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The Lack of Accessible Housing in Canada

SUBMISSION TO THE NATIONAL HOUSING COUNCIL

Submitted by Women's Shelters Canada

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National Housing Council Canada
Review Panel on the Lack of Accessible Housing in Canada

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Introduction

Women's Shelters Canada is pleased to respond to the call for submissions from the National Housing Council on the lack of accessible housing in Canada. This is an important topic that will not only help address inequity in housing access across the country but will also advance the right to affordable and adequate housing that meets the needs of the many women and children living with disabilities who are fleeing violence.

Background

Women's Shelters Canada (WSC) serves as a unified, pan-Canadian advocate against gender-based violence (GBV). It represents 16 provincial/territorial shelter organizations, supporting more than 600 shelters nationwide that aid women, children, and gender-diverse people escaping abuse. WSC raises awareness to shape policies, laws, and regulations, drawing on members' frontline experiences and expertise. By linking dedicated professionals coast to coast to coast, WSC sparks innovative ideas, spreads best practices, and fosters connection and support in this demanding field. Ultimately, these efforts ensure women and children in shelters and transition homes receive optimal, compassionate care.

In Canada, 30% of women live with a disability. Women with disabilities are two times more likely to experience GBV than those without disabilities in Canada.¹ In addition, GBV can contribute to disabilities, including traumatic brain injuries, physical disabilities, and mental health concerns. Not only can disabilities limit a survivor's ability to leave violence, but violence against women (VAW) shelters, transition houses, and affordable housing options are not all accessible to those living with a disability.

In larger urban centres, there are often more options for housing and programming targeted to survivors who are women living with a disability, while also taking into account the important intersections with immigrant, refugee, and racialized survivors. There are regional differences, but the services that are provided are broadly similar. However, a lack of specific attention towards certain populations, including Black survivors, unaccompanied youth, and those living with a disability, presents additional barriers that are intertwined in a way that more seriously affect a woman's capacity to reach safe housing.

¹ Goulden et al. (2023). *Experiences of Gender-Based Violence Among Disabled Women: A Qualitative Systematic Review and Meta-Synthesis*.
https://drive.google.com/file/d/1UPJsdNJYOMWnAcyI2A_RjFwOrUr_OEX/view?pli=1

WSC recently found that only a minority of shelters are fully accessible to people with disabilities.² For those with disabilities who can access a VAW shelter, they often find few affordable housing options once they reach the shelter's maximum length of stay, leaving women and children with nowhere to go after a short-term stay. At WSC, we have heard from our member shelters and transitional houses that these circumstances lead to women staying longer in emergency spaces, returning to an abusive situation, or becoming homeless. Canada's housing crisis disproportionately affects women and children fleeing violence and infringes upon the right to adequate housing under international human rights law.³ This is even more pressing for those living with a disability.

WSC implores the National Housing Council to consider the arguments and evidence presented in this submission and to take appropriate action to protect and promote the right to adequate housing for all survivors fleeing violence, but with special consideration for the needs and experiences of survivors with disabilities.

Issue

Nationally, the affordable housing stock is aging. In 2025, CMHC found that about 50% of social and affordable housing units were built before 1980, and only 15% were built after 1995. WSC similarly found, in 2026, that the average year VAW shelters were built was 1981. Older buildings are much less likely to have accessibility features, and shelters have reported narrow doorways, stair-reliant layouts, inaccessible bathrooms, and a lack of automatic doors or emergency call systems. WSC's report finds that only 48% of shelters are generally accessible for survivors using a wheelchair or mobility device, and accessibility is markedly lower for some other disability communities.⁴

Gaps in programming within housing programs that are supportive, transitional, and permanent, specifically for some disability communities, are concerning. They need to be addressed to allow more sustained, equitable access to appropriate housing options. Resources are needed to match needs in every region.

The result is that many survivors with disabilities face a double barrier. They cannot always enter shelter safely, and they cannot reliably move from shelter into housing that is affordable, accessible, and appropriate. That means longer shelter stays, higher turn-away rates, greater risk of homelessness, and, in some cases, a return to an abusive partner because there is no realistic alternative.

Infrastructure Gaps

The most urgent consideration in addressing this issue is the capital investment gap. WSC's report shows that shelters are aging and under-resourced, and that the burden is heaviest in rural, remote, northern,

² Hoogendam, R. and Maduakolam, C. (2026). *Sheltering Under Pressure: Frontline Realities of Canada's Violence Against Women Shelters and Transition Houses*. Ottawa, ON: Women's Shelters Canada. <https://endvaw.ca/wp-content/uploads/2026/04/WSC-ShelteringUnderPressure-April2026.pdf>.

³ UN General Assembly. (1966). *International Covenant on Economic, Social and Cultural Rights*. Ontario Human Rights Commission. <https://www.ohchr.org/sites/default/files/cescr.pdf>

⁴ Hoogendam and Maduakolam, 2026.

and Indigenous communities.⁵ Those shelters are overrepresented among buildings in need of repairs, yet many lack the funds to carry out the work.⁶

That matters because accessibility is highly dependent on infrastructure. A shelter with stairs, narrow hallways, inaccessible bathrooms, or no emergency call systems will face significant challenges in achieving true inclusion through programming alone. Beyond a building's structure, purpose-built facilities are more likely to meet accessibility standards. In contrast, retrofitting older buildings is often costly and delayed, as organizations prioritize basic maintenance over accessibility upgrades.

The same logic applies to the broader housing sector. If social housing stock is aging and non-market providers cannot access adequate capital, then accessible housing will remain scarce even where policy language is strong.⁷ If for-profit development is not balanced by accessible and affordable supply, the market will continue to produce units that are technically new but practically unusable for many disabled tenants.⁸

Rural and Northern Needs

The impact is sharper in rural and northern communities, where the cost of construction is higher and the pool of trades, materials, and service providers is smaller. WSC's report notes that rural shelters account for only a small share of respondents, but rural, remote, northern, and Indigenous-run shelters are disproportionately represented among those needing repairs and renovations.⁹

In these settings, even a modest infrastructure issue can become a major access barrier. A shelter without accessible entries, working lifts, or adaptable bathrooms may be the only option in a wide geographic area, which means the absence of accessibility is not theoretical; it can determine whether a survivor has any safe place at all. A shelter respondent captured this reality stating that their shelter was not accessible and they had been advocating for a new, accessible space for years.¹⁰

That kind of example shows why capital funding must be responsive to geography. A national housing strategy cannot assume that the same solution works everywhere. Rural and northern communities need durable funding for repairs, retrofits, and new builds, not short-term projects that leave the underlying problem untouched.

⁵ Ibid.

⁶ Ibid.

⁷ National Housing Council (2024). "Scaling-Up the Non-Market Housing Sector in Canada." <https://nhc-cn1.ca/publications/post/scaling-up-the-non-market-housing-sector->

⁸ Ontario Human Rights Commission. (2020). "OHRC statement for National Housing Day November 22: Accessible housing makes social, economic sense." <https://www.ohrc.on.ca/en/news-center/ohrc-statement-national-housing-day-november-22-accessible-housing-makes-social>.

⁹ Hoogendam and Maduakolam, 2026.

¹⁰ Ibid.

Human Rights and Dignity

The lack of accessible housing is a human rights issue because housing is not adequate if it cannot be used safely and independently by people with disabilities.¹¹ For survivors fleeing violence, that means more than having a roof overhead. It means being able to enter the building, use the bathroom, move freely, communicate with staff, and remain in the space without compromising health or dignity.

WSC's report shows that shelters are increasingly asked to serve people with complex needs, but chronic underfunding and infrastructure limits make it difficult to do so consistently.¹² That is especially serious for survivors with disabilities, because inaccessible housing can trap them in unsafe circumstances or force them into situations that recreate dependence and exclusion.

Put simply, inaccessible housing denies autonomy. It turns the right to housing into a conditional benefit available only to people whose bodies, communication needs, and daily routines happen to fit the existing built environment. That is not consistent with dignity, equality, or the right to housing in practice.

Recommendation

WSC recommends the following actions:

1. Invest in accessible, purpose-built housing and retrofits at scale, with accessibility treated as core infrastructure rather than an optional add-on. This should include funding for universal design, elevators, ramps, accessible bathrooms, visual and audible safety systems, and accessible communication features.
2. Create dedicated capital funding streams for the acquisition, preservation, and renovation of existing affordable housing by non-profits, charities, and Indigenous-led organizations so that accessible units are preserved instead of lost to the market.
3. Prioritize accessible housing pathways for survivors of violence and people with disabilities through rent subsidies, portable housing benefits, and guaranteed access to accessible units in non-market and supportive housing.
4. Require all federal housing investments and agreements to include accessibility standards, with clear accountability for design, inspection, and compliance across provinces, territories, municipalities, and federally-funded providers.

¹¹ Ontario Human Rights Commission. (2016). *Discrimination based on disability and the duty to accommodate: Information for housing providers*. <https://www.ohrc.on.ca/en/discrimination-based-disability-and-duty-accommodate-information-housing-providers>; UN Committee on Economic, Social and Cultural Rights. (1991). *General comment No. 4: The right to adequate housing (Art. 11 (1) of the Covenant)* (E/1992/23), UN Doc. E/1992/23. <https://www.globalhealthrights.org/wp-content/uploads/2013/10/CESCR-General-Comment-No.-4-The-Right-to-Adequate-Housing1.pdf>; UN General Assembly. (2006). *Convention on the Rights of Persons with Disabilities*. <https://www.un.org/disabilities/documents/convention/convoptprot-e.pdf>.

¹² Hoogendam and Maduakolam, 2026.

5. Provide dedicated, multi-year funding streams for culturally specific programming and supports for disability communities, including accessible information and communication tools, to address the uneven availability of targeted housing options.
6. Close jurisdictional gaps affecting Indigenous housing and shelter infrastructure, including stable capital funding for Indigenous-led shelters and housing providers on- and off-reserve.
7. Expand non-market housing supply and supportive housing options, especially second stage and longer-term housing for survivors who cannot safely move directly from shelter into the private market.
8. Improve data collection on accessible housing supply, unmet demand, and unit quality so governments can track whether accessible housing is actually being created, preserved, and allocated to those who need it.

Conclusion

The lack of accessible housing in Canada is not only a housing shortage; it is a systems failure that affects human rights, safety, and dignity. WSC's report shows that the shelter system and the housing system are facing the same underlying problem: aging infrastructure, inadequate capital, and too little accessible supply where it is needed most.

Canada will not make meaningful progress on the right to housing unless accessible housing is built, preserved, and funded as core infrastructure. For survivors fleeing violence, that progress must include both non-profit and market solutions, but with strong public investment and accountability so that accessibility is real, affordable, and available in every region.

Thank you for this opportunity.



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