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Digital Policy Hub

Digital Policy Hub – Working Paper

Toward Actionable Policy for the Use of AI in Canada's Housing Crisis

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Key Points

- In response to both a government-led push for artificial intelligence (AI) use in all sectors of the economy, as well as hoped-for efficiency gains in both private and public domains, the use of data and AI in Canadian housing and homelessness management is likely to continue to increase. Yet despite significant global work on AI governance, the impacts of AI in housing require urgent policy attention as a high-risk area.
- Most AI governance guidance in Canada focuses on high-level, principle-based approaches, emphasizing "responsible," "safe" and "ethical" AI. However, these approaches leave governance gaps in many sectors, including housing. As the second part of a two-part working paper series, this paper offers five policy recommendations to close this gap and mitigate AI-related harm in housing:
    - Establish a justification requirement for federal entities (and others that benefit from federal funding for housing) that are looking to use AI in the context of shelter service and housing provision.
    - Mandate human rights impact assessments (HRIAs) as a condition of government funding for organizations that produce or use AI in homelessness management, either as a product or in operations.
    - Do not mandate the use of AI in homelessness management as a condition for government funding.
    - Prohibit the use of facial recognition technologies (FRTs) in residential areas.
    - Require both in-person and online hearings be made available for landlord-tenant dispute hearings.
- The paper then ties these AI- and data-focused recommendations to two broader housing policy suggestions: the promotion of community land and data trusts and community-led response.

Introduction

Canada's housing crisis continues unabated, with rising rental and home ownership costs compounded by a growing population. As indicated in the first working paper of this two-part series, the use of data and AI-driven tools in housing and homelessness contexts is on the rise in tandem with this crisis. However, the use of these tools raises serious concerns related to privacy, transparency, discrimination and exploitation, particularly regarding marginalized social groups.[1]

While much policy and governance work has responded to the use of AI in various public sector contexts globally (for example, criminal justice and education), little policy attention has been paid to its role in housing, especially in Canada. Moreover, most of the existing AI governance literature — including what does focus on housing — has centred on establishing high-level

1 See www.canadahousingcrisis.com.

principles, guidelines and best practices for "responsible," "safe" and "ethical" AI in various social contexts. Less effort has been made toward operationalizing such high-level normative insights into granular policy guidelines.

This working paper seeks to close this gap. The analysis in part one of this series unpacked the background ideologies and social and political structures driving the use of digital technologies and AI in the Canadian housing context. This second paper offers actionable policy recommendations to begin to address these ideologies and their impacts. It works from the conviction that housing policy and governance responses need to operationalize an appreciation of the structurally unjust nature of Canada's housing crisis, as informed by a political economy increasingly marked by renewed efforts to hide root causes behind techno-solutionism and datafication.

Departing from the distinction made in the first working paper of this series, which explored data and AI use in homelessness management as well as the private sector use of technology in the real estate industry, this second paper rolls the first paper's recommendations up to a more general level in ways that will ideally impact both the public and private sectors. Given that many governments are enthusiastic for the use of more data and AI in all sectors, it follows that this use needs to include democratic accountability for the public investments impacted by these choices, as well as the human rights and ethical impacts on citizens, residents and refugees. Focusing on the government to take action on these items enables precedent- and norm-setting, although proactive actors in the private sector can also implement the proposed ideas. The adoption of voluntary standards, for instance, offers an example of this approach in current practice.

The following recommendations are by no means comprehensive; this is a complex and rapidly progressing field where AI use is obfuscated and often unclear. As Lucy Suchman (2023) writes, many long-standing social power relationships and dynamics are being made more opaque through the enthusiastic narratives fuelling the adoption of this technology. Moreover, many of the proposed interventions described here are themselves complex and multifaceted, and a full working paper could easily be dedicated to each of them. However, as described in the first paper, the growing motivation for the use of these technologies in housing, compounded by the potential harms associated with them, merits urgent ethical and policy attention.

Policy Recommendations on the Use of AI in Canada's Housing Crisis

Establish a Justification Requirement for Federal Entities (and Others That Benefit from Federal Funding for Housing)[2] That Are Looking to Use AI in the Context of Shelter Service and Housing Provision

As indicated in the first paper, the use of data and AI-driven practices in housing contexts represents a techno-solutionist social, political and economic landscape, as represented by a triage mentality (in short, the idea that technology can solve non-technological problems) (Eubanks 2018). Yet housing supply and homelessness are complex issues shaped by systemic economic disparities and discriminatory housing practices linked to social oppression. Digital tools can serve as the means, but not the ends, to social progress.

Accordingly, Canadian AI-based housing policy must require developers to clearly justify both the development and the deployment of their AI tools. One way to do so is to modify Canada's Algorithmic Impact Assessment (AIA) to encourage developers to avoid assuming inherent value in technological solutions; for example, by asking them to first consider how can we solve human need, and can AI solve this need in a unique and helpful way, as opposed to how can we use AI to x? as recommended by the Vector Institute's *Principles in Action* AI playbook (n.d.). This framing should be adopted[3] in the AIA (and in any relevant private sector regulatory mechanism) to capture justification as to both why a given AI tool holds the distinct potential to improve a particular issue, and how its concrete mechanism of action can bring about social change.

While such procedural approaches to address the triage mentality may be limited in their transformative capacity, they do create process time that encourages more careful consideration of technological adoption, as well as requiring federal agencies — and those they fund — to document their thinking and operations in a way that creates more public accountability.

2 Canadian federal agencies developing automated-decision systems are currently required to complete AIAs, which is arguably the easiest way to operationalize this policy recommendation. This justification can be expanded to private sector actors by positioning it as a conditional requirement to receive federal funding – the broad normative applicability of AIAs should be recognized by all actors in the space.

3 The AIA currently asks, "What is motivating your team to introduce automation into this decision-making process?" It is important to note that this question does not capture what is being proposed here. Its phrasing still gets the issue backwards: it asks users to defend their presumably already decided use of AI in the given context, rather than defending the value of using AI to begin with.

Mandate HRIAs for Organizations That Produce or Use AI in Homelessness Management, Either as a Product or in Operations, as a Condition for Government Funding

Human rights legislation is increasingly central to AI governance debates, especially amid the rise of risk-based regulatory frameworks such as the European Union's Artificial Intelligence Act, as well as Canadian regulatory efforts such as the (albeit currently inactive) Artificial Intelligence and Data Act (AIDA).[4] However, critics have argued that risk is an insufficient guiding concept for managing AI harms because it problematically allows actors to evaluate operational or business risks against people's fundamental rights, whereas a rights-based governance framework can act as a stoppage to AI use entirely (Hidvegi, Leufer and Massé 2021).

In addition to Canada's general AIA, companies that develop housing and homelessness AI tools that receive federal funding should be required to conduct an HRIA — a type of AI impact assessment that focuses on identifying "broader human rights, equity, economic, or health impacts on users or communities potentially affected by an AI system" — to manage this concern (Law Commission of Ontario [LCO] 2025, 9). This requirement should also be extended to organizations tasked with (and funded for) the construction of affordable housing or the provision of shelter services. The idea is to be expansive in using this gating mechanism to ensure technology is being used appropriately in real-world operations, as well as in product design and development. The intent is not to saddle the wrong organizations with this requirement, as can happen with broad-based approaches; exemptions would be expected to develop over time as specific cases arise.

Applicable organizations can use the HRIA co-developed by the LCO and the Ontario Human Rights Coalition based on Canada's human rights law (LCO and Ontario Human Rights Commission 2024; LCO 2025, 5). While HRIAs are only "one component of a sophisticated, multifaceted AI governance strategy" (LCO 2025, 5), requiring their completion ensures that AI systems threatening to violate human rights in housing contexts are barred before entering any risk evaluation process.

Do Not Mandate the Use of AI in Homelessness Management as a Condition for Government Funding

Canada's National Housing Strategy (2017) requires communities to establish a coordinated access system — a standardized process for prioritizing and matching individuals to housing support based on need. To qualify for funding for affordable housing, shelter development and related services, communities must also use a centralized information system such as HIFIS (Homeless Individuals and Families Information System) or an equivalent HMIS (Homelessness Management Information System) (Employment and Social Development Canada 2019, 6).

Within a techno-solutionist political economy, the use of a datafied management system is often a precursor to the use of AI. While it is debatable whether requiring

4 Note that risk management is also central to Canada's federal Directive on Automated Decision-Making and Ontario's Enhancing Digital Security and Trust Act.

a HIFIS/HMIS is justified as a funding condition,[5] any move to require AI use[6] within the coordinated access system to receive federal funding would be both unjustified and inappropriate. As discussed extensively in the first working paper in this series, the framing of homelessness as an efficiency problem is misguided. At best, AI tools are ineffective in combatting the deeper social issues contributing to homelessness. At worst, they actively generate harm toward those already marginalized, worsening inequality and barriers to justice. Requiring communities to use AI to access funding disregards the nature of homelessness and should not be done.

Prohibit the Use of FRT in Residential Areas

Given the serious issues associated with FRT in housing contexts, an outright ban on the use of these systems in residential spaces is warranted. This stance is not unprecedented: the city of Portland, Oregon, for instance, recently prohibited the use of FRT by private entities in places of public accommodation.[7] Canada following suit at the federal level will put a hard stop to the practice of implementing FRT in residential spaces under the guise of "security" when the more accurate motivation is to "catch" tenants for lease violations — which, as Erin McElroy and Manon Vergerio (2022) point out, is itself merely an automated form of a long history of racist surveillance and property making. Indeed, Canadian scholars are increasingly questioning the legitimacy of FRT, pointing to regulatory failures, privacy risks and problematic adoption practices as reasons to call for such a ban (see, for example, Stevens and Solomun 2021; Owen and Ahmed 2020; Stevens and Brandusescu 2021; Scassa 2025).

Require Both In-Person and Online Hearings Be Made Available for Landlord-Tenant Dispute Hearings

As a response to alleged administrative inefficiencies generated by COVID-19, Ontario's Landlord and Tenant Board adopted a "digital-first" policy for eviction proceedings, where almost all matters are heard via Zoom (Edemariam and Lawler 2023). However, housing and eviction are closely connected, and increased evictions are central to Canada's housing crisis; the rise of financialized landlords and the absence of vacancy control (allowing Ontario landlords to raise rents without limits between tenants) has created "strong incentives" to evict long-term tenants (ibid.).

Ontario's digital-first policy has been criticized extensively for creating an "opaque and inaccessible system that tips the scales of justice toward landlords," disadvantaging seniors, low-income tenants and others due to tech and internet

5 It is undoubtedly true that data about individuals experiencing homelessness is valuable for managing support and resources, as well as for understanding trends, service gaps and systemic causes of housing precarity. However, there are significant issues associated with data collection and storage practices in this context. For example, data gaps and biases have been identified as a serious issue for women and children (Oudshoorn et al. 2021) and those experiencing rural homelessness in Canada (Donaldson, Wang and Escamilla 2025). Indeed, J. Donaldson, D. Wang and C. Escamilla point out that "the complexities and nuances of local systems" may not be fully captured by standardized templates and data reporting tools (ibid., 26). This reality evokes James C. Scott's (1998) insight that localized and contextual approaches to the many ways homelessness is experienced should require equally localized and contextual approaches to technology governance for homelessness data. Standardizing and mandating a particular datafied approach for funding eligibility clearly does not meet this objective.

6 For example, to predict chronic homelessness (see, for instance, VanBerlo et al. 2021; Lynde-Smith 2024) or to manage support allocation for existing unhoused populations.

7 *Prohibit the use of Face Recognition Technologies by Private Entities in Places of Public Accommodation in the City of Portland,* tit 34, *c* 34. 10, online: <www.portland.gov/code/34/10>.

issues, as well as those who face barriers calling from home because of mental health struggles or domestic violence concerns (ibid.; Pace 2024; Hauen 2024). Critics have argued that the system's poorly designed infrastructure creates serious delays, restricts meaningful participation and ultimately accelerates eviction (Edemariam and Lawler 2023). And various Canadian cities, as well as tenants and landlords alike, are agreeing that in-person hearings should be restored (Hauen 2024).

Administrative justice is closely connected to housing, and access to meaningful remedies is a key principle of administrative justice. Canadian provinces and territories should not default to digital approaches to housing disputes that block tenants from meaningful participation — thus undermining housing justice altogether.

General Policy Recommendations Related to the Housing Crisis

Incentivize Community Governance by Supporting Data Trusts for Managing Homelessness Data and Prioritizing Community Land Trusts (CLTs) in Public Land Sales and Tax Funding

In the absence of an expansive social housing program, interim efforts can strengthen community self-governance in housing. Two growing areas of civil society capacity are community data and land trusts, which help residents manage community assets and foster long-term political engagement.

Data Trusts

Data protection is crucial for data and AI-driven housing and homelessness interventions. As Virginia Eubanks notes, popular housing intake questionnaire models used to input client data into a HMIS can include "incredibly intimate questions" about individual health/mental health, crisis service use, risky behaviours and self-harm, as well as protected personal information such as social security number, name, birthdate, demographic information, immigration status, domestic violence history, and more (2018, 77). And critics of real estate property technology have highlighted data issues related to surveillance, sorting and exclusion in targeted ads, rental listings, smart home devices and FRT in residential complexes (Angwin and Parris Jr. 2016; Childs 2016; Hall 2018; Fields 2022).

For these reasons, data governance, especially data privacy and security, must be addressed in policy responses to datafied homelessness management. To do so, communities can establish some version of a data trust, described by Bianca Wylie and Sean Martin McDonald (2018) as "contracts that give a trustee, or group of trustees, authority to make decisions about how [data] can be used on behalf of a group of people."

While, like HRIAs, data trusts do not "inherently create good governance" (Wylie and McDonald 2018), they have the benefit of supporting recent calls for participatory data stewardship, particularly for vulnerable populations whose data may be used in high-stakes decision making. Indeed, recent literature has emphasized the importance of community-based participatory governance by those directly impacted by AI harms (see, for example, Metcalf et al. 2021). And scholars have increasingly recommended community-governed data trusts (see, for instance, Stinson 2018), given their potential as "privacy safeguards" (Bernier 2021). This paper cannot describe how a data trust system should work in detail, but a few key features are as follows:

- Ownership by a non-profit cooperative that includes the representation of unhoused individuals, homelessness advocacy groups (for instance, the Canadian Alliance to End Homelessness), and legal and privacy experts. Data trusts should not be privately owned, as emphasized by Anna Artyushina (2020) in the context of Toronto's failed "smart city" Sidewalk Toronto project.
- Optionality for clients to correct, annotate or contest data gathered about them in HMIS, addressing issues highlighted by Erina Seh-Young Moon et al. (2025) in studying Toronto's coordinated access data practices, where mistrust and inconsistent interviews call for "fluid data practices" that view client data as an "evolving and continuous construct" through care and rapport (ibid., 9).
- Integration of Indigenous data sovereignty principles where relevant, including the CARE (collective benefit, authority to control, responsibility, ethics) and OCAP (ownership, control, access, possession) principles.[8]

CLTs

CLTs are non-profit organizations that acquire and steward land for community benefit by separating land ownership from property ownership. Encouraging CLTs can stabilize housing, prevent displacement and enable long-term affordability by keeping land in collective stewardship. However, it is crucial to note that a key precursor to moving into discussions about CLTs, or the expansion of any social housing program, is the need for a "reset" regarding the current status of what is understood as "public land" in the context of relations with Indigenous peoples in Canada. Recasting conversations about how to address the housing crisis should be an opportunity to engage in more public education about the history of land in Canada and how future decisions about land use can be made differently than in the past.

Establish Community Response Groups for Homelessness Management with Diverse Stakeholder Engagement and Robust Organizational Methods

Homelessness is a systemic issue that demands strong inter-governmental and community coordination for effective management. To that end, an important case study is the City of London, Ontario's Health and Homelessness Whole of Community System Response program, comprising 200 individuals from nearly 60 local

8 See www.lib.sfu.ca/help/publish/research-data-management/indigenous-data-sovereignty.

organizations focused on cross-sector collaboration spanning social services, health care, education, emergency services, business, housing and multiple levels of government.

The group has set strategic priorities, such as establishing community "hubs" to help the most marginalized, unhoused Londoners find stability and sustainable housing. The program is also organized by tables, or advisory groups, focusing on specific issues, such as the system foundation table's commitment to evaluating new activities and ensuring program sustainability (Mackay 2024). Community response groups hold valuable potential for managing local housing and homelessness challenges, given both their geographic and epistemic closeness to particular issues faced by their jurisdictions.

Conclusion

While this paper's goal is to provide actionable insights for Canadian housing and homelessness policy, it would be remiss to end without acknowledging some of the broader, ongoing social issues contributing to the challenges discussed in this working paper series, which must be continuously recognized as overarching enablers of Canada's housing crisis:

- **Siloed policy analyses resulting from unclear roles and responsibilities for housing at different levels of government and between public sector departments and ministries**. For example, the connection between housing and education policy is deep but is not being treated as such due to bureaucratic obscurities.
- **The overall need for more investment in housing. This working paper supports the view that homelessness is primarily a housing issue**. While this paper cannot enter the debate surrounding the actual mechanisms needed for housing affordability here, this need must be continuously acknowledged and prioritized.
- **The public perceptions and narratives of homelessness as an individual moral failing, as perpetuated and proliferated by algorithmically driven social media discourse (see Sangiuliano, Moraes and Howells 2025)**. It is epistemically, normatively and practically problematic for policy makers to operate under the assumption that individual responsibility alone explains homelessness.
- **The lack of overarching AI regulation in Canada**. While Canada is expanding its regulatory attention to AI, its foremost federal proposal, AIDA, is essentially (at the time of writing) in regulatory limbo with an unclear path forward. This regulatory absence leaves significant gaps in protecting rights and preventing misuse and harm across critical sectors, including housing.

Overall, this paper aims to address the gaps in Canadian data and AI housing and homelessness policy appropriately, where "appropriately" means respecting the nature of this housing crisis as one rooted in structural injustices and techno-solutionist agendas. It ultimately hopes to promote a more equitable and effective approach to addressing housing and homelessness in Canada.

Recommendations

A summary of the recommendations put forth in this working paper are as follows:

- Establish a justification requirement for federal entities (and others that benefit from federal funding for housing) that are looking to use AI in the context of shelter service and housing provision.
- Mandate HRIAs for organizations that produce or use AI in homelessness management as a condition for government funding.
- Do not mandate the use of AI in homelessness management as a condition for government funding.
- Prohibit the use of FRT in residential areas.
- Require both in-person and online hearings be made available for landlord-tenant dispute hearings.
- Incentivize community governance by supporting data trusts for managing homelessness data and prioritizing community land trusts in public land sales and tax funding.
- Establish community response groups for homelessness management with diverse stakeholder engagement and robust organizational methods.

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