

Comments for Deputation of BILL 184

“Protecting Tenants, Strengthening Community Housing Act, 2020”

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SUMMARY

It can be argued that:

Certain parts of the proposed legislation may be interpreted as a form of “societal mobbing,” aimed at eroding vulnerable citizens, through the use of loopholes, unfair and unethical practices, and, disguised in the form of the Landlord & Tenant Board, operated by non-elected individuals, yet also part of a provincial governance of elected individuals. (Ontario Civil Liberties Act)

And,

There is no safe-guard, policing, standard practices, enforcement for ensuring that Landlords have correct consent of tenants’ personal information, resulting in too much risk of personal information which could be given to “third parties.” An occurrence, where tenants’ personal information was used to harass, has already come up at the “Office of the Privacy Commissioner” in the past. It serves to reflect on the intent and integrity of some of the proposed legislation in BILL 184, since it borders on the inappropriate disclosure of citizens’ privacy. (see PIPEDA Case Summary #2009-017)

And,

Given there is a pandemic, the provincial government, in the name of Rob Ford, is gouging the public.

SPECIFIC POINTS:

1. *Advance notice if tenants intend to raise their own issues, ie. poor maintenance* – this is a procedural burden which causes a disadvantage over several factors; language, financial, ability, disability, etc.
2. *Legally enforceable repayment agreements to be made outside of the LTB*- if the situation is taken outside of the Landlord & Tenant Board, it would be contravening the reason a Landlord & Tenant Board was established.
3. Allowing landlords to pursue tenants for rent & utilities arrears through the LTB, instead of small claims court – will cause the LTB to become a debt collection agency. The Landlord & Tenant Board needs not act like a debt collection agency, for several reasons, not the least of which is that housing is a basic human need, and, a collection agency would harass people, and would likely breach civil liberties, and privacy.