

# Agenda Including Addeds

## Community and Protective Services Committee

The 9th Meeting of the Community and Protective Services Committee

May 24, 2023

4:00 PM

Council Chambers - Please check the City website for additional meeting detail information. Meetings can be viewed via live-streaming on YouTube and the City Website.

The City of London is situated on the traditional lands of the Anishinaabek (AUh-nish-in-ah-bek), Haudenosaunee (Ho-den-no-show-nee), Lūnaapéewak (Len-ah-pay-wuk) and Attawandaron (Add-a-won-da-run).

We honour and respect the history, languages and culture of the diverse Indigenous people who call this territory home. The City of London is currently home to many First Nations, Métis and Inuit today.

As representatives of the people of the City of London, we are grateful to have the opportunity to work and live in this territory.

Members

Councillors E. Pelozza (Chair), S. Stevenson, J. Pribil, C. Rahman, D. Ferreira, Mayor J. Morgan

The City of London is committed to making every effort to provide alternate formats and communication supports for meetings upon request. To make a request specific to this meeting, please contact [CPSC@london.ca](mailto:CPSC@london.ca) or 519-661-2489 ext. 2425.

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# Animal Welfare Community Advisory Committee

## Report

The 5th Meeting of the Animal Welfare Community Advisory Committee  
May 4, 2023

Attendance                      PRESENT: W. Brown (Chair), M. Blosch, K. Coulter, A. Hames,  
G. Leckie, M. Toplack and K. Mason (Committee Clerk)

ABSENT: H. Duhamel

ALSO PRESENT: M. McBride, W. Jeffery, B. Westlake-Power

### 1. Call to Order

#### 1.1 Disclosures of Pecuniary Interest

That it BE NOTED that no pecuniary interests were disclosed.

### 2. Scheduled Items

#### 2.1 Update on Bird Friendly Initiative and Receiving Comments on Goldfish Brochure

That it BE NOTED that the Animal Welfare Community Advisory Committee (AWCAC) will submit a formal recommendation to the Environmental Stewardship and Action Community Advisory Committee, regarding AWCAC's comments on the Goldfish Brochure; it being noted that the update from B. Samuels, Chair, Environmental Stewardship and Action Community Advisory Committee on the Bird Friendly Initiative, was received.

### 3. Consent

#### 3.1 4th Report of Animal Welfare Community Advisory Committee

That it BE NOTED that the 4th Report of the Animal Welfare Community Advisory Committee, from its meeting held on April 6, 2023, was received.

#### 3.2 Fire-Safety Strategies for Pets

That the Fire Safety Strategies for Pets BE DEFERRED to the next sub-committee meeting.

### 4. Sub-Committees and Working Groups

#### 4.1 Sub-Committees Update

That it BE NOTED that the verbal update from W. Brown, with respect to the sub-committees, was received.

### 5. Items for Discussion

#### 5.1 Environment and Wildlife

That it BE NOTED that the Chair of the Animal Welfare Community Advisory Committee (AWCAC) will seek to attend the next meeting of the Environmental Stewardship and Action Community Advisory Committee on behalf of AWCAC, to collaborate and discuss issues related to migrating birds.

**6. Adjournment**

The meeting adjourned at 4:24 PM.

## Report to Community and Protective Services Committee

**To:** Chair and Members  
Community and Protective Services Committee

**From:** Cheryl Smith, Deputy City Manager, Neighbourhood and Community-Wide Services

**Subject:** London Fire Department – Establishing and Regulating By-Law

**Date:** May 24, 2023

## Recommendation

That, on the recommendation of the Deputy City Manager, Neighbourhood and Community-Wide Services, the attached proposed by-law (Appendix “A”) **BE INTRODUCED** at the Municipal Council meeting to be held on June 6, 2023, to:

- a) approve the continuation and regulation of the London Fire Department;
- b) repeal By-law No. F-6 being “A by-law to continue and regulate a Fire Department”; and,
- c) provide delegated authority to the Deputy City Manager, Neighbourhood and Community-Wide Services, on the recommendation of the Fire Chief, to form Automatic Aid Agreements, Mutual Aid Agreements and other Fire Protection Agreements as necessary.

## Executive Summary

The focus of this report is to provide Council with the information necessary to approve the attached by-law being “A by-law to continue and regulate the London Fire Department and repeal By-Law No. F-6 in accordance with the *Fire Protection and Prevention Act, 1997, S.O. 1997, c.4.*”

## Previous Reports Pertinent to this Matter

- [Establishing - Regulating By-Law F-1](#) (September 25, 2006)
- [Automatic Aid Agreement with Central Elgin and Termination Agreement Regarding Belmont Area Fire Board](#) (November 12, 2008)
- [Fire Master Plan Action Plan](#) (June 21, 2022)
- [London Fire Department Automatic Aid Agreement with Central Elgin Fire and Emergency Services](#) (November 29, 2022)

## Linkage to the Corporate Strategic Plan

The London Fire Department’s Establishing and Regulating By-Law is aligned with the following strategic area of focus, outcome and expected results from the City of London Strategic Plan 2023-2027:

**Wellbeing and Safety:** London has safe, vibrant and healthy neighbourhoods and communities.

- Londoners feel safe across the city, in the core, and in their neighbourhoods and communities.
- Improved emergency services response time and reporting.

# Analysis

## 1.0 Background Information

### 1.1 Context

The *Fire Protection and Prevention Act, 1997*, S.O. 1997, c.4, as amended (FPPA) provides direction to Council regarding the provision of Fire Protection Services. It states,

Municipal responsibilities:

2 (1) Every municipality shall,

(a) establish a program in the municipality which must include public education with respect to fire safety and certain components of fire prevention; and

(b) provide such other fire protection services as it determines may be necessary in accordance with its needs and circumstances.

“Needs” can be defined as being what a review of past responses and fire prevention related data provide and then estimating what they will be alongside circumstances.

“Circumstances” being what the community can afford to provide as a level of service.

Fire protection services is a defined term within the FPPA.

“fire protection services” includes,

- a) fire suppression, fire prevention and fire safety education,
- b) mitigation and prevention of the risk created by the presence of unsafe levels of carbon monoxide and safety education related to the presence of those levels,
- c) rescue and emergency services,
- d) communication in respect of anything described in clauses (a) to (c),
- e) training of persons involved in providing anything described in clauses (a) to (d), and
- f) the delivery of any service described in clauses (a) to (e).

In providing fire protection services based off needs and circumstances it is Council that sets the level of service provided by the London Fire Department and is outlined within a By-Law.

## 2.0 Discussion and Considerations

### 2.1 The Fire Master Plan Action Plan

The Council approved Fire Master Plan Action Plan (June 2022) provides direction to review and update By-law No. F-6 being “A by-law to continue and regulate a Fire Department” as a strategic priority. The action noted within the plan states:

Conduct a full review of By-law No. F-6 being “A by-law to continue and regulate a Fire Department” document and update it to ensure that Council’s requirements for the current level of service are provided.

In review of the needs, as described above, the attached proposed by-law (Appendix “A”) outlines the services offered by the London Fire Department to provide for these needs. The proposed by-law provides the details in relation to the services in accordance with the direction provided through the Office of the Fire Marshal (Public

Fire Safety Guideline 01-03-12). Included in the definition of fire protection services, the London Fire Department has been functioning for many years as a full function Fire Department. This means that all components that are required by legislation are in compliance with the FPPA along with service level capabilities that meet the local needs.

Within Schedule “A” of the proposed by-law, emergency response levels are outlined that represent the key historical response types that London Fire Department has capabilities for and can effectively respond.

In the provision of services, the London Fire Department has a number of agreements that aid in the provision of service. These currently include:

- Middlesex County Mutual Aid Plan (provide and receive service)
- Central Elgin Automatic Aid Agreement (receive service)
- Thames Centre Automatic Aid Agreement (provide service)
- Middlesex Centre Automatic Aid Agreement (provide service)

The Central Elgin Automatic Aid Agreement was updated in November 2022. An action within the Fire Master Plan notes to, “Review and update the Middlesex and Thames Centre aid agreements.”

Providing delegated authority to the Deputy City Manager, Neighbourhood and Community-Wide Services, on the recommendation of the Fire Chief, to form Automatic Aid Agreements, Mutual Aid Agreements, and other Fire Protection Agreements as necessary will decrease the administrative burden and provide a more efficient renewal process.

## **2.2 Legislative changes**

In May 2018 the Provincial Government enacted under the FPPA [O. Reg 378/18 Community Risk Assessments](#). A requirement of the Regulation is to have a first risk assessment completed by July 1, 2024. This Community Risk Assessment “is a process of identifying, analyzing, evaluating and prioritizing risks to public safety to inform decisions about the provision of fire protection services.” (O. Reg 378/18 2(1)). A Community Risk Assessment was completed for the City of London in support of the Fire Master Plan in 2022. These documents aided in the development of the attached proposed by-law.

In April 2022, the Provincial Government enacted under the FPPA [O. Reg 343/22 Firefighter Certification](#). A requirement of the Regulation is to ensure all personnel are certified in the provision of service. As set out in the schedule of the Regulation there are currently 15 categories and a total of 24 programs that the London Fire Department currently provides as a service level. As such, the personnel providing these services must be certified by the compliance deadline to the programs that they represent. As such, the attached proposed by-law specifies not only the level of service provided, but also the level of certification the practitioner must have.

## **2.3 Next Steps**

### **Regular housekeeping**

The historical Middlesex County Mutual Aid Plan (By-Law Oct 2006) has been updated in 2023 by all fire departments partnered in the local plan. A formalized updated agreement to be a participant in the plan is recommended.

Discussions with Thames Centre and Middlesex Centre will commence to establish and update the Automatic Aid Agreements.

Other Fire Protection Agreements may be required. For example, this could include the utilization of the Fire Training Division and site for regional training opportunities.

This would be in accordance with the Fire Master Plan Action plan strategic priorities:

- Continue to use the current training facility's resources and identify ongoing joint opportunities to enhance the use and possible revenue generation of the facility.
- Ensure all personnel are trained and certified to the standards outline in accordance with the Firefighter Certification Regulation.

### **3.0 Financial Impact/Considerations**

There is no financial impact as a result of this by-law update. Any future changes to the London Fire Department service levels will be articulated and provided for through the Multi-Year Budget process.

## **Conclusion**

It is recommended that the attached proposed by-law (Appendix "A") being "A to continue and regulate the London Fire Department and repeal By-law No. F-6" be enacted. The London Fire Department priority has been, and will continue to be, positioning the LFD as a leader in fire service providing exceptional service to London residents while ensuring a workplace where people feel proud, safe, and engaged.

**Prepared and Submitted by: Richard Hayes, Acting Fire Chief**

**Recommended by: Cheryl Smith, Deputy City Manager,  
Neighbourhood and Community-Wide Services**

c: Jason Davies, Manager III, Financial Planning and Policy, Finance Supports  
Steve Mollon, Senior Manager, Procurement and Supply, Finance Supports  
Vanetia R, Solicitor I, Legal Services  
Jason Wills, Manager III, Risk Management, Legal Services

Bill No.

By-Law No.

A by-law to regulate the London Fire Department and repeal By-law No.F-6.

WHEREAS section 2(1) of the *Fire Protection and Prevention Act, 1997*, S.O. 1997, c.4 as amended, provides that every municipality shall establish a program in the municipality which must include public education with respect to fire safety and certain components of fire prevention, and every municipality shall provide such other fire protection services as it determines may be necessary in accordance with its needs and circumstances;

AND WHEREAS section 2(2) of the *Fire Protection and Prevention Act, 1997*, as amended, provides for the establishment of a municipal fire department;

AND WHEREAS subsection 5(0.1) of the *Fire Protection and Prevention Act, 1997*, as amended, provides that a council of a municipality may establish, maintain and operate a fire department, and subsection 5(1) of the that Act provides that a fire department shall provide for fire suppression services and may provide other fire protection services in a municipality;

AND WHEREAS subsection 7.1(a) of the *Fire Protection and Prevention Act, 1997*, as amended, provides that a council of a municipality may pass by-laws regulating fire prevention, including the prevention of the spreading of fires;

AND WHEREAS Section 9 of the *Municipal Act, 2001*, S.O. 2001, c. 25, provides that a municipality has the capacity, rights, powers and privileges of a natural person for the purpose of exercising its authority under the Act;

AND WHEREAS s. 100 of the *Environmental Protection Act, R.S.O. 1990*, c. E.19, as amended, provides that, where a pollutant is spilled and causes or is likely to cause an adverse effect, a municipality may do everything practicable to prevent, eliminate and ameliorate the adverse effects and to restore the natural environment;

THEREFORE the Municipal Council of the Corporation of the London enacts as follows:

### **Definitions**

1. In this by-law, unless the context otherwise requires,

**“Approved”** means approved by the *Council*;

**“City”** means The Corporation of the City of London;

**“Collective Agreement”** means an agreement in writing pursuant to the provisions of the *Fire Protection and Prevention Act, 1997* between the City and the Firefighters’ Association containing provisions respecting terms and conditions of employment and the rights, privileges and duties of the City, the Firefighters’ Association and its members;

**“Council”** means the municipal council of the City of London;

**“Deputy City Manager - Neighbourhood and Community-Wide Services”** means the person(s) appointed by *Council* as a Deputy City Manager reporting to the City Manager;



**“Fire Chief”** means the person appointed by *Council* to act as *Fire Chief* for the *City* as defined in the *Fire Protection and Prevention Act, 1997*;

**“Fire Department”** means the fire department of the *City*, known as the London Fire Department;

**“Firefighters’ Association”** means the London Professional Fire Fighters’ Association;

**“Fire Protection Services”** services outlined within the body of the By-Law and within Schedule “A” and includes,

- (a) fire suppression, fire prevention and fire safety education,
- (b) mitigation and prevention of the risk created by the presence of unsafe levels of carbon monoxide and safety education related to the presence of those levels,
- (c) rescue and emergency services,
- (d) communication in respect of anything described in clauses (a) to (c),
- (e) training of persons involved in providing anything described in clauses (a) to (d), and
- (f) the delivery of any service described in clauses (a) to (e)

**“London”** means the geographic area of *The Corporation of the City of London*;

**“Personnel”** means any persons employed in, or appointed to, the *Fire Department* and assigned to undertake *Fire Protection Services*, and includes *administrative support and clerical staff*;

**“Rescue and Emergency Services”** includes any life or property saving activity that is unrelated to fire suppression and fire prevention.

### ***Establishment of Fire Department***

2. A *Fire Department* to be known as the London Fire Department is hereby continued and enacted to provide *Fire Protection Services* for the *City*, and the head of the *Fire Department* shall be the *Fire Chief*.

### ***Organization***

3. The organizational structure of the *Fire Department* is outlined by the Organizational Chart within Schedule B of this By-Law and shall consist of the following divisions:
  - a. Fire Prevention & Public Education
  - b. Fire Suppression
  - c. Training
  - d. Communications
  - e. Apparatus
  - f. Clerical/Administrative
  - g. Parts/Stores
4. The *Fire Chief*, with the prior approval of the Deputy City Manager, may reorganize or eliminate divisions or establish other divisions or may do all or any of these things or any combination of them as may be required to ensure the proper administration and efficient operation of the *Fire Department*.
5. In addition to the *Fire Chief* and the Deputy *Fire Chiefs*, the *Fire Department* shall consist of such number of officers and Members as from time to time may be deemed necessary by the Council.

## **Responsibilities of the Fire Chief**

6. The *Fire Chief* shall be ultimately responsible to *Council* for the proper administration and operation of the Fire Department including the delivery of *Fire Protection Services* and, under the general direction of the Deputy City Manager, shall:
- (a) ensure compliance with the Community Risk Assessment O.Reg 378/18 in the development and review of the Community Risk Assessment;
  - (b) ensure that personnel providing Fire Protection Services are certified in the programs outlined by Firefighter Certification O.Reg 343/22 and to the level expressed within Schedule A of this By-Law;
  - (c) implement all *approved* policies, procedures, and guidelines, and may develop such policies, procedures, and guidelines, general orders and departmental rules as necessary to implement the aligned Corporate policies and procedure as well as to ensure for the appropriate care and protection of all *Fire Department* personnel and *Fire Department* equipment and for the efficient operation of the Fire Department, provided that such policies, procedures, guidelines, orders, and rules do not conflict with the provisions of any laws, by-laws of the municipality, or the Collective Agreement;
  - (d) review periodically the policies, procedures, and guidelines of the London Fire Department and may establish processes that involves such personnel of the Fire Department as may be determined from time to time to assist in these duties;
  - (e) take all proper measures for the education, prevention, control and extinguishment of fires and the protection of life and property, including exercising all powers mandated by the *Fire Protection and Prevention Act, 1997*;
  - (f) enforce all municipal by-laws, policies, procedures, and guidelines respecting fire prevention;
  - (g) adhere to the provisions of the *Fire Protection and Prevention Act, 1997*;
  - (h) prepare and submit to the Deputy City Manager and Council for approval, the annual budget estimates for the Fire Department;
  - (i) prepare and submit to the Deputy City Manager and to Council an annual report on the Fire Department and any other specific reports requested by the Deputy City Manager, a committee of Council, or *Council*; and
  - (j) perform such other duties and responsibilities as directed by Council and/or the Deputy City Manager from time to time.

## **Authority of the Fire Chief**

7. In accordance with the provisions of the *Fire Protection and Prevention Act, 1997*, the Fire Chief is authorized to do, among other things, the following:
- (a) the Fire Chief, or such other persons as may be authorized by the Fire Chief, may enter on lands or premises on which a fire is occurring, or that are adjacent to those lands or premises, for the purposes of pulling down or removing buildings, structures or things on or attached to the lands or premises on which a fire is occurring or that are adjacent to those lands or premises if, in the opinion of the Fire Chief, it is necessary to do so to prevent the spread of fire;

- (b) the Fire Chief may close and prevent entry to the land or premises for the length of time necessary to complete an examination of the land or premises where: (i) a fire has occurred on the land or premises, or (ii) the Fire Chief has reason to believe that a substance or device that is likely to cause a fire may be situated on the land or premises;
  - (c) the Fire Chief may do any thing that the Fire Chief has reasonable grounds to believe is urgently required to remove or reduce an immediate threat to life where the Fire Chief has reasonable grounds to believe that a risk of fire poses an immediate threat to life, and the Fire Chief shall promptly give notice to the owner if the owner's whereabouts in Ontario are known.
8. The Fire Chief or such other officers or personnel as may be designated from time to time by the Fire Chief, may take any necessary actions to prevent fires, including boarding up or barricading of buildings, structures or things on or attached to the lands.

***Divisional Responsibilities Designated by Fire Chief***

9. Each Division of the *Fire Department* is the responsibility of the *Fire Chief* and is under the direction of the *Fire Chief* or their designate. Designates shall report to the *Fire Chief* on Divisions and activities under their supervision and shall carry out all orders of the *Fire Chief*.

***Appointment and Discipline of Personnel***

10. The Fire Chief may appoint a person to the Fire Department, subject to and in accordance with the hiring policies of the City of London and the Firefighter Certification O. Reg 342/22.
11. Every person appointed as personnel of the Fire Department, save and except for those management employees excluded from the bargaining unit as defined in the Collective Agreement, shall be on probation for a period of twelve (12) months, during which period the probationary person shall take such training and undergo such examinations as may be required or directed by the Fire Chief as a condition of being eligible for appointment as regular, non-probationary personnel.
12. The remuneration for all bargaining unit members may be determined from time to time by agreement between the City and the Firefighters' Association as recorded in the Collective Agreement. The remuneration of all non-bargaining unit personnel shall be as determined by Council from time to time.
13. Subject to the provisions of the *Fire Protection and Prevention Act, 1997* and any applicable provisions of the Collective Agreement, the *Fire Chief* may reprimand, suspend, dismiss and otherwise discipline any personnel for non-compliance with or contravention of any law, by-law, policies, procedures, guidelines, general orders, or departmental rules.

***Owner Required to Take Necessary Actions***

14. (a) The owner of a property is required to take any necessary actions required by the Fire Chief, or such other officer or personnel as may be designated from time to time by the Fire Chief, to prevent fires, including boarding up or barricading buildings, structures, or things.
- (b) Where the owner does not take the necessary actions required in subsection 14(a) to prevent fires, the Fire Chief or such other officer or personnel as may be designated from time to time by the Fire Chief, may authorize the work to be done at the owner's expense.
- (c) The City may recover the costs of doing the work in subsection 14(b) from the owner: (i) by action or by adding the costs to the tax roll and collecting them in

the same manner as taxes, in accordance with section 427 of the *Municipal Act, 2001*; or (ii) in the manner provided in the *Fire Protection and Prevention Act, 1997*.

**Authority to Leave Municipal Limits**

15. The Fire Department may enter onto lands or premises that are situated outside the municipal boundaries of the City if:
  - (a) in the opinion of the Fire Chief, the fire or emergency threatens persons, property or the environment within the City and there is no fire department or other emergency response capability for the area in which the lands or premises are situated; or
  - (b) the City has entered into an automatic aid agreement to provide an initial or supplemental response to fires, rescues and emergencies, under which the entry is permitted; or
  - (c) the City has entered into an agreement to provide fire protection services, for the purposes of fighting a fire, or of providing rescue or emergency services, as specified in the agreement, under which the entry is permitted; or
  - (d) a mutual aid plan is established under which the fire departments that serve the designated area, as designated by the Fire Marshal, agree to assist each other in the event of an emergency.
16. The short title of this by-law is The Fire Department By-law.
17. By-law F-6, being “A by-law to continue and regulate a Fire Department” and all amendments thereto are hereby repealed.
18. This by-law comes into force and effect on the day it is passed.

PASSED in Open Council , 2023.

Josh Morgan  
Mayor

Michael Schulthess  
City Clerk

First reading -  
Second reading -  
Third reading –

## Schedule A: Fire Protection Services

Fire Protection Services	Minimum Certification Standard	Certification Compliance Deadline
Firefighter Interior Attack, auto extrication and hazardous materials response: Fire suppression operations that enter the interior of the building and can perform rescue, automobile extrication rescue and Operations-level hazardous materials response (full-service firefighter).	All job performance requirements of NFPA 1001, "Standard for Fire Fighter Professional Qualifications", 2019 Edition, Chapter 5 (Firefighter II).	1-Jul-26
Team Lead Interior Attack, auto extrication and hazardous materials response: Supervision of firefighters that provide fire suppression operations from the interior of the building and can perform rescue or that provide automobile extrication rescue or Operations-level hazardous materials response (full-service fire officer).	All job performance requirements of NFPA 1021 "Standard for Fire Officer Professional Qualifications", 2020 edition, Chapter 4 (Fire Officer I).	1-Jul-26
Pump Operations: driver: Driving and operating a pumper apparatus that requires a class D licence. London Fire Department also requires Z endorsement	All job performance requirements in NFPA 1002 "Standard for Fire Apparatus Driver/Operator Professional Qualifications", 2017 Edition, Chapter 5 (Apparatus Equipped with Fire Pump).	1-Jul-26
Fire Prevention/Inspection Level I: conducting fire and life safety inspections.	All job performance requirements of NFPA 1031, "Standard for Professional Qualifications for Fire Inspector and Plan Examiner", 2014 Edition, Chapter 4 (Fire Inspector I).	1-Jul-26
Fire Prevention/Inspection Level II: conducting fire and life safety inspections including in facilities that store, handle, or use flammable/combustible liquids.	All job performance requirements in item 19 and NFPA 1031, "Standard for Professional Qualifications for Fire Inspector and Plan Examiner", 2014 Edition, Chapter 5 (Fire Inspector II).	1-Jul-26
Fire Investigator: conducting fire cause and origin investigations.	All job performance requirements of NFPA 1033, "Professional Qualifications for Fire Investigator", 2014 Edition, Chapter 4 (Fire Investigator).	1-Jul-26
Fire and Life Safety Educator: providing fire and life safety education.	All job performance requirements of NFPA 1035, "Standard on Fire and Life Safety Educator, Public Information Officer, Youth Fire setter Intervention Specialist, and Youth Fire setter Program Manager Professional Qualifications", 2015 Edition, Chapter 4 (Fire and Life Safety Educator I).	1-Jul-26

<b>Fire Protection Services</b>	<b>Minimum Certification Standard</b>	<b>Certification Compliance Deadline</b>
Training Officer Level I: providing training and education to other fire personnel.	All job performance requirements of NFPA 1041, “Standard for Fire and Emergency Services Instructor Professional Qualifications”, 2019 Edition, Chapter 4 (Fire and Emergency Services Instructor I).	1-Jul-26
Training Officer Level II: providing training and education to other fire personnel including lead instructor roles at live fire and above or below grade technical rescue practical training.	All job performance requirements in item 23 and NFPA 1041, “Standard for Fire and Emergency Services Instructor Professional Qualifications”, 2019 Edition, Chapter 5 (Fire and Emergency Services Instructor II).	1-Jul-26
Emergency Communicators Level I: taking emergency calls.	All job performance requirements of NFPA 1061, “Standard for Public Safety Telecommunications Personnel Professional Qualifications”, 2018 Edition, Chapter 4 (Public Safety Telecommunicator I).	1-Jul-26
Emergency Communicators Level II: taking emergency calls and dispatching emergency vehicles.	All job performance requirements in item 25 and NFPA 1061, “Standard for Public Safety Telecommunications Personnel Professional Qualifications”, 2018 Edition, Chapter 5 (Public Safety Telecommunicator II).	1-Jul-26
Incident Safety Officers: undertaking the primary role of incident safety officer at emergency calls.	All job performance requirements of NFPA 1521, “Standard for Fire Department Safety Officer Professional Qualifications”, 2020 Edition, Chapter 5 (Incident Safety Officer).	1-Jul-26
Hazardous Materials Response — Operations Mission Specific Level: responding to emergencies involving hazardous materials at the Operations Mission Specific Level.	All job performance requirements of NFPA 1072, “Standard for Hazardous Materials/Weapons of Mass Destruction Emergency Response Personnel Professional Qualifications”, 2017 Edition, Chapter 6 (Operations Mission Specific)	1-Jul-26
Hazardous Materials Response — Technician Level: responding to emergencies involving hazardous materials at the Technician Level.	All job performance requirements of NFPA 1072, “Standard for Hazardous Materials/Weapons of Mass Destruction Emergency Response Personnel Professional Qualifications”, 2017 Edition, Chapter 7 (Hazardous Materials Technician).	1-Jul-26
Rope Rescue — Operations: rope rescue at the Operations Level.	The following job performance requirements of NFPA 1006, “Standard for Technical Rescue Personnel Professional Qualifications”, 2021 Edition, Chapter 5 (Rope Rescue) (Operations): 5.2	1-Jul-28

<b>Fire Protection Services</b>	<b>Minimum Certification Standard</b>	<b>Certification Compliance Deadline</b>
Rope Rescue — Technician: rope rescue at the Technician Level.	The following job performance requirements of NFPA 1006, “Standard for Technical Rescue Personnel Professional Qualifications”, 2021 Edition, Chapter 5 (Rope Rescue) (Technician): 5.3	1-Jul-28
Confined Space — Operations: confined space rescue at the Operations Level.	The following job performance requirements of NFPA 1006, “Standard for Technical Rescue Personnel Professional Qualifications”, 2021 Edition, Chapter 7 (Confined Space Rescue) (Operations): 7.2	1-Jul-28
Confined Space — Technician: confined space rescue at the Technician Level.	The following job performance requirements of NFPA 1006, “Standard for Technical Rescue Personnel Professional Qualifications”, 2021 Edition, Chapter 7 (Confined Space Rescue) (Technician): 7.3	1-Jul-28
Surface Water Rescue — Operations: surface water rescue at the Operations Level.	The following job performance requirements of NFPA 1006, “Standard for Technical Rescue Personnel Professional Qualifications”, 2021 Edition, Chapter 17 (Surface Water Rescue) (Operations): 17.2	1-Jul-28
Surface Water Rescue — Technician: surface water rescue at the Technician Level.	The following job performance requirements of NFPA 1006, “Standard for Technical Rescue Personnel Professional Qualifications”, 2021 Edition, Chapter 17 (Surface Water Rescue) (Technician): 17.3	1-Jul-28
Swift Water Rescue — Operations: swift water rescue at the Operations Level.	The following job performance requirements of NFPA 1006, “Standard for Technical Rescue Personnel Professional Qualifications”, 2021 Edition, Chapter 18 (Swiftwater Rescue) (Operations): 18.2	1-Jul-28
Swift Water Rescue — Technician: swift water rescue at the Technician Level.	The following job performance requirements of NFPA 1006, “Standard for Technical Rescue Personnel Professional Qualifications”, 2021 Edition, Chapter 18 (Swiftwater Rescue) (Technician): 18.3	1-Jul-28
Ice Water Rescue — Operations: ice water rescue at the Operations Level.	The following job performance requirements of NFPA 1006, “Standard for Technical Rescue Personnel Professional Qualifications”, 2021 Edition, Chapter 20 (Ice Rescue) (Operations): 20.2	1-Jul-28

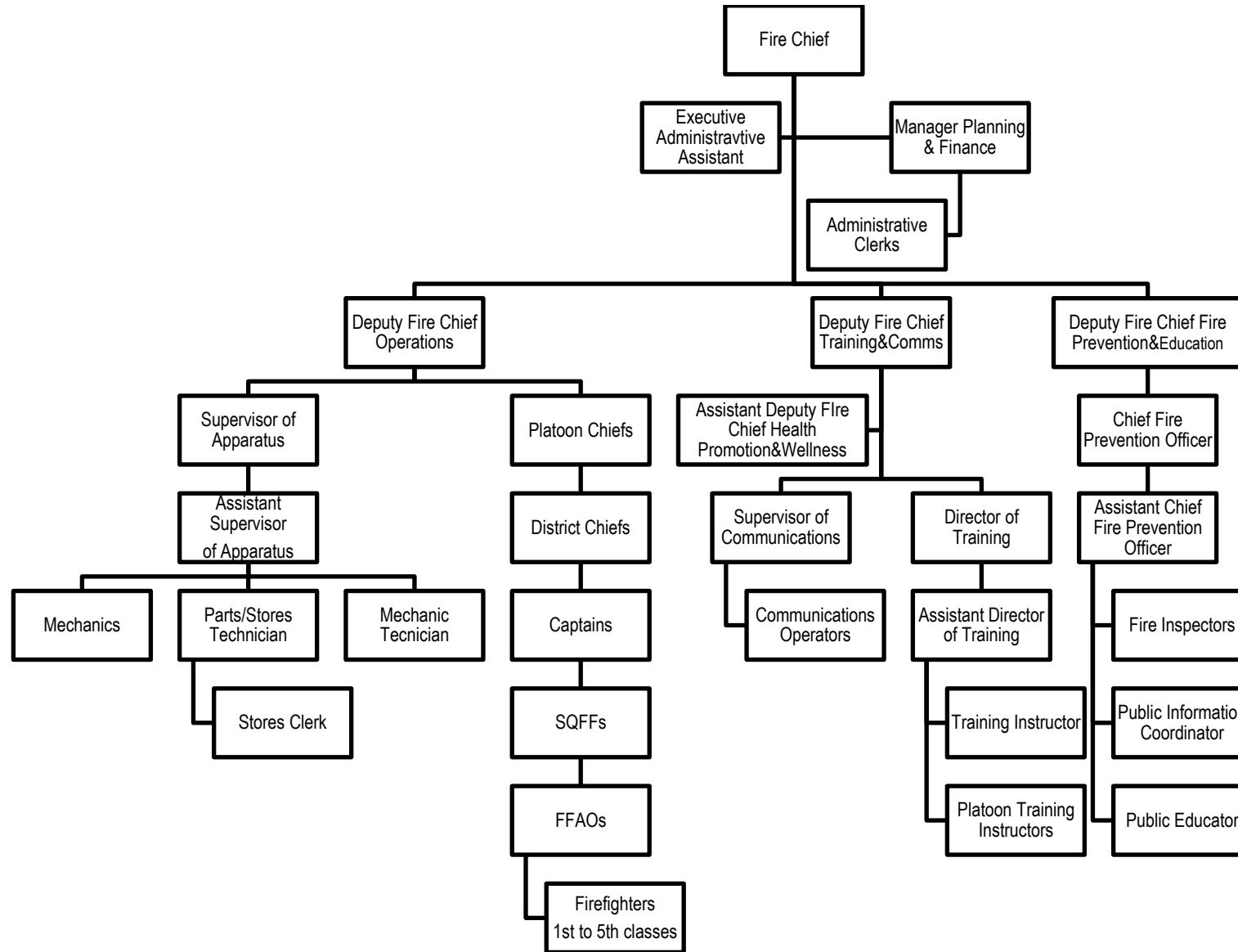
Fire Protection Services	Minimum Certification Standard	Certification Compliance Deadline
Ice Water Rescue — Technician: ice water rescue at the Technician Level.	The following job performance requirements of NFPA 1006, “Standard for Technical Rescue Personnel Professional Qualifications”, 2021 Edition, Chapter 20 (Ice Rescue) (Technician): 20.3	1-Jul-28

Fire Protection Services not included in the Firefighter Certification O. Reg 343/22 outline above,

- Tiered Medical Response
- Greater London International Airport Authority Emergency Assistance



**Schedule B: London Fire Department Organizational Chart**



## Report to Community and Protective Services Committee

**To:** Chair and Members,  
Community and Protective Services Committee Meeting  
**From:** Kevin Dickins, Deputy City Manager, Social and Health  
Development  
**Subject:** Housing Stability for All Plan 2022 Update  
**Date:** May 24, 2023

## Recommendation

That, on the recommendation of the Deputy City Manager, Social and Health Development, and with the concurrence of the Deputy City Manager, Planning and Economic Development, that the Housing Stability for All Plan 2022 Update report, **BE RECEIVED** for information purposes and that the following actions **BE TAKEN** with respect to this report;

- a) Civic Administration **BE DIRECTED** to submit the Housing Stability for All Plan (HSAP) 2022 Update to the Ontario Ministry of Municipal Affairs and Housing as the annual update to the local homeless prevention and housing plan, in accordance with the Housing Services Act, 2011 (HSA); and,
- b) Civic Administration **BE DIRECTED** to circulate this report to community and affected partners, agencies, and community groups including, but not limited to, Middlesex County, the London Homeless Coalition and on the City of London website.

## Executive Summary

This is the third annual report on the Housing Stability for All: The Housing Stability Action Plan for the City of London, 2019-2024 (HSAP). 2022 metrics and initiatives are outlined as attached in Appendix A, attached to this report.

As Consolidated Municipal Service Manager (CMSM), The City of London is required to submit an annual update on the local homeless prevention and housing plan to the Ontario Government, as required under the Housing Services Act (HSA), 2011. This plan must include updates pertaining to and reflecting Middlesex County as well.

Updates in this report are specific to the HSAP and align with the City of London's Multi-Year Strategy, noting that the metrics and reporting periods for City of London Strategic Plan may overlap or vary. The next HSAP update report will be provided in 2024 and the final report in 2025.

## Linkage to the Corporate Strategic Plan

This report aligns with the strategic areas of 2023-2027 [City of London Strategic Plan](#).

The City of London is a sustainable city within a thriving region, committed to culture, innovation and providing a safe, affordable, welcoming, and healthy future for today and for the next generation.

### Housing and Homelessness

- Increased access to a range of quality, affordable, and supportive housing options that meet the unique needs of Londoners.
- Decreased number of Londoners at risk of or experiencing homelessness
- Improved safety in London's shelters system

## Wellbeing and Safety

- Londoners have safe access to public spaces, services, and supports that increase wellbeing and quality of life
- Housing in London is affordable and attainable

## Links to Community Recovery:

The City of London is committed to working in partnership with the community to identify solutions that will drive a strong, deep, and inclusive community recovery for London as we move out of and beyond the global COVID-19 pandemic. This report, and the items within, are linked to supporting Londoners experiencing homelessness to attain and retain permanent housing. This work supports recovery efforts through a coordinated response that will support the transition of individuals and families experiencing or at risk of experiencing homelessness who have a variety of support needs into permanent housing.

## Analysis

### 1.0 Background Information

#### 1.1 Previous Reports Related to this Matter

- [Progress Update- Health & Homelessness](#) (SPPC: May 9, 2023)
- [People Centred and Housing Centric: Health & Homelessness in London, Ontario: A Whole of Community System Response](#) (February, 2023)
- [Update on the Roadmap to 3,000 Affordable Units \(CPSC: November 01, 2022\);](#)
- [Housing Stability for All Plan 2020 Update](#) (CPSC: May 31, 2022)
- [Housing Stability for All Plan - Mid-Year Update](#) (CPSC: September 21, 2021)
- [Housing Stability for All Plan 2020 Update](#) (CPSC: May 11, 2021)
- [Letter of Mayor Holder to CPSC Re: 3000 Unit Challenge](#) (CPSC: March 30, 2021)
- [Municipal Council Approval of the Housing Stability Plan 2019 to 2024](#) (CPSC: December 3, 2020)
- [Update on Urgent Transitional and Modular Supported Housing Development Report on July 15, 2020](#) (CPSC: December 15, 2020)
- [Housing Quarterly Report](#) (CPSC: October 6, 2020)
- [Housing Quarterly Report](#) (CPSC: July 15, 2020)
- [Municipal Council Approval of the Housing Stability Plan 2019 to 2024...](#) (CPSC: December 3, 2019)
- [City of London Housing Services Review: Proposed Action Plan](#) (SPPC: September 16<sup>th</sup>, 2019)
- [Homeless Prevention and Housing Plan 5 Year Review and Update](#) (CPSC: June 17, 2019)

### 2.0 Discussion and Considerations

#### 2.1 Overview of Housing Stability Action Plan

The HSAP<sup>1</sup> is a strategic framework guiding activities across the municipal housing and homelessness system in support of housing stability within the City of London and Middlesex County from 2019-2024. The HSAP is a plan of action that calls on all services, sectors, governments and residents to address the rapidly changing and complex housing stability needs of individuals and families. The HSAP was developed in consultation with Londoners.

The HSAP report outlines four strategic areas of focus with related priority actions and measures. The strategic areas of focus are:

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<sup>1</sup> <https://www.london.ca/residents/Housing/Housing-Management/Documents/2020-01-24%20181029038-COL-Homeless-Prevention-And-Housing-Plan-Report-EMAIL-WEB.PDF>

- Respond to the Homeless Crisis
- Create more Housing Stock
- Provide Housing Supports
- Transform the Service System

In 2022, there was continued movement on the actions in the HSAP. Civic administration worked closely across internal teams and with community partners to implement programs and projects aimed at housing stability.

Up to this reporting period, approximately 86% of the actions progressed or were completed. A breakdown of the status for the total 117 actions in the HSAP plan in this period are:

- 82 (or 70.1%) actions are completed and ongoing
- 30 (or 25.6%) actions are in progress
- 5 (or 4.3%) actions have been identified with future targets

Details about the HSAP actions under the four strategic areas of focus and outcomes are included in detail as attached in Appendix A. Sections 2.2 to 2.5 of this report summary key findings for each strategic area of focus.

## 2.2 Respond to the Homeless Crisis

London is experiencing a homelessness crisis. In 2022, 4923 individuals appeared on London's By-Name List of people experiencing homelessness and of those 790 individuals slept unsheltered<sup>2</sup>. Efforts were taken to address the complex range of issues that contribute to homelessness and to support individuals and families to secure and maintain housing. A small sampling of work underway includes:

- Diverted 583 individuals from an experience of homelessness, including 367 diverted by Coordinated Access,
- Housed 359 individuals from the By-Name List of individuals and families experiencing homelessness and 430 households from the Housing Waitlist,<sup>3</sup>
- Adjusted the administrative encampment protocol tool based on feedback,
- Continued work on shelter transformation aimed at creating shelter services focused on lower barrier access and housing stability for individuals and families,
- Maintained functional zero for Veterans homelessness ensuring no greater than three Veterans experiencing homelessness at time.

In 2022, there was a recognition that no one group could solve homelessness alone. As in many other regions, the City of London is experiencing a health and homelessness crisis. The challenges in the collective ability across sectors to provide timely and appropriate supports for people experiencing the impacts of health and homelessness are growing. Throughout 2022, Londoners from all sectors and backgrounds said loud and clear that something needed to change, to save lives, to better deliver healthcare and housing for the most marginalized community members in London, and to address the whole of community impacts of this crisis.

This call for change led to London's Health and Homelessness Summits and the Whole of Community System Response. Throughout 2023 and into 2024, Civic Administration will work to align existing Municipal plans and resources to align with the work of the new Health and Homelessness System. The update of the Housing Stability Action Plan will focus on aligning strategies and resources with the community priorities identified through the health and homelessness summit and ongoing community consultation.

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<sup>2</sup> Individuals may have been on the By-Name List for one or 365 days in 2022. In the period between February 1 and April 30, 2023 2757 people appeared on the By-Name List and 228 people slept unsheltered.

<sup>3</sup> Some households may be included in the By-Name List number and the Housing Waitlist number.

### **2.3 Create More Housing Stock**

London is experiencing low vacancy rates and increasing rental costs. A spectrum of housing options is required to meet the needs of Londoners, including units that are affordable. In 2022, significant work was completed to work towards increasing housing stock, including:

- \$2.7M was available and allocated to 13 different community housing providers to address capital repairs which improved approximately 611 household units. Investments included balcony & brick repairs, electrical upgrades, windows & doors, and upgrades to kitchens and bathrooms.
- A 4 storey, 44-unit affordable housing apartment building was completed at 403 Thompson Road, with occupancy granted in early 2023.
- A municipal land asset at 345 Sylvan Street was prepared to shovel-readiness for a 3 storey, 42-unit affordable housing apartment building;
- Pre-planning application activities and due diligence undertaken for municipal land assets located at 1364 Hyde Park Road and 1958 Duluth Street;
- A municipal land asset at 18 Elm Street was brought to shovel-readiness. Ontario Aboriginal Housing Services is pursuing the redevelopment of the municipally acquired surplus school site for a 4 storey, 42-unit, mixed-use apartment building;
- A \$13.8 Million investment in the Vision SOHO project was approved by Council to bring on affordable housing through a unique partnership with 6 non-profit housing developers. Site Plan applications were approved, and construction is anticipated in 2023.
- 13 Bonus Zones were negotiated and approved by Council, of which 11 are in force and effect collectively serving to provide for a total of 124 affordable housing units when the lands are developed in the future.
- Planning permissions to provide for the multi-phased regeneration of LMCH's Southdale Road Townhouse site were advanced.

### **2.4 Provide Housing Supports**

Londoners require the right level of support to maintain their housing.

- HSS in partnership with the housing support programs hosted a barbeque at 122 Baseline to welcome new tenants to their home and community. Housing support programs provide in-home support for the 61 units at Baseline aimed at housing stability and successful tenancy.
- Began the expansion of the Housing Identification Program (HIP). The expansion will take place over the next couple of years. The outcome of the expansion will be that the HIP will provide housing allowance administration and landlord support for housing support programs serving households with high support needs in addition to its current role supporting programs serving households with low and moderate acuity.
- Rolled out 4 mental health support training sessions to housing providers with approximately 63 attendees representing 16 housing providers.
- Community Housing Bridge Program continues to support households through portable housing allowances. In 2022, 54 households were assisted in providing a monthly housing supplement to improve their housing stability situation.

### **2.5 Transform the Service System**

In the rapidly changing landscape, it is important to continue to adapt the way the City of London addresses housing and homelessness. In 2022, work was completed to continue aligning Housing Stability Services with Canadian best practices in solving homelessness.

- Municipal Housing Development and Housing Stability Services began a lean process to review service areas and identify areas where there were opportunities for improvement to better serve Londoners.
- Housing Stability Services participated in the Built for Zero, a national initiative focused on reducing Chronic and Veteran homelessness across Canada.
- Municipal Housing Development began work on aligning the former Housing Development Corporation procedures with the City of London's Council approved policies.
- Through the Health and Homelessness Summit, experts from across the various sectors started having meaningful conversations about how to change the local system.

### **3.0 Financial Impact/Considerations**

There are no financial impacts.

### **4.0 Key Issues and Considerations**

In late 2023, Civic Administration will begin the development of a five-year plan to guide the work of Housing Stability Services between 2025 and 2030. The development of an updated HSAP will include broad community consultation with a wide range of community members and affected groups. The updated plan will include alignment with strategies underway including the All of Community Response and the Roadmap to 3000.

#### **4.1 Middlesex County Update**

Middlesex County has made significant progress towards the County Housing and Homeless Plan in 2022. Middlesex County Housing and Homelessness Plan 2022 updates and achievements are included as attached in Appendix B of this report.

## **Conclusion**

Municipal Council will continue to receive housing stability related reporting on initiatives over the coming year. Civic Administration, agencies and partners will continue to implement the actions of the HSAP aiming to increase housing stability and affordable housing stock for individuals and families in our community. The next HSAP update will be provided in 2024 and the final update will be provided in 2025.

<b>Prepared by:</b>	<b>Laura Cornish, Manager, Housing Stability Services</b>
<b>Submitted by:</b>	<b>Craig Cooper, Director, Housing Stability Services Matt Feldberg, Director, Municipal Housing Development</b>
<b>Recommended by:</b>	<b>Kevin Dickins, Deputy City Manager, Social and Health Development</b>
<b>Concurred by:</b>	<b>Scott Mathers, Deputy City Manager, Planning and Economic Development</b>

**Appendix A Housing Stability Action Plan - Implementation Update, 2019-2024**

<b>Strategic Area of Focus 1: Respond to the Homeless Crisis</b>						
<b>Strategic Initiative</b>	<b>Actions</b>	<b>Metrics</b>	<b>2021</b>	<b>2022</b>	<b>Variance</b>	<b>Comments</b>
<b>1.1 Work collaboratively across systems to address the immediate needs of individuals and families at risk of or experiencing homelessness.</b>	1.1.a. Triage and prioritize people system-wide to support effective and efficient use of system resources.	# of households matched to housing support programs.	372	223	(149)	The metric measure for this action is 600 households, The 3-year total is 1168. There is a downward trend as the capacity in the programs has plateaued and the need for additional support agency resources has not been able to keep pace with demand.
<b>1.1 Work collaboratively across systems to address the immediate needs of individuals and families at risk of or experiencing homelessness.</b>	1.1.b. Develop a coordinated access system that addresses the immediate needs of individuals and families.	# of public consultations and engagements with diverse local communities, including those with lived and/or living experience	2	2	0	The metric measure for this action is 4. The 3-year total of 5.  Coordinated Access continues to develop and present information about Coordinated Access to groups that include service providers (London Homeless Coalition, London Homeless Prevention Network), people with lived experience (London Homeless Coalition), other communities (Built for Zero) and Council.
<b>1.1 Work collaboratively across systems to address the immediate needs of individuals and families at risk of or experiencing homelessness.</b>	1.1.b. Develop a coordinated access system that addresses the immediate needs of individuals and families.	# of programs participating in coordinated access practice	46	47	1	The metric measure for this action is 30. The 3-year total is 47.  The Coordinated Access System works with service providers representing a range of sectors. Coordinated Access continues to increase the number of service providers engaged in the practice through communication and engagement.

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<p><b>1.1 Work collaboratively across systems to address the immediate needs of individuals and families at risk of or experiencing homelessness.</b></p>	<p>1.1.b. Develop a coordinated access system that addresses the immediate needs of individuals and families.</p>	<p>Average time in days between coordinated entry, assessment, referral, and placement</p>	<p>155.72</p>	<p>192.56</p>	<p>36.84</p>	<p>The metric measure for this action is 140 days. It is becoming increasingly more difficult for individuals and families to rapidly secure housing. Contributing factors include vacancy rates and the rising costs of rent.</p> <p>These factors contribute to a longer time between when individuals and families contact Coordinated Access and are housed.</p>
<p><b>1.2 Create an outreach system and rapid response to support individuals and families experiencing unsheltered homelessness.</b></p>	<p>1.2.a. Increase integration with outreach agencies and City service areas.</p>	<p># of agencies and City service areas engaged</p>	<p>23</p>	<p>24</p>	<p>1</p>	<p>The metric measure for this action is 10 formalized partnerships. The 3-year total is 24 formalized partnerships.</p> <p>Continually growing the Coordinated Informed Response partnership table to better serve London through an enterprise-wide approach.</p> <p>Partnerships increased due to the regular support of the Core Area Action Plan.</p>
<p><b>1.2 Create an outreach system and rapid response to support individuals and families experiencing unsheltered homelessness.</b></p>	<p>1.2.b. Engage partners in the Coordinated Informed Response, including those with lived and/or living experience.</p>	<p># of partners engaged</p>	<p>4</p>	<p>9</p>	<p>5</p>	<p>The metric measure for this action is 10. The 3-year total is 9.</p> <p>Continually seeking expertise in the field, based on lived experience supports the Coordinated Informed Response teams to engage with individuals with a compassionate and informed lens.</p> <p>The 2022 Winter Response was supported by 5 additional partners.</p>



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<p><b>1.2 Create an outreach system and rapid response to support individuals and families experiencing unsheltered homelessness.</b></p>	<p>1.2.c. Move the Coordinated Informed Response from a pilot to a permanent program to rapidly house individuals and families experiencing unsheltered homelessness.</p>	<p># of individuals and families housed</p>	<p>258</p>	<p>243</p>	<p>(15)</p>	<p>The metric measure for this action is a 25% increase from year over year.</p> <p>It is becoming increasingly more difficult for individuals and families to rapidly secure housing. Contributing factors include vacancy rates and the rising costs of rent.</p> <p>Coordinated Informed Response continues to support individuals sleeping unsheltered to emergency shelter or housing whenever possible.</p>
<p><b>1.3 Provide the right level of support at the right time to decrease the use of emergency services.</b></p>	<p>1.3.a. Increase system capacity and availability of services across sectors to meet the housing stability needs of individuals and families in crisis.</p>	<p># of support workers in the housing stability system</p>	<p>41</p>	<p>49.5</p>	<p>8.5</p>	<p>The metric measure for this action is 50 FTE Housing Support workers in the system. The 3-year total is 49.5 FTE.</p> <p>Housing Support Workers support individuals and families to secure and maintain housing. Housing Support Programs assist individuals and families to secure and maintain housing. Caseload size is based on the support needs of the household served.</p>
<p><b>1.3 Provide the right level of support at the right time to decrease the use of emergency services.</b></p>	<p>1.3.a. Increase system capacity and availability of services across sectors to meet the housing stability needs of individuals and families in crisis.</p>	<p># of agencies who provide supports</p>	<p>9</p>	<p>8</p>	<p>1</p>	<p>The metric measure for this action is 9. The 3-year total is 8. The City working to maintain its current level of housing support through funded agencies.</p> <p>Agencies providing housing support programs in 2022 include London Cares, Unity Project, Canadian Mental Health Association, St. Leonard's Community Services (Project Home), Youth Opportunities Unlimited, Atlohsa, Street Level Women at Risk and Rotholme.</p>

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						Anova ended their housing support program in 2022.
<b>1.3 Provide the right level of support at the right time to decrease the use of emergency services.</b>	1.3.b. Work with London Police Service and Emergency Medical Services to establish an engagement protocol to support individuals experiencing unsheltered homelessness.	Q3 2020	4	5	1	<p>The metric measure for this action is 1 established protocols. The 3-year total is 5 established protocols.</p> <p>Community-driven and city supported Action and Accountability table was created to focus on unsheltered homelessness.</p> <p>An encampment safety protocol was established through this group in addition to other protocols previously established with LPS, EMS, London Fire Department, LHSC, etc.</p>
<b>1.3 Provide the right level of support at the right time to decrease the use of emergency services.</b>	1.3.c. Increase supports located within other sectors to prevent discharge to shelter or homelessness.	# of housing finder positions supporting health, education, and justice discharge processes	2	1	(1)	<p>The metric measure for this action is 3. The 3 year total is 1 as 2 of the positions roles are currently being provided by the City's Coordinated access team.</p> <p>There is a specialized position supporting youth being discharged to homelessness through the Youth Opportunities Unlimited No Fixed Address program. The Health and Justice sectors are currently being supported by the City's Coordinated Access team.</p>
<b>1.3 Provide the right level of support at the right time to decrease the use of emergency services.</b>	1.3.c. Increase supports located within other sectors to prevent	# of schools participating in homelessness education programs	1	1	0	The metric measure for this action is 10 schools participating. The 3-year total is 2. City teams are working to increase this engagement in year 4 of the plan.

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	discharge to shelter or homelessness.					<p>Housing Stability Services provided guest lectures for social work students at Kings College in 2021.</p> <p>Kings University College School of Social Work participated in the Health and Homelessness Summit in 2022 and has begun planning ways that students can support the Whole of Community Plan.</p>
<b>1.3 Provide the right level of support at the right time to decrease the use of emergency services.</b>	1.3.c. Increase supports located within other sectors to prevent discharge to shelter or homelessness.	# of individuals diverted from being discharged into homelessness	55 of 121 representing 45%	63 of 175 represents a 36% diversion rate.	(9%)	<p>The metric measure for this action is 40% diversion. The 3-year average is 42.3%.</p> <p>Coordinated Access attempts to divert individuals from being discharged from the health and justice sectors.</p> <p>In 2022, 36% (63) of people being discharged to homelessness were successfully diverted which represents a decrease in successful diversions. This may be attributed to fewer options for diverting people to and the rising costs of housing.</p>
<b>1.4 Prevent individuals and families from entering homelessness.</b>	1.4.a. Improve diversion practices to better assist individuals and families to secure housing.	# of individuals and families diverted from homelessness	343 of 873 individuals diverted for a diversion rate of 39.3%	374 of 1155 individuals diverted for a diversion rate of 32.4%	(6.9%)	<p>The metric measure for this action is 25%. The 3-year average is 39%.</p> <p>Coordinated Access attempts to divert new households from an experience of homelessness. This may include family reunification, seeking transitional housing options or continuing to stay where they are with supports.</p> <p>In 2022, households who had a diversion conversation with Coordinated Access were successfully diverted which</p>

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						represents a decrease in successful diversions. This may be attributed to fewer options for diverting people to and the rising costs of housing.
<b>1.4 Prevent individuals and families from entering homelessness.</b>	1.4.a. Improve diversion practices to better assist individuals and families to secure housing.	# of individuals and families rapidly rehoused within 60 days	16.6% or 249	17.3% or 205	(44)	<p>The metric measure for this action is 25%. The 3-year average is 29%.</p> <p>Of all individuals booked into shelter in 2022, 205 were housed within 60 days.</p> <p>The decrease in numbers may be attributed to increased challenges with rapidly securing housing.</p>
<b>1.4 Prevent individuals and families from entering homelessness.</b>	1.4.b. Implement eviction and prevention programs to support individuals and families from entering homelessness.	# of evictions prevented	653	723	70	<p>The 3-year total for evictions prevented is 1376 as there was no year 1 data available and no metric measure identified.</p> <p>The Housing Stability Table works to prevent evictions for households residing in RGI Housing. The program has identified a data error that will be corrected for the 2023 reporting year. The program has reported that 43 evictions were prevented creating a variance of -15 from the previous year.</p> <p>The Housing Stability Bank approved 714 applications for rental arrears loans or grants in 2022.</p>
<b>1.4 Prevent individuals and families from entering homelessness.</b>	1.4.b. Implement eviction and prevention programs to support individuals and families from entering homelessness.	# of households connected to the Housing Stability Table	86	43	(43)	<p>The metric measure for this action is 50 referrals. The 3-year total is 140.</p> <p>In 2022 Housing Stability Table program guidelines were developed and program reporting requirements were expanded.</p>

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						They received 43 referrals in 2022 and report that eviction was prevented in all cases. CMHA reports that staffing challenges contributed to lower outcomes than in 2021.
<b>1.4 Prevent individuals and families from entering homelessness.</b>	1.4.b. Implement eviction and prevention programs to support individuals and families from entering homelessness.	# of individuals and families who remain housed	198	214	16	<p>There were 214 people housed during 2022 who remained housed at the end of 2022. There was no metric measure identified for this action.</p> <p>There were 807 people housed during and prior to 2022 (including those housed prior to 2022) 807 remained housed at the end of 2022.</p>
<b>1.4 Prevent individuals and families from entering homelessness.</b>	1.4.b. Implement eviction and prevention programs to support individuals and families from entering homelessness.	# of individuals and families rapidly rehoused	147	149	2	There were 149 people rapidly housed in 2022 within 60 days of first experiencing homelessness. There was no metric measure identified for this action.
<b>1.4 Prevent individuals and families from entering homelessness.</b>	1.4.c. Establish a mobile diversion and prevention team that supports individuals and families throughout the City.	# of housing finder positions supporting health, education, and justice discharge processes	2	1	1	<p>There is a specialized position supporting youth being discharged to homelessness through the Youth Opportunities Unlimited No Fixed Address program. In the previous year there was also a No Fixed Address program operating through the Canadian Mental Health Association.</p> <p>Housing Finders are integrated across housing support programs. All housing support programs assist individuals on their caseloads involved in the health, education, and justice sectors.</p>

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<p><b>1.4 Prevent individuals and families from entering homelessness.</b></p>	<p>1.4.c. Establish a mobile diversion and prevention team that supports individuals and families throughout the City.</p>	<p># of schools participating in homelessness education programs</p>	<p>1</p>	<p>1</p>	<p>0</p>	<p>Housing Stability Services provided guest lectures for social work students at Kings College in 2021.</p> <p>Kings University College School of Social Work participated in the Health and Homelessness Summit in 2022 and has begun planning ways that students can support health and homelessness in the community.</p>
<p><b>1.4 Prevent individuals and families from entering homelessness.</b></p>	<p>1.4.c. Establish a mobile diversion and prevention team that supports individuals and families throughout the City.</p>	<p># of individuals and families diverted from being discharged into homelessness</p>	<p>55 of 121 representing 45%</p>	<p>63 of 175 represents a 36% diversion rate.</p>	<p>(9%)</p>	<p>Coordinated Access attempts to divert individuals from being discharged from the health and justice sectors.</p> <p>In 2022, 36% (63) of people being discharged to homelessness were successfully diverted which represents a decrease in successful diversions. This may be attributed to fewer options for diverting people to and the rising costs of housing.</p>
<p><b>1.5 House and re-house individuals and families experiencing homelessness rapidly.</b></p>	<p>1.5.a. Implement unique opportunities to support rapid rehousing options.</p>	<p># of opportunities available (e.g. headleases, long-term motel stays, etc.)</p>	<p>18</p>	<p>14</p>	<p>4</p>	<p>The metric measure for this action is 10 units. The 3-year total is 18 units.</p> <p>The pilot Head Lease took place over 2021 – 2022. 18 units were secured in 2021 and 14 of these were still occupied in 2022.</p> <p>In 2022, Council approved a second Head Lease pilot testing the same model operated through a third-party service provider. This pilot will be implemented in 2023.</p>

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<p><b>1.5 House and re-house individuals and families experiencing homelessness rapidly.</b></p>	<p>1.5.a. Implement unique opportunities to support rapid rehousing options.</p>	<p># of individuals and families housed</p>	<p>20</p>	<p>14</p>	<p>6</p>	<p>The metric measure for this action is 10 households housed. The 3-year total was 20 households housed.</p> <p>The pilot Head Lease took place over 2021 – 2022. 20 individuals were housed through this program, and 14 of these were still housed in a head lease unit in 2022.</p> <p>The outcomes for the 20 individuals who participated were:</p> <ul style="list-style-type: none"> <li>• 11 secured permanent housing. <ul style="list-style-type: none"> <li>○ 5 secured permanent housing in the same unit they resided in while participating in the program.</li> <li>○ 6 secured permanent housing unit in another location.</li> </ul> </li> <li>• 5 secured transitional housing.</li> <li>• 2 moved out of the city</li> <li>• 2 returned to homelessness.</li> </ul> <p>In 2022, Council approved a second Head Lease pilot testing the same model operated through a third-party service provider. This pilot will be implemented in 2023.</p>
<p><b>1.5 House and re-house individuals and families experiencing homelessness rapidly.</b></p>	<p>1.5.b. Strengthen the current housing finder role.</p>	<p># of housing finder positions</p>	<p>13</p>	<p>20</p>	<p>7</p>	<p>The metric measure for this action is 10 housing finder positions. The 3-year total is 20 positions.</p> <p>Housing Finders provide individuals and families support to secure housing.</p>

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						<p>Housing Liaisons provide supports for landlords.</p> <p>In 2022, Council approved the expansion of the Housing Identification Program over the next two years. The Housing Identification Program works to build and maintain relationships with landlords.</p>
<b>1.5 House and re-house individuals and families experiencing homelessness rapidly.</b>	1.5.b. Strengthen the current housing finder role.	# of individuals and families housed by housing programs	124	177	53	<p>The metric measure for this action is 300 households housed. The 3-year total is 591.</p> <p>Housing Programs support households to secure and maintain units. In 2022, 177 were housed while supported by a housing support program.</p> <p>Factors that contribute to this increase may include increased program capacity and affordable units (example: 61 units at 122 Baseline).</p>
<b>1.5 House and re-house individuals and families experiencing homelessness rapidly.</b>	1.5.c. Engage landlords to increase rental opportunities for rapid rehousing.	# of landlords engaged	7	7	0	<p>The metric measure for this action is 5 landlords engage. The 3-year total is 7 landlords engaged.</p> <p>Coordinated Access continues to engage landlords for rapid rehousing.</p> <p>In 2022, Coordinated Access engaged with 6 landlords including 4 landlords participating in the pilot head lease program.</p>
<b>1.5 House and re-house individuals and families experiencing homelessness rapidly.</b>	1.5.c. Engage landlords to increase rental opportunities for rapid rehousing.	# of rental opportunities available	16	35	19	<p>The metric measure for this action is 30 units. The 3-year total is 128 units.</p>



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						In 2022, one landlord provided 35 units with supports for matching through Coordinated Access.
<b>1.5 House and re-house individuals and families experiencing homelessness rapidly.</b>	1.5.d. Provide financial supports to assist individuals to secure housing.	# of housing allowances provided	432	387	(45)	<p>The metric measure for this action is 150 allowances per year. The 3-year average is 344 allowances.</p> <p>Housing Allowances pay the difference between the cost of rent and the household ability to pay. Housing Allowances are available to eligible households working with housing support programs.</p> <p>Housing Allowances are separate to the supplements documented in 3.1.b. Housing Allowances are administered through the housing support programs.</p> <p>Housing support programs are seeing an increase in rental rates which impacts the effectiveness of the program.</p>
<b>1.5 House and re-house individuals and families experiencing homelessness rapidly.</b>	1.5.d. Provide financial supports to assist individuals to secure housing.	# of individuals and families assisted through the Housing Stability Bank	1466	2012	546	<p>The metric measure for this action is 1700 households per year. The 3-year average is 1764.</p> <p>The Housing Stability Bank provides eligible low-income Londoners assistance with rental arrears, first/last month rent and utility arrears through loans or grants.</p>
<b>Strategic Area of Focus 2: Create More Housing Stock</b>						
<b>Strategic Initiative</b>	<b>Actions</b>	<b>Metrics</b>	<b>2021</b>	<b>2022</b>	<b>Variance</b>	<b>Comments</b>

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<b>2.1 Retain existing and create new affordable housing stock.</b>	2.1.a. Work with private market to retain existing affordability in rental market units.*	# of policies amended or strategies established (e.g. Condoization, demolition, and short-term rental policies)	0	1	1	Community led initiatives
<b>2.1 Retain existing and create new affordable housing stock.</b>	2.1.b. Develop publicly owned and available lands for affordable housing.	# of surplus municipal lands acquired	0	1	1	Continued effort to acquire surplus municipal lands
<b>2.1 Retain existing and create new affordable housing stock.</b>	2.1.b. Develop publicly owned and available lands for affordable housing.	# of surplus school sites acquired	0	0	0	
<b>2.1 Retain existing and create new affordable housing stock.</b>	2.1.b. Develop publicly owned and available lands for affordable housing.	# of affordable housing and modest market units	551	116	116	Two affordable housing only projects-initiated occupancy granting 116 affordable units
<b>2.1 Retain existing and create new affordable housing stock.</b>	2.1.b. Develop publicly owned and available lands for affordable housing.	# of other publicly owned lands acquired	0	0	0	Continued effort to acquire other publicly owned lands
<b>2.1 Retain existing and create new affordable housing stock.</b>	2.1.c. Implement tools, policies, and programs (the municipal housing toolbox) to create new affordable housing through a Community Improvement Plan (CIP), zoning bylaw update, inclusionary zoning (IZ), bonusing, secondary units, etc.	# of agreements established for affordable housing using municipal policies and permissions	8	13	4	Continued efforts to harness bonusing opportunities

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<p><b>2.1 Retain existing and create new affordable housing stock.</b></p>	<p>2.1.c. Implement tools, policies, and programs (the municipal housing toolbox) to create new affordable housing through a Community Improvement Plan (CIP), zoning bylaw update, inclusionary zoning (IZ), bonusing, secondary units, etc.</p>	<p># of private market units advanced for affordable housing through new municipal tools</p>	<p>94</p>	<p>124</p>	<p>17</p>	<p>Continued efforts to harness bonusing opportunities</p>
<p><b>2.1 Retain existing and create new affordable housing stock.</b></p>	<p>2.1.c. Implement tools, policies, and programs (the municipal housing toolbox) to create new affordable housing through a Community Improvement Plan (CIP), zoning bylaw update, inclusionary zoning (IZ), bonusing, secondary units, etc.</p>	<p># of units supported through the affordable housing CIP</p>	<p>0</p>	<p>0</p>	<p>0</p>	<p>Continued efforts to harness CIP affordable Housing opportunities</p>
<p><b>2.1 Retain existing and create new affordable housing stock.</b></p>	<p>2.1.c. Implement tools, policies, and programs (the municipal housing toolbox) to create new affordable housing through a Community Improvement Plan (CIP), zoning bylaw update, inclusionary zoning (IZ), bonusing, secondary units, etc.</p>	<p># of affordable secondary units created</p>	<p>0</p>	<p>1</p>	<p>1</p>	<p>Secondary Units program is being re-designed in order to grant more affordable secondary units</p>
<p><b>2.1 Retain existing and create new affordable housing stock.</b></p>	<p>2.1.c. Implement tools, policies, and programs (the municipal housing toolbox) to create new</p>	<p># of new affordable housing units advanced through City incentive</p>	<p>0</p>	<p>0</p>	<p>0</p>	<p>In the process of redesigning some of the CIP programs</p>

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	affordable housing through a Community Improvement Plan (CIP), zoning bylaw update, inclusionary zoning (IZ), bonusing, secondary units, etc.	programs and regulations				
<b>2.1 Retain existing and create new affordable housing stock.</b>	2.1.d. Invest in affordable housing through development charges (growth paying for growth) through the creation of a community benefits charge and municipal assessment growth policy.	\$ amount invested through growth charges into affordable housing	0	0	0	Bill 23 makes this initiative not applicable
<b>2.1 Retain existing and create new affordable housing stock.</b>	2.1.e. Explore opportunities to stimulate new affordable housing through government legislation. *	# of new affordable units created	44	116	116	Two affordable housing projects-initiated occupancy granting 116 affordable units
<b>2.2 Revitalize and modernize community housing.</b>	2.2.a. Regenerate London Middlesex Community Housing and other social or community housing sites, maintaining affordability, ensuring long-term stability, and including more housing options. *	# of plans approved for regeneration	0	1	1	Re-imagine regeneration project secured funding sources

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<p><b>2.2 Revitalize and modernize community housing.</b></p>	<p>2.2.a. Regenerate London Middlesex Community Housing and other social or community housing sites, maintaining affordability, ensuring long-term stability, and including more housing options. *</p>	<p># of site plans advanced for regeneration</p>	<p>0</p>	<p>0</p>	<p>0</p>	<p>Re-imagine regeneration project expected to start construction in 2023</p>
<p><b>2.2 Revitalize and modernize community housing.</b></p>	<p>2.2.a. Regenerate London Middlesex Community Housing and other social or community housing sites, maintaining affordability, ensuring long-term stability, and including more housing options. *</p>	<p># of social housing providers engaged in and advancing regeneration plans</p>	<p>0</p>	<p>4</p>	<p>4</p>	<p>Regeneration discussions have started with 4 providers who have identified interest in advancing regeneration plans</p>
<p><b>2.2 Revitalize and modernize community housing.</b></p>	<p>2.2.a. Regenerate London Middlesex Community Housing and other social or community housing sites, maintaining affordability, ensuring long-term stability, and including more housing options. *</p>	<p># of new community housing units developed</p>	<p>0</p>	<p>0</p>	<p>0</p>	<p>Efforts being undertaken</p>
<p><b>2.2 Revitalize and modernize community housing.</b></p>	<p>2.2.a. Regenerate London Middlesex Community Housing and other social or community housing sites, maintaining affordability, ensuring</p>	<p># of affordable housing units created through regeneration</p>	<p>0</p>	<p>0</p>	<p>0</p>	<p>Efforts being undertaken</p>

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	long-term stability, and including more housing options. *					
<b>2.2 Revitalize and modernize community housing.</b>	2.2.a. Regenerate London Middlesex Community Housing and other social or community housing sites, maintaining affordability, ensuring long-term stability, and including more housing options. *	# of official plan and zoning amendments to allow for appropriate intensification of housing regeneration sites	0	1	1	We did not need to make plan amendments, only zone by-law amendment - approve 2022
<b>2.2 Revitalize and modernize community housing.</b>	2.2.b. Leverage funding available from all levels of government to maximize the number and affordability of new community housing units. *	\$ from other sources of funding	\$11.1M	2.5M	10.4	Leveraged provincial OPHI year 4 & HDC contribution as possible
<b>2.2 Revitalize and modernize community housing.</b>	2.2.b. Leverage funding available from all levels of government to maximize the number and affordability of new community housing units. *	% of depth of affordability	69%	72.7%	72.70%	% of depth of affordability below the minimum required of 80%
<b>2.2 Revitalize and modernize community housing.</b>	2.2.c. Support long-term capital planning for social housing providers to address renovation needs	\$ amount allocated to fund capital planning	100% of capital funding allocated	100% of capital funding allocated	0	In 2022, \$2.7M was available and allocated to 13 different community housing providers. Investments included balcony & brick repairs, electrical upgrades, windows & doors, and upgrades to kitchens and bathrooms

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<b>2.2 Revitalize and modernize community housing.</b>	2.2.c. Support long-term capital planning for social housing providers to address renovation needs	# of units supported	403 units supported	611 units supports	208	Ilderton 20, Forest Quarter 62, Inter Faith 64, London Multi-Cultural 55, Gilzean's Creek 40, Tanglewood 72, Windy Woods 90
<b>2.2 Revitalize and modernize community housing.</b>	2.2.c. Support long-term capital planning for social housing providers to address renovation needs	% decrease in the Facility Condition Index	0	0	0	Difficult to assess the annual % decrease in the Facility Condition Index across the social housing provider portfolio
<b>2.2 Revitalize and modernize community housing.</b>	2.2.d. Help housing providers find ways of reducing operating costs through improved energy efficiency. *	# of housing providers engaged	64	64	0	continue to delivery capital program to all housing providers and in 2022 completed multiple info sessions to provide an overview of the capital funding program, building an effective capital plan, how to use various capital planning templates.
<b>2.2 Revitalize and modernize community housing.</b>	2.2.e. Build governance capacity and enhance support to housing provider Boards of Directors. *	# of training sessions	0	3	1	Attended 3 Board meetings to discuss Board Governance and Capital Planning
<b>2.2 Revitalize and modernize community housing.</b>	2.2.e. Build governance capacity and enhance support to housing provider Boards of Directors. *	# of annual meetings held with agency Boards of Directors yearly to support their continued governance	4 meetings	5 meetings	1	5 SHOAC meetings and 11 EOA/EOM discussions intended for Board members strategic planning.

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<p><b>2.2 Revitalize and modernize community housing.</b></p>	<p>2.2.e. Build governance capacity and enhance support to housing provider Boards of Directors. *</p>	<p># of social housing providers maintaining their participation in the social housing system</p>	<p>100%</p>	<p>100%</p>	<p>0</p>	<p>During 2022 London did not have any provider removed from the HSA as a community housing provider. However, with the new HSA rules, providers have the ability to exit the HSA.</p>
<p><b>2.2 Revitalize and modernize community housing.</b></p>	<p>2.2.f. Create the tools to retain affordable rental rates and stability of social housing beyond current operating agreements. *</p>	<p># of units retained post end of mortgage / end of operating agreements</p>	<p>0</p>	<p>100%</p>	<p>1</p>	<p>During 2022 London did not have any provider removed from the HSA as a community housing provider. However, with the new HSA rules as of July 1, 2022, providers have the ability to exit the HSA.</p>
<p><b>2.2 Revitalize and modernize community housing.</b></p>	<p>2.2.f. Create the tools to retain affordable rental rates and stability of social housing beyond current operating agreements. *</p>	<p># of providers retained in the social housing system post end of mortgage / end of operating agreements</p>	<p>0</p>	<p>100%</p>	<p>1</p>	<p>During 2022 London did not have any provider removed from the HSA as a community housing provider. However, with the new HSA rules, providers have the ability to exit the HSA.</p>
<p><b>2.3 Increase supportive and specialized housing options.</b></p>	<p>2.3.a. Develop a supportive and specialized housing model based on unique needs and local priorities.</p>	<p># of strategic partnerships established</p>	<p>3</p>	<p>8</p>	<p>5</p>	<p>Continued effort to develop strategic partnerships</p>
<p><b>2.3 Increase supportive and specialized housing options.</b></p>	<p>2.3.a. Develop a supportive and specialized housing model based on unique needs and local priorities.</p>	<p># of projects advanced</p>	<p>1</p>	<p>2</p>	<p>1</p>	<p>Two projects have been brought to completion after the challenges posed by the COVI19 pandemic</p>



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<b>2.3 Increase supportive and specialized housing options.</b>	2.3.a. Develop a supportive and specialized housing model based on unique needs and local priorities.	# of new supportive and specialized housing units created	44	0	0	Efforts being undertaken
<b>2.3 Increase supportive and specialized housing options.</b>	2.3.b. Work across sectors and systems to create supportive housing solutions for individuals and families at risk of or experiencing homelessness.	# of housing solutions implemented	2	1	1	Starting new age of innovative methods of affordable housing construction
<b>2.4 Attract new and engage current partners towards affordable housing solutions.</b>	2.4.a. Establish a network of sector leaders to develop new models of affordable housing. *	# of sector and/or industry leaders engaged	26	0	26	Efforts being undertaken
<b>2.4 Attract new and engage current partners towards affordable housing solutions.</b>	2.4.b. Combine government programs and funding to create new affordable housing supply. *	# of government programs leveraged	4	4	0	Continued efforts to leverage different levels of government funding
<b>2.4 Attract new and engage current partners towards affordable housing solutions.</b>	2.4.b. Combine government programs and funding to create new affordable housing supply. *	# of developments advanced through stacking funding	9	2	1	Continued efforts to leverage different levels of government funding
<b>2.4 Attract new and engage current partners towards affordable housing solutions.</b>	2.4.c. Use foundations, land trusts, and other means to attract investment and resources into affordable housing.	\$ amount attracted into affordable housing	0	0	0	Efforts being undertaken
<b>2.4 Attract new and engage current partners towards</b>	2.4.c. Use foundations, land trusts, and other	# of land transactions	0	1	0	Efforts being undertaken

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<b>affordable housing solutions.</b>	means to attract investment and resources into affordable housing.					
<b>2.4 Attract new and engage current partners towards affordable housing solutions.</b>	2.4.d. Support the non-profit sector in the creation of new affordable housing. *	# of non-profit housing corporations and co-operatives engaged	8	8	0	Continued efforts to engage different affordable housing actors in the community
<b>2.4 Attract new and engage current partners towards affordable housing solutions.</b>	2.4.d. Support the non-profit sector in the creation of new affordable housing. *	# of new supplement programs		0	0	Continued efforts to engage different new supplement programs in the community

**Strategic Area of Focus 3: Provide Housing Supports**

<b>Strategic Initiative</b>	<b>Actions</b>	<b>Metrics</b>	<b>2021</b>	<b>2022</b>	<b>Variance</b>	<b>Comments</b>
<b>3.1 Help individuals and families access housing stability services and solutions that best meet their needs.</b>	3.1.a. Implement a centralized access system to assist individuals and families to meet their housing stability needs. *	# of tools and resources available to support individuals and families	0	6	6	<p>The metric measure for this action is 1 new tool developed and implemented. The 3-year total is 6.</p> <p>The Coordinated Access System assists individuals and families to meet their housing stability needs by matching to services and supports, including housing support programs and units.</p> <p>Coordinated Access has tools available that include VI-SPDAT assessment, CHAI model (artificial intelligence), Helping Yourself through Hard Times, Food Resource Guide, Mission Services Housing List and the full SPDAT assessment tool.</p>
<b>3.1 Help individuals and families access housing stability services and</b>	3.1.b. Implement a rapid housing program	# of housing supplements provided	531	844	(313)	There is no metric measure identified for this action. The yearly average for supplements is 631.

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<p><b>solutions that best meet their needs.</b></p>	<p>to support local priority populations.</p>					<p>There were 457 housing supplements provided in 2022 under the Community Housing Bridging Program - Municipal Housing (54), Canada Ontario Housing Benefit (369) and Anti-Human Trafficking (34) programs and 387 Housing Allowances administered through housing support programs.</p>
<p><b>3.1 Help individuals and families access housing stability services and solutions that best meet their needs.</b></p>	<p>3.1.c. Implement a person-centered housing stability needs assessment to quickly and effectively serve individuals and families. *</p>	<p>Develop a new housing assessment a readiness tool</p>	<p>0</p>	<p>0</p>	<p>0</p>	<p>The metric measure for this action is 1 needs assessment tool. This review will occur in 2023</p>
<p><b>3.1 Help individuals and families access housing stability services and solutions that best meet their needs.</b></p>	<p>3.1.d. Revise the current locally driven eligibility rules and priority systems for social and affordable housing to better reflect need. *</p>	<p># of local social housing priorities under review, based on need</p>	<p>0</p>	<p>0</p>	<p>0</p>	<p>The metric measure for this action is 1 review of the social housing priorities. This revision will be undertaken in late 2023</p>
<p><b>3.2 Implement coordinated access to mental health and addictions services and supports.</b></p>	<p>3.2.a. Re-engage relevant sectors to assist individuals who present with physical health, mental health, addictions, and trauma.</p>	<p># of agreements established with mental health, physical health, and addictions service providers</p>	<p>0</p>	<p>3</p>	<p>3</p>	<p>There was no metric measure identified for this action.</p> <p>Coordinated Access continues to support programs with institutional discharges which allows for continued connections to the mental health, physical health and addiction service providers,</p>
<p><b>3.2 Implement coordinated access to mental health and addictions services and supports.</b></p>	<p>3.2.a. Re-engage relevant sectors to assist individuals who present with physical</p>	<p># of people diverted from discharge to homelessness</p>	<p>45%</p>	<p>36%</p>	<p>-9%</p>	<p>There was no metric measure identified for this action, but the 3-year average diversion rate is 42.3%.</p>

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	health, mental health, addictions, and trauma.					<p>Coordinated Access attempts to divert individuals from being discharged from the health and justice sectors.</p> <p>In 2022, 36% (63) of people being discharged to homelessness were successfully diverted which represents a decrease in successful diversions. This may be attributed to fewer options for diverting people to and the rising costs of housing.</p>
<b>3.2 Implement coordinated access to mental health and addictions services and supports.</b>	3.2.b. Strengthen partnerships with the health sector to provide opportunities for continuity of care in community.	# of partnerships with the health sector	8	9	1	<p>There was no metric measure identified for this action, but the 3-year total is 9.</p> <p>Partnerships with support providers for continuity of discharge for Londoners who identify with no fixed address in hospital and community medical support. Linking work to provide nursing, OT, PT and ongoing medical support with housing first intake supports completed prior to discharge.</p>
<b>3.2 Implement coordinated access to mental health and addictions services and supports.</b>	3.2.b. Strengthen partnerships with the health sector to provide opportunities for continuity of care in community.	# of providers engaged in the housing with supports model of care	3	4	1	<p>There was no metric measure identified for this action, but the 3-year total is 4.</p> <p>Continued collaborative matching and linking for Mental Health and Addiction supports from the By-Name List prioritized referrals to programs with supportive housing model.</p>
<b>3.3 Support movement and choice within a range of housing options and services based on the needs and interests of individuals and families.</b>	3.3.a. Work with individuals and families to determine their support needs and expand programs that assist them in moving	# of supplements provided	531	844	(313)	<p>The metric measure for this action is 300 supplements per year. The 3-year average for supplements is 671.</p> <p>There were 457 housing supplements provided in 2022 under the Community Housing Bridging Program - Municipal</p>

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	towards their housing goals. *					Housing (54), Canada Ontario Housing Benefit (369) and Anti-Human Trafficking (34) programs and 387 Housing Allowances administered through housing support programs.
<b>3.3 Support movement and choice within a range of housing options and services based on the needs and interests of individuals and families.</b>	3.3.a. Work with individuals and families to determine their support needs and expand programs that assist them in moving towards their housing goals. *	# of agencies who provide supports	13	11	(2)	<p>The metric measure for this action is 9 agencies. The 3-year average is 11 agencies.</p> <p>Agencies support a range of households including individuals and families experiencing chronic homelessness, youth, Indigenous people, Veterans, women involved in sex work, families, etc.</p> <p>In 2022, there were 36 programs offered across 11 agencies.</p>
<b>3.3 Support movement and choice within a range of housing options and services based on the needs and interests of individuals and families.</b>	3.3.a. Work with individuals and families to determine their support needs and expand programs that assist them in moving towards their housing goals. *	# of facilitated housing transitions with a completed assessment	69.9% or 239	54.3% or 159	(80)	<p>The metric measure for this action is 50% of housed individuals have a completed assessment. The 3-year average is 58%.</p> <p>Service Prioritization Decision Assistance Tools (VI-SPDAT and SPDAT) support case management work with households being matched to or participating in housing support programs.</p> <p>In 2022, 54% (159) of individuals had a VI-SPDAT or a full SPDAT completed prior to move-in.</p>
<b>3.3 Support movement and choice within a range of housing options and services based on the needs and interests of individuals and families.</b>	3.3.a. Work with individuals and families to determine their support needs and expand programs that assist them in moving	# of subsidized units	432	387	(45)	There was no metric measure for this action. No data was available for year 1, but the average for the last 2 years is 409 units.

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	towards their housing goals. *					<p>Housing Allowances pay the difference between the cost of rent and the households ability to pay. Housing Allowances are available to eligible households working with housing support programs.</p> <p>Housing Allowances are separate to the supplements documented in 3.1.b. Housing Allowances are administered through the housing support programs.</p> <p>Housing support programs are seeing an increase in rental rates which impacts the effectiveness of the program.</p>
<b>3.3 Support movement and choice within a range of housing options and services based on the needs and interests of individuals and families.</b>	3.3.b. Support housing providers to help tenants reach their community of choice. *	# of policies and practices implemented	1	3	3	<p>The metric measure for this action is 1. The 3-year total is 3.</p> <p>Three Housing Division Notices (HDN) were created in 2022. HDNs fall under the Housing Services Act and are used to communicate to the public and to housing providers the policies and practices of the Service Manager in relation to the RGI/Community Housing System. The three HDNs in 2022 were titled:</p> <ul style="list-style-type: none"> <li>• Revenue and Cost Indices</li> <li>• 2023 Rent Increase Guidelines</li> <li>• Ceasing to Meet Occupancy Standards</li> </ul> <p>New program guidelines were implemented in 2022 for the Housing Stability Table which supports housing providers and tenants in RGI Community Housing with housing stability.</p>

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<p><b>3.3 Support movement and choice within a range of housing options and services based on the needs and interests of individuals and families.</b></p>	<p>3.3.b. Support housing providers to help tenants reach their community of choice. *</p>	<p># of supports available to housing providers</p>	<p>0</p>	<p>4</p>	<p>4</p>	<p>The metric measure for this action is 1. The 3-year total is 4.  Provided HP mental health training, RGI training refresher session and EOA/EOM support sessions.</p>
<p><b>3.3 Support movement and choice within a range of housing options and services based on the needs and interests of individuals and families.</b></p>	<p>3.3.b. Support housing providers to help tenants reach their community of choice. *</p>	<p># of housing providers supported</p>	<p>20</p>	<p>60</p>	<p>40</p>	<p>The metric measure for this action is 80%. The 3-year total is 60%. Work will continue in 2023 on achieving this target.  16 mental health training, 33 HP from RGI training, and 11 EOA/EOM support</p>
<p><b>3.3 Support movement and choice within a range of housing options and services based on the needs and interests of individuals and families.</b></p>	<p>3.3.b. Support housing providers to help tenants reach their community of choice. *</p>	<p># of housing providers offering subsidized units</p>	<p>0</p>	<p>0</p>	<p>0</p>	<p>The metric measure for this action is 15%. Work will continue in 2023 on achieving this target.  Continue efforts to identify opportunities and partnerships.  London-Middlesex has 42 unique housing providers, offering a variety of subsidized housing sizes and types.  WLK Seniors Assistance Association added 2 rent supplement units to the system's rent supplement portfolio.</p>
<p><b>3.4 Strengthen and enhance the delivery of housing stability services.</b></p>	<p>3.4.a. Provide education and supports for landlords and tenants to improve housing stability. *</p>	<p># of tenancy skills courses delivered to the community</p>	<p>0</p>	<p>0</p>	<p>0</p>	<p>The metric measure for this action is 1 course delivered. The 3-year total is 1.  Continued efforts to identify opportunities and partnerships will occur in 2023.</p>

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<p><b>3.4 Strengthen and enhance the delivery of housing stability services.</b></p>	<p>3.4.a. Provide education and supports for landlords and tenants to improve housing stability.</p>	<p># of development opportunities offered to the housing provider community</p>	<p>2</p>	<p>7</p>	<p>5</p>	<p>The metric measure for this action is 2 annually. The 3-year average is 3.6 annually.</p> <p>4 Mental Health + 3 RGI Refresher Training sessions.</p>
<p><b>3.4 Strengthen and enhance the delivery of housing stability services.</b></p>	<p>3.4.b. Develop and implement an eviction prevention strategy to support housing stability. *</p>	<p># of evictions prevented</p>	<p>653</p>	<p>723</p>	<p>70</p>	<p>There is no metric measure for this action.</p> <p>The Housing Stability Table works to prevent evictions for households residing in RGI Housing. The program has identified a data error that will be corrected for the 2023 reporting year. The program has reported that 43 evictions were prevented creating a variance of -15 from the previous year.</p> <p>The Housing Stability Bank approved 714 applications for rental arrears loans or grants in 2022.</p>
<p><b>3.4 Strengthen and enhance the delivery of housing stability services.</b></p>	<p>3.4.c. Implement additional housing stability programs that meet the needs of individuals and families. *</p>	<p># of programs across the housing stability system</p>	<p>0</p>	<p>0</p>	<p>0</p>	<p>The metric measure for this action is 2 new programs annually. The 3-year average is 0.6 per year. Work will continue on achieving this target in 2023.</p> <p>There were not any new programs implemented in 2022.</p>
<p><b>3.4 Strengthen and enhance the delivery of housing stability services.</b></p>	<p>3.4.c. Implement additional housing stability programs that meet the needs of individuals and families. *</p>	<p># of new units made available for rapid rehousing purposes</p>	<p>0</p>	<p>35</p>	<p>35</p>	<p>The metric measure for this action is 50 units. The 3-year total is 185 units.</p> <p>Continued onboarding of units with Private landlords to deliver supportive housing, and affordable housing programs aligned with the roadmap to 3000 units in the City of London</p>



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<p><b>3.4 Strengthen and enhance the delivery of housing stability services.</b></p>	<p>3.4.d. Work with community housing providers to support housing stability.</p>	<p># of new community housing units developed</p>	<p>0</p>	<p>0</p>	<p>0</p>	<p>The metric measure for this action is 50 new units. LMCH is currently in the process of redeveloping their Southdale site to achieve this target.</p>
<p><b>3.4 Strengthen and enhance the delivery of housing stability services.</b></p>	<p>3.4.d. Work with community housing providers to support housing stability.</p>	<p># of women and children supported through the Housing First portfolio in the Violence Against Women sector</p>	<p>74</p>	<p>74</p>	<p>0</p>	<p>The metric measure for this action is 100. The 3-year total is 198.</p> <p>There were 49 women referred through the Violence Against Women sector who received a Canada Ontario Housing Benefit.</p>
<p><b>3.4 Strengthen and enhance the delivery of housing stability services.</b></p>	<p>3.4.e. Invest in and expand Housing First programs into other sectors.</p>	<p># of individuals supported through Housing First in the developmental services sector</p>	<p>0</p>	<p>0</p>	<p>0</p>	<p>There are no metric measures for this action.</p> <p>In 2022, there were not any Housing First programs created in the developmental services sector.</p> <p>Work will continue in support of this action in 2023.</p>
<p><b>3.4 Strengthen and enhance the delivery of housing stability services.</b></p>	<p>3.4.e. Invest in and expand Housing First programs into other sectors.</p>	<p># of youth supported through Housing First in collaboration with the Children’s Aid Society</p>	<p>0</p>	<p>16</p>	<p>16</p>	<p>There are no metric measures for this action. The 3-year total is 16.</p> <p>Coordinated Access Continues to engage with Children's Aid Society with weekly intake support meetings for wrap around supports for prevention and diversion prior to experiences of housing crisis. Designated Access Coordinator supports for intake matching, and case conferencing. Intake support referrals to Housing support workers at Rotholme family shelter if required.</p>

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<p><b>3.4 Strengthen and enhance the delivery of housing stability services.</b></p>	<p>3.4.e. Invest in and expand Housing First programs into other sectors.</p>	<p># of individuals and families being discharged from hospital or jail supported through Housing First in collaboration with the health and justice sectors</p>	<p>0</p>	<p>7</p>	<p>7</p>	<p>There are no metric measures for this action. The 3-year total is 7.</p> <p>Coordinated Access continues to support institutional discharge to no fixed address in Elgin Middlesex Detention Centre, Federal Penitentiary, London Health Science Centre, Parkwood Institute and Urgent Care.</p>
<p><b>3.5 Assist individuals and families to move towards community integration and belonging.</b></p>	<p>3.5.a. Work with landlords to connect residents to supports, services, and resources in their community.</p>	<p># of education activities to connect individuals and families with their community</p>	<p>9</p>	<p>2</p>	<p>(7)</p>	<p>The metric measure for this action is 2 annual events. The 3-year average is 3.6.</p>
<p><b>3.5 Assist individuals and families to move towards community integration and belonging.</b></p>	<p>3.5.b. Work with individuals and families to determine the supports they need to move towards community belonging.</p>	<p># of consultations with individuals and families</p>	<p>0</p>	<p>0</p>	<p>0</p>	<p>There are no metric measures for this action.</p> <p>Consultations planned for 2023</p>
		<p># of individuals and families consulted</p>	<p>0</p>	<p>0</p>	<p>0</p>	<p>There are no metric measures for this action.</p> <p>Consultations planned for 2023</p>
<p><b>3.5 Assist individuals and families to move towards community integration and belonging.</b></p>	<p>3.5.b. Work with individuals and families to determine the supports they need to move towards community belonging.</p>	<p># of practices, services, and programs implemented to meets needs identified</p>	<p>1</p>	<p>1</p>	<p>0</p>	<p>There are no metric measures for this action. The 3-year total is 2.</p> <p>Housing support programs work with individuals and families to move towards community belonging. This includes support to anchor into their homes and community. A transfer practice is in place to provide opportunity for households to move to programs providing a lower level of support as they achieve increased housing stability.</p>

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<p><b>3.5 Assist individuals and families to move towards community integration and belonging.</b></p>	<p>3.5.c. Work to increase income and provide employment opportunities for individuals and families.</p>	<p># of employment related support services made available to individuals and families</p>	<p>0</p>	<p>1</p>	<p>1</p>	<p>There are no metric measures for this action.</p> <p>LPS identified a list of 15 high recidivism individuals for this program. Initiated by LPS, this program collaborated teams from Coordinated Informed Response, Life Stabilization, and outreach. Through this work an additional 10 individuals were identified in the core meeting similar criteria. Through offers of support and engagement, there was a significant decrease of crime in the Core Area.</p>
<p><b>3.5 Assist individuals and families to move towards community integration and belonging.</b></p>	<p>3.5.c. Work to increase income and provide employment opportunities for individuals and families.</p>	<p># of income related support services made available to individuals and families</p>	<p>0</p>	<p>1</p>	<p>1</p>	<p>There are no metric measures for this action.</p> <p>LPS identified high recidivism individuals for this program and through connections to such supports as OW saw a decrease in their crime involvement.</p> <p>LPS initiated program partnering with Coordinated Informed Response, Ontario Works, and outreach.</p>

**Strategic Area of Focus 4: Transform the Service System**

Strategic Initiative	Actions	Metrics	2021	2022	Variance	Comments
<p><b>4.1 Redesign and implement a new housing system to better help individuals and families avoid homelessness and achieve housing stability.</b></p>	<p>4.1.a. Articulate a clear vision for the delivery of housing stability for all. *</p>	<p># of communication materials developed that articulate the housing stability system</p>	<p>22</p>	<p>15</p>	<p>7</p>	<p>There are no metric measures for this action.</p> <p>Municipal Housing (previously Housing Division) and Housing Stability Services (previously Homeless Prevention) brought 15 reports to Council in 2022.</p>

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<p><b>4.1 Redesign and implement a new housing system to better help individuals and families avoid homelessness and achieve housing stability.</b></p>	<p>4.1.b. Create a community-based housing stability leadership working group to help guide the implementation of system change.</p>	<p># of shared services integrated through a single access point</p>	<p>0</p>	<p>1</p>	<p>1</p>	<p>There are no metric measures for this action.</p> <p>Coordinated access Integrated supports provided by Housing access center and Homeless Prevention including front counter, phone and email supports further aligning prevention and diversion supports for new individuals and families experiencing homelessness</p>
<p><b>4.1 Redesign and implement a new housing system to better help individuals and families avoid homelessness and achieve housing stability.</b></p>	<p>4.1.c. Develop shared standards of practice within municipal housing services and homeless prevention and across the housing stability system. *</p>	<p># of shared standards of practice implemented</p>	<p>0</p>	<p>2</p>	<p>2</p>	<p>There are no metric measures for this action.</p> <p>In 2022, Municipal Housing Development completed a mapping exercise.</p> <p>Ontario Works and Coordinated Access completed a core area pilot in 2022. Ontario Works supported clients to have income and identification in place for Coordinated Access.</p>
<p><b>4.1 Redesign and implement a new housing system to better help individuals and families avoid homelessness and achieve housing stability.</b></p>	<p>4.1.d. Align existing priority lists and services within the housing stability system. *</p>	<p># of priority lists aligned (to local priorities)</p>	<p>1</p>	<p>1</p>	<p>0</p>	<p>There are no metric measures for this action.</p> <p>Coordinated Access aligned the By-Name List and Community housing waitlist when matching resources through the housing stability system.</p>
<p><b>4.1 Redesign and implement a new housing system to better help individuals and families avoid homelessness and achieve housing stability.</b></p>	<p>4.1.e. Maximize provincial and federal funding to meet agreement requirements and to enhance housing stability.</p>	<p>provincial and federal funding secured</p>	<p>100%</p>	<p>100%</p>	<p>0</p>	<p>There are no metric measures for this action.</p> <p>Municipal Housing Development and Housing Stability Services did not return any funding to the federal or provincial government.</p>

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<p><b>4.2 Use data to drive decision-making to respond in real-time to the housing stability needs of individuals and families.</b></p>	<p>4.2.a. Develop a data culture to ensure decisions are informed by local intelligence.</p>	<p># of existing databases integrated for service delivery support</p>	<p>3</p>	<p>3</p>	<p>0</p>	<p>There are no metric measures for this action. The 3-year total is 3.</p> <p>The City of London uses Rent Café, Client Relations Management (CRM) and the Homeless Individuals and Families Information System (HIFIS).</p> <p>The Housing Access Centre began using Client Relationship Management software to track new applications in 2022.</p>
<p><b>4.2 Use data to drive decision-making to respond in real-time to the housing stability needs of individuals and families.</b></p>	<p>4.2.b. Investigate evidence-based models and practices and determine their suitability to London.</p>	<p># of evidence-based models and practices implemented</p>	<p>0</p>	<p>5</p>	<p>5</p>	<p>There are no metric measures for this action. The 3-year total is 5.</p> <p>Housing stability service teams continue to apply evidence-based models and practices to their day-to-day work to support Londoners. This includes reviewing, analyzing and revising practices to support real time decision making that supports the housing stability of individuals and families.</p>
<p><b>4.2 Use data to drive decision-making to respond in real-time to the housing stability needs of individuals and families.</b></p>	<p>4.2.c. Evaluate progress and report annually on housing stability efforts and metrics. *</p>	<p># of Housing Stability Action Plan actions completed</p>	<p>71 actions or 60%</p>	<p>82 actions or 69.5%</p>	<p>11 actions or 9%</p>	<p>In 2022 82 actions were completed and 30 in progress.</p>
<p><b>4.2 Use data to drive decision-making to respond in real-time to the housing stability needs of individuals and families.</b></p>	<p>4.2.d. Establish cross-functional teams that monitor changes to the housing market and determine the needs of priority populations. *</p>	<p># of enterprise-wide support services</p>	<p>6</p>	<p>8</p>	<p>2</p>	<p>There are no metric measures for this action.</p> <p>In 2022 there were 8 cross-functional teams including SWOT, MHST, Housing Stability Action Plan, Housing Leadership Team, Coordinated Informed Response and the Core Area Action Team</p>

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<p><b>4.3 Be a local and national leader in housing stability.</b></p>	<p>4.3.a. Ensure municipal council has strong information from committees and community networks and other mechanisms to support housing stability.</p>	<p># of committees and community networks were engaged with providing housing stability related information to Council</p>	<p>7</p>	<p>6</p>	<p>1</p>	<p>There are no metric measures for this action.</p> <p>The following groups provided housing stability related information to Council: SWOT, MHST, Housing Stability Action Plan, Housing Leadership Team, Coordinated Informed Response, Core Area Action Team.</p> <p>In 2022, the SWOT and MHST groups merged to form HEAT.</p>
<p><b>4.3 Be a local and national leader in housing stability.</b></p>	<p>4.3.b. Participate in provincial and national initiatives to solve homelessness.</p>	<p># of provincial initiatives participated in</p>	<p>4</p>	<p>4</p>	<p>0</p>	<p>There are no metric measures for this action.</p> <p>Participation in provincial initiatives included Community Homelessness Prevention Initiative (CHPI) which ended in 2022, Homeless Prevention Program (HPP) which replaced CHPI, ONPA, COVID Emergency Meetings and the London Service Manager Advisory Group</p>
<p><b>4.3 Be a local and national leader in housing stability.</b></p>	<p>4.3.b. Participate in provincial and national initiatives to solve homelessness.</p>	<p># of national initiatives participated in</p>	<p>3</p>	<p>3</p>	<p>0</p>	<p>There are no metric measures for this action.</p> <p>Participation in federal initiatives included Reaching Home, Canadian Alliance to End Homelessness and Built for Zero.</p> <p>Housing Stability Services presented in Built for Zero meetings and webinars throughout 2022 sharing information about London's response to homelessness.</p>
<p><b>4.3 Be a local and national leader in housing stability.</b></p>	<p>4.3.c. Share results through reports, community engagement,</p>	<p># of communication materials developed that articulate the</p>	<p>2</p>	<p>10</p>	<p>8</p>	<p>There are no metric measures for this action.</p>

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	education, and training opportunities*	housing stability system				<p>Coordinated Access created communications in 2022 that included a Council and Public Update about Coordinated Access, and a Booklet for Community Engagement under Built For Zero. Coordinated Access also received Quality CA accreditation 2022 Built for Zero</p> <p>In 2022 the Housing Access Centre began a review of all processes. This review resulted in changes to the way applications are processed. A community webinar was held and posted to the City of London website. An application checklist and reference documents were distributed widely to community and also added to the website.</p> <p>A review of London’s rent supplement system was undertaken with assistance of a consultant,</p> <p>The materials used to communicate information about the Canada Ontario Housing Benefit were reviewed, updated, and distributed to applicants and community partners supporting applicants.</p>
<b>4.3 Be a local and national leader in housing stability.</b>	4.3.d. Engage individuals with lived experience and foster opportunities for peer support in the community. *	# of individuals with lived experience engaged	0	2	2	<p>There are no metric measures for this action.</p> <p>People with lived experience were engaged through participation in the London Homeless Coalition and the Health and Homeless Summit.</p>

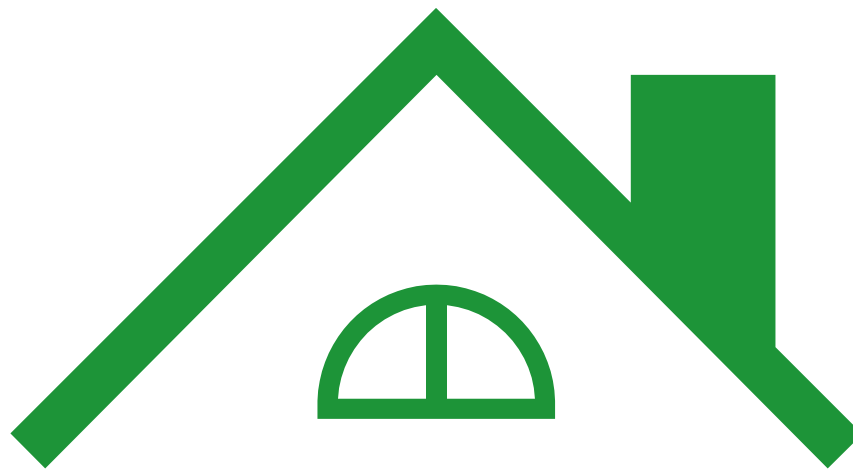
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						Five organizations were contacted to provide a connection to people with lived experience of homelessness, rent supplement and community housing to participate in a review of the rent supplement system. Two people with lived experience were engaged for the Rent Supplement Review.
<b>4.3 Be a local and national leader in housing stability.</b>	4.3.d. Engage individuals with lived experience and foster opportunities for peer support in the community. *	# of opportunities for individuals with lived experience to participate in the system	3	3	0	There are no metric measures for this action.  Individuals with lived experience have opportunities to engage in the system through employment, groups (example: London Homeless Coalition, Health and Homelessness Summit) and through peer engagement opportunities (example: Street Level Women at Risk Women Advisory Group).
<b>4.3 Be a local and national leader in housing stability.</b>	4.3.e. Raise awareness of housing stability initiatives and efforts in the community. *	# of outreach and awareness events held	2	2	0	There are no metric measures for this action.  London Homeless Coalition and online community education sessions





# Homeless Prevention and Housing Plan: 2019 - 2024



CHANGE  
BEGINS WITH  
CHOICE



**2022 Update**

# Middlesex County Housing and Homelessness Plan – Update for 2022

## HOUSING

### Vision

Every Middlesex County resident has opportunity to access the type of housing they need in their community.

### Strategic Priorities

The vision will be achieved by focusing on four strategic priorities in the area of housing. These are:

1. Affordability
2. Range of Housing Options
3. Housing Supports
4. Service Coordination

### Strategic Priority 1: Affordability

- **Social Service Relief Funds (SSRF)**  
The County of Middlesex Social Services worked with external community partners on preparing the business case for operational funding. SSRF funding priorities were to help a diverse range of vulnerable people, create longer-term housing solutions for people in need, and ensure that the housing and homelessness sector has the tools and support that they need to safely and successfully transition to recovery. 35 households were directly supported with SSRF funding in 2022, and a number of community partners were supported as well; CMHA – Thames Valley Addiction and Mental Health Services received funds to provide wrap-around services for those in need of mental health, addiction, and life stabilization supports.
- The County of Middlesex Social Services department has prepared reports and presentations to engage with the local municipalities and inform about the need of affordable housing and the struggles our residents face on a daily basis, principally among them the Affordable Housing Review, which was completed in 2022. The goal of the Review was to better understand the current supply and demand of housing across the County and develop strategies aimed at ensuring a broad array of housing options are available to meet the full spectrum of needs of residents in Middlesex.

## Strategic Priority 2: Range of Housing Options

- The County undertook the Middlesex 2046 Public Engagement related to the update of the County's Official Plan policy document. Housing options and attainability is a major consultation subject area. This work was completed in 2022.
- Several local municipalities within the County undertook similar local planning policy projects and re-examined the provision of alternative housing forms and options.
- The County utilized Provincial funding to undertake an 'Attainable Housing Review, which has been completed. The review examined the housing continuum and identified gaps in the provision of housing and corresponding strategies for attainable housing with an emphasis on the factors that can be locally influenced. The review will help in the future planning of housing and homelessness needs within the County.
- The Municipality of Strathroy-Caradoc, through its Non-Profit Housing Corporation, is poised to develop new affordable housing units. They have begun construction of the affordable apartment building in Mt. Brydges, with expectations of opening in the fall of 2023. Building will have 37 units, and more than half will be designated as affordable at 80% of Market Rent.
- In the Municipality of Middlesex Centre the land has been cleared and real estate signs are up, the building of the innovative development called 'Design for Happiness' is well underway.
- The County has invested in a new real-time market inventory on our Invest in Middlesex site of all residential properties for sale across the County.  
[www.investinmiddlesex.ca/properties/residential](http://www.investinmiddlesex.ca/properties/residential)
- Throughout 2022, local communities such as Middlesex Centre and Lucan Biddulph have been approving several new higher-density housing developments (i.e. apartments in Lucan; townhomes in Kilworth)
- Lower tiers municipalities were encouraged to have Attainable Housing supported through their Community Improvement Plans. Adelaide-Metcalf was supported in their development of their first even CIP in 2022 (it is now the 6<sup>th</sup> municipality in Middlesex County launch as CIP). Their CIP includes an Attainable Housing program as identified as one of its potential incentives. [www.adelaidemetcalf.on.ca/sites/default/files/2023-03/AM%20CIP%20-%20Final%20Community%20Improvement%20Plan.pdf](http://www.adelaidemetcalf.on.ca/sites/default/files/2023-03/AM%20CIP%20-%20Final%20Community%20Improvement%20Plan.pdf)

### **Strategic Priority 3: Housing Supports**

- The community Navigator, who is trained in the Rent Smart program, has been instrumental in supporting residents with applications to housing program, Canada-Ontario Housing Benefits (COHB) and various other supports for housing and general life stabilization. The Community Navigator was able to submit for 66 COHB applications for residents in the County. The approval rate of these applications was 90.9%. 60 applications were successful, and receive an average of \$437.68 per month to increase the affordability of their housing. Of these 60 approvals, 40 applicants were able to use the COHB funding to alleviate their immediate risk of homelessness.
- The County of Middlesex, the Municipality of Thames Centre and regional partners, are active participants in the Middlesex County Connect community transportation system pilot project to provide transportation supports for residents. In early 2023, a proposal will be brought to County Council outlining a plan for future service, which aims to increase ridership of and accessibility to Middlesex County Connect along key corridors.
- County Council and Senior Administration continue to attend delegations with Provincial Ministries and MPPs to highlight the housing and homelessness needs and gaps in the County, identify the significant growth occurring in the County and advocate for additional funding to address the strategic priorities identified in the County of Middlesex Homeless Prevention and Housing Plan.
- The Community Navigator, along with other Community Partners operating in Middlesex County, sent Letters of Advocacy to YOU for additional youth housing in Middlesex County. The result is 2 new youth housing units will be opening up later in 2023, and will be operated by YOU's Next Wave Youth Centre.

### **Strategic Priority 4: Service Coordination**

- The county has ongoing meetings with community agencies and stakeholders to understand the pressure the community is facing when supporting individuals that are unsheltered or at risk of being unsheltered.
- Middlesex Homeless Action Committee (MHAC) – this committee was reformed in 2021, and regular meetings continued in the later half of 2022. The member of the committee are from various sectors; housing supports, police services, Community Navigator, County representative, community agencies and members of the community. This committee was created to advocate for more subsidized and affordable housing, as well as to increase public awareness of the homelessness situation in Middlesex County. MHAC was able to support

local fundraising events regarding homelessness, and have advocated for more services in Middlesex County.

- The County implemented the use of the Homeless Individuals and Family Information System (HIFIS) in 2022. Currently the manager of Social services and the Community Navigator have access to the system. Future collaborations with community partners will be explored in 2023.
- Middlesex County is represented at the Middlesex Situation Table (MST) by the Community Navigator and the Manager of Social Services. MST is a diverse spectrum of service providers that collaborate weekly and mobilize appropriate short-term interventions to address situations of Acutely Elevated Risk (AER). Many of the situations presented involve either homelessness, or risk of homelessness.
- Community Navigator was invited to attend a planning session regarding options for settlement services delivery in London and Middlesex, which was hosted by the London & Middlesex Local Immigration Partnership (LMLIP). The purpose of this session was to discuss possible funding and service models for future settlement programs in Middlesex County.

### **2022 Key Achievements:**

- Successful application and implementation of SSRF Phase 4 and 5.
- The continued success of the Community Navigator
- Advancements in the understanding of the need of housing and supports in the county

# HOMELESS PREVENTION

## Vision

Every Middlesex County resident has opportunity to access the type of housing they need in their community.

## Strategic Priorities

The vision will be achieved by focusing on four strategic priorities in the area of homelessness. These are:

1. Temporary Housing Options
2. Housing Retention
3. Supports
4. Service Coordination

### Strategic Priority 1: Temporary Housing Options

- In 2022, the Provincial Social Services Relief Fund (SSRF) helped support our most vulnerable in the community. The County was able to provide temporary housing supports through two of the local motels in the County. With the Covid-19 Pandemic still in full swing in 2022 the number of visible individuals experiencing homelessness increased. Through work with the Community Navigator and partnership with CMHA TVAMHS the number of individuals and/or families experiencing homeless was mitigated. The Middlesex Transitional Housing Program, supported 102 individuals from 65 families with overnight stays in local motels for an average duration of 1.6 months. Working with other local agencies; WRRC, YOU-Next Wave best practices and supports were shared amongst the group. SSRF funding ended on December 31<sup>st</sup>, 2022.
- The partnership between Middlesex London Paramedic Services (MLPS), and the Middlesex Transitional Housing Program showed there is an increased need in the county. The Middlesex Paramedic Outreach Program was created to support individuals staying at the local motel program. The paramedics were have 41 patient engagements. These included such services as health assessments, medications checks, educational session and referrals to other medical supports in the County.

### Strategic Priority 2: Housing Retention

- The Community Navigator was able to submit for 66 COHB applications for residents in the County. The approval rate of these applications was 90.9%. 60 applications were successful, and receive an average of \$437.68 per month to

increase the affordability of their housing. Of these 60 approvals, 40 applicants were able to use the COHB funding to alleviate their immediate risk of homelessness.

- Through HPP and the SSRF funding allocations the County was able to provide rent, utility cost relief, last months rent, food security programs to many individuals in need.

### **Strategic Priority 3: Supports**

- Through the Middlesex County Social Services and Community Partners network the sharing of information about resources for housing and support for individuals experiencing homelessness has continued to be successful in diverting and supporting people from being homeless. Twenty three unique agencies attend the meetings or are updated via the minutes.
- Since the inception of the community Navigator in September 2020 they have built strong relationships with each community in the County. Providing resources, supports and helping to complete housing related applications.
- The Middlesex County Homelessness Action Committee continued meeting and advocating throughout 2022. The intent of the committee is to advocate and share information about the need for subsidized and affordable housing in the County. Middlesex County Homelessness Action Committee was able to support local fundraising events regarding homelessness by providing open mic information sessions and helped organize FrankFest, which was a community event in support of Coldest Night of the Year 2022.
- Working with the City of London, the County continues to advocate for more funding through the Homeless Prevention Plan. The County's Social Services department applies for any and all funding that is available through provincial, federal and or other sources.

### **Strategic Priority 4: Service Coordination**

- The County continues to use innovative and strategic ideas and initiatives on how best to use funds of the Homeless Prevention Program yearly. The Social Services Department continuously checks in with Ontario Works caseworkers, community partners and individuals they support to ensure the right services and supports are made available.
- The County continues to raise awareness of the increased homeless and at risk of homelessness populations through council reports, presentations and community conversations.
- In 2023 the County will complete a Point in Time count of individuals who identify as homeless or unsheltered. This will be completed collaboratively with the Community Navigator, WRRC, CMHA, YOU-Next Wave and other community

partners. These numbers will help determine what supports are required in the communities.

- The County implemented using the Homeless Individuals and Family Information System (HIFIS) in 2022. Currently the manager of Social services and the Community Navigator have access to the system. Future collaborations with community partners will be explored.
- In 2022, to increase awareness of homelessness in the community, break down the stigma of homelessness, and inspire prosocial action, the Community Navigator conducted a storytelling campaign. Individuals currently experiencing homelessness were asked to share their stories, and these stories (with conditions ensuring anonymity) were made publicly available on the Middlesex Library website at [library.middlesex.ca/community-storytelling](https://library.middlesex.ca/community-storytelling). In addition to the online displays, physical displays of the Storyteller Project were on display at 3 Middlesex County Libraries: Strathroy, Glencoe and Lucan for a month in October-November 2022. Future plans include outdoor displays through Middlesex County on established community trails.

### **2022 Key Achievements:**

- Middlesex Transitional housing program - 102 individuals from 65 families
- 60 county residents were approved for the COHB program
- 41 patient engagements through the Middlesex Paramedic Outreach Program. Health assessments, medication checks, wound care and educational sessions were all completed during this time.



## Report to Community and Protective Services Committee

**To:** Chair and Members, Community and Protective Services Committee  
**From:** Kevin Dickins, Deputy City Manager, Social and Health Development  
**Subject:** 2022-2023 Winter Response Program Outcome Report  
**Date:** May 24, 2023

## Recommendation

That, on the recommendation of the Deputy City Manager, Social and Health Development, the following report “2022-2023 Winter Response Program Outcome Report” **BE RECEIVED** for information purposes.

## Executive Summary

This report provides information on the outcomes and challenges of the 2022-2023 Winter Response Program for Unsheltered Individuals from December 1, 2022 through to March 31, 2023. A final update report will be brought to the standing committee later this year. The supports and services for the 2022-23 winter response were a result of the outcomes from the August 2022 Hunger Strike and subsequent recommendations from the Immediate Action to Support the City’s Most Marginalized Community Action and Accountability Table (Action & Accountability Table) proposal. The proposals included increased basic needs provisions and drop-in spaces for those living unsheltered for the 2022-2023 winter months. Additional operational outcomes and details are identified as attached in Schedule 1.

A number of the services and supports designed and submitted by the Community Action and Accountability Table were approved for periods of up to 4 months to accommodate the winter months with some additional spaces and services to remain open for up to 12 months to assist with addressing the increasing need in community.

The 2022-2023 Winter Response carried a blend of life saving focused programming and housing focused services. The delivery of the winter response was made possible by a number of City funded and non- City funded organizations going above and beyond to create a plan, expand their scope of critical service delivery options, and work to the best of their ability to maximize the use of one-time funding through extended operating hours and staffing capacity building. The funding for this winter response was provided through the remaining one-time and time-limited funding from the Provincial Social Services Relief Funding Phase 5, Reaching Home one-time COVID response funding, a portion of available funding from the remaining previous year’s provincial Homelessness Prevention Program funding, and municipal funding from the Housing Stability Services base budget.

## Linkage to the Corporate Strategic Plan

This report aligns with the strategic areas of focus in the 2023-2027 [City of London Strategic Plan](#).

The City of London is a sustainable city within a thriving region, committed to culture, innovation and providing a safe, affordable, welcoming, and healthy future for today and for the next generation.

### Housing and Homelessness

- The City of London demonstrates leadership and builds partnerships to increase quality, affordable, and supportive housing options.
- London has a robust community system of health, homelessness, housing stability services, policies, procedures and by-laws in place to support individuals and families at risk of or

experiencing homelessness or in precarious housing consistent with Council's recognition of the health and homelessness emergency.

### A Well-Planned and Growing Community

- Develop and enhance planning implementation tools that advance the policies of The London Plan.
- Increase the efficiency and consistency of planning and development processes.
- Direct growth and intensification to strategic locations in a way that maximizes existing assets and resources.
- Protect natural heritage areas and agricultural areas for the needs of Londoners now and into the future.
- Apply the Equity Tool considering the people experiencing mobility poverty, consistent with The London Plan

### Wellbeing and Safety

- London has safe, vibrant, and healthy neighbourhoods and communities.
- London is an affordable and supportive community for individuals and families.
- Londoners have safe access to public spaces, services, and supports that increase wellbeing and quality of life
- Housing in London is affordable and attainable
- Londoners have access to quality, affordable, and timely services
- Londoners have equitable access to key services, community supports, and recreational opportunities that enhance wellbeing and resilience
- Increased access to a range of quality, affordable, and supportive housing options that meet the unique needs of Londoners
- London continues its efforts to promote animal welfare including companion pets and wild animals
- Decreased number of Londoners at risk of or experiencing homelessness
- Improved safety in London's shelters system

### Housing Stability for All: The Housing Stability Action Plan for the City of London (2019-2024)

London's Homeless Prevention and Housing Plan, Housing Stability for All: The Housing Stability Action Plan for the City of London (Housing Stability for All Plan), is the approved guiding document for homeless prevention and housing in the City of London and was developed in consultation with Londoners.

### Links to Community Recovery

The City of London is committed to working in partnership with the community to identify solutions that will drive a strong, deep, and inclusive community recovery for London as we move out of and beyond the global COVID-19 pandemic. This report, and the items within, are linked to supporting Londoners experiencing homelessness during the COVID-19 pandemic to attain and retain permanent housing. This work supports recovery efforts through a coordinated COVID-19 Response that will support the transition of homeless individuals and families.

## **Analysis**

### **1.0 Background Information**

#### **1.1 Previous Reports Related to this Matter**

- 2022-2023 Winter Response and Community Accountability Working Group Funding Reallocation Request (April 12, 2023)
- 2022-2023 Winter Response Program and Action and Accountability Working Group Update (November 29, 2022)

- City of London 2021-2022 Winter Response Program for Unsheltered Individuals (April 12 2022)
- City of London 2020-2021 Winter Response Program for Unsheltered Individuals (November 2, 2021)
- Homeless Prevention COVID-19 Response (SSRF Phase 3) – Single Source Procurement - #SS21-29 (June 22, 2021)
- Municipal Council Approval of The Housing Stability Plan 2019 to 2024 as Required Under the Housing Services Act, 2011 (CPSC: December 3, 2019)

## **2.0 Discussion and Considerations**

### **2.1 Background**

The Winter Response Program was first implemented in 2020 and continued in 2021 as a life saving measure to support Londoners experiencing unsheltered homelessness over the winter months. Services and support provided in conjunction with community partners ensured individuals had a safe place to get warm, rest, have access to basic needs, and connect to housing resources.

Individuals were provided with centrally located daytime drop-in spaces and overnight “Resting Space” drop-in services with access to beverages, snacks, boxed lunches, and meals, as well as access to hygiene services and Amnesty bins for storage of individuals’ personal belongings while accessing the program.

The 2022-2023 Winter Response was a solely community led response as recommended by the Action & Accountability Table. Through this table’s work; London Cares was identified as the lead agency to support the bulk of the services being offered. London Cares as the main Service Provider for this initiative and subcontracted a number of other agencies for additional community and outreach services. Other existing agencies that were directly contracted included the CMHA-Thames Valley Addiction and Mental Health Services London Coffee House program, Atlohsa’s Wiigiwaaminaan Indigenous healing space, Unity Project for relief of homelessness, and the Salvation Army Centre of Hope.

The Action & Accountability Table proposal identified a need for increased basic need supports for those experiencing unsheltered homelessness with a focus on the winter months. Specifically, provision of essentials such as showers, washrooms, laundry and the provision of increased supports for daytime and overnight drop-in space for individual and families experiencing homelessness, along with additional supports for training of agencies and direct service staff.

Elements of the 2022-2023 Winter Response were built on existing resources at the time of the proposal with initial estimates of spaces to be provided for up to 160 day, up to 143 overnight spaces, and up to 56 additional spaces during Middlesex London Health Unit identified cold weather alerts of which there were 4 over this reporting period. As a result of locational and staffing challenges with operationalizing the plan, London Cares, CMHA, Atlohsa and Salvation Army Centre of Hope ended up being contracted to provide up to 155 day spaces, 143 overnight spaces and up to 56 spaces for cold weather alerts.

Continued challenges with finding space and staffing resources resulted in adjustments made for the number of spaces and locations for some of the overnight spaces. This included a shift in location for one of the overnight spaces, as subcontracted by London Cares, to provide three locations of up to 25 beds in each location. Instead, the response ended up being for up to 75 beds in between two locations. Challenges with opening spaces and recruitment and retention of staff played a factor for more than just one organization, resulting in delays finalizing locations and staff onboarding which resulted in an inability to fully provide all approved services from December through to the end of March. One service was only able to open daytime drop in space for the last two weeks of March and have since been able to expand services beyond this reporting period.

A coordinated approach to orientation and training and an overall collaborative approach to ensure unified support through the winter months was applied in accordance with the Action & Accountability Table. Available temporary options included some spaces for couples and for pets, for women and non-binary individuals, and for Indigenous community members.

## 2.2 Program Expectations and Outcomes:

- **Training and Additional Outreach**

- London Cares has been delayed in implementing a coordinated approach to orientation and training and anticipates continuing to implement this training throughout the rest of the year as supported by Whole of Community approach which would ensure unified support of all agencies, including outreach.
- London Cares also supported enhancing and increasing an established outreach program to reach the most marginalized and hard to find individuals living unsheltered.

- **Day Drop-in Space/Shower/Laundry/Washrooms/Basic Needs:**

- London Cares supported the provision of services 12 hours per day, 7 days per week at two locations to offer day services that included:
  - Showers, laundry, washrooms, and basic needs provision, including meals and snacks through 125 rotational drop-in spaces.
- CMHA London Coffee House provided 4 additional service hours per day, 7 days per week. Services included:
  - Laundry, washrooms, basic needs provision through 25 rotational drop-in spaces that served up to 75 people per day.
- London Cares Hub continues to provide services Monday to Friday, 9:30am – 12:30pm and 1:30pm – 4:30pm. Services include:
  - Showers, laundry, washrooms, basic needs provision, connection with housing supports through 25 rotational drop-in spaces for service time period.
- London Cares Resting Spaces operationalized an additional 5 daytime beds plus 2 more beds for cold weather alerts that were provided 7 days per week. Services included:
  - Basic needs provision, showers, washroom access and supports for people with pets.
- London Cares supported the operationalization of day space for women on March 13, 2023 with overnight spaces opening in late April. Services up to March 31 included:
  - Showers, laundry, washrooms, basic needs provision.
- Salvation Army Centre of Hope initially operationalized shower supports 3 days per week and expanded to 5 days per week. (M-F). Services provided include:
  - 2 male and 1 female showers.

Day Spaces provided a warm space for individuals to get in out of the cold, access basic needs, and build a sense of community. It can be difficult to locate individuals when they move locations throughout the day, but these spaces provided a location where housing-focused engagement could take place between individuals and service providers. Agencies were able to work with individuals on paper-readiness, health, and housing, and provide referrals to other supporting social services, health care providers, and shelters. Basic needs provisions included:

- 12,415 cups of coffee and snacks and
- 22,371 meals (lunch and dinner) provided.
- 1,235 showers were provided with over 3,303 loads of laundry.

In addition to the services available at Day Drop-in spaces, the additional Outreach workers provided support and basic needs to those experiencing unsheltered homelessness.

- 936 snack packages, 600 lunches and 6,309 bottles of water
- 165 Hygiene packs, 102 Winter packs, and 9 backpacks
- 2,525 pieces of clothing (coats, gloves, socks, and shoes) and 646 pieces of sleeping materials (pillows, blankets, sleeping mats, tents, and tarps)

The human interaction of any kind was important albeit sometimes difficult to quantify. Organizations had the ability through this winter response to make connections to people, build up trust and relationships, and help individuals get access to medical care, personal care, a variety of treatment options, and improved quality of life and social connection.

- **Night Drop-In Space**

- London Cares operationalized 2 spaces, 7 days per week at two locations to offer overnight services that included up to 70 overnight/drop in spaces.
- London Cares Resting Spaces operationalized an additional 5 overnight beds, 7 days per week, plus 2 additional spaces for cold weather alerts on top of the 10 existing resting space beds provided for a total of 15 resting space beds.
- Salvation Army Centre of Hope operationalized 15 overnight, women only beds, 7 days a week.
- London Cares was unable to operationalize a women's focussed overnight space and only operationalized limited day spaces during this Winter Response reporting timeframe due to location and staffing challenges.
- Unity Project operationalized 8 additional shelter rooms, providing 10 beds for individuals during this reporting period.
- Wiigiwaaminaan Indigenous healing space operationalized 18 spaces for high needs individuals who identify as Indigenous. Due to space constraints, the agency was unable to provide the 10 additional spaces for cold weather alerts.

Overnight Resting Spaces are low barrier spaces for individuals who are sleeping unsheltered to rest, access basic needs and supports, and feel a sense of stability while getting in out of the cold.

### **2.3 Challenges:**

The London community has continued to experience sizable increases in individuals experiencing homelessness since the outset of the pandemic when the number of people on the By-Name List was under 1000 people and now sits just over 2000 individuals at any given time. Challenges also exist when it comes to long term annualized funding to support the increasing demand, the number of organizations available to support this increasing demand, the ability for organizations to scale quickly from a location and staffing perspective to meet this growing demand, and to staff accordingly to support a growing higher acuity and more complex population of vulnerable Londoners. Having places for people to be that are safe, warm, and filled with collaborative supports is something that is being focused on as part of the Whole of Community System Response.

The ability to overcome a number of these challenges and provide an increased level of service speaks to the efforts of the community to come together to support the most marginalized Londoners.

## **3.0 Financial Impact/Considerations**

### **3.1. Funding**

The total amount of approved funding was up to \$5,000,000 through the remaining one-time funding from the Provincial Social Services Relief Funding Phase 5, Reaching Home one-time COVID response funding, any required available funding from remaining provincial Homelessness Prevention Program funding, and municipal funding from the Housing Stability Services base budget. Additional funding and outcome details are provided as attached in Schedule 2.

Funding for this response was available on a one-time basis based on the parameters of the funding sources and the availability of those funds longer term.

## Conclusion

The Winter Response Program for 2022-2023 was created out of community agency discussions and a shared commitment that a more holistic and collaborative service model could be delivered through this different approach. The community in general continues to experience a significant increase in individuals at risk of or experiencing homelessness and demand continues to grow for specialized services. The Winter Response Program did produce many tangible and intangible results that provided several positive interactions and supports for the individuals who accessed the program at a time of year where individuals are at a greater risk due to inclement weather.

As the winter response oversight has shown to date, opportunities for reallocating unspent funds to meet the needs of vulnerable Londoners have been and could continue to be brought forward. The work of the Whole of Community System Response aims to make significant strides in reducing the need to create one-off temporary measures like the winter response in future years through the creation of highly supportive housing units and 24/7 health and homelessness hubs.

**Prepared by:** Debbie Kramers, Manager, Coordinated Informed Response  
**Submitted by:** Craig Cooper, Director, Housing Stability Services  
**Recommended by:** Kevin Dickins, Deputy City Manager, Social and Health Development

## SCHEDULE 1: Operational Results

Service	Expected Result	Actual Result	Variance
Atlohsa Wiigiiwaminaan (2 year shelter) 18 beds	1926 bed nights	1491 bed nights occupied  (77.4% occupancy)	Program was not able to open until December 15 with full staffing not onboarded and trained until January 15.  This resulted in less occupied beds than expected from December 15 through January 15.
Atlohsa Wiigiiwaminaan 10 Cold Alert Beds	40 bed nights	0 bed nights	Location was not able to accommodate additional spaces for cold weather alerts.
CMHA Coffee House 4 month Drop in, 4 hours per day up to 75 spaces	9075 individuals	6546 individuals served	As this was a timed drop in space, the usage is the actual uptake for this service.  Space was contracted to be open 8 hours per day, 7 days per week, but as the space operationalized within budget approval, services are being offered 4 hours per day, 7 days a week. City teams are aware of this discrepancy in service contract and are reviewing the Q1 financials to determine any monetary discrepancies and next steps.
London Cares Additional outreach up to 1 year	Provision of additional basic needs	11,819 service interactions provided	No significant variance as this program met expectations.
Shower Access operationalized by London Cares	12 hours per day, 7 days per week	1082 showers provided	As this was a timed service, the usage is the actual uptake for this service.
Day drop-in services for up to 4 months serving 25 individuals at a time operationalized by London Cares	Provision of Basic needs, meals and clothing	14,771 interactions providing Basic needs, meals and clothing	No significant variance as this program met expectations.
Day drop-in services for up to 4 months serving 50 individuals at a time operationalized by London Cares.	Provision of Basic needs, meals and clothing	22,157 interactions providing Basic needs, meals and clothing	No significant variance as this program met expectations.
40 Overnight spaces for up to 4 months operationalized by London Cares	4620 bed nights	4499 bed nights occupied  (97% occupancy)	No significant variance as this program met expectations.
30 overnight spaces for up to 4 months operationalized by London Cares	2460 bed nights	2411 bed nights occupied  (98% occupancy)	Variance is the provision of 30 beds versus the expected 35 because of location change and staffing challenges. This program met expectations.
25 cold weather alert beds operationalized by London Cares (4 cold weather alerts)	100 bed nights	33 bed nights occupied  (33% occupancy)	Usage of cold weather beds were below anticipated uptake, and any future operationalization of cold weather beds will need to support a system response for increased uptake.
Day drop-in services for up to 1 year	3025 individuals	3597 individuals supported with	Space was contracted to be open 12 hours per day, 7 days per week, but as

<p>serving up to 25 individuals at a time provided by London Cares at 602 Queens Ave.</p>		<p>meals, showers and laundry</p>	<p>the space operationalized, services are being offered 6 hours per day, 5 days a week. City teams are aware of this discrepancy in service and are reviewing the Q1 financials to determine any monetary discrepancies and next steps.</p>
<p>5 additional day resting space beds for up to 1 year provided by London Cares</p>	<p>605 bed days</p>	<p>500 bed days occupied (82.6% occupancy)</p>	<p>Variance was due to a challenge with staff hiring in December and January as well as a number of staff shortages which reduced capacity.</p>
<p>5 additional overnight resting space beds for up to 1 year provided by London Cares</p>	<p>605 bed nights</p>	<p>446 Bed nights occupied (73.7% occupied)</p>	<p>Variance was due to a challenge with staff hiring in December and January as well as a number of staff shortages which reduced capacity.</p>
<p>2 additional resting spaces for cold weather alerts</p>	<p>8 bed days 8 bed nights</p>	<p>13 Beds occupied</p>	<p>No significant variance as this program met expectations.</p>
<p>20 overnight spaces for up to 1 year operationalized by London Cares</p>	<p>0</p>	<p>0</p>	<p>Due to location and staffing challenges, space was not operational during this reporting period.</p>
<p>20 daytime spaces for up to 1 year operationalized by London Cares</p>	<p>350 individuals</p>	<p>313 individuals served.</p>	<p>Due to location and staffing challenges, space was only operational for 2 weeks during this reporting period.</p>
<p>Shower provision for up to 4 months by Salvation Army Centre of Hope located at 281 Wellington Street</p>	<p>Showers provided 3 days a week to start and expanded to 5 days a week.</p>	<p>70 individuals served for showers</p>	<p>As this was a timed service, the usage is the actual uptake for this service.</p>
<p>15 overnight shelter beds for women only for up to 1 year by Salvation Army Centre of Hope located at 281 Wellington Street</p>	<p>1755 bed nights</p>	<p>1755 bed nights occupied (100% occupancy)</p>	<p>No variance as this program met expectations.</p>
<p>8 room, 10 bed shelter increase for up to 4 months by Unity Project located at 636 York St.</p>	<p>968 room nights</p>	<p>948 room nights occupied (98% occupancy)</p>	<p>No significant variance as this program met expectations.</p>
<p>Training</p>	<p>Training for agencies to support system</p>	<p>Training has yet to be implemented</p>	<p>Training expected to be implemented throughout the year and not a concern at this time</p>



**SCHEDULE 2: Financial Results**

Agency	Allocation	Budget	Actuals (Dec 1/22- March 31/23)	Forecast (Apr 1- June 30)	Forecast (July 1- Sept 30)	Forecast (Oct 1- Dec 1)	Surplus/ (Deficit)	Variance
Atlohsa Year 1	700,000	700,000	186,740	171,087	171,087	171,087	0	0.0%
Atlohsa Year 2	610,400	610,400	0	0	0	610,400	0	0.0%
CMHA Coffee House 4-month	68,550	68,550	68,550	0	0	0	0	0.0%
London Cares Training 1 Year	65,175	65,175	0	21,725	21,725	21,725	0	0.0%
London Cares Outreach 1 year	140,100	130,081	29,458	32,741	36,135	29,770	1,977	1.4%
London Cares Showers 4 months	125,900	125,888	111,806	0	0	0	14,081	11.2%
London Cares Dundas Drop-in 4 months	144,230	144,227	93,558	0	0	0	50,669	35.1%
London Cares Richmond Drop in 4 months	315,500	315,497	303,864	0	0	0	11,633	3.7%
London Cares Overnight Space 4 months	804,425	804,425	686,820	0	0	0	117,605	14.6%
London Cares Hub 1 year	312,300	312,289	74,122	84,350	84,350	69,466	1	0.0%
London Cares Resting Spaces 1 year	458,125	458,125	82,695	133,825	133,825	107,776	4	0.0%
London Cares Day & Overnight Spaces 1 year	650,000	545,712	86,456	149,688	171,600	103,955	34,013	5.2%
London Cares Admin	116,420	116,420	30,368	28,684	28,684	28,684	0	0.0%
TSACOH Showers 4 months	52,800	52,800	7,283	17,150	14,300	14,066	0	0.0%
TSACOH Shelter Beds 1 year	345,925	345,925	66,977	94,847	91,847	92,254	0	0.0%
Unity Project	90,150	90,150	90,150	0	0	0	0	0.0%

Shelter Beds 4 Months								
<b>Budget Totals</b>	<b>5,000,000</b>	<b>4,885,664</b>	<b>1,907,107</b>	<b>738,010</b>	<b>757,467</b>	<b>1,253,096</b>		
Budgeted Surplus							229,983	
Unallocated Amount							114,336	
Total Surplus							344,320	
Reallocated							302,000	
Remaining Surplus							<b>42,320</b>	

Variations noted above 10% are a result of location and staff savings.

## Report to Community and Protective Services Committee

**To:** Chair and Members  
Community and Protective Services Committee

**From:** Cheryl Smith, Deputy City Manager, Neighbourhood and Community-Wide Services

**Subject:** SS-2023-151: London Fire Department Single Source Bunker Gear

**Date:** May 24, 2023

## Recommendation

That, on the recommendation of the Deputy City Manager, Neighbourhood and Community-Wide Services, the following actions be taken with respect to the single source procurement of bunker gear:

- a) in accordance with Section 14.4(g) of the Procurement of Goods and Services Policy, Fire Administration **BE AUTHORIZED** to enter into negotiations with Innotex Inc., 275 Rue Gouin, Richmond, Quebec, J0B 2H0, for pricing for a single source contract for one (1) year with one (1) option year for the provision of bunker gear to the London Fire Department;
- b) the approval a) above, **BE CONDITIONAL** upon The Corporation of the City of London negotiating satisfactory prices, terms, conditions, and entering into a contract with Innotex Inc. to provide bunker gear to the London Fire Department;
- c) that Civic Administration **BE AUTHORIZED** to undertake all the administrative acts that are necessary in connection with the authorization set out in parts a) and b) above; and,
- d) that the funding for this procurement **BE APPROVED** as set out in the Source of Financing Report attached hereto as Appendix A.

## Executive Summary

This report requests authorization from Council for the immediate single source purchase of bunker gear using the Canoe Procurement Group of Canada (“Canoe”) to manage the impact of sharp market pricing increases and to ensure that London firefighters have their gear replaced on schedule, as laid out in the Occupational Health and Safety Act.

## Linkage to the Corporate Strategic Plan

The London Fire Department Single Source Bunker Gear Procurement is aligned with the following strategic areas of focus, outcomes and expected results from the City of London Strategic Plan 2023-2027:

**Wellbeing and Safety:** London has safe, vibrant, and healthy neighbourhoods and communities.

- Londoners feel safe across the city, in the core, and in their neighbourhoods and communities
- Improved emergency services response time and reporting

**Well-Run City:** Londoners experience good stewardship, exceptional and valued service.

- London’s finances are maintained in a transparent, sustainable, and well-planned manner, incorporating intergenerational equity, affordability, and environmental, social, and governance considerations

# Analysis

## 1.0 Background Information

### 1.1 Previous Reports Related to this Matter

- [Request for Proposal 15-39 Supply & Delivery of Protective Coats & Trousers \(Bunker Gear\) for Structural Firefighting \(Community and Protective Services October 20, 2015\)](#)

### 1.2 Context

The London Fire Department (“LFD”) follows the Occupational Health and Safety Act [O. Reg. 714/94 \(Firefighters – Protective Equipment\)](#) and the [Section 21 Guidance Note 4-1](#) when outfitting its firefighters. As such, each employee of the LFD who has the potential to be involved in suppression, training, or investigation activities receives two sets of bunker gear. A set of bunker gear includes a coat, trousers, suspenders, and a balaclava. This gear serves as personal protective equipment and is designed to protect the user from heat, dangerous contaminants, and other hazards that LFD personnel face at emergency scenes. By standards, the life cycle of bunker gear is currently ten (10) years.

The LFD has standardized its bunker gear to the Innotex Energy model and had a direct contract in place with the manufacturer, Innotex Inc., since 2015 until its expiry in late 2022. Innotex Inc. no longer offers direct contracts but has a single, subcontracted dealer who provides this gear: AJ Stone Company Ltd. (“AJ Stone”).

## 2.0 Discussion and Considerations

### 2.1 Case for Single Source Procurement via Cooperative Purchasing

When the LFD began its previous bunker gear contract with Innotex Inc., pricing was offered well below market value. Since then, the market price of bunker gear has increased almost five-fold and annual contract increases did not reflect the rapid rise in this cost worldwide. For example, in 2015, the price of one set of gear was approximately \$1,700 (Manufacturer’s Suggested Retail Price - “MSRP”). This same set of gear is priced at \$7,715 (MSRP) today.

The LFD has approximately eight hundred (800) sets of bunker gear in use, and per the Occupational Health and Safety Act, this gear must be replaced every ten (10) years or as it gets decommissioned (if it does not pass biannual testing or is severely damaged). From 2024 to 2025, it is expected that approximately three hundred (300) sets of gear will be required for these replacements, as well as for new recruits. At current market pricing, this cost could be unexpectedly and unsustainably high.

To mitigate the financial impact to the City, the LFD has been working with the City’s Procurement and Supply Division to explore cooperative purchasing, *i.e.*, group buying. Benefits of using a cooperative purchasing program include:

- Cost savings: By pooling resources, a fire department can purchase goods and services at bulk prices;
- Improved purchasing power: Group buying gives a fire department more leverage in negotiations with suppliers, allowing them to secure better prices and terms;
- Streamlined purchasing process: Group buying can simplify the purchasing process, making it more efficient and reducing the workload for administrative staff while still complying with local by-laws, policies, and provincial legislation;
- Standardization: Group buying allows for standardization of equipment and supplies, which can improve operations and reduce costs in the long run; and,
- Improved quality: Group buying can help ensure that the fire department receives high-quality goods and services by leveraging the purchasing power of the group to negotiate better terms.

All offerings through Canoe have undergone a formal competitive bid process on behalf of Ontario's municipalities, ensuring full compliance with purchasing by-laws and trade agreements. Through Canoe, the current contract in place for Innotex gear is valid until August 7, 2024, after which one (1) option year can be negotiated until Canoe repeats the formal competitive bid process.

If this cooperative purchasing opportunity is leveraged, the City of London stands to save money. The standalone LFD contract value of one set of gear would currently be \$4,617; however, the Canoe contract with Innotex Inc. offers pricing at \$3,530 per set. This is reflective of a savings of 24%.

To pursue the advantages of this cooperative purchasing program, the LFD seeks to enter a contract with Innotex Inc. utilizing the single source procurement clause as outlined in section 14.4(g) of the Procurement of Goods and Services Policy below. Therefore, the Deputy City Manager, Neighbourhood and Community-Wide Services, seeks authorization to have this bunker gear procured from a single source.

#### Section 14.4(g) of the Procurement of Goods & Services Policy

##### 14.4 Single Source

Single Source means that there is more than one source of supply in the open market, but only one source is recommended due to predetermined and approved specifications. The procurement may be conducted using a Single Source process if the goods and/or services are available from more than one source, but there are valid and sufficient reasons for selecting one supplier in particular, as follows:

g. It is advantageous to the City to acquire the goods or services from a supplier pursuant to the procurement process conducted by another public body.

## **2.2 Details of Purchase**

Innotex bunker gear is available for immediate purchase from Innotex Inc. via AJ Stone. The estimated price of the required sets of gear, assuming three hundred (300) sets are purchased during the term of this contract, is \$1,059,000 CAD (excluding HST). The current, immediate purchase is for ninety (90) sets of gear at \$3,530 per set for a total of \$317,700 (excluding HST).

## **3.0 Next Steps**

When Canoe goes through its next formal competitive bid process for bunker gear, the LFD plans to continue pursuing the benefits of this method of purchasing. Given the success of negotiating sustainable pricing for gear, cooperative purchasing will be explored for other capital equipment required by the department as it becomes due for lifecycle replacement and contract renewal.

## **4.0 Financial Impact/Considerations**

Per the Source of Financing Report attached as Appendix A, funding for the current purchase of 90 sets of bunker gear is available in the approved capital project FS112323 – Replace Firefighter Equipment. Future purchases can be funded from previously forecasted amounts in this capital project, subject to Council approval in the 2024 - 2027 Multi-Year Budget.

## **Conclusion**

It is recommended that Council authorize the single source procurement of bunker gear as per Section 14.4(g) of the Procurement of Goods and Services Policy, allowing for a resource-saving cooperative purchasing agreement with Innotex Inc. using the Canoe Procurement Group of Canada.

**Prepared by:** Katerina Barton, Manager, Finance and Planning, Fire Services

**Submitted by:** Richard Hayes, Acting Fire Chief

**Recommended by:** Cheryl Smith, Deputy City Manager, Neighbourhood and Community-Wide Services

c: Jason Davies, Manager III, Financial Planning & Policy  
Steve Mollon, Manager, Procurement and Supply, Finance Supports  
Vanetia R, Solicitor I, Legal Services  
Jason Wills, Manager III, Risk Management, Legal Services

**Source of Finance Report**

**Appendix "A"**

#23113  
 May 24, 2023  
 (Contract Award)

Chair and Members  
 Community and Protective Services Committee

RE: London Fire Department Single Source Bunker Gear  
 (Subledger GG230005)  
 Capital Project FS112323 - Replace Firefighter Equipment  
 Innotex Inc. - \$1,059,000.00 (excluding HST)

**Finance Supports Report on the Sources of Financing:**

Finance Supports confirms that the cost of this project can be accommodated within the financing available for it in the Capital Budget and that, subject to the approval of the recommendation of the Deputy City Manager, Neighbourhood and Community-Wide Services, the detailed source of financing is:

<b>Estimated Expenditures</b>	<b>Approved Budget</b>	<b>This Submission (Note 1)</b>	<b>Balance for Future Work</b>
Vehicles and Equipment	713,600	323,292	390,308
<b>Total Expenditures</b>	<b>\$713,600</b>	<b>\$323,292</b>	<b>\$390,308</b>
<b>Sources of Financing</b>			
Drawdown from Fire Facilities, Vehicle and Equipment Renewal Reserve Fund	713,600	323,292	390,308
<b>Total Financing</b>	<b>\$713,600</b>	<b>\$323,292</b>	<b>\$390,308</b>

**Financial Note:**

Contract Price	\$317,700
Add: HST @13%	41,301
Total Contract Price Including Taxes	359,001
Less: HST Rebate	-35,709
Net Contract Price	\$323,292

**Note 1:** The amount included in this submission reflects the purchase of 90 units in 2023. The remaining 210 units purchased in this contract, totalling \$741,300, will be available from previously forecasted amounts in FS1123, subject to future Council approval in the 2024-2027 Multi-Year Budget.



\_\_\_\_\_  
 Jason Davies  
 Manager of Financial Planning & Policy

lp



# LIFE SPIN

LOW-INCOME FAMILY EMPOWERMENT  
SOLE-SUPPORT PARENTS INFORMATION NETWORK

May 15, 2023

Community & Protective Services Committee  
300 Dufferin Avenue  
London ON  
N6A 4L9

Dear Members of the Committee

Founded in 1989, by a group of sole-support parent, LIFE\*SPIN has grown to become one of London's leading champions of those struggling to provide for their families in poverty, with more than 6,000 families assisted each year. LIFE\*SPIN invites the people we serve to take an active part in helping create sustainable supports that help each other to get back on their feet and create hopeful futures for their families.

LIFE\*SPIN has operated a housing initiative in London for 20 years, as a Community Economic Development initiative, utilizing business means to create sustainable benefits to our community. LIFE\*SPIN recognizes that poverty is a result of systemic injustice in our society and works towards a fairer and more equitable structure that may alter the future of many lives, particularly those struggling to survive in poverty.

As we approach the time when you will be considering the next multi-year budget and continue to seek to address the housing crisis in London, we wish to share an overarching concern that has developed over the past year in our city. Whether biases are created by faulty social science or by artificial intelligence, the discrimination that results in designing and funding community responses using biases is the same. Much of the attention on data in the City's collective initiative focuses on the sometimes ominous "shared measurement system." While shared measurement may be an important component of the data activities of the living-rough collective's impact efforts, it is but one aspect of the data landscape and may divert attention from equally important homeless in our community

London has a vast population of homeless individuals and families. There are some that are served by an increasing number of publicly funded shelters and services, and a plethora of uncounted and unrecognized homeless that live in 'private shelter spaces'. The move to only recognize and serve those who utilize publicly funded shelters is amplifying the biases against historically disempowered groups in London. In our community, this means that multi-cultural families and new immigrants that pool their money to rent a decent house, with all their children camped out in living-rooms in sleeping bags or bunks, are not counted and not served. It means that sole-support mothers and off-reserve Indigenous families who reside in derelict

housing are not being counted nor served. So too are those who couch-surf, those who live in single rooms in over-crowded unsafe boarding homes, and those who stay in abusive situations just to keep a roof over their heads.

We have witnessed the creation of a crisis on our streets that is blatantly visible. Numerous agencies and organizations are being funded to provide services to a tenth of the homeless in London. The 'solutions' being designed and funded are not ethically neutral. The coordinated data sharing system in London, that counts the homeless using public shelters does not count those who don't and while we hide the homeless in more public shelter spaces, we also exacerbate the biases and increase the discrimination in funding and resources.

As you know, London has paid consultants to design a few products that have not been implemented yet. An AI system for homelessness is one of those we await. Unfortunately, the design currently replicates the biased system that London has already implemented to serve a few. LIFE\*SPIN serves low income families across the city and we have seen a marked increase in families sharing the rentals of homes and apartments to keep their children under a roof. We have seen a similar increase in numerous family members sharing small apartments, such as a family of six, living in a one-bedroom apartment. These families are homeless; they are living in inadequate private shelters. Parents will do anything to keep their children off the street, however just because they are not sleeping in the doorway of your workplace when you arrive for work, does not mean that they should be discriminated against.

London also has an aging population that is not being recognized in the current allocation of resources. When a spouse passes away, the surviving spouse loses the pension amount that enabled them to lease a one-bedroom unit. A month of potential relief from the rent bank cannot provide housing stability, nor deal with the remaining months of a lease. We also have calls from hospitals when patients are ready to be released, with no home to go home to. Home care supports actually require a home for health care workers to go to. Forgotten and uncounted in the biased system being used in London.

London has taken steps to recognize that homelessness is an issue. The resources and supports are being funnelled to the 'crisis homeless' that use public shelters and/or camp in public spaces, often times to avoid the shelter conditions or requirements. It is really up to you to ensure that the solutions are designed to address the systemic issues, not simply create new or better shelter solutions that help only a few and discriminate against the unseen and exacerbate the critical issue and biases.

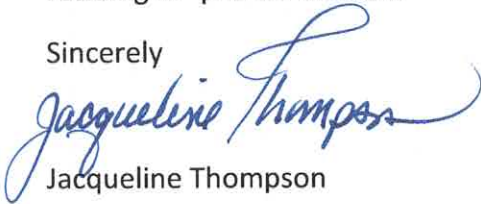
**Affordable Housing:** According to the Canada Mortgage and Housing Corporation (CMHC), housing is considered to be affordable when a household spends less than 30% of its pre-tax income on adequate shelter. Households that spend more than 30% of the income on shelter are deemed to be in "core housing need". Those that spend 50% or more on shelter are in severe housing need. The London Community Foundation released their vital hub last week. Included are the most recent reports of housing in London at

<https://www.bethechangelondon.ca/data-hub-entry/housing-need-and-repairs> that may help you to see the need for more systemic solutions.

To that end, we are enclosing Towards Ethical AI Homelessness Tools, a research paper that was undertaken with a Western University Philosophy Practicum team at LIFE\*SPIN this semester that explores the issues of automating inequality. Please take the time to try to understand the issues inherent in profiling the poor. We can do better and the challenge lays in understanding the systemic issues that create homelessness and finding healthier more holistic solutions that include London's children, seniors and families.

Please do bear in mind that many families in extreme housing need in London will not be represented by shelter and street outreach services. Solutions to the housing crisis in London need to include these unheard voices, increase investments in repairs to existing social housing, strengthen the enforcement of housing standards, and address the housing needs of those residing in "private shelters"

Sincerely



Jacqueline Thompson  
Executive Director



**APRIL 2023**

# **Towards Ethical AI Homelessness Tools**

*A report produced for LIFE\*SPIN by Western  
University Philosophy students*

**PHIL4901G // Honours Capstone Final Project**

**NATHALIE DIBERARDINO  
FIRAS KAYSSI  
LUCAS KOPP  
MARTIN WHITTAKER**

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# Introduction

Artificial Intelligence (AI) is an umbrella term used to describe digital systems that can perform automated ‘intelligent’ tasks (Smuha, 2021). These technologies are increasingly being developed and deployed in our daily lives. They do everything from generating our social media feeds to matching us to our Uber rides, and even sorting through online job applications. They’re also increasingly being used in the public sector, and by public institutions and service agencies, to help them predict and manage the needs of the communities they serve.

One use of AI that is gaining particular attention is that of homelessness management and prediction. AI is being used to collect and categorize data to predict individual risk for homelessness, and to match and triage individuals with appropriate need-based housing support (Eubanks, 2018). These systems are becoming increasingly popular, with one model being used in over 1000 communities across the US, Canada, and Australia (Kithulgodha et al., 2022).

AI technology is what’s behind London’s Chronic Homelessness Artificial Intelligence (CHAI) tool. CHAI’s developers use a public dataset from the Canadian homelessness management information system, and uses AI and machine learning technology to generate predictions about the risk of individuals becoming chronically homeless. The tool makes predictions based on factors like monthly income, age, medical diagnoses, and number of public shelter visits (VanBerlo et al., 2020). Systems like CHAI are designed to identify individuals at risk of homelessness, which, according to London’s manager of homeless prevention Jonathan Rivard, enables the public and private sectors to “provide [those at risk] with more support, and possibly reduce strain on the shelter system” (Lamberink, 2020).

However, the uptake of systems like CHAI comes with serious ethical questions. This report focuses on four such questions: (1) Are the tools informed by an understanding of homelessness that is inclusive enough? (2) Might they be biased against homeless people who are especially marginalized because of factors such as their gender or race—in other words, might the tools exhibit what’s called “algorithmic bias”? (3) Are the tools transparent enough to make their decisions understandable to all stakeholders? (4) How ought public and private institutions handle the collection and storage of homeless clients’ data/personal information?

The report proceeds as follows: *section 1* addresses question 1 above about **understanding homelessness**; *section 2* addresses question 2 about **algorithmic bias**; *section 3* addresses question 3 about **explainable AI**, and *section 4* addresses question 4 about **data privacy** and AI tools.

The goal of this report is to provide a conceptual background and analysis of the current problems around these four topics, which we see as central to the debate around AI's use in the public sector. We focus our examination on London's (CHAI) tool to better understand how these technologies interact with these issues and their potential for causing harm, but our analysis applies more broadly to any homelessness-management tools using machine learning AI technology. This report aims to raise awareness about the issues surrounding these tools amid their increasing popularity, and to serve as an important resource for community service organizations whose work might be impacted by the use of AI in the public sector. Ultimately, this report hopes at least to function as a source of caution for governments and regulatory officials considering using AI tools that threaten to hold such a stake in people's lives.

# Defining Homelessness

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**Firas Kayssi**

*4th Year Philosophy &  
Economics Student*

**Are AI  
Homelessness  
tools informed  
by an  
understanding  
of  
homelessness  
that is inclusive  
enough?**



## 1.1 The Importance of a Definition

Whenever a government, agency, or organization confronts the problem of homelessness, it is important that they first properly define what they mean by ‘homelessness’. Why? Because the definition they use is a description of who gets access to help, and who does not. Therefore, choosing a bad definition might exclude some people who really do need help as a result of homelessness, leading to an unjust and inefficient distribution of resources. The CHAI program was an example of choosing a bad definition for homelessness. Thus, in an effort to better understand the problem, we suggest that a better definition can and should be adopted.

In a paper that documented the development of London’s CHAI tool, they provided their own working definition of homelessness: “London’s Homeless Prevention division identifies an individual as chronically homeless if they have spent 6 or more months (180 days or more) of the last year in a shelter. This definition was adopted from that of chronic homelessness outlined by the federal Canadian government’s homelessness strategy directives” (VanBerlo et al., 2020). Although this description defines ‘chronic’ homelessness, we are concerned with homelessness, in general. The goal of this section is to show how this definition is problematic, and to recommend next steps in light of this.

Put simply, this definition of homelessness used by CHAI is insufficient, in the sense that it does not properly represent the population of people who are homeless. In their paper, “What A Home Does”, David Jenkins and Kimberlee Brownlee distinguish between four standards of living. Within this theory, they provide a distinct and robust definition of the term ‘home’. If the government can endorse this conception of a ‘home’ as defined by Jenkins and Brownlee, instead of the definition they currently use, they can then better identify who to consider ‘homeless’ (Brownlee & Jenkins, 2022). I will describe these four classifications in this section, and we will come to see that the government has only been concerned with one of the four standards of living.

## 1.2 A Good Way to Properly

### Define Homelessness

Brownlee and Jenkins start by distinguishing between two narrow notions of homelessness: *temporary shelter* and *persistent shelter*. The first notion refers to people who have unreliable access to a roof over their heads and a space to fulfill their “primal needs,” such as sleeping and using a bathroom throughout the night. The second notion refers to people with reliable access to the same (Brownlee & Jenkins, 2022).

Their third classification takes a step up from these first two notions of shelter by distinguishing shelter from the notion of *housing*. A *house* has two important characteristics. Firstly, it is a place where our ‘primal needs’ are met, which makes it similar to shelter. Secondly, it is a place over which we have control (Brownlee & Jenkins, 2022). The idea of control can be understood more easily in terms of ‘permission.’ If we need permission to occupy a space, then we cannot say it is our house. This requisite control comes from legal ownership or a rental contract. Thus, being housed, on this understanding, involves having property rights.

Finally, the highest order of classification is the *home*. According to Jenkins and Brownlee, a home has more to do with how we feel and how we are treated by others in a space than what the space looks like, or what is in it. In their own words, a home is “a place of intimate belonging, in which our deepest social needs are met [and it is a] social space in which we are welcome, respected, and accepted” (Brownlee & Jenkins, 2022). If individuals were asked whether they have a space that they can call a home, according to this definition, it would be clear to answer. Further, this conception is much richer because of its ability to convey the feeling of security - something that the government’s current definition does not seem to do well.

It is important to note that, according to Jenkins and Brownlee’s theory, one can (for example) be sheltered and houseless at the same time - or inhabit some other combination of these situations. For example, let us consider a living situation where multiple families live in one housing unit. Only one family might have the right to live in this unit and, therefore, the other family does not have property rights over it. Despite having a space to sleep, having no permission to control that space means they are houseless according to Jenkins & Brownlee’s theory. This shows us how homelessness is more than just what we can see physically.

Therefore, Jenkins and Brownlee’s theory suggests that homelessness is the lack of having a place of intimate belonging, where one feels welcomed, respected, and has their social needs met. In comparison to how the government currently classifies homelessness, Jenkins and Brownlee’s theory also provides the terms ‘shelter’ and ‘house’ to better identify the living standard of an individual. Having more precise terms allows an entity like the government to distinguish between the living situation of different people. This is important, because a poor and unclear definition would end up leaving some people out of the picture, and helping others who might not need it.

Now that we understand Jenkins and Brownlee’s theory, it is clear that London has only been concerned with people who are considered to be temporarily sheltered. Further, it is important to recognize that the government does not appear to be concerned with homeless people, nor the houseless, nor the persistently sheltered. This is not a problem in-and-of-itself, but it can be if they decide to help only the temporarily sheltered and fail to identify them, or even end up identifying the wrong people.

## 1.3 Next Steps

Moving forward, we suggest that the City of London (as well as any other governments, agencies, and organizations that want to tackle the problem of homelessness) incorporate the terms defined by Jenkins and Brownlee into their project. This change will improve a few things. First, it will give them a better arsenal of language to use for future policy making, in the sense that they can better distinguish between one group of people and another. Second, and most relevant for this paper, is the point that governments can better inform their AI technologies with these more precise terms. As we will see in the next section, AI tools are biased, and this bias is informed by how we construct them. Incorporating Jenkins and Brownlee’s theory will essentially minimize the possible damages thereof.

Further, Jenkins and Brownlee's definition of 'home' and 'homelessness' could help destigmatize the problem itself, since this definition allows us to extend our considerations of the problem to more than just visible housing insecurity, like sleeping on the street.

In light of accepting this definition, London might decide that their true focus is elsewhere. For instance, London might recognize that their interest is instead about the temporarily sheltered. Either way, becoming aware of Jenkins & Browlee's theory of homelessness will help them clarify their goal. The important part, and what we hope to show is, that the definition of a targeted demographic matters, and that there are real consequences in doing this improperly - especially when we are in position to inform AI technology about it.

# Algorithmic Bias

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**Nathalie  
DiBerardino**

*4th Year Philosophy  
Student*

**Could AI tools  
biased against  
homeless  
people who are  
especially  
marginalized  
because of  
factors such as  
their gender or  
race?**

## 2.1 Understanding AI

“Algorithmic bias” is an issue that has been the subject of much discussion, both within the media and in academic literature. To understand the problem of algorithmic bias, and how it can impact AI homelessness tools, we first need to get into a little more detail about what AI actually is.

AI tools are made possible through algorithms: abstract sets of steps of tasks for computers to follow. One especially powerful type of algorithm is one that has machine learning (ML) capacities: those which replicate and mimic human thinking, decision making, and problem solving, as they build on their own prior decision-making (Noble 2019). To ‘teach’ an algorithm to make decisions, we input ‘training data’ into them that helps them sort through data in a certain way. Over time, machine learning algorithms become more efficient and accurate at doing this, and can eventually come to generate new predictions and decisions about a given set of data on their own. But, like any other AI tool, CHAI is vulnerable to *bias*.

## 2.2 Algorithmic Bias

AI or algorithmic bias happens when algorithms inherit social patterns that are reflected in their training data—patterns that developers did not intend to include (Johnson, 2020).

Given that we live in a society stratified by race, gender, class, and the like, these social patterns often take the form of discrimination and prejudice towards certain groups. For example, research has uncovered that AI is often biased against women and people of colour (Birhane, 2017). Importantly, algorithmic bias can have serious consequences. Take, for instance, the COMPAS recidivism tool, which was used in the United States to predict the risk of criminal defendants re-offending. The scores generated by the algorithm were used for parole assessments and even given to judges at the time of sentencing (Angwin et al., 2017). However, COMPAS was discovered to be biased against Black defendants: it incorrectly flagged them as future criminals almost twice as much as white defendants (Angwin et al., 2017). This bias then interfered with the freedom and future of people’s lives as it influenced court decision-making.

An AI tool dealing with homelessness would be no different. In predicting individual risk for homelessness for the purpose of matching individuals with appropriate and needed housing support, these tools have the power to supply and withhold access to the fundamental goods of shelter, privacy, and ideally a home. There is thus an urgent need to investigate the possibility of bias in these systems; we need to make sure that resources are allocated to the right people, and for the right reasons.

## 2.3 Bias in homelessness AI tools

There is evidence that homelessness AI tools are biased against women, and especially women of colour. One reason for this might be that when female victims of domestic abuse—a leading cause of homelessness in women—seek public support and housing, they are often categorized and counted as “women who are victims of domestic violence”, rather than as “homeless” (Bretherton, 2017, p.3).

There is also evidence that women, and particularly Black women, under-report their own experiences of criteria for homelessness services in self-assessment surveys, especially on questions on stigmatized topics like mental health history (Kithulgoda et al., 2022). This can prevent them from being triaged and matched with the support that they, in reality, did qualify for.

But perhaps the most serious evidence of AI bias has to do with homelessness *definitions*. As we learned in the previous section, CHAI developers follow the City of London in understanding chronic homelessness as over 180 shelter visits over 365 days (VanBerlo et al., 2020). However, evidence suggests that homeless women are less likely to live on streets and utilize public shelter systems, and instead tend to make private arrangements to couch surf, or temporarily reside with friends or acquaintances (Bretherton, 2017; Oudshoorn et al., 2021). If our working definition of homelessness in AI homelessness tools is one that only considers public shelter stays, and homeless women tend *not* to stay in public shelters, then women will be underrepresented or even absent in the datasets these tools rely on.

The result is that when these tools are used to algorithmically match and triage individuals who qualify as ‘chronically homeless’ with housing support, women can be *systematically excluded from these opportunities*. This comes with enormous consequences for these women’s wellbeing and livelihoods. If our social biases creep into algorithmic tools being used to allocate fundamental resources—thanks to narrow definitions that fail to capture the reality of everyone living with housing insecurity—then the use of AI homelessness tools poses a serious risk of harm.

## 2.4 Next Steps

How can we contend with this problem of bias in homelessness AI tools? One obvious solution might be to aim to eliminate any and all algorithmic bias in these tools. Indeed, the goal of ‘de-biasing’ AI has been much discussed in computer science and in corporations adopting AI tools. But a major contribution from the philosophy literature to this problem is that we can’t just ‘de-bias’ AI.

Philosophy professor Gabbrielle Johnson argues that algorithms can never be value-free, or completely objective and free from bias (2022). She argues that the design of algorithms themselves necessarily comes with choices about which values to include in those algorithms, such as accuracy or consistency (Kuhn, 1962). But values are often chosen on the grounds of social, ethical, and political considerations. For example, a corporation might prioritize the values in their AI tool that further their goal of increased political power. This can thereby inject bias into the tool as it works via those chosen values—at the exclusion of others.

Bias can even be imbued into values themselves. Johnson uses the example of clinical testing of the sleep aid Ambien, which prioritized the value of simplicity and thus tested the drug only on a homogenous group of participants: one entirely of men. Why? Because men have historically been seen as the ‘typical’ research subject. The value of simplicity imbuing that social pattern later had disastrous consequences for women taking the recommended dosage, since it was based on metabolisms significantly different from their own (Johnson, 2022, p.13). And since we’ve learned that AI tools necessarily come with decisions about values, they are vulnerable to this issue of chosen values being bias-laden.

Since algorithms can never be value free, they can never be ‘de-biased’. But this isn’t necessarily bad news; algorithms can, and should, include *good values* that influence the decisions we make. If algorithms can’t be value free, then **the task that algorithmic developers must turn to now is making active decisions about *which values* ought to be included and prioritized in their AI tools.** In the case of CHAI, developers need to carefully consider how to design their algorithms to minimize anyone’s exclusion from access to housing support. This might look like prioritizing inclusivity or equity. Or they might work with a framework in their system design that appreciates how individuals can be oppressed or disadvantaged in multiple ways (that is “intersectional”), and that works to recognize—and not exclude—the unique needs people have in virtue of their social identities (Crenshaw, 1989).

It’s wrong to assume that algorithms can free us from these kinds of judgments. When this much is at stake, philosophers stress that we need to take on the role of actively stopping the perpetuation of oppression and discrimination in AI tools that we’re falsely told can be objective or unbiased. Put another way: if value commitments in algorithms are inevitable, then we need to choose the values that will best serve the ends of justice as AI in the public sector becomes an increasingly popular strategy for making decisions.

# Explainable AI (XAI)

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## Lucas Kopp

*4th Year Philosophy &  
Computer Science  
Student*

**Are AI  
Homelessness  
tools  
transparent  
enough to make  
their decisions  
understandable  
to all  
stakeholders?**



## 3.1 What is XAI and why might

### we want it?

One of the problems with advanced AI and machine learning (ML) systems is that their operations are “opaque”, or inaccessible, to humans. These systems, such as CHAI, are often called “black boxes” because it is as though the internal workings of the AI system are hidden within a locked, black box. One solution to the opacity problem that has gained popularity in the past few years is the idea of explainable AI (XAI) (Zerilli, 2022), which is an algorithm that approximates, or simplifies, how an AI generated its output, in order to make it understandable to a human.

A primary goal of XAI is to give enough insight into how the AI “thinks” such that a human is able to decide on their own whether or not they can, or should, rely on the AI system (Turek, 2017). In other words, XAI translates how an AI system processes information into clear explanations, so that we have insights into why the input caused a particular output. This is relevant to tools like CHAI, because it is important that users can understand and rely on the decisions that will impact peoples’ lives, especially when the decision-maker is a non-human black box.

## 3.2 Problems with XAI

Although there is a general consensus about the need for XAI among philosophers, lawyers, machine learning specialists, and regulators, there is very little consensus on what these explanations need to contain (Lipton, 2016). Brent Mittelstadt, Sandra Wachter, and Chris Russell (2019) of the Alan Turing Institute note that the most popular XAI algorithms offer explanations that resemble scientific models, a mathematical or numerical representation of a system, rather than explanations and, as a result, what they provide is only comprehensible, and reliable to technical experts or specialists. Moreover, these scientific models might show *that* certain factors were relevant to the decision, but it does not say *why* the factors were important, which is vital for a good explanation.

Another issue for XAI is that advanced AI decision-makers find incredibly complex relationships between millions of data points that it uses to generate its decision. Peter Lipton, one of the leading philosophers of explanations, notes that, behind every event, is a long list of causes; however, not all of these causes are *explanatory*: that is, vital to understanding why an event occurred (2001). For example, if you are in a car accident, the fact that you were driving in the first place is one of the causes of the accident, but this cause does not explain *how* or *why* the accident happened. To connect this back to XAI, since millions of connections are being made, the factors that are truly explanatory are not always clear. Mittelstadt and colleagues (2019) acknowledge that this is one of the problems with XAI: it is difficult to select which causes actually explain the decision. If XAI needed to explain the car accident example, the explanation might say that the most important cause of the accident was that you were driving, and although it is not wrong - the accident would not have occurred if you were not driving; this does not really capture *why* the accident occurred.

This point, determining which causes you use to explain a decision, is important because the way information is presented in an explanation can alter or manipulate which factors the recipient of the explanation (explainee) perceives as important. For example, if you explain your car accident to your friend, and tell them you were due to get your brakes serviced, that may cause your friend to think the accident was caused by faulty brakes, when in reality you were on your phone and ran a red light, which caused the accident. This is important in XAI, because developers can alter which factors (causes) their XAI algorithm can use in its explanation, so there is a worry that explainers can present explanations that will discourage “explainees from critically questioning or contesting a decision” (Mittelstadt et al, 2019).

### 3.3 Explanations

Peter Lipton argues that the purpose of an explanation is to convey the appropriate causes of an event, such that the explainee understands *why* the event took place (2001). In the case of AI decision-making algorithms, a good explanation will explain which factors caused the AI system to make its particular decision, for example, the primary facts that contributed to why a certain individual was selected to be matched with housing support. For Lipton, a causal, *contrastive* explanation is, in general, the best form of explanation for doing this (2001). Mittelstadt, Wachter, and Russell agree that a contrastive explanation is the most effective way for an explainer to ensure an explainee understands why an event took place. A contrastive explanation explains by informing the explainee why another, different, result did not occur (Mittelstadt et al, 2019). These are valuable because they inform the user, simply and effectively, why the AI system did not give them an expected result, along with the smallest change in the input that would have to occur for the system to have arrived at a different conclusion (Wachter et al, 2017). For example, suppose a bank uses an AI system to approve mortgage loans. If someone does not receive an approval and they demand an explanation of the system, a contrastive explanation would be of the form:

<Applicant> would have been approved for a loan if their annual salary was \$80,000 per year, however <Applicant>'s application was rejected because their annual salary is \$65,000.

This example shows both of the aforementioned benefits: the loan failed because the applicant does not make enough money, and it also vitally informs the applicant that the easiest way to be approved for a mortgage in the future is to increase their salary.

### 3.4 Solutions

Contrastive explanations are needed in XAI to explain to non-experts because, regardless of competency with AI, they offer insight into how the decision was made, how the system values different data points, and gives the explainee important information regarding how to modify their behaviour in order to receive a different decision in the future (Wachter et al, 2017). This idea is highlighted by Virginia Eubanks, in her book *Automating Inequality*, in which she discusses a man named “Uncle” Gary Boatwright in Los Angeles, who is homeless, and his experiences with VI-SPDAT (an AI system that stands for “Vulnerability Index – Service Prioritization Decision Assistance Tool”) that was used to determine his eligibility for housing aid. He filled out the form three separate times with three different agencies and failed to receive aid each time.

He remains unsure why he was ineligible, whether it is his psychiatric record or his police record or some other factor. If he had received a contrastive explanation, he would understand why he did not receive aid.

The other problem: how to determine which causes are explanatory and relevant. One way to help overcome this, presented by Mittelstadt et al (2019), is to make the explanations *communicative*, a solution supported by Wolter Pieters in his work on building trust in AI systems through explanations (Pieters, 2011). This idea is supported by the way humans often explain to one another. When we do not understand why a friend did something, we often ask them questions until they have explained their action to the point that we understand their motivation. More generally, an explanation is communicative when the explainer and explainee can engage in a dialogue, so the explainee can raise some of their concerns and the explainer can justify their decision, through a series of explanations, that address the explainee's concerns.

### 3.5 Analysis of CHAI as an XAI

The Chronic Homelessness Artificial Intelligence (CHAI) tool developed by the City of London implements a neural network (which is a black box) to predict whether or not someone is likely to become chronically homeless in the next six months. Therefore, to make CHAI more transparent, the developers use an XAI algorithm to generate an explanation of any decision produced by CHAI. The particular XAI tool used by the developers is called LIME (Local Interpretable Model-Agnostic Explanations). Essentially, a neural network is too complex to explain as a whole, so LIME locates a small subsection of the neural network that *can* be explained. The idea is that you can get a good sense of how CHAI values various factors based on the small subsection of the network. From this smaller, simpler network, LIME can generate an explanation of CHAI.

The team who developed CHAI did an admirable job tuning LIME to produce the best explanation they possibly could. In testing, they used the explanations to remove any unintended biases (see section 2) and they also removed any features that proved to be uninfluential. Most importantly, they collaborated with “domain experts at Homeless Prevention” to ensure CHAI did not fixate “on bizarre or unrealistic correlations” (VanBerlo et al, 2020: 9).

There are two primary problems with LIME as a tool for XAI. First, because it bases its explanation on a small subsection of the entire algorithm, LIME sometimes gives too much, or too little weight to certain factors because the subsection that was used to generate the explanation did not include information that was reflective of the entire neural network. Consequently, the explanation may not *fully* reflect how CHAI made its decision. The other problem is stability (or consistency). Because it looks at a subsection, not the entire algorithm, it sometimes generates two different explanations based on the same input data. Although LIME is *typically* accurate, and the team that developed CHAI did a good job at minimizing these concerns, both of these problems weaken our ability to rely on CHAI's explanations.

In conclusion, XAI has to explain to many different stakeholders, and it is important that the explanations cater to all of these stakeholders, but especially those who are most directly impacted by the AI decision. Based on the philosophy literature, contrastive and communicative explanations are the best explanations for non-expert stakeholders, such as homeless people, because it will best allow them to understand the decision.

As it stands, even though CHAI offers an explanation, it does not produce the kind of explanation that is necessary for non-expert stakeholders to actually understand CHAI's decisions. LIME provides a good enough explanation for the needs of expert stakeholders; however, LIME simply does not explain to non-experts in a way that conveys genuine understanding of the decision. Looking forward, there are reasons to be optimistic, because AI researchers have begun to recognize some of the problems with XAI, which is the first step towards addressing them. Importantly, if governments want the public to be able to rely on their AI tools, they should support XAI research that will help create explanations that are both communicative and contrastive.

# Data Privacy

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**Is the private  
data/personal  
information of  
homeless clients  
being collected  
and handled  
responsibly?**

## 4.1 Data Privacy and its Importance

The responsible collection and handling of personal data has proven to be a significant concern. Data privacy and the ethics of data collection is serious enough to warrant serious discussion on the topic (Véliz, 2020). Many people who have expressed that they care about privacy reported negative experiences related to breaches in their personal data, and hold a degree of mistrust or skepticism towards institutions in the handling of their data (Brooke & Véliz, 2019). The rise of artificial intelligence tools will likely compound existing privacy concerns. In order to “train” AI tools to perform their tasks, they require large datasets to work with, which can contain substantial amounts of personal data.

Data privacy is a unique and relatively recent kind of privacy in the wake of the information age and the phenomenon of “big data.” The concern over data privacy has roots in common intuitions about privacy, such as its connection to autonomy, identity, and the “right to be let alone.” If an individual generates enough personal data that can be traced back to them, then that data can potentially confer a level of power or influence over that individual to whoever comes into possession of it; the greater the amount of information, the greater the power. For instance, an institution may have enough information about you to make inferences about your character, aptitudes, circumstances, etc., which they can use to make decisions that will affect you. A credit bureau can determine how credit-worthy you are, which can have all sorts of cascading effects (Pasquale, 2016); an insurance company can know how risky you might be to insure (NAIC, 2022; Blake, 2022); and so on.

When thinking about the concept of privacy, it will be beneficial to have a pragmatic, bottom-up conception of privacy, rather than trying to locate some “essence” of privacy. A promising theory of privacy has been developed by Daniel Solove, a professor of law at George Washington University. In his theory, how we view privacy depends on the context in which it is deemed valuable; an invasion of privacy can manifest in unique ways in the context of different social practices (Solove, 2002). “Social practices” can refer to “various activities, customs, norms, and traditions,” which can include writing letters, talking to a therapist, and making certain decisions about yourself, and so on (2002). All these practices admit of a dimension of privacy that is more-or-less unique to them, and integral to their function. When this dimension of privacy is invaded, a practice is disrupted or destroyed.

Data privacy is important for preserving the dimensions of privacy of the social practices that people engage in. By engaging in certain social practices, people generate or leave behind enough data for parties to collect it, and potentially interpret it into identifying information, leaving those individuals vulnerable to privacy invasions. Depending on what sort of party has that data, and what their motivations are, an individual’s privacy can be invaded in different ways, leading to the disruption of one or more social practices. With the increasing ability of AI tools to detect patterns and draw inferences, it is important to consider how this technology might increase the potential for privacy violations. As organizations assemble massive datasets to train AI algorithms, it is imperative that they adopt responsible policies on the collection, handling, and storage of data.

## 4.2 Data Privacy and the homeless

It is exceedingly rare that the homeless are mentioned in discussions of privacy. The homeless have no private property of their own to retreat to, and thus are forced to occupy public space indefinitely, or temporarily stay in the private space of someone else. The average citizen, being integrated into society, is likely to think that the homeless have nothing to lose in terms of privacy, and thus have no real claim to it. However, homeless individuals still express the same desire for privacy as anyone else, as well as a level of privacy regarding personal information about them (Sparks, 2013). These individuals do not want to be ‘seen as homeless,’ nor would they want—much less deserve—to be haunted by their past in the form of digital records.

Recall earlier what has been said about the CHAI tool. One of the databases used to train the CHAI model is London’s Homeless Individuals and Families Information System (HIFIS), which “joins the service usage information for over a dozen shelters and related homeless services,” and contains “approximately 4 years of 6521 clients’ records” (VanBerlo et al, 2020). The data includes a client’s use of social services, such as number of shelter stays, number of days receiving a housing subsidy, times they were refused service from a shelter, and SPDAT assessment (2020, p. 4). It also includes “total monthly income, total monthly expenses, medical diagnoses, shelters they stayed at, as well as demographic information, such as age, citizenship and gender” (2020). While this is all sensitive information, it is worth mentioning that client anonymity was preserved, “as names and other identifiable information was not fetched by the query,” and clients “were identified by a unique ClientID” (2020, p. 3).

Another tool used by organizations is the Service Prioritization Decision Assistance Tool (SPDAT). As the name suggests, it assists in deciding the priority of homeless clients for receiving homeless prevention services. Using the SPDAT system, a homeless client is asked for a substantial amount of personal information, of which a large portion can be very intimate. This includes a client’s mental and physical health, medication use, substance abuse, experience of abuse and trauma, risk of harm to self and others, legal issues, history of homelessness, and so on (SPDAT manual, 2015, pp. 5-19). Since the purpose of the SPDAT is to determine the priority of assistance for homeless clients, these clients may likely feel compelled to provide as much information as they can, even if it is very intimate, so that they can receive the assistance they need.

The sheer volume and sensitive nature of data collected from homeless clients poses a risk in and of itself. It is important, therefore, to take steps to ensure that data collected from the homeless stays within the context of helping the homeless. Should this data escape that context, a homeless or formerly homeless individual can be made vulnerable to severe privacy violations, potentially impacting their ability to engage in social practices as they establish themselves in society.

## 4.3 Respecting the Data Privacy of the homeless

Given the risks involved in handling the sorts of data collected from the homeless, their data privacy concerns should be taken as seriously as anyone else's. The purpose of these services and algorithms is to assist homeless clients in escaping homelessness and to reintegrate into society; given this, the data privacy of homeless individuals ought to be treated with the same respect as any other citizen. I will propose a list of basic data privacy principles for organizations to keep in mind as they collect and store the personal information of clients:

[1] Ensure that the homeless clients whose data is being collected and analyzed are the main beneficiaries of this collection and analysis; [2] ensure that clients are aware, to the best of their abilities, of your organization's data collection practices, and that their informed consent is obtained; [3] only collect data that is necessary for the purpose of helping the client, or for addressing homelessness in a given population; [4] have a system in place for certain personal or identifying client data to be expunged after a period of time, or upon request; [5] implement, within reason, tools or methods of privacy protection like certain forms of encryption or anonymization; and [6] ensure that client data is only shared within a system of legitimate organizations that provide service to the homeless and will remain in that shared system.

This is a tentative list of general principles that can easily admit of refinement, amendment, or expansion as needed. This list would benefit greatly from expert knowledge in the fields of data management, data privacy, artificial intelligence, and social services related to homelessness. Nonetheless, it is important to have principles like these to inform the data policies of organizations, especially as AI tools become increasingly widespread and sophisticated.



# Conclusion

This report has examined four key issues surrounding the use of AI in the context of homelessness management and prediction: homelessness definitions, algorithmic bias, explainable AI, and data privacy. We have analyzed these issues through the particular case of the City of London’s Chronic Homelessness Artificial Intelligence tool. In our investigation of CHAI, we have contended with, and provided answers to, the following questions:

**(1) Are these tools informed by an understanding of homelessness that is inclusive enough?** We suggest that they are not, and that the theory of homelessness depicted by Jenkins and Brownlee in their paper “What A Home Does” is a better way to understand the problem and its parts. **(2) Might they be biased against homeless people who are especially marginalized?** We have shown that there is serious evidence of bias against women, and especially women of colour in these tools. **(3) Are the tools transparent enough to make their decisions understandable to all stakeholders?** We have shown that XAI fails to provide explanations that allow all stakeholders to understand the AI-decision. **(4) How ought public and private institutions handle the collection and storage of homeless clients’ data/personal information?** Institutions that utilize or plan to utilize AI tools should implement a set of strict principles to guide their data collection practices and prioritize the privacy and security of client data.

In all, we have argued that CHAI and AI tools like it—and the organizations using them—are falling short of adequately responding to these questions. We suggest that more work needs to be done to ensure fairness and equity in each of these dimensions before AI homelessness tools are used in the public sector.

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# Acknowledgements

Thanks to LIFE\*SPIN for their guidance and extremely helpful insights as we completed this project, and to the members of Western's Homelessness Research Team (including Luke Stark, Joanna Redden, and Janet Allen) for their help. Special thanks to Carolyn McLeod, our professor who facilitated the development of this project and was integral to its success.

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