

## **YWCA Canada Feedback on Build Canada Homes Market Sounding Guide**

### **Executive Summary**

YWCA Canada welcomes the federal government's commitment to establishing Build Canada Homes (BCH) as outlined in the Market Sounding Guide. As Canada's largest and oldest women's multi-service organization, with housing and shelter programs operating across the country, YWCA Canada brings critical expertise to this consultation process. We urge the federal government to ensure that BCH meaningfully advances gender equality by embedding women's housing needs into the program design from the outset, consistent with the National Housing Strategy's minimum standard of directing at least 25% of funds towards women and children.

#### 1. Introduction & Context

YWCA Canada is the country's largest and oldest women's multi-service organization. Across our national membership, YWCAs provide housing, shelter, employment, and support programs in communities ranging from Canada's largest urban centres to small, rural, remote, and Northern communities. For more than 150 years, YWCAs have delivered community-driven housing solutions for women, children, and gender-diverse people.

The Build Canada Homes initiative represents a major opportunity to address the persistent and gendered housing gap in Canada. Women, children, and gender-diverse people—particularly those fleeing violence and living in poverty—encounter systemic challenges that non-specialized housing solutions fail to address. These include the need for trauma-informed design, wraparound supports, proximity to specialized services, enhanced security features, and long-term affordability that accounts for the persistent gender wage gap.

YWCA Canada urges the Government of Canada to embed a minimum 25% funding carve-out for women and children, including those fleeing violence, consistent with the National Housing Strategy. This principle must be a cornerstone of Build Canada Homes if the program is to meaningfully advance gender equality and meet the needs of those most vulnerable to housing insecurity, while going further to ensure these funds reach organizations with proven expertise in women's housing.

#### 2. Dedicated Commitment of Funds

##### **Recommendation: Adopt a minimum 25% funding carve-out for women and children**

YWCA Canada strongly recommends that BCH adopt a minimum 25% funding carve-out, consistent with the National Housing Strategy, specifically directed to housing for women and children, including those fleeing violence. This commitment must be embedded in the program's foundational structure, not left as an aspirational goal.

Critically, these funds must go directly to women-led organizations that build and operate women's housing, and not merely to mixed housing projects that allocate a percentage of units to women. This distinction is essential because:

- Women-led organizations understand the complex interplay between housing and other forms of support needed by women and children.
- They provide trauma-informed, culturally responsive wraparound supports that address root causes of housing instability.
- Their housing designs prioritize safety, accessibility, and the specific needs of women and families.
- They maintain long-term commitment to serving women, even when market conditions change.
- They create environments where women can heal, build community, and achieve stability.

Non-specialized affordable housing developments, while valuable, cannot replicate the specialized knowledge, design considerations, and supportive environments that women-led organizations provide. The funding carve-out must recognize this expertise and direct resources accordingly.

### 3. Deep Affordability & Spectrum of Housing Needs

#### **Recommendation: Prioritize deeply affordable housing across the full spectrum**

Build Canada Homes must prioritize deeply affordable housing that women and their families can realistically access, given the persistent gender wage gap and the overrepresentation of women in precarious employment. The program must recognize that affordability for women often means housing costs well below market rates.

The program must fund the full housing spectrum for women, including:

- **Emergency and Transitional Housing:** First-response accommodation for women fleeing violence or experiencing crisis, with intensive wraparound supports and safety planning.
- **Second-Stage Housing:** Medium-term housing (typically 6-24 months) that allows women to stabilize, access counseling and legal services, and plan their next steps while maintaining safety from abusers.
- **Permanent Affordable Housing:** Long-term housing with rents geared to income, providing the stability necessary for women and children to rebuild their lives, pursue education or employment, and maintain community connections.

#### *Dedicated Funding Envelope for Crisis Response*

YWCA Canada urges BCH to create a dedicated envelope specifically for transitional housing and shelters, recognizing the acute shortage of these facilities and their critical role in preventing homelessness. While existing programs like the Women and Children Shelter and Transitional Housing Initiative have allocated \$420 million from 2020-2025 to support new shelters and transitional housing, demand continues to far exceed supply. Emergency housing serves as the foundation of the housing continuum, and without adequate capacity at this level, women and children remain trapped in dangerous situations or experience homelessness.

#### 4. Integration of Gender-Based Analysis Plus (GBA+) in Design & Implementation

##### **Recommendation: Embed comprehensive GBA+ analysis throughout the program**

Build Canada Homes must embed Gender-Based Analysis Plus (GBA+) into every aspect of program design and implementation, including:

- **Program Design:** All BCH instruments, funding mechanisms, and eligibility criteria must be developed through a GBA+ lens to identify and address potential barriers faced by women, children, and gender-diverse people.
- **Funding Criteria:** Application requirements, evaluation processes, and selection criteria must explicitly incorporate GBA+ considerations, ensuring that projects demonstrate understanding of and responsiveness to the specific needs of women, children, and gender diverse people.
- **Selection of Proponents:** The evaluation process must prioritize applicants who can demonstrate GBA+ competency and track records of serving women, children, and gender-diverse people effectively.
- **Evidence Requirements:** All project applications must include evidence of GBA+ analysis, including how the proposed housing will address gender-specific barriers, incorporate trauma-informed design, and connect residents to appropriate supports.
- **Monitoring and Evaluation:** BCH must collect and analyze GBA+ disaggregated data to track outcomes for different populations and ensure the program is achieving its equity objectives.

This comprehensive approach will ensure that gender considerations are not treated as an add-on but are fundamental to how BCH operates and measures success.

#### 5. Prioritization of Women-Serving Organizations

##### **Recommendation: Streamline access for proven women-serving organizations**

YWCA Canada recommends that BCH streamline access for organizations that have previously applied to oversubscribed federal housing programs and were deemed viable but not funded due to capacity constraints. Many experienced women-serving organizations have invested significant resources in developing comprehensive proposals for programs like the Women and Children Shelter & Transitional Housing Initiative and the Rapid Housing Initiative, only to face rejection due to insufficient funding envelopes rather than project deficiencies.

BCH should establish priority funding channels for these proven applicants, recognizing their demonstrated capacity and readiness to proceed. This approach would:

- Accelerate project timelines by building on existing, vetted proposals
- Recognize the expertise and track record of established women-serving organizations
- Reduce administrative burden on both applicants and government
- Ensure that funding reaches organizations with proven ability to serve women effectively

### *Portfolio Approach for National Scale*

The Market Sounding Guide notes that Build Canada Homes is envisioned as “growing the stock of affordable housing ... through a small number of large deals, rather than a large number of small deals.” While this approach may increase efficiency, it risks leaving behind women’s organizations, many of which operate smaller-scale projects that are nonetheless vital for their communities. This is particularly the case for women’s housing organizations serving small, rural, remote and Northern communities.

If Build Canada Homes proceeds on this model, we urge the government to proactively work with national membership organizations such as YWCA Canada and Women’s Shelters Canada to develop a portfolio approach. Through this model, multiple women’s housing and shelter projects can be aggregated and advanced together, achieving scale. Without a portfolio approach, the large-deal model of Build Canada Homes will inadvertently sideline women-serving organizations and perpetuate the gender housing gap.

The portfolio approach would ensure:

- **Geographic Equity:** Individual women-serving organizations in small, rural, remote, and Northern communities lack the capacity to develop "large deals" that would qualify under BCH's anticipated structure
- **National Coordination:** Organizations like YWCA Canada, with members across the country, can coordinate multi-site developments that aggregate smaller community needs into the large-scale projects BCH envisions
- **Specialized Expertise:** National women's organizations possess the sector-specific knowledge to ensure consistent quality and appropriate design across diverse geographic contexts
- **Efficiency of Scale:** Portfolio approaches can achieve economies of scale in design, procurement, and project management while maintaining local responsiveness

Without this portfolio approach, women in small, rural, remote, and Northern communities will not be served by Build Canada Homes, as their local organizations cannot compete with large urban developers for the "small number of large deals" the program anticipates. This would perpetuate and worsen the geographic inequities that already leave rural and remote women with fewer housing options and longer distances to specialized services.

The government must proactively structure BCH to enable national membership organizations to aggregate community needs across multiple sites, creating large-scale investments that serve women's housing needs in communities that would otherwise be excluded from the program.

### *Accessible Application Processes*

Beyond the portfolio approach, the application process must be simplified and accessible to non-profit women's organizations that may have limited administrative capacity compared to large development companies. This includes providing application support, allowing for phased

submissions, and recognizing that the most effective women's housing providers may not be the organizations with the most sophisticated proposal-writing capabilities.

#### 6. Funding Flexibility & Sustainability

#### **Recommendation: Ensure flexible, long-term, and comprehensive funding**

BCH funding must be designed with the operational realities of women's housing in mind:

- **Stackable Funding: BCH** resources must be easily stackable with other federal, provincial, and municipal funding sources. Women's housing projects often require diverse funding streams to achieve viability, and BCH should complement rather than complicate these arrangements.
- **Long-term Sustainability:** Funding must be long-term and sustainable, including operational and maintenance funding, not just capital construction costs. Women's housing requires ongoing support for wraparound services, specialized programming, and enhanced security measures that generate operational costs beyond typical housing.
- **Operational Support:** BCH must recognize that effective women's housing includes costs for trauma counseling, childcare, life skills programming, and other supports that enable women to achieve housing stability. Funding models that only cover bricks and mortar fail to address the full scope of need.
- **Avoiding Short-term Approaches:** The program must avoid short-term project-based approaches that leave women's housing insecure after initial funding expires. Women experiencing violence and those with children need assurance of long-term housing security to make the difficult decision to leave dangerous situations.

#### *Upfront Investment Challenges*

Local YWCAs have consistently experienced challenges accessing the initial investment required to get housing projects off the ground. Construction projects demand significant upfront funds to proceed, and it is not feasible for non-profit organizations to begin building while waiting for federal funds to flow months or years later. With limited assets and a necessarily risk-averse approach, non-profits simply cannot shoulder this financial burden.

#### *Federal Leadership and Intergovernmental Coordination*

This challenge is particularly acute when federal funding requirements stipulate that other levels of government must also commit resources. While it is reasonable to expect federal, provincial or territorial, and municipal governments to share responsibility, placing the onus on non-profit organizations to broker these multi-level commitments is inefficient and unrealistic. Too often, one order of government will delay action until it sees movement from another, creating stalemates that prevent urgently needed housing projects from advancing.



The expertise of women-led non-profits lies in serving communities, not in navigating intergovernmental negotiations. Federal leadership is essential to set the terms of partnership with other governments, to ensure that housing dollars flow quickly and that non-profits are not left in a holding pattern.

By addressing these upfront investment barriers and strengthening federal leadership, Build Canada Homes can ensure that women-serving organizations are empowered to deliver housing, rather than left struggling to overcome systemic funding gaps.

#### *Operational Support*

While capital investment is critical, operational funding is equally important to ensure new housing projects succeed. Even minimal operational support provided at project launch can make a significant difference, as demonstrated by the Women and Children Shelter and Transitional Housing Initiative. YWCA Canada recognizes that much of this support may ultimately come from provincial or territorial governments. However, the federal government can play a catalytic role by ensuring operational dollars are part of the funding model from the outset, helping new projects establish themselves on a stable footing.

By addressing these upfront investment barriers, embedding operational support, and strengthening federal leadership, Build Canada Homes can ensure that women-serving organizations are empowered to deliver housing, rather than left struggling to overcome systemic funding gaps.

### 7. Neighbourhood & Building Standards

#### **Recommendation: Implement comprehensive location and design standards**

Housing is linked to dignity, stability, and holistic support, and our supportive housing programs are designed to offer more than basic shelter or rental assistance. For housing to be truly supportive, attention must be paid to both neighbourhood and building-level features. YWCA Canada member association YWCA Halifax conducted a research project, [\*Home For Good: Advancing Women's Housing Through Systems Change\*](#), in partnership with researcher Dr. Diane Crocker, Professor of Criminology, St. Mary's University. This research revealed that building homes for women, children, and gender diverse people requires careful consideration in neighborhood features and building features

**Neighbourhood Features:** BCH-funded housing must ensure safety, accessibility, and long-term viability through careful attention to neighbourhood characteristics:

- **Safe Communities:** Locations with good lighting, active foot traffic, and proximity to community supports
- **Service Proximity:** Access to groceries, healthcare, transit, employment opportunities, schools, and childcare
- **Safety from Abusers:** When serving women fleeing intimate partner violence, strategic location considerations that maximize distance from potential perpetrators while maintaining access to legal, social, and health services

- **Community Integration:** Neighborhoods that welcome diverse families without stigmatization

**Building Features:** The physical design of BCH-funded women's housing must reflect the specific needs of women and families:

- **Deep Affordability:** Below-market rents that account for women's lower average incomes and precarious employment
- **Accessibility and Maintenance:** Universal design principles and high-quality construction that ensures long-term habitability
- **Practical Amenities:** On-site laundry, utilities included in rent, and secure, trustworthy landlord relationships that provide stability
- **Security Features:** Secure entry systems, adequate parking, and design elements that maximize safety without creating institutional environments
- **Family Accommodation:** Multiple bedrooms, pet-friendly policies recognizing the importance of companion animals, and full wheelchair accessibility
- **Trauma-Informed Design:** Spaces that promote healing and community-building while providing privacy and autonomy

#### 8. Integrating Childcare With Housing Expansion

##### **Recommendation: Coordinate housing and childcare infrastructure investments**

Safe, affordable housing and accessible, affordable childcare are inseparable for women, children, and gender-diverse people. Without childcare, stable housing alone does not resolve the systemic barriers that women—particularly mothers—face in achieving safety, stability, and economic security. For women fleeing violence, single mothers transitioning from homelessness, or families struggling with housing affordability, the absence of reliable childcare can trap them in cycles of instability regardless of their housing situation.

Build Canada Homes should be designed in strategic partnership with Canada's national affordable childcare plan to ensure that housing expansion is coordinated with childcare access. This integration is especially critical for women who are rebuilding their lives after violence, poverty, or housing instability, as they require both safe housing and reliable childcare to pursue employment, education, or healing.

##### *Strategic Integration Approach*

- **Co-located Development:** Childcare facilities should be built alongside new housing developments funded by Build Canada Homes, particularly those serving families and women-led households. Co-location provides multiple benefits including enhanced safety through increased community presence, reduced transportation barriers, and opportunities for peer support among parents.
- **Proximity Prioritization:** BCH should give priority to developments located close to existing affordable childcare centers, schools, and family support services. When housing and

childcare are geographically accessible to each other, families can more easily maintain stability and access multiple supports.

- **Formal Program Linkages:** Federal programs should establish formal coordination mechanisms between housing and childcare infrastructure planning, ensuring that investments are mutually reinforcing rather than developed in isolation. This requires inter-departmental collaboration between housing and social development portfolios.
- **Accessible Funding Structure:** Funding for childcare infrastructure integrated with BCH housing developments must be delivered as **non-repayable capital grants**, not repayable financing or loans. Women-serving and non-profit organizations typically lack the revenue streams to service debt for childcare facilities, which operate on thin margins and serve vulnerable populations who cannot afford market-rate fees.

### *Implementation Framework*

This integration should include dedicated funding envelopes within BCH for childcare infrastructure, streamlined application processes that allow housing and childcare components to be evaluated together, and long-term operational funding commitments that ensure childcare centers remain affordable and sustainable.

By integrating childcare into the design and location of new housing developments, and ensuring this funding is accessible through non-repayable grants, Build Canada Homes will provide women and their families with the comprehensive support system necessary not just to achieve housing stability, but to build pathways toward long-term economic security and independence.

## **9. Conclusion**

Build Canada Homes represents a historic opportunity to meaningfully advance gender equality through federal housing investment. By ensuring a dedicated 25% carve-out for women and children, prioritizing funding for women-led organizations, supporting wraparound services, and implementing comprehensive GBA+ analysis, the program can create transformative change in housing security for women, children, and gender-diverse people across Canada.

The recommendations outlined in this submission are grounded in YWCA Canada's extensive experience providing housing and shelter services to women and families. They reflect the real-world needs of women fleeing violence, single mothers struggling with housing affordability, and gender-diverse individuals facing discrimination in housing markets.

BCH's success will be measured not only by the number of units created but by its ability to address the specific and intersectional challenges faced by marginalized populations. Women, children, and gender-diverse people cannot afford for this program to replicate the gender-blind approaches that have left them underserved by previous housing initiatives.

We urge the federal government to embed these gender equity commitments into BCH's foundational structure, ensuring that this significant public investment creates lasting change in housing security for those who need it most. YWCA Canada stands ready to work with government



and other partners to implement these recommendations and create a housing system that truly serves all Canadians.

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