Response to the National Housing Strategy

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About the OFIFC

Founded in 1971, the Ontario Federation of Indigenous Friendship Centres (OFIFC) works to support, advocate for, and build the capacity of member Friendship Centres across Ontario.

Emerging from a nation-wide, grass-roots movement dating back to the 1950’s, Friendship Centres are community hubs where Indigenous people living in towns, cities, and urban centres can access culturally based and culturally appropriate programs and services every day. Today, Friendship Centres are dynamic hubs of economic and social convergence that create space for Indigenous communities to thrive. Friendship Centres are idea incubators for young Indigenous people attaining their education and employment goals, they are sites of cultural resurgence for Indigenous families who want to raise their children to be proud of who they are, and they are safe havens for Indigenous community members requiring supports.

In Ontario more than 85 per cent of Indigenous people live in urban communities. The OFIFC is the largest urban Indigenous service network in the province supporting this vibrant, diverse, and quickly growing population through programs and initiatives that span justice, health, family support, long-term care, healing and wellness, employment and training, education, research, and more.

Friendship Centres receive their mandate from their communities, and they are inclusive of all Indigenous people – First Nation, Status/Non-Status, Métis, Inuit, and those who self-identify as Indigenous.

Learn more about the work the OFIFC does to support Friendship Centres at www.ofifc.org.
Ontario Friendship Centres

1 Red Lake Indian Friendship Centre 2 Ne-Chee Friendship Centre (Kenora) 3 Dryden Native Friendship Centre 4 Nishnawbe-Gamik Friendship Centre (Sioux Lookout) 5 United Native Friendship Centre (Fort Frances) 6 Atikokan Native Friendship Centre 7 Thunder Bay Indigenous Friendship Centre 8 Thunderbird Friendship Centre (Geraldton) 9 Timmins Native Friendship Centre Satellite Office (Moosonee) 10 Kapuskasing Indian Friendship Centre 11 Ininew Friendship Centre (Cochrane) 12 Timmins Native Friendship Centre 13 Indian Friendship Centre (Sault Ste. Marie) 14 N’Swakamok Native Friendship Centre (Sudbury) 15 North Bay Indigenous Friendship Centre 16 Odawa Native Friendship Centre (Ottawa) 17 Parry Sound Friendship Centre 18 Georgian Bay Native Friendship Centre (Midland) 19 M’Wikwedong Native Cultural Resource Centre (Owen Sound) 20 Barrie Native Friendship Centre 21 Nogojiwanong Friendship Centre (Peterborough) 22 Toronto Council Fire Native Cultural Centre 23 Peel Aboriginal Network (Mississauga) 24 Hamilton Regional Indian Centre 25 Niagara Regional Native Centre (Niagara-on-the-Lake) 26 Fort Erie Native Friendship Centre 27 N’Amerind Friendship Centre (London) 28 Sarnia-Lambton Native Friendship Centre 29 Can-Am Indian Friendship Centre of Windsor
Introduction

The OFIFC welcomes the federal government’s long awaited return to the national housing landscape with the release of the National Housing Strategy: “A Place to Call Home” (NHS). The recognition of housing as a human right is of particular significance to Indigenous people living in urban settings in Ontario, where racism impacts Indigenous people’s ability to access all types of housing on a daily basis. Disproportionately high rates of Indigenous homelessness in major urban settings across the country are a result of chronic underinvestment in social and affordable housing and the ongoing impacts of colonialism. It is imperative that the implementation of the NHS lead to reconciliation-based policy-solutions that are person-centered and co-developed in partnership with urban Indigenous communities and organisations.

This response will highlight some of the challenges, but also the specific successes of urban Indigenous housing and service infrastructure in Ontario in relation to the NHS. It will outline the importance of specific Articles of the United Nations Declaration on the Rights of Indigenous People (UNDRIP) and Calls to Action of the Truth and Reconciliation Commission’s (TRC) Final report. And lastly, this response is intended to contribute to the national policy discourse on housing and homelessness with particular emphasis on the unique urban Indigenous housing/homelessness context in Ontario.

The absence of any reference to urban Indigenous communities in the NHS constitutes a barrier to ensuring the needs of urban Indigenous people are rendered visible across government.

It is of critical importance that this context is understood across government, within the public service, and by national research bodies so that innovative, culture-based solutions to preventing and addressing Indigenous homelessness and housing inadequacy are made visible and recognized as integral to meeting the goals of the NHS. The absence of any reference to urban Indigenous communities in the NHS constitutes a barrier to ensuring the needs of urban Indigenous people are rendered visible across government. In Ontario, this omission represents 85 percent of total population of Indigenous people living off-reserve.
Key results from the 2016 Census

Approximately 319,970 or 85.5% of the Indigenous population in Ontario lives off-reserve. Census results indicate that the off-reserve population continues to grow in Ontario.

In Ontario, approximately 40.9% of the Indigenous population is under the age of 24.

The First Nations, Métis and Inuit populations continue to be significantly younger than the non-Indigenous population. Nationally, the average age of the Indigenous population was 32.1 years in 2016, which is almost a decade younger than the non-Indigenous population (40.9 years).

In 2006, 4.8% of the Aboriginal population was 65 years of age and older; by 2016, this proportion had risen to 7.3%. According to population projections, the proportion of the First Nations, Métis and Inuit populations 65 years of age and older could more than double by 2036.

History of Friendship Centres Advocacy: Housing and Homelessness

Following the intensification of Indigenous people’s migration to urban centres in the 1950s, Friendship Centres have organised to prevent and address Indigenous homelessness and housing inadequacy. Founded in 1964, a critical service of the Thunder Bay Indigenous Friendship Centre in its early days was, “advocacy to protect Aboriginal families from being exploited by landlords”.¹ Today, racism and discrimination in the private market remain significant issues for urban Indigenous individuals and families, impacting the wellbeing of whole communities. In fact, 17 per cent of respondents to the Urban Aboriginal Task Force reported being impacted by racism in the rental housing market.²

Friendship Centres’ ad hoc organising and advocacy has evolved into multi-level community and program-based interventions. These activities span involvement on municipal leadership tables, various forms of crisis intervention, and the direct provision of shelter services and social/affordable housing. Shelter and housing is delivered through partnerships with federal, provincial and municipal governments, and Ontario Aboriginal Housing Services (OAHS). Friendship Centres are recognized in Ontario as “the original Community Hubs”,³ experts at aligning multiple levels of funding to meet unmet areas of community-identified need.

Friendship Centres deliver shelter and/or housing services in the following locations:

- Ne-Chee Friendship Centre (Kenora);
- Sarnia-Lambton Native Friendship Centre;
- Dryden Native Friendship Centre (in development);
- Ininew Friendship Centre (Cochrane); and,
- Timmins Native Friendship Centre.

Four more Friendship Centres in Ontario are anticipated to become housing and/or shelter providers in 2018/19, bringing the total to nine, representing approximately one-third of all Friendship Centres in Ontario. Increased flexibility in various NHS programs, including existing operating agreements, will enable the fulfillment of wholistic, housing-based solutions to poverty and housing inadequacy, and must be coupled with sector-expansion to maintain pace with the growing urban Indigenous demographic.

Urban Indigenous Homeward Bound (UIHB) is one such initiative already underway in seven Friendship Centre communities. Developed with the leadership and support of WoodGreen Community Services, UIHB is a four-year culture-based education and employment program for Indigenous single mothers and their children who require longer-term, scaled interventions to break intergenerational cycles of poverty. The implementation of UIHB coordinates the provision of key community-based supports such as: housing, child care, and health care. It also requires direct partnerships with local industry leaders and post-secondary institutions to increase community capacity to work collaboratively and generate opportunities for Indigenous women to succeed in their education and careers. Integrated, culture-based initiatives like UIHB would benefit from increased inter-departmental collaboration and flexibility in federal-provincial agreements especially between Employment and Service Development Canada, the province, and OAHS.
Policy and Leadership Context

The OFIFC’s involvement in the social housing sector and social service sector is relevant to our response. The OFIFC is both a Director Member Organisation (DMO) of OAHS, the fifth largest social housing provider in Canada, and an umbrella organisation that administers over 30 unique programs and services to Friendship Centres including the Homelessness Partnering Strategy (HPS). The OFIFC is the only HPS Community Entity that is both Indigenous and provincial in scope. Our submission to Employment and Service Development Canada (ESDC) on the redevelopment and expansion of HPS outlined the importance of meaningful and collaborative engagement with urban Indigenous communities in real and practical terms. The OFIFC’s extensive knowledge base weaves together program development, culture-based evaluation, social housing governance, and social policy.

In terms of engagement on the NHS, in November of 2016 the OFIFC provided a submission to the Canadian Mortgage and Housing Corporation (CMHC) and related federal departments on the NHS pre-consultation, part of “Let’s Talk Housing”. The OFIFC also contributed its expertise to a National Roundtable Discussion and a National Stakeholder Discussion with the CMHC. Our executive leadership hosted separate discussions and submitted correspondence to elected officials involved in the development of the NHS and provided the following advice:

“Achieving the goals of the NHS will depend on strategic and deliberate engagement with Indigenous organisations, irrespective of jurisdiction. An effective engagement strategy is required to solicit proportionally representative feedback, both in terms of population demographics and rates of homelessness/housing need from organisations with a depth of understanding and demonstrated capacity to engage broadly on these issues, such as OAHS and its Director Member Organisations.”

The OFIFC’s extensive knowledge base weaves together program development, culture-based evaluation, social housing governance, and social policy.

4 OAHS manages over 1,900 deep core rent-g geared-to-income and affordable rental units, and administers new rental development, home repair, and home ownership programs. Over the past 9 years, our responsible and accountable delivery has helped develop 685 new rental units representing an investment of $84.9 million, repaired over 309 homes, and assisted 450 households move into home ownership. In total, our programs positively impact the lives of over 9,300 people each and every day. (Ontario Aboriginal Housing Services. (2017). Letter to Hon. Dr. Carolyn Bennett. December 1, 2017)

5 OFIFC. Correspondence to Minister Jean-Yves Duclos. June 5, 2017.
National venues are limited that permit Indigenous-led policy discussions on housing and homelessness. Fewer still that meaningfully account for urban Indigenous self-determination in the development of program or conference agendas. A generous interpretation would be that this lack of space reflects changes within government, as the Ministers of Indigenous Services and the Minister of Indigenous Affairs and Reconciliation consider the implications and scope of their relatively new mandates as well as how to engage with Employment and Service Development Canada. A less generous interpretation would be that the lack of space for urban Indigenous policy discourse reflects an ongoing lack of internal resolve and communication within federal departments, resulting in the exclusion of urban Indigenous perspectives.

At the National Conference to End Homelessness organised and hosted by the Canadian Alliance to End Homelessness, organisers worked with integrity to incorporate Indigenous knowledge throughout the four-day agenda. However, Indigenous-specific sessions focussed on program-delivery and/or “Indigenizing” existing policies developed in the mainstream. Any approach to ending Indigenous homelessness and housing inadequacy should “engage Indigenous processes, since according to our traditions, the processes of engagement highly influence the outcome of the engagement itself”. While international comparators and successes are important to understand and study (i.e. Wales, Finland, and England) they are secondary to understanding and upholding the principles of reconciliation in urban Indigenous communities. The OFIFC is aware that knowledge generated through the National Conference percolates through government and still excludes urban Indigenous policy perspectives.

6 Simpson self-identifies relationally and culturally as part of the Kina Gchi Nishnaabeg-agaming Nation and as a contemporary Michi Saagiig Nishnaabeg woman (14-15).

In 1982 when the [Migrating Native Peoples Program] was renewed, we set out as the fundamental policy principle the idea of urban Aboriginal institutions as legitimate institutions in their own right that would not have to justify their existence on a yearly basis. We established the idea that there were urban Aboriginal communities with institutions developed by community members to serve our own needs.

**We argued for urban Aboriginal peoples and institutions to be seen as a legitimate part of the urban landscape.** It was a tough sell. Institutions meant that Aboriginal peoples were planning on living in cities permanently. How could we know this since we had only recently migrated to them? The linking of Aboriginal peoples and ruralness was and still is firmly entrenched in Canadian social consciousness: Indians live on reserves not in cities. I keep asking, who says so?

Self-Determination and Prosperity

The identification of Indigenous peoples as “vulnerable” in the NHS is a double-edged sword. On the one hand, this designation reflects the real-life circumstances of many Indigenous people and will result in targeted investments that could support the efforts of our communities to address poverty. On the other hand, it does not recognise the strength, diversity, and resilience of our communities, institutions, and infrastructure. Indigenous people are not inherently vulnerable; Vulnerability exists in Indigenous communities as a result of colonial policies aimed at destroying the fabric of Indigenous families and culture. Leadership is required at the federal level to identify internal structural and systemic barriers impacting urban Indigenous people’s wellbeing especially in the areas of justice and child welfare.

Friendship Centre communities have asserted that prosperity exists when community members have access to resources and supports that are based on culturally relevant and community-defined determinants of health. In framing this response, the OFIFC offers a wholistic vision of prosperity developed in consultation with Friendship Centre communities in Ontario. Core elements of prosperity that feed into a wider taxonomy of community-defined health measures include:

- Housing for all that is affordable, safe, and close to the community;
- Traditional food that fills you physically and spiritually;
- Cultural ways of living including supports, and resources;
- Urban Indigenous community self-determination;
- Access to opportunities including education, training, and community-based learning;
- Clean water and healthy lands;
- Urban Indigenous community infrastructure; and,
- Personal and community safety.  

Friendship Centres also note that community prosperity will be enhanced through the community-determined and culturally relevant implementation and evaluation of these measures. As such, the government should make space for Indigenous approaches to collecting and measuring this data through its National Housing Strategy Research Agenda to ensure it is useful, accessible, self-voiced, and grounded in communities’ context and relations. The OFIFC’s USAI Research Framework is an essential tool that facilitates community-driven processes and which has guided Friendship Centre communities’ prosperity research and metric-setting development.

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Implementation of the National Housing Strategy

HUMAN RIGHTS

High rates of Indigenous homelessness in urban settings require structural and legislative changes that support existing community-based prevention efforts. The NHS acknowledges that access to housing is a human right – part of the 1948 Universal Declaration of Human Rights and the 1966 International Covenant on Economic, Social and Cultural Rights. The introduction of new legislation, following a period of consultation, will enshrine this rights-based approach and will require subsequent federal governments to maintain a National Housing Strategy. The OFIFC anticipates that legislative consultation will be tightly controlled process – the government’s interest will be to manage risk while simultaneously increasing their responsibility.

The NHS “checks many of the boxes” that indicate the federal government is serious about a human rights-based approach to housing. These indicators include reference to conditions of adequacy, which according to the UN includes affordability, availability of services, and respect for cultural identity. Consistent with Article 23 of UNDRIP, it is the position of OAHS and its Directors that Indigenous housing should be designed, constructed, and delivered by Indigenous communities and organisations themselves in order to generate the best possible outcomes for urban Indigenous people. Furthermore, **OUR Framework** asserts that culture is an integral foundation of Indigenous wellbeing. Respect for cultural identity in housing should be included in proposed legislation that enshrines access to housing as a human right, in consultation with urban Indigenous communities.

Indigenous housing should be designed, constructed, and delivered by Indigenous communities and organisations themselves in order to generate the best possible outcomes for urban Indigenous people.

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11 Ibid. (3)


13 Ibid. (9)
PORTABLE BENEFITS

Increasingly, governments are turning to market-based measures to hedge against the rising cost of rental housing. Portable benefits, such as the Canada Housing Benefit announced as part of the NHS, are posed as solutions to decades-long chronic underinvestment in sustainable, social housing infrastructure. Market-based measures rarely include Indigenous perspectives on community development and social responsibility. While the OFIFC unequivocally supports anti-poverty measures that increase choice in housing, especially for victims of domestic violence and human trafficking, portable benefits do nothing to impact systemic barriers to housing access such as racism, which is “an affront to self-determination”.

If portable benefits are to improve housing-related outcomes for Indigenous citizens, they must be delivered alongside comprehensive equality and accountability measures. The NHS commitment to develop a national campaign to reduce stigma in housing is an important component of the government’s responsibility to address racism and discrimination in housing. Any public awareness campaign should include a lens on anti-Indigenous racism in market rent housing and align with increased funding outside of government for Indigenous-led research in this area.

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The OFIFC recognizes that the implementation of the Canada Housing Benefit will not be the same across the country – accounting for local conditions and service infrastructure. That said, to align portable benefits with a human rights-based approach, the following principles should be implemented within a National framework:

- Identity-based measurement and evaluation: Tracking Indigenous identity data should be a non-negotiable component of federal-provincial agreements in order to evaluate the impacts of the benefit on Indigenous people;
- Proportionality: Indigenous people should have equitable, barrier-free access to the benefit at a rate proportional to Indigenous population demographics and known rates of Indigenous homelessness and as such, specific targets should be established;
- Recognition of Indigenous infrastructure: Where applicable, the benefit should be offered equally to community members on Indigenous housing waitlists as it is to mainstream housing waitlists;
- Portability: Recognizing “high levels of residential movement”, in- and-out migration between communities leading to “substantial population turnover,” the benefit should ensure portability across municipal and provincial jurisdictions.

Responsive and evidence-based delivery notwithstanding, a planned two-thirds reduction in Investment in Affordable Housing (IAH) with redirection to the Canada Housing Benefit, underscores our broader concerns with portable benefits. As a policy and program direction, portable benefits do not address long-term underinvestment in social housing, greatly needed in communities with major supply pressures and for community members who experience multiple barriers to housing access. The federal government should work with the provinces and territories to account for communities where supply pressures will infringe upon the relative success of the Canada Housing Benefit.

FEDERAL LANDS
More Friendship Centres would deliver social-supportive housing if not for the high cost of capital and lack of suitable property in southern Ontario. The NHS initiative to make federal lands available for social and affordable housing could offset this challenge but only if urban Indigenous-led approaches to preventing/addressing homelessness (such as UIHB) are recognized for their innovation within federal departments and agencies. Again, the lack of any mention of urban Indigenous communities in the NHS is a significant obstacle to ensuring this knowledge translates across government, throughout the public service, and within national research bodies studying housing and homelessness.

MEASURING IMPACT: HOMELESSNESS TARGETS
An initial analysis of the government’s homelessness targets present some cause for concern. The measure of chronically homeless individuals proposed by the government will likely draw from the Homeless Individuals and Families Information System (HIFIS), used by shelters to track people and the services they receive.

Targeting a “50 percent reduction in the estimated number of chronically homeless shelter users” (6) may not significantly or proportionally impact Indigenous people experiencing homelessness in urban settings as Indigenous people are less likely to access mainstream shelters and more likely to be a part of hidden homeless populations.20 Furthermore, established targets may not adequately address the needs of youth, LGBTQ2S persons, and women fleeing violence who are more likely to experience other intersectional barriers that prevent or preclude them from accessing mainstream shelters when trying to break out of cycles of poverty and homelessness. If the government is seeking to apply a Gender Based Analysis to the National Housing Strategy, rates of shelter use alone is not a suitable metric to measure progress.

The lack of any mention of urban Indigenous communities in the NHS is a significant obstacle to ensuring this knowledge translates across government, throughout the public service.

**UNDRIP and the TRC**

The time to speak about the TRC and UNDRIP in general terms has passed. In implementation, NHS programs and services should align with Article 23 of UNDRIP, which states:

> “Indigenous people have the right to determine and develop priorities and strategies for exercising their right to development. In particular, indigenous peoples have the right to be actively involved in developing and determining health, housing and other economic and social programmes affecting them and, as far as possible, to administer such programmes through their own institutions.”

The declaration asserts that self-determination, in the manner described above, will enable Indigenous people to “maintain and strengthen their institutions, cultures, and traditions.”

In order to improve housing-related outcomes in urban Indigenous communities, the OFIFC reasserts that a National Urban Indigenous Housing Strategy is required to ensure an evidence-based and person-centered approach. The development of a specific urban Indigenous stream should not have the effect of sidelining urban Indigenous input on the NHS or take away from other Indigenous strategies in development.

Furthermore, reconciliation with Indigenous people has real meaning and implications for the NHS that are specific (in terms of the 94 Calls to Action of the TRC), comprehensive (in terms of creating space within institutions for Indigenous self-determination), and relationship-based. In the OFIFC’s submission to “Let’s Talk Housing” we identified several Calls to Action in the areas of Justice and Child Welfare that if addressed would make a significant positive impact on Indigenous homelessness and housing inadequacy in urban settings. These include, but are not limited to:

1. Reducing the number of Aboriginal children in care by providing adequate resources to enable Aboriginal communities and child-welfare organizations to keep Aboriginal families together where it is safe to do so, and to keep children in culturally appropriate environments, regardless of where they reside;

   • The reduction of stress and related adverse health outcomes through greater residential stability also has implications for child welfare issues and reducing the number of children in care;

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18 Ibid. 2

In order to address the jurisdictional disputes concerning Aboriginal people who do not reside on reserves, recognize, respect, and address the distinct health needs of the Métis, Inuit, and off-reserve Aboriginal peoples;

- Federal-provincial coordination is needed to ensure Indigenous people leaving institutional settings do no become homeless due to jurisdictional disputes. This has urgent implications for First Nations community members paroled from federal institutions to urban centres;

Commit to eliminating the overrepresentation of Aboriginal people in custody over the next decade;

- Friendship Centres and many other advocacy bodies have identified that adequate housing is key to ending cycles of incarceration;

Provide more supports for Aboriginal programming in halfway houses and parole services;

- Community members leaving institutional settings are vulnerable to homelessness, transitional supports will alleviate this vulnerability;

Commit to eliminating the overrepresentation of Aboriginal youth in custody over the next decade;

- Transitional housing that respects and supports Indigenous cultural identity is key to ending cycles of incarceration and poverty for youth.

As part of developing a National Urban Indigenous Housing Strategy, responsible departments and agencies should adopt a strategic approach to fulfilling specific Calls to Action. While the Calls to Action listed above are perhaps the most obvious in terms of addressing and preventing Indigenous homelessness and housing inadequacy, a strategic approach will require further consultation with urban Indigenous communities and organisations. Furthermore, identifying specific Calls to Action should result in targeted investments in partnership with the provinces, territories, and urban Indigenous organisations and housing providers. A grounding in the principles of the TRC, as well as UNDRIP is required in order to achieve transformative social change, especially in institutional settings, and to measure our collective progress in fulfilling the Calls to Action of the TRC.
“If reconciliation is focussed on residential schools rather than the broader set of relationships that generated policies, legislation and practices aimed at assimilation and political genocide, then there is a risk that reconciliation will “level the playing field” in the eyes of Canadians. In the eyes of liberalism, the historical “wrong” has now been “righted” and further transformation is not needed, since the historic situation has been remedied. I worry that the historical context for contemporary Indigenous-state contention becomes co-opted in this model, because the perception of most Canadians is that post-reconciliation, Indigenous Peoples no longer have a legitimate source of contention... Are we participating in a process that allows the state to co-opt the individual and collective pain and suffering of our people, while also criminalizing the inter-generational impacts of residential schools and ignoring the larger neo-assimilation project to which our children are now subjected?”

Definition of Indigenous Homelessness

Though not part of the NHS, Jesse Thistle’s contribution, *An Indigenous Definition of Homelessness in Canada* to the national discourse is also significant and reflects substantial and diverse Indigenous input. Furthermore, it is the first undertaking of its kind that is Indigenous-driven and voiced. The application of this knowledge in multiple community contexts, including urban Indigenous, with varying levels of infrastructure and developed capacity requires careful consideration.

Based on the extensive experience of Friendship Centres, and understanding that *An Indigenous Definition of Homelessness in Canada* is a living document, the dimension, “Escaping or Evading Harm Homelessness” does not reflect the substantial relationship between all forms of violence, including gender-based violence, and Indigenous homelessness. Any analysis of violence against Indigenous women, youth and LGBTQ2S persons is remiss not to identify the connection to imperialist and religious doctrines and ideologies resulting in attacks on non-male forms of leadership and the subjugation of women and non-binary people in relation to colonial institutions. In urban settings, the impacts of violence and/or escaping violence play a much larger role than indicated, proportionally, in the analysis section of *An Indigenous Definition of Homelessness in Canada*.

In Ontario, many of the wholistic concepts of home discussed in *An Indigenous Definition of Homelessness in Canada* such as membership and relationality have been woven throughout the provincial Indigenous Housing Strategy based on input from the Indigenous partners. Indigenous concepts of home and trauma-informed service delivery are identified in *OUR Framework* as foundational to Indigenous housing delivery in Ontario and are embedded within the governance and operations of OAHS. *An Indigenous Definition of Homelessness in Canada* will support continued improvements to develop a more effective Indigenous housing sector that is responsive to all forms of Indigenous homelessness.

The application of this knowledge in multiple community contexts, including urban Indigenous, with varying levels of infrastructure and developed capacity requires careful consideration.
Conclusion

While the OFIFC continues to consider the implications of the NHS and the *Indigenous Definition of Homelessness in Canada* we also assert that too often complexity is used as an excuse for inaction. Innovative culture-based solutions exist in our communities now. Our communities are poised to mobilize these solutions in conjunction with developing policies and strategies that speak to urban Indigenous perspectives and experiences of homelessness and housing inadequacy. A challenge for government is to recognize the value of urban Indigenous community-based responses to the housing and homelessness crisis and to develop effective internal mechanisms to coordinate multi-departmental and multilateral support. As such, the OFIFC re-affirms our call for a National Urban Indigenous Housing Strategy that is person-centered and evidence-based.
Recommendations

THAT THE FEDERAL GOVERNMENT

1. Develop a National Urban Indigenous Housing Strategy in partnership with urban Indigenous housing service providers and organisations with demonstrated capacity to engage in strategic policy development;

2. Determine a staggered and strategic approach to fulfilling specific “Calls to Action” of the TRC in relation to the NHS and a National Urban Indigenous Housing Strategy;

3. Ensure the National Housing Strategy Research Agenda includes a specific focus on urban Indigenous homelessness and that this research is led by urban Indigenous communities.

4. In implementing the NHS, adopt the principles of proportionality, identity-based measurement and evaluation, and recognition of Indigenous infrastructure.

THAT NATIONAL RESEARCH AND ADVOCACY BODIES

5. Develop an understanding of urban Indigenous housing and service infrastructure and policy development before advancing non-Indigenous programs and priorities within Indigenous communities;

6. Engage urban Indigenous organisations that operate in policy fora in advance of developing national conference agendas that include a focus on Indigenous homelessness.