

**Report to / Rapport a:**

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

**28 April 2025 / 28 avril 2025**

**Submitted by / Soumis par:**

**Chief of Police, Ottawa Police Service / Chef de police, Service de police d'Ottawa**

**Contact Person / Personne ressource:**

**Superintendent Robert Drummond, Executive Officer to the Chief of Police**

**Commissaire de police / Fonctionnaire exécutif**

**DrummondR@ottawapolice.ca**

**SUBJECT: COMPLAINTS REPORT – POLICE SERVICES ACT, COMMUNITY SAFETY AND POLICING ACT AND SPECIAL INVESTIGATIONS UNIT ACT: FIRST QUARTER 2025**

**OBJET: RAPPORT SUR LES PLAINTES – LOI SUR LES SERVICES POLICIERS, LOI SUR LA SECURITE COMMUNAUTAIRE ET LES SERVICES POLICIERS ET LOI SUR L'UNITE DES ENQUETES SPECIALES: PREMIER TRIMESTRE 2025**

**REPORT RECOMMENDATIONS**

**That the Ottawa Police Service Board receive 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**

On April 1, 2024, the Community Safety and Policing Act (CSPA), 2019 came into force in the Province of Ontario and replaced the previous Police Services Act (PSA), 1990. This new legislative framework was established to enhance community safety, improve policing practices and foster collaboration between police services and the communities they serve.

As part of the CSPA, a new Code of Conduct for police officers has been introduced under O. Reg. 407/23. The new Code of Conduct includes modernized language, additional

categories of offences, including, both new offences and defences. In addition, a Code of Conduct has now been established for all Special Constables under O. Reg. 41/23.

### **Complaints Procedures**

Under the CSPA, the Office of the Independent Police Review Director (OIPRD), who previously oversaw and processed all public complaints about a police service's policies, services, or the conduct of its members, has been renamed the Law Enforcement Complaints Agency (LECA) and is now led by the Complaints Director. As part of their new mandate, the LECA will only deal with conduct complaints against police officers. In addition, the LECA has the authority to investigate complaints about Chiefs and Deputy Chiefs and public interest complaints, including initiating an investigation into a police conduct, even if there is no public complaint.

All conduct complaints made by members of the public against police officers continue to be made to the LECA; however, allegations of misconduct occurring after April 1, 2024, will be assessed against the new police officer Code of Conduct under CSPA O. Reg. 407/23. The LECA may direct the officer's Chief of Police or the Chief of Police of an unrelated police service to investigate the complaint or, alternatively, retain the complaint and cause it to be investigated by a LECA investigator. Investigative results are reported to the LECA, who may overturn the findings, following a request for a review made to the Complaints Director by the complainant.

Under the CSPA, the LECA may refuse to investigate complaints if:

- The incident occurred more than six months before the complaint,
- The complainant was not directly affected by the incident,
- The conduct does not constitute misconduct, or
- The complaint is frivolous, vexatious, or not in the public interest.

Complaints filed before April 1, 2024, will continue to be processed under the PSA.

Chiefs of Police are also now required to provide notice of misconduct to the LECA when they become aware that a member of their police service, who is a police officer, other than a Deputy Chief, may have engaged in conduct that constitutes misconduct.

### **Inspector General's Role**

Part VII of the CSPA establishes the position of the Inspector General (IG), supported by the Inspectorate of Policing (IoP), whose mandate is to provide CSPA compliance oversight and enforcement of legal obligations for municipal police services, Chiefs of Police and boards. Such duties and authorities possessed by the IG and executed by the IoP include, advising, monitoring, issuing directions, imposing measures, conducting inspections of police services, investigating and overseeing certain types of complaints from the public. Policy and Service complaints that occurred after April 1, 2024, will now be dealt with by the IoP and classified, as follows:

- Adequacy and effectiveness of policing (formerly a service complaint);
- Failure of a police service board, Chief of Police, or prescribed policing provider to comply with the CSPA and its regulations, including systemic failure; and
- Procedures of a Chief of Police (formerly a policy complaint).

### **Internal Complaints**

Internal Complaints (or Chief's Complaints) are initiated at the discretion of the Chief of Police for allegations of officer misconduct or non-compliance with OPS policies and may also include matters that began as a public complaint. Internal Complaints also include driving related conduct matters. Motor Vehicle Collisions (MVC), Red Light Cameras (RLC) and Automated Speed Enforcement Cameras (ASE), which make up most Internal Complaint investigations.

The PSA allows for Public and Internal conduct complaints to be finalized as substantiated or unsubstantiated. Once substantiated, they are resolved by Informal Resolution, Informal Discipline, or Formal Discipline according to the circumstances and seriousness of the misconduct.

### **Complaints Outcome under the CSPA**

Under the CSPA, there is no distinction between misconduct of a less serious or serious nature. Once a determination of misconduct has been made, under section 200 of the CSPA, Chiefs can impose discipline, other than a demotion or dismissal, without a hearing, unless an officer requests one.

Matters requiring a hearing, will now be conducted by an independent adjudicator appointed by the Ontario Police Arbitration and Adjudication Commission (OPAAC), rather than a hearing officer appointed by the Chief.

### **Impact of Changes in Complaint Classification**

The introduction of O. Reg. 407/23 under the CSPA has changed how the officer conduct complaints are categorized and counted. The new regulation includes broader categories such as Compliance with Laws, Human Rights and Charter Rights, Interaction with the Public, and Integrity and Performance of Duties, capturing a wider range of behaviors compared to the previous framework under the PSA.

Due to these expanded categories, complaint numbers under the CSPA cannot be directly compared to those recorded under the PSA.

This report aims to provide transparency around the new complaint classifications and highlights the importance of interpreting comparisons between CSPA and PSA frameworks cautiously. The report also compares current complaint data with the same quarter from the previous year and five-year averages.

## DISCUSSION

### Complaints Statistics for Q1 2025

A total of 214 Public and Internal complaints were received in Q1 2025. Of these complaints, 23 (11%) were classified under the PSA for incidents before April 1, 2024, while 191 (89%) were classified under the CSPA.

#### Key Statistics:

- Public Complaints: 89 in Q1 2025, an 8% increase from 82 in Q1 2024.
- Internal Complaints: 125 in Q1 2025, a 7% increase from 117 in Q1 2024.

Table 1A (below) compares complaints in Q1 2025 to Q1 2024 and the five-year average.

**Table 1 - New Public and Internal Complaints Received in Q1**

	<b>Q1 2025</b>	<b>Q1 2024</b>	<b>5 YR AVG Q1</b>	<b>2024 Total</b>
Public Complaint (Conduct)	87	78	121	275
Public Complaint (Policy or Service - LECA)	1	4	26	8
Public Complaint (Policy or Service - IoP)	1	0	1	7
Internal Complaints (Other)	4	5	8	21
Internal Complaints (Red Light Camera Infractions)	23	12	18	100
Internal Complaints (MVCs)	29	25	26	93
Internal Complaints (ASEs)	69	75	47	570
<b>TOTAL</b>	<b>214</b>	<b>199</b>	<b>247</b>	<b>1074</b>

### Public Complaint Investigations

Of the 89 public complaints received by LECA and the IoP in Q1 2025:

- 33 were referred to OPS Professional Standards Unit for investigation.
- 1 was withdrawn by a complainant prior to being screened by the LECA.
- 54 were screened out by LECA.
- 1 was retained by the IoP for investigation.

The LECA did not retain any complaints for their own investigation in Q1 2025.

Table 2 provides further details on public complaint investigations for Q1 2025.

**Table 2 – Public Complaint Investigations in Q1 after Screening by the LECA and the IoP**

	Q1 2025	Q1 2024	5 YR AVG Q1	2024 Total
<b>Public Complaint (Conduct)</b>	32	25	49	104
<b>Public Complaint (Policy or Service - LECA)</b>	1	4	24	8
<b>Public Complaint (Policy or Service - IoP)</b>	1	n/a	1	7
<b>TOTAL</b>	<b>34</b>	<b>29</b>	<b>74</b>	<b>119</b>

### Classification of Officer Conduct Complaints

Officer conduct complaints are classified based on the date the incident occurred, following distinct frameworks for pre- and post-April 1, 2024, incidents.

**Pre-April 1, 2024 Complaints:** Complaints related to officer conduct occurring before April 1, 2024, are classified under the Police Services Act (PSA). In Q1 2025, a total of 22 complaints (10% of all conduct complaints) were classified under the PSA, categorized as follows:

1. Improper Conduct (including Driving-Related Conduct): 10 complaints
2. Excessive Force: 4 complaints
3. Neglect of Duty: 8 complaints

These numbers reflect complaints related to incidents that occurred before the CSPA came into force.

**Post-April 1, 2024 Complaints:** Complaints regarding conduct occurring on or after April 1, 2024, are classified under the Community Safety and Policing Act (CSPA). A total of 190 complaints (90% of all conduct complaints) were classified under the CSPA in Q1 2025, distributed across the following categories:

1. Compliance with Laws: 2 complaints
2. Human Rights and Charter Rights: 2 complaints
3. Interaction with the Public: 48 complaints
4. Performance of Duties (including Driving-Related Conduct): 138 complaints, with 121 of these being related to driving.

Table 3A below illustrates, the total number of Public and Internal complaints dealing with officer conduct in Q1 2025 under the PSA.

**Table 3A – PSA Conduct Related Complaints by Category in Q1 before Screening of Public Complaints by the LECA**

	<b>Q1 2025</b>	<b>Q1 2024</b>	<b>5 YR AVG Q1</b>	<b>2024 Total</b>
<b>Improper Conduct</b>	10	60	79	111
<b>Improper Conduct – Driving Related</b>	0	112	67	172
<b>Excessive Force</b>	4	6	17	12
<b>Neglect of Duty</b>	8	17	19	62
<b>Firearm Discharge</b>	0	0	0	0
<b>TOTAL</b>	<b>22</b>	<b>195</b>	<b>182</b>	<b>357</b>

Table 3B below illustrates, the total number of Public and Internal complaints dealing with officer conduct in Q1 2025 under the CSPA.

**Table 3B – CSPA Conduct Related Complaints by Category in Q1 before Screening of Public Complaints by the LECA**

	<b>Q1 2025</b>	<b>Q1 2024</b>	<b>5 YR AVG Q1</b>	<b>2024 Total</b>
<b>Performance of Duties</b>	17	n/a	n/a	33
<b>Performance of Duties – Driving Related</b>	121	n/a	n/a	591
<b>Compliance with Laws</b>	2	n/a	n/a	2
<b>Human Rights and Charter Rights</b>	2	n/a	n/a	4
<b>Interaction with Public</b>	48	n/a	n/a	68
<b>Integrity</b>	0	n/a	n/a	4
<b>TOTAL</b>	<b>190</b>	<b>n/a</b>	<b>n/a</b>	<b>702</b>

Table 4A (below) outlines the total number of Conduct related Public and Internal complaints that were investigated in Q1 2025 under the PSA, after Public complaint screen-outs by the LECA, including a comparison to Q1 2024, the five-year average for the same quarter and the total complaints investigated in 2024. The Q1 2025 total is 6, as compared to 142 in Q1 2024 or a 96% decrease.

**Table 4A – PSA Conduct Related Complaint Investigations in Q1 after Screening by the LECA**

	<b>Q1 2025</b>	<b>Q1 2024</b>	<b>5 YR AVG Q1</b>	<b>2024 Total</b>
<b>Improper Conduct</b>	3	13	18	35
<b>Improper Conduct – Driving Related</b>	0	112	66	172
<b>Excessive Force</b>	1	4	4	9
<b>Neglect of Duty</b>	2	13	9	36
<b>Firearm Discharge</b>	0	0	0	0
<b>TOTAL</b>	<b>6</b>	<b>142</b>	<b>97</b>	<b>252</b>

Table 4B (below) outlines the total number of Conduct related Public and Internal complaints that were investigated in Q1 2025 under the CSPA, after Public complaint screen-outs by the LECA. The Q1 2025 total for complaints investigated is 151.

**Table 4B – CSPA Conduct Related Complaint Investigations in Q1 after Screening by the LECA**

	<b>Q1 2025</b>	<b>Q1 2024</b>	<b>5 YR AVG Q1</b>	<b>2024 Total</b>
<b>Performance of Duties</b>	11	n/a	n/a	n/a
<b>Performance of Duties – Driving Related</b>	121	n/a	n/a	n/a
<b>Compliance with Laws</b>	0	n/a	n/a	n/a
<b>Human Rights and Charter Rights</b>	1	n/a	n/a	n/a
<b>Interaction with Public</b>	18	n/a	n/a	n/a
<b>Integrity</b>	0	n/a	n/a	n/a
<b>TOTAL</b>	<b>151</b>	<b>n/a</b>	<b>n/a</b>	<b>n/a</b>

#### Key Driver of Increased Internal Complaints

The key driver of the increase in Driving Related Internal Complaints is attributed to the number of Automated Speed Enforcement, which continues to rise with the implementation of more cameras throughout the City. As such, the OPS Complaint Statistics report to the Board now includes a category to distinguish Driving Related Conduct from other forms of Improper Conduct. In 2021, the OPS updated its process to deal with camera infractions to hold members accountable and apply progressive

discipline when the threshold for exemption under the Ontario Highway Traffic Act (HTA) are not met.

### **LECA Mandatory Notice of Misconduct and Investigations**

Section 197(1) of the CSPA, requires a Chief of Police to notify the LECA when it is reasonably suspected that an officer's conduct constitutes misconduct, as set out in "Discipline O. Reg. 406/23" and the conduct was either directed at or directly affected a member of the public, who would be permitted to make a complaint to the LECA.

All notifications are reviewed by the LECA and a decision is made on whether an investigation will be initiated in the public interest.

In Q1 2025, three notifications were provided to the LECA. In two of these notifications, the LECA determined that it would not in the public interest for them to initiate an investigation in the absence of a Public complaint, while the third notification remained outstanding at the end of Q1 2025.

### **Special Constable Complaints**

The conduct of special constables is now governed by O. Reg. 411/23 under the CSPA.

O. Reg. 411/23 requires that all external complaints about special constables be made to the Service in which the special constable is employed. Complaints against special constables shall be investigated by the Chief of Police to determine whether the special constable's conduct constitutes misconduct, contravened the terms and conditions of the special constable's certificate of appointment or contravened any provision of the CSPA or its regulations. All discipline matters relating to special constables are governed by the Civilian Personnel Collective Agreement.

There were no special constable complaints received in Q1 2025.

### **Service or Policy Complaints**

There was one Service related Public complaint received under the PSA from the LECA in Q1 2025. The details of this complaint, which resulted in no further action, are attached to this report (Document 1).

There was one Service related Public complaint received under the CSPA from the IOP in Q1 2025. This investigation being conducted by the IOP, remains ongoing. The results of the IOP's findings will be provided in a future report, within the quarter they complete their investigation.

Table 7 (below) outlines the total number of Service and Policy complaints received in Q1 2025 as compared to Q1 2024, as well as the Q1 five-year average.

**Table 7 - Policy and Service Complaints**

	<b>Q1 2025</b>	<b>Q1 2024</b>	<b>5 YR AVG Q1</b>	<b>2024 Total</b>
<b>Policy (LECA)</b>	0	0	0	0
<b>Service (LECA)</b>	1	4	25	8
<b>Policy (IoP)</b>	0	0	n/a	0
<b>Service (IoP)</b>	1	0	n/a	7
<b>TOTAL</b>	<b>2</b>	<b>4</b>	<b>25</b>	<b>15</b>

Table 8 (below) outlines Service or Policy complaints referred for investigation in Q1 2025 compared to Q1 2024, as well as the five-year average for the same quarter and the total number of policy and service complaints investigated in 2024.

**Table 8 - Policy and Service Complaint Investigations**

	<b>Q1 2025</b>	<b>Q1 2024</b>	<b>5 YR AVG Q1</b>	<b>2024 Total</b>
<b>Policy (LECA)</b>	0	0	0	0
<b>Service (LECA)</b>	1	4	17	8
<b>Policy (IoP)</b>	0	0	n/a	0
<b>Service (IoP)</b>	1	0	n/a	7
<b>TOTAL</b>	<b>2</b>	<b>4</b>	<b>17</b>	<b>15</b>

### **The LECA's Early Resolution Program (ERP)**

In July 2020, the LECA advised that they would be streamlining early resolution processes in anticipation of changes under the CSPA. By the end of 2020, the LECA introduced the Early Resolution Program (ERP), which provides an opportunity for complainants and respondent officers to voluntarily resolve a complaint before it is formally screened in for investigation. To proceed by way of ERP, the complainant, the respondent officer(s), and the police service must agree to this option. If they do not agree to this option, the complaint is returned to the screening process, and it is either screened in for investigation or screened out by the LECA.

In Q1 2025, six ERP files were received from the LECA. Two files were concluded after resolutions were reached, one was withdrawn by the complainant, while the remaining three were outstanding at the end of Q1 2025.

### Conduct Complaint Status

The following summarizes the status of the 212 Conduct related Public and Internal complaints that were received or generated in Q1 2025.

- cases completed
  - 11 resulted in Section 200 discipline – no hearing (all resulting from driving related complaints)
  - 7 withdrawn by the complainant
  - 1 withdrawn by the complainant prior to screening by the LECA
  - 2 resulted in informal resolution
  - 54 screened-out by the LECA after being determined to be frivolous, vexatious, over six months after the facts on which it was based occurred, better dealt with under Act or Law, third party- no interest or not in the public interest to proceed.
  - 4 were terminated by the LECA after being referred for investigation.
  - 60 were unsubstantiated or resulted in no further action (all resulting from driving related complaints)
  - 73 investigations are ongoing (this includes 50 driving related complaints)

Table 9 (below) illustrates the Q1 2025 complaint status for Conduct related Public and Internal complaints, including a comparison with Q1 2024 and the five-year average for the same quarter:

**Table 9 - Complaint Status - Conduct Complaints**

<b>RESOLUTION</b>	<b>Q1 2025</b>	<b>Q1 2024</b>	<b>5 YR AVG Q1</b>
No Further Action	60	81	56
Unsubstantiated	0	1	0
Vexatious/Frivolous/Bad Faith	5	7	6
Informal Resolution	2	0	0
Informal Resolution - Mediation	0	0	0
Withdrawn by Complainant	5	8	5

Withdrawn by Complainant through Mediation	2	4	4
Withdrawn Prior to Screening of Complaint	1	0	0
Terminated by the LECA after being referred for investigation	4	0	1
Over Six Months	0	1	1
Not in the Public Interest	39	33	70
Third Party - Not Directly Affected	8	6	3
Better Dealt with Under another Act or Law	0	3	1
No Jurisdiction – LECA	2	1	1
Conduct Does No Constitute Misconduct	0	0	0
<b>Complaints Not Resulting in Discipline Total</b>	<b>128</b>	<b>145</b>	<b>148</b>
Informal Discipline	0	7	6
Disciplinary Hearing (PSA)	0	0	0
Discipline (Section 200) – No Hearing (CSPA)	11	n/a	n/a
Demotion and Termination Hearing (CSPA)	0	n/a	n/a
<b>Complaints Resulting in Discipline total</b>	<b>11</b>	<b>7</b>	<b>9</b>
<b>Complaints Outstanding total</b>	<b>73</b>	<b>43</b>	<b>62</b>
<b>TOTAL</b>	<b>212</b>	<b>195</b>	<b>219</b>

### Disciplinary Measures under the CSPA

Section 215 under CSPA requires that a Chief of Police shall report, in accordance with O.Reg. 90/24, to the Police Services Board certain information respecting disciplinary measures taken under Part XII of the Act.

In Q1 2025, disciplinary measures were imposed 11 times. These disciplinary measures can be broken down as follows:

- In all 11 cases, discipline was imposed without a hearing under section 201 of the Act;
- In all 11 cases, the misconduct involved performance of duties (all driving related);
- Counselling was imposed in 8 of these cases;
- A forfeiture of time and counselling was imposed in 3 of these cases. The average forfeiture of time was 8 hours and the total hours forfeited was 24.

In Q1 2025, disciplinary measures were imposed times

### Member Suspensions

Both the PSA and CSPA provide that a Chief of Police, in the most serious of matters, can suspend a police officer. Suspensions are treated very seriously and only occur after a careful assessment of the case and any risk factors that may be present.

The CSPA now enables a Chief of Police to suspend an officer without pay when they are convicted and sentenced to jail, in custody or subject to bail that substantially interferes with their policing duties and/or charged with an off duty indictable offence under the Criminal Code, the Controlled Drugs and Substances Act or the Cannabis Act.

There were no officers suspended in Q1 2025, compared to two officer suspensions in Q1 2024 and a five-year Q1 average of one. At the start of Q1 2025, there were five officers on suspension, which decreased to four by the end of Q1 2025.

### Special Investigations Unit (SIU) Investigations

The Special Investigations Unit Act, 2019, authorizes the SIU to conduct criminal investigations into circumstances involving police where serious injury or death has occurred, a firearm discharge at a person or where there are allegations of sexual assault.

The Board receives a separate report on each SIU case in every instance where the investigation is concluded by a report from the SIU Director. The SIU invoked its mandate three times in Q1 2025. The investigations remain ongoing.

Table 10 (below) provides a comparator of SIU investigations between Q1 2025 and Q1 2024, as well as the five-year average for the same quarter.

**Table 10 - Special Investigations Unit Investigations**

<b>TYPES OF INVESTIGATIONS</b>	<b>Q1 2024</b>	<b>Q1 2025</b>	<b>5 YR AVG Q1</b>
<b>Death</b>	1	0	1
<b>Serious Injury</b>	2	1	2
<b>Sexual Assault</b>	0	1	1
<b>Discharge of Firearm at Person</b>	0	1	0
<b>TOTAL</b>	<b>3</b>	<b>3</b>	<b>4</b>

### Complaint Reviews

The PSA and CSPA provides that public complainants may seek a review of the Chief's decision on a conduct complaint received from the LECA. In Q1 2025, there were three requests for reviews, a decrease from six in Q1 2024.

**Service or Policy Complaint Reviews**

Under the PSA, complainants who are dissatisfied with the resolution of their Service or Policy complaint may seek a review by the Board. There were no requests for a Board review in Q1 2025.

**SUPPORTING DOCUMENTATION**

Document 1 - Summary of Policy and/or Service Complaints completed in Q1 2025

**CONCLUSION**

The OPS Professional Standards Unit strives to uphold the highest standards of conduct and accountability for its members. With the transition to the Community Safety and Policing Act (CSPA), the unit continues to handle complaints under the updated framework while addressing conduct issues fairly and efficiently. This commitment reinforces public trust and ensures that integrity remains at the core of policing.

**Document 1 – Summary of Policy and/or Service Complaints completed in Q1 2025**

**Service Complaint #:** 25-0014  
**Date of Incident:** 14 May 2023  
**Date Complaint Received:** 09 January 2025  
**Date Completed:** 13 February 2025

**Summary of Complaint:**

The complainant alleged that there was an inadequate response time in police providing a welfare check on his son, who was later found to be deceased.

**Summary of Findings and Actions Taken:**

The investigation determined that the OPS Communications Center appropriately prioritized the urgency of the call, but failed to notify a field supervisor or inform the caller about delays in dispatching. While the delayed response exceeded target times due to high call volume, limited staffing, resource-intensive incidents and other factors beyond the control of the Communications Center, the delay did highlight inadequate service caused by these oversights and non-adherence to response protocols.

In July of 2024, a new call type, "Check on Condition", was implemented in the OPS Computer system (CAD), which has more specific question prompts to improve call prioritization. This corrective action enhances the ability to assess the severity of wellness check calls, similar to the one that was subject to this complaint and is expected to improve response times and service efficiency.