Report to / Rapport au:

OTTAWA POLICE SERVICE BOARD
LA COMMISSION DE SERVICE DE POLICE D'OTTAWA

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Submitted by / Soumis par:
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SUBJECT: **INTERNAL AUDIT AND QUALITY ASSURANCE ANNUAL REPORT, 2024 (COMPLIANCE WITH MINISTRY STANDARDS)**

OBJET: **RAPPORT ANNUEL D'AUDIT INTERNE ET D'ASSURANCE QUALITÉ (CONFORMITÉ AUX NORMES DU MINISTÈRE)**

REPORT RECOMMENDATIONS

That the Ottawa Police Service Board receives this report for information.

RECOMMANDATIONS DU RAPPORT

Que la Commission de service de police d'Ottawa prenne connaissance du présent rapport à titre d'information.

BACKGROUND

The Community Safety and Policing Act (CSPA) and Ontario Regulation 392/23 Adequate and Effective Policing provide the foundation for Quality Assurance (QA) in policing across Ontario. These regulations set expectations for police services and their Boards to maintain compliance, adequacy, and effectiveness in service delivery.

Key requirements include:

- CSPA Section 11 mandates that police services maintain adequate and effective policing and comply with the Act and regulations.

- Ontario Regulation 392/23 requires police services and their boards to establish and maintain a quality assurance process to ensure compliance with legal requirements and the provision of adequate and effective policing.

- The Policing Standards Manual (Standards) complements the regulation by guiding the police service's operational requirements, such as administration and infrastructure, crime prevention, law enforcement, victim support, public order maintenance, emergency response, and counterterrorism.

DISCUSSION

In Ontario, effective policing relies on internal controls to ensure compliance with the Community Safety and Policing Act. Quality assurance plays a key role in maintaining oversight, supervision, mandated training, and provision of necessary equipment. These efforts are further supported by policies, protocols, and partnerships aligned with regulatory standards.

The Ottawa Police Service (OPS) integrates QA through a structured approach that includes:

- Internal audits to assess compliance and operational effectiveness.

- Policy analysis and development to align with legislative and regulatory requirements.

- Compliance reviews to ensure adherence to policing standards.

- Risk assessments to identify potential vulnerabilities and mitigate operational challenges.

- Continuous improvement to refine processes, enhance efficiency, and optimize service delivery.

The Strategy and Communications Directorate oversees the OPS quality assurance process, applying a risk-based approach informed by senior leadership. This flexible framework allows the police service to address emerging priorities while ensuring alignment with policing best practices.

2024 Internal Audit Engagements

The 2024 Internal Audit Plan, approved in February (2024), includes three engagements aligned with legislative requirements, organizational priorities, and available capacity. The plan was developed using risk assessments, past audits, budget priorities, and the Board's Strategic Plan. It was endorsed by the Finance and Audit Committee and approved by the Board.

Each audit begins with a business area review to understand operational context and identify key risks. The scope is then refined to ensure risks are properly assessed and

prioritized. This process includes reviewing records, conducting interviews, and analyzing data to gain a full understanding of potential exposures.

Findings from this review inform the audit program, which defines specific objectives based on identified risks. A Terms of Reference (TOR) document is drafted to outline the audit's objectives, scope, and methodology. The TOR is reviewed with management to ensure alignment before approval, providing a clear foundation for an effective and structured audit.

Currently, the Property and Evidence Control and Paid Police Duty audits are in the reporting phase, with draft reports provided to management. Updates on these engagements will be provided through the Finance and Audit Committee. The Accommodations Strategy Audit was cancelled to avoid duplication with ongoing reviews by the Office of the Auditor General and an evaluation being conducted by MNP.

Status:

Audit of Property and Evidence Control

- **Objective**: Assess compliance with regulatory standards and the OPS Right of Refusal process to ensure adherence to policy and standards.

- **Status (Reporting Phase)**: Management has been debriefed, and a draft report has been provided for response. The results will be provided at an upcoming Finance and Audit Committee (FAC) meeting.

Audit of Paid Police Duty

- **Objective:** Assess the effectiveness of processes and controls governing paid duty operations, ensuring compliance with policies and regulations while enhancing operational efficiency and employee well-being.

- **Status (Reporting Phase):** Management has been debriefed, and a draft report has been provided for response. The results will be provided at an upcoming Finance and Audit Committee (FAC) meeting.

Audit of the OPS Accommodations Strategy

- **Objective:** Assess alignment with organizational needs and regulatory requirements.

- **Status (Cancelled):** This engagement has been cancelled to allow the Office of the Auditor General (OAG) to complete the Audit of Staffing and the MNP to

complete the Wellness Evaluation, which covers aspects of the accommodation strategy.

<u>Management Action Plan (MAP) Status update</u>

Internal Audit monitors the progress of Management Action Plans (MAPs) and provides quarterly reports to the Chief and Senior Leadership Team (SLT) to ensure implementation and accountability. Before closing a MAP, Internal Audit verifies completion through supporting evidence, conducts regular follow-ups, and reports on their status, including overdue items, on a quarterly basis to Senior Leadership and annually to the Board.

Since 2014, Internal Audit has issued 123 recommendations, with the following status:

- Closed: 87 (including 15 closed in 2024)

- Not Yet Due: 18

- Overdue: 18

The overdue MAPs fall into two categories: compliance-driven requirements and operational improvements.

Compliance-Driven MAPs: These are critical for ensuring adherence to regulatory frameworks, external oversight requirements, and internal governance policies. Addressing these MAPs mitigates risks related to legal, regulatory, or policy non-compliance.

Good Practice MAPs: These recommendations focus on enhancing efficiency, automation, and governance structures. While not tied to compliance risks, their implementation strengthens resource management, streamlines procurement processes, and improves data integration for better decision-making.

Both categories of MAPs contribute to overall organizational effectiveness, with compliance-driven actions ensuring adherence to established requirements and good practice initiatives fostering continuous improvement.

Despite ongoing progress, some MAPs remain overdue due to complex implementation requirements, resource constraints, and interdependencies. Certain recommendations require policy development, system integrations, or multi-unit coordination, which extend timelines. Additionally, operational demands and competing priorities impact the ability to allocate resources efficiently. Internal Audit continues to monitor these outstanding MAPs and works closely with management to drive completion and sustainable implementation.

Advisory Engagement Summary:

As part of the 10-year study on traffic stop race data, Internal Audit issued a management letter highlighting the risk of non-compliance with O. Reg. 58/16: Collection of Identifying Information in Certain Circumstances. The issue arose from calls for service being coded as "regulated interactions" in the Computer-Aided Dispatch (CAD) system but not consistently recorded in the Records Management System (RMS). This discrepancy could lead to inaccurate reporting in the annual Ottawa Police Service Board Report on Regulated Interactions. The Inspector of the Investigator Support Branch has been assigned to review files for coding accuracy and documentation completeness.

Management's actions include:

- Review of data entry processes to identify gaps.

- Assess the need for training to improve accuracy and compliance.

- Implementing stricter verification protocols before finalizing CAD entries.

These steps are intended to address the identified risks and improve compliance with regulatory requirements. Progress updates will be provided through the Finance and Audit Committee.

External Reviews and Regulatory Oversight

Internal Audit supports external oversight engagements, including audits and inspections conducted by the Office of the Auditor General (OAG) and the Inspectorate of Policing (IoP).

OAG's Audit of Staffing

As part of the OAG's three-year audit plan, an Audit of Staffing was launched in August 2024 following the OAG's risk assessment of OPS operations. With the support of HR/Corporate Support (CSD), Internal Audit coordinates document submissions, facilitates communications, and supports stakeholder engagement. Weekly coordination meetings with OAG, Internal Audit, and HR/CSD are in place to ensure progress. The audit has entered the Fieldwork (Conduct) stage, requiring additional records, discussions, and continued cross-team collaboration.

<u>Inspectorate of Policing (IoP) Assessment</u>

The CSPA authorizes the IoP to conduct reviews, investigations, and inspections to ensure police services meet adequacy and effectiveness standards. In 2024, OPS participated in the Police Services Information Survey and Policing Insights Statement, as required by the IoP. These initiatives support the Inspector General's oversight mandate by collecting data on operations, staffing, and service delivery. Internal Audit facilitates coordination across multiple sections to ensure timely and accurate submissions.

Service Policy

Policy management is a critical component of good governance, helping to promote regulatory compliance, control risks, establish accountability, and drive strategic goals and objectives. In 2024, the Policy Development Office (PDO) undertook significant work to enhance policy alignment with the newly implemented CSPA, which took effect on April 1, 2024. All policy development efforts throughout the year were centred on ensuring compliance with this legislative framework and supporting operational efficiency and best practices within OPS.

<u>Policies Completed:</u>

- Conflict of Interest – Investigations Policy – Meeting ministry standards outlined in O. Reg 401/23 of the CSPA.

- Policy Framework and Lifecycle Document – Standardizing the approach to policy development, implementation, and review.

- Reporting Member Conduct Policy – Meeting obligations for member conduct under the CSPA.

- Workplace Harassment Policy – Updated to reflect the new definitions for "workplace harassment" and "workplace sexual harassment" to align with the Working for Workers Five Act.

<u>Policy Development</u>

While several key policies were finalized, PDO also devoted substantial efforts to ongoing policy development, ensuring alignment with legislative requirements and emerging best practices. Key areas of policy development include:

- Use of Force and Weapons—Align operational policies with regulatory oversight to ensure appropriate use of force standards, reporting requirements, and training provisions.

- Adequate and Effective Policing – Strengthening policies related to investigative procedures, community safety initiatives, and law enforcement best practices to enhance service effectiveness and responsiveness.

- Emergency Response – Developing a comprehensive Active Attacker Incident Response Framework to improve preparedness and operational capabilities in high-risk situations.

- Investigations and Specialized Operations – Standardizing investigative processes and specialized operational protocols to ensure legal compliance, accountability, and best practices in law enforcement investigations.

- Ethical Standards—Establishing clear guidelines on permissible behaviour and activities, such as political activities, to uphold the impartiality and integrity of the service.

Standardization of Policy Development

A key milestone in 2024 was developing and implementing a structured Policy Framework and Lifecycle that enhances transparency, accountability, and consistency across all operational areas of the police service.

Commitment to Compliance with the CSPA

Throughout 2024, the PDO's primary focus was ensuring all policies and procedures adhered to the Community Safety and Policing Act (CSPA). This work has helped shape policies that reflect modern policing standards, enhance community trust, and comply with provincial oversight requirements.

Looking ahead, the OPS remains committed to aligning policies with the CSPA, strengthening governance, and ensuring that our policies evolve alongside community expectations and legislative advancements.

Quality Assurance Capacity

In 2024, the police service focused on strengthening its QA function to align with the CSPA. We are working with investments made in the 2024 and 2025 budgets to increase the team with an internal auditor and a quality assurance position reporting to the newly hired Manager of Quality Assurance and Internal Audit. Two additional vacancies are being filled with one candidate in the final stages of the hiring process.

To meet the requirements of the audit work plan and regulatory needs, the service adopted a co-source staffing model. This model uses contract resources to scale capacity as needed, ensuring the team can support strategic priorities and operational requirements.

Additionally, the Policy Development Office (PDO) expanded its capacity to address the growing demand for policy work. The PDO increased staffing levels by employing two full-time employees. This will help ensure the PDO can meet the increasing needs of comprehensive policy development.

FINANCIAL IMPLICATIONS

There are no financial implications associated with this report.

SUPPORTING DOCUMENTATION

- Document 1- Missing Persons Form 7

CONCLUSION

The OPS is committed to upholding the highest standards of compliance, oversight, and operational efficiency in accordance with the Community Safety and Policing Act (CSPA) and Ontario's regulations. Through internal audits, policy development, risk assessments, and performance monitoring, the OPS ensures adherence to legislative requirements and aligns with best practices in policing.

In line with the CSPA, OPS is focused on enhancing transparency, accountability, and public trust. The service remains dedicated to addressing emerging challenges, optimizing resources, and strengthening its governance framework to support safe, effective, and community-centred policing.

Moving forward, OPS will continue to refine its Quality Assurance function, collaborate with external oversight bodies, and ensure full compliance with regulatory standards. Additionally, the Service will work closely with the Executive Director and Finance and Audit Committee Chair to enhance reporting on internal audit and quality assurance activities, ensuring alignment with Board expectations. These efforts will position OPS as a trusted, efficient, and accountable organization, responsive to community needs and evolving legislative expectations. OPS is committed to becoming a valued partner in building an inclusive, equitable, and safe Ottawa.