

Report to:

POLICY & GOVERNANCE COMMITTEE

7 July 2025

Submitted by:

Executive Director, Ottawa Police Service Board / Directeur Exécutif, Commission de service de police d'Ottawa

Contact Person:

**Habib Sayah, Executive Director / Directeur Exécutif
habib.sayah@ottawa.ca**

SUBJECT: ROADMAP FOR THE MODERNIZATION OF THE MAJOR EVENTS POLICY FRAMEWORK

OBJET: FEUILLE DE ROUTE POUR LA MODERNISATION DU CADRE DE POLITIQUE SUR LES ÉVÉNEMENTS MAJEURS

REPORT RECOMMENDATIONS

That the Ottawa Police Service Board's Policy and Governance Committee approve the roadmap for the review of the Major Events policy framework as outlined in this report.

RECOMMANDATIONS DU RAPPORT

Que le Comité des politiques et de la gouvernance de la Commission de service de police d'Ottawa approuve la feuille de route pour la révision du cadre de politique sur les événements majeurs, telle que présentée dans le présent rapport.

SUMMARY

This report outlines a proposed roadmap for the modernization of the Ottawa Police Service Board's governance framework for major events. Rather than undertaking a routine review of the Board's current Major Events Policy (CR-17), the report recommends a phased development of an integrated framework composed of interrelated

policies. This approach is grounded in the Board's statutory responsibilities under the *Community Safety and Policing Act, 2019* (CSPA), and reflects lessons from recent oversight findings, including the Ottawa Auditor General's 2023 audit of the police response to the 2022 Convoy protest.

The proposed modernization would unfold in two stages. The first involves the development of a Critical Points Policy to clarify the Board's role and expectations when significant operational thresholds are crossed – work that would build upon and complement the recently adopted Policy CR-28 on assistance from external police services. The second phase involves the development of a human rights-based framework for the management of demonstrations. This phase is expected to require extensive public consultation, including engagement with residents, community organizations, subject matter experts, the Ottawa Police Service, and partner agencies.

The report also highlights the ongoing coordination with the City of Ottawa's Emergency and Protective Services on the proposed Vulnerable Social Infrastructure By-law. While distinct in scope and mandate, this municipal initiative intersects thematically with the Board's work, and the City has agreed to share consultation plans and findings. This collaboration allows the Board to focus its limited resources strategically and represents an important step in building the Board's long-term capacity for meaningful public engagement.

The roadmap set out in this report is intended to provide the Committee with a structured path forward.

BACKGROUND

The need to revise the Board's Major Events Policy (CR-17) arises from a confluence of oversight findings, legislative reforms, and community expectations that have significantly evolved since the policy's last review in 2017. In the intervening years, several high-profile reports and inquiries – both in Ottawa and across Ontario – have highlighted the need to modernize the policy framework governing major events and demonstrations.

In the Ottawa context, the most direct and urgent call for policy modernization came through Recommendation 1 of the Ottawa Auditor General's audit of the Ottawa Police

Service's response to the 2022 Convoy protest. Released in 2023, the audit recommended that the Board "review and update the Major Events policy and other related Board policies to clarify expectations on the collaboration between the Board and the Chief of Police and the dissemination of intelligence and sharing of operational plans during a major event." The Auditor General emphasized the need for the Board to be consulted early in the planning process – particularly in the development of mission, objectives, and priorities – and to be equipped with sufficient information to fulfill its oversight responsibilities. The audit suggested that what was required might not be a simple refresh of CR-17, but a broader review of the full governance framework for major events.

These findings are consistent with conclusions from other seminal reviews, including the Morden Report, the Epstein Report, and the Public Order Emergency Commission (POEC), which collectively emphasized the need for boards to have timely access to operational information, to set strategic-level objectives and priorities in advance of major events and other "critical points."

At its meeting on May 17, 2024, the Policy and Governance Committee heard a presentation from the Ottawa People's Commission, which included a recommendation that the Board adopt a human rights framework for the management of demonstrations. The Commission's recommendation reflected a growing consensus that police governance bodies must do more to ensure that the policing of protests is conducted in a manner consistent with constitutional standards and community expectations. The Committee expressed interest in this direction and asked Board staff to explore the development of such a framework.

Following the May 2024 meeting, Board staff began internal planning to scope out the work required for both the modernization of CR-17 and the potential development of a broader rights-based framework for demonstration management. Shortly thereafter, however, the Executive Director left the organization and the Senior Policy Advisor had to step into that role in an acting capacity for a protracted period. This significantly reduced the Board office's capacity to undertake a complex policy development project of this nature, with priority necessarily shifting to stabilizing the Board office and ensuring

business continuity. The Senior Policy Advisor position remained vacant until June 2025, when a new hire was made. While work on the Major Events framework never ceased, it was unavoidably stalled.

Despite these constraints, incremental progress was made. A foundational piece of the proposed framework – Policy CR-28, *Assistance in the Provision of Policing* – was adopted by the Board in October 2024, with further amendments introduced in June 2025 to incorporate the concept of “Critical Points.” This work was necessary to bring the Board into closer alignment with the *Community Safety and Policing Act, 2019* (CSPA) and with the expectations articulated by the Inspector General of Policing.

With staffing levels now stabilized and internal capacity restored, the Board office is in a position to intensify this work. The present report responds to the Committee’s earlier direction by outlining a proposed roadmap for that work, and invites the Committee’s input on the scope, structure, and sequencing of the proposed next steps.

DISCUSSION

A Proposed Two-Step Approach to Modernizing the Major Events Policy Framework

This report outlines a phased approach to the modernization of the Board’s governance of major events, recognizing that what is needed is not a routine revision of Policy CR-17, but the development of an integrated policy framework composed of interlocking policies that will be developed and adopted sequentially. Grounded in the Board’s responsibilities under the CSPA and shaped by recent oversight findings at all levels of government, this approach would begin by putting in place the foundational policies needed to meet legal and compliance requirements, and then continue with the development of a human rights-based framework for demonstrations through structured public consultation. Taken together, these interdependent policies are intended to equip the Board with a coherent, modernized toolkit to govern major events in Ottawa.

The first step toward implementing this broader vision was taken with the adoption of Policy CR-28 *Assistance in the Provision of Policing*, on October 28, 2024. Although not exclusive to major events, CR-28 addressed the use of external assistance – a practice

frequently invoked in the context of major events in Ottawa – and established clearer expectations regarding the Chief’s obligations to notify and inform the Board. On June 23, 2025, CR-28 was amended to introduce the concept of “Critical Points,” though in a limited scope applicable only to temporary assistance scenarios.

The present proposal recommends that the next policy instrument in this evolving framework be a stand-alone Critical Points Policy, which would expand upon the concept introduced in CR-28 and formalize Board oversight at key operational thresholds. The rationale for this policy is set out in the March 2025 advisory memorandum from the Inspector General, which identifies a gap in how Boards engage when significant public safety or operational thresholds are crossed. A Critical Points Policy would define when enhanced information-sharing and governance measures are triggered, and would clarify the Board’s role in shaping operational objectives, consistent with Justice Morden’s recommendation.

Should the Committee support this direction, a draft Critical Points Policy will be brought forward for review at its September 5, 2025 meeting, with the intent of seeking Board adoption at its September 29, 2025 meeting. If approved, this policy would directly respond to the only outstanding recommendation from the Auditor General’s Convoy audit.

In parallel, the Board office is proposing to pursue the development of a human rights-based framework for managing demonstrations. This proposal arises from the Committee’s previously expressed interest in better articulating the Board’s expectations regarding the balance between protestors’ rights and the rights of residents, bystanders, and other affected groups. Developing such a framework is inherently more complex than the first phase of modernization, and would require careful, inclusive consultation.

The CSPA’s guiding principles provide a clear statutory foundation for this approach. Section 1 of the Act emphasizes the importance of safeguarding Charter rights and responsiveness to the needs of Ontario’s pluralistic and multicultural communities. In addition, section 2 of Ontario Regulation 392/23, which sets out the Generally Applicable Standard for adequate and effective policing, underscores the importance of taking into consideration community needs, demographic context, and best practices when a police

service board defines adequacy standards in a particular area. Taken together, these provisions support the development of a policy framework grounded in meaningful public consultation that not only upholds constitutional and human rights but also ensures that the Service's approach to managing demonstrations aligns with public expectations.

For these reasons, the Board Office anticipates that this phase would require the most extensive public engagement ever undertaken by the Board. Engagement would involve residents, community organizations, subject-matter experts, and the Ottawa Police Service, whose operational insights will be essential.

Finally, it should be noted that the Inspector General of Policing recently released a Spotlight Report on Public Order Units (POUs). That report, which is currently under review by Board staff, includes recommendations regarding the governance of POUs and the role of Police Liaison Teams (PLTs). While Board staff are still determining whether this report will have implications for the Major Events framework, the outcome of the review will determine whether any adjustments to the scope of work are required.

Coordination with the City's Emergency and Protective Services

The review of the Board's Major Events Policy is unfolding in parallel with a significant policy initiative undertaken by the City of Ottawa: the development of a Vulnerable Social Infrastructure By-law. This proposed municipal by-law, also referred to in some jurisdictions as a "bubble zone" by-law, is intended to prevent harassment and hate-motivated behaviour around sensitive community sites such as places of worship, child care centres, schools, hospitals, and congregate care facilities. The initiative emerged in response to incidents that have raised serious concerns about the safety and well-being of individuals using these spaces, and seeks to create safer conditions without unduly restricting Charter-protected protest rights.

The City's Information Previously Distributed (IPD) report, dated May 15, 2025, highlights the complexity and constitutional sensitivity of such a by-law. It notes the need for further research, stakeholder engagement, and legal analysis before any regulatory instrument can be finalized. Staff have recognized that the success and legitimacy of such a by-law depend on its ability to withstand legal scrutiny, particularly under the Canadian Charter

of Rights and Freedoms, and on its alignment with broader public interest objectives, including proportionality and minimal impairment of fundamental freedoms. Importantly, the IPD also confirms that the Ottawa Police Service is expected to play a primary role in enforcing any eventual by-law. The legal, operational, and human rights questions at play therefore intersect directly with the issues under consideration by the Board in its own Major Events policy review.

In recognition of this convergence, the Board office has initiated discussions with the City's Emergency and Protective Services Department, specifically with the Public Policy Development Services team. These discussions have led to a collaborative approach centered on mutual consultation and information-sharing. The City has confirmed that it will begin public consultations on the proposed by-law in September 2025 and has agreed to keep the Board office informed in advance of the design and scope of these consultations, including any surveys or commissioned research. This will allow the Board to identify opportunities to align its own engagement processes, avoid duplication, and focus its limited resources on areas not already addressed through the City's outreach. The City has also agreed to share the results of its consultations and background research with the Board office and has expressed openness to including, where appropriate, questions submitted by the Board as part of its public consultation tools.

This arrangement is of particular value to the Board at a time when it is building its internal capacity for public consultation. The recruitment of a Communications and Community Engagement Advisor, currently underway, will eventually provide the Board with dedicated in-house expertise in this area. In the meantime, however, the ability to leverage the City's existing infrastructure and resources represents a practical and efficient way to ensure that community perspectives inform the development of the new Major Events Policy.

This coordination does not imply endorsement of the proposed Vulnerable Social Infrastructure By-law, nor does it alter the distinct roles and responsibilities of the Board and the City in their respective areas of jurisdiction. The Board's oversight mandate under the CSPA remains distinct from the City's regulatory authority under the Municipal Act. While both bodies have an interest in ensuring that protests do not infringe on the rights

or safety of others, and while both are committed to upholding the Constitution – including the fundamental freedoms of expression, association, and peaceful assembly – their roles are not interchangeable. This collaboration should be understood as a practical and effort to coordinate complementary workstreams, while respecting the distinct mandates and decision-making authority of each body.

The consultations and research led by the City are expected to explore themes that are central to the Board’s policy work, including the balancing of protest rights with the rights and dignity of residents, the role of police discretion in enforcement, and the legal boundaries of acceptable protest conduct. For these reasons, the findings of the City’s process are likely to provide valuable insights for the Board’s own policy development efforts. Ongoing coordination between the two teams will also help prevent jurisdictional conflict and ensure that any future by-law or policy developed by either party is coherent with the other’s respective authority.

CONSULTATION

The development of the proposed policies – particularly the human rights-based framework for the management of demonstrations – will require extensive and inclusive consultation with a wide range of stakeholders. These consultations are critical to ensuring that the resulting framework is both operationally sound and reflective of the rights, needs, and expectations of the diverse communities served by the Ottawa Police Service. The Board office plans to engage:

- Residents and community associations
- Civil liberties and human rights organizations
- Legal experts and academic researchers
- Equity-deserving groups
- Organizers of demonstrations across the political spectrum
- Business improvement areas (BIAs)
- Social service providers
- The Community Equity Council
- The Ottawa Police Service
- The City of Ottawa’s Emergency and Protective Services

- Members of the Big 12 police service boards
- Members of the Canadian Association of Police Governance (CAPG)
- The Canadian Association of Chiefs of Police

This broad consultation process will help ensure that the framework is grounded in local realities while benefiting from provincial and national insights.

The successful modernization of the Board's Major Events framework, including the development of a new Critical Points policy, requires a high degree of sustained collaboration between the Board office and the Ottawa Police Service.

To support this objective, it has been agreed that a dedicated bilateral working group will serve as the principal forum for structured consultation between the Board office and the Service. This working group brings together the Board office with the OPS Executive Director of Strategy and Communications and the lead for the Service's CSPA Compliance Project.

Progress against the proposed roadmap will rely heavily on continued collaboration with the Ottawa Police Service. In particular, the meaningful involvement of operational leads at key stages of the consultation process will be essential. Their insights are critical to assessing the practical implications of proposed policy and to identifying potential implementation challenges early in the process.

FINANCIAL IMPLICATIONS

The financial impact of the proposed roadmap is expected to be manageable within the Board's existing budget envelope. Recognizing that the Board is still in the process of building its internal public engagement capacity, consultations will be strategically sequenced to ensure they are appropriately resourced. A strong emphasis will be placed on leveraging the consultation infrastructure and research capacity of partner organizations, notably the City of Ottawa, to minimize duplication and enhance value for money.

At this stage, the full extent of resource requirements – particularly for the development of the human rights-based framework – remains to be determined. As discussions with City staff advance and further clarity is gained regarding the scope and methodology of the City's planned consultation processes, the Board office will be better positioned to identify potential gaps. These gaps may be addressed through internal capacity or supplemented with external support such as facilitation services or commissioned research.

It is also worth noting that the Board's Professional Services budget is currently significantly underspent, and resources are available to support this initiative as it progresses through its key phases.

CONCLUSION

The complexity of major events in Ottawa demands more than a routine policy review. It calls for a comprehensive, modernized framework that equips the Board with necessary tools to exercise its oversight role effectively, in line with its statutory mandate and informed by past experience.

The proposed roadmap offers a clear path forward: beginning with foundational governance tools to meet immediate compliance needs, and moving toward a broader, rights-based approach to demonstration management developed through meaningful consultation. With internal capacity stabilized and key relationships in place, the Board is now well positioned to proceed.

SUPPORTING DOCUMENTATION

Document 1 – Roadmap for the Modernization of the Major Events Policy Framework

DOCUMENT 1 – Roadmap for the Modernization of the Major Events Policy Framework

The following roadmap outlines a phased approach to the development of an integrated policy framework governing major events:

- 1. Policy CR-28 – Assistance in the Provision of Policing**

Status: Completed

Adopted in October 2024 and amended in June 2025, this policy established governance expectations related to the use of external policing assistance and introduced the concept of “Critical Points.”

- 2. Critical Points Policy**

Timeline: September 2025

A new policy to define the thresholds at which enhanced information-sharing and oversight measures are triggered, including amendments to Policy CR-17 *Major Events* to ensure alignment.

- 3. Human Rights-Based Framework for Demonstration Management**

Timeline: Q2 2026

A comprehensive policy instrument developed through extensive public consultation, intended to clarify the Board’s expectations regarding the policing of demonstrations in a manner that respects Charter rights, community safety, and public expectations.

This roadmap is intended to remain flexible and responsive to emerging oversight guidance, operational realities, and community input.