

## Request for Decision

### Tenant Engagement Update

Presented To:	Community Services Committee
Presented:	Monday, Aug 12, 2019
Report Date	Friday, Jul 26, 2019
Type:	Managers' Reports

### Resolution

THAT the City of Greater Sudbury approves the Tenant Complaint Process as outlined in the report entitled "Tenant Engagement Update", from the Interim General Manager of Community Development, presented at the Community Services meeting on August 12, 2019.

### Relationship to the Strategic Plan / Health Impact Assessment

This report supports Council's Strategic Plan in the area of Housing by supporting tenant polices and programs that encourage self direction and integration into the wider community. The report also aligns with Population Health Priorities of Families, Resiliency and Housing.

### Report Summary

This report provides an update on the ongoing transition of Greater Sudbury Housing into CGS operations. It includes a summary of the results of tenant engagement meetings, information on ongoing community partnership projects, a draft tenant complaint process and a process to develop a clear and consistent policy on tenants rights and obligations..

### Financial Implications

There are no financial implications associated with this report.

#### Signed By

**Report Prepared By**

Barbara Dubois  
Director, Housing Operations  
*Digitally Signed Jul 26, 19*

**Health Impact Review**

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**Division Review**

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**Financial Implications**

Liisa Lenz  
Coordinator of Budgets  
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**Recommended by the Department**

Ian Wood  
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**Recommended by the C.A.O.**

Ed Archer  
Chief Administrative Officer  
*Digitally Signed Jul 31, 19*

## **EXECUTIVE SUMMARY**

Over the past year, the City of Greater Sudbury has taken over direct responsibility for the administration of Greater Sudbury Housing (GSH). The intent of this change is to bring increased accountability, consistency and transparency to housing operations and, at the same time, achieving underlying goals of supporting the development of neighbourhoods in GSH communities, ensuring that tenants have clear avenues to be heard and ensuring that there are clear and consistent policies on tenants' rights and obligations.

This report provides a number of updates on this ongoing transition including the findings from the Greater Sudbury Housing Survey and Town Hall Meetings ('Coffee Chats') held this past February by the Northern Leadership Program Peer Group.

The report also provides an update on the community partnerships that staff have been working on as part of a population health strategy to bring additional programming to tenants within our housing facilities.

This report also seeks Council approval of the Tenant Complaint Process which was developed following recommendations from the Town Hall meetings and surveys. The Tenant Complaint Process outlines a safe and respectful course of action to deal with complaints in a timely manner.

## **BACKGROUND**

In September 2018, the transition of the Greater Sudbury Housing Corporation (GSHC) to a quasi-independent operating model was approved. This model transferred the administrative component of the corporation to the municipality while leaving the assets within the GSHC. Greater Sudbury Housing Operations (GSHO) is the newest division in the Community Development Department.

## **DETAILS**

### **1. Tenant Engagement**

Tenant engagement is a key process in providing opportunities to create trust between landlord and tenants. The City recognized the importance of this and initiated a project through the Northern Leadership Program, to have a peer leadership group assist in establishing new relationships with Sudbury Housing properties.

During the month of February, a Peer Leadership Group from the Northern Leadership Program, staff from Greater Sudbury Development Corporation (GSDC) and Greater Sudbury Police Services (GSPS) conducted town hall style meetings (Coffee Chats) with tenants and tenant lead groups in order to engage residents concerning matters that were important to them and to improve the quality of life and place and move markers on the City's Housing Population Health Priority. As part of the strategy for this tenant engagement, a survey was developed and distributed during the Coffee Chats, with additional hard copies made available at properties. A link to an online version of the survey was also available on the Housing and City's websites for approximately six (6) weeks.

The objectives of this tenant engagement were:

- To improve services, programs and other initiatives that will enhance the quality of life and place for tenants;
- To determine the needs of tenants in order for them to maintain a successful landlord and tenant relationship;
- To listen to feedback provided by tenants to improve communication between tenants and landlord; and
- Develop an open and transparent Tenant Complaint Process for tenants living within Greater Sudbury Housing Corporation properties.

The key areas of concern identified by Tenants were:

- safety and security
- health and well being
- property maintenance and beautification
- communication and tenant engagement

Appendix A is a summary report prepared by the Northern Leadership Program outlining the survey results, resident concerns and requests for possible changes to service levels and programs.

## **2. Community Partnership Opportunities**

In the context of the City's commitment to population health priorities and interest in building and strengthening neighbourhoods in GSH complexes, a number of community partnership opportunities have been explored. Highlights of the new partnerships which will be piloted or implemented in the summer and fall of 2019 include:

- The Community Garden at 1920 Paris Street received a donation from Coopers Equipment Rental in the form of volunteer labour and equipment to till the existing garden area and spread new topsoil in preparation for the planting season. Housing operations staff assisted with the tilling of the garden area at 720 Bruce Street and installation of a new garden shed.
- Our Children Our Future (OCOF) will be partnering with Housing Operations to offer a free after-school program in the Multi-use Centre at 1960 Paris beginning this Fall.
- Laurentian University Cool Kids Program which is an anti-bullying and sports activity program that has been developed for use by local schools will be operating a free pilot project one night per week in the Multi-Use Centre at 1960 Paris throughout the summer.
- Potential partnership with Cambrian College Physical Fitness Management Program to offer exercise programs in the common rooms of various properties allowing Cambrian Students to complete the mandatory volunteer hour element of their program.

- Pilot project with Local Health Integration Network (LHIN) and Canadian Mental Health Association for a transitional community support worker based at 720 Bruce Street and whose focus is to support tenants and assist with maintaining positive tenancies.
- Partnership with the NE LHIN, March of Dimes and Coulson Court Non Profit Housing on a Neighbourhood Model of support services for Capreol residents.
- Partnership with Better Beginnings Better Futures (BBBF) to offer Collective Kitchens program at Louis Street and 720 Bruce Ave. A community barbecue was held at Louis Street at the beginning of July including children's activities.
- Participate in monthly Community Safety meetings led by the GSPS, Social Planning Council and Noah Community Hub. These regular monthly meetings with tenants and tenant led groups at various housing properties have resulted in increased communication regarding housing and safety matters.

These are only a few of the opportunities that staff are working on to bring activities and wellness programs to housing residents free of charge and demonstrate our commitment to population health priorities. Staff will continue to evaluate and respond to future partnership opportunities that arise.

### **3. Tenant Complaint Process**

As a reflection of the City of Greater Sudbury's vision, mission and core values, Greater Sudbury Housing Operations is committed to assisting tenants in a manner that reflects the City's customer service strategy and meets tenant expectations to deal with complaints in a respectful, safe and confidential manner. This process provides tenants with a clear path to make their concerns known.

Greater Sudbury Housing Operations will ensure that complaints and concerns are investigated and responded to effectively and appropriately. A complaint made will not result in retaliation towards the tenant or barriers to assistance, programs and services provided while living within any of the properties owned by the Greater Sudbury Housing Corporation. All employees and volunteers are responsible to adhere to this process and are committed to address all complaints in an effective and timely manner.

A copy of the Tenant Complaint Process is attached as Appendix B for review and approval. The purpose of the Tenant Complaint Process is to:

- Outline the response guidelines for all verbal and written complaints or concerns received by Greater Sudbury Housing Operations while ensuring the process reflects the City's new customer service response standards, and
- Provide a transparent process for reporting and handling of complaints from tenants, staff and volunteers.

If the tenant complaint is related to a decision as a result of the application of legislation contained in the Housing Services Act, 2011, (i.e. eligibility, unit size or the rent calculation) this tenant complaint process does not apply. It would be subject to a separate internal review process under the rules and timelines outlined in legislation.

#### **4. Tenant Rights and Obligations**

Part of creating a safe and welcoming neighbourhood is ensuring that all tenants are able to experience the quiet enjoyment of their homes. As such, all tenants have an obligation to abide by the terms and conditions outlined in their tenancy agreement. This includes adhering to applicable housing legislation, rules, regulations and City by-laws.

As landlord, GSH has an obligation to ensure that those do not abide by these standards, are dealt with in a clear, fair and consistent manner. Over the next few months, Housing Operations will develop a draft policy, for Council's consideration and approval during the last quarter of 2019. This policy development will include an opportunity for tenants to comment as well as a survey of best practices in other Ontario housing corporations.

In the interim, staff will utilize the process outlined below:

If the Housing Corporation receives a complaint that a tenant has failed to comply with the terms and conditions of their lease agreement, housing policies or City by-laws, the following steps are undertaken to review the situation and determine the appropriate course of action:

Step 1 - Validation of the Complaint: The process to validate a complaint may include; obtaining corroborating statements from other witnesses, review of photographic or video surveillance footage, obtaining reports from police, security or by-law personnel or gathering other relevant information.

Step 2 - Issue a warning letter; a warning letter is issued if this is a first offence and the nature of the breach has determined that it is easily correctable by the tenant.

Step 3 - Issue the applicable Landlord and Tenant Board Notice; The most common notice filed based on tenant complaints is called an N5 Notice to End your Tenancy for Interfering with Others, Damage or Overcrowding. This notice allows the tenant 7 days to stop the activity and correct the breach or 21 days to elect to move out. If the tenant complies and there are no further issues the process ends. The notice is on file and in effect for 6 months.

Step 4 – If there is a similar or repeat occurrence of the breach of the Tenancy Agreement that was identified in the first N5, then the Landlord issues the tenant a 2<sup>nd</sup> N5 Notice and files an L2 Application to End the Tenancy with the Landlord and Tenant Board.

At the Landlord and Tenant Board there is an opportunity to mediate the situation. If a mediated agreement is reached the result is a minimum of 12 months with no reoccurrences. If mediation is not successful or agreed upon by both parties then the matter proceeds to a hearing.

At the Landlord and Tenant Board hearing the evidence is provided to an adjudicator in the form of documentation, or testimony by staff, witnesses or officers. Subsequent to Landlord and Tenant Board hearing, the adjudicator delivers a decision in writing on the termination of the tenancy. The length of time it takes to receive the order may vary depending on the adjudicator's opinion of the severity of the situation.

The Landlord and Tenant Board does not require a letter to be sent prior to serving the first notice however, this practice displays to the Landlord and Tenant Board that Housing has provided an additional opportunity to correct the issues and therefore the practice of sending warning letters, helps fulfill the Housing Corporation's duty to accommodate and work with vulnerable tenants.

There are a number of different Landlord and Tenant Board forms and applications available to both Landlords and Tenants. More information on Landlord and Tenant Board forms can be found at <http://www.sjto.gov.on.ca/ltb/forms>.

## **CONCLUSION**

Housing Operations staff has been focused on initiatives to improve the quality of life and place for tenants, which has resulted in positive changes and improvements over the past nine months. Staff will continue with these efforts to foster positive relationships with tenants and increase the number of partnership initiatives and opportunities.

The next steps in this process include:

1. Communication of the approved Tenant Complaint Process to all tenants of Greater Sudbury Housing Corporation;
2. Further engagement with residents, through surveys, coffee chats and community safety meetings with tenants, tenant lead groups and other Community Partners; and
3. Working with Community Partners to bring forth findings from coffee chats, surveys and other programs and initiatives to the Population Health, Safety & Well-Being Panel to assist with outcomes.
4. Development of a policy with respect to Housing procedures to be followed in serving Landlord and Tenant Board notices, including consultation with tenants at our monthly safety meetings. This policy will be prepared for Council consideration during the fourth quarter of 2019.





# Your Home, Your Voice, Your Say

## Building a Healthy and Happy Neighbourhood



*« Don't look for a better place to live...  
Make where you live  
a better place to  
live for all »*



NORTHERN  
LEADERSHIP  PROGRAM



# INTRODUCTION

For the purpose of this document **Tenant Engagement** is the process by which tenants become involved in the activities and influence the decisions that affect their quality of life and place at Greater Sudbury Housing Corporation properties. Tenant engagement includes preparing and equipping tenants and staff to participate, and involving tenants in monitoring and evaluating the quality of their participation. A key element to maintaining a healthy and sustainable housing portfolio and effective housing management is **Tenant Engagement**. Tenants deserve the opportunity to have their voices heard in order to live happily and healthily within their homes and neighbourhoods.



Coffee Talks allowed tenants within the GSHC to speak openly in a safe setting within their neighbourhood. Each participant was able to address his/her concerns while living in GSHC properties. There was also an opportunity for those who were not able to participate in Coffee Chats that were not comfortable speaking out loud, to share their thoughts through a survey that was made available on site in multi-purpose areas or through an online survey via the City's and GSHC's websites.

Through transparency within this tenant engagement process, the NLP team assigned to this project ensured that all tenant voices were heard in an unbiased manner. Coffee Chats allowed tenants to provide positive input into future decisions that may impact their safety, security and well-being within their homes. They were also empowered to improve the communities in which they live through this tenant engagement process.

## DESIRED OUTCOMES FOR TENANT ENGAGEMENT

- Successful Tenancy / Improved Occupancy Rates
- Resilient, Healthy, Happy Tenants
- Enhanced and Improved Tenant Relations
- Experience of Equity, Respect and Compassion
- Efficient Program and Service Provision and Delivery
- Improved Integration of Community and Health Services on Housing Properties

# MAIN TENANT CONCERNS

1. Safety and Security
2. Health and Well-Being
3. Property Maintenance and Beautification
4. Communication and Tenant Engagement

*« There is a positive attitude towards changing community now. Love where they live as there are really good people that live there. They are good to each other. »*





## 1. SAFETY AND SECURITY

- Provide 24/7 hour security in buildings. If not feasible, change hours where security is provided during evenings and weekends.
- Increased police presence (i.e.) former Zone 30 office or other satellite offices on properties.
- Perform Crime Prevention Through Environmental Design (CPTED) for each property and follow recommendations.
- Create a 'Neighbours on Patrol' similar to what 'Citizens on Patrol' (COPs) does in community but locate in each building to empower residents to work together to improve safety and security . Perhaps GSPS can provide training on this for residents.
- Install cameras in all public areas (i.e.) hallways, stairwells, multipurpose areas, outside, etc.
- Improve the lighting for indoor/outdoor public spaces (i.e.) blue lighting to discourage needle injections and drug use in stairwells.
- Have SACY clean up used syringes outside/inside building on a regular basis.
- Host education sessions on who to call and what to do when needles are found.

## 2. HEALTH AND WELL-BEING

- Provide building safety/fire/evacuation training (i.e.) what to do in case of fire, how to exit building.
- Provide community health services on site in buildings that have common rooms. Ie: walk in clinic, mental health services, community paramedicine programs, home & community care services, one stop shop for employment, social services, hair dressing, dental hygienist, Access Aids, NOAHs Hub, NISA, etc.

### 3. PROPERTY MAINTENANCE AND BEAUTIFICATION

- Improve cleanliness in public areas.
- Beautify building entrances and outdoor spaces so that it is friendly and welcoming.
- Designate specific area(s) for animal's outdoors to eliminate feces/urine from being on walkways, front lawn, etc.
- Install hand sanitizer dispensers (with no alcohol) in building front entrance ways.
- Improve snow removal times.
- Host tenant clean up days as is done in Community where volunteers join together to clean the outside areas of their homes/neighbourhoods.

### 4. COMMUNICATION AND TENANT ENGAGEMENT

- Create a complaint response policy. Set a time limit for response.. Train / educate tenants on appropriate use of complaint forms and processes.
- Complete 'Move In' Checklists.
- Concern regarding GHSHO staff burn out. Recognize the high stress levels for staff and address internally by adding additional staff or providing systems to assist with mental health and well-being.

Locate GHSHO staff on site to handle tenant inquiries / complaints in large buildings or where common space is available. If not feasible, assign various staff to buildings during designated regular times.

- Hire Tenant Relations staff to bring community services to buildings. Tenants also need assistance in completing paperwork/forms.
- Host orientation sessions for new tenants in building, complaint / maintenance systems, etc.
- Develop a welcoming package for new tenants.
- Provide mediation support to tenants.
- Host regular coffee chats within buildings.
- Provide education on how systems work with CGS, GSPS and GHSHO.

## APPENDIX A — TENANT COFFEE TALK SCHEDULE

Target	Location	No. of Attendees	Date	Time
1960 B Paris Street	1960 C Paris Street Multi-Use Centre	4	February 6, 2019	10:00 a.m.
1960 A Paris Street	1960 A Paris Street - Common Room	16	February 6, 2019	1:00 p.m.
1920 Paris Streets	1920 Paris Street - First Floor Common Room	22	February 6, 2019	5:00 p.m.
720 Bruce Street 744 Bruce Street	720 Bruce Common Room	15	February 14, 2019	1:00 p.m.
1778 LaSalle Blvd 1950 LaSalle Blvd	Lansing Baptist Church - 1950 LaSalle Blvd	One volunteer showed up. Flyers did not get delivered therefore had to reschedule session to February 26 <sup>th</sup> .	February 14, 2019	10:00 a.m.
Louis Street Properties	166 Louis Street Common Room	11	February 26, 2019	10:00 a.m.
1200 Attlee Street Properties	New Sudbury Public Library Board Room 1346 LaSalle Blvd.	0	February 20, 2019	9:30 a.m.
241 Second Avenue 491 Camelot Avenue	Morel Park – 270 Second Avenue	4	February 20, 2019	12:30 p.m.
1778 LaSalle Blvd 1950 LaSalle Blvd	Lansing Baptist Church Hall 1950 LaSalle Blvd	4 on line — 1 in person	February 26, 2019	12:30 p.m.

# Demographics

What is your preferred language?

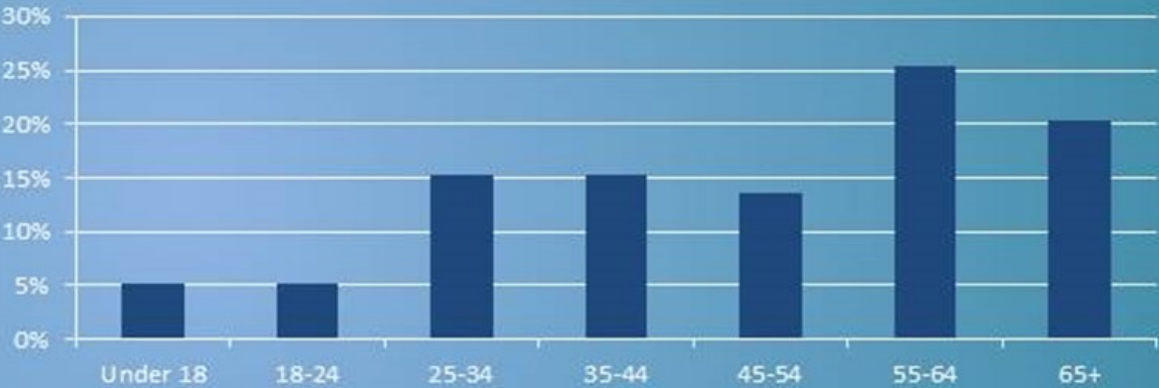
English French Bilingual



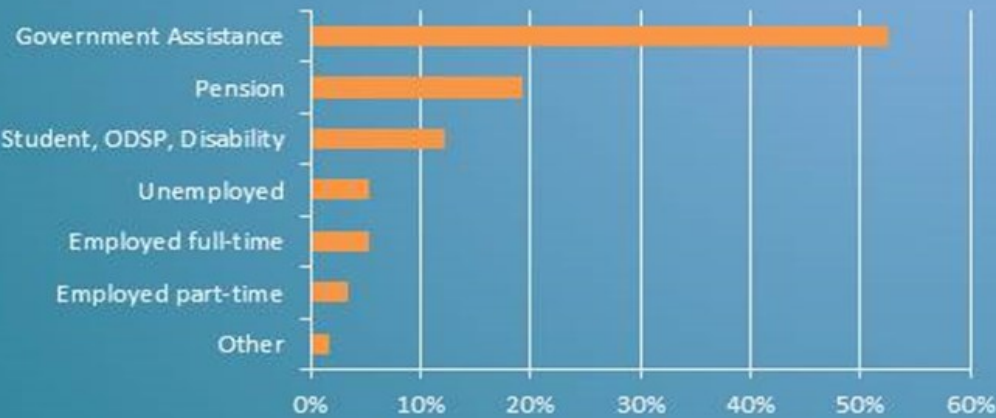
63 Total Survey Respondents



What is your age?



What is your current employment status?



What is your marital status?



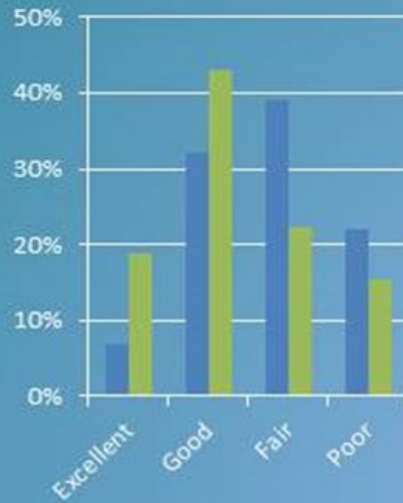


# Health



How would you rate your overall physical health?

How would you rate your overall mental health/emotional well-being?



Do you feel health care services are easily accessible?

Yes No No opinion



Do you have a family physician or a nurse practitioner?

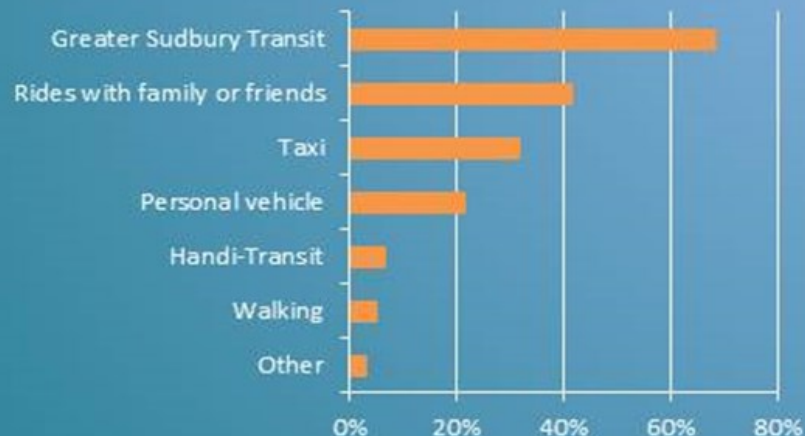
Yes No



# Transportation



Which methods of transportation do you use?  
Check all that apply.

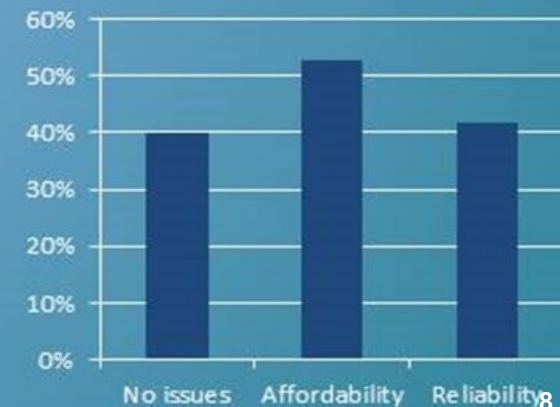


On average, how many times a week do you leave your home for any reason?

Daily 1 to 3 times per week Less than once a week Rarely



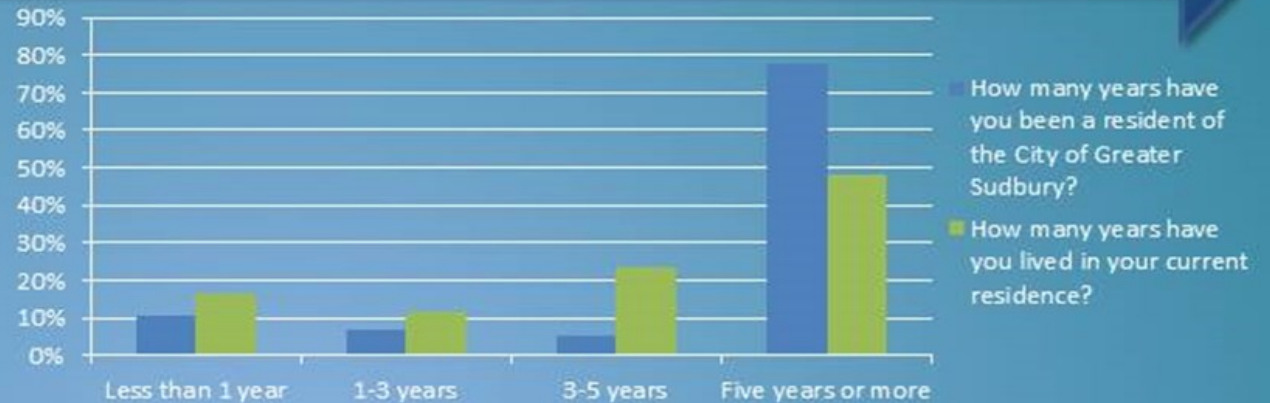
Are affordability or reliability of your methods of transportation an issue? Check all that apply.



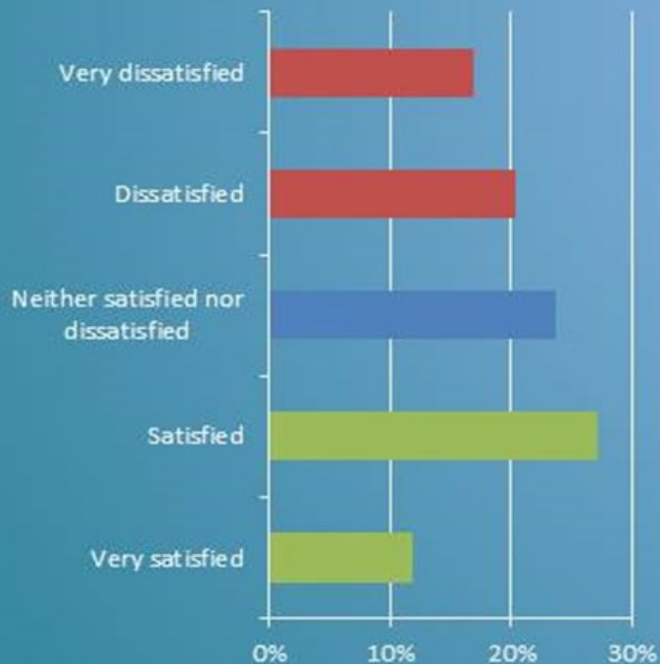
# Residence

Please select your current residence:

1920 Paris St.	34%
1960A Paris St.	17%
1950 LaSalle Blvd	16%
166 Louis St.	12%
720 Bruce St.	10%
1960B Paris St.	7%
241 Second Ave.	3%



How satisfied are you with your residence?



Are there enough events and activities available to you in your residence?



How many dependents currently reside in your home?

None (Blue), One (Red), Two (Green), Three or more (Purple)

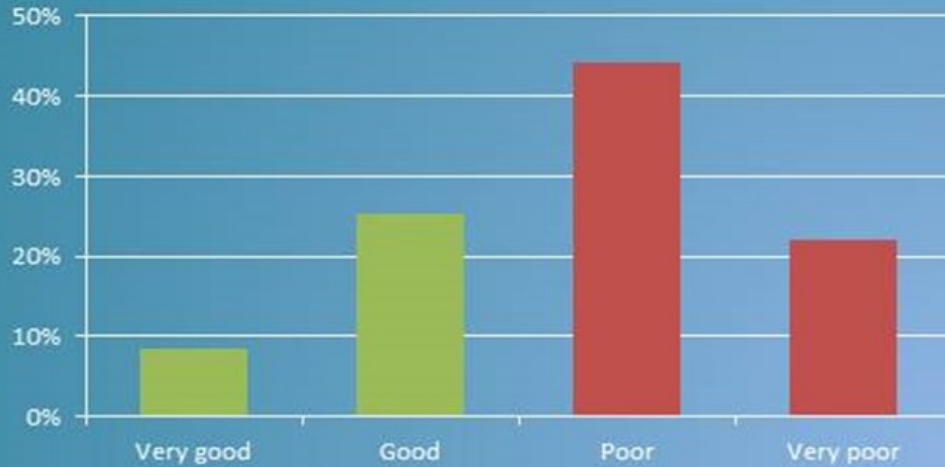




# Security



How would you rate the safety and security of your residence?



Are you currently a volunteer either inside or outside your residence?

■ Yes ■ No

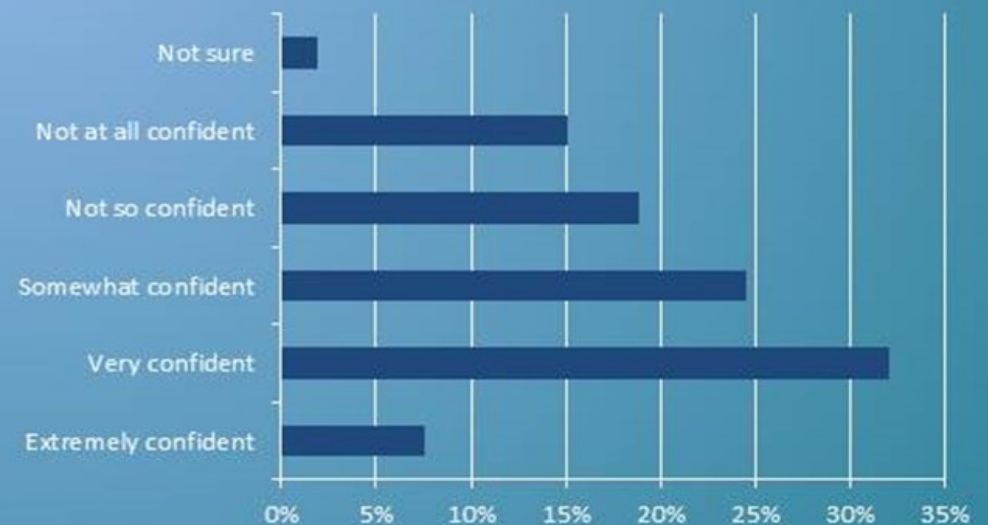


Do you want to remain in your current residence?

■ Yes ■ No ■ Not sure



How confident are you that you will be able to live in your current residence for as long as you like?



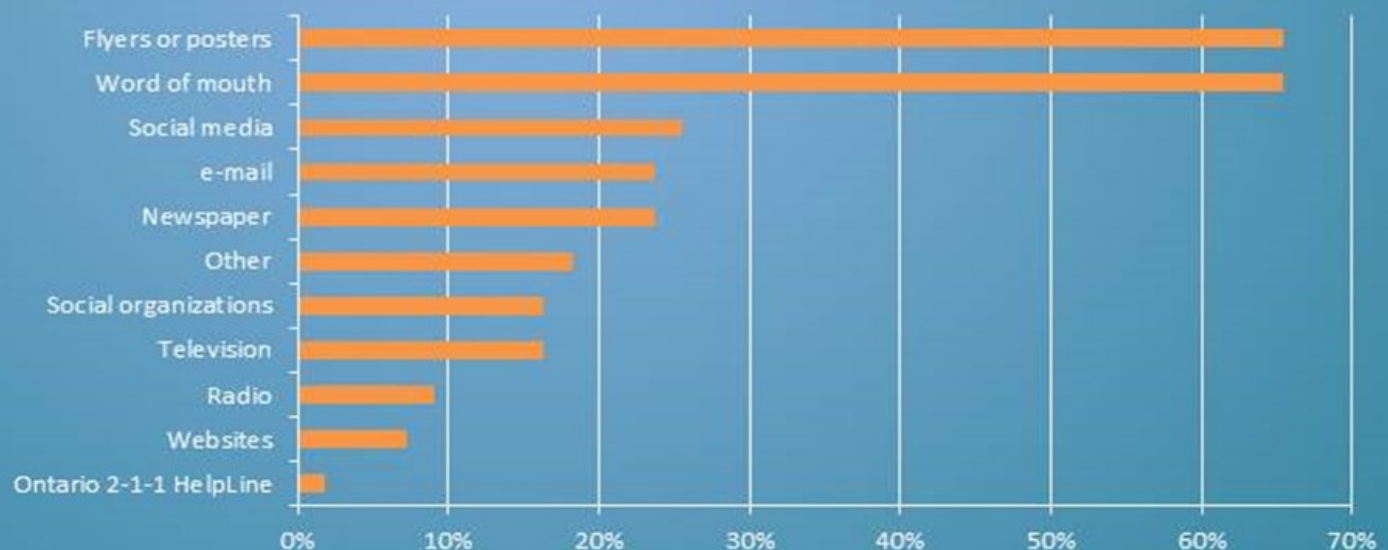
# Communication

What is your preferred method of communication with the City of Greater Sudbury's Housing Operations (formerly GSHC)?

- In person
- By phone
- By e-mail
- By postal mail
- Other
- Posters or flyers



How do you receive information about community events or programs? Check all that apply.





## Tenant Complaint Process

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The Greater Sudbury Housing Operations (GSHO) expects that in the normal course of its interactions with its tenants there will be occasions when tenants are dissatisfied with the service they have received or with decisions made by GSHO. For the most part, such issues are expected to be resolved with Housing Operations front-line staff.

This Tenant Complaint Process is intended to deal with complaints that are made in good faith and that are not resolved after initial attempts between the Complainant(s) and GSHO staff.

This process is intended to benefit tenants and GSHO as a whole. Dealing with complaints through this process will help minimize instances of dissatisfaction and provide valuable guidance in improving procedures and, consequently, the tenants' experiences with GSHO.

This Tenant Complaint Process does not replace the Internal Review Process which allows for tenants to appeal decisions made with respect to the application of legislation such as eligibility for housing, unit size, status on waitlist or calculation of rent. The timelines and process for appeal of those types of decisions is outlined in the Housing Services Act, 2011.

### **Purpose of the Tenant Complaint Process**

The purpose of this Process is as follows:

- To provide tenants and GSHO staff with a clear understanding as to how a complaint will be addressed where initial attempts to resolve the dispute have not been successful and;
- To ensure that GSHO deals with complaints as an opportunity to address issues and improve its ongoing relationship with, and service to, its tenants.

### **Application of the Tenant Complaint Process**

This process applies to all tenants of Greater Sudbury Housing Corporation.

### **What is a "Complaint"?**

A "Complaint" is an expression of dissatisfaction with a policy, decision, or procedure offered or made by GSHO. The Tenant Complaint Process is initiated by a complaint which may be made in writing, over the phone, or in person, as set out below.

Examples of a complaint may relate to a perceived failure of the organization to do something that it has agreed to do, an error, unprofessional behaviour of staff, or a failure of GSHO to observe its own policies.

Because this process is intended to be used after initial attempts to resolve a matter have proved unsuccessful, a Complainant will be asked to confirm that:

- They have taken positive steps to resolve the issue on their own and that these actions have been unsuccessful; and/or
- They are not able to do so for reasons beyond their control and therefore require assistance from the GSHO.

Note: The Complainant should be able to explain what happened, who was involved, who took what actions, and include dates and times.

#### Complaint Example:

A tenant who requires a repair to his or her unit must first request maintenance through the established processes with GSHO. The tenant may make a complaint under the Tenant Complaint Process in the event there is no response to the tenant's request in a timely manner, or where the tenant feels the response is unsatisfactory.

### **How to Make/File a Complaint**

A Complainant may make a complaint in a variety of ways including, but not limited to:

- Paper form (submitted in person at the GSHO central office or sent by fax or mail), with forms available from GSHO;
- Internet portal submissions on Sudbury Housing website and/or email submission to GSHO;
- Intake interview procedure, with a staff member, which may be by phone or in person;
- Intake voice message system, to the office, whereby a Complainant may leave the necessary information (in this case, a staff member will contact the Complainant to obtain any missing information and formalize the complaint); or
- Other intake methods as may be determined by GSHO.

Greater Sudbury Housing Operations recognizes that some complainants may require special assistance in bringing their complaints forward. Forms can be made available in different languages and will be compliant with the Accessibility for Ontarians with Disabilities Act, 2005. And, where necessary, GSHO shall ensure that a tenant who cannot read, write or speak English receives the assistance required to file a complaint.

The following information may be collected:

- Name of the complainant;
- Address of the complainant;
- Additional contact information for the complainant (phone number, email address);
- Description of the incident or reason for the complaint, including information such as the names of all parties involved, when and where the incident occurred, and what was said or done/not done;
- Steps taken to address the incident, or an explanation of why no steps were taken; and
- What kind of resolution is being sought by the complainant.

Such information will be strictly confidential and used only to assist a complainant in resolving the complaint.

Complaints relating to personnel are kept separate and apart from tenant or employment files, as the case may be.

### **Initial Response/Acknowledgement of Receipt**

In accordance with the City's customer service standards, within two (2) business days of receiving a formal complaint, GSHO shall provide the complainant with a response confirming receipt of the complaint.

### **Response/Interim Response**

An interim response will be prepared within ten (10) business days and the final response should be completed within fifteen (15) business days. If there are delays in meeting these timelines, the reasons for the delay should be communicated to the complainant.

This interim response will explain how the complaint will be addressed, including:

- The name of GSHO representative responsible for handling the complaint;
- When the complainant can expect to be contacted;
- The expected timeline for resolving the complaint; and
- How the complaint and its resolution will be communicated.

Staff involved will be notified of the complaint and will have the opportunity to address the complainant's concerns. If the complaint relates to that particular staff member, the complaint will be handled by the Senior Department Manager.

### **Who to Contact about your Complaint – Decision Makers – Four Stage Escalation Process**

Every effort should be made to resolve complaints at the "front-lines" without resorting to the internal tenant complaint process. In general, GSHO uses a four (4) stage escalation process to handle and review a complaint.

1. GSHO Front-line Staff
2. GSHO Front-line Managers
3. GSHO Department Senior Managers
4. CGS Director of Housing Operations

Note: Where all steps of the four stage escalation process have been utilized and proven unsuccessful, GSHO shall advise the complainant that it has further recourse to the CGS Service Manager. Please also see the 'Further Recourse' section in this document.

### **How a Decision is Made**

1. Front Line Staff and Managers Review (Informal)

GSHO front-line staff receiving a verbal complaint may attempt to solve it immediately and informally without the need for a tenant to proceed to submit a formal Complaint Form.



Where a complaint is resolved informally, GSHO is not required to provide a written response to the complainant.

When a complainant requests a formal review of the complaint, or where the complaint relates to a specific staff person, or where the complaint involves an allegation of criminal activity, the complaint shall be referred to a GSHO Senior Manager of that Department for review.

## 2. Senior Staff Review

When the informal complaint process has not been successful, and a formal written complaint is received, it shall be referred to the relevant GSHO Senior Manager, who may attempt to resolve the matter immediately, or initiate a formal review. In either case, the Senior Manager will advise the complainant of his or her decision.

Where a complaint is resolved immediately by the Senior Manager, the Senior Manager shall make note of the resolution and insert the same into the relevant file. In such a circumstance, a written response to the complainant is not required.

Where a complaint is not resolved by the Senior Manager within fifteen (15) business days of the commencement of the Staff Review, the complainant may submit the complaint for Formal Review. In the event the complaint is related to the actions of the relevant Senior Manager, the Staff Review shall be carried out by the CGS Director of Housing Operations.

## 3. Formal Review

If the complaint cannot be resolved by the Senior Department Manager, a formal review will be initiated. A formal review may be carried out by a GSHO Senior Manager who is not directly involved in the process or procedures giving rise to the complaint or the CGS Director of Housing Operations.

A formal review may include (without limitation) discussions with the complainant, discussions with staff involved, review of any relevant information, and obtaining third party evidence or expert advice.

The complainant will be advised in writing of the results of the formal review and, if the complaint is found to have been justified, the corrective action to be taken by GSHO. If the complaint is found not to have been justified, the complainant shall be so notified in writing with the reasons for such finding and any options for further recourse.

### Potential Outcomes

By their very nature, all complaints will be different and may require different solutions. Without limiting the potential ways in which GSHO and complainants, working together, may be able to resolve a complaint, potential resolutions include:

- An apology;
- A change to operating procedures;
- Reimbursement of funds;
- Third party mediation;
- A referral to other forms of redress; and/or

- No action required

**Further Recourse**

Recognizing that not all complaints will be resolved in a manner satisfactory to the complainant, where GSHO makes a decision that a complaint is not justified, and where all steps of the four (4) stage Escalation Process have been utilized and proven unsuccessful, GSHO shall advise the complainant that it has further recourse to the CGS Service Manager, GM of Community Development or, in appropriate circumstances, to other legislative processes such as making a complaint to the Landlord and Tenant Board or the Ontario Human Rights Commission. To the extent a statutory framework exists governing the resolution of a complaint, the complainant may pursue remedies through such framework.