

FINANCIALIZATION OF PURPOSE-BUILT RENTAL HOUSING

WRITTEN SUBMISSION TO THE NATIONAL HOUSING COUNCIL

DAWN Canada

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DisAbled Women's Network
Réseau d'action des femmes handicapées

ABOUT DAWN CANADA

The DisAbled Women's Network (DAWN) Canada is a national, feminist, cross-disability organization whose mission is to end the poverty, isolation, discrimination and violence experienced by women and gender diverse people with disabilities and those who are Deaf. DAWN Canada is an organization that works towards the advancement and inclusion of women and girls with disabilities and Deaf women in Canada. Our overarching strategic theme is one of leadership, partnership and networking to engage all levels of government and the wider disability and women's sectors and other stakeholders in addressing our key issues.

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RIGHT TO ACCESSIBLE, AFFORDABLE AND SAFE HOUSING

Housing is a human right defined as “the right to a place to live in peace, dignity, and security”¹ and is enshrined in a number of international instruments ratified by Canada, including the International Covenant on Economic, Social and Cultural Rights (articles 2.2, 3, and 11), the Convention on the Rights of People with Disabilities (articles 28 and 9), the Convention on the Elimination of All Forms of Discrimination Against Women (articles 14 and 16), the Convention on the Rights of the Child (Article 27) and the Declaration on the Rights of Indigenous Peoples (Article 8). The Convention on the Rights of People with Disabilities (CRPD) mandates State Parties to provide an adequate standard of living for all people with disabilities and their families, which includes accessible, affordable² and safe housing and the continuous improvement

¹ Office of the United Nations High Commissioner for Human Rights & UN Habitat. (n.d.). The Right to Adequate Housing. Fact Sheet No. 21/Rev. 1. Available at: https://www.ohchr.org/sites/default/files/Documents/Publications/FS21_rev_1_Housing_en.pdf

² Housing is considered affordable if it costs less than 30% of the household gross income.

of life conditions (Article 28). The CRPD also stipulates that “States Parties shall take appropriate measures to ensure to persons with disabilities access, on an equal basis with others, to the physical environment, to transportation, to information and communications, including information and communications technologies and systems, and to other facilities and services open or provided to the public, both in urban and in rural areas” (Article 9).

However, women and gender diverse people with disabilities, especially those living at the intersections of historically marginalized identities, face specific and heightened barriers to affordable, accessible, and safe housing, caused by the increased financialization of housing in Canada. By not mitigating the negative impacts of the financialization of housing of women and gender diverse people with disabilities living in Canada, the federal government is failing to ensure the right to housing to all people, especially to women and gender diverse with disabilities.

CURRENT HOUSING SITUATION OF WOMEN, GIRLS AND GENDER DIVERSE PEOPLE WITH DISABILITIES

People with disabilities are more likely to live in inadequate housing compared to people without disabilities,³ many have unmet care needs related to their housing situation, and many others are on waitlists for affordable housing. In terms of core housing needs, women with disabilities are more likely to live with core housing needs than people without disabilities and men with disabilities.⁴ Other historically marginalized groups, among which people with disabilities are overrepresented, also face a high burden of core housing need: almost half of recent refugee-led households (49%), 27% renters (27%), Indigenous households, households led by a lone mother (27%), and those who live in Nunavut (37%) live

with core housing needs.⁵ Moreover, in 2016, 21% of Black people living in Canada reported living in below standard housing, compared to 8% of white people.⁶ Also, those who identify as 2SLGBTQIA+ are disproportionately represented among those who are homeless, at risk of being homeless, or living in core housing need; and 2SLGBTQIA+ youth, seniors, Indigenous people, and those living with disabilities, mental health conditions, and/or addictions face the greatest housing needs.⁷

People with core housing needs do not have options to move into affordable, accessible, and safe housing in their

³ G. Suttor (2015), Rental Housing Dynamics and Lower-Income Neighbourhoods in Canada (Research Paper 235, Neighbourhood Change Research Partnership, University of Toronto), 26-27.

⁴ CMHC (2018). Housing Conditions of Persons with Disabilities. *Research Insight*, May 2018. Available at: <https://assets.cmhc-schl.gc.ca/sf/project/cmhc/pubsandreports/research-insights/research-insight-housing-conditions-persons-disabilities-69354-en.pdf>

⁵ CMHC. (n.d.). Core Housing Need Data – By the Numbers. Available at: <https://www.cmhc-schl.gc.ca/en/professionals/housing-markets-data-and-research/housing-research/core-housing-need/core-housing-need-data-by-the-numbers>

⁶ Government of Canada. “Social Determinants and Inequities in Health for Black Canadians: A Snapshot.” *Canada*, 9 Sept. 2020, www.canada.ca/en/public-health/services/health-promotion/population-health/what-determines-health/social-determinants-inequities-black-canadians-snapshot.html.

⁷ CMHC (2022). 2SLGBTQIA+ Housing Needs and Challenges. *The Housing Observer*, June 15, 2022. Available at: <https://www.cmhc-schl.gc.ca/blog/2022/2slgbtqia-housing-needs-challenges>

community,⁸ and they face higher risks of being homeless.

Women with disabilities living in Canada's North experience specific challenges to affordable and safe housing: resource projects and the related influx of workers in these areas dramatically push the cost of housing, which can lead to living in overcrowded and/or unsafe housing as well as increased risk of homelessness.⁹

Indigenous people, and especially Indigenous women with disabilities, face many barriers accessing adequate, affordable, and safe housing on and off reserves. As a result of historical and ongoing forms of colonialism, Indigenous women are more likely to live in poverty and with large families, leading to a crisis of overcrowding in many reserves. Off-reserves, Indigenous people, who are more likely to live with a disability than non-Indigenous people,¹⁰ face multi-

faced discrimination and a lack of culturally-affirming supports and services, which increase their likelihood to live in inadequate or unstable housing.¹¹ The deprivation of their culture and failure to prevent dispossession are direct violations of Article 8 of the Declaration on the Rights of Indigenous Peoples.

Lack of disability and diversity approaches in housing supports mean hospitals and long-term care facilities are increasingly becoming housing options for relatively young women with disabilities.¹² Disability advocates remark that there seems to be an increase in institutionalization of people with intellectual disabilities (in congregate settings, for example) due to the lack of adequate and affordable housing driven by the financialization of housing.

A non-binary advocate with multiple disabilities emphasized that the integration of people with disabilities in

⁸ Statistics Canada. (2022). Core Housing Need in Canada. *The Daily* (September 21, 2022). Available at: <https://www150.statcan.gc.ca/n1/pub/11-627-m/11-627-m2022056-eng.htm>

⁹ Manning, S. (2016) Experiences of Women with Disabilities in Canada's North. A FemNorthNet Factsheet. Available at: <http://fnn.criaw-icref.ca/images/userfiles/files/WWDsNorth.pdf>

¹⁰ Hahmann, T., Badets, N., & Hugues, J. (2019). *Indigenous people with disabilities in Canada: First Nations people living*

off reserve, Métis and Inuit aged 15 years and older. Statistics Canada: Aboriginal Peoples Survey. Available at: <https://www150.statcan.gc.ca/n1/pub/89-653-x/89-653-x2019005-eng.htm>

¹¹ Y. Belanger, G. Head, O. Awosoga (2012), "Housing and Aboriginal People in Urban Centres: A Quantitative Evaluation" *Aboriginal Policy Studies* 2 (1): 4-25.

¹² DAWN Canada. (2019). More than a footnote. Available at: <https://www.dawncanada.net/issues/new-page-morethanafootnote>

society is essential because “we've been isolated for so long that people don't know what it's like to be us. They don't see us as us, like they don't see us as human beings because they don't have to the same kind of exposures. And integration is quite meaningful and it makes us feel like we're part of the community and we're not like segregating into... two different populations.” The pattern of increased institutionalization violates the right of people with disabilities to living independently and being included in the community, enshrined in the CRPD.

SYSTEMIC BARRIERS TO HOUSING

Women with disabilities, especially those who live on disability or other social benefits, those who are single mothers, Black or racialized, or 2SLGBTQIA+ face discrimination from landlords as they may be perceived as financially unstable or unreliable, more prone to damaging the housing unit, unable to take care of their housing unit, making too much noise, more likely to complain, and, as a result, may thus be denied renting opportunities.¹³ For example, there is a


¹³ Conseil des Montréalaises. (2019). Se loger à Montréal : Avis sur la discrimination des femmes en situation de handicap dans le logement. November 12, 2019. Available at : <https://www.newswire.ca/fr/news-releases/lancement-de-l-avis-du-conseil-des-montrealaises-se-loger-a-montreal-avis->

lack of awareness and understanding of persons living with visual impairments that have led to stereotypes and misperceptions about blindness that has gone largely unaddressed. Even if disability-based and gender-based discrimination is prohibited, the current rental housing shortage creates high demand for affordable and accessible (which often means bigger) units, landlords have the discretion to choose who they rent to. Lamb, from Spinal Cord Injury BC, remarks that “units being built as adaptable housing can lead to the potential for discrimination based on the renter's needs for accommodation. Landlords can give preference to the renter who does not require accessibility renovations to move into a unit. No government regulations to control this exist.”

In addition, research from Toronto and Montreal indicate a number of discriminatory practices faced by Black and racialized renters, who report discriminatory screening processes or increased costs of renting due to their race.¹⁴ Housing barriers caused by

[sur-la-discrimination-des-femmes-en-situation-de-handicap-dans-le-logement-892614860.html](https://www.newswire.ca/fr/news-releases/lancement-de-l-avis-du-conseil-des-montrealaises-se-loger-a-montreal-avis-)

¹⁴ Government of Canada. “Social Determinants and Inequities in Health for Black Canadians: A Snapshot.”



discrimination have been exacerbated since the beginning of the pandemic: consultations in Montreal revealed that an increasing number of Montreal women struggle to secure adequate housing, especially those who experience discrimination due to ableism, racism, homophobia, and transphobia.¹⁵ In accordance with the International Covenant on Economic, Social and Cultural Rights, States Parties “must guarantee the right to adequate housing without any discrimination of any kind, including in relation to sex” (article 2.2).

Women with intellectual or developmental disabilities may be targeted for fraud by landlords, as they may be asked to signed contracts without fully understanding what they entail, or asked to pay in cash without signing a contract.¹⁶

Canada, 9 Sept. 2020, www.canada.ca/en/public-health/services/health-promotion/population-health/what-determines-health/social-determinants-inequities-black-canadians-snapshot.html.

¹⁵ Bennis, K., Boudot, A., Desroches, M., and Saulnier, M. (2022). Montréal 2050 : objectif égalité, inclusion et accessibilité. *Mémoire conjoint du Conseil des Montréalaises et de la Table des groupes de femmes de Montréal dans le cadre de la consultation « Réflexion 2050 » de l'Office de consultation publique de Montréal (OCPM).*

¹⁶ Conseil des Montréalaises, 2019.

Women with disabilities, especially those with intellectual or developmental disabilities, newcomers, and those who are particularly isolated, may not have the necessary information about their rights, or may be reluctant to speak up about inadequate living conditions because they may fear retaliation from property owners such as losing their housing, or other relationships or services.¹⁷ In our interviews with women and diverse people with disabilities renting from large rental companies, participants shared that they were scared of speaking up to their landlord about persisting maintenance issues in their units due to the fear of losing housing. Deaf women face communication barriers in finding information about housing or contacting property owners and housing organizations.¹⁸

Accessibility must also be considered broadly and beyond physical accommodations to include other types of care, daily life, and psychosocial supports. People with mental health conditions, including substance use disorders or mood disorders, face higher

¹⁷ *Ibid.*

¹⁸ *Ibid.*

risks of homelessness and may require specific supports in order to live independently in community.¹⁹ This is particularly important amongst 2SLGBTQIA+ people and Indigenous people, who are overrepresented in people with mental health conditions.²⁰ For example, permanent supportive housing provide a wide range of supports and social opportunities for diverse tenants, including meals, peer support programs, healthcare and psychosocial care, and social events. It is essential that these supports may be offered on a voluntary basis and not as a condition to tenancy. These supports have been found to “ensure housing stability and retention and mitigate risks of eviction”,²¹ and therefore reduce risks of homelessness, institutionalization, and incarceration.

AFFORDABILITY CRISIS

According to Canada Mortgage and Housing Corporation (CMHC), Canada is in a housing affordability crisis. The country would need an additional 3.5 million affordable units by 2030 to meet this need. In 2004/05 someone with an average income needed to spend 40% of their disposable income to buy a home in Ontario and 45% in BC. By 2021 a person needed to spend 60% of their disposable income on a house.²² People with disabilities who live off social assistance and in poverty are disproportionately impacted by the rise of living costs as they have little room to adapt to the increase costs of food, housing, and other necessities. This is especially true for seniors, who are more likely to live off fixed incomes and benefits. A non-binary person with multiple disabilities explained to DAWN Canada that many people on disability assistance “are struggling with the driving cost of living and food and everything associated with living, and they're becoming homeless fast. Or they

¹⁹ OCHR. (2022). *OHRC Engagement on Poverty and Systemic Discrimination in the Areas of Accessible, Adequate and Affordable Housing, Mental Health and Addiction Disabilities Background Paper*. P.4
https://www3.ohrc.on.ca/sites/default/files/20221101%20OHR%20Background%20Paper_Poverty%20and%20systemic%20discrimination_DESIGNED.pdf

²⁰ McDowell, K. (2021). LGBTQ2 vulnerability in the Canadian housing sector (Community Housing Canada Rep. No. 2). Retrieved from <https://doi.org/10.7939/r3-bac5-2503>

²¹ Homeward Trust. (2017). *Permanent supportive housing: Essential for ending homelessness*. Homeward Trust Edmonton. Retrieved from: endhomelessnessyeg.ca/wp-content/uploads/2017/07/PSH-Report-2017.pdf.

²² CMHC. (2022). *Canada's Housing Supply Shortage: Restoring Affordability by 2030*. June 23, 2022. Available at: <https://www.cmhc-schl.gc.ca/en/blog/2022/canadas-housing-supply-shortage-restoring-affordability-2030>

end up in situations where apartments are in terrible shape and they're not accessible." Her comments clearly indicate that people on fixed incomes cannot access both affordable and accessible units.

The Ontario Human Rights Commission stipulates that the "high cost of market housing combined with long wait lists for community housing has created an extreme shortage of affordable, stable and safe housing, and is a leading contributor to poverty in Ontario."²³

Since the pandemic, more people with disabilities, especially women with disabilities, those who live on social assistance, are lone parents, Black, Indigenous, or racialized, or older women, live in low income or in poverty due to reduced or loss of employment and income, increased costs of living, including care and housing costs.²⁴ These dynamics lead women with disabilities to chronically live in inadequate, inaccessible, or unsafe housing, and they

²³ OCHR. (2022). p.4

²⁴ Stienstra, D., Grand'Maison, V., Pin, L., Rodenburg, E., Garwood, K.; Reinders, K. (2021). Disability Inclusion Analysis of Lessons Learned and Best Practices of the Government of Canada's Response to the COVID-19 Pandemic.

increase housing instability and homelessness for diverse women with disabilities.²⁵ In Canada, 46% of women who report having been homeless also have a disability.²⁶ 2SLGBTQIA+ youth remain overrepresented in the homeless population, especially trans youth, due to employment and or housing discrimination and rejection from the family home.²⁷ Under Article 27 of the Convention on the Child, State Parties must "recognize the right of every child to a standard of living adequate for the child's physical, mental, spiritual, moral and social development."

Access to ownership is also essential for people with disabilities, as research shows that ownership leads to increased quality and affordability of housing, compared to renting privately.²⁸

²⁵ OCHR, 2022.

²⁶ Cotter, A. (2018) Violence and Victimization of Women with Disabilities. Statistics Canada. Available at: <http://www.statcan.gc.ca/pub/85-002-x/2018001/article/54910-eng.pdf>

²⁷ Abramovich, Alex & Shelton, Jama. 2017. "Introduction: Where are we now?" in Where Am I Going to Go? Intersectional Approaches to Ending LGBTQ2S Youth Homelessness in Canada & the U.S. by Abramovich, Alex, & Shelton, Jama. (Eds.). Toronto: Canadian Observatory on Homelessness Press, p.2. Available online: <http://homelesshub.ca/whereamigoingtogo>

²⁸ Winters, S. & K. Van den Broeck (2023): Housing of persons with disabilities: what can be learned from the introduction of more demand-driven subsidies in Flanders?,

GENDER-BASED VIOLENCE, DISABILITY AND HOUSING

Access to affordable, accessible, and safe housing is particularly important to address violence against diverse women, girls, and gender diverse people with disabilities. The right to adequate living conditions for diverse women and girls, including rights to ownership, acquisition, management, administration, enjoyment and disposition, is enshrined in the Convention on the Elimination of All Forms of Discrimination against Women (articles 14.2 and 16).

Women, girls, and gender diverse people with disabilities experience compounding obstacles when fleeing violence, which were exacerbated during the pandemic: while they faced increased and more severe instances of violence, women's shelters became less accessible due to public health measures and staff shortages. In addition, women, girls, and gender diverse people with disabilities may have experienced increased reliance on the person abusing them due to reduced service provision, loss of employment and/or income, or health

risks management.²⁹ Survivors may therefore stay in abusive relationships due to a lack of accessible, affordable, and adequate housing, or forced to move into neighbourhoods, buildings, and or housing units that are inadequate, not adapted to their needs, or where they cannot safely express their gender or sexual identity.³⁰

IMPACTS OF RENOVICATIONS ON WOMEN AND GIRLS WITH DISABILITIES

Women with disabilities, as well as older women, Black and racialized women, and immigrant women, may lose their support system if they are forced to do so because of renovictions, inability to afford the rising costs of rent or other types of evictions driven by the pursuit of high turnover for private rental companies.³¹ In the United States, research showed that there was a considerable increase in evictions judgments (targeting Black renters) following the purchase of rental housing by private investors.³² The systemic

²⁹ Stienstra, D., Grand'Maison, V., Pin, L., Rodenburg, E., Garwood, K.; Reinders, K. (2021). Disability Inclusion Analysis of Lessons Learned and Best Practices of the Government of Canada's Response to the COVID-19 Pandemic.

³⁰ Bennis, K. et al., 2022.

³¹ Bennis et al., 2022.

³² Raymond, E. L., Miller, B., McKinney, M., & Braun, J. (2021). Gentrifying Atlanta: Investor purchases of rental

rise of costs within a neighbourhood also leads to the break down of cultural communities when Black people and businesses are forced to move, which can lead to cultural isolation.³³

Concerns with reducing the size of property and rental units to increase profits not only reduces the accessibility of the unit for people with disabilities, it also makes it more difficult or even impossible to make them accessible in the future.³⁴ The financialization of housing limits choices that women with disabilities have for their housing, leaving them in spaces too small and sometimes overcrowded.³⁵

PROFIT-DRIVEN SHORTAGE OF ACCESSIBLE UNITS

Having housing options—that are accessible, affordable, and safe, paired

housing, evictions, and the displacement of black residents. *Housing Policy Debate*, 31(3-5), 818-834.

³³ Community Housing Transformation Centre - Centre de Transformation Du Logement Communautaire. (2023). Reinforcing Black Canadian communities through housing transformation. <https://centre.support/reinforcing-black-canadian-communities-through-housing-transformation>

³⁴ Conseil des Montréalaises, 2019.

³⁵ Canadian Centre for Economic Analysis and the Canada Urban Institute. (2019). Toronto Housing Market Analysis: From Insight to Action. Canadian Centre for Economic Analysis (CANCEA) and the Canadian Urban Institute (CUI) for the Affordable Housing Office (AHO) Available at: From: <https://canurb.org/publications/toronto-housing-market-analysis-from-insight-to-action/>


with the ability to move, have been shown to improve housing quality for people with disabilities.³⁶ The UN Committee on the Rights of Persons with Disabilities has stipulated that universal design be applied to new goods, facilities, products, technologies, and services. However, universal design is not mandated through any government funding like the Canada Mortgage and Housing Corporation or any provincial government housing agencies. As a result, people with disabilities often have to bear the financial and logistical responsibility of making their homes accessible to their needs, and given that a higher proportion of people with disabilities rent compared to people without disabilities,³⁷ they depend on the property owner's acceptance to do the changes, which gives them even more power over tenants.³⁸

Many women and gender diverse with disabilities have no other option than to

³⁶ Winters, S. & K. Van den Broeck, 2023

³⁷ 41.7% of Canadians with mental health related disabilities rent their homes, as compared to 24.9% of those without disabilities. Statistics Canada. (2021). One in five Canadians with mental health-related disabilities lives in core housing need. *The Daily*, January 28, 2021. Available at: <https://www150.statcan.gc.ca/n1/en/daily-quotidien/210128/dq210128d-eng.pdf?st=FCpqJqSe>

³⁸ Conseil des Montréalaises, 2019.



live in inaccessible units, which further impacts their well-being and health. As Heather Lamb, from Spinal Cord Injury BC explains, there are “large waitlists and not enough accessible units being built in BC. Given the housing crisis in BC a large portion of individuals that need accessible housing are unable to afford at market rent units due to lower income and extra out of pocket expenses with their disabilities.”

The lack of accessible units in purpose-built rental units contributes to the lack of accessible housing options. The story of a woman with disabilities confirms this: “I started looking for housing 6 months in advance trying to find anything that was accessible. I couldn't find anything, nothing that was remotely affordable. I found one, but it was a whole house. It was way out of my price range as a student and young adult. I don't live in accessible housing. I currently live in a large complex. They have complexes in 8 cities across BC and AB. There are about

145 suites in each complex. There is not a single accessible suite in any of them.”

Moreover, many women with disabilities have shared with us that the accessibility and safety of their units are constantly jeopardized by inadequate maintenance and the lack of timely repairs. A single mother with disabilities expressed that “you have to fight to get regular maintenance, to get repairs done that are potentially unhealthy. (...). It's a constant struggle.” Similarly, a young woman with disabilities told us that “I live on the 4th floor and the elevator is out of service probably twice a month for maintenance and move-ins. I have to maneuver myself up and down 4 flights of stairs as I have no other option. I live with severe bilateral hip dysplasia. It's not comfortable for me, I have to take a break on every floor to regroup and pump myself up for the next set of stairs. It's more mentally draining for me than anything else. I can recover physically. It's just so frustrating. I will walk in my door and I will yell because I am so mad at my situation.”

Some women with disabilities claim that landlords do not address maintenance or safety issues because they know that people with disabilities have no other housing options. A single mother living with mental health conditions shared that “if you don't even feel equal in your housing choices, it's a domino effect on your mental health and your disability,” meaning that the lack of housing options led to accepting inadequate and unsafe housing conditions that worsened her disabilities.

At this time, women and gender diverse people with disabilities must often decide between an affordable or accessible units. If there are none or little mechanisms to curb financial investment in housing as well as oversight on investment activities, private investments in housing will continue to grow. While the federal government wants to expand the affordable housing market, evidenced by the NHS, it must accompany it with accountability mechanisms to ensure housing affordability. There is no accountability mechanism to ensure that the housing stock invested in by large housing firms will be part of the “affordable housing” stock. This contradicts the federal government’s mission to increase the stock of affordable

housing.³⁹ The use of taxation may be a more immediate solution to decrease the financialization of housing but must be accompanied continuously by government spending in the sector to avoid a shortage of housing supply.

HOUSING A MATTER OF LIFE OR DEATH

The pandemic revealed that the drive for profits of private long-term care homes

FINANCIALIZATION OF LONG-TERM CARE

Financial investors own 20 to 50 percent of seniors and retirement homes in Canada. According to Brown (2022), private firms provide a lower quality of care than public and not-for-profit seniors’ housing. As women make up 69.8% of the long-term and retirement residences housing population, many of which may have a disability, women with disabilities are disproportionately impacted by lower standards of living and of care caused to the financialization of seniors’ housing.

³⁹ Canada Mortgage and Housing Cooperation. (2018, March 31). About Affordable Housing in Canada: Programs and investments that help Canadians access high-quality affordable housing. Canada Mortgage and Housing Cooperation. <https://www.cmhc-schl.gc.ca/en/professionals/industry-innovation-and-leadership/industry-expertise/affordable-housing/about-affordable-housing/affordable-housing-in-canada>

(LTCs) led to excess deaths of residents, many of which are people with disabilities, as well as isolation, neglect, and violence towards many other residents. Canadian research has well established that for-profit LTCs had the highest mortality rates (compared to non-for-profit or publicly funded LTCs), due in part to, overcrowding, shortage of staff, inadequate safety training and protocols.⁴⁰

A 31-year-old woman with multiple disabilities from Toronto accessed medical assisted death (MAiD) because of the lack of adequate, accessible, and affordable housing. She relies exclusively on the Ontario's Disability Support Program to meet her needs, which is \$1,169 a month with an additional \$50 for a special diet. She claims that she "applied for MAiD essentially...because of abject poverty."⁴¹ She explains that applying for MAiD has been easier than getting relocation or

funding supports from housing agencies in Toronto.

As mandated in the CRPD (Article 10), the Canadian government must protect the right to access to life for all people with disabilities by ensuring that they have barrier-free access to their basic needs, including accessible housing.

RECOMMENDATIONS

1. As mandated in the Convention on the Rights of People with Disabilities (articles 28 and 9), **the federal government must commit to monitoring and reporting on violations to the right of housing** of women and gender diverse people with disabilities, especially those located at historically marginalized identities.
2. Mandate that all new housing developments **integrate universal design principles**. Public funding should be connected to the integration of universal design in new developments.
 - a. **Legislate the mandatory implementation of a defined code on accessibility** of multi-unit residential housing. This

⁴⁰ Akhtar-Danesh, N., Baumann, A., Crea-Arsenio, M., & Antonipillai, V. (2022). COVID-19 excess mortality among long-term care residents in Ontario, Canada. *PLoS One*, 17(1), e0262807.

⁴¹ Favaro, A. (2022). Woman with disabilities nears medically assisted death after futile bid for affordable housing. *CTV News*, May 4, 2022. Available at: <https://www.ctvnews.ca/health/woman-with-disabilities-nears-medically-assisted-death-after-futile-bid-for-affordable-housing-1.5882202>

code should be guided by the CSA/ASC B652, accessible dwellings created by the Canadian Standard Association (CSA), Accessibility Standards Canada (ASC), and the Canadian Mortgage and Housing Corporation (CMHC).

- b. Expand CSA/ASC B652 to include that, at minimum all grounds floors should have fully accessible private areas and enforced by the municipal planning departments that issue the building permits to the builders.
3. Provide both **demand-side subsidies** (attached to the individual) and **supply-side subsidies** (at the investment side, for example) to allow for more accessible, affordable, and adequate options for diverse people with disabilities.⁴²
4. Implement uniform laws **regulating long-term care** and retirement residencies.
5. **Support and equip the takeover of many private seniors' housing** by not-for-profit and public organisations to ensure good quality of care for seniors and youth in long-term housing and retirement residences.⁴³
6. Implement a **mandatory quota of accessible units** in every multi-residential facility funded by the CMHC.
7. Establish transfers to municipalities to **control the costs of private rental units**, through, for example, regulating renovictions and other types of evictions, and safeguarding rooming houses.⁴⁴
8. **Invest in the development of social and affordable housing**, including permanent housing support, that is accessible to people with a wide range of disabilities, safe, and located near essential services, schools, public transport, community organizations, and businesses.
 - a. Part of this housing should be reserved to diverse women

⁴² Winters, S. & K. Van den Broeck (2023).

⁴³ Brown, 2022.

⁴⁴ Bennis et al., 2022.

with disabilities and other marginalized groups, such as Indigenous, Black, and racialized people. Funding should be connected to this.⁴⁵

- b. Resources should be allocated to support the care needs and full inclusion of people with diverse disabilities where they live.

9. **Establish coordination mechanisms** between housing and disability supports, as well as culturally-affirming supports for Indigenous, Black, and racialized people, immigrants, and refugees, and other community supports for historically marginalized groups.

10. Commit to providing sustained and adequate funding and support to housing and disability civil society organizations **who plan, build, and/or manage social and community housing projects.**

11. Commit to providing sustained adequate funding to housing and disability civil society organizations that **negotiate with, accompany,**

and monitor real estate developers and municipalities for the implementation of accessibility policies in the construction and management of housing projects.


12. Implement **data collection** mechanisms about the number and quality of housing units that are accessible and affordable.

- a. Monitor patterns of housing discrimination by large housing management companies.

13. Create **accountability mechanisms** to ensure that the approved funds for each developer is used as proposed in the funding applications.

- a. These accountability mechanisms including mandatory reporting by recipients of funds, targeted performance reviews/evaluations of funding recipients, significant ownership by the federal government of stocks in large housing development companies, membership of the federal government,

⁴⁵ *Ibid.*



disability civil society organizations and people with lived experiences, on presiding boards of large housing development companies, and rescinding funding when proposed items in the funding application are not met.⁴⁶

14. Provide support for system

navigation and coordination across housing, care, and other basic life needs for people with disabilities.

15. Develop, with the meaningful collaboration of diverse people with disabilities, **public education** campaigns addressing the negative stereotypes of people with disabilities in general, and as tenants, specifically.

⁴⁶ Canada Mortgage and Housing Cooperation. (2023, February 23). Universal design for new multi-unit residential buildings: Universal design is the design of an environment that can be accessed, understood and used by all people regardless of their age, size, ability or disability. It also recognizes that peoples' needs can change over time. Canada Mortgage and Housing Cooperation. <https://www.cmhc-schl.gc.ca/professionals/industry-innovation-and-leadership/industry-expertise/accessible-adaptable-housing/universal-design-new-multi-unit-residential-buildings>