

# Written Submission for Build Canada Homes – Market Sounding Guide

**By: Women's National Housing & Homelessness Network**

## **Key contacts**

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## **List of Recommendations**

- **Recommendation 1:** Develop an enhanced Gender-Based Analysis Plus (GBA+) framework specifically focused on housing development, in collaboration with community partners and voices with lived experience.
- **Recommendation 2:** That, in alignment with the review by the National Housing Council on the right to housing for women, Two Spirit, Trans, and gender-diverse people, the federal government commit to ending homelessness, and revitalize the National Housing Strategy in accordance with the human right to housing, as required under s. 5 of the *National Housing Strategy Act*. This includes establishing concrete goals and timelines to end homelessness (like Canada's carbon goals to cut emissions by 50% by 2035) with a particular focus on improving housing outcomes for persons in greatest need (e.g., those experiencing homelessness or housing precarity)
- **Recommendation 3:** That the government allocate 40% of affordable and deeply affordable housing units for women, Two-Spirit, trans, and gender-diverse people that are developed through various initiatives to meet the government's campaign promise goal of building 500,000 housing units a year.

## Introduction

Canada is in the midst of a housing crisis, but for women and gender-diverse people, the crisis is uniquely dangerous, invisible, and ignored.

Canada cannot end homelessness while ignoring how it disproportionately impacts women, girls, and gender-diverse people. Yet, governments continue to focus narrowly on visible, chronic homelessness, leaving the most marginalized behind.

One of the most significant barriers to addressing gendered homelessness in Canada is the narrow focus of governments on visible homelessness, often defined as rough sleeping or “unsheltered homelessness.” Federal investments and programs such as Reaching Home and its predecessor, the Homelessness Partnering Strategy, prioritize chronic homelessness, but rely on definitions that overlook the hidden and often gendered realities of housing precarity experienced by women, girls, women-led families, and gender-diverse people.

These experiences frequently include:

- Remaining in abusive relationships to avoid homelessness;
- Living in unsafe or inadequate housing to keep families together or retain custody of children;
- Engaging in survival sex for shelter;
- Couchsurfing to avoid shelters that are unsafe or unavailable.<sup>i</sup>

These forms of homelessness are less visible but no less severe. Yet, because they fall outside the federal definition of chronic homelessness, they remain undercounted, underfunded, and ultimately unaddressed.

Critically, the National Housing Strategy, released in 2017, was never updated in accordance with the 2019 legislative requirements under s. 5 of the *National Housing Strategy Act* and the progressive realization of the human right to housing as articulated in the *International Covenant on Economic, Social, and Cultural Rights*.

There is a glaring scarcity of women-only, trauma-informed housing, especially for Indigenous women and their families, who are overrepresented in data surrounding homelessness and violence in Canada.<sup>ii</sup>

Without these supports, Indigenous women and gender-diverse people are more vulnerable to child apprehension, as housing instability is often misinterpreted as neglect by child welfare systems. Ignoring these realities is counterintuitive to the federal government’s commitment to ending the systemic separation of Indigenous families.<sup>iii</sup>

***We have received endorsements from these organizations for this submission: the National Indigenous Women’s Housing Network and National Association of Women and the Law (NAWL), and the National Right to Housing Network.***

## **Recommendation 1: Develop an enhanced Gender-Based Analysis Plus (GBA+) framework specifically focused on housing development, in collaboration with community partners and voices with lived experience.**

Current plans on Build Canada Homes show great potential, particularly for creating strong gendered outcomes. But, this cannot happen without specific framework and toolkit that incorporates and builds gender-responsiveness into all aspects of policy design and delivery. The Women's National Housing and Homelessness Network (WNHHN) has spent the past five years specifically researching and building evidence on pathways that lead women and gender-diverse people to disproportionate housing insecurity and homelessness, exposing them to violence and trauma.

As a solution, we are proposing that Build Canada Home develop a community-led body that takes the lead on developing an enhanced Gender-Based Analysis+ (GBA+) framework focused specifically on housing outcomes for women and gender-diverse people at intersections of multiple marginalizations, such as disability, racialization, dependence on income assistance and gender-based violence.

This enhanced framework must involve expansion and testing of the Government of Canada's existing Gender-Based Analysis+ (GBA+) framework, with a focus on ensuring: (1) it results in equity for multiply marginalized women and gender-diverse people, who experience discrimination and exclusion at numerous intersections of their identities; and (2) it is meaningfully and consistently applied across all housing policymaking and program execution processes, from identifying public lands for housing development to collaboration with builders and partners and the construction of housing.

This framework must be developed with strong leadership from community organizations, lived expert leadership, aligned with Canada's human rights commitments, and be accountable to affected communities. Given WNHHN's expertise in gender and housing, WNHHN is in a strategic position to collaborate directly with the government in bringing together community organizations to lead the development of this tool.

## **Recommendation 2: That, in alignment with the review by the National Housing Council on the right to housing for women, Two Spirit, Trans, and gender-diverse people, the federal government commit to ending homelessness, and revitalize the National Housing Strategy in accordance with the human right to**

## **housing, as required under s. 5 of the *National Housing Strategy Act*.**

Federal housing investments have fallen far short of their targets. A 2020 internal evaluation by the Canada Mortgage and Housing Corporation (CMHC) found that National Housing Strategy (NHS) initiatives were expected to assist just over 61,600 households, only 38% of the NHS's annual targets over three years, even under optimistic assumptions. Critically, the evaluation did not report actual reductions in core housing need (CHN) or chronic homelessness, making it impossible to assess real outcomes.

NHS funding has also been misaligned with the needs of low-income households. For example:

- Only 4% of units funded by the \$26 billion Rental Construction Financing Initiative met the needs of low-income families.
- Just 35% of units supported by the \$13 billion National Housing Co-Investment Fund were affordable to those most in need.
- In contrast, the \$2.5 billion Rapid Housing Initiative, though smaller and lacking long-term funding, exceeded its initial targets—delivering over 10,000 deeply affordable homes in less than two years.<sup>iv</sup>

Women and gender-diverse people, particularly Indigenous women, those with disabilities, single mothers, 2SLGBTQIA+ communities, refugees, and migrants—are among those most affected by this underinvestment. Research shows that 19% of single mother-led households are in core housing need. Many live on low or very low incomes, able to afford a maximum of \$1,050 in rent per month. Yet, as of August 2023, the average rent for a single room across Canada was \$1,450.

There is an urgent need for sustained, large-scale investments in non-market housing, guided by gender-based targets and outcome monitoring. Build Canada Homes plans are focused on housing at scale and particularly mentions supportive and transition housing solutions. We agree that these solutions are critical, and in partnering with appropriate community housing providers to develop these kinds of housing solutions, it is critical that a human rights approach be taken and access is low barrier, particularly for those with complex challenges. Solutions should particularly focus on women and gender-diverse individual in lone-parent families, living with disabilities, aging out of care and seniors, many of whom are not eligible for conventional gendered housing solutions that have historically prioritized transitional programming for women fleeing intimate partner violence.

Currently, many gender-focused housing service providers have the ability to provide these at scale solutions, but would need additional approaches and supports to develop readiness and expedite their abilities to develop and provide such housing. Gender-focused solutions are critical, and under the National Housing Strategy Act, the government's commitment to human right to housing stipulates setting up of goals and targets focused on meeting the right to housing for all Canadians. In this regard, we specifically call for a human right lens to be adopted in setting gender-focused goals and outcome targets for Build Canada Homes, specifically understanding and addressing

trajectories of women and gender-diverse people falling into homelessness and the lack of adequate and appropriate solutions catered to them.

**Recommendation 3: That the government allocate 40% of affordable and deeply affordable housing units for women, Two-Spirit, trans, and gender-diverse people that are developed through various initiatives to meet the government's campaign promise goal of building 500,000 housing units a year.**

Our recommended allocation is informed by many factors, firstly acknowledging that core housing need is an insufficient measure and does not account for women and gender-diverse people who are students, living in shelters or transitional housing, those who are homeless or those who are institutionalized due to lack of stable and accessible housing options. Our recommendation is also acknowledged by our own research, which clearly indicates that due to the hidden and invisible nature of gendered homelessness, many women in need of housing are not captured in official counts and statistics. This includes women and gender-diverse people who are couch surfing, continuing to live with abusive partners due to a lack of alternative safe and affordable options, and those who are finding shelter in other places due to a lack of safe shelter options.

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<sup>i</sup> WNHHN (2022). *The Crisis Ends With Us: Request for a Review into the Systemic Denial of Equal Housing Rights for Women and Gender-Diverse People in Canada*. <https://womenshomelessness.ca/wp-content/uploads/WNHHN-Claim-15-June-2022.pdf>

<sup>ii</sup> Ibid.

<sup>iii</sup> Indigenous Service Canada. *Bill C-92: An Act respecting First Nations, Inuit and Métis children, youth and families receives Royal Assent*. Government of Canada. <https://www.canada.ca/en/indigenous-services-canada/news/2019/06/an-act-respecting-first-nations-inuit-and-metis-children-youth-and-families-receives-royal-assent.html>. Accessed July 7, 2025.

<sup>iv</sup> Whitzman (2023). *A Human Rights-Based Calculation of Canada's Housing Shortages*. Commissioned by the Office of the Federal Housing Advocate.