

## **Status Update: Implementation of Ombudsman's Recommendations and Council Directives on the City's Response to a Vital Services Outage in a Multi-Tenant Home**

**Date:** November 25, 2025

**To:** Executive Committee

**From:** Interim Executive Director, Municipal Licensing and Standards; Executive Director, Housing Secretariat; Executive Director, Toronto Emergency Management

**Wards:** All

### **SUMMARY**

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In May 2025, City Council adopted recommendations from the Ombudsman related to the City's response to a six-month vital services outage in an unlicensed multi-tenant house (MTH) in 2023, and provided additional directives to staff to ensure supports are in place for tenants ([2025.CC30.3](#)).

In September 2023, following a fire in a multi-tenant home, utility providers shut off natural gas and some of the electricity. Tenants called the City for assistance to restore vital services, and ten of the eleven tenants ended up moving out as the outage lasted for six months.

Addressing vital services disruptions to prevent tenant displacement, and supporting those who become displaced, is a multi-divisional collaborative effort by Municipal Licensing and Standards (MLS), the Housing Secretariat (HS), and Toronto Emergency Management (TEM). Other divisions with roles in responding to a vital service outage, uninhabitable housing, and tenant displacement include Social Development (SD), the Customer Experience Division (CXD), Toronto Fire Services (TFS), Toronto Building (TB), and Toronto Shelter and Support Services (TSSS).

The Ombudsman identified concerns over the adequacy and timeliness of the City's response and made 27 recommendations, all of which were adopted by Council. These are aimed at improving policies and procedures, staff training and supervision, and responses to vital service outages for MLS, as well as clarifying programs and improving service standards for the EPIC program. City Council provided an additional 6 directives to MLS, HS, TEM and CXD largely around supporting tenants in the event of displacement.

This report provides an update on the inter-divisional work to support the implementation of the Ombudsman's recommendations and related Council directives. City staff are working closely with the Ombudsman's Office on implementation, and all recommended actions are either completed or underway. In response to the recommendations, staff have strengthened enforcement processes, improved staff training, and are establishing stronger protocols for interdivisional coordination to better protect tenants affected by vital services disruptions.

## **RECOMMENDATIONS**

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The Interim Executive Director, Municipal Licensing and Standards, Executive Director, Housing Secretariat, and the Executive Director, Toronto Emergency Management recommend that:

1. City Council receive this report for information.

## **FINANCIAL IMPACT**

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One of the measures discussed in this report is the establishment of a formal protocol for MLS to request TEM to activate an Emergency Social Services (ESS) response for uninhabitable conditions caused by vital service outages. This may increase the number of requests for ESS activations as more cases are brought to Toronto Emergency Management (TEM)'s attention. Any increase in TEM activations would also have a corresponding impact to the number of referrals to the Housing Secretariat for rehousing case management services. This enhancement does not currently require an increase in the base budgets of TEM or the Housing Secretariat. The financial impacts of increasing ESS responses and case management services as a result of the additional protocol will continue to be measured as part of the 2010 Emergency Human Services policy review and will inform any financial impacts in a report-back to City Council in 2026.

The Chief Financial Officer and Treasurer has reviewed this report and agrees with the financial implications as identified in the Financial Impact section.

## **EQUITY IMPACT**

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Access to safe, good quality, affordable housing is an important determinant of physical and mental health, and a fundamental goal of the City's HousingTO 2020-2030 Action Plan.

Multi-tenant houses represent one of the most affordable housing options in the city, and tenants often include marginalized and vulnerable groups such as individuals with very low incomes, seniors on fixed incomes, immigrants, and students. Without access to this form of housing, many tenants could face displacement and/or homelessness and may end up relying on the shelter system.

In reviewing the Ombudsman's recommendations and internal coordination processes, City staff have identified the heightened impacts of vital service disruptions on seniors, newborn children, pregnant residents, and people with physical and/or mental disabilities or other vulnerabilities. The actions noted in this report, including improvements to referrals for emergency social services, respond to the need for targeted support for those most vulnerable.

Staff's approach to fulfilling the recommendations and directives from the Ombudsman and City Council is centred on a human rights-based approach to housing, rooted in the principle that housing is essential to the inherent dignity and well-being of a person, and to building healthy, inclusive, and sustainable communities.

## DECISION HISTORY

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On May 21 and 22, 2025, City Council adopted [CC30.3 Ombudsman Toronto Report: Investigation into the City's Response to a Vital Services Outage in a Multi-Tenant Home](#). Council directed staff to implement the Ombudsman's recommendations and provide a status update to the Executive Committee by November 1, 2025, and quarterly thereafter. Council also directed staff to report on a variety of topics, including remedial action for vital service requests, how vital service issues are reported to 311, description of previous housing case management supports organized by the City, actions taken regarding the MLS staff involved in the incident, and recommendations to support multi-tenant house tenants in the event of unexpected closures and/or circumstances that may render their home uninhabitable.

On April 23 and 24, 2025, City Council adopted [PH20.2 Implementation Guidelines for Rental Replacement](#). As part of the report approval, Council directed the Executive Director, Housing Secretariat, in consultation with tenant organizations and Councillors, to report to the Planning and Housing Committee prior to January 23, 2026, on a review of the adequacy of funding for the Tenant Support Program, including, increasing access to pro bono legal representations, defending tenants from above guideline rent increases, and advocacy support.

On July 24 and 25, 2024, City Council adopted [GG14.17 - Non-Competitive Contract with Canadian Red Cross for Emergency Social Services](#). Council authorized the Executive Director, Toronto Emergency Management to negotiate a service agreement with the Canadian Red Cross for the provision of Emergency Social Services. The report sought approval from City Council to spend up to \$3,000,000 per year for these services, an increase from the previously approved \$1,500,000 for the period spanning from 2020 to 2024.

On December 14 and 15, 2022, City Council adopted [CC2.1 - 2023 Housing Action Plan](#) and directed staff to report back by March 2023 with a set of recommendations to support tenants in the event of required emergency relocations and/or unit closures.

On December 17 and 18, 2019, City Council adopted, with amendments, Item [PH11.5 – HousingTO 2020-2030 Action Plan](#) as a strategic framework to guide the City's housing and homelessness work over the next 10 years. Council also adopted a revised Toronto

Housing Charter – Opportunity for All, which recognizes that housing is essential to the inherent dignity and well-being of the person and to building sustainable and inclusive communities. Through adoption of the Charter, Council supported the progressive realization of the right to adequate housing that is recognized in international law, within the City's capacity.

On May 11 and 12, 2010, City Council adopted Item [EX43.3 - Caring for Toronto Residents Displaced as a Result of Neighbourhood Emergencies: Review of Recent Events and Proposed Strategies](#), which included the Emergency Human Services Policy to guide the provision of emergency supports for Toronto residents impacted by emergencies, including tenants displaced from their homes due to fire and other incidents.

## COMMENTS

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### Introduction and Purpose of Report

This report provides a status update on the implementation of the Ombudsman's recommendations and Council directives related to the City's Response to a Vital Services Outage in a Multi-Tenant Home.

The Ombudsman's investigation identified concerns over the adequacy and timelines of the City's response and outlined various process and service gaps. Staff conducted a review of current processes for vital services investigations, referrals to other divisions, and assessments of eligibility for support programs to identify gaps and determine the work required to address gaps with formal protocols.

Gaps identified by the Ombudsman included inconsistencies in enforcement processes and procedures; lack of consistent oversight and supervision of enforcement staff; inadequate staff training; and insufficient longer-term displacement prevention/re-housing supports and referral pathways for tenants. In addition, through additional directives to staff, City Council identified that the City's supports for multi-tenant house tenants living in uninhabitable housing must be strengthened to prevent tenants from falling through the cracks.

### Background

#### *Ombudsman Toronto's Investigation of Vital Services Outage*

As summarized in the [Ombudsman's report](#), after a fire broke out in a multi-tenant home in the north-west part of the city in September 2023, utility providers shut off natural gas and some of the electricity, leaving tenants without heat or hot water, and tenants on one floor without power. The tenants in this case were at high risk of housing insecurity because they had few housing alternatives, given they had low incomes and were working low wage jobs or relying on social assistance. The outage lasted six months and resulted in ten of the eleven tenants moving out.

The situation was brought to the attention of Ombudsman Toronto, and on June 5, 2024, the Ombudsman launched an investigation. The investigation was completed, and a report was brought forward to City Council in May 2025, with the Ombudsman finding that the City's response was inadequate and did not follow appropriate and established procedures. The full details of the incident, the investigations and the Ombudsman's recommendations can be found in the Ombudsman's report to Council ([2025.CC30.3](#)).

### *Multi-Tenant Houses Framework*

A new regulatory framework for MTHs came into effect on March 31, 2024, which introduced a city-wide zoning approach to permit multi-tenant houses in all areas of the city, a new licensing bylaw, and a phased, interdivisional approach to licensing and enforcement, including a dedicated team of staff. This framework was not in place at the time of the incident investigated by the Ombudsman.

Staff will provide an update on the implementation of the MTH framework through a separate report to the Planning and Housing Committee in December 2025. The report will also address two Council directives requested as part of [2025.CC30.3](#), as they were specifically focused on MTHs.

### **Roles of City Divisions**

The Municipal Licensing and Standards Division (MLS) is responsible for enforcing bylaws that regulate vital services in rental units, including:

- The **Vital Services Bylaw** (Chapter 835, Vital Services, Discontinuance of), which requires landlords to provide vital services (where the landlord is responsible for obtaining and maintaining those vital services) and prohibits landlords from ceasing to provide them.
- The **Heating Bylaw** (Chapter 497, Heating), which requires a landlord to ensure that a minimum temperature of 21°C is maintained in all areas of dwelling units from October 1 to May 15.
- The **Property Standards Bylaw** (Chapter 629, Property Standards), which requires an owner to maintain their property in accordance with the standards in the bylaw and eliminate any unsafe conditions, including keeping a heating system in good repair and connected to an operating electrical supply system.

A vital service disruption may be the result, in whole or in part, of a fire and/or other structural building issue. Toronto Building (TB) is responsible for ensuring compliance with the Ontario Building Code Act and for taking timely and appropriate action when issues related to structural sufficiency are identified. Toronto Fire Services (TFS) enforces and inspects for fire safety requirements under the Fire Protection and Prevention Act.

The City may take enforcement action where properties are not properly maintained in accordance with City bylaws, including vital services. In these cases, MLS may issue orders and lay charges, but the City would not directly require a building to be evacuated in these circumstances.

Displaced tenants without alternative accommodation options (such as family members able to temporarily house them), particularly those with low-incomes or other vulnerabilities, face limited options. The City's ability to support displaced tenants is limited by challenges across the housing system, including inadequate incomes and social assistance rates, an unaffordable rental market, and high demand for emergency shelter space.

The approach that best supports tenants and is most cost-effective is to prevent displacement by enforcing bylaws that require landlords to maintain safe, quality homes for renters. Where displacement cannot be prevented, upstream collaborative work across divisions and community partners can ensure appropriate plans and supports are in place for displaced tenants.

### *Emergency Social Services (ESS) and the Emergency Human Services Policy*

Toronto Emergency Management (TEM) delivers Emergency Social Services (ESS), offering temporary essential services to individuals and families displaced in an emergency. The type, scope and length of services provided by the City to residents displaced in emergencies are outlined in the Emergency Human Services Policy adopted by City Council in 2010. The policy guides emergency response and services for both large and small-scale emergencies, with services adjusted based on the scale and nature of the emergency.

Toronto residents without personal resources, including insurance, are eligible to receive ESS when displaced in an emergency. Non-residents of Canada (e.g., visitors, visitors on approved visas, and sponsored refugees) must follow the conditions of their entry to Canada, including proof of personal resources and thus may not qualify for ESS. The range of supports available through ESS are designed to address immediate needs, including temporary accommodation, food, clothing, transportation, and personal services (e.g., hygiene products). ESS is intended to provide support for up to 14 days following the emergency incident. After 14 days, households that meet assessed low-income criteria may be eligible for continued accommodation and related supports, if required.

Prior to the Ombudsman's investigation, an official order to close a building and subsequent notification to TEM from Toronto Fire Services or Toronto Building was the trigger for an ESS response. The interdivisional working group tasked with addressing the Ombudsman and Council directives worked collaboratively to identify gaps and establish solutions that could immediately resolve some of the issues brought to light by the investigation. One such solution was the creation of a formal protocol for MLS to request TEM to activate an ESS response in cases where a building has not been officially ordered to close but where MLS has determined that a vital service disruption, in the context of the season and resident vulnerabilities, has rendered the home uninhabitable. This new formal protocol would apply to situations where a vital service disruption leaves residents without heat in winter, for example, and addresses a gap identified in the Ombudsman's investigation.

### *Eviction Prevention in the Community (EPIC)*

Housing Secretariat's Eviction Prevention in the Community (EPIC) program provides eviction prevention case management services to low-income households in Toronto who are at imminent risk of eviction. Its primary objective is to help tenants remain housed and avoid homelessness by offering tailored supports that address the specific challenges faced by each household. These supports include landlord mediation, referrals to community legal services, guidance and accompaniment at Landlord and Tenant Board (LTB) hearings, assistance in securing income supports, and connections to other tenant-focused services and resources.

In addition to its core eviction prevention mandate, EPIC delivers housing recovery case management services through an interdivisional protocol with Toronto Emergency Management (TEM). These services are designed to support tenants who have been displaced or evacuated due to emergencies or localized incidents, such as fires. Since October 2022, EPIC has assisted households referred through TEM by helping them return to their original homes or secure interim or permanent housing. These supports are provided while residents are in temporary accommodations, typically hotels, for more than 14 days, through TEM's Emergency Social Services (ESS) program. After 14 days, households that meet the assessed low-income criteria will be eligible for continued accommodation and related supports, if required. TEM authorizes the extension in consultation with EPIC to enable their continued work with the affected household. This type of support can reduce reliance on the City's overburdened shelter system and help promote long-term housing stability.

City Council requested a description of previous case management work undertaken by Woodgreen Community Services ("Woodgreen") and which is now delivered by EPIC. This information is provided in Attachment 1.

### *Situation Table for Housing-at-Risk (STAR)*

In July 2025, the City launched the Situation Table for Housing-at-Risk (STAR), a city-wide initiative supporting tenants and residents facing acute risks and requiring coordinated, multi-agency intervention to serve vulnerable populations, particularly in multi-tenant housing and renoviction scenarios.

The STAR table is comprised of representatives from over 40 City divisions and external community partners, and functions as a service coordinator for situations referred to the table. Representatives can bring complex cases to the table that have been assessed by STAR co-chairs as potentially meeting the threshold of acutely elevated risks. Upon confirmation of eligibility, an individualized plan is developed leveraging the resources of partner agencies, with case coordination provided by City staff.

STAR is not an emergency response service and is not intended to provide case management supports during a crisis. STAR provides medium and long-term support to complex cases that require extensive coordination and partnership across agencies and is best mobilized as part of an upstream intervention to prevent displacement or crisis, or to continue support once the immediate emergency of a displacement has passed.

## **Status Update on Ombudsman's Recommendations**

In response to the findings and recommendations in the Ombudsman's report, staff are implementing improvements to the City's processes for responding to vital services outages, reviewing and updating relevant policies and standard operating procedures, enhancing staff training and management oversight, updating EPIC policies and protocols, and ensuring City supports are available for tenants at risk of displacement due to vital service disruptions. A summary of the status of each recommendation is provided in Attachment 2.

### *Establishing New Processes for Responding to Vital Services Requests*

As noted in the Ombudsman's report, MLS did not conduct a proper investigation and did not follow established policies and procedures in the incident. MLS acknowledges that its actions fell short of expectations, accepts responsibility for these shortcomings, and is committed to meeting all case management standards to ensure fair and consistent enforcement.

New processes have been introduced within MLS to ensure that all vital service requests are reviewed, investigated and responded to in a timely and appropriate manner, with consistent management oversight.

Since November 2024, daily reports on all vital services service requests are generated and circulated to relevant MLS management teams to ensure prompt responses as requests are received. Supervisors and Managers are responsible for reviewing the reports, providing status updates, and following up on any required actions.

In December 2024, MLS introduced more stringent timelines for responding to vital service outages as part of the Division's Priority Response Model. The timeline for making initial contact was changed from no later than 24 hours to as soon as possible, and the timeline to attend the location was changed from between 24 and 48 hours after the service request is received to no later than 24 hours.

In April 2025, a Vital Services File Review Checklist was created and implemented for all MLS staff who enforce the Vital Services Bylaw. The checklist ensures thorough documentation and review of the BEO's investigation for every vital services file, including tenant engagement activities and referrals to other City divisions/agencies. Supervisors are required to complete the checklist and provide feedback to the BEO throughout the investigation. The assigned Manager monitors the case file and signs off at the completion of the investigation.

Additional actions have also been taken to improve oversight and accountability of enforcement staff:

- Internal guidelines have been introduced for conducting effective monthly one-on-one meetings between Supervisors and BEOs;
- A Work Audit Form was implemented in August 2025 that requires Supervisors to conduct an audit of a BEO's memo book, case files, workload/to-do lists, and provides constructive feedback where required; and



- A divisional reporting dashboard has been created to provide metrics to Managers to support file reviews and workload monitoring for each BEO.

In November 2025, additional reports were implemented to improve visibility of all Priority 1 service requests. A new report that identifies all Priority 1 service requests and their status was created to track how long each service request remains open. The report is auto-generated daily and is sent to all Managers and Directors to ensure BEOs are adhering to established timelines for response. Any service requests identified in the report that have exceeded the prescribed timelines for response are captured in a Priority 1 Escalation Report, which is sent to all Directors and the Executive Director to alert them of any unresolved service requests that require urgent follow-up.

### *Revising Standard Operating Procedures (SOPs)*

A large component of MLS' response to the Ombudsman's recommendations involve reviewing and updating existing Standard Operating Procedures (SOPs), which are foundational documents developed to provide consistent, step-by-step guidance to staff on how to perform their duties.

These updates were crucial to ensuring clear and detailed procedures to enable BEOs to investigate service requests consistently, efficiently, and appropriately. Comprehensive changes to SOPs are complete and/or underway, with all initial updates to be finalized by the end of the year with the Ombudsman's Office.

As recommended by the Ombudsman, SOPs were amended to:

- Reference MLS' Bylaw Compliance and Enforcement Policy in all of MLS' enforcement-related SOPs and include an updated Equity Lens Statement in relevant procedures;
- Clarify when investigation results are to be communicated in writing to complainants;
- Outline the procedure for dealing with the discontinuation of vital services due to repairs or alterations;
- Outline the process for responding to vital services shut-offs ordered by utility providers;
- Add contacts/liaisons for utility service providers (e.g., Toronto Hydro, Enbridge, Enercare, and Toronto Water) and guidelines on when staff should contact them; and
- Add reference to the new Vital Services File Review Checklist.

MLS staff participated in a workshop in September 2025 with the Ombudsman's Office to review MLS' SOPs for impacts on the right to adequate housing. In that workshop, the Toronto Housing Charter (THC) and the right to adequate housing in the MLS context was reviewed, and a list of guiding questions were provided to MLS to assist in the process of revising SOPs in alignment with the THC. Following the workshop, a working group comprised of staff from various MLS service areas was assembled to undertake an in-depth review of the specified SOPs through a right to adequate housing lens.

### *Improving Staff Training*

MLS has placed additional focus on improving and enhancing training delivered to enforcement staff to ensure they are properly trained in the Vital Services Bylaw, relevant procedures, and the City's housing principles.

Annual online training is required for all MLS staff and includes a review of the Division's relevant policies and procedures. This year, all BEOs completed refresher training on select SOPs governing their roles, duties, and day-to-day responsibilities. In September 2025, dedicated training on the Vital Services Bylaw was developed and launched, and all enforcement staff are required to complete it by the end of the year.

The City also committed to adopting a human rights-based approach to housing through the HousingTO 2020-2030 Action Plan and the Toronto Housing Charter. To advance this work, City Council adopted a series of recommendations ([2022.EX34.7](#)) including direction to the Housing Secretariat to procure and implement a training program for senior leaders and policy and program staff in housing-related City divisions, agencies and corporations to apply a human rights-based approach to their work. Following a competitive procurement process, the Canadian Centre for Housing Rights (CCHR) has been selected to develop and deliver this training program for policy and program delivery staff in housing-related divisions, agencies and corporations. The CCHR has extensive experience preparing and delivering human rights-based approach to housing training to a variety of audiences, including Ontario municipalities, and has prepared toolkits and resources to support the implementation of the progressive realization of the right to adequate housing. CCHR will develop a customized training program for Toronto staff in consultation with a range of City divisions and will begin engagement with MLS in Q4 2025. The training program is expected to be developed in Q1 2026 and training will begin with staff in MLS and EPIC in response to the recommendations of the Ombudsman and City Council.

As a separate action, in 2024, MLS leadership received presentations from the Housing Secretariat on tenant rights and the Residential Tenancies Act, the HousingTO Action Plan, Toronto Housing Charter and human rights-based approach to housing, and renter-focused programs, including the EPIC Program.

### *Updates to EPIC Policies and Protocols*

The Ombudsman found that EPIC's policies and protocols were unclear and/or inadequate, including program criteria and the protocol with TEM to provide housing supports to displaced tenants through TEM's Emergency Social Services policy.

The EPIC program is being revised, in consultation with Ombudsman Toronto, to improve program clarity and transparency. EPIC is reviewing its policies and practices to establish and document: i) a clear program model, including available services, ii) program eligibility, iii) service standards, and iv) review and appeal processes. The policies and procedures will be finalized in Q4 2025, following further consultation with Ombudsman Toronto.

A critical element of this work has been the establishment of a policy that documents the process and services delivered by EPIC through the Toronto Emergency

Management's Emergency Social Service (ESS) protocol. When an ESS response is activated by TEM, EPIC receives communication from TEM and its contractor, the Canadian Red Cross, within 72 hours. Within two days, EPIC makes direct contact with the displaced household and initiates a needs assessment and housing plan appropriate to the household, focused on re-occupancy, alternative interim accommodation, or permanent new housing.

Under the TEM-EPIC protocol, EPIC supports households by facilitating access to legal, health, and social services, as well as financial assistance to address immediate needs. The case plan is primarily focused on housing, including supports required to return the tenant to their home or to find and secure permanent or interim housing. This support includes assistance with housing searches, landlord engagement, submitting rental applications, accessing eligible funds for rental deposits, sourcing household items, and connecting with community agencies for on-going support.

Through the TEM-EPIC protocol, TEM coordinates weekly meetings with EPIC and the Canadian Red Cross to monitor progress and support timely, coordinated service delivery. On average, two-thirds of households either return to their original home or secure permanent housing within 60 days. Approximately one-third of households require extended periods of temporary accommodation and case management support due to factors including physical and/or mental health issues, inadequate income, and a limited supply of affordable housing units.

### **Status Update on Additional City Council Directives**

In consideration of the Ombudsman's report, City Council provided an additional six directives to MLS, HS, and TEM, notably to provide additional supports to displaced tenants and to develop recommendations for new supports for MTH tenants. These include consideration of emergency temporary accommodations for displaced tenants, bylaw changes, creation of new programs, and funding for existing supports. A summary of actions to fulfill Council directives is provided in Attachment 3.

### ***Vital Services 311 Intake and Data-Driven Escalations***

Currently, a resident facing a vital service disruption, health hazards, fire safety issue, or structural issue in their home may contact 311 for initial support. The resident's service request is then routed to the appropriate division for investigation on any potential violations.

Vital services, such as no water, heat or electricity, are critical to residents' health and safety. 311 receives related concerns on behalf of MLS, provides a service request number and timeline for first contact, and MLS responds based on a priority response model. Customers can follow up by phone or track requests online. When no water, heat or electricity are reported, it automatically triggers a Priority 1 flag to MLS, requiring MLS to contact the complainant and investigate within 24 hours.

City Council requested that staff clarify how no heat, no power and no water was reported out by 311 as "Property Standards and Maintenance Violations" during the outage. At the time of the May 2025 Ombudsman's report, vital service requests were

submitted under the “Property Standards and Maintenance Violations” service request, which reflected how information was organized in the backend database system. As a result of the Ombudsman’s report, the Customer Experience Division (CXD) and MLS are implementing a series of improvements to streamline the intake and escalations process for vital services-related requests, ensuring they are easier to find and properly directed, including designing a specific service request category for vital services. These improvements include:

- **Staff Coaching for 311 Customer Service Representatives (Complete: June 2025):** 311 customer service representatives received refresher coaching for submitting Vital Services requests.
- **New Vital Services Service Request Category (Complete: October 2025):** CXD and MLS have introduced a new service request category for vital services, with a plain language title, across all intake channels (self-serve portal, mobile, app, and phone). This will improve visibility and make it easier for residents and customer service representatives to report service requests for vital services and ensure they are treated separately than other Property Standards and Maintenance Violations.
- **311 Knowledge Base Update (Complete: October 2025):** Updated guidance will help 311 customer service representatives clearly explain the MLS enforcement process, support callers reporting service loss, and ensure vital services requests are appropriately directed.
- **Active Monitoring & Data-Driven Escalations of Vital Services Service Requests by 311 (to be completed by the end of 2025):** To strengthen accountability and support timely action on critical resident concerns, CXD is working with MLS to develop a more proactive, data-driven escalation process for vital services requests, including heat, water, and electricity issues.
  - While Priority 1 service requests are already prioritized by MLS, the new process adds additional escalation triggers by CXD for MLS review and action. Using targeted data triggers and monitoring, CXD will escalate flagged cases to MLS management and, in some cases, to the Deputy City Manager’s Office.
  - Once escalated, CXD will work with MLS to track progress and communicate updates to affected residents.

In addition, CXD and MLS are partnering on several related initiatives to enhance the intake and communications processes for service requests, including:

- **Automated Escalations Triggers (Target Q4 2026):** To enhance CXD’s escalation process, CXD will be working to design automatic pattern recognition within CXD’s customer relationship management system to automatically flag multiple Priority 1 service requests, recurring Priority 1 service requests, and late Priority 1 service requests for management in CXD, partner divisions and the appropriate Deputy City Managers’ offices.
- **Improving Communication Between MLS, CXD and Customers (2026-2027):** CXD and MLS are working together to improve the quality of notes and information shared by MLS when a service request’s status is updated, through the Closing the Loop initiative. This will ensure customers receive more timely and accurate information when the status of their service request is changed.

## *Options and Considerations for Undertaking Remedial Action*

As part of Item [2025.CC30.3](#), Council requested that staff outline considerations for undertaking remedial action and engage a roster of contractors who could carry out emergency repairs, mold and pest abatement, and other remediation to restore vital services in a timely manner.

Remedial action is an enforcement tool available to address non-compliance with City bylaws. Where the City has found non-compliance with a bylaw and taken enforcement action such as issuing orders, the City may retain a contractor to undertake repair work, to the satisfaction of the City, to address the continuing non-compliance. Costs of the work are recovered by the City, often by adding them to the property owner's property tax bill. While the process may differ depending on the bylaw being enforced and its underlying enabling legislation, remedial action is not a mechanism that can be used immediately to respond to non-compliance, as remedial action generally occurs only after an order has been issued and the order has not been complied with. As a result, MLS generally uses remedial action in conjunction with, or after all other enforcement options have been exhausted.

Whether remedial action is undertaken is an enforcement decision. When making decisions about enforcement actions, staff must consider the relevant legislation, what authority staff have to take that action, and relevant SOPs. Once BEOs determine the permitted tools and relevant procedures, they use their discretion within a progressive enforcement framework to determine the tool that will achieve compliance most effectively. BEOs consider different factors depending on the circumstances, including the seriousness of the violation, the impact of the violation on public safety, the likelihood of the person to repeat the violation, and the impact of the enforcement activity on the tenants, property owner, community and/or business. The equity of an enforcement action is also considered, meaning that BEOs consider a person's circumstances and the timeline given to comply.

MLS currently has several blanket contracts for building repairs, waste removal, boarding/fencing/draining of stagnant water, cutting of long grass, and graffiti removal. MLS also has the ability to use blanket contracts held by other City divisions to undertake required emergency repairs including roofing, HVAC installation and maintenance. In 2026, MLS will procure contractors for pest abatement (Q2 2026) and mold remediation (Q3 2026), through a competitive request for quotation (RFQ) process.

If remedial work requires a contractor that is not covered under the scope of any current corporate contracts, the City's Procurement Policy enables divisions to issue Divisional Purchase Orders (DPOs) to retain contractors, through a competitive 3-quote process. In the past, MLS has secured vendors for mold and asbestos remediation, locksmith services, and pest control through the DPO process and would follow the same processes to secure any contractors, where required.

As directed by Council through item [2024.PH11.8](#), MLS is currently reviewing the conditions under which remedial action can be used across all of the bylaws enforced by the Division, aiming to understand the operational and financial impacts of altering

current processes and communicate consistent standards. This review will consider whether additional contracts are required to enhance MLS' ability to undertake remedial action and will establish a framework to guide MLS' bylaw officers in the application of remedial action in consideration of the circumstances and context of each specific case. The framework will specifically identify when remedial action is appropriate in vital service cases and consider where remedial action could have an immediate positive impact on occupant well-being and reduce costs to the City. In addition, MLS staff will be reviewing the framework with the lens of the right to adequate housing and in alignment with MLS' priority response model. The results of this review will be included in a report back to Council in Q2 2026.

### *Enforcement Staff Involved in the Investigation of the Vital Services Outage*

As part of item [2025.CC30.3](#), City Council requested information on what steps were taken with the manager, supervisor and bylaw enforcement officer (BEO) involved in the investigation. MLS took corrective action with the staff involved to address the concerns identified in the report, including the following:

- Staff assignments were realigned, including removal of acting positions;
- The staff are receiving enhanced performance oversight, which includes regular debriefs with management and review of their files and development plans;
- In June and July 2025, the staff received formal communications regarding expectations of their respective roles; and
- The staff were required to review applicable and revised SOPs and complete the newly developed training on the Vital Services Bylaw.

### *Enhancing Future Accountability Within MLS*

Expectations around operational oversight of the division have been clearly articulated by senior leaders to MLS management.

New and existing management within MLS, including the recently appointed Interim Executive Director and Director (who have direct oversight of the MTH team), have reviewed this incident closely and are committed to supporting culture change within the Division as well as ensuring staff apply a human-rights based approach and recognize the disadvantages faced by equity-seeking groups and vulnerable populations, including tenants of rental housing such as multi-tenant houses.

### *Additional Directives from City Council*

Staff have made progress on additional Council directives, including the following:

- As requested by Council, as is existing practice, if there are bylaw violations occurring solely in common areas of a building, staff may issue a Notice of Violation or Order to Comply separate from any notices or orders related to in-suite issues.
  - In addition, BEOs will support tenants, where applicable, to initiate a work order with their landlord regarding potential in-unit violations.

- As requested by Council, beginning in 2026, staff plan to provide an annual report, available to the public, on Multi-Tenant Housing enforcement and licensing activities, similar to existing reports that are published annually for the [RentSafeTO program](#).

## **Ensuring City Supports are Available for Tenants At-Risk of Displacement due to Vital Services Disruptions**

As described above and in previous reports to Council ([2024.PH10.2](#)), City divisions have protocols in place to support tenants of multi-tenant houses who are displaced from their homes either in response to sudden emergencies (such as fire) or when building safety conditions are so severe the property is ordered to be evacuated and closed. In such instances, TEM's ESS program is activated to provide temporary accommodation and support, which subsequently engages the EPIC program to provide housing recovery case management services.

Through item [2025.CC30.3](#), City Council directed staff to report back by the end of 2025 on the availability of emergency temporary accommodation, bylaw changes, creation of new programs, and any associated funding requirements to support multi-tenant house tenants facing displacement or in circumstances that render their homes uninhabitable. This section of the report provides a response by outlining improvements that have been made since the Ombudsman's report was adopted and indicates future work to continue addressing Council direction and support tenants at-risk of displacement. In developing these improvements, staff also considered the Rooming House Emergency Response Plan (2005), as recommended by the Ombudsman.

The displacement of residents from their homes is the last resort where uninhabitable circumstances have created an immediate threat to life or safety, and cannot be addressed by other City services, including internal process improvements such as enhanced follow-up and engagement with the property owner.

There are several potential Toronto Municipal Code violations, provincial act violations, and associated legislation where the physical structure of a dwelling could be interpreted as uninhabitable (including a fire, structural issue, or a health hazard or vital service disruption) and/or that might lead the City to request the closing of a premises. Determining habitability also requires considering building conditions alongside other specific factors such as the vulnerabilities of resident(s), as well as the season (i.e., heat in winter).

To address Council direction, MLS and TEM have established new protocols to enable activation of the ESS program, including temporary accommodation and basic needs supports, where vital services disruptions render homes uninhabitable. The focus of this activation is on supporting vulnerable tenants where: (i) efforts have been made to remedy the vital service disruption; (ii) interim measures to ensure habitability are not available; and (iii) the disruption is not expected to be resolved quickly. As described above, activation of the ESS program also triggers activation of the EPIC team to provide housing case management and other supports to displaced tenants. This protocol expands eligibility of ESS beyond the previous model, where an evacuation order was the primary trigger. Staff will continue to assess this protocol as part of a

review of the 2010 Emergency Human Services policy and the Emergency Social Services (ESS) program, targeted for completion in 2026.

Earlier collaboration across divisions can help put tenant supports in place before displacement occurs or circumstances in the home worsen. To address the need for earlier engagement, the following measures have been implemented:

- Introduction of early notification and enhanced communication across divisions in situations of potential displacement arising from imminent or ongoing vital services disruptions.
- Activation of STAR to assess the need for coordinating a range of community and City service supports for tenants at-risk of displacement, with a focus on complex cases.
- In cases that do not meet STAR vulnerability thresholds, tenants are connected to housing-focussed resources delivered by tenant support providers or Housing Hubs.

These new measures will work in tandem with changes to the Vital Services SOP made by MLS to continue engagement and enforcement action with landlords on the restoration of vital services and, where services cannot be restored, the provision of temporary services.

As a result of the formal pathway for MLS to activate TEM's ESS program in instances of vital services disruptions, staff anticipate there may be increased demand for housing case management services delivered by EPIC through the protocol with TEM. In addition, enhanced collaboration prior to potential tenant displacement of potential tenant displacement may increase demand for housing supports and/or coordination across divisions to support tenants.

The Housing Secretariat has identified existing staff resources to support additional case management services for tenants who are displaced due to a vital services disruption and activation of EPIC through TEM. Actual demand for these supports is not known at this time. Past trends may not be a useful indicator of future tenant displacement, as MLS has significantly strengthened vital services disruption enforcement processes as outlined in this report. Staff will monitor service demand and tenant outcomes to inform future program and process improvements aimed at protecting tenants.

## **Conclusion and Next Steps**

Addressing vital services disruptions as quickly as possible is the most effective way to prevent tenant displacement. Toronto is experiencing a housing and homelessness crisis, with shelters over capacity, insufficient affordable rental housing supply, and rents that continue to outpace income growth and social assistance rates. The preservation of existing affordable housing and prevention of eviction and displacement are city-wide priorities that support tenants, advance the progressive realization of the right to adequate housing, and represent a cost-effective response to risks of homelessness. These priorities are being advanced through the implementation of the Ombudsman's recommendations and Council's direction.



Staff will continue to collaborate with the Ombudsman on implementation of relevant recommendations and directives and to advance outstanding actions that are underway. To date, approximately 50% of the Ombudsman's recommendations and Council directives have been fulfilled, with 40% on track to be completed by the end of 2025. Per direction from City Council, staff will provide frequent status updates to the Executive Committee, including outcomes of the actions summarized in this report, and aim to report to the Housing Rights Advisory Committee by Q2 2026.

To address the need for an updated Emergency Human Services policy that considers the current housing environment and resident vulnerabilities, TEM is conducting a comprehensive program and policy review. This includes the 2010 Emergency Human Services Policy and the Emergency Social Services program, with completion targeted for 2026. The review will identify the most appropriate supports for residents displaced in these situations.

In early 2026, and in tandem with TEM's review of the Emergency Social Services program, the Housing Secretariat will be reviewing opportunities to better leverage the Toronto Tenant Support Program and other services to support tenants at-risk of displacement, due to uninhabitable housing conditions.

## **CONTACT**

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## **SIGNATURE**

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## **ATTACHMENTS**

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Attachment 1 – Additional Background (MLS' Priority Response Model and Vital Service Outage Data, EPIC Data, and WoodGreen Community Services)

Attachment 2 – Summary of Actions – Ombudsman's Report

Attachment 3 – Summary of Actions – Council Directives