



POLICY PAPER

Housing, Transit, & Community Development

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ABOUT OUSA

OUSA represents the interests of 150,000 professional and undergraduate, full-time and part-time university students at eight student associations across Ontario. Our vision is for an accessible, affordable, accountable, and high quality post-secondary education in Ontario. To achieve this vision we've come together to develop solutions to challenges facing higher education, build broad consensus for our policy options, and lobby government to implement them.

The member institutions and home office of the Ontario Undergraduate Student Alliance operate on the ancestral and traditional territories of the Attawandaron (Neutral), Haudenosaunee, Huron-Wendat, Leni-Lunaape, Anishnawbek, and Mississauga peoples.

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OUSA policy papers are written by students to articulate student concerns and offer student-driven solutions for accessible, affordable, accountable, and high quality post-secondary education in the province.

To support our policies and ensure that we are effectively representing undergraduate and professional students at Ontario's universities, students and student groups from each of our eight member institutions were consulted to provide guidance and feedback on the principles, concerns, and recommendations contained herein.

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EXECUTIVE SUMMARY

Students are important members of their municipalities, facing many of the same concerns that their neighbours face in terms of housing, transit, and community development. However, students also face unique challenges and barriers to living safely and comfortably in their communities. Access to quality and affordable housing, a lack of education and information about rental housing and tenant rights, and gaps in provincial legislation and dispute resolution pathways raise concerns for students about rental housing. These issues are compounded by barriers to accessible transit and discriminatory bylaw enforcement that leaves students unfairly targeted and hinders their ability to feel a sense of belonging and build positive relationships with their communities. Provincial support is needed to ensure municipalities are able to meet the needs of all residents, including students, and to foster strong, positive relationships between universities and their municipalities.

THE PROBLEM

Poor Quality and Unaffordable Student Housing

Housing in predominantly student areas near campus often have some issues, including poor quality, physical safety, structural soundness, and lack of usable dwelling facilities. Yet, the only way that tenants can hold their landlords accountable for the quality of housing and municipal property standards is retroactively through the Landlord Tenant Board or the Rental Housing Enforcement Unit, which can be ineffective to ensure students' ability to live in quality housing.

Student housing can also be unaffordable for many, as near-campus housing and housing in predominantly student areas can have high rental rates for their value and the cost of living in their respective city. Corporate-owned student housing and landlords with multiple properties can exploit their market power, which can diminish the power of students and often leaves students not paying fair market value for their accommodations

Gaps in Information and Education for Tenants

Many student associations as well as institutions lack the necessary resources to provide adequate education to students about tenant rights and responsibilities, and the provincial government does not make an adequate effort to provide this information to student renters in their respective cities. Further, legal aid clinics across Ontario are overworked and underfunded which limits their ability to provide essential legal services to all those that require it and student associations and post-secondary institutions do not have the necessary resources to support students with legal issues.

Although the creation of the Standardized Lease Agreement is designed to protect tenants by regulating against the inclusion of illegal clauses, student tenants are still frequently taken advantage of by landlords because information about their rights and responsibilities is not clearly advertised. Student tenants, especially international and non-official language speaking students, are vulnerable to predatory leasing practices.

Gaps in Landlord Accountability

High-occupancy tenancies are often neglected by landlords and property managers, and prospective tenants cannot make informed decisions because information regarding landlords' history with the Landlord and Tenant Board is not easily accessible.

Gaps in Provincial Housing Legislation

Students report that landlords act in violation of the *Residential Tenancies Act* within their rental agreements, including but not limited to: withholding repairs and maintenance, attempting to enter a rental unit without cause or proper notice, and/or requesting confidential information from tenants. Additionally, some landlords do not honour agreements made in their leases with tenants, including rental units not being ready on contractually agreed upon move-in dates, without offering pro-rated rent.

Yet, legislated protections have been inadequate as the *Residential Tenancies Act* does not fully account for the unequal bargaining power between landlords and tenants and there are few pre-occupancy protections for tenants under provincial law.

Limitations in Dispute Resolution Pathways

Seeking recourse and restitution through the Landlord and Tenant Board or the Rental Housing Enforcement Unit can be confusing and time-consuming processes for student tenants due to the complexity of the process and the lack of information students have. Additionally, students are deterred from filing claims with the Landlord and Tenant Board because of the fees associated with the application. Students are further deterred from dispute resolution processes due to the disconnect between the Landlord and Tenant Board and the Rental Housing Enforcement and the fact that if a landlord does not comply with a decision made by the Landlord and Tenant Board, student tenants have to seek enforcement through the courts, which is prohibitively expensive and time-consuming.

Limited Inter-Regional Transit Options

Students are concerned about the lack of transit routes connecting different municipalities, that the routes that do exist often lack coordination and interconnectivity, and that there are limited direct transportation options for students wishing to travel between regional or international airports and university campuses. They are concerned because the inability to easily move between municipalities can negatively impact a student's experience while studying and/or living in a municipality outside of their permanent residency and because municipalities with few inter-regional transit options limit students' access to affordable means of travel.

Further, abolition of the *Public Vehicles Act* does not make clear what the future of bus company licensing in Ontario will resemble, creating uncertainty for students about market failure through destructive competition, leading to less cross-subsidization of unprofitable routes by public transit providers affecting students on those routes.

Lack of Student Representation

Students are concerned about not having formal representation on any provincial transit boards, including Metrolinx and Ontario Northland, particularly because students are not routinely consulted on provincial transit issues or developments.

Local Transit Challenges

Students are also concerned about local transit issues, both disruptions and access to transit, particularly in northern areas, which create significant barriers for students to access their university campuses and other community resources. Northern communities generally lack sufficient funds and resources to manage a transportation system and have smaller populations and insufficient ridership to justify a transportation system. Further, some municipalities are insufficiently resourced to deliver rapid, reliable, and safe public transit options. This is compounded by the fact that the "heads and beds" levy paid by the province to municipalities has remained stagnant for over three decades.

Barriers to Active Transit

Lack of active transit infrastructure is another concern for students as it decreases student mobility, creating barriers for students trying to access their schools, jobs, and other facilities within the community, particularly transit hubs which are difficult to access by alternative modes of transit other than by car. However, municipalities do not always have the financial capability to invest in active transit infrastructure as they are legally required to run balanced budgets per the *Municipal Act*, preventing them from running deficits and eliminating an important tool for financing infrastructure projects

Inaccessible Transit Options

Students are concerned about the physical and financial barriers to local and inter-regional transit for students with mobility concerns, audio/visual impairments, and other related disabilities. Although some post-secondary institutions have transit deals in place to alleviate the cost of transportation, local and inter-regional transit costs can remain prohibitively expensive for many students.

Discriminatory Bylaw Enforcement

Students' ability to enjoy their community is challenged by discriminatory bylaw enforcement, particularly as students face targeted bylaw regulation that other community members do not.

Ineffective Planning for Near-campus Neighbourhoods

Students are concerned about near-campus neighbourhood planning; particularly that the Ministry of Municipal Affairs and Housing's Provincial Policy Statement does not address near-campus neighbourhood development, increasing and improving green spaces, or mixed-use zoning, and that the supply of housing does not increase at the same rate as populations in student communities, creating a lack of housing density.

Barriers to Safety

Students have a number of concerns about their safety and belonging in their communities, citing a lack of engagement from their municipalities. Notably, students are not always aware of when and what personal information is being shared outside of their post-secondary institution. The crime rates in near-campus neighbourhoods has been increasing in recent years and evidence-informed strategies are not always used in community development and crime prevention.

RECOMMENDATIONS

Ensuring Quality and Affordable Student Housing

Top support students in accessing quality and affordable housing, the Ministry of Municipal Affairs and Housing should implement a standardized process that would require all landlords to register for an annual license of any rental property. Additionally, the provincial government should work with the Association of Municipalities of Ontario to establish an advisory committee on student housing issues to identify concerns and develop solutions to issues related to quality and affordability. They should also develop standardized rental increase communication guidelines that require notices for rent increases to include the original rent amount, the approved provincial increase, the new rental rate, and the period of time a tenant has to make an application to the Landlord Tenant Board should they be concerned about the validity of the increase.

Disseminating Information and Education for Tenants

The provincial government should work with Legal Aid Ontario, municipalities, university administrators, as well as student associations to adequately fund the promotion and reinforcement of tenant rights and responsibilities, with an emphasis on reaching international and non-official language speaking students. This should be supported by a reinvestment in provincial legal aid, earmarking funding to support student access to legal services and grant funding, available to on campus and community legal services or other student-serving groups, to establish access to free legal services for students.

Rental Licensing

To support greater landlord accountability, the Ministry of Municipal Affairs and Housing should mandate municipalities to create more stringent rental bylaw processes with an emphasis on high-occupancy tenancies, as well as establish a free, province-wide, public database of landlords to ensure quality and transparency between landlords and tenants.

Amending Provincial Legislation

The Ministry of Municipal Affairs and Housing should review the *Residential Tenancies Act* and consult with student and tenant rights advocacy groups to identify and eliminate gaps in pre-tenancy rights. The provincial government should amend the *Residential Tenancies Act* to: require that, in the case that extensive construction on a rental unit is not complete on a contractually binding move-in day, tenants are returned their deposit and rent payments for the period of time they are not occupying the unit, regardless of whether or not the tenant chooses to terminate the lease; protect a tenant's ability to raise the defence at arrears of rent hearings; no longer subject former tenants to hearings at the Board without proper service of legal documents; and prohibit landlords from collecting rental deposits prior to a building obtaining a Final Occupancy Permit.

The provincial government should also amend the *Ontario Human Rights Code* to ensure that the right to be free of discrimination applies to boarders who share bathroom and kitchen facilities with their landlord or their immediate family.

Improving Dispute Resolution Pathways

To make dispute resolution more accessible to student tenants, the Ministry of the Attorney General should appoint a sufficient number of adjudicators in order to ensure that claims made to the Landlord and Tenant Board by student tenants and other vulnerable demographics meet the Landlord and Tenant Board Service Standards. After the completion of the Ontario Ombudsman's investigation into the delays of the Landlord and Tenant Board, the Ministry of Municipal Affairs and Housing should consult campus student housing groups and student associations to respond to the findings of the inquiry. Additionally, the Ministry of the Attorney General and the Ministry of Municipal Affairs and Housing should establish a single complaints and claims process by developing a clear and comprehensive plan for the integration of the Landlord and Tenant Board and of the Rental Housing Enforcement Unit. Finally, the provincial government should amend the Fee Waiver eligibility requirements to be inclusive of OSAP-eligible students and students with demonstrated financial need.

Expanding Inter-Regional Transit

To ensure students can access inter-regional transit, the Ministry of Transportation should coordinate with Metrolinx and the Ontario Northland Transportation Commission to develop an environmentally sustainable, long-term, inter-regional transit plan that would take into account post-secondary institutions. Additionally, the provincial government should: reinvest in a high speed rail along the Windsor-Toronto Corridor and the Toronto-Ottawa corridor; establish direct transportation routes connecting post-secondary transit hubs to regional and international airports in the province; and commit to a long-term expansion of provincial contributions to the Metrolinx operating and capital budgets to facilitate long-term labour stability and the ability for Metrolinx to offer transit services to students in areas not economically viable to service through the private sector.

The provincial government should also amend Ontario Regulation 189/09: Go Transit Service Area to expand transit routes throughout the province, ensuring that all students have access to inter-regional transportation services and pause the repeal of the *Public Vehicles Act* and reform the Act to align with the 2016 Intercity Bus Modernization discussion document and the results of consultations with student stakeholders and experts.

Increasing Student Representation

Both Metrolinx and Ontario Northland should strike a permanent advisory committee, comprised of student representatives from each region that is serviced, to advise on transit issues and infrastructure development that affects post-secondary students. They should also adopt one seat for student representation on their boards of directors to address student concerns and opportunities for improved service between university transit hubs and to better connect northern students to their universities.

Improving Local Transit

To address issues with local transit, the Ministry of Colleges and Universities and the Ministry of Transportation should work with student groups to create a template for institutional responses to transit

disruptions, including provisions for students who are affected, such as allowing students to attend classes remotely. Additionally, the Ministry of Transportation should prioritize northern municipalities when distributing funding through the Community Transportation Grant Program.

The provincial government should invest in rapid transit projects in municipalities with post-secondary institutions and adjust the “heads and beds” levy in accordance with inflation to account for the additional wear and tear on local transit infrastructure.

Improving Active Transit

To increase access to active transit options, the provincial government should: expand the Ontario Community Transportation Grant Program and prioritize municipalities with post-secondary institutions and active transportation or ‘Complete Streets’ plans within its eligibility criteria; provide envelope funding to municipalities who wish to implement innovative active transit pilot programs; and should implement First and Last Mile planning in all existing and future transit hub developments to ensure that students can access transit without driving.

Accessible Transit

To improve the accessibility of transit, the Ministry of Community and Social Services should expand the Ontario Disability Support Program to provide reduced-cost inter-regional transit services for persons with disabilities and the Ministry of Transportation should provide funding to Metrolinx, Ontario Northland, and other local transit authorities to offer stronger discounted student pricing.

The Ministry of Transportation should also work with students and others in the disability community to identify and respond to gaps in Part V: Transportation Standards in Ontario Regulation 191/11 of the *Accessibility for Ontarians with Disabilities Act* that fail to address the needs of students with disabilities accessing public transit.

Municipal Bylaws

To support students in their municipalities, the Ministry of Municipal Affairs and Housing should develop accountability measures in consultation with student representatives and the Ontario Human Rights Commission to ensure municipalities do not create by laws that discriminate against students in practice and review the developed accountability measures in consultation with the Ontario Human Rights Commission. Additionally, the Ministry of the Attorney General should issue a statement—for the courts to adhere to—that recognizes student status as a proxy for age, marital status, or recipient of public assistance in order to grant better protection under the *Ontario Human Rights Code*.

Planning for Near-campus Neighbourhoods

The Ministry of Municipal Affairs and Housing should add sections to the Provincial Policy Statement that discuss: the benefits of green spaces within near-campus neighbourhoods; development guidelines, specifically by addressing the merits of mixed-use zoning for near-campus neighbourhoods; and the merits of intensifying housing stock through upzoning if required in near-campus neighbourhoods.

Safer Communities

To ensure students feel safe and included in their communities, the Ministry of Colleges and Universities should mandate that students be made aware of all memorandum of understanding agreements between government services and post-secondary institutions that deal with student information.

Further, the Ministry of the Solicitor General and the Ministry of Municipal Affairs and Housing should develop provincial crime prevention and community safety policies that prioritize the voices of a diverse array of community members so that programs can be adapted based on the needs of those community members and the provincial government should fund development and analysis to assist municipalities in effectively collecting and using data in an ethical and transparent manner to understand local issues.

The provincial government should also provide envelope funding for workshops and conferences between municipalities and universities aimed at developing and improving partnerships, public engagement and student engagement in crime prevention activities, as well as investments in local work-integrated learning opportunities with a focus on community-building and partnerships between the municipality and students.

Further, the Ministry of Colleges and Universities should mandate that each post-secondary institution publicly release a standardized yearly public report indicating all allocations of the Campus Safety Grant, and the provincial government should partner with the United Nations Safe Cities Initiative to collect data and create informed strategies to protect Canadians in their municipalities and work with student associations to create informed strategies to protect students in their municipalities.

INTRODUCTION

Ontario's post-secondary institutions are integral parts of their respective municipalities, and students play an important role in their communities. Collaboration and coordination between universities and their local municipalities is an important aspect of facilitating a mutually beneficial relationship. A healthy, productive environment born out of collaboration and coordination allows both students and municipalities to thrive by fostering an environment of trust, growth, respect, and community. However, students are often overlooked and underappreciated, viewed as disengaged and a population to be controlled and managed through excessive bylaw regulation and monitoring. This view of students makes it difficult to understand the barriers they face to meaningful engagement, secure housing, and accessible transit options. It suggests students cannot be good neighbours and prevents many from achieving a quality of living necessary to succeed in their education and career development.

Yet, in town and gown communities across the province, students face both unique and familiar challenges to their non-student neighbours – housing, transit, and community development are particularly ubiquitous issues that illustrate how students experience their communities in many of the same, and also many different, ways. This policy paper identifies a number of student concerns that impact their ability to live, work, and study safely and comfortably, and to develop positive relationships with their communities. It also offers student-driven recommendations for the provincial government to ensure municipalities are supported and able to meet the needs of all residents, including students, and to foster strong, positive relationships between universities and their municipalities.

It begins by discussing the barriers students face to accessing quality and affordable housing, including a lack of education and information about rental housing and tenant rights, and gaps in provincial legislation and dispute resolution pathways that leave students vulnerable to predatory leasing practices. Students also face barriers to accessing safe and affordable transit, whether it is inter-regional connectivity, local transit, or active transit. Many of these concerns are overlooked due to a lack of student representation on provincial transportation boards, but other concerns stem from infrastructure that falls short of meeting the needs of student ridership. Concerns around housing and transit are compounded by discriminatory bylaw enforcement that leaves students unfairly targeted and hinders their ability to feel a sense of belonging and build positive relationships with their communities.

If students are going to succeed academically and in the early stages of their careers, they need to feel safe and supported in their communities. They should not have to navigate an unfair rental housing landscape, inaccessible public transit systems, or inhospitable communities and targeted bylaw enforcement. And if town and gown communities are going to thrive, it is imperative that students be valued and engagement in municipal issues be fostered. Ultimately, provincial support is needed to ensure municipalities are able to meet the needs of all residents, including students, and to foster strong, positive relationships between universities and their municipalities.

HOUSING

ENSURING QUALITY AND AFFORDABLE STUDENT HOUSING

Principle: All student tenants should have access to safe, quality, and affordable housing within a reasonable distance from their respective post-secondary institution.

Principle: Landlords are responsible for providing and maintaining a residential complex, including the rental units in it, in a good state of repair and fit for habitation and for complying with health, safety, housing and maintenance standards.

Principle: Students should pay fair market-value for their accommodations.

Concern: Housing in predominantly student areas near campus often have some issues, including poor quality, physical safety, structural soundness, and lack of usable dwelling facilities.

Concern: The only way that tenants can hold their landlords accountable for the quality of housing and municipal property standards is retroactively through the Landlord Tenant Board or the Rental Housing Enforcement Unit, which can be ineffective to ensure students' ability to live in quality housing.

Concern: Near-campus housing and housing in predominantly student areas can have high rental rates for their value and the cost of living in their respective city.

Concern: Corporate-owned student housing and landlords with multiple properties can exploit their market power, which can diminish the power of students.

Concern: Students often do not pay fair market value for their accommodations.

Recommendation: The Ministry of Municipal Affairs and Housing should implement a standardized process that would require all landlords to register for an annual license of any rental property.

Recommendation: The provincial government should work with the Association of Municipalities of Ontario to establish an advisory committee on student housing issues to identify concerns and develop solutions to issues related to quality and affordability.

Recommendation: The provincial government should develop standardized rental increase communication guidelines that require notices for rent increases to include the original rent amount, the approved provincial increase, the new rental rate, and the period of time a tenant has to make an application to the Landlord Tenant Board should they be concerned about the validity of the increase.

In order for students who are living in off-campus housing while attending university to be successful in both their personal and academic life, it is crucial that they have access to housing within a reasonable distance of their institution, that meets reasonable standards of quality and affordability. In an effort to ensure that such standards are met, the Provincial Government should work with the Association of Municipalities of Ontario and the Ministry of Municipal Affairs and Housing to establish an advisory committee on student housing issues to identify concerns and develop solutions to issues related to quality and affordability. This committee should be composed of students and should represent the diversity of students across the province. Such a committee could look at the structure and purpose of the Waterloo Town and Gown Committee, which emphasizes student feedback, in their efforts to create a similar committee at the provincial level. The provincial committee would be made up of student representatives from all universities in the province, thus ensuring diverse representation. In addition, the committee should have relevant members from the province, such as the Minister of Municipal Affairs and Housing and the Association of Municipalities of Ontario (AMO), in order to facilitate effective, solution-oriented results. To ensure that this advisory committee adequately and meaningfully engages student perspectives, OUSA can and should work with the AMO in its establishment.

Students face particular concerns around the quality and affordability of housing, namely, access to quality student housing, difficulty holding landlords accountable for housing issues, and a lack of affordable housing that is close to campus. These three concerns pose significant barriers for students' personal safety and financial security, and must be addressed in order to ensure that housing is not a barrier to accessing and persisting in post-secondary education.

Students often have few options for housing that is of reasonable quality, is physically safe or structurally sound, and has usable or working dwelling facilities. Student rentals, such as that available in the Queen's University "University District", provide examples of the poor quality rentals available to students who want to live close to campus. The Queen's University "University District" has often been a source of poor-quality student housing in the form of "monster homes" - whereby landlords seek to maximize rental income by adding unit extensions to their properties or building new dwellings that cover the majority of the lot area. The pervasiveness of these poor quality units, coupled with low and often decreasing vacancy rates in many town and gown communities,¹ often leave students with few options for safe, quality housing. This also proves problematic because accommodations that are close to campus can be more expensive due to their proximity to campus, not necessarily because of its quality.

According to the *Residential Tenancies Act*, all tenants should be able to rely on their landlords to uphold a reasonable standard of quality and safety. However, this is hindered by the inability of student tenants to hold their landlords accountable for various issues such as mold, heating and cooling issues, as well as long delays in taking action to fix standard requests. For example a Waterloo-based company, Accommod8U, has recently been accused of having units that have "mold, vermin, carbon monoxide and fire alarm issues and faulty heating systems", and has also been "criticized for their response time, alleging that users often put in multiple requests for help that were ignored".² Although there are currently mechanisms for students to raise concerns related to poor quality living conditions, these mechanisms are reactive and there are significant limitations that make them ineffective for students (see "Resolving Disputes" below).

The Ministry of Municipal Affairs and Housing should take a proactive approach by implementing a standardized process that would require landlords to publicly certify that their property is physically safe, structurally sound, and has usable or working dwelling facilities. Through this process, the onus would be on landlords to prove and provide a report that states, prior to students moving in, that the unit is in a good state of repair, fit for habitation, and complies with health, safety, housing and maintenance standards. Additionally, landlords must provide, in their lease agreement, a general timeline in which issues will be attended to, as well as an agreed upon process for filing maintenance requests. Furthermore, in an effort to ensure that units meet minimum standards of quality, the Ministry of Municipal Affairs and Housing should implement a standardized process that would require all landlords to register for an annual license of any rental property that would require them to prove their unit meets minimum standards. An example of how this has been applied in practice is in the City of Waterloo, where low-rise residential rental units are required to obtain an annual license to ensure safe accommodations. This license would require that landlords complete an electrical system inspection, a gas or oil heating appliance inspection, provide proof of ownership and existing floor plans, and submit a police criminal record check.³ These steps would allow for student tenants to ensure that the unit that they will be renting meets minimum standards of safety and quality.

¹ For example, the average vacancy rate in Ontario was 2.0 percent as of October 2019, but cities with higher student populations like London and Guelph sit below the provincial average at 1.8 and 1.9 percent, respectively. Other cities with high student populations, such as Kingston and Kitchener-Waterloo, sit at average despite seeing an influx of students during the Fall and Winter academic terms: Canada Mortgage and Housing Information, "Primary Rental Market: Vacancy Rate (%), Ontario — Vacancy Rates by Bedroom Type by Metropolitan Areas, Census Agglomerations and Cities," (Housing Market Information Portal, October 2019), online: <https://www03.cmhc-schl.gc.ca/hmip-pimh/en/TableMapChart/Table?TableId=2.1.31.2&GeographyId=35&GeographyTypeId=2&DisplayAs=Table&GeographyName=Ontario>.

² Paula Duhatschek, "What the Accommod8u data leak shows about student housing," *CBC News*, September 18, 2019, online: <https://www.cbc.ca/news/canada/kitchener-waterloo/cbc-explains-what-theaccommod8u-data-leak-shows-about-the-state-of-student-housing-1.5286953>.

³ "Residential Rental Licenses," *The City of Waterloo*, accessed October 30, 2020, <https://www.waterloo.ca/en/living/residential-rental-licences.aspx#>.

Until such a certification is established provincially, institutions can fill this gap by establishing a platform where students can access a list of “approved” or “certified” landlords, and ratings can be made based on student testimonials and house inspections. This could be modelled off of McMaster University’s Student First Rentals program, which “encourages landlords to offer McMaster students flexible lease terms, rent reductions and thorough cleaning between tenants. In return, landlords receive a free, two-month premium listing on Mac’s off-campus housing listing – saving more than \$100 off the regular fee – as well as a badge for their listing that highlights their participation.”⁴

The issue of affordability is also evident in university towns – housing affordability was a concern raised in consultations conducted with students at the University of Waterloo, Queen’s University, Western University, and Wilfrid Laurier University – and poses an issue to student access and success. For example, according to Stats Canada, the cost of a one-bedroom unit in London, home to Western University, increased by \$138 from 2015 to 2019.⁵ This is a particular challenge for students who have, at the same time, had to manage high tuition costs and cuts to financial aid – domestic undergraduate tuition can cost Ontario students up to \$11,420, and international students up to \$55,110, while the province reduced its spending on student financial aid from \$2.04 billion to \$1.37 billion in 2019.⁶ Further, the average student graduates with \$26,000 of debt,⁷ an amount exacerbated by increases to average rental costs in university towns. This additional pressure not only adds to students’ stress, but also puts them at a disadvantage when they graduate and limits their ability to contribute fully to our economy. The challenge that high rent poses to university students was further illustrated during consultations with students where a majority of those consulted at Wilfrid Laurier University shared that rent will be a significant financial obstacle for obtaining their post-secondary education, an issue that is further exacerbated by landlords who increase rent by more than the annual provincially-approved amount. For example, the Wilfrid Laurier Students’ Union Student Rights Committee received an inquiry from a student tenant whose rent was increased by more than the provincially-approved amount, and they paid the new rate without knowing they did not need to. Instances like these can easily be avoided if students are educated about annual rental increase, and clear communication is sent to them indicating what such increases will be.

According the changes to the *Residential Tenancies Act* with the enactment of Bill 184, *Protecting Tenants and Strengthening Community Housing Act* in July 2020, “increases in rent that would otherwise be void as a result of a landlord’s failure to give at least 90 days’ written notice of the landlord’s intention to increase the rent” would be “deemed not to be void if the tenant has paid the increased rent in respect of each rental period for at least 12 consecutive months, provided the tenant has not, within one year after the date the increase is first charged, made an application in which the validity of the rent increase is in issue.”⁸ This creates a loophole for landlords to raise rent above the provincially-approved amount, without notice to the tenant. To protect student tenants from rent increases beyond the provincially-approved amount, the provincial government should develop a standardized rental increase communication guideline that would require all notices of rent increases to include: the pre-amended rental rate, the approved provincial increase, the new rental rate, and the period of time a tenant has to make an application to the Landlord and Tenant Board should they be concerned about the validity of the increase. This would provide students with the transparency required to make informed decisions and self-advocate against unregulated rent increases. This effort, coupled with the measures outlined in the “Disseminating Information and Education for Tenants” section, will ensure that students are educated

⁴ Sara Lux, “Student First Rental program recognizes student-friendly landlords during COVID-19,” *McMaster University Daily News*, June 30, 2020, online: <https://dailynews.mcmaster.ca/articles/student-first-rental-program-recognizes-student-friendly-landlords-during-covid-19/>.

⁵ Statistics Canada, *Table 34-10-0133-01 Canada Mortgage and Housing Corporation, average rents for areas with a population of 10,000 and over*, accessed September 29, 2020, online: <https://www150.statcan.gc.ca/t1/tbl1/en/tv.action?pid=3410013301&pickMembers%5B0%5D=1.96&pickMembers%5B1%5D=3.1&cubeTimeFrame.startYear=2015&cubeTimeFrame.endYear=2019&referencePeriods=20150101%2C20190101>.

⁶ “Tuition Fees by University,” *Universities Canada*, accessed September 29, 2020, online: <https://www.univcan.ca/universities/facts-and-stats/tuition-fees-by-university/>; Ryan Tishcoff, “What’s the Deal with the 2019 Changes to OSAP?,” *OUSA Blog*, September 17, 2019, online: https://www.ousa.ca/blog_osap_changes.

⁷ Steve McLean, “Canada needs more purpose-built student housing,” *Real Estate News Exchange*, April 23, 2019, online: <https://renx.ca/purpose-built-student-housing-canada-needs/>.

⁸ *Residential Tenancies Act*, S.O. 2006, ch. 17, ss. 135.1(1), (2).

on this issue in hopes of protecting them against landlords increasing their rent above what is provincially-approved.

DISSEMINATING INFORMATION AND EDUCATION FOR TENANTS

Principle: All student tenants must be able to easily access and understand their rights and responsibilities as renters.

Concern: Many student associations as well as institutions lack the necessary resources to provide adequate education to students about tenant rights and responsibilities.

Concern: The provincial government does not make an adequate effort to provide information about tenant rights and responsibilities to student renters in their respective cities.

Concern: Although the creation of the Standardized Lease Agreement is designed to protect tenants by regulating against the inclusion of illegal clauses, student tenants are still frequently taken advantage of by landlords because information about their rights and responsibilities is not clearly advertised.

Concern: Legal aid clinics across Ontario are overworked and underfunded which limits their ability to provide essential legal services to all those that require it.

Concern: Student associations and post-secondary institutions do not have the necessary resources to support students with legal issues.

Concern: Student tenants, especially international and non-official language speaking students, are vulnerable to predatory leasing practices.

Recommendation: The provincial government should work with Legal Aid Ontario, municipalities, university administrators, as well as student associations to adequately fund the promotion and reinforcement of tenant rights and responsibilities, with an emphasis on reaching international and non-official language speaking students.

Recommendation: The provincial government should reinvest in provincial legal aid, earmarking funding to support student access to legal services.

Recommendation: The provincial government should provide grant funding, available to on campus and community legal services or other student-serving groups, to establish access to free legal services for students.

In order for students to properly understand their rights and responsibilities as tenants, it is crucial that such information is easily and readily available. Informing and educating student tenants is particularly important because many students are first-time or new renters and may therefore lack experience and knowledge. Ensuring that students are knowledgeable of their rights and responsibilities allows them to be better neighbours and protects them from being taken advantage of. Despite these benefits, there is currently not enough being done to educate student tenants about their rights and responsibilities. According to a survey conducted by the City of Waterloo Town and Gown Committee, 33 percent of respondents did not feel as though they were informed about their rights and responsibilities as a tenant, and only 55 percent of students felt only somewhat comfortable.⁹ Gaps in education around tenants' rights and responsibilities was also a common concern that was raised in all consultations done with students at OUSA member schools.

This lack of knowledge, among other concerns cited in this paper, can create or exacerbate bylaw issues and make students vulnerable to predatory landlords. These concerns could be reduced, if not potentially

⁹ Student Housing Ad Hoc Working Group, *2014 Student Accommodations Review: Waterloo Postsecondary Student Housing* (Waterloo: City of Waterloo Town & Gown Committee, 2015), 10.

be avoided, through effective education. The provincial government has implemented various measures to protect tenants from predatory landlords, such as introducing the Standardized Lease Agreement which helps to prevent landlords from getting prospective tenants to sign lease agreements with illegal clauses. However, the existence of the Standardized Lease Agreement is not enough to protect student tenants. Those who provide off-campus housing support for students are concerned that there continue to be students who sign non-standard lease agreements simply because they are unaware that the Standardized Lease Agreement exists, or that they may have access to services to review their lease. Students are also vulnerable to other predatory practices that cannot be protected against through a Standardized Lease Agreement. For example, at the start of the COVID-19 pandemic, a rental company in Waterloo asked tenants to sign repayment agreements that included “a section 78 clause that permits the landlord to seek an eviction order (‘ex parte’) without a hearing or notice if the tenant breaches the agreement”, meaning that should the tenant fail to meet the payment requirements laid out in the agreement, they could face eviction without access to a hearing.¹⁰ Many students signed this agreement due to a lack of education and failure to consult anyone. This is a notable example of how landlords are able to take advantage of vulnerable students who are not familiar with their rights as tenants and further illustrates the need for adequate student education and preparation.

To ensure students are adequately informed and protected, the provincial government should work with municipalities, university administrators, as well as student associations, to adequately fund the promotion and reinforcement of tenant rights and responsibilities. The provincial government should not be solely responsible for delivering or disseminating this information to students and they are not in the best position to do so. Because some resources already exist, such as Community Legal Education Ontario, the province should work to promote these resources in an effort to help students understand the *Residential Tenancies Act* and the Standardized Lease Agreement. The provincial government should, however, ensure that those who are best positioned to deliver and disseminate this information are adequately funded to do so. Funding provided by the provincial government would allow for student associations and municipalities to provide education to students. This would help support existing campaigns such as door knocker “know your rights” campaigns, or educational programs delivered by an institution and/or their respective student association. In order to effectively do this, the provincial government should create a grant program that funds education campaigns geared towards tenant rights and responsibilities. Student associations, campus housing services, or other institutional housing-related groups should be eligible to apply, and can partner with municipalities or tenant advocacy groups to educate student tenants. Such initiatives should be done with international and non-official language speaking students in mind because such individuals who are not comfortable with the language of lease agreements may be particularly vulnerable to predatory leasing practices. This would not only provide students with access to important information, but would also create experiential learning opportunities for students who work with these partners.

An important supplement to education is access to reliable and affordable legal advice or support. However, securing legal support as a tenant is difficult. According to the Advocacy Centre for Tenants Ontario, 79.5 percent of landlords had representation at Landlord and Tenant Board hearings, compared to only 2.6 percent of tenants. This highlights the stark imbalance of power between landlords and tenants.¹¹ While legal aid services do exist, legal aid clinics across Ontario are often overworked and underfunded. Inadequate support for current and future legal services limits the ability of legal aid clinics to provide essential legal services to all those that require it.¹² To ensure that student tenants have access to legal advice without incurring undue financial burdens, the provincial government should reinvest in provincial legal aid over the next three years, earmarking funding to support student access to legal services. Additionally, the provincial government should provide grant funding that will allow student associations to provide free access to legal services, similar to that provided through the Waterloo Undergraduate Student Association’s Student Legal Protection Program (SLPP). The SLPP provides legal advice on any subject relating to students, including those related to housing and tenant rights, such as

¹⁰ Dania Majid, 5 Bill 184 Changes to the Law that Tenants Must Know,” ACTO Blog, July 27, 2020, online: <https://www.acto.ca/5-bill-184-changes-to-the-law/>.

¹¹ *We Can't Wait: Preserving Our Affordable Rental Housing in Ontario* (Advocacy Centre for Tenants Ontario, November 2019).

¹² Frederick Zemans and Justin Amaral, “A Current Assessment of Legal Aid in Ontario,” *Journal of Law and Social Policy* 29, no. 1 (2018): 1-28, online: <https://digitalcommons.osgoode.yorku.ca/cgi/viewcontent.cgi?article=1310&context=jlsp>.

rent issues, lease issues, apartment safety, major repairs, and apartment repossession.¹³ These suggestions would ensure that students know their rights and would empower them to hold their landlords accountable.

RENTAL LICENSING

Principle: All rental units should be maintained in a good state or repair.

Principle: Everyone has the right to equal treatment in housing without discrimination and harassment.

Principle: Landlords and tenants deserve access to public and accurate information about prospective tenancies.

Concern: High-occupancy tenancies are often neglected by landlords and property managers.

Concern: Information regarding landlords' history with the Landlord and Tenant Board is not easily accessible for prospective tenants.

Recommendation: The Ministry of Municipal Affairs and Housing should mandate municipalities to create more stringent rental bylaw processes with an emphasis on high-occupancy tenancies.

Recommendation: The Ministry of Municipal Affairs and Housing should establish a free, province-wide, public database of landlords to ensure quality and transparency between landlords and tenants.

More than 1.5 million full-time students are currently enrolled in Canadian universities and colleges.¹⁴ With those 1.5 million full time students comes a corresponding demand for housing in their university communities. Student housing plays a significant role in “shaping the economic and social sustainability of communities and is a vehicle for social inclusion and an important component of growth.”¹⁵ Where there is a demand for housing, there are also those looking to make a profit off of it, and many investors have taken notice of students' need for housing in university communities in recent years. Landlords looking to make an investment in student-populated areas are not an issue until these students are seen solely as a source of revenue and no longer as tenants who deserve safe and reliable housing. This is exacerbated by the fact that unkempt housing is seen as a typical rite of passage for many post-secondary students. Students across Ontario deserve access to safe and affordable housing.

Many students live in high-occupancy tenancies. High-occupancy tenancies are generally defined as rental units that have 6 or more people renting the same living space. The regulations surrounding the number of bedrooms you can have in a single unit vary from city to city, but many high-occupancy tenancies are not in compliance with municipal regulations. Horror stories of landlords renting as many as 10 bedrooms in a single student home are common within student circles.¹⁶ High-occupancy tenancies can often be financially lucrative for landlords as students generally sign joint leases where they pay rent based on the number of bedrooms in the home. Currently, a detached home might be rented for \$1,500 in the city of Waterloo, yet the same unit could be rented to five students for \$600 per unit for a total of \$3000. Many landlords try to renovate student homes to have the maximum number of bedrooms so they can collect the maximum amount of rent for the property. And while cities may have regulations surrounding the number of bedrooms that can be rented in a single house, these regulations are not actively enforced. When these unlawful renovations happen, the burden is on students to report their

¹³ “Student Legal Protection Program,” WUSA, accessed 26 October 2020, <https://wusa.ca/services/student-legal-protection-program>.

¹⁴ “Huge Demand For Student Housing Makes It A Lucrative Opportunity For Investors,” *Rental Housing Business*, accessed September 29, 2020, online: <https://www.rentalhousingbusiness.ca/huge-demand-for-student-housing-makes-it-a-lucrative-opportunity-for-investors/>.

¹⁵ Ministry of Municipal Affairs and Housing, *Municipal Tools for Affordable Housing* (Toronto: Queen's Printer for Ontario, 2011), 2-3.

¹⁶ Mark Brown, “Horror stories from off-campus housing,” *Maclean's*, December 6, 2017, online: <https://www.macleans.ca/education/university-students-share-off-campus-student-housing-horror-stories/>.

landlords. However, there are unique barriers to accessing existing reporting mechanisms for students, who often lack the knowledge, experience, time, motivation, and/or financial ability to take this on, explored below in “Resolving Disputes”. In addition to implementing a standardized certification process for landlords and funding education campaigns for student tenants,¹⁷ the Ministries of Municipal Affairs and Housing should incentivize municipalities to create more stringent rental bylaw processes for high-occupancy tenancies. This type of regulation will prevent students from being taken advantage of in their search for near-campus, high-occupancy rental units.

Beyond high-occupancy tenancies, students often share stories about landlords who do not tend to their homes and do not adhere to their responsibilities under the *Residential Tenancies Act*. Though the burden of maintaining a rental unit falls on both the landlord and the tenant, extensive issues with the wear and tear of apartments is the landlord’s responsibility. Between not repairing appliances when necessary, rental units not being cleaned prior to tenants moving in, frivolous charges being laid, and not complying with other duties outlined in leases, students often accumulate a laundry list of concerns once they have their first negative experience with a landlord. Unfortunately, there is not a reliable way to track this information, as much of this information is spread by word-of-mouth. Furthermore, many students rent for short periods of time, meaning this information is easily lost as a new cohort of students graduates each year.

In response to this issue, Manitoba has recently seen great success with the launch of the landlord and tenant database housed under the province’s Residential Tenancies Branch. This program allows one to look up both landlords and tenants in Manitoba for a fee of \$5 for half an hour of database use.¹⁸ This database shares any public orders against a landlord from the Landlord and Tenant Board, including active claim orders, possession orders, rent payment redirects, repair orders, security deposit orders, uninhabitable orders, or utility orders.¹⁹ Tenants are able to search the database either by name of their landlord, rental company, or the address of the property that they are renting. Implementing a similar database in Ontario through the Ministry of Municipal Affairs and Housing would increase transparency between both landlords and tenants. This database should be free and publicly available, with limits placed on information-gathering to prevent data mining. This will ensure that both parties have access to necessary information and objective information from the Landlord and Tenant Board to make informed decisions before signing lease agreements.

AMENDING PROVINCIAL LEGISLATION

Principle: All student tenants should be fully protected under the *Residential Tenancies Act*.

Principle: All student boarders should be protected under the *Ontario Human Rights Code*.

Concern: Students report that landlords act in violation of the *Residential Tenancies Act* within their rental agreements, including but not limited to: withholding repairs and maintenance, attempting to enter a rental unit without cause or proper notice, and/or requesting confidential information from tenants.

Concern: Some landlords do not honour agreements made in their leases with tenants, including rental units not being ready on contractually agreed upon move-in dates, without offering pro-rated rent.

Concern: The *Residential Tenancies Act* does not fully account for the unequal bargaining power between landlords and tenants.

Concern: There are few pre-occupancy protections for tenants under provincial law.

¹⁷ See recommendations in “Ensuring Quality and Affordable Housing” and “Disseminating Information and Education for Tenants”.

¹⁸ Katie Nicholson, “I-TIP: Look up your landlord,” *CBC News*, March 5, 2017, online: <https://www.cbc.ca/news/canada/manitoba/iteam/i-tip-look-up-your-landlord-1.4005096>.

¹⁹ *Ibid.*

Recommendation: The Ministry of Municipal Affairs and Housing should review the *Residential Tenancies Act* and consult with student and tenant rights advocacy groups to identify and eliminate gaps in pre-tenancy rights.

Recommendation: The provincial government should amend the *Residential Tenancies Act* to require that, in the case that extensive construction on a rental unit is not complete on a contractually binding move-in day, tenants are returned their deposit and rent payments for the period of time they are not occupying the unit, regardless of whether or not the tenant chooses to terminate the lease.

Recommendation: The provincial government should amend section 83(6), Refusal for certain arrears of rent, of the *Residential Tenancies Act* to protect a tenant's ability to raise the defence at arrears of rent hearings.

Recommendation: The provincial government should amend section 78(7), Order for arrears, of the *Residential Tenancies Act* to no longer subject former tenants to hearings at the Board without proper service of legal documents.

Recommendation: The provincial government should amend the *Residential Tenancies Act* to prohibit landlords from collecting rental deposits prior to a building obtaining a Final Occupancy Permit.

Recommendation: The provincial government should amend the *Ontario Human Rights Code* to ensure that the right to be free of discrimination applies to boarders who share bathroom and kitchen facilities with their landlord or their immediate family.

All students should be protected by the *Residential Tenancies Act* (RTA), however, as the legislation currently stands, many of the concerns felt by students across Ontario are not being actively addressed. Students are a specific and particularly vulnerable population as predominantly first-time renters in Ontario. Compared to other age cohorts, the student-age population disproportionately lives in renter households, with 80 percent of 20-24 year old Ontarians renting their home.²⁰ This exacerbates the inherent power imbalance between landlords and tenants. This imbalance allows many landlords to not honour agreements made in leases, such as not having rental units ready on contractually-agreed upon move-in dates. Additionally, it is common practice for landlords to knowingly include misleading clauses that contradict the RTA in their leases. One such clause is the 'no pets' clause that is found in many leases and directly contradicts section 14 of the RTA.²¹ The RTA should actively account for the unequal bargaining power between landlords and student tenants that leaves students vulnerable to such practices. As a first step, the Ministry of Municipal Affairs and Housing should consult with student and tenants' rights advocacy groups to review the RTA and eliminate gaps in pre-tenancy rights. By consulting with students on their specific tenancy issues, the Ministry of Municipal Affairs and Housing can better support student tenants across Ontario.

In July 2020, the Ontario government passed Bill 184, *Protecting Tenants and Strengthening Community Housing Act*. This Act was intended to respond to some of the complications with rentals that arose due to COVID-19 with the ultimate goal "[t]o strengthen protections for tenants and make it easier to resolve landlord and tenant disputes, while preventing unlawful evictions."²² However, several of the changes made to RTA through this legislation will not positively impact tenants, and some changes leave tenants vulnerable. One of these changes is that a tenant no longer can raise a defence at hearings for arrears of rent.²³ This means that if a tenant withholds rent, as they are legally entitled to under the RTA,²⁴ they may no longer be able to defend themselves in a dispute in front of the Landlord and Tenant Board. Many critics of this Bill argue that it makes it easier for landlords to evict tenants and weakens a

²⁰ *We Can't Wait: Preserving Our Affordable Rental Housing in Ontario* (Advocacy Centre for Tenants Ontario, November 2019).

²¹ *Residential Tenancies Act*, S.O. 2006, ch. 17 [RTA], s. 14.

²² *Ontario Passes Historic Legislation During Unprecedented Times: Backgrounder* (Office of the Premier, July 22, 2020), online: <https://news.ontario.ca/en/backgrounder/57713/ontario-passes-historic-legislation-during-unprecedented-times>.

²³ RTA, s. 83(6).

²⁴ RTA, s. 12.1(6).

tenant's bargaining position within their rental agreement.²⁵ Furthermore, the changes under Bill 184 mean that a former tenant may be subject to appear in front of the Landlord and Tenant Board without being served legal documents.²⁶ This can have a negative impact on students who have higher rental turnover rates than other tenants as they often stay in their rental units for only one to three years. These changes exacerbate the existing imbalance of power between landlords and student tenants, and therefore the provincial government should amend sections 83(6) and 78(7) of the RTA to protect a tenant's ability to raise the defence at an arrear of rent hearings and to no longer subject former tenants to hearings at the Landlord and Tenant Board without proper service of legal documents.

Given the high turnover rates of student tenancies and availability of safe and high-quality student rentals,²⁷ these properties are always in high-demand. As a result, students often sign their leases well in advance of the start of their tenancy in order to secure needed housing to pursue their education. However, this creates a concern and highlights gaps that exist in pre-tenancy rights that impact many students across Canada. Specifically, there have been many instances of rental units not being habitable on contractually-agreed upon or designated move-in date, where units are mid-renovation leaving student tenants unable to access the unit they are renting.²⁸ During consultations with students at OUSA member schools, students noted that this created a lot of stress and negatively impacted their academic performance and their mental health. To eliminate this concern, the provincial government should amend the RTA to require that, in the case that extensive construction on a rental unit is not complete on a contractually binding move-in day, tenants are returned their deposit and any rent payments for the period they are not occupying the unit; and to prohibit landlords from collecting rental deposits prior to a building obtaining a Final Occupancy Permit. Extensive construction should meet the same standard as outlined in the RTA.

Additionally, many students rent homes that are owned by their roommates' parents because it allows them to live with friends and have a trusted relationship with their landlord. However, this can create new challenges for students, as sharing bathroom and kitchen facilities with a landlord or their family means that these students are legally defined as "boarders" and not tenants, who do not have the same legal remedies or protections as tenants under the RTA or the *Ontario Human Rights Code (Code)*.²⁹ This can leave them vulnerable to forms of discrimination that "tenants" are protected from under the *Code* and removes remedies in cases where the student boarder experiences discrimination or harm based on their race, sexuality, gender, or other *Code*-protected factors. To remedy this situation, the provincial government should amend the *Code* to ensure that the right to be free of discrimination applies to tenants who share bathroom and kitchen facilities with their landlord or their landlord's immediate family.

RESOLVING DISPUTES

Principle: All student tenants should have access to fair and timely dispute resolution when landlords are not meeting their legal obligations.

Principle: Transparency and access to information are crucial to ensuring the legitimacy and integrity of tribunals.

Concern: Seeking recourse and restitution through the Landlord and Tenant Board or the Rental Housing Enforcement Unit can be confusing and time-consuming processes for student tenants due to the complexity of the process and the lack of information students have.

²⁵ Jake Kivanc, "Advocates say new bill gives an unfair advantage to landlords over tenants," *City News*, July 3, 2020, online: <https://toronto.citynews.ca/2020/07/03/advocates-say-new-bill-gives-an-unfair-advantage-to-landlords-over-tenants-2/>.

²⁶ "Bill 184: Wrong Bill, Wrong Time," *ACTO*, accessed September 29, 2020, online: <https://www.acto.ca/campaign/bill-184-wrong-bill-wrong-time/>.

²⁷ See concerns in "Ensuring Quality and Affordable Housing".

²⁸ Jeff Pickel, "Will they be ready? Waterloo tracks new student housing developments," *CTV Kitchener*, August 26, 2019, online: <https://kitchener.ctvnews.ca/will-they-be-ready-waterloo-tracks-new-student-housing-developments-1.4565284?cache=%3FclipId%3D68596>.

²⁹ Human Rights Code, R.S.O. 1990, c. H.19, s 21, <https://www.ontario.ca/laws/statute/90h19>.

Concern: Students are deterred from filing claims with the Landlord and Tenant Board because of the fees associated with the application.

Concern: The disconnect between the Landlord and Tenant Board and the Rental Housing Enforcement Unit create additional hardships and complications for tenants seeking to resolve their disputes.

Concern: If a landlord does not comply with a decision made by the Landlord and Tenant Board, student tenants have to seek enforcement through the courts, which is prohibitively expensive and time-consuming for students.

Recommendation: The Ministry of the Attorney General should appoint a sufficient number of adjudicators in order to ensure that claims made to the Landlord and Tenant Board by student tenants and other vulnerable demographics meet the Landlord and Tenant Board Service Standards.

Recommendation: After the completion of the Ontario Ombudsman’s investigation into the delays of the Landlord and Tenant Board, the Ministry of Municipal Affairs and Housing should consult campus student housing groups and student associations to respond to the findings of the inquiry.

Recommendation: The Ministry of the Attorney General and the Ministry of Municipal Affairs and Housing should establish a single complaints and claims process by developing a clear and comprehensive plan for the integration of the Landlord and Tenant Board and of the Rental Housing Enforcement Unit.

Recommendation: The provincial government should amend the Fee Waiver eligibility requirements to be inclusive of OSAP-eligible students and students with demonstrated financial need.

The ability for students to access accountability mechanisms when landlords do not meet their legal obligations is crucial to their success as tenants. Recently, more and more students are concerned about the length of time it takes to resolve issues through mechanisms, such as the Landlord and Tenant Board (LTB). This issue, when coupled with the fact that students are often unaware of how the LTB works, can be a strong barrier for students seeking to hold their landlords accountable. This is a particularly pressing issue across the province – the Ontario Ombudsman recently launched an investigation into the apparent delays at the LTB, stating that they have received an increase in complaints about delays in recent years. They have noted that such delays “have a very real human impact”.³⁰ This issue is exacerbated for students who are typically only in their campus communities between four and eight months at a time. For students who return to a permanent residence in a different region or who are working in a new place, they may not be able to deal with prolonged wait times at the LTB. For example, figures from Tribunals Ontario indicate that it can take almost nine weeks for the LTB to hear applications by tenants.³¹ Long delays and the likelihood of not having a claim addressed during their academic term can prevent students from accessing one of the only accountability mechanisms available to them. In an effort to ensure that students and other vulnerable demographics are not discouraged from holding their landlords accountable, the provincial government should take active steps to address the delays at the LTB. This delay has also been noted by Advocacy Centre for Tenants in Ontario who “worry that it's creating pressure to support the landlord argument that tenants' rights to dispute these applications should be restricted or taken away” in an effort to streamline the process.³²

One commonly recognized factor contributing to these delays is the insufficient number of adjudicators appointed to, and actively hearing cases at, the LTB. According to Tribunals Ontario officials, “39 adjudicators are currently appointed to the LTB, but only 28 of them are actively hearing cases.” This is only half of what those familiar with the LTB’s workings say would be most effective at 55 to 60 active appointments.³³ Thus, because this issue negatively affects tenants as a whole, the Ministry of the

³⁰ “Ontario Ombudsman To Investigate Delays At Landlord And Tenant Board,” *Ombudsman Ontario*, January 9, 2020, online: <https://www.ombudsman.on.ca/resources/news/press-releases/2020/ontario-ombudsman-to-investigate-delays-at-landlord-and-tenant-board>.

³¹ Mike Crawley, “Growing delays at Ontario rental tribunal have tenants fearing what Ford government will do next,” *CBC News*, December 20, 2019, online: <https://www.cbc.ca/news/canada/toronto/ontario-landlord-tenant-board-hearing-delays-1.5400739>.

³² *Ibid.*

³³ *Ibid.*

Attorney General should appoint a sufficient number of adjudicators to the LTB to ensure that claims made are heard within the timelines outlined in the Landlord and Tenant Board Service Standards.³⁴ According to “[p]eople familiar with the board’s workings”, the number of active adjudicators necessary to meet these standards is between 55 and 60.³⁵

In addition, the Ministry of Housing and Municipal Affairs should, when the Ontario Ombudsman’s report is complete, work with various student associations to ensure that student perspectives are noted and accommodated in any actions taken to address the concerns identified in the report. This should be done alongside the recommendations proposed in “Disseminating Information and Education for Tenants” in order to address student concerns around timeliness and complexity or lack of understanding of accountability processes. Improving the system with student input and educating students will make them more inclined to use the LTB in its intended capacity to resolve disputes.

Another major barrier to holding landlords accountable are the fees associated with the application process for the LTB. Students are already in a precarious financial position – 71 percent of Ontario university students who participated in OUSA’s Ontario Post-Secondary Student Survey indicated that they were either somewhat or very concerned about having enough money to complete their education³⁶ – and often do not have the additional financial means necessary to initiate or respond to a claim at the LTB. While the LTB does have a fee waiver option available to low-income applicants, the current application process, where students are only able to qualify if their household income is below a predetermined amount, leaves gaps in access for students in particular.³⁷ For example, a student’s household income may include money earned by parents, regardless of whether their parents are able or willing to contribute to cover such fees. Household income does not necessarily translate into money that is accessible to students. Thus, the provincial government should amend the Fee Waiver eligibility requirements to be inclusive of OSAP-eligible students and students with demonstrated financial need.

Another notable example of how students are discouraged from using the LTB to rectify their landlords’ illegal acts is the fact that the LTB has no power to enforce their ruling if the landlord chooses not to comply with the decision which, as a result, either further delays students from getting their result, or means that students do not get their result; both of which are unacceptable. Thus, in an effort to ensure that decisions will be upheld without undue delay, the Ministry of the Attorney General and the Ministry of Municipal Affairs and Housing should establish a single complaints and claims process by developing a clear and comprehensive plan for the integration of the Landlord and Tenant Board and of the Rental Housing Enforcement Unit. This will ensure that students have faith in the system and will not be deterred from holding their landlord accountable.

TRANSIT

EXPANDING INTER-REGIONAL TRANSIT

Principle: Inter-regional transit is essential for students who commute from or reside in different areas than their post-secondary institution.

Principle: Inter-regional transit should provide consistent and reliable access to a student’s post-secondary institution.

³⁴ “LTB: Service Standards,” *Tribunals Ontario*, accessed December 1, 2020, online: <https://tribunalsontario.ca/ltb/service-standards/>.

³⁵ Crawley, “Growing delays at Ontario rental tribunal”.

³⁶ Ryan Tishcoff, *Affordability: Results from the 2017 Ontario Post-Secondary Student Survey* (Toronto: Ontario Undergraduate Student Alliance, 2019), online: https://www.ousa.ca/reports_opsss_2017_affordability.

³⁷ “Practice Direction on Fee Waiver,” *Landlord and Tenant Board*, January 16, 2017, online: [https://tribunalsontario.ca/documents/ltb/Practice%20Directions/Practice%20Direction%20on%20Fee%20Waiver%20\(Jan%2016%202017\).html](https://tribunalsontario.ca/documents/ltb/Practice%20Directions/Practice%20Direction%20on%20Fee%20Waiver%20(Jan%2016%202017).html).

Principle: Lack of consistent and reliable inter-regional transit should not be a barrier for students to attend the institution of their choice.

Principle: Both private and public providers have a role to play in building stronger inter-regional transportation networks in Ontario.

Concern: There are a lack of transit routes connecting different municipalities and the routes that do exist often lack coordination and interconnectivity.

Concern: The inability to easily move between municipalities can negatively impact a student's experience while studying and/or living in a municipality outside of their permanent residency.

Concern: Students in municipalities with few inter-regional transit options lack affordable means of travel.

Concern: There are limited direct transportation options for students wishing to travel between regional or international airports and university campuses.

Concern: Abolition of the *Public Vehicles Act* does not make clear what the future of bus company licensing in Ontario will resemble, creating uncertainty for students about market failure through destructive competition, leading to less cross-subsidization of unprofitable routes by public transit providers affecting students on those routes.

Recommendation: The Ministry of Transportation should coordinate with Metrolinx and the Ontario Northland Transportation Commission to develop an environmentally sustainable, long-term, inter-regional transit plan that would take into account post-secondary institutions.

Recommendation: The provincial government should reinvest in a high speed rail along the Windsor-Toronto Corridor and the Toronto-Ottawa corridor.

Recommendation: The provincial government should amend Ontario Regulation 189/09: Go Transit Service Area to expand transit routes throughout the province, ensuring that all students have access to inter-regional transportation services.

Recommendation: The provincial government should establish direct transportation routes connecting post-secondary transit hubs to regional and international airports in the province.

Recommendation: The provincial government should pause the repeal of the *Public Vehicles Act* and reform the Act to align with the 2016 Intercity Bus Modernization discussion document and the results of consultations with student stakeholders and experts.

Recommendation: The provincial government should commit to a long-term expansion of provincial contributions to the Metrolinx operating and capital budgets to facilitate long-term labour stability and the ability for Metrolinx to offer transit services to students in areas not economically viable to service through the private sector.

Inter-regional transportation is crucial not only for post-secondary students, but municipalities at large. From visiting family and friends, to commuting to work and school, or just getting around, a strong inter-regional transit system is a necessity. It is crucial that the provincial government recognizes the importance of inter-regional transit and evolves to meet the needs of the population. While efforts have been made to “facilitate new and innovative choices for intercity passenger travel”, more efforts should be made to break down barriers affecting Ontario's post-secondary students as transit systems in the

province continue to develop.³⁸ Consistency and reliability of inter-regional transit are themes at the forefront of this topic.

There are several major concerns regarding inter-regional transit in the post-secondary education sector. Primarily, students are concerned about the lack of adequate inter-regional transit services available to them. Residents in both northern and southern Ontario have stressed the importance of having bus service in their communities, describing it as a necessity.³⁹ According to Sean Marshall, a Toronto-based geographer, the state of inter-regional transit in Ontario, apart from major corridors between bigger metropolitan areas, is bleak.⁴⁰ For instance, in 2015, Greyhound cut the number of buses between Ottawa and Sudbury in half.⁴¹ From Kenora to Cornwall, these cuts are affecting rural residents' access to important amenities, namely education.⁴² Potential students have acknowledged ineffective inter-regional transit as a barrier to accessing education.⁴³ Further, students from rural communities have expressed the scarcity of transportation routes as a factor preventing them from attending universities of their choice.⁴⁴ Researchers have noted that students' commute distances strongly influence their academic decisions. The further a student lives from campus, the less likely they are to travel there. Similarly, there is a positive relationship between students' travel time between their home and post-secondary institution and the likelihood that said students choose courses based on their commute.⁴⁵ A lack of transportation, in addition to ineffective transportation, should never be a barrier to a student's access to education.

Inter-regional connectivity is vital for rapidly growing cities like Kitchener, London, and Windsor. These municipalities lack the necessary connections for students to efficiently travel throughout these urban corridors.⁴⁶ Despite the geographic proximity of small to medium-sized cities within southern Ontario, compartmentalized transit systems inhibit efficient and affordable travel. For example, there are few direct routes to travel between Guelph and Hamilton in the GTA.

In order to address these concerns and ameliorate conditions for post-secondary students, the Ministry of Transportation should coordinate with Metrolinx and the Ontario Northland Transportation Commission (ONTC) in developing a sustainable, long-term, inter-regional transit plan that takes into account the needs of post-secondary students and institutions. One example of how post-secondary students can be supported in through the use of post-secondary institutions as inter-regional transit hubs. Using post-secondary institutions as inter-regional transit hubs is feasible as these areas are already densely populated with individuals who make use of public transit. Creating these hubs would allow for more efficient access to (and between) universities. York University is one example of an institution that already hosts a transit hub that is widely used – 80 percent of York University students use public transit to access campus. This can be compared to Trent University Durham GTA whose campus is not serviced by a diverse and multi-modal transit hub – 70 percent of Trent University Durham GTA students in 2019 planned to make their commute via automobile.⁴⁷ A transit hub enables local and regional modes of transportation to converge in a central location,⁴⁸ making travel easy, accessible, and efficient. The Ministry of Transportation should work with Metrolinx and the ONTC to develop transit plans that

³⁸ *Intercity Bus Modernization: Creating Opportunities and Connecting Ontario Communities* (Ministry of Transportation, June 2016), online: <http://www.mto.gov.on.ca/english/transit/pdfs/intercommunity-bus-proposal.pdf>, 1.

³⁹ *Ibid.*

⁴⁰ Sean Marshall, "How intercity bus service is failing Ontarians," *TVO*, November 28, 2017, online: <https://www.tv.org/article/how-intercity-bus-service-is-failing-ontarian>.

⁴¹ *Ibid.*

⁴² *Ibid.*

⁴³ Lynn Bowering Consulting, *The Road Ahead: A study of transportation needs across Huron and Perth Counties* (Stratford: The Social Research & Planning Council, 2012), 19.

⁴⁴ *Ibid.*

⁴⁵ *An overview of early findings* (StudentMoveTO, April 2016), online: http://www.studentmoveto.ca/wp-content/uploads/2016/04/StudentMoveTO.Handout_4Uni.v2.pdf.

⁴⁶ John Michael McGrath, "Building the corridor: what all-day GO service means for Toronto and Waterloo," *TVO*, June 16, 2016, online: <https://www.tv.org/article/building-the-corridor-what-all-day-go-service-means-for-toronto-and-waterloo>.

⁴⁷ *Union Station West: The second transit hub we need to keep the region moving* (Urban Strategies Inc., 2019), online: <https://tpprocdnep.azureedge.net/-/media/project/pearson/content/community/supporting-communities/pdfs/union-station-westfinal-updated.pdf?modified=20191206134600&la=en>.

⁴⁸ Should the city subsidize your Uber? What's behind Ontario's controversial push for private 'microtransit' (Government of Ontario, October 31, 2017), online: <https://news.ontario.ca/en/release/46831/major-new-transit-hub-in-toronto-takes-next-step-forward>.

consider solutions such as post-secondary transit hubs or other solutions that address inter-regional connectivity concerns raised by students. Importantly, transit plans should account for the needs of out-of-province, northern Ontario, and international students who require access to airports to travel home by establishing direct transportation routes connecting post-secondary transit hubs to regional and international airports in the province.

Inter-regional transit can also be enhanced with investments in high speed rail. Students who travel along the Windsor-Toronto corridor and the Toronto-Ottawa corridor to attend university require “frequent, efficient and fast public transportation between regional hubs” that is offered safely through high speed rail.⁴⁹ Provincial efforts to implement high speed rail along the Windsor-Toronto corridor have already been undertaken, and therefore OUSA asks that the provincial government build on the work that has already been done through consultations with stakeholders, environmental assessments, and other planning efforts and reinvest in the Windsor-Toronto high speed rail project, and begin work on a high speed rail plan connecting Ottawa, Kingston, and Toronto. As part of this work, the provincial government should identify “opportunities to integrate local transit to ensure first-mile/last-mile connections are made”⁵⁰ (see more below in “Active Transit”), and ensure that student needs are met.

OUSA also calls on the provincial government to amend Ontario Regulation 189/09: Go Transit Service Area to expand transit routes throughout the province, ensuring that all students have access to inter-regional transportation services. As stated previously, not all students have access to such services, especially those living in remote and rural areas. Because of the lack of infrastructure available for rural students, it is important to amend legislation to accommodate for these individuals. Importantly, expansion of transit infrastructure for rural and northern regions should account for regional differences and adjust service provision and passenger costs to be appropriate for these areas. It is critical that all students have the same ability to use these services, not only for transportation to and from their respective institutions, but for general commuting purposes.

Students believe that both private and public providers have a role to play in building stronger inter-regional transportation networks in Ontario. However, in October 2020, the introduction of Bill 213, *An Act to reduce the administrative burden on people and businesses by enacting, amending or repealing various Acts and repealing a regulation*, began the process to repeal the *Public Vehicles Act*, a move that “suggests a near-total de-regulation of the bus transportation industry in Ontario”.⁵¹ While public vehicle licensing requires modernization, abolition of the *Public Vehicles Act* does not make clear what the future of bus company licensing in Ontario will resemble, creating uncertainty for students about market failure through destructive competition, leading to less cross-subsidization of unprofitable routes by public transit providers affecting students on those routes. OUSA therefore asks that the provincial government should pause the repeal of the *Public Vehicles Act* and instead reform the Act to align with the 2016 Intercity Bus Modernization discussion document⁵² and the results of consultations with student stakeholders and experts. Additionally, the provincial government should commit to a long-term expansion of provincial contributions to the Metrolinx operating and capital budgets to facilitate long-term labour stability and the ability for Metrolinx to offer transit services to students in areas not economically viable to service through the private sector.

⁴⁹ David Collenette, *High Speed Rail in Ontario: Transforming mobility, connecting communities, integrating centres of innovation and fostering regional economic growth and development* (Special Advisor for High Speed Rail: Final Report, December 2016), online: <http://www.mto.gov.on.ca/english/publications/high-speed-rail-in-ontario-final-report/>.

⁵⁰ Ibid.

⁵¹ David F. Blair, Brian Lipson, Alexandre Saulnier-Marceau, and Vincent Savard, “Ontario moves to deregulate the inter-city busy industry,” *McCarthy Tétrault Moves*, October 8, 2020, online: https://www.mccarthy.ca/en/insights/blogs/mccarthy-tetrault-moves/ontario-moves-deregulate-inter-city-bus-industry?fbclid=IwAR1UPQjGWZVebNesWQujCf3rd3qp_Zy5RLSqrXPlluiZ5kEj6jHcO95Gsjw.

⁵² Ministry of Transportation, *Intercity Bus Modernization: Creating Opportunities and Connecting Ontario Communities* (Government of Ontario, June 2016), online: http://www.mto.gov.on.ca/english/transit/pdfs/intercommunity-bus-proposal.pdf?fbclid=IwAR1F-IQYxurCmRPc9C4y_mQBAQK9x011XziSEmhFDW3aDJ68GYvonGebpXQ.

Principle: Students should be adequately consulted and included in the decision-making process when it comes to provincial transit issues.

Concern: Students do not have formal representation on any provincial transit boards, including Metrolinx and Ontario Northland.

Concern: Students are not routinely consulted on provincial transit issues or developments.

Recommendation: Metrolinx should strike a permanent advisory committee, comprised of student representatives from each region that is serviced, to advise on transit issues and infrastructure development that affects post-secondary students.

Recommendation: Ontario Northland should strike a permanent advisory committee, comprised of student representatives from each region that is serviced, to advise on transit issues and infrastructure development that affects post-secondary students.

Recommendation: Metrolinx should adopt one seat for student representation on their board of directors to address student concerns and opportunities for improved service between university transit hubs.

Recommendation: Ontario Northland should adopt one seat for northern student representation on their board of directors to address student concerns and opportunities for improved service to better connect northern students to their universities.

Metrolinx's current Board of Directors hosts a variety of distinguished professionals that represent many private and public sectors in Ontario.⁵³ However, the Board of Directors has no representation from the post-secondary education sector. OUSA strongly believes that in order for the post-secondary sector to be sufficiently represented, Metrolinx should add a seat on their Board specifically for post-secondary students.

The *Metrolinx Act* states that the Corporation's Board of Directors shall establish advisory committees, specifically naming students as those who are particularly affected by transportation in the regional transportation area.⁵⁴ However, the establishment of these advisory committees are not permanent, but struck on an as-needed basis. OUSA believes that the establishment of a permanent advisory committee, comprised of student representatives from each region that Metrolinx and Ontario Northland service, will secure strong student voices to effectively represent this population when it comes to matters regarding provincial transit. However, OUSA understands the limitations of advisory committees as they do not hold decision-making power.

Considering the fact that post-secondary education enrollment density is currently being used as an indicator to determine the advancement and prioritization of Metrolinx's Frequent Rapid Transit Network (FRTN),⁵⁵ it is critical that post-secondary students are not only included in the consultation process, but also included in decision-making positions.

The Ontario Northland Transit Commission also lacks student representation or representation from the post-secondary education sector.⁵⁶ A recent announcement from Ontario Northland outlined new regional stops and expanded bus service starting May 17, 2020. This expansion was designed to better connect

⁵³ "Board of Directors," *Metrolinx*, accessed September 29, 2020, online: http://www.metrolinx.com/en/aboutus/board/board_of_directors_bios.aspx.

⁵⁴ *Metrolinx Act*, 2006, S.O. 2006, c. 16.

⁵⁵ Mathieu Goetzke, *Advancing Transit Priorities: Frequent Rapid Transit Network Prioritization* (Metrolinx Board Of Directors Meeting, February 20, 2020), online: http://www.metrolinx.com/en/docs/pdf/board_agenda/20200220/20200220_BoardMtg_Advancing_Transit_Priorities.pdf.

⁵⁶ "Our Team," *Ontario Northland*, accessed September 29, 2020, online: <http://ontarionorthland.ca/en/our-team>.

Northern Ontario with direct stops at post-secondary institutions.⁵⁷ OUSA believes that student representation on the Ontario Northland Transit Commission is essential as the Ontario government works to expand service and connect students with their post-secondary institutions.

The designation of a student seat on both Metrolinx and Ontario Northland's Board of Directors will help to ensure that student concerns are adequately addressed and service improvements between university hubs are prioritized.

LOCAL TRANSIT

Principle: Students' ability to access their university campus through means of public transit is essential.

Principle: Students should have access to rapid, reliable and safe public transit services.

Concern: Local transit disruptions create barriers to accessing campus.

Concern: Lack of access to transportation in northern areas creates significant barriers for students to access their university campuses and other community resources.

Concern: Northern communities generally lack sufficient funds and resources to manage a transportation system.

Concern: Northern communities have smaller populations and insufficient ridership to justify a transportation system.

Concern: Some municipalities are insufficiently resourced to deliver rapid, reliable, and safe public transit options.

Concern: The "heads and beds" levy paid by the province to municipalities has remained stagnant for over three decades.

Recommendation: The Ministry of Colleges and Universities and the Ministry of Transportation should work with student groups to create a template for institutional responses to transit disruptions, including provisions for students who are affected, such as allowing students to attend classes remotely.

Recommendation: The Ministry of Transportation should prioritize northern municipalities when distributing funding through the Community Transportation Grant Program.

Recommendation: The provincial government should invest in rapid transit projects in municipalities with post-secondary institutions.

Recommendation: The provincial government should adjust the "heads and beds" levy in accordance with inflation to account for the additional wear and tear on local transit infrastructure.

Many students rely on local public transportation for mobility between their home and post-secondary institution. According to a 2019 study conducted by StudentMoveTO, post-secondary students have an average one-way commute distance of 14.6km and an average duration of 45.9 minutes.⁵⁸ The ability to make such a commute, however, is hindered when access to public transportation is unavailable or unreliable.

⁵⁷ "Ontario Fills Critical Transportation Gap in the Northwest," *Government of Ontario*, May 14, 2020, online: <https://news.ontario.ca/en/release/56947/ontario-fills-critical-transportation-gap-in-the-northwest>.

⁵⁸ Raktim Mitra, Khandker Nurul Habib, Matti Siemiatycki, Roger Keil and Jeremy Bowes, *From Insight to Action on Transportation for Post-Secondary Students in the GTHA 2019 Transportation Survey Findings* (StudentMoveTO, 2020), online: http://www.studentmoveto.ca/wp-content/uploads/2020/09/StudentMoveTO_2019_finalReport1.pdf.

In January 2020, thousands of students in Waterloo Region, including students from the University of Waterloo, Wilfrid Laurier University, and Conestoga College, experienced significant transportation disruptions as a result of the Grand River Transit (GRT) workers' strike action ceasing all bus services. The strike spanned 12 days beginning on January 21, 2020, and concluded with service resuming on February 1, 2020.⁵⁹ On an average weekday before the strike action occurred, 40,000 boardings across all GRT services were students from Conestoga College, University of Waterloo, and Wilfrid Laurier University.⁶⁰ Throughout the strike, many students cited significant disruptions and difficulty getting to campus. An estimated 17,000 students at the University of Waterloo were affected by the strike on a daily basis according to the Waterloo Undergraduate Student Association, and 30 to 40 percent of the Conestoga College student body had difficulty finding transportation to get to campus.⁶¹

Students require support and greater flexibility from their institutions during significant transit disruptions. Encouraging professors to post course content online, avoiding scheduling quizzes and tests during times of transit disruptions, and allowing students to attend classes remotely ensures that access to transit is not a barrier to accessing post-secondary. To ensure that institutions are prepared to support students during transit disruptions, the Ministry of Colleges and Universities and the Ministry of Transportation should collaborate with student groups to provide a template for institutional responses to transit strikes.

Studies have shown that the more often students attend class and access on-campus resources, the better their grades and the lower their dropout rates.⁶² The longer students spend commuting to their institution and on-campus resources, the less time they have to attend class or study, limiting academic potential.⁶³ This is a particular concern for students attending northern institutions who often face significant barriers to accessing campus and other community resources if they rely on public transportation. The primary barrier is a lack of public transportation options and, relatedly, the automobile-dominated culture of these communities.⁶⁴

While funding and operating a public transit system falls under municipal jurisdiction, a lack of sufficient funds at the municipal level makes it difficult for northern communities to provide this service. This is exacerbated by the fact that these communities have smaller populations and, as a result, insufficient ridership.⁶⁵ However, students and northern community members, particularly those from low-income groups, rely on public transportation for basic mobility, and to access employment and educational opportunities.⁶⁶

A lack of resources is a barrier for many municipalities to deliver rapid, reliable, and safe public transit options. This is a particular challenge for municipalities that are home to post-secondary institutions where populations fluctuate as students move back in the fall and leave in the summer, putting additional burdens on municipal services such as transportation systems. The "heads and beds levy" – the payment made by the provincial government to municipalities on behalf of post-secondary institutions and hospitals in lieu of taxes – is meant to alleviate this burden by providing the necessary funding to deliver services without unduly burdening city taxpayers. However, the current rate of \$75 per student or hospital bed has not been adjusted since 1987, making these payments insufficient to cover the costs of delivering municipal services. This is particularly true for local infrastructure and

⁵⁹ "GRT Strike Updates," *Wilfrid Laurier University Students' Union*, February 13, 2020, online: <https://yourstudentsunion.ca/grt-strike-on-tuesday-january-21-2020/>.

⁶⁰ Laura Booth, "Transit strike leaves students scrambling," January 23, 2020, online: <https://www.waterloochronicle.ca/news-story/9819154-transit-strike-leaves-students-scrambling/>.

⁶¹ Natalie van Rooy, "Thousands of students dealing with GRT strike as service disruption continues," *CTV News*, January 22, 2020, online: <https://kitchener.ctvnews.ca/thousands-of-students-dealing-with-grt-strike-as-service-disruption-continues-1.4779302>.

⁶² Jeff Allen and Steven Farber, "How time-use and transportation barriers limit on-campus participation of university students," *Travel Behaviour and Society* 13 (2018): 174-182, online: https://journals.github.io/docs/Allen_Farber_2018_TBS_student_participation.pdf.

⁶³ *Ibid.*

⁶⁴ "Public Transportation Not Just an Urban Concern," *Northern Policy Institute*, January 20, 2015, online: <https://www.northernpolicy.ca/article/public-transportation-not-just-an-urban-concern-293.asp>.

⁶⁵ *Ibid.*

⁶⁶ *Accelerating Rural Transportation Solutions Ten Community Case Studies from Ontario* (Rural Ontario Institute, October 2014), online: https://www.ruralontarioinstitute.ca/uploads/userfiles/files/ARTS_-_Case_Studies_for_WEB.pdf.

transit costs, as students increase ridership and ultimately add “wear and tear” that requires financial support. To address this concern, OUSA supports calls by municipalities for the provincial government to adjust the “heads and beds” levy in accordance with inflation to account for the additional wear and tear on local transit infrastructure.⁶⁷

In many municipalities, local transit can be improved through rapid transit systems which offer students and other community residents “a more efficient, reliable, comfortable, convenient, and effective way to travel.”⁶⁸ They offer “higher passenger capacity and faster speeds compared to conventional transit”⁶⁹ accommodating for larger populations that result from the presence of post-secondary students. Rapid transit systems, like that in Waterloo Region, allow students to more easily commute to campus and access services in their communities. Rapid transit is needed in municipalities with growing populations and where there is a need to support sustainable urban densification, both characteristics of municipalities with post-secondary institutions.⁷⁰ However, as illustrated above, municipalities require financial support from the province to make this a reality. OUSA therefore asks that the provincial government invest in rapid transit projects in municipalities with post-secondary institutions.

The provincial government has continually demonstrated their commitment to supporting local transit by significantly funding public transit infrastructure, such as the recent \$7.3B investment in public transit infrastructure through the Investing in Canada Infrastructure program.⁷¹ Additionally, the province’s Community Transportation Grant program provides municipalities with \$30 million over five years to support local and inter-community transit and bus service in areas that are currently underserved by public transit. OUSA believes that the Ministry of Transportation should continue to distribute funds through this program, targeting northern municipalities with post-secondary institutions, to better serve students in the area and increase access to post-secondary institutions.

IMPROVING ACTIVE TRANSIT

Principle: Active transit options provide healthy, environmentally friendly alternatives for commuting students.

Principle: Students should have access to safe, alternative methods of transportation.

Principle: Active transit has community and environmental benefits.

Principle: Pedestrian safety should be prioritized when implementing new strategies for active transit.

Principle: Students’ ability to access and utilize transit hubs is essential to connect students between their university and home.

Concern: Lack of active transit infrastructure decreases student mobility, creating barriers for students trying to access their schools, jobs, and other facilities within the community.

⁶⁷ *Compendium of Policy Resolutions, 2020-2023* (Ontario Chamber of Commerce, 2020), 59, online: <https://occ.ca/wp-content/uploads/Compendium-of-Policy-Resolutions-2020-2023.pdf>.

⁶⁸ “About the Project,” *Rapid Transit: Region of Waterloo*, accessed December 1, 2020, online: <https://rapidtransit.regionofwaterloo.ca/en/aboutus/abouttheproject.asp>.

⁶⁹ Lindsay Wiginton, *Getting on Board: Learning from planning and engagement around rapid transit projects in Ontario* (Pembina Institute, March 2017), online: <https://www.pembina.org/reports/getting-on-board.pdf>.

⁷⁰ University Relations, “All aboard! Waterloo welcomes light rail transit,” *University of Waterloo Magazine*, Spring 2019, online: <https://uwaterloo.ca/magazine/spring-2019/talk-campus/all-aboard-waterloo-welcomes-light-rail-transit>.

⁷¹ “Canada and Ontario invest in sustainable public transit and active transportation infrastructure for Kingston residents,” *Government of Canada (news release)*, August 10, 2020, online: <https://www.canada.ca/en/office-infrastructure/news/2020/08/canada-and-ontario-invest-in-sustainable-public-transit-and-active-transportation-infrastructure-for-kingston-residents.html>.

Concern: Municipalities do not always have the financial capability to invest in active transit infrastructure.

Concern: Municipalities are legally required to run balanced budgets per the Municipal Act, which prevents municipalities from running deficits, eliminating an important tool for financing infrastructure projects

Concern: The majority of transit hubs are difficult to access by alternative modes of transit other than by car.

Recommendation: The provincial government should expand the Ontario Community Transportation Grant Program and prioritize municipalities with post-secondary institutions and active transportation or 'Complete Streets' plans within its eligibility criteria.

Recommendation: The provincial government should provide envelope funding to municipalities who wish to implement innovative active transit pilot programs.

Recommendation: The provincial government should implement First and Last Mile planning in all existing and future transit hub developments to ensure that students can access transit without driving.

Active transportation serves as an alternative to car trips and provides both community and environmental benefits as more people utilize improved pedestrian sidewalks and cycling infrastructure. It is defined as any form of human-powered transportation; primarily walking and biking, that is often combined with other modes of transportation, such as public transportation.⁷² Additional benefits of active transportation include a reduction in greenhouse gas emissions and a reduction in overall traffic congestion. However, for active transit to be effective, it must be both accessible and safe.

When surveyed by StudentMoveTO, many students responded that student safety was a challenge while walking or cycling on busy urban and suburban roads.⁷³ Addressing student safety would help to reduce barriers to active transit use. One approach is the concept of 'Complete Streets'; streets that are safe for everyone including pedestrians, cyclists, cars, and public transit users. Complete Streets policies have grown in popularity throughout Canada and have passed in many Ontario municipalities, including Waterloo, Greater Sudbury, Toronto, Ajax, and Ottawa.⁷⁴ The concept of Complete Streets enables the prioritization of active transit, while also supporting mobility for those who may require or who choose to travel by car or public transit.

The effective integration of active transit and public transit requires a coordinated effort from the community, municipal government, and the provincial government.⁷⁵ In order to best implement a Complete Streets approach, improvements to active transportation and public transit must happen simultaneously. In other words, streets need to be reconfigured to prioritize public transit and also plan for active transportation infrastructure at every opportunity.⁷⁶ However, many municipalities are under extreme financial pressure as by law, municipalities are not entitled to run deficits. Municipalities are also facing significant fiscal challenges due to the COVID-19 pandemic. In April 2020, the Federation of Canadian Municipalities (FCM) collected data showing that Canadian municipalities face a minimum of \$10-15 billion in near-term, non-recoverable losses due to COVID-19, with an estimated \$400 million

⁷² "Active Transportation," *Middlesex-London Health Unit*, accessed September 29, 2020, online: <https://www.healthunit.com/active-transportation>.

⁷³ Raktim Mitra, Khandker Nurul Habib, Matti Siemiatycki, Roger Keil and Jeremy Bowes, *From Insight to Action on Transportation for Post-Secondary Students in the GTHA 2019 Transportation Survey Findings* (StudentMoveTO, 2020), online: http://www.studentmoveto.ca/wp-content/uploads/2020/09/StudentMoveTO_2019_finalReport1.pdf, 1.

⁷⁴ "What are Complete Streets?," *Complete Streets for Canada*, accessed September 29, 2020, online: <https://www.completestreetsforcanada.ca/what-are-complete-streets/>.

⁷⁵ Alex Gatien and Aida Mas Bagahe, *Improving Active Transportation and Public Transit Integration: A Guidebook for Policy and Planning* (The Centre for Active Transportation at Clean Air Partnership, 2019), online: <https://www.tcat.ca/wp-content/uploads/2019/06/Active-Transportation-and-Public-Transit-Integration-web-3.pdf>, 7.

⁷⁶ *Ibid*, 11.

each month from lost transit ridership alone.⁷⁷ As municipalities work to recover and rebuild their losses, the prioritization of active transit and better integration of Complete Streets approaches cannot be sidelined. This is why OUSA is advocating for the expansion of the Ontario Community Transportation Grant Program to include specific parameters to prioritize municipalities with post-secondary institutions and active transportation plans within its eligibility criteria. Though the current program coordinates transportation services to run intercommunity routes and expand local services,⁷⁸ OUSA believes that there is significant opportunity to expand such grant funding to include models of community transportation systems that support active modes of transportation.

In order to support new methods of active transportation, the Ontario government should also provide envelope funding to municipalities to implement and experiment with innovative active transit pilot programs. The City of Waterloo was the first Canadian city to host a pilot program for Lime e-scooters between October and November 2018 and May and August 2019.⁷⁹ These e-scooters provided micro-mobility options for students and the community as a more sustainable means of transit. Not only did this pilot program support new and emerging trends in active transit, it also served as a means to study how e-scooters could be incorporated into the *Ontario Highway Traffic Act*. Previously, the *Ontario Highway Traffic Act* imposed limitations on the use of e-scooters. However, on January 1, 2020, the Ontario government allowed municipalities to permit e-scooters on Ontario roads as part of a 5-year pilot program, citing the government's commitment to "supporting new and emerging technologies that move people safely and efficiently while limiting environmental impacts."⁸⁰ The Waterloo Lime e-scooter pilot serves as an innovative example to not only introduce a new form of transportation that reduces traffic congestion and supports First Mile-Last Mile (FMLM) planning, but also showcases the impact that pilot programs have on future provincial legislation to support active transportation programs.

Finally, as "every trip begins and ends with active transportation",⁸¹ it is also imperative that FMLM is integrated in the planning process for major transit hubs. FMLM "describes the challenge of getting people to and from transit stations, mobility hubs, and fixed-route transit serves to and from their home or workplace without the use of a private automobile."⁸² Whether students commute to their post-secondary institution, or move to a new community to attend an institution, inter-regional transit is critical as it connects students between their homes and campus. Students who do not commute regularly still depend on inter-regional transit to return to their family homes in a convenient and low-cost manner for weekend travel, reading week, and other holidays. However, inter-regional transportation hubs are often difficult for students to access. Metrolinx reports that 60 percent of GO users drive to access GO bus or train stations.⁸³ In an effort to integrate more sustainable ways of travel and promote active transportation, the provincial government should address FMLM considerations in transportation hub planning by making walking, micro-transit, cycling, carpooling, and connecting with public transit more accessible means of connecting to transit hubs.

⁷⁷ "COVID-19: Municipalities seek emergency funding," *Federation of Canadian Municipalities*, April 23, 2020, online: <https://fcm.ca/en/news-media/news-release/covid-19-municipalities-seek-emergency-funding>.

⁷⁸ "Ontario Helping Communities Across the Province Improve Transit," *Government of Ontario*, January 25, 2019, online: <https://news.ontario.ca/en/release/51050/ontario-helping-communities-across-the-province-improve-transit>.

⁷⁹ Namish Modi, "Lime e-scooters wheeling out of Waterloo on Aug. 12," *Waterloo Chronicle*, August 7, 2019, online: <https://www.waterloochronicle.ca/news-story/9538935-lime-e-scooters-wheeling-out-of-waterloo-on-aug-12/>.

⁸⁰ "Electric Kick-Style Scooters (e-scooters)," *Ministry of Transportation*, accessed September 29, 2020, online: <http://www.mto.gov.on.ca/english/vehicles/electric/electric-scooters.shtml>.

⁸¹ *Healthy Communities and Planning for Active Transportation Planning and Implementing Active Transportation in Ontario Communities: A Call to Action* (Ontario Professional Planners Institute, June 21, 2012), online: <https://ontarioplanners.ca/OPPIAssets/Documents/Calls-to-Action/Planning-and-Implementing-Active-Transportation-in-Ontario-Communities-June-21.pdf>.

⁸² "Glossary," *Metrolinx Engage*, accessed September 29, 2020, online: <https://www.metrolinxengage.com/en/content/glossary#FMLM>.

⁸³ "First and Last Mile," *Metrolinx Engage*, accessed September 29, 2020, online: <https://www.metrolinxengage.com/en/content/first-and-last-mile>.

Principle: Both local and inter-regional transit should be physically accessible to all students, including those with mobility concerns, audio/visual impairments, and other related disabilities.

Principle: Both local and inter-regional transit should be financially accessible for all students, regardless of their financial position.

Concern: There are both physical and financial barriers to local and inter-regional transit for students with mobility concerns, audio/visual impairments, and other related disabilities.

Concern: Although some post-secondary institutions have transit deals in place to alleviate the cost of transportation, local and inter-regional transit costs can remain prohibitively expensive for many students.

Recommendation: The Ministry of Community and Social Services should expand the Ontario Disability Support Program to provide reduced-cost inter-regional transit services for persons with disabilities.

Recommendation: The Ministry of Transportation should provide funding to Metrolinx, Ontario Northland, and other local transit authorities to offer stronger discounted student pricing.

Recommendation: The Ministry of Transportation should work with students and others in the disability community to identify and respond to gaps in Part V: Transportation Standards in Ontario Regulation 191/11 of the *Accessibility for Ontarians with Disabilities Act* that fail to address the needs of students with disabilities accessing public transit.

OUSA believes that transportation is an essential service for all students, and access to this service should not be contingent on one's mobility and/or income. However, students with physical disabilities often face barriers when accessing public transit. Physical and financial barriers exist at the outset for students with mobility concerns, audio/visual impairments, and other related disabilities. Although many municipalities have committed to making public transportation more accessible and tailor their services to the specific needs of those with mobility concerns, problems still arise. For example, many bus stops do not have enough room to accommodate wheelchairs and go against the mandated two-metre width stipulated by provincial accessibility laws.⁸⁴ Additionally, priority seating guidelines are often not adhered to, creating a barrier for students and other transit riders who require access to this designated seating area in order to safely utilize public transit.⁸⁵ Even when all accessibility measures are in place and committed to, concerns are nevertheless present. For instance, the TTC committed to full accessibility for all subway stations by 2025, but in 2016 revamped their plan, leaving 17 stations without appropriate measures for persons with mobility issues.⁸⁶

The *Accessibility for Ontarians with Disabilities Act* sets standards for accessible transportation in Ontario Regulation 191/11, Part V: Transportation Standards. However, while these standards have generally improved access to transit for persons with disabilities, there continue to be barriers to accessing transit for persons with disabilities.⁸⁷ If all students are to have equitable access to their post-secondary institutions and communities, it is essential that these barriers are addressed. To that end, the Ministry of Transportation should work with students and others in the disability community to identify and respond to gaps in Part V: Transportation Standards in Ontario Regulation 191/11 that fail to address the needs of students with disabilities accessing public transit.

⁸⁴ Bucky, "Challenges and triumphs of accessible transportation," *Rick Hansen Foundation Blog*, January 5, 2015, online: <https://www.rickhansen.com/news-stories/blog/challenges-and-triumphs-accessible-transportation>.

⁸⁵ David C. Onley, *Third Legislative Review of the Accessibility for Ontarians with Disabilities Act, 2005* (January 2019), online: <https://www.ontario.ca/page/2019-legislative-review-accessibility-ontarians-disabilities-act-2005>.

⁸⁶ "Accessible Transit – A Daily Struggle with Accessibility Issues on the TTC," *Disability Credit Canada*, November 25, 2016, online: <https://disabilitycreditcanada.com/accessible-transit/>.

⁸⁷ Onley, *Third Legislative Review of the AODA*.

Students in lower income brackets also experience hindrances when dealing with public transportation. This is particularly concerning as public transportation offers the most affordable or cost-effective option for many students and it should therefore be financially accessible for all students. However, according to the Ministry of Transportation, high ticket prices are deterrents for travelling on intercity buses for many students, especially those situated in remote and rural areas.⁸⁸ Even for those in urban areas, public transportation can become prohibitively expensive. The TTC is one of the world’s most expensive public transit systems; Toronto residents who, on average, net \$3,532 a month, still need to spend 4.2% of their salary on a monthly TTC pass.⁸⁹ Although many institutions strike deals with municipal transit authorities enabling students to enjoy subsidized transit rates, costs are still expensive.

To address these financial barriers, OUSA recommends that the Ministry of Community and Social Services expand the Ontario Disability Support Program to provide reduced-cost inter-regional transit services for persons with disabilities. The Ministry of Community and Social Services currently offers subsidies through the Ontario Disability Support Program (ODSP) for limited transit options. Although funding is available for local transit options within a region, there are no subsidies for transit between regions. The Ministry of Community and Social Services should provide additional transportation funding to persons with mobility concerns in order to support accessible inter-regional transit. Additionally, OUSA calls on the Ministry of Transportation to provide funding to Metrolinx, Ontario Northland, and other local transit authorities for the purpose of offering stronger student discount grants that can be offered on a per-need basis. These subsidies and grants will help students who need additional financial support to access public transportation.

COMMUNITY DEVELOPMENT

MUNICIPAL BYLAWS

Principle: Students deserve to be treated fairly under the Ontario municipal bylaws.

Principle: Bylaw enforcement should fairly impact all residents of a municipality.

Principle: Students should enjoy the same rights and privileges as any member of a municipality.

Concern: Students' ability to enjoy their community is challenged by discriminatory bylaw enforcement.

Concern: Students face targeted bylaw regulation that other community members do not.

Recommendation: The Ministry of Municipal Affairs and Housing should develop accountability measures in consultation with student representatives and the Ontario Human Rights Commission to ensure municipalities do not create by laws that discriminate against students in practice.

Recommendation: The Ministry of the Attorney General should issue a statement—for the courts to adhere to—that recognizes student status as a proxy for age, marital status, or recipient of public assistance in order to grant better protection under the *Ontario Human Rights Code*.

Recommendation: The Ministry of Municipal Affairs and Housing should review the developed accountability measures in consultation with the Ontario Human Rights Commission.

Municipal bylaws are an important facet of Canadian democracy, ensuring that rules and regulations can be specific to individual communities and address the direct needs of Canadian cities. However,

⁸⁸ *Intercity Bus Modernization: Creating Opportunities and Connecting Ontario Communities* (Ministry of Transportation, June 2016), online: <http://www.mto.gov.on.ca/english/transit/pdfs/intercommunity-bus-proposal.pdf>.

⁸⁹ “TTC Ranked One of the Most Expensive Public Transit Systems in the World,” *Toronto Storeys*, August 7, 2020, online: <https://torontostoreys.com/toronto-ttc-expensive-public-transit-systems-world/>.

sometimes these bylaws unfairly target students. Students have a reasonable right of enjoyment within their municipalities just as any other resident, yet this is not always the case. Though bylaws may be created with good intentions, students and student associations have noted that bylaws can be over-enforced on student neighbourhoods – having a negative impact on those who pay the fines and the communities they live in.

Examples of students being over-regulated in their communities are common. Specifically, students are often disproportionately regulated and policed in their neighbourhoods. The London Police Services (LPS) have a yearly program called ‘LEARN’ that the agency uses to crack down on students when they return to the city in September.⁹⁰ LEARN entails the LPS heavily monitoring student neighbourhoods during the beginning of each school year to distribute fines.⁹¹ These fines are often given out without warning, not giving students a chance to become educated about the bylaws in their new communities in order to comply, a leisure that other cohorts of London are afforded. Students often face additional barriers or bylaw regulations that other community members do not. For example, London’s Nuisance Party Bylaw was enacted specifically to curb student parties, giving the municipality a way to fine students for having ‘unsanctioned parties’.⁹² While no Western University students have been fined under this bylaw to date, it is often used as a threat by the City to disincentive student partying. Similar issues have also popped up at Queen’s University in Kingston.⁹³

The *Ontario Human Rights Code (Code)* protects against this type of discriminatory bylaw and requires a municipality “to show that the absence or variation of the bylaw would cause them “undue hardship” in terms of health and safety or cost ramifications.”⁹⁴ This provides a level of protection or recourse for those discriminated against by municipal bylaws so long as the person or groups of people targeted or impacted fall within a *Code*-protected groups. However, student status is not a *Code*-protected ground which limits their protections from discriminatory bylaws and bylaw enforcement. The Ontario Human Rights Commission (OHRC) explored this gap in the context of rental housing licensing, arguing that student status could be a proxy for a number of *Code*-protected grounds, including age, single status, and receipt of public assistance. The OHRC suggests that “[i]f student status is a proxy for age, marital status or receipt of public assistance, elements of the bylaw that disadvantage students because of their student status will be discriminatory and contrary to the *Code*.” If this were applied in the context of municipal bylaws, students would have better protections under the *Code* as municipal bylaws and bylaw enforcement would have to adhere to requirements under the *Code*. Therefore, to ensure that students are not discriminated against, the Ministry of the Attorney General should issue a statement—for the courts to adhere to—that recognizes student status as a proxy for age, marital status, or recipient of public assistance.

To mitigate instances of students being harshly penalized under municipal bylaws like these in London and in other municipalities with post-secondary institutions, the Ministry of Municipal Affairs and Housing should develop accountability measures in consultation with student representatives and the Ontario Human Rights Commission to ensure municipalities remain in compliance with the Ontario Human Rights Code and the *Municipal Act, 2001*. Additionally, the Ministry of Municipal Affairs and Housing should regularly review the developed accountability measures in consultation with the Ontario Human Rights Commission. This will protect students from undue regulation in their communities and offer them the same protections afforded to other municipal residents.

⁹⁰ Sawyer Bogdan, “London police launch Project LEARN as post-secondary students return,” *Global News*, September 4, 2020, online: <https://globalnews.ca/news/7316999/london-police-launch-project-learn/>.

⁹¹ *Ibid.*

⁹² Megan Stacey, “Returning students to be met with new nuisance party bylaw,” *The London Free Press*, August 28, 2019, online: <https://lfpres.com/news/local-news/returning-students-to-be-met-with-new-nuisance-party-bylaw>.

⁹³ “University District Safety Initiative,” *City of Kingston*, accessed September 29, 2020, online: <https://www.cityofkingston.ca/city-hall/bylaws/nuisance-party-bylaw/university-district>.

⁹⁴ *Room for everyone: Human rights and rental housing licensing* (Ontario Human Rights Commission, 2013), 5-8, online: <http://www.ohrc.on.ca/en/room-everyone-human-rights-and-rental-housing-licensing>.

Principle: Near-campus neighbourhoods should be consciously planned and developed, with the aim of better integrating post-secondary students within their respective communities.

Principle: Post-secondary students should be consulted in the planning and development of near-campus neighbourhoods.

Principle: Housing supply should meet demand in student communities.

Concern: The Ministry of Municipal Affairs and Housing's Provincial Policy Statement does not address near-campus neighbourhood development, increasing and improving green spaces, or mixed-use zoning.

Concern: The supply of housing does not increase at the same rate as populations in student communities, creating a lack of housing density.

Recommendation: The Ministry of Municipal Affairs and Housing should add a section to the Provincial Policy Statement that discusses the benefits of green spaces within near-campus neighbourhoods.

Recommendation: The Ministry of Municipal Affairs and Housing should add a section to the Provincial Policy Statement that discusses development guidelines, specifically by addressing the merits of mixed-use zoning for near-campus neighbourhoods.

Recommendation: The Ministry of Municipal Affairs and Housing should add a section to the Provincial Policy Statement that addresses the merits of intensifying housing stock through upzoning if required in near-campus neighbourhoods.

According to both Ian Bird (President of Community Foundations Canada) and Paul Davison (President and CEO of Universities Canada), "in an age of disruption, community-university collaboration is a must".⁹⁵ As such, it is more important than ever that near-campus neighbourhoods be planned and developed in ways that integrate students within their respective communities. Fostering a sense of community helps students reach their full potential: in a study of 39 adult students enrolled in a management degree completion program, the creation of a sense of community was a significant factor in helping these students realize their respective goals.⁹⁶

The quality of housing and community life have historically been allowed to decay in near-campus neighbourhoods.⁹⁷ While municipalities play an important role in this, there is a clear need for guidance from the province. In order to address issues related to near-campus neighbourhoods, the Ministry of Municipal Affairs and Housing should publish a revised Provincial Policy Statement (PPS) that specifically and comprehensively addresses near-campus neighbourhood development, increasing and improving green spaces, and mixed-use and upzoning.

The PPS is a tool that could be used to address these concerns systematically, both as a general guiding document and a binding policy directive under section 3 of the *Planning Act*. The PPS sets "the policy foundation for regulating the development and use of land" and "supports the provincial goal to enhance the quality of life for all Ontarians".⁹⁸ The PPS proposes ways in which municipalities can engage in appropriate development, specifically focusing on areas related to "building strong healthy communities",

⁹⁵ Ian Bird and Paul Davison, "In an age of disruption, community-university collaboration is a must," *Universities Canada*, May 30, 2018, online: <https://www.univcan.ca/media-room/media-releases/in-an-age-of-disruption-community-university-collaboration-is-a-must/>.

⁹⁶ Breck A. Harris, "The Importance of Creating a "Sense of Community",” *Journal of College Student Retention: Research, Theory & Practice*, May 1, 2006, online: <https://journals.sagepub.com/doi/abs/10.2190/AMNM-2VKP-V6MH-D1GF?journalCode=csra>.

⁹⁷ See concerns in "Ensuring Quality and Affordable Housing".

⁹⁸ *Provincial Policy Statement, 2020: Under the Planning Act* (Approved by the Lieutenant Governor in Council, Order in Council No. 229/2020, Queen's Printer for Ontario, 2020), online: <https://files.ontario.ca/mmah-provincial-policy-statement-2020-accessible-final-en-2020-02-14.pdf>.

“wise use and management of resources”, and “protecting public health and safety”.⁹⁹ However, the PPS does not discuss near-campus neighbourhoods and their associated benefits. Additionally, although the PPS mentions green spaces and mixed-use zoning, it does not fully address these topics in the detail sufficient to encourage changes.

Sections designated specifically to near-campus neighbourhoods, green spaces, and mixed-use zoning in the PPS would help to ensure positive development of neighbourhoods. Some topics that could be addressed in these sections include university development with respect to the surrounding community, active transit routes for students, the creation of more inclusive amenities, and the merits of intensifying housing stock through upzoning if required in near-campus neighbourhoods. Addressing these key areas comprehensively would offer guidance to municipalities as they seek to build health, safe, and liveable cities.

SAFETY & BELONGING

Principle: Students should be aware of any personal information that government services and post-secondary institutions have access to.

Principle: Crime prevention mechanisms should be tailored to the needs of the municipalities.

Principle: Community development and crime prevention should be evidence informed.

Principle: Students should have the ability to engage in meaningful experiential learning opportunities within their respective municipalities.

Concern: Students are not always aware of when and what personal information is being shared outside of their post-secondary institution.

Concern: Crime in near-campus neighbourhoods has been increasing in recent years.

Concern: Students often feel disengaged from their municipalities.

Concern: Evidence-informed strategies are not always used in community development and crime prevention.

Recommendation: The Ministry of Colleges and Universities should mandate that students be made aware of all memorandum of understanding agreements between government services and post-secondary institutions that deal with student information.

Recommendation: The Ministry of the Solicitor General and the Ministry of Municipal Affairs and Housing should develop provincial crime prevention and community safety policies that prioritize the voices of a diverse array of community members so that programs can be adapted based on the needs of those community members.

Recommendation: The provincial government should fund development and analysis to assist municipalities in effectively collecting and using data in an ethical and transparent manner to understand local issues including but not limited to, crime, safety, gender-based violence.

Recommendation: The provincial government should provide envelope funding for workshops and conferences between municipalities and universities aimed at developing and improving partnerships, public engagement and student engagement in crime prevention activities.¹⁰⁰

⁹⁹ Ibid.

Recommendation: The provincial government should provide investments in local work-integrated learning opportunities with a focus on community-building and partnerships between the municipality and students.

Recommendation: The Ministry of Colleges and Universities should mandate that each post-secondary institution publicly release a standardized yearly public report indicating all allocations of the Campus Safety Grant.

Recommendation: The provincial government should partner with the United Nations Safe Cities Initiative to collect data and create informed strategies to protect Canadians in their municipalities and work with student associations to create informed strategies to protect students in their municipalities.

Information sharing and big data are prevalent in our culture and protection of security and privacy have therefore become increasingly important. Student security and privacy should be no exception. However, this is not always the case. For example, in 2019, Western University and the London Police Service signed a memorandum of understanding (MOU), enabling the university to solicit information from the police department regarding the criminal backgrounds of students. According to the MOU, London police are authorized to “share the names of Western students over the age of 18 facing serious charges or convictions with school officials so they can launch a student code-of-conduct investigation”.¹⁰¹ Information exchange designated by the MOU would include assault, sexual assault, damage or destruction of property, trafficking narcotics, providing alcohol to minors, dangerous activities on rooftops, and other charges where the student exposed or caused serious harm to others or property.¹⁰² Earlier in the year, Western University expanded their code-of-conduct to include academic discipline, including expulsion for bad behaviour both on and off campus.¹⁰³

The MOU established between Western University and the London Police Service sets a dangerous precedent for sharing confidential student information. As opposed to going through a formalized court system, the MOU allows an institution to receive private information behind closed doors and without the student’s knowledge. A student not knowing who has access to their personal information raises serious concerns about privacy and security, particularly when that information is used to enforce codes-of-conduct that can have implications for a student’s academic career. Any personal information that government services and post-secondary institutions have access to or share between themselves should always be known to the student. As such, OUSA calls on the Ministry of Colleges and Universities to mandate that students be informed of all MOUs between government services and post-secondary institutions that deal with student information. OUSA also recommends, on a more institutional level, that student associations be included on any discussions when MOUs are being considered, discussed, and/or amended.

Crime has always been an important student-facing issue. According to a study conducted at the University of Waterloo, increased crime rates are associated with near-campus locations.¹⁰⁴ Therefore, it is important that crime prevention mechanisms be tailored to the needs of respective municipalities. General approaches cannot adequately address community-specific concerns and nuances.

OUSA supports the municipal crime prevention recommendations put forward by the Canadian Municipal Network on Crime Prevention,¹⁰⁵ and proposes student tailored recommendations that build on the work of this network. Specifically, OUSA recommends that the Ministry of the Solicitor General and the Ministry of Municipal Affairs and Housing develop provincial crime prevention and community

¹⁰¹ Heather Rivers, “Western student council slams school’s info-sharing agreement with cops,” *The London Free Press*, September 27, 2019, online: <https://lfpres.com/news/local-news/western-student-council-slams-schools-info-sharing-agreement-with-cops>.

¹⁰² Ibid.

¹⁰³ Ibid.

¹⁰⁴ Xue Luo, “Spatial Patterns of Neighbourhood Crime in Canadian Cities: The Influence of Neighbourhood and City Contexts,” M.Sc. thesis (University of Waterloo, 2012), online: https://uwspace.uwaterloo.ca/bitstream/handle/10012/6489/Luo_Xue.pdf;jsessionid=433CC3D7E6434881EF2115A003EF7B89?sequence=1, 56.

¹⁰⁵ “Municipal Crime Prevention,” *Canadian Municipal Network on Crime Prevention*, accessed September 29, 2020, online: <http://safercities.ca/municipal-crime-prevention/>.

safety policies that prioritize the voices of a diverse array of community members so that programs can be adapted based on the needs of those community members; and that the provincial government funds development and analysis at universities to assist municipalities in effectively collecting and using data in an ethical and transparent manner to understand local issues including but not limited to, crime, safety, gender-based violence. This money should be allocated to the local city council so that committees with diverse municipal stakeholders can be created to effectively address the issues. Importantly, this money should not be used to increase local police budgets, but instead explore “strategies that go beyond the established reactive police and criminal justice activities” and prioritize diverse voices to implement “preventative measures that can tackle the causes of crime through stronger actions and innovations in sectors such as schools, housing, social and youth services, [and] health”.¹⁰⁶

According to the United Nations, “to tackle crime effectively, communities need to be consulted on the problems they face and how to tackle them”.¹⁰⁷ Governments have realized the importance of active engagement; many governments are “partnering with communities and civil society organizations to prevent crime and violence because of their knowledge of local problems and capacity to reach out to vulnerable, at-risk segments of society”.¹⁰⁸ Using this form of collaboration that engages the community, including students, to create evidence-based solutions is paramount. However, fewer than one-third of Ontario university students feel that the city where their university is located actively engages post-secondary students in municipal issues.¹⁰⁹ To meaningfully address concerns around public safety and enhance community engagement, OUSA recommends that the provincial government partner with leading civil society organizations like the United Nations Safe Cities Initiative to collect data and work with student associations to create informed strategies to protect citizens in their municipalities. Bringing civil society organizations together with student associations will allow for meaningful and productive relationships that will foster more effective and inclusive crime prevention strategies.

The UN Safe Cities initiative highlights the need for evidence-informed and publicly-accessible crime prevention data. This data is necessary to understand the problem and to effectively support investments in prevention efforts. For example, in 2018, the Student Voices on Sexual Violence survey collected quantitative data from 160,000 students across Ontario’s post-secondary campuses on gender-based violence.¹¹⁰ The data reaffirmed that students are facing a crisis of gender-based violence on post-secondary campuses and led to increased investments in the Campus Safety Grant (CSG), established by the Ministry of Colleges and Universities in 1991 to support post-secondary institutions to combat gender-based violence. Recipients of the CSG are required to report the initiatives or programs undertaken by the institution to the Ministry. However, this information is not always publicly available, creating a lost opportunity for transparency and information and best practice sharing between institutions. To increase transparency, the Ministry of Colleges and Universities should mandate that each post-secondary institution submit an annual standardized public report indicating all allocations of the CSG. This increased transparency will ensure that institutions are accountable with their CSG allocations. It will also allow institutions to learn from the work being done at other institutions.¹¹¹

Another barrier to student safety and belonging in their communities is the serious disconnect between students and their municipalities. Students’ engagement in politics and municipal affairs can be difficult,¹¹² and many students report feeling disconnected to their communities beyond their campuses. This disconnect can cause issues within municipalities. When students are seen as four-year tourists and

¹⁰⁶ “Home,” *Canadian Municipal Network on Crime Prevention*, accessed September 29, 2020, online: <http://safercities.ca/home>.

¹⁰⁷ *The Role Of The Public In Strengthening Crime Prevention And Criminal Justice* (13th United Nations Congress On Crime Prevention And Criminal Justice Doha, 12 –19 April 2015), online: https://www.un.org/en/events/crimecongress2015/pdf/Factsheet_6_Public_participation_EN.pdf.

¹⁰⁸ Ibid.

¹⁰⁹ Eddy Avila, Britney De Costa, and Ryan Tishcoff, *Quality: Results from the 2017 Ontario Post-Secondary Student Survey* (Toronto: Ontario Undergraduate Student Alliance, 2019), online: https://www.ousa.ca/reports_opsss_2017_quality.

¹¹⁰ “Ontario Government Takes Action to Protect Students From Sexual Violence,” *Government of Ontario*, March 19, 2019, online: <https://news.ontario.ca/en/release/51595/ontario-government-takes-action-to-protect-students-from-sexual-violence>.

¹¹¹ Additional amendments and investments are needed to enhance the Campus Safety Grant’s effectiveness. See OUSA’s policy paper, *Gender-based and Sexual Violence Prevention and Response* for further recommendations.

¹¹² Martin P. Wattenberg, *Is voting for young people?* (New York, NY: Pearson Longman, 2016).

consider their time at university as temporary, relationships between residents and students can become strained. There are missed opportunities for community development for both parties.

Work-integrated learning (WIL) offers a mutually-beneficial opportunity to address this disconnect. Integrating work and community involvement into programs and courses allows students to gain relevant work experience while also strengthening their connections with the community in their university town. Examples of municipally-focused WIL opportunities already exist in many municipalities. For example, in 2016, Wilfrid Laurier University launched the City Studio program to strengthen student-community connections.¹¹³ This innovative community program allows students, city staff, and community stakeholders to discuss and create ideas and solutions to challenges found in their community. By tackling long-established community issues with the fresh perspective of students and the expertise of community members and city staffers, both parties' benefit. The local city benefits from the minds their university attracts and students create connections to the city where they are living. City Studio programs have also been launched in London, Brantford, and Durham Region.¹¹⁴ However, there is opportunity for more programs like this. For this reason, the provincial government should provide investments in local WIL opportunities with a focus on community-building and partnerships between the municipality and students.

To further collaboration between students and their municipalities, the provincial government should fund workshops and conferences at the local level aimed at developing and improving partnerships, public engagement and student engagement in crime prevention activities.¹¹⁵ Including these initiatives in university courses is also a great way to ensure that students learn about their community and get the most out of the conferences. This is a way for students to create connections with the community beyond their university campus and for their communities to see the true value of nurturing young minds.

¹¹³ "City of Waterloo and Laurier to launch innovative CityStudio project," *Laurier*, November 3, 2016, online: <https://www.wlu.ca/news/news-releases/2016/nov/city-of-waterloo-and-laurier-to-launch-innovative-citystudio-project.html>.

¹¹⁴ "Cities Around the World," *City Studio Vancouver*, accessed September 29, 2020, online: <https://citystudiovancouver.com/cities-around-the-world/>; "10th Canadian CityStudio to launch in Durham Region, Ontario," September 24, 2020, online: <https://citystudiovancouver.com/blog/10th-canadian-citystudio-to-launch-in-durham-region-ontario/>.

¹¹⁵ "Municipal Crime Prevention," *Canadian Municipal Network on Crime Prevention*.

POLICY STATEMENT

Whereas: All student tenants should have access to safe, quality, and affordable housing within a reasonable distance from their respective post-secondary institution.

Whereas: Landlords are responsible for providing and maintaining a residential complex, including the rental units in it, in a good state of repair and fit for habitation and for complying with health, safety, housing and maintenance standards.

Whereas: Students should pay fair market-value for their accommodations.

Whereas: All student tenants must be able to easily access and understand their rights and responsibilities as renters.

Whereas: All rental units should be maintained in a good state or repair.

Whereas: Everyone has the right to equal treatment in housing without discrimination and harassment.

Whereas: Landlords and tenants deserve access to public and accurate information about prospective tenancies.

Whereas: All student tenants should be fully protected under the *Residential Tenancies Act*.

Whereas: All student boarders should be protected under the *Ontario Human Rights Code*.

Whereas: All student tenants should have access to fair and timely dispute resolution when landlords are not meeting their legal obligations.

Whereas: Transparency and access to information are crucial to ensuring the legitimacy and integrity of tribunals.

Whereas: Inter-regional transit is essential for students who commute from or reside in different areas than their post-secondary institution.

Whereas: Inter-regional transit should provide consistent and reliable access to a student's post-secondary institution.

Whereas: Lack of consistent and reliable inter-regional transit should not be a barrier for students to attend the institution of their choice.

Whereas: Both private and public providers have a role to play in building stronger inter-regional transportation networks in Ontario.

Whereas: Students should be adequately consulted and included in the decision-making process when it comes to provincial transit issues.

Whereas: Students' ability to access their university campus through means of public transit is essential.

Whereas: Students should have access to rapid, reliable and safe public transit services.

Whereas: Active transit options provide healthy, environmentally friendly alternatives for commuting students.

Whereas: Students should have access to safe, alternative methods of transportation.

Whereas: Active transit has community and environmental benefits.

Whereas: Pedestrian safety should be prioritized when implementing new strategies for active transit.

Whereas: Students' ability to access and utilize transit hubs is essential to connect students between their university and home.

Whereas: Both local and inter-regional transit should be physically accessible to all students, including those with mobility concerns, audio/visual impairments, and other related disabilities.

Whereas: Both local and inter-regional transit should be financially accessible for all students, regardless of their financial position.

Whereas: Students deserve to be treated fairly under the Ontario municipal bylaws.

Whereas: Bylaw enforcement should fairly impact all residents of a municipality.

Whereas: Students should enjoy the same rights and privileges as any member of a municipality.

Whereas: Near-campus neighbourhoods should be consciously planned and developed, with the aim of better integrating post-secondary students within their respective communities.

Whereas: Post-secondary students should be consulted in the planning and development of near-campus neighbourhoods.

Whereas: Housing supply should meet demand in student communities.

Whereas: Students should be aware of any personal information that government services and post-secondary institutions have access to.

Whereas: Crime prevention mechanisms should be tailored to the needs of the municipalities.

Whereas: Community development and crime prevention should be evidence informed.

Whereas: Students should have the ability to engage in meaningful experiential learning opportunities within their respective municipalities.

Be it resolved that: The Ministry of Municipal Affairs and Housing should implement a standardized process that would require all landlords to register for an annual license of any rental property.

Be it further resolved that (BIFRT): The provincial government should work with the Association of Municipalities of Ontario to establish an advisory committee on student housing issues to identify concerns and develop solutions to issues related to quality and affordability.

BIFRT: The provincial government should develop standardized rental increase communication guidelines that require notices for rent increases to include the original rent amount, the approved provincial increase, the new rental rate, and the period of time a tenant has to make an application to the Landlord Tenant Board should they be concerned about the validity of the increase.

BIFRT: The provincial government should work with Legal Aid Ontario, municipalities, university administrators, as well as student associations to adequately fund the promotion and reinforcement of tenant rights and responsibilities, with an emphasis on reaching international and non-official language speaking students.

BIFRT: The provincial government should reinvest in provincial legal aid, earmarking funding to support student access to legal services.

BIFRT: The provincial government should provide grant funding, available to on campus and community legal services or other student-serving groups, to establish access to free legal services for students.

BIFRT: The Ministry of Municipal Affairs and Housing should mandate municipalities to create more stringent rental bylaw processes with an emphasis on high-occupancy tenancies.

BIFRT: The Ministry of Municipal Affairs and Housing should establish a free, province-wide, public database of landlords to ensure quality and transparency between landlords and tenants.

BIFRT: The Ministry of Municipal Affairs and Housing should review the *Residential Tenancies Act* and consult with student and tenant rights advocacy groups to identify and eliminate gaps in pre-tenancy rights.

BIFRT: The provincial government should amend the *Residential Tenancies Act* to require that, in the case that extensive construction on a rental unit is not complete on a contractually binding move-in day, tenants are returned their deposit and rent payments for the period of time they are not occupying the unit, regardless of whether or not the tenant chooses to terminate the lease.

BIFRT: The provincial government should amend section 83(6), Refusal for certain arrears of rent, of the *Residential Tenancies Act* to protect a tenant's ability to raise the defence at arrears of rent hearings.

BIFRT: The provincial government should amend section 78(7), Order for arrears, of the *Residential Tenancies Act* to no longer subject former tenants to hearings at the Board without proper service of legal documents.

BIFRT: The provincial government should amend the *Residential Tenancies Act* to prohibit landlords from collecting rental deposits prior to a building obtaining a Final Occupancy Permit.

BIFRT: The provincial government should amend the *Ontario Human Rights Code* to ensure that the right to be free of discrimination applies to boarders who share bathroom and kitchen facilities with their landlord or their immediate family.

BIFRT: The Ministry of the Attorney General should appoint a sufficient number of adjudicators in order to ensure that claims made to the Landlord and Tenant Board by student tenants and other vulnerable demographics meet the Landlord and Tenant Board Service Standards.

BIFRT: After the completion of the Ontario Ombudsman's investigation into the delays of the Landlord and Tenant Board, the Ministry of Municipal Affairs and Housing should consult campus student housing groups and student associations to respond to the findings of the inquiry.

BIFRT: The Ministry of the Attorney General and the Ministry of Municipal Affairs and Housing should establish a single complaints and claims process by developing a clear and comprehensive plan for the integration of the Landlord and Tenant Board and of the Rental Housing Enforcement Unit.

BIFRT: The provincial government should amend the Fee Waiver eligibility requirements to be inclusive of OSAP-eligible students and students with demonstrated financial need.

BIFRT: The Ministry of Transportation should coordinate with Metrolinx and the Ontario Northland Transportation Commission to develop an environmentally sustainable, long-term, inter-regional transit plan that would take into account post-secondary institutions.

BIFRT: The provincial government should reinvest in a high speed rail along the Windsor-Toronto Corridor and the Toronto-Ottawa corridor.

BIFRT: The provincial government should amend Ontario Regulation 189/09: Go Transit Service Area to expand transit routes throughout the province, ensuring that all students have access to inter-regional transportation services.

BIFRT: The provincial government should establish direct transportation routes connecting post-secondary transit hubs to regional and international airports in the province.

BIFRT: The provincial government should pause the repeal of the *Public Vehicles Act* and reform the Act to align with the 2016 Intercity Bus Modernization discussion document and the results of consultations with student stakeholders and experts.

BIFRT: The provincial government should commit to a long-term expansion of provincial contributions to the Metrolinx operating and capital budgets to facilitate long-term labour stability and the ability for Metrolinx to offer transit services to students in areas not economically viable to service through the private sector.

BIFRT: Metrolinx should strike a permanent advisory committee, comprised of student representatives from each region that is serviced, to advise on transit issues and infrastructure development that affects post-secondary students.

BIFRT: Ontario Northland should strike a permanent advisory committee, comprised of student representatives from each region that is serviced, to advise on transit issues and infrastructure development that affects post-secondary students.

BIFRT: Metrolinx should adopt one seat for student representation on their board of directors to address student concerns and opportunities for improved service between university transit hubs.

BIFRT: Ontario Northland should adopt one seat for northern student representation on their board of directors to address student concerns and opportunities for improved service to better connect northern students to their universities.

BIFRT: The Ministry of Colleges and Universities and the Ministry of Transportation should work with student groups to create a template for institutional responses to transit disruptions, including provisions for students who are affected, such as allowing students to attend classes remotely.

BIFRT: The Ministry of Transportation should prioritize northern municipalities when distributing funding through the Community Transportation Grant Program.

BIFRT: The provincial government should invest in rapid transit projects in municipalities with post-secondary institutions.

BIFRT: The provincial government should adjust the “heads and beds” levy in accordance with inflation to account for the additional wear and tear on local transit infrastructure.

BIFRT: The provincial government should expand the Ontario Community Transportation Grant Program and prioritize municipalities with post-secondary institutions and active transportation or ‘Complete Streets’ plans within its eligibility criteria.

BIFRT: The provincial government should provide envelope funding to municipalities who wish to implement innovative active transit pilot programs.

BIFRT: The provincial government should implement First and Last Mile planning in all existing and future transit hub developments to ensure that students can access transit without driving.

BIFRT: The Ministry of Community and Social Services should expand the Ontario Disability Support Program to provide reduced-cost inter-regional transit services for persons with disabilities.

BIFRT: The Ministry of Transportation should provide funding to Metrolinx, Ontario Northland, and other local transit authorities to offer stronger discounted student pricing.

BIFRT: The Ministry of Transportation should work with students and others in the disability community to identify and respond to gaps in Part V: Transportation Standards in Ontario Regulation 191/11 of the *Accessibility for Ontarians with Disabilities Act* that fail to address the needs of students with disabilities accessing public transit.

BIFRT: The Ministry of Municipal Affairs and Housing should develop accountability measures in consultation with student representatives and the Ontario Human Rights Commission to ensure municipalities do not create by laws that discriminate against students in practice.

BIFRT: The Ministry of the Attorney General should issue a statement—for the courts to adhere to—that recognizes student status as a proxy for age, marital status, or recipient of public assistance in order to grant better protection under the *Ontario Human Rights Code*.

BIFRT: The Ministry of Municipal Affairs and Housing should review the developed accountability measures in consultation with the Ontario Human Rights Commission.

BIFRT: The Ministry of Municipal Affairs and Housing should add a section to the Provincial Policy Statement that discusses the benefits of green spaces within near-campus neighbourhoods.

BIFRT: The Ministry of Municipal Affairs and Housing should add a section to the Provincial Policy Statement that discusses development guidelines, specifically by addressing the merits of mixed-use zoning for near-campus neighbourhoods.

BIFRT: The Ministry of Municipal Affairs and Housing should add a section to the Provincial Policy Statement that addresses the merits of intensifying housing stock through upzoning if required in near-campus neighbourhoods.

BIFRT: The Ministry of Colleges and Universities should mandate that students be made aware of all memorandum of understanding agreements between government services and post-secondary institutions that deal with student information

BIFRT: The Ministry of the Solicitor General and the Ministry of Municipal Affairs and Housing should develop provincial crime prevention and community safety policies that prioritize the voices of a diverse array of community members so that programs can be adapted based on the needs of those community members.

BIFRT: The provincial government should fund development and analysis to assist municipalities in effectively collecting and using data in an ethical and transparent manner to understand local issues including but not limited to, crime, safety, gender-based violence.

BIFRT: The provincial government should provide envelope funding for workshops and conferences between municipalities and universities aimed at developing and improving partnerships, public engagement and student engagement in crime prevention activities.

BIFRT: The provincial government should provide investments in local work-integrated learning opportunities with a focus on community-building and partnerships between the municipality and students.

BIFRT: The Ministry of Colleges and Universities should mandate that each post-secondary institution publicly release a standardized yearly public report indicating all allocations of the Campus Safety Grant.

BIFRT: The provincial government should partner with the United Nations Safe Cities Initiative to collect data and create informed strategies to protect Canadians in their municipalities and work with student associations to create informed strategies to protect students in their municipalities.