

June 1, 2018

Human Rights-Based Approach to Housing Team  
Canada Mortgage and Housing Corporation  
700 Montreal Rd  
Ottawa ON K1A 0P7

Re: Commentary on National Housing Strategy's *Discussion Paper: A Human Rights-based Approach to Housing*

On behalf of the Ontario Housing First Community of Interest (COI), we are writing you to provide feedback on the *Discussion Paper: A Human Rights-based Approach to Housing*. The Ontario Housing First COI is a network of planners, managers, practitioners, people with lived experience, and researchers who are committed to promoting the Housing First approach as one key strategy to end homelessness in Ontario.

The NHS (2018) Discussion Paper speaks of the need for a vision, priorities, principles, and desired outcomes in a rights-based approach to housing. We comment on these and other points in our key messages below.

1. **Vision** – Like CAEH (2018), we believe that **a rights-based approach for the NHS must have an unambiguous focus on preventing and ending homelessness.**
2. **Priorities** – We support the report's prioritization of the housing needs of Canada's most vulnerable citizens (NHS, 2018). This prioritization is consistent with that advocated in other comments on this discussion paper (ACTO, 2018; CAEH, 2018). More specifically, like CAEH (2018), we believe that it is crucial to **prioritize people experiencing homelessness and precarious housing in order to end homelessness in Canada as quickly as possible.** This prioritization should include Indigenous people, who have a long colonial history of poverty, socio-economic inequality and social exclusion, and a high prevalence of homelessness and/or sub-standard housing (Patrick, 2014).
3. **Assumptions** – A human rights approach recognizes that homelessness is largely structural in nature and arises predictably from socioeconomic inequality and social exclusion (UN, 2018). **To prevent and end homelessness, a human rights approach to housing must clearly focus on reducing inequality and exclusion.**
4. **Principles** – Two key principles of a rights-based approach to housing are participation and choice. We agree with Paradis' (2018) emphasis on rights-based participation of people with lived experience of homelessness. As she states, the participation of people with lived experience must not be merely token in nature, but must be more fulsome and supported on a wide scale. Strategies to address barriers to participation must be provided. Rights-based participation is consistent with the Housing First approach, with people with lived experience having choice over all aspects of their housing and support. In particular, **Housing First emphasizes that people should have choice over their**

**housing. To do so, they must have the economic resources, such as a Portable Housing Benefit (PHB), to access quality, market rental apartments or other types of housing. Above all, people should not be assigned to housing by service systems because that housing is all that is available to them.**

Other key principles (e.g., based in law and legal standards) are outlined in a report of the United Nations Special Rapporteur in her report on housing (UN, 2018). Moreover, the UN report provides a checklist for adherence to these principles, which should be used to ensure compliance with housing standards and principles.

5. **Resources – Benefits must be put in place to enable people who are socially and economically marginalized to purchase or rent quality housing.** Like CAEH (2018), we question the utility of NHS’s proposed PHB as a benefit that can end homelessness. **The proposed PHB of \$2,500 per year (just over \$200 per month) is insufficient to allow people experiencing homelessness to find adequate rental accommodations.** The PHB could work if the amount of the benefit were greater and adjusted for rental costs in different Canadian communities (Nelson & Aubry, 2017). But as it is proposed, the value of the PHB would not reduce inequality and would perpetuate social exclusion, leaving homeless people to languish in rooming homes and other sub-standard accommodation.
6. **Monitoring Mechanisms** – The NHS (2018) Discussion Paper presents five new initiatives: a) new legislation, b) a new federal housing advocate, c) a new national housing council, d) a community-based tenant initiative, and e) a public engagement campaign. There is value in these new initiatives. Like others (ACTO, 2018; Porter, 2018), we believe that for these new initiatives to be useful, these bodies must be provided with powers to enforce adherence to human rights principles. For example, the housing advocate must be independent and include an adjudication panel to make recommendations on select systemic issues (Porter, 2018). Moreover, there must be a requirement, that the ministry, cabinet, or parliament must accept or reject these recommendations and provide reasons for their decisions. For a rights-based approach to work, there needs to be monitoring mechanisms set in place to ensure compliance.
7. **Desired Outcomes** – Like CAEH, we believe that the goal of reducing chronic homelessness by 50% in 10 years is inadequate. **A more ambitious goal consistent with a human rights approach is to eliminate chronic homelessness within 10 years.**

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