



**YWCA Ontario Submission to the
Standing Committee on Justice
Policy, Bill 173, Declaring Intimate
Partner Violence an Epidemic**

September 13, 2024



Submitted to:

*Thushitha Kobikrishna, Committee Clerk
Whitney Block, Rm 1405
99 Wellesley Street W
Toronto, ON M7A 1A2
Via email: scjp@ola.org*

This submission is endorsed by:

- *YWCA Cambridge*
- *YWCA Toronto*
- *YWCA Hamilton*
- *YWCA Niagara Region*
- *YWCA Peterborough Haliburton*
- *YWCA Muskoka*
- *YWCA Sudbury*
- *YWCA Durham*
- *YW Kitchener-Waterloo*
- *YWCA St. Thomas Elgin*



TABLE OF CONTENTS

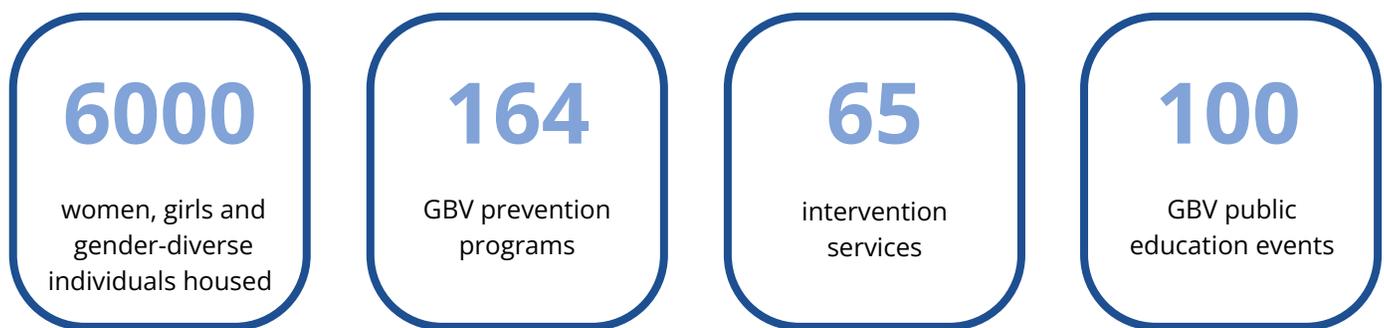
INTRODUCTION	5
RECOMMENDATIONS	8
1. Make predictable, stable and permanent investments in the Gender-Based Violence Support Services Sector	9
2. End the gendered housing crisis	11
3. Create conditions that enable women’s financial independence	13
4. Invest in women’s employment and training programming	14
5. Establish a fund for survivors of violence	15
6. Address financial abuse	16
7. Invest in prevention	17
8. Ensure the Ontario action plan to end gender-based violence meaningfully addresses the GBV and IPV epidemic	20
CONCLUSION	23

Introduction



Introduction

YWCA Ontario is a coalition of YWCA member associations across Ontario. We represent 10 YWCA Member Associations, which operate in urban centres and rural communities that stretch from the Niagara Region to Sudbury. In 2023, YWCAs across Ontario housed an average of almost **6,000 women, girls and gender-diverse individuals** each night through our emergency shelters and housing programs. We delivered **164 gender-based violence (GBV) prevention programs** and **65 intervention services**. We also delivered more than **100 GBV public education events**.



Escaping violence is not as simple as leaving. Considering the vast inequities and barriers that exist in our society that further hinder one's ability to leave is critical if efforts to address this violence are going to be successful. Financial insecurity, unaffordable housing and limited access to support services exacerbate experiences of IPV.¹ Economic prosperity and financial independence deeply impact a person's ability to leave a violent situation, as does a person's social identity. YWCAs recognize that Indigenous, Black and racialized women, queer and trans women and those with disabilities and precarious immigration status routinely face disproportionate levels of Intimate Partner Violence (IPV), which requires an intersectional lens when working to address IPV, centring those most at risk as we develop policy, interventions, programs and funding models.

¹ <https://www.ywcatoronto.org/Assets/YWCA/Documents/Advocacy/Submissions/YWCA%2520Toronto%2520-%2520Submission%2520to%2520the%2520Standing%2520Committee%2520on%2520the%2520Status%2520of%2520Women.pdf&sa=D&source=docs&ust=1725991008587620&usg=AOvVaw2xvuNPQidNc7-KgsOzF2jH>

The scale and gravity of the epidemic of Intimate Partner Violence (IPV) and gender-based violence (GBV) is well documented by numerous existing death reviews, the Final Report of the National Inquiry into MMIWG2S+, coroners' inquests, research reports and more. It is also articulated well in the submissions to the Justice Committee from Ontario Association of Interval and Transition Houses (OAITH), WomanACT², The Barbra Schlifer Commemorative Clinic³ and many others participating in this review by the Justice Committee. Many of their submissions outline extensively the costs and consequences of IPV and GBV and so we will not repeat that information in our submission.

Instead, we will take a broad view of this issue from our lens as multi-service agencies that provide a large range of key interventions that we believe, if adequately invested in, could help put an end to gender-based violence. YWCAs provide programming and supports that touch nearly every aspect of the lives of women, girls and gender diverse individuals - from emergency shelter, transitional and supportive housing, to child care, youth and gender-based violence prevention programming and employment training and reskilling. YWCAs support families fleeing violence to rebuild their confidence, recover from trauma and live meaningful lives. This work is typically underfunded or is unfunded. It is too often precarious and delivered intermittently and inconsistently while we struggle to finance our programming by fundraising through donations and one-time, small grants. We work to support women, gender diverse people and their families as they flee violence within a broken system that is no longer sustainable, or adequately responding to the many and diverse needs.

As subject matter experts, we know that the most dangerous time for a person and their children experiencing violence is when they try to leave their abuser. The reality is that some will stay in dangerous situations because they face grim

² <https://www.canva.com/design/DAGEkTURFVvk/H1lzBvKc2YpD9ytyrkkUVQ/edit>

³ www.schliferclinic.com/wp-content/uploads/2024/08/SCJP-Study-on-IPV-BSCC-Submission-July-2024-1.pdf

outcomes: poverty, homelessness, shame, and further marginalization if they leave. Then there are those who do leave only to learn that there is nowhere to go. Our shelters, and those across the province, are constantly over capacity; shelter staff are overworked and underpaid, and repeatedly forced to turn away women and children in crisis - brutal work which is taking a toll on all of us.

It is clear to us that ending IPV and GBV requires an intersectional, whole-of-government approach. The solutions cannot rest with one single level of government or ministry alone. Instead, what is required is a full commitment to GBA+ policymaking and budgeting and intergovernmental collaboration. Adequately responding to this crisis for the public health crisis it is also going to take significant investments. YWCA Ontario and individual associations have put forward multiple recommendations to address this violence over the span of decades, many of which are still relevant today and will be reiterated in our submission. We ask the Standing Committee to review the various reports and submissions encompassing recommendations that our various Member Associations have submitted in the past including the following:

- [YWCA Toronto Recommendations for Addressing Intimate Partner and Domestic Violence in Canada](#)
- [Project Willow Don't Tell Them You're Homeless Impact Report](#) – Experiences of gender-based violence among women experiencing homelessness in Waterloo Region
- [A Place Called Home - Preventing and Ending Women-led Family Homelessness in St. Thomas-Elgin](#)

Recommendations



Recommendations

Broadly, our recommendations are as follows:

1. **Make predictable, stable and permanent investments in the gender-based violence support services sector**
2. **End the gendered housing crisis**
3. **Create conditions that enable women's financial independence**
4. **Invest in women's employment and training programming**
5. **Establish a fund for survivors of violence**
6. **Address financial abuse**
7. **Invest in prevention**
8. **Ensure the Ontario action plan to end gender-based violence meaningfully addresses the GBV and IPV epidemic**

1 Make predictable, stable and permanent investments in the gender-based violence support services sector.

Make predictable, stable and permanent investments in the Gender-Based Violence Support Services Sector.

a) IPV and GBV services must be treated as essential services and funded as such through long-term, sustainable funding agreements. These vital services must no longer be treated as "projects" through short-term funding that leaves our programming and those we serve in a precarious position. Currently, we are not funded to meet the needs of survivors and are forced to spend countless hours fundraising and applying for grants in hopes of attaining enough funding to maintain critical staffing levels and continue operating the services that women, gender diverse people and their children rely on. **We urgently need long-term, adequate funding for research-backed, trauma-informed wraparound support programs.**

b) The success of our programming is contingent on the success of our shelter and housing workers who must be recognized and compensated as the skilled professionals they are. Current funding measures and the residual impacts of Bill 124 salary caps have limited our ability to pay our shelter and housing workers what they deserve.⁴ **We need increased, annualized funding for salaries and benefits to reduce turnover and its negative impacts on service delivery.**

Invest in our core funding and reduce the administrative burden on service providers related to cumbersome and bureaucratic reporting processes. Increased, annualized funding is also necessary for all shelters, sexual violence services, women's centres, legal services and PAR programs which are all currently buckling under the pressures of inadequate funding and insufficient resources to meet rising demands for services. The nonprofit care economy must receive remediation for the impacts of Bill 124.

c) **Recognize gender-based violence and housing sector workers as not only essential and life-saving but also valuable professionals through increased funding, specifically for salaries and benefits. Furthermore, provide remediation to the care-sector for the impacts of Bill 124, while also dropping the appeal.**

d) **Increase funding to ensure free, intersectional and trauma-informed mental health supports for survivors and their families, and to ensure the elimination of waitlists and irregular therapeutic supports.**

e) **Ensure programs and services offered to survivors are made widely available, providing adequate provincial investment in culturally appropriate supports that are available in multiple languages.** These programs and services include but are not limited to legal support, crisis resources, violence against women programs, and wraparound support services.

⁴ <https://www.google.com/url?q=https://rabble.ca/labour/despite-repeal-bill-124-still-wreaks-havoc-in-the-social-service-sector/&sa=D&source=docs&ust=1726060950324239&usg=AOvVaw1bZ-9rO67rPVQWfoYS1VHB>

2

End the gendered housing crisis.

The epidemic of IPV is occurring amidst a series of other crises that exacerbate this violence, including the housing crisis. The inability to afford a home or access supportive housing exacerbates IPV. No one should be forced to stay in a violent home simply because they cannot afford to leave it.

23.6 percent of single mother-led households and 15.6 percent of women-led households are in core housing need in Ontario.⁵ In total, there are more than 735,000 Ontarians in core housing need.⁶ It is also important to note the intrinsic link between the housing crisis and rising rates of IPV and GBV. Survivors of gender-based violence are more likely to become unhoused due to a lack of access to safe and secure housing.⁷ The Ontario government has shown a commitment to addressing the province's housing crisis; however, as the crisis continues to mount, more aggressive policies and substantial investments with a gendered lens are necessary. **The province must increase and annualize funding for supportive housing and wraparound services for women and children fleeing violence.**

Enacting the following recommendations could begin to address the gendered housing crisis which directly contributes to the epidemic levels of IPV we are facing in Ontario today:

a) **Ensure a range of housing options exist in Ontario**, including supportive housing options; permanent, affordable housing; transition housing; and shelters for women and gender diverse people.

⁵ <https://hart.ubc.ca/housing-needs-assessment-tool/>

⁶ <https://www.fao-on.org/en/Blog/Publications/affordable-housing-2021>

⁷ <https://doi.org/10.1177/0886260517708405>

b) Deeply invest in the capital and operations of supportive housing solutions to address the gendered housing crisis in our province. **Ensure investments meet the diverse needs of specific communities** including Indigenous women and Two-Spirit people, newcomer women, senior women, women with disabilities, LGBTQIA+ individuals and other communities who experience systemic marginalization. Consult with experts who have conducted extensive research in this field.

i) Create a meaningful investment stream for capital housing developments in order to meet CMHC's dedicated gendered housing stream requirements for investment from other levels of government.

ii) Invest in predictable, stable annualized operations funding for supportive housing provided by nonprofit experts.

c) Fund research-backed, trauma-informed wraparound programs for transitional and supportive housing. Women's organizations are experts in providing the support women need to rebuild their lives. Without these programs, women and families who are caught in a housing bottleneck and spending too long in shelters, or, worse: returning to dangerous homes.

d) Fund women's homelessness shelters and low-barrier drop-in centres to provide VAW services. Gender-based violence is a near constant experience of women experiencing homelessness. This 'no-wrong-door' approach supports greater access to counselling, healthcare and employment training.⁸

e) Infuse an additional \$60 million into the core operating budgets of VAW shelters and transitional housing to address funding shortfalls resulting from chronic underfunding of these vital services.⁹

⁸ <https://hart.ubc.ca/housing-needs-assessment-tool/>

⁹ Refer to Ontario Association of Interval and Transition Houses (OAITH) 2023 Pre-Budget Submission

3

Create conditions that enable women's financial independence.

Violence against women and women's economic security are closely connected. Research by the Woman Abuse Council of Toronto finds that financial insecurity is almost a universal experience for women who have left an abusive relationship.¹⁰

For women, children, and gender diverse people living in low-income households, the ability to meet their needs and work toward greater economic prosperity has become increasingly difficult with the rising costs of living. Current Ontario Disability Support Program (ODSP) and Ontario Works (OW) rates are far too low to adequately cover the cost of living, with a single person on ODSP in the province receiving \$1,308 (nearly \$1,000 below the poverty line) and a single parent only receiving \$1,903 (nearly half of the low-income measure).¹¹ These rates are far below the average cost of living for nearly any city in Ontario. The impacts of these rates further exacerbate disparities in income, health and social wellbeing, particularly for single mothers, women and girls living with disabilities, Indigenous women, racialized women and newcomers - some of the communities most at risk of IPV. The stark reality is that one in five single mothers in Canada raise their children in poverty.¹²

Food Bank usage has increased for the seventh consecutive year, with a more than 38% increase in 2023 from 2022, marking a 101% increase over pre-pandemic levels.¹³ With one in 10 Ontarians now accessing food banks, the dependency we are seeing on social services is extremely worrisome. In 2023, one in four food bank clients were children/youth, and 35% of food bank clients had a disability.¹⁴

We ask that your government take action to address poverty across the province by:

a) Immediately doubling OW and ODSP rates and indexing OW to inflation annually, and increasing the OW earnings exemption to match ODSP;

¹⁰ https://womanact.ca/wp-content/uploads/2020/11/WomanACT_Hidden-in-the-everyday_Financial-Abuse-Report-1.pdf

¹¹ <https://www150.statcan.gc.ca/t1/tbl1/en/tv.action?pid=1110023201>

¹² <https://womenshomelessness.ca/women-girls-homelessness-in-canada/>

¹³ <https://feedontario.ca/research/hunger-report-2023>

¹⁴ <https://www.dailybread.ca/research-and-advocacy/research/whos-hungry-report/>

- a) **Ensuring that once implemented, the Canada Disability Benefit (CDB) serves as a supplement — not as a replacement — to ODSP and OW and/or private disability-related benefits and that there are no provincial clawbacks of the benefit;**
- b) **Increasing the Ontario Child Benefit and removing all immigration status-based barriers that prevent access to provincial child benefits;**
- c) **Ensuring women and all people with precarious immigration status have access to income support and an expedited path to permanent residency; and**
- d) **Ending all discriminatory social assistance requirements that prevent women with precarious status from being able to attain housing and social assistance, including child benefits.**

4 Invest in women's employment and training programming.

The province has shown that it sees the value in promoting women's employment, particularly in male-dominated fields where labour shortages pose serious challenges for employers. Getting more women in male-dominated fields is about more than giving them additional training. YWCAs across the province have seen more success when wraparound supports including those which help women build confidence and prepare them for the workplace over typical, shorter-term training programs. Getting more women in the workforce and enabling them to reskill and upskill not only provides that vital economic security - particularly necessary for women at risk of or experiencing IPV - but it also means boosting the province's GDP.

- a) **Increase investment in paid training programs for low-income and newcomer women in STEM and the trades.** Sustaining well-paid, stable employment is the key to retaining safe housing and raising healthy children.¹⁵

¹⁵ <https://doi.org/10.1037/dev0000438>

Making well-paying jobs more attainable through specific training programs, delivered in supportive environments, enables positive employment outcomes. Specifically, we recommend this government:

i) Increase investment and availability in all four streams of the Women's Economic Security Program (WESP).

ii) Eliminate non-paid training programs so that all women and gender diverse people can support their children while increasing their earning potential, and Ontario can increase the number of skilled workers in these critical fields.

iii) Boost funding for case management support from the pre-employment stage through the first months of work to maximize success, especially for newcomers and other women with fewer resources.

b) Introduce required, proactive training, and accountability for employers to promote safe, equitable workplaces and end gendered and sexual harassment, particularly, in industries where the government is working to improve women's participation.

c) Explore the implementation of a guaranteed livable income program that is gender-responsive.

5 Establish a Fund for Survivors of Violence.

YWCA has seen the impact of providing funds directly to survivors fleeing violence. Over the course of the last three years, YWCAs across Canada launched the country's first first-ever national fund providing financial assistance directly to survivors of gender-based violence. YWCA Canada's National Emergency Survivor

Support (NESS) Fund began its operations serving over 30 communities in partnership with 12 YWCAs across the country, including five in Ontario.

The NESS fund provides survivors with financial support to leave abusive situations - it helps to cover costs like first and last month's rent, moving expenses, storage fees, and other related costs. How the funds are used is entirely up to the recipient who knows their needs best. Beyond this immediate support, frontline staff are available to connect recipients to wraparound supports including counselling, healthcare, employment training and legal assistance. Six months after the NESS Fund's launch, 90% of recipients reported that the funding was the primary reason they were able to leave violence.

Our experience of operating the NESS Fund has highlighted the undeniable link between the housing affordability crisis and rising rates of GBV and IPV. In fact, the most common request for support from NESS applicants has been for covering rent.

Recognizing the demand for immediate funding to support women, gender diverse people and their children fleeing violence. **We urge the government to consider establishing and offering emergency funding and interest-free loans for women and gender diverse people fleeing violence.**

6 Address financial abuse

While financial abuse is increasingly recognized as a legitimate form of IPV - and, in fact, almost always a component of the abuse experienced by survivors of IPV - there remains a need to formally recognize it and to create the conditions for it to be adequately addressed. According to Woman Act, "financial abuse is a key barrier to women leaving abusive relationships."¹⁶ Survivors of economic abuse have reported that, when seeking support from social service agencies, other

¹⁶ https://womanact.ca/wp-content/uploads/2020/11/WomanACT_Hidden-in-the-everyday_Financial-Abuse-Report-1.pdf

forms of violence - particularly physical - were prioritized and the economic abuse ignored.¹⁷ This deprioritizing of economic abuse can lead to long-term economic consequences for survivors, often in the form of debt and damaged credit, making it impossible for them to rebuild their lives and end the cycle of abuse.¹⁸

In order to adequately address financial abuse, we recommend this government:

- 1. Fund research on financial abuse so that it can be quantified, qualified and identified by social service agencies, police and others;**
- 2. Call on the Federal government to mandate financial institutions to develop policies and procedures to recognize signs of financial abuse;**
- 3. As part of the province's public education efforts related to GBV, include content about financial abuse, including naming gendered stereotypes and taboos about speaking about family finances outside of the household; and,**
- 4. Fund financial literacy programming for women and gender-diverse individuals.**

7 Invest in Prevention.

We applaud the Ontario government for including prevention as a key pillar of its Ontario-STANDS action plan on GBV because, to end IPV and GBV, we cannot focus on crisis response alone. Research consistently shows that long-term programming focused on teaching concepts like healthy relationships and boundaries help reduce instances of GBV among youth.¹⁹ With upstream investments in prevention, we can stop the violence before it happens, and this is more critical now than ever as rates of violence are on a steady incline.

¹⁷ *Ibid*

¹⁸ *Ibid*

¹⁹ https://www.google.com/url?q=https://journals.sagepub.com/doi/abs/10.1177/1077801218815778?journalCode%3Dvawa&sa=D&source=docs&ust=1725986771409359&usg=AOvVaw1knguDYLIgeZiPrj_CdecR

Preventing violence does not happen through the criminal justice system. It happens through education, in early intervention programming by community-based organizations, in awareness and prevention campaigns that shift prevailing harmful norms and stereotypes.

We are glad this government has signed on to the National Action Plan to End Gender-Based Violence. These funds need to be allocated immediately and with long-term sustainability in mind. Further to that, we recommend this government:

a) **Reinstate the provincial Roundtable to End Gender-Based Violence.** There is a wealth of knowledge and resources that exists amongst GBV organizations and sector partners who work every day to address this epidemic of violence.

Reinstating the provincial roundtable presents an opportunity to leverage existing expertise of community networks and organizations that have been meeting to compile data, share resources and expertise for decades. They are an untapped resource. If the government reinstates the GBV roundtable, part of its mandate could be convening these various networks, consolidating research, data and best practices, and mapping programs, services and gaps. This roundtable could also support a needed multi-sector approach to addressing GBV across the province, including supporting the implementation of a province-wide strategy to end GBV.

b) **Implement the calls to justice of National Inquiry on Missing and Murdered Indigenous Women and Girls (MMIWG) final report.**²⁰

c) **Prioritize funding research initiatives on the impacts of domestic and intimate partner violence to ensure more up-to-date information.** Updated research would aid prevention efforts.²¹

²⁰ <https://www.mmiwg-ffada.ca/wp-content/uploads/2019/06/National-Inquiry-Master-List-of-Report-Recommendations-Organized-By-Theme-and-Jurisdiction-2018-EN-FINAL.pdf>

²¹ https://www.justice.gc.ca/eng/rp-pr/cj-jp/fv-vf/rr12_7/rr12_7.pdf

d) **Create, deliver and fund community-led public education campaigns on GBV, that highlight intimate partner and domestic violence.** Ensure these education efforts are multilingual and are paired with culturally appropriate support.

e) **Fund GBV-prevention programming for youth** like that operated by YWCA Cambridge, YWCA Sudbury and YWCA Muskoka, which have seen enormous success in increasing participants' understanding of bodily autonomy, healthy relationships and boundaries, and gendered stereotypes. Reaching youth of all genders - beginning in elementary school - during their most formative years, is critical. YWCAs know our programming works because, in Cambridge and Muskoka, for example, demand by school staff and administrators for in-school violence prevention programming has steadily increased since the pandemic wrought havoc on the mental health of youth and has led to increases in anti-social, abusive behaviour, especially GBV-related across all grade levels. We consistently hear from schools that our programming helps ameliorate these troubling trends.

f) In respecting efforts to ensure an intersectional approach is taken to address this violence, we echo the following recommendations from the Ontario Native Women's Association:

i) **Provide net new investment for community-based prevention and healing programs [for example, through Ontario's Pathways to Safety Strategy and Gender Based Violence Strategy (Ontario-STANDS) to support Indigenous-led solutions to IPV and family violence.** This includes targeted investment for family violence and IPV education and awareness led by Indigenous organizations, including Indigenous women's organizations, and communities.

ii) **All legislative, policy, program and service responses to IPV be reviewed by the Indigenous Women's Advisory Council using an Indigenous gender-based analysis lens to ensure the unique intersectionality of Indigenous women's experiences is accounted for, and to prioritize their specific safety needs.**

iii) **Invest in Indigenous women’s specific mental health and wellness programs.**

iv) **Invest in Indigenous community-based child welfare prevention programs delivered by Indigenous women’s organizations,** as Indigenous women are disproportionately impacted by child welfare agencies and little funding is provided to assist mothers involved with the child welfare system.

8 Ensure the Ontario action plan to end gender-based violence meaningfully addresses the GBV and IPV epidemic.

November 2023 saw a critical investment in the province’s efforts to end gender-based violence by signing the Canada-Ontario bilateral agreement on the National Action Plan (NAP) to end Gender-Based Violence (GBV). Now, the province has a critical role to play in ensuring the proposed National Action Plan will meaningfully address the GBV crisis. The commitment to stabilize and strengthen the sector, which has long been strained, is especially integral to our work and we look forward to seeing the continued rollout to ensure the \$162 million commitment by the province supports survivors, the sectors, and efforts to prevent further violence.

To further ensure that women, girls, and gender diverse people can lead lives free from violence and reach their full potential, we recommend your government:

a) **Ensure NAP investments prioritize existing core services (operating) and innovation (projects), along with measurable plans and strategies.** This requires community input and guidance from sector experts to ensure an intersectional and holistic lens.

b) **Take a multi-sectoral approach to addressing gender-based violence** across the province, including creating and implementing a province-wide strategy to end GBV.

c) **Reinstitute the provincial roundtable** to advise, inform, and monitor progress on the aforementioned strategy, ensuring the roundtable is informed and led by survivors and victims' families, service providers, and subject matter experts.

d) **Ensure all plans to address GBV are shaped by community input and guidance from GBV subject matter experts and consider the disparate experiences of violence encountered by Indigenous, Black, racialized and 2SLGBTQ+ women and gender diverse people and those living with disabilities.**

Conclusion



Conclusion

63 Women died by femicide in 2023, compared to 52 in 2022. As of July 2024, there have been 42 reported cases of femicide, an increase of four from July 2023 - clearly demonstrating the growing crisis. In their submission to the Standing Committee on Justice Policy, OAIH reports that, between 2019 and 2023, there have been 237 confirmed cases of femicide. These growing rates of recorded cases of femicide alone are a testament to the crisis we are facing today. There is no denying this epidemic is a public health crisis, and must be addressed as such, but we cannot change what we refuse to name. With this in mind **we recommend this government swiftly pass Bill 173 through third reading, granting it royal assent.** We also support the Ontario Native Women's Association's recommendation that "any provincial declaration around intimate partner violence and gender-based violence explicitly recognize the disproportionate rates of violence against Indigenous women and girls, their unique and intersectional experiences as Indigenous and as women, and the root causes of this violence."

We extend our gratitude to the members of the Standing Committee on Justice Policy for your attention to this epidemic and your commitment to finding solutions to intimate partner and gender-based violence.

We also thank the survivors who have participated in this review and shared their personal stories in the hopes of preventing further violence. It is our sincere hope that we can work together to honour them, as well as the countless other survivors and those silenced by femicide. It's time to act and make investments quickly and strategically.