# Emergency Shelter Standards and Operating Requirements - Options

### Recommendation

That Community and Public Services Committee recommend to City Council:

- 1. That the City of Edmonton Minimum Emergency Shelter Standard, as outlined in Attachment 1 of the August 25, 2021, Citizen Services report CS00506, be approved.
- 2. That Administration prepare an education and communications strategy to assist emergency shelter providers move towards adopting the City of Edmonton Minimum Emergency Shelter Standard and return to Committee with an update in 2022.

# **Previous Council/Committee Action**

At the March 15, 2021, City Council meeting, the following motion was passed:

- That Administration look at options to mitigate emergency shelter impacts on communities and provide better service to clients, including the development of minimum emergency shelter standards and operating requirements that can be expected of shelter operators, including orienting service to best support transitions into housing in order to better support clients and communities, and an analysis or options to deal with people who are evicted, or banned from shelters, and provide a report back.
- 2. That the report make recommendations for policy tools and/or municipal bylaw regulatory authorities and the actions the City may take to ensure these standards are met, including but not limited to licensing and conditions and suspensions of licences.

# **Executive Summary**

Through a review of emergency shelter best practices and engagement with stakeholders, Administration has developed the City of Edmonton Minimum Emergency Shelter Standards. The standards aim to increase accessibility and utilization of emergency shelters and better support housing outcomes for individuals experiencing homelessness.

The Minimum Emergency Shelter Standards provide a comprehensive set of outcomes and standards for emergency shelters to adopt to address existing service

gaps in Edmonton's shelter system, including those related to serving Indigenous peoples, individuals with complex health needs, including substance use disorders, and those who sleep outside.

#### Report

According to the By Name List provided by Homeward Trust, there are more than 2,500 individuals currently experiencing homelessness in Edmonton, as of July 2021. Through a review of emergency shelter best practices from other jurisdictions and engagement with a variety of stakeholders, Administration has developed the City of Edmonton Minimum Emergency Shelter Standards (Attachment 1) that aim to increase accessibility and utilization of shelters and better support housing outcomes for individuals experiencing homelessness.

Edmonton's homeless-serving system is made up of a number of supports and programs, including day services, outreach services, medical supports, and a variety of short- to long-term affordable housing types. Within this system, emergency shelters serve as a place of last resort for individuals who have no reasonable alternative housing options; as such, emergency shelters are necessary to meet the immediate needs of shelter guests and connect people to the appropriate services, especially housing, so that their dependence on emergency shelter is rare, brief, and non-recurring.

Existing Regulatory Requirements for Emergency Shelters Emergency shelter services in Edmonton are the responsibility of the Government of Alberta. Various ministries within the Government of Alberta provide funding and regulatory oversight of different types of emergency shelters for different populations, including shelters for youth, families, women, and those fleeing domestic violence.

The Minimum Emergency Shelter Standards and the research completed to develop them were specific to emergency shelters that provide free, walk-up overnight shelter services to individuals without requiring a referral from other organizations. These types of emergency shelter spaces are funded and regulated by the provincial government and delivered by community agencies which often supplement operational funding with private donations and grants.

There are currently 644 emergency shelter beds available in Edmonton for adults at both temporary and permanent emergency shelters. Many of the locations listed below are temporary and were established as a response to the COVID-19 pandemic. The Herb Jamieson Centre, a 400-bed shelter for men run by Hope Mission, is currently under construction and anticipated to open in October 2021.

Provider Numb of Be		Shelter Status
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Hope Mission	342	Downtown	Permanent
Hope Mission	400	Herb Jamieson	Permanent (opens fall 2021)
E4C	38	Women's Emergency Accommodation Centre	Permanent
Hope Mission	150	Spectrum	Temporary
Mustard Seed	37	Trinity Lutheran Church	Temporary
Mustard Seed	33	Knox Evangelical Church	Temporary
Mustard Seed	24	Strathcona Baptist Church	Temporary
Mustard Seed	20	Moravian Church	Temporary

Note: Capacity in emergency shelters is impacted by COVID-19 public health guidelines and other operational impacts, so is subject to change. Temporary shelter for those required to isolate due to COVID-19 is not included in this table

All provincially-funded shelters in Alberta are required to adhere to the Homeless Shelter Accommodation Expectations (Attachment 2). Reviews of these expectations are done annually to ensure compliance. In addition, shelters must meet all other applicable legislation, including compliance with health, safety, building and fire codes, bylaws, regulations and legislation. The Homeless Shelter Accommodation Expectations is attached to all shelter grant agreements between the Government of Alberta and shelter operators and were last updated in 2018/19.

The Homeless Shelter Accommodation Expectations defer the majority of operational decisions to individual shelter operators within the bounds of existing legislation and funding agreements. For example:

- The document does not state how many meals a day should be provided by shelter operators but provides direction on safe food handling rules and obtaining the proper permits to provide food through Alberta Health Services.
- Shelter operators are required to ensure that employees receive appropriate training; however, there is no minimal training requirement across the system.
- The information and referral services expectation directs shelters to link clients with appropriate services in a timely manner but does not detail what service referrals are mandatory or how shelter providers should be evaluating the success of their operation.

# Minimum Emergency Shelter Standards

The development of Minimum Emergency Shelter Standards builds on work Administration conducted with Homeward Trust and other stakeholders to investigate and understand the root causes behind an increase in the number of encampments in Edmonton over the past several years. This research, which included first-person interviews and surveys of people with lived experience, routinely identify emergency shelter conditions as a contributing factor to encampments.

Administration developed the Minimum Emergency Shelter Standards based on jurisdictional best-practices research and comprehensive stakeholder engagement to produce a comprehensive document that outlines operational practices to ensure emergency shelters are accessible and housing-focused.

Across Canada, emergency shelters that serve chronically homeless adults are examining their role within the homeless-serving system and how to improve services for their guests. Many emergency shelters originated from community-based organizations, like churches or civil-society groups, who identified a need in their community and volunteered to address it through charitable means. Although many short-term charitable efforts can provide immediate relief to those in need, the charitable model of line-ups, overnight shelter, and soup kitchens is no longer capable of sustainably addressing community needs and the larger goals to end homelessness. This is due to the increased physical, mental, and addictions health needs present in urban homeless populations and, as a result, emergency shelters are evolving and professionalizing their practices to deliver appropriate social and clinical health support.

The Canadian Shelter Transformation Network is a network of homeless shelter leaders and organizations committed to becoming housing focused, co-chaired by the executive director of Calgary's largest emergency shelter, the Calgary Drop-in Centre. Supported by the Canadian Alliance to End Homelessness, this network has curated significant research and produced tool-kits to assist emergency shelters in becoming housing-focused in order to end homelessness. Notably, the Calgary Drop-in Centre is a leader in this work and has transformed to be focused on generating strong housing outcomes. This transformation was led internally and not mandated by the Government of Alberta and had minimal financial impacts to the organization.

In addition to the resources provided by the Canadian Shelter Transformation Network, Administration reviewed shelter standards from other Canadian jurisdictions, including the City of Toronto and BC Housing, to develop the draft content which was then presented to a wide variety of stakeholders for feedback between April and July 2021 (Attachment 3).

Through the engagement process, consistent themes emerged regarding gaps in Edmonton's shelter system, including data-collection and analysis of outcomes, the increasing complexity of needs and corresponding need for housing-focused, low-barrier options, and the ongoing challenges to address concerns from neighbouring communities. Many stakeholders also identified a lack of cultural support services for Indigenous peoples who comprise over 60 percent of all people experiencing homelessness in Edmonton.

Concerns about community disorder around shelter locations were also highlighted by a variety of stakeholders. Representatives from business improvement areas and community leagues identified cleanliness and garbage, drug-use, and line-ups or queuing for individuals to access services as top of mind issues. Most stakeholders identified concerns with encampments being located directly adjacent to emergency shelters and a lack of support for those who are in crisis. One organization noted that shelters have limited tools to support those with complex needs, short of phoning emergency services that limits the ability of emergency shelters to care for clients. Without these supports, enforcement agencies will continue to be the first response to people with complex health needs.

Finally, service providers emphasized that there is no one-size-fits all approach to sheltering. Shelter operations must have appropriate staffing and space to allow for one-on-one goal setting between shelter guests and support workers and the shelter system must become more adaptive to the unique needs of vulnerable groups (including women, those who identify as 2SLGBTQ+ (two-spirit, lesbian, gay, bisexual, transgender, queer/questioning, and plus), Indigenous populations, and those with complex health needs). The majority of shelter operators agreed emergency shelters serving more than 50 individuals in one space will generally struggle to balance meeting these needs with both individual and community safety concerns.

The Minimum Emergency Shelter Standards enhance the existing regulatory framework used by the Government of Alberta. They seek to standardize operations and service delivery across emergency shelters in Edmonton to ensure operators are working together towards collective goals to improve housing and social outcomes for individuals experiencing homelessness. The standards also recognize that there are system responsibilities, especially as it relates to health services and affordable housing, that must be concurrently addressed. The standards contain a set of guiding principles that directly inform the operational, service-delivery, and physical infrastructure best practices with associated outcomes to evaluate the success of adopting these best practices moving forward.

#### The City of Edmonton's Role

The City of Edmonton liaises regularly with emergency shelters in the homeless-serving sector to work towards better outcomes for people experiencing homelessness. However, the City of Edmonton does not provide routine funding for permanent emergency shelter operations and is not currently regulating internal shelter operations.

If approved by City Council, certain parts of the Minimum Emergency Shelter Standards could be regulated through the City's business licencing or permitting processes; however, there are limitations in adopting either of these approaches as outlined in Attachment 4. If City Council wishes to use formal regulatory mechanisms, more engagement would be required to determine exactly what can be included in either option and corresponding resourcing requirements.

The regulatory option that provides Administration with the most direct influence over internal shelter operations is through public funding agreements. However, given the jurisdictional responsibility of funding emergency shelter services rests with the Government of Alberta and in consideration of the City of Edmonton's financial challenges during COVID-19 recovery, this option is not recommended.

Ultimately, the City of Edmonton cannot unilaterally improve service delivery in the shelter system through regulation. Throughout the engagement, stakeholders repeated the critical importance of collaboration and integration with other sector stakeholders, especially on determining expedient pathways to housing from shelter. Emergency shelter operators also articulated that increased resources and support from the Government of Alberta to implement the standards would be critical to success.

In order to increase accessibility and improve housing outcomes for individuals accessing shelter, emergency shelters need to work with both the City of Edmonton and Government of Alberta, other service providers, and health and justice systems to meet the immediate needs of their guests and ultimately move them to safe housing. If City Council approves the Minimum Emergency Shelter Standards, Administration will develop a communications and education strategy to work with partners to determine an implementation plan. This strategy could include:

- advocacy to the provincial government to adopt the standards
- an educational tool-kit for shelter operators to implement operational changes to be in line with the standards
- communication to the public and funders/donors about the standards
- ongoing work within existing systems-planning tables to make changes to the shelter system

#### How to Support Individuals Banned from Shelter

The Government of Alberta has identified that it supports shelter operators in ensuring that shelter is available to those who need it while also maintaining the safety of all users. Currently, there is no shared list between service providers of individuals who are banned from a shelter, nor is there a regulated service restriction or banning policy that shelter operators need to abide by.

Through the engagement process, all stakeholders identified that the challenge of serving individuals with complex behavioural symptoms, significant mental health issues and substance use has intensified throughout the COVID-19 pandemic and the ongoing opioid epidemic. Shelter operators identified that a lack of appropriate

medical supports in emergency shelters poses a significant challenge for staff in keeping all shelter guests safe; specifically, a lack of interaction with the health care system often means shelter staff can be unaware of a guest's pre-existing health condition and/or not equipped with the skills and tools necessary to support them.

This situation can be doubly challenging for police and peace officers when they are called by emergency shelter operators to respond to people in crisis or they transport individuals with complex needs to emergency shelters only to learn they may be banned. Although there are a number of multidisciplinary teams within Edmonton Police Service that are designed to respond to vulnerable individuals or offenders requiring social support, these teams do not primarily interact with those with complex needs who are banned from shelter or living in encampments. Edmonton Police Service's Human-centred Engagement and Liaison Partnership may engage with individuals with complex needs more frequently; however, they face similar challenges as the emergency shelters in assisting community members due to a lack of integrated medical services and available appropriate shelter and housing options.

The George Spady Society was the only emergency shelter option with clinical support for individuals active in their substance use who have both physical and mental health disorders. However, the society ceased providing shelter operations in 2020, replaced by a medical detox program for people seeking drug treatment. When operating, the George Spady Society emergency shelter was consistently fully utilized and at capacity every night and its closure has exacerbated this service gap.

Stakeholders reiterated the need to increase the supply of supportive housing that has integrated medical and social supports on-site as a critical solution to decreasing chronic homelessness in Edmonton. In early 2022, the City of Edmonton will finish construction of at least 210 units of supportive housing in partnership with Homeward Trust, funded by the City of Edmonton, the Government of Alberta, and Government of Canada.

#### **Budget/Financial Implications**

There are no budget or financial implications associated with approving the Minimum Emergency Shelter Standards at this time. Currently, all ongoing work with emergency shelters is being done internally using existing resources.

#### Legal Implications

Regulatory options for emergency shelters are outlined in Attachment 4.

# Public Engagement

Administration engaged a number of key stakeholders via one-on-one presentations on the draft Minimum Emergency Shelter Standards.

# **Corporate Outcomes and Performance Management**

# Corporate Outcome(s): Edmonton is a safe cityOutcome(s)Measure(s)Result(s)Target(s)Edmontonians have safe and<br/>adequate housingNumber of people<br/>experiencing<br/>homelessnessJune 2021: 2,526<br/>June 2020: 1,693<br/>June 2019: 1,219Decrease year over<br/>year

#### **Risk Assessment**

Risk Element	Risk Description	Likelihood	Impact	Risk Score (with current mitigations)	Current Mitigations	Potential Future Mitigations			
If recommendation is approved									
Public Perception	Municipal government is not able to implement significant changes to the shelter system as the responsibilities lies with other regulatory bodies.	2 - Moderate	1 - Minor	2 - Low	City staff will continue to work with the Government of Alberta and other stakeholders to improve Edmonton's shelter system.	City staff will provide updates to Council on progress made towards adopting standards, including limitations as it relates to jurisdictional authority.			
Public Perception	The Minimum Emergency Shelter Standards are approved but are not adopted by emergency shelter operators as the standards are not binding.	2 - Moderate	1 - Minor	2 - Low	City staff will continue to assist emergency shelter operators to move towards adopting the standards through an education and communication strategy.	City staff will provide updates to Council on progress made towards adopting standards, including limitations as it relates to jurisdictional authority.			
If recommendation is not approved									
Public Perception	Municipal government is not responding to feedback from stakeholders about emergency shelter operations.	2 - Moderate	2 - Moderate	4 - Low	City staff have done extensive engagement with stakeholders and are responsive to citizen concerns.	City staff will continue to engage and work with stakeholders about alternative solutions to improving Edmonton's shelter system.			

#### Attachments

- 1. City of Edmonton Minimum Emergency Shelter Standards
- 2. Homeless Shelter Accomodation Expectations
- 3. Minimum Emergency Shelter Standards What We Heard Report
- 4. Regulatory Options for Emergency Shelter Standards

# **Others Reviewing this Report**

- C. Owen, Deputy City Manager, Communications and Engagement
- K. Fallis-Howell, Acting City Solicitor
- S. McCabe, Deputy City Manager, Urban Planning and Economy
- D. Croft, Acting Deputy City Manager, Financial and Corporate Services