



WOMEN'S NATIONAL
HOUSING & HOMELESSNESS
NETWORK

**INVESTING IN GENDER-
RESPONSIVE HOUSING
OUTCOMES**

Written Submission for the Pre-Budget Consultations
in Advance of the Upcoming Federal Budget

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Submitted by the Women's National Housing & Homelessness Network

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List of Recommendations

1. Revitalize the **National Housing Strategy (NHS) 2027-2037** to better reflect Canada's *National Housing Strategy Act* and, in doing so, commit to ending homelessness, low-income housing need, as well as setting clear definitions, timelines and goals.
2. Commit to implementing the **Neha Review Panel recommendations** and realizing the right to housing for women and gender-diverse people in Canada.
3. Ensure that the **Urban, Rural, and Northern Indigenous Housing Strategy** is grounded in **For-Indigenous, By-Indigenous** solutions developed in close partnership with Indigenous housing providers and knowledge holders.
4. Ensure that **Build Canada Homes (BCH)** functions as a rights-based, equity-driven national housing delivery system that guarantees deep affordability, advances gender and Indigenous equity, and is accountable for achieving the goal of eliminating homelessness.
 - Embedding an enhanced **Gender-Based Analysis Plus (GBA+)** approach informed by Indigenous knowledge and co-developed with women and gender-diverse people with lived experience of homelessness and housing insecurity, to guide housing-related decision-making and funding.
 - Allocate a minimum of **40%** of all affordable and deeply affordable housing units to women and gender-diverse people.
5. Maintain and stabilize funding for **Women and Gender Equality Canada (WAGE)** to ensure adequate funding for the violence against women (VAW) shelter and transition house (TH) sector, as well as core community-based, feminist, survivor-serving organizations.

Introduction

The Women's National Housing and Homelessness Network (WNHHN) is a national collective that is focused on research and advocacy to advance critical policy change aimed at eliminating gendered homelessness. Over the years, our work has demonstrated that, amid Canada's growing housing crisis, women and gender-diverse people have experienced some of the most severe impacts of core-housing-need and homelessness due to persistent gender-based inequities. They often experience hidden forms of homelessness, such as remaining in abusive relationships to maintain shelter, living in unsafe or inadequate housing to keep families together, engaging in survival sex for shelter, or couch-surfing and staying with friends or family when safe, affordable housing and shelter options are unavailable. This invisibility contributes to undercounting in data and service systems, resulting in their needs being overlooked in policy design, funding allocation, and access to housing supports.

At present, there is a glaring scarcity of gender-responsive, trauma-informed housing, especially for Indigenous women and their families, who are overrepresented in data on homelessness and violence in Canada.¹ Canada cannot claim to be on the path to becoming one of the strongest economies in the G7 while ignoring the systemic inequities that entrench these groups in chronic poverty and homelessness. As our country moves toward the renewal of its housing policies and investments, there is an urgent need for a coordinated, rights-based approach that recognizes housing as a human right and meaningfully prioritizes those most impacted by the housing crisis.

Recommendation #1: Revitalize the National Housing Strategy 2027-2037 to better reflect Canada's *National Housing Strategy Act*.

While the introduction of the NHS in 2017 was a first-of-its-kind initiative in providing a more coordinated approach to addressing housing need, and alleviating the burden of responsibility from the provinces and territories, NHS initiatives have also been riddled with inconsistencies in affordability criteria and falling short of meeting housing targets. For instance, through the Apartment Loan Construction Program, the NHS provided \$55 billion in low-cost loans to developers; however, only 3% of resulting units were found to be affordable to households in core-housing-need.² Substantial public funding is being directed toward housing that remains

¹ 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.

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>

inaccessible to those most in need, while new units sit vacant and homelessness shelters and transitional housing systems are overwhelmed with demand.

The current NHS is set to expire in the 2027-2028 fiscal year, and a new framework is underway. It is critical now that a revitalized Strategy adopts a gender-responsive, rights-based approach, with clear targets, timelines and definitions for housing that is affordable, adequate, and accessible. Current definitions of “affordability” are broad, inconsistent, and insufficiently targeted to those in core-housing-need, allowing programs to meet affordability criteria on paper while remaining out of reach in practice.

Echoing the definitions advanced by the Canadian Human Rights Commission (CHRC) and leading housing expert Whitzman,³ WNHHN calls on the federal government to:

- Define and apply **housing affordability** as housing costs not exceeding 30% of before-tax household income, with the commitment that housing costs do not compromise the ability to meet other basic needs, such as food.
- Define and apply **"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.

We also call on the federal government to end homelessness by **2040**, low-income housing need by **2050**, and ensure universal access to an affordable home by **2060**.⁴

- Commit **2% of GDP annually** (\$47.4 billion in the 2027–28 fiscal year) over the next decade to finance and support the development of two million community housing units.
- This includes public, cooperative, non-profit, and community land trust housing, with affordable, adequately-sized homes for very-low- to median-income households.

Lastly, recognizing the diverse needs within our communities, we call for a revitalized NHS to include **universal design principles**, with the inclusion of these principles in all multi-unit building developments. We also echo the Canadian Disability Alliance’s⁵ call to ensure:

- 50% of all retrofits for primary residences are reimbursed for persons with disabilities.
- That the federal government review emergency shelters and provide necessary funding to ensure accessibility features and policies.

³ Whitzman, C. (2026).

⁴ National Right to Housing Network. (2026). *Leave No One Behind*. <https://housingrights.ca/wp-content/uploads/NRHN-BudgetConsultationSubmission-FINA-final-May-2026.pdf>

⁵ Canadian Disability Alliance. (2026). *CDA Submission to 2026 Federal Budget Final April 1 2026*. <https://www.ourcommons.ca/Content/Committee/451/FINA/Brief/BR14006118/br-external/CanadianDisabilityAlliance-e.pdf>

Recommendation #2: Implement the Neha Review Panel recommendations on the right to housing for women and gender-diverse people.

Women and gender-diverse people are historically underrepresented in the housing and infrastructure development sector.⁶ Recognizing this, we call on the federal government to invest in targeted skills- and capacity-building for women and gender-diverse people to participate in all aspects of housing development. This includes increased employment and involvement in planning, trades, construction, and infrastructure development in all upcoming BCH programs and initiatives. We are also calling for skills- and capacity-building initiatives in sustainable, climate-resilient building practices and for the increased involvement of these groups in the construction sector.

For women and gender-diverse people, climate change increases vulnerability to housing insecurity. This is especially acute during climate-related events (e.g. floods, wildfires), when the lack of safe, gender-responsive housing or shelter limits opportunities for relocation. In the absence of such spaces, women are often forced to enter unstable, unsafe or informal living arrangements, particularly in the context of caregiving responsibilities.

We call on the federal government to ensure the meaningful involvement of women and gender-diverse people in the design, planning, and implementation of climate-resilient strategies. This includes ensuring that new affordable housing developments are located outside of high-flood or wildfire-risk zones, and that existing structures in high-risk areas are retrofitted.

Recommendation #3: Ensure that the Urban, Rural, and Northern Indigenous Housing Strategy is grounded in For-Indigenous, By-Indigenous solutions.

While the Urban, Rural, and Northern Indigenous Housing Strategy demonstrates significant promise and commitment to addressing Canada's housing crisis, its success will depend on clear accountability mechanisms grounded in For Indigenous-By Indigenous approaches that are responsive to the distinct housing needs of Indigenous women, gender-diverse people, and their families.

This should include:

⁶ WNHHN. (2025). *Housing Justice Starts with Us*. https://womenshomelessness.ca/wp-content/uploads/WNHHN_Written-Submission-to-Neha-Review-Panel_FINAL_April-2025.pdf

- Co-developing program design, implementation and evaluation processes for affordable housing initiatives through consultation with lived experts, including single parents, Indigenous Elders, and survivors of violence to better understand housing development priorities and funding allocation.
- Ensure **OCAP® (Ownership, Control, Access, and Possession)**⁷ principles are embedded across Indigenous housing initiatives and that projects are led in partnership with Indigenous housing providers.

Recommendation #4: Ensure that Build Canada Homes (BCH) functions as a rights-based, equity-driven national housing delivery system.

Canada cannot build its way out of the current housing crisis hoping that affordability will emerge as a byproduct. BCH has committed to developing affordable housing – but affordable housing for whom? To date, BCH has not clearly defined priority populations, nor has it indicated alignment with the NHS’s prioritization of women, particularly Indigenous women, racialized women, and gender-diverse people.

National data shows that 19.4% of all households in core-housing-need are lone-parent families, with women-led households approximately 35% more likely to be in core-housing-need than those led by men.⁸ In jurisdictions with a high proportion of Indigenous residents, such as the Northwest Territories, Indigenous households are 1.3 times more likely to be in core-housing-need or to live in overcrowded dwellings than non-Indigenous households.⁹

Point-in-Time Counts also show that women comprise a substantial proportion of people experiencing homelessness each year across cities including Calgary (29%), Toronto (41%), and Vancouver (31%).¹⁰ Yet these counts capture only visible homelessness and often miss the

⁷ First Nations Information Governance Centre. (2014). *Ownership, Control, Access and Possession (OCAP®): The path to First Nations information governance*. <https://fnigc.ca/ocap-training/>

⁸ Canada Mortgage and Housing Corporation. (2025). *Core housing need and gender*. <https://www.cmhc-schl.gc.ca/observer/2025/core-housing-need-gender>

⁹ 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>

¹⁰ Calgary Homeless Foundation. (2025). *Point-In-Time Count Report*. 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>

gendered patterns of housing precarity, where women often move between temporary emergency supports, informal living arrangements, or unsafe relationships to maintain shelter.¹¹

We urgently call on the federal government to:

- Develop and embed an **enhanced Gender-Based Analysis (GBA+)** Framework into BCH, rooted in Indigenous knowledge and co-developed with women and gender-diverse people with lived experience of homelessness and housing insecurity.
- Allocate **40% of affordable and deeply-affordable housing units** to women, gender-diverse people, as well as their families, recognizing that women remain chronically undercounted in official homelessness data.
- 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.¹²

Recommendation #5: Maintain and stabilize funding for Women and Gender Equality Canada (WAGE).

In the *Unaddressed* report, our most recent study on gendered housing insecurity and homelessness in the City of Calgary, nearly 60% of all women and gender-diverse participants reported experiencing some form of trauma or abuse, and almost two-thirds (64%) experienced homelessness.¹³ These findings reinforce what frontline organizations and survivors have long identified consistently across the country: homelessness, gender-based violence (GBV), and housing insecurity are deeply interconnected. Yet despite growing need, women's shelters, transition houses, and survivor-serving organizations continue to face chronic underfunding, staffing shortages, and overwhelming demand.

Sustained and stabilized federal investment through WAGE is critical to ensuring that women, girls, and 2SLGBTQI+ people can access the safety, supports, and housing pathways they need, not only in moments of crisis, but in rebuilding long-term stability and wellbeing.

The persistent siloing of GBV and homelessness systems too often treats safety, housing, and poverty as separate issues despite their deep interconnections.

¹¹ Schwan, K., et al. (2020).

¹² Whitzman, C. (2026).

¹³ Baig, K., Samimi, P., Sherwani, A., Eiboff, F., Seccia, S. (2026). *Unaddressed. The State and Scale of Housing Insecurity & Homelessness Experienced by Women & Gender-Diverse People in Calgary*. <https://www.unaddressed.ca/report-resources>

We therefore urge the Canadian government to advance integrated, cross-sectoral responses that recognize housing as a critical component of violence prevention and survivor safety, including strengthened coordination between GBV, homelessness, mental health, income support, and housing systems.