



TO: Chair and Members of the Board of Health

FROM: Christopher Mackie, Medical Officer of Health / CEO

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VULNERABLE OCCUPANCY INSPECTION WORK AND PUBLIC HEALTH INTERVENTIONS

Recommendation

It is recommended that the Board of Health receive Report No. 016-19 re: “Vulnerable Occupancy Inspection Work and Public Health Interventions” for information.

Key Points

- Public Health Inspectors (PHIs) conduct health inspections in provincially licensed group homes and Homes for Special Care (HSCs) now under the Community Homes for Opportunity (CHO) umbrella, as well as in the municipally licensed group homes under the Informal Residential Care Facility (IRCF) Licensing By-law (CP-21).
- PHIs also have a duty to respond to reports of potential health hazards in housing within the City of London and Middlesex County. Many health hazards have been identified in group homes in London and Middlesex County. Through collaboration with partner agencies and networks, PHIs have aimed to improve the physical environment and provide opportunities for healthier outcomes, especially among vulnerable populations.

Background

In 2015, a Community Response Working Group was created with representation from various agencies and networks across the city to discuss strategies in addressing unsafe and unhealthy living conditions in vulnerable occupancies. Such vulnerable occupancies typically include group residential environments that are rented on an informal basis, often to those struggling with addictions and mental health concerns and who are at imminent risk of homelessness or significant threats to wellbeing. The working group created both a communication strategy and a draft bylaw to help provide regulatory oversight and rapid intervention into unsafe conditions in these residential settings.

MLHU’s responsibilities in these situations derives from the *Health Protection and Promotion Act, R.S.O. 1990, c. H.7*, which states that it is the duty of every Medical Officer of Health “to inspect or cause the inspection of premises used or intended for use as a boarding house or lodging house.” Additionally, the *Health Hazard Response Protocol, 2018* states that the Board of Health shall conduct inspections of boarding/lodging houses on a complaint basis. Where the Board of Health determines there is an elevated health risk specific to a boarding/lodging house, enforcement actions may be undertaken to reduce or eliminate the risk of exposure to health hazards.

Since the Working Group first convened, MLHU has been working with partners, including the Canadian Mental Health Association (CMHA-Middlesex), London Police Services, the Ontario Disability Support Program, SW-LHIN, London CARES, Social/Public Housing, and city services (Fire, Bylaw, Housing, Homeless Prevention), to provide coordinated responses in high risk situations.

On December 22, 2016, the City of London passed the Informal Residential Care Facilities (IRCF) Licensing By-Law CP-21. Prior to this by-law, many operators of unregulated group homes (i.e., homes operating without the requirement of a provincial license) were providing housing and care to individuals without government oversight. Over the years, MLHU had identified health concerns in many of these vulnerable occupancies, and has worked with the operators to help mitigate hazards in an effort to improve the living conditions of our vulnerable occupants.

Current Status

MLHU continues to assist partner agencies and networks in responding to reports of health hazards in vulnerable occupancies and homes specifically licensed under the IRCF bylaw. Currently there are four group homes that are either pending licensing or under inspection as IRCF homes; however, there are many vulnerable occupancies in London and Middlesex County to which PHIs respond upon receiving reports of potential health hazards. Such reports include factors like unsanitary living conditions, environmental hazards (sewage backup, needle waste, mould), lack of food or unsafe food, unsafe building conditions, pests, lack of heat, sleeping outside the home, and hoarding. On occasion, police have been brought in to address issues of a criminal nature.

There have been many positive outcomes as a result of MLHU intervention in vulnerable occupancies, including the safe relocation of individuals to alternative housing, and the coordination and facilitation of crucial support services to individuals most in need. In 2018, there were nineteen instances in which the Vulnerable Occupancies Protocol (VOP) was activated, resulting in numerous timely and effective interventions. The VOP efforts have strengthened external collaborations and have also helped to identify opportunities for internal collaboration among teams within the Environmental Health and Infectious Disease division on matters such as harm reduction, needle recovery, and emergency and outbreak management where cases have been identified as high risks for the spread of communicable disease. Recently, the Health Unit's Manager of Emergency Preparedness was added to the VOP distribution list to better facilitate activation of the Community Emergency Response Volunteer (CERV) Team where warranted.

As a further measure, the Food Safety and Healthy Environments (FS&HE) team will maintain an inventory of homes in London and Middlesex County that meet the definition of a vulnerable occupancy and apply a risk-based approach that will guide further public health interventions.

Conclusion

The FS&HE team aims to provide more proactive inspection work and consultations with operators and partner agencies so that more group homes become licensed and comply with the requirements set out in the IRCF Licensing By-law CP-21. A risk-based approach will be used to determine whether homes are to receive annual inspections and other environmental health interventions, or if they should simply be inventoried in case future issues arise. It is anticipated that assisted compliance strategies delivered by MLHU staff will help to bring more operators forward for licensing, which will ultimately improve living conditions in homes where our most vulnerable residents reside.

This report was prepared by the Food Safety and Healthy Environments team, Environmental Health and Infectious Diseases Division.



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