

*Written Submission to the Review Panel on the Financialization of
Purpose-Built Rental Housing by the National Right to Housing
Network and Women's National Housing and Homelessness Network*

GENDERED EVICTIONS IN FINANCIALIZED HOUSING MARKETS ACROSS CANADA:

**The Case for Human Rights
Intervention and Oversight**



THE NATIONAL
RIGHT TO HOUSING
NETWORK



WOMEN'S NATIONAL
HOUSING & HOMELESSNESS
NETWORK

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Introduction

Canada is currently facing a severe housing crisis, with skyrocketing rents and a market that prioritizes profit over the dignity, needs, and legal human rights of renters. This crisis particularly affects women, girls, and gender-diverse individuals who often live in insecure and unsafe housing due to poverty and economic marginalization, inequitable and exclusionary government policies, and discriminatory practices in the housing sector.¹

The housing crisis in Canada, particularly for women and gender-diverse individuals, is a two-fold challenge underpinned by the increased financialization of housing and deepening poverty for those on low incomes or social assistance. Financialization is “marked by the increasing penetration of financial practices, logics, and strategies into non-financial sectors.”² In effect, **the financialization of housing positions governments as primarily accountable to investors rather than rights-holders, including marginalized women and gender-diverse persons.** In this context, we are increasingly seeing evictions in our communities. Evictions faced by women, girls, and gender-diverse people represent one node of a much larger ecosystem – one characterized by extensive and systems-wide policy failure that enacts extreme harm for women and gender-diverse people – in settings both specific and large-scale.

While the home can unquestionably be a site of extreme violence for many women and gender-diverse people, the loss of housing can remove an important buffer from other forms of harm, exploitation, and marginalization, making these evictions doubly harmful for the communities we serve.

Evidence submitted to this Panel by our partners demonstrates that financialization of housing exacerbates and expedites evictions, in many cases. [The Shift Directives – From Financialized to Human Rights-Based Housing](#) presents an apt analysis on this impact, noting: “Governments often compromise tenant protections to facilitate profit-making for owners of residential real estate, including by enacting legislation that allows rents to be raised without limits or with tenant turnover, and permitting the exploitation of legal provisions like no-cause or expedited eviction proceedings as a means of increasing rents.”³ This is well-documented across Canada. For example, the Advocacy Centre for Tenants Ontario (ACTO) recently released a report citing a major rise in no-fault eviction applications in Toronto, with an 84% increase in private landlords filing for ‘own use’ claims and a 294% increase in ‘renovictions’ since 2016.⁴

This interconnection of financialization and eviction is further explored in research published by the Office of the Federal Housing Advocate. Summarizing the negative impacts that profits-focused business strategies can have on tenants living in multi-family buildings, expert Marine August writes:

Revenue generation strategies that enrich investors do so by extracting more from tenants. This increases economic hardship. Tenants are negatively affected by increased ancillary costs, rent increases, and above guideline increases...[t]enants are economically displaced if they cannot

¹ Schwan, K., Versteegh, A., Perri, M., Caplan, R., Baig, K., Dej, E., Jenkinson, J., Brais, H., Eiboff, F., & Pahlevan Chaleshtari, T. (2020). *The State of Women’s Housing Need & Homelessness in Canada: Literature Review*. Hache, A., Nelson, A., Kratochvil, E., & Malenfant, J. (Eds). Toronto: Canadian Observatory on Homelessness Press. <http://womenshomelessness.ca/wp-content/uploads/State-of-Womens-Homelessness-Literature-Review.pdf>

² Farha, L., Freeman, S., Gabarre de Sus, M., Perucca, J., & McMurty, A. (2022). *The Shift Directives – From Financialized to Human Rights-Based Housing*. Ottawa, ON: The Shift. <https://make-the-shift.org/wp-content/uploads/2022/05/The-Directives-Formatted-DRAFT4.pdf>

³ Farha et al., 2022.

⁴ Advocacy Centre for Tenants Ontario. (2019). *We Can’t Wait: Preserving Our Affordable Rental Housing in Ontario*. https://www.acto.ca/production/wp-content/uploads/2019/11/FINAL_Report_WeCantWait_Nov2019.pdf

*afford increases in charges... [t]hey may be displaced by direct pressure from the landlord, via threats of eviction or actual eviction notices.*⁵

Furthermore, given its emphasis on deregulation and profit-generation, financialization leads to a concentration of wealth and power that reinforces gender, socio-economic, and race-based inequities.⁶ Increased house prices and rental costs that result from financialization (for example through above the guideline rent increases that are well beyond what is needed for repairs or adjustments for inflation) have a gendered effect because of women's disadvantaged position in the workforce, their lower wages, and the greater care burdens they face.⁷ The financialization of housing thus leaves marginalized women and gender-diverse persons in a uniquely vulnerable position because of economic inequities they face – inequities deepened in financialized housing markets.

Evictions, and their long-term consequences, are disproportionately felt by Indigenous women, girls, and 2SLGBTQIA+ peoples. The [Homeless on Homelands](#) Claim further establishes the financialization and commodification of housing as central to the ongoing colonial project:

“Colonial conceptualizations of land, ownership and housing as commodities that are bought, sold and are subject to financial speculation disrupt the relationship of mutuality and reciprocity. It commodifies land and positions housing development as a tool of extracting wealth and profits. The current increased financialization of housing that we are experiencing in Canada deeply relies on disruption and elimination of Indigenous ways of knowing and living. Thus, any exercise of Indigenous housing rights in Canada must be informed by attempts of colonial governments to eliminate Indigenous ways of living and knowing.”⁸

Importantly, as you well know, the Government of Canada made a historic and legislated commitment to progressively realize the human right to adequate housing via the *National Housing Strategy Act* of 2019. This legislation explicitly references international human rights law and standards to establish a new paradigm in Canada's housing sector – one in which the dignity and housing needs of tenants and marginalized communities must be at the centre of all housing policies, budgetary decisions, laws, and programs that affect them. In effect, this makes every level of government (under the leadership of the federal government) primarily accountable to residents and tenants most in need of adequate housing and security of tenure, including marginalized women and gender-diverse people.

This submission, prepared by a team of researchers and advocates from the [Women's National Housing and Homelessness Network](#) and the [National Right to Housing Network](#), articulates critical systemic issues at the intersection of financialization and evictions in the lives of women and gender-diverse people, alongside human rights-based analyses and recommendations that can begin to address these human rights concerns. In the context of financialization, we asked: what does it mean to face an eviction in the context of financialization? And in particular: **what does it mean for women, girls, and gender-diverse people to face an eviction – an experience compounded by the feminization of poverty and gender-based exclusion from labour markets, as well as other kinds of marginalization and discrimination?** This

⁵ August, M. (2022) The Financialization of Multi-Family Rental Housing in Canada: A report for the Office of the Federal Housing Advocate. <https://www.homelesshub.ca/sites/default/files/attachments/august-financialization-rental-housing-ofha-en.pdf>

⁶ *Ibid.*

⁷ Schwan, K., Vaccaro, M., Reid, L., & Ali, N. (2021). *Implementation of the Right to Housing for Women, Girls, and Gender Diverse People*. Prepared for the Canadian Human Rights Commission of Canada. Toronto, ON: Women's National housing & Homelessness Network. https://womenshomelessness.ca/wp-content/uploads/EN_CHRC_13-1.pdf

⁸ National Indigenous Feminist Housing Working Group. (2021). *Homeless on Homelands: Upholding Housing as a Human Right for Indigenous Women, Girls, Two-Spirit and Gender-Diverse People*. p. 10. <https://womenshomelessness.ca/wp-content/uploads/Indigenous-Housing-Claim-June-15-2022.pdf>.

Submission to Canada’s first ever Review Panel on a systemic violation of the right to housing explores our findings from this research, drawing on data from our primary research, an extensive literature review of over 80 articles, case law review, and testimony shared by our lived expert peers and colleagues.

Human Rights Standards and the National Housing Strategy Act

The commitment to the right to housing as affirmed in the *National Housing Strategy Act* includes the obligation to take all necessary measures to address structural and systemic inequalities that deny women, girls, and gender-diverse persons the full enjoyment of their right to housing. Both international and national law guarantee substantive equality, including in the area of housing, requiring governments to prevent both formal discrimination and substantive discrimination. This means that governments must not only remove policies and practices that are explicitly discriminatory, but they must also ensure *the equal enjoyment of rights* for women, girls, and gender-diverse people.

Some aspects of the right to housing are subject to “**progressive realization**,” requiring governments to use “**all appropriate means**” and the “**maximum available resources**” to realize the right to housing “**in the shortest possible time**.”⁹

The obligation to ensure that all policies and programs are consistent with both formal and substantive equality is an “immediate” obligation. This is particularly compounded by the dire consequences that rights holders face when a denial of rights which could result in threats to life, safety, or health. While some of the systemic issues identified in this Submission may require some time to adequately address, others identify existing policies that discriminate by denying substantive equality within the Canadian housing system, including as a result of financialization.

Issue 1: Evictions and Gender-Based Violence

The financialization of housing across Canada exacerbates the conditions under which Intimate Partner Violence (IPV) occurs, resulting in eviction, housing precarity, increased exposure to violence, and cycles of marginalization for women and gender-diverse people.

Women and gender-diverse people who flee violence experience substantial financial losses, including property, savings, and access to affordable services, supports, and transportation.¹⁰ These financial losses make it significantly more difficult to afford housing post-abuse, particularly in financialized housing markets. In a [2023 report](#) on market rental housing experiences of survivors of gender-based violence, respondents reported that, for up to 5 years after leaving an abusive relationship, they had trouble affording or paying their housing costs.¹¹

For many women and gender-diverse people experiencing violence, the financialization of housing in fact limits their ability to escape abuse and find safety on their own terms because it removes affordable

⁹ A/HRC/31/54, para. 4.

¹⁰ Schwan et al., 2020.

¹¹ WomanACT. (2023). *Successful Tenancies: Exploring Survivors Experiences in the Private Rental Market in Toronto*. Toronto, ON: WomanACT. p. 5. <https://womanact.ca/wp-content/uploads/2023/03/WomanACT-Successful-Tenancies-Report.pdf>

housing from the market (as demonstrated by partner submissions). Research demonstrates that women will often remain in abusive situations for years because they cannot afford any other housing in their community, or available housing does not meet their children's needs (e.g., proximity to transportation, schools), and/or they fear for their children's safety in the care of their partner. Mothers who do leave situations of IPV with their children often experience housing need and profound systemic challenges in accessing supports and regaining housing stability in increasingly financialized markets where adequate sized housing units are simply out of reach for single-income earners like single mothers.

Studies also show that when it comes to evictions, the law, legal processes, and housing policies are stacked against victims of violence and are often implicated in what can “quickly become a downward slide into homelessness.”¹² Laws surrounding evictions often fail to protect women from violence and can instead perpetuate housing insecurity, particularly Indigenous and intersectionally marginalized women. **A 2022 study found that landlords may evict survivors of intimate partner violence due to perceived or actual damage caused by abusers or to avoid dealing with disruptions, leading to further vulnerability.**¹³¹⁴

Even a simple noise complaint can lead to a landlord-forced eviction for both the victim and the abuser for “for breaching the covenant that prohibits interfering with the rights of other tenants.”¹⁵ Landlord bias and zero-tolerance ordinances are widely quoted in research as being rationales for evictions served to women experiencing violence. A recent study, [Pandemic precarity and everyday disparity: gendered housing needs in North America](#), notes: **“Due to zero-tolerance and other nuisance ordinances, along with landlord bias, many landlords will evict domestic violence survivors because of the perceived or real damage their abusers inflict in the apartments they rent or because they do not want to contend with disturbances.”**¹⁶ This is particularly concerning given the primary responsibility of financialized housing actors to generate profit for shareholders.

Even when a woman has not taken any action for herself or caused any “disruption” in her unit, just her experiencing violence can be grounds for eviction. In their [recent research](#), Buhler and Tang (2019) document many such narratives that paint a stark picture of women's experiences of violence and eviction.¹⁷ One participant details the reason she was threatened for eviction by her landlord was because other people in the building were afraid when they would hear her being beaten or stabbed. Her landlord also pursued her for unpaid rent, even though her partner would tell her that he had paid rent. In another instance, a participant detailed that she and her partner were evicted for “fighting.”¹⁸ Importantly, research also shows that various efforts women take to protect themselves from violence can actually become the grounds for their own eviction. In one study, a woman's attempt to protect herself and change her locks after dealing with a break-in became grounds for her landlord applying for an eviction.¹⁹ Such instances are examples of how particular policies and practices by landlords force women to choose between their safety and risking eviction.

Importantly, women and gender-diverse people's housing is often dependent upon relational and familial

¹² Gander & Johannson, 2014. p. 6.

¹³ Parker, B., & Leviten-Reid, C. (2022). Pandemic precarity and everyday disparity: gendered housing needs in North America. *Housing and Society*, 49(1), p.22

¹⁴ Buhler, S., & Tang, R. (2020). Navigating power and claiming justice: tenant experiences at Saskatchewan's housing law tribunal. *Windsor Yearbook of Access to Justice*, 36, 210-230.

¹⁵ Gander & Johannson, 2014. p.6.

¹⁶ Parker, B., & Leviten-Reid, C. (2022). Pandemic precarity and everyday disparity: gendered housing needs in North America. *Housing and Society*, 49(1), p.22

¹⁷ Buhler, S., & Tang, R. (2020). Navigating power and claiming justice: tenant experiences at Saskatchewan's housing law tribunal. *Windsor Yearbook of Access to Justice*, 36, 210-230.

¹⁸ *Ibid.*

¹⁹ *Ibid.*

ties, putting their security of tenure in jeopardy in financialized housing markets.^{20 21}

The right to security of tenure and protection from forced evictions has a particular meaning for women and gender-diverse people as per the UN [Guidelines on the Implementation of the Right to Housing](#), which state that, “the independent right of women to security of tenure, irrespective of their family or relationship status, should be recognized in national housing laws, policies and programs.”²² Under international human rights law, women must be provided with protection from eviction from their homes due to violence, while “long-term housing programmes, including those for the allocation of permanent public or social housing, should prioritize women and families escaping violence.”²³ Similarly, any application to evict women or women with children must be assessed in the context of its impact, including their experience of violence, disability, and health concerns, and their income status, and whether it places women at risk of homelessness.²⁴ The UN Committee on Economic, Social, and Cultural Rights has established **that evictions should only be carried out as “as a last resort,” and “evictions should not render individuals homeless.”**²⁵ The Committee on the Rights of the Child further emphasized this in their [2022 review of Canada](#).

Issue 2: Gender-Based Economic Marginalization

Feminization of poverty makes recovery from eviction uniquely difficult for marginalized women and gender-diverse people in financialized housing markets that reduce affordable housing options. As a result, post-eviction consequences are particularly severe for this group, and can include homelessness, chronic housing precarity, health challenges, separation from children, and gender-based violence.

The feminization of poverty has been well-documented in Canada,²⁶ with data indicating women often survive on lower incomes, are overrepresented in minimum-wage and part-time jobs,²⁷ assume disproportionate responsibilities for housework and childcare,²⁸ and their employment and income is more likely to be interrupted in the event of pregnancy and/or child rearing.²⁹ Income inequality is particularly evident for Indigenous and racialized women, with research indicating that racialized women in Canada earn only 55.6% of the income earned by non-racialized men.³⁰ Many people facing eviction are vulnerable and high-need, so they require affordable housing - but this is the very housing that is often targeted for

²⁰ The [Pan-Canadian Women’s Housing & Homelessness Survey](#) indicates that amongst women and gender-diverse persons experiencing homelessness, their most recent housing loss was because of a breakup (47% reported this experience).

²¹ Schwan et al., 2021.

²² A/HRC/43/43 [Guidelines on the Implementation of the Right to Housing], para 53.

²³ *Ibid*, para 53(c).

²⁴ CESCR. *Views adopted by the Committee under the Optional Protocol to the International Covenant on Economic, Social and Cultural Rights, concerning communication No. 52/2018*, Rosario Gomez-Limon Pardo (E/C.12/67/D/52/2018 paras 9.5-9.7.

²⁵ CESCR, *Ben Djazia et al v Spain* (20 Jun 2017) E/C.12/61/D/5/2015, para 15.1-15.2.

²⁶ Fotheringham, Walsh, & Burrowes, 2014.

²⁷ Canadian Women’s Foundation. (2018). *Fact Sheet: Women and Poverty in Canada*. <https://canadianwomen.org/the-facts/womens-poverty/>. See also Moyser, M. & Burlock, A. (2018). *Time use: total work burden, unpaid work, and leisure*. Statistics Canada. <https://www150.statcan.gc.ca/n1/pub/89-503-x/2015001/article/54931-eng.htm>

²⁸ Burt, M. R. (2001). Homeless families, singles, and others: Findings from the 1996 national survey of homeless assistance providers and clients. *Housing Policy Debate*, 12(4), 737-780. See also Fotheringham et al., 2014, p. 834-853.

²⁹ Vecchio, 2019.

³⁰ Block, S., Galabuzi, G. E., & Tranjan, R. (2019). *Canada’s Colour Coded Income Inequality (Report No. 978-1-77125-478-6)*. Canadian Centre for Policy Alternatives. <https://policyalternatives.ca/publications/reports/canadas-colour-coded-income-inequality>

redevelopment in financialized housing markets, which increases their vulnerability to eviction and reduces their ability to compete in the housing market once evicted.³¹

Exposure to evictions and their consequences are even more severe for multi-marginalized women and gender-diverse people, particularly for women and gender-diverse people with disabilities.³² This is especially vivid for women and gender-diverse people with disabilities, with evidence from [The Pan-Canadian Survey](#) indicating a heightened risk of eviction for this group, alongside increased housing affordability problems. The Survey indicated that difficulties with finding a place because of affordability issues was significantly higher for women and gender-diverse people with mental health disabilities (73.0% vs. 40.3%), substance use problems (77.0% vs. 49.8%), cognitive/intellectual disabilities (77.7% vs. 55.2%), and physical disabilities (65.0% vs. 53.0%) compared to those who are homeless but not disabled.

It is important to note evictions are occurring in a national context wherein federal investments in housing through the [National Housing Strategy](#) are often not reaching the most marginalized and vulnerable women and gender-diverse people and reproducing financialization logics in the housing market. For example, a recent report commissioned by the National Housing Council concluded, “very few (4%) of new units produced by the Rental Construction Financing Initiative could lift lone-parent families out of CHN [core housing need], a group that is disproportionately in need of affordable housing.”³³ The same report indicated that the RCFI – which represents 40% of NHS funding – will likely produce no units for single moms who are homeless with their children.³⁴ In effect, the NHS is largely failing to mitigate the reduction of deeply affordable housing caused by financialization, and low-income women, gender-diverse people, and their children are paying the price.

Financialization of housing has changed the landscape of evictions across Canada over the last 15 years, “with a marked rise in development-related evictions in the context of tight housing markets and a lack of affordable housing.”³⁵ Unfortunately, current eviction prevention programs are generally not designed for this new landscape; measures currently correspond to evictions driven by tenant factors, not by landlord or structural factors. This submission emphasizes the significance of the National Housing Strategy’s failure to provide deeply affordable housing that meets the unique needs of low-income and marginalized women and gender-diverse people in financialized housing markets – markets which are escalating particular forms of eviction that these groups are vulnerable to.

The Government of Canada’s failure to provide a sufficient stock of adequate, affordable housing that is financially accessible to low-income households led by women and gender-diverse persons violates this obligation, as well as a number of other obligations under international human rights law. This includes obligations under **article 11 of the ICESCR** to ensure an adequate standard of living (including adequate housing), and **under article 10** to accord the widest possible protection and assistance to the family, particularly for its establishment and while it is responsible for the care and education of dependent children. It is also contrary to the obligation under the **Convention on the Rights of the Child (article 27)**, which requires states to assist parents and others responsible for the child to implement the right to a standard of living adequate for the child's physical, mental, spiritual, moral, and social development, and in

³¹ Zell, S., & McCullough, S. (May 2020). *Housing Research Report: Evictions and Eviction Prevention in Canada*. Ottawa, ON: Canada Mortgage and Housing Corporation.

https://eppdscrmssa01.blob.core.windows.net/cmhcprodcontainer/sf/project/archive/research_6/evictions-and-eviction-prevention-in-canada.pdf

³² Schwan et al., 2022.

³³ Blueprint ADE & the Wellesley Institute, 2022.

³⁴ *Ibid.*

³⁵ Zell & McCullough, 2020. p. iii.

case of need, to provide material assistance and support programmes, particularly with regard to nutrition, clothing, and housing.

Issue 3: Gender-Based Barriers to Access to Justice

Even as the financialization of housing expedites and increases the eviction of marginalized women and gender-diverse people, access to justice remains particularly elusive for those in this group who experience informal and illegal evictions, or face barriers to engaging in Landlord Tenant Board processes.

While eviction is a key pathway into homelessness amongst women and gender-diverse people in Canada, few are able to access legal supports, advice, or representation that would assist them to prevent eviction, navigate the process, or seek redress for illegal acts by landlords and others.³⁶ [The Pan-Canadian Survey on Women’s Housing Need & Homelessness](#) found that almost a third of women and gender-diverse people experiencing homelessness (27.9%) were unable to access the legal help they needed it.³⁷ Power imbalances between financialized landlords and marginalized tenants make access to justice a critical pillar of tenant protections in financialized housing markets. Gaps in legal supports are particularly concerning given the illegal treatment marginalized women and gender-diverse people report experiencing from landlords and property managers. Effective remedies for discrimination from private landlords and property managers rely on provincial, territorial, and federal human rights legislation.³⁸ However, these mechanisms in Canada are weak. As identified in a [recent Canadian submission](#) to the UN Special Rapporteur on the Right to Adequate Housing: “Rights claimants have little access to representation and assistance, and courts and tribunals have usually resisted the application of substantive equality to systemic housing and homelessness issues ... Surveys have revealed widespread discrimination on prohibited grounds in housing, yet housing cases make up a small fraction of the cases before human rights tribunals across Canada.”³⁹

Bringing formal complaints forward may be “expensive, slow, [and] unenforceable,” creating significant disincentives for trans, non-binary, and gender-diverse people to seek justice if they experience discrimination, harassment, or other illegal acts from landlords.⁴⁰

Weak access-to-justice mechanisms create an environment where financialized housing actors can avoid accountability and continue operating under regulations that put them at a significant advantage in comparison to tenants. Research on eviction proceedings at Residential Tenancy Boards/Tribunals across the country suggests that marginalized and low-income tenants face common barriers when engaging in legal processes, including clear preferences among Hearing Officers towards landlords “due to the social and financial capital that accompanies property ownership, or simply due to racism.” As such, financialized

³⁶ Schwan et al., 2021.

³⁷ Schwan et al., 2021. Importantly, young women and gender diverse people (age 13 to 24) reported significant challenges to accessing legal supports – more than any other age group. Across the sample, 52.2% of this group reported not being able to access legal advice or help when they needed it.

³⁸ Centre for Equality Rights in Accommodation (CERA), National Right to Housing Network (NRHN), & Social Rights Advocacy Centre (SRAC). (May 2021). *Submission to UN Special Rapporteur on the Right to Adequate Housing - Housing Discrimination & Spatial Segregation in Canada*. <https://www.ohchr.org/Documents/Issues/Housing/SubmissionsCFIhousingdiscrimin/CERA-NRHN-SRAC.pdf>

³⁹ CERA, NRHN, & SRAC, 2021, p. 7.

⁴⁰ *Ibid.*

landlords hold structural power that results in extremely high eviction rates and a denial of justice among marginalized women and gender-diverse people.^{41 42}

An eviction prevention focus in all Residential Tenancy Boards/Tribunals is critical to address the impacts of financialization, particularly for marginalized women and gender-diverse tenants. Women, girls, and gender-diverse people must be able to claim their right to housing and have access to justice for Canada to fulfill its obligations under international human rights law and the *National Housing Strategy Act*. As articulated by the Special Rapporteur on Adequate Housing a thematic report on the right to life and the right to housing, “The right to adequate housing is too frequently disconnected from the human rights values which form its core, and is treated more as a socioeconomic policy aspiration than as a fundamental right which demands effective, rights-based responses and timely access to justice.”

Issue 4: Gaps in Data, Monitoring, and Accountability

In the context of the financialization of housing, the lack of data on evictions across Canada creates the systemic conditions for mass right to housing violations, including along lines of gender. The severity of data gaps on eviction, and the paucity of monitoring mechanisms nationally, means that financial actors capitalizing on housing markets can systemically violate the right to housing for women and gender-diverse people with relative impunity.

Across Canada, one of the greatest challenges to preventing and addressing violations of the right to housing in the context of financialization is lack of data – particularly on evictions. ACTO found “that since 2015 there has been a dramatic increase in landlord applications to reclaim properties for their own personal use (of 85%) and for ‘renovictions’ (a 294% jump). However, there is no comprehensive or ongoing monitoring or analysis of such data. As one recent media piece stated: ‘No one counts how many Ontarians are served evictions annually, or what effect it has on the housing market.’”⁴³

These gaps in data are gendered as well – the scale and depth of impacts of financialization remains unknown due to limited gender-segregated data or analysis on evictions regionally and nationally. Even lesser data is available that is able to demonstrate intersectionality in a meaningful way and recent equity-focused analyses have failed to explore gender.⁴⁴

Existing data is often anchored around formal evictions because informal evictions take place outside the purview of services and systems where data collection occurs. This means that, much like experiences of hidden homelessness, data largely fails to capture the scope and scale of evictions faced by women and gender-diverse people – who are much more likely to experience hidden homelessness and regularly experience informal evictions, including due to abuse and relationship breakdowns.⁴⁵ Further, because informal evictions are often invisible to our current data collection methods, services set up to help people

⁴¹ Buhler & Tang, 2019.

⁴² *Ibid*, p. 224.

⁴³ Zell & McCullough, 2020, p. 105.

⁴⁴ Leon, S., & Iveniuk, J. (2020). *Forced out: Evictions, race, and poverty in Toronto*. Wellesley Institute.

⁴⁵ Schwan et al., 2022.

with evictions may be based on an understanding of evictions that does not reflect the reality of eviction for women and gender-diverse people, and thus may be less effective.⁴⁶

Recommendations and “All Appropriate Means” to Realize the Right to Housing

A national review on the state of financialization in Canada is long overdue. To ensure this review equitably advances the right to housing for marginalized women and gender-diverse people, an intersectionally gendered understanding of security of tenure, financialization, and eviction must be employed. To employ all appropriate means to meet obligations under the *National Housing Strategy Act*, we recommend that the Government of Canada:

1. **Address gaps in data on evictions**, particularly focusing on gender-disaggregated and intersectional data.
 - a. Employ an **intersectional and human rights-based understanding of security of tenure** when addressing financialization and its role in evictions across the country.
 - b. Conduct a **review on provincial and territorial eviction laws and develop national standards around security of tenure**, ensuring these standards reflect the unique circumstances, needs, and challenges faced by marginalized women and gender-diverse people.
2. **Review and revise the *National Housing Strategy* to include stronger and clearer gender-based targets.** Outcomes for marginalized communities need to be tracked and monitored through publicly-available disaggregated data, upholding strong affordability criteria in perpetuity.
3. **Demonstrate federal leadership and intergovernmental collaboration to advance the right to housing for women and gender-diverse people**, utilizing bilateral agreements and spending power to ensure gender-based targets, supports, protections and data collection at other levels of government.
4. **Invest in programs that preserve existing affordable housing stock and strengthen the social/community housing sector, such as a Federal Acquisition Program.**
5. **Invest in alternative housing models as means to counter financialization**, with a focus on creating sustainable and local housing solutions that generate community governance and wealth – particularly for Black and Indigenous communities.
6. **Require that government-funded projects do not result in demovictions or renovations of existing tenants.** A right to housing approach should be employed when disseminating funding for housing projects, utilizing need-based data like the Housing Assessment Research Tools (HART) to address the unique and intersectional housing needs in each community.
7. **Review and revise government policies that drive financialization**, such as lack of private-sector regulation, taxation loopholes, and low-interest borrowing.
8. **Invest in gender-sensitive eviction prevention programs** that are responsive to the unique ways in which marginalized women and gender-diverse people experience evictions in the context of financialized housing markets, seeking to ensure this group is not de-housed and displaced.

⁴⁶ Zell & McCullough, 2020.