VAUGHAN

INTERNAL AUDIT REPORT

Emergency Management and Business Continuity Program

May 2022

INTERNAL AUDIT REPORT

AUDIT OF EMERGENCY MANAGEMENT AND BUSINESS CONTINUITY PROGRAM

DETAILED REPORT

Overall, the City of Vaughan has a mature EM and BC Program. The City's approach to emergency management and business continuity aligns with its legislated requirements, as well as recognized industry standards and leading practices. The foundational components of the program, including a detailed emergency management structure and well understood processes and procedures for managing emergencies are in place.

The Fire and Rescue Services division, which is tasked with overall accountability and administration of the program, has achieved a high level of engagement amongst staff at all levels. In addition, and while it is in the process of being addressed, a key reason for the advanced state of program maturity is directly related to the work of a single individual - Manager, Emergency Planning.

While the City has a comprehensive and high functioning emergency management component, MNP has noted minor opportunities for improvement related to strengthening the business continuity component of the overall program. These improvements are noted in the Observations and Opportunities for Improvement section of this report.

Strengths

In conducting this audit, a number of strengths associated with the City's overall EM and BC Program were identified. A summary of these key strengths are as follows:

Experienced and Knowledgeable Program Administrator	The City's Emergency Management Program administrator is the Manager, Emergency Planning who is part of Vaughan Fire and Rescue Service and reports to the Fire Chief. The Manager, Emergency Planning is responsible for all aspects of program administration and the Fire Chief is accountable for the overall program. MNP observed a high level of engagement in the program from all interviewees, all of whom identified that a key driver and an overall strength of the EM and BC Program is the result of the work, knowledge, leadership and experience of the Manager, Emergency Planning. The individual's experience includes both formal credentials, including the Associate Business Continuity Professional designation and accreditation as a Community Emergency Management Coordinator, and almost two decades in the role leading response activities. Her focus is on ensuring the City's legislative compliance to the EMPCA, but also on driving the ongoing maturity of the EM and BC Program. This was observed through multiple interviews with internal City staff and emergency management liaisons from external partners, as well as documentation outlining the guidance and assistance that the Manager,

	Emergency Planning provides across the City, and particularly through her efforts to integrate proactive emergency preparedness considerations into established procedures outside of her direct area. This includes identifying specific considerations for vendor permits, development applications and safety plans for critical infrastructure, and providing ad hoc reviews to confirm these considerations are being appropriately addressed. The breadth of this role is broader than what MNP has observed across other municipalities of a similar size.
Emergency Response Team Training	The emergency management training component of the program is a clear strength for the City. The City has an Emergency Response Team (ERT), which leverages the provincial Incident Management System (IMS) that has been modified for the City's unique operating environment (note that modification of the IMS is a common and accepted practice for municipalities). All ERT positions have a primary and two designated alternates. There is good engagement in the annual simulated emergency training sessions, with staff participating from across the City, including at the senior leadership level and the Mayor.

Interviewees noted that the annual training simulations have been valuable opportunities for practice and confirm the City's activation, notification, and response procedures. The City follows leading practices when developing and facilitating the annual training, including the development of a cross-functional exercise design team, and involving external stakeholders from critical infrastructure providers, if required by the scenario. The City develops exercise objectives and scenarios based on the results of the Hazard Identification Risk Assessment (HIRA), which provides analysis on the hazards most likely to occur and/or those that would be the most impactful. Based on a review of previous exercise documentation, this methodology has helped the City select current and relevant scenarios for previous exercises and should help them do so going forward.

Additionally, certain IMS Sections hold their own training sessions to practice their specific processes in advance of the exercise. This is done with support from the Manager, Emergency Planning as required, and in alignment with the City's established emergency response processes.

In 2021, the annual exercise was conducted virtually, which was appropriate due to the COVID-19 pandemic. |
| **Ongoing Staff Consultations** | To ensure the Manager, Emergency Planning was focused on the pandemic response, the City assigned the Office of Transformation and |

and Monitoring during COVID-19	Strategy to support the Fire and Rescue Services office with ongoing staff consultations, data analytics and research. The team conducted interviews with Senior Leaders and other City staff, conducted a City-wide survey, tracked key operational metrics, tracked COVID-19 infection rates and, in coordination with the Manager, Emergency Planning, produced seven lessons learned reports from April 2020 to December 2021. These reports provided the City with an overview of the current state at different points during the pandemic and provided data that informed policy development, including the update to the City's wellness strategy and will inform ongoing work by the Business Re-Integration Task Force to determine the City's Return to Work plan.
Procurement and Health & Safety	The response to the COVID-19 pandemic required a concerted effort from multiple areas of the organization. Two areas stood out for having clear processes that contributed to the response: • Procurement – The City prioritized requesting PPE in the early days of the pandemic to ensure there was sufficient supplies for front-line staff. As the pandemic continued, the Procurement team was mobilized to work with the Region and other municipalities to supply personal protective equipment (PPE) to their respective stakeholders. This was important to ensure their communication to major PPE vendors was consistent and coordinated so there would not be any lag in the delivery. The City also implemented internal protocols for ordering and forecasting PPE needs which were communicated to the departments and administered by Procurement to provide them with oversight of the City's overall PPE supply. In addition, the City had sufficient stores of PPE in place prior to the pandemic and interviewees reported there were no significant gaps in supplying front-line staff with required PPE. • Health & Safety – The City's health and safety department undertook extensive coordination with Regional and provincial partners, developing and updating policies and procedures to ensure the City was adhering to all provincial requirements. They also developed a training program to execute on the City's decision regarding its vaccine policy for staff and vendors and provided a high level of support to staff, particularly at the managerial level, to assist with the implementation.

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Observations and Opportunities for Improvement

To enable management to set priorities in their action plans, we have reported our observations in one of three categories, "**Low**", "**Medium**" or "**High**" based on our assessment of the significance (i.e. impact and likelihood of occurrence) of each observation, as follows:

Rating	Description
Low	The observation is not critical but should be addressed in the longer term (18+ months) to either improve internal controls or efficiency of the process **OR** has been addressed and should be carried forward for future response.
Medium	The observation represents a control weakness, which could have or is having an adverse effect on the ability to achieve process objectives. The observation requires management action within the short-to-intermediate term (6-12 months).
High	The observation represents a control weakness, which could have or is having a major adverse effect on the ability to achieve process objectives. The observation requires immediate management action (within 6 months).

Observations and Opportunities for Improvement		
1	**Key Person Risk**	**High**

Observations:
The knowledge and experience of the Manager, Emergency Planning is a key strength of the City's program. However, by assigning the overall administration of the program to one role, there is a risk that the quality and ongoing sustainment of the program would be negatively impacted if the Manager, Emergency Planning was to transition out of this role.

Based on benchmarking, municipalities with comparable populations to the City typically have between 1 to 2 staff members that are dedicated full-time to overseeing EM and BC Programs and report into the Fire Chief or similar position (e.g., a General Manager of emergency and/or fire

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services). However, caution should be applied when comparing similar sized municipalities as each have a different level of comprehensiveness and operational effectiveness with respect to emergency management and business continuity programs, and the program leads often have a different scope responsibility.

The City recently approved an additional position to help oversee the program and is currently in the process of hiring an Emergency Planning Advisor. The level of this position (Advisor) is also aligned with what municipalities with comparable populations have in place: a manager-level resource to oversee the program with a coordinator or advisor-level position providing support. Considering the current breadth of the City's EM and BC Program, this should be an adequate staffing model moving forward if it can also be supplemented, as needed, by seasonal student contracts, access to shared administrative support and, as required, external consulting support. This will ensure the City has access to sufficient resources for any "surge" work or to execute specific projects.

MNP reviewed the job description for the Emergency Planning Advisor position and found that it has a comprehensive description of the certifications, qualifications and experience that would be required for this position. In particular, the Associate Business Continuity Professional (ABCP) designation will ensure the City is recruiting candidates that can provide coordination and support for activities related to both the EM and BC program components. The job description includes roles and responsibilities related to emergency management training, documentation management and public education related to emergency management. These are key areas where an advisor position would typically focus their efforts to support a program manager, and directly relates to areas where the City has compliance requirements under the Emergency Management and Civil Protection Act (EMCPA) - it is therefore helpful to distribute tasks in these areas, and this is the approach other municipalities with more than one dedicated staff member have taken.

Recommendation:

MNP appreciates the City is currently in the process of hiring an Emergency Management Advisor but feels it is necessary to stress the importance of filling this position. By allocating additional resources to the EM and BC program, the City is demonstrating its support for the program and its ongoing sustainability. Due to the depth and breadth of the City's program, which is broader than some of its peer programs, this audit supports the City's ongoing work to create and fill this new Emergency Planning Advisor position.

Although filling this position with a suitable candidate is a key step to remediate this key person risk, it will remain a high risk finding until sufficient on boarding, knowledge transfer and cross-training is in complete. MNP also recommends that the City re-assess their staff complement once the Emergency Management Advisor has been in place for a year to determine whether further allocation of resources to the City's emergency management and business continuity program are required.

	Observations and Opportunities for Improvement	

Management Response:

Management concurs with the findings. The Emergency Planning Advisor has been hired and knowledge transfer has been initiated.

Action Plan:
1. Onboarding, orientation, and cross training of the Emergency Planning Advisor will be implemented in Q2-2022. Additional training in City processes and professional development will be scheduled through the City's Learning and Development Program and external emergency management course providers for the Emergency Planning Advisor.
2. A review of department human resources needs will be conducted in Q2-2023 and if identified will be included as an additional resource request in the 2024 budget submission.

Responsibility: Manager of Emergency Planning

Completion Date:
1. Onboarding, orientation, and cross training will be completed by December 31, 2022.
2. Additional human resources analysis will be completed by May 31, 2023

2	**Leveraging Technology – Business Continuity software**	**Medium**

Observations:
From a business continuity perspective, the City is operating a structured yet complex program. All departments have Business Continuity Plans (BCPs) in place which also include Business Impact Analysis (BIA) requirements. Although the BC components of the program are well understood and staff appear to be engaged, it was observed that some gaps exist with document management. The Manager, Emergency Planning keeps controlled copies of each BCP and ensures they are distributed only to the appropriate departments, however, there are no guidelines or structured processes for maintaining the BCP at the department-level, which may result in difficulties tracking the most up to date version of the plans.

It is acknowledged that through its regular reporting on the COVID response, the City has identified an action item for Emergency Planning and OCIO to investigate digital solutions to improve the BCP process. Work during this audit fully supports this and concurs that the BC components of the City's overall program are mature enough that they would benefit from further digital solutions, specifically a software to assist with document management, plan details and to streamline annual and ad-hoc maintenance activities. Continuing with current efforts to manually manage and maintain the City's business continuity program will be an administrative burden, decrease efficiency and leave less time for value-added

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activities.

There are a number of reputable business continuity software solutions available which would provide the following benefits to the City:

- Ability to link software to the City's Active Directory in order to:
  - Assign access control to relevant departmental plans based on job title
  - Share other documents relevant to the City's overall resiliency program with relevant user groups
- Changes to job title in Active Directory can trigger notifications to the Program administrator, alerting them to a new Lead or Alternate that should be included in the next BCP orientation session. Subsequent notifications can be sent to the new Lead or Alternate to advise them of the ability to access the software and direct them to training materials, as required. Notifications can also be sent to Division Heads to request their review and/or sign-off of updated BCPs
- Ability to designate mandatory fields and require departments to add relevant information rather than following up with them numerous times
- Enable staff to make ad hoc updates to their BCP to keep them engaged in the program and ensure documents are current
- Ability to quickly isolate and pull datasets on various key criteria (e.g. list of critical applications based on Recovery Time Objectives identified by the business, or a list of time sensitive services that can form a basis for any discussions on essential services) which can provide key inputs into other planning efforts being undertaken
- Real-time data to support development of Key Performance Indicators for reporting
- Reduce administrative burden associated with the work done to manually track, follow up and store documents that is currently performed by the Manager, Emergency Planning

Additionally, the majority of these software solutions are web-based, which means that BCPs will be available regardless of any internal IT-related disruptions, and many can be accessed via mobile apps in addition to web browsers.

The City has a separate software in place for the EM program. As part of this audit, a walkthrough of the Incident Point software was conducted. The City implemented this software tool in 2017 for use in the Emergency Operations Centre (EOC). Interviewees confirmed they have received training on the software and utilized it during both the last exercise and the actual response to COVID-19. Key City emergency response partners have also received training on the software, and some have implemented it as part of their respective programs which they note supports inter-operability. The software is primarily a repository for document management and built in SharePoint. It does not function as a virtual EOC and was not designed for this purpose.

Recommendation:

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The City should conduct a review of available business continuity software with the view of streamlining its annual update, implementing stronger controls around document management, and automating the review of these plans by the Manager, Emergency Planning. Software can help with the automation of these processes and support the development of reporting dashboards with supporting KPIs related to business continuity as well as assisting to monitor overall plan detail.

When reviewing business continuity software, the City should consider the following common business continuity software requirements:

- Data integration (e.g. Active Directory)
- Ease of use and training requirements for users
- Workflow management, including the ability to trigger notifications
- Embedded notification or call tree feature
- Vendor support available after business hours and through pre-developed training material on software that can be provided to new users
- Accessible and continuously available through external environment
- Information security, including where data will be stored, and security features utilized by the vendor

The City may wish to include the Incident Point product in their overall software review as it is already being used as part of the EM program.

Management Response:

Management concurs with the recommendation that business continuity planning software will streamline the processes and aid in keeping information current. This task will be integrated into a larger project being proposed for a cross functional business continuity planning working group.

Action Plan:
- In consultation with Emergency Management Program Committee (EMPC) a working group consisting of representatives from interested end user departments should be created to evaluate the ease of use of software solutions
- Emergency Planning will submit a business request to OCIO for support on investigating and evaluating the software.
- In consultation with Office of the Chief Information Officer (OCIO) and the evaluation working group, the Emergency Planning program will investigate business continuity planning software that includes the features recommended.
- The working group will evaluate current software used by the City to determine if business continuity planning (BCP) is a function or add on option.
- An additional resource request/capital budget request will be submitted through the budget process for software.

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	Observations and Opportunities for Improvement	
Responsibility: Emergency Planning, OCIO and Business Continuity Planning Working Group.		
Completion Date: Q2-2023 for reviewing available software, procurement and implementation is subject to the budget process.		
3	**Adherence to Established Response Procedures**	**Medium**
	Observations: The City has spent considerable amount of time training EMT members to respond using the IMS, a best practice response model that has been adapted for the City's operating environment, and it has worked well in the past. The model includes sections which focus on specific activities and has clear reporting channels. During COVID-19, based on direction from a new senior staff member, the City shifted to a Task Force model to distribute activities amongst EMT members and other staff. A Task Force can be a useful model to solve a specific, unique problem during an emergency, but due diligence must be completed to confirm that the Task Force's objectives cannot be handled with the existing Sections in the IMS structure - and the Task Force must still communicate and receive information through the existing EOC channels. Many interviewees noted that the purpose of the task forces was not clear. Task Force team members were still expected to attend Section meetings and identified that this created a duplication of the work they were being asked to complete. While there may be valid reasons for changing the City's response structure, typically these changes are done after a response as part of the after-action review process. It is not typical or recommended to make changes to the response structure during an ongoing response. **Recommendation:** The City has identified this as a key lesson learned and during future responses will aim to follow their documented response procedures. Work during this audit, and a review of leading practices, supports this approach and reinforces that the City should not deviate from procedures that have been practiced, are established and are well-known by EMT members. This is also in accordance with the City's Terms of Reference for its Emergency Management Program Committee, which currently has the authority to make recommendations for program changes or enhancements to the Council. The City may wish to amend these Terms of References to stipulate that these recommendations should not be considered during an ongoing response.	

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Alternatively, the City may wish to consider stronger administrative measures to prevent future modifications to their structure during an ongoing response, such as codifying this through its by-law procedures. If a Task Force is required, the City should first document its purpose and objectives to confirm that it cannot be handled under the IMS structure. Any EMT members that serve as a primary under the IMS structure should be replaced in the EOC by an alternate if they have been asked to join the Task Force. In addition, the Task Force should provide updates into the EOC to ensure the EMT is kept up to date on their activities and to reduce duplication of tasks in the EOC. **Management Response:** Management agrees that changing or introducing new processes during an emergency response can create confusion. It is recognized that each emergency response is unique and requires the Emergency Management Team (EMT) to be flexible and adaptable. The emergency plan is written as a guidance document to allow for the EMT to be agile in adjusting response activities based on how the situation is manifesting. Action Plan: • A comprehensive review and revision of the emergency plan is in progress that addresses recommendations made by the EMT during the pandemic response and past exercises. • A framework is being included in the plan for conducting evidence-based situation assessments and Command level consensus when new procedures are identified as being the best means to address current and emerging issues. • The processes established in the situational assessment framework will align with existing procedures (i.e. situation assessment for declaration of an emergency). • Where new operating structures are deemed to be the best means of managing issues, Section Chiefs are responsible for ensuring that staffing resources are in place to prevent excess workloads for EMT members. Wherever possible work will be distributed amongst all EMT members assigned to a position. Responsibility: • Manager of Emergency Planning • Emergency Management Program Committee • Emergency Management Team members	

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	Completion Date: • Draft of the revised Emergency Plan will be circulated to EMPC Q3, 2022 for comment. • Final EMPC endorsed Emergency Plan will be submitted to Council Q1, 2023 for approval.	
4	**Business Continuity Plan – Governance Structure**	**Medium**

Observations:
Gaps were observed in the City's governance structure for business continuity. While the Manager, Emergency Planning is accountable for the oversight and the coordination of the program, there is less clarity at the division and department-level.
The audit selected a sample of Business Continuity Leads for interviews; two of the Leads were new to their roles within the City and had not been notified that business continuity was part of their new job description.
A broader issue is that the Manager, Emergency Planning does not have a list of all Business Continuity Leads and Alternates and there is no prompt for departments to assign a Lead or Alternate.
Finally, the Manager, Emergency Planning has put together a fulsome guideline to help departments complete their BCPs. The guideline has sufficient information outlining the purpose of business continuity and information that needs to be included in the plans. However, there is no information outlining how the BCP will be activated and how information will be managed during a business disruption, which is a leading practice and typically included within a plan.
These findings may create confusion related to providing business continuity-related training to appropriate staff and executing plans.

Recommendation:
Develop a standard structure which outlines the position within each department that will be assigned as a Business Continuity Lead and/or Alternate. For example, Leads may be assigned at the Director level and Alternates may be assigned at the Manager level. This will enable the City to update their job descriptions to include responsibilities related to business continuity, and trigger business continuity training to occur during onboarding.
Update the Business Continuity guideline to include information on plan activation and information management during a business disruption. The City may also consider adding a 'Business Continuity Liaison' position to the City's IMS to ensure greater integration of emergency management and business continuity during training and response. Alternatively, the responsibility for business continuity in the Operations Branch of the IMS. This is a common practice for organizations who use the IMS model as their primary response framework and have assigned program management and oversight of emergency management and business continuity plans to the same functional role (i.e., the Manager, Emergency Planning).

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Observations and Opportunities for Improvement		
Management Response: Management concurs that defined processes need to be integrated into standard operating procedures to ensure that managing of business continuity plans at the department level is consistent. Action Plan: The program will bring forward a report to the June 23, 2022, Emergency Management Program Committee to approve the following actions to enhance business continuity planning: • Establish a cross functional team to develop a governance framework and policies to integrate business continuity planning into daily business operations • EMPC will direct People Leaders to appoint key personnel from each portfolio to the working group and appoint BCP leads for each department • The working group will develop the governance and operating framework for BCP in the City. • The working group will design the BCP program to reduce duplication in data collection. • The working group will report on their progress to the EMPC. • The working group will review and make recommendations on BCP software options. Responsibility: Emergency Management Program Committee and BCP Working Group. Completion Date: Q4-2024.		
5	**Training – Business Continuity**	**Low**
Observations: There is no onboarding specific for BC Leads, and departments do not have consistent methods of updating their BCP. The Manager, Emergency Planning is available as required to assist with updates but does not have the capacity to facilitate all departmental reviews and updates. A business continuity software would help in this regard (See Observation #1). **Recommendation:** It was noted that through the regular reporting during the COVID-19 response, the City has identified an action item for training on the business continuity process. This audit supports this action item and recommends that the City develop a mechanism to alert the Manager, Emergency		

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Planning when new BC Leads or Alternates require this training. If the City assigns BC Leads and Alternates by position, this can be done through an automated notification through a business continuity software solution linked to Active Directory.
Training material can also be prepared in advance and added to onboarding training and provided to BC Leads and Alternates.
In order to avoid capacity issues for the Manager, Emergency Planning, training itself should be delivered on an annual basis, prior to the BCP updates. However, BC Leads and Alternates should be notified when they take on this position that they are responsible for annual updates and should be provided access to their departmental BCP.

Management Response:

Management concurs with the recommendation and will be bringing forward a report to the June 23, 2022, meeting of the Emergency Management Program Committee to establish a cross functional working group to develop a corporate wide framework for business continuity planning.

Action Plan:
- EMPC direct people leaders to appoint staff as department BCP leads.
- Staff appointed as leads and/or members of the working group will be provided the opportunity to receive formal training and certification in BCP.
- An internal training program will be developed and implemented based on the Disaster Recovery Institute Canada and International standards of practice for staff assigned the duties of BCP.

Responsibility: Manager of Emergency Planning and the Emergency Management Program Committee

Completion Date: Q4-2024

6	Business Continuity Plan – Focus Areas for Upcoming Review Period	Low

Observations:
All departments and areas have BCPs in place. The level of detail varies by department, but overall, these plans have sufficient detail. As part of the after-action reviews held during COVID-19 response, the OTS has put together a list called Service Status Inventory, which outlines changes to services that have been made due to COVID-19. The changes/modifications to services are listed in three phases that mirror the province's phases for re-opening. As per the inventory, modifications that are carried into Phase Three will be in place for the foreseeable future.
While most of the BCPs have been updated in 2021, not all of the plans reviewed by during this audit included or referenced the modifications

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referenced in the most recent plan version.

Additionally, the BIAs include information on the minimum staffing levels and job titles required to perform each service, but no information on what cross-training is in place or required.

A business continuity software would help automate these items (See Observation #1).

As the City adds further rigor to its approach to business continuity plan updates, a further benefit is that these plans will have additional details and can be further incorporated into the City's EM and BC training activities. For example, in order to reinforce the benefits of having fulsome manual workarounds in place, the City could leverage a ransomware or cyber attack scenario to demonstrate the importance of its BCPs.

Recommendation:

Ensure all departments incorporate the workarounds developed during COVID-19 that will be in place over the longer term into the City's next round of plan updates and identify whether there are any staff risks or gaps in staffing that may impact ongoing and continual service delivery and can be dealt with proactively. For this piece, the City may be able to leverage work completed as part of labour disruption planning in 2021.

Management Response:

Management concurs with the recommendation and will provide support to departments during the annual review.

Action Plan:
- Provide clear direction during BCP review process to expand upon work arounds session and ensure gaps/risks related to staffing are included.
- Provide training sessions for department BCP leads to include more detail on work arounds and SME's.
- Provide support to departments in reviewing and updating BCP's.
- Review BCP workbook templates and update if necessary to ensure key information is collected (longer term process or will be integrated into software solution).

Responsibility: Manager of Emergency Planning and departmental BCP leads.

Completion Date: BCP reviews are conducted annually Q4-2022.

7	**Pandemic Management Guidelines**	Low

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Observations:

Like many organizations, the breadth and duration of the City's response to COVID-19 was one of the longest and the most complex emergencies the City has ever responded to. The City has Memorandums of Understanding (MOU) in place, developed in 2017 prior to the pandemic, that provided structure around the emergency social service components of a response, specifically reception centres. Although certain details of the response, including the mobilization of mass vaccination clinics in partnership with the Regional Municipality of York, had not been formalized in advance of the pandemic, they were put in place prior to the vaccine rollout. It was observed through review of this MOU that the roles and responsibilities of the City and Region were clearly documented, although the City did assist with the non-clinical operations to a greater degree than outlined in the MOU due to its ability to redeploy staff from certain areas (e.g., Recreation) that were not operating to full capacity during the pandemic. Interviews with staff that worked in, or oversaw teams who worked in, the vaccine clinics reinforced that there was good understanding of the scope of the roles of City and regional staff. The MOU also outlined requirements related to privacy and dispute resolution.

Recommendation:

It is understood that through its regular reporting on the COVID response, the City has identified an action item for the development of a pandemic management appendix to the Emergency Response Plan, with a due date of Q4 2022. This audit concurs with this action item on the basis that a best practice after an emergency is to document new procedures, processes or guidelines that were successfully implemented during a response. The pandemic management appendix should consider including the following:

- Guidelines for early monitoring of infectious diseases that have the potential to impact citizens and staff
- Process for working with the Region, or other partners as required, to identify and assess the need for vaccine clinics
- Identification of the position title within the City that should be responsible for management of the vaccine clinics
- Identification potential risks to the City related to health and safety, reputation, operations and develop mitigation measures for these risks, which may include the following training to staff related to:
    - Their roles and responsibilities as non-clinical staff
    - Information that is considered private under the Municipal Freedom of Information and Protection of Privacy Act and the importance of maintaining confidentiality in this setting
    - Importance of COVID-19 screening
    - Process for dispute resolution in the event of an issue with a client or staff at the Region
- Process for conducting spot checks on key operational components (e.g. COVID-19 screening)
- Process for standing down vaccine clinics based on pre-determined factors (e.g., percentage of population vaccinated, available supply, impact of staff redeployment on other City services)

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The pandemic management appendix will serve as the documented set of considerations and leading practices, and also provide information on pandemic-related processes and procedures that can be incorporated into future exercises to enhance the City's overall preparedness and resiliency. **Management Response:** Management concurs with the recommendations and work has been initiated to create a pandemic appendix to the Emergency Plan. Action Plan: • Work has been initiated on developing a pandemic management plan as an appendix to the Emergency Plan. • The pandemic management plan incorporates recommendations from the audit, lessons learned from the response and actions taken during the response. • The first draft of the pandemic management plan will be submitted to the EMPC for review and comment Q3 or Q4, 2022. Responsibility: • Emergency Planning Program and Emergency Management Program Committee. Completion Date: • Review and comment on draft plan Q3/Q4, 2022. • Approval of final version of pandemic management plan is targeted for Q1 2023.		
8	**Leveraging BCP Information to Define Essential Services**	**Low**

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Observations and Opportunities for Improvement
Observations: The Business Continuity Guideline and BCP documents define a mission critical service, as well as several criteria used to designate a service as 'mission critical.' Despite the work by departments to define and categorize their services during the early days of the COVID-19 pandemic, this effort did not leverage these existing definitions, or the BIA information, as a start point for designating critical services. This is a good example of a scenario where being able to quickly isolate and pull datasets on criteria such as essential services would be streamlined by a software solution. **Recommendation:** MNP appreciates that the City understands the benefit of leveraging available information from the BCP in order to streamline any assessment of essential services and has indicated they will follow this process in future responses. Work during this audit fully supports this approach going forward. **Management Response:** Management concurs with the recommendation. Leveraging the data in the BCP, requires ongoing training on BCP process. The BCP process needs to be integrated as regular operations and not just a tool when a crisis occurs. Action Plan: • This recommendation will be addressed by the proposed Business Continuity Planning working group and annual BCP reviews. Responsibility: • All departments Completion Date: • Review and revision of departmental BCP's is an activity conducted annually.

9	After Action Reporting	Low

AUDIT OF EMERGENCY MANAGEMENT AND BUSINESS CONTINUITY PROGRAM

Observations and Opportunities for Improvement
Observations: Throughout the course of the COVID-19 response, led by the OTS, the City identified various recommendations for improving processes and procedures across the organization. MNP observed that all recommendations related to the EM & BC Program have been transitioned to the Manager, Emergency Planning, who has incorporated these into a multi-year workplan. Interviewees from other areas did not have as detailed of a process to track their respective recommendations, although MNP appreciates that the OTS has a consolidated list of non-emergency after-action recommendations and has reported back to Council on the current status of these recommendations. **Recommendations:** MNP recommends that OTS continue to track these recommendations and provide additional, periodic updates to Council to ensure there is ongoing reporting on the status of these recommendations. **Management Response:** The Emergency Planning program agrees that tracking the status of lessons learned is critical to enhancing our emergency management capabilities. A lesson learned must be implemented to have a positive impact. Action Plan: • A workplan for the Emergency Planning program has been created that includes tasks to be completed and target dates for the lessons learned from past exercises and the pandemic response. • The Program reports regularly to the EMPC activities related to legislative compliance and on the status of implementation of lessons learned. • The recommendation regarding non-emergency related items has been forwarded to the Office of Transformation and Strategy for follow-up where appropriate. Responsibility: • Emergency Planning and OTS. Completion Date: • Emergency Planning must report to the EMPC and to Emergency Management Ontario on its activities due to the annual compliance requirements. • Annual compliance reporting must be submitted by December 31.