

Report to / Rapport a:

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

28 July 2025 / 28 juillet 2025

Submitted by / Soumis par:

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**SUBJECT: COMPLAINTS REPORT – POLICE SERVICES ACT, COMMUNITY
SAFETY AND POLICING ACT AND SPECIAL INVESTIGATIONS UNIT
ACT: SECOND 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:
DEUXIÈME TRIMESTRE DE 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 where allegations occurred 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. 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); and
- Failure of a police service board, Chief of Police, or prescribed policing provider to comply with the CSPA and its regulations, including systemic failure.

Complaints related to the procedures established by the Chief of Police (formerly a policy complaint), shall be forwarded to the police service board that maintains the police service by the IG and review and the complaint as it relates to the policies and report back to the IG about steps taken in response to the 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. While there are now only five prescribed misconduct categories - *Compliance with Laws, Human Rights and Charter, Interactions with the Public, Integrity and Performance of Duties* – these are broader in scope than the former categories under the PSA. As a result, a wider range of behaviors may be captured within each category, even though the number of categories is fewer.

Due to these broader definitions, complaint totals under the CSPA cannot be directly compared to those recorded under the PSA, as similar incidents may now fall within a single, more inclusive category.

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 Q2 2025

A total of 244 Public and Internal complaints were received in Q2 2025. Of these complaints, 22 (9%) were classified under the PSA for incidents before April 1, 2024, while 222 (91%) were classified under the CSPA.

Key Statistics:

- Public Complaints (Conduct): 90 in Q2 2025, a 30% increase from 69 in Q2 2024.
- Internal Complaints: 148 in Q2 2025, a 30% decrease from 211 in Q2 2024.

Table 1A (below) compares complaints in Q2 2025 to Q2 2024 and the five-year average.

Table 1 - New Public and Internal Complaints Received in Q2

	Q2 2025	Q2 2024	5 YR AVG Q2	2024 Total
Public Complaint (Conduct)	90	69	88	275
Public Complaint (Policy or Service - LECA)	0	4	7	8
Public Complaint (Service - IoP)	6	0	6	7
Internal Complaints (Other)	8	8	7	21
Internal Complaints (Red Light Camera Infractions)	18	23	18	100
Internal Complaints (MVCs)	21	15	20	93
Internal Complaints (ASEs)	101	165	65	570
TOTAL	244	284	211	1074

Public Complaint Investigations

Of the 96 public complaints received by LECA and the IoP in Q2 2025:

- 21 were referred to OPS Professional Standards Unit for investigation.
- 69 were screened out by the LECA.
- 6 were retained by the IoP for investigation.

The LECA did not retain any complaints for their own investigation in Q2 2025.

Table 2 provides further details on public complaint investigations for Q2 2025.

Table 2 – Public Complaint Investigations in Q2 after Screening by the LECA and the IoP

	Q2 2025	Q2 2024	5 YR AVG Q2	2024 Total
Public Complaint (Conduct)	21	32	31	104
Public Complaint (Policy or Service - LECA)	0	4	5	8
Public Complaint (Policy or Service - IoP)	6	0	6	7
TOTAL	27	36	42	119

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 Q2 2025, a total of 22 complaints (9% of all conduct complaints) were classified under the PSA, categorized as follows:

1. Improper Conduct: 8 complaints
2. Neglect of Duty: 14 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 216 complaints (91% of all conduct complaints) were classified under the CSPA in Q2 2025, distributed across the following categories:

1. Human Rights and Charter Rights: 3 complaints
2. Interaction with the Public: 53 complaints
3. Integrity: 2 complaints
4. Performance of Duties (including Driving-Related Conduct): 158 complaints, with 140 of these being related to driving.

Table 3A below illustrates, the total number of Public and Internal complaints dealing with officer conduct in Q2 2025 under the PSA.

Table 3A – PSA Conduct Related Complaints by Category in Q2 before Screening of Public Complaints by the LECA

	Q2 2025	Q2 2024	5 YR AVG Q2	2024 Total
Improper Conduct	8	33	52	111
Improper Conduct – Driving Related	0	50	40	172
Excessive Force	0	4	7	12
Neglect of Duty	14	18	20	62
Firearm Discharge	0	0	0	0
TOTAL	22	105	119	357

Table 3B below illustrates, the total number of Public and Internal complaints dealing with officer conduct in Q2 2025 under the CSPA.

Table 3B – CSPA Conduct Related Complaints by Category in Q2 before Screening of Public Complaints by the LECA

	Q2 2025	Q2 2024	2 YR AVG Q2	2024 Total
Performance of Duties	18	11	15	33
Performance of Duties – Driving Related	140	108	124	590
Compliance with Laws	0	1	1	2
Human Rights and Charter Rights	3	1	2	4
Interaction with Public	53	9	31	68
Integrity	2	0	1	4
TOTAL	216	130	174	701

Table 4A (below) outlines the total number of Conduct related Public and Internal complaints that were investigated in Q2 2025 under the PSA, after Public complaint screen-outs by the LECA, including a comparison to Q2 2024, the five-year average for the same quarter and the total complaints investigated in 2024. The Q2 2025 total is 2, as compared to 78 in Q2 2024 or a 97% decrease.

Table 4A – PSA Conduct Related Complaint Investigations in Q2 after Screening by the LECA

	Q2 2025	Q2 2024	5 YR AVG Q2	2024 Total
Improper Conduct	0	12	20	35
Improper Conduct – Driving Related	0	50	40	172
Excessive Force	0	4	3	9
Neglect of Duty	2	12	10	36
Firearm Discharge	0	0	0	00
TOTAL	2	78	73	252

Table 4B (below) outlines the total number of Conduct related Public and Internal complaints that were investigated in Q2 2025 under the CSPA, after Public complaint screen-outs by the LECA. The Q2 2025 total for complaints investigated is 166.

Table 4B – CSPA Conduct Related Complaint Investigations in Q2 after Screening by the LECA

	Q2 2025	Q2 2024	2 YR AVG Q2	2024 Total
Performance of Duties	7	8	8	17
Performance of Duties – Driving Related	140	108	124	590
Compliance with Laws	0	1	1	2
Human Rights and Charter Rights	0	1	1	2
Interaction with Public	18	2	10	24
Integrity	1	0	1	0
TOTAL	166	120	145	635

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.

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 Q2 2025.

Service or Policy Complaints

There were no Service or Policy related Public complaint received under the PSA from the LECA in Q2 2025.

There were six Service related Public complaints received under the CSPA from the IoP in Q2 2025. These investigations are being conducted by the IOP and remain ongoing. The results of the IOP's findings will be provided in future reports, within the quarter their investigation are completed.

Table 7 (below) outlines the total number of Service and Policy complaints received in Q2 2025 as compared to Q2 2024, as well as the Q2 five-year average.

Table 7 - Policy and Service Complaints

	Q2 2025	Q2 2024	5 YR AVG Q2	2024 Total
Policy (LECA)	0	0	0	0
Service (LECA)	0	4	7	8
Service (IoP)	6	0	n/a	7
TOTAL	6	4	7	15

Table 8 (below) outlines Service or Policy complaints referred for investigation in Q2 2025 compared to Q2 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

	Q2 2025	Q2 2024	5 YR AVG Q2	2024 Total
Policy (LECA)	0	0	0	0
Service (LECA)	0	4	17	8
Service (IoP)	6	0	n/a	7
TOTAL	6	4	17	15

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 Q2 2025, six ERP files were received from the LECA. One file was concluded after a resolution was reached, one was withdrawn by the complainant, three did not proceed through ERP, as the criteria was not met and one remained outstanding at the end of Q2 2025.

Conduct Complaint Status

The following summarizes the status of the 238 conduct related Public and Internal complaints that were received or generated in Q2 2025.

- 187 cases completed
 - 11 resulted in Section 200 discipline – no hearing (all resulting from driving related complaints)
 - 4 withdrawn by the complainant
 - 1 resulted in informal resolution
 - 69 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.
 - 1 investigation was discontinued by the LECA after being referred for investigation.
 - 101 were unsubstantiated or resulted in no further action (all resulting from driving related complaints)
- 51 investigations are ongoing (this includes 28 driving related complaints)

Table 9 (below) illustrates the Q2 2025 complaint status for Conduct related Public and Internal complaints, including a comparison with Q2 2024 and the five-year average for the same quarter:

Table 9 - Complaint Status - Conduct Complaints

RESOLUTION	Q2 2025	Q2 2024	5 YR AVG Q2
No Further Action	101	127	57
Unsubstantiated	0	1	0
Vexatious/Frivolous/Bad Faith	11	3	8
Informal Resolution	1	0	0
Informal Resolution - Mediation	0	0	0
Withdrawn by Complainant	4	13	8
Withdrawn by Complainant through Mediation	0	0	2
Withdrawn Prior to Screening of Complaint	0	1	1
Terminated by the LECA after being referred for investigation	1	0	0
Over Six Months	2	0	1
Not in the Public Interest	52	33	45
Third Party - Not Directly Affected	1	0	1
Better Dealt with Under another Act or Law	0	1	1
No Jurisdiction – LECA	2	0	0
Conduct Does No Constitute Misconduct	1	0	0
Complaints Not Resulting in Discipline Total	176	179	124
Informal Discipline	0	17	6
Disciplinary Hearing (PSA)	0	0	0
Discipline (Section 200) – No Hearing (CSPA)	11	0	n/a
Demotion and Termination Hearing (CSPA)	0	0	n/a
Complaints Resulting in Discipline total	11	17	8

Complaints Outstanding total	51	39	55
TOTAL	238	235	187

Disciplinary Measures under the CSPA

In Q2 2025, disciplinary measures were imposed 33 times. These disciplinary measures can be broken down as follows:

1. Legislative authority for disciplinary measures:
 - Section 200 of the Act (without a hearing): 31 cases
 - Section 200 of the Act (with a hearing under section 201): 0 cases
 - Section 202 of the Act (following a hearing): 2 cases
2. Nature of Misconduct:
 - 27 cases involved performance of duties (all driving related)
 - 3 cases involved interactions with the public
 - 2 cases involved compliance with law
 - 1 case involved human rights
3. Types of Disciplinary Measures Imposed:
 - Counselling was imposed in 31 cases
 - A forfeiture and counselling was imposed in 7 cases
 - A demotion was imposed in 2 cases
4. Forfeiture of time:
 - The average time forfeited was 7 hours
 - The total time forfeited was 48 hours.

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 was one officer suspended without pay in Q2 2025, which is the same number of officers suspended in Q2 2024 and is below the five-year Q2 average of two. At the start

of Q2 2025, there were an additional four officers on suspension, which remained at four by the end of Q2 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 two times in Q2 2025. Both investigations remain ongoing.

Table 10 (below) provides a comparator of SIU investigations between Q2 2024 and Q2 2025, as well as the five-year average for the same quarter.

Table 10 - Special Investigations Unit Investigations

TYPES OF INVESTIGATIONS	Q2 2025	Q2 2024	5 YR AVG Q2
Death	0	0	0
Serious Injury	1	1	2
Sexual Assault	0	0	0
Discharge of Firearm at Person	1	0	0
TOTAL	2	1	2

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 Q2 2025, there were three request for reviews, an increase from two in Q2 2024.

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.