



CUPE



Canadian Union of Public Employees

Submission to the National Housing Council on the
Lack of Accessible Housing in Canada

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Introduction

The Canadian Union of Public Employees (CUPE) is Canada's largest union. We represent more than 800,000 members in 11 sectors across the country, including but not limited to, health care, social services, municipal workers, emergency, security services, and education. This includes workers and their families who need or rely on accessible homes, and members and retirees living with and/or supporting loved ones with a disability. CUPE also represents workers who deliver support services, facilitate home construction, and administer vital programs across the country.

1. Our Vision

We firmly believe in the right to housing and the elimination of all barriers, be they physical, social, or economic. We support the creation of housing that is physically accessible at scale. We also believe in a comprehensive social safety net, with the wrap-around support and public services our communities need to thrive.

This includes, but is not limited to:

- income support programs that guarantee a comfortable standard of living;
- head-to-toe public health care coverage;
- widely available and publicly owned rent-geared-to-income (RGI) housing; and
- inclusive and effective support services that uphold the dignity of all who use them.

CUPE supports an intersectional approach to combating injustice. In addition to the above, we know and understand that specific, targeted measures are needed to support equity-deserving groups – particularly those facing barriers related to multiple parts of their identity.

We believe the fight for disability and housing justice must also account for the unique and overlapping needs of individuals who are marginalized because of their racial, ethnic or religious background, age, gender, sex, sexual orientation, migration status, and so on.

The right to housing is not just a slogan; it is a legal right rooted in the *National Housing Strategy Act* of 2019 and the International Covenant on Economic, Social and Cultural Rights (ICESCR) – legal frameworks which informed [a landmark court ruling expanding charter protections for homelessness in May 2026](#).¹ It is also reinforced by the federal government's obligations under the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP), the Truth and Reconciliation Commission's Calls to Action, and the National Inquiry into Missing and Murdered Indigenous Women and Girls' Calls for Justice – which call for safe, accessible, adequately funded, culturally appropriate housing and public infrastructure. Governments at all levels must act to fulfill these rights and obligations.

¹ National Right to Housing Network (May 22, 2026). *Press Release: Landmark Court Decision Could Change Everything for How Canada Addresses Homelessness*.

2. Systemic Gaps and Barriers

Affordability and Support Access

Many people with disabilities are living in legislated poverty. [Some examples of what single adults receive across the provinces, per month:](#)²

- \$907 on the Extended Benefits Program – New Brunswick (low end)
- \$1,166 from Manitoba Supports for Persons with Disabilities (mid-range)
- \$1,863 on Assured Income for the Severely Handicapped (AISH) – Alberta (high end)

Disability and social assistance programs like these are deeply inadequate, particularly given the unique and additional expenses people may face as a result of their conditions. Likewise, many federal supports are insufficient and needlessly restrictive:

- The Canada Disability Benefit (CDB) provides just \$200 per month. It is subject to provincial clawbacks and is gatekept behind a Disability Tax Credit (DTC) certificate.
- The Canada Housing Benefit (CHB) is delivered bilaterally, allowing provinces and territories to impose their own restrictions; Saskatchewan disqualifies social assistance recipients from accessing it altogether.

Our country has a dire lack of rent controls. While most provinces limit rent increases for occupied units, only PEI and Manitoba cap how much landlords can raise the rent for a unit between tenants. The rental market is dominated by for-profit landlords with an incentive to maximize profits. Most renters can't find public or non-profit housing, leaving them stuck with these so-called "market conditions."

- The national average rent for vacant units is [\\$2,027 at time of writing](#).³
- Social housing accounts for [just 3.5% of Canada's total housing supply](#).⁴
- This is half the Organization for Economic Co-operation and Development (OECD) average, [where it accounts for 7% of housing](#).⁵

Applications for income supports, public housing, and accommodation are often difficult, invasive, and time-consuming. Requirements may also compound existing challenges. For example:

- DTC certifications require access to medical providers, yet [nearly one in five adults don't have access to a regular care provider](#).⁶
- Income verification – requiring detailed tax returns or financial records that someone may not have or be able to access.
- Caseworker support – can be lost when switching from provincial to federal programs, forcing people to navigate processes on their own; automated/online processes may create extra barriers for those without tech skills or access to the internet.

² Disability Without Poverty (accessed June 2, 2026). *CDB Clawback Map of Canada*.

³ Rentals.ca (May 2026). *National Rent Report*.

⁴ Rebekah Young with Scotiabank (Jan 18, 2023). *Canadian Housing Affordability Hurts*.

⁵ OECD (accessed June 2, 2026). *OECD Affordable Housing Database*.

⁶ CIHI (Oct 23, 2025). *Most Canadians have a regular health care provider*.

For individuals here on a temporary resident permit, support is even more limited. International students, for instance, are subject to the same cost-of-living pressures and spiraling rents as everyone else, but they have constraints on the number of hours they can work and the income support programs they can access (some require permanent residency or citizenship).

Housing Availability

Physical, social, and economic barriers persist across the “housing continuum”. These include, but are not limited to, issues around oversight and accountability for service providers, government funding, prioritizing industry over vulnerable community members, legislative gaps, and so on.

Emergency shelters may not have ramps or space to accommodate clients with mobility aids. They may (illegally) turn away individuals with service animals or medical devices, such as oxygen tanks, under the guise of “liability”. Shelters are often run by a network of non-profit providers that operate with minimal resources, leading to inconsistent policies, guidelines, training, and staff competencies. This could be addressed through increased funding and government oversight, coordination of service providers, or minimum/standard requirements written into service contracts.

Government programs and funding strategies may rely on flawed metrics or definitions of homelessness, affecting how resources are allocated. The federal government’s Reaching Home program, for example, relied on shelter access data to define and assess rates of homelessness. It is likely this would underrepresent women and gender-diverse people, who often experience homelessness in less visible and more sporadic ways. This could be addressed by improved data collection strategies and metrics used to inform program funding.

Assessments used to connect people with appropriate housing and supports are sometimes flawed, relying on the interpretation of service providers. For example, studies show the Service Prioritization Decision Assistance Tool (SPDAT) – used to assess client needs and vulnerability throughout much of Canada and the US – [replicates systemic bias against Black populations](#).⁷ [Many of its scoring criteria are subjective or driven by self-reporting](#).⁸ For people with invisible disabilities, this could lead to inconsistent and drastically different scores, affecting how they are matched or triaged for support. Issues like these could be addressed through greater training for service providers (e.g., around bias, trauma, and cultural competency) and revised assessment tools.

Where public social housing is theoretically available, waitlists can stretch for ages – [nearly six years in Montreal and 14 years in Toronto for a one-bedroom](#).⁹ Physically accessible units are even more scarce – [with only 9% of subsidized public homes meeting the criteria in 2020](#).¹⁰ This could be addressed through substantial and increased investment by all levels of government in public, non-profit, and co-op housing, and by the expansion of rental acquisition funds, which allow public and non-profit entities to purchase residential properties going up for sale. The federal government should work to create 50,000 new rent-geared-to-income social housing

⁷ Courtney Cronley with Homeless Hub (Jan 21, 2021). *Racial and Gender Bias in the VI-SPDAT*.

⁸ OrgCode via City of Hamilton website (2020). *Service Prioritization Decision Assistance Tool (SPDAT): Single Adults SPDAT Workbook*.

⁹ Mary Vallis in CBC News (Jul 15, 2023). *How long do Canadians in need have to wait for affordable housing? Depends on where they live*.

¹⁰ Canadian Human Rights Commission (accessed June 2, 2026). *Accessibility - Monitoring the right to housing for people with disabilities*.

units per year for ten years, targeting support toward those experiencing core housing need and/or homelessness.

Some jurisdictions have imposed additional constraints. Ontario downloaded social housing to its municipalities in 2001, saddling municipal governments with significant debt, alongside increasing capital and operating costs needed to maintain, upkeep, and operate their public homes. [Eighty-seven percent of Ontario municipalities have less than 30,000 people](#).¹¹ Without provincial and federal leadership, it is not feasible for most of them to expand social housing in a meaningful way. This could be addressed by providing municipalities with the core funding needed to maintain and expand their supply.

Recent federal initiatives have pushed “affordable rent” using metrics and strategies agreed upon with industry partners – but their benchmarks are often out of step with reality for low and middle-income households. In 2021, for example, [they announced a \\$16 million preferential loan for an “affordable” housing complex in Moncton, where the average rent was almost twice that of the surrounding area](#).¹² They managed that by defining “affordable” according to area median income – which does not differentiate between owner and renter households. Today, the Carney government’s Build Canada Homes initiative [has adopted definitions that are income-based](#), but it does not make this distinction either.¹³ We believe government programs should adopt a standard definition of affordability, particularly where public funds are being allocated – one that is income-based and differentiates renters from homeowners.

Historically, the federal government has over-relied on the initiative and goodwill of private developers and for-profit landlords. The current government appears to be taking an even less ambitious approach, with [planned spending on housing programs slated to drop 56% by 2028-29](#).¹⁴ This includes [expired funding for the Canada Housing Benefit](#), which assists low-income renters, and cuts impacting the Canada Mortgage and Housing Corporation’s (CMHC) ability to maintain existing social housing.¹⁵ At the same time, Build Canada Homes (their flagship initiative) [is expected to create just 26,000 homes](#), with half of them being “affordable”.¹⁶ Programs like the Canada Housing Benefit provide effective and immediate relief, and they are an important stop-gap as our country works to increase its supply of social housing. We believe the government should maintain, if not expand, funding for critical programs like these.

“Market-rate” homes often lack accessibility features, owing to the age of the housing stock and the lack of universal design requirements between provinces. Our communities can build new homes with better design standards, but some jurisdictions exempt new builds from rent-control requirements. Annual rent increases [are not capped in Manitoba for 20 years after construction](#).¹⁷ [Ontario exempts units built after 2018 from annual increase limits altogether](#).¹⁸ This can force a choice between a home that’s accessible and a home that’s affordable.

¹¹ Rural Ontario Institute (Sep 2022). *Rural Ontario Facts: Population Factsheet*.

¹² Richard Cuthbertson and Shaina Luck in CBC News (Sep 15, 2021). *Ottawa is lending billions to developers. The result: \$1,500 ‘affordable’ rents*.

¹³ Housing, Infrastructure and Communities Canada (Apr 9, 2026). *Build Canada Homes – Housing affordability by income level*.

¹⁴ Ben Segel-Brown with the Office of the Parliamentary Budget Officer (PBO) (Dec 2, 2025). *Build Canada Homes and the Outlook for Housing Programs under Budget 2025*.

¹⁵ Ibid.

¹⁶ Ibid.

¹⁷ Government of Manitoba (May 31, 2026). *The Residential Tenancies Act*.

¹⁸ Government of Ontario (Oct 27, 2025). *Residential rent increases*.

CUPE supports the widespread adoption of universal design, but it must be coupled with improved rent controls.

The right to housing is limited by a general lack of oversight for private landlords, and accountability mechanisms that are reactive rather than proactive (e.g., tribunal filings). This allows for pervasive and illegal discrimination during the housing search process, with landlords refusing prospective tenants on disability or social assistance or denying them based on other protected identity grounds. It also allows landlords to shirk their duty to accommodate existing tenants, who may acquire a disability during their tenure – e.g., by refusing to accept or install home retrofits, or by forcing the tenant to assume the cost. These issues could be addressed by increasing resources for tenant legal aid or through the creation of renter unions.

People with disabilities can be disproportionately affected by profit-maximizing strategies, even when the landlord's behaviour is legal (e.g., staff cuts or deferred maintenance). These problems are magnified when they involve financialized landlords, like real estate investment trusts (REITs) or pension funds. [Financialized landlords are ruthless in pursuit of profits, even compared to other types of investor landlords.](#)¹⁹ We have seen this acutely in long-term care and supportive living facilities, [where financialized entities cut staff, suppress the amount and quality of care available](#), and create worse health outcomes for residents.²⁰ It was estimated that in 2020, [financialized landlords owned 33% of seniors' housing in Canada, including 22% of long-term care beds.](#)²¹ CUPE believes the growth and consolidation of housing under financialized landlords is a threat to housing rights. At a minimum, we suggest eliminating preferential tax treatment for REITs, reinvesting the money into publicly owned social housing, and introducing new regulations and restrictions for large-scale investors in residential real estate.

Beyond oversight and transparency, other gaps in legislation can disproportionately affect those with disabilities. For example:

- Multiple provinces do not have maximum temperature requirements – extreme heat disproportionately impacts people with conditions and medications limiting heat tolerance and body temperature regulation.
- Ontario [does not require large multi-unit residential buildings to have backup power generators](#) – severe power outages may leave people with reduced mobility trapped in their apartments, without access to working elevators.²²

Importantly, barriers also persist for homeowners. There are multiple provincial and federal programs available to homeowners for retrofitting their homes with accessibility upgrades, but these are often income-tested, require tax filing, or involve prohibitive upfront costs. The federal [Home Accessibility Tax Credit, for instance, allows homeowners to claim up to \\$20,000](#), but is non-refundable and may not benefit those who already receive tax refunds or those who cannot afford the upfront cost of renovations.²³ Depending on the type and location of someone's

¹⁹ Robert Morrissey et al (Oct 2023). *Financialization of Housing: Report of the Standing Committee on Human Resources, Skills and Social Development and the Status of Persons with Disabilities*, p. 51 – 61.

²⁰ Jackie Brown with the Office of the Federal Housing Advocate (Jun 2022). *The Financialization of Seniors' Housing in Canada*.

²¹ Ibid.

²² Chandra Pasma (accessed Jun 2, 2026). *Bill 47, Protecting Human Rights in an Emergency Act (Emergency Power Generators)*, 2023.

²³ Government of Canada (Jan 20, 2026). *Personal income tax: home accessibility expenses*.

home, they may also face challenges from condo boards or homeowner associations trying to (illegally) restrict their alterations to the property.

Geography and Proximity to Services

Beyond housing that is physically accessible, functional public services and infrastructure are vital for ensuring people can get where they need to go and access the support they need to live safely and comfortably.

Many towns and cities do not have sufficient or reliable coverage for sidewalks, public transit, and snow removal, constraining housing options and/or isolating people who can't drive. Many communities do not have the health care services people need to manage or accommodate their disabilities or that of their loved ones. Students in many communities do not have access to the institutions or educational support needed to complete their education. Women, trans and gender-diverse people who are disproportionately affected by intimate partner violence may be unable to access emergency accommodations or crisis intervention services. Gaps like these can force people to leave their homes or move to a new community altogether – where they may lose existing supports or encounter new barriers in the process.

Labour Perspectives

There are critical intersections between labour and disability/housing rights which should inform government policy. At the individual level, workplace safety, oversight and accountability, stable employment, and flexible work arrangements are vital for preventing injury and supporting workers with a disability. At the systemic level, adequate funding for public services and investment in public employees is critical for providing the supports people need to thrive.

I. Workplace injuries

Many people acquire a disability through workplace injury or occupational hazard exposure. For example, a construction worker could lose motor function after falling from a ladder, a teacher or health care worker may acquire a brain injury from a violent incident with a student or patient, for example. The 2022 Canadian Survey on Disability [found nearly one in four respondents \(age 25 to 64\) cited work-related causes](#) for their condition.²⁴

II. Workplace benefits and job protections

Workers and their families often depend on stable employment for access to health benefits and wage replacements. In many cases, someone's job can help fulfill their housing needs by providing the income support or medical coverage needed to accommodate, manage or rehabilitate their condition. In other cases, someone's job can undermine them, by imposing constraints on where they can go or move for help.

Unions play an important role in safeguarding job security and combatting precarious work. Unions provide the collective power needed to secure living wages, stable employment, health benefits, workplace accommodations, health and safety enforcement and flexible working conditions – these provide a foundation of material support and stability, allowing workers and their families to better meet their needs.

²⁴ Benoît-Paul Hébert et al with Statistics Canada (May 28, 2024). *A demographic, employment and income profile of persons with disabilities aged 15 years and over in Canada, 2022*, text box 4.

III. The importance of public services

Investment in public services and better working conditions is not just good for the people who provide them – it is key to ensuring better outcomes for people who rely on those services. Functional public services are necessary for people to overcome many of the barriers described so far.

- Federal civil servants at the Canada Revenue Agency, Veterans Affairs, and other agencies provide insight, process tax returns and disability claims, and help people apply for supports.
- Maintenance and construction workers are needed to build and maintain accessible and affordable housing at scale.
- Social services workers help provide emergency shelter, they help facilitate access to income supports and appropriate housing.
- Health care workers are needed to facilitate and perform assessments, help people manage conditions, to provide mobility aid, home care, and other functions.
- Municipal and transportation workers are needed to build and maintain sidewalks, clear snow, and drive buses.
- Post-secondary education workers are needed to administer accommodation and support requests for students living in residence at colleges and universities.

Delivering these services in the public sector allows for stable funding. It removes profit motives, so a greater portion of the resources can be invested in the service. When governments coordinate these services, it allows for more consistency between service provider locations – with consistent policy, standards, staff training, and democratic oversight. For example, Ottawa’s ten city-funded shelters operate under the [Ottawa Emergency Shelter Standards](#), which contain robust language and directives for supporting 2SLGBTQ+ clients, including anti-harassment and administrative measures.²⁵

IV. Good social service jobs

Providing service workers with long-term, stable employment enables a better experience and outcomes for service users. In social services, caseworkers can form professional relationships and build trust with their clients. This means clients have someone who understands their needs and experiences – and they don’t have to go through the frustrating, sometimes re-traumatizing experience of explaining their life to someone over and over again.

Investing the resources necessary to give workers manageable caseloads means they can give each client the attention they deserve. Investing in professional development means they can acquire the skills needed to provide support in a better-informed, sensitive manner.

Ensuring service workers are well paid means service providers can recruit staff who are better trained, better qualified, and more equipped to support individuals with complex or intersecting needs. It also means they can more easily attract and retain individuals with niche or specific skills needed to fill service gaps, or lived experience that matches that of their clients.

When governments try to achieve ‘cost savings’ through measures like wage caps (e.g., Ontario Bill 124), and workforce reduction, it leads to overworked and under-resourced staff, burnout, and higher staff turnover. When they try to replace public or client-facing staff with automated services, or replace their insight and expertise with AI tools, it leads to greater frustration, greater hesitance to access supports, and a greater chance for error. Some governments

²⁵ City of Ottawa (Jan 15, 2023). *Ottawa Emergency Shelter Standards*.

appear intent on rolling out systems like these across the public service – despite them being unable or unequipped to deal with the complexity of real people’s situations. We have already seen [two recent cases where AI mistakes in casework led to disastrous consequences](#) – the first rejecting permanent residency applications based on erroneous information, and the second rejecting social assistance applications in Quebec after removing caseworkers from the process.²⁶

3. How Does the Lack of Accessible Housing Affect People?

These systemic gaps come with material consequences, impacting people’s physical, social and economic well-being – fewer resources and employment opportunities, higher stress levels, worse health outcomes, isolation from loved ones and community, increased and cyclical incidents of violence, and more.

These gaps disproportionately affect members of equity-deserving groups, and people may face compounding barriers due to overlapping or intersecting aspects of their identity. We also know these barriers will persist without concrete government action.

- **Poverty:** Roughly [1.5 million people with a disability in Canada lived in poverty](#) as of 2022.²⁷
- **Violence:** [53% of people with disabilities who have experienced homelessness](#) report that violence was a contributing factor to their housing loss;²⁸ in a major study, disabilities were reported [by 79% of women experiencing housing insecurity or homelessness](#);²⁹ and it is estimated that disabled women experience rates of violence two to three times higher than women without disabilities.³⁰
- **Discrimination:** [49% of 2SLGBTQ+ individuals worry about housing discrimination](#),³¹ and they migrate at a much higher rate – roughly [half the trans and non-binary population lives in Canada’s six major urban areas](#), compared to 28% of the general population.³²
- **Core Housing Need:** Indigenous peoples experience disproportionate rates of core housing need, [with 10.8% of Métis, 15.7% of First Nations people living off-reserve, and 36.0% of Inuit living in core housing need, compared to 9.1% of the general population](#).³³

For individuals who failed by ‘the system’, housing precarity and systematically unmet needs can damage their relationships with others, create distrust in leaders and service providers, erode mental health and overall quality of life.

²⁶ Natasha Tusikov and Blayne Haggart in Policy Options (Apr 30, 2026). *The Carney government’s embrace of AI will put lives at risk*.

²⁷ Disability Without Poverty (2024). *2024 Disability Poverty Report Card*.

²⁸ Women’s National Housing and Homelessness Network (Jan 30, 2025). *UN Submission: Gender, the right to housing, and disability rights in Canada*.

²⁹ Ibid.

³⁰ Jihan Abbas with DAWN Canada (Nov 19, 2020). *Rooting Resilience: A Needs Assessment about Women with Disabilities, Gender-Based violence, and the Potential of Peer Support Services*.

³¹ Egale (Jul 2023). *Queering Mental Health Supports in Canada: A Research Report*.

³² Statistics Canada (Apr 27, 2022). *Canada is the first country to provide census data on transgender and non-binary people*.

³³ Statistics Canada (Feb 27, 2026). *Core housing Need among First Nations people living off reserve, Métis and Inuit, 2022*.

For workers who provide services and support to their communities, being unable to help someone because they do not have the capacity, resources, or authority can be demoralizing. Routine exposure to people in crisis without the tools for resolution can lead to burnout, moral injury, and second-hand trauma. CUPE members see and experience these problems on a regular basis – from health care workers treating patients with acute, preventable conditions, and social service workers administering income supports that don't cover the cost of rent, to education staff with mandatory reporting requirements and library workers increasingly forced into becoming emergency responders for people in distress.

4. Recommendations

Affordability

1. Lift people with disabilities out of poverty: increase funding for the Canada Disability Benefit; recipients should have their incomes brought up to at least 30% above the poverty line; exempt the benefit from provincial clawbacks.
2. Make income and other disability supports easier to access: expand eligibility for the Canada Disability Benefit to anyone receiving support from another disability program; streamline the application process.
3. All levels of government should prioritize and expand funding for social housing, including public, co-op and non-profit units. The federal government should work to create 50,000 new rent-geared-to-income social housing units per year for ten years, targeting support toward those experiencing core housing need and/or homelessness; expand the Canada Rental Protection Fund and Tenant Protection Fund.
4. Allocate and increase core funding for the maintenance, renovation, and operation of existing social housing. This should include funding for retrofitting existing stock with accessibility upgrades.
5. Implement real rent controls: provinces should cap annual rent increases, and limit the amount rent can be increased for a unit between tenants; the federal government can work with provinces to implement these changes, tie federal funding to enforceable national standards; make funding to private developers and landlords conditional on them accepting renter-friendly conditions (e.g., affordable rents, no-displacement guarantees).
6. Government programs should adopt a standard definition of affordability, particularly where public funds are being allocated – one that is income-based and which differentiates renters from homeowners.
7. End preferential tax treatment and loopholes for REITs and restrict the ability of financialized landlords to acquire existing affordable homes. Put regulations and restrictions in place for large-scale residential real estate investors (e.g., REITs and pension funds). This could include:
 - increasing capital gains taxes for large-scale investors
 - limiting the amount of units corporate investors can own, or
 - regulating pension funds with residential real estate holdings.
8. Provide grants to help low- and middle-income homeowners afford the upfront cost of accessibility retrofits.

Insight, Oversight, and Accountability

9. Expand funding for research and data collection surrounding housing needs, homelessness, and the disproportionate barriers faced by equity-deserving groups.

10. Governments should develop standards, policies, and guidelines for publicly supported emergency shelters and transitional homes.

11. Expand funding for tenant legal aid and resources for the creation of tenant unions; create a public database of the names and locations of real estate investors and track eviction and homelessness data.

12. Make rental units safer for people with disabilities by legislating maximum temperatures and cooling requirements for landlords, alongside requirements for backup generators and minimum service levels for lighting and elevators.

13. Reject the use of AI for adjudicating applications for or access to housing, income, and employment supports.

Service Gaps

14. Invest in public services and the workers who deliver them to ensure living wages, manageable workloads, stable conditions, and job security – this will improve outcomes and experiences for both staff and service users.

15. Pursue reforms that will increase union density – for example, make forming or joining a union easier by adopting and protecting automatic card-check certification.

16. Invest in quality, public, head-to-toe health care coverage so people can seek the medical care they need – including the preventive care that will prevent complications and increased public costs down the road. This could include, but should not be limited to, a universal single-payer national pharmacare program covering essential medicines, coverage for dental care, eyeglasses, hearing and mobility aids, and mental health practitioners.

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