Review of Toronto Police Service - Opportunities to Support More Effective Responses to Calls for Service

A Journey of Change: Improving Community Safety and Well-Being Outcomes

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Executive Summary

This review examines the Toronto Police Service (TPS)'s policing responsibilities and service areas to identify opportunities for improving efficiency and effectiveness and potential alternative responses to calls for service.

TPSB requested the Auditor General conduct a risk assessment and audits of TPS

At the request of the Toronto Police Services Board (TPSB), the Auditor General completed a risk assessment of TPS to develop a risk-based audit plan. This plan, which was independently developed by the Auditor General, sets the audit priorities at TPS over the next five years.

The Auditor General's other project entitled "*Toronto Police Service – Audit of 9-1-1 Public Safety Answering Point Operations Better Support for Staff, Improved Information Management and Outcomes*" examined whether the Toronto Police Service's 9-1-1 Communications Centre provides access to emergency services in an effective and timely manner, and identified potential areas of improvement to the efficiency and economy of operations.

Why this review is important

In a city with almost three million people, demand for police resources is high. As response times increase and TPS faces budget constraints, the Service must determine the most efficient and effective allocation and use of its front-line resources. At the same time, the City and TPS must continue to work together to provide call for service responses that provide the best possible outcomes for the people of Toronto, especially those most vulnerable.

What We Found and Recommend

Findings in 3 main areas

The issues and recommendations discussed in this report can be categorized into three broad themes:

    A. Re-thinking Call for Service Response to Support More Efficient and Effective Outcomes

    B. Improving and Further Leveraging Data and Technology

    C. Increasing Integration and Information Sharing

The following are our key observations related to these themes.

A. Re-thinking Call for Service Response to Support More Efficient and Effective Outcomes

Not all calls for service require an immediate police response

As first responders, TPS officers are on the front lines and respond to a variety of situations. Historically, for some people, contacting the police has been their "go-to response" for assistance and they have an expectation that police will respond to their calls whether they are emergencies or not. Also, in some types of situations, there is no one else available to respond, or not at the times needed. However, a Priority Response Unit (PRU) police response is not intended to and cannot resolve the complex needs of some vulnerable people, such as those experiencing homelessness or mental health challenges.

TPS has become the default response for some situations

As illustrated in Figure 1 below, for some lower priority, non-emergency calls for service, PRU officers have effectively become the default response for providing assistance in some situations, due in part to the lack of available effective alternate responses at the times they are needed. Individuals we interviewed during our review, including members of TPS, the Toronto Police Association and City staff, were aligned with this view about the lack of alternative responses.

Figure 1: What Has Been Happening
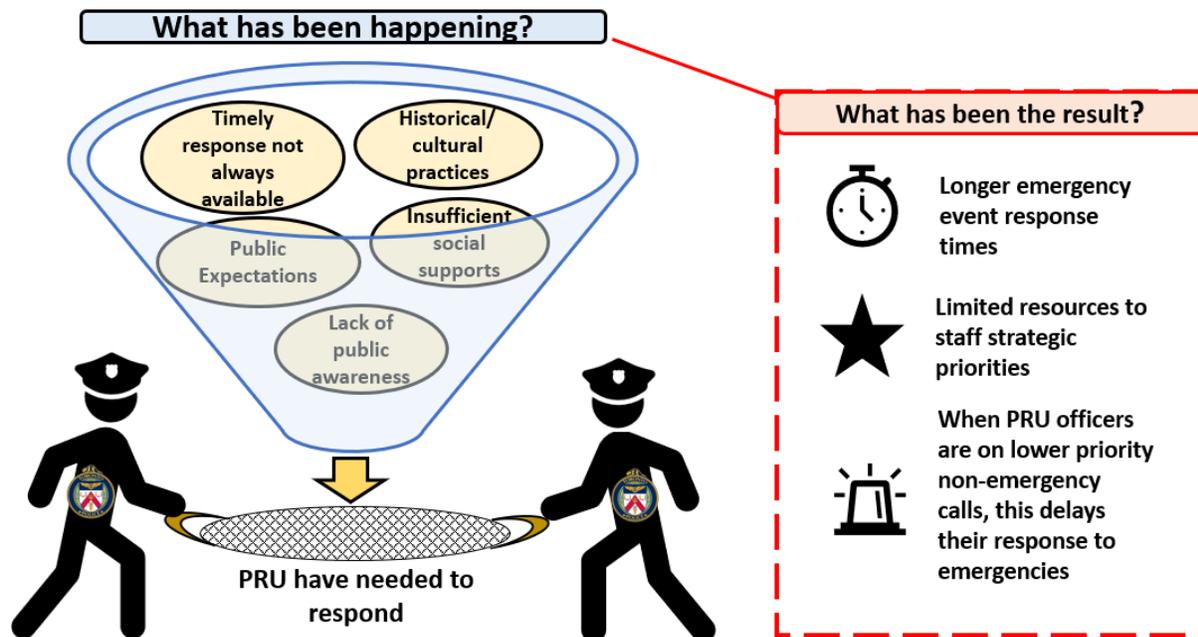
Underinvestment in mental health supports in Canada

Underinvestment in mental health resources in Canada has also meant that people with mental health challenges may not always receive the supports they need[1]. This sometimes results in police officers becoming the default first responders in some situations involving those in crisis[2].

We reviewed over 300 dispatched calls for service

In total we reviewed over 300 calls for service dispatched between January 2018 to July 2021, to assess if an on-scene, PRU police officer response was essential, or if the event could have been potentially addressed by a non-PRU police response[3], or alternative non-police response.

We wanted to see a range of what was happening on calls for service, particularly for the lower priority four to six, non-emergency event types. TPS's definitions of the priority ratings can be found in Figure 2. Our initial sample focused on select event types.

We excluded most higher priority one to three emergency event types, since many of these events are likely to require a police response[4]. These events include situations such as shootings, assaults in progress, break and enter in progress, etc., which are calls for service that involve or could involve imminent danger.

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[1] In the *"Changing Directions, Changing Lives: The Mental Health Strategy for Canada"* report, the Mental Health Commission of Canada indicates that *"…given the historical neglect of the mental health sector, the Strategy recognizes the need to invest more so that mental health outcomes can be improved."* and that *"…in any given year, one in five people in Canada experiences a mental health problem or illness, with a cost to the economy of well in excess of $50 billion"* (Link to Changing Directions, Changing Lives report).

[2] Recently, both TPS and the City have launched pilot programs that aim to offer a non-police response to certain mental-health related calls. These are discussed further in this Executive Summary.

[3] TPS already has several different groups that provide alternative PRU police responses. These are discussed in greater detail in Section A.1 of this report.

[4] Although this report includes issues regarding mental health, our project did not start with a mental health focus and therefore, we did not review calls for service classified by TPS using mental health event types (e.g. "Persons in Crisis", "Threatening Suicide", etc.). While these calls for service are classified as priority one to three, not all of these calls may require a police response. Response to mental health calls is a separate area listed on the Auditor General's Proposed Risk-Based Audit Plan of TPS and may be addressed as part of a future audit (Link to AG's Risk Based Audit Plan of TPS).

Figure 2: TPS's Definitions of Priority Ratings

	Priority Rating	TPS's Priority Rating Description	Examples	
Emergency	**1**	*Most urgent* situations that require upgrade from another priority. The dispatcher may assign the event to any unit from anywhere across the city. It is assigned to any call that poses a threat to life, limb, property, evidence or arrest.	**Default Priority 2** Shooting Stabbing Holdup Hostage Situation Robbery in progress Impaired Driver Break and enter, just occurred	**Mostly Out of Scope; Analytical Review Only** *except for See Ambulance calls[5]
	2	Events that require *immediate* police attendance and where the potential for danger and/or injury is present or imminent		
	3	Events which have been changed from the default priority based on the circumstances of the event		
Non-Emergency	**4**	Non-emergency situations where potential for *imminent* danger and/or injury is not a factor	**Default Priority 4** Check Address Unwanted Guest Dispute Noisy Party **Default Priority 6** Theft of Gas Property Damage Accident Lost Property Parking Complaint	**In-Scope for Detailed Review**
	5	Events which have been changed from the default priority based on the circumstances of the event		
	6	Non-emergency situations where potential for danger and/or injury is not a factor		

We focused on 6 event types that may be suitable for an alternative response

From our initial sample, we then identified six event types[6], illustrated in Figure 3, as having the greatest opportunity for a non-PRU response and expanded our sample to focus on those items (we also looked at See Ambulance calls for service, classified as priority two, and discussed later in this Executive Summary). We used these six event types (all classified as default priority four) as a window to see what is possible, but there may be other event types that also have potential for alternative responses.

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[5] See Ambulance is an event type (default priority two) where paramedics request the assistance of police on medical related calls for service.

[6] Apart from the criteria mentioned above, our sample population only included calls for service where at least one PRU unit was dispatched and excluded certain events. For example, we excluded those events that resulted in an apprehension/arrest, charges laid or pending, events assigned to the Parking Enforcement Unit group, events initiated by officers, events where individuals requested assistance in-person at TPS divisions, and events assigned to TPS's alternate response unit groups.

Figure 3: Six Event Types We Focused On
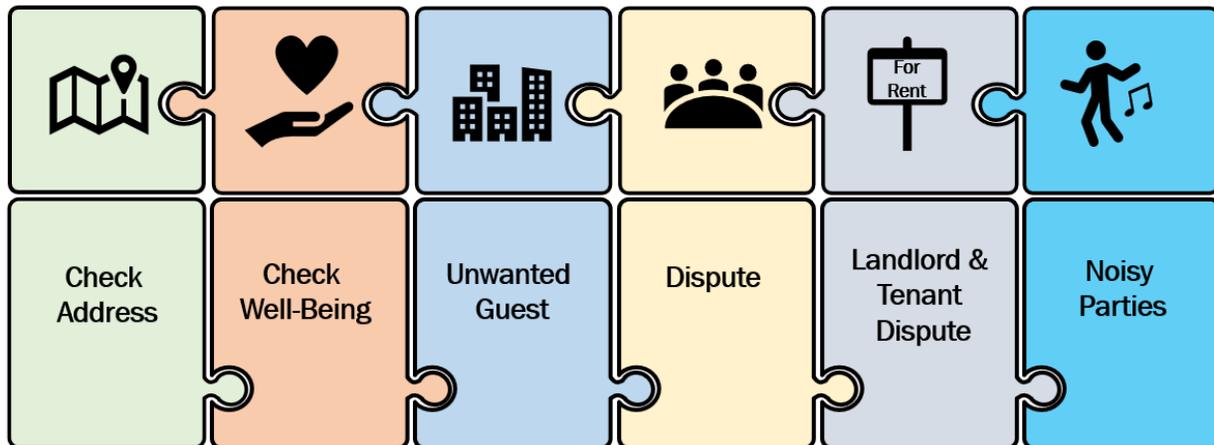
Check Address	Check Well-Being	Unwanted Guest	Dispute	Landlord & Tenant Dispute	Noisy Parties

40% of the calls for service we reviewed across six lower priority event types could possibly have been handled by an alternative response	In approximately 40 per cent[7] of the calls for service for these six lower priority event types included in our sample, the circumstances of the call for service at the time of dispatch suggested that on-scene PRU attendance may not have been essential, and that a non-PRU police response, or alternative non-police response may have been able to handle the event. Our conclusions were informed in consultation with a panel of experts which included former law enforcement officers.
There are opportunities for some calls for service to be handled differently	Many of the calls for service in the event type categories we reviewed would still likely require a PRU police response. We also recognize that many calls for service have the potential for danger, including those that originate as low priority, non-emergency calls. However, there is the potential for some to be handled differently, if an effective and timely alternative response were to be available.
TPS could save at least 85K hours of PRU time over a projected 5-year period	Based on average time-on-call for the event types above, we estimate that TPS could potentially save at least 85,000 PRU hours over a projected five-year period[8], if even some of these calls for service received a non-PRU response. This savings in time could be used to improve TPS call for service response times and/or to address other TPS strategic priorities.

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[7] Total percentage is based only on the six event types, as outlined in Figure 3, for the items that were included in our sample.

[8] Based on our sample population which was less than the full population of TPS priority four calls for service as shown in Figure 11 of this report. Also, the estimated hours are based on average time spent on call for PRU units in our sample population. The term "unit" refers to the officers that attended the call for service together and are using the same identifier. For example, there may be two officers in one vehicle attending the same event, and those officers are collectively referred to as a unit. However, a unit may also be composed of a single officer. As a result, these numbers are likely conservative.

Non-police alternative response models that address underlying root causes should be explored	The City, in collaboration with TPS and other agencies should continue to explore non-police alternative responses that are able to provide wrap-around and community-based supports that could also help promote better outcomes for vulnerable populations within the city, especially those experiencing homelessness and mental health challenges.

Opportunities to Re-visit Response to See Ambulance Protocols

PRU officers being dispatched when alcohol is present	We noted that PRU officers sometimes attended calls for service, at the request of Toronto Paramedic Services, where the main complaint was medical and there was no apparent/immediate safety risk or danger. In some of our samples, it appeared police were dispatched when the presence/consumption of alcohol was mentioned by the caller.
See Ambulance calls are one of the mostly frequently dispatched call for service event types with over 26K calls in 2019	In 2019, there were over 26,000 See Ambulance calls for service dispatched, one of the most frequently dispatched call for service event types. If even a small portion of these decreased, this could have a significant impact on PRU time. Also, when police attendance is requested and dispatched on these types of calls and not truly needed, this ties up resources. Until officers clear the call for service, they are generally not available for a high priority emergency call for service, and this can negatively impact response times.
Need to better define why police are required	Also, while Toronto Paramedic Services procedures require call takers to clearly document the reasons for police notification in their call for service system, we could not locate a clear rationale for requesting police in almost all of the call for service documentation reviewed.

Toronto Paramedic Services management indicated that the rationale for police attendance can be inferred from the factors documented in the call for service (e.g. presence of alcohol) and given the volume of calls for service, call takers are limited in their ability to document details regarding why police were requested. |
| **See Ambulance protocols between the two entities should be revisited** | When Toronto Paramedic Services request TPS to attend calls for service where there is no clearly articulated risk of real or potential violence/safety hazards, PRU resources are being tied up. Also, when paramedics decide to wait for the police to arrive before attending to an individual, this could potentially delay emergency medical care and result in harm or loss of life. The average response time for a priority two call for service was 50 minutes (in 2019) and response times are continuing to increase. |

Refined risk-assessment is needed

We recognize that there are situations where police attendance at these types of calls for service is necessary to ensure paramedics are safe and to be able to provide life-saving services to residents.

However, given limited PRU resources and the importance of having PRU response available in situations where prompt attendance by someone with the training and authority of a police officer is essential, it may be timely to revisit the protocol between TPS and Toronto Paramedic Services, particularly related to the presence of alcohol mentioned in the call.

Toronto Paramedic Services should ensure that a risk-based approach, supported by a properly documented rationale and regular monitoring, is applied to ensure that all requests for police notification are an efficient and effective use of PRU time.

Response & Clearance Times

TPS considers response time a key performance metric but has faced challenges

Response time is a commonly used metric to evaluate police performance. TPS has used response times as a metric in assessing service performance for many years. However, as illustrated in Table 1, TPS has experienced increasing response times over the last several years.

For example, the average response time for priority one calls for service has increased about 19 per cent from 2017 to 2019[9] and 17 per cent for priority two calls for service.

The average time for TPS to respond to a priority one call for service in 2019 was 19.1 minutes, and 50 minutes for a priority two call for service[10].

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[9] The year 2019 was selected for illustration in some areas of our report given that it provides the most recent, normalized, full year of data. TPS reported that call for service data and response times in 2020 and 2021 may not accurately reflect the true state of operations due to the impacts of the COVID-19 pandemic.

[10] Response times are based on data provided by TPS (unaudited).

Table 1: Average Response Times from January 2017 to September 2021 and 2019 Performance Compared to 1995 Targets[11]

Priority Level	Average Response Time (Minutes)					Priority Level	2019 Performance Compared to Targets	
	2017	2018	2019	2020	Jan to Sept 2021		1995 Target (mins)	% Not Met
1	16.0	18.4	19.1	15.0	17.5	1	6	72%
2	42.6	45.5	50.0	39.2	45.9	2	6	92%
3	74.5	85.6	95.4	67.8	92.6	3	6	96%
4	94.6	109.2	120.3	89.4	110.9	4	60	41%
5	58.5	76.4	320.2	253.7	319.8	5	60	67%
6	189.9	268.2	299.2	244.9	282.2	6	60	57%

Increasing response times means the public waits longer for assistance

Priority one calls for service are emergency situations that require an immediate assistance such as danger to life. Increasing response times means the public is waiting longer for assistance to calls for service.

Time spent on non-emergency calls for service delays response to other pending situations

Generally, officers are not available to respond to another call for service until they have cleared the current call for service they have been assigned to. Increasing response times may indicate at least in part, that officers are dealing with many call for service events that may not always be the highest priority. We also highlight other possible reasons for response time increases in section A.2 of this report.

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[11] At its March 1995 meeting, the Metropolitan Toronto Police Services Board (now the Toronto Police Services Board) approved recommendations from the report "*Beyond 2000: Final Report*" which resulted from the work of the Metropolitan Toronto Police Restructuring Task Force. Recommendation 11 of that report included response time standards and directed that the Metropolitan Toronto Police Force (now TPS) review at regular intervals its ability to achieve and maintain these standards and make adjustments as required. TPSB Office reported that no further changes to response time standards have been formally adopted since 1995.

While response time objectives were approved by the Board in 1995, based on our discussions with TPS management they are not regularly used or measured against as formal organizational performance metrics[12], nor were they evaluated or revised in the intervening time. The 1995 response time targets and the associated 2019 performance is displayed in Table 1 above.

Although we were initially provided with updated response time targets (for priority one, 10 minutes 85 per cent of the time, for priority two and three, 16 minutes, and for priority four to six, 60 minutes), these have not been included for comparison purposes. Based on the information provided to us, these targets were designed to be used for development of the PRU alternative shift schedules, and not for TPS's response time performance metrics[13], and have not been formally approved by TPSB or TPS.

TPS did not meet its 6 minute target for 72% of priority 1 calls for service in 2019	In 2019 TPS did not meet its target of six minutes 72 per cent of the time for priority one and 92 per cent of the time for priority two calls for service.
Increasing clearance times can delay other calls for service	Overall, average clearance times (the difference in time between when officers arrive at-scene to a call for service and when they are available to be dispatched to a new call for service) have also increased almost 15 per cent from 2017 to 2019, with the most pronounced increases for priority 5 and 6 calls for service which increased approximately 41 and 46 per cent respectively[14].
TPS should better understand root causes of increasing response and clearance times	It will be important for TPS to better understand the root causes of increasing response and clearance times, including differences between TPS divisions and event types, in order to ensure calls for service are efficiently handled so that officers can respond to high priority, emergency calls for service as quickly as possible.
Benchmarks or standards for clearance times may provide insights	TPS should consider setting divisional or TPS-wide reasonableness thresholds to have a benchmark that can be used to evaluate call for service activity and identify trends at a high level. This may help to inform potential training needs and high-level staffing/resourcing decisions.

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[12] See footnote 11

[13] The Toronto Police Association advised that a consultant was engaged to analyze PRU staffing and workload, as well as alternative shift schedules and as part of this work developed and used updated response time targets solely related to the travel time of officers.

[14] TPS management provided some possible reasons for increasing clearance times and these are included in Section A.2 of this report.

B. Improving and Further Leveraging Technology and Data

Better data will help improve outcomes

The need for better data and improved analysis was a theme found throughout this project, as well as in the Auditor General's report *"Audit of 9-1-1 Public Safety Answering Point Operations"* (*"Audit of TPS - 9-1-1 PSAP Operations"*). TPS identified technology and information management as one of its strategic priorities, including using data analytics and evidence-based decision making.

Progress has been made but much work lies ahead

Although progress has been made, much work still lies ahead, and a number of opportunities remain for TPS to move its technology programs forward. TPS should improve the collection and use of data to support more effective decision making and ensure efficient and effective use of PRU and other officer time.

We were limited in our ability to perform certain testing due to limitations with the data

In completing our review, we encountered serious challenges with the available data. In reviewing calls for service, a lack of detailed data fields in the call for service system (referred to as the I/CAD system) limited our ability to filter and analyze the entire population of calls for service for the event types we wanted to explore further. For example, to analyze whether certain calls for service involved people experiencing homelessness or mental health challenges, there was no easy way to filter the data in order to understand the nature of the calls for service and identify trends.

Given these challenges, it was necessary for us to take a manual approach of reviewing a sample of calls for service, analyzing extensive documentation that included listening to caller audio files, and reviewing officer notes, reports and other documentation to better understand the nature of each call for service and the events that transpired.

While detailed review of certain calls for service will sometimes be necessary to understand the nature of events, this approach is not sustainable for the necessary long-term, regular evaluation and analysis TPS will need to perform. It will not be possible for TPS to analyze and better understand the various calls for service it responds to, including those which may be appropriate for an alternative non-police response, without making the necessary improvements to its data.

We also encountered data reliability issues

We also encountered challenges with data reliability in attempting to review staffing and disability and accommodation data.

Better data is needed for TPS to effectively carry out strategic change

Without better data, TPS will be limited in its ability to effectively implement important strategic initiatives, including alternative response delivery and ensuring PRU resources are used in the most efficient and effective way possible.

Opportunities exist for TPS to leverage technology and data

As shown in Figure 4 below, we've identified opportunities for TPS to improve the collection and use of data, and leverage technology which may help to divert certain calls for service, free up some call taker and officer time, and allow for better monitoring and more informed decision making. These opportunities include:

- improving time tracking and staffing data to better monitor resourcing;

- improving call for service data to better monitor how time is spent;

- assessing PRU response to frequently dispatched locations;

- freeing-up officer time by automating and streamlining the reporting process; and,

- using technological solutions for call for service diversion and to support call for service clearance.

Figure 4: Opportunities to Improve and Increase Use of Data and Technology

PRU time spent on calls for service can include report writing and other activities

Officers responding to calls for service are required to perform a number of steps relating to resolving and documenting an event. For example, officers may write and file police reports, and complete forms and other administrative or documentation related requirements. During the call for service itself, officers may also perform a variety of activities such as mediating between parties, referring to other resources, investigating, etc.

More detailed time information would allow for enhanced decision making

However, the I/CAD system does not provide a breakdown on how much of the total time on call for service was spent addressing the call, and how much time was spent on other activities. We noted that there are certain administrative event type categories in the I/CAD system, but they can be broad and do not always clearly indicate what the officer did during that time.

Quality issues with certain data sets

TPS management also informed us of gaps in the reliability of the Time Resource Management System data and we noted data integrity issues with disability and accommodation data which limited our ability to perform analysis in this area.

More accurate, detailed and complete information will allow management to better assess how officers are spending their time and the resources available, which should help with more effective resource allocation and operational decision making.

Improving Call for Service Data to Better Monitor How Time is Spent

Some call for service event types can be broad

Some call for service event types can be broad and cover a range of different scenarios. For example, we noted that Check Address, one of the most commonly dispatched event types, can cover a variety of circumstances, from searching for stolen vehicles, to requesting that officers check on the well-being of an individual.

What transpires during calls for service not readily apparent without detailed review

Furthermore, as previously mentioned, the details of what transpired during a call for service cannot always be reliably or easily obtained, without reviewing various sources of documentation, such as listening to caller audio, or reviewing police reports. For example, TPS does not have a way (e.g. data field or flag) to reliably or easily determine how many calls for service involve persons experiencing homelessness, or mental health challenges, outside of the designated event types.

Collecting more data on calls for service will provide more readily available insights	TPS should improve the collection and analysis of its call for service data so that it includes more detailed sub-categories or data fields that indicate the nature of the calls for service attended by officers. This will allow for more robust data analysis and provide data that may help inform training plans, staffing/resourcing and other operational decisions.
Collecting data will be helpful in considering alternative responses	We recognize that some calls for service involving people experiencing homelessness or mental health challenges might still require a police response. However, collecting more readily available information on calls for service involving vulnerable people will be helpful in considering alternative responses and ensuring the best possible outcomes for these individuals. This may also provide insights that could be helpful to TPS in developing strategies for responding to these types of calls for service where police will still be required to respond.
	In collecting any personal health information, TPS will need to consider any relevant collection and storage considerations, as well as compliance with applicable legislation, such as the *Personal Health Information Protection Act*.
	Assessing PRU Response to Frequently Attended Locations
TPS does not routinely examine data to identify repeat addresses of concern	We identified a number of locations where the PRU have attended hundreds of times since 2018[15]. For example, we identified four addresses which appear to be fast food restaurant locations where TPS has cumulatively attended over 1,000 times from January 2018 to July 2021 for Unwanted Guest calls for service. Management reported that many of these calls for service involved persons experiencing homelessness.
PRU officers routinely visit some locations	TPS does not routinely conduct analysis on locations where the PRU attend frequently, to better understand if police are needed, the nature of police attendance, and if the number of times police attend can be reduced[16].

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[15] Given the data limitations we describe in Section B of this report, we were unable to determine the nature or circumstances of the events, beyond the explanations provided by management. The locations we identified were based on research of the address locations provided in the call for service data. For example, we noted that the addresses in the data corresponded to locations where restaurant chain locations or hospitals were located. However, some of these locations were operating in busy intersections in close proximity to other businesses/locations so it is possible that some calls for service at these locations may relate to other matters.

[16] We noted that TPS management have access to a dashboard which includes top locations for certain crime indicators, such as break and enters, auto thefts, and frequent offenders. Our report focused on low priority, non-emergency events where PRU are being dispatched, which may not involve a crime or criminal charge.

TPS should work with TCHC and hospitals to free-up PRU time	Many calls for service involved repeat visits to hospital locations and Toronto Community Housing Corporation (TCHC) buildings. While there are calls for service that will still need to be addressed by TPS, there may be opportunities for TPS, in collaboration with the City, hospitals, and TCHC, to determine alternative strategies to resolving these repeat calls for service.

Opportunities to Free-Up Officer Time by Automating and Streamlining Reporting Process

Automating manual processes may help	We noted a number of opportunities where increasing automation to enhance manual processes would likely drive more efficiencies.
Manual note taking is inefficient and increases time spent on a call	TPS procedures require officers to carry memorandum books (known as memo books) or unit-approved notebooks while on duty to record notes of arrests, investigations, significant events and the activities that occur during their shifts. Manual note taking is an inefficient process that can increase time spent on a call for service and may delay officers from attending other pending calls for service.
TPS should accelerate an electronic memo book solution	While TPS is pursuing a Digital Officer Program, which will involve an electronic memo book solution, it should consider if it can accelerate the initiative so that officers can spend more time attending high priority emergency calls for service as well as engaging the community, and less time documenting.

Opportunities to Use Technological Solutions for Call for Service Diversion and to Support Call for Service Clearance

Digital strategies such as video calling may help free up PRU officer time	There are also a number of digital strategies that can be deployed that may help reduce the number of calls for service where a PRU officer must attend on-scene, and to improve the efficiency and effectiveness of collecting information relating to calls for service. Addressing some calls for service through live video technology may be a way for TPS to avoid sending PRU officers on-scene to non-emergency or low risk calls for service, and free up officer time.
Automating call for service information collection may help	Also, developing tools to allow callers to provide as much information as possible, and to allow two-way interaction with TPS without the need to speak to a call taker, may assist with more effective and efficient call for service response.

C. Increasing Integration and Information Sharing

TPS is a key partner in the well-being and safety of the people of Toronto, and TPS and the City should continue to work together	While TPS receives a variety of calls for service from the public, not all are situations that TPS can effectively resolve on its own. There are further opportunities for TPS and the City to increase collaboration with each other and with other agencies to continue to work together to improve outcomes.

Both the City and TPS have launched mental health pilots

We noted calls for service related to mental health and homelessness are sometimes attended by front-line police. A preventive approach and wrap-around supportive response by the City and other agencies would likely provide more effective overall outcomes for these individuals and communities.

Both the City and TPS have launched pilot programs aimed at diverting certain non-emergency mental health-related calls for service to trained mental health crisis workers, instead of police officers. The City launched its Toronto Community Crisis Service pilot in March 2022 and will explore the use of non-police led, crisis response teams for certain calls for service involving mental health. At the same time, TPS has also launched its own pilot, the Gerstein Crisis Centre call for service diversion pilot.

Collaboration and evaluation will be important in evaluating outcomes

While there are opportunities for synergy between the two pilots, there is also the potential for possible overlap, making it necessary for careful joint evaluation and collaboration. Pilot evaluation strategies should include considerations regarding what data will be available to review, how it will be reviewed, and who will be able to access the data.

Also, in deciding next steps for both pilot programs, TPS and the City should consider the recommendations for alternative responses in Section A.1 of this report.

FOCUS program may help free up PRU resources

Furthering Our Community by Uniting Services (FOCUS) is a community-based approach co-led by the City, United Way of Greater Toronto, and TPS, that aims to reduce risk, harm, crime, victimization, and improve community resiliency and well-being.

Referrals are manually provided and not always tracked

The FOCUS program appears to be a potential solution to help free up front-line PRU resources through identifying situations where a non-police response would help reduce frequent/repeat contacts. However, the referral process is manual, largely relying on officers to call or email a FOCUS representative.

Automation could help increase FOCUS and other community referrals

Apart from formal referrals through the FOCUS table or partner agencies, TPS members can also refer people directly to community support programs and agencies. TPS could consider automating the process to track and generate referrals (both FOCUS and non-FOCUS related), such as through using a flag /field on calls for service, or a digital application. This will help with evaluating program outcomes.

Mental Health Act governs police apprehensions relating to persons in crisis

In Ontario, the _Mental Health Act_ (MHA) permits police officers to apprehend individuals suffering a mental health crisis under certain conditions that include if the officer has reasonable grounds to believe that a person is acting or has acted in a disorderly manner, and has reasonable cause to believe the person is a threat or at risk of causing harm to themselves or others[17]. Under the Act, when police officers make apprehensions, they must take the person in custody to be examined by a physician, which usually occurs in a hospital setting.

PRU officers can spend hours waiting in hospitals

The officer must wait with the apprehended person and retain custody until a person designated by the hospital as authorized to accept care does so, and this can take hours.

Based on mental health apprehension data provided by TPS, from January 2018 to July 2021 the average wait-time for custody transfer to a hospital official was over 1.5 hours, with approximately 30 per cent of apprehensions resulting in waiting times of two hours or more[18].

Every minute a PRU officer waits in a hospital waiting room reduces the time that officer is available to support public safety efforts, reactively and proactively, in their assigned divisions.

TPS is pursuing strategies but improvement is still needed

TPS is pursing a number of strategies to free up PRU officers to respond to other calls for service, such as using its district special constables to wait at hospitals and establishing police-hospital liaison committees with some hospitals that work to address issues, including PRU hospital wait times.

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[17] The full conditions can be found here: Section 17 - Mental Health Act. In addition to police officer initiated apprehensions, the Mental Health Act also allows for other circumstances where police may be required to apprehend and transport an individual. For example, some apprehensions may be initiated at the request of a physician or justice of the peace or result from a community treatment order. As part of the community treatment order process, under certain circumstances police officers may be required to transport individuals to specific facilities.

[18] Based on hospital wait time data provided by TPS. This number is likely conservative given that wait-time data provided was only available on a per-event basis, instead of per-officer basis. In some occasions, more than one officer will wait with an apprehended person and therefore the cumulative total number of hours spent waiting, are likely greater than what is presented in this report.

However, these strategies could be further improved and expanded to try and find solutions to this problem. Committees have not been formed at several of the hospitals TPS routinely visits related to mental health apprehensions in Toronto, and only a limited number of district special constables are available.

Preventative approach may help minimize mental health apprehensions

A preventative approach that looks to minimize the number of mental health apprehensions, such as through the Toronto Community Crisis Service pilot, may also help to alleviate the pressures on PRU officers tied up in hospital waiting rooms. This would allow PRU officers to be available to respond to other pending priority calls for service and provide better outcomes for residents and community members.

Patient distribution system may be helpful

TPS should also consider if there are any technological solutions that can be deployed, such as the patient distribution system in use by Toronto Paramedic Services. This system assists with distribution of patients to the most appropriate hospital based on certain factors including the severity of the illness/injury, services required, and hospital proximity.

TPS should consider pursuing legislative changes

In addition to strategies to reduce wait times, it may also be good timing for TPSB, in consultation with TPS and other stakeholders, to request changes to the legislation for mental health apprehensions, particularly regarding the requirement for a police officer to retain custody while waiting at hospitals.

In considering its request for potential changes, TPS and TPSB should also consider the impacts of any findings and recommendations from any relevant prior reviews, as applicable.

<u>Working Together with 3-1-1 Toronto on Call for Service Diversion</u>

TPS and City have considered strategies for call diversion to 3-1-1 Toronto

For some people, contacting the police through 9-1-1 has been their "go-to response" for assistance, including for non-emergencies. This is in part because 9-1-1 is free and an easy number to remember, they may not be aware of other numbers such as 3-1-1, and/or they may not be satisfied with the City's response or may be referred by the City back to police.

Management indicated that police may be dispatched to these non-emergencies because if they don't respond and something goes wrong as a result of that decision, there could be potential legal risks for TPS.

Joint *Non-Emergency Calls and Dispatch Steering Group* was established as a result of the *Way Forward*	As a result of the *Way Forward*[19], a joint *Non-Emergency Calls and Dispatch Steering Group* between the City and TPS was set up with the goal of identifying the appropriate agency/organization to respond to non-emergency calls. The expected impacts were an increase in calls directly to 3-1-1 Toronto, and increased response by City divisions (Municipal Licensing and Standards and Transportation Services) to calls for service that would have otherwise gone to police.
Calls for service assigned to the 3-1-1 Referral event type have not seen significant decline	Calls for service where TPS call takers refer callers to 3-1-1 Toronto are captured under the 311 Referral event type[20]. Since 2018, the number of calls referred to 3-1-1 Toronto by TPS have not seen significant decline since the shared response model was developed. If the shared response model were functioning as intended, one expected outcome would likely be a general decline in the number of times TPS call takers have to refer callers to 3-1-1 Toronto, due to an increase in the number of calls made directly by callers to 3-1-1 Toronto.
Increased evaluation of 3-1-1 Toronto call for service diversion is needed	While TPS management conducted an analysis of calls for service referred to 3-1-1 Toronto at the beginning of 2019, no further analysis has been conducted by either the City or TPS since to assess if call for service diversion strategies are working as intended. We also noted opportunities for TPS and 3-1-1 Toronto to ensure that roles and responsibilities are clearly understood by staff. Regular joint analysis and review of 3-1-1 Toronto call for service diversion strategies by TPS and the City will help ensure that they are working as intended.
Increased information sharing between 3-1-1 Toronto and TPS could be helpful	We also noted that TPS and the City do not routinely share noisy party and noise complaint data on a per event basis so that proactive management of noise issues can be addressed. Increasing the information shared between 3-1-1 Toronto and TPS on a per call for service basis (e.g. addresses where police respond to noisy parties) may help identify trends and provide the City with information to address the root cause of issues that are not police matters.

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[19] The Transformational Task Force released a report in 2017 titled *Action Plan: The Way Forward ("Way Forward")*. The action plan was aimed at creating a modernized, innovative, sustainable, and affordable police model ([Link to Action Plan: The Way Forward](#)).

[20] This only includes calls for service received through TPS's Communications Services unit and classified by call takers as 311 Referral. Residents and community members can also call 3-1-1 Toronto directly to open service requests about City related programs and services and would not be tracked by TPS. Service requests made by residents directly to 3-1-1 Toronto were outside of the scope of our review.

Increased data sharing may help the City and TPS perform more proactive management of by-law issues and reduce the reliance on dispatching TPS officers. However, before undertaking any data sharing, a review of relevant privacy considerations should be performed, in consideration of the *Municipal Freedom of Information and Protection of Privacy Act*, and any other relevant legislation.

<u>Using 2-1-1 Central Data and Community Resources</u>

TPS should consider using 2-1-1 Central data to help drive decision making

2-1-1 Central, operated by Findhelp Information Services[21], operates a 24 hours a day, seven days a week helpline and website available to the public to provide information on and referrals to community, social, health-related and government services.

2-1-1 also maintains data related to the services people are looking for, and when they contact 2-1-1. If analyzed in conjunction with TPS call for service data, this information may be helpful in providing insights to TPS on where front-line resources are regularly deployed, where demand for community services may exist, and assist with potential community-based alternative solutions.

<u>Increased Public Education and Awareness May Lead to Better Outcomes</u>

Greater public awareness and education may be needed

As outlined in Section A.1, in some calls for service we reviewed, TPS did not appear to be the appropriate agency to resolve the call for service. These instances highlight the need for greater and ongoing public education on who is the appropriate agency to contact to resolve the caller's issue. Increasing public education may help as a preventative measure to avoid some police calls for service and/or having front-line resources dispatched.

There may also be a need to increase public awareness and challenge societal perceptions about people experiencing mental health issues and/or homelessness. These groups may experience stigma and discrimination, including fears that they may be violent. This could potentially lead to calls for service to police even in situations where there are no indicators to suggest the risk of violence or harm.

"Toronto For All" initiative may help create public awareness

The City reported that since 2016 it has collaborated with community partners through its "Toronto For All" initiative to create public awareness campaigns addressing implicit biases, negative attitudes and stereotypes, that can have an impact on ensuring Toronto is an inclusive and equitable city for everyone.

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[21] Findhelp Information Services is a third-party agency that is funded by the City, the Government of Ontario and the United Way of Greater Toronto.

There may be an opportunity for the City to use this initiative to draw attention to these perceptions and to highlight when to consider if a non-police response, such as through the City's street outreach program, may be more appropriate, recognizing that police may still be needed depending on the circumstances.

Conclusion

TPS has effectively become the default response in some situations, responding to some calls for service that are not police matters, due in part to the lack of available effective alternate responses at the times they are needed.

TPS alone cannot support the needs of vulnerable individuals

Furthermore, a lack of adequate supports for vulnerable individuals including people experiencing homelessness, mental health and substance use challenges, has resulted in a default police response to some calls for service. Supporting the complex needs of these individuals is not something that a police emergency response was intended to resolve and alternative community-based responses, if in place and available when needed, can help to provide the needed social supports for people.

Modernizing and enhancing the way data is captured and leveraged provides the opportunity for TPS to work with the City and stakeholders in an informed way to divert some non-emergency 9-1-1 calls, as well as some calls for service to alternative responses that may be able to provide more appropriate supports.

In our view, based on the results, it is not a 'lift and shift' of calls for service and funding, but a strategy of gradual transition for alternative non-police responses where appropriate, with the shared goal to improve outcomes for the people of Toronto.

These are complex matters needing better information to support transition. Opportunities for alternative responses may grow over time as better information is captured and analyzed, and while alternative responses are piloted and evaluated for potential further roll-out.

Once the pilots for alternative non-police responses have been established and evaluated, which will take several years, funding levels and sources should be re-assessed. Other factors impacting both TPS and the City should also be considered, including the population growth, the demand level to meet the needs of vulnerable individuals, strategic priorities and resourcing to achieve them, as well as other considerations such as the impact of mandated NG9-1-1 requirements.

Whole-of-government and whole-of-community approach needed with investment in social service infrastructure and alternative strategies

This review also highlights that a whole-of-government and a whole-of-community commitment and approach is needed. Strategic investment by all levels of government in social service infrastructure and alternative strategies is necessary in order to create long-term value for the City, for individuals and the community. The need for funding supports from other levels of government for social infrastructure is also mentioned in our recent audit of the City's emergency shelter program.

A journey of change is needed

As illustrated in Figure 5, improving community safety and well-being will require active leadership and commitment from the City, and multi-sector collaboration and partnership in pursuing alternative responses. Progress towards this goal will allow TPS to further focus on its strategic priorities. It is important for stakeholders to support one another to achieve the best possible outcomes for the people of Toronto.

Figure 5: A Journey Towards Change is Needed

Future Model with Better Outcomes

Collaboration between City, TPS, and other stakeholders

Current model
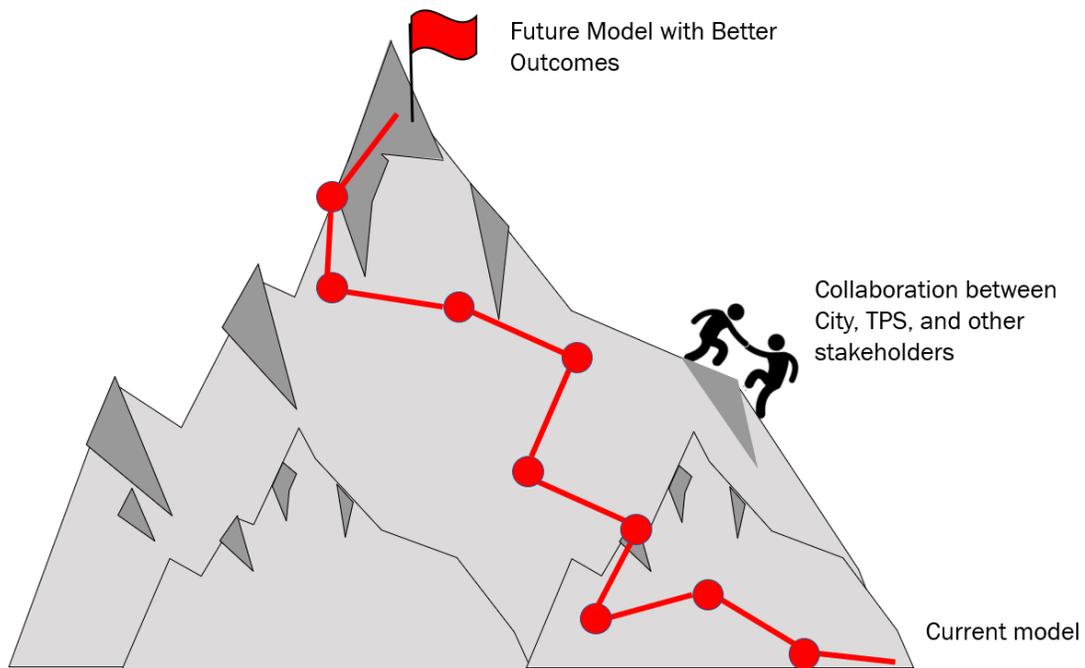
Plans, data, transparency and accountability are needed to move forward

It will be important for TPS, the City, and other stakeholders to develop concrete community-wide plans that include the desired outcomes and a framework to capture data, and track, evaluate and report out publicly on the progress of pilot outcomes. This can inform evidence-based decisions and ensure transparency and accountability as all stakeholders move forward together.

Our review makes 25 recommendations that provide the starting point for the City, TPS, and its partners to embark on this journey together.

Thank You

We would like to express our appreciation for the co-operation and assistance we received from the following groups in completing our review:

- Toronto Police Service
- Toronto Police Services Board
- Toronto Police Association
- City Manager's Office
- Municipal Licensing & Standards Division
- 3-1-1 Toronto
- Social Development, Finance & Administration Division
- Shelter, Support & Housing Administration Division
- Toronto Paramedic Services
- Toronto Community Housing Corporation

Background

TPS is the policing agency for the City of Toronto

The Toronto Police Service (TPS) delivers policing services in Toronto. Working in partnership with communities, TPS is responsible for:

- crime prevention;
- enforcing all applicable laws in Toronto including the *Criminal Code* (Canada), provincial offences, *Highway Traffic Act*, and City by-laws;
- providing assistance to victims of crime;
- community-based crime prevention initiatives;
- maintaining public order; and,
- providing emergency response to major threats and public safety risks.

Police Services Act & Upcoming Changes

The *Police Services Act* sets policing standards in Ontario

TPS is governed by the provincial *Police Services Act* which sets the standards for police services in Ontario. It gives police services boards the responsibility for providing adequate and effective policing services and identifies the core activities that police services must provide.

Changes to *Police Services Act* may impact how police services are delivered

In March 2019, the Government of Ontario passed the *Community Safety and Policing Act*. Once in force, it will replace the *Police Services Act* and is expected to impact what constitutes adequate and effective policing. Specifically, under section 14 of the *Community Safety and Policing Act*, police service boards will be able to enter into agreements with other police services or prescribed entities to provide certain policing functions allowed under legislation.

Regulations which are expected to clarify the new legislation, including the types of policing services functions allowed under section 14, have not yet been finalized. The *Community Safety and Policing Act* has not yet come into force and any changes from the current *Police Services Act* will be an important consideration in implementing the recommendations contained in this report.

TPS Governance

TPSB sets strategic direction and provides oversight to TPS

The Toronto Police Services Board (TPSB) oversees TPS and is responsible for ensuring the provision of adequate and effective police services in Toronto. TPSB works closely with the Chief of Police and senior leadership team to set the priorities and objectives and budget for TPS and provide governance and oversight through policies and other legally binding direction.

The Chief of Police administers TPS and oversees its operations in accordance with the objectives, priorities and policies established by TPSB and the *Police Services Act.*

Chief retains authority for day-to-day operational matters

While TPSB is responsible for directing the Chief and monitoring their performance, it cannot direct the Chief with respect to specific operational decisions or the day-to-day operation of TPS.

Staffing and Budget

TPS employs over 5K uniform and 2.5K civilian members

TPS has a staff complement of over 7,500 members, including almost 5,000 uniform police officers and over 2,500 civilian members. Almost all uniform and civilian employees of TPS are governed by collective bargaining agreements with the Toronto Police Association and the Toronto Police Senior Officers' Organization.

90% of TPS $1.1B budget is related to salary expenses

TPS's 2022 net operating budget is approximately $1.1 billion; representing an increase of 2.3 per cent over the City Council approved 2021 budget request. In 2021 and 2020, budget increases of approximately zero and 1.3 per cent respectively, were approved[22]. Salary related expenses represent approximately 90 per cent of total gross expenditures.

TPS has faced hiring moratoriums in the past

TPS has reported hiring moratoriums and reductions in hiring over the last several years. In its 2019 budget notes, management indicated that the Service had reduced over 300 positions since 2015 due to a hiring moratorium. In TPS's 2021 and 2022 budget notes, management reported that civilian staffing shortages in recent years, as a result of a previous hiring moratorium, have put significant pressure on the ability of staff to work on capital projects while continuing to perform their day-to-day duties.

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[22] Budget increases are calculated based on total gross expenditures as per TPS's budget notes. For the 2022 budget, management indicated that the financial impact of collective agreement settlements was the single largest component of the budget increase.

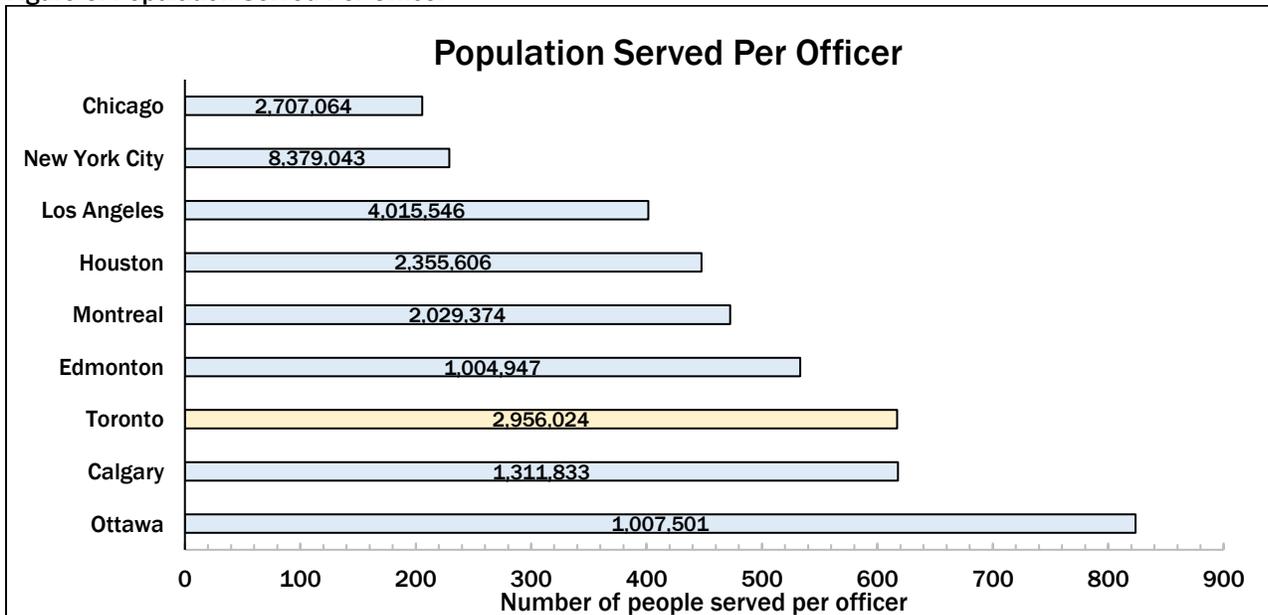| TPS budget does not include the Parking Enforcement Unit	TPS's budget does not include the Parking Enforcement Unit net operating budget which is presented separately for City Council approval and was approximately $50 million in 2022. There are almost 400 members working in TPS's Parking Enforcement Unit.
TPS budget one of the largest items of the City's overall budget	TPS's budget represents one of the single largest expenditure line items in the City's overall operating budget.
Toronto has a ratio of one uniform officer serving 617 people	As illustrated in Figure 6 below[23], in 2019, Toronto had a ratio of one uniform officer serving approximately 617 people. This number ranged from 200 to over 800 people for some other North American cities with populations greater than one million people. The lower the number of people served per uniform officer suggests a possible higher level of service from a resourcing perspective. Toronto's ratio was on the higher end for number of people served compared to these other jurisdictions.

It is important to note that police services can differ throughout regions of Canada and North America and there are a variety of factors that can influence their budgets and operating models, including the population served per officer, legal parameters, and geographic areas. |

Figure 6: Population Served Per Officer

Population Served Per Officer

City	Value
Chicago	2,707,064
New York City	8,379,043
Los Angeles	4,015,546
Houston	2,355,606
Montreal	2,029,374
Edmonton	1,004,947
Toronto	2,956,024
Calgary	1,311,833
Ottawa	1,007,501

Number of people served per officer

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[23] Based on information published by Statistics Canada (Municipal police services serving a population of 100,000 or more, Canada, 2019) and the Federal Bureau of Investigation (https://ucr.fbi.gov/crime-in-the-u.s/2019/crime-in-the-u.s.-2019/tables/table-78/table-78.xls/view) using 2018 and 2019 population data.

TPS Command Areas and Front-line Officers

TPS organized into four main commands

TPS is organized into four main command areas, which include Corporate Services, Information & Technology, Community Safety, and Specialized Operations.

The **Community Safety Command** includes the uniformed divisions of TPS[24]. These divisions are the front-line of TPS, making up the majority of TPS's uniformed officers. This includes:

- **Priority Response Unit (PRU) officers**; mainly responsible for responding to emergencies and other calls for service

- **Community Response Unit (CRU) officers**; who primarily work in communities to identify and assist in developing solutions to reduce crime and disorder and sometimes respond to calls for service[25]; and,

- **Neighbourhood Community Officers (NCOs)**; who are assigned to specific neighbourhoods and work in partnership with local residents and community-based organizations to address community safety and quality of life issues.

TPS also uses Mobile Crisis Intervention Teams (MCIT), which are a partnership between some hospitals and TPS. The program partners mental health nurses and trained police officers to respond to 9-1-1 emergency and police dispatch calls for service involving individuals in crisis. The nurse-police teams will assess needs and help the person in crisis get connected with community supports and other services.

As illustrated in
Figure 7, generally, PRU officers are more reactive, responding to emergencies and other calls for service. While the CRU officers have more autonomy, they still respond to events and service requirements across the city. By contrast, NCOs have more time for proactive activities, and are focused on building relationships and making connections and referrals within their neighbourhoods.

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[24] Apart from the different types of uniformed front-line officers listed above, TPS divisions also have investigative units/officers.

[25] Management reported that as of June 2022, most CRU officers have been redeployed primarily to expand the Neighbourhood Community Officer Program, and also to further support staffing challenges within the PRU.

Figure 7: Divisional Front-Line Officer Responses
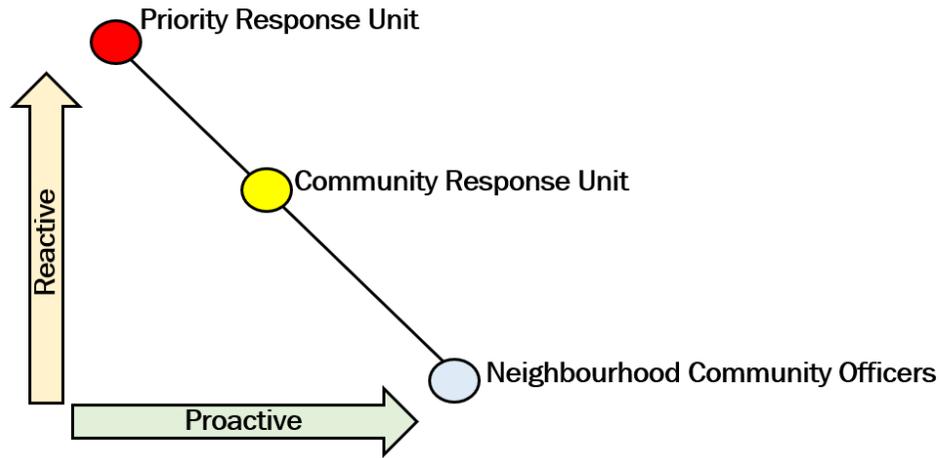
| **There are 16 TPS Divisions** | Uniformed officers perform their policing duties across 16 divisions, each representing a distinct geographical area of Toronto, as shown by the map below in Figure 8. Divisions are classified under two separate areas, West Field Command and East Field Command. |

Figure 8: TPS Division Map

Police Calls for Service

Calls for service are requests for police assistance

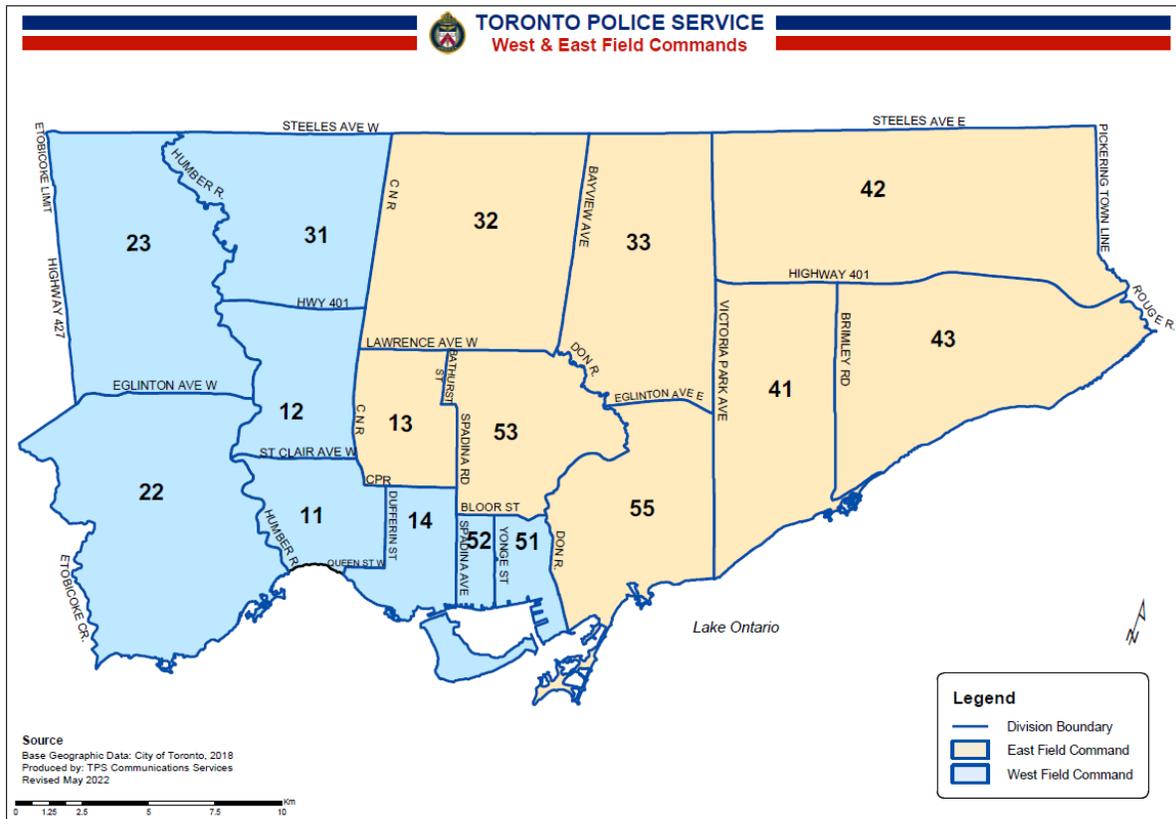Calls for service are requests from the public for police assistance. Generally, the public can request police assistance either by calling 9-1-1, TPS's non-emergency line (416-808-2222), using TPS's Citizen Online Report Entry (CORE) online reporting system for certain types of incidents, or by visiting their local police division in-person.

Calls for service are mainly received through TPS's Communications Services unit, with communications operators managing the call answering and dispatching functions relating to calls for service. Call takers record call for service details and assign resources using the call for service system (referred to as the I/CAD system). The workflow for a typical call for service for a 9-1-1 or non-emergency call, where police response is required, is illustrated in Figure 9 below.

Figure 9: Call for Service (CFS) Workflow for a Call Received at the Call Centre
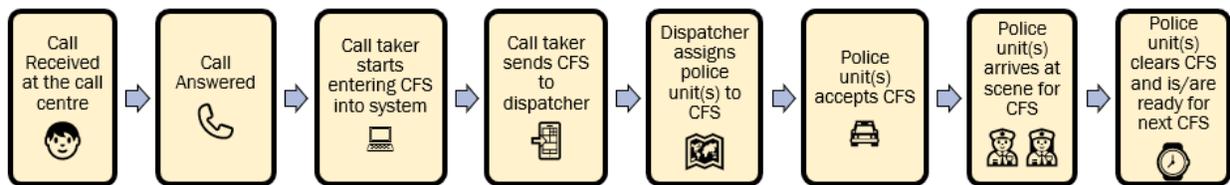
Calls for service can range from priority 1 to 6 based on the urgency of the call

Calls for service are categorized using event types, and each event type has a priority rating assigned to it to reflect the nature of the event. Priority ratings are assigned based on the event type and the circumstances that surround the event and are guidelines to help determine which event(s) to dispatch first.

TPS uses priority two, four and six as its default priority ratings for event types[26]. Communications operators can adjust the default priority rating of an event based on the circumstances of the situation using either priority one, three or five. Priority one is the most urgent rating and priority six is the least urgent rating.

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[26] The call for service system also includes default priority eight events that are mainly used as administrative event types. These are discussed further in Section B.1 of this report.

Call takers use their judgment to upgrade or downgrade a default priority rating

For example, a call taker may determine that a Suspicious Incident call for service, which is a default priority two event, needs to be downgraded to priority three or four, as there is no present or immediate danger. On the other hand, a call taker may determine that a Check Address call for service, which is a default priority four event, needs to be upgraded to priority one, if they learn that there may be a weapon or violence involved and there is an immediate risk to life.

As shown in Figure 10, priority one to three calls for service are generally treated as emergencies requiring immediate police attendance, while priority four to six calls for service are considered non-emergencies with no imminent danger or potential for harm. For these non-emergencies, PRU officers are assigned to attend when and if they become available.

Our review mainly focused on priority four to six calls for service

Our review focused mainly on priority four to six calls for service as more opportunities for alternative response may exist within certain event types for these lower priority, non-emergency calls for service. This is discussed in greater detail in Section A.1 of this report.

Figure 10: TPS's Definitions of Priority Ratings

	Priority Rating	TPS's Priority Rating Description	Examples	
Emergency	1	*Most urgent* situations that require upgrade from another priority. The dispatcher may assign the event to any unit from anywhere across the city. It is assigned to any call that poses a threat to life, limb, property, evidence or arrest.	**Default Priority 2** Shooting Stabbing Holdup Hostage Situation Robbery in progress Impaired Driver Break and enter, just occurred	**Mostly Out of Scope; Analytical Review Only** *except for See Ambulance calls[27]
	2	Events that require *immediate* police attendance and where the potential for danger and/or injury is present or imminent		
	3	Events which have been changed from the default priority based on the circumstances of the event		
Non-Emergency	4	Non-emergency situations where potential for *imminent* danger and/or injury is not a factor	**Default Priority 4** Check Address Unwanted Guest Dispute Noisy Party **Default Priority 6** Theft of Gas Property Damage Accident Lost Property Parking Complaint	**In-Scope for Detailed Review**
	5	Events which have been changed from the default priority based on the circumstances of the event		
	6	Non-emergency situations where potential for danger and/or injury is not a factor		

Calls for service increased 5.3% from 2017 to 2019

As part of its 2022 budget notes, TPS reported that in 2019[28] it received over 800,000 non-emergency and 1,130,000 emergency calls and that calls increased by 5.3 per cent from 2017 to 2019.

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[27] See Ambulance is an event type (default priority two) where paramedics request the assistance of police on medical related calls for service.

[28] The year 2019 was selected for illustration in some areas of our report given that it provides the most recent, normalized, full year of data. TPS reported that call for service data and response times in 2020 and 2021 may not accurately reflect the true state of operations due to the impacts of the COVID-19 pandemic.

Figure 11: Dispatched Calls for Service in 2019, By Priority
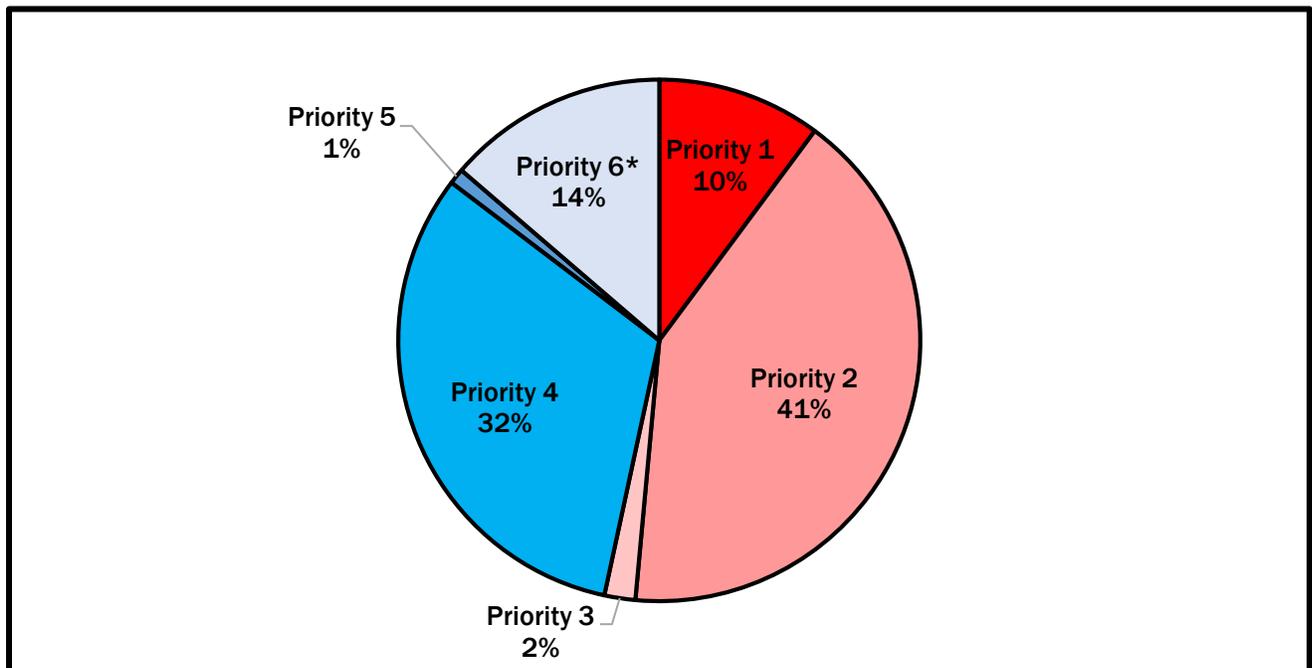
*Excludes some call for service event types, as per the note in the paragraph below

Almost half of dispatched calls for service were classified as priority 4 to 6 in 2019

Figure 11 above shows the breakdown of dispatched calls for service by priority in 2019 that would generally be attended by a PRU or another front-line officer. Approximately 53 per cent of calls for service were classified as priority one to three and approximately 47 per cent of calls for service were classified as priority four to six. The chart above excludes the following priority six event types:

- vehicle/subject stops and directed patrol events, as these are generally officer-initiated event types that do not result from calls for service;

- internet reporting and walk-in station report events, as these events are generally not handled by dispatching a front-line PRU officer unless follow-up is needed after the initial investigation; and,

- parking related events, as these events are handled separately by TPS's Parking Enforcement Unit and usually do not involve police officers.

The Auditor General has also conducted an audit of 9-1-1 PSAP operations

TPS's Communications Services unit and call-answering and dispatch functions are the topic of a related audit of TPS - 9-1-1 Public Safety Answering Point (PSAP) operations conducted by the Auditor General that is also being reported out at the same time as this report.

Overall capstone report considers key messages and themes	The Auditor General has also released an overall report entitled "*Key Common Themes: Toronto Police Service – Audit of 911 Operations & Review of Opportunities to Support More Effective Responses to Calls for Service*" that considers overall key messages and themes of both reports.

Past Reviews and Plans to Continuously Improve TPS

TPS has undergone several internal and external reviews over the last 10 years	TPS has undergone a number of internal and external reviews over the last ten years, many of them examining areas for improved efficiency and potential cost savings. The Auditor General's Office also conducted select audits and reviews of TPS from 1999 to 2011.
	In 2012, TPS began its own internal reviews, known as the Chief's Internal Organizational Review. This was a multi-year journey reviewing TPS administrative and business processes and service delivery, to find ways to deliver policing in a more fiscally responsible manner.
	In 2014, TPSB engaged a consultant to perform a review of the Chief's Internal Organizational Review, and to build upon the work that TPS had done to describe further potential options and opportunities for change. This work resulted in the report *Opportunities for the Future for the Board's Consideration*.
TPSB commissioned a Transformational Task Force to determine how best to modernize the structure and service delivery of TPS	Following this report, TPSB commissioned a task force (known as the Transformational Task Force) to review and study all of the reports issued over the last five years dealing with organizational change and potential efficiency measures to determine how best to modernize the structure and service delivery of TPS. The Transformational Task Force was also tasked with finding opportunities for TPS to deliver services more efficiently and effectively.
Action Plan: The Way Forward **was the result of the Task Force's work**	The result of the Transformational Task Force's work was *Action: Plan: The Way Forward ("Way Forward")*, an action plan aimed at creating a modernized, innovative, sustainable and affordable policing model. TPS has reported that many of the recommendations from the *Way Forward report* and other previous reviews have been implemented and have resulted in cost savings, including the increased use of civilians to perform responsibilities historically carried out by uniformed officers.
	Since the *Way Forward* report, there have been a number of other internal and external reviews of TPS, including an organizational culture assessment, and various public inquiries/inquests in areas including racial profiling and discrimination, use of force, and missing persons investigations. During this same time, TPS has also released a number of strategies, including a race-based data collection strategy and people plans that look at how TPS supports and manages its members.

Public Call for Transformative Change to Policing

High profile events put pressure on transforming policing

In 2020, there were high-profile events and protests in the United States and Canada related to policing and the community safety response for marginalized individuals and communities. With these events came public pressure to transform policing services and to review police funding.

In a letter to City Council dated June 23, 2020, Mayor John Tory referenced the, "*the tens of thousands of Torontonians who have called and e-mailed [his] office and the offices of [his] Council colleagues over the past few weeks*," and that "*many of you have raised the issue of policing, and there have been calls to de-fund the police*"[29].

City Council's response through 36 decisions in June 2020

In response, City Council adopted 36 decisions in June 2020 related to areas including public safety, crisis response and police accountability, which included a direction to the City Manager to work with TPS and other stakeholders to develop alternative models of community safety response[30].

TPSB's response through 81 recommendations on policing reform

Similarly, at its meeting in August 2020, TPSB approved 81 recommendations[31] on policing reform which incorporated City Council's motions. Recommendation 1a directed the Executive Director, TPSB Office to work with TPS, the City Manager, and other stakeholders to identify the categories of calls that might be addressed by a non-police response.

This review examines whether TPS is using its existing policing resources in the most efficient and effective manner possible

This review examines whether TPS is using its existing policing resources in the most efficient and effective manner possible to achieve its mandate under the *Police Service Act*, providing the most value-added services for the people of Toronto, and maximizing outcomes that can be achieved for the City as a whole.

The work we describe in this report was not an audit

The work performed in relation to this report does not constitute an audit conducted in accordance with Generally Accepted Government Auditing Standards. However, we believe we have performed sufficient work and gathered sufficient appropriate evidence to provide for a reasonable basis to support our observations and recommendations.

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[29] Changes to Policing in Toronto - Letter from John Tory

[30] City Council 36 Decisions, June 2020

[31] TPSB 81 Recommendations, August 2020

Results

A. Re-thinking Call for Service Response to Support More Efficient and Effective Outcomes

TPS plays a key role in ensuring the safety and well-being of the people of Toronto

Toronto Police Service (TPS) plays a key role in ensuring the safety and well-being of the people of Toronto through its delivery of policing services. As first responders, TPS officers are on the front lines and respond to a variety of situations. However, a Priority Response Unit (PRU) police response is not intended to and cannot always resolve the complex needs of some vulnerable people, such as those experiencing homelessness or mental health challenges.

PRU officers may be dispatched to respond to a variety of call for service, including all priority levels

PRU officers are TPS front-line officers who are mainly responsible for responding to emergencies and other calls for service. The PRU represents a large part of TPS resources and is a model of policing that has been in place for many years.

PRU officers may be dispatched to respond to a variety of calls for service – from high priority events such as shootings, to non-emergencies such as by-law issues. Once on site, officers are generally responsible for resolving the call for service in its entirety – from controlling immediate safety concerns to evidence collection, taking notes, and preparing reports, although they may be assisted by other TPS members.

Not all calls for service that PRU officers respond to require an immediate police response

In the 2017 report, *Action Plan: The Way Forward ("Way Forward")*, TPS reported that many of the calls for service its Communications Services unit receives involve "*situations where a police response was requested but not strictly necessary.*"

TPS has effectively become a default response for some situations

As illustrated in Figure 12, PRU officers have effectively become the default response for providing assistance in some situations, due to a number of reasons. Individuals we interviewed during our review, including members of TPS, the Toronto Police Association and City staff, were aligned with this view about the lack of alternative responses.

Figure 12: What Has Been Happening

What has been happening?

Timely response not always available

Historical/cultural practices

Public Expectations

Insufficient social supports

Lack of public awareness

PRU have needed to respond

What has been the result?

- Longer emergency event response times

- Limited resources to staff strategic priorities

- When PRU officers are on lower priority non-emergency calls, this delays their response to emergencies

TPS noted these challenges in the *Way Forward* report	In the *Way Forward* report, TPS noted that "...*For some of these situations, a police response makes sense because of risk or the presence of potential danger. **In other situations, however, people call the police because they think they are supposed to, or they don't know who else to call. It can also be because the appropriate City department is unable to respond as quickly or doesn't provide an after-hours service."*** We found some of the same findings in this project, particularly through the results of our sample review.
Some members of the public expect that police are available to respond 24/7 for non-emergency calls for service	Historically, for some people, contacting the police has been their "go-to response" for assistance and they have the expectation that police will respond to their call, whether it is an emergency or not. The 9-1-1 emergency number is a toll-free phone number, is brief, easily remembered and can be dialed quickly. PRU officers are available to respond to calls for service 24 hours a day, seven days a week, anywhere in Toronto.
Lack of public awareness on who to call for non-emergencies	However, the public are not always contacting TPS for emergencies and this is sometimes impacting police resourcing and the ability of police to respond in a timely way to higher priority, emergency calls for service. In some cases, the public may need increased education and awareness on who they can call, e.g. 3-1-1 for information on City services. In other cases, we found the public may first call another number, such as 3-1-1, and if they don't receive the timely response they would like, they contact TPS.

No one else available to respond	And finally, there are some areas of need where there may not be an alternative available, at the times needed, to address some non-police matters. If there is no one else available to respond, some members of the public expect the police to respond.
Insufficient social supports including underinvestment in mental health supports in Canada	There are also often insufficient social supports in place for people, including support for people with mental health challenges. Underinvestment in mental health resources in Canada has also meant that people with mental health challenges may not always receive the supports they need[32]. This sometimes results in police officers becoming the default first responders in some situations involving those in crisis. Over the past five years, TPS has seen an increase in person in crisis calls for service.
Historical/cultural practices of TPS focus on providing service to help people	In a meeting with TPS, we heard that some members of TPS may see a big part of their job as "helping people", and not just "fighting crime". In 2018, an organizational cultural assessment performed by an external consultant showed that TPS leaders and members shared a common sense of the importance of being service focused and that "customer focus" scored the highest of all the behaviour indicators assessed.

This customer focused culture may partly explain why police have sometimes responded to calls for service outside of the scope of their mandate.

<u>What has been the impact?</u> |
| **Responding to non-police matters impacts response times for higher priority calls** | As shown in Figure 12, the impact of using police as the default response for some situations has created constraints for TPS which has also impacted the City as a whole. When PRU officers are tied up attending non-police or lower priority, non-emergency matters, this can delay their ability to address pending higher priority calls for service in a timely manner.

PRU officers are first responders, and their primary function is to attend emergencies and other situations where prompt attendance by someone with the training and authority of a police officer is essential. |

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[32] In the "*Changing Directions, Changing Lives: The Mental Health Strategy of Canada*" report, the Mental Health Commission of Canada indicates that "...*given the historical neglect of the mental health sector, the Strategy recognizes the need to invest more so that mental health outcomes can be improved.*" and that "*...in any given year, one in five people in Canada experiences a mental health problem or illness, with a cost to the economy of well in excess of $50 billion*" (Link to Changing Directions, Changing Lives report)

A PRU police emergency response is not intended to and cannot address the complex needs of some vulnerable people

A PRU police emergency response is not intended to and cannot resolve the complex needs of some vulnerable people, such as those experiencing homelessness or mental health challenges. PRU officers may not always be the most appropriate response to these types of calls, and a community-based response may help provide better outcomes for people.

TPS highlighted these challenges in the *Way Forward*

TPS highlighted these challenges in the *Way Forward* noting that, "...*These non-emergency situations often involve considerable delays for residents before an officer can be dispatched. While on this type of call, officers are not available to respond to emergency calls.*"

These issues are explored in greater detail in the following sections of this report.

City, TPS and other partners must continue to work together

In a city with almost 3 million people, demand for police resources is high. As response times increase and the Service faces budget constraints, TPS must determine the most efficient and effective allocation and use of its front-line resources. At the same time, the City, TPS and other partners must continue to work together to provide alternative call for service responses that provide the best possible outcomes for the people of Toronto, especially for those who are most vulnerable.

A. 1. Is a Response by Priority Response Unit Police Officers Always Essential?

We reviewed over 300 dispatched calls for service

In total we reviewed over 300 dispatched calls for service from January 2018 to July 2021, to assess if an on-scene, PRU response was essential, or if the event could potentially have been addressed by a non-PRU police response[33], or alternative non-police response.

We wanted to see a range of what was happening on calls for service, particularly for the lower priority four to six, non-emergency event types. Our initial sample focused on select event types, which could potentially be handled by a non-PRU police response, or alternative non-police response.

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[33] TPS already has several different units that provide alternative police responses. These are discussed in greater detail later in this report.

We excluded most higher priority one to three emergency event types (except for See Ambulance calls for service classified as default priority two and discussed later in this report) since many of these events are likely to require a police response[34]. These events include situations such as shootings, assaults in progress, break and enter in progress, etc., which are calls for service that involve or could involve imminent danger.

We focused on 6 event types that may be suitable for an alternative response

From our initial sample, we identified six event types[35], illustrated in Figure 13, as having the greatest opportunity for a non-PRU response and expanded our sample to focus on those items[36]. We have used these six event types (all default priority four) as a window to see what is possible, but there may be other event types that have potential for alternative responses.

40% of the calls for service we reviewed across six lower priority event types could possibly have been handled by an alternative response

In approximately 40 per cent[37] of the calls for service for these six event types across lower priority calls that were included in our sample, the circumstances of the call for service based on the situation at the time of dispatch suggested that on-scene PRU attendance may not have been essential, and that a non-PRU police response, or alternative non-police response may have been able to handle the event. Our conclusions were informed in consultation with a panel of experts that included former law enforcement officers.

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[34] Although this report includes issues regarding mental health, our project did not start with a mental health focus and therefore, we did not review calls for service classified by TPS using mental health event types (e.g. "Persons in Crisis", "Threatening Suicide", etc.). While these calls for service are classified as priority one to three, not all of these calls may require a police response. Response to mental health calls is a separate area listed on the Auditor General's Proposed Risk-Based Audit Plan of TPS and may be addressed as part of a future audit (Link to AG's Risk Based Audit Plan of TPS).

[35] Apart from the criteria mentioned above, our sample population only included calls for service where at least one PRU unit was dispatched and excluded certain events. For example, we excluded those events that resulted in an apprehension/arrest, charges laid or pending, events assigned to the Parking Enforcement Unit group, events initiated by officers, events where individuals requested assistance in-person at divisions, and events assigned to TPS's alternate response unit groups.

[36] We used a statistically valid and randomly selected sample, using a 90 per cent confidence level and 15 per cent margin of error.

[37] Total percentage is based only on the six event types, as outlined in Figure 13, for the items that were included in our sample.

Figure 13: Six Event Types Reviewed

| Check Address | Check Well-Being | Unwanted Guest | Dispute | Landlord & Tenant Dispute | Noisy Parties |
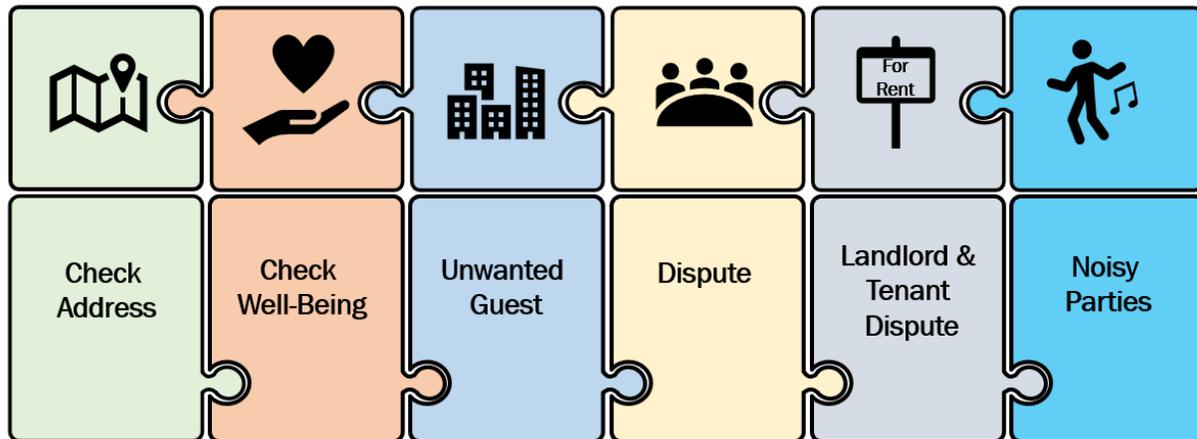
Criteria we used in assessing whether an alternative response may be suitable

In assessing whether an alternative response (either police or non-police) may be suitable in the calls for service we reviewed, we considered the following questions:

- Were there any legislative requirements (e.g. *Police Services Act*) which would require a police response (e.g. an arrest or investigation may be required)?

- Was an on-scene PRU response required, or could the event have been addressed remotely?

- Was there a risk of imminent danger, violence or weapons?

- Did the call for service require an immediate response, or would a delayed response have been acceptable?

- Was the attendance of a PRU officer likely to address the root cause of the issue and result in the most effective outcomes for the individuals involved?

- Based on the circumstances of the call for service, was there any group (that either currently exists or could exist in the future) that could have attended as an alternative response and resolve the event?

Many calls for service will still require a PRU police response

Many of the calls for service in the event type categories we reviewed would still likely require a PRU police response. We also recognize that many calls for service have the potential for danger, including those that originate as low priority, non-emergency calls.

Police have a duty and authority to investigate certain types of calls and the *Police Services Act* also requires that police services must respond to emergency calls for service 24 hours a day. These requirements should be considered before any future changes are implemented.

However, there is the potential for some of the calls for service to be handled differently, if an effective and timely alternative response is available.

Examined 6 event types (default priority 4) and found an on-scene PRU response may not always be essential in some cases

The section below outlines our findings relating to these six event types, where an on-scene PRU response may not always be essential, and either a non-PRU police or non-police alternative response, if it exists or is developed, could sometimes handle the event.

Developing effective and timely alternative responses will be a longer-term journey

Developing effective and timely alternative responses will not happen overnight. It will be a longer-term journey with TPS and the City and other agencies working together, to establish or improve non-police alternative responses for the City, in order to build better outcomes together. Non-police alternative responses are further discussed in the section below related to the above six event types.

Identified areas for TPS to continue to improve its alternative police responses

There are also some alternative police responses to PRU officers described in the next section that TPS may be able to use to free up PRU officer time. We have findings in that section for TPS to continue to improve these alternative police responses.

This journey will require all levels of government working together to obtain the funding needed. Also, if the alternative responses are not effective, timely, and widely used by the public, it is possible that the PRU will still be called and required to respond.

Examined See Ambulance calls for service (default priority 2) and found protocol can be improved

We also examined the See Ambulance event type (default priority two) where paramedics request the assistance of police on medical related calls for service. We have findings below for the two entities to improve their protocols in working together, and this may decrease the volume of calls for service where police assistance is requested.

Findings from Six Event Types

1. Check Address

Check Address events are used as a "catch-all" event type	Check Address events are considered a "catch-all" event type, and can be used in a variety of instances, including to check an address in relation to a police investigation, for a missing person, to check on someone's well-being, and other reasons. Check Address events are also used in certain situations where TPS receives a 9-1-1 call where the caller is not responding or there are no audible sounds and the call taker cannot make voice contact with the caller.
We identified calls for service involving persons experiencing homelessness and mental health challenges	Of the Check Address calls for service we reviewed, some examples[38] of situations we noted included:

- persons possibly experiencing homelessness and/or mental health challenges;

- requests for PRU officers to perform searches for stolen vehicles; and,

- a condo security guard requested police attendance in relation to a matter involving the execution of a will.

PRU attendance was not intended to and can't resolve the complex needs of some vulnerable people	In some of these situations, a PRU response is not intended to and can't resolve the complex needs of some vulnerable people, such as those experiencing mental health challenges, or provide the supports that the individuals involved may have required.

In addition, some of the functions PRU officers were asked to perform, such as searching for stolen vehicles, could possibly be performed by police alternative response units, freeing up the PRU to respond to higher priority calls for service. |

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[38] The examples we highlight in this section are based on our sample review only. The nature of calls for service in each category can vary from event to event.

Example: Someone Passed Out in a Public Transit Bus Shelter
Caller indicated that they were concerned about an individual who had been passed out in a public transit bus shelter for about an hour in the same position.
There was no indication of criminality mentioned by the caller, and the individual was no longer at the scene when the police arrived.
If there was information provided that suggested the person was experiencing homelessness, the call for service may have been more suitable for a homeless outreach initiative to provide the proper support to the individual, if needed.

2. Check Well-Being

Public request police to check on the well-being of family and friends and other individuals

Check Well-Being events involve requests for police to attend a requested address to check on the condition or well-being of a person who they have not seen or heard from for a length of time. These requests typically arise when a family member or other concerned party has been unable to get in touch with an individual and they are concerned for that individual's well-being.

Check Well-Being events can also arise when call takers receive calls from individuals and are concerned about their mental health or well-being based on the nature of the call and the information relayed by the caller. For example, if the call taker feels the person may be in crisis.

Of the Check Well-Being calls for service we reviewed, some examples of situations we noted included:

- requests from individuals, some of which did not reside in Toronto, to check on the well-being of family members living in Toronto that they had not heard from for a period of time;

- persons possibly experiencing mental health challenges;

- requests from school officials asking TPS to check on the well-being of students that they had been unable to get in contact with; and,

- a request from a healthcare provider for police to visit an elderly patient with dementia who had missed a scheduled health appointment.

Alternative responses may have been able to handle some of these calls

In many of the situations we reviewed there was no articulable immediate safety concern, or risk of danger. The main function of the PRU was to contact the individuals or attend their residence and confirm their well-being.

We recognize that each call for service is different and there will still be Check Well-Being calls for service that are high risk and that will require police involvement. However, in the cases we looked at, we believe there are opportunities for certain calls to be carried out by alternative non-PRU police responses or a non-police response.

> **Example: Caller Wants Police to Check on His Family Member Who Won't Pick Up His Calls**
>
> A caller from outside Toronto wanted police to check on a family member living in Toronto who had not responded to his calls for two weeks. The caller mentioned wanting the family member to call him every day, and the call taker advised that police could not force the family member to return his calls. Ultimately an officer attended the family member's residence and the family member advised the responding officers that he would contact the caller later.

3. Unwanted Guest

Public can call police to assist with unwelcome persons

Unwanted Guest events involve requests from individuals and businesses for police to remove someone from a property because that person is no longer welcome but continues to stay at a location against the wishes of the property owner or agent.

Many calls for service involved persons experiencing homelessness and likely in need of supports

Many of the Unwanted Guest calls for service in our sample where we determined that PRU attendance was not essential involved persons possibly experiencing homelessness and/or mental health challenges. These calls for service did not appear to involve violence, or the risk of danger. The main function of the PRU in these cases included informing the individual that they could not remain at the location and ensuring that they departed, but police attendance was unlikely to resolve the root cause that may have prompted the call, such as the need for adequate shelter or other support services.

> **Example: Persons Possibly Experiencing Homelessness at Gas Station**
>
> A staff person at a gas station called police about two individuals who appeared to be experiencing homelessness and were panhandling in front of their business, holding the door open for customers. There were no signs of aggression or violence. PRU officers arrived and asked the individuals to leave.

4. Dispute

Dispute events involve verbal disagreements between two or more parties

Dispute events involve verbal disagreements. Officers are generally dispatched if both parties are on-scene and the dispute is occurring at the time of the call and there are aggravating circumstances (such as the risk for the dispute to escalate).

TPS procedures indicate that if there are no aggravating circumstances, and where the dispute is in relation to situations such as shared mutual driveways, property line issues, etc., and there are no criminal aspects or actual danger/threat to either party, call takers should refer the call for service to 3-1-1 Toronto, the phone number used to access non-emergency City information and services.

Dispute events that involve a physical altercation where weapons are involved, or injuries have occurred are assigned a higher priority rating and generally receive a more immediate police response.

We identified disagreements between family members neighbours, and others

Of the Dispute calls for service we reviewed in our sample, examples of situations we identified included disagreements between:

- parents and children;
- neighbours, residents/tenants living in close proximity; and,
- individuals and businesses, regarding service disputes (e.g. moving services)

PRU mainly acted in a mediation and de-escalation role

In some cases, the dispute did not appear to be active at the time of the call for service and/or there was no indication of risk of danger to others, or the need for an immediate response.

The main function of the PRU in these cases was to act in a mediation role and de-escalate – functions which could potentially be performed by an alternative response or through a referral to community resources.

Example: PRU Officers Resolve Family Disagreement

A teenager called police to report that there is a family dispute and his parents always demotivate him and that the individual could hear his parents talking "badly about him". PRU officers spent time counselling both the parents and the teenager.

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5. Landlord & Tenant Dispute

Landlords and tenants call police to resolve disputes

TPS also has a specific event type to address disputes that arise between landlords and tenants. Similar to the Dispute event type described above, police are generally dispatched to Landlord & Tenant Dispute events if both parties are on scene and the situation involves a breach of the peace. TPS procedure instructs call takers to refer callers to the Ontario Landlord and Tenant Board for advice where applicable, or to 3-1-1 Toronto for situations such as where there is inadequate or no heat in a residential unit.

Of the Landlord & Tenant Dispute calls for service we reviewed, examples of situations we identified included:

- tenants requesting police assistance because they were in the process of or had been evicted;

- landlords asking for police assistance to remove tenants from their properties; and,

- disagreements between landlords and tenants regarding damaged property and accusations of theft.

PRU mainly acted in a mediation and de-escalation role

In some cases, the dispute was not active at the time of the call for service and/or there was no indication of risk of danger/harm to others, or that an immediate response was required. Further, some of the concerns raised by the callers related to issues where police may not have jurisdiction to enact an effective resolution, such as addressing tenant evictions.

The main functions of the PRU in these cases was to act in a mediation role, de-escalate disagreements, and provide information on landlord and tenant processes – functions which could be performed by a trained community resolution function or a referral to the provincial Landlord and Tenant Board.

Provincial agency has jurisdiction

The Landlord and Tenant Board is the provincial tribunal created by the *Residential Tenancies Act* and can resolve disputes between landlords and tenants and provide them with information about their rights and responsibilities under the *Residential Tenancies Act*.

These types of events can sometimes tie up PRU for long periods of time

Although the responding police officers are helping these people and acting as mediators (and in some cases potentially preventing escalation and future calls for service for active disputes), there may be more cost-effective alternatives than sending uniformed police personnel. These types of calls for service can sometimes take a significant amount of time to clear, during which time officers are generally not available to respond to higher priority calls for service.

6. Noisy Parties

Noisy Party events involve complaints about excessive noise related to parties.

PRU sometimes attend events to ask people to cease making noise or find the noise has already stopped

In some Noisy Party calls for service, the main complaint related to amplified or unreasonable noise associated with a gathering, and we did not note any violence or weapons. However, the PRU were dispatched and attended to ask the individuals at the call for service address to cease making noise. In other instances, when police arrived on scene, they noted that they could not hear any noise.

Toronto Municipal Code, Chapter 591 is the City's by-law on noise. While there is no specific "party noise" definition, the by-law includes prohibitions on continuous amplified sound above a certain decibel level, such as music from a loudspeaker, and unreasonable noise, which is defined as any noise that would disturb the peace, rest, enjoyment, comfort or convenience of a reasonable person in the circumstances.

MLS Division has dedicated noise teams

The City's Municipal Licensing and Standards (MLS) division has dedicated noise teams that investigate noise complaints received under the City's noise by-laws. There are currently 18 by-law enforcement officers assigned to noise teams. The teams have coverage 10 hours a day from 4:15 pm to 2 am every day, and coverage 20 hours a day (6 am to 2 am), four days a week. The four days of the week that have 20-hour coverage fluctuates, based on complaint data and seasonal patterns.

MLS does not respond to noisy party complaints

In 2018, as part of the recommendations in the *Way Forward* report, TPS and MLS reviewed response protocols related to different types of noise complaints and established that TPS would continue to respond to any calls for service related to noisy parties, even if the caller does not suggest the potential for violence. MLS responds to most other types of noise complaints, including construction and mechanical noise, unless a criminal element is present.

MLS management indicated that for the health and safety of by-law enforcement officers, noise teams do not respond to demonstrations, noisy parties, or noise from people acting disorderly. Residents and community members calling 3-1-1 Toronto for noisy party complaints will generally be directed to contact TPS.

MLS investigates certain situations for noisy party complaints received through 3-1-1 Toronto

However, MLS noise teams will still investigate noisy party complaints received through 3-1-1 Toronto in certain situations (e.g. repeated instances of unreasonable and persistent /amplified noise from the same address). It seems reasonable for the City to consider whether MLS could respond to certain gatherings where noise is an issue as identified through our sample review, instead of PRU officers.

MLS response time can range from 24 hours to 5 days

The operational model used by the MLS is not for emergency response, so in these cases, by-law officers are not immediately dispatched and do not respond to noisy parties as they are occurring. Response times can range from within 24 hours for urgent matters to up to five days for non-urgent matters.

MLS by-law officers will not immediately stop noise events

Also, the by-law officers do not attend to stop the noise event. If there is a possible noise by-law violation, by-law officers will measure the noise and may educate, refer to mediation, and/or take by-law enforcement action.

PRU time better spent on high priority calls

PRU officers have special skills that are most effectively used for the activities they are trained for; using their time to routinely address noise by-law issues is not an effective and efficient use of their time.

PRU can find noisy party calls for service "gone-on-arrival"

Also, due to the timing of the calls for service and the fact that they are assigned a lower priority, officers may not arrive until much later after the call was originally received by TPS. Noisy parties have a default Priority 4 rating. The average response time for Priority 4 calls for service in 2019 was just over two hours (120.3 minutes). When there are many higher priority calls at the same time the noisy party calls are often received, the response time can be much longer. Given that in some instances callers do not call back to cancel these calls for service, this results in an inefficient use of PRU time, as officers generally must still attend active calls for service that have not been cancelled. These are referred to as "gone on arrival" situations.

If MLS were to respond to these events on a consistently timely basis, it would likely require a change to their model and resourcing. It would also require an assessment of the cost effectiveness of an "on-demand" model and an evaluation of the risks that may be involved in sending by-law officers to resolve these calls for service.

Example: Caller Wants PRU to Respond Because Their Baby Can't Sleep Due to Noise
A caller mentioned that there was too much noise coming from a neighbouring residence and it was waking up their baby. The caller mentioned that this has been happening every week. Officers arrived at the call for service and marked the incident as "gone on arrival".

Exploring Non-PRU Alternatives

TPS could save at least 85K hours of PRU hour time over a projected 5-year period

Based on average time-on-call for the event types above, we estimate that TPS could potentially save at least 85,000 hours over a projected five-year period[39] if even some of these calls for service received a non-PRU response.

Other event types may exist

While we have focused on six lower priority event types where we feel the greatest opportunity for alternative responses exist, there may also be opportunities within other suitable event types that should also be considered. Identifying these situations will likely require improved data, discussed in Section B of this report.

This savings in time could be used to improve TPS call for service response times, particularly for priority one to three events where there can be a risk of danger to life or damage to property.

TPS and TPSB have been pursuing alternative strategies

TPS and TPSB have noted that freeing up PRU time so that they can readily respond to emergencies is a strategic priority. In the *Way Forward* report, TPS noted that in the future, *"...the focus will be on sending officers to emergencies and other situations where prompt attendance by someone with the training and authority of a police officer is essential. With this shift in emphasis, Priority Response will be more focused on keeping residents safe in critical situations."*

This approach also aligns with the 81 recommendations approved by TPSB in August 2020 which included directing the Executive Director, TSPB Office, to work with TPS, the City Manager, and other stakeholders to identify the categories of calls that might be addressed by a non-police response.

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[39] Based on our sample population which was less than and can't be extrapolated to the full population of TPS priority four calls for service as shown in Figure 11 of this report. Also, the estimated hours are based on average time spent on calls for service for PRU units, based on our sample population. The term "unit" refers to the officers that attended the call for service together and are using the same identifier. For example, there may be two officers in one vehicle attending the same event, and those officers are collectively referred to as a unit. However, a unit may also be composed of a single officer. As a result, these numbers are likely conservative.

TPS strategic priorities

TPS and TPSB have indicated that there are a number of strategic areas that are high priorities for TPS to address, however, given limited resources, management has had to defer or limit forward movement on these areas. These include:

- further expansion of the Neighbourhood Community Officer program;
- gun-related crime reduction;
- enhancing missing persons investigations;
- preventing, responding to and investigating:
  - child exploitation
  - intimate partner violence
  - fraud, particularly involving people who are vulnerable;
- investment in automation and digital solutions to improve efficiencies and customer experience; and
- enhancing the current records management system.

Savings in PRU time through diverting calls for service to alternative responses could be used to improve TPS call for service response times and/or to address some of TPS's strategic priorities.

Exploring non-police alternative responses that are able to provide wrap-around and community-based supports could also help promote better outcomes for vulnerable populations within the city, especially those experiencing homelessness and mental health challenges.

<u>Key Considerations</u>

Building the infrastructure needed to support non-police alternative call for service response will require innovation, and a well-thought out plan that is adequately resourced, that the City will need to lead and implement in collaboration with TPS and other stakeholders.

A gradual or phased approach where certain calls for service are slowly transitioned will likely be needed. As illustrated in Figure 14, it will be a longer-term journey with TPS and the City and other agencies working together, to establish or improve non-police alternative responses for the City, in order to build better outcomes together.

Realizing savings in PRU officer hours is contingent on availability of adequate and timely alternative response

While realizing these savings in PRU officer hours would likely result in positive impacts for TPS and the people of Toronto, the extent of these impacts is contingent on adequately resourced alternative responses that are available city-wide, 24 hours a day, seven days a week. In most cases, these alternatives do not exist today and largely fall outside the purview of TPS to control. If effective alternatives are not established, it is very likely that PRU officers will need to continue responding to these calls for service.

TPS management also indicated that each call for service is unique and even calls for service that originate as non-emergency calls have the potential to escalate, become dangerous and may require police involvement. In establishing alternative responses, consideration will need to be given to ensuring the safety of the responding agencies and managing the risk and liability that may be involved.

Consideration will also need to be given to the cost-effectiveness of any potential alternative responses, with a focus on achieving both desired outcomes and value for money.

Consultation with the people of Toronto will also be important to ensure transparency and that members of the public are able to have a stake in the process.

Figure 14: A Journey Towards Change is Needed
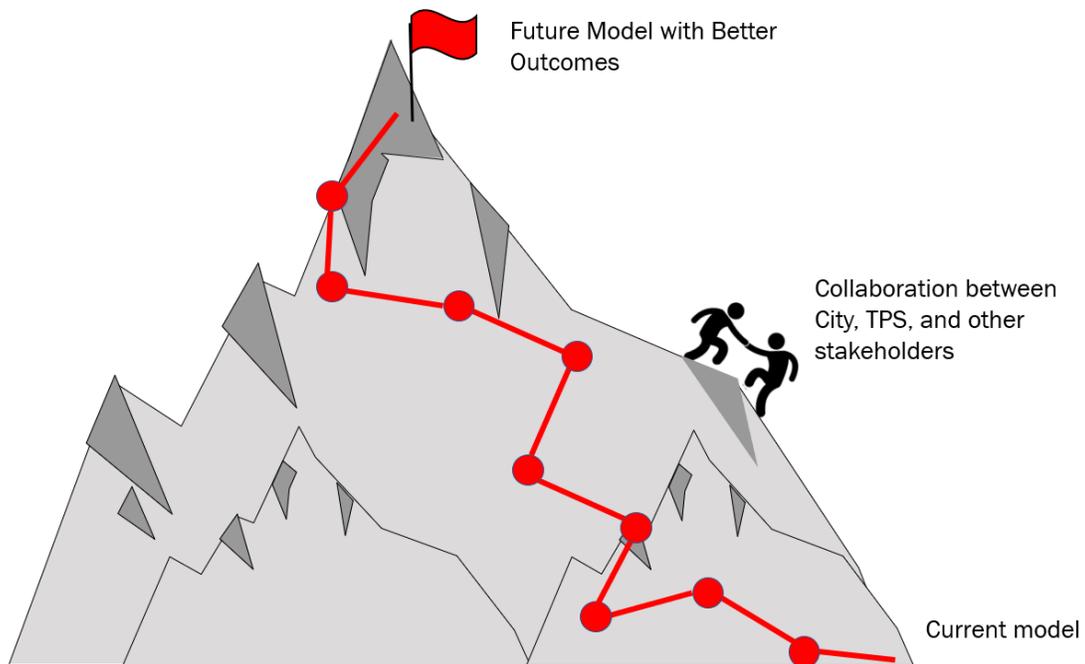
Addressing the Root Causes

Alternative response models must address underlying root causes to be effective	In order to be effective, any alternative response models developed must help address the underlying root causes that persons experiencing homelessness and/or mental health challenges face. People experiencing homelessness and mental health challenges can sometimes have significant care needs and may face challenges in accessing community and health supports.

In the 2021 update to TPS's *Mental Health and Addictions Strategy* it mentions that *"...TPS remains engaged in work on a number of progressive initiatives **that emphasize collaboration with community partners with the intent of connecting people experiencing mental health and/or addictions issues with the resources and supports that they require."*** |
| **Support from other governments is needed** | These are complex social issues which will require support and funding from the federal and provincial governments, however historically, support in these areas has not been very well funded.

<u>Mental Health</u>

In the *"Changing Directions, Changing Lives: The Mental Health Strategy of Canada"* report, the Mental Health Commission of Canada (MHCC) indicates that *"...given the historical neglect of the mental health sector, the Strategy recognizes the need to invest more so that mental health outcomes can be improved*[40]." |
| **1 in 5 people in Canada experience a mental health problem or illness** | In 2012, the MHCC reported that in any given year, one in five people in Canada experiences a mental health problem or illness, with a cost to the economy of well in excess of $50 billion. In Ontario, mental health challenges have likely further increased as a result of the COVID-19 pandemic[41]. |
| **Public spending on mental health in Canada is only 7%; below the 10-11% in some other countries** | And yet, in *Changing Directions, Changing Lives,* the MHCC reported that Canada spends considerably less on mental health than several comparable countries with only about 7 per cent of public health care spending going towards mental health, far below the 10 to 11 per cent of public health spending devoted to mental health in some other countries such as New Zealand and the United Kingdom. |

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[40] [Link to Changing Directions, Changing Lives report](#)

[41] According to public polling commissioned by the Canadian Mental Health Association (CMHA), Ontario Division. In 2021, the CMHA reported that its latest polling data shows that only a third of Ontarians (35 per cent) consider their current state of mental health as "very good" or "excellent", a significant decrease from 52 per cent as recorded in its first poll in May 2020 ([Link to CMHA poll results](#)).

Many people experiencing homelessness in Canada report having mental health challenges

It is not uncommon for people who are experiencing homelessness to also have mental health and/or addiction challenges. The MHCC reported that between 23 and 74 per cent of people experiencing homelessness in Canada report having a mental health problem or illness.

Vulnerable populations are more likely to have interactions with police

People experiencing homelessness and/or facing mental health challenges are more likely to have interactions with police, compared to the general population, especially if not housed[42].

Providing housing with supports helps people recover and saves money in the long-term

There is strong evidence that improved housing helps people to do much better in recovery. The MHCC stated that recovery is not possible without *"the fundamental elements of community to which [everyone] should have access: housing, education, income, and work... There is strong evidence that improved housing helps people to do much better in recovery. Providing housing with supports saves money in comparison to inaction, which shifts the cost burden to acute care and the justice systems*[43].

Whole-of-Government Approach Needed

City Council has recognized the need for increased social services supports

City Council has recognized the need for increased social services supports, and has adopted motions that include calling on the provincial and federal governments to better support these challenges Toronto is facing, including:

- In 2019, Council passed a motion[44] to request the Federal Government to provide $300 million annually to address Toronto's mental health and addictions crises, and scale up evidence-based, community-oriented mental health services, and an additional $600 million annually to help build 18,000 new supportive housing units over 10 years.

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[42] Canadian Journal of Psychiatry paper titled "*Interactions between Police and Persons Who Experience Homelessness and Mental Illness in Toronto, Canada: Findings from a Prospective Study*" concluded that "*for people who experience homelessness and mental illness in Toronto, Canada, interactions with police are common*" Link to Interactions between Police and Persons Who Experience Homelessness and Mental Illness in Toronto, Canada: Findings from a Prospective Study.

[43] The Auditor General's report *Part 1 of the Audit of Emergency Shelters: A Focus on Case Management Improving Outcomes* also notes that "pivot to housing" requires a shift from an overreliance on emergency responses towards longer term housing solutions and that the City should continue to look for ways to accelerate the "pivot to housing" and increase the stock of affordable permanent housing options.

[44] Link to Council Decision

- In 2021, City Council requested[45] the Medical Officer of Health, in consultation with the City Manager, to:

  - investigate options to better coordinate mental health and addictions services in Toronto, including the necessity and feasibility of a dedicated office; and,

  - to develop an advocacy strategy, including using elected officials, to lobby the Provincial and Federal Governments for increased support for community-based agencies delivering mental health services in Toronto.

TPSB has also recognized the need and advocated for funding from other levels of government

TPSB has also made similar requests. In January 2021, the Board sent a letter to municipal, provincial and federal governments[46] to advocate for necessary changes in order to ensure public safety and improve police accountability.

The letter indicated that, "*...we are requesting that the Government of Canada and the Government of Ontario join the City of Toronto to provide funding for community-based services to work in collaboration with police crisis services and Ontario Health Teams and, more specifically, for organizations that provide relevant resources, services and support to assist individuals responding to mental health and addictions related issues*"

SafeTO: Toronto's Ten-Year Community Safety and Well-Being Plan highlights the need for support

In a June 2021 report to the Executive Committee[47] presenting *SafeTO: Toronto's Ten-Year Community Safety and Well-Being Plan*, which was endorsed by TPSB, the City highlights that "*...the majority of community safety investments need to be focused on developing and/or enhancing programs that focus on social development, prevention, and intervention through multi-sector collaboration to reduce the reliance on reactive emergency response. **The City cannot make this shift alone. For the City to be successful, a whole-of-governments approach consisting of effective partnerships with and investments from other orders of government is critical**.*"

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[45] Link to Council Decision

[46] Letter from TPSB

[47] Report from Executive Director, Social Development Finance & Administration relating to SafeTO: Toronto's Ten-Year Community Safety and Well-Being Plan

In our view and based on the results of this project, a simple transfer of budget from TPS to the City to fund alternative non-police responses, is currently not possible and would very likely not be enough. Until alternative responses are effective and available when needed, PRU officers may still be required to attend these calls for service. In addition, we have identified concerns relating to increasing response times which freed up PRU capacity would help address, along with other TPS strategic priorities.

The Auditor General's recent report *Audit of TPS 9-1-1 PSAP Operations* has also outlined the investment needed in the Public Safety Answering Point 9-1-1 infrastructure and information systems that will be beneficial to all stakeholders involved.

There is a need for substantial investment in sustainable social service infrastructure, including the areas of mental health, addictions and homelessness, to achieve longer-term value-for-money through providing more effective supports to promote better outcomes for individuals and the community. This will require a "whole-of government" approach, with investment needed from the other levels of government.

Concrete community-wide plans that include the desired outcomes from 9-1-1 calls and a framework to capture data and track and evaluate pilot outcomes is needed. This will help the City, TPS, and other stakeholders make evidence-based decisions and ensure transparency and accountability as all stakeholders move forward together.

Leveraging Other Jurisdictional Models and Lessons Learned from Existing Initiatives

City may benefit from leveraging best practices

In exploring alternative response models, there are a number of existing City initiatives and other jurisdictional models[48] that the City may want to examine for insights. The alternative response models outlined below address supporting people with mental health challenges, community mediation for disputes, and those experiencing homelessness.

<u>Supporting Mental Health through the City's Community Crisis Service Pilot</u>

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[48] The jurisdictional programs we highlight in our report are only intended to act as illustrative examples that the City may wish to examine further in developing alternative response models. The population and demographics of Toronto are different than some of the jurisdictions where these programs are operating. Independently assessing/evaluating the outcomes and performance of these programs was outside of the scope of our project, however we have highlighted publicly available information.

Toronto Community Crisis Service pilots have launched in Toronto	In February 2021, City Council endorsed the implementation of Toronto Community Crisis Service (formerly known as the Community Crisis Support Service pilot) to be piloted in four areas of the City. These pilots will test a new community-led approach to mental health crisis calls to 9-1-1, including those involving persons in crisis and wellness checks. There are currently two pilots actively running in Toronto, led by anchor partners Gerstein Crisis Centre (downtown east) and TAIBU Community Health Centre (northeast), with another two planned for July 2022 (downtown west and northwest).
Calls for service that meet certain criteria may be diverted to mobile crisis teams	Currently, the Toronto Community Crisis Service pilot is working with TPS's 9-1-1 Communications Services unit to triage calls that meet certain criteria to mobile crisis teams. Criteria include, calls that: • are non-emergencies and presents no public safety concerns; • fall within the defined pilot areas; • fall within the agreed upon call types eligible for a program response (e.g. threatened suicide, person in crisis, wellbeing check, disorderly behaviour, disputes); and, • there is a behavioural or mental health component to the call for service that would benefit from the support of the program. Alternatively, residents can also call 2-1-1 directly, Ontario's community and social services helpline, as the phone number to be connected with mobile crisis response teams in the areas of the city where the pilots are currently operating.
An evaluation of program outcomes is necessary before considering expansion	While an evaluation of the Toronto Community Crisis Service and its outcomes will be necessary before considering expansion, the program is a positive step forward for the City. The model may prove to be an effective alternative response model for consideration and may also provide the framework for developing other non-police alternative response pilots. At the same time, TPS has also launched its own pilot, the Gerstein Crisis Centre call for service diversion pilot, which includes diverting certain non-emergency mental health-related crisis calls for service that meet specific, non-imminent risk criteria and which may benefit from a non-police mental health crisis response, to trained mental health crisis workers, instead of police officers. This pilot and the Toronto Community Crisis Service pilot are discussed further in section C.1 of this report.
CAHOOTS model may provide additional insights	Other jurisdictions have implemented similar programs that may provide further insights that the City could consider. For example Crisis Assistance Helping Out On the Streets (CAHOOTS) is a mobile crisis-intervention program that was created in 1989 and is a partnership between White Bird Clinic and the City of Eugene, Oregon to provide a non-police, community based response to calls for service involving mental illness, homelessness and addictions.

The White Bird Clinic reported that CAHOOTS responded to 24,000 calls for service for assistance in 2019, and only 150 of those calls for service required backup from the police department.

The White Bird Clinic also reported that the CAHOOTS teams answered 17 per cent of the Eugene Police Department's overall call volume and saves the city of Eugene an estimated $8.5 million in public safety spending annually[49] as well as diverts a large number of medical calls for service from fire/EMS and/or the emergency room.

Community Mediation for Disputes

Community mediation may present alternatives to police for disputes

Use of community mediation may present an alternative to dispatching PRU for certain disputes, including some landlord and tenant disputes. While police response may address the immediate confrontation and provide effective de-escalation and mediation assistance, this can take up PRU officer time, and prevents officers from being available for higher priority calls for service.

Community mediation also presents opportunities for a preventive approach, can reduce repeat police calls for service to conflict situations, and can potentially decrease an individual's interactions with the legal system and law enforcement.

City has already piloted community mediation dispute programs

In a report to the City's Licensing and Standards Committee in March 2018[50], MLS indicated that at least a dozen municipalities across Canada and the United States use community mediation, a type of alternative dispute resolution, to help resolve conflicts between neighbours and divert unnecessary cases from city resources. The report suggested that these programs point to success in diverting cases from by-law enforcement and getting to the root cause of long-standing community or neighbour-to-neighbour issues.

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[49] As per White Bird Clinic Media Guide 2020 (CAHOOTS Media Guide 2020). The Eugene Police Department Crime Analysis Unit also conducted its own analysis that indicated there were over 15,000 calls for service that CAHOOTS were both dispatched and arrived, of which 311 (two per cent) CAHOOTS called for police back up (CAHOOTS Program Analysis). We have not reviewed and verified the numbers and performance results as part of this project and are not providing assurance on them.

[50] Link to Report to Licensing and Standards Committee

The Division went on to run a one-year community mediation referral program, entering into a Memorandum of Understanding with St. Stephen's Community House[51], and in 2019 reported that the program demonstrated positive outcomes and was slated for expansion to all enforcement services across the division in 2020. The City should consider if this program can be expanded beyond by-law issues as an alternative to address dispute calls for service which would have otherwise been addressed by police.

Dayton Mediation Response Program may provide insights

Another jurisdiction is piloting a community mediation model that may prove to be a possible alternative to a police response. The City of Dayton, Ohio, plans to launch a Mediation Response Program in spring 2022 to act as an alternative to police response for certain non-violent 9-1-1 neighbourhood dispute calls (e.g. neighbour disputes, noise, etc.), either by telephone, or in person through the dispatch of mediation field teams[52].

The Mediation Response Program[53] will not address calls for service where the dispute is fundamentally defined by a behavioural/mental health challenge as these calls for service will be handled by a separate crisis response team.

The City of Dayton reported that expected program benefits include higher police availability for rapid response to high priority calls for service and addressing the underlying causes of conflict, reducing repeat calls for service. The City and TPS should consider future evaluation results of this program, and explore if a similar model, starting with a pilot program, might work to resolve certain dispute calls for service in Toronto.

<u>Opportunities to Better Support Persons Experiencing Homelessness</u>

When PRU officers are dispatched to respond to a situation where there is a person experiencing homelessness (e.g. Unwanted Guest events in restaurant or other type of business), their ability to address the underlying root causes of challenges that these individuals may be facing, such as housing instability, is limited. A PRU police response is not intended to and cannot resolve the complex needs of vulnerable people experiencing homelessness or mental health challenges.

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[51] St. Stephen's Community House is a community organization that receives funding from the City of Toronto and offers a variety of services including community mediation.

[52] Based on information published by the City of Dayton on November 5, 2021 (https://www.daytonohio.gov/ArchiveCenter/ViewFile/Item/1946)

[53] Based on the program overview published by the City of Dayton in October 2021 (PowerPoint Presentation (daytonohio.gov))

Some jurisdictions are piloting diversion programs to engage and provide support to individuals experiencing homelessness	Some jurisdictions are piloting diversion programs to engage and provide support to individuals experiencing homelessness, which may be an option for the City to consider. For example, in 2021, the Los Angeles's Mayor's Office announced the launch of a Crisis and Incident Response through Community-Led Engagement (CIRCLE) pilot, to divert non-violent 9-1-1 calls for service related to individuals experiencing homelessness, away from law enforcement to trained, unarmed professionals. The pilot includes hiring people who use their lived experiences to build rapport with those who are currently experiencing homelessness and connect them with support resources.

City's Streets to Homes Program

City's Streets to Homes Outreach and Support program provides support to people experiencing homelessness	The City's Shelter Support and Housing Administration Division operates a Streets to Homes program that provides street outreach services and housing-related follow-up supports to assist people who are sleeping outdoors or who are street-involved to find and keep housing.

Street outreach is considered the first point of contact in engaging individuals experiencing homelessness into stabilized housing. Outreach staff work one-on-one with individuals experiencing homelessness to help find them housing and other supports.

Direct street outreach is provided by City of Toronto staff through the Streets to Homes program. In addition to this, the City also funds several community agencies to provide outreach services. |
| **Streets to Homes Outreach program runs as a 24/7 operation, 365 days a year** | The program runs as a 24 hours a day, seven days a week operation, 365 days a year, and is organized into three shifts (7:30 am to 3:30 pm, 3:30 pm to 11:30 pm and 11:30 pm to 7:30 am). During all regular shifts, there are three teams with two street outreach workers per team, except during extreme cold weather alerts. Outreach workers travel by both vehicle and foot.

From 7:30 am to 3:30 pm, the City Streets to Homes teams provide outreach services in the downtown core. After 5 pm, when many of the partnered community agencies close, the catchment area for the City teams is expanded to cover the entire City of Toronto. |
| **Street outreach staffing is limited** | Management has indicated that staffing is limited, and it can sometimes take a very long time for teams to respond to needs for service across the City. Further, the teams are not designed to act as an immediate emergency response. |

Some people may avoid shelters due to previous negative experiences or safety/privacy concerns

Another challenge is that some people who are experiencing homelessness may have had negative experiences in the City's shelter system and prefer to find temporary shelter outside. Survey results published by the City in 2021 indicated that safety concerns, lack of privacy, and negative experiences during prior stays were top reasons why respondents did not access shelters.

Capacity constraints with available shelter spaces and supportive housing

There are also capacity constraints with the availability of the City's shelter spaces and with access to affordable and supportive housing[54].

Safe Beds

Safe beds can be helpful for persons in crisis, but capacity is limited

Short-term residential crisis support beds (often referred to as "safe beds") provide temporary residential support for people living with mental illness who are experiencing a crisis. Safe beds may provide a helpful tool in certain situations. In our interview with City management, they stated that safe beds may be a tool to address the gap for shelter of certain persons in crisis who are also experiencing homelessness.

However, capacity for safe beds is also limited. This was highlighted in the *Justice-focused Mental Health Supportive Housing in Toronto Needs Assessment and Action Plan*[55] which mentioned that:

"The Safe Bed system has too few beds compared to needs, and few options to move to after a short stay – leading to discharge into homelessness, and pressure to shorten the standard lengths of stay".

Safe beds can help those experiencing homelessness receive the supports they need

Some safe bed programs are specifically designated for those who are experiencing homelessness or at risk of homelessness, and/or currently involved with the criminal justice system. The goal of the program is to address any immediate needs, such as food, clothing, and counselling, and develop a long-term plan through referrals to community supports.

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[54] In September 2020, a *Housing and People Action Plan* (Link to Plan) was presented at the Planning and Housing Committee meeting which highlighted that, *"Cities continue to struggle with too many residents on excessively long waiting lists for appropriate housing...Quick solutions are desperately needed now to provide a "relief valve" in our housing and shelter systems."*

[55] In July 2020, the Canadian Mental Health Association Toronto Branch, Wellesley Institute, and Addictions and Mental Health released a needs assessment, along with recommendations for action in Toronto relating to justice-focused mental health supportive housing in Toronto (Link to Report)

TPS procedures encourage officers to consider community resources including safe beds

TPS's *Persons in Crisis* procedure indicates that TPS members are encouraged to access TPS's Mental Health Referrals Guide, which includes information on the safe bed program, and provides direction on how safe bed referrals should be made. The procedure indicates that connecting community members to supports may improve their quality of life and/or decrease the likelihood they will require emergency services in the future.

In November 2020, the Government of Ontario announced $5 million for safe bed programs to support mobile crisis teams[56], including two urban safe bed programs in downtown Toronto and Ottawa. These programs provide individuals in mental health and addictions crisis who are in contact with mobile crisis teams with short-stay, 24 hours a day, seven days a week, community residential crisis services.

More resources are needed

More resources are needed to address the challenges and better support persons in crisis and experiencing homelessness. This may help to reduce the involvement of police and will improve outcomes.

Recommendations:

1. City Council request the City Manager, and the Toronto Police Services Board direct the Chief, Toronto Police Service (**TPS**) to work in collaboration along with other agencies, to determine the feasibility of setting up adequately resourced, non-time restrictive, alternative responses for events where police are currently attending and where such attendance is likely not essential.

   In doing so, the City and TPS should:

   a) identify call for service event types, including but not limited to, the six event types discussed in our report that may be suitable for an alternative response;

   b) develop reasonable criteria for each event type to assess the calls for service within those event types that may be suitable for an alternative response, including defining the level of acceptable risk and liability and how these factors will be managed;

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[56] Link to the news release

c) consider alternative response pilot programs (e.g. community dispute mediation), with adequate evaluation mechanisms, to provide information and insights on the effectiveness of any established responses. This should include an assessment of the feasibility and cost-effectiveness of providing these alternative responses;

d) consider existing City or other community programs that could provide an alternative response and where needed, the feasibility and cost-effectiveness of changing the approach and resourcing to provide a timely and effective non-police response (e.g. Municipal Licensing and Standards Division for noisy small gatherings, Shelter, Support & Housing Administration Division street outreach teams);

e) consider a gradual and informed approach to establishing responses and assess the factors that would be needed for an effective and efficient full transition, including consultation with the public; and,

f) develop and regularly update a plan that includes key milestones and targets so that progress can be tracked.

2. City Council request the City Manager, in consultation with the Toronto Police Services Board, to reiterate the City's requests for funding commitments from the Government of Canada and the Ontario Government to support permanent housing options and to provide supports to address Toronto's mental health and addictions crises.

In doing so, the City should communicate to the other governments that a "whole-of-government" funding approach in these areas will be critical to building the infrastructure needed to support effective alternative response delivery and ensure the best possible outcomes for the people of Toronto.

Opportunities to Continue to Improve and Use Alternative Police Response Units

TPS has established alternative police response units for non-urgent police matters

TPS already has several different units that provide alternative police responses and help divert some calls for service from the PRU so that they can focus on higher priority calls for service. Expanding the use of, and making improvements to, the way these units operate, may provide another option for diverting some calls for service. These include:

- The **Primary Report Intake, Management and Entry Unit (PRIME),** which is a specialized unit within TPS's Communications Services unit that provides the public with telephone and online response to non-emergency calls for service.

  PRIME manages the online Citizen Online Report Entry (CORE) system, which the public can use to report certain calls for service. There are 40 members, including police constables and supervisory officers currently working in the PRIME Unit.

- **Community Investigative Support Unit (CISU),** created to expedite initial response to lower priority, non-emergency calls for service, and free-up PRU time. The CISU model is divisional based and CISU officers are assigned to each division under the direction of the unit commander (the senior officer in charge of a TPS division).

  CISU officers can either be assigned to work at TPS division (station) locations or on the road as mobile units. Station CISU officers can be assigned a variety of duties at TPS divisions which include investigating certain walk-in occurrences and completing reports. Mobile officers complete at-scene investigations and can also back-up the PRU on priority calls for service when required for officer safety purposes.

  Management reported that there are currently over 150 CISU officers, of which approximately 30 per cent are mobile. Management also reported that this number can vary by division on a monthly basis due to accommodations and restrictions.

- *District Special Constables*, civilian members that are granted some police powers, and support front-line officers by performing a variety of duties relating to low-risk/low priority events such as relieving police officers who have conducted mental health apprehensions and are waiting for a physician to take custody, assisting with basic investigations (e.g. canvassing for video and witnesses), writing reports, and assisting with missing persons searches.

  District Special Constables can also respond to certain lower priority, non-emergency calls for service (priority four to six calls)[57]. There are over 130 District Special Constables working at TPS divisions.

A summary of the alternative response units is included in Figure 15 below.

Figure 15: TPS Alternative Police Response Units

Alternative Police Response Unit	Primary Report Intake, Management and Entry Unit (PRIME)	Community Investigative Support Unit (CISU)	District Special Constables (DSC)
Staffing Numbers	40	Over 150 (30% are mobile officers)	Over 130
Main Function	Officers that provide telephone and online response to non-emergency calls for service	Created to expedite initial response to lower priority, non-emergency calls for service, and free-up PRU time. Can either work at TPS division stations or be mobile	Civilian members with some police powers that support front line members with a variety of duties Can also respond to some lower priority, non-emergency calls for service under certain conditions (e.g. no suspect on scene, and no immediate safety risk)
Location	TPS Communications Services	Each TPS Division	Each TPS Division

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[57] District Special Constables are not intended to replace PRU police officers and may be utilized in certain lower priority calls when there is no suspect on scene, and no immediate safety risk (e.g. they may respond to take a report). Internal guidelines we reviewed indicate that when a supervisor is deploying a District Special Constable to an event, consideration must be given to factors including the surroundings (including any imminent threats to public or officer safety), their level of experience and the use of force options they are trained in and equipped with.

TPS is facing staffing challenges at its police alternative response units

Both the PRIME and CISU are primarily staffed by sworn TPS members who are on restricted and/or accommodated (medical or non-medical) duties. In this way, these units help to not only free up PRU officer time but can also help provide meaningful work for officers on accommodation. However, this has contributed to challenges in ensuring the units are adequately staffed. Management has reported that staffing in the PRIME and CISU units is fluid and can vary from period to period based on the restriction/accommodation needs of TPS members.

Management also reported that the District Special Constable program has a vacancy rate of approximately 25 per cent and that there are challenges with retaining staff as some district special constables see the program as a "stepping stone" to a career as a police officer. It is also important to note that District Special Constables are not intended to and cannot replace sworn police officers. They are intended to support police officers and there needs to be careful consideration in terms of their assigned work and responsibilities.

Staffing challenges at the PRIME Unit has led to some delays and a backlog of calls for service

Management has reported delays in response times and backlog of calls for service which have been forwarded to the PRIME Unit for resolution. Based on a daily log provided by management, we noted that there can be hundreds of pending calls for service at the end of a day, waiting to be addressed by staff. The unit is only staffed from 6:00 a.m. to 11:00 p.m. each day.

TPS should consider if there are staffing strategies to address these challenges

In order to ensure that alternative police response units are able to provide effective support to PRU units and free-up front-line time, TPS should consider if staffing strategies can be implemented to address lower priority, non-emergency calls for service that are assigned to these units. For example, there may be innovative strategies such as proactively asking retired officers if they would be interested in assisting these units on a part-time basis or considering the use of civilian members to address some calls.

Cross-training all TPS Special Constables may provide more opportunities for PRU support

Apart from District Special Constables, TPS also employs over 350 Court Special Constables that work in TPS's Court Services Unit and perform a variety of duties, including maintaining the safety and security within court locations, and control and security of persons in custody who are required to attend court. TPS should also consider if opportunities exist for cross-training all TPS Special Constables, including those that work as court officers and in TPS divisions, to increase the pool of Special Constables available to respond to calls for service.

TPS is pursuing this opportunity and in 2022 posted a job call for a "generalist" special constable role that indicates candidates will rotate between the district special constable, divisional booking area (e.g. management of person in custody in TPS divisions), and court services functions of TPS throughout their careers. Management also indicated that current TPS special constables will undertake a patch course so that they are trained in all TPS special constable functions.

Opportunities to Better Coordinate the Activities of the PRIME and CISU Units

There are overlaps in the functions performed by PRIME and CISU

Although there are a number of CISU officers that are considered mobile, and can travel to attend lower priority, non emergency calls for service, there appear to be possible overlaps in the functions performed between PRIME Unit and CISU members, and potential synergies for coordinating the operations of both groups in responding to low-priority, non-emergency calls for service.

Processes for handling calls for service differ between PRIME and CISU

While the criteria of the types of non-emergency calls for service which are suitable for being resolved by the units are similar, the process for dispatching and call for service assignment is different.

CISU members generally volunteer for calls for service while PRIME Unit is assigned certain events by default

CISU members are required to continuously monitor the call for service event system and volunteer for lower priority, non-emergency calls for service that meet the criteria of the CISU.

TPS's dispatching procedures indicate that when a low priority, non-emergency (priority four to six) call for service appears on the board, the dispatcher will wait for 15 minutes to provide enough time for CISU personnel to review the call for service and determine if they will accept the call. If no comment has been added indicating that someone from the unit will handle the call, the dispatcher will dispatch the call for service to a PRU unit.

By contrast, there are certain event types, such as theft not in progress, and fraud that are designated for resolution by the PRIME Unit[58]. Once forwarded to the PRIME Unit, these calls for service will remain with them for resolution unless it is determined that they do not meet the criteria for resolution by the unit.

Reporting structure between CISU and PRIME is different

In addition, the PRIME Unit is centralized within TPS Communications Services, while CISU members are dispersed within each division and work assignments are ultimately determined by the divisional unit commander.

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[58] When a call for service for a certain, non-emergency event types (e.g. theft, fraud) is received at TPS Communications Services, the call taker will assess the situation to determine whether the event satisfies the criteria for response by PRIME. If so, an event is created and assigned to the PRIME Unit.

Management indicated a review is underway

Management indicated that a review is currently underway to centralize and streamline the CISU dispatching program. While TPS should continue with these efforts in order to ensure the efficient handling of low priority calls for service, it should further consider opportunities to integrate the two units.

Given staffing shortages and similar functions performed by both groups, this may help manage the volume of calls for service received by the PRIME Unit, and result in better response times and workload management.

Recommendations:

3.   **Toronto Police Services Board direct the Chief, Toronto Police Service (TPS), in consultation with the Toronto Police Association, to:**

    a) **assess the impact of expanding the Primary Report Intake, Management and Entry (PRIME) Unit, Community Investigative Support Unit (CISU) and District Special Constable programs, and, where appropriate, if it would assist with supporting and/or further reducing the time spent on events currently attended by Priority Response Unit (PRU) officers. For the PRIME and CISU units, consider both sworn members (including retired officers) and potentially civilian members, where appropriate, for potential expanded capacity.**

    b) **consider if all TPS Special Constables, including Court Officers and District Special Constables, can be cross-trained to increase the pool of Special Constables available to assist the PRU in call for service diversion.**

4.   **Toronto Police Services Board direct the Chief, Toronto Police Service to examine if:**

    a) **aspects of the Primary Report Intake, Management and Entry Unit and Community Investigative Support Unit (CISU) can be centralized together, so that the workload can be shared and calls for service can be handled more efficiently.**

    b) **For aspects that cannot be centralized, (e.g. mobile CISU units) consider more clearly defining the responsibilities and expectations, including workload allocations, to both units.**

Opportunities to Re-visit Response to See Ambulance Protocols

See Ambulance calls for service are requests from Toronto Paramedic Services for PRU officers to attend calls for service

See Ambulance event types are requests from Toronto Paramedic Services for PRU officers to attend calls for service where either:

1. the caller or paramedics have provided information that suggest possible on-scene safety concerns (e.g. reported or suspected violence); or,

2. for other circumstances where police assistance may be needed and there is no immediate safety concern (e.g. building access issues).

Our review did not examine urgent paramedic requests for assistance or life-threatening situations

Toronto Paramedic Services also request PRU officers to attend for these event types:

- Echo-Tiered event types, which are life threatening medical emergencies (e.g. cardiac or respiratory arrest) that require immediate first responder intervention (e.g. CPR, defibrillator) and TPS, Toronto Fire Services and Toronto Paramedic Services are all dispatched to attend, and,

- Assist Ambulance event types, which indicate an urgent request for assistance due to an immediate paramedic crew safety concern.

Our review did not include an examination of calls for service classified as Echo-Tiered or Assist Ambulance.

PRU officers are sometimes dispatched due to the presence of alcohol

Of the See Ambulance calls for service we reviewed, we noted that PRU officers sometimes attended calls for service where the primary complaint was medical in nature and there was no clearly articulated safety risk or immediate danger to paramedic safety. In some cases, officers were dispatched due to the fact that the presence or consumption of alcohol was mentioned by the caller.

See Ambulance calls are one of the mostly frequently dispatched call for service event types with over 26K calls in 2019

In 2019, there were over 26,000 See Ambulance calls for service dispatched, one of the most frequently dispatched event types. If even a small portion of these calls for service decreased, this could have a significant impact on PRU time.

Example: PRU are Asked to Attend a Medical Call

A Toronto Paramedic Services call taker asked PRU to attend a call for service where an individual was found unconscious at a shopping mall and a bottle of rubbing alcohol was found next to him.

Need to better define when police are required

While Toronto Paramedic Services policy requires call takers to clearly document the reasons for police notification in their call for service taking system, we could not locate a clear rationale for requesting police in most of the call for service documentation reviewed.

Presence of alcohol is not listed as a reason for police notification in Toronto Paramedic Services procedures

For some calls where the presence/consumption was noted, we heard Toronto Paramedic Services reference that they *"had to"* or *"it's just our protocol"*. In reviewing Toronto Paramedic Services policies on police notification, the presence of alcohol was not listed as a circumstance that requires police notification. TPS management also indicated that it was a common practice for TPS call takers to dispatch PRU for calls for service where alcohol had been consumed or was present.

Noting "*see you there*" is commonly used to request attendance

We also noted that it was common practice for Toronto Paramedic Services or TPS call takers to simply indicate *"see you there"* while on the call with TPS to acknowledge that they would like the other agency to attend.

Toronto Paramedic Services management indicated that the rationale for police attendance can be inferred from the factors documented in the call for service (e.g. presence of alcohol) and given the volume of calls for service, call takers are limited in their ability to document details regarding why police were requested.

Management further indicated that in most cases, when Toronto Paramedic Services call takers indicate *"see you there"* it is because they know that TPS may respond to the call for service anyways. TPS call takers are not required to, and do not generally document if they would have dispatched police to See Ambulance calls for service had the request not been made by Toronto Paramedic Services.

See Ambulance requests not routinely reviewed

We also found while management indicated TPS and Toronto Paramedic Services meet regularly, they do not routinely review call for service data to evaluate if See Ambulance requests are appropriate or if enhancements to the process are needed.

Previous Review of See Ambulance Practices

Our review is not the first time that See Ambulance practices have been a topic of review by an independent body.

Ministry of Health conducted an inquiry in 2009 followed by a coroner's inquest	In 2009, the Ministry of Health & Long-Term Care (now the Ministry of Health) investigated a delayed emergency ambulance response to a member of the public who had been found lying in a hallway of an apartment building and who the caller mentioned may have possibly been drinking. The individual was followed by a coroner's inquest (referred to as the "Hearst Inquest") released in March 2012.

A See Ambulance call for service for police assistance was created at the request of Toronto Paramedic Services, in part due to the fact that the patient had been drinking, and because the call for service was classified as an "unknown medical problem" (potentially serious and unknown emergency call for service involving illness or injury).

Paramedics decided to wait at a nearby intersection (a practice known as "staging") until police arrived. At the time of the call, the divisional PRU officers were assigned to other calls for service and did not arrive until approximately 40 minutes after the paramedics call taker contacted TPS. The patient was ultimately declared deceased as a result of a heart-attack.

Although the report comments that the police response was delayed since it was a busy night, the average response times for TPS have been increasing. The average TPS response time for priority two calls for service (which include See Ambulance events) was approximately 50 minutes in 2019. If TPS response times continue to trend upwards, this increases the potential for future delays. |
| **Report found gaps in police request and risk assessment processes** | The Ministry of Health & Long-Term Care report highlighted that "unknown medical problem" type calls for service are not listed as a reason to request police assistance in Toronto Paramedic Services' procedures, nor are police to be automatically notified if there is reason to believe a patient had been drinking. The report found that the dispatcher had contravened Toronto Paramedic Services polices when they had requested TPS attend the call.

The report further mentioned that there were no details in the call for service report to indicate either real or potential violence/safety hazard on scene and found that dispatchers did not document all pertinent information in the Toronto Paramedic Services call for service system. |
| **Coroner's inquest found similar gaps** | Recommendations were also made by the jury in the 2012 coroner's inquest that included:

- o improving the level of documentation for calls for service, including documenting call for service details, reasons for staging events provided by paramedics and the nature of threat/scene safety issues |

o clarifying procedures around police notification, and in particular, that TPS should not be routinely notified to attend unknown medical problem (e.g. confusing medical symptoms) calls. Where they are requested for this type of call, the reasons for police notification should be clearly documented in the call history.

|	
There are still gaps in the level of Toronto Paramedic Services documentation	While Toronto Paramedic Services have updated their police notification procedures around "unknown medical problem" calls for service, there still appear to be gaps in the level of documentation around the specific nature of the threat(s)/safety hazard(s) to support requests for police attendance, as demonstrated through our review. In addition, despite being highlighted in the Ministry of Health & Long-Term Care report as contrary to Toronto Paramedic Services policies, police are still being notified to attend calls for service where individuals have been drinking.
See Ambulance protocols between the two entities should be revisited	When Toronto Paramedic Services request TPS to attend calls for service where there is not a clearly articulated risk of real or potential violence/safety hazards, PRU resources are being tied up. Also, when paramedics decide to wait for the police to arrive before attending to an individual, this could potentially delay emergency medical care and result in harm or loss of life.
Refined risk-assessment is needed	We recognize that there are situations where police attendance at these types of calls for service is necessary to ensure paramedics are safe and to be able to provide life-saving services to residents. However, given limited PRU resources and the importance of having PRU response available in situations where prompt attendance by someone with the training and authority of a police officer is essential, it may be timely to revisit the protocol between TPS and Toronto Paramedic Services, particularly related to the presence of alcohol. Toronto Paramedic Services should ensure that a risk-based approach, supported by a properly documented rationale and regular monitoring, is applied to ensure that all requests for police notification are an efficient and effective use of PRU time.

Recommendation:

5.   City Council request the Chief, Toronto Paramedic Services, and the Toronto Police Services Board direct the Chief, Toronto Police Service (TPS) to work in collaboration to review current protocols for when Priority Response Unit (PRU) officers are requested for See Ambulance calls for service. This should include:

   a) determining if there are any opportunities to further refine the See Ambulance protocol so that the attendance of PRU officers is based on an articulable risk to paramedic safety, specific to the unique circumstances of each call for service;

   b) re-evaluating the criteria for when police are requested. This evaluation should specifically consider, but not be limited to, if the presence of alcohol, in absence of other risk factors, requires an automatic PRU response;

   c) ensure that the rationale for requesting PRU attendance and other important information is clearly documented in the Toronto Paramedic Services call for service details. Both entities should also consider documenting which entity initiated the request for attendance from the other entity;

   d) in situations where TPS would have sent PRU officers to calls for service irrespective of a request from Toronto Paramedic Services, TPS should consider documenting this in its call for service system;

   e) regular, joint evaluation of calls for service where PRU attendance is requested, to assess the effectiveness and efficiency of the revised protocol and consider any changes as necessary; and,

   f) consider if additional training is needed for TPS and Toronto Paramedic Services call takers to ensure requests for police attendance are well documented and comply with policies and procedures.

A. 2. Response & Clearance Times

Figure 16: Response and Clearance Methodology
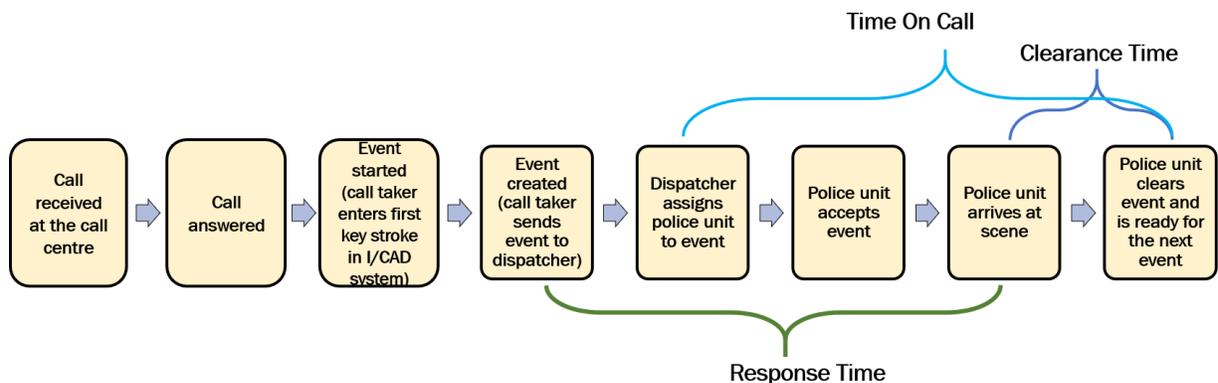
Response and clearance times are commonly used metrics to evaluate police performance

Response times are a commonly used metric to evaluate police performance. As illustrated in Figure 16 above, TPS defines **response time** as the difference in time between when the call taker sends the call for service to a TPS dispatcher so that an officer can be assigned to the event, and when the first unit, of all units dispatched to a call for service, arrives at scene[59]. Response times can be impacted by various factors including geographic area of the community served, the length of time it takes to travel to the call for service, and resource/staffing availability.

Clearance time is defined by TPS as the difference in time between when officers arrive at-scene to a call for service[60] and when they are available to be dispatched to a new call for service. Clearance time can include the time taken to resolve the call for service and also completing any notes, reports, or other investigative requirements.

Clearance times can vary due to the individual characteristics of the event. For example, calls for service which have reporting requirements (e.g. officer is required to fill out a report) may take longer.

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[59] In calculating response times for reporting purposes, TPS only includes calls for service where at least one PRU unit was dispatched. However, other TPS groups may have also been dispatched to attend the call for service (e.g. CRU, Traffic, etc.). In these situations, TPS calculates response time based on the time that the first police unit arrives at-scene, out of all the units dispatched.

[60] In calculating clearance times for reporting purposes, TPS only considers the time spent by PRU units that attended the call for service, even if other TPS groups may have also attended the call for service. If multiple PRU units attended the event, the clearance time is calculating using an average of time spent by all PRU units.

TPS considers response time a key performance metric but has faced challenges

TPS has used response time as a metric in assessing service performance for many years. In the *Way Forward* report, TPS stated that response times would be one of the key measures used to assess operational excellence. This was further reiterated in its 2022 budget submission where TPS noted that maintaining response times to ensure people in Toronto in need of emergency services receive timely and appropriate response that provides required assistance and reduces criminal activity and severity, was a priority action.

Response times have been rising steadily

However, as illustrated in Table 2, TPS has experienced increasing response times over the last several years. For example, average response times for priority one calls for service have increased about 19 per cent from 2017 to 2019, and 17 per cent for priority two calls for service. The average response time for TPS to respond to a priority one call for service in 2019 was 19.1 minutes, and 50 minutes for a priority two call for service.

Increasing response times means the public is waiting longer for assistance

Priority one calls for service are the most urgent situations that officers must respond to and can involve a risk to life. Increasing response times means the public is waiting longer for assistance to calls for service. Each minute spent by a PRU officer on a lower priority, non-emergency call for service delays their ability to address other pending situations, some of which could be life-threatening or present the risk for danger or harm.

Time spent on non-emergency calls for service delays other pending situations

Generally, officers are not available to respond to another call for service until they have cleared the current call for service event they have been assigned to. Increasing response times may be indicative, at least in part, that officers are dealing with many call for service events that may not always be the highest priority. We also highlight other possible reasons for response time increases in the section below.

Table 2: Average Response Times from January 2017 to September 2021 and 2019 Performance Compared to 1995 Targets[61]

Priority Level	Average Response Time (Minutes)					Priority Level	2019 Performance Compared to Targets	
	2017	2018	2019	2020	Jan to Sept 2021		1995 Target (mins)	% Not Met
1	16.0	18.4	19.1	15.0	17.5	1	6	72%
2	42.6	45.5	50.0	39.2	45.9	2	6	92%
3	74.5	85.6	95.4	67.8	92.6	3	6	96%
4	94.6	109.2	120.3	89.4	110.9	4	60	41%
5	58.5	76.4	320.2	253.7	319.8	5	60	67%
6	189.9	268.2	299.2	244.9	282.2	6	60	57%

<u>Response Time Targets</u>

TPS has not adopted formal response time targets

Setting response time targets is an important part of organizational performance measurement as it allows the assessment of actual results, at the divisional or TPS wide level, against established criteria. According to historical TPS Year-End Performance reports, setting response time standards has been an organizational goal since at least 2014.

Response time objectives were approved by TPSB in 1995[62], Based on our discussions with TPS management, they have not been regularly used or measured against as formal organizational performance metrics, nor were they evaluated or revised in the intervening time. Due to the amount of time that has passed, these metrics would benefit from a review. Some members of TPS management that we interviewed were not even aware that TPS had any response time standards. These response time targets, and the associated 2019 performance is displayed in Table 2 above.

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[61] Response times are based on data provided by TPS. Priority two, four and six are default event priorities and the majority of calls for service that officers are dispatched to fall into these categories. Average response times for priority one, three and five events are based on significantly less calls for service than the default event priorities.

[62] At its March 1995 meeting, the Metropolitan Toronto Police Services Board (now the Toronto Police Services Board) approved recommendations from the report "*Beyond 2000: Final Report*" which resulted from the work of the Metropolitan Toronto Police Restructuring Task Force. Recommendation 11 of that report included response time standards and directed that the Metropolitan Toronto Police Force (now TPS) review at regular intervals its ability to achieve and maintain these standards and make adjustments as required. TPSB Office reported that no further changes to response time standards have been formally adopted since 1995.

Although we were initially provided with updated response time targets (for priority 1, 10 minutes 85 per cent of the time, for priority two and three, 16 minutes, and for priority four to six, 60 minutes), these have not been included for comparison purposes. Based on the information provided to us, they were designed to be used for development of the PRU alternative shift schedules, and not for TPS's response time performance metrics,[63] and have not been formally approved by TPSB or TPS.

TPS is not meeting its response time targets

The *"Beyond 2000: Final Report"* targets indicate that:

- **85 per cent** of **priority one** calls for service (defined as "Persons at Risk" in the *"Beyond 2000: Final report"*), should be answered in **six** minutes,

- **80 per cent** of **priority two to three**[64] calls for service (defined as "Crimes in Progress" in the *"Beyond 2000: Final report"*), should be answered in **six** minutes; and,

- **80 per cent** of **priority four to six** calls for service should be answered in **60** minutes.

TPS is not meeting its response time targets

As demonstrated in Table 3, TPS is not meeting these standards. In 2019:

- **72 per cent of** priority one calls for service took longer than **six** minutes

- **92 per cent** of priority two calls for service took longer than **six** minutes

- **96 per cent** of priority three calls for service took longer than **six** minutes

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[63] The Toronto Police Association informed us that a consultant was engaged to analyze PRU staffing and workload, as well as alternative shift schedules and as part of this work developed and used updated response time targets solely related to the travel time of officers.

[64] The *"Beyond 2000: Final Report"* identified that priority one and two calls for service should be assigned a six minute response time target. In TPS's call for service (I/CAD system) reporting user guide, we noted that priority three calls for service were also included in the six minute response time standard.

Table 3: Distribution of Response Times and Comparison to *"Beyond 2000: Final Report"* response time standards

2019 Response Time	Priority 1 Target: 85% in 6 minutes		Priority 2 Target: 80% in 6 minutes		Priority 3 Target: 80% in 6 minutes	
	# of Events	%	# of Events	%	# of Events	%
6 minutes or less	10,433	28%	8,343	8%	214	4%
Greater than 6 but less than or equal to 10 minutes	8,497	23%	12,849	12%	351	7%
Greater than 10 but less than or equal to 16 minutes	6,787	19%	19,292	17%	570	12%
Greater than 16 minutes	11,193	30%	69,381	63%	3,878	77%
Total	36,910	100%	109,865	100%	5,013	100%

TPS is also not meeting its response time target for priority four to six calls for service:

- **41 per cent** of priority four calls for service took longer than 60 minutes

- **67 per cent** of priority five calls for service took longer than 60 minutes

- **57 per cent** of priority six calls for service took longer than 60 minutes.

Average response times are also not meeting the targets. Figure 17, Figure 18, and Figure 19 compare TPS average response times (shown by blue bars) to these targets (red dotted lines) and illustrate that they are not being met.

Figure 17: Priority One Average Response Times Compared to Target

Priority 1 Average Response Time

- 2017: 16.0
- 2018: 18.4
- 2019: 19.1
- 2020: 15.0
- 2021: 17.5

6 mins
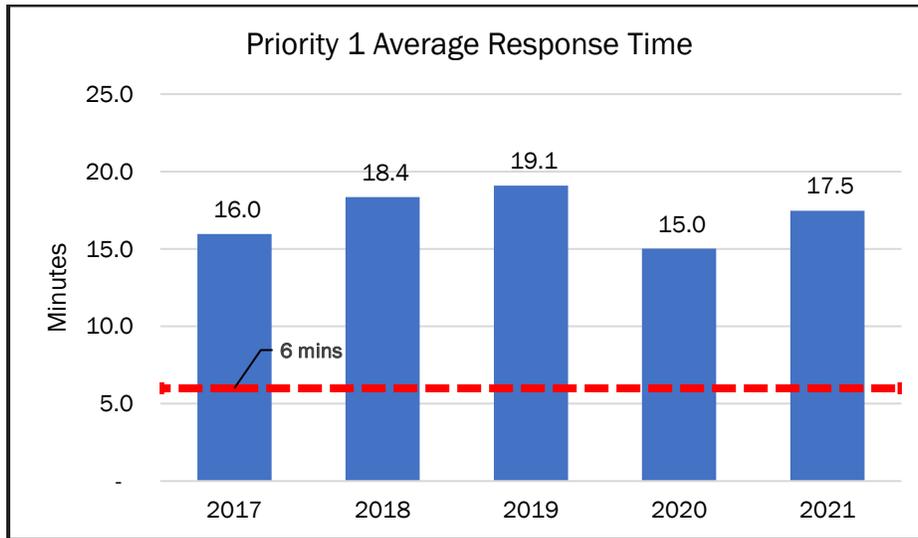
*The 2021 bar is for the period of January to September 2021

Figure 18: Priority Two Average Response Times Compared to Target

Priority 2 Average Response Time

- 2017: 42.6
- 2018: 45.5
- 2019: 50.0
- 2020: 39.2
- 2021: 45.9

6 mins
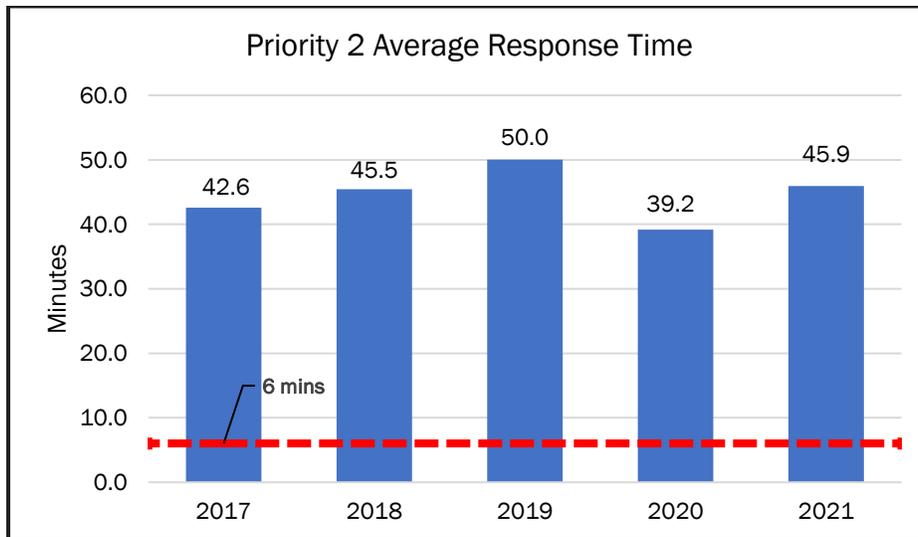
*The 2021 bar is for the period of January to September 2021

Figure 19: Priority Three Average Response Times Compared to Target
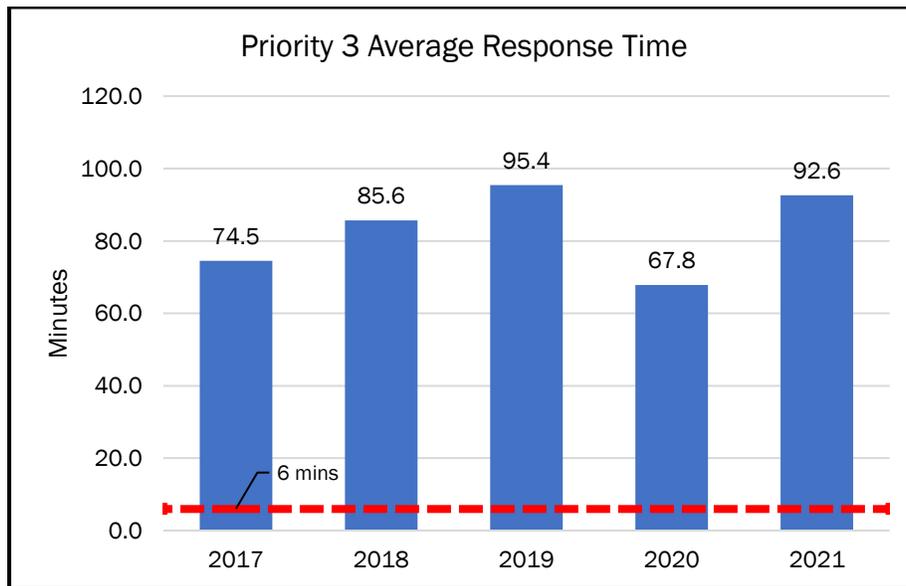
*The 2021 bar is for the period of January to September 2021

Understanding the Root Causes of Increasing Response Times

Root cause analysis is needed to understand the reasons for increasing response times

In the section below, we highlight potential factors which may be contributing to TPS's increasing response times. As there may be other factors in addition to the ones discussed, it will be important for TPS to perform a root cause analysis to fully analyze and develop strategies to address this issue.

Availability of PRU Officers

Availability of PRU officers impacts response times

The availability of PRU officers is one factor that influences response times and can vary by division. Management reported that in 2019, the range of deployable PRU officers (available to respond to calls for service) per division ranged from 77 per cent to 94 per cent.

PRU officers can be unavailable due to being on accommodation, long or short-term disability

Each division has a certain number of PRU officers, although not all officers may be deployable due to reasons including training requirements, being on accommodated/restricted duties (both medical and non-medical) and being off-work due to a short-term and/or long-term disability.

21% of PRU constables were not deployable in April 2022	Management reported that in April 2022, TPS had a complement of approximately 1,600 PRU constables, of which 113 (approximately seven per cent) were on leave due to illness or disability, parental leave, or a leave of absence due to other reasons. An additional 230 PRU constables (approximately 14 per cent) were reported as being on accommodated/light duties, suspended, assigned to station duties, or participating in the general constable training program which requires constables to work rotational assignments in other TPS areas for approximately one year to assist in their development.
	TPS has recently developed and management reported that it is in the process of implementing a member well-being strategy. As TPS continues to implement this strategy, in collaboration with the Toronto Police Association, it may want to consider more active management of members who are non-deployable and how to best support the well-being of TPS members.
External consultant developed staffing targets	In 2021, the Toronto Police Association engaged an external consultant to assist in establishing workload and staffing requirements for the PRU. The consultant prepared a report with target staffing levels for each TPS division that took into consideration factors which included meeting a 70/30 split between the time spent on calls for service/administrative work and uncommitted time, meeting 24 hours a day and seven days a week calls for service demand, and the number of officers unavailable to respond to calls for service due to circumstances such as being sick/on disability leave, training, etc.
Most divisions short of targeted numbers	As of April 2022, management reported that there were only four divisions meeting those target numbers, and the remaining 12 divisions ranged from one to 20 officers short of the targeted number[65]. During interviews with TPS members, we were told that PRU officers are assigned to work at one division and officers are generally not shared between divisions, other than on a per shift basis if required.
TPS should examine and consider staffing strategies	It will be important for TPS to further consider the impact of deployable staffing levels on response times. TPS should also develop strategies to help improve deployable staffing levels and achieve response time targets.

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[65] As the call rate is not constant throughout the year, the external consultant prepared two sets of staffing targets, a higher set for the busier "summer" period (May 20 –September 22) and one the "rest of the year". Our review only compared staffing levels as at April 2022 to the "rest of year" targets.

Clearance times are also increasing

As shown in Table 4 below, based on data provided by management, overall average clearance times have increased almost 15 per cent from 2017 to 2019, with the most pronounced increases in priority five and six calls for service, which increased approximately 41 per cent and 46 per cent respectively. When calls for service take longer to clear, this means that other calls for service can remain pending for longer, waiting for a police response, including emergency situations.

Table 4: Average Clearance Times from January 2017 to September 2021

Priority Level	Average Clearance Time (Minutes)				
	2017	2018	2019	2020	Jan to Sep 2021
1	121	120	120	121	128
2	88	92	98	101	108
3	72	73	75	80	89
4	57	59	63	64	71
5[66]	75	84	106	108	102
6	63	78	92	100	105
Priority 1 to 6	81	87	93	95	103

Clearance times varied by division

We also noted a wide range in clearance times at a divisional level, with some correlation to response times. For example, as per Table 5, divisions 42 and 53 had among the longest average clearance time for priority one calls for service, and also had the longest average response times.

TPS also does not set any benchmarks or standards for call for service clearance times

TPS also does not set any organizational benchmarks or standards for its call for service clearance times. While we recognize that each call for service is different and it may be difficult to set an absolute standard for each call for service event type, TPS should consider setting divisional or TPS-wide reasonableness thresholds to have a benchmark that can be used to evaluate call for service activity and identify trends at a high level (e.g. TPS-wide or divisional). This may help to inform potential training needs and high-level staffing/resourcing decisions.

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[66] Clearance times are based on data provided by TPS. In the data provided, TPS reported that it excluded calls for service for "Company Alarm", "Hold Up", "Residence Alarm", and "Roaming Personal Safety Alarm" event types from the priority 5 category as a result of the Alarm System Response Policy released in 2018.

Table 5: Average Clearance and Response Times by Division, 2019

Division[67]	Priority 1		Division	Priority 2		Division	Priority 3	
	Average Clearance Time (mins)	Average Response Time (mins)		Average Clearance Time (mins)	Average Response Time (mins)		Average Clearance Time (mins)	Average Response Time (mins)
12	136.3	17.9	31	117.3	56.8	31	100.9	117.7
42	134.2	23.9	42	115.1	65.5	33	88.6	100.4
53	129.7	23.9	12	105.9	44.8	42	87.6	149.9
41	128	16.6	41	105.7	42.2	41	85	79.5
32	127.2	22.3	23	102.8	42.1	23	81.2	79
31	124.4	20.1	32	102.3	59.6	43	78.8	62.1
22	120.6	18.3	13	101.9	44.9	53	78.7	133.5
43	119.3	17.4	53	101.3	68.7	52	77	110.9
11	118.7	17.9	54	100.6	39.7	54	75.3	60
23	118.7	20.4	33	96.4	44.9	32	73.8	130.3
54	117.9	14.9	52	95.8	64.3	13	68.5	74.9
13	115.1	17.1	43	94.1	42.7	14	68.2	97.1
55	115	15.3	55	90.3	37.6	12	67.3	80.6
33	114.2	20.9	11	89.1	40	22	65.9	64.3
52	114.2	20.6	22	87.8	40.6	11	65.4	69.2
14	108.7	18.7	51	86.6	50	51	63.4	112.6
51	104.3	19	14	85.3	55.1	55	62.1	74.5

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[67] TPS has amalgamated Division 54 and 55 into one division (known as Division 55), however, our review of the call for service data noted that activity from both divisions is still tracked separately in the call for service system.

Root cause analysis needed	While management has not yet completed a formal analysis, TPS indicated that increasing clearance times may be due to:

- the fact that the changing approach to policing is more time intensive, with more complex calls for service requiring more time to address;

- increasing demands on officers for documentation required for calls for service (note: *opportunities for automating the reporting process to free up officer time is discussed in Section B.4 of this report);* and,

- years-of-service/experience is declining on the front line, compounded by competing demands and resourcing issues for supervisory officers.

It will be important for TPS to better understand the root causes, including differences between divisions, in order to ensure calls for service are efficiently handled so that officers can respond to high priority calls for service as quickly as possible.

Response Time Calculation

Opportunities exist to refine response time calculation	In addition to having targets, in order for response time to be an effective performance metric, the calculation of response time must be complete and representative of actual operating performance.

As noted in Figure 20, we noted several opportunities for TPS to improve its response time calculation/methodology, including:

TPS excludes call answering time and other variables from its response time calculation	- Response times start from the point where the call taker sends the call for service to the dispatcher to assign police officers and do not include the time between when the call is received, to when the event is sent to the dispatcher by the call taker.

  - There are other North American jurisdictions that measure police response time from the point the call for service is answered.

  - This issue is explored further in the *Audit of TPS 9-1-1 PSAP Operations* report.

- Response time methodology excludes certain events where more than one TPS group (e.g. both a PRU officer and non-PRU officer) were dispatched to attend the event (known as "copied events")

Figure 20: TPS Response Time Calculation
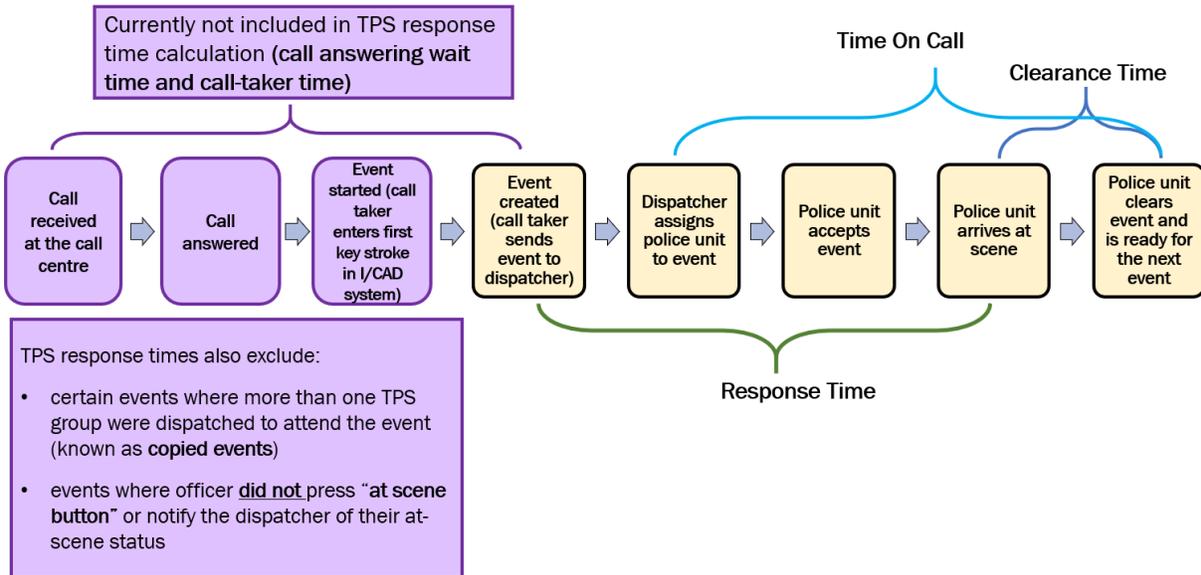
"At-Scene" Compliance

Response time calculation excludes calls for service where "at-scene" arrival time is unknown

We also noted that TPS's response time calculation excludes calls for service where there is no time stamp to indicate when officers arrived "at-scene" (the point at which officers arrive at the call for service location in order to address the event).

When officers arrive at a call for service, they are required to push the "at-scene" button on the mobile data terminal in their vehicles to record the time in the call for service event system to notify the dispatcher that they have arrived at the event. Officers without a mobile data terminal, or who are unable to push the button, must advise their dispatcher that they have arrived at-scene, who will manually record their status in the call for service event system.

"At-scene" compliance rate was about 70% overall in 2019

Based on data provided by TPS, we noted the overall 2019 compliance rate for "at-scene" notification was approximately 70 per cent[68] and specifically:

- **67 per cent** for priority one calls for service
- **71 per cent** for priority two and three calls for service
- **69 per cent** for priority four to six calls for service

By excluding events without "at-scene" arrive times, response time calculations may not be representative of the entire population of calls for service where officers attended and may impact TPS's ability to have a full picture of how long it takes to respond to calls for service.

"At-scene" compliance challenges are not a new issue

Ensuring compliance with "at-scene" compliance procedures has been an ongoing challenge for TPS for many years. A 2002 Service Performance Year-End report published by TPS included a performance objective to increase "at-scene" compliance rates for priority one calls for service, which were reported at 62 per cent at that time.

While some improvement has been made, TPS should continue to pursue strategies to increase compliance, including the use of automation to ensure response times are as representative as possible.

Recommendations:

6. **Toronto Police Services Board direct the Chief, Toronto Police Service (TPS) to evaluate the root causes for increasing response times and determine a strategy for meeting priority one to priority three response time targets. This should specifically include:**

    a) **considering strategies for how to improve staff deployability rates, both across the organization and for individual TPS divisions;**

        this could include reallocating officers across divisions when needed, and more active management of TPS members who are on accommodation, or long or short-term disability.

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[68] The "at-scene" compliance rate for purposes of this project was calculated using response time data provided by TPS for only events where at least one PRU unit was dispatched to an event during the year 2019.

b) assessing how implementing the recommendations in Section A of this report would assist with improving response times.

7. Toronto Police Services Board (TPSB) direct the Chief, Toronto Police Service (TPS) to:

   a) evaluate the root causes for increasing clearance times, particularly for non-emergency, low priority (priority four to six) calls for service, and consider the impact on response times; and,

   b) in collaboration with TPSB, consider setting reasonableness thresholds for call for service clearance times by event type and evaluating/analyzing clearance times across divisions and event types to enhance performance measurement and operational monitoring at a high-level (e.g. divisional and/or TPS-wide).

8. Toronto Police Services Board, work in collaboration with the Chief, Toronto Police Service (TPS) to:

   a) review response time standards adopted as part of the Metropolitan Toronto Police Restructuring Task Force's "*Beyond 2000: Final Report*" and determine if any updates are needed;

   b) once a reasonable set of response time standards have been agreed upon and formally adopted, communicate them across the organization and routinely measure progress against those standards;

   c) consider publicly reporting out on its response time performance to increase transparency and accountability; and,

   d) consider its current response time calculation methodology and consider including the impact of call taker time and any other relevant factors, including items which may not be currently included.

9.	Toronto Police Services Board direct the Chief, Toronto Police Service (TPS) to determine if an automated technology solution can be implemented to improve completeness of information for officer arrival times (or increase compliance with officers pressing the "at-scene" button), so that arrival time is recorded for all responses and that all responses are included in the response time calculation.

Measuring Proactive and Reactive Time

TPS has set a goal of 70% of officer time for reactive service and 30% on proactive activities

In its 2021 and 2022 budget documents, TPS reported that a key strategic objective is to move to a 70/30 reactive/proactive service model. This model means that officers would aim to spend no more than 70 per cent of their time for reactive service (e.g. responding to calls for service and completing administrative tasks) and 30 per cent of their time on proactive activities, such as engaging with the community.

This model was adapted from a study published by the International Association of Chiefs of Police, and indicates that a general principle for the distribution of time for patrol units is 60 per cent of time towards completing operational (e.g. responding to calls for service) and administrative tasks, 30 per cent towards uncommitted time, and 10 per cent available as a flex factor. The study indicated that uncommitted time allows officers to engage in proactive activities.

Goal has not been measured since 2018

While TPS has communicated this goal as a strategic priority in its budget documents, it has not regularly assessed progress towards achievement. Management confirmed that the metric was last formally measured in 2018[69] and at that time, only four TPS divisions were close to the target. Management further indicated that no formal actions have been taken since to try to achieve that goal at the remaining TPS divisions.

Based on interviews with TPS members, we also noted that there was limited awareness of the strategy amongst front-line officers.

In order to ensure achievement of the 70/30 model, it will be important for TPS to regularly measure, assess any barriers/roadblocks, and take the necessary actions to resolve them. Better understanding and reducing barriers may also assist TPS with improving response times.

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[69] Management indicated that this target has not been regularly measured primarily due to staffing issues and competing project demands.

B. Improving and Further Leveraging Technology and Data

Collecting and using data is an important aspect of police work

In today's environment with the benefits available from technology, it is expected that organizations are leveraging technology and data to manage organizational performance and to improve efficiency.

The need for better data and data analysis was a theme found throughout this project, as well as in the *Audit of TPS 9-1-1 PSAP Operations* report. In the *Way Forward* report, TPS identified technology and information management as one of its strategic priorities, including using data analytics and evidence-based decision making.

TPS Information and Technology Command is leading a number of information technology projects to improve data capacity

TPS's Information and Technology Command is leading TPS towards change in this area. For example, in February 2022, TPS's Chief Information Officer reported to TPSB that TPS had equipped 92 per cent of the Service with body worn cameras and decommissioned three major systems in its information technology rationalization program, achieving over $500,000 of savings.

Progress has been made but much work lies ahead

Although progress has been made, much work still lies ahead, and a number of opportunities remain for TPS to move its technology programs forward. TPS should improve the collection and use of data to support more effective decision making and ensure efficient and effective use of PRU and other officer time.

We were limited in our ability to perform certain testing due to data issues

In completing our review, we encountered serious challenges with data. In reviewing calls for service, a lack of detailed data fields in the call for service system limited our ability to filter and analyze the entire population of calls for service for the event types we wanted to explore further. For example, to analyze whether certain calls for service involved people experiencing homelessness or mental health challenges, there was no easy way to filter the data in order to understand the nature of the calls for service and identify trends.

Given these challenges, it was necessary for us to primarily take a manual approach of reviewing a sample of calls for service, analyzing extensive documentation that included listening to caller audio files, and reviewing officer notes, reports and other documentation to better understand the nature of each call for service and the events that transpired.

Effective data analysis will be difficult without improvements to data

While detailed review of certain calls for service will sometimes be necessary to understand the nature of events, this approach is not sustainable for the necessary long-term, regular evaluation and analysis TPS will need to perform. It will not be possible for TPS to analyze and better understand the various calls for service it responds to, including those which may be appropriate for an alternative non-police response, without making the necessary improvements to its data.

We also encountered challenges with reliability in attempting to review staffing and disability and accommodation data.

Better data is needed for TPS to effectively carry out strategic change

Without better data that will allow for comprehensive analysis of the entire population, TPS will be limited in its ability to effectively implement important strategic initiatives, including alternative response delivery and ensuring PRU resources are used in the most efficient and effective way possible.

As illustrated in Figure 21, we've identified opportunities for TPS to improve the collection and use of data, and leverage technology which may help to divert certain calls for service, free up some call taker and officer time, and allow for better monitoring and more informed decision making. These opportunities include:

- improving time tracking and staffing data to better monitor resourcing;

- improving call for service data to better monitor how time is spent;

- assessing PRU response to frequently dispatched locations;

- opportunities to free-up officer time by automating and streamlining the reporting process; and,

- opportunities to use technological solutions for call for service diversion and to support call for service clearance.

Figure 21: Opportunities to Improve and Increase use of Data and Technology

Improving Time Tracking and Staffing Data to Better Monitor Resourcing

Improving Call-for-Service Data to Better Monitor How Time is Spent

What did we find?

Assessing PRU Response to Frequently Dispatched Locations

Opportunities to Free Up Officer Time by Automating and Streamlining Reporting Process

Opportunities to Use Technological Solutions for Call Diversion and to Support Call Clearance

B. 1. Improving Time Tracking and Staffing Data to Better Monitor Resourcing

Refining PRU Time Spent on Responding to Calls for Service

PRU time spent on calls for service can include report writing and other activities

Officers responding to calls for service are required to perform a number of steps relating to resolving and documenting the event. For example, officers may write and file police reports, complete forms and other paperwork, access databases and update notes relating to what they observed on-scene and actions taken by officers. These administrative notes and reports are often important as they can be used as legal evidence and can help TPS in understanding and monitoring performance.

Officers also spend time travelling back to one of the divisional police stations across the city to log into desktop computers to write and file reports, some of which are required by legislation and other necessary documentation, as well as to return phone calls and respond to emails.

During the call for service itself, officers may also perform a variety of activities such as mediating between parties, referring to other resources, investigating, etc.

Call for service system does not break down time on call

Management indicated that most reports will be completed prior to an officer clearing the call for service. However, the call for service system does not provide a breakdown on how much of the total time on call for service was spent addressing the call, and how much time was spent on administration, documentation, mediating between parties, etc. Capturing the time spent on these types of interactions may be helpful in analyzing clearance times.

Administrative Events

Administrative events in the call for service system can be broad and do not always clearly explain how time was spent

The call for service system also contains administrative event types (classified as priority eight) which are used by officers that respond to calls for service to record administrative functions that they perform in the course of their shifts. This includes activities such as following up on information received, finishing up reports, etc.

We noted that these administrative event types can be broad, and do not always clearly indicate what the officer did during that time. As illustrated in Table 6 below, there are multiple event types which appear similar and do not clearly explain how the time was spent by the officer.

Table 6: Administrative Event Types and Number of Events and Cumulative Hours Spent for January 2018 to July 2021

Event Type	Number of Events	Cumulative Hours Spent by PRU Units
Shift	175,000	45,000
Station – Information	80,000	53,000
Station – Activities	12,000	9,000
Station – Reports	15,000	18,500

TRMS System

The Time Resource Management System (TRMS) is TPS's time and attendance and resource scheduling application. TRMS is an administrative system, tracking members' time and attendance, as well as members' availability and schedules. TRMS is also the data source for calculating TPS member pay, leave banks, court, and paid duty attendance.

Issues with reliability of data in TRMS	Based on interviews held with TPS members, there are issues with data reliability. For example, each TPS member has a default profile based on their job profile in the system and if a member is temporarily re-assigned to other duties, for example, to work on a special project with an investigative unit, this is generally not reflected in TRMS and it will appear as if they worked in their base unit.
	TRMS also cannot accurately record maternity and parental leave as it calculates eight hours of leave on each timesheet, including weekends, when a member is on that type of leave. This can result in an overstatement of leave hours for reporting purposes.
TRMS does not include all time codes necessary to evaluate staffing resources	We also noted that TRMS did not have time codes to capture different types of reasons why PRU officers might not be deployable, such as being assigned to fill in for a station duty officer, being assigned to the officer general deployment program, participating in the general constable developmental program, and/or officers on temporary medical accommodation. This information is important in understanding the actual available complement of the PRU and what changes may be needed to ensure adequate coverage amongst divisions.
	During the course of our review, management reported that these time codes had been added to the TRMS system with the aim of improving data quality by the end of 2022.
	Quality Issues with Disability and Accommodation Data
Data quality issues limited our ability to review member disability and accommodations	During our review, we attempted to perform analysis of TPS members on short and/or long-term disability and accommodation, however encountered challenges with the integrity of the information in TPS's disability and accommodation management system.
	For example, we noted a variety of date issues (e.g. instances where the date of the incident/accident or the return to work date was listed as occurring after the first day of the claim), instances where the disability and/or accommodation type (e.g. mental health, respiratory etc.) field was blank, inconsistent data entry in certain free text fields (for example the term "left foot" was entered at least five different ways).

High quality data will be key to operational and wellness planning

Management also acknowledged that there are significant data reliability and quality issues with disability and accommodation information due to past inconsistent approaches, which included:

- The system was acquired in 1997 and records in the system prior to 2019 are generally inconsistent in terms of the data contained within them. There have been efforts made to convert historical physical files into electronic records, but this has mostly involved attaching imaged documents to a file with basic tombstone data added. Also, only a small portion of files have been imaged so far;

- Case management staff historically used the system sparingly for tracking cases and instead mainly used a free-text based module which cannot easily be analyzed;

- Non-medical accommodations were being tracked separately by a coordinator and may not always be reflected in the system; and,

- The system is not integrated with TRMS and only has limited integration with TPS's Human Resource Management System. This means that manual efforts are required to ensure the various TPS systems reflect the current status of a member (e.g. deployable or not).

  TPS management reported that recently it has relied on hand counts of TPS staff at divisions since there is no one reliable, central, source of staffing information.

Accurate and complete data will be important for TPS to further consider the impact of staffing on response times and in developing strategies to help both achieve response time targets and support the well-being of members.

TPS recently established a Workforce Planning and Insights unit which, among other functions, will oversee TRMS and other human resources related systems and applications.

More detailed time information would allow for enhanced decision making

More detailed and accurate time information would allow management to better assess how officers are spending their time and may help with more effective resource allocation and operational decision making. This information would also likely assist TPS with refining its 70/30 reactive/proactive metric and understanding clearance times discussed in Section A.2, so that a more accurate measure is obtained.

Recommendation:

11. Toronto Police Services Board direct the Chief, Toronto Police Service (TPS) to improve TPS data quality and reliability by:

   a) establishing more detailed time categories in the Intergraph Computer Aided Dispatch system, so that TPS can have more detailed information on how time is being spent on a per call for service basis. For example, this could include time spent on activities such as reporting, time spent during calls for service on investigative activities, and time spent on customer service/dispute resolution/mediation.

   In improving the usefulness of data for time tracking purposes, TPS should consider both the need to collect more enhanced, detailed information, and the operational demands on TPS members.

   b) improve the reliability of the data of the Time Resource Management System, including ensuring accurate reflection of leave hours, and members' work assignments;

   c) improve data reliability and quality related to members on disability and/or accommodation; and,

   d) consider opportunities for integration between staffing and accommodation/disability management systems, where appropriate, so that there is one clear, reliable source of information for making staffing, resourcing and wellness decisions.

B. 2. Improving Call for Service Data to Better Monitor How Time is Spent

Some call for service event types can be broad

Some call for service event types can be broad and cover a range of different scenarios. For example, as discussed in Section A.1 of this report, we noted that Check Address, which is one of the most commonly dispatched event types, can cover a variety of circumstances, from searching for stolen vehicles, to a request to check the well-being of an individual.

There are also a number of other broad event types. A few examples include:

- Unknown Trouble, generally used when a call taker hears screaming or a struggle on the call and is unable to discern the exact nature of the emergency;

- Advised, for calls for service where the call taker is providing referral information or advice; and,

- 311 Referral, for calls for service where a call taker refers the caller to contact 3-1-1 Toronto. Capturing the nature of the call for service (e.g. noise, animal complaint etc.) in an easy to analyze manner may be valuable information for both TPS and 3-1-1 Toronto and could assist in public education and awareness.

What transpires during calls for service not readily apparent without detailed investigation

Furthermore, the details of what transpired during a call for service cannot always be reliably or easily obtained, without listening to the caller audio, pulling the specific event chronology from the I/CAD system, obtaining the officer's memo book notes, and/or obtaining the report associated with the event, if one is available.

This limits TPS's ability to efficiently perform analysis that may assist in making effective operational decisions, such as understanding root causes of increasing response times, or calls for service with the potential to be diverted to an alternate response.

We recognize that some calls for service involving people experiencing homelessness or mental health challenges might still require a police response. However, collecting more readily available information on calls for service involving vulnerable people, such as those experiencing homelessness or mental health challenges, will be helpful in considering alternative responses and ensuring the best possible outcomes for these individuals.

TPS has designated event types, such as Persons in Crisis and Threatening Suicide, however TPS does not have a way to reliably or easily determine how many calls for service involve persons experiencing homelessness, or mental health challenges outside of these designated event types. This information could be helpful in considering alternative responses or resource planning. This may also provide insights that could be helpful to TPS in developing strategies for responding to calls for service involving vulnerable people where police will still be required to respond.

In collecting any personal health information, TPS will need to consider any relevant data collection and storage considerations, as well as compliance with applicable legislation, such as the *Personal Health Information Protection Act*.

Recommendation:

12. **Toronto Police Services Board direct the Chief, Toronto Police Service (TPS) to improve the collection and analysis of its call for service data so that it includes more detailed sub-categories or data fields for responding officers to indicate the nature of the calls for service. This will allow for more robust data analysis and provide data for calls for service that may be suitable for alternative responses. Specifically, this should include:**

   a) **sub-categories/data fields to better understand event types that are broad in nature. For example, Check Address, Unknown Trouble, Advised and 311 Referral;**

   b) **system flags/data fields to identify any calls for service that involved interaction with persons experiencing homelessness and/or mental health challenges, or any other factors that may be helpful in analyzing calls for service; and,**

   c) **text analysis on call for service notes in the call for service system to allow for more effective event analysis.**

B. 3. Assessing PRU Response to Frequently Attended Locations

TPS does not routinely examine data to identify repeat addresses of concern.

TPS does not routinely conduct analysis on locations where the PRU attend frequently, to better understand if police are needed, the nature of police attendance, and if the number of times police attend can be reduced[70].

PRU officers routinely visit some locations

We identified locations where the PRU have attended hundreds of times since 2018[71]. For example, we identified four addresses which appear to be fast food restaurant locations where TPS officers cumulatively attended over 1,000 times between January 2018 to July 2021 for Unwanted Guest calls for service.

Table 7 below provides examples of some of the top locations where PRU officers attended repeatedly for some of the event types described in Section A.1 of this report. We have anonymized the addresses to protect privacy.

Table 7: Illustrative Examples of Single Locations Where PRU Repeatedly Attended for Select Event Types

Event Type	Address Type	Number of Events Where PRU Attended (from January 2018 to July 2021)
Check Address	Hospital	809
Check Well Being	Toronto Community Housing Corporation building (multiple units)	72
Dispute	Toronto Community Housing Corporation building (multiple units)	69
Landlord & Tenant Dispute	Residential address	26
Noisy Parties	Residential building	65
Unwanted Guest	Restaurant chain location	333

<u>Check Address Calls for service at Hospitals</u>

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[70] We noted that TPS management have access to a dashboard which includes top locations for certain crime indicators, such as break and enters, auto thefts, and frequent offenders. Our report focuses on low priority, non-emergency events where PRU are being dispatched, which may not involve a crime or criminal charge

[71] Given the data limitations we describe in Section B of the report, we were unable to determine the nature or circumstances of the events, beyond the explanations provided by management. The "address type" descriptions in Table 7 were based on research of the address locations provided in the call for service data. For example, we noted that the addresses in the call for service data corresponded to locations where restaurant chain locations or hospitals were presently located. However, some of these locations were operating in busy intersections in close proximity to other businesses/locations so it is possible that some calls for service at these locations may relate to other matters.

Many Check Address calls for service relate to hospital visits for missing persons investigations

We noted hundreds of Check Address calls for service were associated with addresses of various Toronto hospitals. Management indicated that the majority of these calls for service related to TPS initiated events related to missing persons cases.

The *Missing Persons Act* allows police officers to make an urgent demand for records if they believe the institution has relevant records that would assist in locating a missing person, such as if and when the person visited the hospital. TPS missing persons procedures include visiting hospital locations to assist with missing persons searches. Management indicated that generally, hospitals will not release information over the phone. Further, the *Missing Persons Act* requires this information to be requested using a prescribed form.

Automated solution may help free-up PRU time

A technological solution, such as an automated portal with authentication, may help reduce hospital visits and free-up officer time for more priority calls for service. TPS could also consider if district special constables or other TPS alternative response units could be used to complete this task.

Recurring Events at TCHC Buildings

A number of recurring PRU visits occur at TCHC buildings

We noted a number of Check Well-Being and Dispute calls for service occurring at addresses which were associated with Toronto Community Housing Corporation (TCHC) properties[72]. TCHC is the largest social housing provider in Toronto.

As an extension to the findings in Section A.1 of this report, there may be opportunities for TCHC, in collaboration with TPS and the City, to determine alternative strategies to resolving these repeat calls for service to free-up PRU officer time for other activities. While there are calls for service that will still need to be addressed by TPS, there may be opportunities to free up PRU time in certain situations.

TCHC is already performing wellness checks for some residents during COVID-19

For example, in 2020, TCHC reported having performed over 19,000 wellness checks by telephone and door knocks with all households identified as vulnerable. TCHC further reported having identified and supported over 1,000 households that needed help with daily tasks such as food and medicine delivered to their home.

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[72] In May 2021, City Council authorized the City Solicitor to establish the Toronto Seniors Housing Corporation (TSCH) to manage social housing designated for seniors in the City of Toronto. Council also directed the Boards of TCHC and TSHC to negotiate and arrange for the transfer and assumption of the operational responsibility of 83 seniors-designated buildings owned by TCHC ([Link to Council Decision](#)). Some of the TCHC properties we identified during our review are included as part of those seniors-designated buildings.

TCHC also operates a Community Safety Unit (CSU), which include special constables. According to the CSU webpage, staff work directly in the communities, conducting patrols and site visits, responding to calls at TCHC properties, helping to resolve complaints and disputes, building relationships within the communities, and partnering with other law enforcement, fire and social service agencies.

TCHC may be able to further leverage these models to address certain low-risk, non-emergency calls for service (e.g. Dispute, Check Well-Being, etc.) at TCHC buildings where PRU would have normally attended.

Community based mediation may help reduce PRU visits

The City and TCHC should also consider if community mediation models may help address some of these calls for service. For example, there was a pilot running at Ottawa Community Housing buildings aimed at helping residents resolve their problems proactively without external intervention (e.g. police or by-law enforcement). By supporting people in the community to build their own skills, the program aims to help residents address issues proactively.

<u>Working with Businesses to Address Unwanted Guest Calls</u>

Many repeat calls for service for unwanted guests occur at restaurant chain locations

There were hundreds of repeat unwanted guest calls for service at locations which appeared to be restaurant chain locations. TPS indicated that while they have been working with management at some locations to come up with strategies, these calls for service often relate to persons experiencing homelessness and are recurring.

As highlighted in Section A.1, pursuing alternative non-police strategies may help address some of the underlying causes in these situations and reduce PRU attendance.

City of London CIR team model may present lessons worth considering

We noted that the City of London, Ontario, operates a Coordinated Informed Response (CIR) team composed of City of London employees (including by-law officers), London Police Services, and the community outreach agency London CARES, who offer support and services to the people of London experiencing homelessness in the city. In addition to working with individuals experiencing homelessness, the City of London reports that the program is available to help local businesses handle issues and challenges that arise due to the city's street involved individuals.

Businesses looking for support can contact the team and London Police Services to register their consent. Businesses will then display a sticker in their front window which indicates to the team that they have permission to enter the property and help address issues.

Recommendations:

13.   City Council request the City Manager, and the Toronto
        Police Services Board direct the Chief, Toronto Police Service
        (TPS) to work in collaboration along with other agencies to:

        a) analyze low priority, non-emergency calls for service
            (e.g. Unwanted Guests, Check Address etc.) to
            identify instances where officers are repeatedly
            attending the same locations; to determine if an
            alternative resolution can be implemented. In
            developing solutions, TPS should consider if call for
            service volume can be reduced through
            implementing Recommendation 1 of this report;
            and,

        b) for calls for service at hospitals related to missing
            persons inquiries, consider if a technological
            solution, such as an automated portal with
            authentication, may help reduce hospital visits and
            free-up officer time for more priority calls for service.

            This evaluation should consider legislative
            requirements and consultation with the Ministry of
            the Solicitor General and other stakeholders, as
            required.

14.   Toronto Police Services Board direct the Chief, Toronto
        Police Service (TPS) and City Council request the City
        Manager to work in collaboration with the President & CEO,
        Toronto Community Housing Corporation (TCHC) to
        determine if strategies can be implemented to reduce
        instances of Priority Response Unit officers repeatedly
        dispatched to the same locations within TCHC properties.

B. 4. Opportunities to Free-Up Officer Time by Automating and Streamlining Reporting Process

Hard-Copy Documentation Processes

Officers are required to carry hardcopy memo books to document call for service details

TPS procedures require officers to carry memorandum books (known as memo books) or unit-approved notebooks while on duty to record notes of arrests, investigations, significant events and the activities that occur during their shifts. Officers take notes by hand in traditional paper memo books; a practice which has been occurring for many years in Canada.

Officers are required to scan and attach their notes to a copy of the report when investigating a major case, making an arrest, investigating a matter likely to be prosecuted, or when deemed necessary for other operational reasons. Past memo books are filed and stored by the division where the officer is currently working. If needed in the future, it can be a time consuming and burdensome process to physically retrieve and manually review these memo books.

TPS officers also complete a variety of reports for certain calls for services

In addition to keeping memo book notes, officers are also required to complete separate reports for some event types, for example, intimate partner violence, vehicle thefts, and hate/bias crimes.

Manual note taking may increase time spent on a call

Manual note taking is an inefficient process that can increase time spent on a call for service and may delay officers from attending other pending calls for service.

In addition, even though some officer notes are scanned into the records management system, because they are in handwritten form, and in some cases illegible, the notes cannot be easily analyzed against other sources of information. This limits their usefulness for insights that can potentially be used for generating police intelligence and other performance management purposes.

Redundancies in Reporting

Officers are entering the same information into multiple places

We also identified potential redundancies in reports generated by officers, whereby officers can sometimes be required to enter the same information into multiple systems.

For example, officers enter details about a call for service and what transpired in their memo books, but then also create reports for some calls for service with some of that same information that has already been recorded in the memo book. In addition, some officers may also choose to enter notes about the call for service into the call for service system.

Digital Officer Program

Digital Officer program aims to digitize note taking and reporting

In 2017, as part of the recommendations in the *Way Forward* report, TPS outlined the strategy for its Connected Officer Program, aimed at providing front-line officers with smart mobile devices to access police data and information, including an electronic memo book to replace hard copy memo book notes.

Since then, that initiative has evolved into the Digital Officer Program, which is more encompassing, and aims to enhance the experience of how officers use technology. This includes equipping officers with the physical devices, such as smart mobile devices and body worn cameras, and software needed to maximize their capability and utility.

While progress has been made, expected completion is still years away

Management reports that while over 2,600 officers have been issued mobile phones, moving to an effective electronic memo book solution will require a remediation/change of TPS's records management system and the development of platforms to automate and mobile-enable TPS processes, in order to fully realize the benefits of moving away from paperless processes.

The expected timeline on completing this initiative is still several years away.

Several other police agencies in Ontario have reported that they have or are in the process of transitioning from paper-based notes to an electronic platform. It may be helpful for TPS to consider if any "lessons-learned" can be leveraged from these projects to assist in helping move forward the Digital Officer program.

In order to achieve value-for-money and the most possible benefit, it will be important for TPS to ensure that any electronic memo book solution it implements is capable of integrating with its record management and other TPS systems. However, it is also important to recognize that TPS has been pursuing an electronic memo book solution for a number of years and that a more accelerated timeline may be needed to address the inefficiencies created by a manual memo-book system.

Recommendation:

15. **Toronto Police Services Board direct the Chief, Toronto Police Service (TPS) to:**

    a) **accelerate the Digital Officer program and electronic memo book initiative, including any interfaces with other records management and reporting systems, to create efficiencies in how front-line officer time is spent.**

    b) **consider any best practices that can be leveraged from other jurisdictions, and if any aspects of a digital memo book can be implemented on a more short-term basis, even if full integration is not achieved.**

B. 5. Opportunities to Use Technological Solutions for Call for Service Diversion and to Support Call for Service Clearance

Technology and automation may help free up officer and call taker time	Historically, many calls for service were addressed by dispatching a PRU, or other officer, to a location to investigate and address the situation. For certain event types, TPS currently uses strategies to avoid on-scene call for service resolution, such as through the Citizen Online Report Entry (CORE) online reporting system or calls for service handled through phone by the Primary Report Intake, Management and Entry Unit.
	However, there may be opportunities for TPS to leverage technology and automation further to reduce the number of calls for service where a PRU officer has to attend on-scene, and to improve the efficiency and effectiveness of collecting information relating to calls for service.
Digital Platform and Transformation Program aims to create digital workflows	Management reported that TPS has begun to explore new digital strategies that may help divert calls for service from front-line resources, through its Platform and Transformation Program. This program aims to use platform technologies to improve citizen services and front-line officer tools, while reducing service delivery costs.
	Digital workflows and strategies could help TPS to also collect more data and make more informed decisions on how to best use limited PRU officers' time. Examples of how these digital strategies can be deployed are described below.
	Live Video Technology
Live video technology may help in reducing the number of in person PRU calls	Addressing some calls for service through live video technology may be a way for TPS to avoid sending PRU officers on-scene to certain calls for service and free up officer time. This may be useful for low-priority, non-emergency calls for service.
Other police agencies are piloting this technology	The Winnipeg Police Service has established a Virtual Police Response Unit that enables members of the public to engage with an officer through video using a smartphone or tablet, and allows officers to conduct virtual, remote assessments. The City of Winnipeg reported that Virtual Police Response reduces the time significantly from a report being filed to an officer being dispatched to the scene, saving critical time in the investigative process.
	Online dispute resolution, such as through the use of video calling, could be another digital strategy considered to help resolve disputes (for example where there is not an active dispute involving violence and/or a weapon between neighbours and other parties without the need to send officers).

Automating call for service information collection may assist with more effective and efficient response	Developing tools to allow callers to provide as much information as possible, and to allow two-way interaction with TPS without the need to speak to a call taker, including the need to call TPS back to provide updates, may assist with more effective and efficient call for service response.
	This could include the ability for a caller to upload details, including documents or photos, relevant to the call for service, provide updates on the situation they are facing, and to cancel a call for service if the situation no longer exists, without speaking to a call taker. Automated status update texts, including notifications for when officers are on the way, could also help reduce instances of callers calling TPS back. These calls can sometimes tie up the 9-1-1 emergency line when callers call back to ask when police will arrive.
"Gone on arrival" is a common occurrence for TPS and ties up PRU officer time	This may help save officer and call taker time that can be redirected towards more high priority, emergency calls for service and reduce "gone on arrival", which are a common occurrence for certain calls for service. For example, if a caller calls to report an unwanted guest and the unwanted guest has left before police arrived, the caller could conveniently report this update without taking up time of the call taker, and PRU officers would no longer need to attend.
	PRU officers must generally still attend such a call for service (if the caller does not call with an update or the call taker is not able to reach the caller to confirm if the situation still exists), even if it is several hours later and the situation no longer exists.
Over 103K events or 66K hours spent to clear "gone on arrival" from 2018 to July 2021	From January 2018 to July 2021, there were over 103,000 events where at least one PRU officer arrived on-scene and marked the call for service with a "gone on arrival" status. Approximately 66,000 hours were spent to clear these calls for service[73]. Of these events, over 46,000 of these calls for service (44 per cent) were for low priority events, non-emergency events (priority four to six).
$2.4M cost in attending events when individual "gone on arrival"	Using the salary of a fourth class constable, we estimate that at least $2.4 million in PRU gross salary costs have been incurred as a result of attending these events when the individual was gone on arrival from January 2018 to July 2021.

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[73] Includes events where at least one PRU unit attended. Total hours are time spent by units, not by individual officers. As a result, this number is likely conservative since one unit may be composed of multiple officers.

For example, as shown in Table 8 below approximately 7,500 calls for service relating to Unwanted Guest events, and 1,500 calls for service relating to Noisy Party events from January 2018 to July 2021 had a "gone-on-arrival" status. Generally, unless the person who requested assistance calls back to cancel these calls for service, officers must still attend active calls for service that have not been cancelled.

Table 8: "Gone on Arrival" Calls for service for Noisy Parties & Unwanted Guests from January 2018 to July 2021 and Time on Call by Unit

Event Type	Number of Events	Time on Call (by unit)	Percentage of Events Marked as "Gone on Arrival"*
Noisy Parties	1,500	760 hours	15%
Unwanted Guests	7,500	4,400 hours	19%

*Based on calls for service where the I/CAD system showed that at least one PRU officer arrived on-scene. Due to system limitations we described in Section A.1 the "at-scene" status of officers is not always marked in the call for service system

Opportunities for increased online self-reporting

Increased use of online self-reporting could also potentially reduce on-scene PRU visits. In the *Way Forward* report, TPS indicated that while TPS has an existing online reporting portal, the existence of the portal is not well known, and the option is underutilized. Currently, only a limited number of event types are eligible for online reporting using TPS's online reporting system, however there may be opportunities to expand this list.

We recognize that certain event types may still require an on-scene police resource at some point in the investigation process, however, there may be opportunities to reduce the overall use of on-scene officers, especially in the initial processing and investigation process.

Some police jurisdictions allow for online report of an expanded list of situations

We found that other police jurisdictions in Ontario allow for online reporting of an expanded list of situations. For example, the Barrie Police Service allows the public to report certain "disturb the peace" (i.e. unruly public behaviour) bullying and trespass to property incidents.

In addition, while TPS allows for reporting of theft and other events where the value of the loss is under $5,000, other police jurisdictions in Ontario have set higher limits. For example, the Ontario Provincial Police allows the public to report theft events regardless of value, and the York Regional Police Service limit is under $10,000.

Recommendations:

16. Toronto Police Services Board direct the Chief, Toronto Police Service (TPS) to:

   a) continue to pursue digital strategies, such as video calling, as an alternative to front-line Priority Response Unit officer response and consider if there are any event types that can be addressed remotely without an on-scene police response.

   In doing so, TPS should assess if there are any legislative or privacy requirements that would need to be examined in relation to increased use of technology such as video capability.

   b) review event types and consider if there are any additional event types that the public can report through the online reporting system or if current reporting criteria (e.g. dollar value limits) can be expanded.

17. Toronto Police Services Board direct the Chief, Toronto Police Service (TPS) to consider as part of its Digital Platform and Transformation Program, an interface for callers to communicate with TPS call takers and provide additional information, and provide confirmation, for certain event types, if a situation no longer exists, such as that an unwanted guest has gone or a noisy party has concluded.

C. Increasing Integration and Information Sharing

Toronto has developed SafeTO: A Ten-Year Community Safety and Well-Being Plan

In 2021, City Council approved *SafeTO: the City's Ten-Year Community Safety and Well-Being Plan*. SafeTO, which was also endorsed by TPSB, provides a roadmap for how the City and social systems that serve the people of Toronto, such as community services, healthcare systems, education systems, justice systems, police and business, can work collaboratively across different sectors and across governments to support community safety and well-being. City staff, working with TPS, TPSB and other partners also developed the SafeTO Implementation Plan.

The plan highlights that growing evidence calls for proactive, multi-sector responses guided by a unified vision and a set of agreed upon priorities. One priority action outlined in that plan is to strengthen multi-sector collaboration through partnership and integrated investments.

TPS is a key partner in community safety and well-being of the people of Toronto, and should continue to work with other stakeholders

As highlighted in Section A of this report, while TPS receives a variety of calls for service from the public, not all are situations that TPS can effectively resolve on its own. There are further opportunities for TPS and the City as key partners and stakeholders in the well-being and safety of the people of Toronto, to increase collaboration with each other and other agencies to continue to work together to improve outcomes.

Not only will this ensure that residents receive the supports they need and are assisted by the appropriate service or agency, but in turn, this will also help TPS in directing its focus towards more priority police matters and better use its resources.

C. 1. Increased Integration and Collaboration with the City

Working Together with the City on Mental Health Pilots

Both the City and TPS have launched mental health pilots

As mentioned in Section A.1 of this report, we noted some calls for service related to mental health and homelessness are attended by front-line police, and that a preventive approach and wrap-around supportive responses by the City of Toronto and other agencies would likely provide more effective overall outcomes for these individuals and communities.

The City launched the Toronto Community Crisis Service in March 2022 and will explore the use of non-police led crisis response teams for certain calls for service involving mental health. At the same time, TPS has also launched its own pilot, the Gerstein Crisis Centre call for service diversion pilot, which includes diverting certain non-emergency mental health-related crisis calls for service that meet specific, non-imminent risk criteria and which may benefit from a non-police mental health crisis response, to trained mental health crisis workers, instead of police officers.

Joint collaboration and evaluation will be important in evaluating outcomes

While there are opportunities for synergy between the two pilots, there is also the potential for possible overlap, making it necessary for there to be careful joint evaluation and collaboration. Pilot evaluation strategies should include considerations regarding what data will be available to review, how it will be reviewed, and who will be able to access the data.

For example, we noted that the City and TPS have not conducted analysis of actual TPS call for service data to determine the proportion of calls for service received by TPS that would be suitable for resolution by the pilot. Management at the City indicated that the number of possible calls for service that could be diverted was based on Mobile Crisis Intervention Team (MCIT) figures and comparable examples in other jurisdictions.

Also, in deciding next steps for both pilot programs, TPS and City should consider the recommendations for alternative responses in Section A.1 of this report.

> **Recommendation:**
>
> 18.   City Council request the City Manager, and the Toronto Police Services Board direct the Chief, Toronto Police Service (TPS) to work in collaboration to:
>
> > a)   conduct joint program assessments of the outcomes from current mental health call for service diversion pilots, including the Gerstein Crisis Centre call for service diversion pilot, and the City's Toronto Community Crisis Service, to assess the effectiveness and outcomes of these programs;
> >
> > b)   ensure mechanisms are in place so that both the City and TPS have access to the necessary data, including TPS call for service data (e.g. number of calls for service received, diverted) and relevant call for service details to complete effective evaluations of the current and any future pilots; and,
> >
> > c)   ensure planning for future pilot programs are coordinated, involve both the City and TPS, and consider the recommendations from Section A.1 of this report, to ensure they are achieving the desired outcomes in the most efficient and effective way.

Opportunities to Automate and Better Track FOCUS and Direct Community Referrals

FOCUS Table and Direct Community Agency Referrals

FOCUS program is a collaborative approach to improving community well-being

Furthering Our Community by Uniting Services (FOCUS) is a community-based approach co-led by the City of Toronto, United Way of Greater Toronto and TPS, that aims to reduce risk, harm, crime, victimization, and improve community resiliency and well-being.

TPS's Community Partnership and Engagement Unit (CPEU) coordinates the aspects of the program relating to TPS.

The model brings together community agencies at a weekly situation table to provide a targeted, wrap-around approach to vulnerable individuals, families and places that are experiencing increased levels of risk in specific geographic locations. There are six FOCUS tables across Toronto, with catchment areas covering 13 TPS divisions.

The FOCUS process is based on referrals. For example, TPS members may identify individuals with need for supports and then make a referral to CPEU or divisional TPS FOCUS representatives. The FOCUS representative will then conduct follow-up inquiries to determine if they can bring the issue to a FOCUS table.

To qualify to be brought to a FOCUS table, a situation must meet certain criteria, including demonstrating acutely elevated risk, which is a high probability that the situation is or will eventually become an emergency involving social disorder, crime, harm or victimization. The situation must also require a multi-agency, wrap-around response.

For situations that do not meet the FOCUS criteria, or for divisions not covered by a FOCUS table, a TPS FOCUS representative can connect with a FOCUS community agency and make a direct referral to that agency.

FOCUS program may help free up PRU resources

The FOCUS program appears to be a potential solution to help free up front-line PRU resources through identifying situations where a non-police response would help reduce frequent/repeat contacts. An independent study[74] of the FOCUS program showed a 68.75 per cent reduction in the rate of police contacts during a two year post FOCUS table data follow-up period. An example provided by TPS is highlighted below.

Example of FOCUS outcomes
TPS management reported that officers attended a call for service for a family dispute where there had been 44 previous calls for service. They dealt with the initial call for service and recognized that the mother needed social services to help her with her family, not necessarily the police. The officers submitted the FOCUS referral to connect the family to some services and were successful. Since the FOCUS referral, police have not yet had to return to that location.

[74] We have not reviewed or verified the results or numbers of this study.

<u>Automating FOCUS and Direct Community Referral Process and Analyzing Data</u>

Automation could help increase FOCUS referrals

Currently, FOCUS and direct community agency referrals are made by TPS members contacting FOCUS representatives via phone or email. Divisional specific FOCUS data is largely captured manually in spreadsheets at TPS divisions.

TPS could consider automating the process to generate more referrals, such as through the use of flag /fields on calls for service, or a digital application, that automatically notifies CPEU or the divisional rep of the circumstances of the call for service that may potentially be suitable for a FOCUS table or direct referral.

In addition, a more proactive approach to referrals through increased data analysis at a TPS wide level, such as through analyzing call for service data for keywords or repeat dispatched locations (as highlighted in section B.3 of this report), may also be helpful.

<u>Other Community Referrals</u>

TPS members can also make community referrals outside of the FOCUS program

Apart from formal referrals through the FOCUS table or partner agencies, TPS members can also provide referrals to community support programs and agencies. For example, TPS's Mobile Crisis Intervention Team (MCIT) program provide referrals to community agencies for people that have had an interaction with the MCIT.

Management also reported that TPS is adding community referral training to courses at the Toronto Police College and directly to officers, to help them explain and make referrals to community supports in the course of their interactions with the public.

In its Mental Health and Addictions Strategy presented at the January 2022 TPSB meeting, TPS reported that it is working towards developing a process for capturing all community referrals, including those made directly by TPS officers, and is developing information management structures to support an application or digital platform for members to make referrals.

Recommendation:

19.   Toronto Police Services Board direct the Chief, Toronto
      Police Service (TPS) to:

      a)   consider automating and streamlining the process
           by which TPS members make and track referrals for
           community-based services, including the Furthering
           Our Community by Uniting Services (FOCUS) table
           and other community referrals, with the goals of
           making the referral process easier for officers,
           preventing further repeat calls for service requiring
           Priority Response Unit officer response, increasing
           diversion to supporting organizations, and improving
           the outcomes and quality of service to the public.

      b)   with these same goals in mind, TPS to also consider
           performing analysis of call for service data at a
           corporate level to identify trends or possibly
           situations that may also be suitable for referral.

Reducing Police Hospital Wait Times for Mental Health Apprehensions

Mental Health Act governs police apprehensions of persons in crisis

In Ontario, the *Mental Health Act* permits police officers to apprehend individuals suffering from a mental disorder under certain conditions that include if the officer has reasonable grounds to believe that a person is acting or has acted in a disorderly manner, and has reasonable cause to believe the person is a threat or at risk of causing harm to themselves or others[75]. Under the act, when police officers make apprehensions, they must take the person in custody to be examined by a physician, which usually occurs in a hospital setting.

Police officer must retain custody of the person until hospital accepts care

The officer must wait with the apprehended person and retain custody until a person designated by the hospital as authorized to accept care does so.

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[75] The full conditions can be found here: Section 17 - Mental Health Act. In addition to police officer initiated apprehensions, the Mental Health Act also allows for other circumstances where police may be required to apprehend and transport an individual. For example, some apprehensions may be initiated at the request of a physician or justice of the peace or result from a community treatment order. As part of the community treatment order process, under certain circumstances police officers may be required to transport individuals to specific facilities.

PRU officers can spend hours in hospitals waiting

This can take hours, and every minute a PRU officer waits in a hospital waiting room reduces the time that officer is available to support public safety efforts, reactively and proactively, in their assigned divisions.

Using Alternative Police Response Units

District special constables may help free up PRU time, but capacity is limited

TPS has recently begun using its district special constables to wait at hospitals and free up PRU officers to respond to other calls for service, which helps to some extent. While only a limited number of district special constables are available, expanding their use could provide another alternative to free up PRU officer time.

Impact of Hospital Wait Times

Based on mental health apprehension data provided by TPS, from January 2018 to July 2021, the average wait-time for custody transfer to a hospital official was over 1.5 hours, with approximately 30 per cent of apprehensions resulting in waiting times of two hours or more. Table 9 breaks down wait time data further.

Based on the salary of a fourth class constable, we estimate that at least $1.8 million in PRU gross salary costs have been incurred as a result of hospital waits from January 2018 to July 2021[76].

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[76] Based on hospital wait time data provided by TPS for PRU officers. The data was generated from reports provided by officers on how long they waited, relating to mental health apprehensions. Given data reliability issues, we excluded events where the reported waiting time was 0 minutes or greater than 600 minutes since it was unclear if these were outliers. Also, the hospital location visited was not always indicated for each apprehension and in a small number of cases, it appeared that officers waited at non-hospital based, health-care facilities.

This number is likely conservative given that wait-time data provided was only available on a per-event basis, instead of per-officer basis. In some occasions, more than one officer will wait with an apprehended person and therefore the cumulative total number of hours spent waiting, and salary costs are likely greater than what is presented in this report.

Table 9: Hospital Wait Times from January 2018 to July 2021 for PRU Officers

Wait Time	Number of Apprehensions	% of Apprehensions	Total Time at Hospital in Hours	Minimum Wait Time (mins)	Maximum Wait Time (mins)
Less than 60 mins	8,352	26%	5,112	5	55
Greater/equal to 60 and less than 120 minutes	13,617	43%	17,584	60	115
Greater/equal to 120 and less than 180 minutes	6,428	20%	14,361	120	175
Greater/equal to 180 minutes	3,589	11%	13,352	180	600
Total	31,986	100%	50,409		

Officers transport apprehended persons to Toronto hospitals, sometimes outside Toronto

Based on the data we reviewed, we also noted that officers transported individuals to a variety of different hospitals across the City. In some cases, we noted that officers drove to hospitals outside Toronto, including Brampton, Markham-Stouffville and Richmond Hill.

Hospital Delays Are Not A New Issue

Hospital delays are not a new issue or unique to TPS

Hospital delays are not unique to TPS alone. Toronto Paramedic Services also reported that it continues to experience critical system workload pressures due to delays in transferring ambulance patients to the care of the hospital and that in-hospital times for paramedics waiting to transfer patients at hospitals is the most significant factor contributing to emergency medical system pressures.

Toronto Paramedic Services also faces hospital offload delays

In 2019, Toronto Paramedic Services management reported that ambulance offload times were approximately 1 hour, 90 per cent of the time.

This well exceeds the "30 minutes, 90 percent of the time" standard recommended by the *Hospital Emergency Department and Ambulance Effectiveness Working Group*, a provincial working group commissioned by the Province of Ontario in 2005 to advise the Ontario Ministry of Health and Long-Term Care (now the Ministry of Health) on ambulance offload times in emergency departments.

In her 2010 report, the Auditor General of Ontario also highlighted issues with ambulance offload delays. Her review noted instances where ambulance crews had to wait for over an hour—and in some cases up to three hours—for their patients to be attended to by the emergency department.

Preventative Approaches

Preventing mental health apprehensions can result in more effective outcomes for all

A preventative approach that looks to minimize the number of mental health apprehensions, such as through the Toronto Community Crisis Service pilot, may also help to alleviate the pressures on PRU officers tied up in hospital waiting rooms so that they are available to respond to other pending priority calls for service, and at the same time, help provide better outcomes for residents and community members.

With the launch of the Toronto Community Crisis Service and TPS's Gerstein 9-1-1 Crisis Call for service diversion pilot project related to mental health, it is possible that some mental health apprehensions may be prevented. This is an important indicator that should be measured and included in the evaluation of these pilots.

Increased officer training aims to provide alternatives

TPS reported it is pursuing increased officer training and awareness about community support programs. The aim is to help provide officers with the information necessary to develop confidence in explaining community supports to persons in crisis, in order to obtain their consent for referral and engage these agencies during a crisis, rather than apprehending the individual under the *Mental Health Act.*

Need for Community Supports

More community resources needed

As mentioned in Section A, the lack of mental health resources in Canada may be a contributing factor to more mental health apprehensions and resultingly, PRU officers waiting in hospitals.

According to the Ontario Human Rights Commission, *"…starting in the 1960s, under a policy of deinstitutionalization, people were moved away from long-term psychiatric facilities with the goal that they would be provided services and supports in the community…Ultimately, the shift from institutional to community care was marked by a lack of community supports, such as affordable, safe housing and a lack of accountability for the care of people with severe mental health disabilities[77]."*

This is a systemic issue that will require a collaborative approach with the provincial government, hospitals, TPS, and other agencies.

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[77] From the 2014 Ontario Human Rights Commission publication *"Policy on preventing discrimination based on Mental health disabilities and addictions"* Link to publication

Patient distribution logic system may be helpful

Management reported that while officers are trained to phone ahead to the hospital and provide the circumstances of the apprehension, there is no formal system in place in which information can be sent to hospitals ahead of time.

TPS also does not have a formal system in place to identify the optimal hospital for an officer to visit, for example in consideration of factors such as wait and travel times. Toronto Paramedic Services, which regularly transports individuals to hospitals as part of its mandate, utilizes patient distribution system software that assists with distribution of patients to the most appropriate hospital based on certain factors including the severity of the illness/injury, services required, and hospital proximity[78]. TPS may want to explore if a similar system might help alleviate some wait time pressures.

Joint TPS hospital liaison committees work to resolve hospital wait time issues

Management advised that TPS has adopted some of the best practices from a framework developed by a provincial task force comprised of experts from across the healthcare and policing sectors. This includes establishing police-hospital liaison committees with some hospitals that work to address issues faced by both the police and the health care service providers. Management also reported that these hospitals have developed hospital specific transfer of care protocols in collaboration with TPS.

Several hospitals that officers visit do not have committees or protocols

However, committees have not been formed for several of the hospitals TPS routinely visits in Toronto. Establishing police-hospital liaison committees at these locations would formally establish communication or escalation protocols that may help TPS and hospitals effectively address concerns.

Dedicated offload pilot may be helpful

Management has also reported that one hospital recently received funding for an emergency department offload mental health nurse pilot position. The offload nurse works to expedite the transfer of care process by taking over care of the apprehended person until the hospital accepts responsibility, and police are generally only required to stay past the offload time in situations where there is violence.

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[78] Documentation provided by Toronto Paramedic Services indicated that in certain cases, paramedics may be required be transport patients to a particular hospital (e.g. due to legislative requirements).

TPSB should consider pursuing legislative changes

In addition to strategies to reduce wait times, it may also be good timing for TPSB, in consultation with TPS and other stakeholders, to request changes to the legislation for mental health apprehensions, particularly regarding the requirement for a police officer to retain custody while waiting at hospitals.

In considering its request for potential changes, TPS and TPSB should also consider the impacts of any findings and recommendations from any relevant prior external reviews, as applicable (e.g. coroner's inquests, etc.)

Recommendations:

20. **Toronto Police Services Board direct the Executive Director and Chief of Staff, Toronto Police Services Board Office, in consultation with the Chief, Toronto Police Service, and other stakeholders as necessary, to request changes to the legislation for mental health apprehensions regarding police custody while waiting at hospitals.**

21. **Toronto Police Services Board direct the Chief, Toronto Police Service (TPS), in consultation with the Chief, Toronto Paramedic Services and the Chief Executive Officers (or other appropriate executive liaisons) of Toronto hospitals to:**

    a. **leverage technology and/or the use of data to identify the most appropriate hospital for an officer to transport an individual in custody, with the view of minimizing wait times and travelling the least possible distance.**

    b. **develop police-hospital liaison committees and transfer of care protocols with all hospitals where TPS transports apprehended persons, to minimize wait times and develop protocols to create a workflow which will benefit both TPS and the hospitals.**

Working Together with 3-1-1 Toronto on Call for Service Diversion

TPS and City have considered strategies for call for service diversion to 3-1-1 Toronto

For some people, contacting the police through 9-1-1 has been their "go-to response" for assistance, including for non-emergencies. This is in part because 9-1-1 is free and an easy number to remember, they may not be aware of other numbers such as 3-1-1, and/or they may not be satisfied with the City's response or may be referred by the City back to police.

Management indicated that police may be dispatched to these non-emergencies because if they don't respond and something goes wrong as a result of that decision, there could be potential legal risks for TPS.

Joint *Non-Emergency Calls and Dispatch Steering Group* was established

As a result of the *Way Forward* report, a joint *Non-Emergency Calls and Dispatch Steering Group* between the City and TPS was set up with the goal of identifying the appropriate agency/organization to respond to non-emergency calls. The expected impacts were an increase in calls to 3-1-1 Toronto, and increased response by City divisions (MLS, and Transportation Services) to calls for service that would have otherwise gone to police.

Shared response model launched in 2018

One of the deliverables of the steering group was a non-emergency calls intake and response matrix to identify appropriate responder (either TPS or the City) for different types of calls for service. For example, the matrix included call types such as Animal Complaints, Check Traffic Signals, Traffic Obstruction and which agency would respond. The shared response model was launched in June 2018.

Examining Call Volumes Under the Shared Response Model

Calls for service assigned to the 3-1-1 Referral event type have not seen significant decline

Calls for service where TPS call takers refer callers to 3-1-1 Toronto are captured under the 311 Referral event type[79]. As highlighted in Table 10, since 2018, the number of calls referred to 3-1-1 Toronto have not seen significant decline since the shared response model was developed. If the shared response model were functioning as intended, one expected outcome would likely be a general decline in the number of times TPS call takers have to refer callers to 3-1-1 Toronto.

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[79] This only includes calls for service received through TPS's Communications Services unit and classified by call takers using the 311 Referral event type. The public can also call 3-1-1 Toronto directly to open service requests about City related programs and services and these would not be tracked by TPS. Service requests made by residents directly to 3-1-1 Toronto were outside of the scope of our review.

As discussed in section B.2, this is a broad category and there is no way to easily identify the reason for the call for service without reviewing the call for service documentation or listening to the call audio. Understanding why callers still need to be referred to 3-1-1 Toronto may help provide insights to uncover if the shared response model is operating as intended.

Table 10: Calls for Service Assigned to the 311-Referral Event Type from January 2018 to July 2021

Event Type	2018	2019	2020	Jan to July 2021 (partial year)
311 Referral	4,580	4,880	9,090	3,020

<u>3-1-1 Call Volumes</u>

3-1-1 Toronto management reported that from 2018 to 2021, over 56,000 calls received through the 3-1-1 Contact Centre were transferred to TPS's non-emergency line by 3-1-1 customer service representatives. However due to system limitations, the nature of the calls was not tracked. In November 2021, management reported that 3-1-1 upgraded to a new system and is now able to track the nature of these interactions.

Documenting and analyzing the reasons why callers are transferred to TPS may provide insights to help assess the effectiveness of call-diversion strategies and if roles and responsibilities are fully understood by staff.

<u>Ensuring Roles and Responsibilities Are Clearly Understood and Communicated</u>

City and TPS may want to assess if roles and responsibilities are clearly understood

We noted that the protocol between 3-1-1 Toronto and TPS may not always be clearly understood by staff. We reviewed complaints received by 3-1-1 Toronto from the public. In some cases, members of the public appeared to express displeasure about being re-directed between TPS and 3-1-1 Toronto for issues they required assistance with. The following are some examples from 2020 and 2021 quoted directly from 3-1-1 Toronto's complaint log:

- *"...Called about the need for a sign to caution the vehicles getting in/out of the garage of the building at {address redacted} about the pedestrian sidewalk traffic. Was advised to call Police Traffic Safety Dept. claiming that installing traffic signs is the police responsibility not the City's. They said police dept. said the truth is the opposite..."*

- *"...I spoke to {3-1-1 Toronto customer service representative name redacted} about suspected animal cruelty at a condo. She was determined to not take the complaint. First, she said I had to call the police. I told her I had and was told to call 311..."*

- *"...resident said she called this morning about a construction fence that was blown down. 10ft deep hole. And the 311 agent transferred the call to Toronto Police instead of following {311 procedures}..."*

- *"...Caller is upset as he has been trying to report a noise complaint to 311... caller says he was incorrectly directed to the police who were angry to receive noise complaints from 311. Officer provided his badge number to have 311 made aware this is not the correct process..."*

Council member's motion sought to investigate this issue further	This issue was highlighted at the June 2021 City Council meeting[80], where a member's motion indicated that *"...Residents who report late-night noise issues (related to large parties, for example) are confused when told by the Toronto Police Service that it is a Municipal Licensing and Standards issue, while Municipal Licensing and Standards claims it is a Police issue. This gap leaves residents with no recourse, and there is apparently a lack of consistency in how 311 deals with these calls."*
3-1-1 call for service diversion outcomes have not been formally evaluated since 2019	While TPS management conducted an analysis of calls for service referred to 3-1-1 Toronto at the beginning of 2019, no further analysis has been conducted since, to assess if the protocol is working as intended, if roles and responsibilities are clearly understood, and if there are any opportunities to increase calls for service that can be diverted to 3-1-1 Toronto. According to our review of meeting minutes, we also noted that the joint TPS and City steering group has not met since 2018.
Further evaluation is required to ensure optimal outcomes	Often what is measured is what gets actioned, and TPS advised us that one of the reasons why the number of calls for service diverted to 3-1-1 Toronto is not higher may be that this area is not regularly measured or reviewed. Regular joint evaluation between TPS and the City will be required to ensure that TPS is using its resources in the most effective way and that the people of Toronto receive a satisfactory level of service.

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[80] Link to Council Decision

Increased noise complaint data sharing can help proactively resolve issues

We also noted that TPS and the City do not routinely share noisy party and noise complaint data on a per event basis so that proactive management of noise issues can be addressed. For example, if TPS visits an address for a noise issue, and the caller does not also contact 3-1-1 Toronto separately to open a noise complaint about that address, MLS is generally not notified that the police attended that address.

We reviewed a list of noise complaints (including noisy party complaints) that MLS had investigated since October 2019 and noted addresses where TPS had visited for a noisy party event that did not have any noise complaints on file with MLS.

Privacy considerations should be reviewed

Increased data sharing may help the City and TPS perform more proactive management of by-law issues and reduce the reliance on dispatching TPS officers. However, before undertaking any data sharing, a review of relevant privacy considerations should be performed, in consideration of the *Municipal Freedom of Information and Protection of Privacy Act*, and any other relevant legislation.

> **Recommendations:**
>
> 22.   **City Council request the City Manager, and the Toronto Police Services Board direct the Chief, Toronto Police Service (TPS) to work in collaboration to:**
>
>   a)   **assess if current call for service diversion strategies to the City, through 3-1-1 Toronto, are working as intended, and if TPS and City staff clearly understand the roles and responsibilities.**
>
>   **This should include evaluation of call volumes and outcomes at both TPS's Communications Centre and 3-1-1 Toronto for relevant call for service types.**
>
>   b)   **assess if there are opportunities to increase call for service diversion from TPS to the City.**

23. City Council request the City Manager, and the Toronto Police Services Board direct the Chief, Toronto Police Service (TPS) to work in collaboration to consider through an interface or other means, increasing the information shared between City divisions (e.g. Municipal Licensing and Standards Division, 3-1-1 Toronto, etc.) and TPS on a per call for service basis (e.g. addresses where police respond to noisy parties) so that trends can be identified and the City can help address the root cause of issues that are not police matters.

Before undertaking any data sharing, TPS and the City should perform a legal review, which includes consideration of any relevant privacy considerations, specifically the requirements outlined in the *Municipal Freedom of Information and Protection of Privacy Act*.

C. 2. Increased Integration and Collaboration with Other Agencies

Using 2-1-1 Central Data and Community Resources

TPS should consider 2-1-1 data to help drive decision making

2-1-1 Central, operated by Findhelp Information Services, operates a 24 hours a day, seven days a week helpline and website to provide information on and referrals to community, social, health-related and government services. The public can contact 2-1-1 to inquire about and obtain referrals to these services.

2-1-1 also maintains data related to the services people are looking for, and when they contact 2-1-1. If analyzed in conjunction with TPS call for service data, this information may be helpful in providing insights to TPS on where front-line resources are regularly deployed, where demand for community services may exist, and assist with potential community-based alternative solutions.

However, before undertaking any data sharing, a review of relevant privacy considerations should be performed, in consideration of the *Municipal Freedom of Information and Protection of Privacy Act*, and any other relevant legislation.

Recommendation:

24. City Council request the City Manager, and the Toronto Police Services Board direct the Chief, Toronto Police Service (TPS) to work in collaboration to leverage 2-1-1 Central data in conjunction with call for service data, at an aggregate level, to identify neighbourhoods where there are a high number of low priority calls for service, and where community resources may exist to help divert front-line police resources.

Before undertaking any data sharing, TPS and the City should perform a legal review, which includes consideration of any relevant privacy considerations, specifically the requirements outlined in the *Municipal Freedom of Information and Protection of Privacy Act*.

Increased Public Education and Awareness May Lead to Better Outcomes

Increased and ongoing public awareness and education may be needed

Increased and ongoing public awareness of the appropriate agency to call to resolve issues may help as a preventative measure to avoid some police calls for service and/or having front-line resources dispatched to calls for service and may help ensure that vulnerable individuals receive the community support they require.

In some calls for service we reviewed where we noted a PRU response may not have been needed, we noted that call takers or the officers attending on scene provided advice or education to callers on the agency/organization that would be most appropriate to contact, such as the Landlord and Tenant Board or 3-1-1 Toronto.

These instances may highlight the need for increased and ongoing public education on who is the appropriate agency to call to resolve the caller's issue, when to call the police for an emergency, as well as increasing awareness of 2-1-1 and the police non-emergency line (416-808-2222).

In its 2020-21 annual report, 2-1-1 Central reported that it received over 360,000 contacts from the public. By way of contrast, in 2021 TPS's Communications Services unit received over 1.7 million calls, and 3-1-1 Toronto responded to 1.4 million customer contacts. While each agency has a different mandate, this contrast may be a possible indicator that greater awareness of 2-1-1 and the services it offers could be helpful.

The last advertising campaign to educate the public on who to call was held in 2018	In 2018, the City and TPS launched a "Make the Right Call" advertising campaign to attempt to educate the public on knowing when to call 3-1-1, the police non-emergency line, or 9-1-1, to ensure they receive the right help, at the right time. No further formal campaigns have been held since then.
	The Auditor General's recent report *Audit of TPS 9-1-1 PSAP Operations* includes a recommendation on increasing public education campaigns on the appropriate number to call for issue resolution (2-1-1, 3-1-1, non-emergency police line – 416-808-2222, or 9-1-1).
	<u>Addressing Public Perceptions on Vulnerable Individuals</u>
Need to address perceptions on the challenges faced by vulnerable individuals	There may also be a need to increase public awareness and challenge societal perceptions about people experiencing mental health issues and/or homelessness. These groups may experience stigma and discrimination, including fears that they may be violent. This could potentially lead to calls for service to police even in situations where there are no indicators to suggest the risk of violence or harm. For example, if a person experiencing homelessness is panhandling outside a restaurant and not exhibiting any dangerous behaviours, it may be more effective for a street outreach worker to help the person, and police do not need to be called.
	The Canadian Mental Health Association reported that studies indicate that people with serious mental illnesses are no more likely to engage in violent behaviour than the general population, and in fact are more likely to be victims of violence themselves[81].
"Toronto For All" initiative may be helpful in educating the public	The City reported that since 2016 it has collaborated with community partners through its "Toronto For All" initiative to create public awareness campaigns addressing implicit biases, negative attitudes and stereotypes, that can have an impact on ensuring Toronto is an inclusive and equitable city for everyone.
	Campaigns in the past have used tools such as transit shelter posters, social media engagement, web-based resources and community information for the general public. There have been several campaigns to date, including a campaign on homelessness.
	There may be an opportunity for the City to use this initiative to draw attention to these perceptions and to highlight when to consider if a non-police response, such as calling the City's Streets to Homes Outreach Program, may be more appropriate, recognizing that police may still be needed depending on the circumstances.

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[81] [Violence and Mental Health: Unpacking a Complex Issue (cmha.ca)](cmha.ca)

Recommendation:

25. City Council request the City Manager, and the Toronto Police Services Board direct the Chief, Toronto Police Service (TPS) to work in collaboration to consider implementing public awareness campaigns addressing the public's perceptions on people experiencing mental health challenges and/or homelessness and what type of response (e.g. police or non-police response) would be most appropriate.

This process should include mechanisms for campaign evaluation (e.g. key metrics that will be measured), a process for including community engagement in the planning process and determining the most appropriate target audience.

Conclusion

TPS plays a key role in ensuring safety and well-being of Toronto

Toronto Police Service (TPS) plays a key role in ensuring the safety and well-being of the people of Toronto through its delivery of policing services. As first responders, TPS officers are on the front lines and respond to a variety of situations. However, not all of the calls for service that TPS has historically responded to are police matters.

In responding to these calls for service, TPS has effectively become the default response in some situations when alternative non-police responses are not in place or not available when needed.

TPS alone cannot support the needs of vulnerable individuals

Furthermore, a lack of adequate supports for vulnerable individuals, including people experiencing homelessness and mental health challenges, has sometimes resulted in a default police response to these calls for service. Supporting the complex needs of these individuals is not something that a police emergency response was intended to resolve and alternative community-based responses, if in place and available when needed, can help to provide the needed social supports for people.

Whole-of-government approach and investment in social service infrastructure and alternative strategies needed

In our view, based on our results, a transfer or "lift and shift" in funding from TPS to the City for these alternative non-police responses, created by freed up capacity of PRU officers, is currently not possible, and it is not enough. Until the alternative responses are effective and available when needed, PRU officers may still be required to attend these calls for service. In addition, we have identified concerns relating to increasing response times and there is a need to use freed up capacity of PRU officers to address this and other TPS strategic priorities.

A journey of change is needed

Improving community safety and well-being will require active leadership and commitment from the City, and multi-sector collaboration and partnership in pursuing alternative responses. Progress towards this goal will allow TPS to further focus on its strategic priorities. It is important for stakeholders to support one another to achieve the best possible outcomes for the people of Toronto.

Exploring alternative responses will not be a short-term project. A journey of change will be required, that involves methodical planning, informed data-driven decision making, and careful evaluation before effective decisions can be made.

It will be important for TPS, the City, and other stakeholders to develop concrete community-wide plans that include the desired outcomes and a framework to capture data, and track, evaluate and report out publicly on the progress of pilot outcomes. This will help the City, TPS, and other stakeholders to make evidence-based decisions and ensure transparency and accountability as all stakeholders move forward together.

Our review makes 25 recommendations that provide the starting point for the City, TPS and its partners to embark on this journey of change to build better outcomes together.

Objectives, Scope and Methodology

TPSB requested the Auditor General conduct a risk assessment and audits of TPS

In November 2020, at the request of the Toronto Police Services Board (TPSB), the Auditor General completed a risk assessment of the Toronto Police Service (TPS) to develop a risk-based audit plan. This plan was independently developed by the Auditor General and sets the audit priorities at TPS over the next five years.

In March 2021, TPSB, TPS and the Auditor General signed a Memorandum of Understanding which, established a five-year term during which the Auditor General will carry out performance audits examining whether TPS's programs or services are achieving objectives effectively, economically, and efficiently.

Project focuses on identifying opportunities

This project reviews TPS's policing responsibilities and service areas to identify opportunities for improving efficiency and effectiveness and potential alternative responses.

Our review looked to answer the following questions:

- Are there types of events for service that TPS is responding to that can be handled more efficiently through a non-uniformed response, by other entities, or through using a different approach, so that policing resources can be allocated towards the most value-added activities?

- Are there opportunities for TPS to maximize the use of resources and achieve efficiencies in staffing and other operational areas, while still achieving its objectives effectively in a cost- effective manner, through automation and the increased use of technology?

- Is TPS adequately managing and coordinating its activities with other entities, with the view of maximizing efficiency, effectiveness, and economy for the City as a whole?

Our scope

This project focused on the period from 2017 to 2021. Where relevant, we examined certain records and data outside of this period.

Due to the impacts of the COVID-19 pandemic, in some sections of our project we focused on 2019 data since it represents the most recent, normalized, full year of data. TPS reported that call for service data and response times in 2020 and 2021 may not accurately reflect the true state of operations due to the impacts of the COVID-19 pandemic.

Our methodology

Our work included the following:

- Review of TPS and TPSB policies and procedures;

- Review City by-laws and other relevant City agency policies and procedures;

- Review of relevant legislation, including the *Police Services Act* and upcoming changes;

- Review of TPS budget information, strategic plans, and internal and external reviews;

- Interviews with staff from TPS, TPSB, Toronto Police Association, Toronto Paramedic Services and various City divisions;

- Review of previous external and internal reviews of TPS for potential cost savings;

- Analysis of calls for service through a review of various sources of information including caller audio, the chronological history of the call for service and officer response, general occurrence report, officers' memo book notes, audio of body cam footage and dash cam footage, where available; and,

- Research and benchmarking with other jurisdictions.

Experts were used to validate results

In selecting and interpreting the sample described in Section A.1, we used statistically valid, randomly selected, sampling techniques using a 90 per cent confidence level and 15 per cent margin of error.

For sample items where we noted that PRU may not be required, our conclusions were informed in consultation with a panel of experts which included former law enforcement officers with many years of policing experience.

Limitations	Our findings and conclusions were based on information and data provided by TPS at the time the review was completed.
Data integrity issues	We used data provided by TPS to perform our analysis, but we are unable to provide assurance on the reliability and accuracy of the data due to system limitations and weaknesses in controls and the information systems used by TPS, in particular relating to call for service data and staffing/accommodation related data.

During the review we identified discrepancies in the number of records between the various database tables of the I/CAD system. At our request, TPS management raised this issue with the I/CAD system third-party vendor. The vendor identified that this may have been as a result of potential system failures during the database update process, however, the vendor indicated that further investigation would be required to confirm the cause. As the cause is still unknown, we are unable to determine the impact of this issue on the data we relied on during our review. |
| **Changes to legislation may impact our recommendations** | Further, our recommendations are based on the *Police Services Act*, as enacted at the time of our review. In March 2019, the Government of Ontario passed the *Community Safety and Policing Act* and once in force, will replace the current Act. Regulations which are expected to clarify the new legislation, including the types of policing services functions allowed under section 14, have not yet been finalized. The *Community Safety and Policing Act* has not yet come into force and any changes from the current *Police Services Act* may impact the recommendations contained in this report. |
| **The work we describe in this report was not an audit** | The work performed in relation to this report does not constitute an audit conducted in accordance with Generally Accepted Government Auditing Standards. However, we believe we have performed sufficient work and gathered sufficient appropriate evidence to provide for a reasonable basis to support our observations and recommendations. |

Appendix 1: Toronto Police Service Management's Response to the Auditor General's Report Entitled: *"Review of Toronto Police Service - Opportunities to Support More Effective Responses to Calls for Service, A Journey of Change: Improving Community Safety and Well-Being Outcomes"*

Recommendation 1: City Council request the City Manager, and the Toronto Police Services Board direct the Chief, Toronto Police Service (TPS) to work in collaboration along with other agencies, to determine the feasibility of setting up adequately resourced, non-time restrictive, alternative responses for events where police are currently attending and where such attendance is likely not essential.

In doing so, the City and TPS should:

   a) identify call for service event types, including but not limited to, the six event types discussed in our report that may be suitable for an alternative response;

   b) develop reasonable criteria for each event type to assess the calls for service within those event types that may be suitable for an alternative response, including defining the level of acceptable risk and liability and how these factors will be managed;

   c) consider alternative response pilot programs (e.g. community dispute mediation), with adequate evaluation mechanisms, to provide information and insights on the effectiveness of any established responses. This should include an assessment of the feasibility and cost-effectiveness of providing these alternative responses;

   d) consider existing City or other community programs that could provide an alternative response and where needed, the feasibility and cost-effectiveness of changing the approach and resourcing to provide a timely and effective non-police response (e.g. Municipal Licensing and Standards Division for noisy small gatherings, Shelter, Support & Housing Administration Division street outreach teams);

   e) consider a gradual and informed approach to establishing responses and assess the factors that would be needed for an effective and efficient full transition, including consultation with the public; and,

   f) develop and regularly update a plan that includes key milestones and targets so that progress can be tracked.

Management Response: ☒ Agree   ☐ Disagree
Comments/Action Plan/Time Frame:
TPS agrees with this recommendation and will plan with the City. Indeed the TPS has embraced opportunities and is an active partner with the City and other organizations in the creation of other response models for the appropriate types of calls, as is most recently demonstrated by our assistance in the creation of the Toronto Community Crisis Service (TCCS) pilot, and by our own Gerstein Crisis Centre pilot.

Additionally, in any situation where dispute calls are diverted to non-police mediation, the TPS will need a mechanism to ensure police can still access important information (reports, etc.) related to these types of calls. In some cases, these dispute reports indicate a pattern of behavior that can escalate to violence and/or child abuse. Case Managers rely on these patterns of behavior to assist their investigations.

For 1d, implementation is dependent on these resources being available 24/7.

Implementation also requires the appropriate resourcing of the TPS Communications Unit and the incremental infrastructure to manage dispatch to alternative service providers, and hand-offs back and forth between existing first responders and these alternative providers.

The TPS already meets weekly with City managers from SDFA to discuss aspects of the TCCS pilot and will leverage this existing relationship to work with staff to implement this recommendation.

As this report notes, there are areas of core service that require action and improvement in service delivery by the TPS. Any efficiencies found through the implementation of this (and other) recommendations will be used by the TPS to invest in and improve the delivery of those core policing services. As a result, and as noted by the Auditor General, it is important to view the process contemplated by this recommendation not as a budgeting exercise, but rather, an evidence-based process through which public resources are better aligned with appropriate service delivery options. The reality may be that funding levels overall will not see a reduction – especially as the city continues to grow – but, that with better alignment, the best outcomes are being achieved through the most appropriate deployed service, and that the funding needs for any option are better managed and made more sustainable than would otherwise be the case over the long-term.

Recommendation 2: City Council request the City Manager, in consultation with the Toronto Police Services Board, to reiterate the City's requests for funding commitments from the Government of Canada and the Ontario Government to support permanent housing options and to provide supports to address Toronto's mental health and addictions crises.

In doing so, the City should communicate to the other governments that a "whole-of-government" funding approach in these areas will be critical to building the infrastructure needed to support effective alternative response delivery and ensure the best possible outcomes for the people of Toronto.

Management Response: ☒ Agree ☐ Disagree
Comments/Action Plan/Time Frame: TPS agrees with this recommendation and will provide support to the City to implement. Discussions can occur immediately.

Recommendation 3: Toronto Police Services Board direct the Chief, Toronto Police Service (TPS), in consultation with the Toronto Police Association, to:

a) **assess the impact of expanding the Primary Report Intake, Management and Entry (PRIME) Unit, Community Investigative Support Unit (CISU) and District Special Constable programs, and, where appropriate, if it would assist with supporting and/or further reducing the time spent on events currently attended by Priority Response Unit (PRU) officers. For the PRIME and CISU units, consider both sworn members (including retired officers) and potentially civilian members, where appropriate, for potential expanded capacity.**

b) **consider if all TPS Special Constables, including Court Officers and District Special Constables, can be cross-trained to increase the pool of Special Constables available to assist the PRU in call for service diversion.**

Management Response: ☒ Agree   ☐ Disagree
Comments/Action Plan/Time Frame: TPS agrees with this recommendation. An analysis will begin by Q4 of 2022, with a report back to the Toronto Police Services Board by Q2 2023. The Service will develop a hiring strategy to ensure that sufficient special constables are available to fill vacancies created by those that leave to pursue police constable positions as they become available. This strategy may require hiring beyond the current authorized strength to avoid the inherent lag time created by the recruitment, onboarding and training process. For 3a, an expansion of the PRIME Unit, CISU or DSC programs will require a review of impacts related to funding and resource allocation. This will ensure that increasing resources in these areas will not reduce resources in other TPS areas that must be maintained for adequate core service delivery (e.g. PRU). Another avenue that will be reviewed is expanding part-time roles for retired officers, which is far less expensive than having a full-time officer do the job. For example, having retired officers responsible for reports will allow this investigative task to be completed effectively and more efficiently than, perhaps, through other options. CISU members are now required to "log in" to the PRIME system and are to be dispatched to events by the PRIME Sergeants, thereby expanding the functionality of the PRIME Unit. Early feedback indicates a much improved response to these calls. TPS is planning to further train CISU members to process on-line reports to further increase efficiencies and deployment of this alternative response. For 3b, the Special Constable Generalist Program was approved by Command in March 2022. The Program will allow for a multi-functional special constable role with greater versatility and flexibility, and enables special constables to perform all three functions – district special constable, booker, and court officer. In this way, the TPS is very much proceeding in the direction recommended by the Auditor General. A job call has been posted with a class starting in Q3 and another in Q4. A 'patch' course for all current special constables has been developed which will start in Q1 2023.

Recommendation 4: Toronto Police Services Board direct the Chief, Toronto Police Service to examine if:

a) aspects of the Primary Report Intake, Management and Entry Unit and Community Investigative Support Unit (CISU) can be centralized together, so that the workload can be shared and calls for service can be handled more efficiently.

b) For aspects that cannot be centralized, (e.g. mobile CISU units) consider more clearly defining the responsibilities and expectations, including workload allocations, to both units.

Management Response: ☒ Agree   ☐ Disagree
Comments/Action Plan/Time Frame:
TPS agrees with this recommendation. For 4a, CISU members are now required to "log in" to the PRIME system and are to be dispatched to events by the PRIME Sergeants, thereby expanding the functionality and deployment of the PRIME Unit. Early feedback indicates a much improved response to these calls. TPS is planning to further train CISU members to process on-line reports to further increase efficiencies. For 4b, the Investigative Review project, currently underway, will include a review of CISU functions. The Investigative Review final report is anticipated to be completed by Q4 2022, with related recommendations being implemented throughout 2023.

Recommendation 5: City Council request the Chief, Toronto Paramedic Services, and the Toronto Police Services Board direct the Chief, Toronto Police Service (TPS) to work in collaboration to review current protocols for when Priority Response Unit (PRU) officers are requested for See Ambulance calls for service. This should include:

a) determining if there are any opportunities to further refine the See Ambulance protocol so that the attendance of PRU officers is based on an articulable risk to paramedic safety, specific to the unique circumstances of each call for service;

b) re-evaluating the criteria for when police are requested. This evaluation should specifically consider, but not be limited to, if the presence of alcohol, in absence of other risk factors, requires an automatic PRU response;

c) ensure that the rationale for requesting PRU attendance and other important information is clearly documented in the Toronto Paramedic Services call for service details. Both entities should also consider documenting which entity initiated the request for attendance from the other entity;

d) in situations where TPS would have sent PRU officers to calls for service irrespective of a request from Toronto Paramedic Services, TPS should consider documenting this in its call for service system;

e) regular, joint evaluation of calls for service where PRU attendance is requested, to assess the effectiveness and efficiency of the revised protocol and consider any changes as necessary; and,

f) consider if additional training is needed for TPS and Toronto Paramedic Services call takers to ensure requests for police attendance are well documented and comply with policies and procedures.

Management Response: ☒ Agree ☐ Disagree
Comments/Action Plan/Time Frame:
The TPS agrees with this recommendation and will work with our partners at Toronto Paramedic Services to implement. Discussions will commence by Q3 2022. Specific to 5e, the TPS would like to emphasize the importance of ensuring that issues are addressed in a timely manner, and welcomes the assistance of Toronto Paramedic Services with implementation.

Recommendation 6: Toronto Police Services Board direct the Chief, Toronto Police Service (TPS) to evaluate the root causes for increasing response times and determine a strategy for meeting priority one to priority three response time targets. This should specifically include:

a) considering strategies for how to improve staff deployability rates, both across the organization and for individual TPS divisions;

this could include reallocating officers across divisions when needed, and more active management of TPS members who are on accommodation, or long or short-term disability.

b) assessing how implementing the recommendations in Section A of this report would assist with improving response times.

Management Response: ☒ Agree ☐ Disagree
Comments/Action Plan/Time Frame:
TPS agrees with this recommendation. The TPS has engaged the services of a criminal justice management consultant to assist in the review and establishment of a deployment model that will allow the TPS to more reliably meet its Reactive/Proactive policing goal (70/30, where PRU members spend an average of 70% of their time responding to calls for service in a timely manner, and 30% of their time on proactive community safety functions). To that end, after appropriate consideration of the consultant's analysis and recommendations, the TPS will adopt a Response Time target that will be public, with regular public reporting on how the TPS is faring in relation to that target. Discussions and a readiness assessment are currently underway. Work on this recommendation is ongoing and will require dedicated analytical and information design work (project staff and project plan). This recommendation aligns with the Information Management (IM) Framework project, which includes the vision, principles, pillars, and strategic focus areas that will be collectively applied to mature overall data management for the Service. This Framework has been created using industry best-practices and is designed for the Service's

unique needs. This recommendation could also potentially align with NG9-1-1 project. It is expected that Implementation of this recommendation is a 2 year project, requiring 2 IM specialists to redesign, implement, map data and migrate reports.

Additionally, several projects are in progress that will investigate other potential correlating factors to increased response times. These projects include an evaluation of the shift schedule pilots and a staffing levels analysis. Information gained from these projects will help TPS inform approaches for improving deployability rates and response times to emergency calls for service.

For 6a, disability management IT Systems require investment and potentially overhaul. TPS will lead this work.

Recommendation 7: Toronto Police Services Board (TPSB) direct the Chief, Toronto Police Service (TPS) to:

a) evaluate the root causes for increasing clearance times, particularly for non-emergency, low priority (priority four to six) calls for service, and consider the impact on response times; and,

b) in collaboration with TPSB, consider setting reasonableness thresholds for call for service clearance times by event type and evaluating/analyzing clearance times across divisions and event types to enhance performance measurement and operational monitoring at a high-level (e.g. divisional and/or TPS-wide).

Management Response: ☒ Agree   ☐ Disagree

Comments/Action Plan/Time Frame:

TPS agrees with this recommendation.

In addition to reasonableness thresholds, TPS notes that proper supervision will also be an important factor in operational monitoring or compliance. This will require more focused capacity for supervisors than is currently available and may require an increase in staffing.

Work on this recommendation is ongoing and will require dedicated analytical and information design work (project staff and project plan). In part, the analytical work required stems from the reality that there are no well-established 'clearance standards' in policing. TPS notes that setting benchmarks for clearance times is very difficult. It should be studied carefully and then tested in a controlled manner to guard against unintended consequences. Benchmarks should also be compared to long-term averages, and used for analyses of systemic barriers, rather than as a "target" or "maximum" time used for individual discipline. However, the TPS is prepared to undertake this work itself and establish standards that make sense within the Toronto community safety context. This recommendation also aligns with the Information Management Framework project and could potentially align with NG9-1-1 project. Implementation will require dedicated project staff and project plan and at least 1-2 years for foundation. A working group will be struck to begin this work in Q4 2022.

For 7b, work is ongoing, but requires dedicated analytical and information design work for implementation.

Recommendation 8: Toronto Police Services Board, work in collaboration with the Chief, Toronto Police Service (TPS) to:

a) review response time standards adopted as part of the Metropolitan Toronto Police Restructuring Task Force's "*Beyond 2000: Final Report*" and determine if any updates are needed;

b) once a reasonable set of response time standards have been agreed upon and formally adopted, communicate them across the organization and routinely measure progress against those standards;

c) consider publicly reporting out on its response time performance to increase transparency and accountability; and,

d) consider its current response time calculation methodology and consider including the impact of call taker time and any other relevant factors, including items which may not be currently included.

Management Response: ☒ Agree ☐ Disagree
Comments/Action Plan/Time Frame: TPS agrees with this recommendation. The TPS has engaged the services of criminal justice management consultant to assist in the review and establishment of a deployment model that will allow the TPS to more reliably meet its Reactive/Proactive policing goal (70/30). To that end, after appropriate consideration of the consultant's analysis and recommendations, the TPS will adopt a Response Time target that will be made public and in relation to which the TPS will regularly and publicly report. Work should begin after the consultant gives their report back, likely to be Q4 of 2022. TPS notes this needs to be undertaken in a very thoughtful way with input from stakeholders across the Service. The TPS may establish a Steering Committee, and the development of a formal implementation plan and training to ensure targets are being used correctly. Implementation should likely be included as a deliverable in our Information Management Framework project. Work on this recommendation is ongoing and will require dedicated analytical and information design work (project staff and project plan). This recommendation aligns with the Analytics Framework project. For 8d, public consultation is essential to ensure the public understands and has an opportunity to inform the components of the public-facing elements of this work.

Recommendation 9: Toronto Police Services Board direct the Chief, Toronto Police Service (TPS) to determine if an automated technology solution can be implemented to improve completeness of information for officer arrival times (or increase compliance with officers pressing the "at-scene" button), so that arrival time is recorded for all responses and that all responses are included in the response time calculation.

Management Response: ☒ Agree   ☐ Disagree
Comments/Action Plan/Time Frame:
TPS agrees with this recommendation and will consider methods to improve officer compliance in notifying the arrival at scene time. As attending officers are now equipped with Body Worn Cameras, we may be able to determine their arrival time by integrating the BWC data, however further analysis is required. TPS will investigate whether implementation is possible through augmented GPS accuracy with telematics and leveraging the Digital Officer Mobile Devices. Messaging will be prepared in response to this recommendation and others reminding members that when assigned to an event they must acknowledge with their dispatcher when they are At Scene of the event. It is not within the understanding of every member of the value of this metric, and as members are more focused on solving the problem the value of acknowledging At Scene is not always top of mind. The police sergeant on the road during these calls is constantly aware of where his/her team resources are and how long they are taking to process events. The constraint is when the platoon has only one supervisor and they are operationalized at a major event or an event that procedurally they are required to be present. Sergeants will be reminded again of the importance of what members are doing, and that members are acknowledging with the dispatcher when they are at scene, either by voice or by MWS, and then consecutively when they are clear from the event. Further, the on road supervisor works in partnership with their dispatcher to understand capacity, to approve lunch hours or remaining in service. The supervisor can also instigate dialogue with the dispatcher to clarify or communicate an At Scene acknowledgment. This response is dependent on the availability of supervisors which is a constant resourcing challenge for TPS. TPS will strike up a working group by Q4 of 2022.

Recommendation 10: Toronto Police Services Board direct the Chief, Toronto Police Service (TPS) to ensure its 70/30 reactive/proactive officer time goal is effectively communicated across the organization, understood by the front line, and regularly measured.

In measuring achievement of this goal, TPS should identify divisions where the goal has not been met, identify the root causes, and develop strategies to enhance achievement.

Management Response: ☒ Agree   ☐ Disagree
Comments/Action Plan/Time Frame:
TPS agrees with this recommendation. TPS is currently refining KPIs across the organization to allow us to build strategies based on the results of data analysis. This will include an analysis of officer-generated event types that map to community engagement-related events in Q4 2022

TPS notes that proper staffing levels in the PRU and other support units will have to be achieved for this recommendation to ultimately be met. The staffing level will also be influenced by the response time target that is selected, and be impacted by alternative service delivery approaches that are sustainability implemented. TPS is currently working with an external consultant to perform a readiness assessment prior to beginning a more fulsome staffing analysis. As stated in Recommendation 8 work should begin after the consultant gives their report back, likely to be Q4 of 2022.

Recommendation 11: Toronto Police Services Board direct the Chief, Toronto Police Service (TPS) to improve TPS data quality and reliability by:

    a) **establishing more detailed time categories in the Intergraph Computer Aided Dispatch system, so that TPS can have more detailed information on how time is being spent on a per call for service basis. For example, this could include time spent on activities such as reporting, time spent during calls for service on investigative activities, and time spent on customer service/dispute resolution/mediation.**

        In improving the usefulness of data for time tracking purposes, TPS should consider both the need to collect more enhanced, detailed information, and the operational demands on TPS members.

    b) **improve the reliability of the data of the Time Resource Management System, including ensuring accurate reflection of leave hours, and members' work assignments;**

    c) **improve data reliability and quality related to members on disability and/or accommodation; and,**

    d) **consider opportunities for integration between staffing and accommodation/disability management systems, where appropriate, so that there is one clear, reliable source of information for making staffing, resourcing and wellness decisions.**

Management Response: ☒ Agree   ☐ Disagree
Comments/Action Plan/Time Frame: TPS agrees with this recommendation. The Service will develop a more specific plan to address these issues by Q1 2023. There are many co-dependencies in this area that will need to be addressed in the plan. This requires a co-design process to define which systems will measure which dimensions to then be combined in analytics. For 11b-d, implementing these recommendations will require process and system enhancements, such as modules for staff scheduling or labour allocation. The Information Management Framework supports this, however some system enhancements may be required. Implementation will take approximately 2 years from receiving funding approval.

For 11c, there will be a requirement to balance access to data with member privacy, however the TPS realizes that it must better track this data.

Recommendation 12: Toronto Police Services Board direct the Chief, Toronto Police Service (TPS) to improve the collection and analysis of its call for service data so that it includes more detailed sub-categories or data fields for responding officers to indicate the nature of the calls for service. This will allow for more robust data analysis and provide data for calls for service that may be suitable for alternative responses. Specifically, this should include:

a) sub-categories/data fields to better understand event types that are broad in nature. For example, Check Address, Unknown Trouble, Advised and 311 Referral;

b) system flags/data fields to identify any calls for service that involved interaction with persons experiencing homelessness and/or mental health challenges, or any other factors that may be helpful in analyzing calls for service; and,

c) text analysis on call for service notes in the call for service system to allow for more effective event analysis.

Management Response: ⊠ Agree   ☐ Disagree
Comments/Action Plan/Time Frame: TPS agrees with this recommendation. Implementing this recommendation will require process and system enhancements, focused on data architecture and technology to support electronic officer notes. Additionally, an impact study on the cumulative time effort for completing this additional data entry will be required prior to implementation. This is to ensure that the cumulative impact of implementing this and other recommendations (e.g. *Missing & Missed*) will not introduce any additional load or delay in critical officer work operations. TPS wishes to avoid unintentionally increasing time on call and decreasing officer availability for emergency calls. For Recommendation 12c, AI/ML application for analysis will also be required. The Information Management Framework project supports this, but system enhancements will be required. Attention to potential increases in processing time for Call takers will also need to be considered. In operationalizing this data, TPS will be mindful of the way data is captured, labeled and used, so as not to stigmatize any impacted persons. TPS recognizes the need to be mindful about how and what kinds of information we will be capturing. TPS has been criticized in the past for how we have handled and shared personal health information within our RMS and interfaces such as CPIC. For example, we now have more stringent rules for capturing and storing information when police attend an attempt or threaten suicide call. Also, a person's mental health challenges can be fluid, and it may be problematic to label an individual within our systems, based on one point in time, without a mechanism to update their health status between interactions with police. Collecting more information related to mental health will require consultation with the Ontario Information and Privacy Commissioner and a review of PHIPA.

Implementation of this recommendation is a 2 year project, requiring 2 IM specialists to redesign, implement, map data and migrate reports. The Service will be providing interim updates on progress to the Board.

Recommendation 13: City Council request the City Manager, and the Toronto Police Services Board direct the Chief, Toronto Police Service (TPS) to work in collaboration along with other agencies to:

a) analyze low priority, non-emergency calls for service (e.g. Unwanted Guests, Check Address etc.) to identify instances where officers are repeatedly attending the same locations; to determine if an alternative resolution can be implemented. In developing solutions, TPS should consider if call for service volume can be reduced through implementing Recommendation 1 of this report; and,

b) for calls for service at hospitals related to missing persons inquiries, consider if a technological solution, such as an automated portal with authentication, may help reduce hospital visits and free-up officer time for more priority calls for service.

This evaluation should consider legislative requirements and consultation with the Ministry of the Solicitor General and other stakeholders, as required.

Management Response: ☒ Agree ☐ Disagree
Comments/Action Plan/Time Frame: TPS agrees with this recommendation. Implementation is quite feasible and will require the involvement of other entities. Work is ongoing, however several dependencies will drive our implementation timeline, including Recommendation 12 above. Work will commence in Q3 2022. Once we are able, we will perform the requested analysis to identify trends in order to make ourselves ready to engage with other stakeholders who may volunteer to assist in handling these incidents; or, indeed, take ownership of them completely. For 13b, any technological solution will have to be implemented in partnership with the Ministry of the Solicitor General and may not be possible without an amendment to the *Missing Persons Act*. In addition, the implementation of this recommendation will require cooperation of the Ministry of Health and hospitals.

Recommendation 14: Toronto Police Services Board direct the Chief, Toronto Police Service (TPS) and City Council request the City Manager to work in collaboration with the President & CEO, Toronto Community Housing Corporation (TCHC) to determine if strategies can be implemented to reduce instances of Priority Response Unit officers repeatedly dispatched to the same locations within TCHC properties.

Management Response: ⊠ Agree   ☐ Disagree
Comments/Action Plan/Time Frame: TPS agrees with this recommendation and will work with our external partners to implement. Work will commence in Q3 2022.   An increase to the TCHC Special Constable program would assist in alleviating calls for service to the TPS at TCHC properties, especially if TCHC implemented a similar strategy to our NCO program by having Special Constables embedded in smaller defined areas of their properties for a minimum of 2-4 years. They would be able to address ongoing, longer term issues and, likely, eliminate the need for TPS to attend many of the calls we currently attend by focusing in a more sustained way on community safety and well-being issues.

Recommendation 15: Toronto Police Services Board direct the Chief, Toronto Police Service (TPS) to:

a) accelerate the Digital Officer program and electronic memo book initiative, including any interfaces with other records management and reporting systems, to create efficiencies in how front-line officer time is spent.

b) consider any best practices that can be leveraged from other jurisdictions, and if any aspects of a digital memo book can be implemented on a more short-term basis, even if full integration is not achieved.

Management Response: ⊠ Agree   ☐ Disagree
Comments/Action Plan/Time Frame: TPS agrees with this recommendation.   An enhanced Records Management System (RMS) and IM data models to integrate systems are required to implement this recommendation without significant sub-optimization. Other jurisdictions have been examined for first-generation electronic notes and lessons learned point to high degree of RMS integration for functionality, supportability and future friendliness. Implementation will need to include analysis to ensure that other PRU functions will not be negatively impacted.   Planning is ongoing for the RMS project. We anticipate this will take at least 2 years; however, we will seek any opportunity to accelerate this work, while remaining cognizant of potential risks that must be addressed or mitigated.

Recommendation 16: Toronto Police Services Board direct the Chief, Toronto Police Service (TPS) to:

a) continue to pursue digital strategies, such as video calling, as an alternative to front-line Priority Response Unit officer response and consider if there are any event types that can be addressed remotely without an on-scene police response.

In doing so, TPS should assess if there are any legislative or privacy requirements that would need to be examined in relation to increased use of technology such as video capability.

b) review event types and consider if there are any additional event types that the public can report through the online reporting system or if current reporting criteria (e.g. dollar value limits) can be expanded.

Management Response: ☒ Agree   ☐ Disagree
Comments/Action Plan/Time Frame: TPS agrees with this recommendation. We will also be reviewing monetary thresholds, to determine whether offences over $5000 can also be reported online (theft, fraud, mischief and damage) and will also perform analysis to ensure there is no elevated risk of harm to the complainant resulting from implementing this recommendation. TPS will need to be mindful that some of these instances are reported by, or involve, community members who may not be able to access technology, or may have barriers to technology (e.g. elderly residents who are not comfortable with the web/texting). We will also need to ensure that this technology would not unintentionally lead to unintended negative outcomes (e.g. an individual cancelling a call made by their partner as a result of intimate partner violence). Work to achieve this outcome is underway and is a core focus of the Platforms and Transformation Program initiated in 2021. The first use cases are to be delivered at the end of 2023 with the project continuing to deliver use cases up to video interaction. The program is expected to achieve this milestone in 2-3 years and will be ongoing thereafter.

Recommendation 17: Toronto Police Services Board direct the Chief, Toronto Police Service (TPS) to consider as part of its Digital Platform and Transformation Program, an interface for callers to communicate with TPS call takers and provide additional information, and provide confirmation, for certain event types, if a situation no longer exists, such as that an unwanted guest has gone or a noisy party has concluded.

Management Response: ☒ Agree   ☐ Disagree
Comments/Action Plan/Time Frame: TPS agrees with this recommendation. The Service will provide a more specific plan in Q1 2023 and will provide regular updates to the Board. Abort type functionality is envisioned as part of the delivery of this digital service. TPS plans to limit this option to very specific call types, to avoid scenarios where someone in a dangerous situation is compelled to cancel a call under duress (e.g. intimate partner violence or offences in which an individual is being exploited).

Recommendation 18: City Council request the City Manager, and the Toronto Police Services Board direct the Chief, Toronto Police Service (TPS) to work in collaboration to:

a) conduct joint program assessments of the outcomes from current mental health call for service diversion pilots, including the Gerstein Crisis Centre call for service diversion pilot, and the City's Toronto Community Crisis Service, to assess the effectiveness and outcomes of these programs;

b) ensure mechanisms are in place so that both the City and TPS have access to the necessary data, including TPS call for service data (e.g. number of calls for service received, diverted) and relevant call for service details to complete effective evaluations of the current and any future pilots; and,

c) ensure planning for future pilot programs are coordinated, involve both the City and TPS, and consider the recommendations from Section A.1 of this report, to ensure they are achieving the desired outcomes in the most efficient and effective way.

Management Response: ⊠ Agree   ☐ Disagree
Comments/Action Plan/Time Frame: TPS agrees with this recommendation and will undertake this work in partnership with the City. Work on 18a and 18b is already in process.   Implementation will require full Information Management data design for calls for service. An analysis of existing data plus gaps, and a strategy to address, are all required.   For 18a, TPS is in the process of securing a third party to perform this evaluation.   For 18b, TPS will continue to share data with the City to inform the Community Safety and Wellbeing Plan (SafeTO) and will work to provide greater access to the necessary data, including TPS call for service data and relevant call for service details to complete effective evaluations.   For 18c, TPS has recently done this in the design and implementation of the Toronto Community Crisis service (TCCS). The Service will replicate the methods used in the creation of the TCCS when implementing this recommendation.

Recommendation 19: Toronto Police Services Board direct the Chief, Toronto Police Service (TPS) to:

a) consider automating and streamlining the process by which TPS members make and track referrals for community-based services, including the Furthering Our Community by Uniting Services (FOCUS) table and other community referrals, with the goals of making the referral process easier for officers, preventing further repeat calls for service requiring Priority Response Unit officer response, increasing diversion to supporting organizations, and improving the outcomes and quality of service to the public.

b) with these same goals in mind, TPS to also consider performing analysis of call for service data at a corporate level to identify trends or possibly situations that may also be suitable for referral.

Management Response: ☒ Agree ☐ Disagree
Comments/Action Plan/Time Frame:
TPS agrees with this recommendation and recognizes obvious benefits of implementing this recommendation.
TPS will need to coordinate with other partners, including but not limited to FOCUS, to ensure capacity for increased intake. Additionally, training-related considerations will have to be factored into implementation planning.
The project is underway with IM design and partner engagement. The timeline is highly dependent on partners for the full vision. Expectation is to pilot the referral tools to the front-line is by summer 2023.

Recommendation 20: Toronto Police Services Board direct the Executive Director and Chief of Staff, Toronto Police Services Board Office, in consultation with the Chief, Toronto Police Service, and other stakeholders as necessary, to request changes to the legislation for mental health apprehensions regarding police custody while waiting at hospitals.

Management Response: ☒ Agree ☐ Disagree
Comments/Action Plan/Time Frame:
TPS agrees with this recommendation.
Further discussions with external justice partners will be required prior to implementation, to ensure they would also support these changes. TPS will also consult with the Board's Mental Health and Addictions Advisory Panel.
Many TPS processes, policies and procedures related to MHA apprehensions are also informed by Coroner's Inquest recommendations, most notably the Inquest into the deaths of Mr. Andrew Loku, and the inquest commonly referred to as "JKE". TPS is also guided by Justice Iacobucci's 2014 review "Police Encounters with Persons in Crisis". Any review of strategies related to MHA apprehensions should also be informed by those past recommendations and reviews.
Consultations needed to implement this recommendation will be completed by the end of Q4 2022 and will be followed by recommendations from the TPS to the Board concerning opportunities for legislative reform.

Recommendation 21: Toronto Police Services Board direct the Chief, Toronto Police Service (TPS), in consultation with the Chief, Toronto Paramedic Services and the Chief Executive Officers (or other appropriate executive liaisons) of Toronto hospitals to:

    a) **leverage technology and/or the use of data to identify the most appropriate hospital for an officer to transport an individual in custody, with the view of minimizing wait times and travelling the least possible distance.**

b) develop police-hospital liaison committees and transfer of care protocols with all hospitals where TPS transports apprehended persons, to minimize wait times and develop protocols to create a workflow which will benefit both TPS and the hospitals.

Management Response: ☒ Agree ☐ Disagree
Comments/Action Plan/Time Frame: TPS agrees with this recommendation and will work with our external partners to implement. A working group will be struck by Q1 2023.

Recommendation 22: City Council request the City Manager, and the Toronto Police Services Board direct the Chief, Toronto Police Service (TPS) to work in collaboration to:

a) assess if current call for service diversion strategies to the City, through 3-1-1 Toronto, are working as intended, and if TPS and City staff clearly understand the roles and responsibilities.

    This should include evaluation of call volumes and outcomes at both TPS's Communications Centre and 3-1-1 Toronto for relevant call for service types.

b) assess if there are opportunities to increase call for service diversion from TPS to the City.

Management Response: ☒ Agree ☐ Disagree
Comments/Action Plan/Time Frame: TPS agrees with this recommendation and will undertake this work in partnership with the City. The Service will initiate this conversation by end of Q4 2022.   TPS agrees that an examination of why 3-1-1 use has only grown modestly during the TPS's modernization initiatives would be worthwhile, and would help determine if there are any issues associated with 3-1-1 call resolution and/or wait times.

Recommendation 23: City Council request the City Manager, and the Toronto Police Services Board direct the Chief, Toronto Police Service (TPS) to work in collaboration to consider through an interface or other means, increasing the information shared between City divisions (e.g. Municipal Licensing and Standards Division, 3-1-1 Toronto, etc.) and TPS on a per call for service basis (e.g. addresses where police respond to noisy parties) so that trends can be identified and the City can help address the root cause of issues that are not police matters.

Before undertaking any data sharing, TPS and the City should perform a legal review, which includes consideration of any relevant privacy considerations, specifically the requirements outlined in the *Municipal Freedom of Information and Protection of Privacy Act.*

Management Response: ☒ Agree ☐ Disagree
Comments/Action Plan/Time Frame: TPS agrees with this recommendation and will plan with the City by leveraging the current collaborative partnership formed as a result of the work done on the TCCS. Discussions can occur immediately.

Recommendation 24: City Council request the City Manager, and the Toronto Police Services Board direct the Chief, Toronto Police Service (TPS) to work in collaboration to leverage 2-1-1 Central data in conjunction with call for service data, at an aggregate level, to identify neighbourhoods where there are a high number of low priority calls for service, and where community resources may exist to help divert front-line police resources.

Before undertaking any data sharing, TPS and the City should perform a legal review, which includes consideration of any relevant privacy considerations, specifically the requirements outlined in the *Municipal Freedom of Information and Protection of Privacy Act.*

Management Response: ☒ Agree ☐ Disagree
Comments/Action Plan/Time Frame: TPS agrees with this recommendation and will plan with the City. A framework through a working group will be set up by the end of Q4 2022. Data enhancements projected to be made during the TCCS project will assist with implementing this recommendation.

Recommendation 25: City Council request the City Manager, and the Toronto Police Services Board direct the Chief, Toronto Police Service (TPS) to work in collaboration to consider implementing public awareness campaigns addressing the public's perceptions on people experiencing mental health challenges and/or homelessness and what type of response (e.g. police or non-police response) would be most appropriate.

This process should include mechanisms for campaign evaluation (e.g. key metrics that will be measured), a process for including community engagement in the planning process and determining the most appropriate target audience.

Management Response: ☒ Agree ☐ Disagree
Comments/Action Plan/Time Frame: TPS agrees with this recommendation and will plan implementation with the City. Discussions will begin in Q4 2022 and we expect work will commence in Q1 2023.   TPS will also consult with the Board's Mental Health and Addictions Advisory Panel to support implementation.

Appendix 2: City Management's Response to Relevant Recommendations to the Auditor General's Report Entitled: *"Review of Toronto Police Service - Opportunities to Support More Effective Responses to Calls for Service, A Journey of Change: Improving Community Safety and Well-Being Outcomes"*

Recommendation 1:

City Council request the City Manager, and the Toronto Police Services Board direct the Chief, Toronto Police Service (TPS) to work in collaboration along with other agencies, to determine the feasibility of setting up adequately resourced, non-time restrictive, alternative responses for events where police are currently attending and where such attendance is likely not essential.

In doing so, the City and TPS should:

a) identify call for service event types, including but not limited to, the six event types discussed in our report that may be suitable for an alternative response;

b) develop reasonable criteria for each event type to assess the calls for service within those event types that may be suitable for an alternative response, including defining the level of acceptable risk and liability and how these factors will be managed;

c) consider alternative response pilot programs (e.g. community dispute mediation), with adequate evaluation mechanisms, to provide information and insights on the effectiveness of any established responses. This should include an assessment of the feasibility and cost-effectiveness of providing these alternative responses;

d) consider existing City or other community programs that could provide an alternative response and where needed, the feasibility and cost-effectiveness of changing the approach and resourcing to provide a timely and effective non-police response (e.g. Municipal Licensing and Standards Division for noisy small gatherings, Shelter, Support & Housing Administration Division street outreach teams);

e) consider a gradual and informed approach to establishing responses and assess the factors that would be needed for an effective and efficient full transition, including consultation with the public; and,

f) develop and regularly update a plan that includes key milestones and targets so that progress can be tracked.

Management Response: ☒ Agree   ☐ Disagree
Comments/Action Plan/Time Frame: **City Manager's Office:** The City Manager and relevant City divisions will work with the TPS on these recommendations and will commence discussions by Q3 2022. Regarding part c), the City Manager will work with the Executive Director of SDFA to continue its pilots of the Toronto Community Crisis Service related to mental health calls and will continue its regular meetings and communication with TPS on this. Other pilot program opportunities will be explored, such as community dispute mediation. The implementation of those potential additional pilots may be longer term goals for the City, depending on the results of the analysis and the funding available. Regarding part d), the City Manager will work with the General Manager of SSHA to determine the feasibility of setting up alternative responses to 911 calls seeking support for people experiencing homelessness. Such alternatives will include public education on the supports provided through the Streets to Homes Program. The City Manager will also work with the Executive Director of MLS, TPS, and other stakeholders, keeping in mind the strategic direction from the Transformational Taskforce, to assess whether there are any additional measures or alternative strategies to consider in light of the importance of the additional information and context brought forward in the Auditor General's report. This will take time and discussion, and the costs and benefits will need to be considered. A report back will form part of the City's overall response plan to the recommendations in the Auditor General's report.

Recommendation 2: City Council request the City Manager, in consultation with the Toronto Police Services Board, to reiterate the City's requests for funding commitments from the Government of Canada and the Ontario Government to support permanent housing options and to provide supports to address Toronto's mental health and addictions crises.

In doing so, the City should communicate to the other governments that a "whole-of-government" funding approach in these areas will be critical to building the infrastructure needed to support effective alternative response delivery and ensure the best possible outcomes for the people of Toronto.

Management Response: ☒ Agree   ☐ Disagree
Comments/Action Plan/Time Frame: **City Manager's Office:** The City Manager is supportive of this recommendation. The City continues to engage with other governments and partners for adequate funding commitments for health services that adequately support individuals who are homeless and for wrap around services required for supportive housing units.

Recommendation 5:

City Council request the Chief, Toronto Paramedic Services, and the Toronto Police Services Board direct the Chief, Toronto Police Service (TPS) to work in collaboration to review current protocols for when Priority Response Unit (PRU) officers are requested for See Ambulance calls for service. This should include:

a) determining if there are any opportunities to further refine the See Ambulance protocol so that the attendance of PRU officers is based on an articulable risk to paramedic safety, specific to the unique circumstances of each call for service;

b) re-evaluating the criteria for when police are requested. This evaluation should specifically consider, but not be limited to, if the presence of alcohol, in absence of other risk factors, requires an automatic PRU response;

c) ensure that the rationale for requesting PRU attendance and other important information is clearly documented in the Toronto Paramedic Services call for service details. Both entities should also consider documenting which entity initiated the request for attendance from the other entity;

d) in situations where TPS would have sent PRU officers to calls for service irrespective of a request from Toronto Paramedic Services, TPS should consider documenting this in its call for service system;

e) regular, joint evaluation of calls for service where PRU attendance is requested, to assess the effectiveness and efficiency of the revised protocol and consider any changes as necessary; and,

f) consider if additional training is needed for TPS and Toronto Paramedic Services call takers to ensure requests for police attendance are well documented and comply with policies and procedures.

Management Response: ☒ Agree   ☐ Disagree
Comments/Action Plan/Time Frame: **Toronto Paramedic Services:** Toronto Paramedic Services has no concerns with this recommendation and will work in collaboration with Toronto Police Service on these areas.

Recommendation 13:

City Council request the City Manager, and the Toronto Police Services Board direct the Chief, Toronto Police Service (TPS) to work in collaboration along with other agencies to:

a) analyze low priority, non-emergency calls for service (e.g. Unwanted Guests, Check Address etc.) to identify instances where officers are repeatedly attending the same locations; to determine if an alternative resolution can be implemented. In developing solutions, TPS should consider if call for service volume can be reduced through implementing Recommendation 1 of this report; and,

b) for calls for service at hospitals related to missing persons inquiries, consider if a technological solution, such as an automated portal with authentication, may help reduce hospital visits and free-up officer time for more priority calls for service.

This evaluation should consider legislative requirements and consultation with the Ministry of the Solicitor General and other stakeholders, as required.

Management Response: ☒ Agree   ☐ Disagree
Comments/Action Plan/Time Frame: City Manager's Office: The City Manager will work with the TPS on this recommendation.

Recommendation 14:

Toronto Police Services Board direct the Chief, Toronto Police Service (TPS) and City Council request the City Manager to work in collaboration with the President & CEO, Toronto Community Housing Corporation (TCHC) to determine if strategies can be implemented to reduce instances of Priority Response Unit officers repeatedly dispatched to the same locations within TCHC properties.

Management Response: ☒ Agree   ☐ Disagree
Comments/Action Plan/Time Frame: City Manager's Office: The City Manager will work with the TPS and TCHC on this recommendation.   Toronto Community Housing Corporation (TCHC):   TCHC agrees with the recommendation and will meet with TPS and the City, as appropriate, by Q4, 2022 to establish a plan to ensure repeated dispatch locations for TCHC is part of on-going TPS/TCHC operating protocols. The Community Safety Unit (most specifically Special Constables) will most likely be involved in this process; however, this will be confirmed as part of planning process. It should be noted that the timing of the recommendations spans the creation of Toronto Seniors Housing Corporation (TSHC) and some of the locations identified by the Auditor General may now be part of TSHC. TCHC will coordinate as directed by the City with TSHC to achieve the recommendations of this review.

Recommendation 18:

City Council request the City Manager, and the Toronto Police Services Board direct the Chief, Toronto Police Service (TPS) to work in collaboration to:

a) conduct joint program assessments of the outcomes from current mental health call for service diversion pilots, including the Gerstein Crisis Centre call for service diversion pilot, and the City's Toronto Community Crisis Service, to assess the effectiveness and outcomes of these programs;

b) ensure mechanisms are in place so that both the City and TPS have access to the necessary data, including TPS call for service data (e.g. number of calls for service received, diverted) and relevant call for service details to complete effective evaluations of the current and any future pilots; and,

c) ensure planning for future pilot programs are coordinated, involve both the City and TPS, and consider the recommendations from Section A.1 of this report, to ensure they are achieving the desired outcomes in the most efficient and effective way.

Management Response: ☒ Agree   ☐ Disagree
Comments/Action Plan/Time Frame: City: TPS is leading the review of the Gerstein Crisis Centre co-located pilot as the City was not involved in setting up that pilot. The City & TPS are working together on the joint evaluation of the TCCS.

Recommendation 21:

Toronto Police Services Board direct the Chief, Toronto Police Service (TPS), in consultation with the Chief, Toronto Paramedic Services and the Chief Executive Officers (or other appropriate executive liaisons) of Toronto hospitals to:

a) leverage technology and/or the use of data to identify the most appropriate hospital for an officer to transport an individual in custody, with the view of minimizing wait times and travelling the least possible distance.

b) develop police-hospital liaison committees and transfer of care protocols with all hospitals where TPS transports apprehended persons, to minimize wait times and develop protocols to create a workflow which will benefit both TPS and the hospitals.

Management Response: ☒ Agree ☐ Disagree
Comments/Action Plan/Time Frame:
Toronto Paramedic Services: Toronto Paramedic Services has no concerns with this recommendation and will consult with and support Toronto Police Service on these areas.

Recommendation 22:

City Council request the City Manager, and the Toronto Police Services Board direct the Chief, Toronto Police Service (TPS) to work in collaboration to:

a) assess if current call for service diversion strategies to the City, through 3-1-1 Toronto, are working as intended, and if TPS and City staff clearly understand the roles and responsibilities.

   This should include evaluation of call volumes and outcomes at both TPS's Communications Centre and 3-1-1 Toronto for relevant call for service types.

b) assess if there are opportunities to increase call for service diversion from TPS to the City.

Management Response: ☒ Agree ☐ Disagree
Comments/Action Plan/Time Frame:
City: 311 Toronto is supportive of the collaborative approach that is recommended and notes the importance of documenting new and changing processes and identifying subject matter experts so that expectations of response times and resolutions can be communicated to the public.

Recommendation 23:

City Council request the City Manager, and the Toronto Police Services Board direct the Chief, Toronto Police Service (TPS) to work in collaboration to consider through an interface or other means, increasing the information shared between City divisions (e.g. Municipal Licensing and Standards Division, 3-1-1 Toronto, etc.) and TPS on a per call for service basis (e.g. addresses where police respond to noisy parties) so that trends can be identified and the City can help address the root cause of issues that are not police matters.

Before undertaking any data sharing, TPS and the City should perform a legal review, which includes consideration of any relevant privacy considerations, specifically the requirements outlined in the *Municipal Freedom of Information and Protection of Privacy Act.*

Management Response: ☒ Agree   ☐ Disagree
Comments/Action Plan/Time Frame:
City: Both MLS and 311 appreciate this recommendation to share information between systems as this allows for a better understanding of the issues. The importance of reviewing privacy considerations is noted. In addition, the recommendation to look at ways to have an interface and/or backend integration, and ensuring data could be shared in real time is welcome.

Recommendation 24:

City Council request the City Manager, and the Toronto Police Services Board direct the Chief, Toronto Police Service (TPS) to work in collaboration to leverage 2-1-1 Central data in conjunction with call for service data, at an aggregate level, to identify neighbourhoods where there are a high number of low priority calls for service, and where community resources may exist to help divert front-line police resources.

Before undertaking any data sharing, TPS and the City should perform a legal review, which includes consideration of any relevant privacy considerations, specifically the requirements outlined in the *Municipal Freedom of Information and Protection of Privacy Act.*

Management Response: ☒ Agree   ☐ Disagree
Comments/Action Plan/Time Frame:
City Manager's Office: The City Manager will work with the TPS on this recommendation and note the importance of reviewing privacy considerations.

Recommendation 25:

City Council request the City Manager, and the Toronto Police Services Board direct the Chief, Toronto Police Service (TPS) to work in collaboration to consider implementing public awareness campaigns addressing the public's perceptions on people experiencing mental health challenges and/or homelessness and what type of response (e.g. police or non-police response) would be most appropriate.

This process should include mechanisms for campaign evaluation (e.g. key metrics that will be measured), a process for including community engagement in the planning process and determining the most appropriate target audience.

Management Response: ☒ Agree   ☐ Disagree
Comments/Action Plan/Time Frame:
City Manager's Office: The City Manager will work with TPS on this recommendation.

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