

Submission to the review panel on the lack of accessible housing in Canada

Submitted July 27 by the Accessibility Commissioner of Canada
Canadian Human Rights Commission

Canadian Human Rights Commission

344 Slater Street, 8th Floor Ottawa, Ontario K1A 1E1

Toll Free: 1-888-214-1090 | **TTY:** 1-888-643-3304

Fax: 613-996-9661 | **Website:** www.chrc-ccdp.gc.ca

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Introduction

This submission is provided by the Accessibility Commissioner in response to a request by the [Review Panel on the Lack of Accessible Housing in Canada](#). The Commissioner thanks the Review Panel for the opportunity to contribute to its hearing and for its work to advance progress on this critical human rights issue.

This review panel hearing comes at a pivotal moment, as governments are planning generational investments in housing. With the establishment of Build Canada Homes (BCH), the renewal of the National Housing Strategy, and the development of a new Indigenous Housing Strategy, there are significant opportunities to build new housing policies and programs on a foundation of accessibility.

Accessible housing is not simply a social policy objective: it is essential public infrastructure and an investment that supports a stronger economy through participation, productivity, and stronger communities.

The Accessible Canada Act (ACA) requires federally regulated organizations subject to the Act to proactively identify, remove, and prevent barriers and to demonstrate measurable progress toward the goal of a barrier-free Canada by 2040. This is both a legal obligation and a sound use of public funds. Getting accessibility right at the outset is almost always less costly than retrofitting barriers later. Accessibility is also about opportunity – inaccessibility leads to long-term costs when people are unable to participate fully in their communities and the Canadian economy.

The Accessible Canada Act reflects a fundamental shift in how we approach accessibility. Success is not measured only by the barriers we remove, but by the barriers we prevent from being created in the first place. Accessibility is therefore not simply an aspirational objective: it is a legal expectation established by Parliament. As governments make generational investments in housing, that principle should guide every decision. Public funds should contribute to creating accessible spaces that everyone can benefit from, not produce more barriers that future generations will be required to remove.

The report and recommendations of this Review Panel present a timely opportunity to clarify Canada's human rights obligations, recommend improvements to federal housing programs and investments, and provide actionable guidance to shape the next National Housing Strategy so that it advances progress toward a barrier-free Canada.

The findings of this Review Panel should inform both future housing policy as well as the accessibility plans and decision-making of federal organizations with responsibilities related to housing. Organizations should be able to demonstrate how they are identifying, removing, and preventing barriers through their housing-related policies, programs, funding decisions, procurement, infrastructure investments, and service delivery.

The Accessibility Commissioner and the Canadian Human Rights Commission

The Accessibility Commissioner is responsible for enforcing compliance with the obligations set out in the ACA for federally regulated organizations under the Commissioner's jurisdiction. The Commissioner carries out this mandate through monitoring and enforcement activities — including the resolution of complaints — as well as through compliance promotion, which includes engaging with federally regulated organizations to help them understand and implement their obligations. The Commissioner also engages with rights holders to ensure their voices are heard in keeping with the spirit of “Nothing Without Us.”

The Accessibility Commissioner is supported by, and is a full-time Commissioner of, the Canadian Human Rights Commission (CHRC), Canada's National Human Rights Institution. The CHRC promotes and protects human rights, including the rights of people with disabilities, and monitors the Government of Canada's implementation of its obligations under the United Nations Convention on the Rights of Persons with Disabilities (CRPD). The evidence presented in this submission draws on the Accessibility Commissioner's mandate under the ACA, as well as the CHRC's broader work advancing the rights of people with disabilities, including its monitoring role under the CRPD.

Understanding accessible housing

Accessibility is not just a checklist or a set of standards. It is about dignity, equity, belonging, and full participation. It is a commitment to ensuring that no one is left behind and a recognition that a strong Canada is one that includes everyone.

Accessible housing is a key component of this inclusion and should be understood broadly. It is about more than ramps, elevators, and door widths. While mobility-related design considerations remain critically important, accessibility in housing must reflect the accessibility needs of the full diversity of disability experiences, including cognitive, sensory, communication, and neurodiversity-related disabilities. Truly accessible housing encompasses the full scope of features, services, technologies, and infrastructure that people require to live independently and with dignity, within their homes and communities.

Accessible housing is part of a broader ecosystem that enables inclusion and participation, and barriers can extend beyond the built environment. Accessible housing should therefore be understood as essential public infrastructure rather than a specialized housing initiative. A person may have an accessible unit but lack access to transportation, employment, attendant supports, or community supports that they need to live independently. In that situation, housing may be technically accessible, but it does not enable full participation, independence, or meaningful connection to the community.

Finally, accessible housing is an issue that affects a great number of Canadians from all backgrounds and income levels. More than one in four people in Canada identify as having a disability. Beyond this, accessibility benefits a much larger portion of the population than is often recognized, including seniors, people with episodic disabilities, individuals recovering from injuries, families with children, and others whose needs may change over time.

Overview of this submission

In order to facilitate the Review Panel's analysis and ensure this submission is useful in assessing government action and inaction on this issue, it is organized into sections that correspond to the Review Panel request. In some instances, the guiding questions for each section have been reframed to better reflect the work of the Accessibility Commissioner and CHRC. Each section includes recommendations for the Review Panel's consideration in formulating its recommendations to the Minister.

Recognizing that the Accessibility Commissioner, the Chief Accessibility Officer and Accessibility Standards Canada have intersecting responsibilities in the areas of accessibility and accessible housing, they have collaborated in the preparation of submissions to the Review Panel.

1. Human rights impacts of government actions, inactions, and systemic barriers

Learning from people directly affected

Meaningful engagement with rights holders is a fundamental principle of a human rights-based approach, encapsulated in the disability rights movement's call for "Nothing Without Us." Engagement with disability communities is integral to the work of the Accessibility Commissioner and the CHRC, ensuring that lived experience informs the Commissioner's understanding of systemic barriers and supports the effective implementation of the Accessible Canada Act.

The information provided in this section is drawn from these engagements, including:

- Public engagements related to Canada's implementation of the CRPD¹
- The development of the Monitoring Framework on the Right to Accessible Housing for People with Disabilities², including key informant interviews (see Section 4 for more details about this work)
- Learning Circles³ conducted during the development of the Monitoring Framework
- The Accessibility Commissioner's meetings with disability communities and civil society organizations

Across engagements held by the CHRC, rights-holders consistently emphasized that housing systems are not meeting their needs, often with serious human rights impacts. The barriers, impacts and outcomes we have heard about are not new. People with disabilities have been advocating for change in these areas for decades.

The consistency of these findings across multiple engagement processes demonstrates that these are not isolated experiences but persistent systemic barriers. Under the Accessible Canada Act, federally regulated organizations are expected to identify, remove, and prevent barriers within the areas for which they are responsible. The persistence of these barriers provides an important context for evaluating whether existing approaches are producing measurable accessibility outcomes.

¹ [Listening and learning | Canadian Human Rights Commission](#)

² [Monitoring the right to housing for people with disabilities | Canadian Human Rights Commission](#). The CHRC worked with the Federal Housing Advocate to develop a framework to monitor the right to adequate housing for people with disabilities. The framework includes outcome indicators based on data collected by Statistics Canada, as well as forthcoming indicators to evaluate governments' policy efforts and resource allocation. See Section 4 for more detailed discussion of the Monitoring Framework and its findings related to outcomes.

³ [What we learned: Housing for people with disabilities | Canadian Human Rights Commission](#)

These findings reinforce that accessibility should be assessed not by commitments or investments alone, but by demonstrable progress in identifying, removing, and preventing barriers. As governments make significant housing investments, it is critical that those investments produce measurable accessibility outcomes for people with disabilities.

Systemic barriers that have been identified and are relevant to the Review Panels' work include the following:

- **Accessible housing shortages:** Rights holders have consistently highlighted challenges related to the limited availability of accessible units, long waitlists, and a lack of options that integrate the supports and services necessary for daily living. Households requiring barrier-free units encounter longer waiting periods for social and affordable housing.
- **Affordability:** This remains a significant barrier, with many individuals unable to secure housing that meets their needs as a result of insufficient income, high housing costs, or a combination of both. Available data, including what was collected under the Monitoring Framework, indicates that people with disabilities generally have lower average incomes, higher rates of low-income, and often bear higher costs of daily living. New housing stock, which is more likely to incorporate accessibility features, is more costly to rent or purchase than older, less accessible housing. For homeowners with disabilities, government subsidies for accessibility retrofits are often not sufficient to bridge the gap between their incomes and the cost of renovations.
- **Barriers to community inclusion:** Rights holders have consistently indicated that accessible housing is often disconnected from the broader supports required for meaningful inclusion. Factors such as location, limited access to transportation, and access to services and community spaces restrict housing options for many people with disabilities who require these supports.
- **Cultural adequacy:** The CHRC understands culturally adequate housing to be housing that supports and fulfills the universal right of all persons to freely and safely express their own cultural identities, maintain their traditions and ways of life, and fully participate in cultural activities of their choosing. In engagements, we have heard that cultural adequacy can be reflected in the building's physical structures and appearance, in the activities that are permitted, and in the proximity and accessibility of cultural and recreational spaces or facilities in the neighbourhood or community. Housing that is both accessible and culturally adequate is extremely rare, reflecting both systemic shortages and lack of attention to this issue in policy and programming decisions.
- **Disproportionate impact:** Gaps in housing are not experienced equally. Data and engagements demonstrate that barriers are particularly pronounced for people with disabilities who are Indigenous, Black, racialized, newcomers, or members of 2SLGBTQIA+ communities. Intersecting experiences of discrimination can shape access to housing in significant ways. For Indigenous peoples with disabilities, for example, barriers may be shaped by colonial approaches to housing and disability that do not reflect cultural practices, collective living, or community needs.

These barriers have consequences. A lack of accessible housing forces some people into homelessness, which may include staying in shelters, outside, or in temporary or unsuitable arrangements due to lack of alternatives. Findings from the Monitoring Framework demonstrate that people with disabilities are

four times more likely to experience homelessness than people without disabilities.⁴ They may also be placed in institutional settings such as long-term care homes when housing that meets their accessibility-related needs is not available.

Meanwhile, accessible housing is often disconnected from the broader supports required for meaningful inclusion. Accessible housing options are frequently disconnected from the supports and services required for people to live independently, which contributes to social isolation, limits participation in community and cultural life, and restricts access to employment, health care, and essential supports.

The persistence of these outcomes suggests that public policy and programming decisions have not produced measurable progress toward identifying, removing, and preventing barriers in housing systems. It also suggests that people with disabilities continue to experience fewer housing choices, longer wait times, and greater barriers to independent living than others. The Accessible Canada Act provides an important opportunity to strengthen accountability for accessibility outcomes. The federal government's spending power, policy responsibilities, and obligations under the Act mean it is well positioned to ensure that housing investments advance accessibility and do not create or perpetuate barriers.

Recommendations for consideration

In light of the Accessibility Commissioner's responsibilities under the Accessible Canada Act, the Review Panel should consider the following recommendations when developing its advice to the Minister:

- Ensure that accessibility is considered from the outset in the design, funding, implementation, and evaluation of all federally supported housing initiatives
- Broaden federal approaches to accessible housing beyond physical design to explicitly include supports, services, income supports, and emerging technologies that enable independent living
- Take steps to increase the supply of accessible and affordable housing by promoting universal design principles and ensuring that new federal programs and investments produce measurable progress toward this objective
- Ensure the meaningful and ongoing participation of people with disabilities in the design, implementation, and evaluation of housing policies and programs, consistent with the principles of “Nothing Without Us” and the requirements of the Accessible Canada Act
- Strengthen federal data collection and public reporting on accessible housing, including through disaggregated data that reflects the diversity of disability experiences and tracks progress toward the realization of the right to adequate housing

⁴ [The right to housing for people with disabilities: Homelessness | Canadian Human Rights Commission](#). See more on the Monitoring Framework in Section 4.

2. Alignment with Canada's human rights commitments and domestic law

International human rights authorities relevant to accessible housing

Canada's obligations with respect to accessible housing are firmly rooted in international human rights law.

The Convention on the Rights of Persons with Disabilities (CRPD), ratified by Canada in 2010, establishes that States Parties must ensure people with disabilities have access to adequate, accessible, and affordable housing on an equal basis with others.⁵ The CRPD's framing of accessibility as both a precondition for participation and a substantive right underscores that housing is not merely a commodity but a foundation for dignity, autonomy, and inclusion.⁶ For people with disabilities, the right to housing is inseparable from the right to live independently and be included in the community, articulated in Article 19 of the CRPD. Further, the UN Committee on Economic, Social and Cultural Rights has clarified that adequacy includes habitability, accessibility, affordability, and cultural appropriateness.⁷ Accessibility is therefore not an optional feature; it is an essential dimension of adequacy itself.

Other human rights instruments reinforce this understanding. The United Nations Declaration on the Rights of Indigenous Peoples recognizes the right of Indigenous peoples, including those with disabilities, to improved housing conditions that reflect their needs and cultural contexts.⁸ The Convention on the Elimination of All Forms of Discrimination Against Women⁹ and the Convention on the Rights of the Child¹⁰ similarly highlight the obligation to ensure adequate housing without discrimination, including discrimination based on disability.

Taken together, these instruments form a coherent international consensus: accessible housing is a human right under international law, and State Parties must take deliberate, concrete, and targeted steps to progressively realize it. Persistent barriers to accessible housing therefore represent not only policy gaps but also an ongoing failure by Canada to fully implement its international human rights obligations.

⁵ Convention on the Rights of Persons with Disabilities, [Article 19 – Living independently and being included in the community](#), and [Article 28 – Adequate standard of living and social protection](#).

⁶ Convention on the Rights of Persons with Disabilities: [Committee on the Rights of Persons with Disabilities – General Comment No. 2 – Article 9: Accessibility](#)

⁷ United Nations Human Rights Treaty Bodies – Committee on Economic, Social and Cultural Rights: [The right to adequate housing](#)

⁸ United Nations Declaration on the Rights of Indigenous Peoples, [Article 21](#)

⁹ [Convention on the Elimination of all Forms of Discrimination Against Women](#)

¹⁰ [Convention on the Rights of the Child](#)

The Accessible Canada Act

Domestically, the ACA establishes a clear legislative framework for achieving a barrier-free Canada by 2040. Although this Review Panel is examining housing policy, its recommendations should be informed by the ACA because the Act establishes legally binding obligations for federally regulated organizations to identify, remove, and prevent accessibility barriers. This includes barriers related to housing and housing-related programs and services.

The ACA lists seven priority areas: employment; the built environment; communication; information and communication technologies; procurement; programs and services; and transportation.¹¹ Housing is an element of the built environment and is also a component of federal programs and services. Although responsibility for housing is divided between jurisdictions in Canada, the federal government exercises significant influence through funding programs, national strategies, regulatory levers, and direct development of housing in First Nations, Inuit communities and on federal lands.

The ACA designates entities responsible for oversight, enforcement, and accountability related to accessibility. These include:

- The Minister of Jobs and Families, who is responsible for the Accessible Canada Act, and for making decisions about accessibility regulations, programs and policies
- Employment and Social Development Canada, which advises the Minister on accessibility, and develops and implements regulations, policies and programs on accessibility, and disability
- The Accessibility Commissioner, who enforces the Accessible Canada Act and its regulations, reviews accessibility plans, and receives accessibility complaints
- The Chief Accessibility Officer, who advises the Minister, and reports on the outcomes of the Act and on systemic accessibility issues
- Accessibility Standards Canada, which develops and reviews accessibility standards, supports research, and recommends that the government turn accessibility standards into regulations

Under the ACA, federally regulated organizations are required to publish accessibility plans that identify barriers in the seven priority areas, and that explain how they will remove those barriers and prevent new ones. Organizations must consult people with disabilities when preparing their plans.

These plans are more than planning documents – they are accountability mechanisms established under the ACA. They provide a public record of how organizations intend to identify, remove, and prevent barriers, and form an important basis for measuring progress over time.

The Accessibility Commissioner reviews these plans as part of the broader compliance framework established by Parliament. Together with inspections, complaint resolution, compliance promotion, and, where necessary, enforcement activities, Accessibility Plans provide an important means of assessing whether organizations are making measurable progress toward identifying, removing, and preventing barriers.

¹¹ Government of Canada – Accessible Canada Act, [Section 5](#)

Housing-related policies, programs, and services delivered by federally regulated organizations should therefore be reflected in their Accessibility Plans and form part of the organizations' ongoing efforts to identify, remove, and prevent barriers. Accessibility Plans should identify housing-related accessibility barriers that fall within an organization's responsibilities and establish specific, measurable objectives for removing existing barriers, preventing new ones, and demonstrating progress over time.

Integrating these objectives into the Accessibility Plans of federal organizations with responsibilities related to housing supports alignment with the ACA's principles and Canada's human rights commitments, while promoting consistency, transparency, and accountability across government. This includes departments with direct responsibility for housing programs – such as Build Canada Homes, Housing, Infrastructure and Communities Canada, Canada Mortgage and Housing Corporation, and Indigenous Services Canada – as well as those with more indirect responsibility related to housing – such as the National Research Council, which develops the National Building Code that serves as a model for provincial and territorial building codes.

Consistent with the ACA, the Accessibility Commissioner expects that federal organizations with housing-related responsibilities will consider the findings of this Review Panel when strengthening their Accessibility Plans. Accessibility objectives should clearly describe how organizations intend to identify, remove and prevent barriers, establish measurable actions to address those barriers, and demonstrate progress over time. Plans that merely acknowledge accessibility without demonstrating meaningful action will not advance the objectives of the Accessible Canada Act.

Beyond accessibility plans, which establish what organizations intend to do, the accessibility standards developed by Accessibility Standards Canada provide practical guidance on how accessibility can be achieved. Together, these complementary mechanisms support implementation of the ACA by helping organizations understand what accessible design and service delivery should look like, while reducing inconsistency and uncertainty. In particular, the Accessible-Ready Housing Standard¹² is relevant and should be noted by the Review Panel.

¹² [CAN-ASC-2.8:2025 – Accessible-Ready Housing - Accessibility Standards Canada](#)

Recommendations for consideration

In light of the Accessibility Commissioner's responsibilities under the Accessible Canada Act, the Review Panel should consider the following recommendations when developing its advice to the Minister:

- Emphasize the obligations that federal organizations have under the Accessible Canada Act to proactively identify, remove, and prevent barriers in their housing-related policies, programs, and services
- Recommend that accessibility standards – such as the Accessible-Ready Housing Standard¹³ – be included as a condition of eligibility for federal housing and homelessness programs
- Recommend that federal organizations with responsibilities related to housing incorporate measurable objectives related to accessible housing into their Accessibility Plans and report publicly on progress toward achieving them

¹³ [CAN-ASC-2.8:2025 – Accessible-Ready Housing - Accessibility Standards Canada](#)

3. Federal leadership and inter-jurisdictional collaboration

The realization of accessible housing requires coordinated action across jurisdictions. Housing in Canada is shaped by federal, provincial, territorial, municipal, and Indigenous governments, as well as by the private and non-profit sectors.

This shared responsibility can create fragmentation, particularly where accessibility requirements, building codes, funding programs, retrofit supports, emergency planning, and community-based services are not aligned. However, it also creates an important opportunity for federal leadership.

Investments in coordinated services and supports yield long-term economic benefits. When people cannot access appropriate housing, the costs do not disappear. Instead, they are shifted onto healthcare systems, long-term care, emergency shelters, social services, income support programs, and family caregivers. Lack of accessible housing also results in lost opportunities for employment, education, community participation, and economic contribution.

Housing is more than shelter. It is foundational to individual well-being, healthy communities, and the effective functioning of society. Decisions about housing influence health, education, employment, labour force participation, aging in place, community safety, social inclusion, and economic prosperity. As a result, housing policy extends well beyond a single sector or order of government. When housing does not meet people's needs, pressures increase across healthcare, long-term care, social services, emergency response systems, income supports, and other public programs. Conversely, housing that enables people to live independently and participate fully in their communities contributes to better outcomes for individuals while supporting stronger, more resilient public systems. Accessible housing should therefore be understood not simply as a housing policy objective, but as foundational infrastructure that advances Canada's broader social, economic, health, and accessibility objectives.

Through its spending power, policy responsibilities, and obligations under the Accessible Canada Act, the federal government is uniquely positioned to demonstrate national leadership in preventing accessibility barriers. Federal housing investments should be able to demonstrate how accessibility has been incorporated into planning, funding, implementation, and long-term outcomes. Through the National Housing Strategy, federal-provincial-territorial housing agreements, Build Canada Homes, Indigenous housing strategies, infrastructure investments, retrofit programs, and federal real property responsibilities, the Government of Canada can set expectations that advance accessibility, inclusion, and human rights. Federal leadership is particularly important because inaccessible housing is not only a technical or design issue; it affects whether people with disabilities can live independently, remain in their communities, avoid unnecessary institutionalization, pursue education and employment, and participate fully in community life. Accessible housing also enables many seniors to age in place safely and with dignity, reducing pressures on health care, long-term care, and other public systems.

A clear principle should guide all federal action: public funding must never create, maintain, or perpetuate accessibility barriers. The most effective, long-term investments are ones that build in accessibility from the start.

The federal government is currently making housing investments that will shape accessibility outcomes for decades. Decisions made today through Build Canada Homes, the National Housing Strategy, Indigenous housing investments, and related infrastructure initiatives will determine whether future generations inherit accessible communities – or new barriers requiring costly public retrofits.

Where federal funding supports the construction, acquisition, repair, retrofit, or operation of housing, accessibility should be a minimum condition of funding, not an optional consideration. Federal housing investments should also promote the meaningful involvement of qualified accessibility professionals, people with disabilities, and other subject-matter experts throughout the planning, design, and implementation of housing projects. Integrating accessibility expertise from the outset helps identify potential barriers before they are built, supports compliance with accessibility requirements, and reduces the need for costly redesigns or retrofits later. Federal investments should demonstrate how accessibility has been incorporated from project planning through implementation and into long-term outcomes before public funds are committed. This approach will help ensure that new housing supply does not reproduce existing barriers, and that investments in existing housing remove barriers over time, in line with the ACA objective of achieving a barrier-free Canada by 2040.

Harmonization across jurisdictions

Inter-jurisdictional collaboration is essential to advancing accessible housing. Building codes and accessibility requirements vary across Canada, and minimum code requirements have not consistently resulted in housing that is accessible, adaptable, visitable, or suitable for aging in place. The National Building Code provides an important mechanism for national coordination, but much stronger accessibility requirements are needed to ensure that new residential construction aligns with human rights obligations.

Federal leadership can support greater harmonization by encouraging provinces and territories to strengthen residential accessibility requirements and by aligning federal funding programs with accessibility standards such as Accessible-Ready Housing Standard (CAN-ASC-2.8:2025). This includes opportunities to incorporate accessibility-ready housing requirements into future building code updates and to require federally supported housing projects to meet accessibility standards that go beyond minimum code compliance. These measures would help prevent the creation of new barriers while supporting consistency across jurisdictions.¹⁴

Accessible housing cannot be fully realized without coordination across related systems. Housing intersects with health care, long-term care, home and community care, transportation, income supports, disability services, emergency management, employment, and aging policies. For people with disabilities, accessible housing is often only one part of what is needed to live independently and participate fully in community life. Many people also require attendant services, home care, assistive

¹⁴ Australia offers a promising example of a harmonized approach in a federal system similar to Canada's, in which building codes are developed nationally but implemented at the state/provincial level. Australia's National Construction Code (NCC) embeds accessibility requirements directly and mandates them across participating jurisdictions. This means accessibility requirements are enforced through the building approval and certification process, making building codes the primary mechanism of accountability for ensuring accessible homes are delivered.

technology, accessible transportation, and other community-based supports. Seniors may require housing that enables them to age in place safely and remain connected to their communities. Without coordination across these systems, even physically accessible housing may not achieve its intended outcomes in practice.

Accessible housing in existing homes, Indigenous communities, and emergencies

New construction alone will not resolve the shortage of accessible housing – federal leadership is required to address barriers in existing homes. Many people with disabilities live in homes that require modifications, repairs, or retrofits to remain safe and usable. Federal, provincial, territorial, municipal, and Indigenous partners should coordinate and increase funding for accessibility retrofits, home modifications, repairs, and barrier removal. These investments are essential to support independent living, prevent displacement, and reduce reliance on institutional or congregate settings.

Accessible housing needs must be addressed in First Nations, Métis, and Inuit communities, and for Indigenous people living in urban, rural, and northern areas. Housing accessibility cannot be separated from broader housing conditions, infrastructure deficits, overcrowding, climate-related risks, remoteness, and the need for distinctions-based and for-Indigenous, by-Indigenous approaches. Federal leadership should support Indigenous governments and organizations in developing accessible housing solutions that are community-led, culturally appropriate, and grounded in self-determination.

Emergency preparedness is another area requiring interjurisdictional collaboration. People with disabilities face heightened risks when emergency evacuation, temporary accommodations, shelters, communications, transportation, and recovery supports are inaccessible. Federal partners should work with provincial, territorial, municipal, and Indigenous governments to ensure that emergency planning includes accessible evacuation procedures, accessible temporary accommodation, continuity of disability-related supports, and meaningful participation of people with disabilities in preparedness and response planning.

Recommendations for consideration

In light of the Accessibility Commissioner's responsibilities under the Accessible Canada Act, the Review Panel should consider the following recommendations when developing its advice to the Minister:

- Embed accessibility requirements in the renewal of the National Housing Strategy, including in the federal-provincial-territorial housing partnership framework, bilateral agreements, and municipal partnerships under Reaching Home and Build Canada Homes. Accessibility should also be embedded in Indigenous housing initiatives, retrofit programs, and emergency preparedness planning
- Support harmonization of building codes through the incorporation of stronger accessible housing requirements into the National Building Code,¹⁵ and aligning federal funding transfers with recognized accessibility standards, where appropriate
- Strengthening intergovernmental collaboration on accessible housing through federal-provincial-territorial and distinctions-based Indigenous forums to promote common accessibility objectives, share best practices, and coordinate housing, transportation, disability supports, and emergency planning

¹⁵ For example, in Budget 2024 the federal government tied major infrastructure funding to the condition that provinces and territories adopt the latest version of the National Building Code.

4. Targets, data, and measurement

Monitoring the right to housing for people with disabilities

Better data and stronger accountability mechanisms are essential for demonstrating whether federal organizations are identifying, removing, and preventing barriers as intended under the ACA. Without measurable outcomes, progress towards achieving accessibility goals cannot be demonstrated. Accountability requires evidence that barriers are being removed and prevented, not simply evidence that programs have been funded.

The CHRC and the Federal Housing Advocate have developed a framework to monitor the right to adequate housing for people with disabilities in Canada. This framework provides a structured approach to assessing housing outcomes, policy efforts, and government resources, to help monitor and report on Canada's human rights obligations under Canadian and international law.

The Monitoring Framework expands on the seven elements of adequate housing identified by the United Nations, adding four new areas: institutionalization, homelessness, discrimination and dignity, and safety. This expansion was informed by the CRPD and developed collaboratively with people with disabilities. It provides a more comprehensive basis for assessing whether Canada is meeting its human rights obligations and reflects a broad understanding of housing as essential to dignity, autonomy, safety, and inclusion in the community.

Unlike traditional housing measures that focus primarily on the number of housing units delivered, the Monitoring Framework evaluates whether people with disabilities are experiencing meaningful improvements in their ability to live independently, safely, and with dignity. Monitoring is therefore not simply about collecting better data — it is about determining whether governments are progressively realizing the right to adequate housing through measurable improvements in people's lives.

The framework uses Statistics Canada data to measure indicators in each outcome area.¹⁶ It compares results for people with disabilities and people without disabilities and looks at change over time in each indicator.

The results provide quantitative evidence of long-standing concerns consistently raised by people with disabilities and demonstrate systemic inequalities across nearly every dimension of housing, accessibility, community inclusion, and independent living. Many disparities are even more pronounced for women with disabilities.

¹⁶ Baseline data for the outcome indicators are published here: [Monitoring the right to housing for people with disabilities | Canadian Human Rights Commission](#)

Data gaps

Significant data gaps limit the ability to fully understand and monitor the right to adequate and accessible housing for people with disabilities. Existing data is often incomplete, not disaggregated, or does not capture the full diversity of disability experiences, including cognitive, sensory, and non-visible disabilities. In some cases, data sources do not consistently identify whether individuals have disabilities, further limiting the ability to assess outcomes. The absence of clear, consistent targets and benchmarks for accessible housing highlights the need for more structured approaches to tracking progress and ensuring accountability. Without clear performance measures, timelines, and public reporting, it is difficult to determine whether governments are making meaningful progress toward realizing the right to adequate housing for people with disabilities. Better measurement is essential not only to improve policy decisions, but also to strengthen transparency, accountability, and public confidence that investments are producing measurable results.

There is particularly limited data on populations most at risk of housing precarity, including people living in institutions, those experiencing homelessness or hidden homelessness, and individuals in rural, remote, northern, and Indigenous communities. These gaps make it difficult to assess the extent of unmet need and to design effective policy responses. Existing measurement approaches do not consistently capture outcomes for people with disabilities, which limits the ability to assess whether policies and programs are effectively realizing the right to adequate housing.

Current data sources also do not consistently capture the relationship between housing, supports, income, and community inclusion. As a result, key dimensions of the right to adequate housing, such as access to services, cultural adequacy, and the ability to live independently, remain under-measured.

Addressing these gaps will require better coordination to improve how data is collected. This includes using more detailed data, working with communities, and designing approaches together with people with disabilities.

Recommendations for consideration

Measurement and reporting of the success of Build Canada Homes and the next iteration of the National Housing Strategy should be based on human rights outcomes that demonstrate measurable improvements in the lives of people with disabilities, rather than relying primarily on construction outputs or financial investments. Success should be measured by whether more people with disabilities are able to live independently in housing that is affordable, accessible, safe, and connected to the supports they require.

In light of the Accessibility Commissioner's responsibilities under the Accessible Canada Act, the Review Panel should consider the following recommendations when developing its advice to the Minister:

- Enhance data collection on the housing experiences of people with disabilities by collecting comprehensive information on the supply of and demand for accessible housing; ensuring national surveys include people with diverse disabilities; disaggregating data to identify barriers experienced by different groups; and meaningfully involving people with disabilities in the development, collection, and analysis of data
- Establish measurable national accessibility targets and publicly report on progress toward reducing unmet need for accessible and affordable housing for people with disabilities
- Enhance federal coordination with provinces, territories, municipalities, and Indigenous governments to leverage existing data to monitor and report on accessibility outcomes in housing, including access to supports and services

5. Scaling success and innovation to advance the right to accessible housing

Looking ahead

Advancing the right to accessible housing will require governments, industry, researchers, and community organizations to identify, scale, and share promising practices that respond to the evolving needs of people with disabilities.

Emerging technologies, digital systems, automated services, and new housing models have significant potential to improve accessibility. Tools such as smart home systems, assistive devices, artificial intelligence, robotics, and interoperable digital technologies can help people with disabilities live more independently, safely, and with greater control over their daily lives. But they can also create new forms of exclusion if accessibility is not embedded from the outset. Just as physical barriers should not be built into new housing, technological barriers should not be built into the next generation of housing solutions.

Innovation should never be viewed as an end in itself. It should be guided by one fundamental question: does it remove barriers or create them? The quality of innovation should be evaluated by its ability to expand choice, strengthen independence, and improve quality of life for people with disabilities. Technologies that introduce new accessibility barriers cannot reasonably be considered accessibility innovations.

New technologies should also complement – not replace – the human supports, accessible design, and inclusive policies that together make independent living possible. And, as emphasized throughout this submission, new approaches, technologies, and design solutions must be developed and implemented in partnership with people with disabilities to ensure they respond to lived realities and do not create unintended barriers.

Ultimately, accessibility and innovation are complementary rather than competing objectives. Designing for accessibility from the beginning encourages innovation, reduces long-term costs, and creates housing that is more adaptable to changing needs over time.

New housing models

One promising practice is the Canada Mortgage and Housing Corporation's Housing Design Catalogue, which incorporates both "Accessible-Ready" and "Enhanced Accessible" design elements into standardized housing designs.¹⁷ The inclusion of these accessibility features reflects growing recognition that accessibility should be considered from the earliest stages of housing design rather than added later through costly retrofits. The integration of accessibility considerations into a national housing design resource also demonstrates how federal leadership can help normalize accessible design as a mainstream housing objective rather than a specialized requirement for a small segment of the population. Achieving these outcomes also requires multidisciplinary collaboration. Qualified accessibility professionals, people with disabilities, and other subject-matter experts should be meaningfully involved throughout the planning, design, construction, implementation, and evaluation of housing projects to help ensure that accessibility is effectively integrated from the outset.

The Housing Design Catalogue also illustrates how collaboration across organizations can help advance accessibility outcomes. The inclusion of accessibility-focused design options reflects advocacy by accessibility and housing rights leaders, who have emphasized that federal investments should help prevent the creation of new barriers.

As governments increase investments in housing modernization and digital infrastructure, accessibility should be treated as core infrastructure rather than an optional feature or future enhancement.

Looking ahead, similar approaches should be encouraged across housing programs, procurement processes, and infrastructure investments. Promising practices should be evaluated not only for their technical effectiveness, but also for their contribution to dignity, autonomy, participation, and inclusion.

Scaling successful innovations while ensuring that new barriers are not introduced will help ensure that investments in housing produce measurable improvements in independence, safety, inclusion, and dignity for people with disabilities, while advancing both the right to adequate housing and the ACA's goal of a barrier-free Canada by 2040.

¹⁷ [Canadian Mortgage and Housing Corporation – Housing Design Catalogue](#)

Recommendations for consideration

In light of the Accessibility Commissioner's responsibilities under the Accessible Canada Act, the Review Panel should consider the following recommendations when developing its advice to the Minister:

- Encourage innovative practices that expand accessible housing options, including accessible-ready design, assistive technologies, smart-home solutions, and other emerging approaches, while also encouraging research, pilot projects, and evaluation of emerging accessibility technologies so that successful innovations can be scaled nationally and integrated into future housing programs
- Ensure that digital technologies incorporated into federally-funded housing – including smart home systems, digital building controls, security systems, tenant portals, robotics, and artificial intelligence-enabled services – meet recognized accessibility standards and are usable by people with diverse disabilities

Conclusion – Accessibility is opportunity

Accessibility is not only a shared responsibility, but also a shared opportunity. Every conversation, every decision, and every improvement help shape a Canada where everyone feels included, respected, and able to participate fully in all this country has to offer.

Increasingly, accessibility is being recognized not simply as an obligation, but as a foundation for a stronger, more innovative, and more resilient Canada. Accessible housing is a practical and economically sound investment that benefits individuals, communities, and governments alike. When everyone can participate fully, Canada's workplaces, communities, and economy become stronger.

Accessible housing should therefore be understood not as a specialized accommodation for a few, but as essential public infrastructure that supports inclusion, strengthens communities, and enables people with disabilities to contribute fully to Canada's social and economic life.

Success in this area requires that federal investments in housing be built on a foundation of accessibility. Federal programs, policies, funding, and investments must not maintain or perpetuate existing barriers, nor should they create new ones.

The decisions made today through Build Canada Homes, the next National Housing Strategy, Indigenous housing investments, and related federal initiatives represent one of the largest opportunities in a generation to create the inclusive, accessible housing Canada needs. If accessibility is not embedded now, Canada risks investing billions of public dollars in housing that future governments will be required to retrofit – at significant public expense and with avoidable consequences for people with disabilities. Accessibility cannot remain something considered after decisions have been made. It must be a fundamental criterion by which public investments, policies, and programs are designed and evaluated.

A central objective of the Accessible Canada Act is to identify, remove, and prevent barriers. Ultimately, accessibility is measured not only by the barriers we remove, but by the barriers we prevent from being created in the first place. That principle should guide every federally funded housing investment made today. Prevention is not only the most effective accessibility strategy—it is also good public policy, sound stewardship of public resources, and the surest path toward a barrier-free Canada.

While important progress has been made, there is still more work ahead. Accessibility is an ongoing journey. A barrier-free Canada will not be achieved by chance. It will be achieved through deliberate choices that embed accessibility into every investment, every policy, and every home we build.

If Canada is serious about achieving a barrier-free Canada by 2040, accessibility must be built into the housing decisions made today. The legacy of this generation's housing investments should not be new barriers, but new opportunities for people with disabilities to live independently, participate fully, and contribute to stronger communities across Canada.

As Accessibility Commissioner, I will continue to encourage – and expect federally regulated organizations with housing-related responsibilities to demonstrate – measurable progress toward identifying, removing, and preventing barriers within the areas for which they are responsible. The Accessible Canada Act provides the framework for achieving a barrier-free Canada. Accessibility is not only our shared responsibility — it is also our shared opportunity. The decisions we make today will determine whether future generations inherit accessible communities that enable everyone to participate fully, or barriers that could and should have been prevented.

Summary of recommendations

A barrier-free Canada cannot be achieved without accessible housing. Consistent with the Accessibility Commissioner's responsibilities under the Accessible Canada Act, and informed by the evidence presented in this submission, the following recommendations are provided for the Review Panel's consideration in developing its advice to the Minister.

1. Ensure the meaningful and ongoing participation of people with disabilities in the design, implementation, and evaluation of housing policies and programs, consistent with the Accessible Canada Act and the principle of "Nothing Without Us."
2. Adopt a broader understanding of accessible housing that recognizes the role of accessible design, supports, services, assistive technologies, and community participation in enabling inclusion, independence, and full participation.
3. Ensure that federal housing policies and programs address accessibility beyond physical design by incorporating the supports, services, income supports, and emerging technologies that enable independent living.
4. Integrate cultural adequacy as a core component of accessible housing in federal policy, funding, and program design, particularly for Indigenous peoples and other diverse communities.
5. Ensure that federally regulated organizations with housing-related responsibilities demonstrate measurable progress toward identifying, removing, and preventing barriers through their housing-related policies, programs, services, funding, procurement, and infrastructure investments, consistent with their obligations under the Accessible Canada Act.
6. Require federal organizations with housing-related responsibilities to incorporate measurable accessible housing objectives into their Accessibility Plans and publicly report on the progress they are making toward achieving them.
7. Promote the use of accessibility standards, including the Accessible-Ready Housing Standard, as a condition of eligibility for relevant federal housing and homelessness programs.
8. Ensure that accessibility is embedded from the outset in the planning, design, funding, implementation, and evaluation of federally supported housing initiatives through the meaningful involvement of people with disabilities and qualified accessibility professionals.
9. Ensure that federal housing investments, including Build Canada Homes, the National Housing Strategy, Indigenous housing initiatives, retrofit programs, and related infrastructure investments, do not create, maintain, or perpetuate accessibility barriers, and make accessibility a condition of federal funding.
10. Support greater harmonization of accessibility requirements across jurisdictions by strengthening accessibility provisions in the National Building Code and aligning federal funding with recognized accessibility standards, where appropriate.
11. Strengthen data collection and public reporting on the housing experiences of people with disabilities, including those living in institutions, experiencing homelessness, children, people in rural and northern communities, and First Nations people living on reserve, while improving national data on the supply of and demand for accessible housing.
12. Measure the success of federal housing investments against measurable accessibility and human rights outcomes—not solely housing outputs or financial investments—and publicly report progress toward reducing barriers for people with disabilities.
13. Support innovation that demonstrably removes barriers, enables independent living, and ensures that emerging technologies and housing models are accessible by design and do not introduce new barriers.