**28-04-23**

### FHA Submission to United Nations Habitat Survey

**A place to live in dignity for all: Making housing affordable**

**Report of the Special Rapporteur on the right to adequate housing to the   
78th session of the UN General Assembly**

**Questionnaire**

# National law, policies and jurisprudence relating to affordable housing

1. Does your country’s national law, including constitutional, housing or social protection law, refer to affordability of housing or provide any other guarantees to ensure a minimum standard of living? Or in its absence, are there national policies that refer to affordable housing or minimum standard of living? Please provide references and links to the respective key laws or constitutional provisions as well as policies.

In 2019, Parliament passed the [**National Housing Strategy Act**](https://laws-lois.justice.gc.ca/eng/acts/N-11.2/FullText.html)(the Act), which recognizes housing as a human right and commits the Federal government to further the progressive realization of the right to adequate housing.

* **The NHSA (Section 4) declares the housing policy of the Government of Canada to be:**
* **(a) recognize that the right to adequate housing is a fundamental human right affirmed in international law;**
* **(b) recognize that housing is essential to the inherent dignity and well-being of the person and to building sustainable and inclusive communities;**
* **(c) support improved housing outcomes for the people of Canada; and**
* **(d) further the progressive realization of the right to adequate housing as recognized in the International Covenant on Economic, Social and Cultural Rights.**

The [National Housing Strategy](https://assets.cmhc-schl.gc.ca/sf/project/placetocallhome/pdfs/canada-national-housing-strategy.pdf) (NHS) , among other things:

* sets out a long-term vision for housing in Canada that recognizes the importance of housing in achieving social, economic, health, and environmental goals;
* establish national goals relating to housing and homelessness and identify related priorities, initiatives, timelines and desired outcomes;
* focus on improving housing outcomes for persons in greatest need;
* and provide for participatory processes to ensure the ongoing inclusion and engagement of civil society, stakeholders, vulnerable groups and persons with lived experience of housing need, as well as those with lived experience of homelessness.

1. Please explain if there is any official definition or criteria to assess whether a household faces housing costs above the level of affordability in your country.

[**Core housing need**](https://www.cmhc-schl.gc.ca/en/professionals/housing-markets-data-and-research/housing-research/core-housing-need) **determines if a household can afford suitable and adequate housing in their community and is the standard definition of affordable housing for governments at every level in Canada.**

* **Core housing need is a 2-stage indicator. It helps to identify households living in dwellings considered unsuitable, inadequate or unaffordable. It also considers if income levels are such that they could not afford alternative suitable and adequate housing in their community.**
* **A household is in core housing need if they are paying more than 30 per cent of pretax income on housing costs (rent or mortgage, including utility costs) and/or is overcrowded or in uninhabitable housing, and it cannot access alternative local market housing that meets all three standards.**
* [**Critics**](https://maytree.com/publications/modernizing-core-housing-need/) **of the core housing need model for calculating affordability maintain that it underestimates how many people face housing challenges in Canada (for instance, CMHC doesn’t consider people experiencing homelessness in this category), including what these challenges may be.**

1. Please share any important court decisions in your country that relate to the issue of affordable housing or enjoyment of a minimum standard of living, including important judgements on State policies or measures aimed at ensuring housing affordability. Please provide if possible a short summary of the decision and a link to its text.

(e.g. judgements by international, constitutional, supreme or high courts, to rent control measures or rent freezes, to access to housing subsidies, public or social housing, non-discrimination and equal access to affordable housing etc.)

* **In 2013 Ms.** [**Tanudjaja**](https://www.canlii.org/en/on/onsc/doc/2013/2013onsc5410/2013onsc5410.html) **and her co-applicants filed an application alleging that wait times and the lack of social housing stocks in Ontario actually violated their right to life and security of the person (s.7) and their equality rights (s.15) under the Federal Charter of Rights and Freedoms.**
* **Ultimately, the remedies being sought by the applicants were: “(a) declarations that rights under section 7 and section 15 have been violated; (b) an order to implement national and provincial housing strategies; and (c) a supervisory order in respect of developing strategies.”**
* **Justice Lederer declared, “It was plain and obvious that the application could not succeed.**[**Section 7**](https://www.canlii.org/en/ca/laws/stat/schedule-b-to-the-canada-act-1982-uk-1982-c-11/latest/schedule-b-to-the-canada-act-1982-uk-1982-c-11.html#sec7_smooth)**of the**[**Charter**](https://www.canlii.org/en/ca/laws/stat/schedule-b-to-the-canada-act-1982-uk-1982-c-11/latest/schedule-b-to-the-canada-act-1982-uk-1982-c-11.html)**does not impose a positive obligation on the state to act to protect life, liberty or security of the person. In particular, s. 7 does not protect a right to affordable housing and does not impose an obligation on the state to provide it. While there may be a positive obligation in special circumstances, the applicants did not allege that any such circumstances existed in this case. The applicants' argument under**[**s. 15**](https://www.canlii.org/en/ca/laws/stat/schedule-b-to-the-canada-act-1982-uk-1982-c-11/latest/schedule-b-to-the-canada-act-1982-uk-1982-c-11.html#sec15_smooth)**of the**[**Charter**](https://www.canlii.org/en/ca/laws/stat/schedule-b-to-the-canada-act-1982-uk-1982-c-11/latest/schedule-b-to-the-canada-act-1982-uk-1982-c-11.html)**was also bound to fail. The impugned decisions and program changes did not deny the applicants a benefit given to others or place a burden on them that was not placed on others. Moreover, "homelessness" is not an analogous ground under**[**s. 15(1)**](https://www.canlii.org/en/ca/laws/stat/schedule-b-to-the-canada-act-1982-uk-1982-c-11/latest/schedule-b-to-the-canada-act-1982-uk-1982-c-11.html#sec15subsec1_smooth)**of the**[**Charter**](https://www.canlii.org/en/ca/laws/stat/schedule-b-to-the-canada-act-1982-uk-1982-c-11/latest/schedule-b-to-the-canada-act-1982-uk-1982-c-11.html)**. Finally, the issues raised in the application were not justiciable, as the courts are not the proper place to determine the wisdom of the kind of policy choices that were attacked in this case.”**
* **A recent court case involving the Charter rights of homeless encampment residents living in Kitchener, Ontario found that the resident’s right to life, liberty, and the security of the person were infringed by local authorities. Municipal by laws that prevented homeless encampment residents from occupying public property for the purposes of creating shelter without a permit, were suspended indefinitely.**
* **Justice Valente heard the** [**Waterloo**](https://www.canlii.org/en/on/onsc/doc/2023/2023onsc670/2023onsc670.html) **case. His decision upheld the rights of the encampment residents, on the grounds that, “the By-Law violates**[**section 7**](https://www.canlii.org/en/ca/laws/stat/schedule-b-to-the-canada-act-1982-uk-1982-c-11/latest/schedule-b-to-the-canada-act-1982-uk-1982-c-11.html#sec7_smooth)**of the**[**Charter**](https://www.canlii.org/en/ca/laws/stat/schedule-b-to-the-canada-act-1982-uk-1982-c-11/latest/schedule-b-to-the-canada-act-1982-uk-1982-c-11.html)**in that it deprives the homeless residents of the Encampment of life, liberty, and security of the person in a manner not in accordance with the principles of fundamental justice and is not otherwise saved by**[**section 1**](https://www.canlii.org/en/ca/laws/stat/schedule-b-to-the-canada-act-1982-uk-1982-c-11/latest/schedule-b-to-the-canada-act-1982-uk-1982-c-11.html#sec1_smooth)**of the**[**Charter**](https://www.canlii.org/en/ca/laws/stat/schedule-b-to-the-canada-act-1982-uk-1982-c-11/latest/schedule-b-to-the-canada-act-1982-uk-1982-c-11.html)**. I also declare that the By-Law is inoperative insofar as it applies to prevent the Encampment residents from living and erecting temporary shelters on the Property when the number of homeless individuals in the Region exceed the number of accessible shelter beds.”**
* **There have also been a number of cases (See both** [***Prince George [City] v Johnny***](https://www.canlii.org/en/bc/bcsc/doc/2022/2022bcsc282/2022bcsc282.html) **and** [***Prince George[City] v Stewart***](https://www.canlii.org/en/bc/bcsc/doc/2021/2021bcsc2089/2021bcsc2089.html)**) originating in Prince George, British Columbia, noteworthy for the judges analysis of the human rights and encampment residents and the way that police actions sometimes infringe the latter.**

# Data and trends on housing affordability

1. Is housing affordability regularly measured in your country, region or city, by the national statistical office or other entities? Please explain how housing affordability is measured and tracked. Where is the data published?

* **The** [**Canadian Mortgage and Housing Corporation**](https://www.cmhc-schl.gc.ca/en/professionals/housing-markets-data-and-research/housing-research/core-housing-need)**, the federally mandated quasi-governmental entity, has traditionally been responsible for collecting most of the Federal data and publishing statistics on housing.**
* [**Statistics Canada**](https://www.statcan.gc.ca/en/subjects-start/housing) **also collects and distributes data on housing, mainly through the administering of the national census and the Canadian Housing Survey.**
* [**Critics**](https://www.theglobeandmail.com/opinion/article-governments-across-canada-need-common-income-based-definition-of/) **have noted that National Housing Strategy programs often fail to adhere to the CMHC’s own definition of core housing need and, consequently, produce little in the way of deeply affordable housing.**
* **CMHC research on housing affordability in the NHS is done through a suite of federal initiatives dedicated to innovation and research programs in 6 priority areas:**

1. **Housing for those in greatest need - the vulnerable populations.**
2. **Social housing sustainability**
3. **Indigenous housing**
4. **Northern housing**
5. **Sustainable housing and communities**
6. **A balanced supply of housing**

* **Much of the information and research undertaken so far can be accessed through the CMHC’s webpage:** [**NHS outcomes and outputs**](https://www.cmhc-schl.gc.ca/en/professionals/housing-markets-data-and-research/housing-research/research-reports/nhs-outcomes)**.**

1. Has housing affordability increased or decreased in your country over the past 10 years? In which regions or cities has housing affordability changed and for whom?

* Over the past decade, the Canadian affordable purpose built rental stock has seen a sharp decline in it supply of affordable housing. The main driver of this is a phenomenon known as “erosion” of purpose built and multi-family rental stock. Housing policy experts and scholars have documented this as being the result of complex interrelated economic, financial, and regulatory conditions. Most notably the financialization of housing.

1. Please describe which households, persons or groups are at particular risk of being exposed to housing affordability in your country, region or city.

* **According to the Federal Government of Canada’s NHS, there are 12** priority groups. The current definition includes survivors (especially women and their children fleeing domestic violence); seniors; Indigenous peoples; people with disabilities; people dealing with mental health and addiction issues; veterans; 2SLGBTQIA+; racialized groups; recent immigrants (including refugees); and people experiencing homelessness. The NHS recognizes that people often live with multiple experiences of marginalization and thus an intersectional lens should be applied in discussion of each of these vulnerable groups.

<https://www.cmhc-schl.gc.ca/en/nhs/guidepage-strategy/glossary>

* This list is by no means exhaustive. Many civil society groups concerned with the right to housing have identified vulnerable segments of the population that were not prioritized by the NHS. Such as persons with precarious immigration status, **persons who have interacted with the criminal justice system, and, finally, low-income women and lone caregivers disproportionately experience hidden homelessness.**

(Please provide data on housing affordability disaggregated on the basis of household size, form of tenure (living in self-owned housing, rental, other), type and quality of housing (e.g. living in formal or informal housing); location (region, urban, rural), type of household (with or without children, single parent households), income, employment status, gender, disability, age, nationality, ethnicity, religious affiliation or immigration status.)

* Disaggregated data with respect to certain demographic categories in the housing sector (e.g. gender, disability, ethnicity, etc.) experiencing core housing need and enduring inadequate housing, tends to be poorly represented in national data bases on housing affordability. Some civil society and academic think tanks are starting to take up the challenge of filling in the gaps.
* The Office of the Federal Housing Advocate attempted to fill this gap in its work with Statistics Canada to publish a series of fact sheets on [Housing Experiences in Canada](https://www150.statcan.gc.ca/n1/pub/46-28-0001/462800012021001-eng.htm) addressing 24 different sub-populations. More work, however, is needed to obtain the type of disaggregated data needed to inform policy.
* One such example is the Housing Affordability Resource Tool (HART), launched with federal funding and affiliated with the University of British Columbia. HART’s mission is to fund and research data-based solutions to Canada’s housing crisis.

<https://hart.ubc.ca/>

* The CMHC recently published a study of evictions across the country. The evidence collected, including thousands of interviews with evicted tenants, indicates that racialized and Indigenous participants were four times more likely than white participants, to cite racial discrimination as a reason for their eviction.

<https://www.cmhc-schl.gc.ca/en/professionals/housing-markets-data-and-research/housing-research/research-reports/housing-needs/lived-experiences-eviction-canada>

1. May certain specific groups or persons, such as persons experiencing homelessness, living in informal settlements, students, asylum seekers or refugees, potentially be left out in data collection in relation to housing affordability?

* Historically, data collected on people experiencing homelessness in Canada has not been centralized or organized by the Federal Government. Rather, in the last decade it has become more common for municipal governments, in conjunction with civil society and volunteer-based organizations, to compile and carry out Point–in-Time counts on a local level, often publishing and sharing their results with other orders of government and the public.
* One such [study](http://homelesshub.ca/sites/default/files/SOHC16_final_20Oct2016.pdf) occurred in 2016, and focused on the segment of the population using emergency shelters across Canada.
* **The Homelessness Hub, an academic think-tank based out of York University, describes the challenge of collecting data on their website.**
* **“Estimating the number of people experiencing homelessness in Canada has been a source of debate for years. The Homelessness Partnering Secretariat has regularly used the estimate that between 150,000 and 300,000 individuals experience homelessness in Canada each year, with advocates often employing the higher number. However, there has never been a concerted, coordinated or consistent effort to enumerate homelessness in Canada. Until recently we have relied on ball-park estimates, based on unreliable and incomplete data.”**

[**https://www.homelesshub.ca/about-homelessness/homelessness-101/how-many-people-are-homeless-canada**](https://www.homelesshub.ca/about-homelessness/homelessness-101/how-many-people-are-homeless-canada)

**Causes and Consequences of housing unaffordability**

1. What are main reasons why housing is unaffordable to certain persons or groups in your country? Please provide if possible as well links to (scientific) studies that have analysed such reasons.

* **Financialization is a term used to describe how housing is treated as a commodity – a vehicle for wealth and investment – rather than a human right and a social good for people and communities.**
* **Globally and in Canada, investment firms have been purchasing rental buildings and then upgrading them and raising rents, forcing low-income tenants out of their homes. Because the business model associated with financialization demands short-term high yield profits, there is pressure placed on locating and purchasing housing that is deemed “undervalued”, which often means housing that is affordable and hence where the most disadvantaged and low-income communities are located. Financialization also affects other sectors of the housing system, including single-family homes, retirement communities, and long-term care homes.**
* **This trend worsened during the economic crisis caused by the COVID-19 pandemic. Real estate became a safe profit-making opportunity for large investors in a volatile market, further driving up prices and putting affordability at risk for those most in need.**
* **Financialization is a human rights issue. It has significant consequences for the affordability, security of tenure, and habitable conditions of rental housing for tenants. It is associated with elevated risks of illness and death for seniors and people with disabilities in long-term care facilities.**
* **The research estimates that about one-third of all seniors’ housing in Canada has been financialized, along with 20-30 percent of purpose-built rental buildings. Financialization of purpose-built rental has expanded dramatically in Canada since the late 1990s, with an estimated 340,000 units in multi-residential rental buildings now owned by large financial firms, and an estimated 20-30 percent of Canada’s purpose-built rental housing now owned by institutional investors. The acquisition of purpose-built rental portfolios by institutional investors has accelerated in the wake of the COVID-19 pandemic, with rental housing identified as a safe investment during a period of economic instability. The experts warn that a lack of transparent ownership data prevents researchers and policy-makers from knowing the full extent of financialization of housing in Canada.**
* **The Office of the Federal Housing Advocate led a research project that brought together five researchers to examine the growing role of private equity and investment firms in the residential real estate market and long-term care in Canada.**
* **The research demonstrates that the financialization of purpose-built rentals and long-term care have had significant impacts for tenants, seniors, workers, and communities. It also points to actions that governments at all levels can take to curb financialization and mitigate its impacts.**
* **This research and engagement will help the Federal Housing Advocate to develop legislative and policy recommendations for government to implement better protections against the financialization of housing and its impacts on people, disadvantaged groups, and communities. Measures to address financialization must put human rights first.**

[**https://www.housingchrc.ca/en/financialization-housing**](https://www.housingchrc.ca/en/financialization-housing)

1. What percentage of land is owned or otherwise controlled by the State or other public entities, as contrasted with private entities (both for profit and not for profit)? Please explain if there are any policies or laws which seeks to control the price of land, prevent land speculation including its supply and finance?

* **In Canada the vast majority of land is controlled by the states of various orders of government (federal, provincial, territorial, municipal, and Indigenous self government). This land is known as “Crown land” and is to be distinguished from privately owned land.**
* **“Crown land is the term used to describe land owned by the federal or provincial government. Authority for control of these public lands rests with the Crown of Canada, Less than 11% of Canada's land is in private hands; 41% is federal crown land and 48% is provincial crown land.”**

[**https://www.thecanadianencyclopedia.ca/en/article/crown-land**](https://www.thecanadianencyclopedia.ca/en/article/crown-land)

1. How many households have, during the last ten years been evicted because of their non-payment of housing costs? Please provide, if possible, more information on the socio-economic profile of the concerned households.

* **Data on evictions at a national/federal level, tend to be incomplete, and there is no comprehensive national data base which collects such information. As a result, housing researchers have expressed concerns about the lack of data on evictions available in Canada for at least the past decade. While some provincial and territorial governments may share data with the public, these gaps remain.**
* **According to a literature review from 2020, produced by the Institute of Urban Studies (University of Winnipeg) “Some general demographic trends emerge from these studies. For one, these studies point to affordability challenges (a high percentage of income spent on rent) as a primary factor leading to eviction. Poverty (along with discrimination) is cited as a key factor in housing instability. Sub-populations most likely to be at risk of eviction include youth, Indigenous people, older adults, recent immigrants, and single parent families—all of whom experience poverty at higher rates.”**

[**Evictions and Eviction Prevention in Canada**](https://eppdscrmssa01.blob.core.windows.net/cmhcprodcontainer/sf/project/archive/research_6/evictions-and-eviction-prevention-in-canada.pdf)

1. How many individuals, households or groups have, during the last ten years, been rendered homeless because of inability to afford housing? Please provide a breakdown of the socio-economic characteristics of such individuals.

* **A massive shortage of housing that is affordable, safe, and stable directly contributes to homelessness. Millions of Canadian families and individuals living in "core need" (paying more than 30% of their income on housing) are at serious risk of homelessness. Arguably, the biggest driver of this phenomenon is the lack of affordable housing across Canada.**
* **While it is difficult to calculate the precise figure of families, households and individuals that have experienced homelessness as a result of the housing sectors systemic failures and other factors associated with the decline of affordable housing stock, particularly in rental housing sector, some estimates have been made.**

1. Please describe how housing unaffordability affects the capacity of individuals and families to enjoy their other human rights including rights to work, health, education, and access to personal security in all its dimensions.

* **Encampments in Canada are one of the most visible and most serious failures of governments to protect the human right to adequate housing.**
* **Since the start of the pandemic, there has been a noticeable rise in encampments across Canada. Housing is becoming increasingly unaffordable and inaccessible. People are losing their livelihoods and their homes. Many social services and shelters are at maximum capacity.**
* **As a result, more people than ever before are having to live in tents or informal shelters to survive. Many have nowhere else to go.**
* **Although courts and human rights bodies are increasingly recognizing unsheltered homelessness as a human rights issue, people living in encampments face violations of their human rights on many fronts. Their dignity and rights are frequently ignored by municipal and other authorities.**
* **The conditions in encampments, coupled with the underlying failure of governments at all levels to ensure people can access adequate housing, are a violation of fundamental human rights, including the human right to housing.**
* **This human rights crisis is not going away. Canada must do better at meeting people's vital needs for shelter and safety. All levels of government have responsibility to find sustainable solutions that reinforce people's dignity and their human rights, particularly their right to adequate housing.**
* **To better understand this critical issue, the Office of the Federal Housing Advocate led a research project to provide critical information on the issue of encampments in five regions of Canada.**
* **The reports confirm that a punitive approach to encampments is failing. Tearing down encampments is unsafe and can amount to forced eviction, which is a serious violation of human rights. The researchers note that this approach does not address the underlying conditions that have led to the growth of encampments in the first place, and it does not respect the rights or increase the safety or housing security of encampment residents. Critically, a punitive approach also removes choice from encampment residents and destroys the mutual aid and community connections they have built to care for one another within a broken system.**

<https://www.homelesshub.ca/resource/overview-encampments-across-canada-right-housing-approach>

**Laws, policies, programmes and practices aiming to ensure that housing is affordable to all without discrimination**

1. Please share an overview of the laws, policies, programmes and practices adopted in your country/region/city to ensure that housing is affordable for all without any discrimination, Please, provide links to relevant official texts.

(e.g. affordable housing, social and energy cost subsidies, preferential mortgage, building support schemes, provision of social and public housing, of serviced land for self-construction, rent containment and rent control measures, taxation, measures to reduce housing vacancy, multi-stakeholder initiatives by State, local Governments, construction industry, housing providers, tenant unions etc).

* **As we are submitting to you on behalf of the Federal Housing Advocate, we will limit ourselves to an overview of federal laws, policies, programs, and practices adopted over the last decade.**
* **Significantly, the passing of the** [**National Housing Strategies Act**](https://www.canlii.org/en/ca/laws/stat/sc-2019-c-29-s-313/latest/sc-2019-c-29-s-313.html#sec13.2)**, represented a shift in the Federal government’s strategy on affordable housing towards a more human rights-based approach.**

* **This statute established the office of the** [**Federal Housing Advocate**](https://www.housingchrc.ca/en/about-us/about-us)**, as well as the** [**National Housing Council**](https://nhc-cnl.ca/publications/post/analysis-of-progress-of-bilateral-national-housing-strategy-programs-research-report)**, two bodies that are mandated to provide greater accountability, research, and reporting with respect to housing rights violations in Canada.**
* **The NHSA was preceded by the announcement in 2017, by the Federal government, on a new policy framework (the NHS) that introduced a number of programs aimed at improving housing affordability, accessibility, and adequacy.**
* **Among the proposed programs that were included in the initial $82 billion dollar Federal investment, some were more focused on access to affordable housing than others. The most critical of these were the** [**Rapid Housing Initiative**](https://www.cmhc-schl.gc.ca/en/professionals/project-funding-and-mortgage-financing/funding-programs/all-funding-programs/rapid-housing) **and the** [**National Housing Co Investment Fund**](https://www.cmhc-schl.gc.ca/en/professionals/project-funding-and-mortgage-financing/funding-programs/all-funding-programs/co-investment-fund)**.**

1. Please share an assessment of the success, limitations or potential failures of the above mentioned laws and policies in your country/region/city, including any studies or independent evaluation reports related to them. Who has benefited from them, who has not? What has worked well, what - less? What lessons can be learned? What could potentially be replicable in other countries/regions/cities?

* **The NHS and the framework it created are over five years old now (the halfway point in its ten year lifespan) and continues to enjoy the support of the Federal government, civil society groups, as well as many in the media and the public. However, lately, it has been the subject of vigorous criticism from many housing rights advocates and state institutions (the** [**Auditor General of Canada's report on homelessness**](https://www.oag-bvg.gc.ca/internet/English/parl_oag_202211_05_e_44151.html)**, for instance) for failing to live up to its promise, thus far.**
* **In an** [**opinion piece**](https://www.housingchrc.ca/en/we-need-a-new-plan-to-end-Canadas-housing-and-homelessness-crisis) **published last November, the Advocate listed these shortcomings:**
* **A failure to significantly reduce core-housing need (the NHS called for 500,000 households to be removed from this category, by 2030).**
* **The number of Indigenous peoples experiencing homelessness continues to be disproportionately large.**

* **The NHS has been unable to measure empirically whether the programs it implemented are benefiting priority groups (seniors, people with disabilities, etc.) identified as being in greatest need of affordable housing.**
* **In fact, the Advocate’s** [**reports**](https://www.homelesshub.ca/resource/financialization-housing-canada-project-summary-report) **suggest that just the opposite has occurred. With NHS housing programs expanding the financialization of housing and contributing to the erosion of affordable, multi-family, purpose built rental stock, mainly by emphasizing low interest loans to private developers building rental housing.**
* **Having said all this, the Advocate tempers her critique of the NHS with a measure of optimism. Indeed, the NHS ought to be redesigned to better reflect the obligation to, among other things, progressively realize the right to adequate housing enacted into law by the NHSA.**

* **This could be done by revising the NHS architecture in four key areas:**
* 1- Provide better housing for Indigenous people, no matter where they live. The Strategy must address Canada's legacy of colonialism that results in systemic housing inequality for Indigenous people.
* 2- Make programs purpose-built to address the needs of people experiencing inadequate housing and homelessness, and ensure that they show measurable results for people most in need, including the Strategy's priority groups.
* 3- Prioritize the development and acquisition of housing supply that is permanently affordable and provides community value. Research shows that fewer than five percent of housing units produced by the largest NHS capital programs are affordable to households experiencing core housing need and homelessness. Instead of unnecessarily financing what the market is already producing, NHS investments must return community value through housing that is affordable, accessible, and adequate for people excluded from the housing system.
* 4- **Demonstrate the leadership role of the Federal government and a coordinated approach to involve all levels of government in solving the housing crisis. The Strategy requires concerted action and leadership from the federal government as well as other orders of government to end the housing crisis.**