

May 6, 2011

The Commission for the Review of Social Assistance in Ontario
2 Bloor Street West, Suite 400
Toronto, ON
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Dear Commissioners Lankin and Sheikh,

In November 2011, a group of women wrote to Minister Meilleur and Minister Broten encouraging them to ensure that Ontario's review of social assistance programs would be "guided by a gender and equity analysis". We enclose that letter for your information.

Since then, the original group of women reached out to others and on February 25 the YWCA, the Institute for Feminist Legal Studies (Osgoode Hall Law School) and the Income Security Advocacy Centre (ISAC) jointly hosted a forum on what a "gendered equity" review of social assistance might look like.

We are writing today to urge you to ensure that the following four key concerns guide the review process. These concerns reflect the variety of issues that were raised at our February forum. We also provide a discussion of the ways in which a number of critical issues for the Review could be addressed through the application of and attention to our key concerns. We look forward to the opportunity to discuss these concerns and their implications for policy further with you. We will close by indicating some other projects that we are exploring which are directly relevant to the Review.

1. A gendered equity perspective

A gendered equity perspective would recognize that gender and equity are central to questions of poverty, and thus must be central when creating social policy generally and benefit systems in particular. We use the phrase "gendered equity" consciously, to illustrate not only the importance of gender, but also that gender cannot be considered in isolation from other serious equality concerns. Some women – those who are part of racialized groups, are affected by various kinds of disability, are First Nations, Métis and Aboriginal, who have long family histories of poverty, and who are immigrants or newcomers to Canada – face different and more serious challenges. Attention to these differences is the only route to a just and fair social assistance system.

Applying a gendered equity perspective to the Review would, for example, respond to the increasing failure of social policy in Ontario to recognize the work of “social reproduction”. Many of the policies that our governments enact to ensure the well-being of society neither recognize nor support the vast amount of unpaid labour that occurs within the household and in community – the work of caring for children, families, households, and the elderly, whether within a person’s own family or in the larger community.

But even more problematic is that social policy – which often has the most impact on those in our society who live in poverty – ignores the reality that the work of social reproduction is undertaken primarily by women, despite the fact women are also important contributors to the paid workforce, and that women are disproportionately impacted by poverty.

Caregiving, child rearing, and other forms of communal support form the basis of our families and communities. As such, they also form the foundation of our ability as individuals to take on paid labour in the workforce. This labour pays our bills and supports our families but, just as important from a public policy perspective, also contributes to the growth and well-being of the society and economy that we are all part of. Social policy that ignores the importance of the work of social reproduction is therefore counterproductive to and can potentially undermine many of our larger social and economic goals.

Our call to ensure the Social Assistance Review takes a gendered equity approach is therefore a call to recognize, understand, and account for the complex realities of the lives of women so that our social assistance systems can more effectively support them in all the roles they perform. We urge the Commission to take a gendered equity perspective to its work in making recommendations on Ontario’s social assistance systems.

2. A strong evidence-based analysis

An evidence-based analysis is vital to ensure that social assistance policy addresses the actual situations and circumstances of the people it is trying to serve, rather than responding to assumptions and biases. While an ideological basis for policy obviously exists, attention to empirical evidence is critical to program design and cannot be overlooked. Where evidence is missing, it needs to be developed before policy decisions are made. And gender must be a central category used to gather and interpret that evidence.

In this context, evidence includes the vast amount of qualitative data available about the experiences of women living in poverty, statistics that have been or will be produced, the experiences of other jurisdictions, and the reports of experts in various fields.

Without evidence that recognizes the difference that gender makes, the Review will be hobbled. Without visible evidence to back up recommendations, and without some effort to grapple with the conflicting evidence which will inevitably arise, the Review will not meet expectations.

3. Poverty reduction

The social assistance Review arose in the context of the commitment that all parties in the legislature made to reduce poverty in Ontario. As such, the Review must treat the reduction of poverty as the ultimate goal for its recommendations for change.

This means that the Review must ensure adequacy of benefits – particularly in light of the importance of the work of social reproduction. In addition to recognizing the variety of roles that women play in the lives of their families, communities, and the economy, we believe that social assistance policy must take an approach that explicitly acknowledges the importance and the necessity for some women at some points in their lives either remaining unattached to the labour market or having minimal attachment in order to do the important work of social reproduction. The ability of women to seamlessly and reliably access adequate income support benefits is thus critical, as is ensuring that the combined total of all income benefits, which could well be delivered through a variety of programs, is adequate to support women and their families.

But the Review must ensure that programs and supports do not simply move people from a life of poverty due to insufficient benefits to poverty created and sustained by poorly paid, insecure jobs. Poverty is an individual, social, and economic harm that requires policy attention, and the intricacies and complexities of benefit program design should not serve as a way to deflect attention from the need to reduce poverty in Ontario.

4. Attention to implementation and access issues at the ground level

Participants at our February forum drew attention to the crucial role that implementation plays in the creation of any new policy or program, in that the goals of any social policy or program can easily be undermined depending on how it rolls out at ground level.

For example, one of the serious problems in Ontario's current social assistance programs is the contradiction between the number of benefits that are technically available through the programs, and the fact that many are practically unavailable at ground level for a variety of reasons – including the lack of information provided to people requiring benefits, numerous administrative disentitlement practices, and a variety of other barriers.

The Review must address this issue squarely by considering whether and how recipients can be assisted to obtain the full range of benefits to which they are entitled, rather than treating social assistance as a test of persistence and skill on the part of the recipient. The recommendations of the Review must address this point, so that we do not continue the practice of concealing and denying benefits to those who fit the legal or regulatory criteria for receipt, consigning them and their advocates to a counterproductive and exhausting struggle to obtain the benefits to which they are entitled.

These four key concerns should, in our view, guide both the process and substance of the Review. In our meetings, we noted a few of the ways in which our key concerns help identify issues that are critical for the Review to address:

Recognizing the complexity of the lives of women living in poverty

Women who live in poverty have many roles. They are mothers. They take care of parents. They are volunteers. They work in the paid labour market. They have the similar goals, dreams, responsibilities, and desires as other women – but in all cases, their lives are made more complex by the poverty they face. And yet the very income support systems that women and their families are often forced to rely on – Ontario Works or the Ontario Disability Support Program – often exacerbate, not simplify, that complexity.

Over the past twenty years, our income support programs have undergone an enormous change in the way they understand and support women’s roles. Under Family Benefits and the Mothers’ Allowance, women were recognized primarily as mothers, and their work as caregivers was supported by allowing women with children to collect income support benefits while being full-time mothers until their children reached age 18 (and in some instances, 21). Under Ontario Works and the Ontario Child Benefit, however, women with children are primarily understood as workers, with their child rearing and care giving responsibilities thought to end when their children are of school age.

Neither of these representations of women in income support policy effectively responds to the complex variety and mix of roles that women actually live. While government has begun to address the complexity of women’s lives – and the social costs that can result – in its focus on early learning and child care, it has not taken complexity into account in social assistance policy. But the costs associated can be just as debilitating to women.

Recognizing the connection between poverty and violence

Social assistance policy that takes a gendered equity approach would need to respond to the reality of violence in the lives of women, and particularly the impact of violence for poor women. Numerous studies have shown that poverty makes women vulnerable to violence, and that violence makes women vulnerable to poverty. Social assistance policy can and must be structured to promote women’s autonomy and security, assist women who are fleeing violence, and replace the current emphasis on surveillance of women living in poverty with an emphasis on support.

Recognizing the impact of how benefit units are defined and how benefits are delivered

Ontario’s current social assistance system regulates adult personal relationships and relationships between children and their parents, determining when a couple become “spouses” and thus financially interdependent, and when a parent’s financial responsibility for

their children begins and ends. Yet in other social policy realms – such as taxation and family law – “families” are regulated and “spouses” are defined quite differently. The inconsistencies among these different sites of regulation can and do have an enormously negative impact on women and their children. A Review that takes a gender equity perspective would have to both recognize and respond to these multiple and frequently inconsistent sites of regulation, and in particular consider the appropriate “benefit unit” for the purposes of the delivery of benefits.

Determining the appropriate benefit unit is of particular importance given the trend toward moving income delivery outside of the social assistance system. We note that the model used for the delivery of the Ontario Child Benefit is currently being advocated for a number of other benefits – and yet, the full impact of this policy shift on women and their children has not been determined. Examination of the advantages and disadvantages for women of delivering benefits through the income tax system is required, with careful consideration of a number of issues including (but not limited to) the definition of spouse, the impact of the Canada Revenue Agency’s appeal system, and the degree of flexibility and responsiveness within a system designed to collect revenues, rather than to deliver social programs.

Recognizing barriers to access: Training and education

Finally, our four key points illustrate the need to carefully analyze issues around training and education. The Review must consider the importance of ensuring access to high quality training and education opportunities, which is critical to improving the income security and well-being of women. But the provision of these opportunities must recognize a number of factors that act as barriers to opportunity for women. First, women face a number of challenges in accessing training and education due to their responsibilities in caring for family. Second, women who have experienced violence often require specific supports to help them negotiate their entry into the labour market, given that the workplace can be dangerous for women whose efforts to be self-sustaining are undermined by men in their lives, and given that women experiencing violence require particular social and emotional supports in order to meaningfully and fully participate in training and education opportunities. Third, training and education opportunities need to anticipate and respond to the challenges involved when women re-enter the labour market after having been absent from active participation – sometimes for many years – while raising children. And fourth, attention must be paid to the conditions within the labour market that serve as barriers to the full participation of women and to their ability to move out of poverty through work – including pervasive gender and race-based inequalities.

In addition, the Review must acknowledge that training and education – and, indeed, efforts to move into the labour market – may not be appropriate for all women receiving income support benefits. There are some women for whom training, education, and employment may not be of benefit, or may not be feasible. The system must be flexible enough to accommodate – and fully support – women in situations such as this.

Our Contribution and Future Activities

As a group, we represent considerable experience, expertise and insight into the way that receipt of social assistance benefits is gendered and occurs in a gendered and inequitable context. We are currently exploring the possibility of an expert forum in mid summer to consider gendered approaches to the question of delivery of benefits through the taxation system. We hope that if this project comes to fruition, you will consider attending, and we will keep you informed of our progress.

Thank you for your attention to our letter. We look forward to an opportunity to meet with you to discuss how to ensure that the Review process accounts for the ways that gender and other equity concerns condition the experience of poverty in Ontario and produces recommendations which will respond to the real experiences of Ontario women living in poverty. Please contact Lielle Gonsalves (Institute for Feminist Legal Studies Administrative Support) at lgonsalves@osgoode.yorku.ca in order to indicate your availability for such a meeting with some of the undersigned.

Sincerely,

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Encl 1: Letter to Meilleur and Broten, Nov 2010

November 15, 2010

The Honourable Minister Meilleur
Ministry of Community and Social Services
Hepburn Block, 6th Flr
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Toronto ON
M7A 1E9

Dear Minister Meilleur,

RE: GENDERING THE INCOME SECURITY REVIEW

Ontario's work on poverty reduction and income security over the last three years has been groundbreaking on many fronts.

The government's work to establish both short and long-term initiatives to reduce poverty as well as the commitment to create and evaluate these initiatives using timelines and targets is extremely important. Further, the government's inter-ministerial approach has been instrumental in beginning the critical process of integrating policy and program initiatives so that resources and impact can be maximized. And, of course, the investments made to date in meeting poverty reduction commitments are having positive impacts for children and their families around Ontario.

The recent work of the Social Assistance Review Advisory Council, which resulted in the *Recommendations for an Ontario Income Security Review*, is also of great importance. It is this work about which we are writing.

We were pleased with many of the Council's recommendations for a terms of reference to guide an income security review. However, we are concerned that the recommended terms of reference do not emphasize the importance that a gender and equity analysis will have to ensuring that reform of income security policy is effective.

Poverty is gendered and racialized. We have attached a one-page backgrounder that outlines just a few of the important recent statistics that demonstrate the inequitable reality that women and people in racialized groups face in terms of income, and both the individual and social consequences of this inequity.

Ontario's Poverty Reduction Act recognizes this inequity, affirming that "not all groups of people share the same level of risk of poverty." Therefore, the Act states that "the poverty reduction strategy must recognize the heightened risk among groups such as immigrants, women, single mothers, people with disabilities, aboriginal peoples and racialized groups."

As such, we are asking that you ensure that the work to reform Ontario's income security system is guided by a gender and equity analysis, and that the terms of reference for the Income Security Review include a commitment to conducting the review and analyzing the relevant policy using a gender and equity lens. Meaningful and effective reform can only be accomplished by addressing the reasons that cause women and racialized people to be more likely to experience poverty. Further, the different conditions faced by women must be considered, as well as the differential effects of policies and programs on women and men.

Poverty reduction strategies and income security reform initiatives should promote equality and equity. As such, the upcoming income security review must be given direction to consider the significance of gender and race.

We look forward to hearing from you and meeting to discuss our concerns in more detail.

On behalf of the signatories listed below,

Sarah Blackstock,
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Debbie Dougals,
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cc: The Honourable Minister Laurel Broten

Background: Poverty is gendered and racialized

In Canada:

- Women raising children on their own are almost five times more likely to be poor than two-parent families with children.
- The poverty rate of older women on their own is almost 13 times higher than for those living in families.
- Women who work full-time, year-round earn only 71 cents for every dollar earned by men.
- About 40% of employed women work in precarious jobs that are generally poorly paid with little or no job security and no benefits, such as pensions.
- Only 39% of unemployed women are receiving Employment Insurance (EI) benefits, compared with 45% of unemployed men.
- Women account for 60% of minimum wage workers.
- The low income rate for persons with severe and very severe disabilities is 27.5% for women and 16.4% for men. The low income rate for persons with mild and moderate disabilities is 16.7% for women and 15.9% for men. The low income rate for persons with no disabilities is 11.5% for women and 10.0% for men.

(Sources: Townson, M. 2009. *Women's Poverty and the Recession*. Canadian Centre for Policy Alternatives. Mendelson M., Battle K., Torjman S. and Lightman E. 2010. *A Basic Income Plan for Canadians with Severe Disabilities*, Caledon Institute.)

In Ontario:

- Racialized women make 53.4 cents for every dollar non-racialized men make and 84.7 cents for every dollar that non-racialized women make.
- 32% of children in racialized families and 47% of children in recent immigrant families live in poverty.
- The levels of poverty, the lack of access to paid employment and the quality of life for Aboriginal people in Ontario are dire. The colonial legacy combined with present-day systemic inequality and discrimination has impoverished and endangered Aboriginal women. In Ontario, 24% of Aboriginal women who are living with family are living in poverty; 50% of unattached Aboriginal women are living in poverty.
- In Toronto, ethno-racial minority families make up 37% of all families, but account for almost 60% of poor families.

(Sources: Block, S. 2010. *Ontario's Growing Gap: The role of race and gender*. Canadian Centre for Policy Alternatives. Colour of Poverty. *Understanding the Racialization of Poverty in Ontario*.; Statistics Canada. 2001 Census. Catalogue #97-F0011XCB2001046.)

And, because poverty has gendered consequences, it is an equality issue:

- Women lose autonomy in their relations with men. Low welfare rates coerce women into 'survival sex' or prostitution.
- Women living on inadequate welfare benefits live in unsafe housing, such as squats and shelters and are more vulnerable to rape and sexual harassment.
- Women receiving welfare are more likely to have their children apprehended, not because the children are mistreated, but because they cannot provide adequate housing and food.
- Women cannot leave abusive relationships because welfare rates are not sufficient to support them and their children. If they do leave, they often return for economic reasons, even when they are endangered.

(Source: Canadian Feminist Alliance for International Action. 2010. *No Action: No Progress*. Canadian Feminist Alliance for International Action Report on Canada's Progress in Implementing Priority Recommendations made by the United Nations Committee on the Elimination of Discrimination against Women in 2008. intraspec.ca/Report_NoActionNoProgressFAFIA_2010_2.pdf.)