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April 27, 2012

Fiona Crean
Ombudsman
Office of the Ombudsman
375 University Avenue, Suite 203
Toronto, ON
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Dear Ms. Crean:

Re: File # 2010-2954

Further to your request, please find below the City's written response to your draft investigation report, dated April 4, 2012 into the Emergency Human Services (EHS) response at the 200 Wellesley Street fire. I appreciated the time extension which you provided for our review of the draft report. I understand the meetings with staff of Office of Emergency Management (OEM) and Shelter, Support & Housing Administration (SSHA) were helpful in relaying our comments with respect to the details of the investigation.

The incident at 200 Wellesley St. E. was extremely complex and challenging, involving many vulnerable individuals with significant needs. The City's first emergency responders (EMS, Fire, Police) were exceptional in their roles, which resulted in no casualties, and I believe it is important to emphasize and reassure our residents of the City's inherent ability to keep our city safe.

The fire resulted in the mass evacuation of 1,200 tenants from Canada's largest social housing building, owned by the Toronto Community Housing Corporation (TCH). Many of the residents affected were extremely vulnerable, with complex and varied social, financial and physical needs, requiring significant City support and assistance.

The City's response to the incident at 200 Wellesley was unprecedented, involving hundreds of staff redeployed from 14 City divisions. Over the four months that the Emergency Reception Centre was open, tremendous service was provided to a very large number of residents who were all safely cared for without any major injury or incident. I would like to recognize the commitment and dedication of the hundreds of staff from fourteen Divisions that were redeployed from their regular work and asked to take on this additional and very challenging role. As with any emergency, it can be unpredictable and

stressful, however in many cases, staff went above and beyond to provide service to the affected residents.

Many of the issues identified through the review occurred within the first few days after the fire, and were quickly addressed in the following days. Flexibility, problem solving and adapting to the unique challenges of each emergency is part of the EHS response. As you are aware, the City has a robust emergency plan in place. Staff continuously work to refine and strengthen our emergency preparedness plans, and I welcome the Ombudsman's assistance in this important review process. Your findings will be used to improve our planning and operational processes.

We are in agreement with all the recommendations that you have made. These support and strengthen the findings of our own internal review of the response. We are in the process of implementing these recommendations as this will strengthen the City's response for future emergencies. We are addressing your recommendations as follows:

1. That directives be established documenting the role of the Office of Emergency Management and the Emergency Planning Unit (EPU) in emergencies.

At the time of the Wellesley fire, the City had the following documents in place:

- 2009 City Emergency Plan approved by Council
- 15 Operational Support Functions (OSF's), signed off by participating Divisions
- Emergency Human Services policy approved by Council

Since the Wellesley fire, significant work has been made in the following areas:

OEM - refined the planning and response roles in the following documents:

- 2011 City of Toronto Emergency Plan as approved by the Toronto Emergency Management Program Committee (TEMPC) on November 24 2011
- Office of Emergency Management "Liaison" role at emergency sites is defined in the Feb. 28, 2011 Emergency Levels Heat Chart, as approved by the Emergency Management Working Group (EMWG) and TEMPC
- Councillor Notification & Roles in an Emergency chart distributed to Councillors January 16, 2012

EPU

- The existing Mass Care Operational Support Function is currently being updated to reflect the 2010 Council approval of the new Emergency Human Services Policy (in consultation with the Office of Emergency Management and the Emergency Management Working Group). This revision will integrate the new policy into the City Emergency Plan, and will document the role of the OEM in the Emergency Human Services response by clarifying:
 - the escalation criteria for neighbourhood emergencies relative to the Emergency Levels in the City Emergency Plan;
 - notification procedure; and
 - the role of OEM at an Emergency Reception Centre when requested by the EHS Incident Commander, as per the approved Emergency Level escalation chart.
2. That the City Manager confirm the EHS Incident Commander is the single point of decision-making authority for emergency human services responses or provide an alternative.
 - The City Manager will issue a memorandum to all Division Heads, TEMPC members, Agencies, Boards, Commissions and Corporations, and EHS partner Divisions clarifying that the EHS Incident Commander is the single point of decision-making authority for emergency human services responses.
 3. That the City Manager ensure a senior manager is available to act as a liaison with elected officials during emergencies.
 - The revised Emergency Human Services Operational Support Function will clarify that a senior manager will be assigned to act as a liaison with elected officials during an Emergency Human Services response.
 - The City Manager will issue a memorandum to all Councillors, clarifying the role of the EHS Incident Commander and the senior manager liaison to act as a point of contact with Councillors during an emergency response.
 4. That a protocol be established for future emergencies regarding inter-divisional communications for staff responders.
 - EHS will review its processes for communications with Divisional responders and establish an enhanced inter-divisional communication plan to improve future responses.
 5. That a single system of record keeping be established to transmit key information between shifts and that this be done in accordance with the City Clerk's "Responsible Record-Keeping Directive" of August 22, 2011.
 - Protocols for record keeping will be established in accordance with the directive identified.

6. That the Emergency Planning Unit develop a Policies and Procedures Manual, and appropriate information for staff responders.
 - Existing documents and procedures will be enhanced and consolidated into a manual to be distributed to TEMPC, the Emergency Planning Working Group, Division Heads and staff responders. In addition, staff will ensure an overview of the City's policies, procedures, roles and responsibilities in relation to an emergency response will be provided to the heads of Agencies, Boards, Commissions and Corporations.
7. That the Vulnerable Populations Protocol be finalized in consultation with relevant expertise such as the Centre for Addictions and Mental Health.
 - The Vulnerable Populations Working Group, which includes representatives from health and mental health organizations such as EMS, Toronto Community Care Access Centres and Toronto Public Health, has been meeting regularly since the 200 Wellesley fire to improve the health services provided to residents at an Emergency Reception Centre.
 - Existing processes have been clarified and updated, and a new terms of reference for the working group has been established, which was submitted to you during your investigation. The working group will continue to enhance and finalize the protocol to further improve these services in future responses.
8. That recommendations 1-7 be completed no later than December 1, 2012.
 - Agreed
9. That the City Manager establish partnerships with external agencies to handle in-kind donations for future emergencies.
 - A Request for Proposals will be issued to solicit interest of agencies with expertise in handling in-kind donations in providing these services in future responses.
10. That the City Manager ensure that staff responders are aware of the City's Emergency Plan and are adequately trained in emergency human services.
 - OEM has an extensive training program that is delivered five times per year, for a total of 480 training spots. The training comprises Basic Emergency Management, Incident Management System 100/200, Emergency Operations Centre.
 - EPU provides training on Emergency Human Services for staff responders.
 - EPU will review and enhance the specialized EHS Emergency Reception Centre training for staff responders.
 - Training dates will be communicated by the City Manager.
11. That recommendations 9 and 10 be completed no later than June 30, 2013.
 - Agreed

12. That evacuees displaced by emergencies be provided with timely and accurate information to the extent possible.
- Efforts have been made in recent years to develop effective processes for communicating with residents during emergencies, including establishing a 'Residents First' principle for communications.
 - These processes will be further reviewed to ensure they are effective in providing timely and accurate information to the extent possible in future responses.
13. That debriefs and lessons learned be done in a coordinated and timely manner.
- A coordinated debrief will occur within 60 days of the resolution of an EHS response with representatives from all participating Divisions and partner agencies, coordinated by SSHA in partnership with OEM.
14. That the City Manager ensure senior public servants respond in a timely way to Ombudsman requests and hold them to the standards set out in his August 4, 2011 directive.
- Upon notice of an investigation, the City Manager's Office re-issues his August 4th directive to affected divisions. Further communication will be established to ensure public servants are aware of the steps involved with an Ombudsman's investigation, and the standards by which they should respond to requests.
15. That all draft protocols and documents referenced in recommendations 1 through 7 be provided to my office for review prior to finalizing them.
- Agreed

As a final comment, from my perspective, it was clear from the outset that TCHC had assumed the lead decision-making authority of emergency response of their tenants. I feel this confusion of roles led to some of the concerns identified in the report. I agree that there is a need to have one point of decision making authority and it should rest with the City's Incident Commander. I will be taking immediate action to ensure clarity of roles and responsibilities between the City and its Agencies, Boards and Commissions. I am confident in future emergencies of this scale, response will meet all of our expectations and all parties will have a clear understanding of decision making and authority.

Thank you for the opportunity to provide input into the draft report. If you have any questions prior to finalizing your report, please feel free to contact me.

Yours truly,



Joseph P. Pennachetti
City Manager

cc: Brenda Patterson, Deputy City Manager
John Livey, Deputy City Manager