

## **Tenant Transfer Policy**

Item 12G April 15, 2025 Tenant Services Committee

**Report:** TSC:2025-12

**To:** Tenant Services Committee ("TSC")

From: Chief Operating Officer

**Date:** March 3, 2025

#### **PURPOSE:**

This report seeks the Tenant Services Committee's ("TSC") and the Board of Directors (the "Board") approval of the Tenant Transfer Policy and includes the associated Tenant Transfer Procedure for information. This report also includes:

- Highlights of major changes in the revised Policy and Procedure
- Findings from the tenant, staff, and stakeholder consultations.
- An overview of the implementation plan and next steps.

#### **RECOMMENDATION:**

It is recommended that the Tenant Services Committee approve, and recommend that the Board of Directors approve the Tenant Transfer Policy, provided as Attachment 1 to this report.

## **REASONS FOR RECOMMENDATIONS:**

## **Background and Policy Scope**

The proposed Tenant Transfer Policy requires approval by the TSC and the Board. The associated Tenant Transfer Procedure, as outlined in Attachment 2, has been included to provide tenants, staff and stakeholders with insight on how the Policy will be operationalized within TCHC. Following approval of the Policy by TSC and The Board, the Procedure will undergo final review and approval by TCHC's Executive Leadership Team.

The scope of the changes to the Tenant Transfer Policy includes tenant transfers currently categorized as:

- Accommodation under the Human Rights Code, including transfers under the Accessibility Program
- Special Priority Program ("SPP")
- Threat to Health and Safety (formerly the 'Crisis Priority' category)
- Underhoused

Overhoused Transfers are included in the Policy but are governed by the rules laid out in the City of Toronto's RGI Administration Manual and are subject to the process outlined in a report <a href="TCHC:2024-14:">TCHC:2024-14: "Process Update – Overhoused Households"</a>, presented to the TSC and the Board in Q1 2024.

Relocation Transfers, with the exception of temporary transfers under the Accessibility/Unit Modification Program, are governed by TCHC's Relocation Policy and are not subject to the Tenant Transfer Policy.

TCHC does not provide transfers to tenants for reasons not covered by the above transfer categories; tenants wishing to transfer for non-priority reasons are directed to the Centralized Waiting List, administered by the Access to Housing team at the City of Toronto.

The revised Tenant Transfer Policy and Procedure captures all required transfer categories as laid out in provincial legislation (Accommodation under the Human Rights Code and SPP) and the direction and/or authority given to TCHC by the City of Toronto as Service Manager (Threat to Health and Safety and Underhoused)

#### **Consultations**

Consultations were conducted with a broad range of tenants, staff, and stakeholders, and were completed in three phases. The first phase occurred in Q1 2024 and centered on gathering feedback through questions and discussion on TCHC's Human Rights Complaint Process and its relationship with TCHC's Priority Transfer Program in addressing Human Rights concerns.

The second phase of consultations in Q3 2024 gathered feedback specifically on the Tenant Transfer Process, including accommodation and underhoused transfers. This phase included questions related to issues with the current program and encouraged suggestions for improvements.

The third phase of consultations included engagement with Personal Accessibility in Toronto Housing ("RPATH"), the TCHC Tenant Advisory

Committee, Responsible the City of Toronto's Housing Secretariat team in their role as Service Manager, Ombudsman Toronto, and a final consultation with front line staff in Tenancy Management and the centralized Transfer team who works directly with the Policy and Procedure.

More details about the consultations and the feedback received are outlined in Attachment 3.

### Significant Changes in Revised Policy and Procedure

#### Issue: Strict Eligibility Criteria

Key feedback received during the consultations related to the strict eligibility criteria of the Priority Transfer Program. These criteria were implemented by TCHC following the investigation into the program by the Toronto Ombudsman ("Ombudsman") in 2018.

**Resolution:** The revised Policy and Procedure includes flexibility to consider the diverse challenges faced by TCHC tenants. The changes ensure that transfers are facilitated in cases where there is a clear risk to health and safety that would be mitigated by a transfer, particularly when tenants' safety concerns arise just outside the boundaries of a TCHC property, but where the safety risk connected to the unit and/or community is still present.

#### Issue: Lack of Mechanism for Review of Decisions

Management received feedback related to the procedural review process and the need to include the ability for tenants to request a review of the transfer decision.

**Resolution:** The revised Policy and Procedure now include a mechanism for appealing transfer decisions, in addition to reviewing procedural compliance. Appeals and procedural reviews will be conducted by a Transfer Review Committee, consisting of staff from Operations and Legal Services.

## Issue: Required Documentation Creates Barriers

The existing Policy and Procedure rely heavily on third-party documentation such as Toronto Police Services ("TPS") Reports, Medical Questionnaires, and Community Support Letters. However, determining the weight of each document in decision-making poses a challenge for the Intake Specialists when assessing applications.

For instance, in cases where there is a threat to health and safety, heavy reliance on TPS Reports may be problematic for communities or tenants with negative experiences or safety concerns. Additionally, the TPS procedure can be restrictive in what information is shared with TCHC due to privacy concerns and ongoing legal cases.

**Resolution**: The revised Policy and Procedure includes a wider range of documentation and information that can be considered as part of the decision-making process, to include personal statements, feedback from TCHC staff, affidavits, third-party letters from community organizations, or any other credible evidence that supports the tenant's claim.

The Policy revisions direct staff to consider the consistency and credibility of the information provided, and the full range of information when making decisions on whether a tenant is eligible for a transfer. This approach recognizes the diverse realities faced by tenants and allows for a more holistic evaluation of each case.

## Issue: Lack of Clear Alignment with TCHC's Accessibility and Unit Modification Program

Feedback from both tenants and R-PATH indicated misalignment between the Transfer Policy and Procedure and the Accessibility and Unit Modification Program.

**Resolution:** Transfers for unit modification and physical accessibility purposes are facilitated by TCHC in compliance to the Ontario Human Rights Code. The revised Policy clarifies and expands the category described under 'Accommodation' and includes streamlined language to support staff and tenants to understand how and why TCHC approves Accessibility-related transfers. The Transfer Procedure in particular will need to be revised and adjusted as upcoming changes to the Accessibility Policy are finalized and implemented over the next 12 to 18 months.

## Issue: Inclusion of Underhoused as a Transfer Category

Underhoused transfers are permitted by the Service Manager, at the discretion of the Housing Provider. Under this allowance, Housing Providers must place Underhoused transfer as the lowest priority of internal transfer. Due to the continued and significant issues with low unit supply, TCHC initially considered excluding this category from the revised Policy.

**Resolution:** Based on the feedback from tenants and stakeholders advocating for its inclusion, TCHC has retained it as a category, defining it as households Underhoused by two or more bedrooms in accordance with the RGI Occupancy Standards.

Additionally, the updated Policy and Procedure now recognizes severely overcrowded households within the Threat to Health and Safety category. Severe overcrowding is defined in accordance with the occupancy standards laid out in the Toronto Municipal Code Chapter 629, Property Standards.

These changes provide a clearer pathway for households experiencing severe overcrowding and underhoused, allowing them to move to safer and more appropriately sized units.

## Issue: Affordable and Market Tenants Lack Access to Crisis Priority (Threat to Health and Safety) Transfers

An issue raised by tenants and the City of Toronto's Housing Secretariat team is focused on the lack of access that tenants in Market and Affordable units have to the 'Crisis Priority' Transfer category (now the Threat to Health and Safety Transfer category). These tenants face similar challenges related to being victims of violent incidents and other criteria in this category as RGI tenants do. This restriction was creating barriers to these tenants living safely in their homes.

**Resolution:** To address this issue, the policy revisions ensure that tenants are treated equitably across the Accommodation and Threat to Health and Safety transfer categories, regardless of whether they are living in and RGI, Market or Affordable unit.

## Issue: Lack of Choice in Unit Matching Process and Extended Wait Times

During consultations, tenants highlighted the excessive wait time for unit offers, once approved for a transfer. The Tenant Transfer Program relies on available vacant units to facilitate transfers, but the shortage of such units due to TCHC's historically low vacancies amid Toronto's housing crisis, impedes the program's ability to promptly offer appropriate accommodation. Instead, unit offers are based solely on availability without allowing for a formal choice-based system. Informally, program staff inquire about tenants' area of preference, but specific parameters regarding preferred areas prolong the transfer process as does the absence of choice which often leads to unit refusals, extended waits, or files closed without a transfer.

**Resolution:** The revised Tenant Transfer Procedure incorporates opportunities for tenants to express their preferences when approved for a transfer. Tenants who impose more restrictions on unit type and location should expect longer wait times, while tenants with broader preferences may be matched with a unit more quickly.

Additionally, the implementation of a planned IT solution to manage TCHC's internal waiting list will enable more efficient unit matching and much easier access for tenants to review the status of their application without relying on phone calls and emails to staff. This IT solution, once implemented, will enable tenants to move more quickly through the process and will allow for enhanced autonomy and access to information as tenants navigate the transfer process.

#### **Consultation Feedback Not Addressed**

Due to the constraints that TCHC is under related to legislation and rules related to RGI Administration, as well as constraints related to the number, location and size of units that become vacant, there remain a few areas that we have not been able to address in the policy and procedure revisions. These areas include:

- Significantly improving the timelines for tenants to transfer to their new unit
  - The rate at which new units become available has been consistently low over the past several years and there is no reason to believe that this will change. This means that we will continue to struggle to move approved tenants quickly to new units. In particular, tenants who need larger units sizes often face significant wait times due to the low availability of these unit sizes in the portfolio. Tenants who have an urgent need to move are encouraged by program staff to be flexible in their geographical preferences.
- Increase the priority of underhoused tenants and consider transfers for tenants who are underhoused by only one bedroom.
  - The priority of Underhoused tenants is set by the City of Toronto and TCHC is not able to make a change to the priority in this area. Additionally, TCHC's decision to maintain the definition of Underhoused at 'two or more bedrooms' aims to ensure that the limited units are available for the tenants who are the most Underhoused.
- Provide transfers for tenants who want to move for other reasons (nonpriority' transfers)
  - O Due to the low availability of units and the significant need for the transfer categories outlined in this Policy, TCHC does not have the ability to enable transfers for other reasons. Tenants who wish to transfer to a different unit have the option to apply through the Centralized Waiting list managed by the City of Toronto's Access to Housing team.

#### Implementation Plan

Policy revision of this scale requires significant implementation planning and intervention. Following the approval of the Policy, Management will proceed to roll out the implementation plan as follows:

Item	Notes	Timeline	
Process	<ul> <li>Finalize Standard Operating         Procedure for Transfer Team and         Tenancy Mgmt Teams     </li> </ul>	May-Jun 2025	
	<ul> <li>Develop decision-making checklists for Transfer team</li> </ul>		
	- Develop and implement Decision Review Committee		
	<ul> <li>Revise all forms and questionnaires to align with the Policy and Procedural revisions</li> </ul>		
Communications and Change Management	- Finalize comprehensive Communications Plan	Comms Plan - May 2025	
	- Implement Information Sessions for tenants, staff and stakeholders	,	
	- Revise and roll-out all Program communications materials (e.g., brochures, website info, etc.)	Info sessions - June – Sep 2025	
Technology	<ul> <li>Continue working with ITS to scope, plan and implement a technological solution to more efficient management of TCHC's internal waiting list</li> </ul>	Mar-Oct 2025	

Implementation will be conducted with ongoing engagement and input from front-line staff and stakeholder groups, especially RPATH with respect to how the Policy and Procedure align with the Accessibility and Unit Modification Program.

#### **IMPLICATIONS AND RISKS:**

TCHC is committed to upholding our responsibilities under the Human Rights Code. The revised Tenant Transfer Policy and associated Procedure aims

to achieve a more balanced assessment of internal transfer requests by considering a diverse range of evidence and enabling a thorough and fair review of each unique situation. While this approach may result in an increase in transfer requests and acceptances, it could also lead to a longer transfer waitlist due to limited unit availability. Despite the challenges, TCHC remains committed to reducing the current waitlist and will continue to manage it effectively, recognizing the importance of meeting tenants' needs. Following the launch of the Tenant Transfer Procedure, TCHC will closely monitor waitlist statistics to identify any potential emerging issues.

#### **SIGNATURE:**

"Nadia Gouveia"	
Nadia Gouveia	
Chief Operating Officer	

#### ATTACHMENTS:

- 1. Tenant Transfer Policy
- 2. Tenant Transfer Procedure
- 3. Summary of Tenant Transfer Policy Consultation Results
- 4. Tenant Transfer Policy Presentation

#### **STAFF CONTACT:**

Lindsay Viets, Operational Planning and Program Services 416-676-7155 Lindsay.Viets@torontohousing.ca Item 12G – Tenant Transfer Policy Public TSC Meeting – April 15, 2025

Report #: TSC:2025-12

Attachment 1





## **Tenant Transfer Policy**

**Procedure Owner:** Operations

**Approval:** Board of Directors

First Approved: July 2006

**Effective Date:** [pending Board approval]

## **Policy Statement**

TCHC is committed to providing safe and secure housing to Tenants. To meet this goal and its legal obligations, TCHC may transfer Tenants from one TCHC unit to another.

Transfers are one of many tools that TCHC will use to support Tenants to live safely in a TCHC unit. A transfer is not always an appropriate solution to a challenging situation a Tenant is facing. Tenants will only be transferred if it is determined under the criteria in this Policy that they can no longer live in their current unit. All transfers must comply with the Housing Services Act, the Human Rights Code, City of Toronto By-Laws and other applicable legislation and guidelines.

The purpose of this policy is to set out the circumstances in which TCHC will transfer Tenants and how Tenants will participate in the process. This Policy should be read together with TCHC's Transfer Procedure.

## Scope

The policy applies to all TCHC Tenants (as defined in this policy), who require a move to a different TCHC unit for the following reasons:

- Accommodation under the Human Rights Code
- Special Priority Program
- Threat to Health and Safety
- Underhoused
- Overhoused



This Policy does not apply to Tenants relocating between TCHC units for renovation, repairs or redevelopment of their Current Unit, except as part of a transfer under the Accessibility Program.

This policy does not apply to Agencies, or their tenants, who are operating in TCHC units under a Head Lease.

#### **Definitions**

- "Accessibility Program" means the TCHC program that meets
  Tenants' physical accommodation needs, as identified in the TCHC
  Medical Questionnaire completed by a qualified healthcare provider,
  by modifying the unit to increase physical accessibility of the current
  unit or permanently transfers Tenants to units that have been made
  accessible for that specific Tenant.
- 2. "Affordable Rent Tenant" means a Tenant in a TCHC unit who is not an RGI Tenant but who is paying below-market rent and lives in a designated Affordable Housing unit governed by the City of Toronto's Affordable Housing Program
- 3. "Current Unit" means the unit the Tenant lives in prior to transferring to a different unit.
- 4. "Head Lease" means an agreement through which TCHC leases unit(s) to a third-party support agency ("the Agency") who then subleases the unit(s) to their tenants, where the Tenant pays their rent to the Agency. Residents living in a unit subject to a headlease are tenants of the Agency, not TCHC.
- 5. "Housing Services Act" means the *Housing Services Act, 2011*, SO 2011, c. 6, Sched. 1.
- 6. "Human Rights Code" means the Ontario *Human Rights Code*, RSO 1990 c. H.19.
- 7. "Independent Living Agency" refers to a service provider that provides services that assist people with disabilities to live independently.
- 8. "Independent Living Tenants" means Tenants of TCHC living in units covered by a referral agreement and receiving services from an Independent Living Agency.



- 9. "Intimidated Victim" means a Tenant who:
  - has faced violence or intimidation that a Law Enforcement Agency or the Crown confirms amounts to a breach of the Criminal Code; and
  - TCHC confirms is under threat of death or Serious Injury where the threat would persist should the Tenant remain in the Current Unit.
- 10. "Intimidated Witness" means a Tenant who
  - a Law Enforcement Agency or the Crown confirms is a witness in active law enforcement proceedings or an active investigation and
  - who TCHC confirms is cooperating with a Law Enforcement Agency or the Crown in the anticipated arrest or prosecution of an individual accused of committing a crime in relation to the law enforcement proceedings or investigation; and
  - as a result of cooperating with a Law Enforcement Agency or the Crown, the witness will suffer threat of death or Serious Bodily Injury and the threat would persist should the Tenant remain in the Current Unit.
- 11. "Law Enforcement Agency" is all municipal, provincial, and federal police services in Canada. This includes the Toronto Police Service, Ontario Provincial Police, Royal Canadian Mounted Police and Toronto Community Housing's Community Safety Unit, and other Special Constable or security organizations.
- 12. "Market Rent Tenant" is a Tenant in a TCHC unit who pays market rent, or who pays below market rent governed by the City's of Toronto's Average Market Rent Allowances.
- 13. "Referral Agreement" is a contract between TCHC and an Agency to fill RGI units with clients receiving services from a particular Agency's waitlist. The Agency must have an individual service agreement with the Tenant to provide ongoing services (TCHC is not a party to that service agreement). These Tenants pay their rent directly to TCHC and are TCHC Tenants.
- 14. "**RGI Tenant**" is a Tenant who is paying rent in an amount geared to their income per the rules in the Housing Services Act.



- 15. "Serious Injury" means an injury that was life-threatening or serious to the extent that it results in significant professional medical intervention and/or recovery time and/or is disabling, for example, multiple broken bones, or a serious concussion.
- 16. "Severe Overcrowding" is when the number of Tenants in the unit exceeds the size allowed under the <u>Toronto Municipal Code, Chapter 629, Property Standards</u>, whereby the maximum number of people living in a habitable room cannot exceed one person for each nine square metres of habitable room floor area.
  - "TCHC" means Toronto Community Housing Corporation.
- 17. "Tenant" means a person who has signed the lease for a given unit with TCHC, and the authorized occupants of a unit, including children of the household and tenants who receive services from an Independent Living Organization. This does not include:
  - individuals who are present in a unit as guests of a tenant
  - individuals living in a unit as an approved caregiver to a tenant; or
  - tenants of a third-party service provider under a Head Lease with TCHC.
- 18. "Transfer Review Committee" means a single committee that reviews all files at the request of the Tenant no matter the region. They review the transfer decision as set out in the Procedure. The Tenant has the right to present their position on the decision to the Committee. The Committee is responsible for communicating their final decision and rationale in writing to the Tenant.
- 19. "Traumatic Incident" means a violent incident resulting in Serious Injury, a death, a suicide, or an attempted suicide where emergency medical intervention was required and provided, and where either:
  - the incident occurred inside the Current Unit rented by the Tenant requesting a Transfer, or
  - if the victim of the Traumatic Incident was the Tenant requesting the Transfer or another authorized Tenant who occupied the Current Unit with the person requesting a Transfer, the incident



occurred anywhere on the residential complex or an adjacent TCHC residential complex.

#### **Reasons for Transfer**

TCHC will transfer Tenants under the below circumstances and only where it is necessary because they can no longer live in their Current Unit. TCHC will not transfer Tenants for any other reason, except in exceptional circumstances where the Tenant does not meet the criteria for a transfer, but it is nonetheless necessary to ensure their safety.

Tenants may qualify for a transfer under multiple categories and are not required to submit separate transfer applications for each category.

## Accommodation under the Human Rights Code

Where a Tenant must transfer due to an accommodation need related to medical need and/or grounds protected by the Human Rights Code, and the transfer does not create an undue hardship on TCHC. This includes <a href="Accessibility Program">Accessibility Program</a> transfers that are approved according to the requirements outlined in the <a href="TCHC Medical Questionnaire">TCHC Medical Questionnaire</a>. For more information for tenants about how Accessibility Program related transfers are administered, see the <a href="Accessibility Program">Accessibility Program</a> page on TCHC's website and the Responsible Personal Accessibility in Toronto Housing's (RPATH) 'Accessibility is for You' package.

## Special Priority Program

Where a Tenant is a current or recent victim of domestic abuse and/or human trafficking in their Current Unit based on the rules and assessment criteria set out in the Housing Services Act. The City of Toronto's Access to Housing team is responsible for the application process and assessing Tenants' eligibility for Special Priority Program status. TCHC's Internal Transfer team is responsible for sourcing and offering units to current TCHC Tenants approved for SPP transfers. According to the rules outlined in the Housing Services Act and the City of Toronto's RGI Administration



Manual, Special Priority Program transfers receive the highest priority for internal transfers under this Policy.

#### Threat to Health and Safety

Where a Tenant must transfer because all the following criteria are met:

- they are facing a direct, immediate, elevated and acute risk to their health and/or safety;
- They are facing that risk because they are an Intimidated Victim, Intimidated Witness, because of a Traumatic Incident and/or due to Severe Overcrowding; and
- the risk can only be addressed by moving from their Current Unit to another TCHC unit.

#### Overhoused

Where an RGI Household is living in a unit that has more bedrooms than allowed for the number of authorized Tenants living in the unit per the rules set out in the RGI Administration Manual. Overhoused transfer are managed through a process governed by the RGI Administration Manual and are facilitated through collaborative work between TCHC staff in the Regional Tenancy management teams and the City's Centralized waiting list program (RentCafé). Market Tenants and Affordable Tenants are not eligible for Overhoused transfers.

#### Underhoused

An RGI Household is under-housed if their unit has fewer bedrooms than the City's Local Occupancy Standards for RGI Households allows. For the purposes of eligibility for an underhoused transfer under the policy, the Household must be underhoused by two or more bedrooms, according to the Local Occupancy Standards for RGI Households. Market and Affordable Tenants are not eligible for Underhoused transfers. According to the rules outlined in the Housing Services Act and the City of Toronto's RGI Administration Manual, Underhoused transfers receive the lowest priority for internal transfers under this Policy.

## How TCHC will meet its obligations

TCHC will transfer Tenants when they qualify for one or more of the above categories of transfer, and a transfer to a different unit is the only way of addressing the issues they are facing in their Current Unit. When a Tenant is denied a transfer because they do not qualify or TCHC determines that the issues can be resolved in their Current Unit, TCHC will continue to work with the Tenant to try and resolve those issues.

TCHC will follow the related Tenant Transfer Procedure and its obligations under the Housing Services Act and Human Rights Code when making decisions about transferring Tenants. The Tenant Transfer Procedure sets out the process, eligibility criteria and requirements for Tenants when they request a transfer.

While a Tenant may have been approved for a transfer, due to limited housing stock, TCHC cannot guarantee the Tenant will be transferred to another unit immediately or within any particular timeframe. Further, while the Tenant Transfer Procedure does include a process for Tenants to select geographic preferences for their transfer unit, TCHC cannot guarantee a Tenant a transfer to a particular housing complex or area of the city.

Tenants who disagree with their transfer decision may request that TCHC's Transfer Review Committee review the decision.

## **Compliance and Monitoring**

This policy will be reviewed periodically to ensure it remains effective and aligns with legal and best practice standards, and in alignment with the timelines set out in TCHC's Policy Management Framework. The Director, Operations Planning and Program Services, is responsible for overseeing the implementation and compliance with this Policy.

## **Related Policies and Procedures**

- Tenant Transfer Procedure
- Accessibility Policy



- Relocation Policy
- Tenant Human Rights Policy
- Tenant Human Rights Complaint Procedure
- Vulnerability Definition Policy

## **Relevant Legislation**

- Residential Tenancies Act
- Housing Services Act
- Human Rights Code
- Accessibility for Ontarians with Disabilities Act

### **Commencement and Review**

Revision	Date	Description of changes	Approval
First approval:	July 2006	New	Board of Directors
Revision #1	July 2018	Updated for addition of Crisis priority transfer category, replacement of "Medical Priority" with Accessibility/ Accommodation, and elimination of "Safety at Risk" priority category and nonpriority category	Board of Directors
Last review:	Tbd	Updates to transfer reasons and eligibility requirements	Board of Directors

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Attachment 2





## **Tenant Transfer Procedure**

**Procedure Owner:** Operations

Approval: ELT

**First Approved:** [tbc – pending ELT approval]

Effective Date: [tbc]

#### **Procedure Statement**

TCHC is committed to providing safe and secure housing to Tenants. To meet this goal and its legal obligations, TCHC will sometimes transfer Tenants from one TCHC unit to another.

Transfers are one of many tools that TCHC will use to support Tenants to live safely in a TCHC unit. A transfer is not always an appropriate solution to a challenging situation a Tenant is facing. Tenants will only be transferred if they can no longer live in their current unit. All transfers are subject to compliance with the Housing Services Act, the Human Rights Code, City of Toronto By-Laws and other applicable legislation and guidelines.

The purpose of this procedure is to set out the process TCHC will follow when transferring Tenants between units.

## Scope

The procedure applies to all TCHC Tenants (as defined in this procedure) who require a move to a different TCHC for the following reasons:

- Accommodation under the Human Rights Code, including transfers under the Accessibility Program
- Special Priority Program
- Threat to Health and Safety
- Underhoused
- Overhoused



#### a. Exemptions

This procedure does not apply to:

- Tenants relocating between TCHC units for renovation, repairs or redevelopment of their Current Unit, except as part of a transfer under TCHC's Accessibility Program; and
- Tenants who live in a unit operated under a Head Lease.

#### b. Partial Exemptions

- Sections 1-4, 7, and 10 of this procedure do not apply to
  - Tenants approved for Special Priority Program transfers which are administered and approved by <u>MyAccesstoHousingTO</u> which is part of the City of Toronto. TCHC does not have any control over the assessment or approval of these applications; and
  - Tenants who TCHC is transferring because they are Overhoused.
- Affordable and Market Tenants are not eligible for Underhoused Transfers.

## **Definitions**

- 1. "Accessibility Program" means the TCHC program that meets Tenants' physical accommodation needs, as identified in the TCHC Medical Questionnaire completed by a qualified healthcare provider, by modifying the unit to increase physical accessibility of the current unit or permanently transfers Tenants to units that have been made accessible for that specific Tenant.
- 2. "Affordable Rent Tenant" means a Tenant in a TCHC unit who is not an RGI Tenant but who is paying below-market rent and lives in a designated Affordable Housing unit governed by the City of Toronto's Affordable Housing Program
- **3.** "Current Unit" means the unit the Tenant lives in prior to transferring to a different unit.



- **4.** "Good Standing" means the Tenant,
  - owes no money to TCHC for arrears, damages, or overpayment of subsidy in relation to any current or former TCHC unit or, if any money is owing, the Tenant has signed a repayment agreement with TCHC and is complying with the agreement, as well as paying the current rent;
  - The Tenant is not the subject of any legal action against them by TCHC; and
  - TCHC is not considering taking any legal action against the Tenant.
- 5. "Head Lease" means an agreement through which TCHC leases unit(s) to a third-party support agency ("the Agency") who then subleases the unit(s) to their tenants, where the tenant pays their rent to the Agency. Residents living in a unit subject to a headlease are tenants of the Agency, not TCHC.
- **6.** "Housing Services Act" means the *Housing Services Act, 2011*, SO 2011, c. 6, Sched. 1.
- **7.** "Human Rights Code" means the Ontario *Human Rights Code*, RSO 1990 c. H.19.
- **8.** "Independent Living Agency" refers to a service provider that provides services that support people with disabilities to live independently.
- **9.** "Independent Living Tenants" means Tenants of TCHC living in units covered by a referral agreement and receiving services from an Independent Living Agency.
- **10.** "Intimidated Victim" means a Tenant who:
  - has faced violence or intimidation that a Law Enforcement Agency or the Crown confirms amounts to a breach of the Criminal Code; and
  - TCHC confirms is under threat of death or Serious Injury where the threat would persist should the Tenant remain in the Current Unit.



- 11. "Intimidated Witness" means a Tenant who
  - a Law Enforcement Agency or the Crown confirms is a witness in active law enforcement proceedings or an active investigation and
  - who TCHC confirms is cooperating with a Law Enforcement Agency or the Crown in the anticipated arrest or prosecution of an individual accused of committing a crime in relation to the law enforcement proceedings or investigation; and
  - as a result of cooperating with a Law Enforcement Agency or the Crown, the witness will suffer threat of death or Serious Injury where the threat would persist should the Tenant remain in the Current Unit.
- 12. "Law Enforcement Agency" is all municipal, provincial, and federal police services in Canada. This includes the Toronto Police Service, Ontario Provincial Police, Royal Canadian Mounted Police and Toronto Community Housing's Community Safety Unit, and other Special Constable or security organizations.
- **13.** "Market Rent Tenant" is a Tenant in a TCHC unit who pays market rent, or who pays below market rent governed by the City's of Toronto's <a href="Average Market Rent Allowances">Average Market Rent Allowances</a>.
- **14.** "Municipal Ward" is a specific geographical area within the City of Toronto that is represented by a member of City Council. Ward boundaries are set by the City of Toronto and can be found on the City of Toronto website.
- 15. "Referral Agreement" is a contract between TCHC and an Agency to fill RGI units with clients receiving services from a particular Agency's waitlist. The Agency must have an individual service agreement with the Tenant to provide ongoing services (TCHC is not a party to that service agreement). These Tenants pay their rent directly to TCHC and are TCHC Tenants.
- **16.** "**RGI Tenant**" is a Tenant who is paying rent in an amount geared to their income per the rules in the Housing Services Act.



- 17. "Serious Injury" means an injury that was life-threatening or serious to the extent that it results in significant professional medical intervention and/or recovery time and/or is disabling, for example, multiple broken bones, or a serious concussion
- **18.** "Severe Overcrowding" is when the number of Tenants in the unit exceeds the size allowed under the <u>Toronto Municipal Code</u>, <u>Chapter 629</u>, <u>Property Standards</u>, whereby the maximum number of people living in a habitable room cannot exceed one person for each nine square metres of habitable room floor area.
- 19. "TCHC" means Toronto Community Housing Corporation.
- **20.** "Tenant" means a person who has signed the lease for a given unit with TCHC, and the authorized occupants of a unit, including children of the household and tenants who receive services from an Independent Living Organization. This does not include:
  - individuals who are present in a unit as guests of a tenant
  - individuals living in a unit as an approved caregiver to a tenant; or
  - tenants of a third-party service provider under a Head Lease with TCHC.
- 21. "Transfer Review Committee" means a single committee that reviews all files at the request of the Tenant no matter the region. They review the transfer decision as set out in this Procedure. The Tenant has the right to present their position on the decision to the Committee. The Committee is responsible for communicating their final decision and rationale in writing to the Tenant.
- **22.** "Traumatic Incident" means a violent incident resulting in Serious Injury, a death, a suicide, or an attempted suicide where emergency medical intervention was required and provided, and where either:
  - the incident occurred inside the Current Unit rented by the Tenant requesting a Transfer, or
  - if the victim of the Traumatic Incident was the Tenant requesting the Transfer or another authorized Tenant who occupied the Current Unit with the person requesting a Transfer, the incident



occurred anywhere on the residential complex and/or adjacent residential complex.

## 1. Eligibility Criteria

#### a. General

To qualify for a transfer, Tenants must meet the following criteria:

- Nothing short of a transfer will address the issues they are facing in their Current Unit.
- The Tenant must work with TCHC staff and any external persons or organizations to obtain all the information necessary to decide if they qualify for a transfer.
- Tenants must be in Good Standing to be eligible for a transfer unless the transfer is required per TCHC's obligations under the Human Rights Code.

## b. Accommodation under the Human Rights Code

Where a Tenant must transfer due to an accommodation need related to accessibility, a medical need and/or another ground(s) protected by the Human Rights Code, and the transfer does not create an undue hardship on TCHC. This includes Accessibility Program transfers that are approved according to the requirements outlined in the <a href="TCHC Medical Questionnaire">TCHC Medical Questionnaire</a>. For more information for Tenants about how Accessibility Program related transfers are administered, see the <a href="Accessibility Program">Accessibility Program</a> page on TCHC's website and the Responsible Personal Accessibility in Toronto Housing's (RPATH) 'Accessibility is for You' package.

## c. Threat to Health and Safety

Where a Tenant must transfer because all the following criteria are met:

• They are facing a direct, immediate, elevated and acute risk to their health and/or safety;



- They are facing that risk because they are an Intimidated Victim, Intimidated Witness, because of a Traumatic Incident and/or due to Severe Overcrowding; and
- The risk can only be addressed by moving from their Current Unit to another TCHC unit.

When determining if the threat to a Tenant would persist if they were to remain in their Current Unit, TCHC may consider the following factors, based on the information provided by the Tenant:

- there is a violation of a restraining order that protects the Tenant;
- if there was a single incident, it must be a very serious incident;
- if multiple incidents establish a pattern of harassment and/or intimidation towards the Tenant;
- the Tenant who is the subject of the transfer request is vulnerable (as defined in TCHC's Vulnerability Definition Policy);
- whether Operations Staff have exhausted tenancy management options or they are inappropriate in the circumstances; and
- any other factor TCHC deems relevant.

In determining if a witness is cooperating, TCHC may consider:

- Confirmation from the Crown or Victim's Services that the Tenant will testify as a witness;
- A summons or other notice from the court requiring the Tenant to testify; and
- Any other information TCHC deems relevant.

#### d. Underhoused

An RGI Tenant is Underhoused if their unit has fewer bedrooms than the City's Local Occupancy Standards for RGI Tenants allows. For the purposes of eligibility for an underhoused transfer under the policy, the Tenant must be underhoused by two or more bedrooms, according to the Local Occupancy Standards for RGI Tenants. As stated in the RGI Administration Manual, TCHC must place Underhoused transfers as the lowest priority for internal transfers. The Underhoused transfer category does not apply to Market and Affordable Tenants.



#### 2. Documentation

#### a. Supporting Information - General

To request a transfer under this Procedure, a Tenant will submit a Transfer Request Form. Depending on the nature of the issue, TCHC may ask the Tenant to submit further documentation to determine the appropriate course of action which could include a transfer. Tenants must cooperate with these requests for information. If they do not, TCHC may conclude that it does not have enough information to proceed with a response and close the file deeming the application abandoned by the Tenant.

TCHC may ask for any of the following documentation to decide if a Tenant qualifies for a transfer:

- TCHC's medical questionnaire;
- Supporting medical documentation such as a letter from a registered health practitioner;
- Police reports or court orders;
- Reports from Victim's Services
- Witness or other corroborating statements with a signed affidavit; and/or
- TCHC Incident Reports and statements made by onsite staff
- CSU Reports
- Any other information that is necessary to determine if they qualify for a transfer

While investigating and arriving at a decision a combination of the above will be considered. The program will prioritize the credibility and consistency of the supporting documents provided, rather than focusing solely on specific types of documentation. This approach recognizes the diverse realities faced by Tenants and allows for a more holistic evaluation of each case.



## 3. Assessing if a Tenant qualifies for a Transfer

#### a. Meeting with Tenant

Based on the Transfer Request Form and Supporting Information, TCHC staff will contact the Tenant to invite them to a meeting. TCHC staff will first attempt to contact the Tenant by phone. If that is unsuccessful staff will send a letter inviting the Tenant to a meeting and advising them to respond within 10 business days. If the Tenant does not respond in that timeframe, TCHC will contact the Tenant's local Tenant service office to inquire if site staff are in contact with the Tenant. If the Tenant does not respond and is not in contact with site staff, TCHC may determine that the Tenant has abandoned their transfer request and may close their request.

During the initial meeting, the following will take place:

- The Intake Specialist will explain the transfer process and the requirements for supporting information and documentation, if relevant;
- the obligations of the Tenant under this procedure and the Transfer Policy;
- · discuss the issues the Tenant is facing; and
- accept any relevant documentation from the Tenant.
- If not already provided by the Local Tenant Service team, provide a Transfer Information Sheet to help further explain the process.

## b. Reviewing documentation

Once TCHC has received all necessary information and the Tenant has confirmed there is no additional information they want to share, staff will review that information to determine if the Tenant qualifies for a transfer. To determine if a Tenant qualifies, TCHC will consider if the available information meets the criteria for a transfer. TCHC may ask for further information once it has reviewed the already available information.

If it is clear in reviewing the documentation that the request may be eligible for the Accessibility Program, staff will refer the file to the Accessibility team, provided a medical questionnaire has been completed as part of the transfer request. If a medical questionnaire has not been completed, the



regional staff will work with the Tenant to submit a medical questionnaire. A letter will then be sent to the Tenant advising them that their file has been forwarded to the Accessibility Program for review, and if relevant, will outline the need to complete a medical questionnaire.

### c. Summary Dismissal

TCHC may determine that a Tenant does not qualify for a transfer without meeting with the Tenant or doing a full review of the available information, if:

- The person making the request is not a Tenant;
- The facts, on their face, do not meet the criteria for any of the transfer categories;
- TCHC requests additional information from the Tenant but does not receive it within 30 days of the request;
- The request is substantially similar to a previous approved transfer request where the Tenant declined all offers made to them and the transfer request was closed as a result;
- The facts underlying the request are substantially similar to those in a previous request where the Tenant did not qualify for a transfer; and/or
- The facts underlying the request are substantially similar to those in a previous request where the Tenant did qualify for a transfer and it does not appear approving a subsequent transfer will resolve the Tenant's issues.

#### 4. Decision Letter

Once TCHC has decided whether a Tenant qualifies for a transfer, it will send the Tenant a decision letter within five days of making the decision that explains:

- if they were approved or denied for the transfer;
- the information that was used to make that decision;
- a rationale for the decision; and



any information about next steps.

#### a. Special Information about Transfer Request Denials

- If the transfer request is denied, the Tenant will have 30 calendar days from the date of the decision letter to provide additional information to the staff indicated in their decision letter, in support of their application.
  - TCHC will accept late reconsideration submissions of additional information where the Tenant was unable to submit the information for reasons beyond their control or because of an accommodation need under the *Human Rights Code*.
- If the staff who wrote the denial letter does not reverse their decision after receiving the new information, the Tenant can request a review of the case by the Transfer Review Committee.
- In cases where a transfer is denied, the denial letter will explain how the Tenant will be connected with regional staff to address the issue which initiated the application. This support could be internal i.e. a maintenance issue or with a Community Support Coordinator to explore external community supports.

#### 5. Unit Offers

Tenants are required to identify all unit accommodation and accessibility needs. This is reported to the Intake Specialist and/or the Accessibility Coordinator

All Tenants approved for a transfer will be required to select one or more municipal wards that they would like to move to.

Tenants will be supported by an Intake Specialist and/or Accessibility Coordinator to determine their ward preferences. TCHC's Transfer team staff will make sure that those preferences are tracked in TCHC's internal system and that these preferences are considered whenever possible when offering units.

For unit offers under the Accessibility Program only, if a Tenant refuses a unit because it doesn't meet their approved accommodation, the Tenant



will stay on the transfer list with their original request date. If they choose to accept a transfer to a unit that does not meet all their accommodation needs, they will remain eligible for a further transfer to a unit that better meets their medical needs when one becomes available.

TCHC will provide Tenants with up to two unit offers. Unless it is necessary to meet their needs, TCHC cannot guarantee that the Tenant will be transferred to any specific unit or residential complex. TCHC staff may present a unit outside of the Tenants' preferred wards, but these offers will not count towards their two unit offers.

RGI and Affordable Tenants will be offered units that are the correct size for their household based on any applicable occupancy standards and accommodation needs. Market Tenants will be offered a unit that is the same size as their current unit unless they need a different-sized unit for reasons related to their approved transfer.

Tenants will have the option to visit the unit before accepting a unit offer. Tenants will have ten business days to accept or refuse a unit offer. If a Tenant requires additional time to visit a unit before making a decision, TCHC will provide an extension of up to five business days, upon request to the Intake Specialist and/or the Accessibility Coordinator.

If a Tenant refuses all unit offers or does not respond, TCHC will move the Tenant to the bottom of the priority list by chronological date that they declined their final unit offer. When this happens, staff will record all case history on the Tenants transfer request file including:

- offers provided
- reasons for the Tenant declining the offers and/or
- the circumstances of the non-response.

#### 6. Service Standards

TCHC staff will respond to Tenants who submit a transfer request form to acknowledge they have received the form and to set up a meeting with the Tenant within five business days.

Transfer team staff will then engage with the Tenant and collect all documentation required (for example, medical questionnaire, reports from support agencies, CSU reports).



Once TCHC has received a complete transfer request, including all supplementary materials and documentation that the Tenant wishes to provide, staff will make a decision within five business days.

After a transfer decision has been made, staff will contact the Tenant by the Tenant's preferred communication method (eg phone, email, or mail) within three business days to tell them the decision.

Following this contact, staff will send a letter to the Tenant informing them of the decision and the rationale for the decision on their transfer request (see section 4, above). This letter will include information on the next steps in the process and how to request a review through the Transfer Review Committee.

## 7. Leasing Process

Once a Tenant has accepted the unit offer, the TCHC staff member who approved the transfer will coordinate a leasing appointment with the Tenant Service Coordinator for the unit. The Tenant will be required to sign a lease for the new unit and N11 Agreement to Terminate Tenancy for their Current Unit.

Tenants who are moving out of their Current Unit as part of the Accessibility Program so that their Current Unit can be renovated to meet their accessibility needs will still be required to sign a lease for their new temporary unit. These Tenants will maintain the right to return to their Current Unit when the accessibility modifications have been completed. TCHC will provide the Tenant with a letter outlining their right to return to their previous unit once the renovations are complete.

## 8. Transfer Review (by the Transfer Review Committee)

A Tenant can request a review of their transfer decision if they believe that TCHC has erred in its decision, because:

- TCHC made a procedural error;
- TCHC made the wrong decision based on the available information and the eligibility criteria;



- the Tenant has information that was not included in the initial decision that is relevant to whether they qualify for a transfer;
- the units offered to the Tenant did not meet the needs for which the transfer was approved.

The Transfer Review Committee will decide on review requests and may direct that:

- The transfer decision will be upheld;
- The transfer decision will be overturned and a new decision substituted for it;
- The transfer request will be assessed again in accordance with this procedure;
- An additional unit offer be made for the Tenant; and/or,
- The Tenant be provided with another remedy or resolution as appropriate in the circumstances.

The Transfer Review Committee will communicate their decision to the Tenant in writing, including the information the used to make the decision and the rationale for their decision.

Tenants must submit review requests within 30 days of the date on the transfer decision letter. The decision letter (see section 4, above) will include information about how to request a review.

The Transfer Review Committee will be made up of at least three TCHC staff and will include one representative from Legal Services and one representative from Operations – Program Services. Tenants have the right to present their position to the Committee. This can be done in writing, virtually or in person.

Decisions will be made and communicated to the Tenant within thirty days of the Transfer Review Committee meeting.

All members of the Transfer Review Committee will complete training on the Transfer Policy and this procedure, and TCHC's obligations under the Human Rights Code, and all other relevant legislation, before sitting on the Committee.



#### 9. Unit Modifications

TCHC will make physical modifications to the unit to which a Tenant is transferring if the medical questionnaire completed by the Tenant's healthcare provider establishes that they are necessary for medical accommodation reasons.

To determine if the unit requires modifications and the process for implementing the modifications, TCHC and the Tenant will follow the process in TCHC's Accessibility Program.

#### **Accommodations within Transfer Process**

TCHC will provide accommodation to Tenants who require it to fully participate in these transfer procedures. Accommodations include but are not necessarily limited to:

- Providing language or ASL interpretation and/or translation.
- Extending timelines; and/or
- Meeting in person in a location that meets the Tenant's mobility needs or conducting all communications in writing.

Tenants who believe they require accommodation should advise the TCHC staff member who is managing their request under this Procedure.

## 10. Exceptions in Special Circumstances

In cases where a Tenant does not qualify for a transfer under this procedure and the Transfer Policy but there are still compelling reasons to transfer the Tenant, the case will be referred to the Transfer Review Committee.

The committee will consider the Tenant's circumstances and will review all documentation provided. Special circumstances could include cases where:

 The Tenant's circumstances do not meet the criteria for a transfer but are still so serious that an exception is needed.



- The Tenant is facing significant barriers to accessing the documentation they need to demonstrate they qualify for a transfer.
- The General Manager of the Region where the Tenant lives requests that the Transfer Review Committee review the transfer request.

## **Compliance and Monitoring**

This Procedure will be reviewed periodically to ensure it remains effective and aligns with legal and best practice standards, and in alignment with the timelines set out in TCHC's Policy Management Framework. The Director, Operational Planning and Program Services, is responsible for overseeing the implementation and compliance with this Procedure.

#### Other Related Policies and Procedures

- Tenant Transfer Policy
- Accessibility Policy
- Relocation Policy
- Tenant Human Rights Policy
- Tenant Human Rights Complaint Procedure
- Vulnerability Definition Policy

## **Relevant Legislation**

- Residential Tenancies Act
- Housing Services Act
- Human Rights Code
- Accessibility for Ontarians with Disabilities Act



## **Commencement and Review**

Revision	Date	Description of changes	Approval
First approval:	December 2019	New	ELT
Last review:	Tbd	Revisions to transfer categories, eligibility criteria, required documentation, and overall process	ELT

Item 12G – Tenant Transfer Policy Public TSC Meeting – April 15, 2025

Report #: TSC:2025-12

**Attachment 3** 

## **Summary of Tenant Transfer Policy Consultation Results Consultations - Phase One**

#### Staff Consultations

Meetings were held with each regional management team and regional frontline staff, including Tenant Service Coordinators ("TSCs"), Community Service Coordinators ("CSCs") – Access & Support, Tenant Engagement staff and staff from the Violence Reduction Program, The Center for the Advancement of Black People and Programs and Partnerships.

Key concerns raised included:

- Concerns regarding severely under-housed tenants not being appropriately housed, impacting the health and safety of tenants.
- Concerns about the quantity of over-housed units and their impact on the limited availability of larger units.
- Issues regarding the approval criteria and the heavy reliance on Toronto Police Services ("TPS") reports without involving onsite staff.

## **Tenant Consultations**

Tenant consultations were conducted in the East, West and Central regions along with a virtual session focusing on the Human Rights Complaint Process. During these consultations, the Transfer Program was discussed with tenants.

Key concerns raised during the consultations included:

- Confusion regarding the lack of clarity around the rules and regulations governing transfers and for the requirements for approval.
- Concern about the necessity for police engagement when applying for a transfer under the Crisis Category
- The need for a Trauma-Informed approach in all aspects of the Transfer Program.
- Concerns about the perceived lack of information sharing between program staff and regional front-line teams related to transfer applications for specific tenants.

- Issues raised about the fact that the Transfer Program is only. available to Rent-Geared-to-Income ("RGI") tenants.
- Length of time it takes to secure a unit once approved.

#### Stakeholder Consultations

Additional consultations were held with the Toronto Police Service (TPS) Office to Prevent Violence, City of Toronto's Community Crisis Response Team, The Tenant Advisory Committee, The Chair of the Tenant Services Committee and three of its' members. Key feedback included:

- The TPS Office to Prevent Violence expressed concern about any inclusion in the program revision that would rely on their officers for recommendations and risk corroboration on files instead of solely confirming information on cases.
- The City of Toronto recommended extending Crisis Priority Transfers to tenants in Affordable and Market units, emphasizing the importance of ensuring their safety by providing transfer options.
- It was noted that there is a general absence of tenant-facing information regarding the Priority Transfer Process and necessary steps for approval.

#### **Consultations – Phase Two**

## **Tenant Consultations**

Tenant consultations were conducted in October 2024 and consisted of two virtual open feedback sessions and one in person open feedback session, and an online survey. Staff also took feedback from tenants via email and one-on-one phone discussions, due to the sensitive nature of some of the situations faced by tenants applying for transfers.

Key feedback from tenants includes:

- Priority and accommodation transfers should be open to all tenants, including market and affordable tenants, not just RGI tenants.
- There should be a review process that looks at the decisions made, not just whether the procedure was followed.
- The transfer request form and other program material should be made much more straightforward and easier for tenants to understand

- The procedure does not allow for tenants to have any choice in where they transfer to choice should be made available to tenants who want it.
- The documentation requirements are too strict, especially when it comes to getting police reports to corroborate incidents for the crisis priority category.

#### Feedback from Ombudsman Toronto

Ombudsman Toronto provided input related to the need for clarity in language, consistency in definitions and the importance of making appeals processes clear to tenants.

#### **Consultations – Phase Three**

Consultations in phase three include engagement and significant input in building the final draft of the Policy and Procedure from:

- RPATH;
- impacted front-line staff (Community Services Coordinator, Intake Specialists, Accessibility Coordinators);
- Tenant Advisory Committee;
- Housing Secretariat in their role as Service Manager.

Feedback and input from these groups centered on ensuring that the language in the Policy and Procedure was clear and easy for tenants to understand, and that the procedural steps were very straightforward and included enough detail for staff and tenant to be able to understand exactly how the overall process will happen. RPATH in particular emphasized the important of understanding the concerns, worries and barriers that all tenants face when applying for a transfer, and they were integral in ensuring that the policy and procedure considered the needs and challenges of tenants with disabilities.

All Phase Three groups provided invaluable feedback on how to operationalize and implement the Policy and Procedure and emphasized that staff and tenants need supporting documents including decision-making checklists, informational material, and a much clearer application form. Their input and that of other interested stakeholders and advocates will be sought out as staff undertake the implementation of the Policy and Procedure throughout the remainder of 2025.

Item 12G - Tenant Transfer Policy Public TSC Meeting - April 15, 2025

Report: TSC:2025-12

Attachment 4



# Transfer Policy

**Tenant Services Committee April 15, 2025** 



# Objectives of the program revision













Ensures
equitable
access,
decisionmaking and
unit allocation

Compliant
with all
relevant
legislation,
especially the
Ontario
Human
Rights Code

Mitigates risk of harm to tenants

Promotes tenant autonomy and choice

Easy to understand for tenants, partners and staff

An efficient use of resources, especially unit allocation in a low-vacancy environment

# Transfer categories

Accommodation under Human Rights Code

• Including Accessibility transfers

Threat to Health and Safety (formerly 'Crisis')

Including Severe Overcrowding

Overhoused

Managed separately – TCHC-City process

Underhoused

Lowest internal priority

SPP

Managed separately – assessment done by City

# Consultation and review

**TCHC Tenants** 

R-PATH

Tenant Advisory Committee

TCHC Staff

Board Members Ombudsman Toronto City of Toronto

- Housing
Secretariat

# What we heard: major changes needed

Issue: Strict eligibility criteria

More flexible criteria for Threat to Health and Safety category

Expansion of acceptable corroborating documentation (not just TPS)

Issue: No decision review process

Implementation
of Transfer
Review
Committee for
reviews of
decision-making
and procedure
compliannce

Issue: Lack of tenant choice component

Inclusion of formal tenant choice process – tenants can choose preferred Ward areas to receive offers from

Issue: Lack of mechanism to deal with Underhoused

Severe
Overcrowding
included in Threat
to Health and
Safety category

Inclusion of Underhoused as a priority category

Issue: Inequitable access for Market and Affordable tenants

All tenants have will have access to request Accommodation and Threat to Health and Safety ('Crisis') transfers

# Data overview - 2024

Requests for Transfer – Annual Numbers

## Accommodation

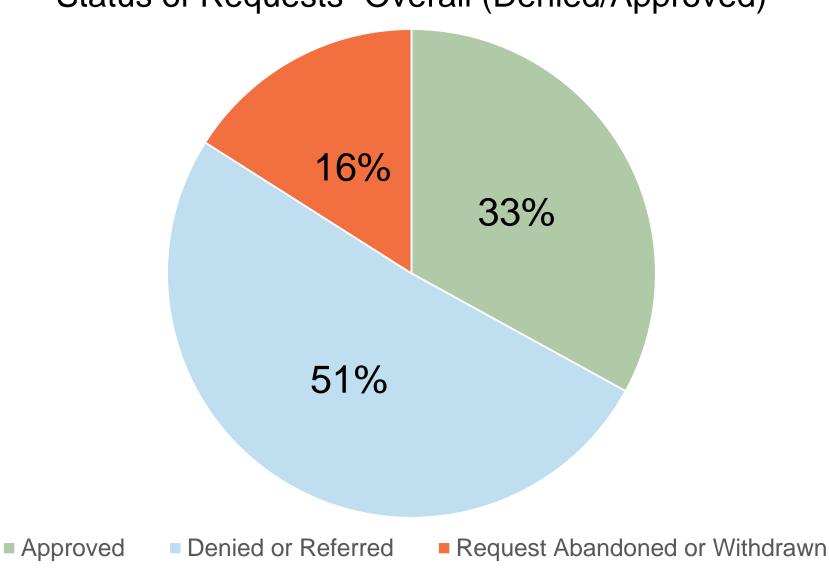
- 44% of transfer requests were for the Accommodation Category
- 671 Requests

## Crisis

- 56% of transfer requests were for the Crisis Category
- 853 Requests

Total: 1524 Requests in 2024





# Next steps – pending approval

- Following approval of Policy by TSC and Board, ELT to approve the Procedure
- Revise all tools, checklists, forms and questionnaires
- Finalize and implement Communications Plan including tenant and staff information sessions, and roll out of communications materials
- Continue working with ITS to scope, plan and implement a technological solution to manage TCHC's internal waiting list (aligned with City's RentCafé system)