



Q1 2024 Quarterly Report to Ombudsman Toronto: TCHC's Tenant Human Rights Complaints Procedure

Item 7

July 30, 2024

Board of Directors

Report: TCHC:2024-46

To: Board of Directors (the "Board")

From: President & Chief Executive Officer and
General Counsel & Corporate Secretary

Date: June 25, 2024

PURPOSE:

The purpose of this report is to advise tenants on TCHC's progress on the recommendations in the Ombudsman Toronto's June 2023 report, *An Investigation into Toronto Community Housing Corporation's Tenant Human Rights Complaints Process* as of March 31, 2024. TCHC is required to report to the Ombudsman on its progress on a quarterly basis.

RECOMMENDATIONS:

It is recommended that the Board receive this report for information.

Background

Pursuant to the recommendations in the Ombudsman's Report, TCHC is sharing this progress report with the Board and tenants. TCHC will continue to work proactively with the Ombudsman to address its recommendations as well as its previous concerns with TCHC's transfer policies and procedures.

As of March 2024, TCHC had completed six of the recommendations in the Ombudsman's Report, being:

Table 1 – Completed Ombudsman Recommendations

#	Recommendation
2	As part of this update, TCHC should immediately post online information about the project to update its Human Rights Policy and Human Rights Complaint Procedure. This should include information about the scope of the project, its impact on tenants, and where tenants can find out more information. It should also clearly communicate how tenants can participate in the re-design of the human rights complaint process.
3	TCHC should establish, and clearly communicate to staff and tenants, interim measures for addressing tenant human rights complaints, while it updates its human rights complaints process.
5	TCHC should clearly define and communicate how individuals can make human rights complaints, including relevant contact information. TCHC should ensure that tenants are given correct information about its internal escalation process, as well as outside agencies and resources that they may wish to consult, including the Human Rights Tribunal of Ontario, the Human Rights Legal Support Centre, and community legal clinics.
6	TCHC should ensure there are opportunities for tenants to request reconsideration or appeal of TCHC decisions about their human rights complaints.
7	<p>TCHC should develop a clear and detailed process for staff to document and respond to human rights complaints, including internal resources that will help staff navigate this process. It must ensure that its process dedicates and identifies qualified staff with subject-matter expertise.</p> <p>TCHC should hold informed and meaningful consultations to receive feedback from tenants, staff, outside experts, and people who interact with TCHC to help establish a fair, trustworthy, accessible and effective process for handling human rights complaints.</p>
8	TCHC should hold informed and meaningful consultations to receive feedback from tenants, staff, outside experts, and people

	who interact with TCHC to help establish a fair, trustworthy, accessible and effective process for handling human rights complaints.
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Work was progressing in relation to the remaining recommendations, as set out in Table 1 below.

Table 2 – Status of Implementation of Ombudsman Recommendations

Total Number Recommendations	Completed	Outstanding (Identified Implementation Date)			
		Q3 2024	Q4 2024	Q1 2025	Not Defined
14	6	1	3	1	3

A copy of the Ombudsman Toronto's report is attached as Attachment 1 to this report.

TCHC staff are progressing on revisions to our policies and procedures in the context of the broader human rights project, including the internal transfer policy. TCHC will provide a further update to the Board and Tenants on its progress on the Ombudsman's recommendations as of Q2 2024 at its next Board meeting.

SIGNATURES:

"Sean Baird"

Sean Baird
President & CEO

and

"Darragh Meagher"

Darragh Meagher
General Counsel & Corporate Secretary

ATTACHMENT:

1. Ombudsman Toronto Report, *An Investigation into Toronto Community Housing Corporation's Tenant Human Rights Complaints Process* Status Report on Ombudsman Toronto Recommendations dated June, 2023.

STAFF CONTACT:

Katie Douglas, Legal Counsel

647-880-2057

Katie.Douglas@torontohousing.ca

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Attachment 1

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#	RECOMMENDATION	Q1 2024 UPDATE	Q1 2024 STATUS	ESTIMATED COMPLETION DATE
1	TCHC should ensure that all information on its website related to its human rights complaints process is up to date and accurate, and that it continues to update its website as this process evolves.	Staff continue to update the website with project updates and tenant consultation information.	ONGOING	Q4 2024
2	As part of this update, TCHC should immediately post online information about the project to update its Human Rights Policy and Human Rights Complaint Procedure. This should include information about the scope of the project, its impact on tenants, and where tenants can find out more information. It should also clearly communicate how tenants can participate in the re-design of the human rights complaint process.	N/A	COMPLETE (Q4 2023)	N/A
3	TCHC should establish, and clearly communicate to staff and tenants, interim measures for addressing tenant human rights complaints, while it updates its human rights complaints process.	TCHC implemented its interim tenant human rights complaint procedure in January 2024. This followed staff training and a staff and tenant communication campaign between October 2023 and January 2024.	COMPLETE	N/A
4	TCHC should assess what resources it needs to ensure that it completes, as a priority, the project to update its Human Rights Policy and Human Rights Complaint Procedure. TCHC should establish milestones and timelines to ensure that the update is completed without delay.	As part of TCHC's 2024 operating budget, TCHC approved two new positions to assist in implementing the measures under its human rights project, including the interim tenant human rights complaint procedure.	ONGOING	Q1 2025

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5	TCHC should clearly define and communicate how individuals can make human rights complaints, including relevant contact information. TCHC should ensure that tenants are given correct information about its internal escalation process, as well as outside agencies and resources that they may wish to consult, including the Human Rights Tribunal of Ontario, the Human Rights Legal Support Centre, and community legal clinics.	TCHC implemented its interim tenant human rights complaint procedure in January 2024. The interim complaint procedure, including relevant contacts and a comprehensive tenant guide with information on external supports are available on the TCHC website.	COMPLETE	N/A
6	TCHC should ensure there are opportunities for tenants to request reconsideration or appeal of TCHC decisions about their human rights complaints.	The interim tenant human rights complaint procedure includes a reconsideration procedure.	COMPLETE	N/A
7	TCHC should develop a clear and detailed process for staff to document and respond to human rights complaints, including internal resources that will help staff navigate this process. It must ensure that its process dedicates and identifies qualified staff with subject-matter expertise.	The interim tenant human rights complaint procedure directs staff, including subject matter experts in legal services on how to document and respond to complaints. TCHC has created a detailed staff guide that helps staff understand and apply the procedure.	COMPLETE	N/A
8	TCHC should hold informed and meaningful consultations to receive feedback from tenants, staff, outside experts, and people who interact with TCHC to help establish a fair, trustworthy, accessible and effective process for handling human rights complaints.	TCHC conducted consultations from June to August 2023 and February to April 2024 including eight tenant consultations and further consultations with its R-PATH committee, tenant advisory committee, Housing Stability Services and members of the legal community serving TCHC tenants. TCHC provided a summary report of tenant feedback after each round of consultations.	COMPLETE	N/A

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9	TCHC should develop a plan for delivering mandatory human rights training, including training on its updated/revised human rights policy and complaint process. This should be completed on a priority basis. The goal of this training must be for TCHC staff to have the tools and expertise to identify and resolve human rights complaints.	TCHC provided training to staff on the interim complaint procedure from October 2023 to January 2024. TCHC will develop and deliver training on changes under its broader human rights project in fall 2024.	ONGOING	Q4 2024
10	TCHC should periodically examine its training plan to make sure it is up to date with human rights developments.	TCHC will review its training plan annually to ensure it meets operational requirements	ONGOING	Ongoing
11	As part of its human rights complaint process update, TCHC should ensure it has an effective and consistent system for documenting and tracking human rights complaints. This should include an annual summary of complaint types, geographic areas, number and ground of Tribunal applications, and complaint trends.	TCHC is currently tracking complaints on the basis of multiple criteria. As part of finalizing the complaint procedure, TCHC will develop an annual report template to complete going forward.	ONGOING	Q3 2024
12	TCHC should report annually to the public on human rights complaint data and trends.	N/A	ONGOING	Ongoing
13	As part of its human rights complaint process update, TCHC should establish key performance indicators that staff can be measured against to ensure tenant human rights complaints are addressed fairly and effectively.	N/A	ONGOING	Q4 2024
14	TCHC should provide Ombudsman Toronto with an update on the status of the implementation of these recommendations by September 2023, and quarterly thereafter.	N/A	ONGOING	Ongoing