

# CORRECTIONAL SERVICE CANADA

CHANGING LIVES. PROTECTING CANADIANS.



## Audit of the management of community staff safety

**INTERNAL AUDIT SECTOR  
JANUARY 17, 2017**

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## EXECUTIVE SUMMARY

### What We Examined

The Audit of the Management of Community Staff Safety was conducted as part of Correctional Service Canada (CSC) Internal Audit Sector's 2015-2018 Risk-Based Audit Plan.

The objectives of this audit were to provide assurance that:

- An effective management framework was in place to support community staff safety; and
- CSC was in compliance with relevant legislation and policies related to the management of community staff safety.

The audit was national in scope and included physical visits to a sample of parole offices and Community Correctional Centres comprising all eight districts. The scope of the audit focused on the safety of staff working in the community while interacting with offenders.

The audit examined the community staff safety initiative and whether an effective management framework, including a formalized governance structure, was in place. The audit also assessed whether policies and procedures supported the initiative. Additionally, the audit examined compliance with the various procedural requirements related to staff safety.

### Why it's Important

Ensuring staff safety is one of CSC's strategic priorities. Within the community, CSC is responsible for the management of 92 parole offices and sub-parole offices and 15 Community Correctional Centres (CCCs). Approximately 1,500 staff, including parole officers, parole officer supervisors, CCC managers, clerical staff, reintegration workers, nurses and social workers working in those facilities interacts, either through supervision or other related duties, with approximately 8,000 offenders under various types of releases. These interactions can occur at the parole offices, in Community Correctional Centres, in group settings such as program rooms, at the offender's place of employment or at the private residence of either an offender or one of their community contacts.

Not being able to maintain required levels of operational safety and security in the community is one of the identified corporate risks for the CSC.

The Assistant Commissioner, Correctional Operations and Programs, who is responsible for overseeing the policy requirements related to the safety of staff interacting with offenders in the community, has been identified as the Office of Primary Interest for this audit.

### What We Found

With respect to the first objective, the audit team found that many aspects of the management framework in place supported the effective management of staff safety in the community. CSC ensured that the internal policy requirements related to community staff safety aligned with the various legislations, including the *Canada Labour Code*. Roles and responsibilities were generally defined and understood, management was using available information for decision making and staff safety related training was provided and taken by those individuals working in the community.

However, the audit team identified areas where the management framework requires further improvements to better manage community staff safety. These areas of concern include:

- Lack of specificity in identifying positions responsible to oversee both the sign-in/sign-out of staff and the recording of security incidents;
- Confused perception of the role of community security intelligence officers;
- Lack of refresher training / awareness sessions related to staff safety; and
- Recurring staff safety related issues remain unaddressed.

For the second audit objective, the audit team found strong compliance with many of the CSC's policies and procedures. Some of these areas included the completion of staff safety assessments, strong communication practices at the local levels between management and employees to discuss staff safety concerns, awareness of the relevant emergency procedures and design of community facilities as per the standards.

However, the audit found a number of areas where the CSC could improve in order to comply with relevant legislation and policies, in terms of community staff safety. Some of these areas include:

Reporting and disseminating all security incidents affecting staff in the community to assist management in addressing risk to staff;

- Clarifying requirements related to the sign-in/sign-out system to ensure management knows that staff is safe;
- Ensuring that the layout of all parole offices allows for full line of sight of the waiting and operational zones and the provision of a safe egress for staff should an emergency occur; and
- The regular conduct and review of Threat and Risk Assessments for community offices to identify ongoing staff safety threats.

Recommendations have been made to address issues identified in the report and management has created an action plan to address these concerns.

## Management Response

Management agrees with the audit findings and recommendations as presented in the Audit Report. Management has prepared a detailed Management Action Plan to address the issues raised in the audit and associated recommendations. The Management Action Plan is scheduled for full implementation by March 31, 2018.

## ACRONYMS & ABBREVIATIONS

**ACOCSS:** Advisory Committee on Community Staff Safety

**BOI:** Board of Investigation

**CCC:** Community Correctional Centre

**CCLO:** Community Corrections Liaison Officer

**CCRA:** Corrections and Conditional Release Act

**CRF:** Community Residential Facility

**CSC:** Correctional Service Canada

**NHQ:** National Headquarters

**OHS:** Occupational Health and Safety

**OMS:** Offender Management System

**OPI:** Office of Primary Interest

**OSH:** Occupational Health and Safety

**PO:** Parole Office

**POS:** Parole Officer Supervisor

**RHQ:** Regional Headquarters

**SIO:** Security Intelligence Officer

**TRA:** Threat and Risk Assessment

**USGE:** Union of Solicitor General Employees

# 1.0 INTRODUCTION

## 1.1 Background

The Audit of the Management of Community Staff Safety was conducted as part of the Correctional Service Canada (CSC) Internal Audit Sector's 2015-2018 Risk-Based-Audit-Plan.

Ensuring staff safety is one of CSC's strategic priorities<sup>1</sup>. Within the community, CSC is responsible for the management of 92 parole offices and sub-parole offices and 15 Community Correctional Centres<sup>2</sup> (CCCs). Approximately 1,500 staff<sup>3</sup>, including parole officers, parole officer supervisors, CCC managers, clerical staff, reintegration workers, nurses and social workers working in those facilities interacts, either through supervision or other related duties, with approximately 8,000 offenders under various types of releases. These interactions can occur at the parole offices, in Community Correctional Centres, in group settings such as program rooms, at the offender's place of employment or at the private residence of either an offender or one of their community contacts.

Not being able to maintain required levels of operational safety and security in the community is one of the identified corporate risks for the CSC.

While it is recognized by both the employer and staff interacting with offenders in the community that some personal safety risks are inherent to their responsibilities, the *Canada Labour Code* reinforces the legal obligation of the employer to ensure that the health and safety of every employee is protected while they are working. Concurrently, employees have a responsibility to take all reasonable and necessary precautions to ensure their health and safety and that of anyone else who may be affected by their work or activities. These responsibilities are defined in applicable policies and guidelines, listed under section 1.2 of the report.

In 2004, the murder of a community parole officer by an offender, while performing her duties in the community, prompted CSC to review and strengthen its framework to address staff safety issues in the community.

The Advisory Committee on Community Staff Safety (ACOCSS), a joint committee between CSC and the Union of Solicitor General Employees (USGE), was immediately established and is still active. The ACOCSS was mandated to review and develop initiatives to address community staff safety concerns such as staff training, technological support, facility standards, operational policies, practices, and resources, and report on its activities to the National Joint Occupational Health and Safety Policy Committee.

A joint National Parole Board of Canada/Correctional Service of Canada Board of Investigation (BOI)<sup>4</sup> was also convened to review the incident. The 2004 report made a total of 71 recommendations, 20 of which touched specifically on community staff safety. In response, CSC implemented a series of measures to increase the level of safety and to raise the level of awareness about staff safety issues related to community supervision practices. Many of these have since been integrated into policy, including tandem supervision, sign-in/sign-out procedures and the use of flags/alerts in the Offender Management System (OMS) to identify offenders who exhibit assaultive, threatening or other behavior towards staff or others.

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<sup>1</sup> Correctional Service of Canada, Report on Plans and Priorities, 2016-2017

<sup>2</sup> Correctional Service of Canada, Corporate Business Plan 2015-2018

<sup>3</sup> Correctional Service of Canada, Workforce Statistical Profile 2014

<sup>4</sup> National Joint Board of Investigation into the release and supervision of an offender on full parole charged with first-degree murder of a parole officer on October 7, 2004 in Yellowknife, Northwest Territories.



As well, an Employee Protection Protocol now offers specific mechanisms to assess and manage instances when risks can exceed the normal conditions of work for staff and put the safety of an employee and/or an employee's family at greater risk than normal (for example, violent occurrences, threats and security incidents).

Finally, CSC continues to explore, through the Community Staff Safety Initiative, the use of technology and software to enhance the safety of community staff members and the public.

## 1.2 Legislative and Policy Framework

Various legislation and policy documents govern the management of staff safety in federal departments and reinforce the obligations of employers/employees in performing their duties. Those include:

### LEGISLATION AND REGULATIONS

#### CANADA LABOUR CODE (CLC)

By law, the federal government of Canada must ensure all employees are provided with a safe<sup>5</sup> and healthy work environment. The *Canada Labour Code (CLC) Part II* establishes the legislative framework and outlines the duties and responsibilities of both the employer and the employees pertaining to occupational health and safety (OHS).

#### CANADA OCCUPATIONAL HEALTH AND SAFETY REGULATIONS

The *Canada Occupational Health and Safety Regulations* touch upon the importance of providing staff with the right equipment, preventing hazardous occurrences and conducting investigation, recording and reporting of those occurrences. As well, this legislation supports a safe occupancy of the workplace, which includes the importance of having emergency plans and procedures, as well as violence prevention in the workplace. This legislation reinforces the need for the employer to assess the potential for workplace violence, develop and implement controls to eliminate or minimize workplace violence or a risk of workplace violence to the extent reasonably practicable.

CSC has done so by developing its own Violence Prevention in the Workplace Policy which was approved in June 2014 by CSC's Executive Committee (EXCOM).

#### CORRECTIONS AND CONDITIONAL RELEASE ACT (CCRA)

Part 4 of the *CCRA* states that the Service must use measures that are consistent with the protection of society, staff members and offenders and that staff members be properly selected, trained and given good working conditions, including a workplace environment that is free of practices that undermine a person's sense of personal dignity.

### POLICY FRAMEWORK

#### GOVERNMENT SECURITY POLICY

Under the Government Security Policy<sup>6</sup>, deputy heads are responsible to help ensure individuals are protected against workplace violence.

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<sup>5</sup> In Part II of the Canada Labour Code, "safety" is defined as "protection from danger and hazards arising out of, linked with or occurring in the course of employment."

<sup>6</sup> Treasury Board of Canada, April 1<sup>st</sup> 2012: Government security is the assurance that information, assets and services are protected against compromise and individuals are protected against workplace violence.

## **TREASURY BOARD POLICY ON OCCUPATIONAL SAFETY AND HEALTH**

The main objectives of this policy are to promote a safe and healthy workplace for public service employees, as well as to reduce the incidence of occupational injuries and illnesses. Under this policy, the CSC is to implement the requirements of the *Canada Labour Code, Part II* and its regulations, as well as establish and maintain effective occupational safety and health (OSH) programs consistent with Treasury Board policies, standards and procedures. Concurrently, employees are expected to learn and follow the OSH provisions of the workplace, take reasonable precautions to protect themselves and other employees, and report all accidents and hazards.

## **CORRECTIONAL SERVICE OF CANADA COMMISSIONER'S DIRECTIVES (CD'S) AND GUIDELINES**

There are several Commissioner's Directives and guidelines that address community staff safety, some of which are more specifically related to staff safety:

### **COMMISSIONER'S DIRECTIVE 566 – FRAMEWORK FOR THE PREVENTION OF SECURITY INCIDENTS**

This directive serves to establish a framework and direction for the prevention of security incidents, which should contribute to the safety of the public, staff and offenders. It applies to staff at all security levels of institutions including Community Correctional Centres.

### **COMMISSIONER'S DIRECTIVE 568-1 – RECORDING AND REPORTING OF SECURITY INCIDENTS**

This directive was developed to ensure that information related to security incidents is recorded and reported in a consistent, accurate and timely manner.

### **COMMISSIONER'S DIRECTIVE 600 – MANAGEMENT OF EMERGENCIES**

This policy ensures that all operational units develop contingency plans to deal with all types of internal and external emergencies, and that these contingency plans be reviewed at least every 12 months.

### **COMMISSIONER'S DIRECTIVE 714 – COMMUNITY CORRECTIONAL CENTRE STANDARDS**

The purpose of this directive is to establish standards and requirements for the safe operation of Community Correctional Centres (CCC).

### **COMMISSIONER'S DIRECTIVE 715 – COMMUNITY SUPERVISION FRAMEWORK**

The purpose of this directive is to establish a framework for the supervision and support of offenders in the community that promotes their reintegration and active involvement in meeting the objectives of their Correctional Plan. It also provides direction to ensure that:

- Significant staff safety issues are dealt with pursuant to the Employee Protection Program Guidelines;
- All incidents involving community staff safety are documented, monitored and action is taken; and
- Parole offices and Community Correctional Centres have a sign-in/sign-out system in place and up-to-date emergency plans.

## **COMMISSIONER’S DIRECTIVE 715-1– COMMUNITY SUPERVISION**

This directive was developed to provide direction on assessing and managing an offender’s transition to the community following release and on the completion of Staff Safety Assessments and application of tandem supervision.

## **EMPLOYEE PROTECTION PROTOCOL GUIDELINES AND RISK MANAGEMENT PROTOCOL**

This guideline is to help managers identify, protect and support employees under threat of violence in increased threat situations. It is also intended to help all personnel understand situations involving threats or intimidation, to assess and minimize their impacts and to take appropriate actions.

## **FACILITY GUIDELINES FOR PAROLE OFFICES**

These guidelines, created by CSC, identify the unique requirements associated with parole offices. As Public Works and Government Services Canada (PWGSC) acquires federal government office accommodation based on generic office and fit-up standards, these guidelines serve as the basis for obtaining an exemption to the current generic standards.

### **1.3 CSC Organization**

The roles and responsibilities linked to the management of community staff safety are dispersed within each level of the community structure.

#### **National Headquarters (NHQ)**

The Office of Primary Interest for Community Staff Safety is the Correctional Operations and Programs Sector of CSC. The national governance of community staff safety is supported by programs and services that are offered by different branches of the Correctional Operations and Programs Sector.

The Community Reintegration Branch’s primary focus is to support and layout the rules to guide the day to day activities of the parole units, staff and related operations. This Branch is responsible for facilitating and monitoring the legislative amendments and policy development/reviews related to community supervision, the Advisory Committee on Community Staff Safety (ACOCSS), the summary of Boards of Investigations into community incidents, and the Community Correctional Centres.

The Security Branch is responsible for implementing the policy framework in support of a safe, secure, working and living correctional environment (in CCCs) and addressing issues related to safety and security in the community. It is responsible for gathering and sharing information and intelligence to prevent security incidents, eradicate illegal activity, and to support the case management process. It is also responsible for the Employee Protection Protocol and for establishing national procedures for the reporting of incidents.

#### **Regional Headquarters (RHQ)**

The Regional Deputy Commissioners and the Assistant Deputy Commissioners, Correctional Operations are responsible for ensuring that community supervision and security policies and procedures are effectively communicated to operational units and that significant staff safety issues are dealt with pursuant to the Employee Protection Protocol Guidelines. They are also responsible for overseeing the procedures for the consistent recording and reporting of security incidents within the region. Finally, they maintain the strategic intelligence capacity to mitigate safety and security risks.

#### **Districts, Areas & Community Facilities (Parole Offices and Community Correctional Centres)**

The District Directors are responsible for establishing a process to monitor compliance and the effective implementation of policies that include, but are not limited to, procedures related to tandem supervision, the sign-in/sign-out system and up-to-date emergency plans, including contact information, for dealing with security incidents, while ensuring that staff are trained on those plans. In addition, District Directors must ensure that all incidents involving community staff safety are documented, monitored and action is taken.

The Associate District Directors (ADD) provide direction as required to the Security Intelligence Officers / Parole Officer Supervisors on all preventive security and intelligence matters, and ensure that the pertinent local information/intelligence is shared with other CSC sites and partner agencies as required.

As for the Area Directors, who are responsible for the parole offices and the CCCs within their area, one of their roles is to review the submissions for an exception to the application of the tandem supervision.

Finally, Parole Officer Supervisors are responsible to identify and take action on issues that have a possible impact on staff safety. They can review and remove a tandem supervision requirement and they are also responsible, as are the Parole Officers and Security Intelligence Officers, for ensuring that:

- Staff safety needs are identified and promptly discussed and reviewed by their immediate supervisor;
- Staff Safety Assessments are completed in a timely manner and are reviewed prior to the first meeting with an offender in the community and the review is documented in a Casework Record;
- The sign-in/sign-out system is utilized for all community case management activities;
- No offenders are interviewed when a staff member is alone in the parole office; and
- Any situation which could jeopardize the safety of the operational unit is immediately communicated to the appropriate designated manager.

## 1.4 Risk Assessment

The Audit of Management of Community Staff Safety was identified as an audit priority and an area of high risk to CSC in Correctional Service Canada (CSC) Internal Audit Sector's 2015-2018 Risk-Based-Audit-Plan. A scan was conducted of policies, past audit work, the results of external reports and other available information. A risk assessment of the management of community staff safety was then completed based on the results of the scan and preliminary interviews with the Office of Primary Interest (OPI), members of CSC's senior management as well as managers and staff at the community level.

Overall, the preliminary risk assessment identified that the possible main risks to CSC related to the following: the possible lack of clarity of the governance structure surrounding the staff safety portfolio; CSC facilities in the community being unsafe; relevant and accurate information about staff safety concerns related to offenders not being available in a timely manner; staff's inability to request and/or receive timely assistance if and when required (equipment focused); procedures/protocols not effectively implemented at the local level to address staff safety; management not being able to identify and/or respond to a situation where staff may be at risk; lack in reporting issues and concerns related to staff safety by front-line staff that may not be assessed by management to allow for the effective decision making; and staff and managers not possessing the necessary knowledge and skills to perform their jobs safely and effectively. The audit aimed, in part, to determine if the controls surrounding those risks were effective.

## 2.0 OBJECTIVES AND SCOPE

### 2.1 Audit Objectives

The objectives of this audit were to provide assurance that:

- An effective management framework was in place to support community staff safety; and
- CSC was in compliance with relevant legislation and policies related to the management of community staff safety.

Specific audit criteria are included in **Annex A**.

### 2.2 Audit Scope

The Audit of the Management of Community Staff Safety was national in scope and included physical visits to a sample of parole offices and Community Correctional Centres covering all eight districts. The scope of the audit focused on the safety of staff working in the community while interacting with offenders.

The audit examined the community staff safety initiative and whether an effective management framework, including a formalized governance structure, was in place. The audit also assessed whether policies and procedures supported the initiative. Additionally, the audit examined compliance with the various procedural requirements related to staff safety.

The following areas, although related to staff safety, were scoped out of the current audit as they were either too specific and could warrant an audit on their own, or they surpassed the capacity of this audit:

- Staff safety issues caused by any means other than offender related information or contact;
- Specific compliance testing related to Occupational Health and Safety (OHS) Committees and meeting frequency;
- Staff safety concern for individuals employed by a Community Residential Facility (CRF) or other contracted body;
- The business recovery process following an incident;
- The compliance of the emergency plans, with the exception of the staff safety relevant components;
- The maintenance of Government fleet vehicles;
- Facility standards not related to the supervision activity of offenders; and
- The specific requirements of Memorandums of Understanding with various partner organizations.

## 3.0 AUDIT FINDINGS AND RECOMMENDATIONS

### 3.1 Management Framework

The first objective of this audit was to provide assurance that an effective management framework was in place to support community staff safety.

The management framework for community staff safety was examined from three perspectives: CSC's policy framework and directives, roles and responsibilities and CSC's use of available information on community staff safety for decision-making. **Annex A** provides high level results for all audit criteria.

The following sections highlight areas where expectations were met and where management attention is required.

#### 3.1.1 Policy Framework

We expected to find that CSC's Commissioner's Directives, guidelines and manuals were clear, that they supported the management of community staff safety and that they complied with applicable legislation.

**Overall, the audit team found many areas where the expectations for this criterion were met:**

- **Although no specific community staff safety policy was in place, staff safety requirements were included in various Commissioner's Directives and guidelines and no contradictions were noted between these requirements;**
- **Generally, policy requirements related to community staff safety were clearly defined and mostly understood; and**
- **Applicable Commissioner's Directives and guidelines were in line with relevant legislation and Treasury Board policies related to staff safety.**

However, the following area requires additional attention.

The requirements related to the sign-in and sign-out system, used by employees when conducting community supervision visits, were not clearly defined within the applicable Commissioner's Directive and as a result were not consistently effective.

Commissioner's Directive 715 – *Community Supervision Framework* states that District Directors are responsible for ensuring that parole offices and Community Correctional Centres have a sign-in/sign-out system in place and that all staff members are responsible for ensuring that the system is utilized for all community case management activities.

As will be discussed in section 3.2.3, the audit team found a significant variation in the systems being used to track the whereabouts of employees conducting community case management activities, along with their individual systems' ultimate effectiveness. As staff in the community

spend a great deal of time interacting with offenders outside of the office, CSC must have a system in place to enable the tracking of staff members' whereabouts so that assistance can be provided in case the staff member is found in distress or fails to return to the office. As the current policy provides no specifications on what must be included in the sign-in/sign-out system, the audit team raised concerns about whether managers in the community would be able to assist an employee in distress outside of the office if required.

### 3.1.2 Roles and Responsibilities

We expected to find that roles and responsibilities were clearly defined, communicated and understood.

**With noted exceptions, the audit team found that roles and responsibilities were generally clear and understood by staff working in the community. Namely, the audit team found that:**

- **Generic job descriptions, although dated in some instances, existed for all relevant community staff positions and generally described the duties of each staff involved in ensuring staff safety;**
- **Commissioner's Directives defined roles and responsibilities for the majority of the duties assigned to various positions; and**
- **Individuals working in the community had a strong understanding of their roles and responsibilities as per the policy requirements, and in terms of staff safety, that responsibility was understood as being shared with the employer.**

Nonetheless, the following areas of concern were noted:

***Community Security Intelligence Officers' perception of their roles and responsibilities is inconsistent.***

As per Commissioner's Directive 568-2 – *Recording and Sharing of Security Intelligence and Information*, one of the community Security Intelligence Officer's role, as part of the case management team, is to gather, assess, record and share intelligence information on offenders. This includes sharing any emerging information that could impact staff safety, including security threat group information. Within the community, each district has one, or at most two, community security intelligence officers to represent all of their offices.

Overall, the audit team found that the perception of the role of the community security intelligence officer varied between officers in different districts. Some understood that their role was solely to exchange information with police representatives, while others believed they needed to be more involved in sharing information and providing advice to staff and managers who had a need-to-know, for the successful and safe management of offender-related duties in the community. Security intelligence officers in the community raised concerns that, although a job description exists for their position, it does not necessarily reflect their actual duties in the community. The current job description does not clearly differentiate their role in the community from their colleague's role in an institutional setting.

It was observed that the office location of the various security intelligence officers also varied between districts. In some instances, officers worked out of a Parole Office or Community Correctional Centre, others worked out of a regional office, and the remaining were co-located within a local police detachment. These varying office locations affected their overall assessment of their responsibilities, as some focused more on offenders in their local area instead of the district as a whole, or on sharing information to partners instead of sharing information with CSC staff.

***The responsibility of who should enter community staff safety incident reports in the Offender Management System is unclear.***

The audit team found that there seems to be confusion in the roles and responsibilities attributed to security intelligence officers and parole officer supervisors as it relates to entering community incident reports in the Offender Management System.

According to Commissioner's Directive 568-1 – *Recording and Reporting of Security Incidents*, the Security Intelligence Officer or delegate, if applicable, is responsible for completing those

reports in the Offender Management System, while further sections of the policy state that staff, Parole Officer Supervisors and Security Intelligence Officers are responsible for entering incident reports in the Offender Management System. This was raised as a concern by both security intelligence officers and parole officer supervisors we spoke to, as they felt the confusion in responsibility might impact the sharing of relevant information on offender's risk and create an undue risk for staff's safety. It could also impact the effectiveness of data entry into the Offender Management System.

***Although the Commissioner's Directive states that Districts Directors are accountable for implementing a sign-in/sign-out system, it remains unclear who should actually monitor, on a continuous basis, the whereabouts of staff who conduct offender-related duties outside the office.***

Due to the inherent risks of community staff interacting with offenders outside of the office, keeping track of the whereabouts of all employees at all times is vital to ensure that effective staff safety be maintained. As previously discussed in section 3.1.1 Policy Framework, District Directors must ensure that each local office has a sign-in/sign-out system in place and that all staff members must use this system for all community case management activities. As the current policy framework does not provide further specifications, it is not clear amongst staff at individual parole offices on who should monitor the whereabouts and ultimate safe return of staff.

During site visits, the audit team found that this function was assigned to different positions depending on the local office. In some districts, this responsibility was delegated to the case management assistants, while in others the Parole Officer Supervisor was doing it. In other offices, including Community Correctional Centres, this was either delegated to a commissionaire or had been subcontracted to a company specializing in the monitoring of staff.

While the audit team found that with varying success, community offices were monitoring their staff's whereabouts, there were still concerns raised about which position should be tracking it at the local level. In offices where the case management assistants were monitoring staff whereabouts, these individuals believed that the onus should be on the Parole Officer

Supervisor as this responsibility fell outside of their job description. Conversely, although sites where Parole Officer Supervisors were responsible to verify staff's whereabouts expressed a belief that they would notice if an employee was missing, they expressed concerns that their workload could impact their capacity to respond in a timely manner. The lack of clarity within policy of who should verify that staff has safely returned from a community visit could put an employee in jeopardy should the staff member be in distress or fail to return. Resolution of this issue has long been outstanding. At this time, this issue remains unresolved, as discussions are still occurring between Correctional Service of Canada and stakeholders.

***The national entity mandated to oversee the advancement of applicable policies and initiatives on community staff safety issues has been idle for long periods of time.***

The mandate of the Advisory Committee on Community Staff Safety (ACOCSS) was to review and develop initiatives to address community staff safety concerns related to staff training, technological support, facility standards, operational policies, practices and resources.

The audit team found that during the scope period of April 2012 to January 2016, ACOCSS was not an effective mechanism to address community staff safety issues; it was not meeting as mandated nor satisfying the requirements listed in its terms of reference. As such, issues surrounding community staff safety did not have an active forum to address concerns.

We encourage management to proceed with an effective mechanism to ensure that community staff safety issues do not go unaddressed.



### 3.1.3 Informed Decision-Making

The audit team expected to find that Management is using the available information on community staff safety for decision-making in the advancement of community staff safety policies and initiatives.

***While management is using available information on community staff safety to develop procedures and improve policies and initiatives, recurring staff safety related issues remain unaddressed.***

Information on community staff safety issues can originate from various sources, including: staff grievances, investigation results, refusals to work, formally reported security incidents or any other forums including the ACOCSS.

Over a three-year period, between April 2012 and October 2015, the audit team found that one staff grievance was filed, one community incident warranted a national investigation, one employee claimed a refusal to work under section 128<sup>7</sup> of the *Canada Labour Code* and 47 staff safety-related community security incidents were recorded in the Offender Management System.

The audit found that this information, combined with staff safety issues discussed through other forums including ACOCSS, prompted CSC to develop or improve certain staff safety practices, policies and initiatives. As a result, processes around the Employee Protection Protocols were strengthened, policy updates were completed regarding staff safety assessments, and a tool was developed to strengthen staff awareness on factors to consider when conducting offender related interactions in the community.

Through the analysis of the information brought forward to management during the scope period, the audit found that recurring staff safety issues remained unaddressed as of now, and warrant further consideration. Some of these include:

- The long identified need for a community staff safety refresher training, including training for clerical staff, as well as training/awareness sessions on security threats groups and the Employee Protection Protocol;
- The provision of effective equipment for staff, namely for use in remote and rural areas;
- Clarity as to what community incidents should be reported and how this reported information should be disseminated and shared, even if a specific protocol was developed to that effect;
- Clarity on who should track Parole Officer's whereabouts in the community; and
- The insufficient sharing of offender-related information between police and CSC, namely since the removal of the Community Correctional Liaison Officer positions in the community in 2012.

Audit testing confirmed that issues continue to exist and are reflected in compliance results throughout section 3.2 of this report.

### 3.1.4 National Training Standards

We expected to find that National Training Standard courses related to staff safety were being provided to and taken by staff working in the community.

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<sup>7</sup> Subject to section 128 of the *Canada Labour Code*, an employee may refuse to work in a place or perform an activity if the employee believes that a condition exists, or the performance of an activity constitutes a danger to the employee or another employee.

The National Training Standards represent the fundamental learning and development requirements that employees need in order to perform certain aspects of their roles and responsibilities. The Service monitors training compliance with these standards to ensure that it is meeting its obligations under various legislation and policy. As it relates to the safety of staff working in the community, the National Training Standards include a number of required training courses, such as:

- Parole Officer Induction Training;
- Community Personal Safety Training;
- Managing Community Incidents Training; and
- Supervising Community Professionals Training.

**Through an analysis of Human Resources Management System data related to the completion of training, the audit team found that, with noted exceptions, employees are typically compliant with the relevant staff safety training requirements as per the National Training Standards.**

While the audit team found that individuals were being offered and taking the required training, other issues related to training were found.

***Although high rates of compliance were found related to the prescribed staff safety training, concerns were raised regarding the lack of refresher training.***

The National Training Standards prescribe the training that must be provided to staff working in the community. While compliance rates were high, the audit team found that National Training Standards did not provide for any ongoing or refresher training related to staff safety.

Through interviews with individuals working in various capacities within the community, the audit team found that staff members were of the opinion that a one-time training was insufficient, as they work in a dynamic risk environment in which their skills and competencies in terms of ensuring their safety is constantly challenged. One area where staff expressed a high desire for refresher training related to disengagement, as this would provide them with the necessary skills to withdraw from a potential activity or situation which may jeopardize their safety. In past ACOCSS meetings, and as part of commitments made in response to the investigation report on the death of a community parole officer, a discussion revolved around creating a refresher training course on staff safety.

In many Districts, the audit found that the importance of staff safety is reiterated to employees regularly during staff meetings. In many cases, these meetings provide an opportunity for staff to be informed of any current staff safety concerns. Some Districts arranged for guest speakers to come to staff meetings to speak about a specific topic related to staff safety. As this varied by region, the audit team found that individuals may not have all the required or consistent knowledge to do their job.

The lack of ongoing staff safety refresher training may not allow staff to fully develop the skills and confidence in their ability to maintain personal safety in their interactions with offenders, which might increase safety risks should a situation emerge. This is reflected in various findings in Section 3.2 of this report.

## **Conclusion**

With respect to the first objective, the audit team found that many aspects of the management framework in place supported the effective management of staff safety in the community. CSC ensured that the internal policy requirements related to community staff safety aligned with the various legislations, including the *Canada Labour Code*. Roles and responsibilities were generally defined and understood, management was using available information for decision

making and staff safety-related training was provided and taken by those individuals working in the community.

However, the audit team identified areas where the management framework requires further improvements to better manage community staff safety. These areas of concern include:

- Lack of specificity in identifying positions responsible to oversee both the sign-in/sign-out of staff and the recording of security incidents;
- Confused perception of the role of community security intelligence officers;
- Lack of refresher training / awareness sessions related to staff safety; and
- Recurring staff safety related issues remain unaddressed.

## 3.2 Compliance with Legislation and Policy Requirements

The second objective was to provide assurance that CSC is in compliance with relevant legislation, policies and procedures when managing community staff safety.

### 3.2.1 Sharing of Offender-Related Information

We expected to find that relevant offender-related information which may affect staff safety, including the reporting of security incidents, is made available and being shared in a timely manner with the required individuals and that action is being taken as a result of this information.

The availability of accurate and up-to-date offender-related information that can impact staff safety is crucial for staff and managers who conduct offender-related duties in the community. The awareness of any risk can help them choose an adapted supervision strategy and prevent staff safety incidents from occurring.

Generally, the following was found to satisfy this criterion:

- **Relevant offender-related information was shared and/or available to assigned staff upon and after offender's release. The sharing/availability could occur through:**
  - **Case conferences with the Institutional Parole Officer prior to release (although not mandatory), or between staff members of the Case Management Team after release; and**
  - **Review of the offender's file, flags and alerts in the Offender Management System (OMS), and the Staff Safety Assessment after release.**

Management worked with the employees at the local community office to address and mitigate any concerns or risks related to safety which were raised by employees.

However, the following areas did not fully meet the audit expectations for this criterion:

***Intelligence (including security) sharing processes are not consistent and do not always provide adequate information.***

Commissioner's Directive 568-2 – Recording and Sharing of Security Information and Intelligence, defines the intelligence process as a systematic approach to the processing of information in order to develop valid inferences from available information, through the collection, evaluation, collation, analysis and dissemination of this information.

By policy, the Parole Officer Supervisors and Security Intelligence Officers are mainly responsible for assessing, recording and sharing information and intelligence as required and as such, contribute actively to the case management process. For example, in the community, the Security Intelligence Officers are to coordinate information gathering for the identification of

offenders affiliated with security threat groups and to identify new security threat groups. In addition, they are to share with staff members responsible for offender supervision any information that may affect management of the risk posed by an offender or that may affect staff or public safety. They must also sensitize staff of the importance of security intelligence and the role they can exercise in its application for case management and security purposes.

The audit team found instances where staff and managers within the community raised concerns with not having received crucial intelligence information prior to conducting supervision activities in the community. This intelligence information referred, but was not limited to, offenders involved in organized crime and security threat groups, or offenders under current investigation by police. Not receiving intelligence information could jeopardize the safety of CSC employees who conduct supervision duties of these offenders in the community.

The loss of the Community Corrections Liaison Officer (CCLO) positions was also identified as a cause of timely security intelligence information (namely information from police), not being shared. The CCLO was a dedicated police officer assigned to CSC whose primary role was to enhance information sharing between CSC and its criminal justice partners, including providing advice and support on safety matters to staff working in the community. Although not tested as part of the audit, management and security intelligence officers in the community raised concerns with the current ratio of offenders to security intelligence officers, which could impact the timely sharing of intelligence information.

Without access to up-to-date and timely intelligence information, individuals who conduct offender-related duties in the community may not fully understand the safety risks they are facing before meeting an offender, and may not adapt their supervision strategy to the risk posed in order to ensure their safety.

**Good Practice:**

*Montreal Metropolitan District in Quebec Region has created an icon on all staff's computer where they can access SIO's updated information on "hot areas" in the city, active gang activity, etc. Therefore, all staff who conduct offender-related duties in the community can access updated information when managing the risks posed by an offender.*

***Security incidents related to staff safety are not always being reported in accordance with legislation and policy.***

The *Canada Labour Code Part II* requires the employer to investigate, record and report, in the manner and to the authorities as prescribed, all accidents, occupational diseases and other hazardous occurrences known to them. Similarly, employees are expected to report to the employer anything or circumstance in a workplace that is likely to be hazardous to the health or safety of the employee, as well as every accident or other occurrence arising in the course of or in connection with the employee's work that has caused injury to the employee or to any other person.

Commissioner's Directive 568-1 – *Reporting and Recording of Security Incidents*, defines a security incident as "Any real or suspected illegal, unauthorized or disruptive activity or situation that may affect the safety of individuals, the community or the security of the institution or attract adverse media attention". A list of reportable community incidents, as per this policy, can be found under Annex C of this report. For any of these reportable incidents, policy requires that a formal incident report be completed in the Offender Management System.

The audit team conducted a file review of OMS - community incident reports that occurred between June 18, 2012 (when data became available due to changes with the incident report module in OMS) and April 19, 2015<sup>8</sup>. Over that period, 141 community security incidents were reported; of those, 47 were found to be directly compromising staff's safety in the community. The types of incidents that generated the most reporting related to staff safety were: security threats, uttering threats and disruptive behaviors of offenders.

Parole officers as well as local management in the districts stated that, in their view, not all staff safety incidents were being reported. This was found to be partially due to the fact that, in their view, it was not always clear when an incident must be reported, and what aspects were simply part of the job. For example, although parole officers understood that, by policy, a threat is a reportable security incident, their job hazard analysis states that they are likely to receive threats as part of their job, and thus stated they were unsure where to draw the line. Other reasons why incidents were not always being reported were explained as embarrassment by the staff member or a feeling that the specific issue at hand was not serious enough to require a formal incident report.

Although the number of reported incidents in the community was relatively low considering approximately 8,000 offenders being supervised, individuals were confident that safety issues were being addressed by management when they occurred. A strong and open dialogue between staff and supervisors was identified as a means to detect those situations where a staff member might not realize that their safety could be compromised, although a formal report of the incident may not occur.

### 3.2.2 Equipment

We expected to find that essential and functional equipment to ensure staff safety is provided to and used by staff who conducts offender-related duties in the community.

The *Canada Labour Code* requires the employer to ensure the provision of personal protective equipment, devices or materials, all with the goal of ensuring the health and safety of

employees; and that the vehicles and mobile equipment used by the employees in the course of their employment meet prescribed standards<sup>9</sup>. Similarly, employees are expected to use any safety materials, equipment, devices that are intended for their protection and furnished by the employer. For staff working and interacting with offenders within the community, this equipment includes cellular telephones, fixed point alarms and personal portable alarms.

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<sup>8</sup> The audit did not capture those community incidents that might have been reported into a casework record in OMS.

<sup>9</sup> Canada Labour Code part II, Paragraph 125(1)k

Overall, it was found that CSC was satisfying many aspects of this criteria including:

- **Providing sufficient equipment and ensuring that staff was using it;**
- **All staff interacting with offenders in the community were provided with cellular telephones;**
- **In most offices, fixed point alarms and personal portable alarms were available;**
- **Within Community Correctional Centres, the audit found that the use of personal portable alarms was required and enforced; and**
- **Staff felt that the equipment provided was sufficient for their role.**

Nonetheless, concerns were found regarding the effectiveness of the cellular telephone service and ensuring that personal portable alarms and fixed point alarms within parole offices were tested regularly to ensure functionality; however, given the infrequent nature of these observations, the audit team concluded that CSC has met this criterion.

***Communication equipment, including cellular and satellite telephones, provided to staff working in rural and remote areas did not always provide coverage.***

The audit team found that all staff interacting with offenders in the community were provided with, and were using, a cellular phone and/or satellite phone. The responsibility of providing cellular telephone services was managed through Shared Services Canada. While the audit team found that these devices were functional, concerns were raised relating to cellular telephone coverage in certain remote/rural areas, which could impact the ability of employees to request help or be located should an incident occur.

To mitigate this risk, in 2008, CSC launched a Community Staff Safety Initiative with the purpose of standardizing emergency response services for community staff and providing technology that offers national coverage for community staff conducting community contacts in urban and rural/remote communities. As recently as the 2016-17 Report on Plans and Priorities for CSC, the commitment remains to explore the use of technology and software to enhance the safety of community staff members.

As part of this initiative, CSC recently tested equipment in a field operational setting. The preliminary results<sup>10</sup> showed that the equipment and its features functioned properly and would address the needs of staff when they are indoors or in remote/rural areas where there is limited to no cellular coverage. However, at the current time, no final decisions have been made regarding the acquisition of this equipment and management is still exploring technological solutions to further augment staff safety.

### **3.2.3 Protocols and Procedures**

We expected to find that protocols and procedures to mitigate the safety risks when managing offenders in the community were implemented. **The audit team found that the following were compliant with expectations:**

- **Staff safety assessments were completed in accordance with policy requirements in 410/462 (88.7%) of the assessments reviewed;**
- **Although emergency response plans had not all been reviewed within the previous 12 months, the audit team found that for all sites, contingency plans existed and included specific staff safety procedures such as fail-to-return,**

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<sup>10</sup> Correctional Service of Canada *Community Staff Safety Equipment Test - Build in Canada Innovation Program-Blacklinesafety Loner Equipment - Final Results*. No date.

hostage taking and distress situations procedures. In addition, staff personal contact information was up-to-date;

- Staff was aware of the emergency procedures as they were communicated to them on a regular basis through staff meetings and when new procedures were implemented; and
- Management within the community was aware of the existence of the Employee Protection Protocol and could activate it if needed.

However, concerns were found relating to the following aspects:

***While staff were aware of the policy requirements to review the Staff Safety Assessment and document the review in a casework record, they admitted that compliance with this requirement was low.***

Commissioner's Directive 715-1 – *Community Supervision* requires that any staff member, including reintegration workers, social workers and nurses, who is meeting an offender in the community for the first time review the Staff Safety Assessment and document the review in a casework record in the Offender Management System (OMS). The audit team could not easily test whether this requirement was fulfilled.

However, through interviews, the audit team found that while individuals were aware of these requirements, interviewees acknowledged that they either did not consistently review the Staff Safety Assessment or would rarely document the review in a casework record. As these individuals could be less familiar with the offender than the supervising parole officer, the impact of not complying with this requirement could result in staff not being fully aware of the risk represented by the offender, or knowing whether tandem supervision is required.

***Some exceptions to the tandem supervision requirements were made solely based on the fact that the supervising parole officer did not meet the profile of the offender's victim(s), while not taking into consideration the safety of other staff interacting with these offenders in the community.***

Commissioner's Directive 715-1 – *Community Supervision* states that tandem supervision becomes a requirement in cases which meet one (or both) of the following criteria:

- Offenders who have a criminal history involving any sexual offence and/or death and are assessed as high risk at intake (level of intervention based on static factors); and/or
- Offenders who have a criminal history involving any sexual offence and/or death and are classified as maximum security upon release (offender security level).

This policy also allows for exceptions to be made to the necessity of using tandem supervision, thus overriding the requirement. Namely, during the initial assessment, or during the first 90 days, the Area Director can make an exception to the tandem requirements if no staff safety issues exist. Furthermore, following the initial 90 days of release, in addition to the Area Director, the Parole Officer Supervisor can also remove the tandem requirement.

The audit team reviewed 45 cases where the offender was assessed by the Parole Office as meeting tandem requirements and for whom the release date was after April 1, 2014. In 24 of these cases, the offender still had an active tandem requirement, meaning that no override had been approved by either the Area Director or Parole Officer Supervisor. For the remaining 21 cases where an exception or the removal of the tandem criteria was applied, it was confirmed that the approval to do so was made by the appropriate position, whether that be the Area

Director or the Parole Officer Supervisor.

The audit team, however, raised concerns with five specific instances where an override was approved immediately upon the offenders release to the community solely because the supervising parole officer would not meet the profile of the offender's victim(s). In all cases, the

documented justification approved the override on the basis that the offender was assigned to a male parole officer when the profile of the offender's victim(s) involved females. This override only took into account one of the staff interacting with the offender (Parole Officer). However, the override can impact the safety of other staff members interacting with the offender in the community, including social workers, mental health nurses and reintegration officers, as no tandem flag is activated in the offender's OMS file when an override occurs. Therefore, there may be an increased risk for the safety of the various staff members who may meet the profile of the offender's victim(s), as they may be unaware of the exception raised.

**To a varying degree, all sites had sign-out procedures in place; xxxxxxx, xxxx xxxx xxxxx xxx xxxxxxxxxxxx xx xxxx xxxxx xxxxx xxx xxxxxxx xxxxxxxxxxxx x xxxxxx xx xxx xxxxxxxxxxxx.**

Commissioner's Directive 715 – *Community Supervision Framework* states that all community offices are required to have a sign-in/sign-out system in place and all staff members interacting with offenders in the community are required to ensure that the system is utilized for all community case management activities. As previously stated in section 3.1.1, other than the requirement to implement a sign-in/sign-out process, no formalized direction is provided within policy prescribing what must be included or how the system should function.

The audit team found that although a sign-out process existed for all community offices visited, the process used as well as the ability to track the whereabouts of staff varied significantly between offices. Xxxx xxxxx xxxxxxx xxxxxxx xxxxx xxxxxxxxxxxxxx xxx xxxxx xxxxx xxxxx xx xxx xxxxx xxx xxxxx, xxxxx xxxxx xxxxxxxxxxx xxxxx xxxxxxxxxxx xxxxx xx xxx xxxxx xxxxxxxxxxx xxxxxxxxxxx xxx xxxxx xx xxxxxx-xx xx xxxxx xxxxxxx, xxxxx xxxxx xxxxx xxxxx xxx xxxxxxxxxxx xx x xxxxx-xxxxx xxxxxxx xxxxxxxxxxx xxxxx xxxxxxxxxxx xxx xx xxxxxxxxxxx xxx xxxxx xxx xxxxx xxxxxxx.

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While local offices may need to customize their individual sign-in/sign-out system, minimum expectations should be set to ensure the system functions as intended. The lack of an efficient sign-in/sign-out system at the local level impacts the ability of management at the community office to initiate the emergency plans in a timely manner should a staff member fail to return or otherwise be in distress.

### 3.2.4 Design of CSC Facilities within the Community

We expected to find that the design of CSC facilities within the community provided for the safe working environment of staff interacting with offenders.

The *Canada Labour Code*<sup>11</sup> requires the employer to ensure that all permanent and temporary buildings and structures meet the prescribed standards; and that employees have safe entry to, exit from and occupancy of the workplace.

Overall, the audit team found that CSC's community offices provide for a working environment where staff feels safe when conducting offender related duties. The Facility Guidelines for Parole Offices and the Community Correctional Centre Standards list many requirements of parole offices and Community Correctional Centres to allow for the facilitation of managing ongoing security and operational requirements and to provide the capacity to meet with unforeseen threats. **The audit team found compliance with many of these requirements, including:**

<sup>11</sup> Canada Labour Code Part II, Par. 125(1) a & p



- **The separation of various zones within the parole office, including reception zones and separate operational zones for both parole and for administration, to allow for the controlled movement of offenders;**
- **For all sites, special accommodation requirements were met. This included each site having controlled waiting rooms, interview space, program rooms and various closed offices to allow for meetings with offenders; and**
- **Electronic security systems required in the Community Correctional Centre Standards.**

However, the audit team found that requirements related to threat and risk assessments, as well as specific aspects of the Facility Guidelines for Parole Offices, required attention.

***Threat and risk assessments for community offices were not being completed as required by government policy.***

Threat and risk assessments provide a process to identify and qualify security-related threats, vulnerabilities and risks, to support the definition of security requirements and the identification of security controls to reduce risks to an acceptable level. The Directive on Departmental Security Management states that the external and internal environments of facilities are designed and managed to create conditions that, together with specific physical security safeguards, will reduce the risk of violence to employees, protect against unauthorized access, detect attempted or actual unauthorized access and activate an effective response. Some of the relevant aspects of a threat and risk assessment which affect staff safety include, but are not limited to: statistics on security incidents, employee safety and emergency response (contingency planning), physical security of the facility, security zones and access controls, as well as alarm systems.

In order to satisfy requirements, community facilities must have continuous and up-to-date assessments of threats and risks. In order to be up-to-date, Treasury Board states that security risk assessments must be renewed at most every three years.

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The lack of up-to-date threat and risk assessments within community facilities creates a risk that CSC may be unaware of current conditions which may jeopardize the safety of staff working within these facilities. Although this risk is known to management, the audit team found that no dedicated resources exist within the security function to complete and validate the threat and risk assessments. It must be noted, however, that staff in the community emphasized that they feel confident in their ability to speak to local management when any staff safety risk may arise, and that management would take any actions within CSC's control to mitigate the risk.

***Some requirements included within the Facility Standards for Parole Offices which affected staff safety were not met.***

CSC Facility Guidelines for Parole Offices suggest that proper interior layout and zoning of spaces are critical to both operational efficiency and security integrity of a Parole Office. Consistent with the Government's security standards, the provision of layers of security is considered a key consideration in the planning and design of parole offices.

Although the audit found that community facilities were typically arranged to meet the intent of the guidelines, the audit team found specific areas within the guidelines where non-compliance was noted.

The first area of concern related to the limited view from the reception desk. The Facility Guidelines for Parole Offices require that the staff member working at the reception area has a clear sightline of the entire controlled waiting room, and is able to fully see the entrance points to any operational zones. The audit team found that nine of the 13 parole offices visited did not provide the receptionist with a full view of the entire controlled waiting room from their respective workspace. In addition, in four of the 13 parole offices, the receptionists could not see all the entrances to the operational zones from their workspace. These requirements exist to allow for the receptionist to observe the offender and other visitors as well as ensuring that public access to operational zones is limited.

A second area of concern related to the impeded egress of staff in some rooms, should their safety be compromised. The Facility Guidelines for Parole Offices state that the configuration of those rooms and their furnishings must facilitate safe exit by the staff, should it be required. The audit team found that, for the vast majority of individual parole officer offices, 70% (29/41) were configured with the offender sitting between the parole officer and the door. While this was raised as a concern with staff in the community offices, the audit team found that employees chose to lay out the office to improve privacy of information as well as not to impede the easy exit of an offender should the offender become agitated. To mitigate this risk, the audit team found that for two of the parole offices visited, staff did not meet offenders in their individual offices and instead used the common interview space available.

## Conclusion

For the second audit objective, the audit team found strong compliance with many of the CSC's policies and procedures. Some of these areas included the completion of staff safety assessments, strong communication practices at the local levels between management and employees to discuss staff safety concerns, awareness of the relevant emergency procedures and design of community facilities as per the standards.

However, the audit found a number of areas where the CSC could improve in order to comply with relevant legislation and policies, in terms of community staff safety. Some of these areas include:

- Reporting and disseminating all security incidents affecting staff in the community to assist management in addressing risk to staff;
- Clarifying requirements related to the sign-in/sign-out system to ensure management knows that staff is safe;
- Ensuring that the layout of all parole offices allows for full line of sight of the waiting and operational zones and the provision of a safe egress for staff should an emergency occur; and
- The regular conduct and review of Threat and Risk Assessments for community offices to identify ongoing staff safety threats.

### Recommendation 1

The Assistant Commissioner, Human Resource Management, should ensure that an effective governance mechanism is in place to provide staff with a forum to bring legitimate community safety concerns to the attention of management. The Assistant Commissioner, Correctional Operations and Programs, should ensure that community staff safety issues are addressed in a timely manner.

### Management Response

We agree with this recommendation. By March 31, 2017, the Assistant Commissioner, Correctional Operations and Programs will:

- Work in conjunction with Assistant Commissioner, Human Resource Management to ensure a comprehensive governance structure; and
- Reinforce the process by which staff will report community staff safety incidents.

### Recommendation 2

The Assistant Commissioner, Correctional Operations and Programs should ensure that processes are augmented to allow for a more effective sharing of intelligence information, including clarification of the roles of the Security Intelligence Officers.

### Management Response

We agree with this recommendation. By March 31, 2017, the Assistant Commissioner, Correctional Operations and Programs will:

- In consultation with Assistant Deputy Commissioners, community management and Security Intelligence Officers (SIOs), the Preventive Security and Intelligence (PSI) division will develop a mechanism (i.e., reporting template) by which community SIOs can effectively share pertinent intelligence with district management (including District Directors, Associate District Directors, and Area Directors) during mandated [monthly] Local Strategic Intelligence Committee meetings (LSICs). This intelligence will be shared with front-line supervisory staff, as appropriate; and
- Ensure Security Intelligence Analysts (SIAs) provide monthly reports to community SIOs that list offenders being released to their respective Districts (by Area Office) in the upcoming calendar month, and that detail pertinent intelligence links for each offender therein.

### Recommendation 3

The Assistant Commissioner, Correctional Operations and Programs should examine training and awareness opportunities to ensure that all staff working in the community are up-to-date and well informed on existing and emerging risks so they can effectively identify and resolve situations which may jeopardize their safety.

### Management Response

We agree with this recommendation. By June 30, 2017, the Assistant Commissioner, Correctional Operations and Programs will:

- Review staff training in Human Resource Management Systems (HRMS) to optimize completion rates;
- Implement Parole Officer Continuous Development (POCD) with modules addressing Radicalization and Security Threat Groups; and
- Examine the feasibility of developing and delivering a Community Staff Safety Refresher

training.

#### Recommendation 4

The Assistant Commissioner, Correctional Operations and Programs should review and strengthen current policy requirements around the sign-in/sign-out mechanism to ensure the safety of staff while they are interacting with offenders in the community.

The Regional Deputy Commissioners should review the current sign-in/sign-out mechanism being used at the local level to ensure that continuous monitoring occurs to validate that all staff use the system when interacting with offenders in the community and should ensure that the mechanism in place is updated concurrently as the policy requirements are strengthened.

#### Management Response

We agree with this recommendation. By December 31, 2017, the Assistant Commissioner, Correctional Operations and Programs will:

- Review Commissioner's Directive 715 – Community Supervision Framework; and
- Explore new technology to ensure monitoring and communications are effective/sustainable in all locations to support sign-in/sign-out processes.

The Regional Deputy Commissioner Atlantic agrees with this recommendation. By October 14, 2016, the Regional Deputy Commissioner Atlantic will:

- Develop a consistent approach to the recording and quality control of the sign-in/sign-out mechanism, as well as conduct compliance checks on a quarterly basis.

The Regional Deputy Commissioner Prairies agrees with this recommendation. By December 31, 2016, the Regional Deputy Commissioner Prairies will:

- Develop a plan for validation of staff use and follow-up to occur for each of the following areas: Aboriginal Initiatives, Health Services, CORCAN and Case Management Team; and
- Ensure District Director, Regional Administrator Aboriginal Initiatives, Regional Director, Health Services and CORCAN Operations attest to the validation and staff follow-up process, to be submitted to Regional Administrator, Assessment and Intervention on a quarterly basis.

The Regional Deputy Commissioner Pacific agrees with this recommendation. By November 1, 2016, the Regional Deputy Commissioner Pacific will:

- Validate that all staff are using the system.

The Regional Deputy Commissioner Quebec and Regional Deputy Commissioner Ontario mentioned having a consistent process in place to support the monitoring of Parole Officers; consequently no action will be taken.

**Recommendation 5**

The Assistant Commissioner, Correctional Operations and Programs, in collaboration with the Assistant Commissioner, Corporate Services and the Regional Deputy Commissioners, should ensure that facility related concerns are identified and addressed. Some identified areas of concern include:

- The Threat and Risk Assessments, including the aspects related to staff safety, are not being completed, and thus not reassessed as required by policy;
- Waiting rooms and entry to operational zones do not ensure that administrative staff have a full line of sight; and
- Individual Parole Officer offices, program rooms and interview spaces do not consistently allow for the safe egress of staff should an incident occur.

**Management Response**

We agree with this recommendation. By March 31, 2018, the Assistant Commissioner, Correctional Operations and Programs will ensure:

- Regional Deputy Commissioners conduct Threat and Risk Assessments of all CSC community facilities and submit to Departmental Security Division while ensuring that recommendations are made and implemented to address staff safety issues.

## 4.0 CONCLUSION

Overall, the audit demonstrated that CSC has made significant progress over the years in providing a safe working environment for staff members interacting with offenders in the community. This fact was evident not only from the relatively low number of reported safety incidents, but also from the positive opinions made by staff towards the support that they receive from their direct supervisors.

With respect to the first objective related to the management framework, the audit team found that it generally supports the safety of staff working in the community. The audit did, however, note a few areas where attention is needed to ensure that CSC promotes a safe working environment for these employees.

The second objective of this audit focused on compliance with CSC's policies as well as specific legislation. For the most part, the audit found a number of areas with a high rate of compliance. Nonetheless, there were a few identified areas where improvements should be made.

Management has agreed to take action in response to recommendations made to address the areas for improvement.

## 5.0 MANAGEMENT RESPONSE

Management agrees with the audit findings and recommendations as presented in the audit report. Management has prepared a detailed Management Action Plan to address the issues raised in the audit and associated recommendations. The Management Action Plan is scheduled for full implementation by March 31, 2018.

## 6.0 ABOUT THE AUDIT

### 6.1 Approach and Methodology

Audit evidence was gathered through a number of methods such as: review of documentation; detailed testing and interviews with staff at NHQ and in the Regions.

**Interviews:** 115 interviews were conducted with community staff and managers across the country, including Parole Officers, Parole Officer Supervisors, CCC Managers, Program Officers, Community Reintegration Officers, Case Management Assistants, Security Intelligence Officers, Health Services Staff, District Directors, Area Directors and other staff who are in contact with offenders in the community. Interviews were conducted via videoconferences and teleconferences, specifically to speak to parole officers working at small, sub and satellite parole offices. In addition, interviews were conducted with ACOCSS members who are representing their regions and districts at the ACOCSS Committees.

**Review of Documentation:** Relevant documentation including Federal Legislation such as *CCRA*, *Canada Labour Code* and *Canada Health and Safety Regulations*, Treasury Board policies, Commissioner's Directives, standards and guidelines related to the management of community staff safety were reviewed to determine compliance. In addition, meeting minutes from various committees including ACOCSS and National Joint Council Occupational Health and Safety Policy Committee were examined as well as reported community security incidents from a variety of sources.

**File Reviews:** Review of information from the Offender Management System (OMS) for 302 individual offenders. This included casework records, flags and alerts for tandem supervision and various reports including staff safety assessments were conducted in order to determine compliance and effectiveness. A random sample was chosen from the overall population of offenders in the community, with ratios of 10 files in CCCs, 12 files in small and medium parole offices and 18 files in large parole offices. To further augment the sample, the audit team chose, from a targeted sample, up to five additional files with tandem flags and up to five additional files with a staff safety alert.

In addition, local methods to track sign-in/sign-out procedures, as well as other local procedures in place to ensure staff safety such as emergency procedures and business continuity plans, were audited to determine compliance with the policy requirements. Finally, the audit team also looked at training records maintained in the Human Resources Management System (HRMS) to assess staff compliance with National Training Standards related to community staff safety.

**Observations:** Observations were conducted at each Parole Office and Community Correctional Centre visited to determine whether relevant Commissioner's Directives, standards and guidelines were being followed. Specifically, examination of effectiveness of equipment and designs of facilities at each site identified areas of weakness and non-compliance with the site management of staff safety. In addition, the work of the ACOCSS was observed.

## 6.2 Past Audits on Management of Community Staff Safety

Past CSC internal audits and evaluation work were used to assist in scoping the audit work.

### **Audit of Staff Safety in the Community (2007)**

In 2007, the Internal Audit Sector conducted an audit on staff safety in the community. The objectives of the audit were to:

- Assess the progress made by CSC in addressing the BOI's recommendations that were specific to community operations;
- Assess the progress made by operational sites to implement the measures to strengthen staff safety in the community; and
- Determine if the assessment of staff safety was considered while managing the offender's risk in accordance with the community supervision policy requirements.

While the audit found that CSC's National Headquarters had made significant progress and had acted upon many of the recommendations issued in the BOI, some issues regarding compliance with procedures were found at the site level. Ten recommendations were issued by the audit team and management has attested that they have all been implemented.

Areas of concern have been included in the risk assessment of this audit.

### **Audit of Community Supervision (2010)**

The objectives of this audit were to provide reasonable assurance that the management framework in place supported the effective supervision of offenders in the community and that CSC was complying with relevant legislation and policy directives with regards to the supervision of offenders in the community.

Overall, the audit showed that attention was required in the following areas related to community staff safety:

- Need for a review of the Commissioner's Directives surrounding tandem supervision, including the criteria for tandem supervision;
- Need to ensure that parole officers are compliant with the training requirements as stated in the National Training Standards; and
- Staff safety assessments to be completed in accordance with the Commissioner's Directives.

Two recommendations were made to address these issues. Management stated that all of these recommendations have since been implemented.

### **Audit of Security Incidents (November 2014):**

The objective of this audit, as it relates to the current audit, was to ensure that institutions were prepared to manage a security incident should one arise and to ensure that all incidents were being reported as required.

Overall, the audit found that institutions were discussing individual security incidents which occurred at the institutions. However, with few exceptions, formal documented analysis of trends using the reported security incidents data was not occurring. It was recommended that the Assistant Commissioner, Correctional Operations and Programs (ACCOP) should enhance CSC's monitoring and reporting capabilities by ensuring that the security incidents data



captured in Performance Direct and/or other systems was being analyzed to ensure more consistency in the reporting of security incidents between sites and regions and to identify, share information and take action on any emerging trends to assist the institutions in preventing and managing security incidents.

This recommendation was agreed to by the Office of the Primary Interest and two actions were initiated as a result of this recommendation. The first action was for the National Monitoring Centre to commence a pilot project to further enhance the tracking and analysis on reported incidents; this action was progressing as planned as of December 2014.

The other action was for the Security Branch to revise Commissioner's Directive 568-1 – *Reporting and Recording of Security Incidents*, to ensure more precision around recording and reporting of security incidents. While this update has not yet taken place, a Policy Bulletin has since been promulgated to streamline the sharing of certain incidents and strengthen the consistency in the reporting of security incidents from the sites to the National Monitoring Centre.

### **Evaluation of Community Correctional Operations (2009-2012)**

In 2009, the Evaluation Branch commenced a multi-year evaluation to assess the relevance and performance of CSC's community corrections operations. The evaluation was structured in four chapters with Chapter 2, completed in 2012, being closely linked to the current audit.

In Chapter 2: *Community Supervision Strategies and Staff Safety*, the evaluation team found that although staff (including non-parole officers) perceived some threats to safety in the community, the majority of parole officers were not concerned with safety, as they reported that tandem supervision and the use of technology enhanced their community staff safety. However, changes to the tandem supervision criteria and policy and the use of technology were suggested by staff.

In relation to training, it was noted that staff safety training was provided in a timely manner to those who required it. However, some staff indicated that they would benefit from more frequent staff safety refresher training.

They also found that while initial staff safety assessments were largely completed in accordance with policy, staff safety re-assessments for tandem supervision cases were not consistently conducted within the required 90 day timeframe.

While no specific recommendations were made to address these areas of concern, we nevertheless included them in our risk assessment exercise in the present engagement.

### 6.3 Statement of Conformance

In my professional judgment as Chief Audit Executive, sufficient and appropriate audit procedures have been conducted and evidence gathered to support the accuracy of the opinion provided and contained in this report. The opinion is based on a comparison of the conditions, as they existed at the time, against pre-established audit criteria that were agreed on with management. The opinion is applicable only to the area examined.

The audit conforms to the Internal Auditing Standards for Government of Canada, as supported by the results of the quality assurance and improvement program. The evidence gathered was sufficient to provide senior management with proof of the opinion derived from the internal audit.

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Sylvie Soucy, CIA  
Chief Audit Executive

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Date

## GLOSSARY

**Authorized Tandem Partner:** Any CSC staff member, Peace Officers (including Police Officers, Provincial Probation/Parole Officers, and the Community Corrections Liaison Officer in locations where one is in place), Community Assessment and Parole Supervision (CAPS) contractors and individuals authorized by the District Director by name. These persons must have a valid reliability status and have been briefed on the offender's criminal history and case dynamics as they relate to staff safety risk factors.

**Blacklinesafety Loner Equipment:** The Loner 900/Loner Bridge System is a real-time safety monitoring solution for employees in remote locations. It combines several technologies together such that the safety of personnel can be monitored regardless as to whether an employee is indoors or outdoors. It is comprised of two parts: 1) Person-worn device and 2) Portable satellite and cellular base bridge station.

**Case Conference:** A formal meeting, consultation or discussion about an offender between two or more individuals.

**Community Correctional Centre:** A federally operated community-based residential facility that provides a structured living environment with 24-hour supervision, programs and interventions for the purpose of safely reintegrating offenders into the community. These facilities, which may also have an enhanced programming component, accommodate offenders under federal jurisdiction who have been released to the community on unescorted temporary absences, day parole, full parole, work releases, statutory release, as well as those subject to long-term supervision orders.

**Community Supervision Contact:** Any supervision contact with the offender in the community.

**Exception for Tandem Supervision:** The Area Director's authority to suspend the application of tandem supervision for offenders identified as meeting the established tandem supervision criteria, at the recommendation of the Case Management Team.

**Fixed-Point Alarm:** A permanently installed security device that triggers an alarm when activated.

**Interview Room:** While most interviews at the Parole Office will occur in the Parole Officer's office, it will be necessary to use the interview rooms in a number of situations, including unscheduled or potentially volatile visits. It is essential to the security of the office that these take place at the periphery / entry area in a secure and observable location. The configuration of the interview room and its furnishings must facilitate safe egress by the Parole Officer, should such be required. The interview room should only be accessible through the Controlled Waiting Room.

**Intimidation:** System coercing a person by unlawful threats into doing or abstaining from doing something that he would otherwise have every right to do.

**Intrusion Detection Alarm System:** System designed to detect unauthorized access and to activate appropriate responses from: a central alarm station that centralizes information sent by the detectors and decides to launch the alarm, detectors, a device (siren, call system) designed to sound the alarm, control devices (remote control, keyboard) from which users can activate or deactivate the system.

**Operations Zone – Parole:** This zone includes offices for all staff who deal directly with the offender, including Parole Officers, Psychologists and Program Deliverers. It is a designated consultation and work environment located adjacent to the Reception Zone and a designated space for urinalysis collection and storage. Activities in this area are often of a confidential or

protected nature, thereby requiring controlled entry and the use of enclosed offices within. Offenders are escorted from the Reception Zone to individual offices.

**Operations Zone – Administration:** This zone provides a controlled environment for administrative staff and related activities that require additional security and separation and may be working with protected or sensitive materials. The Operations Zone – Administration is a defined area with a secure and controlled perimeter. Activities, information and assets within this zone are of a highly sensitive and protected nature, thereby requiring that access to this area be restricted to authorized staff only.

**Personal Portable Alarm:** A mobile security device that triggers an alarm at a central control centre when activated, and identifies the specific alarm unit and/or its designated location.

**Program Room:** The *Corrections and Conditional Release Act (CCRA)* requires the provision of programs designed to address the needs of offenders both while incarcerated and when under supervision in the community. Community-based programs are typically specialized, being directed towards a correctional orientation. As a result they are not typically available in the community, requiring delivery within the Parole Office. Programs are delivered to group sizes from four to twelve. While the frequency and duration of each program varies, offenders generally attend only one program at a time. This requirement, which involves after-hour access, can only be met through the provision of a dedicated space within each Parole Office. This space is approved as a special purpose space by Public Works and Government Services Canada.

**Reception Zone:** Located at the primary entry to the Parole Office, where initial contact between staff and other individuals (offenders, members of the public, contractors, agency representatives, etc.) occurs. Access to other areas of the office is restricted and controlled at this point by means of a Controlled Waiting Area. The Reception Zone includes restricted access to program and interview spaces, avoiding the need to enter into the operational zones, particularly during evening hours use.

**Staff:** Unless otherwise noted in the report, staff refers to parole officers, reintegration officers, program officers, mental health nurse, clerical staff, etc.

**Staff Safety Assessment:** Tool designed to enhance and promote consideration of several variables in determining whether or not staff safety issues are present and whether these issues require alternative supervision strategies or tandem supervision.<sup>12</sup>

**Tandem Partner:** Refers to the second individual authorized by policy or the District Director to complete tandem supervision.

**Tandem Supervision Criteria:** Tandem supervision becomes a requirement in cases which meet one (or both) of the following criteria:

- Offenders who have a criminal history involving any sexual offence and/or death and are assessed as high risk at intake (level of intervention based on static factors); and/or
- Offenders who have a criminal history involving any sexual offence and/or death and are classified as maximum security upon release (offender security level).

**Threat:** Any direct or indirect act, or expression of intent, to inflict physical or other harm against someone. A threat can be spoken, written or symbolic (e.g., motioning with one's hand to mimic a gun, or mimicking a threat with a knife by sliding a finger across the throat).

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<sup>12</sup> Tool for Commissioner's Directive 715-1: *Reference Document Staff Safety Assessment – Intent of offender and environmental factors*

**Violence in the Workplace:** Any action, conduct, threat or gesture of a person towards an employee in their workplace that can reasonably be expected to cause harm, injury or illness to that employee<sup>13</sup>.

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<sup>13</sup> Canada Labour Code, Part XX

## ANNEX A: AUDIT CRITERIA

The following table outlines the audit criteria developed to meet the stated audit objective and audit scope:

Objective	Audit Criteria	Met/ Partially Met/ Not Met
Provide assurance that the management framework is in place to support community staff safety.	1.1 – Policies and directives are in place to define and support the management of community staff safety and are consistent with relevant legislation and Treasury Board policies.	Partially met
	1.2 – Roles and responsibilities are clearly defined, communicated and understood with regards to community staff safety.	Partially met
	1.3 – Management is using the available information on community staff safety for decision-making.	Partially met
	1.4 – National Training Standard courses related to staff safety are being provided to and taken by staff working in the community.	Met
Provide assurance that CSC is in compliance with relevant legislation and policies related to the management of community staff safety.	2.1 – Relevant offender related information which may affect staff safety, including the reporting of security incidents, is being shared with the required individuals and action taken.	Partially met
	2.2 – Essential equipment to ensure staff safety is provided to and used by staff in the community.	Met
	2.3 – Protocols and procedures to mitigate the safety risks when managing offenders in the community are developed, shared and implemented.	Partially met
	2.4 – The design of CSC facilities within the community provides for the safe working environment of staff interacting with offenders.	Partially met

## ANNEX B: SITE SELECTION

Region	Sites
<b>Atlantic</b>	Halifax Parole Office St. John's Parole Office Newfoundland and Labrador CCC
<b>Quebec</b>	Ville-Marie Parole Office CCC Martineau Lanaudière Parole Office Outaouais Parole Office
<b>Ontario</b>	Kingston Parole Office Henry Trail CCC Brantford Parole Office Toronto West Parole Office
<b>Prairies</b>	Calgary Parole Office Red Deer Parole Office Regina Parole Office Oskana CCC
<b>Pacific</b>	Vancouver Parole Office Surrey Parole Office

## ANNEX C: REPORTABLE COMMUNITY INCIDENTS<sup>14</sup>

Immediate	One Working Day	Three Working Days
All deaths (natural causes, unknown causes, and suicide)	Any minor disturbance in a parole office, Community Correctional Centre or Community Residential Facility	Breach of Treasury Board Policy on Government Security
Any incident involving serious bodily injury of an offender occurring in a Community-Based Residential Facility	All other incidents related to staff/volunteer/contractor safety (other than incidents which place staff at immediate risk)	Damage to government property
Any incident where staff/volunteer/contractor safety has been put at immediate risk and which requires police involvement (see Employee Protection Program)		
Any incident which has the potential to attract or has attracted significant media and/or ministerial attention		
Attempted suicide		
Hostage taking, forcible confinement, forcible confinement with sexual assault		
Incident with significant police involvement		
Information technology related incident (for more details regarding procedures to follow, please refer to Commissioner's Directive 225 – Information Technology Security and Commissioner's Directive 226 – Use of Electronic Resources)		
Major disturbance in a CSC facility/workplace, parole office, Community Correctional Centre, and/or Community Residential Facility		
Murder or attempted murder by or of an offender		

<sup>14</sup> As per Commissioner's Directive 568-1 – *Reporting and Recording of Security Incidents*