

Audit of the Mother-Child Program

May 8, 2025



Correctional Service
Canada

Service correctionnel
Canada

Canada 

© His Majesty the King in Right of Canada, as represented
by the Correctional Service of Canada, 2024

Catalogue Number PS84-254/2025E-PDF

ISBN 978-0-660-78238-6

Table of Contents

Pages

5-6

Background

Page

8

Audit Objectives,
Scope and
Approach

Pages

10-21

Audit Findings

Page

23

Audit Conclusion

Pages

25-26

Recommendations
and Management
Response

Pages

28-32

Annexes A - D

Background

Mother-Child Program

Creation of the Mother-Child Program

Following the Correctional Service Canada (CSC) release of *Creating Choices: The Report of the Task Force on Federally Sentenced Women (1990)*, which included a recommendation that new facilities must provide a home-like environment and sufficient flexibility to enable a child(ren) to live with their mother; the Mother-Child Program (MCP) started as a pilot project at Okimaw Ohci Healing Lodge (OOHL) in 1996.

In 2001, the Program expanded to being offered at all five women's institutions and OOHL (Annex B).

Objective of the Mother-Child Program

The objective of the Program is to foster positive relationships between federally incarcerated mothers and their child(ren), by keeping them together where appropriate, and providing a supportive environment that promotes stability and continuity for the mother-child relationship.

The audit of the MCP links to the CSC priority of "Safety and security of the public, victims, staff and offenders in institutions and in the community", as well as the priority of "Effective, culturally appropriate interventions and reintegration support for First Nations, Métis and Inuit offenders".

Establishment of Commissioner's Directive 768

In 2001, the Women Offender Sector (WOS) developed Commissioner's Directive (CD) 768 – Institutional Mother-Child Program to provide guidance to implement, maintain and monitor the institutional MCP. CD 768 defines the roles and responsibilities of staff and the eligibility requirements for participation in the Program. CD 768 was most recently updated in 2020.

Office of the Correctional Investigator Report and Mandate Letter

The 49th Annual Report of the Correctional Investigator 2021-2022 published findings and recommendations on the MCP which identified several areas of concern, including: strict program requirements and eligibility criteria; and the lack of collection, tracking and reporting on the Program.

In 2022, the Minister of Public Safety issued the Commissioner's Mandate Letter, which states that the Commissioner is expected to expand promotion for, participation in, and resourcing of the MCP in women's facilities.

In response to the mandate letter and the Office of the Correctional Investigator (OCI) recommendations, WOS is currently reviewing the MCP and taking a number of actions that are presented later in this report.

Residential and Non-Residential Components and Eligibility

Residential and Non-Residential Components

The Program offers residential and non-residential components.

The residential component allows the mothers to live with their minor child(ren) on a full-time or part-time basis in a designated area within a CSC institution. To further support the mothers in the residential component, the institutions must provide various services, from parenting classes to babysitting services for when the mother has other obligations.

The non-residential component maintains the mother-child bond through services offered by the institution such as recording of storytelling, use of escorted/unescorted temporary absences for family contact/parental responsibilities, private family visits, video visitation, and pumping and storing of breast milk.

Non-Residential Eligibility

All mothers, regardless of security classification, can participate in the non-residential component of the MCP, including inmates in a Structured Intervention Unit. The ability to participate in available options depends on eligibility criteria established in relevant policies.

Residential Eligibility

A mother is eligible to be considered for participation in the residential component of the MCP if:

- they are classified as minimum or medium security
- they have been screened against the relevant provincial child welfare registries to verify whether information exists that should be considered in the decision-making process
- the Child Welfare Agency (CWA) is supportive of their participation
- there is no current assessment from mental health professionals indicating that the mother is incapable of caring for their child due to a documented mental health condition of the child or the mother
- they have not been convicted of an offence against a child or of an offence which could reasonably be seen as endangering a child. An inmate who does not meet this eligibility criterion may be considered for participation if a psychiatric or psychological assessment determines that the inmate does not present a danger to their child
- they are not subject to a court order or other legal requirement prohibiting contact with their child

A child is eligible to be considered for participation in the residential component of the MCP if they are:

- not older than four years of age (no longer eligible at the fifth birthday) for full-time residency in a living unit
- not older than six years of age (no longer eligible at the seventh birthday) for part-time residency in a living unit
- under the age of majority for part-time residency using the private family visit unit

Audit Objectives, Scope and Approach

Audit Objectives, Scope and Approach



Audit Objectives

Objective 1

To provide assurance that the management framework supports the efficient and effective achievement of Mother-Child Program objectives.

Objective 2

To provide assurance that the Mother-Child Program is implemented in compliance with key requirements.

Objective 3

To provide an assessment of progress made on previous Mother-Child Program commitments.

Scope



The audit was national in scope, covered the period from April 2018 to January 2024 and included site visits to four of five regions which are identified in Annex B. The audit included both the residential and non-residential components of the MCP.

Approach



Interviews

90 interviews were conducted with management and staff who are involved in the MCP at national, regional and institutional levels, participants and babysitters.



Review of Documentation

A review of relevant documentation, such as legislation, CDs, job descriptions, committee minutes, corporate documents, and procedural documents were reviewed.



File Review and Testing

File review covered the period of April 2018 to January 2024 and was performed on a number of areas: compliance with MCP requirements, compliance with the MCP decision-making process, removals from the MCP, and timeliness of the MCP application process.



Surveys

Surveys were provided to inmate participants and non-participants of the MCP, as well as CWAs involved in the MCP to assess areas including, but not limited to, awareness of the Program, motivations for participation, sufficiency of infrastructure to support the MCP, and factors impacting CWA support of the Program.



Sampling

Due to the limited number of participants in the MCP over the past several years, the audit team reviewed inmate files for all who have applied to the Program from April 2018 to January 2024.

Audit Findings

Governance and Oversight

The audit team expected to find that there is a governance and oversight structure in place to support the MCP.



Finding: The governance and oversight structure in place for the MCP is limited and insufficient to support consistent implementation, operation and potential expansion of the MCP.

National and Regional Level

While CD 768 outlines governance and oversight responsibilities related to the MCP, the only responsibility related to governance and oversight at the national level defined in CD 768, states: "The Deputy Commissioner for Women is authorized to establish Guidelines, as needed, pertaining to the Mother-Child Program." However, WOS receives monthly reports from the institutions on residential participation, has established the Mother-Child Coordinator (MCC) working group, and has created a vision document that highlights the changes that WOS would like to make to the MCP and an associated Management Action Plan (MAP). The vision document and MAP are explained further on page 15.

CD 768 does not define a regional responsibility for governance and oversight of the MCP.

Institutional Level

Each institution is required to establish a review board to make recommendations to the Institutional Head with respect to mother and babysitter applications, reviews of Program participation, and institutional processes related to any component of the MCP.

All institutions visited created either a specific Mother-Child Review Board or utilized existing boards to support the MCP as required by CD 768. Agendas and meeting minutes were reviewed, and they addressed areas including child welfare assessments, application reviews, and parenting courses.

This limitation in governance and oversight has led to institutions determining their own level of implementation of the MCP, and this has impacted participation rates, resources allocated and used for the Program, Program accessibility, and the quality and consistency of institutional infrastructure to support the Program. This limitation in governance and oversight has also contributed to several key Program issues, including a lack of data available to support strategic decision making, and insufficient support to the institutions to implement, operate and expand the MCP.

Policy Framework

The audit team expected to find that CDs, guidelines, and manuals are in place to support the MCP.



Finding: CD 768 is in place to support the residential component of the MCP, however key challenges exist, and the policy framework requires strengthening to support the non-residential component of the MCP.

Strategic Objectives

The strategic objective of the MCP is clearly outlined in CD 768, which is accessible to all CSC staff on the CSC intranet ('the Hub'). 77% of staff interviewed understand the strategic objective of the Program and are aware of its residential and non-residential components.

Non-Residential Component

The policy framework requires strengthening to support the consistent implementation and management of the non-residential component of the Program. CD 768 includes potential service offerings, and defines certain roles and responsibilities related to the non-residential component of the Program; however, it does not outline expectations related to oversight, service levels, performance measurement, or implementation of the different aspects of the non-residential component. Although the non-residential component is referred to in institutional standing orders, national guidelines and manuals are not in place to support this component.

Due to these challenges in the policy framework, institutions have not had the support necessary to consistently implement the Program which can impact Program participation rates.

Residential Component

While CD 768, Policy Bulletin 654, and institutional standing orders have been developed by National Headquarters (NHQ) or institutions to support the residential component of the MCP, there are challenges in several key areas:

- governance and oversight roles above the institutional level are limited and insufficient
- expectations for performance measurement are not established
- guidance related to suspension and termination of participants from the MCP requires strengthening to support consistent decision making
- expectations for CWA verifications do not provide sufficient detail for consistent decision making
- guidance surrounding document retention and file composition is insufficient

Roles and Responsibilities

The audit team expected to find that roles and responsibilities are defined, documented, communicated and understood.



Finding: Roles and responsibilities related to the MCP are defined, documented and communicated through CD 768, however there are several areas that require clarification.

Roles and Responsibilities

Roles and responsibilities are defined, documented, and communicated through CD 768; however, the audit noted the following opportunities for improvement:

- the MCC role, which is a key role responsible for being the primary contact with the mother, coordinating the MCP and guiding the mother through the MCP, is often more comprehensive than how it is defined in CD 768, and the MCC does not have a defined job description
- governance and oversight roles are not sufficiently defined
- the responsibility to obtain and validate CWA support could be further defined
- responsibilities related to suspensions and terminations from the Program require clarification
- roles and responsibilities related to the non-residential component of the Program require clarification

Further, interviews with institutional staff (e.g. elders and indigenous liaison officers) noted that there is inconsistent awareness and understanding of roles and responsibilities related to the MCP.

The lack of clearly defined, documented, and communicated roles and responsibilities for all key staff, and the absence of a national staff training program, has led to challenges in understanding of certain roles and responsibilities and implementation of the MCP across the country.

Training

A national staff training program has not been developed to communicate roles and responsibilities and help ensure their understanding.

However, CD 768 requires the availability of a parenting skills program for all inmates and that all participants and inmate babysitters in the residential component of the MCP complete this program and a recognized first aid course. Although the audit found that each institution visited has incorporated this training, each is developed independently as a national curriculum does not exist. The audit noted that some institutions are using external service providers to deliver the content.

Documentation review showed that 96% (45/47) of mother participants and 85% (22/26) of babysitter participants (as reported by the site) completed the parenting skills program; and 98% (46/47) of mother participants and 92% (24/26) of babysitter participants (as reported by the site) completed first aid training.

Performance Measurement Strategy

The audit team expected to find that CSC has a performance measurement strategy to determine if the MCP is achieving its objectives.



Finding: A performance measurement strategy, that includes both strategic and operational level performance indicators, is not in place to determine if the MCP is achieving its objectives.

Strategic and Operational Indicators

While the audit noted that a strategic objective has been defined, strategic and operational performance indicators have not been developed to help inform management on progress towards achievement of the objective.

During the audit scope period, the audit found no evidence of the tracking of applications submitted, applications withdrawn, rejections, processing timeframes defined in CD 768, non-residential services provided, or resources required and utilized.

Information Management

Despite the MCP commencing nationally in 2001, limited data exists to support management decision making related to the Program.

The audit noted that applications and decision-making forms are paper based, and the results are archived in the inmate's case management paper file rather than being stored in the Offender Management System. This impacts the accessibility of data for analysis. Even determining past participants of the residential component of the Program was challenging due to the inconsistent and ad hoc manner in which institutions have tracked participation in the past.

To obtain greater amounts of data, WOS has recently launched a pilot project at two institutions that tracks participation by institution, by type, non-residential services offered, and other relevant information. This method of gathering data has the potential to support performance indicators once implemented at all institutions, which is now expected to be in April 2025.

Monitoring

All institutions visited during this audit were monitoring information relevant to the MCP to a limited extent, but there are inconsistencies in the methods used to monitor the information and interviews noted that this information is generally not used to inform decision making related to the MCP.

Institutional management has historically conducted ad hoc monitoring of various elements of the Program, such as participant names, child names, child dates of birth, type of residency, and the date the residency began. However, the information gathered is not consistent across institutions and therefore is not effective for supporting a national performance measurement strategy.

The absence of a national performance measurement strategy is impacting the ability to make informed decisions on the day-to-day management and potential expansion of the MCP.

Infrastructure, Financial and Human Resources

The audit team expected to find that infrastructure, financial, and human resources are in place to successfully implement and expand the MCP.



Finding: An assessment of resource needs, including infrastructure and financial and human resources, has not been completed to support consistent implementation and expansion of the MCP.

Infrastructure

CD 768 does not set minimum infrastructure expectations for the MCP, and as a result, the infrastructure varies at each institution visited and across medium and minimum levels of security. The audit noted the following differences in key infrastructure: having a dedicated Mother-Child unit, having a daycare center, having a visiting area for mothers and children, and having infrastructure accessible to the minimum and medium inmate populations.

Further, interview results from four of the five institutions visited indicated that there was insufficient infrastructure in place to support the MCP. As well, the audit noted that WOS has not completed an infrastructure capacity assessment to determine the maximum number of participants that the current infrastructure can support.

Financial and Human Resources

Based on data reviewed by the audit team, annual funding allocated to the MCP varies between \$58,000 to \$134,000 per site, including salary and Operations and Maintenance (O&M). It was noted that several institutions are not spending their full allocations with funds consistently lapsing or being repurposed over the audit scope period. Despite this reality, staff interviewed at all five institutions visited indicated that they do not believe they have sufficient resources (both salary and O&M) to operate and expand the MCP. This misconception could have an impact on staff motivation and/or willingness to promote participation in the Program.

The MCC is a critical position at each institution. The audit noted that this is not a full time permanently funded position, which has impacted the ability for institutions to recruit and retain committed individuals.

Resource Analysis

The audit team was not provided documentation to demonstrate that a capacity or resource needs assessment (infrastructure, financial, or human) has been completed. Without these assessments, management will not have the necessary information to make an informed decision on the best methods to consistently implement and expand the Program.

Expansion Planning

The audit team expected to find that a plan has been developed to determine the best method for expanding participation in the MCP.



Finding: A vision document and corresponding MAP have been developed to support the expansion of the Program, however, there are challenges with the MAP that will impact the ability to successfully expand the Program in a timely manner.

CSC has developed a vision document and corresponding MAP for the future of the MCP. These initiatives relate to several issues that have now also been highlighted in this audit report.

Vision Document

CSC has made several commitments in response to recommendations from the OCI and the Commissioner's Mandate Letter. WOS has developed a vision document that identifies proposed changes to the Program in order to meet these commitments. Proposed areas for change include:

- a review of eligibility for the residential component
- redefining CSC's requirements and relationship with CWAs
- formalizing relationships with indigenous family support organizations
- redefining the role of the mother-child coordinator
- developing a threat risk assessment
- creation of a national parenting program
- creation of application availability at preliminary assessment
- creation of GL 768-1 Mother-Child Guidelines
- creation of a national mother-child database
- creation of MCP guiding principles

Although a vision document and MAP exist, without a comprehensive expansion plan, there is a risk that expansion-related decisions are not optimal.

Management Action Plan

The MAP outlines detailed actions to be taken in order to address the vision document. Positive steps outlined in the MAP include: development of CSC working groups, the involvement of institutions in consultations, Indigenous and CWA consultations, additional staff that have been assigned to support implementation of the MAP, development of a data pilot project, and policy and guidance revisions, amongst others.

There are additional opportunities to improve the MAP and associated expansion planning, including:

- a capacity and resource needs assessment in advance of investment decisions related to Program expansion
- the establishment of clear and sufficient governance and oversight to ensure consistent Program expansion across institutions
- steps to improve the implementation timelines for key elements
- a clear link between MAP items and how they will drive increased participation and expansion

Program Accessibility

The audit team expected to find that the MCP is accessible to all candidates.



Finding: While elements of the residential and non-residential components of the MCP are offered at all institutions visited, the difference in implementation across institutions is impacting accessibility and participation rates.

Implementation of the Program

The audit observed that the MCP has been implemented (i.e. having established infrastructure and a participant support structure) to some extent at all five institutions visited.

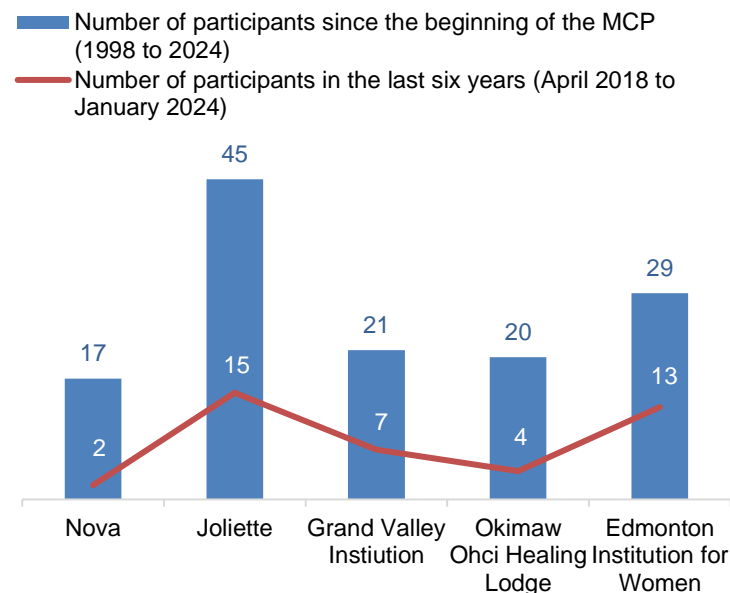
The audit found that there are significant variations in how the Program is implemented across institutions. These variations include:

- Program accessibility for inmates classified as minimum and medium security
- dedicated infrastructure and services available to the participants, such as Private Family Visit access
- dedicated staff resources
- financial resources directed towards Program activities, lapsed and/or reallocated to other programs
- promotion of the Program

These variations are impacting Program access and participation across institutions, with a decline in participation at several institutions from April 2018 to January 2024 that has yet to recover. It should be noted that COVID-19 had an impact on residential participation, however not in a consistent manner across institutions. Certain institutions have struggled to increase participation post-pandemic.

In addition, population pressures, which impact available living space, are affecting the ability to deliver the residential component of the Program at certain institutions.

Institutional participation by mothers in the residential component of the MCP*



*Based on a dataset shared by WOS. The mothers in this data set were originally identified as participants. However, mothers that had no record of participation on either their available paper or electronic files, during the audit scope period, were removed from this data set by the audit team.

Program Accessibility (con't)

Residential Component Accessibility

Observations, surveys, interviews, and document reviews were used to obtain accessibility and participation results.

Given the difference in implementation across the institutions visited, the audit mapped common Program elements to participation rates, and noted the following elements were linked to higher participation when the majority were in place:

- dedicated Program infrastructure (e.g. a unit, daycare, and/or outdoor play yard)
- accessibility to inmates that had been classified as medium and minimum security
- a secure area for the child(ren), and inmate perception that the area is a safe place to have children
- a dedicated MCC
- staff support for the Program
- offering of non-residential services
- documentation that promotes and brings awareness to the Program

Four of the five institutions visited do not have all of these elements in place, with significantly lower participation at three of those sites.

Non-Residential Component Accessibility

There are no defined criteria to determine eligibility for the non-residential component of the Program as it is intended to be accessible to all mothers. While the audit observed that some non-residential elements are implemented, such as the use of video conferencing, no data is maintained to demonstrate which inmates accessed services, or the types of services accessed. As a result, the audit cannot conclude whether all services are being offered and used, or the extent to which these services are accessible to all mothers as outlined in CD 768.

Clear expectations for implementation of the non-residential component of the Program are not in place. This has led to varying levels of accessibility to the non-residential component of the Program across the country.



Program Accessibility (con't)

Child Welfare Agencies

67% (8/12) of CWA survey respondents revealed that they felt they do not have sufficient information/knowledge about the MCP to support a mother's participation.

CSC Employees

Among Regional Headquarters and institutional staff, 89% (40/45) are aware of both the residential and non-residential components of the Program and are therefore well positioned to promote and support it.

Inmates

75% (24/32) of participants and 42% (43/102) of non-participants surveyed across the country are aware of both the residential and non-residential components of the MCP.

Promotion of the MCP

Promotion of the Program to inmates, including promotional methods and timing, varies significantly across the country. All institutions visited have included the MCP to some extent in their institutional handbook. In addition, three institutions have developed documentation that promotes the MCP, such as pamphlets, brochures or a dedicated Mother-Child handbook.

A lack of awareness of both the residential and non-residential components of the MCP, and the reputation of the Program, can impact accessibility and participation rates.

Reputation of the MCP

The reputation of the MCP at the institutions visited is mixed among inmates. Only one institution had a majority of inmate responses indicating that the MCP had a positive reputation. Most negative responses related to the length of time to be accepted into the Program and difficulty being accepted into the Program. This could have a negative impact on inmate desire to apply to the MCP.



Decision Making

The audit team expected to find that review and approval processes for the residential component of the MCP are implemented in compliance with key requirements and considers the safety of the child.



Finding: While generally in compliance with several key requirements of CD 768, ineffective information management practices and a lack of clarity regarding CWA vetting and child safety requirements are impacting the ability to demonstrate compliance in other areas.

Child Welfare Agency Support

CD 768 requires the CWA to support mother and babysitter participation in the MCP before admission. Of the files that were reviewed, documentation to demonstrate the CWAs were consulted was on file for 100% (47/47) of the mother participants and 77% (20/26) of the babysitter participants (as reported by the site). However, institutions are interpreting CD 768 CWA support requirements differently, resulting in institutions accepting inconsistent levels of CWA vetting when making participant admission decisions. For example, one site requests notification if a CWA case exists against the mother unrelated to the Program, whereas another requests written support for participation from the CWA. Alternatively, another site may rely on an external health care professional with a specialization in child care to provide the support as CWA responses were too delayed. The level of analysis varies substantially between these approaches.

9% (4/47) of mother participant files did not contain evidence to demonstrate that the CWA clearly supported the mother's participation in the Program.

Institutional Head Approval

CD 768 requires Institutional Head approval of the application prior to participation. These approvals were on file for all but one of the 58 files reviewed. Similarly, CSC is generally in compliance with the CD 768 requirement that institutional head application decisions be rendered within five days as 78% (45/58) were completed within this timeframe.

Applications and Timeframes

56% (14/25) of survey participants indicated that the application process for the residential or non-residential component of the MCP is clear and simple to follow. 52% (15/29) of participants indicated that Program information provided to them prior to application was clear and accurate. 62% (16/26) of participants indicated that there is sufficient support from CSC staff. That said, lengthy or unclear application steps were noted as a concern at certain institutions.

The timeframe required from initial application to approval has improved over the course of the audit scope. Prior to COVID-19, the average timeframe was 84 days, while the current timeframe is approximately 47 days.

Due to weaknesses with information management practices and documentation retention, the audit team could not validate if timeframes for the various application processing steps (from application to approval) are in compliance with requirements outlined in CD 768.

Decision Making (cont'd)

Vetting for Child Safety

CD 768 establishes that mothers, babysitters, and those living in the Mother-Child Unit must not have committed an offence against a child or an offence which could reasonably be seen as endangering a child.

The audit noted that this requirement is met, however, determining which offenses meet it requires judgment and could lead to inconsistencies between sites. Therefore, the audit noted that this requirement requires greater clarity in order to help ensure child safety and consistency between institutions with respect to its interpretation.

Child Safety within the Institution

While mothers, babysitters, and those living within the Mother-Child unit meet the child safety requirements noted above, the audit team was informed that children had regularly accompanied their mothers to general population areas of the institution (such as the gym, library, and common areas).

Child Proofing

The audit identified that sufficient child proofing measures are not consistently in place, including:

- not having baby gates at stairs, both top and bottom
- an absence of child proofing on the doors of the Mother-Child Unit enabling children to exit their Mother-Child Unit to general population areas
- outdoor play yard gates that do not close and lock (similar to schools/daycare play areas)
- the outdoor play area at one institution was not fenced and had direct access to a parking lot and road

Perception of Safety

80% (24/30) of participant and 59% (49/83) of non-participant respondents felt the Mother-Child area at their institution is a safe place for a child to live.

Management of Risk

There are a number of ways in which child safety risks are managed during a child's participation in the residential component of the Program. For example, the child is to be supervised by the mother or babysitter at all times, there are physical barriers (such as locked doors), there is a correctional officer presence, there are MCCs, there are regular counts/check-ins, and there are formal observation reports.

Commitments in response to the Mandate Letter and the Office of the Correctional Investigator

The audit team expected to find that CSC has implemented or is on track to implement its commitments made in response to the Commissioner's Mandate letter and the OCI.



Finding: CSC has made some progress towards the commitments made in response to the Commissioner's Mandate Letter and OCI recommendations, however, CSC faces challenges in implementing these commitments in a timely manner.

OCI Recommendations

The 49th Annual Report of the Correctional Investigator 2021-2022 published findings and recommendations on the MCP which identified the following areas for improvement: strict Program requirements and eligibility criteria; and the lack of collection, tracking and reporting on the Program.

CSC committed to:

- including an Evaluation/Audit of the MCP in its annual plan (complete)
- reviewing Program requirements with an aim of increasing participation, especially Indigenous participants (ongoing)
- enhancing engagement with external partners and agencies (ongoing)
- working with the Information Management Services Branch to explore ways to ensure information related to participation in the MCP is captured to allow for collection, tracking and analysis of the Program data (ongoing)
- developing and distributing a bulletin to be posted at all women's facilities promoting the Program, its admission criteria, and the application process (redesigned and incorporated into the national promotional plan not due to be fully implemented until 2026)

Commissioner's Mandate Letter

On May 27, 2022, the Minister of Public Safety issued the Commissioner's Mandate letter, which states that the Commissioner is expected to expand promotion for, participation in, and resourcing of the MCP in women's facilities.

WOS has developed a vision document and MAP for the future of the MCP, however a national approach to expand promotion does not exist, participation is low at most institutions, and neither a capacity nor a resource needs assessment (infrastructure, financial, or human) have been completed.

Although in many cases deliverables related to the MAP are not yet due, and activity is beginning to increase, full implementation is not expected until 2026.

Audit Conclusion

Audit Conclusion

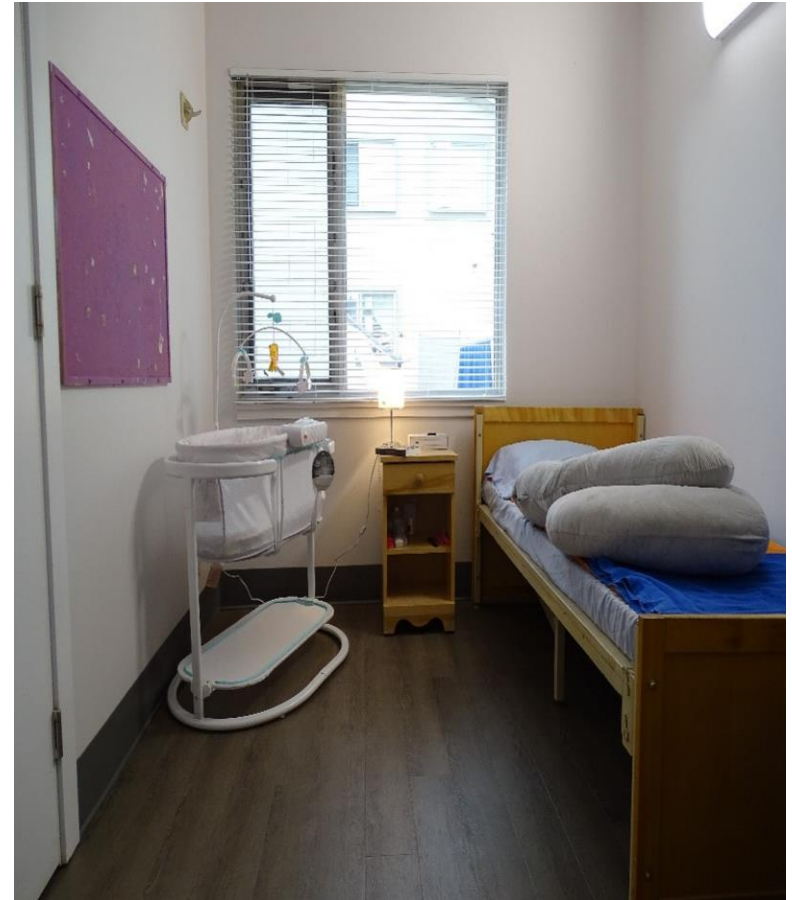
While elements of a management framework exist, it requires strengthening to support the efficient and effective achievement of MCP objectives. Improvements related to the following are required:

- governance and oversight
- the policy framework
- roles and responsibilities
- performance measurement
- infrastructure and resources
- expansion planning

While certain elements of the MCP have been implemented in compliance with key requirements, improvements are required in the following areas:

- consistent accessibility and implementation of the Program across the country
- information management practices
- clarity regarding CWA vetting
- child safety requirements

CSC has made some progress towards the commitments made in response to the Commissioner's Mandate Letter and OCI recommendations, however, CSC faces challenges with implementing these commitments in a timely manner.



Recommendations and Management Response

Recommendations and Management Response

Recommendation	Management Response
<p>1. The Deputy Commissioner for Women, as part of the ongoing policy framework review, should ensure that MCP-related policy instruments and guidance documents provide greater:</p> <ul style="list-style-type: none"> • expectations around Program governance and oversight to help ensure consistent implementation of both the residential and non-residential components of the MCP • clarity related to CWA vetting and support for MCP applicants and participants • direction on suspension and termination of participants from the MCP • definition of key employee roles and responsibilities that incorporate child safety oversight and management 	<p>Accepted. Work is already underway to action these items. By the end of 2026-27, the DCW will have:</p> <ul style="list-style-type: none"> • Developed an official draft of Commissioner's Directive (CD) 768 for consultation, which will include greater governance and direction relating to suspensions, as well as clarity related to Child Welfare Agencies vetting and support for MCP applicants and participants. • Created a job description for the position of the Mother Child Coordinator, which will incorporate child safety oversight and management.
<p>2. The Deputy Commissioner for Women should develop national training and orientation material to support staff in carrying out their responsibilities.</p>	<p>Accepted. By end of fiscal 2026-27, the DCW will:</p> <ul style="list-style-type: none"> • Have ensured orientation materials are created for sites. • Ensure that all staff supporting women are required to take the revitalized Women-Centred Training.
<p>3. The Deputy Commissioner for Women should ensure that a performance measurement strategy is in place to support decision making and reporting. The strategy should include relevant performance indicators that capture key requirements of the MCP.</p>	<p>Accepted. WOS will work with colleagues from other sectors to identify appropriate program measurements.</p>

Recommendations and Management Response *(cont'd)*

Recommendation	Management Response
4. The Deputy Commissioner for Women, while considering safety, security, and cost, should establish national minimum standards for MCP infrastructure.	<p>Accepted. The DCW will collaborate with Technical Services and Facilities Branch to create an infrastructure framework for the program.</p> <p>By end of 2026-27, the DCW will:</p> <ul style="list-style-type: none">• Work in collaboration with Technical Services and Facilities Branch to establish an infrastructure framework for the Mother Child Program.
5. The Deputy Commissioner for Women should ensure that expansion planning considers items such as: <ul style="list-style-type: none">• the governance and oversight required to successfully oversee and implement the expansion plan• an assessment of resource needs, including infrastructure and financial and human resources• identification of methods to promote and raise awareness of the Program in order to meet expansion goals• steps to improve implementation timeframes for actions undertaken to respond to the Commissioner's Mandate Letter• a clear link between expansion plan items and how they will drive increased participation and expansion	<p>Accepted. A framework has already been developed in 2022 and will require amendments to reflect the findings from the Audit.</p>

Annexes

Annex A: Audit Objectives and Audit Criteria

Objectives	Criteria
Objective 1 To provide assurance that the management framework supports the efficient and effective achievement of Mother-Child Program objectives.	1.1 A governance and oversight structure is in place to support the Mother-Child Program.
	1.2 Commissioner's Directives, guidelines and manuals are in place to support the Mother-Child Program.
	1.3 Roles and responsibilities are defined, documented, communicated and understood.
	1.4 A performance measurement strategy is in place to determine if the Mother-Child Program is achieving its objectives.
	1.5 Infrastructure, and financial and human resources are in place to successfully implement and expand the Mother-Child Program.
	1.6 A plan has been developed to determine the best method for expanding participation in the Mother-Child Program.
Objective 2 To provide assurance that the Mother-Child Program is implemented in compliance with key requirements.	2.1 The Mother-Child Program is accessible to all candidates.
	2.2 The review and approval process for the Mother-Child Program is implemented in compliance with key requirements and considers the safety of the child.
Objective 3 To provide an assessment of progress made on previous Mother-Child Program commitments.	3.1 CSC has implemented, or is on track to implement, its commitments made in response to the Commissioner's mandate letter and the Office of the Correctional Investigator.

Annex B: Institutions Offering the Mother-Child Program

Regions	Institutions Offering the Mother-Child Program
Atlantic	Nova Institution for Women
Quebec	Joliette Institution for Women
Ontario	Grand Valley Institution for Women
Prairie	Edmonton Institution for Women
	Okimaw Ohci Healing Lodge for Women
Pacific	Fraser Valley Institution for Women

* Institutions in **bold** were selected for institutional visits as part of this audit.

Annex C: Legislation and CSC Policy Framework

There are several legislative and policy requirements that relate to the MCP, including:

Federal Legislation

Constitution Act, Canadian Charter of Rights and Freedoms (Charter)

- Section 7 – Protects individuals rights to security of the person, which includes the interests of mothers and infants to remain together

Corrections and Conditional Release Act (CCRA)

- Section 4 – Staff must be properly trained
- Section 58 – Describes searches of cells
- Section 59 – Describes searches of visitors, including children
- Section 71 – Discusses contacts and visits

Corrections and Conditional Release Regulations (CCRR)

- Sections 51, 52 and 53 - Describe the searches of cells

Privacy Act

- Governs the collection, protection and sharing of personal information by the government

An Act respecting First Nations, Inuit and Métis children, youth and families (Federal)

- Affirms the inherent right of self-government of Indigenous communities, including jurisdiction in relation to child and family in relation to Indigenous children

Provincial Legislation

Each province has enacted their own child protection act. These acts govern the child welfare services in the province and define the best interest of the child and the duty to report when a child is in need of protection.

International Legislation

United Nations Convention on the Rights of the Child

- Stipulates that children should not be separated from their parents unless it is necessary for the best interest of the child

United Nations Rules for the Treatment of Women Prisoners and Non-custodial Measures for Women Inmates

- Reinforce principle that decisions to allow the children to stay with their mothers in prison must be based on the best interests of the child

Annex C: Legislation and CSC Policy Framework (*cont'd*)

CSC Policy Instruments

The main policy instrument in place for the MCP is CD 768 and associated Policy Bulletin 654. Its purpose is to provide direction to implement, maintain and monitor the Institutional MCP. CD 768 also defines the responsibilities of staff as well as Program eligibility and participation requirements. Other policy instruments that contain information that is applicable to the MCP, include:

- Institutional Standing Orders
- CD 566-3 – Inmate Movement
- CD 566-4 – Counts and Security Patrols
- CD 566-8 – Searching of Staff and Visitors
- CD 566-9 – Searching of Cells/Rooms, Vehicles and Other Areas
- CD 568-1 – Recording and Reporting of Security Incidents
- CD 710-3 – Temporary Absences
- CD 715-3 – Community Assessments
- CD 715-4 – Case Preparation and Supervision of Women Offenders with Children Residing at a Community-Based Residential Facility
- CD 800 – Health Services
- CD 860 – Offender's Money

Annex D: Statement of Conformance

This internal audit engagement was conducted in conformance with *the International Standards for the Professional Practice of Internal Auditing*, the Treasury Board of Canada *Policy on Internal Audit*, and the Treasury Board of Canada *Directive on Internal Audit*, as supported by the results of the Quality Assurance and Improvement Program of Correctional Service Canada.

Daniel Giroux, CIA
Chief Audit and Evaluation Executive