

## EX28.2 - 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

*Submission by Melissa Goldstein, member of the MTH Advocacy Group.*

With the City ramping up enforcement of new MTH licensing requirements, it is more important than ever that vulnerable MTH tenants are able to access supports that include:

- crisis intervention/emergency displacement prevention services;
- tenant rights education and resource information (for high-functioning tenants);
- emergency relocation support; and
- advanced level, instrumental eviction prevention and rehousing supports (for higher needs tenants).

While the City has been improving the services available to MTH tenants, there are still very serious gaps. And unless the gaps are filled, increased enforcement of MTH license requirements will necessarily produce a dramatic increase in homelessness (much of it preventable), right as we head into the next municipal election.

### **Recommendations:**

1. **Eliminate the restrictions on Emergency Social Service response eligibility to ensure equitable access to emergency services and ensure all protocols are updated appropriately.**
2. **Improve the City's response to all issues that can render homes uninhabitable, learning from improvements to the City's response to vital service disruptions.**
3. **Create and properly resource public-facing/publicly-accessible emergency support services for MTH tenants that include emergency eviction prevention intervention support and intensive case management rehousing support for higher needs MTH tenants, either by expanding the Toronto Tenant Support Program or by expanding EPIC.**
4. **Increase funding to the Toronto Tenant Support Program to fund a team of MTH outreach workers to ensure adequate service levels.**

The Multi-Tenant Housing (MTH) Advocacy Group has been persistently raising concerns with City staff and Councillors for several years now about the lack of supports for tenants facing sudden or imminent displacement, as increased enforcement of MTH licensing requirements puts tenants at greater risk of displacement by landlords. While it's encouraging to see the significant changes being made at the City in response to the Ombudsman's report to ensure that vital services outages are better managed and tenants are better supported in the event of an emergency, there are still significant issues related to **access** to emergency services and **displacement prevention** that must be addressed.

The staff report details how the City handles a number of situations where tenants are displaced from their homes: fire, evacuation order by Toronto Fire or Toronto Building, or a vital service outage that won't be repaired for awhile where MLS deems the housing uninhabitable. In these situations, Toronto Fire, Toronto Buildings or MLS contact Toronto Emergency Management (TEM), which triggers an Emergency Social Service (ESS) response.

While this expansion of situations that triggers an ESS is welcome, there are a number of other issues that can render homes uninhabitable like a flood, sewage backup, or a roof caving in, and they should require a priority one flag by 311, and should also trigger an Emergency Social Service response, but don't, unless an evacuation order is issued by the City. Staff should modify their response to all issues that can render homes uninhabitable, not just those that are the focus of the Ombudsman's investigation.

The staff report states that the ESS response is provided as per the Emergency Human Services Policy adopted by Council in 2010 and through a contract with the Canadian Red Cross. However, the report also states that only Toronto residents without personal resources, including insurance, are eligible to receive ESS when displaced in an

emergency, and that this may exclude non-residents of Canada including visitors on approved visas and sponsored refugees if their entry to Canada required proof of personal resources.

The Emergency Human Services Policy has no such restrictions on eligibility, the Canadian Red Cross has a clear [policy](#) of providing assistance to “anyone who needs it,” and denying people access to emergency human services is not consistent with the Right to Housing, so it’s unclear where this restriction on who can access support in an emergency came from and why it is considered acceptable. No matter how many resources a person has, that person may still need help with emergency relocation and rehousing supports. In particular, having an insurance policy does not ensure that a person can access clothes, food, or a safe place to sleep at 3am after their home has just burned down, which is precisely why emergency services exist.

The report provides information about what services Woodgreen offered that are now delivered by EPIC (in Attachment 1, as directed by Council). EPIC does provide displaced tenants a lot of the same services that Woodgreen offered: they facilitate access to legal, health, and social services, provide financial assistance to address immediate needs, and provide support to help a tenant return to their home or find and secure permanent or interim housing, including helping with housing searches, landlord engagement, submitting rental applications, accessing funds for rental deposits, sourcing household items, and connecting with community agencies for on-going support.)

However, the report does not mention services that Woodgreen offered that EPIC does NOT deliver and it doesn’t mention critical differences in how those services were/are accessed:

1. Woodgreen’s services were **tenant-centred** and accessible to any tenant in Toronto with a housing emergency.  
As noted above, TEM’s ESS protocol only makes supports available to Toronto residents without personal resources, including insurance, and only low-income tenants who meet those criteria may be eligible for support from EPIC.
2. Woodgreen would respond to a much wider range of issues. They would respond to imminent closures/displacement (where emergency displacement prevention support was offered), and not just “sudden closures” which are what trigger an ESS response. Critically, they would also provide emergency support to tenants displaced for reasons other than fire or City-initiated closure/evacuation notice, including landlord-initiated displacement like an illegal lock-out. Woodgreen would intervene to stop illegal informal eviction efforts, and connect tenants with City staff when needed to address an emergency, ensuring that pre-determined 311 categories didn’t prevent tenants from accessing necessary help in an emergency.
3. In addition to acting on referrals from the City and Red Cross, Woodgreen’s service provision [was public-facing](#): they offered their services through their Housing Help Centre and also took referrals from community agencies and members of the public, including from tenants themselves.  
This “open referral” approach meant there was a much better chance that a tenant in a crisis would be able to access the appropriate type and level of support, a much better chance that tenant displacement would be prevented, and it created a much better opportunity to track tenant outcomes.

The important services/supports that Woodgreen previously provided MTH tenants must be provided again by someone, somehow, and must be (at minimum), similarly accessible. Especially since implementation of the MTH Framework is likely to increase the need for such services and supports. They also need to be delivered at the dwelling room level, not at the “whole house” level, so that a dwelling room closure triggers a response even if the whole MTH isn’t cleared of tenants.

The FMTA’s MTH outreach service, funded via the Toronto Tenant Support Program, provides information and education to MTH tenants across the city in MTH that have received an Order to Comply; it is a new service that had not been previously offered. Current funding for this service is inadequate: only a single outreach position is funded, and that worker has only been able to reach half of the MTH that received Orders to Comply. The City will be ramping up enforcement to unlicensed MTH in 2026, and so it is highly likely that there will be an increase in Orders issued, yet there is no planned increase in outreach workers. The MTH Legalization Framework implementation update (PH26.3) noted that staff are planning a rollout of “risk-based” outreach, and still there is no recommendation to increase funding/outreach staff. When current staffing levels are inadequate, demand is expected to increase, and an expansion of services is planned, it only makes sense that an increase in funding is

required. At minimum, a team of outreach workers is needed just to ensure that they are able to visit all MTH receiving Orders to Comply, and TTSP funding must be increased accordingly.

While the FMTA's MTH outreach service is important, it does not address the need to a) make emergency support to prevent displacement available to tenants, b) ensure that MTH tenants can access emergency supports when facing displacement and homelessness for reasons other than fire or evacuation order, or c) ensure that higher needs tenants are able to access appropriate supports to help with eviction prevention or rehousing.

**The following measures are recommended to fill these gaps:**

- **Eliminate the restrictions on Emergency Social Service response eligibility to ensure equitable access to emergency services and ensure all protocols are updated appropriately.**
- **Improve the City's response to all issues that can render homes uninhabitable, learning from improvements to the City's response to vital service disruptions.**
- **Create and properly resource public-facing/publicly-accessible emergency support services for MTH tenants, including emergency eviction prevention intervention support and intensive case management rehousing support for higher needs MTH tenants, either by expanding the Toronto Tenant Support Program or by expanding EPIC.**
- **Increase funding to the Toronto Tenant Support Program to fund a team of MTH outreach workers to ensure adequate service levels.**

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*The Multi-Tenant Housing Advocacy Group is an informal group of MTH and affordable housing providers, tenant and affordable housing advocates, tenant support and homeless serving agencies, housing policy experts, and tenants who work together to ensure the existing supply of affordable and deeply affordable rental housing is preserved, and that MTH tenants have secure, affordable, safe, and properly maintained homes and aren't displaced into homelessness.*