

June 20, 2022

Community & Protective Services Committee  
300 Dufferin Avenue  
London, ON N6B 1Z2

Dear Chair and Members

In reference to the June 21, 2022 report to CPSC regarding "RentSafeTO Program and Complaint Process Improvements", staff report

While Civic Administration does not recommend such a program, as it mirrors a licensing program for apartment units, through discussions with stakeholders at the Tenant Landlord Taskforce (TLT) a range of compliance process improvements are proposed.

As an appointed member of a Task Force with no formal standing and no council member appointed, I was not, unfortunately, surprised to see a report coming to you that was not discussed with the stakeholders of the TLT. We have met only four times and the initial 2 ½ meetings were consumed by developing terms of reference, to bring the members to a place of common ground. The issue of Residential Rental Units Licensing (CP-19) was raised at our last meeting, and the RentSafeTO Program and the Hamilton models were suggested as good models to work from to help address the fragmented system of By-Law Enforcement and communication to the victims of property standards violations.

At no time were we asked to provide input to Civic Staff on this model, nor on any of the process improvements that could potentially be considered. Indeed, the report's author popped into our meeting to make a 15-minute presentation on their take on what a London RentSafe program could look like. Following his presentation, member requested more information to review at a later date. By the meeting's end, the TLT had identified what information topics a London specific website should potentially include, but we did not address by-law enforcement, nor communication with complainants, as we were asked to find precedence in other municipalities, due to the city reticence to release records/orders. The fact that the RentSafeTO Program exists, is one strong example, as is the Order from the Information and Privacy Commissioner of Ontario <https://decisions.ipc.on.ca/ipc-cipvp/orders/en/item/128213/index.do>

It is my feeling that Council needs to appoint a City Councillor to this task force, as is the norm. Task Forces and Special Committees are meant to play an important role in the governance process by reviewing and providing advice and recommendations to Civic Administration on reports being brought forward to Council. Finding out in the news that a report is being brought forward that implies we had such a discussion at the Task Force is an affront to the members dedicating their time to help effect positive change in our community.

Further, in terms of the “RentSafeTO Program” mirroring the licencing program for apartment units in London, it is not even close. As the Task Force has not met to review the Civic Administration’s Report, I can only provide my individual lens on the differences, noted in the table below.

I would request that you receive the report for information only and that staff be directed to consult with the LTL and invite the LTL to provide a recommendation to Council in this regard as well, before Council approves going forward or not going forward to implement such a program for London.

Sincerely



Jacqueline Thompson

LIFE\*SPIN

cc London Tenant Landlord Taskforce

Toronto	London
Rent Safe	By-law enforcement
<ol style="list-style-type: none"> <li>1. Administers building registration</li> <li>2. Process for tracking, responding &amp; investigating tenant complaints in a timely fashion of 7 days (24 hours if vital service). Tenant provided tracking number to follow progress on the municipal website.</li> <li>3. Registration evaluation every 3 years.</li> <li>4. Building audits for those scoring less than 50% in the evaluations. Owners are charged fees for this audit.</li> </ol>	<ol style="list-style-type: none"> <li>1. Administers <u>some</u> building registrations</li> <li>2. Send an email to enforcementlondon.ca to register a complaint. No other information is provided, there are no timelines, nor ways to find out what was done with your complaint, and all potential actions are discretionary. (The Free Press had to file a freedom of information request to find out that bylaw enforcement was aware 1281 Hillcrest was operating as an unlicensed property as far back as 2017). Staff reports that tenants have to provide written documentation of notifying the landlord and wait up to 3 weeks before notifying the city.</li> <li>3. License in force until ownership changes - Under licencing penalty, Section 10.2, you may wish to note. “A director or officer of a corporation who knowingly concurs in the contravention of any provision of this By-law is guilty of an offence” and this should be equally applied to the officers of the Corporation of the City of London.</li> <li>4. Not applicable, since no evaluations are done.</li> </ol>