

**RE: MM32.23 - Taking Action to Protect Tenants**

**22 July 2025**

Dear Mayor Chow and Members of Toronto City Council,

I write to you as a Toronto Resident who has lived and serves as both the Executive Director of Disability Justice Network of Ontario and co-Chair of the national Accessible Housing Network. In all these capacities, I wish to use this opportunity to reflect on item MM32.23 - Taking Action to Protect Tenants, brought forward by Councillor Josh Matlow, seconded by Mayor Olivia Chow, and supported by Councillor Chris Moise. This motion reflects on the RentSafe Program and is supported by many of our tenant organizing allies.

The RentSafe Program is one of the few like it in the Province and could be a model for us to advocate for in other jurisdictions, however it does not fulfill everything that it needs to be for us to do so. Recently, I've been having discussions with disabled tenants across our city around the RentSafe Program and something which is very clear from disabled tenants is that RentSafe isn't keeping us safe.

As the City cites in your Disability Inclusion Action Plan (up for final approval, also today):

- 1 in 4 people in Toronto have a disability;
- 60% of disabled Torontonians earn less than 40,000 dollars; while,
- We know that to thrive in the City, according to the Wellesley Institute, one requires double this—in many cases around 81,000 dollars.

Further, we know from our own experience and that of the Federal Housing Advocate, we know that there are higher rates of dissatisfaction with pests, mould, and repairs for disabled people in general compared with our abled peers.<sup>1</sup> This also is true for our own lacking experiences of access and accessibility in apartments, condos, and other housing spaces around the City. Finally, as I've written in previous letters to you, we also know that the population of unhoused disabled people on social assistance programs alone is skyrocketing while rents do the very same.

RentSafe, as it currently stands, provides cover for landlords exacting expensive, unsustainable rents from disabled tenants while not providing assurances that the best possible accessibility, health and safety, and other standards are actually met. We are heartened that—in addition to the necessary sign program—that further factors for RentSafe are being considered, including:

- more appropriate weighting for high risk, moderate risk and cosmetic categories that places higher emphasis on higher risk items;
- a larger deduction applied to the reactive score as a result of enforcement actions (Orders, Notices of Violation and Emergency Orders);
- how to ensure officers are trained to rate building elements consistently; and
- how to adopt Administrative Monetary Penalties for property standards violations in apartment buildings.

However, you'll notice the lack of clear accessibility standards as part of these suggestions. It is clear that the City's Accessible Housing Working Group would be an excellent area to send development of such standards to based on their [Guidelines on Increasing the City's Supply of Accessible Affordable Housing](#).

We hope that accessibility can be meaningfully considered as part of RentSafe going forward, that disabled tenants will not be left behind in 'good' buildings that are fundamentally unsafe and inaccessible. We believe that for RentSafe to keep us safe, we have to be part of the process to rebuild it. There can be nothing about us, without us—only then can RentSafe be a measure or tool that fully supports disabled tenants.

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<sup>1</sup> See Federal Housing Advocate and Canadian Human Rights Commission's Data Monitoring Project: *Monitoring the right to housing for people with disabilities*. Available at: <https://www.chrc-ccdp.gc.ca/resources/publications/monitoring-the-right-housing-people-disabilities>

To close, we also remind you that signs and city motions can only be a start, there must be follow through. While approved months ago, we remain in wait for the AHWG Guidelines to be fully integrated into the City's Affordable Housing Guidelines. We remain in wait for the City to take action to advance pressure on the Province to massively increase the housing allowance portion of our social assistance systems and further demands for [full rent control](#).

There is much to be done to solve the polycrises facing our City when it comes to housing, but we know you can act now—start with the signs, but don't forget the whole content of this motion and what it will require to be meaningful for all of us.

With sincerest respect,



Brad Evoy

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*Building a **world** where disabled people are free to be.*