Audit of the Management of Elder Services

August 5, 2022





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Background

Role of Elders

What is a CSC Elder?

What are the Elders roles?

Elders Contracted to Provide Services at CSC 2021-2022

According to Correctional Service of Canada's (CSC) Commissioner's Directive 702, an Elder is any person recognized by an Indigenous community as having knowledge and understanding of the traditional culture of the community, including the physical manifestations of the culture of the people and their spiritual and social traditions and ceremonies. Knowledge and wisdom, coupled with the recognition and respect of the people of the community, are the essential defining characteristics of an Elder/Spiritual Advisor.

Elders play a crucial role within Indigenous cultures and CSC contracts Elders to provide services to offenders interested in following a traditional healing path. A traditional Aboriginal healing process based on culture and beliefs, which encompasses a life-long spiritual, emotional and/or psychological journey whereby one strives to be in harmony with all living things on Mother Earth. The telling of stories, sharing of traditional teachings and participation in sacred ceremonies serve to assist the individual in following the Red Road to healing. When one lives and walks the Red Road, one is seen and deemed to be whole in body, mind, spirit, emotions and behaviour.

Elders provide services in 12 areas, including ceremonial and spiritual services, advice and guidance, as well as in case management (a more detailed list can be found in Annex D).

Region	Contracted Elders as of September 2021	Offenders following Traditional Healing Path as of January 2022	Ratio Offender following Traditional Healing Path to Elder # offenders/Elder	
Atlantic	10	275	28	
Quebec	15	330	22	
Ontario	16	557	35	
Prairies	59	1,587	27	
Pacific	25	547	22	

Source: RADAR-PRIME- ACAF Reports Mid-Year 21-22

Indigenous Offenders

The introduction of the Corrections and Conditional Release Act (CCRA) in 1992 redefined the relationship between CSC and Indigenous peoples.

According to the 2016 Canadian census, the Indigenous population represents 5% of the Canadian population. Indigenous people continue to be overrepresented in CSC's institutions, as of January 2022 they represent 32% of CSC's incarcerated population.

One of CSC's corporate priorities is to address the overrepresentation of Indigenous offenders by providing effective culturally appropriate interventions and reintegration support for First Nations, Metis and Inuit offenders.

Sections 79-84 of the CCRA outline CSC's obligations to provide programs designed specifically to address the needs of Indigenous offenders, to work with Indigenous communities in release planning of offenders, to recognize Elders with the same respect as other religious leaders, and to create a National Indigenous Advisory Committee to provide advice to CSC on the provision of correctional services to Indigenous offenders.

Offenders in CSC Custody 2020 - 2021

Region	Number of Offenders	Number of Indigenous Offenders	Percentage of Indigenous Offenders
Atlantic	1,048	219	21%
Quebec	2,573	395	15%
Ontario	3,405	665	20%
Prairies	3,717	2,057	55%
Pacific	1,662	658	40%
Total	12,405	3,994	32%

Source: Corporate Reporting System – Modernized (extracted January 2022)

CSC's National Indigenous Plan

What is the National Indigenous Plan?

In response to the 2016 Office of the Auditor General's report *Preparing Indigenous Offenders for Release*, CSC developed the National Indigenous Plan (NIP), which incorporates advice and guidance from the Auditor General and the National Indigenous Advisory Committee (NIAC). The NIP provides a national framework to transform Indigenous case management and corrections with an *Indigenous First* approach. The Plan includes streamlining existing Indigenous resources and services to ensure that Indigenous offenders have earlier access to parole and Indigenous interventions.

The National Indigenous Plan's Purpose

CSC's NIP is intended to transform Indigenous case management and corrections through enhancing various policies, operations and practices to better meet the needs of Indigenous offenders. Key components of the NIP include Indigenous Intervention Centres, policy amendments, Pathways, enhanced case management, Elder and liaison services, section 84/81 enhancement, Offender's Security Level reviews, and reintegration.

Audit Objectives and Scope

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Audit Objectives

Objective 1

To provide assurance that a management framework is in place to support the effective provision of Elder services to offenders.

Objective 2

To provide assurance that the financial and operational resources are being utilized to achieve the intended results.

Scope

The audit was national in scope and included one in person site visit, as well as virtual visits to all five regions and national headquarters (NHQ). The audit included men's and women's institutions of all security levels as well as healing lodges.

The audit excluded Section 81 healing lodges as the Elders who work at these facilities are subcontracted by the community partners, who directly manage operations on behalf of CSC.

Limitations

This audit was completed during the COVID-19 pandemic, which placed certain limitations on the audit. Due to government restrictions, the audit team could not travel to any institutions and therefore had to complete the audit virtually.

Approach



Interviews

154 interviews were conducted with Elders, management and staff at the national, regional, and local levels.



Review of Documentation

Relevant documentation including legislation, CDs, guidelines, Elder contracts, and corporate documentation, such as departmental plans, terms of reference of oversight committees, and monitoring and reporting information were reviewed.



File Review and Testing

173 parole and transfer decision files were selected to assess Elder input and completion of Elder reviews, assess ongoing progress, and to support case management decisions. 52 Elder contracts and 693 Elder invoices were examined to ensure compliance with policies and directives.

* Samples were selected from 2019-2020 and 2020-2021 fiscal years.

Audit Observations

CSC's Engagement with Elders - Governance



Finding: CSC has a policy framework and committees in place, to support Elders and the services they provide.

In order to provide the culturally appropriate services to the Indigenous population within the institutions, the audit team expected to find that CSC is engaged with Elders. The audit revealed that CSC is incorporating Elders in all aspects of Indigenous corrections. For example, CSC consults with Indigenous advisory groups, communities, and organizations to provide Indigenous offenders with spiritual and cultural support regarding case management, program delivery, health services, and reintegration.

Policy Framework

In consultation with Elders who partake in the national committees, CSC implemented numerous CDs and policies, as well as implementing the NIP; all of which align with CSC's mandate. CSC staff reported that these policies and guidelines are comprehensive and believe that they adequately support them in their roles and responsibilities relating to Elder services and Indigenous related activities.

The NIP was created by CSC in response to the OAG audit *Preparing Indigenous Offenders for Release*, which found CSC lacking in its interventions for Indigenous Offenders. The NIP is a national framework intended to transform case management and corrections with a key component being the implementation of Indigenous Intervention Centres.

Committees

National and regional committees are in place to provide oversight and advisory roles for Elder services.

National

- EXCOM Sub-committee on Indigenous Corrections;
- · National Indigenous Advisory Committee; and
- · National Elders Working Group.

The audit team reviewed the Terms of References and minutes for the identified national committees and concluded that the committees met as required and discussed a wide variety of topics relating to Elders and their respective services.

Regional

Three of the five regions have formed an Elder Council, primarily used for the vetting of potential Elders.

CSC's Engagement with Elders - Resourcing



Finding: There is an imbalance between the resource indicator, the funds allocated for Elder services and the actual number of Elders that sites indicate would be appropriate for their needs.

The audit team expected to find a strategic plan in place for the resourcing of Elders, which would be updated regularly to meet site needs.

Resource Indicator

A resource indicator was created in 2006 to determine the number of Elders assigned to an institution based on the number of Indigenous offenders at the site. This resource indicator has not been updated since its initial creation in 2006, even though the roles and responsibilities of the Elders have increased and expanded over time.

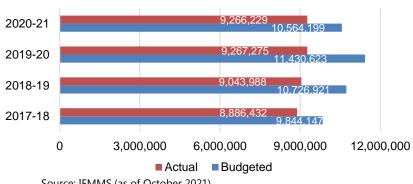
Budget Allocation

The audit confirmed that the funding for Elder services is distributed based on the resource indicator and the allocation is respected. However, the funding does not necessarily meet site needs. As a result, Regional Administrators, Indigenous Initiatives (RA IIs) have some flexibility in assigning the funding related to Elder services.

Despite Elders being allocated based on the resource indicator, 13 of the 15 sites (87%) selected for the audit, report that their institution does not have a sufficient number of Elders to provide the necessary services to the offenders interested in following a traditional healing path.

Although CSC has implemented a resource indicator for the resourcing of Elders, there is no strategic plan outlining Elder resourcing, funding and site requirements for Elder services.

Budgeted vs Actual for Elder Services



Source: IFMMS (as of October 2021)

CSC's Engagement with Elders – Identifying, Engaging and Selecting Elders



Finding: Although CSC is using a variety of mechanisms to identify, engage and select Elders and has established regional processes, it is still unable to identify, engage and select the desired number of Elders.

An effective and efficient system of identifying, engaging and selecting Elders is key to the success of Elder services. The audit team expected to find that CSC was able to engage a sufficient number of Elders.

How is CSC identifying, engaging and selecting Elders?

Identifying, engaging and selecting Elders is done regionally using a variety of mechanisms, such as word of mouth, posters, and broadcasts. According to interviewees, the most effective method is word of mouth; where Elders and Indigenous staff are attempting to identify new potential candidates when they are in their communities.

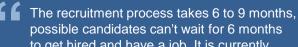
Vetting Process

In three of the five regions, there is an Elder Council for the vetting of potential Elders. The Elder Council provides a recommendation on potential candidates to the RA IIs. The other two regions do not have an Elder Council but look to CSC Elders to vet potential candidates.

According to interviewees, this vetting process is achieving the intended results by hiring Elders who are providing services, as required.

Challenges

Even though the majority of potential candidates who go through the vetting process are recommended to becoming Elders at CSC, CSC still has difficulty identifying, engaging and selecting the required number of Elders, based on the resource indicator. As a result, CSC lapses a significant amount of funds every year.



possible candidates can't wait for 6 months to get hired and have a job. It is currently happening where candidates will get a better job faster elsewhere.

- Elder

Based on interviews, some explanation for challenges in identifying, engaging and selecting Elders include:

- Elders do not want to work in an institutions:
- Elders do not want to leave their community to move closer to a CSC site:
- Elders find the contracting process is lengthy and onerous; and
- Uncertainty of job security from contracting on a yearly basis.

Elders' Ability to Deliver Services



Finding: There is an unequal workload distribution amongst Elders and challenges with Elders being able to provide all the services set out in their statement of work.

The audit expected to find that Elders were able to deliver services as outlined in their statement of work and that the workload of Elders at a site was evenly distributed.

Workload Distribution

There are several different areas for which an Elder can be assigned at a site, including: Structured Intervention Units, Pathways, Programs, General Population. As a result, the distribution of work amongst the Elders at a site is based on the area the Elder is assigned. The Elder working in the general population is typically the one with the greatest work load because they are working with and providing services to the most amount of offenders.

Challenges

47% of Elders interviewed indicated that they are exhausted and over worked either due to the insufficient number of Elders to meet the workload or the uneven distribution of work amongst the Elders at the site. Elders report competing priorities between completing administrative tasks such as case management and meeting the needs of the offenders, as well as providing interventions.

The audit team could not confirm Elder participation rates in programs and completion of administrative tasks due to a lack of measurement tools. CSC's challenges with identifying, engaging and selecting Elders, the numerous tasks and services Elders are to provide, along with an unequal distribution of work may contribute to Elders reports of overburden and inability to provide services in all areas.

Examples of Specific Areas of Challenge

Case Management

Elders' work includes participation in case management and interventions. 14 of the 15 sites indicated that Elders are always invited to case management discussions; however, they could not always attend due to competing priorities.

Elder Progress Reviews

Elders are also required to complete Elder reviews for each offender who is interested in following a traditional healing path. At the site level, interviewees stated that Elder reviews are not being completed on a regular basis or in a timely manner.

To provide context around these statements, the audit team reviewed 77 parole decisions and found that 31% had an Elder review on file within the last 6 months. 39% of the assessment for decisions used an Elder review. However, 60% of the files indicated that an Elder was consulted in the assessment for decision.

CSC's Ability to Manage and Support Elders



Finding: There is limited oversight of the management of Elder services, particularly with regard to the performance and service delivery.

The audit team expected to find that CSC records, monitors and reports on the services Elders provide and the administrative processes to support the Elders.

Performance Measurement

The sole performance measurement used for Elder services is the completion of initial Elder reviews, which is consistently reported in the Departmental Results Report. Elders provide other services, such as ceremonies, counselling, and advice to CSC management that are not measured or reported on.

None of the interviewees at the site level were aware of any reporting requirements relating to Elder services. Regional staff confirmed they track and report on results for Indigenous offenders, but nothing specific to Elders.

Managing the Work of Elders

The audit team concluded that there is no formal monitoring or reporting done in a consistent, systematic manner at a site level with respect to Elders services. However, 6 of the 15 sites selected for the audit are monitoring Elder reviews to ensure they are completed.

One cause may be linked to the lack of clarity with roles and responsibilities for Elder services by CSC staff at regional and site levels. Based on the site and regional interviews, it remains unclear as to who is responsible for ensuring that Elders provide services.

The RA IIs are the contract authorities for Elders; however, they are not physically located at the sites. Therefore, RA IIs indicated that management oversight for Elder services should be done at a site level. The audit found that management oversight for Elder services at the site level was inconsistent across regions.

In view of the limited management oversight, CSC cannot ensure that it is facilitating Elder services at site nor can it be sure that the Elder services are being provided consistently between sites and regions.

CSC's Administrative and Financial Controls



Finding: The information that is available to CSC is limited regarding Elders' fulfilling their contract, as such CSC can not confirm that the provision of services are completed as required nor that the services have been rendered in accordance with Elders contracts and statement of work.

According to the *Financial Administration Act*, section 34 approval is a key financial control to ensure that payment for an invoice is granted once the work or services have been rendered in accordance to the contract and its statement of work.

The audit team expected to find controls and systems in place to allow CSC oversight of financial and human resources relating to Elder services.

Contractual Obligations

CSC has implemented *Contracting Guidelines for Elders within CSC*, which respects the principles of fairness, openness and transparency while making efforts to respect traditional protocols and community practices where Elders are concerned.

The audit confirmed that regions use CSC's National Statement of Work and Contracting template. Four of the five regions are completing an evaluation of Elders' contract performance prior to contract renewal.

The RA II's in four of the five regions indicated that they track and monitor each Elders hours to ensure that they do not surpass the number of hours stated in their contract.

Financial Obligations

Section 34 approval for Elders services rests with the regions, specifically with the RA II as the assigned project authority. However, RA IIs are not on site to verify the provision of services.

There are inconsistencies with the verification process of invoices and section 34 approval process relating to the invoices for Elders.

- In one region, the sites verify the invoice/review the timesheet for accuracy before sending it to RHQ.
- In three regions, the Elders send their invoices directly to RHQ. In these regions, sites are rarely asked to verify timesheets for accuracy of hours or if the services were provided.
- For the last region, there are inconsistencies with the three sites selected relating to how the invoicing process works.

Having consistent documentation to support section 34 approval may provide opportunity for CSC to have greater knowledge or insight into the actual provision of services provided by Elders.

CSC's Ability to Manage during COVID-19

COVID-19 had profound impacts on the ability of CSC to provide Elder services. The examination phase of this audit occurred during the pandemic and the auditors were able to collect information and provide some observations.

In response to COVID-19

CSC implemented a National COVID-19 Integrated Risk Management Framework as part of their commitment to protecting the health and safety of staff, offenders, and the public in all of its operations. The goal of these mitigation strategies is to prevent the introduction of COVID-19 into an institution while minimizing the negative impacts of these strategies on the delivery of CSC's mandate.

Protocol

Through examining community and internal factors, CSC developed a protocol, which will change a site's COVID-19 risk level in accordance with the Integrated Management Framework. One of the principles established to guide the Shaping of the New Normal is that restoration of interventions, programs and services will be appropriate to the local level of the pandemic threat and tailored to the required response, in line with, national, provincial and territorial public health guidance.

Impacts on Elder services

Elder services were impacted at varying levels depending on the risk level at that time, at the site. At low-moderate risk levels, Elder services are permitted with COVID-19 protocols in place. However, once the risk level becomes moderate (or yellow) all employees and contractors who can work remotely, will work remotely. Access of Elders entering institutions is limited except for urgent or critical needs, sweat lodges, sacred pipe ceremonies, and other group ceremonies are suspended and virtual interventions, such as phone or videoconference, are encouraged where possible.

There were impacts reported by Elders due to the requirement to limit participant numbers in group activities. Decreasing the numbers per activity increased the amount of time the Elder required to complete the activity for all offenders; this added to the Elder's already heavy workload.

Interestingly, two sites indicated that although COVID-19 forced Elders to work in smaller groups, the Elders at those sites indicated that they now prefer that model as they can provide more individualized services.

Audit Conclusion

Audit Conclusion

CSC has made significant progress in including Elder Services into its operations, such as embedding the requirement of Elder services within policies, providing resources, ensuring attention at a senior management level, within the regions and at the sites. This has resulted in the increased Elder participation and involvement on sites.

Despite these efforts, interviewees indicated that the provision of Elder services is unable to meet offender needs and CSC's processes to identify, engage and select Elders is insufficient.

The auditors found that CSC's management framework lacks mechanisms to measure and track the provision of services and does not include controls to monitor the work done by Elders or the administration of these services by CSC staff.

This limits CSC's ability to determine if intended results are being achieved, to build on successes and address challenges in the provision of Elder services.

Recommendations and Management Response

Recommendation

1. The Senior Deputy Commissioner should review the Elder contracting model and explore alternative options to ensure that the approach is effective and efficient, as well as culturally appropriate.

Management Response

We agree with this recommendation. The SDC will undertake a review of the Elder contracting model and explore alternative options to ensure an effective and efficient model is used to engage Elders in providing culturally restorative services to federally incarcerated Indigenous Offenders (December 2023). In order to ensure a fulsome review the SDC will:

- In consultation with the EXCOM Sub-Committee on Indigenous Corrections, the SDC will
 review CSC's Elder contracting process and provide CSC with appropriate alternatives for the
 recruitment and management of Elder services.
- 2. Explore best practices for incorporating Indigenous participation in federal procurement processes, in consultation with other Government Departments (OGD) who act as Indigenous procurement coordinators.
- 3. Consult with the National Indigenous Advisory Committee (NIAC) and the National Elders Working Group (NEWG) to seek guidance throughout the review process.

2. The Senior Deputy Commissioner should strengthen the management framework by reviewing, clarifying and documenting the roles and responsibilities for the management of the Elder services to ensure its successful and consistent delivery. Specifically, accountability needs to be clearly assigned for the management oversight of Elder services, including contract management.

We agree with this recommendation. Following the conclusion of the external review of the Elder Services model, the SDC will review CSC's policy framework and the Elder Contracting Guidelines to identify any areas requiring strengthening to ensure appropriate management of Elder contracts throughout the Service. (March 2024)

- 1. IID will review CD 702 to ensure it supports the proper management of Elder Services.
- 2. IID, in collaboration with Contracting and Material Services, will review the Elder Contracting Guidelines to identify any areas requiring strengthening to ensure proper management of Elder Services throughout the organization.

Recommendations and Management Response

Recommendation	Management Response
3. The Senior Deputy Commissioner should ensure that there is a robust assessment process in place which effectively documents, monitors and reports contributions made to offender interventions through Elder Service contracts.	We agree with this recommendation. Elder Services are additive services, which are expected to contribute to enhanced outcomes for Indigenous offenders; however, they are not the sole determinant of success for various correctional results and rehabilitation outcomes. The counselling, cultural support, guidance and ceremonial services Elders provide may contribute to broadly defined global outcomes for Indigenous offenders following a traditional healing path, but should not be considered as the sole determinant to measure outcome success / failure. We agree, that there are opportunities, by incorporating the findings of evaluations, compliance reports and other review mechanisms, to enhance CSC's overarching approach in order to more effectively reflect the work and contributions of Elders. Therefore, the SDC will discuss appropriate ways in which CSC can more effectively document the contributions to offender interventions made through Elder contracts at fiscal year end. (March 2023).
4. Once recommendations 1 through 3 have been addressed, the Senior Deputy Commissioner should review the resource indicator to determine if the level of resourcing for Elder services is still adequate and relevant.	We agree with this recommendation. The SDC will undertake a review of resource indictors for Elder services upon completion of identified responses to Recommendations 1 through 3.

Annexes

Annex A: Audit Objective and Audit Criteria

Objective	Criteria	Audit Assessment
Objective 1 To provide assurance that a management framework is in place to support the effective provision of Elder services to offenders.	1.1 Governance – CSC has clearly defined and communicated strategic directions and objectives, aligned with CSC's mandate.	Met with Exceptions
	1.2 Roles and Responsibilities – Roles and responsibilities are defined, documented, communicated and understood.	Partially Met
	1.3 Resource requirements are established and align with strategic plans.	Partially Met
	1.4 Monitoring and Reporting – CSC has processes in place to measure performance.	Partially Met
Objective 2 To provide assurance that the financial and operational resources are being utilized to achieve the intended results.	2.1 CSC ensures that available resources are distributed in accordance with established plans.	Partially Met
	2.2 CSC has established processes to develop and manage Elder contracts.	Partially Met
	2.3 CSC facilitates access to Elder counselling, teachings and ceremonial services.	Met with Exceptions
	2.4 Elders are integrated into correctional interventions and case management.	Met with Exceptions

Annex B: Sites Selected

Regions	Site	
Atlantic	Dorchester Penitentiary	
	Nova Institution for Women	
Quebec	Archambault Institution	
	Federal Training Centre	
	Port Cartier Institution	
Ontario	Beaver Creek Institution	
	Grand Valley Institution for Women	
	Joyceville Institution	
Prairies	Bowden Institution	
	Edmonton Institution for Women	
	Okimaw Ochi Healing Lodge	
	Stony Mountain Institution	
Pacific	Kent Institution	
	Kwikwexwelhp Healing Village	
	Matsqui Institution	

Annex C: Legislation & Policy Framework

Legislative requirements and policy for Elder Services are contained within:

- Criminal Code of Canada:
- Corrections and Conditional Release Act;
- Corrections and Conditional Release Regulations;
- Financial Administration Act.
- Treasury Board Secretariat's Contracting Policy and the Interpretations; and
- Policies and Guidelines developed by Employment and Social Development Canada.

Additionally, CSC has provided Elder Orientation Training, distributed guidelines and memos regarding Elder services including a memo on the Security Clearance Process for Elder Services, Contracting Guidelines for Elders within the Correctional Service of Canada, and Information Guide for Contractors.

CSC Policy Framework

CSC does not have a specific policy devoted to Elder Services. However CD 702, GL 702-1, and GL 726-1 help to set expectations for Elders, including their involvement in programming and Pathways Initiatives. Individual requirements regarding Elder Services are also spread across the following CDs:

- CD 566-9: Searching of Cells/Rooms, Vehicles, and Other Areas;
- CD 578: Intensive Intervention Strategy in Women Offender Institutions;
- CD 700: Correctional Interventions;
- CD 705-5: Supplementary Assessments;
- CD 710-3: Temporary Absences;
- CD 711: Structured Intervention Units;
- CD 712-3: Parole Board of Canada Reviews; and
- CD 726: Correctional Programs.

Annex D: Areas Elders Provide Services

According to their contracts, Elders are to provide services in 12 areas, including ceremonial and spiritual services, advice and guidance, as well as in case management.

The Elder must provide (in-group or individual) counseling, teachings and ceremonial services to Indigenous offenders. This includes the following:

- Providing guidance and teachings through group sessions (circles) and individual discussions to offenders in the institution.
- Conducting spiritual services and various traditional ceremonies based on Elder's teachings
- Assisting offenders following a healing path in support of their correctional plan
- Elders may be requested, by agreement, to escort offenders on Escorted Temporary Absences for ceremonial and other spiritual purposes

With regard to advice and guidance, the Elder must, upon request:

- Provide advice/information to staff and management, locally, regionally and nationally on issues of Indigenous spirituality and cultural practices
- Introduce institutional staff to various elements of traditional spirituality as deemed appropriate based on their teachings
- Provide advice to the Institutional Head regarding ceremonies, ceremonial objects, traditional practices and protocols, traditional medicines, or sacred ground within the institution including the collection and storage of ceremonial objects and traditional and ceremonial medicines

In terms of case management, the Elder must:

- Participate in case conferences as requested
- Provide verbally to the Case Management Team, as requested, information regarding the offender's participation in a healing path as part of the offender's progress report
- Upon receiving a referral/request from Case Management team, the Elder must provide initial information and updates verbally or in writing to the Indigenous Liaison Officer or Parole Officer for documentation which may include initial observations

The Elder may be asked to provide advice, guidance, information, or recommendations regionally or nationally on issues of Indigenous spirituality and cultural practices. If applicable, this may also include participation, by agreement, on regional or national advisory bodies, such as the National Elders Working Group, or the National Indigenous Advisory Committee

Annex E: CSC's National Committees related to Elders

Committee	Mandate	Chaired by	Membership	Frequency of Meetings
Sub- Committee on Indigenous Corrections	The Sub-committee on Indigenous Corrections will provide strategic analysis, horizontal advice, and recommendations to EXCOM on issues relating to effective, culturally appropriate interventions and reintegration support for First Nations, Métis and Inuit offenders. The Sub-committee will guide and monitor the strategic direction for Indigenous Corrections, and will ensure EXCOM is informed and engaged on Indigenous priorities and issues, as well as national and regional performance results.	Senior Deputy Commissioner	 Key Senior Managers: Regional Deputy Commissioner – Prairie Region Assistant Commissioner Correctional Operations and Programs Assistant Commissioner Policy Deputy Commissioner for Women Director General, Indigenous Initiatives Directorate 	Monthly
National Indigenous Advisory Committee	To further reconciliation between Indigenous peoples and the Correctional Service of Canada, the Committee will provide a forum for providing advice and recommendations to the Commissioner on the provision of correctional services to Indigenous offenders.	Commissioner	The Committee shall consist of Indigenous community leaders, selected by the Commissioner, who combined, provide a balanced community perspective on Indigenous corrections.	Minimum two meetings per year
National Elder Working Group	To provide recommendations on policy, procedures and interventions impacting Indigenous offenders. Providing subject-matter expertise within CSC to address cross-sector and operational implementation issues for spiritual matters that impact Indigenous offenders, the NEWG works to foster positive working relationships and ensure a supportive environment is in place for the healthy exchange of advice and guidance on all aspects of Indigenous corrections.	Director General, Indigenous Initiatives Directorate	Seven Indigenous Elders, each of whom is an expert in Indigenous culture	One to four times per year

Annex F: Statement of Conformance

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

Christian D'Auray, CPA, CA
Chief Audit and Evaluation Executive