



**WRITTEN SUBMISSION FOR THE PRE-BUDGET CONSULTATIONS IN ADVANCE OF THE UPCOMING 2024
FEDERAL BUDGET
August 2, 2023**

WOMEN'S SHELTERS CANADA (WSC) STRONGLY RECOMMENDS THE FOLLOWING:

RECOMMENDATION 1

That there be an investment, of a minimum of \$600 million, over the next four years, in Canada's National Action Plan to end Gender-Based Violence (NAP) for the development and implementation of the federal components, actions, and responsibilities of the NAP to be reflected in the federal GBV Strategy.

RECOMMENDATION 2

That the government establish and fund an independent oversight body to act as an accountability mechanism to monitor and report on the implementation of the National Action Plan to End Gender-Based Violence and the federal GBV Strategy.

RECOMMENDATIONS 3

That the [Women and Children's Shelter and Transitional Housing Initiative](#), announced in Budget 2021 and housed at CMHC, be renewed as an ongoing initiative of the National Housing Strategy.

In Budget 2024, we recommend that an allocation be made to this initiative in the amount of:

- \$250 million in capital funding
- \$75 million operational funding top-up for new construction

RECOMMENDATION 4

That the federal government's implementation of the Women's Program funding in Budget 2023 (\$160 million over three years starting in 2023-24) dedicate a significant portion of these funds to three-year operational funding of national feminist organizations advancing systemic change.

RECOMMENDATION 5

Women's Shelters Canada encourages the federal government to engage in an exploratory discussion about creating an external long-term sustainability fund for women's and gender justice organizations in Canada, convened by a national, domestically focused organization or organizations.

ABOUT WOMEN'S SHELTERS CANADA

Women's Shelters Canada brings together 16 provincial and territorial shelter organizations and supports the over 550 shelters across the country for women and children fleeing violence. We increase awareness to ensure that policies, legislation and regulations are informed by the experiences and insights of our members.

We connect knowledgeable and dedicated individuals from coast to coast to coast, so that new ideas are born, best practices are promoted and transferred and those who work in our challenging field feel more connected and supported. All of this helps to ensure that the women and children who turn to shelters and transition houses receive the most effective and compassionate support possible.

JUSTIFICATION OF RECOMMENDATIONS

RECOMMENDATION 1

The amount provided in Budget 2022 (\$539 million) for the National Action Plan (NAP) on GBV was earmarked for the provinces and territories. A National Plan must go beyond bilateral agreements between the federal government and provincial and territorial governments. The *raison d'être* of a National Plan is that the levels of services and protection provided to women and children fleeing violence should not depend on their postal codes.

The federal government has a responsibility to ensure that the Plan provides a coordinated, integrated system of anti-violence programs and support services that are adequately funded and offered across all geographic locations, and accessible to all women and gender-diverse people who have experienced any form of gender-based violence in Canada.

The following, based on the recommendations in [WSC's report](#) to guide the implementation of a NAP on VAW and GBV, are but a few specific examples of what is required at the national / federal level:

- Need for all levels of government to work together to ensure that all family laws— federal, provincial & territorial—align with one another in responding to family violence, in particular:
 - in the context of post-separation parenting arrangements to ensure that family violence is prioritized in weighing the best interests of the child criteria;
 - in the recognition and enforcement of restraining/protection orders, including between jurisdictions; and
 - in ending distinctions in some jurisdictions in the manner in which property division and exclusive possession of the family's home are dealt with for people in married vs common-law relationships.
- Need for the federal government to take immediate steps to eliminate systemic biases in Correctional Service Canada's (CSC) risk assessment tools that disproportionately impact racialized, Black, and Indigenous women.

- Need for all levels of government to coordinate and commit to ensuring that survivors and targets of VAW/GBV have adequate access to effective legal representation and supports. Specifically, the federal government needs to provide adequate, stable, long-term funding for legal aid services, inclusive of the wide variety of civil, family, criminal, immigration, refugee, and administrative proceedings with which a survivor of VAW/GBV may engage.
- Immediate measures need to be taken to ensure that all immigrant women, regardless of their status, race, gender identity, and sexual orientation are supported by our immigration system by creating permanent immigration pathways that would protect them from precarious working and living conditions, exploitation, and abuse. These measures must include:
 - providing clear and timely pathways to permanent residency for temporary residents, migrant workers, live-in caregivers, and nonstatus women in Canada;
 - elimination of immigration detention including the detention of children and women and implement alternatives to detention;
 - ending the practice of deportation based on criminality to eliminate any differential treatment based on hierarchy status; and
 - immediate decriminalization and removal of expectation of cooperating with the criminal justice system for survivors of trafficking, forced marriages, migrant workers, and labour exploitation.

RECOMMENDATIONS 2

In order for the National Action Plan to meet its objectives, it also requires an independent advisory council to provide oversight and ensure accountability is required. This body needs to be comprised of GBV experts who have deep knowledge of the issues and what needs to be addressed to bring about the long term change required. This working body needs to be taken seriously and its members need to be compensated for their time.

RECOMMENDATIONS 3

Need for renewal of the [Women And Children's Shelter And Transitional Housing Initiative](#)

This initiative, which falls under the National Housing Strategy's (NHS) Co-Investment Fund, supports:

- new build construction of shelter and transitional housing
- repair and revitalization of existing buildings
- top-up for operating costs of newly constructed transitional housing and shelter spaces for women and children fleeing violence

Canada needs to increase the number of shelters and transitional housing for women and children fleeing violence across the country. Far too many women and children are turned away from shelters every day for lack of space. According to the most recent data from [Statistics Canada](#), 669 women were turned away in one single day.

Shelters recognize the need to expand their services and continue to innovate to best respond to the gender based violence epidemic. It is for this reason that they have recently invested significant amounts of both human and financial resources to submit applications to CMHC through the Women and Children Shelter and Transitional Housing Initiative (WCSTHI) in 2022 and the third round of the Rapid Housing Initiative (RHI) in 2023. The WCSTHI was so crucial that it was four times oversubscribed. The third round of RHI was five times oversubscribed.

More than \$1 billion was requested over the two rounds of the WCSTHI by shelters that offer safe and affordable shelter space to women and children fleeing violence. Many projects that were shovel-ready, supported by other levels of government, and financially feasible were not funded simply because there was not enough money in the initiative.

The National Housing Strategy programs have received thousands of applications. While it is context dependent, many organizations are spending a minimum of \$400,000 to \$1,000,000 + to prepare competitive applications. A significant number of proposed projects meet all the necessary criteria but are still not being funded for lack of funds in the programs. The result is a huge financial drain on the shelter sector, which has been underfunded for decades.

It is widely known that the COVID pandemic has been accompanied by higher rates of violence against women. For the women and children living with violence, the anguish is indescribable. As reported by the Canadian Observatory on Femicide, on average one woman is killed every five days by a current or previous intimate partner.

The housing crisis in Canada is only compounding this problem. Without affordable spaces for women to move to after their time spent in violence against women (VAW) shelters / transitional housing, a bottleneck is created and fewer women and children fleeing violence are able to access these much needed resources.

Shelters play a key role in the continuum of services desperately needed for women and children fleeing violence and rebuilding their lives. Shelters contribute much more than a safe place to stay. They provide vital services and resources that enable women and their children who have experienced abuse, to recover from the violence, re-build self-esteem, and take steps to regain a self-determined and independent life. Shelters also contribute to awareness-raising and social change as part of broader efforts to prevent and eliminate violence against women and girls. Second Stage shelters are a form of transitional housing specifically designed to meet the needs of women and children fleeing violence.

For these reasons, we strongly recommend that the [Women and Children's Shelter and Transitional Housing Initiative](#), be an integral part of the Housing Strategy and that funding in the order of \$325 million be allocated in the 2024 budget towards the initiative.

RECOMMENDATIONS 4

In Budget 2023, funding was provided to the Women's Program in the amount of \$160 million over three years, starting in 2023–24. WSC was among the organizations that welcomed this funding, intended for organizations in Canada that serve women and equality-seeking groups, with a particular focus on

Indigenous women; women with disabilities; members of the 2SLGBTQI+ communities; and newcomer, Black, racialized, and migrant women.

The appropriate distribution of Women's Program funding is critical to ensuring that it serves its intended goals. It is important for decision-makers across government departments to understand that national organizations representing women and equality-seeking groups are typically ineligible for provincial/territorial government funding or municipal, local or community foundations support. Our natural partner to achieve systemic change is the federal government.

We appreciate the project funding that the Women's Program has made available since the 2015 federal election. It has given many groups important support to undertake specific activities and initiatives designed to advance women's rights in Canada. Project funding is important to our sector and the federal government must continue to provide it. However, project funding alone was not sufficient before the COVID-19 pandemic, and it certainly will not be enough in the face of societal disruptions, financial instability, and a growing and well-funded misogynist backlash against equality, diversity and progressive social change.

Project funding does not cover basic operating costs. By contrast, operational funding covers basic operating costs, such as salaries, facilities, communications, and expenses for day-to-day systemic change work. Operational funding provides invaluable stability to organizations like WSC, allowing us to uphold important standards of governance, financial management, and employment, while also permitting both proactive work and responsiveness to unexpected emerging issues.

\$160 million over three years for the Women's Program to provide funding to organizations in Canada that serve women was a funding commitment in Budget 2023. What is important today is to ensure that, as the Women's Program seeks to modernize its funding model, it carves out a portion of the allocated \$160 million for core operations of national women's organizations that are working to advance systemic change.