

File No.: 04-1000-20-2025-467

October 17, 2025

s.22(1)

Dear s.22(1)

Re: **Request for Access to Records under the Freedom of Information and Protection of Privacy Act (the "Act")**

I am responding to your request of July 21, 2025 under the *Freedom of Information and Protection of Privacy Act* for:

Record of full texts of all audits from the City's internal audit branch. Date range: November 15, 2024 to July 20, 2025.

All responsive records are attached. Some information in the records has been severed (blacked out) or withheld under s.15(1), s.22(1) and s.22(3)(d) of the Act. You can read or download these sections here:

http://www.bclaws.ca/EPLibraries/bclaws_new/document/ID/freeside/96165_00.

Please also note, Internal Audit staff have advised our office that all other responsive audit reports have been posted on the City's website and can be found at the following location:
<https://vancouver.ca/your-government/internal-audit-reports.aspx>.

Under Part 5 of the Act, you may ask the Information & Privacy Commissioner to review any matter related to the City's response to your FOI request by writing to: Office of the Information & Privacy Commissioner, info@oipc.bc.ca or by phoning 250-387-5629.

If you request a review, please provide the Commissioner's office with: 1) the request number (2025-467); 2) a copy of this letter; 3) a copy of your original request; and 4) detailed reasons why you are seeking the review.

Yours truly,

[Signed by Cobi Falconer]

Cobi Falconer, MAS, MLIS, CIPP/C
Director, Access to Information & Privacy

If you have any questions, please email us at foi@vancouver.ca and we will respond to you as soon as possible. You may also contact 3-1-1 (604-873-7000) if you require accommodation or do not have access to email.

Encl. (Response Package)

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CITY OF VANCOUVER
INTERNAL AUDIT REPORT
Gathering Place Operational Audit

EXECUTIVE SUMMARY

November 13, 2024

The Gathering Place Operational Audit reviewed key controls and business processes at the Gathering Place Community Centre (Gathering Place) related to occupational health and safety, site security, procurement, legal obligations and cash handling. The objective was to determine the extent of compliance to applicable policies and procedures and verify the effectiveness and efficiency of internal controls and business processes.

In our opinion, internal controls related to Gathering Place's key business processes require improvement. We have noted areas where additional training and guidelines are required as well as instances where existing processes and controls have not been fully complied with. By addressing these identified improvement areas, Gathering Place will be better able to meet its service objectives while also mitigating potential risks to the safety of staff, patrons and volunteers, and ensuring compliance with WorkSafeBC regulations.

The more significant findings and recommendations are:

Perform hazard assessments and create comprehensive training materials for all staff (Finding E.1)

There are no formal departmental hazard assessments performed for staff roles and no formal training materials developed or provided to staff. Doing so is important to ensure staff can identify hazards, understand how to treat hazards effectively and have Standard Operating Procedures to refer to when needed. Management has committed to completing hazard assessments and creating and providing Standard Operating Procedures and training to staff.

s.15(1)

 Carmen Fuellbrandt, CPA, CMA, CIA Chief of Internal Audit	 Carolyn Lok, CPA, CA, CIA Senior Internal Auditor
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A. BACKGROUND

The Gathering Place Community Centre serves the Downtown South community of Vancouver by offering a variety of programs and services. It focuses on supporting vulnerable populations, including low-income individuals, people with disabilities, seniors, those from diverse ethnic backgrounds, the LGBTQ+ community, youth, and individuals facing homelessness.

The Centre provides programs centered on essential services. This includes a health centre with showers and laundry, affordable meals, an overnight shelter, a learning centre managed by the Vancouver School Board, a library managed by Vancouver Public Library, recreational activities, arts and culture initiatives, and community development efforts.

A Workplace Violence Risk Assessment was completed for Gathering Place on September 28, 2023, by the Social Operations and Human Resources departments which assessed the overall risk rating of Gathering Place to be Moderate, along with a list of recommendations to enhance the security level.

Departments at Gathering Place includes Administration, Recreational Program, Kitchen, Reading Room, Health Centre and Security. However, the two departments with a higher inherent risk of violence or hazard exposure would include Security and Health Centre.

Security

Gathering Place security staff function independently from City Protective Services (CPS). The Arts, Culture and Community Services (ACCS) department employs its own security staff, with CPS serving as a resource and support role. The ACCS Manager of Security and Violence Prevention supports Social Operations and Non-Market Housing Operations to help with functions such as staff training, risk assessments, investigations and consultation support.

There are two teams of security staff at Gathering Place:

1. Daytime security s.15(1)
2. Nighttime shelter security s.15(1)

Health Centre

The Health Centre provides patrons with access to clothing, laundry services, delousing and shower facilities. s.15(1)

s.15(1) Security incidents encountered may include confrontations with upset patrons over prolonged shower usage or discovering needles in pockets during laundry services.

B. SCOPE

The Gathering Place Operational Audit was initiated to determine the extent of compliance to applicable policies, procedures and regulations, and verify the effectiveness and efficiency of internal controls and business processes.

The audit scope included a review of key controls and business processes related to occupational health and safety, site security, procurements, legal obligations and cash-handling. Audit procedures included:

- Interviews with key management and staff;
- Review of relevant policy and procedure documentation; and
- Sample review of transactions and examination of supporting documentation.

Gathering Place collaborates with the Downtown South Gathering Place Community Centre Association through a Joint Operating Agreement to coordinate consultations and deliver core services to patrons in the area. The Vancouver Public Library and Vancouver School Board are also separate organizations that operate within the overall facility but function independently. Processes and transactions related to these organizations were not in scope.

The audit is not designed to detect fraud. Accordingly, there should be no such reliance.

C. CONCLUSION

In our opinion, internal controls related to Gathering Place's key business processes require improvement. We have noted areas where additional training and documentation are required, and areas where existing processes and controls have not been fully complied with. By addressing these identified improvement areas, Gathering Place will be better able to meet its service objectives in an effective and efficient manner.

Findings and recommendations have been discussed with appropriate management and responses incorporated in this report. We thank management and staff at Gathering Place for their cooperation and assistance during this audit.

D. RISK ANALYSIS

The potential significant risks considered if controls were not in place are:

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E. AUDIT ISSUES, RECOMMENDATIONS AND MANAGEMENT RESPONSES

OCCUPATIONAL HEALTH AND SAFETY

E.1 Perform hazard assessments and create comprehensive training materials for all staff

Upon hiring of new staff at Gathering Place, a general orientation and review of the City's Employee Safety Orientation Checklist is completed with one of the daytime security staff managers. Staff are then trained in their respective departments by job shadowing a few work shifts.

As required by Workers Compensation Act¹, employers must ensure workers are made aware of all known or reasonably foreseeable health or safety hazards to which they are likely to be exposed by their work. This includes providing employees the information, instruction, training and supervision necessary to ensure the health and safety of those workers in carrying out their work.

Although the Employee Safety Orientation Checklist lists general site hazards at Gathering Place, the training is not comprehensive and there are no detailed Standard Operating Procedures available to staff.

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It is essential to communicate the various risks and ensure staff receive training on the appropriate response procedures. This should not only be addressed in the training sessions but also accompanied by documented procedures for staff to reference.

Having clear documentation is an important part of due diligence as required by WorksafeBC regulations. This also includes documentation of training provided to staff to show due diligence was exercised to minimize the chance of health and safety incidents. Training provided to staff is currently not tracked, but it is important to do so as it could be used as evidence during a WorkSafeBC inspection or following an incident.

Ensure signed Employee Safety Orientation Checklists are documented and retained in a central location

New employees are asked to sign to confirm their understanding and review of the Employee Safety Orientation Checklist. Internal Audit reviewed a sample of checklist documentation for 11 of the 126 Gathering Place staff. There were three exceptions of missing employee signatures or missing staff checklists. It is important to retain this documentation in the event of a future WorksafeBC investigation.

Recommendations:

E.1.1 The Director of Gathering Place should ensure hazard assessments are performed for all applicable roles and areas. This includes, and is not limited to, the Security department, the Kitchen department, the Health Centre, weight room and art room. This assessment should be completed by December 31, 2025.

Management Response:

Please check one:

☒ Agree with the findings

☐ Disagree with the findings

Please check one:

☒ Agree with the recommendations

☐ Disagree with the recommendations

Management Action Plan:

Gathering Place management will establish a multidisciplinary team, including employees with subject matter expertise, a management representative, and a Safety Specialist, to conduct comprehensive hazard assessments for all relevant roles and areas. This team will systematically analyze workflows and tasks to identify associated risks. Based on the findings, policies and practices will be developed to mitigate or eliminate hazards, with an evaluation process to ensure effectiveness. All stakeholders will be informed and engaged in the integration of these safety measures.

¹ Works Compensation Act Section 21

E.1.2 The Director of Gathering Place should create formal training materials and Standard Operating Procedures for all applicable departments. This should include but is not limited to Security, Kitchen and the Health Centre. The training material should be completed by December 31, 2025.

Management Response:

Please check one:

- ☒ Agree with the findings
☐ Disagree with the findings

Please check one:

- ☒ Agree with the recommendations
☐ Disagree with the recommendations

Management Action Plan:

Gathering Place management will develop Standard Operating Procedures (SOPs) and formal training materials for all applicable departments, including Security, Kitchen, and the Health Centre. These resources will ensure consistency, compliance, and best practices across operations. A structured implementation plan will be established to support effective integration and ongoing review.

E.1.3 The Director of Gathering Place should create a system to track health and safety training provided to staff members along with completed dates. This should be completed by June 30, 2025.

Management Response:

Please check one:

- ☒ Agree with the findings
☐ Disagree with the findings

Please check one:

- ☒ Agree with the recommendations
☐ Disagree with the recommendations

Management Action Plan:

Gathering Place management will implement a system to track health and safety training for all staff, including training topics, completion dates, and renewal requirements. This system will ensure compliance, support accountability, and facilitate ongoing staff development.

E.1.4 The Director of Gathering Place should establish a process to ensure all Employee Orientation Safety Checklists have been signed upon review and securely stored in a centralized location for the required retention period. This process should be implemented by June 30, 2025.

Management Response:

Please check one:

- ☒ Agree with the findings
☐ Disagree with the findings

Please check one:

- ☒ Agree with the recommendations
☐ Disagree with the recommendations

Management Action Plan:

Gathering Place management will establish a standardized process to ensure all Employee Orientation Safety Checklists are reviewed, signed, and securely stored in a centralized location for the required retention period. This process will support compliance, accountability, and easy access for audits or reference.

E.2 Implement additional controls around volunteer management

Perform hazard assessments for volunteer placements

The City's Volunteer Engagement Policy (ADMIN028) requires employers to identify and address potential hazards of a volunteer's placement.

Volunteers play a significant role at Gathering Place, helping in areas such as food preparation, laundry support, sanitization of gym equipment, supervision for the Games Rooms, or special events. General training is provided to all volunteers upon hire, with a few areas with department-specific orientation. However, all training is very high-level and does not cover potential hazards related to their placement. Such hazards could include exposure to drug paraphernalia or physical violence.

Hazard assessments have not been conducted for volunteer roles. It is important to assess and communicate all potential hazards and risks clearly, ensuring volunteers feel comfortable with their responsibilities and understand how to respond in the event of an incident.

All volunteers working with vulnerable people should require Police Record Checks

Currently, Police Record Checks are mandatory for Gathering Place volunteers who work independently and unsupervised with vulnerable populations. However, volunteers interacting with vulnerable people under supervision by community centre staff are not required to undergo a Police Record Check.

The City's Volunteer Engagement Policy (ADMIN028) requires Police Record Checks for all volunteers working with vulnerable population, regardless of whether they are also supervised by staff while working. To ensure adequate screening of those working with vulnerable individuals, Gathering Place's procedures should be revised to ensure all volunteers working with vulnerable individuals undergo these checks.

Ensure all volunteers are tracked

Currently, the attendance of volunteers during their shifts is not monitored. A volunteer sign-in system is crucial for fire wardens to verify the presence of volunteers during evacuations, ensuring that no one is inadvertently overlooked. Therefore, a volunteer tracking system should be established to help the organization meet its due diligence responsibilities as an employer.

Recommendations:

E.2.1 The Director of Gathering Place should identify all potential hazards associated with volunteer placements and document the communication of these risks to the volunteers prior to commencement of their roles. This should be completed by December 31, 2025.

Management Response:

Please check one:

☒ Agree with the findings

☐ Disagree with the findings

Please check one:

☒ Agree with the recommendations

☐ Disagree with the recommendations

Management Action Plan:

Gathering Place management will identify potential hazards associated with all volunteer placements and ensure these risks are clearly communicated to volunteers before they begin their

roles. A Volunteer Handbook will be developed to outline role-specific hazards, safety protocols, and emergency procedures. This resource will be incorporated into the volunteer onboarding process to enhance awareness, preparedness, and overall safety.

E.2.2 The Director of Gathering Place should ensure that all new volunteers working with vulnerable populations complete a Police Record Check, regardless of whether they are working independently or under supervision by community centre staff. A review of active volunteers should be conducted to identify volunteers missing these checks and ensure they are completed as soon as possible. This should be completed by March 31, 2025.

Management Response:

Please check one:

☒ Agree with the findings

☐ Disagree with the findings

Please check one:

☒ Agree with the recommendations

☐ Disagree with the recommendations

Management Action Plan:

Gathering Place management will conduct a thorough review of all current volunteers to ensure that all volunteer Police Record Checks are in place, retained, and tracked for expiry. This practice will be employed going forward for all volunteer placements. This will be completed by March 31, 2025.

E.2.3 The Director of Gathering Place should establish a volunteer sign-in system to ensure the presence of all volunteers are monitored in the event of a site evacuation. This should be completed by September 30, 2025.

Management Response:

Please check one:

☒ Agree with the findings

☐ Disagree with the findings

Please check one:

☒ Agree with the recommendations

☐ Disagree with the recommendations

Management Action Plan:

Management has agreed with the finding and recommendation.

E.3 Ensure all training and certification renewals are documented

Maintain tracker for staff health and safety certifications and training

Various staff require health and safety certifications to be active and in good standing to perform their roles. Health Centre staff are required to have Occupational First Aid certification and Kitchen staff are required to have Foodsafe certification.

Internal Audit reviewed certifications from 19 staff in the Kitchen and Health Centre to verify their valid respective Foodsafe and Occupational Health Certificate certificates. Three expired certifications were found.

Management introduced an excel tracker in August 2024 to monitor all staff certification renewals, training and deadlines but it is not widely used. It is important to communicate this to all staff and encourage its usage.

Staff to keep Nonviolent Crisis Intervention Course up-to-date

There is a Nonviolent Crisis Intervention (NVCi) course that is required to be taken by all staff working within Social Operations, Non-Market Housing, and Homelessness Services. It is provided by the ACCS Managers of Security and Violence Prevention and provides staff with skills to recognize and respond to crises that may involve more challenging patron behaviors. The course is valid for two years and needs to be retaken upon expiry.

Ten employees were selected randomly to assess their NVCi renewal status; nine of these employees' courses were either beyond the expiry period or the last completion date was unknown. Given the nature of the work involved at Gathering Place, it is crucial that all staff possess updated skills to minimize the risk of violence.

Recommendations:

E.3.1 The Director of Gathering Place should identify all missing training and outdated staff certifications (Occupational First Aid, Foodsafe certifications and Nonviolent Crisis Intervention Course) and ensure they are completed as soon as possible. This should be completed by March 31, 2025.

Management Response:

Please check one:

☒ Agree with the findings

☐ Disagree with the findings

Please check one:

☒ Agree with the recommendations

☐ Disagree with the recommendations

Management Action Plan:

Gathering Place management will conduct a comprehensive review to identify any missing training and expired staff certifications, including Occupational First Aid, FoodSafe, and Nonviolent Crisis Intervention (NVCi). This will be completed by March 31, 2025.

E.3.2 The Director of Gathering Place should ensure the staff certification renewal tracker is utilized by staff to facilitate timely training and certification renewals. The tracker should include monitoring of Occupational First Aid certifications, Foodsafe certifications, and completion and renewals of Nonviolent Crisis Intervention course. The tracker should be implemented by March 31, 2025.

Management Response:

Please check one:

☒ Agree with the findings

☐ Disagree with the findings

Please check one:

☒ Agree with the recommendations

☐ Disagree with the recommendations

Management Action Plan:

Gathering Place management will ensure the applicable staff certification renewal tracker is actively utilized to facilitate timely training and certification renewals. Tracker(s) will monitor Occupational First Aid, FoodSafe, and Nonviolent Crisis Intervention certifications, ensuring compliance and staff preparedness. Regular reviews will be conducted to maintain accuracy and support proactive renewal planning. Note: NVCi certification is tracked for all applicable ACCS employees, this tracking document is maintained by the Security and Prevention Manager supported by ACCS admin team members and retained in Van Docs for ease of access. A plan will be implemented to

ensure all required certifications are updated as soon as possible, with ongoing tracking to maintain compliance and staff readiness. This will be completed by March 31, 2025.

E.4 Re-train management on WorkSafeBC incident investigation reporting

In accordance with WorkSafeBC requirements, employers must promptly investigate any incidents resulting in an injury requiring medical treatment or one that had the potential to result in serious harm. WorkSafeBC also requires investigations to be conducted by employers, with a preliminary report completed within 48 hours of incident date and a full report within 30 days.

A review of the 31 incidents reported in the incident reporting system in 2023 revealed that 11 incidents did not meet the completion deadlines. From a sample review, we also noted four of the incident reports either did not contain sufficient details required by WorkSafeBC or were missing from the monthly Joint Occupational Health and Safety Committee meeting minutes.

The City provides a course on conducting incident investigations; however, not all management members responsible for these investigations have completed the training. It is important to ensure all incidents are investigated thoroughly, documented and discussed with the Joint Occupational Health and Safety Committee to ensure similar incidents do not occur in the future.

Recommendations:

E.4.1 The Director of Gathering Place should ensure all staff involved in WorkSafeBC investigations complete the City's "Incident Investigation" course through SuccessFactors, to ensure all documented investigations have sufficient detail. The course should be completed by June 30, 2025.

Management Response:

Please check one:

☒ Agree with the findings

☐ Disagree with the findings

Please check one:

☒ Agree with the recommendations

☐ Disagree with the recommendations

Management Action Plan:

Gathering Place management will ensure that all staff involved in WorkSafeBC investigations complete the City's "Incident Investigation" course through SuccessFactors. This training will enhance staff competency in conducting thorough investigations and ensure all documented reports contain sufficient detail to meet regulatory and organizational standards. A tracking system will be implemented to monitor course completion and compliance.

E.5 Update Occupational Health and Safety information

Members of the Joint Occupational Health and Safety Committee meet monthly to identify and help resolve health and safety issues in the workplace. These members' names are included in the Employee Safety Orientation Checklist so new employees know whom to contact with any safety concerns. However, four out of seven of the names listed are outdated.

Additionally, the City provides a checklist available to all departments called the "Official OH&S Notice Board Checklist" to ensure information posted on the health and safety board for employees is complete. Upon review of the notice board in the staff room, it was noted that six out of the 12

applicable items were missing. Missing items included the City's Occupational Health and Safety Policy and Emergency/Evacuation Procedures.

Recommendations:

E.5.1 The Director of Gathering Place should ensure the member list of the Joint Occupational Health and Safety Committee in the Employee Safety Orientation Checklist is updated. This list should be updated by March 31, 2025.

Management Response:

Please check one:

☒ Agree with the findings

☐ Disagree with the findings

Please check one:

☒ Agree with the recommendations

☐ Disagree with the recommendations

Management Action Plan:

Gathering Place management will ensure that the Employee Safety Orientation Checklist includes an up-to-date list of Joint Occupational Health and Safety Committee members. This will support staff awareness of committee representatives and reinforce access to workplace safety resources. Regular updates will be conducted to maintain accuracy.

E.5.2 The Director of Gathering Place should ensure the Occupational Health and Safety Board is complete with all items from the City's "Official OH&S Notice Board Checklist". There should also be one person designated to complete this checklist at least annually. This should be reviewed and implemented by March 31, 2025.

Management Response:

Please check one:

☒ Agree with the findings

☐ Disagree with the findings

Please check one:

☒ Agree with the recommendations

☐ Disagree with the recommendations

Management Action Plan:

Gathering Place management will ensure the Occupational Health & Safety Board is fully compliant with the City's "Official OH&S Notice Board Checklist." A designated staff member has been assigned to review and complete this checklist quarterly to maintain accuracy and compliance with safety requirements.

SITE SECURITY

E.6 Standardize and formalize training for Security staff

Security staff play a crucial role in the operations at Gathering Place as employees are often exposed to workplace violence incidents. During training of new daytime and nighttime shelter security staff, they are provided with a general site tour and security overview, but most of the training occurs during the first three working shifts which involves on-the-job shadowing with an experienced staff member.

As a new security employee, job shadowing for three shifts does not offer sufficient exposure and training to all potential incidents and may leave staff unprepared for expected protocols when working alone. This could put the safety of patrons, volunteers, and colleagues at risk.

s.15(1)

In addition to ensuring that adequate training is provided, WorkSafeBC regulations also mandate that all training provided to workers be documented in case of a future incident that may prompt a WorkSafeBC investigation. Therefore, management should develop a system for tracking training that has been completed by Security staff.

Recommendations:

E.6.1 s.15(1)
s.15(1)

Management Response:

Please check one:

☒ Agree with the findings

☐ Disagree with the findings

Please check one:

☒ Agree with the recommendations

☐ Disagree with the recommendations

Management Action Plan:

Gathering Place management will develop a formal training plan requiring all daytime and nighttime shelter security staff to complete a standardized security course. This will ensure consistency in knowledge, skills, and procedures across the security team.

In consultation with the NMHSO Managing Director and Director for Gathering Place, the Security and Violence Prevention Manager will support and coordinate the required training and ongoing development needs. We are currently exploring training options to ensure they align with operational requirements and best practices. A tracking system will be implemented to monitor completion and compliance.

E.6.2 The Director of Gathering Place should establish a system to track all training provided to security staff, including the names of courses completed and their corresponding dates. This tracker should be implemented by June 30, 2025.

Management Response:

Please check one:

☒ Agree with the findings

Please check one:

☒ Agree with the recommendations

☐ Disagree with the findings

☐ Disagree with the recommendations

Management Action Plan:

Gathering Place management will establish a system to track all training completed by security staff, including course names and corresponding dates. This system will ensure accurate record-keeping, support compliance with training requirements, and facilitate ongoing professional development. Regular reviews will be conducted to maintain up-to-date records and identify any training gaps.

E.7 Create a comprehensive Security Manual

It is essential for security personnel to have a detailed Security Manual that complements any training courses they receive. Topics should include (but are not limited to):

- Policies and procedures designed to mitigate the risk of violence against workers, and recognizing the possibility of such threats;
- Procedures for responding to incidents of verbal abuse, threats of violence, physical aggression, including guidelines for seeking assistance; and
- Procedures for reporting, investigating, and documenting incidents.

Currently, the security team uses a manual referred to as the Post Orders Manual. This binder contains information on safety protocols but contains numerous outdated security policies and job descriptions. This binder lacks complete and current security policies, making it challenging to navigate and use. As a result, it would be difficult for staff to use as a reliable reference for written policy guidance. This observation has also been noted by management who indicated that a more comprehensive security manual is being created to replace the current one.

Recommendations:

E.7.1 The Director of Gathering Place to ensure an updated and revised Security Manual is created and finalized. The new manual should ensure all policies and procedures relating to violence prevention are up-to-date, aligns with the Code of Conduct and other Social Operations Centres' policies and procedures, as appropriate. Once complete, this document should be placed in a location easily accessible to security staff. This manual should be developed and implemented by December 31, 2025.

Management Response:

Please check one:

☒ Agree with the findings

☐ Disagree with the findings

Please check one:

☒ Agree with the recommendations

☐ Disagree with the recommendations

Management Action Plan:

Given the critical need for comprehensive and up-to-date guidelines for security personnel, Gathering Place management acknowledges the current limitations of the Post Orders Manual. This existing binder, with its outdated policies and disorganized format, is insufficient to support security staff in their roles. It is essential that all security personnel have access to a detailed Security Manual that aligns with training courses and addresses key safety areas, including:

- *Policies and procedures to mitigate the risk of violence against workers and identify potential threats.*
- *Clear procedures for responding to incidents of verbal abuse, threats of violence, and physical aggression, including guidelines for seeking assistance.*

- *Procedures for reporting, investigating, and documenting incidents to ensure proper follow-up and accountability.*

To address this, the ACCS Manager of Security and Violence Prevention is actively working on developing a more comprehensive and structured Security Manual that will support the specificity required to integrate each center's unique operational requirements. The draft final form of the manual for all centres is anticipated to be completed and implemented by Q1 2025. This will provide security staff with a reliable, accessible resource for guidance on safety protocols and procedures. Moving forward, we will ensure regular updates to this manual to keep it aligned with evolving best practices and safety requirements.

E.8 Ensure Access Restriction guidelines from Code of Conduct is being adhered to

ACCS has a Code of Conduct and Access Restrictions Guideline that applies to all Social Operations' community spaces. This Code of Conduct outlines behaviour expectations and unacceptable behaviours that would result in restricting access or suspending services for a patron. Having an Access Restriction means the patron will not be allowed at a Social Operations location for a specified period of time.

We observed the following deviations from the Access Restriction guidelines:

- Application of the length of access bans amongst patrons have been inconsistent and may not follow the guidelines;
- Access restrictions given to patrons during daytime operations do not apply to nighttime shelter hours and vice versa; and
- Access restriction forms provided to patrons are shredded and not retained.

s.15(1)

Recommendations:

E.8.1 The Director of Gathering Place should ensure that the lengths of Access Restrictions issued to patrons aligns with the Social Operations' Code of Conduct. All exceptions to the guideline should be documented in Resolver along with an explanation. This should be implemented by March 31, 2025.

Management Response:

Please check one:

☒ Agree with the findings

☐ Disagree with the findings

Please check one:

☒ Agree with the recommendations

☐ Disagree with the recommendations

Management Action Plan:

Gathering Place management will ensure that the lengths of Access Restrictions issued to patrons are consistent with the Social Operations' Code of Conduct. Offense guidelines must be strictly adhered to when administering Access Restrictions.

The Access Restrictions and Code of Conduct Policy has been updated to reflect where an Access Restriction is determined to be shorter than the stated guidelines, particularly for serious offenses such as violence, threats, hate speech, or criminal harassment the Security & Violence Prevention

Manager must be consulted, and consensus among relevant parties must be reached. Additionally, the Managing Director will be informed of any exceptions to the access restriction guidelines, and their approval will be required for matters involving repeat offenses.

Management will continue to coordinate with Resolver leads on those areas of functionality that can be system supported to track all Access Restrictions across all centres.

E.8.2 The Director of Gathering Place should ensure Access Restrictions issued to patrons are applied to both daytime and nighttime shelter services consistently. This should be completed by March 31, 2025.

Management Response:

Please check one:

☒ Agree with the findings

☐ Disagree with the findings

Please check one:

☒ Agree with the recommendations

☐ Disagree with the recommendations

Management Action Plan:

Gathering Place management will ensure that Access Restrictions issued to patrons are applied consistently across both daytime and nighttime shelter services. This will ensure uniformity in the enforcement of access policies, providing clear guidelines for staff and maintaining a consistent approach to patron management across all service hours.

E.8.3 s.15(1)

Management Response:

Please check one:

☒ Agree with the findings

☐ Disagree with the findings

Please check one:

☒ Agree with the recommendations

☐ Disagree with the recommendations

Management Action Plan:

s.15(1)

E.8.4 The Director of Gathering Place should develop a process to retain copies of all Access Restriction forms issued to patrons in a central location (e.g. Director or Security Coordinator's office) for a minimum designated time period. This process should be implemented by March 31, 2025.

Management Response:

Please check one:

☒ Agree with the findings

☐ Disagree with the findings

Please check one:

☒ Agree with the recommendations

☐ Disagree with the recommendations

Management Action Plan:

Gathering Place management will develop a process to retain copies of all Access Restriction forms issued to patrons in a centralized location, accessible to staff. These records will be securely retained for a period of seven years, ensuring compliance with documentation policies and facilitating easy access for review and reporting when necessary.

E.9 Ensure job descriptions for all staff are updated

In addition to ensuring safety, a key responsibility of all security staff is to possess knowledge of social programs and be able to direct patrons to the appropriate resources for their needs. While this responsibility is outlined in the job descriptions for security attendants, it is missing from the descriptions for both daytime and shelter security supervisors and coordinators despite being part of their duties.

Staff have also indicated that the job descriptions for Kitchen and Health Centre positions are also outdated and no longer reflect current expectations as they have not been revised for years.

It is important to review job descriptions to ensure they accurately reflect the expected roles of staff as these descriptions inform employees their responsibilities. Updating job descriptions is also important to accurately reflect the required skills and qualifications to improve hiring efficiency. This review should be completed for all positions.

Recommendations:

E.9.1 The Director of Gathering Place to ensure job descriptions are revised to reflect actual roles and responsibilities. This includes and is not limited to Daytime Supervisor, Daytime Coordinator, Shelter Supervisor, Shelter Coordinator, and Kitchen and Health Centre positions. The job descriptions should be updated by June 30, 2025.

Management Response:

Please check one:

☒ Agree with the findings

☐ Disagree with the findings

Please check one:

☒ Agree with the recommendations

☐ Disagree with the recommendations

Management Action Plan:

Gathering Place management will ensure that job descriptions and class specs are revised to accurately reflect the actual roles and responsibilities of all staff, including Daytime Supervisor, Daytime Coordinator, Shelter Supervisor, Shelter Coordinator, Kitchen and Health Centre positions.

This process will ensure that job descriptions align with current expectations, clearly communicate responsibilities to staff and applicants, as well as reflect the required skills and qualifications for each role. The revised descriptions will also support more efficient hiring and workforce planning.

LEGAL OBLIGATIONS

E.10 Designate staff to ensure contractual legal obligations are fulfilled

At the time of this audit, there were four active contracts between Gathering Place and other organizations. This included BC Housing to provide shelter and hygiene services to patrons and s.15(1) for food distribution. In reviewing one of these contracts, it was noted

that five out of the 12 obligations were either not fulfilled, not fulfilled in a timely manner, or were partially fulfilled. These exceptions include requirements such as not submitting a proposed budget and the annual statement of operations within the stated timeline.

Management indicated that there is one staff member who is responsible for tracking these obligations and ensuring they are fulfilled, but the position has been vacant since early 2024.

Recommendations:

E.10.1 The Director of Gathering Place to ensure there is a person responsible for tracking legal obligations and there is a system to track all contract legal obligations and deadlines to ensure all obligations are met. This should be in place by March 31, 2025.

Management Response:

Please check one:

☒ Agree with the findings

☐ Disagree with the findings

Please check one:

☒ Agree with the recommendations

☐ Disagree with the recommendations

Management Action Plan:

Gathering Place management will ensure that there is a designated person responsible for tracking all legal obligations related to contracts. A system will be implemented to track all contractual legal obligations and deadlines, ensuring that each obligation is met in a timely manner. This system will provide clear oversight and accountability, helping to prevent lapses and ensuring that all contractual requirements are fulfilled consistently. The designated staff member will be empowered with the tools and support needed to maintain this system and address any potential delays proactively.

E.11 Ensure proper classification of contractors and vendors

Gathering Place employs approximately 12 programming instructors who teach specialized programs. These instructors are hired as contractors and invoice the City for their services. It is important to establish clear criteria for classifying these instructors—whether as vendors, contractors, temporary staff or auxiliary staff—to ensure consistent and appropriate treatment. There was no documentation available to verify the types of agreement signed and retained for contractor relationships. It is important to ensure all contractor agreements should be documented, signed and retained in accordance with the relevant City policies.

s.15(1)(l)

. A review should be conducted to assess whether the nature of their work requires the City to classify them employees or contractors as per CRA guidelines.

Recommendations:

E.11.1 The Director of Gathering Place to consult with appropriate departments to ensure the programming instructors and Shelter Peers are properly classified as employees or

contractors. For contractors, there should also be appropriate agreements drafted, signed and retained. This should be created by June 30, 2025.

Management Response:

Please check one:

☒ Agree with the findings

☐ Disagree with the findings

Please check one:

☒ Agree with the recommendations

☐ Disagree with the recommendations

Management Action Plan:

Gathering Place management will consult with the appropriate departments, including Supply Chain Management, and Legal where required, to ensure that programming instructors and Shelter Peers are properly classified as employees or contractors in accordance with relevant regulations. For those classified as contractors, appropriate agreements will be drafted, signed, and retained in compliance with City policies. We will also work closely with Supply Chain Management leads to coordinate and manage contracts with contractors as required, ensuring all processes are aligned and compliant with organizational standards.

CASH HANDLING

E.12 Adhere to the City's Cash Handling Manual

Create training program for cashiers

Training cashiers in cash handling is crucial to ensure transactions are entered accurately, and cash on-hand is adequately safeguarded. Well-trained cashiers promote greater accountability and helps minimize discrepancies.

There is currently no cashier training manual in place and the City's Cash Handling Manual is not used. Although cash transactions at Gathering Place are low-value, it is important to maintain accountability for cash receipts.

During our review of cash handling procedures, we identified several areas of non-compliance with the City's Cash Handling manual, specifically around deposit preparation. Management acknowledged this issue and stated that the Gathering Place Head Cashier has started developing a cashier training manual training sessions to ensure consistency among cashiers. However, it is important that the procedures and training are consistent with the City's Revenue Services cash-handling policies.

Recommendations:

E.12.1 The Director of Gathering Place should consult with the Revenue Services department about providing a formal cash handling training session for all new and current cashiers to ensure consistency with the City's Cash Handling policies and procedures. The content should be reviewed and approved by the City's Revenue Services team. This should be completed by December 31, 2025.

Management Response:

Please check one:

☒ Agree with the findings

☐ Disagree with the findings

Please check one:

☒ Agree with the recommendations

☐ Disagree with the recommendations

Management Action Plan:

Gathering Place management will consult with the Revenue Services department to arrange a formal cash handling training session for all new and current cashiers. This training will be designed to ensure consistency with the City's Cash Handling policies and procedures. The content of the training program will be reviewed and approved by the City's Revenue Services team to ensure it aligns with their standards and requirements. This collaborative approach will ensure that cashiers are fully equipped to handle transactions accurately and securely, promoting consistency and accountability across all cash-handling operations.

E.12.2 The Director of Gathering Place should ensure the Head Cashier applies and follows the City's Cash Handling Manual's policies and procedures. This should be completed by June 30, 2025.

Management Response:

Please check one:

☒ Agree with the findings

☐ Disagree with the findings

Please check one:

☒ Agree with the recommendations

☐ Disagree with the recommendations

Management Action Plan:

Gathering Place management will ensure that the Head Cashier applies and follows the City's Cash Handling Manual's policies and procedures. This will include ensuring that all cash handling processes, from transaction entry to deposit preparation, are in strict adherence to the established guidelines. Regular reviews and oversight will be implemented to ensure compliance and address any discrepancies promptly, ensuring a consistent and accountable approach to cash management at Gathering Place.

E.13 Strengthen controls around tracking and access of cash and other assets

s.15(1)(l)

s.15(1)(l)

Recommendations:

E.13.1 The Director of Gathering Place should maintain a list of authorized employees with access to each safe's combinations, along with the date of the most recent combination change and ensure this information is kept up-to-date. This should be posted by March 31, 2025.

Management Response:

Please check one:

- ☒ Agree with the findings
☐ Disagree with the findings

Please check one:

- ☒ Agree with the recommendations
☐ Disagree with the recommendations

Management Action Plan:

s.15(1)(l)

We will take necessary steps to ensure this information is consistently updated and maintained. This process will ensure adherence to best practices for security, accountability, and compliance with the City's Cash Handling policies.

E.13.2 The Director of Gathering Place should ensure restricted access for master keys and maintain a list of staff who have access. This should be completed by June 30, 2025.**Management Response:**

Please check one:

- ☒ Agree with the findings
☐ Disagree with the findings

Please check one:

- ☒ Agree with the recommendations
☐ Disagree with the recommendations

Management Action Plan:

s.15(1)(l)

Additionally, procedures will be implemented to ensure that the key boxes are securely closed and locked at all times. These procedural measures will be put in place promptly to enhance security and ensure proper tracking and safeguarding of community centre keys.

OTHER OBSERVATIONS**E.14 Consider implementing security staff uniforms**

It was observed that site security staff were not wearing uniforms at Gathering Place. The only distinction between staff and patrons were City staff badges worn on lanyards. The absence of uniforms or any visible differentiation makes it challenging for patrons to identify security personnel when assistance is needed. Uniforms are essential for helping patrons easily identify security staff, which enhances safety and trust by clearly indicating who to approach for assistance.

Recommendations:**E.14.1 The Director of Gathering Place should consider requiring uniforms for security staff. This should be in place by June 30, 2025.****Management Response:**

Please check one:

- ☒ Agree with the findings
☐ Disagree with the findings

Please check one:

- ☒ Agree with the recommendations
☐ Disagree with the recommendations

Management Action Plan:

The integration of uniforms for Gathering Place security staff is underway, with close consultation to ensure staff input is considered and expectations are clearly communicated. This process will support staff buy-in and foster a sense of ownership in the uniform adoption. We are working to ensure all staff understand how their uniform contributes to organizational alignment, security, and creating a clear point of contact for patrons.

In addition, we have developed a comprehensive Uniform and Dress Code policy, which outlines expectations for all security personnel. This policy will provide clear guidelines on the appropriate wear and maintenance of uniforms, ensuring consistency across all staff members. The uniform rollout is expected to be completed by Q1, 2025, and we are confident that this initiative will enhance both security and the overall experience for our patrons.

DISTRIBUTION

To:	Margaret Wittgens – General Manager, Arts, Culture and Community Services Magnus Enfeldt – Chief Safety Officer Jody Bourgeau – Managing Director, Social Development Dallas Gonsalves – Director, Gathering Place
CC:	Audit Committee