Mapping Resources for Tenants at Risk and Update on the Situation Table for Housing-at-Risk

Submission to Housing Rights Advisory Committee

September 15, 2025

Submission by: Right to Housing Toronto

Elizabeth McIsaac
Chair of the Housing Rights Advisory Committee
Toronto City Hall
100 Queen Street West
Toronto, ON M5H 2N2

Dear Members of the Housing Rights Advisory Committee,

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

We are representatives of the Right to Housing Toronto (R2HTO), a network of organizations and individuals working to support the implementation of the right to housing by the City of Toronto. We are writing in response to item HS7.3 regarding resources for renters at risk of displacement and the launch of the Situation Table for Housing-at-Risk.

Supports for renters in multi-tenant housing

Following R2HTO's recent response to the City's survey on Year One of the Multi-Tenant Houses (MTH) Framework, **we remain concerned that the City's current renter support programs[1] will not address the specific situations of potential MTH renter displacement and affordable housing loss under the new MTH regulatory framework**, including as a result of:

- Zoning restrictions (e.g., the six-room limit for MTHs in many areas of the city).
- MTH operator sales or conversions.
- Ongoing unlicensed MTH operations.

While the City does have some policies[2] in place to support renters displaced by an MTH closure, in the absence of sufficient data on MTHs across the city, the City will not be able to adequately ensure that MTH operators are adhering to City policies and that MTH renters have information about supports available to them. Moreover, in the absence of sufficient stock of affordable housing in both the private market and community housing sector, there are increasingly few options available to displaced MTH renters, who are often very low-income and face other intersecting socioeconomic barriers.

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[1] For example, Toronto Rent Bank, Toronto Tenant Support Program, Eviction Prevention in the Community, Housing Stabilization Fund, Toronto Emergency Management, Situation Table for Housing-at-Risk.
[2] For example, Housing Help Centres, Ending Operations Plan, dwelling room replacement policy.

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Situation Table for Housing-At-Risk

In addition, while it is encouraging to see the launch of the Situation Table for Housing-At-Risk (STAR), **we are concerned about the limits of its focus and reach, both in terms of the number and scope of cases that it can support, as well as its ability to influence policy change**. It appears that the STAR table is the culmination of prolonged community advocacy to launch the delayed Housing At-Risk Table (HART), which was meant to coordinate interdivisional planning and responses related to evictions and affordable housing loss. Currently, it appears that the STAR table will primarily be focused on case management for individuals with complex housing related needs. While this is a critical service, we are concerned that the STAR table appears to no longer have the important mandate to (among other key activities):

- Provide recommendations to address policy and program gaps that contribute to affordable housing loss, housing precarity, and displacement.
- Review and improve data collection efforts related to affordable housing loss, housing precarity, and displacement.
- Monitor the implementation and impacts of the MTH framework and other City rental housing policies and programs as it relates to affordable housing loss, housing precarity, and displacement.

Recommendations

We understand that the City will be reporting back to the Planning and Housing Committee on the first year of the implementation of the MTH framework in Fall 2025. In anticipation of that report, **we encourage the Housing Rights Advisory Committee to call on the City to strengthen supports for renters facing displacement (with a particular focus on MTH renters) and expand the mandate of the STAR table to include policy monitoring and development**. This could include:

- Developing targeted programs and policies to support MTH renters facing displacement (e.g., housing benefits, alternative housing solutions, system navigation).
- Coordinating enforcement and implementation of the MTH framework across City divisions to prioritize renter safety and security and affordable housing preservation.
- Providing training on the right to housing for all staff involved in the implementation of the MTH framework and other rental housing policies and programs.
- Gathering data on renter displacement and affordable housing loss across the city, with a particular focus on MTHs.

- Monitoring the impact of the MTH framework, renovictions bylaw, and other rental housing policies and programs, including through direct engagement with renters.
- Improving access to the MTH Renovation and Repair Program to help operators come into compliance with the MTH framework.
- Prioritizing and maximizing funding for the Multi-Unit Residential Acquisition (MURA) program, including by directing federal and provincial funding toward the program and acquiring MTHs at risk of sale or conversion.

MTHs are a vital element of affordable housing infrastructure and provide homes to some of the most vulnerable members of our communities, including refugees, newcomers, social assistance recipients, students, and other low-income and marginalized groups. As part of its commitment to progressively realize the right to housing (as outlined in the [Toronto Housing Charter](#) and [HousingTO Action Plan](#)), the City must ensure that MTH renters have safe, secure, and affordable homes, while protecting the existing stock of affordable housing.

R2HTO looks forward to reviewing the City's forthcoming MTH implementation update report and we welcome ongoing opportunities to engage with the Housing Rights Advisory Committee around our shared goals to support the City in advancing the right to housing.

Thank you,
On behalf of Right to Housing Toronto (R2HTO)