



Office of the
Auditor General
City of Ottawa

Audit of the Ottawa Police Service's Response to the Convoy Protest – The Role of the Ottawa Police Services Board



February 2023

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Message from the Auditor General



In January and February 2022, thousands of trucks and protestors from around the country came to Ottawa with what was said to be a protest against COVID-19 vaccine mandates and restrictions. While the effects of this protest were felt across the country, the downtown core of our City was the most impacted. For a city well accustomed to large protests, this was an event unlike any we have ever experienced.

In March 2022, I received requests from both the City Manager and the Ottawa Police Services Board (OPSB) to consider conducting a review of the responses of both the City of Ottawa (the City) and the Ottawa Police Service (OPS) to these events in our nation's capital. As an independent Statutory Officer, I felt it pertinent that I accept the requests and provide, to the oversight bodies and the residents of Ottawa, a depiction of key events and a description of how all parties could improve for similar future events.

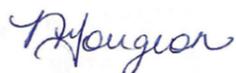
On April 25, 2022, the Government of Canada established the Public Order Emergency Commission to inquire into the circumstances that led to the declaration of emergency that was in place from February 14 to 23, 2022, and the measures taken for dealing with the emergency. Given similar mandates, we chose to reach out to the Commission team to maintain an open line of communication. We continued to consult with other agencies performing a similar scope of work to better refine the focus of our audit and ensure we were adding value to the residents of Ottawa and the OPSB without duplicating efforts.

With the downtown core residents and businesses being the most impacted, my Office embarked on our first ever public consultation from June 2022 to July 2022. To gain a better understanding of how Ottawa residents and businesses were impacted during the protest, we held two virtual consultations, released a survey and allowed those interested to provide direct written submissions to my Office. We received approximately 1,600 responses to our survey, among the highest response rates for a City of Ottawa survey. We are very grateful to those that took the time to share their feedback with us as it greatly assisted my team in the completion of their audit work.

It is important to note when reading the findings in our report, that my Office has the benefit of hindsight. We do our best to apply this lens when setting expectations as to what a reasonable person should have done with the information available to them at the time in question.

I would like to take a moment to thank OPSB staff as well as OPS and City representatives that took the time to provide us with the key information we required to conduct our work and for all their collaboration. I would also like to thank the various experts that took the time to share their expertise with us (see [Appendix 2](#) for a list) as their insights were paramount to the conduct of our work. Lastly, I would like to thank my team for their extraordinary dedication, application of exceptional professional judgement and their steadfast integrity in the conduct of their work.

Respectfully,



Nathalie Gougeon, CPA, CA, CIA, CRMA, B.Comm
Auditor General

Introduction

On March 28, 2022, the Ottawa Police Services Board (OPSB or the Board) requested that the Office of the Auditor General (OAG) consider conducting an audit of the Ottawa Police Service’s (OPS or the Service) response to the convoy protest, including the Board’s roles and responsibilities to handle major events and crisis management. The scope of this report is focused exclusively on the role and activities of the OPSB.

Background and Context

Ottawa Police Services Board

The *Police Services Act*, R.S.O. 1990, c. P.15 (*PSA* or the Act) governs policing in Ontario and establishes the authority and responsibilities of municipal police services boards. Part III, Section 31(1) of the *PSA* states that a “board is responsible for the provision of adequate and effective police services in the municipality¹”. More specifically, police services boards shall:

- a) Appoint the members of the municipal police force;
- b) Generally determine, after consultation with the chief of police, objectives and priorities with respect to police services in the municipality;
- c) Establish policies for the effective management of the police force;
- d) Recruit and appoint the chief of police and any deputy chief of police; and annually determine their remuneration and working conditions, taking their submissions into account;
- e) Direct the chief of police and monitor his or her performance;
- f) Establish policies respecting the disclosure by chiefs of police of personal information about individuals;
- g) Receive regular reports from the chief of police on disclosures and decisions made under Section 49 (secondary activities);
- h) Establish guidelines with respect to the indemnification of members of the police force for legal costs under Section 50;
- i) Establish guidelines for dealing with complaints under Part V, subject to Subsection (1.1); and
- j) Review the chief of police’s administration of the complaints system under Part V and receive regular reports from the chief of police on his or her administration of the complaints system.

The *PSA* establishes that a board can give direction to the chief of police but cannot direct the chief with respect to specific operational decisions or the day-to-day operation

¹ <https://www.ontario.ca/laws/statute/90p15/v30#BK51>

of the police service. The structure of the Act requires that a board and its chief work together to develop objectives and priorities for the provision of adequate and effective policing for the benefit of the community they serve.

For municipalities with larger populations, such as Ottawa, the *PSA* (Section 27) sets out the composition of police service boards. This includes the head of the municipal council (or, if the head chooses not to be a member of the board, another member of council appointed by resolution of the council), two members of council appointed by resolution of council, one person appointed by council (who is not a member of council or an employee of the municipality) and three persons appointed by the Lieutenant Governor in Council, otherwise known as provincial appointees.

Convoy Protest

By mid-January 2022, the OPS was aware that a group that called themselves the “Freedom Convoy” was organizing a demonstration to be held in Ottawa on January 29, asking for truckers and supporters to travel to Canada’s capital from across the country. The group intended to protest COVID-19 vaccine mandates and restrictions, stating that they would not leave until all related restrictions and mandates were repealed. As various convoys travelled across Canada, there was widespread media coverage showing the vast number of vehicles on the road, including many tractor-trailers and other heavy equipment.

The OPS had jurisdictional lead for the overall response to the convoy protest. The Service indicated that their priorities during the convoy included managing traffic issues; keeping the peace and maintaining order while respecting the right to protest; protecting monuments; addressing threatening and/or high-risk behaviours; maintaining emergency routes; and ensuring public, demonstrator, and officer safety.

During this time, protesters were observed engaging in numerous violations of City bylaws, including setting unlawful fires, discharging fireworks, committing noise infractions related to constant honking of horns, blocking and damaging highways, and idling vehicles.

The demonstration caused traffic impacts including blockades and closures of many streets and interprovincial corridors for more than three weeks. Many businesses suffered financial losses during this time. Those living and working in the areas in and around the centre of the protest (known as the “red-zone”) were significantly impacted and many residents did not feel safe in their neighbourhoods. The OAG surveyed over 1,600 City of Ottawa residents regarding the convoy protest. The most commonly reported complaints included noise levels, difficulties accessing transit, diesel fumes, and mental health impacts.

Key dates to consider:

- On the morning of January 28, 2022, the OPS activated the National Capital Region Command Centre to coordinate an inter-agency response to the protest with representatives from the OPS, the Royal Canadian Mounted Police (RCMP), the Ontario Provincial Police (OPP), Parliamentary Protective Service, the Sûreté du Québec, the Service de police de la Ville de Gatineau, the City of Ottawa, Ottawa Fire Services, the Ottawa Paramedic Service, and OC Transpo.
- On January 28, 2022, protestors started arriving for the first weekend of demonstrations.
- During the first weekend from January 28, 2022, through January 30, 2022, over 3,000 trucks and 15,000 protestors were present in downtown Ottawa. While many protestors left at the end of the weekend, a large and committed contingent remained in the downtown core and other sites such as RCGT Park on Coventry Road.
- By February 2, 2022, OPS had declared that it did not have sufficient resources to adequately resolve the convoy protest.
- On February 7, 2022, the OPSB Chair and Ottawa Mayor made a request for 1,800 resources from other levels of government.
- As of February 12, 2022, an Integrated Command Centre (ICC) was established comprising the RCMP, OPP and OPS to coordinate the policing response.
- On February 14, 2022, the federal government declared a public order emergency under the *Emergencies Act*, to end disruptions, blockades, and the occupation of the City of Ottawa.
- By February 20, 2022, authorities cleared much of the City of Ottawa's downtown area of convoy protestors and their vehicles.

According to the OPS, 2,223 resources from other police services were leveraged to support OPS in clearing the protest. A total of 310 arrests were made by the end of the protest.

Audit Objective and Scope

The objective of the audit was to assess whether the OPSB undertook all necessary and appropriate action, leading up to and during the convoy protest, to fulfill its mandate to provide adequate and effective police services in the City of Ottawa.

More specifically, the focus of this audit was to determine whether the OPSB obtained the details necessary to engage in a meaningful consultation with the Chief on matters concerning Board policies and the operational mandate of the OPS in responding to the convoy protest. This included assessing whether the Board's actions were aligned with and satisfied its mandate and oversight responsibilities.

The scope of this audit was limited to OPSB's role in the context of their responsibility of providing adequate and effective police services.

The scope of this audit **did not** include the following:

- The activities of the OPS (planning / operational decisions) or of any other policing agency during the convoy protest;
- The structure of the OPSB and its membership as this is established by the *PSA*; and
- The activities of the City of Ottawa in their planning and response to the convoy protest, as this is the subject of a separate audit.

While the day-to-day activities of the OPSB are not the focus of this audit, the infrastructure supporting the Board in achieving their mandate was included in the scope. Please see [Appendix 1](#) for detailed audit criteria.

During our audit, we engaged with several police services board governance experts. These experts provided critical insights into the role of police services boards relative to the Chief of Police and the police service and further provided best practices for consideration. Profiles of the experts who were consulted with during this audit are included in [Appendix 2](#).

Conclusion

The convoy protest that took place in Ottawa in January and February of 2022 was an unprecedented event facing the OPS which presented unique challenges for the OPSB in ensuring the provision of adequate and effective police services during this time. In the early stages of the protest, the Board did not clearly understand its role relative to a major event. Recognizing this, the Board sought out legal expertise to support and guide them through this rapidly evolving situation.

Attempting to fulfill their mandate, the Board took steps to request operational information and asked questions of the Chief and senior command of the OPS consistently throughout the three-week protest. However, the level of information they were requesting was not provided to the Board until much closer to the end of the convoy protest. Despite their attempts at obtaining the necessary operational details, by not having this information in a timely manner, it impacted their ability to effectively undertake their oversight responsibilities during the convoy protest.

Our audit identified that, during the convoy protest, the Board contravened legislation as well as its own procedural rules, with respect to convening meetings, which resulted in diminished transparency.

As a result of our work, it was further noted that elements of the infrastructure supporting the Board have the potential to impact the overall effectiveness of the Board's governance responsibilities. This includes the skills and expertise of Board members, the orientation and training they are provided, and the support available to them through staff and advisory resources.

Audit Findings and Recommendations

1. OPSB Activities During the Convoy Protest

1.1 Definition of Major Events

While the *PSA* does not specifically outline expectations of a police services board during a significant event, this role has been considered by the Honorable John W. Morden during his 2012 review of the Toronto police activities throughout the G20 Summit (entitled the "[*Independent Civilian Review into Matters Relating to the G20 Summit*](#)", or the "*Morden Report*"). Justice Morden stated that for police service boards to effectively govern, they need to receive sufficient information from the chief of police at "critical points", including operational details. Justice Morden defined a critical point as when a police service is engaged in planning for a major event that is significant and requires advance planning and/or Command-level approval. Justice Morden indicated that during such a critical event, collaboration and information exchange is critical between the chief of police and the police services board for both parties to fulfill their respective roles.

The concept of a critical point was further emphasized in Honourable Gloria J. Epstein's 2021 report titled "[*Missing and Missed: Report of the Independent Civilian Review into Missing Person Investigations*](#)", or the "*Epstein Report*", which reviewed police response to the missing persons investigations in Toronto's LGBTQ2S+ community. Epstein recommended that criteria be developed to determine when a critical point has been reached as well as to define the types of information that a chief of police would share with the board once the critical point is reached.

OPSB policy CR-17 "Major Events" sets out specific expectations for the Chief of Police and the Board during a major event. A "major event" here is analogous to the "critical point" concept from the *Morden Report* and *Epstein Report*. In this policy, a "major event" is defined as an exceptional, out-of-the-ordinary policing operation or event that is characterized by **one or more** of the following [emphasis added]:

- Is a federally designated meeting involving international representatives;
- Involves an "internationally protected person";

- **Will tax the Service's ability to provide regular policing services to the citizens of Ottawa;**
- **Requires resources from other police agencies;**
- **Is a major community event that has the potential to significantly disrupt public peace, order or security; and**
- Is designated as such by the Chief of Police.

Should a situation meet the threshold of a major event as defined above, the policy dictates that the Chief of Police is to ensure that:

- The Board **is informed as soon as is practicable** when there is a reasonable possibility that the Ottawa Police Service may be involved in the policing of a major event; and
- The Board **is provided, at the earliest possible stage, with sufficient relevant operational and other information** to allow it to understand details of the major event, what legislation and other legal requirements may apply to the policing of the major event, the role that other organizations may play, any existing Board policies that may apply, or any new policies that might be required [emphasis added].

For a listing of the relevant obligations of the Chief of Police under this policy, see [Appendix 3](#).

The OPSB's Major Events policy is consistent with the recommendations from the *Morden Report* which concludes that, in order to properly perform its statutory governance obligations, police services boards need to receive adequate information from the Chief of Police. This includes sufficiently detailed operational information, where necessary.

1.2 Timely Notification of the OPSB

Project HENDON is a strategic intelligence source developed by the Provincial Operations Intelligence Bureau of the OPP. Beginning in early 2020, this project developed regular reports with dissemination of intelligence to address matters of criminal extremism and large-scale protests. All HENDON Reports are issued to police stakeholders throughout Ontario, including the OPS. The January 13, 2022 HENDON Report described the upcoming protest as having "the goal to disrupt and further strain the 'already fragile supply chain'; while a larger objective, that of staging a mass protest in Ottawa, is to 'put the fear of God in the politicians' and bring about an end to all COVID-19 public health measures"².

² <https://publicorderemergencycommission.ca/files/exhibits/OPP00001176.pdf?t=1668694318>

This information, which was received by many within the OPS including the Chief of Police, as well as other sources of intelligence, led the OPS to begin planning for the event as of January 13, 2022. The Deputy Chief was then assigned to prepare a Threat Risk Assessment based on the intelligence. At this point, it was likely that the criteria for deeming the upcoming protest a major event (as per the Board's Major Events policy) had been met, specifically:

- An event that could tax the Service's ability to provide regular policing services to the citizens of Ottawa; and
- A major community event that has the potential to significantly disrupt public peace, order or security.

Subsequently, the January 20, 2022 HENDON Report stated that the convoy "may comprise thousands of tractor-trailers"³ and that the "stated intent of some convoy participants is to remain at Parliament Hill until government rescinds all COVID-19 related restrictions". The report also noted that "convoys will almost certainly disrupt the movement of vehicular traffic and goods in Ontario and strain the capacity of law enforcement in the province" and that "even a small number of tractor-trailers parked at Parliament Hill will almost certainly be disruptive in the short term". It added that "police of jurisdiction resources could be stretched if rallies are organized at the local level to coincide with the arrival of the convoys".

Despite the early intelligence received by the OPS, the OPSB Chair was only first informed of the Freedom Convoy by the OPS on January 24, 2022. This was after a regularly scheduled board meeting, where there was no mention of the upcoming convoy protest.

The OPS produced an Intelligence Assessment report on January 25, 2022, that indicated that the event would likely be bigger in crowd size than any demonstration in recent history and would likely cause widespread disorganization and confusion. On January 26, 2022, the OPS made a formal request for external resources, meeting another threshold for a major event. By January 26, 2022, the OPS was in receipt of further OPP intelligence describing that the convoys were planning to stage disruptions that may gridlock areas around Parliament buildings and parts of Ottawa, and that they had no expressed departure date for when participants would disperse, or the action would end.

The full Board was notified of the convoy protest by email on January 25, 2022. The Board was further briefed at the January 26, 2022, special board meeting called by the

³ <https://publicorderemergencycommission.ca/files/exhibits/OPP00001024.pdf?t=1668694318>

Chair. The briefing indicated that this would be a significant and extremely fluid event, and that the Freedom Convoy could arrive as early as Thursday (January 27, 2022) and likely remain through Sunday (January 30, 2022). The OPS at the time stated that this belief was based on the totality of information received and the OPS's experience with protests. The OPS was anticipating numbers in 1,000-to-2,000-person range; however, they indicated that these figures could change.

The Board's Major Events policy includes the clear expectation that the "Board is informed as soon as is practicable when there is a reasonable possibility of a major event". The Board Chair was notified January 24, 2022, and the full Board the following day, only three days before the convoy protestors were scheduled to start arriving in Ottawa, and twelve days after the OPS was first aware of the event. As a result, the Board's ability to fulfil its responsibility of helping to establish the mission, objectives, and priorities of the event response was severely impeded.

1.3 Consultation on the Objectives and Priorities of the Major Event

Section 1.3 of the OPSB's Major Events policy outlines expectations for the development of the mission, objectives, and priorities of the major event. Specifically, the Chief must ensure that the "Board is consulted in determining the mission and appropriate objectives, priorities and policies for the major event". Additionally, Section 1.4 requires the Chief to provide the Board with sufficient information to allow it to ensure that operational plans are consistent with the mission and objectives of the major event.

By January 26 the OPS had an initial operational plan⁴ drafted which included a mission and mission objectives for the convoy protest. The objectives included:

- Prioritizing public safety in all our deployments;
- Maintaining public order and preserving the peace;
- Remaining neutral where possible and facilitating the building of trust between police, participants and the community;
- Ensure the safety and security of the public and emergency services personnel;
- Minimizing disruption for Ottawa residents, businesses, and visitors;
- Identifying and assessing threats and risks and developing contingency plans to mitigate where required;
- Providing security commensurate to the threat level; and
- Enforcing laws and investigating offences where warranted while

⁴ <https://publicorderemergencycommission.ca/files/exhibits/OPP00004261.pdf?t=1668694318>

respecting the democratic freedoms of thought, belief, opinion, expression and peaceful assembly.

The Board was never provided a copy or a detailed briefing of this initial operational plan. To provide this level of information, an in-camera session would likely have been required as part of the January 26, 2022, special board meeting. No in-camera portion of this meeting was scheduled or requested by any member of the Board.

Despite this, through interviews with OPSB Board members who were in place at the time of the convoy protest, members generally felt they were aware of, and in agreement with, the high-level priority to maintain safety of the demonstrators, officers and the community during the first weekend of the protest. During this meeting, Board members and City Councillors asked specific questions on the planning for the operations.

Overall, despite Board members feeling they were generally made aware of some of the objectives and priorities of the OPS of the upcoming convoy protest, they did not receive detailed information on these priorities nor did a fulsome consultation take place. By not having a thorough discussion of the mission and priorities of the event, the Board was unable to fully meet the expectations of the Major Events policy in terms of its responsibility to consult on the mission, objectives, and priorities of the event.

1.4 Access to Operational Information

After the first weekend, it was clear that a significant number of people and vehicles, including tractor-trailers, would be occupying city streets and other areas for the foreseeable future. At this point, the Board sought clarification on their role during a major operational event. The Executive Director of the Board reached out to their Police Services Advisor at the Ministry of the Solicitor General of Ontario to seek guidance on board responsibilities.

An in-camera briefing between the OPS and the OPSB was held on February 1, 2022. There were questions from Board members on negotiations between the police and protestors, enforcement of by-laws and criminal behaviour, as well as the possible establishment of perimeters. Additionally, the Chief and Chair were in regular communication, outside of board meetings. As part of these communications, we understand that the Chair was informed that upcoming operations would be taking place, but no specific details were provided.

During the February 5, 2022, special board meeting, members continued to ask for operational plans and details so that they could execute their oversight responsibilities. Board members then asked to go in-camera in order to obtain detailed information and

asked the OPS how best to support the police service. At this stage, the Chief raised the need for other levels of government to step in, stating that all available units in the province could be required to execute operations. On February 7, 2022, the OPSB Chair and Mayor of Ottawa sent a formal request for officer resources to the Premier and Solicitor General of Ontario as well as the Minister of Public Safety and the Prime Minister; requesting 1,800 additional resources to clear the protestors from the streets of Ottawa.

Becoming increasingly frustrated with the lack of operational details being provided by the Chief of Police, the Board sought legal advice as to their options. The OPSB's legal counsel as well as the Police Services Advisor from the Solicitor General Office of Ontario confirmed the Board's right to contribute to setting priorities and the right to receive operational information to verify consistency with these objectives. The Chair also looked to peer boards, such as the Toronto Police Services Board (TPSB), for examples of the level of information they would require to properly discharge their responsibilities.

It is our understanding that as of February 13, 2022, the Integrated Command Centre had been established and the operational plan to end the occupation had been signed off by the OPS, the OPP and the RCMP. The OPSB was not provided this plan or a briefing of its contents during its development or upon its approval.

After the resignation of the Chief and the appointment of the Interim Chief, at an in-camera session on February 17, 2022, the OPS provided a detailed overview of the final operational plan of the integrated command. At this point the Board was able to challenge specific details of the planned operation.

During a major event, the Board cannot adequately perform its oversight functions unless it is provided with relevant and appropriate operational information as soon as the information is available. Timely sharing of this information from the Chief of Police to the OPSB is therefore crucial to the Board's ability to carry out its role. As the Board was only provided with sufficient relevant operational information towards the end of the convoy protest, it was challenging to effectively perform their oversight responsibilities and ensure adequate and effective policing throughout the major event. More specifically, without the operational details the Board was requesting, they would not have been able to ensure that operational plans were consistent with the mission and objectives of the major event.

RECOMMENDATION 1 – ENHANCE POLICIES FOR SHARING RELEVANT INFORMATION DURING MAJOR EVENT

The Board should review and update the Major Events policy and other related Board policies to clarify expectations on the collaboration between the Board and the Chief of Police and the dissemination of intelligence and sharing of operational plans during a major event. The Board should ensure they are consulted when mission, objectives, and priorities are developed in the early stages of a major event.

BOARD RESPONSE 1

The Board agrees with this recommendation.

The Board, through its Policy and Governance Committee, will review its Major Events policy and related Board policies. The review will seek to further clarify expectations regarding collaboration between the Board and the Chief of Police, and the dissemination of intelligence and briefing on operational plans, during a Major Event. The Committee will look at best practices undertaken by boards of large police services.

The Board, through its Policy and Governance Committee, will also develop clear direction on how the Board expects to be consulted on mission, objectives, and priorities in the early stages of a Major Event. This direction will be included as part of the Major Events policy.

The Board will consult with the Chief of Police as part of the above review.

This review process will be completed by the end of Q3 2023.

RECOMMENDATION 2 – ALIGNMENT OF EXPECTATIONS BETWEEN THE BOARD AND THE CHIEF

With the onboarding of any new Chief of Police (and on an ongoing basis), the Board should ensure their expectations with respect to major events and related policies are communicated and clearly understood.

BOARD RESPONSE 2

The Board agrees with this recommendation.

The Board completed the recruitment of a new Chief of Police in November 2022. The Board will be involving the current Chief in its discussions and review of its Major Events policy, and other related policies. This will help to ensure alignment

and understanding of Board expectations and will also provide the Chief of Police with an opportunity for input.

The Board, through its Human Resources Committee, will also review the performance evaluation process for the Chief of Police (as well as Deputy Chief of Police and Chief Administrative Officer) to ensure there is an ongoing monitoring and evaluation component associated with the Chief of Police meeting the expectations of the Board with respect to Major Events and related policies.

This process will be completed by the end of Q4 of 2023.

As part of any future onboarding of a new Chief of Police, the Board will provide a copy of the Board's Policy Manual in keeping with current practice.

1.5 The OPSB Role in Hiring Interim Chief

The OPS Chief of Police informed the Chair of his resignation on February 15, 2022, which was during the height of the convoy protest. A special board meeting was convened on that day to discuss the selection of an interim chief. Under the *PSA*, appointing a Chief is one of the Board's critical functions and the police service must have at least an Interim Chief at all times. Legal advice was also sought in the selection process of an Interim Chief.

The Chair suggested to the Board that they consider an outside candidate for Interim Chief to execute the plan to clear the convoy protest. The Chair's primary rationale was that the senior command was already heavily taxed due to vacancies and that leveraging an existing executive would put more pressure on the fragile structure. According to Board minutes, legal counsel present at the meeting, was supportive of this approach. As a temporary measure, it was decided to appoint the Deputy Chief as Interim Chief pending the appointment of a suitable outside candidate.

Given the time constraints, the Board was comfortable with proceeding with hiring an external candidate as Interim Chief and agreed unanimously to delegate the hiring authority and contract negotiations to the Chair. The idea was to bring an Interim Chief in temporarily to execute the operational plan and then proceed with the full recruitment process for a permanent Chief of Police after the protest ended.

While potential Interim Chief external candidate names were obtained and discussed in-camera with the full Board, neither the Human Resources Committee nor the Board was involved in the vetting process or establishing the criteria for selection. The Chair was delegated responsibility to contact a limited number of potential candidates; however, no evidence could be provided to demonstrate the extent to which this vetting of the

candidates took place. Once the Chair selected a candidate, a contract was established and signed with a new Interim Chief of Police.

Under the *PSA* Section 34, the Board is allowed to delegate responsibilities conferred on it by the Act to **two or more** members. Appointing Chiefs and Deputy Chiefs are key functions of police services boards. In this case, there was limited transparency or ability for input/challenge in the selection and hiring of the external Interim Chief and the delegation of authority was not compliant to the *PSA*.

RECOMMENDATION 3 – HIRING A CHIEF OF POLICE

In cases when a non-standard hiring process is employed, the Board should ensure that sufficient due diligence and transparency is maintained to ensure the full Board is aware and supportive of such critical decisions. Additionally, if necessary, ultimate decisions should be delegated to at least two members of the Board to be compliant with Section 34 of the *PSA* and to allow for sufficient challenge of such decisions.

BOARD RESPONSE 3

The Board agrees with this recommendation.

The Board will ensure that a non-standard hiring process is only considered in a situation of urgency. The Board will also ensure that in cases when a non-standard hiring process is employed, sufficient due diligence and transparency is maintained to ensure that all of the Board members are clearly aware and supportive of the Board's decisions.

Additionally, if necessary, any Board decisions will be delegated to at least two members of the Board to ensure compliance with Section 34 of the *PSA*.

The Executive Director will assist the Board in ensuring compliance with its use of delegated authority in accordance with Section 34 of the *PSA*.

1.6 Dissemination of Information from the Chair to the Board

During a fluid event such as the convoy protest, it is not always practicable to convene the full Board whenever information needs to be shared. Throughout the convoy protest, the Chief of Police shared information directly with the Board Chair. It was the Chair's role to disseminate, to the Board, any significant information needed to enable the Board to make decisions or to discharge its oversight responsibilities.

Interviews with Board members indicated that some did not feel that the Chair was disseminating all significant information she had received to the full Board during the convoy protest. This was further corroborated during the Public Order Emergency Commission by the OPSB's Police Service Advisor from the Ministry of the Solicitor General of Ontario, who indicated that the Chair informed him that she did not share all the OPS information with the Board.

Without all such information being made available to the full Board during the convoy protest, individual Board members would be challenged to effectively discharge their oversight responsibilities.

RECOMMENDATION 4 – DISSEMINATION OF INFORMATION FROM CHAIR TO BOARD

The Board should formalize, by written policy, its expectations related to dissemination of information by the Chair to the full Board. This should include the nature and extent of the information as well as the mechanism and timing of dissemination of that information.

BOARD RESPONSE 4

The Board agrees with this recommendation.

The Board, through its Policy and Governance Committee, will develop a new Board policy concerning expectations related to the dissemination of information by the Chair to the full Board.

The policy will include the nature and extent of the information as well as the mechanism and timing of dissemination of that information.

The Committee will review best practices of other boards of large police services as part of its policy development process.

This recommendation will be completed by the end of Q4 2023.

2. Board Procedures and Legislative Issues

2.1 Legal and Procedural Rules for Board Meetings

2.1.1 Special In-Camera Meetings

Under Section 35(3) of the *PSA*, notice of board meetings must be published in the manner the Board determines and, subject to section 35(4), conducted publicly to allow

citizens to observe or participate. Section 35(4) provides that the Board may exclude the public from all or part of a meeting if all or part of the meeting involves matters of public security, or intimate financial, or personal matters.

The OPSB is also subject to its own Procedure By-Law⁵ which governs board proceedings and business, and which contains similar provisions to those found in Sections 35(3) and 35(4) of the *PSA*.

When the Board decides to close all or part of a meeting to the public, the By-Law provides that this is to be done by resolution made in the public portion of the meeting. The resolution to move into closed session must disclose the time and fact of the holding of the public meeting, and the general nature of matters to be considered in the closed meeting. This is the case for regular meetings under Section 30(1) of the By-Law, and for special meetings under Section 4(9).

On February 1, 2022, the Board met for a special, in-camera meeting. This meeting was not publicly announced. It did not start in public and then move to closed session by resolution. It was not open to the public at any point. Each of these are contraventions of the Board's Procedure By-Law Sections 4(9) and 29(1).

On February 11, 2022, the Board held a Special Meeting. After the public portion of the meeting, the Board moved to closed session without a motion or notification of the closed meeting reflected publicly, which again violated Procedure By-Law Section 4(9).

On February 15 and 17, 2022, the Board held in-camera sessions after the public meetings. While these closed sessions were properly announced in public, the general nature of the matters discussed and decided upon were not publicly stated as required by Section 4(9)(b) of the Board's Procedure By-Law. This is especially relevant because motions were passed during the February 15, 2022 in-camera meeting.

2.1.2 Emails Constituting Quorum

Both Section 35(2) of the *PSA* and Section 5(1) of the Procedure By-Law state that a majority of the members of the Board constitutes a quorum. This means that, in the case of the OPSB, four or more members of the Board constitutes quorum. Throughout the convoy protest, a quorum of Board members exchanged many emails. In these emails, Board members shared information and asked questions amongst themselves, as well as with the OPS and legal experts. According to legal precedent (*Leeds and the Thousand Islands (Township of) (Re)*, 2016 ONOMBUD 15⁶; and *Employee v. Bays et*

⁵ https://ottawapoliceboard.ca/opsb-cspo/sites/default/files/docs/psb_procedure_by-law_3_of_2014_amended_by_by-laws_1_2_of_2016_and_motion_of_16april2020_.pdf

⁶ <https://www.canlii.org/en/on/onombud/doc/2016/2016onombud15/2016onombud15.html>

al., 2022 ONMIC 13⁷) emails can constitute a board meeting if they are sent to or exchanged with a quorum of members and if the substance of the emails lays the groundwork for future decision making or materially advances board business. The OAG consulted with legal experts in police governance and confirmed that this threshold was met on several occasions. As a result, the exchange of emails by a quorum of the Board, which materially advanced Board business (and were therefore, deemed meetings) contravened Section 35(3) of the *PSA* and Sections 4(9) and 29(1) of OPSB's Procedure By-Law. The contraventions arise from not announcing the meetings, not passing public motions to hold the closed meetings and not disclosing the general nature of matters to be considered in closed session.

While it is understandable, in such circumstances, that the Board was seeking opportunities to work expeditiously, these actions constituted a basic violation of procedural rules and legislation which are in place to promote public transparency of police board business.

RECOMMENDATION 5 – ADHERING TO BOARD PROCEDURE BY-LAWS AND LEGISLATION

The Board should seek out legal expertise, on an ongoing basis, to confirm that its activities and decisions are in accordance with its legislative and procedural requirements.

BOARD RESPONSE 5

The Board agrees with this recommendation.

The Board regularly consults the Board Solicitor as well as external counsel for legislative and procedural advice and will continue this practice and ensure there is no conflict of interest as per recommendation six.

The Board is currently undertaking a review and update of its Procedure Bylaw to ensure it is up to date, is reflective of current practices, appropriately adopts lessons from past events and assists the Board in performing its governance and oversight responsibilities effectively and efficiently. External counsel has been consulted as part of this process.

This review is expected to be completed by the end of Q1 2023.

2.2 City Solicitor Advice to the Board

The City Solicitor for the City of Ottawa has historically made himself available to provide legal advice to the OPSB in situations where it would not cause a conflict in his

⁷ <https://www.canlii.org/en/on/onmic/doc/2022/2022onmic13/2022onmic13.html>

role as legal counsel for the City. During the convoy protest, the City Solicitor was present during board meetings, both public and in-camera. The Board also sought advice from independent legal counsel during the convoy protest on their role as well as for key decisions.

It is not unusual for police boards in Ontario to use a municipal solicitor to provide advice on routine matters. However, situations could arise where advising the Board could place the City Solicitor in a conflict-of-interest position vis-à-vis their primary role as legal counsel for the municipality. This could include situations where the solicitor may become privy to privileged information that could impact decision making for both parties. Consistent with this, the *Morden Report*, recognizing the potential for conflicts, recommended that the TPSB should have its own counsel whose legal services are not available to either the Toronto Police Service or the City of Toronto.

During the convoy protest, while the City Solicitor provided limited advice to the Board, he did review the Interim Chief's contract and was present for many decisions the Board made. Subsequent to participating in the in-camera meeting about hiring an external Interim Chief, the City Solicitor provided input on a motion to remove the Chair and one other Council member from the Board. This was as a result of Council's loss of confidence in the Chair and the decisions of the Board, such as the hiring of an external Interim Chief. It is our understanding that the City Solicitor reviewed the motion, as part of his regular duties, and provided input based on his knowledge of the *PSA* and respective by-laws.

While we do not believe there was any intention to influence the process, it is the OAG's opinion, supported by an external legal opinion, that there is, at a minimum, a perceived conflict of interest with the execution of these tasks.

RECOMMENDATION 6 – POTENTIAL CONFLICTS OF INTEREST

The Board should, at a minimum, review the role of the City Solicitor and outline instances in which it would be inappropriate for the City Solicitor to provide advice or be present in meetings where there is the potential for a perceived or actual conflict of interest given the City Solicitor's role as legal counsel for the City. This review could include performing a cost-benefit analysis of retaining regular, independent, Board counsel moving forward to eliminate the potential for perceived or actual conflicts of interest.

BOARD RESPONSE 6

The Board agrees with this recommendation.

The Board, through its Policy and Governance Committee, will conduct a review of the Board's Legal Services policy.

As part of this review, the Committee will consider the role of the City Solicitor and outline instances in which it would be inappropriate for the City Solicitor to provide advice or be present in meetings where there is the potential for a perceived or actual conflict of interest given the City Solicitor's role as legal counsel for the City. This will be formalized as part of the Board's Legal Services policy.

The Committee will also conduct a cost-benefit analysis of retaining regular, independent Board counsel moving forward to eliminate the potential for perceived or actual conflicts of interest.

This recommendation will be completed by the end of Q4 2023.

3. Board Competency and Training

3.1 Selection and Appointment of Board Members

The OPSB has set expectations for identifying skills and experience for Board members. These are found in Policy GA-2 – Board Competencies/Skills Composite. This policy requires that Board members collectively possess skills and experience in a wide range of subjects including business management, strategic planning, financial literacy/accounting, governance, and policy making. They are required to have personal attributes to allow them to function in a consensus driven group and be representative of the community they serve.

Despite the Board having determined the optimum skills and expertise to effectively govern the OPS, a detailed mapping between these and actual skills and expertise of Board members has not been performed. Without such an exercise, the Board is not aware of attributes which might be missing for which support through training and/or advisors might be necessary. This type of assessment would be valuable in identifying priority skills and experiences when new members are appointed.

We understand that historically the Board has never proactively requested of City Council specific skills or attributes of the Councillor Board members and the Council-selected member that would best support the mandate of the Board. Further, we understand that the Board has not proactively requested key qualities from the Province of Ontario for the provincial appointees to the Board. Without proactively seeking out the

skills and attributes necessary to effectively govern a police service, the selected members may be more challenged in undertaking the expected responsibilities under the *PSA*.

RECOMMENDATION 7 – ANALYSIS OF BOARD COMPETENCIES

The Executive Director, in collaboration with Board members, should conduct an analysis of board competencies against the policy expectations to identify any gaps and consider options for bridging these gaps through specialized training and/or advisory support.

BOARD RESPONSE 7

The Board agrees with this recommendation.

The Executive Director, in collaboration with Board members, will be directed to undertake an analysis of board competencies and compare the skills and expertise of Board members to the Board's competency and skills composite, as outlined in its policy.

The Executive Director will use the analysis to identify any possible gaps and bring forward options for bridging these gaps through specialized training and/or advisory support.

This recommendation will be completed by the end of Q4 2023.

RECOMMENDATION 8 – BOARD MEMBER APPOINTMENTS

Leading up to the appointment of new Board members by either Council or the Province of Ontario, the Executive Director should proactively indicate the optimum skills, expertise and experience for potential candidates that would complement the existing Board.

BOARD RESPONSE 8

The Board agrees with this recommendation.

The Executive Director will be directed to track the various appointment terms of Board members so that, leading up to the appointment of new Board members by either Council or the Province of Ontario, the Board can proactively indicate the optimum skills, expertise and experience for potential candidates that would complement the existing Board. This tracking will commence in Q1 2023.

The Executive Director will leverage the inventory of Board member competencies and skills referenced in response 7 to assist the Board in fulfilling this recommendation on an ongoing basis.

3.2 Time Commitment for Board Members

Board members are required to commit a significant amount of time to their OPSB role. While every member's participation will vary, we understand that the expected time commitment is between 25 and 40 hours per month. For the Chair, the average time spent on their role would be approximately 80 hours per month. Some former Board members expressed that this was an underestimate of their efforts. In addition, the Chair of the OPSB has historically been a City Councillor, requiring them to complete these hours over and above any constituency, committee and Council related duties. In comparison, the TPSB employs a full-time external chair to ensure they have sufficient time to perform their oversight responsibilities.

In order to properly oversee the provision of adequate and effective police services, the Chair must be able to devote sufficient time to their role. Not having sufficient time allocated to their Board responsibilities could impact the effectiveness of the oversight activities.

RECOMMENDATION 9 – TIME COMMITMENT FOR CHAIR AND BOARD MEMBERS

When appointing a Chair, the Board should consider the expected workload as compared to the candidates' portfolios/commitments.

The Executive Director, in collaboration with the City Clerk's Office, should ensure that members of Council are made aware of the likely time commitment prior to any appointments being made, so that Councillors appointed to the OPSB can determine if they will have sufficient time to execute their roles and responsibilities once appointed.

In addition, job descriptions for Board members as well as the Chair and Vice-Chair should be reviewed and amended to ensure they accurately reflect the time commitment required.

BOARD RESPONSE 9

The Board agrees with this recommendation.

City Council recently passed a motion to increase the compensation for the Police Services Board Chair, should they be a Public Member, to \$54,000. City Council has also recommended that the Board appoint the Public Member as the Chair,

recognizing that the position of chair requires a substantial personal commitment of time and resources.

The Board will be undertaking the annual election for the Chair and Vice Chair, following the appointment by City Council of a new Public Member. In doing so, the Board will take into consideration the expected workload as compared to the candidates' portfolios/commitments.

The Board, through its Policy and Governance Committee, will review the Board's Policy on Board Member Job Descriptions to ensure it accurately reflects the time and commitment required of Board members, as well as the Chair and Vice Chair. This will be completed by the end of Q3 2023.

The Executive Director, in collaboration with the City Clerk's Office, will be directed to ensure that as part of the City's nomination processes for Boards and Committees, members of Council are made aware of the likely time commitment required of a Police Board member, so that Councillors interested in sitting on the Board can assess if they will have sufficient time to execute their roles and responsibilities once appointed. This recommendation will be completed as part of the next appointment process for City Council members, following the municipal election in 2026, unless a Council appointment becomes available sooner, at which point, it will be completed as part of the required nomination process.

3.3 Board Training

Section 31(5) of the *PSA* obligates each police services board to ensure that all its members undergo any training that the Solicitor General may approve or require. While there is no specific training that is currently mandated by the Solicitor General, the draft *Community Safety and Policing Act, 2019*, S.O. 2019, c. 1, Sched. 1 (not yet in force) which is intended to replace the *PSA*, sets the expectation that more guidance on Board training will be forthcoming.

Pursuant to Section 31(5) of the *PSA*, the Board has established Policy GA-3 – Board Training which outlines the OPSB member training requirements to include both Ministry and internal training, as well as training from other police organizations and *Accessibility for Ontarians with Disabilities Act, 2005*, S.O. 2005, c. 11 (*AODA*) training.

All new Board members are provided with an initial orientation consisting of a review of roles and responsibilities with the Executive Director of the OPSB and the City Solicitor with the opportunity to ask questions. Board members are provided with opportunities for ongoing development through conferences and webinars organized by the Ontario

Association of Police Services Boards and the Canadian Association of Police Governance.

Past and current Board members interviewed indicated that the orientation and training provided from the outset of their appointment does not adequately prepare them to fulfill their obligations as a board member of a police services board. Members are expected to have varying knowledge, skills, and commitment to excellence in various areas such as complex principles of community safety, law enforcement, labour relations and civilian oversight. This includes knowledge about the Board's direction/relationship to the Chief of Police, the Police Associations, the City of Ottawa, and various oversight bodies such as the Solicitor General, and the Ontario Civilian Police Commission which is required to effectively fulfill their responsibilities as a Board member. The existing orientation materials and information sessions do not provide Board members a sufficient depth of background or an understanding of their role and associated expectations.

Without sufficient training and expertise, Board members may not fully understand their roles and responsibilities and may not be effective in discharging their responsibilities.

RECOMMENDATION 10 – NEW BOARD MEMBER/COUNCIL ORIENTATION

The Executive Director, with the support of Board members, should review and enhance the new Board member orientation program, including additional focus on roles and responsibilities. As part of this, clarity should be provided on the role and responsibility of Councillors who sit on this independent Board.

BOARD RESPONSE 10

The Board agrees with this recommendation.

The Executive Director will be directed to develop an enhanced orientation program for new Board members, in consultation with Board members. The orientation program will provide clarity on the role and responsibility of Councillors who sit on the Board.

This recommendation will be completed by the end of Q4 2023.

3.4 Support to the Board

The OPSB is supported by a limited staff of an Executive Director and a Board Assistant. The Executive Director supports and manages all business of the OPSB including implementation of Board strategies and managing financial and human

resources. To the extent necessary, the Board will also leverage consultants to support their activities. This includes legal counsel and at times, communications expertise.

In stark contrast, the TPSB staff is supported by multiple advisors and administrative staff that assist their board in their work – a total of eight positions. While Toronto is a larger city than Ottawa, being the nation's capital, it is faced with many significant events and could require the same level of police services oversight as a city like Toronto.

The audit identified that a significant amount of the Executive Director's time is occupied with board administration/operational activities, and as a result, there is insufficient time to focus on strategic matters and related guidance to the Board. Due to the existing workload, it was noted that the Executive Director has been unable to consistently undertake strategic activities including community engagement and consultation and policy review and interpretation. This could result in ineffective strategic planning and decision-making.

RECOMMENDATION 11 – BOARD STAFF

The Board, in collaboration with the Executive Director, should review the resourcing requirements of the OPSB staff to ensure there is adequate resourcing to support the Board in the execution of their statutory responsibilities.

BOARD RESPONSE 11

The Board agrees with this recommendation.

The Board is in the process of requesting funding through the 2023 draft budget for additional resources.

The Board, through its Human Resources Committee and in collaboration with the Executive Director, will further review the resourcing requirements of the OPSB staff to ensure there is adequate resourcing to support the Board in the execution of its statutory responsibilities. This will include conducting a needs assessment and reviewing the staffing complement at other large boards, such as the Toronto Police Services Board.

This recommendation will be completed by the end of Q3 2023.

It is important to note that the OAG has not audited the content of the Board's responses to our recommendations for accuracy. These responses are direct comments

from the Board. The status and completion of the recommendations will be assessed by the OAG at a later date.

Appendix 1 – About the Audit

Audit Objective and Criteria

The objective of the audit was to assess whether the OPSB undertook all necessary and appropriate action, leading up to and during the convoy protest, to fulfill its mandate to provide adequate and effective police services in the City of Ottawa.

More specifically, the focus of this audit was to determine whether the OPSB obtained the details necessary to engage in a meaningful consultation with the Chief on matters concerning Board policies and the operational mandate of the OPS in responding to the convoy protest. This included assessing whether the Board's actions were aligned with and satisfied its mandate and oversight responsibilities.

Criteria listed below are organized by the timeline of activities and were based on our assessment of the key responsibilities of the OPSB.

1. Infrastructure Supporting the OPSB in its Role

- 1.1 OPSB members had the necessary background and experience to fulfill their legislated duties relative to the convoy protest.
- 1.2 OPSB members were provided sufficient training and ongoing education to support them in fulfilling their legislated duties relative to the convoy protest.
- 1.3 The OPSB was provided the necessary technical support during the convoy protest to adequately fulfill their legislated duty relative to the convoy protest.

2. Activities of the OPSB During the Convoy Protest

- 2.1 The OPSB obtained sufficient information and challenged/recommended actions to the Chief of Police on the planned operational response to the convoy protest.
- 2.2 There was sufficient information available to individual Board members and associated collaboration relative to decisions made by the Board in support of the response to the convoy protest.
- 2.3 The OPSB communicated effectively with stakeholders in support of the OPS's convoy protest response.

Audit Approach and Methodology

Audit staff performed the following procedures to complete this audit:

- Reviewed relevant documents (e.g., meeting minutes, correspondence from custodians, media releases, memos to the OPSB / Council);
- Interviewed and performed walkthroughs with stakeholders from the OPS, the OPSB and related organizations;
- Performed detailed reviews and testing;
- Interviewed with subject matter experts on the role of the Board and comparisons to other events; and
- Performed other analysis and tests, as deemed necessary.

Appendix 2 – Subject Matter Expert Profiles

The audit leveraged subject matter expertise throughout the project. We are appreciative of the support provided by these individuals with extensive expertise of police services board governance. Profiles for each are outlined below.

Woodward B. McKaig, B.A., LL.B.

Mr. McKaig is the Managing Partner at Sullivan Mahoney LLP. He is currently general counsel to both the Regional Municipality of Niagara Police Services Board and the Peterborough Police Services Board where he provides legal and strategic advice on a variety of matters, including labour relations, collective agreement negotiations, interest and rights arbitrations, Ontario human rights cases, policing issues, licensing and administrative law matters.

Michael Kempa, B.A., M.A, Ph. D.

Mr. Kempa is an associate professor in the Department of Criminology at the University of Ottawa. Professor Kempa's work focuses on emerging trends and developments in policing around the world, including with respect to the mechanisms used to govern the police. Professor Kempa's academic teaching and writing also concerns the areas of global trends in political economy, public policy and institutional responses to the practical design and implementation of programs for public and private sector agency reform. Professor Kempa was an expert witness as part of the Independent Civilian Review into Matters Relating to the G20 Summit led by Commissioner Morden.

Ryan Teschner, B.A., LL.B

Mr. Teschner is a leader in community safety, police governance and public administration in Ontario. Mr. Teschner currently serves as the Executive Director and Chief of Staff for the Toronto Police Services Board, which governs and oversees the fourth-largest municipal police service in North America. He has earned a reputation for leading high-profile and successful reforms in the community safety, justice and social sectors. He served as Special Counsel to the Deputy Minister of Community Safety and Correctional Services, as well as at the Ministry of the Attorney General, where he successfully designed and led the development of Ontario's new policing and oversight legislation, as well as other significant initiatives that modernized policing in the province. As a lawyer, Ryan served as lead counsel to the Honourable John W. Morden in the Independent Civilian Review into Matters Relating to the G20 Summit, a leading authority in Canada and internationally on the subject of effective police governance.

Alok Mukherjee, Ph. D.

Mr. Mukherjee is a Canadian academic, human rights advocate, and public servant. He served as chair of the Toronto Police Services Board from 2005 until his July 2015 retirement. He is currently appointed "distinguished visiting professor" at Toronto Metropolitan University. On March 24, 2018, Mukherjee, co-authored with Tim Harper, published *Excessive Force*, a book about the present and future of policing in Canada. At the federal level, Mr. Mukherjee served as President of the Canadian Association of Police Boards.

Appendix 3 – Excerpts from OPSB Policy CR-17 - Major Events

Definition

A Major Event is defined as an exceptional, out-of-the-ordinary policing operation or event that is characterized by one or more of the following:

- a) Is a federally designated meeting involving international representatives
- b) Involves an “internationally protected person”
- c) Will tax the Service’s ability to provide regular policing services to the citizens of Ottawa
- d) Requires resources from other police agencies
- e) Is a major community event that has the potential to significantly disrupt public peace, order or security
- f) Is designated as such by the Chief of Police

Board Policy

1. Communication & Consultation with the Board

It is the policy of the Ottawa Police Services Board with respect to the planning and policing of Major Events that the Chief of Police will ensure that:

1. The Board is informed as soon as is practicable when there is a reasonable possibility that the Ottawa Police Service may be involved in the policing of a major event.
2. The Board is provided, at the earliest possible stage, with sufficient relevant operational and other information to allow it to understand details of the major event, what legislation and other legal requirements may apply to the policing of the major event, the role that other organizations may play, any existing Board policies that may apply, or any new policies that might be required.
3. The Board is consulted in determining the mission and appropriate objectives, priorities and policies for the major event. Once these have been defined, the Police Service will maintain the autonomy to develop and execute the appropriate operational plans.
4. The Board is provided with sufficient information to allow it to ensure that operational plans:
 - a. Are consistent with the mission and objectives;

- b. Are consistent with applicable Board policies; and
- c. No additional policies are required to provide guidance to the Police Service.

Through this review process the Board may provide recommendations to the Chief where it believes the mission, objectives and priorities are not being achieved. However, the Chief remains free to accept or reject the Board's recommendations.

5. The Board is advised of what mechanisms exist to capture, during the planning process, the input of those who will have operational decision-making responsibilities during the event, and what testing of the operational plans will be conducted before the event.

6. The Board is advised of continuity of service plans so that it can assure itself that the rest of the City will be adequately and effectively policed during the major event.

7. The Board receives confirmation that a complete operational plan has been created that addresses all applicable policies and procedures.

8. The Board is provided with regular updates on the progress of the Ottawa Police Service's planning for the policing of the event.

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