OPERATIONAL STANDARDS FOR GUEST MANAGEMENT AND WELLNESS CHECK POLICIES

Introduction

This document provides operational standards to non-profit housing providers to develop and update their own guest management and wellness check policies at BC Housing funded supportive housing units. These policies are to be developed and maintained by non-profit housing providers, as they carry the deepest level of insight into the operational realities and have existing relationships with tenants. This document lays out a set of key principles that BC Housing expects providers to align with and blend these principles into their guest management and wellness check policies. This document then gives some detailed operational examples of what providers may choose to include in their policies, while including some considerations that can help improve the effectiveness of guest management and wellness check policies.

Context

The Government of British Columbia has made changes to the Residential Tenancy Regulation (RTR) to exempt housing that meets the definition of supportive housing from sections of the *Residential Tenancy Act (RTA)* and RTR that prohibit guest management and wellness check policies. Notwithstanding the sections of the RTA and RTR for which supportive housing is exempt, all other sections of the RTA and RTR continue to apply to supportive housing. These RTR changes acknowledge the complex operational realities of supportive housing and help resolve the confusion within the supportive housing community regarding how the RTA and RTR apply to supportive housing. To ensure the correct interpretation of supportive housing is understood, the regulatory change includes the updated definition of supportive housing, and the impacted provisions of the RTA, linked below. It is important to note that the RTA exemptions will not apply to other forms of supportive housing that are covered under different legislation, such as the *Community Care and Assisted Living Act*.

Supportive Housing definition:

Policy Guideline 46: Transitional Housing, Supportive Housing, Health Facilities (gov.bc.ca)

Residential Tenancy Act:

Residential Tenancy Act (gov.bc.ca)

The intention behind implementing policies for guest management and wellness checks in supportive housing units is to ensure the safety and security of all tenants and supportive housing staff. BC Housing understands that there is variation in the type of language included in existing guest management and wellness check policies, depending on the provider's approach, community dynamics, building design (i.e. modular, purpose built, former hotels, tiny homes etc.), and operational realities. While acknowledging this variation, it is valuable to highlight some overarching principles that BC Housing expects providers use as a compass for their policies.

Guest Management and Wellness Check Policy Principles

Providers should use the following guiding principles when developing guest management and wellness checks policies, to provide consistent and fair policies for all tenants and staff.

Embracing these principles aligns with existing contractual language in supportive housing service agreements between BC Housing and housing providers. This language requires operations at supportive housing buildings be transparent and accountable and stipulates that an atmosphere of dignity and respect must be maintained.

Before developing a guest management and/or wellness check policy, it is important that providers consider how their policies will impact tenants living in supportive housing units. Below are some fundamental principles.

- Promoting a safe environment for the wellbeing of tenants and staff
 The purpose of creating policies for guest management and wellness checks is to
 contribute to supportive housing spaces where tenants, guests, and staff feel safe and
 respected. Given that the fundamental objective of supportive housing is to help people
 who have been experiencing or who are at risk of homelessness gain greater
 independence and achieve personal and housing goals, fostering a positive atmosphere
 is vital. Relationship building and trust amongst tenants and staff are key elements to
 creating a healthy and safe supportive housing environment, and guest management
 and wellness check policies should strive to reinforce these principles.
- Rights-based policies
 Providers must ensure their policies and practices uphold the human rights of all tenants, as prescribed under the United Nations Declaration on the Rights of Indigenous Peoples, the BC Human Rights Code, and the Canadian Charter of Rights and Freedoms. RTA exemptions do not preclude or dismiss rights assigned under the above pieces of legislation.
- Policies are informed through an equity, diversity, inclusion and belonging lens With the province's commitment to reconciliation and anti-racism, it is critical that providers develop quest management and wellness check policies that are informed by a commitment to non-discrimination of all forms, including race, religion, culture, sexual orientation, gender identity, social condition, or level of physical ability. Policies should be created with the understanding that many tenants living in supportive housing are from marginalized communities and have lived experience of discrimination and trauma relating to these experiences. Where possible, non-profit housing providers are encouraged to involve supportive housing tenants in the development and/or implementation of guest management and wellness check policies. Cultural safety and trauma informed approaches should be woven into all guest management and wellness check policies, especially considering that a sizeable percentage of supportive housing tenants identify as Indigenous. It is vital that non-Indigenous housing providers make the effort to understand the damaging impacts of colonization, and how their present-day impacts manifest in supportive housing environments. Providers should strive to create policies that navigate the intricacies of guest management and wellness checks in a thoughtful and trauma-informed manner.

The application of guest management and wellness check policies should recognize the diversity of tenants' needs. How supportive housing staff conduct wellness checks and manage guests should be predicated on the needs of tenants and building relationships between tenants and staff.

• Transparency of policies

There must be a sufficient level of transparency pertaining to the content of providers' guest management and wellness check policies. All tenants must have access to the building's policies upon moving into their home, and supportive housing staff should be provided all policies as part of staff training packages. If a tenant needs the policy in another language providers must distribute a translated version in the tenant's preferred language. Providers should ensure they disseminate a physical copy of their policies. Having staff read guest management and wellness check policies to tenants who may not be able to read or write would be beneficial to ensure the highest level of transparency. Transparency will ensure tenants are fully aware and understand the implications of policies on their tenancy.

• Feedback & Complaints Resolution Policies & Processes
Providers should develop policy and processes to invite feedback from tenants around guest management and wellness check policies.

Supportive housing providers must have a complaints resolution policy, coupled with an escalation process for when a complaint is brought forward by a tenant. Providers must review their complaints resolution policies regularly and make revisions if necessary to align with the above guiding principles. Complaints resolution policies must be transparent and readily available and ensure non-retaliation for all tenants and staff.

Guest Management Policy Standards

At their core, the intent of a guest management policy is to support an inclusive and safe environment for all tenants, staff, and guests. Maintaining a safe housing environment is essential for the health and wellbeing of all tenants. Having measures in place to mitigate harmful and disruptive guest behaviour provides a level of security and comfort for everyone in the building. For guest management policies to be inclusive and trauma informed, providers should consider actively engaging tenants to be part of the process of creating the guest management policy.

It is important to note that in light of the changes being made to the RTR, a provider is not mandated to implement guest *restriction* practices. However, BC Housing requires a written *guest management policy* that sets clear expectations for tenants and their guests. These expectations need to be clearly developed and communicated to staff and tenants.

Below is a non-exhaustive list of measures that providers can consider when designing or updating their guest management policies.

Visiting hours

Set visiting hours may be implemented by the provider, such as limiting or prohibiting overnight guests, or having a maximum number of guests per day, week, month, or year. It is important to clearly communicate these rules to all tenants. Providers should have a documented process in place for disseminating guest management policies to tenants,

which may include asking for a tenant signature and/or reading the policy aloud to the tenant. Providers should make every effort to allow guests to visit tenants. Having clearly designated visitor weeks that permit guests during the day and evening could be a practical way for providers to implement reasonable guest restriction practices as part of their overall guest management policies. Providers should consider the administrative burden of implementing maximum number of stays in their guest, and whether they have the staff capacity to keep accurate tracking of guest numbers. In addition, providers should carefully reflect on whether implementing various degrees of guest restriction practices may create an undue burden on the tenants' tenancy.

Providers whose policies include language prohibiting overnight guests, or limiting daytime guests, should consider the positive physical and mental health implications that social interactions have on tenants. Some tenants may rely on regular in-person visits from family and friends in maintaining healthy personal relationships and improving their mental health. The importance of social connection has been specifically highlighted by Indigenous people as being incredibly valuable for overall quality of life. For vulnerable tenants who have found housing stability after experiencing homelessness or being at risk of homelessness, the agency to connect with family and friends in their home helps prevent social isolation and supports healthy social skills.

Preventing harmful behaviour

It also needs to be recognized that there are serious situations that can occur in supportive housing, including intimate partner violence, unit takeovers, and other forms of exploitation. To prevent harmful behaviour and violence, providers may decide to restrict certain individuals from entering a building based on a request from a tenant, or through a provider's assessment that an individual poses a threat to tenants or staff. Guest policies should clearly describe the circumstances in which an individual restriction may be applied and create an accessible avenue to appeal individual guest restrictions for tenants.

Guest sign-in & Age/ID

Controlled access through guest sign-in at the staff front desk may be required by providers at supportive housing buildings. Providers may want to consider whether guests are required to present identification (and what form of ID) or need only to record their name and contact details in a visitor logbook. It should be recognized that some guests may not have formal identification, and providers policies should not create an undue barrier on these individuals wishing to visit family or friends.

Providers may choose to limit the age of guests to adults 19 years and older. The decision to set an age restriction may be to limit the exposure of children and youth to substance and alcohol use that could be taking place in the building. Special considerations may be made to permit a tenant's child(ren) and youth family members to visit their home. Having a documented process in place that outlines how and when special considerations can be made to allow children or youth to safely visit a tenant would be beneficial to tenants, staff, and guests to ensure the greatest level of fairness and consistency is maintained. Conversely, if a provider chooses to make special considerations for certain tenants and guests without using a documented process this could lead to allegations of favouritism and discrimination against the provider.

Tenant accompaniment of quests

Providers may require tenants to always accompany guests on the premises, and/or meet them at the building entrance, and prohibit guests from entering amenity spaces or other common areas in the building. Meeting a guest at the building entrance may not always be feasible, especially for tenants who have limited mobility. Alternatively, for buildings that have an intercom connected to the tenant's unit buzzer the provider may give the tenant the ability to let their guests in remotely.

• Guests living in a tenant's unit

If a guest is found to be living in a tenant's unit for a significant period of time, the provider should request that the guest show proof of primary address elsewhere. The provider may consider having a process in place to determine if the guest is experiencing homelessness or at risk of homelessness. If the guest is found to be experiencing homelessness, the provider may offer resources to the individual to help them find their own housing. The provider's guest management policy should clearly outline the potential consequences for a guest that is living in a supportive housing unit with a tenant, which may include restricting future building access for the guest. Providers should make every effort to reach a positive outcome in these situations, and it is at the discretion of the provider to determine whether a guest needs to be removed from a tenant's unit.

Guest conduct

Providers should have an escalation process in place to respond to harmful and/or violent guest behaviour directed towards tenants, staff, or other guests in the building. Providers may consider whether giving a warning to the tenant's guest, either verbal or written is appropriate, or if other action is needed to ensure the safety of everyone in the building. Providers have the ability to state in residency agreements that tenants are responsible for the behaviour of their guests, and it is advisable they also include these responsibilities in their guest policies. This means that a tenant is responsible for interactions that their guest has with all staff, tenants and fellow guests in the building, as well as for any form of physical damage that is done to the property. It is key for tenants to be fully informed of these responsibilities upon moving into a supportive housing unit. Ultimately if a tenant's guest impacts the safety of others or damages the property, this could lead to an eviction notice.

Wellness Check Policy Standards

Wellness checks are used to make sure tenants are safe and secure in their home, and in practice are a lifesaving tool that many providers employ. Health and wellness checks can be an opportunity for a staff member to establish a line of communication with a tenant and confirm their health and wellbeing.

Wellness check policies should be created and implemented from a place of non-judgement, with the health and wellbeing of tenants being the primary focus. Having a written wellness check policy that sets clear expectations for tenants is required for a provider to have in place. Similar to guest management policies, tenants should be made aware of a provider's wellness check policy, and the provider should circulate it amongst all tenants upon a tenant moving into their unit.

While carrying out wellness checks policies it is important for the provider to respect the privacy rights and confidentiality of tenants. Entering a tenant's private residence, especially if the visit is not a scheduled one, can be viewed as an intrusive and extreme measure. This highlights the importance of making tenants feel as comfortable as possible in the building, and to listen to any questions, concerns, ideas or other feedback from tenants when it comes to how and when wellness checks take place.

There are some considerations providers should make when creating or revising their wellness check policies. The following are some examples:

• Establishing Wellness Check Frequency

For BC Housing-funded supportive housing buildings with 24/7 supports, providers are required to conduct wellness checks, as specified in service agreements with BC Housing, as seen below:

"The Provider will establish regular health and wellness checks for Tenants, including an escalation procedure which may warrant room checking, when a Tenant has not been seen or heard from for an extended period, not to exceed forty-eight (48) hours."

While BC Housing agreements require a wellness check to be conducted if a tenant has not been seen or heard from for a maximum of forty-eight hours, BC Housing recognizes that many providers may want to perform wellness checks more frequently. As a best practice, providers should have wellness check processes clearly documented for staff use **and tenant awareness**. Documented processes should include recording when a wellness check takes place, the frequency that wellness checks occur, and clear reasoning if it is determined that the frequency of wellness checks for a tenant need to increase.

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Methods of Connection

Providers can consider a variety of contact methods to get in touch with tenants. Recreational activities, workshops, and other social gatherings organized for tenants in supportive housing amenity spaces can be an ideal place to check in with tenants without it being interpreted as intrusive. For some supportive housing buildings that use fobs for tenants to enter the building, conducting a fob check could be an appropriate way to have a less intrusive wellness check. Other ways of checking in on a tenant may be through meal programs (i.e., confirming meal was received), a phone call, or visual sighting of the tenant via security camera footage or an in person sighting in the building by staff. If a physical entry into a tenant's unit is necessary, providers may want to have specific staff members carry out a wellness check for certain tenants. For example, if it is determined a door knocking wellness check is required for a female tenant in the night, the provider might choose to have a female staff member check in on the tenant. This emphasizes the importance of having trauma-informed and tenant-centred policies.

It is critical to differentiate between staff entering a tenant's unit for a wellness check, and entry into a tenant's unit for other reasons, such as a routine unit inspection, or unit repair. These other reasons for unit entry still must comply with provisions of the RTA that specify the requirement for a twenty-four (24) notice to be given to the tenant.

At Risk Tenants

In the event of a medical emergency during a wellness check, such as a tenant overdose, provider staff must have the appropriate level of training, including First Aid, CPR and Naloxone training to act in an emergency. This training is required, as stated in supportive housing service agreements between providers and BC Housing. Providers may want to monitor at-risk tenants who may engage in high-risk substance use practices or have deteriorating physical or mental health circumstances. It may be deemed that wellness checks may be appropriate for the safety and welling of these tenants.

Providers should do everything they can to avoid taking a punitive approach in their wellness check policies. For example, if in the event of a wellness check a tenant is found to be having challenges with personal hygiene, hoarding, or property damage, it may be best to take a health focused approach and offer support if needed, rather than penalizing the tenant.

CONCLUSION

During the development, implementation and maintenance of guest management and wellness check policies, providers must appreciate the multifaceted impact that these practices can have on all tenants and staff of supportive housing buildings. Providers must balance the need to maintain safety and security, with the ability of tenants to enjoy freedom and privacy in their home. It is crucial that guest management and wellness check policies are informed by a deep understanding of antidiscrimination, and that policies are grounded in cultural awareness. Tenants having an active role in communicating their needs and thoughts as it relates to guest management and wellness check policies can increase the chance of their success and sustainability over the long term.