

Finding Room for Families:

National Occupancy Standards and the Right to Housing

Prepared for the National Housing Council
Neha Panel

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**Balanced
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of Housing**

Academic / Community Partnership



**BC Society of
Transition Houses**

Land Acknowledgment: The Balanced Supply of Housing at the University of British Columbia is on the traditional, ancestral and unceded territories of the xʷməθkʷəy̓əm (Musqueam) People, and we would also like to acknowledge that Metro Vancouver is on the unceded territory of the Coast Salish Peoples, including the territories of the xʷməθkʷəy̓əm (Musqueam), Skwxwú7mesh (Squamish), Stó:lō and səliłwətał/Selilwitulh (Tsleil-Waututh) Nations.

The BC Society of Transition Houses' office is located on unceded Coast Salish territory, shared by the Skwxwú7mesh (Squamish), xʷməθkʷəy̓əm (Musqueam) and səliłwətał/Selilwitulh (Tsleil-Waututh) Nations. As this research discusses the lack of safe, affordable and appropriate housing after violence experienced by BC women, BCSTH recognizes that this includes all First Nations throughout the province. The displacement of Indigenous peoples from their lands and other ongoing effects of colonialism are foundational to the disproportionate number of Indigenous women and girls experiencing homelessness and violence. BCSTH recognizes the importance of valuing the connection between all living things and created systems. The issues of homelessness and violence can only be fully addressed through sustainable systemic change.

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Introduction

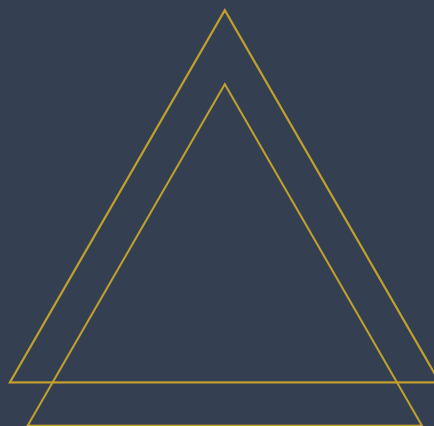
For women, Two Spirit, Trans, and gender-diverse people who have experienced gender-based violence, finding housing that meets their needs can be incredibly difficult. The challenge is often compounded when social affordable housing providers rely on National Occupancy Standard's (NOS) to allocate a limited supply of safe, affordable homes based strictly on the family's size (i.e., number of people) and composition (i.e., the sex and age of household members).

Helena's¹ story illustrates how these challenges create barriers. While pregnant with her fifth child, Helena made the difficult decision to leave her husband due to escalating violence and concern about her family's safety. Once homeless, Helena realized that social housing providers had no "suitable" units available for her and her family based on NOS guidelines—and turned her away.

As weeks turned into months, the stress of finding adequate housing for her family took a toll on her health. Without a stable place to live, Helena became malnourished and by the time she gave birth, was experiencing multiple organ failure. It was only after her daughter was born that Helena was finally able to secure a one-bedroom unit in transition housing:

"I think that had we not had someone willing to break the rules and get us into that one bedroom we'd still be homeless, and I would not be in— I would probably be dead frankly."

Helena and her family now live in safe and affordable housing with help from a non-profit housing provider, but their struggle to find a home is not unique. There is a severe shortage of social affordable housing across Canada, and NOS restrictions pose a significant barrier for many families. In a 2022 British Columbia Society of Transition Houses (BCSTH) member survey, **96% reported that NOS (which are used in British Columbia to allocate social affordable housing) negatively impact women.**



¹ Pseudonyms have been used throughout this report and some personal details have been changed to protect the confidentiality of interviewees.

Drawing on 18 interviews with women who had experienced gender-based violence and 5 expert interviews, this report explores the role that NOS play in limiting families' access to safe and affordable housing. The qualitative research findings illustrate a direct conflict between NOS and the right to housing as outlined in the **National Housing Strategy Act**, which was signed into law in 2019. This legislation affirms housing as a human right and mandates its progressive realization under the **International Covenant on Economic, Social and Cultural Rights**.

As a society, we have a responsibility to ensure everyone has access to safe, affordable housing that supports their health and wellbeing. This report lays the groundwork for an alternative framework to NOS—one that specifically supports the right to housing for women, Two Spirit, Trans, and gender-diverse people—and provides actionable solutions for each level of government.



Background

In 2019 the Canadian National Housing Strategy (NHS) Act was signed into law, forming legislation that mandated the progressive realization of the right to housing in Canada (National Housing Strategy Act, 2019). The Act came into effect after over three decades of disinvestment from social affordable housing (Hulchanski & Shapcott, 2004) and just as the world was going into the global COVID-19 pandemic that highlighted the central role of housing to population health and wellbeing (Farha, 2020; Parker & Leviten-reid, 2021). While the NHS Act was the culmination of years of research and advocacy, there continues to be questions about what the right to housing looks like and for whom (Schwan & Ali, 2021; The National Right to Housing Network, 2019). This is especially true for women and children fleeing violence, who often do not experience home as a refuge and during the pandemic faced limited or non-existent services as providers grappled with changing health guidelines and restrictions (Parker & Leviten-reid, 2021). Under international human rights law the right to adequate housing includes the following seven criteria; 1. Security of tenure, 2. Availability of services, materials, facilities, and infrastructure, 3. Affordability, 4. Habitability, 5. Accessibility, 6. Location (i.e., provides access to employment, schools, childcare etc.), and 7. Cultural adequacy (Office of the United Nations High Commissioner for Human Rights, 2014). This definition stands in contrast to the narrow way that Canada has measured “core housing need” for the last three decades.

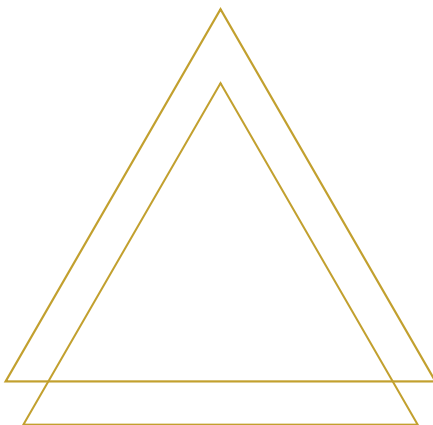


Core Housing Needs

In the Minister of Finance's Economic Statement in November 1984 there was a formal call for housing review and consultation following concerns with a growing federal deficit and the goal of gaining "greater fiscal flexibility" (Michael H. Wilson, 1984). The resulting report "A National Direction for Housing Solutions" introduces core housing needs as the "key eligibility criterion for social housing assistance" (Bill McKnight, 1990, p. 11) The role of core housing needs was therefore *"to assist low-income households who are unable to obtain suitable, adequate and affordable housing in the private market"* (Bill McKnight, 1990, p. 11). The following year, in 1991, Statistics Canada released data on core housing need in Canada and estimated that 1.16 million households (12%) were in core housing need (Canadian Housing Need, 1991) As of 2022, 1.63 million households (11.1%) were in core housing need (Canadian Mortgage and Housing Corporation, 2022). **In contrast, as of 2022 21.3% women renters were in core housing need, meaning that they were twice as likely as the general population to be in core housing need** (Canadian Housing and Mortgage Corporation, 2025).

Core housing need continues to be used today to identify Canadian households that are eligible for government assistance. There are three components of core housing need (CMHC, 2020):

- **Affordability:** housing is considered to be affordable if the household spends less than 30% of their before tax income on housing costs.
- **Adequacy:** is a measure of housing quality and identifies households living in housing that needs major repairs.
- **Suitability:** is a measure of crowding that uses NOS. NOS propose that two people can share a bedroom if they are living in a common-law relationship, different genders and under the age of 5, or the same gender and under the age of 18. In all other situations NOS propose that one person per bedroom is acceptable.



If the household does not meet any of the above standards (e.g., lives in housing in need of major repairs) **and would not be able to find adequate and suitable housing that is affordable to them in their current location**, they are considered to be in core housing need. This caveat allows for households that do not meet the standards of core housing need but would be able to move to affordable housing that is adequate and suitable to be excluded. For example, if a household is paying more than 30% of their before tax income on housing, but there is suitable and adequate housing available and affordable to them, they are not considered to be in core housing need.

As originally proposed, NOS were meant to help the federal government track the number of households that are not able to afford housing that has enough bedrooms for them, given their size and composition. Ideally, this would translate into funding to the provinces to build housing with the number of bedrooms that households in core housing need require. If NOS were used in this way, they could be helpful to advocate for the right supply of social affordable housing units. For example, if there are 500 households with five or more people in them in Metro Vancouver that are not able to afford a 3+ bedroom unit, NOS could help estimate the need for affordable three-bedroom units needed in the area. However, following the adoption of core housing need, and the shift of responsibility for housing from the federal government to the provinces, virtually no social affordable housing has been built, let alone sufficient housing for larger families. Data from the survey of social affordable housing in Canada paints a stark picture: almost half (49%) of Canada’s social affordable housing was built before 1980, and the majority (88%) was built before 1995 (See Figure 1).

Canada, number of units of social affordable housing
by year of construction, Social Affordable Housing
Survey Canada

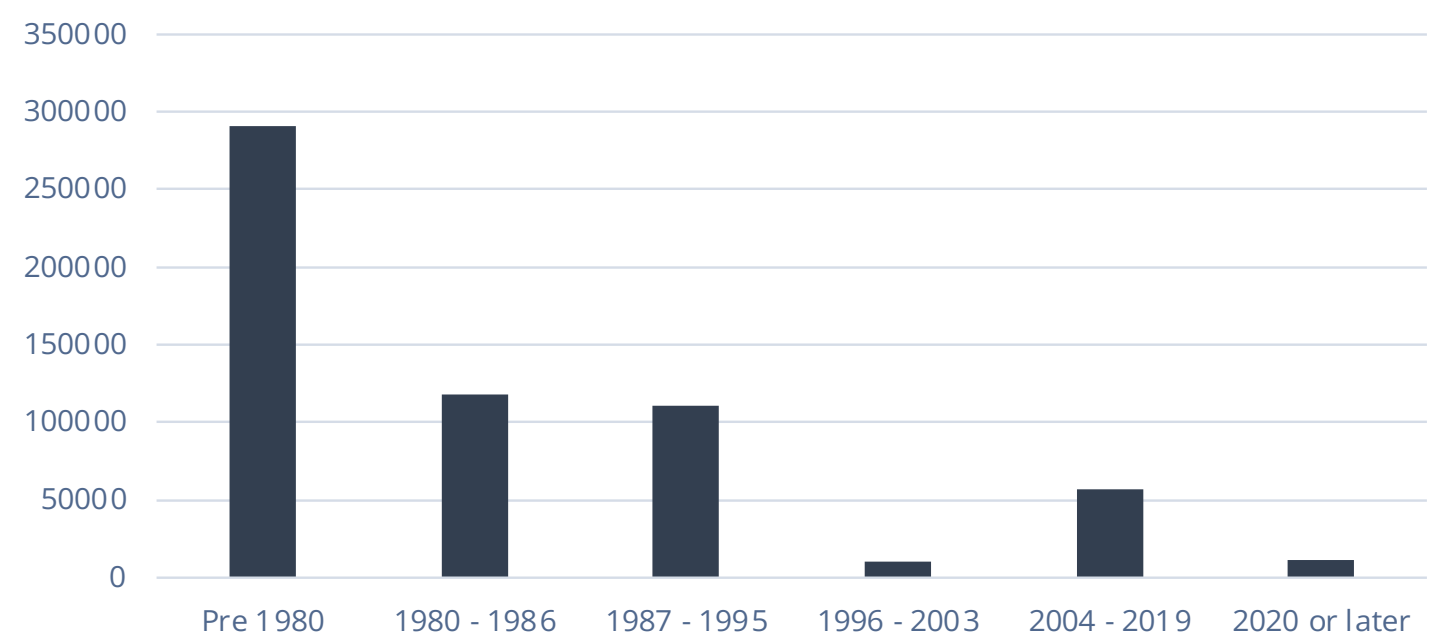


Figure 1: Canada, number of units of social affordable housing by year of construction, Social Affordable Housing Survey Canada

To compound on this, many of these existing units do not meet the needs of larger families. Under 25% of social affordable housing units in Canada have more than 2 bedrooms (23%) (See Figure 2). According to NOS a single-mother with one child would require a two-bedroom unit, making it so that **most social affordable housing does not meet the needs of even the smallest households.**

Percentage of social affordable housing in Canada, by unit size: Social Affordable Housing Survey 2023

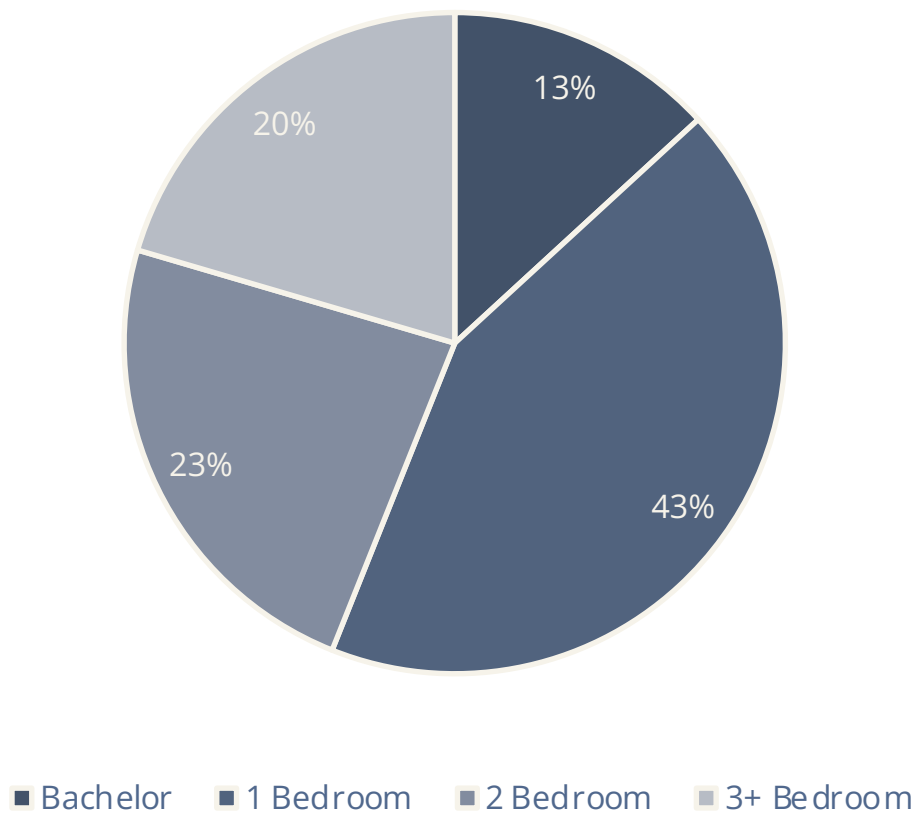


Figure 2: Percentage of social affordable housing in Canada, by unit size: Social Affordable Housing Survey 2023

These needs are especially pressing for families that have experienced or are experiencing gender-based violence. BC Housing data that tracks the number of households that are i) on a waitlist for social affordable housing and ii) have experienced family violence provide a stark picture of growing need in the Metro Vancouver region. Between 2016 and 2024 the number of two-person households waiting for social affordable housing more than tripled and the number of three-person households waiting for social affordable housing more than quadrupled (see Figure 3).

BC Housing applicant households experiencing family violence by household size, Metro Vancouver 2016-2024

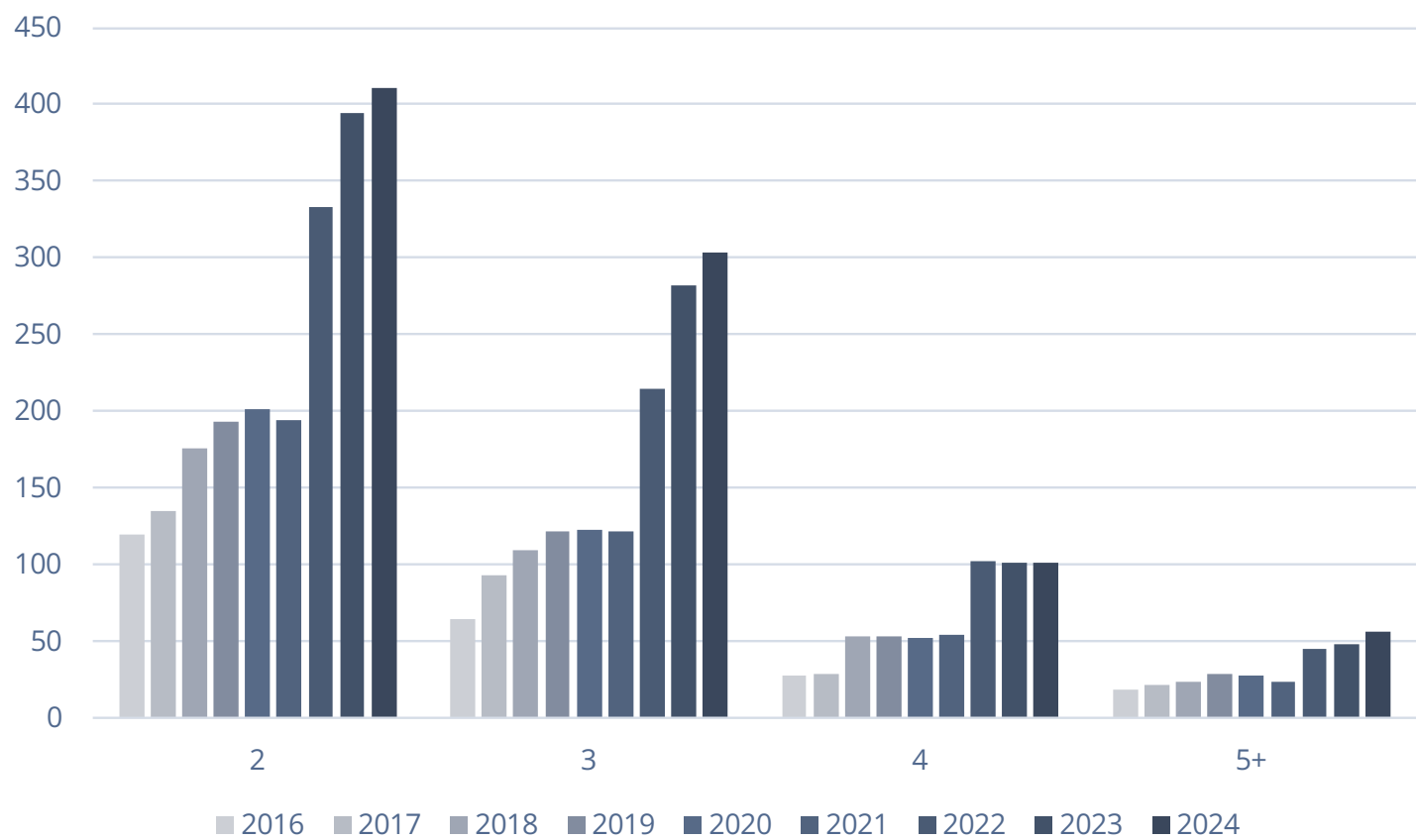


Figure 3: BC Housing applicant households experiencing family violence by household size, Metro Vancouver 2016-2024

Furthermore, year over year, the proportion of households on BC Housing waitlists that have experienced family violence in the Metro Vancouver region has steadily increased (see Figure 4). In 2016, 13% of households on the waitlist for social affordable housing in Metro Vancouver had experienced family violence. By 2022, 30% of households on the waitlist for social affordable housing in Metro Vancouver had experienced family violence (see Figure 4).

Percentage of households on BC Housing waitlists
experiencing family violence, Metro Vancouver 2016-
2024

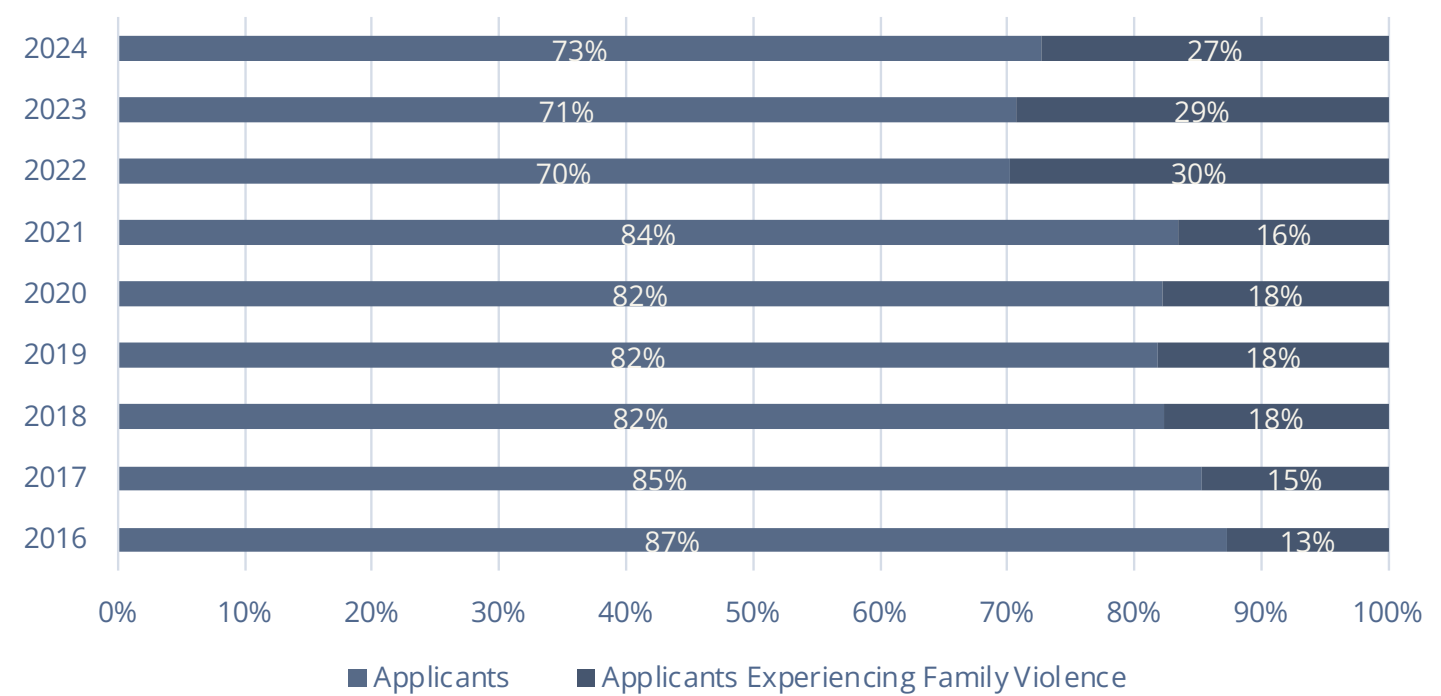


Figure 4: Percentage of households on BC Housing waitlist experiencing family violence, Metro Vancouver 2016-2024

Intersecting Vulnerabilities: National Occupancy Standards, Colonial Legacies, and Housing Precarity

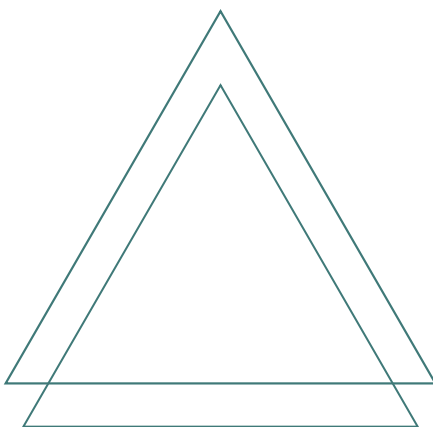
According to international human rights law, the right to adequate housing includes conditions of habitability under which “housing is not adequate if it does not guarantee physical safety or provide adequate space, as well as protection against [the elements]” (Office of the United Nations High Commissioner for Human Rights, 2014). On the other hand, CMHC uses NOS to measure housing suitability (i.e., crowding). NOS assumes that bedroom allocation equates to safety, yet there is no empirical basis for this claim. McCandless (2020, p. 86) argues that NOS provided guidelines that CMHC could use to ensure that the provinces did not over-house families living in social affordable housing (i.e., provide households with too many bedrooms). In recent decades there has been rising concerns that NOS is contributing to housing precarity and homelessness, especially among women (Knowles et al., 2019) and immigrant and refugee families (Hiebert et al., 2005; Miraftab, 2000; Sherrell, 2011). A second related concern is that NOS does not accurately reflect the different cultural norms and values that are found within Canadian society (Lauster & Tester, 2010; McCartney et al., 2021)

NOS provides an interesting case-in-point of how the cultural norms and values of white-settlers permeate Canadian policy. At their core, policies like NOS are shaped by the long history of settler colonialism where the white nuclear family is privileged and protected (Phillips, 2009). This is clear in the historical accounts of NOS that reference government consultation with housing organizations in the 1980's, but provide sparse detail on who attended these consultations and how gender and age came to play such a central role in shaping NOS (McCandless, 2020; McCartney et al., 2021). In fact, there is no empirical justification for the age and gender restrictions prescribed by NOS (Gray, 2001). While there is some evidence that infectious disease rates among children increase as crowding increases (New Zealand Government, 2018) this does not provide justification for age and gender restrictions to room sharing. Rather these restrictions are justified as reflecting the ‘cultural norms’ of ‘Canadian society’ without any critical reflection on who is included or excluded (Lauster & Tester, 2010; McCandless, 2020; McCartney et al., 2021). This same pattern is reflected by the adoption of NOS by other countries with similar colonial histories, including New Zealand and Australia, with the justification of holding similar social norms (Goodyear et al., 2012).



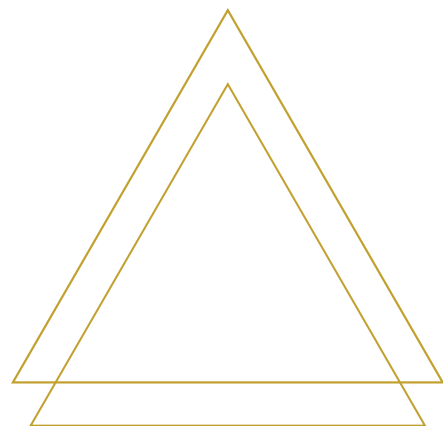
The prioritization of white-settler norms and values over and above the norms and values of other cultures and traditions has had an especially severe impact on Indigenous Peoples in Canada (McCartney et al., 2021). Self-identified Indigenous people in Canada are more likely to live in unsuitable housing, especially in the north, and the differences between NOS and Indigenous ways of living is a tension felt both on and off reserve (McCartney et al., 2021). In an engagement session on housing that was held by the Native Women's Association of Canada one participant reported, *"Children[s] services state that children cannot share a room and then kids are removed from the home and put into foster care where they end up being molested. Children's services are abusing their power nationwide."* (Native Women's Association of Canada, 2019). Child apprehension can also directly result in homelessness among parents and extended family because qualifying for social affordable housing is often predicated on children occupying the unit (Christensen, 2016). Once children are apprehended, caregivers often become ineligible for their social affordable housing resulting in their eviction, and in many cases homelessness.

A lack of transparent rules and regulations governing women and children's right to housing can have terrible consequences for families. In British Columbia, BC Housing and the Ministry of Children and Family Development (MCFD) must coordinate to help meet the needs of families in need. According to results from BCSTH's 2022 member-survey, 68% of anti-violence service providers cited concerns about MCFD involvement due to NOS. A review of BC Housing and MCFD policies by BCSTH (See Parr Report Summary Submitted to Neha Panel) found clear reference to NOS in BC Housing documents, however no mention of it in publicly available MCFD documents. In a 2021 survey of 205 families with children from across British Columbia, many parents reported that they were denied access to housing because their family did not fit NOS guidelines (first call, 2023) The lack of clear guidelines from MCFD, and use of NOS by BC Housing undermines the child-specific right to housing as outlined in Article 27(1) of the Convention on the Rights of the Child (CRC). Wind and Vols argue that under the Article 27 of the CRC the obligations of parents and the state are co-dependent, "on one hand, parents should try to ensure the right to adequate housing for their children. On the other hand, states must bring their policies in line with children's rights, preventing children from ending up on the streets. States are obliged to help parents (or children) if there is a need for assistance or support" (Wind et al., 2023).



The history of NOS is also inherently gendered and founded on heteronormativity. White women's roles as wives and mothers are central to the reproduction of colonial norms and values (Allen, 2020; Goeman, 2013; Million, 2013) and home is often the stage where gender inequity is justified and perpetuated (Young, 1997). Both cisgender² and transgender women have been historically disadvantaged by systems of power, and this is reflected by the unequal burden that women face as lone-parent and their higher incidence of core housing needs and housing precarity. **According to 2021 census results, 26.35% of single women-led households in British Columbia (BC) experienced core housing need compared to 13.4% of households in the general population** (HART, 2024). This reflects larger issues of pay inequity, care giving responsibilities, the higher burden of disability and many other related issues that directly impact women (first call, 2023).

For many women one important driver of housing precarity and homelessness is gender-based violence (Kahan et al., 2020; Knowles et al., 2019; Miraftab, 2000; Oudshoorn et al., 2020). Gender-based violence is defined as sexual or physical abuse based on a person's gender or gender role that contributes to their lower social status or power (McCloskey, 2016) This includes cisgender and Trans women's experiences of violence as well as people who experience violence because they are a sexual or gender minority (e.g., intersex, non-binary). Examples of gender-based violence includes intimate-partner violence, sexual abuse, early, or forced marriage or pregnancy, and cyber abuse among others (Cameron & Tedds, 2021; Kahan et al., 2020; McCloskey, 2016) Furthermore, gender's intersection with race, citizenship and ability, among other things shape the risk of housing precarity and homelessness (Parker & Leviten-reid, 2021). Dion Million(2013) documents how colonialism and patriarchy have worked together in ways that contribute to the high rates of intimate-partner violence that Indigenous women face, as well as their dispossession from their lands and communities. Furthermore, on a societal level violence faced by Indigenous and racialized women is often minimized or erased (Granzow, 2020; Holmes et al., 2015; The National Inquiry into Missing and Murdered Indigenous Women and Girls, 2019). By privileging a Eurocentric, nuclear-family model, policies like NOS fail to recognize the diverse living arrangements and needs of marginalized communities and entrench systemic barriers to safe and adequate housing. Addressing these inequities requires a fundamental rethinking of housing policy—one that moves beyond rigid occupancy standards to prioritize the lived realities and rights of all people in Canada.



² Cisgender generally refers to a person whose gender identity and assigned sex at birth align with cultural expectations (Ferguson, 2019).

Methods

Lived Experience and Expert Interviews

For this research eighteen women were interviewed. Participants identified as women who had experienced gender-based violence (in one case it was the participant's daughter that experienced gender-based violence), had one or more dependent, and had experienced occupancy standards as a barrier to housing. The call for participants was shared through BC Society of Transition Houses' newsletter and members (BCSTH) in June of 2021. In 2022 participants were also recruited in through Ontario Association of Interval and Transition Houses members with a focus on the City of Toronto.

The interviews were completed by phone or zoom and audio recorded. Interviews were completed in English, except for three interviews that were conducted in Spanish with the help of an interpreter. The interview guide used open-ended questions designed to understand women and families' housing trajectories. The conversation focused on women's current housing and space use, their housing needs, and housing design elements that they felt would facilitate their safety and stability. Interviews were transcribed verbatim and coded using the qualitative software MAXQDA. A Gender-Based Analysis Plus (GBA+) was used to better understand the intersectionality of homelessness and housing precarity as experienced by women who had experienced gender-based violence. All names are pseudonyms and some personal details have been changed to protect confidentiality.

Five semi-structured expert-interviews were also completed in 2021 by Kaayla Ashlie as part of her Capstone project "Finding a Better Fit: Rethinking Occupancy Standards for British Columbia" (Ashlie, 2022). The sample included two BC-based social housing providers, two BC-based housing organizations and one academic with expertise in NOS. Interviews were conducted over zoom, audio-recorded and transcribed.



Table 1: Demographic Characteristics of Lived Experience Experts

Demographics	Number of Participants (n)	Percentage (%)
Age		
20-29	2	11%
30-39	8	44%
40-49	5	28%
50+	3	17%
Race		
White	3	17%
Visible Minority	15	83%
Interview Language		
English	15	83%
Spanish	3	17%
Number of children		
1	7	39%
2	6	33%
3	2	11%
4+	3	17%
Occupancy		
Underhoused according to NOS	10	56%
Suitably Housed according to NOS	8	44%
Type of Housing		
Transition or Second Stage Housing	4	22%
Market Rental	8	44%
Subsidized Housing	6	33%

Results

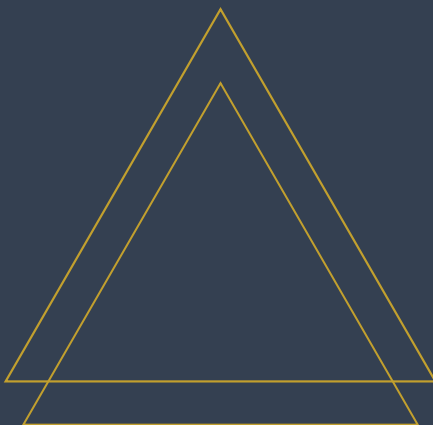
The realities of social affordable housing scarcity

Many women acknowledged that NOS represented an ideal situation where they and their children would each be able to have the space they needed. However, they also understood that this ideal situation did not match the reality of housing availability. Helena was a white female in her forties that had five children. When she was pregnant with her fifth child, she left her husband and she and her children became homeless (see example vignette in introduction). Helena describes having to stay highly organized to survive homelessness with her family. The family depended on a network of friends that allowed them to couch surf. Helena knew there wasn't subsidized housing available when she left her husband, she and her children had been on housing waitlists for five years and she had been told by property managers that housing that met her family's needs was "imaginary":

"We've had property managers say, you know, it's just never going to happen, like I'll put you on a list, but this is imaginary, just so you know this is not helpful."

Both the size of Helena's family and the gender composition of her children meant that there were no units that met the family's needs. Furthermore, Helena faced a family court order that forced them to stay in a specific geographic region. As she explained:

"They didn't have the number of bedrooms we would need because I had children spanning ages and sexes that were not compatible. So, the biggest that was available, like I know there was one place we found – that was the other thing, we weren't allowed to move. We were under a court order that we couldn't leave our community."



The need to re-examine NOS was also voiced in the expert interviews. As one housing provider outlined:

"I think just overall that [NOS are] outdated that they've never been reviewed that they were just developed and then that's it. Like no one's looked at or adjusted them or had any really sort of consultation around, you know, is this even working anymore? Is this even necessary anymore? But those questions haven't been asked."

The unrealistic "fantasy" of ideal housing sizes was recognized by Alicia as well. Alicia was a white woman in her early thirties with two children. She had left her husband when she was pregnant with her second child, and by her own account had no understanding of the resources (or lack of resources) available to women in her situation. Because Alicia's children were under five years old, she qualified to live in a two-bedroom subsidized housing unit according to NOS, but when a housing manager filled out the application with her, they put down that she would need three bedrooms. This was before learning the gender of her unborn child. After living in a women's shelter for four months, Alicia had moved into more stable second-stage housing, however, her lack of permanent housing was a source of stress:

"It causes a lot of anxiety not having secured long-term housing, even when you're in a safe temporary situation."

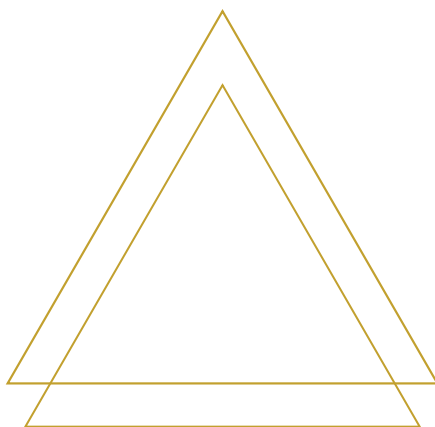


When considering her family's future, Alicia understood that it would be ideal to have a three-bedroom home that they wouldn't have to move from when her children "aged out" of being able to share a room, however, her priority was to find safe, stable housing:

"I remember as a child being so attached to where I was living and so (moving is) just hard on a kid and hard when you're trying to get grounded in the midst of all this chaos, to have to make that change again. But then of course it's like that's ideal fantasy world versus reality might mean, okay for the sake of securing stable housing, two bedrooms would work for sure."

The reality was that Alicia was living with her mother and two children in her second-stage housing unit. While things were tight, they were making it work. Most importantly, the second stage housing had been flexible and allowed her parents to share her space, which provided her with the support she needed. One housing organization outlined the problem in this way:

"[Housing providers] are trying to make decisions that seem reasonable, logical, equitable, in how they're allocating their units. And it's almost to me just like a series of events, where suddenly now you have these providers who are just seeking any sort of guidance on how to make really difficult decisions about incredibly limited housing stock. And it just seems reasonable that the government's guidelines around overcrowding is the place to start."



Navigating social affordable housing waitlists

Ten of the eighteen women were under-housed according to NOS. Kimi was a Japanese woman in her late thirties. She had been separated from her husband for three years. She had a seven-year-old son and nine-year-old daughter with special needs. They lived in a two-bedroom market-rental basement suite. She and her son shared the first bedroom, and her daughter had the second bedroom. Kimi was not able to afford the rent on her income alone and this often placed the family in crisis. When she had applied to live in a new subsidized housing building nearby, she was told that she qualified for a three-bedroom unit, however, a limited number of three-bedroom units in the new building meant that she wasn't given housing. Because Kimi had limited income and her daughter had special needs her support worker thought that there would be a high chance that she would receive housing. When she didn't receive a three-bedroom unit, she wondered if she could move into a two-bedroom unit:

"The most important thing is (that) I have affordable house [...]. (In) the future I understand if they become teenagers, it's kind of difficult [...] to live in two bedrooms especially (because) one of my kids is special needs and even though now, you know, she needs to have all her room to calm her mental. But two bedrooms, two available. Now my daughter takes one bedroom for herself, then son and (I) share one bedroom. So, I really wanted to have option, you know, for my current situation."

Kimi was told that she was not eligible to move into a two-bedroom unit because of NOS. She was heartbroken when she learned that she would not receive housing and broke down trying to explain her family's needs:

"I just need affordable housing I (can) take care of just by myself. And even though, you know, (I just have a) small income from (my) part-time job, if I can take care of it, you know, life is much more stable. [...] I don't need three bedrooms."





Kimi's support worker was able to give her a clear understanding of how NOS shaped the housing selection process, however, they had navigated NOS as rules, rather than guidelines. In contrast, Tanya's support worker was able to help her challenge the NOS. Tanya was a mother of three, that identified as Indigenous, Caribbean and Welsh. When she and her children moved into transition housing she wanted to stay in her community where she had strong ties to her family, especially her grandmother. At the time of the interview, the family was living in a one-bedroom unit, and Tanya's support worker was advocating for NOS not to be applied to her so that she could gain access to social affordable housing in her community:

"That's my only frustration is knowing that we do great if we're all in one room, but when it comes to moving into a home [...] – we're restricted to, you know, "No, you guys all need a bedroom or your own space."

While some housing providers clearly understood that NOS did not need to be applied to the families they served when allocating social affordable housing, there remained uncertainty among many providers. As one researcher reported:

'For members that have really dug into the NOS, they probably would have been able to confirm either through BC Housing or CMHC, that they're not mandated to rely on them as a criterion for determining suitability of housing. And at the same time...there are some members that are confused as to whether or not their funding is tied to the standard.'

This aligned with women's experiences as many families reported a lack of transparency in the waitlist process. Ishya was a South-Asian woman in her mid-thirties and mother of three. When she left her husband, she had a three-month-old, four-year-old and seven-year-old. The family lived in transition housing for two months and then moved into second-stage housing for a year. When their time in second-stage housing was complete they moved into a two-bedroom basement suite, however, the rent was well outside of Ishya's means. After three years of being on the waitlist and two years of daily housing precarity she phoned to follow up on her case:

"I didn't want to disturb, like, annoy the subsidized housing people by calling them again and again, but in recent months I have called twice, because my situation changed, and I said, I really now (have a) desperate need for subsidized housing."

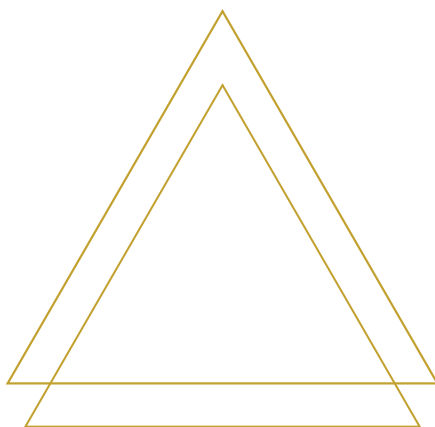


Ishya's main concern was the lack of affordability. She didn't have many complaints about her housing and she and her children were happy room-sharing. However, the use of NOS by subsidized housing providers meant that she wasn't given the choice to live in a two-bedroom apartment. Helena (mother of five) provides a clear outline of the same problem:

"I know that there's occupancy standards from safety as well. But I feel like it's being used as an excuse for a barrier more often than it's being used to support safety. I think anyone who was asked what's safer being on the street with your children or being under-housed with your children would agree being under-housed is safer."

Housing providers also provided examples where families chose to room-share. As one housing provider outlined:

"There were so many instances where, you know, some of the larger families would move into a townhouse and the third bedroom was never used. Those cases, the kids really want to share a room or especially when they are just adjusting and settling into a new home, and they wanted to be closer to their mother. They wanted to be together. They didn't want to be sort of separated out throughout the home."



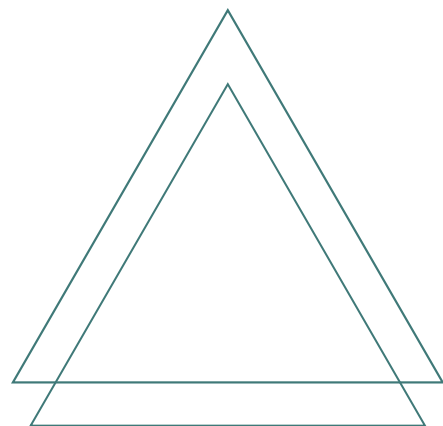
No place to go

This tension between the NOS definition of suitability and how women and children actually occupied their units was difficult for many families to reconcile, especially when they faced extreme unaffordability in market housing. This also placed pressure on women to return to the homes they had fled. Janelle, a Black mother of four was living in a basement suite, but looking for another place to live at the time of the interview. She outlined her options as follows:

“My husband is now trying to look for [housing] for us and I have no choice but to go because I don’t – I can’t afford – I don’t have money and the houses are now much more expensive than it was when I got this house. So, I can no longer afford to – this size of house. With the trauma of what the other kids are doing I can’t even afford it anymore. I just cannot emotionally. I left an abusive situation for a reason because of the psychological impact even though it was not physical abuse and now I’m going back because of housing.”

The lack of affordable housing left Janelle and her children without safe and adequate housing. In many of these situations, NOS became a barrier to housing rather than a tool that women could use to help advocate for safe and affordable housing. In Helena’s case, she and her children were homeless before the housing provider “broke the rules” (i.e., NOS) allowing Helena and her children to move into a one-bedroom apartment.

“All I know is that if someone hadn’t broken those rules [NOS], I would certainly be dead, and my children would certainly not be okay. [...] It begs the question: why does someone have to break the rules to save a life and family, you know, and this amount of poverty?”



Helena intimately understood that in most cases housing providers continue to see NOS as rules, even if it resulted in homelessness and housing precarity of women and their families. All too often, these choices are justified as being in the families' best interests. However, housing providers also cautioned that they needed alternatives to NOS:

"I do think we probably need to have something in the absence of [NOS], I don't think housing providers are going to be comfortable with, well, 'it's up to you to decide whether or not a family of five can go into a one bedroom, or if they need a three bedroom'. I do think that they will need some sort of guidance or best practices that they can adhere to."



Feeling under-housed

In addition to the women living in market housing and second stage housing who had experienced NOS as a barrier to housing due to the size of their family or gender composition of their children, there was a second group of participants that lived in subsidized housing or had previously lived in subsidized housing and directly experienced being under-housed (n=3). These experiences are also important to take into account and provide an important reminder of the need for flexible family-led policy.

Vera was a white female in her mid-forties and the mother of two adolescent boys. Under the NOS children of the same gender can share a room until they are eighteen years old, however, one of Vera's sons had a chronic health condition and required his own room. Before leaving her husband, she had applied for subsidized housing and received a doctor's note supporting her request for a three-bedroom. Finally, after three years of waiting for housing, she went to the head office in person to plead for a safe place:

"Because I was fleeing from abuse, [...] I went to the Head Office myself and [...] there was a very nice lady there that I talked to and I just told her about my dire situation [...]– I said I'll even take something that has mold and I'll clean it all myself, I just need a safe place."

Soon after Vera made her visit to the head office, she was offered a two-bedroom unit. In desperation she took it. It is important to note that Vera moved directly from living with her abusive partner into subsidized housing. Many of the women interviewed reported that they remained with their partners while they waited for subsidized housing, rather than moving to a shelter or transition house. The bedrooms in the townhouse that Vera moved into were very small and her sons' room barely fit a bunkbed. Since moving into the two-bedroom townhome four years ago, her younger son had started sleeping in the closet because he no longer fit in the bunkbed. Vera was very grateful to have social affordable housing, and the thought of moving scared her, but she also wished that her initial request for a three-bedroom unit had been heard:

"Like I don't know [...] how I put one foot in front of the other; I'm completely overwhelmed on all levels, health-wise, emotionally. So, for me I can't even think about moving right now. But it would have been nice if initially when I applied [for housing] I felt heard and if [moving into a three-bedroom unit] had happened initially then I wouldn't have to worry about now transferring again and going through an extra cost and emotional."

Adolescence was often a time when parents identified that their children needed more space. This was the case for Marina who had immigrated from Mexico to Canada. She was in her late twenties and had four children. The family lived in a two-bedroom subsidized apartment. Marina, her partner and her new baby slept in one of the bedrooms, while her daughters (ages three and eleven) and son (age seven) slept in the second bedroom. When asked if she knew that her housing was not considered suitable under the NOS, she responded through her interpreter:

“No, they didn’t tell me at the time but now I am aware that this place is not appropriate for the number of members in my family. And especially now my daughters and my son are sleeping in the same bedroom and my (older) daughter feels like she needs to have more space for her privacy.”

The family was in desperate need of more space and the non-profit housing provider was phoning for updates on her case weekly. Marina and her family were left feeling even more cramped because they lived in an area of a major urban center where they did not feel safe to go outside. Marina’s eleven-year-old daughter had been assaulted on the sidewalk near their apartment and had been afraid to walk to school after the incident. The COVID-19 pandemic also meant that many programs and opportunities to get out of the house had been shut down, leaving the family feeling trapped. The experience of not feeling safe when they left their housing was shared by three other immigrant and refugee women who were interviewed.

In some cases, women’s desperation to find safe and affordable housing did lead to them accepting housing that did not meet their needs as Marina and Vera’s cases highlight.

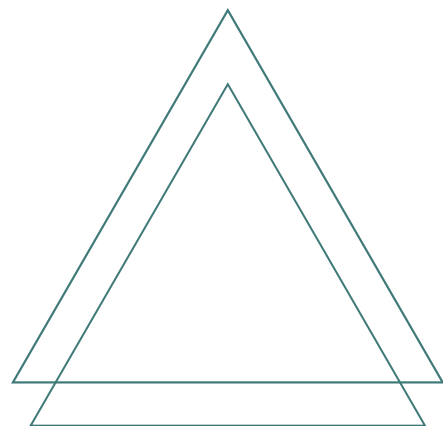


One housing provider reported that families had better housing outcomes when there was only one child per bedroom:

"I think there's some judgment with respect to who's applying for housing and who's eligible for the housing and their ability to make decisions for themselves. I think sometimes [housing providers] see themselves as like, well, 'we are the experts like, we know how this works.' You know, [housing applicants] are in a desperate situation, they're not thinking clearly, they don't understand this [unit] is actually not going to be suitable for them [...] I don't know if they always trust applicant's judgment, and think that people know what is best for them. And they're able to make those decisions for themselves. "

The use of more stringent suitability guidelines than the NOS (i.e., one child per bedroom) raises questions, especially given the historic scarcity of larger units and incredible need that many households reported. As Helena outlines, there is an underlying tension here where many programs are set up to encourage women's autonomy, but wider institutions are set up in ways that take that autonomy away:

"The theory behind providing all these [government] supports [...], is to properly support parents to be able to make their choices. So then at the end of the day they participate in all these programs and they come in and they go I know what my child needs. And the government goes you're not allowed to make that choice. And immediately negating all of the investment we've put into this person for them to be able to take ownership of their family and this path that they're taking."



Self-assessments are one tool that value the diverse needs of families seeking housing. As one housing organization outlined:

"Self-assessments definitely give you a sense of self governance, it gives you a sense of control. You know, these guidelines aren't forced on you. And I think what I think self-assessments give the Indigenous person and their family the freedom to express what is needed. So, I think it's a good policy option, and I think it's like a bit of a paradigm shift, right?"

This paradigm shift recognizes the autonomy of families and their decision-making capacity. This was reflected in the clear vision that women shared of their housing needs.



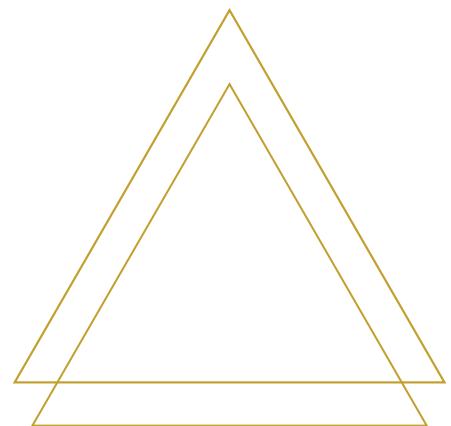
Navigating child apprehension

Ria was a Hispanic woman in her mid-seventies and lived with her two adolescent grandsons. The children had been apprehended by MCFD four years earlier after Ria and the boys had taken shelter in a transition house, and then moved into a two-bedroom subsidized apartment. After the boys apprehension Ria was homeless and lived on the couches of friends while fighting to have the boys returned to her care. Two-and-a-half years after they had been apprehended, she finally received a two-bedroom apartment. The boys had been moved to several different foster homes throughout their time in care, but they weren't returned to Ria for another six months. They were only returned after one of the boys ran away from the foster family and reported being physically abused. As her interpreter reported:

"One of the children [...] ran away and then he came to the ministry [MCFD], [...] and then they found out that these children were being physically abused. And so, the ministry moved [them in] with Ria right away, without any preparation or transition, but luckily Ria had this two-bedroom subsidized housing. And so, that was the same [day] that they moved in with her."

Unfortunately, the family's trials were far from over. They did not feel safe in the neighbourhood they lived in, and there was also a toxic smell coming from behind the fridge that Ria believed contributed to a string of illnesses. The family also couldn't open their windows because people often smoked outside of their first-floor apartment. Furthermore, sharing a bedroom was out of the question for the two boys who had experienced extensive trauma in foster care. As Ria recounted through her interpreter:

"I couldn't stand the subsidized housing, because (there was no) space for the boys, one of the boys was sleeping with me [...] there are some difficulties with the boys, and they are still fighting and arguing. And one of them got scared that the other one is going to hurt him and then he started sleeping with me in my bedroom."



One housing provider saw the NOS as an advocacy tool in these types of situations:

“One of our property managers filled a two-bedroom at one of our sites with a woman and her three-year-old daughter and her four-year-old son. As soon as the son hit five years old, the mother said, ‘I want three-bedroom now’. And we will give her that three-bedroom. She would not have the right to ask for that if we didn’t have NOS.”

Unfortunately for families like Ria’s, NOS suggest that two children of the same gender under the age of 18 are suitably housed if they share a bedroom. Ria applied to transfer to a three-bedroom apartment but knew it could be years before the family was provided with suitable space. In desperation, she moved into a three-bedroom rental apartment in another area of the city. While the apartment was well outside of her means, it provided all of them with some much-needed respite. As Ria reflected on her new home:

“I feel happy and good right now in this new place and I feel [like I am] in a different country compared to my [previous] house. I feel it’s in a happ[ier] country now.”

Ria and her grandsons felt hopeful for a brighter future. In their previous community, one of Ria’s grandsons had experienced intense bullying at school and stopped attending. Looking forward to the upcoming new school year they were all feeling hopeful that things would be different.



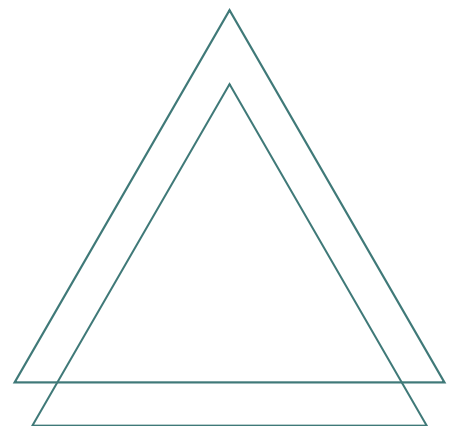
Neighbourhood satisfaction

Neighbourhood characteristics were very important for many of the women that were interviewed. Aleida was a refugee mother in her twenties that lived with her toddler in a two-bedroom subsidized housing unit. There was open drug use on the streets outside and Aleida did not feel safe leaving her housing. In thinking back to the decision, she contributed it to desperation. As her interpreter outlined:

“In the moment of need [I said] yes but once the family is there then [I] realized [I] made a big mistake to have said yes. But desperation sometimes does that.”

Aleida dreamed of housing in an area where she felt free to socialize with other families and could feel the wind on her face. While she was adequately housed according to NOS, she did not feel safe and felt she’d made a “big mistake” saying yes to her current location. Ria and Aleida’s cases provide a clear example of how intimately linked stable and safe housing is to other outcomes. Helena (mother of five) also made this link:

“The current occupancy standards, they don’t reflect the needs of the community to prevent homeless and ongoing poverty. Then that enforce[s] being stuck in poverty in extremely dangerous situations. Because a lot of times when somebody hasn’t lived it, they don’t understand how correlated every single piece of all of that is. If you’re under-housed, what are the repercussions across your education and your ability to care for your children and your ability to find work and to maintain your house?”



Housing precarity and poverty were intimately linked in the research, and the repercussions reverberated through the lives of families. As Helena points out, this creates extremely dangerous situations as families struggle to make ends meet. Helena's family had also faced extensive surveillance by MCFD, and she had barely avoided having her children apprehended. Even when women do find temporary relief in appropriate, safe housing, it may not be affordable: when Ria (grandmother of two grandsons) had found appropriate housing for herself and her grandsons, her monthly income did not cover her rent. Like many women-led households across British Columbia her family faced an uncertain future, and any unforeseen expenses would almost certainly place the family back into crisis.



Discussion

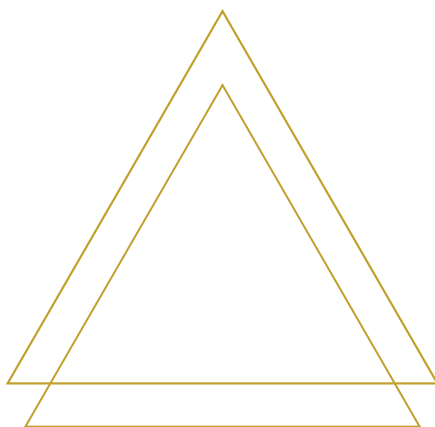
The use of NOS has often been justified by housing providers as a necessary tool to ensure that people receive the housing they need. This study demonstrates that NOS act as a barrier to housing and extends the housing precarity and homelessness of women and their families. NOS work in insidious ways from the very beginning of women's attempts to flee violence: the application process automatically assigns the number of bedrooms to a particular family, and there are often very long wait times for larger units. For example, Ishya's family of four would require a minimum of three bedrooms according to NOS. The incredible demand for three-bedroom units meant that Ishya had to wait longer to move into subsidized housing than if she had the option of moving into a two-bedroom unit. This was despite the fact that she was living in a two-bedroom market rental unit with her children. This extended her period of housing precarity and placed her family in crisis as she constantly wondered how she would pay the bills. Any of the women living in market housing could have been used as an example, as they all faced housing costs that were well over fifty percent of their income.

One of the major concerns with the application process, besides the lack of flexibility that families faced when choosing the housing that was most suitable for them (i.e., number of bedrooms), was the lack of transparency in the waitlist process. Many families were left waiting for years for housing that met their needs, or in Helena's (mother of five) case, they were told point-blank that housing stock that could accommodate the size and gender composition of their family didn't exist. The lack of transparency contributed to the uncertainty in women's lives, and was often a major source of stress. The limited supply of social affordable housing for families exacerbates this problem, as housing providers have no shortage of "eligible" families to choose from when filling units. Kimi's (mother of two) situation was one of the few cases where she could clearly see her opportunity to move into social affordable housing slip away as families that met eligibility criteria moved into housing, while she was left in crisis because of the lack of three-bedroom units. The limited supply of larger units directly impacts women with larger families.



NOS created situations where families were unable to identify what types of housing worked for them. While there were clear cases where families were under-housed, NOS also did not account for situations where people needed more space than occupancy standards allowed for. Both Vera and Ria's cases provide important examples of situations where families needed more space than stipulated by NOS. In Vera's case, her sons' need for separate rooms had been something that she understood from the very beginning of her journey. She knew what her family needed, but three years of waiting for housing while living in an abusive relationship had left her desperate for anything that became available. The reality of current subsidized housing supply is that Vera's wait for housing would likely have been extended had she not accepted her current two-bedroom townhouse. According to data published by CMHC from October of 2020, only 2.5% of market rental apartments had three-bedrooms or more in British Columbia (CMHC-SCHL, 2017). Furthermore, the average rent for market housing with two bedrooms (October 2024) was \$2883/month (Bourassa-Ochoa et al., 2024), well above income assistance rates in the province. As of August 1st, 2023, a single-parent household could receive \$710 in support allowance, and a shelter allowance of \$790. The disparity between market rental rates and income assistance contributed to the ongoing poverty that many women who had experienced gender-based violence faced as they struggled to make ends meet.

As previous research with immigrant and refugee families has demonstrated, NOS also appears to disproportionately impact women from Black, Indigenous and People of Colour (BIPOC) communities (Hiebert et al., 2005; Miraftab, 2000; Sherrell, 2011). Fifteen of the eighteen women interviewed (83%) identified as a visible minority, and three of the eighteen women spoke limited English. One experience that was unique to the non-English speakers was that they all reported being housed in an area where they felt unsafe. Ria (grandmother to two grandsons) had gone so far as to move out of the neighbourhood into a rental apartment in a 'happier' area of the city. While occupancy standards are often conceptualized as restrictions that are internal to housing, these women clearly articulated that the lack of access to safe spaces outside of their housing contributed to feeling isolated and confined. While more research is needed to determine the extent to which the location of housing plays a role in the health and wellbeing of women who have experienced gender-based violence, these findings suggest that non-English speaking women were more likely to be placed in inner-city neighbourhoods that they experienced as unsafe.



The findings outlined above provide important insights into how gender, race, and citizenship intersect to shape vulnerability to homelessness and housing precarity. Census data from 2021 suggests that more than a quarter (26.35%) of female lone-parent families in British Columbia experience core housing needs (HART, 2024). Furthermore, HART estimates that there is a shortage of 154,250 rental housing units in British Columbia, based on the number of renter households in core housing need (HART, 2024). The number of women who have experienced gender-based violence and face core housing need is not measured, but research by BCSTH suggests that transition and second-stage housing across the province is at capacity. Furthermore, a backlog is created because women often struggle to find affordable and suitable long-term housing in their home communities (Knowles et al., 2019). The numbers support these experiences; in 2017 the BC Rental Housing Coalition estimated that an additional 80,000 units of rental housing were needed to fix the backlog (BC Rental Housing Coalition, 2017BC Rental Housing Coalition, 2017BC Rental Housing Coalition, 2017BC Rental Housing Coalition, 2017BC Rental Housing Coalition, 2017).

Thus far, two related systemic issues have been identified that work against women who have experienced gender-based violence in their search for housing. The first issue is that the application process does not provide families with the flexibility they need to identify the number of bedrooms they require to be safely and stably housed. The second related issue is a supply issue. Simply put, there is not enough social affordable housing to accommodate women and their families. These two issues are interwoven as the lack of supply forces families to move into precarious housing where they face challenges with both affordability and suitability. Building more subsidized and social affordable housing units is part of the solution. The Build BC: Women's Transition Housing Fund is an investment of \$735 million dollars starting in 2019 to build 1,500 additional spaces for women and children fleeing domestic violence (BC Housing, 2021). However, until these units are built, women and their families will continue to be precariously housed. Furthermore, a backlog of need means that many of these spaces are already spoken for (BC Rental Housing Coalition, 2017). In the interim rent supplements could provide families with the safety and stability they need and allow them to remain in their homes and chosen communities. BC implemented a rental assistance program (RAP) in 2006 and expanded family's eligibility for the program in 2018 and again in 2025, however the average monthly supplement of \$472 (Byers & Rao, 2018) still falls well below the provincial average rental rates (Bourassa-Ochoa et al., 2024). Providing a basic income is another approach that would help lift hundreds of families out of poverty across the province (Cameron & Tedds, 2021).

A second part of the solution to the homelessness and housing precarity that women who have experienced gender-based violence face, is to create policies that prioritize the safety and security of families over housing 'suitability.' The City of Toronto's Occupancy Standards are an example of an alternative policy that provides families with the flexibility they need to identify housing that works for them. These occupancy standards are based on two persons per bedroom maximums, but are not prescriptive about who can share a bedroom based on gender or age (Toronto Shelter Support & Housing Administration, 2016). For example, these standards allow a parent and child to share a bedroom if they so choose to. They also allow three children under the age of eighteen to share a bedroom in units with more than three bedrooms "if the shared bedroom provides the minimum space required under the City's Municipal Code Property Standards" (Toronto Shelter Support & Housing Administration, 2016). This gives single-parent and larger families the flexibility they may need to find safe and secure housing.

It should be noted that two persons per bedroom maximums have also been criticized as discriminatory. Tim Iglesias (Iglesias, 2012) provides a fascinating history of the two-person per bedroom maximum that is widely used by the Department of Housing and Urban Development (HUD) in the US, and its disparate impact across racial lines. Iglesias argues that a unit's *space and configuration* need to be considered when measuring housing suitability (Iglesias, 2012). This aligns with culturally-appropriate housing (CAH) principles where the focus is on dwelling and amenity design, and individuals and communities have the ability to identify which spaces work for them and how (McCartney et al., 2021; Rachelson et al., 2018). The reality is that not all housing is built equally, and in some cases a "bedroom" may easily accommodate three children, while in another case it may barely accommodate a single person. In the Canadian context, McCandless (McCandless, 2020, p. 94) points out that rather than there being direct links between occupancy standards and health and safety, they play an important role in trying to protect a specific "culturally constructed definition of moral health, safety, comfort and convenience." This highlights the normative element of NOS and their role in prescribing how families should use space, rather than recognizing the role that culture plays in shaping how spaces are used (Gray, 2001; Harwood & Myers, 2002; Lauster & Tester, 2010). It also points to the role that NOS play as a tool for surveillance that often disproportionately impacts BIPOC families and contributes to their housing precarity and separation (Christensen, 2016; Native Women's Association of Canada, 2021).

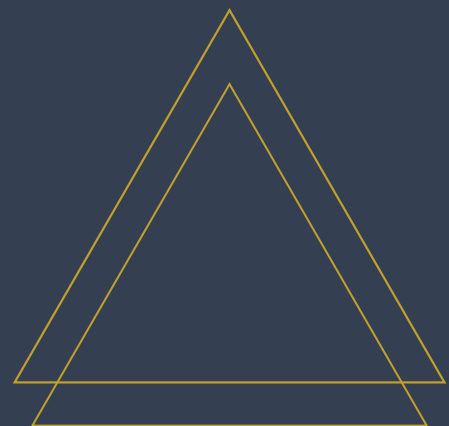


Recommendations

All levels of government play a crucial role in addressing structural inequities by tackling broader social issues, such as the gender wage gap, through targeted support programs. These should extend to women experiencing violence. Achieving systemic change requires evidence-based policy efforts at grassroots, municipal, provincial, and federal levels. Additionally, adopting frameworks like Gender-Based Analysis Plus (GBA+) ensures that policies and programs reflect the intersecting realities of affected communities. Furthermore, government investment is essential in prioritizing funding and policy support for the construction and maintenance of housing that meets the diverse needs of vulnerable populations. The policy implications of this research are broken down by each level of government below:

Federal recommendations

The federal government must take decisive action to improve housing stability and prevent violence against women and gender-diverse individuals by implementing targeted economic supports, sustained funding, and policy reforms. Increasing social assistance rates and programs that promote women's financial independence are critical to housing security. Stable, long-term financial commitments are needed to expand outreach services, rental assistance, and operational funding for anti-violence programs. Strengthening cross-sector collaboration—integrating housing, healthcare, child protection, and social development—will bridge existing service gaps. Additionally, data collection on women's housing insecurity and violence is essential to inform evidence-based policies. Addressing the housing crisis requires scaling up funding for both short- and long-term housing solutions, while also regulating the financialization of rental housing to protect affordability. Government accountability in non-market housing expansion must include transparent reporting on new unit creation and policy effectiveness. Targeted financial supports should be expanded, particularly for families raising children with disabilities and complex medical needs. Further, governments must engage stakeholders to establish alternative housing criteria that reflect the diverse needs of women, BIPOC communities, and gender-diverse individuals. With the affordability crisis fueling child poverty, strengthening federal benefits like the Canada Child Benefit and Child Disability Benefit is crucial to lifting families out of core housing need.



Key Recommendations:

- Increase social assistance rates and financial programs for women's independence.
- Secure long-term funding for housing and violence prevention services.
- Strengthen collaboration across housing, healthcare, and social sectors.
- Enhance data collection on women's housing insecurity and violence.
- Expand funding for short- and long-term housing solutions.
- Regulate rental housing financialization to protect affordability.
- Ensure government accountability in expanding non-market housing.
- Provide targeted financial support for families with children with disabilities.
- Develop alternative housing criteria to prevent discrimination.
- Increase federal benefits to reduce child poverty and improve housing stability.



Provincial recommendations

The BC government must take immediate action to expand access to safe, affordable, and appropriate housing for women, children, and marginalized families, particularly those fleeing violence. Addressing the housing crisis requires a multifaceted approach that includes increasing the supply of social and private housing, diversifying housing models, and supporting innovative community projects. Ensuring adequate funding for frontline staff and services is essential in helping survivors navigate housing barriers. NOS should be revisited and replaced with flexible, rights-based guidelines that prioritize family needs and children's safety. To protect tenants from discrimination, the BC Human Rights Code must explicitly include children as a protected group. Furthermore, rent control should be linked to units rather than tenants to prevent exploitative evictions, and eviction prevention measures must be strengthened. Federal and provincial coordination is necessary to standardize access to non-market housing, ensuring fair and transparent placement processes. Social housing providers should prioritize family autonomy, implementing a self-assessment allowing families to determine suitable living arrangements without rigid occupancy restrictions. Housing policies must align with Canada's National Housing Strategy Act (National Housing Strategy Act, 2019), recognizing adequate housing as a fundamental human right. Indigenous governments and organizations should be actively engaged in shaping policies to reflect the unique housing needs of Indigenous families.

Key Recommendations:

- Expand safe and social affordable housing, particularly for survivors of violence.
- Diversify housing models, including second- and third-stage supportive housing.
- Fund community-led initiatives and increase support for frontline housing staff.
- Reform NOS to prioritize safety and family needs.
- Strengthen protections against tenancy discrimination under the BC Human Rights Code.
- Link rent control to units, preventing displacement through evictions.
- Increase shelter allowances and income assistance rates.
- Standardize access to non-market housing through a coordinated data system.
- Allow flexibility in social housing placement to accommodate extended families.
- Ensure alignment with Canada's National Housing Strategy Act (2019).
- Actively involve Indigenous governments in shaping housing policies.

Municipal Recommendations

[Family-Friendly Housing Policies](#) should be adopted, requiring a minimum percentage of two- and three-bedroom units in new developments to meet the needs of households with children, based on local housing assessments. Local governments can also create advisory design guidelines for family-friendly or women-centred housing to ensure that suitability and livability are incorporated in the design stage. BCSTH's [Women Centred Design Tool Kit](#) provides a good example of the types of considerations that need to be made for designing family-friendly and women-centred housing. To strengthen tenant protections, municipalities should implement a landlord registration system modeled after Scotland's, with periodic renewals and potential denials for landlords who violate tenancy laws or engage in discrimination. Additionally, municipal bylaws should be developed to include educational requirements for property managers, ensuring ethical and legal accountability for private landlords.



Recommendations for Service Providers

Service providers play a crucial role in ensuring equitable housing access and must actively combat discrimination through education and training for housing managers, landlords, and front-line staff. This is particularly vital for marginalized groups, including Indigenous women, immigrant and refugee women, women with disabilities, racialized women, and LGBTQIA+ individuals, who often face systemic barriers. Social workers and front-line service providers hold significant discretionary power in housing decisions, and evidence shows that BIPOC communities frequently encounter bias in this process. To address these disparities, policies should be designed and implemented with an intersectional lens, recognizing the complex ways in which gender, race, and disability influence housing access. By fostering awareness, accountability, and inclusive practices, service providers can create a more just and equitable housing system for all.

Key Recommendations:

- Identify propriety population through a survey of the wider community and service uses that can be used to inform priority placement programs.
- Implement a self-assessment that allows women to identify their housing needs.
- Build connections with private landlords to increase options for women and children fleeing violence.



Conclusion

The NOS were originally designed to inform social affordable housing investments and guide the transfer of responsibilities from the federal government to the provinces. However, as this study has demonstrated, NOS has evolved into a significant barrier to housing for women and children fleeing violence. Rather than facilitating access to safe and stable housing, NOS has contributed to prolonged periods of housing precarity, exacerbating the vulnerability of families already at risk. The rigid application of these standards has constrained women's choices, forcing them to wait for housing that meets prescribed suitability criteria rather than allowing them to secure housing that best fits their needs.

This rigidity has had particularly detrimental effects on marginalized groups, disproportionately impacting women from BIPOC communities. Language barriers, lack of transparency in waitlist processes, and restrictive criteria have further marginalized these women, often placing them in unsafe living conditions. The research underscores that NOS does not adequately reflect the diverse cultural and familial realities of those in need, reinforcing systemic inequities in housing accessibility.

Addressing these challenges requires a fundamental shift in housing policy to ensure the right to housing is truly realized for all. One immediate solution is increasing the supply of affordable and subsidized housing, as initiatives like the Build BC: Women's Transition Housing Fund indicate. However, given the urgent nature of housing precarity, interim measures such as increased rent supplements or the implementation of basic income programs must also be explored to provide immediate relief.

In addition, alternative occupancy standards must be considered. The City of Toronto's flexible approach to occupancy standards provides a promising model that prioritizes safety and stability over rigid suitability metrics. A shift toward culturally appropriate housing frameworks, where individuals and communities have the autonomy to determine their housing needs, is also critical. Such an approach acknowledges that housing suitability is not a one-size-fits-all concept and must be tailored to reflect diverse family structures and cultural practices.

Ultimately, recognizing housing as a human right means ensuring that policies do not inadvertently exclude or disadvantage those most in need. Reforming NOS to prioritize flexibility, transparency, and cultural appropriateness is a necessary step in achieving equitable housing access. By centering the experiences of women and children fleeing violence, policymakers can dismantle barriers and create a housing system that truly upholds the right to safe, adequate, and affordable housing for all.

References

- Allen, W. S. (2020). Learning to become white girls in a settler colonial context: exploring the racial socialization of white Euro-Canadian women. *Settler Colonial Studies*, 10(3), 378–402. <https://doi.org/10.1080/2201473X.2020.1771976>
- Ashlie, K. (2022). *Finding a Better Fit: Rethinking Occupancy Standards for British Columbia*.
- BC Housing. (2021). *Women's Transition Housing Fund Program - Program and Proposal Process*. <https://www.bchousing.org/projects-partners/Building-BC/WTHF>
- BC Rental Housing Coalition. (2017). *An Affordable Housing Plan for BC*. 24. http://bcnpha.ca/wp_bcnpha/wp-content/uploads/2017/04/BC_Affordable_Housing_Plan.pdf
- Bill McKnight. (1990). *A National Direction for Housing Solutions*.
- Bourassa-Ochoa, T., Laberge, M., Hughes, K., & ab Iorwerth, A. (2024). *Fall 2024 Rental Market Report*. CMHC. <https://www.cmhc-schl.gc.ca/professionals/housing-markets-data-and-research/market-reports/rental-market-reports-major-centres>
- Byers, L., & Rao, R. (2018). *Families and seniors receive more help to pay rent*. BC Gov News. <https://news.gov.bc.ca/releases/2018MAH0111-001668>
- Cameron, A., & Tedds, L. (2021). Gender-Based Violence , Economic Security , and the Potential of Basic Income : A Discussion Paper. *Munich Personal RePEc Archive*, 107478. <https://mpa.ub.uni-muenchen.de/107478/>
- Canadian Housing and Mortgage Corporation. (2025, March 11). *Core housing need and gender*. The Housing Observer. <https://www.cmhc-schl.gc.ca/blog/2025/core-housing-need-gender>
- Canadian Housing Need*, 1991. (1991).
- Canadian Mortgage and Housing Corporation. (2022, April 20). *Household characteristics data*. Core Housing Need: Incidence (%) and Number of Households in Core Housing Need 2012-2022. <https://www.cmhc-schl.gc.ca/professionals/housing-markets-data-and-research/housing-data/data-tables/household-characteristics>
- Christensen, J. (2016). Indigenous housing and health in the Canadian North: Revisiting cultural safety. *Health & Place*, 40, 83–90. <https://doi.org/10.1016/j.healthplace.2016.05.003>
- CMHC. (2020). *Characteristics of Households in Core Housing Need: Canda, P/T, CMAs*. Excel-Publication.
- CMHC-SCHL. (2017). *Primary Rental Market Statistics - British Columbia*. <https://www03.cmhc-schl.gc.ca/hmip-pimh/en#Profile/59/2/British Columbia>
- Farha, L. (2020). *"Housing , the front line defence against the COVID-19 outbreak ,"* says UN expert (Issue March). <https://www.ohchr.org/EN/NewsEvents/Pages/DisplayNews.aspx?NewsID=25727&LangID=E>

Ferguson, J. M. (2019). *Me, myself, they: life beyond the binary*. Anansi.

first call. (2023). *A Failure to Protect: The Denial of Children's Right to Housing in British Columbia*.

Goeman, M. (2013). "Remember what You Are": Gendering Citizenship, the Indian Act, and (Re)mapping the Settler Nation-State. In *Mark My Words: Native Women Mapping Our Nations*. University of Minnesota Press.

Goodyear, R. K. (Rosemary K., Fabian, Angela., Hay, J. (Jane), & New Zealand. Statistics New Zealand. (2012). *Finding the crowding index that works best for New Zealand : applying different crowding indexes to census of population and dwellings data for 1986-2006* (Issue 11).

Granzow, K. (2020). *Invested Indifference: How Violence Persists in Settler Colonial Society*. UBC Press.

Gray, A. (2001). *Definitions of crowding and the effects of crowding on health : A Literature review prepared for the Ministry of Social Policy*.

HART. (2024). *Housing Assessment Resource Tools (HART)*. Housing Needs Assessment Tool . <https://hart.ubc.ca/housing-needs-assessment-tool/>

Harwood, S., & Myers, D. (2002). The dynamics of immigration and local governance in Santa Ana: Neighborhood activism, overcrowding, and land-use policy. *Policy Studies Journal*, 30(1), 70–91. <https://doi.org/10.1111/j.1541-0072.2002.tb02130.x>

Hiebert, D., D'Addario, S., Sherrell, K., & Chan, S. (2005). The profile of absolute and relative homelessness among immigrants, refugees, and refugee claimants in the GVRD. *Mosaic*, May. <https://www.mosaicbc.org/wp-content/uploads/2017/01/The-Profile-of-Absolute-and-Relative-Homelessness.pdf>

Holmes, C., Hunt, S., & Piedalue, A. (2015). Violence, colonialism, and space: Towards a decolonizing dialogue. *Acme*, 14(2), 539–570. <https://doi.org/10.14288/1.0340266>

Hulchanski, D., & Shapcott, M. (2004). *Finding Room : Policy Options for a Canadian Rental Housing Strategy*. Centre for Urban and Community Studies, University of Toronto.

Iglesias, T. (2012). Moving Beyond Two-Persons-Per-Bedroom: Revitalizing Application of the Federal Fair Housing Act to Private Residential Occupancy Standards. *Gorgia State University Law Review*, 28(3). <https://doi.org/10.2139/ssrn.1792849>

Kahan, D., Lamanna, D., Rajakulendran, T., Noble, A., & Stergiopoulos, V. (2020). Implementing a trauma-informed intervention for homeless female survivors of gender-based violence: Lessons learned in a large Canadian urban centre. *Health and Social Care in the Community*, 28(3), 823–832. <https://doi.org/10.1111/hsc.12913>

Knowles, T., FitzGerald, A., Bowman, N., Sekhon, S., & Sagert, E. (2019). *Getting Home Project: Overcoming Barriers to Housing after Violence Community Needs Assessment Report* (Issue March).

Lauster, N., & Tester, F. (2010). Culture as a problem in linking material inequality to health: on residential crowding in the Arctic. *Health & Place*, 16(3), 523–530. <https://doi.org/10.1016/j.healthplace.2009.12.010>

McCandless, E. (2020). *Cracks in the foundation? Examining the justifications for and unintended consequences of residential occupancy standards in Canada* (Vol. 21, Issue 1). <http://mpoc.org.my/malaysian-palm-oil-industry/>

McCartney, S., Herskovits, J., & Hintelmann, L. (2021). Developing occupant-based understandings of crowding: a study of residential self-assessment in Eabametoong First Nation. *Journal of Housing and the Built Environment*, 36(2), 645–662. <https://doi.org/10.1007/s10901-020-09768-y>

McCloskey, L. A. (2016). The effects of gender-based violence on women's unwanted pregnancy and abortion. *Yale Journal of Biology and Medicine*, 89(2), 153–159.

Michael H. Wilson. (1984). *Economic and Fiscal Statement*.

Million, D. (2013). Gendered Racialized Sexuality. In *Therapeutic Nations: Healing in an Age of Indigenous Human Rights*. University of Arizona Press.

Miraftab, F. (2000). Sheltering refugees: The housing experience of refugees in Metropolitan Vancouver, Canada. *Canadian Journal of Urban Research*, 9(1), 42–63.

National Housing Strategy Act, ReVision (2019). <https://laws-lois.justice.gc.ca/eng/acts/N-11.2/>

Native Women's Association of Canada. (2019). *Indigenous Housing : Policy and Engagement Final Report to Indigenous Services Canada* (Issue 613). <https://www.cmhc-schl.gc.ca/en/Developing-and-Renovating/Develop-New-Affordable->

Native Women's Association of Canada. (2021). *The Role of Housing in Child Protective Services Research Report*.

New Zealand Government. (2018). *Living in a crowded house: Exploring the ethnicity and well-being of people in crowded households*. www.stats.govt.nz

Office of the United Nations High Commissioner for Human Rights. (2014). *The Right to Adequate Housing* (Vol. 21, Issue 21).

Oudshoorn, A., Benbow, S., Esses, V., Baker, L., Annor, B., Coplan, I., Shantz, J., & Ezukuse, V. (2020). Homelessness Prevention for Refugees : Results From an Analysis of Pathways to Shelter. *European Journal of Homelessness*, 14(2), 263–280.

Parker, B., & Leviten-reid, C. (2021). Pandemic precarity and everyday disparity : gendered housing needs in North America Pandemic precarity and everyday disparity : gendered housing needs in North America. *Housing and Society*, 00(00), 1–28. <https://doi.org/10.1080/08882746.2021.1922044>

Phillips, R. (2009). Settler colonialism and the nuclear family. *Canadian Geographer*, 53(2), 239–253. <https://doi.org/10.1111/j.1541-0064.2009.00256.x>

Rachelson, H., Wong, J., & Han, E. (2018). *An Exploration of Approaches to Advance Culturally-Appropriate Housing in Canada About This Report*. April.

Schwan, K., & Ali, N. (2021). *A Rights-Based , GBA + Analysis of the National Housing Strategy A Rights-Based , GBA + Analysis of the National*.

Sherrell, K. M. (2011). *Finding a Home: The Housing Experiences of Government Assisted Refugees and Refugee Claimants in Winnipeg and Vancouver* (Issue September). <http://hdl.handle.net/2429/37734>

The National Inquiry into Missing and Murdered Indigenous Women and Girls. (2019). *Reclaiming Power and Place: The Final Report of the National Inquiry into Missing and Murdered Indigenous Women and Girls* (Vol. 1).

The National Right to Housing Network. (2019). *Right to Housing Legislation in Canada*. <https://housingrights.ca/right-to-housing-legislation-in-canada/>

Toronto Shelter Support & Housing Administration. (2016). *Chapter 4: Occupancy Standards* (Issue July).

Wind, R., Vols, M., & Roorda, B. (2023). The Child-specific Right to Adequate Housing in the Convention on the Rights of the Child. *International Journal of Children's Rights*, 31(2), 444–470. <https://doi.org/10.1163/15718182-31020001>

Young, I. M. (1997). *Intersecting Voices: Dilemmas of Gender, Political Philosophy and Policy*. Princeton University Press.



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