



WOMEN'S NATIONAL
HOUSING & HOMELESSNESS
NETWORK

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BARRIERS TO REACHING HOME: DISABILITY, GENDER, AND HOUSING INSTABILITY IN CANADA

Submission to the Committee on the Rights of People with Disabilities on the draft guidelines on addressing multiple and intersectional forms of discrimination against women and girls with disabilities

By the Women's National Housing & Homelessness Network

In Canada, lived experiences of homelessness and housing insecurity remain deeply entangled with ableism and accessibility challenges endured by the 27% of Canadians living with disabilities, 50% of which are unemployed and depend on government housing assistance.¹ Nearly half of all Canadian women who reported experiences of homelessness have either had or continue to live with a disability, with the barriers to secure both affordable and accessible housing being higher and further entrenched in gender-based, systemic inequalities that exacerbate their neglect and social isolation.² When the promise of accessible, affordable housing collides with the reality of shelters, housing programs and service provision that fail to account for accessibility – the result is deepened vulnerability amongst these groups, who already experience a heightened susceptibility for poverty, homelessness, and exposure to intimate-partner-violence (IPV), with limited avenues for safety.³

In their submission to the Office of the United Nations High Commissioner for Human Rights (OHCHR) pertaining to the Convention on the Rights of Persons with Disabilities (CRPD), the Women's National Housing and Homelessness Network (WNHHN) finds that the state of housing in Canada violates Articles 5, 6, 9 and 16 – remaining fundamentally unequipped to respond to the multi-faceted barriers that women, girls, and gender-diverse people living with disabilities navigate amidst the nation's widespread housing crisis.

Ableism, at the intersection of housing precarity, has deepened inequities, persisting through a lack of accessible housing in both urban and rural contexts and directly constraining opportunities for already-limited employment and participation in community life for women and gender-diverse people.⁴ This lack of accessibility, amidst a glaring affordability crisis, is made worse through inadequate provincial and federal disability supports in tandem with poor housing legislation (i.e. tenancy rights), which fail to insulate vulnerable groups from poverty, housing-related discrimination and homelessness.⁵ WNHHN's Pan-Canadian research on women's housing noted an even higher number, with 79% of women who had reported housing insecurity or homelessness, reporting experiences with some form of disability, with almost half

¹ Hébert, B.-P., Kevins, C., Mofidi, A., Morris, S., Simionescu, D., & Thicke, M. Statistics Canada. (2024, May 28). "A Demographic, Employment and Income Profile of Persons with Disabilities Aged 15 Years and Over in Canada, 2022." *Reports on Disability and Accessibility in Canada*. <https://www150.statcan.gc.ca/n1/pub/89-654-x/89-654-x2024001-eng.htm>

² Lalonde, D., & Baker, L. (2019). Women with Disabilities and D/deaf Women, Housing, and Violence. *Learning Network Issue 27*. London, Ontario: Centre for Research & Education on Violence Against Women & Children. ISBN # 978-1-988412-28-3

³ Schwan, K., Vaccaro, M., Reid, L., Ali, N., & Baig, K. (2021). *The Pan-Canadian Women's Housing & Homelessness Survey*. Toronto, ON: Canadian Observatory on Homelessness.

⁴ "Like a jail": Advocates say a disability can make rural Alberta unlivable. (2024, December 12). CTVNews. <https://www.ctvnews.ca/edmonton/article/like-a-jail-advocates-say-a-disability-can-make-rural-alberta-unlivable/>

⁵ Women's National Housing & Homelessness Network. (2023, March 31). *Gendered evictions in financialized housing markets across Canada: The case for human rights intervention and oversight*. <https://womenshomelessness.ca/wp-content/uploads/Submission-to-the-NHC-Review-Panel-NRHN-WNHHN-31-March-2023-FINAL.pdf>

of the sample (46.4%) reporting a psychiatric or mental health disability of some kind.⁶ These structural failures converge in shelter environments and service provision, where meeting accessibility and safety needs remain to be challenging. This moreover leads many into unconventional – and potentially unsafe – housing arrangements which often render their housing precarity invisible, thereby obscuring the full extent of homelessness among women and gender-diverse people living with disabilities.

1. The Relationship Between IPV and Housing Precarity for Women and Gender-Diverse People Living with Disabilities

In 2018, Statistics Canada reported women with disabilities have a significantly higher prevalence of IPV compared to those without disabilities – being four times more likely to be sexually assaulted than their counterparts.⁷ Available data demonstrates a positive relationship between IPV and disability in Canada – with 50% of women and girls, who live with a disability, reporting some form of IPV since the age of 15.⁸ This number rises to 60% and 70% for women and girls who experience two and three to four forms of disabilities, respectively.⁹

While the proportion of disabilities among women and gender-diverse people that can be attributed to IPV remains unknown, 92% of all IPV incidents in Canada involve head trauma or strangulation, which Brain Injury Canada reports to be the most common causes of cognitive disabilities that are not innate at birth.¹⁰ Not only does this position women and gender-diverse people at a heightened-risk of developing physical or cognitive disabilities as a consequence of IPV, but it also presents a myriad of compounded challenges for women and gender-diverse people with existing disabilities – namely the affordability-related barriers that exist with escaping violence, such as having economic dependence on their abusers to avoid homelessness or inaccessible shelter environments.¹¹

As it stands, experiencing a breakup is already the primary reason that women and gender-diverse people lose their most recent housing.¹² Given that there is an 11.3 percentage points gap between the employment rates of core-aged women with and without disabilities, it can be inferred that women and gender-diverse people with disabilities face heightened economic insecurity, further

⁶ Schwan, K., Vaccaro, M., Reid, L., Ali, N., & Baig, K. (2021). The Pan-Canadian Women's Housing & Homelessness Survey. Toronto, ON: Canadian Observatory on Homelessness. <https://womenshomelessness.ca/wp-content/uploads/EN-Pan-Canadian-Womens-Housing-Homelessness-Survey-FINAL-28-Sept-2021.pdf>

⁷ Savage, L. Canadian Centre for Justice and Community Safety Statistics, (2021, April 26). *Intimate Partner Violence: Experiences of Women with Disabilities in Canada, 2018*. <https://www150.statcan.gc.ca/n1/pub/85-002-x/2021001/article/00006-eng.htm>

⁸ Ibid.

⁹ Ibid.

¹⁰ *Intimate partner violence & brain injury*. (n.d.). Brain Injury Canada. <https://braininjurycanada.ca/en/caregiver/issues-advocacy/intimate-partner-violence/>

¹¹ Schwan, K., Vaccaro, M., Reid, L., Ali, N., & Baig, K. (2021). *The Pan-Canadian Women's Housing & Homelessness Survey*. Toronto, ON: Canadian Observatory on Homelessness.

¹² Ibid.

constraining their ability to leave violent relationships or secure both affordable and stable housing.¹³ This is coupled with the reality that shelter infrastructure is often inaccessible and not designed for mobility-related, cognitive, or sensory needs. As a result, many women and gender-diverse people who live with disabilities are more likely to engage in high-risk survival strategies to retain housing, namely tolerating abuse because they perceive shelters and related supports (i.e. crisis lines) to be unequipped in addressing their needs – ultimately rendering the nature of their housing precarity as invisible.¹⁴ This results in the systemic undercounting of women and gender-diverse people with disabilities in homelessness data and policy frameworks and leads to a reduced allocation of affordable and accessible housing units, shelter spaces and programs, funding as well as all other resources dedicated to supporting women and gender-diverse people fleeing IPV.¹⁵

2. Dual Accessibility and Affordability Gaps in Housing Infrastructure

Adequate housing extends beyond merely four walls and a roof – rather, accessibility of shelter itself is a central element for the 1.6 million impoverished Canadians with disabilities to live in dignity.¹⁶ In June 2025, Canada’s Federal Housing Advocate asked the Government of Canada to examine the lack of accessible housing across the country and pointed to how people with disabilities are overrepresented in all aspects of both inadequate housing and homelessness caused by unaffordability.¹⁷ This is coupled with reports of people with disabilities choosing medical assistance in dying (MAiD) because they cannot access the basic housing accessibility supports they require to live with dignity.¹⁸

Inaccessibility in housing manifests in multiple ways, including both physical and cognitive barriers – such as buildings that are not accessible by wheelchair, inaccessible to public transportation, lack clear signage or involve housing processes that are difficult to navigate, furthermore limiting an individual’s participation in daily activities or necessary employment. Within residential units themselves, inaccessibility can take the form of inadequate bathroom facilities, narrow doorways, layouts that impede mobility (i.e. stairs), as well as insufficient support for cognitive or sensory needs exacerbated (i.e. noise-insulating windows). For women and gender-diverse people living with disabilities, housing accessibility is deeply intertwined with housing safety. Through a gendered lens, this includes poorly lit or unsurveilled common areas,

¹³ Vergara, D., & Hardy, V. Statistics Canada. (2024, June 13). *Labour Statistics at a Glance: Labour Market Characteristics of Persons with and Without Disabilities, 2023*. <https://www150.statcan.gc.ca/n1/pub/71-222-x/71-222-x2024002-eng.htm>

¹⁴ Schwan, K., Vaccaro, M., Reid, L., Ali, N., & Baig, K. (2021). *The Pan-Canadian Women’s Housing & Homelessness Survey*. Toronto, ON: Canadian Observatory on Homelessness.

¹⁵ Ibid.

¹⁶ *Canadian Survey on Disability, 2017*. (2018, November 28). Statistics Canada. <https://www150.statcan.gc.ca/n1/daily-quotidien/181128/dq181128a-eng.htm>

¹⁷ *Federal Housing Advocate calls for hearing into lack of accessible housing in Canada*. (2025, June 12). Canadian Human Rights Commission. <https://www.chrc-ccdp.gc.ca/resources/newsroom/federal-housing-advocate-calls-hearing-lack-accessible-housing-canada>

¹⁸ Ibid.

layouts that compromise safety – such as isolated stairwells or entrances that impact safety at the intersection of mobility – as well as residential units that lack lockable doors or compromise accessible access for personal safety. These barriers not only limit mobility and independence but also heighten vulnerability to harassment, reduce the ability to streamline daily routines in a safe manner, and constrain participation in communal or supportive activities.

Inaccessibility of housing, at the intersection of unaffordability, also creates a dual burden that systematically excludes women and gender-diverse people from the possibility of safe and stable homes. As it stands, the gendered wage gap plays a significant role in housing unaffordability for women and gender-diverse people, who make 88 cents to every dollar men earn.¹⁹ In addition to lower employment rates compared to able-bodied women and gender-diverse people, this pay disparity is compounded for those with disabilities aged 25-65, who earn 22.2% less than persons without disabilities and 46.4% less in the advent of cognitive disabilities.²⁰ As a result, affordability issues for these groups are multiply exacerbated, forcing many to choose between housing that is affordable, but both inaccessible and unsafe, or housing that is accessible, yet unaffordable – potentially leading to other basic needs (i.e. food) going unmet.²¹

3. Rural Housing and Community Accessibility Challenges

Rural communities across Canada bear the brunt of accessibility challenges, where it is virtually impossible to travel without a car and infrastructure often does not consider wheelchair accessibility, people living with disabilities are forced to be dependent on others or risk going without essentials, food, medical visits and social connection. In Alberta, for instance, 59% of people living with disabilities report barriers to accessing public spaces, in both urban and rural areas.²² Where a resource such as public transport inaccessibility poses a series of challenges in urban areas, it is altogether unavailable in rural counterparts.²³ The province is only one of the two outliers – the latter being Prince Edward Island – across the country with no existing accessibility legislation that would otherwise mandate government housing and community facilities to consider the needs of people who live with disabilities.²⁴

¹⁹ Canadian Chamber of Commerce & Business Data Lab. (2024, March). *Barely breaking ground: The slow stride of progress for women in business leadership and entrepreneurship*. https://businessdatalab.ca/wp-content/uploads/2024/03/Barely_Breaking_Ground_March_2024.pdf

²⁰ McDiarmid, C., Statistics Canada. (2023, June 27). *Earnings pay gap among persons with and without disabilities, 2019*. <https://www150.statcan.gc.ca/n1/pub/89-654-x/89-654-x2023002-eng.htm>

²¹ Uppal, S. Statistics Canada. (2023, November 14). *Food insecurity among Canadian families*. <https://www150.statcan.gc.ca/n1/pub/75-006-x/2023001/article/00013-eng.htm>

²² 'Like a jail': Advocates say a disability can make rural Alberta unlivable. (2024, December 12). CTVNews. <https://www.ctvnews.ca/edmonton/article/like-a-jail-advocates-say-a-disability-can-make-rural-alberta-unlivable/>

²³ Ibid.

²⁴ Ryan, C. (2024, July 13). 'Opinion: Welcoming people with disabilities into the workforce is a win for everyone.' Calgary Herald. <https://calgaryherald.com/opinion/opinion-welcoming-people-with-disabilities-into-the-workforce-is-a-win-for-everyone>

Of the provinces which do have established accessibility frameworks, the cracks within the system are significant in rural areas – with rigid eligibility criteria and program inflexibility leaving many people without care for several hours out of the day.²⁵ In Manitoba, for example, people with disabilities have identified systemic gaps in access to 24-hour care for conditions such as cerebral palsy, since existing programs prioritize individuals with intellectual disabilities.²⁶ As a result, those affected often face constrained participation in care programs that operate on rigid schedules and lack accessible mobility options to seek alternatives.

For women and gender-diverse people living with disabilities, infrastructural barriers in undersourced areas carry compounded consequences, with limited access to essential support, transportation, and accessible healthcare contributing to a heightened risk for gender-based violence and an inability to flee or seek treatment for such circumstances. As it stands, women in rural areas are already at a higher risk for violence.²⁷ For those living with disabilities, inaccessible environments exacerbate dependence on abusers and reduce incentives or opportunities for victims of violence to get support, thereby rendering their experiences of housing precarity as invisible.²⁸ The convergence of gender, disability, geographic location and housing precarity create layered vulnerabilities that demand policy advancements that are responsive to the nuanced realities experienced by these populations.

4. Challenges with the Canada Disability Benefit (CDB)

Canada ratified the CRPD in 2010 and, since then, has introduced a range of federal initiatives aimed at realizing international obligations as well as supporting people living with disabilities, such as the *Accessible Canada Act* and the more recent *Canada Disability Benefit Act*, which came into full force in May 2025.²⁹ Although measurable progress has been made, available data demonstrates that these initiatives remain insufficient to address the persistent gaps in income support, housing accessibility, and protection from poverty for people living with disabilities. Through the Canada Disability Benefit (CDB), 600,000 Canadians are eligible to receive \$200 a month in income support – a number that is misaligned with the over 1.6 million Canadians who

²⁵ Dilello, T. (2025, August 7). “Rural disability advocate pleads for 24-hour support to ‘live fully’.” Winnipeg Sun. <https://winnipegsun.com/news/rural-disability-advocate-pleads-for-24-hour-support-and-to-live-fully>

²⁶ Ibid.

²⁷ Peek-Asa, C., Wallis, A., Harland, K., Beyer, K., Dickey, P., & Saftlas, A. (2011). Rural disparity in domestic violence prevalence and access to resources. *Journal of women's health* (2002), 20(11), 1743–1749. <https://doi.org/10.1089/jwh.2011.2891>

²⁸ Schwan, K., Vaccaro, M., Reid, L., Ali, N., & Baig, K. (2021). *The Pan-Canadian Women’s Housing & Homelessness Survey*. Toronto, ON: Canadian Observatory on Homelessness.

²⁹ Canada Disability Benefit Act, S.C. 2023, c. 17. Retrieved from the Justice Laws website: <https://laws-lois.justice.gc.ca/eng/acts/c-3.45/page-1.html>

live with disabilities and experience poverty.³⁰ Of the 600,000 eligible beneficiaries, the Government of Canada reports that only 25,000 individuals will be lifted out of poverty.³¹

There are additional barriers to accessing the CDB itself – particularly for those who are housing insecure – with applicants only being able to access the benefit through the National Disability Tax Credit (DTC) Program.³² This pathway presents a myriad of exclusionary challenges for people living with disabilities at the intersection of navigating homelessness, often requiring consistent access to healthcare providers to certify disability, a stable mailing address for correspondence, and in navigating complex administrative processes, all of which are difficult or impossible for those without secure housing or a caretaker. The Canadian Medical Association (CMA) also argues that the 45-minute DTC eligibility-screening places a strain on already overburdened healthcare system, projecting that health providers across the country will spend as much as 82,500 hours simply filing applications rather than turning their focus towards treating disabilities in the 2025-26 period, at a time when patients struggle to access timely care.³³

These challenges are intensified by income support clawbacks across the provinces, which seek to limit people living with disabilities from stacking financial benefits. Alberta, for instance, does not allow the CDB to be combined with its Assured Income for the Severely Handicapped (AISH), and reduces provincial disability support by \$200 for individuals receiving both streams of support.³⁴ This is despite the fact that the maximum monthly benefit of \$1,901 awarded from AISH is \$500 below the province's poverty line, with the program itself being subject \$49 million in funding cuts and a period of de-indexation during the COVID-19 pandemic, which prevented the benefit from keeping pace with inflation.³⁵ Similarly, other provinces, such as Saskatchewan and New Brunswick, mandate early withdrawal from the Canada Pension Plan (CPP) disability income at age 60 rather than 65, which permanently reduces monthly benefits, stripping aging Canadians of both financial stability and the choice to maximize income supports later in life, particularly in the advent of age-related disabilities.³⁶

³⁰ Laidley, J., & White, A. (2024, December 10). "Why the Canada Disability Benefit won't end disability poverty, and how it could." Maytree. <https://maytree.com/publications/why-the-canada-disability-benefit-wont-end-disability-poverty-and-how-it-could/>

³¹ Ibid.

³² Disability tax credit (DTC). (n.d.). Government of Canada. <https://www.canada.ca/en/revenue-agency/services/tax/individuals/segments/tax-credits-deductions-persons-disabilities/disability-tax-credit.html>

³³ Reimer, J. (2025, May 22). "Federal disability benefit welcome, but its red tape will tax health system." Canadian Medical Association. <https://www.cma.ca/about-us/what-we-do/press-room/commentary-federal-disability-benefit-welcome-its-red-tape-will-tax-health-system>

³⁴ Bellefontaine, M. (2025) 'AISH recipients panicked over looming provincial deadline: health providers.' CBC News. <https://www.cbc.ca/news/canada/edmonton/aish-recipients-panicked-over-looming-provincial-deadline-health-providers-1.7588697>

³⁵ Yousif, N. (2023). 'UCP's new budget met with outrage over the untying of disability benefits to inflation.' The Toronto Star. https://www.thestar.com/edmonton/ucp-s-new-budget-met-with-outrage-over-the-untying-of-disability-benefits-to-inflation/article_9cebad59-487d-5f6b-ba1e-1cb9b43bacc3.html

³⁶ Quon, A. (2025, January 21). "Appeal planned after challenge of Sask. government's disability program dismissed." CBC News. <https://www.cbc.ca/news/canada/saskatchewan/court-dismisses-challenge-disability-program-1.7437427>

5. Challenges with Provincial Disability Supports and Housing Policies

In tandem with the CDB, Maytree comparatively finds that provincial disability benefits do not lift a single example household across any province out of poverty, in part due to a failure in keeping pace with the rising cost of living and an absence of necessary provincial policies.³⁷ Such policy gaps are demonstrable in Nova Scotia, where the difference between the poverty line and the amount of disability support is highest across the country, with the province awarding the second lowest monthly benefit – after New Brunswick and the Northwest Territories – while also having the highest number of people with disabilities per capita.³⁸

Comparatively, despite Alberta's AISH being the highest monthly disability support amount across the country, it also fails to adequately address the financial needs of people living with disabilities in the province amidst a growing housing crisis.³⁹ This is partly due to the absence of concrete rent control policies that have allowed for average market rents to rise by 40% in a three-year period.⁴⁰ In 2022, it was determined that an annual household income of \$67,000 was needed to afford market rent in Alberta, with that number rising to \$84,000 in 2023, causing an affordability crisis that has, in turn, placed a strain on subsidized non-market housing as many households are priced out of their residences.⁴¹ AISH beneficiaries only make a maximum of \$22,812 a year – in cases where their disabilities prevent them from being employed – virtually disqualifying them from all market rent residences and forcing them to compete for housing amidst increasing levels of need in the province.

Additionally, in July 2026, all AISH recipients will be moved to the new Alberta Disability Assistance Program (ADAP), which reduces benefits by \$200 a month and requires recipients to undergo medical reassessment to maintain eligibility.⁴² The shift from AISH to ADAP risks housing instability, as reduced benefits and a burdensome reassessment process may leave individuals, especially those with cognitive or physical impairments, unable to afford rent amid rising living costs, on top of being barred from receiving the CDB.

The lack of organization present in Canada's piecemeal efforts to address accessibility needs (i.e. disability benefits) has led 75% of Canadian adults with intellectual disabilities to live in poverty, earning an average income that is less than half that of a Canadian without a disability.⁴³ With respect to women and gender-diverse people living with disabilities amidst these conditions

³⁷ CDB Clawback Map of Canada. (n.d.). Disability Without Poverty. <https://www.disabilitywithoutpoverty.ca/en/take-action/cdb-clawbacks>

³⁸ Ibid.

³⁹ Ibid.

⁴⁰ City of Calgary. (2023). *Housing needs assessment 2023*. <https://www.calgary.ca/communities/housing-in-calgary/affordable-housing-about.html>

⁴¹ Ibid.

⁴² Ministry of Assisted Living and Social Services. (n.d.). *Alberta Disability Assistance Program*. Government of Alberta. <https://www.alberta.ca/alberta-disability-assistance-program>

⁴³ *Income Security Inclusion Canada*. Webpage, Accessed July 21, 2025, <https://inclusioncanada.ca/campaign/income-security/>.

reproduces conditions of structural poverty and social exclusion that are key pathways into housing insecurity and homelessness.

6. Evictions and Accessibility Barriers in Shelters and Service Provision

Gender-based evictions are a key pathway into homelessness amongst women and gender-diverse people, with 90% of the people threatened with eviction for the actions of third parties being women, who are far more likely to be evicted for actions they did not personally commit, such as disturbances or police visits related to domestic violence.⁴⁴ Women and gender-diverse people who live with disabilities, and cannot afford housing on a government disability income, are particularly susceptible to eviction – with risk compounded by the intersection of gender and disability wage gaps, often resulting in low or unstable employment income, leaving them unable to pay rent and frequently lacking the resources to access legal support to contest evictions. This vulnerability is further compounded by the inaccessibility of provincial residential tenancy legislation for individuals with cognitive disabilities, resulting in evictions for disabled tenants being frequently underreported and under-researched. In some instances, underreporting is also driven by fear, as tenants risk blacklisting after involving a Human Rights Tribunal in tenancy disputes, as demonstrated in British Columbia.⁴⁵

7. Recommendations

- Reform the Canada Disability Benefit (CDB) by increasing benefit rates, expanding eligibility, and addressing provincial clawbacks that reduce effective support.
- We echo calls from other disability justice groups calling for universal design principles to be incorporated in the National Building Code to make universal design mandatory in all new multi-unit residential buildings, both rental and ownership.
- Allocate funding to retrofit existing shelters and housing stocks to meet accessibility standards, addressing physical, sensory, and cognitive needs.
- Increase funding for accessibility supports and accessible public transportation, particularly in rural areas.
- Ensure violence against women (VAW) programs and homeless shelters are fully accessible to people with physical, cognitive, and sensory disabilities.
- Decouple CDB eligibility from DTC to remove structural barriers to access.
- Index provincial disability benefits above the poverty line and allow income stacking to improve financial stability for people with disabilities.

⁴⁴ Smith, L. (2017) The Gendered Impact of Illegal Act Eviction Laws. *Harvard Civil Rights-Civil Liberties Law Review* <https://journals.law.harvard.edu/crcl/wp-content/uploads/sites/80/2017/07/Smith.pdf>

⁴⁵ Devor, A. (2020) Poverty Reduction in Trans, Non-Binary and Two-Spirit Communities. *Government of British Columbia*. <https://www2.gov.bc.ca/assets/gov/british-columbians-our-governments/initiatives-plans-strategies/poverty-reduction-strategy/2020-trans-plus-report.pdf>