



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,

We are writing on behalf of the Right to Housing in Toronto (R2HTO), a coalition of organizations and individuals working to support the implementation of the human right to housing by the City of Toronto.

The City's work on supporting tenants and preserving affordable rental housing continues to move in the right direction. Continued direct engagement with tenants and tenant advocates is a necessary step for moving towards the progressive realization of the right to housing. We are pleased to see the Subcommittee recognizes the importance of this engagement in its plans for developing a Tenant Advisory Committee and future work plans to address pressing issues related to the protection of affordable rental housing. We would like to share some recommendations as you move forward with 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. This approach includes meaningful engagement with individuals and communities with lived experience along with advocates and organizations with technical human rights and right to housing expertise. We are pleased to see that the proposed composition of the Tenant Advisory Committee requires representation from persons with lived experience. We are also pleased to see the Tenant Advisory Committee will include right to housing advocates.

We do note that the third recommendation under consideration by this Subcommittee includes a direction for all City divisions undertaking housing related work to consult with the Tenant Advisory

Committee. We also note that the Housing Secretariat's report frequently employs the term consult when describing opportunities for input and participation from the Tenant Advisory Committee. It is R2HTO's position that in order to fully align with a rights-based approach to housing policy, these opportunities must go beyond mere consultation and, instead, ensure the meaningful and direct engagement with all members of the Committee and especially those with lived experience.

We encourage this Subcommittee to ensure the creation of a new Tenant Advisory Committee includes a mandate for opportunities for meaningful engagement, participation and leadership.

#### Development of 2021 Workplan

Requiring intergovernmental cooperation and coordinated governance, action and resources is another key principle of a rights-based approach to housing policy. The City's recently released framework regarding multi-tenant houses is an excellent example of how intergovernmental cooperation and coordination can be used to both develop and implement housing policy with a deep grounding in human rights-based principles. We are pleased to see the same interdivisional model / approach is being considered regarding the development of the 2021 and future workplans. We are also pleased to see this approach recognizes the importance of engagement and cooperation with members of the proposed Tenant Advisory Committee. We hope the development and implementation of the Workplans in question will act as another example of how increased collaboration and cooperation results in housing policy that aligns with the City's commitment to the progressive realization of the right to housing.

The collection and analysis of high-quality data can help determine the impacts of housing policies and programs on the housing rights of priority populations and equity-seeking groups. More data is on evictions (legal, informal and illegal), the loss of affordability, and the state of affordable housing throughout the City is desperately needed to ensure the development of responsive housing policy. We commend the Workplan's proposed development of a Data Strategy to help support eviction prevention and affordable rental housing protection work.

#### Housing Commissioner

Both the meaningful engagement with the Tenant Advisory Committee and increased coordination between City staff will undoubtedly result in the identification and reporting of systemic housing related issues. As such, there will be a need for an independent Housing Commissioner role and office to ensure

the City will be positioned to receive and adequately address any systemic issues that come to the City's attention. As such, we strongly encourage the City continue to move forward on its commitment to establish an independent Housing Commissioner and office.

Thank you,

On behalf of the Right to Housing in Toronto.