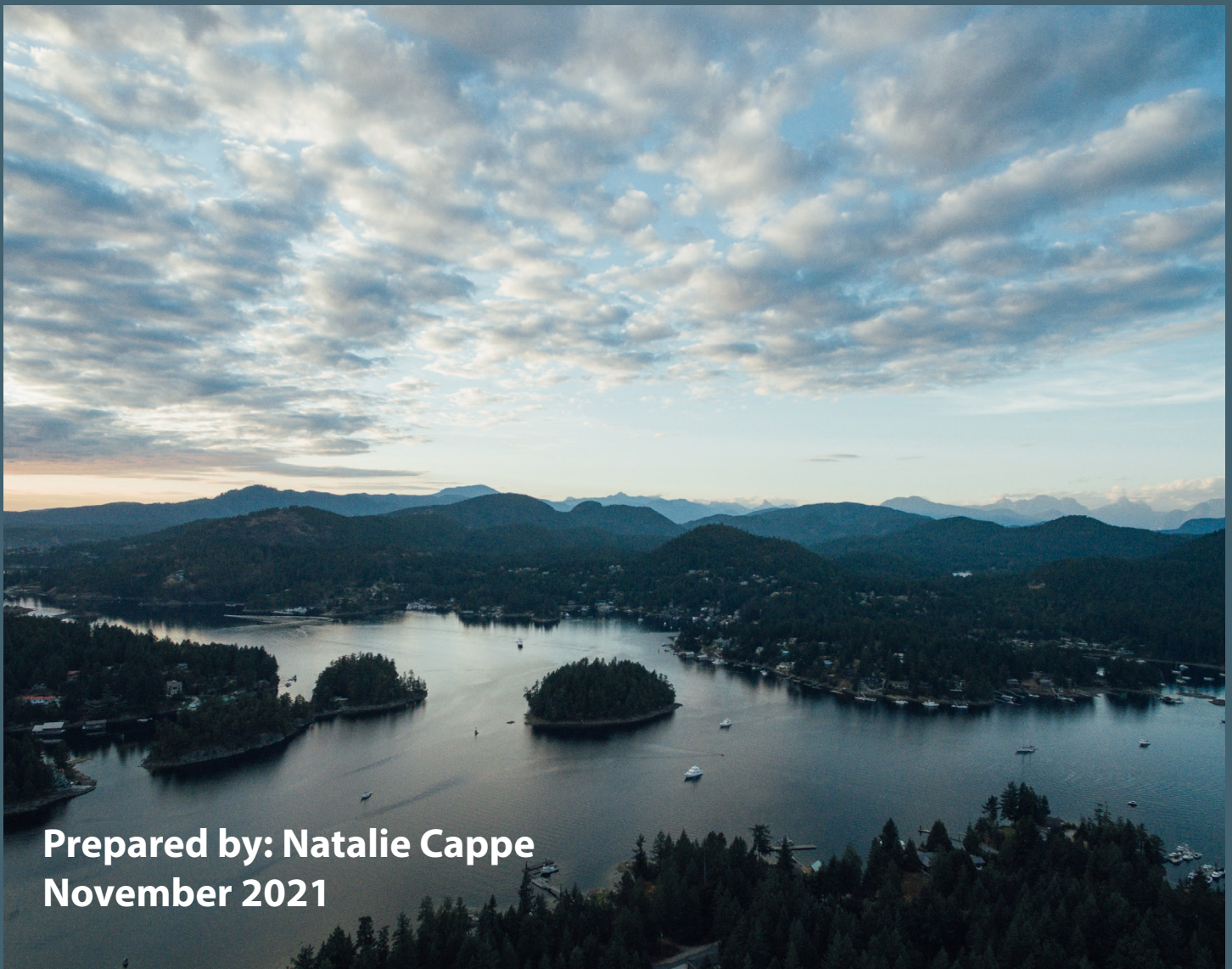




# Assessing the Internal Capacity of Urban-Indigenous Housing Providers in British Columbia

A collaborative research study between the University of British Columbia's Housing Research Collaborative and the Aboriginal Housing Management Association. Funded by a Mitacs Accelerate Internship.



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November 2021**

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# A Message from the Team

## Acknowledgments

This study was funded by a Mitacs Accelerate award granted in June 2021. All research was conducted in collaboration with the Aboriginal Housing Management Association (AHMA), and the Housing Research Collaborative of the University of British Columbia's School of Community and Regional Planning. The research would not have been possible without the leadership and knowledge of four individuals:

Cliff Grant (AHMA)

Nizar Laarif (AHMA)

Dr. Penny Gurstein (UBC)

Craig Jones (UBC)

Joanne Nellas (UBC)

Riley Mcleod (UBC)

We are also extremely grateful for to all urban-Indigenous housing providers who contributed to this research through research interviews.

## Purpose and Protocol

This study aims to yield political action to address urban-Indigenous housing needs in the province of British Columbia. The project was designed and conducted in collaboration with the Aboriginal Housing Management Association and the University of British Columbia's Housing Research Collaborative and endeavors to situate those with a nuanced and first-hand perspective on Indigenous Social Housing at the forefront of the conversation. All research collaborators were briefed on the purpose of the study prior to their participation. University ethical protocols were upheld to ensure participant safety and wellbeing during the research collection process. The information collected will be leveraged during provincial and federal lobby efforts to support urban-Indigenous housing in the province of British Columbia.

# Executive Summary

Urban-Indigenous Peoples' housing needs are consistently overlooked by provincial and federal government authorities in Canada. Legislation surrounding Canada's fiduciary obligations towards Indigenous Peoples does not clearly articulate jurisdiction over the urban-Indigenous demographic, which has established a distinct service gap with regard to urban-Indigenous housing. In addition, Canada's 2017 National Housing Strategy (NHS) fails to specifically account for urban-Indigenous housing needs. The lack of resources available to the urban-Indigenous demographic is especially concerning given that the 1985 and 1986 Urban Native Housing Program (UNHP), one of the only government programs providing core-funding for urban-Indigenous housing providers, is due to expire at the end of 2028. With the lack of recognition of urban-Indigenous housing needs by provincial and federal government, the NHS' failure to account for the urban-Indigenous demographic, and the looming expiry of the UNHP, it is unclear whether urban-Indigenous housing providers will have the capacity to continue operating their services in the future. The majority of Indigenous Peoples in Canada as well as in the province of British Columbia (BC) reside in urban environments. As such, the expiry of the UNHP and lack of planning for the future of urban-Indigenous housing has the potential to yield catastrophic consequences, particularly the involuntary displacement of current tenants relying on housing services operated under the UNHP.

Despite the urgent need to address a severely underfunded demographic, urban-Indigenous housing providers have largely been left to their own devices to prepare for the expiry of their core funding from the UNHP. As the administrative authority of 43 off-reserve Indigenous housing services in the province of BC, the Aboriginal Housing Management Association has undertaken a review of the internal capacity of their partner organizations to:

1. Assess housing providers' capacity to currently operate housing services
2. Assess whether housing providers will have the capacity to maintain and expand housing services in the future

Through our research process, the answers obtained to these questions clearly outlines the need to continue supporting urban-Indigenous housing providers at a greater capacity. In addition, information collected during key-informant interviews suggests the resources currently available to subsidize urban-Indigenous housing remain remarkably insufficient to meet the demand.

\*The Appendix at the end of this report provides a list of key definitions pertaining to urban-Indigeneity and Indigenous housing in Canada. Please refer to the definitions as needed\*

# Introduction

In 2017, the Canada Mortgage and Housing Corporation (CMHC) established its first ever National Housing Strategy (NHS) titled ‘A Place to Call home’. The strategy aims to address urgent housing issues across the country that disproportionately affect vulnerable populations, particularly “women and children fleeing family violence, Indigenous peoples, seniors, people with disabilities, those dealing with mental health and addiction issues, veterans and young adults” (NHS pg. 4, 2017). In 2017, the strategy accounted for \$40 billion allocated to programs to establish 100,000 new housing units and provide improvements to 300,000 existing units. The program has since increased to \$77 billion worth of funding to support housing in the country. The goal of the strategy is to provide long-term sustainable housing to improve community wellbeing. Millions of dollars within the NHS (as described below in table 1) have been designated towards improving housing available to First Nations, Inuit and Métis People, however, a distinctions-based approach, whereby Indigenous individuals must meet one of the three aforementioned criteria, often neglects the urban-Indigenous demographic.

Funds Dedicated from NHS	Indigenous Housing Initiative
\$554.3 million	Improving housing on First Nations Reserves
\$10.4 million	Shelters for victims of family violence
\$80 million	Housing for Inuit People
\$5 million	Housing Internship Initiative

Table 1

Urban-Indigenous Peoples, those dwelling permanently or settling in urban environments for any given period, often fall through jurisdictional gaps preventing them from accessing funding through distinction-based programming due to their lack of connection to an Indian Band, Reserve, or Indigenous organization. While the federal government has committed to direct \$179 million per year (as described in table 2) to address urban, rural and northern Indigenous housing issues, particularly homelessness (Segel-Brown, 2021) such funding is insufficient to address the severity of the situation, as the majority of Indigenous Peoples live off reserve and are more likely to experience housing precarity than non-Indigenous people.

Amount of Funds Dedicated from the NHS	Indigenous Housing Initiative
\$26 million	“Indigenous housing programs”
\$23 million	“Non-targeted housing programs”
\$41 million	“Homelessness programs”
\$90 million	“Indigenous housing strategies”

Table 2 (Language used from Segel-Brown 2021, pg. 3)

# Introduction

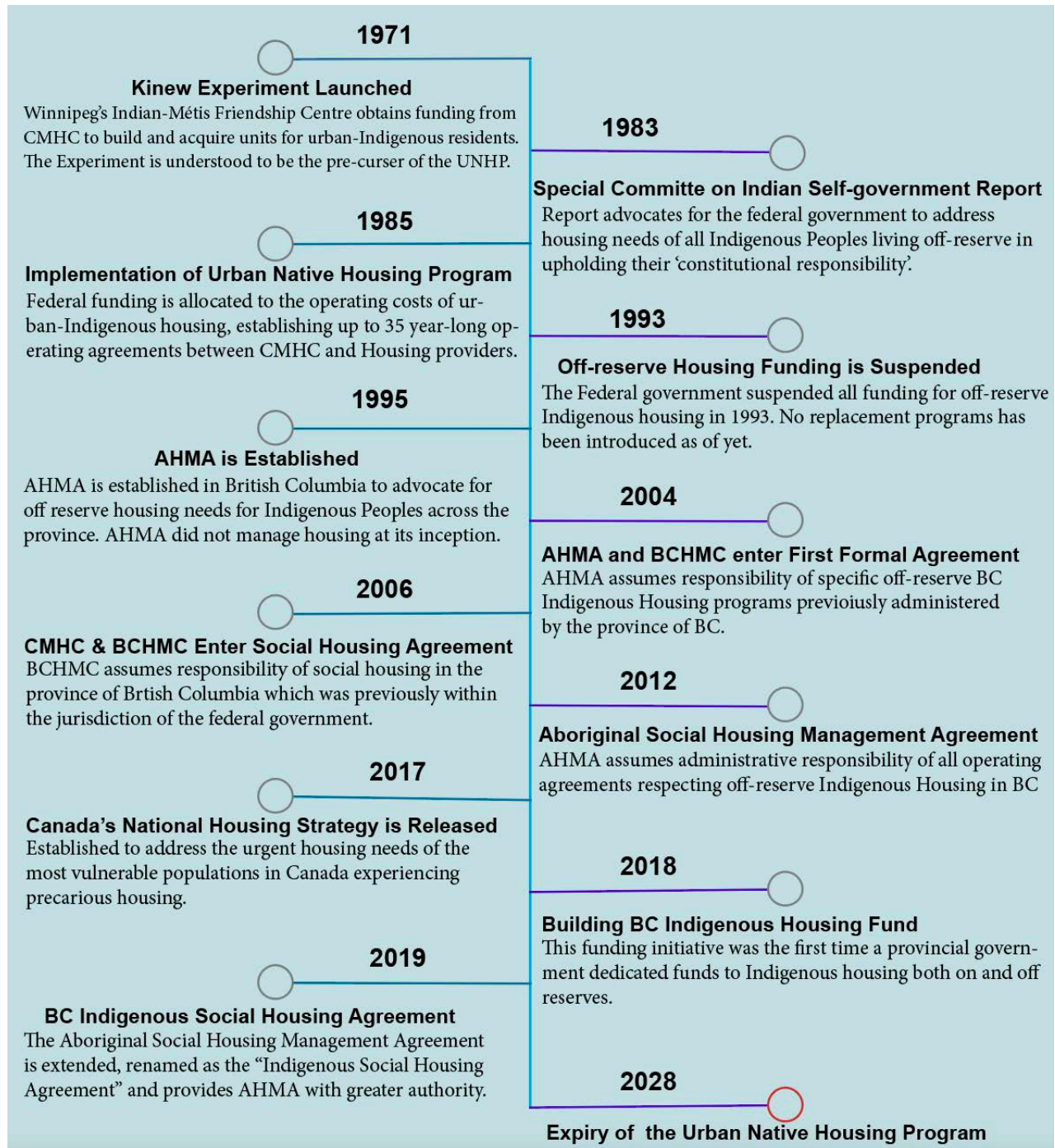
The NHS's distinction-based approach to funding and lack of attention to the majority population of Indigenous Peoples establishes a severe service gap at one of the most inopportune times in the urban-Indigenous housing landscape. For the past 30 years the Urban Native Housing Program (UNHP) and Rural Native Housing Programs (RNHP), first introduced in the 1980s, has funded the operating costs and covered the mortgages of many urban-Indigenous housing providers in Canada. Despite urban and rural Indigenous Peoples being one of the most underserved demographics in Canada, “these two programs account for \$257 million in planned spending over the 10 years of Canada’s National Housing Strategy” equating to only about 0.8% out of the \$30.6 billion “in total planned budgetary expenditures over the term of the NHS (Segel-Brown pg. 19, 2021). In addition, both the UNHP and the RNHP are due to expire at the end of 2028, and the federal, nor any provincial governments have committed to establishing a replacement program to serve urban-Indigenous housing providers. In preparation for the expiry of operating agreements (OAs) under the UNHP and in the response of the NHS’s evident lack of consideration for urban Indigenous People, the Aboriginal Housing Management Association (AHMA) is establishing an independent 10-year urban, rural and northern Indigenous Housing Strategy in the province of BC. The research presented in this report was undertaken to support the development of AHMA’s housing strategy by outlining the baseline from which urban-Indigenous housing providers operate services and articulating what is needed to expand services to better address their demand.

## Capacity and Capacity Building

This report begins to assess the internal capacity of urban-Indigenous housing providers to currently operate, and subsequently build capacity to sustain their housing services in the future. When discussing capacity, we assess whether providers are adequately funded, whether they can effectively operate their services based on the resources to which they have available, whether they are adequately staffed and that staff are properly trained to manage buildings and attend to tenant needs, and whether providers are able to meet the demand for their services. Also explored is what individual housing providers are doing to increase their capacity to manage urban-Indigenous housing portfolios after the expiration of the UNHP. These criteria are explored in the results section of this report.

# The Aboriginal Housing Management Association (AHMA)

AHMA is an Indigenous-operated non-profit umbrella organization that oversees the management and funding of 43 urban and rural-Indigenous housing providers in British Columbia (BC). It is the only housing authority of its kind in Canada, and the second to exist in the world at large. Please refer to the timeline below for an overview of the Indigenous social housing landscape in BC.



# Urban-Indigenous Housing Precarity

The precarious state of housing common among urban-Indigenous Peoples cannot be discussed without acknowledging the colonial policies that have prevented, and continue to prevent the urban-Indigenous demographic from accessing adequate housing in urban centres. Upon initial contact with European settlers, colonial authorities imposed paternalistic policies over Indigenous Peoples' traditional territories (Christensen, 2017). Through coercion, physical and cultural violence, Indigenous practices of organizing society and stewarding land were overpowered by Euro-centric ideals. As the number of settlers arriving in Canada increased, so too was the amount of Indigenous territory that was forcefully dis-possessed (Edmonds 2010). In addition, policies enforced by the federal government have explicitly targeted Indigenous Peoples, particularly women and children, thus preventing them from accessing adequate housing throughout their lives. The following section outlines key events, policies, and phenomena that led to a significant proportion of the reserve population to either temporarily or permanently migrate to urban centres, and why this population has notoriously high rates of housing precarity.

## Forced Displacement:

Pervasive tropes in Canadian society continue to communicate that the notion of 'urban' and 'Indigenity' are fundamentally incompatible, as Indigenous peoples were perceived as an impediment to colonial progress due to their perceived inability to adapt to contemporary society (Walker 2008). In addition, a high concentration of Indigenous Peoples in an urban context was said to impose blight on a city because it was widely believed that Indigenous way of life were in direct conflict with capital growth and urban development (Stanger-Ross 2008). At the time in which many cities were established in Canada, policies were enforced to systematically remove Indigenous reserves from what was asserted as Crown Land. Important to recognize is the fact that virtually all land in what we now call Canada still rightfully belongs to Indigenous Peoples (Edmonds, 2010). Through a variety of different policies, First Nations Peoples in particular were coerced to vacate their lands for the expansion of the colonial empire and left with no choice but to reside in cities.

## The Removal of Children from their Homes:

The 'Sixties Scoop' is the colloquial name assigned to a period between the mid and late 1900s where a significant number of Indigenous children were unlawfully adopted out of their Indigenous families and raised by primarily non-Indigenous families (Vowel 2017). The child welfare system in Canada justified the removal of Indigenous children from their homes by arguing that they were not provided adequate care by their Indigenous parents (Hanson 2009). Upon being adopted, many Indigenous children were raised in urban centres, and in many instances, lost all connection to culture and community. Indigenous Peoples who were adopted at a young age often lack the documentation or connection to place, and thus have no right to Indian Status or Band membership. The forced removal of youth from Indigenous homes has led many Indigenous Peoples to be raised in urban centres. The systems that continue justify the removal of Indigenous children from their Indigenous homes, families, and communities has been described as contemporary manifestation of the Sixties Scoop that robs generations of Indigenous Peoples of their cultural heritage.



# Urban-Indigenous Housing Precarity

## Discriminatory Legislation:

Prior to 1985, the Indian Act mandated that if an Indigenous woman were to marry a non-Indigenous person, she would automatically lose her Indian status, and subsequently, her Indian rights. Before 1985, Band Membership was directly associated with one's Indian status, therefore Indigenous women lacking status were neglected membership to both their bands and their associated reserves (Hanson et al, 2009). The process whereby Indigenous Peoples lost their status is known as forced enfranchisement where those who once held status were considered as an ordinary Canadian citizen (Joseph, 2018). Such gendered-discriminatory legislation left many Indigenous women unable to pass on Indian status to their descendants, thus implicating future generations. In fact, it only took two generations of an Indigenous woman marrying a non-Indigenous man for an entire generation to lose their status (Hanson et al, 2019). After being systematically excluded from their communities, Indigenous women were often left with no choice but to establish themselves in an urban context, often far removed from community.

## Off-Reserve Migration:

Youth are leaving reserves at a significant rate in pursuit of economic and educational opportunities that are unavailable on their own territory (Anderson, 2013). In addition, reserves are unable to accommodate the rapidly increasing population of Indigenous Peoples in Canada, forcing many individuals and families to seek alternative living situations. Finally, many reserves in Canada lack adequate housing and sanitation (Robson, 2008), prompting Indigenous Peoples to seek improved housing conditions in an urban setting (Cooke and O'Sullivan, 2014).

# Urban-Indigenous Housing Solutions

The systemic inequalities associated with Indigenous housing precarity frequently go unacknowledged in social housing policy. Indigenous-specific housing providers, however, approach Indigenous housing needs with greater understanding and appreciation for the circumstances from which Indigenous peoples seek housing services. Studies have demonstrated that the housing outcomes of Indigenous Peoples along the housing continuum are improved when serviced by Indigenous organizations rather than standard social housing models (Walker 2008). As such, it is critical that Indigenous housing organizations are sustained to ensure Indigenous housing needs are being adequately addressed.

## Urban Native Housing Program

The Urban Native Housing Program (UNHP) was established in the 1980s by the Canadian Mortgage and Housing Corporation (CMHC), a Crown corporation dedicated to addressing and providing housing for all in Canada. “The program allowed non-profit housing societies to purchase or construct housing units for low-income rentals [while] CMHC subsidized the difference between revenues generated from rent” (Palmer and Associates 2007). It emerged because of the severe service gap to which many urban-Indigenous residents are subject, thus exacerbating their vulnerability to experiencing precarious housing (Walker, 2008). The program offers the opportunity to address the specialized housing needs of many urban-Indigenous Peoples in a culturally appropriate manner (Walker 2008). The majority of the funding was allocated through 25–35-year operating agreements (Palmer and associates 2007) and enabled housing providers to pay off the mortgages attached to their assets (HPK, 2013). There are two streams of the UNHP:

**Pre 1986** – a combination of rent-geared-to-income units (RGI) and market rents. Funding was allocated under this stream between 1978 and 1985 (HPK, 2013)

**Post 1985** – all units are RGI. Funding was allocated under this stream between 1986 and 1993

The subsidies offered to housing providers through the UNHP are calculated based on the “difference between the estimated tenant revenue and operating expenses set out in the approved annual budget” (HPK, 2013). Throughout the 1970s alone, 92 Indigenous housing providers (non-profit organizations) were established and funded by the UNHP Nation wide. The housing provided under UNHP has proven to be an essential service, as traditional social housing models tend to overlook the specific needs of urban-Indigenous Peoples. With the majority of Indigenous Peoples in Canada now living in Canada, scholars and housing advocates have long argued for the maintenance of core funding for Indigenous housing providers as the UNHP is scheduled to expire in 2028.

# Research Process

In evaluating the importance of the Urban Native Housing Program, AHMA, in collaboration with the University of British Columbia's Housing Research Collaborative designed and executed a study to determine what capacity is needed to sustain the essential housing services funded under the UNHP.

## Research Question

All research activities undertaken for this research aimed to address the following questions:

*What is the internal capacity of urban-Indigenous housing providers under the UNHP to address the demand for housing? Do housing providers have the internal capacity to maintain services after operating agreements under the Urban Native Housing Program expire?*

## Research Scope

While many Indigenous Peoples living off reserve also reside in rural and northern locations, this study focuses explicitly on the unique challenges facing Indigenous Peoples in urban environments, and the organizations that have been established to address the needs that are neglected by standard social model. Urban-Indigenous housing is a timely issue to explore with the looming expiry of the Urban Native Housing Program in 2028, and the lack of subsequent provincial or federal support dedicated to housing the urban-Indigenous demographic. The information included in this report is drawn from thirteen of AHMA's fifteen partner organizations that are funded under the UNHP. Representatives from six out of the fifteen organizations with UNHP operating agreements were available to engage in one-hour long key-informant interviews where they were asked to speak about their current operating capacity, the challenges they face, and their priorities to best serve their community in the future. Information about the 9 remaining housing providers was obtained through interviews previously conducted by Indigenuity Consulting Group Inc, a consulting firm hired by AHMA to support the development of a ten-year urban-rural and northern Indigenous housing strategy, as well as Asset Planner Data, AHMA's database that logs detailed information about assets held and services offered by each housing provider.

## Methodology

First, an application was submitted to the University of British Columbia's Behavioural Ethics Board to grant approval for conducting research with external collaborators. Then, a literature review about the context of urban-Indigeneity was conducted. Next, a scan of previously collected information in AHMA's database about urban-Indigenous housing provider's internal capacity was reviewed and thematically analyzed to identify significant obstacles affecting the delivery of housing programs. Key-informant interviews were then conducted with six different operators of urban-Indigenous housing from AHMA's partner organizations. The six housing providers interviewed were asked to speak to the questions indicated in the table below to provide information about the current and future capacity to continue operating urban-Indigenous housing services.

# Interview Process

Nine transcripts from previously conducted interviews by Indigenuity were also analyzed in the production of key findings. A total of fifteen interviews analyzed in this research, six of which were conducted by the research team included in the acknowledgements section on page 1 of this document, and nine of which were conducted in the spring of 2021 by Indigenuity Consulting Group Inc.

1. Could you describe the kind of housing program(s) that your organization runs?
2. As you know, the Urban Native Housing Program (UNHP) is expiring in 2028. Housing providers are being encouraged to prepare for when UNHP funding expires. Has your organization begun to think about how to manage housing units/housing services after the expiry of the UNHP?
3. Has your organization encountered any obstacles while preparing for expiry?
4. With the expiry of the UNHP, many urban-Indigenous housing providers will lose their core funding stream. Is your organization exploring options for diversifying funding sources? (i.e. through fundraising/partnerships with other organizations)
5. Does your organization experience difficulty retaining staff members in the long-term? (If yes, would you be able to name the reasons why you believe this occurs)
6. Are there any resources required to encourage staff members to stay longer?
7. Do staff members currently undergo specialized training to support tenants? If not, are there any trainings you believe staff members should complete to best serve the tenants?
8. Are there any staff roles that are currently vacant but should be filled?
9. From your perspective, are your housing facilities adequately staffed (on average)?
10. Are there any programs, resources, or funding opportunities that would improve internal capacity?
11. How has UNHP impacted your organization? Successes and/or challenges?
12. How has UNHP contributed to your society's short and long-term goals?
13. Were there any features of the program that worked well? What features did not work so well?
14. Does your organization currently have sufficient funding to operate necessary housing services and programs?
15. Are you able to meet the demand for housing with your current funding?
16. If funding were not a limitation, what would your organization do to expand your Indigenous housing program?

After interviews were complete, materials from all interviews with housing providers including notes and transcriptions were reviewed and coded and thematically analyzed using NVIVO analysis software. 6 key findings were drawn from the interview data as summarized in the following 'Results' section of this text.

# Results

## Finding 1: Financial & Operational Capacity is Currently Limited

Overall, the 13 housing providers assessed in this research, all funded under the UNHP in the province of BC, appear to presently have limited capacity despite their comprehensive operating agreements managed by AHMA. The two most pressing capacity issues experienced by housing providers are:

### A) Limited Available and Qualified Staff Members

Housing providers interviewed for this research explained that hiring and retaining qualified staff remains a significant challenge for two key reasons. The first is that it is difficult to find and subsequently hire the right people to attend to the complex responsibilities of those operating and managing urban-Indigenous housing. Often tenants have specialized needs that are not adequately accommodated under traditional social housing programs or the expertise of their staff. Urban-Indigenous housing providers therefore require unique perspective, understanding, and training to ensure tenant needs are satisfied. The second issue that arises is the constant fluctuation of staff members at 11/13 housing providers assessed for this project. The lack of staff retention occurs because urban-Indigenous housing providers are usually unable to offer competitive wages. Providers also note that the difficult work for which their staff are responsible is not adequately compensated by the associated salary. It is important to note that hiring and training new staff members sucks up a lot of time and resources from an often under-resourced housing manager. As such, it can be frustrating for providers when staff-turnover is frequent. These staffing issues compromise the operating capacity of urban-Indigenous housing providers.

### B) Limited funds Under Operating Agreements to Expand and Adapt Services

Current UNHP operating agreements, although relatively comprehensive, remain insufficient. 9/13 interviewed for this project have multiple funding streams (often from organizations including CMHC, BC Housing, Provincial Health Authorities, and Homelessness prevention programs) yet still struggle to operate within their budget. 11/13 indicated that more funds are required to subsidize rent for tenants and to maintain the condition of units and buildings. Some providers with large portfolios can adequately fund a portion of their buildings/programs, while others under the same portfolio require increased revenue to operate effectively. In addition, some providers can secure sufficient funds to subsidize rents for a portion of their demographic being served, while others are more difficult to serve. One housing provider used the example of seeking funding for Indigenous men versus Indigenous women. According to the provider, it was easier to obtain external funding for Indigenous women than for Indigenous men. As such, funding may not be evenly distributed to best serve all tenants.

*While this research suggests that nearly participating Indigenous housing providers are operating under capacity, it is essential to acknowledge, honour, and uphold the tireless work of the individuals operating housing societies- those who ensure tenants in need of their services are well looked after. The housing providers interviewed in this study understand that adequate housing is more than simply a roof over one's head. As such, they constantly dedicate an incredible amount of time and energy to alleviate the housing disparities experienced by urban-Indigenous Peoples and to establish a 'sense of home' that would not otherwise be accessible to their tenants.*

# Results

## Finding 2: Larger Organizations are Better Situated to Build Internal Capacity

Based on the interviews with 13 housing providers, larger organizations under AHMA's management funded under the UNHP - those that own, manage and operate upwards of 19 buildings, are more likely to be able to build their internal capacity than smaller organizations. This is because larger societies are more likely have access to surplus units and properties to redevelop to without jeopardizing the housing of tenants. In addition, large organizations have more flexibility to shuffle tenants around if buildings requiring redevelopment in order to meet conditions standards. Finally, from the sample of interview data analyzed, large organizations seem to have wider networks with other organizations and funding agencies with whom they partner on re-development projects. As such, they are better positioned to build capacity than smaller organizations with fewer assets and fewer external connections.

## Finding 3: Expiry of OAs Requires Housing Providers to Maximize Revenue

Housing providers with looming expiry of operating agreements appear to be faced with three options:

1. Re-develop units to build density
2. Sell assets and allocate revenue toward the operation of existing units
3. Raise rents for current tenants to help cover operating expenses

All of the options have the ability to negative impact tenants, however, providers seem to be left with no choice if they are to sustain current programming. The expiry of operating agreement has required providers, if they had not already, to consider how to generate revenue from their portfolio. While any organization requires a steady stream of income to effectively operate services, it is concerning to consider that some societies may not have the capacity to put tenant needs first if they are struggling to acquire sufficient funding and collecting revenue to operate.

# Results

## Finding 4: Providers are Concerned about Displacing Tenants as OAs Expire

9/13 housing providers indicated that they are looking into re-developing some, if not all their assets to build density, and to operate market-rate housing to subsidize those living in rent-geared to income units. As explained above, some providers have even explored selling their most commercially valuable assets to subsidize their units dedicated to their lower-income tenants. While plans to redevelop and sell assets is a reasonable avenue for providers to adapt to the changes in their funding landscape, the housing security of tenants are inevitably placed at risk. Some providers have plans to rehouse all tenants during construction of buildings being re-developed or those being sold, however, others only have the capacity to simply warn their tenants about what may happen to their units upon expiry of operating agreements. Those without plans to rehouse tenants when changes are made to their housing accommodation likely lack the space and capacity to relocate all tenants relying on the society's sustained operation. Provider's utmost concern appears to be the probable displacement of tenants, particularly those most likely to experience homelessness without access to culturally appropriate RGI units. Urban-Indigenous housing is a unique branch of social housing, and upon expiry of operating agreements, it is unlikely that displaced tenants would be able to access adequate housing elsewhere.

## Finding 5: Building Capacity Requires Funding for Urban-Indigenous Peoples

4/13 housing providers emphasized the importance of considering Canada's urban-Indigenous population as a distinct demographic with specialized housing needs. All interviewees reiterated how operating agreements catered to urban-Indigenous housing are foundational to the operation of their organizations that serve a consistently under-resourced demographic. Urban-Indigenous Peoples have wound up living in precarious situation in cities by no fault of their own and terminating all funding for their housing programs could be catastrophic if housing providers lack a sound post-expiry plan. The housing providers considered in this study are essential to protection the health and safety of those who might otherwise be residing in decrepit conditions, or on the streets. The providers, according to interviews, have impeccable reputations within the municipalities in which they are situated, for sustaining a high standard of service to their tenants, and responding to any issues that may arise both professionally and efficiently. Tenants can assume that they will be well cared for in the hands of providers funded by the UNHP, and that the services offered will be culturally appropriate. In addition, UNHP units have eased the transition for those moving off re-serve into urban centres, many of whom lack community connection upon their arrival. Providers stressed that as urban-Indigenous housing becomes increasingly dire, and as the urban-Indigenous population grows, building internal capacity for providers requires the government to recognize urban-Indigenous housing needs as distinct from those outside of urban centres, and that funding for such programming is maintained.

# Results

## Finding 6: Providers Know how to Build Their Own Capacity & Serve Tenants

The final key finding that emerged from the 15 interviews is that housing providers have a robust understanding about what is needed to build their capacity to best serve their tenants. As of now, most providers are primarily concerned with maintaining current units and services, yet there are scores of services that providers endeavour to operate if sufficient funding were to become available. Below is a comprehensive list of the ways providers aspire to expand and improve their services to best serve their needs. It is important to note that housing providers themselves know what is needed to ensure capacity is built to serve the interests of tenants.

For Tenants	For Staff	Funding	Strategic Planning
<ul style="list-style-type: none"> <li>• On-site childcare facilities</li> <li>• On-site counsellors</li> <li>• Assistance for first-time home buyers</li> <li>• Family reunification programs</li> <li>• Mental health services</li> <li>• Culturally relevant programming</li> <li>• Elder care/assisted living</li> </ul>	<ul style="list-style-type: none"> <li>• More comprehensive training</li> <li>• Higher wages</li> <li>• Streamlined training for all BC urban-Indigenous housing providers</li> <li>• Job security and benefits</li> <li>• Increased HR capacity for onboarding and training</li> <li>• Hire more full-time staff</li> </ul>	<ul style="list-style-type: none"> <li>• Extend the UNHP or establish a comparable program</li> <li>• Demand commitment from government authorities to fund urban-Indigenous housing</li> <li>• Support the operation of social enterprises led by housing providers</li> </ul>	<ul style="list-style-type: none"> <li>• Regularly collect accurate data pertaining to the urban-Indigenous demographic</li> <li>• Consider the urban-Indigenous demographic as distinct, separate from Inuit, First Nation and Métis</li> <li>• Collaborative partnerships between providers</li> </ul>



# Discussion

This section provides an analysis of the key findings described in the previous section and investigates how to translate the information about urban-Indigenous housing precarity into action-oriented initiatives to improve housing outcomes. All proposed actions are informed by current information about urban-Indigenous housing in Canada.

## 1: Consider Urban-Indigenous Peoples as a distinct Demographic

The literature available on urban-Indigenous Peoples and associated housing precarity, as well as information extracted from key-informants interviews tends to point towards a common central recommendation: the need to consider urban-Indigenous as its own demographic, separate from the typical First Nation, Inuit, and Métis distinctions set out by the federal government. Federal Housing strategies dedicated to Indigenous peoples in Canada is broken down into distinction-based programming, meaning that there is a separate plan for First Nations, Inuit, and/or Métis communities. As such, those who lack a connection to their community by way of Band Membership, or those lacking Indian Status may not qualify to receive distinction-based support (Standing Senate on Human Rights, 2013), particularly those dwelling in urban environments.

Even though the urban-Indigenous population is the most populous demographic of Indigenous Peoples in Canada, there is currently no distinct funding stream dedicated to serving urban-Indigenous peoples' housing needs other than the UNHP which will be expiring at the end of 2028. As a result, "the Government of Canada's distinction-based Indigenous Housing Strategy creates a large service gap for the 87% of Indigenous Peoples not living on First Nation reserve lands" (Indigenous Housing Caucus Working Group, 2018), subjecting urban-Indigenous peoples to inadequate housing. This service gap must be bridged if urban-Indigenous housing needs are to be adequately addressed.

Housing providers and scholars alike assert that urban-Indigenous should also be considered a distinct identity because of their unique housing needs that are not accommodated through in traditional social housing services. The National Housing Strategy itself suggests that housing is more than simply placing a roof over one's head (NHS, 2017). Urban-Indigenous Peoples require access to culturally appropriate housing that considers the circumstances that has led to widespread housing precarity, as previously discussed, and provides the services and resources necessary to access adequate housing. Below is a list of common urban-Indigenous housing needs based on common themes in available literature. These needs are not adequately addressed by traditional social housing initiatives. It is important to note that these are generalizations, and the issues noted below are not an exhaustive list of all the housing needs of urban-Indigenous Peoples.

# Discussion

## Common Urban-Indigenous Housing Needs:

- Culturally appropriate housing services operated by Indigenous Peoples for Indigenous Peoples
- Access to space to practice tradition and ceremony in residence quarters
- Flexible rental agreements to accommodate for migration patterns between on and off reserve
- A sense of community in residential quarters
- Wrap around services (such as counselling services and other social supports) to help people transition to/manage city life

The demand for the Indigenous housing programs has increased as the urban-Indigenous population grows, while federal funding for such programs has remained stagnant since the implementation of the Urban Native Housing Program (explained in the subsequent section of this text) in the 1980s which is due to expire in 2028 (Collier, 2020). Maintaining support for urban-Indigenous housing services through core-funding operating agreements appears to be the best way to ensure Indigenous housing providers can meet the demand for housing.

## 2: Bridge the Jurisdictional Gaps affecting Urban-Indigenous Peoples

Despite the fact that the majority of Canada's Indigenous population reside in urban centres, the government authority responsible for their funding, support, and care, remain elusive. According to the Indian Act legislation, as was further defined in *Guerin v The Queen* [1984], the federal government of Canada has a fiduciary responsibility towards Aboriginal People (Powers 2001). In 2006, however, the managerial responsibilities of social housing were transferred from the federal government to the provincial government (Cooper 2018). Still, provinces tend to make the case that Indigenous Peoples fall strictly under the jurisdiction of the federal government (Standing Senate on Human Rights, 2013) in an attempt to divert the financial responsibility associated with urban-Indigenous housing. Under the current legislative framework, to access off-reserve programs, to be eligible, one must have "some combination of three factors: status, membership in a First Nations band, or residency on reserve" (Senate Human Rights, pg.15, 2013). As a result, "the overlap between federal jurisdiction over First Nations...and provincial jurisdiction over many areas of service provision means that responsibility for the provision of services to First Nations people living off-reserve is not clearly defined" (13). While the Aboriginal Housing Management Association in British Columbia serves the needs of all Indigenous Peoples, regardless of their status and/or association with an Indigenous community, most provinces in Canada do not have an equivalent body to advocate and manage housing units for the urban-Indigenous demographic. The jurisdictional gap that urban-Indigenous Peoples continue to fall through must be bridged to address urgent housing precarity.

# Discussion

## 3: Support and Maintain Housing Programs Run by Indigenous Peoples for Indigenous Peoples

The Urban Native Housing Program (UNHP) emerged out of a distinct lack of housing services specifically catered to urban-Indigenous residents and those that offered culturally appropriate housing. Scholars have found that it is not uncommon for Indigenous Peoples' conception of 'home' to be fundamentally different than non-Indigenous Peoples – as such, traditional social housing models may not adequately establish a sense of home for urban-Indigenous Peoples (Alaazi et al 2015). The UNHP program ensures that culturally appropriate housing catered towards Indigenous Peoples residing in urban centres is available and accessible across Canada (Walker 2008). The program has proven to yield better outcomes than status-quo social housing initiatives that refrain from addressing the unique needs of urban-Indigenous Peoples (Walker 2008). Due to the significant demand for urban-Indigenous housing, which is expected to increase as the urban-Indigenous population continues to grow (Alaazi et al 2015), it would appear that Indigenous housing services must be able to exist in their own right independently of other social housing initiatives. Federal funding directed to the UNHP has enabled Indigenous Housing providers across the country to operate housing services and pay off the mortgage of the assets acquired under the funding scheme. The funding from the UNHP is due to expire by 2028, and no funding in Canada's 2017 National Housing Strategy is specifically catered towards urban-Indigenous Peoples. Comparable programs must be sustained in order to address urban-Indigenous Peoples' housing needs. The UNHP remains one of the only federal efforts made to address urban-Indigenous housing needs whereby Indigenous peoples are able establish self-determined solutions housing precarity (Walker, 2008). The program has proven that culturally appropriate housing is capable of being established in urban centres, far away from traditional territory (Alaazi et al 2015). While the program has proven to be successful, housing providers are still operating under capacity and will require improved resources to sustain their services in the future.

# Conclusion

This research suggests that many urban-Indigenous housing providers in British Columbia are operating under capacity and require more resources to operate efficiently and meet the demand for housing in their community. As it stands, there are no provincial or federal initiatives planned to specifically address urban-Indigenous housing needs in Canada after the Urban Native Housing Program expires. As such, the capacity of housing providers to operate and subsequently sustain housing in the future is in jeopardy. In addition, the lack of clear government responsibility over the urban-Indigenous population is concerning, especially given that they comprise the high-est propensity of Indigenous Peoples in Canada, and they are most vulnerable to substandard living conditions. The high rates of housing precarity among urban-Indigenous individuals and families in Canada is too severe to allow jurisdictional barriers and expiry of funding streams to stand in the way of immediate action. The urban-Indigenous population is a distinct demographic with specialized housing needs, and as described above, cannot be adequately accommodated by standard social housing models. Urban-Indigenous housing providers have explored many avenues to which they have available to ensure tenants are able to access the programs and services required to keep them in safe and adequate housing. Their tireless work has kept thousands of Indigenous Peoples housed in culturally appropriate conditions; however, they are not able to do it all on their own. It is time for government to take responsibility for the urban-Indigenous housing precarity and ensure there is greater access to adequate housing. This is achievable by financially and administratively supporting urban-Indigenous housing providers who know how to support their tenants.

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## **Appendix**

Attending to on-reserve as well as urban-Indigenous housing needs is an urgent priority of social housing providers and administrators across Canada. The legal and political structures in which urban Indigenous housing needs are addressed are complex in part due to the uncertain jurisdiction of provincial and federal governments over this demographic. In addition, Indigenous Peoples often have specialized housing needs that are not adequately accommodated by a standard social housing model. The key terms defined here begin to outline the context in which Indigenous social housing is administered, and the propensity of jurisdictional barriers Indigenous Peoples may face when accessing housing both on and off reserve. The terminology has been organized into three key sections: those that pertain to Indigeneity in Canadian legislation, those that relate to social housing in Canada, and those that describe how housing standards are measured by national and provincial housing authorities.

### ***Federal Legislation, Legal Terminology and Amendments to the Indian Act***

#### **Aboriginal**

Aboriginal identity is defined in the Constitution Act, 1982, Section 35 (2) as anyone who is First Nations, Métis, Inuit, or registered with Indian Status. (Statistics Canada 2015). Aboriginal identity does not guarantee Indian Status.

#### **Bill C-31**

Bill C-31 is the 1985 amendment to the Indian Act that ensured status women would not lose their status upon marrying a non-Indigenous person (Vowel, 2017). The loss of Indigenous Women's status has left many generations ineligible for Band membership and/or reserve residence.

#### **Band (Indian Band)**

Bands, often referred to as "Indian Bands" or "First Nations Bands" were established under the 1876 Indian Act to create bureaucratic order between a group of 'Indians' who share a common area of land and the Canadian government. As such, colonial governance structures were imposed onto groups of First Nations Peoples who were forced to abandon their traditional practices to form what the federal government deemed a legitimate bureaucratic entity. Bands manage the "day-to-day functioning of Band affairs" (Hanson et al, 2009) and generally receive funding from the federal government to support essential services including health care and housing. Bands have a limited amount of authority over the function as the Minister of Indian Affairs has ultimate jurisdiction over legislative decisions. Funding for a Band is subject to the number of members Bands have under their jurisdiction (ISC 2016). Some Bands are associated with a reserve where their government funding is directed. Members of said Band may live on or off reserve.



## **Band Membership**

Until 1985, one required Indian Status to be considered for Band Membership (Hanson, 2009). While this is no longer the case, Bands are instead responsible for regulating membership through their own criteria mandated in their ‘membership code’.

## **Canada’s Fiduciary Duty for Indigenous Peoples**

Canada’s Fiduciary duty towards Indigenous Peoples stems from legislation including the Royal Proclamation 1763, the 1876 Constitution, and the Indian Act 1876 that deemed the Crown ultimate authority over decisions made about ‘lands reserved for Indians’ (McNeil, 2000). ‘Lands reserved for Indians’ or reserve lands are inalienable to anyone other than the Crown. This provision is said to be in place to protect the interests of Indigenous Peoples “in transactions with third parties” (McNeil, 2000). The Crown’s ultimate jurisdiction over ‘Lands Reserved for Indians’ places the Crown and Indian Bands in a *sui generis* relationship, meaning that the form of property management is unique from typical property law that contends with fee simple land (lands that be bought, sold, or redeveloped if an owner chooses to do so). The Daniels Decision (2016), a seventeen-year long legal dispute affirms Canada’s fiduciary responsibility to Métis and Non-Status Indians, however, in practice, the federal government continues to offload the financial responsibility of those living off reserve to the provincial governments, through the process known as ‘fiscal offloading’ (Standing Senate on Human Rights, 2013). The Report of Royal Commission on Aboriginal Peoples of 1996 argues that jurisdictional authority is fundamentally different than financial responsibility, suggesting that the Federal government may not necessarily be financially responsible to those living off reserve (Senate Human Rights 2013 Off Reserve).

## **Corbière Decision**

The Corbière decision of 1999 brought to the Supreme Court of Canada by the Batchewana Band, granted all off-reserve Band members the right to vote in Band council elections and thus the ability to influence the way in which federal funds are directed to support social services for the Band. Prior to the Corbière decision, Section 77(1) of the *Indian Act* restricted Band Council voting eligibility to those who are ‘residents on reserve’. The Supreme Court of Canada found this clause to be “inconsistent with section 15(1) of the Canadian Charter of Rights and Freedoms” (Powers, pg. 1, 2001) because it discriminated against individuals’ voting rights based on their place of residence. Corbière affirmed that off-reserve Band members do in fact have a stake in the outcome of Band decisions and should thereby be granted the right to vote in Band elections (Powers, 2001).

## **Indian Act**

Section 91(24) of the 1867 Constitution Act deems the Federal government “exclusive jurisdiction over ‘Indians and lands reserved for the Indians’” (Joseph, 2018). The legal regulation of Indians was “consolidated into the Indian Act, 1976” (Joseph, pg. 7, 2018) eight years after the ratification of the of the Canadian Constitution.

## **Indian**

Prior to 1985, the legal definition of Indian was any “male person of Indian blood reputed to belong to a particular band” (S.C 1876, s. 3), however, such distinction did not extend to Inuit or Métis Peoples. Past court decisions have concluded that the term Indian is inclusive of Inuit (Monahan and Shaw, 2012), Métis (Standing Senate Committee on Human Rights 2013), and non-status Indians (Daniels v Canada, 2016). There are no longer gendered provisions in the Indian Act explicitly preventing women from holding Indian Status.

## **Indian Status**

Status is the word assigned to those granted legal recognition of Indigeneity by the federal government based on bloodline. There are two categories of status Indians: 6(1) and 6(2), both of which have direct influence on the kind of Indian Status (or lack thereof) passed on to an Indigenous Persons’ descendants. A 6(1) Indian can pass status on to their children, regardless of whether the other parent is Indigenous or not (Vowel, 2017). The status of a 6(2) Indian’s child, on the other hand, is entirely dependent on the status of the other parent. A 6(2) Indian can only pass down status to their child if the other parent is either a 6(1) or a 6(2). If the other parent has no status, the child of a 6(2) Indian will not receive status.

## **Reserve**

The Indian Act, RSC 1985, c. I-5, s. 2(1) as defines a reserve as “a tract of land, the legal title to which is vested in Her Majesty, that has been set apart by Her Majesty for the use and benefit of a band” (McNeil, pg. 913, 2000). Reserves cannot be “sold, conveyed, or leased by a band...except for surrender of their interest to the Crown” (McNeil, pg. 913, 2000). In other words, the Crown has ultimate jurisdiction of reserve lands, and Bands cannot sell their lands to any entity other than the Crown. If a Band is interested in selling their lands to third parties (i.e. energy development companies), such transfer of land has to first go through the federal government according to the 1763 Royal Proclamation (McNeil, 2000). While there are over 600 First Nations in Canada, (Vowel, 2017), there are approximately “2300 Indian reserves in Canada, nearly half of which are in British Columbia” (Vowel pg. 260, 2017). Many First Nations therefore have multiple associated reserves. Reserves are only a fragment of traditional territory to which First Nations have been allotted by the federal government to use for the “benefit of the band” (Vowel pg. 263, 2017) and comprise only 0.28% of Canada’s land mass (Vowel 2017). It is important to remember that Inuit and Métis People have not been allotted reserve lands from the federal government. One need not live on a reserve to be affiliated with an associated Band (Vowel, 2017).

## *Social Housing Management*

### **Canadian Mortgage and Housing Corporation (CMHC)**

CMHC is a Crown Corporation responsible for establishing affordable and accessible housing for all living in Canada. In 2017, CMHC released its first ever National Housing Strategy (NHS) which indicates the amount of funds that have been reserved to Indigenous Peoples in Canada, yet there is no funding stream explicitly created for urban-Indigenous Peoples.

### **Culturally Appropriate Social Housing (for Indigenous Peoples)**

Housing services that provide specialized accommodations for Indigenous peoples, including access to wrap around services and opportunities to engage in cultural activities. It is designed to meet the needs of Indigenous residents and considers the unique set of circumstances that may have left the demographic susceptible to experiencing housing precarity. Often designed by Indigenous Peoples, for Indigenous Peoples and endeavours to cultivate a ‘sense of home’ compatible with Indigenous worldviews.

### **BC Housing**

The provincial body in British Columbia responsible for funding and administering social housing. In 2006, BC housing took over the administrative responsibility for social housing programs in BC Housing from the federal social housing authority, CMHC, through the Social Housing Agreement.

### **Friendship Centre**

Friendship centres administer services and resources for Indigenous Peoples living off reserves and exist to support Indigenous Peoples meeting their basic needs through a culturally relevant and community-based approach. Some Friendship centres offer housing accommodation for Indigenous Peoples off-reserve or help to ensure all Indigenous Peoples experiencing precarious housing in urban centres have an adequate place to live. Friendship centres were established to help provide a smooth transition for Indigenous Peoples migrating between reserves cities.

### **Urban Native Housing Program (UNHP)**

The UNHP emerged in the 1980s because of the dire need to address urban-Indigenous Peoples’ housing insecurities in urban environments. The program was funded by the Canadian Mortgage and Housing Corporation and initially led to the establishment of 10, 301 housing units accessible to urban-Indigenous Peoples experiencing housing precarity in Canada (Palmer and Associates, 2007). In addition, 92 urban Indigenous housing organizations were established because of the UNHP (Palmer and Associates, 2007). The program covers the operating costs of Indigenous housing providers and enables tenants to pay subsidized rental fees. The UNHP is due to expire at the end of 2028, and no comparable federal or provincial program has been proposed as a replacement.

## ***Standards of Housing***

### **Acceptable Housing**

Housing that is “adequate in condition, suitable in size, and affordable” (Samivel pg.2, 2017).

### **Affordable Housing**

Affordable housing must be less than 30% of one’s pre-tax income (Samivel, 2017). It is important to note however, that 30% of an income below the poverty line is not an accurate measure of affordable housing.

### **Core Housing Need**

A household is in core housing need if said household is unacceptable, unaffordable, and/or unsuitable, based on the definitions indicated on this page (Samivel, 2017).

### **Dwelling**

According to Statistics Canada, dwelling refers to “a set of living quarters” that are further categorized as collective or private dwellings. Collective dwellings are ‘institutional, communal or commercial in nature. Private dwelling refers to a separate set of living quarters with a private entrance” (Statistics Canada, 2012).

### **Suitable Housing**

Housing that meets the needs of all residents in a single dwelling, according to the National Occupancy Standard (NOS) requirements in terms of the number of bedrooms per household. (Samivel, 2017).