

**OFFICE OF
THE CITY AUDITOR**

Report
**ENFORCEMENT
SERVICES
MANAGEMENT AND
SUPPORT AUDIT**

October 3, 2022

Project Summary

BACKGROUND

The *Municipal Government Act* provides Edmonton's City Council the authority to create bylaws. City Administration enforces these bylaws and other applicable legislation through Peace Officers and Municipal Enforcement Officers. Enforcement services include engagement, education, warnings, inspections, tickets, issuing court orders, executing search warrants, and engaging in other enforcement services. The key outcome of enforcement is to achieve individual and community compliance with bylaws and laws and ensure public safety.

Enforcement is a core function of the Community Standards and Neighbourhoods Branch (Branch). In 2022, 62 percent (\$28 million) of the Branch's budgeted expenditures were allocated to enforcement services.

The Branch is responsible for managing staff, designing and implementing policies and procedures, and to have reliable information systems to support enforcement services.

AUDIT OBJECTIVES & SCOPE¹

To determine if the Branch:

1. Developed guiding documents to support consistent enforcement services
2. Managed enforcement staffing resources to meet expected service levels
3. Has information systems to support operational needs

We focused on the management and support of enforcement services. We did not evaluate the efficiency and effectiveness of enforcement services such as issuing warnings and tickets.

WHAT WE FOUND

The Branch has action plans that identified four service objectives and priorities - transit safety, animal welfare,

¹ We conducted this engagement in conformance with the Institute of Internal Auditors' *International Standards for the Professional Practice of Internal Auditing*.

homeless encampment and problem properties. However, not all service objectives have performance measures and targets. We also found that where the Branch does have performance measures, it did not have fully developed measures, or targets and is not evaluating the results.

The Branch has established policies and procedures for their service objectives and priorities. They also identified training requirements and are tracking training completion for enforcement officers. However, a couple of the Branch's standard operating procedures have not been updated for a few years. We also found that some of the standard operating procedures do not reflect staff members' understanding or the current practice.

The Branch also has information systems that support their operational needs. The Branch monitored and tracked officers regularly. However, the GPS system it uses to track officers is not working well, as officer locations are inaccurate and the system is not loading, and users have challenges logging in.

RECOMMENDATIONS

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| Recommendation 1 | We recommend that the Community Standards and Neighbourhoods Branch fully develop service objective performance measures and targets and evaluate if the program is achieving its objectives. |
| Recommendation 2 | We recommend that the Community Standards and Neighbourhood Branch update enforcement policies and procedures to reflect current practices, resources, and priorities. |
| Recommendation 3 | We recommend that the Community Standards and Neighbourhoods Branch implement a fully functional dispatch and GPS system. |

WHY THIS IS IMPORTANT

Performance measurement and evaluation can help the Branch

identify opportunities for improvement and assess program effectiveness. Updated policies and procedures may better guide consistent enforcement services. Lastly, improving the functionality of dispatch and GPS systems may enhance officer safety.

Enforcement Services Details

Enforcement services include engagement, education, warnings, inspections, issuing tickets, issuing court orders, and executing search warrants. The key outcome of enforcement is to achieve individual and community compliance with bylaws, laws, and ensure public safety.

BRANCH STRUCTURE

Enforcement is a core function of the Community Standards and Neighbourhoods Branch (Branch). The mandate of the Branch is to enhance “safe properties and a civil urban society that meets the standards and expectations of communities.” In 2022, 62 percent (\$28 million) of the Branch’s budgeted expenditures were allocated to enforcement services.



The Branch is responsible for managing staff including Community Standard Peace Officers and Municipal Enforcement Officers, designing and implementing policies and procedures, and to have reliable information systems to support enforcement services.

**COMMUNITY STANDARD
PEACE OFFICERS**

Community standards peace officers (123 FTEs) primarily ensure the safe use and enjoyment of public and private property. This team includes:

- Animal care and control officers (31 FTEs) - protect and ensure animals' and pets' welfare within the city.
- Vehicle for hire (5 FTEs) - regulates taxi, transportation network vehicle, limousines, etc.
- Commercial vehicle unit (5 FTEs) - regulates commercial vehicles.
- Churchill team (14 FTEs) - patrols City hall, Churchill square and the downtown core.
- General duty peace officers (12 FTEs)
- Park rangers (17 FTEs) - preservation and maintenance of open spaces, and parkland. This team includes the wildlife and encampment teams.
- Transit peace officers (36 FTE) - helps maintain safety on transit including buses, LRT, and transit stations. The Edmonton Transit Services Branch transferred transit peace officers to the Branch in 2018 to consolidate enforcement city resources, and improve consistency and oversight in enforcement practices. Edmonton Transit Services retains ownership of the overall transit safety strategy.

**MUNICIPAL ENFORCEMENT
OFFICERS**

Municipal enforcement officers (32 FTEs) work with citizens and businesses by enforcing bylaws related to:

- Garbage storage - ensuring garbage is properly stored on property.
- Problem properties - addressing high-risk properties that have a detrimental impact to the surrounding area, including but not limited to nuisance conditions, noise violations, land use infractions, property deterioration, safety issues associated with development of property.
- Snow removal - maintenance of sidewalks by property owners related to snow and ice.

- Signs - the location, size, and maximum number, and design of temporary signs on private property.
- Weeds - weeds control by patrolling the city for weeds, and responding to citizen complaints related to weeds.
- Maintenance of buildings - responding to complaints and investigates buildings with nuisance conditions.

Recommendation 1: Performance Measures

RECOMMENDATION

We recommend that the Community Standards and Neighbourhoods Branch fully develop service objective performance measures and targets and evaluate them to assess if the program is achieving its objectives.

KEY FINDINGS

The Branch has four service objectives and priorities (service objectives) related to enforcement services. They have performance measures for three of the service objectives. However, the Branch does not have performance measures for one of their service objectives.

The Branch also has not set targets for any of the performance measures and is not consistently evaluating their results.

PERFORMANCE MEASURES

The Branch's service objectives related to enforcement services are:

- Safety and Security on the Transit System
- Problem Properties Initiative
- Homeless Encampment Response
- Animal Welfare Service

The Branch has performance measures for three of the four objectives. However, it does not have performance measures for the Safety and Security on the Transit System objective. The Branch acquired the transit peace officers from the Edmonton Transit Services Branch in 2018. During the audit, there were no measures relating to the Safety and Security on the Transit System service objective.

The City's Enterprise Performance Management framework indicates that good practice is to identify measures for each specific process under an objective. The measures should

reflect what matters in achieving the service objective and support effective decision making and effective business management.

Through research, we have identified examples of performance measures for safety and security on the transit system from other cities such as:

- Average safety ratings of Calgary Transit Services (Calgary)
- Crime rate on transit system per 100,000 customer trips (Ottawa)

TARGETS

We did not find documented performance measure targets for any of the Branch's objectives. Targets are important because they determine how data is understood and define performance expectations. Targets are typically based on current baseline data, industry standards that are required or defined, or desired results.

Below are examples of potential performance measures and targets for some of the Branch's service objectives and priorities. We provided these to inform management as it develops future measures:

- Problem Properties Initiative - number of clean-ups per 100 problem property inspections.
- Animal Welfare Service - percent of monthly capacity used for cats and dogs.

Setting a target and comparing results with the target can help identify trends and the Branch can respond to these trends.

EVALUATION

Branch management has access to performance measure results on a dashboard. They use this information to respond to media inquiries and for statistics in Council reports. However, management does not consistently evaluate the performance measure results and use them to make decisions.

The City's Enterprise Performance Management framework indicates that analyzing results provides contextual information around the result to support decision making. The framework also suggests management ask a few key questions when they are evaluating the results of performance measure:

- What caused the results?
- What is the impact of this performance to our service both now and into the future if this performance were to continue?
- Now what should we do?

WHY THIS IS IMPORTANT

Performance measures and targets help business areas make data-based decisions and identify opportunities for improvement.

RECOMMENDATION 1 MANAGEMENT RESPONSE

Branch fully develop service objective performance measures and targets and evaluate if the program is achieving its objectives.



Responsible Party

Branch Manager, Community Standards and Neighbourhoods



Accepted by Management

Management Response

In order to comply with this recommendation, Administration will:

- Develop performance measures in alignment with Administration's Enterprise Performance Measurement framework for the remaining service objective .

- Research and evaluate possible performance measures and targets for all four branch objectives.
 - March 31, 2023
- Finalize branch service objective performance measurements and targets.
- Design a process to regularly evaluate, assess service objectives and inform decisions as part of Administration's overall Enterprise Performance Management program.
 - June 30, 2023

**Implementation Date**

June 30, 2023

Recommendation 2: Policies and Procedures

RECOMMENDATION

We recommend that the Community Standards and Neighbourhoods Branch update enforcement related policies and procedures to reflect current practices, resources, and priorities.

KEY FINDINGS

The Branch has policies and procedures for all its service objectives and enforcement priorities. However, not all policies and procedures are kept up-to-date. For example, the Transit Policy and Procedure Manual has not been updated for eight years.

Some policies and procedures do not reflect current enforcement practices such as:

- Transit peace officers have limited knowledge of the objectives and operational performance measures it contains which can potentially lead to enforcement practices that do not align with desired outcomes.
- The Standard Operating Procedures for the animal protection team establishes a minimum number of pet store inspections, but the team performed fewer inspections than required by the internal procedures.

TRANSIT POLICY AND PROCEDURE MANUAL

The Edmonton Transit System Branch originally created the Transit Policy and Procedure Manual in 2005 and last updated it in 2014. This manual was not updated when the City reassigned the transit peace officers to the Branch. The transit peace officers still use this manual as guidance for their enforcement activities. It includes information such as goals, member conduct, and operational procedures.

Some examples of discrepancies between what is in the Transit

Policy and Procedure Manual and the transit peace officer's understanding of certain topics are:

- Clear objectives for transit peace officers including: mission, vision, goals - objectives are included in the manual, however 75 percent of the transit peace officers we interviewed provided inconsistent responses that did not align with the stated objectives.
- Performance indicators and standards for transit peace officers such as:
 - Expertise and knowledge
 - Appraising and responding to situations
 - Community service and public relations

These indicators and standards are included in the Manual. However, all the transit peace officers we interviewed indicated that there are no performance indicators and standards.

If transit peace officers do not fully understand the objectives, and performance indicators and standards of the section it can potentially lead to undesired outcomes.

PET STORE INSPECTIONS

The standard operating procedures for the animal protection team requires officers to conduct routine inspections of all pet stores once a month, with additional visits if further complaints are received. The Branch completed only 36 percent of the inspections required by the standard operating procedures in 2020 and 2021.

The team indicated that the majority of pet stores are franchised and required to follow corporate standards which are in compliance with the Branch's inspection requirements. They also indicated that their time was allocated towards higher priority activities such as calls related to injured, sick, or neglected animals instead of conducting pet store inspections.

The Branch needs to update the operating procedures to be consistent with the current approach. The outdated operating

procedures currently do not provide consistent direction for decision-making and guidance for day-to-day operations.

WHY THIS IS IMPORTANT

Clear, up-to-date policies and procedures provide consistency and clarity on how an organization operates.

RECOMMENDATION 2 MANAGEMENT RESPONSE

Update enforcement related policies and procedures to reflect current practices, resources, and priorities.



Responsible Party

Branch Manager, Community Standards and Neighbourhoods



Accepted

Management Response

In order to comply with this recommendation, Administration will:

- 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
 - March 30, 2023
- Determine gaps in policies, procedures, standards and guidelines
- Develop documentation to address the gaps
- Update existing documentation to align

with practice

- November 30, 2023
- Review and update all inventoried documents with additional sections on GBA+, Indigenous Framework implementation, and trauma-informed aspects.
 - June 28, 2024



Implementation Date

June 28, 2024

Recommendation 3: Officer Safety Check-ins

RECOMMENDATION

We recommend that the Community Standards and Neighbourhoods Branch implement a fully functional dispatch and GPS system.

KEY FINDINGS

To support the safety of peace officers, peace officers are required to use their radio or phone to check in hourly with dispatch staff and to have a working GPS app on their phone that locates where they are at all times. However, the GPS system has had technical issues, such as officer locations not moving, program not loading due to login challenges. The GPS reliability issues have been happening since 2020.

GPS SYSTEM

The Branch's dispatch team performs hourly safety check-ins with peace officers as part of the overall safety program. The check-in has two components:

1. Dispatch will contact officers via radio or phone to confirm that they are safe
2. Dispatch confirms that an officer can be located using GPS

The dispatch team documents these hourly safety check-ins using tracking sheets.

We tested peace officer (excluding transit peace officers) check-ins for the month of January 2022 and confirmed that the Branch's dispatch only confirmed 1 percent of the GPS check-ins. Management indicated that since 2020, the Branch has been having issues with the GPS systems, such as the location did not move with the officer, officers were unable to login to the system, and the program would not load.

There are several benefits of reliable GPS systems for enforcement staff:

- **Reliable geo-location:** enhances calls for backup support in an event of an emergency as the dispatcher can pinpoint the location that help is needed.
- **Real-time location technology:** allows dispatchers to identify the closest officer when a high priority call is received. This can improve response times.
- **Passive and historical tracking:** the data provides accurate and objective records that shows where an officer was located at any given time. This could help identify trends in call types and potential problem areas where resources are deployed more often.

In May 2022, the Branch stopped using the existing GPS system and temporarily moved to using Google Maps to locate their officers via cellphone GPS. We observed dispatch's ability to track officers through Google Maps and this was documented in the tracking sheets for July 2022.

WHY THIS IS IMPORTANT

Having a fully functional dispatch and GPS system helps keep officers safe in an event of an emergency and can help the Branch make data-based decisions in their deployment strategy.

RECOMMENDATION 3 MANAGEMENT RESPONSE

Implement a fully functional dispatch and GPS system.



Responsible Party

Branch Manager, Community Standards and Neighbourhoods



Accepted

Management Response

In order to comply with this recommendation, Administration will:

- Bring forward an unfunded service package for the 2023 to 2026 budget cycle for Council's deliberation.



Implementation Date

(If approved) December 29, 2023

ACKNOWLEDGEMENT

We would like to thank the staff and management of the Community Standards Branch for their cooperation during the audit.