COUNCIL REPORT

Edmonton

EDMONTON ENFORCEMENT STAFFING (A. KNACK)

ACHIEVING COMPLIANCE THROUGH ENGAGING, EDUCATING, ENCOURAGING AND ENFORCING

Recommendation

That the December 4, 2023, Community Services report CS02050, be received for information.

Requested Action	Information only		
ConnectEdmonton's Guiding Principle	**ConnectEdmonton Strategic Goals**		
CONNECTED This unifies our work to achieve our strategic goals.	**Healthy City** **Urban Places** **Regional Prosperity**		
City Plan Values	LIVE.		
City Plan Big City Move(s)	Inclusive and compassionate A rebuildable city A community of communities	**Relationship to Council's Strategic Priorities**	Community safety and well-being Conditions for service success
Corporate Business Plan	Serving Edmontonians		
Council Policy, Program or Project Relationships	● Downtown Vibrancy Strategy ● Chinatown Recovery ● Transit Safety Plan ● Healthy Streets Operations Centre ● Community Safety and Well-Being Strategy		
Related Council Discussions	● October 9, 2018, City Operations report CR_6489, Transit Safety and Security ● June 15, 2021, Urban Planning and Economy report UPE00565, Downtown Vibrancy Strategy ● February 22, 2022, Office of the City Manager report OCM01037, Transit Safety and Security ● May 24, 2022, Office of the City Manager report OCM00991, Community Safety and Well-being Strategy		

8.1
ROUTING - Community and Public Services Committee | DELEGATION - J. Flaman, D. Jones, T. Pawlyk
December 4, 2023 – Community Services CS02050

1

- May 24, 2022, Office of the City Manager report OCM01300, Intergovernmental Update - Verbal report
- July 4, 2022, Community Services report CS01345, Healthy Streets Operation Centre - Chinatown
- August 15, 2022, Community Services report CS01345, Healthy Streets Operation Centre - Chinatown
- August 15, 2022, Office of the City Manager report OCM01390, Healthy Streets Operations Centre - Update - Verbal report

Previous Council/Committee Action

At the August 28, 2023, Community and Public Services Committee meeting, Councillor A. Knack made the following inquiry:

Can Administration provide a report with the following information:

1. The present staffing levels for all enforcement staff, excluding the Edmonton Police Service (for instance, Municipal Enforcement Officers, Development Compliance, etc.)?
2. A comparison of staffing levels between Edmonton and Calgary?
3. What are the recommended staffing levels for each function to facilitate genuine proactive patrols throughout the city?

Executive Summary

- The City of Edmonton employs the use of proactive compliance activities to varying degrees; however, not all teams are appropriate for a proactive approach.
- Administration worked with colleagues in Calgary to compare staffing levels for compliance functions. Administration is able to address this topic in private, if needed, subject to Sections 21 (disclosure harmful to intergovernmental relations) and 24 (advice from officials) of the *Freedom of Information and Protection of Privacy Act*.
- Administration identified opportunities for staffing level adjustments to allow for proactive enforcement, specifically in the river valley and parkland system, the public transit network, snow and ice control, and potentially in recreation centres and libraries.
- As parking enforcement and automated enforcement are currently provided by contract services, those enforcement activities were considered out of scope for this report.

REPORT

Two different areas within Administration provide compliance services for the City of Edmonton. The Community Standards and Neighbourhoods branch leads community peace officers and municipal enforcement officers, while the Development Services branch leads development compliance officers and safety codes officers. Each role has the authority to enforce City bylaws and permit regulations, with some roles provided authority under provincial acts (*Safety Codes Act, Traffic Safety Act*, etc.), and some roles provided authority under federal legislation.

Administration uses a proactive approach to achieve compliance to varying degrees across the organization, depending on capacity and appropriateness of the technique. The City of Edmonton uses an escalating process of the 4Es (engage, educate, encourage and enforce). When reaching

the enforcement stage, the City of Edmonton teams use three categories of proactive enforcement; place-based, problem-oriented and community-based[1].

Many City of Edmonton teams perform their compliance function through a mix of both proactive and reactive work (Attachment 1). Administration's capacity to offer proactive enforcement services depends largely on the intersection of public demand (complaints, calls for service and competing operational priorities) and the staffing levels of the respective team. Methods employed also consider the appropriateness of proactive practices, the potential outcomes and how best to accomplish the goals of The City Plan.

Current State

Development Services Branch

Development Services offers a number of inspection teams. Some of the teams are largely complaint based (Zoning Bylaw, Compliance, Infill), with the remainder being largely proactive (Development Permit Inspections, Landscaping Inspections and Lot Grading Inspections). Safety Codes Inspections are both complaint based and proactive (where a permit has been applied for).. The teams are funded through two different models - tax levy funding for compliance based teams and the Planning and Development Business Model for proactive, permit related teams.

Development Services teams use a variety of tools to inspect, including relying on fee-based inspections as part of the development process, complaint-based inspections, and participating in partner led enforcement teams, such as the problem properties team. In all cases of 'proactive enforcement' there is an application for development that directs work. The associated compliance work is then undertaken to confirm that the development has met, or is in the process of meeting, the requirements of the various bylaws/codes.

Development Services has 50 FTEs connected to compliance functions.

Community Standards and Neighbourhoods Branch

The Community Standards and Neighbourhood Branch tracks the activity of its compliance resources within the categories of complaint initiated and officer initiated. Work that is complaint initiated is considered responsive as the issue has already occurred, and the community has asked the City of Edmonton to respond and address the issue. Officer initiated work is considered proactive as it is either interrupting unreported inappropriate behaviour or conducting proactive work to deter inappropriate behaviour.

Many of the cross-disciplinary teams formed in the past two years have been designed intentionally in alignment with a proactive approach in mind, including:

- the Transit Community Action Team (TCAT),
- the Community Outreach Transit Team (COTT),
- the Healthy Streets Operation Centre (HSOC) Community Safety Teams and
- some of the new Animal Control teams.

---

[1] National Academies of Sciences, Engineering, and Medicine. 2018. *Proactive Policing: Effects on Crime and Communities*. Washington, DC: The National Academies Press. https://doi.org/10.17226/24928.

EDMONTON ENFORCEMENT STAFFING - ACHIEVING COMPLIANCE THROUGH ENGAGING, EDUCATING, ENCOURAGING AND ENFORCING (A. KNACK)

These new teams join many of the existing peace officer resources already conducting proactive work to varying degrees.

Whilst a proactive approach is effective in controlling and deterring unwanted or illegal behaviour, there are some teams whose work will remain largely reactive due to its nature. For example, the *Animal Protection Act* team responds to and investigates behaviour that compromises the health and safety of animals in Edmonton. As this behaviour largely happens inside private residences, it is difficult to conduct any proactive work on this file outside of their regulatory inspections in pet stores, vet clinics and other animal care facilities.

At times, proactive work can be hampered by external factors. As an example, TCAT was originally designed to have a team of two transit peace officers assigned to two transit locations for the purpose of highly visible proactive patrols and proactive enforcement activities in those locations. Because of the complexities of this type of enforcement, TCACT shifted its approach and conducts highly visible proactive patrols in larger teams — this reduces the number of locations in which they are able to provide a proactive enforcement response.

Community Standards and Neighbourhoods has 322 FTEs connected to compliance functions.

Comparison to Calgary

Calgary and Edmonton take similar approaches to their compliance functions, without including a comparison of their respective police organizations. Both cities employ community peace officers under the provincial peace officer program. There are, however, a number of distinct differences between the two groups. Administration is prepared to discuss this in more detail in private.

Opportunities and Optimal staffing levels

Development Services Branch (not including Business Licensing or Vehicle for Hire)

Many of the Development Services teams are undertaking internally led service reviews to identify potential opportunities to better align resources to shifting priorities or to take on new techniques, such as using aerial photos, and will be advancing any necessary funding requests as needed. The level of resources required is dependent on how priorities are set. It is likely that fewer additional resources would be required if compliance outcomes are focused on City Plan goals versus achieving faster service levels. This is because there would be a prioritization of files to be inspected, rather than treating all files as equal. Additional considerations include the input of Edmontonians, most recently expressed through the Zoning Bylaw 20001 Public Hearing, and their expectations for compliance outcomes. Further information - specifically as it relates to infill development will be provided in Q2 2024 as part of UPE01993, Construction Site Safety and Accountability - Impact Assessment.

The internally led service reviews may identify optimal staffing levels to identify potential opportunities to better align resources or to take on new techniques, therefore no recommendations for staffing levels are available at this time. These service reviews are outside of the scope and timeline of this report. Any requests for new staffing will be advanced once this work is completed and in the appropriate manner for the funding source of the team.

Community Standards and Neighbourhoods Branch

Administration analyzed workload data to inform the information provided in this report. However, system constraints limited the workload analysis that could be conducted. Currently, enforcement data is tracked across multiple systems which vary by specific teams; as a result, collecting and analyzing workload data is both cumbersome and resource-intensive. More informative comparisons may be able to be conducted in the future as Computer Aided Dispatch (CAD) is implemented across more enforcement areas within the next year. Current workload data indicates officers generally spend a significant proportion of their time responding to calls/complaints unless they are part of a specialized unit established to focus on more proactive work, such as the Transit Community Action Team, Vehicle-For-Hire or the Healthy Streets Operation Centre Community Safety Teams.

Optimal staffing levels would enable City of Edmonton resources to provide genuine proactive compliance presence for the following priority areas and activities:

- Transit safety, including transit centres, LRT stations, on LRT trains and on buses
- River valley and parkland
- Locations with significant need for intervention in collaboration with other teams (such as the current Healthy Streets Operation Centre pilot project)
- Snow and ice on sidewalks
- Off-leash dog parks
- Recreation centres and libraries
- Vehicle noise enforcement

New resources assigned to the animal control peace officer team would offer the ability to increase the proactive nature of the team overseeing dog parks. Proactive activities for the snow and ice on sidewalks, as well as the City's river valley, parkland and transit system continue to be lower than past numbers and optimal ratios. Additionally, the Healthy Streets Operation Centre Community Safety Teams are currently funded until the end of the pilot project (December 2024).

Optimal ratios for proactive to reactive efforts tend to be situational and, within law enforcement agencies, different teams tend to take on different levels of proactive duties within their assignments. A 50/50 assignment ratio of proactive to call-driven response work may be optimal, with flexibility integrated into an assignment model.[2]

Community Standards and Neighbourhoods started an organizational and service provision review to reexamine the way in which Administration delivers proactive services. With the continued increase of complaints driving intervention activities, any significant changes in proactive delivery in some of the largest bodies of work (snow and ice control, transit, parkland) without any additional staffing resources would need to be paired with either service reductions

---

[2] Sherman, L. W. (2019). Targeting, testing, and tracking: the Cambridge Assignment Management system of evidence based police assignment. In R. J. Mitchell & L. Huey (Eds.), *Evidence Based Policing: An Introduction* (pp. 15–27). essay, Policy Press.

or extending delivery response times. Using the priority areas and activities listed above, Attachment 2 outlines details on opportunities for additional proactive work.

Community Insight

Community insight is provided by examining 311 complaints and overall demand for compliance services provided by the City of Edmonton. Service demands are up significantly in the past six years. Some of that demand is with high-volume bylaw complaints addressed by municipal enforcement officers and some are the drawn-out investigations coordinated by the problem properties initiative team. Demand on the park ranger team, encampment team, municipal enforcement officer teams and transit safety team is up significantly since 2018, reducing the time available for proactive presence in the river valley and park system, as well as throughout the transit network (Attachment 1).

GBA+

The City of Edmonton's compliance activities support multiple lines of service. Breaches of compliance impact Edmontonians in a variety of ways based on their unique diversity factors. For instance, accumulated snow and unshoveled sidewalks disproportionately impact those with mobility and balance issues. At the same time, Administration is also aware that breaches of compliance can occur for a variety of reasons (for instance, a resident may be unable to clear their walkway due to their own mobility issues and requires a referral to additional supports), and the four E approach to achieving compliance (engaging, educating, encouraging and enforcing) allows teams to apply the appropriate tools to achieve both immediate results and the long-term behavioural change to achieve the goals of The City Plan.

Attachments

1. City of Edmonton Proactive Enforcement Data
2. Proactive Enforcement Opportunities