



Supporting and Addressing the Student Housing Experience

3/30/22

SUPPORTING AND ADDRESSING THE STUDENT HOUSING EXPERIENCE ///

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EXECUTIVE SUMMARY

Conestoga Students Incorporated's (CSI) mission is "To enhance student satisfaction and success by providing a variety of student services at a cost justified by the results." This includes providing services, supports, resources, and ensuring the student voice is heard and represented.

Over the last few years, students have continuously expressed the need for improved housing support, which has been compounded by the broader Canadian housing affordability and supply crisis. The CSI Board of Directors recognized this call for action and tasked their Advocacy Team to begin an in-depth, year-long exploration of the issues currently impacting the student housing experience, conduct an environmental scan of housing programs and initiatives supporting students, and develop recommendations to address the issues identified.

The lived housing experiences of students directly impact their overall student experience, including their academic performance, health and wellness, and finances. This was reinforced heavily throughout the consultations of this project and is a driving force behind the recommendations.

The following themes and accompanying recommendations represent innovative, evidence-based solutions, and tangible actions that should be considered to address the housing crisis that has become a prominent barrier in the student housing experience.

DISCLAIMER: The following suggested recommendations are for the consideration of CSI's Executive Team and/or Board of Directors. These recommendations are not guaranteed to be adopted and/or implemented by CSI. An individual or collective action plan (such as CSI's Strategic Plan) will be created and published in the future which may or may not include these suggested recommendations.

THEME 1: ABSENCE OF RELIABLE HOUSING INFORMATION & RESOURCES & UNSAFE HOUSING CONDITIONS

A common issue identified across the Conestoga student population was the general lack of awareness of sources of reliable housing information to assist them in their housing experience, both institutionally and from local governing bodies. The problem of students' unfamiliarity with the resources and information available to them on their housing search¹ and their rights and responsibilities as tenants often leads to several students finding themselves in unsafe housing conditions through no fault of their own.

¹ Anonymous, Housing Focus Group: Conestoga Students Attending Cambridge Campuses, Zoom Meeting, September 29, 2021.

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Students also cited several external restraints, such as a lack of credit guarantors available to international students without an existing credit history², exasperating an already desperate dash to find accommodations in a constrained and expensive housing market. To resolve the abundant issues of unreliable housing information and unsafe housing conditions, CSI recommends:

RECOMMENDATIONS:

1. CSI should work with local municipalities to establish connections with tenants to provide ongoing education through:
 - a. Door-to-door campaigns
 - b. Community engagement events
 - c. Online community groups/forums
 - d. Workshops
2. CSI should advocate for the creation or translation of existing tenant educational resources, available in regions and municipalities where Conestoga campuses reside, to common languages of international newcomers to ensure students and more broadly, new community members, are not left without the tools and resources for safe housing.
3. CSI should advocate that Conestoga College provide comprehensive housing services with the following programs. If Conestoga College fails to develop these programs, CSI should explore introducing the following:
 - a. Expand the existing housing support services available to international students attending Conestoga College to include the domestic student population.
 - b. An institution-sponsored listing service, including landlord verification and 3rd party listings, like those available from Brock University's off-campus housing resource page and Queen's University's Landlord contract program.
 - c. Housing mediation services to assist landlords and tenants in amicable solutions to housing disputes before resorting to the Landlord Tenant Board or other legal action. An existing program facilitated in collaboration between the University of Western Ontario, Fanshawe College, and the City of London is a good example.
 - d. A roommate matching service to assist students in finding roommates with similar interests, hobbies, and backgrounds. The Find a Roommate program at the University of Toronto is an excellent example of an existing program.
 - e. Peer-to-peer housing supports that include a mediated online message board (Quora by Conestoga).

² Anonymous, Housing Focus Group: Conestoga Students Attending Waterloo Campuses, Zoom Meeting, October 5, 2021.

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- f. Interactive housing and scam prevention education modules that are available at all times in a centralized online location.
 - g. A comprehensive off-campus living transition program similar to Wilfrid Laurier University's LOCUS program, that includes off-campus community advisors and step-by-step aid for transitioning into private market housing for students who are:
 - a. Incoming students living off-campus
 - b. Students who previously lived in on-campus residence
 - h. An off-campus student housing newsletter to keep students aware of common issues and newsworthy changes in the private rental market, as well as news on campus.
 - i. Education for landlords on student-specific issues similar to the University of Western Ontario's Off-Campus newsletter.
 - j. Lease and rental agreement reviews for students who will be renting to ensure students understand their responsibilities of their lease agreement and are not signing non-standard or illegal leases.
 - k. Housing fairs to bridge connections and establish positive relationships between landlords and students.
4. CSI should advocate for the creation of a Housing Services Student Advisory Committee for students to provide CSI and Conestoga College with advice about programming, services, policies, and initiatives for student housing.
 5. CSI and/or Conestoga College should explore the possibility of arranging short-term temporary housing.
 - a. This program could include the creation of a joint emergency housing fund that provides up to 7 days of emergency housing for students in desperate housing need.
 6. CSI should explore the potential of being a guarantor for students who do not have access to one during their housing search.
 7. CSI should advocate that international recruiters contracted by Conestoga College provide students with accurate appraisals of the costs of living in Conestoga campus communities, ensuring students are prepared for their student experience expenses before arriving in the country. Per the 3rd recommendation of the report of the Auditor General of Ontario on Public Colleges, CSI should advocate for the Ministry of Colleges and Universities to:
 - a. "confirm that public colleges have a formal policy for the selection and removal of international student recruitment agencies;
 - b. require public colleges to monitor the agencies' advertisements at a regular interval (between three and six months) to confirm they are factually correct, and that any errors or other misleading advertisements found are corrected in a timely manner; and

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- c. collect data related to fees paid to recruitment agencies, and assess the reasonableness of the fees paid on a per-student basis.”
8. CSI should advocate for the province to expand the Residential Tenancies Act to include room renters in the protections provided to tenants.
9. In the absence of provincial protections for tenants in room rentals and shared accommodations with their landlords, CSI should explore the opportunity to facilitate a room rental program similar to Homestay. This program would provide protections to students renting rooms in Conestoga communities and from faculty and staff employed by Conestoga College.
10. CSI should create a drafted contract/lease form that tenants could use to ensure their room rental affords them protections not offered by the province. Queens University offers a Roomers and Boarders agreement that could be emulated.
11. CSI should determine if the CSI Legal Protection Program provides support for students not covered by the Residential Tenancies Act (room rentals or shared accommodations) and, if it does not, advocate to StudentCare for the inclusion of such housing-related coverage for room rentals.
12. CSI should advocate for Landlord Tenant Board (LTB) fees to be waived for low-income tenants’ LTB filings.
13. CSI should explore providing grants to students who need to file with the LTB if the CSI Legal Protection Program does not cover their case, until fees are waived for low-income tenants.
14. CSI should advocate that Conestoga College campus municipalities adopt a comprehensive rental licensing program that includes:
 - a. A pre-emptive and intermittent/randomized inspection program, with an incentive structure attached to landlords who successfully pass several inspections in a row.
 - b. An anonymous complaint structure that triggers inspections (anonymous complaints must be tied to a program with random reviews).
 - c. Incentives: these can include a reduced licensing fee for landlords or licensing fees waived for periods (renew license bi-annually as opposed to annually).
 - d. An educational program geared towards tenants to ensure they are aware of standard rental unit issues and their rights and responsibilities.
 - e. Measures to ensure the program is revenue neutral; this is to ensure all costs are justified through the actions of the bylaw staff, and the program maintains an image of fairness amongst property owners.

- f. A comprehensive license suspension process that protects tenants in the act of license revocation through constant updates with tenants in “at-risk” buildings and transition housing provided to tenants in suspended units.
15. As a secondary solution to Recommendation 14, CSI should advocate for a landlord/unit registry and certification program, similar to the Landlord Certification program introduced in Montreal.
16. CSI should explore the creation of a property management division of CSSI, similar to the program modelled by the Bristol Students Union’s Letting Program that puts the management of community properties into the hands of the student association to ensure housing is safe, accessible, and tenants are treated properly.
17. CSI should explore introducing a partnership with insurance companies to provide tenant insurance discounts for Conestoga students.

THEME 2: HOUSING UNAVAILABILITY

Through student consultations, students repeatedly recounted confronting the sobering reality that accommodations in their respective campus communities were unavailable. Students often shared their experience living and working in one community, often in the GTA, and attending class in another³.

Some of this can be attributed to the realities of a remote learning environment; nonetheless, students were adamant they had attempted to find accommodations close to campus, to no avail. For those students who could find lodging in campus communities, these accommodations were often unsafe, crowded, and illegal.⁴ Low vacancy rates in the private rental market, accompanied by either limited (for students at Conestoga’s Doon or Cambridge campus) or non-existent on-campus housing, have left students spreading their housing search far beyond their campus community. To help resolve the issue of housing unavailability, CSI recommends:

RECOMMENDATIONS:

18. CSI should advocate to the provincial government for funding for not-for-profits or post-secondary institutions to build culturally appropriate and diverse types of Purpose-Built Student Accommodations (PBSA) offered at below-market rates.
- a. PBSAs need to reflect the growing diversity of student populations, including growing numbers of international students, mature students, and other diverse student groups.

³ Anonymous, Housing Focus Group: Conestoga Students Attending Downtown Kitchener Campuses, Zoom Meeting, October 7, 2021.

⁴ Anonymous, Housing Focus Group: Conestoga Students Attending Waterloo Campuses.

- b. To facilitate PSIs building of on-campus student accommodations, CSI should advocate for the Ontario government to introduce a similar program to the British Columbia Student Housing Fund.
 - c. To ensure PSIs receive the proper funding to accommodate growing student populations and provide the housing student populations need, CSI should continue to advocate for increased provincial and federal funding for post-secondary education. CSI should advocate for the Ontario government to return to a publicly funded college model versus an overly reliant model on student-financed tuition.
 - i. This advocacy includes making specific asks of the government to adjust funding levels. CSI should advocate for the Ontario government to return FTE domestic student funding for colleges to the tuition to grant funding ratios seen in the early 2000s, wherein the province accounted for 65% of college revenues and tie this funding to inflation.
19. CSI should advocate for regional governments where Conestoga campuses reside to set aside a portion of their affordable housing stock for student tenants. A similar program is currently operating with City Housing Hamilton, Hamilton's social housing corporation. The 191 Main Street West, Hamilton property operated by City Housing is:
- a. Social housing available for students,
 - b. Owned and operated by the City of Hamilton,
 - c. All self-contained bachelor units inclusive of heat/hydro,
 - d. Must be a full-time student at Mohawk College or McMaster University.
20. CSI should explore innovative and emerging housing models for developing long-term affordable and sustainable PBSAs for Conestoga students present and future through partnerships with not-for-profit housing suppliers such as HOUSE.
- a. CSI should explore hiring HOUSE's team as a consultant to examine the possibility of providing PBSAs.
21. CSI should advocate for lodging homes to be expanded as of right in all Conestoga campus communities, to expand the available housing options for students, and ensure students have access to safe, affordable accommodations.
22. CSI should advocate for municipal governments to permit the building of secondary units on existing single-family residential zoned properties; the City of Kitchener's Backyard Homes and Tiny Houses zoning bylaw is an excellent example for other municipalities to mirror.

THEME 3: HOUSING UNAFFORDABILITY

Perhaps no problem is more pressing to students in their housing search than the *unaffordability* of their housing. Rental prices have risen dramatically over the past decade,

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vastly outpacing the growth rate for wages, leaving residents without the means to afford these price hikes.⁵ Students are incredibly aware of this problem and are experiencing this affordability crisis firsthand. According to the CSI Year-End Survey issued to Conestoga students:

- 5.81% of students surveyed do not currently have a stable place to live,
- The price of rent is the most critical factor for students in seeking accommodations (74.44% rated as extremely important),
 - Rent price is the primary factor in their housing experience students are most likely to express dissatisfaction (20.85% expressed disappointment),
- Students live with increasing numbers of roommates, with nearly 40% of students sharing what would otherwise be private accommodations (room) with other students. This is expressly against students' stated desire to be living in private accommodations.⁶

Students are increasingly accepting sub-standard living conditions, as it's perceived as a necessary trade-off to secure housing. As prices continue to climb unabated, students are left with no reasonable housing accommodations and many bad choices. To help resolve the problem of housing unaffordability, CSI recommends:

RECOMMENDATIONS:

23. CSI should advocate for the introduction of student housing financial supports; potential options include:

- a. Financial support akin to the program present at the University of British Columbia. The UBC program requires students to be full-time and receive the maximum government funding available through Canada Student Grants and Loans.⁷
 - a. Students at UBC are eligible to receive a total of funding of up to \$2200 when in UBC-managed housing.⁸ CSI supports an equivalent amount of funding to Conestoga students eligible for this program, absent the requirement for tenancy in institutional housing.
 - b. CSI should advocate for a program with no citizenship requirement, and therefore international students in demonstrated financial need should be eligible.

⁵ Spencer Turcotte et al., "It Is High': Kitchener Rental Prices Outpacing Average Income, Officials Say," Kitchener, August 27, 2021, <https://kitchener.ctvnews.ca/it-is-high-kitchener-rental-prices-outpacing-average-income-officials-say-1.5564155>.

⁶ Conestoga Students Inc., "CSI Year End Survey: Your Feedback, Your Experience, Our Priorities," Survey Report (Conestoga Students Incorporated, n.d.), <https://conestogastudents.com/wp-content/uploads/2022/02/CSI-Year-End-Report-Final-2021.pdf>; Conestoga Students Inc., "UTILE 2021 Flash Housing Survey," Unpublished Report (Conestoga Students Incorporated, n.d.).

⁷ "Student Housing Supplement Grant," Student Services, December 14, 2016, <https://students.ubc.ca/enrolment/finances/awards-scholarships-bursaries/ubc-bursary-program/student-housing-supplement-grant>.

⁸ "Student Housing Supplement Grant."

c.CSI should advocate for a program that requires students' full-time studies to extend longer than two terms or eight months.

24.CSI should advocate for the removal of vacancy decontrol in the province of Ontario through proposed legislation or potential new legislation to help address the rising cost of rental housing.

25.CSI should explore the creation of a Conestoga Students Incorporated Rent Bank

- a. Such programs already exist in municipalities across Ontario; however, none target a student population.
- b. A rent bank operation would see CSI provide funds to eligible Conestoga students who are behind on their rent or need help with a rental deposit. CSI ensures that at-risk students have the support they need to stay in their homes and prevent homelessness by providing these funds.

26.CSI should advocate that Conestoga College reduce the average rent for on-campus residence to 20% below the market rate to ensure students have affordable on-campus housing options.

Together, these recommendations have the ability to positively influence the student housing experience by ensuring access to appropriate housing supports, increasing the availability of housing, and improving the affordability of housing.





INTRODUCTION

An essential component of the student experience is housing. The lived housing experiences of students directly impact their overall student experience, including their academic performance, health and wellness, and finances.

Conestoga Students Incorporated’s (CSI) mission is “To enhance student satisfaction and success by providing a variety of student services at a cost justified by the results.” This includes providing services, supports, resources, and ensuring the student voice is heard and represented. CSI and Conestoga College have historically provided limited housing supports and resources as a key component of the student experience.

Over the last few years, students have continuously expressed the need for improved housing supports, which has been compounded by the broader Canadian housing affordability and supply crisis. The CSI Board of Directors recognized this call for action and tasked their Advocacy team to begin an in-depth, year-long exploration of the issues currently impacting the student housing experience, conduct an environmental scan of housing programs and initiatives supporting students, and develop recommendations to address the issues identified.

CSI’s advocacy work is guided by four broad-based principles: Accountability, Affordability, Equity, and Sustainability. For this report, these principles have been applied to housing in the following manner.

 <p>Accountability</p> <ul style="list-style-type: none">• Conestoga students expect that their institution and local community provides the basic necessities to succeed in their educational experience, including the provision of housing supports, resources, and initiatives.	 <p>Affordability</p> <ul style="list-style-type: none">• Conestoga students should not have to leverage their futures, take on larger debts, or suffer from housing instability due to unaffordability.	 <p>Equity</p> <ul style="list-style-type: none">• Conestoga students of varying backgrounds, lived experiences, and cultures have a right to housing. Students should not have to worry about discrimination in their housing, whether that be in finding accommodations or in their living situations.	 <p>Sustainability</p> <ul style="list-style-type: none">• Policy makers should seek, create, and implement solutions to the housing crisis that provides long term affordable, accessible, and safe housing.
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The report will outline the historical context that has created today’s problems, share CSI’s findings from consultations with students, and provide recommendations to inform and assist in developing solutions to the issues within the student housing experience.

THE STUDENT HOUSING ENVIRONMENT

Over the past decade, the Canadian housing market has been marked by a spiralling increase in housing costs, untethered to any real measure of value, and vastly outpacing the ability of those who live, work, and study in Canada to afford the expenses.⁹ This problem, while country-wide, is of particular concern in Ontario, where the 2022 provincial government *Housing Affordability Task Force Report* revealed that in the last decade, “average house prices have climbed 180% while average incomes have grown roughly 38%.”¹⁰ The problem of out-of-control housing prices is compounded for students, who already live lives of economic and social precarity.¹¹

Ontario communities with growing postsecondary institutions commonly find their student populations competing for their local housing supply. As enrollment in Ontario postsecondary institutions increases with an influx of international students¹² and the private housing market continues down a track of financialization¹³, and rising prices¹⁴, the availability of affordable, community, and on-campus student housing has evaporated.¹⁵ This housing climate is unsustainable for Conestoga students; as housing prices continue to rise and housing stock availability in areas close to Conestoga College campuses continues to decrease, students are often left to choose between bad and worse housing options.

CURRENT HOUSING AVAILABLE TO CONESTOGA STUDENTS: ON-CAMPUS VS. PRIVATE MARKET

According to the 2021 CSI Year-End Survey, 54% of Conestoga students live in private market rental housing, while 28% live with their family, 6% do not have permanent or stable living accommodations, and 5% own their accommodations.¹⁶ Students surveyed were more likely to be unhoused than own their accommodations. That Conestoga students are in such

⁹ Deborah Stokes, “Canada’s Unhinged Housing Market, Captured in One Chart,” *National Post*, November 12, 2021, <https://nationalpost.com/news/canada/canadas-unhinged-housing-market-captured-in-one-chart>.

¹⁰ Housing Affordability Task Force, “Report of the Ontario Housing Affordability Task Force” (Ministry of Municipal Affairs and Housing: Government of Ontario, February 8, 2022), 6, <https://news.ontario.ca/en/release/1001556/ontario-publishes-housing-affordability-task-force-report>.

¹¹ Conestoga Students Inc., “CSI Year End Survey: Your Feedback, Your Experience, Our Priorities,” Unpublished Report (Conestoga Students Incorporated, n.d.), 6.

¹² Ali Khorsandi Taskoh, “Internationalization in Canadian Higher Education Institutions: Ontario,” *Higher Education for the Future* 7, no. 2 (July 1, 2020): 97–117, <https://doi.org/10.1177/2347631120930538>.

¹³ Nick Revington and Martine August, “Making a Market for Itself: The Emergent Financialization of Student Housing in Canada,” *Environment and Planning A* 52, no. 5 (2020): 6.

¹⁴ “The Financialised University,” *CITY* (blog), October 29, 2018, <https://www.city-analysis.net/2018/10/29/the-financialised-university/>; Shirley Won, “Student Housing Proves to Be a Lucrative Niche for Investors,” *The Globe and Mail*, January 21, 2019, <https://www.theglobeandmail.com/investing/globe-wealth/article-student-housing-proves-to-be-a-lucrative-niche-for-investors/>.

¹⁵ “HOUSE,” HOUSE, accessed October 14, 2021, <https://www.houseontario.org>.

¹⁶ Conestoga Students Inc., “CSI Year End Survey: Your Feedback, Your Experience, Our Priorities.”

a risky position, more likely to be unhoused than homeowners, speaks to a lack of affordability in the housing options offered to students, either on-campus or in the private market.

ON-CAMPUS HOUSING

Conestoga College has residence offerings available to both Domestic & International students who attend the Doon or Cambridge Campus. Conestoga's residence was privately built in 1993 with 230 beds to accommodate the approximately 4,500 full-time students attending all Conestoga College campuses,¹⁷ with an additional 230 beds added in 2002 for a student population of roughly 5,700¹⁸; an extra 68 beds were added shortly after that.

Since the latest addition, the college population has grown nearly 500%, to approximately 23,000 full-time students in the 2021 Fall semester. The increase in enrollment has not been matched with an equal apportionment of on-campus housing. In 1993, there was one bed for every 19 full-time students enrolled across all Conestoga campuses; in 2002, there was approximately one bed for every 12 full-time students. As of 2021, there is now one bed available for every 47 full-time students attending a Conestoga College campus, leaving incoming students increasingly vulnerable to the pressures and exploitation prevalent in private market student housing. Conestoga College has taken a position of non-responsibility for student housing, explicitly stating on the college's international student housing resource page, "the college does not provide students with short-term or long-term accommodation. It is the responsibility of the student to secure accommodation arrangements for themselves (and budget appropriately for the local cost of accommodations)."¹⁹

Effectively, there are less than 600 beds provided by Conestoga College for all Conestoga students across all campuses, with pricing that is not tailored towards affordability. The average monthly price for a bed in Conestoga's residence four available room options is \$996.88²⁰, far exceeding the average market rent for an equivalent unit in the Kitchener rental market.²¹ While Conestoga campus accommodations offer amenities that rental

¹⁷ "1967-1992 Conestoga College : 25 Years | Conestoga College," accessed October 18, 2021, <https://conestoga.core.ocls.ca/islandora/object/conestoga%3A6650?search=enrolment%252C%2520conestoga%2520college>.

¹⁸ "Conestoga College : Full Time Post Secondary Enrolment | Conestoga College," accessed October 18, 2021, <https://conestoga.core.ocls.ca/islandora/object/conestoga%3A6362>.

¹⁹ "Housing | International | Conestoga College," accessed October 26, 2021, <https://international.conestogac.on.ca/student-support/housing>.

²⁰ "Rooms and Rates," accessed February 24, 2022, <https://www.conestogac.on.ca/student-housing/conestoga-residence/rooms-and-rates#rooms>.

²¹ The average market rent for a 2 bedroom rental unit in Kitchener-Waterloo is \$1,305 monthly; the average rent per bed is \$652.50, "Ontario — Rental Market Statistics Summary by Metropolitan Areas, Census Agglomerations and Cities," CMHC, accessed February 17, 2022, <https://www03.cmhc-schl.gc.ca/hmip->

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units, apartments, basements and more on the private market do not - including security, on-site study lounges and internet built into the price - the sheer unaffordability of on-campus housing forecloses it as a viable option for many incoming students.²²

PRIVATE MARKET HOUSING

While Conestoga’s residence offerings for students are expensive, the private market does not offer students any form of affordability either. Conestoga students can expect to pay high prices for all accommodation types, including single rooms in shared accommodations. In reviewing data provided to CSI by Places4Students, the recommended housing listing service of CSI, students across all Conestoga campuses can expect to pay, at a minimum, \$600 for a single room in shared accommodations, with pricing increasing by accommodation type. These prices align with CSI's feedback from Conestoga students in our year-end survey, issued from November to December of 2021, with the average rent payment for Conestoga students surveyed being \$744.50.²³

Table 1 - Average Rent Price by Rental Type, 2020, Places4Students data.²⁴

Rental Type	Average Price: Brantford	Average Price: Guelph	Average Price: Kitchener/Waterloo
Room in Household	\$654.00	\$773.00	\$609.50
Studios/Efficiencies	\$742.00	\$1131.00	\$983.00
1 Bedroom House/Duplex	\$968.00	\$936.00	\$1,091.00
1 Bedroom Apartment/Condo	\$1,022.00	\$1,364.00	\$1,303.50
2 Bedroom House/Duplex	\$1,063.00	\$1,477.00	\$1,232.00
2 Bedroom Apartment/Condo	\$1,256.00	\$1,522.00	\$1,469.00
3 Bedroom House/Duplex	\$1,387.00	\$2,008.00	\$1,713.00
3 Bedroom Apartment/Condo	\$1,360.00	\$1,867.00	\$1,985.00

The prices listed in **Table 1** have risen considerably in the last 14 years, as the CMHC reports price increases of 50% for a 1-bedroom rental unit in Kitchener, 58% in Guelph, and

pimh/en/TableMapChart/Table?TableId=2.1.31.2&GeographyId=35&GeographyTypeId=2&DisplayAs=Table&GeographyName=Ontario#1%20Bedroom.

²² “Rooms and Rates.”

²³ Conestoga Students Inc., “CSI Year End Survey: Your Feedback, Your Experience, Our Priorities,” 87.

²⁴ Places4Students, “Places4Students.Com & Conestoga Students Inc. Website Usage Stats” (Places4Students & Conestoga Students Inc., May 2021).

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55% in Brantford since 2008.²⁵ Combine these considerable rises in prices with sub 2% vacancy rates across all Conestoga College campus communities²⁶, and students are left with almost no housing options that meet all their needs.²⁷

Students have unique vulnerabilities to escalating costs because of these price increases and general unaffordability in housing. Only 57% of Conestoga students are currently employed, with another approximately 31% actively looking for work; this has contributed to 81.82% of Conestoga students surveyed having expected to earn less than \$20,000 in 2021, with 59.2% of students surveyed expected to earn less than \$10,000²⁸. With the average room rental price across all Conestoga campus municipalities being more than \$8000 annually, nearly 60% of Conestoga students will be spending almost 80% of their annual income on housing expenses, with more than 80% of Conestoga students paying at least 40% of their yearly income on housing. According to the Canadian Centre for Policy Alternatives 2019 report *Unaccommodating: Rental Housing Wage in Canada*, for Conestoga students in each campus municipality to be able to afford their housing - which, according to CMHC guidelines, would require them to spend 30% of their income or less on housing²⁹ - students would need to either work 58 hours a week at minimum wage or earn \$20 an hour on full-time hours.³⁰ According to the same report, there are currently *no affordable housing options* in the private housing market in Kitchener/Waterloo, Brantford, or Guelph for a student working full-time at the provincial minimum wage.³¹

The sum of the on-campus and private housing options leaves students with functionally no access to legal, safe, and affordable housing. Conestoga students, uniquely vulnerable to rising prices, are being confronted with housing realities that will see them compromise their long and short-term financial stability, their safety, and their quality of life. Students decide to attend college to better their lives for themselves and their families; they should expect to do so without the risk of financial ruin or personal harm.

²⁵ "Ontario — Rental Market Statistics Summary by Metropolitan Areas, Census Agglomerations and Cities," CMHC, col. 2020, accessed February 17, 2022, <https://www03.cmhc-schl.gc.ca/hmip-pimh/en/TableMapChart/Table?TableId=2.1.31.2&GeographyId=35&GeographyTypeId=2&DisplayAs=Table&GeographyName=Ontario#1%20Bedroom>.

²⁶ "Ontario — Rental Market Statistics Summary by Metropolitan Areas, Census Agglomerations and Cities."

²⁷ Anonymous, Housing Focus Group: Conestoga Students Attending Doon Campus, Zoom Meeting, September 28, 2021.

²⁸ Conestoga Students Inc., "CSI Year End Survey: Your Feedback, Your Experience, Our Priorities," 16–17.

²⁹ "About-Affordable-Housing-in-Canada," accessed November 30, 2021, <https://www.cmhc-schl.gc.ca/en/professionals/industry-innovation-and-leadership/industry-expertise/affordable-housing/about-affordable-housing/affordable-housing-in-canada>.

³⁰ David MacDonald, "Unaccommodating - Rental Housing Wage in Canada" (Canadian Centre for Policy Alternatives, July 2019), 12, <https://www.policyalternatives.ca/sites/default/files/uploads/publications/National%20Office/2019/07/Unaccommodating%20-%20Rental%20Wage%20in%20Canada.pdf>.

³¹ MacDonald, 14.

Students are owed accountability from the policy makers and stakeholders responsible for the current housing crisis. Who, then, are the policy makers accountable for the current housing crisis, and what stakeholders influence and affect housing policy at the Federal, Provincial, Municipal and Institutional levels?

STAKEHOLDERS IN HOUSING POLICY

This section will aim to shed light on the stakeholders and their role in shaping housing policy, including student housing, at all levels of government and outline the non-governmental stakeholders within the housing policy field.

FEDERAL GOVERNMENT

The Canadian federal government has had a lengthy history of managing and creating policy directed toward housing; for most of the post-World War II period, the federal government was the main policy engine and funder of social and public housing in Canada.³² The Canadian Mortgage and Housing Corporation (CMHC), created in 1946 to administer the National Housing Act (NHA), operated as a vehicle for constructing affordable rental and owner-occupied housing and for insuring mortgages to encourage lending by large banks. By taking on the risk of insuring loanees, the CMHC could facilitate greater public access to loans to reach the more significant policy objective of widespread home ownership.³³ A programmatic drive toward social and public housing³⁴, subsidization of private rental housing, partnerships with non-profits and cooperatives to fund social housing,³⁵ and policies to create widespread homeownership characterized much of the CMHC's existence until the end of the 1980s.³⁶ For example, between 1980 and 1993, affordable rental units made up on average 49% of all rental unit starts.³⁷ However, beginning in the late 1980s, more significant policy shifts began to create the conditions of the modern housing market,

³² Tony Dalton, "Housing Policy Retrenchment: Australia and Canada Compared," *Urban Studies* 46, no. 1 (January 1, 2009): 68–71, <https://doi.org/10.1177/0042098008098637>.

³³ Alan Walks and Brian Clifford, "The Political Economy of Mortgage Securitization and the Neoliberalization of Housing Policy in Canada," *Environment and Planning A: Economy and Space* 47, no. 8 (August 1, 2015): 1628–31, <https://doi.org/10.1068/a130226p>.

³⁴ The CMHC defines Social Housing as, "housing subsidized by governments (often developed in collaboration with the private and public not-for-profit sector) that is made available to those who would otherwise be unable to afford to live in suitable and adequate housing in the private market. Client groups for social housing include low-income singles and families, recent immigrants, lone-parents, seniors, persons with disabilities, Aboriginal people, and victims of domestic violence (CMHC 2011, p.127).

³⁵ Jason Hackworth, "Neoliberal Ideas and Social Housing Realities in Ontario – Planners Network," accessed February 10, 2022, <https://www.plannersnetwork.org/2005/07/neoliberal-ideas-and-social-housing-realities-in-ontario/>.

³⁶ According to Tony Dalton, this was characterized by two (2) distinct phases and views of social and public housing. First, the CMHC was the primary funder and builder of social housing units. In the 1970's, following reforms to the NHA, the CMHC shifted from the builder of first resort to partnering with non-profits and cooperative housing organizations to provide social and public housing, with relative success. 71

³⁷ MacDonald, "Unaccommodating - Rental Housing Wage in Canada," 25.

including shifting the role of the CMHC from the broad provision of housing to devolving this responsibility to the provinces and the private sector market.³⁸

The cultural and political turn of the late 1970s and 1980s towards neoliberalism³⁹ created the conditions for the clawing back of public expenditures, offloading of public goods to private markets, and the reorientation of public services to market goals.⁴⁰ This change in housing policy at the federal level resulted in the offloading of the delivery of social and rental housing from a policy goal and responsibility of the federal government to the provinces, who subsequently passed off the responsibility for housing those with lower incomes to private landlords. The CMHC was later reformed to operate like a competitive, private insurance company, employing and leveraging securities⁴¹ and mortgage insurance reforms to achieve housing policy objectives in the place of government funding. The effects of this policy on the student housing experience are discussed later in this [report](#). Ultimately, due to the decisions of the federal government in the early 1990s to cut back social spending, including transferring the remainder of its public housing stock to the provinces,⁴² social housing as a proportion of the Canadian and Ontario housing stock has plummeted. These policy changes have left low-income residents, including students, to increasingly expensive private market predation.

Present Federal Policy

Currently, the federal government is mainly inactive in directly providing student housing or housing generally, whether through social housing, private rental housing, or other forms of direct involvement. While the intentions of much of the federal government funding commitments through the CMHC have been directed to developers building for the general population, the CMHC has provided funding to private actors to construct student

³⁸ Walks and Clifford, "The Political Economy of Mortgage Securitization and the Neoliberalization of Housing Policy in Canada," 1631.

³⁹ David Harvey defines neoliberalism as, "Neoliberalism is ... a theory of political economic practices that proposes that human well-being can best be advanced by liberating individual entrepreneurial freedoms and skills within an institutional framework characterized by strong private property rights, free markets and free trade. The role of the state is to create and preserve the institutional framework appropriate to such practices ...if markets do not exist (in areas such as land, water, education, health care, social security, or environmental pollution) then they must be created, by state action if necessary." David Harvey, *A Brief History of Neoliberalism*, 1st edition (Oxford: Oxford University Press, 2007), 64.

⁴⁰ Walks and Clifford, "The Political Economy of Mortgage Securitization and the Neoliberalization of Housing Policy in Canada," 1627.

⁴¹ For more on securitization, what it is, and how it effects the current Canadian housing market, see Alan Walks and Brian Clifford, "The Political Economy of Mortgage Securitization and the Neoliberalization of Housing Policy in Canada," *Environment and Planning A: Economy and Space* 47, no. 8 (August 1, 2015): 1624–42, <https://doi.org/10.1068/a130226p>.

⁴² City of Toronto: Community Services Committee, "Federal/Ontario Housing Devolution Agreement," Report of Community Services Committee (City of Toronto: Community Services Committee, November 29, 1999), 4, <https://www.toronto.ca/legdocs/1999/agendas/council/cc/cc991214/cms6rpt/cl001.pdf>.

accommodations. It is worth noting that this is a policy choice; there is no constitutional reason the federal government cannot directly fund and build housing itself.

Instead, as outlined in the federal government's 2017 National Housing Strategy Act, amended in 2019, the federal government has taken to creating a National Housing Council, appointed to:

- a. "set out a long-term vision for housing in Canada that recognizes the importance of housing in achieving social, economic, health and environmental goals;
- b. establish national goals relating to housing and homelessness and identify related priorities, initiatives, timelines and desired outcomes;
- c. focus on improving housing outcomes for persons in greatest need; and
- d. provide for participatory processes to ensure the ongoing inclusion and engagement of civil society, stakeholders, vulnerable groups and persons with lived experience of housing need, as well as those with lived experience of homelessness."⁴³

Their description of persons in greatest needs includes young adults, which can be said to encompass a student population. However, there is no mention of "students" in the Act, nor any commitment to funding student housing specifically. Much of the Act's purpose is to address shortages in housing supply by building 125,000 new homes from 2017-2027. While increasing supply is noble and will help address the growing waitlists for social housing spaces, none of the new supply was meant to be explicitly directed to student housing.

The Federal 2021 Budget saw increased funding for increasing the supply of affordable housing units,⁴⁴ including an additional investment of \$1.5 billion in new allotment for the Rapid Housing Initiative and \$600 million over seven years to renew and expand the Affordable Housing Innovation Fund.⁴⁵ Through the Affordable Housing Innovation Fund, organizations like UTILE, with whom CSI partnered to issue the 2021 Flash Housing Survey, received a multi-million dollar investment from the CMHC for the Woodnote housing project. This investment has provided below market value housing and an additional 90 beds for Concordia students in the Montreal area;⁴⁶ as of June 2021, another \$20 million, in the form of a low-cost loan, has been provided to UTILE to construct an additional 123 housing

⁴³ Canada, "National Housing Strategy Act," S.C. 2019, c. 29, s. 313 § (2019), <https://laws-lois.justice.gc.ca/eng/acts/n-11.2/FullText.html>.

⁴⁴ According to the Canada Mortgage and Housing Corporation (CMHC) housing is considered to be affordable when a household spends less than 30% of its pre-tax income on adequate shelter.

⁴⁵ Department of Finance Canada, "Budget 2021 Investments Will Create More Affordable Housing for Canadians," news releases, April 26, 2021, 202, <https://www.canada.ca/en/department-finance/news/2021/04/budget-2021-investments-will-create-more-affordable-housing-for-canadians.html>.

⁴⁶ "Innovative Funding Model Creates Affordable Student Housing in Montreal," accessed October 26, 2021, <https://www.cmhc-schl.gc.ca/en/media-newsroom/news-releases/2019/innovative-funding-model-creates-affordable-student-housing-montreal>.

units.⁴⁷ Through these kinds of investments, in the form of low-cost loans to non and for-profit providers, the federal government is impacting the concrete supply of student housing.

PROVINCIAL GOVERNMENT

The provincial government's housing portfolio is under the Ministry of Municipal Affairs and Housing, whose stated goal is “to build safe and strong urban and rural communities with dynamic local economies, a high quality of life and affordable and suitable homes for everyone.”⁴⁸ The ministry works with municipalities in managing their affordable and social housing stock, creates the legislation and guidelines by which municipal land use policy is governed, works to measure and address homelessness in Ontario, partially funds the construction and repair of social housing and affordable rental housing, and sets the annual rent-increase guideline and other rules related to rental housing.⁴⁹ Through this portfolio, the ministry, and thereby the provincial government, strongly affects the availability and affordability of accommodation in Ontario. However, the province of Ontario has mostly devolved the actual implementation and management of the housing stock to municipalities and municipal service managers.

The Community Housing Renewal Strategy and the More Homes, More Choice Act are the central policy anchors of the current Ontario government's housing supply and affordability plans. The Community Housing Renewal Strategy sets out to accomplish the following goals:

- “Repairing and increasing the supply and mix of well-maintained housing that meets people’s needs,
- Providing opportunity for people to live in housing that meets their needs and supporting them to participate in the economy and their community,
- Increasing efficiency in the system by removing red-tape, improving coordination, and helping providers offer sustainable housing.”⁵⁰

The policy aims to renew the obligation agreements with non-profit and cooperative housing models to maintain and keep portions of Ontario’s social housing stock out of the private market. These agreements, signed with either the CMHC or the Ontario Housing Corporation (OHC; now defunct) over 30 to 40 years ago, are expiring. The expiration of these agreements has already led to the loss of 6,500 homes from Ontario’s social housing portfolio,⁵¹ a problem exasperating the ongoing decimation of the social housing supply.⁵²

⁴⁷ “123 New Units for Students in Montréal,” accessed February 15, 2022, <https://www.cmhc-schl.gc.ca/en/media-newsroom/news-releases/2021/new-housing-units-students-montreal>.

⁴⁸ “Ministry of Municipal Affairs and Housing | Ontario.Ca,” accessed February 15, 2022, <https://www.ontario.ca/page/ministry-municipal-affairs-housing>.

⁴⁹ “Ministry of Municipal Affairs and Housing | Ontario.Ca.”

⁵⁰ “Community Housing Renewal Strategy,” ontario.ca, accessed February 17, 2022, <http://www.ontario.ca/page/community-housing-renewal-strategy>.

⁵¹ “Community Housing Renewal Strategy.”

⁵² “Our Opportunity to End Housing Poverty,” Canadian Centre for Policy Alternatives, accessed February 17, 2022, <https://www.policyalternatives.ca/publications/monitor/our-opportunity-end-housing-poverty>.

Additionally, the province introduced the More Homes, More Choice Act, which has sought to increase Ontario's housing stock by "making it easier for developers to build housing faster by removing red tape."⁵³ While reducing some of the delays associated with planning approvals in municipalities facilitating quicker changes to zoning and bylaws, the Act also limits inclusionary zoning policies. It does not tie any requirement of housing development to affordability.⁵⁴

Present Ontario Policy & Student Renters

Ontario's current housing policy environment actively harms the affordability of existing housing stock for student renters. Over the past 25 years, the private rental market has been more precarious because of Ontario's government policy. In 1998, the *Tenant Protection Act* instituted vacancy decontrol. This measure allows landlords to charge any rent they wish on vacant units, untethered to the rental increase guidelines of the Residential Tenancy Act. The City of Toronto, in the aftermath of this change, highlighted vacancy decontrol as the number one contributor to rental price increases in the city in subsequent years.⁵⁵ This policy remains in place.

The Ontario Government in 2018, through amendments to the Residential Tenancies Act, also lifted rent increase protections on any accommodations available for the first time to rent after 2018. This amendment meant any new developments, rented rooms, basement dwellings, etc., available to rent to students after 2018 would not be subject to rent increase guidelines. Therefore, landlords could charge an arbitrary price for rent year-over-year. In 2018, the Ontario Government also limited the ability of municipalities to enact inclusionary zoning policies, limiting these zoning policies to "contain inclusionary zoning policies in respect of an area that is a protected major transit station area or an area in respect of which a development permit system is adopted or established."⁵⁶ This change severely limits the efficacy of these policies aimed to increase the affordable housing supply and artificially constrains municipal policy makers.

Landlord-Tenant Board

The Landlord-Tenant Board, or LTB, is the primary adjudicator of landlord & tenant disputes in Ontario. The LTB was created in 2007 by the *Residential Tenancies Act*. Functionally, the LTB is designed to enforce the aspects of the Residential Tenancies Act that outline the

⁵³ "Bill 108, More Homes More Choice Act: Changes Related to Affordable Housing," *Cahdco* (blog), July 25, 2019, <http://www.cahdco.org/bill-108/>.

⁵⁴ "Bill 108, More Homes More Choice Act."

⁵⁵ Michael Walker, "Toward Real Rent Control: Requirements for Reform of Ontario Rental Housing Legislation," Report to Committee (Tenant Defence Sub-Committee: City of Toronto, December 7, 2005), <https://www.toronto.ca/legdocs/2006/agendas/committees/td/td060106/it001a.pdf>.

⁵⁶ "The Latest on Inclusionary Zoning," *Urban Strategies*, accessed February 15, 2022, <https://www.urbanstrategies.com/news/the-latest-on-inclusionary-zoning/>.

rights and responsibilities of landlords and tenants and provides a mechanism for both parties to protect and enforce their rights against other parties.

The LTB defines its role as:

- resolving disputes between landlords and tenants through mediation or adjudication,
- deciding eviction applications from co-ops,
- providing information to landlords and tenants about their rights and responsibilities under the RTA.⁵⁷

Students rely on the resources provided by the LTB to help educate themselves as tenants and are often protected by its governing document, the *Residential Tenancies Act*. Students can access information on all aspects of their tenancy, including brochures on rent increase guidelines, legislation and regulations governing their tenancy agreements, the Ontario standard lease form, how to end their residency, and much more.⁵⁸ However, the LTB is not without its issues. It has been plagued by ongoing backlogs and a fee structure for tenant inquiries⁵⁹ that can be considered a barrier for a student population that is often of a lower income.⁶⁰

REGIONAL AND MUNICIPAL GOVERNMENTS

Regional and municipal governments have had an outsized role in the availability of public housing and the approval of private housing development. There are differences in their jurisdictional oversight, but Regional and Municipal governments often work in tandem to address housing in their areas.

Regional Government

Regional governments, like the Region of Waterloo, are responsible for maintaining and managing the social and affordable housing stock in the Region, a responsibility devolved to them by the provincial government over 20 years ago.⁶¹ The Regions of Waterloo, Wellington, and Brant are also responsible for emergency shelters and transitional housing, providing residents in desperate need a haven in the face of homelessness (though Brant's

⁵⁷ "LTB: What We Do," Tribunals Ontario, accessed February 15, 2022, <https://tribunalsontario.ca/lrb/what-we-do/>.

⁵⁸ "Landlord and Tenant Board," Tribunals Ontario, accessed February 15, 2022, <https://tribunalsontario.ca/lrb/>.

⁵⁹ Tenant applications to the LTB about their rights, maintenance, and all other applications comes with a fee of \$53, and the cost to review an order received by a tenant is \$58.

⁶⁰ Conestoga Students Inc., "CSI Year End Survey: Your Feedback, Your Experience, Our Priorities."

⁶¹ "A Brief History of Social Housing," accessed February 15, 2022, https://www.stthomas.ca/living_here/st_thomas_elgin_social_services/housing_and_homelessness_services/a_brief_history_of_social_housing.

service was privatized to the Salvation Army).⁶² These regions also have eviction prevention programs, tenant resources, private rental supplements, and more.⁶³

The Waterloo Region owns and operates more than 2,700 units of co-operative or not-for-profit housing, including 8,990 “affordable” housing units in the Region.⁶⁴ Similarly, the Wellington County social housing stock, operated by the City of Guelph, includes 1,189 not-for-profit units, with an additional 285 units being supported through rent supplements to private landlords. The Brant County social housing stock, operated by the City of Brantford, holds 1,958 not-for-profit and geared-to-income rental housing units, with an additional 479 affordable units.⁶⁵

The Region of Waterloo has also committed to building 2,500 affordable housing units from 2021 to 2026 as part of its “2,500 Homes in 5 Years” platform and has produced 680 affordable units to date. These units are priced at or below 80% of the average market rent. However, given that the backlog on waitlists for affordable housing can sometimes be years long,⁶⁶ the availability of these units for a Conestoga student population that is primarily pursuing 2-year diplomas makes these units a doubtful solution for students. Indeed, student housing initiatives are explicitly excluded from the RFP process for the Region of Waterloo’s affordable housing strategy.⁶⁷ The Region of Waterloo has not made students a priority in their affordable housing plans, as the WUSA 2021 Housing Report found the following:

“There is very little in terms of Regional action on student housing. The Waterloo Region Housing Master Plan 2020-2040 makes no mention of students or young adults and their needs. The Master Plan’s Consultation Summary also fails to mention students or young adults. Feedback was obtained from several stakeholders within the Region, but neither the post-

⁶² “Salvation Army to Deliver Housing Resource Centre Services,” December 22, 2020, <https://www.brantford.ca/en/salvation-army-to-deliver-housing-resource-centre-services.aspx>.

⁶³ “Emergency Housing and Energy Supports,” May 19, 2020, <https://www.wellington.ca/en/social-services/emergencyenergyprogramme.aspx>; “Help Paying Rent,” July 30, 2020, <https://www.regionofwaterloo.ca/en/living-here/help-paying-rent.aspx>; “Rental Assistance,” December 10, 2021, <https://www.brantford.ca/en/living-here/rental-assistance.aspx>.

⁶⁴ City of Waterloo, “Housing Need and Demand Analysis,” Housing Report (City of Waterloo, December 7, 2020), 36, <https://www.waterloo.ca/en/government/resources/Documents/Cityadministration/Housing-Need-and-Demand-Analysis.pdf>.

⁶⁵ City of Brantford and County of Brant, “Mayors’ Housing Partnership Taskforce: Affordable Housing Action Plan” (City of Brantford: County of Brant, December 15, 2020), <https://www.brantford.ca/en/living-here/resources/Documents/Housing/2020-Dec15-MHPTF-ActionPlan.pdf>; Guelph-Wellington, “A Place to Call Home Five Year Update: A 10-Year Housing and Homelessness Plan for Guelph-Wellington,” Housing Report (Wellington County, November 2018), 18, https://www.wellington.ca/en/social-services/resources/Housing/A-PLACE-TO-CALL-HOME_Accessible-Format_Draft_November-2018.pdf.

⁶⁶ Auditor General report

⁶⁷ *Conestoga Students Inc. X Region of Waterloo - Youth Homelessness* (Microsoft Teams, 2022).

secondary institutions nor their student groups were consulted (Region of Waterloo Community Services, 2018).

The Region's Affordable Housing Strategy 2014-2019 mentions student housing just once, when it states, "while there has been an increase in rental housing construction, the majority of new units have been for students or higher end rental housing." The strategy's predominant concern is that of affordability for low to moderate income households, which most out-of-town students do not fall into. The strategy also created 350 affordable housing units, most of which are also quickly occupied, leaving remaining families on waiting lists (Region of Waterloo Housing, 2019)."⁶⁸

The Region of Waterloo is not alone in overlooking the unique lived experiences of students in their affordable housing strategies and documents. Both Wellington County and the joint affordable housing task force for Brant County and Brantford have notable gaps in solutions for student housing issues. The policies put forth by these regional governments often hope broader actions aimed to alleviate the housing conditions of the general population will also assist students.⁶⁹ However, many of these solutions, as with the policies of the federal and provincial governments, aim to increase homeownership rates, leaving student populations, whose stay in their school's community is often temporary, without dedicated housing resources.

Municipal Government

Under the Municipal Act, 2001, municipalities have broad powers to pass bylaws (subject to certain limits) on matters such as health, safety, and the city's well-being and protect persons and property. These powers expressly set out municipalities' mandates for licensing rental housing, regulating rental housing, and zoning land for housing development.

Students' access to safe dwellings is implicated in the local bylaw and licensing regimes. In the absence of these regimes, students are left to determine if their prospective or current housing situations are safe according to local bylaws. For a growing international student population unfamiliar with rental practices in a Canadian context, municipal decisions on housing bylaws and licensing have massive implications for the availability and safety of their housing options.

For students, availability, affordability, and housing safety are also associated with municipal zoning decisions. Municipalities that have "people zoning" practices, such as the City of Kitchener was found to have in a 2011 Ontario Human Rights Commission report, can deliberately exclude certain populations from accessing housing in specific parcels of land, with students often being targeted. Zoning can also be used strategically by municipalities to encourage specific forms of development, including incentivization for affordable housing or incentives for developers to build student accommodations. The types of housing

⁶⁸ Jaskaran Dhillon et al., "WUSA 2021 Housing Report" (Waterloo Undergraduate Student Association, May 31, 2021), <https://wusa.ca/news-updates/wusa-2021-housing-report>.

⁶⁹ City of Brantford and County of Brant, "Mayors' Housing Partnership Taskforce: Affordable Housing Action Plan."

developments approved, to be developed by whom, under what constraints and conditions are all determined at the municipal level and can have massive effects on Conestoga students' housing options' affordability, availability, and safety. For example, a decision by a municipality to designate a property as mixed-use vs. single-family residential can have significant effects on the affordability of housing in the new lot and surrounding neighbourhoods. It can drastically change a neighbourhood's character openness to a student population.⁷⁰ Therefore, municipalities have an outsized role in shaping the housing landscape for Conestoga students.

LANDLORDS & PROPERTY OWNERS

Landlords are the primary providers of housing for Conestoga students; according to CSI's 2021-year end survey, 55% of Conestoga students surveyed are renters.⁷¹ It is uncontroversial to say that landlords, therefore, have an immense impact on the availability, quality, and affordability of housing for Conestoga's student population, given that 96% of Waterloo regions' housing stock costs lie strictly in private landlords' hands.⁷²

The Waterloo Region is a unique case in Canada due to the volume of corporate, investment-based landlords in the Region; 1 in 5 units in the Waterloo region is owned by a non-occupant, suggesting these properties are strictly for the extraction of rental income. Additionally, 24% of Waterloo Region's PBSA's are owned by a financial vehicle like a REIT or corporate landlord.⁷³ There are also existing landlord advocacy groups, such as the Waterloo Region Apartment Management Association, who have opposed municipal licensing and bylaw changes.⁷⁴

Property owners, more broadly, have a significant impact on policymakers' capacity to enact changes that would be beneficial – or detrimental – to students. Through membership in municipal committees like Town and Gowns and an outsized voice in discussions on local housing,⁷⁵ property owners can make or break the availability of affordable and safe accommodations for students in the community.

⁷⁰ Markus Moos et al., "Planning for Mixed Use: Affordable for Whom?," *Journal of the American Planning Association* 84, no. 1 (January 2, 2018): 7–20, <https://doi.org/10.1080/01944363.2017.1406315>.

⁷¹ Conestoga Students Inc., "CSI Year End Survey: Your Feedback, Your Experience, Our Priorities."

⁷² City of Waterloo, "Housing Need and Demand Analysis," 37.

⁷³ Revington and August, "Making a Market for Itself," 12.

⁷⁴ "A Tale of Two Cities': Landlord Licensing in Waterloo v. Guelph, Update," Cohen Highley LLP Lawyers, September 16, 2014, <https://cohenhighley.com/articles/rent-control-bulletins/a-tale-of-two-cities-landlord-licensing-in-waterloo-v-guelph-update/>.

⁷⁵ Carmen Ponciano · CBC News ·, "Rise in Student Housing Concerns Homeowners near Conestoga College | CBC News," CBC, February 7, 2017, <https://www.cbc.ca/news/canada/kitchener-waterloo/doon-residents-development-conestoga-student-housing-1.3970496>; "Student Lodge for Lower Doon Neighbourhood Rejected by City's Planning Committee | Toronto.Com," accessed February 24, 2022, <https://www.toronto.com/news-story/7225791-student-lodge-for-lower-doon-neighbourhood-rejected-by-city-s-planning-committee/>; "Student Townhouse Proposal Seen as 'tipping Point' for Lower Doon," *therecord.com*, May 25, 2018,

POSTSECONDARY INSTITUTIONS

Postsecondary institutions have a prominent role in providing on-campus student accommodations and providing students with the resources and support they need to find appropriate accommodations in the private market. The majority of postsecondary institutions around Ontario provide on-campus student residences to students, with over 400 dedicated student residences in the province.⁷⁶ These accommodations are often geared to market-rate rent, with the bonus of proximity to campus and added amenities geared to the student experience. Conestoga College currently operates one residence at its Doon campus. The residence was privately built in 1993 with 230 beds to accommodate approximately 4,500 full-time students attending all Conestoga College campuses⁷⁷ with an additional 230 units added in 2002 for a student population of approximately 5,700⁷⁸; an additional 68 beds were added shortly after that. Since the latest addition, the college population has grown nearly 500%, to around 23,000 full-time students in the 2021 Fall semester. The increase in enrollment has not been matched with an equal apportionment of on-campus housing.

Additionally, postsecondary institutions often provide creative and informative support for students in their housing search. For example, Brock University has created a one-stop information hub for all students to learn about living in the Niagara Region, their responsibilities as tenants, community and school resources available to them and more.⁷⁹ Brock's website includes listings for accommodations and advises students on vetting and practicing safe housing searches. Brock also offers dedicated and in-depth resources for landlords and community residents renting to or living in the neighbourhood with students.

Conestoga College's current student housing supports are relatively comprehensive. Still, they are almost entirely directed towards international students, leaving domestic students without awareness or access to the same housing information or resources.

SAS

The role of student associations in the housing field is often tied to advocacy and support services. SA's in Conestoga's shared campus municipalities, including Guelph's Central

<https://www.therecord.com/news/waterloo-region/2018/05/25/student-townhouse-proposal-seen-as-tipping-point-for-lower-doon.html>.

⁷⁶ "Designated Students' Residences" (Government of Ontario, Ministry of Finance), accessed February 23, 2022, <https://www.fin.gov.on.ca/en/formpub/topic/data.html?bid=149>.

⁷⁷ "1967-1992 Conestoga College : 25 Years | Conestoga College," accessed October 18, 2021, <https://conestoga.core.ocls.ca/islandora/object/conestoga%3A6650?search=enrolment%252C%2520conestoga%2520college>.

⁷⁸ "Conestoga College : Full Time Post Secondary Enrolment | Conestoga College," accessed October 18, 2021, <https://conestoga.core.ocls.ca/islandora/object/conestoga%3A6362>.

⁷⁹ Brock University Housing Services, "Resources."

Student Association, Waterloo Undergraduate Students Association, and the Wilfred Laurier Universities Student Union, all have resources and FAQs on private market renting.⁸⁰

Student associations across Ontario are confronted with a similar housing crisis and are attempting to organize and advocate for changes that would alleviate some of the pressures surrounding housing for their student population.

Many student associations have begun to take housing issues into their own hands by issuing reports on the housing landscape for their respective student bodies or starting to build student housing themselves. For example, the Waterloo Undergraduate Student Association released a detailed housing report in the spring of 2021. Concordia Student Union has developed its below-market student housing with UTILE, its non-profit housing partner.⁸¹ Provincial SA's, such as CSA, CFS-Ontario, and others, have expanded their advocacy portfolios to include student concerns on student housing.⁸²

Building on the model of Concordia's Student Union and its partner organization UTILE, HOUSE, a student housing non-profit based out of York University, is working to provide below-market student housing for Ontario-based SA's.⁸³ Its membership currently includes the York Federation of Students and the University of Toronto Mississauga student union, and it has already received funding from the CMHC for its project.⁸⁴ HOUSE is currently looking to expand its membership to include more Ontario-based SA's.

COMMUNITY ADVOCACY GROUPS

Several community advocacy and support groups are embedded within the Waterloo Region and beyond that aim to ameliorate adverse housing conditions, support tenants and homeowners, and work to boost their own housing agenda. CSI has contacted and worked with many of these groups on issues that align with our students' interests, including Waterloo Region Yes In My BackYard (WR YIMBY). WR YIMBY is a housing advocacy group that "urges the cities of Waterloo Region to adjust their zoning to allow for more housing,

⁸⁰ "Winter 2022 Housing Information," Waterloo Undergraduate Student Association, December 1, 2021, <https://uwaterloo.ca/waterloo-undergraduate-student-association/winter-2022-housing-information>; "Student Rights Advisory Committee," *Wilfrid Laurier University Students' Union* (blog), August 18, 2016, <https://yourstudentsunion.ca/service/student-rights-advisory-committee/>; "Renting Off Campus FAQs | Central Student Association," accessed February 22, 2022, <https://csaonline.ca/shac/renting-off-campus-faq>.

⁸¹ "The Woodnote – Concordia Student Union," accessed February 17, 2022, <https://www.csu.qc.ca/projects/woodnote/>.

⁸² CFS-Ontario, "2022 Budget Submission," January 26, 2022, <https://cfsontario.ca/wp-content/uploads/2022/02/2022-Budget-Submission.pdf>; CSA, "Ontario Budget Submission 2022: College Student Alliance," January 2022, https://www.collegestudentalliance.ca/_files/ugd/0b1b3b_5da327e5a1c84a24990f70c8cb757ec6.pdf.

⁸³ "HOUSE."

⁸⁴ *HOUSE x CSI Meeting* (ZOOM, 2022), <https://yorku.zoom.us/j/95604280040>.

SUPPORTING AND ADDRESSING THE STUDENT HOUSING EXPERIENCE ///

especially affordable housing.⁸⁵ CSI has worked with WR YIMBY in advocating for changes to the City of Kitchener’s zoning and licensing By-Laws.

There are numerous other community housing advocacy and support groups, including the Unsheltered Campaign⁸⁶, Waterloo Region Community Legal Services⁸⁷, the Advocacy Centre for Tenants Ontario⁸⁸, the Association of Community Organizations for Reform Now (ACORN)⁸⁹, UNION Co-operative⁹⁰ and more, who all seek to support residents and advocate for a particular vision of housing in Conestoga campus communities.

⁸⁵ WR YIMBY, “About Us,” Waterloo Region Yes in My Backyard, accessed March 21, 2022, <https://www.wryimby.com/what-we-do>.

⁸⁶ A campaign led by community advocates who are housed and not housed to provide 24/7 year-round alternatives to shelter and housing for all unsheltered people in Waterloo Region. “Unsheltered Campaign | Civic Hub Waterloo Region,” accessed March 21, 2022, <https://civichubwr.org/unsheltered-campaign/>.

⁸⁷ One of 76 Community Legal Clinics in Ontario assisting residents with a variety of legal issues, including housing and tenant rights. “Tenant Issues – Waterloo Region Community Legal Services,” accessed March 21, 2022, <https://www.wrcls.ca/tenant-issues/>.

⁸⁸ a specialty community legal clinic with a provincial mandate to advance and protect the interests of low-income tenants. They specialize in housing issues related to tenants in Ontario. “Advocacy Centre for Tenants Ontario - ACTO,” Advocacy Centre for Tenants Ontario - ACTO, accessed March 21, 2022, <https://www.acto.ca>.

⁸⁹ A multi-issue, membership-based community union of low- and moderate-income people. “ACORN Canada,” ACORN Canada, January 18, 2013, <https://acorncanada.org/about>.

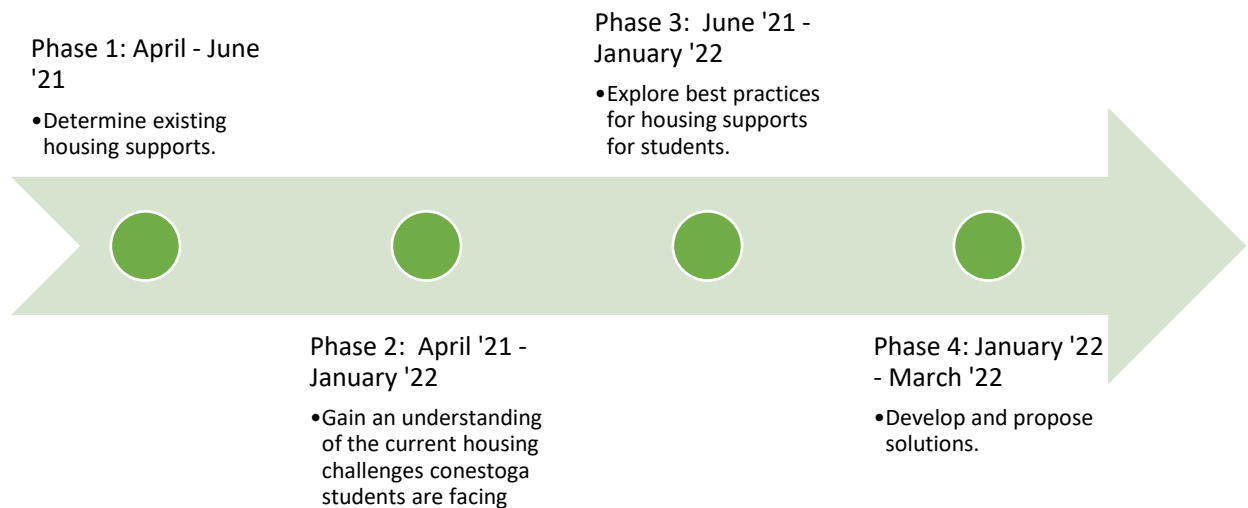
⁹⁰ A Waterloo Region based community co-operative with a unique funding model, working to buy residential and commercial properties in Waterloo Region for permanent affordability through community ownership. Properties purchased, owned, and managed by UNION would be permanently kept “affordable” – or below market rate – while still providing dividends to co-operative investors or members. “Who We Are,” Union Co-operative, accessed March 21, 2022, <https://www.unionsd.coop/whoweare>.

OVERVIEW OF RESEARCH PROJECT

Through anecdotal evidence and the increasing environmental housing pressures, it was determined that a comprehensive understanding of the student housing environment was required. The student housing experience and landscape is a complicated environment with a wide variety of stakeholders from different levels of government, private actors, and quasi-judicial organizations, as identified previously. To gain a comprehensive understanding of the student housing experience of Conestoga College students, a 4-phase research project was designed and undertaken by CSI's Advocacy Team. The 4-phase project was divided into the following four key phases:

1. Determine the existing housing supports available to Conestoga students.
2. Gain an understanding of the current housing challenges Conestoga students are facing.
3. Explore best practices for providing housing support.
4. Research, develop, and propose solutions to provide comprehensive student housing supports for Conestoga students.

The research project was completed according to the following timeline spanning the 2020-2021 and 2021-2022 academic years.



The scope for each phase was determined based on the available information and resources available to the CSI Advocacy Team. The scope for each phase and the actions taken during each phase are explained below.

PHASE 1: DETERMINE THE EXISTING HOUSING SUPPORTS AVAILABLE TO CONESTOGA STUDENTS

The first phase of the project focused on determining what housing supports were already available to Conestoga students. The scope of this exploratory phase was limited to the following avenues:

1. Research of the Conestoga College website
2. Contacting appropriate Conestoga College departments:
 - a. Conestoga International
 - b. Student Engagement
 - c. Security Services
 - d. Be-Dah-Bin Gamik (Indigenous Services)
 - e. Student Rights and Responsibilities
3. Research of the services available internally from Conestoga Students Inc.
4. Research of housing support services targeted to students by the municipalities or organization's within the municipalities of:
 - a. Kitchener
 - b. Waterloo
 - c. Cambridge
 - d. Brantford
 - e. Guelph

PHASE 2: GAIN AN UNDERSTANDING OF THE CURRENT HOUSING CHALLENGES CONESTOGA STUDENTS ARE FACING

The second phase of the project was focused on building a deeper understanding of the current challenges apparent in the student housing environment. To gain an understanding and ensure the solutions proposed are student-centred, the following research mixed-methods were implemented:

- FLASH 2021 Housing Survey
- Housing Focus Groups
- Housing Town Hall
- 2021 CSI Year-End Survey

PHASE 3: EXPLORE BEST PRACTICES FOR PROVIDING HOUSING SUPPORTS

The third phase of the project was focused on conducting an environmental scan of postsecondary institutions, housing not-for-profits, and municipalities across Canada, to determine what best practices are available to use as a model for adoption. This scan was conducted through online methods.



PHASE 4: RESEARCH, DEVELOP, AND PROPOSE SOLUTIONS TO PROVIDE COMPREHENSIVE STUDENT HOUSING SUPPORTS FOR CONESTOGA STUDENTS

The final phase of the project took into consideration the research that had been completed on best practices for providing student housing supports and services, and the solicitation of the student perspective on housing challenges, in conjunction with organizational brainstorming to create recommendations to ensure comprehensive solutions are available to address the issues prevalent in the student housing environment.

PROBLEM IDENTIFICATION, CONESTOGA STUDENT EXPERIENCE, BEST PRACTICES & PROPOSED SOLUTIONS

As Conestoga's official student association, CSI constantly communicates with students, receives feedback on their lived experiences, and tries to effect change to make students' lives better. Thanks to Conestoga students' willingness to be forthcoming and honest regarding their housing experiences, CSI gathered valuable information on student housing to be used during our research. Of the myriad insights collected from both CSI's housing surveys and focus groups, students identified common themes repeatedly. These common themes varied to a minor degree, with personal experience shading how students may have perceived a particular problem. However, the three significant themes to emerge from CSI's canvassing of student feedback were:

- Absence of Reliable Housing Information & Resources contributing to Unsafe Housing Conditions
- Housing Unavailability
- Housing Unaffordability

Students often related these issues in their own way, frequently referring to a personal experience; for instance, several students have told CSI they gave up on finding safe *and* affordable accommodations, and one factor, safety, or affordability, would have to be sacrificed to find housing.⁹¹ The advocacy department interpreted these statements to attest to students' constrained choices to find accommodation in the private market. Hearing this feedback, CSI's Advocacy Team researched the underlying causes of Conestoga students' housing issues. Below is a summary of the problems specific to students at Conestoga College campuses, gathered by CSI through focus groups, surveys, and secondary research. While no one issue or theme can be separated from the others, as all the pieces listed are intrinsically linked to the compounding factors, they are separated below. Best practices in the relevant policy area are also highlighted below. Finally, our recommendations for solving these myriad issues are included in the next section of this report.

THEME 1: ABSENCE OF RELIABLE HOUSING INFORMATION & RESOURCES CONTRIBUTING TO UNSAFE HOUSING CONDITIONS

Conestoga students who provided feedback to CSI through our housing surveys and focus groups were broadly unaware of reliable housing information to assist them in their housing search from both Conestoga and municipal and regional resources. Often, students spoke as though they were unbothered by their unsafe housing conditions; they were not armed with the information or knowledge to know specific issues or landlord practices were dangerous or illegal. Students would speak of sharing rooms with 2, 3 or more other

⁹¹ Anonymous, Housing Focus Group: Conestoga Students Attending Doon Campus.

persons⁹² and the prevalence of frauds and scams in their housing search.⁹³ Additionally, several instances of broken or faulty utilities and amenities in students' buildings (unlocked entryways, broken appliances, etc.)⁹⁴ would go unsolved for prolonged periods due to landlord inaction. The problem of student unfamiliarity with the resources and information available to them on their housing search⁹⁵ and their rights and responsibilities as tenants often lead to students finding themselves in unsafe housing conditions. Students cited external restraints, such as a lack of credit guarantors available to international students without an existing credit history,⁹⁶ as exasperating an already desperate dash to find accommodations in a constrained and expensive housing market. However, it must be stated that a lack of information and support is only part of the story of students' unsafe housing. The material realities of housing and the fact that dangerous, illegal units are far more affordable to a student population⁹⁷ must also be reckoned with. These problems are discussed thoroughly later in this section.

PROBLEM 1: INTERNATIONAL STUDENTS ARE BEING MISLED BY INTERNATIONAL RECRUITMENT AGENTS ON THE ACTUAL COSTS OF HOUSING WHEN ATTENDING CONESTOGA

International student tuition continues to make up an ever-greater portion of Ontario college revenue. Unlike domestic students, for whom tuition increases are limited to a max of 5% per annum based on their program, the Ontario government permits a rise in international student tuition of up to 20%.⁹⁸ In addition to the problematic differential and higher existing fees for international students and the continued decreases in government funding, this discrepancy creates a distorted incentive for colleges, Conestoga included, to generate revenue by increasing international student enrollment.

However, the recruitment agents and agencies contracted by colleges like Conestoga are often not forthcoming and honest with the international students they bring in. A report by the Independent Commission Against Corruption in New South Wales, Australia, found that the global student recruitment system was rife with agents engaging in unsavoury practices to secure as many students as possible for their employers.⁹⁹ According to the Walrus, the pay for an agent “is 15 to 20 percent of a student’s first year of tuition—a rate that can net

⁹² Anonymous, Housing Focus Group: Conestoga Students Attending Brantford Campuses, Zoom Meeting, October 12, 2021.

⁹³ Anonymous, Housing Focus Group: Conestoga Students Attending Cambridge Campuses.

⁹⁴ Anonymous, Housing Focus Group: Conestoga Students Attending Waterloo Campuses.

⁹⁵ Anonymous, Housing Focus Group: Conestoga Students Attending Cambridge Campuses.

⁹⁶ Anonymous, Housing Focus Group: Conestoga Students Attending Waterloo Campuses.

⁹⁷ Anonymous, Housing Focus Group: Conestoga Students Attending Doon Campus.

⁹⁸ “Tuition and Ancillary Fees Reporting Operating Procedure,” 2003, 24.

⁹⁹ ICAC, “Learning the Hard Way: Managing Corruption Risks Associated with International Students at Universities in NSW” (New South Wales), accessed February 24, 2022, <https://www.documentcloud.org/documents/1876030-learning-the-hard-way-managing-corruption-risks>.

them anywhere from \$1,500 to \$5,000 a head.”¹⁰⁰ Agents are incentivized to entice as many prospective students as possible with an “unrealistic vision of Canada.”¹⁰¹ When students arrive to attend Conestoga College, they are unprepared for the costs of living, and with international students only able to work 20 hours a week, they are either barely able to survive or find work with exploitative “under-the-table pay.”

CSI heard firsthand from students stating that they had been misled about education costs, including housing, by their recruiting agents. One student commented, “the agents left me very uninformed; the agents just cared about getting me here, not ensuring I was supported when I got here.”¹⁰² International students are being misled by recruiting agents and are now forced to confront a student housing reality for which they are financially unprepared.

PROBLEM 2: LIMITED HOUSING RESOURCES AVAILABLE FOR ALL STUDENTS

As mentioned previously,¹⁰³ current student housing supports readily available through Conestoga College differ drastically between those for the general student population and supports and information geared directly to international students. However, this does not support the view that the current international supports themselves are sufficient. Many students have cited a lack of awareness of Conestoga’s housing supports or a general insufficiency in the current housing offerings.

In recent months, Conestoga International has created and added a new resource called “Conestoga’s off-campus housing guide for international students.” The guide provides an updated estimate for expected housing prices more in line with the current market rents and expected additional costs.¹⁰⁴ It outlines a 6-step process to securing off-campus housing for students to follow, including tips, tricks, and further resources to aid in their housing search.¹⁰⁵ These resources are a welcome addition to Conestoga’s International department’s other supports and resources.

The pre-existing housing tips and information offered include:

- Reminders to start their housing search early to ensure they have accommodations and FAQs surrounding housing and COVID-19.

¹⁰⁰ “The Shadowy Business of International Education | The Walrus,” August 18, 2021, <https://thewalrus.ca/the-shadowy-business-of-international-education/>.

¹⁰¹ “The Shadowy Business of International Education | The Walrus.”

¹⁰² Anonymous, Housing Focus Group: Conestoga Students Attending Cambridge Campuses.

¹⁰³ See Stakeholders, Sub header “Colleges”

¹⁰⁴ Conestoga International, “Conestoga International Off-Campus Housing Guide: Information to Help You With Your Off-Campus Housing Search,” Conestoga International: Housing, accessed March 17, 2022, <https://cms.conestogac.on.ca/sites/corporate-websites/international/Shared%20Documents/off-campus-housing-guide.pdf>.

¹⁰⁵ Conestoga International.

- Links to online community support for international students, including Facebook groups such as Conestoga College International Students and Conestoga International Student's Society.
- Warnings surrounding expected costs (international students are told to expect to spend at least \$500 a month on housing.)¹⁰⁶
- Links to informative documents from Settlement.Org regarding the tenancy experience, including:
 - What Kind of Questions Can a Landlord Ask?
 - Understanding For Rent Ads
 - Avoiding Rental Scams.
- Links to Housing Checklists compiled by Conestoga International.
- Resources for understanding landlord and tenant rights and responsibilities, including resources on housing law, a link to CLEO's housing law resources, and links to the Landlord Tenant Board and general tenant information.
- One-on-One housing resource sessions with international student advisors.
- Webinars, YouTube videos and pre-arrival housing sessions.

All additional resources available are tailored directly to Conestoga's international student population, including Conestoga College's collaboration with the Homestay Network, YouTube tutorials, and housing drop-in information sessions on the Co-Curricular Portal exclusive to international students.

Currently, the only available resources for domestic students is Places4Students, a third-party website that caters to student rentals and the CSI Legal Protection Program, an optional ancillary fee that provides legal assistance for housing disputes. Places4Students does not provide a comprehensive housing toolkit for students, with no personal support for domestic student needs. The divide of resources marketed to one segment of Conestoga College's student population belies the reality that all students are being affected by the housing crisis. Domestic students are in just as much need of support as their international peers. The absence of easily accessible, cohesive, and equitable housing supports for all students at Conestoga College, apart from resources tailored only to international students, contrasts with many existing best practices at other Ontario PSEs.

PROBLEM 3: ABSENCE OF PROACTIVE RENTAL OVERSIGHT

Rental licensing is a form of municipal governmental oversight that exists in addition to legislation at the provincial level, specifically, the regulations of landlord responsibility and behaviour in the Ontario Residential Tenancies Act. Many municipalities have existing property standards and health and safety bylaws that theoretically address many unsafe and exploitative situations tenants may encounter. The onus in cities without proactive rental oversight lies with the *renter* to be aware of the relevant standards and bylaws¹⁰⁷ and

¹⁰⁶ "Housing | International | Conestoga College."

¹⁰⁷ "What Is Landlord Licensing? | ACORN Canada," accessed August 9, 2021, <https://acorncanada.org/resource/what-landlord-licensing>.

to report these issues to the appropriate municipal or provincial authorities. This system is called a complaint-based inspection system, where only *reported* non-compliance triggers a municipal inspection of a rental unit. In this system, *non-compliance is only discovered and reported by tenants*, who are left to risk suffering the consequences of exposure.

Alternatively, licensing structures take the responsibility to ensure safe and legal rental housing out of the hands of the individual renter and create a system wherein municipalities require inspections for rental properties. Under a licensing structure, property owners who wish to place a housing unit they own for rent within a city must register the property with the respective municipality. To maintain a license in good standing and therefore be legally permitted to place their unit on the rental market, landlords would have to meet property standard bylaws and submit to periodic, proactive unit inspections by municipal bylaw officers. Pre-emptive and proactive reviews can help prevent landlord absenteeism¹⁰⁸ and catch code and property standard violations before more serious issues arise.

Many Conestoga students renting in their campus municipalities are currently unprotected by any rental licensing structure, even in municipalities with a licensing system. Students at all Conestoga College campuses have experienced the downstream effects of an absence of rental housing licensing in the municipalities and communities in which Conestoga College students are embedded. These include reports of unsafe and overpopulated living conditions, illegal rental units, student exploitation through non-standard lease agreements, and living conditions and quarters that violate health and safety bylaws.¹⁰⁹

Currently, the municipalities of Kitchener, Cambridge, Brantford, and Guelph have no rental licensing structure in place and rely on tenant reports of bylaw violations to learn of illegal and unsafe properties. The City of Waterloo does have a rental licensing program.

Nonetheless, the context behind each municipality's licensing decision varies. Specifically:

- In 2014, the City of Guelph considered and decided not to implement a licensing program for rental housing, citing that licensing would not necessarily address concerns expressed by those living in neighbourhoods with high concentrations of rental housing. According to the City of Guelph, the cost of administering the program would likely be passed on to tenants.¹¹⁰
- The City of Waterloo does not require apartment buildings to have a license to carry on a residential rental business per bylaw 2011-047, item 2.7c. Under these circumstances, landlords who rent out apartments in high-rise buildings are not subject to licensing regulations and would only be subject to an amendment of

¹⁰⁸ "What Is Landlord Licensing? | ACORN Canada."

¹⁰⁹ Anonymous, Housing Focus Group: Conestoga Students Attending Doon Campus; Anonymous, Housing Focus Group: Conestoga Students Attending Waterloo Campuses; Anonymous, Housing Focus Group: Conestoga Students Attending Brantford Campuses.

¹¹⁰ "Re: Report No. 14-29, Rental Housing Licensing Recommended Approach | Ontario Human Rights Commission," accessed February 15, 2022, https://www.ohrc.on.ca/en/news_centre/re-report-no-14-29-rental-housing-licensing-recommended-approach.

bylaw 2011-047¹¹¹. This oversight leaves many students outside of the rental licensing structure, Conestoga students included.

- The City of Kitchener, which currently only requires a license from landlords to rent lodging home properties in the city, is exploring the possibility of implementing a more comprehensive rental licensing structure, as highlighted in the Lower Doon Land Use Study.¹¹²
- The City of Brantford does not currently have a licensing structure for long-term rental units.
- The City of Cambridge does not currently have a licensing structure for long-term rental units.

While it is encouraging that the City of Kitchener is moving towards a licensing structure, the lessons of the City of Waterloo are a reminder that these structures can contain gaps. These gaps can continue to leave students vulnerable to predation and exploitation. In the absence of licensing that enforces safe housing in their communities, Conestoga students are forced to become *the* bylaw enforcement mechanism, an undue responsibility for any resident, let alone a student population. As WUSA's housing report discovered, only 15% of their students had received the Ontario Standard Lease that landlords are required to use.¹¹³ Of those leases, 70% had additional illegal clauses.¹¹⁴ These students were unaware of the Ontario Standard Lease and now could be forced to follow the dispute process from the LTB at their own cost to address their problem. The process for handling disputes under the Residential Tenancies Act requires tenants to pay approximately \$53 to file a complaint against their landlords.¹¹⁵

While many tenant rights and responsibilities fall under the Residential Tenancies Act, tenants and landlords must also follow bylaws applicable to the municipality they are located within. As mentioned, bylaws are commonly enforced through a complaint-based system putting the onus on tenants to know the bylaws and follow up with their local bylaw enforcement if the landlord does not rectify the problem. This system leaves many students fearful of unlawful reprisal from their landlords, who have been reported to provide threats of eviction, lawsuits, and more.¹¹⁶

¹¹¹ Federation of Students' Council, "Federation of Students' Council Agenda: October 4, 2020," Agenda, October 4, 2020, 21, https://wusa.ca/sites/ca.waterloo-undergraduate-student-association/files/uploads/files/oct_2020_agenda.pdf.

¹¹² Bray Heritage, "Lower Doon Land Use Study Final Report," Final Report (City of Kitchener: City Council, March 9, 2021), https://www.kitchener.ca/en/resourcesGeneral/Documents/DSD_PLAN_2177_Lower_Doon_Report.pdf.

¹¹³ Jaskaran Dhillon et al., "WUSA Housing Report" (Waterloo Undergraduate Student Association, May 2021), accessed August 31, 2021 https://wusa.ca/sites/ca.waterloo-undergraduate-student-association/files/uploads/files/wusa_housing_report_may_2021_1.pdf?.

¹¹⁴ Dhillon et al.

¹¹⁵ "LTB: Filing and Fees," Tribunals Ontario, accessed August 31, 2021, <https://tribunalsontario.ca/lrb/filing-and-fees/>.

¹¹⁶ "Waterloo Students Say They Were Threatened by Landlord after Leaving Bad Reviews on Google," *The Hamilton Spectator*, November 9, 2018, sec. Ontario,

As Conestoga College continues to expand and focus on increasing domestic and international enrolment,¹¹⁷ the effects of a limited rental housing supply will compound the pressure on tenants to accept substandard housing conditions. Students already agree to illegal leases and relinquish their tenant rights by staying in illegal units to secure housing. Absent any form of proactive measures by municipalities to ensure safe accommodations, Conestoga students will remain vulnerable.

PROBLEM 4: INCREASE OF STUDENTS FORCED INTO HOUSING OPTIONS THAT ARE NOT PROTECTED BY THE RESIDENTIAL TENANCIES ACT (RTA)

As more students, predominantly international in origin, filter into the municipalities where Conestoga College campuses are located, the unavailability of housing and lack of information on legal and safe accommodations puts students in a vulnerable position. As CSI heard from numerous students in our housing focus groups and confirmed in our housing surveys, several students are renting rooms in shared accommodations with landlords, not dwelling spaces. Subsequently, they are not protected by the Residential Tenancies Act's protections.

For context, in the CSI Year-End Survey issued to Conestoga's student population from November 2021 to December 2021, 31.35% of students surveyed stated that they live in shared accommodations with their landlords.¹¹⁸ In focus groups run by CSI in September and October of 2021, several students related that this reality often resulted from necessity. Unaware of finding legal and safe accommodations, many students relied on peer and social network groups to locate housing. The cheapest options available were single-room rentals in a shared space with the property owner. Consequently, a startling number of students could lose their accommodations at a moment's notice, not being subject to the requirements to end a tenancy of the RTA. For students at the mercy and charity of landlords, more significant stress has been added to an already stressful and precarious housing environment, one that Conestoga College is *actively* exasperating.

In December of 2021, in preparation for a massive influx of students into an already overheated housing market, Conestoga College's attempt to help provide housing to this incoming cohort was to solicit faculty and staff and their friends and family to rent rooms to incoming students in their homes. This call was not a request for faculty and staff with secondary or basement dwellings up to municipal bylaw code to lease their units, but rather a request that faculty and staff rent *rooms* to students. To quote the email directly:

<https://www.thespec.com/news/ontario/2018/11/09/waterloo-students-say-they-were-threatened-by-landlord-after-leaving-bad-reviews-on-google.html>.

¹¹⁷ "Conestoga Strategic Plan 2021-2024" (Conestoga College), accessed September 1, 2021,

<https://cms.conestogac.on.ca/sites/www/Shared%20Documents/strategic-plan/conestoga-strategic-plan-2021-24.pdf>.

¹¹⁸ Conestoga Students Inc., "CSI Year End Survey: Your Feedback, Your Experience, Our Priorities," 82.

“Conestoga will welcome record numbers of international students to all campuses for the Winter 2022 term. With current rental vacancy rates low in all areas, the international office hopes the Conestoga community, as well as your friends and neighbors, will be able to help. Visit All Things Conestoga to learn more about renting space to a student...”¹¹⁹

It is a disappointing attempt by Conestoga College to house their students, whose tuition revenue provided them with a budgetary surplus amid a pandemic.¹²⁰ The college's actions are actively putting students in precarious housing situations and is a negligent and harmful act. Further, it speaks to an institutional housing strategy, or lack thereof, that explicitly states, “It is the responsibility of the student to secure accommodation arrangements for themselves (and budget appropriately for the local cost of accommodations).”¹²¹

BEST PRACTICES

Best Practice 1: Comprehensive Housing Resources

The absence of easily accessible, cohesive, and equitable housing supports for all students at Conestoga College, apart from resources tailored only to international students, contrasts with many existing best practices at other Ontario PSIs. For example, Brock University has created a one-stop information hub website for all students to learn about living in the Niagara Region, their responsibilities as tenants, the community, school resources available to them, and more.¹²² Additionally, the website acts as a listing site, housing local housing listings on the home page, with links for landlords to list their properties directly through the off-campus living site. Students are also provided information on vetting possible rentals, practicing safe housing searches, tips on living with roommates, ways to contribute to their local communities, and more.¹²³ Brock also offers dedicated and in-depth resources for landlords and community residents renting to or living in the neighbourhood with students. These resources include basic demographic information about Brock's student population for property owners wishing to rent and ways to build positive relationships with students for neighbours of student residents.

The University of Toronto (U of T) also provides students with an in-depth, immersive housing education and resource hub, available and marketed to all students. In particular, the U of T's URent program, offered to all undergraduate and graduate students at U of T, is of note.

¹¹⁹ Conestoga College Institute of Technology and Advanced Learning Communications, “Monday Message Board for Employees Week of December 6,” Email, December 6, 2021.

¹²⁰ “Conestoga College Forges Ahead with Ambitious Expansion Plans,” [therecord.com](https://www.therecord.com/news/waterloo-region/2021/07/16/conestoga-college-forges-ahead-with-ambitious-expansion-plans.html), July 16, 2021, <https://www.therecord.com/news/waterloo-region/2021/07/16/conestoga-college-forges-ahead-with-ambitious-expansion-plans.html>.

¹²¹ “Housing | International | Conestoga College.”

¹²² Brock University Housing Services, “Resources.”

¹²³ “Resources: Students,” Brock Off Campus Living, accessed March 21, 2022, <https://brockocl.ca/resources/students/>.

The URent program seeks to empower and educate students as tenants through events and workshops. Students learn to find safe and affordable rentals, resolve conflicts with roommates and neighbours, and more.¹²⁴

The URent program includes:

- URent: Finding a Place Workshops
- URent: Housing Module
- URent: Renting Ask-Us-Anything Drop-in
- URent: Tenant Topics Workshops

U of T also provides a housing listing service tailored for students, listing accommodations for students listed by landlords who use the institution's listing service directly. Included on the listing page is a comprehensive resource page for students who are searching for housing, including information and resources for:

- Living Costs
- Apartment Viewing Checklist
- Landlord Q&A
- Roommate Compatibility Checklist
- Roommate Agreement
- Ontario Standard Lease Form
- Information on tenant's insurance¹²⁵
- Links to RentTO
- Rent Increase Guidelines
- Financial Planning Calculators,
- FAQs, and more.

The services of the institutions above represent PSIs who take responsibility for student housing and meaningfully work to equip all students with the tools and resources they will need to rent in the private housing market while working to limit their built-in vulnerabilities as students.

Best Practice 2: Comprehensive Municipal Rental Licensing Programs

Rental licensing programs are an effective and comprehensive tool by municipalities to preemptively ensure that all units available for rent in their jurisdiction are to health and safety standards. In these programs, the burden is not on prospective renters but on the municipality and property owner to ensure that any unit meeting the licensing criteria available for rent is safe for occupation.

¹²⁴ "URent," *UofT Student Life* (blog), accessed December 14, 2021, <https://studentlife.utoronto.ca/program/urent/>.

¹²⁵ "University of Toronto Off-Campus Housing Search," University of Toronto Off-Campus Housing Search, accessed December 14, 2021, <http://offcampushousing.utoronto.ca>.

According to a 2011 report prepared by the City of Hamilton in considering a comprehensive rental licensing program, proactive bylaw enforcement is critical to effectively regulate rental housing, especially for the larger multi-residential units (i.e., seven or more units). According to the report, proactive enforcement has “had success in dealing with numerous problems in the interior common areas and exterior of the multi-residential buildings/properties.”¹²⁶

As an example, the City of London, Ontario, is currently considering implementing a rental licensing structure that calls for “:

- a.) All new and existing rental units be licensed, regardless of the type of unit;
- b) Random inspections of rental units and buildings be undertaken to ensure compliance with the City’s Property Standards Bylaw and other regulations to prevent the deterioration and disrepair of rental units; and,
- c) An anonymous complaint reporting system to prevent retaliation for those launching the complaint.”¹²⁷

This system would require “yearly ‘audits’” wherein “city hall officials check out common spaces, laundry rooms, or a sampling of units in larger buildings, not a fully-fledged inspection of each apartment.”¹²⁸ The results of these audits would be published in an accessible online format for prospective tenants to be able to refer to and reference in their housing search.¹²⁹

This program is similar in structure (although more expansive in reach¹³⁰) than programs in the City of Toronto or the City of Waterloo; however, these programs have limitations on the kinds of rental properties required to seek to license within their jurisdictions. These limitations create loopholes and oversights that often leave a portion of renters without the protections afforded in a licensing structure. While a comprehensive licensing system can do more to *ensure* tenant safety, it is without question that even a moderate licensing system leaves tenants with more protections than they had previously.

¹²⁶ Tim McCabe, “Rental Housing Licensing Model (PED10049(j)) (City Wide)” (City of Hamilton: Planning and Economic Development Department, December 11, 2012), <http://www2.hamilton.ca/NR/rdonlyres/63327BE5-71D5-4E3F-83B5-DB7CBAD2C753/0/Dec11Item61.pdf>.

¹²⁷ Councillor A. Kayabaga and Councillor M. Salih, “Rental Licensing in London,” February 8, 2021, accessed August 8, 2021, <https://pub-london.escribemeetings.com/filestream.ashx?DocumentId=77991>.

¹²⁸ “Licensing All Rental Units in London Too Costly, Not Needed: City Staff,” Ifpress, accessed February 17, 2022, <https://ifpress.com/news/local-news/licensing-all-rental-units-in-london-too-costly-not-needed-city-staff>.

¹²⁹ “Licensing All Rental Units in London Too Costly, Not Needed.”

¹³⁰ Whereas the City of London creates a licensing structure that would require *all* rental housing in the London area to be accompanied by a license, the City of Toronto’s RentSafeTO program only requires landlords register (a sidestep of licensing) for rental housing in rental apartment building with three or more storeys and 10 or more units.

Best Practice 3: Landlord Certification Program

While rental licensing regimes may run up against heightened opposition by landlords and other stakeholders, there are similar, yet less invasive, programs to track properties for rent and keep prospective tenants informed. The Landlord Certification project in Montreal aims to reduce the risks to tenants of renoviction practices and predatory rent increases by creating a public, accessible tracking system of properties registered through the project. To quote the news release accompanying the program's announcement:

“The city will now require owners of buildings with eight or more units to obtain proof of proper maintenance of their building. The proposal calls for this evidence to be submitted to the city every five years, along with a maintenance plan and corrective actions, if required. Landlords will also be required to provide the rental rates for each unit, as this information is necessary to obtain certification. The rental amounts, as well as the certification status, will be publicly available on an easy-to-access and user-friendly website. This will give Montrealers access to more information about the City's rental stock.”¹³¹

With a projected rollout in 2023, the project has not yet been implemented; therefore, no measurable effects of this policy will be known for some time. Nevertheless, while not as comprehensive as some licensing programs, the City of Montreal program should ensure residents have access to the resources and information about prospective lodging to reduce further tenant exploitation. Attempts by municipalities like Montreal to ensure transparency and accountability in the rental market are worth praising.

Best Practice 4: Bristol Student Union Property Management

In place of having students live in accommodations managed by private property management companies, which may not be attuned to a student population's unique circumstances and needs, Bristol Student Union's Letting program resolves that tension by managing properties themselves. The Lettings program, introduced in 2013, was an initiative by Bristol University in the United Kingdom's student union to attempt to reduce the cost of housing for students. They have done so while also financing future property purchases, including the Launchpad program. The Launchpad program is a modular home affordable housing community owned and operated by Bristol's Student Union, offering accommodation to “University of Bristol students, young people who have been at risk of homelessness, and Key Workers.”¹³²

¹³¹ “Montréal Dévoile Son Projet de Certification de Propriétaire...,” Project Montreal, accessed February 17, 2022, <https://projetmontreal.org/en/news/montréal-dévoile-son-projet-de-certification-de-propiétaire-responsable-pour-mieux-protéger-les-locataires>.

¹³² “Launch Pad - Bristol SU Lettings,” accessed February 22, 2022, <https://www.bristolsulettings.co.uk/launch-pad>.

SUPPORTING AND ADDRESSING THE STUDENT HOUSING EXPERIENCE ///

The Letting program has dedicated staff hired by the student union to operate a property management business.¹³³ The Lettings program also assists students and prospective tenants find lodging while offering below-market rates for property management services to landlords and developers while leveraging their access to a student population in need of housing and offering customized management services.¹³⁴

¹³³ “Our Story - Bristol SU Lettings,” accessed February 22, 2022, <https://www.bristolsulettings.co.uk/our-story>.

¹³⁴ “Landlords - Bristol SU Lettings,” accessed February 22, 2022, <https://www.bristolsulettings.co.uk/services/landlords>; “Tenants - Bristol SU Lettings,” accessed February 22, 2022, <https://www.bristolsulettings.co.uk/services/tenants>.

THEME 2: HOUSING UNAVAILABILITY

Students surveyed as part of CSI's two housing inquiries and participated in a CSI housing focus group recounted confronting the sobering reality that accommodations in their respective campus communities were unavailable. The CSI Advocacy Team heard time and time again from students that they have been forced to live in municipalities far away from their Conestoga campus. Students in our focus groups studying at Doon Campus lived in Brampton and commuted; others attending Conestoga's Brantford campus lived in Etobicoke and stressed the return to on-campus learning.¹³⁵ Some of this can be attributed to the realities of a remote learning environment; still, students were adamant they had attempted to find accommodations close to campus, to no avail. For those students who could find lodging in campus communities, these accommodations were often unsafe, crowded, and illegal.¹³⁶ Students reported living in housing with up to 14 roommates in 5 separate rooms or finding lodging through room rentals posted on social media groups.¹³⁷

Through UTILE's 2021 Flash Housing Survey, CSI learned that while students ranked having accommodations close to campus as one of their main housing priorities, it was also one of the dimensions of their housing experience that they found most dissatisfactory.¹³⁸ This constraint on the availability of housing in Conestoga campus communities has placed enormous strain on students who will be required to return to campus in the coming semesters without a plan to ensure Conestoga College appropriately houses them.¹³⁹ These students now have jobs, friends, and community networks in their adopted communities away from campus. With the return to on-campus learning, they will have to commute untenable distances to attend class or give up their jobs, family, and community. The constraints and pressures of housing unavailability have strained students' mental health, as 65% of Conestoga students who responded to the 2021 Flash Housing Survey responded that their housing situation has negatively affected their mental health.¹⁴⁰ In coming to understand how students are being affected by the lack of housing availability, CSI recognizes the need to understand the factors contributing to this housing squeeze so that we can begin to advocate for the change needed to help our students.

PROBLEM 1: ZONING POLICIES THAT CONTRIBUTE TO HOUSING CONSTRAINTS

The criteria that inform decisions by policymakers, public officials, and city employees to designate certain portions of available land for certain forms of development rest on

¹³⁵ Anonymous, Housing Focus Group: Conestoga Students Attending Downtown Kitchener Campuses.

¹³⁶ Anonymous, Housing Focus Group: Conestoga Students Attending Waterloo Campuses.

¹³⁷ Anonymous, Housing Focus Group: Conestoga Students Attending Brantford Campuses.

¹³⁸ Conestoga Students Inc., "UTILE 2021 Flash Housing Survey."

¹³⁹ Conestoga College Institute of Technology and Advanced Learning Communications, "Monday Message Board for Employees Week of December 6," December 6, 2021.

¹⁴⁰ Conestoga Students Inc., "UTILE 2021 Flash Housing Survey."

municipal and provincial regulations known as “zoning” laws. Zoning is how governments determine what can be built on any portion of land under their jurisdiction.¹⁴¹ For example, governments can designate a neighbourhood or area as commercial, industrial, or residential and only permit development of a kind in the designated area. Naturally, the way a government chooses to zone land affects the price, availability, and type of housing stock in a neighbourhood subject to specific zoning regulations. This is the case in many neighbourhoods and communities Conestoga College campuses and students call home. Therefore, how a neighbourhood is zoned has enormous impacts on students' educational experience.



Allow Lodging Houses

Lodging houses are not permitted in R-3 Zone, unless specifically authorized on a property. Lodging houses are, however, permitted in the R-6 Zone in most parts of the City, except Lower Doon.

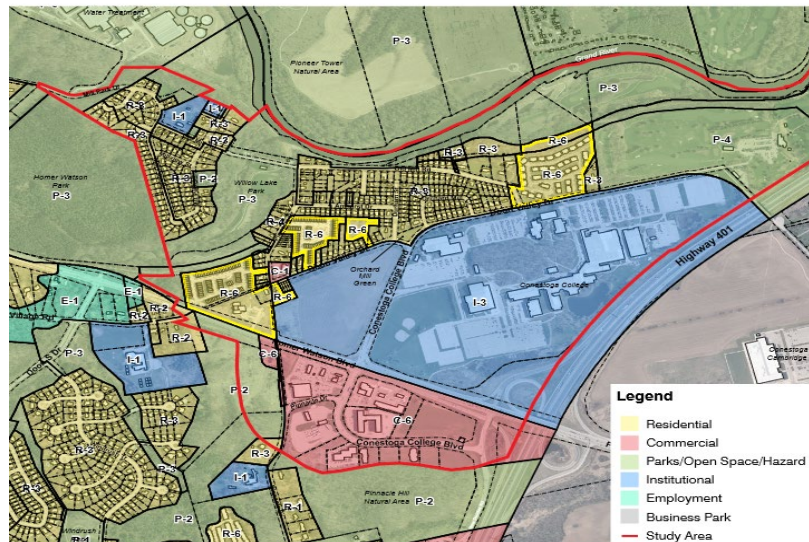


Figure 1 - Bray Heritage. “Lower Doon Land Use Study Final Report.” Final Report. City of Kitchener: City Council, March 9, 2021. https://www.kitchener.ca/en/resourcesGeneral/Documents/DSD_PLAN_2177_Lower_Doon_Report.pdf.

The availability of safe, affordable housing for students is directly impacted by policymakers' choices when creating zoning designations. Conestoga students are directly affected by the zoning restrictions present in the Lower Doon area of Kitchener, the neighbourhood surrounding Conestoga College’s Doon campus. Being the community where Conestoga’s main campus is embedded, students often seek lodging accommodations in the Lower Doon area. However, the City of Kitchener’s existing zoning regulations artificially limits housing stock availability in Lower Doon, in practice known as “people zoning.”¹⁴² Lower Doon is people zoned by implementing minimum separation distances for lodging homes.¹⁴³ The addition of these kinds of accommodations to the housing stock in Lower Doon would assist in creating more significant available housing in the Lower Doon neighbourhood for Conestoga’s student population. However, through the City of Kitchener’s existing zoning regulations, only one (1) lodging home can be built in any given 400-meter radius. This limitation effectively closes off the possibility of more than one (1) or two (2) lodging or group homes in the Lower Doon area, limiting accommodations in the area to single-family

¹⁴¹ “What Is Zoning,” accessed November 30, 2021, https://people.uwec.edu/ivogeler/w270/what_is_zoning.htm.

¹⁴² “In the Zone: Housing, Human Rights and Municipal Planning | Ontario Human Rights Commission,” 10/11, accessed November 30, 2021, <http://www.ohrc.on.ca/en/zone-housing-human-rights-and-municipal-planning>.

¹⁴³ Lodging Homes are a form of housing that contains one or more units designed to accommodate four or more residents exclusive of the owner or primary occupant.

homes. A review of the map of Lower Doon (Figure 1), published in the Lower Doon Land Use Study commissioned by the City of Kitchener, highlights the artificially zoned availability of housing stock in the Lower Doon neighbourhood. The map shows lodging homes are effectively “zoned” out of Lower Doon. This is a policy choice by city officials, one they seek to correct as outlined in the Lower Doon Land Use Study recommendations. According to the recommendations outlined in the Lower Doon Land Use Study and accepted by Kitchener City Council, the City of Kitchener plans to remove the minimum distance requirements for lodging homes, as well as delete section 15.D.12.16 of the City of Kitchener’s Official Plan,¹⁴⁴ which prohibits duplex dwellings in the City of Kitchener, as well as additional dwelling units in semi-detached houses. The collection of recommendations included in the City of Kitchener’s report are welcomed as essential amendments to existing bylaws and the city’s official plan to diversify the housing stock and open new housing options to a wider array of citizens, including Conestoga students. However, the ability to zone for diversity in housing stock does not necessarily guarantee affordability in any number of new units.

While cities can zone for types of properties that can make a neighbourhood’s available lodging diverse by sort, there are forms of zoning that intentionally set affordability requirements for any future residential developments on a plot of land or residential zone. The practice, known as inclusionary zoning, allows municipalities to require affordable housing units (“AHUs”) to be provided in new residential development projects. Municipalities can anchor the approval of new development projects proposed by private developers to a certain percentage of the housing stock being created, having to meet markers of affordability.¹⁴⁵

However, provincial legislation superficially limits municipalities to implement inclusionary zones. The PC Ontario Government’s 2019 More Homes, More Choice Act made several changes to Ontario’s Planning Act, including significant changes restricting the use of inclusionary zoning. Under the new provisions, municipalities are now only able to apply inclusionary zoning policies in two specific types of areas:

- A protected major transit station area; and
- An area subject to the developmental permit system

This internal limitation on the availability of inclusionary zoning policies has significant drawbacks on the proliferation of affordable housing stock in each municipality. Studies show that limiting inclusionary zoning to specific parcels - as opposed to policies applied to an entire city - limits the efficacy of inclusionary zoning policies by severely limiting affordable housing stock.¹⁴⁶ These kinds of targeted zoning changes generally have little

¹⁴⁴ Bray Heritage, “Lower Doon Land Use Study Final Report,” 46.

¹⁴⁵ In Canada, housing is considered “affordable” if it costs less than 30% of a household’s before-tax income. This marker for a municipality would be tied to the median income of the Waterloo Region.

¹⁴⁶ “Does Upzoning Boost the Housing Supply and Lower Prices? Maybe Not.,” *Bloomberg.Com*, January 31, 2019, <https://www.bloomberg.com/news/articles/2019-01-31/zoning-reform-isn-t-a-silver-bullet-for-u-s-housing>.

effect on housing prices,¹⁴⁷ and therefore, their claims to affordability are weakened. The artificial limit of inclusionary zoning to the areas listed above does not seek to solve the problems endemic to the housing market. Currently, artificial limitations to inclusionary zoning policies have effectively stifled the ability of all Conestoga campus municipalities to enact sweeping affordable housing-centred zoning policies, thereby limiting the availability of affordable housing options for Conestoga students. While the City of Kitchener has introduced inclusionary zoning measures, passing a motion in October of 2020 as part of the city's more extensive "Housing for All" housing affordability strategy, the effects of this change have yet to come to fruition.¹⁴⁸

PROBLEM 2: LIMITED ON-CAMPUS HOUSING OPTIONS FOR STUDENTS

The modern history of the government of Ontario's involvement in student housing can be situated in the 1960s, at the founding of the Ontario Student Housing Corporation, the postsecondary equivalent of the Ontario Housing Corporation.¹⁴⁹ The Ontario Housing Corporation built, owned, and provided subsidized rental housing to families and senior citizens through a network of regional local housing authorities;¹⁵⁰ the Ontario Student Housing Corporation sought to do the same, its purview being the provision of student housing in Ontario. This program was responsible for several postsecondary student accommodations, including a \$30 million student residence at the University of Guelph.¹⁵¹ However, since the absorption of the Ontario Student Housing Corporation into the Ontario Housing Corporation in 1978, there has been no provincial government body dedicated to building on-campus student housing. Since then, the availability of on-campus student housing has been subject to the funding commitments of Ontario postsecondary institutions themselves

According to the student housing advocacy group HOUSE, the financialization of postsecondary education has coincided with the collapse of the on-campus student housing

¹⁴⁷ "Does Upzoning Boost the Housing Supply and Lower Prices?"; "Zoning Reform Is the First Step to More Affordable Housing," *Bloomberg.Com*, February 5, 2019, <https://www.bloomberg.com/news/articles/2019-02-05/why-that-new-zoning-study-shouldn-t-deter-yimbys>. In the articles referenced, the authors suggest *only* when inclusionary zoning is implemented on a broad, municipality wide scale can such policies have positive impacts on affordability.

¹⁴⁸ "Kitchener City Council Passes a Motion Regarding Inclusionary Zoning - CityNews Kitchener," accessed February 17, 2022, <https://kitchener.citynews.ca/local-news/kitchener-city-council-passes-a-motion-regarding-inclusionary-zoning-2770472>.

¹⁴⁹ Ontario Government Agency History, "Ontario Housing Corporation," Archives Descriptive Database, accessed February 15, 2022, http://ao.minisisinc.com/scripts/mwimain.dll/144/ARCH_AUTHORITY/AUTH_DESC_DET_REP/SISN%204060?SESSI_ONSEARCH.

¹⁵⁰ Ontario Government Agency History.

¹⁵¹ Central Mortgage and Housing Corporation, "Central Mortgage and Housing Corporation: 21st Annual Report, 1966," Annual Report (Central Mortgage and Housing Corporation, 1966), 18, <https://digital.library.mcgill.ca/hrcorpreports/pdfs/6/632101.pdf>.

supply.¹⁵² As enrollment in Ontario postsecondary institutions explode with an influx of international students¹⁵³ and the private housing market continues down a track of further financialization and pricing growth¹⁵⁴, the availability of affordable, on-campus student housing has evaporated.¹⁵⁵ As students, domestic and international, are left without on-campus options for accommodations, they are forced into a private market that has increasingly sought to exploit and profit off students left behind in the wake of provincial funding cuts.

These circumstances have undoubtedly been the case for Conestoga College students, not just in Kitchener-Waterloo. Conestoga's residence was privately built in 1993 with 230 beds to accommodate approximately 4,500 full-time students attending all Conestoga College campuses¹⁵⁶ with an addition added in 2002 with an additional 230 units for a student population of roughly 5,700¹⁵⁷; an extra 68 beds were added shortly after. Since the latest addition, the college population has grown nearly 500%, to approximately 23,000 full-time students in the 2021 Fall semester. The increase in enrollment has not been matched with an equal apportionment of on-campus housing. In 1993, there was one bed for every 19 full-time students enrolled across all Conestoga campuses; in 2002, there was approximately one bed for every 12 full-time students. As of 2021, there is now one bed available for every 47 full-time students attending a Conestoga College campus, leaving incoming students increasingly vulnerable to the pressures and exploitation prevalent in private market student housing.

Conestoga College has taken a position of non-responsibility for student housing, explicitly stating on the college's international student housing resource page, "the college does not provide students with short-term or long-term accommodation. It is the responsibility of the student to secure accommodation arrangements for themselves (and budget appropriately for the local cost of accommodations).¹⁵⁸ Effectively, there are less than 600 beds provided by Conestoga College for all Conestoga students across all campuses, with plans to expand Conestoga's student population soon.¹⁵⁹

The absence of on-campus student housing cannot be untangled from the decline in Ontario's provincial funding for post-secondary education. As stated above, the shift from a publicly funded to a privately funded tuition model has shifted institutional incentives to

¹⁵² "HOUSE."

¹⁵³ Taskoh, "Internationalization in Canadian Higher Education Institutions."

¹⁵⁴ "The Financialised University"; Won, "Student Housing Proves to Be a Lucrative Niche for Investors."

¹⁵⁵ "HOUSE."

¹⁵⁶ "1967-1992 Conestoga College : 25 Years | Conestoga College," accessed October 18, 2021, <https://conestoga.core.ocls.ca/islandora/object/conestoga%3A6650?search=enrolment%252C%2520conestoga%2520college>.

¹⁵⁷ "Conestoga College : Full Time Post Secondary Enrolment | Conestoga College," accessed October 18, 2021, <https://conestoga.core.ocls.ca/islandora/object/conestoga%3A6362>.

¹⁵⁸ "Housing | International | Conestoga College."

¹⁵⁹ "Strategic Plan," accessed February 14, 2022, <https://www.conestogac.on.ca/about/corporate-information/strategic-plan>.

profit-seeking, both for the institutions themselves and as vehicles for profit for capital at large.¹⁶⁰ The problem of on-campus student housing availability is one endemic to an educational funding model that places funding of postsecondary institutions in private hands. Absent a shift in funding for postsecondary institutions from the top down and a movement away from privatization, on-campus student housing may continue to decline in availability as the funding model seeks to grow enrolment exponentially. Without additional on-campus units to service an ever-expanding student population, the issues of housing availability and affordability will only be exasperated.

BEST PRACTICES

Best Practice 1: Concordia Students Union PUSH Fund//UTILE Woodnote Project

The decline of on-campus student housing is an issue that has forced students into an expensive private market, which students plainly cannot afford. Recognizing this stark housing reality, Concordia Students Union commissioned UTILE to produce a report outlining the various ways Concordia Students Union could bring affordable housing to its student population. The findings of the comprehensive report were endorsed by CSU's governing body and put to a referendum of Concordia students.¹⁶¹ Concordia and UTILE created the Popular University Student Housing (PUSH) fund with an overwhelming majority vote favouring the project. The mandate of the PUSH fund is as follows:

1. To fund the construction of affordable student housing co-ops.
2. Find other partners to participate financially and develop its financial capacity.”¹⁶²

The PUSH fund attempts to create “permanently affordable housing for students,” thereby taking “students out of the house hunting equation while leaving more rental housing stock for less ephemeral neighbourhood residents such as families.”¹⁶³ The PUSH model is a novel attempt for dedicated pool funding, expressly set aside for permanently affordable student housing builds. Utilizing funds from levies from student unions, outside investment from local partners, and government grants and loans, the PUSH fund uses a “pool model” to entice more significant investment and buy-in. As more partners invest, the pool grows, and the possible benefits are “collectivized... to maximize social impact.”¹⁶⁴

The first project to emerge from Concordia and UTILE's PUSH funding model was the Woodnote Housing Co-Operative in Montreal. The project, \$18 million in total, was funded using the pool model highlighted by PUSH. Additionally, UTILE attained \$1.85 million in funding from CSU, an additional \$2.1 million from the City of Montreal, and \$3 million from

¹⁶⁰ Revington and August, “Making a Market for Itself”; Revington and August.

¹⁶¹ “The Woodnote – Concordia Student Union.”

¹⁶² PUSH Fund, “PUSH Fund FAQ,” accessed February 17, 2022, <https://www.csu.qc.ca/wp-content/uploads/2018/01/FAQ-PUSH-Fund.pdf>.

¹⁶³ “About,” *Fonds CLÉ / PUSH Fund* (blog), accessed February 17, 2022, <http://pushfund.org/about/>.

¹⁶⁴ PUSH Fund, “PUSH Fund FAQ.”

the CMHC through the Affordable Housing Innovation and investment from the Chantier de L'Economie Sociale.¹⁶⁵

Opened in Summer 2020, the Woodnote has 144 available beds for Concordia undergraduate students, with accommodations offered at below market value rates to students.¹⁶⁶ The building is managed by a cooperative housing structure called the “Solidarity Cooperative,” wherein residents, in partnership with a non-profit property management company, are responsible for all aspects of living in the community.¹⁶⁷ There is an elected Board of Directors who help to organize and run the cooperative model. Some other noteworthy aspects of the Woodnote model are:

- Required volunteer involvement for students living in the cooperative (4 hours a semester)
- Priority is given to low-income students
- An emphasis on parity and diversity in the selection process¹⁶⁸

The model has been successful thus far, with full occupancy as of February 2022. The PUSH fund has just added the Student Society of McGill to its membership and funding base; additionally, there was an announcement of a \$20 million low-interest loan from the CMHC for the PUSH fund's next project, Rose des Vents, a 123-unit project in Montreal.¹⁶⁹

Best Practice 2: BC Student Housing Fund

When considering options available to provincial policymakers attempting to begin to resolve the problem of student housing, the example of the BC Student Housing Loan program is one of the best. The BC Student Housing Loan program effectively allows governments to shield themselves from long-term debt in financing housing supply while allowing institutions to take long-term loans. This loan scheme effectively creates a buffer between the immediate costs of building housing and the institutions that build said housing. The BC Student Housing Loan Program made a “\$450 million student-housing investment which will... allow public postsecondary institutions to borrow directly from the province to help finance an estimated 5,000 new on-campus student housing units, which previously was not permitted.”¹⁷⁰ This program has expanded the on-campus housing capacity of institutions

¹⁶⁵ “The Woodnote – Concordia Student Union.”

¹⁶⁶ “Woodnote Student Housing Co-Op Accepting New Tenants | News – The Link,” accessed February 17, 2022, <https://thelinknewspaper.ca/article/woodnote-student-housing-co-op-accepting-new-tenants>.

¹⁶⁷ “The Solidarity Cooperative – Woodnote,” accessed February 17, 2022, <http://woodnote.coop/about/cooperative/>.

¹⁶⁸ “The Solidarity Cooperative – Woodnote.”

¹⁶⁹ “123 New Units for Students in Montréal.”

¹⁷⁰ “Homes for British Columbia,” accessed October 26, 2021, <https://www.bchousing.org/projects-partners/Building-BC/homes-for-BC>.

like the University of Victoria by 25%, translating into an additional 620 student homes. It is part of the government's long-term strategy to address affordable housing.¹⁷¹

Best Practice 3: Secondary Units on Single Family Lots (Kitchener Tiny Homes)

To address the shortage of available accommodations for residents, municipalities are getting creative by adjusting their zoning bylaws to permit the construction of secondary unit structures on previously zoned single-family residential lots. The City of Kitchener, with the introduction of backyard homes and tiny houses, is one such municipality.

To increase density and intensification in residential neighbourhoods, The City of Kitchener will begin permitting property owners to construct “‘additional dwelling units’ on all low-rise properties that meet required regulations.”¹⁷² The city estimates this would make 25,000 properties across the municipality eligible to construct these additional dwelling units,¹⁷³ significantly increasing the purpose-built rental housing supply in Kitchener.

¹⁷¹ Office of the Premier, “Hundreds of New, Affordable, Student Homes Coming to UVic | BC Gov News,” November 15, 2018, <https://news.gov.bc.ca/releases/2018PREM0081-002199>.

¹⁷² “Kitchener Council Approves ‘Tiny Home’ Zoning Bylaw Amendment,” CityNews Kitchener, accessed February 22, 2022, <https://kitchener.citynews.ca/local-news/kitchener-council-approves-tiny-home-zoning-bylaw-amendment-3650990>.

¹⁷³ “Kitchener Council Approves ‘Tiny Home’ Zoning Bylaw Amendment.”

THEME 3: HOUSING UNAFFORDABILITY

Perhaps no problem is more pressing to students in their housing search than the *unaffordability* of housing. Students are experiencing this affordability crisis firsthand, according to the CSI Year-End Survey issued to Conestoga students:

- 5.81% of students surveyed do not currently have a stable place to live,
- The price of rent is the most important factor for students in seeking accommodations (74.44% rated as extremely important),
 - Rent price is the primary factor in their housing experience students are most likely to express dissatisfaction (20.85% expressed disappointment),
- Students are living with increasing numbers of roommates, with nearly 40% of students sharing what would otherwise be private accommodations (room) with other students. This is expressly against students' stated desire to be living in private accommodations.¹⁷⁴

In CSI's housing focus groups, the issue of housing affordability structured the very conversations being had. When asked to rank their priorities in searching for accommodations, students would frequently leave the price of rent out of their calculations. When CSI facilitators asked students to explain why rent was not a priority in their housing search, students consistently responded that they took the high price of accommodations for granted.¹⁷⁵ Students often accepted that they would need to sacrifice essential housing needs such as safety, privacy, or even basic amenities. To quote two students who explained their rationale to CSI,

"It's just where the market is; it's understood as part of the gamble."

"There's a way to make it cheaper if you're willing to share."¹⁷⁶

Students accept sub-standard living conditions, and it is perceived as a necessary trade-off for housing to many. This acceptance of poor conditions exposes students to predations beyond their physical accommodations since 31.35% of students who responded to CSI's year end survey reported sharing accommodations with their landlord.¹⁷⁷ Students' attestations in surveys and focus groups showed that students were largely unaware of their tenant rights and responsibilities. It is alarming that students are renting rooms in shared accommodations with their landlords in the name of affordability and therefore are unprotected by the Residential Tenancies Act. In repeatedly hearing from our students that the rent is too high, we attempt below to identify the causes of this affordability problem for Conestoga students.

¹⁷⁴ Conestoga Students Inc., "CSI Year End Survey: Your Feedback, Your Experience, Our Priorities"; Conestoga Students Inc., "UTILE 2021 Flash Housing Survey."

¹⁷⁵ Anonymous, Housing Focus Group: Conestoga Students Attending Doon Campus.

¹⁷⁶ Anonymous.

¹⁷⁷ Conestoga Students Inc., "CSI Year End Survey: Your Feedback, Your Experience, Our Priorities."

PROBLEM 1: THE FINANCIALIZATION OF PURPOSE-BUILT STUDENT ACCOMMODATIONS

Conestoga students in the Waterloo Region, and to a lesser extent Guelph, have found themselves inundated with accommodations supposedly targeted towards a student population. Privately-owned Purpose-Built Student Accommodations (PBSA's) have flooded the Waterloo Region over the past decade, marketing themselves as a luxury housing option available to Waterloo Region students.¹⁷⁸ Intimately tied to the dwindling of provincial funding for on-campus student accommodations, private PBSAs have filled a gap left by the province and institutions for student housing. However, this gap has not produced more affordable accommodations for students. It has led to PBSA's becoming an investment vehicle for sizeable corporate management firms, pension plan investment boards, and more, as private PBSA's have produced a greater return on investment than standard rental market housing. In turn, this has created a lucrative and artificially maintained housing market for investors.

Private PBSA's are priced at regional market levels. The average price of a single bedroom in an off-campus PBSA in the Waterloo Region (\$632.00) mirrors the average pricing of single bedrooms in the Lower-Doon area of Kitchener (\$609.00).¹⁷⁹ As on-campus housing alternatives dissipate or dwindle, privately owned PBSAs have grown as a share of the off-campus housing stock and continue to do so. The Waterloo Region alone has the highest percentage of privately owned PBSA in a PSE market in Canada with 10,864 beds, representing more than 30% of all PBSA in the region.¹⁸⁰ Nick Revington and Martine August, in their article *Making a Market for Itself: The Emergent Financialization of Student Housing in Canada*, highlighted the prominent financial actors in the Waterloo PBSA market. This group includes Accomod8U, which has seen heightened scrutiny in recent years due to the poor living conditions for students living in its properties¹⁸¹:

¹⁷⁸ Revington and August, "Making a Market for Itself."

¹⁷⁹ Bonard, "Student Housing Market Report - Canada," March 2021.

¹⁸⁰ Revington and August, "Making a Market for Itself," 6.

¹⁸¹ "What the Accomod8u Data Leak Shows about Student Housing | CBC News," accessed March 1, 2022, <https://www.cbc.ca/news/canada/kitchener-waterloo/cbc-explains-what-theaccommod8u-data-leak-shows-about-the-state-of-student-housing-1.5286953>.

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Company	Type	Beds
Prica Group/KW4Rent/Accommod8u	Condo & purpose-built rental	3250
Sage Living by IN8 Developments	Condo	1534
Centurion REIT^a	Purpose-built rental	1374
CSC REIT	Purpose-built rental	1371
CHC LP & AIMCO	Purpose-built rental	955
ICON by Rise Real Estate	Condo	866
Waterloo Living	Purpose-built rental	574
ASH REIT	Purpose-built rental	455
Schembri Group of Companies ^a	Purpose-built rental	454
Sivon Investments	Purpose-built rental	415
Scholar Properties^b	Condo; retained as rental	104
Other		6215

Figure 2 - Corporate and Financial Landlords, Purpose Built Student Accommodations, Waterloo¹⁸²

As these private off-campus PBSAs are investment vehicles seeking to return a profit to investors, they are unlikely to provide the affordable housing that Conestoga College students need. The work of Waterloo area academic, Nick Revington, has illustrated that the creation of submarkets of housing stock, including privately developed PBSAs, has negatively contributed to the price increases in the housing market. The high turnover of student renters provides developers with a renewable profit source year-over-year, free from the provincial protections surrounding rental price increases.

Zoning approvals for these accommodations by the City of Waterloo were passed in the hopes that it would alleviate everyday housing market pressures such as affordability, availability, and common resident complaints surrounding student renters. They have instead caused continued downstream issues.¹⁸³ It has siloed students into smaller communities, effectively isolating students from fellow residents and “intensifying the concentration of students into one area, a trend that reinforces patterns of gentrification and age segregation.”¹⁸⁴ The insertion en masse of PBSA’s in the private housing stock has not made student housing more affordable as assumed, but rather contributed to the ongoing financialization of housing stock and created a new avenue for finance to extract sustainable rents.¹⁸⁵ As Revington and August clarify, students simply do not want expensive luxury accommodations, and private builders are starting to catch on.¹⁸⁶ The absence of institutional housing supply has created a gap that private actors have used to profit, leaving students exploited and under-housed.

¹⁸² Revington and August, “Making a Market for Itself,” 12.

¹⁸³ Revington and August, 12.

¹⁸⁴ Revington and August, 12.

¹⁸⁵ Revington and August, 13.

¹⁸⁶ Revington and August, 14–16.

However, it would not be accurate to say that institutions permitting student accommodations to be built on their campuses will solve the problem of affordability. The experience of Private-Public Partnerships (3P) in student accommodations has often presented the same issues arising from private PBSAs built off-campus. The example of York University's new luxury, *on-campus* student housing complex called The Quad is proof. A partnership between York University and Forum Campus Suites - a private, for-profit developer comprised of Campus Suites and Forum Equity Partners Inc. - will eventually bring an additional 812 beds across 487 new units expressly built for students to York Universities campus. Nonetheless, this project has not begun to solve the crisis of affordability.¹⁸⁷

Only 10% of the beds available to students will be “affordable,”¹⁸⁸ with the affordability requirement only lasting 15 years. At that time, “tenants newly occupying one of the affordable rental bedroom accommodations will not be subject to restrictions by the City of Toronto.”¹⁸⁹ While the added number of beds available to students increasing is an unmitigated good, these beds do little to address affordability issues in student accommodations both in the short and long term. Insofar as students, both present and future, need reliable and sustainable access to affordable housing, public-private partnerships between PSIs and for-profit developers do not appear to meet this need.

PROBLEM 2: THE CONTINUED PRIVATIZATION AND FINANCIALIZATION OF CANADA'S HOUSING MARKET

The CMHC's current role in mortgage securitization has contributed to Canada's current shortage of affordable housing, with severely negative consequences for students. After reviewing the CMHC mandate ordered by the federal government¹⁹⁰ in the late 1980s, the CMHC receded from building and managing Canada's affordable housing stock and moved towards mortgage securitization. Continuing into the 1990s, the National Housing Act underwent several revisions, mostly changing the rules regarding mortgage regulation and

¹⁸⁷ “The Quad,” yudc, accessed February 22, 2022, <https://www.yudc.ca/the-quad>.

¹⁸⁸ There is no set affordability parameter for the Quad student housing. Instead, “The affordable rents will be based on an average rent level derived from an average rent for comparable existing student residence accommodations on the York University campus for the academic year in which the affordable rental bedroom accommodations will be occupied, adjusted further to reflect differences in lease terms and arrangements for television services in the private academic accommodations and varied by residence unit type and to reflect single or shared bedroom accommodations.” Director, Community Planning, North York District, “4700 Keele Street – The Quad Phase 2 Student Housing - Zoning By-Law Amendment – Final Report,” Report for Action (City of Toronto, December 18, 2019), 3, <https://www.toronto.ca/legdocs/mmis/2020/ey/bgrd/backgroundfile-141847.pdf>.

¹⁸⁹ Director, Community Planning, North York District, “4700 Keele Street – The Quad Phase 2 Student Housing - Zoning By-Law Amendment – Final Report,” Report for Action (City of Toronto, December 18, 2019), 3, <https://www.toronto.ca/legdocs/mmis/2020/ey/bgrd/backgroundfile-141847.pdf>.

¹⁹⁰ Alan Walks, “Canada's Housing Bubble Story: Mortgage Securitization, the State, and the Global Financial Crisis,” *International Journal of Urban and Regional Research* 38 (January 1, 2014): 263, <https://doi.org/10.1111/j.1468-2427.2012.01184.x>.

freeing up finance to invest in newly created mortgage-backed securities (MBS). Under the changes to the National Housing Act, all mortgages that met the criteria for CMHC mortgage insurance could be packaged into NHA mortgage-backed securities and sold to investors, with the principal and interest guaranteed by the Government of Canada through the CMHC. As Walks and Clifford describe,

“The federal government moved to make CMHC’s mortgage insurance operations the new centre of affordable housing provision. This process was accomplished via incremental policy reforms that turned the CMHC into a quasi-private financial institution. Key amendments to the NHA were introduced in Bill C-82 in 1992, which gave the CMHC the power to borrow and invest in capital markets on its own, restructured the Mortgage Insurance Fund (MIF) and the Mortgage-backed Securities Guarantee Fund (MBSF) in the model of a private insurance company, increased the cap on mortgage insurance, and extended payment guarantees for NHA-MBS, allowing CMHC to underwrite the expansion of the securitization program... these changes encouraged lenders to issue and then securitize mortgages.”¹⁹¹

Moreover, in 1996, the CMHC was legislated to “for-profit” operations of its mortgage-backing and ensuring programs, opening the door later for further legislation to introduce riskier lending practices at the CMHC.¹⁹² These more dangerous lending practices, characterized by the CMHC’s willingness to extend additional payment guarantees on securities based on housing loans, allowed the CMHC to develop new mortgage securitization programs and products, eventually leading to the creation of the Canada Mortgage Bond.

Mortgage Bonds are financial products designed “to squeeze further revenue out of their mortgage purchases...institutions package them up and sell them to their customers as investments. These are mortgage-backed securities. As homeowners pay back their mortgages, investors get a share of that money.”¹⁹³ Canada Mortgage Bonds, then, are the insurances of mortgages guaranteed by the CMHC. As the CMHC grants increasing numbers of mortgages with lower down payment requirement and subsequently higher penalties, the potential value of these bonds grow. Since the federal government backs nearly 100% of all mortgages issued in Canada (100% of publicly insured mortgages and 90% of private insured mortgages)¹⁹⁴, investors have no fear of default. They are guaranteed a return on their investment. This revision of the CMHC’s portfolio, in combination with the withdrawal of all levels of government from the provision of social housing - leaving the supply of housing entirely to the private market - has led to, as Walks and Clifford describe:

¹⁹¹ Walks and Clifford, “The Political Economy of Mortgage Securitization and the Neoliberalization of Housing Policy in Canada,” 1632.

¹⁹² Walks and Clifford, 1633.

¹⁹³ Clayton Jarvis, “Mortgage-Backed Securities Are the Little-Noticed Cog Keeping Canada’s Housing Market Running,” *Financial Post*, December 22, 2021, <https://financialpost.com/moneywise-pro/mortgage-backed-securities-are-the-little-noticed-cog-keeping-canadas-housing-market-running>.

¹⁹⁴ “Canada Mortgage and Housing Corporation (CMHC) Is in the News Again,” accessed March 17, 2022, <https://www.mortgagegroup.com/does-it-seem-as-if-cmhc-is-acting-anti-competitive/>.

“it would now be private investors who would supply new rental housing for lower income households (either through investment in CMBs, or by purchasing housing units to rent out), encouraged further by tax deductions for investment-property expenses. This effectively heralded the rise of the Canadian version of what Soederberg calls the ‘debtfare state’, with the federal government now backstopping a growing rentier class of individual landlords, as well as encouraging looser lending standards and the take-up of debt among homebuyers. This has been a key-factor spurring the tremendous boom in condominium development across Canadian cities that followed, as the condo units became the main private investment vehicle for absorbing the huge new supply of mortgage credit as well as meeting demand for rental housing in the absence of new state provision.”¹⁹⁵

These changes to the CMHC and the abandonment of its social housing portfolio to the provinces (where, in Ontario, it was abandoned to municipalities) allowed finance to buy up sizable portions of the Canadian housing stock through investment vehicles known as Real Estate Investment Trusts (REITs).¹⁹⁶ Benefiting from several changes to Ontario’s tenant protections, including introducing vacancy decontrol, REITs have proceeded to buy up ever-growing swaths of Ontario’s housing stock. They have begun to move into student accommodations as well.

REIT investment in student housing has exploded, particularly in the Waterloo Region, developing privately financed PBSAs.¹⁹⁷ These PBSA’s, accounting for 17,567 student beds in the Waterloo Region as of 2018, are primarily owned by REITs and other financial asset managers (including venture capital). These PBSA’s are often more defined by their luxury accommodations than their affordability: “unlike generic multi-family housing, in which financialized landlords purchase existing stock, the student sector includes new or freshly renovated ‘luxury’ developments.”¹⁹⁸ Revington and August explain, “Reduced funding for post-secondary education has created an opening for private PBSA, and state-led internationalization strategies (to drive enrolment growth) promise a source of demand. Federal legislation enabling REITs in 1993 is also a crucial state intervention to facilitate the financialization of real estate...”¹⁹⁹

As these financial vehicles' highest profits come from unit turnover, students are the new prey, thus the investment in PBSAs. But the effects of REIT’s and broader financialization

¹⁹⁵ Walks and Clifford, “The Political Economy of Mortgage Securitization and the Neoliberalization of Housing Policy in Canada,” 1633–34.

¹⁹⁶ Martine August, “Financialization of Housing from Cradle to Grave: COVID-19, Seniors’ Housing, and Multifamily Rental Housing in Canada,” *Studies in Political Economy* 102, no. 3 (September 2, 2021): 292, <https://doi.org/10.1080/07078552.2021.2000207>.

¹⁹⁷ Revington and August, “Making a Market for Itself,” 3.

¹⁹⁸ Revington and August, 8.

¹⁹⁹ Revington and August, 15.

are wide-reaching. REIT's own 20% of the senior housing stock in Canada, and that number is growing.²⁰⁰

The results of these changes to the CMHC's portfolio, and their consequences, are seen in the enormous rise in housing prices over the past decade. Average home prices in Ontario have grown 180% in the past decade, far outpacing inflation, wages, and any other tangible measure of value.²⁰¹ This price growth has been seen across Conestoga's campus communities as well: the average price of a 1-bedroom apartment in Kitchener in 2008 was \$712 with a 4.1% vacancy rate; in Guelph, it was \$766 and 4.4% vacancy; in Brantford, it was \$674 and 3% vacancy²⁰². In 2021 these prices have all skyrocketed, with vacancy collapsing: a 1-bedroom apartment in Kitchener in 2021 was priced on average at \$1,073 with a vacancy rate of 1.9%; in Guelph, it was \$1,211 with 2.4% vacancy; Brantford is priced at \$1,050 at 1.8% vacancy.²⁰³

City	Average Price of a 1-Bedroom Apartment in 2008	Average Price of a 1-Bedroom Apartment in 2021	Average 1-Bedroom Price Increase by %
Kitchener	\$712	\$1,073	50.7%
Guelph	\$766	\$1,211	58.1%
Brantford	\$674	\$1,050	55.8%

Table 2 - Increase in Average Cost of 1-Bedroom Apartment from 2008 - 2021 by City.

Conestoga College students feel the financial crunch and housing burden caused by macro-economic factors and policy decisions made before many were born. However, it is essential to remember that the very policy decisions that have created the housing crisis were just that: policy decisions. Suppose policy decisions can make the conditions of the problem. In that case, policy decisions, and advocacy to change the consensus around these decisions, can create the conditions to undo the situation.

PROBLEM 3: THE ABSENCE OF SOCIAL HOUSING INCREASES PRESSURE ON THE PRIVATE HOUSING MARKET

With the macroeconomic changes in housing policy at the federal level leading to the subsequent restructuring of the CMHC, social housing funding in Ontario was devolved to the Ontario government. This devolution has had several consequences. Primarily, the building of new social housing in Ontario has dwindled; from 1995 (when the CMHC devolved responsibility for social housing to the provinces) to 2001, no new social housing was built in Ontario.²⁰⁴

²⁰⁰ August, "Financialization of Housing from Cradle to Grave," 293.

²⁰¹ Housing Affordability Task Force, "Report of the Ontario Housing Affordability Task Force," 6.

²⁰² "Ontario — Rental Market Statistics Summary by Metropolitan Areas, Census Agglomerations and Cities," col. 2008.

²⁰³ "Ontario — Rental Market Statistics Summary by Metropolitan Areas, Census Agglomerations and Cities," col. 2020.

²⁰⁴ "A Brief History of Social Housing."

In 1998, the Ontario government devolved the responsibility for social housing further down to Ontario municipalities (who do not have the requisite tax base necessary to fund further social housing developments). As such, most of the social housing in Ontario was built before 1995, as an auditor general report found, “there are 285,000 affordable housing units in Ontario. Despite increasing demand in Ontario for social and affordable housing, only 20,000 affordable units have been built in the last two decades. We found that Ontario’s stock of affordable housing as a percentage of its total population was about 2%. In comparison, Denmark and England’s percentages were 8% and 11%.”²⁰⁵

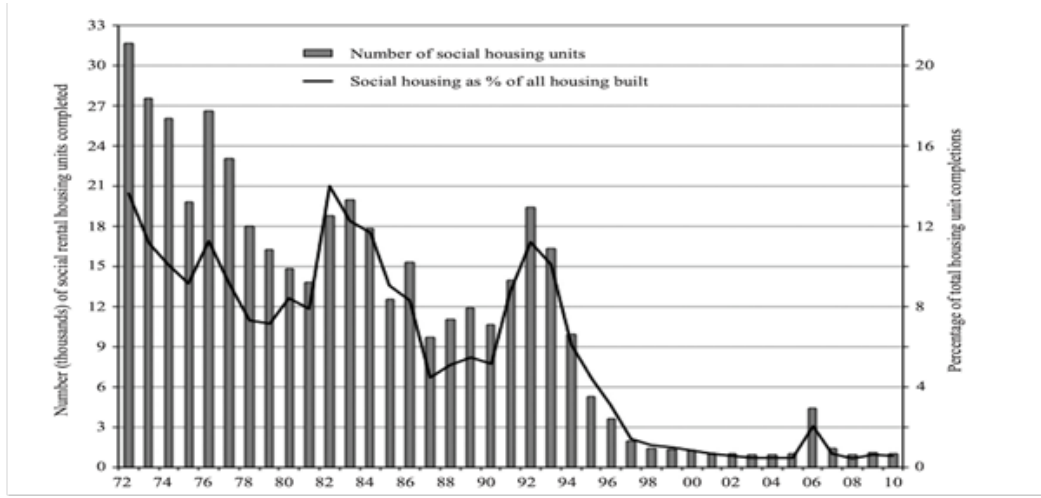


Figure 3- Social Housing Units built by year, Canada, 1972-2010

Source: Walks, Alan, and Brian Clifford. “The Political Economy of Mortgage Securitization and the Neoliberalization of Housing Policy in Canada.” *Environment and Planning A: Economy and Space* 47, no. 8 (August 1, 2015): 1624-42. <https://doi.org/10.1068/a130226p>.

The absence of a social alternative to an increasingly financialized private housing market has left millions of Ontarians, students included, in a precarious housing position. Social housing waitlists in Wellington & Brant County and Waterloo Region extend as long as 12 years and at a minimum of 2 years.²⁰⁶ As the social housing waitlist grows and the supply of social housing in Ontario diminishes,²⁰⁷ more and more Ontarians will have to rely on private market rentals. Students, domestic and international, coming to Conestoga campus communities to learn and work for the first time will be competing with an ever-rising number of residents for the small portion of affordable rentals on the private market. The alternatives are dangerous, unsafe, and exploitative for students who lose out on this competition for private legal units.

²⁰⁵ Office of the Auditor General of Ontario, “Chapter 3 Section 3.12: Social Housing,” in *2017 Annual Report*, 2nd ed. (Office of the Auditor General of Ontario, 2017), 277–91, <https://www.auditor.on.ca/en/content/annualreports/arreports/en09/312en09.pdf>.

²⁰⁶ City of Waterloo, “Housing Need and Demand Analysis”; Expositor Staff, “Long Wait for Affordable Housing,” Brantford Expositor, accessed February 22, 2022, <https://brantfordexpositor.ca/news/long-wait-for-affordable-housing>; Daniel Caudle, “Demand for Social Housing in Guelph and Wellington County Continues to Climb,” GuelphToday.com, October 13, 2021, <https://www.guelphtoday.com/local-news/demand-for-social-housing-in-guelph-and-wellington-county-continues-to-climb-4506404>.

²⁰⁷ “Our Opportunity to End Housing Poverty.”

PROBLEM 4: DECREASED FUNDING FOR POSTSECONDARY EDUCATION AND ITS CONSEQUENCES

Intimately tied to the problems of housing affordability and availability for students is the loss of provincial funding for postsecondary education. The funding of Ontario's postsecondary institutions has undergone a marked shift in the last forty (40) years. Historically, Ontario colleges were funded primarily through public funding, with the Ontario government being the primary financier and federal educational transfers assisting this public expenditure.²⁰⁸ While tuition prices have soared in the previous forty (40) years,²⁰⁹ governmental spending on students has stagnated, with federal cash transfers to the provinces for PSE declining then staying relatively dormant. Ontario FTE funding as a percentage of GDP has also barely increased (.2%) since 2002.²¹⁰

This has been a curse and a very profitable gift for Ontario colleges and Conestoga College. In 2014/15, Conestoga College received \$78.621 million in government operating grants, representing approximately 44% of their operating revenue, while generating \$52.929 million in tuition from students, or 31% of the college operating revenue. While this still represents a drastic change in funding from the highs of the late 1970s, it does represent a moderately equitable split between revenue and grants, one that still sees governments covering the plurality of Conestoga's operating budget. This funding gap has become the norm for Conestoga College and across Ontario colleges. In 2019/20, Conestoga College received a government operating grant of \$84.475 million, a 7% increase over five fiscal years that lags behind inflation, suggesting an overall decrease in expected year-over-year funding from government sources. The withdrawal of public financing can be seen across the board in Ontario colleges, as operating grants from the province to colleges have been dormant since approximately 2007, a striking decrease in expected funding. However, this operating grant decrease from the province can and has been offset several times by the *overwhelming* college revenue from tuition.

In 2019/20, Conestoga College received \$201.404 million in tuition revenue from students, a large portion of which was derived from a rapidly increasing international student

²⁰⁸ Canadian Association of University Teachers, "Federal Cash Transfers for Post-Secondary Education (% of GDP)," November 2020, <https://www.caut.ca/resources/almanac/2-canada-provinces>; Canadian Association of University Teachers, "Provincial Government Funding Per FTE Student (\$2017)" (Canadian Association of University Teachers), accessed December 8, 2021, <https://www.caut.ca/resources/almanac/2-canada-provinces>.

²⁰⁹ Canadian Federation of Students - Ontario, "The Impact of Government Underfunding on Students," July 2015, <https://cfsontario.ca/wp-content/uploads/2017/07/Factsheet-Underfunding.pdf>.

²¹⁰ Canadian Association of University Teachers, "Provincial Government Expenditure (Operating) on Post-Secondary Education (% GDP)" (Canadian Association of University Teachers), accessed December 8, 2021, <https://www.caut.ca/resources/almanac/2-canada-provinces>.

population.²¹¹ This revenue represents a 381% increase in tuition revenue in just five (5) fiscal years. This shift to a tuition funding model has placed a more significant financial burden on students and, consequently, even greater responsibility on those not from Canada. International student tuition continues to make up an ever-greater portion of Ontario college revenue. Unlike domestic students, for whom tuition increases are limited to a max of 5% per annum based on their program, the Ontario government permits an addition to international student tuition of up to 20%,²¹² incentivizing institutions like Conestoga College to seek out and drive international enrolment numbers ever higher.

The Ontario government is the country's lowest funder of FTE students, providing \$7,841 per student in funding, with no meaningful attempt to correct this inadequacy in nearly twenty (20) years. To put this funding in perspective, the next lowest funder of full-time equivalent students is British Columbia, at \$9,748. As enrollment in Ontario postsecondary institutions explode with an influx of international students²¹³ and the private housing market continues down a track of further pricing growth²¹⁴, the availability of affordable, on-campus student housing has subsequently dried up.²¹⁵

²¹¹ Conestoga College Institute of Technology and Advanced Learning, "Conestoga College 2021-2022 Business Plan" (Conestoga College Institute of Technology and Advanced Learning, August 2021), 14, <https://www-assets.conestogac.on.ca/documents/www/about/college-reports/2021-22-business-plan.pdf>.

²¹² "Tuition and Ancillary Fees Reporting Operating Procedure."

²¹³ Taskoh, "Internationalization in Canadian Higher Education Institutions."

²¹⁴ "The Financialised University"; Won, "Student Housing Proves to Be a Lucrative Niche for Investors."

²¹⁵ "HOUSE."

RECOMMENDATIONS FOR SUPPORTING AND ADDRESSING THE STUDENT HOUSING EXPERIENCE

The lived housing experiences that students have shared with us have demonstrated the need for support, change, and advocacy in the housing realm as it has a direct impact on their overall student experience, including their academic performance, health and wellness, and finances.

To address the main themes of issues identified, the following recommendations represent innovative, evidence-based solutions, and tangible actions that should be considered to address the housing crisis that has become a prominent barrier in the student housing experience.

DISCLAIMER: The following suggested recommendations are for the consideration of CSI's Executive Team and/or Board of Directors. These recommendations are not guaranteed to be adopted and/or implemented by CSI. An individual or collective action plan (such as CSI's Strategic Plan) will be created and published in the future which may or may not include these suggested recommendations.

ABSENCE OF RELIABLE HOUSING INFORMATION & RESOURCES//UNSAFE HOUSING RECOMMENDATIONS

A common issue identified across the Conestoga student population was the general lack of awareness of sources of reliable housing information to assist them in their housing experience, both institutionally and from local governing bodies. The problem of students' unfamiliarity with the resources and information available to them on their housing search²¹⁶ and their rights and responsibilities as tenants often leads to several students finding themselves in unsafe housing conditions through no fault of their own.

Students also cited several external restraints, such as a lack of credit guarantors available to international students without an existing credit history²¹⁷, exasperating an already desperate dash to find accommodations in a constrained and expensive housing market. To resolve the abundant issues of unreliable housing information and unsafe housing conditions, CSI recommends:

RECOMMENDATIONS:

1. CSI should work with local municipalities to establish connections with tenants to provide ongoing education through:
 - a. Door-to-door campaigns

²¹⁶ Anonymous, Housing Focus Group: Conestoga Students Attending Cambridge Campuses, Zoom Meeting, September 29, 2021.

²¹⁷ Anonymous, Housing Focus Group: Conestoga Students Attending Waterloo Campuses, Zoom Meeting, October 5, 2021.

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- b. Community engagement events
 - c. Online community groups/forums
 - d. Workshops
2. CSI should advocate for the creation or translation of existing tenant educational resources, available in regions and municipalities where Conestoga campuses reside, to common languages of international newcomers to ensure students and more broadly, new community members, are not left without the tools and resources for safe housing.
 3. CSI should advocate that Conestoga College provide comprehensive housing services with the following programs. If Conestoga College fails to develop these programs, CSI should explore introducing the following:
 - a. Expand the existing housing support services available to international students attending Conestoga College to include the domestic student population.
 - b. An institution-sponsored listing service, including landlord verification and 3rd party listings, like those available from Brock University's off-campus housing resource page and Queen's University's Landlord contract program.
 - c. Housing mediation services to assist landlords and tenants in amicable solutions to housing disputes before resorting to the Landlord Tenant Board or other legal action. An existing program facilitated in collaboration between the University of Western Ontario, Fanshawe College, and the City of London is a good example.
 - d. A roommate matching service to assist students in finding roommates with similar interests, hobbies, and backgrounds. The Find a Roommate program at the University of Toronto is an excellent example of an existing program.
 - e. Peer-to-peer housing supports that include a mediated online message board (Quora by Conestoga).
 - f. Interactive housing and scam prevention education modules that are available at all times in a centralized online location.
 - g. A comprehensive off-campus living transition program similar to Wilfrid Laurier University's LOCUS program, that includes off-campus community advisors and step-by-step aid for transitioning into private market housing for students who are:
 - a. Incoming students living off-campus
 - b. Students who previously lived in on-campus residence
 - h. An off-campus student housing newsletter to keep students aware of common issues and newsworthy changes in the private rental market, as well as news on campus.
 - i. Education for landlords on student-specific issues similar to the University of Western Ontario's Off-Campus newsletter.

- j. Lease and rental agreement reviews for students who will be renting to ensure students understand their responsibilities of their lease agreement and are not signing non-standard or illegal leases.
 - k. Housing fairs to bridge connections and establish positive relationships between landlords and students.
4. CSI should advocate for the creation of a Housing Services Student Advisory Committee for students to provide CSI and Conestoga College with advice about programming, services, policies, and initiatives for student housing.
5. CSI and/or Conestoga College should explore the possibility of arranging short-term temporary housing.
 - a. This program could include the creation of a joint emergency housing fund that provides up to 7 days of emergency housing for students in desperate housing need.
6. CSI should explore the potential of being a guarantor for students who do not have access to one during their housing search.
7. CSI should advocate that international recruiters contracted by Conestoga College provide students with accurate appraisals of the costs of living in Conestoga campus communities, ensuring students are prepared for their student experience expenses before arriving in the country. Per the 3rd recommendation of the report of the Auditor General of Ontario on Public Colleges, CSI should advocate for the Ministry of Colleges and Universities to:
 - a. “confirm that public colleges have a formal policy for the selection and removal of international student recruitment agencies;
 - b. require public colleges to monitor the agencies’ advertisements at a regular interval (between three and six months) to confirm they are factually correct, and that any errors or other misleading advertisements found are corrected in a timely manner; and
 - c. collect data related to fees paid to recruitment agencies, and assess the reasonableness of the fees paid on a per-student basis.”
8. CSI should advocate for the province to expand the Residential Tenancies Act to include room renters in the protections provided to tenants.
9. In the absence of provincial protections for tenants in room rentals and shared accommodations with their landlords, CSI should explore the opportunity to facilitate a room rental program similar to Homestay. This program would provide protections to students renting rooms in Conestoga communities and from faculty and staff employed by Conestoga College.
10. CSI should create a drafted contract/lease form that tenants could use to ensure their room rental affords them protections not offered by the province. Queens

University offers a Roomers and Boarders agreement that could be emulated.

11. CSI should determine if the CSI Legal Protection Program provides support for students not covered by the Residential Tenancies Act (room rentals or shared accommodations) and, if it does not, advocate to StudentCare for the inclusion of such housing-related coverage for room rentals.
12. CSI should advocate for Landlord Tenant Board (LTB) fees to be waived for low-income tenants' LTB filings.
13. CSI should explore providing grants to students who need to file with the LTB if the CSI Legal Protection Program does not cover their case, until fees are waived for low-income tenants.
14. CSI should advocate that Conestoga College campus municipalities adopt a comprehensive rental licensing program that includes:
 - a. A pre-emptive and intermittent/randomized inspection program, with an incentive structure attached to landlords who successfully pass several inspections in a row.
 - b. An anonymous complaint structure that triggers inspections (anonymous complaints must be tied to a program with random reviews).
 - c. Incentives: these can include a reduced licensing fee for landlords or licensing fees waived for periods (renew license bi-annually as opposed to annually).
 - d. An educational program geared towards tenants to ensure they are aware of standard rental unit issues and their rights and responsibilities.
 - e. Measures to ensure the program is revenue neutral; this is to ensure all costs are justified through the actions of the bylaw staff, and the program maintains an image of fairness amongst property owners.
 - f. A comprehensive license suspension process that protects tenants in the act of license revocation through constant updates with tenants in "at-risk" buildings and transition housing provided to tenants in suspended units.
15. As a secondary solution to Recommendation 14, CSI should advocate for a landlord/unit registry and certification program, similar to the Landlord Certification program introduced in Montreal.
16. CSI should explore the creation of a property management division of CSSI, similar to the program modelled by the Bristol Students Union's Letting Program that puts the management of community properties into the hands of the student association to ensure housing is safe, accessible, and tenants are treated properly.
17. CSI should explore introducing a partnership with insurance companies to provide tenant insurance discounts for Conestoga students.

HOUSING UNAVAILABILITY RECOMMENDATIONS

Through student consultations, students repeatedly recounted confronting the sobering reality that accommodations in their respective campus communities were unavailable. Students often shared their experience living and working in one community, often in the GTA, and attending class in another²¹⁸.

Some of this can be attributed to the realities of a remote learning environment; nonetheless, students were adamant they had attempted to find accommodations close to campus, to no avail. For those students who could find lodging in campus communities, these accommodations were often unsafe, crowded, and illegal.²¹⁹ Low vacancy rates in the private rental market, accompanied by either limited (for students at Conestoga's Doon or Cambridge campus) or non-existent on-campus housing, have left students spreading their housing search far beyond their campus community. To help resolve the issue of housing unavailability, CSI recommends:

RECOMMENDATIONS:

18.CSI should advocate to the provincial government for funding for not-for-profits or post-secondary institutions to build culturally appropriate and diverse types of Purpose-Built Student Accommodations (PBSA) offered at below-market rates.

- d. PBSAs need to reflect the growing diversity of student populations, including growing numbers of international students, mature students, and other diverse student groups.
- e. To facilitate PSIs building of on-campus student accommodations, CSI should advocate for the Ontario government to introduce a similar program to the British Columbia Student Housing Fund.
- f. To ensure PSIs receive the proper funding to accommodate growing student populations and provide the housing student populations need, CSI should continue to advocate for increased provincial and federal funding for post-secondary education. CSI should advocate for the Ontario government to return to a publicly funded college model versus an overly reliant model on student-financed tuition.
 - i. This advocacy includes making specific asks of the government to adjust funding levels. CSI should advocate for the Ontario government to return FTE domestic student funding for colleges to the tuition to grant funding ratios seen in the early 2000s, wherein the province accounted for 65% of college revenues and tie this funding to inflation.

19.CSI should advocate for regional governments where Conestoga campuses reside to set aside a portion of their affordable housing stock for student tenants. A

²¹⁸ Anonymous, Housing Focus Group: Conestoga Students Attending Downtown Kitchener Campuses, Zoom Meeting, October 7, 2021.

²¹⁹ Anonymous, Housing Focus Group: Conestoga Students Attending Waterloo Campuses.

similar program is currently operating with City Housing Hamilton, Hamilton's social housing corporation. The 191 Main Street West, Hamilton property operated by City Housing is:

- a. Social housing available for students,
 - b. Owned and operated by the City of Hamilton,
 - c. All self-contained bachelor units inclusive of heat/hydro,
 - d. Must be a full-time student at Mohawk College or McMaster University.
20. CSI should explore innovative and emerging housing models for developing long-term affordable and sustainable PBSAs for Conestoga students present and future through partnerships with not-for-profit housing suppliers such as HOUSE.
- e. CSI should explore hiring HOUSE's team as a consultant to examine the possibility of providing PBSAs.
21. CSI should advocate for lodging homes to be expanded as of right in all Conestoga campus communities, to expand the available housing options for students, and ensure students have access to safe, affordable accommodations.
22. CSI should advocate for municipal governments to permit the building of secondary units on existing single-family residential zoned properties; the City of Kitchener's Backyard Homes and Tiny Houses zoning bylaw is an excellent example for other municipalities to mirror.

HOUSING UNAFFORDABILITY RECOMMENDATIONS

Perhaps no problem is more pressing to students in their housing search than the *unaffordability* of their housing. Rental prices have risen dramatically over the past decade, vastly outpacing the growth rate for wages, leaving residents without the means to afford these price hikes.²²⁰ Students are incredibly aware of this problem and are experiencing this affordability crisis firsthand. According to the CSI Year-End Survey issued to Conestoga students:

- 5.81% of students surveyed do not currently have a stable place to live,
- The price of rent is the most critical factor for students in seeking accommodations (74.44% rated as extremely important),
 - Rent price is the primary factor in their housing experience students are most likely to express dissatisfaction (20.85% expressed disappointment),
- Students live with increasing numbers of roommates, with nearly 40% of students sharing what would otherwise be private accommodations (room) with other

²²⁰ Spencer Turcotte et al., "'It Is High': Kitchener Rental Prices Outpacing Average Income, Officials Say," Kitchener, August 27, 2021, <https://kitchener.ctvnews.ca/it-is-high-kitchener-rental-prices-outpacing-average-income-officials-say-1.5564155>.

students. This is expressly against students' stated desire to be living in private accommodations.²²¹

Students are increasingly accepting sub-standard living conditions, as it's perceived as a necessary trade-off to secure housing. As prices continue to climb unabated, students are left with no reasonable housing accommodations and many bad choices. To help resolve the problem of housing unaffordability, CSI recommends:

RECOMMENDATIONS:

23. CSI should advocate for the introduction of student housing financial supports; potential options include:

- a. Financial support akin to the program present at the University of British Columbia. The UBC program requires students to be full-time and receive the maximum government funding available through Canada Student Grants and Loans.²²²
 - a. Students at UBC are eligible to receive a total of funding of up to \$2200 when in UBC-managed housing.²²³ CSI supports an equivalent amount of funding to Conestoga students eligible for this program, absent the requirement for tenancy in institutional housing.
 - b. CSI should advocate for a program with no citizenship requirement, and therefore international students in demonstrated financial need should be eligible.
 - c. CSI should advocate for a program that requires students' full-time studies to extend longer than two terms or eight months.

24. CSI should advocate for the removal of vacancy decontrol in the province of Ontario through proposed legislation or potential new legislation to help address the rising cost of rental housing.

25. CSI should explore the creation of a Conestoga Students Incorporated Rent Bank

- b. Such programs already exist in municipalities across Ontario; however, none target a student population.
- c. A rent bank operation would see CSI provide funds to eligible Conestoga students who are behind on their rent or need help with a rental deposit. CSI ensures that at-risk students have the support they need to stay in their homes and prevent homelessness by providing these funds.

²²¹ Conestoga Students Inc., "CSI Year End Survey: Your Feedback, Your Experience, Our Priorities," Survey Report (Conestoga Students Incorporated, n.d.), <https://conestogastudents.com/wp-content/uploads/2022/02/CSI-Year-End-Report-Final-2021.pdf>; Conestoga Students Inc., "UTILE 2021 Flash Housing Survey," Unpublished Report (Conestoga Students Incorporated, n.d.).

²²² "Student Housing Supplement Grant," Student Services, December 14, 2016, <https://students.ubc.ca/enrolment/finances/awards-scholarships-bursaries/ubc-bursary-program/student-housing-supplement-grant>.

²²³ "Student Housing Supplement Grant."



26.CSI should advocate that Conestoga College reduce the average rent for on-campus residence to 20% below the market rate to ensure students have affordable on-campus housing options.

Together, these recommendations have the ability to positively influence the student housing experience by ensuring access to appropriate housing supports, increasing the availability of housing, and improving the affordability of housing.

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APPENDICES

FLASH SURVEY SUMMARY

FLASH 2021 SURVEY METHODOLOGY

Research Questions

The 80-question survey covered four themes of student housing inputs: student residential situation, the urban impacts of student housing, student financial situation, and student mobility.

Research Design

The survey combined open-ended questions and multiple-choice questions with non-defined answers, offering students the opportunity to provide insight into their unique experiences and rank their responses on Likert scales to illustrate their satisfaction levels and preferences about aspects of their housing experience.

For some questions, an optional space was provided for students to elaborate on their answers or provide an alternative answer to the choices listed. This open question space carries considerable value for a survey of this kind, as it contributes to improving the interpretation of overall results and provides additional valuable material for UTILE & CSI.

Instruments

The survey was housed on a standalone website developed by UTILE for the distribution of the FLASH 2021 Housing Survey (the website is no longer active as of October 2021). The survey was designed by UTILE's data & research team.

Nationally, UTILE distributed the survey to participating Student Association's (SA's) to be dispersed amongst their student membership at a period between January and April of 2021. SA's were requested to send out a minimum of three (3) emails to their student membership notifying them of the survey and any related incentives the participating SA's wished to offer. SA's were also permitted and encouraged to promote the survey through other mediums, including housing links and promotional material on their websites and social media platforms.

CSI's advocacy department, founded in March of 2021, was made aware of the UTILE Flash 2021 Housing Survey in the period where collection of survey data was being finalized by other SA's across Canada. In conversations with UTILE, CSI was able to arrange to distribute the survey amongst our student membership across four (4) weeks in April 2021. Students were notified of the survey through a scheduled email notification, in addition to marketing pushes through our social media channels, website and app.

Sample

CSI was able to solicit the response of 408 Conestoga Students of a Winter 2021 population of 17,480 students. This was sufficient for a 95% confidence interval amongst our

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responses, with a margin of error of 5%. These numbers indicate a small, but representative sample of Conestoga's student population.

Number of Students Invited	Number of Responses	Response Rate	Confidence Level	Margin of Error
17, 480	408	2.33%	95%	5%

Demographic Highlights:

Student Country of Origin	Number of Students	Percentage of Respondents
Domestic	135	34%
International	262	66%
Uncertain	3	1%

Student Gender	Number of Students	Percentage of Respondents
Female	233	57.11%
Male	162	39.71%
Trans female	2	0.49%
Trans male	3	0.74%
Two-spirit	1	0.25%
Do not know / Prefer not to answer / Blank	7	1.72%

Campus	Unofficial Campus Population (Winter 2021)	Campus Response	% Of Campus Population Responded
Conestoga College - Brantford	534	13	2.43%
Conestoga College - Cambridge Campus	2081	38	1.83%
Conestoga College - Doon Campus	11124	233	2.09%
Conestoga College - Downtown Kitchener Campus	1396	43	3.08%
Conestoga College - Guelph incl. Riverside Glen)	573	14	2.44%
Conestoga College - Waterloo Campus incl. University Gates)	2897	52	1.79%

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Conestoga College - Other/Blank/Unknown Incl. Ingersoll and Online Only	183	15	8.20%
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Data Collection

Participant’s data was collected through a standalone dedicated website www.flash2021.ca (no longer active) where students could then complete the Flash Housing Survey 2021. Students were directed to the survey link through their participating SA’s via email, social media, or the SA’s website from April 5 – 26, 2021. The survey contained over 80 questions, largely multiple choice, or, yes or no, and employed Likert scales and open-ended questions to gain more information on student’s experience.

The survey was incentivized through a \$1,000 random prize communicated as the chance to win “rent for a month” and ten \$100 grocery gift cards.

The data collected was and remains the property of UTILE, who is, “responsible for the confidentiality and encrypted storage of the central database.” As a participating student union, CSI has access to the data of our student population’s survey results in *aggregate*, maintaining the confidentiality of student respondents. All participating organizations and SA’s have been required to sign a Data Use Policy, mandating participants:

- Respect the anonymity of respondents, notably by ensuring that the data always remains aggregated;
- Ensure that the database is always accompanied by this use policy;
- Ensure that the data is stored in a secure manner at all times, with password protection;
- Apply this use policy to govern the sharing of data with partners;
- Use only the portion of the database absolutely required for their project’s purposes;
- Use the data solely for non-profit activities.

Limitations

While every reasonable effort was made to reduce limitations, the following limitations were identified:

- Time: CSI’s advocacy department was founded in March of 2021, and UTILE began soliciting the participation of SA’s in August of 2020, CSI was unable to make the proper planning preparations necessary to seek the response we would typically desire from a survey. Whereas a survey of this size and of this importance to our student membership would typically see a larger marketing rollout, including more frequent direct contacts with students, the short turnaround between learning of the survey and distributing the survey to students prevented typical actions that would engage a larger student population. Ultimately, CSI was able to gather a representative sample of students, but not at the confidence interval or margin of error we would ideally aim for. Additionally



the survey was distributed at the end of the semester in competition with student priorities of exams and final projects.

- COVID-19: The survey was administered during the COVID-19 pandemic. Responses may be influenced by the effects of the pandemic and not fully representative of the environment pre-pandemic. Although, the impact of the pandemic will most likely have a permanent impact on the housing environment and not resemble the pre-pandemic environment.

HOUSING FOCUS GROUP SUMMARY

FOCUS GROUP METHODOLOGY

Research Design

The focus groups were designed to provide additional qualitative information and context to key themes identified through the Flash 2021 Housing Survey. They also were a method to assist in understanding additional concerns of Conestoga students related to student housing that were not identified through the survey.

Instruments

Focus groups were facilitated in a virtual delivery format through the use of Zoom to respect public health guidelines and ensure accessibility for students residing outside the areas of Conestoga campuses. A total of 10 virtual focus groups were available between September 28, 2021, and October 20, 2021 targeted at all major campuses and included the participation of students from the International Student Advisory Council and Student Rep program. Each session had at least one moderator and one note taker.

Sample & Data Collection

All participants were required to be current students of Conestoga College. This criteria was facilitated by the sign-up process through the co-curricular portal which is only accessible to current Conestoga College students. No further personal information was requested from participants.

A total of 91 students participated in the focus groups including current tenants and prospective tenants. Campus specific focus groups (8) sign-ups were hosted on the co-curricular portal and advertised through the platform and all CSI channels (direct email, social media, web, app). Sign-ups for all sessions opened on Tuesday, September 14.

The remaining 6 focus groups were conducted with the Student Rep and International Student Advisory Council (ISAC) program participants.

Students who signed up to participate received a \$10 gift card to the place of their choice for participating in the discussions. Student Rep and ISAC participants were not eligible for compensation as they receive payment for attending their meetings.

CAMPUS	DATE & TIME	MODERATORS	NUMBER OF PEOPLE SIGNED UP	NUMBER OF ATTENDEES
DOON (2 SIMULTANEOUS) CAMBRIDGE	September 28 1:00PM – 2:30PM	Justin McLaughlin Cisco Watson	65	13
	September 29 1:00PM – 2:30PM	Justin McLaughlin Cisco Watson	26	3
STUDENT REP (3 SIMULTANEOUS)	October 5 12:00PM – 1:00PM	Justin McLaughlin Cisco Watson Darcee Carnes	N/A	27
WATERLOO	October 5 4:00PM – 5:30PM	Justin McLaughlin Cisco Watson	25	4

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ISAC (3 SIMULTANEOUS)	October 6 12:00PM – 1:00PM	Justin McLaughlin Cisco Watson Darcee Carnes	N/A	24
DOWNTOWN KITCHENER BRANTFORD	October 7 1:00PM – 2:30PM	Justin McLaughlin Cisco Watson	30	6
ANY CAMPUS	October 12 1:00PM – 2:30PM	Justin McLaughlin Cisco Watson	26	6
GUELPH	October 13 1:00PM – 2:30PM	Justin McLaughlin Cisco Watson	30	7
	October 14 1:00PM – 2:30PM	Justin McLaughlin Cisco Watson	13	1
TOTAL			215	91

Limitations

- **Virtual Environment:** Focus groups can be intimidating for some participants due to a variety of factors including other participant’s attitudes, or recording of the session. The flow of the focus group session was designed to allow a comfortable environment to be established and all participants were required to agree in writing to be respectful of participants. It was also encouraged to have cameras on to minimize potential distractions in the session, but it was not mandatory to ensure respect for participant’s personal preferences and environments.
- **Timing:** The timing of sessions may not have been convenient for all potential participants of the sample population.
- **COVID-19:** The focus groups were conducted during the COVID-19 pandemic. Responses may be influenced by the effects of the pandemic and not fully representative of the environment pre-pandemic. Although, the impact of the pandemic will most likely have a permanent impact on the housing environment and not resemble the pre-pandemic environment.

CSI YEAR-END SURVEY SUMMARY

2021 CSI YEAR-END SURVEY METHODOLOGY

Research Questions

The survey consisted of 140 questions covering all major CSI service areas, programming, communications, and various member priority topics such as transportation, housing, truth and reconciliation, and accountability. The housing section of the survey included 10 logic-based questions.

The survey also included demographic questions to assist in understanding the variations in responses by specific demographic factors such as age, income, race, etc.

The housing questions included were a condensed variation of the questions asked in the FLASH 2021 Housing survey.

Research Design

The survey utilized a variety of question types to most appropriately solicit member feedback. When necessary, closed-ended questions were provided an “other” option to allow members to ensure their feedback could be collected in totality. Question types included:

- Open-ended questions
- Multiple Choice
- Likert Scale
- Matrix Questions

The survey was designed as 12 sections in the following order:

- Demographics
- CSI Support Services
- Health & Wellness
- Leadership & Career Services
- Events
- Communications
- Food Services
- Employment Opportunities
- Academic Fairness
- Housing
- Transportation
- Transparency & Accountability

With a total of 140 questions, it was expected to take between 30-45 minutes for members to complete the survey. The housing section of the survey was logic-based to filter out questions for respondents who are not tenants. The housing section of the survey was expected to take between 3-5 minutes.

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Instruments

The survey was created and administered using the online SurveyMonkey platform. All data collected through SurveyMonkey is stored on servers in Canada and safeguarded in compliance with applicable legislation.

Sample

The survey was distributed to all CSI members totaling 23,408 eligible survey participants. 4,748 responses were received, with 3,130 responses in a fully completed state. This resulted in a 13.37% response rate providing a statistically representative sample of CSI members (99% confidence level with a 2% margin of error). Approximately 2,400 respondents were included in the housing questions.

Number of Students Invited	Number of Responses	Response Rate	Confidence Level	Margin of Error
23, 408	3, 130	13.37%	99%	2%

Data Collection

The survey was accessible through a URL link generated by SurveyMonkey that limited responses to one response per IP address to prevent duplicate responses. The survey was distributed using various digital channels:

- Direct email to CSI members through their Conestoga College email addresses
- Social Media
- CSI Mobile App
- CSI Website
- ZenDesk Reminders
- Targeted CSI-affiliated groups (Clubs, Student Rep, International Student Advisory Council, and Social Experience Program)

The direct email method provided assurance each CSI member would receive the survey invitation, while the remaining digital methods would act as a secondary source of data collection. Duplicate responses were further prevented by eliminating duplicate responses by verifying submitted contact information for the incentives.

The survey opened on Monday, November 8, 2021, and was scheduled to close Friday, December 3, 2021. The survey was extended to close on Monday, December 6 at 12:00am to allow members to respond during the weekend when they may have more availability to participate.

The survey was incentivized with \$15,000 of prizes given to randomly selected participants. The prizes included:

- Free tuition (\$5,000)
- Five, \$1,000 Air Canada Gift Cards
- Fifty, \$100 Gift Cards of the users choice (from www.giftcards.ca)

To facilitate the process of prizing, an optional question was provided at the end of the survey to collect Name, Student Number, and Email.

Limitations

While every reasonable effort was made to reduce limitations, the following limitations that could impact the housing questions were identified:

- Questions may be interpreted differently than the context the respondent intended it to be interpreted by.
- A demographic question identifying the respondent's campus was added to the survey late due to an administration error. Although this question was added late, 87% of respondents could still respond to this question providing a statistically significant response.
- Every effort was made to use plain English to create questions and to reduce potential comprehension barriers for members who do not identify English as their primary language.