



Office of the Auditor General

**Audit of By-law and Regulatory Services –
By-law Enforcement**

**Tabled at Audit Committee
November 24, 2020**



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Acknowledgements

The team responsible for this audit, comprised of Chantal Amyot and Louise Proulx from the Office of the Auditor General (OAG) and BDO Canada LLP, under the supervision of Ed Miner, Deputy Auditor General and the direction of Ken Hughes, Auditor General, would like to thank those individuals who contributed to this project, and particularly, those who provided insights and comments as part of this audit.

Original signed by:

Auditor General

Executive summary

Purpose

The Audit of By-law and Regulatory Services – By-law Enforcement examined the effectiveness of processes and practices in place to support the delivery of consistent and efficient by-law enforcement activities. This included an examination of enforcement procedures and service standards, technology improvement projects, selected service requests and enforcement activities, as well as processes and practices related to training, health and safety, and time reporting. The Audit of By-law and Regulatory Services – By-law Enforcement was included in the 2019 Audit Work Plan of the Office of the Auditor General (OAG), approved by Council on April 24, 2019.

Background and rationale

The City's by-laws are enforced by By-law & Regulatory Services (BLRS), a service area within the Emergency & Protective Services Department. BLRS is responsible for the enforcement and administration of approximately 40 municipal by-laws and 6 Provincial Acts within the City of Ottawa that address a wide range of municipal community issues, including: parking, animal care, property standards, graffiti, fences, business and lottery licensing, smoke-free areas, as well as use and care of roads, parks and other facilities.

Except for parking, enforcement is based largely on a reactive approach, primarily in response to requests for service made to the City's 3-1-1 service centre. The enforcement officer responds to the call/complaint and takes the necessary action to enforce compliance with by-laws as required. City Councillors and their staff also submit service requests directly to BLRS management via phone or email.

A priority level is assigned by the dispatcher based on the nature of the call. Based on the 2018 Annual Report¹, BLRS responded to 87,056 requests for service in 2018. This represents a 2.1% average annual increase in requests for service since 2011, including an increase of 8% in 2018.

¹ Due to COVID-19 and the declared municipal emergency, BLRS' 2019 annual report was not available by the end of our audit fieldwork. Management plans to combine it with 2020 and present in 2021.

Since by-law enforcement officers are expected to enforce some 40 municipal by-laws and respond to an increasing number of requests for service within set service standards, it was important to examine whether there are effective processes and practices in place to support consistent and efficient delivery of enforcement activities. The audit did not examine parking and licensing enforcement activities.

Findings

The key findings associated with the audit's objectives are as follows:

- 1. Enforcement procedures and service standards:** We found that BLRS has developed Standard Operating Procedures (SOPs) that provide enforcement and other instructions to by-law enforcement officers. The SOPs cover most of the activities that officers enforce daily. BLRS also has developed service standards which set target times to initially respond to a service request (i.e. contacting the person or organization making the request) and to resolve it. However, the service standards are not systematically included in the SOPs. Out of the 91 identified SOPs, 12 SOPs (13%) do not contain the applicable service standards for initial response, and none of 91 SOPs contain the service standard for resolving the request.
- 2. Monitoring performance against procedures and service standards:** We found that BLRS management monitors the performance of enforcement activities against service standards by preparing and reviewing monthly performance reports. However, we found that there is no set process in place and no clear expectations for supervisors in terms of how they should be using these reports to manage officers' performance. In addition, these performance reports do not provide sufficient information to assess whether by-law and property standards officers are enforcing in accordance with BLRS' operational procedures and service standards. As a result, supervisors do not use these reports to monitor the performance of enforcement activities.
- 3. Enforcement Activities in Response to Service Requests:** We reviewed a random selection of 30 service requests as well as 24 enforcement activities at two selected locations to assess whether service requests were responded to consistently and in accordance with procedures and service standards. When we compared enforcement actions taken to SOPs, we found that actions taken complied with operational procedures in 27 of the 30 reviewed cases (90%). When we looked at compliance against service standards, we found that the

initial response and resolution targets were met in 25 of the 30 reviewed cases (83%). This rate exceeds the 80% target set by BLRS management. Our review of enforcement activities at the two selected locations found seven times where progressive enforcement options were not applied (29%), and six times (25%) where the initial response and/or resolution took longer than the service standards.

4. **Management of technology risks:** We reviewed two technology projects that were initiated by BLRS to improve the effectiveness and efficiency of dispatch and service request management activities: Dispatch Modernization Project and a Client Relationship Management System Project. We found that BLRS successfully completed Phase 1 of the Dispatch Modernization Project by implementing GPS technology in all 84 by-law enforcement vehicles. However, Phase 2 of the project, which aims at using the GPS data to improve dispatch activities by assigning enforcement cases based on the officers' location, has been put on hold by BLRS management. Without implementation of Phase 2, BLRS will not achieve the intended benefits of its investment in the GPS technology. As for the Client Relationship Management System Project, we found that BLRS implemented the system in parking enforcement but has yet to define requirements to implement the system in by-law enforcement. As a result, once again the intended benefits, such as fuel cost savings, service optimization and improved client satisfaction, were not achieved.
5. **Identification of training needs:** We found that BLRS developed training manuals in 2016 for new by-law enforcement officers, as well as a series of health and safety training modules on various topics, such as the handling of wild animals and dangerous dogs. While training materials exist and are being used to deliver training to officers, we found that BLRS management does not have a formal and documented process to identify training requirements and develop and update training material. We also found that BLRS does not develop and maintain training plans for enforcement officers.
6. **Delivery of training:** We found that enforcement training is delivered to new by-law enforcement officers through a combination of classroom instruction, online learning, and ride-alongs. New by-law enforcement officers also go through a formal coaching program where experienced officers walk them through a series of modules and scenarios to prepare them to go into the field. However, we found that that BLRS does not keep complete training

attendance records and does not have a monitoring process to ensure that all required enforcement training has been taken.

Conclusion

Overall, the audit found that the City has effective processes and practices in place related to by-law enforcement activities. There are policies, procedures, and service standards in place to support consistent delivery of enforcement activities. In addition, selected enforcement activities that we reviewed were generally performed in compliance with these policies, procedures, and service standards. However, we did identify opportunities to improve the consistency and efficiency of by-law enforcement activities.

Recommendations and responses

Recommendation #1

That the City develop a strategy to update, communicate and reinforce to enforcement staff its initial response and resolution service standards on an ongoing basis.

Management response:

Management agrees with this recommendation.

Service standards are reviewed on a monthly basis and Supervisors are provided with a list of Officers with open cases exceeding 30 days for resolution. Response and resolution targets will be added to the SOPs and will continue to be communicated to Officers. It should be noted that some types of service requests, such as zoning or property standards, can take longer than 30 days to resolve due to the Order to Comply and Notice of Violation processes, which are subject to legislated timelines and the potential for appeals. This work will be completed by the end of Q2 2021.

Recommendation #2

That the City define expectations for performance monitoring of enforcement activities, including use of performance reports.

Management response:

Management agrees with this recommendation.

While BLRS has performance reporting and other monitoring mechanisms in place, BLRS will establish and implement a formal process to define expectations for performance monitoring of enforcement activities. This will include scheduled reviews of performance reports and GPS data that will be documented and provided to Supervisors routinely. This work will be completed by the end of Q4 2021.

Recommendation #3

That the City implement its proposed GPS data retention plan.

Management response:

Management agrees with this recommendation and it has been implemented. GPS data is available and can be accessed by Management daily in a live application for one year and in accordance with the retention plan described in this audit report.

Recommendation #4

That the City develop and implement a plan to improve ongoing communication of SOPs and service standards to by-law officers and monitor the impact of the plan on service delivery.

Management response:

Management agrees with this recommendation.

BLRS will develop and implement a plan to improve ongoing communication of SOPs and service standards to By-law Officers and will monitor the impact of the plan on service delivery. There is currently a process in place where Supervisors review SOPs and track those reviews with their staff; however, BLRS will formalize this process into a documented plan. This work will be completed by the end of Q4 2021.

Recommendation #5

That the City develop a strategy to improve the timeliness of by-law enforcement including leveraging the use of technology to improve the efficiency of operations.

Management response:

Management agrees with this recommendation, and it has been implemented.

Leveraging technology to improve the timeliness of by-law enforcement is a priority for BLRS. Understanding that this work is on-going and will develop further as technology evolves and becomes available, BLRS has ensured that documents comprised in the City's existing project management framework contain a requirement for a scan and analysis of the available technologies to improve service delivery and efficiency of operations. This scan will be required for all significant projects internal to BLRS going forward, including the Dispatch Modernization Project and MAP replacement CRM. Once implemented, these projects will improve the timeliness of by-law enforcement.

Recommendation #6

That the City define its project requirements for implementation of the next phase of the Dispatch Modernization Project so that the planned efficiency of service delivery is achieved.

Management response:

Management agrees with this recommendation.

The Dispatch Modernization Project is currently underway. Work is being done by the Project Management Office and BLRS to finalize the current-state and future-state documentation, at which point the project requirements can be defined. This work will be completed by the end of Q2 2021.

Recommendation #7

That the City define its requirements and implement the CRM project within by-law enforcement should the expected benefits still warrant the investment.

Management response:

Management agrees with this recommendation.

This agile project is currently underway, with its requirements already established and defined, as an enterprise solution to replace the current MAP program. This project is expected to be completed in Q4 2022.

Recommendation #8

That the City establish a formal process for developing and updating enforcement and health and safety training curriculums.

Management response:

Management agrees with this recommendation.

Prior to January 2020, training was part of a larger portfolio that included Logistics and management of projects. Since that time, BLRS has established a resource responsible for training as part of their portfolio. Duties include: the review of training needs (Corporate and BLRS-specific), the coordination of delivery, and the maintenance of staff training records on an on-going basis. BLRS will establish a formal process to review and update training materials at pre-determined intervals as well as developing a formal training plan and curriculum. This work will be completed by the end of Q4 2021.

Recommendation #9

That the City maintain complete lists of required training, and records of courses and training taken by officers.

Management response:

Management agrees with this recommendation.

Further to the response provided for Recommendation 8, as part of the proposed training plan and curriculum, all records related to courses and training completed by BLRS staff is currently being inputted into the corporate employee enterprise software (SAP). This work will be completed by the end of Q2 2021.

Detailed audit report

Introduction

The Audit of By-law and Regulatory Services – By-law Enforcement was included in the 2019 Audit Work Plan of the Office of the Auditor General (OAG), approved by Council on April 24, 2019.

Background and context

The City's by-laws are enforced by By-law & Regulatory Services (BLRS), a service area within the Emergency & Protective Services (EPS) Department. BLRS is responsible for the enforcement and administration of approximately 40 municipal by-laws, as well as 6 Provincial Acts within the City of Ottawa.

The mandate of BLRS is to protect and serve residents, businesses and visitors through education on, and administration and enforcement of, regulations that address public health and safety, nuisance control and consumer protection. It is responsible for ensuring compliance with city-wide regulatory by-laws and provincial legislation that address a wide range of municipal community issues that relate to parking, animals, property standards, and other matters such as graffiti, fences, business and lottery licensing, smoke-free areas, use and care of roads, and parks and facilities. Except for parking, enforcement is based largely on a reactive approach primarily in response to requests for service made to the City's 3-1-1 service centre.

BLRS also coordinates and administers a number of ongoing City functions and programs including the Spay/Neuter Clinic, Property Standards and License Appeals Committee, Animal Control Tribunal and the Large Wild Mammal Emergency Response Protocol. It is also responsible for administering the Municipal Animal Shelter Services Agreement with the Ottawa Humane Society and 21 cost-recovery agreements with licensed private parking enforcement agencies.

Organizational structure

In 2017, the City hired KPMG to conduct a service review of BLRS to assess its service delivery model and identify improvements to by-law enforcement, administration and policy development. BLRS was realigned in July 2018 as a result of this service review. It established three primary units that report to the Director's office: By-law Enforcement Branch, Operational Support and Regulatory Services, and the Parking and Licensing

Enforcement Branch. As well, a separate Public Policy Development Branch within EPS was established and several positions from BLRS moved into that new unit.²

By-law Enforcement Branch

The By-law Enforcement Branch is responsible for general by-law enforcement including animal care and control, noise, parks, property standards and maintenance, municipal smoke-free regulations, and zoning. In Q4 2019, the By-law Enforcement Branch had 71 full time equivalents (FTEs), organized in two geographical regions (east and west). Officers in this branch work under five supervisors and are responsible for responding to requests for service citywide seven days per week from 6 a.m. to 2 a.m. with extended hours to 4 a.m. on Saturday and Sunday mornings.

Most enforcement activities are initiated by a request for service through 3-1-1, which is dispatched to an officer. The officer responds to the call/complaint and takes the necessary action to ensure compliance with by-laws as required. In addition, councillors and their staff also submit service requests directly to BLRS management via phone or email. Based on our discussions with BLRS staff, requests from Councillors makes up a significant portion of the BLRS managers' and supervisors' workload with some spending 20-25% of their time handling such requests.

This BLRS branch is the primary, but not sole focus of this audit as other groups are also involved in by-law enforcement.

Operational Support and Regulatory Services Branch

The Operational Support and Regulatory Services Branch coordinates and administers programs including the Spay/Neuter Clinic, the Property Standards and License Appeals Committee and the Animal Control Tribunal. It also administers the Municipal Animal Shelter Services Agreement with the Ottawa Humane Society and 21 private parking enforcement agency agreements. As of Q4 2019, Operational Support and Regulatory Services Branch had 20 FTEs.

This branch is also responsible for dispatching requests to by-law officers and coordinating the training of officers. All types of requests for service related to by-laws are funnelled through the Dispatch unit. This includes parking, generalist and property standards requests.

² In February 2020, subsequent to our audit, the organizational structure changed again.

Amongst other duties, this branch is also responsible for the knowledge base articles that are used by 3-1-1 agents and it administers the Alternate Response Program. The Alternate Response Program responds to some types of complaints by issuing warning letters for the first complaint rather than sending a by-law officer to investigate the matter.

Parking and Licensing Enforcement Branch

The mandate of the branch is to facilitate traffic flow by enforcing parking rules and administering licences³. In Q4 2019, Parking and Licensing Enforcement Branch had 84 FTEs. Parking enforcement is a combination of proactive measures to support public safety, improve traffic flow and facilitate turnover for businesses by enforcing parking rules as well as reactive measures responding to requests for services (complaints from citizens).

The Licensing Counter issues various types of business licences, including specialized ones that are not available at the City's client service centres such as tobacco vendors and snowplow contractors.

In addition to responding to requests for service and issuing licences and permits, this branch conducts its own inspections and audits.

Service demand

Based on the 2018 Annual Report⁴, BLRS has averaged a 2.1% annual increase in requests for service since 2011, however with an increase of 8% in 2018. Table 1 illustrates volumes over time.

³ In February 2020, subsequent to our audit, the two units were reorganized into two distinct branches.

⁴ Due to COVID-19 and the declared municipal emergency, BLRS' 2019 annual report was not available by the end of our audit fieldwork. Management plans to combine it with 2020 and present in 2021.

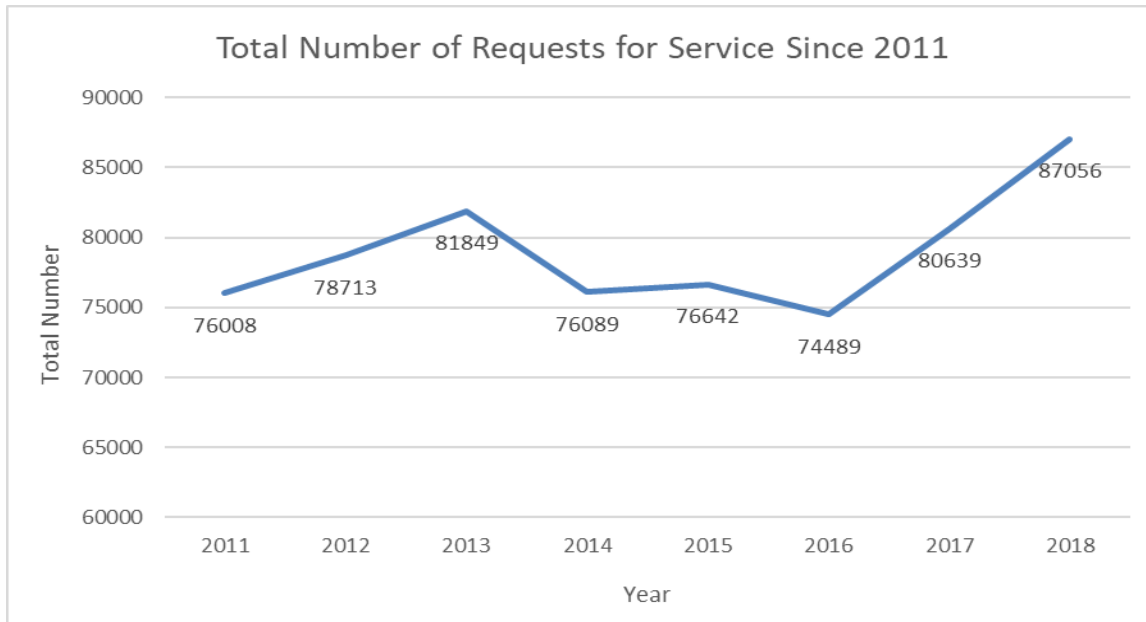


Figure 1: Number of BLRS requests for service

As illustrated in the chart above, in 2018, BLRS responded to 87,056 requests for service. The increase in service requests in 2018 is in part attributed to animal transport services which previously were handled by the Ottawa Humane Society. In addition, there has been an increase in service requests related to noise complaints which used to be handled by the Ottawa Police Service up until 2016. These figures also include requests received from Councillors’ offices that warrant the creation of a Service Request. The vast majority of the requests for service (93%) are handled by By-law Enforcement Branch staff. The remaining 7% are handled by the Operational Support and Regulatory Services Branch through the Alternate Response Program.

In 2018, the By-law Enforcement Branch responded to more than 49,500 requests for service (almost 60% of all requests for service). These requests, broken down by type, are illustrated in the chart below:

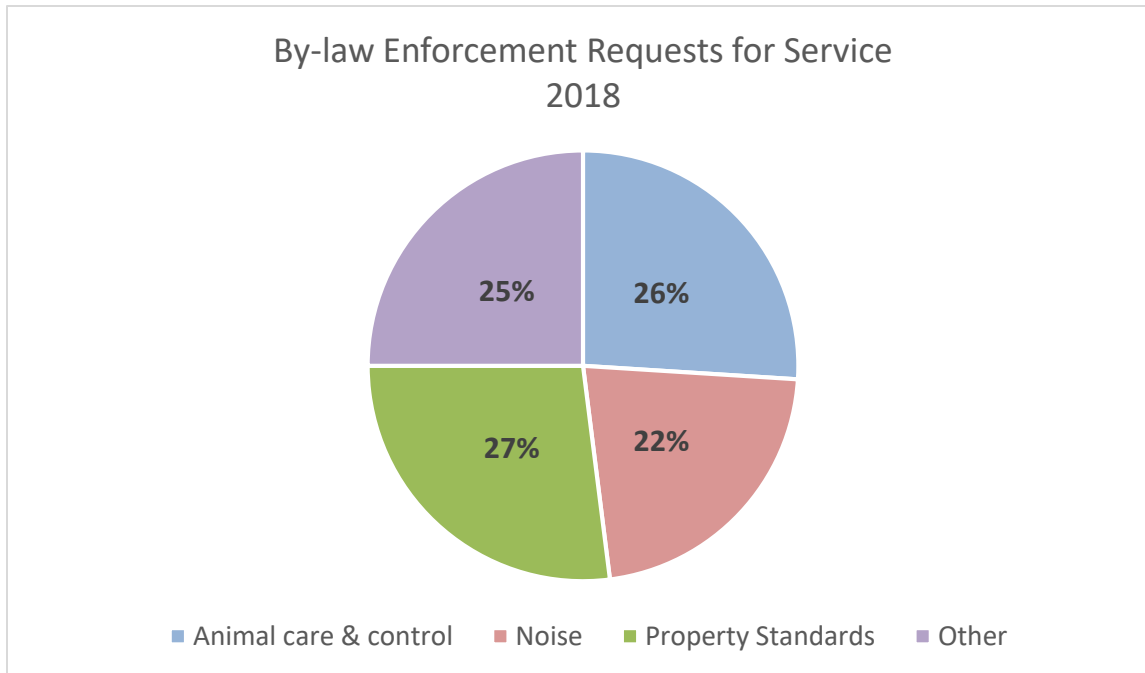


Figure 2: By-law Enforcement 2018 requests for service

This included 12,871 requests (26%) for animal care and control, 10,927 (22%) for noise and 13,433 (27%) for property standards. By-law enforcement does not handle parking related service requests which are handled by the Parking and Licensing Enforcement Branch. With about 40 municipal by-laws to enforce, by-law enforcement officers are expected to apply standards consistently when responding to requests for service.

A priority level is assigned by the dispatcher based on the nature of the call. Call priority is primarily based on the assessment of safety risks. The priority of the call determines the standard time to provide initial response. The table below illustrates targets response times based on the assigned priority.

Table 1: Call priority levels

Priority	Target response time	Examples
1	Within 24 hours (1 day)	Dog bites, needles/syringes, dangerous dead trees, pool fences
2	48 hours (2 days)	Car alarms, music noise, construction noise, taxi-adverse conduct
3	96 hours (4 days)	Information requests, long grass, dogs barking

BLRS target is to meet the standard response times for all priorities at least 80% of the time. In 2018, BLRS met the service standards for Priority 1 service requests 96% of the time, 87% of the time for Priority 2 and 71% of the time for Priority 3. Our audit did not include an analysis of the priority levels or an assessment of the target response times.

Changes underway

A number of initiatives were undertaken in 2018 with the goal of improving efficiency and improving the delivery of BLRS’ mandate.

Currently, BLRS uses the Municipal Application Partnership (MAP) system to manage the flow of service requests. MAP is a suite of business applications that was initially deployed in 1999 and is used in various capacities by various City departments. MAP has not been supported by its vendor for more than a decade and its technical foundation is dated. A new software system to replace MAP for receiving and handling service requests is currently being piloted within BLRS’ Parking and Licensing Enforcement Branch.

The Client Relationship Management (CRM) system is a digital platform for client interaction that is planned to be used by by-law officers when responding to requests for service. The system currently being considered is a cloud-based application so that any electronic device that is connected to the internet can access the application and obtain immediate updates on cases.

BLRS has also implemented the use of Tableau, a data analytics system that provides metrics related to the number, type and location of requests for service, the response time, and other performance measures.

In addition, in 2018, Phase 1 of the Dispatch Modernization Project (DMP) was implemented. This phase involved the integration of GPS into BLRS's fleet and associated dispatch systems. Phase 2 of the DMP, initially contemplated for 2019, was to assign calls to officers based on their GPS location rather than going to the officer next in the queue. The goal of this change was to increase efficiency and reduce travel distance and time between service requests. While GPS is in most BLRS vehicles, from an operational perspective it is currently only being used to investigate complaints against officers.

Audit objectives and criteria

The overall objective of this audit is to provide Council with reasonable assurance that the City has effective processes and practices in place related to by-law enforcement activities. This overall objective was comprised of the following four audit objectives:

1. Assess whether processes and practices are effective to support consistent and efficient delivery of enforcement activities in accordance with BLRS by-laws, policies, procedures and service standards
2. Assess whether adequate training is delivered to enforcement officers
3. Assess whether processes and practices are in place to mitigate risks to the health and safety of officers
4. Assess whether efficient processes are in place for time reporting

Audit objective #1

Assess whether processes and practices are effective to support consistent and efficient delivery of enforcement activities in accordance with BLRS by-laws, policies, procedures and service standards.

Criteria:

- BLRS has comprehensive enforcement policies and procedures and service standards to support consistent delivery of enforcement activities;
- BLRS monitors performance compared to established BLRS service standards, and policies and procedures;
- Service requests are resolved consistently and in accordance with policies, procedures and established service standards; and
- Technology risks are properly managed for key enforcement systems used by BLRS.

Audit objective #2

Assess whether adequate training is delivered to enforcement officers.

Criteria:

- BLRS processes identify training and development needs for enforcement officers; and
- New and current enforcement officers receive required health and safety training and progress against training plans is monitored.

Audit objective #3

Assess whether processes and practices are in place to mitigate risks to the health and safety of officers.

Criteria:

- Processes to identify health and safety risks to officers are effective; and
- Practices and procedures are in place to mitigate health and safety risks to officers.

Audit objective #4

Assess whether efficient processes are in place for time reporting.

Criteria:

- Processes for recording and approving time and leave requests are efficient.

Scope

The scope of the audit includes all management and operational activities related to by-law enforcement. The period under examination was July 2018 to July 2019.

The scope does not include parking and licensing enforcement activities.

Audit approach and methodology

The audit was designed and conducted in accordance with the requirements of the City's Audit Standards to ensure that sufficient and appropriate audit procedures were conducted, and evidence gathered to provide reasonable assurance of the accuracy of audit findings and conclusions, as they existed at the time of the audit.

The audit methodology included the following activities:

- Interviewing staff members involved in by-law enforcement activities and operations support;
- Reviewing and examining relevant documentation relevant to the audit scope areas, e.g. standard operating procedures, service standards, enforcement records, performance reports, training materials, training attendance records, as well as project documents for the implementation of the Dispatch Modernization Projects and the Client Relations Management system;
- Observing enforcement activities during ride-alongs with enforcement officers;
- Reviewing and analyzing enforcement activities between July 2018 and July 2019 through the review of a sample of 30 randomly selected enforcement cases for three types of service requests (i.e. injured animals, noise, and waste and debris) representing 75% of the types of requests received annually; and
- Reviewing the history of enforcement activities at two selected locations.

The audit plan was finalized in November 2019, and the audit fieldwork was substantially completed by January 31, 2020.

Audit observations and recommendations

Audit objective #1

Assess whether processes and practices are effective to support consistent and efficient delivery of enforcement activities in accordance with BLRS by-laws, policies, procedures and service standards.

1.1 Enforcement procedures and service standards

By-law enforcement officers are responsible for the enforcement and administration of roughly 40 municipal by-laws within the City of Ottawa. These enforcement activities vary, which means that officers need knowledge and expertise in many areas such as animal care and transport, noise limits, property maintenance requirements, and property standards. In some cases, this requires not only knowledge of the by-laws but also of provincial legislation that provides the authority for officers to act in response to complaints or requests for service. It is important for officers to have access to proper instructions in order to know how to deal with the various situations they will face. The high volume of service requests also requires procedures and service standards that ensure that officers perform their enforcement activities effectively and consistently. As

such, the audit expected BLRS to have comprehensive documented enforcement procedures and service standards to support consistent delivery of enforcement activities on a timely basis.

We found that BLRS has a documented process describing the steps involved in developing and approving its Standard Operating Procedures (SOPs). The process begins with a priority setting exercise undertaken by the Branch Management Team, which includes BLRS Supervisors, Program Managers, and the Director. The development of SOPs also involves BLRS subject matter experts, and the use of a standard SOP template. The process is well established and was communicated to BLRS officers in May 2019 through a presentation deck which included a process flow chart, roles and responsibilities matrix, as well as a list of SOPs.

We found that BLRS has 91 SOPs to provide enforcement and other instructions to by-law enforcement officers. These SOPs provide details to officers on how to perform their enforcement activities, including definition of terms, detailed procedures, and responsibilities of the various parties, and the applicable by-laws and other legislative authorities. We found that SOPs were in place for 30 of the 43 by-laws (70%) that fall under BLRS's enforcement responsibility. The SOPs developed by BLRS cover most of the activities that officers enforce on a daily basis and that are not directly laid out in the by-law wording, including enforcement activities related to injured animals, noise, and waste and debris. These three areas represent roughly 75% of the requests received by BLRS enforcement officers.

BLRS also has developed service standards which set target times to initially respond to a service request (i.e. contacting the person or organization making the request) and to resolve it. Resolving service requests involves applying enforcement actions. These might include in-person investigations, issuing Notices, fines and/or Orders to comply. Enforcement officers also are expected to follow up on the matter to ensure that action has been taken by the property owner/occupant to comply prior to closing the service request. Service standards for initial response to by-law enforcement service requests are organized in three priority levels:

- 24 hours for a Priority Level 1;
- 48 hours for a Priority Level 2; and
- 96 hours for a Priority Level 3.

Service standards for resolving service requests vary by type of request and range from two days to 30 days. BLRS management aims to meet the service standards for both responding and resolving service requests 80% of the time.

We found that service standards for responding and resolving service requests are documented in a file that is accessible to all officers. However, the service standards are not systematically included in the SOPs that officers rely to guide enforcement activities. Out of the 91 SOPs, 12 SOPs (13%) do not contain the applicable service standards for initial response, and none of 91 SOPs contain the service standard for resolving the request.

BLRS management explained that service standards were developed over time and only finalized in 2018 to improve the response time. Therefore, service standards are not included in all the SOPs because most were developed before that time. BLRS management indicated that officers are aware of the enforcement service standards and that these standards are regularly communicated to them during staff meetings. This awareness of service standards on the part of officers is consistent with our observations while interacting with officers.

SOPs are the key procedural documents that provide enforcement instructions to officers. The absence of service standards in SOPs increases the risk that enforcement activities are not performed as per the expected service level targets.

Recommendation #1

That the City develop a strategy to update, communicate and reinforce to enforcement staff its initial response and resolution service standards on an ongoing basis.

Management response:

Management agrees with this recommendation.

Service standards are reviewed on a monthly basis and Supervisors are provided with a list of Officers with open cases exceeding 30 days for resolution. Response and resolution targets will be added to the SOPs and will continue to be communicated to Officers. It should be noted that some types of service requests, such as zoning or property standards, can take longer than 30 days to resolve due to the Order to Comply and Notice of Violation processes, which are subject to legislated timelines and the potential for appeals. This work will be completed by the end of Q2 2021.

1.2 Monitoring performance against procedures and service standards

Given the high volume and wide range of service requests, we expected to find processes and practices in place to monitor the performance of enforcement activities against SOPs and service standards as a way to ensure that officers are enforcing by-laws effectively. Monitoring the performance of enforcement activities includes evaluating whether officers use their time effectively and are located where they need to be to investigate service requests.

BLRS management has installed Global Positioning System (GPS) devices in officers' vehicles in 2018 as part of an initiative to improve dispatch and the efficiency of enforcement activities. At the time of our audit, the GPS was not being used to monitor the location of officers in real time. We expected to find that BLRS was collecting and analyzing GPS data to optimize the efficiency of enforcement operations.

We found that BLRS management monitors the performance of enforcement activities against service standards by preparing and reviewing monthly performance reports. One such report provides the number of service requests assigned to each enforcement officer for the month and indicates how many were closed or in progress at the end of the month. The report also provides the average number of days that officers took to respond and close service requests.

BLRS management reviews this report with supervisors during monthly meetings of the Branch Management Team. This review however is limited to an assessment of overall number of service requests and workload. The performance report is not sent to enforcement supervisors for further analysis and is only provided to them upon request. We found that there is no set process in place and no clear expectations for supervisors in terms of how they should be using these reports to manage officers' performance. In addition, the information provided in the performance reports does not take into account the complexity and priority levels of the service requests, information that could explain delays compared to service standards. As a result, supervisors do not use these reports to monitor the performance of enforcement activities. Rather, supervisors are monitoring performance on an ad hoc basis through "spot checks" of activities in the enforcement database, occasional ride-alongs with officers, and internal investigations when public complaints are raised against officers. These monitoring activities are not documented nor recorded, so we could not assess the frequency or completeness of these supervisory duties.

While the performance reports are useful for providing a snapshot of how the by-law enforcement branch is doing compared to service standards, these performance reports do not provide sufficient information to assess whether by-law and property standards officers are enforcing in accordance with BLRS' operational procedures. This is an important element of performance monitoring so that enforcement activities are consistently applied by officers and that deficiencies can be corrected on a timely basis. We also made enquiries with a sample of other Canadian cities to see whether practices were similar and where we might be able to leverage some best practices. We found that other cities also rely on supervisors to monitor performance using monthly reports that measure officers' workload and time to close cases. While some cities indicated that they do spot checks of enforcement records, similar to BLRS, the spot checks are not documented.

Monitoring and assessing enforcement compliance are important to ensure that officers are enforcing applicable by-laws in the same way and that similar service requests are dealt with consistently. It is also important to ensure that monthly performance reports contain useful and complete information that can be used by supervisors to assess the quality of enforcement activities and implement required improvements.

With regards to the collection and availability of GPS data, we examined management's access to GPS data collected from officers' vehicles since 2018. We found that BLRS has access to all data collected since the GPS devices were installed in officers' vehicles in 2018. BLRS management accesses the GPS information through an online platform operated by its GPS technology service provider.

In April 2019, the City's Fleet Services took over the management of BLRS GPS data and entered into a contract with a new GPS service provider. Under the new contract arrangement, GPS data will be available on the service provider's online platform for a period of 365 days, after which the data is destroyed. The City can download the GPS data to keep a longer-term record of the data, but this requires the development and implementation of a systematic process. Fleet Services is currently working to implement a feature that allows GPS data to be downloaded daily. This feature is planned to be in place by end of March 2020. If implemented as planned, this solution should allow for adequate preservation and availability of GPS data to allow it to be used to improve the efficiency of operations.

Recommendation #2

That the City define expectations for performance monitoring of enforcement activities, including use of performance reports.

Management response:

Management agrees with this recommendation.

While BLRS has performance reporting and other monitoring mechanisms in place, BLRS will establish and implement a formal process to define expectations for performance monitoring of enforcement activities. This will include scheduled reviews of performance reports and GPS data that will be documented and provided to Supervisors routinely. This work will be completed by the end of Q4 2021.

Recommendation #3

That the City implement its proposed GPS data retention plan.

Management response:

Management agrees with this recommendation and it has been implemented

GPS data is available and can be accessed by Management daily in a live application for one year and in accordance with the retention plan described in this audit report.

1.3 Enforcement Activities in Response to Service Requests

Procedures and service standards were developed by BLRS management to provide instructions to officers on how to perform enforcement activities and promote consistent and effective delivery of enforcement activities in response to service requests made by the public. We expected to find that officers perform their enforcement activities in compliance with these procedures and service standards.

In order to assess whether service requests were responded to consistently and in accordance with procedures and service standards, we reviewed enforcement activities for a random sample of service request case numbers as well as the history of enforcement activities at two selected locations. The types of service requests reviewed were for injured animals, noise, and waste and debris. These types of requests represent roughly 75% of the requests received by BLRS.

Attending to injured domestic or wild animals requires pick up and transport of the animals to the Ottawa Humane Society or, if outside of regular working hours, to private

animal emergency veterinary clinics. These requests have a Priority Level 1, which means that officers are expected to attend to the animal within 24 hours.

Noise complaints are Priority Level 2 requests, which means that officers have 48 hours to contact the complainant, obtain relevant information about the complaint, and visit the location where noise can be heard. For security reasons, procedures call for two officers to visit identified locations after 10 p.m. Based on their inspections and the gravity of the noise violation, officers can issue:

- Verbal warnings;
- By-law infraction notices, which are written warning notes left on site when the officer is not able to speak with the defendant; and
- Provincial Offence Notices, which are enforcement tickets carrying a fine.

Waste and debris service requests are enforced based on a progressive enforcement model. As such, they may involve several inspections at the same location and the issuance of progressive enforcement forms such as warnings, Notices of Violation, Orders to comply and/or fines before cases are resolved. Waste and debris service requests are Priority Level 3 and as such officers are to contact the complainant within 96 hours, obtain relevant information about the complaint, and visit the location of the alleged violation.

If the officer observes a violation, a written Notice of Violation may be issued to require the defendant to remove waste and debris from the location within a period of time that is determined at the discretion of the officer. The officer would then return to the location after the Notice period to confirm that waste and debris was removed. Failure to comply by the deadline may result in a second Notice or a fine being issued. In the case of fines (charges), officers have up to 30 days from the date of the offence to issue a ticket. Failure to comply also may result in the City having the work carried out by one of the City's approved contractors at the expense of the owner.

Compliance with both SOPs and service standards

We found that enforcement actions were performed in accordance with both SOPs and established service standards for initial response and resolution in 23 of the 30 reviewed cases (77%).

Compliance with SOPs only

When we compared enforcement actions taken to SOPs, we found that actions taken complied with operational procedures in 27 of the 30 reviewed cases (90%). Cases of non-compliance with operational procedures included:

- One case for which there was no evidence of two officers attending a noise complaint at night;
- One case where there was no evidence that relevant information about a waste and debris complaint was obtained by the officer before conducting the on-site inspection; and
- One waste and debris case where fines were not issued despite the many prior violations at the same address.

Compliance with service standards

When we looked at compliance against service standards, we found that the initial response and resolution targets were met in 25 of the 30 reviewed cases (83%). This rate exceeds the 80% target set by BLRS management. One of the five cases where service standards were not met involved a waste and debris case where the initial response was 61 days beyond the service standard of 48 hours (2 days) and 86 days beyond the service standard of 30 days to resolve (close) the case. Two other cases involved situations where the initial response was between 2 and 6 days beyond the service standard of 48 hours (2 days). Another two cases involved situations where the time to resolve (close) the case took between one and 26 days beyond the service standard of 30 days.

There are a variety of factors that can impact the ability to respond to requests for service on a timely basis. These include increasing demand, shift work and resourcing. As described above, in 2018 BLRS received 8% more service requests than in 2017, which was up 8% from 2016.

History of enforcement actions at two selected locations

As part of our sample, we selected two specific locations in the Sandy Hill area and examined the history of enforcement activities to assess the application of progressive enforcement. Progressive enforcement means the use of more stringent consequences for repeat offences. We selected three properties, two of which were at the same location, that had a history of requests for service for the same issue.

Our review of enforcement activities at the three properties identified 24 service requests for recurring waste management complaints between May 2018 and September 2019. Based on our review of enforcement records, we found the following:

- There were seven cases where progressive enforcement options were not applied. In these cases, a Notice of Violation, an Order to comply or a fine could have been issued under the provisions of the corresponding by-law (Property Maintenance or Property Standards).
- There were six cases where the initial response and/or resolution took longer than the service standards. In one of these cases, the initial response was four days after the complaint while in another case the initial response was roughly two weeks later. In the four other cases, there was either no evidence of a follow-up inspection or the re-inspection occurred several months later.

These enforcement activities took place in the context of a 2017-2019 pilot project aimed at strengthening enforcement of waste management in the Sandy Hill area. The pilot aimed to expedite the resolution of complaints and minimize the number of repeated offenses and unresolved cases. To do so, the applicable by-law was amended to extend waste management obligations to both the owner and the occupant of the property and hold them both accountable in cases of repeated violations. The amendment also required all garbage and recycling bins to be enclosed and not visible from the road, except for one green bin that may be stored in the front yard. BLRS management expressed concerns about the enforceability of the by-law amendments and that enforcement of the new provisions would be conducted as resources permit.

BLRS believes that cases where service standards were not met were not due to lack of awareness on the part of officers. Rather management attributes the delay in responding to a capacity issue due to limited resources due to an increasing volume of service requests. Management also noted that meeting service standards is particularly challenging in Sandy Hill since the introduction of stricter waste management rules. When faced with multiple requests for service, officers must prioritize their enforcement activities and may decide to delay responding or closing lower priority level calls such as waste and debris complaints.

Although the review of enforcement activities suggests overall compliance with SOPs and service standards for responding and closing service requests, reinforcement of requirements is required to improve consistency and timeliness of enforcement activities. There is also an opportunity for BLRS to determine if current resources have to be re-allocated, or if more resources are required, to respond and close service

requests in a timely manner. More consistent and timely enforcement will improve BLRS' service delivery and reduce the number of repeat complaints from citizens who feel their requests are not being resolved in a timely manner.

Recommendation #4

That the City develop and implement a plan to improve ongoing communication of SOPs and service standards to by-law officers and monitor the impact of the plan on service delivery.

Management response:

Management agrees with this recommendation.

BLRS will develop and implement a plan to improve ongoing communication of SOPs and service standards to By-law Officers and will monitor the impact of the plan on service delivery. There is currently a process in place where Supervisors review SOPs and track those reviews with their staff; however, BLRS will formalize this process into a documented plan. This work will be completed by the end of Q4 2021.

Recommendation #5

That the City develop a strategy to improve the timeliness of by-law enforcement including leveraging the use of technology to improve the efficiency of operations.

Management response:

Management agrees with this recommendation, and it has been implemented.

Leveraging technology to improve the timeliness of by-law enforcement is a priority for BLRS. Understanding that this work is on-going and will develop further as technology evolves and becomes available, BLRS has ensured that documents comprised in the City's existing project management framework contain a requirement for a scan and analysis of the available technologies to improve service delivery and efficiency of operations. This scan will be required for all significant projects internal to BLRS going forward, including the Dispatch Modernization Project and MAP replacement CRM. Once implemented, these projects will improve the timeliness of by-law enforcement.

1.4 Managing technology risks

We expected to find that BLRS uses technology to support its enforcement activities and effectively manages the related technology risks. Proper technology is required for by-law officers to perform their duties effectively and efficiently in two key areas, dispatch and the flow of service requests.

To improve dispatch practices, BLRS developed a business case in 2017 for a Dispatch Modernization Project to modernize its practices and procedures which had not changed since 2013. The objective of this project was to use GPS technology to track the location of by-law enforcement vehicles to improve efficiency in the following areas:

- Dispatch optimization and resource management;
- Fuel consumption;
- Asset management; and
- Officer safety and risk management using driving habit analytics.

Phase 1 of the project was to implement GPS technology in all 84 by-law enforcement vehicles. BLRS installed GPS devices in officers' vehicles and started collecting location data in 2018. The plan for phase 2 of the project was to use GPS data to modernize dispatch activities, such as assigning enforcement cases based on the officers' location, automating the intake to close out process for service requests, and performing data analysis to optimize enforcement operations.

However, the project status reports that we reviewed indicate that phase 2 of the project is on hold until BLRS management can define how they want to use the GPS data to improve dispatch activities and overall efficiency of enforcement activities. In the interim, GPS data that is collected is only used by BLRS management to assist with investigations of complaints against officers. Management indicated that they have not been able to dedicate sufficient resources to the project to keep it progressing. Given the delays with defining the project requirements, BLRS is not able to achieve the intended benefits of its initial investment.

BLRS uses the MAP system to manage the flow of service requests. MAP is a suite of business applications and a development platform that was initially deployed more than twenty years ago in 1999 and it continues to be used in various capacities within the City. MAP's underlying technology has not been supported by its vendor for more than a decade and its technical foundation is dated. BLRS is planning to replace MAP with a CRM system to manage the flow of service requests.

The CRM system is a digital platform for client interaction that is planned to be used by by-law officers when responding to requests for service. It is a cloud-based application so that any electronic device that is connected to the internet can access the application and obtain immediate updates on cases. Currently the CRM solution is being piloted within BLRS' Parking Enforcement and Logistics Branch, before being implemented

within the By-law Enforcement Branch. At the time of our audit, full implementation and testing of CRM within parking enforcement was scheduled for Q1 2020⁵.

We found that BLRS has yet to define requirements for the implementation of the CRM system within by-law enforcement. The CRM Project was initiated following the approval of a 2018 business case recommending a City-wide solution to replace the outdated MAP system. The intended benefits of the proposed CRM solution were fuel cost savings, service optimization and improved client satisfaction. In the context of BLRS, the new CRM system would provide a platform for receiving and handling service requests and aim to increase effectiveness and efficiency of service delivery and to respond to increasing demands through better use of technology. At the time of our audit, as the CRM system had not been developed and implemented, its intended benefits for by-law enforcement have not been achieved.

We surveyed a sample of three other Canadian cities on their use of technology in support of by-law enforcement activities. We found that each city was using a GPS system. However, similar to BLRS, GPS data was not being used to dispatch officers or to improve the efficiency service delivery. However, one city is currently piloting a project to use GPS data to assign requests for service to officers in the field.

BLRS management has acknowledged the need to implement CRM within by-law enforcement after its full implementation within parking enforcement. However, there are currently no plans and no defined requirements for implementation of CRM within by-law enforcement. BLRS management advised that implementation in by-law enforcement is expected by the end of 2021 as enforcement activities are more complex than parking enforcement activities. In the meantime, activities within by-law enforcement rely on an outdated service request management system that is no longer supported by the vendor. It is also not able to provide the benefits of a modern and integrated solution, such as improved data visualizations, data analytics capabilities, and connectivity capabilities with other technologies such as GPS devices.

For both the DMP and CRM projects, it is important for resources to be assigned to the projects to complete the implementation plan so that the intended benefits can be achieved. Having dedicated resources to the projects will provide an opportunity to assess the benefits of each solution and quantify measurable benefits, if any.

⁵ Management indicates that subsequent to our audit, this was completed in Q1 2020.

Recommendation #6

That the City define its project requirements for implementation of the next phase of the Dispatch Modernization Project so that the planned efficiency of service delivery is achieved.

Management response:

Management agrees with this recommendation.

The Dispatch Modernization Project is currently underway. Work is being done by the Project Management Office and BLRS to finalize the current-state and future-state documentation, at which point the project requirements can be defined. This work will be completed by the end of Q2 2021.

Recommendation #7

That the City define its requirements and implement the CRM project within by-law enforcement should the expected benefits still warrant the investment.

Management response:

Management agrees with this recommendation.

This agile project is currently underway, with its requirements already established and defined, as an enterprise solution to replace the current MAP program. This project is expected to be completed in Q4 2022.

Audit objective #2

Assess whether adequate training is delivered to enforcement officers.

2.1 Identification of training needs

Considering the broad range of by-laws and operational procedures, it is important for enforcement officers to receive sufficient training so that they have the knowledge and skills to carry out their enforcement duties effectively. For this reason, we expected to find processes to identify the training that enforcement officers need as well as processes for developing training material and courses that support the necessary training. We also expected to see that processes were in place to maintain a training plan for each officer.

We found that BLRS developed training manuals in 2016 for new by-law enforcement officers. These training manuals are used to teach officers how to:

- Interpret and enforce by-laws;
- Write infraction notices, Notices of violation, and tickets; and
- Use enforcement equipment such as noise meters and heat readers.

The training manuals have not been reviewed or updated since 2016. In addition, BLRS developed a series of health and safety training modules on various topics, such as the handling of wild animals and dangerous dogs. These health and safety modules were developed at different points in time between 2010 and 2018. There is no formal review schedule to refresh and update training materials.

While training materials exist and are being used to deliver training to officers, we found that BLRS management identifies training requirements and develops training material on an ad hoc basis rather than using a formal and documented process. BLRS management relies on supervisors and their interaction with officers to identify training that their officers might need. This is a similar approach to a sample of other Canadian cities that we surveyed. However, some cities use the annual performance appraisal process to identify areas for development.

The audit also found that BLRS does not develop and maintain training plans for enforcement officers. The evidence shows that BLRS management participates in the Annual Corporate Learning and Development Exercise led by the EPS Branch. Through this exercise, BLRS and other EPS Services report on planned operational training and mandatory corporate training. This planning exercise allows for Branch coordination and evaluation of required budgets, however it does not lead to the development of formal training plans for enforcement officers. A training plan is an important element of a robust training program because it documents training activities that will be delivered to enforcement officers so that they have the skills and knowledge to do their jobs effectively and safely. This also helps to ensure that all officers are receiving required training to support consistent delivery of service within the provisions of the applicable by-laws.

Recommendation #8

That the City establish a formal process for developing and updating enforcement and health and safety training curriculums.

Management response:

Management agrees with this recommendation.

Prior to January 2020, training was part of a larger portfolio that included Logistics and management of projects. Since that time, BLRS has established a resource responsible for training as part of their portfolio. Duties include: the review of training needs (Corporate and BLRS-specific), the coordination of delivery, and the maintenance of staff training records on an on-going basis. BLRS will establish a formal process to review and update training materials at pre-determined intervals as well as developing a formal training plan and curriculum. This work will be completed by the end of Q4 2021.

2.2 Delivery of training

Given that service delivery is at the core of BLRS operations, training is one way to strengthen skills so that officers have a consistent approach to enforcement. As such, we expected to find that new and current enforcement officers are receiving enforcement and health and safety training.

We found that enforcement training is delivered to new by-law enforcement officers using a combination of classroom instruction, online learning, and ride-alongs. New by-law enforcement officers also go through a formal coaching program where experienced officers walk them through a series of modules and scenarios to prepare them to go in the field. A training checklist is available to the coach to ensure that all required modules and topics are covered before sending new officers in the field. New officers also have to take “use of force” training and a City-wide mandatory health and safety training course.

Officers who are assigned to property standards enforcement follow additional training offered by the Ontario Association of Property Standards Officers (OAPSO) to further their knowledge of legislation governing the maintenance, occupancy and repair of property.

We selected a sample of enforcement officers to assess whether they received the required enforcement and health and safety training. Based on our review of available training records, eight of the ten officers (80%) received the required use of force training. However, for the remaining two officers (20%), training attendance records

were incomplete. BLRS management indicated that one of these two officers was on leave and the other officer received training, but no attendance records could be provided.

Based on our review of available training records for property standards officers (PSOs), there was no evidence that the PSOs received the OAPSO training. BLRS management indicated that the officers received OAPSO training but that attendance sheets were not kept and that attendance was not recorded in the City's Human Resources SAP System. We found similar observations for new officer training. While management indicated that new officer training was provided as planned, there was no documentary evidence that the officers received the training.

We also found that BLRS does not have a process in place to monitor that all required enforcement training has been delivered to officers. Rather, BLRS management monitors the use of force and OAPSO training courses only. Management meets once a year to identify which officers should take these courses. Discussions and decisions from this meeting are not documented.

Based on our review of health and safety training records, each officer received their City-wide mandatory health and safety course.

Maintaining training records is an important measure for assessing whether officers are on track with BLRS' internal training requirements and mandatory training. Training records also can help to assess the appropriate timing for refresher training for each officer and to identify who needs further training.

Recommendation #9

That the City maintain complete lists of required training, and records of courses and training taken by officers.

Management response:

Management agrees with this recommendation.

Further to the response provided for Recommendation 8, as part of the proposed training plan and curriculum, all records related to courses and training completed by BLRS staff is currently being inputted into the corporate employee enterprise software (SAP). This work will be completed by the end of Q2 2021.

Audit objective #3

Assess whether processes and practices are in place to mitigate risks to the health and safety of officers.

3.1 Identification of health and safety risks

Enforcement activities involve many health and safety risks and considerations. Officers interact with the public, often in enforcement situations, and handle wild animals, waste, debris, and needles. We expected to find processes by which BRLS identifies health and safety risks faced by the officers and develops mitigation measures.

We found that BLRS identifies health and safety risks on an ad hoc and informal basis. However, the risk of not having a formal process is low as there are measures in place to help mitigate health and safety concerns. For example, BLRS management indicated that health and safety risks are raised by BLRS' Joint Occupational Health and Safety (JOHS) Committee. This Committee is comprised of officers and other employees who meet regularly to discuss JOHS matters and bring issues to management. BLRS management also indicated that by-law enforcement officers with specific knowledge and expertise also identify health and safety considerations and contribute to the development of mitigation practices. A recent example of this is wildlife training modules that were developed by leveraging the expertise of certain officers. BLRS health and safety risks can also be identified through the participation in periodic City-wide JOHS exercises, such as the Hazardous Identification Risk Assessment exercise, set out by the Ministry of Labour.

3.2 Mitigation of health and safety risks

We expected BLRS management to have practices and procedures to mitigate health and safety risks to officers. We examined training material, SOPs, and other documentation to identify evidence of measures put in place to mitigate health and safety risks to officers.

We found that BLRS has incorporated health and safety aspects as part of the training delivered to by-law enforcement officers. Health and safety considerations related to wildlife, dog behaviour, and dog bite prevention are covered in training modules which are incorporated into onboarding training of new officers. In addition, property standards officers receive health and safety training from OAPSO in the areas of hoarding, fire safety, and mould and asbestos.

We found that BLRS management has integrated health and safety mitigation as part of the SOPs developed to instruct officers on how to perform their enforcement activities. There are SOPs providing standards and guidance for officers' safety gear and equipment, including footwear, and headgear. In addition, there are many operational SOPs developed to mitigate various health and safety risks related to the use of force, removal of needles, inspection of buildings involving asbestos and mold, etc. However, more systematic inclusion of health and safety considerations in SOPs could be achieved by adding a dedicated "health and safety section" in the SOP template.

We also found that BLRS management has developed a series of checklists to assist officers in verifying that the vehicles that they use contain the equipment they need to safely perform their enforcement activities, including handling of animals. Examples of equipment checklists include the wildlife control officer equipment checklist and the generalist equipment checklist. However, officers are not required to complete these checklists and there is no documented approach as to how these checklists should be used. As a result, these checklists are not being completed and filed. BLRS management advised that these checklists were developed as a guide to officers, so that they could identify missing equipment at the beginning of their shifts.

In our enquiries with other Canadian cities, we found that they mitigate health and safety risks in a similar manner to BLRS. Practices include the use of personal protective equipment and checklists as well as having an Occupational Health & Safety Committee.

Audit objective #4

Assess whether efficient processes are in place for time reporting.

4.1 Recording and approving time and leave requests

During our audit, concerns were raised through the Fraud and Waste Hotline alleging inefficient time reporting practices. In response to the concerns, we reviewed BLRS' process for recording and approving time and leave requests to assess whether more efficient practices were required. We also compared these practices to those of other City groups to identify potential cost-savings measures that could be considered by BLRS.

We found that the process for recording and submitting timesheets for approval varies depending on whether staff members are full-time salaried, part-time salaried, or casual, and whether staff members have standard (fixed) work schedules or non-standard work schedules.

Staff who have a defined work schedule report their time on an exception basis using the City's online SAP self-serve system. Employees who do not have a defined work schedule use a manual timesheet process. In BLRS, there are roughly 49 FTEs who use the City's online SAP self-serve system and roughly 133 FTEs who use a manual timesheet to report time and/or leave. The manual process involves hardcopy timesheets that are completed by the officer, signed-off by a supervisor and submitted to City Payroll for entry into SAP. A carbon copy of the signed-off timesheet is provided to the officer for their records. In addition, BLRS staff photocopy the timesheet, document leave codes and dates, and retain a copy onsite for administrative purposes.

Although it is not a modern or efficient process, we found that the use of manual timesheets for employees who do not have a defined work schedule is consistent with practices used by some other City branches. This included copying timesheets and keeping a duplicate record onsite. Since shift work is common within BLRS, the use of timesheets for time and leave reporting is reasonable. However, we did note some inefficiencies with certain administrative tasks which have been discussed with management.