

Tolpuddle Housing Co-operative

Board of Directors – Consolidated Response to Staff Report “Tolpuddle Housing Cooperative – Capital and Operational Transition Plan”

Community and Protective Services Committee (CPSC)

Prepared By: Jo-Dee Phoenix on behalf of the Board of Directors

City of London | April 2026

Executive Summary

The Board of Directors of Tolpuddle Housing Co-operative submits this consolidated response to the April 2026 staff report to provide critical context, correct the public record, and clearly articulate the systemic challenges underpinning the current situation.

The Board acknowledges the concerns raised and supports the City’s efforts toward short-term stabilization. However, it is the Board’s firm position that the issues identified are **not isolated, not new, and not attributable solely to governance or management practices**. Rather, they are the direct result of a **structural failure within the housing system**, where increasing member complexity has not been matched by corresponding funding, supports, or operational models.

Tolpuddle represents a **case study of system strain**, not system failure.

See **Appendix A** for additional information relating to the history of Tolpuddle Housing Co-operative and the Tolpuddle Martyrs

Purpose of this Response

This report has been prepared to:

- Clarify Tolpuddle’s operational and oversight status
 - Document actions taken by the Board and Property Manager
 - Outline the historical financial and operational context
 - Identify systemic funding and service delivery gaps
 - Advocate for a sustainable, integrated housing model
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Clarification of Oversight and Governance Status

Tolpuddle was **never formally designated as a “Project in Difficulty”** under the legislated framework of the former Social Housing Reform Act.

Rather, it was identified under the City’s administrative designation of a **“Project Requiring Intervention (PRI)”**, a non-legislated, collaborative tool intended to enable early support and partnership-based stabilization.

This distinction is critical:

- The PRI designation reflects **early identification and proactive engagement**, not failure
- It demonstrates **transparency and willingness to work collaboratively**
- It aligns with the **modernized, partnership-focused approach under the Housing Services Act**

Assertions or implications of governance failure are, therefore, **mischaracterizations of the factual record**.

Historical Financial Context and Service Manager Role

Tolpuddle reported an accumulated deficit of **(\$95,631)** as of July 31, 2023, disclosed through the Annual Information Return and audited financial statements.

Under the **Housing Services Act**, this constitutes a triggering event and imposes a clear obligation on the Service Manager to:

- Monitor the situation
- Provide reasonable assistance
- Act proactively to prevent escalation

The Board formally notified the City multiple times and submitted requests for support, including safety-focused business cases in **April 2024 and April 2025**.

Despite these efforts:

- No timely or substantive intervention was provided
- Previously directed actions by CPSC were not implemented
- Meaningful response only occurred after public escalation

This lack of response materially contributed to the deterioration of operating conditions and represents a **failure of system accountability**.

Operating Environment and System Pressures

Tolpuddle operates within a housing system that has undergone a significant transformation.

The City's priority-based housing model has appropriately increased access for highly vulnerable individuals. However:

- Member acuity has risen significantly (mental health, addictions, safety risks)
- Placement practices do not align with cooperative housing capacity
- Supports, funding, and service models have **not evolved accordingly**

This has created a **structural mismatch** between:

What housing providers are expected to manage
and
What they are resourced to deliver

These pressures are **system-wide**, not unique to Tolpuddle.

Property Management Transition and Initial Conditions

The Property Manager was engaged in October 2023 to provide stabilization support.

At intake, the property was experiencing:

- Financial disorganization
- Major capital deficiencies and repeated flooding
- High vacancy levels
- Severe safety concerns, including criminal activity and vulnerable members
- Operational strain from years of under-resourcing

These conditions were **not newly created** but rather the culmination of systemic pressures and insufficient support.

Board and Management Actions

Despite operating in a high-risk, underfunded environment, the Board and Property Manager:

- Reconstructed financial systems and completed audits
- Restored governance practices and compliance
- Returned **21 units to occupancy**
- Reduced criminal activity and improved building safety
- Coordinated with City staff, police, and external partners
- Maintained continuous operations despite reduced staffing capacity

The Board also:

- Enforced arrears and eviction policies where necessary
- Removed problematic vendors and strengthened maintenance oversight
- Implemented security measures at significant financial strain
- Responded immediately to all inspection requirements

These actions demonstrate **diligence, accountability, and sustained effort—not negligence.**

See **Appendix B** for additional relevant background information specific to Governance

Funding Constraints and Structural Inequity

The operational challenges identified in the staff report are directly linked to **structural funding limitations**, including:

- Fixed funding levels disconnected from member complexity
- Reduced administrative and maintenance capacity (e.g., staffing reductions from 60 to 35 hours/week)
- No funding for security, supports, or enhanced operations

This is further compounded by **systemic inequity**:

- Larger providers (e.g., LMCH) receive significant subsidies, staffing, and integrated supports
- Tolpuddle operates on **property management fees without embedded infrastructure**
- Yet is expected to manage **equal or greater member complexity**

This imbalance is **unsustainable and fundamentally inequitable.**

Failure of Funding and Support Mechanisms

The current Housing Services Act funding framework:

- Relies on outdated benchmark assumptions
- Does not account for high-acuity member populations
- Provides no mechanism for:
 - Security funding
 - Enhanced staffing
 - Integrated supports
 - Damage recovery (often exceeding \$50,000 per unit)

Additionally:

- COCHI funding has been delayed due to unresolved administrative issues
- Approved directions (e.g., lien separation) have not been implemented
- Critical safety and capital needs remain unfunded

This represents a **breakdown in both funding delivery and oversight.**

System-Wide Nature of the Challenges

The issues at Tolpuddle are not isolated.

Comparable challenges are being observed across the system, including at larger providers with significantly greater resources. This demonstrates:

- The issue is **not provider-specific**
- The issue is **structural and system-wide**

Tolpuddle is therefore **an early indicator—not an exception.**

Need for Integrated Service Delivery

The Board would support the transition to an **integrated supported housing model**, including:

- Mental health and addictions services
- Community safety partnerships
- Embedded supports aligned with housing operations

This position has been consistently advocated by the Board and Property Manager and remains critical to long-term sustainability.

Without integration:

Housing providers are being asked to solve **health and social challenges without health and social resources**

Path Forward

The Board remains committed and welcomes meaningful support from the City to:

- Stabilize operations in the short term
- Implement appropriate governance and operational supports
- Advance integrated service delivery models
- Establish funding frameworks aligned with actual operating realities

Immediate priorities include:

- Release of approved funding (including COCHI)
 - Review of member placement practices, including pre-assessment of support needs and individual applicant support plans during the application process of RGI housing through the centralized waiting list to increase successful tenancies.
 - Targeted investment in safety and staffing
 - Strengthened accountability mechanisms
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Conclusion – A Call for System-Level Action

The Board of Directors respectfully urges the Community and Protective Services Committee to recognize that Tolpuddle is not an isolated operational issue—it is a **clear and urgent signal that the community housing system is no longer aligned with the realities it is expected to serve.**

What is being experienced at Tolpuddle today will continue to emerge across the system tomorrow.

This is not a question of governance.
This is not a question of property management.

This is a question of **public policy, funding adequacy, and system design.**

Without decisive action:

- Providers will continue to be set up to fail
- Vulnerable members will continue to be placed in unstable environments
- Municipal resources will continue to be strained by reactive interventions

Tolpuddle presents a critical opportunity—not just to stabilize a property, but to **redefine the model.**

The Board calls on the City of London to:

- Move beyond short-term stabilization
- Demonstrate leadership at the municipal level
- Champion a modern, integrated, and adequately funded housing system

One that reflects the **true cost of housing vulnerability.**

The Board remains committed to working in partnership to achieve this outcome — for the benefit of its Members, the community, and the future of community housing in London.

APPENDIX A

The Tolpuddle Martyrs were six agricultural labourers from the village of Tolpuddle in Dorset, England, arrested and tried in 1834 for swearing a secret oath as members of a friendly society. Led by George Loveless, they formed the Friendly Society of Agricultural Labourers during a dispute over severe wage cuts that had reduced their income to near-starvation levels.

Although trade unions had been technically legal since 1825, the British government—fearful of organised labour—used the obscure Unlawful Oaths Act of 1797 to prosecute them. In the case of *R v Loveless and Others*, all six men were convicted and sentenced to seven years' penal transportation to Australia.

The events that led to their arrest were rooted in decades of hardship. Following the repeal of the Combination Acts in 1824, unions were legal but heavily restricted. In rural Dorset, wages remained extremely low, and by the early 19th century, many labourers depended on poor relief. Conditions worsened after the Napoleonic Wars, contributing to unrest such as the Swing Riots, which saw widespread protests across southern England.

By 1833, wages in Tolpuddle had fallen from ten shillings a week to as little as six. In response, the six men—James Brine, James Hammett, George Loveless, James Loveless, Thomas Standfield, and John Standfield—formed their society to resist further cuts and support one another. Like many such groups, they used symbolic rituals, including the swearing of secret oaths.

Their prosecution was driven by local magistrate James Frampton, who appealed to the Home Secretary Lord Melbourne. The trial, overseen by Judge Sir John Williams, resulted in all six men being found guilty.

The harsh sentence provoked widespread outrage. The Tolpuddle Martyrs quickly became symbols of injustice, inspiring one of the first mass political campaigns in Britain. Around 800,000 people signed petitions demanding their release, and large public demonstrations were held in support.

In 1836, following sustained public pressure and the intervention of Lord John Russell, the men were granted pardons. They returned to England between 1837 and 1839.

Later, most of the Martyrs emigrated to Upper Canada (modern-day Ontario), including settling in what is now London. Today, some are buried there, linking their legacy directly to Canadian history.

The Tolpuddle Martyrs became enduring icons of the labour movement. Their story is commemorated annually at the Tolpuddle Martyrs' Festival, organised by the Trades Union Congress, and remembered as a pivotal moment in the fight for workers' rights.

(Wikipedia, 2026)

The parallels between the 19th-century Tolpuddle Martyrs and the 21st-century Tolpuddle Board of Directors are both striking and deeply unsettling.

In 2026, the Tolpuddle Board of Directors stands with the same conviction for systemic change and equity. We continue to serve those marginalized by a system that is not only strained, but in many respects, failing. There is clear and growing public interest in addressing these inequities—and in ensuring meaningful, lasting reform.

For months, this Board has worked diligently and without compensation, making difficult and often complex decisions in the best interests of the Cooperative and its Members. The value of this work is not reflected in financial terms—indeed, it is less than the six shillings once fought over—but in the tangible progress achieved where others, over decades, have been unable to do so.

It is both discouraging and galvanizing that our efforts have been met, at times, with resistance and retribution rather than the support and collaboration that were both expected and warranted. Despite this, the impact of this Board has been significant—arguably the most meaningful progress seen at Tolpuddle in over 30 years.

Our mandate is clear. We are committed to safeguarding the well-being of our Members and protecting the integrity of affordable housing within this community. We are not the first to raise these deeply rooted, systemic concerns—but we are determined to ensure they are no longer dismissed, deferred, or ignored.

Respectfully and in Solidarity

Jo-Dee Phoenix
President
Tolpuddle Housing Cooperative

APPENDIX B

Additional Relevant Background Information Specific to Governance

Prepared by:

Jo-Dee Phoenix

On behalf of the Board of Directors

April 8, 2026

It is Tolpuddle Cooperative's clear and unequivocal understanding that *prior to any Triggering Event*, the Service Provider is obligated to make reasonable efforts to assist. This has not occurred. There is no evidence of meaningful support, intervention, or follow-through by the City despite repeated requests from the Board.

The Board of Directors has formally requested assistance from the City's Housing Division on multiple occasions. These requests have been consistently ignored or left without response. This pattern reflects a systemic failure in accountability and support.

Approximately 18 months ago, the Board requested a comprehensive Security Audit, outlining serious and ongoing safety risks to Members due to both the geographic location of the property and the presence of illegal drug activity within the community. The City advised that a broader audit was underway and that funding might be tied to its findings. To date, no report, no follow-up, and no funding have been provided. This inaction has directly contributed to the deterioration of safety conditions at Tolpuddle.

The Board also raised urgent concerns regarding the extensive damage to units caused by housing individuals requiring highly supportive living arrangements—needs that Tolpuddle is not equipped to meet. The Board was directed to pursue COCHI funding and was assured that Tolpuddle's unique circumstances would be considered. This assurance has proven to be without substance. No additional funding has been allocated, while unit rehabilitation costs now routinely exceed \$50,000 per unit—costs the Cooperative cannot sustainably absorb.

At the most recent CPSC meeting, clear direction was provided to City Staff to:

- Separate the outstanding lien from COCHI funding considerations
- Release COCHI funds to the Cooperative

City Staff has failed to act on this directive.

Staff have not undertaken even a basic review of the invoicing submitted by the lien holder, despite being informed that the Cooperative disputes the claim and intends to defend it. The Board has directed Apex Property Management to secure legal representation at no cost to the Cooperative and is currently awaiting progress. Meanwhile, City Staff have imposed conditions tying essential funding to the settlement of a disputed claim they have refused to review. This is unreasonable, procedurally unfair, and unacceptable.

The invoicing practices of the vendor in question are, in the Board's view, unethical and potentially fraudulent. City Staff were made aware of these concerns yet declined to investigate. No follow-up inquiries have been made.

As a direct result of withheld funding, **Tolpuddle has been forced to deplete its Capital Reserve Fund** simply to meet basic financial obligations. This is not sustainable and places the long-term viability of the Cooperative at risk.

In Spring 2025, the Board proactively requested a meeting with John Sherratt of the Housing Division to explore options for governance and financial support under the Housing Services Act. The Board proposed the inclusion of external Board members while maintaining Member quorum. This initiative was acknowledged and praised at the time. However, no action or follow-up occurred.

This lack of response is consistent with numerous other requests made by the Board—all of which have been ignored.

Retaliatory Actions and Inspections

Following the Board's appeal to CPSC, the Cooperative was subjected—within days—to extensive inspections by:

- The London Fire Department
- Property Standards By-Law Enforcement

The timing and intensity of these inspections raise serious concerns. It is the Board's position that these actions were retaliatory in nature and intended to deflect from the City's own failures.

Despite this, the Board fully cooperated. These inspections ultimately provided valuable clarity regarding property conditions. Inspectors can attest to the Board's professionalism, responsiveness, and commitment to compliance. All identified issues have been addressed promptly and thoroughly.

Shane Maddox with Property Standards and Chris Rennie with the London Fire Department will assure you of the immediate and concise action taken by the Board to ensure compliance

Operational Pressures and Mismatch of Housing Mandate

Tolpuddle faces increasing pressure to accept individuals from the Housing Access List who are not suited to cooperative living and require levels of support beyond what the Cooperative can provide. This has resulted in:

- Significant property damage
- Increased arrears and evictions
- Heightened safety risks for Members

The City continues to insist on these placements despite clear evidence that this model is failing. Comparable challenges have been identified by the City at other properties, yet Tolpuddle is being required to absorb these same risks without adequate support or funding.

This approach is neither reasonable nor sustainable.

Correction of Inaccuracies in Staff Reporting

The Staff report contains factual inaccuracies that must be corrected:

- The Board has not been reduced to quorum.
- The Board mentorship transition was properly handled following the departure of Kim Ingram in 2022. Denise McGahan was duly appointed but ceased attending meetings independently.

The Board Mentor, Kim Ingram, left Tolpuddle in 2021 and was replaced, by a vote of the Directors, with Denise McGahan of CHF. Ms. McGahan unilaterally stopped attending meetings in this capacity and has recently asked to be invited back to meetings.

Ms. McGahan was voted in as Board Mentor to allow her to attend meetings without an official invitation. She stopped attending meetings in early 2025.

These misrepresentations undermine the credibility of the report and mischaracterize the governance of the Cooperative.

Escalating External Pressures

There has been a significant increase in unauthorized individuals accessing the property, many of whom are experiencing homelessness, mental health challenges, and substance use issues. This has led to:

- Increased vandalism and theft
- Safety risks to Members
- Ongoing property damage

The Board has repeatedly requested assistance from both the City and Police Services. No meaningful support has been provided.

Operational costs have risen sharply as a result. The Cooperative has been forced to retain on-site security personnel to ensure basic safety. Contrary to assumptions, measures such as lighting upgrades alone are insufficient, particularly when fixtures are repeatedly vandalized or stolen.

Requests for security funding have been denied or ignored.

Board Actions and Accountability

The Board categorically rejects any suggestion of negligence or mismanagement. On the contrary, the Board has taken decisive and responsible action under extremely constrained circumstances, including:

- Enforcing eviction processes for non-payment. All evicted Members were receiving an RGI from the Service Manager. Tolpuddle has reported these unfortunate circumstances many times to the Service Manager.
- Attempting to address criminal activity despite lack of enforcement support
- Terminating unethical vendor relationships
- Hiring competent maintenance leadership who is responsible for most of the tangible improvements at Tolpuddle.
- Implementing cost-saving measures without compromising quality
- Sourced out renovation materials at Habitat ReStore to be cost effective
- Maintaining consistent security presence. These individuals put themselves in harms way so that we can sleep at night.

- Addressing vandalism and hate speech promptly and repeatedly
- Reducing fire-related incidents significantly
- Enforcing trespass provisions under the Trespass to Property Act
- Seeking external support and collaboration at every opportunity

All Board decisions are made unanimously, **reflecting a disciplined and accountable governance model.**

Conclusion and Required Action

The Board welcomes meaningful support from the City. However, the pattern to date has been one of neglect followed by punitive oversight only after escalation to CPSC.

This is unacceptable.

The Board formally requests that CPSC:

1. Direct City Staff to provide a full accounting of their lack of response to repeated Board requests
2. Ensure immediate compliance with prior directives regarding COCHI funding
3. Require a report on the social and environmental impacts affecting Tolpuddle, particularly related to OEV and unsuitable housing placements
4. Support the inclusion of external Board members while preserving Member quorum, as previously proposed

Tolpuddle is operating under conditions that are both unsafe and unsustainable. The Cooperative has acted responsibly and proactively at every stage. The same standard must now be applied to the City.