



Right to Housing

in Toronto

September 21, 2020

Right to Housing Toronto Deputation to Planning & Housing Committee, 22 Sept. 2020

RE: PH 16.5 Improving Outcomes for Toronto Residents through Implementation of HousingTO 2020-2030

Presented by Emily Paradis, PhD., Maytree Fellow on behalf of R2HTO

Good morning councilors, staff, advocates and residents of Toronto.

I am here on behalf of Right to Housing in Toronto (R2HTO), a network of individuals and organizations working to ensure that the City of Toronto takes a rights-based approach to its housing planning and policy.

First and foremost, we are pleased that the City has taken steps to view housing and planning policy through a Right to Housing lens and incorporate a rights-based approach to housing policy into the Implementation Plan. We appreciate the City's initiative and resilience in releasing this plan despite the increased pressures that have arisen due to COVID-19.

Considering these pressures, R2HTO recommends that the City reconsiders and front-loads the HousingTO targets in light of the worsened housing and homelessness crisis due to COVID. It is R2HTO's position that the creation of 40,000 new housing units should be considered a minimum, and the City should aim to achieve this number in the shortest time possible.

R2HTO notes that the Implementation Plan, in its current form, is a "living document". Going forward, we call for more concrete and specific targets, timelines, and indicators so that the implementation of the Plan can be effectively monitored.

We are pleased to see that this plan reaffirms the City's commitment to the progressive realization of the right to housing. We are also pleased to see that the implementation of the Office of the Housing Commissioner is described as a key component of ensuring the implementation of the Toronto Housing Charter.

However, we are deeply concerned that clear guidelines, timelines and measures for the establishment of an Office of the Housing Commissioner were not prioritized or included in the plan. This is particularly alarming given the fact that the Housing Commissioner will act as a key accountability mechanism of the City's rights-based approach to housing policy; a necessary and crucial approach for dealing with long-term housing issues and emergency issues that have arisen due to the COVID-19 pandemic. The COVID-19 pandemic has highlighted the impacts and consequences of housing insecurity and has demonstrated that the Right to Housing is of utmost importance to the lives and wellbeing of all citizens of Toronto. Emergency housing issues such as encampments and access to shelters have reached critical status. Moving forward, a Housing Commissioner would ensure accountability, transparency and action towards finding effective rights-based solutions to these pressing issues and lessen the negative impacts of future pandemics.

The stated mission of the HousingTO plan is "to provide Torontonians with housing that is safe, affordable and suitable to their needs." To achieve this mission, a Housing Commissioner is key. The Commissioner can ensure that correct measures are in place, targets are met, and will provide recommendations to guide sustainable and effective housing policy, including the realization of the Toronto Housing Charter. Without the immediate creation/appointment of a Housing Commissioner, the right to adequate housing, as recognized throughout the plan, will be delayed indefinitely – substantially increasing the risk of sliding backwards on the progressive realization of the Right to Housing. Immediate action is required.

Once the Office of the Housing Commissioner is established, we recommend that the Housing Commissioner report directly to City Council. This structuring of the reporting relationship in this manner is necessary for true independence, and therefore effectiveness. A lack of independence runs contrary to the basic objective of an accountability officer - to scrutinize the operation of government and associated bodies. The independent nature of the Commissioner's operations should be made explicit in its mandate.

Finally, while the Housing Commissioner is a human rights-based accountability officer, R2HTO is recommending that the role of the Housing Commissioner be distinct from the City's other human rights-based accountability officers that typically focus on issues experienced at the individual level. R2HTO envisions a Housing Commissioner role with the power to monitor, claim, and enforce the right to adequate housing across Toronto with the ability to recommend corrective actions to systemic barriers.

Ultimately, while we recognize the efforts and progress made by the City with the implementation plan, we firmly believe that the immediate establishment of a Housing Commissioner is a matter of significant importance and urgency and must be prioritized by the City.

Sincerely,

On behalf of the Right to Housing in Toronto