



CITY OF VANCOUVER INTERNAL AUDIT REPORT COVID-19 Compliance Audit

Distribution:

Audit Committee
City Leadership Team
KPMG

Laurence Beatch – Director, Organizational Health & Safety
Simon Goldsmith – Director, Organizational Development & Strategic Initiatives
Dennis Leung – Associate Director, Facilities Maintenance & Operations

EXECUTIVE SUMMARY

July 16, 2021

The City's pandemic response required the implementation of various new policies and procedures within a short time frame to mitigate the risk of exposure to the COVID-19 virus and to ensure that City services and facilities could continue to operate safely for the public and staff.

There are adequate processes in place to ensure that the City's COVID-19 safety measures comply with provincial health orders. Worksites were found to be generally compliant with established City policies and procedures. However, improvement in processes related to staff health checks and records retained of sanitization completed at City facilities is needed to ensure compliance going forward. Additionally, management has committed to enhance processes supporting safety for staff working home alone and to monitor for completion of Remote Workbook agreements.

The more significant findings and recommendations are:

E.1 Standardize departmental health check processes and associated records

To ensure compliance with daily health check requirements, additional guidance should be provided to departments as to the detail required to be retained and the related retention period.

E.2 Maintain clear records of sanitization performed at facilities

Worksites should maintain records of the sanitizing performed to ensure compliance with guidelines in place that require high touch points to be sanitized twice daily.

E.3 Enhance procedures to support safety for staff working remotely

For remote workers working alone, a check-in process should be followed. A technology-based solution may streamline this process and help facilitate compliance with this requirement.

E.4 Ensure compliance with Remote Work Workbook requirements

As the City moves toward a longer term flexible work model, completion and sign-off on the City's remote work policy should be overseen.

Tony Hui, CPA, CA, CRMA
Chief of Internal Audit

Carmen Fuellbrandt, CPA, CMA, CIA, CRMA
Manager, Internal Audit

A. BACKGROUND

City policies and guidelines established to address COVID-19 safety

Since the onset of the COVID-19 pandemic, and in alignment with provincial public health orders, the City has implemented numerous controls and procedures to mitigate the risk of exposure to COVID-19 for staff and citizens at City facilities and workspaces. During the second half of 2020, departments submitted an approved departmental restart safety plan prior to recommencing operations.

Also in response to COVID-19, staff who could work from home were encouraged to do so which enabled physical distancing and limited interactions between employees. Guidelines were established to support remote staff and their managers by addressing safety and ergonomic requirements, as well as the other unique aspects of a remote work model.

Changing COVID-19 related restrictions in B.C.

During the time of this audit, the Province of B.C. progressed from Step 1 to Step 2 of its restart plan. The restrictions in place for both of these steps included a requirement for employers to have a COVID-19 Safety Plan and a daily health check process in place for staff. Capacity limits, physical distancing, and mask-wearing requirements were also mandated by public health order.

Most recently, as of July 1, 2021, the Province of B.C. has moved to Step 3 of its restart plan, given the declining case counts and hospitalizations. This has meant the lifting of many of the public health orders and removal of many of the restrictions. However, COVID-19 variants continue to circulate throughout the world and at some point may necessitate a return to more restrictive public health orders and safety measures.

B. SCOPE

The audit objective was to provide reasonable independent assurance that the City's established COVID-19 safety measures are complied with and that the related internal controls and business processes are adequate and effective. The audit also helps position the City to manage any future responses required by the COVID-19 pandemic or other similar emergencies.

This audit assessed the adequacy of and compliance with the City's policies, processes, and communicated guidelines with respect to changes in the City's operations supporting COVID-19 safety protocols. City facilities that remain operational with staff working on-site as well as those where staff have shifted to a remote work model were included in scope.

The scope of the audit included:

- Assessment of the current protocol and processes to ensure the evolving Provincial Health Orders related to the COVID-19 pandemic are being adhered to;

- Review of a sample of departmental COVID safety plans and testing of compliance to established COVID-19 safety measures at various City sites and departments; and
- Review of current City policies and practices in place to ensure around security of confidential information and staff safety with respect to remote work.

COVID-19 safety measures were reviewed at multiple worksites that covered the following departments: Vancouver Fire and Rescue Services, Engineering Services, Parks and Recreation, City Manager's Office, Vancouver Police Department, Finance Risk and Supply Chain Management, Vancouver Public Library, and Development, Buildings & Licensing.

A survey of staff located at the worksites reviewed was also conducted. The objective was to solicit feedback from a wider range of staff and to identify potential areas where further support is needed to ensure adherence to public health orders related to COVID-19. Of the sites reviewed, a total of 189 managers and staff were invited to complete the survey via email; 59 responses were received. Refer to Appendix A for a summary of the survey results.

C. CONCLUSION

There are adequate processes in place to ensure that the City's COVID-19 safety measures comply with provincial health orders. Worksites were found to be generally compliant with established City policies and procedures. However, improvement in processes related to staff health checks and records retained of sanitization completed at City facilities is needed to ensure compliance going forward. Additionally, management has committed to enhance processes supporting safety for staff working home alone and to monitor for completion of Remote Workbook agreements.

Implementing these changes will support the City's efforts in effectively managing risk and ensuring compliance in the event of additional COVID-19 related restrictions or other similar health emergencies that may arise.

Findings and recommendations have been discussed with appropriate management and responses incorporated in this report.

D. RISK ANALYSIS

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

- COVID-19 exposure to staff or users of City facilities resulting in illness;
- Non-compliance with public health orders relating to COVID-19, which could result in closure of City facilities;
- COVID-19 exposures not communicated to the appropriate people in a timely manner increases the risk of a virus outbreak;
- Inadequate cleaning thereby increasing the risk of COVID-19 virus being transmitted;
- Confidential and sensitive information accessed in a remote work environment may not be secure;
- Safety risk to staff working from home alone or working from a location outside of BC that may have Worksafe coverage implications;
- Staff working from home may not have optimal ergonomic equipment, leading to health and safety issues.

E. AUDIT ISSUES, RECOMMENDATIONS AND MANAGEMENT RESPONSES

E.1 Standardize departmental health check processes and associated records

Daily health check self-assessment processes in place

Staff in departments across the City have been required to complete a health check self-assessment prior to arriving to a City work site. This is in line with the requirements for employers under the province's COVID Restart Plan that was in effect at the time of the audit.

Management confirmed that a health check process was in place and being followed for all sites reviewed. Additionally, all staff that responded to Internal Audit's survey questions affirmed that they conduct daily health checks.

Inconsistent record-keeping across departments

The records evidencing the daily health checks varied across departments. Some departments maintained records containing the employees' names and sign offs on having completed the checks, or an email confirming that a check was completed and passed. Other departments retain a list of names, without staff sign-off, and others did not maintain any records of which staff had completed the checks. Records did not always clearly indicate whether employees passed the health screening.

The need for accountability for completing health checks should be balanced with the need to limit health related information that is retained. Management in OH&S confirmed that a record of completed health check is not a Worksafe requirement. However, it is required that the City demonstrate that a process is in place.

It was noted that one department had implemented a text message-based daily check in process, which enhanced efficiency of these daily checks. This system could be explored to be expanded to other City departments, where suitable given their staff's access to phones and PC's.

Recommendations:

E.1.1 The Director, Organizational Health & Safety, should determine the level of detail required in health check records and the retention period for related records and clarify this in a reminder to all groups, including those responsible for safety and COVID-related protocols within VPD and VPL, in the event that the daily health check requirement is reinstated. The key requirements should also be verbally cascaded within each department, in addition to the normal messaging issued by Organizational Health & Safety.

E.1.2 The Director, Organizational Health & Safety should review the text messaging tool developed for health checks and consider whether this could be made available as an optional tool for other City departments in the event that the daily health check requirements are reinstated.

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:

Public Health issued a verbal order related to health checks on the weekend effective midnight the day issued. Initial verbal and posted instructions required record keeping. As this was initially an expectation of Public Health, our messaging detailed this requirement. Retention of documentation requirements were not provided in the Order or messaging; however it was clear Public Health and / or WorkSafeBC may follow up with organizations to ensure employers were following a reasonable process to achieve the intent of the order.

It was recognized that one approach would not fit all City operations, as there are many differing ways City employees report to work and conduct their work. These include but are not limited to:

- reporting in the field at street or other public facing operations;*
- working in the field as inspectors;*
- working at and / or reporting to works yards;*
- reporting to a vehicle and / or starting work from home in a City vehicle;*
- reporting to an office; and*
- daily varying reporting requirements and varying work starting locations.*

Many employees do not have access to a City phone or City Email, may not wish to use their personal phone, and do not have a daily or regular in person check with their supervisor.

Considering the above, multiple approaches that achieved the often-changing requirements were required.

Initial and going messaging and requirements were issued by Organizational Health and Safety. It is recognized that operations on occasion did not read updated messaging and requirements and followed previously messaged processes. These were addressed when known. Additionally, regular reminders of requirements were messaged. Approaches included City Manager Updates, Crew talks, EOC Director Forums, City Insider, Citywire, etc.

The City designed and made an available and electronic tool that worked on personal and City phones and computers. The tool was updated regularly to address changing health check questions, and changing privacy and record keeping requirements. The availability of the tool was messaged organizationally.

If there is a future requirement for health checks, clear requirements for the health check and retention periods will be communicated to the City and shared with VPD and VPL as they are separate employers. Additionally, we would engage with IT regarding optional tools that may assist with any Order given. While we provided an optional record keeping tool, in the event of future requirements, we would consider what record keeping tool or tools should be used.

E.2 Maintain clear records of sanitization performed at facilities

The City has established cleaning protocols that set out the standards for janitorial services, instructions for cleaning of individual workstations, vehicle and tool cleaning, and site-specific disinfection. The Level 1 COVID-19 Janitorial and Instruction standard requires high frequency touch points to be disinfected at least twice per day in addition to the regular scheduled cleaning of a facility.

Evidence of daily sanitization not always retained

Review of the sanitization records for 16 sites revealed the following:

- For five sites, records of sanitization were completed, although the specific location of the facility was not noted.
- For six sites, sanitizing records are retained, however they appeared incomplete or not signed off by the staff scheduled to perform the cleaning.
- For the remaining five sites, there are no records kept of sanitizing performed.

Responsibility for janitorial services varies among City sites and is either handled by REFM or Park Board staff, and for some buildings is contracted out to a third party provider.

REFM has developed a template that is used to record sanitizing tours for the facilities where their staff is responsible for the janitorial services. There is an opportunity to extend this procedure to other sites that are managed by different staff groups.

Posting clear records of the sanitization performed creates accountability for these requirements and also serves as a record that can be made easily visible to staff and visitors assuring them of the care taken to maintain cleanliness at City facilities.

Recommendation:

E.2.1 The Associate Director, Facilities Maintenance & Operations should communicate the City’s approach to record keeping of sanitization and ensure that all facilities have a copy of the template and are encouraged to establish similar record keeping. The Occupational Health & Safety team should be engaged to ensure that the communication is incorporated into other COVID-related safety materials. This should be completed by October 31, 2021.

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:

E.3 Enhance procedures to support safety for staff working remotely

Reference material for remote workers at the City refers to the requirement for remote workers who are working alone to check in with their manager on a daily basis. This is a Worksafe BC requirement due to the inherent safety risk of working alone. The City’s COVID Remote Work Workbook requires staff to sign off on the statement, “On the days you’re working alone, you agree to check in with your Manager via email at the start and end of your work day.”

Efficient check-in method should be established

For a sample of 30 employees who indicated “Yes” to working alone remotely in their Remote Work Workbook, the check-in/out process was confirmed with the employee’s manager. Twenty-

three responses were received, with eight managers confirming that the email check-in process was not complied with:

- Two of the 23 managers indicated that no check-in/out was being performed;
- Another two managers indicated that only a check-in was performed; and
- Four managers indicated that an informal process was used via daily work communications.

Various methods for checking-in/out are used by managers including email, text, Jabber, Outlook calendar, Doodle, virtual meetings. Records for checking-in/out may not be retained depending on the method. For example, the Jabber tool does not retain a message history unlike an email message.

Guidance needed on handling emergencies during remote work

Emergency contact information is also submitted via the Remote Work Workbook for reference in the event that the remote worker working alone has not checked in and managers need to confirm their well-being. Remote work reference material does not specifically address how emergencies witnessed remotely or resulting from no check-out by remote staff working alone should be handled. For example, if a staff member on a video conference was involved in a health emergency, other staff members may benefit from access to emergency contact information as well as clear guidance on when to call the employee's supervisor and emergency assistance.

Management in Organizational Health and Safety have indicated they are investigating available technologies with the aim of developing a tool that can be rolled out to support the safety of staff working alone remotely.

Recommendations:

E.3.1 The Director, Organizational Health & Safety should reiterate to staff and managers the importance of check-ins when working alone remotely and highlight the existing tools available for use. This should be completed by September 30, 2021.

E.3.2 The Director, Organizational Health & Safety should continue to pursue a workable technology-based solution to aid with formalizing and standardizing the check-in process for remote staff working alone at home. This should be implemented by January 31, 2022.

E.3.3 The Director, Organizational Health & Safety should establish guidelines for staff on handling emergencies in a remote work environment. This should include guidance on how to address time sensitive health-related emergencies for remote workers. This should be completed by September 30, 2021.

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:

Agree with the findings and recommendations.

IT has indicated they can build an internal solution with the time needed to deliver the solution being approximately 6 months. An internal cost effective solution is the long-term preferred approach. The ability to deliver on an internal technology-based solution to aid with formalizing and standardizing the check-in process for remote staff working alone at home by January 31, 2022 will be based on IT being able to deliver the solution with timing to enable rollout to the organization.

For the interim, we will re-message the importance of check-ins when working alone remotely and highlight the importance of operations having a process in place for their operations. We will also highlight the safety supplement to the remote workbook that speaks to working alone and emergencies.

E.4 Ensure compliance with Remote Work Workbook requirements

The City's Remote Work Workbook, which staff are required to fill out and submit to their manager, establishes guidelines for remote work and addresses various aspects of working remotely including safety, technology, equipment and materials requirements.

Remote work workbook not always completed

Staff working remotely are required to connect to the City network through a VPN connection. Review of VPN information for May and June 2021 revealed that 43% of VPN users had not completed a Remote Work Workbook.

To complete the Remote Work Workbook, staff are required to respond to several questions affirming their compliance with requirements for remote access, records management, wireless internet network, technology usage, and logout procedures. Managers are expected to follow-up with staff who had responded with "No" to these questions.

Follow-up needed to ensure remote work requirements met

Of the 2,047 Remote Work Workbooks completed, there were 905, or roughly 44%, that contained at least one "No" response to the questions indicating non-compliance with one of the requirements. There are no records available indicating the monitoring undertaken or whether follow-up has taken place to address the non-compliance items.

Recommendations:

E.4.1 The Director, Organizational Development & Strategic Initiatives should ensure that messaging to City managers regarding the Flexible Work Program emphasizes the importance of ensuring completeness of the Remote Work Workbook and managers' responsibility for ensuring this document is completed by their staff. Additionally, a process for spot-checking and analysis of completion statistics should be established to identify non-compliance areas for further support and reminders. This should be completed by September 30, 2021.

E.4.2 The Director, Organizational Development & Strategic Initiatives should provide guidance to City managers that addresses situations of non-compliance items as reported through the Remote Work Workbook. This should be in place by September 30, 2021.

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:

As the Flexible Work Program is rolled out across this City this fall, the requirement for a completed Remote Work Workbook and for compliance with requirements outlined within those workbooks will be reinforced with both managers and employees (who are working remotely) in a variety of ways:

- *Requirements and accountabilities built into program documentation and checklists*
- *Regular reminders through program communications and City Manager updates*
- *Where necessary, direct reminders focused on specific departments or work groups where compliance levels may be low*
- *Annual reminders to review remote work arrangements to determine if any changes have occurred that require the workbook to be updated.*

In addition to these communication efforts, throughout the fall and on an ongoing basis, HR will regularly review data on the number of workbooks that have been completed and compare that to VPN usage across the organization. In areas where it is apparent that workbook completion rates are low, targeted following with those departments will occur.

E.5 Establish a process to verify compliance with in-province remote work policy

Policy in place requiring in-province remote work

In early December 2020, the City's policy requiring remote workers to be located within the province of B.C. was reiterated to staff via email communication and internal webpage updates. Since then, and going forward as part of the Flexible Work Program being developed, the policy has been clarified to require remote workers to be within a daily commutable distance to the office. Requests to work within B.C. outside of the Lower Mainland require additional approvals and remote work outside of the province is not permitted. It was noted that the Remote Work Workbook does not include a section that specifically outlines the policy relating to working within B.C.

Effective monitoring process not yet in place

There is no monitoring process in place to verify the level of compliance with the in-province work requirement. Managers are responsible for ensuring that their staff are working within B.C. when working remotely. Non-compliance can have implications regarding Worksafe insurance coverage.

While it is difficult to verify the physical location of remote staff, VPN data can provide some insight. Discussions with staff in Technology Services indicated that different VPN locations may be a result of Internet Service Provider routing locations to different provinces, which may account for some of the VPN users appearing outside of B.C.

A sample of 15 VPN users that appeared to be out-of-province was taken for further review and follow-up with the user's supervisor. Of the 11 responses received, supervisors confirmed that nine of the users were staff working in B.C., and two users were contractors.

Recommendations:

E.5.1 The Director, Organizational Development & Strategic Initiatives should ensure that the City's Remote Work Workbook is updated to specify the policy related to in-province remote work and facilitate staff sign-off on this policy. This should be completed by September 30, 2021.

E.5.2 The Director, Organizational Development & Strategic Initiatives, in consultation with Technology Services, should establish monitoring for out of province remote work to identify any potential exceptions to City policy and follow-up with managers to verify work location. This should be completed by September 30, 2021.

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:

Efforts are already underway to address both of these recommendations.

Further information will be included in the Flexible Work Program documentation and the Remote Work Workbook reinforcing the requirement related to in-province, commutable distance remote work locations. As well, this has been further communicated in a recent City Manager's update and will continue to be reinforced with regular program communication.

HR is currently working with TS to establish a process for regularly reviewing VPN data to determine if any employees are regularly working outside of the province. In instances where non-compliance is identified, targeted follow up with managers will occur.

E.6 Address risks around information security and records management for remote work

Remote work brings unique challenges with respect to information security and records management. The Remote Work Workbook that was rolled out during the pandemic addresses some of staff's responsibilities in this regard.

Current remote workbook wording includes the provision that "The employee agrees to secure, protect, and manage information in accordance with the City of Vancouver's record management guidelines" and that "The Employee is responsible for securing and protecting the property, documents, and information belonging to the Employer."

While there is reference to the appropriate guidelines, there currently is no specific wording that addresses whether printing documents while working remotely is permitted, or acceptable use of storage devices such as USB drives and flash sticks.

With the development of the Flexible Work Program there is an opportunity to enhance the guidance and create specific guidelines and training that address some of the specific policies and practices that mitigate against some of the inherent information security risks associated with remote work.

Recommendation:

E.6.1 The Director, Organizational Development & Strategic Initiatives, in consultation with Technology Services, should incorporate additional guidance with respect to information security and records management into the Remote Workbook and related training materials for staff's reference. This should be completed by September 30, 2021.

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:

Work is underway to address this recommendation.

F. OTHER OBSERVATIONS

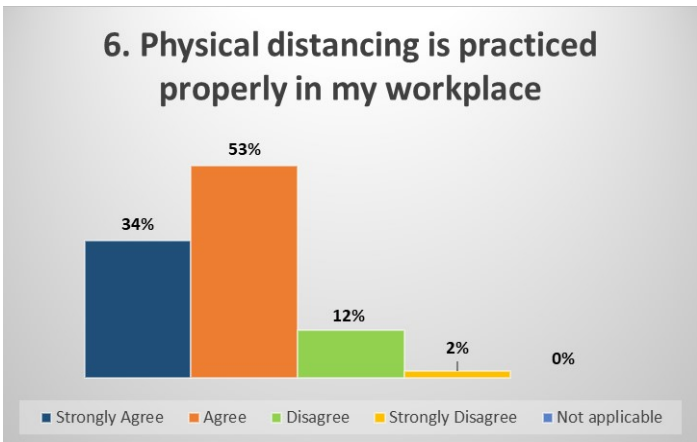
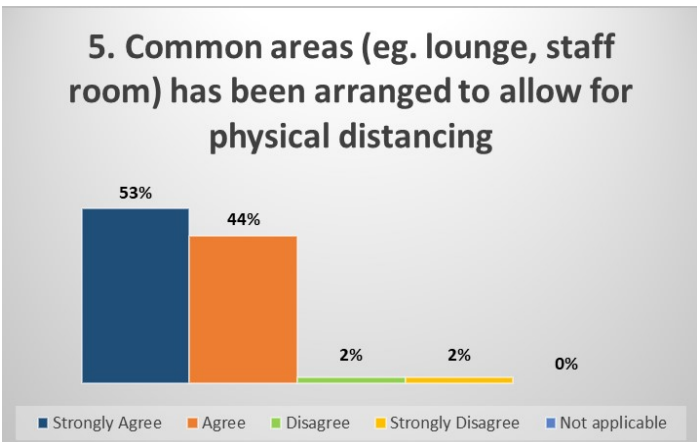
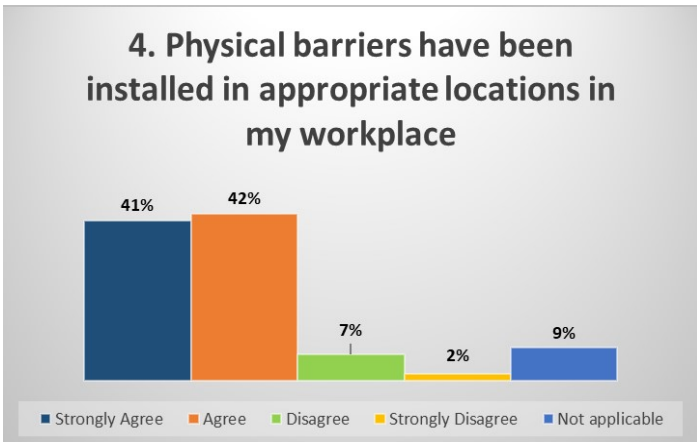
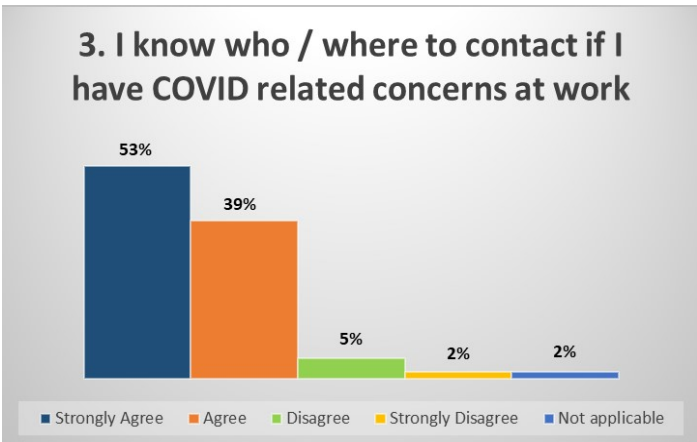
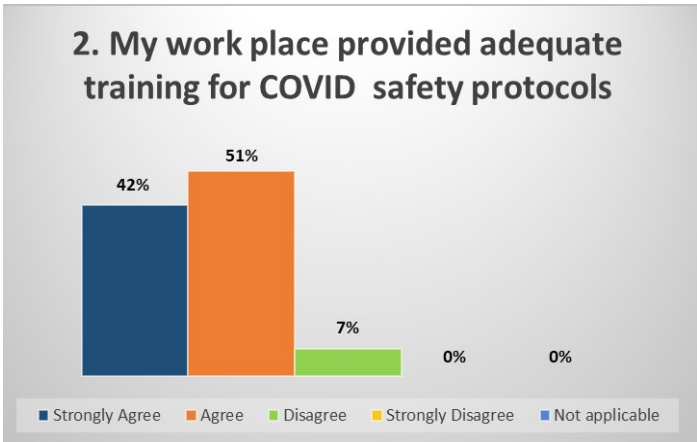
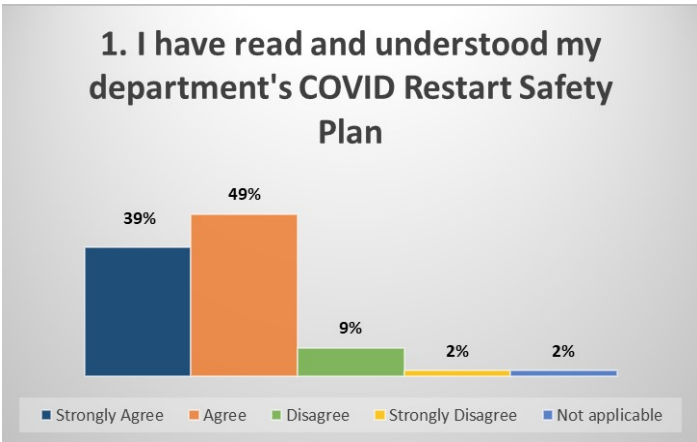
F.1 City's response to changing COVID-related restrictions and health orders

Subsequent to completion of audit fieldwork in July 2021, new public health orders were issued regarding COVID-19 safety measures. The City has provided timely updates to staff through various communications channels to ensure that they are informed of these changes and any potential impact to City operations.

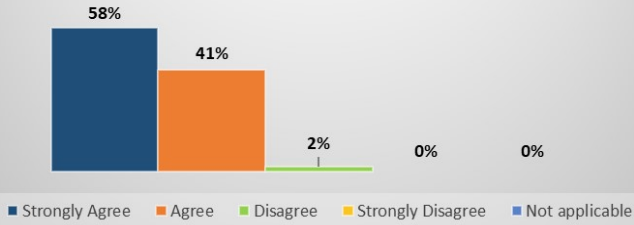
With the announcement of the BC Vaccine Card, the City is currently evaluating requirements of the program and will ensure appropriate procedures are in place to respond to program updates in a timely manner.

Appendix A: Summary of Survey Results – Internal Audit COVID-19 Safety Protocols Survey

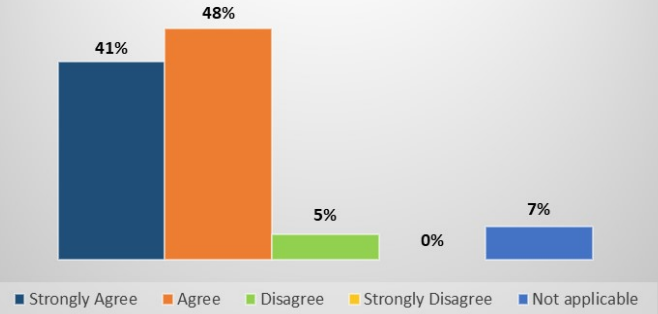
An email survey was sent to 189 managers and staff at various City worksites. A total of 59 (31%) responses were received. A majority of responses received indicated a high degree of compliance with COVID-19 safety protocols in place at worksites.



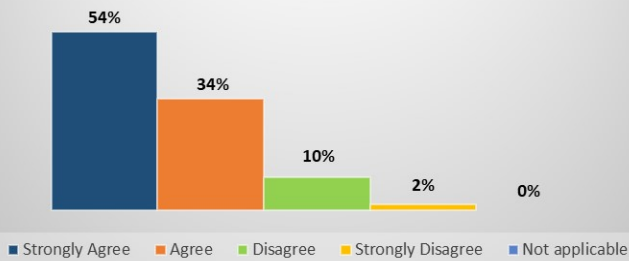
7. Masks are worn in my workplace when physical distancing is not possible



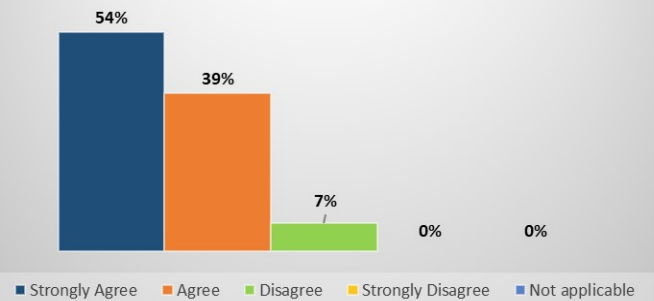
8. Used PPE is discarded appropriately at my workplace



9. Hand sanitizer stations are placed near entrance doors and high touch locations at my workplace



10. Work site surfaces are adequately cleaned



11. Cleaning agents and materials are adequately provided to staff to clean work site surfaces

