



# Append 1- Licensing Rental Properties Comprehensive Consultation Report.docx January 21, 2020



# **Contents**

Co	ontent	s		2
Er	igagei	ment	Summary	3
	Consi	derat	ion of Results	3
1	Bac	kgro	und	4
	1.1	Stra	tegic Goal	
	1.2	City	Project Team	
	1.3	Spo	kesperson(s)	4
	1.4	Sun	nmary of Engagement Strategy	4
2	Inte	rviev	/s	8
	2.1	Pha	se 1 - Interviews	8
	2.1.	1	Intended Audience	8
	2.1.	2	Marketing Techniques	8
	2.1.	3	Analysis	8
	2.1.	4	Data limitations	8
	2.1.	5	What We Heard	9
3	Sur	vey.		9
	3.1	Met	hod	9
	3.1.	1	Marketing Techniques	10
	3.1.	2	Analysis	10
	3.1.	3	Data limitations	10
	3.1.	4	What We Heard	10
4	Eva	luatio	on	11
5	Nex	t Ste	ps	11
Αp	pendi	x A -	- Interview Questions	12
Αp	pendi	xB:	Survey	12
Ar	pendi	x C.	ROSA Survey Response	16



### **Engagement Summary**

At its regular business meeting on December 4, 2017, City Council resolved that Administration

"explore a licensing program for rental property businesses which includes provisions to regulate nuisance calls for emergency services, consult with key stakeholders including, but not limited to, the Saskatchewan Landlord Association, Saskatoon Housing Initiatives Partnership and Renters of Saskatoon and Area, and report back including recommendations to City Council."

Engagement was conducted in two phases and included Saskatoon Housing Corporation, Saskatoon Housing Authority, Saskatoon Homelessness Initiatives Partnership, the Office of Residential Tenancies, the Saskatchewan Human Rights Commission, Renters of Saskatoon and Area, the Saskatchewan Landlords Association, the Pleasant Hill Community Association and King George Community Association. A request for consultation was also submitted to the Saskatchewan Health Authority, who did not provide input.

The first phase of consultation focused on high-level discussion regarding regulations for emergency calls for service at rental properties, as well as other potential outcomes of a rental property licensing program. Through the first phase of consultation it was observed that stakeholders primary desired outcomes for a licensing program would be to ensure property maintenance standards are upheld at rental properties and owner occupied dwellings, landlords and property owners are held accountable when those standards are not maintained, and to address nuisance behaviour in relation to all residential dwellings forms.

In the second phase of consultation, a survey gauging perceived importance of potential options among stakeholders was developed based on the input received in the first phase, as well as approaches in other municipalities. The majority of stakeholders completed the survey by email, while others were completed during in person meetings.

The Community Standards Division, Saskatoon Fire Department (SFD) and Saskatoon Police Service (SPS) worked jointly in the development of options being recommended regarding both boarded-up properties and licensing rental properties. This included sharing feedback heard during all phases of engagement regarding these topics. Feedback received in the development of report options for both boarded-up properties and licensing rental properties is included in this engagement report.

#### **Consideration of Results**

Initial consultations considered how a licensing program could regulate nuisance calls for emergency services at rental properties. Stakeholders also identified that desired outcomes included ensuring property maintenance standards are upheld, important information is readily available, landlords and property owners are held accountable when those standards are not maintained and to address nuisance behaviour in relation to all residential dwellings forms.

Many stakeholders raised concerns about unintended consequences of penalizing calls for emergency service, in non-emergency situations, including that it may discourage tenants from calling during an actual emergency due to real or perceived repercussions from the landlord. In 2017, administration reported municipalities that charge fees associated with nuisance calls to landlords have resulted in the eviction of tenants. In some cases, to avoid eviction, tenants choose not to call for emergency services when they or someone else may legitimately need help.

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The project teams considered input from stakeholders in the recommendation of options for both boarded up properties and licensing rental properties. The input provided throughout the engagement process helped to guide further research in other municipalities, and develop the options being presented to City Council.

### 1 Background

Engagement was completed by the Licensing & Permitting Section on Licensing Rental Properties and Regulations of Nuisance Calls for Emergency Services. This project was in response to a resolution by City Council on December 8, 2017:

"That the Administration be directed to explore a licensing program for rental property businesses which includes provisions to regulate nuisance calls for emergency services, consult with key stakeholders including, but not limited to, the Saskatchewan Landlord Association, Saskatoon Housing Initiatives Partnership and Renters of Saskatoon and Area, and report back including recommendations to City Council through the Standing Policy Committee on Planning, Development and Community Services."

Furthermore, this engagement summary serves to address the resolution made by the Standing Policy Committee on Planning, Development and Community Services at its meeting on August 12, 2019:

"That the Administration report back by fourth quarter in 2019 about current City and other agency engagement with currently boarded-up houses in Pleasant Hill and other neighbourhoods experiencing similar rates, identifying process to ensure more comprehensive and proactive follow up on this issue in our city."

### 1.1 Strategic Goal

This report and engagement support the City of Saskatoon's Strategic Goal of Quality of Life by ensuring bylaws, policies and procedures are effective in ensuring the health, safety and quiet enjoyment of neighbourhoods is maintained.

# 1.2 City Project Team

Project Lead: Michele Garcea, Planner, Community Standards

Manager: Mark Wilson, Licensing and Permitting Manager, Community Standards Contributor: Wayne Rodger, Assistant Chief Public Relations & Community Risk Public Engagement Consultant: Mandy Fehr, Strategy & Transformation

# 1.3 Spokesperson(s)

Jo-Anne Richter, Director of Community Standards

# 1.4 Summary of Engagement Strategy

This project predates the City of Saskatoon's Engagement Policy. While an engagement strategy was not initially developed as part of the reporting process, the project team worked with the City of Saskatoon's Community Engagement team to create this summary of the engagement plan.

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Stakeholder	Level of Participation	Objective	Engagement Goal	Engagement Activity/Comp onent
(ROSA) Renters of Saskatoon and Area	Involve	Work with citizens to ensure concerns and priorities are understood	An understanding of how stakeholders could be impacted by a rental licensing program.  An understanding of stakeholder aspirations and concerns related to rental housing and nuisance complaints	
	Consult	Obtain Feedback	Identification of option preferences.  Identification of concerns and opportunities related to the options presented.	Survey
Saskatchewan Landlord Association	Involve	Work with citizens to ensure concerns and priorities are understood	An understanding of how stakeholders could be impacted by a rental licensing program.  An understanding of stakeholder aspirations and concerns related to rental housing and nuisance complaints	
	Consult	Obtain Feedback	Identification of option preferences.  Identification of concerns and opportunities related to the options presented.	Survey
Saskatchewan Human Rights Commission	Involve	Work with citizens to ensure concerns and priorities are understood		



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	Consult	Obtain Feedback	Identification of option preferences.	Survey
			Identification of concerns and opportunities related to the options presented.	
Office of Residential Tenancies	Involve	Work with citizens to ensure concerns and priorities are understood. Work with Citizens to ensure	An understanding of how stakeholders could be impacted by a rental licensing program.  An understanding of stakeholder aspirations and concerns related to rental housing and nuisance complaints.	Interview
Saskatoon Housing Initiatives Partnership	Involve	Work with citizens to ensure concerns and priorities are understood. Work with Citizens to ensure	An understanding of how stakeholders could be impacted by a rental licensing program.  An understanding of stakeholder aspirations and concerns related to rental housing and nuisance complaints.	Interview
	Consult		Identification of option preferences.  Identification of concerns and opportunities related to the options presented.	Survey
Saskatchewan Housing Corporation (SHC)	Involve	Work with citizens to ensure concerns and priorities are understood	An understanding of how stakeholders could be impacted by a rental licensing program.  An understanding of stakeholder aspirations and concerns related to rental housing and nuisance complaints	Interview
	Consult	Obtain Feedback	Identification of option preferences.	Survey



			Identification of concerns and opportunities related to the options presented.	
Saskatoon Housing Authority	Involve	Work with citizens to ensure concerns and priorities are understood	An understanding of how stakeholders could be impacted by a rental licensing program.  An understanding of stakeholder aspirations and concerns related to rental housing and nuisance complaints	Interview
	Consult	Obtain Feedback	Identification of option preferences.  Identification of concerns and opportunities related to the options presented.	Survey
Pleasant Hill Community Association	Involve	Work with citizens to ensure concerns and priorities are understood. Work with Citizens to ensure	An understanding of how stakeholders could be impacted by a rental licensing program.  An understanding of stakeholder aspirations and concerns related	Interview Survey
			to rental housing and nuisance complaints.	
King George Community Association	Involve	Work with citizens to ensure concerns and priorities are understood. Work with Citizens to ensure	An understanding of how stakeholders could be impacted by a rental licensing program.	Interview



### 2 Interviews

#### 2.1 Phase 1 - Interviews

Interviews were held in person with identified stakeholders where possible, if the organization was not able to respond in person, they were given the ability to respond via email or telephone. Some groups chose to use a combination of all identified methods. Consultations were directed using the same set of predefined questions for all groups, engagement questions were open ended and groups had an opportunity to provide additional feedback at their discretion (see Appendix A).

#### 2.1.1 Intended Audience

City Council directed the Administration to consult with the Saskatchewan Landlord Association, Renters of Saskatoon and Area and the Saskatoon Housing Initiatives Partnership. The Office of Residential Tenancies, the Saskatchewan Human Rights Commission, The Saskatchewan Health Authority, were added due to their interest in matters related to housing. The Pleasant Hill Community Association and King George Community Association also requested to be included in these consultations.

#### 2.1.2 Marketing Techniques

Organizations were initially contacted via email, with engagement either occurring via email, telephone or in person meetings, depending on the preference of the stakeholder. While the Saskatchewan Health Authority initially expressed interest in participating in the consultation, at the time of preparing this report, a further response has not been received. The King George Community Association contacted our office after hearing of the report regarding rental property licensing presented at the December 18, 2017, meeting of city council, initial comments were provided however they did not participate through all stages of engagement. The Pleasant Hill Community Association was included in engagement after delivering a call to action at the August 12, 2019, meeting of the Standing Policy Committee on Planning Development and Community Services.

A meeting was held on September 19, 2019, with the Pleasant Hill Community Association, at this meeting the Saskatoon Fire Department presented material regarding boarded-up properties including, inspection boundaries, complaint volumes by neighbourhood, boarding requirements, forms of boarded up buildings, potential options to address the timelines buildings can be boarded, and the allocation of further resources in the Pleasant Hill Community. The Community Standards Division presented material regarding the licensing of rental properties as well as potential alternatives. The Community Association provided feedback on both topics.

### 2.1.3 Analysis

The focus in phase one was on qualitative data analysis. The project team identified themes in the interviews of upholding property maintenance standards, landlord and property owner accountability when those standards are not upheld and addressing nuisance behaviour related to all dwelling forms. These specific themes were taken into account and options were selected based on research of practices in other municipalities and feasible methods to achieve the identified objectives.

#### 2.1.4 Data limitations

Some interview responses due to confidentiality requirements cannot be published at the request of stakeholder groups. A request for consultation was also submitted to the Saskatchewan Health Authority, who did not provide input.



#### 2.1.5 What We Heard

The organizations consulted provided different input on the topics, and represented a variety of perspectives on the issue. Three main themes from all organizations were ensuring property maintenance standards inside and outside of residential properties are upheld, landlord and property owner accountability for maintenance standards, and resolving nuisance behaviour emanating from all dwelling forms in an effective manner.

In phase one respondents raised specific concerns regarding:

- Requiring all rental properties to obtain a license, not focusing on problematic properties;
- The implementation of a licensing program that does not address single family homes; as many perceived problems emanate from single family dwellings;
- Applying a different set of conditions to rental and owner occupied dwellings;
- Education of tenants, landlords and the public about regulations, rights and responsibilities;
- Landlords and property owners ought to be accountable for the condition of their property;
- Charging landlords a nuisance abatement fee for the behaviour of tenants, which could create
  a disincentive for tenants to call for police service;
- Ensuring important emergency contact information is easy to find;
- Posting of essential non-emergency contact information;
- Ensuring tenants and residents can navigate bylaws and have accessible information;
- Lack of supports for tenants and landlords to resolve disputes when required;
- Possible increased rents to tenants from the implementation of a licensing program;
- A need for more fire inspectors;
- Tightening timelines for remedying boarded up properties;
- Ensuring boarded properties are adequately secure;
- Incentives be provided to landlords that enter the Crime Free Multi Housing Program; and
- Overall effectiveness of a licensing program to address problematic properties.

Engagement was focused on issues related to a rental property licensing program. During the engagement issues brought forward by stakeholders which were outside of the scope of the project were forwarded to relevant sections, including information sent to Saskatoon Fire on matters regarding boarded up properties and other information to the Public Engagement section for additional consideration.

# 3 Survey

### 3.1 Method

Phase two consultations consisted of a survey distributed via email. Participants were invited to provide additional comments when responding to the survey. All stakeholders were also given notice they would be able to provide comments or letters which would be considered and included in the report as an appendix. Further meetings were held in person with stakeholders when requested. Some groups chose to use a combination of email, telephone and in person meetings to

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submit feedback as required. The only group to include comments as an appendix to this report were the Renters of Saskatoon and Area.

The questions in the second phase survey asked organizations to evaluate options. The options were developed based on input provided in phase one and alternatives being implemented in other municipalities.

### 3.1.1 Marketing Techniques

Materials were distributed via email, further follow up was also done via telephone or in person.

### 3.1.2 Analysis

In phase two the purpose was to determine preferred options of stakeholders by ranking options perceived importance. Both the quantitative analysis of perceived importance of options and additional qualitative comments were considered in the recommendation of options.

#### 3.1.3 Data limitations

Some meetings and survey responses due to confidentiality requirements of the stakeholder groups cannot be published. The Office of Residential Tenancies abstained from the second phase of consultation. The Pleasant Hill Community Association voiced that the targeted focus of the second phase survey was a constraint, and as such decided to submit qualitative comments and conduct a survey of residents in their area in the second phase. These comments were given full consideration and were forwarded to the Saskatoon Fire Department and to Public Engagement for additional follow-up.

#### 3.1.4 What We Heard

In the second phase of consultation, participants were asked to identify the importance of possible recommendations, the Renters of Saskatoon and Area additionally wanted their comments included as an appendix, (see Appendix C). The following is a ranking of options by perceived importance among all stakeholder groups surveyed:

- Landlord and tenant education;
- Building Community Cohesion;
- Utilization of the fee for service model;
- Pro-active and follow-up property inspections; and
- Licensing rental properties.

Additional comments from various stakeholders groups included:

- Relying on vulnerable people to identify property maintenance concerns will be ineffective;
- Community members should be empowered to call for help and identify issues;
- Make sure properties are safe and clean before new tenants move in;
- Tenants in receipt of public assistance are hesitant to report problems in fear of retaliation, including eviction and eventual homelessness;
- Charging an excessive nuisance abatement fee may cause many unintended consequence;

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Timelines to address property maintenance conditions must be tightened;



- Saskatoon Fire should continue pro-active inspections with the Ministry of Social Services;
- Pro-active property inspections would be ideal to target landlords who don't comply;
- Landlord Licensing would be an effective way to distribute material to landlords;
- Tenants need access to plain language bylaws and important contact information;
- Landlords may offload costs of fines and licenses through rent increases onto tenants reducing affordable rental supply; the City should ensure costs are not passed onto tenants;
- We should be targeting problematic landlords not those that are compliant;
- Licensing could facilitate license revocation to shutdown bad landlords;
- Moldy carpets in apartments need to be replaced;
- Licensing must apply to the rental of one-unit dwellings;
- Licensing will not address owner occupied properties in unsightly/unsafe conditions; and
- Licensing will not address crime, graffiti, squatters, vandalism, gangs and drugs.

### 4 Evaluation

A variety of issues were identified in phase one, the questions in phase two took into consideration this input, feasible approaches from other jurisdictions and evaluated the perceived importance of potential options among stakeholders (see Appendix B). This input was used to guide options being presented to City Council.

The Pleasant Hill Community Association expressed concerns regarding engagement methodology. To ensure they were able to share full comments on the process and potential options presented, they were given an opportunity to submit written comments as an appendix to this report; however, those comments were not received by the deadline. There will be another opportunity for stakeholder groups and the public to provide written comments or request to speak to City Council at the time of this report becoming public.

### 5 Next Steps

Additional engagement may be conducted regarding both boarded-up properties and or licensing rental properties depending on report options selected by City Council. All information received including information related to the broader issues of safe housing has been shared with the applicable internal departments including the Saskatoon Police Service, Saskatoon Fire and the Public Engagement Team who will follow up with stakeholders.

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### **Appendix A – Interview Questions**

Prior to meeting on July, 30 2019, our office wanted to share some of the questions we will cover. While notes will be taken during the meeting you are welcomed to provide a written response. If you feel something has been missed or have additional comments feel free to provide that information in your response.

- 1. Does your organizations have any concerns/issues regarding emergency calls, nuisance behaviour and property maintenance at rental properties?
- 2. Are you familiar with municipal licensing of rental properties in other jurisdictions?
- 3. Do you anticipate that your concerns with emergency calls, nuisance behaviour and property maintenance will be addressed through a licensing program?
- 4. Does your organization have any concerns with the City of Saskatoon introducing a licensing program for rental properties?
- 5. Do you feel there are any issues related to rental properties which could be better addressed through either a licensing program or amendments to current bylaws?

As part of enforcing bylaws or in implementing a licensing program, the City may recover costs incurred, such as excessive emergency calls for nuisance behaviour, or in addressing property maintenance issues. In your organization's opinion:

- Who should be responsible to pay fines related to property maintenance?
- Who should be responsible to pay fines related to nuisance behaviour?
- Would a licensing program address property maintenance and nuisance abatement issues in the city?

If you have any questions or comments please feel free to contact me directly. Thank you for your time and consideration on this matter.

### **Appendix B: Survey**

# **Survey - Licensing Rental Properties**

Thank you for participating in the first phase of consultation. The purpose of the first phase was to have a high-level discussion with key community stakeholders on perceptions, implications and desired outcomes of a rental property licensing program.

Responses varied between different groups, but the most common desired outcome of a licensing program was to ensure property maintenance standards are upheld, and that nuisance behaviour is addressed.

The second phase of consultation was developed based on your input from the first phase, and addresses specific measures that could be implemented as an alternative approach to licensing rental properties, or as an enhancement to it. These additional approaches are based on approaches in other municipalities and are attended to achieve the same outcomes as a rental property licensing program.

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Following this next phase of consultation our office will report back to the Standing Policy Committee on Planning Development and Community Services, which provides advice and recommendations to City Council. Your organization's survey responses will be included in that report and will be publicly available. Your responses will help the City to prioritize identified action items in relation to either a licensing program or alternative approach. Please let us know if you do not want your survey results made publicly available with the report.

### 1. Landlord and Tenant Education

The *Housing Handbook* highlights programs designed to help low-to-moderate income people find adequate and affordable housing to rent or purchase. It outlines the rights and responsibilities of tenants and landlords and provides tools and information to guide tenants through the rental process.

The *Good Neighbour Guide* is expected to be available in December 2019. This easy to follow booklet will explain regulations and requirements for residents. The goal of the guide is to inform the public about local bylaws. This publication is set to be completed by December 2019.

### Advantages:

- Assist in educating landlord and tenants' rights and responsibilities;
- Informs the public about bylaws related to property maintenance; and
- Provides important contact information to tenants and landlords.

**Question:** How important is the distribution of applicable educational materials to help inform tenants and landlords of their rights and responsibilities?

Prefer not to answer	Not important	Somewhat Important	Important	Fairly Important	Very Important

### 2. Building Community Cohesion

In conjunction with Crime Free Multi Housing Program (CFMH), the owner/manager of a multi-unit dwelling can promote safe rental in the community by hosting an annual safety social for residents. These events offer managers and residents a chance to get together and address safety and security issues, learn important crime prevention tips from police, share improvement ideas, and get to know their neighbours.

To support community cohesion and promote property maintenance, property managers in other western Canadian cities have hired or compensate residents to perform cleaning and maintenance around the properties they live in. This provides more ownership and oversight of the property from residents of a building.

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<sup>\*\*\*</sup>Rate the following objectives by importance from 'not important' to 'very important'.\*\*\*

### Advantages:

- Generates a strong sense of community;
- introduces neighbours to one another; and
- encourages community members to consider and discuss safety.

**Question:** How important is building community cohesion?

Prefer not to answer	Not important	Somewhat Important	Important	Fairly Important	Very Important

### 3. Utilization of a Fee for Service Model

The fee for service model is a method for addressing bylaw contraventions by recovering the costs associated with remedying bylaw contraventions. The City of Saskatoon currently utilizes this method in selected areas of enforcement. Under this model when a bylaw contravention is identified, an order is issued, providing a timeline to comply, if the contravention is not remedied in the time prescribed;

- A contractor is hired at the expense of the property owner to remedy the contravention; and
- the fees associated with remedying are applied to the tax roll if left unpaid.

### Advantages:

- Ensures cost associated with remedying bylaw contraventions are paid by the property owner and not taxpayers;
- provides tightest possible timeline to remedy those contraventions; and
- applies to both rental and owner occupied housing.

**Question:** How important is the use of a fee for service model in remedying bylaw contraventions?

Prefer not to answer	Not important	Somewhat Important	Important	Fairly Important	Very Important

### 4. Pro-active and Follow-up Property Inspections

Currently enforcement under The Property Maintenance, and Zoning Bylaw is conducted on a complaint based system. Moving to a pro-active identification and enforcement system could serve to better address properties with recurring contraventions. This may include conducting additional follow-up inspections at a property to ensure that compliance is maintained.

These approaches will require increased staffing resources both for Bylaw Compliance and Saskatoon Fire.

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### Advantages:

- Pro-active tool for property maintenance enforcement;
- assists in ensuring property maintenance is completed in a timely manner; and
- ensures issues related to property maintenance don't re-emerge.

**Question**: How important is moving towards a pro-active property inspection?

Prefer not to answer	Not important	Somewhat Important	Important	Fairly Important	Very Important

### 5. Licensing Rental Properties

Rental property licensing is a framework through which standards for the rental of dwellings with more than two units can be established, regulated, inspected and enforced. Under this program, property owners would be required to obtain a business license for their rental property. If the property owner does not comply with bylaws, the City can enforce by revoking their license.

### Advantages:

- Can require absent property owners to utilize a professional property manager or local contact;
- Provides the ability to implement an excessive nuisance abatement fee; and
- a single license to enforce on many bylaw violations.

#### Disadvantages:

- Requires significant time, cost, and staffing resources to establish and manage.
- Increases costs to tenants, if licensing fees are passed on through higher rents;
- only applies to rental building with more than two units,
- does not include owner occupied dwellings, single homes or duplexes; and
- is not targeted specifically on problematic properties.

**Question:** How important is the implementation of a rental property licensing program?

Prefer not to answer	Not important	Somewhat Important	Important	Fairly Important	Very Important

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### **Appendix C: ROSA Survey Response**



RENTERS of SASKATOON and Area (ROSA)

# <u>Submission - Phase Two: Landlord Licensing of Rental Properties</u> <u>October 28, 2019</u>

### 1. Education: Fairly Important

Safety system awareness and improved forms of access to details, including community contacts for the diversity of emergency and non-emergency property concerns would be one required step towards education and fair inclusion of all.

A diversity of methods of awareness and access would fairly be needed to equitably value and meet the safety and navigation needs of vulnerable, marginalized or low income citizen renter households, including emergency after-hours service. Regular, reliable and independent access to hard copies of Housing Handbooks or other safety booklets is essential, particularly for those without access to adequate home or after-hours working internet or skills, phone access to keep homes safe, and other barriers to independently access vital property maintenance or emergency information, if one of the goals is to improve equitable community safety, inclusion and social cohesion.

Repeated untargeted awareness handbooks distributed through short-term bulk mail may help many in stable housing but will not adequately meet the long-term accessibility needs or range of issues for the vulnerable and marginalized Saskatoon renter households, who for example lack reliable access to mail, have a high turnover of household occupants, or turnover of tenancies too.

Additionally, long-term secured posting of bylaw info and contact info for office hours and after-hours for all occupants of units to access day or night, to fairly meet the needs of the many marginalized renter populations.

A helpful awareness and distribution process in apartment and condo buildings would be similar to the City's recycling poster and flyer distribution process in October. Awareness posters and literature should offer further clear and fair references to both plain language versions and full and complete property regulation details.

### 2. Building Community Cohesion: Fairly Important.

The Renters voice on what the community of Saskatoon needs to hear: "Deal with the social problems". 2017 consultation.

Developing community cohesion is important to restore the trust of marginalized and harmed citizens in the range of landlord licensing issues. A diversity of community safety awareness opportunities are still needed for all ages and forms of housing. Further exploration is needed. A more balanced range of the currently police-defined awareness, delivery, and promotion of safe housing supports could further raise community cohesion, to meet the concerns of marginalized tenants.

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Planning to reposition the consumer/tenant into a labourer role in a landlord licensing and safety engagement system is likely to risk some community disengagement, and further loss of marginalized tenants' faith in community actions towards safety for all.

Meaningful inclusion and community cohesion could be built instead, for example by accommodating the diverse needs of marginalized tenants for effective access to system information and supports, valuing consumer expertise enough to support capacity-building of tenants towards inclusive and current system advocacy advisors, or have a role among evaluators of licensing accountability outcomes as valued consumers.

A municipal rental housing strategy with both tenant and affordable rental housing protections are needed as part of addressing both community cohesion and safe residential properties.

### 3. Fee for service model: Important

The costs of developing a licensing program are necessary to become a sustainable, safe community that includes low income tenants.

### 4. Pro-active Property Inspections and Follow-up: Very Important

The Renters voice on what landlords need to do differently: "Quit running off after they collect rent cheque." 2017 consultation.

The Renters voice on maintenance of rental properties: "Once there was new ownership in the building, cleanliness levels improved". 2019 consultation.

Proactive inspections of repeat violators paired with licensing enforcements and increased property maintenance bylaw standards are all needed for more effective limits on persistent property bylaw violations including the domination of vulnerable tenants by predatory businesses.

#### 5. Licensing: Very Important

The Renters voice on what the landlords need to do differently: "Fix units before renting them". 2017 consultation.

Lack of licensing for properties with 2 rental units remains a concern, leaving too many marginalized and isolated tenants unprotected in some areas.

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Licensing of rental housing properties is an essential step towards developing and valuing effective tenant protections as part of community safety, impacting tenants' lives, belongings and opportunities.

