Risk Management Considerations for Managing Transitional and Emergency Housing

Helping Municipalities and Partners Manage Transitional and Emergency Housing Safely

Providing shelter for vulnerable individuals comes with important responsibilities. As municipalities and service providers continue to support people experiencing homelessness, domestic violence, or other crises, it's essential that housing facilities are not only safe and supportive but that risk exposures are proactively managed.

This article outlines risk management strategies for emergency shelters and transitional housing based on frontline guidance and regulatory expectations. Our goal is to help you provide dignified services while minimizing liability and operational disruption.

Understanding Shelter Types

Emergency Shelter

- Short-term, basic accommodation (less than 3 months).
- May or may not include meals, clothing, or counselling.
- Often used during acute crises (e.g., homelessness, natural disasters).

Transitional Housing

- Longer-term (3 months to 3 years), structured support.
- Offers stability and services to help individuals transition to permanent housing.
- Includes life skills, employment support, and access to community resources.

Risk Exposures

Transitional housing and emergency shelters provide critical services, but they also face unique risk exposures that require careful management and consideration:

1. **Resident Safety & Security Risks**
   - Violence and conflict, unpredictable behaviour.
   - Unauthorized visitors and security breaches.
   - Criminal activity, substance use, and medical emergencies related to vulnerable populations.
2. **Premises Liability & Environmental Risks**
   - Slip, trip, and fall hazards.
   - Overcrowding and fire safety concerns.
   - Compliance with building codes and sanitation/ infectious disease control.
3. **Staff & Volunteer Risks**
   - Workplace violence or assault.
   - Psychological stress and burnout.
   - Lack of training and allegations of negligence or misconduct.
4. **Abuse, Neglect & Legal Liability Risks**
   - Allegations of staff misconduct or abuse.
   - Failure to report incidents or discharge residents properly.
   - Risk of serious legal and reputational damage.
5. **Financial & Operational Risks**
   - Funding instability.
   - Business continuity issues.
   - Cybersecurity and data privacy threats.
6. **Property & Asset Protection Risks**
   - Vandalism, theft, and extreme weather events.
   - Utility failures or infrastructure breakdowns that displace residents.

These risks reinforce the importance of a robust, documented, and proactive approach to shelter operations.

Risk Management Considerations

1. **Resident Safety & Security**
   - Secure, warm, and clean sleeping areas.
   - Lockable personal storage (e.g., lockers or bins).
   - CCTV in common areas while respecting privacy.
   - Safe lighting, emergency exits, and smoke detection.

- Controlled access (sign-in/out, keycards).
- Limiting unauthorized visitors and protecting staff areas.

2. **Health, Harm Reduction & Medical Needs**
   - First aid supplies and overdose prevention kits (e.g., Naloxone).
   - Sharps disposal in puncture-proof containers and regular servicing of containers.
   - Emergency contact info for local overdose and medical response teams.
   - Hygiene and sanitation: clean bathrooms, accessible showers, and laundry.
   - Nutritious meals, allergy and dietary accommodations.
3. **Support Services for Residents**
   - On-site or on-call staff such as case managers, social workers, or housing navigators.
   - Access to phones, internet, and transportation.
   - Conflict mediation and trauma-informed support.
   - Mental health and addiction services.
4. **Staff Training & Oversight**
   - De-escalation and conflict resolution.
   - Mental health first aid and overdose response.
   - Identifying abuse or neglect.
   - Infection prevention and sharps handling.
   - Maintaining appropriate staffing ratios and supervision.
5. **Physical Premises Safety**
   - Compliance with building, fire, and accessibility codes.
   - Regular safety inspections (e.g., slips, exposed wiring, exits).
   - Up-to-date fire alarms, emergency lighting, and signage
   - Logs for cleaning, repairs, and safety checks.
6. **Legal, Insurance & Documentation**
   - Ensure vendors (e.g., food, health outreach) carry liability insurance and name the municipality as an additional insured.
   - Require signed waivers or informed consent, where appropriate.
   - Maintain resident agreements and house rules.
   - Incident reporting and documentation protocols.
   - Keep records of all safety incidents, complaints, and inspections.

Change of Use and Building Code Requirements

If you're repurposing a building for emergency or transitional housing, a Change of Use Permit may be required, even without construction. This includes:

- Ensuring the building can safely support the proposed use
- Confirming the occupancy type (Group B or Group C based on supervision and care level)
- Building Code upgrades, such as:
  - Fire separation and suppression systems
  - Exit signage and emergency lighting
  - HVAC and plumbing fixture assessments
  - AODA and accessibility features
- A final inspection and occupancy approval are required before the facility can be opened to residents

When Does Your Legal Duty End?

Municipalities are expected to offer reasonable supports and accessible shelter options before issuing trespass notices. However, when residents refuse appropriate accommodations, they may be viewed as trespassers, and the municipality's legal duty to those individuals may be considered met, especially where public safety concerns are high.

Want to Learn More?

Our Risk Management team is here to help your municipality or housing provider navigate operational, legal, and regulatory risks. Reach out for:

- Policy and procedure templates
- Staff training recommendations
- Incident reporting tools and best practices

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