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## Fwd: BC Housing TOR

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From: Salter, Shannon PREM:EX <Shannon.Salter@gov.bc.ca>  
To: Smith, Matt PREM:EX <Matt.Smith@gov.bc.ca>  
Sent: November 23, 2022 9:32:19 AM PST  
Attachments: BC Housing TOR FINAL.pdf, image001.jpg  
Here are the TOR for the ongoing forensic audit.

---

**From:** Fischer, Carl M FIN:EX <Carl.Fischer@gov.bc.ca>  
**Sent:** Wednesday, November 23, 2022 9:28:30 AM  
**To:** Salter, Shannon PREM:EX <Shannon.Salter@gov.bc.ca>  
**Subject:** FW: BC Housing TOR

The TOR for the forensic engagement might provide useful context in response to questions on this issue.

---

**From:** Kortum, Alex FIN:EX <Alex.Kortum@gov.bc.ca>  
**Sent:** November 23, 2022 9:25 AM  
**To:** Fischer, Carl M FIN:EX <Carl.Fischer@gov.bc.ca>  
**Subject:** BC Housing TOR

**Alex Kortum**  
Executive Director  
T 778.698.8133

**OCG** | OFFICE of the  
COMPTROLLER  
GENERAL

*Government confidentiality and privilege requirements apply to this message and any attachments. If you are not the intended recipient, you are hereby notified that any review, retransmission, conversion to hard copy, copying, circulation or other use is strictly prohibited. If you are not the intended recipient, please notify the sender immediately, and delete this message and any attachments from both your inbox and deleted items folder.*

## Introduction

Ernst & Young LLP, under the direction of The Comptroller General, completed a Compliance and Integrity Assessment (the "Assessment"), report date June 20, 2022, to ensure specific internal controls of British Columbia Housing Management Commission (BC Housing) are in place and operating as described. The Assessment identified issues at BC Housing related to its:

- Record retention and decision-making documentation practices
- Conflict of interest protocols
- Procedures for funding service-providers

The Comptroller General and the Ministry of Attorney General have determined that further action is warranted. The Comptroller General will undertake a forensic engagement of the issues identified in the Assessment.

The Comptroller General is responsible for the procurement and management of a service provider (the "Provider") to undertake the forensic engagement.

The Comptroller General's authority and duties are defined in the *Financial Administration Act* (the "FAA"). The Comptroller General is retaining the Provider to assist the Comptroller General in executing the powers and duties set out in the FAA.

## Purpose

The purpose of the forensic engagement is to provide the Comptroller General with sufficient evidence to confirm or dispel the issues set out in the Assessment, and if applicable, quantify any financial loss the Province of British Columbia may have incurred, and identify whether public money has been applied for the purpose for which it was provided to BC Housing.

## Scope

The scope of the assignment to the Provider will include an examination and written report to:

1. Confirm or dispel the issues reported to the Comptroller General in the Assessment, including to:
  - a. Quantify and evaluate the relationship between BC Housing and Atira Women's Resource Society (the "Society").
  - b. Evaluate BC Housing's record keeping and decision-making for financial transactions entered into with the Society.
  - c. Assess the financial decision-making methods and practices of the Chief Executive Officer and Chief Financial Officer of BC Housing.

- d. Evaluate if the Society used grants or advances of public money, or the borrowings of which may be guaranteed by the Government of British Columbia, for their required purposes.
2. Undertake a risk-based analysis of cash outflows to selected housing providers and perform limited data analytic procedures on other payments made by BC Housing considering potential fraud risks faced by the organization.
3. As identified through this forensic engagement, provide recommendations for improvement of BC Housing's processes or procedures.

The examination must include transactions that occurred during the last seven completed fiscal years, and the current fiscal year to date. The period under examination may be extended if the Comptroller General authorizes adjustments to the forensic engagement scope.

### **Approach**

Subject to the direction and approval of the Comptroller General, the Provider may determine their own processes and procedures provided that:

1. the forensic engagement process is impartial and fully considers the matters described above.
2. the Provider takes all reasonable steps to ensure that the forensic engagement process remains confidential and each participant in the process is advised by the Provider of this requirement during the process.
3. the Provider conducts interviews with any person who, in their professional opinion, could contribute information related to the issues.
4. persons being interviewed are provided with the option of being accompanied by another person.
5. evidence accumulated that confirms or dispels the concerns meets the balance of probabilities and burden of proof.
6. the Provider adheres to Standard Practices for Investigative and Forensic Accounting (IFA) Engagements as published by the Chartered Professional Accountants of Canada.
7. the Provider must at all times comply with all applicable laws, act only on the instruction and direction of the Comptroller General and ensure that the principles of administrative fairness are upheld throughout the forensic engagement process.

On the direction of the Comptroller General, the Provider is entitled to request records of ministries and Crown agencies, and specified service-providers, that are relevant to the Provider's process. With the approval of the Comptroller General, the Provider is entitled to access facilities and employees during regular business hours. The Provider may request persons attend in-person interviews in Vancouver, British Columbia.

At the time of entering into this agreement, the Comptroller General is not aware of any actions by any persons related to the forensic engagement that would be considered criminal in nature. If at any time during the forensic engagement the Provider discovers information that may suggest any criminal activity has occurred, the Provider must immediately stop the forensic engagement and provide that information to the Comptroller General. The Comptroller General will assess that information and determine if the matter should be referred to the appropriate law enforcement officials.

### **Timeframe & Reporting**

The forensic engagement must only commence following execution of the Service Agreement between the Province of British Columbia, as represented by the Comptroller General, and the Provider.

The Provider must provide sufficient information on a regular basis for the Comptroller General to assess that the forensic engagement purpose, scope, and timing remain relevant. Progress update meetings are to be held at minimum every two weeks, or sooner if determined by the Comptroller General or Provider.

The Provider's written report must be issued to the Comptroller General.

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## For V5: HOUS 112767

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From: Schollen, Tasha GCPE:EX <Tasha.Schollen@gov.bc.ca>  
To: GCPE Editors <GCPEEDIT@Victoria1.gov.bc.ca>  
Cc: Suddaby, Clay GCPE:EX <Clay.Suddaby@gov.bc.ca>  
Sent: March 24, 2023 8:13:30 AM PDT  
Attachments: IB\_EY Audit\_24 March 23\_FINAL.docx

Hello,  
IB for V5'ing, to go provincewide at 10am today please.

Thanks,  
Tasha

---

Tasha Schollen | Communications Manager  
Government Communications and Public Engagement  
Ministry of Housing  
Cell: 250-889-1121

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## INFORMATION BULLETIN

For Immediate Release  
[release number]  
March 24, 2023

Ministry of Housing

### **Ministry receives report on BC Housing, prepares for public release**

VICTORIA – Having received the report of the forensic investigation of BC Housing from the Office of the Comptroller General, the Minister of Housing has instructed the ministry to review the report and to take the appropriate steps to release as much information to the public as the law permits.

Following a 2022 external review conducted by Ernst and Young under the direction of the Crown Agency Secretariat, and at the request of the Minister Responsible for Housing, the Office of the Comptroller General initiated a forensic investigation to further evaluate details of BC Housing's operations with select service providers.

The process for the release of this information is stipulated by the Freedom of Information and Protection of Privacy Act. The Act includes a requirement that a public body must give sufficient notice to third parties before the release of information. The Province intends to release as much information as the law permits. The BC Public Service is carefully reviewing the report and ensuring due diligence under the appropriate Legislative authority for release.

Media will be notified in advance of the public release.

#### **Contacts:**

Ministry of Housing  
Media Relations  
236 478-0251

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## RE: draft MA

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From: Smith, George PREM:EX  
To: Madoc-Jones, Sian HOUS:EX <Sian.MadocJones@gov.bc.ca>, Smith, Jimmy PREM:EX <Jimmy.Smith@gov.bc.ca>  
Sent: May 4, 2023 2:58:35 PM PDT

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**From:** Madoc-Jones, Sian HOUS:EX <Sian.MadocJones@gov.bc.ca>  
**Sent:** Thursday, May 4, 2023 2:57 PM  
**To:** Smith, George PREM:EX <George.Smith@gov.bc.ca>; Smith, Jimmy PREM:EX <Jimmy.Smith@gov.bc.ca>  
**Subject:** FW: draft MA

Thoughts?

---

**From:** Suddaby, Clay GCPE:EX <Clay.Suddaby@gov.bc.ca>  
**Sent:** Thursday, May 4, 2023 2:54 PM  
**To:** Madoc-Jones, Sian HOUS:EX <Sian.MadocJones@gov.bc.ca>  
**Subject:** draft MA

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Let me know what you and PO think.

**Clay Suddaby** (he/him)  
Communications Director  
Ministry of Housing  
Government Communications & Public Engagement  
Mobile: 250-380-8947

*I gratefully acknowledge that I live and work on the traditional unceded territory of the Lekwungen Peoples, specifically the Songhees and Esquimalt First Nations. Hay'sxw'qu Si'em*

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## Latest News Release - Housing Update

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From: Smith, Jimmy PREM:EX <Jimmy.Smith@gov.bc.ca>  
To: Salter, Shannon PREM:EX <Shannon.Salter@gov.bc.ca>, Marriott, Sarah GCPE:EX <Sarah.Marriott@gov.bc.ca>, Smith, George PREM:EX <George.Smith@gov.bc.ca>  
Cc: Smith, Matt PREM:EX <Matt.Smith@gov.bc.ca>  
Sent: May 7, 2023 11:20:30 AM PDT  
Attachments: NR\_BG\_BC Housing EY Report - 7MAY23\_11.18pm .docx  
This is the latest version of the news release

**Jimmy Smith** (he/him)  
Deputy Communications Director  
Office of the Premier  
250-882-2892

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From: Schollen, Tasha GCPE:EX <Tasha.Schollen@gov.bc.ca>  
To: GCPE Editors <GCPEEDIT@Victoria1.gov.bc.ca>  
Cc: Suddaby, Clay GCPE:EX <Clay.Suddaby@gov.bc.ca>, Butler, Liam GCPE:EX <Liam.Butler@gov.bc.ca>, Schollen, Tasha GCPE:EX <Tasha.Schollen@gov.bc.ca>  
Sent: May 8, 2023 8:41:31 AM PDT  
Attachments: Office of the Comptroller General - Investigation of BC Housing - March 6, 2023.pdf, Table of Redacted Records - OCG BC Housing Report.pdf

Good morning,

I've attached 2 documents that we will need a home (a link) for, so we can link to them from our NR, which is going out on trigger release at approx. 10:05 am this morning.

The NR itself is still in approval, and we hope to have it soon for you.

Thanks,  
Tasha

---

Tasha Schollen | Communications Manager  
Government Communications and Public Engagement  
Ministry of Housing  
Cell: 250-889-1121

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## RE: New link for report - 2 Links for HOUS 113279

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From: Schollen, Tasha GCPE:EX <Tasha.Schollen@gov.bc.ca>  
To: Stagg, Linda R GCPE:EX <Linda.Stagg@gov.bc.ca>, GCPE Editors <GCPEEDIT@Victoria1.gov.bc.ca>  
Cc: Suddaby, Clay GCPE:EX <Clay.Suddaby@gov.bc.ca>, Butler, Liam GCPE:EX <Liam.Butler@gov.bc.ca>, Schollen, Tasha GCPE:EX <Tasha.Schollen@gov.bc.ca>  
Sent: May 8, 2023 9:44:22 AM PDT  
Attachments: NR\_BG\_BC Housing EY Report\_8 MAY 23\_FINAL.docx

Hi Linda,

Here is the NR for provincewide distribution on a hair trigger release at approx. 10:05am.

Thanks,  
Tasha

---

**From:** Stagg, Linda R GCPE:EX <Linda.Stagg@gov.bc.ca>  
**Sent:** Monday, May 8, 2023 9:07 AM  
**To:** Schollen, Tasha GCPE:EX <Tasha.Schollen@gov.bc.ca>  
**Cc:** Suddaby, Clay GCPE:EX <Clay.Suddaby@gov.bc.ca>; Butler, Liam GCPE:EX <Liam.Butler@gov.bc.ca>; Belanger, Matthew GCPE:EX <Matthew.Belanger@gov.bc.ca>; Cowan, Cale GCPE:EX <Cale.Cowan@gov.bc.ca>; Kerr, Grant GCPE:EX <Grant.Kerr@gov.bc.ca>; Plan, Jake GCPE:EX <Jake.Plan@gov.bc.ca>  
**Subject:** RE: New link for report - 2 Links for HOUS 113279

Now presenting two links that work -

[https://news.gov.bc.ca/files/ComptrollerGeneral\\_Investigation\\_BCHousing\\_6March2023.pdf](https://news.gov.bc.ca/files/ComptrollerGeneral_Investigation_BCHousing_6March2023.pdf)

[https://news.gov.bc.ca/files/Table\\_RedactedRecords\\_OCG\\_BCHousingReport.pdf](https://news.gov.bc.ca/files/Table_RedactedRecords_OCG_BCHousingReport.pdf)

Linda Stagg  
Senior Editor, Editorial Services | Corporate Priorities  
Government Communications and Public Engagement  
Mobile: 250 882-8673

---

**From:** Stagg, Linda R GCPE:EX  
**Sent:** Monday, May 8, 2023 9:04 AM  
**To:** Schollen, Tasha GCPE:EX <Tasha.Schollen@gov.bc.ca>  
**Cc:** Suddaby, Clay GCPE:EX <Clay.Suddaby@gov.bc.ca>; Butler, Liam GCPE:EX <Liam.Butler@gov.bc.ca>; Belanger, Matthew GCPE:EX <Matthew.Belanger@gov.bc.ca>; Cowan, Cale GCPE:EX <Cale.Cowan@gov.bc.ca>; Kerr, Grant GCPE:EX <Grant.Kerr@gov.bc.ca>; Plan, Jake GCPE:EX <Jake.Plan@gov.bc.ca>  
**Subject:** RE: New link coming - 2 Links for HOUS 113279

A space in the Investigation link is giving us a % - which won't work.

New 1<sup>st</sup> link coming

Linda Stagg  
Senior Editor, Editorial Services | Corporate Priorities  
Government Communications and Public Engagement  
Mobile: 250 882-8673

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**From:** Stagg, Linda R GCPE:EX  
**Sent:** Monday, May 8, 2023 8:55 AM  
**To:** Schollen, Tasha GCPE:EX <Tasha.Schollen@gov.bc.ca>  
**Cc:** Suddaby, Clay GCPE:EX <Clay.Suddaby@gov.bc.ca>; Butler, Liam GCPE:EX <Liam.Butler@gov.bc.ca>; Belanger, Matthew GCPE:EX <Matthew.Belanger@gov.bc.ca>; Cowan, Cale GCPE:EX <Cale.Cowan@gov.bc.ca>; Kerr, Grant GCPE:EX <Grant.Kerr@gov.bc.ca>; Plan, Jake GCPE:EX <Jake.Plan@gov.bc.ca>

**Subject:** RE: 2 Links for HOUS 113279

[https://news.gov.bc.ca/files/ComptrollerGeneral\\_Investigation\\_BC%20Housing\\_6March2023.pdf](https://news.gov.bc.ca/files/ComptrollerGeneral_Investigation_BC%20Housing_6March2023.pdf)

[https://news.gov.bc.ca/files/Table\\_RedactedRecords\\_OCG\\_BCHousingReport.pdf](https://news.gov.bc.ca/files/Table_RedactedRecords_OCG_BCHousingReport.pdf)

Linda Stagg  
Senior Editor, Editorial Services | Corporate Priorities  
Government Communications and Public Engagement  
Mobile: 250 882-8673

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**From:** Schollen, Tasha GCPE:EX <Tasha.Schollen@gov.bc.ca>  
**Sent:** Monday, May 8, 2023 8:42 AM  
**To:** GCPE Editors <GCPEEDIT@Victoria1.gov.bc.ca>  
**Cc:** Suddaby, Clay GCPE:EX <Clay.Suddaby@gov.bc.ca>; Butler, Liam GCPE:EX <Liam.Butler@gov.bc.ca>; Schollen, Tasha GCPE:EX <Tasha.Schollen@gov.bc.ca>  
**Subject:** HOUS 113279

Good morning,  
I've attached 2 documents that we will need a home (a link) for, so we can link to them from our NR, which is going out on trigger release at approx. 10:05 am this morning.

The NR itself is still in approval, and we hope to have it soon for you.

Thanks,  
Tasha

---

Tasha Schollen | Communications Manager  
Government Communications and Public Engagement  
Ministry of Housing  
Cell: 250-889-1121

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## NEWS RELEASE

For Immediate Release  
[release number]  
May 8, 2023

Office of the Premier  
Ministry of Housing

### **Province, BC Housing taking action on recommendations from forensic investigation**

VICTORIA – A new forensic investigation of BC Housing tabled in the Legislature has found mismanagement related to a conflict of interest between the former CEO of BC Housing and his spouse, the CEO of Atira Women's Resource Society.

The independent investigation identified 20 recommendations to improve financial oversight, prevent conflicts of interest, and ensure accountability for public funding being used to provide housing. Several of these reforms have already been implemented resulting from an earlier review which included similar recommendations.

“We expect the rules to be followed. There must be strong safeguards in place to preserve the public’s trust,” said Premier David Eby. “In 2021, I ordered a review into concerns at BC Housing - which ultimately led to today’s findings. We are working with the new leadership at BC Housing to implement all twenty of the report’s recommendations to ensure that BC Housing operates effectively as we deliver housing for people.”

In March 2021, David Eby, then-Minister Responsible for Housing, ordered an external review be conducted of financial and operational systems at BC Housing. Following that review, work began on strengthening oversight processes and the Board of BC Housing was replaced to ensure the organization had the appropriate financial expertise.

During the course of the initial review, further concerns came to light that were outside of the scope of that review. In July 2022, at the request of then-Minister Eby, the Office of the Comptroller General initiated a full forensic investigation to further evaluate details of BC Housing’s operations. In September 2022, the CEO of BC Housing resigned.

“We’re building a record amount of housing, but we need to do even more. That means our organizations must be equipped to properly manage these public funds,” said Ravi Kahlon, Minister of Housing. “We have a new leadership team in place at BC Housing who are leading the work to implement these recommendations and those from last year’s review. We’re united in our efforts to strengthen BC Housing’s processes and capacity as we continue to deliver the homes people need.”

While the financial investigation found no evidence of public funds being dispersed outside of their intended purpose or to provide material benefit to any one individual, Ernst and Young identified concerns with BC Housing’s financial oversight processes, including its conflict-of-interest protocols and the requirements under which funds were provided to Atira. Ernst and

Young made 20 recommendations to modernize BC Housing's financial accounting capabilities and improve its project and fiscal tracking systems.

BC Housing has already taken steps to enhance its financial accounting capabilities, policies and processes, stemming from last year's external review, that address many of the report's recommendations. BC Housing accepts all 20 of the report's recommendations –work is complete or underway on all recommendations and will be fully implemented by spring 2024.

This work includes:

- Creation of an anonymous employee whistle blower hotline (complete)
- Changes at the Executive Committee level to ensure enhanced controls in the way that projects are approved (complete)
- Enhanced governance and oversight through new processes and structures created with the new Ministry of Housing (complete/underway)
- A government representative on the Board (complete)
- Strengthened standards of conduct/conflict of interest policies including annual mandatory training with policies overseen and reviewed annually by the Board (complete/in progress)
- Changes regarding how budget and financial reviews of housing providers are completed, including expected timelines and mechanisms for compliance (in progress)
- Enhanced tracking and reporting to the Board of the budget and financial review process (in progress)

"The Board recognizes the serious nature of the issues identified in this report, along with the report released last summer. That is why BC Housing has taken significant steps since fall 2022 to strengthen its organizational structure and capacity, financial systems, governance practices, and policies related to oversight, transparency, and conflict-of-interest processes. In addition, BC Housing is already making progress on an action plan to respond to the recommendations in the forensic investigation," said Allan Seckel, chair, Board of Commissioners. "Our Board has complete confidence in BC Housing's current Executive Committee to lead the organization through its evolution into the more complex organization we are becoming."

BC Housing and Government will be exercising its full rights under the Operator and Operating Agreements with Atira to carry out the following:

- Reviewing Atira Women's Resources Society (AWRS) and Atira Development Society (ADS) and its financial transactions with related entities, pursuant to applicable BC Housing operating and operator agreements;
- Restricting any new funding to AWRS and ADS until the operational review is completed and concerns are addressed. Atira will not be considered for new funding calls or to manage new buildings until this is complete;
- Suspending the renewal of all AWRS operating and operator agreements until the review is complete; and
- Physically inspecting all Atira operated buildings, beginning May 9, 2023.

A backgrounder follows.

**Learn More:**

To read the forensic review of BC Housing, visit:

[https://news.gov.bc.ca/files/ComptrollerGeneral\\_Investigation\\_BCHousing\\_6March2023.pdf](https://news.gov.bc.ca/files/ComptrollerGeneral_Investigation_BCHousing_6March2023.pdf)

To read the list of forensic review redactions, visit:

[https://news.gov.bc.ca/files/Table\\_RedactedRecords\\_OCG\\_BCHousingReport.pdf](https://news.gov.bc.ca/files/Table_RedactedRecords_OCG_BCHousingReport.pdf)

**Contact:**

Jimmy Smith  
Deputy Communications Director  
Office of the Premier  
[Jimmy.Smith@gov.bc.ca](mailto:Jimmy.Smith@gov.bc.ca)

Ministry of Housing  
Media Relations  
236 478-0251

## BACKGROUNDER

For Immediate Release  
[release number]  
May 8, 2023

Office of the Premier  
Ministry of Housing

### BC Housing steps to implement recommendations

Under the guidance of the new Board of Commissioners, BC Housing has developed a comprehensive response plan to the 2022 external review and the 2023 forensic investigation that addresses the major findings and recommendations. BC Housing will address all 20 recommendations from the forensic investigation report by spring 2024. Outlined below is progress to date:

#### Recommendations and Corresponding Actions

1. Recommendation: consider strengthening the current conflict of interest (COI) policies to explicitly prohibit a COI of this magnitude from recurring in the future.
  - Action (complete): incorporated into BC Housing's updated Standards of Conduct Policy
2. Recommendation: consider updating the Standards of Conduct to clarify that employees, including members of Executive Committee (ExCom), are prohibited from enabling others in the organization to act on their declared COI's. This would include an obligation for BC Housing employees, including ExCom members, to report COI violations directly to the Board of Commissioners.
  - Action (complete): incorporated into BC Housing's updated Standards of Conduct Policy
  - Action (underway): implementation plan to include strengthened annual training, communication from Board Chair to all employees, and oath swearing by senior leadership
3. Recommendation: consider implementing an anonymous whistleblower hotline to provide employees the opportunity to report on matters of noncompliance with the Standards of Conduct, including the COI policies, and declarations made thereunder. The Standards of Conduct should then be updated to refer to the whistleblower hotline.
  - Action (complete): whistleblower hotline has been established and training has been implemented
  - Action (complete): incorporated into BC Housing's updated Standards of Conduct Policy
  - Action (underway): Board Chair communication on standards of conduct to reinforce whistleblower protections is underway; CEO communication is complete

4. Recommendation: consider implementing annual, organization-wide COI training, including continued annual signoff of the Standards of Conduct. Consider implementing annual signoffs of the COI declarations, as applicable.
  - Action (complete): incorporated into BC Housing's updated Standards of Conduct Policy.
  - Action (underway): mandatory standards sign off for all BC Housing employees by May 2023
  - Action (underway): sign off through oath taking by senior leadership by May 2023
5. Recommendation: consider implementing a process to ensure that the Standards of Conduct are reviewed by the Board of Commissioners at least annually and updated, where necessary.
  - Action (complete): incorporated into BC Housing's updated Standards of Conduct Policy
  - Action (complete): updated Board of Commissioners Terms of Reference approved
6. Recommendation: consider requiring Providers to submit ongoing financial information. At a minimum, this should include quarterly revenue and expense data.
  - Action (under consideration): BC Housing will work with Ministry of Housing and the not-for-profit sector to strengthen reporting, while considering non-profit capacity
7. Recommendation: consider establishing a formal structure and documented procedures outlining how budget and financial reviews are to be completed, including expected timelines and mechanisms for enforcement of those timelines.
  - Action (underway): initiate process for revising financial oversight and budget process, which will incorporate feedback from engagement with the not-for-profit sector
  - Action (underway): implement changes to financial review and budgeting processes identified as part of BC Housing's Business Transformation Program
  - Action (planned): identify IT solutions for processes that are currently manual
8. Recommendation: consider requiring that financial reviews are completed prior to analyzing and approving budget requests for subsequent fiscal years.
  - Action (underway): update process and procedures to address this issue and reflect the need for funding certainty while financial reviews are completed
  - Action (planned): amend operating agreements to reflect process change
9. Recommendation: consider developing a status tracking framework, including key performance indicators and oversight responsibility matrix, illustrating BC Housing's progress in performing budget and financial reviews. This status tracking framework can be presented to the Board of Commissioners on at least a semi-annual basis to promote enhanced governance practices.
  - Action (complete): BC Housing tracking status of financial reviews
  - Action (underway): enhanced reporting of the status of financial reviews to the Board of Commissioners

10. Recommendation: consider restructuring financial reviews to be under Audit Advisory Services' (AAS) purview, given AAS's mandate to "provide effective non-profit financial oversight... of BC Housing's largest and complex housing providers" and their financial qualifications, supplemented with support and consultation from the Operations team.
  - Action (underway): BC Housing will develop a new interim model of undertaking financial reviews
  - Action (underway): introduction of new manager role with accounting and finance experience
  - Action (underway): analyze organizational and staff roles within the financial review process
11. Recommendation: prioritize hiring additional individuals with an accounting and/or finance background to supplement both the AAS and Operations teams with the budget review and financial review processes.
  - Action (underway): retain firm to support advancing finance-related projects as part of Business Transformation Program
  - Action (planned): BC Housing to incorporate review of job descriptions and roles into organizational analysis underway
  - Action: (planned): deliver enhanced training for staff
12. Recommendation: consider if steps can be taken to simplify the funding models utilized by BC Housing to promote more efficient processes.
  - Action (planned): BC Housing to work with the Ministry of Housing to review funding program requirements
13. Recommendation: consider implementing additional preventative controls within BC Housing's information systems to require explicit confirmation of Excom approval for disbursements in excess of the relevant threshold.
  - Action (underway): BC Housing to incorporate consideration into review of Executive Committee terms of reference
14. Recommendation: consider implementing a triaging protocol whereby, in the event that BC Housing becomes aware of an actual or suspected breach of an operating agreement provision, a formal assessment and response plan is developed by ExCom with the assistance of legal counsel that requires reporting to the Board of Commissioners. We understand that BC Housing is introducing an Office of General Counsel and Corporate Secretary, which may aid in the implementation of this recommendation.
  - Action (underway): interim triaging protocol to escalate any compliance issue to the attention of the Vice President of Operations, who will engage outside legal counsel to provide formal assessment and remedies
  - Action (underway): development of framework for the formal assessment process – Planned

- Action (planned): procedures updated to replace external legal counsel with General Counsel once office established
15. Recommendation: consider implementing a process whereby quantitatively or qualitatively significant Executive Committee submissions are circulated to the full Executive Committee in advance of finalization, to help ensure the completeness of ExCom submissions and associated documentation prior to decision-making.
- Action (underway): incorporate into Executive Committee terms of reference
  - Action (underway): improved processes for Executive Committee to review reports
  - Action (planned): implement subcommittee structure for ExCom to ensure focused time to consider submissions
16. Recommendation: consider limiting business decision-making to formal communication methods such as email and virtual/in-person discussions supported by detailed meeting minutes. In the event that business decisions are made via text message, BC Housing should communicate the requirement for these records to be retained in the official record management system.
- Action (underway): incorporate into Executive Committee terms of reference
  - Action (underway): document practice that texts and instant messaging should not be used as a method where a record for decision making is required
  - Action (underway): update records and information management policy to align with the Province
  - Action (underway): incorporate guidance for Microsoft Teams chats in policy
  - Action (planned): implement new annual training
17. Recommendation: consider establishing a Provider Code of Conduct, which can be incorporated into BC Housing's operating agreements, that includes the following elements: request and communication protocols, minimum standard required information for funding requests, and COI policies.
- Action (under analysis): BC Housing to work with Ministry of Housing and non-profit housing sector to analyze options to meet this recommendation
18. Recommendation: distribute and obtain written acceptance of the Provider Code of Conduct from existing and future Providers.
- Action (under analysis): BC Housing to work with Ministry of Housing and non-profit housing sector to analyze options to meet this recommendation
19. Recommendation: update the language in the Standards of Conduct policy to align with the expectations set forth in the Provider Code of Conduct.
- Action (under analysis): BC Housing to work with Ministry of Housing and non-profit housing sector to analyze options to meet this recommendation

20. Recommendation: incorporate into the employee Standards of Conduct the expectation that employees are to ensure that their actions promote Provider compliance with the Provider Code of Conduct.

- Action (under analysis): BC Housing to work with Ministry of Housing and non-profit housing sector to analyze options to meet this recommendation

**Contact:**

Jimmy Smith  
Deputy Communications Director  
Office of the Premier  
Jimmy.Smith@gov.bc.ca

Ministry of Housing  
Media Relations  
236 478-0251

## RE: New media in halls/no heads up

---

From: Smith, George PREM:EX  
To: Gostelow, Tara GCPE:EX <Tara.Gostelow@gov.bc.ca>, Smith, Jimmy PREM:EX <Jimmy.Smith@gov.bc.ca>  
Sent: May 8, 2023 9:53:05 AM PDT  
She's misunderstood what he's doing. It's Jen St Denis – they are here to follow the BC Housing report

---

**From:** Gostelow, Tara GCPE:EX <Tara.Gostelow@gov.bc.ca>  
**Sent:** Monday, May 8, 2023 9:48 AM  
**To:** Smith, George PREM:EX <George.Smith@gov.bc.ca>; Smith, Jimmy PREM:EX <Jimmy.Smith@gov.bc.ca>  
**Subject:** Fwd: New media in halls/no heads up

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---

**From:** Gostelow, Tara GCPE:EX <Tara.Gostelow@gov.bc.ca>  
**Sent:** Monday, May 8, 2023 9:47:09 AM  
**To:** Richard Zussman <[richard.zussman@globalnews.ca](mailto:richard.zussman@globalnews.ca)>  
**Subject:** New media in halls/no heads up

Morning!

Melissa says Andrew MacLeod is chasing ministers with a new reporter from Glacier media (she says)

I haven't gotten any heads up - any intel on your side?

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## Docs

---

From: Smith, George PREM:EX  
To: Sali, Meghan PREM:EX <Meghan.Sali@gov.bc.ca>  
Sent: May 8, 2023 9:57:40 AM PDT  
Attachments: Table of Redacted Records - OCG BC Housing Report.pdf, Office of the Comptroller General - Investigation of BC Housing - March 6, 2023.pdf, NR\_BG\_BC Housing EY Report - 8MAY23\_927am\_.docx

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## KMs for MLAs

---

From: Hannah, Jeff GCPE:EX <Jeff.Hannah@gov.bc.ca>  
To: Smith, Jimmy PREM:EX <Jimmy.Smith@gov.bc.ca>, Smith, George PREM:EX <George.Smith@gov.bc.ca>, Madoc-Jones, Sian HOUS:EX <Sian.MadocJones@gov.bc.ca>, Sidhu-Umar, Kiran HOUS:EX <Kiran.Sidhu-Umar@gov.bc.ca>  
Cc: Marriott, Sarah GCPE:EX <Sarah.Marriott@gov.bc.ca>, Howlett, Tim GCPE:EX <Tim.Howlett@gov.bc.ca>  
Sent: May 8, 2023 10:07:30 AM PDT  
Attachments: DRAFT - MLA KMQA EY Report.docx  
Attached is a condensed KMQA for MLAs. Hoping for PO review on it

Thanks,

Jeff

**Key Messages:**

s.13; s.17; s.22

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s.13 ; s.17 ; s.22

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Withheld pursuant to/removed as

s.13 ; s.17 ; s.22

## PDE - House remarks

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From: Smith, George PREM:EX  
To: Richard.Zussman@globalnews.ca  
Sent: May 8, 2023 10:26:04 AM PDT  
Attachments: PDE House remarks Final 9.15am.docx  
Please check against delivery

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**RE: Final coming ASAP - Approved for PREM - For Final review/Approval - PREM/HOUS NR + BG - DRAFT:** <sup>s.13</sup>

s.13

---

**From:** Stagg, Linda R GCPE:EX <Linda.Stagg@gov.bc.ca>  
**To:** Schollen, Tasha GCPE:EX <Tasha.Schollen@gov.bc.ca>, Smith, George PREM:EX <George.Smith@gov.bc.ca>  
**Cc:** Suddaby, Clay GCPE:EX <Clay.Suddaby@gov.bc.ca>, Butler, Liam GCPE:EX <Liam.Butler@gov.bc.ca>, Smith, Jimmy PREM:EX <Jimmy.Smith@gov.bc.ca>, GCPE Writing and Content Strategy <WCSTRAT@Victoria1.gov.bc.ca>, Walker, Alexa GCPE:EX <Alexa.Walker@gov.bc.ca>, Belanger, Matthew GCPE:EX <Matthew.Belanger@gov.bc.ca>, Cowan, Cale GCPE:EX <Cale.Cowan@gov.bc.ca>, Kerr, Grant GCPE:EX <Grant.Kerr@gov.bc.ca>, Plan, Jake GCPE:EX <Jake.Plan@gov.bc.ca>  
**Sent:** May 8, 2023 10:34:47 AM PDT  
Thank you, Tasha.

---

**From:** Schollen, Tasha GCPE:EX <Tasha.Schollen@gov.bc.ca>  
**Sent:** Monday, May 8, 2023 10:34 AM  
**To:** Stagg, Linda R GCPE:EX <Linda.Stagg@gov.bc.ca>; Smith, George PREM:EX <George.Smith@gov.bc.ca>  
**Cc:** Suddaby, Clay GCPE:EX <Clay.Suddaby@gov.bc.ca>; Butler, Liam GCPE:EX <Liam.Butler@gov.bc.ca>; Smith, Jimmy PREM:EX <Jimmy.Smith@gov.bc.ca>; GCPE Writing and Content Strategy <WCSTRAT@Victoria1.gov.bc.ca>; Walker, Alexa GCPE:EX <Alexa.Walker@gov.bc.ca>; Belanger, Matthew GCPE:EX <Matthew.Belanger@gov.bc.ca>; Cowan, Cale GCPE:EX <Cale.Cowan@gov.bc.ca>; Kerr, Grant GCPE:EX <Grant.Kerr@gov.bc.ca>; Plan, Jake GCPE:EX <Jake.Plan@gov.bc.ca>  
**Subject:** RE: Approved for PREM - For Final review/Approval -PREM/HOUS NR + BG - DRAFT: <sup>s.13</sup>

s.13

No other fixes that we see, Linda. Thank you.

---

**From:** Stagg, Linda R GCPE:EX <Linda.Stagg@gov.bc.ca>  
**Sent:** Monday, May 8, 2023 10:34 AM  
**To:** Smith, George PREM:EX <George.Smith@gov.bc.ca>; Schollen, Tasha GCPE:EX <Tasha.Schollen@gov.bc.ca>  
**Cc:** Suddaby, Clay GCPE:EX <Clay.Suddaby@gov.bc.ca>; Butler, Liam GCPE:EX <Liam.Butler@gov.bc.ca>; Smith, Jimmy PREM:EX <Jimmy.Smith@gov.bc.ca>; GCPE Writing and Content Strategy <WCSTRAT@Victoria1.gov.bc.ca>; Walker, Alexa GCPE:EX <Alexa.Walker@gov.bc.ca>; Belanger, Matthew GCPE:EX <Matthew.Belanger@gov.bc.ca>; Cowan, Cale GCPE:EX <Cale.Cowan@gov.bc.ca>; Kerr, Grant GCPE:EX <Grant.Kerr@gov.bc.ca>; Plan, Jake GCPE:EX <Jake.Plan@gov.bc.ca>  
**Subject:** RE: Approved for PREM - For Final review/Approval -PREM/HOUS NR + BG - DRAFT: <sup>s.13</sup>

s.13

s.13

Linda Stagg  
Senior Editor, Editorial Services | Corporate Priorities  
Government Communications and Public Engagement  
Mobile: 250 882-8673

---

**From:** Smith, George PREM:EX <George.Smith@gov.bc.ca>  
**Sent:** Monday, May 8, 2023 10:30 AM  
**To:** Stagg, Linda R GCPE:EX <Linda.Stagg@gov.bc.ca>; Schollen, Tasha GCPE:EX <Tasha.Schollen@gov.bc.ca>  
**Cc:** Suddaby, Clay GCPE:EX <Clay.Suddaby@gov.bc.ca>; Butler, Liam GCPE:EX <Liam.Butler@gov.bc.ca>; Smith, Jimmy PREM:EX <Jimmy.Smith@gov.bc.ca>; GCPE Writing and Content Strategy <WCSTRAT@Victoria1.gov.bc.ca>; Walker, Alexa GCPE:EX <Alexa.Walker@gov.bc.ca>; Belanger, Matthew GCPE:EX <Matthew.Belanger@gov.bc.ca>; Cowan, Cale GCPE:EX <Cale.Cowan@gov.bc.ca>; Kerr, Grant GCPE:EX <Grant.Kerr@gov.bc.ca>; Plan, Jake GCPE:EX <Jake.Plan@gov.bc.ca>  
**Subject:** RE: For Final review/Approval -PREM/HOUS NR + BG - DRAFT: <sup>s.13</sup>

s.13

s.13

Then approved to go.

---

**From:** Stagg, Linda R GCPE:EX <[Linda.Stagg@gov.bc.ca](mailto:Linda.Stagg@gov.bc.ca)>

**Sent:** Monday, May 8, 2023 10:29 AM

**To:** Schollen, Tasha GCPE:EX <[Tasha.Schollen@gov.bc.ca](mailto:Tasha.Schollen@gov.bc.ca)>

**Cc:** Suddaby, Clay GCPE:EX <[Clay.Suddaby@gov.bc.ca](mailto:Clay.Suddaby@gov.bc.ca)>; Butler, Liam GCPE:EX <[Liam.Butler@gov.bc.ca](mailto:Liam.Butler@gov.bc.ca)>; Smith, Jimmy PREM:EX <[Jimmy.Smith@gov.bc.ca](mailto:Jimmy.Smith@gov.bc.ca)>; Smith, George PREM:EX <[George.Smith@gov.bc.ca](mailto:George.Smith@gov.bc.ca)>; GCPE Writing and Content Strategy <[WCSTRAT@Victoria1.gov.bc.ca](mailto:WCSTRAT@Victoria1.gov.bc.ca)>; Walker, Alexa GCPE:EX <[Alexa.Walker@gov.bc.ca](mailto:Alexa.Walker@gov.bc.ca)>; Belanger, Matthew GCPE:EX <[Matthew.Belanger@gov.bc.ca](mailto:Matthew.Belanger@gov.bc.ca)>; Cowan, Cale GCPE:EX <[Cale.Cowan@gov.bc.ca](mailto:Cale.Cowan@gov.bc.ca)>; Kerr, Grant GCPE:EX <[Grant.Kerr@gov.bc.ca](mailto:Grant.Kerr@gov.bc.ca)>; Plan, Jake GCPE:EX <[Jake.Plan@gov.bc.ca](mailto:Jake.Plan@gov.bc.ca)>

**Subject:** FW: For Final review/Approval -PREM/HOUS NR + BG - DRAFT: s.13

s.13

Hello, Everyone –

Here is the NR + BG to go ASAP on Approval.

s.13

Linda Stagg

Senior Editor, Editorial Services | Corporate Priorities  
Government Communications and Public Engagement  
Mobile: 250 882-8673

---

**From:** Stagg, Linda R GCPE:EX <[Linda.Stagg@gov.bc.ca](mailto:Linda.Stagg@gov.bc.ca)>

**Sent:** Monday, May 8, 2023 10:24 AM

**To:** Stagg, Linda R GCPE:EX <[Linda.Stagg@gov.bc.ca](mailto:Linda.Stagg@gov.bc.ca)>

**Subject:** DRAFT s.13

Please refer to the files attached to this email. The following is the summary of the News Release

NR Number: Not Approved

NR Type: News Release

State: Planned

Planned Release Date: May 8, 2023 at 11:00 am

Media Distribution Lists: 000.0 - Victoria, 000.1 - Burnaby, 000.2 - Vancouver, BUSIN\_BUSINESS, CCM\_ALL CULTURAL COMM

No Lead Organization

Headline: s.13

This email was auto-generated.

Not Approved

May 8, 2023

Office of the Premier

Ministry of Housing

NEWS RELEASE

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Jimmy Smith  
Deputy Communications Director  
Office of the Premier  
[Jimmy.Smith@gov.bc.ca](mailto:Jimmy.Smith@gov.bc.ca)

Ministry of Housing  
Media Relations  
236 478-0251

Connect with the Province of B.C. at: <http://news.gov.bc.ca/connect>

## RE: FInal - PREM/HOUS NR + BG - Province, BC Housing taking action on recommendations from forensic investigation

---

From: Schollen, Tasha GCPE:EX <Tasha.Schollen@gov.bc.ca>  
To: Smith, George PREM:EX <George.Smith@gov.bc.ca>, Stagg, Linda R GCPE:EX <Linda.Stagg@gov.bc.ca>  
Cc: Suddaby, Clay GCPE:EX <Clay.Suddaby@gov.bc.ca>, Butler, Liam GCPE:EX <Liam.Butler@gov.bc.ca>, Smith, Jimmy PREM:EX <Jimmy.Smith@gov.bc.ca>, GCPE Writing and Content Strategy <WCSTRAT@Victoria1.gov.bc.ca>, Walker, Alexa GCPE:EX <Alexa.Walker@gov.bc.ca>, Belanger, Matthew GCPE:EX <Matthew.Belanger@gov.bc.ca>, Cowan, Cale GCPE:EX <Cale.Cowan@gov.bc.ca>, Kerr, Grant GCPE:EX <Grant.Kerr@gov.bc.ca>, Plan, Jake GCPE:EX <Jake.Plan@gov.bc.ca>  
Sent: May 8, 2023 10:47:54 AM PDT  
I just got it.

---

**From:** Smith, George PREM:EX <George.Smith@gov.bc.ca>  
**Sent:** Monday, May 8, 2023 10:46 AM  
**To:** Stagg, Linda R GCPE:EX <Linda.Stagg@gov.bc.ca>; Schollen, Tasha GCPE:EX <Tasha.Schollen@gov.bc.ca>  
**Cc:** Suddaby, Clay GCPE:EX <Clay.Suddaby@gov.bc.ca>; Butler, Liam GCPE:EX <Liam.Butler@gov.bc.ca>; Smith, Jimmy PREM:EX <Jimmy.Smith@gov.bc.ca>; GCPE Writing and Content Strategy <WCSTRAT@Victoria1.gov.bc.ca>; Walker, Alexa GCPE:EX <Alexa.Walker@gov.bc.ca>; Belanger, Matthew GCPE:EX <Matthew.Belanger@gov.bc.ca>; Cowan, Cale GCPE:EX <Cale.Cowan@gov.bc.ca>; Kerr, Grant GCPE:EX <Grant.Kerr@gov.bc.ca>; Plan, Jake GCPE:EX <Jake.Plan@gov.bc.ca>  
**Subject:** Re: FInal - PREM/HOUS NR + BG - Province, BC Housing taking action on recommendations from forensic investigation

Please let us know once it has been released.

-

**George Smith (he/him)**  
Director of Communications  
Office of the Premier  
250-208-6794

---

**From:** Stagg, Linda R GCPE:EX <Linda.Stagg@gov.bc.ca>  
**Sent:** Monday, May 8, 2023 10:40:06 AM  
**To:** Schollen, Tasha GCPE:EX <Tasha.Schollen@gov.bc.ca>  
**Cc:** Smith, George PREM:EX <George.Smith@gov.bc.ca>; Suddaby, Clay GCPE:EX <Clay.Suddaby@gov.bc.ca>; Butler, Liam GCPE:EX <Liam.Butler@gov.bc.ca>; Smith, Jimmy PREM:EX <Jimmy.Smith@gov.bc.ca>; GCPE Writing and Content Strategy <WCSTRAT@Victoria1.gov.bc.ca>; Walker, Alexa GCPE:EX <Alexa.Walker@gov.bc.ca>; Belanger, Matthew GCPE:EX <Matthew.Belanger@gov.bc.ca>; Cowan, Cale GCPE:EX <Cale.Cowan@gov.bc.ca>; Kerr, Grant GCPE:EX <Grant.Kerr@gov.bc.ca>; Plan, Jake GCPE:EX <Jake.Plan@gov.bc.ca>  
**Subject:** FW: FInal - PREM/HOUS NR + BG - Province, BC Housing taking action on recommendations from forensic investigation

Thank you, Tasha and George –

Here is the Final of the Housing NR + BG – going Everywhere as soon as we can get the buttons pushed.

Linda Stagg  
Senior Editor, Editorial Services | Corporate Priorities  
Government Communications and Public Engagement  
Mobile: 250 882-8673

---

**From:** Stagg, Linda R GCPE:EX <Linda.Stagg@gov.bc.ca>  
**Sent:** Monday, May 8, 2023 10:35 AM  
**To:** Stagg, Linda R GCPE:EX <Linda.Stagg@gov.bc.ca>  
**Subject:** Province, BC Housing taking action on recommendations from forensic investigation

Please refer to the files attached to this email. The following is the summary of the News Release

Permalink: <https://news.gov.bc.ca/28736>

News ID: NEWS-28736

NR Number: 2023HOUS0026-000683

NR Type: News Release

State: Planned

Planned Release Date: May 8, 2023 at 11:00 am

Media Distribution Lists: 000.0 - Victoria, 000.1 - Burnaby, 000.2 - Vancouver, BUSIN\_BUSINESS, CCM\_ALL CULTURAL COMM

Lead Organization: Ministry of Housing

Headline: Province, BC Housing taking action on recommendations from forensic investigation

This email was auto-generated.

For Immediate Release  
2023HOUS0026-000683  
May 8, 2023

Office of the Premier  
Ministry of Housing

#### NEWS RELEASE

Province, BC Housing taking action on recommendations from forensic investigation

VICTORIA - A new forensic investigation of BC Housing tabled in the legislature has found mismanagement related to a conflict of interest.

The independent investigation identified 20 recommendations to improve financial oversight, prevent conflicts of interest, and ensure accountability.

"We expect the rules to be followed. There must be strong safeguards in place to preserve the public's trust," said Premier David Eby. "We are committed to ensuring that the public's trust is maintained and that the public's money is used responsibly."

In March 2021, Premier Eby, then-Minister Responsible for Housing, ordered an external review be conducted of financial and operational management.

During the course of the initial review, further concerns came to light that were outside the scope of that review. In July 2022, at the request of the Premier, a new independent investigation was commissioned.

"We're building a record amount of housing, but we need to do even more. That means our organizations must be equipped to properly manage the public's money."

While the financial investigation found no evidence of public funds being dispersed outside of their intended purpose or to provide material benefits to individuals, it did find evidence of mismanagement.

BC Housing has already taken steps to enhance its financial accounting capabilities, policies and processes, stemming from last year's external review.

Work is complete or underway on all recommendations and will be fully implemented by spring 2024. This work includes:

- \* creation of an anonymous employee whistleblower hotline (complete);
- \* changes at the executive committee level to ensure enhanced controls in the way that projects are approved (complete);
- \* enhanced governance and oversight through new processes and structures created with the new Ministry of Housing (complete/underway);
- \* a government representative on the board (complete);
- \* strengthened standards of conduct/conflict of interest policies including annual mandatory training with policies overseen and reviewed by the board (complete);
- \* changes regarding how budget and financial reviews of housing providers are completed, including expected timelines and mechanisms (in progress);
- \* enhanced tracking and reporting to the board of the budget and financial review process (in progress).

"The board recognizes the serious nature of the issues identified in this report, along with the report released last summer. That is why I

BC Housing and government will be exercising its full rights under the Operator and Operating Agreements with Atira to carry out the

- \* reviewing Atira Women's Resources Society (AWRS) and Atira Development Society (ADS) and its financial transactions with relat
- \* restricting any new funding to AWRS and ADS until the operational review is complete and concerns are addressed. Atira will not be
- \* suspending the renewal of all AWRS operating and operator agreements until the review is complete; and
- \* physically inspecting all Atira-operated buildings, beginning May 9, 2023.

Learn More:

To read the forensic review of BC Housing, visit:

[https://news.gov.bc.ca/files/ComptrollerGeneral\\_Investigation\\_BCHousing\\_6March2023.pdf](https://news.gov.bc.ca/files/ComptrollerGeneral_Investigation_BCHousing_6March2023.pdf)

To read the list of forensic review redactions, visit:

[https://news.gov.bc.ca/files/Table\\_RedactedRecords\\_OCG\\_BCHousingReport.pdf](https://news.gov.bc.ca/files/Table_RedactedRecords_OCG_BCHousingReport.pdf)

A backgrounder follows.

Contacts:

Jimmy Smith  
Deputy Communications Director  
Office of the Premier  
[Jimmy.Smith@gov.bc.ca](mailto:Jimmy.Smith@gov.bc.ca)

Ministry of Housing  
Media Relations  
236 478-0251

## BACKGROUNDER

### BC Housing steps to implement recommendations

Under the guidance of the new Board of Commissioners, BC Housing has developed a comprehensive response plan to the 2022 external

#### Recommendations and Corresponding Actions

1. Recommendation: consider strengthening the current conflict of interest (COI) policies to explicitly prohibit a COI of this magnitude
  - \* Action (complete): incorporated into BC Housing's updated Standards of Conduct Policy
2. Recommendation: consider updating the Standards of Conduct to clarify that employees, including members of Executive Committee
  - \* Action (complete): incorporated into BC Housing's updated Standards of Conduct Policy
  - \* Action (underway): implementation plan to include strengthened annual training, communication from Board Chair to all employees,
3. Recommendation: consider implementing an anonymous whistleblower hotline to provide employees the opportunity to report on malconduct
  - \* Action (complete): whistleblower hotline has been established and training has been implemented
  - \* Action (complete): incorporated into BC Housing's updated Standards of Conduct Policy
  - \* Action (underway): Board Chair communication on standards of conduct to reinforce whistleblower protections is underway; CEO co
4. Recommendation: consider implementing annual, organization-wide COI training, including continued annual signoff of the Standards of Conduct
  - \* Action (complete): incorporated into BC Housing's updated Standards of Conduct Policy.

- \* Action (underway): mandatory standards sign off for all BC Housing employees by May 2023
  - \* Action (underway): sign off through oath taking by senior leadership by May 2023
5. Recommendation: consider implementing a process to ensure that the Standards of Conduct are reviewed by the Board of Commissioners
- \* Action (complete): incorporated into BC Housing's updated Standards of Conduct Policy
  - \* Action (complete): updated Board of Commissioners Terms of Reference approved
6. Recommendation: consider requiring Providers to submit ongoing financial information. At a minimum, this should include quarterly financial statements
- \* Action (under consideration): BC Housing will work with Ministry of Housing and the not-for-profit sector to strengthen reporting, with a view to developing a standard for the sector
7. Recommendation: consider establishing a formal structure and documented procedures outlining how budget and financial reviews are conducted
- \* Action (underway): initiate process for revising financial oversight and budget process, which will incorporate feedback from engaged stakeholders
  - \* Action (underway): implement changes to financial review and budgeting processes identified as part of BC Housing's Business Transformation Program
  - \* Action (planned): identify IT solutions for processes that are currently manual
8. Recommendation: consider requiring that financial reviews are completed prior to analyzing and approving budget requests for subsequent periods
- \* Action (underway): update process and procedures to address this issue and reflect the need for funding certainty while financial reviews are completed
  - \* Action (planned): amend operating agreements to reflect process change
9. Recommendation: consider developing a status tracking framework, including key performance indicators and oversight responsibilities
- \* Action (complete): BC Housing tracking status of financial reviews
  - \* Action (underway): enhanced reporting of the status of financial reviews to the Board of Commissioners
10. Recommendation: consider restructuring financial reviews to be under Audit Advisory Services' (AAS) purview, given AAS's mandate
- \* Action (underway): BC Housing will develop a new interim model of undertaking financial reviews
  - \* Action (underway): introduction of new manager role with accounting and finance experience
  - \* Action (underway): analyze organizational and staff roles within the financial review process
11. Recommendation: prioritize hiring additional individuals with an accounting and/or finance background to supplement both the AAS and BC Housing
- \* Action (underway): retain firm to support advancing finance-related projects as part of Business Transformation Program
  - \* Action (planned): BC Housing to incorporate review of job descriptions and roles into organizational analysis underway
  - \* Action: (planned): deliver enhanced training for staff
12. Recommendation: consider if steps can be taken to simplify the funding models utilized by BC Housing to promote more efficient processes
- \* Action (planned): BC Housing to work with the Ministry of Housing to review funding program requirements
13. Recommendation: consider implementing additional preventative controls within BC Housing's information systems to require explicit approval for changes
- \* Action (underway): BC Housing to incorporate consideration into review of Executive Committee terms of reference
14. Recommendation: consider implementing a triaging protocol whereby, in the event that BC Housing becomes aware of an actual or potential compliance issue, the issue is escalated to the attention of the Vice President of Operations, who will then determine the appropriate response
- \* Action (underway): interim triaging protocol to escalate any compliance issue to the attention of the Vice President of Operations, who will then determine the appropriate response

\* Action (underway): development of framework for the formal assessment process - Planned

\* Action (planned): procedures updated to replace external legal counsel with General Counsel once office established

15. Recommendation: consider implementing a process whereby quantitatively or qualitatively significant Executive Committee submissions

\* Action (underway): incorporate into Executive Committee terms of reference

\* Action (underway): improved processes for Executive Committee to review reports

\* Action (planned): implement subcommittee structure for ExCom to ensure focused time to consider submissions

16. Recommendation: consider limiting business decision-making to formal communication methods such as email and virtual/in-person

\* Action (underway): incorporate into Executive Committee terms of reference

\* Action (underway): document practice that texts and instant messaging should not be used as a method where a record for decision making

\* Action (underway): update records and information management policy to align with the Province

\* Action (underway): incorporate guidance for Microsoft Teams chats in policy

\* Action (planned): implement new annual training

17. Recommendation: consider establishing a Provider Code of Conduct, which can be incorporated into BC Housing's operating agreement

\* Action (under analysis): BC Housing to work with Ministry of Housing and non-profit housing sector to analyze options to meet this

18. Recommendation: distribute and obtain written acceptance of the Provider Code of Conduct from existing and future Providers.

\* Action (under analysis): BC Housing to work with Ministry of Housing and non-profit housing sector to analyze options to meet this

19. Recommendation: update the language in the Standards of Conduct policy to align with the expectations set forth in the Provider Code

\* Action (under analysis): BC Housing to work with Ministry of Housing and non-profit housing sector to analyze options to meet this

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Ministry of Housing  
Media Relations  
236 478-0251

Connect with the Province of B.C. at: <http://news.gov.bc.ca/connect>

**FW: MEDIA ADVISORY – Office of the Premier; Ministry of Housing – Victoria; teleconference**

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From: Smith, George PREM:EX <George.Smith@gov.bc.ca>  
To: Machell, Aileen PREM:EX <Aileen.Machell@gov.bc.ca>  
Sent: May 8, 2023 11:01:04 AM PDT  
Cant find the link – it's on global

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**From:** noreply.newsondemand@gov.bc.ca <noreply.newsondemand@gov.bc.ca>  
**Sent:** Sunday, May 7, 2023 6:01 PM  
**To:** GCPE Minis <GCPEMINIS@gov.bc.ca>  
**Subject:** MEDIA ADVISORY – Office of the Premier; Ministry of Housing – Victoria; teleconference

For Immediate Release

May 7, 2023

Office of the Premier  
Ministry of Housing

**MEDIA ADVISORY**

VICTORIA - Media are invited to join Premier David Eby and Ravi Kahlon, Minister of Housing, for an announcement about the results of a forensic investigation of BC Housing.

Event date: Monday, May 8, 2023

Time: 11 a.m. (Pacific time)

Location:  
Parliament Buildings  
Press Theatre  
501 Belleville St.  
Victoria

Media dial-in information:  
From anywhere in B.C. and Canada, toll-free: 1 888 892-3255  
Participant pass code: 120670

Special instructions:  
Media are requested to dial in 20 minutes prior to the announcement and have the participant pass code ready. Failure to do this may mean a delay in you or others joining the call.

Contacts:

Jimmy Smith  
Deputy Communications Director  
Office of the Premier  
[Jimmy.Smith@gov.bc.ca](mailto:Jimmy.Smith@gov.bc.ca)

Ministry of Housing  
Media Relations  
236 478-0251

## FW: BDO IN

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From: Madoc-Jones, Sian HOUS:EX <Sian.MadocJones@gov.bc.ca>  
To: Smith, George PREM:EX <George.Smith@gov.bc.ca>  
Sent: May 8, 2023 12:41:48 PM PDT  
Attachments: IN\_EY and BDO Reports\_27Jan2023\_FNL.docx

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**From:** Suddaby, Clay GCPE:EX <Clay.Suddaby@gov.bc.ca>  
**Sent:** Monday, May 8, 2023 10:35 AM  
**To:** Madoc-Jones, Sian HOUS:EX <Sian.MadocJones@gov.bc.ca>  
**Subject:** BDO IN

**Clay Suddaby** (he/him)  
Communications Director  
Ministry of Housing  
Government Communications & Public Engagement  
Mobile: 250-380-8947

*I gratefully acknowledge that I live and work on the traditional unceded territory of the Lekwungen Peoples, specifically the Songhees and Esquimalt First Nations. Hay'sxw'qu Si'em*

## ISSUES NOTE: Ministry of Housing 2023-01-27

### Ernst & Young Report and BDO Report

#### SUGGESTED RESPONSE:

- The breadth and scope of BC Housing's activities has increased substantially since 2018, when the Province released Homes for BC: A 30-Point Plan for Housing Affordability in British Columbia.
- BC Housing continues to support the delivery of government's progressive and ambitious housing policy, including meeting specific affordable and social housing targets.
- In late 2021, government initiated a review of BC Housing's organizational capacity and financial systems to ensure that BC Housing can continue to deliver on its expanded mandate and budget.
- This review was completed by external consultant Ernst & Young.
- The review resulted in 26 findings and 44 recommendations across five themes: governance, strategic planning and business integration, human resources, program design, and project administration processes.
- The findings identify opportunities to gain efficiencies and create more capacity within BC Housing to match organizational growth. They also outline how BC Housing's overall service delivery and accountability structures can be improved.
- The findings in the report point to the need for greater clarity in governance roles, structures and processes, more detailed policy direction on program outcomes, and greater collaboration between government and BC Housing to integrate strategic policy direction with program design and delivery.
- Government is working with BC Housing to address the findings in the report.

## **ISSUES NOTE: Ministry of Housing 2023-01-27**

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## ISSUES NOTE: Ministry of Housing 2023-01-27

### **BACKGROUND:**

#### **EY Report:**

The Province initiated a review of BC Housing to look at the agency's organizational capacity and financial systems and controls, and to ensure they are appropriately supported to deliver on their expanded budget and mandate.

Conducted by external consultant Ernst and Young, the review identified 26 findings and 44 recommendations across five themes: governance, strategic planning and business integration, human resources, program design and project administration processes.

BC Housing's breadth and scope of activities has increased substantially since 2018, when the Province released Homes for BC: A 30-Point Plan for Housing Affordability in British Columbia, committing to provide 114,000 units over 10 years. BC Housing is responsible for approximately 31,000 of these units, and their mandate also includes helping implement government's ambitious housing policy, with specific affordable and social housing targets.

#### **BDO Report:**

In September 2017, BC Housing and Atira jointly initiated a financial review of Atira using BDO as the external consultant. The review scope was focused on addressing some outstanding issues related to Atira budgets for fiscal years ending March 31, 2012 to March 31, 2018. While the review was underway, approval was deferred for the budget items that were under review.

s.17

s.13

Program Area	Deputy / ADM	GCPE
Alanna Dixon, CAS – Jan. 25, 2023 John Thomson, CAS – Jan. 25, 2023 S. Maxson, OHCS – Jan. 25, 2023	B. Ruscheinski – Jan. 26, 2023 T. Collins – Jan. 27, 2023	L. Butler – Jan. 25, 2023 T. Schollen – Jan. 27, 2023 C. Suddaby – Jan. 27, 2023

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