

Actions to Promote the Protection of Residential Rental Tenancies - Update

Date: September 10, 2020

To: Subcommittee on the Protection of Affordable Rental Housing

From: Executive Director, Housing Secretariat

Wards: All

SUMMARY

This report provides an update on the work undertaken by City staff and the Advisory Committee on the Protection of Affordable Rental Housing. It responds to the November 20, 2019 directives from the Sub-Committee on the Protection of Affordable Rental Housing. Specifically it makes recommendations on how to: improve tenant communications; enhance existing City eviction prevention programs; and enhance data collection and analysis. The report also responds to specific questions related to Toronto Building, City Planning and City Legal.

RECOMMENDATIONS

The Executive Director, Housing Secretariat recommends that:

1. The Planning and Housing Committee request the Executive Director, Housing Secretariat report back to a November 2020 Sub-Committee on the Protection of Affordable Rental Housing meeting on progress made by the Interdivisional Staff Working Group to improve internal practices to help address potential illegitimate evictions, potential investigation functions and responses.
2. The Planning and Housing Committee request the Executive Director, Housing Secretariat report back to a November 2020 Sub-Committee on the Protection of Affordable Rental Housing with a revised terms of reference and expanded mandate of the Advisory Committee on the Protection of Affordable Rental Housing to provide advice on all City related tenancy matters and transition to become the Tenant Advisory Council as called for in the HousingTO 2020-2030 Action Plan.
3. The Planning and Housing Committee request the Executive Director, Housing Secretariat to explore opportunities to improve customer-service as it relates to tenant information and services provided across City divisions.

4. The Planning and Housing Committee request the Executive Director, Housing Secretariat, in consultation with the Chief Communications Officer, Strategic Communications and the Customer Experience Transformation and Innovation (CXi) team develop a website maintenance plan for the new tenant portal; implement Phase 1 of the Communication Framework by October 31, 2020; and present options for the implementation of Phase 2 at a November 2020 Sub-Committee on the Protection of Affordable Rental Housing meeting.
5. The Planning and Housing Committee direct the General Manager, Shelter, Support and Housing Administration, to identify short-term opportunities to align the Tenant Support Grant program, and its associated Municipal Code Chapter 797, with current market conditions, including updating administrative requirements to mitigate challenges presented by the COVID-19 pandemic, and report back to a November 2020 meeting of the Sub-Committee on the Protection of Affordable Rental Housing to facilitate implementation of short-term program changes in January 2021.
6. The Planning and Housing Committee direct the General Manager, Shelter, Support and Housing Administration, to examine opportunities to align, over the intermediate- and long-term, existing programs for tenants in the private market with current market conditions, and to report back to the Sub-Committee on the Protection of Affordable Rental Housing in the second quarter of 2021 on proposed program changes, and the cost of implementing such changes.
7. The Planning and Housing Committee direct the General Manager, Shelter, Support and Housing Administration, to review and update, as required, current City of Toronto web content related to the Rent Bank program, the Eviction Prevention in the Community (EPIC) program and the Tenant Defence Fund and Tenant Hotline programs, and include information on how tenants can access each program.
8. The Planning and Housing Committee request the Executive Director, Housing Secretariat to explore opportunities to improve data collection and analysis capacity and coordination as it relates to protecting affordable rental housing in consultation with external organizations and community agencies and tenant-led organizations.
9. The Planning and Housing Committee request the Executive Director, Housing Secretariat request a Data Sharing Agreement between the City of Toronto and the Landlord and Tenant Board to facilitate regular information sharing on evictions, above guideline increases and other tenancy-related data.
10. The Planning and Housing Committee request the Executive Director, Housing Secretariat work with the Chief Building Official and Executive Director, Toronto Building to develop an assessment tool that will guide staff in determining work which may legitimately result in the need for the tenant to vacate a property either temporarily or permanently, and subsequently to develop educational materials to advise landlords and tenants of their rights and responsibilities under provincial legislation.

FINANCIAL IMPACT

There are no financial implications arising from this report. The Chief Financial Officer and Treasurer has reviewed this report and agrees with the financial impact information.

EQUITY IMPACT STATEMENT

The HousingTO 2020-2030 Action Plan envisions a city in which all residents have equal opportunity to develop to their full potential. The HousingTO 2020-2030 Action Plan is also centred on a human rights based approach to housing. This human rights based approach recognizes that housing is essential to the inherent dignity and well-being of a person and to building inclusive, healthy, sustainable and liveable communities. One of the guiding principles to a human rights based approach outlined in the updated Toronto Housing Charter states that "All residents have a right to a safe, secure, affordable home in which they can live in peace and dignity and realize their full potential". This report makes recommendations to improve tenant communications, eviction prevention programs and City processes to help tenants stay in their homes.

DECISION HISTORY

On December 10, 2019 the Planning and Housing Committee adopted a report that called for the creation of a Protection of Affordable Rental Housing Advisory to, among other actions, develop positions related to the Residential Tenancies Act, 2006 to address illegitimate N12 and N13 notices. Additionally the recommendations included exploring the potential to explore criminal charges for fraudulent activities illegitimate evictions <http://app.toronto.ca/tmmis/viewAgendaItemHistory.do?item=2019.PH11.11>

On February 19, 2020 City Council requested the Executive Director, Housing Secretariat and the General Manager, Shelter Support and Housing Administration to identify appropriate City actions and any new resources and/or budget adjustments needed to respond to renovations and ways to improve housing stability for renters. <http://app.toronto.ca/tmmis/viewAgendaItemHistory.do?item=2020.EX13.2>

At its meeting of July 28 and 29, 2020 adopted the City's Submission on Bill 184, *Protecting Tenants and Strengthening Community Housing Act, 2020*. This submission was informed by the Advisory Committee on the Protection of Affordable Rental Housing as well as by the approximately 50 deputations at the November 20, 2019 meeting of the Sub-Committee on the Protection of Affordable Rental Housing. <http://app.toronto.ca/tmmis/viewAgendaItemHistory.do?item=2020.PH15.10>

COMMENTS

Following the adoption of the recommendations of the Sub-Committee on the Protection of Affordable Rental Housing (the "Committee") at the December 10, 2019 Planning and Housing Committee, staff began to meet with the goal of completing the work by the

end of Q1 2020. In consultation with a newly created Advisory Committee on the Protection of Affordable Rental Housing (the "Advisory Committee"), staff were tasked with improving tenant communications on rights and responsibilities; proposing improvements to City programs to help tenants facing evictions; advocating for changes to the provincial Residential Tenancies Act 2006 (RTA) and processes at the Landlord and Tenant Board (LTB); and developing a tenant workshop.

In addition to the above recommendations, the Committee also asked staff to report back on: improvements to City processes to address potential illegitimate evictions; the collection of robust data to track eviction and rental market trends; measures from Toronto Building to improve information to landlords and tenants about illegitimate evictions; measures to protect tenants in buildings with less than six units; and information on potential fraud charges for those that have knowingly illegitimately evicted tenants.

Work began in earnest on all these measures with the intent of key deliverables by the end of Q1 2020. Unfortunately with the arrival of COVID-19 in mid-March some of the deliverables have been delayed. Many of the staff working group members were redeployed or directed to undertake new priority work to assist with the COVID-19 response and recovery. The following sections highlight work undertaken to date and proposed next steps to implement the recommendations from the Planning and Housing Committee.

Establishment of an Interdivisional Staff Working Group

On December 19, 2019 the City's Housing Lead Committee - chaired by Deputy City Manager of Community and Social Services Giuliana Carbone, and comprised of senior leadership from across City divisions and agencies - discussed the recommendations of Planning and Housing Committee. Senior leadership was directed to assign staff to the working group with additional divisions being added as required. The Interdivisional Staff Working Group (the "Staff Working Group") is comprised of staff from:

- Housing Secretariat
- Shelter, Support & Housing Administration
- Seniors Services & Long-Term Care
- Toronto Building
- City Planning
- Municipal Licensing & Standards
- Social Development, Finance & Administration (SDF) Social Research & Information Management
- Social Development, Finance & Administration (SDF) Tower Renewal
- City Legal

Unfortunately, progress toward implementing Committee's requests has been slower than anticipated in light of COVID-19 and staff redeployments. Work undertaken to date includes: mapping existing City policies, programs and processes that touch on evictions and tenant rights; the formation of working groups to improve tenant communications and City enforcement mechanisms; research on best practices from other jurisdictions; and preliminary discussions on how to improve data collection across

City divisions and service areas. Working Group members also participated in meetings with the Advisory Committee on the Protection of Rental Housing - both the tenant and landlord groups.

As most staff have now returned to their base positions, recommendations on improved internal practices and data collection to forecast illegitimate evictions will be made to the Committee by the end of Q4 2020. The City's work on the Protection on Affordable Rental Housing has been a standing item on the City's Housing Lead Committee agendas throughout 2020 resulting in collaboration across the City.

Advice from the Advisory Committee on the Protection of Affordable Rental Housing

On December 20, 2019 the City put out a public call for interested individuals, organizations and landlords to apply to serve on an Advisory Committee on the Protection of Affordable Rental Housing. The call was posted on the City's website, social media channels and sent to key networks by numerous City divisions. The deadline to apply was January 17, 2020. The City received 51 applications from individuals, organizations and property owners wishing to serve on the Advisory Committee. Advisory Committee members were selected to ensure balance between people with lived experience tenant advocacy groups, legal clinics and landlords. Members were also sought from all parts of the City. It was decided to proceed with two separate groups - one comprised of landlords (the "Property Owner Group") and one with tenants, tenant advocacy groups and legal clinics (the "Advisory Group"). Attachment 1 provides a list of the Advisory Committee members.

The Advisory Committee met in person twice before March 17, 2020, and the Property Owner Group met in person once. Since March 17, engagement has continued through email, conference calls and web meetings to discuss issues within the mandate. With the arrival of the COVID-19 pandemic, however, the groups proved instrumental in providing the City with information in real-time on the impact of the pandemic on renters. The Advisory Committee raised issues such as: tenants' inability to pay rent; challenges with physical distancing in buildings; discrimination and harassment experienced by some tenants; and a general lack of access to information. Staff used this insight to develop a specific housing section on the City's COVID-19 webpage, inform communications sent to landlords and propose by-law changes. Additionally the information was used to help shape some of the recommendations in the recently released Housing and People Action Plan.

Both the Advisory Committee and the Property Owner Group provided the following feedback and advice related to tenant communications, improving City programs related to evictions, provincial advocacy related to tenant issues, the development of a tenant workshop and the future role of the Advisory Committee. A summary of feedback is provided below and additional information is available in Attachment 2.

Communications on Tenant Rights and Responsibilities

It was recommended that City communications on tenant rights and responsibilities be presented in plain language, with limited separation of information owned by different

Divisions, but clear delineation of information within the Province's jurisdiction. Information should be available in multiple channels and kept consistently up to date. Additionally, information on access to and eligibility for City programs and supports for renters should be available in one location, easily understandable and kept up to date.

The Advisory Committee recommendations for potential programming:

- Fund networks of people with lived experience of exercising tenant rights, and community tenant committees and neighbourhood hubs, to actively provide information on tenant rights, and support advocacy efforts.
- Provide more information, training and resources to established organizations and groups that are supporting tenants.
- Provide information and resources to landlords on available programs and supports that may be available to their tenants.

Improvements to City Programs to Help Tenants Facing Evictions

The Advisory Committee stated that City programs for renters should be more widely available, meaning existing programs should have open referral processes, broader eligibility criteria, and higher funding levels to meet increased demand. There are also not enough programs and supports for tenants, considering the number of renters in Toronto.

The Advisory Committee suggested "one-stop-shop" models where possible, as it can be difficult to identify which program is the best fit to address any particular issue. To this end, one centralized listing of programs is important to facilitate self-assessment of eligibility.

Advocating for Changes to the Provincial Residential Tenancies Act, 2006

In March 2020 the Province introduced Bill 184, *Protecting Tenants and Strengthening Community Housing Act, 2020*, which provided the opportunity to formally present City comments on the RTA. Both the Advisory Committee and the Property Owner Group were able to provide advice and input into the submission but due to the tight provincial timelines were not able to endorse the submission. The City submission also considered the input from the approximately 50 deputations made at the November 20, 2019 meeting of the Committee. The final submission can be found at: <http://app.toronto.ca/tmmis/viewAgendaItemHistory.do?item=2020.PH15.10>

Developing a Tenant Workshop

One of the action items for the Advisory Committee was to co-design and deliver a Tenant Workshop by the end of Q1 2020. Due to the COVID-19 pandemic, delivery of the workshop has been delayed. Since in-person gatherings are not currently an option, the Advisory Committee recommended developing online webinars to address key tenancy issues, and sharing existing tenant information webinars.

Future Role of Advisory Committee

The original terms of reference for the Advisory Committee called for the group to meet for a period of one-month with a primary focus on eviction prevention. Over the past several months the City has relied on this group informally to provide advice on rental support during COVID-19. The Advisory Committee has since recommended that they continue to meet over the long-term to provide input and advice to the City on various tenancy issues in addition to evictions. City staff will develop an updated terms of reference for the Sub-Committee to consider at its next meeting.

Improving Tenant Communications

In April 2020 the City's newly-formed Customer Experience Transformation and Innovation (CXi) team was engaged to develop a new tenant portal for the website. The work was initiated as a first step to address tenant communication issues identified by the Advisory Committee as well as from the deputations at the November 2019 meeting of the Sub-Committee on the Protection of Affordable Rental Housing.

The CXi team was established in the fall of 2019 to unify the City's customer service initiatives and focus on improving the customer experience. The Innovation group part of the CXi program is part of the Bloomberg Philanthropies' global Innovation Teams (i-team) network. Bloomberg Philanthropies funds i-teams around the world to drive bold innovation, change culture and create an ongoing ability to tackle big problems for residents.

Since April 2020 the Cxi team has: completed jurisdictional reviews; reviewed Toronto.ca web analytics; conducted in-depth one on one interviews with people with lived experience, stakeholders and staff; designed, tested and re-designed six website prototypes based on feedback; and coordinated interdivisional content updates for the portal. Additionally it has compiled recommendations on non-digital resources that would be helpful to tenants. The content being finalized on the website will be used to inform other communication products. Attachment 3 provides more detail about the Cxi Team and its approach to developing the new tenant portal.

The new portal is expected to be live in late September 2020. A Website Maintenance Plan will be developed and supported by an interdivisional communications team to keep the portal updated and relevant. The Advisory Committee has been engaged during the interview phase and prototype testing and will continue to provide feedback on the new portal.

Based on input received during the prototype development, the Cxi team is also developing a Tenant Toolkit prototype test to co-create a guide/toolkit providing rental resources and tools so tenants can self-advocate. It is also developing an SMS Messaging prototype to test connecting residents to information and resources via text messaging.

Staff recognize that residents do not always seek information through the City website. Given this - and based on input from the Advisory Committee - a two-phased Communications Framework has been developed which proposes how to promote the new portal as well as what other communication materials should be considered from the new portal content. A Communications Framework for Keeping People Housed: Tenant Information is provided in Attachment 4.

Potential Improvements to City Eviction Prevention Programs

The City of Toronto provides, or funds the provision of, a number of housing support and eviction prevention services that help people maintain their housing, including:

- Toronto Rent Bank;
- Eviction Prevention in the Community (EPIC) program;
- Tenant Defence Fund;
- Tenant Hotline;
- Financial Trusteeship services;
- Extreme clean services;
- General housing support services, which connect people to community services and resources to help them find housing and prevent homelessness; and
- Housing Stabilization Fund (HSF) to assist clients on Ontario Works (OW) or Ontario Disability Support Program (ODSP).

Since the Committee last met in November 2019, additional investments have been made in key eviction prevention programs. Annual funding for the EPIC program, which provides wrap-around eviction prevention services to help tenants at imminent risk of eviction, was increased from \$920,000 to \$1,990,000.

An additional one-time investment of \$2 million was made in the Toronto Rent Bank to support an additional 800 low-income households to remain housed during the COVID-19 pandemic. The Toronto Rent Bank provides interest-free loans to low-income households in Toronto who are experiencing rental arrears or require help with a rental deposit in order to prevent homelessness. This investment was funded by the Province of Ontario's Community Homelessness Prevention Initiative – Social Services Relief Fund (CHPI-SSRF), allocated to the City of Toronto in response to the COVID-19 pandemic. Rent Bank funding increased in 2020 from \$1,927,094 to \$3,927,094. The Toronto Rent Bank has also made program changes in order to be more responsive to the needs of low-income households during the COVID-19 pandemic.

Opportunities exist with upcoming program reviews to reflect on the advice from the Advisory Committee to broaden the scope of existing programs to assist tenants with N12 and N13 evictions and new market realities. Consideration is also being made on how to better communicate programs.

Improving Data Collection and Analysis to Protect Affordable Rental Housing

Early in 2020 the Staff Working Group began to discuss the need to improve data collection and analysis as it relates to evictions, affordable housing and other tenant related issues. Initial discussions sought to identify different types of data collected,

where and how data is stored, data entry and analysis capacity and cross-divisional data sharing opportunities. Issues raised included IT capacity to collect and share information in a user friendly way, challenges ensuring consistent, comprehensive data collection and entry by staff, the lack of a holistic view to data collection and analysis across service areas and a general lack of resources to be able to analyse data once it was collected.

The Staff Working Group also identified external data sources that would help inform the protection of affordable housing in Toronto. This includes data from the Landlord and Tenant Board (LTB) on evictions and above-guideline rent increases. Unfortunately the LTB does not currently track outcomes of LTB cases and does not have an information sharing agreement with the City. The City has regularly requested formal data sharing with the province, most recently in its Bill 184 submission. In addition to government data sources the City would like to explore more formal information sharing with think tanks, community agencies and tenant-led and driven organizations collecting real-time data on N12s (landlords own use) and N13 (renoviction) evictions. COVID-19 paused the City's work on this, but going forward a working group will be created to gather and share information to better inform City programs and policies related to protecting affordable rental housing.

Proposed Steps from Toronto Building to Support the Security of Tenure and Mitigate the Loss of Affordable Rental Housing

The Chief Building Official and Executive Director, Toronto Building was directed by the Planning and Housing Committee to work with other City Divisions and agencies to take steps to support the security of tenure of residential tenants and seek to mitigate the loss of affordable rental housing.

Currently, it may be possible for landlords to terminate a residential tenancy due to demolition, conversion, substantial repair, or renovation work. Depending on the extent of the proposed work, it may be necessary for existing tenants to vacate the property. Landlords use a provincial form (identified as an N13) to inform tenants of the eviction. In some cases, however, landlords evict tenants to undertake renovations, where the scope of work (or the manner in which it is undertaken) may not require that tenants vacate the premises. Tenants are able to appeal this eviction notice to the Landlord and Tenant Board.

The Ontario Building Code, enforced by Toronto Building, requires that a person apply for a building permit where there is a material alteration to a building. The Code, however, does not prescribe where it may be necessary to vacate a building in order to undertake the work for which the permit is issued, or how the work is to be undertaken. It may be possible, in some instances, for the permit-related work to be done safely with some inconvenience, rather than evict the tenant.

In order to help reduce illegitimate evictions, Toronto Building is undertaking work to review the kinds of work and permits which may legitimately create the need for the tenant to vacate a property either temporarily or permanently and subsequently to develop educational materials to advise landlords of their obligations under provincial

legislation and encourage them to undertake the work in a manner that minimizes the need for tenants to vacate the property. The Division will also be supporting the Housing Secretariat to increase access to permit information and provide more transparency for tenants who are seeking information on the scope of work identified by landlords on the provincial N13 form. This report recommends that the Executive Director, Housing Secretariat work with the Chief Building Official and Executive Director, Toronto Building to develop a process where City staff can assess the extent to which permit-related activity necessitates the vacating of a rental dwelling unit, and provide information to both landlords and tenants. Finally, Toronto Building and Housing Secretariat staff will be engaging the Ministry of Municipal Affairs and Housing to explore opportunities, based on the City of Toronto's experience, for how the provincial building regulations may be amended to mitigate against the use of building permits in illegitimate evictions.

Protecting tenants in rental buildings with less than six units in Toronto

City Planning was requested to report on a strategy to protect tenants in rental buildings with fewer than six (6) dwelling units and to conduct a scan of Toronto's stock of rental buildings with fewer than six (6) units.

The City's Rental Housing Demolition and Conversion Control By-law and Official Plan policies aim to protect tenants and the existing stock of rental housing in Toronto by regulating the demolition, conversion to condominium, and severance of residential rental properties that contain six (6) or more dwelling units. The City does not have the authority under the *City of Toronto Act, 2006* to prohibit or regulate the demolition or conversion of a residential property that contains fewer than six (6) dwelling units.

Although the City is limited in its ability to protect rental housing stock in buildings with fewer than six (6) dwelling units, a number of initiatives at the provincial and municipal levels are underway in an effort to better protect tenants of such buildings from new development.

Prior to Bill 184, the *RTA* did not provide the same protections to tenants in rental buildings with fewer than six (6) units. Bill 184 included provisions to provide tenants in smaller rental buildings with additional protections, including:

- Requiring a landlord who gives a notice of termination to a tenant for the landlord's personal use, use of a purchaser, or for the purposes of demolition, conversion or repairs pursuant to sections 48, 49, and 50 of the *RTA* to inform the Landlord and Tenant Board (LTB) if they have previously terminated a tenancy pursuant to the above sections within the previous two (2) years. The intent of this new requirement is to assist the LTB in identifying patterns and landlords who may be evicting tenants in bad faith in order to circumvent rent control;
- Requiring a landlord to compensate a tenant who receives a notice of termination for the purposes of demolition, conversion, or repairs and lives in a rental property with fewer than five (5) dwelling units in an amount equal to one (1) month's rent (previously no compensation was provided); and
- Providing for increased financial penalties where the LTB determines evictions were committed in "bad faith".

At its meeting on July 18, 2019, City Council unanimously approved Official Plan Amendment (OPA) No. 453. OPA No. 453 would add two new policies to Section 3.2.1 of the Official Plan, one of which, Policy 12, is a new tenant relocation and assistance policy that is designed to protect tenants in both multi-tenant houses and rental buildings with fewer than six (6) dwelling units. The policy requires the provision of tenant assistance where a new development would have the effect of removing one (1) or more rental units, provided a planning application is required. This policy will permit the City to secure tenant relocation and assistance through new development where the City's Rental Demolition By-law does not apply because the demolition involves fewer than six (6) dwelling units.

Although OPA No. 453 has been appealed to the LPAT and is not in force and effect, the City is working to achieve the intent of the Council-adopted policy through the development review process in order to protect tenants where redevelopment has been proposed and there are fewer than six (6) dwelling units.

An overview of rental buildings in the city with fewer than six (6) units is provided in Attachment 5.

Potential to Investigate Illegitimate Evictions under Section 380(1) of the Criminal Code

The Committee asked staff to report back on potential mechanisms for investigating illegitimate evictions and other similar fraudulent activities conducted by landlords under section 380 (1) of the Criminal Code of Canada, as well as the potential for the Toronto Police Service Board to investigate. The following is an overview of how Section 380(1) of the Criminal Code could apply to illegitimate evictions.

Section 380(1) of the Criminal Code makes it an offence for everyone who, by deceit, falsehood or other fraudulent means, whether or not it is a false pretence within the meaning of this Act, defrauds the public or any person, whether ascertained or not, of any property, money or valuable security or any service.

For a successful conviction under section 380(1) of the Criminal Code, the following elements must be proven: (a) a dishonest act, being the deceit, falsehood or other fraudulent means; (b) the detriment, prejudice, or risk of prejudice to the economic interests of the victim, caused by the dishonest act; (c) that the accused knew their acts were dishonest; and (d) subjective awareness that the accused's conduct will put the property or economic expectations of others at risk. If the accused tells a lie knowing others will act on it, and therefore put their property at risk, the inference of subjective knowledge that the property of another would be at risk is clear. The Supreme Court of Canada has recognized this test outlined above in a number of cases.

A criminal charge under Section 380(1) of the Criminal Code needs to be proven beyond a reasonable doubt. Proof beyond a reasonable doubt is a significantly higher threshold than what is used in civil litigation, where the standard is a balance of probabilities. Practically, this means that if the landlord is able to provide proof, or testify to a reasonable explanation for the eviction and the need for the residential unit, they would likely not be convicted of fraud.

Instances of illegitimate evictions have the potential to give rise to fraud charges, but this determination would have to be on a case by case basis, since it is dependent on the facts of a given instance. A party, being the tenant or a different party with knowledge of the situation, would have to make a complaint to police for an investigation to start.

Council cannot direct the Toronto Police Service to investigate matters. Council could request the Toronto Police Services Board to request the Chief of Police to investigate a specific matter, but the Board cannot direct the Chief of Police and it is the Chief of Police's operational decision. If an individual believes a crime has been committed, they can report that directly to the Toronto Police Service.

In summary, it is possible to pursue a criminal charge under Section 380(1) of the Criminal Code. Based on the legal information provided staff do not see a specific role for the City going forward regarding potential individual criminal charges. That said this may be an option that individuals or organizations choose to pursue.

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ATTACHMENTS

Attachment 1 - Advisory Committee on the Protection of Affordable Housing Membership List

Attachment 2 - Advisory Committee and Property Owner Group Advice

Attachment 3 - Customer Experience Transformation and Innovation (CXi) team's Approach to Development of Tenant Portal

Attachment 4 - A Communications Framework for Keeping People Housed: Tenant Information

Attachment 5 - Overview of Rental Buildings in the City with Fewer than Six (6) units