



Manitoba Non-Profit Housing Association
PO Box 70003 RPO Kenaston
Winnipeg, Manitoba R3P 0X6
204-797-6746
execdir@MNPHA.com
www.MNPHA.com

Human Rights-Based Approach to Housing Team

Canada Mortgage and Housing Corporation
700 Montreal Rd
Ottawa ON K1A 0P7

June 1, 2018

The Manitoba Non-Profit Housing Association (MNPHA) is pleased to participate in the consultation on a Human Rights-Based Approach to Housing as part of the National Housing Strategy. MNPHA represents over 100 non-profit housing providers across Manitoba who provide over 23,000 units of affordable housing for families, seniors, and people with special needs. MNPHA believes that safe, secure housing is a basic human right and we understand that access to housing is a determinant of health, for both individuals and communities.

A human-rights based approach to housing embedded within the national housing strategy and Federal legislation is strongly supported by our Association and its members, as we believe it will promote sustainability in federal government leadership in the provision and maintenance of social and affordable housing. This submission will focus on MNPHA's recommendations related to the principles of the rights-based approach to housing and the mechanisms proposed in the National Housing Strategy to achieve these principles. The core principles of accountability, participation, non-discrimination, and inclusion described in the Discussion Paper: *A Human Rights-Based Approach to Housing*, if they permeate all decision-making related to housing, will move Canada progressively towards its international obligations. The extent to which the core principles actually promote a human rights-based approach to housing will depend greatly on the implementation details and the political will to maintain this approach over time.

Accountability

Accountability requires measuring the progress towards achieving the targets set-forth by Parliament through the National Housing Strategy. This is described as a "focus on improving specific, enumerate, and measureable housing outcomes for those in greatest need." What matters in implementation tends to be the things we can count; however, across Canada we do not have consistent agreement on what we are counting and why. Indicators must consider the immense diversity of housing across the country, taking into account the housing needs and markets in rural and remote areas, northern communities, and Metis and First Nations' lands. It is essential to get this right from the beginning as it will guide decision-making over the next 10-years and possibly beyond. Consistent and high quality data will be most useful for decision-making, and at the same time, housing providers already have high administrative burdens and rarely have the resources to increase their reporting to funders or governments. The more detailed and comprehensive the reporting requirements become, the less likely they are to be consistently measured and reported.

MNPHA recommends that measurement targets and indicators be standardized across Canada, with input from the non-profit housing sector, and a simple, non-burdensome collection/reporting process for providers.



Manitoba Non-Profit Housing Association
PO Box 70003 RPO Kenaston
Winnipeg, Manitoba R3P 0X6
204-797-6746
execdir@MNPHA.com
www.MNPHA.com

Additionally, under the current funding initiatives of the National Housing Strategy, it is unclear how a focus on achieving measurable housing outcomes for those in greatest need is prioritized over other objectives that may be easier to measure. Providing good housing to those in the highest need, while it has a greater economic benefit overall, usually comes with a greater financial cost for providers. Unique design features, high quality property management, development in safe and vibrant communities, and requisite health and social supports for tenants who will need deep rent subsidies, cannot come at the expense of reaching overall numerical targets each year. We also know that for many tenants, periods of greatest need are temporary while families and individuals go through short-term crises, transitions, or challenging periods of their lives. Housing programs must provide flexible but sustained support at varying levels to promote inclusive and stable communities.

MNPHA recommends that all funding and other programs flowing from the National Housing Strategy have criteria and decision-making processes that define and prioritize the achievement of housing outcomes for those in greatest needs. MNPHA also recommends there be recognition of the need for diverse, flexible, and sustained support for affordable housing to generate positive outcomes for communities and neighbourhoods.

Participation

The Federal Housing Advocate position is described in the Discussion Paper as a mechanism to “recommend to Canada Mortgage and Housing Corporation and the responsible Minister, solutions to systemic barriers that Canadians face in accessing affordable housing.” The Advocate position, if independent and empowered to publically report to Cabinet, is an important apparatus as those facing barriers to housing also likely face barriers to participation in existing legislative and other systemic processes. It will be critical for the Advocate to be accessible to groups across Canada, as housing needs and challenges vary greatly across regions and provinces. For example, while Manitoba has lower proportions of households spending more than 30% or 50% of their incomes on rent when compared with the rest of Canada, it has higher rates of overcrowding.¹ In Manitoba, Indigenous people are grossly over-represented amongst those in housing need, and account for over 70% of the population experiencing homelessness.² While groups experiencing housing need, including seniors, people with disabilities, newcomers, and Indigenous peoples, are similar across Canada, there are important differences across provinces as to how these housing needs are manifested and could be addressed.

MNPHA recommends that the Federal Housing Advocate position have the resources and responsibility to gather feedback and report on housing issues across all of Canada, recognizing that Manitoba has unique housing challenges and a unique population.

Inclusion

While the Advocate has an essential role in bringing systemic issues to government to resolve, participation of those most impacted by housing issues would likely be limited without the additional initiatives in the National Housing Strategy: The new National Housing Council and Community-based

¹ Canadian Rental Housing Index, 2018. Retrieve from http://www.rentalhousingindex.ca/en/#comp_prov

² Winnipeg Street Census, 2015. Retrieved from <http://streetcensuswpg.ca/2015-census/>



Manitoba Non-Profit Housing Association
PO Box 70003 RPO Kenaston
Winnipeg, Manitoba R3P 0X6
204-797-6746
execdir@MNPHA.com
www.MNPHA.com

Tenant Initiative. As discussed above, it is important to MNPHA that there be representation from Manitoba on the Housing Council to bring Manitoba's housing issues to the table for discussion. That/those Council member(s) must also see their role as hearing from Manitobans and representing their issues at the table, rather than sitting on the Council as an individual expert. There should be clear and known mechanisms for the Council to hear about systemic violations of the right to housing, and a clear process for these violations to be brought to Cabinet and resolved.

MNPHA recommends that the new National Housing Council include, at a minimum, representation from each province.

Inclusive processes need to include outreach to those impacted by housing need, and support education and capacity building so people can engage meaningfully in the policy and funding decisions that impact them. MNPHA's members have a distinctive ability to conduct this outreach and many already have innovative programs to promote tenant engagement that could further the principle of inclusion within the National Housing Strategy.

MNPHA recommends that the Community-Based Tenant Initiative Fund include resources directed to non-profit housing organizations, and their tenants, to be used to remove barriers to participation in decision-making and policy setting opportunities.

Non-Discrimination

Communities, economies, and our society thrives when the non-profit housing sector is supported and sustainable. Despite outdated stigma attached to affordable housing, the sector has always been advanced, professional, and incredibly skilled at providing good housing to those excluded from private-sector housing. Where public concern or complaint arises from affordable housing, it is too often because housing providers have not had the resources to provide the community and social supports, and economic opportunities, necessary to address the challenges tenants are facing. Rather than a progressive response of providing more affordable housing throughout all neighbourhoods, the solution to concentrated poverty has regularly been to 'diversify the housing stock' – that is, to reduce the number of low-income families and individuals living in the housing. But this does not solve the issue at hand. Winnipeg's Lord Selkirk Park revitalization project is an award-winning example of enhancements to the vibrancy of a community through increasing and coordinating resources for those living in it. The national public engagement campaign to inform public views about different types and tenures of affordable housing is an exciting and exceptional opportunity to promote examples like this in our sector and the amazing things we have accomplished for Canadians.

MNPHA recommends that the public education campaign to reduce the stigmatization of affordable and social housing include real examples where increased investment to develop/renew/provide tenant supports in affordable, non-profit housing improved the vibrancy of a community.

The legislation creating a human rights-based approach to housing is a defining moment for Canada's housing sector. MNPHA members look forward to continuing to work with governments, funders, and the private sector, playing a vital role in guaranteeing all Canadians can access their right to good, safe, affordable housing.