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CENTRE CANADIEN  
POUR L'AUTONOMISATION  
DES FEMMES



Women and Gender  
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**To: National Housing Council**

Review Panel on the Financialization of Purpose-Built Rental Housing  
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## **SUBMISSION ON THE FINANCIALIZATION OF PURPOSE-BUILT RENTAL HOUSING**

**“HAVING HOUSING MADE EVERYTHING ELSE POSSIBLE<sup>1</sup>”**

### **IMPACTS OF FINANCIALIZATION OF HOUSING ON WOMEN FLEEING DOMESTIC ABUSE**

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<sup>1</sup> Quote from a participant in the study by Clough, A., Draughon, J. E., Njie-Carr, V., Rollins, C., & Glass, N. (2014). "Having Housing Made Everything Else Possible": Affordable, Safe and Stable Housing for Women Survivors of Violence. *Qualitative social work: QSW: research and practice*, 13(5), 671–688. <https://doi.org/10.1177/1473325013503003>

This written submission is provided before the National Housing Council concerning their Review of the issue of the financialization of purpose-built rental housing in Canada.

## RECOMMENDATIONS

- **Recommendation 1:** Stop the financialization of housing to curb the impacts on survivors and their children.
- **Recommendation 2:** Clearly define “affordability” across all programs and funds.
- **Recommendation 3:** Collect disaggregated data on the housing situation and needs of survivors fleeing domestic violence, including Economic Abuse.
- **Recommendation 4:** Prioritize survivors’ rights to have safe and secure housing, ensuring their right to a life without harm and violence, fulfillment and enjoyment of family and private life.
- **Recommendation 5:** The National Housing Council calls Ms. Meseret Haileyesus, Founder and Executive Director of CCFWE as a witness

## SUMMARY

Safe and affordable housing is a prerequisite for leaving domestic violence, and without it, it is one of the primary reasons victim-survivors remain in abusive situations.

While the federal government has reiterated the right to housing as a human right, current housing policies are not protecting this right for people in Canada.

The financialization of housing disproportionately affects women and their children seeking to escape domestic violence. Faced with a severe shortage of affordable and suitable long-term housing, survivors are forced to decide whether to accept unsafe and inadequate housing for themselves and their children or to return to violence. Their housing choices are limited by the systemic power structures they find themselves in as low-income women, survivors of domestic abuse, single parents and often part of the BIPOC, disabled or otherwise marginalized community.

The Canadian Center for Women’s Empowerment (CCFWE), therefore, urges the federal government to prioritize the right to safe and affordable housing for women and children fleeing violence. It has to commit a maximum available amount of resources so that no survivor has to return to an abusive relationship due to a lack of housing options.

## ISSUE

According to Statistics Canada (2021), **almost half (44%) of all women in Canada have experienced some form of abuse**, while one woman or girl gets killed every 48 hours, predominantly by men<sup>2</sup>.

Statistics show that the most dangerous time for women in abusive relationships is just before and after separation. This is when most (70%) femicides occur<sup>3</sup>. Leaving the abuser is a courageous and risky undertaking, especially when children are involved.

**The availability of safe shelter is one of the main prerequisites for women and children fleeing domestic violence.** In the short term, immediate access to women's shelters is crucial for their safety and well-being. In the long term, affordable and secure housing is pivotal to survivors regaining control and autonomy over their lives.

After escaping an environment where the home was associated with violence, coercive control, and uncertainty, women need to know they have a safe place that they have control over. As a survivor in a study on housing explains, “[h]ome to me is to have safety and love, that's home. Come home, you're safe. That's your environment. I might not have much in my fridge today, but I have a home, and I know I'm safe.” Similarly, another woman mentions, “[i]t doesn't always have to be the nicest place in the world, but if your security is there, and that's where the kid leaves their stuff that they sleep with every night...it just basically boils down to the feeling that you get, when you get home<sup>4</sup>.”

Having a home relieves a lot of stress and is also essential to tackle other issues after separation. Once they have a permanent address, this allows survivors to open a bank account, receive social assistance, and consequently, find employment and improve their financial health. As a survivor in a study on housing noted, “Having housing made everything else possible<sup>5</sup>.”

The Canadian Center for Women's Empowerment (CCFWE) welcomes the federal government's reiteration of the **right to housing as a fundamental human right** within the *2019 National Housing Strategy Act*. We strongly agree that everyone, even the most vulnerable, deserves a safe place to stay. This must especially include women and their children fleeing violence.

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<sup>2</sup> Statistics Canada. “Intimate partner violence in Canada, 2018” (2021). Online: <https://www150.statcan.gc.ca/n1/daily-quotidien/210426/dq210426b-eng.htm>; Canadian Femicide Observatory for Justice and Accountability, 2022. Online: <https://femicideincanada.ca/callitfemicide2018-2022.pdf>

<sup>3</sup> The Joint Federal / Provincial Commission into the April 2020 Nova Scotia Mass Casualty. (2023) “Turning the Tide Together: Final Report of the Mass Casualty Commission Volume 3: Violence”. p. 322. Online: <https://masscasualtycommission.ca/files/documents/Turning-the-Tide-Together-Volume-3-Violence.pdf>

<sup>4</sup> Thompson, S. (2022). “Homes not shelters”: co-productions of home in financialized social housing for women in Vancouver, Canada. *Urban Geography*, 1–19. <https://doi.org/10.1080/02723638.2021.2014668>

<sup>5</sup> Clough, A., Draughon, J. E., Njie-Carr, V., Rollins, C., & Glass, N. (2014). “Having Housing Made Everything Else Possible”: Affordable, Safe and Stable Housing for Women Survivors of Violence. *Qualitative social work: QSW: research and practice*, 13(5), 671–688. <https://doi.org/10.1177/1473325013503003>, p 11

**Unfortunately, the current housing system fails survivors, often leaving them with no choice but to return to their abusive partner, making their home a place of violence, control, and fear.**

The federal government's efforts toward the right to housing for women fleeing violence have been inadequate. Even though survivors are named as one of the National Housing Strategy priority groups, current initiatives do not address their critical needs, severely hindering their journey toward empowerment, stability and safety.

## **SYSTEMIC BARRIERS TO ADEQUATE HOUSING**

**In the current highly competitive housing market, survivors are confronted with layers of intersecting social hierarchies of power that are exasperated by the financialization of housing<sup>6</sup>.** Survivors face unique challenges accessing housing, including but not limited to having low income, being from racialized communities, being traumatized by gender-based violence, and caregiving as single parents. Survivors face unaffordable, inadequate housing for themselves and their children, discrimination from landlords, and the absence of social housing or off-market housing options<sup>7</sup>.

### **1. Lack of housing options drives survivors back to their abusers**

According to Statistics Canada, in 2019 (thus pre-pandemic), **almost 1,000 women and children were turned away from shelters in Canada every day**, primarily due to overcapacity<sup>8</sup>.

If survivors cannot find a safe place to stay, they are forced to either return to their abuser or find another, often unsafe, solution. Many women resort to sleeping in their cars, on the streets, or in inadequate homeless shelters. The scarcity of housing programs designed explicitly for women and children escaping abuse fails to meet the overwhelming demand they face.

CCFWE's national research study found that 79% of participating social service providers agreed that clients stay in abusive relationships due to a lack of housing accessibility<sup>9</sup>. This aligns with a study conducted by Statistics Canada, which shows that "81% of facilities reported

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<sup>6</sup> Thompson, S. (2022). "Homes not shelters": co-productions of home in financialized social housing for women in Vancouver, Canada. *Urban Geography*, 1–19. <https://doi.org/10.1080/02723638.2021.2014668>

<sup>7</sup> Idem.

<sup>8</sup> Statistics Canada. (2019) "Residential facilities for victims of abuse in Canada, 2017/2018". Online: <https://www150.statcan.gc.ca/n1/pub/11-627-m/11-627-m2019027-eng.htm>

<sup>9</sup> Snow, N.; Chandrarajan, N. (2022). "Understanding the nature of economic abuse. A National study on service provider insights in Canada." CCFWE. Online: <https://ccfwe.org/wp-content/uploads/2023/07/CCFWE-understanding-the-nature-of-economic-abuse-A-National-study-on-service-provider-insights-in-Canada-may-9.pdf>

the 'lack of affordable and appropriate long-term housing was one of the top issues facing their residents<sup>10</sup>.'"

A January 2023 report from Scotiabank highlights the enormous gaps between current market pricing of rentals and affordability criteria (30% or less of someone's taxable income) for low-income households. The report demonstrates that "the average renter in the bottom income quintile would need another \$670 per month to afford a 2-bedroom rental in 2021 without exceeding the affordability threshold. In British Columbia and Ontario, this figure exceeds \$1000 per month<sup>11</sup>."

Thus, **survivors on social assistance need almost twice as much as they currently receive to afford an average apartment.** Other viable options do not exist or are hard to come by as social housing units have steadily declined.

The report also finds that Canada drastically falls behind other G7 countries on social rental dwellings, only making up 3.5% of the total number of dwellings, compared to 16.7% in the United Kingdom or 7.5% as the EU average<sup>12</sup>. Not surprisingly, waiting lists for affordable housing programs often extend to more than two years without other options.

A recent news article highlighted the dire situation of women in British Columbia having nowhere to go after their time in transition housing is up<sup>13</sup>. Most of them are forced to return to abusive situations, with the data being constant for the last few years.

**Not finding permanent affordable housing and the significant likelihood of having to return to the abusive partner is retraumatizing, dehumanizing and disheartening.** Women fleeing abuse need a safe space to heal, work past the traumatic experiences and eventually regain control of their lives.

## 2. Survivors hindered from renting due to landlord discrimination

In CCFWE's 2022 research study, 72% of social service providers mentioned to CCFWE that, in their experience, landlords tend not to demonstrate understanding toward the complexities of intimate partner violence when renting to survivors<sup>14</sup>.

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<sup>10</sup> Statistics Canada (2022). "Canadian residential facilities for victims of abuse, 2020/2021". Online: <https://www150.statcan.gc.ca/n1/pub/85-002-x/2022001/article/00006-eng.htm>

<sup>11</sup> Idem.

<sup>12</sup> Scotiabank. "Canadian Housing Affordability Hurts" January 18, 2023. Online: <https://www.scotiabank.com/ca/en/about/economics/economics-publications/post.other-publications.insights-views.social-housing--january-18--2023-.html>

<sup>13</sup> Fagan, E. (2023, June 15). Hundreds of Women Have Nowhere to Go After Transitional Housing. The Tyee. <https://thetyee.ca/News/2023/06/15/Women-Nowhere-Transitional-Housing/>

<sup>14</sup> Snow, N.; Chandrarajan, N. (2022). "Understanding the nature of economic abuse. A National study on service provider insights in Canada." CCFWE. Online: <https://ccfwe.org/wp-content/uploads/2023/07/CCFWE-understanding-the-nature-of-economic-abuse-A-National-study-on-service-provider-insights-in-Canada-may-9.pdf>

The scarcity of affordable housing widens the existing power imbalance between landlords and tenants, and survivors are disproportionately affected. They face multifold discrimination due to their status as low-income women, survivors, and potentially as members of the BIPOC or other marginalized communities. Not only are increasing prices deterring middle and lower-class families from affording housing, but it specifically denies members of disadvantaged groups this fundamental human right<sup>15</sup>.

The impacts of financialization are much more amplified in metropolitan areas such as Toronto, having bigger impacts among racialized people, especially Black people. Lewis' investigations during the COVID-19 pandemic reveal that multi-family rental housing areas with high Black populations indicate a disproportionate rate of forced evictions by private landlords<sup>16</sup>. On top of the sudden income loss brought by the pandemic, many renters are at higher risk of losing housing when “rent burden is high,” especially for “Black Canadians” and “individuals of low-income status” living in Toronto. Lewis conceptualizes these processes as part of an agenda to racially banish and erase BIPOC individuals and low-income families from metropolitan and urban communities, which is instead meant to preserve higher-income and privileged groups who can supposedly generate more wealth for the housing market<sup>17</sup>.

Furthermore, as activity to promote the financialization of housing increases, so too have numbers around the eviction and homelessness crisis.

In their consultation, the Ontario Human Rights Commission has heard from numerous participants about the power imbalance between landlords and low-income women. For example, women reported they were asked for sexual favours from landlords to make up for rent or prevent eviction. This can make affordable housing units unacceptable and inaccessible for them<sup>18</sup>.

The Commission also found that race and race-related grounds are additional significant barriers to housing. Even though there are numerous examples, race-related discrimination is often hard to prove as few landlords would directly express it. “[R]acism can be difficult to identify because it is often systemic in nature – existing in the very structures of the housing market.”<sup>19</sup>

Finally, consultees noted that previous experience with domestic violence can affect their chances of finding housing due to landlords' stereotypes about survivors. Findings from a study

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<sup>15</sup> Lewis, N. (2022) "The uneven racialized impacts of financialization: A report for the Office of the Federal Housing Advocate." The Office of the Federal Housing Advocate. Online: [https://www.rondpointdelitinerance.ca/sites/default/files/attachments/Lewis-Financialization-Racialized-Impacts-of-ha-e\\_n.pdf](https://www.rondpointdelitinerance.ca/sites/default/files/attachments/Lewis-Financialization-Racialized-Impacts-of-ha-e_n.pdf)

<sup>16</sup> Idem.

<sup>17</sup> Idem.

<sup>18</sup> Ontario Human Rights Commission, "Right at Home. Report on the consultation on human rights and rental housing in Ontario," 2008. Online:

<https://www.ohrc.on.ca/en/right-home-report-consultation-human-rights-and-rental-housing-ontario>

<sup>19</sup> Idem

confirmed that landlords are far less likely to rent to women who presented themselves with social workers or mentioned they were survivors<sup>20</sup>.

### 3. Direct consequence of Economic Abuse and coerced debt

In addition to the multifold discrimination, **survivors are further disadvantaged as potential tenants due to the standard practice of demanding credit reports** as a prerequisite to renting an apartment.

Studies conducted in the United States, the United Kingdom and Australia show that **roughly 95% of all domestic abuse survivors have also experienced Economic Abuse**.<sup>21</sup> Economic Abuse is a form of violence and coercive controlling behaviour. It refers to various tactics that limit an individual's financial autonomy, including but not limited to denying them access to their money, exerting control over their resources, or leveraging intimidation and threats to constrain their economic freedom.

As a direct consequence of Economic Abuse and coerced debt, survivors are often highly indebted, without a regular income and a low credit score. CCFWE's research study demonstrated that **93% of all participating survivors did not have access to their own money and that their abuser had previously taken away paychecks, financial aid, or other assistance. 84% mentioned that their abuser built debt up under their name**<sup>22</sup>.

More and more legislation recognizes the problem of coerced debt. It establishes procedures that disallow creditors to go after debt from abusive relationships or for coerced debt from survivors to show up in credit reports<sup>23</sup>. While these measures are sufficient for survivors to free themselves from debt accrued by their perpetrators, these processes can take a long time until they are in effect. Until then, survivors are denied as tenants due to low credit scores resulting from coerced debt. **Abusers even intentionally use harming a survivor's credit as a tactic so they cannot find housing and thus be forced to return.**

Economic Abuse can also prevent survivors from participating in social housing programs, as having outstanding debt can exclude someone from applying for a new place to stay.

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<sup>20</sup> Canada Mortgage and Housing Corporation (2006). "Housing Discrimination Against Victims of Domestic Violence" Socio-economic Series. Online:

[https://publications.gc.ca/collections/collection\\_2011/schl-cmhc/nh18-1-2/NH18-1-2-182-2006-eng.pdf](https://publications.gc.ca/collections/collection_2011/schl-cmhc/nh18-1-2/NH18-1-2-182-2006-eng.pdf)

<sup>21</sup> Adams, A. E., Sullivan, C. M., Bybee, D., & Greeson, M. R. (2008). Development of the Scale of Economic Abuse. *Violence Against Women*, 14(5), 563–588. <https://doi.org/10.1177/1077801208315529>

<sup>22</sup> Idem.

<sup>23</sup> Legislative Assembly of Ontario. "An Act to amend the Consumer Reporting Act and the Prevention of and Remedies for Human Trafficking Act, 2017 with respect to certain debts incurred in relation to human trafficking." Online: <https://www.ola.org/en/legislative-business/bills/parliament-43/session-1/bill-41>; Text - H.R.2332 - 117th Congress (2021-2022): Debt Bondage Repair Act. (2021, June 16).

<https://www.congress.gov/bill/117th-congress/house-bill/2332/text>

Previous evictions are an additional barrier to housing that often stems from the abusive relationship (e.g., when an abusive partner damages an apartment or does not pay rent without telling the survivor whose name is on the lease). In a survey, 37.2% of participating women with housing needs reported having experience with eviction. 27.9% mentioned that they would have needed legal help to address their housing situation but could not get it, consequently losing their house<sup>24</sup>.

While some private landlords might demonstrate compassion and understanding regarding the situation of survivors, corporate landlords or property management firms hired by Real Estate Investment Trusts (REITs) are far less likely to accommodate and make exceptions.

On top of the burden of finding affordability and safety in housing, survivors also have to consider neighbourhoods that are unknown to their former abuser, located near their children's schools or kindergarten, and abide by welfare regulations. Thus, mothers leaving abusive situations face further challenges in accessing and regaining housing.

The shortage of affordable and off-market housing options, rising food prices and overburdened assistance programs due to inflation can lead to additional systemic barriers survivors must face in realizing their right to housing. **They are forced to decide whether to return to or remain in their abusive relationship or whether to eventually agree to live in inadequate and unsafe conditions, endangering themselves and their children.**

Survivors (women and children fleeing violence) are named as one of the National Housing Strategy priority groups. Yet, little is done to address the systemic barriers that most encounter.

**The government is responsible for ensuring the right to housing for all. This includes its duty to allocate a maximum of available resources so women and children fleeing violence have access to adequate and secure housing and break the cycle of poverty and violence.**

## **IMPACTS OF FINANCIALIZATION ON THE HOUSING SITUATION FOR SURVIVORS**

The financialization of housing, at its core, views housing as a commodity rather than a fundamental right. When **the primary purpose is no longer to ensure the right of housing is possible for all but to maximize profits**, current housing policies encouraging financialization are deeply intertwined with neoliberal policies of an uncontrolled, unregulated

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<sup>24</sup> Schwan, K., Vaccaro, M., Reid, L., Ali, N., & Baig, K. (2021). The Pan-Canadian Women's Housing & Homelessness Survey. Toronto, ON: Canadian Observatory on Homelessness. p. 32ff. Online: <https://womenshomelessness.ca/wp-content/uploads/EN-Pan-Canadian-Womens-Housing-Homelessness-Survey-FI-NAL-28-Sept-2021.pdf>

market. Consequently, the depletion of social services and social problems brought about by the State are “blamed on the individual rather than the failures of a system<sup>25</sup>.”

This view ignores the underlying intersectional and structural barriers that survivors face and the current housing system fails to address. By doing so, current policies neither adequately ensure survivors’ right to housing nor their right to protection from gender-based violence and abuse.

**Under international law, Canada has the obligation to fulfill human rights but also the duty to protect it from interference by third parties.**

**Financialization regards housing not as a fundamental human right but as a lucrative investment opportunity limited to a privileged few.** This perspective contradicts the notion of housing as a basic necessity that should be accessible and enjoyed by all members of society. This approach perpetuates inequality by prioritizing financial gain over housing as a fundamental right. It denies many individuals, particularly Black and Indigenous individuals, the opportunity to secure safe and affordable housing for themselves and their families.

Lewis (2022) provides an example of Starlight Investments that systematically selected undervalued properties in often disenfranchised communities. By pushing longtime tenants out of their homes through rapid rent increases, corporate investors accelerate gentrification and destabilize neighbourhoods, adding further pressure on already vulnerable populations<sup>26</sup>.

This profit-driven approach disregards the stability and affordability of housing, adversely affecting tenants and contributing to the broader issue of housing insecurity. For victims of domestic violence, financialization tactics such as rental contracts and deposits become pain points restricting women from properly leaving their abusive partner and living conditions. These strategies heavily relied on “reducing the supply of affordable housing” only to prioritize profits over the human right to housing. Thus, it becomes clear that **housing in the form of REITs was not made to protect and reflect the needs of women escaping domestic abuse but instead to confine them<sup>27</sup>.**

Due to the inherent nature of their business, financial landlords prioritize maximizing short-term returns while being indifferent to the detrimental consequences for survivors and other vulnerable populations. These consequences include rent spikes, forced evictions through renovations, and converting affordable housing into investment opportunities, some of which are observed outcomes.

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<sup>25</sup> Thompson, S. (2022). “Homes not shelters”: co-productions of home in financialized social housing for women in Vancouver, Canada. *Urban Geography*, 1–19.p 670. <https://doi.org/10.1080/02723638.2021.2014668>

<sup>26</sup> Lewis, N. (2022) "The uneven racialized impacts of financialization: A report for the Office of the Federal Housing Advocate." The Office of the Federal Housing Advocate. Online: <https://www.rondpointdelitinerance.ca/sites/default/files/attachments/Lewis-Financialization-Racialized-Impacts-ofha-en.pdf>

<sup>27</sup> (Lewis, 2022, p. 20)

In a recent article by Ricardo Tranjan, he argues that referring to a "housing crisis" would elicit feelings of surprise and unexpectedness that would provoke quick and drastic measures, as seen during the COVID-19 pandemic. Canada's housing situation, on the other hand, has been flawed for a long time<sup>28</sup>. The current "crisis" is the direct and predictable consequence of changing housing policies that started in the 1980s and 1990s, shifting their focus from providing social housing for lower-income households to facilitating private rental housing and homeownership<sup>29</sup>. The number of social housing units has severely declined, going from "20,000 to 30,000 units in the 1970s to just 1,000 to 2,000 after 1994," contributing to the lack of sustainable housing options today<sup>30</sup>.

According to Canadian housing policy expert Steve Pomeroy, **Canada lost more than 320,000 affordable rental housing between 2011 and 2016**.<sup>31</sup> The envisioned 150,000 affordable homes built through the National Housing Strategy do not come close to even counteracting the current loss rate. "The Canada Mortgage and Housing Corporation (CMHC) has estimated we need to build 5.8 million new housing units by 2031, and we estimate at least 2 million of these units need to be rented. But the truth is, Canada has only built 570,000 rental units in the last 30 years<sup>32</sup>."

For the federal government to fulfill its obligation of the right to housing for all, housing policies must drastically increase funding for affordable housing within the National Housing Strategy and prevent further loss of affordable housing due to financialization and renovations. **The current lack of regulations on the financialization of housing and its significant spike in rent prices force survivors and their children back to their original abuser or in other vulnerable states.**

## **RECOMMENDATIONS - ENACTING HUMAN-RIGHTS-BASED HOUSING POLICIES**

### **Recommendation 1: Stop the financialization of housing to curb the impacts on survivors and their children.**

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<sup>28</sup> Tranjan, R. (7.8.2023) "There Is No Housing Crisis." The Walrus. Online: <https://thewalrus.ca/there-is-no-housing-crisis/?lid=nukd99apx2mn>

<sup>29</sup> Thompson, S. (2022). "Homes not shelters": co-productions of home in financialized social housing for women in Vancouver, Canada. *Urban Geography*, 1–19. p. 670. <https://doi.org/10.1080/02723638.2021.2014668>

<sup>30</sup> Idem.

<sup>31</sup> Steve Pomeroy. "Recovery for all. Proposals to Strengthen the National Housing Strategy and End Homelessness." Canadian Alliance to End Homelessness (July 2020). Online: <https://caeh.ca/wp-content/uploads/Recovery-for-All-Report-July-16-2020.pdf>

<sup>32</sup> Brooks, M. P. M. C., Tim Richter, Michael. (2023, August 14). Overhaul of Canada's housing system needed. Toronto Star. [https://www.thestar.com/opinion/contributors/overhaul-of-canada-s-housing-system-needed/article\\_1a701317-199c-5853-9c77-9aa46da47601.html](https://www.thestar.com/opinion/contributors/overhaul-of-canada-s-housing-system-needed/article_1a701317-199c-5853-9c77-9aa46da47601.html)

**The federal government should redefine its housing policies as human-rights-based and align with its responsibility to realize the right to housing for all.** This means preventing further financialization of housing, dominated by REITs that prioritize the best interest of their shareholders instead of the most vulnerable. Housing policies have neglected the building of social housing for decades and focused on corporate investments and homeownership for the middle class. The federal government must now show its full commitment to fostering affordable and off-market housing, which has to include specific and permanent programs for the identified priority groups such as survivors and their children.

Taking the data from Scotiabank's recent report, **the federal government should double the existing number of social housing across Canada**, putting us in the OECD and G7 average, though still below many European countries<sup>33</sup>.

In addition to drastically needing investment in affordable housing, **the federal government should disincentivize financialization through tax regulation amendments.** REITs enjoy preferential tax status through the Federal Income Tax Act, which exempts REITs from paying the general statutory corporate income tax rate. ACORN Canada calculated that if taxes are at the same rate as non-REIT corporations, the federal government could have collected an additional CAD \$1.2 billion in taxes toward social housing, per se<sup>34</sup>.

**Instead of providing tax exemptions for REITs, the federal government should offer tax credits for developers that establish extremely affordable housing options for low-income households.** Additional safeguards would ensure that those units cannot be bought and flipped.

Tax regulations also encourage so-called "planned obsolescence." For developers, demolishing and rebuilding an entire building is financially more lucrative than renovating an existing one. This not only has an enormous environmental footprint, but it also takes much longer to create much-needed new rental units.<sup>35</sup> "In the midst of a housing crisis, millions of square footage of space in existing buildings – both residential and commercial, available without any new foundations to pour or infrastructure services to install – go unutilized because longstanding national policy encourages those structures to be levelled <sup>36</sup>."

**The federal government should ensure that co-ops and land trust organizations have prioritized access to affordable rental buildings or office-to-housing conversions when they come on the market to prevent further loss of affordable housing units.**

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<sup>33</sup> Scotiabank. "Canadian Housing Affordability Hurts" January 18, 2023. Online: <https://www.scotiabank.com/ca/en/about/economics/economics-publications/post.other-publications.insights-views.social-housing--january-18--2023-.html>

<sup>34</sup> ACORN Canada. (2022) "Rein in the REITs" ACORN Canada. Online: [https://acorncanada.org/wp-content/uploads/2022/04/Rein-in-the-REITs\\_English\\_0.pdf](https://acorncanada.org/wp-content/uploads/2022/04/Rein-in-the-REITs_English_0.pdf)

<sup>35</sup> Grafton, Ken; Denhez, Marc. "CMHC is supportive of renovations, but our tax laws are not." Policy Options. April 25, 2023. Online: <https://policyoptions.irpp.org/magazines/april-2023/demolition-renovations-conversions-tax-laws/>

<sup>36</sup> Idem

These are but a few measures the federal government could implement to demonstrate its national housing policies are designed to progressively realize the right to housing for all, particularly the most vulnerable. Preventing any further financialization of housing while drastically investing in more affordable housing must be one of the top priorities. Numerous studies exist with specific best practice examples and promising solutions on how this can be achieved<sup>37</sup>.

## **Recommendation 2: Clearly define “affordability” across all programs and funds**

A clear definition of “affordability,” such as proposed by the Housing Assessment Resource Tool (HART)<sup>38</sup>, would ensure that corporate developers do not use a median income measurement, which often inflates rent prices and is not affordable for low or medium-income households.

## **Recommendation 3: Collect disaggregated data on the housing situation and needs of survivors fleeing domestic violence, including Economic Abuse.**

Under international law, Canada needs to progressively realize the right to housing, starting with the most vulnerable and the most in need. It is hard to effectively address a problem and a target audience without knowing the scope, nature and root causes.

While Statistics Canada regularly collects and publishes data on women in shelters or women and homelessness, not much comprehensive data exists on women fleeing violence.

**CCFWE urges the federal government to collect disaggregated data of survivors with various intersectional realities and forms of experienced abuse to receive a holistic overview of the extent and nature of the systemic barriers that survivors face in the current housing system and where policies hinder their right to housing.**

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<sup>37</sup> Leilani, F. et al (2022) "The Shift Directives. From Financialized to Human-Rights-Based Housing." The Shift. Online: <https://make-the-shift.org/wp-content/uploads/2022/12/Directives-Updated-Dec-9.pdf>; Richter, T. et al. (2023) "The National Housing Accord A Multi-Sector Approach to Ending Canada's Rental Housing Crisis." Online: [https://assets.nationbuilder.com/caeh/pages/453/attachments/original/1692060486/2023\\_National\\_Housing\\_Accord.pdf?1692060486](https://assets.nationbuilder.com/caeh/pages/453/attachments/original/1692060486/2023_National_Housing_Accord.pdf?1692060486)

<sup>38</sup> Housing Research Collaborative. "Housing Assessment Resource Tools" The University of British Columbia. Online: <https://hart.ubc.ca/>

## **Recommendation 4: Prioritize survivors' rights to have safe and secure housing, ensuring their right to a life without harm and violence, fulfillment and enjoyment of family and private life.**

As mentioned throughout this submission, access to safe and secure housing is one of the essential prerequisites for women to leave an abusive relationship. On the contrary, the lack thereof often becomes a top reason for survivors to return to their abuser.

CCFWE gladly sees survivors as one of the National Housing Strategy's priority groups. CCFWE also welcomes the federal government's recently launched National Action Plan to End Gender-Based Violence (GBV) and its commitment to work towards a GBV-free Canada. The fulfillment of the right to housing for survivors and their children is closely linked.

The recently published report by the Mass Casualty Commission strongly reiterates that GBV and domestic violence are not private issues but have to be seen as public health concerns. CCFWE also applauds those cities such as Toronto that recently declared intimate partner violence and GBV an epidemic. The commission report made it very clear: **Violence against women and children is not inevitable.**

Prioritizing long-term secure housing for women and children fleeing violence would prevent further GBV. The quicker survivors feel secure and heal from their violent past, the sooner they can shape their own lives, regain financial health, and become active members of society. Canada can also prevent future homelessness as studies confirm that adolescents who have experienced homelessness as children are at a much higher risk of homelessness as adults<sup>39</sup>.

More funding is needed to build affordable and safe housing in light of the current housing crisis. However, in the meantime, disincentivizing and implementing stricter controls on the financialization of housing would be a crucial step for the federal government to limit the loss of affordable housing and consequently significantly impact the lives of women and children fleeing abuse.

**Survivors mentioned that they do not want to be passive receivers of social assistance and living in shelters but be actively shaping their housing experience to create a home for themselves and their children<sup>40</sup>. By making this a priority for housing policies, the federal government lives up to its commitment toward realizing the right to housing for all and to prevent and work to end GBV in Canada.**

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<sup>39</sup> Gaetz, S. (2016) "The State of Homelessness in Canada 2016." Canadian Observatory on Homelessness Press. Online: [https://homelesshub.ca/sites/default/files/SOHC16\\_final\\_20Oct2016.pdf](https://homelesshub.ca/sites/default/files/SOHC16_final_20Oct2016.pdf)

<sup>40</sup> Thompson, S. (2022). "Homes not shelters": co-productions of home in financialized social housing for women in Vancouver, Canada. *Urban Geography*, 1–19. <https://doi.org/10.1080/02723638.2021.2014668>

## **Recommendation 5: The National Housing Council calls Ms. Meseret Haileyesus, Founder and Executive Director of CCFWE as a witness**

CCFWE recommends that the National Housing Council calls Ms. Meseret Haileyesus, Founder and Executive Director at CCFWE as witness. As Black survivor herself, she experienced first hand the systemic barriers that many women fleeing violence are facing. Through her work, she can also recount on her advocacy work on behalf of Economic Abuse survivors.

## **CONCLUSION**

CCFWE urges the National Housing Council to take the appropriate action to protect and promote the right to adequate housing for women and children fleeing violence in relation to the financialization of purpose-built rental housing in Canada.

## **AUTHOR**

### **About the Canadian Center for Women's Empowerment (CCFWE)**

The Canadian Center for Women's Empowerment (CCFWE) is the only Canadian national non-profit organization based in Ottawa dedicated to addressing Economic Abuse and injustice through advocacy, education, research, economic empowerment, and policy change.

CCFWE works collaboratively with organizations and individuals to develop a comprehensive approach that enables domestic violence survivors to recover from Economic Abuse. It also addresses critical policy gaps preventing survivors from recovering and becoming economically secure and independent.

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