

AUDITOR GENERAL'S REPORT

**Municipal Licensing and Standards,
Investigation Services Unit –
Efficiencies Through Enhanced Oversight**

November 30, 2012

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EXECUTIVE SUMMARY

The Auditor General's annual audit work plan included a review of the Investigation Services Unit in the Municipal Licensing and Standards Division.

The objective of this review was to assess operational controls over activities performed by the Investigation Services Unit.

Investigation Services ensures compliance with City by-laws

The Investigation Services Unit enforces provisions of the Toronto Municipal Code:

- to ensure properties are maintained at standards that increase the quality of life in the City; and
- to ensure that specific safety concerns and emergencies within the authority of the Municipal Code are addressed in a timely manner.

Role of the Municipal Standards Officers

The Investigation Services Unit employs Municipal Standards Officers (MSOs) who enforce City by-laws. MSOs inspect and investigate private property to ensure compliance with legislative requirements in order to maintain a high level of public safety, neighbourhood integrity and cleanliness.

\$20.31 million and 210 staff to enforce by-laws

The 2012 approved gross operating budget for the Investigation Services Unit is \$20.31 million with budgeted revenues of \$2.64 million for a net operating budget of \$17.67million. The approved complement for the Unit was 210 staff positions.

Lack of oversight is major finding

The central theme throughout this report relates to the lack of effective management oversight in the Unit both at the financial and at the operational level. The lack of oversight has resulted in:

- A less than effective and efficient organization
- Non compliance with certain policies and procedures
- Less than reliable and complete financial and management information.

Absence of management oversight has compromised internal controls

The absence of an adequate level of oversight has compromised certain controls within the Unit and may have resulted in lost revenue to the City. For example, our review of information contained within the Unit's management information system identified almost 10,000 by-law violations which were the subject of a re-inspection by MSOs. Re-inspection visits are subject to a fee which in each of the 10,000 cases was not charged. While there may be valid reasons for the waiving of such fees, we could not determine that this was appropriate as the documentation supporting the waiving of fees was not completed nor could we find any evidence that the waiving of fees had been approved.

Performance not subject to management review

The lack of management oversight was also evident during our review of the Unit's performance objectives. In the case of emergency related complaints for example, public safety may have been compromised. Emergency complaints are required to be addressed within 24 hours. In many cases, this objective was not met. There does not appear to be any review or monitoring of performance standards and, as a result, no action is being taken to address performance which is below standards. The absence of a monitoring process to ensure that emergency complaints are dealt with on a timely basis is a significant concern and requires immediate attention.

Management oversight has not been a priority

Other issues identified throughout the report point to a culture where management oversight has not been a priority at many levels in the Unit. To be candid, many supervisors are not supervising and likewise, many managers are not managing. This report very clearly should serve as a catalyst for this culture to change. Without a strong commitment to change there is a risk to public safety and the possibility of revenue losses to the City.

Conclusion

This report includes 13 recommendations. The recommendations address the need for an increased level of oversight and an assessment of opportunities to redeploy resources. Implementation of the recommendations in this report will significantly improve the administration of the City's response to by-law complaints.

Action taken to address recommendations

We have had a number of discussions with the Executive Director of MLS and steps have already been taken to address many of the recommendations in this report.

BACKGROUND

***2012 Budget of
\$20.3 million***

The 2012 approved gross operating budget for the Investigation Services Unit is \$20.3 million with budgeted revenues of \$2.6 million. The total approved staff complement for the Unit was 210.

***MSOs located in
four districts
throughout the
City***

The Investigation Services Unit employs Municipal Standards Officers (MSOs) who enforce various City by-laws. A team of MSOs is located in each of four districts throughout the City. Inspections conducted by these MSOs are mostly complaint driven. There is also a dedicated group of MSOs who deal with multi-residential apartment buildings and graffiti complaints.

***Two specialized
teams***

In addition, there are two specialized teams operating from a central location in the south east end of the city. One team deals with waste on public property and the other deals with by-law enforcement in City parks. Most of the inspection activities by these MSOs are not complaint driven but result from proactive initiatives.

***Notices inform
owner of
violation and
time allowed for
correction***

MSOs either respond to complaints through inspections and investigations to determine if there is non-compliance with municipal by-laws. When MSOs identify violations, they issue a Notice of Violation or an Order. Notices issued by an MSO will specify the violation and a date when compliance is required.

***Inspection fees
for ongoing non-
compliance***

In 2009, the City introduced inspection fees for situations where voluntary compliance was not achieved within the time allowed in either a Notice or an Order. These situations often require repeated inspections to confirm compliance was achieved.

***96% voluntary
compliance***

In the few cases where voluntary compliance cannot be obtained, court action may be initiated. The City maintains high levels of voluntary compliance and reported 96 per cent compliance for 2010.

Remedial action may be taken by the City at owner's expense

Follow-up inspections are conducted by MSOs to confirm compliance. If a subsequent inspection indicates that the infraction was not remedied, then for certain by-laws, the City may take action to remedy the problem at the owner's expense. Any subsequent enforcement action is based on the significance of the non-compliance.

IBMS is used to record and track status of investigations

The Investigation Services Unit uses the corporate Integrated Business Management System (IBMS) to process and track complaints, monitor investigations and record information. Staff use wireless devices to document results from an inspection while in the field. This information is then uploaded to IBMS using wireless devices.

Over 61,000 complaints investigated in 2011

In 2011, the Investigation Services Unit dealt with more than 61,000 requests for an investigation in the district offices. MSOs conducted over 115,500 inspections and issued over 18,000 Notices and 6,000 Orders. In addition, there was a substantive amount of proactive work performed by the waste and parks group of MSOs.

Top five by-laws requiring enforcement

Five City by-laws accounted for 81 per cent of investigations related activity in the districts in 2011:

By-Law Investigations	Complaints	Proactive	Total
Property Standards	16,936	4,357	21,293
Waste (private property)	6,631	2,570	9,201
Graffiti	3,921	4,405	8,326
Signs	3,409	2,590	5,999
Zoning	4,030	696	4,726
Total	34,927	14,618	49,545

AUDIT OBJECTIVES, SCOPE AND METHODOLOGY

Annual work plan

The Auditor General's annual audit work plan included a review of the Investigation Services Unit in the Municipal Licensing and Standards Division.

Audit objectives

The objective of this review was to assess controls related to operational activities performed by the Investigation Services Unit. More specifically, the objectives included:

- reviewing enforcement activities and related financial transactions to ensure they are being conducted in compliance with legislative requirements and Corporate policies and procedures
- exploring opportunities to improve operational effectiveness and efficiencies
- reviewing the integrity of the operational and financial information contained in IBMS
- assessing how management information reports from IBMS support operational activities in the Unit.

This audit covered the period from January 1, 2011 to August 1, 2012.

Audit Methodology

Our audit methodology included the following:

- review of relevant legislation
- review of policies and procedures
- review of Committee and Council minutes and reports
- interviews with MSOs, supervisors and managers
- review of investigation records
- review and analysis of management information available in IBMS
- evaluation of management controls and practices
- review of Core Service Review Report prepared by KPMG LLP.

Compliance with generally accepted government auditing standards

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

AUDIT RESULTS

A. MANAGEMENT OVERSIGHT IS DEFICIENT

A.1. Performance Objectives Are Not Achieved

Performance objectives developed

The Municipal Licensing and Standards Division (MLS) has established organizational and individual performance objectives for its Investigation Services Unit.

Responses for emergency complaints do not meet standards

One of the most important performance objectives was a requirement that there be a 100 per cent response to emergency complaints within 24 hours. In 2011, the Division's actual performance was a 67 per cent response rate within 24 hours. Emergency complaints generally impact public safety and should be dealt with immediately. Any level of performance which is below the standard of 100 per cent within 24 hours is a major cause for concern and should be addressed immediately.

Performance objectives need to be revised

In the 2012 operating budget, the 100 per cent objective was arbitrarily reduced to 75 per cent. In our view, under no circumstances should this service objective be below 100 per cent.

Two examples of emergency complaints relate to contraventions of the provisions in the Fences By-Law pertaining to swimming pool enclosures and the by-law pertaining to Refrigerators and other Appliances, Abandoned. In both of these cases, any failure to deal with complaints immediately has the potential for significant and serious public safety consequences.

62% of non-emergency complaints received a five day response

Other service objectives that were not achieved included the need to provide an initial response to non-emergency complaints within five days for 90 per cent of the complaints received (achieved 62 per cent) and completing an investigation and closing a file in 60 days or less for 85 per cent of investigations (achieved 73 per cent). On average, the Division took 73 days to close an investigation.

Performance expectation of six inspections per day per MSO

In addition, the Division maintains a performance expectation for each MSO that they complete an average of six inspections per day. Our review of 2011 information, (see Exhibit 2), indicated that on an overall basis only one of the four districts achieved an average of six inspections per day per MSO.

No oversight of performance

There is no effective review, analysis and oversight of individual staff and organizational performance. The absence of any review compromises the usefulness of performance objectives.

Recommendation:

- 1. City Council request the Executive Director, Municipal Licensing and Standards to:**
 - a. review and, where appropriate, amend individual and organizational performance objectives particularly those pertaining to emergency complaints**
 - b. develop a quality assurance program to ensure that there is an ongoing review of staff's performance against objectives**
 - c. ensure that appropriate action is taken to address performance which does not meet the established standard.**

A2. The Investigation Services Unit Does Not Have Clear and Up-to-Date Policies and Procedures

Although the Investigation Services Unit maintained policies and procedures for specific by-laws, there were no standards to direct staff on the expectations for recording the progress and appropriate closure of an investigation.

Re-inspections conducted long after the date specified for compliance

We identified a number of instances where follow-up inspections were conducted long after the expiry dates on notices and orders issued by the MSOs. In many cases, including emergency complaints, we could not find evidence that a re-inspection was completed and the infraction was resolved.

All emergency complaints need to be adequately investigated, resolved and documented

Our review of a sample of seven emergency complaint files related to enclosures around pools identified three cases where MSOs did not comply with either internal policies and procedures or the City by-law. Examples of non-compliance included not conducting an inspection within the 24 hour response requirement, failure to issue a violation notice and no record of the re-inspection to confirm compliance and resolution.

Lack of attention given to emergency complaints

The fact that policies and procedures pertaining to emergency complaints are not being followed is an extremely serious issue and immediate action needs to be taken to address such shortcomings. Of equal significance is the fact that the instances of non compliance were not identified through any supervisory review and as a result no action was taken.

Even if policies and procedures were followed in all three cases the lack of documentation in support of the work conducted is an issue that also needs to be immediately addressed. There is no indication of any supervisory review or sign off relating to these particular files.

194 investigations assigned to staff who were on leave or no longer working in the Unit

There is no effective management review process to identify those files which have been closed or are in progress.

Our review of reports available from IBMS identified 194 investigations which were assigned to staff who were no longer working for the Unit or were absent from work for extended periods due to sickness or long term disability. We determined that 86 of these investigations were still active. An appropriate and adequate level of documentation was not always on file to determine the status of these 86 investigations.

Subsequently, management directed staff to further review these files and, where appropriate, additional inspections were conducted to ensure that complaints had been addressed. If an appropriate level of documentation was available at the outset the re-inspection would likely not have been required. In these circumstances resources could have been better used elsewhere. There is also an issue of poor customer service where additional unnecessary inspections are required.

Recommendation:

- 2. City Council request the Executive Director, Municipal Licensing and Standards to:**
 - a. develop and document organizational expectations for recording the progress and closure of investigations**
 - b. develop a management oversight process to ensure that policies and procedures and expectations are complied with. Particular emphasis be placed on the review of all emergency related complaints. The oversight process include appropriate levels of documentation and evidence of supervisory approval**
 - c. develop a process to ensure that investigations are assigned to appropriate staff with particular emphasis on reallocating files from staff who are absent for significant periods of time.**

B. A FORMAL TRAINING PLAN AND PROGRAM DOES NOT EXIST

Training has not been a priority

In 2005, a divisional training program was launched and to date a significant number of training manuals have been developed. However, due to budget restrictions and workload demands, training has not been a priority. Consequently, on the job training is the major form of training for all MSOs.

It appears that since 2009 the training provided to staff has been minimal. Training records for the most part consist of attendance records for specific training sessions. Detailed information on training received by each staff member is not available.

Proper staff training helps ensure consistency in enforcement activities, enhances efficiency of operations and ensures MSOs are effective in their interactions with members of the public.

Recommendation:

- 3. City Council request the Executive Director, Municipal Licensing and Standards to:**
 - a. develop and implement a formal training plan for all Municipal Standards Officers**
 - b. maintain documentation relating to training received for all Municipal Standards Officers**
 - c. training records be reviewed by management on a regular basis to confirm that all Municipal Standards Officers have received an appropriate level of training.**

C. OPPORTUNITIES EXIST TO IMPROVE OPERATIONS

C.1. Human Resources Should Be Deployed to Meet Service Demands

Each MSO handles complaints for a certain ward

Each MSO is responsible for a certain area within their district. New complaints are assigned to MSOs based on the address of the complaint irrespective of the work load of each MSO. Our analysis indicated that certain MSOs carry significantly higher caseloads than others. For example, MSOs in the West district handled significantly more inspections per day relative to other districts.

The assignment of new investigations to MSOs and the deployment of MSOs to the various districts should be monitored in order to ensure that there is an equal distribution of work load. Where appropriate and possible, staff redeployment should be considered.

41 MSOs deal with waste on public property

There are 41 MSOs dedicated to dealing with waste on public property primarily on a proactive basis. These officers are all centrally located in one office. At the time of our review no management reports were available from IBMS to monitor the performance of these MSOs. There may be opportunities to redeploy these staff, or adjust their responsibilities, to assist with heavier district workloads.

Other specialized MSO operations

There are also three other dedicated teams of MSOs, (31 staff in total), to deal with city parks, graffiti and multi-residential buildings. Much of the work conducted by these MSOs is proactive in nature and, in the case of work relating to City parks, seasonal. In the case of the dedicated multi-residential building staff, they only deal with issues relating to common areas in the buildings they visit. There are likely opportunities to redeploy these staff on a seasonal basis or when required by workload levels.

MSOs are also the first responders to complaints about trees. Our understanding is that although the officers respond to these complaints, they know very little about trees and invariably refer the complaint to Forestry staff. Efficiencies are likely possible if staff assigned as first responders are able to address the issue, that is, Forestry staff for tree complaints.

Business hours are 8 a.m. to 4 p.m. Monday to Friday

Finally, the majority of staff conduct inspections during the hours of 8.00 a.m. to 4.00 p.m. from Monday to Friday and are required to physically report to their office at both the beginning and end of their shift. The work hours for the most part make it difficult to contact homeowners and inspect certain premises. Further, the pre and post shift reporting requirement reduces the amount of time in the field. It may be appropriate to review whether or not the current shift schedule and requirement to attend at the office should be amended.

Recommendations:

- 4. City Council request the Executive Director, Municipal Licensing and Standards to:**
 - a. review the ongoing allocation of workload of Municipal Standards Officers with a view to ensuring there is an equal distribution of work load**
 - b. consider changing the current hours of work to correspond better with the times when most owners of properties are available**
 - c. re-evaluate the requirement for Municipal Standards Officers to physically attend the office at the beginning and end of every shift.**

- 5. City Council request the Executive Director, Municipal Licensing and Standards, in consultation with the General Manager, Parks, Forestry and Recreation to determine if tree complaints can be addressed more efficiently.**

C.2. Use of Technology to Support Operations Requires More Attention

Wireless devices are used by MSOs working in the community

Staff in the Investigations Unit use wireless devices in the field to connect to IBMS. With the current technology, staff are able to receive, send and update data to IBMS while they are offsite. During our interviews with staff, one of the consistent issues with using wireless devices related to the establishment and maintenance of a network connection. Field staff consistently lose their wireless connection to IBMS resulting in inefficiencies in recording and transferring data.

Remote handheld devices issued by MSOs contain a number of standard checklists. These checklists facilitate the efficient documentation of inspection information which is uploaded to IBMS. There are opportunities to increase the use of checklists so that the manual input of information into IBMS is minimized.

Recommendations:

- 6. City Council request the Executive Director, Municipal Licensing and Standards to review opportunities to increase the use of standard checklists on remote devices used by Municipal Standards Officers.**
- 7. City Council request the Executive Director, Municipal Licensing and Standards to resolve the current network connectivity problems pertaining to the remote telecommunication devices.**

C.3. Use of Corporate Versus Personal Vehicles

Most MSOs use personal vehicles to enforce by-laws

The Investigation Services Unit has 56 vehicles used primarily by the dedicated waste enforcement and parks MSOs. All other MSOs use their own personal vehicle for inspection activities. MSOs are reimbursed for mileage travelled based on pre-approved reimbursement rates.

The existing fleet of vehicles are mostly pickup trucks since the staff using these vehicles are required to pick up waste items in the course of their duties. The vehicles are generally assigned to one staff member and not available for use by other officers even if scheduling would facilitate such use.

The use of personal vehicles by MSO staff for inspection purposes should be evaluated for a number of reasons.

- To evaluate the costs and benefits of purchasing vehicles for MSOs as opposed to reimbursing staff for mileage expenses.
- To determine whether or not there may be safety issues in using personal vehicles for inspection activities.

MLS's 2013 budget includes a request for a pilot project providing corporate vehicles to a selection of MSOs. On completion of the pilot project, the Executive Director will report back on results and recommendations for moving forward.

Recommendation:

- 8. City Council request the Executive Director, Municipal Licensing and Standards to report back to Council, as outlined in the 2013 budget request, on the results of the pilot project providing corporate vehicles to Municipal Standards Officers.**

D. FINANCIAL AND ADMINISTRATIVE CONTROLS REQUIRE IMPROVEMENT

D.1. IBMS Not Effective in Generating or Recording Fee Information

Process for recovering costs is cumbersome and inefficient

Numerous MLS enforcement activities result in fees and costs being recovered from property owners. The enforcement activities generating these amounts are recorded in IBMS. However, IBMS does not automatically bill for these activities, nor are the fees always accurately recorded in IBMS. Rather, information must be extracted from IBMS, forwarded to Policy, Planning, Finance and Administration Division for billing and recording in the Financial Information System.

The current process results in invoices being delayed up to three months. In addition, the deficiencies in fee information in IBMS means that MSOs do not have ready access to this information for their day to day interactions with property owners.

Recommendation:

- 9. City Council request the Executive Director, Municipal Licensing and Standards and the Chief Information Officer to enhance the Municipal Licensing and Standards Division billing process for enforcement activities in a manner that ensures such information is readily available to enforcement staff. Such enhancements to ensure:**
 - a. billings are done on a timely basis**
 - b. billings are complete and accurate**
 - c. billing information is readily available in IBMS**
 - d. the process is automated to increase efficiencies.**

D.2. Re-inspection Fees Are Not Being Recovered As Required by the By-Law

13 of 14 investigations with repeated inspections related to an infraction had no fees charged

Chapter 441-2 of the Municipal Code requires that property owners be billed for re-inspections where an offence subject to an order has not been rectified.

Our review of a sample of investigation files revealed that in 13 of 14 files MSOs did not charge re-inspection fees even after confirming the violation was not remedied. It was apparent based on the information contained in these files that inspections were required anywhere from three to six times.

Approximately 16,000 repeated inspections for violations in 2011 with no fees

Information from IBMS indicated that approximately 10,000 re-inspections in 2011 had no fees charged. In our review of a sample of files, we found a significant number of instances where fees should have been charged and were not.

The minimum fee where a re-inspection is required is \$94. Although we cannot confirm that fees should have been charged in all these cases, if the minimum charge was applicable the additional cost recovery would have been approximately \$940,000.

Adequate controls needed to ensure fees are applied

IBMS currently allows staff to by-pass the requirement to charge a re-inspection fee where it is required. Effective system controls and supervisory review are critical in preventing such occurrences. The Inspection Services Unit does not have adequate controls to ensure re-inspection fees are being properly and consistently applied. We also noted a small number of instances where re-inspection fees were recorded but waived by supervisory staff.

There are occasionally valid reasons for waiving re-inspection fees. However, discretion to waive fees is not included in the Municipal Code. Staff are technically in violation of the Code in waiving fees. The Code should be amended to permit staff to waive fees in certain circumstances.

Recommendations:

- 10. City Council request the Executive Director, Municipal Licensing and Standards, in consultation with the City Solicitor, to make the necessary changes to the Municipal Code to allow for the waiving of fees where appropriate.**
- 11. City Council request the Executive Director, Municipal Licensing and Standards to ensure that re-inspection fees are billed to property owners as required by the Municipal Code.**

D.3. Inadequate Controls to Ensure Costs for Remedial Action are Recovered

City may do remedial work at person's expense

In some cases, remedial work required in a Notice or Order is not performed by the specified date. For certain violations the City has authority to carry out remedial work in the absence of action by a property owner. Once the work has been completed the City may recover the costs of the remedial work from the property owner by adding the amount to the tax roll.

\$730,000 for remedial action in 2011

The City maintains contracts for certain anticipated remedial services. The MSOs oversee the work performed by the contractor and invoices are approved by management. In 2011, the expenditures for all remedial work performed was approximately \$730,000. We were not able to quantify the extent, if any, to which these costs were not recovered.

We note that during 2011 a review of old outstanding amounts was performed and \$223,000 in remedial costs that apparently should have been billed to property owners was identified as uncollectible. These amounts were written off in 2011.

We understand that MLS, in consultation with the City Solicitor, have made changes to processes that should reduce uncollectible amounts on a go forward basis. However, closer attention needs to be given to monitoring the recovery of remedial costs to ensure that all amounts are billed to, and collected from, property owners where appropriate.

No established policies exist for remedial costs

At the time of our review, there were no established policies and procedures to ensure remedial costs incurred by the City were effectively managed to ensure recovery of funds. The lack of established procedures and inadequate supervision has contributed to the City not being able to recover all remedial costs. Improved policies and procedures are required to ensure the City recovers remedial costs where appropriate.

In addition, the amounts written off in 2011 were not reported to Council as required by the Financial Control By-Law. Staff indicate that these amounts were never set up as receivables and therefore were not write-offs but rather adjustments and corrections. From our understanding, many of these amounts should have been billed to property owners. The fact that the amounts were not set up as receivables and reported to the Treasurer is a technicality. In our view, the amounts are actually write-offs that should have been reported to the Treasurer for inclusion in reporting to Council.

Recommendations:

- 12. City Council request the Executive Director, Municipal Licensing and Standards to establish adequate policies, procedures to ensure recovery of remedial costs incurred by the City.**
- 13. City Council request the Deputy City Manager and Chief Financial Officer to clarify with divisional staff the requirement to report all account write-offs to City Council.**

CONCLUSION

This report presents the results of our review of the Investigation Services Unit in the Municipal Licensing and Standards Division. Addressing the recommendations in this report will significantly improve the administration of the City's response to by-law complaints.

EXHIBIT 1

Examples of Toronto Municipal Code Sections Enforced By Municipal Licensing and Standards, Investigation Services Unit

Chapter 363, Building Construction and Demolition Article V

Article V in this chapter deals with right of entry on private property.

Internet: http://www.toronto.ca/legdocs/municode/1184_363.pdf

Chapter 447, Fences

A by-law with respect to fences on private property.

Internet: http://www.toronto.ca/legdocs/municode/1184_447.pdf

Chapter 480, Garage Sales

A by-law regarding frequency and content of garage sales.

Internet: http://www.toronto.ca/legdocs/municode/1184_480.pdf

Chapter 485, Graffiti

A by-law regarding graffiti on private property

Internet: http://www.toronto.ca/legdocs/municode/1184_485.pdf

Chapter 489, Grass and Weeds

A by-law regarding grass and weeds on private property.

Internet: http://www.toronto.ca/legdocs/municode/1184_489.pdf

Chapter 497, Heating

A by-law regarding heating in rented accommodations.

Internet: http://www.toronto.ca/legdocs/municode/1184_497.pdf

Chapter 548, Littering and Dumping of Refuse

A by-law to prohibit the littering and dumping of waste on public and private land.

Internet: http://www.toronto.ca/legdocs/municode/1184_548.pdf

Chapter 591, Noise

A by-law to regulate noise in the community.

Internet: http://www.toronto.ca/legdocs/municode/1184_591.pdf

Chapter 608, Parks

A by-law regarding the conduct of people in parks as well as the use the City parklands.

Internet: http://www.toronto.ca/legdocs/municode/1184_608.pdf

Chapter 629, Property Standards

A by-law regarding the maintenance of property standards.

Internet: http://www.toronto.ca/legdocs/municode/1184_629.pdf

Chapter 632, Property Vacant or Hazardous

A by-law regulating vacant properties.

Internet: http://www.toronto.ca/legdocs/municode/1184_632.pdf

Chapter 659, Refrigerators and Other Appliances, Abandoned

A by-law to prohibit and regulate the abandonment of refrigerators and other appliances.

Internet: http://www.toronto.ca/legdocs/municode/1184_659.pdf

Chapter 693, Signs

A by-law to prohibit and regulate the placement of certain signs in the community.

Internet: http://www.toronto.ca/legdocs/municode/1184_693.pdf

Chapter 835, Vital Services, Discontinuance of

A by-law to discontinue vital services.

Internet: http://www.toronto.ca/legdocs/municode/1184_835.pdf

Chapter 841, Waste Collection Commercial Properties

A by-law with waste collection standards and regulations for commercial properties.

Internet: http://www.toronto.ca/legdocs/municode/1184_841.pdf

Chapter 844, Waste Collection Residential Properties

A by-law with waste collection standards and regulations for residential properties

Internet: http://www.toronto.ca/legdocs/municode/1184_844.pdf

Note:

All zoning by-laws, from the former municipalities, which are pending harmonization are also enforced by municipal standards officers in Investigation Services.

EXHIBIT 2

**Investigation Services Unit
2011 Operational Highlights**

Location	Municipal Standards Officer (MSO)	Investigation Requests	Average Inspections per Day per MSO	By-Law Infractions	Average Days to Close an Investigation
North District	20	12,477	5.9	Property Standards Waste Graffiti Fences	69 40 67 160
East District	23	11,949	4.9	Property Standards Waste Graffiti Fences	100 94 69 159
West District	20	15,895	7.3	Property Standards Waste Graffiti Fences	77 52 42 103
South District	37	20,734	5.5	Property Standards Waste Graffiti Fences	72 29 53 113
City Total	100 7 dedicated to Graffiti	61,055			
Waste Enforcement	41	74,214 87% Proactive	7.5		
Parks	10	19,670 97% Proactive	7		

Note: 14 additional MSOs conduct audits in the common areas of multi-residential buildings