

The Language of Neglect:  
A Critical Discourse Analysis of Single Room Occupancy Housing Inspection Reports

by  
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We acknowledge and respect the Lək'wəḡən (Songhees and Esquimalt) Peoples on whose territory the university stands, and the Lək'wəḡən and WSÁNEĆ Peoples whose historical relationships with the land continue to this day.

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## Abstract

In Vancouver, Single Room Occupancy (SRO) hotels serve as last-resort housing for people facing structural inequities. SRO building inspection reports frame these spaces through a discourse that individualizes responsibility for poor living conditions while obscuring systemic neglect. Using Norman Fairclough's Critical Discourse Analysis (CDA), my thesis examines how Vancouver's annual SRO inspection reports construct tenants, property conditions, and regulatory compliance. Findings reveal that reports discursively position tenants as risky, unpredictable, and the primary source of building deterioration, reinforcing narratives of the hard-to-house tenant, while failing to properly address the broader structural deficits and overall disrepair of the buildings. Safety discourse prioritizes fire code compliance over tenant security, justifying measures like the removal of secondary locks, overlooking the realities of assault, theft, and unauthorized tenant room entry. Similarly, pest infestations and structural decay are framed as tenant-induced problems (hoarding, clutter) rather than the consequences of chronic underfunding and deteriorating infrastructure. The analysis also highlights how inspection reports create manufactured compliance, where issues are deemed "resolved" based on procedural checkboxes rather than actual improvements for tenants. These opaque discursive ideologies normalize inadequate housing conditions, reinforcing the broader regulation of poverty. The findings are situated within the right to housing framework, challenging the dominant bureaucratic narratives that treat tenants as problems to be managed rather than individuals deserving of safe and dignified housing. A critical re-examination of how bureaucratic discourse shapes housing policy is necessary, as it often reinforces systemic inequities rather than addressing them. Drawing on Fairclough's approach to CDA, the findings illustrate that discourse is not neutral but an instrument of power. Examining discourse through a critical lens exposes its role in maintaining inequality and opens possibilities for challenging dominant narratives and advocating for housing as a fundamental human right.

*Keywords:* housing adequacy, human rights, Downtown Eastside, housing strategy, single room occupancy (SRO), habitability

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## Chapter One: Introduction

Precarious housing and homelessness represent significant social challenges intricately tied to broader issues of inequality and systemic neglect (Heffernan et al., 2015). These conditions are not merely the result of individual circumstances but are manufactured and sustained through deliberate policy and legislative choices. The systemic divestment from adequate housing standards by all levels of government has predictably exacerbated housing insecurity across Canada (Heffernan et al., 2015; C. Whitzman & Flynn, 2023).

Nowhere is this more evident than in Vancouver's Downtown Eastside (DTES), where housing precarity has been strategically produced by way of the financialization and privatization of the housing supply in Vancouver, maintaining an institutional dominance over a community that faces an inordinate amount of structural barriers (August, 2022; Boyd et al., 2016; Boyd & Kerr, 2016; Fleming et al., 2019; Heffernan et al., 2015; Higashihara, 2021; McNeil et al., 2021). The DTES is cited as Canada's poorest postal code, epitomizing the outcome of such significant systemic failures (Fleming et al., 2019). The DTES starkly illustrates the consequences of unregulated housing markets over the past three decades. The community in the DTES is characterized by high levels of poverty, substance use, and chronic housing insecurity exacerbated by a lack of affordable, safe, and supportive housing options (Boyd et al., 2016; Singh Kelsall et al., 2023).

Neoliberal policies over the past three decades have transformed housing from a public good into a commodity, driving real estate prices to unprecedented levels creating a severe shortage of affordable housing (August, 2022; Heffernan et al., 2015; Higashihara, 2021). This trend is not unique to Vancouver but reflects broader global patterns where housing markets have been deregulated, and public housing has been defunded (August, 2022; Higashihara 2021;

Hulchanski & Shapcott, 2004). In Vancouver, the housing crisis is further compounded by the City's role as a global real estate market. Investment-driven demand has inflated property values, pushing low-income residents out of the housing market and into precarious living conditions. The DTES has thus become a battleground for housing justice, where the impacts of these policies are most acutely felt. Understanding how discourse perpetuates structural power and oppression over populations facing structural inequity is crucial for addressing housing precarity. These ideologies manifest in policies that prioritize economic growth over social welfare, leading to the displacement of communities like the DTES. The DTES is a microcosm of this dynamic, where systemic divestment from adequate housing standards has predictably exacerbated housing insecurity (Heffernan et al., 2015; C. Whitzman & Flynn, 2023). By examining the DTES, we can uncover broader mechanisms that perpetuate housing inequality and explore potential pathways for policy reform.

Within Canada, the right to housing is now legally recognized as a fundamental human right, formally codified in 2019 under the National Housing Strategy Act (NHSA). This landmark legislation acknowledges housing as essential to the dignity and well-being of individuals, committing the federal government to the progressive realization of adequate housing as defined by international human rights law, including the United Nations International Covenant of Economic, Social, and Cultural Rights (UNICESCR) (Canadian Mortgage and Housing Corporation (CMHC), 2022; National Housing Strategy Act (NHSA), 2019; United Nations, 1966). The NHSA established the Federal Housing Advocate and the National Housing Council to monitor and address systemic housing issues, ensuring all Canadians have access to affordable, safe, and adequate housing. The right to adequate housing in Canada means attention to seven dimension, security of tenure, affordability, habitability, accessibility to services,

location close to employment and other basic services, accessibility for people of all abilities, and is culturally appropriate (Federal Housing Advocate (FHA), 2023). I will be focusing particularly on habitability, which is often not addressed for this research. This legal framework emphasizes the government's accountability in meeting these goals and marking a significant shift in housing policy. Furthermore, the right to housing in Canada implicitly supports sections seven and fifteen of the Canadian Charter of Rights and Freedoms (CCRF) (Government of Canada, 2024). Section seven guarantees the person's right to life, liberty, and security, which courts have interpreted to include a degree of socio-economic security encompassing housing (Government of Canada, 2024; United Nations Human Rights, 2024). Section fifteen guarantees equality rights and protects against discrimination, ensuring equal access to housing for groups and communities that face structural inequities (Government of Canada, 2024). These provisions reinforce housing as a fundamental human right and a social inclusion and well-being determinant. These provisions underpin the legal framework supporting the right to housing in Canada, emphasizing its importance in the context of public health and social justice.

### **The Intersection of Housing and Health in the DTES**

Housing is a critical social determinant of health (SDH), with profound implications for individual, community, and global health outcomes (Mwoka et al., 2021; Starzomski et al., 2023). Inadequate housing conditions are associated with a range of adverse health outcomes, including increased risks of chronic diseases, mental health issues, and infectious diseases (Boyd & Kerr, 2016; Fleming et al., 2019; McNeil et al., 2021; Shannon et al., 2006). In the DTES, these health implications are exacerbated by the high prevalence of substance use, mental health disorders, and barriers to accessing healthcare services. Evidence from the Argintaru et al. (2013) cross-sectional study of health needs amongst precariously housed tenants in three large urban

cities in Canada has shown that stable, safe, affordable, and adequate housing is fundamental to improving health outcomes. For instance, individuals experiencing homelessness are more likely to suffer from severe health issues and have higher rates of hospitalizations and emergency room visits (Argintaru et al., 2013). By securing adequate housing, it is possible to significantly improve health outcomes and reduce the strain on the public health systems.

In the DTES, the intersection of housing and health is starkly evident. High rates of homelessness, substandard living conditions, and a lack of supportive housing options contribute to a public health crisis (Heffernan et al., 2015; Hwang et al., 2011; Knight et al., 2014; Shannon et al., 2006). Residents face elevated risks of overdose death, blood-borne infections, and mental health crises (Hwang et al., 2011; Knight et al., 2014; Shannon et al., 2006). The aforementioned crises are intersecting and impacting health equity (Boyd et al., 2016; Hwang et al., 2011; Mwoka et al., 2021). These issues are compounded by the socio-economic marginalization of the community, which limits access to health services and social supports. Literature on the intersectionality of the DTES community highlights the need for integrated approaches that address housing and health simultaneously (Boyd & Kerr, 2016; Fleming et al., 2023; McNeil et al., 2021). For example, harm reduction programs, which provide safe injection sites and access to medical care, have been shown to reduce health risks and improve outcomes for individuals with substance use disorders (Boyd et al., 2016). Similarly, supportive housing models that combine affordable housing with on-site health and social services have proven effective in stabilizing the lives of the people tenancing these buildings in the DTES (Fleming et al., 2019).

Canada is in the midst of a national housing crisis (Whitzman et al., 2022). To meet internationally recognized adequate housing standards, all levels of Canadian government must act with urgency and utilize all available resources to progressively realize adequate housing for

all Canadians (Whitzman et al., 2022). While housing responsibility is shared across all levels of government, municipalities face a particularly significant and costly challenge, as they are the closest governing bodies to those experiencing housing needs (Whitzman et al., 2022).

Municipalities play a crucial role in ensuring housing adequacy through needs assessments, land acquisition and assembly, zoning and approvals, and the prevention of affordable housing loss (Whitzman et al., 2022). Although achieving adequate housing requires strong and immediate action from all levels of government, municipalities have a duty to their communities to act now. Monitoring health and safety is essential to realizing the right to adequate housing, highlighting the need to critically examine how municipalities use bureaucratic tools to maintain substandard housing for communities who face marginalization, such as the community members of the DTES. Ultimately, the progressive realization of housing is a step toward housing justice for all Canadians.

Despite extensive research on various aspects of health, wellness, and surveillance in Vancouver's DTES, there remains a significant gap in understanding how language is used to maintain power and perpetuate systemic norms of power (Argintaru et al., 2013; Boyd et al., 2016; Fairclough, 1985; Fleming et al., 2019; Hwang et al., 2011; McNeil et al., 2021; Pablo, 2015; United Nations Human Rights, 2024). Numerous studies have documented the health challenges faced by people who are sleeping rough, precariously, or supportively housed as having increased difficulty in accessing healthcare services (Argintaru et al., 2013; Fleming et al., 2019; Lazarus et al., 2011; McNeil et al., 2021; Mwoka et al., 2021; Shannon et al., 2006). Additionally, there is substantial evidence on how policy decisions impact housing as a human right (Fleming et al., 2023; Heffernan et al., 2015; Schwan & Perucca, 2022; C. Whitzman & Flynn, 2023). However, there is a notable absence of research examining the role of language in

reinforcing power within and between institutions, such as municipalities and property management companies (PMC), the closest institutions to the tenants of Single Room Occupant (SRO) hotels, and its effects on structurally vulnerable residents. More so, there is a notable gap in analysis of institutional mechanisms that maintain and survey housing standards. Adequate housing, as defined by the United Nations, extends beyond shelter to include security of tenure, affordability, habitability, accessibility, and protection from forced eviction (United Nations Committee on Economic, Social and Cultural Rights (UNCESCR), 1991). Despite this, institutional discourse often reduces housing concerns to regulatory compliance, overlooking tenants' lived experiences and systemic barriers to housing security (Schwan & Perucca, 2022; UNCESCR, 1991). This study aims to fill these gaps by analyzing the use of language, photographs, and social context present in the City of Vancouver's SRA health and safety inspection reports for SRO hotels, thus shedding light on the subtle ways language can perpetuate inequities and shape the lived experiences of the population in the DTES.

### **Research Aims and Objectives**

This research aims to critically analyze how adequate housing, as defined by the right to housing, is discursively positioned within building health and safety inspection reports in the context of municipal building health and safety inspection reports and assess how institutions maintain oppressive power over the progressive realization of the right to housing in Vancouver's DTES. Within the overarching aim, my primary objectives are to:

- 1) Examine the historical and political contexts drawing on health and safety reports that have contributed to the housing precarity and status quo of SRO hotel housing in the DTES;

- 2) Assessing and the implications of housing conditions for health and well-being of DTES residents, to evaluate current housing policies and programs in Vancouver and their effectiveness in addressing housing inadequacy; and
- 3) Explore potential policy reforms and interventions that could enhance housing adequacy and improve health outcomes in the DTES.

To address these aims and objectives, my research will analyze key documents obtained through a Freedom of Information (FOI) request filed with the City of Vancouver (CoV) in June of 2021. The request included the Single Room Accommodation (SRA) health and safety annual inspection reports for three deteriorating SRO hotels within the DTES community, including, citations and follow-up email communication between CoV inspectors, SRO housing managers operating under PMC, and representatives from parent housing provision institutions such as BC Housing. While the CoV refers to SRO buildings as SRA hotels in its official documentation, this paper will use the more commonly recognized term SRO hotels for consistency. This FOI resulted in a compendium of documents representing a comprehensive and a transparent collection of inspection reports. These documents provide a rich source of textual data and pictures corresponding to each violation in the report, offering a window into the regulatory practices and decision-making processes that impact the living conditions of SRO residents. Specifically, the inspection documents offer clear insight, including photographs, into the habitability of SRO hotels in the DTES. By critiquing these reports, this research aims to contribute to the ongoing discourse on housing rights, public health, and social justice, providing valuable insights for policymakers, health professionals, and advocates working to improve conditions in the DTES.

To achieve the aim of this study, critical discourse analysis (CDA) is used – a methodological approach concerned with the ideological assumption that language, texts, and photographs establish and maintain the social and institutional power structures and how particular language is used to govern the kind of knowledge that is therefore reflected in society (Cheek, 2004; Lupton, 1992). In particular, Fairclough’s approach to CDA relies heavily on the critical social science framework (Fairclough, 2013b). By using Fairclough’s CDA, researchers can assess societal context or background and evaluate how institutions use “common sense” language and discourse to maintain power over and against specific groups to maintain the “good society” per the institutions benefit (Fairclough, 2013b). My thesis will use CDA to analyze the City of Vancouver’s *Annual SRO Health and Safety Inspection Report* for three deteriorating SRO hotels in the DTES.

### **Thesis Structure**

My thesis is structured as follows: Chapter Two provides the broader context to the issue of adequate housing, as defined by the right to housing both internationally and under the National Housing Strategy Act. Specifically, adequacy standards within the DTES SRO hotel network, in addition to a literature review regarding the impacts of inadequate housing on the health and well-being of SRO hotel tenants. Within this research, context is crucial, as it shapes the interpretation and understanding of the impacts of specific language used within the inspection reports and the potential tenant impact in not achieving the human Right to housing. The conditions in Vancouver’s DTES are influenced by myriad social, economic, and political factors that affect residents’ lives and the regulatory environment of housing. Situating this research within the historical and socio-political context of the DTES allows for a deeper analysis of how power and ideologies are embedded within the discourse of the inspection

reports, strategically or unconsciously. Chapter Three outlines the methods, in addition to methodology guiding this study, detailing how this research applies Fairclough's critical discourse analysis (CDA) to the inspection reports. Chapter Four presents the research findings, highlighting central ideological discursive formations (IDF) within the texts. Chapter Five discusses the findings within the extant literature on the human right to housing, the structure and maintenance of SRO hotel housing in the DTES, and the substantive intersection of housing and health status. This Chapter also considers limitations of the study, and offers recommendations for improving housing adequacy and advancing the right to housing in Canada, particularly in Vancouver's DTES.

### **Researcher Positionality**

I am a practicing Registered Nurse (RN) in Vancouver's DTES. In 2018, two years after the toxic unregulated drug supply was marked a public health emergency, I began my journey as an outreach RN, after four years in other acute care nursing settings. For five years, I was an HIV outreach RN – complex case manager at a local Vancouver health authority. In this role, I observed systemic inequities I would not have experienced otherwise. I watched a line of cockroaches marching up the wall of my client's SRO hotel room while I was drawing blood during an outreach visit. On numerous occasions, in multiple different SRO hotels, the only elevator in the building would be under maintenance for months on end. I knew of various tenants who used mobility aids in these buildings. I watched in sadness as a client of mine maneuvered several flights of stairs with their mobility aid, or simply, my clients would not leave their floor or room for days, given that it was impossible to leave because of the physical difficulty in taking the stairs. Of note, these buildings are the only affordable options outside shelters and sleeping rough in the DTES, if not for a limited number of newer built supportive

housing buildings, which also struggle with persistent pest infestations like those in the unkempt SROs.

It is also my experience as an RN outreaching to these SRO hotels that tenants are under a level of control that I do not experience in my housing in a different neighbourhood in Vancouver. On outreach, I must always check in with 'support' staff with my ID badge to be allowed into the buildings. For six years, I have walked the stairs cases of all of the SRO hotels included in my research data set. Many SRO hotels in Vancouver's DTES are in historical buildings where the craftsmanship of the woodwork of the early 1900s was something to be admired. I would always try to take nursing students on outreach to the more historic buildings to show students the historical beauty of early 1900-Vancouver architecture (Cheung, 2019). However, the thing about many SRO hotels is they appear to have not been updated since the early 1900s. While the woodworking is still beautiful, cockroaches often line the door frames, pipes frequently break, and some of my clients required relocation to other SROs when their rooms flooded. Rotten floors and infestations are common complaints of my clients. From my position, it has appeared that the housing situation has only worsened since the beginning of the pandemic to our present day in Vancouver's DTES. I believe it is imperative to start holding institutions and governments accountable for the right to adequate housing and to critique documentation that unconsciously maintain dominant institutional power while upholding sub-adequate housing for tenants facing structural inequities.

I have had trouble understanding the adequacy and maintenance of SRO hotels. Only a few years ago, I was outreaching a client to provide wound care to a lower leg oozing ulcerative wound. It was July and hot that year. I was in my client's room for twenty minutes. After completing the dressing change, I had sweated through my scrubs, and my lungs were heavy

with stale air. I had to walk up seven flights of stairs and back down once I had finished my nursing task because the one elevator in the building had been broken for months at that time. Once I was able to catch my breath outside in the heat of July, I found myself frustrated for the tenants of that SRO hotel and many others I knew of who didn't have appropriate air flow or means of getting through the building if they were not able-bodied. This frustration was an impactful moment in my career as it led to my application to this Master's degree. Around a year later, I was presented with the opportunity from a colleague to review a data set acquired through a Freedom of Information (FOI) released from the City of Vancouver (CoV) regarding SRO hotel building health and safety inspection. I was provided this data set with the permission from the FOI submitting journalist's and with approval from my Master of Nursing supervisor I decided on a critical discourse analysis (CDA) of municipal bureaucratic inspections reports. I was hopeful that by doing this kind of research I might help identify how discursive ideology in rather mundane reports might disrupt the status quo of SROs not meeting the right to adequate housing. The selected texts, for me, are a form of resistance to current dominant institutional ideologies regarding adequate housing for the many clients I have come to know deeply and many others who deserve safer, dignified, and adequate housing that SRO hotels will never be able to provide.

I have seen objectively despicable environments where the people who face structural inequities from the state are essentially forced to live. After years of learning my clients' stories, it was and remains clear that they have all experienced social inequities related to the access to adequate housing as defined by the right to housing. My caseload of clients was diverse in relation to their housing precarity. However, they had all experienced sleeping rough or being precariously housed in their lives. Many of my unhoused clients could only be found if they

made a visit to a local emergency department or were cycling through the carceral system. Both outdoors and in housing my clients faced deplorable living conditions that are inadequate and unhealthy failing to meet public health standards related to access to water, sanitation, hygiene, and without their environment being free of mold or pests. With that said, Chapter Two is a deep dive into the social, legal, and political climate of housing adequacy in Vancouver's DTES.

## **Chapter Two: Context and Literature Review**

Housing and the subsequent evaluation of housing adequacy must be reviewed in a broader, as well as direct, meaningful way to understand the complex intersectional nature of housing injustice. In Chapter Two, I will first discuss housing obligations and the right to housing both internationally and specific to Canadian law, presented in a chronological order. A review of current adequate housing legislation under federal Canadian law is provided. A literature review is conducted and synthesized in order to understand the context and connectedness of housing as a social determinant of health and the impacts of inadequate housing on the health of tenants. Then, an assessment of what adequate and inadequate housing means in the context of Canadian human rights is provided. Next, the history of housing provision in Canada is reviewed and housing providers with ties to a low socioeconomic neighbourhood in Vancouver are introduced. Finally, an in depth examination of the context and social construction of Vancouver's Downtown Eastside (DTES) is presented with particular attention to single room occupancy (SRO) hotels.

### **Adequate Housing Obligations in International and Canadian Law**

The United Nations International Covenant on Economics, Social, and Cultural Rights (UNICESCR) and the National Housing Strategy Act (NHSA) within Canada have defined adequate housing by clearly providing seven criteria to satisfy housing adequacy: legal security of tenure, availability of services, affordability, habitability, accessibility, location, and cultural adequacy (Federal Housing Advocate (FHA), 2023; United Nations, 1966; NHSA, 2019). I will discuss in detail the roles the UNICESCR and the NHSA have in setting housing adequacy standards. The criterion of habitability is central to the definition of adequate housing and is the focus of this research. Realizing adequate housing habitability includes providing sufficient

space, guaranteeing safety, protection from elements and other health threats, and ensuring no structural hazards or major repairs are required for habitability adequacy to be met (FHA, 2023). In this research, I conduct a hyper local analysis related to habitability and the right to housing locally, by critiquing three of the City of Vancouver's (CoV) SRO hotels' building health and safety inspection reports. Understanding housing adequacy at a broader, even global level, through policy frameworks like the United Nations' definitions and Canada's NHSA provides essential context for analyzing the local, lived, realities of tenants in Vancouver's DTES. These global and national standards set expectations for what constitutes adequate housing, making it possible to critically examine how SRO housing conditions fails to meet those benchmarks at the micro level (NHSA, 2019; UNICESCR, 1991).

### **The United Nations International Covenant on Economic, Social, and Cultural Rights**

Canada is a signatory on the United Nations (1991) International Covenant on Economic, Social and Cultural Rights (UNICESCR) which recognizes the inherent dignity and equal rights of all of its members; Canada has come up short in the realization of the intrinsic dignity in housing to a specific low socioeconomic population that is already burdened with structural injustices (Farha, 2017; UNICESCR, 1991). The UNICESCR defines adequate housing through seven core criteria: legal security of tenure, availability of services, affordability, habitability, accessibility, location, and cultural adequacy (UNICESCR, 1991). Among these, habitability is a central concern and serves as the primary focus of this research. According to the UNICESCR (1991) housing must provide sufficient space, safety, protection from environmental hazards, and be free from structural risks or major disrepair to be considered habitable (FHA, 2023; NHSA, 2019; UNICESCR, 1991). However, reports and research on housing conditions in Vancouver's SRO hotels describe environments that do not align with these standards, raising concerns about

not meeting standards of internationally recognized housing rights and the persistent exposure of tenants to unsafe living conditions (Farha, 2017; Singh Kelsall et al., 2023; St. Denis, 2021, St. Denis, 2022a, 2022c).

Municipal housing policy plays a key role in shaping habitability conditions (Whitzman et al., 2018). The City of Vancouver (CoV) *SRA Annual Inspection Reports – Standards of Maintenance By-law 5462*, document health and safety concerns in SRO hotels, yet housing habitability issues remain widespread despite ongoing annual inspections. The UNICESCR frames adequate housing as a fundamental human right tied to dignity and self-determination stating (United Nations, 1966). Per Article 1 of the Covenant, guarantees all people the right to freely pursue their economic, social, and cultural development, a right that is directly impacted by housing conditions (Farha, 2017; United Nations, 1966). Typically, people who tenant SRO hotels are often stuck in an endless cycle of poverty, which makes actualizing their pursuits of economic, social, and cultural development nearly impossible or very challenging (Boyd et al., 2016; Fleming et al., 2019; Singh Kelsall et al., 2023). Further restrictions on tenant autonomy raise concerns of Article 5 of the Covenant being upheld, which states “no state, group, or person may act in a way aimed at the destruction of another’s rights to freedom” (United Nations, 1966, p. 2). Article 5 of the Covenant may not be upheld in DTES SRO hotels and other supportive housing buildings across the province of British Columbia via tenant restrictions that are outliers from the British Columbia Residential Tenancy Act (RTA), as in restricting guests and requiring government ID from tenants to enter the buildings, which is not seen in other commercial housing rental properties in Vancouver (Anthony, 2018; Boyd et al., 2016; Singh Kelsall et al., 2023; St. Denis, 2022a, 2022c). The issue of restrictive guest policies imposed on tenants in SRO and other supportive housing buildings has previously been challenged in British Columbia’s

Supreme Court (Anthony, 2018). In a landmark 2018 ruling, the court struck down blanket guest restrictions, dismissing an appeal brought forward by the Not-For-Profit Property Management Company . The judge ruled that tenants living in below-market housing should not be subject to fewer legal rights than those paying market rates (Anthony, 2018). The decision established a critical legal precedent, reinforcing the principle that housing status should not determine the extent of tenant rights and freedoms. Despite this ruling, guest restrictions continue to be enforced in SRO and supportive housing settings, which raises concerns about ongoing potential of tenants rights to self-determination and equal legal protections not being upheld (Boyd et al., 2016; Fleming et al., 2019; Singh Kelsall et al., 2023).

The habitability concerns in SRO hotels also raise questions around Article 11 of the Covenant, which guarantees an adequate standard of living and requires continuous improvements to housing conditions (United Nations, 1966). Media coverage reveals tenant perspectives that indicate no improvement in living conditions for those tenancing SRO Hotels in Vancouver over decades (St. Denis, 2020; St. Denis, 2021, St Denis, 2022a, 2022c). One of the most extreme examples of inadequate housing related to habitability has been the high rate of structural fires in SRO hotels and large SRO hotels being condemned after many years of By-law violations in the DTES, which have displaced hundreds of tenants over many years (Griffiths, 2023; St. Denis, 2020; St. Denis, 2022c; St. Denis, 2023). Many displaced tenants have been left with no stable rehousing options, forcing them into shelters, encampments, or outright homelessness raising questions as to whether municipal, provincial, federal policies are upholding their obligations to adequate housing under Article 11.

In addition to structural failures, housing conditions in Vancouver's SRO hotels pose serious health risks, conflicting with Article 12 of the Covenant, which guarantees the right to

health and the prevention of disease (United Nations, 1966). Research on housing-related health disparities has identified poor air quality, inadequate sanitation, and exposure to disease, among others as risks to tenants health and wellbeing in SRO hotels (Evans & Strathdee, 2006; Hwang et al., 2011; Lazarus et al., 2011; Liao et al., 2024). Examples of tenant complaints in local media and subjective complaints from my old case managed clients were chronic rodent, cockroach, and fly infestations, ceiling and floor collapses, flooding, and fear of staff or other tenants and guests in the buildings (Shannon et al., 2006; St. Denis, 2020; St. Denis, 2021, 2022a). My clients often feared that they could not fall asleep because the rats would bite them and make them sick. Fearing rats will bite you in the night would likely be an infringement of the right to prevention and control of diseases, as stated in the Covenant articles. Further, a lack of sleep has an impact on physical and mental health (Byers et al., 2019; St. Denis, 2021). My clients additionally endorsed that they feared the drinking water in their SRO hotel buildings, as they felt the culprit of their gastrointestinal illness was the building's water or old decaying piping. My clients would also express fear that their co-morbidities, especially related to respiratory issues, were related to black or pink mould in the walls, piping, and other structural areas of the building, like shared kitchen and washing spaces. These reports align with research on housing-related health risks, which has demonstrated a clear connection between substandard housing conditions and increased vulnerability to chronic and infectious diseases (Fleming et al., 2019; McNeil et al., 2021). The absence of systemic interventions to address these habitability and health risks further highlights potential failures to uphold Article 12 of the Covenant.

Evidence from housing policy research, tenant accounts, and municipal reports suggests that Canada, specifically in the context of Vancouver's DTES, is failing to meet its obligations under the UNICESCR (Farha, 2017). Articles 11 and 12 explicitly establish the right to adequate,

safe, and dignified housing, yet the longstanding and well-documented habitability issues in SRO hotels indicate that these rights are being neglected (Evans & Strathdee, 2006; Griffiths, 2023; Liao et al., 2024; St Denis, 2020). Reports suggest that housing governance in Vancouver has emphasized regulatory compliance over meaningful improvements in tenant living conditions, allowing for the continuation of inadequate housing conditions to persist without any truly adequate enforcement mechanisms. Despite Canada's commitment to the progressive realization of housing rights, violations of the UNICESCR remain largely unchecked, raising critical concerns about the gap between international human rights obligations and domestic housing realities (Farha, 2017; UNICESCR, 1991).

### **National Housing Strategy Act**

In 2019, Canada implemented the National Housing Strategy Act (NHSA), a rights-based legislative approach to housing as a human right (NHSA, 2019). The law was created to align Canada with international human rights and Canadian charter standards of adequate housing. The NHSA provides legal prudence to Canadians for the right to live somewhere in safety, security, and dignity (Government of Canada, 2024; NHSA, 2019). The Act explicitly identifies populations in the greatest need of adequate housing as people with lived experiences of housing precarity or homelessness, Indigenous people, 2SLGBTQIA+ people, people fleeing domestic violence, seniors, people living with disabilities, people with mental health concerns, and those living with addiction (NHSA, 2019). Under this Act, all levels of government – federal, provincial, and municipal – are required to systematically participate in the progressive actualization of adequate housing as defined by the human right to housing for all (Andersén et al., 2023; FHA, 2023; NHSA, 2019).

In 2019, with the NHSA recognized as law, it allowed for the creation and development of the Office of the Federal Housing Advocate (FHA) and the National Housing Council (FHA, 2023; NHSA, 2019). The FHA has adopted and is in charge of promoting the right to adequate housing per the United Nations definition of housing adequacy (FHA, 2023; NHSA, 2019). The creation of the FHA was monumental because it was the first time Canadians saw the legislative right to housing in Canada (FHA, 2023). The FHA (2023) aims to review every systemic housing inadequacy claim and make recommendations to the Federal Housing Minister directly or provide timely access to a review panel of the systemic complaint. The National Housing Council was created to promote the participation and inclusion of all housing stakeholders (Biss et al., 2022; NHSA, 2019). The National Housing Council uses data primarily from the Canadian Mortgage and Housing Corporation (CMHC), which the council will advise the housing minister on ways to improve housing outcomes (CMHC, 2022). Unfortunately, years after the NHSA became legislation, significant concerns continue regarding individuals' access to housing rights across Canada (FHA, 2023). Even with the implementation of the NHSA, a disconnect between federal, provincial, and municipal governments grossly contributes to the lack of accountability for adequate housing standards (Ramage et al., 2021).

An analysis of the systemic roots of marginalization is required to endeavour a critical discourse analysis on how the right to adequate housing is discursively situated within municipal housing inspection reports. Governments need to be held accountable for building new policy that aims to improve living standards for community members who face structural vulnerabilities like those of the DTES and similar environments across Canada (Whitzman et al., 2022; Heffernan et al., 2015). Understanding that inadequate housing contributes to poor physical and mental health outcomes, it is staggering to identify that one in five people in British Columbia,

Canada, will experience extreme housing adequacy concerns (Argintaru et al., 2013; Heffernan et al., 2015; Hwang et al., 2011). All levels of government are also responsible for identifying and dismantling oppressive policies that have been normalized. All levels of Canadian government have, at present, exacerbated and predictably facilitated the perpetuation of substandard living conditions for people who live in poverty; this is especially notable in Vancouver's DTES, known as one of the poorest postal codes in North America (Fleming et al., 2023; Heffernan et al., 2015; Singh Kelsall et al., 2023). What has occurred in Vancouver's DTES is slow systemic violence. This violence over a substantial amount of time has created incremental oppression rather than a dramatic newsworthy incident (Lazarus et al., 2011; Heffernan et al., 2015). The exacerbation of housing inadequacy from all levels of government can be expected because there is power in maintaining an oppressive state over particular groups of people, especially regarding those that are situated within the not-for-profit and carceral industrial complexes (Heffernan et al., 2015; Singh Kelsall et al., 2023). Rights-based approaches in legislation as within the NHSA help to re-distribute social power, build structure, grant public legitimacy, shape and identify boundaries, and shape a sense of self.

### **Housing in the Context of Canadian Charter Rights**

Housing rights in Canada fall have the potential to situate under section 7 of Canada's Charter of Rights and Freedoms (CCRF), "the right to life, liberty, and security of the person" (Government of Canada, 2024). And yet, in the last four decades since Canada adopted the CCFR, Canadians' housing security has dramatically decreased due to a widening wealth gap, and in the case of Vancouver's DTES, severe poverty (Farha, 2017; Heffernan et al., 2015). Potential violations of the Charter rights are contrary to the fundamental principles of justice. Canada being a signatory to the United Nations International Covenant on Economic, Social, and

Cultural Rights (UNICESCR) means an international obligation to realize the right to adequate housing in Canada (United Nations, 1966). Aligning with Canada's obligations to the UNICESCR, as discussed above, the National Housing Strategy Act (NHSA) was established, which is arguably more impactful for Canadians than international legislation (NHSA, 2019).

The right to adequate housing could potentially be upheld in section 15 of the CCRF, which emphasizes anti-discrimination and promotes a more equitable and just opportunity for establishing the right to adequate housing in Canada regardless of structural discrimination, including ethnic origin, skin colour, religion, sex, age, and mental or physical disability (Government of Canada, 2024). The CCRF enforces positive governmental obligations to its citizens to “safeguard social and economic rights that are fundamental to human survival, such as the right to housing” (Heffernan et al., 2015, p. 11) Section 15 aims to protect equality for all citizens. According to Heffernan et al. (2015):

For decades, Canada's equality rights jurisprudence has recognized that most discrimination arises not as a result of isolated acts motivated by discriminatory intent but through the operation and persistence of systems and established practices that disproportionately favour dominant groups while disproportionately marginalizing, disempowering, and disadvantaging many groups throughout our communities (p.37).

Reflecting on social perspectives from entities such as the Vancouver Police Department, contracted not-for-profit and private property management companies, and the City of Vancouver (CoV) who frequently refer to community members of the DTES as “challenging to house” (Boyd et al., 2016; Singh Kelsall et al., 2023). This framing has justified the implementation of punitive policies that increase surveillance and control over the community, rather than addressing the structural causes of housing precarity (Boyd et al., 2016; Boyd & Kerr, 2016;

Hwang et al., 2011; Lazarus et al., 2011; Liao et al., 2024). Several successful Supreme Court rulings have challenged the government and property management companies in their failures to provide maintenance to improve housing standards and adequacy as a life necessity within British Columbia (Anthony, 2018; Heffernan et al., 2015).

### **Housing as a Social Determinant of Health**

The social determinants of health (SDH) play a significant role in individual, community, and global health and wellness (Mwoka et al., 2021; Starzomski et al., 2023). There is a strong community of researchers confidently linking inadequate housing conditions to physical and mental adverse health outcomes (Argintaru et al., 2013; Boyd et al., 2016; Garnham & Rolfe, 2019; Mwoka et al., 2021). Some examples of adverse health outcomes and events associated with inadequate housing are an increased risk of overdose death, increased risk of acquiring blood-borne infections, increased risk of substance use and related comorbidities, and generally an untrusting relationship with healthcare services (Fleming et al., 2019; McNeil et al., 2021; Ramage et al., 2021; Shannon et al., 2006). Emphasizing this relationship, Mwoka et al. (2021) state that “housing is a paradigmatic example of a social determinant of health; it influences and is influenced by structural determinants, such as social, macroeconomic, and public policies, education, income, and ethnicity/race” (p. 16). This statement underscores the complex and interconnected nature of housing as a determinant of health, where it both shapes and is shaped by broader socio-economic and policy-driven forces. Understanding housing within the broader framework of social oppression, health status, and human rights is crucial because addressing inadequate housing involves tackling systemic inequities that go beyond neoliberal individualistic evaluations of success and failure, rather requiring multilevel policy intervention (Boyd et al., 2016; Boyd & Kerr, 2016; Evans & Strathdee, 2006; Singh Kelsall et al., 2023).

## **Adequate and Inadequate Housing**

As mentioned above, there is a direct link to both physical and mental health and well-being for those who are sleeping rough or precariously housed, which is exacerbated by the environmental conditions of their housing environments, specifically SRO Hotels (Argintaru et al., 2013; Evans & Strathdee, 2006; Garnham & Rolfe, 2019; Hwang et al., 2011; McNeil et al., 2021; Mwoka et al., 2021). The Canadian Mortgage and Housing Corporation (CMHC) states that housing is considered adequate when the environment is free of major repairs like plumbing, electrical, and any major structural repairs (CMHC, 2022). Thus, if a tenant has never experienced living in a building free from any significant repairs, it may be comprehensible that those individuals may never experience housing adequacy. According to the United Nations definition of adequate housing, housing cannot be considered adequate unless standards of habitability are met, meaning, if housing does not guarantee physical safety and protection against elements like the cold and damp and other threats to health through any structural hazard like vegetation growing on the envelope of buildings (Bayefsky, 2000).

The CMHC (2022) also defines a person or family in core housing need if the person or families housing “falls below at least one of the adequacy, affordability or suitability standards,” housing is only acceptable when all three housing standards are met. Historically, the United Nations covenant has raised red flags about the conditions of Vancouver’s DTES SRO hotels for many years without action from any major governing bodies (Farha, 2017; Kothari, 2009). Adequate housing is a fundamental right acknowledged both internationally by the United Nations and federally within Canada under the NHSA (Biss et al., 2022; Farha, 2017; NHSA, 2019; United Nations, 1966). When assessing adequate housing standards within the DTES, red flags have been raised by researchers and United Nations Special Rapporteurs (Farha, 2017;

Fleming et al., 2023) The DTES reflects strategically created conditions to support and sustain housing precarity, homelessness, and housing inadequacy (Heffernan et al., 2015). The current discourse regarding community members in the DTES is that they are somehow deserving of or only accepting inadequate housing conditions because of their mental and physical comorbidities (Boyd et al., 2016; Fleming et al., 2019; Heffernan et al., 2015; Lazarus et al., 2011).

### **History of Housing Adequacy in Canada**

In Canada, post-World War II, the federal government created one million low-cost homes using government land, calling them ‘victory homes’ (Whitzman & Flynn, 2023). During the time of victory house building, all levels of government participated in the rapid production of housing. Grants and industrial production processes were rapidly approved and the turnaround time for permitting was roughly 36 hours (Whitzman & Flynn, 2023). In the two decades that followed the end of World War II, up to 20% of all the new home and building construction was non-market housing, such as co-op living (Whitzman & Flynn, 2023). In 1980, the average cost of a home for Canadians was around two and a half times that of the household's annual income (Whitzman & Flynn, 2023). In the current study context, in Vancouver, the average cost of a home is roughly fourteen and a half times the annual household income; it’s approximately eight and a half times the household income across Canada (Whitzman & Flynn, 2023).

In the early 1990s, there was a dramatic halt to federal responsibility and involvement in providing adequate and affordable housing to Canadians. Responsibility shifted from joint federal and provincial government support for housing construction to primarily the provincial government. In British Columbia, under provincial watch, there was a significant decrease in non-market housing after 1980 (Whitzman & Flynn, 2023). Coincidentally, or not so, Vancouver’s DTES became progressively more uninhabitable for its community members during

the decades to proceed the 1990s. As the federal government shifted funding responsibilities to provinces and municipalities, it canceled funding for new social housing, withdrew from the administration of affordable rental housing, and phased out cost-sharing agreements for affordable projects (Heffernan et al., 2015). This shift was deliberate and strategically dismantled the security of the person, in clear violation of the Canadian Charter of Rights and Freedoms (Government of Canada, 2024; Heffernan et al., 2015). In 1970, it was the federal government's position that their population would be adequately housed, the current national housing crisis would suggest the federal government's position on adequate housing significantly changed in the decades since (Heffernan et al., 2015).

Furthermore, during the 1990s responsibility for housing shifted from the federal government to the provincial government, and therefore additional pressure was placed on municipal governments. Of note, responsibilities for funding housing fall under the provincial government, especially as it related to social and supportive housing (Whitzman et al., 2022; Heffernan et al., 2015). Municipalities became the primary housing providers and, in quick succession, offloaded housing responsibilities to contracted private and not-for-profit housing providers to manage the limited supportive housing stock within their respective jurisdictions (Heffernan et al., 2015; Singh Kelsall et al., 2023). This timeline suggests a lack of conditional agreements between the provinces and municipalities during this time (Whitzman & Flynn, 2023). Adequate housing standards, as defined by human rights, have become murky. Over time, municipalities have made new construction of supportive, public, and co-op housing particularly difficult by red-taping projects with zoning restrictions and elaborate design requirements (Whitzman & Flynn, 2023). Concurrently, the continued financialization and commodification of

housing that is maintained today is a propping up the housing crisis in Vancouver (Higashihara, 2021).

Financialization, in the context of housing, is a process by which shelter has become a financial asset (Higashihara, 2021). With the financialization of housing in the 1990s came waves of “mortgage borrowing as speculation, and the cumulation of mortgage loans into a speculative asset,” which offered an opportunity for the federal government to “create government-insured mortgage speculation and socialized risk, making the mortgage markets increasingly profitable” (Higashihara, 2021, p. 106). Financialization is exacerbated by policies driven to destabilize socially mixed neighbourhoods like co-op and social housing, which was ever present post-war and destabilized when the federal government divested from social housing in the 1980s (Higashihara, 2021; Whitzman & Flynn, 2023).

The lack of cohesive government action on adequate housing implementation has led to a continued acute threat to tenant safety generally in Canada and, more specifically, in Vancouver (Higashihara, 2021). Literature over the past two decades has criticized the neoliberal policy decisions that prioritize housing as a financial asset over shelter, coupled with the continued divestment and deregulation of the non-market housing stock like co-op housing in Canada, as the driving forces of the housing crisis, with poor and middle-income Canadians carrying the heaviest burdens of housing insecurity and housing stress (Boyd et al., 2016; City of Vancouver, 2022; Evans & Strathdee, 2006; Higashihara, 2021; Ramage et al., 2021; Singh Kelsall et al., 2023). Supportive housing is a term often woven into housing policy and social perspectives; it infers that the tenants of these buildings have fewer housing rights and that there might be support for tenants offered in these buildings (Singh Kelsall et al., 2023). Neoliberalism in Canada has also significantly contributed to social and economic inequity by placing a market

value on social policies like supportive housing (Centre for Equality Rights in Accommodation & National Right to Housing Network (CERA & NRHN), 2022).

### **Municipalities and Housing**

Municipal governments are unique in their proximity to the population's housing needs. With the National Housing Strategy Act (NHSA) landmark legislation, municipalities were challenged with direct responsibility for housing program creation and maintenance, urban planning to address housing adequacy unique to communities, and building maintenance in adequacy defined by the right to housing standards enforcement (Schwan & Perucca, 2022). Despite being on the front line of addressing housing challenges, municipalities often face barriers to providing and maintaining adequate housing, including limited competencies, revenue, and missing policy frameworks that are human rights-based, necessitating a closer examination of their role in actualizing the right to housing with tangible outcomes (Andersén et al., 2023; CMHC, 2022). The most vital aspect of municipal involvement in realizing the right to housing is establishing a robust human rights infrastructure (Schwan & Perucca, 2022). Municipalities are responsible for providing basic needs to survive, including housing and homeless shelter programs (Schwan & Perucca, 2022). Within the NHSA and the literature on the issue of housing adequacy in Canada (Farha, 2017), it is understood that the principle of the right to housing is insufficient in actually ensuring housing adequacy without the legislative policy architecture to implement and defend it, including tenancy rights (Bueckert, 2023; CERA & NRHN, 2022; Falvo, 2022; Schwan & Perucca, 2022; Visotzky, 2023).

Evictions, including from supportive housing, pose a pressing crisis that necessitates proactive measures at the municipal level (Fleming et al., 2019; McNeil et al., 2021). Screening programs, data analysis, emergency financial support, and improved legal access are crucial for

municipal eviction initiatives (Andersén et al., 2023). Though there is a clear need for municipalities to oblige to the right to housing, attention should be paid to the constraints in fulfilling these housing obligations, such as the unaffordability of housing, emphasizing the need for federal and provincial policy changes to empower municipalities in preventing the commodification of housing and preserving affordable housing stock, which is not the current policy priority (Centre for Equality Rights in Accommodation & National Right to Housing Network, 2022; C. Whitzman & Flynn, 2023; D. C. Whitzman, n.d.).

The right to housing finds realization in the intricate interplay between municipal, provincial, and federal governments (Andersén et al., 2023; Centre for Equality Rights in Accommodation & National Right to Housing Network, 2022; Schwan & Perucca, 2022). Despite municipal proximity to housing challenges, municipalities often lack competencies and funding in providing adequate housing, necessitating collaboration among the three levels of government. Municipalities are not completely powerless in the creation of adequate housing. Some suggested strategies to improving adequate housing in Vancouver include, the municipality removing exclusionary zones and including inclusionary zoning (Whitzman et al., 2022). Meaning, zoning can be used as a tool to maximize use of land, a limited resource, to support people who have previously generally been excluded by having less power and wealth (Whitzman et al., 2022). The discourse on municipalities' role underscores a multifaceted approach involving distinct yet interconnected responsibilities. Within the literature, three primary dimensions characterize municipalities' rights and obligations in housing provision: social responsibility and duty to accommodate, individual support and the commitment to facilitate market entry, and market facilitation and the pursuit of efficiency (Andersén et al., 2023). Municipalities bear a distinct social responsibility in accommodating specific

demographic groups, facing economic or social challenges, and rectifying market failures (Andersén et al., 2023; CERA & NRHN, 2022; Schwan & Perucca, 2022).

In navigating this complex terrain, municipalities must reconcile sometimes conflicting objectives to formulate housing provision strategies that cater to the diverse needs of their population. Addressing ambiguities and inequities requires a nuanced understanding of the interplay between social policy, land use planning, and market facilitation in pursuing housing justice and inclusivity.

### **The Downtown Eastside: Study Context and Social Constructions**

Tenants often describe SRO hotels as barely an improvement over homelessness, with some tenants choosing to sleep outside to escape their SRO living conditions (Hwang et al., 2011; St. Denis, 2021; St. Denis, 2022a). Extreme poverty, crumbling building structure, and ever-present general decay of SRO hotels have been common social perceptions of Vancouver's DTES for years (St. Denis, 2020; St. Denis, 2021; St. Denis, 2022b; St. Denis, 2023).

Neighbourhoods are deeply interconnected with their residents' health, safety, and well-being, including the tenants of SRO hotels in the DTES (Garnham & Rolfe, 2019). Vancouver's DTES, a neighbourhood that has long been subject to public, policy, and institutional scrutiny, is often portrayed as unsafe, plagued by drug-related issues, and resistant to reform (Boyd et al., 2016; Heffernan et al., 2015). Institutional watchful eyes have progressively increased over time in the DTES. Increases in how the community is surveyed and controlled have often been small. Thus, restrictions to Charter rights, United Nations International Covenant on Economic, Social and Cultural Rights (UNICESCR) guidelines and more currently the National Housing Strategy Act (NHSA), on the right to adequate housing standards go relatively unnoticed. Examples of this include tracking key fobs, locked entrances, multiple cameras, increased security presence, the

requiring of guests to provide government identification, and increased police patrol of the community (Boyd et al., 2016).

Policy has been primarily driven by the language of criminality in Vancouver's DTES, and the VPD and other institutions like the municipal government and health authorities have been significant stakeholders in the implementation of housing policy in the DTES. Language of criminality is critiqued by Boyd et al. (2016) as coercive and perpetuates the expanding dominance of police interest, much like the surveillance used throughout the carceral system. Most social housing built after 1990 was not built with the DTES population in mind, leaving many community members to live in spaces that would otherwise be considered condemnable (Liao et al., 2024). Instead of addressing the need for safe, adequate housing, stakeholders often focus on controlling the 'criminal element' they associate with poverty (Linden et al., 2013).

In 2022, the City of Vancouver (CoV) published the Housing Needs Report, which indicated that housing stress, a symptom of increased housing need, is evaluated by three major indicators: suitability, adequacy, and affordability, in accordance to the United Nations standards of housing adequacy (City of Vancouver, 2022). If one of the three indicators is unmet, a person or family has an increased housing need and subsequently will have greater housing stress (City of Vancouver, 2022). In 2022, when this report was published, the authors identified "approximately 77,000 households in Vancouver experiencing housing need due to unaffordable, unsuitable, or inadequate housing as reported in 2016 Census data, plus approximately 2,000 individuals experiencing homelessness and 7,000 people living in Single-Room Occupancy hotels" (City of Vancouver, 2022, p. 50). The report includes that while the numbers are approximate, there is likely a greater number of homeless or precariously housed people in Vancouver because there is a gap in data collection among the community who experience

housing precarity or homelessness (City of Vancouver, 2022). An increase in housing precarity and homelessness of 32% over ten years is a substantial standout point of the report (City of Vancouver, 2022). Considering the roughly 85,000 Vancouverites that are currently in housing need, there are another approximately 50,000 people projected to have future housing needs in the next ten years (City of Vancouver, 2022, p.50). The Housing Needs Report and other literature suggest that SRO hotels are a last resort option for the most vulnerable members of our communities (City of Vancouver, 2022; Heffernan et al., 2015; Hwang et al., 2011; St. Denis, 2020; St. Denis, 2021). The authors of the 2022 Housing Needs Report suggest that housing adequacy is reported by tenants through Census data (City of Vancouver, 2022). It is important to acknowledge that this data may be misrepresented as the authors indicate the population that tenants SRO hotels often do not have the means to complete census data, as often these tenants housing and address may be precarious (City of Vancouver, 2022).

### **A Community Under Surveillance**

The Vancouver Police Department (VPD) has exerted considerable influence over housing policy, reshaping institutional arrangements and practices concerning how DTES community members, particularly those residing in SRO hotels, are housed (Boyd et al., 2016). The language used in policies influenced by the VPD tends to encourage and advocate for more regulation and surveillance of the DTES community, an already heavily watched Vancouver neighbourhood (Boyd et al., 2016; Boyd & Kerr, 2016; Heffernan et al., 2015). The omnipresence of law enforcement in the area often shifts attention away from the structural issues of inadequate housing, framing the residents themselves as problematic, thus justifying increased control over their activities (Boyd et al., 2016; Heffernan et al., 2015). This approach not only normalizes the poor living conditions in places like SRO hotels but also contributes to a

broader discourse that sees the residents as undeserving of improved housing (Heffernan et al., 2015; Pivot Legal Society, n.d.).

Surveillance in the DTES extends beyond mere regulation and contributes to a naturalized discourse where constant policing is considered necessary to maintain order (Linden et al., 2013). However, this focus of surveillance diverts attention and resources from addressing the root causes of poverty and housing inadequacy. As Linden et al. (2014) highlight, the pervasive policing of populations faced with structural inequities only exacerbated health disparities and creates an environment of mistrust, particularly among Indigenous and racialized groups who are disproportionately affected by both housing instability and police interactions (Statistics Canada, 2024).

Some literature from the United States suggests that SRO hotels, similar to those in Vancouver's DTES, generate crime due to their problematic design, with low security, broken locks or other structural damages, and direct access to other tenants via shared facilities can increase the risk of violence or other criminal activity (Krupa et al., 2021). However, this type of framing risks reinforcing the prevailing institutional and social discourse that associates community members living in severe poverty with criminality (Boyd et al., 2016; Krupa et al., 2021; Linden et al., 2013). This type of narrative, which paints low-income individuals as inherently predisposed to committing crimes or being "difficult to house," is commonly perpetuated by key policy stakeholders in Vancouver, such as the VPD (Fleming et al., 2019; Heffernan et al., 2015).

The social perspectives circulating about the DTES are not merely a reflection of the physical conditions of the buildings but stem from broader societal assumptions about poverty, mental health, and addictions. Boyd et al. (2016) argue that "urban poverty, addiction, and

mental health are constituted shapes the type of social housing made available and the spaces they occupy” (p. 78). In this context, SRO hotels are not just seen as inadequate housing options but as spaces where criminality is expected to thrive. These assumptions reinforce a cycle where policy responses focus on regulation and surveillance rather than addressing the root causes of the inadequate housing that drives tenants into precarious living conditions. Moreover, the construction of criminality around SRO hotels serves to justify the continued neglect of these buildings (Heffernan et al., 2015).

### **Non-Profit SRO Hotel Oversight**

In the DTES, where structural barriers and a spectrum of violence affect nearly every person in the community, the influence of the non-profit housing industry is left to thrive, and more so, impact peoples lives. The non-profit landscape in the DTES is characterized by numerous organizations, including community health centres and housing providers, that operate within the non-profit industrial complex (Singh Kelsall et al., 2023). The Societies Act regulated the incorporation and operation of non-profits in British Columbia, including those involved in property management (Societies Act, 2015). Historically, ambiguity surrounding the protection of supportive housing and the private/non-profit SROs in the Residential Tenancy Act (RTA) has added to the uncertainties regarding tenants’ rights to adequate housing (Singh Kelsall et al., 2023).

This support often includes services such as medication management programs, assistance with appointment reminders, and room safety checks, among other programs (BC Housing, 2024; Singh Kelsall et al., 2023). While these services are considered beneficial, the term ‘supportive housing’ can be misleading. The name suggests that the primary purpose of such housing is to provide support, but it often conceals the heightened surveillance and control

mechanisms imposed on residents (Singh Kelsall et al., 2023). As mentioned in my example from my experience outreaching these buildings, supportive housing in Vancouver's DTES includes strict rules that significantly reduce tenant rights compared to market housing (Singh Kelsall et al., 2023; St. Denis, 2022a). Tenants are frequently subjected to intrusive measures such as regular room inspections, curfews, and stringent guest policies, which limit their ability to maintain privacy and live freely, a Canadian charter right for every person in Canada (Boyd et al., 2016; Fleming et al., 2019; Government of Canada, 2024; Heffernan et al., 2015). Moreover, tenants are required to show identification for themselves and any guests before entering their buildings, policies that would be seen as unjustifiable in market housing environments (Fleming et al., 2019). While these rules are purportedly for safety and support, they simultaneously undermine tenants' autonomy and reinforce a dynamic of control that equates poverty with criminality or deviance. The term 'supportive housing' thus becomes a misnomer, as it implies benevolence but often results in increased surveillance and restrictions (Boyd et al., 2016; Sylvestre et al., 2017). Rather than providing a sense of empowerment, this housing model frequently prioritizes managing tenants' behaviours, thus reinforcing the notion that tenants are incapable of self-regulation without institutional oversight (Singh Kelsall et al., 2023).

Non-profit property management groups, particularly in the healthcare sector, face challenges in balancing their commitment to community well-being with the restrictive mandates of the funding sources; the CoV is an example of institutional power holding housing budgets (CERA & NRHN, 2022; Schwan & Perucca, 2022; Singh Kelsall et al., 2023). The non-profit industrial complex is driven by neoliberal values and the competition for public dollars, driving the corporatization of healthcare and housing, which inevitably compromises the ability of non-profits to anticipate and respond to emergent local crises (Andersén et al., 2023; Singh Kelsall et

al., 2023). The literature on the non-profit healthcare and housing sector implies that the low-compensated labour force, stringent performance indicators, and chronic labour shortages further impact the quality of care these organizations can provide to tenants and community members of the DTES (Olding et al., 2021; Barker, et al., 2021; Xavier et al., 2022). In the DTES, where the need for comprehensive and culturally specific health interventions is crucial, the fiduciary power of settler-colonial public agencies interferes with the concept of health and housing sovereignty.

Moreover, non-profit property management groups often operate within a framework that prioritizes accountability to the state and wealthy funders or institutional powers over the community needs (Boyd et al., 2016; Singh Kelsall et al., 2023). The competition among non-profits vying for public dollars may undermine collaborative efforts to ensure community members can access a broad range of services that fit their unique needs (Singh Kelsall et al., 2023). The complex interplay of funding dynamics, competition, and accountability may compromise the potential for these organizations to address the diverse and pressing needs of populations facing structural inequities in the DTES. There is a dire need to evaluate the funding structures, accountability to adequate housing, the prioritization of community-driven solutions, and bridging the knowledge-sharing gaps to enhance the effectiveness of non-profit property management when discussing actualizing the right to adequate housing within this active complex.

### **SRO Hotel Housing in Vancouver's Downtown East Side**

SRO Hotels in the DTES were built in the early 1900s to temporarily house seasonal workers in Vancouver (Cheung, 2019). In recent decades, SRO hotels have been used as a supportive housing initiative to house people who often face the most significant structural

inequities and systemic violence (McNeil et al., 2021). A standard SRO room in the DTES is roughly 100 square feet, and toilet, shower, and kitchen facilities are shared (Fleming et al., 2019; Griffiths, 2023; Shannon et al., 2006). On the outside, these buildings appear to have a century character aesthetic, effectively hiding the rotting inside. Most of the SRO hotels in the DTES are infamously poorly maintained (Griffiths, 2023; Shannon et al., 2006; St. Denis, 2021). SRO hotels continue to be the primary source of accommodation despite the knowledge of their substandard environmental and structural conditions (Fleming et al., 2019). The average rent is \$681 in 2023, a 21% increase from the SRO stock in 2019, the cost of the 100-square-foot room ranges based on private or non-profit contracts (City of Vancouver, 2023). Rents can be as low as \$375, which the Ministry of British Columbia will subsidize for rent while a tenant is on ministry financial assistance (BC Housing, 2024; City of Vancouver, 2023). The price per square foot calculation of market price divided by 100 gives a range of pricing per square footage for an SRO room with an average square footage of 100 square feet of \$3.75-6.81 price per square foot. The average price per square foot for renting housing in Vancouver is \$4.02 per square foot, and Metro Vancouver is \$3.06 per square foot (Shepert, 2023). SRO rooms are rented for above the average cost per square foot region-wide.

As a result of the lack of accountability in maintaining structural safety, infestations of rodents and bugs are a common occurrence that plague the tenants of these SRO Hotels (St. Denis, 2021). Tenants that occupy them have also described SRO hotels as only a slight step up from homelessness (Fleming et al., 2019; St. Denis, 2021). People who have lived in SRO hotels in Vancouver have said, “healthcare providers don’t take the problems of people living in poor housing seriously enough, or dismiss their illnesses as drug-related” (St. Denis, 2021, para. 6). Specifically, the deteriorating SRO hotels under investigation in this research have all had

complaints and allegations from tenants of infestations, unclean drinking water, black mould, and structural damage like floors caving in (St. Denis, 2020; St. Denis, 2021; St. Denis, 2022c). In an article by The Tyee, a local news outlet in Vancouver, the reporter notes that “to get a good night’s sleep, [an SRO resident] said he sometimes sleeps outside or at a warming centre in the winter” (St. Denis, 2021, para. 32).

SRO hotels in the DTES have gone relatively unregulated, significantly contributing to Vancouver’s housing crisis. Fleming et al. (2019) suggest that “experiences of social and structural inequities [have] employed the concept of structural vulnerability to capture how positionalities or social locations within social hierarchies and networks of power can produce increased vulnerability among certain groups of people” (p. 170). Access to housing justice for people who experience housing injustice is critically understudied. Another element that has gone critically understudied and is of focus in this research is institutional language dominance within the system of structural maintenance standards between dominating power structures, such as municipalities and housing providers.

### **SRO Hotel Habitability**

Vancouver has a lengthy history of challenges enforcing bylaw maintenance standards against SRO hotel private and not-for-profit property management groups (St. Denis, 2020). An example of the City of Vancouver’s (CoV) failure to enforce bylaw citations is the acquisition of two privately owned SRO hotels that housed 300 tenants in the DTES. The CoV condemned two SRO hotels in 2017 because of the extreme nature of the decay and dilapidation. The CoV had continuously cited the owners of the Balmoral and Regent hotels for structural safety concerns, which were ultimately left incomplete before condemning the hotels. The two SRO hotels have

sat unmaintained, empty, and rotting, condemned for years before the CoV eventually acquired the buildings in 2020.

Tenants report living days on end without heat and water, fearing they will die if a fire erupted in their buildings (St. Denis, 2020). Fire safety is the most commonly reported safety issue in SRO hotels, per an article by Griffiths (2023) which used similar data released through the Freedom of Information (FOI) request system with the CoV. In Griffith's article, threats to 'life safety' included fire alarm system failures, fire and exit corridors not up to code, sprinkler system failures, and often fire extinguishers left requiring replacement for months to years. Besides these concerning fire threat issues, worries about wall, ceiling, and general maintenance are often left unaddressed for hundreds of days after bylaw citations (Griffiths, 2023).

If the closure of two large private SRO hotels in 2017 due to serious concerns about fire safety were not alarming enough, the deadly fire at the Winter's hotel should be. The Winter's is a privately owned SRO hotel managed by a local housing provider (St. Denis, 2023). The Winter's hotel burned to the ground in 2022, killing two and displacing over 100 others (St. Denis, 2023). In 2022, SRO fires more than doubled, and of people were displaced, further contributing to Vancouver's atrocious housing crisis (St. Denis, 2022c; St. Denis, 2023). Hundreds of low-income SRO units have been lost in Vancouver's DTES since 2017 via fires and extreme disrepair; all tragic and preventable displacements and deaths could have been avoided by effective building maintenance standards enforcement and accountability (Fleming et al., 2019; Griffiths, 2023; St. Denis, 2023). Boyd et al. (2016) assert a stark reminder that the DTES is a "socially produced and contested space constructed by neoliberal economic policies, policing, and health and housing initiatives, municipal, provincial, and federal policies" (p. 73).

The uncertainty regarding tenants' right to housing being brought to fruition is muddied further by the Residential Tenancy Acts' (RTA) imposition towards SRO hotels. In BC, if you rent your home, you are likely protected by the RTA, which outlines tenants' and landlords rights and responsibilities. Supportive housing and SRO hotel housing rights under the RTA are not so clear (RTA, 2002). My research focuses on one of Vancouver's non-profit property management companies (PMC), which operates the largest number of SRO hotels in Vancouver's DTES (St. Denis, 2024). In particular, this PMC has an infamous history of failing to address health and safety building inspection violations, paying workers lower wages, and operating without accurate budgets (Boyd et al., 2021; Olding et al., 2021; St. Denis, 2020; Xavier et al., 2022). Yet, this PMC operates the largest number of SRO hotels in Vancouver, with seemingly non-existent oversight from the CoV (Chan, 2020).

It is possible that SRO inspection reports might support the maintenance of social hierarchies and oppressive power over people who face structural inequities through ideology within the inspection reports discourse. The documents in this research include environmental and structural building assessments, directions to satisfying By-law violations, and correspondence with SRO hotel employees. De-coding the language used by inspectors and within the documents themselves offers a nuanced insight into the limits, barriers, and abilities of the CoV in holding PMC and landlords accountable for upholding and actualizing the right to adequate housing for all (Fairclough, 1985). While only brief overviews of the structural danger that SRO hotel tenants are in have been covered in the news, little has been analyzed about how 'street-level bureaucrats,' who are tasked with upholding the progressive continued oppression of people who face structural inequities (Lipsky et al., 2006). The context presented in this chapter position critical discourse analysis as an appropriate tool to illuminate the social and structural

powers that underpin societies institutions and class systems (Slemon, 2025). Thereby, influencing social services, like housing, practices and tenant experiences (Slemon, 2025). My research was completed to address how adequate housing is discursively positioned within SRO health and safety building inspection reports and how those institutions have been able to maintain sub-adequate housing by naturalizing discursive ideological formations to keep power within the hegemony of the extreme poverty in the DTES.

### Chapter Three: Methods

By analyzing the language and narratives used in the inspection reports, this study seeks to reveal the underlying power dynamics and ideological constructs that influence the regulation and oversight of SRO hotels. This approach highlights the immediate health and safety issues and provides insights into the broader socio-political context that shapes housing policies and practices. Fairclough's Critical discourse analysis (CDA), offers a robust methodological framework for exploring the relationship between language, power, and ideology (Fairclough, 1985). It enables a detailed examination of how discourse reflects and perpetuates society's values, making it an ideal tool for analyzing housing regulation's complex and often contentious field. Fairclough (2013a) defines discourse as "any spoken or written language use conceived as social practice" (p.71), emphasizing that discourse is not neutral but embedded within social institutions that shape and regulate meaning. Fairclough orients discourse analysis within social institutions. According to Fairclough, institutions do not always overtly signal their hierarchical status or dominance, making it possible for dominant ideologies to be embedded in seemingly neutral policies, regulations, and bureaucratic procedures (Fairclough, 2013a). Texts within Fairclough's CDA are considered any excerpt of language within a social institution that a researcher can analyze to visualize and disrupt the naturalization of oppressive ideology from the institution (Fairclough, 2013a, 2013b; Fairclough, 1985). In this chapter, I will first provide a detailed assessment of CDA and its value as both a theoretical framework and research methodology for this study. Second, I present how CDA was used in examining and critiquing a selection of texts, including a detailing of the texts for this research. Third, I present a review of the data analysis process. Finally, I will establish the ethical considerations taken to proceed with this research.

## Critical Discourse Analysis

CDA emphasizes the study of discourse as a form of social practice, with a distinct focus on social justice (Fairclough, 1985). CDA is both a theoretical framework and a research methodology used to analyze discourse from a critical perspective. (Bloor & Bloor, 2007; Fairclough, 2013b; Fairclough, 1985). While there are many specific approaches within the overarching theory and methodology of CDA, this research draws on Fairclough's CDA to explore how adequate housing is discursively positioned and uncover naturalized ideologies within the City of Vancouver (CoV) *SRA Building Health and Safety Inspection Reports* and the potential contribution of the discourse within these bureaucratic reports to the maintenance of social hierarchies and oppressive power over a particular group of people. Within Fairclough's CDA, discourse is defined as both a product of and a means through which power and ideology are expressed and reproduced within society (Fairclough, 1985). Thus, CDA situates discourse within its historical, social, and institutional contexts, revealing how power operates within and through language. Ideology, Fairclough (1985) argues, is a distinct system of ideas, beliefs, and representations which serve a particular ruling or dominant class. However, ideology does not function in isolation; it operates within structured systems of discourse that govern how meaning is produced and circulated (Fairclough, 2013a, 2013b). CDA introduces the concept of 'orders of discourse,' which refers to the institutionalized and hierarchical structural that regulate and constrain discourse. Orders of discourse refers to the broader systems that determine which discourses are considered legitimate, authoritative, or marginal (Fairclough, 2013a, 2013b; Fairclough, 1985). Fairclough (2013a) suggests ideologies, "develop within capitalist societies and are dominated by the ruling class, shaping social and political structures," which fits against the housing system in the DTES (p. 25). According to Fairclough (1985), power is exercised by

and enacted through the control of discourse. Power is thus enacted, maintained, and transformed through ideologies, and these ideologies manifest in specific language forms and discourses, which CDA seeks to uncover (Fairclough, 1985).

The overarching aim of Fairclough's CDA is to uncover power relations embedded within language and how those relations are represented and maintained in society through discourse (Fairclough, 1985). Fairclough's CDA begins within 'context,' wherein researchers situate their exploration of discourse within background knowledge on the topic (as this thesis has done within Chapter Two). Fairclough (1985) argues background knowledge absorbs "naturalized" ideological representations that are widely accepted in society as common sense, and therefore depicted as non-ideological in nature (p. 738). These ideological assumptions often align with the dominant ideologies of institutional powers within society, which benefit particular groups at the expense of others (Fairclough & Fairclough, 2012; Fairclough, 2013a; Fairclough, 1985). A primary goal of CDA is to identify 'who' holds power to identify and resisting naturalized ideological discursive formations (IDFs). In Fairclough's (1985) framework, IDFs emerge from dominant 'orders of discourse.' Orders of discourse refer to how power is exercised through language within specific domains or institutions (Fairclough, 2013a, 2013b; Fairclough, 1985). These orders of discourse reflect and perpetuate hegemonic ideologies, contributing to establishing IDFs (Fairclough, 1985).

CDA means to critique and means to create positive change and encourage solution-based interventions (Fairclough, 1985). Fairclough's central question lies in how language is used to perpetuate or challenge dominant IDFs and scrutinize linguistic features used within naturalized text within institutions (Fairclough, 2013a, 2013b; Fairclough, 1985). Using CDA, offers critique of the broad socio-political and cultural contexts and social, historical, and institutional factors

that have influenced the repetition and maintenance of opaque institutional IDFs as it relates to the right to adequate housing for people who face structural vulnerabilities living in SRO hotels in the DTES. This research was designed to disrupt the status quo and advocate for human rights, aligning with the foundations of CDA. This research has examined By-law 5462 inspection reports conducted between the CoV and the PMC of three deteriorating SRO hotels in Vancouver's DTES. CDA was used to identify hidden and absent IDFs within these inspection reports to highlight the maintenance of particular ideologies while silencing others, as in the tenants of SRO hotels (Fairclough, 2013b).

In this study, CDA is utilized to enhance understanding of how power operates within texts, photos, emails, and inspection report forms excerpts taken from 'SRA annual Inspection Report Forms' and associated communication with the PMC from the three previously discussed SRO hotels in Vancouver's DTES. This methodological approach allows for a comprehensive analysis of how power is embedded in housing discourses within institutions like the City of Vancouver and how these discourses shape social practices related to housing and regulations in the DTES. Fairclough's concept of ideology is central to this analysis. Both Fairclough's theoretical insights and practical tools from scholars like Bloor and Bloor (2013) allow for a comprehensive analysis of bureaucratic discourse shape social practices related to housing rights and regulations in the DTES.

Using Bloor and Bloor's (2007) pragmatic approach to undertaking CDA, I began by identifying the central 'problem: actualizing the right to adequate housing in Canada, specifically for tenants of SRO hotels in Vancouver's DTES. According to Bloor and Bloor (2007), the 'problem' in a CDA study typically refers to the research question or the main issue the analysis aims to address. In this study, the problem is how dominant institutions, such as the CoV and the

PMC, maintain power dominance through discursive practices embedded within the creation and enforcement of city by-laws. These discourses contribute to sustaining unequal power relations and perpetuate control over a population facing structural inequity. Further, this analysis examines how these entrenched power dynamics enable SRO hotels to continue operating under substandard conditions, maintaining a state of inadequate housing that disproportionately impacts a specific population facing ongoing structural oppression.

### **Selection of Texts**

This research utilizes Fairclough's CDA to uncover IDFs within the text and photo excerpts from the *SRO Annual Inspection Reports* from the three deteriorating SRO hotels and follow up communication within the two institutional powers, the City of Vancouver (CoV) and the Property Management Company (PMC) identified that maintain the dominant power over the tenants whose right to adequate housing is not being actualized. On June 11<sup>th</sup> 2021, a journalist in Vancouver filed a Freedom of Information (FOI) request with the CoV, and then provided me with the data set for this research. The journalist has provided explicit consent to use the FOI material he filed for this research. The journalist had initially filled the FOI in response to the increase in fires causing deaths, displacements, and injuries within SRO hotels in Vancouver's DTES (Griffiths, 2023; St. Denis, 2021; St. Denis, 2023). Further, rumours of major structural building integrity complaints going months without appropriate intervention prompted the journalist's initial intention to file the FOI (Griffiths, 2023; Simpson, 2023). The journalist could not use the FOI material in a timely manner; however, he wanted the data to be used to bring awareness to the structural health and safety of buildings in Vancouver's DTES. The journalist was then introduced to me through a colleague and Simon Fraser University Doctoral candidate Tyson Singh Kelsall. Singh Kelsall and I worked together within a large Vancouver Health

Authority on an outreach team situated in the DTES. Based on our academic trajectories and objective experiences in the community, the FOI data was presented to me for this master's thesis.

An FOI falls under the Freedom of Information and Protection of Privacy Act, where the public can request access to and review British Columbia's government records (Ministry of Citizens' Services, 2023). The information requested under this Act includes information about government activities or programs, including building inspection reports between the CoV and the PMC that provide 'supportive housing' to a community that already faces immense structural barriers. The FOI explicitly sought the CoV's building safety database inspection reports and communication about those violations in the reports between the CoV and the PMC between 2019-2021. These dates were of specific interest as they were believed to capture a period of deteriorating conditions in SRO hotels leading up to a newsworthy increase in severe and displacing fires in 2022 (St. Denis, 2022c; St. Denis, 2023).

The FOI filed by the journalist provided city-level building health and safety inspection data for four deteriorating SRO hotels: SRO hotel 1, SRO hotel 2, SRO hotel 3, and SRO hotel 4. Documents that referenced SRO building maintenance, health, and safety were the primary inclusion criteria for both the filing of the FOI request. The inclusion criteria was of interest because, as discussed in our background knowledge, it is understood that the problems of building maintenance, housing adequacy, health, and fire safety have been prominent long-standing concerns for several decades in Vancouver's DTES supportive housing network (Griffiths, 2023; St Denis, 2020; St. Denis, 2021; St. Denis, 2023). These inclusion criteria spotlight the severity of the inadequacies under the human right to housing.

The FOI resulted in four SRO hotels' case files for their 2019-2021 'Standards of Maintenance By-law – [year] Annual SRA Inspection.' Reports for four SRO hotels were provided through the CoV FOI: SRO hotel 1, SRO hotel 2, SRO hotel 3, and SRO hotel 4. SRO hotel 4 data was excluded from this analysis as the 156 tenants of SRO 4 hotel had been displaced for major renovations to communal areas like the kitchen and shared bathrooms in the fall of 2022 (St. Denis, 2022a). SRO hotel 4's data was excluded as this data set had a resolution in action, as in, the property managers could not have the building tenanted while completing such critical structural repairs, like new building-wide piping, after repetitive citations, the property management company (PMC) applied for an upgrade grant with the City of Vancouver (CoV) for major structural repair (General Manager of Arts, Culture, and Community Services (GMACS), 2022). The other three SRO hotels remain in operation today, under the same PMC, remaining in their decrepit conditions.

SRO hotel 1's report was 196 pages, SRO hotel 2's report was 111 pages, and SRO hotel 3's report was 1166 pages for this analysis. Each SRO hotel report consisted of multiple types of documents, including the following: "Property Use SRA Inspection Reports," "Case Files," "SRA Annual Inspection Reports – Standards of Maintenance By-law 5462", "CE Inspection Reports," City of Vancouver "Orders", Contractor Declaration Forms, City of Vancouver – Development, buildings, and licensing "Charges laid" forms, among others. According to Fairclough, texts such as the CoV inspection forms can normalize and perpetuate oppressive practices within communities where tenants face significant structural vulnerabilities (N. Fairclough, 2013b; N. L. Fairclough, 1985). Due to the time constraints of a master's thesis, I have limited the texts for data analysis to the following: email communication, on-site inspections, and photos generated from the *SRA Annual Inspection Reports – Standards of*

*Maintenance By-law 5462* data. I have left out orders and By-law specific violation categorizations.

### **Data Analysis**

CDA employs various analytical techniques that are complementary rather than mutually exclusive (Bloor & Bloor, 2007). The primary objective of Fairclough's CDA is to critically examine how language and discourse contribute to the normalization of social inequities and the maintenance of power hierarchies within social class systems while also offering pathways for social change (Bloor & Bloor, 2007; Fairclough, 2013b). This approach is central to identifying and deconstructing hidden Ideological Discursive Formations (IDFs) (Fairclough, 1985). IDFs emerge from dominant orders of discourse which reflect and perpetuate hegemonic ideologies, contributing to establishing IDFs (Fairclough, 1985). Although Fairclough provides a comprehensive foundation of the relationship between language, power, and ideology, Bloor and Bloor's (2007) step-by-step approach was utilized to provide a more structured and practical application of CDA to the text. Bloor and Bloor (2007) break down complex systems into actionable research methods. Their methodological framework can be summarized into six steps: identifying the social issue and context, selection of texts for analysis, analyzing textual features, examining discursive practice, exploring the social practice, and interpreting the findings. In this research, I critique the opaque in the FOI material, which are detailed in the selection of texts section.

To analyze the habitability and discursive positioning of adequate housing within power structures such as institutions like PMCs and municipal authorities, it was essential to understand the lived experiences of the tenants of SROs through Chapter Two's literature review. Also establishing where SROs are situated within housing in Canada and to understand how adequacy

is defined within housing as a human right aforementioned in Chapter Two. The analysis began with a comprehensive review of the By-law investigation reports for the three selected SRO hotels: SRO hotel 1, SRO hotel 2, and SRO hotel 3. This first pass allowed for identifying preliminary discursive categories, similar to codes, that would guide the organization of valuable data, including phrases, words, forms, and photos specific to each SRO hotel. Subsequently, more detailed sub-categories were created within each main discursive category based on recurring ideologies and patterns observed during further reads. These sub-categories included ‘dates opening and closing violations,’ ‘security and surveillance,’ ‘standards of maintenance by-law and adequacy statutes,’ and ‘remaining violations after extended time.’

The next stage involved an in-depth extraction process, where relevant data points were meticulously captured through screenshots of inspection documents and subsequent communication regarding violations was annotated, and systematically saved within their respective discursive subcategory folder system on a local hard drive. This organizational structure enabled precise data categorization, ensuring each document was stored under a relevant discourse subcategory based on ideology within the document type. Although logistical placement was necessary to manage large volumes of data, the primary focus was on continuously applying Fairclough’s CDA framework from the initial stages of data extraction. This approach ensured that the analysis was rooted in identifying key discursive categories and subcategories within the texts, such as references to surveillance, regulation, the framing of tenants, and missing discourses. Once all relevant data had been discursively categorized and ultimately refined, two overarching ideological discursive formations became visible, which will be discussed in detail in Chapter Four: Findings.

## **Ethical Considerations**

This research was deemed exempt from the University of Victoria Human Research Ethics Committee through the governing policy TCPS2 and the committees' ethics policies and guidelines, board of Governors research policy RH8100, board of Governors regulations for research involving humans RH8105, and Tri-Council Policy Statement on the Ethical Conduct for Research Involving Humans TCPS2 (2022). The ethics waiver may be found in the Appendix. The ethics committee provided the following reasons for exemption: In this case, a journalist initially obtained the materials via an FOI for the journalist's work, and I received explicit permission to use the FOI material. The CoV has also made the SRO hotels 1 FOI report public, although other reports have not been released. Finally, the names of employees have been redacted as they are not relevant to this research. The tenants names were previously redacted by the CoV through their FOI process.

## Chapter Four: Presentation of Findings

In this chapter I present the critical discourse analysis (CDA) findings on SRO hotels 1, 2, and 3 building inspection reports in Vancouver's DTES. By analyzing these texts, I aimed to uncover both the visible and hidden ideological discursive formations (IDF) that perpetuate sub-adequate housing conditions and structural inequities faced by the tenants of SRO hotels. The analysis is anchored in Fairclough's CDA framework, which emphasizes the role of discourse in maintaining power dynamics and social norms (Fairclough, 2013b; Fairclough, 1985).

The findings highlight the key IDFs identified within the inspection reports, demonstrating how opaque IDFs within institutions naturalize oppressive discourse supporting the maintenance inadequate housing for tenants facing structural inequity. Additionally, this chapter addresses the absent IDFs illuminated in the selected texts, revealing the marginalized discourse that contribute to the lack of tenant representation and the continued marginalization of the SRO hotel tenant population. By presenting these findings, this chapter aims to provide a comprehensive understanding of the IDFs at play in the housing inspection process and to shed light on the systemic issues that prevent the realization of the human right to adequate housing in Vancouver's DTES.

This analysis made visible opaque and missing IDFs that reflect and perpetuate dominant power structures and social inequities. Two key IDFs were identified: i) constructing the tenant as a risky and unpredictable presence; and ii) superficial and devaluing of health and safety. The following sections will discuss these IDFs in detail, highlighting how language and discourse contribute to the normalization of substandard housing conditions revealing and exposing the mechanisms through which social inequities operate and are maintained. The City of Vancouver uses the term *violation* in the inspection reports and other follow up communication with the

property management company and managers of the building. Therefore, the term violation will be used throughout the findings section to discuss this discourse throughout the inspection reports. Within each IDF a collection of dominant discourses that support the overarching IDF are presented.

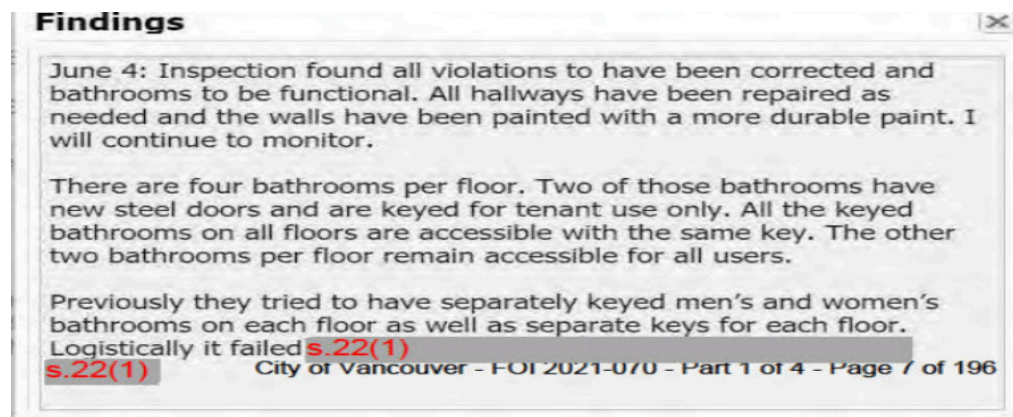
### **Constructing the Tenant as a Risky and Unpredictable Presence**

A key IDF that was identified from within the inspection report text and photo excerpts is the consistent portrayal of tenants as risky and unpredictable presences, most notably as a source of maintenance issues. The *tenant-as-risk* IDF positions tenants as problematic subjects who cause property damage and disrupt building order. The discourse around property conditions suggests that problems like broken door frames, clutter, and deteriorating facilities are due to tenants' or guests' behaviour. For example, language such as “two of the bathrooms have new steel doors and are keyed for tenant use only” and “the other two bathrooms per floor remain accessible for all users” positions tenant guests to be problematic with bathroom usage. Notably, in situating tenant guests as problematic, absent is the discursive addressing of structural disrepair or systemic neglect of these buildings, or lack of modernization of the building to support realistic dignified washroom facilities, see figure 1 for the complete bathroom citation. The redacted text illuminates challenges in understanding the full picture of the violation preventing readers from understanding the CoV and PMC reasoning for restricting bathroom access, as the reason for ‘logistical failure’ of the keyed bathrooms is removed. The omission of the redacted texts creates space for assumptions that tenants or guests were the source of violations, reinforcing the tenant-as-risk narrative while obscuring potential systemic issues such as poor facility management, outdated infrastructure, or an overall failure to modernize SROs to

meet basic living standards. The omission of texts isn't neutral – rather, it actively frames tenants as responsible.

## Figure 1

*Case File Inspector Findings from SRO Hotel 1 Regarding Bathroom Functionality*



In an additional example of how tenants are framed as the source of risk and unpredictability, clutter is cited 11 times in the SRO hotel 1 *SRA Annual Inspection Report*, with accompanying photos of tenant rooms labelled “Violation 103-Room-Floor-flithy,” which shows a photograph of a tenant’s room (see Figure 2). The violation label “filthy” lacks specificity. Is the filth tenant belongings, structural damage like black mold or fire damage, or an accumulation of debris due to inadequate building maintenance or living space? The image is of an individual tenant’s room, situating the tenant as producing clutter and filth, cited as violations of building health and safety. The photograph and text in Figure 2 offers insight into the state of many rooms labelled as filthy in the SRO hotel inspections reports across all three buildings, and there is no discursive separation between tenant belongings and building environment. The framing of filth implies tenant negligence, rather than structural decay or poor management, shifting blame away from those responsible for upkeep.

## Figure 2

*Violation Associated Photo for Filthy Floor from SRO Hotel 1*

| Photo  | Description   |
|--|---|
|  | <p>Photo 48 - Violation 103</p> <p>Room <span style="background-color: grey; color: red;">s.22(1)</span> - Floor - filthy</p> |

Language like filthy, lacking specifics, pushes the reader to question the intentional ambiguity in the reports. This individualized framing of uncleanliness and damage obscures the larger issue: SRO buildings suffer from long-term structural neglect (Evans & Strathdee, 2006; Griffiths, 2023; Knight et al., 2014; Liao et al., 2024; St. Denis, 2020). Rather than addressing these systemic deficits, such as outdated plumbing, lack of proper ventilation, or inadequate waste disposal, the reports construct tenants as the primary source of building deterioration. This IDF serves to justify increased regulation and surveillance while absolving the CoV and PMC of accountability. This framing sustains negative stereotypes by reinforcing the image of SRO tenants as challenging to house and manage and obscuring the broader systemic issues that

contribute to poor living conditions (Boyd et al., 2016; Fleming et al., 2023; Hwang et al., 2011). As outlined in Chapter 2, SRO buildings in the DTES are frequently documented to have structural issues, including black mold, rodent infestations, and persistent leaks (Liao et al., 2024; Pedersen & Jacobs, 2020). The emphasis on tenant behaviour as the primary risk distracts from addressing underlying structural inadequacies, ultimately justifying increased surveillance and regulation of tenants.

### **Surveillance**

The involvement of surveillance stakeholders in SRO inspections reflects the institutional framing of tenants as inherently risky or unpredictable as discussed in Chapter 2. By integrating law enforcement and emergency services into routine housing inspections, tenants are positioned as potential threats rather than individuals in need of secure, habitable housing. Surveillance strategies were subtly mentioned throughout the texts by the incorporation of surveillance stakeholders like VPD and Vancouver Fire and Rescue Services being involved in inspections and follow-ups (see figure 3). Figure 3 shows the attendance list for the SRO hotel 3 “CE-Inspection Report (PUI)” on March 6th and again on June 7<sup>th</sup>. Interestingly, in attendance on March 6<sup>th</sup> were staff from the hotel, the Director of Operations of the non-profit organization, the non-profit organization Maintenance Manager, a staff member from the Ministry of British Columbia, and the CoV property inspector. Then, on the follow-up inspection on June 7<sup>th</sup>, the same institutions were present, including staff members from the VPD and Vancouver Fire and Rescue Services, for this inspection. Again, no tenant representatives are present during this inspection of housing adequacy.

### Figure 3

#### *Inspection Attendees from Multiple Institutions from SRO Hotel 3 Walk Through*

In attendance on March 6<sup>th</sup>:  
 [REDACTED] - Building Manager  
 [REDACTED] - Atira Director of Operations  
 [REDACTED] - Atira Maintenance Manager  
 [REDACTED] - Ministry  
 [REDACTED] - PUI  
 VPD and VFRS absent  
 In attendance on March 8<sup>th</sup>:  
 [REDACTED]

In attendance:  
 Inspection of common areas on June 7<sup>th</sup> with [REDACTED] (building manager), [REDACTED] (assistant manager), [REDACTED] (Atira Director of Operations), and [REDACTED] (VPD).  
 Inspection of tenant rooms on June 12<sup>th</sup> with [REDACTED] (CoV Manager), [REDACTED] (building manager), [REDACTED] (assistant manager), [REDACTED] (Ministry), [REDACTED] (VFRS), and [REDACTED] (VFRS).  
 Note: See CF-2019-008472 for life safety violations (smoke alarms, self-closers, hasps).

The involvement of the VPD and Vancouver Fire and Rescue Services indicates heightened scrutiny and control over the tenants, illustrating how they are positioned as ‘risky’ and unpredictable. Moreover, the presence of law enforcement and emergency services in routine housing inspections underscores the perception of SRO tenants as problematic and, therefore requiring constant monitoring. The surveillance discourse further perpetuates the tenants as challenging to work with and subjects the tenants to be controlled rather than individuals deserving of support and adequate housing. Illustrating the operationalization of surveillance discourse within the SRO hotels were texts that noted the presence of 13 security cameras and 24-hour tenant checks (see Figure 4). Security guards were also reported to be present during SRO hotel 2’s inspection at the main entrance and the rear fire exit (see Figure 5). Again, by placing authoritative figures like security guards within inspection reports, the building and those

that tenant the building might pose a risk that requires security personnel, positioning the tenants of SRO hotels as a threat to the safety of city inspectors.

#### Figure 4

*Security Measures Noted from SRO Hotel 1 Inspection*

|   |                                     |
|---|-------------------------------------|
| Security/Video<br><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | 13                                  |
| SRA Tenant Register   | <input checked="" type="checkbox"/> |
| 24-hr Tenant Check  | <input checked="" type="checkbox"/> |

#### Figure 5

*Security Measures from SRO Hotel 2 Inspection*

**2 security guards were on site located at the main entrance and the rear fire exit.**

Security measures were pervasive through all of the SRO hotels inspection reports. Tenant reports of feelings of safety within the inspection reports do not exist. Reflecting on the context provided in Chapter two, it is possible there is rationale for some personal safety measures, outside of a bureaucratic check list.


#### Secondary Locks

All SRO hotel reports frequently mentioned indirect reference to safety and the risk of violence within the buildings. Tenants in SROs experience a range of security concerns, including theft, unauthorized room entry by staff, and physical or sexual assault (Lazarus et al.,

2011; Olson & Pauly, 2023; Pablo, 2015). Across inspection reports, there were many violations to remove secondary locks from tenants individual room doors. The presence of secondary locks suggests an urgent need for self-protection, yet the reports frame these locks solely as a fire hazard, ignoring the boarder context of safety threats (i.e., related to tenants' fear of violence and assault). The reports did not explore *why* secondary locks were necessary for those tenants, and rather positioned the use of these secondary locks as posing a risk to building integrity. Figure 6 is an example of a secondary lock in violation of the safety inspection.

### Figure 6

*Example of a Secondary Lock Violation From SRO Hotel 1 Inspection*

| Photo   | Description  |
|---|--|
|  | <p>Photo 72</p> <p>Violation 55:<br/>Room <b>2211</b> - Door - handset damaged</p> <p>Violation 56:<br/>Room <b>2211</b> - Door - hasp and second lock installed</p> |

On the one hand, this situating of secondary locks as a violation makes sense, as a secondary lock could pose a fire risk. Inspectors likely fear that a tenant would be trapped in

their room in the case of a fire emergency. However, in a broader context of SRO hotels and the DTES context, the tenant's safety needs to be met on a more tenant specific needs base over institutional check lists. It is also likely that tenants are choosing to put secondary locks on their doors out of fear for personal safety. Secondary locks might provide more personal safety from other tenants, guests, or staff. Staff may be implicated in the tenants fear of theft or improper access to the tenants suits under the pretense of other room check-ins. Routine staff entry for checks represents a significant privacy of violation, further justifying tenants' need for secondary locks (Boyd et al., 2016; Fleming et al., 2019). Routine staff entry for room checks represents a significant privacy violation, further justifying tenants' need for secondary locks. The absence of tenant consent in these inspections reflects a broader power imbalance, where tenants' autonomy is subordinated to institutional control under the guise of safety compliance.

The example in Figure 6 with the secondary lock situates the tenant as a fire safety threat. Likely, there is a risk of the tenant starting a fire and being unable to access the room with the staff master key as necessary, or the tenant might become trapped in the event of an emergency. The lack of discussion on the risks of violence faced by tenants indicates a disregard for their safety and security, focusing instead on compliance with regulations rather than the root contextual cause of these safety issues. As Olson & Pauly (2022) argue, many unhoused individuals choose encampments over substandard housing because encampments provide more control over personal security. The SRO reports frame secondary locks as violations rather than recognizing them as a symptom of systemic housing insecurity. Reflecting a failure to acknowledge the constrained choices that tenants face when their options are limited to unsafe, inadequately regulated housing or homelessness. By mandating the removal of secondary locks without addressing the safety concerns that make them necessary, these inspectors undermine

tenants' right to housing security as the United Nations and the National Housing Strategy Act define housing adequacy. Lazarus et al. (2011) present a first-hand account from a female tenant living in an SRO hotel as stating "I had problems with guys coming to my door, I had one guy try to rape me in my place, just like never ending" (p.8). This testimony presents provides context for secondary locks and concerns of the adequacy of shared facilities.

### **Writing on the Wall**

Institutional documents and photographic evidence in the SRO inspection reports do more than document building conditions, they also reinforce particular narratives about tenants themselves. Within the broader discourse that constructs SRO tenants as unpredictable or risky, the inclusion of specific images in violation reports raises questions about how tenants are being represented. Photos of tenant doors containing violent accusations or graffiti send implicit messages about the people living in SRO hotels, especially when these images are not explicitly linked to building code violations.

During my analysis of the text and photos for all of the hotels, I often found images that were included for apparent By-law violations, especially in the SRO hotel 3's report, without an apparent reference to the specific violation. There is no clear explanation for why many of the photos in SRO hotel 3's report are not associated with a violation reference. There is likely a violation related to the peephole of the doors in one grouping of photos, as each is either covered or damaged. Figure 7 shows a photograph of the exterior of tenant doors with notes from other tenants or guests to the SRO hotel throughout the report. Written on of the doors shown in the photograph depicts the phrase "WOMAN BEATER" scrolled across the door to a tenant's room. The reason for this photo to be included in the report is unclear. However, there is a clear written message that may be perceived by the inspector and any other person who has access to this type

of inspection report. Again, considering the context of the DTES and social perceptions of tenants of SRO hotels, photos included in the reports that have violent accusations likely contribute to situating the tenant as a risk to others, in this particular text, violence against women.

## Figure 7

*Examples of Writing on the Wall and Violent Accusations from SRO Hotel*



In Figure 7, another person has written “(redacted name)!!! REALLY, juvenile [sic] I’m sure.” The back and forth writing between neighbours or guests on the tenant’s door illuminates the ideological discursive formation (IDF) that there are people who may present behavioural risks when tenancing these buildings, with the inflammatory text inscribed on the doors.

Including photos that expose private communication within the building to the public through the inspection reports creates a discursive story that contributes to the IDF that tenants of SRO hotels are complex to house, challenging and risky tenants, or that tenants are dangerous. On door 108

in Figure 7, “Outlawz Always” is written in the left corner of the door. It is likely written with friendly intention, however, with the inclusion of this photo in the inspection report without an apparent reason for violation in the formatting of the FOI, there could be an association with that tenant breaking the law. Thus, an assumption is likely being made that tenants in the building have criminal histories. The selective inclusion of these images in official inspection reports, without clear justification, suggests that surveillance of tenants extends beyond building conditions to the tenants personal behaviours and social interactions. The strategic framing not only reinforces pre-existing stereotypes about SRO residents as risky and unpredictable but also further legitimizes increased regulation and oversight.

### **Fire Starting Behaviour**

The IDF of tenant behavioural correction over structural inadequacy was also evident in the discourse around fire safety. Inspection reports frequently document missing smoke alarms, broken fire doors, and exposed dry wood. Still, the responsibility for fire hazards is subtly shifted onto tenants through references to tenant behaviours, such as their removing of smoke alarms or smoking in rooms. For example, a printed paper management’s directive taped to a stairwell door instructing tenants, “NO SMOKING IN COMMON AREAS if you choose to smoke, please smoke in your suit with the door closed and window open.” (see Figure 8) suggesting prioritization of building cleanliness over tenant safety. The positioning of management as advising a practice that has a higher risk of fires and smoking related health risks for tenants is blatant. Smoking indoors has been strongly discouraged by Health Canada (2015) acknowledging there is no safe amount of second-hand smoke. They endorse that most of the smoke from a lit inhalant will enter the air and, without good airflow through the building, can linger for long periods. Second-hand smoke in small enclosed spaces can exceed the

international indoor air quality guidelines and create a significant health hazard to other tenants (Health Canada, 2015). The discourse of tenants as reckless indoor smokers positions tenants as irresponsible actors who disregard fire safety protocols, while the systemic issues that contribute to fire risks, such as inadequate building materials, lack of maintenance, and management's failure to install proper safety equipment, are marginalized in the threat of fire safety.

### Figure 8

*A Common Area Door with Smoking Signage from SRO Hotel 3*



Conflicting messages regarding fire safety and smoking expose underlying ideological tensions. While the discourse around fire safety emphasizes compliance with city regulations and

prioritizes the installation of fire alarms, the tacit acceptance of smoking within SROs, as evidenced by management's instructions, reflects broader societal negative attitudes towards smoking in public spaces. The signage, as seen in Figure 8, also lacks consideration for the physical health of tenants in general as it relates to the health risks of second-hand smoke in poorly ventilated buildings. One might perceive the signage as superficial, as the building managers wanted to pass the inspection for common areas over actual consideration of potential fire or health risks from smoking indoors. Fairclough's CDA provides valuable insights into power, ideology, and resistance dynamics within the discourse surrounding missing fire alarms and smoking regulations in SRO hotels. After analyzing the texts and photos, the analysis illuminated the power dynamics between the PMC and residents. Management's directive, per photographs of signage in Figure 8, where tenants are asked to smoke in their rooms over communal spaces, suggests a desire to maintain cleanliness or minimize disturbances in the common areas. Encouraging tenants to smoke in their rooms dismisses the likelihood of individual room violations for tampering with or dismantling fire alarms, as with smoking in rooms, it is likely a fire alarm in a 100-square-foot SRO hotel room would be sensitive to a small amount of any kind of smoke. This power imbalance underscores the asymmetrical relationship between management and tenants within SRO hotels, where the former hold significant authority over living conditions and safety protocols.

Following the signage advising tenants to smoke in their suits, Figure 9 shows data from the SRO hotel 3 inspection report, citing 46 missing smoke alarms in rooms. These missing or damaged smoke alarms might be related to tenants tampering with smoke alarms so they would not continually alarm from smoking in confined spaces. The inclusion of citations for tampering with smoke alarms reinforces the IDF of tenants as engaging in risky behaviours, positioning

them as threats to building safety rather than individuals navigating inadequate living conditions. Absent is the discourse around structural fire risks, such as the ventilation and airflow within the buildings, structural damage like considerable holes in the walls and ceilings exposing wood, and other structural fire starters. Also absent is the fact that tenants were actually advised to smoke in their rooms.

In Figure 9, there is a follow-up list of citations presented by the city inspector, which includes multiple citations for outstanding damage caused by previous fires in the building. It is a perplexing notion for building management to suggest smoking in rooms over common spaces or in the buildings at all when there is an outstanding history of fire damage to the building and the overarching structural nature of the building as kindling for starting a fire.

**Figure 9**

*A follow-up inspection report between the CoV inspector and the building manager of SRO hotel 3 indicating a violation count of upwards 94*



Figure 10 shows 94 violations levied against the PMC for SRO hotel 3 where an immediate threat to life safety is specific to fire safety. Taken together, all 94 violations increase the risk of a fire becoming catastrophic. Without auto-closing doors (which are not installed in SRO buildings), fires could spread very quickly over multiple floors. Additionally, with 46 smoke alarms missing and the previous Figures presented, a specific discursive framing is presented, one that attributes fire risks to tenant behaviour rather than structural inadequacies. Tenants are situated as removing smoke alarms although the PMC has instructed them to smoke in their rooms and smoke alarms were likely dismantled to avoid constantly setting them off. The discourse of tenant blame obscures the structural risk posed by the deteriorating conditions of SRO buildings. Figure 11, presents an example of how fire hazards are embedded in the physical state of the building itself, exposing bare, dry wood on the ceiling, which is highly flammable. Additionally, the missing smoke alarm violation documented in Figure 11 shows a large hole in the ceiling, revealing exposed wires where the alarm would otherwise be connected. By emphasizing tenant actions as the primary source of fire risk, this discourse shift accountability away from the PMC and CoV, thereby minimizing the role of structural neglect in creating hazardous living conditions.

## Figure 10

### *A Talled List of Inspection Violations that Required Immediate Correction from SRO Hotel 3*

#### Inspection found:

47 Self-closing devices on doors are missing.  
 46 Smoke alarms in rooms are missing.  
 1 Hasp is installed on exterior of door.

**Total = 94 violations requiring IMMEDIATE correction.**

## Figure 11

*An Example of a Missing Fire Alarm and Collapsing Ceiling from SRO Hotel 3*



The examples that have been presented under the IDF *constructing the tenants as a risky and unpredictable presence* above may not initially be obvious, that is the rationale for critique. As seen in the examples, tenants are consistently portrayed as a risk to the structural integrity of the building or to the inspectors themselves. This is likely not intentional, more so, naturalized in the social perception of the community of the DTES and SRO hotels in general. Critical discourse analysis (CDA) allows for the hidden or opaque IDFs to be brought to the surface in order to challenge the status quo (Fairclough, 1985). In the examples above tenants are framed as the cause of damage and disorder subtly, through the use of non-specific language like filthy, photographs of doors that are scrawled with “woman beater” or “Outlawz Always”, and signage that instructs tenants to smoke in their rooms instead of common spaces. Centering the *tenant-as-risk* to the buildings structural health allows opportunity to minimize the impact of building neglect in continuing to offer housing that does not meet the standards of habitability, set both by the United Nations and in the National Housing Strategy Act.

## Superficial and Devaluing of Health and Safety

Another key ideological discursive formation (IDF) identified in the analysis is the discursive devaluing of tenant health and safety concerns. This IDF is evident in the language used to describe infestations, structural damage, and safety violations, where health and safety risks to tenants are marginalized or entirely overlooked. Inspection discourse regarding infestations, including rats, mice, flies, and cockroaches, was primarily situated around individual tenant behaviours like hoarding or *filthy* or *cluttered* rooms. Likely, Vancouverites can expect to cohabitate with a reasonable amount of wildlife, like silverfish and mice, based on the living environment and seasonal changes. However, across all inspection reports, significant infestations are commonly reported. Across the SRO hotel reports, health and safety are discussed matter-of-factly (see Figure 12). In Figure 12, the inspector indicates, “there is a serious infestation of rats/mice with many tenants concerned about the conditions,” “there is a strong odour of rodents,” and “plumbing throughout the building remains an issue with leaks and water damage evident.” While these issues do indicate a risk of health and safety, absent is the potential health risk to the tenant living day-to-day in conditions that favour adverse health outcomes.

### Figure 12

#### *General Findings From SRO Hotel 1 that Suggest a Serious Rat Infestation*

##### General findings:

- There is a serious infestation of rats/mice with many tenants concerned about conditions due to the pest problem. There is much evidence including holes in baseboards, walls, and ceilings as well as a strong rodent odour and droppings in many places throughout the building.
- The bathrooms are generally in poor condition.
- The south (rear) elevation of the building has vegetation growing out of it around the downspout.
- Plumbing throughout the building remains an issue with leaks and water damage evident.

**Figure 13**

*An Individual Tenants Room with a Collapsed Ceiling from Water Damage in SRO Hotel 3*



As seen in Figure 13, the ceiling has collapsed, likely due to water damage. The concern for the inspector is likely that there is a hole in the ceiling from flooding and not the health consequences of continuous moist or damp environments with poor airflow and the risk of respiratory illness to the tenant. Especially considering the context of health related co-morbidities that tenants of SRO hotels are at an increased risk for with their tenancy discussed in Chapter Two, tenant health adjunct to the hole in the ceiling is missing discourse.

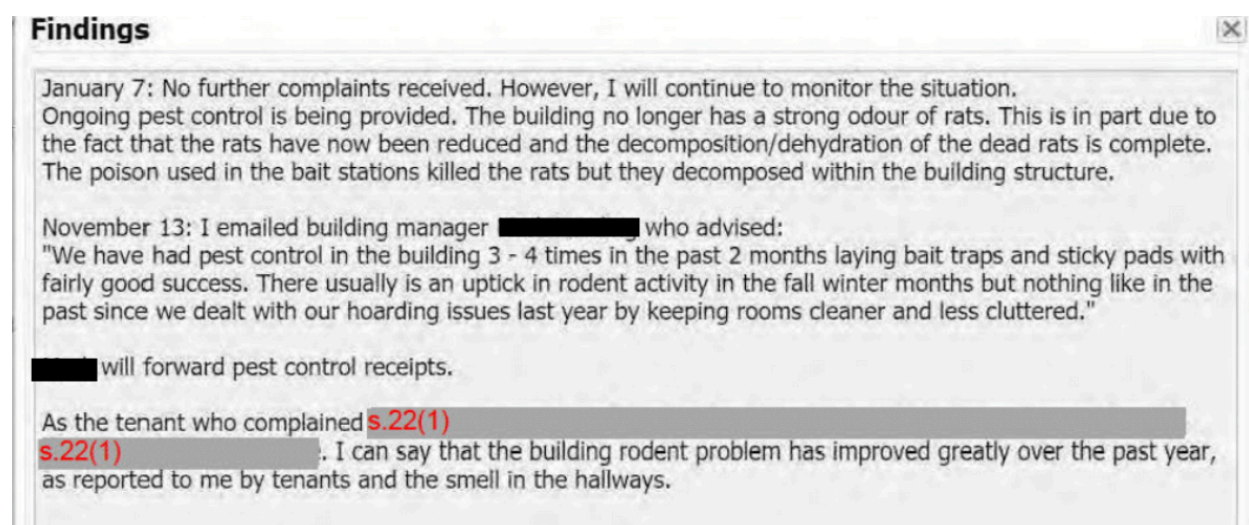
**Infestation, Extermination, and Health**

Cockroaches, flies, and rats were frequently documented across reports. For example, the SRO hotel 1 City of Vancouver inspector and the PMC building manager situate the discourse of pests around eliminating the immediate nuisances, such as removing the smell of decomposing rats, rather than addressing the underlying causes of the infestations or the long-term health implications of decomposing rats in the walls for tenants (see Figure 14). The report concludes that pest problems have been resolved “partly because the rats have now been reduced and the

decomposition/dehydration of the dead rat is complete.” The inspector indicates clearly that bait stations throughout the building have killed the rats, “but they decomposed within the building structure.” While there is good news, in that the rats are dead, the discourse on health-related risks of decomposing rats in the walls is absent.

#### Figure 14

*Findings from CoV Inspector Indicating the Rat Problem has Resolved due to the Reduced Smell of Decomposing Rats from SRO Hotel 1*



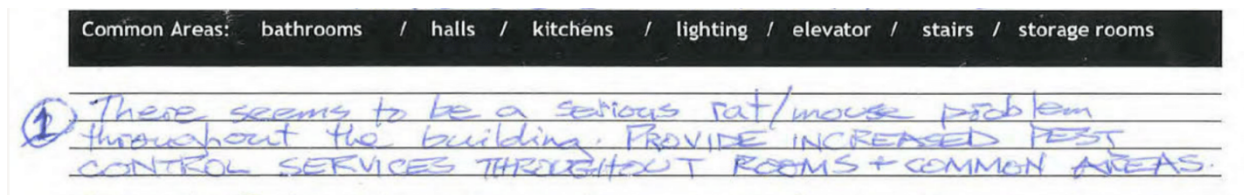
In Figure 14, the PMC building manager directly states, “there usually is an uptick in rodent activity in the fall-winter months but nothing like in the past since we dealt with our hoarding issues last year by keeping rooms cleaner and less cluttered.” The statement shows the interconnectedness of the two IDFs *constructing the tenants as a risky and unpredictable presence* and the *superficial devaluing of health and safety* by placing blame for the serious rat infestation on a hoarding tenant, while also acknowledging the presence of rats as normal for the building. The tenant, in the case of a “serious rat problem,” has been situated as the problem. While, yes, clutter and improper garbage disposal can increase the already existing rat

infestation, there are many other environmental and structural factors that can support a serious rat infestation. The inspector and building manager do not mention other environmental factors that increase the rat population, like proximity to water, urban density, housing decay, and overcrowding, which could also contribute to the increase in the rat population. Again, absent is the actual health risk to the tenant of rat-associated zoonotic infection spillover from an increased rat population and risk of human interaction.

As evident throughout the texts from the inspection report for SRO hotel 1, the articulated primary concern of the inspector and building manager is extermination. In Figures 14 and 15, the inspector and building manager are situated as the people who have the power to determine the standard of adequacy for living among infestations. Notably, there is no representation of first-hand reports from the perspective of the tenants' satisfaction regarding any infestations throughout the data sets. The inspector writes "no further complaints received," while in the same text excerpt the building manager states that "as the tenant who complained [FOI redacted data]. I can say that the building rodent problem has improved greatly over the past year, as reported to be by tenants and the smell in the hallways." The report does not provide sufficient textual evidence to adequately assess tenant health and safety. The absence of firsthand tenant accounts, environmental context, or medical concerns related to pest infestations means the report constructs the issue as 'resolved' without any substantive evaluation of long-term health implications. There is also a discrepancy in the number of tenant complaints between the inspector and building manager. The building manager specifically cites "the tenant that complained" versus "the rodent problem has improved greatly over the past year, as reported by tenants." With the redacted sentence about the individual tenant, it is challenging to understand the intersectional power relationship between the tenants and the building manager.

## Figure 15

### *Evidence of a Serious Rodent Problem in SRO Hotel 1*



As it is linearly related to time, Figure 15 was taken from the “Property Use SRA Inspection Report SR No. CF-2019-001694,” the CoV inspector completed this report on 06 Feb 2019. In Figure 14 from the SRO Hotel 1 “Case File CF-2019-014886: Closed (Standards of Maintenance By-law No. 5462” the report for rat infestation was opened because of a complaint received by the CoV described as “rats in building” in late fall of 2019 (November) and the case file was close by the CoV inspector two months later in early 2020 citing “no violation found.” The inspector states upon investigation into the rats complaint, “there seems to be a serious rat/mouse problem,” then follows with their recommendation in upper case writing: “PROVIDE INCREASED PEST CONTROL SERVICES THROUGHOUT ROOMS + COMMON AREAS.” Reflecting on Fairclough’s CDA, one would consider the power of writing something in upper case writing. The use of this style in the inspector’s recommendation suggests an urgency that is otherwise absent from the broader report. This textual emphasis constructs the rat infestation as an emergency only at the moment of inspection, reinforcing how institutional responses to deteriorating housing conditions are sporadic and reactive rather than proactive. The timeline of the rats being satisfactorily culled is interesting to note, specifically, as it relates to rat population environment. Rat populations may increase in the winter months, close to water, and within


building disrepair (Himsworth, 2014). The timeline of the rat infestation response reflects a pattern of premature case closure. The report documents severe infestations and calls for ‘increased pest control,’ yet within two months, the issue is marked as resolved. The lack of tenant input or follow-up on continued rodent activity suggests the problem was institutionally dismissed rather than meaningfully addressed. This textual framing reinforces a bureaucratic approach in which systemic issues are only acknowledged briefly before being erased from official discourse.

### **Superficial Wounds**

Safety concerns like a broken bath and shower room door frames and the absence of functioning locks are discussed in terms of compliance with by-laws rather than tenant safety. In one instance, a broken bathroom door frame, where the door was held open by a thin rope tied to an exposed pipe is discussed as such, wholly neglecting the impacts of a broken door, frame, and lock post a risk of tenant safety, particularly for women identifying tenants (see figure 16). Lazarus et al. (2011) suggest gender and associated risks for violence increases for women engaged in sex work in living environments like SRO hotels. The focus of the discourse throughout the selected text and photos remains on the aesthetic or superficial correction of these issues, rather than ensuring a safe living environment. This discourse of addressing only surface-level issues reflects a broader systemic disregard for tenant health and well-being.

## Figure 16

*An Example of a Violation for a Damaged Shared Shower Room Door Frame from SRO hotel 1*

| Photo  | Description  |
|--|--|
|  | <p>Photo 98 - Violation 14</p> <p>CA - 3rd Floor - Shower Room by Room <span style="background-color: #cccccc; padding: 0 2px;">5221</span> - Door - damaged</p> |

This CDA analysis has revealed selective implications of health within the inspection reports. While there was some acknowledgement of health issues like “LIFE SAFETY” on the *SRA Annual Inspection Report– Standards of Maintenance By-law No. 5462* that included explicitly and in all upper case writing: “SMOKE ALARM,” “SPINKLER LINE,” “DOOR CLOSER,” “HOLE IN WALL/FLOOR/CEILING (>1SQ.FT).” These were common violations throughout all three SRO hotels, while broader health concerns were conspicuously absent. This selective focus minimizes the health implications for tenants, reducing complex health issues to isolated incidents that can be superficially addressed via extermination. Figure 16, has missing discourse as it related to the safety of tenants using the washroom facilities while the doors for the shared facilities won’t close. The realities of facility adequacy for tenants at the SRO hotel

1's shared floor shower room condition are clear in the photographic evidence above. Although Figure 16 is considered a by-law violation, there is no consideration as to the health, safety, and risk of violence impact for specific populations like sex workers who, per our background knowledge, tenant these SRO hotels in the DTES. In Figure 16, a broken shower room door is shown held open with what appears to be a thin rope connected to an exposed pipe. It is a troubling thought to images oneself using shared facilities, while also understanding the context of the DTES, in that some tenants are fearful for their safety, and having to bathe or use the toilet in a dignified manner.

Safety violations are found across SRO hotel reports, where tenant behaviours are often problematized, while serious structural risks are downplayed or ignored. Referring back to Figure 16, where the door to the shared washroom facilities is being held open with a rope. Understanding the context of the DTES and SRO hotels, as well as, social perception of tenants of SROs, it is likely an image as in figure 16 may perpetuate negative assumptions of *who or how* the door frame broke. The photos included across the SRO hotel reports generate hidden assumptions and bias towards both the structural environment of SRO hotels and the people who tenant them. IDF's influence the interventions made to rectify violations. Nowhere, in the inspection reports is the voice of the tenants heard as it relates to facility adequacy.

## Chapter 5: Discussion

Vancouver's DTES has an infamous reputation locally, nationally, and globally. The discourse that has shaped the social perception of the Downtown Eastside (DTES) is controlled predominantly by institutions like the Vancouver Police Department, the City of Vancouver, local media outlets, and municipal, provincial, and federal political parties functioning under neoliberalism and capitalism (Boyd et al., 2016; Smith, 2003; Whitzman et al., 2018). Moreover, the DTES is a neighbourhood to which researchers pay a lot of attention. As such, there is robust literature, as discussed in Chapter Two, linking the DTES living conditions to a myriad of chronic health conditions and adverse health outcomes associated with severe poverty and high mortality rates among DTES community members (Boilevin et al., 2019; Hwang et al., 2011; Knight et al., 2014; Lazarus et al., 2011; Shannon et al., 2006; Smith, 2003). Yet, although the DTES is often a research-targeted community, there is a limited empirically-informed critique of how private and not-for-profit housing providers are able to maintain the decaying structural conditions of some SRO hotel housing through the investigation of municipal inspection reports and how these conditions fit within the definition of adequate housing under the National Housing Strategy Act and the United Nations definition of housing adequacy. In this discussion chapter, the three key findings will be reviewed and situated within the extant literature on adequate housing for people who face structural inequities. First, the findings of this research highlight how housing provision institutions like the City of Vancouver (CoV) and contracted Property Management Companies (PMCs) intentionally or unintentionally maintain institutional dominance and surveillance in housing provision, in regards to a specific population of DTES tenants. Secondly, these findings identify that institutionally, tenants are categorized as not having needs, especially as in relation to health and safety within their housing. The third finding to be addressed in this discussion is the lack of tenant representation in defining housing

adequacy. Following this, a review of the limitations of this study will be discussed, followed by recommendations for the realization of housing adequacy. This study has supported bridging the gap in understanding how SRO hotels have been able to maintain their status as an appropriate housing intervention for people who face structural inequity and are arguably living in the poorest postal code in Canada – despite offering fundamentally inadequate housing conditions (Boyd et al., 2016; Boyd & Kerr, 2016; Singh Kelsall et al., 2023; Smith, 2003).

### **Institutional Dominance and Surveillance in Housing Provision**

This study has identified and critiqued the hidden or opaque ideologies that are perpetuated by dominant institutions to manufacture a community under surveillance and control. Ultimately, this study demonstrates that while SRO hotels provide demonstrably inadequate housing for Canadians, institutional ideological discursive formations (IDFs) – as illuminated within housing inspection reports – perpetuate the notion of SROs as constituting adequate housing. As such, housing organizations within the DTES and the City of Vancouver (CoV) are able to maintain *institutional dominance* in discursively positioning SROs as adequate housing, despite tangible evidence to the contrary. In visualizing the tension, this study advances the literature supporting adequate housing as an upstream healthcare intervention to combat the adverse social and health outcomes of inadequate housing among people who face structural inequities (The National Academics of Sciences, Engineering, Medicine, 2018). As reflected within Chapter Two's context, multiple scholars and journalists have suggested that SRO hotels are akin to shelters, and draw on the voices of tenants to emphasize that the conditions within SRO hotels are similar to or sometimes worse than sleeping rough (Fleming et al., 2023; Heffernan et al., 2015; Singh Kelsall et al., 2023; St Denis, 2020). These prior testimonies offered by tenants are further corroborated by this study, which illustrates how institutional

stakeholders, through inspection reports, reveal the inadequacies of measures that purport to provide adequate housing but instead perpetuate the dire conditions of SRO hotels, rendering them scarcely better than sleeping outside. Within the institutional context of not-for-profit housing providers, these inspection reports serve as a legitimized measure of housing adequacy within the DTES community, in that they purport to ‘prove’ the adequacy of SRO hotels through the mechanisms of inspection, reporting, and repair. However, when critiqued, these mechanisms reveal deeper systemic issues, suggesting that such institutional practices may not merely reflect housing adequacy from an institutional position while also reinforcing the social and material conditional that sustain poverty in the DTES. By critiquing these institutional practices, this research contributes to the growing scholarship asserting that institutional discourses can influence and manufacture material conditions for certain communities and their members who require housing support. When institutional IDFs are challenged as done in this study, critique of otherwise ‘thin’ text can act as resistance against the dominating institutional complexes in society (Fairclough & Fairclough, 2012; Fairclough, 2013b; Heffernan et al., 2015). The two ideological discursive formations identified in this study – i) situating the tenants as risk and ii) the superficial and devaluing of health – scaffold the maintenance of institutions that discursively construct adequate housing and maintain a dominant perception that tenants of SRO hotels receive adequate housing.

The tenants of SRO hotels have long been described by the not-for-profit, carceral, healthcare, and government institutions as ‘challenging’ or ‘hard to house’: discourses that serve to legitimize institutional control over tenants, and situate them as ‘deserving’ of inadequate housing standards (Boyd et al., 2016; Boyd & Kerr, 2016; City of Vancouver, 2022; Evans & Strathdee, 2006; Fleming et al., 2023; Singh Kelsall et al., 2023). This study further nuances

these dominant discourses by illuminates how the discourse of describing tenants as a risk to a building's structural integrity serves to establish and maintain institutional dominance and control over SRO hotel tenants. Situating tenants as *risky*, and positioning tenant's 'challenging' behaviours as the cause of prominent structural damage, places an individual tenant as the source of risk for potential damage. Such discourses further serve to diminish the overarching structural damage that foundationally contributes to the dilapidated conditions of SRO hotel housing, including prior accounts of extensive ceiling and wall collapses from flooding and water damage due to poor and non-modernized piping (Liao et al., 2024). When tenants are situated as the risk to property damage, dominant institutions are discursively provided with both reason and justification to determine the level of housing adequacy that they are willing to offer (and believe the tenants deserve), maintaining the normalization of the poor conditions of SRO hotel housing (Fleming et al., 2023).

Much of the DTES-associated literature highlights factual evidence which frames SRO hotel housing as structurally dangerous or outright decaying, and illuminates the risks of health and social threats to tenants that stem from these housing conditions (Boyd et al., 2016; Boyd & Kerr, 2016; Collins et al., 2018; Fleming et al., 2019; Lazarus et al., 2011; Singh Kelsall et al., 2023). Within a neoliberal paradigm, an ideology in which the symptoms of predatory capitalism favour a reduction of social spending, increasing privatization, and deregulation of the social safety net, this risk is further extended to tenants within the supportive housing network. Compounded by tenants in supportive housing who are often portrayed as dangerous and prone to criminal activity due to their proximity to poverty within the DTES of Vancouver (Boyd et al., 2016; Krupa et al., 2021; Lazarus et al., 2011; Majhanovich, 2020; Slemon & Dhari, 2024; St. Denis, 2022a). This literature underscores how risk discourses persist to characterize people who

experience structural inequities, revealing the broader discourses that contribute to the particular mechanisms of surveillance that are discursively maintained to control the residents of SRO hotel housing. Findings from this study intersect with prior reports by journalist Jen St. Denis from the Tyee, which illuminate that SRO hotel housing providers will often take extensive surveillance measures within SRO buildings, such as having tenants and guests provide identification when entering the building or placing 24-hour security staff in the buildings (Boyd et al., 2016; St. Denis, 2022a). Of note, much of journalist Jen St. Denis's work is first person accounts. Moreover, Fleming et al. (2023) illuminate that community members in the DTES are under constant supervision. In particular, the City of Vancouver (CoV) supports sanctioned street sweeps to confiscate personal items (often under the guise of rooting out 'risky' items such as weapons, illegal substances, stolen goods, and responding to crime), and tenants of SRO hotels in the community are under consistent threat of the punishment of eviction (Fleming et al., 2019, 2023). Notably, these surveillance measures potentially violate Article Two of the United Nations International Covenant on Economic, Social, and Cultural Rights by potentially violating the right to housing without discrimination, which includes increased surveillance on particular communities, in this case, tenants of SRO housing compared to tenants in market housing (United Nations, 1966). By maintaining the institutional discourse that neighbourhoods with high-density SRO hotel housing are inherently dangerous and demonstrate a high incidence of crime-related activity, institutional order can be maintained in a way that overshadows the structural violence inflicted by the state against SRO hotel tenants (Boyd et al., 2016; Boyd & Kerr, 2016; Heffernan et al., 2015; Singh Kelsall et al., 2023).

### **Institutional Defining of Health and Safety**

There may be motivation for institutions to define health and safety, especially as it related to housing. Institutions like the City of Vancouver (CoV) and property management companies (PMC) defining health and safety through building inspections offers a way around providing tenant defined adequate housing standards as set by the National Housing Strategy Act (2019). The Act explicitly states that adequacy, including habitability, is defined by the tenant (NHSA, 2019). Inserting health and safety in the title of the inspection reports offers ambiguity around what exactly health or safety means. Institutions like the CoV and PMCs have stake in the game to have satisfactory health and safety reports for SRO hotels. Diving into the findings from this study illuminate the pervasive pest infestations in all three SRO hotels analyzed, illustrating both the visibility and neglect of pest control issues within the housing inspection reports. This section situates these findings within existing research on urban pest infestations, linking the systemic conditions of SRO hotels to broader public health implications.

Zoonotic diseases are contextual, much like housing adequacy (Byers et al., 2019; Himsworth, 2014). Situated within the literature discussed in Chapter Two, housing stability and housing conditions are linked to adverse mental and physical health outcomes. As such, disease presence is influenced by local environments, such as building disrepair and neighbourhood socioeconomic status (Argintaru et al., 2013; Byers et al., 2019; Evans & Strathdee, 2006; Garnham & Rolfe, 2019; Himsworth, 2014; Hwang et al., 2011; Lam et al., 2018; McVea et al., 2018; Mwoka et al., 2021). According to Himsworth (2014), in a study evaluating the population of rats in SRO hotels for zoonotic disease transmission, rat-associated zoonotic disease is increasingly linked to urbanization and urban poverty. This study further highlights that human detection of zoonotic infection is just the tip of the iceberg; if the rat population is high, the risk

of increased zoonotic pathology within the rats is likely. It is also expected that with a high population of rats, there will be a higher probability of human interaction with the rats, which increases the likelihood of pathogen spillover (Byers et al., 2019; Himsworth, 2014; Lam et al., 2018; McVea et al., 2018). Within this broader context of zoonotic infection and associated human morbidity and mortality, first-hand accounts from tenants in SRO hotels have emphasized the extent of rat infestations, with tenants reporting that they sleep with the lights on because when the lights go out, the rats come out (St. Denis, 2021). Within the findings presented in Chapter 4, the CoV inspector wrote numerous times that there was clear indication of a serious rat infestation. The inspector acknowledges the infestation by identifying rat droppings, holes, and a smell of decomposing rats in the walls, as well as, noting a previous complaint leveled by a tenant of the SRO hotel. The evidence from the findings would indicate a significant rat infestation, which in turn suggests that tenants are interacting with rats at a higher rate, inferring a higher likelihood of tenants being exposed to rat-associated illnesses (Byers et al., 2019; Himsworth, 2014; McVea et al., 2018).

Within SRO hotel housing, there are often poor sanitary and garbage disposal capacity – conditions associated with increased rat populations (Liao et al., 2024). These types of structural maintenance concerns are the responsibility of the property owner, which counters the notion that tenants could be responsible for these types of issues. The piping within SRO buildings is often outdated and leaky, offering a damp environment within the walls; indeed, many photographs within housing inspection reports show water marks and ceiling and wall cracks in tenant room and common spaces. The buildings are crowded, and sanitary systems are poorly maintained, offering an ideal rooming situation for a generally higher rat population within SRO hotels in Vancouver’s DTES (Lam et al., 2018; Liao et al., 2024). And yet, within one housing

inspection report included in this analysis, a building manager attributed pest issues to a tenant with hoarding tenancies, thereby shifting responsibility away from the systemic condition of the building itself. As such, findings from this study illustrate how official documents such as housing inspection reports discursively confer authority on housing institutions to define the conditions and impacts of health and safety issues, compounding discourses that position tenants as risky, hard to house, and deserving of poor housing conditions.

Notably, the data illustrates that rats and other pests are discursively framed as mere nuisances requiring extermination rather than as indicators of systemic issues of housing adequacy. This framing advances dominant institutional ideological discursive formations (IDFs), and thus obscures discourses of associated health and safety risks for tenants and the structural conditions that exacerbate infestations. For instance, inspection reports focus on immediate measures, such as baiting and removing decomposing rats, while failing to address the broader health risks tenants face stemming from rat infestations or the consequences of decomposing rat bodies left within the walls. In particular, absent from the texts of housing inspection reports are references to tenants' exposure to zoonotic diseases, the presence of decaying rats that tenants are expected to endure until the odor dissipates, or the underlying building disrepair that creates an ideal environment to for pests. The absence of discourses around exposure to disease obscures critical health and safety considerations for tenants, as well as, the broader structural issues that facilitate pest problems in SRO hotels. The infestation discourse suggests a normalization of inadequate living conditions, where tenants are implicitly expected to tolerate significant disruptions to their living environment. A superficial approach to pest extermination fails to engage with the interconnected health and safety risks that rat infestations pose, including the likelihood of zoonotic disease transmission and the psychological

toll of living with in such conditions (Byers et al., 2019; Himsworth, 2014; Lam et al., 2018). By placing blame on tenants, as was done by building management regarding a tenant labelled a hoarder along with the prioritization of extermination through the absolving of rat decomposition odour, over structural interventions, institutional actions perpetuate a cycle of neglect that maintains inadequate housing conditions. Using the example of a superficial health discourse regarding rodent infestations might be applied more broadly throughout all of the inspection reports. Broadly, those same superficial tendencies regarding health and safety can be seen throughout the inspection reports. Secondary locks are a violation as a safety risk in case of a fire, where any future personal safety discourse is absent, the *why* does a tenant feel they need a secondary lock is missing. Within the findings, large sections of ceilings and walls were cracked due to water damage, cited as requiring patching or drying the water damage with fans. Absent from the discourses within the analyzed texts was the health risk to the tenants living in wet and damp conditions. Rats are just one of many pests cited in the findings, and rats are not the only health risk to tenants in SRO hotels; however, rats and decomposing rats provide a vivid presentation of the nightmares tenants sleep with the lights on for (Byers et al., 2019; Himsworth, 2014; St. Denis, 2021).

### **Lack of Tenant Representation**

Within the housing inspection reports examined within this study, tenants' first-person voices were largely absent from the discourse about the structural adequacy in individual and shared spaces in SRO hotels. This lack of tenant representation ultimately served within the texts to situate institutions (such as the CoV) as defining 'what is adequate housing' and 'who has housing needs', thereby ultimately legitimizing inadequate housing provision. As explored in Chapter 2, the Canadian Human Rights Commission (n.d.) tasks all levels of government with

responsibility for actualizing the right to adequate housing. This means municipalities like the CoV are directly responsible for providing adequate housing to their community members. Ensuring the right to adequate housing requires building a system that enables everyone to live somewhere in security, peace, and dignity (Canadian Human Rights Commission, n.d.). Indeed, prior literature has encouraged the inclusion voices of those tenants with lived experience in defining housing adequacy, to fulfil obligations as set by the National Housing Strategy Act (NHSA) in the provision of the right to housing for Canadians (NHSA, 2019; Malenfant et al., 2024). Findings from Malenfant et al. (2024) study demonstrate that without the inclusion of tenants in the evaluation of housing adequacy, this construct is narrowly defined by housing providers and municipal authorities, perpetuating a framework that excludes the lived experiences of tenants and reinforces structural inequalities. If housing adequacy is only defined by the provisioner institutions, adequacy defined by tenants will continue to be left out of housing discourse. When tenant voices are left out, housing adequacy cannot be met under the NHSA or as defined by the United Nations human right to housing as the institutions define both *who* is in housing need and *what* type of housing they are worthy of (Canadian Human Rights Commission, n.d.; NHSA, 2019; United Nations, 1966).

The findings of this study emphasize the systemic neglect embedded in the inspection process, and highlight the absence of tenant voices in redressing this systemic neglect. For example, photos included in section reports show violations such as broken doors or pest-related damage, but fail to include tenants' perspectives on how these issues impact their daily lives and produce conditions of inadequate housing. Surveillance practices further underscore the exclusion of tenant voices in defining housing policy, with the involvement of law enforcement and fire services in inspections reinforcing a framework of control over tenants rather than

engaging them as stakeholders in defining housing adequacy (Boyd et al., 2016; Heffernan et al., 2015). These examples highlight how institutional actors discursively prioritize compliance and control, marginalizing tenant experiences and perpetuating a discourse that excludes them from meaningful participation in shaping their living conditions as legislation supports tenants to do (Canadian Human Rights Commission, n.d.; NHSA, 2019).

### **Recommendations for the Realization of Housing Adequacy**

The findings from this study, alongside the extant literature on how housing can have a causal relation to adverse outcomes on mental and physical health, calls for all levels of Canadian government to address housing adequacy in order to honour the promises made as a signatory to the United Nations Covenant on Economic, Social, and Cultural Rights (Boyd et al., 2016; Hwang et al., 2011; Lazarus et al., 2011; Mwoka et al., 2021; United Nations, 1966). Honouring Canada's adoption of the National Housing Strategy Act includes holding housing provisioner institutions accountable to those promises. The findings from the inspection reports of the three SRO hotels illustrate that additional accountability mechanisms for ensuring housing adequacy are needed, and that this process of realizing accountability in housing adequacy must be a multifaceted approach (Argintaru et al., 2013; FHA, 2023; NHSA, 2019; Mwoka et al., 2021; Public Services and Procurement Canada, 2024; Shannon et al., 2006; United Nations, 1966). In this section, I offer recommendations for realizing housing adequacy, extending from study findings and the existing literature. Prior research suggests that establishing tools such as a Housing Commissioner or Ombudsperson strengthen the enforcement of housing rights by enforcing accountability measures that local governments must meet for their populations (Brougham, 2023; Wood, 2023). The provision of adequate housing has been a progressive failure over decades. It will likely take further decades to course correct housing adequacy in

Canada. Three recommendations for supporting the realization of housing adequacy to be actualized in Canada include i) Increasing the access to the Federal Housing Advocate; ii) Increasing tenant representation in building and delivering supportive housing; and iii) Increasing the number of supportive housing unit availability.

### **Increasing Access to the Federal Housing Advocate**

The Federal Housing Advocate (FHA) is a nonpartisan watchdog created to support meaningful action in addressing housing adequacy standards across Canada (Canadian Human Rights Commission, 2023a), as an intervention for holding governments accountable to their obligations under the National Housing Strategy Act (NHSA) (Canadian Human Rights Commission, 2023a; NHSA, 2019). The FHA is a tool to ensure the human right to housing as defined in the NHSA and by the United Nations (NHSA, 2019; United Nations, 1966). For the FHA to optimally function and meet their goals, it requires public submissions documenting claims of housing inadequacy and where community adequate housing needs are unmet, such as in Vancouver's DTES community (FHA, 2023). However, from my experience on multiple outreach-based healthcare teams in Vancouver's DTES, using the FHA as a housing adequacy intervention is not even a whisper.

The FHA holds seminars with front-line service providers, has collaborated with 30 communities across Canada in the creation of the tool, and advocates for people with lived experience with housing inadequacy to use an online tool, email, or call a toll free number to discuss and/or report these issues (FHA, 2023). Since the FHA website launched in May of 2022, only 220 public submissions had been made, and of those submissions, only 20% came from British Columbia (FHA, 2023) – demonstrating that there is a likely need for increased awareness and utilization of the tool. Drawing on the demographics from the three SRO hotels

investigated, there are approximately 320 units, and as such, the number of tenants from the three SRO hotels outnumbers the total amount of provincial submissions to the FHA since 2022. The FHA acknowledges that access to technology is a barrier to accessing the FHA and having tenant voices amplified (FHA, 2023). Reflecting on the findings, graphic pictures of decay within individual units and common spaces in the three SRO hotels shows evidence of chronic infestations, cracked ceilings and walls due to water damage throughout, among many other evidences of building decay that would not meet the definition of housing adequacy within the NHSA and the United Nations definition of housing as a human right (NHSA, 2019; United Nations, 1966). Access to the FHA can be better utilized to strengthen and empower the community of the DTES and other communities that experience housing inadequacy across Canada.

There are roughly 6,547 SRO units in 146 open SRO buildings, with 48% being privately owned, 50% non-market owned (i.e., government and non-profit owned, including the three SRO hotels examined in the findings), and 2% owned by Chinese Benevolent Society (DTES SRO Collaborative, 2024). As an outreach nurse, I have been in a majority of the DTES SRO buildings, the decay within the three critiqued in the findings is not unique them. With numbers in the thousands of tenants in SRO buildings in Vancouver and the conditions depicted throughout the findings, tenants and tenant advocates could overwhelm the FHA with complaints. If access to the FHA was prioritized as an intervention used by front-line workers and tenants of the DTES or other communities facing structural barriers to achieving housing adequacy, it is likely that the number of complaints to the FHA would dramatically increase. Such increase in claims to the FHA would surely warrant a response to SRO housing not only in Vancouver's DTES but across Canada. Increased access to the FHA could be achieved by regular

seminars to outreach healthcare service teams or primary care centres in the community. Presentations could be made a regular occurrence by the FHA or advocacy teams like the DTES SRO Collaborative, a non-profit organization focused on improving the conditions of housing for tenants who are at risk of homelessness. The FHA or other advocacy groups like the DTES SRO collaborative might set up presentations, information sharing sessions, or claim filing pop-up events in places where the tenants of the community gather, like Carnegie Community Centre, the Evelyne Saller Centre, the Gathering Place, or the Oppenheimer Park Fieldhouse (City of Vancouver, 2025a, 2025b, 2025c, 2025d).

Similar in-service based education would also be valuable advocacy tools for acute care social workers and nursing school students to encourage housing adequacy and social justice advocacy, which is already a pillar of nursing (Canadian Nurses Association, 2017). The Canadian Nurses Association (2017) defines social justice as “the fair distribution of society’s benefits, responsibilities and their consequences” (p.26), including assessment of the root causes of disparities and encouraging advocacy to eliminate those disparities (Abu & Moorley, 2023; Canadian Nurses Association, 2017). Making nursing students aware of tools such as the FHA will offer advocacy tools to nurses early in their nursing journeys in promoting social justice as it relates to human rights and the social determinants of health.

### **Tenant Representation in Adequate Housing Provision**

Housing adequacy cannot not met on the basis of landlords’ perception of adequacy following the National Housing Strategy Act (NHSA). Housing adequacy is defined by tenants per the NHSA, however, if tenants aren’t aware of their rights and have only experienced inadequate housing measures, tenants may accept the deplorable housing conditions they have been offered (Fleming et al., 2023; NHSA, 2019). Meaningful participation from tenants in the

shaping policies that affect them, encouraging relationships with people with lived experience in SRO hotels, including through tangible actions such as developing committees for housing adequacy that incorporate tenants' voices might support a sense of purpose in actualizing adequacy housing provision for communities (Browning, 2023; Malenfant et al., 2024; Schwan & Perucca, 2022; SRO Collaborative, 2019). As an example of a possible solution for ensuring tenant representation in defining housing adequacy would be to have an elected board of tenant representatives from each SRO hotel that would be included in the inspections along with all of the other institutional representatives that the data from this study shows are typically present, such as the Vancouver Police Department and Vancouver Fire and Rescue Services. Having people with lived experience included during inspections as a representative of the tenants in that building, to shed light on the seriousness of the building concerns, might offer new insight into the real life consequences of living in rat infested buildings or living in rooms tenants feel they have to add their own secondary lock, or what their experience is like living in constant fear their ceiling will collapse on them because they can see the damp spot on the ceiling growing (Browning, 2023; Malenfant et al., 2024).

Offering a deeper understanding of the complexity in navigating SRO hotel housing adequacy might truly never be understood or actualized without the inclusion of tenant voices in housing adequacy evaluation. The inclusion of tenant voices can illuminate the experience of discrimination against tenants and their infringement of their freedoms under the Canadian Charter of Rights and Freedoms (Government of Canada, 2024). Hearing directly from tenants and tenant inclusion at all levels of government and among the housing providers offers community driven social change and embodies the notion of *nothing about us, without us*, encouraging tenants of SRO hotels to be leaders in housing adequacy procurement (Malenfant et

al., 2024). There are gaps in securing the right to adequate housing in Canada. The often-disenfranchised position of tenants and the intersectional nature of housing policy and tenant experiences allows for tenants to be continually neglected in the decision making regarding policies about housing community members of the DTES (Browning, 2023; Malenfant et al., 2024; SRO Collaborative, 2019). Tenant inclusion during building inspections would provide the missing representation of tenant voices in the matter of their buildings housing adequacy. In the inspection reports, other institutions like the Vancouver Police Department and Vancouver Fire and Rescue services were often involved in decisions for safety and intervention. Without hearing from tenants at any point during these inspections, adequacy satisfaction is evaluated only by institutional players, which does not fulfill the goals of the National Housing Strategy Act, which suggests tenants are to define their housing adequacy (Legislative Services Branch, 2019b).

### **Local Participation in Supportive Housing Stock**

Municipal governments bear some of the responsibility to regulate the private and not-for-profit sectors, including addressing the financialization and commodification of housing by embedding the right to housing in urban planning, preserving affordable housing stock, and regulating short-term rentals (CERA & NRHN, 2022). All levels of government have a responsibility to meet global standards of adequacy set by the United Nations and the NHSA, which outline the means to consider housing adequate, which includes access to essential services such as safe drinking water, energy for cooking, health, lighting, sanitation, waste disposal, and that housing to meet the standards of habitability must include protection from elements, as in, cold, damp, and other health threats like infections from infestations (NHSA, 2019; Office of the High Commissioner of Human Rights, n.d.). Provincial and Federal

governments working together might utilize similar adequacy-based housing standards by increasing the provincial investment in housing and setting up broad mechanisms to support local governments in accelerating the replacement of SRO hotels with self-contained dignified social housing units through funding opportunities (SRO Collaborative, 2019).

Housing is good health policy (Carter & Polevychok, 2004). This has been exemplified in the actions undertaken within a small city named Medicine Hat, in Alberta, which was the first Canadian city to functionally end homelessness (Gregersen, 2022). In Medicine Hat, their local government and housing providers used a data driven approach, placing housing above all other forms of treatment, as in, mental health and addictions treatments (Gregersen, 2022). Attributes or characteristics of housing have influence on people's lives and can be instrumental in the health and well-being of individuals and communities (Argintaru et al., 2013; Carter & Polevychok, 2004; Garnham & Rolfe, 2019; Mwoka et al., 2021). The state of neighbourhoods and housing is impactful in how people feel about their housing (Carter & Polevychok, 2004). If there is a lack of pride in community, senses of helplessness and hopelessness can consume tenants within neighbourhoods like the DTES, leaving tenants disempowered (Carter & Polevychok, 2004).

Housing policy in the 1970's was robust, aiming to house the population (Smith, 2024; Whitzman & Flynn, 2023). The decline of supportive and co-op housing stock began to plummet in the early 1990s when the financialization of housing began its reign over the housing stock across Canada (August, 2022; Higashihara, 2021; Whitzman & Flynn, 2023). Though there is a role for the federal and provincial governments, due to the proximity of municipalities to people who experience housing need, there is a responsibility for municipal governments to enforce building standards are meeting housing adequacy as per the definition of adequate housing under

NHSA and the United Nations (NHSA, 2019; Schwan & Perucca, 2022; United Nations, 1966). Violations of the right to adequate housing often result from local government failures to take productive measures in addressing unacceptable housing conditions, like those reviewed in the findings (Schwan & Perucca, 2022). Advocating to local government to increase spending to meet the housing needs of the communities within the city would fit within the goals of the NHSA (NHSA, 2019; Smith, 2024). Goals of local governments should include rapidly building more supportive housing units to meet the thousands of people living in housing need in the province of British Columbia (Smith, 2024). Within increasing the supportive housing stock, there is room for integrated community economic development (Smith, 2024). Community development might include, utilizing local labour, addressing local need, creating local ownership, hiring with emphasis in skills development for the local population (Carter & Polevychok, 2004). Canada having one of the smallest social housing portfolios of the developed nations is unacceptable and urgency to re-engage in supplying housing for all should be a top priority of all levels of government in Canada (Carter & Polevychok, 2004; C. Whitzman et al., 2018; Whitzman & Flynn, 2023).

### **Limitations**

Although critical discourse analysis was an excellent tool for uncovering hidden IDFs within an otherwise thin data set, this study had some limiting factors. Given the time constraints of a master's level thesis, further study to include first-hand tenant experiences from these same SRO hotels would benefit the literature on housing adequacy in Canada. Including tenants' experiences with housing adequacy inspections would support a more human rights-based approach to adequate housing provision, especially in communities where housing rights advocacy may be more challenging due to other factors like mental health, substance use, and

routine involvement in the carceral system. Future studies might include an institutional first-hand perspective on communication challenges with not-for-profit property management companies (PMC), private SRO hotel owners, and BC Housing. Including an institutional understanding of the deliverance of adequate housing would provide a broader understanding of contract awarding and the institutional goals of winning housing contracts with municipalities. Another limitation of this study is the focus on one PMC, while there are multiple PMCs and private operators of SRO hotel housing in Vancouver's DTES. As discussed in the context of Chapter Two, the City of Vancouver has a long history of challenges in enforcing adequate building standards with not-for-profits and private SRO hotel housing providers (St. Denis, 2020; St. Denis, 2021; St. Denis, 2022a, St. Denis, 2023). This research focused on a property management branch within a single not-for-profit organization that provides housing throughout Vancouver. However, this study focused on only three of their many contracted buildings. There is opportunity to assess the provision of adequate housing by private and other opportunistic not-for-profit housing institutions within the nationally recognized human right to housing to more wholly critique the actualization of housing adequacy from all levels of housing provision in the province and even nationally and how private operators and institutions are situating housing within the National Housing Strategy Act (Biss et al., 2022; CMHC, 2022; NHSA 2019; Segal, 2019) As a final limitation, within the dataset several photographs and text excerpts had been redacted by the City of Vancouver freedom of information release process. The extend of redacted data in some ways limited the extent of critical discourse analysis that could be conducted on this dataset; however, the presence of such redacted data offered its own discursive assumptions based on what was absent or removed. For example, redacted data included details

regarding tenants' complaints regarding housing conditions – which further compound the discursive erasure of tenants' voices from the discussion and defining of housing adequacy.

### **Conclusion**

The power dynamics within the inspection report texts can be understood through the roles and responsibilities of the institutions in maintaining housing adequacy. The city inspector themselves holds authoritative power, evidenced by their ability to assess conditions and mandate changes. Property management is also positioned as a party with power over the tenants, as the tenants are excluded throughout this process of ensuring health and safety within the structure of SRO hotels. In the inspection reports, the property management company is positioned as the responsive party, required to act on the directives issued by the inspector.

Although Vancouver's DTES is unique, inadequate housing conditions in low socioeconomic communities within the context of high-income countries can be found globally. An example of the global situating of inadequate housing is the deadly Grenfell fire in London, England, in 2017, which killed 72 people (Foster, 2017; Shamim, 2024). The Grenfell fire was catastrophic and preventable. A small kitchen fire broke out on the fourth floor of a high-rise residential building and rapidly spread throughout the building, becoming England's worst residential fire since World War II (Shamim, 2024). The surviving victims of the Grenfell fire say that their concerns about the structural integrity of the building and materials used, like cladding on external walls, went ignored for decades (Foster, 2017; Lawless, 2018; Shamim, 2024). The concerns from the survivors of the Grenfell Tower fire are reminiscent of the complaints from the tenants of the Balmoral and Regent SRO hotels on Hastings Street in Vancouver's DTES (St Denis, 2020). Tenants in those SRO hotels for years worried that their ceilings would collapse on them or that they would be trapped and burn to death as their concerns continued to be ignored

for months to years (Griffiths, 2023; St Denis, 2020; St. Denis, 2022b). Without tenant representation in defining housing adequacy, local governments, private, and not-for-profit housing providers can manufacture how housing adequacy is situated and maintained to maintain structural power and dominance over a community already burdened with structural inequities.

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## Appendix

### Ethics Waiver

Dear Maddie Beaumont, Allie Slemon and Bernie Pauly,

The Vice-chair of the Research Ethics Board, Dr. Matthew Murphy and I reviewed the information received via email starting January 2, 2024 (attached and below). We concluded that, the student's research activity as described, is **exempt** from a UVic Human Research Ethics. Policies governing research include the national research ethics policy (TCPS2) and the University of Victoria human research ethics policy and guidelines.

- Board of Governors research policy ([RH8100](#))
- Board of Governors regulations for research involving humans ([RH8105](#))
- Tri-Council Policy Statement on the Ethical Conduct for Research Involving Humans - [TCPS2 \(2022\)](#)

Reason(s) for the exemption:

- In this case, the materials were originally obtained by a journalist via a Freedom of Information Request for the journalist's work. The student received permission (below) from the journalist that they were permitted to use the FOI'd material.
- Student noted "It appears some of the documents have already been made public, while others were not released in that way at this time (they could be in the future as the one document based on the Flint Hotel (July 2021) is, but I will not be notified of this)."

Student confirmed that, "Names of bylaw officers from the department are visible in the data set but would not be used for my project."

### Instructions

In the event the nature of the project changes, UVic human research ethics review may be required. Please contact us if you have questions.

Please retain this email for your records. We will do the same.

Sincerely,  
Eugenie

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