



Report
Staff Report
The Corporation of the City of Brampton
6/5/2024

Date: 2024-06-05

Subject: **Budget Amendment and Recommendation Report – Enforcement Operational Review Implementation Plan**

Secondary Title: **Initial Implementation Report**

Contact: Robert Higgs, Director, Enforcement and Bylaw Services

Report number: Legislative Services-2024-480

RECOMMENDATIONS:

1. That the report from Robert Higgs, Director, Enforcement and Bylaw Services, to the Committee of Council Meeting of June 5, 2024, re: Enforcement Operational Review Implementation Plan, be received;
2. That Council approve, twenty-six (26) full-time, permanent complement consisting of seventeen (17) Enforcement Officers, five (5) Property Standards Officers, one (1) Training Supervisor, one (1) Escalation & Communications Supervisor, one (1) Analyst and one (1) Zoning Plans Examiner, and fourteen (14) part-time, permanent Enforcement Officers, to be hired in 2024 with a net annual operating cost of approximately \$1,735,103;
3. That a budget amendment be approved and a new capital project be established in the amount of \$744,000 for twelve (12) compact pickup trucks, with funding to be transferred from Reserve Fund #4 - Asset Replacement.
4. That a budget amendment be approved and a new capital project be established in the amount of \$70,000 for technology equipment required for new staff, with funding to be transferred from Reserve Fund #4 - Asset Replacement.

OVERVIEW:

- This report outlines a “Stabilization Staffing Model” that will allow for the sustainable review and subsequent implementation of the 28 recommendations in the Enforcement Operational Review.

- This report provides status updates, and anticipated reporting timelines, on the 28 recommendations contained in the Enforcement Operational Review.
- This report recommends an increase to the fleet allotment for Enforcement and Bylaw Services to ensure that the newly approved complement can be efficiently deployed into the community.
- This report recommends establishing an annual reporting process to Council, beginning in Q4 of 2024.
- This initiative requires the approval of twenty-six (26) full-time, permanent and fourteen (14) part-time permanent complement at a cost of approximately \$3,672,991 annually, to be partially offset by an estimated \$2,033,888 in revenues, for a net annual operating cost of \$1,735,103.
- Capital budget amendments in the amount of \$744,000 for twelve (12) compact pickup trucks and \$70,000 for technology for new staff are required with funding to be transferred from Reserve #4 – Asset Replacement.

BACKGROUND:

- On April 24, 2024 Council received the report entitled Enforcement Operational Review Findings and Recommendations (CW153-2024 - [CLICK for Report](#))
- Council directed staff to design a phased plan for implementing the recommendations outlined in the Enforcement Operational Review; and, report back to Council with a detailed implementation plan including the associated financial implications.

CURRENT SITUATION:

The Operational Enforcement Review provided 28 recommendations that were then subdivided into the three categories of:

- Technological Advancements,
- Practices, and
- Culture

Attachment #1 “Recommendations Status Update May 1, 2024” briefly outlines the initial assessment of each recommendation and provides a summary of the resultant implementation efforts and timelines. The following legend has been utilized to assist in identifying the status of each recommendation:

- Green: recommendations that have been implemented and are ongoing. Next update will be Q4, 2024.
- Yellow: recommendations that are a joint initiative with other City of Brampton stakeholders and/or require further research to assess viability and next steps. Next update will be Q4, 2024.
- Orange: recommendations reliant on the Capital funding budgetary process.
- Blue: recommendations reliant on the Stabilization Staffing Model. Next update will be Q4, 2024.
- Red: recommendations being shelved until the other recommendations are fully implemented. Next update will be Q4, 2025.

Foundational efforts have already been initiated on 17 of the 28 recommendations. It must be noted, however, that these efforts are using existing resources. Enforcement Officers from all areas are being utilized in these efforts for the dual purpose of drawing upon their subject matter expertise and to ensure they are engaged in the process. This approach directly addresses *Recommendation #22 Focus on Staff Morale*, by them demonstrating their value and having their voice heard. Unfortunately, this is not a sustainable model as it draws officers away from their core duties. *Recommendation #28 Address Unavailability of Enforcement Officers* highlights that the current staff level is insufficient in meeting existing demands, let alone accommodating additional tasks.

Staffing levels are addressed in multiple sections of the report, with two particular areas being:

1. In the “Recommendations” preamble: “...an increase in Enforcement Officers is required to stabilize the organization and to be in a position to begin implementation of the recommendations.” And,
2. *Recommendation #27 Determine Staffing Requirement*: paraphrased direction to use appropriate metrics to determine appropriate staffing levels.

These two points highlight that stabilization is necessary before achieving the significant efficiencies expected from implementing the remaining recommendations.

Key recommendations that address SOPs, processes, and partnerships with COB stakeholders (311Brampton, I.T., etc.) will also provide essential metrics that will aid in subsequent staffing assessments.

The current staffing model includes the following dynamics:

- The churn rate for full-time Enforcement Officers is greater than what the current part-time Enforcement Officers’ staffing level can support:
 - Currently, part-time officers are only assigned to night shifts as the staffing level cannot support a two-shift model. The overnight shift issues 70% of all penalty notices, coinciding with the peak volume of service requests, particularly between 2 am and 6 am.

- The 24/7 full-time enforcement officer cohort is understaffed, and yet is consistently drawn away from their duties to backfill for the natural churn rate in the division as well as positions that have been temporarily vacated for special projects.
 - This leads to officers being placed in new positions without adequate onboarding, perpetuating a cycle where experienced and capable officers are consistently at the bottom of a learning curve, thereby creating an experience gap in the division.
- Staffing deficiencies have previously been addressed via fixed-term contract positions and ‘gapping’ funded positions authorized by Council. Given the fixed timeline of these positions, they are helpful in the short-term but exasperate the cycle that draws from experienced Enforcement Officers in Property Standards and Licencing. Consequently, this draws experienced Enforcement Officers from the 24/7 cohort, which then draws experienced officers from our part-time cohort. This results in a continual shortage of part-time officers, who address the highest profile Service Request categories and those which subsequently feed into out-of-stream escalation requests and complaints.
- The above issues feed into the inability to meet Service Requests in a timely manner. This results in an inordinate number of callbacks and ‘escalation requests’ that come from outside of the established communications stream (311Brampton).
 - The escalation requests are fed directly into the Director and Manager positions through various channels and effectively convert these positions into ad hoc researcher and dispatcher roles diverting them from their core duties of strategic planning, leading, mentoring and enhancing the overall work environment.
 - Callbacks increased to 5,537 in 2023 which represents a 380% increase since 2021.

Based on the above observations, and specifically noted recommendations when applicable, the following staffing changes are being recommended (see Attachment #2 “Stabilization Staffing Model”):

- **Creation of a supervisor level position – Training Supervisor;**
 - *Recommendation # 18. Provide/Enhance Training;*
 - This will ensure delivery of basic, mandatory and enhanced training across the entire department.
 - Allows for continual improvement and will assist in incorporating recommendations from the three Enforcement & Service Delivery Committees as well as the 311 Working Group
- **Creation of a supervisor level position – Escalations & Communications Supervisor;**
 - *Recommendation # 10. Evaluate Escalation Process;*

- Escalations to be directed to a single point of contact which will allow for a more consistent and client-focused experience.
- This also allows the Director and Managers to focus on the core duties of strategic planning, department analysis, vision development/implementation, coaching and mentoring.
- This supervisor will join the 311 Working Group to attain efficiencies in processes to reduce the number of callbacks and escalations.
- **Creation of a Zoning Plans Examiner**
 - *Recommendation #21. Establish Building and Zoning Investigation Unit.*
 - The key driver of this recommendation was the time-lag between the zoning request and the zoning response,
 - This position will address division-specific requests which will significantly reduce request turnaround time,
 - This dedicated position will be funded by Bylaw and Enforcement Services and report through the Building Services reporting structure.
- **Absorb current Council authorized four Enforcement Officers (Illegal Land Use Task Force) into complement,**
 - The current staffing model of utilizing gapping funds, while appreciated and effective in the short-term, is not sustainable,
 - This will assist in stabilizing the Property Standards Officer staffing levels. The anticipation is that, once the task force has met its goals, these officers will return to the larger Property Standards Officer complement.
 - A subsequent staffing request will need to be assessed should the Residential Rental Licence Pilot become permanent and expanded prior to the above officers returning to their regular duties,
 - Development opportunities will also be offered to the 24/7 cohort once staffing levels are stabilized on an extended temporary basis,
- **Absorb current Council authorized analyst position for Residential Rental Licence Pilot;**
 - The significant value of an analyst position was identified when structuring the RRL pilot,
 - This position provides tangible benefit to a minimum of ten recommendations (noted on Attachment #1)
 - This position is needed in an ongoing capacity. It will assist in capturing department-wide metrics which will then feed into reporting metrics that will drive both efficiencies and workload assessments.

- **Increase P/T Enforcement Officer complement and assign them directly to 24/7 cohort platoons;**
 - *Recommendation #8. Investigate Outsourcing Parking Enforcement;*
 - The P/T Enforcement Officer work environment will see immediate improvement via a stable and present supervisor that can provide constant and consistent guidance, mentoring and support. (the current model has their supervisor working a different shift),
 - Allows for a two-shift staffing model that will enhance 24/7 enforcement efforts as well as work/life balance,
 - Increased cohort size will better serve the natural churn rate of the department,
 - The two-shift staffing model allows for full utilization of both Automatic Licence Plate Reader (ALPR) vehicles,
 - Position is essentially a cost recovery plus potential additional revenue recognized;
 - Approximately \$87K in fines issued per P/T Enforcement Officer for every \$44K in salary

- **Increase to existing staff model positions include:**
 - **Increase F/T Enforcement Officer 24/7 complement by 3 Enforcement Officers per platoon**
 - **Increase F/T Enforcement Officer Licence complement by 1 Enforcement Officer**
 - **Increase F/T Enforcement Officer Property Standards complement by 5 Enforcement Officers**

- These staffing increases will allow for immediate assistance in addressing 'day-of' workload while also ensuring that short-term absences can be absorbed by the affected area without immediately necessitating a trickledown backfill effect.
- These increases will also provide the flexibility within the staffing levels to participate in ongoing implementation efforts of the identified recommendations.
- Current priorities of the Additional Residential Unit Task Force and the Residential Rental Licence Pilot will be immediately addressed by the additional staffing and further supplemented by temporarily seconded Enforcement Officers from the 24/7 complement when available. The absence of the seconded officers from their permanent posting is a development opportunity and will not necessarily create a need to backfill from the P/T cohort
- A transition to a more proactive enforcement strategy will, if cohort size is unaddressed, detract from the Service Request response level. Increased cohort size will better facilitate this process as it is researched and developed.

- Measures have been implemented to directly address work environment, process improvements, and enhance culture. Staff-led committees are purposefully structured to include Enforcement Officers to be both better informed through proactive information sharing, and to demonstrate the appreciated value of all staff. Inevitably, of course, these essential initiatives draw Enforcement Officers away from their core duties of Service Requests response, however, a right-sized cohort will ensure Service Request response is maintained and increased.

Net Change:

- P/T Enforcement Officer = +14
- F/T Enforcement Officer = +24 (incl. 2 Supervisor positions)
- Analyst = +1
- Zoning Plans Examiner = +1

The increase of complement will have ancillary equipment needs that can be accommodated in the routine hiring process. However, an environmental scan identified that the increase in complement will also require an immediate increase in our assigned fleet as the current fleet is not sufficient to deploy the added complement. It is requested that the fleet be increased by 12 vehicles that contain suitable cargo capacity to support the removal of nuisance signs, which is a core duty of the part-time cohort while they perform the parking enforcement duties.

METHODOLOGY:

In reviewing the metrics provided by the Enforcement Review it is apparent that the current dataset is designed to provide a macro picture as opposed to workload assessment per officer. This inherently limits the ability to forecast the immediate impact of the increased staffing levels. Further exasperating this is the recognition that this increased staffing level will require 8-12 months to complete. Factors in this timeframe include the hiring recruitment process and obtaining the necessary vehicle infrastructure.

With this in mind the staffing levels required to provide a stabilization influence were drawn from the following observations:

- The newly created positions are tied directly to Review recommendations as noted in their descriptions.
- Base workload increases are tied to the increased call volume noted as a 3-year average. This average has increased 51% over this time period:
 - 1 FTE increase to Licensing = 8% staffing increase
 - 5 FTE increase to Property Standards = 31% staffing increase
 - 3 FTE/Platoon increase to 24/7 Bylaw cohort = 22% staffing increase

While the staffing increases fall far below the increased service requests levels this stabilization model will provide flexibility to resource the committees focused on developing the SOPs and metrics that will then allow for a more analytical assessment of staffing requirements. Additionally, the assessment is that this level will have a sufficient impact on the following recommendations. :

Recommendation # 11. Affirm Priority Designations

Recommendation # 13. Begin To Implement Small Scale Proactive EO Enforcement Process

Recommendation # 17. Process Improve

Recommendation # 18. Provide/Enhance Training

Recommendation # 19. Review Municipal Shift Schedules

Recommendation # 20. Evaluate Benefits Of Tiered Staffing Model

Recommendation # 22. Focus On Staff Morale

Recommendation # 23. Develop An Enforcement Long-Term Strategy

Recommendation # 24. Evaluate Attendance Management Program

Recommendation # 25. Address Unavailability of EOs

Recommendation # 26. Implement Revised/New SOPS

Recommendation # 27. Determine Staffing Requirement

Recommendation # 28. Ensure Accountability

It is recognized that the part-time enforcement officer job description is primarily focused on parking infractions and nuisance sign removal. This cohort is, in large part, a self-funding cohort and this, coupled with the recognition that more than 37,000 parking related service requests were closed without action, leads to a reasonable conclusion that the increase of 14 part-time officers will not exhaust the increased revenue potential contained in the 37,000 unanswered calls. This increase translates to 6 PTE being on duty at any point within a 24/7 timeframe tasked with covering the entirety of the City of Brampton.

The proposed disbursement of full-time officers is flexible in that they can be moved to differing jobs as increased priorities are identified.

CORPORATE IMPLICATIONS:

Financial Implications:

The recommendations in this report will result in both operating and capital impacts as outlined below.

Operating Budget:

This initiative will require twenty-six (26) full-time, permanent and fourteen (14) part-time permanent complement at a cost of approximately \$3,672,991 annually, to be partially offset by an estimated \$2,033,888 in revenues, for a net annual operating cost of \$1,735,103 as indicated in the following table. All revenue collected will be captured under the Legislative Services Department.

| Total Number of Positions Required | Position Titles | Total Cost |
|---|--|---------------------|
| 1 | Training Supervisor | 139,644 |
| 1 | Escalation & Communications Supervisor | 139,644 |
| 17 | Enforcement Officer | 1,859,872 |
| 1 | Analyst | 119,709 |
| 5 | Property Standards Officer | 572,786 |
| 1 | Plans Examiner - Zoning | 119,709 |
| 14 | Part-time Enforcement Officer | 565,826 |
| Total Salaries Including Benefits + WSIB | | \$ 3,517,191 |
| Add: Ancillary Costs for Staff* | | 155,800 |
| Add: Vehicle Maintenance | | 96,000 |
| TOTAL OPERATING | | \$ 3,768,991 |
| Estimated Revenue | | \$ 2,033,888 |
| Net Operating Cost | | \$ 1,735,103 |
| *Ancillary costs include expenses for uniforms, mobile communication, office expenses, and training | | |

In addition, all expenditures and revenues will be incorporated into the 2025 operating budget submission and presented to the Mayor for his consideration. This initiative will result in an estimated tax impact of 0.12% in 2025.

In 2024, the impact of operating costs will be partial, with onboarding of new staff expected to begin in August and to be staggered throughout the remainder of the year. Staff are committed to monitoring the increase in net operating costs and will provide periodic operating forecasts.

Capital Budget:

The following capital budget amendments are also required, with funding to be transferred from Reserve #4 – Asset Replacement:

- \$744,000 for twelve (12) compact pickup trucks
- \$70,000 for technology for new staff, including laptops, laptop accessories and phones

| Total Required | Description | Total Cost |
|----------------|--|------------|
| 12 | Vehicle - Compact Size Pickup Truck | \$ 744,000 |
| 22 | Laptop, Laptop bag, USB-C Dock, Keyboard & Mouse | \$ 46,000 |

| | | | |
|----------------------|----------------|-----------|----------------|
| 40 | Phone Hardware | \$ | 24,000 |
| TOTAL CAPITAL | | \$ | 814,000 |

The 2024 Budget included approval of a 3-year capital program and funding plan, which maximized the allocation of anticipated funding availability across planned projects. This initiative was not part of the 3-year capital forecast. The approval of this budget amendment will require reprioritization of capital projects forecasted to be funded against Reserve #4 Asset R&R through the 2025 capital budget submission.

STRATEGIC FOCUS AREA:

- **Government & Leadership:** Focusing on service excellence with equity, innovation, efficiency, effectiveness, accountability, and transparency. Implementation of the included recommendations will elevate performance and service standards as well as advancing technology for service delivery.

CONCLUSION:

- The analysis and implementation of the recommendations in the Enforcement Operational Review is underway. The implementation of the “Stabilization Staffing Model” will ensure that these efforts are sustainable and will immediately impact four of the six key elements identified by the “Enforcement Review Final Report”:
 - *Staff morale is an issue that must be addressed. Creating a more supportive environment is a first step to improving the division’s culture;*
 - *An increase in staffing (FTEs) is immediately required to stabilize the organization and to bring relief to the current high pressure/demand. An increase in FTEs is also required in order to implement some of the recommendations in this report;*
 - *Attention to improved internal operating practices and improved supporting technology must be addressed;*
 - *Improved communication, both internal and external, is essential for success.*

The immediate increase to the Enforcement and Bylaw Services Fleet allotment will ensure the newly added resources are efficiently deployed into the community.

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Attachments:

- Attachment 1 Recommendations Status Update June 5, 2024
- Attachment 2 Stabilization Staffing Model