



## Briefing Note - Summary of Review of Complaint Relating to Contractor

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**Date:** January 20, 2026  
**To:** Scott Collier, President, Toronto Parking Authority  
**From:** Arlene Yam Fritz, Vice President Human Resources

### PURPOSE

This briefing note summarizes the findings of three parallel investigations relating to a complaint received by the Toronto Parking Authority (“TPA”) under the *Whistleblower Policy* from a Contractor, a former vendor of the TPA doing business as a provider of professional services. (“Complainant”).

### BACKGROUND

On May 1, 2025, at approximately 10:15PM, the TPA received a complaint from the Contractor, regarding three allegations of:

1. The backdating and manipulation of records (change requests) in relation to the TPA’s PCI DSS compliance and audit processes (“Allegation 1”);
2. Lack of appropriate RFP procurement procedures related to vendor selection and contract approvals in relation to a vendor’s work on network design (“Allegation 2”); and
3. Lack of valid contract and the denial of payment or compensation for additional services performed by Complainant (“Allegation 3”).

In accordance with its Whistleblower Policy, the TPA reviewed the complaint. Due to the nature of the complaint and the internal TPA parties involved in this complaint, the TPA requested the City of Toronto’s Internal Audit Division (“City Internal Audit”) to review and investigate Allegation 1 and Allegation 2 of the complaint. The VP, Human Resources TPA (“VP Human Resources”) reviewed and investigated Allegation 3, regarding contract status and denial of compensation.

## **METHODOLOGY**

For all three investigations, the TPA facilitated access to individuals at the TPA who were identified through the investigation as possessing knowledge relevant to the various allegations. Relevant records were identified and provided for review - including emails, audio files, policies, and IT system information. Several individuals, including the Complainant and others involved, were interviewed over the course of the investigation. The investigations focused on neutral inquiry, confidentiality, and/or non-retaliation.

Allegation 1: City Internal Audit worked closely with its CISO office and retained a third party to assist with the investigation into Allegation 1. The PCI Manager within the City's Accounting Services Division was engaged to provide an overall assessment of the findings as they related to PCI. The approach included the identification, collection, preservation and analysis of relevant data, including interviews with relevant individuals.

Allegation 2: City Internal Audit worked closely with the VP Human Resources to obtain and review related documentation and policies. The review included but was not limited to: An assessment of Toronto Parking Authority's procurement policies, processes and procedures; a review of relevant records and documents pertaining to the procurement; and discussions / interviews with Toronto Parking Authority staff.

Allegation 3: The VP Human Resources conducted discussions with the individuals involved in this allegation. Relevant emails, invoices and other documentation were obtained from the parties, and from TPA's financial and email system.

## **SUMMARY OF FINDINGS**

The investigations into the allegations are complete and a summary of the findings are below:

### **Allegation 1 – Integrity of PCI DSS Audit**

As per TPA's external Quality Security Assessor (QSA) Audit results, internal and external vulnerability and threat scans were conducted and it was validated that there were no security breaches or data compromises.

The review did not confirm allegations of wrongdoing but confirmed that TPA staff did not follow established process standards and that certain forms requesting modifications to components within the IT infrastructure (referred to as Change Request forms) were not dated in accordance with the associated work performed and inconsistent with established process standards within the TPA. While these deficiencies did not compromise TPA's controls governing the protection of cardholder or other sensitive data, they may present risks to PCI compliance standards related to governance and change management controls.

TPA is taking immediate action to address these processes and executional gaps.

## **Allegation 2 – Compliance with Procurement Processes**

The review noted areas where the procurement was not conducted fully in accordance with Toronto Parking Authority's procurement policy. The Limited Solicitation Exceptions process was used to procure a vendor to assess TPA's existing network infrastructure and propose a solution to upgrade the network. While the Limited Solicitation Exceptions process is permitted for procurements valued under \$100,000, per Policy 5-7 Appendix A, a formal RFQ or RFP including technical evaluation criteria is required for the procurement of professional services between \$20,000 and \$100,000.

TPA has reviewed its procurement policy and has taken steps to update its policy and appendices to align with the City of Toronto's Procurement Policies.

## **Allegation 3 – Review of Complainant's Contract and Compensation**

The Complainant performed services under valid contract terms and conditions. The consulting contract's initial term expired September 30, 2023, with no formal executed written extension. However, there is no evidence that either party objected to the continued existence of the contract or suggested negotiation of new terms. Despite the absence of a formally executed extension agreement, the conduct of the parties demonstrated an intent to remain bound by the original terms. Both parties continued to act as if the contract was still in effect in terms of price and payment, delivery of services, and compliance with obligations.

No evidence could be found to support that payment was withheld for extra hours submitted and in dispute. All invoices and associated timesheets were reviewed for 2024 and for the period from January to June 2025. All invoices were confirmed as paid by TPA, including invoices that billed for extra hours.