

## **Toronto Fire Services Service Level Enhancements regarding Assessing Fire Safety and Fire Code Compliance**

**Date:** September 7, 2021  
**To:** Economic & Community Development Committee  
**From:** Acting Fire Chief & General Manager-Emergency Management, Toronto Fire Services  
**Wards:** All

### **SUMMARY**

---

This report responds to City Council direction related to the Auditor General's 2018 report "Raising the Alarm: Fraud Investigation of a Vendor Providing Life Safety Inspection Services to the City of Toronto." In response to this report, the Audit Committee, at its meeting on July 13, 2018, requested Toronto Fire Services outline operational and financial implications for options related to the assessment of fire safety and compliance with the Ontario Fire Code in buildings within Toronto. Toronto Fire Services (TFS) provided three options designed to enhance annual inspection services. At its meeting on July 23, 2018, City Council endorsed Option 1 which included the assignment of 11 Full Time Employees (FTEs) to the TFS Fire Safety Quality Assurance (QA) section effective September 1, 2018. City Council further requested the Fire Chief and General Manager, Toronto Fire Services to report back to City Council with respect to outcomes and analysis of the enhanced service levels.

With the addition of 11 FTEs assigned to the TFS Fire Safety QA section, TFS estimated the completion of 80 QA Inspection Review Audits in the fourth quarter of 2018 and 325 QA Inspection Reviews annually thereafter. QA Inspection Review Audits involve a systematic and comprehensive review of all aspects of Ontario Fire Code compliance for a given building, including the associated processes completed by third-party contractors. After reviewing the data since the program's introduction, TFS believes that the 11 FTE allocated are sufficient to complete the identified 325 annual inspection audits and that this sample size is adequate to provide TFS with an understanding of the compliance environment.

TFS continues to work with industry stakeholders to educate property owners on the requirements of the Ontario Fire Code (OFC) including the need for detailed records management and the importance of retaining a qualified contractors to carry out the work. Since TFS launched this process in 2018 there has been an increased awareness by the fire protection industry that these reviews will continue to occur in Toronto.

## RECOMMENDATIONS

---

The Acting Fire Chief and General Manager-Emergency Management, Toronto Fire Services recommends that City Council:

1. Receive this report for information.

## FINANCIAL IMPACT

---

There are no financial impacts associated with the recommendation in this report.

The Chief Financial Officer and Treasurer has reviewed this report and agrees with the financial impact information.

## DECISION HISTORY

---

At its meeting of September 30, 2020, City Council requested the Fire Chief and General Manager, Toronto Fire Services report back to City Council in advance of the commencement of the 2022 Budget Process with recommendations for further Inspection and/or Quality Assurance (QA) Inspection Review Audit service level enhancements.

<http://app.toronto.ca/tmmis/viewAgendaItemHistory.do?item=2020.EC15.5>

At its meeting of October 29, 2019, City Council requested the Fire Chief and General Manager, Toronto Fire Services report back to City Council in advance of the commencement of the 2021 Budget Process with recommendations for further Inspection and/or Quality Assurance (QA) Inspection Review Audit service level enhancements.

<http://app.toronto.ca/tmmis/viewAgendaItemHistory.do?item=2019.EC8.13>

At its meeting of July 23, 2018, in considering AU13.11 "Raising the Alarm: Fraud Investigation of a Vendor Providing Life Safety Inspection Services to the City of Toronto", City Council directed Toronto Fire Services to report back to City Council in advance of the 2020 budget process with respect to the analysis arising from the enhanced service levels and to provide recommendations for further Inspection and/or Quality Assurance service level enhancements. City Council also amended the 2018 Toronto Fire Services Operating Budget by \$392,863 to assign additional resources concerning the TFS Fire Safety Quality Assurance Section to enable the addition of 11 FTEs effective September 1, 2018 and to submit the annualized impact of \$1,135,528 related to 11 FTE with the 2019 TFS budget submissions.

<http://app.toronto.ca/tmmis/viewAgendaItemHistory.do?item=2018.AU13.11>

## COMMENTS

---

In response to the 2018 Auditor General's Report, "Raising the Alarm: Fraud Investigation of a Vendor Providing Life Safety Inspection Services to the City of Toronto" (Raising the Alarm Report), Toronto Fire Services (TFS) was requested to

outline operational and financial implications for options related to the assessment of fire safety and compliance with the Ontario Fire Code in buildings within Toronto. TFS provided three options designed to enhance annual inspection services. At its meeting on July 23, 2018, City Council endorsed Option 1 which included the assignment of 11 Full Time Employees (FTEs) to the TFS Fire Safety Quality Assurance (QA) section effective September 1, 2018. With the addition of 11 FTEs assigned to the TFS Fire Safety QA section, TFS estimated enhanced service levels that included the completion of 325 QA Inspection Review Audits annually.

### **TFS Quality Assurance Inspection Review Process**

The QA Inspection Review Audits involve a systematic and comprehensive review of all aspects of Ontario Fire Code compliance for a given building, including the associated processes completed by third-party contractors. TFS selects buildings to audit using two processes, random selection and referrals from staff. As investigations into the associated processes unfold and issues are identified this adds to the complexity of the individual audit reviews. As a result, a significant amount of QA Inspection Review Audit capacity is expended in conducting the comprehensive and complicated follow-up activities required to address the identified issues. These follow-up activities include technical document review, research, site visits for information gathering, and report preparation in addition to the standard re-inspections required to ensure compliance. For a large complex building, there could be upwards of 2,000 pages to review.

### **Inspection results**

The inspection review audits completed since the program began are shown in Table 1. TFS completed 86 QA Inspection Review Audits in the fourth quarter of 2018, meeting the target it had identified. In 2019 a total of 165 QA Inspection Review Audits were completed. TFS encountered a large volume of follow-up investigative work as a result of the Raising the Alarm Report in the form of follow-up activities that were required to complete the inspection review audits that emerged from the report. This follow-up activity resulted in unanticipated workloads impacting TFS' total number of originally estimated QA Inspection Review Audits completed for 2019.

Table 1: QA Inspection Review Audits completed 2018-2021 Year-to-Date.

	2018 (4th Quarter)	2019	2020	2021 YTD (August 15 2021)
QA Inspection Review Audits completed	88	165	289	196

In 2020, TFS completed 289 QA Inspection Review Audits. The onset of the pandemic in the first quarter of 2020 affected approximately eight (8) weeks of productivity for the unit, however TFS has reviewed the month by month data for the remainder of 2020 and the data to date for 2021 and is confident the projected review rate of 325 enhanced inspections per year is achievable and no additional staffing above current complement is required to complete this work. The number of inspections that TFS

identified for this work, (325), is also sufficient for the purposes of Quality Assurance as it represents a random sampling of the inspection work conducted by TFS.

## **Impact of increased Quality Assurance**

This comprehensive work TFS is undertaking has resulted in enhanced levels of accountability in the third-party fire protection industry, which is currently unregulated in Ontario. There has been an increased awareness by the fire protection industry that these reviews are, and will continue to occur in the City of Toronto.

TFS has also taken a proactive approach by educating property owners on the requirement of the Ontario Fire Code (OFC) and the need for detailed records management and the importance of retaining qualified contractors to carry out the work. Additionally TFS has participated in continuing education workshops with industry stakeholders highlighting the responsibilities of technicians in fulfilling the inspection, test, and maintenance requirements of the OFC. TFS continues to work with stakeholders throughout the industry and in 2021 coordinated a stakeholder advisory team and put together recommended OFC enhancements that were presented to the Ontario Fire Marshal for consideration.

Since the inception of the unit three years ago, TFS has continued to identify common themes of inadequate records as it related to annual fire alarm test and inspection records. TFS ensures these deficiencies are corrected. Any emerging patterns are also shared with all TFS inspection staff who are engaged in routine inspections for awareness creating an enforcement multiplier effect. General inspection staff will refer files to the QA inspection review team for a more detailed analysis when suspected anomalies are flagged. Upon conclusion of the QA inspection review, TFS takes the necessary enforcement options including the issuance of orders or prosecution to ensure compliance with the OFC and fire safety of the occupants.

TFS will continue to review the data from this unit year over year to improve the fire safety of Toronto residents and the impact on compliance in the industry.

## **CONTACT**

---

Larry Cocco  
Deputy Fire Chief, Community Risk Reduction, [Larry.Cocco@toronto.ca](mailto:Larry.Cocco@toronto.ca)

## **SIGNATURE**

---

Jim Jessop  
Acting Fire Chief and General Manager-Emergency Management  
Toronto Fire Services