




INFORMATION REPORT

TO:	Chair and Members General Issues Committee
COMMITTEE DATE:	June 19, 2024
SUBJECT/REPORT NO:	Shelter Inspection Feasibility (HSC24013) (City Wide)
WARD(S) AFFECTED:	City Wide
PREPARED BY:	Robyn Perry (905) 546-2424 Ext. 7801 Shannon Honsberger (905) 546-2424 Rob Mastroianni (905) 546-2424 Ext. 8035
SUBMITTED BY:	Michelle Baird Director, Housing Services Division Healthy and Safe Communities Department
SIGNATURE:	

COUNCIL DIRECTION

On September 21, 2023, the Emergency and Community Services Committee approved Report HSC23007, Hamilton’s Emergency Shelter Standards which included the following:

- (b) “that staff be directed to investigate the feasibility of implementing at least one random inspection of each Hamilton Emergency Shelter on an annual basis and report back to the Emergency and Community Services Committee”.

INFORMATION

The City currently has several ways to connect with shelter providers on a regular basis, such as case worker’s site visits, coordinated access community meetings, operations group meetings, and ongoing strategic planning meetings. Shelter providers are required to follow City policies, such as the shelter standards, as a requirement of their contract. Shelters also engage in accreditation through various accreditation bodies and are reviewed for compliance to industry standards. The City ensures compliance with contractual requirements through these various visits and meetings and does not currently complete random inspections of facilities. Further, there is no current reason to

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believe there is non-compliance with policies. Where there has been deviation or discrepancies in policy or procedure, those items are addressed through the various forums noted above. When required, a new policy process is initiated by the City, informed by shelter operators and what we hear from people with living experience through the shelter consultation process, and implemented (see for example the Shelter Complaints Process or the Service Restriction Policy). The City works on continuous quality improvement through a variety of coordination tables, engagement, and data analysis.

The Emergency Shelter and Residential Care Facilities Systems Complaints Resolution Process was recommended through Council Report HSC23053 and presented on September 21, 2023. Policy for the complaints process is established and complaints are triaged by current housing staff to be addressed by the appropriate staff within impacted Divisions City wide.

Beyond these collaborative efforts and the existing complaints process, whereby issues can be escalated to the City, the City could use financial means to enforce compliance with shelter standards. However, there is a risk in using financial means in this way in a system that is experiencing significant pressure, including loss of shelter beds during a crisis of homelessness in Hamilton. Should shelter beds be lost there would be immediate impacts to the encampments, drop-ins, and other supports in the homeless-serving system.

Given the existing work to implement continuous quality improvement and compliance with City policies, and where there is no reason to believe there is non-compliance, staff do not recommend implementing a shelter inspection process. Instead, staff would prefer focusing on continuous quality improvement to policy compliance, the shelter complaints process, and higher priority projects within the homelessness serving system such as encampment management and reducing homelessness.

In addition, developing and implementing a shelter inspection protocol based on the shelter standards would require additional staffing resources. Information about the resourcing, as well as preliminary program design, outcomes, and consultation are considered below.

Program Design:

Should staff be directed to develop and deliver random, annual inspections of all City-funded shelters, staff would recommend developing a defined list of indicators based on the shelter standards. The standards are community-informed and meant to clarify expectations of shelter provision to protect vulnerable people staying in emergency shelters. This would include categories such as Rights and Responsibilities, Services Provided, Supporting Diverse Communities, and Shelter Operations. Attached in Appendix “A” are potential example questions for a Shelter Inspection Protocol; however, the protocol should be developed in collaboration with shelter providers,

people with living experience, other services providers working with shelters, and best and promising practice to ensure indicators are relevant and minimally invasive.

The guiding questions for the inspection would come from a collaboratively established “question bank” with mandatory and optional questions depending on the operational focus for the year as well as the individual circumstances of the unique shelter. This method would seek to balance transparency and equitable treatment with the changing needs and policy focus of the City.

The inspection process for all 12 emergency shelters would likely take one full day each, excluding planning, report drafting, and correspondence. There could be follow up visits and communications should there be an instance of non-compliance. The inspector would speak to a range of people (management, staff, clients) to better understand the operations, client experience, and compliance to the standards. Given the low risk of non-compliance, staff estimate 75% or more will be compliant.

Following an inspection, the inspector would provide their scoring back to the provider, along with guidance on how to improve operations and better align to the shelter standards. Depending on the results, the inspector may need to conduct follow-up visits to support compliance and continuous improvement. Improvements would be prioritized with appropriate turnaround times.

Staffing:

Should the City move forward with implementing a random inspection protocol, staff would require eight months of lead time to develop the protocol, recruit an inspector, and engage with community partners on design. Staffing requirements include a 0.25 FTE Housing Administration Officer. Salary, benefits, and travel for this position are an estimated \$42,000.

Anticipated Outcomes:

The City has historically had positive and collaborative working relationships with shelter providers to promote compliance with City policies, including shelter standards. Regular visits to observe conditions via Housing Services Division Leadership and Emergency Shelter Case Managers and community engagement activities like the shelter standards review provide the needed opportunity for quality improvement. Staff do not anticipate a marked increase in compliance because of formalized inspections.

Consultation:

In developing the Emergency Shelter Standards Report (HSC23000), staff worked closely with the Emergency Shelter Coordination Table, which includes senior leadership of each emergency shelter. This group is currently working on implementation, including measuring how well staff understand the organizational commitment to the standards, and how to measure compliance. The group raised

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concerns about being singled out for additional work at a time when all resources are being directed towards addressing the housing crisis and overcapacity within shelters.

When developing this report, staff reviewed the inspections currently completed by the City, which includes Fire, Building, and Public Health. These divisions monitor areas relating to environmental health and safety, building inspections, and fire inspections.

Specific feedback was provided by Fire related to inspections. As a Fire department they recognize the importance of preserving building stock used to provide shelter for a vulnerable population and that any reduction in shelter space may contribute to an increase in unsheltered people. The opinion of the Fire Department is that a proactive approach to inspection by the Fire Prevention Division would help to limit the amount of damage and reduce the number of incidents through ensuring the required fire safety systems are in place and functioning and to provide the sheltered occupants with fire safety education. In the event that public health would recognize an emergency situation whereby it would be necessary to increase capacity to shelter individuals the Fire Department would support a task force-based approach to inspection only when increased capacity due to emergency situations are in place. Sufficient resourcing would be necessary to support any involvement by the Fire Department moving forward.

Staff also reached out to municipalities to determine where a similar inspection protocol exists. Two responded, however neither completed inspections related to operating standards.

- In Windsor, inspections were related to COVID compliance measures and conducted by their Housing with Supports workers during their weekly visits for case management.
- In the York region, the Licensing and Compliance Office visits emergency shelters and ensures that providers adhere to the Service Contract and the Core Standards. This would be more similar to a licensing inspection completed by Hamilton's Municipal Law Enforcement staff.

Background:

Housing Services Division does not currently conduct random inspections of any shelter, or any other funded homeless serving programs, to understand the quality of customer service and compliance with program standards. There are several other ways that programs are monitored by The City of Hamilton and other entities, including the following:

Monitor	Area Monitored
Housing Services Division Case Managers and Leadership	Weekly visits to liaise with providers, observe conditions and meet with clients for housing focused case management or other onsite meetings with leadership
Public Health Services, City of Hamilton	Environmental health - one unannounced inspection annually Food Safety - 2 - 3 unannounced inspections annually Unannounced inspections can also be complaint/incident driven
Building Division, City of Hamilton	New build/renovation inspections or for change of use (permits required), no ongoing maintenance inspections post approved occupancy. Where temporary health and residential facilities have been extended, building permits are waived, but inspections are mandatory
Fire Department, City of Hamilton	Fire inspections are complaint/incident driven
Housing Services Division, City of Hamilton	Contract Compliance (finances, funding outcomes), monthly Complaint process for clients ad hoc
Accreditation Bodies (Commission on Accreditation for Rehab Facilities, Canadian Centre for Accreditation)	Compliance to industry standards, frequency varies

APPENDICES AND SCHEDULES ATTACHED

Appendix “A” to Report HSC24013 – Example Questions for a Shelter Inspection Protocol