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Digital Policy Hub

Digital Policy Hub – Working Paper

The Role of Data and AI in Canada's Housing Crisis: A Critical Overview

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Key Points

- Canada faces a housing crisis as rent and mortgage costs escalate. Substantial supply and demand gaps mean that existing unhoused and housing insecure populations could rise dramatically without intervention.
- Organizations and governments are increasingly using data and artificial intelligence (AI) in homelessness management, housing allocation and real estate markets to improve resource matching, predict trends and optimize housing support.
- While data and AI-driven practices aim to improve distributive efficiency, these technologies pose serious concerns around privacy, discrimination and bias. They reflect broader ideologies, such as technological solutionism, that disproportionately harm marginalized and vulnerable communities.
- Moreover, the real estate sector is employing data and AI in the form of "proptech" to financialize and commodify housing and renter-tenant relations. This approach reduces individuals to data points for profit maximization, reinforcing social injustices related to surveillance, sorting and classification.
- This working paper highlights the need for harmonized housing policies that materially recognize the deep and complex social, political and economic motivations behind the use of data and AI in the Canadian housing crisis, with the goal of ensuring equitable and meaningful change. These policy recommendations will be discussed in more detail in a second working paper still to come.

Introduction

Canada is in a housing crisis. With increases to the costs of renting and buying a home and a growing population, economists have estimated that Canada needs to build five million additional housing units by 2030 — on top of standard annual construction — to adequately match housing needs (Suhanic 2024). Moreover, advocates and lobbying groups have emphasized that increased housing costs disproportionately affect marginalized social groups, and particularly those who are already economically vulnerable.[1] And without intervention, Canada's homelessness population threatens to grow from 150,000–300,0000 to 550,000–570,000 by 2030.[2]

Amid these challenges, social and political actors across sectors have turned toward the use of data and AI to address Canadian homelessness, housing, and real estate policy and management. Data and AI-driven strategies are increasingly being used to match housing-insecure individuals with resources and support, screen and sort tenant applications, manage land ownership and renting services, and more (Eubanks 2018; McElroy and Vergerio 2022; Ferreri and Sanyal 2021). Yet given the high stakes of housing as a fundamental human need, the use of AI and data-driven approaches for managing this need requires careful scrutiny. Lessons from the use of AI in other contexts, such as health care and education, have taught us that while data and AI-driven tools can generate many benefits, these technologies can also

1 See www.canadahousingcrisis.com.

2 See https://homelesshub.ca/collection/homelessness-101/how-many-people-homeless-canada/.

cause serious harm. Scholars have been increasingly attentive to issues related to privacy, transparency and security in the use of these tools, as well as their potential to produce discriminatory classification, sorting and exclusion, particularly toward socially marginalized groups (Angwin et al. 2016; Barocas and Selbst 2016; Eubanks 2018; Bender et al. 2021; Tacheva and Ramasubramanian 2023; Schelenz 2022; O'Neil 2016).

As the first in a two-part series aiming toward ethical guidance for AI in Canadian housing policy, this working paper takes a critical perspective in laying out the current roles of data and AI in Canada's housing markets, policies and practices, and in discussing the purported benefits against the normative underpinnings and implications of this technology's use. It does so by analyzing two main subject areas: homelessness management and real estate systems. In each of these areas, the paper highlights the harmful role of datafied techno-solutionist policy making and the subsequent loss of opportunities for deeper structural change, thereby serving as a valuable resource for policy makers, researchers and other stakeholders seeking to critically navigate the ethical complexities of AI's integration into housing systems. Ultimately, this analysis lays the groundwork for actionable policy recommendations in the Canadian housing context, a focus that will be explored further in the forthcoming second working paper in this series.

Data and AI in Canadian Housing .

Historical Policies and Practices

Crucial to grasping today's social, political and economic Canadian housing landscape is an understanding of its historical development shaping housing accessibility and ownership over time. Stephanie Swensrude (2024) writes that Canadian public housing supply pathways trace back to the Central (now Canadian) Mortgage and Housing Corporation's (CMHC) 1946 National Housing Act, which provided subsidized housing to households in need.[3] Despite its successful output of more than 5,000 social housing units between 1985 and 1989, the CMHC budget was frozen in 1994 and funding for new social housing was stopped (ibid.). This development was representative of a broader trend; as Yushu Zhu et al. (2023) point out, the Canadian federal budget declined from 1.5 percent to 0.7 percent from 1981 to 2016, ultimately leading to Canada becoming one of the least affordable housing markets among the nations in the Organisation for Economic Co-operation and Development. This transition is described by Tobin LeBlanc Haley et al. as one from a welfare housing regime to a neo-liberal regime, featuring strategies such as "tax cuts to landlords, weak protection for tenants, and only minimal investment in social and subsidized housing" (Haley et al. 2024, 80).

3 The National Housing Act supported households that could not afford to pay market prices through facilitating residential construction and loan opportunities; the 1947 annual report on the act indicates that a "higher level of loan is available under the National Housing Act than under other forms of financing and a correspondingly reduced down payment is required from the home owner. The Act makes possible kinds of housing which would not have been built under conventional financing" (CMHC 1947, 5).

Canadian Homelessness Management

In 2017, the Canadian federal government released its National Housing Strategy, which seeks to invest more than CDN$115 billion over the next decade to provide safe, affordable housing and strengthen communities.[4] Its aims include the development of funding programs for housing constructions, renovating current housing stock, and providing loans for research and capacity-building initiatives, with the goals of creating 240,000 new housing units and removing 580,000 families from housing need. The strategy has a special focus on supporting vulnerable Canadians, including women and children fleeing domestic violence, recent immigrants, Indigenous peoples and members of racialized communities, and the 2SLGBTQIA+ community.[5] Also supportive of this national strategy is Reaching Home, the government's homelessness-focused program aimed at reducing chronic homelessness nationally by 50 percent by the fiscal year 2027–2028.[6]

To receive funding for affordable housing, shelter development and operations and related support under the Reaching Home directive, communities are required to have a coordinated access system in place for jurisdictional housing support allocation. The *Reaching Home Coordinated Access Guide* for community providers identifies key features of this approach, including a centralized inventory of housing resources, a common set of triage and assessment tools, consistently applied protocols, clear resources and access points, and, perhaps most importantly, a centralized information system known as the Homeless Individuals and Families Information System (HIFIS) or an equivalent Homeless Management Information System (HMIS) (Employment and Social Development Canada 2019, 6).

HIFIS is a national data collection system designed to support communities in managing data on individuals and families experiencing, or at risk of experiencing, homelessness, including information about housing status, demographics, previously accessed services and additional — and sometimes highly detailed — circumstantial information.[7] HIFIS data is integral to the functioning of coordinated access, which essentially aims to optimize the prioritization of housing resources by matching individuals with appropriate need-based housing support. This involves establishing a priority list determining individual rank order in waiting for housing resources based on information contained in HIFIS/HMIS (Employment and Social Development Canada 2019).

As such, data-driven homelessness management approaches have become commonplace in Canada and worldwide; recent trends have turned toward using predictive AI models to facilitate coordinated access by algorithmically sorting through the information system data for individual priority ranking. In her influential 2018 book, *Automating Inequality: How High-Tech Tools Profile, Police, and Punish the Poor*, political scientist Virginia Eubanks examines one such model in use in Los Angeles that draws from HMIS data to provide users with a vulnerability "score" driving their access (or lack thereof) to housing support. The scoring data in this case was largely informed by a detailed user questionnaire known as the Vulnerability Index — Service Prioritization Decision Assistance Tool (VI-SPDAT),

4 See https://housing-infrastructure.canada.ca/housing-logement/ptch-csd/about-strat-apropos-eng.html.

5 Ibid.

6 Ibid.

7 As part of the coordinated access mandate under the *Reaching Home Coordinated Access Guide*, HIFIS is mandatory in all communities receiving federal funding where an equivalent information and data management system (HMIS) is not already in use (Employment and Social Development Canada 2019).

which is currently being used in more than 1,000 communities across Australia, Canada and the United States (Kithulgoda, Vaithianathan and Parsell 2022, 1952).

Canadian jurisdictions have followed Los Angeles in building AI models using data derived from HIFIS/HMIS as supported by the VI-SPDAT. Researchers in the city of London, Ontario, for instance — which has used the VI-SPDAT for more than five years — built a machine-learning model to allegedly predict chronic homelessness (VanBerlo et al. 2021) from HIFIS data. While London's active use of this tool is unclear, the use of AI to manage HIFIS data for prioritization in coordinated access is becoming a broader Canadian trend, with similar efforts ongoing in the cities of Ottawa (Lynde-Smith 2024) and Calgary (Messier 2022).

The use of assessment tools such as the VI-SPDAT aims to "help guide case management and improve housing stability outcomes" as part of the broader goal of coordinated access to increase supply-and-demand efficiency and success (OrgCode Consulting Inc. 2015). And the use of AI only seeks to support this directive further by automating, and thereby reducing, the labour and resources it takes to manage this supply-and-demand balancing act. As the *Reaching Home Coordinated Access Guide* points out, coordinated access becomes a "powerful planning tool" providing "real-time, quantifiable data" that private and public funders can use to "increase investments in the system" (Employment and Social Development Canada 2019, 4). The use of data and AI-driven approaches is grounded in a belief that better data management leads to better resource management, which in turn creates more efficient service delivery, improved housing outcomes and, ultimately, a reduction in homelessness.

However, a growing body of scholarship has criticized the faults in this approach. Recent work aiming to unveil the ideological underpinnings behind coordinated access crucially suggests that the move toward data and AI-driven practices across social and institutional contexts evidences a broader social, political and economic turn toward datafication, where data is conceptualized as a key value-driver, even being described as the "bloodline of the global economy" (Sadowski 2019). Under this ideology, data is viewed, often without question, as an asset that fuels essential public policies and services.

As scholars have argued, this move toward datafication can be explained by a broader paradigm shift to technological solutionism, which is the idea that complex social and political issues can be solved through technological innovation and administrative efficiency that often ignores the true depth and complexity of social challenges and uneven power structures that inform them (Nichols and Martin 2024). In the case of Canadian homelessness programming, techno-solutionism is evidenced in the underlying assumption that the pipeline from robust and comprehensive data to improved housing access is linear and real. As Naomi Nichols and Mary Anne Martin point out: "Coordinated Access rests on the assumption that the central problem in homelessness-serving sectors is a lack of structured decision-making and coordination of services — rather than a lack of appropriate housing and social and healthcare support for individuals and families in need" (ibid., 224).

In critiquing this assumption, scholars have challenged many elements of datafied coordinated access approaches, including the claim that coordinated access is a successful strategy at all: one review of the implementation of coordinated access in one Ontario city found that none of the "pillars of Coordinated Access (access, assessment, prioritization, matching, and referral) work as intended" (ibid., 222). Another review by Katie Coleman et al. (2025) of the homelessness management efforts in three Canadian cities found that HIFIS was consistently

not being adhered to. Crucially, both of these studies attributed these challenges to resource management complexities related to deeper structural issues, complexities that cannot be resolved by simply collecting and utilizing more data.

Scholars have also identified serious issues related to HIFIS data and its respective role in community housing support allocation. Evidence suggests that women are more likely to experience "hidden homelessness" (Amnesty International 2022, 7), making private arrangements to couch surf or temporarily reside with friends or acquaintances, rather than living on the streets and utilizing public shelter systems (Bretherton 2017; Oudshoorn et al. 2021). But given that HIFIS data collection primarily relies on shelter visits, there is a serious concern that women are being systematically excluded from this data and thus the housing support drawn from it (Oudshoorn et al. 2021).[8]

Researchers have also pointed out serious equity issues with the VI-SPDAT regarding both its content and deployment. Nichols and Martin (2024) have charged the VI-SPDAT with including invasive and traumatic questions, and Eubanks (2018, 70) writes that the system "collects, stores, and shares some astonishingly intimate information" about unhoused people, raising concerns around privacy, surveillance and consent. Moreover, the VI-SPDAT is vulnerable to serious outcome biases, having been found to give disproportionately lower scores to Black and Indigenous people while "prioritiz[ing] white people for permanent supportive housing" (Kithulgoda, Vaithianathan and Parsell 2022, 1953), thanks to a history of exclusion in data collection and relations (D'Ignazio and Klein 2020; Couldry and Mejias 2019). If these biases are fed into a seemingly "objective" algorithm facilitating coordinated access, we simply risk automating the injustices that already exist across homelessness support processes and outcomes (see, for example, Wadge et al. 2024; Duford, Blais and Gervais 2024).

These issues demonstrate the problems inherent in relying on the tenets of techno-solutionism and datafication in social policy making. The conceptualization of data as an unqualified asset for use in the falsely objective algorithmic and technological systems that rely on it is dangerous: even if it did work as intended, this approach simply masks the complex and deeper social, structural and distributive injustices that generate homelessness in the first place. In other words, datafying homelessness does not effectively combat homelessness because it fails to challenge the fundamental structures that create housing insecurity. And if patterns of power and oppression creep their way into algorithmic tools being used to allocate fundamental social goods, which subsequently exclude or limit some individuals' access to these resources, then the use of AI homelessness tools — and their theoretical underpinnings — requires serious attention to ethical and policy questions.

Canadian Real Estate

Data and AI have also expanded into real estate, particularly in the domain of renter-tenant relations. This property tech, or "proptech," is becoming increasingly ubiquitous; Toronto-based software company SingleKey, for instance, uses AI to source and generate detailed tenant screenings, including credit checks, public record searches, employment information and social media activity scans.[9] As Desiree Fields points out, many large-scale housing operators are integrating data-based approaches by

8 Given the guide's self-declared emphasis on vulnerable populations, one implication of this argument is that the *Reaching Home Coordinated Access Guide* fails to live up to its own objective (Employment and Social Development Canada 2019).

9 SingleKey markets this service as enabling "Risk-free renting. Finally" (see www.singlekey.com/en-ca/tenant-report/).

providing online portals for "prospective tenants to search and apply for properties and for current tenants to pay rent and submit maintenance requests" (Fields 2019, 171).[10] Fields writes that this trend indicates the rise of the "automated landlord," whereby "the management of tenants and properties is increasingly not only mediated, but governed, by smartphones, digital platforms, and apps and the data and analytics these devices and infrastructures gather and enable" (ibid., 160). The idea is that the influx of proptech, as enabled by a digital economy, will improve efficiency, accessibility and ease of service for tenants, landlords and other real estate actors.

The use of proptech in real estate thus represents another instance of techno-solutionism. But just as in the case with homelessness management, there are serious pitfalls to these data and AI-driven processes. Scholars have pointed out that the uptick in proptech both represents and enables a move toward the financialization, privatization and commodification of Canadian housing (August and Walks 2018; Fields 2019; Hall 2018). Fields points out the increasingly widespread social positioning of rental housing as a modern financial accumulation strategy (Fields 2019, 160), mediated by digital infrastructures and big data allowing investors to "aggregate ownership of resources, extract income flows, and securely convey these flows to capital markets" (ibid., 162). Through this process, the increasing reliance on automated technology enables the idea of housing to conceptually shift from being a place to live to being a privatized commodity — an investment vehicle — often owned and managed by institutional landlords and other financialized actors. And this neo-liberal ideology facilitates an additional conceptual shift: tenants (and potential tenants) are viewed as opportunities for profit — and for this profit to be maximized, landlords hold an interest in acquiring as much data about them as possible.

This process of datafication ultimately renders individuals as mere data points to be tracked and managed (Nethercote 2023). Recall the ultimately problematic case of SingleKey and the use of data and AI to extensively track online activity to profile and rank potential tenants. The concerns surrounding surveillance, sorting and classification go much further; scholars have also identified the ability for landlords to target and "exclude 'undesirable' market segments from viewing rental listings on Facebook Marketplace" (quoted in Fields 2019, 176; see also Angwin and Parris, Jr. 2016; Childs 2016; Hall 2018). Others have pointed out the ability of financialized landlords to surveil tenants through smart home devices such as "nanny cams" (Hall 2018) and facial recognition technologies under the guise of security (McElroy and Vergerio 2022). In New York, tenants were subjected to extensive biometric surveillance systems to access their homes using technologies "explicitly marketed to landlords to catch tenants for lease violations and then subsequently raise rents" (ibid.). The implementation of these technologies in low-income, BIPOC (Black, Indigenous and People of Colour) housing complexes represents broader historical injustices around surveillance and control over racialized and marginalized communities (ibid.; see also Browne 2015; Gill 2019; Smith 2015) — an especially concerning issue given the inaccuracies of facial recognition technologies with darker-skinned individuals (Buolamwini and Gebru 2018).

Home ownership and renting is a significant economic burden in many people's lives, and the need for housing often subjects vulnerable individuals to unfair and unjust practices and processes. As Iris Marion Young sharply remarks, "the

10 One rental company, Waypoint Homes, even reportedly experimented with a rewards system — "Waypoints" — where "tenants earned points for behaviors aligned with the interests of landlords (such as renewing their lease), which could then be exchanged for rewards that, in many cases, added value to rental properties (e.g. appliances, smart home hardware)" (Fields 2019, 171).

consumer-driven desire of civic privatism tends to produce political quietism" (quoted in Madden and Marcuse 2024). Despite even good-faith promises of efficiency and economic benefit, AI and technologically enabled real estate risks further stripping tenant power by reducing individuals to data points to be sorted and surveilled to their detriment, and often along existing social axes of oppression.

Conclusion

For productive Canadian social housing progress to happen, policy makers, government officials, academics and political actors need to get the framing right. In highlighting the mediating role of datafication and techno-solutionism in Canadian housing policy and practice, this paper aims to bring attention to homelessness and real estate as sites of much broader social power dynamics, as well as the development of new dynamics enabled by data and AI and the ideologies undergirding them. Housing policies and practices act as a crucial looking glass for understanding the impacts of digital technologies and how they can be used to wield power in ways that are not immediately obvious — particularly to those lucky enough (i.e., privileged enough) to have not been directly impacted by them.

Recommendation

To this end, this paper advocates the need for robust, harmonized policy guidelines for housing policy and practice in Canada. Whatever the particular solutions might be — a call for investment in tangible structural support, a ban or partial ban on AI in homelessness management and/or more transparency in its use — they need to originate in a thoughtful and material appreciation for the complexities of the social, political and economic ideologies and underpinnings behind the Canadian housing and homelessness landscape, as described in this paper, in order to adequately deliver meaningful policy change. Part two of this working paper series will supply these guidelines, thereby positioning policy makers to respond to these challenges with informed and inclusive policy, governance and regulation.

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Nathalie DiBerardino is a Digital Policy Hub master's fellow and Western University philosophy M.A. graduate, as well as an incoming Responsible AI Technology Consultant at EY Canada. Her research, supported by a SSHRC Canada Graduate Scholarship, focuses on analyzing the nature and impacts of algorithmic harm, especially on

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