INVESTIGATION: EMERGENCY SUPPORT SERVICES

Excerpted from Special Report No. 54 (Pages 11-62)

Fairness in a changing climate: Ensuring disaster supports are accessible, equitable and adaptable

The Emergency Support Services program

Emergency Support Services (ESS) is one of the core provincial programs available to assist people who have been displaced because of an extreme weather event. ESS arises from the Emergency Program Act (EPA), under which local authorities (municipalities and regional districts) are responsible, as part of their emergency management duties, for having a program that coordinates the provision of food, clothing, shelter, transportation and medical services for those affected by emergencies and disasters.58 As the lead coordinating agency for emergency events, the ministry is responsible for providing leadership, policy direction and financial support for local authorities and First Nations for emergency response, as well as supporting emergency response and public safety volunteer groups, including Search and Rescue and ESS.59

Because the EPA does not apply on reserve lands, First Nations governments (except for the Modern Treaty Nations) are not mandated to adopt ESS or a similar program. 60 However, the Ministry of Emergency Management and Climate Readiness is responsible for "leading the management of provincial-level emergencies and disasters and supporting other authorities within their areas of jurisdiction."61 This includes providing support for First Nations, as formalized in 2017 through a 10year bilateral emergency services agreement between Indigenous Services Canada and the ministry, intended to ensure that First Nations communities on reserves receive emergency management support comparable to what is provided to other local authorities.62 Under this agreement, First Nations in BC may elect to provide ESS to their residents, following the same process as local authorities. 63 Where an evacuated person's First Nation does not provide ESS, that person can still access ESS through a local authority.⁶⁴ In addition, First Nations that have concluded a modern treaty with the province can exercise the powers of local authorities under the EPA.65

ESS is designed to provide short-term financial support, for a maximum of 72 hours, with the goal of helping people begin to reestablish as quickly as possible after a disaster event by providing for their basic

needs.⁶⁶ Circumstances in which the program may assist range from a single house fire that displaces a family to calamities involving mass evacuations.

ESS is intended as a temporary measure to be used until evacuees can return to their homes or are no longer in need because they have accessed support from alternatives like insurance or family.⁶⁷ ESS primarily provides financial assistance for food, lodging, clothing and incidentals, as well as transportation in limited circumstances.⁶⁸

ESS is financed by the ministry through a reimbursement process. First Nations governments and local authorities pay their emergency response costs first and then submit claims to the ministry for reimbursement of eligible expenses.⁶⁹ Evacuees are also provided services through the referral process and in many of these cases, local suppliers bill the province directly. Under a service agreement, Indigenous Services Canada (ISC) reimburses the ministry for 100 percent of all eligible expenditures disbursed by the ministry to First Nations in responding to an emergency event and is responsible for finding options for costs that are ineligible under the ministry's program but that may be reimbursable under the federal **Emergency Management Assistance** Program administered by ISC.⁷⁰ For example, the ministry told us that ISC provided more flexible funding for group and community meals.

ESS is designed to be delivered primarily by trained volunteer responders, and in most communities, direct evacuee support is delivered by local volunteers. These ESS teams are organized as part of First Nations and local authority emergency management programs. Despite the local volunteer-based model, some communities rely on internal staff to carry out core program functions. Others contract the delivery of all or part of their ESS program to third-party

organizations, primarily the Canadian Red Cross. 71 Some local authorities and First Nations have very limited ESS capacity. In an emergency event, these communities may call on a neighboring community to provide mutual aid or they may request provincial resources from the ministry. 72 For the most part, the cost of employing staff or contractors to provide direct, front-line service to evacuees is not eligible for reimbursement by the ministry. Instead, these costs must be borne by individual local authorities and First Nations governments.

ESS responders are encouraged to undergo ESS training delivered by the Justice Institute of British Columbia. Fees for courses are covered by the province for individuals active with their local ESS program. Training is offered in three general categories: introductory training, specialized training for more experienced ESS team members, and ESS management/leadership training. Introductory-level courses cover topics like reception centres, group lodging, registration and referrals.⁷³ The course on registration and referrals teaches volunteers about the categories of support that are available and how to assess the needs of evacuees.⁷⁴

ESS modernization

The ESS program is undergoing a modernization effort, in large part as a response to the April 2018 report Addressing the New Normal: 21st Century Disaster Management in British Columbia, which called for changes to BC's emergency management system. Addressing the New Normal recommended that the province develop an online system for registration of evacuees and for management and reimbursement of expenses incurred through emergency response and recovery.⁷⁵

Prior to 2020, all registrations and referrals were administered using a paper form system. In April 2020, the province launched a digital platform called Evacuee Registration and Assistance (ERA).⁷⁶

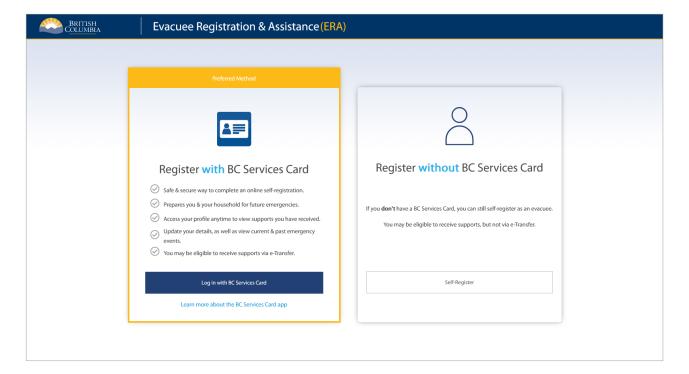
ERA allows for evacuee self-registration, e-transfer payments to evacuees, and online submission of invoices and receipts to EMBC for ESS suppliers.⁷⁷

ERA was released in two phases: 1.0 in the spring of 2020 and 2.0 in the summer of 2022. RRA 1.0 allowed digital registration of evacuees, and ERA 2.0 supported the e-transfer functionality. The ministry indicated that digital registration and e-transfer capability was intended to address delays and long lines at reception centres and to provide choice in where financial supports can be used. For example, the introduction of digital registration may allow for virtual service delivery and reduce the requirement for in-person registration. The e-transfer capability may support evacuees

in accessing more culturally appropriate food. The ministry also indicated that the ERA 2.0 upgrade would speed up payment to suppliers, many of whom had experienced long payment delays during previous emergency events. ⁷⁹ Likewise, e-transfers may support evacuees in accessing necessary goods and services in communities where suppliers are not participating in the ESS referral program.

Local ESS programs may choose to use the ERA tool or may choose to continue to use paper forms, or a combination of both. Using the ERA tool requires ESS responders to take training through a self-guided course delivered by the Justice Institute. 80 By August 2022, 87 local authorities and First Nations governments were using the ERA tool.

Figure 1: Screenshot of Evacuee Registration and Assistance online registration page



In 2022, the province released an updated policy guidance document for the ESS program. The previous version dated from 2010.⁸¹ The new guide describes service delivery by First Nations governments and

includes greater emphasis on the need to provide culturally safe support to evacuees. It also includes more detailed information about the responsibilities and considerations for different levels of government during preparedness and response phases, as well as information about the ERA tool.

Accessing ESS in an emergency

When an emergency event occurs, affected First Nations governments and local authorities activate their ESS plan and form an appropriate structure to deliver the program. Procedures vary based on the severity of the disaster and number of

individuals affected. For smaller events, ESS may be limited to a roadside response. Larger events may require the opening of one or more reception centres within or close to the community as well as an emergency operations centre (to support and coordinate between the reception centres). ESS is activated at different levels, depending on the size of the event and the type of ESS resources required.

Figure 2: Levels of ESS activation83

LEVEL I	Localized events requiring minimal emergency resources (for example, structure fires)
LEVEL 2	Significant events requiring full use of a local authority's or First Nation government's emergency resources
LEVEL 3	Major emergencies requiring assistance from neighbouring jurisdictions or the province

Local authorities are responsible for advising evacuees on how to register for the ESS program, and the registration process can be different in different communities, depending on the delivery model. 84 Some communities still rely on the paper system, while others have transitioned to the online ERA tool. Either option requires a trained ESS responder to connect with an evacuee in person to complete a needs assessment and provide emergency supports based on that needs assessment. 85

People evacuated in the context of largescale emergencies are generally advised through various means of communication (including evacuation orders) to go to a reception centre to register for and receive ESS. The reception centre is where most ESS responders operate and is the primary location for delivery of ESS. It is intended to be a safe gathering place for people displaced from their homes because of an emergency or disaster. At a reception centre, evacuees are met by ESS responders and can be registered, have their eligibility and needs assessed, and be provided with assistance.

Once evacuees arrive at an ESS reception centre, ESS responders assist them in completing initial registration (either through a paper-based application or the ERA tool, which may have been completed in advance by the evacuee) and then conduct a needs assessment to determine what assistance evacuees require to sustain themselves through the immediate response period.

Based on the needs assessment conducted by ESS responders, evacuees receive financial support for immediate needs such as food, clothing, lodging and incidentals.

There are defined rates for the assistance: Table 1 shows the 2021 rates. The province increased the rates in 2022.86

Table 1: 2021 ESS rates87



EMERGENCY SUPPORT SERVICES (ESS) RATES NOT REDEEMABLE FOR CASH

NOTE TO Services to meet immediate needs should be provided in the most cost-effective manner. Rates below SUPPLIER: are maximum amounts - no additional surcharges are allowable. Extra costs incurred by the evacuee beyond the approved items listed below are the responsibility of the evacuee. See "NOTE TO SUPPLIER" on Referral form for reimbursement process, and "Information for Suppliers and ESS Responders" on the back of the Referral form for more detailed information.

NOTE TO

A current ESS Rates sheet must accompany each Referral Form. The Emergency Management BC ESS WORKER: (EMBC) Emergency Coordination Centre must be consulted when extraordinary requirements are needed

to provide for immediate needs 1-800-663-3456.

ITEMS OF ASSISTANCE	
FOOD Restaurant MealsOR Groceries LODGING Hotel/Motel/B&B/RV Campground	Breakfast Lunch Dinner TOTAL Rate per person \$12.25 \$14.25 \$24.50 \$51.00 (inc. GST) Half the restaurant meal rate applies should the evacuee choose groceries. Daily rate per person \$22.50 (inc. GST/PST) Gratuities, tobacco products and alcohol are not included. Emergency Social Services is eligible for approved Provincial Government Rates from commercial accommodations supplier listed in the Ministry of Labour and Citizens' Services Business Travel Accommodation Listings for government travel.
OR Billeting in Private Homes	Only the cost of the room is covered. The evacuee is responsible for all other charges (e.g. video rentals, damages, parking, local and long distance calls). The Referral Form for billeting is issued to the billeting host (supplier). Billeting rate does not include meals. Billeting Rate: \$30 per night based on single person occupancy. Add \$10 for each additional adult and youth and \$5 for each additional child
CLOTHING (to be issued when evacuees have not been able to pack necessities)	Adults, youth and children * up to \$150.00 maximum per person (inc. pst) Clothing is provided as needed to preserve health and modesty. This <u>is not wardrobe</u> replacement. Clothing may include footwear or special needs items such as baby diapers. * Where extreme winter conditions apply at the time of the incident, and on a needs basis, amount may be increased to \$200 per person.
INCIDENTALS (to be issued when evacuees have not been able to pack necessities)	Transportation necessary to meet immediate needs (e.g. taxis, 3 day bus pass, gasoline) Adults, youth and children up to \$50.00 maximum per person (inc. pst) May include miscellaneous items such as personal hygiene products, laundry supplies, pet food and lodging, medications for a 3 day period, and other immediate needs as required. For extraordinary needs, see "NOTE TO ESS WORKER" above.

Support is provided for a maximum of 72 hours immediately following an evacuation, unless otherwise authorized.

EMBC2395R (08/43)-(08/19) 7530906079 (50/PD)

Rates Effective August 1, 2019

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When the 2021 wildfires and floods occurred, referral vouchers were primarily used to distribute ESS. Vouchers must be used at a specific vendor and must be spent all at the same time. In 2022, the province launched the direct payment option, allowing evacuees with a BC Services Card and bank account to receive financial support by way of an e-transfer.

ESS may be provided for an initial 72 hours or for the duration of an evacuation order. An evacuee may receive less than the standard 72 hours of assistance if they can access their insurance or if the emergency does not require that length of support. Additionally, if there is evidence of an unmet need, extensions beyond 72 hours may be granted on a case-by-case basis. The ESS Program Guide recommends limiting the maximum term of ESS to three months and requires significant justification after a one-month extension. The ESS Program Guide recognizes that supports may be required longer than three months for larger events where homes and whole communities have been destroyed. The ESS Program Guide suggests that response and recovery from these types of events may include partnership with non-governmental organizations (NGOs).

The provision of emergency supports in response to 2021 wildfires and atmospheric river

Flood and wildfire events typically become eligible for ESS when an evacuation order is in effect

People who voluntarily leave their home, without an evacuation order, are not eligible for ESS unless a local authority or First Nations government authorizes them as an "extraordinary evacuee." According to ESS policy, extraordinary evacuees are vulnerable residents who are best supported by being evacuated before an official alert or order is issued.⁸⁸

Many evacuation orders were issued as a result of wildfires and floods across the province from June to December 2021 (see Appendices B and C). Those evacuation orders resulted in tens of thousands of people who were eligible for ESS.

In the following sections, we describe our investigative findings in relation to how people accessed emergency supports after they were forced to leave their homes because of wildfires or the atmospheric river, and for some people, in response to both events.

Where did people receive emergency supports?

ESS was activated across the province in response to evacuation orders and was delivered through local reception centres. In response to the wildfires, at least 20 reception centres were opened, including in Kamloops, Salmon Arm, Chilliwack, Merritt, Kelowna, Vernon, Whistler, Penticton, Lillooet and Hope. For example, Vernon set up a reception centre to provide ESS services for 41 days, starting on August 1, 2021. During the time it was open, volunteers in Vernon registered and assisted more than 3,000 evacuees from the region.

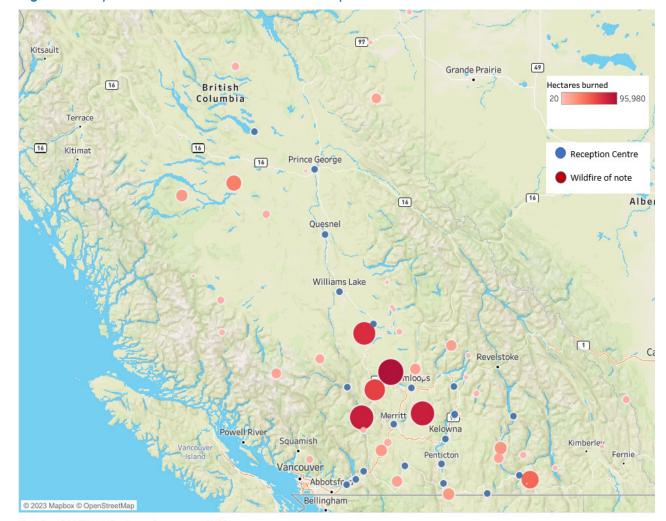


Figure 3: Map of 2021 wildfires of note and reception centre locations

*Data from BC 2021 Wildfire Season Summary and EMBC

In response to the atmospheric river, reception centres were established in Abbotsford, Chilliwack, Duncan, Kamloops, Merritt, Princeton, Kelowna, Halalt First Nation, Quw'utsun (Cowichan Tribes)

First Nation, Hope, Whistler, Pemberton, Mission, Chowéthel (Chawathil) First Nation, Parksville, Nanaimo, Agassiz, Spences Bridge, Salmon Arm, Lillooet, Qualicum and Penticton.

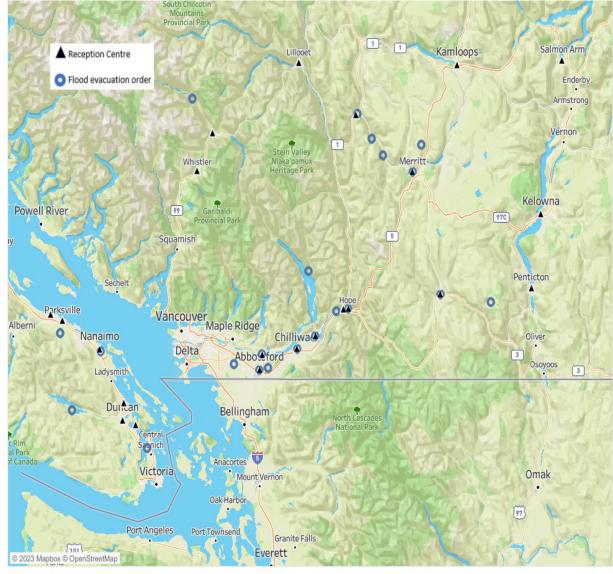


Figure 4: Map of 2021 flood evacuation orders and reception centre locations

* Data from BC Data Catalogue, GeoBCBranch

These locations do not include all of the reception centres set up by local emergency response teams. The ministry was not able to provide us with information regarding the location and operation of all reception centres in the province in 2021 because it does not track this information. The ministry told us that this is, in part, because reception centres may open for a very brief time and may not require coordination with other locations and efforts.

In addition to responding to wildfires and the atmospheric river, ESS was activated throughout the province in response to other events between June and December 2021. including in response to smaller flooding events and structure fires.

Who received emergency supports and for how long?

The ESS program was accessed by tens of thousands of people who were evacuated from their homes because of wildfires, flooding, and landslides in 2021. As a result, the demand for ESS supports in 2021 was much greater than the previous year. This demand is seen in the 6,000 percent year-over-year increase in ESS payments to suppliers.⁸⁹

Table 2: ESS payments to suppliers by fiscal year

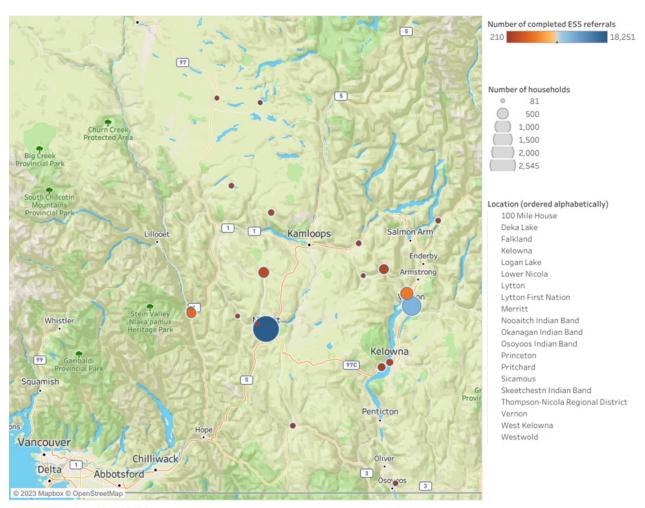
Fiscal year	Total payments to ESS suppliers
2020/21	\$339,351.50
2021/22	\$21,953,507.44

While tens of thousands of people accessed ESS supports between June and December 2021, the exact number of people who accessed ESS supports is unknown because ministry records were limited to tracking supplier payments and households that were registered through the digital ERA platform.⁹⁰

Ministry records did not include registrations, referrals or extensions that were recorded using the paper-based system.

The ERA records provided by the ministry indicate that 63,332 referrals were completed for 9,430 unique households between June 1 and December 30, 2021. While incomplete, these records tell us about where some evacuees were from and for how long they accessed ESS supports. For example, 2,545 households from Merritt received ESS supports in 2021. Figure 5 shows the 20 communities with the most households that received ESS supports from June to December 2021 as recorded by the ERA tool.

Figure 5: 20 communities with the highest number of households receiving ESS supports in 2021

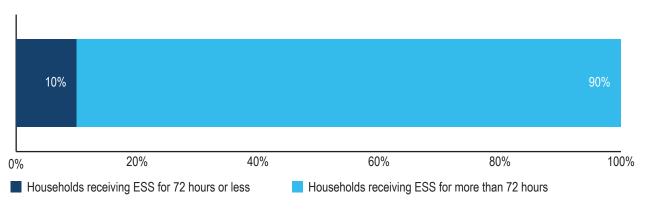


^{*}Based on ERA data provided by EMBC

Our analysis of the ERA data also shows the length of time that some households received ESS supports following the wildfires and flooding in 2021. As shown in Figure 6, 90 percent of the 9,430 households recorded in ERA as receiving ESS during this time received ESS for longer than 72 hours. For

some communities hardest hit by extreme weather, the use of ESS was even greater. For example, 2,475 of the 2,545 households evacuated from Merritt that received ESS, or 97 percent, received ESS for more than 72 hours.

Figure 6: Percentage of households receiving ESS for more than 72 hours from June to December 2021



Note: Data from ERA tool provided by EMBC

Figures 5 and 6 are based solely on ERA records. The ministry does not track registrations, referrals or extensions that were documented using the paper-based system. These paper records are kept by local authorities, First Nations and, in some cases, by third-party providers, such as the Canadian Red Cross (CRC). Although the ministry told us there are processes in place to share information between itself and local authorities, and more recently with CRC, this did not extend to sharing information about the number of paper-based registrations or referrals in 2021. As a result, the ministry could not confirm which reception centres used paper records between June and December 2021.

Analysis: Improving data collection and sharing

The information captured by the ERA tool about the delivery of emergency supports in 2021, while helpful, is incomplete and does not include all of the households that received ESS supports. As noted above, EMBC did not track registrations or referrals documented using the paper system. Moreover, the information we received from EMBC about ESS supports did not include households that may have received services from the Canadian Red Cross, as that information is also held separately.

This approach to record-keeping complicates the province's efforts to accurately understand how many people or households accessed ESS supports in response to the extreme weather events of 2021. Moreover, it makes it difficult to accurately identify for how long people accessed ESS supports. It also made it difficult to identify where evacuees were living while they were displaced and

what their needs were. Knowing how long people have been away from their homes, where they are temporarily living, and how they have been affected is critical for effectively supporting evacuees and communities – and for improving program design and delivery for future events. We were able to create the figures and tables above after carefully reviewing the ERA data that the ministry provided to us, but such analysis is not easily replicated with paper records. The absence of this critical information undermines the ministry's ability to provide effective leadership and policy direction for the ESS program.

Put simply, data collection is essential to effectively supporting evacuees and communities, and to improving disaster response and recovery in the future; it is concerning that the ministry is making decisions about program design and delivery with incomplete data. Similarly, setting clear expectations for third parties such as the CRC to share data with the province about the households they assist is essential for assessing program delivery and where gaps might exist.

The province has taken some initial steps toward improved data collection in relation to CRC delivery of emergency supports. When CRC reported to the province on its involvement with the response to the 2021 atmospheric river, it identified the need to establish data-sharing agreements to foster a more collaborative and transparent process and facilitate appropriate provision of information to local authorities. In one of its contracts with CRC to deliver supports related to the 2021 events, the province required CRC to "make best efforts to seek consent from all registered households to share household-level personally identifiable data with local authorities and the province." The contract also stated that the province and CRC will collaborate to "outline data sharing processes, policies, and controls."

We are encouraged by the ministry's efforts to embed data sharing into its contractual agreements with CRC for the delivery of emergency supports, and we recommend that any future contracts initiated by the province require a comprehensive reporting back to the province, as well as affected First Nations and local authorities, including information about the households that received emergency supports and the amount and nature of the support provided by the third-party contractor. We expect that the ministry will further support local authorities and First Nations, as requested, to include similar reporting requirements in future third-party contracts for local delivery of ESS.

The ministry plans to improve its data collection with the introduction and continuing roll-out of the digital Evacuee Registration and Assistance platform. As noted above, local ESS programs may choose to use the ERA tool or may continue to use paper forms, or a combination of both. While there are obvious benefits to using the digital platform, adopting the new technology brings training, technical, infrastructure and administrative costs for local authorities and First Nations.91 As of February 2023, 79 communities (including 14 First Nations) were using ERA, and the ministry is encouraging local communities to use it, with the minister saying, "Our goal is to get every community on it."92 Funding from the Community Emergency Preparedness Fund⁹³ will help some communities in transitioning to ERA, but it remains unclear how quickly local authorities will be able to complete the transition.94 The ministry has committed to the ongoing roll-out of the ERA tool in its most recent service plan, indicating that it will continue to engage with communities to implement the ERA tool with an updated guide, resources and support. The service plan further establishes a performance measure for the onboarding and use of the

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ERA tool, with a target of 100 percent of eligible communities onboarded and using the ERA tool by 2025/26.95

Digitizing the administration of ESS will go a long way in improving record-keeping, but it is not a complete solution. We heard from local ESS teams about limitations in the platform's reporting and analytical capacity, particularly for use in the field. We expect that continued development of ERA will include collaborative development with local ESS teams to improve the usefulness of the platform in service delivery. We also heard from ESS responders about the importance of building flexibility and redundancy into the administration of ESS as the digital self-serve options will not effectively serve people without technical literacy and/or access to smartphone, computer and internet technology required to use ERA. The ministry has noted the continuing use of paper forms as a reliable contingency option for administering ESS registration and referrals.

In relation to the 2021 events, we find that the ministry's failure to collect comprehensive data about evacuated households was an unreasonable procedure, contrary to section 23(1)(a)(v) of the *Ombudsperson Act*, in light of its responsibility to provide leadership and policy direction for the ESS program. As a result, EMBC did not have a full understanding of how many people received emergency supports, what supports they received and for how long they received those supports. However, we are hopeful that the ongoing adoption of ERA by local authorities, First Nations and third-party service providers will improve the ministry's access to relevant information about the ESS program. We understand that some local authorities and First Nations will require significant support from the ministry to train local ESS teams and ensure that the necessary technology is available in each community to run the ERA tool.

Finding 1: Emergency Management BC did not have a comprehensive framework for collecting and analyzing data about evacuated households that received emergency supports in 2021, which was an unreasonable procedure under section 23(1)(a)(v) of the *Ombudsperson Act*.

Recommendation 1: The Ministry of Emergency Management and Climate Readiness work with local authorities and First Nations to evaluate the adequacy of training, financial and technical support provided to local authorities and First Nations to transition to the Evacuee Registration and Assistance (ERA) tool by December 31, 2024, and provide additional assistance, as necessary to achieve the successful onboarding of every eligible local authority and First Nation to ERA by March 31, 2026.

Recommendation 2: The Ministry of Emergency Management and Climate Readiness work with local authorities and First Nations to, by December 31, 2026, develop and implement a process to support the collection of socio-demographic data on Emergency Support Services consistent with the requirements of the Anti-Racism Data Act.

Accessing emergency supports: Challenges and barriers

Supporting basic needs in the immediate period after a disaster is important for individual and community well-being. People who lack access to resources after a disaster experience more stress, depression, mental health distress and other health challenges.96 Disasters can also affect the attitudes of people who experience them, including by diminishing hopes for the future. Providing timely supports to those affected can ease this effect, lessening burdens and maintaining people's aspirations for the future.97 Ensuring that displaced people have access to basic goods and services is also important at the community level, in part because it eases social tensions between displaced people and host communities.98

The impacts of extreme weather events such as wildfires and flooding are not felt evenly across our society. The existence of institutional and systemic racism, sexism, and other forms of discrimination all affect the

ways in which disasters impact people. The most vulnerable people are disproportionately affected by disasters, and existing social inequities in BC are exacerbated by the impacts of disaster and climate change. 99 An effective emergency support system must be responsive to the people it is providing for and consider individual and community diversity and complexity to achieve outcomes that are fair to everyone.

How emergency support is provided matters

The input we received through our questionnaire reiterated the critical importance of emergency supports. For many, receiving emergency supports was essential to meeting their needs in the hours and days after the 2021 emergencies. Most questionnaire participants who accessed emergency supports found them somewhat or very helpful, with 12 percent responding that they were not very or not at all helpful.

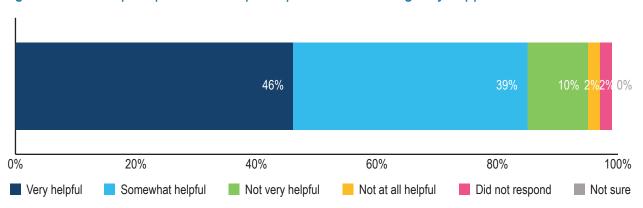


Figure 7: How helpful questionnaire participants found emergency supports

Note: Percentages in figure may not total 100 percent due to rounding

Many people emphasized the importance of being treated with empathy and respect by ESS responders. People told us they were grateful for the effort of the volunteers and staff working to help others. Questionnaire participants shared the following comments regarding positive experiences with ESS: "The [volunteers] were very compassionate, helpful, and understanding. They made sure we were ok and had everything we needed to get through the first weeks of the recovery period."

"Overall, I think everyone did a wonderful job considering how many communities were affected. . . I am grateful for the efforts of many people, despite being under pressure themselves."

"I feel that ESS did a good job considering the amount of people they had to help, and the constraints of their duties."

"Fantastic support, with one-on-one followup from ESS. . . As a result of my positive experiences . . . I have now volunteered to join our local ESS."

"My overall experience with ESS was great."

"I am thankful for the help I received, and for all the volunteers."

"The people who helped me register for services were wonderful – knowledgeable, friendly, kind."

We also heard that being treated rudely or disrespectfully made people feel unsupported:

"I walked out [of the reception centre] in tears because they were so cold and uncaring."

"I wish that the people working in the evacuation centres were a little more kind."

"I personally stopped off at the emergency services and there were two people out there and I asked them what we should do, and they just shrugged their shoulders and said we're closed." Other participants were not treated rudely, but experienced challenges working with volunteers who were overworked or overwhelmed. These participants told us that:

"Staff were tired and overwhelmed by the time we registered in person."

"Some of the volunteers were not fully prepared or overwhelmed by their own circumstances."

Being able to access helpful supports in an emergency is critical to supporting people's well-being after the trauma of a disaster. These first-hand experiences of ESS, both positive and negative, show the need for a robust, fair and equitable ESS program that treats people with kindness, compassion and respect.

In the following sections, we describe what we found to be the primary challenges people experienced when they tried to access ESS in the aftermath of their evacuation. We outline our findings as to the reasons people experienced these barriers and make recommendations for improvements to the ESS program.

Long and confusing waits to access supports

The concern we heard most in our questionnaire from people who were displaced and tried to access ESS was about long waits at reception centres. Many also noted delays in receiving their vouchers. Almost half of the questionnaire participants experienced long waits at service centres, and over a quarter identified delays in receiving support.

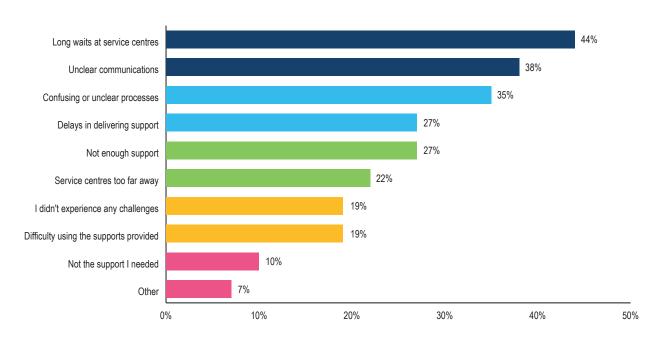


Figure 8: Proportion of questionnaire participants who experienced various challenges accessing emergency supports

Note: Multiple choice question. Percentages in figure will not total 100 percent.

We heard about the trying conditions that people experienced when they were waiting at reception centres. People described waiting in long lines outside of buildings without any greeting or information about what they could expect or how long the wait might be. Many people talked about uncomfortable conditions, particularly a lack of shade during hot and sunny weather. Because the waits were so long, some evacuees had to sleep in vehicles in the parking lot. Others left their place in the line to return the next day to wait again. Others left the line altogether. Questionnaire participants shared experiences of long waits, short service hours and too few reception centre locations.

For example, some participants told us:

"No matter where we went, the hours for support were too short, the line ups way too long."

"There was at least a four hour wait at the reception centre even though we had pre-registered. The place we were staying was an hour's drive away and we had two trailers full of farm animals we couldn't leave parked for four hours or more while we waited."

"The closest ESS to where I was staying wasn't open regularly and was hard for me to get to."

"ESS was quite far away from where people were staying. Very difficult if you did not have transportation."

"We waited 8 hours in the line up."

"Over 8 hours of time spent at the [reception centre]."

"People were staying in their cars for days waiting for ESS to find accommodations."

"[I heard people] were living in their car in the [reception centre] parking lot all the first week because lack of staff and training blocked people from accessing hotel vouchers."

"After having to register in three different towns and being turned away and our paperwork forgotten about, we were stuck in a car for almost 20 hours and told to be prepared to sleep in it."

"There needs to be a triage. People who are displaced due to inconvenience and people who are leaving with the clothes on their back are not the same."

In addition to the long waits at reception centres, questionnaire participants told us they experienced unclear communications and unclear or confusing processes as they tried to access ESS support. In some cases, questionnaire participants shared concerns about poor communication and confusing processes, including:

- lack of clear information about how and where to access supports
- disorganization at reception centres
- conflicting information and misinformation about availability of support
- lack of information about how long support would be available for
- confusion about online registration

For example, we heard:

"There was mixed information about what city you had to register in for ESS."

"We spent an entire day in [a city] to be told at the end that they could only provide support for those staying in [that city], which is close to . . . where we were staying."

"There was lots of misinformation about what was covered and when coverage started. This all added to the stress of the situation."

"After initially signing up online . . . we went to ESS check-in 36 hours later to find they wanted all the same information given online."

"We were very grateful for the supports offered to us. We probably wouldn't have applied though if it hadn't been for word of mouth amongst others who were affected by the flood. There were no announcements about making sure that victims should apply immediately after the event."

"Two elderly ladies had nothing and had to pay a significant taxi fare twice because the volunteers they met with originally didn't go through the process properly."

We heard that for most evacuees, the only way of getting accurate information about ESS was to speak directly with an ESS responder at a reception centre. However, it was difficult for people to speak directly to an ESS responder because of the long waits and, as a result, information was shared informally by evacuees in the reception centre lineups and then further afield on social media. While much of this information was accurate and helpful, some was inaccurate and misleading, leading to rumours and more confusion among evacuees. Many ESS recipients told us that the lack of clear communication led to uncertainty and compounded the stress caused by delays because people didn't have enough information to make decisions in the best interests of their families.

The information we gathered in our investigation echoes similar stories from past events. In *Addressing the New Normal*, Abbott and Chapman describe "the urgent need for accurate, real-time information during emergencies. In the absence of

such information, especially in the age of social media, misinformation tends to fill the vacuum and heighten anxiety."100

Disproportionate impacts of long and confusing waits

The long waits were especially onerous for people with circumstances that made it difficult to wait in line, including those with physical or cognitive disabilities, caregivers, older people, and people with pets or farm animals. For some people in those circumstances, these waits became a barrier to service.

Questionnaire participants shared difficulties experienced by people with health challenges or disabilities who were unable to attend or struggled to wait in line at a reception centre. They said:

"As a person with a registered disability that affects mobility it was very painful and draining to stand in long lineups and wait for hours to register at an ESS that has limited seating and no seating for the outside lineups and no parking which requires walking a distance."

"The people who couldn't travel to the ESS centres had a terrible time accessing help."

"Due to mobility and financial difficulties . . . I could not get to an ESS centre and could not wait hours in freezing cold to gain such services."

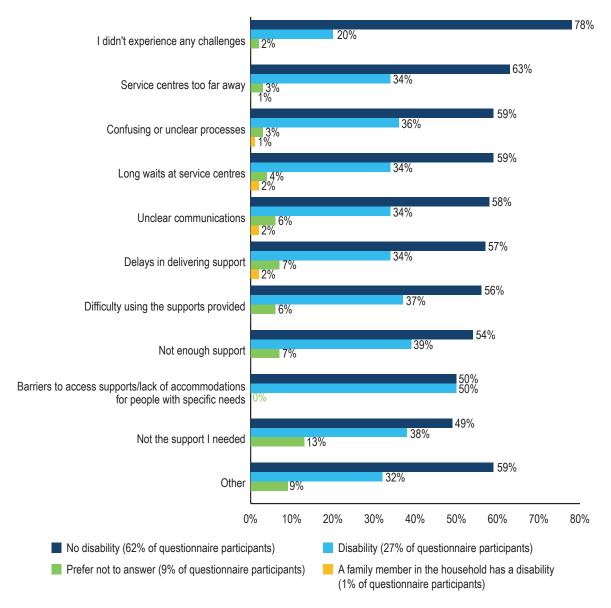
[There was] "nothing for people who could not physically stand in line like me. This is why I did not get help for a week." "Registration was a real problem for us because my wife is in a wheelchair and the long lineups, time involved (including access to washrooms), and access to the facility to register was not wheelchair friendly."

"The wait time was horrible, stood in line for several hours with a disability."

"My husband had severe dementia and Alzheimer's and did not cope well with all the changes and uncertainty. He was frail and it was hard for him to stand in line."

A long wait at reception centres is one of the many challenges that people with disabilities faced in accessing emergency supports. Our analysis of socio-demographic data from our questionnaire indicates that participants with a disability experienced challenges in accessing emergency supports more frequently than participants without a disability. Conversely, 78 percent of people who did not experience any challenges accessing emergency supports did not have a disability. Questionnaire participants with disabilities were overrepresented in every type of challenge identified, as seen in Figure 9, which disaggregates participants' responses by their stated disability status. When viewing the figure, note that 27 percent of all questionnaire participants said they had a disability, 62 percent indicated they had no disability, 1 percent said that someone in their household had a disability and 9 percent did not respond to this question.

Figure 9: Proportion of questionnaire participants who experienced challenges accessing emergency supports, by disability status



Note: Multiple choice question. Percentages in figure will not total 100 percent.

Some questionnaire participants experienced inequitable service delivery because the way they were expected to access or use emergency supports did not accommodate their disability or health condition:

"There was no support for my husband, who was Covid positive. ESS could not accommodate him due to him having Covid and we couldn't find anywhere for him to go."

"My medical supplies (hearing aides, sleep apnea supplies, prescribed glasses) & equipment (orthopaedic bed, stairlift) were destroyed in the fire [and] can't be replaced due to lack of medical doctor's notes, which were destroyed."

"[There was not enough support for] my teen daughter who has Type 1 Diabetes."

One participant described caring for a family member with a badly injured foot, who was using a walker. She described being denied supports for accommodation because she had a trailer her family could live in. She told us:

"A small travel trailer is NOT equipped to handle a walker."

Another participant told us there was inadequate accommodation for deaf people. Another participant described having knee replacement surgery only days before the floods, but receiving no ESS supports because of not knowing they were available.

The experiences shared above illustrate how difficult it was for some people with disabilities, limited mobility and other health challenges to access the supports they needed. While the requirement that all evacuees wait in line to receive supports on a first-come, first-served basis appears neutral and fair because it treats everyone the same, it has the effect of placing people with disabilities, limited mobility and other health challenges at a significant disadvantage because of their personal circumstances. In 2021, the requirement that all evacuees travel to a reception centre and wait in line to receive supports on a first-come, firstserved basis was unfair because it created significant hardships and became a barrier for many people with disabilities, limited mobility and other health challenges to access the supports they needed.

What we heard about equitable access to emergency supports

In our investigation, other evacuees identified similar concerns – that the ESS program was not responsive to, or did not meet, their diverse needs. These inequities were primarily related to race, family composition and a person's caregiving responsibilities and socio-economic status. These experiences are described below.

Supporting caregivers

A person's vulnerability to harm during displacement can be influenced by age and family status. Older people and children are often dependent on others during disasters. In many cases, women are primarily responsible for the care of children and older people. Family composition can also make people more vulnerable, with single-parent families tending to be more economically marginalized and less able to adapt to displacement. Large families may have increased financial burdens that affect their ability to adapt and recover. 101 In our questionnaire and other information gathering, we heard from people in caregiving roles who had trouble accessing ESS support.

We also heard that people responsible for caring for pets and other animals encountered difficulties accessing ESS supports. We heard that there was very little space at reception centres to accommodate pets during the long waits and that it was very difficult to secure enough pet-friendly hotel rooms. Several participants in our questionnaire told us they slept in their car because there was no hotel that would accept their pet.

Questionnaire participants told us about the added burden and difficulties they faced in accessing ESS supports while caring for family members and for pets and other animals. They shared the following experiences:

"I have two children with mental health problems, and it was very difficult for us to stay in two rooms in a hotel. We are a family of seven. My autistic son needed more space, but it was not available."

"The lines were so long that three times I gave up because it meant leaving my palliative care mom unsupervised."

"It is difficult to identify the turmoil the event has created for our family. We are grateful for friends that have enable[d] us to be together, but four people, two 100lb plus dogs, 2 budgies and a cat gives a challenge. Not to forget the 50 chickens all that had to be rehomed. Not easy!"

"Having to drive to multiple evacuation centres was a challenge too. This year they were over capacity and had little space for people with animals. . . . I had no support for my dog, I was told to give her up, but opted to live in my car with her for a few weeks before I begged ESS to grant me accommodation."

"We were told our time was up the minute evacuation was rescinded. Demanded that we leave establishment. Had 78-year-old mother in tow and two large breed dogs. No transportation nor given time to arrange transport home."

Supporting affordability

Disasters and displacement affect people from every socio-economic background but have a disproportionate financial impact on people who, before the disaster, had lower incomes and fewer financial assets. For example, the cost of personal insurance can be prohibitive for many people with lower incomes, leaving them more vulnerable to financial loss in the event of damage caused by a disaster. Similarly, the cost of owning a personal vehicle may be prohibitive, making it very difficult to travel if evacuated. 102 Having fewer financial resources to navigate the impacts of displacement can reduce adaptive capacity and increase the risk of harm and loss following disasters. 103

Many questionnaire participants commented on the inadequacy of the supports they received. We heard concerns that:

 support was not provided for an adequate length of time

- support was not backdated, even when delivery was delayed
- support rates did not cover costs
- specific support requests were denied

 individual participants reported
 being denied assistance with housing,
 clothing, fuel, diapers, medications,
 mental health support, pet supplies, and
 money to contribute to host families

Questionnaire participants described the following experiences:

"I needed socks and winter boots for my kids as we had 5 minutes at 11:00 at night to get out of the house. We didn't get vouchers for these."

"I had to sleep on the floor for a month with a newborn baby because I couldn't afford to buy a bed to sleep on at a family member's house."

"We were not backdated for our hotel stay and have not received reimbursement for how long ESS took."

"There were no vacancies at motels and evacuees had to leave town or sit in an uncomfortable chair to sleep."

"[My insurance] couldn't give me rental support until I found a rental, so I didn't get that financial aid until September. The stress of finding a rental was insane. Four places I looked at ended up flooding before I could sign any agreements. This is why I returned to ESS and begged for a bed and shower as I was not having luck and it felt like disaster was everywhere."

Supporting flexibility and personal choice

In 2021, people who were eligible to receive ESS received support in the form of vouchers they could use to purchase necessary supplies at specified local businesses. The businesses could then seek reimbursement from EMBC. We heard concerns from evacuees about the voucher system. The

As a person with a registered disability that affects mobility it was very painful and draining to stand in long lineups and wait for hours to register at an ESS that has limited seating and no seating for the outside lineups and no parking which requires walking a distance.

- evacuee

The lines were so long that three times I gave up because it meant leaving my palliative care mom unsupervised.

- evacuee



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use of vouchers appears, on its face, to be a neutral practice: all evacuees receive access to the same options for various categories of need. However, some people are unable to make full use of these options for a range of reasons outside their control.

Questionnaire participants shared difficulties they experienced when trying to use their referral vouchers. These included:

- lack of variety in places to eat or shop
- vouchers for specific grocery stores or restaurants that were too far away or open for limited hours
- accommodation providers refusing vouchers
- vouchers that expired soon after being handed out and so could not be used
- designated accommodations being unfit
- poor treatment from service providers
- grocery vouchers that had to be spent all at once despite evacuees having no or insufficient place to store food, including perishable food

For example, we heard:

"Hotel vouchers were being denied by some hotels."

"Having to spend your entire voucher in one visit was embarrassing."

"We had limited storage/refrigeration where we stayed, but got a \$200 grocery voucher, which couldn't be used in increments, so a lot got wasted and left us high and dry when food ran out."

"Changes need to be made to ESS referral vouchers so that displaced persons do not have to buy all supplies at once, as they might not have a refrigerator to store perishables or transportation and capacity to carry everything back to temporary accommodation."

"The help offered was very rigid, for example you could only procure items from [one specific grocery store]. When you go through a trauma the last thing you want to do is go to a crowded [grocery store]."

"Absolutely horrible to make someone travel that long way and then wait in long line ups, just to get their vouchers and have to travel all the way back home."

"By the time we finally received our vouchers we had two hours to use them before they expired... There seemed to be a lot of manual work and paper documents that had to be passed to multiple levels of people in the organization."

"Extremely difficult for food choices when you are on a special diet for health reasons."

Many evacuees relied on ESS to meet their ongoing needs because they were unable to return to their homes for months after a wildfire or flooding event. As ESS extended from days to weeks for some evacuees, the way in which vouchers limited choices around food and lodging had increasing significance for those who relied on this support. We also heard that the voucher system excluded some evacuees from receiving ESS support altogether. For example, in a small number of cases we heard that evacuees who travelled outside of the community where they originally received a referral voucher were unable to use those specific vouchers because they were not accepted by suppliers outside of the community the evacuee received the voucher in. In other cases, we heard that evacuees who travelled outside the province were not able to access ESS supports because the referral vouchers were limited to suppliers within the province.

Vouchers also have the effect of identifying a user as an evacuee when obtaining goods and services. Since a person only qualifies for ESS based on having no other means of support, voucher users are forced to reveal that they lack access to financial resources, insurance, and family or friends who can assist. Several questionnaire participants noted that they experienced poor treatment by service providers when using their vouchers.

In some cases, people told us that they had a poor experience with a particular service provider, but no flexibility to make alternative arrangements. In other cases, individuals with dietary restrictions told us that they struggled to access appropriate food.

Supporting Indigenous evacuees

Indigenous communities in British Columbia, including rural and remote First Nations, have been disproportionately impacted by emergency events. 104 Because of the specific relationship Indigenous people have with the land, which is an integral part of their way of life and culture, they are also impacted differently when they are displaced from their land. 105 Moreover, the legacy of colonialism has until recently largely excluded Indigenous communities in BC from the development and delivery of emergency services they receive as evacuees or are asked to deliver as First Nations governments. 106

In our investigation, we found that Indigenous evacuees were more likely to have been displaced by a combination of fire and flooding events in 2021. Indigenous evacuees were also more likely to experience longer displacement as a result of these disasters, and they generally experienced greater challenges relating to displacement, including family separation, difficulty accessing health care, accommodation and housing. In addition, analysis of responses to our questionnaire shows that Indigenous participants were more likely to experience disability than non-Indigenous participants. As discussed above, questionnaire participants with disabilities encountered unfair barriers when accessing ESS supports. 107

In our investigation, we heard that some Indigenous evacuees experienced discrimination and culturally unsafe interactions with the ESS program. As a result, some Indigenous evacuees were unable to access the ESS supports that they needed. The reported rate of discrimination or harassment among Indigenous evacuees who participated in our questionnaire was significantly higher than among non-Indigenous evacuees: 26 percent of Indigenous questionnaire participants reported experiencing discrimination or harassment. 108 Almost one-quarter of Indigenous participants also reported disruption to cultural and traditional practices. 109

Some Indigenous questionnaire participants described the experience of discrimination or harassment in general terms without providing further details. Others reported poor treatment by staff at ESS suppliers. including grocery stores and hotels. Discriminatory behaviours ranged from rudeness to more overt hostility, with one evacuee reportedly being told to "go back home" by a worker. Other questionnaire participants who reported discrimination or harassment raised issues that overlapped with those of the general population of evacuees: long waits, poor communication, inadequate support for mental health, and unsuitable accommodations.

A member of Métis Nation British Columbia (MNBC) described the difficulties that Métis Elders experienced waiting in cars and standing in long lines in hot weather. She also told us about MNBC members experiencing rude treatment and lack of cultural awareness at a reception centre where many Métis people were seeking assistance.

Some Indigenous evacuees who identified having experienced harassment or discrimination in our questionnaire raised specific concerns related to the voucher

system. As we highlighted earlier in this report, vouchers identify individuals as evacuees who are making use of a government program. Some Indigenous questionnaire participants raised concerns about the stigmatizing treatment they received when using vouchers:

"[Grocery store] store staff treated us poorly, some with surly expressions, a very uncomfortable situation when using food vouchers from ESS."

"There was no choice of shopping with vouchers and were treated poorly by store staff."

"The grocery store staff were not very accommodating with me using a voucher, was embarrassing."

We heard from some Indigenous evacuees that the lack of flexibility in eating choices that resulted from the use of vouchers over long periods of displacement contributed to Elders being unable to obtain culturally appropriate food, with some having been unable to maintain a balanced and healthy diet throughout their displacement.

Questionnaire participants also described negative and disrespectful interactions with ESS responders and difficulty accessing adequate supports. Some Indigenous questionnaire participants described positive experiences accessing ESS, including interactions with volunteers who were patient, compassionate, hard-working, helpful and kind. However, other Indigenous participants described negative experiences, including the following:

"The ESS workers were very rude to me.
.. I was very disappointed being treated that way [being the] mother of 4 young children... I hated how I was treated."

"Staying in a dorm brought back memories of residential school because the doors were locked after 11."

"I found staff of ESS were helpful but cold."

"[P]eople should never feel as though they are a burden during an ordeal. . . This has been the most difficult and stressful time of my life by far. . . . [T]o be made to feel as though I was asking too much . . . was wrong and then to top it all off we were made to feel as though we were alone in the process."

"[I] experienced racism."

"My husband was in his final life phase with bowel cancer. He was in serious pain and desperate toilet issues. He was constantly uncomfortable. We lived in our 20 foot motorhome and surfed from parking lot to parking lot. No offer of help, no help no communication of anyone able to help."

"Once back in [city] the month and a half seemed like ESS/Red Cross didn't care about our health needs. (Fighting to make us stay in a hotel with blood and feces on the bedding and bathroom)."

A non-Indigenous questionnaire participant also observed that "the bias shown to Indigenous evacuees was heartbreaking."

Despite the significant challenges some Indigenous evacuees experienced with the ESS system, we also heard about community-based solutions to better support Indigenous evacuees. For example, many people billeted with family and friends. We heard about an ESS collaboration with the First Nations Health Authority to provide culturally sensitive supports, including ceremony, for people impacted by the Coldwater River flooding. Tk'emlúps te Secwépemc, as they did during the 2017 wildfires, opened their powwow grounds for camping, and provided meals and supplies. This helped families and community members to stay together and be supported.

In advance of the Sparks Lake wildfire evacuation, Skeetchestn Indian Band pre-booked over 30 hotel rooms to support Elders and vulnerable people. Since the evacuation order was made at night after a sudden shift in winds, accommodations were hard to find. The pre-booked rooms helped to ensure that these most vulnerable members had accommodation. This planning helped to bring support services to Skeetchestn Elders so they did not have to wait in long lines at reception centres. There was also a room in the hotel where Skeetchestn was able to establish an information booth for their band members.

During our investigation, we heard repeatedly about the importance of relationship building and liaison work in the delivery of ESS.

One Indigenous questionnaire participant described volunteering at a reception centre to help other Indigenous people who attended after having experienced difficulties in the process of accessing services herself. She described how Indigenous evacuees felt more comfortable talking to her and that she was able to help them.

We also heard that community navigators from affected First Nations were engaged to liaise with host community emergency program staff and ESS teams and to assist evacuated community members. A community navigator is a person who helps facilitate ESS delivery by liaising between communities (both First Nations and non-First Nations) and reception centres.110 For example, Skeetchestn hired its own community navigators to assist band members displaced to Kamloops and Kelowna. ESS teams in Kamloops and Kelowna recognized the importance of the community navigators and the valuable contribution their liaison work made to improving ESS delivery at the Kelowna and Kamloops reception centres.

The First Nations' Emergency Services Society of British Columbia (FNESS) shared some positive examples of how it was able to connect people with resources who otherwise might not have received them or might have encountered difficulty receiving them. In one case, one of FNESS's Regional Recovery and ESS Specialists heard about three families from Sumas First Nation who had been evacuated to Abbotsford two weeks prior but had not received ESS supports. The specialist travelled to the hotels where the families were staying and assisted them through the ESS registration and referral process. FNESS reported that because the specialist was able to travel to the families. introduce herself and share her background, she was able to develop a relationship and help them to navigate the ESS system. FNESS staff continued to work at the Abbotsford reception centre as a liaison for First Nations and Métis families until the reception centre was deactivated. FNESS reported that the local ESS team recognized the importance of FNESS's liaison work and the valuable contribution it made to improving ESS delivery at the Abbotsford reception centre.

These examples show how communitybased approaches to cultural safety helped Indigenous evacuees access services and created more positive outcomes.

Analysis: Ensuring equitable access to emergency supports

The experiences of evacuees shared above demonstrate the ways in which a onesize-fits-all model of emergency supports unfairly creates barriers for some people to access the support they need. All too often, those barriers are faced by people who are disproportionately impacted by extreme weather events and who have the fewest resources available for recovery – including Indigenous people, people with disabilities, lower-income households, older people and children, people with physical and mental health needs, and other people experiencing social marginalization. Most troublingly, we found that some Indigenous evacuees experienced discrimination and culturally unsafe interactions with the ESS program. As a result, some Indigenous evacuees were unable to access the ESS supports that they needed.

We also found that some families and older people experienced similar difficulties accessing ESS support, particularly those caring for family members with more complex health needs. We found that the limited way in which ESS supports were provided, through vouchers and limited hotel accommodation, made it difficult for some caregivers to provide the necessary care for dependent family members. We also found that the voucher system limited the ability of some people to fully use the supports they needed. Although it was clear in our investigation that individual experiences varied, we found that overall, the program did not sufficiently account for existing disadvantages of evacuees, resulting in inequitable access and outcomes.

Finding 2: The way in which Emergency Support Services were delivered in response to wildfires and the atmospheric river in 2021 was an unfair procedure under section 23(1)(a)(v) of the *Ombudsperson Act* because the program did not adequately account for existing vulnerabilities among people who were trying to access the services. As a result, people experienced inequitable access and outcomes based on factors including Indigeneity, physical ability, health, age, family status and income.

Embedding equity in service delivery

The ministry's *Emergency Support Services Program Guide: The Heart of Emergency and Disaster Response* (2022) includes a new section on supporting people experiencing vulnerability. The program guide states that ESS teams must recognize barriers to accessing services equitably and seek to provide services without judgment or bias. The technical paper on the modernized legislation also references the importance of cultural safety and the need for consideration of disproportionate impacts.¹¹¹

While we are encouraged by the ministry's commitment to improving equity, our investigation highlighted the need for further work to achieve more equitable outcomes in the practical delivery of ESS.

Our focus on equity parallels the BC Human Rights Commissioner's call for a "human rights-based approach" to emergency management. In her 2023 inquiry report, the commissioner described this approach as one that:

... acknowledges that while emergencies and disasters, whether natural or human caused, are indiscriminate as to who is affected, the impact of them is not. In a human rights-based approach, marginalized and vulnerable people, including recipients of aid, are involved in all stages of emergency planning in an active, voluntary and meaningful way. Their needs are addressed as basic human rights, and programs and policies are aimed to build their capacity.¹¹²

Striving for equity means recognizing harms and dismantling discriminatory rules, systems and cultures. Programs and decision-making processes, including those that appear to be neutral and fair, may be inadvertently or purposefully structured in a way that is inequitable and discriminatory. This leads to less favorable outcomes for certain groups of people because of their personal circumstances. Equitable programs start from the premise that equal provision of services and resources is not always sufficient; some communities and individuals need more services and resources to achieve equitable outcomes and meet program objectives. 113 We have highlighted some of the areas where further work is required to ensure that all people can get the support they need in the aftermath of a disaster event.

Supporting cultural safety

The discrimination and cultural unsafety experienced by Indigenous people is not new or unique to the ESS response in 2021. Rather, these experiences reflect a historical pattern of Indigenous-specific discrimination and inequitable service delivery in provincial emergency management. After the 2017 and 2018 wildfire and flood seasons, five separate after-action reviews described the experience of discrimination and culturally unsafe interactions that Indigenous evacuees had with the emergency management system in BC, including the ESS program.¹¹⁴

These reviews describe a range of experiences, including Indigenous families being separated over the course of their evacuation period and the parallels between group lodging in community centres and the

experience of residential school survivors. The reviews cite rude and disrespectful treatment by hotel and restaurant staff when Indigenous evacuees tried to use the vouchers provided by the ESS program. A review conducted by the Government of Canada noted the lack of space for Indigenous evacuees to practise traditional activities and prepare traditional food, as well as the lack of comfortable space for Elders and expectant mothers. A review conducted by First Nations Health Authority highlighted the limitations of the voucher system for Indigenous evacuees and the lack of ESS training for community navigators who accompanied evacuees and were expected to help them navigate and access the ESS program.

In addition to identifying these difficult experiences of discrimination and cultural unsafety, the reviews recommend Indigenous-led, community-based solutions for improving cultural safety and creating more equitable outcomes. These include creating culturally safe evacuee lodging and support arrangements, increasing daily rates for billet hosts, increasing cultural awareness and sensitivity training for ESS volunteers and all emergency management personnel, ensuring that traditional language services are available for evacuees, and incorporating cultural considerations and First Nations knowledge more widely in planning and response coordination.115 In its review, The Fires Awakened Us. the Tsilhqot'in National Government identified the need for community longhouse gathering centres with kitchens and lodging, traditional arbour and camping areas for evacuees, and traditional healing ceremonies and addictions and counselling supports.

Métis Nation British Columbia has similarly identified several Métis-led initiatives in the context of ESS, including developing a custom ESS training program that would prepare Métis and non-Métis volunteers to support Métis citizens.¹¹⁶ MNBC states

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that developing its own training for ESS volunteers will better support Métis evacuees. Recognizing that local and provincial governments may have little awareness of Métis experience, MNBC identified the need for a trained Métis liaison to integrate into local emergency operations centres or the provincial emergency response to ensure that Métis needs are considered and met.¹¹⁷

These community-based solutions and recommendations centre on the importance of including the expertise, knowledge and resources of First Nations and Métis people in the development and delivery of emergency systems, including the ESS program. These solutions are necessarily informed by a broader structural commitment to reconciliation and recognition of Indigenous Peoples' right to self-determination, which we discuss further below.

The ministry has made commitments to embed cultural safety in the provincial emergency management system. In 2019, Emergency Management BC signed a **Declaration of Commitment to Cultural** Safety with the First Nations Health Authority. The health authority defines "cultural safety" as "an outcome based on respectful engagement . . . [resulting] in an environment free of racism and discrimination, where people feel safe when receiving health care." The declaration outlines a plan to embed cultural safety and humility in the training, orientation, policies and practices of EMBC, including developing strategies and work plans to track, report and evaluate progress.

Currently, there is no ministry-led plan to support the strategic integration of cultural safety across the entire ESS system. However, some steps are being taken. In October 2019, the province reported that EMBC-sponsored Mobile Support Teams had completed basic cultural safety training and that EMBC was providing funding and exploring opportunities to provide more

in-depth and ESS-specific cultural agility and cultural safety training to all emergency management staff and ESS volunteers as a component of the core ESS training programs. The efforts to improve cultural safety training are intended to implement the *Addressing the New Normal* recommendation that the province require ESS volunteers to participate in cultural awareness training. 119

Expanding cultural awareness and safety training is widely seen as an important component in improving culturally safe outcomes.120 In our investigation, we heard criticism of the current ESS training curriculum delivered by the Justice Institute as primarily focused on the urban environment, lacking in cultural relevancy and failing to include the unique and varied experiences of rural and remote First Nations and Indigenous people in emergency response and recovery. We heard about the importance of Indigenous people developing relevant course content and curriculum for ESS training, as well as the need for specific Indigenized training for ESS delivery by First Nations themselves. Some of this work appears to be underway, although it is in the very early stages. For example, the Ministry of Emergency Management and Climate Readiness has undertaken a review of the curriculum delivered by the Justice Institute, is working with FNESS to develop First Nations-specific ESS training, and is exploring options to deliver this training closer to or in First Nations themselves. The ministry further points to recent Community **Emergency Preparedness Fund funds** allocated to support local authorities and First Nations in integrating cultural safety into local ESS programs. 121

Additionally, in August 2022 the ministry released the updated guidance document for the ESS program. The ESS Program Guide highlights the First Nations Health Authority's Declaration of Commitment to Cultural Safety and sets out two new policies designed to ensure cultural safety in the delivery of ESS.

These policies authorize community navigators and First Nations community navigators as an eligible expense for which First Nations and local authorities can receive reimbursement from the ministry. In addition, the policies formalize the use of the First Nations community navigator, identified by and at the discretion of the impacted community, to support community members with ESS supports as well as supports not commonly offered at the ESS reception centre or a group lodging facility. 122 The ministry also advises that it has developed a process with the First Nations Health Authority to address racism experienced in the ESS program.

In addition, these new policies authorize Cultural Activity Locations Support as an eligible expense for which First Nations and local authorities can receive reimbursement. The rationale for this new policy is that it is important to provide trauma-informed and culturally safe services to lessen the impacts of evacuation and support a more effective transition to recovery. The policy recognizes that some communities may prefer to designate space separate from ESS reception centres to provide these services.¹²³

The updated ESS Program Guide also sets out a list of "wise practices" intended to support cultural humility and safety. These include:

- Recruiting Indigenous people and youth as ESS responders
- Engaging Indigenous leaders in all decisions that might impact their communities (this can also be achieved through the First Nations community navigator role)
- Facilitating the creation of "host community agreements" between First Nations and neighbouring communities to access facilities for Cultural Activity Location Support, such as Longhouses,

- Big Houses, Nation-owned buildings and Friendship Centres.
- Integrating cultural safety and humility training into monthly ESS team meetings.
- Sharing the Indigenous history of the local area with all volunteers

We are encouraged by the commitments the ministry is making to stop discrimination, improve cultural safety and support equitable outcomes. 124 We understand that in order to realize these outcomes in the ESS program, legislative and policy commitments must be put into practice at the community and service delivery levels, where people experience ESS directly.

In this respect, we emphasize that safety is defined by those who are receiving a service, not those who provide the service. Ultimately, the assessment of whether a service is culturally safe must come from Indigenous emergency management practitioners and evacuees working within or receiving services from the program. We strongly encourage the ministry to continue its work to embed culturally safe practices into all aspects of the ESS program and to do so in partnership with First Nations and Métis Nation British Columbia. In addition, in light of what we saw in our investigation, we recommend that the ministry develop a robust process for assessing and evaluating the impact of these policy and program changes in relation to actual service delivery. In other words, the ministry needs to have a process for receiving meaningful and timely feedback about cultural safety from people who are using ESS services and use this to inform ongoing program changes.

Recommendation 3: The Ministry of Emergency Management and **Climate Readiness work with First** Nations, First Nations' Emergency **Services Society, Métis Nation British** Columbia, the First Nations Health Authority and other Indigenous partners to integrate cultural safety across the entire Emergency Support Services system, including developing and implementing a process for receiving meaningful and timely feedback about cultural safety in the delivery of Emergency Support Services by December 31, 2025, and for ensuring that timely program and policy changes are made in response to that feedback.

Supporting community capacity and reducing waits

Many of the equity concerns we heard related to the long waits that people experienced at reception centres. Although long waits are not a widespread ESS problem, many people who were evacuated because of wildfires and flooding in 2021 experienced long and confusing waits at local reception centres to register for ESS and receive their vouchers.

The long waits were especially onerous for people with circumstances that made it difficult to wait in line, primarily related to lack of access to transportation, disability, poverty, mental health, family composition and a person's caregiving responsibilities. For some people, these waits became a barrier to service, discussed below.

The long and confusing waits occurred in part because the local capacity to deliver ESS in some communities was overwhelmed by the scale of the events and the large numbers of people who were evacuated and seeking support at the same time. In some cases, wait times were compounded by the challenges of operating reception centres during the COVID-19 pandemic.

The ESS program is primarily delivered by trained local volunteers. We heard that in some communities there were not enough trained volunteers available to register and finalize ESS referrals for the large number of people seeking help at the same time. The ministry told us that JIBC trains ESS responders to complete this process in 20 to 30 minutes, and that it is this time frame that is used for planning purposes. In our investigation, we heard that it took approximately 45 to 60 minutes for a trained ESS responder to fully register one household for ESS supports during the wildfire and atmospheric river responses. This process may take even longer when evacuees are distressed or confused about the process. In 2021, with a limited number of locally trained volunteers to do this work, it took a very long time to register and refer the hundreds of people waiting for support at individual reception centres, particularly during the atmospheric river in November.

Similarly, we heard that local ESS teams did not have enough time to explain the ESS process to all evacuees and that there was no centralized or online forum to communicate with evacuees about their ESS application.

We heard that many ESS teams felt inadequately supported by EMBC while responding to multiple large-scale (Level 3) events in 2021. We heard that ESS volunteers in Kamloops, Vernon and Kelowna often worked 13- to 15-hour days for weeks and sometimes months on end. Many of these volunteers worked during the long wildfire season in the summer and then returned to their volunteer duties again in November during the atmospheric river. Some volunteers took time off paid work to help with ESS, while others put personal plans and projects on hold. The widespread scale of the weather events and their long duration put an enormous burden on the shoulders of local volunteers, and this contributed to a feeling of burnout and

a declining number of volunteers willing to participate in the ESS program. Many volunteers told us that their efforts and work have gone unrecognized and unappreciated by the province. This too has contributed to some communities having fewer local ESS volunteers

We heard from local emergency management professionals and volunteers about ways to improve the capacity and efficacy of their reception centres and ESS teams. They told us that continuing to rely almost exclusively on volunteers to deliver ESS is not a sustainable model of service delivery in the face of climate change and the increasing frequency of extreme weather events. They explained that their community ESS programs rely on staff to carry out core ESS functions, including, for example, program planning over the course of the year, volunteer management, creating and maintaining supplier relationships, receiving calls for service, managing ERA training, direct purchasing of supplies, managing ESS extensions and evacuee recovery plans, as well as interacting directly with evacuees during complex and large-scale events. They explained that many of these critical tasks are not currently reimbursable through the program's cost recovery framework. We heard that the capacity of many local ESS programs could be strengthened by both hiring staff dedicated to supporting and delivering the community ESS program and ensuring that local programs can recover costs of existing staff that are working to deliver and administer ESS.

We also heard that ESS delivery could be improved through additional surge capacity. For example, it was suggested that the long waits experienced by people at local reception centres could have been reduced with additional trained and experienced ESS responders providing support to evacuees during large-scale (Level 3) events. We heard that it was very important that any additional surge capacity or supports be

respectful of local ESS teams and their way of delivering ESS. Providing effective surge capacity is not a one-size-fits-all solution but must be developed through partnerships between local authorities, First Nations and the ministry.

The need for greater ESS capacity is recognized by the province. The ministry told us that funding is available through the Community Emergency Preparedness Fund to help build capacity of local ESS teams. The ministry has also developed a model of surge support. For example, the ESS training manual explains that if a community is overwhelmed by a disaster and does not have access to support from neighbouring communities, the ministry may help by activating its Mobile Support Teams. The training manual describes the provincial Mobile Support Teams as composed of trained ESS volunteers who may travel to any community to assist with ESS delivery and provide on-site training for residents to assist them in organizing ESS during an evacuation.

In 2021, the provincial Mobile Support Team was made up of 20 volunteers, but only two members were able to assist ESS teams in the southern Interior for six days during the wildfire season. The ministry explained that because of lessons learned in 2021 it hired four "as and when" ESS training specialists willing to deploy to fulfill roles previously fulfilled by Mobile Support Team volunteers. The ministry explained that it expects this group will expand to six members, with potential for further growth.

Emergency professionals and volunteers told us that long waits at some reception centres were exacerbated by a lack of communication during the evacuation period. For example, we heard that receiving advance notice of evacuee movement to respective reception centres, from local

governments or the ministry, would help local teams to prepare necessary community supports for evacuees with complex needs.

The ministry told us that it expects the ERA tool will reduce long waits at local reception centres by increasing the number of people who self-register for ESS, reducing the number of people who need to access services at a reception centre, and increasing the number of ESS responders available by enabling remote support from ESS teams outside of the impacted or host community. In addition, the ministry expects that the e-transfer model will reduce the amount of time volunteers spending processing referral and distributing assistance. The ministry intends to keep systems in place to support those who are unable to self-register or who will continue to require a significant amount of time to register – for example, evacuees without ID or access to online banking.

When a major disaster occurs, the system needs to be able to scale up quickly to provide supports in a timely and equitable way. This did not happen in 2021 when, as we have described, many evacuees experienced long waits at reception centres that made their situations more stressful. For some people, these long waits created a barrier to receiving ESS. They were unfair for some evacuees and reflected a system that was overwhelmed by the scale of the event and the large number of people who required assistance at the same time.

While we agree that the ERA will contribute to the more efficient administration of ESS, our assessment of what happened in 2021 suggests that the ERA tool is not sufficient to fully mitigate the long waits that can happen in a disaster.

For this reason, we recommend that the ministry work with local authorities and First Nations to develop supportive models of surge support that can be implemented quickly when needed. While we are encouraged by the steps the ministry has taken to build capacity of its Mobile Support Team by hiring staff to fulfill the roles previously fulfilled by volunteers, the need to build ESS capacity extends beyond this small provincial team. Given the "as and when" model for the current small training specialist team, incremental costs would be minimal even with substantial expansion of the team's size. Given the complexity and demands of delivering ESS during large-scale events, we are concerned that the delivery of ESS relies almost exclusively on local volunteers, some of whom may have been evacuees themselves. We recommend that the ministry work with local authorities and First Nations to develop a framework that better supports flexibility and resilience in the local delivery of ESS, including resources and cost recovery for staff working to deliver and administer ESS. Building capacity to support communityled responses is consistent with the Sendai Framework, which aims to empower local authorities and communities. 126 It is also something that was identified in Addressing the New Normal, which recommended a "strategic shift" to "establish emergency centres of excellence in Interior locations to support large-scale disaster response." The report described such centres as being "of sufficient size, capacity and organization to manage a large influx of evacuees on short notice."127

We also recommend that the ministry work in partnership with local authorities and First Nations to improve communication to evacuees about ESS. While communication

about ESS falls primarily to local authorities and First Nations as front-line ESS service providers, the ministry has responsibility as lead coordinating agency for emergency management to collect incoming information from various sources and disseminate it in a way that evacuees can reliably access and understand. Better communication by the province was identified in Addressing the New Normal, which recommended that the province develop a central emergency communications website to provide emergency updates for evacuees. 128 The events of 2021 only reinforced the need for clear communications. As discussed above, many evacuees experienced confusion and uncertainty about availability of emergency supports and this was compounded by a lack of timely, accessible and reliable information. Increasingly in recent years, social media platforms have been used to communicate essential information in an emergency; however, questions have been raised about the extent to which these platforms can be relied on to share accurate information widely.¹²⁹ Recently, major social media platforms have banned news content for Canadian users, making it increasingly difficult for evacuees to access timely. accurate and reliable information. 130

Finally, we recommend that the ministry work with local authorities and First Nations to improve existing volunteer recognition programs to ensure meaningful provincial recognition of the important contributions made by local ESS volunteers.

Recommendation 4: The Ministry of Emergency Management and Climate Readiness work with local authorities and First Nations to strengthen provincial support and resources for the delivery of local Emergency Support Services, including the following steps:

- a. Develop and implement effective surge support for large-scale Emergency Support Services responses, including consideration of expanded use of "as and when" employees by May 31, 2024.
- b. Develop a framework that supports flexibility and resilience in local delivery of Emergency Support Services, including a review of cost recovery for Emergency Support Services work by local authority and First Nations staff by May 31, 2025.
- c. Develop and implement a strategy for improved communications to evacuees about Emergency Support Services, including a centralized communications website for providing information to evacuees by May 31, 2024.
- d. Develop a program for more meaningful provincial recognition of the important contributions made by local Emergency Support Services volunteers by May 31, 2024.

Providing safe and accessible spaces

Many of the equity concerns we heard related to the long waits that people experienced at reception centres. We heard about the trying conditions that people experienced when they were waiting at reception centres. People described waiting in long lines outside buildings without any greeting or information about what they could expect or how long the wait may be. Many people talked about the uncomfortable conditions and heightened confusion this created.

The long waits at the reception centres were especially onerous for people with circumstances that made it difficult to wait in line, including those with physical or cognitive disabilities, caregivers, older people, and people with pets or farm animals. ESS practitioners and volunteers identified the need to establish reception centres that are physically accessible to all people and that feel welcoming and familiar. Particularly in host communities that may respond to multiple Level 3 events every year, it is important that reception centres function as an effective emergency hub with space for all evacuees to sit and rest comfortably, space to share information, and designated space for cultural ceremony to take place. We also heard about the need to provide safe and secure pet care while evacuees are at a reception centre.131

We also heard about difficulty in securing adequate temporary lodging and accommodation for evacuees with larger families, and families with pets. We also heard about the unique challenges faced by people with complex health needs and their caregivers. For example, people told us about their family members living with dementia and other cognitive disabilities who managed independently at home but struggled significantly when displaced from the familiar and established supports in their homes and neighbourhoods. People also

shared stories of family members undergoing cancer treatment, others recovering from significant injuries and surgery who struggled to find adequate space and support to recover while they were displaced from home.

We heard from emergency response professionals and ESS responders about the need to support more lodging options for evacuees, outside of hotel accommodation and group lodging. This includes increasing the daily rates of billet hosts, as it is essential that billets have the resources to support evacuated families. This also includes broadening the options to ensure they meet the diverse needs of evacuated families, particularly those who are displaced from home for a longer time.

Recommendation 5: By December 31, 2026, the Ministry of Emergency Management and Climate Readiness take steps necessary to ensure that reception centres are accessible, including working with local authorities and First Nations to identify reception centre sites that are already accessible and, as necessary, improving accessibility by developing standards, conducting accessibility audits, and providing funding to address any identified deficiencies and meet any accessibility standards.

Recommendation 6: The Ministry of Emergency Management and Climate Readiness work with local authorities and First Nations to, by May 31, 2024, increase daily billet rates and broaden lodging options for evacuees, including those with larger households, people with complex health needs and people with pets.

Recommendation 7: The Ministry of Emergency Management and Climate Readiness work with local authorities and First Nations to, by May 31, 2024, implement alternate ways for evacuees to access Emergency Support Services if they are unable to attend a reception centre in person.

Integrating professional mental health care

Most people affected by disasters will experience psychological distress. The prevalence of common mental health disorders like depression and anxiety can be expected to more than double in a crisis like a natural disaster. People with severe mental health disorders are especially vulnerable during disasters and emergencies. In the aftermath of a disaster, most people will need only basic mental health supports, but a smaller number may eventually need more specialized health care.¹³²

Addressing the New Normal recommended the development of "stable and sustainable mental health recovery programs that acknowledge cultural linkages to the land and the compounding challenge of historical trauma." The province responded to this recommendation by developing British Columbia's Mental Health and Wellness Disaster Recovery Guide and an accompanying toolkit, intended to assist in facilitating "cohesive and consistent planning and delivery of psychosocial recovery activities in the aftermath of disasters." 134

It is unclear to what extent the suggested activities and services set out in the toolkit were implemented in the aftermath of the 2021 weather events, but we heard from some questionnaire participants about need for and absence of mental health supports.

They told us:

"The food and lodging/emergency clothing was helpful but no mental health supports which was desperately needed."

"It would have been invaluable if . . . there were ongoing mental health supports – including subsidized therapy – for us and our children."

"[There should be] some counselling available, almost everyone here has PTSD."

"I took medical leave from work and ended up in counselling."

"Severe mental health challenges related to losing our home and everything we owned."

While the lack of mental health supports was not necessarily a barrier to accessing ESS services, people told us about how great the need for mental health supports was during these critical times and about how scarce they were both in the reception centres and in communities.

The need for mental health supports was echoed by emergency management professionals and volunteers, who told us that the ESS registration and referral process could be improved by including professional mental health and social work support on-site at reception centres.

For example, we heard that long waits at reception centres could be reduced if additional mental health care and social work services were provided on-site. Many evacuees are experiencing a significant amount of stress and uncertainty during the time they are seeking ESS supports, but most ESS responders, while having received training in basic psychological first aid, do not have the necessary training, skill or experience to adequately support evacuees in a time of acute stress.

Disaster Psychosocial Services Program

The Disaster Psychosocial Services
Program (DPS) is a volunteer network of
200 people across the province, including
registered social workers, psychologists
and clinical counsellors. DPS is managed
by the Provincial DPS Team, under Health
Emergency Management BC, a program
of the Provincial Health Services Authority.
DPS provides psychosocial services on
request and with the agreement of an
affected community.

ESS responders explained that having professional mental health workers on-site would help evacuees manage their stress and would thus reduce the burden on volunteers who are tasked with administering the program supports through the registration and referral process. In 2021, volunteers from the provincial Disaster Psychosocial Services Program (DPS) deployed to local reception centres helped support the mental health and emotional well-being of ESS teams, but there were not enough DPS volunteers to meet the mental health care needs of evacuees. Many ESS responders described the presence of the DPS volunteers as valuable and critically important. They suggested that having more DPS volunteers on-site at reception centres to work with evacuees would help evacuees through a very traumatic experience and contribute to more efficient service delivery.

Similarly, we heard that integrating professional social work services into the early stage of ESS would help vulnerable individuals and households, including people who are using drugs, to navigate the support system, access temporary housing and access a safe supply of drugs in the community to which they are evacuated. In our investigation, we heard about the valuable work done by a small number of social workers in Kelowna (through Interior Health) who helped coordinate supports and provide basic needs for people they identified as needing additional support. Building

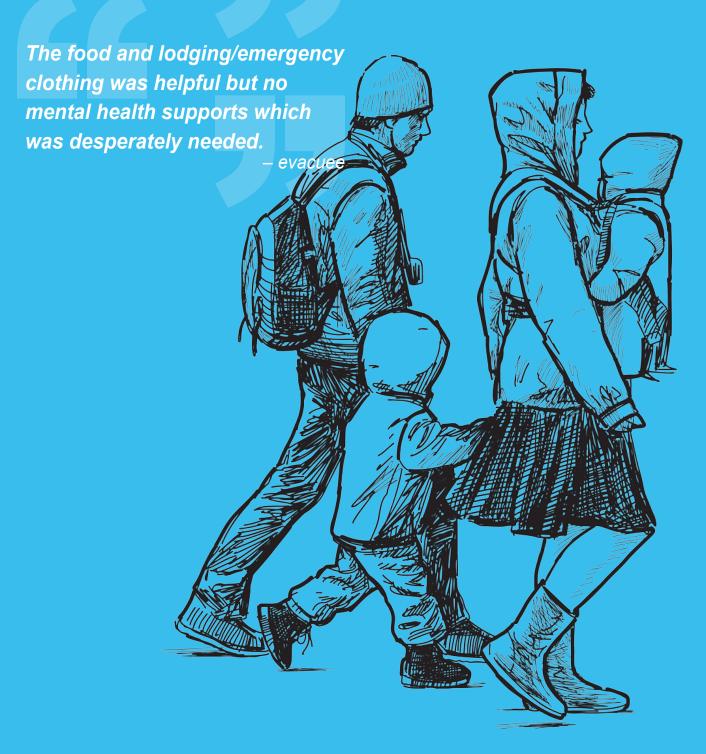
this kind of approach into the emergency response would help ensure that people who are most vulnerable are able to access appropriate supports.

Mental health support is crucial to the overall recovery of individuals and communities after emergencies. Research shows that, given the right supports and resources following a disaster, acute stress subsides, and most people experience a relatively stable pattern of healthy functioning.135 World Health Organization guidelines indicate that effective emergency response includes making mental health care available immediately for specific, urgent mental health problems that arise.136 It recommends that trained staff or volunteers who can offer emotional support to people experiencing acute distress should be available, as well as specialists who can offer interventions for people impaired by prolonged distress. The BC Human Rights Commissioner has called for "low barrier mental health supports" to be "widely available to help people with the potential anxiety, fear, uncertainty and isolation associated with emergencies."137

Incorporating effective mental health and social supports into local ESS service delivery will require an integrated crossgovernment approach that prioritizes the health of evacuees and includes the health care expertise and capacity of the Ministry of Health, the First Nations Health Authority, the provincial Health Services Authority and regional health authorities. As lead coordinating agency for emergency management, the Ministry of Emergency Management and Climate Readiness is responsible for coordinating with the Ministry of Health and health authorities, alongside local authorities and First Nations to develop and implement a strategy to further integrate disaster psychosocial first aid, professional mental health care and social work into the delivery of ESS. For this reason, our recommendation is directed primarily to the

I needed socks and winter boots for my kids as we had 5 minutes at 11:00 at night to get out of the house. We didn't get vouchers for these.

- evacuee



Ministry of Emergency Management and Climate Readiness, while recognizing the need for significant cooperation.

Recommendation 8: Consistent with its mandate to coordinate evacuee supports, the Ministry of Emergency Management and Climate Readiness work with other ministries, health authorities, First Nations and local authorities to, by December 31, 2024, develop and implement a strategy, with appropriate funding, to further integrate disaster psychosocial first aid, professional mental health care and social work into the delivery of Emergency Support Services.

Providing flexible supports

In 2021, the well-being and dignity of evacuees was impacted by a system that required them to use vouchers to access the services that would help them meet their basic needs. Evacuees are better served by a system that allows them to choose how they will meet their needs. For example, evacuees who do not have access to a refrigerator can purchase just the supplies they need for a single meal. Similarly, people who receive poor service can seek out another provider. Providing flexible supports also makes it easier for people to meet specific needs that might otherwise go unmet because they do not fit within the program's expectations about what an evacuee will require to meet their basic needs.

The way in which vouchers were administered in 2021 also contributed to challenges with the efficient delivery of ESS. Referral vouchers are paper forms that must be completed manually by volunteers working at reception centres. This is a time-consuming process. Some individuals travelled significant distances to access vouchers, and the travel contributed to stress, expense and delays in receiving

support. Where a disaster affects hundreds or thousands of people, the use of these forms becomes an obstacle to providing ESS quickly.

The voucher model also meant that suppliers were not paid up front but instead were reimbursed by EMBC after providing the services and submitting a claim. We heard that a history of delayed reimbursement by EMBC has sometimes made it hard to find suppliers willing to participate in the ESS program.

We are encouraged that the ESS program is moving away from vouchers. The shift to e-transfers should help to mitigate the delays and long lines that people experienced in 2021, allow suppliers to be paid up front, and provide evacuees with more options and better control over their immediate needs by using the ESS funding in the way that best suits their needs.

However, it is important to note that e-transfers are not a complete solution. Some people who are already vulnerable, such as people who are unhoused or who have undocumented legal status, may lack the ID and/or bank account necessary to receive e-transfers. Other people may be unable to go shopping for supplies, for example, because they lack access to reliable transportation. Truly equitable service delivery requires offering multiple options for distributing assistance to meet people's needs. In our investigation, we heard about community-driven solutions to meet the needs of people – including by providing the actual material things required, providing cheques and providing prepaid credit cards.

The ministry needs to support local ESS teams in implementing these community-driven, flexible ways of distributing assistance by providing policy guidance to support flexibility and ensuring that, whatever method of delivery is used, the cost will be promptly reimbursed by the province.

Recommendation 9: The Ministry of Emergency Management and Climate Readiness work with local authorities and First Nations to develop and implement a policy that supports multiple options for accessing Emergency Support Services, that do not rely on the use of vouchers, when e-transfer is not available or appropriate. The policy to be in place by May 31, 2024.

Developing a meaningful complaints process

Our investigation highlighted the fact that many people had challenges in accessing ESS and, for some people, that resulted in their not receiving services or receiving services that did not meet their needs. Others had concerns about how the ESS services were delivered. One of the ways in which those challenges can be addressed is through a meaningful complaints process that allows for individual complaints to be heard and, where appropriate, resolved. A complaints process also provides valuable information to decision-makers about how well emergency services are (or are not) meeting people's needs.

We recognize that creating a meaningful complaints process is complicated by the fact that ESS is delivered primarily by volunteers, organized as part of First Nations and local authority emergency management programs, and funded by the province. The purpose of developing a complaints process is not to undermine the valuable efforts of volunteers who are working hard in a challenging environment to deliver essential services. And we recognize that many local authorities and First Nations do not have the capacity to develop and implement a complaints process for ESS. At the same time, people who believe they have not been served well need to have somewhere to turn.

In our view, a complaints process is an essential way for people who feel they have not been adequately served by ESS to have their concerns addressed. Given the way in which ESS services are accessed and delivered – in high-stress environments, with decisions being made quickly – we would expect this process to be easily accessed, informal and timely. We would also expect it to be flexible and culturally safe in terms of both process and resolution, and to incorporate Indigenous approaches to conflict resolution.

For these reasons, we are recommending that the ministry work with local authorities and First Nations to develop and implement a meaningful complaints process for ESS services.

Recommendation 10: The Ministry of Emergency Management and Climate Readiness work with local authorities, First Nations and Métis Nation British Columbia to develop and implement by December 31, 2025, a timely, accessible and culturally safe complaints process that can be used by people who are trying to access, or who have accessed, Emergency Support Services.

ESS and private insurance

ESS is designed to provide a safety net rather than act as a program of first resort in emergencies. In other words, it is intended to assist people in emergencies only when no other assistance or support is available to them. Ministry policy states that people who can meet their immediate needs by accessing existing financial resources, insurance, or assistance from family or friends are not eligible for ESS.¹³⁸ ESS is not intended as an alternative or replacement for private insurance. Most residential home or tenant insurance policies contain provisions for Adjusted Living Expenses (ALE), which is intended to cover immediate needs like those provided by ESS.

Policy direction from the ministry states that ESS may be provided only "when access to a person's insurance coverage is NOT reasonably and readily available," but acknowledges that simply having insurance should not preclude a person from receiving ESS supports.¹³⁹

The 2010 ministry policy *Emergency* Social Services Field Guide: The Heart of Disaster Response, which was in effect during the 2021 extreme weather events, provided some additional information about the availability of insurance. The ESS Field Guide states that if an insured evacuee needs support and is having difficulty contacting their insurance agent, is uncertain about their coverage, or is traumatized and functionally incapacitated, ESS should be provided for up to 72 hours as usual. The Field Guide states that "people should not be denied access to Emergency Support Services because they may have insurance."140

In our investigation, we heard from evacuees and ESS responders about the difficulty in accounting for insurance availability during the needs assessment. They shared the following concerns:

"When evacuees arrive at the reception centre they are expected to know if their insurance is 'reasonably and readily available.' This is a highly subjective question and not easily answered in the stressful conditions of mass evacuation."

"[If insured] the evacuee is on their own to pay their immediate living expenses. However, they cannot submit a claim... until after they exceed their deductible contribution, which could be \$1500 or more depending on their insurance policy."

"The offloading of responsibility for interpreting and communicating poorly defined policy onto ESS volunteers has caused a great deal of stress."

"When people are traumatized by a cataclysmic event, they need help immediately. In my case, I was cold and wet, having been rescued from a home that I was trapped in for two days, no food, no water, no heat, water four feet in the house. I was boated out. No money. The town is shut down. And I'm told to call my insurance and start a claim?"

"People who are evacuated should not be forced to make an insurance claim for short-term living expenses. Insurance money takes time to come through for food and accommodation, and insurance rates then go up."

In particular, we heard concerns from local ESS teams that they were directed by EMBC several weeks into the wildfire response to more narrowly interpret their assessment of whether insurance was readily or reasonably

available. This was described by various ESS responders as direction from EMBC to "get tougher" on insurance in an effort to limit the amount of ESS being paid out in what was becoming a very long wildfire event.

This direction from EMBC several weeks into the ESS response caused confusion and concern among many ESS responders. We heard from volunteers that it was very difficult and complex to more stringently assess the question of whether a person's insurance was readily and reasonably available. ESS responders told us that many insured people found their Adjusted Living Expenses deductible to be prohibitively expensive but that volunteers did not have the capacity or resources to address this question of deductible affordability in the context of the readily and reasonable criteria. This created additional stress and confusion for volunteers, many of whom felt tasked with a practically impossible determination. ESS responders described feeling inadequately supported in the field by EMBC's policy direction and characterized their best efforts at conducting needs assessment as being unfair to the people they were supposed to help and creating unfairly differential access to ESS supports.

Like its predecessor the ESS Field Guide. the updated ESS Program Guide sets out various considerations regarding insurance availability in the context of the ESS needs assessment. As a starting point, the program guide begins by stating that ESS may be provided only "when access to a person's insurance coverage is NOT reasonably and readily available." The guide goes on to say that insurance does not immediately exclude evacuees from ESS support; ESS may still be provided on a limited basis if insurance does not provide full coverage or takes time to access. The program guide states that when people are traumatized by an event and unsure of their insurance coverage,

overnight ESS may be authorized. The guide recommends that if there are specific concerns relating to the provision of ESS to an insured individual, the responder should provide for the evacuee's immediate needs and report the concern to the regional office if needed. The guide notes that Indigenous people may have insurance provided through their band government but that this often does not cover Adjusted Living Expenses and that individual evacuees may require ESS supports. The guide further recognizes that insurance coverage may not cover evacuees during extended events and affirms that these evacuees should not be excluded from ESS supports after their coverage has ended.

The program guide requires the exercise of discretion by ESS responders on an individual case-by-case basis. This can be a complex determination that takes time and careful consideration. While ESS responders may be able to comprehensively address this question in smaller-scale events, this becomes increasingly difficult in large-scale events where the time and resources of volunteers can be quickly stretched beyond capacity.

We encourage the ministry to work together with local ESS teams to develop a policy and process to better support a consistent and efficient determination of readily and reasonably available insurance in the context of an ESS needs assessment.

Finding 3: Emergency Support
Services responders did not receive
adequate support from Emergency
Management BC in conducting fair,
consistent and efficient assessments
of whether evacuees' insurance was
reasonably and readily available
during the wildfires and atmospheric
river event in 2021, which was an
unfair procedure under section 23(1)
(a)(v) of the Ombudsperson Act.

Recommendation 11: The **Ministry of Emergency Management** and Climate Readiness work with local authorities and First Nations to, by May 31, 2024, implement a policy and other supports that will assist Emergency Support Services responders in making fair, consistent and efficient determinations of whether insurance is readily and reasonably available in the context of an Emergency Support Services needs assessment. As risks and costs increase with the impacts of climate change, needs assessments should include the affordability of insurance and insurance deductibles in the determination of whether an evacuee's insurance is readily and reasonably available to them.

Responding to the realities of longterm displacement

The 2021 summer wildfire season resulted in 181 evacuation orders and over 33,000 people displaced. 141 The atmospheric river events also displaced tens of thousands of people, including residents of Merritt and Princeton and surrounding areas, and the Fraser Valley. 142 For many, displacement was temporary, but for others the scale of damage meant they were unable to return to

their home for weeks or months. At the time of this report, in 2023, many people were still displaced, including people from the Nicola Valley, Merritt and Princeton, and the rebuilding of Lytton has yet to begin. Others face permanent relocation.¹⁴³

Long-term displacement is not unique to the events of 2021: in the summer of 2023 thousands of people have again been displaced from their homes in the Okanagan and Shuswap regions due to wildfires, with many homes being lost. Similarly, reports from the 2017 and 2018 wildfire and flood seasons indicate that about 65,000 people were displaced across the province.144 We do not know how many people remain displaced from these events, but in our investigation we heard about people, including families and Elders, who have not been able to return home. For example, Chief Chapman shared with us that Elders from Sq'ewá:lxw (Skawahlook) First Nation have been displaced since 2017 without adequate support from the federal and provincial governments to return home.

The impacts of long-term displacement due to extreme weather are significant, contributing to the erosion of individual well-being and community cohesion. Displacement affects physical and mental health, education, employment, livelihoods and culture - especially in Indigenous communities.¹⁴⁵ For example, the National Collaborating Centres for Public Health (NCCPH), in collaboration with Lilia Yumagulova, Darlene Yellow Old Woman-Munro and Emily Dicken, have published three reports as part of their Long-Term Evacuees Project. 146 This work reports that Indigenous people are more likely to be impacted by natural disasters and to experience long-term displacement, and that the consequences of this displacement are more extensive for Indigenous people and communities because of colonization, structural inequity and cultural dislocation.

The British Columbia Council for International Cooperation also published an analysis on climate change-related displacements in 2020.147 It notes that, because of climate change, the area burned in BC each year is predicted to increase, along with the severity of floods. 148 The consequences will likely include more displacement, including long-term displacement of people who lose their homes. In July 2021, the Climate Displacement Planning Initiative published a report on climate-related displacement in BC.149 The report highlights the lack of data on displacement in BC and how displacement rates may be changing with climate impacts. It notes that forced displacement disrupts people's well-being and can increase the risk of future exposure and vulnerability to climate impacts. With the increasing likelihood of more severe climate impacts, the issue of longer periods of displacement warrants greater attention.

Long-term displacement also raises issues of structural racism and other social inequities in the impacts of climate change and in the responses of public authorities. Responses to, and recovery efforts after, extreme weather disasters take place within a context of systemic discrimination and racism, including Indigenous-specific racism and the ongoing impacts of colonialism. Because of the specific relationship Indigenous people have with the land, which is integral to their ways of life and cultures, they are also impacted differently when they are displaced.¹⁵⁰

It is now well-established that extreme weather and climate change-related disasters, including long-term displacement, disproportionately impact people who are already discriminated against, marginalized and more vulnerable within society. This is true not just globally, but also here in BC. Croups that experience adverse impacts disproportionately include lowincome households, Indigenous people and communities, women, seniors, people

with disabilities, BIPOC communities and LGBTQ2S+ people – especially when these social identities intersect. For example, in the 2018 Grand Forks floods, those most impacted included women, seniors, Indigenous Peoples, and low-income, unhoused or precariously housed people. In general, these groups were more likely to lack financial or housing security, live in the flood plain, and have lower capacity to personally respond to the flood because of financial insecurity.

In light of what we know about the significant impacts of long-term displacement, our investigation examined how the province continued to provide supports as people's displacements extended over weeks and months. We focused this part of our investigation on extensions of Emergency Support Services authorized by EMBC, as well as on the extended ESS and other supports provided by the Canadian Red Cross through funding agreements with the province.

Long-term support for people who are displaced

As described in the previous sections, ESS is primarily designed to provide for people's needs for up to 72 hours. This short time is an important bridge that allows many people to move to self-sufficiency, including people who have financial resources, such as insurance; people with material resources, such as a second residence, RV or trailer; and people who have family and social connections in the community.

Those who are most impacted by the negative consequences of displacement are people who do not have these resources: people who are uninsured, who do not have material or financial resources, and/or who do not have family and social connections. These are the people who are likely to suffer most after a disaster displaces them from their homes and they are unable to return

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because of damage or destruction. They have critical needs for shelter, food and health care that are likely to extend well beyond the initial 72 hours.

The need to support such individuals and families over the long-term is an increasing reality in the context of the rising cost of living and the housing affordability crisis. We heard in our investigation that the limited availability of affordable and appropriate alternate accommodations is felt acutely in Vancouver and the Lower Mainland, where ESS is primarily used to respond to structure fires. However, it is also a concern in communities in the interior of BC, where rents and housing scarcity are increasing. The intersecting impacts of the housing crisis and more frequent climate change-induced disasters mean that when people's homes are destroyed there may not be affordable housing available in which evacuees can get settled and begin to pick up the pieces. Similarly, evacuees may be displaced longterm if their land is destroyed and there is no safe place to rebuild – in our investigation, we heard that this was a significant factor in the ongoing displacement of people from First Nations in the unceded and traditional territory of the territory of the Scw'exmx and the Nłe?kepmx Tmíxw, along Highway 8, where the flooded Nicola River caused major damage.

In our investigation, we heard that there are Elders in communities who remain displaced from the events of 2017, and that whether displacement is long or short, it involves trauma for individuals and communities that lasts for years. For example, we heard from an Elder and Knowledge Keeper who has

been unable to return to her home on reserve land because of the 2021 flooding and who is currently living in substandard housing in a neighbouring community, with no clear idea of when she might return home. We spoke with leadership of Shackan Indian Band about land and homes lost along the Nicola River where, following the atmospheric river, the Nicola River has changed course.

The challenges we heard about in our investigation also echo the findings of a March 2021 report on climate change, intersectionality and GBA+ in BC, which notes that the housing impacts of major climate-related events, such as wildfires and floods, can make it more challenging for people who are displaced, especially those with low income, to find a new home. These challenges are exacerbated by the ongoing housing crisis, which has meant that appropriate alternative housing is sometimes not available or is challenging to find when people are displaced from their homes as a result of an emergency or disaster. 157

What we heard about the need for long-term support

A majority of those who responded to our public questionnaire were displaced from their home for more than a month, and almost a third were displaced for more than three months. Among those who were displaced for more than three months, 13 percent indicated they had been displaced for six months or more, and 8 percent said they were still displaced at the time of completing the questionnaire.

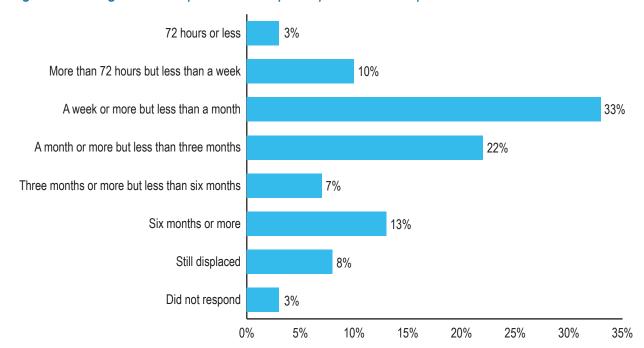


Figure 10: Length of time questionnaire participants were displaced from their homes

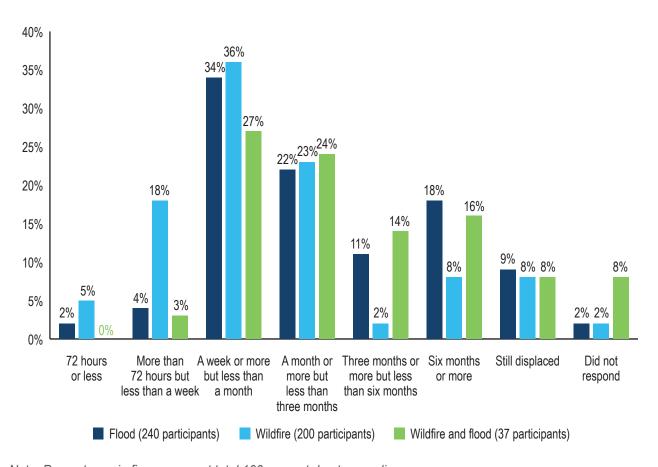
Note: Percentages in figure may not total 100 percent due to rounding.

When we looked at these responses by displacement event, we saw that questionnaire participants who were displaced by the atmospheric river flooding and those displaced by both wildfire and flooding were more likely than those who had been displaced by wildfire to report being displaced for six months or longer –

18 percent of those impacted by flooding and 16 percent of those displaced by both wildfire and floods.

People reported substantial challenges from being displaced, including impacts on health, housing, and employment, and difficulties accessing financial resources or assistance.

Figure 11: Length of time questionnaire participants said they were displaced from their homes, by displacement event



Note: Percentages in figure may not total 100 percent due to rounding

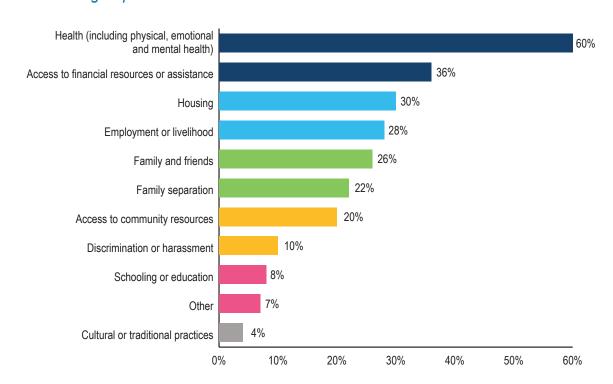


Figure 12: Proportion of questionnaire participants who experienced various challenges as a result of being displaced

Note: Multiple choice question. Percentages in figure may not total 100 percent.

Extended ESS

Thousands of people needed longer-term support after the 2021 events. In its policy and guidance documents, the ministry acknowledges that occasional extensions of support may be necessary to meet evacuee needs. As a result, the ministry can authorize extensions beyond 72 hours. According to the 2010 ESS Field Guide, which was in effect in 2021, extensions could be granted during prolonged evacuations on a case-bycase basis. The 2010 guide further specified that extensions could be granted beyond the duration of an evacuation order in cases where an evacuee was unable to return home because of delays in restoration or health concerns.158

The updated 2022 ESS Program Guide states that ESS can be extended when there is an evacuation order but should not be provided beyond the duration of an evacuation order unless there are "extenuating circumstances." The guide also

states that extensions should not exceed three months and that extensions require significant justification after one month, but it does not discuss what could constitute significant justification. The ministry continues to make such decisions on a case-by-case basis and has discretion to extend ESS supports for both individuals and groups of evacuees. The ministry said it takes many factors into consideration when deciding whether an extension is warranted but did not provide any additional information on its decision-making criteria.

In 2021, EMBC extended ESS support for many households evacuated because of wildfires and flooding. As shown in Figure 6 above, the vast majority of households received ESS for longer than 72 hours. The length of time that households received ESS varied, as shown in Figure 13. The average number of days these households received ESS was 20 days, and the median was 15 days. One household received ESS for 174 days.

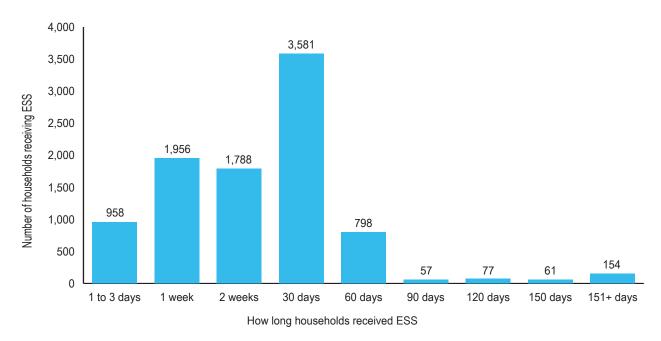


Figure 13: Length of time households received ESS, June to December 2021

Note: Data from ERA tool provided by EMBC.

In accordance with the ESS policy at the time, extensions of ESS beyond 72 hours were evaluated on an individual, case by case basis. ¹⁶⁰ Some questionnaire participants noted the challenge of having to seek extensions of supports so frequently in the beginning:

"The 72-hour renewal process is onerous and stressful. . . I felt like [someone] coming begging every 3 days."

"Funding for our hotel room was cut off after 3 days, and we were told to leave. Six hours after we left, they said it was a mistake and to come back."

"Never knowing when/if supports were ending was continually retraumatizing."

In response to the high number of households that required ESS for extended periods, EMBC began authorizing extensions of ESS to all eligible evacuees through monthly bulletins, instead of making extension decisions on an individual basis. Each of these blanket extensions lasted for three to five weeks at a time.

EMBC issued four blanket extensions to ESS between July and November 2021, for people affected by the wildfires who were still under evacuation order or who had lost their primary residence. The extension bulletins were issued to First Nations and local authority emergency operation centres, ESS directors and reception centres, and specified that ESS responders were permitted to provide further extensions of ESS for food and lodging expenses. The final extension for wildfire evacuees lasted until December 15, 2021.

On November 21, 2021, EMBC issued a bulletin in relation to the atmospheric river that authorized ESS supports to December 15 for those under evacuation order, who had lost their primary residence, or whose primary residence was deemed uninhabitable. The conclusion of ESS supports on December 15, 2021 was significant for many Merritt residents. Our analysis of the ERA data shows that of the 2,545 households evacuated from Merritt that received ESS, 656 households were receiving ESS supports until December 15 and that this decreased to only two households on December 16. This

sharp decrease suggests that approximately 656 households were likely still displaced and in need of assistance at the time ESS ended on December 15, 2021. Many of these households would have been eligible for continuing supports provided by the Canadian Red Cross (CRC).

Extended ESS delivered by the Canadian Red Cross

In the weeks following the atmospheric river, EMBC recognized that the ongoing need for ESS was exceeding the capacity of local ESS teams. In response, EMBC asked CRC to take over the delivery of ESS related to the atmospheric river for six weeks, starting on December 16, 2021. This was formalized in a contribution agreement between the province and CRC. The agreement set out that CRC would provide direct financial assistance to ESS registrants, using the ESS needs assessment criteria and rates from December 16, 2021, until January 31, 2022. 162

CRC's reporting shows that \$9,267,944 provincial dollars were spent by CRC to deliver ESS to 1,448 households between December 16, 2021, and January 31, 2022. Of this, \$3,603,113 was provided directly to evacuees and \$2,865,019 to commercial lodging providers. CRC's reporting shows that program costs were \$1,590,930 and overhead costs were \$1,208,862.

On January 31, 2022, EMBC ended the ESS program for the atmospheric river evacuees. Many affected households then transitioned to other support services provided by CRC. These are described below.

Provision of assistance by the Canadian Red Cross

The CRC also provided other assistance to evacuees following the wildfires and flooding in 2021. Some of this assistance was funded and delivered by the province in partnership

with the CRC. The province entered into contribution agreements with CRC to provide assistance to evacuees.¹⁶⁴

The province partnered with CRC to provide one-time payments to individuals impacted by wildfires and floods. These one-time payments were co-funded by the province and CRC and were distributed by CRC to people who registered with the CRC for assistance. In July 2021, CRC distributed one-time payments to Lyttonarea households impacted by the wildfire (\$2,000) and all other BC households under evacuation order for longer than 10 consecutive days (\$1,200). In August 2021, eligibility for the one-time payments of \$2,000 was extended to people whose primary residence had been severely affected by wildfires, based on structural loss information provided by the ministry. CRC's reporting shows that \$3,349,973 provincial dollars were spent to deliver these one-time payments to people impacted by wildfires. In November 2021, the province partnered with CRC to provide one-time payments to those evacuated due to the atmospheric river flooding (\$2,000). CRC's reporting shows that \$8,885,530 provincial dollars were spent to distribute \$7,204,888 in one-time payments to 7,147 evacuated households.

The province also partnered with CRC to provide assistance for evacuees who needed support after the ESS program concluded. For people impacted by wildfires, this included financial assistance beginning in December 2021 for food, interim housing, 165 debris removal and other immediate needs. CRC's reporting shows that \$1,823,867 provincial dollars were spent as of September 30, 2022, to distribute these additional supports to people impacted by the wildfires. In February 2022, similar additional supports were extended to people still impacted by the flooding. CRC's reporting shows that as of September 30,

2022, \$10,370,598 provincial dollars were spent distributing these additional supports to people impacted by the flooding.

Analysis: Long-term support must be provided fairly

The reality of disasters is that some individuals will experience long-term displacement and require continued support. In 2021, thousands of people affected by both wildfires and floods were out of their homes for far longer than the initial 72 hours of support that ESS provides. Many of these people were unable to turn to other resources, such as insurance, savings, or family and community supports, to provide for their basic needs, as shown by the thousands of households that were still receiving ESS after two, three, four and even five weeks (see Figure 13).

In the wake of the 2021 extreme weather events, EMBC faced challenges in responding to long-term needs and back-to-back emergencies. The province's response to the realities of longer-term displacement resulting from the 2021 extreme weather events was largely ad hoc, relying on a series of individual and then blanket renewals before transitioning service provision to CRC.

While the activities of non-governmental organizations like the CRC are outside of our mandate, CRC has a key position in emergency response in BC, and an examination of its role in 2021 provides important context and raises critical considerations for the delivery of public services such as emergency supports. He deliver public services, especially essential services for evacuees, it must carefully consider the fair delivery of those services.

In our investigation we heard positive recollections of the support provided by CRC. We also heard concerns about communication, accessibility, accountability and transparency. Consistent with our

jurisdiction we considered the ministry's responsibility to promote the fair delivery of public services by third parties.

Communication and access

As part of our questionnaire and in interviews, we heard from people who accessed assistance from the CRC. Some people described CRC supports as helpful, prompt, and easy to access:

"Red Cross has been great and very helpful."

"We were given very good helpful support from ESS and Red Cross."

"We received a great deal of help from Canadian Red Cross and volunteer community organizations."

"The Red Cross and churches were wonderful in assisting."

"Our first Red Cross case worker was very helpful and even met with me in person."

Other people reported not knowing about CRC supports in a timely way or having difficulties accessing them. We heard concerns that CRC supports were not well advertised, that accessing CRC was difficult and confusing, and that wait times for a return telephone call could be long.

In its recovery plan, the Village of Lytton noted that residents had had difficulties contacting CRC. It described a low uptake of CRC case management services and the need to find ways to increase residents' uptake.¹⁶⁷

Questionnaire participants shared information about problems they faced with CRC, including the lack of a dedicated contact person, working with people who were unfamiliar with the local situation, and a lack of information-sharing between CRC and other agencies. One participant provided the following comment relating to when CRC took over delivery of ESS:

"The transition [to CRC] was not well instituted and caused unnecessary stress on evacuees with lack of information and slow responses. Personally, I had four caseworkers with Red Cross after being assured I would have someone consistent.

... I found it stressful to talk to different people all the time who knew little or nothing about me or my community and any challenges there."

Some people told us that because of differences in assessment and rates, they received less financial assistance after transitioning from provincial supports to CRC supports and, in some cases, lost their financial assistance entirely. We did not investigate these cases, but they raise important questions about how the province ensured ongoing access to supports when transitioning important services to a third party.

Oversight and accountability

One of the effects of making CRC responsible for delivering supports to evacuees was that it diminished the province's direct responsibility for and ability to oversee the delivery of those supports. The province created some measures of accountability for the use of public funds by setting out the services it expected CRC to provide in a series of contribution agreements. The contribution agreements also required CRC to report certain information to the province about how the public funds were spent.

However, the agreement with CRC that related to transitioning flood evacuees from ESS to other CRC services after January 31, 2022, did not establish the eligibility criteria or set the rates for financial assistance to be provided to evacuees. Instead, the agreement allowed CRC to determine the amount of financial assistance it provided to people. The ministry told us that this approach would enable CRC to be more

individually and specifically responsive to people's needs. However, the ministry also told us that it had heard both positive and negative accounts of this approach in practice. While individual experiences of these services may vary, we are concerned that the province entrusted significant public funds to a third party for the purpose of supporting evacuees without clearly establishing key program parameters such as eligibility criteria or minimum rates of assistance to be provided to evacuees.

Our concern about accountability was heightened by the limited information sharing between CRC and the ministry. As discussed above, CRC did not initially share information with the ministry about households that it provided services to. This leads to some uncertainty about how the services were provided. For example, we do not know for certain whether the 656 families from Merritt who were receiving ESS supports on the day before the program transitioned to CRC were able to continue receiving supports. While CRC reported broadly that it supported 622 households in Merritt, without further details, the ministry was unable to determine whether households in need received additional supports after the ESS program concluded. This lack of oversight and accountability is concerning since CRC was responsible for administering millions of dollars in public funds on behalf of the province.

Access to a complaints process

When the province contracts the delivery of emergency supports to a third party, it has a responsibility to ensure that people who receive services – and those who are deemed ineligible for services – have access to an adequate and appropriate complaints process. As former Ontario Ombudsman Roberta Jamieson said, "It has become a basic feature of our democracy that people who believe they have been treated unfairly in the provision of public services have the right to complain. . . . [This applies] whether a

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service is rendered by the government itself, or on behalf of government by the private sector."¹⁶⁸

CRC's Client Complaints Procedure permits a recipient of assistance (or their family) to submit a written or verbal complaint. According to the procedure, CRC should acknowledge the complaint and staff are to investigate, take appropriate steps, document the resolution and inform the complainant of it. If the complainant is not satisfied, the matter may be elevated to the executive level for a final decision.¹⁶⁹

Despite the existence of this policy, it is unclear how CRC may have addressed any complaints about its delivery of publicly funded aid following the 2021 events, as this information is not part of the reporting requirements in the contracts between CRC and the province.¹⁷⁰ Similarly, the contracts do not require CRC to report on volunteer and staff training on responding to complaints, nor to what extent information about the complaint procedure is communicated to the public. CRC informed us that volunteers and staff receive information and training in support of the policy, including training in establishing and managing a feedback and complaint process, and that CRC's quality framework includes a client feedback and complaint process. However, it does not appear that people denied access to CRC services are able to complain under the procedure, as it only appears to apply to recipients of assistance.

In contrast to the earlier agreements, the contribution agreement between the ministry and CRC relating to the transition of flood evacuees from ESS to other CRC services provides that any disagreement between a household and CRC about CRC's service delivery could be mediated by the ministry. It is unclear whether and how information about this mediation role was communicated to the people who were receiving CRC supports.

Overall, the ministry's partnerships with CRC in relation to the 2021 events helped to distribute assistance to evacuees and to alleviate the strain experienced by many local ESS teams. However, we found that the ministry did not sufficiently establish measures of accountability and oversight over the CRC's administration of these emergency supports, which were funded to a significant extent through public money.

Finding 4: Emergency Management BC did not establish clear measures of accountability and oversight for the contracted provision of Emergency Support Services, which was an unfair procedure under section 23(1)(a)(v) of the *Ombudsperson Act*.

Recommendation 12: Effective immediately, the Ministry of Emergency Management and Climate Readiness ensure that any future contracts initiated by the province for delivery of Emergency Support Services require a comprehensive reporting back to the province and affected First Nations and local authorities, including information about the households that received emergency supports and the amount and nature of the support provided by the third-party contractor.