

November 20th, 2019

Planning and Housing Committee

Written Deputation to:

Subcommittee on the Protection of Affordable Rental Housing

RH2.1 Promoting the Security of Residential Rental Tenancies

Dear members of the Subcommittee on the Protection of Affordable Rental Housing. Please accept the following as Dixon Hall's submission on **item RH2.1 Promoting the Security of Residential rental tenancies**.

We are fully in support of the Subcommittee's focus on mechanisms used by certain landlords to facilitate illegal evictions. We also welcome the recognition by the City that increased real estate prices and rents are leading many landlords to utilize predatory practices to gain vacant possession of units which, not subject to rent control, can be then offered to subsequent tenants at a much higher rent.

The focus of the subcommittee, however, on N12 and N13 evictions, is too narrow and should include predatory practices in general. In many instances for example, N11's, Agreements to Leave, are signed by clients without being fully informed of their legal rights when landlords are attempting to gain vacant possession. There are a large number of predatory practices utilized by certain landlords that need to be taken into consideration.

Moreover, this narrow scope on the use of N12's and N13's to gain vacant possession of a single unit to increase the rent for subsequent tenants can miss predatory practices that are focused on the whole property and not merely individual clients and units. With this broadened scope for the subcommittee, we suggest that mechanisms be put in place to identify at risk properties, develop a training module for front line workers to identify and support "whole house issues", provide coordinated supports to all tenants at the identified properties and build in programs such as a Small Site Acquisition Program where the Municipality supports community agencies to purchase at risk rental properties.

As such, Recommendation 1.c in the staff report RH2.1 promoting the Security of Residential Tenancies which recommends "potential mechanisms and data sources to track and monitor data on N12 and N13 evictions" should be amended to include predatory landlord behaviour and other indications that a property is at risk for conversion, renovation and speculation.



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Information for this data base can be gotten through different city departments, tenant complaints to 311, Housing workers, Rooming House Emergency Response program etc. This information can be compared to a baseline property risk assessment which would then trigger a coordinated response.

Identifying at risk properties allows for proactive, coordinated eviction prevention responses with the goal of supporting tenants to remain in place and to sustain the property as affordable housing.

To do so effectively, Housing Workers require training to identify and report issues that that may destabilize the housing of all tenants and lead to the loss of the affordable housing in question. We therefore suggest that recommendation 3.c “the hosting of an affordable rental housing workshop to address the issue of tenant displacement and evictions, including solutions” be amended to include the development of a training module for front-line workers that focuses on issues that affect all tenant’s housing stability and security.

Finally, Dixon Hall strongly supports the development of a Small Sites Acquisition program. Identifying at risk properties proactively, provides the City with opportunities to support engagement between private landlords and community agencies. Supporting this process guarantees that properties remain affordable in perpetuity and tenants receive ongoing supports and services.

Dixon Hall strongly supports the direction of the Subcommittee on the Protection of Affordable Housing and feels that the work of the subcommittee will be strengthened by implementing the recommendations noted above. We look forward to working together to continue protecting the City of Toronto’s Affordable Housing stock and working with the committee to implement it’s recommendations.

Regards,
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