when tenants vacate and which applies these rent increase regulations to new buildings.

Recommendations to support women escaping violence

1. Ensure that new housing developments include considerations of security and safety for women and children in their external and internal design. Support developments that can show how safety and security will be built into the design. Ensure that housing developments are child and youth friendly; that is, that they have adequate play space that is safe and easily monitored and that they are easily accessible to public transportation, schools and community recreation centres.
2. Include within any provincial housing strategy a plan for second stage housing for women escaping violence and supportive housing for women who have experienced violence, addiction and mental health issues, housing discrimination and who may require additional support (eg. some women with disabilities and elderly women).
3. Develop a 'Housing and Human Rights Action Plan' for Ontario to address discrimination by landlords against women with children, racialized communities, Aboriginal people, newcomers to Canada, youth and low-income communities. Included in the plan should be both support for enforcement of housing access rights and education for landlords and tenants on housing rights.
4. Increase the number of rent supplements and housing allowances that are designed for 'domestic violence'. Given that the majority of low-income Ontarians are women and a significant number of them are women who have experienced violence, designation of more subsidies to abused women is not an unreasonable expectation.
5. Ensure that all women's shelters in communities where rent supplements and shelter allowances are in place are kept informed of the number and availability of such subsidies so they can better support women leaving shelters to find housing. Provide an annual report to the Ontario Association of Interval and Transition Houses (OAITH) with regard to the status of the designated rent supplements for 'domestic violence'.
6. Actively monitor the implementation of the Special Priority Policy for abuse to ensure that the goal of protecting women and providing timely, safe housing for them is maintained consistently throughout the province. In particular, it is vital that the Province ensure that local housing managers use their discretion to expand housing access to women, not limit it.
7. With regard to the "co-habitation" requirements and the three-month time limit for application for the priority list, local managers can and should be reminded that the flexibility written into these sections of the regulations are there to enable local housing offices to better support women, rather than to exclude them from the priority list. Training on the intent of the policy is apparently needed and should be provided to housing staff.

Conclusion

OAITH is pleased to have this opportunity to contribute to the affordable housing consultation process. We would be happy to meet with the housing ministry at any time to further discuss our recommendations and the concerns of women leaving abusive situations.

Respectfully submitted,

Eileen Morrow, Coordinator



On behalf of the Ontario Association of Interval and Transition Houses (OAITH)

Phone: 416-977-6619

Email: oaith@web.ca

Endnotes

- 1 Kappel Ramji Consulting Group, *Common Occurrence: The impact of homelessness on women's health*. Toronto: Sistering, A Woman's Place/Brown Books Inc. 2001)
- 2 Miloon Kothari, Special Rapporteur on adequate housing. *Economic, social and cultural rights: Women and adequate housing*. Report to the UN Commission on Human Rights, February 26, 2006.
- 3 Sauve, Julie and Burns, Michael. Reported in *Residents of Canada's Shelters for Abused Women 2008*. Juristat, Statistics Canada. May, 2009.
- 4 OAITH. *Stop Violence Against Women: Background Report, Annual Lobby*. November, 1989.
- 5 Centre for Equality Rights in Accommodation, Women's Housing Program. *Women and Housing in Canada: Barriers to Equality*. March 2002.
- 6 OAITH. *Choose to Change This: Women and children more at risk*. November 2004.
- 7 Ontario Human Rights Commission. *Right at Home: Report on the Consultation on Human Rights and Rental Housing in Ontario*. May 28, 2008.
- 8 Centre for Equality Rights in Accommodation. *Measuring Discrimination in Toronto's Rental Housing Market*. July 2009.
- 9 Canada Mortgage and Housing Corporation. *Housing Discrimination Against Victims of Domestic Violence*. Socio-economic Series 06-010. Research Highlights. July 2006.
- 10 Housing Policy Branch, Ministry of Municipal Affairs and Housing. SH Notification 07-05. Subject: *SHRA Regulation changes to Special Priority Policy provisions effective August 1, 2007*.
- 11 Janet Mosher, principal investigator. *Walking on Eggshells: Abused Women's Experiences of Ontario's Welfare System*. York University. April 2004.