



FEDERATION OF  
METRO TENANTS'  
ASSOCIATIONS

## **Re: 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**

The Federation of Metro Tenants' Associations is encouraged by the continued development of city programs and policies that support tenants when they are at their most vulnerable. Residents of multi-tenant housing (MTH) in particular are an underrepresented strata of the tenant population. Many of these tenants are seniors, newcomers, migrant workers, people living with disabilities, and people battling addiction and mental health issues.

In light of the [Implementation of Ombudsman's Recommendations](#) report presented, the FMTA would like to highlight the following recommendations:

1. Continue to improve city legislation and MLS standard operating procedures through a lens of housing as a human right.
2. Build a thorough system and agency backchannels to track and implement solutions to tenant outcomes.
3. Increase funding to TTSP and other community service providers to expand and deepen the array of supports for all displaced tenants.

### **Ensure Right to Adequate Housing**

In the report from May 2025, the ombudsman calls for MLS to continuously improve its standard operating procedures through a lens of housing as a human right. This is to not only to enhance the city's delivery of emergency services but also to keep MLS accountable for the outcomes of the services they provide. The FMTA commends MLS on the efforts that have been made to fulfil this call and encourages the Executive Committee to build on this progress with further changes that will cement the human right to housing in Toronto's legislation.

Housing as a human right is more than a set of principles, it is an array of recommendations that governments are expected to follow in support of tenants. In this vein, the Canadian Human Rights Commission (CHRC) guides all levels of government to pursue the progressive realization of concrete improvements to housing policies and programs that will protect vulnerable tenants. The CHRC is clear to state that governments do not have to provide housing themselves but must use all available resources and all appropriate means to mitigate the harshest effects of the housing market so that shelter is fully accessible to everyone regardless of income or status. This housing must be secure and affordable but also in a viable location for the tenant and appropriate to their culture.

While the improvements MLS has undertaken thus far are a good start, the Executive Committee can direct MLS and other city services to adopt more comprehensive changes in order to further these goals. Tracking tenant outcomes as described below is one such improvement along with greater eviction protection across the board.

## **Tracking Tenant Outcomes & Backchannels to Tenant Solutions**

The ombudsman emphasizes the critical importance of MLS's commitment to monitor service demand and tenant outcomes. Amid a severe housing crisis, displaced tenants often face permanent losses, forced to relocate far from their communities, jobs, and essential services. Tracking where these tenants ultimately end up is essential for developing effective future protections and improved services.

As the report states, the most effective tenant support is to prevent displacement above all and vital service interruptions are only one way that tenants can lose access to their homes. To be fully effective, tenant outcomes must be tracked in all displacements that come as a result of closures and no-fault evictions. This includes but is not limited to rooming house closures of all kinds as well as N13 reno and demovictions, N12 landlord own-use evictions, and unofficial evictions that come from landlord harassment. This way, tenants who are most vulnerable are not subject to repeated violations of their rights as they attempt to find safe, secure housing.

MLS, often a tenant's first point of contact, must collaborate across city divisions and with community partners to fill information gaps and ensure comprehensive data is used to improve service delivery and protections. While supportive of the City's use of mechanisms like the Situation Table for Housing at Risk (STAR) to address service gaps, we also urge the establishment of more direct channels between MLS and agencies to better respond to tenant needs. Resources such as warm referrals between agencies would help address tenant matters that do not meet the criteria necessary to be addressed at the STAR table so no tenant is left behind.

Through upstream collaborative work across divisions and community partners, gaps in tracking can be filled and the totality of the information needed to improve service delivery can be relayed.

## **Expanding TTSP and Community EPIC Services**

Responding to at-risk tenants can be a complex process. Many tenants facing displacement are in deep crisis with layered needs that no one organization may be fully capable of addressing. While STAR and other situation tables address tenant matters of Acutely Elevated Risk (AER), they do not address serious matters that do not meet this criteria. Serious cases that do not fit into the purview of TTSP program operators<sup>1</sup> may leave gaps in service that must be addressed through more resource allocation to the housing sector as a whole. This includes enhancing the EPIC program to provide more immediate relief when city bylaw enforcement falls short, more extensive services to the non-profit housing providers, and more resources to the TTSP program itself.

To provide on the ground support such as case management without the discriminatory restrictions of means testing, the city must build and engage a robust team of service providers capable of addressing the multifaceted challenges displaced tenants face. Expanding TTSP with another funding call through the 2026 city budget would increase the number of funded organizations and therefore the level and variety of services provided. Through these enhancements the city can ensure thorough, culturally

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<sup>1</sup>TTSP program operators include the Federation of Metro Tenants Associations (FMTA), the Canadian Centre for Housing Rights (CCHR), or Centre for Immigrant and Community Services (CICS)

appropriate tenant services and eviction protection. Through collaboration between city divisions and community providers, no tenant needs to be left out in the cold.

## **Conclusion**

Municipal Licensing and Standards are a major connection between the city of Toronto and its residents. Tenants at risk of displacement often reach out to MLS first and as such it can serve as the starting point to track their progress towards secure, safe housing. Bolstered by other city divisions and community partners with expanded funding, this tracking can in turn build the data necessary for more in depth eviction protections. All together, this ensures the city of Toronto continues to honor its dedication to housing as a human right.

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