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THE NEED FOR PERMANENT SUPPORTIVE HOUSING:

An Intersectional Policy Analysis of COVID-Related Housing Policies

A University of Guelph COVID Catalyst Research Project, 2021

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About the Research

This document presents our analysis of housing-related policies implemented during the initial months of the COVID-19 pandemic.¹ We examined all housing related legislation enacted from March 15th to June 30th, 2020 by the federal government, the province of Ontario, and the regions of Dufferin, Guelph and Wellington. We also considered the government's efforts to engage with people most affected by the policies in question.

It is part of a series highlighting key findings and policy recommendations that emerged from a project aimed at better understanding the impacts of COVID-19 on the day-to-day lives of people living with poverty in small urban and rural communities; and identifying and responding to policy gaps in government responses to the pandemic.

Our analysis of the above-noted housing policies (see also Table 1) is informed by five scoping interviews with service providers; interviews and focus groups with 23 participants who self-identified as living with poverty; and a scan of relevant literature. We used a mode of policy analysis called “intersectionality-based policy analysis” or IBPA. Drawing on the Black feminist conceptualization of intersectionality, IBPA examines how the complex interrelation of different dimensions of identity can inform our understanding of public policies.² This research was funded by a University of Guelph COVID-19 Catalyst Grant and conducted in partnership with A Way Home Canada (AWAC), the Guelph-Wellington Taskforce for Poverty Elimination (GWTPE), and Services and Housing in the Province (SHIP).



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The Problem: Housing Insecurity in Small Urban and Rural Communities

The COVID-19 pandemic brought into focus myriad housing challenges in Ontario. From shelters unable to provide physical distancing, to tenants one paycheque from eviction, to households with unsustainable mortgage burdens, our fragmented, reactive, and expensive housing system was exposed. Like many regions proximate to the Greater Toronto Area (GTA), Dufferin County, Wellington County and the City of Guelph have experienced declines in housing affordability in recent years due

¹ The analysis and writing were completed by Drs. Laura Pin and Leah Levac, with support from Erin Rodenburg, Kelly Hatt, and Jee-Ho Paik. This policy brief was reviewed by Drs. Deborah Stienstra, Belinda Leach and Kate Parizeau, as well as staff from partner organizations AWAC, GWTPE and SHIP.

² Hankivsky, O., Grace, D., Hunting, G., Ferlatte, O., Clark, N., Fridkin, A., & Laviolette, T. (2012). Intersectionality-based policy analysis. In O. Hankivsky. (Ed.). *An Intersectionality-Based Policy Analysis Framework*, pp. 33-45. Institute for Intersectionality Research and Policy, Simon Fraser University.

to rising rental and housing costs.³ In Dufferin, Guelph and Wellington, more people than ever before are on subsidized housing waitlists, a problem compounded by a lack of affordable rental units. For example, from 2013-2018 in Dufferin County, the number of subsidized housing spaces increased by 4%, while the waitlist increased by 27%.⁴

The COVID-19 pandemic created further challenges for many people already experiencing housing instability. Early in the pandemic, an Angus Reid poll revealed that 34% of households had recently experienced – or were worried about – being late paying their rent or mortgage.⁵ In response to these concerns, the federal and provincial governments undertook a number of housing-related policy developments, outlined in Table 1.⁶

Table 1. Major Residential Housing Policy Responses by Federal and Provincial Governments in Response to COVID-19

	Program	Change	Spending ⁷
Federal gov't	National Housing Act	Amendments to mortgage insurance eligibility criteria, set out in regulations made under the National Housing Act and Protection of Residential Mortgage or Hypothecary Insurance Act	\$5.8 billion
	Emergency Community Support Fund	Support to help charities and non-profit organizations serve and support vulnerable Canadians during the COVID-19 pandemic	\$350 million
	Reaching Home	Updated the eligibility requirements to make the program more accessible for people at risk or experiencing homelessness	\$157 million.
	WAGE	Additional funding delivered through WAGE for women and children fleeing gender-based violence	\$40 million
	Indigenous Services Canada	\$10 million to Indigenous Services Canada's existing network of 46 emergency shelters on reserve and in Yukon \$19.4 million for new shelter operations to support Indigenous women and girls	\$29.4 million
Ontario gov't	EMCPA	Suspending Time of Use (TOU) rates, holding electricity prices to the lowest rate	\$1.5 billion
	Evictions enforcement	Pausing the enforcement of residential evictions from March 2020-July 2020	no additional spending
	Landlord Tenant Act	Payment to tenants for renovictions; Permitting landlords to sue former tenants for arrears through the board	no additional spending

³ Our focus group and interview data are concentrated in Dufferin County, Wellington County and the City of Guelph, areas that roughly correspond to the geographic boundaries of the Wellington-Dufferin-Guelph Public Health Region: <https://www.wdgppublichealth.ca/your-community/emergency-preparedness/emergency-response-plan/region-wellington-dufferin-and-guelph>

⁴ Housing is Key: Five Year Update: Dufferin County 10-year Housing & Homelessness Plan. <https://www.dufferincounty.ca/sites/default/files/housing/Dufferin%20County%2010-Year%20Housing%20and%20Homelessness%20Plan%20Updated%202019.pdf>

⁵ <http://angusreid.org/covid-19-economic-impact-canada/>

⁶ Information concerning policy developments compiled using government data sources including news releases and policy updates provided by the Canadian federal government and the Ontario government including the Canada Gazette and the Ontario Gazette.

⁷ This column reflects estimated new spending from March 2020 to December 2020.

As discussed below, our analysis indicates that people living with poverty in rural and small urban communities – whose experiences are also shaped by their gender, disability, age, parenting status, ethnicity, and other dimensions of identity – remained largely invisible in both provincial and federal housing-related policy responses. We document four main ways the exclusion of people living with poverty occurred in housing support policies enacted in response to COVID-19:

- By overlooking the needs of low-income tenants
- By creating related gaps in income supports
- By providing temporary and limited support rather than addressing structural housing vulnerabilities
- By excluding people with lived experience of poverty from policy development and evaluation

Low-Income Tenants Left Out. Over 90% of federal funding for housing in response to COVID-19 went to financial institutions

– primarily banks – through the federal government’s purchase of insured mortgages to provide liquidity to the financial sector.⁸ In turn, major financial institutions permitted residential mortgage holders to pause mortgage payments for six months if they could demonstrate significant income impacts due to the COVID-19 pandemic.⁹

In contrast, the additional funding provided through Reaching Home and the Emergency Community Support fund for shelters and other service providers was relatively modest – \$500 million for the entire country – and organizations had to submit applications to receive additional funds, something that required significant labour on the part of front-line service providers during a crisis.

In Dufferin County, the City of Guelph, and Wellington County, like elsewhere in Ontario, people who rent their homes are more likely than homeowners to struggle with housing affordability (see Table 2).

Table 2. Housing Affordability Indicators in Guelph-Wellington and Dufferin, 2018

Criteria	Category	Guelph-Wellington	Dufferin County ¹⁰
Households spending more than 30% income on housing	Renters	38%	45%
	Owners	15%	21%
Households in core housing need	Renters	26%	36%
	Owners	5%	7%

⁸ For more details about the Federal government’s insured mortgage purchase plan, see: <https://www.progressive-economics.ca/2020/04/ten-things-to-know-about-cmhcs-insured-mortgage-purchase-program/> and <https://www.cmhc-schl.gc.ca/en/professionals/project-funding-and-mortgage-financing/mortgage-loan-insurance/insured-mortgage-purchase-program>

⁹ Although mortgage payments were paused, interest continued to accrue, meaning anyone who took a mortgage “vacation” will end up paying more interest to the mortgage holder over the term of the mortgage.

¹⁰ Data compiled from: A Place to call Home: Five Year Update. 10-year Housing and Homelessness Plan for Guelph-Wellington. https://www.wellington.ca/en/social-services/resources/Housing/A-Place-to-Call-Home_Five-Year-Update-Final.pdf and Housing is Key: Five Year Update: Dufferin County 10-year Housing & Homelessness Plan. <https://www.dufferincounty.ca/sites/default/files/housing/Dufferin%20County%2010-Year%20Housing%20and%20Homelessness%20Plan%20Updated%202019.pdf>

The federal government did not provide direct assistance to residential renters, nor did it provide funding to provinces to provide rental assistance. It only encouraged provinces to establish individual rent support programs. In Ontario, Bill 184 was promoted as protecting tenants, but it provided no funding for tenant assistance, and in many ways increased the vulnerability of tenants to evictions.¹¹

In sum, as local data from Dufferin and Guelph-Wellington indicate, renter households are more likely to live in unaffordable housing, and to spend a greater proportion of their income on housing. These are two markers of financial vulnerability that make people vulnerable to sudden changes, such as the loss of employment, or increased living costs. Yet in the wake of the pandemic, renters were largely excluded from federal and provincial housing assistance.

Gaps in Income Support Led to Housing Vulnerability. Early in the pandemic, the federal government described its income support policies, particularly the Canada Emergency Response Benefit (CERB), as focused on “keeping a roof over Canadian’s heads”. But gaps in eligibility for COVID-19-related income assistance meant that significant groups of low-income renters – such as people receiving social assistance, lone-parents, youth, and disabled people – were less likely to qualify for additional funds.¹² Second, for low-income renters who did qualify for COVID 19-related financial assistance, the amount of assistance was insufficient to both pay rent and meet day-to-day living costs in high-cost rental markets. This included areas like Dufferin County, where average rents for a one-bedroom apartment are 70% of the CERB payment.¹³ As a result, many tenants fell behind in rent payments. One participant, a young, racialized man who was unable to access CERB described his situation as follows, “*During that first April, May, I was absolutely not able to pay rent. It really shook everything up and I was*

not sure what to do and it was very, very, very stressful”. Another participant recalled how at the start of the pandemic she had become homeless:

“I’m living in a motel because I couldn’t afford market rents...Market renters wouldn’t rent to me because my minimum wage income was not enough for their ratio for market rent, one bedroom apartment.

This participant had a disability as well which limited the hours she could work, particularly during COVID.

The provincial government provided no funding to assist residential tenants with rental costs. Rather, the major area of housing support spending was to lower hydro prices (see Table 1). The Ontario government estimated the average family would save only \$20 per month, an

¹¹ Among its provisions, Bill 184 brought about changes to the Landlord Tenant Act that require landlords to compensate tenants for renovations, but do not prevent this process. Bill 184 also expanded the mandate of the Landlord Tenant Board to permit landlords to sue for rental arrears even after a tenancy has ended, removed rights of tenants during Landlord Tenant Board hearings, and introduced measures designed to protect landlords’ investments. For example, tenants can be made to sign a repayment agreement and then be evicted for failing to meet the (potentially unreasonable) terms of the agreement. See *Policy Options: Ontario’s Bill 184 and the Myth of Tenant Protection*. <https://policyoptions.irpp.org/magazines/september-2020/ontarios-bill-184-and-the-myth-of-tenant-protection/>

¹² For more details, see our policy brief on income support: COVID-19 Policy Responses: Unequal Income Support and the Case for a Universal Basic Income

¹³ Housing is Key: Five Year Update: Dufferin County 10-year Housing & Homelessness Plan. <https://www.dufferincounty.ca/sites/default/files/housing/Dufferin%20County%2010-Year%20Housing%20and%20Homelessness%20Plan%20Updated%202019.pdf>

amount that is lower for those with small homes, and for tenants. While the Ontario government temporarily paused the enforcement of most evictions in response to the COVID-19 pandemic, eviction orders continue to be issued. One participant with a disability explained the stress this caused at the beginning of the pandemic:

“ I would let my landlord know that I had two kids at home and instead of paying at the beginning, I would pay at the end of the month. Myself and a number of other tenants have got the M4s...even though there was a freeze on evictions, they were still pulling the legal papers and threatening people, and people were still scared that they were going to get evicted.

Predictably, once the moratorium on enforcement was lifted in July 2020 even as the pandemic continued, the number of eviction hearings and enforcement orders increased dramatically.¹⁴ And evictions have disproportionately affected low-income frontline workers and people on social assistance, two groups more likely to be disabled and/or racialized.¹⁵

Temporary and Limited Support. The federal Reaching Home and WAGE investments were important for addressing immediate safety needs for community housing service providers. For example, one participant discussed how in response to COVID-19 at the local shelter, *“they had to move everyone into separate rooms, kind of shows that perhaps that should have been [in separate rooms] all along. And also, the fact that I know that there’s now quite a waiting list, for rooms”*. While one-time funds were important for enabling front-line service organizations to respond to immediate needs as COVID-19 became a global pandemic, the COVID-19 pandemic is ongoing, and heightened impacts on housing and homelessness continue to be experienced by people living with poverty. The one-time approach also upholds the

assumption that emergency interventions, which continue to function as temporary “band-aid” solutions, are sufficient. This strategy persists while the long-term needs of people living with poverty for safe, affordable and stable housing options continue to be sidelined in federal and provincial policy. As one service provider explained, *“If you look across the board, people in deep poverty just cannot afford the most affordable housing that is being offered. Without social housing and you know, housing projects, the people wouldn’t be able to live”*.

Participatory and Geographic Exclusions. The federal and provincial responses to COVID lacked sensitivity to geographic factors impacting rural and small urban communities such as Dufferin County, Wellington County, and the City of Guelph.¹⁶ As one service provider shared,

“ I do worry from a national perspective that rural and remote communities are still going to be left out of the conversation about funding for housing.

Because supports are delivered through existing not-for-profits, geographic and other exclusions that exist in this model of service delivery continue. In communities without shelters and/or with limited housing services (such as Wellington and Dufferin), access to additional

¹⁴ Wane, Njoki. 2020, Nov. COVID-19: The Pandemic & Histories of Inequities Unveiled Impact on Black Communities. <https://rsc-src.ca/en/covid-19/covid-19-pandemic-histories-inequities-unveiled-impact-black-communities>

¹⁵ Leon, Scott, and Iveniu, James. 2020. Forced Out: Evictions, Race, and Poverty in Toronto. <https://www.wellesleyinstitute.com/wp-content/uploads/2020/08/Forced-Out-Evictions-Race-and-Poverty-in-Toronto-.pdf>

¹⁶ An important exception to this is the funds provided to Indigenous Services Canada for new and existing shelters on reserve and in the Yukon.

federal Reaching Homes funds was limited. Some local governments attempted to redirect funds towards housing. For example, the City of Guelph directed an additional \$1.48 million towards emergency housing support programs. Rural and small urban communities, however, have limited financial means to address housing, and limited ability to influence federal and provincial regulatory decisions. In practice, this means that local levels of government are often left to deal with the consequences of federal and provincial actions, or inactions. The consequences of this government inaction are greater for groups more likely to be struggling with housing: people on social assistance, low-income workers, lone parents, and youth. As a key informant pointed out, “[the pandemic has] highlighted that we don’t really have very great solutions for housing for young people when they can’t stay home, when home’s not safe and when they don’t have any safe alternatives”. Youth may have lacked sufficient work earnings to qualify for CERB, and the Canada Emergency Student Benefit was much more limited in duration and eligibility. For youth not in their final year of high school nor enrolled in post-secondary education, income and housing supports during COVID-19 have been limited.

Finally, there is little to no evidence of public participation being sought in the development of housing support policies in response to the COVID-19 pandemic. While moving quickly in an emergency is important, given the ongoing nature of the pandemic, as well as the potential of digital technologies of public engagement, this is an important absence. Public engagement in policy development helps mitigate the uneven access to decision-makers that results from the current lobbying system at the federal and provincial levels. Moreover, many service agencies and advocacy groups quickly put forward explicit policy recommendations concerning housing support, indicating that analysis and

consultation work can be done quickly when it draws on existing expertise and knowledge. Public engagement in policy development and evaluation is important because it draws attention to limitations and challenges in existing modes of service provision. Housing providers, and people without access to safe and affordable housing, are well positioned to highlight housing-related needs.

People Living with Poverty Deserve Safe and Appropriate Housing

Overall, the COVID-19 pandemic is shining a light on our fragmented, reactive, and expensive housing system, and on the government’s preference for short-term “band-aid” responses over long-term sustainable solutions, like permanent supportive housing. In many cases, municipalities and counties were left to cobble together solutions, which meant that people living in communities without strong supportive housing infrastructure may have been additionally compromised. Our analysis makes clear the need for flexible, permanent, supportive housing options. These options must address the unique experiences of people living in rural and small urban communities, including those – such as youth, people with disabilities, lone parents, and racialized people – whose housing-related needs warrant unique attention.

