



ECONOMIC JUSTICE AS A PATHWAY FOR ENACTING THE RIGHT TO HOUSING

Submission to the Neha Review Panel

SUBMITTED BY

BC POVERTY REDUCTION COALITION

2025

Introduction

The BC Poverty Reduction Coalition is comprised of over 80 organizations and community mobilizations that come together to advocate for public policy solutions to end poverty, homelessness and inequality in B.C. We aim to improve the health and well-being of all living in British Columbia. The Coalition advocates for a targeted and comprehensive poverty reduction strategy that prioritizes equity-seeking groups, and a whole government, cross-ministry approach to ending poverty.

The BC PRC understands poverty as a direct result of colonization, economic inequality, and policy choices that violate economic and social rights. Poverty is not an inevitable or naturally occurring phenomenon. Eradicating poverty is not an impossible or utopian dream but a reality requiring upstream, intersectional, systemic solutions. Nobody should live below the poverty line in a province as wealthy as BC. Poverty causes suffering, impacts the mental and physical health of families and communities, contributes to family violence, and continues to be a profoundly stigmatizing and disempowering experience for many people who call BC home.

This written submission is provided before the National Housing Council, concerning their Review on the Government of Canada's Failure to Prevent and Eliminate Homelessness among Women and Gender-Diverse People. The submission is on behalf of the BC Poverty Reduction Coalition, which is comprised of over 80 organizations and community mobilizations that come together to advocate for public policy solutions to end poverty, homelessness and inequality in B.C.

In this submission, we identify three key issues that deserve urgent human rights review: (1) Economic injustice and housing outcomes; (2) Hidden homelessness; and (3) Lack of accessible, multi-stage transitional housing.

Economic injustice and housing outcomes

Economic injustice and inequalities faced by women and gender-diverse people go hand-in-hand with the barriers to accessing adequate housing. Here we wish to focus on two specific ways: lack of access to a living-wage income, particularly for women with disabilities and LGBTQ2S+ peoples and the connection between gender-based violence and housing.

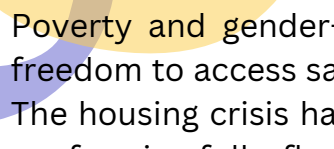
An element of adequate housing is affordability, which, in Canada, is defined as housing that costs less than 30% of a persons' pre-taxed income. Therefore, it is imperative to consider the impact and outcomes of income inequality and what it means for the right to housing. It has been documented that women are more likely than men to work in minimum-wage and part-time jobs, to suffer from chronic poverty, and to take care of children in single-parent households. This is compounded by intersectional oppressions, which in BC is seen through the impacts on racialised women, Indigenous women, disabled women, and recent immigrants who are more likely to have non-standard, precarious employment, which correlates with lower wages, job insecurity, and decreased access to adequate housing.

At this time, little data exists about the rates of income inequality amongst gender-diverse peoples, but when referring to LGBTQ2S+ data used in the Government of Canada 2SLGBTQI+ Action Plan, a significantly higher proportion of 2SLGBTQI+ Canadians (41%) had a total personal income of less than \$20,000 per year compared with their non-2SLGBTQI+ counterparts (26%). The average personal income of 2SLGBTQI+ income earners was also significantly lower (\$39,000) than those of non-2SLGBTQI+ (\$54,000) people in Canada.. [Data](#) from point-in-time homeless counts shows that the representation of women and 2SLGBTQI+ respondents was higher among youth than among older age groups. Further, approximately 25% of youth in homelessness cite poverty or lack of income as the reason they have lost housing. Because 2SLGBTQIA+ people experience poverty at higher rates, ensuring access for 2SLGBTQIA+ young people to stable employment and safe, affirming educational environments is essential to ending the cycles of economic instability and homelessness.

Data around poverty experienced by people with disabilities paints a similar picture. People with disabilities who live off social assistance and in poverty are disproportionately impacted by the rise of living costs as they have little room to adapt to the increased costs of housing and other necessities (1). When Disability Without Poverty conducted a survey regarding the national Canada Disability Benefit, people with disabilities painted a stark picture of the depth of poverty they were experiencing. Their [data](#) in BC shows that 500 of the 808 BC residents who responded to the survey were living off less than \$24,000 a year. They note that “some [respondents] commented that we should have further divided our lowest bracket of below \$24,000 a year to demonstrate those people living on less than this.” Alongside Disability Without Poverty, we wish to note that \$24,000 per year is already deeply below the poverty line. Although this data is not broken out by gender, [data](#) provided by the Council of Canadians with Disabilities shows that among people with disabilities living in poverty, 59% are women. It is not a stretch to correlate the number of disabled women living in poverty with 2018 [data](#) from CMHC documents that women with disabilities are more likely to live with core housing needs than people without disabilities and men with disabilities.



1. People with disabilities and disability justice advocates have rightfully pointed out that the \$200 per month to be received through the Canada Disability Benefit will not bring disabled people even close to the poverty line in any province and territory.



Poverty and gender-based violence work are tragically interconnected, with the economic freedom to access safe and stable housing options often meaning the freedom to leave abuse. The housing crisis has also made finding new, affordable housing for women and gender non-conforming folks fleeing violence impossible - and creates conditions where it's more feasible to stay in abusive relationships. As the National Women's Housing and Homelessness feminist housing agenda states, the primary reason women stay in abusive situations is the lack of safe and secure housing with 1 in 5 women leaving domestic violence shelters returning to live with their abuser. Statistics Canada data from 2019 further corroborates this, indicating that few women transition from shelters into safe or affordable housing, with 21% reporting they are returning to a residence where their abuser continues to live. The experiences of women with disabilities experiencing gender-based violence is uniquely connected to spousal clawbacks or restrictions on relationships when receiving persons with disabilities assistance. Research shows that women and gender-diverse people on social assistance like PWD and other disability supports can be trapped in abusive relationships due to an increased reliance on the person abusing them due to reduced service provision, loss of employment or income, or health benefits.

From 2007 data, we further correlate that homelessness and precarious housing put women at greater risk of gender-based violence, with 37% of the homeless women interviewed reporting being physically assaulted in the past year and 91% reported being sexually assaulted in their lifetime. In Project Inclusion, authors Darcie Bennett and DJ Larkin describe how anti-poverty stigma and criminalisation of poverty that fuel the belief that people experiencing homelessness are dangerous threats to society actually erases and silences the experience of sexual violence and gendered violence against people who are homeless. A 2004 study found that homeless women between the ages of 18-44 have a 10 times higher mortality rate than women the same age that had safe housing. Not only the data, but the dates these studies understand violence experienced by homeless women occurred, paint a bleak picture - the kinds of violence women and gender-diverse people face because of lack of access to housing cannot continue to be marginalised in data, policy, and housing plans. It is clear If we are to address the pandemic of gender-based violence, particularly against Indigenous women, girls, and two-spirit peoples, we must consider housing to be a key solution.

Hidden homelessness

At the onset of this section, we must point out that data around hidden homelessness is very flawed due to the nature of hidden homelessness itself. According to the Canadian Definition of Homelessness, people experiencing hidden homelessness fall under the category of being provisionally accommodated and refers specifically to people who live “temporarily with others but without guarantee of continued residency or immediate prospects for accessing permanent housing.” This includes people staying with relatives, friends, neighbours, or strangers because they have no other option. This population is considered to be hidden because they usually do not access homeless supports and services even though they do not

have secure or sustainable housing. However, we draw attention to hidden homelessness here, as the most recently available data (flawed thought it may be) suggests that women in B.C. account for 25 percent of hidden homelessness. Queer people, including trans women and folks of marginalized genders, also are more likely to be in hidden homelessness while fleeing family violence related to their identities.

Other data sets or studies on hidden homelessness paint a picture of who experiences hidden homelessness:

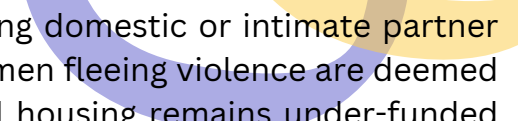
- In a 2006 study, it was found that Immigrant and refugee women overall may not access the shelter system for a number of reasons and are therefore, were more likely to experience hidden homelessness and overcrowding.
- The Statistics Canada (2016) study on hidden homelessness found that Canadians with a disability are more likely to experience hidden homelessness, and that those who reported at least three disabilities were four times more likely to have experienced hidden homelessness (26%).
 - Women with disabilities face even more barriers to accessing support and services, including a lack of fully accessible shelters. This may lead to disabled women experiencing hidden homelessness.
- The Statistics Canada (2016) study on hidden homelessness found that 15% of LGBTQ2S individuals report having experienced hidden homelessness.

Hidden homelessness hides the real scale of women's homelessness in Canada. Although taking action on building more affordable, accessible, and adequate housing would surely impact the rates of hidden homelessness is preferable, having more data on who experiences hidden homelessness would ensure the actions we take are not continuing to leave people under housed. Our current approaches to measurement have not captured the scale of women's homelessness, how chronic women's homelessness is, and how women move in and out of homelessness.

Hidden homelessness foundationally does not allow for the realisation of access to adequate housing, as those experiencing hidden homelessness have few rights and protections as tenants. Adequacy of housing is defined by the minimum conditions that need to be present for housing to be considered adequate including: security of tenure, habitability, accessibility, or location which are impossible when individuals are involved in hidden homelessness.

Lack of accessible, multi-stage transitional housing

The lack of housing for women and families fleeing violence is a systemic failure - a predictable failure that can be mitigated by providing units that are relevant to need and must include consideration of housing needs for women and families experiencing gender-based and intimate partner violence, street-based homelessness, and/or are under-sheltered.



Transitional housing is often thought of in terms of women leaving domestic or intimate partner violence. This form of housing has significant social license as women fleeing violence are deemed to be “deserving” of social support - yet, multi-stage transitional housing remains under-funded and under-resourced. The most recent data available from Statistics Canada shows that, on average, on a given night in Canada, 3,491 women and their 2,724 children sleep in shelters because of relationship safety concerns. Unfortunately, these numbers do not capture the even more difficult reality that many women and children fleeing violence are turned away from emergency shelter options. Recent internal measurement done by Ishtar Women’s Resource Society in Langley over a six-month period showed that nearly 700 women and children reached out for shelter and were not able to be housed due to lack of space.

When we expand the thinking of transitional housing to women and gender-diverse people who are already experiencing street-based or hidden homelessness due to violence, the numbers are even more staggering. Despite the profound violence and trauma that women and their children face on the streets each day, many are turned away from domestic violence and homelessness shelters due to capacity issues. Many of the women experiencing homelessness (point-in-time counts across BC document between 27-47% of homeless people are women) have been made homeless through lack of affordable or accessible housing options when fleeing violence. The Women’s National Homelessness and Housing Network statement notes that in Canada, over 60% of women experiencing homelessness report that violence was a driving force behind their loss of housing.

Transitional housing is also often ill-equipped to support women and gender-diverse people with complex needs or disabilities due to lack of universal design in shelter or multi-stage transitional housing or under-resourcing. For sex workers, trans people, people with children, elderly people, people with health conditions, pets, or who have belongings with them, access to appropriate shelter spaces is extremely limited and nowhere near able to meet the need. People also have to choose between having their belongings thrown out or a place to crash for a night or two - and often have impossible choices when put into such scarcity conditions in shelter spaces. Safety for women and gender non conforming, or trans people in shelters is often limited or non-existent.

Support for women experiencing and/or fleeing violence must also include housing beyond emergency shelters. Though these units are desperately needed, without the multi-stage supportive housing behind accessing immediate, emergency shelters, many women and gender-diverse people will be forced back into street-based or hidden homelessness.

Violation of the Right to Adequate Housing

Gender based violence is deeply linked to housing unaffordability, and staggering numbers of women return to violent partners because of a lack of housing affordability. More transition homes for women, girls, and gender-nonconforming people are also needed. Lived experience experts also offer analysis that proving your income for housing creates barriers , often forcing

people to disclose private information that could put them at risk. The issue of *affordability to whom* comes up often as well, with the current “affordability” rates set well above what many low-income women can truly afford sustainably. Additionally, there are not established, agreed-upon affordability measure standards across Canada, which makes it even harder to measure the impacts of the housing crisis on different communities.

Poverty is inherently a violation of human rights that intersects deeply with the violation of the right to housing for women and gender-diverse peoples. We see a significant gap between the legal, existing human rights that protect individuals in BC and the material realities that women and gender-diverse people face. As noted by the BC Human Rights Commissioner in the *Rights in Focus* report:

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“Under international law, economic rights—like the right to an adequate standard of living, the right to housing and the right to the highest attainable standard of health—are protected. These protections are detailed in the United Nations International Covenant on Economic, Social and Cultural Rights (ICESCR), which Canada ratified in 1976 with the support of all provinces and territories. The ICESCR requires the progressive realization of these rights to the maximum of available resources. This means that governments have an obligation to take appropriate steps towards the full realization of these rights.”

Our income security system at the Federal and Provincial levels should be seen as one of the largest housing programs for lower-income people. Unfortunately, it is largely ignored in today’s housing policy debate. Addressing the right to economic justice and the right to housing for women and gender-diverse peoples must be actioned simultaneously through systemic remedies we outline later in this submission.

Furthermore, the realities of hidden homelessness foundationally do not allow for realisation of the right to adequate housing given its inherent precarity. Women and gender-diverse peoples experiencing hidden homelessness have few rights and protections as tenants and adequacy of housing as defined by the minimum conditions that need to be present for housing to be considered adequate including: security of tenure, habitability, accessibility, or location.



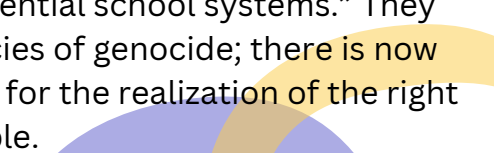
State Responsibility and Government's Role

All levels of government are already at play, and need to be further involved in fixing these interwoven crises. According to both international and federal law, the Federal Government should be utilising the maximum amount of its available resources to address housing, as is laid out in the definition of progressive realisation of the right to housing. This includes:

- providing funds for housing projects that meet the needs of women and gender-diverse people;
- application of a IGBA+ analysis in funding and other forms of housing initiatives;
- coordination of housing as a human right legislation to be enacted in each province to ensure a country-wide human-rights response to the housing crisis;
- coordination with First Nations, Metis, and Inuit governments and coordination to improve access to adequate housing on- and off-reserve;
- developing framework for building government social housing on stolen Indigenous lands that benefit Indigenous peoples;
- enshrining housing as a human right in the Canadian Human Rights Act; and
- enshrining social condition as a protected ground in the Canadian Human Rights Act.

Indigenous experiences of homelessness and housing insecurity are directly connected to historical and ongoing colonialism. This includes the Governments of Canada and BC managing Indigenous homes and families through the creation of reserves and the pass system, the Indian Act, and child apprehension that undermine Indigenous relationships to territory, law, and governance. The deep impacts and harm of colonialism cannot be overstated in the housing crisis. This means that homelessness and colonialism must be addressed alongside one another.

In contrast with a common colonial understanding of the term, the Community Housing Transformation Centre notes that “Indigenous homelessness is tied not only to the housing market and limited availability of affordable housing, but is also a direct result of hundreds of years of constant, deliberate destruction of Indigenous culture, linguistic heritage, and autonomy.” This means that **homelessness is not just a lack of roof over one’s head but a dispossession from healthy relationships with community, culture, land, and spirituality**. Katljà (Catherine) Lafferty recongises that it is not just homelessness, but inadequate housing that contributes to a “slow genocide” due to the long-term health impacts of mould, lack of proper heating and cooling, and the high cost of energy that are ultimately deadly. This is coupled with the mental and physical health impacts of extractive resource projects that are often close to Indigenous housing, whether on or off reserve. As articulated by the National Indigenous Feminist Housing Working Group in their housing claim, the lack of safe, accessible, adequate, and stable housing plays a significant role in “disrupting transmission and practice of cultures and our ways of doing, in tearing away our families from their place and power makes housing in Canada a legacy of the genocidal violence of the residential school systems.” They go on to assert that rather than continuing to contribute to legacies of genocide; there is now an opportunity to advance self-determination as a starting point for the realization of the right to housing for Indigenous women, girls, and gender-diverse people.



The decline in Federal funding for social housing beginning in the 1990's is well-documented. Facing big deficits and with neoliberalism taking hold globally, Ottawa reduced spending on housing, cut the federal co-operative housing program - one that saw the construction of nearly 60,000 homes - and eventually pulled the plug on building any new affordable housing units altogether. This lack of investment in social housing disproportionately impacts women and women-led households, who are more likely than men to work in minimum-wage and part-time jobs, suffer from chronic poverty, and take care of children in single-parent households, and cannot afford market rates for housing or are forced into unsafe or inadequate housing.

Remedies and Solutions

As Canada has systemically and systematically failed to ensure women and gender-diverse people have access to safe, adequate, and dignified housing, the remedies must also be systematic.

Foundational to all housing policy at all levels of government must be a **meaningful** application of Gender-based Analysis and an Indigenous Gender-based Analysis, which is detailed in *Rights-based GBA Analysis of the National Housing Strategy* submitted by the Women's National Housing and Homelessness Network.

Another remedy is providing more opportunities like this for people with lived and living experiences of homelessness and housing precarity. The right to participate in housing decisions is an important action that can be taken immediately in the creation of housing strategies. As described by the UN Special Rapporteur on the Right to Adequate Housing, Leilani Farha reported for the Thirty-Seventh Session of the UN Human Rights Council that a significant and ongoing step in rights-based housing strategies is a commitment to “ensuring meaningful participation of affected persons at every stage, from design to implementation to monitoring. Participation is central to human rights-based housing strategies because it challenges exclusion and silencing” present in the current market-reliant approach to housing.

Reinvesting in Canada's social housing network across the housing spectrum is a vital remedy for addressing the current housing crisis and its dire impact on women, gender-diverse peoples, and women-led households. Here we call not just for status quo investment, but aggressive intervention into a market response to the financialization of housing through social housing along the spectrum of housing needs, including supportive housing, multi-stage transitional housing, co-operative housing, and rent-geared-to-income units.



RECOMMENDATIONS

The BC Poverty Reduction Coalition seeks implementation of the following 11 recommendations for the Federal Government and consideration by the Neha Review Panel.

- That the Federal Government ensures the affordability metrics employed in all National Housing Strategy programs and funding actually reflect the depth of poverty and core housing need that many women, girls, and gender diverse people experience in Canada.
- The Government of Canada should revise the NHS affordability metrics in line with human rights standards, seeking to ensure that investment and prioritization reflect the depth of poverty and core housing needs that many women, girls, and gender-diverse people experience.
- That the Federal Government tracks the impact of financial investments in federal housing and homelessness programs on women, girls and gender-diverse peoples in partnership with lived experts, key stakeholders, and scholars. This will address the Auditor General's recent evaluation of the National Housing Strategy and Reaching Home, which revealed that although a GBA+ analysis was considered in the design of both programs, neither the Canada Mortgage and Housing Corporation nor Employment and Social Development Canada collected disaggregated data to assess the impact by gender or by other identity demographics.
- The Federal Government must renew the Women and Children's Shelter and Transitional Housing Initiative.
- The Federal Government must expand the Women and Children's Shelter and Transitional Housing Initiative to include permanent affordable housing for women, gender diverse people and their families;
- Build or protect a continuum of affordable/shelter-rate, non-market housing that offers a flexible range of supports and respects the choice and autonomy of residents to transition into safe, permanent housing.
- That the Federal Government creates and protects initiatives or programs that ensure economic empowerment as a pathway specifically built for LGBTQ2S youth to break free from cycles of poverty and chronic homelessness, including a targeted LGBTQ2S youth employment program through Canada Summer Jobs that provides a living wage.
- That the Federal Government must increase the amount of the Canada Disability Benefit to a rate that ensures people with disabilities in each province have income that at least meets the poverty line to provide economic freedom and improve access to adequate housing.
- That the Federal Government and CMHC create long-term housing solutions in which women and gender-diverse people are in charge of the lease and have agency over their own housing conditions. An example of this is the Budzey program through Rain City which provides housing specifically for women-led families.
- That the Federal Government have a targeted basic income program specifically designed for women and gender-diverse people leaving domestic or intimate partner violence. This provides women more security, safety, and agency in leaving violent situations. A detailed submission for this was submitted to the Government by the Case for Basic Income for Women in 2020.

- That the Federal Government take action to ensure First Nations, Metis, and Inuit families have the resources they need to keep children out of the family policing system by addressing root causes of poverty and homelessness, including:
 - Improving adequacy of housing for Indigenous communities and the amount of housing both on and off-reserve through targeted building or renovation programs.
 - Working with provincial governments to create a program for people moving off-reserve to address payment lag periods.
 - Creating and/or improving meaningful income supports for Indigenous families to ensure children are not removed from families due to reasons of poverty.
 - Enacting the remaining TRC and MMIWG Inquiry calls to action with urgency. The Yellowhead Institute has noted that 2023 marked eight years since the release of the Truth and Reconciliation Commission's 94 Calls to Action. This year also marks the sixth year of authors Eva Jewell and Ian Mosby tracking Canada's progress on completing the Truth and Reconciliation Commission's 94 Calls to Action.
 - Creating and/or promoting accessible federal mechanisms for Indigenous peoples to receive land back from landholders to ensure Indigenous peoples are regaining and retaining their sovereignty over their territories.
- Research and lived experience consistently show that the private market on its own will not provide affordable and safe housing for those facing the worst expressions of the housing crisis - especially if they are women or gender-diverse, Indigenous, racialized, have a disability, or are single parents. This means that the government must re-invest fully in social housing across the spectrum of housing needs across the country - a system that has been gradually degraded since the 1990s.

The BC Poverty Reduction Coalition seeks implementation of the following 11 recommendations for Provincial and Municipal Governments and consideration by the Neha Review Panel. All levels of government must be involved and have a role in ensuring access to appropriate, safe, adequate, and affordable housing. They need to be accountable to ensure the right to housing is enacted for everyone who calls Canada home. Therefore, we call for:

- That each province, with coordination and support from the Federal Government, should create and implement a province-wide housing public investment plan that aligns with the housing as a human rights principle and legislation and includes an Indigenous, Gender-based Analysis perspective.
- That municipal and regional government bodies remove exclusionary zoning and red tape for new affordable housing, stop street sweeps and encampment dismantling efforts, and provide a suite of local non-profit housing options, engage appropriately and meaningfully with people with lived experiences in local decision-making.

- The provincial governments must also increase assistance and social security rates to ensure shelter needs can be met in the current market conditions. This includes trying rates to account for market fluctuations and inflation so that affordable housing is achievable for those on assistance programs.
- That provinces invest in robust, dignified social supports that enable women and families to live safely, such as appropriate, accessible and affordable childcare and meaningful wage equity legislation.

One of the BC PRC members, Ishtar Women’s Resource Centre heard a lot about housing during consultations for addressing poverty in BC. We quote at length and directly from their submission to the update to the BC Poverty Reduction Strategy:

Participants unequivocally recommended that the most significant need to reduce or eliminate poverty is affordable housing. Women shared a range of ideas to make housing more affordable and tailored to their own unique needs as survivors of violence—emphasizing a flexible continuum model ranging from immediate and short-term shelters (such as transition houses and shelters specifically for women and children), container/pod and SRO housing, second-stage housing for women, longer-term supportive housing for those with mental and physical wellness challenges, rent-geared to income rental units throughout the community, and cooperative housing development for permanent occupancy.

Women recommended that the prioritization for BC housing placements following leaving abuse are not fast enough, and that women should have the option to be placed in market rentals in the community immediately with a rental supplement that is equivalent to the investment for a BC housing complex unit.

Women reported that, while temporary housing that is grouped together (i.e. all units devoted to residents of a similar socio-economic background, or solely for survivors of violence) may be necessary and useful in rapid responses to poverty and violence, that they believe that increased autonomy and diversity in their housing choices over time is most beneficial to ending the cycle of poverty, and increasing a sense of belonging in the community for themselves and for their children. Members shared freedom and flexibility to accommodate children and animals, and to offer exposure to the richness of diversity in society as important guiding values in housing policy. Women supported the idea of mixed-model development communities with some units designated for rent-geared to income, or survivors of violence, and other units for those of different backgrounds/market rate rentals.

Conclusion

The BC Poverty Reduction Coalition respectfully requests the National Housing Council to consider the arguments and evidence presented in this submission and to take appropriate action to protect and promote the right to adequate housing for all women and gender-diverse people in Canada.

Chantelle Spicer
Campaign Manager, BC Poverty Reduction Coalition