

Human Rights-Based Approach to Housing Team
Canada Mortgage and Housing Corporation
700 Montreal Rd
Ottawa ON K1A 0P7
By email only to: placetocallhome@cmhc-schl.gc.ca



June 8, 2018

Dear Minister Duclos, Mr. Vaughan, and the Human Rights-Based Approach to Housing Team,

Campaign 2000: End Child and Family Poverty in Canada appreciates the opportunity to respond to the National Housing Strategy Discussion Paper, *A Human Rights-Based Approach to Housing*. We recognize and are grateful for the long-time advocacy of the housing and anti-poverty movements which have laid the groundwork for this opportunity to shape housing policy and reduce poverty in Canada.

Campaign 2000 is a non-partisan, cross-Canada public education movement to build Canadian awareness and support for the 1989 all-party House of Commons resolution to end child poverty in Canada by the year 2000. Our coalition formed in 1991 out of concern about the lack of federal government progress in addressing child poverty and is now comprised of 120 partner organizations from coast to coast to coast.

We believe that the federal government has a responsibility to honour the 1989 all-party resolution to end child poverty and subsequent resolutions passed in 2009 and 2015. Our research, monitoring and advocacy has contributed to improving income support for low and modest income families and the development of poverty reduction strategies in all provinces and territories.

Despite some progress, child poverty remains at shameful levels in Canada. Today, over 1.2 million children live in poverty with their families (Low Income Measure, After Tax). Troublingly, children in families who are Indigenous, racialized, immigrant, lone mother-led or affected disabilities live in poverty in disproportionate numbers. It is unconscionable that nearly 40% of First Nations children and 30% of racialized and immigrant children in Canada live in poverty.¹

Campaign 2000 welcomes the federal government's stated commitment to reduce child poverty. This goal has been connected to the introduction of the Canada Child Benefit (CCB). Our coalition recognizes the great significance of the CCB to families and to the Canadian economy, as described in the 2017 Fall Economic Statement.² We also note that the CCB alone cannot combat child poverty. Adequate investment in services and programs such as housing, early learning and childcare, equitable child welfare services for First Nations families and affordable post-secondary education and training along with the provision of quality, sustaining employment options, are fundamental to eradicating child and family poverty in Canada.



Campaign 2000, c/o Family Service Toronto
Phone: 416-595-9230, ext. 244/250

www.campaign2000.ca & www.familyserVICEToronto.org

Ensuring integration and alignment of the National Housing Strategy (NHS) with the upcoming Canadian Poverty Reduction Strategy is essential to meet government's goal to reduce child and family poverty. Campaign 2000 has called on the federal government to adopt a poverty reduction lens on all policy decisions to ensure that people most in need benefit from programs meant to improve quality of life and restore dignity. A structural response to poverty and inequality will help stop individualizing poverty, homelessness and housing instability so that victims of systemic failures are no longer blamed for their situation.

Campaign 2000 views the level of federal leadership, investment and the targets and timelines adopted to guide the elimination of homelessness and development of affordable housing as indicators of the strength of the federal government's commitment to reducing poverty and upholding human rights in Canada. We encourage concrete and substantive action when it comes to a rights-based approach to housing in Canada.

The federal government can demonstrate its commitment immediately by recognizing its obligation to take all necessary measures to end homelessness by 2030. The current goal of reducing homelessness by 50% by 2030 is widely seen as insufficient and it is inconsistent with Canada's commitment to fulfill the United Nations' Sustainable Development Goals.³

Campaign 2000 recommends strong mechanisms for the progressive realization of the Right to Housing in Canada. We endorse the ten principles of a rights-based housing strategy outlined by United Nations' Special Rapporteur on the Right to Adequate Housing, Leilani Farha, in her March 2018 report to the UN Human Rights Council.⁴ In addition, we wish to emphasize select points to respond to the NHS discussion paper.

To ensure Canada's National Housing Strategy is truly rights-based, strong legislation must include recognition of Canada's international obligations to uphold the right to adequate housing. The legislation must be subject to transparent and independent monitoring of the government's progress towards meeting targets and timelines. A commitment to "address systemic inequality on the basis of race, gender, disability, and other grounds, the impacts of colonization, and the rights of Indigenous communities, including those in urban centres"⁵ is essential.

Participants in the Ottawa- based roundtables on the Right to Housing attended by Campaign 2000 repeatedly emphasized the need for the legislation to 'have teeth.' In part, this means the legislation must outline provisions so that systemic issues are subject to public hearings, adjudication and remedies by rights claimants. The legislation and the adoption of a rights-based approach to housing has to make a positive difference in the lives of people affected.

We assert that a strictly symbolic legal statement of rights is harmful. Such a statement will rightfully lead to cynicism if the legislation does not establish mechanisms for adjudication and enforcement. In addition, such mechanisms must be accessible, including the provision of resources for aggrieved parties to receive adequate representation.

The adoption of a human rights framework must follow the principle of 'nothing about us without us.' This means the NHS must integrate ongoing involvement, leadership and decision-making

power among people with lived experience of homelessness and housing precarity. These individuals must have central roles in monitoring, evaluation and oversight, including within the national housing advisory council and the community-based tenant initiative. The representation of marginalized communities in these functions is essential. People who are Indigenous, racialized and/or live with disabilities; women and girls fleeing violence; immigrants and refugees; seniors; people requiring support with addictions and mental health, and; LGBTQ2S+ youth and trans people, among others, must be involved as stakeholders.

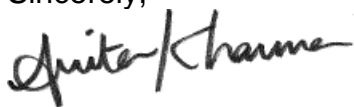
Collaboration across all levels of government – First Nations, provincial, territorial and municipal - is also essential to the successful implementation of a rights-based approach to housing. We echo Bruce Porter and Emily Paradis' call for a whole-of-government approach, "where all implicated ministries and all levels of government recognize their obligations with respect to the right to housing."⁶ Federal leadership is essential in this context.

Campaign 2000 calls for strong federal leadership that is collaborative, equitable, flexible and insistent on clear goals and accountability for results in the areas of poverty reduction and housing. In the context of the NHS, we urge the federal government to adopt pan-Canadian standards and conditions on housing funding transfers to provinces and territories. These conditions should outline the expectation that all levels of government uphold the right to adequate housing.

A central element of the realization of the right to adequate housing involves ensuring sufficient funds, accountable budgeting and tax justice, as outlined by Farha.⁷ She states that "strategies will not be successful if governments fail to allocate reasonable budgets and resources for their implementation. Housing strategies must include both short- and long-term commitments of adequate resources." We also wish to underscore her point that human rights-based housing strategies must commit to carrying out needed tax reforms to ensure that taxation promotes the fulfilment of the right to housing rather than undermining it.

Our network thanks CMHC for the opportunity to provide input into the National Housing Strategy's Rights-Based Approach to Housing. A safe, secure and stable home is a central building block for children's healthy development and success at home, in school and in future employment. Housing is essential to eradicating child and family poverty in Canada. We look forward to the What we Heard report which will follow from this consultation period and to the release of strong, effective legislation affirming the right of every Canadian to adequate housing.

Sincerely,



Anita Khanna
National Coordinator, Campaign 2000
Director, Social Action and Community Building
Family Service Toronto

CC: Campaign 2000 National Steering Committee

- Adrienne Montani, First Call: BC Child and Youth Advocacy Coalition (BC)
- Joel French, Public Interest Alberta (AB)
- John Kolkman and Sandra Ngo, Edmonton Social Planning Council (AB)
- Arlene Hache, Centre for Northern Families, Northwest Territories (NT)
- Miguel Sanchez, Social Policy Research Unit, University of Regina (SK)
- Cody Sharpe, Upstream, Saskatchewan (SK)
- Kate Kehler, Social Planning Council of Winnipeg (MB)
- Sid Frankel, University of Manitoba (MB)
- Margaret Hancock, Family Service Toronto (ON)
- Laurel Rothman, Ontario Coalition for Better Child Care (ON)
- Anita Khanna, National Campaign 2000 (national)
- (Vacant), Ontario Campaign 2000 (ON)
- Martha Friendly, Childcare Resource and Research Unit (national)
- Leilani Farha, Harriett McLachlan and Liz Majic, Canada Without Poverty (national)
- Joe Gunn and Natalie Appleyard, Citizens for Public Justice (national)
- Lesley Frank, Acadia University, Nova Scotia (NS)
- Stella Lord, Community Society to End Poverty (NS)
- Christine Saulnier, CCPA Nova Scotia (NS)
- Randy Hatfield, Human Development Council, New Brunswick (NB)
- Mary Boyd, MacKillop Centre for Social Justice and PEI Poverty Reduction Committee (PEI)
- Penelope Rowe, Community Sector Council, Newfoundland and Labrador (NL)

¹<https://campaign2000.ca/wp-content/uploads/2017/11/EnglishNationalC2000ReportNov212017.pdf>

²<https://www.budget.gc.ca/fes-eea/2017/home-accueil-en.html>

³ <http://www.socialrights.ca/2018/2ps.pdf> and <http://caeh.ca/wp-content/uploads/CAEH-Right-to-Housing-Discussion-Paper-FINAL.pdf>

⁴ <https://documents-dds-ny.un.org/doc/UNDOC/GEN/G18/007/65/PDF/G1800765.pdf?OpenElement>

⁵ <http://www.socialrights.ca/2018/2ps.pdf>

⁶ Ibid.

⁷ <https://documents-dds-ny.un.org/doc/UNDOC/GEN/G18/007/65/PDF/G1800765.pdf?OpenElement>