

Neha



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



National
Housing
Council

Conseil
national du
logement

Aussi disponible en français sous le titre : « *Un endroit où nous pouvons respirer, guérir et avoir notre place* » : ce que des femmes et des personnes bispirituelles, transgenres et issues de la diversité de genre de toutes origines ont dit à la commission d'examen Neha au sujet de leur droit à un logement sûr, suffisant et abordable.

Disclaimer: The views or opinions expressed in this report are solely those of the Neha review panel and do not necessarily represent or reflect the official policy or position of the Government of Canada, Housing, Infrastructure and Communities Canada (HICC), or the National Housing Council. The Neha review panel does not act or speak on behalf of the Government of Canada or HICC.

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

- A Final report: “*We are human. We deserve a place to live. It's that simple*”: The final report and recommendations of the Neha review panel.
- 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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Dedication

This report is dedicated to all the women, Two Spirit, Trans, and gender-diverse people in Canada of all ages 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.



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Letter from the Neha Review Panel

“We’re tired of talking about this. The research has been done. What are you waiting for? We’re human beings. We’re people. We deserve a place to live. It’s that simple.”

– A participant in one of the Neha virtual dialogues

Neha has heard over and over again that people with lived experience of homelessness and housing insecurity, and the organizations that work to support them, are sick and tired of sharing their knowledge and insight only to be ignored by decision-makers.

We heard this in the hundreds of written submissions made to Neha, and we heard it in the many dialogue sessions that we have held over the last eight months.

We are profoundly grateful to all those who nonetheless chose to share their insights and expertise in hopes that this time it would make a difference.

To all of you, we say we have heard you. We share your anger and frustration. And we stand with you in your determination to bring about the fundamental changes needed to uphold and fulfil the **human right to housing** for women, Two Spirit, Trans, and gender-diverse people in all their diversity - First Nations, Inuit, and Métis, Black and racialized, living with all types of disabilities, immigrants and refugees, youth and older adults, with and without children, of all sexual orientations and gender identities, survivors of violence, sex workers, those who have been incarcerated and institutionalized, and all others facing discrimination and inequity.

Canada is in the midst of a profound national housing emergency. This emergency is especially acute for women, Two Spirit, Trans, and gender-diverse people – and even more so for those who experience racism, ableism, homophobia, transphobia, and other forms of oppression in addition to sexism.

Everyone has the right to a safe, comfortable, and secure place where they and their loved ones can be healthy and thrive. But for far, far too many, this fundamental human right feels like an impossible dream. This is simply not acceptable. Not in a country that has the resources and capacity to do much, much better.

Canada took an important and historic step when it enshrined the right to housing in the National Housing Strategy Act. Human rights, however, must be more than mere words.

Participants in the review panel process have detailed the numerous ways governments in Canada have failed to live up to clearly established human rights obligations, especially in respect to those individuals and communities in greatest need of government support.



In fact, we have seen how women, Two Spirit, Trans, and gender-diverse people remain largely invisible in Canada's housing policies and programs. Especially those who face intersecting inequities on the basis of race, Indigenous identity, disability, age, immigration status, ethnic origin, income, sexual orientation, and other grounds. Their unique needs are not being prioritized. Government housing initiatives are not being assessed for whether or not their needs are being met.

And because safe, good quality housing is neither affordable nor accessible – not in anything close to the quantities needed – lives are being lost and families torn apart.

This is where we hope our work can make a difference: by calling attention to the routinely overlooked, gendered dimensions of the national housing emergency – and pressing government for real and meaningful action.

We have tried our hardest to approach our mandate in a way that is different from past studies and inquiries. We hope that the result will also be something different – a powerful tool that can be used to hold Canada accountable for its obligation to uphold the right to housing for all women, Two Spirit, Trans, and gender-diverse people, without discrimination and without exception.



Sylvia Maracle (Skonaganleh:ra) Chair of Neha, 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 to 2001.



Pamela Glode Desrochers 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.

Introduction

A woman living with disabilities said that although her apartment is barely large enough to meet her own needs, she often takes in friends and acquaintances with disabilities because they have nowhere else to turn. She said,

“Most of the disabled people I know who have avoided ending up on the streets, it’s only because their family or a friend were able to help them. It’s not because the system stepped in. I have one bedroom and I’m the one taking in other people with disabilities, helping them stay off the streets. How is that? It shouldn’t be those of us at the bottom catching other people from falling over the edge.”

A woman living in a single room occupancy building described how the failure to properly maintain the building has impacted her and her neighbours. The elevator has frequently broken down over the last two years. When she spoke with the Panel, the elevator had been out of service for two months. The woman has mobility issues and walks with a cane. Any time she leaves the building, she has to climb up and down 86 stairs to her fourth-floor room. One neighbour, who uses a wheelchair, had not gone outside in two months. She said,

“I’m sharing this story not because it’s special, but because it is so ordinary for disabled people in my community to deal with this kind of thing.”

How the Neha review panel was established

Neha is one step in a long journey towards making the right to housing real in Canada.

In 2019, following decades of advocacy by lived experts and civil society organizations, Parliament passed the National Housing Strategy Act (NHS Act), which commits Canada to uphold the right to housing. The NHS Act established accountability mechanisms, including the Federal Housing Advocate, National Housing Council, and review panels. The National Housing Council appoints three of its members to a review panel when asked to do so by the Federal Housing Advocate. A review panel holds a hearing on a systemic housing issue, with the participation of people directly affected. It delivers its findings and recommendations to the federal Minister responsible for housing, and the Minister is required to issue a public response.

In 2022, two national networks, the Women's National Housing & Homelessness Network¹ and the National Indigenous Feminist Women's Housing Working Group², activated this process by submitting human rights claims to the Federal Housing Advocate. After reviewing these claims, the Federal Housing Advocate made a request in 2023 to the National Housing Council to appoint a review panel on "the failure to prevent and eliminate homelessness amongst women and gender-diverse people."³

The Neha review panel was appointed 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." It 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 itself a natural concept.

- 1 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.
- 2 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.
- 3 Federal Housing Advocate (2023). [The failure to prevent and eliminate homelessness amongst women and gender-diverse people](#).

The Neha approach

The Neha members understand that women, Two Spirit, Trans, and gender-diverse people are distinct groups, each facing specific experiences and barriers when it comes to housing. The Neha wheel depicts the diversity within and among these groups. This includes First Nations, Inuit, Métis, Black and racialized people; people living with all types of disabilities; immigrants and refugees; youth and older adults; parents, caregivers, and those without children; people of diverse sexual orientations and gender identities; people living on low-income; survivors of violence; sex workers; those who use substances; those who have been incarcerated or institutionalized; veterans; and all others at risk of being left behind. **Throughout this report, the phrase “women, Two Spirit, Trans, and gender-diverse people” should be understood as acknowledging all these diverse experiences and needs.**





The Neha wheel depicts the review panel's principles and approach. Placing rights holders at the centre of the process, Neha is grounded in four priorities:

Safe spaces for people with lived and living experience

Instead of calling their process a “hearing,” which has a negative meaning for many, members referred to it as a dialogue. Members brought their own lived experience of inadequate housing and homelessness to their review panel role, in addition to their professional expertise on housing policy and human rights.

Inclusion and accessibility

The members wanted to hear from the full diversity of women, Two Spirit, Trans, and gender-diverse people who experience barriers to accessing their right to housing – especially those who are most often left behind. With the support of partner organizations, Neha held dialogues in a wide range of locations, from a Nova Scotia prison to a northern Manitoba drop-in, to a queer and trans community centre in downtown Toronto. The review panel aimed to ensure that all dialogue participants had access to any accommodations they required to participate.

Participant and panel supports

Too often, government consultations, research, and human rights processes ask participants to re-live their traumatic experiences of inadequate housing and homelessness. Instead, the members invited people with lived experience to sit in a circle with them to define what works and what doesn't. They committed to a way of engaging people in discussions which promotes truth, friendship and respect.

Rights-focused solutions

Participants in the dialogues were seen as rights-holders, not victims. The Neha members kept the process focused on the vision of safe, adequate, and affordable housing for all women, Two Spirit, Trans and gender-diverse people, the government's responsibility to uphold that right, and the solutions required to get there.

The Neha review panel's approach to examining the issue is modelled on the medicine wheel, with four stages of inquiry:



Vision

Articulating the vision for safe, adequate, and affordable housing that we are striving towards.



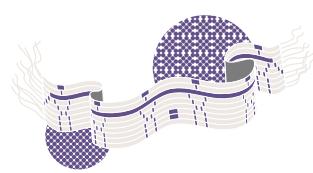
Knowledge

Gathering the knowledge required to support this vision.



Reason

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



Action

Defining the actions required to bring the vision into reality.

The Neha dialogues

In gathering evidence, Neha's objective was to hear from rights-holders and the organizations working with them, and to bring their voices, their needs, and above all, their solutions, to the attention of the federal government.

Between November 2024 and April 2025, Neha invited members of the public to provide written submissions. To make the process more accessible, the Women's National Housing & Homelessness Network and the National Indigenous Women's Housing Network created a Community Champion program to support submissions from individuals with lived experience of living unhoused or in situations of precarious housing. Neha received more than 250 written submissions, many of these the result of collaborations among groups of friends and neighbours or the product of extensive community engagement processes carried out by local and national organizations.

In addition, Neha worked with partners to convene 13 in-person and virtual oral dialogues. These sessions included roundtables and breakout groups at national events organized by partner organizations, as well as sessions where Neha reached out to members of specific communities and organizations to share their insights. Through these dialogues, Neha heard from more than 250 witnesses from communities across Canada.

As Neha heard throughout the dialogues, it is critical to acknowledge the many important studies and inquiries that preceded this panel's work. Individuals and organizations highlighted previous studies on homelessness and housing insecurity as well as numerous reports that are closely interconnected with other human rights.

These include 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 Advocate and National Housing Council.⁴

Neha's work is intended to build on and supplement the findings and recommendations of these previous reports, as well as the substantial amount of information shared by participants in the review process.

During the dialogues, Neha heard many deeply personal stories from individuals with lived experience of homelessness and housing insecurity. These accounts underscore the real-life consequences when housing systems fall short of meeting human rights obligations—particularly for women, Two Spirit, Trans, and gender-diverse people, including those who are Indigenous, racialized, newcomers, living with disabilities, and others facing systemic barriers.

But witnesses' accounts also paint a picture of the dignity and strengths of women, Two Spirit, Trans, and gender-diverse people of all origins, and the ways they are working – individually and collectively – to make a difference. To claim their own right to housing. And to advance housing solutions for family, friends, and neighbours that respect human dignity and embrace and celebrate the diversity of our communities.

Women, Two Spirit, Trans, and gender-diverse people are leading by example. Neha urges all governments to listen to these experts and follow their lead.

⁴ 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](#)

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

“The right to housing is not abstract. It is the right to live without fear, to choose safety over survival, to recover from violence, to stay rooted in culture, kin, and community.”

— Arlene Haché, Chair, Women’s National Housing and Homelessness Network

The 2019 National Housing Strategy Act (NHSA) affirms the human right to adequate housing and commits the federal government to uphold this right. Under international law, the right to housing is a holistic right that goes far beyond mere shelter. A UN body states 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.**”

The right to housing includes the right to long-term, secure housing that is affordable, meets essential needs such as clean drinking water, provides healthy living conditions, is accessible, is in a location close to other necessities like healthcare and child care, and that allows individuals and families to maintain cultural practices and express individual identity.



The right to housing is also interconnected with other rights recognized and protected in Canadian and international law. This includes the prohibition of racial and gender discrimination, the right to live in safety, the rights of people with disabilities, the rights of the child, and the rights of Indigenous Peoples. Fulfilment of the right to housing is understood to be essential to the enjoyment of a wide range of other fundamental human rights that governments must respect, protect, and fulfil including the right to health, the right to employment, the right to culture, and the right to live free from violence.

The right to housing doesn't mean governments must give everyone a house. It means they must:

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

All orders of government share these human rights obligations and are each expected to act within their own jurisdictions and areas of influence. The federal government has a duty to play a leadership role.

A woman who came to Canada as a refugee described how she now lives with the daily fear of being evicted or having her children taken away. A single mother of three, she said she is on a waiting list for subsidized housing but has no idea when, or if, such housing will ever become available to her. The best accommodation that she can afford on her limited income is a single room in an apartment shared with strangers.

She fears that the cramped living conditions could result in her children being taken away if she is reported to the child welfare system. She questioned why Canada has laws about the accommodations that a parent must provide for their children, but no laws to ensure that such accommodation is actually available and affordable.

Elements of this report

This is one of two reports⁵ published as Neha completes its mandate. This report attempts to summarize as concisely as possible the wealth of knowledge shared with the panel over the last year. These are the insights that have shaped and informed the separate report of Neha's findings and recommendations to the federal Minister of Housing, Infrastructure and Communities.

This report is organized into four sections, reflecting the approach that guided Neha throughout this process.



Vision

What the right to safe, adequate, and affordable housing means to women, Two Spirit, Trans, and gender-diverse people.



Knowledge

How violations of the right to housing and other rights impact women, Two Spirit, Trans, and gender-diverse people.



Reason

Systemic barriers to the full realization of the right to housing for women, Two Spirit, Trans, and gender-diverse people.



Action

Measures that all levels of government can and must take to uphold their human rights responsibilities.

In each section, the report aims to strike a balance between acknowledging the wealth and specificity of the experience and insights shared with Neha, and producing a summary that is nonetheless as concise, accessible, and useful as possible for all involved.

Voices in this report

This report attributes quotations by name only to those individuals who participated in our recorded sessions as organizational spokespersons. All other quotations are anonymous. Other aspects of identity shared by participants are

5 Neha Review Panel. (2025). "We are human. We deserve a place to live. It's that simple": The final report and recommendations of the Neha National Housing Council. (2025). ["We're human beings. We deserve a place to live. It's that simple.": The final report and recommendations of the Neha review panel](#), & National Housing Council. (2025). & International Law and the Human Right to Adequate Housing for Women, Two-Spirit, Trans, and Gender Diverse People.



indicated wherever it would not compromise the speaker's anonymity.

1 Vision

What the right to safe, adequate, and affordable housing means to women, Two Spirit, Trans, and gender-diverse people

“I want housing that truly feels like a home – warm, welcoming, and protective. Everyone deserves that foundation to heal, grow, and build a better future, especially those of us who have been pushed to the margins for too long.”

– A Black woman and mother with lived experience of unsafe and insecure housing

Participants in the dialogue process were clear: recognizing the right to housing is not enough; the right must be implemented in a way that actually addresses the urgent needs of all women, Two Spirit, Trans, and gender-diverse people. A South Asian participant from Toronto wrote, **“I hope future generations grow up in a world where housing is a right, not a struggle.”**

1.1 A HOME IS MORE THAN JUST SHELTER

Some participants took issue with the term “adequate housing”, saying that housing that is merely “adequate” falls far short of their vision for equality and justice. A Trans man said, **“The focus on ‘adequate’ housing is misleading. Why don’t you give us what you would give yourself, your families, your friends? Give us a situation that allows us to thrive, not just survive by the skin of our teeth.”**

Instead of ‘adequate housing’, many participants talked about healthy and supportive ‘homes’, ‘neighbourhoods’, and ‘communities’. A young Indigenous mother wrote,

“My vision for safe, affordable housing is rooted in healing, dignity, and community. This vision matters deeply – because housing is not just about having a roof over our heads. For women, Two-Spirit, Trans, and gender-diverse people, especially those of us who carry the weight of intergenerational trauma and systemic barriers, it’s about having a place where we can breathe, heal, and belong.”

In their joint submission, the Salish Lelum Housing Society and Tillicum Lelum Aboriginal Friendship Centre, Nanaimo, BC, quoted the National Inquiry into Missing and Murdered Women and Girls, which expressed a vision of **“a world within which First Nations, Inuit, and Métis families can raise their children with the same safety, security, and human rights that non-Indigenous families do.”**



1.2 AFFORDABILITY

Many participants said that the cost of safe, quality housing should never compromise the ability to meet other basic needs. A Métis lone parent wrote,

“My vision is for a society where no one has to choose between housing and other essential needs. Housing should serve as a foundation for thriving, not just surviving. I dream of a future where my daughter, and generations to come, can live free from the anxiety of financial instability or displacement.”

1.3 SAFETY AND PRIVACY

Safety and privacy are critical dimensions of the right to housing. A striking number of submissions talked about the importance of simply having a door that locks and building entrances that are secure. One participant said, **“My vision for women is that their home is a safe place and only those they allow in, may come in.”**

Privacy and security are top of mind for many women, Two Spirit, Trans, and gender-diverse people given the pervasive violence and harassment that they face. A woman with disabilities wrote, **“I do not want to live with men since I am a widow and am also a rape survivor. I feel safest with other women, Two Spirit, Trans, and gender-diverse people.”** An Indigenous woman said that they needed a home where they wouldn’t constantly be **“in the fight or flight zone.”**

Another person said, **“I want reasonable housing costs that don’t force sex workers into high-risk working conditions in order to sleep inside.”**



1.4 HOUSING FOR DIVERSE FAMILIES AND INTERGENERATIONAL LIVING

Participants stressed the importance of options suitable for households of diverse sizes and configurations. Different cultures have different concepts of family and the amount of space and privacy required for each family member. Participants talked about extended families, kinship relations, and chosen families based on friendship and common experience. One Indigenous participant said, **“That is part of who we are, taking care of our old people. That’s a big bond [our young people] are missing.”**

Housing needs change over time, as families expand and family members age. Intergenerational housing—housing that is suitable for both young children and for elderly people as they age—is a critical part of culturally appropriate housing. Pauktuutit Inuit Women of Canada noted, **“As you age and your needs change, that house should grow and adapt to those needs to ensure it is safe and adequate.”**

1.5 GENUINELY ACCESSIBLE HOUSING

Participants also spoke about the importance of spaces that are fully accessible. People with disabilities told Neha that without accessible housing, they face the constant threat of either homelessness or institutionalization.

Many participants also expressed anxiety about remaining housed as they age, and as their accessibility needs increase. One person wrote, **“I envision barrier-free housing that is designed to be inclusive and accessible to all individuals, regardless of age, ability, or background. It ensures that architectural and environmental features do not create obstacles for anyone, including people with disabilities, older adults, and individuals with temporary impairments.”**



1.6 WELL MAINTAINED, HEALTHY SPACES PROVIDING ESSENTIAL AMENITIES

It is essential that homes are well maintained. This includes timely repair of essential amenities such as heat, air conditioning, ventilation, running water, and drinking water. Rachel Stebner, Peer-to-Peer Community Co-op, said, **“Sometimes we don’t need to reinvent the wheel when it comes to disability rights. We just need to fix the damn elevators.”**

A number of participants said that access to the Internet should be considered a basic amenity, given the importance of connectivity in every aspect of life. An inmate in federal prison said, **“Everything is now online: paying rent, application for apartment, applying to jobs, finding resources, social connections.”**

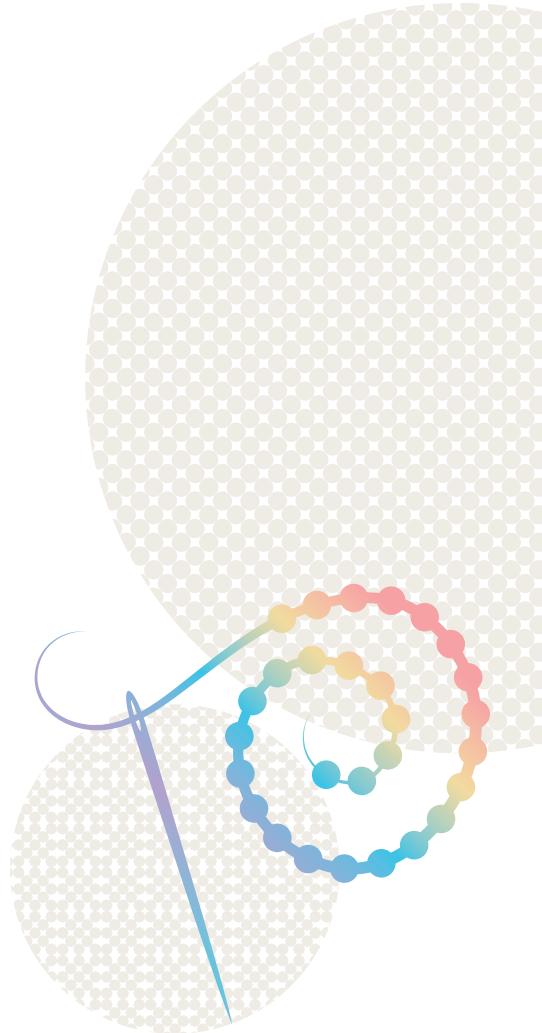
Participants talked about other features that are essential to mental health and well-being. Some spoke about the importance of sunny spaces and windows with a view of something more than the walls of other buildings. Some commented that for people who don’t often leave their residence – because of limited mobility or other reasons – the size and quality of the space are especially important. One person said they would like to be able to look out the window and see at least a single tree. Others talked about wanting to have access to a yard where they could garden and their children could safely play.

Many participants spoke passionately about the importance of animals in their lives and the desire to live in a place where they are free to have a pet.

1.7 SPACE FOR VISITORS AND GUESTS

Participants also said that a home should be a welcoming space for visitors. Having space – and permission – to have friends and family over is vital to avoid social isolation. Many expressed their dreams of cooking and sharing a meal with friends. A First Nations Trans woman described this as **“taking part in all of the pieces of domestic bliss we take for granted as housed people.”**

First Nations, Inuit, and Métis participants living in urban centres particularly emphasized the importance of being able to host family members visiting from their home communities. A Two Spirit Elder said, **“For me, adequate housing is if I have a place to have my relatives come stay with me.”**



1.8 COMMUNAL AND CULTURAL SPACES

Many people talked about the value of communal spaces, where you can get together with neighbours and larger groups of friends and family. The Peer to Peer Community Co-op expressed their vision in these concrete terms: **“We believe balconies, outdoor spaces, and common rooms aren’t luxuries; they’re lifelines. We need places to breathe, connect, and build community.”**

First Nations, Inuit, and Métis participants talked about having communal spaces for preparing and sharing traditional foods and for cultural and ceremonial practices. The Edmonton 2 Spirit Society said the right to housing requires **“culturally rooted spaces... integrating Indigenous worldviews, healing practices, and community connections into housing models to reflect the needs and values of Two Spirit people and other Indigenous individuals.”** Métis 2SLGBTQQIA+ people called for **“spaces meant for and exclusive to them, where they could make cultural connections without fear of being judged or needing to ‘tone down’ their gender and/or sexual identities.”**

Many aspects of First Nations, Inuit and Métis land-based traditions are especially difficult to maintain in an urban setting. The participants shared that building neighbourhoods or “urban villages”, rather than focusing only on individual housing units, would make it much easier to provide spaces where traditions like sacred fires and sweat lodges can be maintained.

1.9 NEIGHBOURHOOD AND COMMUNITY

Neha also received compelling testimony about the importance of neighbourhood and community. Being close to essential services and amenities such as day care, grocery stores, and medical clinics is especially important for people with limited mobility or who cannot afford transportation. Participants also talked about wanting to live in neighbourhoods where they feel safe and accepted. Where you can be yourself without judgement or harassment.

A Black, queer newcomer said, **“It’s not just about your house. It’s about your community. If you go out and you don’t feel safe, it’s draining.”**

The South Asian Legal Clinic and South Asian Legal Clinic of Ontario situated housing in “an ecosystem where all individuals are supported with dignity, equity, and respect.” They wrote, **“We envision a future where families and communities can thrive in supportive, inclusive environments. This would involve communal living models that foster mutual care, respect, and accountability, where people can support each other and share resources while still having the privacy and autonomy that all deserve. Generations to come should be able to build their lives in spaces where they are embraced, empowered, and uplifted by the structures and systems around them.”**



1.10 HOUSING WITH SUPPORTS

Many participants also talked about the importance of wrap-around supports that help people stay housed and to be healthy in those spaces. A Two Spirit person of First Nations and European ancestry wrote, **“True safety in housing means providing not only shelter but also comprehensive support systems that foster well-being and healing.”**

Participants also said that access to safe, adequate, and affordable housing should not be conditional on an individual agreeing to specific supports mandated by the governments or a housing provider. One participant said, **“Everyone deserves a safe home regardless of where they are in their healing journey.”**



1.11 AGENCY AND AUTONOMY

Participants from diverse backgrounds told Neha that they wanted to live in spaces where their agency and autonomy are respected. One participant said that their vision of a housing system was one that would **“empower individuals and communities with greater control over their own lives.”**

For some, this vision of greater autonomy was linked to respecting and upholding Indigenous laws and teachings. Marie McGregor Pitawanakwat, Wikwemikong, Ontario wrote,

“Before the white settlers’ invasion of our ancestral lands, Indigenous women in many Indigenous nations held the role and responsibility for building homes, maintaining homes, and, when necessary, moving the homes. Through this role and responsibility, Indigenous women exercised agency, self-reliance, independence, and an honoured place within our clans, communities, and nations.”

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

1.12 DIVERSITY

Finally, dialogue participants were clear that a diversity of housing options is needed to meet the many distinct needs among women, Two Spirit, Trans, and gender-diverse people. As one person said, **“Always building the same blueprint of a townhouse is not ideal.”** Participants said they wanted to be able to define for themselves what makes a home that is safe, comfortable, and appropriate for their circumstances, rather than being constrained by colonialism, Eurocentric, and heteronormative assumptions.



To summarize, the visions expressed by the participants align with the right to adequate housing as defined in the National Housing Strategy Act, reflecting its core elements—affordability, habitability, accessibility, location, cultural adequacy, availability of services and legal security of tenure. It is a collective vision rooted in safety, dignity, and belonging, recognizing that housing must reflect the diverse realities, identities, and needs of all people. Rather than a one-size-fits-all approach, participants emphasized the importance of housing that supports healing, autonomy, and community, and that enables individuals not just to survive, but to thrive in spaces that are inclusive, culturally grounded, and responsive to their lived experiences.

2 Knowledge

How violations of the right to housing and other rights impact women, Two Spirit, Trans, and gender diverse people



“

“I can't tell you what affordable housing looks like because I haven't seen it yet.”

Neha heard countless, deeply moving accounts of women, Two Spirit, Trans, and gender-diverse people with unique identities and backgrounds, struggling to survive because they can't find a decent place to live.

There is a profound national shortage of genuinely affordable housing impacting every community in Canada. Participants described individual and collective efforts to secure safe affordable housing and the many barriers encountered, including waiting years to access any form of subsidized housing.

Women, Two Spirit, Trans, and gender-diverse people expressed how they face additional disadvantages in accessing safe, affordable, decent quality housing. Participants shared how, low wages, dependency on inadequate social assistance programs, and their roles as primary caregivers for children and elderly family members often affected their ability to afford housing. Two Spirit, Trans, and gender-diverse people also expressed how they face discrimination throughout all aspects of the housing system.

Participants expressed how these barriers to finding safe, adequate, affordable housing are further amplified for those women, Two Spirit, Trans, and gender-diverse people of intersectional identities, including those who are also Indigenous, a member of a racialized community, living with a disabilities or mental health challenges, a newcomer to Canada, an older adult, a sex worker, and/or someone who has been institutionalized, whether in the youth care system or in the prison system.

Many participants traced the roots of the housing emergency to Canada's colonial laws and policies that uprooted Indigenous Peoples from their lands and denied the right of Indigenous Peoples to manage their own decisions. Pauktuutit Inuit Women of Canada explained, "Inuit housing problems began when the nomadic ways of life were forced into permanent settlements in the 1950's." First Nations, Inuit, and Métis participants spoke of how these same colonial approaches continue to play out in the persistent underfunding of basic services in Indigenous communities, the generations of children taken from their families, and the ongoing failure of federal, provincial, and territorial governments to protect Indigenous women, girls, Two Spirit, Trans, and gender-diverse people from violence and exploitation.

“The violations outlined in our claim are systemic. They are rooted in colonization and the deliberate dispossession of Indigenous Peoples from our lands and homes.”

— Marie McGregor Pitawanakwat, Chair, National Indigenous Women's Housing Network



2.1 INADEQUATE INCOME AND RISING COSTS

Participants said that subsidized housing units are full and there are thousands of people on wait lists. The overall housing shortage means that landlords in the private market **“can ask whatever they want.”**

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 2SLGBTQQIA+ communities experiencing an even larger, intersectional wage gap. Comparing average income to average rents, the Pay Equity Commission 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 average income required to meet average rental costs climbs to 83%.

Front d'action populaire en réaménagement urbain wrote that in 2021 single-parent families in Quebec – 80% of which are headed by women – had a median annual income \$33,000 lower than that of two parent families. As a result, they were spending a disproportionate amount of income on housing and **“risked compromising their other essential needs, particularly those related to caring for their children.”**

Submissions also emphasized that as rents have risen, other costs of living have also climbed. The joint submission by YWCA Moncton, Saint John Human Development Council, and Crossroads for Women specifically highlighted the shortage of affordable childcare.

Ownership is even more out of reach. Pauktuutit explained that federal rent-to-own mortgage programs had been unsuccessful because they are unaffordable for Inuit families.

The large and widening gap between income and the cost-of-living including housing has put safe, permanent, quality housing out of reach of many women, Two Spirit, Trans, and gender-diverse people. Commenting on the gap between social assistance and the actual cost of living, one participant said that every politician **“should get \$2000 a month for six months and try to pay for rent, food, etc. That would motivate them to make changes.”**





2.2 BARRIERS TO ESCAPING VIOLENCE AND EXPLOITATION

One of the most distressing impacts of the housing emergency is that women, Two Spirit, Trans, and gender-diverse people are forced to remain in dangerous living situations because they simply have no place else to go. A sex worker with disabilities wrote, **“I am staying in an abusive relationship currently because I cannot afford to leave and there is no help available to me.”** Jeneane Fast, Canadian Centre to End Human Trafficking, said that finding housing is the most frequent need expressed by people trying to escape trafficking **“and the most challenging to address.”**

The Canadian Centre for Women’s Empowerment (CCWE) notes that even women who are homeowners and financially secure may be forced into precarious housing situations when a relationship ends. CCWE notes that ex-partners may deliberately tie up their financial assets through protracted divorce proceedings as a way to continue to exert abusive control.

Statistics shared from different regions show that only 12 to 25 percent of women, Two Spirit, Trans, and gender-diverse people who have experienced violence are able to find any form of permanent housing. This means most women, Two Spirit, Trans, and gender-diverse people are stuck living in shelters that are intended to be temporary, are homeless, or are forced to return to situations of violence.

Critically, the national housing emergency is unfolding in the context of rising, openly expressed homophobia and Transphobia, along with efforts to roll back previous human rights victories of the 2SLGBTQQIA+ community. Speaking specifically about the consequences of Transphobia, lived expert advocate Hilary Chapple said, **“Trans kids will lose their lives if we don’t act.”**

Participants noted that the typical government approaches that equate safety with reducing crime don’t meet the needs of Two Spirit, Trans, and gender-diverse people of diverse origins. Speaking of the community policing office in a public housing building, a Black participant said that it made her feel less safe, not safer. Safety also includes a sense of belonging and the opportunity to live in spaces free from discrimination and harassment. An Indigenous front-line worker said, **“It’s important for us to create community. That’s what is uplifting us and helping us to grow. We need communities where all of our relatives feel safe.”**

2.3 IMPACTS ON HEALTH, SAFETY, AND SECURITY

When women, Two Spirit, Trans, and gender-diverse people are able to obtain housing, that housing is often inadequate or unsafe and their ability to stay in these accommodations may be tenuous.

Many shared how housing options available to people with low and fixed incomes are often poor quality. Métis National Council explained, **“Many houses/apartments within the budget of Métis citizens and families, especially for single-parent families, fall into disrepair quickly, are far too small, are infested with mold and/or pests, or are located far from community.”**

Neha also heard about sub-standard housing provided in First Nations. Participants said contractors building homes on reserve are getting away with sloppy construction that makes people sick and shortens the life of the buildings.

Participants shared experiences where they felt they had little protection against violence, harassment, and threats from other tenants. They described rooms without locks, buildings where strangers are constantly coming and going, and poorly lit and unmonitored common areas. A written submission on behalf of four people living in subsidized rental accommodations in Ontario said, **“We live in constant fear in these buildings. We hear and see people fighting. We know no one will come to help. Some of us do not own a phone to call for help.”**

Neha also heard accounts of landlords using their power to sexually coerce their tenants, and of case workers pressuring them to accept housing that was unsafe and inappropriate. One person who sought help in finding housing after living in an emergency shelter, described being forced to **“take the first place offered regardless of my safety as a Trans woman.”**

2.4 THREATS TO THE WELL-BEING AND INTEGRITY OF FAMILIES

Neha heard over and over again how difficult it is to find suitable accommodations for families. Many participants shared that larger, multi-bedroom accommodations are often unavailable or too costly or described discrimination from landlords in the private market who refuse to rent to families. Other participants shared that service providers sometimes make decisions that housing is not suitable for their families – because there are not enough bedrooms, or the total living space is too small – without considering how they define their own needs.

The shortage of affordable housing for families and multi-generational living is particularly acute in First Nations reserves and in many northern and remote communities. One person, talking about the housing built on reserve, said, **“The Government of Canada is not a good service provider. We get housing built, but not the size of houses we need.”**

Neha heard the anxiety of parents who fear that their children could be taken away if child and family services decide that their accommodations are not suitable. The threat of child apprehension is so pervasive that many families struggling to find or maintain safe, adequate housing live in fear that any contact with support services could bring them to the attention of the child protection agency. We also heard the frustration and heartbreak of parents whose children will not be returned to their care unless they achieve the nearly impossible task of obtaining a larger living space.

A number of participants commented that money spent on foster homes and youth homes would be better spent providing the support that families need to stay together. Veronica Snooks, Canadian Lived Experience Leadership Network, said, **“Housing with help and supports would have made a difference in my life. If I could have had housing with my kids rather than them being taken away. With support, I could have raised my kids.”**

2.5 BARRIERS TO REALIZING THE RIGHTS OF PEOPLE WITH DISABILITIES AND OLDER ADULTS

People with disabilities told the panel that accessible housing is nearly impossible to find. A single mother of an adolescent with a disability wrote, “**There are literally no wheelchair-accessible rentals available in Toronto’s regular housing market. I have never found a single one.**”

Almost all housing is designed for able bodied young people, not for people with disabilities, and not for the aging population. Federal, provincial, and territorial responses to the housing emergency have not changed this. Brad Evoy, Disability Justice Network of Ontario, said,

“There is a lot of talk about the need to build housing faster. But housing for who? What kind of housing? What good is new housing that people can’t get in the door to and won’t be able to live in and thrive?”

– Brad Evoy, Disability Justice Network of Ontario

Participants shared that even housing advertised as accessible may be unlivable for people with limited mobility, vision impairments, and other challenges. For example, one participant referenced a supportive housing building that had an accessibility ramp but whose doors were too heavy to be opened by someone in a wheelchair. Participants also pointed out that many forms of disability, such as hearing, vision impairment, and neurocognitive disabilities, are routinely ignored in determining whether or not housing is classified as “accessible.”

Participants noted that the severe shortage of accessible housing has led to increased use of institutionalization as a stop gap measure to house older adults and people with disabilities. Neha was also told that institutionalization as a result of homelessness and housing insecurity often means that Two Spirit, Trans, and gender-diverse people can no longer safely express their gender and sexual identities. Researcher Alex Nelson said this violation of the right to housing “**adds another level of precarity for queer people. Those institutions are places where people can be forcibly put back in the closet because they are not safe to be out.**”

The severe shortage of accessible housing also threatens the ability of older adults to continue living independently as they age. One participant, describing their own fear that they may not be able to remain in their current accommodations, said institutionalizing older people in nursing homes should not be “the new norm.” An 81-year-old woman from Toronto wrote, “**I am terrified of being forced into long-term care.**”

2.6 CRIMINALIZATION

Finally, Neha heard about how the national housing emergency is contributing to a cycle of criminalization and incarceration. During dialogue sessions with women, Two Spirit, Trans, and gender-diverse people in correctional facilities in Nova Scotia, one person said, housing “**directly affects whether we end up here or not.**”

People living unhoused and in low-income neighbourhoods described being under increased surveillance, leading to a greater chance of negative encounters with police. Participants gave the example of illegal drug use. People with their own accommodations can consume drugs in private. People who are unhoused cannot, and this makes their drug use a focus for law enforcement.

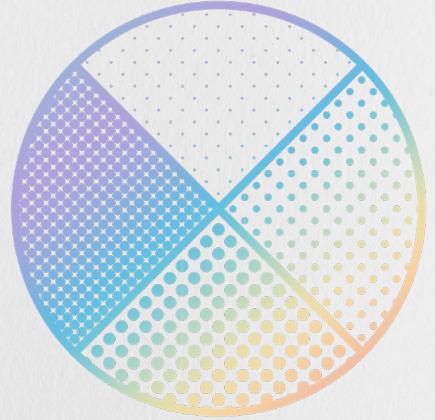
Lived experience experts also spoke about the pressure to commit crime to make ends meet. A person incarcerated in a provincial detention centre said, “**The cost of living doesn’t match what you can make doing a legal job, so people end up doing crimes.**” Others described being coerced into committing crimes by people in exchange for shelter and protection.

At the same time, the challenges finding quality, affordable housing make it harder for women, Two Spirit, Trans, and gender-diverse people to exit the prison system and successfully re integrate into society. It may be impossible to obtain bail or early release without demonstrating access to housing that is secure, and that meets other conditions, such as avoiding contact with past associates and people with criminal records.

Furthermore, without proper support, including housing with supports, many people find it too difficult to adjust to living outside an institutional setting. One said, “**I know a woman who got herself re-arrested because she couldn’t deal with being outside, was too overwhelmed. People deserve to get out but need transition support, to re integrate, to deal with the things that are overwhelming.**”



3 Reason



Systemic barriers to the full realization of the right to housing for women, Two Spirit, Trans, and gender-diverse people

“What women and gender-diverse people are experiencing in this country is a human rights crisis. And it’s not accidental. It is manufactured. It is structured. It is condoned. It is the result of policy choices that can and must be changed.”

– Arlene Haché, Chair, Women’s National Housing and Homelessness Network

Neha received extensive evidence – and heard impassioned testimony – that the national housing emergency is the direct consequence of governments in Canada not fully meeting their human rights obligations. Examples illustrated how, in many ways, the human right to housing for women, Two Spirit, Trans, and gender-diverse people is being undermined throughout the housing system—from the priorities set by governments to the actions of private landlords to gaps in the emergency shelter system.

Neha also heard that these impacts are especially pronounced for individuals whose gender identities intersect with other identities—including women, Two Spirit, Trans, and gender-diverse people who are Indigenous, racialized, newcomers to Canada, living with disabilities, or otherwise facing systemic barriers.

3.1 INADEQUATE INVESTMENT IN NON-MARKET HOUSING

Participants were highly critical of Canada's reliance on the private market to meet housing needs. In particular, Neha heard that a severe shortage of non-market housing options leaves renters dependent on the private market where prices are high and discrimination is widespread, particularly against families, Indigenous people, racialized people, and people with fixed or precarious income. Many participants who currently have housing described the constant fear that they could be evicted if they can't keep up with rent. A newcomer with disabilities wrote: **"I don't want to live on the streets, and it seems like if one thing goes wrong, I could end up homeless."**

Participants identified that booms in private housing construction have failed to deliver enough truly affordable housing. Specifically, participants provided evidence that construction of new affordable housing has fallen far behind the rate in which existing units are being lost to age or being converted to more expensive units. A 2024 study published by the Ottawa Alliance to End Homelessness, which was cited in the CAWI submission, found that for every new unit of affordable housing built in Ottawa, approximately 30 existing affordable units are lost.

One person said,

"The federal government's 'experiment' with leaving housing in the hands of the private sector is an unmitigated failure."

The National Housing Strategy Act includes an explicit commitment to "focus on improving housing outcomes for persons in greatest need", but the participants identified that the NHS did not fulfill this objective in practice. One long-time housing expert notes that the National Housing Strategy has not enabled the development of affordable housing for people living on low income. They said, **"doubling nonmarket housing is the best we can hope for in the next decade, because the stable financing, land policy and intergovernmental mechanisms that would enable nonmarket low-income housing have simply not been there in the NHS."**

Participants also noted that in the past, when private developers have included affordable units in order to access public subsidies, they have typically raised the rents as soon as they were allowed to do so. An Indigenous participant said, **"My parents lived in a building that was built with temporary affordability criteria. Now the landlords are raising the rent on all these seniors, [and] they are all trying to find another place to live."** In other words, even the small percentage of genuinely affordable homes built so far under the NHS are not permanent additions to the amount of affordable housing available in Canada.

3.2 LACK OF PRIORITIZATION OF DIVERSE GROUPS OF WOMEN, TWO SPIRIT, TRANS, AND GENDER-DIVERSE PEOPLE IN THE NATIONAL HOUSING STRATEGY

The Federal Housing Advocate told the panel that private market incentive programs under the NHS do not include “intersectional and gender-based targets or accessibility criteria.” Other participants in the review process also commented on the lack of systematic monitoring and evaluation of how federal policies and programs are actually “improving housing outcomes for persons in greatest need”, including women, Two Spirit, Trans, and gender-diverse people of different origins.

A submission from the 519, a 2SLGBTQQIA+ community centre in Toronto, notes the contradiction between federal commitments to prioritize housing for Two Spirit, Trans, and gender-diverse people and how the NHS has actually been implemented. The 519 points out that as of 2024 – seven years into the National Housing Strategy – the federal government has only committed funding for 148 housing units specifically intended for Two Spirit, Trans, and gender-diverse people.

The 519 and other participants also expressed concern that policymakers continue to rely on statistics about homelessness that are derived from data on shelter use. Participants emphasized that **“couch surfing” with friends and family and other forms of hidden homelessness are a critical and widespread dimension of homelessness, particularly as experienced by women, Two Spirit, Trans, and gender-diverse people.** For reasons set out in the section above, a great many women, and especially Two Spirit, Trans, and gender-diverse people, do not feel safe or welcome in the shelter system and as a result are excluded from assessments based on shelter use.

Participants called for strengthening the National Housing Strategy Act with concrete objectives, deadlines, and accountability measures, along with the adoption of equally rigorous right to housing legislation by all provinces and territories. University of British Columbia researcher Alex Flynn said, **“Canada must embed housing rights into legislation with timelines, targets, and teeth.”**

The 519 urged further disaggregation of planning, monitoring, and evaluation to specifically address the needs of Two Spirit, Trans, gender-diverse people, noting:

“...housing barriers faced by 2Spirit, Trans women, Trans men and gender non-conforming people greatly differ from housing barriers impacting cisgender women. To realize the right to housing for Two-Spirit, Trans and gender-diverse people, we must be responsive to the unique vulnerabilities of transphobic violence and discrimination; lack of inclusive and culturally responsive housing; and structurally gendered shelter spaces and processes.”

3.3 POLICY GAPS AND DISCRIMINATORY IMPLEMENTATION

A number of submissions raised concerns over unintended impacts of Canada's National Occupancy Standards (NOS). Researchers and housing advocates noted that the NOS makes Eurocentric and heteronormative assumptions about housing needs that are starkly different from the values and priorities of many families seeking housing, including Indigenous families and recent immigrants. Although the NOS are meant only as guidelines, participants said in practice many housing providers apply the guidelines as though they were strict, inflexible rules.

Researcher Alina McKay stated that the NOS **"limit choice, delay access to safe housing, and often place women in unsafe or unaffordable environments."**

Neha also heard accounts of landlords using the NOS as grounds to evict families. First Call Child and Youth Advocacy Society stated that misuse of the NOS disproportionately impacts "Indigenous families, newer immigrant families, and families managing disabilities."

The NOS are among a number of federal standards and policies that participants said need to be reviewed and updated on the basis of a gender-based plus, human rights analysis.

Participants specifically highlighted the lack of mandatory accessibility standards for buildings and renovations as a critical factor contributing to the severe shortage of housing suitable for people with disabilities. In their joint submission, YWCA Moncton, Saint John Human Development Council and Crossroads for Women stated that the 2019 Accessible Canada Act "does not currently apply to most housing providers, leaving a significant gap in the application of consistent accessibility standards."

The National Building Code of Canada applies only to new multi-unit residential buildings and sets only **"limited accessibility standards – many of which are insufficient."**



3.4 POOR COORDINATION ACROSS DEPARTMENTS AND ACROSS JURISDICTIONS

Overall, participants said that the federal government has failed to advance a comprehensive and coordinated national approach to fulfilling the right to housing. Participants described poor integration of the right to housing across federal departments and inadequate coordination between the federal government and Indigenous governments, provinces, territories, and municipalities. The result is a “mish mash” of conflicting priorities, policies, and eligibility requirements.

Participants said that non-market housing and emergency shelter providers are caught in the gap created by the poor alignment between federal programs and provincial and municipal priorities and procedures. For example, federal funding is often restricted to capital costs while the provision of wrap-around supports depends on diverse sources of provincial funding. Different levels of government – and different programs within the same government – may have divergent eligibility requirements and funding cycles.

In addition, participants pointed to inadequate coordination and cooperation with municipalities which creates bottlenecks in implementation of federal housing priorities. These participants expressed that municipalities had slow permit processing times and often provided “unwanted land” to develop housing such as land that is associated with high development costs or requirements (e.g., high fees for water & sewage hook ups, traffic study requirements, etc.). Participants said there needs to be more incentives for municipalities to work cooperatively with Indigenous and community housing and shelter providers.

Participants were also critical of federal, provincial, and territorial governments’ use of short-term funding when long-term planning is needed. Heather Cameron, Ontario Native Women’s Association, said, **“Our lives are not projects. We can’t keep Indigenous women housed through short-term, project-based funding.”** Alex Nelson, University of Western Ontario researcher and lived expert said, **“A lot of resources go into pilot projects that give people access to something that is really hopeful and promising and then that service gets cut and people are further destabilized.”**

3.5 LONG-STANDING FAILURE TO UPHOLD FIRST NATION, INUIT, AND MÉTIS HOUSING RIGHTS

Neha also heard that funding levels for Indigenous housing have long been out of step with actual needs, whether within First Nations, Inuit, and Métis communities or in urban communities.

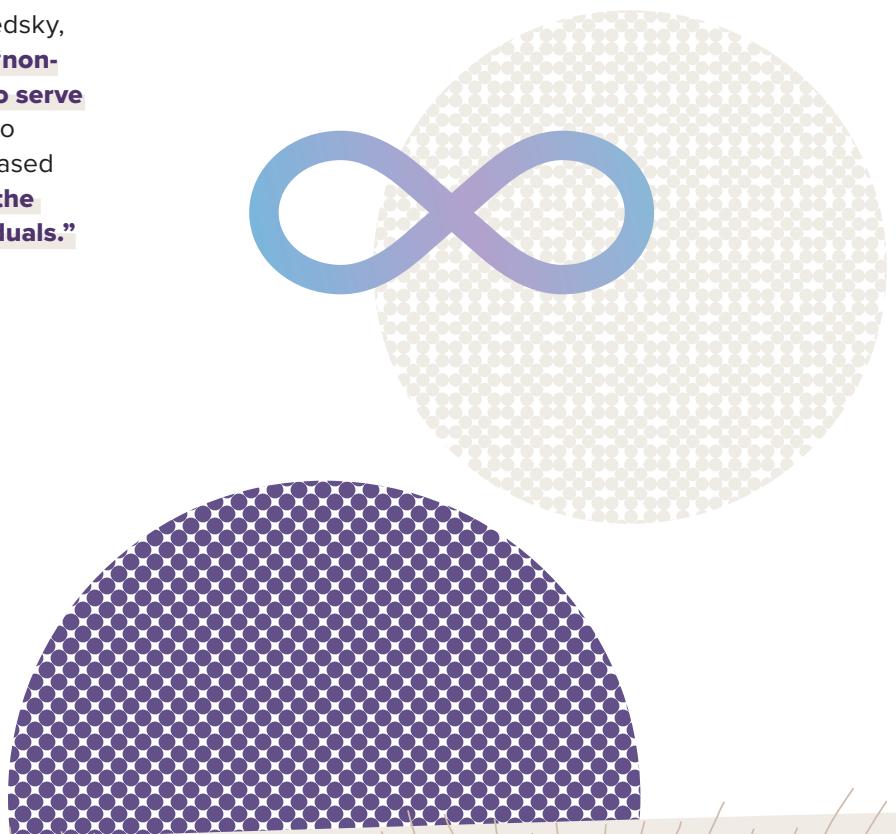
Persistent federal under-funding to housing and related infrastructure on reserve has led to a situation where there is a severe shortfall in numbers and size of housing, and much of the existing housing is in such poor repair that it should not be in use. One person said, **“We need a rigorous and equitable standard for housing on- and off-reserve, with funding to enable it.”** Pauktuutit said that the cost to address the housing and infrastructure gap in Inuit Nunangat is estimated to be \$75 billion.

The Aboriginal Housing Management Association (AHMA) stated that while the high levels of violence faced by Indigenous women, girls and 2SLGBTQQIA+ persons “has been long documented and increasingly publicized in Canada”, this awareness “has not informed the planning of housing interventions.”

Participants criticized federal, provincial, and territorial governments for funding non-Indigenous organizations to provide housing for Indigenous people. Diane Redsky, MMIWG2S+ Urban Indigenous Action Group, said, **“non-indigenous providers continue to get resources to serve our people, and they do it poorly.”** Participants also spoke of the importance of access to distinctions-based services: **“Pan-Indigenous supports do not meet the needs of Métis women and 2SLGBTQQIA+ individuals.”**

Participants said Indigenous housing providers often struggle to access the capital and credit needed to participate in federal housing programs. Requirements for accessing federal funding are “outdated”, “siloed”, and “over-the-top rigid.” In addition, the Urban Indigenous Action Group said funding that is ear-marked only for housing and programs specific to either First Nations, Inuit, or Métis is often inaccessible to urban organizations which serve all Indigenous community members.

Many participants were also highly critical of long delays in releasing funds for Indigenous housing already allocated under the federal Urban, Rural, and Northern Indigenous Housing Strategy. Jocelyn Formsma, National Association of Indigenous Friendship Centres, said, **“By now we could have had a lot of units built and a lot of people living safely in them.”**



3.6 GAPS IN INCOME SUPPORTS AND OTHER ASSISTANCE

In addition to these critiques related to the supply of affordable housing, participants said that governments in Canada are not doing enough to ensure income levels keep up with the cost of housing and other essentials. Participants spoke in particular about the inadequate income provided through benefit programs, and the harmful impact of policies that “claw-back” income support from people eligible for multiple supports.

People rely on social assistance programs to cope with the impacts of inequities such as inadequate wages and employment discrimination. The cornerstone human rights treaty affirming the right to housing, the International Covenant on Economic, Social and Cultural Rights, also affirms a universal right to adequate social assistance programs consistent with the dignity of all people. The right to social assistance and the right to housing are closely interconnected.

However, in the dialogue process, many described wide gaps between social assistance income and the real-world cost of rent and the claw-back of benefits that could make the difference between being housed and unhoused. Other participants shared that some essential support programs disqualify people in greatest need, such as full-time caregivers and recent immigrants and refugees.

Sherry Caldwell, a lifetime caregiver to her 20-year-old daughter, said that although people caring for family and loved ones with a disability **“frequently must reduce working hours or leave employment altogether,”** they are excluded from many benefit programs. She said that in the current housing market, these economic inequalities leave the caregiver and their loved one **“reliant on precarious housing arrangements or at risk of homelessness.”**

Neha also heard from refugees and asylum seekers who, after fleeing homophobic, anti-Trans, and gender-based violence in their home countries, arrive in Canada only to discover that there is no support to help them find and afford housing. Furthermore, refugees and asylum seekers face delays of six to eight months to obtain work permits. Many are forced to stay in shelters because there is no housing available at rents they can afford.



3.7 BARRIERS TO ELIGIBILITY & ACCESS

Neha repeatedly heard that there were barriers to accessing programs and supports. One person commented, **“I know for a fact that there is a lot of supports out there, but a lot of them have systemic barriers that stop people from properly being able to access them.”**

A recent refugee described arriving in Canada with their family and having no place to go. Canadian Border Services Agency officials at the airport had given them numbers for shelters, but all the shelters were full. This was in the middle of winter. They slept in the airport for the first night. They said, **“When you are fleeing and your visa comes, you do not have time to plan housing and everything.... I don’t know what we expected but we didn’t expect to just be given numbers to call. There should be a plan before I step foot here.”**

Another participant told the review panel that people who are living unhoused or in precarious housing are forced to deal with systems that are adversarial and punitive. They said, **“I have to go to battle and stand up and advocate for my very existence, fighting the gate keeper/caseworker for every penny of money I receive.”**

An immigrant woman of colour working in the Northwest Territories commented on the lack of supports responsive to the unique challenges faced by immigrant women, Two Spirit, Trans and gender-diverse people including language barriers and precarious immigration status.

Neha also heard how eligibility requirements and other restrictions on accessing shelters, housing with supports and other supports often contravene the universality of the right to housing.

Examples include:

- Eligibility linked to sobriety, not taking drugs, or taking part in specific programs.
- Requirements for ID and other documentation that may be unavailable to people who have fled violence, who are living unhoused, who been institutionalized, or who have come to Canada as asylum seekers.
- Practical issues of the distance between where people live and where services can be accessed.
- Frontline staff who don’t engage in empathetic, trauma informed ways or who are too overworked to treat people with the care they deserve.

Indeed, eligibility criteria for accessing women’s shelters vary widely, often reflecting differences in how provinces and territories define violence against women. A 2019 Elizabeth Fry Society study submitted to the panel noted that in many jurisdictions, only women, Two Spirit, Trans and gender-diverse people fleeing an immediate threat of violence in the home meet the eligibility requirements of women’s shelters, excluding those escaping other violent situations, such as violence in the street, and those coping with a traumatic history of prior abuse.⁶

⁶ Kozorys, M., Campbell, S., Schiff, R., Moller, H. & Scharfe, D. (2019). *Housing Insecurity and Justice System Involvement among Women in the Thunder Bay Region*. Thunder Bay, Ontario: Elizabeth Fry Society of Northwestern Ontario.

A housing academic with lived experience suggested that **“Housing is not something to which conditions should be attached. We have to lose the idea that suitable housing is an award for compliance.”** For example, many participants described the challenges of finding social housing when you’re in a relationship. Eligibility requirements may prevent co-habitation and building rules often prohibit overnight guests.

One person who described themselves as a young senior on disability wrote, **“It’s not fair that you would have to sacrifice someone who supports you emotionally to have housing for the night... There shouldn’t be a forced choice between housing or maintaining your relationship.”**

Neha heard about long and complex forms required by each program and support and the need to complete separate applications for each service and support. The Canadian Centre for Housing Rights noted this creates particular barriers for people dealing with mental health issues. One participant asked,

“How many doors do people need to open between needing the service and having the service?”

Lived experience experts indicated that this exhaustive process required them to provide the same information over and over again to different agencies and service providers, even though there are already positive examples of central access points and information sharing among service providers that could better streamline the process. Tara Slade-Hall, DisAbled Women’s Network, said, **“One of the hardest things about finding housing is the application process. The applications are ridiculous. It feels like a test. Like if you need it desperately enough, you’ll figure it out. The trouble is that the people who are most desperate are busy just trying to survive.”**

This exhaustive application process is acute for those applying for refugee status. Many participants asked why information they have provided in the application process wouldn’t be shared with other government departments and agencies so that refugees could be automatically connected with the benefits and housing supports that they need. A queer refugee claimant said, **“All these government departments need to talk to each other so there’s a flow of information.”**

3.8 DISCRIMINATION IN THE PRIVATE MARKET

Neha also heard about barriers to renting in the private housing market, including widespread discrimination and violations of tenant rights.

Participants shared that the documentation required by landlords can be a significant barrier to many marginalized people such as credit checks, rental histories, references, and guarantors. First Call Child and Youth Advocacy Society stated, **“Women with children fleeing violence often struggle to rent new places because they do not have references, due to their not having been a renter for a long time.... Landlords routinely run credit reports for prospective tenants, so this single factor can prevent a woman from securing safe housing for her children.”**

Neha also heard from refugees and asylum seekers who said their rental applications have been denied because they don't have access to documents from their home country and have not established a rental or credit history in Canada. One said, **“It's like they won't give you a first time rent without [already having had] a first-time rent.”**

A survey carried out by the First Call Child and Youth Advocacy Society found that the amount or source of income, including receiving social benefits, was the most common reason for landlords rejecting rental applications. This disproportionately impacts Indigenous families, immigrant and refugee families, racialized families, single mothers, and people with disabilities. There is also widespread, explicit refusal to consider applications from families with children as well as rejections based on the number and age of children.

The Canadian Centre for Housing Rights said that single mothers, Indigenous people, and people from racialized communities are often asked to provide more documentation than required of other applicants, face demands for higher deposits or be asked to agree to other discriminatory conditions before a landlord will accept their application. Métis National Council said, **“2SLGBTQQIA+ Métis often face discrimination when searching for housing, being denied housing they would otherwise qualify for once the landlord learns they are part of the 2SLGBTQQIA+ community.”**

3.9 FINANCIALIZATION AND EVICTIONS

People with lived experience of homelessness described being arbitrarily evicted from rent-controlled leases so that their landlords could significantly raise the rent for new tenants. An older woman said she was illegally evicted from her apartment but couldn't prevent it because the landlord "held all the cards." Participants also talked about the disappearance of affordable units as properties purchased for investment purposes are renovated and returned to the market at much higher rents.

The Women's National Housing & Homelessness Network wrote, **"Across the country, large investment firms are rapidly purchasing deteriorating apartment buildings, social housing, mobile homes, and other distressed rental properties, only to renovate and redevelop this housing into luxury units, short-term rentals, high-end rental housing, or other investment opportunities."**

Campaign 2000 noted that as of 2023, between 20 and 30% of purpose-built rental housing stock was owned by investment firms.

City for All Women Initiative cited an Ottawa study that found an "unprecedented" 483% increase in evictions for demolitions, repair, or conversion between 2019 and 2022.⁷ Réseau des Tables régionales de groupes de femmes du Québec stated that renovictions have soared in Quebec and that, in the last two decades, more than half of rooming houses have disappeared from the Island of Montreal after being converted into apartments.

Widespread financialization of the rental market means that people who have been subject to a "renoviction" are often unable to find housing in their former neighbourhood and may not be able to find housing anywhere. When specific neighbourhoods are targeted for financialization, a disproportionate number of women, Two Spirit, Trans, and gender-diverse persons lose access both to affordable housing and to the supports based in those communities.

Campaign 2000 wrote,

"Displacement leads to several negative consequences on families including being forced into unsafe or unaffordable housing, disconnected from schools and community supports and unable to pay for basic needs because a disproportionate amount of their paycheck is spent on moving expenses and rent."



⁷ Troster, A. (2024). [Council Member Inquiry Form: Issuance of N5, N12, N13, and AGIs at the Landlord Tenant Board in Ottawa](#)

3.10 LACK OF TIMELY OR EFFECTIVE RIGHTS PROTECTIONS

Discrimination against prospective tenants, failure to maintain properties, harassment of tenants, and arbitrary rent hikes and evictions are all potential grounds for action either through provincial and territorial tenant protection programs or under provincial and territorial human rights legislation. However, the panel repeatedly heard that these protections are not working in practice.

Ingrid Palmer, Realize Canada, spoke about the lack of enforcement of legislated protections for people with disabilities. She said, **“Landlords have no fear of the existing systems. They can discriminate with impunity. They know the systems are so long and onerous that you’re going to be worn out or, in the end, they’re going to get away with a little tap on the hand.”**

Filing a complaint is too complicated, adjudication takes too long, and the forms of compensation or redress offered through these systems are not sufficient to make up for the impacts of being denied or evicted from housing. Brad Evoy, Disability Justice Network of Ontario, said people with disabilities who try to access existing human rights protections **“are not experiencing justice.”**

3.11 THE SHELTER SYSTEM IS UNDER-FUNDED AND UNSAFE

In a joint submission, West Coast LEAF and SNOW said that while emergency shelters cannot, in their own right, fulfil the right to housing, “a safe, adequate, and gender-sensitive emergency shelter system” can serve “as both a safe haven and a steppingstone to stable, long-term housing.” Throughout the review, however, Neha heard a wide range of concerns over Canada’s reliance on the shelter system as the first line of protection for people experiencing homelessness or housing insecurity.

Critical concerns include:

- The absence of shelters and transition homes in many communities, especially Indigenous, rural, and northern communities.
- Shelters and transition homes stretched beyond capacity by a combination of underfunding and high demand, resulting in people being turned away and shelters unable to offer adequate services.
- Unsafe conditions for women in co-ed homeless shelters.
- Shelter staff who are overworked and subject to unsafe working conditions.
- Shelters that are unsafe and unwelcoming for Two Spirit, Trans, and gender-diverse people.



Talking about the fact that most Indigenous communities are a long way from the nearest shelter, Josie Nepinak, Native Women's Association of Canada, said that when Indigenous women, Two Spirit, Trans, and gender-diverse people have to leave their home communities to access shelters, “**they are leaving their supports, they're leaving their language, they're leaving ceremony, they're leaving everything they know. I know first-hand that this does not work for Indigenous women because ultimately, the women go home.**” Pauktuutit spoke of the dangers Inuit women and gender-diverse people face in urban centres due to a shortage of shelter beds.

The National Right to Housing Network described emergency shelters and transitional housing that “often fail to provide safe, inclusive, and dignified conditions. Issues such as overcrowding, lack of privacy, and inaccessible spaces prevent people from feeling secure or supported, leading some to avoid shelters altogether.” The Canadian Centre to End Human Trafficking stated that the central issue is that government investments “**have not kept pace with the need.**”

Neha heard widespread, serious concerns about the failure of the shelter system to meet the specific needs of Two Spirit, Trans, and gender-diverse people. Because the shelter system follows a rigid, binary division of “men’s shelters” and “women’s shelters” many Two Spirit, Trans, and gender-diverse people experience these spaces as being unsafe and unwelcoming. A lived experience expert said that shelters are often experienced as “**deeply violent spaces for Two Spirit, Trans, and gender-diverse people.**” A non-binary queer person with a disability told Neha, “**While most support trans women in theory, staff are often inadequately trained, and shelters aren't always safe for them unless they 'pass.' Other gender-diverse individuals (including trans men, nonbinary folks, and Two Spirit folks) often don't qualify under their mandates, unless they are willing to lie and hide their identities.**”

Participants also said that the value of dedicated Two Spirit, Trans, and gender-diverse spaces should not rule out or deter meaningful action to ensure all shelters and transition housing are welcoming and inclusive. In some instances, the most pragmatic or easily achieved solution to the emergency shelter needs of Two Spirit, Trans, and gender-diverse people is to change policies and practices of existing shelters or ensure new shelters and transition houses are designed from the outset to be inclusive, safe spaces.

Researcher Jayne Malenfant said that there is also a critical issue of agency and choice. Two Spirit, Trans, and gender-diverse people should never be turned away from women’s shelters. Regardless of whether there are services available that are specific to the 2SLGBTQQIA+ community, they must be free to determine for themselves what service or space they want to access.

CCHR notes while governments have a responsibility to ensure that all emergency accommodations “protect people’s dignity, meet all safety and security requirements and offer pathways towards obtaining adequate housing, “emergency shelters can never “constitute adequate housing under international law.” City for All Women Initiative points out that widespread and growing reliance on temporary shelters reflects a failure to uphold the right to housing in the face of “**feminization of poverty, systemic racism, and discrimination.**”

4 Action



Measures that all levels of government can and must take to uphold their human rights responsibilities

“

“We know what needs to be done. The issue is political will.”

– Michele Biss, National Right to Housing Network

The ultimate objective of the Neha panel is to catalyze government action to advance the right to safe, adequate, and affordable housing. Action that is urgently needed to protect the rights and lives of women, Two Spirit, Trans, and gender-diverse people and to ensure that they and their families have the opportunity to live in healthy, supportive, and culturally appropriate homes and communities.

This section of the report summarizes the wide range of recommendations shared by lived experts and the organizations that support them. This section begins with some of the overarching recommendations that participants told us must inform the development, implementation, and assessment of all government actions. This guiding framework is followed by more specific recommendations related to government housing policy and its implementation, social housing, housing rights in the private sector, affordability, and emergency housing and shelters.

Note that these specific recommendations represent a wide spectrum of views heard during the process. Inclusion here is not meant to imply that there was necessarily consensus among participants.

Neha has formulated its own separate body of recommendations – some of which overlap with those set out below and some of which are distinct. Neha’s recommendations can be found in the Panel’s final report.⁸

⁸ National Housing Council. (2025). [“We’re human beings. We deserve a place to live. It’s that simple.”: the final report and recommendations of the Neha review panel.](#)



4.1 GUIDING FRAMEWORK FOR REALIZING THE RIGHT TO HOUSING FOR ALL WOMEN, TWO SPIRIT, TRANS, AND GENDER-DIVERSE PEOPLE

Participants were clear that all housing policy and programs must be consistent with Canada's human rights obligations and the Government of Canada's legislated commitment to **"focus on improving housing outcomes for persons in greatest need."** Housing policy should be focused on fulfilling the right to housing and addressing the deep, core housing need of all communities, not just ending homelessness. The guiding framework set out below would apply to all the other recommendations that follow.

- All governments should establish formal and appropriately remunerated mechanisms for lived experts, including women, Two Spirit, Trans, and gender-diverse people of diverse origins to be part of the development, implementation and assessment of housing strategies.
- Concrete measures must be taken to ensure all housing programs and policies are rights-based and consistent with Canada's international human rights obligations. This includes:
 - Applying rigorous intersectional gender-based analysis plus (GBA+) assessment.
 - Developing specific goals and indicators responsive to the needs and perspectives of diverse communities, including Two Spirit, Trans, and gender-diverse people and Indigenous Peoples.
 - Consulting and cooperating with Indigenous Peoples to identify and address implications with respect to First Nations, Inuit, and Métis rights, including the right to self-determination and inherent jurisdiction in respect to lands, territories, and resources.
- Concerted effort must be made to fully implement the outstanding recommendations of past inquiries and studies, such as the Calls for Justice of the National Inquiry into Missing and Murdered Indigenous Women and Girls. This includes recommendations directly related to housing needs as well as those establishing the essential context of safety and wellness necessary for enjoyment of the right to housing.

4.2 EMPOWER COMMUNITIES TO LEAD HOUSING SOLUTIONS

“It’s clear that Indigenous housing providers already hold solutions to Indigenous women’s housing needs, but what’s missing is sustainable investment, whether it’s capital funding, or funding for capacity building or operations.”

– Amelie Laine, *Regroupement des centres d’amitié autochtones du Québec et de la Société immobilière du RCAAQ*

To be consistent with Canada’s human rights obligations, government programs and policies should empower Indigenous and community-based organizations to build culturally appropriate housing, in complete communities, with the necessary social infrastructure. Neha heard that communities know their needs better than anyone else and, with the appropriate resources and supports, are best placed to design and implement effective housing solutions.

Align funding models with community needs

- Adopt flexible funding approaches to remove eligibility barriers for small-scale, equity-focused partners – non-profits, women-led, Indigenous-led, 2SLGBTQQIA+-led, and organizations in rural, remote, and mid-sized communities.
- Prioritize funding for initiatives that employ lived experts in leadership positions and in peer support roles.
- Multi-year funding should be the norm.
- Invest in community-led technical support and skill/capacity-building.
- Ensure all federal investments include community benefit agreements along with a monitoring and assessment strategy to ensure women, Two Spirit, Trans, and gender-diverse people have equitable access to jobs and benefits.

Meet the needs of urban Indigenous communities

- Immediately release funds already committed to the Urban, Rural, and Northern Indigenous Housing Strategy (URN).
- Expand investments in URN to meet the target of \$56 billion over ten years proposed by the National Housing Council.
- Ensure other funding streams for urban housing construction and maintenance are accessible to Indigenous, community-based organizations.

Uphold self-determination of First Nations, Inuit and Métis in housing

- Consistent, permanent funding should flow through existing agreements, so that First Nations, Inuit Treaty Organizations, and Métis governments can develop programming specific to their region.
- Make funding processes non-competitive so that smaller communities with lower capacity are not shut out of resources.

4.3 SIGNIFICANTLY INCREASE INVESTMENT IN SOCIAL, PUBLIC, AND INDIGENOUS HOUSING

“I see all sorts of condos going up... housing complexes going up... but none of that is helping or decreasing the homeless issue.”

Experience shows that government support for private market construction does not address the needs of those most at risk. Lived experts, and organizations that support them, have made a clear call for government to shift emphasis and redirect resources to support social, public, and Indigenous housing.

- Significantly increase non-market housing in all communities:
 - Expand non-market, social housing to a minimum of 20% of Canada's housing stock.
 - Address zoning restrictions that slow or prevent non-market housing construction in neighbourhoods close to essential amenities and supports.
 - Establish a comprehensive inventory of public lands that are both available for housing development and would be suitable for construction of supportive, non-market housing.
- Ensure that social housing includes a diversity of sizes and configurations, prioritizing housing suitable for families and intergenerational living.
- Ensure that all publicly funded housing is:
 - Safe, secure, and private
 - Fully accessible and conducive to aging in place
 - Well maintained
 - Culturally appropriate
 - Includes space and permission to have visitors
 - Located in safe and healthy neighbourhoods
 - Close to essential amenities such as day care, grocery stores, and medical clinics.
- Maintain and expand current rapid housing programs:
 - Prioritize housing for women, Two Spirit, Trans, and gender-diverse people escaping violence, including a specific strategy to ensure the distinct needs of Two Spirit, Trans, and gender-diverse people are met and supported.
 - Adopt a wider, more inclusive definition of gender-based violence that includes violence outside the home or outside of intimate partner relationships.



4.4 MAKE HOUSING SUPPORTS MORE ACCESSIBLE TO THOSE IN GREATEST NEED

Neha heard countless success stories of women, Two Spirit, Trans, and gender-diverse people who have been helped to find and retain housing with supports and the work of community agencies. Neha also heard widespread consensus that there was not enough housing with supports and services and that if they did exist that they were much too difficult to access.

- Increase investment in housing with supports that provides culturally safe, trauma-informed, and confidential wrap-around supports that are readily accessible to all occupants, and are provided on-site wherever possible, including:
 - Counseling and wellness support
 - Legal assistance
 - Peer-mentoring and leadership
 - Harm reduction programming
 - Access to gender affirming care and space for recovery afterward
 - Financial literacy and life skills training
 - Ready access to other community services and infrastructure such as health centres and seniors' centres.
- Ensure that participation in supportive programming is strictly voluntary, and that the decision not to participate is not a barrier to obtaining housing.
- Harm reduction approaches should be applied to all supports that are provided: being non-judgemental or meeting people where they are at and reducing or eliminating conditions for accessing supports.
- Establish financial supports to stabilize housing, including emergency assistance to make rent payments, to help furnish a home, and address other urgent needs.
 - Provide specific stabilization supports for youth leaving care or who cannot remain in their group housing situation because of discrimination or other reasons.
- Provide long-term, sustained funding for low barrier drop-in centres and other community spaces to meet the needs of people living unhoused or in precarious housing situations.
- Make finding and accessing housing and related support easier:
 - Implement single point of contact systems for all housing and housing supports, eliminating the need to contract multiple providers and complete multiple applications.
 - Streamline the application process, eliminating requirements to provide complex personal histories and documentation.
 - Ensure all people receiving disability benefits are automatically in the system so that they do not have to separately establish eligibility for housing supports.
 - Employ peer supports to help navigate the system.
 - Establish specific outreach programs for people leaving institutions and youth care.

4.5 RAISE INCOMES TO MAKE QUALITY HOUSING TRULY AFFORDABLE FOR ALL

In addition to substantially increasing the supply of deeply affordable housing, Neha heard an urgent call to raise incomes – especially benefit programs – in keeping with the real-world costs of housing. As noted above, the key international human rights instrument affirming the right to housing also affirms a universal right to social security which is closely interconnected with the right to housing.

Here are some of the income-based solutions proposed by the Neha participants to make quality housing more accessible:

- Establish a universal, guaranteed minimum income.
- Raise the levels of all benefits and support programs to reflect the actual cost of housing.
- Establish specific benefits for long-term caregivers, including those providing care for children with disabilities, and older parents.
- Eliminate claw backs that bring combined benefit payments below levels needed to obtain suitable housing.



4.6 ENSURE FEDERAL HOUSING POLICY IS GENUINELY RIGHTS-BASED AND PRIORITIZES THOSE IN GREATEST HOUSING NEED

The NHSA requires the Government of Canada to advance the progressive realization of the right to adequate housing. This means investing maximum available resources to remedy current gaps and failings in the housing system, including laws and regulations, prioritizing those in greatest need.

While participants in the review process spoke specifically about programs and initiatives already announced and underway during the Neha dialogues, the following recommendations are also highly relevant to more recent initiatives, such as Build Canada Homes, and others that may be under development.

Ensure implementation of the National Housing Strategy is consistent with Canada's human rights obligations.

- Conduct a ministerial level review of whether programs and initiatives under the NHS are consistent with the requirement of the Act and Canada's human rights obligations.
- Shift the balance of direct funding and incentives under the NHS to housing that is affordable to those in greatest core housing need, including households led by women, Two Spirit, Trans and gender-diverse people.
- Establish a specific gender-focused stream within the National Housing Strategy and/or a specific action plan to end homelessness for women, Two Spirit, Trans and gender-diverse people.
 - Set concrete targets and timelines for this plan and publicly report on progress toward achieving these targets.
- Appoint a specific housing advocate for Two Spirit, Trans, and gender-diverse housing rights.

Uphold Indigenous jurisdiction with respect to housing and land.

- Implement the Federal Housing Advocate's call for the federal government to work in cooperation with Indigenous governments to establish frameworks for transferring funding authority for housing programming when and as desired.
- Consistent with the requirements of the UN Declaration on the Rights of Indigenous Peoples, consult and cooperate with Indigenous Peoples to establish fair and transparent mechanisms to restore lands to Indigenous jurisdiction, including lands currently under private ownership.

Promote national legal standards for the right to housing.

- The federal government should establish a minimum national baseline for protecting the right to housing and require that all jurisdictions meet or exceed this baseline as a condition of transfer payments and eligibility for federal programs.
- All provincial and territorial governments must enact legislation that formally affirms their commitments to upholding and fulfilling the right to housing.
- Housing rights standards must include prohibition of discrimination based on gender identity, size of family, immigration status, disability, receipt of income assistance of any kind, or on a survivor's history of violence or coerced debt.

4.7 ADOPT CONSISTENT, HUMAN RIGHTS-BASED DEFINITIONS OF AFFORDABLE HOUSING AND CHRONIC HOMELESSNESS

“We reject definitions of homelessness that hide gendered violence, that assume choice where there is coercion, and that normalize systems that punish poverty rather than addressing its root causes.”

– Arlene Haché, Chair, Women’s National Housing and Homelessness Network

How governments define key concepts such as affordability and chronic homelessness can have a profound impact on whether or not programs meet the needs of women, Two Spirit, Trans, and gender-diverse people. During the review, Neha heard repeated concerns that inconsistent and inappropriate definitions are directing government resources to housing that is not genuinely affordable, are contributing to the invisibility of the housing needs of women, Two Spirit, Trans, and gender-diverse people, and are excluding many from accessing critical programs.

- Adopt a consistent definition of affordability across all components of the National Housing Strategy that is linked to income rather than average market rates.
 - Most suggested that affordable housing should be defined as housing that costs no more than 30% of the income households in core housing need. Some suggested a lower percentage of 25%.
- For the purpose of eligibility to programs and supports, redefine chronic homelessness to reflect experiences of hidden homelessness common to women, Two Spirit, Trans, and gender-diverse people.



4.8 ENSURE ACCOUNTABILITY FOR UPHOLDING HUMAN RIGHTS THROUGH MONITORING AND ASSESSMENT

Participants told Neha that in order for government housing policies and programs to benefit those in greatest need, all initiatives must be assessed, monitored and evaluated on an ongoing basis using data that disaggregates the distinct needs and experiences of women, Two Spirit, Trans, and gender-diverse people, including those who are Indigenous, live with disabilities, are racialized, or are newcomers.

- Monitoring should track actual outcomes for women, Two Spirit, Trans, and gender-diverse people, not just inputs into the housing system such as dollars spent or housing starts.
- Support community-led initiatives to implement gender-sensitive research methods that move beyond the shelter-focused Point in Time surveys and that can gather disaggregated data reflective of the differing experiences and needs of cis-gender, straight women and Two Spirit, Trans, and gender-diverse people.
- Adopt and apply the HART Housing Needs Assessment framework.⁹

4.9 ENSURE NATIONAL STANDARDS AND BUILDING CODES ARE CONSISTENT WITH HUMAN RIGHTS OBLIGATIONS

Participants highlighted two critical areas where urgent review and reform of national policies and standards is needed to remove barriers to fulfilling the right to housing for women, Two Spirit, Trans, and gender-diverse people:

National Occupancy Standards (NOS)

- Provide immediate clarification that the NOS is intended only as guidance and should not be treated as a mandatory rule.
- Conduct a review of the NOS with the participation of lived experts.

National Building Code

- Revise the National Building Code to establish mandatory accessibility standards for new construction and maintenance.
 - Require that all housing receiving government funding be built to universal design standards.
- Work in collaboration with Indigenous Peoples to remove barriers to use of traditional materials and construction techniques.
- Prioritize sustainability and climate resilience.

9 University of British Columbia. (2025). [Housing Assessment Resource Tools \(HART\)](#).

4.10 STRENGTHEN COORDINATION ACROSS DEPARTMENTS AND JURISDICTIONS

Participants called for formal measures to improve coordination within the federal government and between the federal government and other jurisdictions to decrease the systemic barriers faced by women, Two Spirit, Trans, and gender-diverse people.

- Ensure civil servants in all relevant departments receive training in housing as a human right.
- Establish an interdepartmental working group to coordinate policies and programs related to housing.
- Work with Indigenous and provincial and territorial governments to ensure complementarity of funding programs to eliminate gaps and eligibility barriers.

4.11 END CHILD APPREHENSIONS RESULTING FROM THE FAILURE TO UPHOLD THE RIGHT TO HOUSING

The participants identified that children should never be placed in state care because governments have failed to ensure that all families have access to quality, affordable housing. Many participants provided recommendations to ensure housing policy was not a barrier to the reunification of families.

- Establish emergency supports so that families are able to provide adequate housing for their children.
- Establish legislation, policies, training, and resources to ensure that if housing is deemed inadequate, child welfare agencies assist families in accessing housing supports as the first and preferred line of response.
- In circumstances where a child is temporarily taken into care, ensure that assistance and benefits available to the family are not reduced so that they can maintain housing suitable for the child's return.
- Families needing larger, more stable accommodation in order to qualify to be reunited with their children should be prioritized for rapid housing and other housing programs.



4.12 BREAK CYCLES OF HOUSING INSECURITY, CRIMINALIZATION, AND INCARCERATION

The following recommendations focus on the successful reintegration of those who have been incarcerated, aiming to break the cycles of housing insecurity and criminalization by reducing the number of Women, Two Spirit, Trans, and gender-diverse people being charged and imprisoned for acts of survival.

- Align federal correctional release policies and practices with the right to housing.
 - Review federal correctional release policies to identify and address release restrictions and release planning practices that unnecessarily restrict the access to and retention of adequate housing.
 - Providing housing supports for women, Two Spirit, Trans, and gender-diverse people transitioning out of provincial and federal institutions.
- Address safety and housing precarity in relation to sex work.
 - Sex work is work. Landlords should be prohibited from evicting tenants solely on the basis of engaging in sex work in their home.
- Adopt human rights-based drug policies that prioritize provision of care and reduce institutionalization and incarceration.



4.13 PROTECT HUMAN RIGHTS IN THE PRIVATE MARKET

Recognizing that the vast majority of housing is provided through the private market, the participants identified the critical need for all governments to act to ensure the affordability of private market housing and to protect the rights of tenants, especially those who are most likely to experience homelessness and housing precarity.

- Fully and immediately implement the Canada Rental Protection Fund to prevent purpose built affordable housing units in the private market being converted to higher rent units.
- All levels of government must include conditions for approval of new private market housing developments that ensure that a specified percentage of deeply affordable housing is maintained and that promotes “complete communities” where housing is located near amenities, services, and facilities.
- Establish provincial licensing requirements for landlords, including human rights training requirements and minimum maintenance standards.
- Landlords who advertise discriminatory rental requirements such as refusing to rent to families should face immediate fines.
- Strengthen rent controls and close loopholes that allow evictions for the purpose of raising rent.
 - Tie rent control to units rather than current tenants.
 - Limit rent increases to an annual percentage based on consumer price index.
 - Where tenants have had to leave an apartment for renovations and repair, recognize a right to return to their apartment at the same rent level.
- Regulate and discourage ownership of rental properties as investments including:
 - Closer tracking and public reporting of corporate and institutional ownership of housing stock.
 - Limiting the numbers of units that can be converted to the short-term rental market.
 - Ending tax breaks for housing investments like Real Estate Investment Trusts.
 - Establish specific taxes for vacant units as a disincentive for leaving apartments unrented while waiting for market prices to rise.
- Regulate and enforce restrictions on damage deposits and other rental conditions.
- Provide increased access to credit and targeted incentives to make home ownership more affordable and accessible to lower income families and individuals.
- Protect the right to housing through effective accountability mechanisms.
 - Ensure housing standards and tenant rights provisions apply to all accommodation, including fixed lease rentals, temporary accommodation, and social housing.
 - Ensure access to legal aid for all housing-related complaints.
 - Publicize rights of tenants and available recourse mechanisms.



4.14 IMPROVE EMERGENCY SHELTERS AND TRANSITION HOUSES

Despite the recognition by Neha participants that temporary housing such as shelters and transition homes are not adequate housing, the participants identified that emergency shelters are urgently needed and must be supported to meet the needs of all people, including Two Spirit, Trans, and gender-diverse people, and people in Indigenous, rural, and northern communities.

- Provide low-barrier and no-barrier options across the spectrum of emergency housing.
- Adopt “safe at home” policies and strategies to address the safety needs of women, Two Spirit, Trans, and Gender-diverse people without their needing to leave their homes.
 - This includes legal reforms to make it easier to remove perpetrators from leases or occupancy agreements.
- Adopt national standards for access, inclusion, and safety for all shelters.
 - Prioritize funding for shelters that can comply with the “National Human Rights-Based, Gender-Sensitive Standards for Emergency Shelters” proposed by the Canadian Centre for Housing Rights, National Right to Housing Network, and Women’s National Housing and Homelessness Network.
 - Additionally, staff should receive regular training to help identify the signs of trafficking, as well as how to support victims, and prevent human trafficking.
 - Shelters should be audited with the participation of lived experts.
- Increase overall funding for emergency shelters and transitional housing.
- Prioritize provision and maintenance of shelters and transitional housing in Indigenous communities and northern and remote communities.
- Funding should include capital costs of building new shelters and maintaining or expanding existing shelters, multi-year operational costs including staff training and supports to ensure culturally safe and trauma-informed service provision and retention of experienced staff.
- Shelters should be funded to offer critically needed wrap-around supports including counselling and grief counselling, sexual assault services, harm reduction, and overdose prevention.
- Establish specific funding streams for 2SLGBTQQIA+ designed and led shelters and transition housing for Two Spirit, Trans, and gender-diverse people.
- Provide specific emergency options for people escaping trafficking.
 - Make funding available for victims of human trafficking to travel to a safe house or shelter in another community, to help reconnect with family and home community or feel safer at a greater distance from the abusers.

Conclusion

“This can’t just be another report full of recommendations that sit on a shelf. We’ve already lost too many people.”

– Paulette Poitras, 2Spirits in Motion

Throughout this review, Neha heard countless stories about people who live every day with the fear of being evicted or having their children taken away because living in poor quality housing is equated with neglect. Accounts of women, Two Spirit, Trans, and gender-diverse people forced to remain in violent and exploitative situations because there is no other place to go and of people with disabilities being literally trapped in their buildings for months. Older adults who fear being institutionalized because it is simply impossible to find suitable housing where they can live independently.

More than fear and anxiety, Neha heard frustration and anger. Anger that the lives and well-being of women, Two Spirit, Trans, and gender-diverse people are not a priority. Frustration that necessary solutions identified by previous studies and inquiries are not being acted on.

Neha is conscious that the ultimate objective of this review panel is not to simply add to the wealth of reports and documents already available to decision-makers, but to try to use this opportunity to catalyze deep and meaningful change.

After hearing from so many women, Two Spirit, Trans, and gender-diverse people in communities across Canada, we are more convinced than ever that transformative change to the Canadian housing system is not only needed, but clearly and demonstrably achievable.

Alongside evidence of serious challenges, Neha heard compelling examples of human rights-based solutions already making a difference—initiatives led by communities that have transformed lives for women, Two Spirit, Trans, and gender-diverse people. These proven approaches deserve robust support and scaling across the country to drive systemic change. We want to conclude this report with a few of the many examples shared with us as a concrete illustration of the capacity and leadership that exists in communities across Canada.

For example, Jordy Ironstar, 2Spirits in Motion, said that the challenges or costs of providing specific services and spaces are often overstated. The growing number of examples of shelters and transition housing for Two Spirit, Trans, and gender-diverse people demonstrate what is achievable.

One participant described a positive experience of housing with supports in New Brunswick. They were provided with accommodations suitable for the size of their family. They paid rent based on their capacity to pay and had enough income left over that they could still afford other necessities. They said,

“There should be more places like that. I had a lot of food in the cupboards, I had everything I needed.”

One person shared a positive example of how they have been able to obtain housing geared to the actual income they receive from provincial disability supports. They said that they are able to make ends meet in part because the provincial child benefit that they also receive is “claw-back free” and doesn’t affect the level of their disability supports or the determination of their rent.

Many of the positive examples shared during the review were of programs and services developed at the community level and often led by people with lived experience of homelessness and housing insecurity.

Miyoskamin Second Stage Housing, run by the Native Womens’ Shelter in Montreal, provides wraparound supports including mental health, family reunification supports and legal supports. Participants have their own apartments where they can stay for three to five years. During this time, rent is set at 25% of their income.

NiGiNan Housing Ventures, Edmonton, is an Indigenous-led, registered charity serving individuals with complex medical and social needs who are often described as the ‘hardest to house’. Each of its four buildings was designed to reflect Indigenous cultural traditions and include features such as ceremonial spaces and accessible rooms. One of the priorities is to keep children together with family members and relatives.

The Two-Spirit Housing Project is community-led housing project in Halifax that will provide eight to 12 transitional units for Two Spirit people. The project is meant to be responsive to multiple scenarios, from a single night’s stay to staying as long as one year. The project is intended from the outset to provide housing that is culturally safe and which prioritizes privacy and confidentiality.

“The goal was to build a housing model that fits Two Spirit Indigenous communities’ needs and lifestyle, given that the models from CMHC and the government did not work.”

Marie McGregor Pitawanakwat Chair, National Indigenous Women's Housing Network, talked about CMHC-funded research into the traditional role of Indigenous women in building housing. The project is working toward creating training programs for Indigenous women, Two Spirit, Trans, and gender-diverse people to be able to build their own homes using a combination of traditional building methods and contemporary materials. She said,

“Pre-colonial Indigenous societies were egalitarian. Women built homes, moved homes. That knowledge hasn't disappeared, we're reclaiming it.”

Each of these examples, and many others shared with Neha, tell us that violations of the right to housing are not inevitable. **Canada has the means to fulfil the right to adequate housing for all. The federal government has made clear legal commitments that it will do so, prioritizing those in greatest need. What Canada needs to do now, is act on those commitments with all the resources that are available to it.**



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 and non-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.



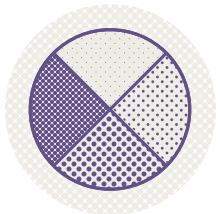
Woman's Nomination Belt

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. 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.

Neha



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