

ADMINISTRATION RESPONSE - ENFORCEMENT SUPPORT SERVICES

RECOMMENDATION

That the October 21, 2022, Community Services report CS01460, be received for information.

Requested Council Action	Information only		
ConnectEdmonton's Guiding Principle	ConnectEdmonton Strategic Goals		
CONNECTED This unifies our work as we achieve our strategic goals.	Healthy City		
City Plan Values	ACCESS		
City Plan Big City Move(s)	n/a	Relationship to Council's Strategic Priorities	Conditions of service success
Corporate Business Plan	Serving Edmontonians		
Council Policy, Program or Project Relationships	<ul style="list-style-type: none"> • Bylaw 13145 - Animal Licensing and Control Bylaw • Bylaw 20002 - Business License • Bylaw 14600 - Community Standards • Bylaw 8353 - Conduct of Transit Passengers • Bylaw 2202 - Parkland Bylaw • Bylaw 14614 - Public Places Bylaw • Bylaw 5590 - Traffic Bylaw • Bylaw 12800 - Zoning Bylaw • Bylaw 17400 - Vehicle For Hire • Bylaw 18590 - Waste Services Bylaw • Community Safety and Well-Being • Transit Safety • Infill 		
Related Council Discussions	<ul style="list-style-type: none"> • Community Safety and Well-Being • 2023 to 2026 Budget 		

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Executive Summary

- In 2022, the Office of the City Auditor undertook its audit of enforcement support services with the goal of determining if the City of Edmonton:
 - developed guiding documents to support consistent enforcement activities
 - managed enforcement staffing resources to meet expected service levels
 - has information systems to support operational needs
- The Auditor identified a number of key findings and made three recommendations:
 1. fully develop service objective performance measures and targets and evaluate them to assess if the program is achieving its objectives
 2. update enforcement policies and procedures to reflect current practices
 3. increase the functionality of their dispatch and Global Positioning System (GPS) system to support officer safety
- Administration accepts all of the recommendations and is planning to address the recommendations raised by June 28, 2024.

REPORT

Background

The Community Standards and Neighbourhoods Branch (the Branch) is the lead of the Bylaw and Provincial Act enforcement service for the City of Edmonton. In order to provide these services to Edmontonians and visitors to the city, enforcement officers must have appointments related to their role from the Government of Alberta and the City of Edmonton. For the day-to-day work of Branch employees, there are at least 13 City bylaws, four Provincial Regulations, 11 Provincial Acts and some limited arrest powers under federal legislation. Administration's programs and services have non-uniformed and uniformed officers who have different roles in working with Edmontonians on understanding bylaws, encouraging lawful behaviour in public spaces and, once all other options are exhausted, taking enforcement action. The enforcement landscape can be adjusted rapidly due to changing demands, most recently demonstrated during the COVID-19 pandemic.

Audit Overview

In 2022, the Office of the City Auditor undertook an audit of the City's enforcement support services to determine if the Branch:

- developed guiding documents to support consistent enforcement activities.
- managed enforcement staffing resources to meet expected service levels.
- has information systems to support operational needs.

The auditor identified a number of key findings:

- The Branch has action plans that identify four service objectives and priorities. However, not all service objectives have performance measures and targets. Additionally, the Branch does not have fully developed measures or targets and is not evaluating the results.

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- The Branch has established policies and procedures for service objectives and priorities. However, some of the Branch's standard operating procedures have not been updated for a few years and some of the standard operating procedures do not reflect staff members' understanding or current practices.
- The Branch has information systems that support operational needs. The Branch monitored and tracked officers regularly. However, the GPS system was not functional for the testing period and it has not been fully functioned since 2020.

Overview of Recommendations and Management Response

The Office of the City Auditor presented three recommendations in its report. Administration accepts all of the recommendations.

Recommendation 1: Fully develop service objective performance measures and targets and evaluate them to assess if the program is achieving its objectives

Administration recognizes the importance of having service-related measures and targets in place, along with robust evaluation to determine whether the program is achieving its objectives. Addressing this recommendation must acknowledge the larger infrastructure of Enterprise Performance Management and the upcoming Enterprise Commons implementation. This effort must also undertake considerations for the changing expectation on the enforcement profession and be aligned with the future of the profession. Over the past several years, the performance goals and expected outcomes for the Transit Peace Officers has shifted significantly from enforcement-driven with examples of key performance indicators such as number of tickets issued, to more nuanced public safety and compliance-driven proactive work. The City's enforcement practice is now led by the "4 E's" of Engage, Educate, Encourage, and, as a last resort, Enforce. Administration is adapting enforcement key performance indicators to reflect that shift.

The delivery of the developed performance measures, targets and evaluation plan will be completed in two phases as a corporate effort to review and improve current performance measures is ongoing.

Implementation Dates:

- By March 31, 2023
 - Develop performance measures in alignment with Administration's Enterprise Performance Measurement framework for the remaining service objective, Safety and Security on the Transit System.
 - Research and evaluate possible performance measures and targets for all four branch objectives:
 - Safety and Security on the Transit System
 - Problem Properties Initiative
 - Homeless Encampment Response
 - Animal Welfare Service
- By June 30, 2023
 - Finalize branch service objective performance measurements and targets.
 - Design a process to regularly evaluate, assess service objectives and inform decision-making as part of Administration's overall Enterprise Performance

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Management program.

Recommendation 2: Update enforcement policies and procedures to reflect current practices.

Administration recognizes that having up-to-date policies, procedures, standards and guidelines in place provides clarity to frontline teams and management. The goal with enforcement services is that all Edmontonians feel safe within their communities, visitors view being in Edmonton as safe, as well as, when required, that the legislation is applied effectively, equitably and with a trauma-informed approach.

Over the last five years, enforcement support services have taken on new files with few additional resources including, but not limited to: *Animal Protection Act* enforcement, vehicle noise enforcement, COVID-19 response, odours, encampment response, and rental e-scooters and e-bikes. Responding to calls for service and adding services has been prioritized and has therefore impacted timely updates to policies, procedures, standards and guidelines.

Updated policies, procedures, standards and guidelines will be completed in three phases to reach a level of maturity that reflects the needs of Edmontonians and effectively consolidates, updates and modernizes thousands of pages of direction for employees.

Implementation Dates:

- By March 30, 2023
 - Create an inventory of current policies, procedures, standards and guidelines and prioritize review urgency
 - Implement accountability procedure for employee awareness and acknowledgement of new documentation and changes to policies, procedures, standards and guidelines
- By November 30, 2023
 - Determine gaps in policies, procedures, standards and guidelines
 - Develop documentation to address the gaps
 - Update existing documentation to align with practice
- By June 28, 2024
 - Review and update all inventoried documents with additional sections on GBA+, Indigenous Framework implementation, and trauma-informed aspects

Recommendation 3: We recommend that the Community Standards and Neighbourhood Branch implement a fully functional dispatch and GPS system.

Administration recognizes the need to address employee safety effectively. In enforcement services, it is imperative to understand the status of officers in the field as situations can change, de-escalate, escalate or require assistance. Dispatch systems and teams are critical to officer safety and support in the field. There is an opportunity to use dispatch systems to better coordinate the activities of peace officers and municipal enforcement officers -- this would be a similar approach to what is already in place for transit peace officers. Having a proper dispatch and GPS tracking system would align the Branch with other first responder and emergency services groups, such as Edmonton Fire

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Rescue Services or the Edmonton Police Service. In an effort to address this challenge, an unfunded Computer Aided Dispatch service package is currently being evaluated through budget processes. In an effort to address this recommendation and move co-located dispatch forward, an unfunded service package is currently being evaluated through the priority based budgeting and business technology investment request processes.

Implementation Date: If the unfunded service package is funded during budget deliberations, the implementation is possible by December 29, 2023.

Budget/Financial Implications

City of Edmonton enforcement services are primarily funded through the tax-levy. In order to support the implementation of the three recommendations outlined above, Administration has identified the following requirements:

- Recommendation 1 - No financial impact - the development of service objective performance measures and targets can be completed with existing resources.
- Recommendation 2 - In order to update and maintain policies, procedures, standards and guideline documents, it will require one ongoing policy analyst Full Time Equivalent at a cost of \$110,000 annually to complete the work then maintain documentation surrounding current practices and research findings. The position will also be responsible for creating community connections and gathering information to inform updates. Administration is prioritizing this work within existing resources but may need to return to Council in the future with a supplementary budget adjustment to fund an additional FTE if the use of existing resources proves unsustainable.
- Recommendation 3 - \$2 million to upgrade the dispatch and GPS systems. As noted above, a capital profile is currently being evaluated through the priority based budgeting and business technology investment request processes as a growth project with high ranking (mandate and safety), and will be proposed for funding as a part of the 2023-2026 capital budget.

COMMUNITY INSIGHT

Community insight for this report was not conducted. However, Administration has heard from community members in different ways on their experience with enforcement services including, but not limited to:

- the public hearings in 2020 related to community safety
- Transit safety and security speakers
- Social media
- 311 inquiries
- Professional standards complaints and commendations
- Informal engagement between frontline staff and community members
- Trauma-informed training that included Indigenous perspectives, explanations of vicarious trauma, and opportunities for discussion on different experiences

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These learnings are incorporated into the continuous improvement of enforcement services and will also inform the implementation of these audit recommendations.

GBA+

Enforcement services impact all Edmontonians and visitors. As the personnel who implement the enforcement continuum and are trusted with use of force, it is important that when considering this service, the framing of the system is “safety for who?” and “safety from what?” Social norms regarding the habits, behaviours, and attitudes considered safe, orderly, and appropriate, as well as the structures and responsibilities for enforcement, vary across generations, cultures, and identities.

Enforcement practices have tended to prioritize the norms and perspectives of those with social, racial, and class privilege, who often look to enforcement agencies to manage complex social and mental health problems. This results in the overenforcement of Indigenous and racialized peoples, people experiencing poverty, and those who are unsheltered or precariously housed. The prioritization of particular norms in enforcement practices also manifests in an enforcement workforce that lacks the diversity necessary to be reflective of the communities it serves. It is important that enforcement hiring, practices and policies be revised with such considerations in mind to support inclusive, equitable and safe service.

Administration is dedicated to continuous improvement towards equity, inclusion, and safety for all, recognizing that it is a journey of modernizing over a hundred years of law enforcement practices.

Administration has taken multiple steps to implement equity in enforcement services practices but recognize the journey is ongoing. Now, with slowly increasing predictability as the pandemic proceeds, and tasking for different services being examined more closely, the opportunity to refine internal practices to be more equitable and inclusive, address officer safety and measure ourselves to a standard that the community can appreciate will be undertaken with focuses on transparency and community input.

Equity measures and mitigation within the enforcement services line of business include:

- Hiring subject matter experts in policy analysis with equity and Indigenous focuses.
- Development of a Branch Development and Professional Standards Team - this team has been funded through the Community Safety and Well-Being work and will provide clear standards of practice across the branch, complete a review of training expectations, and provide community opportunities with process creation and updates. Additional, ongoing resources will support this team in implementing equity, diversity, and inclusion and the Indigenous Framework.
- Updates to branch policies and practices will use research-based and data-driven concepts that include:
 - Gender Based Analysis Plus (GBA+)
 - Reconciliation
 - Anti-racism
 - Anti-oppression
 - Trauma Informed Practices
 - Community safety and wellness

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- Community development
- Place-based deployment
- Updates to branch practices will include:
 - Regular story-sharing and reporting to Edmontonians in an equitable, inclusive and trauma-informed way
 - Evaluate potential alternatives to enforcement and educate community on findings
 - Identify systemic inequities and propose bylaw modernization and changes to City Council
 - Integrating the Community Safety and Well-being Framework into branch work
 - Engage with Edmontonians and advisory groups to evaluate customer experience
 - Increase work with advisory groups and community partners on service delivery and customer/lived experiences
 - Leverage community knowledge, expertise and perspectives in service design and in advising City Council
 - Training and education opportunities
- Identify barriers and opportunities within enforcement hiring practices:
 - Incorporate the City's Guide for Inclusive Hiring
 - Audit branch hiring and promotional processes, as well employee practices and policies
 - Report how barriers are addressed
 - Audits are regularly undertaken
 - Evaluation and assessment of education required for roles
- Develop active recruitment practices and partnerships from historically under-considered groups
 - Attend and engage with community organizations to recruit a representation of Edmontonian to branch positions and roles
- Entered into the 30x30 Initiative to advance people who present or identify as women in the enforcement complement by having 30 per cent representation by 2030.