

Equity, Diversity, and Inclusion Audit

Recommendations and Management Responses

December 7, 2023

Office of the Auditor General

Lyn Guo, Senior Audit and Investigations Specialist Nancy Hu, Senior Audit and Investigations Specialist Brigitte Minard, Deputy Auditor General Charles Brown, Auditor General

Introduction

The following 33 recommendations will help improve the governance and management of Equity, Diversity, and Inclusion (EDI) implementation in the City in all three areas reviewed. They will help ensure the successful embedding of EDI as part of the ingrained culture in everything the City does.

Recommendation 1

We recommend a governance structure that helps ensure proper oversight and accountability for EDI initiatives be created. This could be set up within the current organizational structure using a conventional Steering Committee or by creating a standalone Diversity Office (Appendix A, para. 155-157).

Management Response

Agree.

This Recommendation will be subject to review and concurrence by Senior Leadership Team and Council approval as it will require additional resources in terms of people and financial support. It should be noted that the recommendation of a standalone Diversity Office was presented to Council in 2019 for consideration. It was noted in HUR19019 that the standalone option would:

- 1) Clearly communicate the priority this work has within the organization
- 2) Allow for dedicated resources and focus on Diversity and Inclusion work
- 3) Increase the effectiveness and timeliness of the deliverables

At that time, Council was not supportive of additional structure for this work and directed the work to remain with the Human Resources division.

Estimated Completion Date: Unknown at this time.

Recommendation 2

We recommend management consider having the Steering Committee include at least one representative from all Departments including the City Manager's office and CityHousing Hamilton, and key corporate functions.

Members should be made up of the Corporate Leadership Team (CLT) comprised of Directors and above. This level is between middle-managers and Senior Leadership and has a broader range of influence across their Departments and Divisions. The Committee should also prioritize the inclusion of

members with public engagement expertise. This would also help address the fractured and siloed approaches to EDI within the City (Appendix A, para. 155-157).

Management Response

Agree.

This Recommendation will be subject to review and concurrence by Senior Leadership Team as it will require additional resources in terms of people and financial support. This Recommendation changes the intent of the original Steering Committee which was to provide future leaders an opportunity to learn and develop competencies and capacity in relation to EDI/IDEA. The original committee approved by Council was never intended to form a governance structure when created. The recommended commitment of time and resources to have CLT and above participation may prove challenging to resource adequately given competing priorities.

Estimated Completion Date: Unknown.

Recommendation 3

We recommend, to support the Steering Committee, each Department and/or Division consider creating their own EDI advisory committees. These could include the current members of the HR EDI Steering Committee. The oversight of the advisory committees would be within the Departments and Divisions and could be formed according to each Department and Division's unique needs.

HR could be the knowledge lead (set the standard for resources, policies, language, training, etc.) but the implementation would be done by each Department in conjunction with the input of the Divisions (Appendix A, para. 49-50, para. 67-78).

Management Response

Agree.

This Recommendation will be subject to review and concurrence by Senior Leadership Team as it will require additional resources in terms of people and financial support. This Recommendation would greatly expand involvement in terms of number of skilled resources required to staff the number of committees as outlined above.

Estimated Completion Date: Unknown.

We generally recommend a risk assessment be performed prior to the launch of a major long-range project like EDI implementation. This should also be done as a part of setting up the governance structure (consider people, process, and technology). Aside from operational and compliance risks, reputational risks and related legal risks should be considered as well (Appendix A, para. 50).

Management Response

Agree.

This Recommendation will be subject to available financial resources to conduct an EDI/IDEA risk assessment as those skills are not currently available in-house. This would require Council approval for additional funding as outlined in a Recommendation Report to be presented at a later date.

Estimated Completion Date: 12 – 18 months subject to Council approval of funds.

Recommendation 5

We recommend that EDI implementation in all areas be executed and managed as a large-scale multi-year project, that is led by a project management team who should be accountable to the governance structure discussed in Recommendation 1 (Appendix A, para. 50, para. 60-63).

Management Response

Agree.

This Recommendation will be subject to review and concurrence by Senior Leadership Team and Council as it will require significant additional resources in terms of people and financial support. This would require Council approval for additional funding as outlined in a Recommendation Report to be presented at a later date.

Estimated Completion Date: Q4 2025.

With the frequent use of consultants in the EDI implementation work, we recommend management have more scrutiny of the quality of the work and/or deliverables of the consultants they engage to ensure maximum value for money is achieved. This includes if the recommendations are specific enough (to the City of Hamilton vs. any municipality) and feasible to operationalize and if it will make a long-lasting impact and/or meaningful change (Appendix A, para. 59, 121, 158).

Management Response

Agree.

In the initial stages of EDI work, the scope and recommendations were often broad by design and, at times, as requested by Council. As we continue to gain clarity and increased focus on specific operational items, i.e., Training, we are better able to refine expected outcomes accordingly in RFP documents. From an HR perspective, the one challenge noted in the Audit was in relation to EY survey completion rates. We elected to conduct the survey in 2021, despite the global pandemic, rather than delay the work for an unknown period. As such, we recognized the ability to reach all employees would be hampered by limited access to employees without email. This has been addressed in partnership with IT who have provided all employees with email addresses since that time.

Completion Date: Completed Q1 2024.

Recommendation 7

Where consultants have recommendations that impact multiple areas, the City should ensure a collaborative approach with areas impacted to address recommendations from consultants. Such a collaborative approach should be initiated by the leading area who retained the consultant and brings all areas impacted on board to take actions. The value for money spent on retaining a consultant is only achieved when consultant's recommendations are acted upon (Appendix A, para. 120-122).

Management Response

Agree.

The consultants' recommendations were informed through extensive community consultation efforts with equity-deserving groups, people with lived experience of hate and discrimination as well as residents and other impacted parties. A collaborative approach was used to execute the consultants' recommendations.

A Hate Prevention, Mitigation and Community Initiatives Action Plan was developed to coordinate both cross-departmental and community-driven efforts to address and action eighteen Council-approved recommendations as outlined in the consultants' final report.

There are many collaborative corporate-wide initiatives that have actioned and continue to further advance these recommendations including the following: City Enrichment Fund; select Citizen Advisory Committees (i.e., Committee Against Racism; LGBTQ Advisory Committee); Community Safety and Well-being Plan; Economic Development Action Plan; Hamilton Immigration Partnership Council; Hamilton Police Services (Hate Crime Review Team); Housing and Homelessness Action Plan; One-Time CEF Grant Relief Program; Placemaking Grant Program; Public Engagement Policy and Administrative Framework; Urban Indigenous Strategy; and Youth Engagement Strategy.

Outcomes of collaborative cross-departmental efforts that have addressed the consultants' recommendations include:

- Amended Sign By-Law 10-197 banning hate flags and symbols from public property
- Hamilton4All Community Inclusion campaign
- Salam Hamilton Anti-Islamophobia campaign
- Transit "Speak Up, Speak Out" campaign
- Municipal Anti-Hate Symposium
- We Are Hamilton: Black History Remembered campaign
- No Hate in the Hammer Coalition
- Hamilton Police Services Hate Crime Review Team
- Hamilton Police Services Hate Crime Symposium
- Anti-Hate Tool Kit
- Building Safer Communities Multi-Year Plan
- Community Safety and Wellbeing Plan
- Hamilton Anti-Racism Resource Centre
- We Support Hamilton Community Online Hate Reporting Tool
- City-Approved Days and Months of Recognition

Note: Hate is an ongoing issue in our city. While the key deliverables outlined within the Hate Prevention, Mitigation, and Community Initiatives Action Plan have been completed, ongoing cross-departmental collaborative initiatives will continue to support this work.

Completion Date: Completed Q4 2023.

We recommend that management evaluate if there is still value in paying a consultant to have the cultural assessment and ELA completed each year. It was not done in 2022. Senior Leadership asked that the ELA not be done due to other priorities.

These activities are in addition to the City's Our People Survey (OPS) Survey every three years. They were intended to be used to collect metrics. The OPS survey is essentially a cultural assessment of the City. It could be done more frequently than 3 years and in lieu of the Cultural Assessment (Appendix A, para. 52-55).

Management Response

Agree.

The Cultural Assessment was undertaken in 2021 as the regularly scheduled OPS survey was delayed due to the pandemic. These questions will be implemented in the next OPS survey scheduled for 2024. With respect to the ELA, it was determined not to repeat the following year due to the significant changes in Senior Leadership Team composition (GM Healthy and Safe Communities and GM Public Works) as well as competing priorities during the pandemic and Emergency Response.

Completion Date: Completed November 2023.

Recommendation 9

We recommend that management should consider incorporating some of the KBI/KPI's (Key Behavioural Indicators/Key Performance Indicators) in EY's recommendations of what to measure such as, "Employee perception of leadership accountability as it relates to EDI," "Employee perception of leadership transparency as it relates to EDI," "Feedback provider perception of leadership commitment to EDI," into the City's internal staff survey, the Our People (OPS) survey (Appendix A, para. 97).

Management Response

Agree.

These questions will be incorporated into the next iteration of the Our People Survey.

Estimated Completion Date: Q4 2024.

We recommend criteria for the Department EDI Advisory Committees described above, that prioritize staff with lived experiences and/or staff already doing EDI work for their Departments or Divisions. Consideration should be made regarding the skills of the individual as to how they could contribute to project implementation (e.g. an experienced project manager or data analyst with lived experiences would be ideal) (Appendix A, para. 76-79).

Management Response

Agree.

This is subject to Recommendation #3 above and would require Senior Leadership Team review and concurrence. It is agreed that staff already doing work in EDI and those with lived experiences bring significant value to the Advisory Committee, it is also important to create opportunities to develop capacity and competencies in those identified on Succession Planning Slates to ensure future leaders are confident in the EDI/IDEA realm.

Estimated Completion Date: Unknown.

Recommendation 11

We recommend that management, in addition to designating the City Manager or SLT to be champions of EDI, they should regularly highlight the work of those staff already doing EDI work in the City (Appendix A, para. 112-114).

Management Response

Agree.

We have developed an IDEA poster which includes an option for employees to submit success stories to the Diversity team for inclusion in an upcoming newsletter or City Manager and General Manager communications. We recently held a recognition event for the inaugural EDI Steering Committee upon completion of their three-year term. We are also highlighting EDI efforts on Closed Circuit television where available. The goal of regular communication highlights will be incorporated into the 2024 PADs for Senior Leadership Team.

Expected Completion Date: Q1 2024.

We recommend management explore alternatives to the existing PeopleSoft system for data collection to allow for more robust data collection, and consideration be given to acquiring the competencies of a data analyst for EDI. This should be in conjunction with other HR areas which may also benefit from enhanced data collection and storage (Appendix A, para. 85-86).

Management Response

Agree.

Fully support the Recommendation that enhanced capabilities are required for data collection, compilation, and analysis. The need for a new HRIS has been established and work is underway with Deloitte to source best option. It is important to note that this will require a significant undertaking of both people and financial resources to bring to fruition and is a massive project due to scope. This will require financial support from Council over a period of several years.

Estimated Completion Date: Q4 2028.

Recommendation 13

We recommend HR EDI consider the collection of legally and culturally accepted demographic data, including gender identity/expression data, and Commonly Tracked Metrics provided by EY as part of the OPS survey (Appendix A, para. 95).

Management Response

Agree.

We can include the additional questions on demographics as outlined in the Recommendation, however, there are limitations on use given that the OPS survey responses are anonymous and not tied to individual employees by design and to encourage a high response rate.

Expected Completion Date: Q4 2024.

We recommend for Departments where Employment Equity Data has already met or exceeded the 80% response and return rate, that management consider reviewing the data (including exit/termination demographic data) in collaboration with HR to establish objectives and/or goals related to diverse and inclusive recruitment, retention, and promotion in alignment with departmental strategic plans and initiatives. Once established, management should consider discussing targeted recruiting, retention, and promotional (succession) plans with HR to meet these goals (Appendix A, para. 94).

Management Response

Agree.

The ability to do comprehensive data analysis is an ongoing challenge with our current system limitations. This detailed analysis and targeted goal setting will take place once a new HRIS system is implemented.

Estimated Completion Date: Q4 2028.

Recommendation 15

We recommend an immediate priority be placed on providing clear directions, expectations, and objectives regarding the use of the IDEA Framework to internal departments, divisions, services, and programs areas with regarding the use of the Framework (Appendix A, para. 155).

Management Response

Agree.

We are in the process of hosting information sessions at all Departmental Management Team meetings to engage managers and above on the use of the IDEA Framework. Additionally, a resource document has been developed for implementation on how to revise policies to embed IDEA. This has been shared with the HR Policy Review Group for feedback and will be disseminated to all policy makers across the organization. Each department will then undertake the application of the Framework on their respective scope of work.

Expected Completion Date: Q2 2024.

We recommend annual reporting on EDI implementation efforts should include what tangible and significant progress was made towards goals and initiatives (Appendix A, para. 168).

Management Response

Agree.

We have been providing annual updates to both Senior Leadership Team and Council on an annual basis since the introduction of the Diversity and Inclusion Strategic Plan in 2017. The most recent update was provided on November 15, 2023, at GIC.

Completion Date: Completed November 2023.

Recommendation 17

We recommend management consider relaunching the IDEA page in HOWI (or any successor technology) at later date, once it is fully developed as a resource, and notify staff of its launch at that time (Appendix A, para. 100-101).

Management Response

Agree.

The HOWI landing page was launched in July 2023 and is an ongoing effort to further develop resources and tools for staff. A broader Communications plan will require support from Corporate Communications team.

Estimated Completion Date: Q4 2024.

Recommendation 18

We recommend the IDEA page include a definition of Equity, Diversity, Inclusion, and Accessibility on the IDEA landing page in HOWI, as the definitions, as well as information such as the alternative terminology for "lens," should be known to all staff (Appendix A, para. 100-101, 115).

Management Response

Agree.

The definitions have been added to HOWI as of November 2023.

Completion Date: Completed November 2023.

Recommendation 19

We recommend management consider more inclusive recruiting practices. Positions, including those at the SLT level, should be posted on websites that target equity seeking groups (Appendix A, para. 108-109).

Management Response

Agree.

We continue to post on a wide variety of sites, however, those efforts can be expanded at additional cost. SLT positions are recruiting using an Executive Search firm who has experience in attracting diverse candidate pool. There are numerous sites these positions are posted to ensure a robust and diverse candidate pool.

Expected Completion Date: Q1 2024.

Recommendation 20

Consider having a recruitment budget to enable posting of City of Hamilton jobs on sites that may have a more diverse reach but require a fee (Appendix A, para. 110).

Management Response

Agree.

This would be subject to Council approval for enhanced recruitment budget through the budget process.

Expected Completion Date: Q2 2024.

We recommend management track how many of the applicants that come to the City of Hamilton are from diversity-specific job posting websites versus non-diversity specific sites (Appendix A, para. 108-110).

Management Response

Agree.

This Recommendation is subject to the acquisition of a new Talent Management System as part of the overall HRIS. Our current system has limited opportunity to capture this data without placing additional requirements on candidates to complete lengthy questionnaires. This has not been pursued due to the adverse impact on the candidate experience at this time.

Estimated Completion Date: Q4 2028.

Recommendation 22

We recommend that, for the four demographic groups from the EES that are challenging for the City to improve, management consider identifying key positions (including leadership) that could incorporate criteria such as having people with lived experiences who understand barriers to employment and career progression. This could help facilitate the recruitment of a more diverse staff and help remove barriers (Appendix A, para. 102-107).

Management Response

Agree.

This recommendation was made to SLT in February 2023 as part of an enhanced Succession Planning program which would identify key development roles throughout the organization. SLT deferred this recommendation until the Organizational Review work, as recommended by consultant Optimus SBR and approved by Council in Q1 2023, is completed in 2024.

Estimated Completion Date: Q4 2024.

We recommend management consider a more inclusive recruitment/retention approach.

Consider for entry-level and junior roles, candidates who may have skills and life experiences or perspectives that may contribute to EDI. The City can invest in a less experienced person for an EDI role through training. This may also help with retention (Appendix A, para. 102-110).

Management Response

Agree.

We are currently working with various agencies such as the Hamilton Disability Employment Network and CNIB to source candidates with relevant and transferable skills for entry level jobs, such as Crossing Guards. These agencies evaluate the skills, education, and experiences of job seekers and match them to our available job postings which we provide on a weekly basis.

Completion Date: Completed September 2023.

Recommendation 24

We recommend management review work related to the community strategy in both Children and Community Services Division and Office of Government and Community Relations to identify work that can be shared, simplified and combined. Streamlining similar work not only reduces duplicated efforts but also harnesses potential synergies (Appendix A, para. 123).

Management Response

Agree.

The Government and Community Relations Division has been actively engaged with the Children & Community Services Division regarding existing work and common objectives that are shared which can be simplified and combined. Both teams are deeply committed to working together to deliver on a variety of objectives for the benefit of community in Hamilton. Since Fall 2022, Staff in both divisions initiated consistent meetings to ensure duplication was avoided and to work collaboratively to identify relevant leads and potential synergies for these ongoing and communal shared initiatives.

Between the Government and Community Relations team and Children & Community Services Division an initial environmental scan occurred, where

positions within each team were evaluated based on existing job descriptions and titles to ensure relevant work was tasked to the current team member within the appropriate division.

As a result, specific actions were taken to address this such as the shifting of responsibilities for the staff liaison role and support of the LGBTQ+ Advisory Committee from Government & Community Relations to Children & Community Services Division in early 2022.

Due to similar equity deserving groups in community being supported by both divisions, this work will continue to be on-going with a collaborative approach being taken in an effort to avoid duplication. Where there is duplication, each team will seek to achieve any mitigation measures to streamline tasks and maintain efficiency.

Estimated Completion Date: Q1/Q2 2024.

Recommendation 25

We recommend that clear objectives be defined for EDI work with citizen advisory committees and community partners, and a further strategy / plan be developed to systematically guide the work with these stakeholders. The strategy should consider all equity seeking groups and what they are interested in to avoid a siloed approach (Appendix A, para. 117).

Management Response

Agree.

A recent motion from Council, brought forward at Audit, Finance and Administration on July 13, 2023, referenced the City Manager's Office and Corporate Services being directed to report back to the Audit, Finance and Administration Committee with recommendations on the following:

- (i) best practices that prioritizes resident engagement including access to, understanding of and participation in community engagement;
- (ii) review and provide recommendations to Council as informed by existing partnerships with local community-based organizations and networks to help shape and advise decision-making efforts on City initiatives, programs, services, policies, and by-laws;
- (iii) existing community-based engagement methods inclusive of the Volunteer Advisory Committees to fulfil the priorities of Council aligned with the Term of Council priorities 2022 2026; and

(iv) a resource list of local equity-deserving groups doing community and grassroots organizing that can be contacted for engagement and feedback on City Wide processes and policies.

In September 2023, through the City Manager, the Office of the Government & Community Relations reported back on this initiative with an intention to work with the Corporate Services division to undergo a comprehensive review of Citizen Advisory Committees. The following was deemed to be "in scope":

- Conduct a best practice scan of municipal Voluntary Advisory Committees and related alternatives, including a comparative analysis across other jurisdictions
- Consultation with Council members, advisory committee members, and staff liaisons to better understand current challenges and needs
- A review of financial and human resources required in the current advisory committee structure
- Assess current state of meetings including attendance, meeting frequency, turnover, etc.
- Scan of other advisory tables that the City actively consults with for advice and feedback, including community-based task forces, steering committees, and working groups
- Review external community-based organizations, and their methodology, that support similar work provided by Voluntary Advisory Committees
- Consider the role of advisory committees within the forthcoming Public Engagement Framework and Policy

As a result, Staff will be reporting back to Council at the end of Q1/early Q2 with clear objectives for citizen advisory committees and community partners, inclusive of future recommendations as to how best to engage with residents and equity deserving groups. The strategy will consider the lived experience of equity deserving residents, previous members of volunteer advisory committees, local community groups and what they are interested in to avoid a siloed or duplicative approach.

Expected Completion Date: Q2 2024.

We recommend Department management consider collecting an inventory (listing and responsible staff) to understand the work already going on in their respective areas and to understand if there may be synergies to be had. This can be shared with other areas in other Departments through a steering committee or other governance structure as previously recommended (Appendix A, para. 156).

Management Response

Agree.

This Recommendation would be subject to Senior Leadership Team review and approval and available resources.

Estimated Completion Date: Q4 2025.

Recommendation 27

We recommend that as the City moves to revamp the budgeting process, that the updated budget process consider EDI principles as part of the budget ranking and prioritization criteria, and that performance outcomes specific to EDI be measured in corporate performance measurement (Appendix A, para. 51).

Management Response

Agree.

This Recommendation would be subject to Senior Leadership Team and Council review and approval. For 2024, as outlined in CM23020, one of this Council term's Measure of Success is:

Transition to a revised budget process that emphasizes long-term financial planning, asset management, public engagement and climate principles.

The Government Finance Officers released a research report in July 2023 which highlights the importance of "Budgeting for Equity". This recommendation will be referred to Corporate Services.

Estimated Completion Date: Unknown.

We recommend management consider conducting regular internal and external environmental scans related to IDEA implementation. The results of these scans could be reported to Council every two years (Appendix A, para. 164-167).

Management Response

Agree.

This Recommendation is subject to Senior Leadership Team review and approval. There would be financial resources required to perform these environmental scans on an ongoing basis.

Estimated Completion Date: Q4 2026.

Recommendation 29

We recommend that management consider incorporating EDI costs into budget processes in an identifiable manner so that these investments are known and tracked by the organization. This may include cost for training of staff, cost for EDI related facilities such as universal washrooms in the park, prayer/worship room within City Hall, cost for upgrading IT systems to enable data collection as discussed in Recommendation 13, etc. During future budgeting processes revamp, equity-based budgeting as a budgeting methodology could also be considered (Appendix A, para. 52-55, 86, 170).

Management Response

Agree.

Similar to Recommendation #27 above, this Recommendation would be subject to Senior Leadership Team and Council review and approval. There may also be a needs assessment to determine if current systems are capable of details required. Refer to Corporate Services for follow up.

Estimated Completion Date: Unknown.

Recommendation 30

We recommend that management put in place a robust, long-range strategic project plan for EDI implementation throughout the entire organization that covers all aspects of EDI (as an employer, for community engagement and for service delivery). This means there should be a plan for what the short-term EDI objectives are and what the long-term EDI objectives are, how these objectives

can be achieved. Furthermore, there should metrics to demonstrate what success looks like at each phase (Appendix A, para. 40, 57, 60-63, 168).

Management Response

Agree.

This Recommendation would require Senior Leadership Team review and approval and/or Council direction and resource support.

Estimated Completion Date: Unknown.

Recommendation 31

It is our understanding that the EDI Framework is also the guideline for incorporating EDI principles into the delivery of City services. We recommend such expectations of implementing EDI Framework in service delivery be clearly communicated to each service and program area. Individual services and program areas should develop their own plan to apply EDI in their business processes while applying the concepts and principles in the Framework (Appendix A, para. 156).

Management Response

Agree.

This Recommendation is subject to Senior Leadership Team's review and approval as well as allocation of resources (people and financial) to achieve if approved.

Estimated Completion Date: Unknown.

Recommendation 32

We recommend a corporate direction that brings more focus to external service delivery, and that support be provided to better enable service delivery areas in developing their own EDI framework such as Housing Services or in embedding EDI in the business processes to deliver services such as Transit. Such support should ensure the message to internal staff, and to the community is consistent and in line with the corporate EDI Framework (Appendix A, para. 154-155).

Management Response

Agree.

This Recommendation is subject to Senior Leadership Team's review and approval as well as approval of additional resources to complete.

Estimated Completion Date: Unknown.

Recommendation 33

We recommend that in consideration of the recommendations herein, that a needs assessment be completed to determine what resources are required for their successful implementation. It should include an assessment of what resources are available and what resources are needed to achieve the City's objectives for each phase (Appendix A, para. 169-170).

Management Response

Agree.

Similar to Recommendation #30, this would be subject to Senior Leadership Team review and approval and/or Council direction and resources to conduct both the project plan and needs assessment.

Estimated Completion Date: Unknown.

Overall Management Response:

In reviewing the EDI Audit Report, it is important to note that, while all Recommendations are agreed to, the gap between the current state of the organization versus the desired future state as outlined in the Audit Recommendations is quite significant.

Recommendation Report HUR19019 as of September 2019 highlighted that based on the data collected and environmental scan performed, the City of Hamilton was at a Level 2 overall on the following Diversity and Inclusion Maturity Matrix.

In 2021, EY's assessment concurred that the City of Hamilton at the upper edge of Level 2 as indicated in Figure 7 on page 37 in the Audit Report. It should be noted that the pandemic resulted in staff redeployments which also impacted delivery of EDI efforts during the period between evaluations.

The Audit Recommendations are reflective of an organization at a Level 5. This transition from Level 2 to Level 5 is a massive shift that would typically take place over a period of many years. While we fully support the Recommendations made, our concern is that they are not achievable in a short period of time, but rather can only be achieved with extensive people and financial resources over a prolonged timeframe.

Our focus has always been on meeting the organization where it is and making year over year improvements, which have been fully supported by Senior Leadership Team and as directed by Council. The recommended Audit changes are far reaching given our current state, system and data limitations, and resources. To successfully achieve the Recommendations, it will require an enduring commitment and investment by the organization.

As a result, many of the Management Responses indicate a need for Senior Leadership Team and/or Council review and approvals. There will be a need to prioritize the Recommendations to determine what is fiscally feasible and how quickly the organization can allocate the necessary resources to achieve given other critical priorities currently facing the City of Hamilton.

It is suggested a follow up report back to Council as of Q4 2024 be undertaken to confirm the level of commitment and resources available.