



Centre for Equality Rights in Accommodation
Centre pour les droits à l'égalité au logement

November 23, 2020

Subcommittee on the Protection of Affordable Rental Housing

Item RH4.2 – Work Plan on the Preservation of Affordable Rental Housing

Dear Members of the Subcommittee on the Protection of Affordable Rental Housing,

The City's work on supporting tenants and preserving affordable rental housing continues to move in the right direction. We are encouraged by the efforts made so far in these areas, which could not come at a more crucial time for tenants. In particular, we are thrilled to see the City engage directly with tenants and tenant advocates, and we support the proposal to create a new Tenant Advisory Committee and develop a workplan to address pressing issues related to the protection of affordable rental housing. We would like to share some recommendations as you move forward on both of these initiatives

Tenant Advisory Committee

A human rights-based approach to housing policy must include a commitment to rights-based decision making, participation, and leadership. Under this approach the design, implementation, and monitoring of housing policy must be undertaken with meaningful engagement from individuals, communities, civil society organizations, and other stakeholders directly affected by inadequate housing and homelessness. As such, CERA supports the creation of a Tenant Advisory Committee with an expanded mandate that aligns with a rights-based approach.

The establishment of a Tenant Advisory Committee has the potential to be another critical and positive step along the way of the progressive realization of the right to adequate housing. CERA has been pleased to participate as a member of the current Advisory Committee on the Protection of Affordable Rental Housing and as a member of the External Advisory Committee for the development of the HousingTO 2020-2030 plan, both which serve as strong examples of meaningful engagement.

We are pleased to see that the membership composition of the Committee proposes to include right to housing advocates and we encourage this Subcommittee to approve the creation of a new Tenant Advisory Committee with an expansive mandate that includes opportunities for meaningful engagement, participation and leadership.

Development of 2021 Workplan

Intergovernmental cooperation alongside coordinated governance, action and resources is another key component of a rights-based approach to housing policy. Last week, the City released a framework for the regulation of multi-tenant houses which relied heavily on intergovernmental cooperation and coordination for completion and recommended an interdivisional model going forward. The final result of this cooperation represents a positive step forward towards the progressive realization of the right to housing in Toronto. Not only was this the first City of Toronto policy since the adoption of the HousingTO 2020-2030 action plan to be developed using a human rights lens; the final product was one deeply grounded in human rights-based principles and action. As noted in our written submission to the Planning and Housing Committee about this item, we are optimistic about the Framework's potential for aligning multi-tenant housing policy with the City's commitment to realizing of the right to housing, and we hope it will act as a precedent for the development of future housing policy.

We are equally optimistic about the recommended interdivisional model under which the 2021 and future workplans will be developed by City staff and through engagement with the Tenant Advisory Committee. We encourage any opportunity for increased collaboration and cooperation among City divisions and with those directly affected by inadequate and unaffordable housing. We hope the workplan process will act as another example of how this increased collaboration and cooperation will result in housing policy grounded in human rights-based principles and action.

Housing Commissioner

Rights-based approaches to housing policy, such as those outlined above, will increasingly rely on interdivisional and interagency collaboration/communication as well as the participation and engagement of and leadership from tenants with lived experience and tenant advocacy organizations. Inevitably, and helpfully, this approach will result in the identification and reporting of systemic housing related issues. As such, the need for an independent Housing Commissioner remains paramount in order for the City to be in a position to adequately address any systemic issues that are raised. This will allow the City to receive systemic issues and ensure the planning and direction undertaken by City staff

and tenant stakeholders aligns with addressing these systemic issues. As such, we strongly encourage the City continue to move forward on its commitment to establish an independent Housing Commissioner and office.

Thank you.