

**Report to:**

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

**26 January 2026**

**Submitted by:**

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

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**SUBJECT: ADMINISTRATION OF POLICY AND PROCEDURE COMPLAINTS**

**OBJET: ADMINISTRATION DES PLAINTES RELATIVES AUX POLITIQUES ET  
AUX PROCEDURES**

#### **REPORT RECOMMENDATIONS**

**That the Ottawa Police Service Board approve:**

- 1. The attached by-law regarding the Complaints Committee.**
- 2. The attached policy on Policy and Procedure Complaints.**
- 3. The attached updated Policy GA-4 on Board Committees.**

#### **RECOMMANDATIONS DU RAPPORT**

**Que la Commission de service de police d'Ottawa approuve:**

- 1. Le règlement ci-joint concernant le Comité des plaintes .**
- 2. La politique ci-jointe relative aux plaintes en matière de politiques et de procédures.**
- 3. La version mise à jour ci-jointe de la politique GA-4 sur les comités de la Commission.**

#### **BACKGROUND AND PURPOSE**

## Policy and Procedure Complaints under the CSPA

Section 107 of the *Community Safety and Policing Act, 2019* (CSPA) allows members of the public to submit complaints to the Inspector General of Policing regarding a range of matters collectively referred to as *policing complaints*. These include complaints relating to the adequacy and effectiveness of policing, as well as complaints concerning a failure by a police service board or police service to comply with the CSPA or its regulations, including systemic failures. Such complaints fall within the investigative mandate of the Inspector General.

Section 107 also provides for two additional categories of policing complaints: complaints relating to the policies, by-laws, rules, or procedures of a police service board, and complaints relating to the procedures established by a chief of police. When the Inspector General determines that such a complaint is appropriately addressed at the governance level, subsection 107(6) requires them to refer the complaint to the relevant police service board and to inform the complainant of that decision.

Pursuant to subsection 107(7), when a complaint is referred to a police service board, the Board is required to:

- review the complaint as it relates to Board policies and Chief's procedures; and
- report back to the Inspector General, within any timeline they may have specified, as well as to the Solicitor General, on any steps taken.

In practice, the Inspector General has generally specified a 90-day timeline for the completion of such reviews. These timelines require boards to have clear processes, and efficient decision-making mechanisms in place.

### The Board's Existing Complaints Committee

The Board currently has a Complaints Committee that was established under the former *Police Services Act*. Under that legislative framework, the Committee's role included reviewing certain service and policy complaints that had been investigated by the Ottawa Police Service at the request of a complainant.

With the coming into force of the CSPA, that complaints regime was repealed. The CSPA does not contemplate a role for police service boards in reviewing complaints investigated by police services at the request of complainants. As a result, the Complaints Committee was expected to be phased out and has been largely dormant since 2024.

However, the Inspector General's emerging practice of referring policy and procedure complaints directly to police service boards has created a new and distinct governance function for boards – one that is separate from the former complaints regime under the *Police Services Act, 1990*.

### Need for a Revised Governance Framework

The Board has recently received a number of Policy and Procedure Complaints referred by the Inspector General. These referrals have highlighted several challenges:

- the absence of a formalized process;
- uncertainty regarding roles and responsibilities between the Board and Service, particularly where Chief's procedures are engaged;
- the lack of delegated authority to enable timely decision-making within the Inspector General's prescribed timelines;
- issues around the application of transparency provisions contained in sections 43 and 44 of the CSPA, and the need to balance transparency with confidentiality and privacy, especially when complaint documents include personal information;
- the need for a procedurally sound mechanism for approving and communicating the Board's responses to such complaints.

In consultation with peer police service boards, the Inspectorate of Policing, and the Ottawa Police Service's Professional Standards Unit – which has been designated as the Board's Office point of contact regarding Policy and Procedure Complaints – it became clear that the Board's policies and committee structure were not adequate to support this new statutory function.

This purpose of this report is to recommend the adoption of a revised governance framework to enable the Board to respond effectively, consistently, and within prescribed timelines to Policy and Procedure Complaints referred by the Inspector General of Policing. This involves repurposing the Complaints Committee and establishing a clear, modern framework that reflects the Board's responsibilities under the CSPA.

### **Role of the Inspector General Following Board Review**

Guidance provided by the Inspectorate of Policing indicates that, while Policy and Procedure Complaints may be referred to police service boards for review, the Inspector General retains an oversight role in relation to those complaints. In particular, where the Inspector General is not satisfied with the steps taken by a board in response to a referred complaint, the Inspector General may determine that further action is warranted, including resuming consideration of the matter.

## **DISCUSSION**

### **Need for Formalization and Delegated Authority**

Experience to date has demonstrated that responding to Policy and Procedure Complaints referred by the Inspector General involves complex information flows, engagement with the Service on Chief's procedures, and the preparation of a formal Board response that must be approved within prescribed timelines. The absence of a formalized process and clear delegation of authority has created risks related to timeliness, role clarity, and procedural robustness.

The proposed by-law addresses these gaps by clearly establishing the mandate, authority, composition, and procedures of a re-purposed Complaints Committee. In particular, the by-law delegates the authority necessary for the Committee to complete the Board's review and approve responses within Inspector General timelines.

The proposed Policy on Policy and Procedure Complaints complements the by-law by establishing staff-level roles and responsibilities in supporting the Complaints Committee, and related information flows.

Importantly, the policy expressly limits the scope of reviews to policies and procedures, while allowing the Committee to consider the factual context of a complaint for that purpose. It also makes clear that the Committee does not investigate or make findings regarding the conduct of individual members of the Ottawa Police Service, thereby preventing mandate creep and ensuring alignment with the CSPA.

### **Timeliness, Transparency, and Accountability**

The proposed framework places a strong emphasis on timeliness, consistent with the expectations of the Inspector General. It establishes clear roles and timelines, provides for the ability to request extensions where warranted, and ensures that outcomes are communicated appropriately to the Inspector General, and to the Solicitor General.

The proposed framework also reflects guidance from the Inspectorate of Policing, which has indicated that, as a matter of good practice, police service boards should provide complainants with a copy of their response to the Inspector General. While the Act does not expressly require boards to do so, this practice promotes responsiveness, accountability, and public confidence in the complaints process. The proposed policy therefore provides for the communication of outcomes to complainants, subject to any limitations or conditions determined by the Complaints Committee and to applicable legal and confidentiality requirements.

In developing this framework, careful consideration was also given to the requirements of sections 43 and 44 of the CSPA, which govern public and closed meetings of police service boards and their committees. The proposed by-law expressly empowers the Complaints Committee to determine whether a matter should be considered in public or in camera, in accordance with the Act. At the same time, both the by-law and the supporting policy clarify that consideration of a complaint in camera does not preclude the communication of outcomes, where appropriate.

Finally, the introduction of an annual reporting requirement will allow the Board to monitor trends, identify recurring or systemic issues, and ensure that lessons learned from Policy and Procedure Complaints inform future governance, policy development, and oversight activities.

## **Complexity of Policy and Procedure Complaint Reviews and Committee Interactions**

The review of Policy and Procedure Complaints referred by the Inspector General is not a narrow or purely administrative exercise. Guidance provided by the Inspectorate of Policing has clarified that such reviews are expected to be action-oriented, with a focus on corrective measures and continuous improvement.

In practice, complaints referred to the Board often raise complex issues that require careful examination of governance frameworks, the interaction between Board policies and Chief's procedures, and the broader implications for policing services delivered to the community. These complaints frequently provide valuable insight into how policies and procedures operate in real-world contexts.

Policy and Procedure Complaints can surface policy gaps, ambiguities, or unintended consequences in areas that may not previously have been a focal point of the Board's proactive policy agenda. In this sense, complaints serve as a meaningful mechanism for identifying issues that manifestly matter to residents and that warrant governance-level attention.

Under the proposed framework, the Complaints Committee's role is to conduct an action-oriented review of complaints and to identify opportunities for corrective action or improvement. The Committee will do so while remaining firmly within its mandate and avoiding duplication of functions assigned to other Board committees. Where appropriate, the Complaints Committee may recommend follow-up actions or matters for consideration by the Board, including policy-related issues.

The Policy and Governance Committee plays a complementary role in this framework. Where a complaint review identifies the need for policy development or amendment, responsibility for overseeing that work appropriately rests with the Policy and Governance Committee, consistent with its mandate. In this way, complaint-driven insights are translated into structured policy work through established governance processes, rather than being addressed in an *ad hoc* manner.

At the same time, the action-oriented nature of complaint reviews introduces an inherently unpredictable source of policy priorities. Unlike the Board's planned and proactive policy development pipeline, Policy and Procedure Complaints are driven by external referrals and timelines established by the Inspector General. As a result, issues arising from complaints may compete with pre-planned policy initiatives for the attention of the Policy and Governance Committee and Board staff.

While this dynamic may disrupt established policy development timelines, it also represents a valuable opportunity to engage in policy-development that is demonstrably responsive to emerging concerns and community-identified needs.

## **CONSULTATION**

The proposed framework for the administration and review of Policy and Procedure Complaints was developed with significant input and feedback from the Ottawa Police Service, in particular the Professional Standards Unit. That input was instrumental in shaping a process that is workable in practice, supports timely information flows, and clearly delineates roles and responsibilities between the Board and the Service where Chief's procedures are engaged.

In addition, the Board Office consulted with peer police service boards, including members of the Big 12 group, to understand how other boards are responding to the emerging practice of Policy and Procedure Complaint referrals by the Inspector General. These discussions confirmed that boards across the province are actively exploring a range of governance models, informed by differences in local context, resourcing, and anticipated complaint volumes.

Approaches being considered by peer boards include, among others:

- committee-based models similar to the proposed Complaints Committee framework;
- delegation of authority to the Executive Director or equivalent staff role;
- less formal or ad hoc review processes; and
- full Board-level consideration of complaints in jurisdictions with limited volumes or different capacity profiles.

The proposed approach reflects the Board's assessment of its own governance structure, resourcing, and oversight responsibilities, and is intended to strike an appropriate balance between efficiency, procedural robustness, and accountability.

## **FINANCIAL IMPLICATIONS**

There are no immediate financial implications associated with the adoption of the proposed by-law and policies.

However, depending on the volume, complexity, and timing of Policy and Procedure Complaints referred to the Board by the Inspector General, the assessment and review of such complaints may place incremental demands on existing resources.

The Board has no control over the volume, timing, or flow of Policy and Procedure Complaints referred by the Inspector General. Where such complaints are referred, the Board is under a statutory obligation to review them and to report back within prescribed timelines. As a result, there is limited ability to mitigate the resource impact of these reviews, short of expediting them in a manner that could compromise their thoroughness, procedural soundness, or effectiveness, which would not be appropriate given the nature and importance of the issues raised.

The review of Policy and Procedure Complaints has already placed significant demands on the capacity of the Board Office, notwithstanding the recent expansion of the team. These demands arise from the complexity of the issues involved, the volume of information flows required, and the need for careful coordination with the Service. Especially when multiple complaints are received at the same time, these may compete with other priorities, including proactive policy development, strategic initiatives, and broader governance work. Similar capacity pressures may arise within the Ottawa Police Service, particularly within the Professional Standards Unit, depending on the scope and complexity of the complaints referred.

Capacity implications associated with the Board's statutory responsibilities in respect of Policy and Procedure Complaints are expected to be considered as part of the review of the Board's Staffing Strategy scheduled for 2026, including an assessment of whether existing resources remain adequate to support both complaint-related obligations and other core governance priorities, such as proactive policy development.

## **CONCLUSION**

Policy and Procedure Complaints referred by the Inspector General represent a significant development in the Board's governance environment under the CSPA. These referrals have a material impact on how the Board, its committees, Board staff, and the Service engage with issues of policy, procedure, and accountability.

The review of such complaints mobilizes Board members, Board Office staff, and Service resources, often within compressed timelines, and requires careful coordination, analysis, and judgment. In doing so, these complaints have the potential to shape the Board's

policy agenda and priorities, by drawing attention to issues that emerge directly from community concerns and lived experience, including areas that may not previously have been the focus of proactive policy development.

In this respect, Policy and Procedure Complaints introduce an action-oriented and corrective dimension to the Board's work, one that complements, but can also disrupt, planned policy initiatives and oversight activities.

The proposed by-law and supporting policies provide the Board with a structured, transparent, and procedurally sound framework for administering these reviews. They clarify roles and responsibilities, enable timely and defensible decision-making, support appropriate engagement with the Service, and ensure accountability to the Inspector General, the Minister, and the public.

### **SUPPORTING DOCUMENTATION**

Document 1 – Draft By-law No. XX-2026

Document 2 – Draft updated Policy GA-4 *Board Committees – with tracking*

Document 3 – Draft updated Policy GA-4 *Board Committees – without tracking*

Document 4 – Draft new Policy CR-X Policy and Procedure Complaints