



**WRITTEN SUBMISSION FOR THE PRE-BUDGET CONSULTATIONS IN ADVANCE OF THE  
UPCOMING 2023 FEDERAL BUDGET  
October 7, 2022**

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

**RECOMMENDATIONS 1:**

That there be a further investment, of a minimum of \$600 million, over the next four years, in Canada's National Action Plan to end Gender-Based Violence for the development and implementation of the national and federal components of the Plan.

**RECOMMENDATIONS 2:**

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 which is currently set to end in 2027.

In Budget 2023, 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

**RECOMMENDATIONS 3:**

That the government commit \$25 million per year over five years for renewed multi-year capacity-building grant funding for women's and gender equity organizations.

**RECOMMENDATIONS 4:**

That the government ensure funding transparency in the funds provided to provinces and territories via the National Action Plan on Gender-Based violence and the National Housing Strategy.

**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**

### **RECOMMENDATIONS 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 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.

In order for the 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.

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**

**Need for continuance of the [Women And Children's Shelter And Transitional Housing Initiative](#), initiative**

This initiative, which falls under the National Housing Strategy's Co-Investment Fund, support's:

- 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 transition homes 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.

It is a 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 day and half in Canada.

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.

In addition to building additional shelter spaces, we also need to tend to the aging stock currently in place. In a Women's Shelters Canada study published in 2019, we reported that the average (mean) age of shelter facilities was 45 years old (built in 1973-1974), demonstrating that a number of shelters are aging. The vast majority (80%) of VAW shelters and transition homes are in need of some form of repairs and renovations.

This is why 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 2023 budget.

### **RECOMMENDATIONS 3:**

Renewed capacity building funding will help provide women's and gender equity organizations with the support we need not only to get back on our feet, but to eventually thrive in our collective efforts to achieve gender equality. Without this funding, organizational and sector health will see a significant decline, forcing organizations to allocate scarce resources away from program delivery, lay off staff, and in some cases, close our doors. Our ability to be nimble and respond to new and emerging threats, and to government requests for consultation, will also be greatly limited, as our organizations will not have sufficient capacity.

Renewing capacity building funding would help fulfill the objective set out in the mandate letter for the Minister for Women and Gender Equality and Youth “to sustain historic Government funding commitments to Canadian women’s organizations and equality-seeking groups, with a particular focus on Indigenous women, women with disabilities, members of the LGBTQ2 communities and newcomer, racialized and migrant women.” Making these funding commitments is also key to giving our organizations the capacity to help the Minister deliver on the further objective to “collaborate with women’s movements, organizations, experts and advocates on matters of public policy relating to women and gender equality.”

#### **RECOMMENDATIONS 4:**

It is essential that there be greater transparency in how the federal government track the funds it provides to the provinces and territory. We are especially preoccupied by the funds linked to the National Action Plan on GBV and the National Housing Strategy.

NAP agreements between the federal government and the provinces and territories need to be made public as does the detailed data on how funds are being allocated within the National Housing Strategy.

We expect the same accountability from the federal government as they do from us.