

A D V O C A T I N G F O R

FAIRNESS

TORONTO OMBUDSMAN

T H E O F F I C E O F L A S T R E S O R T



OFFICE OF THE OMBUDSMAN

March 2015

His Worship Mayor John Tory and Members
of Toronto City Council

I am pleased to submit my 2014 Annual Report to City Council for the period January 1, 2014, to December 31, 2014, pursuant to section 173 (2) of the *City of Toronto Act 2006* and the City of Toronto Municipal Code Chapter 3.

Yours sincerely,



FIONA CREAN

Ombudsman
City of Toronto

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**TO ENSURE
THAT RESIDENTS
OF TORONTO
ARE TREATED
EQUITABLY
& FAIRLY
BY THEIR CITY
GOVERNMENT**

OMBUDSMAN'S MESSAGE

A GROUNDBREAKING AUDIT... FOUND OUR OFFICE HAS IMPROVED ADMINISTRATION AT THE CITY OF TORONTO BY "PROMOTING A PEOPLE-CENTRED APPROACH TO GOVERNMENT AND ADVANCING EQUITY AND FAIRNESS IN THE DELIVERY OF SERVICES TO THE PUBLIC."



Last year was a watershed for us: we became five years old in April. Our office has now gone from a newly added mechanism for accountability in local government to one embedded in the civic DNA of Toronto. This is clear from the rise in the number of complaints—a 129 per cent increase since we opened.

But this success brings with it a challenge: the challenge of providing an effective system of oversight for the city's administration, a promise that was made to residents in the *City of Toronto Act*. That is the test now facing the city, and the new Council, namely, ensuring the Ombudsman's office can meet its mandate. And as jurisdictions around the world have found, that can only be assured through an independent and adequately funded office of oversight.

No one said it was going to be easy. Toronto's population is now close to three million. Half of our residents were born outside Canada and count as their mother tongue one of more than 160 languages. This means a public servant is quite likely dealing with a resident who comes from a different cultural background and has a different expectation of what should happen.

Complainants often face a disadvantage when it comes to geography. The farther away they are from transit and downtown, the less likely they are to contact us. Yet residents in Scarborough, North York and Etobicoke have an equal right to fair treatment and just as much need for our services. What makes this disparity especially disturbing is that people who are marginalized, those who most need the Ombudsman's help, often reside away from the downtown core.

At the same time, expectations of the Ombudsman have increased, as more residents understand our mandate. Residents are better informed and bring more complex complaints to our office. This means the time staff devote to resolving them has increased. Demand is far outstripping capacity. This is the defining gap the Ombudsman and City Council need to address. The promise of fairness and equity is hollow if residents do not have access to the means of ensuring it.

Despite the pressures, we conducted 33 investigations over the past five years, 25 of which were complex, systemic ones. To date, more than 310 of our recommendations have been implemented or are in progress. In addition, Council has approved more than 60 motions supporting our findings.

We have seen important results, which include improvements in legislation, policies and procedures; improvements in the way the public service communicates, both internally between divisions and externally with the public; and an increase in fairness, accountability and transparency.

These results were recently corroborated by a groundbreaking audit of the office's impact on the provision of city services. Conducted by a team from Ryerson University and sponsored by the International Ombudsman Institute, the study found our office has improved administration at the City of Toronto by "promoting a people-centred approach to government and advancing equity and fairness in the delivery of services to the public."

In May 2014 City Council recognized our value by giving us jurisdiction over additional City-controlled corporations such as Build Toronto, Invest Toronto and Toronto Hydro. The office also now has jurisdiction over the newly-created special constables in public transit. While I welcome the additional complaints, I note that the expanded jurisdiction was not accompanied by increased resources. This failure will exacerbate the existing gap in service.

A challenge of a different sort followed quickly at Queen's Park. Bill 8, the *Public Sector and MPP Accountability Act* would have brought in the provincial Ombudsman as another oversight office, sweeping away the independence and finality of the Toronto Ombudsman's powers and the office's accountability to City Council. This would have promoted confusion, red tape and inefficiency and caused unnecessary costs. Although Bill 8 became law, the Ontario Legislative Assembly accepted our submissions and exempted us from the provincial oversight except in specific circumstances. Thus, we continue to act as the office of last resort for investigating complaints about Toronto government.

Much is at stake for the future of accountability at the City of Toronto. A modern government cannot expect to retain the confidence of the people unless it is willing to hold itself accountable by submitting itself to the kind of scrutiny an independent ombudsman provides. While Council recognizes this in principle, insufficient finances increasingly contradict that support.

The residents of Toronto count on their municipal government to properly fund the office in order to meet our mandate effectively. That assumption remains unfulfilled, even though the money required is an investment in a strong system of accountability that produces savings and good governance.

I reluctantly have to warn Council and the public, again, that our ability to meet our statutory mandate defined by provincial legislation is undermined by a lack of funding. Toronto cannot have a legislated ombudsman who is "independent" and then have the office's work indirectly controlled through budget allocation.

It could be said that the office is a victim of its own success. But that loses sight of who is important. The real victims of this funding shortfall are the residents who will not be able to get swift action on their complaints, those who continue to face unfair and unequal provision of city services.

There is more to be gained here than the public's right to an independent investigation of their complaints. Filing complaints is an opportunity for residents to shape the way government provides services. It is a crucial part of good governance and defines what the City of Toronto can be.

I want to acknowledge all those residents who took the time and had the strength to bring us their complaints. Those complaints have helped not just themselves, but countless others, creating changes to systems across the public service. I also want to thank the many dedicated public servants who go the extra mile every day. And I salute the ombudsman team, who make it all happen.



FIONA CREAN
Ombudsman of Toronto

EVERY DAY THE OMBUDSMAN'S OFFICE
SOLVES PROBLEMS FOR INDIVIDUALS BY ASKING
QUESTIONS, PROVIDING INFORMATION, MEDIATING,
EXPLAINING AND FINDING SOLUTIONS. SOMETIMES
THE PROCESS RESULTS IN CHANGES TO A POLICY
OR PROCEDURE BUT MOSTLY IT'S GETTING THE
RIGHT ANSWER FOR INDIVIDUALS.



MAKING CHANGES

▶ TO DATE

33 full investigations were conducted over the past five years > 25 of these were sys

The formal investigations and systemic reviews bring big systems changes to public administration and improve fairness for everyone.

Ombudsman investigations result in recommendations aimed at generating achievable remedies to systemic barriers and flaws in city administration. Since the Ombudsman office opened in 2009, 33 investigations have been conducted, of which 25 were broad-based systemic reviews. The Ombudsman has made more than 310 recommendations to date. The City has agreed to all of them. In fact, City Council and its committees have adopted another 60 motions that add to the recommendations from the investigations.

Here are some of the investigations that have generated the most significant systemic changes to how Toronto's public services work.

A DUTY TO CARE - resulted in a city-wide framework now used in providing service to individuals with diminished capacity.

POTHoles, FLOODS AND BROKEN BRANCHES - examined how the City handles third-party liability claims for under \$10,000 and resulted in a reform of the claims process.

AN INVESTIGATION INTO THE PARKING DISPUTE SYSTEM - made system-wide improvements to procedures in handling parking tickets so that drivers can more easily get accurate information, understand their options and avoid court.

WATER WORKS - found the system for metering, recording and billing water usage generally worked well but needed an amendment to the Municipal Code, giving staff the authority to adjust water bills in exceptional circumstances.

TUNNEL VISION - found poor public communications in the handling of a TTC second exit project and resulted in a public consultation policy, timely notifications to residents and skills training for Toronto Transit Commission staff.

AN INVESTIGATION INTO THE PROVISION OF EMERGENCY HUMAN SERVICES FOLLOWING THE 200 WELLESLEY STREET FIRE - resulted in new protocols and improved communications to address vulnerable residents, a single point of decision-making authority and new, clearly defined roles among the various responders.

WHEEL-TRANS IS WATCHING - resulted in a new re-assessment system for riders when the Ombudsman found riders were not being informed they were being filmed and the videos used to do the re-assessment.

AN INVESTIGATION INTO THE ADMINISTRATION OF THE PUBLIC APPOINTMENTS POLICY - made improvements to the policy to ensure a fair, open and competitive process for selecting board members.

HOUSING AT RISK - resulted in recommendations to ensure equitable, consistent, lawful and humane conduct towards Toronto Community Housing's seniors to prevent evictions.

UNRULE(Y) BEHAVIOUR - found that senior management at Toronto Community Housing did not know their obligations and failed to comply with their own human resource policies, resulting in changes to fix the systemic flaws.



▶ TO THE SYSTEM

temic investigations > over 310 recommendations have been implemented or are in progress >>

WHEN THINGS GO

HOW DID YOU HEAR ABOUT US?



71%

MEDIA / WEB / SOCIAL MEDIA



29%

FRIEND / COMMUNITY / ELECTED REPRESENTATIVE



RESOLVE COMPLAINT

RESOLVED

NOT RESOLVED

NO FURTHER ACTION NEEDED



YES

PROVIDE INFORMATION OR REFERRAL



NO

IS COMPLAINT WITHIN MANDATE?

2. RESOLVE

1. START PROCESS



WRONG



GATHER THE FACTS FROM
PEOPLE AND DOCUMENTS

3. INVESTIGATE

IF THERE WASN'T AN OMBUDSMAN,
YOU'D PROBABLY HAVE TO
INVENT ONE. - *Public Servant*



PRESENT FINDINGS
AND RECOMMENDATIONS

4. RECOMMEND



INVESTIGATIONS

THE OMBUDSMAN LAUNCHES A FORMAL INVESTIGATION WHEN A COMPLAINT INVOLVES COMPLEX OR CONFLICTING INFORMATION, MULTIPLE ISSUES OR CASES WHERE THERE ARE SYSTEMIC OR PUBLIC INTEREST IMPLICATIONS. AN INVESTIGATION, WHICH CAN TAKE SEVERAL MONTHS AND UP TO A YEAR DEPENDING ON COMPLEXITY, USUALLY RESULTS IN A REPORT AND RECOMMENDATIONS.



TCH SCORE: 10 DONE, 17 IN PROGRESS, 2 INADEQUATE

Update on protecting seniors from eviction

In March the Ombudsman gave City Council an update to her investigation of the previous year about protecting seniors in Toronto Community Housing (TCH) from unfair eviction based on rent arrears. That report had included 30 recommendations, all of which TCH accepted. Council asked the Ombudsman to follow the progress of TCH and report back.

The Ombudsman found that, of the 30 recommendations, TCH had completed 10, was making progress on 17, and had made insufficient progress on two. One was not yet due. Of particular concern was the inadequate work done on an action plan for vulnerable seniors and the creation of a consulting relationship with the Centre for Addiction and Mental Health or comparable organization.

The Ombudsman had also reviewed eight eviction files and thought seven were salvageable. She provided advice on these files and noted that TCH staff had been making their best efforts to prevent evictions.

The Ombudsman said she would continue to monitor TCH progress on the recommendations.

By December, 17 recommendations had been completed, nine were substantially completed, and three remained in progress.



TCH NEEDS TO FOLLOW ITS OWN POLICIES

Unrule(y) behaviour in human resources

In April the Ombudsman released *Unrule(y) Behaviour*, an investigation report on recruitment and compensation practices for staff at TCH. The investigation began in August 2013 after many complaints from former and current employees about improper hiring and promotions, irregular compensation and unfair terminations.

The investigation found the CEO and other senior managers repeatedly broke human resource rules along with compensation and conflict of interest policies.

There were either no records or no competitions held for 19 per cent of the 96 new staff hired over 18 months. Some staff were hired without job postings. Of the 88 staff who left, 45 were terminated, 32 resigned and 11 retired. The

changes, made with apparent disregard for the rules and fair process, created chaos and left the organization without the necessary skills and adequate institutional memory.

The Ombudsman recommended that TCH follow its own human resource policies, train people in them, compile standard information on hiring and promotion, and expand their conflict of interest policy. TCH accepted all 12 recommendations.



WORKPLACE REVIEW PROCEDURE INHERENTLY UNFAIR

Investigating an investigation

In 2008 Mr. Y, who worked for the City's Transportation Division, signed a licensing agreement granting the City use of his private software.

Over the years, management raised concerns about Mr. Y's potential conflict in his roles as both employee and private licensor. A workplace review into this potential conflict of interest started in April 2012 and resulted in his termination that November.

Mr. Y came to the Ombudsman's office in 2013, saying the review was unfair. The Ombudsman decided to investigate the process used.

The investigation found that overall the process was inadequate and procedurally flawed. Mr. Y was largely kept in the dark in spite of his repeated requests for information on the process. Management determined the outcome before they finished gathering the evidence. Mr. Y did not have a reasonable chance to respond to the allegations. The Ombudsman's investigation was affected by a scarcity of records, especially since there was no investigation plan or report produced.

The Ombudsman's recommendations included increased training to make sure managers doing workplace investigations have the skill and knowledge needed, a guide to follow for workplace investigations, and better record-keeping. She also recommended that only managers conduct investigations about employee performance. The City accepted all the recommendations.



WHEN THE WORK DOESN'T GET DONE

Stalling on street vendors

In May 2011 City Council set up a Street Food Working Group of internal and external stakeholders, based on a recommendation from senior staff of three divisions: Municipal Licensing and Standards (MLS), Economic Development and Culture, and Public Health. This group, chaired by MLS management staff, was to report back by the end of 2011 on harmonizing the patchwork of bylaws and finding ways for vendors to offer a range of food items beyond hotdogs and sausages.

By 2013, the Ombudsman was receiving complaints from the vending community because there was no report. That summer she decided to investigate.

The investigation found an unreasonable delay, and at some stages stakeholders did not have a fair opportunity to participate. Work began again in the spring of 2013 but then took more than a year. Some City staff were concerned about the focus on regulatory issues without addressing broader public policy issues, such as how to encourage diverse, affordable and accessible food options. Not all stakeholder consultations were documented. The information received during consultations was not shared on the website.

The Ombudsman intended to make recommendations aimed at ensuring effective tracking of Council and committee directions, detailed planning, monitoring of results, transparent consultations, and effective record-keeping practices. However, as the investigation was concluding, the working group was preparing the report and project management improvements were already underway. The Ombudsman wrote to the City Manager providing an overview of her findings and recommendations.



FIXING A MISTAKE WHEN YOU MAKE ONE

Smelly response to sewer failure

In July 2011 Toronto Water found that a section of a trunk sewer in the east end of the city was damaged and could collapse. A temporary bypass was installed until it could be repaired. The repair was to be completed by January 2012. Neighbouring residents started complaining about strong odours in and around their homes. The City repeatedly told them the problem was caused by their own internal plumbing systems, not by the City's repairs. In September, Toronto Water agreed to investigate the odour. The City did find that the activity in its temporary bypass was causing sewer odours to enter some of these homes. By late November Toronto Water had fixed the problem.

The two residents most affected by the problem then asked the City for compensation. They had incurred considerable cost in trying to identify the source of the odour in their homes, based on what the City had said. The City denied their claims.

Early in 2013 a Councillor asked the Ombudsman to investigate the City's response. Once the Ombudsman began preliminary inquiries, the City reconsidered the claims from the two residents and did provide partial compensation.

The investigation found the City provided incorrect information to the residents about the cause of the odour, initially resisted requests to investigate a connection with the repair activity, failed to share relevant information with residents and denied the compensation claims without proper review. Also, the information sharing procedures within 311 Toronto and Toronto Water did not allow the City to identify the cluster of related complaints as they were received.



DOG BITE LEADS TO IMPROVEMENTS AT ANIMAL SERVICES

Dealing with conflict of interest

In August 2012 Ms. O's seven-year-old daughter was bitten in the face by a dog that was being looked after by neighbours. She received 40 stitches. Ms. O thought the Animal Services investigation was flawed by excessive delays and a lack of professionalism. She was also concerned that Animal Services did not address a conflict of interest as one of the dog's owners was a veterinarian at the same workplace as the City's investigator.

Ms. O came to the Ombudsman. In December 2013 the Ombudsman issued a notice of investigation.

The investigation found the O family was not well served following the bite. Their interactions with Animal Services were fraught with excessive delay, a lack of clarity about the process, a failure to deal effectively with an apparent conflict of interest and an officer who made insensitive and unprofessional comments.

The investigation also found that Animal Services had made a number of commendable policy and procedural changes since the incident.

The Ombudsman's recommendations included increased training about existing policies and governing legislation as well as conflict of interest, adherence to record-keeping guidelines, a complaint handling protocol for Animal Services, and a written apology and explanation to Ms. O. The City agreed with all six recommendations, noting they would improve service.

PEOPLE'S

INTAKE STAFF, THE FIRST CONTACT FOR MOST PEOPLE WHO CALL THE OMBUDSMAN, OFTEN RESOLVE COMPLAINTS IN A FEW HOURS TO A FEW DAYS THROUGH PHONE CALLS, EMAILS AND INQUIRIES. INVESTIGATORS HANDLE THE MORE COMPLEX COMPLAINTS THAT INVOLVE RESEARCH INTO POLICY AND PRACTICE. THESE CASES TAKE LONGER.



1. DELAYS AFFECT NEIGHBOURLY PRIVACY

Ms. W's backyard patio was next to a Toronto Community Housing (TCH) parking lot. Because the video surveillance cameras in the TCH parking lot were pointed in the direction of her yard, she spent the summer of 2013 feeling like she was being constantly watched. She also thought surveillance cameras were needed in another nearby laneway next to the TCH property. With the help of her local Councillor, she complained to TCH who sent a supervisor from the Community Safety Unit to investigate. Despite the antisocial behaviour occurring in the laneway, TCH could not add cameras because they would violate the privacy of homes backing onto the TCH property. Ms. W pointed out that cameras were already installed in the TCH parking lot next to her home and directed at her backyard, bedroom window and kitchen.

Ms. W wrote to TCH to outline her concerns and suggest they meet with property owners in the area to discuss privacy issues and the use of cameras. TCH apologized for any error in communicating the findings of its investigation and agreed to send her questions for review and response. When Ms. W didn't hear back for six months, she contacted the Ombudsman.

We contacted TCH, who immediately wrote Ms. W to apologize for the delay. TCH told her the Community Safety Unit would assign a staff member to review the surveillance camera audit that had been done in response to her complaint. Shortly after, TCH met with Ms. W and she told us they were now responding to her concerns.



2. STOPPING PERCEIVED HARASSMENT

Mr. G lives in TCH. In the first two weeks of September he received three notices of entry from TCH staff. The last was not signed. The reasons for entry were to "help with the clutter." These notices must be signed by TCH staff with reasons and time of entry. Mr. G was concerned about the repeated attempts to enter his unit. Fire Services had inspected his unit in September and given him a notice describing what he had to do by October to remedy the build-up of clutter. He was working on it.

Mr. G phoned the Ombudsman. We contacted TCH and confirmed that all notices of entry should include the issuing staff member's name and signature. TCH agreed to refrain from sending further notices to Mr. G while he worked to resolve the clutter. They also reviewed the use of the notice of entry with managers.



3. RESOLVING A CATCH 22

In July 2010 Ms. N received a notice of infraction, left at her rental property by staff from Municipal Licensing and Standards (MLS). She called the inspector for an explanation of the notice. She was told the inspector and the supervisor were on vacation and she should file an objection. Since she did not know what she was objecting to, it was impossible to file an objection. No one in the office was authorized to tell her what the infraction was about.

Ms. N continued to leave messages but received no response. After almost 10 months she received another two charges. This time she was told what the charges were, and she paid the fines. In July 2012 she received yet another two infractions. This confused her and she spoke with a supervisor who directed her to a manager. Ms. N left a message and was contacted a month later. The manager said he would review the matter and call back but she never received the call. Ms. N received another notice, this time from Revenue Services, saying her taxes were overdue.

Ms. N phoned the Ombudsman. We advised her to pay the amount that was showing overdue to keep the matter from going to collections. After discussions with staff at MLS and Revenue Services, they found there was an overpayment and refunded \$425.



4. SYSTEM SOMETIMES JUST NEEDS AN EXTRA PUSH

Ms. Q went to Court Services in May 2008, to pay for a speeding ticket. In February 2011 she started to receive calls from a collection agency to pay "the outstanding fine." She checked her records and found the receipt had someone else's name and a different offence number. She also had her ticket with her name, and it was stamped "paid." She contacted Court Services but was unable to resolve the issue. She paid \$84 to avoid a bad credit rating and then called the Ombudsman.

We contacted Court Services who found they had made an error, keying the wrong ticket number into their system. They removed the

STORIES

case from the collection agency, credited the payment to the correct ticket number, and refunded the \$84 to Ms. Q.

Ms. Q asked for a letter from Court Services explaining the error in case her credit bureau report shows the unpaid amount. Court Services agreed.

5.



DESIRE TO PROTECT TREE WINS OUT, FINALLY

Mr. S's neighbour was adding onto his house. To do so, the neighbour received a permit from Urban Forestry to cut a portion of one of Mr. S's trees, which was close to the boundary. Mr. S, concerned about the permit conditions that were supposed to protect the tree and the neighbour's subsequent construction activity, talked to a manager at Urban Forestry. The manager gave lengthy replies that did not answer Mr. S's questions. Mr. S then wrote to the general manager, whose response also did not answer many of his questions.

His next step was the Ombudsman. We reviewed months of email correspondence and liaised with Mr. S and the manager. Eventually, after we met with the director of Urban Forestry and the manager, the director stepped in. The director read the Ombudsman investigator's review and met with Mr. S. The director said he would have done things differently if he had handled the complaint and offered deep-root fertilization for the tree, to look at the tree himself, and to have Urban Forestry monitor the health of the tree.

6.



CITY NEEDS TO PROVIDE THE INFORMATION

In April Ms. R applied to Transportation Services for a permit to repave her driveway. She received a verbal go-ahead for excavation, but an inspector came out and put a stop order on the work. The inspector told her she had to have a curb cut done and paid for before resuming work on the

driveway. Transportation Services employees redid the sidewalk and shortened the curb in compliance with the bylaw. Ms. R received an invoice for \$1,261, which she did not expect.

Ms. R could not understand why she had to pay. She was told that if she did not pay, the amount would be added to her property taxes. Ms. R called the Ombudsman.

We called the manager for Transportation Services, who said he would investigate. He said anyone wanting to change a curb must contact the Committee of Adjustment, which may or may not approve the application. No one had told Ms. R this. A supervisor met with Ms. R and then cancelled the invoice.

7.



TRYING TO HELP, BUT INADEQUATE RESULT

Mr. D is 70, recently blind due to glaucoma, and lives on his own. He came to the Ombudsman to complain about a bad hospital experience and some Toronto Community Housing matters.

We quickly learned he was unable to run errands independently such as grocery shopping or attending medical appointments. We tried to help by linking him with services such as a home delivery food bank, the Canadian National Institute for the Blind, medical home visits from a nearby community health centre, and supportive transportation services.

Unfortunately we hit systemic roadblocks. The home delivery food bank service deemed him ineligible because his income, though modest, exceeded the food bank cut off. Home visit services from the local community health centre were recently eliminated due to budget cuts, and he could not afford the supportive transportation services. We were able to help Mr. D navigate a complex system of social services, but in the end intervention was limited by obstacles outside of our jurisdiction.

8.



COMPLAINANT SOMETIMES HAS NO CASE

Mr. B was renting space for his community organization in a City-operated building. When the building management changed, the City had to re-evaluate the rent, which it did based on a previously incorrect survey of square footage and new common fees. The City told tenants to stop paying rent to the previous management while the new rents were being calculated. They reminded the tenants they would owe rent retroactively.

Mr. B disputed the increase in rent and said his organization was unable to pay the retroactive rent in a lump sum. He contacted the Ombudsman.

We looked at the detailed records of City correspondence. The records showed the City had made many efforts to get in touch with Mr. B to arrange a payment plan, but he did not reply. After months, they gave him a notice of termination. Mr. B asked for extensions on the lease, which the City granted.

Though the City ended up evicting Mr. B, City staff went to great lengths to accommodate him.

9.



NO WATER WITH NO EXPLANATION UNACCEPTABLE

In September residents of an east Toronto street went most of a day without water. They received no notice and so had no chance to prepare. One resident complained to the Ombudsman.

Toronto Water told us it was standard protocol for their staff to go door to door in advance to tell residents orally or in writing about pending water shut-offs. In this instance, they were responding to a water main break in the early hours and did not follow the notification protocol. Because it was an emergency, they could not give advance warning, but they should have gone door to door sometime during that day.

IMPROVING SERVICE

Toronto Water delivered a written apology to the residents for the failure to communicate. They sent a memo to operations staff reminding them of their responsibility to notify area businesses and residents prior to shutting off the water supply. As well, they told us about a new process they are developing to ensure communication is provided before any planned turn-off, which should be in place by early 2015.

10. **CROSSED WIRES LEAD TO INCORRECT FINES**

Ms. A has a street parking permit and has been parking in the designated area for more than five years. She started to receive parking tickets when an area resident phoned the parking authority to complain about trucks that were parked on the street.

Ms. A phoned the Parking Tags office and was told she could not park there. Staff in other divisions, including the permit office, told her she could park there.

Ms. A contacted staff at Transportation Services and they said the area did not have the proper signs and thus the parking enforcement officers were enforcing the three-hour limit. Transportation staff issued a letter for Ms. A to take to court about the improper signs and said they were arranging to have the proper signs installed.

Ms. A had seven parking tickets. Four were cancelled. The three remaining had already gone to convictions, and Ms. A was told that she would have to go to court for these.

The court date was in May 2015. Ms. A was concerned as she had to renew her driver's licence in April and would have to pay the \$133 in fines before she could renew her licence.

We called the Revenue Services supervisor for Parking Tag operations. She looked at the situation and said the parking tickets would be cancelled. The proper parking signs went up.

11. **AN APOLOGY IS IMPORTANT**

In May 2013 Mr. T complained to Toronto Community Housing (TCH) about harassment he experienced from a staff member. Dissatisfied with their investigation, Mr. T applied to the Landlord and Tenant Board, seeking an apology and compensation for pain and suffering. He was embroiled in litigation for several months. The board found Mr. T had indeed experienced harassment. However, although the board was able to award him monetary compensation, it could not order TCH to apologize. Mr. T continued to engage TCH in litigation. He wanted his apology.

Mr. T contacted the Ombudsman in October. We reviewed the information and told TCH an apology would be appropriate. The interim CEO agreed and promptly wrote a letter to Mr. T, apologizing on behalf of the housing provider for its inappropriate conduct.

12. **HELPING WHEN IT'S NOT IN OMBUDSMAN JURISDICTION**

A member of City staff (Ms. C) sent an anonymous email to the Ombudsman. Ms. C said there was a conflict of interest with a colleague who was running a business similar to the work he was doing for the City. This same colleague was sexually harassing staff who were too scared to complain to their supervisor. Ms. C had complained to the supervisor, but that only resulted in the colleague being moved to a different department. The harassment continued, only with different staff.

We replied, telling Ms. C that our office is one of last resort. Ms. C must first use other available complaint mechanisms before we have jurisdiction to investigate.

We suggested she consider a complaint to the Auditor General's fraud and waste hotline about her colleague running a business on the side. We also suggested she contact the City's Human Rights Office about her colleague harassing other staff or the union representative if the colleague's position was in the union.

13. **INSPECTION COMPLAINT LEADS TO BETTER PROCESS**

Ms. U, a superintendent for a building that rented short-term units, felt bullied and harassed by what should have been a routine fire inspection. She was feeling ill when inspectors arrived unannounced. She felt ignored when she asked to postpone the inspection. The inspectors said they were looking into a complaint of hoarding in two units but then went well beyond what she expected they would be examining, looking at other units, wiring, holes in the ceiling and smoke detectors. In their notice of violation, they even included an inoperable smoke detector, when if they had waited a few minutes, she would have replaced the battery. She complained to Toronto Fire Services (TFS) but was unhappy about the outcome.

Then she called the Ombudsman. She said that TFS failed to act on her complaint about the inspector in a timely way and failed to ensure a fair, full and unbiased investigation and decision.

TFS told us they could not establish exactly what happened that day or find any inappropriate behaviour. But they know their inspection process and compliance activities rely heavily on good public relations and agreed to write a letter to Ms. U to reassure her they had taken her complaint seriously and to describe changes they would make to ensure a more efficient and responsive process. They told Ms. U they would improve their complaints process and create a brochure for inspectors to give people at the door before an inspection. The brochure will explain the TFS's rights of entry, the rights of property owners and information about how to complain.

14. **TAKING EVERYTHING INTO ACCOUNT**

Ms. V, who lives on Ontario Disability Support Program (ODSP) benefits, had a difficult room-mate. When she began to feel her mental health was being affected, she decided to move and began searching for a new apartment. Finding a new place was difficult given her limited financial resources. She ended up using all her available money and borrowed from friends to cover the

ONE PERSON AT A TIME

rest needed for first and last month's rent. Her ODSF worker told her she could submit her new lease and apply to the city's Housing Stabilization Fund (HSF) for possible reimbursement of her last month's rent and other moving costs.

When she submitted her application to Toronto Employment and Social Services (TESS) she was denied because the last month's rent was already paid and she was not homeless. The decision was upheld on review. Ms. V was never told that paying her expenses upfront would prevent her from accessing funds. Ms. V came to the Ombudsman.

We reviewed the correspondence and the material that TESS used to describe the HSF program and its criteria. TESS agreed to speak with Ms. V and her community support worker to consider any new relevant information. TESS reversed its original decision, and Ms. V received the funds she applied for on the basis that her move was urgent because of a safety issue. TESS also agreed to work with the Ombudsman on making its decisions and website material easier to understand.

15. BETTER VISIBILITY FOR ACCESSIBLE PARKING SPOT

A group of citizens, including a local business owner, called the Ombudsman about a disabled loading zone in front of a music therapy centre that was not marked clearly enough. The required signs were present but the group felt strongly that the universal disability symbol should be painted on the ground so people understood clearly they could not park there. The group was concerned that many who parked there illegally did not see the existing signs. Staff at the music therapy centre had to police the spot to keep people from parking there. On occasion, Wheel-Trans could not drop off or pick up clients because the space was occupied. Sometimes people waiting for Wheel-Trans had to wait in the cold because someone was parked illegally.

We met with the group at the parking spot and spoke to Transportation Services several times. Transportation Services removed a tree that had interfered with the sign and agreed to place two vertical lines on the pavement to delineate the parking zone, but they did not want

to paint a disability sign on the road as they were concerned about a "flood gate" argument and consequent cost. Transportation Services wanted to hear whether the steps they had taken were useful to residents. Our office will monitor this.

16. TORONTO WATER DID IT RIGHT

In May Ms. P had a sewer back-up. She contacted Toronto Water, who came to inspect. They recommended she install a clean-out, which is part of a pipe used for cleaning or unclogging. Ms. P installed the clean-out. The blockage turned out to be in a shared private drain that ran across her backyard and several neighbouring backyards. A neighbour gave Ms. P a diagram showing the private drain. It was stamped "approved" in 1919 but had no other markings. Ms. P assessed the expense of fixing the blocked pipe and decided to connect her drain to the City's system. She asked the City for a reduction in the sewer connection fee and reimbursement for part of her repair costs. The City refused, as the blocked drain was on private property.

Ms. P called the Ombudsman. She thought the City should have known the drain was private, declared the blockage an emergency, responded more quickly and reimbursed a share of the cost. If she had known the drain was private, she would not have installed the clean-out.

We contacted City staff and the Ontario Ministry of the Environment and found that Toronto Water responded to Ms. P's initial call within 90 minutes. Environment staff visited the site and determined there was no health risk. The City had no copy of the diagram from 1919, and it was impossible to know its origin. At each step, City staff responded quickly and correctly. We sent a letter to Ms. P to outline why we would not investigate or recommend a reduction or reimbursement.

17. FITTING THE SOLUTION TO THE CIRCUMSTANCES

Mr. Z was one of the few remaining vendors under the A La Carte street food pilot project. This pilot project, whose aim was to improve the availability of healthy and culturally diverse foods, involved

eight vendors. In 2011 after a review the project was cancelled. Council directed that licence fees for these vendors be waived for 2011, 2012 and 2013 as they expected a healthy street food vending program in which these vendors could participate. This new program did not materialize. Mr. Z tried many times to find out from Municipal Licensing and Standards (MLS) what the fee and other requirements would be for 2014, to no avail. Mr. Z also wanted MLS to consider a reduced fee for 2014 based on the fact that A La Carte vendors had additional expenses, including the cost of moving the specialized cart and continuing to sell the specialized healthy menu.

Finally, Mr. Z called the Ombudsman. We asked MLS to consider his special circumstances. MLS did not have discretion to reduce the permit fee without Council's approval. However, they gave Mr. Z clear information in writing about the fees and other steps required to obtain a vending permit for 2014. MLS also agreed that, although Mr. Z's cart would exceed the footprint permitted in the public right of way, they would exempt him from this requirement. Mr. Z was in operation for the 2014 season.

18. EXPLAINING EXACTLY WHAT'S NEEDED

Mr. K had a water bill of just over \$3,000. The City tested his water meter and found it working. The inspector noted as possible explanations a leaking toilet and the filling of an above-ground pool. Mr. K insisted he had tested the toilet himself and found no leak and the pool filling could not account for the extreme bill. He and Revenue Services reached an impasse.

Then Mr. K came to the Ombudsman. A previous Ombudsman investigation into high water bills had led to a change in a bylaw. The City Treasurer now had the discretion to adjust a bill if there is a temporary, unusually high increase that cannot be explained. We told Mr. K about the bylaw's provisions so that he could present his information based on the criteria. Revenue Services agreed to meet with him to discuss the matter and make sure the Treasurer had all the information required.



ENGAGING COMMUNITIES

OMBUDSMAN WORK BEYOND INVESTIGATIONS

When not conducting formal investigations or being the last resort for a resident, the Ombudsman office mediates, explains and educates. As the office has become better known over the last five years, members of the public are using the services for less formal dispute resolution and problem solving. The office's involvement ranges from providing information, explaining things, practising shuttle diplomacy, mediating and finding other forms of resolution.

Interventions from the office can often even the playing field and resolve otherwise intractable problems.

During mediation, the office can bring the parties to an understanding about the positioning of their issue, for example, and how their neighbour thinks about it, and what the law says.

While more and more residents come to the Ombudsman, so do more elected representatives and public servants. They want to consult on thorny issues, seeking policy input and other advice. The Ombudsman's office provides information sessions about customer service and good governance to City divisions and agencies. Two such examples were the City Clerk's customer service summit and the Children's Services customer service improvement team. The advice sometimes crosses national borders. This year the Ombudsman hosted visiting delegations, including Taipei city government officials and public servants from the Chinese Ministry of Justice.

The Ombudsman regularly visits communities and organizations across the city. In 2014 she attended or spoke at many gatherings, including the Working Women Community Centre, Canadian Arab Institute, Working for Change, Urban Alliance on Race Relations, and Women's Legal Education and Action Fund. She addressed the graduation ceremony for Women Speak Out and was master of ceremonies on International Women's Day for an event held by the Canadian army.

She also speaks to professional groups. This year the Ombudsman attended the British Columbia Ombudsperson's 35th anniversary and conducted a training session on "Change Perspectives: Reflections on Ombuds in a changing landscape." She addressed AMCTO (association of Ontario municipal officers), the Ontario Municipal Tax and Revenue Association, the Ontario Bar Association and its Women Lawyers' Forum. The Director of Investigations presented "Making Regulatory Processes More Accountable and Transparent" at the annual meeting of the Society of Adjudicators and Regulators.

Both the Ombudsman and director were part of the teaching faculty for the joint Osgoode and Forum of Canadian Ombudsman certificate program. The Ombudsman also spoke to other groups including University of Toronto social work students at University College and students in the university's public policy program.



FIVE PUBLIC SERVANTS RECOGNIZED FOR OUTSTANDING SERVICE

At a September ceremony, five people received the Ombudsman's Public Service Award:

- Antoanela Culcearu, Operating Unit Manager, Toronto Community Housing Corporation
- Joe Magalhaes, District Manager, Investigation Services, Municipal Licensing and Standards
- Barry Randell, Director, Court Services
- Lynda Taschereau, Executive Director, Strategic and Corporate Policy, City Manager's Office
- Wendy Walberg, Practice Lead, Legal Services.

This award recognizes outstanding service in resolving claims of unfairness in the delivery of service by the City of Toronto. Nominations come from Ombudsman staff, city residents and stakeholders and reflect service provided in one or more of the following activities and may be awarded to an individual or group:

- demonstrating leadership in problem solving and good customer service
- initiating innovative approaches to dispute resolution
- encouraging the application of problem solving at a systems level
- providing exceptional responsiveness and cooperative service during a complaint inquiry or investigation.

The jury for the 2014 award was chaired by the Ombudsman and consisted of community, public service and business leaders.

- Sabina Ali, Project Coordinator, Thorncliffe Park Neighbourhood Women's Group
- Rahul Bhardwaj, President and CEO, Toronto Foundation
- Angela Coke, Associate Deputy Minister, Ontario Shared Services, Ministry of Government and Consumer Services
- Sheldon Levy, President and Vice-Chancellor, Ryerson University
- Susan McIsaac, President and CEO, United Way Toronto
- Carol Wilding, CEO, Toronto Board of Trade

INTERNATIONAL PROJECT SHOWS POSITIVE IMPACT OF OMBUDSMAN ON TORONTO'S PUBLIC SERVICE

The Toronto Ombudsman, in collaboration with Ryerson University, a North American advisory committee, and the Vienna-based International Ombudsman Institute, has completed a groundbreaking project. Starting with an independent study by researchers from Ryerson University about the impact of the Ombudsman on the Toronto Public Service, the Ryerson team and the Toronto Ombudsman developed an innovative guide for ombudsman to measure the impact of their work on the public administrations they serve.



They are here to help, they are not here to make you look bad. They are here to sift, point out weaknesses and you work together to mitigate those weaknesses... It's a huge benefit to have someone look at you critically and where you can improve.

- Director

The Ombudsman's office is basically to ensure fairness in any city interaction with its public... She's the champion of the average person on the street who has concerns.

- Division Head

The [Ombudsman is] there to champion the right of the public. [Her] staff are very, very good... They're coming with a purpose to try and make sure the taxpayer is treated fairly. It's trying to bring harmony, so that the city is responsive to these people.

- Director

TORONTO CASE STUDY FINDS SIGNIFICANT POSITIVE IMPACT

While there are clear benefits for residents who have their problems solved, the benefits for the day-to-day operations of public service, in any jurisdiction, are more difficult to recognize. Ombudsman work focuses on something inherently difficult to measure: fairness in the way that government treats its citizens.

Without traditional audits and statements of cost-savings, it has been difficult to evaluate the impact ombudsman have on public administration.

The Toronto study, based on in-depth interviews with senior public servants, was conducted by a team from Ryerson University, led by Dr. Myer Siemiatycki, Department of Politics and Public Administration, and Dr. Andrea Noack, Department of Sociology.

The findings were overwhelmingly positive. According to the public servants interviewed, the Toronto Ombudsman has improved public administration by “promoting a people-centred approach to government and advancing equity and fairness in the delivery of services to the public.”

The interviewees think the Ombudsman provides residents with a valued redress mechanism that allows for impartial and thorough review of public service processes and decisions. They also say the work of the Toronto Ombudsman has led to improved communication between the public service and the public.

One of the most significant impacts cited was the positive effect the Ombudsman has had on the treatment of residents with diminished mental and cognitive capacity.

Public servants also say the work of the Ombudsman has led to better co-ordination among divisions and brought positive change to the organization’s structure. Interviewees said the Ombudsman has brought a fresh, impartial perspective to bear on municipal procedures and practices. They emphasized the government-wide relevance and impact of Ombudsman investigations and recommendations. They also thought the presence of an ombudsman increased the commitment to public service excellence among staff.

Only a few described the office’s overall impact as minimal or negative. Some staff felt that the work of the Ombudsman has a potentially harmful impact on the morale and reputation of staff. Others felt the Ombudsman, at times, favoured the public over the public service in her investigations.

GUIDE TO CONDUCTING EVALUATION CREATED FOR OTHER OMBUDSMAN

Based on the experience of the Toronto study, the authors developed a guide and set of tools that can be adapted to evaluate the impact of ombudsman in different contexts. These tools will help ombudsman around the world understand how their work contributes to the promotion of fairness, good governance and a healthy democracy.

This project started when the Toronto Ombudsman noted that the International Ombudsman Institute provides grants for research projects. The idea of developing an evaluation tool leapt to mind, the search for partners began, and the project developed.

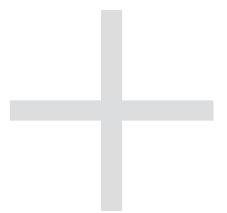
The publication, *The Impact of Ombudsman Investigations on Public Administration: A Case Study and an Evaluation Guide*, is available on the Ombudsman website at ombudstoronto.ca. It will also be available from the International Ombudsman Institute. The publication is available in English and French.

We are a large bureaucracy and powerful and it is good for the public to understand where to go [and] for the corporation to know to be accountable.

- Director

SIX THINGS TO KNOW ABOUT YOUR OMBUDSMAN

1. WE ARE INDEPENDENT
2. WE RESPECT YOUR CONFIDENTIALITY
3. WE LOOK INTO YOUR COMPLAINTS
4. WE ADVOCATE FOR FAIRNESS
5. WE ARE AN OFFICE OF LAST RESORT
6. WE OFFER INFORMATION SESSIONS



2.8
Million People

160+
Languages

140
Neighbourhoods

165+
City Organizations

WITHIN OUR SCOPE

- CHILD CARE
- ELECTRICITY
- ENVIRONMENT
- HOUSING
- LICENSING AND STANDARDS
- LONG-TERM CARE
- PARKS, FORESTRY AND RECREATION
- PERMITS
- PUBLIC HEALTH
- SOCIAL SERVICES
- TAXATION
- TRANSPORTATION
- WATER

COMPLAINT INCREASE

From 2009 to 2014

1209%

THE STORY IN NUMBERS

1 TO SUM UP

The Office of the Ombudsman handled 2,230 complaints in 2014, a 22 per cent increase over 2013. Five investigations were completed, of which three were systemic. Thirty-five complaints were carried over to 2015, of which five are investigations.

Four of the five most common issues were the same as last year: poor communication; inadequate, poor or denied service; wrong, unreasonable or unfair decisions; and unfair enforcement. The new one, inconsistent adherence to or unfair policies and procedures, stems from a large number of complaints about a parks permit.

Nearly 51 per cent of the complaints related to poor communication. This included unreasonably long response times, telephone calls not returned, and hard-to-understand written communications. While still the most common issue faced by complainants, this is a welcome downturn after 2013, which was at approximately 70 per cent.

The 10 areas most complained about remain similar to previous years. Toronto Community Housing (TCH) received the most. Parks, Forestry and Recreation and Municipal Licensing and Standards (MLS) were second and third. For the second time, Revenue Services did not appear in the top three—it was fourth. Only one division—Corporate Finance—was new to the top 10, while Shelter, Support and Housing Administration dropped off the list.

Many TCH complaints were about poor or delayed maintenance and substandard or unsafe living conditions, with everything from pests to deteriorating infrastructure. A number of complaints related to disputes over rent. Others took issue with long wait lists and delays in the transfer system. We received a number of complaints about hiring and human resources practices, which was the subject of an investigation. Staff conduct and customer service were also the source of many complaints. A small number of complaints related to concerns over eviction.

Parks, Forestry and Recreation received a large number of complaints compared to previous years, but more than

two thirds were about a parks permit for an event. This issue is currently part of an investigation into red tape and therefore no determination has yet been made about its outcome.

Most MLS complaints were about inconsistent or unfair enforcement of bylaws. Many involved disputes between neighbours, with issues ranging from the height of a fence to downspout drainage. There were also a number of complaints about staff conduct and customer service.

Revenue Services is responsible for issuing bills and collecting money, so it is unsurprising that it generates complaints from the public. Many were about high water bills. A number related to incorrectly-issued parking tickets and ongoing problems with the process for disputing them. Another common theme was disagreement over property tax bills.

Data showed moderate growth in complaints from Toronto and East York as well as Etobicoke, and low growth in Scarborough. There was a slight decline in complaints from North York. Overall, the proportion originating from each quadrant has remained constant for the last four years, with nearly twice as many from Toronto and East York compared to the other quadrants.

The Ombudsman received 21 complaints about its own services. Fourteen were about our investigation into human resource practices at TCH. They ranged from complaints about the Ombudsman's bias towards the senior executives of the corporation to a defence of Mayor Ford's position about the CEO. None of these complaints was about the facts or evidence. Five of the remaining complaints were racist, inflammatory and offensive towards Ombudsman staff.

One resident complained about the internet complaint form timing out after 90 minutes but then abandoned her complaint despite several attempts to take her complaint by other means. One other resident wanted to know who to complain to about the Ombudsman's decision. He was referred to the City Clerk who could then lay the complaint before City Council. No complaint came forward.

2

TOP 10

- CORPORATE FINANCE
- EMPLOYMENT & SOCIAL SERVICES
- MUNICIPAL LICENSING & STANDARDS
- PARKS, FORESTRY & RECREATION
- REVENUE SERVICES
- TORONTO BUILDING
- TORONTO COMMUNITY HOUSING CORPORATION
- TORONTO TRANSIT COMMISSION
- TORONTO WATER
- TRANSPORTATION SERVICES

3

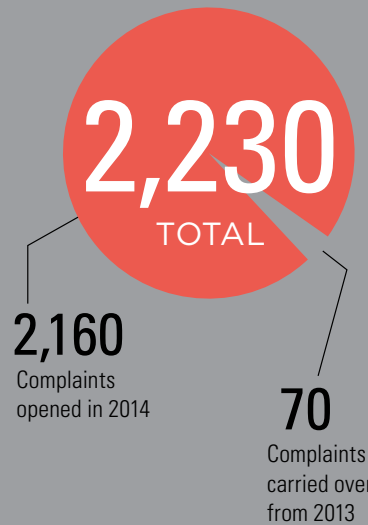
COMPLAINT SUMMARY

CLOSED IN 2014

Complaints	2,190
Investigations	5
	2,195

CARRIED INTO 2015

Complaints	30
Investigations	5
	35

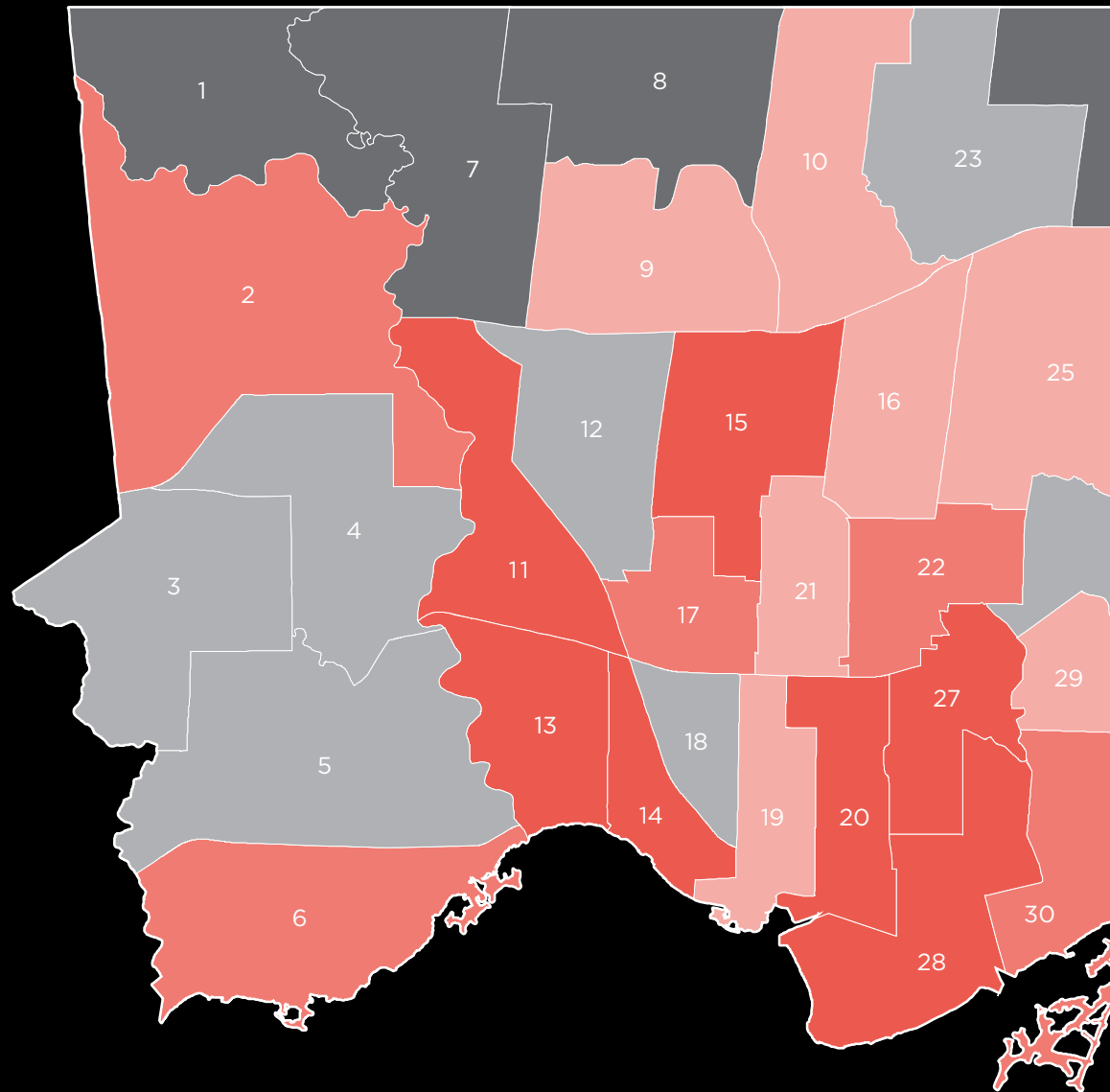


4

CASE CATEGORIES TOP 5 FAIRNESS STANDARDS

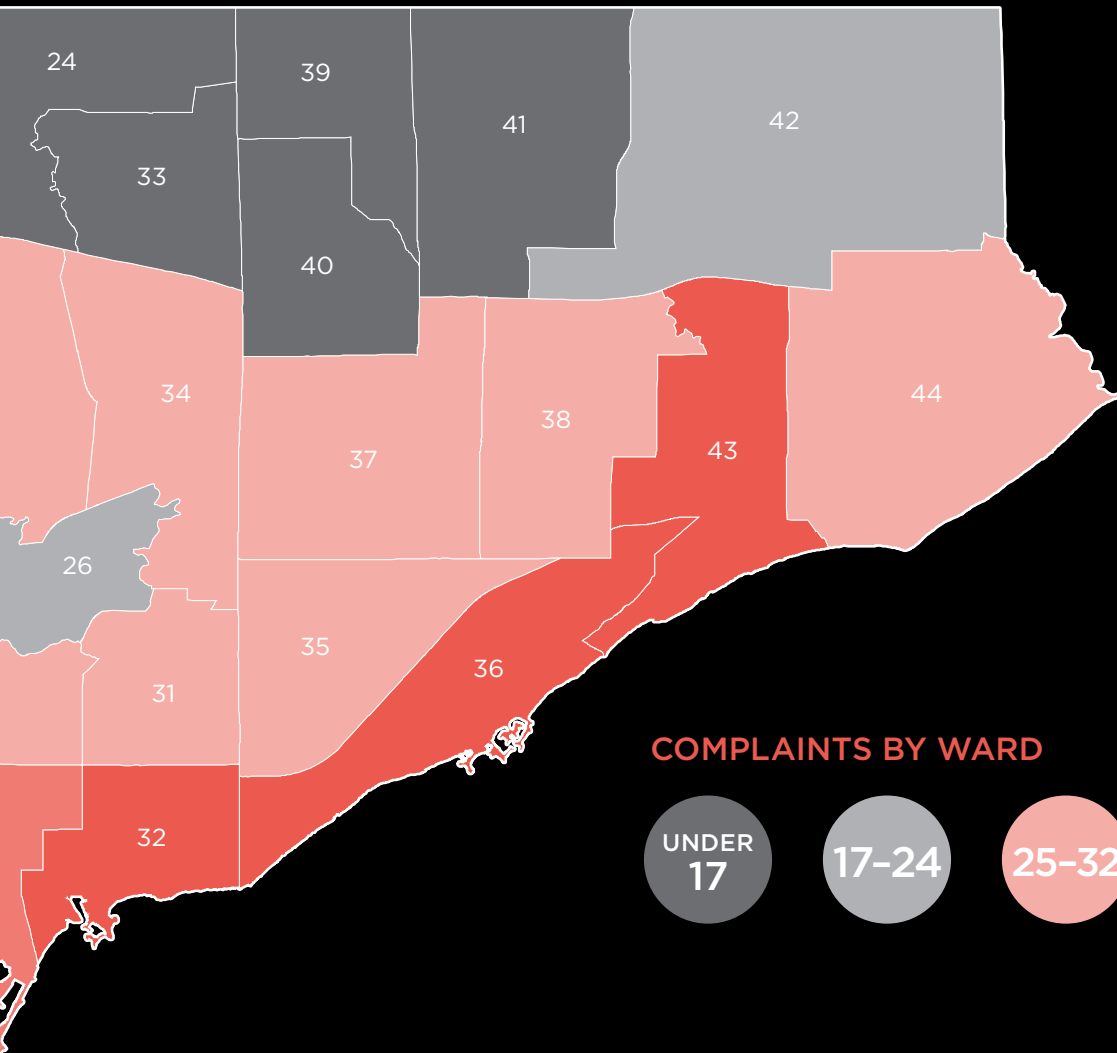
- 1. COMMUNICATION INADEQUATE, IMPROPER OR NONE**
- 2. DENIAL OR LACK OF SERVICES; INADEQUATE OR POOR SERVICE**
- 3. FAILURE TO ADHERE TO OR CONSISTENTLY APPLY POLICIES, PROCEDURES OR GUIDELINES; UNFAIR POLICIES OR PROCEDURES**
- 4. DECISION WRONG, UNREASONABLE OR UNFAIR**
- 5. UNFAIR ENFORCEMENT OR FAILURE TO ENFORCE**

CITY WARDS



WARD LISTING

- | | | |
|------------------------|-----------------------------|-----------------------------|
| 1. Etobicoke North | 15. Eglinton-Lawrence | 30. Toronto-Danforth |
| 2. Etobicoke North | 16. Eglinton-Lawrence | 31. Beaches-East York |
| 3. Etobicoke Centre | 17. Davenport | 32. Beaches-East York |
| 4. Etobicoke Centre | 18. Davenport | 33. Don Valley East |
| 5. Etobicoke-Lakeshore | 19. Trinity-Spadina | 34. Don Valley East |
| 6. Etobicoke-Lakeshore | 20. Trinity-Spadina | 35. Scarborough Southwest |
| 7. York West | 21. St. Paul's | 36. Scarborough Southwest |
| 8. York West | 22. St. Paul's | 37. Scarborough Centre |
| 9. York Centre | 23. Willowdale | 38. Scarborough Centre |
| 10. York Centre | 24. Willowdale | 39. Scarborough-Agincourt |
| 11. York South-Weston | 25. Don Valley West | 40. Scarborough-Agincourt |
| 12. York South-Weston | 26. Don Valley West | 41. Scarborough-Rouge River |
| 13. Parkdale-High Park | 27. Toronto Centre-Rosedale | 42. Scarborough-Rouge River |
| 14. Parkdale-High Park | 28. Toronto Centre-Rosedale | 43. Scarborough East |
| | 29. Toronto-Danforth | 44. Scarborough East |

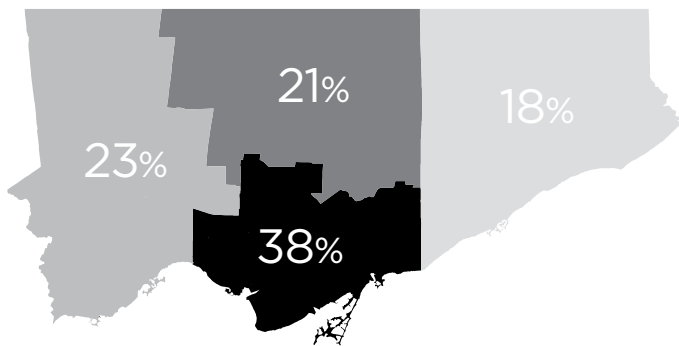


COMPLAINTS BY WARD

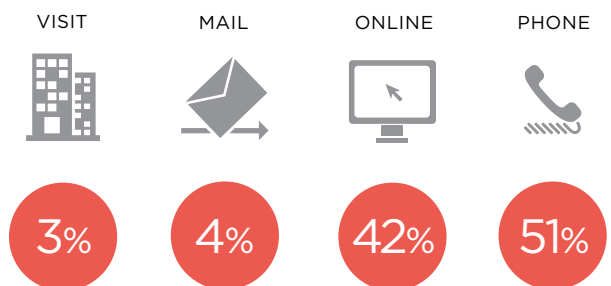


TORONTO

COMPLAINTS BY QUADRANT



HOW PEOPLE CONTACT US



FINANCIALS

2014 BUDGET

In 2014 the Office of the Ombudsman budget allocation approved by City Council was \$1.636 million for the operating year ending December 31, 2014.

2013 EXTERNAL AUDIT

Hillborne Ellis Grant, an external audit firm, performed a successful compliance audit for the fiscal year ending December 31, 2013, a full copy of which is available on the website at ombudstoronto.ca.

OMBUDSMAN & STAFF

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Ombudsman
Investigator

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Ombudsman

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LAUREN HOLLYWOOD
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Assistant

ZALINA DEODAT
Ombudsman
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APRIL LIM
Research and
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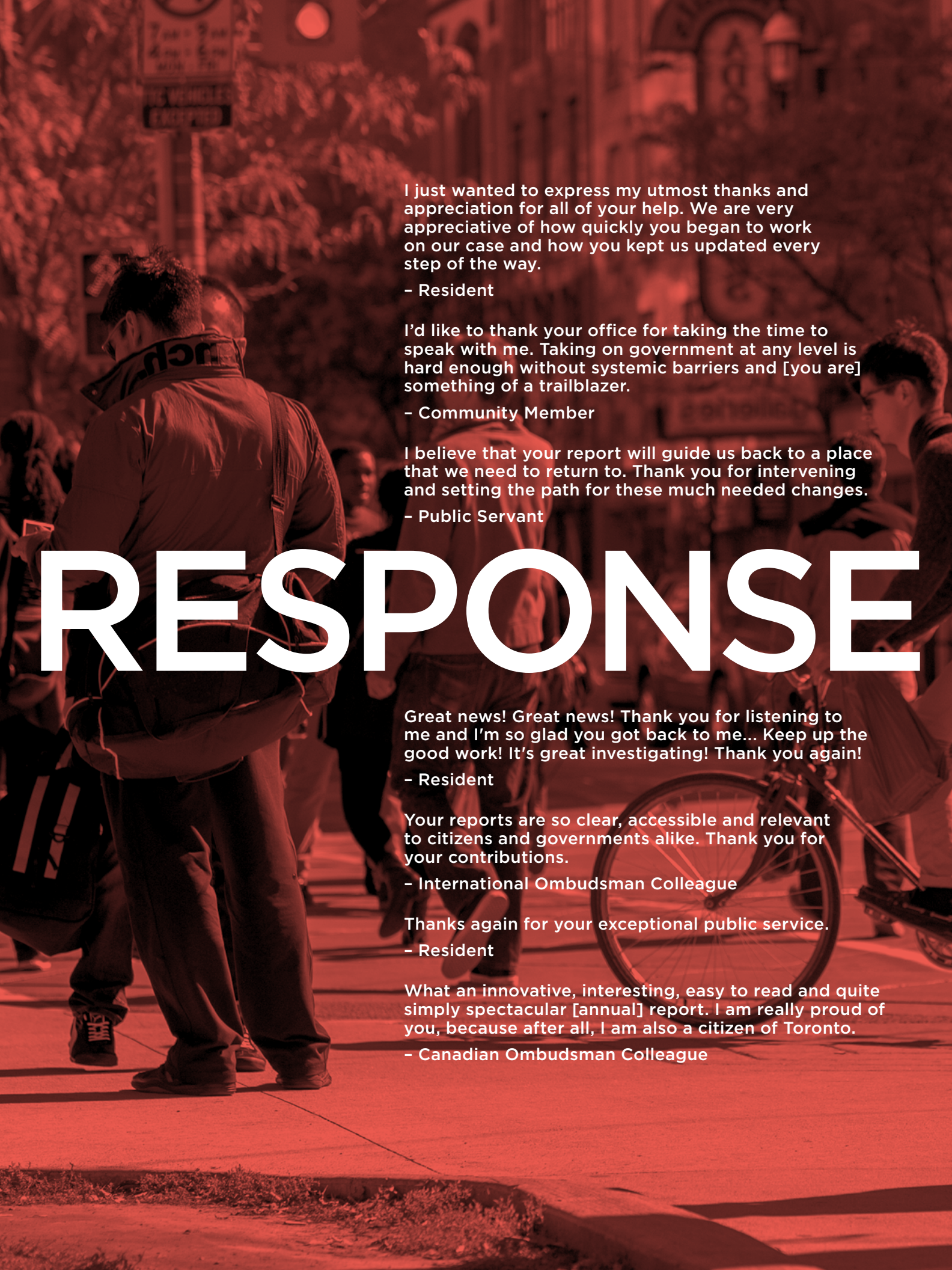
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Ombudsman
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JACKIE CORREIA
Ombudsman
Representative

KWAME ADDO
Director, Investigations
and Conflict Resolution

SHOSHANNA LEVITT
Ombudsman
Investigator





I just wanted to express my utmost thanks and appreciation for all of your help. We are very appreciative of how quickly you began to work on our case and how you kept us updated every step of the way.

- Resident

I'd like to thank your office for taking the time to speak with me. Taking on government at any level is hard enough without systemic barriers and [you are] something of a trailblazer.

- Community Member

I believe that your report will guide us back to a place that we need to return to. Thank you for intervening and setting the path for these much needed changes.

- Public Servant

RESPONSE

Great news! Great news! Thank you for listening to me and I'm so glad you got back to me... Keep up the good work! It's great investigating! Thank you again!

- Resident

Your reports are so clear, accessible and relevant to citizens and governments alike. Thank you for your contributions.

- International Ombudsman Colleague

Thanks again for your exceptional public service.

- Resident

What an innovative, interesting, easy to read and quite simply spectacular [annual] report. I am really proud of you, because after all, I am also a citizen of Toronto.

- Canadian Ombudsman Colleague

THANKS FOR
YOUR PASSION,
COMPASSION
AND SUPERIOR
OVERSIGHT
YOU AND YOUR
OFFICE PROVIDE.

- RESIDENT

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