

Neha

**We are human.
We deserve a place to live.
It's that simple.**

**FINAL REPORT AND RECOMMENDATIONS
OF THE NEHA REVIEW PANEL**

 **National
Housing
Council** | **Conseil
national du
logement**

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Housing
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Aussi disponible en français sous le titre : « *Nous sommes des êtres humains. Nous sommes dignes d'un endroit où vivre. C'est aussi simple que cela* » : rapport final et recommandations de la commission d'examen Neha.

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This is one of three reports published by the Neha review panel. Others include:

- A What We Heard Report: “A place where we can breathe, heal, and belong”: *What women, Two Spirit, Trans, and gender-diverse people of all origins told the Neha Review Panel about their right to safe, adequate, and affordable housing.*
- A legal analysis paper: *International Law and the Human Right to Adequate Housing for Women, Two-Spirit, Trans, and Gender-Diverse People.*

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Letter from the panel

The Honourable Gregor Robertson
Minister of Housing and Infrastructure
Government of Canada

Subject: Submission of the Neha Review Panel Report

Dear Minister Robertson,

We are honoured to submit the Neha Review Panel's final report, *We're human beings. We deserve a place to live. It's that simple*, prepared under the authority of the *National Housing Strategy Act*.

This report examines the right to safe, adequate, and affordable housing for women, Two Spirit, Trans, and gender-diverse people, and the government's duty to uphold this right. It reflects the voices and experiences of over 500 rights holders and community-led organizations, across Canada, and submissions from federal departments. It identifies systemic gendered and racialized barriers to the right to housing that continue to place lives at risk.

After listening to those most affected and reviewing extensive evidence, the Neha Review Panel has concluded that Canada is not fulfilling all the conditions to realize the right to housing in Canada in an inclusive, gender-responsive, and human rights-based manner. This has profound consequences, including increased exposure to violence, child apprehension, institutionalization, and homelessness. These impacts disproportionately affect women, Two Spirit, Trans, and gender-diverse people who are Indigenous, Black, racialized, living with disabilities, immigrants and refugees, youth, older adults, survivors of violence, and others in greatest need.

The *National Housing Strategy Act* affirms housing as a fundamental human right, and commits the federal government to its progressive realization, especially for those in greatest need. Yet, our findings demonstrate significant gaps in the implementation of the NHSA in current policies and programs. As a result, federal housing policy has fallen short of NHSA commitments, and homelessness and inadequate housing have continued to worsen for women, Two Spirit, Trans and gender-diverse people.

This report outlines a comprehensive set of conclusions and recommendations to support Canada in fulfilling its obligations and transforming its housing system into one that truly reflects the values of equity, dignity, and justice. These recommendations are rooted in international human rights law, the NHSA, and the collective wisdom of those who live the realities of housing insecurity every day. Women, Two Spirit, Trans, and gender-diverse people, and the organizations that support them, are calling on the federal government to think outside the box. Together, we can build a Canada in which the right to housing is made real, and no one is left behind.

We urge you to treat this report as a call to action. For generations to come - the time for transformative change is now. We look forward to your response to our conclusions and recommendations and to working together to ensure that housing is truly upheld as a human right for all.

With respect,

Sylvia Maracle (Skonaganleh:ra)
Pamela Glode Desrochers
Marie Pascaline Menono
Neha Review Panel Members

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Dedication

This report is dedicated to all the women, Two Spirit, Trans, and gender-diverse people in Canada of all ages, racial identities, and origins, from coast to coast to coast, who are at risk of being left behind including: First Nations, Inuit, and Métis; Black and racialized people; people living with all types of disabilities; immigrants and refugees; people of all ages from infants to elders; people who use substances; people with and without children; people of diverse sexual orientations and gender identities; people living on low-income; sex workers; people with lived and living experience of all forms of homelessness; people who have been incarcerated and institutionalized; people living in urban, rural, and Northern areas; survivors of violence and human trafficking; veterans; and all others at risk of being left behind.

To all whose lives have been lost and whose families have been torn apart because they did not have safe, adequate, and affordable housing.

To those who work every day in the face of immense obstacles to make a safe, adequate home for themselves and their loved ones.

To all those striving to make a difference, to uphold the right to housing where governments have failed in their obligation to do so.

And to future generations, in the hope that they will live in a world where everyone has a safe, adequate, and affordable home.



Sylvia Maracle (Skonaganleh:ra) is a 2Spirited Mohawk, Wolf Clan member from Tyendinaga Mohawk Territories. She was the Executive Director of the Ontario Federation of Indigenous Friendship Centres for 41 years and the founding Chair of Ontario Aboriginal Housing Services from 1979-2001.



Pamela Glode Desrochers is L'nu and belongs to Millbrook First Nation. She has worked with the Mi'kmaw Native Friendship Centre for over 28 years and has been Executive Director for over 12 years. Pamela was recently elected President of the National Association of Friendship Centres.



Marie Pascaline Menono is a social worker specializing in intersectional Gender-based Analysis Plus (GBA+) and human rights. Marie Pascaline has been a gender adviser at the United Nations and for various international organizations.

Summary

The Neha Review Panel was established to examine the right to safe, adequate, and affordable housing for women, Two Spirit, Trans, and gender-diverse people, and the government's duty to uphold this right. After hearing from more than 500 rights holders and community-led organizations, and reviewing submissions from federal institutions, **Neha concludes that Canada is not meeting all the conditions required to realize the right to housing in a manner that is inclusive, gender-sensitive, and consistent with its human rights obligations.** The consequences for women, Two Spirit, Trans, and gender-diverse people are profound and incompatible with Canada's human rights commitments.



CONCLUSIONS

Neha underscores that Canada's obligations under international human rights law require the progressive realization of the right to adequate housing without discrimination. Housing is not merely a commodity but a fundamental human right essential to dignity, equality, and security. Neha's findings highlight persistent gaps that disproportionately affect women, Two Spirit, Trans, and gender-diverse persons, particularly those who are Indigenous, racialized, newcomers, or living with disabilities. These gaps reflect historic and systemic factors, deepen gendered and racialized inequalities, and create harmful consequences for interconnected rights, including family life, equality, and security. The following conclusions outline key concerns and opportunities for Canada to strengthen housing policies and programs in line with its domestic and international human rights commitments.

1.

Women, Two Spirit, Trans and gender-diverse people of all ages and backgrounds claim a holistic right to housing

Neha affirms that the right to housing, as expressed by women, Two Spirit, Trans, and gender-diverse persons, is holistic and consistent with international human rights standards. This vision encompasses not only shelter but also safety, health, cultural identity, autonomy, and connection to community. It reflects the interdependence of housing with other rights and the essential conditions for living with dignity.

Neha encourages Canada to ensure that housing policies and programs reflect this holistic understanding and respond to the diverse realities of marginalized groups. Realizing the right to housing in this way is essential to ensuring that all individuals—regardless of gender identity, age, race, disability, or status—can access housing that supports their full and equal participation in society.

2.

The housing crisis for Indigenous women, Two Spirit, Trans, and gender-diverse people is rooted in colonialism

Neha observes that despite Canada's commitments to reconciliation and Indigenous rights, significant challenges remain in addressing the housing crisis facing Indigenous women, Two Spirit, Trans, and gender-diverse persons. The enduring impacts of colonial policies—including forced displacement, gendered discrimination, and systemic underfunding—continue to shape housing insecurity and exclusion.

While distinctions-based strategies and the Urban, Rural, and Northern Indigenous Housing Strategy represent important progress, funding has not yet been fully released and, in many cases, remains insufficient to address deep gaps left by colonial legacies. To quote the latest report to Parliament on progress toward implementation of the UNDRIP Action Plan, “Limited funding, capacity challenges, and fragmented implementation across departments continue to hinder progress.” This has disproportionate impacts for Indigenous women, Two Spirit, Trans, and gender-diverse people who live on- and off-community. Neha emphasizes that upholding the right to housing requires sustained investment in Indigenous-led, culturally appropriate housing solutions that reflect the lived realities and governance of Indigenous Peoples.

3.

Canada's National Housing Strategy has not fulfilled the NHSA requirement that it improve housing outcomes for women, Two Spirit, Trans, gender-diverse people in greatest need

Neha concludes that Canada's National Housing Strategy (NHS) does not fully align with the requirements of the *National Housing Strategy Act* to progressively realize the right to adequate housing. While the NHS has increased federal investment in housing, it has not consistently prioritized those in greatest need—particularly women, Two Spirit, Trans, and gender-diverse people, who face systemic barriers to safe, affordable housing.

4.

Gendered and racialized income inequities shut women, Two Spirit, Trans and gender-diverse people out of safe, adequate housing

Neha finds that income inequality remains a major barrier to housing affordability for women, Two Spirit, Trans, and gender-diverse people. These inequities intersect with race, disability, and newcomer status, increasing vulnerability to housing insecurity.

Neha emphasizes that Canada has both the responsibility and capacity to ensure that individuals have sufficient income to afford safe, adequate housing without sacrificing other basic needs. Addressing income inequality is essential to fulfilling the right to housing and reducing housing insecurity for marginalized communities.

5.

Federal policies and programs do not adequately address intersecting, systemic barriers for women, Two Spirit, Trans, and gender-diverse people who are Indigenous, racialized, newcomers, and living with disabilities

Neha notes that federal housing policies and programs do not consistently address the intersecting and systemic barriers faced by women, Two Spirit, Trans, and gender-diverse persons who are Indigenous, Black, racialized, newcomers, and persons with disabilities. These groups experience disproportionate housing insecurity due to discriminatory practices, inaccessible housing design, rigid occupancy standards, and limited culturally appropriate and community-led housing options.

Neha encourages Canada to adopt a rights-based, intersectional approach to housing policy that reflects diverse lived realities. This includes ensuring meaningful participation in program design, eliminating discriminatory barriers in the private rental market, and investing in inclusive, accessible, and permanent housing solutions that uphold dignity and autonomy.

6.

Systemic gaps in the right to housing for women, Two Spirit, Trans, and gender-diverse people contribute to child apprehension, institutionalization, and criminalization

Neha's findings indicate that gaps in housing access and supports lead to serious and compounding consequences, including institutionalization, child apprehension, incarceration, and exclusion from essential services—particularly for those facing intersecting forms of marginalization. Institutional responses are not a substitute for housing; they often exacerbate vulnerability, stigma, and harm and are inconsistent with Canada's human rights commitments, including under the Convention on the Rights of the Child and the Convention on the Rights of Persons with Disabilities.

Neha urges Canada to take immediate measures to redirect public resources from costly institutional systems toward inclusive, community-based housing solutions that are Indigenous-led, gender-responsive, and culturally appropriate. Coordinated action across jurisdictions and dismantling structural barriers are essential to ensuring housing systems uphold dignity and equality.



RECOMMENDATIONS

Neha's recommendations form a comprehensive roadmap to uphold the right to housing for diverse women, Two Spirit, Trans, and gender-diverse people across Canada. **They call for a decisive shift away from colonial, institutional, and market-driven approaches toward community-led, rights-based housing systems rooted in equity, inclusion, and self-determination. With Canada's current economic conditions intensifying housing insecurity, it is more urgent than ever to act—and to learn from past mistakes, particularly the misallocation of housing resources.** By mobilizing all available resources, aligning standards across jurisdictions, and centering the voices of those most affected by housing precarity, Canada can fulfill its human rights obligations and build a future where everyone has access to safe, adequate, and affordable housing—without exception—so that no one is left behind.

1.

Transform Canada's colonial housing system to uphold the right to housing for Indigenous peoples.

- a. Uphold and expand funding commitments to the Urban, Rural, and Northern (URN) Indigenous Housing Strategy.
- b. Uphold and expand funding commitments to the distinctions-based First Nations, Métis, and Inuit housing strategies.
- c. Prioritize Indigenous women, Two Spirit, Trans, and gender-diverse people in federal policies and programs.
- d. Uphold Indigenous self-determination, respect Indigenous data sovereignty, and enable exercise of jurisdiction over housing, lands, and social programs.

2.

Fund and equip community-led organizations to house and support their members.

- a. Partner with community-led and Indigenous organizations focused on gender and equity to lead housing initiatives.
- b. Invest the maximum available resources in a timely manner to enable Indigenous and community-led housing.
- c. Prioritize housing with community-based supports identified by communities themselves.

3.

Provide inclusive emergency and transitional supports for diverse women, Two Spirit, Trans, and gender-diverse people facing violence and homelessness, while committing to permanent housing.

- a. Guarantee access to inclusive, accessible, and culturally safe shelters and transitional housing for all—including families; refugees; Two Spirit, Trans, and gender-diverse individuals; people with disabilities; and survivors of violence.
- b. Ensure that all shelters and transitional housing are accessible, culturally adequate, inclusive, and provide community-based supports.
- c. Develop and support the implementation of a national road map to transition from reliance on emergency shelters to the provision of safe, adequate housing.



4.

Fulfill the right to affordable housing and an adequate standard of living for diverse women, Two Spirit, Trans, and gender-diverse people.

- a. Clearly define affordable housing supply targets for the lowest income groups, and support only those projects that guarantee long-term affordability.
- b. Increase incomes to support housing stability and uphold the right of diverse women, Two Spirit, Trans, and gender-diverse people to social security and an adequate standard of living.

5.

Establish human rights-based standards across jurisdictions.

- a. Exercise leadership on human rights through conditionalities in federal funding transfers.
- b. Establish common targets, timelines, and outcome-based metrics that are rooted in human rights, including Indigenous rights.
- c. Seek a pan-Canadian commitment at the FPT Housing Forum to protect tenants from discrimination, require accessible housing, and uphold security of tenure.

6.

Reduce the use of costly institutional systems by increasing access to safe, adequate, and affordable housing for women, Two Spirit, Trans, and gender-diverse people across the life cycle.

- a. Role model the reallocation of federal investments from institutions to homes by redirecting funding from emergency and transitional housing toward permanent, safe, adequate, and affordable housing.
- b. Coordinate with other federal departments and jurisdictions to support the redirection of federal funding from institutions toward safe, adequate, and affordable housing.

Women, Two Spirit, Trans, and gender-diverse people: The Neha Panel understands that women, Two Spirit, Trans, and gender-diverse people of all origins encompass a diversity of identities across the life span. The “**Neha Wheel**”, an adaptation of the Medicine Wheel teaching, depicts the diversity within and among these groups. The phrase “women, Two Spirit, Trans, and gender-diverse people” in this report refers to diverse identities, including: First Nations, Inuit, and Métis; Black and of colour; living with all types of disabilities; immigrants and refugees; of all ages from infants to elders; with and without children; of diverse sexual orientations and gender identities; living on low-income; living in urban, rural, and Northern areas; survivors of violence and human trafficking; sex workers; people with lived and living experience of all forms of homelessness; those who use substances; those who have been incarcerated and institutionalized; veterans; and all others at risk of being left behind, from coast to coast to coast.



Introduction: The Right to Live in Peace, Dignity, and Security

The Neha Review Panel was established to examine the right to safe, adequate, and affordable housing for **women, Two Spirit, Trans, and gender-diverse people**, and the government's duty to uphold this right.

Community-led organization: An organization that is led by, represents, and serves communities directly affected by inadequate housing and homelessness. Examples include gender-based violence shelters, women's centres, Indigenous friendship centres, community land trusts, lived expert led organizations, refugee reception centres, Black-led organizations, multi-service neighbourhood centres, tenant associations, faith-based organizations, 2SLGBTQIA+ community centres, immigrant-serving organizations, and cultural community associations.

After engaging over 500 rights holders and **community-led organizations**, and reviewing submissions from federal institutions,

Neha concludes that Canada is not currently meeting all the conditions required to realize the right to housing in a manner that is inclusive, gender-sensitive, and consistent with its human rights obligations.

The consequences for women, Two Spirit, Trans, and gender-diverse people are unacceptable, profound and incompatible with Canada's human rights commitments.

Despite the federal government's commitments under the *National Housing Strategy Act* (NHSA)¹ to implement a human rights–based approach and improve housing outcomes for those in greatest need, most federal housing investments have prioritized private market developments.

These have failed to deliver housing that is truly affordable, accessible, and suitable for low- and moderate-income households—**especially those led by women, Two Spirit, Trans and gender-diverse people who are First Nations, Inuit, and Métis; Black and racialized; living with all types of disabilities; immigrants and refugees; youth and older adults; lone parents; 2SLGBTQIA+; living on low-income; survivors of violence; sex workers; those who use substances; those who have been incarcerated or institutionalized; and veterans, among other groups.**

Neha's review found that the specific and diverse needs of women, Two Spirit, Trans, and gender-diverse people remain largely invisible in federal housing strategies. There are no clear targets, timelines, or evaluation frameworks to measure progress in meeting their housing needs. The result is a housing system that perpetuates systemic discrimination; deepens income inequality; and contributes to unsafe living conditions, barriers to escaping violence, family separation, and institutionalization. **Women, Two Spirit, Trans, and gender-diverse people of all backgrounds and ages are being left behind in Canada's housing policy.**

Participants in the dialogue process made it clear: **Canada is not treating housing as a human right.**

To remedy this, the recommendations in this report call for a transformative shift in how housing policy is designed, funded, and implemented. This includes:

- Honouring Treaty obligations and implementing the Calls to Action and Calls for Justice from past inquiries and commissions;
- Recognizing housing as a human right, not a commodity;
- Eliminating discrimination in law, policy, and practice;
- Investing the maximum available resources to meet urgent needs;
- Ensuring meaningful participation of rights holders in all stages of policy development; and
- Supporting community-led solutions, especially those grounded in lived experience.

“I can't believe that people still speculate why women, Two Spirit, Trans, and gender-diverse people stay in dysfunctional and often violent relationships. The answer is simple: first there has to be housing to move into and second you need to have an adequate income in order to afford to live in that housing.”

– submission to the Neha dialogue

1 *National Housing Strategy Act*. (2019). [National Housing Strategy Act](#); c. 29, s. 313.

“We’re human beings. We’re people. We deserve a place to live. It’s that simple.”

– Neha dialogue participant

These recommendations are rooted in the lived realities of those most affected by housing insecurity.

They are designed to help Canada fulfill its domestic and international human rights commitments, and to realize a future where all women, Two Spirit, Trans, and gender-diverse people can live in peace, dignity, and security.

This report is one of three reports published by the Neha review panel². It presents the Neha review panel’s opinions and its recommendations to the federal Minister of Housing and Infrastructure. It is informed by the insights shared by **i lived experts** and community advocates³, and builds on numerous previous reports and inquiries including the Final Report and Calls for Justice of the National Inquiry into Missing and Murdered Indigenous Women and Girls; the Final Report of the Truth and Reconciliation Commission of Canada including its Calls to Action; and previous reports by the Federal Housing Advocate⁴ and National Housing Council.⁵

The report is divided into four sections: Human Right to Housing Obligations under International and Domestic Law, the Neha Review Panel, Conclusions, and Recommendations. Neha’s four stage approach to inquiry – Vision, Knowledge, Reason, and Action – is integrated throughout the report.

The members of Neha express their deepest gratitude to all those women, Two Spirit, Trans, and gender-diverse people of all origins, and the organizations that support them, for the time and effort they took to share their vision of safe, affordable housing; their experiences of claiming this right; their insights into the systemic barriers they have faced; and their calls for action.

i Lived expert: A person with lived experience of systemic housing issues such as homelessness, inadequate housing, and gender-based violence. Lived expertise is indispensable to realizing the right to housing. In keeping with the disability rights principle of Nothing About Us, Without Us, human rights law mandates governments to ensure meaningful, ongoing engagement and leadership of people directly affected in the development, implementation, monitoring, and evaluation of housing policies.

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- 2 The two other reports are: A place where we can breathe, heal, and belong”: What women, Two Spirit, Trans, and gender-diverse people of all origins told the Neha Review Panel about their right to safe, adequate, and affordable housing; and International Law and the Human Right to Adequate Housing for Women, Two Spirit, Trans, and Gender-Diverse People.
 - 3 Written submissions from individuals, organizations, and government departments, along with recordings and summaries from oral dialogues, are published [here](#) as part of Neha’s hearing record.
 - 4 Canadian Human Rights Commission. (2023). [Observational report: Inuit housing](#); Canadian Human Rights Commission. (2023). [Claiming the right to housing: The Federal Housing Advocate’s review of Métis housing conditions, in partnership with the Government of Métis Nation–Saskatchewan](#); Canadian Human Rights Commission. (2023). [Final report: The Federal Housing Advocate’s review of encampments](#). Canadian Human Rights Commission. (2023). [Observational report: Inuit housing](#).
 - 5 See for example: [National Housing Council \(2021\). National Urban, Rural and Northern Indigenous Housing & Homelessness: A Case for Support and Conceptual Model](#); National Housing Council (2022). [The Progressive Realization of the Right to Adequate Housing: Literature Review](#); National Housing Council (2023). [Renewing Canada’s National Housing Strategy: A comprehensive report on improving Canada’s affordable housing challenge](#); National Housing Council (2024). [Review Panel Report on the Financialization of Purpose-Built Rental Housing](#)



Human Right to Housing Obligations under International & Domestic Law



i *Right to adequate housing:* Adequate housing is recognized as a human right in international law. In 2019, Canada passed the *National Housing Strategy Act* to advance the human right to housing in Canada.

Housing must meet specific criteria to be considered adequate. It must:

- Provide security of tenure, so that its occupants have legal protection from eviction and can choose how long they want to stay;
- Be affordable, so that the cost of housing doesn't interfere with access to other basic needs such as food and transportation;
- Be accessible to meet the needs of people with disabilities and marginalized groups;
- Be in safe and healthy condition, and large enough for the household living there;
- Have access to services and infrastructure such as drinking water, electricity, heat, cooling, and communications technology;
- Be in an appropriate location with access to transit, employment, education, health and social services, and protected from environmental hazards;
- Be culturally appropriate for the occupants' way of life.

Everyone in Canada has a right to access adequate housing without discrimination or abuse, and to live in peace, security, and dignity in their home.

THE HUMAN RIGHT TO HOUSING FOR ALL WOMEN, TWO SPIRIT, TRANS, AND GENDER-DIVERSE PEOPLE IN INTERNATIONAL LAW

i *All individuals are rights-holders.* Rights-holders are entitled to have their rights respected, and to be able to access fair and effective mechanisms to undo the harm caused by any rights violations they may experience.

Governments and government agencies are the ultimate duty-bearers, responsible not only for respecting human rights, but also for taking all measures necessary to protect against rights violations, providing effective mechanisms to address any violations that do occur, and working proactively, and to the fullest extent of their resources, to ensure every person can fully enjoy their rights.

All individuals, organizations, institutions, and corporations have the responsibility to respect human rights.

The human right to adequate housing is well-established in international law⁶. This includes legally binding international human rights treaties, such as the International Covenant on Economic, Social and Cultural Rights (ICESCR), ratified by Canada almost half a century ago, in 1976.

International human rights bodies have established that the right to adequate housing is a holistic right that goes beyond mere shelter. The UN expert committee that oversees the ICESCR has stated that

“the right to housing must not be interpreted narrowly, such as referring to housing as a commodity or a mere physical dwelling. The right to housing is defined as the right to a place to live in peace, dignity, and security.”⁷

Similarly, UN-Habitat, the lead UN agency promoting the right to housing, has written,

“Housing is most importantly about providing good-quality homes for all, with all the associated social and economic benefits, and should not be viewed as a mere matter of physical structures or as a commodity to be bought and sold. Adequate housing is essential for health, education, dignity, safety, and social inclusion....”⁸

6 See A. Robert, International Law and the Human Right to Adequate Housing for Women, Two-Spirit, Trans, and Gender-Diverse People, published alongside this report

7 Office of the High Commissioner for Human Rights. (1991). [Committee on Economic Social and Cultural Rights General Comment No. 4: The Right to Adequate Housing \(Art. 11\(1\) of the Covenant\)](#). Adopted at the Sixth Session of the Committee on Economic, Social, and Cultural Rights.

8 United Nations Human Settlements Programme (UN-Habitat). (2025). [Strategic plan for the period 2026–2029 \(Pre-final draft v2\)](#)

Understood holistically, the human right to adequate housing includes the right to long-term, secure housing that is affordable, meets essential needs such as clean drinking water, provides healthy and safe living conditions, is accessible, is in a location close to other necessities like healthcare and childcare, and that allows individuals and families to maintain cultural practices and express individual identity⁹. Everyone has the right to access adequate housing without discrimination on the basis of gender, race, disability, and other grounds.

Decades of expert interpretations have built on this foundational definition of the right to adequate housing.

It is now understood to encompass safety and freedom from gender-based violence for women and gender-diverse people; autonomy and agency for people with disabilities, including any supports required to live independently; and collective security of tenure for **i communities** facing displacement, such as low-income Black and racialized communities.

i Communities: Rather than government defined communities such as municipalities, communities in this report refers to the populations best placed to design, implement and evaluate housing for their members such as those identified in the Neha Wheel.

Recognizing and respecting the agency and autonomy of rights holders is also an essential foundation for upholding the right to adequate housing. This necessitates effective participation of women, Two Spirit, Trans, and gender-diverse people of all ages and backgrounds, especially those with lived expertise, in the development, implementation, monitoring, and evaluation of policies and programs related to housing.

The realization of the right to adequate housing for women, Two-Spirit, Trans, and gender-diverse people must also be grounded in the foundational principles of human rights:

- **Universality** ensures that all individuals, regardless of gender identity or expression, are entitled to housing that is safe, secure, and appropriate to their needs.
- **Inalienability** reinforces that this right cannot be taken away or denied, even in contexts of discrimination, poverty, or systemic exclusion.
- **Interdependence** highlights the intrinsic link between housing and other rights—such as health, safety, education, and freedom from violence—demonstrating that inadequate housing undermines the full realization of other human rights.
- **Indivisibility** reminds us that rights must be upheld together; the denial of housing rights for gender-diverse communities is inseparable from broader patterns of social and economic marginalization.

These principles affirm that housing is not a privilege, but a right that belongs to everyone, without exception.

In keeping with these principles, the right to adequate housing is inextricably linked with other rights recognized and protected in international law. This includes the prohibition of racial and gender discrimination, the rights of people with disabilities, the rights of the child, and the rights of Indigenous Peoples. For instance, the Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW) obliges states to eliminate gendered discrimination in housing and property rights. Adequate housing is a necessary component of fulfilling a wide range of fundamental human rights that include rights to culture, to health, safety, education, food, and employment.

9 Office of the High Commissioner for Human Rights. (1991). [General Comment No. 4: The right to adequate housing \(Art. 11\(1\) of the Covenant\)](#).

Critically, the human right to adequate housing is not merely an aspiration. States are responsible to implement the rights guaranteed under international law, and to respect, protect, and fulfill these rights. International human rights law requires all states to take meaningful, concrete action to uphold the right to adequate housing, including:

- Exercising due diligence to prevent violations of the right to housing, including by private individuals and corporations.
- Acting proactively to ensure all people can exercise and enjoy the right to housing, without discrimination.
- Establishing effective mechanisms and processes so that if the right to housing is violated, **i rights-holders** will have access to justice.
- Promoting the human right to housing, including through public awareness and education.

i All individuals are rights-holders. Rights-holders are entitled to have their rights respected, and to be able to access fair and effective mechanisms to undo the harm caused by any rights violations they may experience.

A key dimension of these obligations, as expressly stated in the ICESCR¹⁰, is the principle of “progressive realization”. This is the duty of the state to:

- invest maximum available resources;
- use all appropriate means to fulfil the right including law and regulation;
- prioritize those in greatest need; and
- take effective measures so that the right can be fully and universally realized as soon as possible.

In any federal state, all levels of government share these human rights obligations and are each expected to act within their own jurisdictions and areas of influence. However, the federal government, as the body representing Canada in the development and adoption of international human rights standards, is understood to have particular responsibilities for upholding international law, including the responsibility to convene, coordinate, and exert influence over other levels of government.



10 United Nations. (1966). [International Covenant on Economic, Social and Cultural Rights](#). Treaty Series, 993, 3. United Nations Committee on Economic, Social and Cultural Rights. (1990). [General Comment No. 3: The Nature of States Parties' Obligations](#). Art. 2, Para. 1. United Nations Committee on Economic, Social and Cultural Rights. (1991). [General Comment No. 4: The Right to Adequate Housing](#). Art. 11(1).

CANADA'S COMMITMENT TO UPHOLD THE HUMAN RIGHT TO HOUSING FOR ALL WOMEN, TWO SPIRIT, TRANS, AND GENDER-DIVERSE PEOPLE

In 2019, after decades of advocacy by lived experts and civil society organizations, Parliament adopted the *National Housing Strategy Act* (NHSA) which explicitly affirms Canada's commitment to uphold the human right to housing as it has been defined in international law.

The Act includes a Housing Policy Declaration recognizing

"that the right to adequate housing is a fundamental human right affirmed in international law."

The Housing Policy Declaration also explicitly commits Canada to

"further the progressive realization of the right to adequate housing as recognized in the International Covenant on Economic, Social and Cultural Rights."

The preamble to the NHSA, which provides important interpretative context for its provisions, includes a number of statements about the role of the federal government in advancing the right to housing. This preamble includes the acknowledgement that

"national goals, timelines and initiatives relating to housing and homelessness are essential to improving the quality of life of the people of Canada, particularly persons in greatest need."

The NHSA requires the federal government to **"develop and maintain a national housing strategy to further the housing policy, taking into account key principles of a human rights-based approach to housing."** In developing and implementing this national housing strategy, the federal government is specifically required to **"focus on improving housing outcomes for persons in greatest need."**



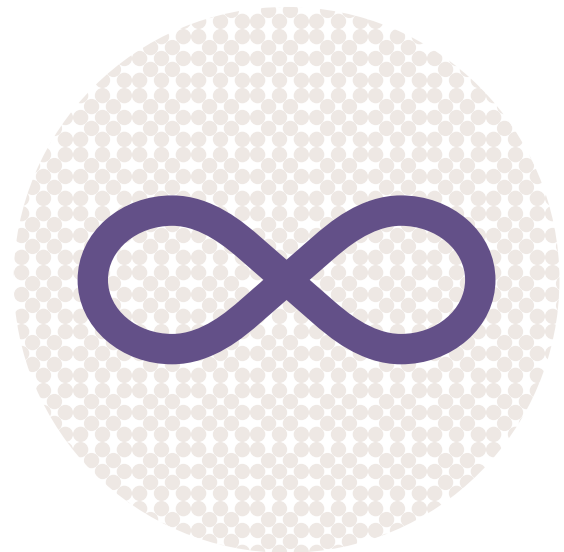
The commitments under the NHSA are indivisible from other domestic human rights commitments. These include the rights enshrined in the Charter of Rights and Freedoms, notably the right to life, liberty, and security, and the right to equal protection and equal benefit of the law without discrimination on the basis of gender, race, national or ethnic origin, age, disability, or other grounds. Provincial and territorial human rights codes explicitly prohibit discrimination in housing.

Canada's United Nations Declaration on the Rights of Indigenous Peoples Act (UNDRIP Act) affirms the application of UNDRIP in Canadian law, and instructs the Government of Canada to **"take all measures necessary to ensure the laws of Canada are consistent with the Declaration"**, in consultation and cooperation with Indigenous Peoples. Provisions of relevance to Indigenous people's individual and collective human rights related to housing include:

- Article 10, which prohibits forced removal of Indigenous peoples from their lands or territories.
- Article 20, which guarantees Indigenous peoples' right to their own means of subsistence and development.
- Article 21, which guarantees the right to improvement of economic and social conditions, including housing.
- Article 23, which guarantees the right to determine and administer programs and services, including housing.
- Articles 26-28 and 32, which set out Indigenous peoples' right to own, use, develop and control their traditional lands, territories and resources, the requirement that States recognize Indigenous land tenure systems, and the right to redress and compensation for the occupation, use, or development of Indigenous territories without their free, prior, and informed consent.

Finally, Canada's commitment to the United Nations Agenda 2030 Sustainable Development Goals (SDGs) affirms "a whole-of-government and whole-of-society effort to build stronger, safer, and more inclusive communities that **leave no one behind.**"¹¹ Progress on targets is measured by the Canadian Indicator Framework.¹² Targets of direct relevance to Neha include:

- Goal 1: No Poverty – reduce poverty by 50% by 2030, based on 2015 levels;
- Goal 5: Gender Equality – reduce the incidence of intimate partner violence and sexual assault;
- Goal 10: Reduced Inequalities – reduce gendered and racialized income disparities, and decrease rates of discrimination;
- Goal 11: Sustainable Cities and Communities – reduce the number of households in core housing need and reduce chronic homelessness by 50% by 2028.



11 Government of Canada. (2025). [Canada and the Sustainable Development Goals.](#)

12 Statistics Canada. (2025). [Canadian Indicator Framework for the Sustainable Development Goals Data Hub.](#)



The Neha Review Panel



REVIEW PANELS UNDER THE NATIONAL HOUSING STRATEGY ACT

The NHSA provides several mechanisms to ensure independent, human-rights based oversight and ongoing engagement of “civil society, stakeholders, vulnerable groups and persons with lived experience of housing need, as well as those with lived experience of homelessness.” These include an independent Federal Housing Advocate supported by the Canadian Human Rights Commission, a National Housing Council (NHC) to provide advice to the Minister responsible for housing, and review panels to examine systemic housing issues.

Under the Act, the NHC is required to appoint a review panel to hold a hearing on a systemic housing issue within federal jurisdiction when requested to do so by the Federal Housing Advocate. In appointing its members to a review panel, the Council is directed by the NHSA to consider diverse identities and lived expertise. Review panels are mandated to hold a public hearing that enables the participation of rights-holders directly affected by the issue. Review panels must submit a report to the federal Minister responsible for housing, outlining their opinions and recommendations. The Minister is required to table the report of a review panel in Parliament, and to issue a formal response within 120 days.

THE NEHA REVIEW PANEL

In 2022, two national networks, the Women’s National Housing & Homelessness Network¹³ and the National Indigenous Feminist Women’s Housing Working Group¹⁴, submitted formal claims to the Federal Housing Advocate detailing concerns about the gendered impacts of the national housing emergency. After reviewing these claims, the Federal Housing Advocate filed a request calling on the National Housing Council to establish a review panel on “the failure to prevent and eliminate homelessness amongst women and gender-diverse people.”¹⁵

In response, the National Housing Council appointed Sylvia Maracle, Marie Pascaline Menono, and Pamela Glode Desrochers to form a review panel in March 2024.

Before starting their work, the members did ceremony, sought the advice of Elders and Knowledge Keepers, and spoke to members of their communities for guidance. In order to focus on a positive vision, the members defined the issue they would examine as **“the right to safe, adequate and affordable housing for women, Two Spirit, Trans, and gender-diverse people, and the government’s duty to uphold this right.”**

The name Neha was chosen by the panel members to represent their vision of how they would fulfil their mandate. Neha is a Kanien’kéha-Mohawk word meaning **“our ways”**. The name speaks to working together, to share the land, water, animals, and the natural world. It describes a way of life that is open, peaceful, supportive, and healing. The recognition of Human Rights is in and of itself a natural concept.

Everyone was invited into the circle, including government duty-bearers, to chart a new path forward to uphold the right to housing for all women, Two Spirit, Trans, and gender-diverse people.

13 Women’s National Housing & Homelessness Network (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.](#)

14 National Indigenous Feminist Women’s Housing Working Group (2022). [Homeless on Homelands: Upholding Housing as a Human Right for Indigenous Women, Girls, Two-Spirit, and Gender diverse People. Submission to the Federal Housing Advocate.](#)

15 Federal Housing Advocate (2023). [The failure to prevent and eliminate homelessness amongst women and gender-diverse people.](#)

THE NEHA DIALOGUE PROCESS

Neha's inquiry focused on:

- The impact of the failure to uphold the right to safe, adequate and affordable housing for women, Two Spirit, Trans, and gender-diverse people, including the impact that this issue has on the progressive realization of the right to adequate housing in Canada;
- The actions and inactions of the Government of Canada (such as laws, policies, programs, regulations, recommendations, commitments, action plans, and strategies) that have led to the failure to uphold the right of women, Two Spirit, Trans, and gender-diverse people to safe, adequate and affordable housing, including the impact that these actions and inactions have on the Government of Canada's national and international commitments to housing and human rights; and
- Solutions within the jurisdiction of Parliament to address the issue and progressively realize the right to adequate housing in Canada.

i Vision, knowledge, reason, action: The Neha review panel process was modelled on the Medicine Wheel teaching, with four stages of inquiry:

- **Vision:** Articulating the vision that we are striving towards. In the case of Neha, this is the vision for safe, affordable and adequate housing for women, Two Spirit, Trans, and gender-diverse people.
- **Knowledge:** Gathering the knowledge required to work towards the vision.
- **Reason:** Seeking understanding of why things are the way they are, and how they need to change in order to realize the vision.
- **Action:** Defining the actions required to bring the vision into reality.

Between November 2024 and April 2025, Neha held a written dialogue, collecting more than 250 written submissions from individuals and organizations. Neha also conducted oral dialogues in-person and online with more than 250 lived experts, service providers, researchers, and advocates across the country (see [Appendix A](#) for an overview of the written and oral dialogues). This unique process centered rights-holders and prioritized hearing from diverse women, Two Spirit, Trans, and gender-diverse people who are often left behind in policy processes, including people experiencing homelessness; people incarcerated in penal institutions; refugee claimants; and family and survivors of missing and murdered Indigenous women, girls, and Two Spirit individuals. Partnerships with community-based organizations were integral in this effort.

Neha's companion report, "*A place where we can breathe, heal, and belong*," provides a detailed summary of the visions, knowledge, insight, and recommendations shared during this process.

Many dialogue participants identified themselves as rights holders, actively working to claim what is theirs: the right to adequate housing. They expressed a clear desire for autonomy in making decisions about their lives and families, and called on all levels of government in Canada to fulfill their legal obligations under the *National Housing Strategy Act* by meaningfully upholding the right to housing for those in greatest need.

In addition to meeting with rights holders, Neha also sought input from federal, provincial and territorial government duty-bearers, and with Indigenous governments and representative organizations. The purpose of these engagements was to better understand measures being taken to uphold and fulfill the right to adequate housing.

In response to a request from Neha, written submissions were received from Women and Gender Equality Canada (WAGE), Housing Infrastructure and Communities Canada (HICC), Indigenous Services Canada (ISC), Canada Mortgage and Housing Corporation (CMHC), and Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC). Employment and Social Development Canada (ESDC), and the members of Provincial-Territorial Forum on Housing, did not provide submissions in response to Neha's request.

To uphold transparency and accountability, written submissions from rights-holders, community-led organizations, and government agencies are published on the Neha website, along with video recordings and written summaries of oral dialogue sessions.

IT'S TIME TO MAKE THE RIGHT TO HOUSING REAL FOR ALL WOMEN, TWO SPIRIT, TRANS, AND GENDER-DIVERSE PEOPLE IN CANADA

As detailed in Neha's companion report, "*A place where we can breathe, heal, and belong*," Canada's failure to take adequate, comprehensive, and coordinated action focused on upholding the right to housing for those in greatest need, means that women, Two Spirit, Trans, and gender-diverse people from many backgrounds continue to struggle every day to survive homelessness, escape violence, and find and maintain safe and adequate housing.

Neha heard consistent accounts of women, Two Spirit, Trans, and gender-diverse people of many backgrounds who are unable to escape situations of violence and exploitation; of inadequate, inaccessible, unsafe, and exclusionary emergency shelters that are too overwhelmed and unfunded to adequately support Two Spirit, Trans, and gender-diverse people; of Indigenous, Black, and lower-income parents living in fear that their children will be taken away because they can't find or afford decent accommodations; of Two Spirit, Trans, and gender-diverse refugees fleeing violence in their home countries only to be left homeless and vulnerable in Canada; and of people with disabilities being institutionalized as a direct result of the impossibility of finding fully accessible housing.

At the same time, it is also clear that practical solutions already exist both to provide immediate relief to people living unhoused or in precarious housing situations and to advance the deeper, more transformative changes needed to end homelessness and housing insecurity. In fact, Neha heard numerous, inspiring examples of how women, Two Spirit, Trans, and gender-diverse people, and the community-led organizations that support them, are developing and implementing effective models to claim the right adequate housing for themselves and their communities.

The critical issue is whether governments at all levels are prepared to listen to the lived experts and support these solutions.



Conclusions of the Neha Review Panel



This section presents Neha's conclusions based on what was heard during the dialogue process, and submissions from government. Neha underscores that Canada's obligations under international human rights law require the progressive realization of the right to adequate housing without discrimination. Housing is not merely a commodity but a fundamental human right essential to dignity, equality, and security. Neha's findings highlight persistent gaps that disproportionately affect women, Two Spirit, Trans, and gender-diverse persons, particularly those who are Indigenous, racialized, newcomers, living with disabilities, and other marginalized groups. These gaps reflect historic and systemic factors, deepen gendered and racialized inequalities, and create harmful consequences for interconnected rights, including equality, security of the person, and protection of the family. The following conclusions outline key concerns and opportunities for Canada to strengthen housing policies and programs in line with its domestic and international human rights commitments.

3.1 WOMEN, TWO SPIRIT, TRANS AND GENDER-DIVERSE PEOPLE OF ALL AGES AND BACKGROUNDS CLAIM A HOLISTIC RIGHT TO HOUSING

“Housing is not just a roof over your head. It’s about cultural identity, healing, and the right to be seen and supported as your full self.”

– Charlotte Hunter

There are many visions of what makes a house a home.

Throughout the dialogue process, women, Two Spirit, Trans, and gender-diverse persons shared a wide range of perspectives on the meaning of home. These visions, in all their diversity, are concrete expressions of the holistic understanding of the right to housing in international law.

Key elements of this vision include:

Security and Stability: Participants shared a vision of home as a place of security and peace of mind, especially for those living on low or fixed incomes, or navigating financial instability. What was heard is a desire for housing that removes the constant fear of eviction and allows individuals to focus on living with dignity. This vision is especially urgent for racialized and Indigenous women, people living with disabilities, newcomers, and gender-diverse people who face systemic income inequities.

Health and Accessibility: Participants envisioned housing that actively supports physical and mental health, particularly for those with disabilities, those who are aging, or those who have limited mobility. Clean water, proper ventilation, heating, cooling, outdoor spaces, connections to nature, and natural light were emphasized as essential features. For caregivers and people living with disabilities, who spend extended time at home, these elements are not luxuries—they are necessities. This vision reflects the need for housing that is both accessible and affirming.

Safety, Privacy, and Belonging: Safety was described as both physical and emotional, especially by those with histories of trauma or who have escaped violence. Participants envisioned homes with privacy, secure locks, and well-lit spaces, but also communities where they can live authentically and be free from harassment. This vision is especially resonant for Indigenous and racialized communities, as well as Two-Spirit, Trans, and gender-diverse people, whose safety is often compromised by transphobia, racism, and misogyny. What was heard is a call for housing that fosters healing and affirms identity.

Cultural and Family Inclusion: Participants expressed a vision of housing that reflects the diversity of family structures and cultural practices. This includes space for extended, intergenerational, and communal living, as well as chosen families. For First Nations, Inuit, Métis, and other racialized communities, culturally appropriate housing must include space for ceremony, traditional food preparation, and gathering. What was heard is a desire for homes that honour cultural identity and support collective care and support.

Community and Autonomy: Home was described as part of a broader ecosystem of care and connection. Participants envisioned communities that offer essential services, mutual support, and opportunities for meaningful participation in decisions about housing and neighbourhoods. This vision is especially important for those who experience marginalization across multiple axes—such as racialized newcomers, people fleeing violence, and gender-diverse people—who often rely on community networks for survival and resilience. What was heard is a call for housing systems that centre rights-holder autonomy and collective well-being.

These visions of home and community shared by dialogue participants are consistent with the way that the right to housing has been defined and elaborated in international law. As set out in the introduction, international standards on the principles of universality, inalienability, equality, non-discrimination, interdependence, and indivisibility clearly imply that the right to housing is not limited to mere shelter. The right to housing cannot be separated from other human rights. Its realization contributes to the realization of all other human rights while providing the necessary conditions for people to lead healthy, safe, dignified, and fulfilling lives. It is clear from the evidence received that the most effective housing programs are those grounded in communities, and led by lived experience experts.

Despite the *National Housing Strategy Act*'s commitment to advance the right to housing in Canada, the dialogue revealed that this right remains out of reach for many women, Two Spirit, Trans and gender-diverse people across Canada. This undermines respect for the universal human rights principle of “leave no one behind.”

“I see a world where everyone has the right to a home that not only provides shelter but also nurtures their identity and well-being. My hopes and dreams are rooted in the belief that housing should be a sanctuary—a place where individuals can express themselves freely and live without fear of discrimination or violence.”

Neha affirms that the right to housing, as expressed by women, Two Spirit, Trans, and gender-diverse persons, is holistic and consistent with international human rights standards. This vision encompasses not only shelter but also safety, health, cultural identity, autonomy, and connection to community. It reflects the interdependence of housing with other rights and the essential conditions for living with dignity.

Neha encourages Canada to ensure that housing policies and programs reflect this holistic understanding and respond to the diverse realities of marginalized groups. Realizing the right to housing in this way is essential to ensuring that all individuals—regardless of gender identity, age, race, disability, or status—can access housing that supports their full and equal participation in society.

3.2 THE HOUSING CRISIS FOR INDIGENOUS WOMEN, TWO SPIRIT, TRANS, AND GENDER-DIVERSE PEOPLE IS ROOTED IN COLONIALISM

The diverse laws and traditional teachings of Indigenous Peoples in Canada – First Nations, Inuit, and Métis – express a sense of shared responsibility for kin, community, and neighbours. One participant told Neha, “First Nations people never had ‘homelessness’, everyone in the community was seen as an equal and held worth. No one was discarded or turned away.”

Colonial laws and policies have long conflicted with the original laws and teachings of Indigenous Peoples, resulting in ongoing forms of dispossession that directly impact access to housing. These include the unlawful seizure of Indigenous lands; the denial of Indigenous governments’ authority over housing decisions; and discriminatory provisions in the Indian Act that stripped First Nations women, Two-Spirit, Trans, and gender-diverse people of their status and rights. Forced assimilation programs, such as residential schools, have further disrupted Indigenous communities and their ability to secure safe, culturally appropriate housing. These legacies continue to shape housing insecurity today. For example, there are more Indigenous children in government care today than were in residential schools at their peak, most for reasons of inadequate housing and poverty.

The harms inflicted by historic laws and policies have profoundly impacted the lives of successive generations of women, Two Spirit, Trans, and gender-diverse people who are First Nations, Inuit, and Métis, contributing to homelessness and housing precarity.¹⁶

¹⁶ Neha also heard how patterns of discrimination, exclusion, and displacement rooted in colonialism continue to shape the Canadian housing system in ways that harm women, Two Spirit, Trans, and gender-diverse people of all backgrounds. These broader impacts are explored in Section 3.5.

“For Indigenous women and gender-diverse people, a home is not just shelter, but it’s also our place on mother earth, our connection to all our relatives – the animals, the birds, the fish, the plants, the trees, the water and the beings in the water, as well as our ancestral family.”

– Marie McGregor Pitawanakwat, Chair, National Indigenous Women’s Housing Network

Persistent underfunding of infrastructure and services in First Nations, Inuit, and Métis communities has led to insufficient and poor-quality housing that is poorly adapted to local needs, unhealthy and overcrowded, and lacking essential services including clean drinking water. Dialogue participants told Neha that **housing conditions in many Indigenous communities would never be considered acceptable anywhere else in Canada, leading many to leave their communities in search of adequate housing and services.** Forced migration and displacement, in turn, contribute to the overrepresentation of Indigenous women, Two Spirit, Trans, and gender-diverse people in situations of homelessness in urban, rural, and northern communities across Canada.

Neha also heard how First Nations, Inuit, and Métis living in urban centres – the majority of Indigenous people in Canada – often have limited access to culturally relevant housing programs and supports, and that what does exist is deeply underfunded. Community-led organizations providing wrap-around services with urban First Nations, Inuit, and Métis women, Two Spirit, Trans, and gender-diverse people struggle to access long-term funding, often as a result of restrictive and unrealistic eligibility requirements and gaps between federal and provincial supports.

Finally, Neha heard from community members that colonial patterns of inequity and exclusion have been reproduced within Indigenous communities. Indigenous women, Two Spirit, Trans, and gender-diverse people reported gendered exclusion from community governance, gendered exclusion from housing allocation priority, homophobic and transphobic exclusion of 2SLGBTQQIA+ community members, and barriers to First Nations women's tenure of matrimonial property. Neha also heard how colonial policies are sometimes transferred into the policies and programs delivered by Indigenous governments in areas such as child welfare and housing allocations. Finally, the impacts of colonialism are visible in the competition for inadequate federal funding between First Nations, Inuit, and Métis governing entities and urban, rural, and Northern Indigenous organizations, resulting in Indigenous entities being pitted against each other instead of working together to address **i core housing needs** of community members.

i Core housing need: Core housing need is Canada's measure for inadequate housing. It has two elements:

- Living in housing that is inadequate, unsuitable, or unaffordable , AND
- Having an income too low to afford adequate, suitable housing in the same area.

“Inuit housing problems began when the nomadic ways of life were forced into permanent settlements in the 1950's. The Federal Government provided small and poorly built “match box houses” that were overcrowded, not insulated properly and did not suit northern arctic life.”

– Pauktuutit Inuit Women of Canada

Safe, adequate, and affordable housing is key to safety for Indigenous women, Two Spirit, Trans, and gender-diverse people. In its submission to Neha, **the Aboriginal Housing Management Association wrote that although the high rates of violence facing First Nations, Inuit, and Métis women, girls, Two Spirit, Trans, gender-diverse people “has been long documented and increasingly publicized in Canada”, this awareness “has not informed the planning of housing interventions”**. The National Inquiry into Missing and Murdered Indigenous Women and Girls emphasized the importance of the right to adequate housing to preventing violence against women, girls, Two Spirit, Trans, and gender-diverse people. Ten of the Inquiry's Calls for Justice, including distinctions-based Calls for Justice for Inuit and Métis women, girls and 2SLGBTQQIA+ people, include greater access to safe, healthy, and affordable housing. Dialogue participants emphasized that housing is also a foundation to fulfillment of many of the other Calls for Justice.

The Government of Canada has made significant commitments to address these colonial legacies and their gendered impacts, including the adoption of the UN Declaration on the Rights of Indigenous Peoples Act (UNDRIPA), and commitments to fully implement the Calls for Justice of the National Inquiry into Missing and Murdered Indigenous Women and Girls and the Calls to Action of the Truth and Reconciliation Commission of Canada.

Submissions from federal departments to Neha provide updates on the implementation of these commitments, including through the First Nations Housing and Related Infrastructure Strategy, the Inuit Nunangat Housing Strategy, and the Canada-Métis Nation Housing Sub-Accord. These strategies model a new approach founded on Indigenous self-determination: they are co-developed with Indigenous partners and are based on a direct transfer model through which federal entities deliver funds directly to First Nations, Métis governments, and Inuit Treaty Organizations for self-determined housing priorities based on community-led needs assessments. The Urban, Rural, and Northern Indigenous Housing Strategy, meanwhile, is delivered through National Indigenous Community Housing Incorporated (NICHl), a representative national association of Indigenous community housing providers. Indigenous Services Canada and Treasury Board Secretariat worked with NICHl to develop a reporting framework that includes results and performance indicators with specific provisions for women and 2SLGBTQIA+ people.

While they represent significant progress, **these strategies do not provide the resources required to uphold the right to housing for Indigenous women, Two Spirit, Trans, and gender-diverse people.**

To quote one submission, “CIRNAC has not estimated the resources needed to specifically address the unmet need for adequate, safe, and affordable housing for women, Two Spirit, Trans, and gender-diverse people. The housing gaps experienced by each distinctions-based groups differ. Partners have estimated the housing gap to exceed tens of billions of dollars with additional investments required to narrow the gap. Many partners have identified the need for additional social housing, shelters and transition homes to fill the needs of women, Two Spirit, Trans, and gender-diverse people.”

Even when resources are allocated, delays impede the delivery of desperately-needed housing and services. For instance, the \$4 billion committed in Budget 2023 for the implementation of the Urban, Rural and Northern Indigenous Housing Strategy has not yet been fully allocated, with only \$281.5 million delivered to urban Indigenous housing providers through National Indigenous Collaborative Housing Inc. (NICHl).¹⁷ This has left thousands of planned units stalled, with impacts for 124,000 Indigenous households living in URN areas who are in core housing need.



¹⁷ Canadian Housing and Renewal Association. (2025). [Building with purpose: CHRA's submission to the House of Commons Standing Committee on Finance in advance of the 2026 budget.](#)

Another example of progress is the Missing and Murdered Indigenous Women, Girls, and 2SLGBTQQIA+ People National Action Plan and Federal Pathway, co-developed with First Nations, Inuit, and Métis governing entities and with Indigenous women, Two Spirit, Trans, and gender-diverse people. A key program of this strategy, the Indigenous Shelter & Transition Housing Initiative, has enabled the establishment of new shelters serving Indigenous communities across Canada, including four specifically for 2SLGBTQQIA+ community members. The Reaching Home Indigenous Homelessness and Distinctions-Based funding streams were acknowledged by some Neha dialogue participants as providing important resources using a co-development approach. At the same time, dialogue participants noted that federal policies and programs continue to focus on emergency shelters as response to violence against Indigenous women, rather than meeting the need for safe, adequate, affordable, permanent housing.

Neha observes that **despite Canada's commitments to reconciliation and Indigenous rights, significant challenges remain in addressing the housing crisis facing Indigenous women, Two Spirit, Trans, and gender-diverse persons.** The enduring impacts of colonial policies—including forced displacement, gendered discrimination, and systemic underfunding—continue to shape housing insecurity and exclusion.

While distinctions-based strategies and the Urban, Rural, and Northern Indigenous Housing Strategy represent important progress, **funding has not yet been fully released and, in many cases, remains insufficient to address deep gaps left by colonial legacies.** To quote the latest report to Parliament on progress toward implementation of the UNDRIP Action Plan, “Limited funding, capacity challenges, and fragmented implementation across departments continue to hinder progress.” This has disproportionate impacts for Indigenous women, Two Spirit, Trans, and gender-diverse people who live on- and off-community. Neha emphasizes that upholding the right to housing requires sustained investment in Indigenous-led, culturally appropriate housing solutions that reflect the lived realities and governance of Indigenous Peoples.



3.3 CANADA'S NATIONAL HOUSING STRATEGY HAS NOT FULFILLED THE NHSA REQUIREMENT THAT IT IMPROVE HOUSING OUTCOMES FOR WOMEN, TWO SPIRIT, TRANS, GENDER-DIVERSE PEOPLE IN GREATEST NEED.

The *National Housing Strategy* Act requires Canada to develop and maintain a national housing strategy “taking into account key principles of a human rights-based approach to housing.” This strategy must

- a. set out a long-term vision for housing in Canada that recognizes the importance of housing in achieving social, economic, health and environmental goals;
- b. establish national goals relating to housing and homelessness and identify related priorities, initiatives, timelines and desired outcomes;
- c. focus on improving housing outcomes for persons in greatest need; and
- d. provide for participatory processes to ensure the ongoing inclusion and engagement of civil society, stakeholders, vulnerable groups and persons with lived experience of housing need, as well as those with lived experience of homelessness.

The National Housing Strategy has significantly increased federal investment in housing for the first time in almost three decades. However, **while the NHSA requires the Strategy to focus on improving housing outcomes for persons in greatest need, this commitment is not reflected in how funding is being allocated.**

“There is little understanding within the federal bureaucracy of how to advance housing policy with a gendered lens.”

– Marie-Josée Houle, Federal Housing Advocate

The Apartment Construction Loan Program (formerly the Rental Construction Financing Initiative) is the largest program under the NHS, accounting for 40 percent of all federal NHS investments. ACLP finances private market rental construction with a requirement that 20 percent of units be “affordable” for 10 years. However, while a rights-based approach defines affordable housing as housing that costs no more than 30% of the household’s actual income – a definition supported by most submissions to Neha – the ACLP definition is based on the median income of all local households, including homeowners. This definition disproportionately disadvantages households led by women, Two Spirit, Trans, and gender-diverse people, whose average incomes are lower.

A study for the National Housing Council¹⁸, cited in several submissions to the Neha review, found that while the ACLP has had some benefit in increasing the housing stock available at below market rates, fewer than five percent of new units produced under this program could lift lone-parent families out of core housing need.

This **prioritization and overreliance on private market housing supply** in Canada is concerning since the largest share of public investment is producing housing that is not affordable, let alone adequate for those in greatest need¹⁹.

“Housing is about safety.
Housing is about security.
For Indigenous women, girls,
and Two Spirit and gender
diverse people, the absence
of adequate housing is directly
linked to vulnerability to violence,
exploitation, and loss of life.”

– Hilda Anderson-Pyrz, National Family and Survivors Circle Inc.

Indeed, public investment in private development and infrastructure has actually contributed further to the national shortage of affordable housing through financialization and the wide-spread repurposing of previously affordable units for higher market rents.

In contrast to the NHS support for private market construction, those initiatives and models that are widely viewed as having been most successful in providing supports urgently required by people in core housing need – including the Rapid Housing Initiative – are severely underfunded relative to need. Similarly, the Canada Housing Benefit is insufficient to reach all households in core housing need²⁰.

Despite the requirements of the NHSA, the specific and distinct needs of diverse women, Two Spirit, Trans, and gender-diverse people have been largely left out of the development and implementation of the National Housing Strategy. Indeed, the NHS lists, but does not prioritize housing for those in greatest need, including women, Two-Spirit, Trans, and gender-diverse. There have been no investments specifically for housing Black and racialized women. Only one out of the five federal departments that responded to Neha reported any direct engagement with 2SLGBTQQIA+ organizations over housing issues. There have been no specific needs assessments, no targets set, and no evaluations carried out in respect to the housing needs for Two Spirit, Trans, and gender-diverse people. The only gender targets are for women as an undifferentiated group.

The federal government continues to rely on data gathering methods such as the shelter-based Point in Time survey which fails to account for patterns of invisible homelessness prevalent among women, Two Spirit, Trans, and gender-diverse people meaning that their specific and varied experiences of homelessness and housing insecurity are largely invisible.

18 National Housing Council. (2023). [Analysis of affordable housing supply created by unilateral National Housing Strategy programs: A research report.](#)

19 National Housing Council. (2025). [Measuring what matters: Proposing an outcomes framework for federal housing policy](#)

20 National Housing Council. (2023). [Analysis of affordable housing supply created by unilateral National Housing Strategy programs: A research report.](#)

Participants also raised concern that monitoring of federal housing programs tracks inputs rather than results. Instead of tracking progress made in reducing core housing need and homelessness, Housing, Infrastructure and Communities Canada reports dollars spent, units built, and global number of people accessing supports. They do not report on impacts on the housing outcomes of specific populations and the tracking of NHS investments to meet the needs of women and their children includes shelter beds along with permanent housing units.

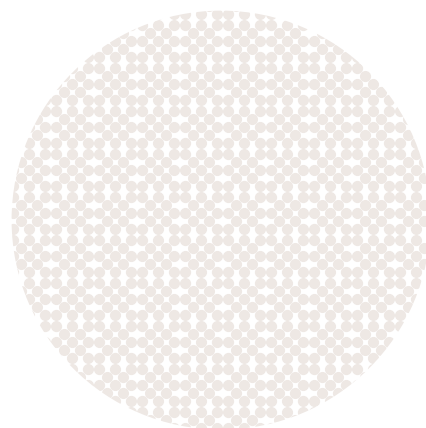
“Two-Spirit, Trans, and gender-diverse people continue to be ‘invisible’ in planning, prioritization, and allocation of housing resources.”

– South Asian Legal Clinic and South Asian Legal Clinic of Ontario

Furthermore, the rights-based approach to housing set out in the NHS Act has not been well-integrated across federal departments with responsibilities for housing. For instance, the NHS Act commitment to advance the progressive realization of the right to housing is not acknowledged as an objective in housing policies.

Neha heard repeated concerns about the **lack of coordination among federal departments and across jurisdictions**. Lack of integration of Canada’s human rights obligations across all relevant departments contributes to a fragmented and inconsistent approach to meeting the needs of diverse women, Two-Spirit, Trans, and gender-diverse people throughout their lives. Strengthening coordination is essential to advancing Canada’s stated commitments under the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP) and the *National Housing Strategy Act*, and to addressing systemic gaps that hinder the progressive realization of the right to adequate housing.

Neha also heard many examples of conflicts between the eligibility criteria, priorities, and processes through which the federal and provincial governments fund housing initiatives. These conflicts can result in available funds not reaching the community-led organizations best placed to identify and meet the diverse housing needs of women, Two Spirit, Trans and gender-diverse persons.



Neha concludes that the National Housing Strategy is not fulfilling its legislated requirements under the NHSA to advance the progressive realization of the human right to adequate housing.

This failure is reflected in several critical gaps:

Not investing all available resources: Despite evidence presented by civil society of the costs savings of providing housing with **i community-based supports** to address core housing need, billions of dollars have been misdirected into the private market. Even where funds have been committed to community-led housing, delays in allocation have hampered delivery, as shown in the example of the URN Indigenous Housing Strategy discussed in section 1.2. This reflects a lack of alignment of legislation and housing policy focused on the right to adequate housing and national housing priorities and funding allocation.

Absence of clear targets and accountability: NHS initiatives lack measurable targets, timelines, and evaluation frameworks to ensure they are effectively addressing the housing needs of diverse women, Two Spirit, Trans, and gender-diverse people of all ages living in diverse urban, rural and northern settings. The NHS set a target of lifting 300,000 households out of core housing need, yet most of its programs are not designed to meet the needs of this group. Accountability is unclear for the NHS target of reducing chronic homelessness by 50%²¹.

Significant data gaps and lack of intersectional analysis: The absence of comprehensive and disaggregated data makes it difficult to accurately identify and understand the specific housing needs of marginalized populations. This data gap, coupled with the lack of a costed estimate of housing needs, is often cited as a justification for inaction—hindering evidence-based policy development and preventing holistic GBA+ analysis. As a result, the right to adequate housing of diverse women, Two-Spirit, Trans, and gender-diverse people continues to be overlooked.

Limited meaningful participation of rights-holders:

There is insufficient involvement of affected communities in the design, implementation, and evaluation of housing programs. This not only undermines the human rights principles of effective participation, inclusion, and equity, it also limits programs' effectiveness and risks wasting resources.

i Community-based or wrap-around supports:

Voluntary, holistic supports tailored to individual needs. A diverse range of housing types and wraparound supports were recommended by participants in the Neha dialogues such as healthcare, cultural supports, food security, childcare, harm reduction and safe consumption, employment and vocational training, financial literacy, mental health services, personal care, substance use treatment, family unification, primary care, education, life skills training, spiritual care, legal services, immigration support services, leadership training, and accessibility supports, among others.

Fragmented governance: The absence of a coherent and coordinated approach across federal departments and jurisdictions results in inconsistent and ineffective responses to the housing emergency experienced by women, Two Spirit and gender-diverse people. Indeed, housing cannot be considered in isolation of other departments that oversee health, corrections, immigration, women & equity, etc.

Not leveraging previously successful housing models:

Many housing solutions have been generated by communities to address housing crisis faced by women, Two Spirit, Trans, and gender-diverse people from different backgrounds, yet there are few federal programs to support scaling and adaptation of these successful models.

These gaps have contributed to the NHS falling short on its targets of reducing chronic homelessness by 50% and lifting 300,000 households out of core housing need.

21 In 2022, [an Auditor General report](#) found that there was minimal federal accountability for achieving this target.

With the renewal of the NHS and the launch of Build Canada Homes, there is an opportunity to apply these lessons in order to ensure that federal housing policies and programs uphold their obligation to advance the right to safe, adequate, and affordable housing for women, Trans, Two Spirit, and gender-diverse people.

The federal submissions to Neha demonstrate areas of strength to build on:

Meaningful engagement with affected communities:

Initiatives such as the development and implementation of the 2SLGBTQI+ Action Plan by WAGE; the Community Advisory Boards established to oversee allocation of local Reaching Home funds; and the Persons With Lived Experience (PWLE) Advisory Table established by HICC; offer models for the effective, rights-based participation of rights-holders and civil society throughout the policy process.

Co-development with Indigenous peoples: As discussed above, federal housing initiatives have made significant progress on upholding Indigenous rights through direct funding transfers to support self-determined priorities.

Commitment to GBA+ analysis across federal policies: With the support of WAGE as a centre of excellence, federal departments have expanded capacity to embed GBA+ analysis into housing policies and programs.

Evidence-based, community-led needs assessments and monitoring,

such as those under Reaching Home, were cited as a positive practice and offer a practical model that can be adapted to other housing programs.

Coordination across departments to advance human rights commitments:

Departments reported on horizontal policy initiatives including the Indigenous Shelter and Transitional Housing Initiative, which is associated with government-wide commitments related to the prevention of violence against and increasing safe spaces for Indigenous women, children, families, and 2SLGBTQIA+ people, in response to the Truth and Reconciliation Commission Calls to Action and the Calls for Justice of the National Inquiry into Missing and Murdered Indigenous Women and Girls.

Coordination with other orders of government

via bilateral agreements in areas of shared jurisdiction – such as the National Action Plan to End Gender-Based Violence and National Housing Strategy.

3.4 GENDERED AND RACIALIZED INCOME INEQUITIES SHUT WOMEN, TWO SPIRIT, TRANS AND GENDER-DIVERSE PEOPLE OUT OF SAFE, ADEQUATE HOUSING.

“I can’t believe that people still speculate why women, Two Spirit, Trans, and gender-diverse people stay in dysfunctional and often violent relationships. The answer is simple: first there has to be housing to move into and second you need to have an adequate income in order to afford to live in that housing.”

— written submission to Neha

In recent years, it has become harder and harder for individuals and families living on low or fixed incomes to obtain adequate housing. Indeed, **insufficient wages and income supports contribute to housing unaffordability** because they have not kept up with sharp rises in housing costs across Canada or with the overall increase in costs of living. An estimated 69% of people in Canada who rely on minimum wage, social assistance, or other benefits are in core housing need²².

Poverty is both gendered and racialized. Census data shows disproportionate rates of poverty for Indigenous women, women with disabilities, Trans women, and non-binary people, women who have recently immigrated to Canada, women heading lone parent families, and women aged 65 and older²³. For many women, Two Spirit, Trans, and gender-diverse people living across the country, the result is a nearly insurmountable barrier to accessing safe and adequate housing for themselves and their families.

In a submission to Neha, the Office of the Pay Equity Commissioner noted that women wage earners in Canada on average make 13% less than men, with “racialized women, women who are newcomers, women with disabilities, Indigenous women, transwomen and others from the 2SLGBTQ+ communities” experiencing an even larger, intersectional wage gap.

22 Whitzman, C. (2023). [A human rights-based calculation of Canada's housing supply shortages](#). Office of the Federal Housing Advocate.

23 LEAF. (2023). <https://www.leaf.ca/wp-content/uploads/2023/08/Gender-and-Poverty-Backgrounder.pdf> Gender and poverty backgrounder.

During the COVID-19 pandemic, there was a temporary but significant reduction in the number of households in core housing need, something that has been largely attributed to the Canada Emergency Response Benefit and other benefits provided as part of the emergency response. With this temporary exception, however, it is clear that current income supports are not enough for people with low income, with disabilities, lone parents, refugees, older adults, full time caregivers and others to afford safe, adequate housing. Social assistance and disability benefits are below the poverty line in every province and territory. Neha also heard accounts that when individuals are eligible for multiple benefits and supports, the claw back of income supports contributes to the unaffordability, especially for women, Two Spirit, Trans and gender-diverse people who are more likely to rely on income supports.

“I can never feel settled and live in fear every day that I will lose the current social housing that I waited 12 years to obtain.”

– written submission to Neha

Comparing average income to average rents, the Pay Equity Commissioner found that **most women** in Canada would have to spend approximately **59% of their monthly income on rent. For women with disabilities**, the percentage of income required to meet rental costs climbs to **83%**.

The amount of available rent-geared-to-income housing falls far short of need, resulting in long wait lists. Neha heard accounts of families waiting so long for housing that children have grown from infants to teenagers while the family remained on the waiting list. Furthermore, even when lower income individuals and families can access rent-geared-to-income housing, low income and high cost of living still creates challenges in balancing the cost of rent and meeting other basic needs.

The insufficient supply of deeply affordable community housing leaves low-income women, Two Spirit, Trans, and gender-diverse people to obtain what housing they can in the private market, facing them with trade-offs between safety, accessibility, habitability, location, suitability, and other elements of adequate housing.

Dialogue participants described unhealthy and unsafe conditions such as mold and pests; fear of scrutiny from child welfare authorities because of the size or condition of their housing; inaccessible housing that kept them trapped in their homes or impeded activities of daily living; and long commutes to work, daycare, and grocery shopping because of inadequate locations. Options in the private market are even narrower for women, Two Spirit, Trans, and gender-diverse people across generations who experience compounded discrimination on the basis of being Black, racialized, Indigenous, immigrants, refugees, 2SLGBTQQIA+, disabled, young, older, or other grounds.



Neha also heard about the specific struggles of refugees and asylum seekers who have come to Canada to escape homophobic and gender-based violence. On arrival, many encounter a lack of specialized services, and are required to spend months in a shelter while waiting for a work permit. Even when they can enter the job market, many struggle to earn decent wages or find a place to rent when they don't have Canadian rental references, employment history or credentials.

Submissions to Neha consistently emphasized that **the gap between income and the cost of housing keeps many women, Two Spirit, Trans, and gender-diverse people dependent on partners and family members, or trapped in unsafe housing situations.** Neha heard from many dialogue participants who were forced to remain in abusive relationships because they could not afford a safe alternative. The human rights claim submitted by WNHHN provides evidence that the end of a relationship or cohabitation arrangement is one of the most prevalent precursors of housing loss for women, Two Spirit, Trans, and gender-diverse people, demonstrating the extent to which they rely on sharing housing costs.

Neha notes that there are areas where progress has been made and positive models established. For example, Canada's Poverty Reduction Strategy has made meaningful progress on reducing child and family poverty through the Canada Child Benefit (CCB). The CCB is also a positive example of coordination between the federal, and provincial-territorial governments (PTs) to exempt the CCB from clawback by PT social assistance programs. The Canada Housing Benefit has helped households in core housing and provides another example of federal, provincial, and territorial coordination.

Despite these areas of progress, Neha finds that **income inequality remains a major barrier to housing affordability for women, Two Spirit, Trans, and gender-diverse people.** These inequities intersect with race, disability, and newcomer status, increasing vulnerability to housing insecurity.

Neha emphasizes that Canada has both the responsibility and capacity to ensure that individuals have sufficient income to afford safe, adequate housing without sacrificing other basic needs. **Addressing income inequality is essential to fulfilling human rights and reducing housing insecurity for marginalized communities.**



3.5 FEDERAL POLICIES AND PROGRAMS DO NOT ADEQUATELY ADDRESS INTERSECTING, SYSTEMIC BARRIERS FOR WOMEN, TWO SPIRIT, TRANS, AND GENDER-DIVERSE PEOPLE WHO ARE INDIGENOUS, RACIALIZED, NEWCOMERS, AND LIVING WITH DISABILITIES

“Those of us who are Black, Indigenous, racialized, disabled, 2SLGBTQIA+ persons, newcomers, gender-diverse, or multiply-marginalized suffer the most in the current housing market, but housing programs often do not reflect our needs or realities.”

– Women’s National Housing and Homelessness Network

These diverse housing needs and challenges require specific solutions, not one-size-fits all housing programs.

Neha heard specific accounts of the barriers facing Indigenous, Black, racialized, and immigrant people seeking housing suitable for larger families and intergenerational living, or where they can host visiting family and friends. Federal funding programs such as the Rapid Housing Initiative prioritize building the maximum number of units, without consideration of the need to fund units of different sizes and configurations to accommodate different living needs. This is referred to as “per door” funding. **The housing design catalogue created by CMHC as a tool to ease the approval process, and therefore accelerate new residential housing, fails to include blueprints for housing suitable for large and extended families, intergenerational living, or communal living.**

Women, Two Spirit, Trans, and gender-diverse people all have differing housing needs and face different challenges in finding housing that is safe, affordable, and suitable to those needs. In addition to gender, housing needs and challenges are also shaped by multiple other dimensions of identity, such as being First Nations, Inuit, or Métis, Black, a member of other racialized communities, an immigrant or refugee, a person with disabilities, a lone parent, a youth, or an older adult.

Neha also heard about ways in which housing policies and programs based on colonial, Eurocentric, and heteronormative definitions of gender and family make it harder for women, girls, Two Spirit, Trans, and gender-diverse people from many backgrounds to find housing that meets their needs. Canada's National Occupancy Standards (NOS) define suitability based on a limited set of criteria primarily related to the number, age, and gender of children and single adults in the family.

While the NOS was intended to serve only as a guideline, many participants shared that the lack of effective tenant protections in Canada results in the NOS often being applied rigidly in ways that deny families a choice to live in accommodations that they consider suitable according to their values and traditions.

Neha heard that many women, Two Spirit, Trans, and gender-diverse people attempting to flee abuse are often forced to leave their homes due to not being named on the lease or deed, which is reinforced by matrimonial property ownership on First Nations.

Consistent concerns were also expressed over the failure to ensure housing options for people with disabilities, consistent with Canada's human rights obligations. Effectiveness of accessibility requirements under NHS programs has been limited, while accessibility requirements of the National Building Code are narrow in scope, applying only to the common areas of new multi-unit residential buildings.

In addition, as stated by YWCA Moncton, Saint John Human Development Council and Crossroads for Women in their joint submission, **the 2019 Accessible Canada Act “does not currently apply to most housing providers, leaving a significant gap in the application of consistent accessibility standards.”** Available government subsidies to renovate existing properties to make them more accessible generally provide reimbursement only after the costs have already been paid by the homeowner, which is a significant financial barrier for many people needing accessible housing.

The severe shortage of accessible housing makes it much harder for women, Two Spirit, Trans, and gender-diverse people with disabilities to live independently. It also means that it is much harder for older women, Two Spirit, Trans, and gender-diverse people to remain housed if their mobility is reduced or they experience other forms of disability as they age.

A number of participants also talked about harmful impacts of municipal planning norms, often entrenched in by-laws and zoning regulations, that separate residential neighbourhoods from other essential aspects of life including work opportunities, healthcare, childcare, groceries, and community and cultural centres. These norms, reflective of specific cultural values and assumptions, impose costs for transportation that disproportionately impact people with lower incomes and contribute to greater social isolation for people with limited mobility. More generally, these planning norms act as a barrier to building more complete communities, which is part of how many women, Two Spirit, Trans, and gender-diverse people define home.



Many lived experts and community-led organizations described the importance of holistic community-based supports in helping women, Two Spirit, Trans, and gender-diverse people remain housed.

The supports identified by participants varied widely, reflecting the diversity of needs and experiences. For example, participants shared diverse contexts in which emergency financial supports, life skills training, legal assistance, harm reduction supports, and childcare are each critical.

Many also emphasized the importance of ensuring that participation in any support program was always voluntary. Women, Two Spirit, Trans, and gender-diverse people may have reasons not to want to participate in particular programs. This should not be a barrier to fulfilling their right to housing.

Participants also described significant challenges in accessing the supports they do want and need. In many communities, emergency shelters are the primary contact for accessing wrap-around supports. However, women, Two Spirit, Trans, and gender-diverse people are often turned away from overwhelmed gender-based violence shelters, or they may be unable to access these shelters because their experience of violence does not fall within the shelter's mandate. Those who may be excluded include youth who have left home because of harassment and abuse based on their gender identity. Neha also heard consistent concerns of how **the binary division of emergency shelters into “men’s shelters” and “women’s shelters” means that the shelter system is unsafe and unwelcoming for Two Spirit, Trans, and gender-diverse people.**

Neha also heard about **many challenges related to service navigation**, affecting participants' ability to find out about available supports and establish eligibility.

Participants described having to fill out multiple, lengthy, and sometimes traumatizing application forms for each agency or organization that provides some of the supports they need.

Participants questioned why access couldn't be better coordinated to reduce the burden on people in greatest need.

Women, Two Spirit, Trans, and gender-diverse people who are dependent on the private market experience widespread discrimination. Neha heard consistent accounts of landlords openly refusing to rent to families with young children. Neha also heard first-hand testimony from rights holders who understood that the reason they were refused an apartment was because they are Trans, Two Spirit, or gender-diverse, or are Indigenous, Black, from racialized communities, newcomers, living with disabilities, or receiving income supports.

Women, Two Spirit, Trans, and gender-diverse people escaping dangerous and exploitative living conditions often cannot provide the documentation typically required by landlords. Neha heard examples of people whose only rental history or credit records were tied to someone who had abused or exploited them. Evidence was also provided that some landlords demand more documentation from Indigenous, Black, and racialized people than from other applicants.

Reflecting **the ineffectiveness of tenant protections across Canada**, available mechanisms to file complaints against landlords and address discriminatory practices are widely seen as difficult to access, slow, and lacking the power to hold landlords accountable in a way that would either deter discrimination or address the harm that has been caused.

Federal department submissions to Neha provide some evidence of intersectional analysis of diverse gendered housing needs. Examples include the inclusion of priority groups in the National Housing Strategy; the commitment to GBA+ analysis across all policies and programs; and the acknowledgement of housing as a key area of need in the 2SLGBTQI+ Action Plan; and the establishment of 2SLGBTQQIA+-specific shelters through the Indigenous Shelter and Transitional Housing Initiative. Yet these initiatives are limited in scope, lacking the effectiveness of an intersectional, coordinated response to assess and address the diverse housing needs of women, Two Spirit, Trans, and gender-diverse people across the life cycle. For example, funding to community organizations under the 2SLGBTQI+ Action Plan is insufficient to enable them to address the housing needs of low-income Two Spirit, queer and Trans community members.

Neha concludes that federal housing policies and programs do not consistently address the intersecting and systemic barriers faced by women, Two Spirit, Trans, and gender-diverse persons who are Indigenous, Black, racialized, newcomers, and persons with disabilities. These groups experience disproportionate housing insecurity due to discriminatory practices, inaccessible housing design, rigid occupancy standards, and limited culturally appropriate and community-led housing options.

Neha encourages Canada to adopt a rights-based, intersectional approach to housing policy that reflects diverse lived realities. This includes ensuring meaningful participation in program design, eliminating discriminatory barriers in the private rental market, and investing in inclusive, accessible, and permanent housing solutions that uphold dignity and autonomy.



3.6 SYSTEMIC GAPS IN THE RIGHT TO HOUSING FOR WOMEN, TWO SPIRIT, TRANS, AND GENDER-DIVERSE PEOPLE CONTRIBUTE TO CHILD APPREHENSION, INSTITUTIONALIZATION, AND CRIMINALIZATION.

Neha heard repeated accounts from women, Two-Spirit, Trans, and gender-diverse people about being placed in institutions—such as child welfare services, emergency shelters, hospitals, long-term care homes, and correctional facilities—that fail to meet the essential elements of the right to adequate housing. **These patterns of institutionalization are driven by systemic income inequalities and the lack of access to housing with community-based supports.** Indeed, the one-size-fits-all approach used in market housing ignores culture, ability and family differences which perpetuate the institutionalization of women, Two Spirit, Trans and gender-diverse people who are Indigenous, Black, racialized, newcomers, older, or differently abled.

Neha heard testimony about parents being reluctant to access housing programs and services that they need, including emergency shelters, out of fear that doing so would draw the attention of child protection agencies. Neha also heard that **national standards set by government, such as the National Housing Occupancy Standard, make it harder to reunify families once a child has been taken.** Parents explained that access to certain benefits, and to rent-geared-to-income housing large enough for families, is based on the number of children in a person's care at the present moment. When a child is taken into care, housing eligibility changes, which can result in immediate homelessness. It can also make it nearly impossible for the parent to afford or access housing that would be suitable under the National Housing Occupancy Standards to have their child returned to their care.

Child Apprehension

Neha heard that children are being taken from their families and placed into the care system due to their housing conditions being deemed inadequate. Dialogue participants pointed out that a rights-based – and more humane – response is needed to provide better supports so that children's needs can be met within their families and communities. These patterns of child apprehension are particularly concerning given a context of historic and ongoing high rates of First Nations, Inuit, Métis and Black children in care.

While costs vary across Canada, one 2024 report estimated that **the government could save \$14,600 per family** by providing housing with community-based supports to reduce family involvement with the child welfare system²⁴. Since there are tens of thousands of families in Canada involved with the child welfare system, it is imperative that the government take action to make more efficient use of public dollars and to uphold the right to adequate housing.

24 Chapin Hall. (2024) [Cost savings from investing in children and families](#).

Shelters

Reliance on the emergency shelter system is not a substitute for upholding the right to safe, adequate, and secure permanent housing. Yet Neha heard that for many who are unhoused or experiencing violence, shelters are often the only available option. Shelters, however, are rarely designed to meet the unique housing needs of women, Two-Spirit, Trans, and gender-diverse people as shelters are often under-funded, overwhelmed, and serve large regional areas, including in northern and Indigenous communities, where there are often no shelters at all. As such, Neha participants often described shelters as discriminatory, exclusionary, culturally inadequate and inaccessible.

Neha heard how co-ed shelters are often unsafe for women, Two Spirit, Trans, and gender-diverse people. For example, Neha heard that the binary division of emergency shelters into “men’s shelters” and “women’s shelters” means that the shelter system is often unsafe and unwelcoming for Two Spirit, Trans, and gender-diverse people, including youth who have left home because of harassment and abuse based on their gender identity. The Federal Housing Advocate’s work on housing accessibility also demonstrates that there is a deficit of shelters that meet accessible standards, despite people with disabilities being four times more likely to experience homelessness than those without disabilities²⁵. Finally, Neha heard that eligibility requirements to access gender-based violence shelters vary across jurisdictions leaving many women, Two Spirit, Trans and gender-diverse people unable to access a gender-based violence shelter because their experience of violence does not fall within the shelter’s mandate.

Each year, approximately 119,574 people use emergency shelters in Canada²⁶ - among them are many women, Two-Spirit, Trans, and gender-diverse individuals who are Indigenous, survivors of violence, people with disabilities, newcomers or single parent families. For example, in 2022/2023, there were 60,965 admissions to shelters whose primary mandate is to serve victims of abuse²⁷. We heard through the Neha dialogues, that shelter use is especially common among youth who cannot be reunited with their families, including those who have aged out of the child welfare system. Similarly, we heard that homelessness is most common amongst 2SLGBTQIA+ youth (approximately 25-40% of the youth experiencing homelessness are members of the 2SLGBTQIA+ community)²⁸.

One Statistics Canada report from 2011 estimated that it costs approximately \$49,640 per year to provide a bed in an emergency shelter²⁹. In the same year, housing with community-based supports were estimated to cost approximately \$11,497 to \$35,902 per person per year³⁰. This cost disparity highlights the need for government action to uphold the right to adequate housing by moving towards housing with community-based supports rather than institutionalized systems.

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- 25 Canadian Human Rights Commission. (2024). [Homelessness – Monitoring the right to housing for people with disabilities](#).
- 26 Statistics Canada. (2025). [Exiting homelessness: An examination of factors contributing to regaining and maintaining housing](#).
- 27 Statistics Canada. (2024). [Residential facilities for victims of abuse, 2022/2023](#). (Catalogue No. 85-002-X).
- 28 Canada Mortgage and Housing Corporation. (2022). [2SLGBTQIA+ housing needs and challenges](#).
- 29 Canada Mortgage and Housing Corporation. (2021). [Homeownership by race](#).
- 30 Gaetz, S. (2012). [The real cost of homelessness: Can we save money by doing the right thing?](#)

Hospitals & Long-Term Care

Neha heard many accounts of how the severe shortage of genuinely accessible housing is leading to increased reliance on long-term care homes and hospitals as the only alternative to homelessness for growing numbers of people with disabilities and older adults. **Hospitals and long-term care homes, however, do not uphold the right to adequate housing.** Neha heard from many Two, Spirit, Trans, and gender-diverse people who testified that it is often unsafe to express their identities when forced into these institutional settings. Older adults shared their specific fears of being moved into long-term care homes and their inability to age-in-place without access to community services. This reliance on institutionalization as a response to housing then leads to a wide range of rights violations including but not limited to the right to adequate housing.

While costs vary across Canada, in Ontario it costs the government more than \$213 per day to house a single person in long-term care³¹ and \$500 per day in hospital³². In contrast, providing housing with community-based supports for the same population costs between \$60 and \$100 per day³³, depending on the level of care required. This significant cost disparity underscores the urgent need for government action to uphold the right to adequate housing. By transitioning from costly institutional care to more effective housing solutions with community-based supports, Canada can advance its commitment to housing as a human right. This shift would enable the creation of accessible housing options tailored to the needs of women, Two-Spirit, Trans, and gender-diverse people—ensuring equity, dignity, and stability for those in greatest need.



31 Government of Ontario. (2025). [Long-term care homes level-of-care per diem funding summary](#).

32 Ontario Hospital Association. (2024). [Ontario hospitals – Leaders in efficiency \(2nd ed.\)](#).

33 Government of Ontario. (2020). [Ontario expands funding for supportive housing](#).

Incarceration

Neha heard powerful first-hand accounts of the ways that **homelessness and housing insecurity can lead to criminalization and incarceration**. People living unhoused or in precarious housing situations often face heightened surveillance and are at greater risk of negative interactions with police. Several currently incarcerated participants shared that they had committed petty crimes either to afford housing or under coercion from individuals they relied on for shelter.

Neha learned that upon release, many women, Two-Spirit, Trans, and gender-diverse people experience **hidden homelessness**—staying temporarily in unsafe or unstable housing situations. In some instances, some participants reported being criminally charged simply for residing in the home of someone who had previously been arrested.

Hidden homelessness: Temporary living arrangements, such as staying with family or friends, that do not provide long term housing security. This form of homelessness is described as ‘hidden’ because it is excluded from common methods used to measure homelessness and housing insecurity and because people living in these temporary arrangements, are often cut off from services and supports meant to address homelessness. Evidence indicates that hidden homelessness is particularly prevalent for women, Two Spirit, Trans, and gender-diverse people, especially those who are Indigenous, from racialized communities, are newcomers, are disabled, or are youth.

Neha also heard how involvement in the criminal justice system disrupts both employment and tenancy—two critical factors in securing rental housing. Lived experts shared stories of losing their homes while awaiting release, and emphasized that demonstrating access to stable housing is often a prerequisite for early or conditional release. Women, Two-Spirit, Trans, and gender-diverse people who are currently incarcerated expressed that there is a lack of available transitional housing options that are suitable, and that little support is provided to help them secure safe, appropriate housing upon release.

Without secure housing, these participants explained, it becomes much harder to avoid cycles of behaviour that lead to parole violations and re-incarceration. Indeed, these stories reveal the deeply cyclical relationship between homelessness and incarceration, and the systemic barriers faced by women, Two Spirit, Trans and gender-diverse people released into homelessness, who are at **greater risk of recidivism** (people experiencing homeless are 11x more likely to reoffend³⁴).

In Canada, it costs approximately \$314/per day to house the average person who is incarcerated³⁵. In comparison, promising examples suggest it would cost approximately \$60-\$100/per day per person to provide housing with community-based supports to the same population³⁶. By shifting from costly incarceration to housing with community-based supports, Canada can uphold its commitment to housing as a human right, while ensuring public dollars are being spent effectively.

Neha is deeply concerned that the lack of safe, affordable, and suitable housing is forcing women, Two-Spirit, Trans, and gender-diverse people into institutional systems where their rights are further compromised. Once institutionalized, it becomes even harder to access adequate housing for themselves and their families.

34 John Howard Society of Canada. (2025). [Federal Framework to Reduce Recidivism](#)

35 Office of the Parliamentary Budget Officer. (2018). [Costing federal carbon pricing policy](#).

36 Gouda, S. (2022). [Society receives \\$1 million in supportive housing for men exiting correctional facilities](#).

These examples of prioritizing institutional responses—child apprehension, shelters, hospitals, long-term care, incarceration—over safe, affordable housing with appropriate supports reflects a fundamental misalignment in how governments understand and fund the right to housing for those in greatest need. Despite extensive evidence demonstrating the cost-effectiveness of transitioning from institutions to community-based housing (see [Appendix B](#)), this approach remains underfunded and largely ignored.

Neha’s findings indicate that gaps in housing access and supports lead to serious and compounding consequences, including institutionalization, child apprehension, incarceration, and exclusion from essential services—particularly for those facing intersecting forms of marginalization. **Institutional responses are not a substitute for housing; they often exacerbate vulnerability, stigma, and harm and are inconsistent with Canada’s human rights commitments, including under the Convention on the Rights of the Child and the Convention on the Rights of Persons with Disabilities.**

Neha urges Canada to **take immediate measures to redirect public resources from costly institutional systems toward inclusive, community-based housing solutions that are Indigenous-led, gender-responsive, and culturally appropriate.** Coordinated action across jurisdictions and dismantling structural barriers are essential to ensuring housing systems uphold dignity and equality.

Neha notes the opportunity to leverage existing interdepartmental and interjurisdictional mechanisms such as comprehensive interdepartmental reviews, the Federal-Provincial-Territorial (FPT) Housing Forum, and interjurisdictional funding agreements. Federal action can also build on examples of coordination across departments and jurisdictions, such as the MMIWG2S+ Action Plan, the National Action Plan to End Gender-Based Violence, and bilateral agreements in areas of shared jurisdiction like the National Action Plan to End Gender-Based Violence and the National Housing Strategy.



4

Recommendations



“We need transformational action now.
Lives literally depend on it.”

– Diane Redsky, MMIWG2S+ Urban Indigenous Action Group

Realizing the vision of safe, adequate, and affordable housing for women, Two Spirit, Trans, and gender-diverse people in Canada begins with upholding human rights.

The right to adequate housing is interdependent with women's rights, the human rights of Indigenous Peoples, 2SLGBTQIA+ rights, disability rights, the right to health, the rights of the child, and other human rights Canada has enshrined. These human rights commitments include an immediate responsibility to address the discriminatory impacts of its programs and practices, and to prevent urgent threats to life and dignity such as homelessness. In addition, governments are required to exercise due diligence to prevent harm to groups known to be at high risk of violence and exploitation, such as First Nations, Inuit, and Métis women, girls, and gender-diverse people; Two Spirit, Trans, and gender-diverse people of all backgrounds; people with disabilities; and people living unhoused or in precarious housing situations.

The *National Housing Strategy* Act commits Canada to advance the progressive realization of the right to adequate housing. This entails prioritizing those in greatest need, devoting the maximum available resources, using all appropriate means, and implementing effective measures to fully realize the right as quickly as possible.

Yet, despite these commitments, **Canada is not treating housing like a fundamental human right.** Federal housing policies have failed to adequately assess or prioritize the urgent needs of women, Two Spirit, Trans, and gender-diverse people of all backgrounds and ages. Gender- and equity-based targets and measurement are lacking. Effective programs remain underfunded relative to need. While some recent initiatives demonstrate progress, evidence presented to Neha underlined the lack of commitment, cohesion, and coordination across departments and jurisdictions to uphold the right to housing for women, Two Spirit, Trans, and gender-diverse people, especially those most marginalized.

In submissions and dialogues, rights-holders provided evidence of the disproportionate and compounding impacts of homelessness, inadequate housing, income inequalities, and systemic discrimination for women, Two Spirit, Trans, and gender-diverse people, especially those who are Indigenous, Black, racialized, immigrants and refugees, living with disabilities, parents and other

caregivers, youth, and older adults. The consequences include dangerous and unhealthy living conditions, exposure to violence and exploitation, child apprehension, incarceration, institutionalization, lasting harms to physical and mental health, intergenerational trauma, and loss of life.

Urgent action is needed now. **Canada's current economic conditions are intensifying the risks for the most disadvantaged groups.** It is more critical than ever to learn from past missteps—particularly the misallocation of housing resources. With the renewal of the National Housing Strategy, the launch of Build Canada Homes, and unprecedented commitments of federal lands and resources to housing and infrastructure, there is an opportunity to chart a new course by integrating the human right to housing across federal priorities.

A human rights-based approach will advance Canada's economic goals and global competitiveness. Reallocating resources to prioritize those in greatest need is not only a human rights obligation, it is also a sound economic strategy. Enabling effective participation of rights holders throughout budget and policy cycles not only upholds their fundamental rights, it also makes investments more effective. Ensuring that all women, Two Spirit, Trans, and gender-diverse people have access to safe, adequate, and affordable housing not only protects their rights and dignity – it also breaks the vicious cycle of costly institutional responses, and secures the well-being of future generations.

The way forward is marked by the federal government leading the coordination of policies, programs, and regulatory mechanisms to realize the right to adequate housing for all women, Two Spirit, Trans and gender-diverse people across the life span in all areas of Canada.

These claims and responsibilities are woven through the recommendations that follow.

RECOMMENDATION 1.

Transform Canada's colonial housing system to uphold the right to housing for Indigenous peoples.

Neha's vision of the right to adequate housing includes the urgent need to uphold the collective and individual human rights of First Nations, Inuit, and Métis. This includes the right of Indigenous Peoples to determine and control their own housing and social programs, and Canada's responsibility to ensure access to a wide range of housing options that are culturally appropriate. It requires commitment to housing Indigenous people wherever they live, whether on community or in urban, rural, and northern centres.

In contrast, dialogue participants shared their experiences of underfunded housing systems and inadequate standards in Indigenous communities and urban settings; exclusion of Indigenous women, Two Spirit, Trans and gender-diverse people from governance of housing policy; and the challenges that First Nations, Inuit and Métis governing entities and Indigenous-led organizations face in accessing resources controlled by the federal, provincial, and territorial governments. Canada's human rights responsibilities require the federal government to work collaboratively with Indigenous Peoples to:

- a. **Uphold and expand funding commitments to the Urban, Rural, and Northern (URN) Indigenous Housing Strategy.**
 - Deliver the remaining committed URN Indigenous Housing Strategy funding through National Indigenous Collaborative Housing Inc. to ensure timely and equitable access to housing for the majority of Indigenous people, who live in urban, rural, and Northern centres.
 - Implement the recommendations from the National Housing Council report on URN³⁷ to guide evidence-based policy and investment.
 - Establish dedicated funding to help Indigenous housing providers transition from expiring Urban Native Housing operating agreements and protect deeply affordable housing³⁸.
 - Include all Indigenous-led non-profits that provide housing and wrap-around supports in policy and program development.

37 National Housing Council. (2021). [National Urban, Rural & Northern Indigenous Housing & Homelessness: A Case for Support and Conceptual Model](#).

38 Aboriginal Housing Management Association. (2025). [Written Submission for the Pre-Budget Consultations in Advance of the Upcoming Federal Budget](#).

b. **Uphold and expand funding commitments to the distinctions-based First Nations, Métis and Inuit housing strategies.**

- Collaborate with Indigenous governing bodies and national Indigenous women's and Two Spirit organizations to estimate and allocate funding that addresses the gendered housing and infrastructure needs in First Nations, Métis settlements, and Inuit Nunangat.
- Commit \$425 billion to close the Indigenous housing and infrastructure gap, including \$75.1 billion for Inuit Nunangat, in recognition of Indigenous rights and the right to adequate housing³⁹.

c. **Prioritize Indigenous women, Two Spirit, Trans, and gender-diverse people in federal policies and programs.**

- When disposing of federal lands and buildings, grant right of first refusal to First Nations, Inuit treaty organizations, Métis governments, national Indigenous women's organizations, and urban, rural, and northern Indigenous organizations to meet the housing needs of Indigenous women, Two Spirit, Trans and gender-diverse people.
- Fund Aboriginal Housing Management Association's Indigenous Youth Housing Strategy⁴⁰ which promotes For Indigenous Youth, By Indigenous Youth (FIYBIY) housing models, including housing and community-based supports for 2SLGBTQQIA+ persons.
- In alignment with the 231 Calls to Justice from the National Inquiry into Missing and Murdered Indigenous Women and Girls⁴¹, create targeted funding streams within federal programs to support and permanently house Indigenous women, girls, and 2SLGBTQQIA+ people fleeing violence.

d. **Uphold Indigenous self-determination, respect Indigenous data sovereignty, and enable exercise of jurisdiction over housing, lands, and social programs.**

- Maximize the impact of public investment by ensuring that federal housing investments meet the needs of Indigenous people wherever they live—on-reserve, in Inuit Nunangat, Métis settlements, and urban, rural, and Northern communities.
- Fund Indigenous housing via direct transfers to First Nations, Métis governments, Inuit Treaty Organizations, and Indigenous representative organizations, for use on self-determined priorities. Ensure equitable access to funding for smaller and lower-capacity communities.
- Support Indigenous governing entities and Indigenous representative organizations to conduct gender-based, community-led data collection for housing needs assessments and outcome reporting. Build on successful models such as the Bridging Across Canada Database created by the National Association of Friendship Centres, and the Housing Census conducted by Métis Nation of Ontario. Use Indigenous-owned data to drive resource allocation & program development.
- Promote collaboration across all levels of government to implement the Calls for Justice of the National Inquiry into Missing and Murdered Indigenous Women and Girls (MMIWG2S+) and the Calls to Action of the Truth and Reconciliation Commission.

39 Inuit Tapiriit Kanatami. (2023). [Inuit Tapiriit Kanatami Annual Report 2023-2024](#).

40 Aboriginal Housing Management Association. (2025). [Indigenous Youth Housing Strategy](#).

41 The National Inquiry into Missing and Murdered Indigenous Women and Girls. (2019). [Reclaiming Power and Place: The Final Report of the National Inquiry into Missing and Murdered Indigenous Women and Girls](#).

RECOMMENDATION 2.

Fund and equip community-led organizations to house and support their members.

Rights-holders told Neha that they are seeking safe, adequate, and affordable housing in complete communities with social infrastructure and community-based services. **Experience has shown that this vision is best realized by organizations that are based in, represent, and are led by diverse communities.** For generations, community-led organizations have found ways to fulfill the housing and service needs of their members despite scarce resources. By contrast, federal programs focused on expanding market supply have failed to deliver housing that is affordable and suitable for women, Two Spirit, Trans, and gender-diverse people in core housing need.

Limited public resources should be invested in the most effective solutions. Community-led housing organizations and those providing wrap-around supports can only scale these promising solutions if they are provided with the necessary resources and technical assistance to design and deliver housing initiatives. Build Canada Homes' emphasis on scale and speed risks leaving behind women-led, Indigenous-led, and other community-based organizations, hampering the effectiveness of these investments. Upholding Canada's human rights obligations requires funding and equipping community-based solutions. This means:

- a. **Partner with community-led and Indigenous organizations focused on gender and equity to lead housing initiatives.**
 - Design programs accessible to community-led organizations, not just large developers, to advance inclusive and community-driven housing and supports.
 - Provide technical supports, tools and resources to Indigenous and community-led organizations to acquire, develop, and manage housing tailored to their specific needs.
 - Enable portfolio approaches and other mechanisms to build shared capacity among non-market providers.
 - Meaningfully engage rights holders and the organizations that represent or serve them in the planning, implementation and evaluation of federally funded housing in their communities. Build on successful models such as the Community Advisory Boards under Reaching Home.



b. **Invest the maximum available resources in a timely manner to enable Indigenous and community-led housing.**

- Prioritize Indigenous, public, non-profit, co-op, and other non-market housing supply, and de-prioritize programs focused on market-based supply that do not address core housing need.
- Ensure responsible stewardship of public funds, by developing a costed estimate of the resources required to meet the unmet housing needs of women, Two Spirit, Trans and gender-diverse people to improve future budget allocations.
- Create lasting impact, by providing long-term, flexible funding to deliver community-led housing and supports that respond to communities' unique needs and priorities. Eliminate short-term project funding cycles that divert organizations' focus from their core mission and prevent continuous capacity-building.
- Establish dedicated funding streams within all federal housing programs to protect and adequately house women, Two-Spirit, Trans, and gender-diverse people.
- Maximize the impact of budget commitments through rapid and efficient delivery of funds to community and Indigenous providers, building on successful models such as the Rapid Housing Initiative and National Indigenous Collaborative Housing Inc.

c. **Prioritize housing with community-based supports identified by communities themselves.**

- Pair federal capital funding with provincial, territorial, and municipal funding commitments for community-based supports.
- Expand federal capital funding and financing programs for affordable housing to include costs of non-residential space for community-based wrap-around supports and other non-profit community infrastructure.



RECOMMENDATION 3.

Provide inclusive emergency and transitional supports for diverse women, Two Spirit, Trans, and gender-diverse people facing violence and homelessness, while committing to permanent housing.

When women, Two Spirit, Trans, and gender-diverse people shared their visions of the right to housing, they described homes that are permanent and secure. Many said that in their vision for the future, there would be no need for emergency shelters. Shelter provided on a temporary basis is not adequate housing and is not a substitute for upholding and fulfilling the right to adequate housing for all. Indeed, all forms of homelessness, including hidden homelessness, are a violation of the right to adequate housing. Nonetheless, as long as Canada's housing system fails to meet the needs of all women, Two Spirit, Trans, and gender-diverse people, emergency shelters and transitional housing provide an indispensable safeguard for the right to life, health, and safety. Yet Neha heard that even these options of last resort are sometimes inaccessible, exclusionary, unavailable, culturally inappropriate, and unsafe. To ensure that this protection and support is accessible to all women, Two Spirit, Trans, and gender-diverse people without discrimination or exception, all shelters and transitional housing must be inclusive, accessible, and culturally safe. At the same time, the federal government has a responsibility to support communities to transition away from reliance on emergency shelters through long-term solutions consistent with the right to housing.

a. **Guarantee access to inclusive, accessible and culturally safe shelters and transitional housing for all—including families, refugees, Two Spirit, Trans and gender-diverse individuals, people with disabilities and survivors of violence.**

- Establish a gender-based funding stream within Reaching Home to equitably fund the provision of gender-inclusive, accessible, trauma-informed and culturally safe shelters and transitional housing for women, and for Two Spirit, Trans, and gender-diverse people.
- Renew and adequately support the National Action Plan on Gender-Based Violence and the Indigenous Shelter and Transitional Housing Initiative.
- Expand support for shelters and transitional housing provided by and for 2SLGBTQIA+ communities.
- Establish a coordinated National Refugee Housing Strategy⁴² that integrates the Resettlement Assistance Program and Interim Housing and Assistance Program to prioritize sustainable transitional housing models and equitable access for women, Trans and gender-diverse refugees, refugee claimants, and asylum seekers.

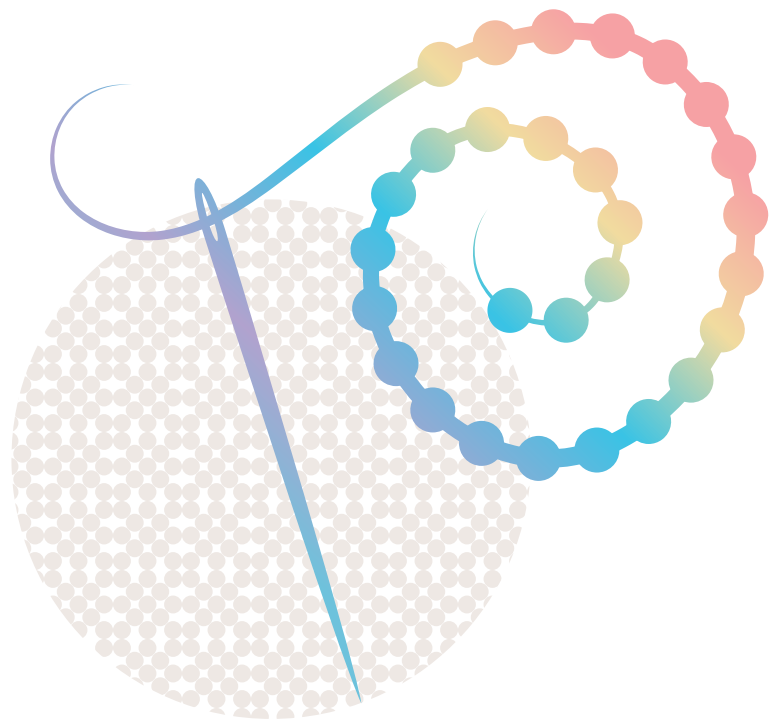
42 Sivarajah, A., Mares, E., Padi, F., Hussein, J. & Anand, P. (2024). [Advocating for refugees' right to adequate housing.](#)

b. **Ensure that all shelters and transitional housing are accessible, culturally adequate, inclusive and provide community-based supports.**

- Make gender inclusivity, accessibility, cultural adequacy, trauma informed and community-based supports a condition of bilateral agreements with PTs under the Gender-Based National Action Plan, and in funding agreements with community entities under Reaching Home.
- Provide capital funding for renovations to make shelters safe, accessible, gender inclusive and culturally adequate to respond to the diverse needs of all women, Two Spirit, Trans and gender-diverse people.

c. **Develop and support the implementation of a national road map to transition from reliance on emergency shelters to the provision of safe, adequate housing.**

- Provide targeted resources, funding, and technical support to municipalities, community-led and Indigenous organizations to facilitate their transition toward providing permanent housing with supports—delivering significant long-term cost savings compared to ongoing reliance on temporary emergency services.
- Remove homelessness and shelters from federal definitions of the housing continuum. Homelessness is not part of the housing continuum, it is an outcome of violations of the right to adequate housing.



RECOMMENDATION 4.

Fulfill the right to affordable housing and an adequate standard of living for diverse women, Two Spirit, Trans, and gender-diverse people.

Canada has made human rights commitments to uphold gender equity, non-discrimination, and the right to an adequate standard of living, including adequate housing. Yet women, Two Spirit, Trans and gender-diverse people continue to be shut out of safe, adequate housing because of gendered and racialized income disparities. There are two dimensions to making housing truly affordable. The first is substantially increasing the overall amount of genuinely affordable housing – and the diversity of these housing options – in all communities across Canada. The second is ensuring that women, Two Spirit, Trans, and gender-diverse people of all backgrounds have access to sufficient income to afford safe, adequate, and appropriate housing without compromising other necessities of life.

a. **Clearly define affordable housing supply targets for the lowest income groups, and support only those projects that guarantee long-term affordability.**

- Include a standard, income-based definition of affordability across all federal housing agencies and in agreements with other jurisdictions.
- Identify a shared target of 100,000 deeply affordable housing annually (geared towards those in the two lowest income quintiles), of which 25-40%⁴³ is committed to households led by women, Two Spirit, Trans and gender-diverse people.
- Seek a pan-Canadian commitment at the FPT Housing Forum to ensure that at least 20%⁴⁴ of the total housing stock in Canada consists of non-market housing by 2055.
- Require that all federally funded and financed rental units remain affordable in perpetuity.

b. **Increase incomes to support housing stability and uphold the right of diverse women, Two Spirit, Trans, and gender-diverse people to social security and an adequate standard of living.**

- As part of the National Housing Strategy renewal, expand the Canada Housing Benefit to support all households in core housing need.
- Increase federal benefits such as the Canada Child Benefit and Canada Disability Benefit.
- Make federal transfer payments to PTs conditional on increasing minimum wages, social assistance, and disability benefits and restricting **income claw-backs** of income supports.
- Implement a guaranteed livable basic income⁴⁵ as a step toward addressing the income disparities experienced by women, Two Spirit, Trans and gender-diverse people.

i Income claw-back: A situation where government-provided financial assistance—such as disability benefits, social assistance, or housing subsidies—are reduced or taken away when a person receives additional income or support from another source. This approach results in keeping the total income received at or below poverty levels, which contributes to housing being unaffordable, especially for women, Two Spirit, Trans and gender-diverse people who are more likely to rely on income supports.

43 Women's National Housing & Homelessness Network. (2025). [Written submission for Build Canada Homes – Market Sounding Guide](#).

44 Canadian Human Rights Commission. (2024). [What we heard: Non-market housing as a solution to the housing crisis](#).

45 Pate, K. (2025). [Why a Guaranteed Livable Basic Income?](#); National Advisory Council on Poverty. (2025). [We can do better: it is not a safety net if the holes are this big – the 2025 Report of the National Advisory Council on Poverty](#).

RECOMMENDATION 5.

Establish human rights-based standards across jurisdictions Neha Review Panel

Canada's human rights obligations are national in scope. The federal government has a unique responsibility to ensure that right to adequate housing is consistently upheld by all orders of government. Canadian law and policy should consistently prioritize, protect, and fulfill the right to housing of women, Two Spirit, Trans, and gender-diverse people of all backgrounds, no matter where they live. The federal government must use all appropriate means, including its negotiating powers, to ensure that provincial, territorial, municipal, and Indigenous governments uphold the right to adequate housing. This will require the federal government to:

a. **Exercise leadership on human rights through conditionalities in federal funding transfers.**

- Require that governments at all levels uphold human rights, women's and 2SLGBTQQIA+ rights, and tenant rights in their housing and homelessness policies.
- Require governments at all levels to engage the meaningful and effective participation of diverse women, Two Spirit, Trans, and gender-diverse people, and their civil society organizations, in the development, implementation, monitoring, and evaluation of housing and homelessness policies and programs.

b. **Establish common targets, timelines, and outcome-based metrics that are rooted in human rights, including Indigenous rights.**

- Seek a pan-Canadian commitment at the FPT Housing Forum to integrate common human rights- and gender-based targets, measurable indicators, and timelines into the Housing Policy Framework to improve housing outcomes of women, Two Spirit, Trans and gender-diverse people.

- To do so, build on recommendations from the Federal Housing Advocate and National Housing Council⁴⁶.
 - Require a fulsome GBA+ analysis in the design, implementation and tracking of all housing policies and programs, based on coordinated collection of disaggregated administrative data.
 - Make federal transfer payments to provinces and territories conditional on fulfilling these targets and timelines.
 - Require public reporting from sub-national governments on human rights-based, equity-based, gender-based, and Indigenous targets for all federal funding transfers for housing, health, social programs, and wrap-around services.
- c. **Seek a pan-Canadian commitment at the FPT Housing Forum to protect tenants from discrimination, require accessible housing, and uphold security of tenure.**
- Embed national, human rights-based standards for tenant protections and rent control into the Housing Policy Framework to protect women, Two Spirit, Trans and gender-diverse people of all backgrounds from discrimination, exploitation, and other human rights violations.
 - Establish regional protection measures to prevent the exclusion of families from housing programs on the basis of National Occupancy Standards.
 - Expand accessibility requirements for new residential construction by amending the National Building Code and PT building codes.
 - Make federal transfers under NHS bilateral agreements conditional on fulfilling these protection measures.

46 National Housing Council. (2025). [Measuring what matters: Proposing an outcomes framework for federal housing policy](#) & Whitzman, C. (2023). [A human rights-based calculation of Canada's housing supply shortages](#).

RECOMMENDATION 6.

Reduce the use of costly institutional systems by increasing access to safe, adequate, and affordable housing for women, Two Spirit, Trans, and gender-diverse people across the life cycle.

Throughout the review panel process, rights holders and civil society organizations have described a vicious cycle in which the lack of safe, adequate, and affordable housing and supports results in involvement in institutional systems such as child welfare, corrections, long-term care, hospitals, and shelters. Women, Two Spirit, Trans, and gender-diverse people in institutional settings experience violations of their fundamental rights to dignity, autonomy, and security of the person. Institutional involvement, in turn, heightens the risk of homelessness and inadequate housing. Neha also heard about increasing trends of involuntary institutionalization as a response to homelessness and substance use. Meanwhile, the high and growing cost of institutional interventions diverts public resources from providing safe, adequate, and affordable housing and services. Canada's human rights obligations require effective, targeted interventions to meet core housing needs and break the cycle of institutionalization.

This means Canada must:

- d. **Role model the reallocation of federal investments from institutions to homes by redirecting funding from emergency and transitional housing toward permanent, safe, adequate, and affordable housing.**
 - As per recommendation 3c, co-develop a roadmap to redirect federal funding from emergency and transitional housing toward community-led safe, adequate and affordable housing with community-based supports.
 - Fund, and scale, proven community-based housing models that have demonstrated cross-sector impact and can be replicated nationally.
- e. **Coordinate with other federal departments and jurisdictions to support the redirection of federal funding from institutions toward safe, adequate and affordable housing.**
 - Conduct a study on the total social and economic cost, including costs to human rights, of relying on institutional interventions rather than housing with community-based supports.
 - Complete a comprehensive review of the cross-government cost savings that could be achieved by redirecting funding from child welfare, corrections, emergency shelters, hospitals and long-term care, to housing with community-based supports.
 - Develop an interdepartmental and intergovernmental plan to redirect federal funding from institutions toward safe, adequate, and affordable housing with supports.



Final Word

Neha asked participants in the dialogue sessions to share their most important message for decision makers. Many spoke about the urgency of immediate, meaningful action to meet the housing needs of women, Two Spirit, Trans, and gender-diverse people of all backgrounds across the country. Others pointed out that the equitable solutions so urgently needed have already been identified in studies, reports, and recommendations presented to government for decades. Many had taken part in previous government consultations, only to witness little to no meaningful change. They expressed the hope that this time would be different.

Another recurring theme was the need for government officials to educate themselves on the challenges facing people experiencing core housing need, and to get to know lived experts from marginalized communities and the organizations that support them. And finally, many emphasized that the federal government has a clear legal obligation to take the measures needed to uphold the rights of all women, Two Spirit, Trans, and gender-diverse people, without exception or discrimination. To quote one lived expert: **“We are not your charity. We are not looking for your benevolence. We are rights holders who are protected by legislation. We are demanding that these laws be enforced.”**

The six recommendations presented by Neha offer a clear and comprehensive roadmap to uphold the right to housing for diverse women, Two Spirit, Trans, and gender-diverse people of all backgrounds and all ages, across Canada. The question remains:

Will government listen and deliver on this change that has long been called for?



Glossary

2SLGBTQQIA+: Two Spirit, lesbian, gay, bisexual, trans, queer, questioning, intersex, asexual, and other sexual and gender-diverse individuals and communities.

Communities: Rather than government defined communities such as municipalities, communities in this report refers to the populations best placed to design, implement and evaluate housing for their members such as those identified in the Neha Wheel.

Community-based or wrap-around supports: Voluntary, holistic supports tailored to individual needs. A diverse range of housing types and wraparound supports were recommended by participants in the Neha dialogues such as healthcare, cultural supports, food security, childcare, harm reduction and safe consumption, employment and vocational training, financial literacy, mental health services, personal care, substance use treatment, family unification, primary care, education, life skills training, spiritual care, legal services, immigration support services, leadership training, and accessibility supports, among others.

Community-led organization: An organization that is led by, represents, and serves communities directly affected by inadequate housing and homelessness. Examples include gender-based violence shelters, women's centres, Indigenous friendship centres, community land trusts, lived expert led organizations, refugee reception centres, Black-led organizations, multi-service neighbourhood centres, tenant associations, faith-based organizations, 2SLGBTQQIA+ community centres, immigrant-serving organizations, and cultural community associations.

Core housing need: Core housing need is Canada's measure for inadequate housing. It has two elements:

- Living in housing that is inadequate, unsuitable, or unaffordable ⁴⁷, AND
- Having an income too low to afford adequate, suitable housing in the same area.

Hidden homelessness: Temporary living arrangements, such as staying with family or friends, that do not provide long term housing security. This form of homelessness is described as 'hidden' because it is excluded from common methods used to measure homelessness and housing insecurity and because people living in these temporary arrangements, are often cut off from services and supports meant to address homelessness. Evidence indicates that hidden homelessness is particularly prevalent for women, Two Spirit, Trans, and gender-diverse people, especially those who are Indigenous, from racialized communities, are newcomers, are disabled, or are youth.

⁴⁷ For definitions of unsuitable, unaffordable and inadequate housing: Statistics Canada. (2024). [Core housing need in Canada](#)

Income claw-back: A situation where government-provided financial assistance—such as disability benefits, social assistance, or housing subsidies—are reduced or taken away when a person receives additional income or support from another source. This approach results in keeping the total income received at or below poverty levels, which contributes to housing being unaffordable, especially for women, Two Spirit, Trans and gender-diverse people who are more likely to rely on income supports.

Lived expert: A person with lived experience of systemic housing issues such as homelessness, inadequate housing, and gender-based violence. Lived expertise is indispensable to realizing the right to housing. In keeping with the disability rights principle of Nothing About Us, Without Us, human rights law mandates governments to ensure meaningful, ongoing engagement and leadership of people directly affected in the development, implementation, monitoring, and evaluation of housing policies.

Right to adequate housing: Adequate housing is recognized as a human right in international law. In 2019, Canada passed the *National Housing Strategy Act* to advance the human right to housing in Canada.

Housing must meet specific criteria to be considered adequate. It must:

- Provide security of tenure, so that its occupants have legal protection from eviction and can choose how long they want to stay;
- Be affordable, so that the cost of housing doesn't interfere with access to other basic needs such as food and transportation;
- Be accessible to meet the needs of people with disabilities and marginalized groups;
- Be in safe and healthy condition, and large enough for the household living there;
- Have access to services and infrastructure such as drinking water, electricity, heat, cooling, and communications technology;
- Be in an appropriate location with access to transit, employment, education, health and social services, and protected from environmental hazards;
- Be culturally appropriate for the occupants' way of life.

Everyone in Canada has a right to access adequate housing without discrimination or abuse, and to live in peace, security, and dignity in their home.



Rights-holders, duty-bearers, and responsibility-holders:

All individuals are rights-holders. International law also recognizes certain collective rights such as the right to self-determination that are held nations or peoples. Rights-holders are entitled to have their rights respected, and to be able to access fair and effective mechanisms to undo the harm caused by any rights violations they may experience. Rights-holders are entitled to information about their rights and the available mechanisms or processes to protect these rights. Rights holders are also entitled to organize, to advocate for and claim their rights, and to participate in public processes where their rights may be impacted.

Governments and government agencies are the ultimate duty-bearers, responsible not only for respecting human rights, but also for taking all measures necessary to protect against rights violations, providing effective mechanisms to address any violations that do occur, and working proactively, and to the fullest extent of their resources, to ensure every person can fully enjoy their rights.

International law recognizes that upholding human rights is a shared responsibility. All individuals, organizations, institutions, and corporations have the responsibility to respect human rights by taking every reasonable precaution necessary to ensure that their actions don't violate or undermine the rights of others.

Vision, knowledge, reason, action:

The Neha review panel process was modelled on the Medicine Wheel teaching, with four stages of inquiry:



Vision

Articulating the vision that we are striving towards. In the case of Neha, this is the vision for safe, affordable and adequate housing for women, Two Spirit, Trans, and gender-diverse people.



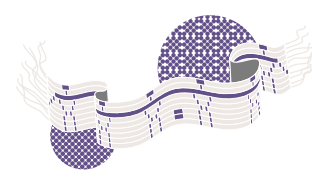
Knowledge

Gathering the knowledge required to work towards the vision.



Reason

Seeking understanding of why things are the way they are, and how they need to change in order to realize the vision.



Action

Defining the actions required to bring the vision into reality.

Women, Two Spirit, Trans, and gender-diverse people: The Neha Panel understands that women, Two Spirit, Trans, and gender-diverse people of all origins encompass a diversity of identities across the life span. The “Neha Wheel”, an adaptation of the Medicine Wheel teaching, depicts the diversity within and among these groups. The phrase “women, Two Spirit, Trans, and gender-diverse people” in this report refers to diverse identities, including: First Nations, Inuit, and Métis; Black and racialized people; people living with all types of disabilities; immigrants and refugees; people of all ages from infants to elders; people with and without children; people of diverse sexual orientations and gender identities; people living on low-income; people living in urban, rural, and Northern areas; survivors of violence and human trafficking; sex workers; people with lived and living experience of all forms of homelessness; people who use substances; people who have been incarcerated and institutionalized; veterans; and all others at risk of being left behind, from coast to coast to coast.

Visual Glossary & Legend

This report combines visual elements that reflect the values, teachings, and relationships guiding the Neha Review Panel.

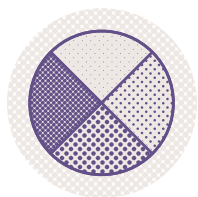
Each design choice was made with care to honour the voices of those who contributed, to represent the diversity of Indigenous Nations and identities across Turtle Island and Inuit Nunangat, and to symbolize unity, responsibility, and connection. The following symbols and visual references are included to help readers understand the meaning behind the imagery throughout the report.



Woman's Nomination Belt: The Woman's Nomination Belt symbolizes the guiding role of women and clan mothers in selecting leaders for the well-being of the whole community. It represents responsibility, balance, and decision-making grounded in care for future generations. Its presence in the design honours women's leadership and collective action; the spirit of "what we heard" and what must now be done.



Two Row Wampum: The Two Row Wampum reflects the shared relationship between distinct paths. The three white beads represent trust, friendship, and respect between nations. In this context, it speaks to the mutual accountability between governments and communities, and the commitment to walk together in upholding the right to housing.



Medicine Wheel: The Medicine Wheel reflects a holistic understanding of wellbeing, encompassing physical, emotional, mental, and spiritual balance. Its four colours and directions remind us that healing, housing, and human rights are interconnected and continuous. The Medicine Wheel is also inclusive of the many Nations, peoples, and places it represents. Each region and culture brings its own teachings and interpretations, all connected through shared values of balance and respect.



First Nation, Inuit, and Métis Elements: Multiple symbols and motifs are used throughout the report to acknowledge First Nation, Inuit and Métis Nations and their relationships to land, culture, and resilience. These symbols also represent guidance and interconnection across Turtle Island and Inuit Nunangat.



Water and Roots: Water and roots speak to the deep connections that bind us all. Roots carry the teachings of our ancestors; the histories, kinship, and strength that ground us. Water holds memory and knowledge, flowing through time and across cultures. Together, they remind us that all peoples, Indigenous and non-Indigenous, are connected through the land. Every voice, story, and home is intertwined in shared responsibility and care.

Appendix A: Neha written & oral dialogues

WRITTEN DIALOGUE

The Neha review panel received 257 written submissions, including:

- 207 individual submissions
- 48 organization submissions
- 1 submission from the Federal Housing Advocate
- 1 submission from the Women's National Housing & Homelessness Network (WNHHN)

1. Individual submissions to the written dialogue

Neha received 207 individual submissions from across Canada. Submitters shared their perspectives based on their own experience of inadequate housing and homelessness, on their work, and on research. No individual submissions were received from Manitoba, Prince Edward Island, Nunavut and Yukon.

Province/Territory	Number of Submissions
Blanks	6
Alberta	16
British Columbia	47
New Brunswick	7
Northwest Territories	5
Nova Scotia	4
Ontario	115
Quebec	2
Saskatchewan	5

2. Organization submissions to the written dialogue

A total of 48 organizations prepared submissions for the Neha review panel. The submission from the Women's National Housing & Homelessness Network is added to this list, but is considered a distinct submission originating from one of the claimants behind the Federal Housing Advocate's request to establish this panel.

The following list indicates the names of these organizations and their geographic coverage.

Number	Name of organization	Province or Territory
1	Business and Professional Women of Canada (BPW Canada)	Alberta
2	E2S - Edmonton 2 spirit Society	Alberta
3	Norfolk Housing Association (NHA)	Alberta
4	The Women's Centre of Calgary	Alberta
5	Women's Housing and Homelessness Network (WNHHN) and the National Indigenous Women's Housing Network (NIWHN) - Edmonton Sharing Circle	Alberta
6	Aboriginal Housing Management Association	British Columbia
7	BC Poverty Reduction Coalition	British Columbia
8	BC Society of Transition Houses and the Balanced Supply of Housings	British Columbia
9	Downtown Eastside Women's Centre	British Columbia
10	Group submissions: Living in C/ommunity, Kamloops Sexual Assault Counselling Centre, Yukon Status of Women Council, Ending Violence Association of BC, SWAN Vancouver, ASK Wellness, Tamitik Status of Women, Salal Sexual Violence Support Centre, Peers Victoria Resource Society, Ishtar Women's Resource Society, and Victoria Sexual Assault	British Columbia
11	Salish Lelum Housing Society/TLAFC	British Columbia
12	The Peer-to-Peer Community Co-op	British Columbia
13	West Coast Legal Education and Action Fund Association ("West Coast LEAF") & Society for Narcotic and Opioid Wellness ("SNOW")	British Columbia
14	MMIWG2S+ Urban Indigenous Action Group	National
15	National Right to Housing Network	National
N/A	Women's National Housing & Homelessness Network (WNHHN)	National
16	Metis National Council, Metis Nation of Ontario and Metis Nation of Alberta	National
17	Pauktuutit Inuit Women of Canada	National

Number	Name of organization	Province or Territory
18	YWCA Moncton in collaboration with Saint John Human Development Council, Crossroads for Women	New Brunswick
19	Newfoundland Aboriginal Women's Network	Newfoundland and Labrador
20	Advocacy Centre for Tenants Ontario (ACTO)	Ontario
21	Business and Professional Women (BPW) Ontario	Ontario
22	Campaign 2000: End Child and Family Poverty	Ontario
23	Canadian Association of Elizabeth Fry Societies	Ontario
24	Canadian Centre for Housing Rights (CCHR)	Ontario
25	Canadian Centre for Women's Empowerment	Ontario
26	Canadian Centre to End Human Trafficking	Ontario
27	Canadian Civil Liberties Association	Ontario
28	Citizen for Public Justice	Ontario
29	City for All Women Initiative (CAWI)	Ontario
30	Congress of Aboriginal Peoples	Ontario
31	Disability Justice Network	Ontario
32	Elizabeth Fry Society of Northwestern Ontario	Ontario
33	Ganohkwasra Family Assault Support Services	Ontario
34	National Indigenous Collaborative Housing Inc.	Ontario
35	National Right to Housing Network and Alliance to End Homelessness Ottawa	Ontario
36	Office of the Pay Equity Commissioner	Ontario
37	Ontario Native Women's Association	Ontario

Number	Name of organization	Province or Territory
38	Project Willow YWCA-CJI-CMW	Ontario
39	Social Rights Advocacy Center	Ontario
40	South Asian Legal Clinic of Ontario	Ontario
41	The 519	Ontario
42	This Is Not Home	Ontario
43	Women's Housing Planning Collaborative of Hamilton Ontario (WHPC)	Ontario
44	YWCA Canada	Ontario
45	The Native Council of Prince Edward Island	Prince Edward Island
46	Front d'action populaire en réaménagement urbain (FRAPU)	Quebec
47	Native Womens' Shelter of Montreal	Quebec
48	Regroupement des centres d'amitié autochtones du Québec (RCAAQ) et de la Société immobilière du RCAAQ (SIRCAAQ),	Quebec
49	Réseau des Tables régionales de groupes de femmes du Québec (RTRGFQ)	Quebec
50	Table des groupes de femmes de Montréal	Quebec

3. Government submissions to the written dialogue

As part of its evidence-gathering process, the Neha Review Panel invited written submissions from federal departments and organizations, and from other governments. The submissions received in response to this request are published here.

Government submissions provide important information on government actions and inactions in relation to the right to safe, adequate and affordable housing for women, Two Spirit, Trans, and gender-diverse people. The submissions were prepared in response to questions provided by Neha and complement the testimony gathered through Neha's written and oral dialogues.

Government Submissions:

1. Crown-Indigenous Relations and Northern Affairs Canada
2. Canada Mortgage and Housing Corporation
3. Housing Infrastructure and Communities Canada
4. Indigenous Services Canada
5. Women and Gender Equality Canada

ORAL DIALOGUES

1. Virtual dialogues

From June 16 to August 6, the Neha review panel held 7 virtual dialogues (including 6 livestreamed) with a total of 71 participants including the Federal Housing Advocate, the National Indigenous Women's Housing Network, Women's National Housing and Homelessness Network, people with lived experience, service providers, researchers, advocates and people living in Quebec. These 7 sessions were focused on key issues related to the right to housing for women, Two Spirit, Trans and gender-diverse people:

- Session 1: Federal Housing Advocate, National Indigenous Women's Housing Network, Women's National Housing and Homelessness Network
- Session 2: Safe, permanent housing for survivors of gender-based violence
- Session 3: Gender-inclusive housing for Two Spirit, Trans, and gender-diverse people
- Session 4: Adequate housing for families, preventing child apprehension
- Session 5: Safe, adequate and accessible housing to meet the diverse needs of all people with disabilities
- Session 6: Housing to address the MMIWG2S+ crisis, decolonizing housing policy
- Session 7: The inclusive realization of the right to adequate housing so that no one is left behind

2. In-person and local dialogues

National Conferences

In February 2025, the Neha review panel conducted oral dialogues in-person at events hosted by partner organizations:

- Missing and Murdered Indigenous Women, Girls and Two-Spirit (MMIWG2S+) Urban Indigenous Action Group (UIAG) National Summit, Ottawa, 100 participants, February 4 2025.
- Pan-Canadian Voices for Women's Housing (PCVWH) Symposium, Toronto. 50 participants, February 20 and 21, 2025.

Local dialogues

In August, Neha convened 4 dialogues in partnership with local non-profit organizations working with impacted communities. Partners were selected based on groups, regions, and issues under-represented in written dialogue:

- Women, Two Spirit, Trans and Gender-Diverse People Incarcerated in Provincial and Federal Institutions, Nova Scotia, 35 participants, June 4 & 5, 2025.
- Rural and Remote Homelessness, Waskaa'igan Neegan Safe Warm Space, Dauphin, Manitoba, 25 lived experts, August 21, 2025.
- Queer and Trans Refugee Claimants and Asylum Seekers, the 519 Community Centre, Toronto, 16 lived experts, August 25, 2025.
- Issues in Winnipeg, West Central Women's Resource Centre, Winnipeg, 17 lived experts participated in this local dialogue, August 29, 2025.



Appendix B: Sources on cost savings associated with upholding the right to adequate housing

The following reference list provides a snapshot of the evidence that has been presented by government and civil society highlighting the cost savings associated with upholding the right to adequate housing. Indeed, shifting funding from institutions into safe, affordable housing with community-based supports will help government to uphold their obligation to realize the right to adequate housing while also reducing public spending. Over the past three decades, this evidence has been conducted based on one-off, short-term projects by government and civil society, that has primarily been ignored by government.

1. Canadian Alliance to End Homelessness. (2020). *Recovery for all: Proposals to strengthen the National Housing Strategy and end homelessness*.
<https://homelesshub.ca/resource/recovery-all-proposals-strengthen-national-housing-strategy-and-end-homelessness>
— Proposes federal investments in supportive housing to reduce reliance on emergency shelters.
2. Canadian Alliance to End Homelessness. (2023). *Ensuring housing justice for Two-Spirit, trans, and non-binary people in Canada: Recommendations for homelessness prevention and community action*.
https://caeh.ca/resource/ensuring-housing-justice-for-two-spirit-trans-and-non-binary-people-in-canada-recommendations-for-homelessness-prevention-and-community-action_107.pdf
— Provides data on housing discrimination and affordability barriers, with policy recommendations for inclusive housing systems.

3. Canadian Alliance to End Homelessness. (2024, June 26). *Pride Month: The right to housing for gender diverse people*. <https://caeh.ca/pride-housing-for-gender-diverse/>
 - Summarizes findings from a pan-Canadian study on housing rights violations and systemic barriers for gender-diverse people.
4. Canadian Human Rights Commission. (2025, October 17). *A housing framework that leaves no one behind*. <https://www.chrc-ccdp.gc.ca/resources/newsroom/housing-framework-leaves-no-one-behind>
 - Discusses systemic failures and advocates for redirecting institutional funding to housing with supports.
5. Canadian Observatory on Homelessness. (2024). *Homelessness prevention research agenda*. <https://preventhomelessness.ca>
 - Research themes include systems-level cost savings through prevention and housing-first models.
6. Correctional Service Canada. (2025, February 24). *Offenders and reintegration*. <https://www.canada.ca/en/services/policing/corrections/reintegration.html>
 - Describes reintegration programs but notes the absence of a dedicated housing budget despite high rates of homelessness among released individuals.
7. Ecker, J. (2017). *LGBTQ2S adult housing needs assessment*. Canadian Observatory on Homelessness. https://www.homelesshub.ca/sites/default/files/LGBTQ2S%20Adult%20Housing%20Needs%20Assessment_Final%20Report_23Nov2017%20%281%29.pdf
 - Though slightly older, this foundational study offers valuable insights into housing gaps and support needs for LGBTQ2S adults.
8. Health Canada. (2023, February 7). *Working together to improve health care for Canadians*. <https://www.canada.ca/en/health-canada/news/2023/02/working-together-to-improve-health-care-for-canadians.html>
 - Includes investments in home and community care as alternatives to institutional care, with implications for housing-based health supports.
9. Housing, Infrastructure and Communities Canada. (2024, October 29). *Supporting communities in tackling homelessness*. <https://www.canada.ca/en/housing-infrastructure-communities/news/2024/10/supporting-communities-in-tackling-homelessness.html>
 - Highlights targeted funding to reduce homelessness through innovative housing-first approaches.

10. Housing, Infrastructure and Communities Canada. (2025, January 28). *Reaching Home: Canada's Homelessness Strategy*. <https://housing-infrastructure.canada.ca/homelessness-sans-abri/index-eng.html>
 - Outlines a \$5 billion investment in community-based homelessness prevention, emphasizing cost-effective housing solutions.
11. John Howard Society of Ottawa. (n.d.). *Housing supports*. <https://johnhoward.on.ca/ottawa/services/housing-supports/>
 - Highlights post-incarceration housing supports that reduce recidivism and shelter reliance.
12. Matthew House Ottawa. (2024). *The cost of diverting refugee claimants from homelessness: A simple case study*. <https://matthewhouseottawa.org/diverting-refugee-claimants-from-homelessness-a-simple-case-study>
 - Demonstrates that transitional housing for refugee claimants costs approximately \$930/month versus \$2700–\$6000/month in shelters/hotels.
13. Max Bell Foundation. (2023). *Housing in Canada: Shelter and the storm*. <https://maxbell.org/housing-in-canada-shelter-and-the-storm>
 - Panel discussion on systemic housing failures and the need for coordinated investment in non-market housing.
14. Social Research and Demonstration Corporation, Canadian Observatory on Homelessness, & Mentor Canada. (2024). *Safe, stable, long-term: Supporting 2SLGBTQ+ youth along the housing continuum – Final integrated report*. <https://homelesshub.ca/resource/safe-stable-long-term-supporting-2slgbtq-youth-along-housing-continuum-final-integrated-report/>
 - Maps youth journeys across housing services and proposes a queer housing continuum model.
15. Stouffer-Lerch, S. (2025, June 10). *2SLGBTQ+ adult homelessness and the importance of tailored housing supports in Toronto*. Homeless Hub. <https://homelesshub.ca/blog/2025/2slgbtq-adult-homelessness-and-the-importance-of-tailored-housing-supports-in-toronto>
 - Highlights disproportionate rates of homelessness among 2SLGBTQ+ adults and the cost-effectiveness of tailored housing models like LOFT and Fife House.
16. Women's Shelters Canada. (2024). *The high cost of safety: Why funding gaps are stalling the creation of second stage transitional housing for survivors of violence*. <https://endvaw.ca/archives/the-high-cost-of-safety-why-funding-gaps-are-stalling-the-creation-of-second-stage-transitional-housing-for-survivors-of-violence/>
 - Details cost barriers and funding needs for GBV housing with wraparound supports.

Neha



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logement