

January 4th, 2018

SENT BY ELECTRONIC TRANSMISSION TO: Helena.jaczek@ontario.ca; incomesecurity@ontario.ca

The Honourable Helena Jaczek, Minister of Community and Social Services
Ministry of Community and Social Services
Communications and Marketing Branch
7th Floor, Hepburn Block
Toronto, Ontario M7A 1E9

Re: VAW Sector Representatives Recommendations: Income Security - A Roadmap for Change

Honourable Minister Jaczek:

We would like to applaud the Government of Ontario's long-term vision to "reform the income security system to ensure people are treated with dignity and respect." Achieving an income security system that addresses the structural forces that contribute to women's inequality is a high priority for Violence against Women sector representatives and is an essential step to eliminating violence against women.

Our goal in writing this letter today is in response to the recently published report: Income Security: A Roadmap for Change. This response includes coordinated feedback on the report's vision and recommendations and highlights a few key areas that we believe are critical to addressing barriers to women's safety.

We are encouraged by the ambitious recommendations made by the three working groups to the Ministry of Community and Social Services. We are pleased to see recommendations for a universal housing benefit, increased access to health benefits and a transformational change to the legislation and culture that govern and drive social assistance programs.

As Violence against Women (VAW) service providers, we have a deep understanding of the complexity of Toronto as it relates to violence against women. In our work, we witness the challenges that are faced by women survivors and what we have shared in this response are the experiences and concerns that women share with us every day. A co-creation approach that engages people with lived experience is critical in system reform. We welcome the opportunity to continue to collaborate with the Government of Ontario on the design and implementation of an income security system that is more responsive, supportive and pays particular attention to the diverse needs of women across the province.

Intersectional Gender-Based Analysis

We are encouraged that the report identifies a rights-based approach as a guiding principle. However, we are concerned that it does not make a deliberate recommendation to take the specific needs of women into account. Women have different economic and social needs than men and women's experience of the income security system is different than that of men. Income inequality and marginalization is also drawn along Indigenous identity, race, age, family status, ability, sexual orientation and expression in addition to gender, as is violence against women. **An intersectional gender-based analysis must be completed to ensure that the different needs, priorities, interests and responsibilities of diverse groups of women and men are being addressed and integrated adequately.**

Furthermore, we strongly urge the Government of Ontario to ensure that the income security system respects women's rights as reflected in the Convention on the Elimination of All Forms of Discrimination against Women (CEDAW).

Gender, income inequality and violence against women are interconnected. Violence can keep women in conditions of poverty and economic dependence, and poverty or fear of poverty can limit women's choices and keep women from leaving abusive situations.

Women continue to be at a financial disadvantage that leaves them dependent on abusive partners or vulnerable to exploitation. Immigrant women sponsored by their partners and temporary foreign workers are at increased risk of being controlled and/or exploited. 60% of women living with disabilities in Canada will experience some form of violence in their adult lives.¹ Indigenous women are killed at six times the rate of non-Indigenous women in Canada.²

Canadian women are more likely to be engaged in unstable, precarious and low-income employment than men and more likely to hold more than one job than men. Approximately 20% of women aged 25-54 work part-time, compared to 5% of men. The female unemployment rate is 7%, the female Indigenous population unemployment rate is 13% and women who are very recent immigrants have the highest unemployment rate in Canada at 16%.³

Alongside an intersectional gender-based analysis, it is critical that we invest in collecting and analyzing disaggregated data that can be used to assess and adjust policies and strategies. Disaggregated data tells us how close or how far away we are from reaching diverse people. The strategy must also include regular reporting on progress and the reporting must be transparent and public. The meaningful engagement of those with lived experience paired with this robust data can provide a more accurate picture of where policies and programs are closing gaps and where they are falling short.

In addition to highlighting the need for a gender lens to be applied to the income security system, we wanted to respond to two key areas from the report:

Housing Benefit

We welcome the recommendation of a universal and income-tested housing benefit in Ontario. A housing benefit may provide choice for women – choice of where to live when housing supply is available or the option to remain in their homes as circumstances change. As a result of the competitive rental market in Toronto, women's choices are limited. Therefore, we believe a housing benefit will only be successful if paired with measures to increase the supply of affordable and social housing. We believe a housing benefit may help reduce overcrowding in VAW shelters and may allow for a faster response to housing needs, giving women the ability to rebuild their lives sooner.

Family violence is one of the most common causes of homelessness for women and children in Canada.⁴ Furthermore, the lack of affordable and safe housing is one of the main reasons why women continue living in abusive relationships. Currently, women and children are living in Violence against Women shelters in Toronto for 10 to 14 months, sometimes longer, while waiting for housing to become available.

- We recommend that the Government of Ontario works in tandem with the National Housing Strategy to ensure there is an increase in affordable housing that meets the unique needs of Toronto. An investment in housing benefit which creates demand, works best alongside an investment in supply – affordable and

¹ Roeher Institute "Harm's Way: The Many Faces of Violence and Abuse Against Persons With Disabilities" 2005, North York, Ontario

² Miladinovic, Z and Mulligan, L. "Homicide in Canada" Statistics Canada, 2014, Canada

³ Ferrao, V. "Paid Work" Women in Canada: A Gender-based Statistical Report, 2010, Canada

⁴ Novac, S. "Family Violence and Homelessness: A Review of the Literature" Public Health Agency of Canada, 2006, Ottawa

social housing.⁵ The rental market in Toronto is competitive. Some women report that to secure a rental property they have entered bidding wars or have been asked to pay 6 months of rent upfront.

- We recommend that the housing benefit is also delivered through a provincial or municipal administrative body to increase the responsiveness. When women are fleeing violence or have an abrupt change in their circumstances, they require immediate access to support.

In 2016, the Government of Ontario launched a new pilot program: Survivors of Domestic Violence Portable Housing Benefit. The following recommendations are based on our experiences with this pilot that we believe can help inform the design and development of a province-wide housing benefit:

- Removing the Special Priority Program status as part of the eligibility criteria and expanding the program to support all women victims of domestic violence and their dependents will increase the reach and success of the program.
- Wrap around support services alongside a housing benefit are important and promote women's housing sustainability.
- Women leaving abusive relationships are often faced with a poor credit rating and this is something landlords are not willing to negotiate. Policies must support women in improving their credit rating, promote saving and protect assets.
- Women fleeing violence regularly leave with few documents and personal belongings and often have the inability to prove cohabitation with their abuser, or prove familial relationship.
- Benefits should not be clawed back from another system e.g. Social assistance, CCTB
- The benefit should be provided in perpetuity as long as there is need, according to income.

Social Assistance Programs

We are pleased to see a recommendation to fundamentally change the legislative framework for social assistance programs and to create a culture of trust and collaboration.

Based on our experience, women who have experienced violence often encounter social assistance programs that are more focused on rules and obligations than they are on entitlements or exceptions. For example, women continue to report that they are asked to seek spousal support from an abusive partner prior to receiving social assistance. We commend the report for the emphasis on trust and for including mandatory professional development for front-line workers and recommend that this training includes anti-racism, anti-oppression and trauma-informed practice. We further recommend that front-line staff be co-located in the community, including within community-based women's services.

We are happy to see a focus on the importance of analyzing policies to ensure they do not compromise the safety of women fleeing violence. We need to move beyond this and ensure that social assistance policies provide a leg up for women fleeing violence.

- We recommend that women living in shelters should receive social assistance. We welcome the inclusion of flat rates in the social assistance structure, regardless of living situation. Women's lack of access to social assistance while in VAW shelters prevents saving, contributes to debt and limits women's options.
- We recommend that social assistance policies are analyzed to ensure women and children are provided with expedited access to financial resources when escaping abuse, as in line with recommendations made by the jury in the inquests following the death of Gillian Hadley.⁶ Currently, women fleeing violence are

⁵ Webb, K. "Bricks or Benefits, How we can rebalance housing investment" Shelter, 2012, UK

⁶ Hadley Coroner's Inquest Jury Recommendations, 2002, Ontario

unable to apply for social assistance until they have separated from their abusive partner. Women end up staying in an abusive relationship or returning to one when they are financially dependent on an abusive partner.

We once again commend the Government of Ontario for commissioning this important report and congratulate the working groups on pushing for real change. We need to continue to establish social conditions that support women to live free from discrimination and violence. We look forward to ongoing collaboration with the Government of Ontario in creating a fair, responsive and rights-based income security system.

Respectfully,

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

Fatima Valentim, Director, Yorktown Shelter for Women and Violence against Women (VAW) Co-Chair of the Toronto Region CAS/VAW Advisory Committee.

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, Manager, Women’s Habitat of Etobicoke and Counselling Network Co-Chair

Carla Neto, Manager, YWCA Toronto and Transitional and Housing Support Program Network (“THSP”) Co-Chair

APPENDIX A

WomanACT Members

1. Abrigo Centre
2. Assaulted Women's Helpline
3. Barbra Schlifer Commemorative Clinic
4. Catholic Children's Aid Society
5. Catholic Family Services of Toronto
6. Child Development Institute
7. Children's Aid Society of Toronto
8. Elizabeth Fry Toronto
9. Ernestine's Women's Shelter
10. Family Service Toronto
11. Greek Orthodox Family Services and Counselling, VAW Program
12. Interval House
13. Korean Canadian Women Association
14. Legal Aid Ontario
15. METRAC
16. Nellie's Shelter for Women
17. Newcomer Women's Services Toronto
18. Oasis Centre des Femmes
19. Scarborough Women's Centre
20. Springtide Resources
21. South Asian Women Centre
22. Toronto Public Health
23. West Neighbourhood House
24. Women's Habitat of Etobicoke
25. Yorktown Shelter for Women
26. YWCA Toronto

Transitional and Housing Support Program (“THSP”) Network Members

1. Anduhyau
2. Barbra Schlifer Clinic
3. Catholic Family Services
4. Centre for Spanish Speaking Peoples
5. Chinese Family Services of Ontario
6. Dr. Roz’s Healing Place
7. Ernestine’s Women’s Shelter
8. Jewish Family and Child Services
9. Native Child & Family Services of Ontario
10. Korean Canadian Women Association
11. Nellie’s
12. Oasis Centre Des Femmes
13. Society of St. Vincent de Paul (inactive)
14. West Neighbourhood House
15. Thorncliffe Neighbourhood Office and TNO @ Flemingdon Park
16. Tropicana Community Services
17. Women’s Habitat of Etobicoke
18. Yorktown Shelter for Women
19. YWCA Arise
20. YWCA Housing Support
21. YWCA Toronto
22. YWCA Woodlawn

Violence Against Women Network (“VAWN”) Members

1. Women's Habitat of Etobicoke
2. Interval House
3. The Redwood
4. Yorktown Shelter for Women
5. North York Women's Shelter
6. Red Door Family Shelter
7. Nellie's Women's Shelter
8. YWCA Arise-Women and Children
9. YWCA Women's Shelter
10. Julliette's Place
11. Ernestine's Women's Shelter
12. La Maison
13. Dr. Roz's Healing Place
14. Anduhyau Shelter

Counselling Network Members

1. Barbra Schlifer Commemorative Clinic
2. Catholic Family Services of Toronto
3. Centre for Spanish Speaking Peoples
4. Chinese Family Services of Ontario
5. COSTI Immigrant Services
6. Interval House
7. Jewish Child and Family Services
8. KCWA Family Services
9. West Neighbourhood House
10. Women's Habitat of Etobicoke
11. Yorktown Shelter for Women
12. Abrigo
13. Anduhyaun
14. Child Development Institute
15. The Etobicoke Children's Centre (WESAT)
16. Family Service Toronto
17. Greek Orthodox Family Services and Counselling, VAW Program
18. Jamaican-Canadian Association
19. Native Child and Family Services
20. Parkdale Community Health Centre
21. Riverdale Immigrant Women's Centre
22. Settlement Assistance and Family Support Services (SAFSS)
23. Support Enhance Access Services (SEAS)
24. Thorncliffe Neighbourhood Office
25. Tropicana Community Services
26. YWCA
27. Oasis Centre des femmes