Ombudsman Toronto's Investigation into the City's Response to a Vital Services Outage in a Multi-Tenant Home

Submission to Toronto City Council

May 20, 2025

Submission by: Right to Housing Toronto



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City Clerk Toronto City Hall 100 Queen Street West Toronto, ON M5H 2N2

Dear Mayor Chow and Members of Toronto City Council,

Re: CC30.3 - Ombudsman Toronto Report: An Investigation into the City's Response to a Vital Services Outage in a Multi-Tenant Home

We are representatives of the Right to Housing Toronto (R2HTO), a network of organizations and individuals working to support the implementation of the right to housing by the City of Toronto. We are writing in response to item $\underline{CC30.3}$ regarding the Ombudsman Toronto Report, An Investigation into the City's Response to a Vital Services Outage in a Multi-Tenant Home.

Multi-tenant homes (MTH) are an important source of deeply affordable housing and provide housing to some of the most vulnerable residents in Toronto. The City's new <u>Multi-Tenant</u> <u>Houses Framework</u>, which permits licensed MTHs across Toronto, aims to protect the health and safety of tenants in MTHs through consistent standards and requirements. Ensuring that MTH tenants have ongoing access to safe and well-maintained housing is a critical way for the City to uphold its commitment to realizing the right to housing.

Through this investigation, the Ombudsman revealed that the City failed to meet the standards owed to MTH tenants under the principles of administrative fairness and the right to adequate housing. After an MTH had been damaged by fire, tenants were left without vital services, including heat and running water, for six months – leaving them in unsafe and uninhabitable conditions. Due to the City's inadequate response, which was inconsistent with its own bylaws, policies, and procedures, the tenants had to make the difficult decision to vacate their homes, move into more costly and less secure accommodations, or remain in unsafe and undignified conditions. Although the new MTH regulatory framework was not in effect at the time of the fire, nevertheless, all tenants have the right to adequate housing, including housing that is affordable, secure, and habitable.

R2HTO strongly supports the Ombudsman's report, including the 27 recommendations to help the City improve its policies and procedures, service standards, staff training and supervision, and response to vital services outages. These recommendations will help ensure that the City takes a human-rights based approach to housing by prioritizing security of tenure and habitability, preserving affordable housing units, and minimizing impacts on tenants. Importantly, staff training on the Toronto Housing Charter, especially for key divisions such as the Housing



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Secretariat's Eviction Prevention in the Community (EPIC) program and Municipal Licensing & Standards' rental enforcement unit, will help equip staff to better uphold the right to housing when developing and implementing housing policies and programs.

At the same time, it is critical for the City to ensure that the new MTH framework prioritizes and upholds the rights of tenants, including by preventing tenant displacement and ensuring MTH homes are safe and secure. This should include ongoing training and coordination across City divisions responsible for MTH monitoring and enforcement, adequate access to supports for MTH operators to come into compliance with the framework (e.g., through the MTH renovation and repair fund), and sufficient supports and protections to ensure MTH tenants have access to safe, secure, affordable housing.

We are encouraged to see that the City administration has accepted the Ombudsman's recommendations and is committed to working inter-divisionally to support their implementation. We urge City Council to follow suit by adopting the Ombudsman's recommendations and directing City staff to implement the recommendations. R2HTO welcomes ongoing opportunities to engage with the City to support implementing a rights-based approach to all of its housing policies and programs.

Thank you, On behalf of Right to Housing Toronto (R2HTO)



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