



Integrating Gender Equity into Canada's Housing Supply and Affordability Frameworks through Build Canada Homes

A brief for the Standing Committee on Human Resources, Skills and Social Development and the Status of Persons with Disabilities

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List of Recommendations

- **Recommendation #1:** Develop and embed an enhanced Gender-Based Analysis (GBA+) Framework into Build Canada Homes, specifically rooted in Indigenous knowledge, and co-developed with individuals who have lived experience of homelessness and housing insecurity.
- **Recommendation #2:** Align Build Canada Homes with a revitalized National Housing Strategy that affirms the human right to housing and uphold the government's commitment to ending homelessness, as required under s.5 of the *National Housing Strategy Act*.
- **Recommendation #3:** Build housing and retrofit existing structures to meet affordability needs and structural adequacy standards, especially for women and gender-diverse people experiencing housing loss and displacement due to climate change-related natural disasters (e.g. wildfires, melting permafrost) and other environmental barriers impacting their health (e.g. mould, long-term boil water advisories).
- **Recommendation #4:** Allocate 40% of affordable and deeply-affordable units for women and gender-diverse people through federal investments such as Build Canada Homes and the Canadian Mortgage and Housing Corporation (CMHC).

Introduction

Build Canada Homes (BCH) acknowledges that Canada's housing crisis cannot be addressed through a "business-as-usual" approach and will "consider investments to the extent that they support its core mandate of directly increasing the amount of affordable housing."¹ However, a lack of concrete targets and development timelines, vague affordability parameters, and the absence of targeted allocations for those in core-housing-need risks foreclosing any meaningful departure from it. Although recent investments into the Affordable Housing Fund are welcome, they have a narrow focus on expanding housing supply without adequately understanding or addressing the scale and nature of housing need.

Recognized as a priority population by the *National Housing Strategy (NHS) 1.0*, women and gender-diverse people face distinct housing barriers that are often shaped and compounded by intersecting factors such as income inequality, race/ethnicity, disability, experiences of violence/trauma, caregiving responsibilities and costs, as well as living in overcrowded or structurally inadequate housing.² Affordability frameworks that fail to account for household composition often assume dual-income purchasing power and caregiving capacity, resulting in housing models that price single-income parents out of family-sized units despite requiring larger housing to avoid overcrowding. In turn, these conditions increase the risk of housing instability and child welfare involvement when safe, appropriately sized, and affordable housing is not accessible.

Housing instability is often misinterpreted as neglect by child welfare systems, a dynamic shaped in part by systemic gender inequities. This can result in the disruption of income supports and housing benefits, increasing the risk of homelessness.³ In the absence of adequate housing options, survivors also face constrained choices, including returning to unsafe or abusive environments, couch surfing, living in informal living arrangements to retain custody of children, or engaging in survival sex for shelter. These forms of precarity often remain invisible in official homelessness counts and in policies that shape how housing affordability is defined and measured.⁴

This gap is especially pronounced for Indigenous women, single mothers, newcomers, and survivors of violence, who are more likely to require deeply affordable, appropriately sized, and stable housing options,⁵ and who face additional barriers to accessing adequate housing (e.g. mould, water quality,

¹ Government of Canada. (2026). *Build Canada Homes*. <https://housing-infrastructure.canada.ca/bch-mc/index-eng.html>

² Whitzman, C. (2026). *Rights-based intergovernmental agreements for the next National Housing Strategy*. Canadian Human Rights Commission. <https://homelesshub.ca/wp-content/uploads/2026/03/Rights-Based-Intergovernmental-Agreements-NHS.pdf>

³ Schwan, K., Versteegh, A., Perri, M., Caplan, R., Baig, K., Dej, E., Jenkinson, J., Brais, H., Eiboff, F., & Pahlevan Chaleshtari, T. (2020). *The State of Women's Housing Need & Homelessness in Canada: A Literature Review*. Hache, A., Nelson, A., Kratochvil, E., & Malenfant, J. (Eds). Toronto, ON: Canadian Observatory on Homelessness Press.

⁴ Schwan, K. et al. (2020).

⁵ Schwan, K. et al. (2020).

pests).⁶ In this context, increasing the number of affordable units alone is insufficient if affordability benchmarks do not account for their specific needs.

In response, WNHHN offers a gender-based perspective to HUMA in its study of Bill C-20 (*An Act respecting the establishment of Build Canada Homes*) and urges the Committee to support amendments that reflect the recommendations outlined in this brief, ensuring that the housing realities of women, women-led families, girls, and gender-diverse people are meaningfully embedded in BCHs' design, affordability frameworks, development targets, and outcomes.

Recommendation #1: Develop and embed an enhanced Gender-Based Analysis (GBA+) Framework into BCH, specifically rooted in Indigenous knowledge, and co-developed with individuals who have lived experience of homelessness and housing insecurity.

Embedding an enhanced GBA+ framework into BCH is critical to ensuring that housing investments are equitably designed, gender-responsive, culturally appropriate, and evaluated in relation to diverse housing needs. While current investments demonstrate great promise and commitment to alleviating Canada's housing crisis, BCHs' success will depend on clear accountability mechanisms that keep policymakers responsive to the evolving housing needs of women, gender-diverse people, and Indigenous communities.

Relationship breakdown is one of the leading causes of housing loss for many women and gender-diverse people. For example, recent data from the *Unaddressed Project (2026)* in Calgary found that one quarter of all women who experienced housing insecurity attributed relationship breakdown as a precipitating factor for their housing loss.⁷ Traditional housing and caregiving dynamics often leave women without lease history or independent income, making it harder to secure housing after separation and increasing the risk of returning to unsafe or abusive situations.⁸ Challenges in accessing housing can also escalate into child welfare involvement when lone parents cannot afford adequately sized housing or must spend a disproportionate share of their income on rent, creating a structural bind in which housing stability or basic needs are compromised, increasing vulnerability to homelessness.

National data on core-housing-need show that 19.4% of all households in core-housing-need are lone-parent-led families, with women-led households approximately 35% more likely to be in core-housing-need than those led by men.⁹ In jurisdictions with a high proportion of Indigenous residents, such as the Northwest Territories (NWT), Indigenous households are 1.3 times more likely to be in core housing

⁶ Schwan, K. et al. (2020).

⁷ ³¹ Baig, K., Samimi, M, P., Sherwani, A., Seccia, S., Eiboff, F. (2026). *Unaddressed: The State and Scale of Housing Insecurity and Homelessness Experienced by Women and Gender-Diverse People in Calgary*. [Publication Date: April 2nd, 2026] <https://www.unaddressed.ca/>

⁸ Baig, K. et al. (2026).

⁹ Canada Mortgage and Housing Corporation. (2025). *Core housing need and gender*. <https://www.cmhc-schl.gc.ca/observer/2025/core-housing-need-gender>

need or to live in overcrowded dwellings than non-Indigenous households.¹⁰ Single parents in the NWT also require, on average, approximately \$20,000 more per year to reach the poverty threshold.¹¹

- **Co-develop** program design, project selection, implementation and evaluation processes for affordable housing initiatives through consultation with individuals with lived experience of housing insecurity, single parents, Indigenous Elders, and survivors of violence to better understand housing development priorities and funding allocation.
- Ensure **OCAP® (Ownership, Control, Access, and Possession)**¹² principles are embedded, and that projects are led in partnership with Indigenous housing providers and knowledge holders.
- Uphold the right to housing for Indigenous peoples and ensuring that housing access, affordability, and adequacy are not determinants of child welfare involvement, while supporting commitments to keep Indigenous families together.¹³

Recommendation #2: Revitalize the NHS in recognizing the human right to housing and, in doing so, uphold the government’s commitment to ending homelessness, as required under s.5 of the *National Housing Strategy Act*.

Although the NHS commits to a “right to housing,” programs under its scope have not aligned with these principles, and federal housing investments have fallen significantly short of their targets. Through the Apartment Loan Construction Program, the NHS provided \$55 billion in low-cost loans; however, the National Housing Council recently found that these were awarded mostly to market-housing developers, with only 3% of units affordable to those in core-housing-need.¹⁴ Current definitions of “affordability” are too broad and insufficiently targeted to those in core-housing-need, allowing programs to meet affordability criteria on paper while remaining inaccessible in practice to the lowest-income households.

Ensuring affordability through BCH requires establishing clear, consistent definitions of affordability and deep affordability as outlined by the Canadian Human Rights Commission,¹⁵ along with concrete targets and timelines for affordable housing development.

¹⁰ CMHC. (2026). *Core housing need data - by the numbers*. <https://www.cmhc-schl.gc.ca/professionals/housing-markets-data-and-research/housing-research/core-housing-need/core-housing-need-data-by-the-numbers>

¹¹ Sarangi, L., Clark, A., Doucet, M., Friendly, M., Li, T., Meisner, A., Rothman, L., Safi, D. (2025). *Investing in tomorrow: A future without poverty*. Campaign 2000. <https://campaign2000.ca/wp-content/uploads/2026/02/2025-Report-Card-on-Child-and-Family-Poverty.pdf>

¹² First Nations Information Governance Centre. (2014). *Ownership, Control, Access and Possession (OCAP®): The path to First Nations information governance*. <https://fnigc.ca/ocap-training/>

¹³ National Housing Council. (2025). *Final Report and Recommendations of the Neha Review Panel*. [https://nhc-cn.ca/media/Neha/Reports/final-report-and-recommendations-ENGLISH%20\(web\).pdf](https://nhc-cn.ca/media/Neha/Reports/final-report-and-recommendations-ENGLISH%20(web).pdf)

¹⁴ Whitzman, C. (2026).

¹⁵ Whitzman, C. (2026).

- **Define and enforce housing affordability** under BCH initiatives as housing costs **not exceeding 30%** of a before-tax household income, with the commitment that housing costs do not compromise the ability to meeting other basic needs, such as food.
- **Define and enforce "deep affordability"** based on income (e.g., rents geared to income or below 30% of household income), ensuring accessibility for households in core housing need rather than relying on market-based benchmarks.
- **Measure the number of people experiencing homelessness annually**, along with their needs, using the Homeless Individuals and Families Information System (HIFIS), including the proportion who self-identify as Indigenous to assess cultural adequacy.
- Track the number of households in **core-housing-need**, as well as rates of **self-reported evictions** and **evicted renter households** across BCH developments over a five-year period.
- **Monitor** net changes in the supply and **affordability of market and non-market housing** over a five-year period.

Recommendation #3: Build housing and retrofit existing structures to meet affordability needs and structural adequacy standards for women and gender diverse people experiencing housing loss due to natural disasters and environmental barriers impacting their health.

BCH must commit to the security of tenure for all Canadians, including protection from displacement from natural disasters and other environmental conditions that contribute to severe and chronic health outcomes (e.g. mould-related respiratory issues). Climate-related events in Canada, such as wildfires in British Columbia, flooding across Quebec, and permafrost thaw in Northern communities driven by global warming all directly contribute to severe structural damage and displacement. For women and gender-diverse people, housing insecurity is also shaped by a bi-directional relationship between climate change and existing structural conditions, which exacerbates vulnerability to harm.

Although these events may appear gender-neutral, women and gender-diverse people – particularly those with low or single incomes – face greater barriers to relocation. In the absence of safe, affordable, and appropriate housing options, displacement often leads to constrained choices, particularly in the context of caregiving responsibilities, including entering unstable or informal living arrangements. In this way, climate-driven housing loss heightens exposure to violence and precarity, reinforces hidden homelessness, and deepens existing inequalities.

Additionally, in 2010, when the UN General Assembly recognized safe and clean drinking water and sanitation as a human right, Canada abstained from the vote.¹⁶ While Canada has made efforts to

¹⁶ Amnesty International. (2010). *Recognition of the human rights to water and sanitation by UN Member States at the international level*. <https://www.amnesty.org/ar/wp-content/uploads/2021/05/IOR4013802015ENGLISH.pdf>

improve access, as of April 2026, 40 long-term drinking water advisories remain in 37 communities, primarily on First Nations reserves, where rates of water-borne diseases are 26 times higher than the national average and residents are 90 times more likely to lack running water.¹⁷ Children living on-reserve are also 3.6 times more likely to be investigated and 17.2 times more likely to be placed in care than non-Indigenous children.¹⁸ In this context, structural infrastructure deficits that directly contribute to conditions of deprivation are often addressed through child welfare intervention, shifting the consequences of infrastructure failures onto Indigenous families.

In response, BCH must:

- **Fulfill the right to an adequate standard of living** for women and gender-diverse people by ensuring new developments are not built in high-flood or wildfire-risk zones, or are designed to withstand climate-related impacts such as permafrost thaw.
- **Retrofit existing structures** in high-risk areas, including elevating structures (e.g., on stilts or piles), installing backflow valves to mitigate flood risk, and incorporating fire-resistant roofing, insulation, air filtration systems, etc.
- **Ensure access to safe drinking water and sanitation as core components of housing adequacy standard**, including by prioritizing the elimination of all long-term drinking water advisories through coordinated investments in water treatment, long-term water-quality maintenance, and plumbing retrofits, particularly in First Nations communities.

Recommendation #4: Allocating 40% of affordable and deeply-affordable builds for women and gender-diverse people.

WNHHN's recommended allocation of 40% of affordable and deeply affordable housing developed through BCH is informed by multiple factors. Current core-housing-need data does not adequately capture the true scale of homelessness and housing insecurity experienced by women and gender-diverse people. It excludes key populations, including post-secondary students (2.3 million),¹⁹ newcomers and work-permit holders, individuals living in shelters or transitional housing, those experiencing homelessness, or those institutionalized due to lack of stable, accessible housing options.

¹⁷ Indigenous Services Canada. (2018, September 28). *Ending long-term drinking water advisories*. Government of Canada. <https://www.sac-isc.gc.ca/eng/1506514143353/1533317130660>

Black, K., Swampy, M. (2021, May 7). "Tip of the iceberg: The true state of drinking water advisories in First Nations." *University of Calgary*. <https://ucalgary.ca/news/tip-iceberg-true-state-drinking-water-advisories-first-nations>

¹⁸ Kenny, K. S., Wall-Wieler, E., Frank, K., Courchene, L., Burton, M., Champagne, M., Bennett, M., Rocke, C., Brownell, M., & Urquia, M. L. (2025). Inequities in child protective services contact among First Nations and non-First Nations parents in one Canadian province: a retrospective population-based study. *BMC public health*, 25(1), 1224. <https://doi.org/10.1186/s12889-025-21813-5>

¹⁹ Whitzman, C. (2026).

Point-in-Time Counts also show that women comprise a sizeable share of homelessness data across Calgary (29%), Toronto (41%), and Vancouver (31%), yet capture only visible homelessness and do not reflect the gendered nature of housing precarity, where women often cycle between supports and informal living arrangements.²⁰ Given that existing data indicate women comprise up to 29-41% of the visible homeless population, and that current data frameworks systematically undercount hidden homelessness, a 40% allocation for affordable and deeply affordable housing represents a practical, evidence-informed baseline for targeting housing need.

- **Commit to a 20% annual increase in the proportion of non-market homes** that are permanently affordable, with rents and sale prices based on construction and material costs rather than market demand, toward a target of 20% of all homes by **2060**.²¹
- **Commit to delivering a minimum of 1.2 million net new deeply affordable homes** between **2028 and 2040**, including new-builds, acquisitions, and renovations, alongside wraparound, gender-responsive and culturally appropriate supports to eliminate chronic and episodic homelessness.²²

WNHHN would welcome the opportunity to appear before the Committee to discuss Bill C-20 and further expand on the issue of gender-based housing precarity in Canada. We look forward to working collaboratively with Parliamentarians and all levels of government to advance our shared goal of strengthening housing outcomes in Canada.

²⁰ Calgary Homeless Foundation. (2025). *Point-In-Time Count. 2024*. https://www.calgaryhomeless.com/wp-content/uploads/2025/08/2024_PIT-Report_Final.pdf

Homelessness Services Association of BC. (2025). *2025 Point-in-Time Homeless Count in Greater Vancouver*. https://hsa-bc.ca/Library/2024_25_HC/2025_PiT_Homeless_Count_for_GV_Preliminary_Data_Report_250730.pdf

City of Toronto. (2025). *2025 Point-in-Time Count*. <https://www.toronto.ca/wp-content/uploads/2025/07/9790-street-needs-assessment-report-2024.pdf>

²¹ Whitzman, C. (2026).

²² Whitzman, C. (2026).