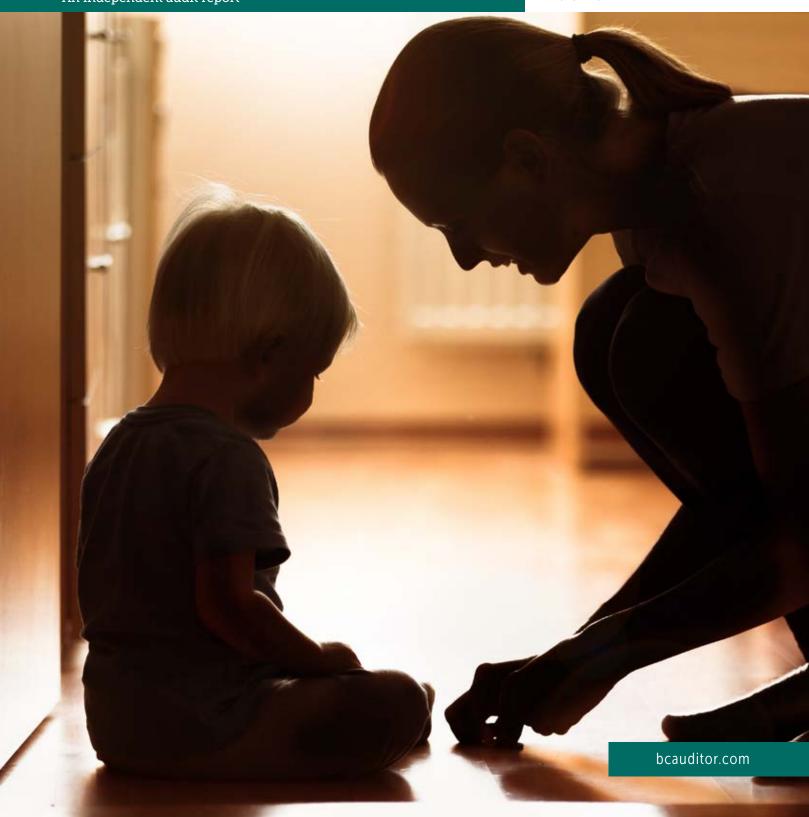


# BC Housing's COVID-19 Response: Additional Safe Spaces for Women and Children Leaving Violence

An independent audit report

March 2022





623 Fort Street Victoria, British Columbia Canada V8W 1G1 P: 250.419.6122 F: 250.387.1230 www.bcauditor.com

The Honourable Raj Chouhan Speaker of the Legislative Assembly Province of British Columbia Parliament Buildings Victoria, British Columbia V8V 1X4

Dear Mr. Speaker:

I have the honour to transmit to the Speaker of the Legislative Assembly of British Columbia the report: *BC Housing's COVID-19 Response: Additional Safe Spaces for Women and Children Leaving Violence.* 

We conducted this audit under the authority of section 11(8) of the *Auditor General Act*. All work in this audit was performed to a reasonable level of assurance in accordance with the Canadian Standard on Assurance Engagements (CSAE) 3001—Direct Engagements, set out by the Chartered Professional Accountants of Canada (CPA Canada) in the *CPA Canada Handbook—Assurance*.

Michael A. Pickup, FCPA, FCA

Auditor General of British Columbia

Victoria, B.C.

March 2022

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The Office of the Auditor General of British Columbia acknowledges with respect that we conduct our work on Coast Salish territories, primarily on the traditional lands of the Lekwungen-speaking people (Esquimalt and Songhees Nations) and the WSÁNEĆ people (Pauquachin, Tsartlip, Tsawout, Tseycum First Nations).



#### Why we did this audit

- COVID-19 made it harder for women and children who lived in unstable or violent situations
  where home was not a safe place. In times of crisis, like the pandemic, domestic violence
  can increase.
- Transition housing provides safe spaces, support services, and other help for women and children leaving violence.
- When COVID-19 protocols limited the capacity of transition housing, BC Housing provided additional safe spaces across the province.

#### **Objective**

To determine whether BC Housing effectively managed the provision of additional safe spaces for women and children leaving violent or unstable situations during the COVID-19 pandemic.

#### **Audit period:**

April 1, 2020 – September 30, 2021

#### **Conclusion**

We concluded that BC Housing effectively managed the provision of additional safe spaces for women and children leaving violent or unstable situations during the COVID-19 pandemic, with some exceptions. We found gaps in BC Housing's response to providers' needs and the collection and use of data.

To help BC Housing respond to other situations where additional space is needed, we made four recommendations focused on:

- confirming the staffing needs of all transition housing providers,
- ensuring hotel and motel operators comply with lease agreements,
- monitoring whether additional spaces are accessible to all women,
- responding to limitations of data on women turned away due to insufficient space.

BC Housing has accepted all four recommendations.

#### What we found

Baseline inventory used to determine initial space needs

- Transition housing information included occupancy levels and number of:
  - spacesbedroomsbathrooms
- Inventory information used to decide how many additional spaces to lease.





**Transition** housing providers supported, but improvements needed

- Cleaning supplies and personal protective equipment were provided, along with funds for food.
- Needs of providers considered when selecting spaces to lease.
- No assessment of staffing needs despite known shortages.
- No process to ensure hotels and motels complied with lease agreements and held rooms leased to BC Housing.

#### **RECOMMENDATIONS 1, 2**

Aimed to provide spaces to all women, but more monitoring needed

- Data collected included ethno-cultural information.
- Lack of data on:
  - physical ability
- mental wellness
- religious beliefs

- sexual orientation
   gender identity

#### **RECOMMENDATION 3**

#### Additional safe spaces tracked

Data collected on the number, location, and use of additional spaces.

#### Adjustments made, but better data needed

- Number of rooms adjusted based on occupancy levels and consultation with transition housing providers.
- Didn't allocate rooms based on information about women turned away due to lack of space.

#### **RECOMMENDATION 4**

After reading the report, you may wish to ask the following questions of government:

- 1. How will government work with transition housing providers to address gaps in staffing capacity?
- 2. How will government ensure that spaces are accessible and inclusive?
- 3. How will government work with transition housing providers to respond to women and children turned away because of insufficient space?

# **Background**

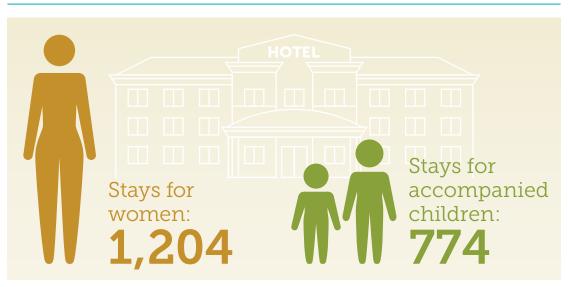
Many women in British Columbia face violence and in times of crisis, such as the COVID-19 pandemic, levels of domestic violence can increase. Several factors can contribute to increased domestic violence including job loss, income instability, and social isolation.

Women and children affected by domestic violence often require complex support. Women living in these situations are more likely to be at risk from repeated and increasingly severe violence, and their children are also seriously affected.

Domestic violence includes physical, emotional, economic, financial, sexual, spiritual, or gender-based violence.

BC Housing's Women's Transition Housing and Supports Program assists women, with or without children, who are at risk of violence or have experienced violence. The program funds and supports more than 100 transition housing sites across the province that offer temporary housing, front-line support services, referrals to community services, and assistance in planning next steps. BC Housing's 2020/21 operating cost for the program was \$45.6-million – this excludes all COVID-19-related expenses, including the cost of leasing the additional spaces. Costs related to the additional spaces were tracked as part of BC Housing's overall response to COVID-19, and were not part of the Women's Transition Housing and Supports Program's operating cost.

#### NUMBER OF STAYS IN ADDITIONAL SAFE SPACES (APRIL 1, 2020 - SEPT. 30, 2021)



One "stay" is a minimum of one or more consecutive nights in a safe space. If a woman leaves and comes back, that is considered a new stay.

SOURCE: BC Housing

On March 18, 2020, the B.C. government declared a provincial state of emergency due to the COVID-19 pandemic. The provincial health officer recommended that organizations, including transition housing providers, adapt for physical distancing and provide space for self-isolation to reduce virus transmission.

In April 2020, BC Housing started securing additional safe spaces for transition housing providers to use during the pandemic. These additional safe spaces were mostly located in hotel and motel rooms leased by BC Housing and funded through the Province's \$5-billion Pandemic Contingencies Fund. The federal government also provided funding to help housing providers prevent or manage COVID-19 outbreaks in women's shelters and sexual assault centres.

BC Housing undertook its work to provide safe spaces for women and children during an unprecedented time, with the COVID-19 pandemic presenting unique challenges for the organization and transition housing providers.



# **Objective**

The objective of the audit was to determine whether BC Housing effectively managed the provision of additional safe spaces for women and children leaving violent or unstable situations during the COVID-19 pandemic by:

- evaluating whether it provided additional spaces to meet service needs, and
- reviewing the processes BC Housing had in place to monitor and report its ongoing provision of additional safe spaces.

#### Scope

The audit focused on BC Housing's management of its provision of additional safe spaces from April 1, 2020, to Sept. 30, 2021.

BC Housing's Women's Transition Housing and Supports Program is responsible for this area. The program's goals are to provide safe, secure, and confidential services which include short-term shelter or housing for women and children at risk of violence, or who have experienced violence.

We did not assess the work of the transition housing providers or whether the additional spaces leased by BC Housing met the needs of women and children leaving violence.

Learn more about the audit criteria.

Learn more about how we did this audit.

# Conclusion

BC Housing effectively managed the provision of additional safe spaces for women and children leaving violent or unstable situations during the COVID-19 pandemic, with some exceptions.

Many of the operational needs of housing providers were met, and processes were in place to monitor and report on its provision of additional spaces, however we found gaps in BC Housing's response to providers' needs, and the collection and use of data.



# **Findings and recommendations**

### **Initial response**

In March and April 2020, BC Housing started working with transition housing providers to determine how much additional space they needed to meet physical distancing requirements and provide space for self-isolation and quarantine. Most transition houses are communal living spaces with shared bathrooms and living areas, making it difficult for residents to self-isolate or quarantine.

#### Baseline inventory used to determine initial space needs

#### What we looked for

We assessed whether BC Housing used baseline inventory information to determine the initial space needs created by the COVID-19 pandemic. We specifically looked at whether BC Housing used information on the number of spaces available at each transition site, including the number of bedrooms and bathrooms, and occupancy levels.

Learn more about the audit criteria.

#### What we found

At the onset of the pandemic, BC Housing used baseline inventory information to help determine initial space needs. BC Housing also worked with transition housing providers to estimate the number of additional spaces required.

BC Housing had a record of baseline inventory information on the number of spaces in each transition housing site. BC Housing supplemented this inventory with information provided by transition housing providers, including the number of bedrooms and bathrooms, occupancy levels when shelters were required to reduce capacity, and space available to support self-isolation and quarantine. BC Housing used all this information to determine the initial number of rooms it leased for transition housing providers.

#### Why this matters

Having baseline inventory and other information collected from transition housing providers allowed BC Housing to estimate the number of additional spaces needed.

#### **Providers' needs**

BC Housing supported transition housing providers during the COVID-19 pandemic by providing additional safe spaces to house women and children leaving violence. Most of these spaces were leased hotel and motel rooms across the province. To operate these spaces, housing providers needed staff to support residents and funds to supply food. Providers also needed personal protective equipment and cleaning supplies to help keep staff and residents safe. To provide these services, transition housing providers often required funding beyond their existing program budgets.

# Transition housing providers supported, but improvements needed

#### What we looked for

We assessed whether BC Housing provided additional safe spaces in response to the service needs identified by transition housing providers during the COVID-19 pandemic and whether BC Housing met the operational needs of transition housing providers.

Learn more about the audit criteria.

#### What we found

BC Housing provided additional safe spaces in response to the service needs identified by transition housing providers during the COVID-19 pandemic, but some improvements were needed.

BC Housing met many of the operational needs of housing providers. It supplied funding to housing providers for additional food costs associated with housing women and children in hotel or motel rooms. When transition housing providers were having difficulties getting supplies such as personal protective equipment and cleaning products, BC Housing set up an online request system and distributed supplies directly to housing providers.

In addition, BC Housing considered the needs of transition housing providers when selecting hotels or motels, including the types of rooms to lease, whether the properties had 24-hour staffing, cameras and other security measures, and elevators for accessibility. BC Housing also considered housing providers' needs for larger units with kitchenettes, units with adjoining rooms, and avoiding ground floor units.

While BC Housing responded to many of the operational needs identified by housing providers, we found it did not assess the overall staffing needs of the housing providers. Instead, BC Housing considered funding requests on a case-by-case basis despite known staffing shortages due to illness, lack of child care, and the increased workloads associated with COVID-19, such as cleaning. For example, one of the transition housing providers explained that they were too busy responding to the operational challenges of the COVID-19 pandemic to submit requests to BC Housing. Three of the 12 transition housing providers we interviewed spoke about the staffing shortages they experienced during the pandemic.

We also learned of instances at three hotels where housing providers needed rooms that had been leased to BC Housing but couldn't use them because the hotel operators had rented them out to others. BC Housing had lease agreements with the hotel operators that specified its exclusive use of the rooms. We found that BC Housing didn't have a process to ensure hotel and motel operators fulfilled these agreements. Instead, BC Housing only followed up with operators when transition housing providers were unable to access rooms.

#### Why this matters

Adequate staffing was necessary for transition housing providers to support women and children staying in additional safe spaces. It was important that hotel and motel operators held the rooms leased to BC Housing so that these spaces were available when needed for women and children leaving violence.

#### Recommendations

- 1 We recommend BC Housing confirm the staffing needs of all transition housing providers when offering resources to operate additional spaces.
- We recommend BC Housing implement a process to support hotel and motel compliance with lease agreements to help ensure rooms are held for BC Housing's exclusive use.

See the response from the auditee.

## **Accessibility and inclusion**

BC Housing's agreements with transition housing providers required that "all women and their dependent children, who are at risk of violence or have experienced violence and who require services related to their risk or experience of violence are eligible for program services regardless of ethno-cultural background, religious beliefs, physical ability, health, mental wellness, social context, sexual orientation and/or gender identity."

# BC Housing aimed to provide spaces to all women, but more monitoring needed

#### What we looked for

We assessed whether BC Housing sought to provide additional safe spaces to all women irrespective of ethno-cultural background, religious beliefs, physical ability, health, mental wellness, social context, sexual orientation, and/or gender identity.

Learn more about the audit criteria.

#### What we found

BC Housing sought to provide additional safe spaces to all women irrespective of ethno-cultural background, religious beliefs, physical ability, health, mental wellness, social context, sexual orientation, and/or gender identity, however, it lacked some monitoring information in this area.

Pre-pandemic agreements between BC Housing and transition housing providers – as well as agreements specific to the operation of additional safe spaces during the pandemic – required that all women be eligible to access safe spaces.

BC Housing collected data from transition housing providers about the women staying in additional spaces, including ethno-cultural background, Indigenous identity, COVID-related health concerns, and whether the women were experiencing homelessness (either before or after leaving). BC Housing data showed that between April 1, 2020 and Sept. 30, 2021, additional safe spaces were accessed by women who identified as white, Indigenous, Asian, Canadian, European, Black, and other.

However, BC Housing did not collect data on physical ability, mental wellness, religious beliefs, sexual orientation, or gender identity, and therefore, could not monitor whether the additional safe spaces were provided irrespective of those factors.

#### Why this matters

There is a risk that additional safe spaces were not accessible to some women leaving violence. Without monitoring all categories, BC Housing may not be aware of instances where women were turned away due to physical ability, mental wellness, religious beliefs, sexual orientation, or gender identity. For example, we learned through an interview with a housing provider of an instance where leased rooms were not accessible to women with mobility constraints.

#### Recommendation

**3** We recommend that BC Housing work with transition housing providers to implement a process to monitor whether additional spaces are accessible to all women as specified in the service agreement.

See the response from the auditee.



## Monitoring, adjusting, and reporting

BC Housing committed to monitoring and reporting the additional safe spaces to promote public accountability for its response to the pandemic. BC Housing also noted that its monitoring information helped to inform decisions about the program and will help with future emergency planning.

#### BC Housing tracked the additional spaces

#### What we looked for

We assessed whether BC Housing tracked the number, location, and use of the additional safe spaces to determine if spaces were secured where and when they were needed.

Learn more about the audit criteria.

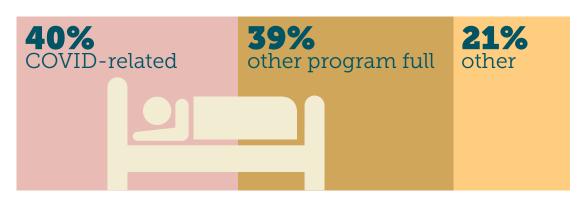
#### What we found

BC Housing tracked the number, location, and use of additional safe spaces over time to determine if spaces were secured where and when needed.

BC Housing used an internal spreadsheet to track the number and location of additional safe spaces. To track the use of the additional safe spaces, BC Housing collected information from transition housing providers on the number and length of stays, as well as the reason for placing women and children in the additional safe space instead of an existing program. Most women and children were housed in the additional spaces because the existing transition housing program was full, their health was vulnerable, or they required self-isolation or quarantine.

BC Housing used data from transition housing providers to determine if spaces were secured where needed

#### REASONS FOR USING ADDITIONAL SAFE SPACES (APRIL 2020 - MARCH 2021)



**SOURCE:** BC Housing

#### Why this matters

By tracking the number, location, and use of additional safe spaces, BC Housing could see whether the additional safe spaces were meeting the demand, helping to ensure spaces were available to women and children leaving violence.

#### BC Housing made adjustments, but better data needed

#### What we looked for

We assessed whether BC Housing adjusted the number and location of additional safe spaces and whether it added spaces where demand was high.

Learn more about the audit criteria.

#### What we found

BC Housing made the necessary adjustments to ensure spaces were available where and when needed. However, we found gaps in its response to data showing instances where women were turned away because of insufficient space.

BC Housing adjusted the number of rooms based on occupancy levels at safe spaces, and in consultation with the transition housing providers operating the additional spaces. Also, BC Housing allowed most operators of additional safe spaces to book extra rooms as needed, and covered the costs. Book-as-needed arrangements allowed for some flexibility in offering additional space, if required, without formally changing the lease agreements.

The majority of transition housing providers we interviewed confirmed they had access to the number of spaces they required. BC Housing managed to provide these spaces despite several challenges including hesitancy by some hotel owners to house vulnerable populations, limited hotels in some communities, and increased demand for hotel rooms from the tourism and resource sectors

While BC Housing collected data on instances where women were turned away from additional safe spaces due to insufficient space, we found that it had not used this information to add spaces in areas where demand was high. BC Housing indicated that there were limitations to this data because it does not account for women who were turned away and then found alternative transition housing. Also, the same woman could be counted multiple times if they are turned away by more than one transition housing provider.

#### Why this matters

It is important for BC Housing to respond to instances where women are turned away because of insufficient space. There is a risk that some women and children leaving violence were unable to find a safe space during the pandemic.

#### Recommendation

4 We recommend BC Housing work with transition housing providers to respond to the limitations of the data on women turned away due to insufficient space.

See the response from the auditee.



#### BC Housing reported publicly on its provision of safe spaces

#### What we looked for

We assessed whether BC Housing reported publicly on its provision of additional safe spaces for women and children leaving violent or unstable situations during the COVID-19 pandemic.

Learn more about the audit criteria.

#### What we found

BC Housing reported publicly on its provision of additional safe spaces for women and children leaving violent or unstable situations during the COVID-19 pandemic.

BC Housing released two public reports that summarized monthly data collected by the transition housing providers during the pandemic. The second of the two reports, released in Oct. 2021, covered the period between April 2020 and March 2021. The reports included statistics and information on:

- the number of sites and spaces,
- the number of stays,
- occupancy information by region,
- reasons for referral (e.g., COVID-19-related or other program full),
- some demographic information,
- where women went after departure (e.g., other shelters, second-stage housing) and what supports were provided (e.g., referrals to community services, number provided with safety plans).

#### Why this matters

Public reporting helps to demonstrate transparency and accountability. BC Housing's reports helped inform the public about how it continued to support women and children experiencing violence during the pandemic. These reports can also support BC Housing's future program decisions, including emergency planning.

## About the audit

We conducted this audit under the authority of section 11(8) of the *Auditor General Act* and in accordance with the Canadian Standard on Assurance Engagements (CSAE) 3001—Direct Engagements, set out by the Chartered Professional Accountants of Canada (CPA Canada) in the *CPA Canada Handbook—Assurance*. These standards require that we comply with ethical requirements and conduct the audit to independently express a conclusion against the objective of the audit.

A direct audit involves understanding the subject matter to identify areas of significance and risk, and to identify relevant controls. This understanding is used as the basis for designing and performing audit procedures to obtain evidence on which to base the audit conclusion.

The audit procedures we conducted included document analysis and enquiry. The documents we analyzed included program data and reports, program guidance, and agreements with service providers. We interviewed BC Housing staff, a sample of 12 transition housing providers that operated additional spaces, and some provincial-level organizations working in the area. We carried out all interviews remotely due to COVID-19 restrictions.

We believe the audit evidence we have obtained is sufficient and appropriate to provide a basis for our conclusion.

Our office applies the Canadian Standard on Quality Control (CSQC 1), and we have complied with the independence and other requirements of the code of ethics issued by the Chartered Professional Accountants of British Columbia that are relevant to this audit.

Audit report date: March 5, 2022

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Michael A. Pickup, FCPA, FCA

Auditor General of British Columbia

Victoria, B.C.

# Appendix A: Recommendations and auditee response

**RECOMMENDATION 1:** We recommend BC Housing confirm the staffing needs of all transition housing providers when offering resources to operate additional spaces.

#### **RECOMMENDATION 1 RESPONSE:** The auditee accepts this recommendation.

In some communities, the securing of the hotel rooms was required as spaces at the existing transition houses were reduced to support physical distancing. The use of the hotels rooms did not necessarily result in additional spaces. And for some programs the reduction of spaces at existing sites was minimal or capacity was increased over time resulting in additional spaces. The Women's Transition Housing & Supports Program as a whole has not utilized additional temporary spaces in this way in the past. BC Housing's process for developing new programs and/or expanding programs includes drafting and approving an operating budget that includes staffing needs and resources. BC Housing will ensure that this same process is applied to the operation of temporary additional spaces.

**RECOMMENDATION 2:** We recommend BC Housing implement a process to support hotel and motel compliance with lease agreements to help ensure rooms are held for BC Housing's exclusive use.

#### **RECOMMENDATION 2 RESPONSE:** The auditee accepts this recommendation.

BC Housing will communicate to hotel operators the importance of ensuring rooms are held for BC Housing as agreed to.

**RECOMMENDATION 3:** We recommend that BC Housing work with transition housing providers to implement a process to monitor whether additional spaces are accessible to all women as specified in the service agreement.

#### **RECOMMENDATION 3 RESPONSE:** The auditee accepts this recommendation.

BC Housing has scheduled consultation sessions with the sector to discuss the collection of additional demographic information as part of the data collection process for both the existing spaces and additional spaces. There are challenges and limitations with collecting additional information as it may present a barrier to women accessing the program and could jeopardize their safety. Based on the consultation, BC Housing will determine if it is possible to safely and appropriately collect these additional indicators.

**RECOMMENDATION 4:** We recommend BC Housing work with transition housing providers to respond to the limitations of the data on women turned away due to insufficient space.

#### **RECOMMENDATION 4 RESPONSE:** The auditee accepts this recommendation.

BC Housing has scheduled consultation sessions with the sector to review and discuss the current data collection process. This will include considering expanding the reasons why women are turned away from the programs. And we will pursue opportunities to address how women are supported if there is insufficient space within the programs.

# **Appendix B: Audit criteria**

#### 1. Provision of safe spaces

- **1.1** BC Housing used baseline inventory information to determine the initial space needs created by the COVID-19 pandemic.
- **1.2** BC Housing provided additional safe spaces in response to the service needs identified by transition housing providers during the COVID-19 pandemic.
- **1.3** BC Housing sought to provide additional safe spaces to all women irrespective of ethnocultural background, religious beliefs, physical ability, health, mental wellness, social context, sexual orientation, and/or gender identity.

#### 2. Monitoring, adjusting, and reporting of safe spaces

- **2.1** BC Housing tracked the number, location, and use of leased hotel/motel spaces over time to determine if spaces were secured where and when needed.
- **2.2** BC Housing made the necessary adjustments to ensure that spaces were available where and when needed.
- **2.3** BC Housing reported publicly on its provision of additional safe spaces for women and children leaving violent or unstable situations.



#### AUDIT TEAM

Malcolm Gaston Assistant Auditor General

> Amy Hart Executive Director

> > Suzanne Smith Manager

**Emily Braeuer** Auditor

Janice Dowson Auditor

#### LOCATION

623 Fort Street Victoria, British Columbia Canada V8W 1G1

#### **OFFICE HOURS**

Monday to Friday 8:30 am - 4:30 pm

Telephone: 250-419-6100

Toll-free through Enquiry BC: 1-800-663-7867

In Vancouver: 604-660-2421

FAX: 250-387-1230

**EMAIL:** bcauditor@bcauditor.com **WEBSITE:** www.bcauditor.com

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