

February 13th, 2017

SENT BY ELECTRONIC TRANSMISSION TO: [Chris.ballard@ontario.ca](mailto:Chris.ballard@ontario.ca)

The Honourable Chris Ballard, Minister of Housing and Minister Responsible for the Poverty Reduction Strategy  
Ministry of Housing  
Minister Responsible for the Poverty Reduction Strategy  
17th Floor - 777 Bay Street  
Toronto, Ontario M5G 2E5

**Re: Survivors of Domestic Violence – Portable Housing Benefit**

Honourable Minister Ballard:

We want to commend you for making funding available to the City of Toronto through the Survivors of Domestic Violence – Portable Housing Benefit. We understand the pilot's key goals are to reduce the amount of time it takes for survivors of domestic violence to find safe, affordable housing, as well as to learn which services and supports most effectively enable housing stability.

Our goal in writing this letter today is to share our experience and provide recommendations on the process undertaken during the design, development, and implementation of this program both at the municipal level in Toronto as well as at the provincial level. We look forward to continuing the conversation on this important initiative beyond this brief letter.

First, we would like to thank the City of Toronto for submitting their Expression of Interest for this important pilot in the Spring of 2016. At that time, we initiated contact with Housing Connections to support the development, design, and implementation of their pilot, given that we understand the urgent need to address the lack of affordable housing, the backlogged wait-list for social housing and the lack of transitional housing options for victims of violence. In our everyday work, we witness the struggles victims of violence, particularly women on low or no income, face to secure safe and affordable housing.

In April 2016, we developed and submitted to Housing Connections a document highlighting challenges and recommendations for accessing safe and affordable housing in Toronto. Our goal was to ensure crucial information could be made available about the important challenges currently experienced by service providers but most importantly victims of violence. The VAW sector in Toronto has past experiences working with Housing Connections in designing and administering subsidy and housing allowance programs. We expected this current pilot to draw upon the best practices we learned in those past initiatives. Additionally, we expected the pilot be informed by

research that outlines criteria housing benefit programs must adhere to to ensure success.<sup>1</sup> We were hopeful this information could and would, to some extent, inform the development of the Portable Pilot Program.

Although our intention was to engage in a collaborative discussion about the design and development of the pilot program, we found it difficult to make suggestions, given that consultations with VAW stakeholders were undertaken after the program was already designed. Furthermore, the time requested to be consulted was onerous with very minimal impact in the final design of the program.

We believe our input and comprehensive understanding of the VAW service needs within the Toronto region in regards to the referral process were not genuinely considered by Housing Connections. We were also concerned that the Toronto Regional Office of the Ministry of Community and Social Services was not brought in for consultation, given the direct impact this pilot will have on Violence Against Women service provision.

As Violence Against Women service providers, we believe we have a vantage point that enables us to have a fuller understanding of the complexity of Toronto as it relates to violence against women, and more importantly, a vantage point that focuses on ensuring any system that is put in place will not harm or re-victimize women.

In the spirit of collaboration, and based on our expertise on the unique housing situation within the Toronto Region, we would like to draw attention to some of the specific recommendations that have the most potential to create unintended negative outcomes:

- **Provincial eligibility requirements must broaden this pilot to support women and their dependents who are not eligible for the Special Priority Program.** This pilot is only for women who are eligible for the Special Priority Program (SPP) for victims of domestic violence. One of the outcomes of this pilot is to ensure that shelters are not at capacity with residents who are waiting for housing. This pilot fails to recognize that there are problems with the current SPP eligibility criteria. Many women and dependents residing in Violence Against Women's (VAW) shelters are not eligible for the SPP mainly due to their inability to prove cohabitation with the persons they are fleeing, or as it is the case as of late, they can't prove dependency on the familial relationship. In order for such benefits to be successful, they must be universal.<sup>2</sup>
- **The benefit should be available to women and their children for a full two years upon entry into the program as originally designed.** These types of housing vouchers must be ongoing to provide stability for low-income women, particularly in the current labour market where there is a gendered, racialized wage gap and where immigrant and racialized women are increasingly clustered in precarious and part-time employment.<sup>34</sup> We understand that this pilot was only intended for a two-year duration, however the implementation timeline compromises the timeframe originally designated for this pilot. Consequently, women and their dependents will only have approximately one year to benefit from this housing allowance, not two years as

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<sup>1</sup> Paradis, Emily. Can a National Housing Benefit Help Families Facing Homelessness? The Homeless Hub, January 2017. <http://homelesshub.ca/blog/can-national-housing-benefit-help-families-facing-homelessness>.

<sup>2</sup> Ibid.

<sup>3</sup> Block, Sheila and G.Edward-Galabuzi. Canada's Colour Coded Labour Market: The Gap for Racialized Workers. Wellesley Institute. March 2011. [http://www.wellesleyinstitute.com/wp-content/uploads/2011/03/Colour\\_Coded\\_Labour\\_MarketFINAL.pdf](http://www.wellesleyinstitute.com/wp-content/uploads/2011/03/Colour_Coded_Labour_MarketFINAL.pdf)

<sup>4</sup> Stapleton, John. The Working Poor in the Toronto Region. April 2015. <http://metcalffoundation.com/wp-content/uploads/2015/04/WorkingPoorToronto2015Final.pdf>.

originally funded. Low-income women and their dependents needing this benefit should not be penalized for the provincial and municipal's slow roll-out of the program.

- **Applications on the Special Priority Program should not be made inactive when women receive this temporary housing benefit.** Initially, we were informed that women participating in this pilot would be made inactive in the SPP waiting list as soon as they are accepted into this pilot. Housing Connections intended to re-activate women at the end of their participation in the pilot (March 2018). Our concern was that the average timeframe for households to get an offer (depending on the size of their family and unit needed) is approximately 6 to 8 months, and in some cases up to one year or more. Therefore, this meant that if their names are made active only at the end of the pilot, it will take women that much time to get an offer. This is problematic for women who will not be able to continue paying their rent once the portable housing allowance runs out. Although the Housing Connections has on many occasions expressed their optimism that the allowance would continue, they have not committed or guaranteed that this would be the case. The problem is that women that can't afford their rent, will most likely become homeless or use city homeless shelters because they would no longer be eligible for violence against women's shelter. Recently, we were informed during Orientation Sessions provided by Housing Connections to front line staff, that this decision was changed to inactivate citizens only for six months, which is better, but still not optimal.
- **This program must not abandon women to the private market.**<sup>5</sup> Wrap around supportive services were not considered to ensure women's housing sustainability in this pilot. By the time we were brought into consultation, our proposed suggestion was to use of some of the administrative funds provided by the Ministry (10% totaling \$341,442.00), to fund critical VAW positions that could provide the much needed wrap-around support services. This vital expense line could have been built from the initial stage of preparing the submission, had sector representatives been brought into the consultation initially.
- **The eligibility criteria must not create barriers for women.** For example, the Ministry of Finance requires that women have their 2015 income tax returns filed. Although we understand this is a requirement that currently exists when households on the special priority program list get a housing offer, the problem, in this case, is that the time frame for the application process does not allow women, who have complex needs, to complete their income tax filing. Once again, this pilot did not allocate any resources for the VAW sector to help clients access supports that will make them eligible for the pilot. Instead, Housing Connections is using 10% of the total funds on administrative costs for this pilot to hire 3 full-time positions, to process 358 applications when most of the work in completing the forms, screening and assessment, helping clients gather the necessary documents to meet the eligibility criteria will be left for the VAW frontline staff.
- **Communication and marketing must be clear, consistent and in plain language.** This must apply to low-income women who are the target of this program so that they fully understand the program and impacts, both positive (temporary relief for private market rent) and negative (finite

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<sup>5</sup> Buron, Larry et al. Housing Choice Vouchers: How HOPE VI Families Fared in the Private Market. Urban Institut, 2007 (<http://www.urban.org/research/publication/housing-choice-vouchers>)

benefit, will not be able to access VAW shelters if program is not extended, possible clawback by provincial social assistance program) as well as to the VAW sector front-line staff and management, who will likely be making referrals to women to this program and providing ongoing transitional support and case management.

- **We strongly recommend an awareness-raising campaign for private landlords to better understand and respond to VAW issues.** There was no planned marketing and communication strategy to target and engage private landlords in regards to this strategy with the goal of raising awareness regarding the intersection between woman abuse/domestic violence and women's homelessness. For example, some clients may not meet the requirement that private landlords have around reference and credit scores. There needs to be a consideration for women who, as a result of financial abuse, have incurred tremendous debt. Once again, it is left to the already strained VAW sector to enter into these negotiations, without any additional resources.

We look forward to ongoing collaboration with both Ministries on this issue and would like to express our interest in meeting to discuss our role in the design and implementation of Housing programs that will better meet the needs of women who have experience violence.

Respectfully,

Harmy Mendoza, Executive Director, Woman Abuse Council of Toronto ("WomanACT")

Silvia Samsa, Executive Director, Women's Habitat of Etobicoke and Violence against Women Network ("VAWN")  
Co-Chair

Arlene McCalla, Co-Executive Director, Interval House and Violence against Women Network ("VAWN") Co-Chair

Leila Sarangi, Transitional and Housing Support Program ("THSP") Network Co-Chair

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