WomanACT
WOMAN ABUSE COUNCIL OF TORONTO

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July 5, 2022

ATTN: Planning and Housing Committee

RE: PH35.19 – Implementation of Income and Asset Limits to Determine Eligibility for Rent-Geared-to-Income Assistance

Dear Chair and Committee Members:

WomanACT is a policy and planning body that works collaboratively to end violence against women through community mobilization, coordination, research, policy, and education. We have been doing this work for over 30 years.

We are writing to today to ensure that income and asset rules for rent-geared-to-income (RGI) housing do not cause additional barriers for women fleeing violence. In line with O. Reg. 242/22, we are requesting the Housing Secretariat to develop guidance under the extenuating circumstances rule that outlines how to fairly apply income and asset limits to Special Priority Policy (SPP) applicants.

Housing stability and violence against women are deeply connected. A lack of access to safe and affordable housing can prevent women from leaving an abusive relationship, while women often face housing instability and homelessness when fleeing violence. Ensuring that survivors have access to a range of affordable housing options, including RGI units, is critical to meeting the diverse needs of women experiencing violence.

SPP applicants face two main challenges when subject to income and asset limits for RGI housing: access to documents and access to reported income and assets.

Access to documents. Survivors may have limited access to documents that report their income and assets. When fleeing a violent situation quickly and with safety as the priority, gathering personal documents is not always possible. Additionally, survivors may not be able to return to their previous home or request documents for fear of their safety – an issue acknowledged in the existing RGI rule that exempts SPP applicants from obtaining documents that place them at risk of harm. Experiences of financial abuse may also prevent survivors from accessing financial information.

Access to reported income and assets. In cases where survivors can safely provide documentation of income and assets, reported amounts may not accurately reflect the applicant's financial situation and needs. Survivors of financial abuse may be earning income or have their name attached to assets that they do not have access to or control over. Survivors across income levels have reported experiences of abuse that include

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partners taking their money, pay checks, or government benefits, as well as withholding banking information. These experiences can continue even after separation.

We hope that these considerations will be carried forward in the implementation of the City's RGI income and asset limits. Extenuating circumstances guidance should maintain Service Manager discretion and flexibility for SPP applicants. We welcome the opportunity to be involved in the implementation plan development to ensure it applies an intersectional gender lens and supports survivors' access to safe and affordable housing.

Sincerely,

Harmy Mendoza
Executive Director, WomanACT