

TORONTO PARKING AUTHORITY **PA7.5 Attachment**

POLICY RESOLUTION **1**

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POLICY ITEM: Security Policy and Plan

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1. Introduction**a) Policy Statement**

The Toronto Parking Authority depends on its personnel and assets to deliver its services to the public and its stakeholders and has an obligation to protect employees and the visiting public, preserve the availability of assets and assure the continued delivery of services in an effective, safe and sustainable manner. This Policy and Plan will further enhance the protection of TPA's staff, customers and assets through proactive and reactive security measures, by incorporating the three "tenants" of security: people, procedures and equipment.

It is a shared responsibility of the TPA and its personnel to provide and maintain a safe and healthy work environment. Proper security involves not simply protecting physical property, rather more importantly is key in protecting the health and safety of employees, customers and the public who utilize Parking Authority facilities and services.

Organizational reputation, the uninterrupted reliability of the infrastructure and normal business processes, the protection of physical and financial assets, the safety of employees and customers, attendance at events, and the preservation of public confidence all rely in some measure upon the effectiveness of the security program.

The protective role of Security constitutes a service to the Toronto Parking Authority. The value of such service is better measured by what incidents do not happen than by what does. As a service, security shall be designed to work with and enhance operations where possible. At Authority properties, it is imperative that security be appropriately balanced with accessibility, the implementation of security counter-measures be based on risk, and that the consideration and implementation of physical security measures be coordinated with an examination of root causes.

The Board of Directors of the Authority has engaged the City of Toronto's Corporate Security Division to manage and oversee the Authority's security program pursuant to a Service Level Agreement. In light of this partnership arrangement, this Toronto Parking Authority Security Policy and Plan prescribes the application of proactive and reactive safeguards measures, clear policies and procedures, stakeholder involvement, policy enforcement, the confidential nature of private security concerns or observations, and clear communication of both TPA and Corporate Security expectations in order to meet the above stated objectives.

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b) Policy and Plan Application

The Toronto Parking Authority Security Policy and Plan applies to all Toronto Parking Authority staff. Certain sections of this Plan also apply to contracted Security Guards, contractors, and service providers where referenced.

c) Policy and Plan Objectives

The purpose of the Toronto Parking Authority Security Policy and Plan is to:

- a) provide and highlight the Toronto Parking Authority Security Plan framework;
- b) outline the roles and responsibilities of Toronto Parking Authority employees in keeping Parking Authority assets secure; emphasize security policies and the responsibilities of various staff;
- c) highlight additional policies that relate to security;
- d) highlight relevant legislation and its effect on security at Parking Authority facilities; and,
- e) provide statements on oversight, independent complaints process, access and equity hiring and training, and environmental design measures.

This Policy and Plan is not intended to provide complete, detailed Corporate Security and/or Security Industry standards and guidelines as they relate to security facility classifications, equipment specifications standards, installation standards, testing standards, monitoring standards, etc. These documents may vary depending upon the classification of facility and legislative requirements.

The overall City of Toronto Corporate Security Policy, which by direction of Council informs all City agency security plans, specifies two categories of requirements: mandatory and recommended. As a part of these requirements the word *shall* and *must* are designated as mandatory requirements and the word *should* as a recommendation (except where direct language is quoted from City policies, Acts, Codes, etc.).

As of May, 2019, all editions of Policies, Acts, and Codes referenced in this document were valid. It is however recommended that the latest version of any references be verified prior to being quoted.

d) Scope

An integral part of security is the application of integrated protection afforded by the systematic identification and mitigation of risk. Through managerial, physical and operational practices, TPA and Corporate Security are able to deter, detect, and diminish risk to the safety of employees, customers, the visiting public and all

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stakeholders, as well as the security of assets and information.

Security activities include, but are not limited to: identification of assets and critical infrastructure;

- ▶ threat, risk, and vulnerability identification and analysis; reporting, investigating, and recording of incidents;
- ▶ the creation of security plans, policies, and procedures;
- ▶ deployment personnel and physical security operations and measures;
- ▶ protection of sensitive information and systems; and,
- ▶ liaison with intelligence and law enforcement agencies as necessary.

e) Definitions

Assets

Employees, visitors, customers, facilities, structures, lands, TPA-owned and managed property, devices, etc. Assets can be tangible and intangible.

Corporate Security

A Unit of the City of Toronto, reporting to the Office of the Deputy City Manager of Corporate Services.

Security Guard

A Security Guard under the Private Security and Investigative Services Act, 2005 is defined as “(4) A security guard is a person who performs work, for remuneration, that consists primarily of guarding or patrolling for the purpose of protecting persons or property. 2005, c. 34, s. 2 (4).”

Service Level Agreement

The formal agreement between the City of Toronto's Corporate Security Unit and Toronto Parking Authority assigning oversight and management of TPA's security program to Corporate Security. The SLA will provide the operating framework for the ongoing working relationship between the TPA and Corporate Security, by defining the services to be provided, service levels, roles and responsibilities, timelines and costs mutually expected by both parties. It is not intended to be a legal document, but rather serves the mutual benefit of both parties by providing a clear understanding of agreed upon service requirements and performance criteria.

TPA

The Toronto Parking Authority.

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2. Background

a) City Wide Security Policy

Item EX18.1, Special Meeting of Toronto City Council, March 31, 2008

City Council in considering recommendations contained in a February 4, 2008 report from the City Manager, entitled "City-Wide Security Plan" as part of the budget process that year, approved among other things, that:

- ▶ Further improvements and enhancements be made to the current Corporate Security framework with the objective of enhancing corporate standards and further centralizing those security functions which have City-wide implications.
- ▶ The Corporate Security Unit undertake further consultations with the affected divisions and review existing divisional security plans and create plans for divisions currently without plans and report back.
- ▶ Staff report to the Budget Committee on the comparator information and options utilized by other major cities, and that staff report on the framework and implementation as they relate to ABCs.
- ▶ That the framework for the City-wide Security Plan include advice on civilian oversight, independent complaints process, access and equity hiring and training, and environmental design measure.

<http://app.toronto.ca/tmmis/viewAgendaItemHistory.do?item=2008.EX18.1>

Item GM22.4, Meeting of Toronto City Council, April 29 and 30 2009

City Council, in considering recommendations contained in a March 27, 2009 report from the City Manager entitled, "City-wide Security Plan" directed, among other things:

- ▶ All agencies with dedicated security management including the Toronto Parking Authority apply the security framework and report to their respective Boards regarding their own security plans;
- ▶ The Corporate Security Unit coordinate the establishment of a Security Workgroup, comprised of representatives from Agencies, Boards and Commissions... for the purpose of guidance on effective implementation of the Corporate Security framework and the enhancement and effectiveness of City-wide security through information sharing;

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- ▶ Budgeting for each agency security plan be submitted to its applicable Board in future years' operating and capital budgets based on operational priorities.
<http://app.toronto.ca/tmmis/viewAgendaItemHistory.do?item=2009.GM22.4>

b) Toronto Parking Authority Board Direction

The Board of Directors of the Toronto Parking Authority, at its meeting of June 17, 2019, in considering the staff report titled, "Toronto Parking Authority - Status Update 2: Security Services Assessment and Transition", among other things, engaged the City of Toronto's Corporate Security Division for the purpose of assuming management and oversight responsibility of the Authority's security program and approved this "Toronto Parking Authority Security Policy and Plan".

c) Security Legislation

Employees, customers, and the public expect organizations to identify and anticipate areas of risk and set in place a cohesive strategy across all functional lines to mitigate or reduce those risks.

The TPA has a responsibility to provide and maintain safe and healthy working conditions by complying with all applicable policies, Acts, and Codes and that this compliance is documented and monitored to ensure applicable measures and actions are taken. The TPA also has a duty to protect its employees and members of the public from foreseeable dangers. Knowing the current and foreseeable threats may obligate the Authority with a duty to act and implement applicable counter-measures.

Some of the Acts/Codes where this duty is obvious, and subject to penalties when breached, include the:

- ▶ Occupational Health & Safety Act
- ▶ Criminal Code of Canada, Bill C-45
- ▶ Occupiers Liability Act

3. Toronto Corporate Security

a) Corporate Security Unit

The Corporate Security unit, under the Deputy City Manager of Corporate Services, is the corporate body responsible for setting security standards and partnering with City divisions and select agencies for the protection of City/Agency employees and assets. This is completed utilizing a mix of proactive and reactive security measures (services). The sharing of resources, knowledge, and expertise allows for security to be provided in a standardized and cost-effective manner.

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b) Mission Statement

“The Corporate Security Unit is committed to supporting and enhancing the safe delivery of City services. We do this by providing and maintaining an appropriate level of sustainable proactive and reactive security and life safety measures through highly qualified, knowledgeable, trained security professionals, contracted services and current technology.”

c) Services Provided

The majority of services provided by Corporate Security fall into seven major categories:

i. Audits and Assessments

- ▶ Provide detailed security risk assessments and building security condition assessments. Complete Crime Prevention through Environmental Design (CPTED) assessments.
- ▶ Develop physical protection system capital plans, system design, implementation, and training following physical security standards.
- ▶ Provide guidance, assistance and direction to employees and sub-contractors on facility construction and renovation projects.

ii. Security Systems

- ▶ Specify physical security measures according to standards, guidelines, and best practices.
- ▶ Implement physical security measures (locks, keys, barriers, alarm systems, access control systems, video surveillance, communication, lamination, lighting, etc.).
- ▶ Maintain and program City of Toronto access cards and card readers.
- ▶ Oversee security device preventative maintenance and repair.

iii. Staffing

Corporate Security provides a wide range of security staffing options through in-house and contracted services for City/Agency-owned, managed and leased properties.

These options include:

- ▶ Security Mobile Alarm Response.
- ▶ Security Mobile Patrol.
- ▶ Contract Security Guard management.
- ▶ In-house Corporate Security Officers (Security Guards).
- ▶ In-house Control Room Officers.
- ▶ Security program supervision.

iv. Security Control Centre Operations

The Corporate Security Control Centre is the hub of all Security operations for the City of Toronto. Staffed 24 hours a day, seven days a week, the Security Control Center provides a wide range of services, including:

- ▶ Monitoring access to City properties through various security systems and measures.
- ▶ Responding to and investigating alarms or abnormal usage.
- ▶ Monitoring video surveillance systems.
- ▶ Dispatching appropriate staff and mobile responses to emergencies and contacting the applicable emergency service.

v. Incident Response

To ensure security incidents are appropriately documented, investigated, tracked, and closed, Corporate Security completes:

- ▶ Incident reporting / recording.
- ▶ Investigations of security incidents or breaches.
- ▶ Recommendation and implementation of security measures.
- ▶ Follow-up and closure of incidents.

vi. Training

Corporate Security offers a number of security training programs including: Security Orientation, Crime Prevention, Theft and Robbery Prevention, Workplace Violence, Domestic Violence, Crisis Intervention, and Conflict Management.

vii. Other

Other services provided by Corporate Security include:

- ▶ Security Event Planning.
- ▶ Event Security.
- ▶ Emergency Plans.

The range of services provided to the TPA, including relevant levels, service standards and time frames are set out in related documents under the framework umbrella of this Security Policy and Plan, including but not limited to the Service Level Agreement, detailed operational, site-specific and various procedure documents.

d) Toronto Parking Authority Security Framework

This framework involves mandating that the Corporate Security Unit, is the corporate body responsible for setting security standards and protecting assets for the Toronto Parking Authority, subject to the approval of TPA.

Under this framework, the centralization of the security function allows existing and future security resources to be effectively coordinated, shared and responsive towards those areas in demonstrated need according to threats or risk, thus augmenting the overall level of security.

Corporate Security partners with the Toronto Parking Authority to provide and enhance the safety and security of TPA employees, customers and assets.

This framework serves as the basis for the Toronto Parking Authority Security Policy and Plan as it relates to:

- ▶ the requirement for security plans;
- ▶ the methodology for the development of security plans;
- ▶ the requirements for specific security policies; and,
- ▶ the requirement for specific statements on civilian oversight, independent complaints process, access and equity hiring and training, and environmental design measures.

4. Toronto Parking Authority Physical Security Plan

a) Purpose

The Toronto Parking Authority Physical Security Plan is a joint document created and updated by Corporate Security and the Toronto Parking Authority.

The plan is intended to be a fluid document that has its priorities reviewed and updated at least annually based on changes in threats, security occurrences, security measures implemented in the previous year, and new legislative or policy requirements.

The plan is to be referenced to guide future year TPA operating and capital requests based on operational priorities and within approved budget levels. The TPA and Corporate Security will work collaboratively pursuant to the Service Level Agreement throughout the implementation of their plan, through engaging in applicable meetings and other required structures or processes.

b) Methodologyi. *Data Gathering*

Required data gathering and analysis is completed by:

- ▶ Working with key contacts of the TPA and Corporate Security to obtain background on operating and physical security including statistics of incidents, obvious deficiencies, roadblocks to further enhancements, and special requirements of certain classifications of facilities or areas in their operations.
- ▶ Obtaining relevant statistics through security incident reports, National Crime Index ratings and Police incident statistics to help determine the level of threats for different areas.

ii. *Identification and Prioritization of Threats*

Identification/prioritization of various threats/risks posed and the evaluation of the current measures in place to counteract these threats (a threat assessment). A security threat assessment of a facility shall follow a recognized documented risk assessment methodology such as the "General Security Risk Assessment Guideline" from ASIS International.

iii. *Security Building Condition Assessments*

Completing the first stage of a Security Building Condition Assessment (Security BCA). A Security BCA is similar to a regular state of good repair building condition assessment; however, its sole focus is on security, an area not covered by on-going state of good repair BCA's. A key factor in the Security BCA is determining the security counter-measures that should be used. The "Corporate Security Assessment Methodology for Building Classification" provides this roadmap and will be used to help document the physical and operating security measures currently in place at the facility, provide the baseline standard for the facility type, and thereby highlight any areas currently below the standard.

iv. *Standards Development*

Required standards development is completed by:

- ▶ Devising applicable security standards, practices, policies, counter-measures, and capital plans to enable TPA to mitigate the risks which those threats present.

Based on the above inputs, a Toronto Parking Authority Physical Security Plan:

- ▶ Documents the current security features in place for each TPA facility;
- ▶ Completes a threat assessment by analyzing statistics, reports and operating risks;
- ▶ Determines the security features required to address the risks highlighted in the Threat Assessment, with consideration given to industry standards and benchmarks;
- ▶ Highlights any gaps between the current security features and the recommended security features;
- ▶ Presents a multi-year operating and capital plan to achieve the recommended security features in a suggested priority sequence; and,
- ▶ Provides a multi-year operating and capital plan to maintain the recommended security features.

c) Physical Security Design

The level of physical and operational security is established on a case by case basis depending on a number of factors such as the results of a threat assessment, internal security best practices, external standards and benchmarking, City and TPA policy, stakeholder input, and cost-effectiveness.

A key security design principle is to provide a balance of accessibility and asset security. The security requirements will vary depending upon facility type as each type faces varying threats and may require unique safeguards to provide adequate security against those identified threats. In the case of TPA facilities, it is recognized, by the nature of their purpose, service provided and designed use, that they generally require broad public access, and in many cases are not directly monitored.

i. *Security Considerations*

The complexity of security risks creates a diverse matrix of interrelated threats, vulnerabilities, and impacts.

ii. *Root Causes*

Examination should be completed into what possible root causes exist for any current threats or security breaches. Consideration needs to be given to both internal and external threat factors and changes that could have a material effect on site security. Areas that should be examined include surrounding neighborhood or facility changes, staff or resource reallocations or reduction, changes to site operating hours, etc.

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iii. *Impact on the Neighbourhood*

Once a range of security measures is proposed, consideration needs to be given to their possible effect on site security and the neighborhood. There are security measures that can either have positive or negative effects based on their design, type, and placement such as surveillance cameras, fencing, planters, barriers, parking control, window protection, procedures, and staffing. The ultimate goal of planned security measures is to increase overall site security while receiving staff and customer buy-in, acceptance, and usage.

iv. *Address Key Problems*

Once a security measure is proposed, a review should be completed to ensure that the measure proposed will properly address the threat. This not only impacts the type of security measure but also the placement. This review must take into account privacy, accessibility, initial cost, required maintenance, longevity, aesthetics, interoperability, and integration.

v. *Early Detection*

An important principle of detection, delay and response, in the case of risk to property or restricted areas (customers' vehicles, booths or other rooms, etc.) is to detect an intruder as early as possible, delay the intruder as long as possible through physical measures, and respond as quickly as possible. The ultimate goal is to extend the time between detection and an intruder reaching an asset so responders (Security, Police, etc.) can intervene and apprehend.

vi. *System Integration*

Security measures shall be integrated where possible to enhance deterrence, detection, delay, and response.

vii. *Interoperability*

An important consideration in the design and specification of equipment shall be whether the new equipment will easily integrate with existing site security equipment in order to allow interoperability to occur. Considerations relate to make and model of equipment, availability of parts, ease of repair, and preventative maintenance.

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viii. *Layered Protection*

Consideration must be given to layering security measures to act as a back-up to, or a complement to, existing equipment in order to enhance deterrence, detection, delay, and response.

ix. *Emerging Technology*

A key consideration for security measures is ensuring the measure chosen is current and can be easily upgraded. It is important when choosing security technology that the company manufacturing the product be committed to the on-going and future support and development of the technology. As new technology is constantly emerging it is important that this technology is tested and evaluated in real operating conditions at TPA property before a commitment is made to wide usage.

x. *Security Levels and Access Zones*

Facility security should be designed in order to move between at least two *levels* of security: "normal" and "elevated". Normal levels are moved to the elevated state by securing key areas, staffing, and procedures where the overall threat risk level for the facility is raised based on threat information, unexpected exposures, or actual incidents.

Facility security should also be designed to generally encompass at least three access control *zones* to limit access to critical areas. These zones are completed through access control, barriers, and/or signage.

Public Zone: Free access to the general public.

Restricted Zone: Limited to employees and authorized persons.

Security Zone: Limited to specified employees or persons who have a need for access.

The mechanisms and procedures for restricting access to the various zones shall be commensurate with the level of risk associated for each zone.

xi. Common Design Measures

- Exterior and Interior Signs

Facilities shall display signs that give clear delineation between public and employee only space. Some types of signs are required by City Policy (Security Video Surveillance Policy), City By-Laws, and in order to effectively enforce Acts or Codes (such as the *Trespass to Property Act*).

- Stairwells and Elevators

Stairwells and elevators should not provide direct, unrestricted access to restricted zones or Security zones. Where possible, passenger and freight elevators (including those from parking and loading dock areas) should open into a public zone.

Where applicable, access to work spaces from elevator lobbies shall be controlled in respect of employees, contractors, visitors and service personnel. Safeguards vary, depending on the nature of program, assets, the size of the work space, and the number of people requiring access to a floor.

Additional security measures may include a physical barrier (such as a wall), an arrangement using personnel, or a reception function.

- Pedestrian Entrances and Entrance Lobbies

Public entrances to facilities, as a primary consideration must facilitate ease and convenience of customer access, but must also take into account means to channel traffic through selected entry and exit points in order to effectively address security concerns.

- Service and Utility Entry and Exit Points

Service and utility entrance and exit points (such as air intakes, mechanical ducts, roof hatches and water supplies) should be safeguarded to ensure that the facility's critical assets and life safety measures are not compromised by unauthorized or uncontrolled access.

- Shipping and Receiving Areas, Loading Docks and Mail Rooms

Applicable largely in TPA joint venture facilities where shared use (residential, commercial) occurs, where possible, shipping and receiving areas, loading docks and mail rooms should not be directly linked or adjacent to restricted-access areas or critical facility infrastructure.

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d) Security System Procurement and Replacement

Where the Toronto Parking Authority agrees or requires that a security or alarm system for a facility or area be procured, installed, moved, altered or replaced, Corporate Security shall be consulted. Before any system is designed or procured, a Threat Assessment should be completed to ensure the appropriate security counter-measure is in fact being recommended. Corporate Security will also ensure that applicable security standards, guidelines, and best practices are followed in regards to the threat assessment and system specification, design, integration, installation, and programming. Where access control or alarm systems are required, the Toronto Parking Authority standard system will be used across all facilities. Decisions to implement, including approval of associated cost, remain within the sole purview of the TPA

e) Review and Update of Physical Security Plan

The Toronto Parking Authority Physical Security Plan will be reviewed by Corporate Security before year-end each year. Physical Security Plan updates will be provided to the Toronto Parking Authority to enable planning and preparation of budget requirements.

5. Roles and Responsibilities

a) Toronto Parking Authority/Corporate Security Reporting Structure

In accordance with the provisions of the Service Level Agreement, Corporate Security will assign and maintain a primary security lead to TPA who will be the point of contact and coordinate all security activities on behalf of TPA. Likewise, TPA will identify and advise Corporate Security of its lead(s) with respect to security matters.

b) Toronto Parking Authority Management Staff Responsibilities

Management of Toronto Parking Authority shall:

- ▶ understand and uphold the principles of this Policy and Plan;
- ▶ ensure that all staff are familiar with their roles and responsibilities in the event of a security incident;
- ▶ ensure all employees are aware of how and when to contact Corporate Security and/or the contracted security provider; ensure all employees are aware of site security measures and their applicable usage;
- ▶ ensure all security related incidents are reported promptly to Corporate Security;
- ▶ ensure all potential threats to employee and customer safety and security are reported promptly to Corporate Security;
- ▶ identify critical assets and threats within their portfolio;

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- ▶ take all reasonable and practical measures to protect assets, with the assistance of Corporate Security; and
- ▶ identify and communicate security training needs to Corporate Security.

c) Corporate Security Responsibilities

Corporate Security shall, pursuant to the terms and conditions of the Service Level Agreement:

- ▶ provide a governance role to ensure adherence and compliance with the Toronto Parking Authority Security Policy and Plan, applicable security regulations, policies, procedures and legislation;
- ▶ manage the Toronto Parking Authority Security Program and act as a corporate focal point for all program security requirements;
- ▶ ensure the Toronto Parking Authority Security Policy and Plan is updated on an ongoing basis to maintain relevance and currency;
- ▶ provide security to Toronto Parking Authority owned and managed properties through various security systems, contracted Security Guards, and various in-house and contract firms/services;
- ▶ partner with Toronto Parking Authority staff in developing and maintaining their sites' security;
- ▶ support the Toronto Parking Authority in the furtherance of its goals by providing required security support to programs and projects;
- ▶ maintain an ongoing awareness of security standards, best practices, legislative and regulatory requirements, and developments in the security industry and update City/TPA standards accordingly;
- ▶ develop and enhance program-specific standards, requirements, protocols, policies, and procedures to properly provide and enhance security for assets, employees, customers and property;
- ▶ conduct security audits and assessments reviewing TPA, facility or process security measures through assigned specialized personnel;
- ▶ manage capital security projects as may be requested by TPA through assigned, specialized personnel and contractors; identify, test and implement tools, programs, and technologies to provide cost-effective solutions in order to meet identified critical and long term security needs;
- ▶ conduct and manage required security investigations and act as a liaison with law enforcement personnel;
- ▶ collect and maintain records of losses, threats and security breaches and investigate and report on these as required; and,
- ▶ provide recommendations to the Director, Corporate Security and the Toronto Parking Authority management contact for update of the Toronto Parking Authority Security Policy and Plan.

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d) Contract Guard Responsibilities

Contracted Security Guards working on TPA owned or managed properties shall:

- ▶ comply with all applicable regulations contained in the “Private Security And Investigative Services Act, 2007”;
- ▶ comply with all expectations outlined in the service contract or bid award between the TPA and the contracted guard company and issued post orders, policies, and procedures; comply with applicable TPA and City policies which reference obligations of contractors;
- ▶ maintain the utmost professionalism, customer service, and confidentiality when dealing with employees and customers; and,
- ▶ complete incident reports and distribute to pre-designated Corporate Security staff.

e) Contract Service Provider Responsibilities

Contractors and Service Providers working on TPA owned and managed properties shall:

- ▶ comply with applicable City and Toronto Parking Authority policies which reference obligations of contractors;
- ▶ comply with all contract provisions and contractor obligations and,
- ▶ comply with site specific security policies and procedures, including, but not limited to, access procedures, wearing issued identification, not taking facility keys or cards off the site, etc.

f) All Toronto Parking Authority Employee Responsibilities

All TPA employees are responsible for following this TPA Security Policy and Plan and other security policies and procedures in the execution of their duties. All TPA staff shall:

- ▶ maintain a safe work environment and work safely with consideration to security;
- ▶ remain aware of their role as a safety and security partner by ensuring all potential threats to employee and customer safety and security are reported promptly to their Supervisor, Corporate Security, the contract security vendor or Police in accordance with applicable procedure;
- ▶ ensure all security related incidents are reported promptly in accordance with applicable procedure; and,
- ▶ not tamper with or bypass any security measure.

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6. Security Policies and Procedures

The policies and procedures contained in this section largely fall within the mandate of the Corporate Security Unit pursuant to the Service Level Agreement, and thus the Unit shall be the primary contact and administrator. These policies and procedures may be frequently updated based on upon operational need, new standards, or changes in TPA or City policy.

a) Security Threat and Risk Assessments

A wide array of issues should be analyzed before security measures are implemented, ensuring an appropriate distribution of resources, while not creating new exposures in the process. Through the Threat and Risk Assessment process, a range of threats, risks, and vulnerabilities are identified and categorized on the basis of criticality. These are organized so that security measures are applied in a complementary and supportive manner to improve security based on risk priority.

b) Threat Assessments

Each Threat Assessment should follow a standard Threat and Risk Assessment template and procedure that encompasses at least the following four phases: asset definition; threat assessment; vulnerabilities analysis; and selection of security measures. The overall objective is to define security requirements and to organize those requirements in a prioritized ranking.

c) Risk Assessments

An industry recognized ASIS General Security Risk Assessment Guideline risk assessment methodology shall be followed.

d) Providing Recommendations to the Toronto Parking Authority

Recommendations for security measures shall be provided after an applicable threat and risk assessment. These security measures will vary depending on the building type, acceptable levels of risk, threat assessment results, cost-effectiveness, and standards.

7. Security Awareness Training

The Corporate Security lead for the Toronto Parking Authority Program shall develop, in consultation with appropriate TPA HR staff, an employee security awareness training program for all Toronto Parking Authority staff. The security awareness training shall be delivered through print media (signs, brochures), online videos to be accessed by Toronto Parking Authority employees through a secure website, as well as in-class training sessions.

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8. Security Staffing and Assignments**a) Security Staffing**

Under the Private Security and Investigative Services Act, 2007, persons or staff that provide security must be licensed as a security guard.

Where security staffing requirements exist for the Toronto Parking Authority, the provision of these services must be provided through Corporate Security via the use of its internal security resources or a contracted service, the determination of such to be based upon factors such as the result of a security assessment, common past practice, history of risk exposure, and unforeseen emergent events (e.g. elevated level of security).

Corporate Security, with the assistance of the Toronto Parking Authority, shall prepare Standing Post Orders that fully describe the duties and reporting requirements for each security staffing position allocation.

b) Contract Guard Requirements

All contract security guards assigned to the Toronto Parking Authority contract must meet the minimum standard of experience and training outlined in the Toronto Parking Authority security service contract. All contract security guards and supervisors are required to be in full uniform and, when required, driving a clearly marked security vehicle. Contract security coverage, including shift organization, hours, start and end times, location deployment, etc., is to be determined and authorized by TPA upon recommendation of Corporate Security, with regard to aforementioned risk and threat factors, operational needs and budget.

Security coverage is subject to change in order to address immediate security needs. All changes to the security guard requirements are presented to the Toronto Parking Authority for review and approval.

c) Standard Operating Procedure Outline - Static and Mobile Patrol**i. *Booking On and Off Duty***

For accountability reasons, all Security Personnel are required sign in and sign out at the beginning and end of their scheduled shifts via the Service Provider's automated system. Guards are not permitted leave until they have been relieved from duty. The guard is required to conduct a Health & Safety check hourly via the vendor's automated system.

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ii. Uniform and Equipment

The TPA requirement in accordance with the Security Guard Service Contract is that all security personal assigned to this detail by the Security Service Provider will be deployed in full compliant uniform (PSISA, 2005) that includes Body Armor, Duty belt, Handcuffs and Baton and CSA approved safety footwear.

iii. General Duties

Each guard assigned to a static post must sign in to the Service Provider's Management system. Each guard is required to verify that all of their equipment is in good and working condition. The guard must ensure that the equipment and site cell phone are in their possession at all times. The general duties and responsibilities of the static security guard and the mobile patrol security guard vary from site to site. It is the role of all security guards assigned to the Toronto Parking Authority to protect people, property and information. While there may be some situations which will involve physical intervention, the majority of tasks assigned require the security guard assigned to the TPA facility to **observe, deter, record and report**.

General duties of TPA static security guards and mobile patrol guards include but are not limited to:

- ▶ Ensuring premises and property are protected in an appropriate and effective fashion against a variety of natural and man-made threats.
- ▶ Preventing, detecting and reacting appropriately to the commission of criminal and unwanted actions on or against the property of the TPA.
- ▶ Interacting with law enforcement officials, where necessary, such as apprehending and detaining someone who has committed a criminal offence. Security may be able to supplement the efforts of police by securing crime scenes until the police can arrive.
- ▶ Providing leadership and direction in emergencies and assisting emergency personnel in times of crisis, e.g. directing fire fighters to the easiest/best way to get to the scene of the fire.
- ▶ Controlling access to a site, including monitoring entrance and gate passage, escorting people and valuables.
- ▶ Conducting crowd control duties.
- ▶ Preventing work accidents by being aware of potential dangers, reporting safety hazards and following directions to minimize the risk posed to others.
- ▶ Interacting with and being visible to TPA on-site staff.

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iv. *Patrolling – Static Sites*

The guard(s) assigned to a TPA static site are required to conduct full patrols of the facility at a frequency specified by TPA on recommendation of Corporate Security. A patrol consists of each floor of the facility, stairwells, lobbies, common areas, and ensuring all offices and mechanicals doors are locked and secured. All findings should be recorded on a patrol log. The security guard is required to scan each patrol checkpoint during the facility patrol in order to record the time they were at each location in the facility. When not actively patrolling, the security guard is required to be in a visible location, for example, near to the vehicle entrance and exit gate or the parking attendant booth.

v. *Patrolling – Mobile*

At any given time there are to be mobile security guards patrolling Toronto Parking Authority facilities and surface parking lots. Frequency, number of units deployed and team size are specified by TPA on recommendation of Corporate Security.

vi. *Supervisor(s)*

Supervisor(s) assigned to the Toronto Parking Authority will be available at all times to provide support to static and mobile guard teams. Supervisor(s) must respond to dispatch calls and approve all security reports submitted by the TPA assigned guards.

vii. *Patrol Check Points*

All Toronto Parking Authority garages and surface lots have guard tour checkpoints installed. All mobile security guards are required to document their patrols by scanning every patrol checkpoint located at the TPA facility.

viii. *Access Control*

TPA security guards may be required to observe and record who enters and exits a site. A completed note book entry or automated activity log report is required if the security guard provides access to people outside the normal usage of the parking facility (i.e. electrical rooms). The security guard is to record the individual's name and time of entrance to, and exit from the area. The information obtained will permit guards to locate visitors, either while on the property in the event of an emergency, or at a later time after they have left.

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d) Daily Security Management

i. *Communication*

The contract security Supervisors shall share information with the Corporate Security lead for the TPA Security Program. All relevant communication from the contract security Supervisors will be forwarded to the Toronto Parking Authority designated contact.

ii. *Incident Report Review*

The Corporate Security lead will review all security incident reports within twelve hours of the report being written. All incident reports are reviewed for quality and content. Any incident report not meeting Corporate Security's expectation is returned to the Contract Security Supervisor, requesting correction. All incident report correction requests are logged in the Corporate Security Contract Management Issues Log for tracking purposes. Specific incident reports such as vehicle break; property damage, and maintenance issues are shared with the Toronto Parking Authority designated contact at the earliest opportunity.

iii. *Guard Tour Patrol Records*

The Corporate Security lead reviews, on a daily basis, the previous security shift(s) patrol record through accessing the guard tour application and tracking each vehicle's GPS coordinates throughout the shift as well as the scanned patrol checkpoints. Any issues found during the daily guard tour patrol review are sent to the Contract Security Manager and recorded in the Corporate Security Contract Management Issues Log.

e) Contract Management

i. *Contracted Security Service Request for Proposal (RFP) Process*

Corporate Security will be responsible for producing all contract security service request for proposals in conjunction with TPA staff. All security RFP's will adhere to the City of Toronto Corporate Security standards and Toronto Parking Authority requirements, ensuring the RFP has a clear scope of work, key performance indicators and patrol metrics, staffing plans, staff retention plans, process for vetting security guards assigned to the Toronto Parking Authority contract, clearly defined security guard experience and qualification requirements, clearly defined management and management support structure.

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ii. *Key Performance Indicator Development*

Corporate Security will develop key performance indicators which will be inserted into all new contract security RFPs. One key performance indicator now in place is the elapsed time to attend a call for security after being contacted by any Toronto Parking Authority employee. This performance indicator, if not met, will result in a penalty to the vendor.

iii. *Performance Metric Development*

Corporate Security will be responsible for developing performance metrics and holding the vendor accountable to each metric.

iv. *Vendor of Record Meetings*

Corporate Security will hold a security contract meeting each month to review the contract deliverables. Corporate Security will minute each meeting and provide the minutes to the Toronto Parking Authority. The Toronto Parking Authority staff will attend monthly vendor meetings as necessary.

v. *Contract Issues Management*

All contract issues will be dealt in accordance with the following escalation protocol:

- ▶ An issue is identified by Corporate Security or the TPA.
- ▶ The vendor receives from Corporate Security a formal letter outlining the problem and time lines for an expected resolution.
- ▶ Corporate Security requests a meeting with management from the vendor. Meeting minutes and action items are recorded and shared with the Toronto Parking Authority.
- ▶ If the issue remains unresolved, the Director, Corporate Security and the designated Toronto Parking Authority Senior Management staff meet with the vendor's senior management.
- ▶ If the issue remains unresolved, Corporate Security and the Toronto Parking Authority engage the Toronto Parking Authority Purchasing and City Legal Services.

vi. *Invoice Review and Payment*

Corporate Security is responsible for receiving and vetting all contract security invoices, approving or disputing invoices and sending approved invoices to the Toronto Parking Authority for payment.

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f) Security Reportingi. *Incident Reporting*

Contract security service provider uses an online reporting system in which front line security guards are able to write security incident reports via a hand-held device. These reports are then reviewed by the on-duty contract security supervisor, before being approved as a complete report. Once a report has been completed and approved by the contract security supervisor, Corporate Security receives notification with a copy of the incident report.

The following are a list of incidents that are typically reported by front line security guards:

- ▶ Patrol of the garage
- ▶ Public found loitering on the property
- ▶ Public found consuming drugs/alcohol on the property
- ▶ Enforcing Trespass to Property Act
- ▶ Damage in relation to the property
- ▶ Maintenance required (e.g. excess garbage in the garage)
- ▶ Emergency Services attended (Toronto Paramedic Service/Toronto Fire)
- ▶ Toronto Police assistance
- ▶ TPA staff requiring security assistance
- ▶ Suspicious individuals in the garage
- ▶ Vehicle break-in
- ▶ Damaged to vehicles
- ▶ Stolen/abandoned vehicles

ii. *Corporate Security Incident Reports Roles and Responsibilities*

Corporate Security is responsible for reviewing all incident reports, ensuring they meet the Corporate Security standard. Any issues found in the security incident reports by Corporate Security are identified, and reported to the contract security supervisor and contract manager for follow-up.

Corporate Security shares all high priority security incident reports which are deemed to be more of a serious nature with the Toronto Parking Authority contact.

The high priority reports may be required, but not limited to the following circumstances:

- ▶ Incidents involving use of force
- ▶ Arrest

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- ▶ Injuries to staff, security, or public
- ▶ Significant damage to property/Maintenance issues
- ▶ Incidents involving emergency services
- ▶ Vehicle break-in

iii. *Toronto Parking Authority Online Incident Reporting*

It is the intent of TPA that it work together with Corporate Security to develop the necessary infrastructure and procedures to enable TPA access for the purpose of submitting online security incident reports utilizing the Corporate Security system.

iv. *Toronto Parking Authority Telephone Incident Reporting*

Toronto Parking Authority staff shall immediately report all suspicious, criminal or unwanted activity by telephone to the emergency contact number(s) provided, in accordance with TPA policy and training instruction, and request an immediate response from security staff.

v. *Quarterly and Yearly Reporting*

Corporate Security will provide quarterly and yearly reports to the Toronto Parking Authority for review. Each quarterly report will be sent no later than thirty days after the end of each quarter. The yearly report will be sent no later than sixty days after the end of each year.

Required content of the quarterly and yearly statistical reports will be determined by the TPA and Corporate Security, and at a minimum, consist of:

- ▶ The numbers of security patrols conducted at each Toronto Parking Authority owned or managed location.
- ▶ The number of calls for security assistance and the average time to respond to each TPA facility.
- ▶ Security incident statistics broken down by type; month; day; time; and location along with an analysis explaining trends in activity and providing recommendations to adjust security coverage or focus.

g) Incident Communication

i. *TPA Security Incident Response Protocol*

The Toronto Parking Authority Security Incident Response Protocol defines the actions security guards and Corporate Security management staff are required to take throughout the course of an incident.

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ii. TPA Security Incident Escalation Protocol

The Toronto Parking Authority Security Incident Escalation Protocol is used by all security staff and defines the actions which must be taken during a regular occurrence and an exceptional incident.

9. Related Policies and Legislation**a) Video Surveillance Policy**

TPA Policy Resolution 7-2, *CCTV Video Monitoring & Disclosure*, is the governing policy with respect to video surveillance. The Toronto Parking Authority recognizes the need to balance an individual's right to privacy and the need to ensure the safety and security of its employees, customers, visitors and property. While video surveillance cameras are generally installed at TPA facilities for customer service support, it is recognized that proper video surveillance, where deemed necessary, is one of the most effective means of helping to keep TPA facilities and properties operating in a safe, secure, and privacy protective manner.

Camera or related systems to be acquired or deployed for security purposes may not be procured, installed, moved, altered, replaced, or erected without prior consultation with Corporate Security and will be done so only in accordance with the Policy.

b) Workplace Violence Policy

TPA Policy Resolution 4-22, *Workplace Violence and Harassment Policy*, establishes the Authority's commitment to the prevention of harassment and violence and promotes a harassment/violence-free workplace in which all people respect one another and work together to achieve common goals. The Authority is committed to working with its employees to provide a safe work environment. The Toronto Parking Authority will not tolerate any acts of harassment/violence and will take all reasonable and practical measures to prevent harassment/violence and protect employees and customers.

c) Graffiti By-Law

Graffiti poses a number of problems including:

- ▶ posing a risk to the health, safety and welfare of a community;
- ▶ promoting a perception in the community that laws protecting public and private property can be disregarded with impunity;
- ▶ fostering a sense of disrespect for private property that may result in increasing crime, community degradation and urban blight; and,
- ▶ creating a nuisance that can adversely affect property values, business opportunities and the enjoyment of community life.

City Council enacted a "Graffiti Bylaw" (Municipal Code, Chapter 485) to guide staff in preventing and enforcing the removal of graffiti effectively and immediately. Graffiti is defined in the "Graffiti Bylaw" as: "One or more letters, symbols, figures, etching, scratches, inscriptions, stains, or other markings that disfigure or deface a structure or thing, howsoever made or otherwise affixed on the structure or thing, but, for greater certainty, does not include an art mural".

TPA staff must remove graffiti on TPA facilities and equipment, with special emphasis on hate or gang-related graffiti, to be removed within a 24-hour period, and all other graffiti targeted for removal within a 72-hour period to prevent further proliferation. Corporate Security is to be notified of any hate or gang-related graffiti on Facilities and equipment to ensure the graffiti is appropriately documented and the Police are notified.

d) Applicable Legislation Affecting Security

i. *Criminal Code of Canada*

There are a number of sections of the "Criminal Code of Canada" that affect Security personnel. Listed below are some relevant sections regarding the authority to arrest persons in certain circumstances, as well as, the authority to remove a trespasser.

Section 494 (1) Arrest Without Warrant By Any Person

Section 494(2) Arrest By Owner

Section 41 (1) Defence of house or real property

Section 41 (2) Assault by trespasser

i. *Trespass to Property Act*

A key purpose of this Act (Revised Statutes Of Ontario, 1990, Chapter T.21) is to allow an occupier (owner) or a person authorized by the occupier of property (Security Officer) to control who has access to their property and what behaviour or activities are allowed. The Trespass to Property Act is an important act for Security personnel as it allows for persons to be directed to leave the property, to be arrested for failing to leave the property, and to ban individuals from entering the property in the future.

Trespass An Offence -Sec. 2(1)

Arrest Without Warrant On Premises -Sec. 9(1)

Delivery To Police Officer -Sec. 9(2) 25

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10. Security Compliments and Complaints Process

TPA acknowledges that there are several avenues for customers or members of the public to submit a compliment or complaint relating to the security service.

a) Internal or External Compliments and Complaints

Internal or external compliments and complaints made about any security issue in general can be addressed to:

Director, Corporate Security
Corporate Security, City of Toronto
Metro Hall
55 John St., 7th Floor
Toronto, ON M5V 3C6

b) Security Guard Formal Complaint Process

Two avenues exist for making a formal complaint about any Security Guard.

i. *Option 1: Filing a Complaint with the Director, Corporate Security, City of Toronto*

Any member of the public or City of Toronto employee can file a written complaint with the Director, Corporate Security which will be promptly and properly investigated.

ii. *Option 2: Filing a Complaint with the Private Security and Investigative Services Branch*

Ministry of Community Safety and Correctional Services. Under the Private Security and Investigative Services Act, 2007, a member of the public may file a formal complaint about the conduct of a security guard, private investigator or a licensed security business.

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