

Toronto
Community
Housing



Human Rights Policy Consultations

*Summary of Tenant
Feedback - 2023*



Background

In October 2022, Toronto Community Housing (TCHC) started a project to improve its tenant human rights system. This project includes rewriting several of TCHC's policies and procedures, and increasing supports for tenants and training for staff to better understand and use the human rights system. The goal of the project is to make sure that TCHC is meeting its obligations to tenants under the *Ontario Human Rights Code* in a way that is consistent, equitable and tenant-focused.

In June 2023, the Ombudsman Toronto published a report titled "*An Investigation into Toronto Community Housing Corporation's Tenant Human Rights Complaints Process*". This report made several recommendations for TCHC to improve the way in which it receives, investigates and responds to tenant human rights complaints. TCHC has accepted all these recommendations, including the recommendation that we develop an interim tenant human rights complaint process while we complete the larger tenant human rights review project.

Overview of tenant feedback

TCHC held three in-person tenant consultations in May and one virtual tenant consultation in June. Approximately 150 tenants attended these consultations in total. TCHC also held a consultation with its tenant accessibility committee R-PATH in August.

These tenant consultations were the first in a series of consultations TCHC will hold about its tenant human rights project. They focused on introducing the tenant human rights review project to tenants and consulting them on the interim tenant human rights complaint procedure.

TCHC invited several external stakeholder groups for feedback and consultation. We targeted agencies that work with TCHC tenants on human rights issues, including the local legal clinics and tenant advocacy groups. We also invited the City of Toronto's Housing Stability Services unit to attend.

Through these consultations we heard that tenants and other stakeholders are eager for improvements in TCHC's tenant human rights system. They shared that they would like the system to be more user-friendly, consistent and for staff to be more aware of human rights issues and how to respond to them. Tenants want to be active participants in the tenant human rights project and want meaningful opportunities to give feedback on the changes TCHC will make to its human rights system.



Tenants shared feedback about how they would like to participate and receive information.

<p>Topic</p>	<p>Tenant feedback</p>
<p>Participation in consultations</p>	<ul style="list-style-type: none"> • Tenants want to be involved in developing TCHC’s human rights policies and procedures, not just okaying them once they’re revised and in the final approval stages. • Tenant consultations need to be broadly advertised, well ahead of time so that tenants are aware of them and can arrange to attend; they need to be scheduled no earlier than 6:30 p.m. to allow enough time for tenants to commute from work. • Tenants want to receive a summary after consultations about what TCHC learned from tenants at the consultations.
<p>How tenants receive information about the human rights system</p>	<ul style="list-style-type: none"> • Tenants want information to be as broadly available as possible to meet the full range of tenant needs. • Information should be available on the TCHC website, on social media, through the Client Care Centre, at Hub offices and from the staff they work with directly, like Tenant Services Coordinators. • Information has to be available in accessible formats that account for different disabilities and language needs.



Tenants shared feedback on how complaints are received and responded to.

Topic	Tenant feedback
How human rights complaints are received	<ul style="list-style-type: none">• Tenants want as many options as possible to make a complaint, including over the phone, in writing/by email and on the website.• Tenants want to be able to speak directly to the staff who would be involved in investigating and resolving their human rights complaints when they are made to make sure they have all the relevant information.
How human rights complaints are addressed	<ul style="list-style-type: none">• Some tenants want the option to meet with staff who are investigating their human rights complaints during the investigation process to make sure they understand the issues underlying the complaint.• Other tenants wanted all correspondence about their complaint to be over email or the phone for accessibility or other reasons.• Regular communication with tenants about where TCHC is in the process of investigating and responding to their complaint is very important so that tenants are not left in the dark.• Tenants need clear explanations for what decisions TCHC has made about their complaint, what information they used to come to that decision and how they're going to respond to the complaint.



Tenants shared feedback about the processes and support how to get support from staff.

Topic	Tenant feedback
What should happen when tenants disagree with TCHC's response to a human rights issue	<ul style="list-style-type: none">• TCHC must have a formal reconsideration or appeal process for when tenants disagree with a decision TCHC has made that relates to human rights, like an accommodation transfer decision or resolution of a complaint.• TCHC must explain that this process is available and how to use it when they make a decision about human rights issue or complaint.
What staff support tenants need to use the human rights system	<ul style="list-style-type: none">• TCHC should have a human rights office or team of staff who are dedicated to advising on and responding to human rights complaints issues and complaints.• Staff who are not directly involved in resolving human rights complaints but interact regularly with tenants (like Superintendents and Tenant Services Coordinators) need training to understand and be sensitive to human rights issues.

Summary of consultations



Several themes emerged through the consultations:

- TCHC's policies, procedures and practices must be flexible to meet diverse tenant needs.
- Tenants need to feel that TCHC is respecting their dignity by being sensitive, understanding the importance of upholding tenants' human rights, maintaining the confidentiality of tenants' information, applying consistent and predictable practices and clearly communicating with tenants.
- Staff need better training and access to subject matter expertise on how to identify and respond to human rights issues.
- Tenants feel as if they are the subject matter experts on best practices for managing human rights concerns and want to be fully involved in the tenant human rights redesign project.

Next steps



Through the end of 2023 and beginning of 2024, TCHC will revise its policies and procedures that relate to human rights. We will also implement the new interim tenant human rights complaint procedure.

TCHC will continue to hold consultations with the R-PATH accessibility committee and the new Tenant Advisory Committee throughout this process. TCHC will also hold further tenant consultations that will be open to all tenants. Finally TCHC is continuing to work with the Ombudsman Toronto to make sure our tenant human rights complaint process meets the standards of the Ombudsman.