

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

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

## **List of Recommendations**

- **Recommendation 1:** That the government invest \$50 million annually over 8 years in housing and homelessness supports and services designed to serve women and gender-diverse individuals by establishing an Indigenous-governed Gendered Homelessness Stream through Reaching Home (specifically focused on providing housing supports and services for all women, Two-Spirit, trans, and gender-diverse people in Canada).
- **Recommendation 2:** 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 3:** That the government invest an additional \$7 billion in the Urban, Rural and Northern Indigenous Housing Strategy delivered by NICH, ensuring Indigenous women, Two-Spirit, and gender-diverse people equitably benefit from all funds.
- **Recommendation 4:** 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 5:** 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.

## **Body of Submission**

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: Canadian Association of Elzabeth Fry Societies (CAEFS), Fédération des Femmes du Québec, the National Indigenous Women’s Housing Network, National Association of Women (NAWL) and the Law, and the National Right to Housing Network.***

**Additionally, we support the pre-budget submission recommendations of our partners at the National Right to Housing Network for the federal government to commit to:**

- Creating a plan to collect and disseminate better data on real tenant experiences
- Re-investing in the Tenant Protection Fund (a well delivered program by the Department of Justice) to support tenant organizing and build capacity for tenants and tenant advocacy/housing justice organizations to address systemic tenant legal issues
- Investing in more community housing—public, co-op, non-profit, and community land trusts
- Aligning government housing investment practices with human rights principles
- Outlining a plan to evaluate and implement a strategy on national rent regulation—including rent and vacancy control

**Recommendation 1: That the government invest \$50 million annually over 8 years in housing and homelessness supports and services designed to serve women and gender-diverse individuals by establishing an Indigenous-governed Gendered Homelessness Stream through Reaching Home (specifically focused on providing housing supports and services for all women, Two-Spirit, trans, and gender-diverse people in Canada).**

Establishment of a gender-specific homelessness stream under the Reaching Home strategy is long overdue. Women and gender-diverse people continue to fall through the gaps as gender-blind investments continue to dominate homelessness and housing policies in Canada. It's time to create a separate stream focused on gender-specific and gender-responsive interventions in housing and homelessness support services.

We are calling for the federal government to establish a Gendered Homelessness stream under Reaching Home, which is Indigenous governed, respecting Indigenous ways, but focused on benefitting all Canadians. The Indigenous governance is a central component of our recommendation recognizing that Indigenous women and gender-diverse people are disproportionately impacted by homelessness and violence and that Indigenous ways of doing bring a critical focus to restoring dignity and safety for all women and gender-diverse people. The stream should further be developed and established in collaboration with lived expert leadership and community partnerships.

We further recommend that the stream invest \$50 million annually over a course of 8 years in programs, services, and initiatives addressing needs of multiply marginalized women and gender-diverse people maintaining a deep commitment to harm reduction, trauma-informed interventions and cultural safety.

## **Recommendation 2: Develop an enhanced Gender-Based Analysis Plus (GBA+) framework specifically focused on housing development, in collaboration with community partners and voices with lived experience.**

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 3: That the government invest an additional \$7 billion in the Urban, Rural and Northern Indigenous Housing Strategy delivered by NICHI, ensuring Indigenous women, Two-Spirit, and gender-diverse people equitably benefit from all funds.**

Beyond the \$4.3 billion invested in Budgets 2022 and 2023, we are urging the federal government to allocate ongoing funds to the Urban, Rural and Northern Indigenous Housing Strategy, delivered by National Indigenous Collaborative Housing Inc. (NICHI). In March 2025, [NICHI celebrated an important milestone](#) of distributing \$275.2 million in federal funding to support 74 Indigenous-led housing projects across Canada. The funded projects are projected to create more than 3,800

housing units and represent a diverse range of solutions tailored to the unique needs of each community.

In the delivery of these funds, we call on the federal government and its delivery partner to ensure funds are equitably allocated to housing services led by Indigenous women and gender-diverse people for Indigenous women and gender-diverse people. These funds should also allocate critical resources for capacity-building programs for Indigenous housing providers that are focused on women and gender-diverse people, with specific focus on providers in the North.

**Recommendation 4: 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.

Despite an \$89 billion investment, the NHS has failed to fulfill its promise to realize the right to housing for those most in need. There is an urgent need for sustained, large-scale investments in non-market housing, guided by gender-based targets and outcome monitoring.

**Recommendation 5: 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.