



TO: Housing Rights Advisory Committee

DATE: September 16, 2025

RE: Mapping Resources for Tenants at Risk and Update on the Situation Table for Housing-at-Risk (HS7.3)

The Toronto Alliance to End Homelessness (TAEH) is a community-based collective impact initiative committed to ending homelessness in Toronto. Our network includes non-profit organisations that support those living with homelessness and those who are housed and who must spend a disproportionate amount of income on housing, as well as affordable and supportive housing developers, property managers, and landlords.

The Systems Barriers to Housing Outcomes Working Group investigates identified barriers in our systems to housing outcomes for people experiencing, or at risk of, homelessness. The group gathers and documents these barriers and creates evidence-based recommendations for system changes.

We welcome this opportunity to speak to you today about our concerns related to the impacts of the Multi-Tenant Housing (MTH) Framework and to bring forward recommendations to mitigate them.

TAEH supported City Council's decision to licence multi-tenant dwellings across the city in 2022 as this type of housing is often the only one available to people with very low income in Toronto. We did so, in part, because there were commitments and Council direction to develop strategies to ensure that the licencing framework would not render current MTH tenants homeless, consistent with its commitment to uphold the principles of Toronto's Housing Charter.

In particular, the Housing At Risk Table (HART) was to play a central role in supporting tenants facing eviction due to MTH licencing enforcement. We are very concerned that the shift away from the HART table strategy to the new Situation Table for Housing-at-Risk (STAR) will not provide the critical focussed, whole-building approach the former promised to mitigate the negative effects on tenants of the MTH licensing framework and its enforcement.

Current data from the Federation of Metro Tenant's Association, which is funded by the City to do outreach to MTH tenants, suggests that many tenants in unlicensed MTHs who have received an order to comply are facing eviction or may have already been evicted. Given the lack of deeply affordable rental housing, many of these tenants are at risk of homelessness, or are already 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. MTH tenants,

already vulnerable and marginalized, have little to protect them from homelessness in situations where increased enforcement results in tenant displacement.

Recommendations

1 – If it is truly too late to return to it, the proposed HART strategies promised must be brought back into those of the STAR Table or delivered elsewhere. To date, it seems that the STAR Table announced recently to take its place will not include the following responsibilities that were to be undertaken by the proposed HART table:

- 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—not just complex cases.
- Mitigate the loss of units or transition tenants to alternative housing solutions, if relocation is the only option—not just complex cases.
- 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.

These HART table responsibilities represent critically important work that must be done to ensure the City meets its commitment to preventing and protecting tenants from displacement and homelessness and preserving the existing supply of affordable rental housing.

2 - One way to do this is to restart an updated Toronto's Emergency Rooming House Response Program as a **Multi-Tenant House Emergency Rooming House Response Program.** This was an emergency homeless prevention approach that worked and can, with the right updated design and adequate funding, do so again.

Recently the Ombudsman recommended that the City consider whether to update or replace the Rooming House Emergency Response Plan. As they said in their 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."

We agree with this assessment. An emergency program and protocols for tenants facing sudden or imminent displacement should be designed and funded solely for that purpose and be integrated with the implementation of the MTH Legalization Framework. We also suggest that it be “owned” by community, not the City, and operated through a non-profit agency or agencies as it was before.

3 - Create a City of Toronto-funded portable housing benefit specifically for displaced MTH tenants at risk of homelessness. This can be distributed through an updated Emergency Rooming House Response Program and other tenant support agencies. Given the effectively non-existent supply of deeply affordable and affordable rental housing available to displaced MTH tenants, it is critically important that tenants are provided with the financial support necessary to access alternate housing and avoid homelessness.

TAEH and our members continue to join the City in advocating for increased federal and provincial resources for housing benefits and income supports. We also recommend here, again, that the City find a way to lead by example and create its own rent supplement for tenants facing homelessness due to MTH closures. This is a high-value approach that not only prevents homelessness to begin with but also provides significant savings in shelter costs.

Conclusion

TAEH strongly recommends that the responsibilities that were to be undertaken by the HART Table related to program coordination, data collection, monitoring, evaluation, revision, and prevention of tenant displacement/homelessness and affordable housing loss be implemented through an updated Emergency Multi-Tenant Response Program.

We also support the recommendations of others before you today, including: (1) proactive displacement prevention workers to do outreach to all unlicensed MTH tenants, and not just tenants of MTH that have received an “order to comply;” and (2) to ensure reporting on policy impact and program effectiveness metrics to allow the tracking of impacts on tenants and the supply of affordable housing and timely interventions. We believe these can be well-integrated into a new emergency response program.

Our working group and all TAEH members are ready to support the City in moving forward with our recommendations and appreciate your consideration of them today. Together, we can deliver better responses to the vulnerable Torontonians facing homelessness due to no fault of their own and ensure that they are not collateral damage to the otherwise positive impacts of Toronto’s Multi-Tenant Housing framework.

Thank you,

Pablo Escobar, Chair
System Barriers to Housing Outcomes Working Group, TAEH