

Review of Police Training, Opportunities for Improvement – Toronto Police Service

Date:	February 27, 2007
To:	Audit Committee, City of Toronto
From:	Alok Mukherjee, Chair, Toronto Police Services Board

SUMMARY

The purpose of this report is to provide the Audit Committee with a copy of the Review of Police Training, Opportunities for Improvement – Toronto Police Service, prepared by the Auditor General and a copy of the Toronto Police Service’s response to the Auditor General’s report.

Financial Impact

There are no financial implications with regard to the receipt of this report.

ISSUE BACKGROUND

At its meeting held on January 25, 2007, the Toronto Police Services Board was in receipt of the following two reports:

- Review of Police Training, Opportunities for Improvement – Toronto Police Service dated October 26, 2006, from Jeffrey Griffiths, Auditor General, City of Toronto
- Management’s Response to Training Audit dated January 8, 2007, from William Blair, Chief of Police

COMMENTS

Mr. Jeff Griffiths, Auditor General, was in attendance and delivered a presentation to the Board on his report entitled *Review of Police Training, Opportunities for Improvement – Toronto Police Service*.

Supt. Darren Smith, Community Mobilization, was in attendance and delivered a presentation to the Board on the Service’s response to the Auditor General’s report.

Printed copies of Mr. Griffith's and Supt. Smith's slide presentations are on file in the Board office.

Mr. Dave Wilson, President, Toronto Police Association, was in attendance and delivered a deputation to the Board with regard to the Auditor General's report.

Ms. Jane Doe and Ms. Beverly Bain were in attendance and delivered a presentation to the Board with regard to the Auditor General's report. Prior to Ms. Doe's presentation, I directed that Ms. Doe not be filmed, taped, photographed or identified by name pursuant to court order.

The Board approved the following Motions:

1. THAT the Board receive the foregoing reports from the Auditor General and the Chief of Police and receive the presentations and the deputation;
2. THAT the Board endorse the recommendations of the Auditor General;
3. THAT the use of force training be brought into compliance with the provincial legislation immediately and that the Chief of Police provide a report to the Board for its April 26, 2007 meeting identifying how the compliance will be ensured;
4. THAT, with respect to the issue of compliance with legislation, Service procedures and Board policies, the Chief of Police report to the Board for its April 26, 2007 meeting on what processes are in place to assess and ensure compliance as well as deal with non-compliance and how those processes can be strengthened;
5. THAT only qualified coach officers be permitted and that performance evaluations be reviewed immediately to ensure compliance with Board policy and Service procedures;
6. THAT, on a "go forward" basis:
 - (a) the Chief of Police provide the Board with a report for its April 26, 2007 meeting containing a list of the conferences and/or seminars which the Toronto Police Service has committed to host, sponsor or organize in 2007 and beyond, and that the report include the rationale for each of the events, estimated cost of staff and resource involvement, and expected benefits to the Service;
 - (b) with the exception of the conferences and/or seminars that may be noted as a result of Motion 6(a), the Toronto Police Service not commit to hosting, sponsoring or organizing any other conferences and/or seminars until the Board establishes, in consultation with the Chief of Police, a policy governing conferences and/or seminars;
 - (c) the Chair bring forward a policy to the June 14, 2007 meeting of the Board for approval; and

- (d) following the approval of a policy, the Chief of Police provide to the Board for information, the Service Procedure that will implement the policy.
7. THAT the Chief of Police provide a report to the Board for its April 26, 2007 meeting on a new staffing model that addresses the recommendation of the Auditor General on coordinating training;
 8. THAT with respect to the issues raised in the Auditor General's report about the contents of reports to the Police Services Board, this matter be referred to the Chair for discussion with the Chief of Police and that the Chair report to the Board with respect to the outcome of the discussions with the Chief of Police;
 9. THAT the Chief of Police report to the Board on the information technology issues raised by the Auditor General, including the feasibility of HRMS housing the data and performing the functions identified by the Auditor General;
 10. THAT the Chief of Police report to the Board on the financial controls that the Service has established to ensure the efficient and accountable management of training and conference expenditures;
 11. THAT, with respect to the policy on donations, the Chair be directed to review the Board's policy in this area and that, in the interim, the Board confirm that the Board's Donations Policy which is reflected in Service Procedure 18-08 applies to all donations sought by members of the Toronto Police Service, monetary and non-monetary, for any purpose, including donations that may be solicited as a result of conferences or seminars that the Service is hosting on behalf of external organizations;
 12. THAT the Chief of Police provide the Board with a comprehensive financial report on the extent and nature of the Service's involvement in the FBI National Conference hosted by the Service and that this report detail all donations received; and
 13. THAT the Board request the Auditor General to conduct a review of the implementation of the recommendations in 18 months and that he provide a follow-up report to the Board on the results of the review.

A copy of Board Minute No. P53/07, in the form attached as Appendix "A", regarding this matter is provided for information.

CONTACT

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SIGNATURE

Alok Mukherjee
Chair, Toronto Police Services Board

ATTACHMENTS

Appendix A – Board Minute No. P53/07

A: city report trg ops.doc

Appendix A

THIS IS AN EXTRACT FROM THE MINUTES OF THE PUBLIC MEETING OF THE TORONTO POLICE SERVICES BOARD HELD ON JANUARY 25, 2007

#P53. REVIEW OF POLICE TRAINING, OPPORTUNITIES FOR IMPROVEMENT – TORONTO POLICE SERVICE

The Board was in receipt of the following report October 26, 2006 from Jeffrey Griffiths, Auditor General, City of Toronto:

Subject: Review of Police Training, Opportunities for Improvement –
Toronto Police Service

Purpose:

Attached is the Auditor General's report entitled "Review of Police Training, Opportunities for Improvement - Toronto Police Service" dated October 26, 2006. This review was conducted as part of the Auditor General's 2006 Annual Work Plan.

Financial Implications and Impact Statement:

The implementation of certain recommendations contained in this report will require additional ongoing resources. Some of these additional costs may be accommodated through the re-allocation of existing resources. It is also possible that the implementation of other recommendations may result in cost savings. Future costs and potential cost savings are not determinable at this time.

Recommendations

It is recommended that:

- (1) the recommendations in the attached Auditor General's report entitled "Review of Police Training, Opportunities for Improvement – Toronto Police Service" be adopted; and
- (2) the report be forwarded to the City's Audit Committee for information.

Background:

During the Auditor General's Review of the Investigation of Sexual Assaults – Toronto Police Service in late 1999, a recurring theme throughout the audit was the issue of police training. The 1999 review made 18 recommendations in relation to training. In a follow-up report dated October 2004 entitled "The Auditor General's Follow-up Review on the October 1999 Report Entitled: Review of the Investigation of Sexual Assaults, Toronto Police Service", a number of

the recommendations relating to training had not been implemented or were only partially implemented. In this context and in view of the significant funds expended on training, it was determined that a review of training at the Toronto Police Service should be included in the Auditor General's 2006 Work Plan.

The Terms of Reference for this particular review was submitted to the Toronto Police Services Board in early 2006.

Comments:

The attached report contains 39 recommendations. The Chief of Police, in a separate report, has prepared a detailed response to each of the recommendations.

Conclusions:

This review of police training is intended to bring a fresh independent perspective on the current training activities in place at the Toronto Police Service and to make practical, constructive and cost-effective recommendations. In conducting this review, significant research has been conducted on a wide range of publications and information relating to police training. While this research has provided us with significant background information, this review is not a comprehensive analysis of all facets of police training at the Toronto Police Service. This review is limited to the scope outlined in the section of the report entitled "Audit Objectives, Scope and Methodology". We have not, for instance, reviewed the content of various training courses taught at either C. O. Bick College or by the specialized Units, nor have we reviewed in detail the functionality of the management information system supporting the training program.

We have attempted to develop recommendations which are practical and can be implemented with minimal or no cost. Where there may be additional costs in certain areas, such as the need to comply with training relating to the use of force legislation, we are of the view that there may be cost savings elsewhere which compensate for this.

The recommendations contained in this report are a first step towards improving the training process at the Police. The next step, as indicated in many of our recommendations, is for the Chief of Police to evaluate the relevance and appropriateness of each one of the recommendations. Further, it is important that the implementation of the recommendations is given an appropriate level of attention, a process which has not always been the case with previous audit recommendations. We are of the view that the implementation of the recommendations will further improve the training process at the Toronto Police Service.

AUDIT REPORT IN BRIEF

INTRODUCTION

The training of police officers in the Toronto Police Service must meet standards to ensure that training is relevant, effective, current and properly delivered in a consistent and cost-effective manner. For the needs of the Police Service and the public of the City of Toronto to be met, it is essential that police officers are appropriately, effectively and efficiently trained. In today's society, more than ever before, police officers require a wide range of skills. All police officers require training to develop the skills, knowledge, attitudes, creativity and understanding to deliver a quality and effective service to members of the public. Police officers need to acquire and develop a wide range of skills in such diverse areas as the law, self defence, information technology and first aid; they require the ability to effectively deal with members of the public sometimes in difficult, violent and stressful circumstances, while acting with integrity, impartiality, compassion and sensitivity; they need to be thorough and innovative in the way they conduct investigations and, at the same time, document their actions throughout the investigations in a clear, accurate and concise manner so that, if required, it can be presented as evidence in a court of law. In addition, all of these skills are required in a dynamic environment where there are ongoing advancements in technology and an increasing number of new case law decisions, as well as judicial reviews and inquiries. In order to be effective in each one of these skills, the training of police officers is of paramount importance.

Training is the heart of effective and responsive policing and is fundamental to the running of any organization and the development of its staff, but the time spent on training must be balanced against the financial and opportunity costs. The opportunity costs for any police service is the impact of police training on the availability of police officers for day-to-day policing duties.

This review of police training, to the best of our knowledge, is the first such review of the training program of a major Canadian police service. The Auditor General of Canada has reviewed certain aspects of the operations of the Royal Canadian Mounted Police and the Auditor General of Ontario has conducted similar work on the Ontario Provincial Police. None of this work has been focused exclusively on the training of police officers.

A number of major studies on police training programs have been conducted in the US over the past number of years. These studies generally have been conducted in response to significant events such as the Rodney King affair in Los Angeles in the early 1990s, resulting in the Christopher Commission Report as well as the Report of the Rampart Independent Review Panel commissioned in 2000 in the wake of the Rampart scandal again in the Los Angeles Police Department. These studies contain a significant number of recommendations relating to training.

In the UK, a structured "best value review" on police services' operations is conducted by Her Majesty's Inspectorate of Constabulary under the Local Government Act of 1999. Each police service in the UK is required to undergo ongoing best value reviews. In conducting best value reviews relating to police training, the major focus has centred on ensuring that value for money is being attained by each police service. In order to evaluate the effectiveness and efficiency of

various training programs, certain best value reviews in the UK have placed emphasis on ensuring that:

“The right person is learning the right content, to the right standard, at the right time, in the right way, in the right place, at the right cost.”

During this review, we have been mindful of the approach taken during best value reviews of police training in the UK.

Our audit included a review of various reports on police training including the Christopher and Rampart Reports, as well as certain of the best value reviews conducted in the UK. Publications reviewed during the preparation of this report are included in Appendix 1 attached to this report.

We appreciate that resources are limited at the Toronto Police Service and in this report we have attempted to avoid recommendations that require significant additional funding. To provide the Toronto Police Service with a series of recommendations that require increased funding would do little other than serve as a basis for frustration. However, in our view, there are areas of non-negotiation in terms of increasing or reallocating training resources, especially in one area where the Service is not in compliance with provincial legislation. While there may be situations where increased resources need to be directed to certain training, it is likely that this can be done by reducing or eliminating certain non-mandatory lower priority training. This, of course, is an area which requires further review and evaluation by the Chief of Police.

In our view, the implementation of the recommendations contained in this report will further improve the training process at the Toronto Police Service. The Chief of Police is ultimately accountable for the training of his officers, as well as the safety of all officers in the Toronto Police Service. Consequently, the implementation of the recommendations is at the discretion of the Chief of Police.

IN SUMMARY – WHAT DID WE FIND?

The Toronto Police Service commits considerable effort and resources into the design and delivery of training. The Police Service must now make similar effort into improving the way it manages its training of police officers at the Training and Education Unit, as well as at the divisional level and in the specialized units.

The following is a summary of the key issues identified during the course of our review. Additional information in relation to each one of the following issues is contained in more detail in the balance of the report.

The Organizational Structure of the Training Program at the Toronto Police Service

While the Chief of Police is accountable for the training of all police officers in the Toronto Police Service, he has delegated the responsibility of different components of the training program to specific organizational units. The delegation of responsibilities to the Training and

Education Unit, the specialised units within the Service as well as the various divisional units has resulted in a situation where no one has overall responsibility for all police officer training at the Service.

Many of the issues identified throughout this review are directly attributable to the fact that no one person is familiar with, has responsibility for and has the authority to make decisions for all training throughout the Service.

Building Relationships – Changing With the Times

The Training and Education Unit operates within an environment which does not appear to encourage innovation and creativity in the areas of identifying better practices, not just on a national basis but also on an international basis. While we appreciate that budgetary restraints are a concern in the identification and development of better practices, the long-term benefits of being proactive in this area likely far outweigh the short-term costs, particularly in an area as important as training. In our view, management responsible for training at the Toronto Police Service should be encouraged to review police training practices throughout the world, build relationships with international training organizations and police services, identify and implement better practices, not “reinvent the wheel” and, where appropriate, take advantage of training resources available elsewhere. The Training and Education Unit should be further encouraged to facilitate the coordinated exchange of ideas, technology, procedures and specific training information.

While there is much to be learned from international police services, relationships with police training organizations closer to home, such as the Canadian Police Knowledge Network, also need to be further encouraged and developed.

Finally, there is also a need to develop and expand relationships with the academic community, as well as private sector training organizations, particularly in relation to the development and implementation of an effective training evaluation process.

The Cost of Training

Good decisions require good information. The cost of training at the Toronto Police Service is significant but has never been fully determined. Consequently, it is not possible to assess whether the Police Service is receiving value for money for its investment in training, nor is it possible to benchmark training costs against other police services.

Non-compliance With the Police Services Act

Our review identified instances where the Toronto Police Service is not in compliance with the Police Services Act in relation to use of force training. Officers, contrary to this legislation, are not receiving use of force training every 12 months. We identified instances where a number of police officers had not been trained anywhere from three to fourteen months beyond the time period required by legislation.

In the Police Service's Annual Report on the 2005 Training Programs dated May 23, 2006, it was reported to the Toronto Police Services Board that "the Toronto Police Service training is fully compliant with all government regulations." This is not the case.

Non-compliance With Internal Procedures

We have identified a number of areas where the Toronto Police Service is not in compliance with its own internal procedures in relation to training. While the focus of our review has centred on police officer training, we have also identified a number of cases where the Police Service is not in compliance with procedures which are not directly training related. Further, where procedures are no longer appropriate or out of date they should be revised.

The Training of New Police Officers

The future of the Toronto Police Service, to a great extent, depends on the effectiveness of its training of new officers. The training of new police officers is critical in shaping the future of the Police Service as well as the officer. Assigning coaches or mentors to assist in the training of new officers requires that coach officers be the "best and the brightest". Coach officers should also be appropriately trained to fulfil such an important role. The Police Service has developed comprehensive procedures to ensure that appropriate, experienced and trained officers are appointed as coach officers.

During the course of our review, we noted that certain procedures in connection with the training and appointment of coach officers are not being followed. Specifically, officers who are not qualified, both in terms of rank and required training, are being inappropriately assigned as coach officers. We have been advised that this situation occurs generally due to an absence of qualified coach officers even though the ongoing and future demand for coach officers is readily determinable.

Further, in a number of instances new police officers are not being evaluated in accordance with Toronto Police Service procedures and, as such, it is not possible to determine if these officers have gained the appropriate level of experience prior to carrying out their duties independently.

Finally, our review identified that the mix of classroom and field training of new officers at the Toronto Police Service is somewhat at odds with most other Police Services within Ontario. Generally, classroom training at the Toronto Police Service is higher than other police services while field training is somewhat lower. This area requires review, particularly as there are effective alternatives available to supplement classroom training.

The Management of the Training Program at C. O. Bick College

Our review identified the following issues in relation to the management of the police training program. Additional information on each one of these issues is included in the body of this report.

- The demand for training courses is identified annually based on information provided by unit commanders. However, there are no longer-term projections for training requirements of the Service. For example, there is no information available to determine how many officers require training for any of the specialized positions within the Police Service. Consequently, it is not possible to determine if too few or too many officers have been trained for certain responsibilities.
- The frequency and availability of a number of training courses are not meeting the demands of unit commanders. In certain cases, the number of high demand courses held throughout the year is inadequate to meet the needs of unit commanders. Further, a number of low demand courses are being held at the expense of meeting higher demand requirements.
- Police officer attendance at certain training courses is regularly less than capacity even though legislative training requirements are not being met.
- Police officers are being allowed to attend certain training courses when they do not have the pre-requisite qualifications.

The Evaluation of the Effectiveness of Training

Substantial amounts of money, resources and time are dedicated to training police officers each year. Such significant effort is only worthwhile if training can be shown to have a positive effect on individual workplace performance and on the delivery of police services to the public. In view of the substantial resources devoted to police training, the Service should not restrict itself to evaluating training at the most basic level.

The current evaluation of the effectiveness of police training by the Toronto Police Service generally centers on obtaining immediate feedback from students on each training course (known as a reactive evaluation) and also an assessment as to whether there is an increase in the student's knowledge and skills at the end of the course or at the end of each training component (known as a learning evaluation).

While both of these evaluation methods are effective in terms of their objectives, little evaluation work is being conducted to determine whether or not training has had an impact on how each officer conducts himself in the "real world" nor has any evaluation been conducted to measure the impact of training on the Police Service as a whole. The overall value of the training program at the Police Service can not be measured unless there is an effective and complete evaluation process in place.

Annual International Conferences and Seminars

The Toronto Police Service organizes a number of annual international conferences. While a significant amount of staff time is devoted to the organization of these conferences, the extent of this time has not been determined. Even though it has been reported that the majority of these conferences operate in a surplus position, this is not the case if organizational costs are included in the operating results of each conference. In order to determine the actual costs incurred of organizing these conferences, all costs should be appropriately accounted for.

Further, each of these international conferences attracts attendees external to the Toronto Police Service. The total attendees at these conferences in 2005 were in the range of 1,300, of whom over 70 per cent were non Toronto Police Service staff. While we appreciate the networking benefits of such events, the Toronto Police Service has no mandate to train officers from outside Toronto. The networking benefits of hosting these conferences should be weighed against the actual costs of training a relatively small number of Toronto police officers.

Alternate Ways of Delivering Training

The potential exists to provide effective training outside the classroom or at least blend classroom training with alternate forms of learning. One of the training challenges facing the Toronto Police Service relates to providing an adequate level of training to police officers while at the same time ensuring that day-to-day front-line officer duties are not compromised. Alternate ways of delivering training, such as e-learning or distance learning, have the potential to reduce classroom time for certain types of training and, at the same time, provide an effective training alternative. There are also opportunities to “blend” classroom and e-learning training. While the concept of e-learning and distance learning are avenues being pursued by the Training and Education Unit, their introduction to ongoing training programs at the Police Service has been limited. An evolution in police training towards greater use of alternative learning methods and technology based training solutions must be accompanied by clear policies on support mechanisms, monitoring of achievement and “on and off duty” requirements.

Simulation or immersive training is an area requiring further evaluation by the Toronto Police Service. One of the benefits of simulation or immersive training is to bring police training to life and provide officers with experiences within real life settings that are readily transferable to the day-to-day world of live policing. Current simulation training in the Toronto Police Service involves largely role playing with minimal use of new technology. Simulation training in the UK, for example, is much further advanced than Toronto and as such requires further review.

Instructors at the Police College

Certain police officers providing training at the C. O. Bick College have not attended various “train the trainer” courses. Attendance at these courses would likely improve their effectiveness as trainers. In addition, the delivery of certain non police related training courses by police officers should be evaluated to determine if they could be more effectively delivered by civilians.

The rotation of teaching staff at the C. O. Bick College should be considered. A number of police officers currently assigned to C. O. Bick College have been in their positions for a significant period of time. Rotating the best police officers from day-to-day operational duties

through to training instructor's positions brings fresh perspectives into the classroom and ensures that officers with relatively recent operational experience are teaching at the College. The utilization of officers with fairly recent field experience also has the potential to increase the credibility of the training process with participants

Other Issues Identified During the Review – Some Training Related, Others Not

During the course of our review, we identified a number of further issues which we have reported separately. Certain of these pertain directly to training while others are only tangentially related to the training of police officers. Some of the issues we have identified such as non-compliance with both Police Service procedures and Police Services Board policy are important and need to be addressed immediately. Other issues, while less important require attention over the longer period.

Conclusion

Even though this review is, in our view, comprehensive, it has not been possible to address all components of the training program at the Police Service. For example, we have not reviewed the content of individual training courses. Further, even though we have conducted a certain level of benchmarking with other police services, this exercise has been limited in its scope only because of the general absence of detailed benchmarking material and information. In particular, the benchmarking of training costs with other police services has been difficult due to the fact that it is not possible to determine how training costs at other police services have been accounted for. Even in the UK where independent best value reviews on police training have been conducted for a number of years, the consistency in regards to the accounting for training costs has been problematic.

The recommendations contained in this report are a first step towards improving the training process at the Police. The next step, as indicated in many of our recommendations, is for the Chief of Police to evaluate the relevance and appropriateness of each one of the recommendations. A genuine commitment from senior staff will be required to evaluate and address the implementation of the recommendations. It is important that the implementation of the recommendations be given an appropriate level of attention. This, in certain circumstances, has not been the case with previous audit recommendations.

The Auditor General's Office has initiated a comprehensive follow-up process of all audit recommendations at the City. This follow-up process has been designed to ascertain the status of the implementation of audit recommendations and is being extended to the City's Agencies, Boards and Commissions, including the Toronto Police Service. Over the next 12 to 18 months, the Auditor General's office will review the status of the implementation of all recommendations contained in this report, as well as other audits conducted at the Toronto Police Service, and will report the status to the Toronto Police Services Board.

Finally, the objectives in any audit process are to identify areas for improvement. In many cases, an audit process does not specifically address or comment on areas of excellence. The training process at the Toronto Police Service has areas where it excels, particularly in terms of the high

level of satisfaction of its students with many of the training courses provided. It now needs to better manage the training process to ensure that the Police Service is receiving maximum value for every dollar invested in training. The implementation of the recommendations contained in this report will assist the Toronto Police Service in achieving this objective.

**Review of Training, Opportunities for Improvement –
Toronto Police Service
October 26, 2006**

Recommendations

1. The Chief of Police review the management structure of the training program at the Police Service in order to ensure that accountability and responsibility for the training program throughout the Police Service are clearly defined and, if considered appropriate, assigned to one individual. This individual should be at the appropriate command level, be capable of providing leadership to ensure and enforce appropriate management, compliance, integration of information technology support, and financial controls in all areas of the training program.
2. The Chief of Police assess the Toronto Police Service's relationships with police training organizations both within and outside Canada. The Training and Education Unit be directed to investigate best practices in all areas of police training including e-learning and simulation training and develop working relationships with other major international police service training organizations. Such a relationship to concentrate on the exchange of training practices, information and training technology. Further, the Chief of Police evaluate the costs and benefits of joining the Canadian Police Knowledge Network (CPKN). The Training and Education Unit be required to report to the Chief of Police on a regular basis with details of the relationships formed along with information collected on best practices.
3. The Chief of Police ensure that the total costs of all training are summarized, accounted and budgeted for and disclosed separately. The training costs should include all training provided by the Toronto Police Service including training provided by the specialized units, training provided by divisional training sergeants, and costs relating to the organization of various conferences and seminars. Such training costs should be benchmarked against other major police services within Canada, the US and the UK.
4. The Chief of Police ensure that the Toronto Police Service is in compliance with the Equipment and Use of Force Regulation of the Police Services Act. The training program at the Training and Education Unit be amended to accommodate legislative requirements.
5. The Chief of Police direct all members of the Toronto Police Service that they are required to comply with all policies and procedures issued by the Chief, as well as directives approved and issued by the Toronto Police Services Board.
6. The Chief of Police consider the implementation of an internal control process where compliance with legislation, as well as compliance within policies and procedures, is

verified on a sample basis by the Internal Quality Assurance Group. Such a sample be determined on a priority/risk basis. Instances of non-compliance be reported to the Chief of Police and dealt with through the disciplinary process.

7. The Chief of Police direct all Unit Commanders that under no circumstances should there be any contravention of the Policy (Policy 14-03) relating to coach officers. Only first class constables who are qualified and trained pursuant to Policy 14-03 should be assigned as coach officers.
8. The Chief of Police direct the Training and Education Unit to set up an internal control management information process to ensure that only qualified officers attend the coach officers course. Non-qualified officers not be permitted to attend the coaching course.
9. The Chief of Police determine, on an ongoing basis, the projected longer term requirements for trained police coach officers. The analysis takes into account those police officers who have received coach officer training but who are no longer eligible to perform coaching responsibilities. The Training and Education Unit be required to amend the number of training courses provided for coach officers in order to meet projected demands.
10. The Chief of Police review the length of the coaching time provided by coach officers to probationary police officers in order to ensure that it is at an appropriate level. Further, the amount of classroom time provided to probationary police officers be reviewed with a view to substituting classroom learning with alternate training methods such as e-learning.
11. The Chief of Police ensure that field training activity evaluation reports for probationary officers are completed by all coach officers on a timely basis, reviewed, and authorized by appropriate supervisory staff. For those probationary officers who have not been exposed to the operational or administrative activities required in the field training report, unit commanders be required to adjust coaching periods to ensure that all appropriate training is completed. Probationary officer training should continue until all such operational or administrative activities contained in the field training activity report are completed.
12. The Chief of Police review the current procedure concerning the appointment of coach officers to specifically address circumstances where such officers are the subject of a substantiated public complaint. The procedure should also address the steps to be taken when existing coach officers are the subject of a public complaint.
13. The Chief of Police be required to develop a long term strategic training plan to address the number of police officers required to be trained for various specialized units within the Toronto Police Service.
14. The Chief of Police evaluate the Human Resource Information System in order to ensure that the capabilities of the system are being used appropriately and to their full potential.

Once determined, such information be communicated to all appropriate staff and, in addition, training specific to the reporting capabilities of the system be provided to all appropriate staff.

15. The Chief of Police ensure that training is being provided for all high priority courses. Lower priority courses not be provided when there are shortfalls in meeting demands for high priority courses.
16. The Chief of Police ensure that, wherever possible, Toronto police officer attendance at each Advanced Patrol Training Course is maximized taking into account operational requirements.
17. The Chief of Police review the content of the Advanced Patrol Training Course in order to ensure that the training provided is relevant and required on an annual basis. For non-mandatory training, consideration be given to providing such training either through an e-learning facility or by training sergeants at the divisions.
18. The Chief of Police ensure that Toronto police officers be permitted to attend training courses only if the required prerequisite qualifications have been met. Prerequisite qualifications include attendance at a prior course or a requirement that officers be at a certain rank within the Toronto Police Service. The Training and Education Unit be assigned responsibility to ensure that this takes place.
19. The Chief of Police direct that attendance by Toronto police officers for specific training be verified based on a predetermined approved demand. Toronto Police officers not be provided training in areas which are not relevant to their current and short-term future responsibilities. Criteria be established to determine the most appropriate time period for required training prior to an officer assuming the relevant responsibilities.
20. The Chief of Police evaluate all training courses at the Toronto Police Service, including those courses delivered by the specialized units in order to ensure that the length and content of all such courses is appropriate. In particular, the Chief of Police review the scenes of crime officer training to determine the need and the value of the extensive field training provided by the Toronto Police Service.
21. The Chief of Police review the training evaluation process to ensure that evaluations submitted by course participants are appropriately summarized and analyzed for management analysis and review. All summaries be reviewed by the Manager of the Training and Education Unit to ensure that all suggestions for change or amendment to course content are considered and where appropriate incorporated into future training courses.
22. The Chief of Police review the evaluation process relating to the effectiveness of training particularly in regards to the impact of training for on-the-job performance as well as its

impact on the Toronto Police Service as a whole. Consultation be initiated with the Ontario Police College, major international police services and private sector training organizations in order to ensure that the Toronto Police Service can take advantage of the evaluation methodology being developed and used elsewhere.

23. The Chief of Police ensure that all costs incurred in organizing annual international conferences are accurately and properly accounted for. Such costs to include all Toronto police officers salaries and any other administrative costs. The results of this analysis determine the viability of continuing to host international conferences. In any event, conference registration fees be determined after taking into account all organizational costs. Further, the Chief of Police review the procedure in connection with the carry forward of individual conference surpluses to future years.
24. The Chief of Police review the benefits of the Toronto Police Service organizing nual international conferences for the benefits of a majority of participants who are external to the Toronto Police Service. Such an evaluation be documented and take into account the costs and the relative merits of training both internal and external participants. Further, the Chief of Police give consideration to determining whether or not it is the role of the Toronto Police Service to organize international conferences on an annual basis, particularly when the Toronto Police Service procedure states that “units may from time to time find it necessary to host or plan Toronto Police Service authorized seminars.”
25. The Chief of Police ensure that evaluations are completed for all future annual conferences and seminars organized by the Toronto Police Service. Evaluations be independently collated and summarized by the Training and Education Unit and results communicated to conference and seminar organizers. Such evaluations be one of the determinants for continuing future conferences and seminars.
26. The Chief of Police direct that those Toronto police officers responsible for organizing conferences and seminars be required to comply with all Toronto Police Service policies and procedures including those relating to the procurement of conference related goods and services.
27. The Chief of Police give consideration to the coordination and consolidation of all conference related budgets. Attendance at conferences be approved subject to the attendance meeting the overall priorities of the Toronto Police Service.
28. The Chief of Police direct that the procedure in connection with the reporting requirements for Toronto police officers, in connection with conference, seminar or course attendance, be complied with.
29. The Chief of Police assess the training programs delivered by the Training and Education Unit to determine whether or not there are alternative and more cost effective methods of delivery. All new training requirements be evaluated in regard to the most appropriate method of delivery. In addition, the concept of e-learning should be further developed particularly for “refresher” training. Procedures be developed in regards to the evaluation

of e-learning opportunities, as well as the scheduling of such training. In addition, the increased use of simulation training should also be reviewed and special consideration be given to an evaluation of the simulation training technology currently in use in the UK and elsewhere.

30. The Chief of Police ensure that Toronto police officers who have been assigned instructional responsibilities have attended the required “train the trainer” courses or their equivalent.
31. The Chief of Police review all non police related training courses to determine if their delivery could be conducted more effectively by civilian instructors.
32. The Chief of Police consider restricting the length of time Toronto Police Officers are assigned as training instructors to the Training and Education Unit at the C. O. Bick College. Police instructors from the C. O. Bick College be reassigned to police divisions.
33. The Chief of Police ensure that the Toronto Police Service is in compliance with its Use of Force and Equipment Service Firearms Procedure which requires that when a police officer is absent from duty for an extended leave of absence (over 20 working days) or a serious illness or injury, the firearm along with the related equipment shall be retrieved under the direction of the Unit Commander and delivered to the Armament Office for safekeeping.
34. The Chief of Police ensure that the procedure requiring an annual inspection of firing ranges is complied with.
35. The Chief of Police direct that any sponsorships or donations received for conferences or for any other specific purpose are properly approved, in accordance with Policy 18-08, by the Unit Commander or by the Toronto Police Services Board as required. The Chief of Police further ensure that all other provisions of the Policy are complied with.
36. The Chief of Police ensure that, in accordance with policy, a central registry of all donations is maintained by the Chief’s Executive Office and details of all donations received or declined is reported to the Toronto Police Services Board semi-annually. Unit Commanders of all Divisions be advised of this requirement and a protocol be set up for the regular reporting of all such information to the Executive Office.
37. The Chief of Police ensure that performance standards are developed for all training activities throughout the Toronto Police Service. Such standards to apply to the Training and Education Unit, other training conducted by specialty units and training conducted at the divisional level.
38. The Chief of Police review the policy relating to the reimbursement of tuition fees for Toronto police officers attending university or college courses and direct that any reimbursement of tuition fees to Toronto police officers be restricted to those university or college courses directly related to the policing responsibilities of the officer.

39. The Chief of Police review the level of tuition fees charged to police officers from other police services or from other organizations attending courses organized by the Toronto Police Service with a view to charging amounts which are more in line with actual training costs. In addition, any tuition fees waived for police officers attending from other police services or organizations be appropriately authorized in writing.

The Board was also in receipt of the following report January 08, 2007 from William Blair, Chief of Police:

Subject: MANAGEMENT'S RESPONSE TO TRAINING AUDIT

Recommendation:

It is recommended that the Board receive the following report.

Financial Implications:

There are no financial implications resulting from the reception of this report. However, several of the responses relating to the recommendations contained within this report will have an associated cost, if these are adopted.

Background / Purpose:

The Police Services Act (PSA), Section 31(1), for the Province of Ontario stipulates that every municipality shall provide adequate and effective police services. The PSA specifies that in providing adequate and effective police services, a municipality shall provide the necessary infrastructure and administration for such services. Part of the police infrastructure includes and effective training program that ensures police officers can adequately perform required duties.

The risks associated with inadequate training are compromised public and officer safety, which may result in litigation. Additionally, escalating costs present a financial risk, when training is not economically planned and provided. Consequently, the City of Toronto Auditor General's 2005 Work Plan included a review of the Training Program of the Toronto Police Service.

The Auditor General commenced his review of the Training Program in 2006. This review resulted in a final report to be presented to the Board on January 25, 2007. Thirty-nine recommendations are contained within the report. As part of the audit process, the Auditor General requested that the Toronto Police Service respond to each of these recommendations.

The preliminary responses to each of the Auditor General's recommendations are appended to this report.

Deputy Chief Keith Forde, Human Resources Command, will be in attendance to answer any questions that the Board may have regarding this report.

Mr. Jeff Griffiths, Auditor General, was in attendance and delivered a presentation to the Board on his report entitled *Review of Police Training, Opportunities for Improvement – Toronto Police Service*. Copies of the Executive Summary to the report and a list of the 39 recommendations are appended to this Minute for information. A copy of the complete report is on file in the Board office.

Supt. Darren Smith, Community Mobilization, was in attendance and delivered a presentation to the Board on the Service's response to the Auditor General's report.

Printed copies of Mr. Griffith's and Supt. Smith's slide presentations are on file in the Board office.

Mr. Dave Wilson, President, Toronto Police Association, was in attendance and delivered a deputation to the Board with regard to the Auditor General's report.

Ms. Jane Doe and Ms. Beverly Bain were in attendance and delivered a presentation to the Board with regard to the Auditor General's report. Prior to Ms. Doe's presentation, Chair Mukherjee directed that Ms. Doe not be filmed, taped, photographed or identified by name pursuant to court order.

The Board approved the following Motions:

- 1. THAT the Board receive the foregoing reports from the Auditor General and the Chief of Police and receive the presentations and the deputation;**
- 2. THAT the Board endorse the recommendations of the Auditor General;**
- 3. THAT the use of force training be brought into compliance with the provincial legislation immediately and that the Chief of Police provide a report to the Board for its April 26, 2007 meeting identifying how the compliance will be ensured;**
- 4. THAT, with respect to the issue of compliance with legislation, Service procedures and Board policies, the Chief of Police report to the Board for its April 26, 2007 meeting on what processes are in place to assess and ensure compliance as well as deal with non-compliance and how those processes can be strengthened;**

5. **THAT only qualified coach officers be permitted and that performance evaluations be reviewed immediately to ensure compliance with Board policy and Service procedures;**
6. **THAT, on a “go forward” basis:**
 - (a) **the Chief of Police provide the Board with a report for its April 26, 2007 meeting containing a list of the conferences and/or seminars which the Toronto Police Service has committed to host, sponsor or organize in 2007 and beyond, and that the report include the rationale for each of the events, estimated cost of staff and resource involvement, and expected benefits to the Service;**
 - (b) **with the exception of the conferences and/or seminars that may be noted as a result of Motion 6(a), the Toronto Police Service not commit to hosting, sponsoring or organizing any other conferences and/or seminars until the Board establishes, in consultation with the Chief of Police, a policy governing conferences and/or seminars;**
 - (c) **the Chair bring forward a policy to the June 14, 2007 meeting of the Board for approval; and**
 - (d) **following the approval of a policy, the Chief of Police provide to the Board for information, the Service Procedure that will implement the policy.**
7. **THAT the Chief of Police provide a report to the Board for its April 26, 2007 meeting on a new staffing model that addresses the recommendation of the Auditor General on coordinating training;**
8. **THAT with respect to the issues raised in the Auditor General’s report about the contents of reports to the Police Services Board, this matter be referred to the Chair for discussion with the Chief of Police and that the Chair report to the Board with respect to the outcome of the discussions with the Chief of Police;**
9. **THAT the Chief of Police report to the Board on the information technology issues raised by the Auditor General, including the feasibility of HRMS housing the data and performing the functions identified by the Auditor General;**
10. **THAT the Chief of Police report to the Board on the financial controls that the Service has established to ensure the efficient and accountable management of training and conference expenditures;**
11. **THAT, with respect to the policy on donations, the Chair be directed to review the Board’s policy in this area and that, in the interim, the Board confirm that the Board’s Donations Policy which is reflected in Service Procedure 18-08 applies to all**

donations sought by members of the Toronto Police Service, monetary and non-monetary, for any purpose, including donations that may be solicited as a result of conferences or seminars that the Service is hosting on behalf of external organizations;

12. THAT the Chief of Police provide the Board with a comprehensive financial report on the extent and nature of the Service's involvement in the FBI National Conference hosted by the Service and that this report detail all donations received; and
13. THAT the Board request the Auditor General to conduct a review of the implementation of the recommendations in 18 months and that he provide a follow-up report to the Board on the results of the review.

Management Response to the Auditor General's Report on the Toronto Police Service - Review of Police Training, Opportunities for Improvement

Recommendation No. 1

The Chief of Police review the management structure of the training program at the Police Service in order to ensure that accountability and responsibility for the training program throughout the Police Service are clearly defined and, if considered appropriate, assigned to one individual. This individual should be at the appropriate command level, be capable of providing leadership to ensure and enforce appropriate management, compliance, integration of information technology support, and financial controls in all areas of the training program.

Management Comments: Agree

We are in agreement with a review with respect to the management structure. While there has been and remains good compliance within the Toronto Police Service (TPS) with the Skills Development and Learning Plan; this has been achieved through the use of moral suasion rather than positional leadership and enforcement.

Structurally, accountability exists through formalized channels. The Service, through the Chief of Police, and the Police Services Board (PSB) are both accountable for the funds utilized. There is a very extensive budgetary process where every expenditure is examined 'line by line' and is supported by detailed documentation for the expense. These expenditures are approved by several layers of management. In particular, the training program falls under the control of the Deputy Chief, Human Resource Command who entrusts the management and accountability of the Training and Education (T&E) Unit to a Superintendent.

The review will entail the feasibility and appropriateness of placing all corporately-sponsored training and education under the direction of the Superintendent – Training and Education. Course training standards (CTS) will be warehoused at the College. Nevertheless, certain mandated training interventions, for example hostage rescue training at the Emergency Task Force, are properly housed and controlled there. Hence, the level of control and leadership by an individual member will need to be clearly defined.

With respect to the recommendation for ‘integration of information technology support’, training records management is completed through the use of Human Resource Management System (HRMS) and Time Management Resource System (TRMS). There exists no single assessable database that provides all of the information as noted in the audit. The creation of a ‘training records management system’ would provide a platform for single source information sharing and retrieval. However, to create such a system, has an attendant cost that is currently not within the TPS budget.

Action Plan / Time Frame

Commencing January 2007.

Recommendation No. 2

The Chief of Police assess the Toronto Police Service’s relationships with police training organizations both within and outside Canada. The Training and Education Unit be directed to investigate best practices in all areas of police training including e-learning and simulation training and develop working relationships with other major international police service training organizations. Such a relationship to concentrate on the exchange of training practices, information and training technology. Further, the Chief of Police evaluate the costs and benefits of joining the Canadian Police Knowledge Network (CPKN). The Training and Education Unit be required to report to the Chief of Police on a regular basis with details of the relationships formed along with information collected on best practices.

Management Comments: Agree in Part

The T&E Unit has maintained relationships with the Canadian Police College and the Ontario Police College, thus facilitating the free-flow of information concerning police training best practices nationally and provincially. Additionally, senior management are representative members of the Canadian Association of Chiefs of Police (CACP) - Human Resources Committee and the Ontario Association of Chief of Police (OACP) - Training Steering Committee. The audit noted that there was no involvement or “focused attention on police training organizations such as the International Managers of Police Academies and College Trainers.” In fact, this organization meets once per year at the International Association of Chiefs of Police (IACP) conference. For some time, the TPS had senior management representation in the organization noted by the Auditor General; however the benefits to the TPS of continued membership were very minimal, therefore, the membership was allowed to lapse.

The audit questions the role of the TPS in hosting international training conferences. In the context of learning best practices as they exist throughout the world, members attending such conferences can create these valuable links and allow the TPS to learn of different service delivery practices. Networking by conference attendees can be valuable in exploring new developments, whether those are be in police training or other police related activities.

Extensive research has been conducted into membership with the CPKN. The TPS worked, at the national level, for over two years on the establishment of CPKN. Currently, the Superintendent of the T&E Unit is a member of the Board of Governors of CPKN. An assessment of the costs to the TPS for accessing CPKN training interventions was found to be prohibitive. The current pricing model is based on a percentage of the workforce and has an adverse impact against large police services. The TPS has undertaken to create a new fee schedule with the CPKN that will allow for meaningful participation.

Action Plan / Time Frame

This is an ongoing initiative.

Recommendation No. 3

The Chief of Police ensure that the total costs of all training are summarized, accounted and budgeted for and disclosed separately. The training costs should include all training provided by the Toronto Police Service including training provided by the specialized units, training provided by divisional training sergeants, and costs relating to the organization of various conferences and seminars. Such training costs should be benchmarked against other major police services within Canada, the US and the UK.

Management Comments: Agree in Part

The audit notes that “training costs should be benchmarked against other major police services.” This benchmarking process has a large caveat. It is imperative that any other comparator service use an extremely similar Cost Benefit Analysis (CBA) template for there to be a proper comparison. When benchmarking, it is vital to recognize that concepts, definitions, components (and the methods used for calculating the components), and ratios may not be similar across all agencies involved in the benchmarking process. For example, agencies may offer different types of training, use different methods to deliver the training, may have different class sizes, may have different training facilities/resources, may have different 'student' populations, and so on. As much as possible, concepts, definitions, components, and ratios must be standardized.

With respect to benchmarking costs for similar training delivered elsewhere, this occurs at the T&E unit on a case-by-case basis. Costs are compared for courses offered by Ontario Police College (OPC) and Canadian Police College (CPC) to determine if the TPS should access those programs or offer in-house training. Specific examples include the Leadership Training models and the OPC drug course. In the first case, a TPS partnership is much more cost effective than similar CPC or OPC courses. In the second case, the TPS drug course was discontinued and all

drug officers attend OPC. When performing these analyses, delivery and attendance costs are both considered.

Action Plan / Time Frame

Commencing in January 2007 and as an ongoing initiative.

Recommendation No. 4

The Chief of Police ensure that the Toronto Police Service is in compliance with the Equipment and Use of Force Regulation of the Police Services Act. The training program at the Training and Education Unit be amended to accommodate legislative requirements.

Management Comments: Agree

It cannot go un-stated that technical non-compliance with the Use-of-Force Regulation at no time placed any member of the public at risk. At no time was any police officer allowed to carry a firearm who was incompetent to do so. Training, such as that provided on the Advanced Patrol Training (APT) course has ensured that all TPS officers are competent and confident with all use-of-force options, tactics, and crisis resolution skills.

The T&E Unit anticipated this audit finding and detailed plans have been put in place that will ensure strict compliance during training year 2007 and thereafter. This will fully address this recommendation but may entail some additional costs. Should any be incurred, these costs will be tracked in the manner recommended elsewhere in the report by the Auditor General.

Due to the serious limitations of the existing training facilities (i.e., there are only 18 positions for officers on the firing range), the T&E Unit will discontinue the current Advanced Patrol Training (APT) and Undercover Officer Tactical Safety Courses for the years 2007 to 2009 inclusive. These will be replaced with a newly designed annual 3-day program. This program will include use-of-force re-qualification, officer safety and tactics, crisis resolution, domestic and relationship violence, human relations and procedural updates. Once the new facility opens, T&E will be able to reinstate the Advanced Patrol Training (APT) and Undercover Officer Tactical Safety Courses for all officers.

Action Plan / Time Frame

Commencing late January 2007.

Recommendation No. 5

The Chief of Police direct all members of the Toronto Police Service that they are required to comply with all policies and procedures issued by the Chief, as well as directives approved and issued by the Toronto Police Services Board.

Management Comments: Agree

The Chief of Police has directed all Service members to be familiar with and conduct themselves in accordance with all Service Governance. This direction is currently contained in the Service's Standards of Conduct issued, in the form of a pocket-sized manual, to all members. As well, this document is available electronically on the Service Intranet. A routine order will be published as a 'reminder' for all members.

Service Governance includes:

- Police Services Board Policies and By-laws;
- Toronto Police Service Collective Agreements;
- Standards of Conduct;
- Service Governance Definitions;
- Policy and Procedures Manual;
- Routine Orders;
- Specialized manuals issued by the Chief of Police;
- Unit operating procedures issued by their Unit Commander;
- CPIC messages; and
- Direction from a superior.

Action Plan / Time Frame

Commencing February 2007.

Recommendation No. 6

The Chief of Police consider the implementation of an internal control process where compliance with legislation, as well as compliance within policies and procedures, is verified on a sample basis by the Internal Quality Assurance Group. Such a sample be determined on a priority/risk basis. Instances of non-compliance be reported to the Chief of Police and dealt with through the disciplinary process.

Management Comments: Agree In Part

The Chief of Police has created an Inspections Team which examines high-risk areas and compliance with procedures. As well, the Audit & Quality Assurance Unit considers compliance with policies and procedures in the areas that are being audited. Instances of non-compliance will be reported through the appropriate chain of command to the Chief of Police, which may result in disciplinary action.

Divisional Policing Command (DPC) has agreed to review their 'StatCom' tool as a portal for capturing issues of compliance and regularly and consistently reporting upon those findings.

Action Plan / Time Frame

Ongoing.

Recommendation No. 7

The Chief of Police direct all Unit Commanders that under no circumstances should there be any contravention of the Policy (Policy 14-03) relating to coach officers. Only first class constables who are qualified and trained pursuant to Policy 14-03 should be assigned as coach officers.

Management Comments: Agree

The Chief of Police has directed all Service members to be familiar with and conduct themselves in accordance with all Service Governance. This direction is currently contained in the Service's Standards of Conduct issued, in the form of a pocket-sized manual, to all members. As well, this document is available electronically on the Service Intranet. A routine order will be published as a 'reminder' for all members.

Additionally, the TPS will undertake a review of Procedure 14-03 to ensure that it meets the current needs of the Service and reflects best practices. For example, the review must determine whether the restriction to only first-class constables is bona-fide in nature

The 'StatCom' tool can be adapted to capture coach officer training records as well as indicating the member's current role. The tool will recognize members who are currently active coach officers and will indicate when each officer was trained. This will assist in measuring true capacity. For example, qualified officers who are listed as coach officers may have been promoted, transferred or otherwise unavailable for coach officer duties. This process will allow for a purging and updating of all the coach officers' records and ensure that previously identified coach officers still remain in the role. The StatCom tool has the potential ability tool to identify this type of anomaly and reconcile the record immediately.

Action Plan / Time Frame

Commencing in January 2007 and as an ongoing initiative.

Recommendation No. 8

The Chief of Police direct the Training and Education Unit to set up an internal control management information process to ensure that only qualified officers attend the coach officers course. Non-qualified officers not be permitted to attend the coaching course.

Management Comments: Agree

As previously noted, the TPS will undertake a review of Procedure 14-03 to ensure that it meets the current needs of the Service and reflects best practices. For example, the review must determine whether the restriction to only first-class constables is bona-fide in nature.

Once that determination has been made, both DPC and the T&E Unit will employ their monitoring processes to ensure that only qualified officers attend the coach officers' course. The T&E Unit has implemented this recommendation and DPC will provide an additional layer of quality control through the 'StatCom' tool.

Action Plan / Time Frame

Commencing in January 2007 and as an ongoing initiative.

Recommendation No. 9

The Chief of Police determine, on an ongoing basis, the projected longer term requirements for trained police coach officers. The analysis takes into account those police officers who have received coach officer training but who are no longer eligible to perform coaching responsibilities. The Training and Education Unit be required to amend the number of training courses provided for coach officers in order to meet projected demands.

Management Comments: Agree

This recommendation has been partially implemented in that the T&E Unit have already increased class sizes to meet organizational needs. T&E frequently amends the number of training courses provided for coach officers in order to meet projected demands.

As previously noted, the TPS will undertake a review of Procedure 14-03 to ensure that it meets the current needs of the Service and reflects best practices. For example, an examination of the procedure is required to determine the bona-fide nature for eligibility, including whether there exists a need for a sunset clause on eligibility.

Although shortage of coach officers is not a common concern, the reconciliation of coach officer training records with the officer's current function may allow for processes such as 'parked coach officers', who can be reactivated if and when they return to the field-based divisional policing duties..

Action Plan / Time Frame

Commencing in January 2007 and as an ongoing initiative.

Recommendation No. 10

The Chief of Police review the length of the coaching time provided by coach officers to probationary police officers in order to ensure that it is at an appropriate level. Further, the amount of classroom time provided to probationary police officers be reviewed with a view to substituting classroom learning with alternate training methods such as e-learning.

Management Comments: Agree

The TPS field training is shorter than most other major police services noted within the Auditor General's report. Historically, the amount of field training has varied but has actually reduced in length from 12 weeks in the 1970's to its current level of 10 weeks. Policing in Toronto, now, is admittedly more complex. That said, recipients of 10 weeks of field training in the Toronto context may not be qualitatively compared to 10 weeks in another jurisdiction.

The TPS supports the maximum use of on-the-job training possible. However, the current situation of maximizing this type of training is limited by coach officer remuneration issues. The Collective Agreement between the PSB and the Toronto Police Association (TPA) notes at article 16:04 that a "constable who is assigned to coach a recruit during the first ten (10) weeks of the recruit's initial assignment, shall; receive" compensation in addition to their regular salary (emphases added). The language is clear that coach officers are not entitled to additional remuneration after the first ten weeks. Given the need for additional field-based training and the fact that some subject matter currently taught in a classroom format could be covered in field-based training, any additional costs would be justifiably mitigated. It is the contention of management that the PSB waive a strict interpretation of this article and allow for qualified coach officers to be compensated while training a new recruit. A maximum time frame could be determined.

With respect to substituting classroom learning with alternate training methods, such as e-learning, field-based training will address this in part. The use of e-training interventions also can be used for portions of recruit training once technical, process and human resource management issues have been addressed.

Action Plan / Time Frame

Commencing in January 2007 and dependent upon Police Service Board approval.

Recommendation No. 11

The Chief of Police ensure that field training activity evaluation reports for probationary officers are completed by all coach officers on a timely basis, reviewed, and authorized by appropriate supervisory staff. For those probationary officers who have not been exposed

to the operational or administrative activities required in the field training report, unit commanders be required to adjust coaching periods to ensure that all appropriate training is completed. Probationary officer training should continue until all such operational or administrative activities contained in the field training activity report are completed.

Management Comments: Agree

The 'Field Training Activity Evaluation Report' was not available through 'JetForms' on the Services computer infrastructure until the earlier part of 2006. This issue has been rectified. The routing instructions call for the form to be completed and then placed in the recruit officer's file. The routing and copy instructions will be changed so that a copy of the report will be forwarded to the T&E unit, which will maintain a centralized register for all Field Training Activity Evaluation Reports

A routine order will be published in the near future advising all units of the change.

Action Plan / Time Frame

February 2007.

Recommendation No. 12

The Chief of Police review the current procedure concerning the appointment of coach officers to specifically address circumstances where such officers are the subject of a substantiated public complaint. The procedure should also address the steps to be taken when existing coach officers are the subject of a public complaint.

Management Comments: Agree

As previously noted, the TPS will undertake a review of Procedure 14-03 to ensure that it meets the current needs of the Service and reflects best practices. Currently, the TPS has clearly delineated standards that address an officer's eligibility for promotion. Similar standards can be used for coach officer eligibility. Proposed standards include:

- Successfully passed the use-of-force qualification as articulated in Ontario Regulation 926;
- Not have been convicted for a criminal offence for which a pardon has not been obtained - proof of pardon must be produced, in cases of absolute or conditional discharges, proof, from the Royal Canadian Mounted Police (RCMP), that the records have been sealed must be produced;
- At least two years with a clear discipline record since the date of the finding of guilt by a Hearing Tribunal for a misconduct offence;

- Are not subject to an appeal as a result of any finding of guilt for misconduct of a Hearing Tribunal;
- Not under suspension;
- Have conformed, presently conforming and continuing to conform to the Service's Core Values

The TPS has an internal computer database that tracks complaints and discipline, the Professional Standards Information System (PSIS). An audit mechanism may be possible in the PSIS system to flag ineligible officers for coaching duties. This will require further exploration to determine its technical feasibility, associated costs and any legal issues surrounding disclosure of complaint information.

Action Plan / Time Frame

January 2007.

Recommendation No. 13

The Chief of Police be required to develop a long term strategic training plan to address the number of police officers required to be trained for various specialized units within the Toronto Police Service.

Management Comments: Agree

The Service has adopted a 'Demand Factor Model' that allots staffing levels to Divisional Policing Command (DPC). The model has an additional guideline of allowing a maximum of 20% of police officers out of uniform duties at any one time. This model therefore provides for the number of potential candidates for specialized training.

The precise units that are 'specialized' must be defined. Typically, specialized units, like the Emergency Task Force or Marine Unit have self-sustainable training programs that are based on provincial or federal standards. Individual specialized units should and continue to be responsible for ensuring timely and meaningful training. The standards for this training can be 'warehoused' at the T&E unit under the direction of the Superintendent.

On a Service-wide basis, training for specialized functions across the TPS is not a discreet system. Other human resource systems have an impact on a long-term strategic training plan including succession planning and staff development. The TPS is fully supportive of any corporate level human resource forecasting processes, which could be implemented to reduce uncertainty and enable improved long-range planning. For example, one complementary method to facilitate such a process would be the completion a corporate specialized function needs assessment. However, there would be noticeable costs associated with this initiative.

Action Plan / Time Frame

One to two years for implementation due to the strategic nature of the recommendation and the number of human resource systems involved.

Recommendation No. 14

The Chief of Police evaluate the Human Resource Information System in order to ensure that the capabilities of the system are being used appropriately and to their full potential. Once determined, such information be communicated to all appropriate staff and, in addition, training specific to the reporting capabilities of the system be provided to all appropriate staff.

Management Comments: Agree

The current Human Resource Management System (HRMS) has some functional limitations, which may not meet the overall need for a training records database. More examination is required in this area. The current HRMS is a non-relational database. Data mining and retrieval is extremely difficult, if possible at all. One of the major barriers to monitoring compliance at the corporate level is the lack of position specifications for police officers within the TPS. Because there is no way to identify (except within the unit) which function an officer is performing, it is difficult to verify that the officer meets all of the training requirements for the function. Hence, there is a reliance on Unit level systems. As a result, it is not inconceivable that officers may carry out functions for which they are not trained, qualified or accredited. This is a risk-management issue, which requires redress.

Other system limitations include its lack of user-friendliness. System upgrades, reconfigurations and training for personnel will not be cost-neutral.

As part of the review, the 'StatCom' reporting and management tool is currently being revised to include a training records management component as well as projective and forecasting module. Depending on the results of this evaluation, this database tool may have the required utility to meet the Service's training requirements.

Action Plan / Time Frame

One to two years for implementation due to the strategic nature of the recommendation and the probability of upgrades being required for HRMS, which is a 'capital budget' issue.

Recommendation No. 15

The Chief of Police ensure that training is being provided for all high priority courses. Lower priority courses not be provided when there are shortfalls in meeting demands for high priority courses.

Management Comments: Agree

All training will be the subject of a TPS Service-wide policy that will address the issue of high priority courses being offered first and foremost.

With respect to the example cited in the audit, vacant staff positions within the Investigative training team of the T&E Unit was a contributing factor to the differential. Other staff members, within the T&E Unit, were unqualified to deliver the cited training. This anomaly is not standard or accepted practice.

Action Plan / Time Frame

January 2007.

Recommendation No. 16

The Chief of Police ensure that, wherever possible, Toronto police officer attendance at each Advanced Patrol Training Course is maximized taking into account operational requirements.

Management Comments: Agree

The Advanced Patrol Training (APT) course is changing format in 2007. The average attendance has hovered at approximately 75 officers for the past several years. Without further exhaustive reviews, this may be the reasonable capacity level from DPC. The new format has a maximum course load of 72 officers, with courses operating twice per week versus the current once weekly format.

The T&E Unit will continue to report APT attendance to the DPC Staff Superintendents for compliance and attendance modifications. The 'StatCom' tool and process includes an APT compliance component that provides attendance summary records and a predictive model piece. 'StatCom' tool is currently addressing the need for more comprehensive records management and retrieval. This process should augment the current system by February 2007. A developmental APT training module has been built and is currently being tested.

Action Plan / Time Frame

Commencing in January 2007 and as an ongoing initiative.

Recommendation No. 17

The Chief of Police review the content of the Advanced Patrol Training Course in order to ensure that the training provided is relevant and required on an annual basis. For non-mandatory training, consideration be given to providing such training either through an e-learning facility or by training sergeants at the divisions.

Management Comments: Agree

With the newly proposed APT course, all training sessions will be mandatory under the 'Skills Development and Learning Plan' at priority levels 1, 2 or 3. Legislative requirements, idest firearms re-qualification, will take precedence over all secondary training issues.

E-learning is seen as part of a viable solution, however it requires the development of a complete infrastructure and administrative process. Ideally, with the full implementation of e-learning interventions, they will eventually be viewed as common as crafting an occurrence on a workstation.

Action Plan / Time Frame

Commencing in February 2007 and as an ongoing initiative.

Recommendation No. 18

The Chief of Police ensure that Toronto police officers be permitted to attend training courses only if the required prerequisite qualifications have been met. Prerequisite qualifications include attendance at a prior course or a requirement that officers be at a certain rank within the Toronto Police Service. The Training and Education Unit be assigned responsibility to ensure that this takes place.

Management Comments: Agree

The TPS agrees to undertake a review of all pre-requisite qualifications for training. This review will include a re-examination of prerequisite courses, equivalency standards, experience, or other acceptable courses. Furthermore the review will ensure training currency and examine the validity of any pre-requisites. Courses offered by the T&E Unit are more easily controlled for pre-requisite qualifications. At this time, the T&E Unit has no codified or actual control over Unit-level course assignments. This will be amended as stated in the response to Recommendation No.1.

An internal mechanism must be in place to screen for compliance. All pre-requisite standards must be fully and thoroughly communicated to assist with compliance .

Action Plan / Time Frame

Commencing February 2007.

Recommendation No. 19

The Chief of Police direct that attendance by Toronto police officers for specific training be verified based on a predetermined approved demand. Toronto Police officers not be provided training in areas which are not relevant to their current and short-term future responsibilities. Criteria be established to determine the most appropriate time period for required training prior to an officer assuming the relevant responsibilities.

Management Comments: Agree

Training for specialized functions across the service is not a discreet system. Other human resource systems have an impact on a training plans including succession planning and staff development. The TPS is fully supportive of any corporate level human resource forecasting processes, which could be implemented to ensure officers selected for training will use that training in their current role or in a short-term future position. This will require a course-by-course, subject-by-subject needs assessment to provide a reasonable estimate for the appropriate time period for which an officer may receive training prior to assuming new responsibilities. Otherwise, the use of a carte-blanch standard may place the TPS in risk-management jeopardy (idest – periods too long to retain skills); conversely, time bands that are too short may be impractical for training administration. In any event, there will be noticeable costs associated with this required needs assessment.

Action Plan / Time Frame

Commencing mid-2007 dependent upon approval of cost associated with the required needs assessment.

Recommendation No. 20

The Chief of Police evaluate all training courses at the Toronto Police Service, including those courses delivered by the specialized units in order to ensure that the length and content of all such courses is appropriate. In particular, the Chief of Police review the scenes of crime officer training to determine the need and the value of the extensive field training provided by the Toronto Police Service.

Management Comments: Agree in Part

Specialized units will be directed to provide clarification and training information in each training course offered by their unit. This information will be forwarded to the T&E Unit for review in a manner noted in Recommendation No.1. This report shall include the rationale for the length of training and any legislative requirements that deem it necessary. Ideally, an electronic record will be located at the T&E Unit for referral.

It is the position of the T&E Unit that TPS training is generally the same length as, or shorter, than similar training offered by OPC, CPC, and other similar Police Services. Nonetheless, a review will be undertaken to confirm or refute this position.

The audit focused on the Scenes of Crime Officer (SOCO) course as an example of a course that may be too lengthy. The comparator was the SOCO course offered by the OPC, which is the only other SOCO course in Ontario. The comparator may not be appropriate and it is important to understand the difference between the training offered at the OPC and the TPS.

The TPS course is 8 days of class lecture and 17 days of field training while the OPC training is 10 days in total divided between class lectures and simulation exercises. The Auditor General notes that OPC indicates the training it offers equips officers to perform scenes of crime duties “except for the need to become familiar with any unique operational requirements relative to their own police service”. The current length of the TPS course is warranted for a number of reasons including the complexity of policing in Toronto, the large number of calls for service and different types of investigations attended by SOCOs in Toronto.

Unlike the OPC, TPS provides training by scientists at the Centre of Forensic Sciences in DNA evidence collection and Gunshot Residue Kits. With the Toronto Anti-Violence Initiative Strategy (TAVIS) focus on reducing gun violence in the city, the need for this additional training is obvious and requires no debate. The busy, complex urban environment of Toronto creates challenges and workload demands not experienced by other Police Services in Ontario and the proven structured mentoring system used by the TPS produces a higher level of quality required by the service and the community it serves.

While not cited in the audit, it is noteworthy that, on page 58 of the Ontario Police College 2007 Calendar, the SOCO Course is described as being “designed for persons to be assigned as Scenes of Crime Officers mentored by a Forensic Identification Officer” (emphasis added). The OPC course provides a SOCO with the basic training required prior to mentoring.

Since 1990, Forensic Identification Officers (FIO’s) at Forensic Identification Services (FIS) have mentored SOCO trainees after completion of the classroom portion of the training. It was recognized that FIS had no control over the quality of the mentoring available at the divisional level and by keeping the SOCO trainee at FIS for a complete work cycle, the quality of their work is evaluated in a live environment where remedial action is taken, if necessary. At the end of training, the SOCO trainees complete a written and practical examination. The mentoring was introduced to ensure the SOCO trainees were able to carry out the technical skills they were taught and apply them to crime scene investigation. During this time they are also exposed to some situations where they learn how to assist FIO’s.

In addition to the mentoring, there are other differences between the OPC and TPS programs, despite using the same provincial Course Training Standard. OPC provides 10 days of classroom and simulation instruction. TPS provides 8 days. The shorter classroom-based instruction and use of field-based instruction is consistent with other recommendations made by the Auditor General. The OPC (in their calendar) suggests students become familiar with Scenes of Crime Procedures, equipment and terminology in their own service prior to enrolment. TPS

incorporates this training into the course. The OPC has a 'Dynamic Simulation Area' for students to practice their skills in a more realistic environment. The TPS has no dedicated practical area and uses improvised scenarios at FIS. TPS relies on real crime scenes for SOCO trainees to practice their skills under direction of a FIO.

For the reasons noted, the Service believes that the SOCO training provided is appropriate in length in order to address the necessary content and field experience necessary to performing SOCO duties in Toronto.

Action Plan / Time Frame

With respect to evaluating courses, other than the aforementioned SOCO course, this shall commence February 2007 and be an ongoing initiative.

Recommendation No. 21

The Chief of Police review the training evaluation process to ensure that evaluations submitted by course participants are appropriately summarized and analyzed for management analysis and review. All summaries be reviewed by the Manager of the Training and Education Unit to ensure that all suggestions for change or amendment to course content are considered and where appropriate incorporated into future training courses.

Management Comments: Agree

This recommendation is partly implemented. However the information is not easily retrieved since it is generally not electronically stored. An electronic records management system is warranted. This will assist with retrieval and accurate analysis of surveyed evaluations. Industry standard hardware and software, for example, a 'Scantron' or similar device, should be purchased to permit machine marking of evaluation forms like other training organizations. A TPS policy requiring approval and post-course reporting for all TPS training will be developed, thus allowing proper evaluation and results reporting.

Action Plan / Time Frame

Commencing in March 2007 and as an ongoing initiative.

Recommendation No. 22

The Chief of Police review the evaluation process relating to the effectiveness of training particularly in regards to the impact of training for on-the-job performance as well as its impact on the Toronto Police Service as a whole. Consultation be initiated with the Ontario Police College, major international police services and private sector training organizations in order to ensure that the Toronto Police Service can take advantage of the evaluation methodology being developed and used elsewhere.

Management Comments: Agree in Part

Evaluation of training interventions is essential. In theory, the TPS agrees that training should be evaluated within several contexts including those noted in the four levels of Dr. Donald Kirkpatrick's model. This widely-accepted model of evaluation is "difficult, time consuming and therefore costly" to quote the Essex Police authority as cited in the Auditor General's report. Even the Research and Evaluation Unit of the OPC, comprising four research persons, some with Ph.D.'s, readily admit that evaluating training at the 'transfer of learning' and 'impact of learning' is in its early formative stages. To have a similar expert capacity in the TPS would be a resource-rich solution. Any reliance on these institutions to evaluate our training has limited utility as they service many other policing agencies in addition to the TPS. However, OPC research staff has assisted the TPS with training reviews in the past, although their capacity to help is limited.

The 'Survey of Training and Learning Practices in the Metropolitan Toronto Police Service' (Alex Lowy, March 2, 1992), noted that a unit like T&E should have a research capability in the form of a section of staff devoted to this area. It currently has none. Again, the creation of a research unit is not cost-neutral. A business case will be developed for the 2008 budget submissions.

The audit notes that "consultation be initiated with the Ontario Police College" and other training entities. This has occurred and many of are facing the same evaluative dilemmas that the TPS faces. These consultations will continue with a view to locating industry-standard, best-practice evaluation methodologies for use in the TPS.

Action Plan / Time Frame

Due to budgetary considerations and long-term nature of 'results' or 'impact' level evaluation, the time frame for this recommendation commences late 2007 and is ongoing.

Recommendation No. 23

The Chief of Police ensure that all costs incurred in organizing annual international conferences are accurately and properly accounted for. Such costs to include all Toronto police officers salaries and any other administrative costs. The results of this analysis determine the viability of continuing to host international conferences. In any event, conference registration fees be determined after taking into account all organizational

costs. Further, the Chief of Police review the procedure in connection with the carry forward of individual conference surpluses to future years.

Management Comments: Agree

This recommendation points to a cost versus benefit scenario with respect to the conferences and seminars the TPS hosts. The issue of creating a CBA template was addressed in the response to Recommendation No. 3. Costs will be predicted and adjusted accordingly. The issue of costs will include officers' on-duty time as part of the total cost. Given that 'cost' is one part of a CBA, the 'benefit' aspect must be also be properly scrutinized. For example, a comparison of the total costs of a hosted conference against the cost of sending TPS members externally for the same type of course training (including items such as travel costs, time to travel, per diems, cost of the course and any other related fees) will provide a proper and more full view of the viability of hosting conferences. From a qualitative aspect, the hosting of international training events also raises the profile of the City of Toronto with the additional benefit of attendees spending money on hotels, restaurants, et cetera.

With respect to any surplus funds remaining after a conference or event has completed, it is agreed that the TPS review any related policies concerning carry-forward amounts.

Action Plan / Time Frame

Commencing March 2007 and as an ongoing initiative.

Recommendation No. 24

The Chief of Police review the benefits of the Toronto Police Service organizing annual international conferences for the benefits of a majority of participants who are external to the Toronto Police Service. Such an evaluation be documented and take into account the costs and the relative merits of training both internal and external participants. Further, the Chief of Police give consideration to determining whether or not it is the role of the Toronto Police Service to organize international conferences on an annual basis, particularly when the Toronto Police Service procedure states that "units may from time to time find it necessary to host or plan Toronto Police Service authorized seminars."

Management Comments: Agree

A review would benefit the overall effectiveness of Service-sponsored conferences. A CBA may suggest that the funding including 'opportunity costs' are not defensible. 'Opportunity costs' refer to the salary and benefit costs of those members arranging conferences, attending courses et cetera. Although there are no additional budget monies required for officers to give, receive or arrange training, while doing so, officers are not engaged in their primary functions - other than full-time trainers. Hence, the term 'opportunity costs', notes the cost of the opportunity to engage in training. The actual arranging and facilitation of a course or conference is not without

certain other benefits to the Service. These experiences assist members with their organization, budget and administrative skill sets. These are qualitative benefits that can not be located on a balance sheet or exit survey.

As articulated in the response to Recommendation #2, it is beneficial to the Service to be aware of practices in all areas of police training and to develop working relationships with other major international police service organizations. The Auditor General's report had a clarion message that TPS training must measure itself against best practices elsewhere. The hosting of conferences and seminars provide an avenue to accomplish both these goals. Again, the measurable benefit of these particular events must be off-set against the true expenditure including opportunity costs.

Action Plan / Time Frame

Commencing March 2007 and as an ongoing initiative.

Recommendation No. 25

The Chief of Police ensure that evaluations are completed for all future annual conferences and seminars organized by the Toronto Police Service. Evaluations be independently collated and summarized by the Training and Education Unit and results communicated to conference and seminar organizers. Such evaluations be one of the determinants for continuing future conferences and seminars.

Management Comments: Agree

The independent collation and summary of conference evaluations serves as metering stick for approval and acceptance. In the response to Recommendation No. 21, it was noted that a sound electronic records management system is warranted to assist with retrieval and accurate analysis of surveyed evaluations. Industry standard hardware and software would assist greatly, for example, a 'Scantron' or similar device, should be purchased to permit machine marking of evaluation forms. To repeat the earlier response, a TPS procedure requiring approval and post-course reporting for all TPS training will be developed.

Base on the analysis of these evaluations, the T&E could provide an independent appraisal based on conference critiques and evaluations. As noted by the Auditor General, this would only be one determinant when considering the continuation of any conference or seminar.

Action Plan / Time Frame

Commencing in March 2007 and as an ongoing initiative.

Recommendation No. 26

The Chief of Police direct that those Toronto police officers responsible for organizing conferences and seminars be required to comply with all Toronto Police Service policies and procedures including those relating to the procurement of conference related goods and services.

Management Comments: Agree

The Chief of Police has directed all Service members to be familiar with and conduct themselves in accordance with all Service Governance. This direction is currently contained in the Service's Standards of Conduct issued, in the form of a pocket-sized manual, to all members. As well, this document is available electronically on the Service Intranet.

Additionally, the relevant Service Procedures will be reviewed to ensure they meet the current needs of the Service and reflect best practices. As part of this review, a mechanism will be developed to ensure that the process is being followed and compliance is documented. Once reviewed, any revised procedure will be published on Routine Orders for the information of all members.

Action Plan / Time Frame

Commencing in March 2007.

Recommendation No. 27

The Chief of Police give consideration to the coordination and consolidation of all conference related budgets. Attendance at conferences be approved subject to the attendance meeting the overall priorities of the Toronto Police Service.

Management Comments: Agree

The consolidation of budgets for attendance at conferences has been implemented with approvals at the Deputy Chief / Chief Administrative Officer level. These budgets are predetermined through conference requests projected by the individual units in the previous year's budget process. Accountability for conference budget planning exists as the budgetary process is examined 'line by line', through the PSB, and is supported by detailed documentation for the expense. Unexpected conference training courses can be facilitated through the chain of command and appropriate Staff Superintendent / Director. Attendance is subject to approval by command officers.

Action Plan / Time Frame

Implemented and ongoing.

Recommendation No. 28

The Chief of Police direct that the procedure in connection with the reporting requirements for Toronto police officers, in connection with conference, seminar or course attendance, be complied with.

Management Comments: Agree

The Chief of Police has directed all Service members to be familiar with and conduct themselves in accordance with all Service Governance. This direction is currently contained in the Service's Standards of Conduct issued, in the form of a pocket-sized manual, to all members. As well, this document is available electronically on the Service Intranet.

Additionally, the relevant Service Procedures will be reviewed to ensure they meet the current needs of the Service and reflect best practices. As part of this review, a mechanism for reporting and managing centralized records must be developed. As well, this mechanism must ensure that the procedure is being followed, in the longer term, and that documentation of this compliance exists. Once developed, any revised procedures will be published on Routine Orders for the information of all members.

Action Plan / Time Frame

Commencing March 2007.

Recommendation No. 29

The Chief of Police assess the training programs delivered by the Training and Education Unit to determine whether or not there are alternative and more cost effective methods of delivery. All new training requirements be evaluated in regard to the most appropriate method of delivery. In addition, the concept of e-learning should be further developed particularly for "refresher" training. Procedures be developed in regards to the evaluation of e-learning opportunities, as well as the scheduling of such training. In addition, the increased use of simulation training should also be reviewed and special consideration be given to an evaluation of the simulation training technology currently in use in the UK and elsewhere.

Management Comments: Agree in Part

The TPS is fully supportive of any practical initiative involving any type of technology which will reduce costs of training and time away from front-line duties. E-learning is vital and an important component to training when associated to some of the training opportunities that

policing provides. E-learning is comprehensive and has the potential for greater accessibility than in-class training sessions.

The drawback to some e-learning interventions is the limitations of its ability to test for knowledge. Testing is typically limited to the lower taxons. Although a test can be administrated, it is not governed by the strict standards of an in classroom test. For example, a 'closed book examination' is easily proctored in a classroom but it is nearly impossible to do in the non-contiguous learning environment of computer-based training interventions. More robust e-learning interventions also have an associated higher cost but can test at the higher levels of the taxonomy, such as the use of interactive branching video embedded in an e-training module. One other difficulty exists, although not insurmountable, which is the ongoing maintenance and support of the information technology (IT) infrastructure required for e-learning.

Currently, the TPS recognizes the value of e-learning and has amended the course reimbursement procedure to include e-learning. Much of the leadership training offered in the TPS is currently offered solely on-line.

The Auditor General rightfully notes that learning, which simulates real-life, is one of the most effective tools for the transfer of skills. In terms of simulation training for course matter taught by the TPS, the APT and Police Vehicle Operations make extensive use of this. Further simulation or immersive training is possible, but can have attendant costs associated with it, for example, costs associated with the purchase of simulation software and /or hardware.

Action Plan / Time Frame

Mid 2007 and as an ongoing initiative.

Recommendation No. 30

The Chief of Police ensure that Toronto police officers who have been assigned instructional responsibilities have attended the required "train the trainer" courses or their equivalent.

Management Comments: Agree

This recommendation is similar in nature to Recommendation No.18, in that there is a need to assess if the officer has the necessary skills to perform the function or has received similar/equivalent training elsewhere. This process requires formalization and a process of documentation.

The majority of instructors at the Charles O. Bick College have successfully completed the Instructional Techniques course (ITC). Additionally, they have completed content-specific train-the-trainer courses. Trainers, not assigned to the T&E Unit also require a similar process of trainer accreditation. However, the ongoing turnover in personnel has created a demand for the course that is nearly overwhelming. Therefore, the train-the-trainer courses, like the ITC, will be

designated to those that are / will be required to teach in their daily duty of tour. This proposal will include Divisional Training supervisors, who have daily training duties.

Action Plan / Time Frame

Implemented and as an ongoing initiative.

Recommendation No. 31

The Chief of Police review all non police related training courses to determine if their delivery could be conducted more effectively by civilian instructors.

Management Comments: Agree

The review of positions held by police officers with a view to civilianization is an ongoing process in the TPS. Several reviews of the training positions and courses within Training and Education have been completed in recent years. Thus, the recommendation is fully implemented. Reviews consider the required skills sets, appropriateness of the use of civilian instructors and a cost benefit assessments. The T&E Unit has civilianized, or outsourced, a significant number of training courses including First Aid, Cardio-Pulmonary Resuscitation (CPR), all Information Technology (IT) Training, all Physical Training (PT), significant amounts of leadership training, and portions of ethics and train-the-trainer training.

Action Plan / Time Frame

Implemented and as an ongoing initiative.

Recommendation No. 32

The Chief of Police consider restricting the length of time Toronto Police Officers are assigned as training instructors to the Training and Education Unit at the C. O. Bick College. Police instructors from the C. O. Bick College be reassigned to police divisions.

Management Comments: Agree

Management agrees to consider this recommendation. Part of this consideration will be a determination of the feasibility of undertaking such a task. The TPS invests a great deal of money and resources into creating qualified training instructors. Cycling of instructors too quickly may create inconsistent training. Therefore, careful consideration must be given to tenure that balances the need for full benefit of the investment made in the training officers versus the need to rotate in officers from the current environment of the field on a subject matter basis. For the greater part, there is sufficient attrition, through promotion, transfer and retirement at the College, that there is turnover in Police College faculty.

Conversely, the cycling of officers will provide benefits to the membership through greater opportunity for staff development for officers transferring to the T&E Unit as well as providing units immediate access to a subject matter expert for those returning to field-based policing duties. Additionally, the college would benefit by maintaining current field perspective. This will provide another layer to instructional credibility. Specific tenure for instructors, generally, is supported by the TPS.

Action Plan / Time Frame

Commencing February 2007 and as an ongoing initiative.

Recommendation No. 33

The Chief of Police ensure that the Toronto Police Service is in compliance with its Use of Force and Equipment Service Firearms Procedure which requires that when a police officer is absent from duty for an extended leave of absence (over 20 working days) or a serious illness or injury, the firearm along with the related equipment shall be retrieved under the direction of the Unit Commander and delivered to the Armament Office for safekeeping.

Management Comments: Agree

This procedure requires review as it predates the installation of gun vaults within police facilities and legislative requirements for gun vaults in an officer's residence, who elects to carry her or his firearm home. Previously, firearms were stored in 'cubby holes' devoid of locks or doors in police stations. Admittedly, firearms were not nearly as securely stored. The current risk or threat is negligible, since firearms are securely stored.

Pending review of the policy, compliance will be monitored via the 'StatCom' Tool, which will be provided with an on-going records, captured from Medical Services. This information will be made available to the Unit Commanders and provide an alert for exceeding the designed threshold. As a redundancy in compliance, the Inspections Team will include this procedure as part of their unit inspections criteria and, when the T&E Unit becomes aware of such a situation, they will notify the respective Unit Commander to ensure compliance.

Action Plan / Time Frame

Commencing February 2007 and as an ongoing initiative.

Recommendation No. 34

The Chief of Police ensure that the procedure requiring an annual inspection of firing ranges is complied with.

Management Comments: Agree

Inspections are being done by the Service's Armament Officer on an annual basis but the records capture of this information was absent. Documentation of this process will begin and carriage of the process will be the responsibility of the TPS Armament Officer.

Action Plan / Time Frame

Immediate and as an ongoing initiative.

Recommendation No. 35

The Chief of Police direct that any sponsorships or donations received for conferences or for any other specific purpose are properly approved, in accordance with Policy 18-08, by the Unit Commander or by the Toronto Police Services Board as required. The Chief of Police further ensure that all other provisions of the Policy are complied with.

Management Comments: Agree

The Chief of Police has directed all Service members to be familiar with and conduct themselves in accordance with all Service Governance. This direction is currently contained in the Service's Standards of Conduct issued, in the form of a pocket-sized manual, to all members. As well, this document is available electronically on the Service Intranet.

Procedure 18-08, entitled 'Donations', will be reviewed to ensure that it meets the current needs of the Service and reflects best practices. A recent review did occur in 2005. The current threshold of \$1500, without PSB approval, has been in existence for several years and should be revisited to at least include the annual rate of inflation.

All information concerning donations is centrally captured by the Chief's Office and made accessible through the Executive Officer of the Chief's staff.

Action Plan / Time Frame

Immediate and ongoing.

Recommendation No. 36

The Chief of Police ensure that, in accordance with policy, a central registry of all donations is maintained by the Chief's Executive Office and details of all donations received or declined is reported to the Toronto Police Services Board semi-annually. Unit Commanders of all Divisions be advised of this requirement and a protocol be set up for the regular reporting of all such information to the Executive Office.

Management Comments: Agree

In compliance with Procedure 18-08, a central registry of all donations is maintained by the Chief's Office and the details of all donations received or declined are reported to the Police Services Board. As per the Board's direction these reports are submitted annually. Procedure 18-08 will be amended to reflect this annual reporting process. Once amended, the revised procedure will be published on Routine Orders for the information of all members.

Action Plan / Time Frame

Commencing February 2007.

Recommendation No. 37

The Chief of Police ensure that performance standards are developed for all training activities throughout the Toronto Police Service. Such standards to apply to the Training and Education Unit, other training conducted by specialty units and training conducted at the divisional level.

Management Comments: Agree

The audit defines 'performance standards' as the recording and tracking of time within the TRMS. TRMS has some functionality with respect to this area, but also has limitations. Project codes are limited to three per person per day. It is highly conceivable that these codes could become exhausted especially if 'training time' is segmented into various categories like delivery, design, research et cetera. Assuredly, having a computer capability to measure training time, which easily translates to a costing, would be a beneficial measure for evaluating training. Data entry would require strict protocols to ensure consistency across the Service. The TRMS software may require upgrading, which will have a cost attached.

The TPS is working with a consultant, retained by Human Resources, in a current review of HRMS and TRMS. From a training perspective, the concerns on improving this area by standardizing codes to better track on-duty attendance at training have been expressed. The addition of position codes to police officer positions will also be very advantageous.

Action Plan / Time Frame

Ongoing.

Recommendation No. 38

The Chief of Police review the policy relating to the reimbursement of tuition fees for Toronto police officers attending university or college courses and direct that any

reimbursement of tuition fees to Toronto police officers be restricted to those university or college courses directly related to the policing responsibilities of the officer.

Management Comments: Agree in Part

Prior to 2005.02.10, Service Rule 6.12.1 did not make reimbursement dependent on its benefit to the Service. The prevailing assumption at that time was that education in general resulted in benefit to the member and the Service. At the Chief's request, the Service Rules governing this issue were deleted by the PSB in 2005.02.10 (Min.No.P44/05 refers). It has since been the practice of the Service to only reimburse tuition fees for courses that are of direct benefit to the Service.

This direction was incorporated into the Skills Development and Learning Plan authored by the T&E Unit. As well, a new Service Procedure addressing the attendance and reimbursement of learning opportunities has been developed and will be published shortly on Routine Orders for the information of all members. The Auditor General's report was silent on civilian members, although the newly updates procedure extends to them as well.

Some level of autonomy must be afforded to unit commanders, when deciding upon the relatedness of a course to a police officer's duties and responsibilities. On their face, some courses may not appear to be police related but may form part of a member's work. – exempli gratia, a group facilitation course for a police officer responsible for community mobilization since facilitating group processes is a key competency for neighbourhood officers.

Action Plan / Time Frame

Implemented and ongoing.

Recommendation No. 39

The Chief of Police review the level of tuition fees charged to police officers from other police services or from other organizations attending courses organized by the Toronto Police Service with a view to charging amounts which are more in line with actual training costs. In addition, any tuition fees waived for police officers attending from other police services or organizations be appropriately authorized in writing.

Management Comments: Agree in Part

Management agrees to review the levels of tuition fees charged to other Police Services. The immediate impact of any substantial increase in fees would be an increase in revenue. However, to remain consistent with the Auditor General's Recommendation No.2 (fostering partnerships), the TPS develops a great deal of goodwill delivering training to other services. This results in creating positive relationships. Charging higher rates may be result in negative consequences to the TPS such as loss of reciprocity and goodwill. The TPS relies on 'in-kind' resources possessed by neighbouring police services (Public Safety Unit, Marine Unit, air services) and

any increase may affect the spirit of cooperation and productivity and ultimately result with increased reciprocal costing charged to the TPS. The Police Services Board has directed the Service to enter into Memoranda of Understandings (MOU's) to assist in these situations.

Within the T&E Unit, there is a unit-specific policy, developed in conjunction with Finance, to set fees for training. This policy will be reviewed and updated, as necessary. Within T&E any tuition fees waived for police officers attending from other police services or organizations be appropriately authorized in writing. External police officers attending TPS sponsored training, offered outside of the T&E Unit, will be the subject of the same TPS policy requiring written authorization

Action Plan / Time Frame

January 2007 and as an ongoing initiative.