

The right to housing for women, Two Spirit, Trans, and gender-diverse people

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About the Canadian Centre for Housing Rights (CCHR)

The Canadian Centre for Housing Rights (CCHR) is Canada's leading non-profit organization working to advance the right to housing. Founded in 1987, CCHR has worked tirelessly for over 35 years at the intersection of human rights and housing. We advance the right to housing by serving renters to help them stay housed, providing education and training about housing rights, and advancing rights-based housing policy through research, policy development, advocacy and law reform.

Since the end of the COVID-19 pandemic, more and more Canadians are feeling the impacts of the housing crisis and the sharp rise in the cost of living.¹ Women, Two-Spirit, trans and gender-diverse people are at the forefront of the escalation of the housing crisis and experience disproportionate levels of housing insecurity compared to the rest of the population.

The *Pan-Canadian Women's Housing and Homelessness Survey*² reveals that more women-led households are in core housing need compared to men-led households, and the majority of renter households in core housing need are women-led households. Housing needs are heightened for women whose identity intersects with that of other marginalized groups. For instance, single mothers are more likely to be in core housing need than any other family type, especially if they are also Indigenous.³

Systemic inequalities historically faced by women and other marginalized groups have been exacerbated by a severe shortage of affordable housing. Ever-increasing rents and a steady loss of existing affordable units⁴ create excessive pressure on affordable housing demand and generate unfair competition for available units. Factors such as poverty, gender-based discrimination, racial discrimination, ableism, and domestic violence further prevent women and gender-diverse people from accessing and maintaining adequate housing in a financialized housing market, usually leading to experiences of homelessness.

Impact of intersectional factors on housing security

1. Economic inequality

Women experience historic and ongoing disparities in labour force participation, lower income levels, and higher incidences of poverty. Racialized women and Indigenous women in particular experience the deepest forms of poverty⁵ and their economic vulnerability means that their housing search is limited to low-cost and inadequate housing.

This is especially true for victims and survivors of domestic violence who are either financially dependent on the abuser or earn significantly lower incomes. High rents, moving costs, costs related to relocation (such as longer commutes to work/daycare, furnishing, urgent repairs etc.) and limited savings mean that they often have to choose between paying the rent and utilities or

buying food and other basic necessities.⁶ Consequently, they are more likely to remain in or return to an abusive home for lack of suitable alternatives they can afford for themselves and/or their dependents.⁷ Our research on the impact of gender-based violence on housing security in Ontario⁸ shows that survivors with children have extremely limited affordable housing options that can accommodate their needs and those of their children (e.g. sufficient living space, proximity to childcare services, affordable to a single parent family). Similarly, survivors with a disability are likely to remain in an abusive home owing to a lack of affordable housing options and support services that meet their accessibility needs.

2. Discrimination

The economic marginalization of women and gender-diverse people is compounded by the many forms of discrimination they face in the housing sector. Research shows that 80 per cent of women and gender-diverse people experience one or more forms of discrimination from landlords and property managers, and nearly 16 per cent are forced to move out as a result of discrimination and/or harassment.⁹

For years, renters receiving legal services from the Canadian Centre for Housing Rights (CCHR) have reported experiencing discrimination in the housing market. Our recent national study on discrimination in rental housing¹⁰ found that lower income households, people receiving social assistance, women, Indigenous people, racialized people, immigrants, and people with disabilities experience a high degree of discrimination and face critical barriers in accessing housing and maintaining housing security. People from historically marginalized groups are asked for extensive documentation in their rental housing application, receive less communications from landlords if they disclose their ethnic or racial identity, and are generally expected to follow stricter rules than other groups. Other studies highlight that single mothers, especially Indigenous women, face the most discrimination when searching for rental housing.¹¹

If and when they are able to secure housing, women and gender-diverse people who are Indigenous, racialized, immigrants, live with a disability or have children often experience harassment, physical or sexual violence from landlords in the private rental market.¹² As demand for market housing grows, so does discrimination in housing.¹³ As a result, women and gender-diverse people struggle to find housing that meets their needs and are forced to live in unsafe and hostile environments.

3. Domestic violence

Instances of police-reported intimate partner violence (IPV) and other forms of domestic violence have steadily increased since 2014, and have risen more sharply since the onset of the COVID-19 pandemic.¹⁴ Nearly half of Canadian women have experienced some form of domestic violence in their lifetime.¹⁵ Indigenous women, Two-Spirit, trans and gender-diverse people, and women with disabilities are the most impacted by domestic violence, with nearly 60 per cent of people from these groups having experienced IPV.¹⁶

Housing security is paramount to the safety of survivors of domestic violence. Survivors are most at risk of being killed by the person abusing them when they attempt to leave the relationship, and it takes on average seven attempts for survivors to permanently leave an abusive partner.¹⁷ However, high housing costs act as a barrier to survivor's ability to find a safe home. In addition, survivors face discrimination in the housing market because of their trauma, further complicating their efforts to escape abuse.¹⁸ For example, landlords discriminate against survivors for fear of damage to property by the abuser, or because of a lack of leasing history or previous landlord references.¹⁹ For survivors, escaping abuse often means losing their home without a safe place to land. As a result, a staggering 75 per cent of women and gender-diverse people experiencing homelessness identify as survivors of domestic violence. Women with disabilities are especially more likely than any other groups to experience homelessness because of domestic violence.²⁰

4. COVID-19 pandemic

Women and gender-diverse people's housing security has been heavily compromised by the economic and social impacts of the COVID-19 pandemic. Women are more likely to hold part-time or minimum wage jobs that were negatively impacted during the pandemic.²¹ More than 20,000 women lost their jobs in 2020, representing 63 per cent of all job losses.²² At the same time, housing prices and rents have skyrocketed, and social supports have become insufficient to protect women and gender-diverse people from being evicted due to rent arrears.²³ In addition, decreasing vacancy rates in the private rental market and lower turnover in social housing have left economically vulnerable women with fewer housing options than prior to the pandemic.²⁴

The incidence and severity of domestic violence also increased during the pandemic²⁵, owing to stay-at-home orders and other restrictions which forced women and gender-diverse people to remain in violent environments and disconnected from social supports.²⁶ While the need for transitional housing and emergency shelter has spiked due to the rise in domestic violence²⁷, shelter capacity was reduced to comply with social distancing requirements. As a result, women and gender-diverse people faced acute economic and housing precarity leading to experiences of various forms of homelessness.

Gendered experiences of homelessness

It is estimated that homelessness affects 235,000 Canadians, of which 150,000 are shelter users.²⁸ Because homelessness counts focus on visible homelessness experienced mainly by single men, other forms of homelessness experienced largely by women and gender-diverse people are rarely accounted for. Women and gender-diverse people are less likely to rely on shelter services, due to a variety of factors.²⁹ Therefore, gendered experiences of homelessness are often the result of situations of relative homelessness³⁰, whereby a person lives in housing that is unsafe, inadequate or insecure.

1. Hidden homelessness

About 70 per cent of women and gender-diverse people in Canada have experienced relative homelessness.³¹ Indigenous women in particular are more likely to live in overcrowded homes or in homes in need of extensive maintenance and repairs.³² In addition, many women and gender-diverse people live in situations of hidden homelessness, which include couchsurfing with relatives, friends or strangers, using short-term rentals and motels, living in their cars or engaging in survival sex to secure temporary housing.³³ While it might provide a roof for a time, hidden homelessness puts women and gender-diverse people in precarious situations, in which they are constrained to deplete their financial and social resources on housing, and their housing security is entirely dependent on the relationship with those offering accommodation.

Survivors of domestic violence are more likely to experience hidden homelessness³⁴, and research found that over 40 per cent of survivors experienced hidden homelessness as a result of domestic violence.³⁵ Those who can't rely on informal supports are pushed faster into homelessness and the shelter system. In addition to the threat of homelessness, survivors' mental and physical health is aggravated by the stress and fear they experience as a result of domestic violence. Declining mental health can be accompanied by substance use as a coping mechanism, and for women who are forced to stay in an abusive home, this puts them at a greater risk of being evicted, being denied income supports or losing the custody of their children.³⁶ At the time they leave an abusive home, survivors are the most vulnerable socially and financially, and literature shows that there aren't enough social supports to ensure that they have a safety net that can help them secure safe and adequate housing and avoid being forced into situations of homelessness.

2. Visible homelessness

Situations of relative homelessness eventually threaten women and gender-diverse people's health and safety, while leaving them disconnected from the social and institutional supports they need to access permanent housing. Many are eventually propelled into situations of visible homelessness, with single mothers³⁷, Indigenous women³⁸ and women with disabilities³⁹ being more likely to experience street-level homelessness or living in emergency shelters.

However, the shelter system is not adequately equipped to support women and gender-diverse people. A severe lack of capacity restricts the ability of women and gender-diverse people to access shelters that meet their needs, pushing many into street-level homelessness where they experience high levels of discrimination and violence. Across Canada, there are very few gender-specific shelters and family shelters that can accommodate women and gender-diverse people, with some jurisdictions having no women's shelters at all.⁴⁰ Moreover, chronic underfunding of Violence Against Women (VAW) shelters and longer durations of stay have resulted in lower turnover and an increase in denial of services, with close to 1,000 women and children being turned away from VAW shelters on any given day.⁴¹ Because the VAW and homelessness sectors operate in siloed ways with little coordination between the two, women

and gender-diverse people who have experience of homelessness and domestic violence are often poorly served by both sectors, and have to resort to sleeping rough.⁴²

3. Lack of safe, accessible and culturally appropriate shelter services

Access to shelter beds is not the only issue. Several factors can perpetuate women and gender-diverse people's experiences of homelessness, particularly for survivors of domestic violence, Indigenous women, Two-Spirit and trans people, and women with disabilities.

The vast majority of women experiencing homelessness in remote communities are Indigenous women⁴³, who face geographical barriers to accessing shelter services. A lack of affordable transit options coupled with a lack of shelters in rural areas mean that Indigenous women often have to move to more serviced urban areas and end up being displaced from their community.⁴⁴

In addition, women and gender-diverse people can face discrimination and violence within shelters.⁴⁵ The majority of emergency shelters in Canada are men's and co-ed shelters, with few women-specific shelters and only a handful of shelters serving members of the 2SLGBTQIA+ community. Two-Spirit, trans and gender-diverse people often have to rely on shelter services that cannot accommodate their needs and where gender-based discrimination and violence are rampant. A study of Toronto's shelter services found that gender-diverse people experienced heightened surveillance, bullying, harassment, service restrictions, sexual assaults, property theft and police intervention compared to gender-conforming shelter users, especially if they are racialized.⁴⁶ Fear of gender-based violence and discrimination is also a key barrier for survivors of domestic violence. Women fleeing domestic violence are often stigmatized and abused while in the shelter system, and frequently threatened and assaulted when they sleep rough.⁴⁷

Women and gender-diverse people who are Indigenous or racialized are disproportionately impacted by racial discrimination and face a crucial lack of culturally adequate services that could help them feel safer within emergency shelters and gain the supports they need to exit homelessness, such as language-specific services and culturally competent shelter staff.⁴⁸

Women and gender-diverse people with disabilities lack access to shelters that meet their accessibility needs. While 75 per cent of homeless shelters have a wheelchair accessible entrance, only 66 per cent also provide wheelchair accessible rooms inside, and a marginal proportion offer services accessible to the deaf and blind.⁴⁹ For those who can access the shelter system, women and gender-diverse people with disabilities face increased surveillance, disciplinary action, discrimination, and violence, particularly if they are also Black, Indigenous, racialized, Two-Spirit or trans.⁵⁰

4. Lack of trauma-informed and low-barrier services

Adverse experiences of sheltered and unsheltered homelessness create negative health outcomes for women and gender-diverse people, and restrictive shelter policies can exacerbate

their health issues, including trauma, mental health issues and substance use issues. High-barriers to shelter access negatively impact survivors of domestic violence in particular, as they are more likely to develop health issues related to brain injuries⁵¹, post-traumatic stress disorder (PTSD)⁵² and other acquired disabilities. The administrative processes and paperwork, references and documentation needed to access shelter and housing services can be overwhelming for people dealing with mental health issues.⁵³ The stress of finding safe housing and shelter, combined with the trauma stemming from experiencing abuse mean that many survivors are unable to access or process health and/or mental health services.⁵⁴

Survivors of domestic violence and women and gender-diverse people in situations of homelessness often turn to substance use to cope with the stress of their situations.⁵⁵ They are also more likely to be mis-diagnosed and prescribed medication for mood disorders, which alters their vigilance and makes them more vulnerable to experiencing violence, either in the home or while homeless.⁵⁶ In addition, these types of medication can create addictions and may have harmful side effects if the user goes into rapid withdrawal. Nevertheless, substance users are often turned away or evicted from emergency shelters and transitional housing programs that require sobriety for admission. Those who try to comply may experience severe withdrawal symptoms, putting their health and life at risk.⁵⁷

Women who are pregnant or raising children in or away from an abusive home also have to deal with harmful stereotypes about motherhood. While they may be viewed more sympathetically due to their status as a mother, they might be stigmatized for failing to leave an abusive home and endangering their children, sometimes being presumed to be an abuser themselves. This is especially true for survivors of domestic violence who try to cope through substance use. Mental health issues and substance use are perceived as a choice, and not as a result of the trauma victims of domestic violence experience. This frequently leads service providers in the housing, shelter and VAW sectors to view these women as “bad mothers” and either deny them access to their services, or focus on the needs of the children at the expense of the mother.⁵⁸

5. Restrictive pathways out of homelessness

In many cases, women and gender-diverse people who face discrimination and violence in emergency shelters, or face service restrictions due to abstinence-based policies, have nowhere to go when exiting the shelter system.⁵⁹ Securing housing in the private market is rarely an option due to high housing costs and it takes years to access subsidized housing. Institutional pathways out of homelessness generally follow a staircase model along the housing continuum⁶⁰, whereby shelter users are expected to move through the shelter system and transitional housing long enough to be considered “house-ready,” and be eligible to access social or community housing. Even when housing options are available, factors such as program eligibility, wait times, accessibility of services and disability accommodations limit the options that can meet the needs of women and gender-diverse people.

There are very few gender-specific, low-barrier and harm reduction-focused supportive housing programs accessible to women and gender diverse people.⁶¹ As a result, many women and

gender-diverse people who leave the shelter system experience successive cycles of visible and hidden homelessness before they can secure stable housing.⁶² For survivors of domestic violence, this often means returning to an abusive home.⁶³ A 2007 study of Canadian shelters found that 31 per cent of women who accessed shelters would return to an abusive home for lack of other housing options.⁶⁴ Our research in Ontario indicates that 65 per cent of survivors experienced housing insecurity after leaving an emergency shelter. Only 10 per cent of survivors were able to find housing in the private market, while 24 per cent were able to access transitional housing, and none were able to access social housing.

Canada's duty to uphold the right to housing of women and gender-diverse people

The right to adequate housing is recognized under international and Canadian law. First enshrined in Article 25 of the Universal Declaration of Human Rights (UDHR)⁶⁵, the right to adequate housing is protected under Article 11.1 of the International Covenant on Economic, Social and Cultural Rights (ICESCR)⁶⁶, which states that everyone has the right to an adequate standard of living, including housing.

The right to adequate housing ensures that every person has a right to a home where they can live in security, peace and dignity. To provide liveable conditions, housing must meet certain minimum standards: it should be affordable, provide secure tenure, be well-maintained, accessible, close to jobs and services, connected to transit, roads and utilities and should allow the expression of cultural identity.⁶⁷

1. Canada's human rights obligations under international law

Canada recognized the right to adequate housing when it signed the UDHR in 1948 and the ICESCR in 1976. Canada therefore has an obligation to respect, protect and fulfill the right to housing for everyone.⁶⁸ In its General Comment No. 4, the United Nations Committee on Economic, Social and Cultural Rights (CESCR)⁶⁹ states that housing should not be viewed as a commodity and should “not be subject to any form of discrimination.” The Committee stresses that “the right to housing should be ensured to all persons irrespective of income or access to economic resources.”

The right to housing for women and gender-diverse people is reinforced in other international covenants ratified by Canada:

- Article 3 of the United Nations Declaration on the Elimination of Violence Against Women⁷⁰ affirms that women are entitled to the “equal enjoyment and protection of all human rights and fundamental freedoms,” including the rights to life, liberty, security of person, and freedom from all forms of discrimination.

- The Convention for the Elimination of Discrimination Against Women (CEDAW)⁷¹ states that governments should guarantee women's enjoyment of human rights on an equal basis with men, including the enjoyment of adequate living conditions.
- The United Nations Committee on the Elimination of Discrimination Against Women's General Recommendation No. 33⁷² adds that governments should guarantee access to shelters and other social supports to women victims of gender-based violence.
- The International Convention on the Elimination of All Forms of Racial Discrimination (ICERD) guarantees the right to housing without distinction as to "race, colour, national or ethnic origin."
- The United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP)⁷³ says that Indigenous Peoples have the right, without discrimination, to the improvement of their economic and social conditions, including housing. It also affirms their right to make decisions about housing programs affecting them and to administer these programs through their own institutions.
- The Convention on the Rights of Persons with Disabilities (CRPD)⁷⁴ recognizes that people with disabilities have the right to an adequate standard of living, including housing, and should be protected against housing discrimination on the basis of disability. It states that people with disabilities are entitled to live independently in the community, and that governments must guarantee they have access to barrier-free housing, public housing programmes and community services to facilitate inclusion in the community.

This international law framework means that women and gender-diverse people should have access to safe, stable, affordable, accessible, culturally appropriate, well-located and well-serviced housing. The Canadian government does not have to build homes for the entire population, but it must ensure that measures to realize the right to housing give particular consideration to social groups living in unfavorable conditions, are swiftly implemented and use maximum available resources. This means that the government must prioritize funding housing programs directed at vulnerable and disadvantaged groups, most of whom are women, Two-Spirit, trans and gender-diverse people, Indigenous women, racialized women and women with disabilities.

2. Canada's federal commitments to advance the right to housing of women, Two-Spirit, trans and gender-diverse people

As a signatory to the ICESCR, CEDAW, ICERD, UNDRIP and the CRPD, Canada has a duty to uphold the right to housing of women and gender-diverse people. CESCR's General Comment 3 explains that governments must progressively realize the right to housing, including through the adoption of legislative measures.⁷⁵

In 2019, Canada fulfilled that obligation when it passed the National Housing Strategy Act (NHSA), the first piece of Canadian legislation that recognizes housing as a fundamental human right.⁷⁶ The NHSA requires the federal government to adopt a National Housing Strategy to support the progressive realization of the right to housing and improve housing outcomes for people in greatest need. Canada's National Housing Strategy (NHS) was launched two years prior to the adoption of the NHSA. Under the NHS, the federal government pledged \$115 billion over 10 years to invest in housing, with at least 25 per cent of funding directed towards meeting the housing needs of women and their children.⁷⁷

Additionally, all levels of government endorsed a Joint Declaration for a Canada Free of Gender-Based Violence in 2021, which laid the foundation for the launch of a National Action Plan to End Gender-Based Violence (NAP) in 2022. Budgets 2021 and 2022 committed around \$1.1 billion over five years for the implementation of the 10-year NAP, with almost half of the funding to support provinces and territories in advancing the objectives of the NAP according to their regional realities and priorities.⁷⁸ Some of the NAP's objectives support women and gender-diverse people's realization of their right to housing by protecting their human rights and providing them with the infrastructure, services and social supports they need to live free from violence, including housing and shelter.⁷⁹

In response to the 231 Calls for Justice⁸⁰ of the National Inquiry into Missing and Murdered Indigenous Women and Girls (MMIWG)⁸¹, all levels of government co-developed together with Indigenous governments and Indigenous communities the 2021 National Action Plan on Ending Violence Against Indigenous Women, Girls and 2SLGBTQQIA+ People.⁸² Through this Action Plan, the federal government pledged over \$700 million to create new shelters and transitional housing for First Nations, Inuit and Métis women and gender-diverse people facing gender-based violence.⁸³

Canada's failure to prevent and eliminate homelessness amongst women and gender-diverse people

Despite significant investments in housing, Canada has failed to meaningfully advance the right to housing of women and gender-diverse people. Since 2018, the proportion of people experiencing chronic homelessness has increased by 17.2 per cent⁸⁴ and a greater proportion of women and gender-diverse people are in core housing need⁸⁵ or in situations of homelessness.⁸⁶⁸⁷ Canada's efforts to mitigate the housing crisis have not been responsive to women and gender-diverse people's needs and there remain crucial funding, policy, legal and knowledge gaps that need to be addressed in order to meet housing needs of women and gender-diverse people.

1. Lack of investments in housing that prioritize women and gender-diverse people

As of 2024, over \$14 billion has been allocated under the NHS to build and repair homes for women and their children, representing 30 per cent of all funding commitments. However, these investments pale in comparison to the scale and scope of women and gender-diverse people's urgent and complex housing needs.

On the one hand, Canada's housing supply targets fail to consider the real supply gap for households in greatest need.⁸⁸ While the Canada Mortgage and Housing Corporation (CMHC) anticipates a housing shortage of 5.8 million homes by 2030⁸⁹, experts estimate that Canada's total supply gap will reach 9.6 million homes by 2031, with 4.3 million homes needed to house lower income households.⁹⁰ On the other hand, the housing supply created under the NHS is simply not affordable to households most in need. A report from the National Housing Council found that only three per cent of housing units created through the NHS's largest housing funding program were affordable to lower income households.⁹¹

Furthermore, the federal government has not set meaningful targets to measure housing outcomes of women and gender-diverse people. While investment targets towards women's housing have been exceeded, housing and homelessness prevention programs under the NHS do not reflect gendered experiences of housing insecurity and homelessness.⁹² Recent funding announcements under Canada's Housing Plan⁹³ do not include any investments in gender-responsive housing solutions and fail to set gender-sensitive goals, monitoring and evaluation methods that take into account the intersectional nature of women and gender-diverse people's housing needs.

2. Lack of funding for inclusive, trauma-informed services and supports

While shelters do not constitute adequate housing under international law, governments still have a duty to "provide alternative housing to persons who are left homeless as a result of eviction" and ensure that temporary accommodations protect people's dignity, meet all safety and security requirements and offer pathways towards obtaining adequate housing.⁹⁴

Through Canada's Homelessness Strategy, *Reaching Home*, the federal government has pledged to invest \$5 billion to reduce chronic homelessness by 50 per cent before 2028.⁹⁵ However, the definition and measures of chronic homelessness used in the strategy fail to consider the hidden and intersectional nature of homelessness as experienced by women and gender-diverse people. A 2022 report from the Auditor General of Canada found that the federal government did not know whether the strategy had improved housing outcomes for people in situations of homelessness at large and if homelessness had increased or decreased, let alone how women and gender-diverse people had benefitted from initiatives implemented under the strategy.⁹⁶

Moreover, systemic discrimination in emergency shelters has not been addressed by federal policies and programs, as evidenced by continued and unfair service restrictions, denial of

services, evictions, and lack of inclusively designed, culturally appropriate and trauma-informed shelter services for women and gender-diverse people.⁹⁷ As a result, survivors of domestic violence, women with disabilities and women struggling with mental health and/or substance use issues are often re-victimized and re-traumatized within the shelter system. Infrastructures of care⁹⁸, low-barrier access to support services, as well as financial assistance and direct pathways to transitional and social housing are key factors to exiting homelessness and regaining housing security.⁹⁹ Yet, Canada's social housing stock is aging and largely insufficient to meet the needs of a growing homeless population.¹⁰⁰ In addition, women and gender-diverse people exiting homelessness face administrative barriers when trying to access income supports or rental assistance (e.g. providing financial information, guarantors, proof of residence, etc.), and few provinces and territories have invested in supportive and transitional housing or offer financial assistance for housing stabilization.

3. Gaps in legal protections that lead to housing precarity

Human rights laws across the country lay out protections for renters. According to these laws, housing providers must ensure that they do not discriminate against renters based on sex, family status, marital status and other protected grounds. Women and gender-diverse people with intersecting identities and/or experience of domestic violence face disproportionate discrimination in housing, and are more at risk of being evicted on the basis of one or more protected grounds.¹⁰¹ There are mechanisms in place for women and gender-diverse people to claim discrimination under human rights legislation. Unfortunately, these human rights protections present several gaps. For example, the human rights legislation of many provinces and territories either does not provide or provides only limited protections to renters who share a kitchen and/or a bathroom, or otherwise live in close quarters with their housing provider.

Residential tenancies laws also lay out protections for renters that are important for women and gender-diverse people facing discrimination. These protections ensure that housing providers must intervene to stop situations of harassment (related to discrimination or otherwise) that happen in their building, and that housing providers respect their tenants' privacy (e.g. not entering their unit without sufficient notice). However, there are gaps in how these protections apply to renters across the country. For example, in many provinces and territories, these protections do not apply to certain types of housing (like residences at educational facilities, temporary living arrangements akin to hotels, shelters, supportive housing), in which people facing gender-based violence may be disproportionately likely to live.

Some residential tenancies laws across the country include specific protections for people facing gender-based violence. Many provinces and territories' residential tenancies laws explicitly give people facing gender-based violence the right to end their lease early. Most of these laws also stipulate that housing providers must keep information about the tenant's departure confidential. However, these protections are uneven across jurisdictions. Many provinces require extensive documentation to break a lease early, and not all jurisdictions allow renters facing gender-based violence to end their lease in a joint tenancy.

4. Lack of sectoral coordination and barriers to access to justice

Multi- sectoral coordination is critical to supporting women and gender-diverse people who are housing insecure or homeless, as they have intersecting needs that require them to connect with several agencies like social services, the justice system, law enforcement, or healthcare providers. Advocates have consistently identified the interrelations between gender-based violence, mental wellness and addictions, but the social agencies responsible for delivering these services have not adopted a holistic and trauma-informed approach to service delivery that would help reduce barriers to accessing social and legal supports.¹⁰² As a result of a lack of effective inter-agency coordination, women and gender-diverse people with experiences of homelessness and/or domestic violence often have limited access to legal information, appropriate legal representation and responsive social services.¹⁰³

Research shows that women and gender-diverse people also face discrimination when navigating the justice system, which leads to erosion of trust towards service providers and prevents them from seeking the supports they need.¹⁰⁴ For example, studies found that immigrant women who are homeless and survivors of domestic violence often do not receive enough information or support to access the legal protections they are entitled to and that they might not be aware of. When they bring forward issues of gender-based violence to shelter staff untrained in anti-racism, anti-oppressive approaches, they can face judgement, blame or gatekeeping of vital information.¹⁰⁵

For women and gender-diverse people who are able to receive legal information, slow approval processes to obtain legal aid, fatigue from receiving so many referrals, and insufficient follow-up to client enquiries add to the challenges of seeking legal protection and/or redress. Barriers to access to justice are particularly damaging for survivors of domestic violence with children. Reporting violence usually leads to interventions from family courts, child welfare agencies, the criminal justice system and social services, and requirements to maintain custody are often beyond their control (e.g. housing located near the children's schools).¹⁰⁶ Additionally, the apprehension of children by child welfare authorities may lead to a reduction or loss of social assistance, leading to homelessness.¹⁰⁷

5. Lack of recognition and understanding of the issue

Homelessness counts have traditionally underscored the prevalence of gendered experiences of homelessness and there is no systematic approach to enumerating and understanding hidden homelessness in Canada.¹⁰⁸ Typical Point in Time (PiT) counts and similar enumeration efforts focus on the most visible expressions of homelessness and housing precarity, usually experienced by men.¹⁰⁹ For example, VAW shelters are seldom included in PiT counts. There are also significant gaps in research on the intersection of gender-based violence and housing insecurity outside of major cities, as well as its differentiated impacts on women and gender-diverse people.¹¹⁰

Discrimination by landlords is a significant barrier to housing security.¹¹¹ Lack of understanding of gendered experiences of housing discrimination that underpin housing precarity means that legal protections, eviction prevention and housing stabilization policies and programs will continue to inadvertently exclude women and gender-diverse people, particularly those with intersecting identities. This can result in poor allocation of resources towards services and programs that aim to prevent women and gender-diverse people from experiencing housing precarity and homelessness.

In addition, definitions of violence vary across jurisdictions, and create service gaps in the VAW and emergency shelter sectors. Often, gender-diverse people who have experienced gender-based violence will not be considered on an equal footing with women fleeing domestic violence. A “hierarchy of deservingness” also exists amongst women who are survivors of domestic violence, as service providers tend to be more accommodating to women who have experienced violent victimization over women who have experienced other forms of abuse. Ultimately, a lack of gender-responsive definitions of homelessness and data collection methods make it difficult to accurately capture and enumerate women and gender-diverse people’s experiences¹¹², and therefore to assess the full scope of homelessness in Canada. It also creates challenges in tracking progress towards the elimination of homelessness amongst women and gender-diverse people.¹¹³

Towards a realized right to housing for women and gender-diverse people

Homelessness threatens the enjoyment of several fundamental human rights. For women and gender-diverse people, homelessness often overlaps with violations of other human rights, that are borne from discrimination and gender-based violence.¹¹⁴

A human rights-based, gender-sensitive and trauma-informed approach can address the root causes of women and gender-diverse people’s experiences of housing precarity, especially as they remain economically disempowered in a financialized housing market. As such, there is an urgent need to generate and/or scale up initiatives that provide gender-responsive housing and shelter options to women and gender-diverse people. This scaling imperative should be balanced with a parallel need to lift barriers preventing access to housing, social and legal services and supports before, during and after experiences of homelessness.¹¹⁵

1. Key principles and vision

Key principles for a rights-based, gender-sensitive and trauma-informed approach to homelessness are based on understanding the many realities of women and gender-diverse people who have experienced homelessness and/or gender-based violence. This translates into removing structural barriers to sustain and create affordable housing options that meet their needs, providing safe shelter spaces and compassionate services, and building consistent, coordinated supports until they can achieve housing stability.

- Upstream prevention of housing insecurity can be achieved through better protections and supports against housing loss while improving housing affordability at large. This means strengthening renter protections and human rights claim mechanisms, providing tailored rental assistance and income supports, and significantly increasing investments in social, non-market and Indigenous-led housing.
- This should be supported by an adequately funded and efficient shelter system that offers trauma-informed care, on-site harm reduction, health, childcare and community supports, as well as inclusive design of shelter spaces and services.
- Downstream interventions should focus on breaking the staircase model out of homelessness through low- or no-barrier access, culturally appropriate supports and tailored housing navigation services. This also requires increasing investments in supportive and transitional housing programs, including in remote and Northern communities.

Occurrences of homelessness often happen when women and gender-diverse people fall between the cracks as they move along the steps on the housing continuum. To bridge those gaps and ensure that women and gender-diverse people can easily transition from being housing-insecure to being safe at home, structural changes and additional funding are needed to improve service coordination and response between the housing, shelter, health, justice and child protection sectors.

2. Knowledge mobilization

Research informed by accurate data is key to developing evidence-based policies and programs. Good data allows housing stakeholders and decision-makers to better understand how effective homelessness prevention initiatives are, and deliver impactful services and programs. In 2023, Statistics Canada undertook a review of Canadian homelessness data to identify gaps in current collection methods.¹¹⁶ There have also been attempts to estimate hidden homelessness in British Columbia¹¹⁷ and to capture the experiences of Indigenous people facing this issue.¹¹⁸ More recently, researchers have developed prototypes to improve homelessness counts at the municipal level. Local data systems, alongside regular data collection with community service providers, emerge as ways of better understanding the housing barriers faced by women and gender-diverse people in situations of hidden homelessness.¹¹⁹

Additional research and evaluation of innovative models from shelter, social, supportive and transitional housing providers can help identify best practices that can be replicated and scaled up to prevent homelessness. For example, Safe at Home models and Housing First programs provide gender-responsive housing solutions upstream and downstream of homelessness. These models give women and gender-diverse people more choice in where they live, while providing them with the skills and supports to live independently. Several of these low-barrier programs have been successfully implemented in Europe, Australia, and the US, in combination

with wrap-around services, and have been able to effectively reduce chronic and cyclical homelessness amongst women and gender-diverse people.¹²⁰ In Canada, a few shelter and transitional housing providers across the country have been pioneering new ways of delivering and integrating their services, using inclusive design, trauma-informed and gender-responsive approaches. For example, the University Health Network recently inaugurated Canada's first social medicine housing initiative in Toronto, which provides integrated healthcare services to patients with complex medical and social needs, with priority given to women, Indigenous people and people with disabilities exiting homelessness.¹²¹

To better learn about and understand which interventions work or don't work in addressing homelessness amongst women and gender-diverse people, conscious and meaningful inclusion of lived experience is crucial to knowledge mobilization. It provides multi-faceted insights into gendered experiences of housing insecurity and/or homelessness, and can actively inform program evaluation, policy development and service design. Improving knowledge around hidden homelessness relies on gathering information from the people impacted and their informal networks, and lived experience offers invaluable data that is missing from conventional homelessness counts.¹²² Deep and sustained engagement is needed to avoid exploiting people with lived experience for data extraction and instead move towards co-creation of housing solutions that are responsive to their needs.¹²³

This is particularly important when it comes to the inclusion of Indigenous people with lived experience. Indigenous knowledge is critical to shaping human rights-based, trauma-informed and culturally appropriate housing solutions. Indigenous women, girls, Two-Spirit, and gender-diverse people are particularly overrepresented in experiences of housing precarity and homelessness.¹²⁴ They also possess inherent rights to self-determination and sovereignty and thus must be engaged meaningfully as rights-holders to inform policy and program development.¹²⁵ This requires co-developing and supporting Indigenous-led data collection strategies in which Indigenous communities retain ownership and control over the data.¹²⁶

Recommendations

Current strategies and programs have failed to meaningfully reduce housing precarity and homelessness of women and gender-diverse people. Gendered experiences of homelessness are complex, and housing needs may vary amongst the groups most impacted. The Canadian government needs to be mindful of the intersectional nature of homelessness and develop policy and programmatic solutions that are targeted, accessible and coordinated. We ask that the Review Panel include the following recommendations in its report:

1. Adopt a definition of homelessness consistent with lived experience

Applying a consistent definition of homelessness across all government-funded housing and homelessness policies and programs is the first step towards meeting the housing needs of women and gender-diverse people. The definition of homelessness under the NHS needs to encompass experiences of hidden homelessness, unsafe and severely inadequate housing.

This would enable women and gender-diverse people in those situations to access the services and benefits currently reserved for people experiencing chronic homelessness.

2. Develop robust monitoring and evaluation frameworks

Canadian governments should bridge the gaps on knowledge around gendered experiences of housing insecurity and homelessness. All levels of government need to develop participatory research and data collection methods to support evidence-based policymaking, using a gender-based analysis (GBA+) lens and decolonialist approach to data collection strategies. A comprehensive national database, that accurately captures changes in rates and experiences of homelessness, would support more robust monitoring frameworks to evaluate the impact of government-funded programs on reducing all forms of homelessness. It also ensures that the government is accountable to the people most impacted, on how public funding and resources are allocated.

3. Prioritize investments in social, non-market and Indigenous-led housing

Canada must urgently curb housing financialization, which has resulted in a loss of deeply affordable units. The federal government can correct this imbalance of housing supply by working with provincial and territorial governments to prioritize investment in the construction and repair of social and non-market housing options that are protected from market forces and can meet the needs of lower income households.

All new private housing developments funded through public investments should be required to include appropriate allocations of affordable housing, family and multigenerational housing, and accessible housing. Affordability requirements in these projects must be consistent with CMHC's definition, which is that housing should cost "less than 30% of a household's before-tax income¹²⁷," and the number of units created should match levels of core housing need for women and gender-diverse people.

In addition, more funding should be allocated to the Urban, Rural and Northern Indigenous Housing Strategy (URNIHS) to meet the depth of housing need of Indigenous women, Two-Spirit and gender-diverse people. Implementation of URNIHS should also ensure that the Indigenous Housing Centre is adequately resourced so that initiatives under the strategy are culturally appropriate and designed for Indigenous people by Indigenous people.

4. Enhance renter protections and supports

Increasing the supply of truly affordable housing is crucial, but it takes time. The federal government needs to ensure that women and gender-diverse people at risk of being evicted due to late rent payments, as a result of excessive rent increases and other types of economic evictions, or because they experience violence in the home, must be afforded better legal protections and social supports to help them maintain their housing security.

The federal government can work with provincial and territorial governments to amend their tenancy laws to include effective rent regulation and vacancy control, and to include measures to prevent discrimination during the pre-tenancy period. It should also require provincial and territorial governments to establish minimum residential maintenance standards to prevent landlord neglect, and should support municipalities in the development of rental licensing programs that respect the human rights of tenants and that ensure rental homes are well-maintained and livable.

In addition, long-term investments are needed to deepen and expand rental assistance and eviction prevention initiatives. This includes increasing amounts given under the Canada Housing Benefit (CHB) and using more flexible eligibility criteria, such as extending the benefit to people on social housing waitlists or in receipt of social assistance. Federal income supports should also be strengthened to address the depth of poverty experienced by women and gender-diverse people. Both income supports and rental assistance should be complemented by targeted emergency funding to prevent single mothers, women with disabilities and survivors of domestic violence from suddenly becoming homeless if they are evicted from their homes.

To further improve protections for survivors of domestic violence, the federal government should work with provincial and territorial governments to introduce Safe at Home programming, in which perpetrators of domestic violence are moved from the home and into supportive housing. This would allow survivors and their dependents to maintain housing security. Additional funding for community-based organizations and legal clinics is needed to enable survivors to access legal aid, health services, and counselling. Safeguards should also be put in place to ensure that abusers are not evicted into homelessness.

5. Prevent discrimination in housing

The federal government can help to overcome legal and operational bottlenecks in addressing discrimination in housing. This can be done by first investigating the nature, scope and impact of discriminatory housing practices across Canada. In addition, increasing funding to federal, provincial and territorial human rights tribunals and commissions can ensure that complaints of discrimination are addressed swiftly. These measures should be supported by adequate resourcing of legal aid systems, through the Tenant Protection Fund for example, so that women and gender-diverse people facing discrimination can be better informed about their rights and receive appropriate legal assistance.

6. Improve shelter capacity and services

Many women and gender-diverse people who experience homelessness do not feel safe in emergency shelters. At the same time, there aren't enough shelter beds across Canada to accommodate unhoused women and gender-diverse people. The federal government needs to significantly increase capital funding for the construction and repair of VAW, women's, 2SLGBTQQIA+ and Indigenous-led shelters, especially in remote and Northern communities.

This should be supported by the adoption of rigorous national standards for the design of shelter spaces, with special attention given to accessible design and inclusive design.

Shelters also need to be adequately resourced to deliver services in a gender-responsive, culturally appropriate and trauma-informed way. This requires dedicated funding to support shelter staff in building their capacity around trauma-informed care, cultural competency and anti-oppression approaches. Expanding operational funding is also key in providing shelter staff with the adequate supports they themselves need, such as access to mental health and wellness supports, Employee Assistance Programs and equitable compensation.

7. Remove barriers to housing stabilization

Women and gender-diverse people face many barriers to exiting homelessness, and there should be adequate pathways available to rapidly stabilize housing. The federal government should work with provincial and territorial governments to fund more housing options with wrap-around services along the housing continuum. There are several promising approaches implemented across Canada (e.g. Housing First programs, social medicine housing, women-centred design), and more resources are required to scale up these initiatives. While it's encouraging that the Reaching Home initiative includes the development of Housing First initiatives, federal investments are needed for the construction and repair of supportive and transitional housing for women and gender-diverse people. This should be supported by the creation of rental housing navigation services that are connected to other key sectors, to help women and gender-diverse people quickly find and access permanent and stable housing.

Endnotes

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- ¹ Statistics Canada (August 2024). [‘Nearly half of Canadians report that rising prices are greatly impacting their ability to meet day-to-day expenses’](#).
- ² Schwan, K., Vaccaro, M., Reid, L., Ali, N., & Baig, K. (2021). [The Pan-Canadian Women’s Housing & Homelessness Survey](#). Canadian Observatory on Homelessness.
- ³ Canadian Centre for Housing Rights, National Indigenous Women’s Housing Network, National Right to Housing Network & Women’s National Housing and Homelessness Network (September 2024). [Equality, the human right to housing and women & gender-diverse persons in Canada](#). Joint submission to the 89th Session of the Committee on the Elimination of All Forms of Discrimination Against Women.
- ⁴ Pomeroy, Steve (October 2022). [Updating analysis on erosion of lower rent stock from 2021 census](#). Canadian Housing Evidence Collaborative.
- ⁵ CEDAW submission, *supra* note 3
- ⁶ Whitzman, C. & Desroches, M.E. (2022). [Women’s Housing: Balancing Scaling and Caring in Three Canadian Cities](#). International Journal of Housing Policy.
- ⁷ CEDAW submission, *supra* note 3
- ⁸ Canadian Centre for Housing Rights (2024). [Nowhere to Go: Gender-Based Violence and Housing Insecurity in Ontario](#).
- ⁹ Pan-Canadian Survey, *supra* note 2
- ¹⁰ Canadian Centre for Housing Rights (2025). [Measuring Discrimination in Rental Housing Across Canada](#).
- ¹¹ Women’s National Housing and Homelessness Network (June 2022). [The Crisis Ends with Us: Request for a Review into the Systemic Denial of the Equal Right to Housing of Women and Gender-Diverse People in Canada](#). Submission to the Federal Housing Advocate.
- ¹² Pan-Canadian Survey, *supra* note 2
- ¹³ Measuring Discrimination, *supra* note 10
- ¹⁴ Statistics Canada (October 2024). [‘Trends in police-reported family violence and intimate partner violence in Canada, 2023’](#).
- ¹⁵ Women and Gender Equality Canada (January 2025). [‘Intimate Partner Violence’](#).
- ¹⁶ Statistics Canada (May 2021). [‘Intimate Partner Violence among Diverse Populations in Canada, 2018’](#).
- ¹⁷ Treleaven, Sarah (February 2020). [‘Why Don’t Women Leave Abusive Relationships?’](#). United Way Greater Toronto.
- ¹⁸ Nowhere to Go, *supra* note 8
- ¹⁹ 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](#). Canadian Observatory on Homelessness Press.
- ²⁰ Canadian Human Rights Commission and Office of the Federal Housing Advocate (December 2024). [‘New data highlights troubling housing inequalities for people with disabilities’](#).
- ²¹ Canadian Centre for Housing Rights (July 2021). [Setbacks in Realizing Women’s Right to Housing in Canada](#). Report to the United Nations Commission on the Status of Women.
- ²² Canadian Centre for Housing Rights (March 2021). [‘The Systemic Barriers to Women’s Right to Housing’](#).
- ²³ CEDAW submission, *supra* note 3
- ²⁴ Nowhere to Go, *supra* note 8

-
- ²⁵ Trudell, A.L. & Whitmore, E. (2020). [Pandemic Meets Pandemic: Understanding the Impacts of COVID-19 on Gender-Based Violence Services and Survivors in Canada](#). Ending Violence Association of Canada & Anova.
- ²⁶ Owen, Brenna (November 2020). '[Canada-wide survey of women's shelters shows abuse more severe during COVID-19](#)'. CityNews Toronto.
- ²⁷ Systemic Barriers, *supra* note 22
- ²⁸ Gaetz, S., DeJ, E., Richter, T. & Redman, M. (2016). [The State of Homelessness in Canada 2016](#). Canadian Observatory on Homelessness Press.
- ²⁹ State of Women's Housing Need, *supra* note 19
- ³⁰ Public Health Agency of Canada (July 2012). '[Family Violence and Homelessness: A Review of the Literature](#)'.
- ³¹ Pan-Canadian Survey, *supra* note 2
- ³² State of Women's Housing Need, *supra* note 19
- ³³ Crisis Ends with Us, *supra* note 11
- ³⁴ Nowhere to Go, *supra* note 8
- ³⁵ Canadian Centre for Housing Rights & CTLabs (September 2024). '[Understanding and Estimating Hidden Homelessness in Saskatoon](#)'.
- ³⁶ State of Women's Housing Need, *supra* note 19
- ³⁷ Crisis Ends with Us, *supra* note 11
- ³⁸ *Ibid.*
- ³⁹ Pan-Canadian Survey, *supra* note 2
- ⁴⁰ Housing, Infrastructure and Communities Canada (September 2024). '[Homeless Shelter Capacity in Canada from 2016 to 2022](#)'.
- ⁴¹ State of Women's Housing Need, *supra* note 19
- ⁴² Setbacks in Realizing Women's Right to Housing, *supra* note 21
- ⁴³ Schiff, R., Wilkinson, A., Kelford, T., Pelletier, S., & Waegemakers Schiff, J. (2022). [Counting the Undercounted: Enumerating Rural Homelessness in Canada](#). International Journal on Homelessness.
- ⁴⁴ Nowhere to Go, *supra* note 8
- ⁴⁵ State of Women's Housing Need, *supra* note 19
- ⁴⁶ Women's National Housing and Homelessness Network, Canadian Centre for Housing Rights & National Right to Housing Network (July 2024). [Human Rights-Based, Gender-Sensitive National Standards for Emergency Shelters Across Canada to Advance the Right to Housing for Women and Gender-Diverse Persons](#).
- ⁴⁷ Pan-Canadian Survey, *supra* note 2
- ⁴⁸ National Shelter Standards, *supra* note 46
- ⁴⁹ *Ibid.*
- ⁵⁰ *Ibid.*
- ⁵¹ Nowhere to Go, *supra* note 8
- ⁵² Estimating Hidden Homelessness, *supra* note 35
- ⁵³ BC Society of Transition Houses (2011). [Reducing Barriers to Support for Women Fleeing Violence: A Toolkit for Supporting Women with Varying Levels of Mental Wellness and Substance Use](#).
- ⁵⁴ Nowhere to Go, *supra* note 8

-
- ⁵⁵ Tabibi, J., & Baker, L.L (2017). [Exploring the Intersections: Immigrant and refugee women fleeing violence and experiencing homelessness in Canada](#). Centre for Research and Education on Violence Against Women & Children.
- ⁵⁶ Reducing Barriers, *supra* note 53
- ⁵⁷ BC Society of Transition Houses (February 2011). [Report on Violence Against Women, Mental Health and Substance Use](#). Canadian Women's Foundation.
- ⁵⁸ Reducing Barriers, *supra* note 53
- ⁵⁹ Nowhere to Go, *supra* note 8
- ⁶⁰ Fitzpatrick, S., Mackie, P. & Wood, J. (2021). [Advancing a Five-Stage Typology of Homelessness Prevention](#). International Journal on Homelessness.
- ⁶¹ Pan-Canadian Survey, *supra* note 2
- ⁶² Women's National Housing and Homelessness Network (May 2021). [Implementation of The Right to Housing for Women, Girls, And Gender Diverse People in Canada](#).
- ⁶³ Nowhere to Go, *supra* note 8
- ⁶⁴ Statistics Canada (2007). [Canada's shelters for abused women, 2005/2006](#).
- ⁶⁵ Office of the United Nations High Commissioner for Human Rights. '[Universal Declaration of Human Rights](#)'.
- ⁶⁶ Office of the United Nations High Commissioner for Human Rights. '[International Covenant on Economic, Social and Cultural Rights](#)'.
- ⁶⁷ Office of the United Nations High Commissioner for Human Rights. [The Right to Adequate Housing: Fact Sheet No. 21](#).
- ⁶⁸ Office of the United Nations High Commissioner for Human Rights. '[International Human Rights Law](#)'.
- ⁶⁹ United Nations Committee on Economic, Social and Cultural Rights (December 1991). [CESCR General Comment No. 4: The Right to Adequate Housing \(Art. 11 \(1\) of the Covenant\)](#).
- ⁷⁰ Office of the United Nations High Commissioner for Human Rights. '[Declaration on the Elimination of Violence against Women](#)'.
- ⁷¹ Office of the United Nations High Commissioner for Human Rights. '[Convention on the Elimination of All Forms of Discrimination against Women](#)'.
- ⁷² Committee on the Elimination of Discrimination against Women (August 2015). [General recommendation No. 33 on women's access to justice](#).
- ⁷³ United Nations (2007). [United Nations Declaration on the Rights of Indigenous Peoples](#).
- ⁷⁴ Office of the United Nations High Commissioner for Human Rights. '[Convention on the Rights of Persons with Disabilities](#)'.
- ⁷⁵ United Nations Committee on Economic, Social and Cultural Rights (December 1990). [CESCR General Comment No. 3: The Nature of States Parties' Obligations \(Art. 2, Para. 1 of the Covenant\)](#).
- ⁷⁶ Government of Canada (2019). '[National Housing Strategy Act](#)'
- ⁷⁷ Housing, Infrastructure and Communities Canada. '[About the National Housing Strategy](#)'.
- ⁷⁸ Women and Gender Equality Canada (April 2024). '[National Action Plan to End Gender-Based Violence Backgrounder](#)'
- ⁷⁹ Government of Canada (2022). [In Brief: National Action Plan to End Gender-Based Violence](#).
- ⁸⁰ Missing and Murdered Indigenous Women and Girls (June 2019). [Calls for Justice](#).
- ⁸¹ Missing and Murdered Indigenous Women and Girls (June 2019). [Reclaiming Power and Place: The Final Report of the National Inquiry into Missing and Murdered Indigenous Women and Girls](#).
- ⁸² Missing and Murdered Indigenous Women and Girls (2021). '[Missing and Murdered Indigenous Women, Girls, and 2SLGBTQIA+ People National Action Plan](#)'.

-
- ⁸³ Canada Mortgage and Housing Corporation (June 2024). [Progress on the National Housing Strategy](#).
- ⁸⁴ *Ibid.*
- ⁸⁵ Canada Mortgage and Housing Corporation (March 2025). '[Core housing need and gender](#)'.
- ⁸⁶ Statistics Canada (June 2023). '[A review of Canadian homelessness data, 2023](#)'.
- ⁸⁷ Housing, Infrastructure and Communities Canada (January 2024). '[Everyone Counts 2020-2022 – Results from the Third Nationally Coordinated Point-in-Time Counts of Homelessness in Canada](#)'.
- ⁸⁸ Hogue, R. & Battaglia, R. (December 2022). '[Proof Point: Is Canada becoming a nation of renters?](#)'. Royal Bank of Canada.
- ⁸⁹ Canada Mortgage and Housing Corporation (September 2023). [Housing shortages in Canada: Updating how much housing we need by 2030](#).
- ⁹⁰ Whitzman, Carolyn (November 2023). [A Human Rights-Based Calculation of Canada's Housing Supply Shortages](#). Canadian Human Rights Commission.
- ⁹¹ Blueprint ADE & Wellesley Institute (February 2022). [Analysis of Affordable Housing Supply Created by Unilateral National Housing Strategy Programs: Research Report](#). National Housing Council.
- ⁹² CEDAW submission, *supra* note 3
- ⁹³ Housing, Infrastructure and Communities Canada (2024). [Solving the Housing Crisis: Canada's Housing Plan](#).
- ⁹⁴ Office of the United Nations High Commissioner for Human Rights. '[Homelessness and human rights](#)'.
- ⁹⁵ Housing, Infrastructure and Communities Canada (April 2022). '[Backgrounder - Reaching Home](#)'.
- ⁹⁶ Office of the Auditor General of Canada (2022). [Report 5: Chronic Homelessness](#).
- ⁹⁷ National Shelter Standards, *supra* note 46
- ⁹⁸ Estimating Hidden Homelessness, *supra* note 35
- ⁹⁹ Statistics Canada (February 2025). '[Exiting homelessness: An examination of factors contributing to regaining and maintaining housing](#)'.
- ¹⁰⁰ Social Housing and Human Rights (June 2024). [Submission to the Standing Committee on Human Resources, Skills and Social Development and the Status of Persons with Disabilities on Federal Housing Investments](#).
- ¹⁰¹ CEDAW submission, *supra* note 3
- ¹⁰² Reducing Barriers, *supra* note 53
- ¹⁰³ Wright, A.C. & Bertrand, L.D. (2017). [Access to Legal Services in Women's Shelters](#). J Fam Viol 32.
- ¹⁰⁴ Nelson, A., Malenfant, J., & Schwan, K. (2023). [Research Brief on Housing Need & Homelessness amongst Gender-Diverse People in Canada](#). Women's National Housing & Homelessness Network.
- ¹⁰⁵ Exploring the Intersections, *supra* note 55
- ¹⁰⁶ Women's Shelters Canada (August 2017). [Housing, Homelessness, and Violence Against Women: A Discussion Paper](#).
- ¹⁰⁷ *Ibid.*
- ¹⁰⁸ Estimating Hidden Homelessness, *supra* note 35
- ¹⁰⁹ Bretherton, Joanne (2017). [Reconsidering Gender in Homelessness](#). European Journal of Homelessness 11 (1).
- ¹¹⁰ Nowhere to Go, *supra* note 8
- ¹¹¹ Office of the Federal Housing Advocate (2024). [Upholding Dignity and Human Rights: The Federal Housing Advocate's Review of Homeless Encampments](#).
- ¹¹² State of Women's Housing Need, *supra* note 19
- ¹¹³ Crisis Ends with Us, *supra* note 11

-
- ¹¹⁴ Office of the United Nations High Commissioner for Human Rights. '[The human right to adequate housing](#)'.
- ¹¹⁵ Balancing Scaling and Caring, *supra* note 6
- ¹¹⁶ StatCan, *supra* note 85
- ¹¹⁷ Social Planning and Research Council of British Columbia (2011). [Knowledge for Action: Hidden Homelessness in Prince George, Kamloops, Kelowna, Nelson and Nanaimo](#).
- ¹¹⁸ Distasio, J., Sylvestre, G. & Mulligan, S. (2005). [An Examination of Hidden Homelessness Among Aboriginal Peoples in Prairie Cities](#). Institute of Urban Studies.
- ¹¹⁹ Estimating Hidden Homelessness, *supra* note 35
- ¹²⁰ Flock, I., Benjamin, E.A. (May 2019). [Best Practices in Addressing Homelessness: A Literature Review of Existing Research](#). University of British Columbia.
- ¹²¹ University Health Network (October 2024). '[Prescription for change: UHN leads Canada's first Social Medicine Housing Initiative](#)'.
- ¹²² Estimating Hidden Homelessness, *supra* note 35
- ¹²³ Malenfant, J., Annan, J., Pin, L., Levac, L. & Buchnea, A. (2024). [Toward the Right to Housing in Canada: Lived Experience, Research and Promising Practices in Deep Engagement](#). Engaged Scholar Journal, 10(2).
- ¹²⁴ Reclaiming Power and Place, *supra* note 80
- ¹²⁵ National Indigenous Feminist Housing Working Group (2022). [Homeless on Homelands: Upholding Housing as a Human Right for Indigenous Women, Girls, Two-Spirit, and Gender-Diverse People](#). Keepers of the Circle.
- ¹²⁶ Estimating Hidden Homelessness, *supra* note 35
- ¹²⁷ Canada Mortgage and Housing Corporation (March 2018). '[About Affordable Housing in Canada](#)'.