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# Breaking Barriers

## Centering the Voices of Women and Gender-Diverse People in Accessing the Affordable Housing System

Sze Ching (Michelle) Pang

Maya Bras

**Toronto Women in Action Project**



nellie's

SAFETY. STRENGTH. SUPPORT.

# Executive Summary

*Toronto's housing crisis is pushing women and gender-diverse people to the margins of a system not built for them. Grounded in Nellie's intersectional feminist and anti-racism/anti-oppression framework, this position paper centers lived experience alongside sector research to reveal how current policies and practices deny access to safe, affordable, and dignified housing.*



**Between May and August 2025, six trauma-informed focus groups were held with women and gender-diverse people with lived experience, along with frontline staff from Nellie's, the Native Women's Resource Centre of Toronto, and The 519. A housing lawyer at Don Valley Community Legal Services provided additional policy and legal perspectives.**

Findings show that survivors of gender-based violence face “paperwork over safety” barriers in the Special Priority Policy, where rigid documentation rules, inconsistent regional requirements, and short deadlines exclude many from housing access. Women with disabilities encounter inaccessible buildings, discriminatory service cultures,

and online systems incompatible with assistive technology, yet remain outside formal priority categories. Indigenous women are often excluded before applications begin due to missing identification, digital inequities, and culturally unsafe services, while gender-diverse people face misgendering, discrimination in shelters and rentals, and daily threats to safety and dignity.

Systemically, affordable housing supply remains constrained by high land and construction costs, lengthy approval processes, inadequate long-term funding, and a shortage of skilled labour—barriers that deter developers and limit the creation of deeply affordable homes.

This paper calls for coordinated reform: expanding and simplifying the Special Priority Policy; creating accessible and priority pathways for people with disabilities; strengthening Indigenous-led and culturally safe housing; ensuring gender-affirming, trauma-informed service delivery; and enabling development through prepared public land, long-term financing, bridge funding, and expedited approvals.

**Housing is recognized as a human right in Canada. Realizing it in Toronto requires bold, systemic change—centering the leadership and voices of those most impacted.**

# I. Introduction



**At Nellie's, we are committed to an intersectional feminist, anti-racism/anti-oppression framework. We recognize that access to safe and affordable housing is shaped by interlocking systems of oppression which marginalize those already pushed to the edges of society.**

**This position paper focuses on four equity-deserving groups:** women experiencing gender-based violence, women with disabilities, indigenous women and gender-diverse people.

Through focus groups and community engagement, we explore how systemic barriers—such as inaccessible housing programs, discriminatory practices, and inadequate support services—undermine their right to affordable housing.

By centering lived experiences while also incorporating research on structural barriers posed by land development practices, we aim to highlight the changes needed to ensure housing systems are truly inclusive, safe, and supportive for those most impacted by inequality. We understand housing not only as a basic human right, but as a foundation for safety, dignity, and recovery. Through this lens, we examine how current systems replicate structures of oppression and propose recommendations that challenge the status quo—grounded in the real experiences of the communities we serve.

# Housing in Toronto: Confronting a Deepening Crisis

**Average monthly rent for a one-bedroom apartment is \$1,715 a two-bedroom at \$1,985, and for a three-bedroom at \$2,268**



Toronto, a dynamic and diverse metropolis, is grappling with a housing affordability crisis of unprecedented scale, fundamentally reshaping its social fabric. The bedrock dream of a secure and adequate home has become an increasingly unattainable reality for countless individuals and families, pushing them to the brink. According to the City of Toronto's Average Market Rents & Utility Allowances, effective as of February 5, 2025, the average monthly rent for a one-bedroom apartment is \$1,715, for a two-bedroom at \$1,985, and for a three-bedroom at \$2,268.

Despite an average individual income of approximately \$57,549 per year (\$4,795/month before taxes) in Toronto (2024), City-reported rents mean a significant portion of income is spent on housing, often surpassing the widely accepted 30% affordability guideline. Consequently, even a basic one-bedroom apartment remains tragically out of reach for many, particularly those with lower wages or fixed incomes, forcing agonizing choices between shelter and other essential needs.

This dire situation is further compounded by the extreme scarcity of Rent-Geared-to-Income (RGI) housing, a vital safety net where rent is capped at 30% of a household's net monthly income. The waitlist for RGI housing in Toronto is notoriously long, stretching to an average of 15 years for a one-bedroom unit and 12 years for a two-bedroom, with other unit sizes facing similar delays (City of Toronto, 2025).

**With over 104,000 households actively awaiting an RGI unit as of Q1 2025, and only a trickle of units becoming available annually, the "line is not moving" for most. The theoretical pathway from emergency shelters to transitional housing and then to RGI units, once a beacon of stability, has effectively stalled, trapping many in a perpetual cycle of precarity.**

# Housing as a Fundamental Human Right

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**Recognized as a fundamental human right in Canada, housing is explicitly affirmed by the National Housing Strategy Act 2019.**

This landmark legislation commits the federal government to ensuring all individuals have access to housing that is secure, affordable, habitable, accessible, and culturally appropriate, free from discrimination. Yet, in Toronto, this fundamental right remains a distant dream for a significant portion of the population, especially its most marginalized communities.

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## The Disproportionate and Hidden Toll on Women and Gender-Diverse People

The deepening housing crisis casts a particularly devastating shadow over women and gender-diverse people, who are disproportionately represented among those experiencing homelessness and housing insecurity. Recent data paint a stark picture: the number of people experiencing homelessness in Toronto more than doubled between 2021 and 2024, reaching an estimated 15,400 individuals by October 2024 (Draaisma, 2025). Toronto's shelter system, a critical but overburdened resource, consistently operates at or near capacity, frequently turning away those desperately seeking refuge; as of November 2024, an average of 216 callers each day could not find shelter space (City of Toronto, 2025). Compounding this, 2023 saw a 6% decrease in beds specifically for women within emergency shelters across Canada (Housing, Infrastructure and Communities Canada, 2025).

Within this grim reality, women comprise a significant portion,

with **approximately 41% of those officially experiencing homelessness in the city identifying as women** as of September 2024 (City of Toronto, 2025). However, these figures gravely undercount the true scale of women's homelessness due to the pervasive issue of hidden homelessness. Women are often compelled to "couch-surf," endure precarious or unsafe living situations with acquaintances, or remain trapped in abusive relationships rather than face the dangers of street homelessness or the uncertainties of shelter systems, rendering them invisible in official counts. Even more tragically, Toronto Public Health reported in early 2025 that the median age of death among unhoused women has plummeted to a horrifyingly young 36 years (City of Toronto, 2025), largely due to toxic drug poisoning.

Gender-diverse individuals in Toronto face unique and amplified vulnerabilities regarding homelessness.

**A significant struggle is evident:** a staggering 69% have struggled with housing affordability, and 26% have lost housing due to discrimination or harassment based on their gender (WNHHN, n.d.). While data collection is challenging, estimates show 10-12% of Toronto's homeless identify as 2SLGBTQ+, rising to 23% among unhoused youth (ages 16-24) (Stouffer-Lerch, 2025), significantly higher than their representation in the general adult population. These statistics highlight shattered lives and profound human suffering, consequences of systemic failures that push individuals into increasingly precarious and dangerous existences. This paper asserts that truly addressing Toronto's housing crisis necessitates a radical shift, one that centers the lived experiences and distinct needs of women and gender-diverse people, moving beyond a one-size-fits-all approach to forge a housing system that truly upholds the human right to adequate and affordable housing for all.

## II. Methodology

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*This position paper draws on both qualitative and secondary data sources to explore the barriers to affordable housing for equity-deserving groups, including women experiencing gender-based violence (GBV), women with disabilities, Indigenous women, and gender-diverse people.*

Between May and August 2025, we conducted a series of in-person focus groups with women and gender-diverse people who have lived experience of housing precarity, as well as staff who support them. These sessions were hosted at different community agencies, including Nellie's, the Native Women's Resource Centre of Toronto, and The 519, to ensure safe and affirming spaces for participants. In total, 18 participants and 5 staff engaged across 6 sessions. In addition, we gathered insights from a lawyer at Don Valley Community Legal Services to provide legal and policy perspectives.

The focus groups were guided by open-ended questions and facilitated using trauma-informed and culturally responsive approaches.



**Women and gender-diverse participants with lived experience shared their personal stories, systemic challenges, and recommendations for change, while staff contributed their perspectives as service providers.** All discussions were documented through detailed note-taking and analyzed thematically to identify key patterns and insights.

To complement these qualitative findings, we also reviewed existing literature, sector data, and research on systemic housing barriers—including those related to government policy, service delivery, and land development practices.

These broader insights were used to contextualize and deepen our understanding of the lived experiences participants shared.

All identities of women and gender-diverse participants with lived experience have been anonymized to protect privacy and confidentiality. Their participation was entirely voluntary, and individuals were informed of their rights and supports available throughout the process.

### III. Barriers to Affordable Housing for Women Experiencing Gender-Based Violence

**Women experiencing gender-based violence (GBV) face far more than physical harm from their abusers—they face systemic, bureaucratic, and social harms when trying to find a safe place to call home.**

GBV includes a range of abusive behaviours such as physical violence, emotional and psychological abuse, sexual violence, financial control, and manipulative tactics used by intimate partners or family members to maintain power over women and gender-diverse people.

Insights from Nellie’s Violent Against Women shelter focus group reveal how the GTA’s housing system continues to fail the very people it claims to protect.



*“I Just Want Somewhere Stable.”*

For these women, safe and stable housing means more than four walls. It means a space large enough to accommodate their children—children who need calm routines, not constant moves. One mother shared how it is difficult for all children to adapt each time they are forced to move between shelters, especially her own child who has autism and struggles deeply with these constant transitions. Another mother with three First Nations young children spoke about wanting a home that feels like a community, with nearby subway station, grocery stores, daycare, and support centres. As she said simply, “I just want somewhere stable. Somewhere my kids can feel safe.”

These aspirations reflect CMHC’s findings (2019) that women leaving violence prioritize safety, stability, and community connectivity as essential to recovery and family wellbeing.



*“It’s Frustrating. Awful. Unbelievable.”*

When asked how they felt about their current housing situation, participants’ responses were immediate: “Frustrating. Awful. Unbelievable. Worrying.” One woman described every day fearing she would be asked to leave the shelter before finding permanent housing. This fear is well-founded. Women’s Shelters Canada (2024) reports that the shortage of affordable housing forces survivors to remain in shelters far beyond intended stay lengths, delaying stability and placing them at risk of re-violence.

Even with Special Priority Policy (SPP) designation, survivors are facing wait times of more than a year to be placed in Rent-Geared-to-Income (RGI) housing. In the meantime, they are forced to move from shelter to shelter—or worse, when no beds are available, to sleep on a friend’s couch, in a car, or even return to an unsafe environment with their abuser. This form of hidden homelessness leaves women and children in precarious, unsafe, and deeply traumatic conditions.

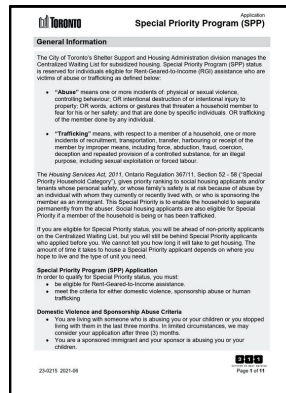
# The Impossible Paperwork: Special Priority Policy (SPP) Barriers

In Ontario, the Special Priority Policy (SPP) under the RGI housing program is designed to give survivors of domestic violence or human trafficking priority access to affordable housing. However, the process to qualify for SPP often creates new barriers for women escaping violence.

Focus group participants and frontline housing staff explained that SPP applications require survivors to provide proof of cohabitation with their abuser within the past three months—such as a joint lease or bills in both names. For many women who experienced economic abuse or informal living arrangements, these documents are impossible to obtain. As one participant said, “How am I supposed to get a lease with his name on it when he never let me be on the lease? He controlled everything.” The system’s rigid documentation requirements fail to account for the realities of abuse and control, ultimately excluding many survivors from the very protections meant to support them.

Rachel Seaward, Community Housing Manager at Nellie’s, highlighted that a major barrier is the lack of information shared with survivors about SPP. Many clients shared they wished they had been informed of the program when police first responded to an incident or immediately upon entering shelter.

Given that the three-month eligibility period starts the day a person flees abuse, many survivors miss the window simply because they were unaware the program existed. Often, they only learn about SPP once they feel safe enough to research or connect with others—at which point it is too late to meet eligibility requirements.



Moreover, she shared that requirements differ by region, creating further confusion and inequities. For example, Toronto, Niagara, and Peel regions each accept different forms of documentation: while some regions may accept a driver’s license as proof of cohabitation, others will not. In Toronto, if applications are rejected, women are often not told which specific documents are missing or what additional proof is needed, leaving them without a clear pathway to appeal or reapply. This lack of transparency adds further barriers for survivors already navigating trauma and crisis, effectively punishing them for the dynamics of abuse that trapped them in the first place.

**Michelle Choe, a housing lawyer at Don Valley Community Legal Services, outlined the process survivors must navigate:**

## 1) Preliminary Review

The City reviews the application and supporting documents and issues a Decision Letter, either approving or denying the application.

## 2) Final Request to Review / Service Manager Appeal

Applicants may appeal based only on legal or procedural errors—not new documents. If new documents are submitted, the City is not obligated to consider them.

Applicants must look carefully at the decision letter they receive, as sometimes it is not final. If the decision is not final, they may be permitted to submit additional supporting documentation. However, a review does not allow for new documents to be added once the decision is final. In practice, the resubmission window is often only 30 days, which is rarely enough time for survivors who are coping with trauma, adjusting to shelter life, and supporting their children to gather the necessary paperwork.

Because of this, applicants are strongly advised to “front-load” their initial applications by including more supporting documentation than they think they may need. Missing documents or incomplete files can lead to denials that cannot later be corrected.

## The Impossible Paperwork: Special Priority Policy (SPP) Barriers Continued...

Further complicating the process, the Decision Letter often fails to clearly outline what documents are missing or needed, leaving women and their case workers without proper direction. As a result, many survivors feel pressured to return to their abuser’s home to retrieve paperwork, putting themselves at risk of further harm. In the chaos of fleeing violence—especially with children—documentation is rarely top of mind. Yet the system continues to prioritize paperwork over safety, treating survivors’ administrative barriers as if they were personal failures.

Another recurring barrier identified by housing workers is the miscommunication and inconsistent handling of SPP applications by City staff. Rachel also noted that staff often claim key documents or information are missing from applications or advocacy letters, even when everything has already been submitted. In many cases, housing workers have had to resend the exact same application—this time with the so-called “missing” information highlighted in a cover letter—only for it to be accepted. While the application is eventually processed, this unnecessary step

causes delays, as the file is marked “under review” for an additional 30 days. These administrative loopholes create avoidable setbacks that prolong the housing crisis for survivors who are already in precarious and traumatic circumstances.

Rachel also recommends a centralized SPP application process across Ontario. Allowing applicants to apply to multiple regions from a single form would reduce administrative burdens, especially for women without stable access to internet or a phone. It would also ease pressure on overburdened housing workers managing multiple applications per client.

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## Moving While Healing: A Child’s Trauma



The focus group revealed that moving from shelter to shelter retraumatizes children, breaking the small sense of security they begin to rebuild after escaping violence. For mothers, this constant upheaval compounds guilt, fear, and exhaustion.

This reflects research from the American Psychological Association(2017), which found that children who experience multiple moves and prolonged housing instability suffer long-term impacts on development, education, and emotional regulation. Mothers in the group

spoke about how deeply their children are affected by every transition—especially children with complex needs. One woman shared that her autistic child cannot cope with new routines or loud environments, making every move an emotional setback.

Rachel further emphasizes the need for transitional housing for mothers over the age of 29. Many supports are only available to “young mothers,” leaving older women with children—who are increasingly common—with limited options and heightened risk of housing instability.

## When Help Fails

**Participants described service gaps that made an already traumatic journey even harder:**

- Shelter staff lacking knowledge of Indigenous child welfare systems, forcing First Nations mothers to navigate alone
- No immigration support for newcomer women, leaving legal status issues unresolved and deepening housing insecurity
- Lack of confidentiality—staff discussing private matters openly or posting resident photos without consent
- No consolidated, up-to-date resource lists to guide women through Ontario’s fragmented housing and social support systems

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## What Helps: Peer Support and Children’s Programs

Despite these gaps, women highlighted the power of peer support from other residents, describing how women in the shelter “look out for each other.” Children’s programs also provided moments of joy and learning, helping kids feel safe again—if only temporarily.

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## What They Need Right Now

**When asked what would help them feel more stable, women listed:**



- Onsite therapy or counselling sessions for emotional recovery, for both women and children
- Programs for children with special needs, eg. Autism, ADHD, Physical and Intellectual supporting services
- Legal aid consultations for status and custody issues
- A single, regularly updated list of housing and support programs
- More transitional and permanent housing for women and children that includes child-friendly amenities like safe outdoor play areas, gardens for self-grown crops, and kitchens with windows to monitor children nearby

# Recommendations

To address the systemic barriers identified by survivors and frontline staff, policymakers and housing authorities must:

## Special Priority Policy (SPP) Recommendations:

- **Extend both the initial SPP application window beyond three months and the resubmission window beyond 30 days**, allowing survivors adequate time to stabilize, care for their children, gather necessary documents, and receive support before and during the application process.
- **Clearly list which specific documents are missing** or required at each stage of review to ensure transparency and reduce confusion.
- **Improve early and consistent information sharing about SPP.** Survivors should be informed of their rights and available supports at key intervention points—such as police interactions, healthcare visits, and shelter intake—through standardized protocols.
- **Create a centralized, province-wide SPP application system** that allows survivors to apply once and be considered across multiple regions, reducing administrative burdens on both clients and housing workers.
- **Standardize documentation requirements across Ontario regions**, with transparent guidelines and clear feedback when applications are incomplete or denied, to reduce confusion and inequity.

## Other Recommendations:

- **Expand transitional housing and affordable, family-sized RGI units for mothers of all ages**, in accessible neighbourhoods with key services. Units should include child-friendly features like safe play areas, gardens, and kitchens that allow for child supervision.
- **Fund on-site mental health counselling and case management**, including dedicated services for children with special needs and women dealing with immigration, custody, or legal issues.
- **Train all shelter and housing staff** in trauma-informed care, Indigenous child welfare systems, disability inclusion, and confidentiality protocols to ensure safe, respectful, and rights-based service delivery.
- **Create and regularly update a consolidated resource list** of housing supports, legal aid, mental health services, and social programs to assist survivors and staff in navigating fragmented systems.
- **Consult with survivors directly** in the design and evaluation of housing programs and policies. Their lived experience is essential to creating services that truly support recovery, stability, and long-term safety.

*“We’re trying to rebuild our lives. We just need a home where we can finally breathe.”*  
– Focus group participant

## IV. I. Barriers to Affordable Housing for Women with Disabilities

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### **“I feel invisible in my own home.”**

Women with disabilities face far more than physical barriers when seeking safe, stable housing. They face systems built without them in mind, leaving them feeling invisible and unsafe in their own communities. Structural ableism, gender-based discrimination, and inaccessible policies combine to create a cycle of exclusion.

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## Stories from Women On The Move

**These insights come from Nellie’s Women On The Move program, a twice-monthly group providing a safe space for women with physical disabilities who have experienced abuse to gather, share, and support each other.**

One participant who uses a power wheelchair described what daily life looks like in her affordable housing building. Doorways are too narrow for her chair to pass safely. The party room and communal areas are locked for all residents without any explanation, denying her and others any sense of community connection. Her toilet does not flush properly, yet repeated maintenance requests are ignored by the superintendent, who instead redirected the issue to her personal support worker (PSW) — even though this is clearly outside the PSW’s scope of work. “It feels like he just doesn’t care about me because I’m disabled and have no power,” she said quietly.

Adding to her isolation is the PSW agency tied to her building. Because it is mandated through her affordable housing provider, she has no choice to change agencies even when treated poorly. **“They treat us like we’re nothing,”** she shared. Staff often respond rudely or dismiss her needs entirely, and she feels the superintendent is the same.

Both the PSWs and the superintendent know she lives alone and worries about retaliation if she complains, so they act as though she will never report them — ignoring her requests even more blatantly. Living alone, feeling unsafe, and knowing no one will listen has left her deeply disempowered in her own home.

Her experiences are not unique. CMHC (2018) found that households led by people with disabilities are far more likely to live in “core housing need”—housing that is unaffordable, inadequate, or overcrowded with no reasonable alternative.

**Even when units are labelled “accessible,” a 2017 study cited by WNHHN (2025) found that 40% remain inaccessible in practice. Women and gender-diverse people with physical disabilities are 16 times more likely to struggle finding suitable housing compared to their non-disabled peers.**

Another participant, a woman with a visual disability, shared how she spent hours at a community centre trying to apply for Rent-Geared-to-Income (RGI) housing. The city’s online system was incompatible with her screen reader, and staff had no idea how to help. Years later, she still does not know what type of housing she applied for, or where she stands on the waitlist.

In the meantime, she lives in private market housing where, when viewing her unit, she felt she had to pretend she was sighted to avoid discrimination by the landlord.

Now approaching retirement, she lives each day in fear. “My saving will never cover this high rent in private market nowadays,” she

said, her voice was disappointing. “I worry I will be homeless before I ever get an RGI unit.”

**Her fears are real. WNHHN (2025) reports that 13% of Canadians with disabilities have experienced hidden homelessness—more than double the rate of those without disabilities.**

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## No Priority, Nowhere To Go



Despite their urgent needs, affordable housing systems, including Toronto’s RGI program, do not prioritize people with physical, sensory, or cognitive disabilities. Without a formal priority category, women like these face decades-long waitlists while living in unsafe, unsuitable, or unaffordable housing. For them, accessible and affordable housing is not a preference—it is survival.

Emergency shelters are no better. A DAWN Canada study found that only 75% of shelters have wheelchair-accessible entrances, and just 5% provide Braille reading materials. For women with disabilities, escaping violence often means choosing between staying with an abuser or entering a shelter that cannot accommodate their most basic needs.

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**“It’s not just hard. It’s degrading.”**

These stories show how the intersection of gender, disability, and poverty traps women in a cycle of exclusion. As the Ontario Human Rights Commission (2016) states, ableism embedded in housing design and policy treats disabled people’s needs as burdens instead of rights. This is not a minor oversight. It is a systemic violation of dignity, safety, and equity.

# Recommendations

**To begin addressing these inequities, housing systems must move beyond surface-level accessibility. Policymakers should:**

- **Enforce strict accountability** for social housing providers, superintendents, and PSW agencies, with clear tenant complaint processes, protection from retaliation, and penalties or contract termination for discrimination, neglect, or abuse.
- **Develop application processes** that are screen-reader compatible, multilingual, and available through in-person assistance.
- **Establish a formal priority category** for people with disabilities, especially women and gender-diverse individuals, within RGI allocation systems.
- **Expand and maintain physically accessible, affordable housing stock**, with strong accountability for maintenance and tenant support.
- **Require all shelters, transitional housing programs, and community centres to** meet accessibility standards, including physical access, visual and auditory supports, and inclusive design.
- **Ensure staff training** in inclusive, disability-informed service delivery, anti-ableism, and human rights frameworks across all housing and support services.
- **Fund rights-based peer education programs**, empowering women with disabilities to advocate for themselves and others.

*“We’re trying to rebuild our lives. We just need a home where we can finally breathe.”  
– Focus group participant*

## V. Barriers to Affordable Housing for Indigenous Women



This section draws on a focus group held with staff from the Native Women’s Resource Centre of Toronto (NWRCT). Insights shared by Gillian Cruz, Housing Access Worker, and Samia Alli-Shaw, Housing Aftercare Worker, illustrate how Indigenous women face unique systemic, bureaucratic, and social barriers in securing affordable housing.

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### “We’re Left Out Before We Even Start.”

According to Gillian Cruz, many Indigenous women are excluded from housing systems before they even begin the application process. Clients are often street homeless, hidden homeless, or precariously housed, moving between shelters, transitional housing, and temporary arrangements. A central barrier is documentation: women frequently cannot apply for Rent-Geared-to-Income (RGI) housing or subsidies because they lack birth certificates, Social Insurance Numbers, or knowledge of their biological parents. While mobile ID clinics exist, Gillian noted these services often fail to meet Indigenous clients’ needs, since proving parentage or obtaining original birth records can be impossible.

Beyond documentation, Gillian observed another layer of exclusion built into the system. “It’s not that women don’t want to apply,” she reflected, “they’re excluded before they even start. Many women must first stay in a shelter and obtain a reference number to be prioritized for Rent-Geared-to-Income housing. But those who are hidden homeless—sleeping on friends’ couches or moving between temporary places—are not recognized in the same way. They often wait much longer for housing, which is deeply unfair.”

This lack of identification also cascades into other bureaucratic barriers, particularly tax requirements. RGI and subsidy applications demand up-to-date Notices of Assessment, yet many women cannot file taxes without proper ID, technology access, or a safe address to receive correspondence.

Without stable phones or internet, clients miss crucial calls from City housing staff or cannot navigate the online housing portal, further delaying or derailing their applications. These rigid processes reflect broader critiques of how housing policies often fail Indigenous communities, where households face disproportionate administrative barriers to subsidized housing, inconsistent rules across municipalities, and the absence of culturally safe supports in navigating applications. These systemic exclusions echo national findings that Indigenous women experience disproportionately high housing need, rooted in colonial displacement and ongoing barriers to accessing public programs (Women’s National Housing & Homelessness Network [WNHNN], 2020; National Inquiry into Missing and Murdered Indigenous Women and Girls [MMIWG], 2019).

## “It’s Not Safe Here.”



Samia Alli-Shaw highlighted that even when Indigenous women secure housing, safety is far from guaranteed. Toronto currently has only two Indigenous shelters for teens and two transitional housing sites for adults, leaving few culturally appropriate options. As a result, many Indigenous women avoid mainstream shelters, where they often feel unsafe or unwelcome.

Samia described situations where tenants were placed in RGI units but soon faced threats from

neighbors with weapons or ongoing violence. Transferring to safer housing requires a police report—a step many Indigenous women are unwilling to take due to long histories of mistrust and negative experiences with police. “It’s not safe here,” Samia explained, noting that mothers with children are especially vulnerable when forced to remain in unsafe environments. Inadequate property management further compounds these challenges, with reports of cockroach infestations, broken elevators, and ignored complaints leaving tenants feeling abandoned.

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## Power Imbalances in Supportive Housing

Supportive housing is intended to provide long-term, affordable housing alongside on-site or visiting supports such as case management, mental health services, and life skills programs. It is designed to help people who face complex barriers to housing stability, including those with mental health concerns, disabilities, or histories of homelessness, by combining a permanent home with wraparound supports.

However, as Samia noted, the model does not always deliver on its promise for Indigenous women. Instead, it can reproduce harmful power dynamics. Strict guest policies and constant monitoring leave residents feeling surveilled rather than supported. For Indigenous women, these rules often clash with cultural values of community and kinship, where hosting extended family and friends is central to daily life.

Moreover, when housing staff lack cultural knowledge, tenants are left without meaningful connection or access to appropriate resources. Instead of fostering trust, this dynamic reinforces feelings of disempowerment. These concerns echo findings from MMIWG, which urges policymakers to ensure supportive housing is culturally safe, Indigenous-led where possible, and structured to affirm autonomy rather than reinforce surveillance.

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## What Helps

Both staff members agreed that Indigenous women benefit most from culturally grounded and flexible supports. Indigenous-led housing, wraparound services (such as ID recovery, eviction prevention, and legal navigation), and culturally competent staff make a critical difference in navigating the system.

External research reinforces these findings. WNHHN (2020) emphasizes Indigenous-led solutions as central to addressing women’s homelessness, while CMHC (2019) highlights the importance of community connectivity and culturally relevant supports for stability.

# Recommendations

## To address these systemic barriers, policymakers and service providers must:

- **Simplify documentation requirements** for RGI and subsidies, acknowledging colonial histories that prevent many Indigenous people from obtaining ID.
- **Strengthen and expand mobile ID clinic services**, ensuring they go beyond issuing standard identification. For individuals who cannot provide details such as biological parents' information, clinics should offer extended supports, including assistance in tracing origins or linking clients with relevant Indigenous organizations and community services that can help navigate identity documentation.
- **Expand Indigenous-led housing options in Toronto**, ensuring accessibility, safety, and cultural relevance. This should include building more shelters and transitional housing programs specifically for Indigenous women and children, recognizing the shortage of culturally appropriate spaces in the city.
- **Ensure property management accountability** in RGI and supportive housing, with enforceable standards for safety, repairs, and tenant rights.
- **Train housing staff in cultural safety** and Indigenous resource navigation to reduce mistrust and power imbalances.
- **Invest in digital access supports** such as phones, internet, and in-person housing application assistance to close the digital divide.

*As Gillian concluded, “Indigenous women are resilient. But the system isn’t built for them—it’s built to keep them out. Until that changes, the housing crisis will never end.”*

## VI. I. Barriers to Affordable Housing for Gender-Diverse People

**“I chose to sleep on the street instead of staying in an all-gender shelter—I didn’t feel safe.”**



This was the reality for one gender-diverse participant from our focus group with The 519. For many gender-diverse people, Toronto’s housing and shelter systems not only fail to meet their fundamental needs but actively make them feel unsafe, unseen, and excluded. This profoundly disturbing experience mirrors national findings, where a significant 56% of gender-diverse individuals report being unable to access a shelter bed when needed, a rate dramatically higher than the 34% observed for cisgender women. (COH, 2024)

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### “They Always Misgender Me.”

The root of this pervasive insecurity often lies in inadequate services. Most shelters and housing programs lack staff training in gender diversity, culturally competent care, and affirming practices. Focus group participants shared being misgendered, ignored, or invalidated by staff—experiences that stripped away their sense of safety and belonging. “They treat us like we’re not even supposed to be there,” one person shared. These lived experiences are echoed in recent findings from Homeless Hub (2025), which highlight how 2SLGBTQ+ individuals in non-specialized shelters commonly face discrimination from both staff and residents, contributing to environments where people feel unsafe and silenced. This systemic failure is further underscored by

data showing that 41% of gender-diverse people report discrimination or judgment from shelter staff (COH, 2024). Rather than serving as a place of refuge, shelters often retraumatize gender-diverse individuals through microaggressions, exclusion, and neglect.

Staff from The 519 further emphasized during the focus group that transgender individuals in particular face even more severe barriers than the broader gender-diverse population. Whether in shelters or RGI housing, they often experience compounded discrimination, invisibility, and systemic neglect. These intersecting challenges make it far more difficult to access safe, stable housing, even when such services are technically available.

This profound lack of safety extends into supposedly supportive and affordable housing. One participant, a disabled gender-diverse tenant in an RGI unit, recounted a deeply frustrating experience where their superintendent routinely ignored essential repair requests—including a persistently clogged tap—despite repeated follow-ups. “He doesn’t take me seriously,” they shared, “maybe because I’m disabled, maybe because I’m gender-diverse person. Probably both.” Rather than support from these formal systems, participants said their only reliable refuge was the staff at gender-diverse community centres like The 519—places where they felt truly respected and safe. “That’s the only place I can go where people use the right name,” one noted, highlighting a critical gap in mainstream services.

## “I Can’t Tell Them I’m gender-diverse person— They Won’t Rent to Me.”



The struggle for safe housing begins even before entry into formal systems, deeply impacting access to the private rental market. Discrimination here is distressingly common, forcing some participants to conceal their gender identity during apartment searches out of fear of rejection. “I didn’t disclose I’m gender-diverse,” one participant admitted, “I was worried the landlord wouldn’t rent to me.” Their concern is sadly well-founded: a staggering 43% of gender-diverse people report discrimination from landlords or property managers, and 26% have tragically lost housing due to gender-based harassment or bias. (COH, 2024)

The harassment, however, often doesn’t cease once housing is secured. Participants frequently reported feeling unsafe even within their own neighbourhoods and buildings. From casual misgendering to overt hostility, gender-diverse individuals face constant stress navigating environments where they’re viewed as “other.” “I get stares, comments, and questions every time I walk down the hall. It’s exhausting,” one participant explained, illustrating the relentless nature of this burden. Indeed, 41% of gender-diverse people report feeling unsafe in their own homes or neighbourhoods. (COH, 2024)

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## Family Rejection and Youth Homelessness

For many gender-diverse individuals, the path to housing instability begins agonizingly close to home. Family rejection is a significant precursor to homelessness, particularly for youth. According to The Trevor Project (2021), a substantial 28% of LGBTQ youth in Canada have experienced homelessness or housing instability. This often occurs after being disowned or forced out of their homes following their coming out. These young people become especially vulnerable to exploitation, severe mental health crises, and prolonged cycles of homelessness, exacerbated by a dire lack of affirming emergency housing and long-term supportive services specifically designed for their needs.

# Recommendations

**To address the persistent housing barriers faced by gender-diverse people, policymakers and housing authorities must:**

## **Expand Access to Safe and Inclusive Housing**

- Fund more emergency, transitional, and long-term housing programs designed to affirm gender identity and prevent retraumatization.
- Create youth-focused housing programs with wraparound supports for those experiencing family rejection and homelessness.

## **Improve Safety and Accountability in Shelters and Housing Services**

- Mandate comprehensive, ongoing training for all shelter and housing staff in gender inclusion, trauma-informed care, and cultural safety.
- Develop accountability mechanisms to address staff discrimination or harm, with clear complaint pathways and consequences.
- Expand access to affirming supports through gender-diverse community centres, which participants identified as key sources of safety.

## **Strengthen Protections Against Discrimination and Harassment**

- Strengthen enforcement of anti-discrimination laws in both private and subsidized housing, with specific focus on gender identity and expression.
- Provide legal aid and advocacy support for gender-diverse tenants facing discrimination, harassment, or eviction.
- Develop anonymous reporting mechanisms for tenants to document discrimination or neglect in RGI and supportive housing.

## **Advance Inclusive Policy and System Reform**

- Create and fund a centralized system for collecting disaggregated housing data that includes gender identity and expression.
- Launch public education campaigns to raise awareness about 2SLGBTQ+ housing rights and challenge transphobia in housing and neighbourhoods.

*"I don't want special treatment—I just want to feel safe and respected where I live."* –  
Focus group participant

## VII. I. Barriers Faced by Land Developers in Building Affordable Housing



**Land developers face significant hurdles when attempting to build affordable housing, including high costs, complex regulations, and community opposition. Overcoming these barriers requires a multifaceted approach involving policy reform and financial support.**

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### High Land, Construction Costs, and Development Charges

One of the most significant barriers is the rising cost of land and construction materials. In urban areas, land suitable for development is scarce and expensive (Glaeser & Gyourko, 2002). This high initial cost makes it difficult to build affordable homes without government subsidies. Similarly, the price of building materials has increased, further driving up the final cost of a housing project. The Fraser Institute's analysis notes that land acquisition and ancillary costs are a significant portion of development costs (Lafleur, 2024). These high costs can make affordable housing projects financially unviable for land developers.

Moreover, even after overcoming upfront cost barriers, land developers face challenges in the long-term viability of affordable rental housing.

The City of Toronto's Affordable Housing Design Guidelines note that durable materials are preferred because they lower long-term maintenance costs for operators. However, these materials carry higher upfront costs and are required as standards, leaving developers with little flexibility. Given the already slim profit margins of affordable housing, such requirements further reduce profitability. Combined with high land and construction prices, this creates another disincentive for developers to pursue affordable housing projects.

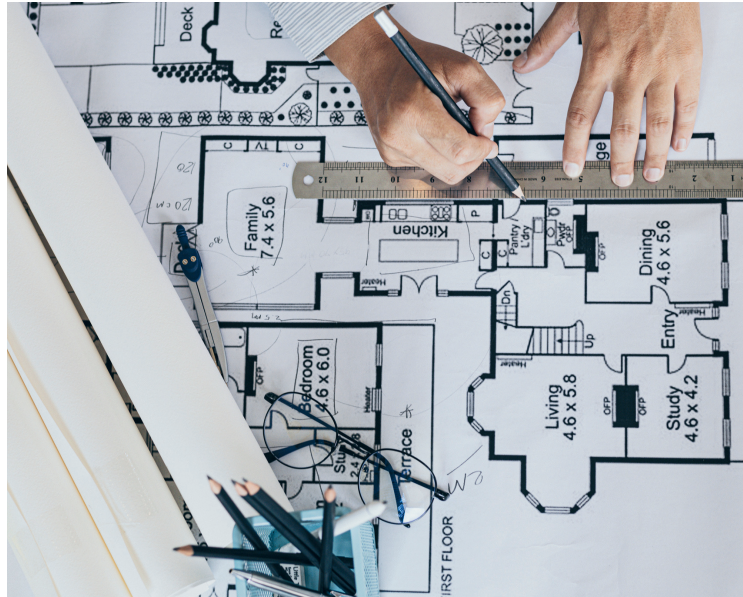
Development charges and related fees remain a significant financial hurdle for affordable housing projects. For example, the Canadian Helen Keller Centre (CHKC) is developing a 56-unit affordable and accessible apartment complex at 150 Eighth Street in Toronto for people who are deafblind or have other physical disabilities.

The building will offer one-, two-, and three-bedroom units, shared amenities such as a rooftop garden, and a 6,500-sq-ft life-skills training centre providing programs in ASL, cooking, and technology use.

Despite being part of Toronto's Open Door Affordable Housing Program and funded by the federal Rapid Housing Initiative, CHKC still faced a \$184,408 education development charge imposed by the Toronto Catholic District School Board—a fee that wasn't waived, unlike planning, building permit, municipal development, and parkland fees. This reflects the real-world scenario of an affordable housing project with a strong social purpose that must still manage the financial challenge of paying substantial fees. Even for projects with clear community benefits and targeted support for marginalized groups, such charges can add pressure to already tight budgets and timelines.

## Lack of Financial Incentives and Funding Limitations

Private developers are motivated by profit, and without adequate financial incentives, affordable housing projects are often less attractive than market-rate developments. The profit margins on affordable housing are typically much lower, especially when faced with high costs and regulatory hurdles. Without government support, such as subsidies or long-term funding programs, developers may prioritize higher-priced projects that offer a better return on investment. The Canada Mortgage and Housing Corporation (CMHC) has emphasized the need for more private investment and fewer development costs to meet Canada's housing needs (CMHC, 2025). The UBC report also recommends long-term funding commitments and fixed-rate government financing to reduce risk for developers (UBC, 2025).



In addition to limited financial incentives, funding constraints present another significant challenge, particularly when developers collaborate with non-profit housing providers. Many non-profits have limited capital and rely on grants, donations, or government funding, which can be unpredictable, highly competitive, and slow to secure. Developers often require partners to commit funds quickly to secure land or close deals, but delays in funding approvals can make non-profits less appealing as project partners. This funding gap can jeopardize opportunities for joint ventures between private developers and non-profits, especially in competitive real estate markets where speed is critical.

## Risk Perception and Regulatory Complexities

Developers may also perceive higher risks when working with non-profits, including concerns over limited ability to cover unexpected costs, inexperience with large-scale construction projects, and complex governance structures that can slow decision-making. Lenders, too, may hesitate to finance mixed projects involving non-profits unless there is strong collateral or a proven track record (Evergreen, 2023). These perceptions can reduce the willingness of developers to pursue partnerships that could otherwise deliver deeply affordable and community-focused housing.

Furthermore, many non-profits are subject to strict eligibility, reporting, and compliance requirements in order to access public funding. While these measures ensure accountability, they can also lengthen project timelines and reduce flexibility. From a developer's perspective, these additional layers of oversight can act as barriers, particularly when rapid decision-making and adaptive strategies are needed to address changing market or construction conditions. The result is often a misalignment between the timelines and operational approaches of private developers and their non-profit counterparts, making it harder to deliver affordable housing at the pace and scale required (Pomeroy & Schiellerup, 2023).

## Permitting and Approval Delays



One of the most persistent challenges for land developers in Canada is the lengthy and complex permitting process. The C.D. Howe Institute, as cited in a recent Storeys article, highlights that it takes an average of nearly 250 days to secure a general construction permit in Canada—making it the second-slowest among 35 countries of the Organization for Economic Co-operation and Development (OECD), behind only Slovakia, and roughly three times slower than the U.S. This delay occurs before construction can even begin, meaning that every

housing project—affordable or otherwise—starts with a built-in nine-month bureaucratic wait.

For affordable housing developers, these delays can be particularly damaging, as they increase holding costs, extend project timelines, and create additional uncertainty when funding commitments or land-use approvals have strict deadlines. Permitting inefficiencies is also a major risk factor for both private and non-market developers, recommending the streamlining of municipal processes and concurrent departmental reviews to mitigate delays (UBC, 2025).

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## Regulatory and Zoning Challenges

Complex and restrictive regulations create significant delays and costs. Zoning bylaws often restrict the density and type of housing that can be built, preventing developers from building multi-unit dwellings that could lower per-unit costs. The Fraser Institute points to onerous building requirements and a lack of streamlined processes as major barriers to housing supply (Lafleur, 2024). There is a genuine need to simplify the municipal approvals process, which can add significant time and financial risk to a project (UBC, 2025).

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## Community Opposition and NIMBYism

**"Not In My Backyard" (NIMBY)** opposition is a common challenge that adds considerable time and money to the development process. Residents may oppose new developments, particularly affordable housing, due to concerns about increased traffic or a perceived decrease in property values. A study from Habitat for Humanity Halton-Mississauga identifies NIMBY opposition as a "community obstacle" based on "perceived characteristics of people who will occupy the affordable housing units" (Habitat for Humanity, n.d.). The UBC report also suggests that a new model of community engagement is needed to reduce uncertainty and costs for developers (UBC, 2025).

## Skilled Labour Shortages

The construction industry is facing a significant shortage of skilled tradespeople, which can lead to delays and increased labor costs. With a smaller workforce, developers struggle to complete projects on time and on budget. This issue is noted by CMHC, which states that a "significantly larger and modernized workforce" is necessary to double the pace of housing construction to meet affordability targets (CBC News, 2025). The construction labor force is also aging and that a sizable portion of the sector is expected to retire, which will exacerbate the problem (UBC, 2025).

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## Recommendations

**Based on the barriers identified, here are concise recommendations to encourage developers to build more affordable housing.**

### **Reduce Developer Risk**

- **Preparing Land:** Ensure public land is "shovel-ready" by addressing contamination, completing zoning, and adding infrastructure prior to disposal.
- **Guaranteeing Financing:** Offer long-term, fixed-rate financing (e.g., 2% for 50 years) specifically for affordable housing projects to provide financial stability.
- **Streamlining Funding:** Establish consistent, long-term funding programs with open application windows, moving away from short-term, competitive cycles.
- **Bridging Capital for Non-Profits:** Create interim financing tools to help non-profits secure land and commit to projects quickly while awaiting grant or government funding approvals.

### **Streamline the Municipal Approvals Process**

- **Online Application Tracking System:** Implement a system where different municipal departments review and approve project applications simultaneously rather than sequentially. Applicants can also track their approval stage, see outstanding requirements, and view timelines. This would improve transparency, reduce delays from missing documents, and help especially non-profits with limited resources.
- **Increasing Transparency:** Publish a clear, step-by-step guide to the municipal process and clearly state requirements for public land at the stage when proposals are requested from developers.
- **Expedited Permitting for Affordable Housing:** Establish a priority permitting lane for projects meeting affordability thresholds to cut down wait times.

# Recommendations Continued

## Support the Non-Market Sector

- **Funding Pre-Development:** Provide consistent funding for initial work such as feasibility studies, architectural designs, and proposals.
- **Funding Diverse Projects:** Ensure funding models support a variety of housing types, including supportive housing, co-operative housing, transitional housing, seniors' housing, Indigenous-led housing, and deeply affordable rental units.
- **Separating Development from Operation:** Partner with builders to construct projects and then issue operating contracts to non-profit providers, rather than requiring them to take on development risk.
- **Capacity-Building for Non-Profits:** Offer training, technical assistance, and mentorship programs to help non-profits navigate large-scale housing projects and complex funding environments.

## Address Risk Perception and Regulatory Complexities

- **Standardized Partnership Frameworks:** Develop clear partnership agreements and standardized risk-sharing models between private developers and non-profits to reduce uncertainty.
- **Simplified Compliance Processes:** Streamline reporting and eligibility requirements for public funding while maintaining accountability, reducing delays caused by excessive administrative burdens.

## Address the Skilled Labour Shortage

- **Investing in Workforce Development:** Fund training programs and apprenticeships to create a larger, more modernized construction workforce.
- **Targeting Immigration:** Prioritize immigration streams for skilled trades to meet the high demand for construction workers.
- **Encouraging Local Recruitment:** Partner with community organizations to connect local residents — especially from underrepresented groups — to training and job opportunities in the construction sector.

## VIII. Conclusion



The findings of this position paper underscore a painful but urgent truth: Toronto’s housing system is failing the very people who need it most. Women experiencing gender-based violence, women with disabilities, Indigenous women, and gender-diverse people continue to be excluded from safe, affordable, and dignified housing due to systemic barriers entrenched in policy, service delivery, and land development practices.

From survivors of violence navigating impossible documentation requirements, to Indigenous women being excluded before applications even begin, to gender-diverse people facing daily discrimination in shelters and rentals, and women with disabilities rendered invisible in inaccessible housing systems—the inequities are not isolated, but interconnected.

These overlapping oppressions reveal how deeply patriarchy, colonialism, ableism, and transphobia are embedded in the structures that govern access to housing.

At the same time, land developers attempting to build affordable housing face overwhelming obstacles: soaring costs, regulatory delays, insufficient financial incentives, and community opposition. Without reform, these structural barriers will continue to limit the creation of deeply affordable housing stock, further entrenching scarcity for equity-deserving groups. Housing is recognized as a fundamental human right in Canada, yet for too many it remains a distant promise. The stories and perspectives shared in this paper demonstrate that access to housing is not only about units and policies—it is about safety, dignity, and survival.

To achieve true equity, housing systems must be restructured with the leadership of those most affected, ensuring that the voices of women and gender-diverse people are not just included but centered in decision-making.

Moving forward, bold and coordinated action is required across all three levels of government. Federal, provincial, and municipal governments must work in partnership with service providers, housing stakeholders, and communities to dismantle discriminatory eligibility requirements, enforce accessibility standards, expand Indigenous-led housing, fund inclusive and gender-affirming services, and create incentives and streamlined processes for developers to build affordable housing. Piecemeal solutions are not enough; what is needed is systemic change that challenges the status quo and reimagines housing as a shared public good.

**By listening to lived experiences and addressing structural barriers at every level, Toronto can move closer to a housing system that upholds its commitment to human rights, equity, and justice. Until then, women and gender-diverse people will remain at the margins of a system that was never designed for them. The time for transformation is now.**

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# Housing is a Human Right.

Everyone deserves safety, dignity, and belonging — no matter their gender, income, or ability.

Together, we can build a city where homes are designed for people to live and thrive, with compassion and inclusion at the centre.



## Join the Call for Action



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### How you can help:

- Advocate for policies that make housing affordable and inclusive.
- Challenge systems that exclude women and gender-diverse people.
- Partner with community organizations that center lived experience.
- Share this paper and amplify the message:  
**Housing is a Human Right**

Achieving housing equity requires **collaboration across all sectors** — governments, community organizations, and developers working hand in hand. When we unite our efforts and share responsibility, we can create **sustainable, inclusive, and equitable outcomes** for women, gender-diverse people, and all those seeking safe and dignified housing.

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