

# Evictions in Toronto

Research Insight Note



## About us

---

The Canadian Centre for Housing Rights (CCHR) is Canada's leading non-profit organization working to advance the right to housing. Founded in 1987, CCHR has worked tirelessly for over 35 years at the intersection of human rights and housing. We advance the right to housing by serving renters to help them stay housed, providing education and training about housing rights, and advancing rights-based housing policy through research, policy development, advocacy and law reform.

## About our research on evictions in Toronto

---

This insight note provides an overview of current research insights on evictions in the rental housing market in Toronto and North America more broadly.

CCHR has developed this research insight note as part of a study on evictions in rental housing in Toronto. Specifically, the study aims to build an understanding of the nature and prevalence of informal evictions. This type of eviction occurs when a renter household involuntarily leaves their rental unit after being forced or pressured by a landlord to move out without going through the full legal process.

Findings from this study will help to build an understanding of the impact of evictions with the aim of informing policy solutions to address these issues.

## Acknowledgements

---

This study has been generously funded by the City of Toronto's "Toronto Tenant Support Program."

# Diminished housing affordability and the growing threat of eviction

In recent decades, eviction from rental housing has become a growing concern for tenants, researchers, and policymakers as an increasing proportion of mainly urban residents have come to rely on the rental housing market to access affordable housing in Canada.<sup>1</sup> In Toronto, nearly half (48%) of the city's residents rent their homes and close to 40% of renter households live in unaffordable housing, meaning they spend 30% or more of their income on housing.<sup>2</sup> As rents in the private rental housing market continue to rise, following years of unprecedented overall increases, many tenant households are finding it increasingly difficult to cover the cost of housing and are at risk of eviction if they fall behind on rent.<sup>3</sup>

With the decline of social and non-profit housing options over the past few decades, the private rental housing market has played an increasingly central role in providing homes for lower income households. In Ontario, a lack of rental regulations on vacant units ("vacancy decontrol") and exemptions for new units occupied for the first time upon entering the rental market, on and after 15 November 2018, creates incentives for landlords to evict existing and often long-standing tenants to increase rent on regulated older builds between tenancies.

Increases in instances of eviction have been closely linked to a general decline in rental housing affordability, which can be understood as tenant households' ability to sustainably cover their housing costs over time. Lower income households routinely pay a substantial proportion of their income on rent (often over 30%), and are at a higher risk of falling behind on rent and facing eviction as a result.<sup>4</sup> Spending so much of their income on housing further detracts from their ability to cover the cost of basic expenses like food, heating, transportation, medicine, telecommunications, and other essentials.

Although landlords in Ontario can legally evict tenants for a number of reasons, a large majority of eviction applications to the provincial Landlord and Tenant Board (LTB) concerning tenants living in Toronto occur due to rental arrears.<sup>5</sup> In addition to the low supply of affordable rental housing options available in Toronto, vacancy decontrol and the exemptions on rent regulations for newer units have created additional incentives for landlords to push out existing tenants (especially long-standing tenants paying much lower rental rates) so that they can charge new tenants the current rates which are much higher. In recent years, these gaps in the rent regulation frameworks in Ontario have allowed for some significant rent increases in units that fall outside regulations. For example, the Canada Mortgage and Housing Corporation's (CMHC) 2022 Rental Market Report demonstrated that from October 2021 to October 2022, rental rates for 2-bedroom units in Toronto's primary rental market that fall outside of existing regulations increased by 29% for new tenants, compared to 1.2% for the same unit types covered by provincial rent regulations.<sup>6</sup> Taken on a broad scale, these increases result in upward pressure on the cost of rental housing across the city, increasing unaffordability, and ultimately, higher eviction rates as lower income tenant households struggle to keep up with monthly rent payments on newly leased rental units.

# The impacts of the rising financialization of housing

The crisis of affordability in rental housing is associated with a diminished affordable social housing stock and to the emergence of profit-driven rental housing development through private finance.<sup>7</sup> The financialization of rental housing has spread globally over the past decade following the collapse of the sub-prime mortgage market in the United States and the global financial crisis that ensued.<sup>8</sup> During this period, multinational and other large-scale investment companies have made a concerted effort to increase investment in the residential real estate market. This has led to the current situation in which an increasing number of global corporate landlords own hundreds of thousands of rental units throughout the world.<sup>9</sup> The proliferation of corporate-owned rental housing means that rental housing is being increasingly treated as “a financial asset that is managed and traded as an investment product for finance capital”,<sup>10</sup> rather than as a fundamental human right and necessity.

The growth of purpose-built rental housing in Canada, especially in Toronto, traces its roots to the global expansion of multi-family rental housing in the post-WWII era. The construction of purpose-built rental housing and social housing in Canada increased in the 1960s and 1970s supported by sustained federal funding. However, government support for housing construction and operation began to wane in the 1980s, while at the same time private sector builders shifted away from multi-family housing towards condominium developments. Over time, these shifts severely curtailed the availability of affordable housing options in Canada and Toronto.

The decrease in government financing for the construction and maintenance of multi-family rental housing in the 1980s and 90s coincided with regulatory changes that permitted the emergence and expansion of Real Estate Investment Trusts (REITs). At the time, a combination of federal disinvestment from social housing, reduced private tenancy protections and housing deregulation facilitated the passage of new legislation in 1993 which permitted REITs to invest in the multi-family rental housing sector.<sup>11</sup> As a result, corporate ownership of multi-family rental housing accelerated in the late-1990s when the Canadian Apartment Properties Real Estate Investment Trust (CAPREIT) and the Residential Equities Real Estate Investment Trust (ResREIT) launched the first initial public offering (IPO) for investment in multi-family rental housing. Institutional investors began investing in existing multi-family rental housing by acquiring apartment buildings at a very low cost, renovating them, and increasing rents to enhance the value of their portfolios.<sup>12</sup> In this model, returns on investment are directly linked to extracting greater value from the asset (housing) by increasing rents.

Over the past 40 years, government disinvestment from housing, the growth of institutional ownership of built-to-rent and multi-family housing in Canada, and the lack of rent regulations for vacant units have been major contributing factors to the sharp decrease in rental housing affordability in major metropolitan areas.<sup>13</sup> Canadian cities lack sufficient social housing and affordable purpose-built rental housing to meet growing demand, which disproportionately affects lower income households. This means lower income populations are increasingly pushed into precarious housing, including an increased risk of experiencing eviction and homelessness.<sup>14</sup>



# The (disproportionate) impacts of eviction

Studies show that experiencing eviction can have severe negative impacts on the health and housing outcomes of tenant households who go through it,<sup>15</sup> particularly for lower income, racialized, and Black communities who experience eviction at rates disproportionate to the general renter population.<sup>16</sup> The impact of being evicted can have severe and long-lasting consequences. Tenant households who experience eviction often end up in lower-quality housing in neighbourhoods with sub-par infrastructure, public facilities, and amenities. At the community level, eviction can perpetuate cycles of poverty and instability in neighbourhoods, fostering environments where people are continuously moving in and out of rental housing that is often deteriorating or in a state of disrepair.<sup>17</sup>

The experience of eviction can have significant impacts on both mental and physical health, with effects enduring long after the eviction occurred.<sup>18</sup> Eviction often leads to medium- and long-term periods of instability that can contribute to negative mental health outcomes, including depression, anxiety, and suicide. Studies also show that experiencing eviction contributes to negative physical health outcomes including high blood pressure, poor self-reported health, and a higher prevalence of domestic violence and child maltreatment.<sup>19</sup> These health impacts can compound and contribute to persistent housing instability. Recent studies show that many individuals report poorer health years after an eviction occurred,<sup>20</sup> and that the long-term health effects of eviction can be present 8 years later.<sup>21</sup>

Eviction, or the threat of eviction, disproportionately affects members of certain socio-economic groups, and the relationship between health and eviction varies across demographic groups. Determining whether discrimination plays a role in an eviction is difficult to determine, because differential treatment and discrimination are often subtle or deliberately hidden, and most eviction filings are for reasons like non-payment of rent, even while landlords hold a lot of discretionary power over the decision to evict someone. However, the recent emergence of more detailed data on eviction has provided researchers with insight into the role that racial and gender discrimination might play in eviction. Studies show that across North America, eviction rates tend to be higher in Black neighbourhoods, where female-led households face the highest risk of being evicted.<sup>22</sup> While discrimination on the part of landlords may play a part in these types of eviction, the role of income inequality and other socioeconomic factors are likely other contributing factors.<sup>23</sup> Eviction also disproportionately affects people with addiction and substance use disorder.<sup>24</sup>

Given the size of Toronto's renter population and the far-reaching impacts that eviction has on tenant households, they constitute a major issue for the city's public health and overall social wellbeing. Eviction also impacts a city's social fabric, including social cohesion and community resilience. Even though residential eviction constitutes a major housing issue, particularly for vulnerable and equity-seeking groups, evidence-based research on the problem continues to be relatively scant and scattered across localities.<sup>25</sup> Existing data on eviction is significantly limited and mostly captures the endpoints of the legal eviction process. Further, eviction often occurs informally or outside the legal process and is undetected by policymakers and the wider public because they are not registered in administrative records.<sup>26</sup>

Despite the relative lack of evidence-based research on evictions that take place without legal proceedings, research has expanded over the past decade in North America and elsewhere as

the tenant population grows, and more people experience eviction as they struggle to keep up with rising rents.<sup>27</sup>

Public census and surveys in Canada and the United States have also begun to capture more detailed data on involuntary moves in rental housing. This information is being used by researchers to map where eviction occurrences are concentrated to capture the extent of displacements in various communities.

## Understanding informal eviction

The legal eviction process in Ontario usually begins with a landlord providing a tenant with a document called a “Notice to End your Tenancy,” which details the reasons the landlord would like to end the tenancy. The tenant has the option of moving out in response to the notice. If they do not move out, the landlord then files an application with the LTB which begins a legal proceeding. At the conclusion of the proceeding, if the LTB adjudicator finds in favour of the landlord, an order directing the tenant to vacate the unit is issued. If the tenant still does not move out, the landlord can file the eviction order with the Court Enforcement Office (Sheriff) which will attend the unit and remove the tenant on a scheduled date.

LTB statistics provide a relatively detailed picture of the numbers and types of eviction applications filed, and their outcomes. However, the statistics do not include involuntary moves that did not involve an application to the LTB. For example, they do not include cases where a tenant moved out after receiving a notice of eviction without advancing to a proceeding, where a tenant moved because a landlord asked or told them to leave without giving a notice of eviction, where a tenant moved to escape poor living conditions such as maintenance issues or harassment, or where a landlord illegally evicted a tenant by changing the locks without an eviction order.

Involuntary moves that occur without a legal proceeding – and are therefore not captured in LTB statistics – are known as an “informal eviction.” They have not been the focus of very many studies due to a lack of accurate and easily accessible data.<sup>28</sup> The relatively small amount of research and data on informal eviction shows that it constitutes a major social issue which have broad and long-lasting impacts on many individuals and their communities.

Recently, governments have begun to conduct housing surveys that include questions about involuntary moves or evictions outside of formal legal proceedings. In 2018, Statistics Canada began conducting the Canadian Housing Survey (CHS), which collects information about housing needs and experiences from a sample of Canadian households. However, the number of evictions reported in this survey may be understated because the survey was voluntary, and its overall response rate was relatively low (50%). The survey is unique in the Canadian context and provides valuable new information for understanding evictions.

The 2021 CHS questionnaire was expanded to include six questions about forced moves. Available results show that 12% of respondents who are renters reported being evicted in the past, and the most common reasons for being evicted were sale of the property (37%), landlord’s own use (26%), conflict with the landlord (13%), demolition, conversion, or major repairs by the landlord (10%) and rental arrears (8%).<sup>29</sup> More research is needed to better

understand the extent of informal evictions, as well as the negative consequences for families and individuals, as overall research to date remains quite limited on these issues. That is, understanding the process, scale and scope of informal evictions is necessary to have a broader and holistic understanding of eviction in rental housing. This is particularly the case at the local and municipal level, where policymakers could benefit from this information to ensure that appropriate housing support services, legal protections and policies are in place to support tenants while facing informal eviction and in its aftermath.

In an effort to begin understanding the impact of informal evictions in Toronto, with the support of the City of Toronto's Toronto Tenant Support Program (TTSP), the Canadian Centre for Housing Rights (CCHR) undertook preliminary research on this issue. The study aimed to understand the impact of informal eviction on tenant households and provide insights for policymakers and tenant advocates. The research was conducted through a web-based survey of people who had experienced being informally evicted, as well as through interviews with housing professionals, to assess the state of informal eviction in the city.

The survey received responses from people who currently or previously lived in a rental unit in Toronto. Results showed that out of 75 people who responded to the question "In the past 12 months have you ever involuntarily moved from your home", 50 (66.67%) of them answered "yes." The most common reasons they provided for forced moves were N12 eviction notices, which are used by landlords to reclaim rental units for their own use or for the use of their immediate family members. These were followed by notices for renovations, demolition, or conversion of properties. The survey also revealed demographic disparities in landlord issues, involuntary moves and relocation patterns.

Interviews with housing service providers indicated that eviction often occurs informally before a landlord submits an eviction application to the LTB. Tenants often move out involuntarily due to termination or eviction notices and are unaware of available housing services and supports. Language barriers, lack of knowledge about the eviction process and increased stress and anxiety contribute to tenants feeling they have no choice but to leave. Eviction notices commonly used include the N4, N5, N6, N7, N12 and N13 forms, which each have specific reasons for eviction. Maintenance and repair issues ignored by landlords, affordability challenges, and limited access to support services were also identified as contributing factors to informal evictions.

The findings highlight the need for improved tenant education, increased awareness of housing rights, and expanded access to support services to help tenants maintain their tenancy and avoid being informally evicted from their home. The study's data can assist policymakers and decision-makers in developing effective housing support services and policies. The study's conclusions also emphasize the need for further research to better understand the impact of informal eviction on the tenant population.

## Moving Forward

Research shows that increasing access to affordable rental housing by expanding social housing – public, non-profit and cooperative housing – and/or rental assistance programs could

be effective policy interventions to decrease involuntary moves and improve tenant households' likelihood of staying housed.<sup>30</sup> Deeply affordable housing, such as providing new social housing and protecting and improving the existing affordable private market supply, could reduce the number of involuntary moves, especially among low-income tenant households who live on fixed incomes and in receipt of the Ontario Disability Support Program (ODSP) and Ontario Works (OW).<sup>31</sup>

Strengthening legal protections, like requiring legal representation for tenants facing an eviction, can also help reduce eviction rates.<sup>32</sup> Many instances of eviction do not serve a legitimate purpose. For example, tenants may be evicted because of rent arrears even where they may have been able to repay the arrears, or because of other solvable issues.<sup>33</sup> Ontario law requires that the LTB consider whether it would be “unfair” to refuse eviction, but more robust protections are needed for tenants to avoid being unnecessarily evicted.<sup>34</sup>



## Endnotes

---

<sup>1</sup> Matthews-Hunter, K. (2021). Purpose-built rental housing and household formation among young adults in Canadian cities, 1991–2016. *Housing Studies*, 36(10), 1566–1599;

Pawson, H., Hulse, K., & Morris, A. (2017). Interpreting the rise of long-term private renting in a liberal welfare regime context. *Housing Studies*, 32(8), 1062–1084;

Walks, A., & Soederberg, S. (2021). The New Urban Displacements? Finance-Led Capitalism, Austerity, and Rental Housing Dynamics. *Urban Geography*, 42(5), 571–582.

<sup>2</sup> Statistics Canada. (2022). “Shelter-cost-to-income ratio by tenure including presence of mortgage payments and subsidized housing: Canada, provinces and territories, census divisions and census subdivisions.” September 9, 2022. <https://www150.statcan.gc.ca/t1/tbl1/en/cv.action?pid=9810025501>

<sup>3</sup> Statistics Canada. (2022). Census Profile, 2021 Census of Population. Profile table. September 02, 2022. <https://www12.statcan.gc.ca/census-recensement/2021/dp-pd/prof/details/page.cfm?Lang=E&SearchText=Toronto&DGUIDlist=2021A00053520005&GENDERlist=1,2,3&STATISTIClist=1&HEADERlist=0>

<sup>4</sup> Preston, G., & Reina, V. J. (2021). Sheltered From Eviction? A Framework for Understanding the Relationship Between Subsidized Housing Programs and Eviction. *Housing Policy Debate*, 31(3–5), 785–817.

<sup>5</sup> Leon, S. (2020). *Forced Out: Evictions, Race, and Poverty in Toronto*. Wellesley Institute.

<https://www.wellesleyinstitute.com/wp-content/uploads/2020/08/Forced-Out-Evictions-Race-and-Poverty-in-Toronto-.pdf>

<sup>6</sup> CMHC. (2023). *Rental Market Report*. January 26, 2023. <https://www.cmhc-schl.gc.ca/en/professionals/housing-markets-data-and-research/market-reports/rental-market-reports-major-centres>;

Government of Ontario. (2022). *Residential rent increases*. June 29, 2022.

<https://www.ontario.ca/page/residential-rent-increases>

<sup>7</sup> August, M. (2021). Financialization of housing from cradle to grave: COVID-19, seniors’ housing, and multifamily rental housing in Canada. *Studies in Political Economy*, 102(3), 292.

<sup>8</sup> August, M. (2020). The financialization of Canadian multi-family rental housing: From trailer to tower. *Journal of Urban Affairs*, 42(7), 975–997;

Byrne, M. (2020). Generation rent and the financialization of housing: a comparative exploration of the growth of the private rental sector in Ireland, the UK and Spain. *Housing Studies*, 35(4), 743–765;

Nethercote, M. (2020). Build-to-Rent and the financialization of rental housing: future research directions. *Housing Studies*, 35(5), 839–874.

<sup>9</sup> Beswick, J., Alexandri, G., Byrne, M., Vives-Miró, S., Fields, D., Hodgkinson, S., & Janoschka, M. (2016). Speculating on London’s housing future: The rise of global corporate landlords in ‘post-crisis’ urban landscapes. *City*, 20(2), 321–341;

Van Loon, J. & Aalbers, M. (2017). “How real estate became ‘just another asset class’: the financialization of the investment strategies of Dutch Institutional Investors.” *European Planning Studies* 25(2), 221–240.

<sup>10</sup> August, M. (2021), p. 290.

<sup>11</sup> August, M. (2020);

August, M., & Walks, A. (2018). Gentrification, suburban decline, and the financialization of multi-family rental housing: The case of Toronto. *Geoforum*, 89(December 2016), 124–136.

<sup>12</sup> August, M. (2020).

<sup>13</sup> August, M. (2020).

<sup>14</sup> Matthews-Hunter, K. (2021). Purpose-built rental housing and household formation among young adults in Canadian cities, 1991–2016. *Housing Studies*, 36(10), 1566–1599.

<sup>15</sup> Desmond, M. & Kimbro, R. (2015). Eviction’s fallout: Housing, hardship, and health. *Social Forces*, 94(1): 295–324;

Gold, A. (2016). No Home for Justice: How Eviction Perpetuates Health Inequity among Low-Income and Minority Tenants. *Georgetown Journal on Poverty Law and Policy*, XXIV(1): 59–88;

---

Hatch, M. & Yun, J. (2021). Losing Your Home Is Bad for Your Health: Short- and Medium-Term Health Effects of Eviction on Young Adults. *Housing Policy Debate*, 31(3-5): 469-489.

<sup>16</sup> Desmond, M. (2012). Eviction and the Reproduction of Urban Poverty. *American Journal of Sociology*, 118(1), 88–133;

Greenberg, D., Gershenson, C., & Desmond, M. (2016). Discrimination in evictions: empirical evidence and legal challenges. *Harvard Civil Rights-Civil Liberties Law Review*, 51(1), 115– 158;

Leon, S. & Iveniuk, J. (2020). *Forced Out: Evictions, Race, and Poverty in Toronto*. The Wellesley Institute. <https://www.wellesleyinstitute.com/wp-content/uploads/2020/08/Forced-Out-Evictions-Race-and-Poverty-in-Toronto-.pdf>

<sup>17</sup> Desmond, M., Gershenson, C., & Kiviat, B. (2015). Forced relocation and residential instability among urban renters. *Social Service Review*, 89(2), 227–262.

<sup>18</sup> Hatch & Yun (2021).

<sup>19</sup> Vásquez-Vera, H., Palència, L., Magna, I., Mena, C., Neira, J., & Borrell, C. (2017). The threat of home eviction and its effects on health through the equity lens: A systematic review. *Social Science and Medicine*, 175, 199–208.

<sup>20</sup> Benfer et al., (2021);

Desmond, M. (2016). *Evicted: Poverty and Profit in the American City*. New York: Broadway Books;

Hatch & Yun, (2021); Vásquez-Vera et al., (2017).

<sup>21</sup> Hatch & Yun, (2021).

<sup>22</sup> Desmond, (2012); Leon, S. & Iveniuk, J. (2020).

<sup>23</sup> McCullough, S., Sylvestre, G., Dudley, M., Vachon, M. (2023). SHUT OUT – Discrimination in the Rental Housing Market Barriers to Tenancy Access and Maintenance, Its Impacts, and Possible Interventions. Institute of Urban Studies, University of Winnipeg.

<sup>24</sup> Fleming, T., Damon, W., Collins, A. B., Czechaczek, S., Boyd, J., & McNeil, R. (2019). Housing in crisis: A qualitative study of the socio-legal contexts of residential evictions in Vancouver's Downtown Eastside. *International Journal of Drug Policy*, 71, 169–177.

<sup>25</sup> The bulk of research on evictions is focused on localities across the United States. Thanks to the efforts of urban sociologist Matthew Desmond, a significant number of studies have been conducted in Milwaukee, WI, including the implementation of the Milwaukee Area Renters Study (MARS) which served as a benchmark study for rental housing and evictions. In Canada, notable studies on evictions have largely been conducted in Toronto, including Linda Lapointe's (2004) study of evictions which was commissioned by the City of Toronto; Antony Chum's (2015) research on the impact of gentrification on evictions in Toronto; and Julie Mah's (2021) study on the impact of provincial policy on evictions in Toronto and the need for intergovernmental coordination to address them.

<sup>26</sup> Hartman, C., & Robinson, D. (2003). Evictions: The hidden housing problem. *Housing Policy Debate*, 14(4), 461–501.

<sup>27</sup> Collins, D., de Vos, E., Evans, J., Severson Mason, M., Anderson-Baron, J., Cruickshank, V., & McDowell, K. (2021). "When We Do Evict Them, It's a Last Resort": Eviction Prevention in Social and Affordable Housing. *Housing Policy Debate*, 32(3), 473–490;

Desmond, M. (2012); Greenberg, D., et al., (2016).

<sup>28</sup> Desmond, M., Gershenson, C., & Kiviat, B. (2015);

Hartman, C., & Robinson, D. (2003).

<sup>29</sup> Statistics Canada. (2022). *Evictions in Canada, 2021*. July 21, 2022.

<https://www150.statcan.gc.ca/n1/pub/11-627-m/11-627-m2022046-eng.htm>

<sup>30</sup> Lundberg, I., Gold, S. L., Donnelly, L., Brooks-Gunn, J., & McLanahan, S. S. (2021). Government Assistance Protects Low-Income Families from Eviction. *Journal of Policy Analysis and Management*, 40(1), 107–127;

Schapiro, R., Blankenship, K., Rosenberg, A., & Keene, D. (2022). The Effects of Rental Assistance on Housing Stability, Quality, Autonomy, and Affordability. *Housing Policy Debate*, 32(3), 456–472.

<sup>31</sup> Collins et al., (2021);

Harrison, A., Immergluck, D., Ernsthausen, J., & Earl, S. (2021). Housing Stability, Evictions, and Subsidized Rental Properties: Evidence From Metro Atlanta, Georgia. *Housing Policy Debate*, 31(3–5), 411–424;

Preston, G. & Reina, V. (2021).

---

<sup>32</sup> Buhler, S. (2022). *The Right to Counsel for Tenants Facing Eviction: Security of Tenure in Canada*. The Office of the Federal Housing Advocate.

[https://www.homelesshub.ca/sites/default/files/attachments/Buhler-the\\_right\\_to\\_counsel\\_for\\_tenants\\_facing\\_eviction-security\\_of\\_tenure.pdf](https://www.homelesshub.ca/sites/default/files/attachments/Buhler-the_right_to_counsel_for_tenants_facing_eviction-security_of_tenure.pdf);

Pollock, J. (n.d.). *Using Right to Counsel as an Eviction Diversion Strategy*. National League of Cities [accessed June 12, 2023]. <https://www.nlc.org/article/2021/10/26/using-right-to-counsel-as-an-eviction-diversion-strategy/>

<sup>33</sup> Canadian Centre for Housing Rights. (2023). *Secure housing for renters: Canada's obligation to protect the right to housing*. March 15, 2023. <https://housingrightscanada.com/secure-housing-for-renters-canadas-obligation-to-protect-the-right-to-housing/>

<sup>34</sup> *Residential Tenancies Act*, 2006, SO 2006, c 17, s.83.

Canadian Centre for Housing Rights. (2023). "Proportionality: A legal framework to make eviction a last resort in Canada." July 13, 2023. <https://housingrightscanada.com/proportionality-legal-framework-to-make-eviction-a-last-resort-in-canada/>



[housingrightscanada.com](http://housingrightscanada.com)