



INFORMATION REPORT

TO:	Mayor and Members Board of Health
COMMITTEE DATE:	December 6, 2021
SUBJECT/REPORT NO:	Public Health Inspections of Consumption and Treatment Services Sites (BOH21013) (City Wide)
WARD(S) AFFECTED:	City Wide
PREPARED BY:	Jennifer Snow (905) 546-2424 Ext. 3055
SUBMITTED BY:	Michelle Baird Director, Epidemiology, Wellness and Communicable Disease Control Division Public Health Services
SIGNATURE:	

COUNCIL DIRECTION

Not Applicable.

INFORMATION

In June 2021, the Ontario Ministry of Health released the new protocol “Consumption and Treatment Services Compliance and Enforcement Protocol, 2021”. Under this protocol, organizations operating Consumption and Treatment Services sites (CTS) are required, through their Transfer Payment Agreement with the Ontario Ministry of Health, to allow for inspections of the CTS by their board of health.

Beginning in December 2021, Hamilton Public Health Services (PHS) will begin to enforce this protocol with respect to conducting routine, annual on-site inspections of local CTS. In addition, PHS will be responsible for following-up on cause or complaint-based investigations and inspections of CTS.

Routine Inspections

On an annual basis, PHS Infectious Disease Program and Harm Reduction Program staff will contact local CTS operators to arrange an on-site inspection.

OUR Vision: To be the best place to raise a child and age successfully.

OUR Mission: To provide high quality cost conscious public services that contribute to a healthy, safe and prosperous community, in a sustainable manner.

OUR Culture: Collective Ownership, Steadfast Integrity, Courageous Change, Sensational Service, Engaged Empowered Employees.

During the annual inspection, PHS staff will be assessing the following:

- Safe and effective disposal of needles and other harm reduction materials as per the CTS' documented procedures; and,
- Type and volume of harm reduction supplies, including needles found within a 15 metre perimeter of the CTS; and,
- Up-to-date records, including but not limited to the following; and,
 - Log of calls to police services; and,
 - Log of security-related incidents.
- Other potential health hazards related to CTS operations.

Complaint Investigations

The protocol informs that PHS is accountable to assess complaints regarding the disposal of harm reduction materials utilized at, or in the vicinity of, the CTS. This includes assessing if any discarded needles or other harm reductions supplies are present within 15 metre perimeter and if procedures for their safe disposal are being followed. All complaint investigations must be initiated by PHS with 24 hours of receipt of the complaint.

PHS will accept complaints from local stakeholders, including but not limited to the general public, local businesses, Hamilton Police Services, CTS clients and local schools.

Any security complaints received regarding a CTS will be re-directed to the local police.

Authority and Enforcement

Under the provisions of the transfer payment agreement with each CTS, the Ministry of Health, or any authorized representative identified by the Ministry of Health, such as the local Board of Health may enter the CTS premises upon an agreed upon time with 24 hours' notice. The purpose of the entry is to inspect and audit compliance with the Transfer Payment Agreement and program requirements and to conduct an annual routine inspection (see Appendix "A" to Report BOH21013 "Consumption and Treatment Services Compliance and Enforcement Protocol, 2021").

As per the "Consumption and Treatment Services Compliance and Enforcement Protocol, 2021", PHS will use a compliance strategy that balances education, inspection and progressive enforcement. Progressive enforcement strategies include: education, inspections, warnings and graduated options to reflect the frequency and severity of the level of non-compliance. If after implementing progressive enforcement strategies the CTS is still found to be non-compliant, a CTS non-compliance notice will be provided to the Ministry of Health by PHS.

Disclosure

It is required that the Board of Health publicly disclose a summary report on each routine and complaint-based inspection of each CTS. This report will summarize the findings of the inspection along with any steps required to remediate any instances of non-compliance discovered or determined by the inspectors during their inspection.

The disclosure of the reports will be done through posting on the City of Hamilton's website as per other inspections conducted by PHS.

Impact on Hamilton Public Health Services

The addition of this new protocol does not come with additional funding from the province. However, at this time, it is expected there will be minimal impact on staffing resources to carry out the inspection requirements of the protocol and the volume of complaint work will be monitored and assessed to determine resource impacts.

APPENDICES AND SCHEDULES ATTACHED

Appendix "A" to Report BOH21013	Consumption and Treatment Services Compliance and Enforcement Protocol, 2021
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