



Response to the Affordable Housing Strategy Stakeholder Consultations

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

December 2004

Response to the Affordable Housing Strategy Stakeholder Consultations

Introduction

OAITH would like to begin by thanking the Ministry of Municipal Affairs and Housing for the opportunity to participate in the consultation on an Affordable Housing Strategy for Ontario. The Ontario Association of Interval and Transition Houses (OAITH) is a 73-member Association primarily of first stage emergency shelters for abused women and their children. We met with officials of the Ministry on Thursday, December 16th, to discuss our responses, and are pleased to reinforce our comments at the meeting with this follow-up response.

We believe that the housing needs of women and children, *in particular*, should be a priority in any Affordable Housing Strategy. It has been well documented that women do not enjoy economic equality in Canada, either with men, or among themselves. Employed women still earn considerably less than men in Canada, making 64% of the earnings of men with jobs. Aboriginal women, immigrant women and women of colour fare even worse, often earning less than half of the earnings of women generally.¹ Women with disabilities also experience economic disadvantage—the poverty rate for women with a disability is twice that of women without a disability.²

Women also continue to make up the large majority of lone parents. In 1996, women headed 83% of all one-parent families, a figure that has remained relatively constant since the mid-1970s.³ Women who separate from their male partners experience reduced economic circumstances and low incomes, especially if they have children, since women remain the primary caregivers of children in Canada, regardless of family court decisions that may order joint custody. For many of these women, poverty is increasing. The 2004 report of Campaign 2000 states that the poverty rate for female lone parent families has risen above 50% for the first time in three years.⁴ Their continuing economic disadvantage is further aggravated by the lack of affordable and subsidized, quality regulated childcare that would allow them to continue education and training, or maintain employment.

According to the Centre for Equality Rights in Accommodation, there has been an unprecedented rise in women's homelessness needs in the 1990s and this rise "needs to be understood in the context of fundamental economic and policy changes effecting women rather than solely of vacancy rates and housing availability. While affluent groups in Toronto experienced dramatic increases in income and wealth during those years, women's income has been seriously eroded".⁵ In its report, *Women and Housing in Canada: Barriers to Equality*, CERA also outlines the additional barriers in both affordability and equal access to housing facing Aboriginal women, young and older women, women with disabilities, immigrant women and women of colour.

Housing for Woman Abuse Survivors—Availability and Affordability

To break away from an abusive partner, the majority of women, whether or not they are lucky enough to find space in a women's shelter, will need safe, permanent affordable

housing for themselves and their children. Most abused women will experience an exhausting and often fruitless search for housing, since most of them will experience a dramatic drop in their economic circumstances. Many will be forced on to social assistance. Many will be forced to choose between a violent home and no home at all.

According to women's shelters across Ontario, the two biggest systemic barriers to women and children escaping violence are inadequate income assistance and lack of affordable housing. In an anecdotal report released to the Ontario government in November 2003, entitled: *Choose to Change This*, 90% of shelters reported that women were making decisions to either return to or remain with abusers because they could not pay for both housing and food for their children.⁶ Eighty percent of shelters said this was true for women in the shelter either 'most of the time' or 'often'.⁷

A recent ground-breaking research report on the experiences of abused women on welfare in Ontario also identified the lack of affordable housing as a key reason why women interviewed for the research did not leave abusive partners, or returned to them. In the report, entitled *Walking on Eggshells: Abused Women's Experiences of Ontario's Welfare System*, women reported that their housing arrangements were insecure and precarious and their poverty extreme.⁸ Some women described returning to the abusive partner as the "best" decision they could make in their circumstances.⁹ Many of the women interviewed for the research were paying all, or almost all, of their social assistance to cover their shelter costs.¹⁰

Women using emergency shelters in Ontario clearly have a concern about the availability, affordability and adequacy of any housing options in their communities as they consider how to escape the violence. Abused women who experience additional barriers of disability, racism and discrimination based on age or immigration status will face unique hardships in accessing and paying for housing.

As mentioned above, women are the primary caregivers of children. Abused women face constant concern and worry about the effect of abuse on their children and their ability to support their children independent of the abuser.

Lack of affordable, safe housing is a concern for women on behalf of their children as well. Many women and children are forced into sub-standard and unsafe housing circumstances. Mothers also face discrimination in housing access because they have children. Women who spend most of their money on housing worry about how they can feed their children. This is clearly a difficult situation for women. Added to it, however, is the fear of intervention by child welfare, a fear well justified.

In November 2001, the Centre for Urban and Community Studies released a report that confirms, for example, that housing was a factor in the admission to care of 1 in 5 children in Toronto, an increase 18% between 1992 and 2000.¹¹ On the other hand, if women return to partners who are abusive, they are also now subject under new 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 unbearable in these circumstances.

Accessibility and affordability of safe housing for abused women and their children can make the difference between losing or keeping children, and between life and death for some. The results of any consultation on Affordable Housing in Ontario will have an impact on whether or not women escape. In looking at how to provide Affordable Housing, the Ministry must take into account not only the development of units, but also issues of poverty and unequal access for women and children, since lack of affordable housing is inextricably linked to their poverty. The Ministry Affordable Housing Strategy must make this link and address both of these issues.

Subsidized, non-profit and co-op housing unit development

Numerous reports and studies have called for governments to provide more subsidized housing specifically for abused women and their children. The *Walking on Eggshells* report mentioned above recommends that more subsidized housing be built to address the housing needs of abused women and their children and to support women to stay free of abusive partners. A similar report published by Women Today of Huron, entitled: *Woman Abuse and Welfare in a Rural Community: Rural Women Speak About Their Experiences of Ontario Works*, makes the same recommendation regarding women in rural communities.¹²

A 2003 report on the experiences of women of colour in Toronto, *If Low Income Women of Colour Counted in Toronto* recommends the development of subsidized housing.¹³ *Have a Heart(h)—Living in Fear of Going Hungry: Abused women: Homeless and at Risk of Being Homeless*, an Ottawa research report published in 2002 also calls for more low-income and subsidized housing units.¹⁴ The national bi-annual survey of women's shelters across Canada, *Canada's Shelters for Abused Women, 2001/02*, finds that one of the top three issues for women's shelters nationally is lack of subsidized housing for women departing emergency shelter.¹⁵

The Annual Report of the Chief Coroner: Case Reviews of Domestic Violence Deaths, 2002 identifies the need for affordable, alternative housing as a factor in ensuring women's safety and reducing risks of murder by the abusive partner.¹⁶

The inquest jury in the murder/suicide death of Gillian Hadley determined that the lack of affordable, safe housing was a factor that contributed to her risk and that its availability could have provided her and her severely disabled child with increased safety and security.¹⁷

Recommendation 1:

In light of all these repetitive recommendations, regardless of whatever other initiatives are taken in the Affordable Housing Strategy, **the 20,000 housing units promised by the current Ontario government across the province must be priority number one and the creation of these units must be expedited. Moreover, these units must be considered only the first step in addressing the crisis in housing.** It will take many

more than 20,000 units to begin to address the critical shortage of affordable housing that has grown over the last decade.

Specific needs of women in housing development

Beyond the physical availability of housing for women and children, any housing built by the Affordable Housing Strategy must take into account the specific material conditions of women's lives. In addition, it must respond to the differential barriers of different communities of women, such as marginalized women and mothers.

Recommendation 2:

Options supported by the Province of Ontario must be:

- Housing that is safe and secure. The Affordable Housing Strategy must ensure that in the planning, design and operation of new housing units, safety and security features are included. Some of these may include, but are certainly not limited to security devices, secure entrance and exits, parking design that is secure, safe locations of housing developments, and so on.
- Housing that is welcoming to women without private transportation or adequate incomes. Some essential elements of this aspect include location of housing close, or with easy access, to community and health services, public transit and businesses that cater to basic needs, such as food.
- Housing that is child friendly. Consideration must be given to children's needs, such as ability to play freely, access to schools and playgrounds, and other children. In addition, housing must recognize the needs of women with more than one or two children who currently find it particularly difficult to find both subsidized and low-income market rental housing.
- Housing that accommodates the needs of women with disabilities and Deaf women, including women with invisible disabilities. The Ministry of Municipal Affairs and Housing should consult further with the Disabled Women's Network of Ontario (DAWN) with regard to the specific needs of women with disabilities and Deaf women.
- Housing that is free of all forms of unequal treatment and discrimination. Housing workers must be trained to provide equal response to women from marginalized groups and their children in any housing access situation, including women who have been abused.
- Housing that includes mixed income levels and mixed subsidized and market rental accommodation. The St. Lawrence Market site in Toronto is an example of a mixed environment that could be studied in this regard.

Private market rental

While insufficient subsidized, non-profit and co-op housing exists, women and children will be forced to use private market rental housing. For abused women who are forced on to social assistance, or find themselves trapped into low-paying, minimum wage jobs, market rental housing costs often mean that they will spend much, if not all, of their meagre income on housing, while struggling to feed their children and themselves.

For housing to be affordable for abused women, women need adequate income assistance programs with sufficient shelter allowances, as well as shelter cost supports for the “working poor”, including recognition of cost of living increases and unpredictable increases in costs such as utilities that are passed on to or paid directly by tenants.

Any policy or housing development strategy from government must consider the gender equality rights of women that may be affected by policies that put women at risk of gender discrimination and oppression contrary to the laws of Canada and the Canadian Charter of Rights and Freedoms. Policies and practices that could potentially increase the power of landlords over women and their children should be rejected.

Women have experienced invasion of privacy, loss of confidentiality, harassment and even sexual or physical assault from some landlords in Ontario. Policies that provide more power for landlords over their tenants, such as the rent supplements to private landlords, may contribute to placing some women at risk of harassment. It makes more sense to ensure that women in need of housing allowances have the necessary level of income assistance and access to subsidized housing to facilitate choice of housing where they feel safe and their privacy and confidentiality is protected.

Recommendation 3:

The Rent Supplement Program is not necessarily an ideal solution to affordability for women. It should be re-thought in favour of subsidy programs that support tenants rather than landlords and the commitment to ensure that low-income women and children have sufficient income assistance and housing subsidies that allow them to pay for the housing they need.

Recommendation 4:

Re-establishment of effective rent control in Ontario that crosses all private market rental units across the board.

Waiting Lists

The primary reason for the increasing and unmanageable waiting lists for housing in Ontario is the refusal of governments to build or facilitate the building of new subsidized, non-profit and co-op housing units, coupled with the increasing poverty of low-income people, especially women.

As governments neglect to address the lack of housing and growing poverty, and waiting lists become more difficult to manage, housing managers who have no control over the root of the problem begin to manage the lists by developing ways to exclude eligible individuals. This is certainly the experience of many abused women and their children in Ontario today. While we appreciate the frustration of housing officials in grappling with the long waiting lists, we cannot support the “downloading” of the problem to abused women and their children.

In the past, abused women’s advocates have won the right to a ‘special priority’ for housing women and children who are at risk of woman abuse. As low-income and subsidized housing has become scarcer and waiting lists longer, however, this priority policy has eroded for abused women. The erosion has particularly spiked since the downloading of social housing to local municipalities.

Women’s shelters report many incidences of shifting criteria for eligibility to the priority list and increasing demands for verification of abuse, regardless of the outlined verification rules in the *Social Housing Reform Act*. In some cases, shelters have reported victim-blaming attitudes and practices against abused women who have applied under the priority policy, and of housing officials who have complained that abused women are “taking up all the units”, as if they are not deserving of housing regardless of the danger they face and their eligibility. In some communities shelters report that verification of abuse by a women’s shelter will not be accepted, despite the inclusion of women’s shelters on the list of community agencies considered legitimate verifiers in the *Act*.

Some housing officials have also eroded the special priority for abused women by broadening the definition of abuse to increase the numbers of individuals who can claim a priority status, as well as creating different levels of priority in a sort of ‘sliding scale’ of violence. The three-month rule for abused women to have physically lived with the abuser continues to exclude many women from the priority list, including women who have entered second stage temporary housing who may no longer be considered eligible for permanent housing as a result of this rule.

OAITH has been invited to participate in the parallel working group on the Special Priority Policy, so we will not go into all of the issues arising from the erosion of the policy in this response. In concluding this section, we will only add that housing service managers and housing providers that are not specifically providing housing for women or abused women are currently not sufficiently educated on the dynamics of violence against women and the hardships that most abused women face after they attempt to escape the violence. In addition, while we fully support training of housing workers throughout the province, even basic anti-violence training cannot provided the in-depth education that is required to set policy and practices to be fully responsive to the complexities of violence against women. Therefore, housing officials are not well placed to determine or amend priorities. These are rightly within the expertise and area of violence against women sector services and women’s advocates and should be consistent province-wide. In addition, training on the dynamics of violence against women is best provided by women’s anti-violence sector advocates,

Recommendation 5:

It is critical that the Province of Ontario strenuously protect the special priority for abused women by further strengthening the policy and by insisting that, in the meantime, housing managers follow current regulations progressively. Compliance should be monitored and managers who refuse to comply should be held accountable within the mechanisms of the *Act*. Service managers and housing providers that do not provide supportive housing specifically for women should not be setting priorities with regard to violence against women issues, or deciding how supports and services for women experiencing violence will be delivered.

Recommendation 6:

Housing providers and service managers should be liaising and working with local women's advocates and shelter workers who have the expertise to support both women and housing workers to provide better response to abused women and their children. These connections can provide ongoing learning and lead to improved service delivery.

Second Stage Housing

Most abused women in Ontario, given the choice between second stage housing and permanent affordable housing, would choose the latter. At the same time, many hundreds of women cannot get into subsidized housing and cannot afford current market rental housing. In addition, many abused women experience additional barriers to housing, such as caring for more than one or two children. Finally, some women leaving an emergency shelter after the six-week guideline for stay have remaining or ongoing challenges and may benefit from a longer-term housing option, albeit temporary. Some examples of these challenges might be ongoing high-risk situations, women who may want to move out of the community after legal issues are resolved, or women who require additional counselling support or help with a number of difficult systemic issues.

Additional second stage housing, including resources to maintain needed supports, was a recommendation of the jury in the inquest into the death of Gillian Hadley.

Recommendation 7:

The Province of Ontario should keep the need for additional second stage units in mind when planning the development of affordable housing *beyond* the completion of the promised 20,000 permanent affordable housing units.

Endnotes

¹ Women in Canada: A Gender-Based Statistical Report. Statistics Canada (2000) Pgs. 141, 203, 230-232.

² Living with Disability in Canada: An economic portrait. Gail Fawcett. Minister of Supply and Services, Canada. Ottawa. 1996.

³ Custody, Access and Child Support: Findings from the National Longitudinal Study of Children and Youth. University of Montreal, National Institute of Scientific Research. Nicole Marcil-Gratton and Celine Le Bourdais. 1999.

⁴ One Million Too Many: Implementing Solutions to Child Poverty in Canada. Campaign 2000. November 2004. Pg.1.

⁵ Women and Housing in Canada: Barriers to Equality. CERA—Centre for Equality Rights in Accommodation, Women's Housing Program. March 2002. Pg. 8.

⁶ Choose to Change This, Ontario Association of Interval and Transition Houses (OAITH). November 2003. Pg.2 and 3.

⁷ Choose to Change This, Ontario Association of Interval and Transition Houses (OAITH). November 2003. Pg.2.

⁸ Walking on Eggshells: Abused Women's Experiences of Ontario's Welfare System. Janet Mosher, principal investigator, York University. April 2004. Pg. 88.

⁹ Walking on Eggshells: Abused Women's Experiences of Ontario's Welfare System. Janet Mosher, principal investigator, York University. April 2004. Pg. 16-20.

¹⁰ Ibid. Pg. 13.

¹¹ One in Five...Housing as a Factor in the Admission of Children to Care. Research Bulletin #5. Centre for Urban and Community Studies. Toronto. November 2001. Pg. 2.

¹² Woman Abuse and Welfare in a Rural Community: Rural Women Speak about their Experiences of Ontario Works. Women Today of Huron. Goderich, Ontario. 2004.

¹³ If Low Income Women of Colour Counted in Toronto. Final report of the action research project, Breaking Isolation, Getting Involved. Punam Khosla. Toronto. 2003.

¹⁴ Have a Heart(h). Living in Fear or Going Hungry. Abused Women: Homeless and at Risk of Being Homeless. Chantal Cholette. Ottawa. 2002.

¹⁵ Canada's Shelters for Abused Women, 2001/02. Juristat. Canadian Centre for Justice Statistics. Statistics Canada—Catalogue no. 85-002-XIE, Vol. 23, no. 4. Pg.11.

¹⁶ Annual Report to the Chief Coroner: Case Reviews of Domestic Violence Deaths, 2002. Domestic Violence Death Review Committee. 2004. Pg.30, 37.

¹⁷ Inquest Touching the Deaths of Gillian Mary Hadley and Ralph Alexander Hadley. Jury Verdict and Recommendations. February 2002. Social Services—Housing, Recommendations 23-30.