Background

The Ministry of Community and Social Services (Ministry) provides a number of community programs and services to help women and their children who are victims of domestic violence find safety and rebuild their lives.

The Ministry provides transfer payments to more than 200 community not-for-profit agencies, which are governed by volunteer boards of directors, to deliver supports and services to abused women and their children. In 2014/15, the Ministry spent $145 million on transfer payments ($142 million in 2012/13), of which $83 million went toward the operation of 96 shelters ($82 million for 95 shelters in 2012/13) and $62 million toward other supportive services ($60 million in 2012/13), including community-based counselling, crisis help lines, and services to help women secure more permanent housing.

During the last decade, Ontario released two action plans to address violence against women: the Domestic Violence Action Plan (2004) and the Sexual Violence Action Plan (2011). As well,
in 2009, the Domestic Violence Advisory Council (Council), created by the Minister Responsible for Women’s Issues, released a report with 45 recommendations for improving the system of services for abused women and their children. The Ontario Women’s Directorate (Directorate) is responsible for co-ordinating the implementation of the action plans and the Council’s recommendations.

In our 2013 Annual Report, we noted that by 2013 we would have expected the government to have assessed whether the 2004 Domestic Violence Action Plan was meeting its objectives of preventing domestic violence and improving supports for abused women and their children. However, the progress reports that have been issued publicly by the Directorate have been mainly anecdotal and have not offered clear updates on the status of the implementation of individual commitments.

Meanwhile, Statistics Canada data on the prevalence of domestic violence before and after the release of the 2004 plan showed some change in Ontario. The percentage of women who reported experiencing spousal abuse decreased from 7% in 1999 to 6.3% in 2009.

Our more significant observations included the following:

- The Ministry did not have the information it needed to identify the unmet demand for services and, in turn, allocate resources to close the gap. For example, in 2011/12, emergency shelters reported that they turned away 15,000 women, or 56% of the women who sought their help. However, this figure overstated unmet demand because the Ministry did not track how many of these women were referred to another agency and received services there.

- Ministry funding to transfer-payment agencies was generally based on what an agency received in previous years, with little or no correlation to identified needs or past performance. As a result, we found significant variations in unit costs among agencies providing similar services. In 2011/12, Ministry-approved annual funding for 10-bed emergency shelters ranged from $334,000 to $624,000, and the agencies’ per-day cost of care ranged from $90 to $575.

- The Ministry’s client satisfaction survey provided limited value because of its low response rate. In addition, no surveys were completed for 20% of agencies and fewer than 10 surveys were completed for another 40%.

- In 2009, an assessment of the condition of shelter buildings identified more than 500 safety and security issues that needed attention. As of March 31, 2012, the Ministry had provided funding for only 10% of those deficiencies and it did not know whether the funded projects had been completed or whether the agencies themselves had paid to fix any of the other problems.

- Despite the recommendations made in our 1994 and 2001 audits of VAW programs and services, the Ministry still has not developed any standards, service directives or guidelines for services provided under VAW funding, such as minimum staffing levels, admission criteria and exit criteria for emergency shelters.

We made a number of recommendations for improvement and received commitments from the Ministry that it would take action to address them.

Standing Committee on Public Accounts

The Standing Committee on Public Accounts (Committee) held a hearing on this audit in November 2014. In March 2015, the Committee tabled a report in the Legislature resulting from this hearing. The Committee endorsed our findings and recommendations, and also issued an additional nine recommendations. The Directorate and the Ministry reported back to the Committee at the end of July 2015. The Committee’s recommendations and the status of the implementation of those recommendations are found in Chapter 7.
The Ontario Women’s Directorate and the Ministry of Community and Social Services provided us with information in the spring and summer of 2014 on the current status of our recommendations. According to the information provided, two of our recommendations have been fully implemented and progress had been made on implementing many of our other recommendations. Little progress was made on about one-quarter of our recommendations. Some of these have to do with the ability to meet demand for services. Specifically, the ministry has no waitlist information for services, and does not know whether women referred elsewhere for services actually received those services. In addition, the Ministry has taken little action to ensure security deficiencies noted in 2009 in shelters which house women who are victims of violence, were actually corrected. According to the Ministry, since transfer-payment agencies are independently run organizations, they are responsible for maintaining their own sites. The Ministry has contracted to undertake building condition assessments over the next five years. Safety and security deficiencies will not be prioritized until all assessments are all completed.

The status of the actions taken on each recommendation is described in the following sections.

**Provincial Initiatives**

**Recommendation 1**

To assess whether the province’s Domestic Violence Action Plan and Sexual Violence Action Plan have reduced domestic and sexual violence and improved supports for women who have experienced violence and their children, the Ontario Women’s Directorate should ensure that the commitments contained within the action plans have measurable goals or targets attached to them and that progress is regularly assessed and reported.

**Status:** In the process of being implemented by early 2016/17.

**Details**

The Ontario Women’s Directorate informed us that it does not plan to produce any further progress reports on the province’s Domestic Violence Action Plan, which was released in 2004 and concluded in 2008.

The province’s Sexual Violence Action Plan was a four-year plan that began in March 2011 and ended in March 2015. Upon completion of the plan, the Ontario Women’s Directorate prepared a chart summarizing commitments made by various ministries, initiatives designed to meet those commitments and their related status and results. We noted that targets had been developed for many of the initiatives and progress was evaluated or would be evaluated by looking at both activity-based and outcome-based measures. For example, under the commitment to develop and deliver training and education programs for service providers and professionals in the community, progress was assessed based on the number of training sessions held and the number of organizations and persons that attended. Progress was also based on the percentage of participants who reported in a survey that, as a result of the training, they were better equipped to identify and support survivors of violence against women. In our view, it would also be helpful to survey the recipients of the services to determine their satisfaction with the services offered and the responsiveness of service providers to their needs. At the time of our follow-up, the latest status update, prepared in April 2015, was for internal purposes only. The Directorate informed us that it had not yet determined when it would post the latest results on their website.

In March 2015, the government launched a new Sexual Violence and Harassment Action Plan, called *It’s Never Okay*. The plan indicates that progress will be monitored through various means, such as, incorporating performance metrics to measure outcomes of plan initiatives; conducting
surveys and polls to measure people’s experiences and changing attitudes relating to sexual violence and harassment; and determining cultural shifts through data analysis.

The Ontario Women’s Directorate informed us that a benchmark attitudinal survey was done in March 2015 to establish existing attitudes at the start of the action plan. Future survey results will be used to measure changes in Ontarian’s attitudes and experiences. At the time of our follow-up, the Ontario Women’s Directorate had convened a working group to develop and implement performance measures, goals and targets by early 2016/17 for initiatives under the new Sexual Violence and Harassment Action Plan. The working group is also expected to assess progress made on the initiatives under the action plan using the soon-to-be established indicators. The Action Plan states that Ontarians will get a progress update on the Plan’s first year anniversary. The Directorate informed us that it has not yet determined the frequency of further public reporting.

Shelter/Housing and Counselling Services for Victims of Domestic Abuse

Recommendation 2
To help ensure that the services provided by transfer-payment agencies to abused women and their children are of an acceptable and reasonably consistent quality standard, the Ministry of Community and Social Services should:

- establish acceptable quality standards for shelter services, particularly with regard to admissions, minimum staffing levels and periodic Canadian Police Information Centre checks for shelter staff; and

Status: In the process of being implemented by mid-2016.

Details
Since our audit, the Ministry has developed a Shelter Standards Manual to provide guidance on the type of policies and procedures shelters need to have in place in six areas: access to shelter services, client rights and responsibilities, program standards, staff and volunteers, health and safety, and service monitoring and evaluation. The Ministry consulted with almost all funded shelters as well as industry experts and incorporated the feedback into the standards where it felt appropriate. The Ministry planned to fully implement the Shelter Standards Manual by mid-2016, and indicated that the 2016/17 service contracts with shelters would outline the requirement to comply with the guidelines.

The Ministry maintains its view that shelters need to be able to carry out their day-to-day operations with flexibility and reasonable autonomy in accordance with regional and demographic demands, while being accountable to their boards of directors and/or chiefs and council and the Ministry. In this regard, the Ministry has not set specific minimum standards, but rather provides guidelines.

For example, included in the access to shelter services standards it is stated that:

- The shelter will have a written procedure that outlines the various reasons for women and dependents transitioning from the shelter.
- When transitioning from the shelter, shelter staff will notify women and dependents that if they need support, they can contact the shelter for additional information and referrals to resources and community services.
- Shelters will have a written policy that outlines the reason women and dependents may be transferred to another shelter.

The Ministry told us that they needed to perform further analysis on staffing, wages and employee-to-bed ratios before they could make a
determination of the level of service that agencies should provide in these areas.

Since our audit, the Ministry has also developed requirements for all Ministry-funded VAW agencies to require a CPIC (police record check for the vulnerable sector) for anyone who comes into unsupervised contact with women and/or their children while performing their duties at the agency, prior to providing services and every three years thereafter. The Ministry expects agencies to be in compliance with this policy by April 2016.

- regularly monitor agencies' performance against standards and take appropriate corrective action if necessary.

Status: In the process of being implemented by mid-2016.

Details
The Ministry recognized the need to strengthen its monitoring of agencies' performance against standards and take appropriate action. In this regard, in March 2015 the Ministry hired three senior program advisors to enhance monitoring efforts in the area of performance management, performance monitoring, data analysis, and development of a program evaluation framework. The Ministry stated that preliminary work on the development of a monitoring tool has begun which will consist of questions to help identify levels of risk related to the standards, drawing from existing mechanisms such as risk assessments and serious occurrence reporting. The Ministry expects to fully implement this recommendation by mid 2016.

Monitoring Service Delivery and Expenditures

Recommendation 3
To better ensure that the quarterly reporting process for transfer-payment agencies providing services to abused women and their children furnishes sufficient information to enable cost-effective monitoring of expenditures and service delivery, the Ministry of Community and Social Services should:

- require transfer-payment agencies to submit only data that is useful for analyzing service costs and gaps in services; and

Status: In the process of being implemented in fiscal 2016/2017.

Details
Agencies funded by the Ministry are required, under their contracts, to submit quarterly reports that compare actual expenditures and service-level data against targeted amounts, and to provide explanations for significant variances.

The Ministry produced revised reporting standards in 2012/13 which included whether individuals were not served because the agency was at capacity, were referred elsewhere for more appropriate services or were waitlisted. Based on an analysis of the 2012/13 and 2013/14 data, the Ministry noted inconsistencies in how data was being reported by agencies. Since this time, the Ministry has further revised the data to be submitted from transfer-payment agencies. For example, in 2013/14 the reporting of the number of individuals served under the Transitional and Housing Support Program was changed so that dependents are no longer counted. This better reflects the households/families served. The Ministry informed us that it is also considering how to revise the calculations of occupancy rates at shelters, and how to capture information needed to determine whether women referred elsewhere received services. The Ministry expects any further changes to be incorporated into their reporting standards for 2016/17.

- develop procedures, such as periodic spot checks of submitted data, to ensure that data reported by transfer-payment agencies is accurate, consistent and reasonable.
Status: In the process of being implemented by March 2016.

Details
In November 2014, the Ministry approved implementation of a Data Integrity Framework for its information system which collects financial, service, and staffing-related data for the transfer-payment agencies. The Framework includes the introduction of common tools for the regional offices to verify data anomalies. It contains a report which identifies missing data and significant variances against targets, and a summary report to provide a quick view at the regional program level to identify any problems with data quality. The staff then have the ability to drill down to the agency level to isolate the problem. The framework also establishes a quarterly regional data attestation requirement and provides training for regional staff on data entry, updates and the use of tools.

At the time of our follow-up, two regional offices had received training on the use of the Data Integrity Framework, and the Ministry indicated that it planned to complete training for the remaining regional offices by the end of November 2015.

The Ministry also informed us that it undertook a pilot in March and April 2014 to spot check data submitted by transfer-payment agencies (of which only one was a VAW agency). Staff in the North Region who conducted the pilot are expected to share the pilot’s findings and best practices with other Ministry staff. The Ministry informed us that it intends to apply the findings from the pilot to the development of a province-wide reporting approach. The Ministry informed us that this recommendation will be fully implemented by March 2016.

Monitoring Quality of Services Provided

Recommendation 4
To ensure that the services being provided to abused women and their children are meeting their needs and are delivered in a safe and secure environment, the Ministry of Community and Social Services should:

- consider ways to increase the response rate on the client satisfaction survey, and analyze results by the nature of the service being provided;

  Status: Fully Implemented.

Details
The voluntary client satisfaction survey aims to assess whether the programs have increased women’s safety, well-being and sense of empowerment, and improved the accessibility and responsiveness of VAW services. At the time of our audit, we reported that the response rate of the client survey was as low as 4% and respondents did not answer every question on the survey.

To address this, the Ministry analyzed the response rate of all questions contained in the previous survey and eliminated or revised those questions that had a low response rate. The Ministry also requested agencies to rate the importance of each question in the previous survey and eliminated those questions that were rated low in importance. Finally, the Ministry consulted with stakeholders to gather input on the content of the revised survey to ensure the questions were relevant and easily understood.

To try to increase the overall response rate of the survey, the Ministry encouraged agencies to develop an incentive program for women who complete the survey. The Ministry directed agencies to use the $2,100, provided to them annually for administering the survey, to fund incentives. Agencies will be required to report back to the Ministry on any incentive programs they have implemented.

The revised survey was shortened to 19 from 39 questions and now allows women to indicate what services they received from the agency, giving them an opportunity to rate their level of satisfaction with each service. Overall, the redesigned survey focuses more on client outcomes, satisfaction with individual services and wait times for services received. The Ministry has also told us it provides
each agency with ‘real-time’ access to the survey results for their agency with the expectation that agencies will be using the data to analyze the responses to determine how to improve upon their services.

According to the 2014/15 provincial summary of survey results, almost 5,900 surveys were completed compared to 3,200 in 2011/12.

- require agencies to periodically submit their program evaluations for ministry review, and subsequently ensure that areas requiring attention are corrected and best practices are shared with other service providers; and
  
  Status: Little or no progress.

Details
At the time of our follow-up, the Ministry informed us that it had requested all VAW agencies to submit any program-related evaluations conducted (analysis, reports, presentations, exit interview summaries, formal program evaluations, evidence of board review of results, etc.). The Ministry stated that it expects its regional offices to review the evaluations by the end of June 2016.

- implement a plan for correcting significant safety and security deficiencies identified in the Ministry’s 2009 Building Condition Assessment.

  Status: Little or no progress.

Details
According to the Ministry, since transfer-payment agencies are independently run organizations, they are responsible for maintaining their own sites. The Ministry has signed a contract with a vendor to complete Building Condition Assessments of all transfer-payment agency sites over the next five years, including VAW sites. Agencies can use this information to support their request for capital funding from the government. Once assessments are completed in 2020, the Ministry, in consultation with the sector, expects to analyze Building Condition Assessment data along with program information, to prioritize physical safety, fire code and security work, as part of broader VAW program needs.

Meeting Demand for Services

Recommendation 5
To better ensure that the service needs of abused women and their children are met, the Ministry of Community and Social Services should:

- require agencies to maintain wait-list information for their services; and

  Status: Little or no progress.

Details
In our 2013 audit we reported that the Ministry lacked the information needed to identify the unmet demand for services and, in turn, allocate the appropriate resources to close the service gap.

Although the Ministry revised its reporting standards for transfer-payment agencies since our 2013 audit, and now requires agencies to report the number of women placed on a waitlist during the reporting period, it does not ask for waitlist information at a particular point in time. Therefore, demand is unknown.

- review the feasibility of implementing a system to determine whether women who are eligible for VAW services but must be referred elsewhere by an agency, because of capacity issues, actually receive the needed services.

  Status: Little or no progress.

Details
In October 2014, the Ministry analyzed whether the data it was collecting from agencies was adequate to help it assess whether the demand for VAW services was being met. The Ministry’s analysis found that there were several limitations with the available data. Specifically, the data did not provide the Ministry with a unique count of women waiting for service or the length of time a woman was
waiting for service. As well, the data collected did not provide insight into whether women referred elsewhere actually received services.

At the time of our follow-up, the Ministry informed us that it was assessing the feasibility of a pilot project to collect information about whether women referred elsewhere received services without contacting the women directly. The Ministry indicated that it was assessing ways to collect high quality data without jeopardizing the safety and security of women seeking services. The Ministry also informed us that if its assessment indicates the pilot project is feasible, it expects to implement a data collection plan early in the 2017/18 fiscal year.

**Funding**

**Recommendation 6**

_to ensure that funding provided to transfer-payment agencies is commensurate with the value of services provided to abused women and their children and is properly allocated to meet the demand for these services across the province, the Ministry of Community and Social Services should periodically compare and analyze agency costs for similar services across the province, investigate significant variances that seem unjustified, and ensure that funding is based on the trend in actual service levels provided._

**Status:** In the process of being implemented by March 2016.

**Details**

At the time of our audit, we found that, although transfer-payment agencies were required to submit an annual budget to secure funding for the following year, the funding allocation was generally historically based with little or no correlation to identified needs or past performance. At that time, the Ministry had not done an analysis to determine whether resources were properly allocated across the province to meet the demand for VAW services.

In January 2015, the Ministry completed an analysis of 2012/13 and 2013/14 year-end service and financial data reported by the agencies. The analysis examined regional and agency differences in unit costs for four key ministry-funded VAW programs (i.e., Emergency Shelter Services, Counselling Services, Child Witness Program, and Transitional and Housing Support Program). Similar to our audit findings in 2013, the analysis completed by the Ministry found there was a great deal of variability in unit costs (e.g. cost per individual, per bed, per hour of service, depending on the service) for all four VAW programs.

The Ministry is also in the process of finalizing the development of a business intelligence dashboard that will allow for data analysis and comparisons across agencies, programs, and regions. The dashboard will consolidate financial and service program data by various levels (agencies/program/region) and provide the ability to perform comparisons (for example, against a provincial ‘average’, year-over-year or similar regions/entities). The Ministry feels this will enable the users to more easily identify trends and monitor key program metrics (expenditures, service targets) which it expects will lead to improved monitoring and reporting. The Ministry has told us it has yet to resolve some technical issues and improve user experience, but once completed the dashboard will be made available for use by regional and corporate staff.

The analysis being completed and the implementation of the dashboard as a tool to examine trends and compare results across agencies, programs and regions is an effective first step in addressing the recommendation. However, the Ministry has informed us that no processes to address issues identified in service levels and related funding have been developed. Its expectation is to complete this in early 2016.

**Co-ordination**

**Recommendation 7**

_to help improve the co-ordination of service delivery for abused women and their children, the Ministry of Community and Social Services (Ministry) should:
• ensure that regional offices undertake effective strategic service planning with agencies and that the results support the Ministry’s overall goals and priorities; and

Status: In the process of being implemented by April 2016.

Details
The Ministry requires its five regional offices to conduct strategic service planning and coordinate regional service delivery. This involves bringing Ministry-funded VAW agencies together to discuss service issues, best practices, emerging issues and regional priorities. However, our 2013 audit found that the degree of strategic planning taking place varied at all three regional offices examined.

At the time of our follow-up, the Ministry had drafted a VAW Strategic Plan in which regional coordination was identified as a key pillar. However, the plan did not yet include specifics of proposed actions or outcomes for coordination. The Ministry shared the strategic plan with regional offices and VAW agencies in fall 2015 and is currently reviewing the feedback received to incorporate it into guidelines for regional offices.

The Ministry undertook a scan of the current state of planning conducted in its various regions to enable it to develop regional office guidelines for engagement, involvement, and feedback; determine how regional offices will deal with VAW agencies in a consistent manner; and ensure that regional offices’ local planning are consistent with Ministry priorities. The Ministry informed us that the results of the scan revealed that while each region has developed distinct VAW service planning processes, commonalities were present, including: removing barriers to service delivery; building collaboration between VAW service providers and; sharing best practices to address challenges and ensure consistency in the implementation of service changes and initiatives. The Ministry has organized a working group on regional service system planning to assist with the development of guidelines and the integration of service planning into all 2016/17 VAW agency contracts.

The Ministry expected to hold consultations beginning in mid-2015 to seek input on improvements to regional planning and develop guidelines by the end of the year for implementation in early 2016.

• use the annual reports of the Domestic Violence Community Coordinating Committees, and the committees set up to manage the collaboration agreements between Children’s Aid Societies and VAW agencies, as well as the Transitional and Housing Support Program referral agreements to:
  • summarize the useful information;
  • share the opportunities for service improvements and useful research identified; and
  • take corrective action on common issues identified.

Status: In the process of being implemented by March 2016.

Details
In our 2013 audit we found that the Ministry was not analyzing information submitted by the various committees that were set up to co-ordinate service activity in order to identify best practices and inform program decision making. These included:

• Domestic Violence Community Coordinating Committees aimed at strengthening linkages and networks among community agencies for the purposes of improving community response to abused women, increase awareness and prevention, and identify and address gaps in VAW services;

• Committees set up to manage collaboration agreements between VAW service providers and Children’s Aid Societies (CAS) to provide local protocols between CAS and VAW agencies (both shelters and counselling agencies) to identify the situations when the two sectors must involve each other and what actions should be taken by each; and
Committees set up to manage referral agreements between the Transitional and Housing Support Program service providers and social housing service providers. All Transitional and Housing Support Program providers are expected to have agreements with local Social Housing Co-ordinated Access Centres to help abused women find social housing.

At the time of our audit, the Ministry had completed a summary report of Domestic Violence Community Coordinating Committees’ annual reports which was distributed to regional directors and to the committees for their information. The Ministry informed us that it also completed a provincial summary based on 2014/15 annual reports and plans to distribute it among regional offices and the committees to facilitate the sharing of best practices across the committees.

The Ministry also updated the year-end reporting template to be completed by the CAS/VAW collaboration agreement committees to include a report back on outcomes which had not previously been requested. It then completed a summary report based on the 2012/13 CAS/VAW reports which lists a number of initiatives introduced as a result of information reported by the committees. For example, further outreach to the aboriginal community around the issue of native children and child welfare. The summary report for the 2013/14 year is expected to be released by the end of 2015. The Ministry has also announced it provided one-time total funding of $200,000 in 2014/15 to CAS/VAW collaboration committees to address identified training needs.

In regard to Transitional and Housing Support Program annual reports, the Ministry informed us that it planned to roll up information from all the annual reports submitted to regional offices for fiscal 2012/13, 2013/14 and 2014/15. The information would then be distributed to regional staff and collaboration committees by the end of fiscal 2015/16. At that point the Ministry informed us it would also assess the need for continued reporting or recommendations for improvements.

Performance Reporting and Overall Effectiveness

Recommendation 8

To assess how effective the Ministry of Community and Social Services (Ministry) has been in achieving its objectives for Violence Against Women programs and services, the Ministry should:

- establish performance measures for its objective of enhancing the co-ordination of services, as well as targets for all established performance measures, and regularly report results related to those measures; and

**Status:** In the process of being implemented by April 2016.

Details

At the time of our audit, although the Ministry had performance measures in place (with the exception of measures on the co-ordination of VAW services), it had not established targets or benchmarks or routinely reported results related to them.

To begin to address the concerns the audit raised, the Ministry has updated its program goals to include “to improve the coordination of services at the community level” and added the corresponding outcome that, “women receive services that are accessible and responsive to their needs.”

The Ministry intends to use the 2014/15 results from the revised VAW satisfaction survey and input from regional consultations with partner agencies to facilitate the development of VAW outcomes and a performance measurement framework, including targets, by early 2016.

The Ministry also informed us that although it currently releases a provincial summary report of its client satisfaction survey, which includes results related to three of its performance measures, it plans to implement a regular reporting cycle for all performance measures, beginning in fiscal 2016/17.

- liaise with Statistics Canada to obtain responses to the biennial Transition Home Survey, by province, and compare pertinent results for
Ontario to past performance and to results in other jurisdictions.

Status: Fully implemented.

Details
At the time of our audit, we noted that every other year for approximately 20 years Statistics Canada had been surveying all residential facilities that provide services to abused women and their children across Canada and collecting information both on the services provided and on the clientele. In our view, a number of the survey questions and answers would provide useful information to the Ministry.

The Ministry has fully implemented our recommendation to obtain and use responses to Statistics Canada’s biennial Transition Home Survey. Specifically, the Ministry has obtained provincial-level data from the Statistics Canada survey dating back to 2005/06. The Ministry informed us that they had reviewed the data and completed an analysis that compares results for Ontario to past performance and to results in other jurisdictions, but had not yet prepared a report of its findings. The Ministry expects the survey will aid in providing examples of other data that can be collected from service providers to inform the development of performance measures and to support program and policy decision-making, particularly as it relates to performance measurement.

Further to this, the Ministry completed a review of various reports, including academic articles, data, and reports available through Statistics Canada to enhance its understanding of violence against women and to understand the prevalence, characteristics, and risk factors associated with this violence. The majority of the information gathered for the literature review focused on Canadian jurisdictions.