



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

**22 September 2020**

**Deputation – Planning and Housing Committee**

**Item 16.5 – Improving Outcomes for Toronto Residents through Implementation of HousingTO 2020-2030**

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

My name is Jonathan Robart. I am the Senior Advisor for Policy, Litigation & Law Reform at CERA –the Centre for Equality Rights in Accommodation. CERA has been working to advance the right to housing and progressive housing policy in Toronto and Ontario for over 30 years. We have also stood on the frontlines of eviction prevention in Toronto and have worked tirelessly to prevent people from losing their homes.

I want to begin by acknowledging the incredible work and resilience of City staff in preparing the Implementation Plan, especially given the unique challenges that have arisen during the COVID-19 pandemic. Thank you.

CERA is pleased to see that the Implementation Plan prioritizes the City's commitment to the progressive realization of the Right to Housing, as outlined in the HousingTO Plan and the revised Toronto Housing Charter. We are thrilled to see that the framing of housing as a human right and its progressive realization in Toronto is becoming increasingly embedded throughout City policies and planning.

CERA is also pleased to see the Implementation Plan recognizes the diverse housing needs of Indigenous communities, TCHC residents, Women and Seniors, among others, and has committed to addressing these needs through a diverse range of policies and programs across the full housing spectrum. Along the same lines, we applaud the clear focus within the Implementation Plan on addressing discrimination in housing.

CERA agrees with the need to focus on preventing homelessness by preventing evictions and strongly supports the stated goal of preventing 10,000 evictions for low-income households.

Finally, we are pleased to see that the above policies and priorities are grounded in a commitment to accountability and transparency, including on how the HousingTO plan is being implemented and its impact on residents.

CERA has the following two recommendations for your consideration.

Successful implementation of the HousingTO Plan will require ongoing monitoring, tracking and reporting of clear goals to ensure transparency and accountability. An independent and well-resourced Office of the Housing Commissioner can ensure correct measures are in place, targets are met, and recommendations are made to guide sustainable and effective housing policy. CERA

shares the conclusion reached by the Implementation Plan that a Housing Commissioner is the most effective tool to ensure transparency and accountability, and a centrepiece of the City's commitment to the progressive realization of the Right to Housing.

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 security and wellbeing of all citizens of Toronto. Moving forward, a Housing Commissioner would ensure accountability, transparency and action towards finding effective rights-based solutions to the pressing issues that have arisen due to COVID-19 and lessen the negative impacts of future pandemics.

CERA strongly recommends the City establish and implement the Office of the Housing Commissioner and the Housing Commissioner role without further delay. We note that clear timelines, targets, and guidelines to establish an Office of the Housing Commissioner were not included in the Implementation Plan. Given that the Implementation Plan, in its current form, is a "living document" we look forward to the City putting forward these targets, timelines, and guidelines for the establishment of the Office of Housing Commissioner in the immediate future.

Our second recommendation is with reference to the Implementation Plan's stated goals of:

- providing 18,000 affordable and supportive housing opportunities;
- creation of 600 units of supportive housing annually; and
- preventing 10,000 evictions for low-income households

It is critical that the City recognizes the interdependence and mutual relationship between these goals.

Over the past decade, CERA has watched as the circumstances of people who call our eviction prevention hotline have become progressively complex, urgent, and desperate. Each month, CERA typically fields between 80-90 inquiries from tenants facing eviction and requiring support. This month, CERA is on pace to double the number of inquiries and field over 160 requests for eviction prevention support from tenants. The recent lifting of the moratorium on residential evictions and passage of Bill 184 by the Ontario Government and the subsequent restarting of enforcement of eviction orders has placed thousands of Toronto tenants at immediate risk of eviction.

CERA is deeply concerned that any potential gains in affordable and supportive housing opportunities will be quickly erased without immediate, sustained and increased investment in eviction prevention programs that keep people in their homes. CERA is urging the City to confront, right now, the very real eviction crisis facing tenants across Toronto and consider an immediate and increased investment in eviction prevention resources during the upcoming budget cycle. We cannot wait a decade for the laudable goals of eviction prevention outlined in the Implementation Plan to be fully realized.

I want to end by commending the leadership this Committee has shown in supporting the progressive realization right to housing and I again want to recognize the incredible work of staff in putting together this Implementation Plan.

The lack of safe, affordable and adequate housing is one of the greatest human rights challenges of our time. Today, this Committee can transformational progress towards meeting that challenge by adopting this plan and I urge you to do so.

Sincerely,

Jonathan Robart – Senior Advisor for Policy, Litigation & Law Reform

On Behalf of the Centre for Equality Rights in Accommodation