

Response from PASS Board of Directors to Consultant Review Report

March 18, 2021

We are pleased to provide our response to a consultant's report (Executive Summary attached below) on a review, undertaken last year, of external impressions of the shelter program and related services of Port Alberni Shelter Society (PASS).

PASS is multi-service agency that has been dedicated to providing essential low-barrier shelter and supportive housing services in Port Alberni for almost 50 years. We are more than a shelter – we provide housing, food, clothing and supports to those experiencing homelessness, or most at risk of losing their housing, in our community.

Our organization serves as a link to help people reconnect with community agencies and supportive services. By offering temporary shelter, food and gateway services, we assist residents in their efforts to become more self-sufficient and help them move towards independence and long-term sustainable housing.

Consultant's review

PASS recognizes that there is room for improvement, and welcomes this review, along with practical recommendations for how we can do better. This consultant's review highlights some important issues that PASS has already addressed, or is in the process of addressing, based on our ongoing collaborative work with BC Housing and our other community partners. It also notes issues that warrant further review, discussion and action.

Before addressing any of the specific issues raised in the report, we would like to provide some general feedback on the consultant's approach and methodology, and its impact on the review.

In our view, the consultant report does not sufficiently acknowledge the impact that COVID-19 and public health/physical distancing measures have had on how PASS has been able to provide service over the past year. The report also omits the broader community context of increasing pressure for shelter and housing Port Alberni, in part due to the closure of sub-standard housing elsewhere in the community.

We also respectfully disagree with the consultant's decision not to obtain the input of current clients for this review. While we respect the reasons for this decision – to protect our clients and their confidentiality – the net outcome is a review that does not include the essential input of a key audience that uses our services and interacts with our staff every day. To that end, we will be exploring options to create opportunities for our clients to provide confidential, anonymous feedback and input on our services in the future.

We would now like to address some of the specifics in the report.

Service Access

We want to begin by making it clear that PASS policies are living documents and have been updated since a major update in September 2019, particularly to address measures around COVID-19. The cover page for the policy still reads September 2019, a clerical oversight on our part. We are pleased to review these policies with BC Housing at any time, to ensure that they are aligned with provincial standards.

With respect to guest policies, it is important to note that the current restrictions in place are a direct result of COVID-19 and the need for physical distancing and cleaning measures, which as you know, are common for shelters and supportive housing in BC during the pandemic. We know it is a difficult time, and that these policies are hard on people. However, we have to weigh that against our duty to protect people – many of who have complex health issues - from COVID-19 infection. Having said that, like everyone else in this pandemic, we're learning as we go, and we may not always get it right, but we're trying to strike a balance. We are open to additional discussion and feedback on how to maintain that balance, and return to a more open environment as soon as possible, as pandemic restrictions are lifted.

In our view, the review's comments regarding overflow capacity at the Community Expansion Shelter (CES) are not an accurate reflection of how the space is currently being used. For example, in the past week, nine out of 12 spaces in the overflow shelter were used each night, and most nights, our shelters are operating at or near 100% capacity.

The review also provided extensive comments regarding mental health supports for community members, including our clients. We agree with the need for expanded mental health support services in Port Alberni, which are more significant than PASS can provide on our own. We would welcome the opportunity for additional mental health training for our staff, and would also welcome collaborating with other community partners, BC Housing and Island Health on increasing mental health services in this community.

The review also commented extensively on our complaints and appeals process. Our policies are clear on the very limited circumstances around which we restrict access into our low-barrier shelter. Staff are instructed and trained to deal with most complaints immediately through conversation and mediation. However, all clients also have the right to forward a complaint to the executive director, board of directors and BC Housing for additional review. We also have an appeal process with an independent committee that reviews peoples' eligibility for return to the PASS shelter, for those who have been denied service in the past.

We are recommitting to improve our efforts to raise awareness about complaints and appeals and how they're addressed, with our clients, community members and community partners. We are also pleased to discuss and review our policies with BC Housing, should adjustments be deemed necessary.

Service Environment

PASS is dedicated to providing a welcoming, safe and secure environment for our clients. As noted earlier, it would have been helpful for the review to obtain input from our current clients in this regard. PASS will continue to work with all of our partners to remove barriers to eliminating homelessness in our community.

About 19% of our regular clients at the PASS shelter are Indigenous. We have Indigenous people on both our board and on our staff, and want to create an environment where everyone feels welcome. We'd be happy to discuss with the Nuu-chah-nulth Tribal Council (NTC) and other Indigenous service providers in the community how to create a more culturally supportive and safe environment for our Indigenous clients.

It is important to note that we have a strong and ongoing relationship with the NTC, and in fact, have an NTC representative on our appeals committee. Unfortunately, the NTC is not able to participate in all the opportunities we – and other community organizations – invite their representatives to join. We welcome advice and collaboration with BC Housing to address this issue, and ensure that the NTC and our other community partners are engaged where they want and need to be in our work.

With respect to safety for women in our shelter, we have a separate area for women in the main shelter area, including a separate bathroom for women. Unfortunately, the CES spaces are dormitory style and co-ed, and we agree this is not ideal. However, we have overnight staffing in place to provide security and support to our clients. We would be happy to discuss with BC Housing options to improve staffing and facilities at CES to help women feel safer and more secure.

We would also like to note that, in the original design for the facility on Eighth Avenue, PASS included more public space where residents and community members could interact, to encourage more community engagement and integration. Unfortunately, the concept was eliminated under the design constraints of funding for public housing.

Governance

The review provides recommendations for improvements to governance at PASS. We had plans for an organizational review and strategic planning session in 2020, which was postponed due to the crisis presented by COVID-19 pandemic. We acknowledge that the pandemic has delayed our board training, strategic planning and team-building

opportunities, and we are looking forward to restarting this process as COVID-19 restrictions are eased.

A successorship plan for the board and senior management is currently being developed, and we acknowledge that these plans need to be documented in writing, and approved by the board of directors, per best practice for non-profit organizations. PASS commits to do this in 2021.

Operations

The PASS board of directors gives our unqualified support to our executive director and his leadership, which has been essential in the growth of the services and supports that PASS has been able to provide over the past few years. We will continue to work with our executive director, senior leadership team and BC Housing to resolve issues as they arise.

Staffing for the CES, in particular, has been a challenge for PASS over the past year, given limited funding for staffing of this overflow space. We would be pleased to work with BC Housing to address this issue. We are also happy to work with BC Housing on a review of HIFIS data for PASS' shelter program.

Our board is fully aware and has been briefed on the 2019 BC Housing Operational Review of PASS, and on the status of action plan, which we know our staff have been working hard to implement, in spite of the challenges and demands presented by the COVID-19 pandemic. We would be pleased to review the action plan and progress to date with BC Housing at any time, and would also welcome more BC Housing staff support assigned to our team, to collaborate on our efforts for continuous improvement.

Conclusion

PASS has a good working relationship with BC Housing, and welcomes any and all discussions and reviews necessary to improve our service delivery (BC Housing recommendations attached below). We are also pleased to participate in collaborative efforts with Port Alberni City Council, Island Health, BC Housing and other community partners to expand homeless and mental health services in Port Alberni.

Questions regarding this response may be directed to:

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PASS Board Director
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STATEMENT

March 18, 2021

BC Housing

BC Housing to work with Port Alberni Shelter Society to implement report recommendations

PORT ALBERNI – BC Housing secured a third-party contractor to conduct an independent review of operational concerns about the Port Alberni Shelter Society's (PASS) management of two shelters as well as their housing in the community.

The report identifies ten key recommendations to enhance services to clients and to support the Port Alberni Shelter Society's continued operations. Due to privacy considerations, we have released an executive summary of the report and the list of recommendations.

BC Housing will be accepting all the recommendations.

BC Housing is committed to supporting the Society to ensure clients in the community feel welcome, safe and valued and support cultural safety for Indigenous clients. Going forward, BC Housing will continue to work with the society's board of directors and community partners to ensure the recommendations are implemented, some of which the society's Board has already initiated.

We appreciate the consultant's care and attention to developing a thorough report that is the culmination of multiple interviews with clients, community members, the Port Alberni Shelter Society Board of Directors and community partners. The executive summary has been shared with the Port Alberni Shelter Society Board of Directors, the City of Port Alberni and Island Health.

The following includes recommendations from the report and BC Housing's corresponding action plan:

Report recommendation 1: BC Housing should consider the development of an alternate shelter/housing site in Port Alberni with strong mental health and substance use supports. It should be developed collaboratively with local Indigenous representatives to create a service that is welcoming for Indigenous people. To ensure diversity and choice in the community an alternate service provider would be beneficial.

- **ACTION:** BC Housing will continue conversations with the City of Port Alberni and Island Health on increasing sheltering and housing solutions focused on people with higher support needs.

Report recommendation 2: BC Housing should review service restriction and eviction procedures with PASS and ensure that only those who present an imminent health and safety threat are considered for time-limited-service restrictions and evictions. Clearer guidelines for implementing and completing a service restriction should be developed.

- **ACTION:** BC Housing will review service restriction and eviction procedures with PASS to ensure they contain clear and transparent guidelines for when a service restriction is

used. BC Housing recommends the continuation of the community-based, arm's-length Review Committee overseeing service restrictions.

Report recommendation 3: BC Housing should work with PASS to develop more accessible and client-centred complaint and appeal processes for evictions and service restrictions at Our Home, including options for clients who are unable to read or write.

- **ACTION:** BC Housing will support PASS to develop an accessible and client-centred/easy to understand complaint and appeal process, including providing a sample template to PASS, if required.

Report recommendation 4: BC Housing should review current staffing levels at the Emergency Shelter, CES/EWR, and Second Stage Housing operated by PASS to ensure minimum barrier shelter standards can be safely maintained.

- **ACTION:** BC Housing will be reviewing society operations to ensure adequate staffing levels.

Report recommendation 5: BC Housing should work with PASS to ensure the safety of women in their co-ed facilities, adhering to principles of safe access, safe shared spaces, safe sleeping areas, and privacy. PASS must develop practices and standards that minimize the risk of violence and ensure the specialized safety and security needs, specifically for women, are met.

- **ACTION:** BC Housing will review PASS's current shelter layout to ensure it adheres to BC Housing's shelter design guidelines and includes separate and secure sleeping areas for women and allows for safe access and shared spaces.
- **ACTION:** BC Housing will ensure all PASS staff have completed the Online Domestic Violence Safety Planning Training. In addition, BC Housing will facilitate training through HSABC and BCSTH on women's safety in co-ed shelters.

Report recommendation 6: BC Housing should provide clearer guidance regarding best practices for actively welcoming Indigenous peoples to use shelter and housing services and PASS should embed local First Nations culture at its facilities through building stronger relationships with local First Nations and improving Indigenous representation in the organization.

- **ACTION:** BC Housing and the society will work in partnership with the Nuu-Chah-Nulth Tribal Council, Tseshaht First Nation and Hupačasath First Nation on building stronger relationships with Indigenous communities.

Report recommendation 7: PASS must provide more in-depth and effective training and upgrading to their staff and management:

- to be more client-centred, work with sensitivity and be trauma informed.
 - in mental health related topics including de-escalation and violence prevention.
 - for cultural safety, specifically for Indigenous clients, including awareness of local First Nations history.
 - for domestic violence and safety for women in co-ed shelters.
- **ACTION:** BC Housing will request an updated list of all staff and their current training

levels. Based on the review of the list and any gaps of training, BC Housing will facilitate training through the Homelessness Services Association of BC. In addition, BC Housing will ensure that PASS's policy for hiring reflects that this training be commenced within 30 days of employment.

Report recommendation 8: BC Housing should work with the PASS Board of Directors to develop capacity, improve accountability to the community, and to engage in relationship building with other non-profit organizations, local government, and local First Nations communities.

- **ACTION:** BC Housing and the society will work in partnership with the Nuu-Chah-Nulth Tribal Council, Tseshah First Nation, and Hupačasath First Nation on building stronger relationships with Indigenous communities.

Report recommendation 9: BC Housing should support the PASS Board of Directors to conduct an immediate review.

- **ACTION:** BC Housing will support PASS in the review of the policies and procedures to ensure clear, client-centered, unbiased and standardized protocols which meet the needs of the Port Alberni community.

Report recommendation 10: BC Housing should consider establishing a Community Advisory Committee in Port Alberni with oversight and advisory functions. One of its responsibilities could be to monitor service provision to people experiencing homelessness in the community. Membership should include the City of Port Alberni, local Indigenous leadership, and Island Health .

- **ACTION:** BC Housing will establish a Community Advisory Committee. As part of the role of this committee, there will be a review of PASS operating policies and procedures at the shelters.

Link to [PASS Executive Summary and Recommendations](#)

Contact:

BC Housing
Media Relations
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PORT ALBERNI SHELTER SOCIETY REVIEW

REPORT SUMMARY

Port Alberni Shelter Society (PASS) operates a BC Housing funded facility called “Our Home’ in Port Alberni, which was opened in March 2019. Through this facility PASS operates a 23-bed emergency shelter, a 30-unit supportive housing program, and Community Expansion Shelter (CES) Spaces (15 at Our Home and 12 in a separate building). PASS operates other related facilities in Port Alberni, such as the Overdose Prevention Site, which have other funders. This review focuses solely on BC Housing funded facilities operated by PASS.

In response to escalating concerns in the community about services provided by PASS for people experiencing homelessness, BC Housing initiated a review of the organization. BC Housing hired an external consultant to collect information and conduct the arm’s-length review. Due to COVID-19 precautions, information for the review was collected through telephone interviews with local service providers and community partners, former PASS clients and staff, concerned community members, PASS representatives, and relevant BC Housing staff. In total, 26 interviews were conducted for the review and they included both lived experience and professional expertise (front line and management). Community partners were included in the interviews to provide a contextual understanding of the community and the local homeless population. Input from these interviews shaped the observations and recommendations presented in this report.

The interviews highlighted a range of issues regarding service access, the service environment, governance, operations, and community support. They also provided suggestions for remedies which have evolved into the recommendations presented in this report. This review is based upon current BC Housing requirements and guidance; it references relevant Service Agreements and Program Frameworks.

Observations

This section highlights key findings from the interviews conducted for the review.

Service Restrictions: One of the central issues identified by the protesters, service providers and community partners interviewed is that PASS staff issue too many service restrictions, some of which have been long-term, multi-year bans. Some of the interview respondents stated that clients are restricted arbitrarily, often for minimal reasons, and they are also removed from the banned list arbitrarily. People who cannot access the PASS shelter must sleep rough because there is no other shelter in the community. The PASS Policy Manual has policies regarding involuntary discharge and service restrictions; however, they are out of date, unclear, and do not recognize that PASS is the sole emergency shelter provider in the community. According to PASS representatives, the length of the restriction depends on the nature of the incident, with longer term restrictions now going to an arm’s length Review Committee which meets quarterly. According to BC Housing agreements “*Clients should not be refused services unless extenuating health or safety issues are present (e.g., assaults/threats to clients or staff and/or medical needs beyond what the shelter can accommodate).*” The Service Agreement makes no mention of the allowable length of a service restriction, nor if permanent bans are permissible.

Complaints and Appeals Process: Protesters and service providers interviewed report that there is no sufficiently accessible appeal or complaints process for clients who have been barred. They want a process that provides options for complaints and appeals. Some service providers say it is not possible, with the current process, for them to advocate for clients who have been, in their opinion, unfairly barred. In some cases, outreach workers are able to successfully intervene for clients at the shelter, when they know about a service restriction situation. The PASS Policy Manual provides some guidance on the Complaint and Appeal Process; however, given the stated concerns of interview respondents it appears that the relevant policies and procedures in this area may not be adequate or adhered to in a consistent manner.

Mental Health: Interview respondents point out that it is clients with mental health issues, especially those who have associated behavioural problems, who are often the clients barred from the PASS shelter. The protesters say that trauma informed process and support and adequate staff training is needed at the shelter. Interview respondents say current mental health services in Port Alberni are limited and challenging for the most vulnerable to access. Substance use is a barrier to getting assessed and diagnosed. BC Housing requires shelter staff to have training in mental health first aid and crisis prevention and/or de-escalation training and nonviolent intervention.

Minimum Barrier: Interview respondents say PASS is not providing the right type of housing for people with significant mental health concerns. All service providers and community partners interviewed agree that there is no minimal barrier housing or emergency shelter in Port Alberni, but it is desperately needed. The need for low barrier beds and housing for those struggling with addictions, homelessness and mental health has been highlighted by the City of Port Alberni in recent communications with BC Housing.

In the service agreement BC Housing provides the following minimum barrier shelter standards:

MINIMAL BARRIER SHELTER STANDARDS

1. *All providers are expected to operate shelters as minimal barrier unless otherwise approved by BC Housing, depending on the availability of other adequate services in the same community.*
2. *Minimal Barrier shelter means an emergency shelter that accommodates all individuals, twenty-four (24) hours per day, seven (7) days per week, who require shelter services and focuses on bringing people indoors. A minimal barrier shelter should accommodate individuals who:*
 - a. *Require physical accessibility to the shelter and within the shelter.*
 - b. *Are currently experiencing addiction and/or mental health issues.*
 - c. *Have a pet.*
 - d. *Require appropriately sized and secure storage facilities for their belongings, including a cart, bike etc.*
 - e. *Require harm reduction supplies on site, including but not limited to clean needles, access to safe disposal (i.e., sharps containers), condoms etc., and*
 - f. *Require access to primary health care.*

The Service Environment: Many of the interview respondents claim that PASS clients can face stigma, demeaning language, and jail-like rules which are enforced arbitrarily, and some do not feel safe and respected at Our Home. Service providers, community partners and former clients say that while the PASS facility is clean and well maintained it does not provide an atmosphere of dignity and respect for all clients. They are not surprised that some people experiencing homelessness choose not to stay at the shelter. The BC Housing service agreement states that the service environment in an emergency shelter is to be “welcoming, safe and secure”, also “The Provider is expected to create an environment that is supportive of the needs of the clients and provide a sense of community within the development”, and finally, “The provider will ensure that an atmosphere of dignity and respect for all clients is to be maintained”.

Indigenous Clients: Several interview respondents, including Indigenous representatives, confirmed that the homeless population, especially the absolute homeless, are disproportionately Indigenous in Port Alberni. They say that some Indigenous people do not feel safe at Our Home. The clients who are often barred from the shelter or who are asked to leave for minimal or arbitrary reasons are Indigenous with mental health concerns and/or learning disabilities. Indigenous representatives who were interviewed feel adequate staff training, trauma informed practice, and cultural safety are missing from the PASS approach to providing service to Indigenous people. They also say PASS does not reach out to local Indigenous organizations to foster relations with Indigenous leadership. PASS senior management confirmed that there are no Indigenous people employed in management or front-line positions at Our Home. For a shelter that serves a clientele that it is 50% - 60% Indigenous, it is surprising to those interviewed that there is no evidence of Indigenous culture being welcomed or present at the facility. When asked about specific practices for welcoming Indigenous clients at Our Home, PASS representatives emphasized that all clients are treated the same regardless of race.

Female Clients: Some service providers expressed concern about a lack of understanding about women’s safety at PASS. Some interview respondents reported incidents of unwanted sexual attention for female clients staying at the shelter. They say the shelter does not take complaints of sexual harassment seriously and they are met with a “never mind” response from staff. While there is some security at the co-ed CES shelter, the protesters interviewed feel it is not keeping women safe. BC Housing does provide clear direction for addressing the safety of women in co-ed facilities. The Service Agreements require training for domestic violence and safety for women in co-ed shelters.

Senior Management: Some interview respondents have suggested that a change in organizational leadership at PASS would be a positive move for the homeless population and would help win back community confidence in the Society.

PASS Staff: Some interview respondents stated more staffing and better training would allow shelter workers to provide better support to clients and improve safety overall in the shelter. A PASS representative did point out that with the new Our Home facility the shelter capacity increased significantly from 12 beds to 23 beds plus 30 new supportive housing units and CES mats. This has put a strain on the organization, especially in terms of finding adequate staffing in a small town. PASS representatives say that they require their case managers have a Human Service Worker diploma, but it

is unclear how many current staff have this training, or if it is adequate for the workplace demands at PASS.

BC Housing: Service providers and community partners stated stronger BC Housing oversight and leadership will help PASS and the broader community through the current challenges. They say the Society needs BC Housing support and attention to improve operations.

Key Recommendations

The review of PASS resulted in a range of recommendations for change to resolve the issues that were identified through the interviews. Here are the highlighted recommendations.

1. To address current unmet needs in Port Alberni, BC Housing should consider the development of an alternate shelter/housing site in Port Alberni with strong mental health and substance use supports. It should be developed collaboratively with local Indigenous representatives to create a service that is welcoming for Indigenous people. To ensure diversity and choice in the community an alternate service provider would be beneficial.
2. BC Housing should review service restriction and eviction procedures with PASS and ensure that only those who present an imminent health and safety threats are considered for time-limited-service restrictions and evictions. Clearer guidelines for implementing and completing a service restriction should be developed.
3. BC Housing should work with PASS to develop more accessible and client-centred complaint and appeal processes for evictions and service restrictions at Our Home, including options for clients who are unable to read or write.
4. BC Housing should review current staffing levels at the Emergency Shelter, CES/EWR, and Second Stage Housing operated by PASS to ensure minimum barrier shelter standards can be safely maintained.
5. BC Housing should work with PASS to ensure the safety of women in their co-ed facilities, adhering to principles of safe access, safe shared spaces, safe sleeping areas, and privacy. PASS must develop practices and standards that minimize the risk of violence and ensure the specialized safety and security needs, specifically for women, are met.
6. BC Housing should provide clearer guidance regarding best practices for actively welcoming Indigenous people to use shelter and housing services and PASS should embed local First Nations culture at its facilities through building stronger relationships with local First Nations and improving Indigenous representation in the organization.
7. PASS must provide more in-depth and effective training and upgrading to their staff and management:
 - a. to be more client-centred, work with sensitivity and be trauma informed.

- b. in mental health related topics including de-escalation and violence prevention.
 - c. for cultural safety, specifically for Indigenous clients, including awareness of local First Nations history.
 - d. for domestic violence and safety for women in co-ed shelters.
8. BC Housing should work with the PASS Board of Directors to develop capacity, improve accountability to the community, and to engage in relationship building with other non-profit organizations, local government, and local First Nations communities.
 9. BC Housing should support the PASS Board of Directors to conduct an immediate review.
 10. BC Housing should consider establishing a Community Advisory Committee in Port Alberni with oversight and advisory functions. One of its responsibilities could be to monitor service provision to people experiencing homelessness in the community. Membership should include the City of Port Alberni, local Indigenous leadership, and Vancouver Island Health Authority.