HS6.3 - Update from the Deputy Ombudsman (Housing)

Submission to the Housing Rights Advisory Committee, June 2, 2025
By Melissa Goldstein, City of Toronto Tenant Advisory Committee member

Summary

Since the approval of the MTH Licensing Framework in December 2022, the Housing Secretariat has demonstrated a pattern of not delivering on its commitments, failing to follow Council direction and reporting requirements related to emergency programs and supports for multi-tenant house (MTH) tenants who are displaced from their homes.

These emergency programs and supports were meant to mitigate the negative effects the City's significant ramping up of MTH licensing enforcement would have on some tenants and represented an effort to realize the City's commitment under the Toronto Housing Charter to ensure that City policies and programs are designed to avoid residents from being made homeless. In the absence of these programs and supports, the MTH Legalization Framework undermines tenants' right to housing rather than helping further realize the right to housing as MTH tenants, already vulnerable and marginalized, have little to protect them from homelessness in situations where increased enforcement results in tenant displacement.

The responses from the Housing Secretariat to the Ombudsman's investigators and the Ombudsman's findings in relation to the MTH experiencing a vital services shutoff are very concerning because they look so familiar: more obfuscation regarding the status of the HART Table and plans to establish it; a promise to report to Council months in the future on Council directions made months and years earlier; claims made that tenant supports exist without any concrete evidence to support the claims; and claims made that work has been planned and budgeted for, without any concrete evidence that this is the case.

The Housing Secretariat must be held accountable for failing to uphold the Toronto Housing Charter and do the work it committed to do and which Council directed it to do to protect the City's most vulnerable tenants from housing emergencies that result from City policy.

Dear Housing Rights Advisory Committee members,

I want to thank the Ombudsman for their recent report and for the York South Weston Tenants Union for helping to bring the MTH tenants' concerns to the Ombudsman's attention.

It is immensely upsetting that 11 low-income, Black tenants lived in horrifying conditions in a Toronto multi-tenant house (MTH) for as long as 6 months and ultimately lost their affordable homes and 10 affordable homes were eliminated from the rental market as a direct result of City staff not doing their jobs or not doing them competently. The utter incompetence of MLS and its MTH team, not to mention their clear bias against tenants, and low-income Black tenants in particular, is shocking.

What I want to focus on today, however, is the Housing Secretariat's responses to the situation and to the Ombudsman and investigators because those responses point to persistent and systemic problems within the Housing Secretariat that have serious implications for multi-tenant house tenants' right to housing.

This submission provides context to and builds upon the Ombudsman's important report, illuminating the failure of the City to provide the promised safeguards to protect the city's most vulnerable and marginalized tenants from harms caused by its own policies.

I have been working with a number of tenant advocates and housing and service providers on the MTH Legalization Framework and its implementation for more than five years now. In that time we have been persistently raising concerns with City staff and Councillors about the lack of supports for tenants facing sudden or imminent displacement as a result of unit closures by Toronto Fire Services and as a result of increased enforcement of MTH licensing and challenging licensing requirements.

MTH tenants already experience emergency displacement as a result of fire and as a result of forced evacuations by Toronto Fire, too often resulting in the tenants becoming homeless. We have been concerned that enforcement

of the new licensing requirements will put even more tenants at risk of homelessness by a) increasing forced evacuations of tenants in Fire Code non-compliant MTH by Toronto Fire Services, b) encouraging landlords to evict tenants as a way to comply with or become exempt from licensing requirements, and c) encouraging landlords who can't comply with the licensing requirements to cease operations and/or sell their properties and evict the tenants.

We were hopeful when the MTH Licensing Framework was passed in December 2022 because it included a commitment and Council direction to develop program infrastructure to mitigate tenant displacement and prevent MTH tenants from becoming homeless. That hope, however, quickly turned to disappointment and then frustration when, over the next two years, staff not only failed to deliver on any of it (and Council failed to hold them accountable), but staff misled and gaslit advocates who attempted to hold them accountable.

To illustrate the situation we've been dealing with, see Appendix A, a table of staff commitments and Council directions related to emergency MTH tenant supports and the status of those commitments and Council directions.

Undelivered commitments referenced in the Ombudsman's report

Housing At Risk Table (HART)

As you can see from Appendix A, staff committed to setting up an interdivisional Housing At Risk Working Group in 2022 as a key component of a plan to protect and support vulnerable tenants and monitor the impacts of policy changes for the purpose of informing revisions to ensure tenants are supported and protected. The plan was to have the Working Group set up in advance of the MTH Licensing bylaw and the renoviction policy coming into effect so that it could support tenants in a variety of housing situations facing imminent displacement. Staff reiterated its commitment to create this Housing At Risk body again and again over 2022, 2023, 2024 and in 2025. It's been over a year since the MTH Licensing bylaw came into effect, and The Working Group (or HART Table, as it is now referred to) has still not been set up.

Given this context, I found the Ombudsman's "findings" about the Housing At Risk Table very concerning. The report notes that "Part of the Housing Secretariat's strategy is to create an interdivisional case management table to support residents whose housing is at risk, **which they have already done** [my emphasis]. Under this model, representatives from various City divisions meet regularly, and present complex cases. They seek advice and resources from other divisions and develop plans to support these residents."

However, later in the same report the Ombudsman says, "I am encouraged that the Housing Secretariat **is in the process of developing** [my emphasis] an interdivisional case management table to support residents whose housing is at Risk."

In the City Manager's response at the end of the report, which provides an overview of changes and investments in the implementation of the MTH framework and bylaw, there is no mention at all of the HART Table or any interdivisional body to support tenants faced with emergency relocation. At the recent Council meeting where the Ombudsman's report was discussed, the Housing Secretariat's Doug Rollins made no reference to the HART Table and instead said that "another important tool the city has is the SPIDER Table, a specialized interdisciplinary group that works on elevated multidivisional challenges," and that going forward "issues like this" will be targeted for that group.

There is nothing encouraging about this situation. Sadly, there were no recommendations by the Ombudsman or Council direction related to the HART Table. Instead, City Council directed the Deputy City Manager, Development and Growth and the Deputy City Manager, Community and Emergency Services to provide support for multi-tenant house tenants in the event of unexpected closures and/or circumstances that may render their home uninhabitable through expanded eligibility and additional investments for the Eviction Prevention in Community program and services of Toronto Emergency Management, and by leveraging the City's Specialized Program for Inter-divisional Enhanced Responsiveness (SPIDER) program, and without providing any timelines, budget, or reporting requirements.

Indeed, the update being presented later today via HS6.9 makes no mention of the HART Table either.

Note that the SPIDER program does not and cannot function as a substitute for the functions of the HART Table. Based on the many staff reports where the role of the HART Table is mentioned, the HART Table is meant to:

- coordinate interdivisional planning and responses to mitigate the loss of affordable and mid-range rental housing and support tenants who face evictions;
- make recommendations to the City Manager concerning policy or program changes to address systemic and structural gaps that contribute to the loss of affordable and mid-range rental housing, and housing precarity for tenants;
- review "data gaps" in City processes with respect to obtaining information and propose operational changes to improve data collection;
- coordinate emergency relocations and supports for tenants who have been evicted;
- review complaints received from residents for purposes of triaging complaints within the City administration for action (including further investigation);
- mitigate the loss of units or transition tenants to alternative housing solutions, if relocation is the only option;
- proactively plan to attempt to mitigate potential displacement caused by the MTH legalization framework;
- monitor the implementation of the MTH Legalization framework on potential tenant displacement;
- monitor the impacts of the MTH Legalization framework throughout implementation, including tracking data and developing metrics on impacts on tenants, housing affordability, and evictions;
- connect people to supports and information, including external resources

The SPIDER program is not designed for and does not have the capacity to do this work.

Emergency support for MTH tenants facing sudden or imminent displacement

I found it very interesting (and validating) that the Ombudsman found that the Housing Secretariat had not developed recommendations for supporting multi-tenant house tenants in the event of emergency relocations and/or unit closures as previously directed by City Council.

For two years now, I have been asking staff, Councillors, and the Planning and Housing Committee to account for staff's failure to report back on this Council direction and the lack of supports and protocols in place to support MTH tenants facing sudden or imminent displacement as a result of room/MTH closures or landlord pressure. Housing Secretariat staff told me explicitly that they considered this "report back requirement" to have been met. The City's "report request log" indicates that the requirements were met via 2023 EX3.1, PH4.7, PH5.5–none of which actually address this request.

Confused by this response by staff, I have asked staff on multiple occasions to explain what supports were available to tenants in the event of emergency relocations and/or unit closures. At a meeting of the Tenant Advisory Committee on July 13, 2023, staff told TAC members that "a newly implemented emergency relocation program through the existing Eviction Prevention in the Community (EPIC) program and additional work is underway with an interdivisional staff team to ensure processes are in place to support MTH tenants."

When I asked for details about this program, staff arranged a lengthy presentation to the Tenant Advisory Committee on January 17, 2024 on "multi-tenant housing eviction prevention, emergency relocations, and renovation," with staff from the Housing Secretariat, the Eviction Prevention in the Community (EPIC) program, and Toronto Emergency Management (TEM) joining to present, answer questions, and receive feedback from TAC members. Despite my persistent asking about supports available for tenants in need of emergency relocation support, Toronto Emergency Management did not mention that they took referrals to EPIC for support, and the EPIC presentation was clear that the only support provided was eviction prevention support to tenants who had received a formal eviction notice.

The Ombudsman's report noted that "EPIC's own policy documents do not address the services it delivers in support of TEM, eligibility criteria, EPIC's role when it receives a referral, or resource allocation between TEM and the Housing Secretariat. There is no memorandum of understanding, interdivisional protocol, or other document which sets out considerations such as the referral process between TEM and EPIC. Housing Secretariat staff could not provide us any written evidence documenting that EPIC had taken on the role previously done by a third-party community agency to support tenants at risk of displacement."

I have to wonder if the Ombudsman collected any evidence that displaced MTH tenants have been referred to TEM, that TEM has referred displaced MTH tenants to EPIC, and/or that EPIC has provided displaced MTH tenants with supports and prevented them from homelessness. Is the Ombudsman certain that this program exists? Because after reading their report, I am not.

It was very concerning to learn from the Ombudsman's investigation that MLS bylaw enforcement officers are provided no guidance to try to find housing supports for tenants facing temporary or permanent displacement or to even make referrals to service providers. Staff told investigators "that they do not have the expertise or resources, and it is not their role to act as housing caseworkers." A properly developed and implemented plan to support multi-tenant house tenants in the event of emergency relocations and/or unit closures would involve providing training and guidance/standard protocols to MLS bylaw enforcement to enable them to provide tenants facing temporary or permanent displacement with basic support, information and referrals.

Given that staff have insisted that the "report back" requirement has been met, I found "management's" response to the Ombudsman, that they intend to present recommendations in 2025, surprising. Did they imply that they had been planning on presenting these recommendations in 2025 all along? Or was this an acknowledgement that they did not report back as directed and now planned to do so? To me their response sounds like more of the same, now amounting to two and half years of avoiding developing plans or recommendations for supporting multi-tenant home tenants in the event of emergency relocations and/or unit closures.

I was pleased to see City Council direct the Deputy City Manager, Infrastructure Services, the Deputy City Manager, Development and Growth, and the Deputy City Manager, Community and Emergency Services to report to Planning and Housing Committee by December 31, 2025, on recommendations to support multi-tenant house tenants in the event of unexpected closures and/or circumstances that may render their homes uninhabitable, including availability of emergency temporary accommodations for displaced tenants, bylaw changes, creation of new programs, and associated funding requirements."

I found it disheartening, however, that only temporary accommodations are mentioned, as temporary accommodations will be inadequate to prevent tenants who permanently lose their housing as a result of licensing enforcement from becoming homeless.

The Ombudsman recommended that the City consider whether to update or replace the Rooming House Emergency Response Plan. As they said in the report, "I believe the RHERP would be a useful blueprint for developing an updated, coordinated plan to support multi-tenant home tenants at risk of displacement, while prioritizing tenants' human right to adequate housing and the preservation of affordable housing in the City." I agree with this assessment. The RHERP is markedly different from EPIC's program model, which is well designed for its intended purpose of helping tenants in receipt of social assistance avoid imminent eviction. An emergency program and protocols for tenants facing sudden or imminent displacement should be designed and funded solely for that purpose and be operated independently of EPIC and it should be integrated with the implementation of the MTH Legalization Framework.

Review of Tenant Programs

Housing Secretariat management told the Ombudsman that the division plans to begin the process of reviewing and revising its tenant support programs in 2025, including the policies guiding EPIC's services and that "they have secured funding from City Council for a staff position to carry out this work in their most recent budget."

However, the only new staff positions funded via the 2025 budget were "three additional positions for Housing Development, Renewal, and Improvement, to support the delivery of expanded housing targets and development initiatives." (see p.15, 19, and 30). No plans to review or revise its tenant support programs were ever mentioned previously, and such plans were not mentioned in the 2025 Budget. The Housing Secretariat's Renters Unit seemed unaware that this review is (or will be) happening at a May 29th meeting. This appears to be a brand new, previously unannounced plan and commitment made specifically to appease the Ombudsman, and without an associated recommendation from the Ombudsman or direction from Council, I have to wonder if it will actually happen.

Conclusion

Although presented to Torontonians as an initiative to improve tenants' housing conditions and tenant safety, the City of Toronto's new MTH licensing regime puts low-income, vulnerable tenants at increased risk of displacement and homelessness. MTH tenants experiencing sudden or imminent closures or displacement by landlords or Toronto Fire will need emergency support if they are to stay safe and remain housed. Instead of adhering to plans and Council direction to put safeguards in place before implementing this new framework, thereby making an effort to protect tenants' right to housing and meet the City's Toronto Housing Charter commitments, staff have made bylaw enforcement the priority and have simply swept concerns about the safety and housing security of MTH tenants under the rug, ignoring the very real, and incredibly serious consequences this will have for the health and wellbeing of some of the city's most vulnerable and marginalized tenants.

Today's update being presented via HS6.9 on supports for MTH tenants demonstrates the City's continued failure to deliver on its commitments and directives by Council to ensure that vulnerable MTH tenants don't fall victim to the policies that were meant to protect them and their housing rights.

In addition to holding staff accountable to the commitments they have made and Council direction they are required to follow (see Appendix A), I hope that the Housing Rights Advisory Committee, in its advisory capacity, can help to further MTH tenants' right to housing by recommending that Council:

- Provide funding to support the establishment and operation of the long-anticipated interdivisional HART Table; direct staff to establish the HART Table ASAP; and integrate the HART Table into a revised and restarted Rooming House Emergency Response Plan.
- Direct Housing Secretariat staff to review existing tenant support programs, including the Toronto Tenant Support Program, and outcomes and report to Council on program metrics and tenant outcomes.
- Direct staff to develop, in consultation with tenants and tenant serving organizations, a comprehensive and adequately funded interdivisional Displacement Strategy to ensure that Torontonians facing unexpected loss or closure of their homes as a result of fire, inhabitability, closure, redevelopment, renoviction, enforcement of MTH licensing requirements, etc., remain housed in the long term, as part of an updated and restarted Rooming House Emergency Response Plan. The program should ensure that every tenant who needs it can access it and should be funded accordingly.
- To improve oversight and accountability, encourage the seamless referral and support process, and facilitate the tracking of tenant outcomes:
    - Direct Toronto Fire Services to report back regularly on the number of MTH tenants forcibly evacuated, the reason for evacuation, and the number of tenants referred to TEM for support.
    - Direct Toronto Emergency Management to report back regularly on the number of displaced MTH tenants referred to them for support, the number of MTH tenants that it refers for support, and where the tenants are referred to.
    - Direct the Housing Secretariat to report back regularly on the number of displaced MTH tenants provided with support, including details of support provided and cost of providing such supports.
- Require MLS, 311, Housing Secretariat, Toronto Building, and Toronto Fire Services in their November 2025 report back on implementation of the MTH Legalization Framework, to each demonstrate how their standard operating procedures related to MTH licensing and enforcement take the human right to adequate housing into account and prioritizes security of tenure, preservation of affordable housing units, and minimization of the impacts on tenants.
- Require in the Deputy City Managers' report back on recommendations to support multi-tenant house tenants in the event of unexpected closures and/or circumstances that may render their homes uninhabitable, building the capacity of MLS staff via training and the development of guidance and standard operating procedures to provide tenants facing temporary or permanent displacement with basic support, information and referrals.

Appendix A

Date and location	Commitment or Council direction	Status	Context
July 2022 **PH35.18** Staff report p.15	"This report recommends City Council approval of a Housing At-Risk Table (HART) to support implementation of the proposed Renoviction Policy and future by-law (Attachment 2)"	No Housing At Risk Table established.	
July 2022 **PH35.18**	City Council authorize the Executive Director, Housing Secretariat to establish a Housing At-Risk Table as set out in Attachment 2 to the report (June 20, 2022) from the Executive Director, Housing Secretariat, subject to the proposed Housing At-Risk Table being subject to a review and assessment by the City Clerk to confirm compliance with respect to the City's obligations under the Municipal Freedom of Information and Protection of Privacy Act and other Information management obligations, and include in their efforts developing a program to track the sale of rental buildings and when the City has information that a rental building is sold, or other information steps will be taken to obtain vacant possession of a rental building or unit for the purpose of renovations or repairs, there is an immediate outreach campaign by the City to the tenants involved informing them of their rights and of the Renoviction By-law.	No Housing At Risk Table established.	
Dec. 2022 Commitments made in approved staff report.	A report back that will include considerations to:	No report back.	Housing Secretariat staff told me they considered this "report back requirement" to have been met. The City's "report request log" even indicates that the requirements were met via 2023 EX3.1, PH4.7, PH5.5 –none of which actually address this request.
p.63	Clearly identify roles and responsibilities between City divisions to improve the effectiveness and timeliness of the City's response;	Not done. Ombud's report demonstrates confusion among Housing Secretariat staff about roles and responsibilities.	

p.63	Improve tenant communications during and following the emergency event;	No communications protocol for emergency events.	
p.63	Develop protocols to ensure that relevant support is immediately available, ideally on-site, to support tenants in their emergency housing needs when evacuation orders are issued	No protocols exist.	
p.64	Develop resources and information to immediately assist tenants and Operators when there is a need for an emergency evacuation, including the protection of tenant rights.	No resources or information developed to help tenants or Operators with emergency evacuations.	
p.64	Consult the City's Tenant Advisory Committee (TAC) as this new protocol is developed	No consultation with TAC on protocol.	
p.64	Housing-At-Risk Working Group will provide input on interdivisional protocols and how they are applied.	Housing At Risk Working Group has not been established.	
p.64	Establish a Housing-at-Risk Working Group comprised of staff from across divisions to identify potential policies, programs and resources that could be applied to mitigate the loss of units or transition tenants to alternative housing solutions, if relocation is the only option	Housing At Risk Working Group has not been established.	
p.64	Consult community partners and the Tenant Advisory Committee to inform the proactive plan to mitigate displacement;	Community partners and TAC have not been consulted on proactive plan	
p.65	In year one: The Housing Secretariat will establish a Housing-At-Risk Working Group to proactively plan to attempt to mitigate potential displacement caused by this framework.	Housing At Risk Working Group has not been established.	
p.67	In year two: Ongoing Monitoring of Potential Displacement The Housing Secretariat, through the Housing-At-Risk Working Group, will monitor the implementation of the framework on potential tenant displacement. As necessary, policy and supports may shift to minimize adverse tenant impacts and the loss of affordable housing.	Housing At Risk Working Group has not been established. Potential tenant displacement is not being monitored.	
p.67	In year three: In addition, staff will monitor the impacts of the new framework throughout implementation, including tracking data and developing metrics on: • Impacts on tenants, housing affordability, and evictions;	Unclear if metrics on tenant impacts, housing affordability and evictions have been developed	
Dec. 2022 Council	60. City Council direct the Executive Director, Housing Secretariat, in consultation with Chief Building Official and	No report back.	

direction 2023.CC 2.1	Executive Director, Toronto Building, the Chief Planner and Executive Director, City Planning, the Fire Chief and General Manager, Fire Services, and the General Manager, Shelter Support and Housing Administration, to report back by March 2023 with a set of recommendations aimed at supporting tenants in the event of required emergency relocations and/or unit closures.	No recommendations to support tenants in the event of required emergency relocations or closures.	
	61. City Council direct the Executive Director, Housing Secretariat, in conjunction with the Chief Planner and Executive Director, City Planning, the Executive Director, Toronto Building, and the Fire Chief and General Manager, Toronto Fire Services, to report annually throughout the implementation period to Planning and Housing Committee on multi-tenant houses, including but not limited to: a. applications for new multi-tenant houses; b. unlicensed multi-tenant houses that were successfully brought into licensing compliance with City by-laws; c. licensed multi-tenant houses that are not meeting the property standards and what is the interdisciplinary enforcement approach needed to bring them into compliance; d. data and statistics by ward regarding complaints for both licensed and unlicensed multi-tenant houses plus complaint outcomes and resolution rates; e. adequate funding resources needed to meet the intended and timely implementation of the new regulatory licensing and enforcement framework, as expected by City Council and the residents of Toronto; and f. results of a land economics study related to multi-tenant housing permissions and other missing middle housing permissions as introduced, including their economic viability and impacts on residential property values, and the economic viability of other residential units and housing types in comparison to multi-tenant houses and missing middle housing, and report back to Council with the results during the implementation period.	No report back. The staff report makes clear that the implementation period begins a year before the bylaw comes into effect. Year one of the implementation period was March 30 2023-March 30 2024. Year two of the implementation period is March 31 2024 (the day the bylaw comes into effect) to March 30 2025.	It is June 2025 and there has not been a report back. Staff say there will be a report back in November 2022: which is 8 months into year 3 of implementation. Advocates have asked for monitoring and tracking of tenant impacts and we have been assured they would be coming, but we have seen nothing.
	64. City Council direct the Executive Director, Housing Secretariat, in consultation with the Executive Director, Municipal Licensing and Standards, the Chief Building Official and Executive Director, Toronto Building and other relevant Divisions, to include as part of report back to the Planning and Housing Committee by the third quarter of 2023 on Item PH35.18 - Renoviction Policy - Creating a Framework to Protect Affordable and Mid-range Rental Homes and Deter Renovictions, opportunities to negate displacement of tenants of Multi-Tenant Homes undergoing renovations related to compliance.	Staff didn't report back until October 2024.	The 2023 HousingTO 2020-2030 notes "Staff are currently exploring options for regulatory and operational implementation of the Renovictions Policy and will report back to Council in Q4 2023 – Q1 2024" (p.9)
July 13 2023 Tenant Advisory Committee meeting	City told TAC members that the City has a number of eviction prevention and tenant support programs, including a newly implemented emergency relocation program through the existing Eviction Prevention in the Community (EPIC) program and additional work is	Additional details never came.	At this meeting I asked about what has occurred that satisfied the Council direction

	underway with an interdivisional staff team to ensure processes are in place to support MTH tenants, as needed, once new zoning and licensing bylaws will come into effect on March 31, 2024, and that staff will provide additional details on this over the upcoming weeks."		from Dec. 2022 for staff to create plans to address emergency relocation and supports for tenants & report back to Council for March 2023. This was their response.
Jan 2024 Housing Secretariat Budget Note	"Launch a Housing At-Risk Table (HART)" is listed as one of the 3 activities listed under the "Priority" of "Advance a Renter Strategy and increase supports for renters.	HART table not launched	
March 2024 PH10.2	City Council request the Deputy City Manager, Infrastructure Services, and the Deputy City Manager, Development and Growth Services, to report back to Planning and Housing Committee in the fourth quarter of 2024 and to inform the 2025 budget process with a report on supports for Multi-Tenant House property owners and the New Multi-Tenant Houses Renovation Program to Preserve and Improve Affordable Rental Homes, including: a. the creation of a streamlined property owner support service or tool to provide a central point of access and guidance for property owners looking to bring their multi-tenant houses into compliance under the new Framework, in collaboration with cross-divisional staff from Housing Secretariat, Municipal Licensing and Standards, Toronto Building, Toronto Fire Services, City Planning, and other relevant divisions; and b. programs, resources and supports specifically for tenants in multi-tenant houses, including: 1. a direct point support line for tenants facing displacement to access resources and supports, including exploration of tenant hub opportunities; 2. a summary guide of resources and programs available to tenants in multi-tenant housing facing displacement, with clear access information; and 3. consultation and engagement with the City of Toronto's Tenant Advisory Committee and Housing Rights Advisory Committee.	No report back. June 3 2025 via HS6.9: staff indicate that a report back will included in MTH update report in fall 2025. No support service or tool. -311, legal support line, and 1 outreach worker deployed. -guide is not adequately displacement focused -TAC not consulted or engaged on this	In response to this failure to report back in time to inform the 2025 budget process, advocates asked for a briefing note on the City's plan to ensure Multi-tenant Housing tenants displaced as a result of Multi-tenant Housing licensing enforcement are able to avoid homelessness by accessing alternative accommodations, including clarification of the resources in the 2025 budget dedicated to this purpose.

June 2024 PH13.7 Staff report p.12	To support implementation of the Renovictions Policy and by-law and the implementation of the multi-tenant housing framework, staff are establishing a Housing At-Risk Table (HART) which will include an interdivisional team to coordinate responses and actions to prevent the loss of affordable rental homes. Interdivisional consultations, feedback from members of the public, and ongoing input and advice from the Tenant Advisory Committee have highlighted that there are many complex housing issues facing tenants that require triaging and targeted interdivisional City responses. Discussions with City divisions have taken place to better understand gaps in City programs and services, potential resource requirements, and expectations. As part of the HART development process, staff are currently reviewing similar incident response tables, including SPIDER (Specialized Program for Inter-divisional Enhanced Response to Vulnerability) and FOCUS (Furthering Our Community by Uniting Services). These are tables that bring together City divisions and community partners to address specific cases of people facing complex vulnerabilities.	HART table not established	
Oct 2024 PH.16.4 Staff report p.20	Development of Housing at Risk Table and intersection with renovictions bylaw implementation	Housing At Risk Table has not been developed.	
Nov 2024 PH.16.4	City Council direct the Executive Director, Housing Secretariat, and other relevant City divisions to direct the resources identified in the Supplementary Report (November 12, 2024) from the Executive Director, Housing Secretariat and Chief Building Official and Executive Director, Toronto Building for implementing enhancements to the Toronto Tenant Support Program, beginning in November 2024, and request any additional resources required through the 2025 budget process.	Resources were not directed to Toronto Tenant Support Program until Feb. 2025 & only after I noticed 2025 Budget notes made no mention of these resources & staff were questioned	
Jan 2025 Secretariat's 2025 Budget note (p.12)	"Launch a Housing At-Risk Table to keep residents in their homes and avoid further pressure on the City's shelter system" is again listed as one of the 5 activities listed under the "Priority" of Advance a Renter Strategy and increase supports for renters."	HART table not launched	
2025 Budget briefing note	Briefing note on the City's plan to ensure Multi-tenant Housing tenants displaced as a result of Multi-tenant Housing licensing enforcement are able to avoid homelessness by accessing alternative accommodations, including clarification of the resources in the 2025 budget dedicated to this purpose. No mention the HART Table or any supports available to tenants facing emergency relocations beside TEM which "provides tenants who are evacuated from their home due	No mention the HART Table	With the failure of staff to report back as per PH10.2, budget advocacy resulted in Budget Committee requesting this briefing note.

	to an unforeseen emergency (such as a fire) and do not have access to other support systems, with access to emergency social services to address immediate, short-term needs, including accommodation” with no details or associated budget information. EPIC is noted as providing eviction prevention support only.		