

**City of Brampton Internal Audit – By-law Enforcement**  
**Private & Confidential**

<b>Audit Name</b>	By-law Enforcement		
<b>Sponsor(s)</b>	Marlon Kallideen, Chief Administrative Officer Laura Johnston, Commissioner, Legislative Services Robert Higgs, Director, Enforcement & By-Law Services Peter Bryson, Manager, Property Standards		
<b>Business Unit(s)</b>	By-law Enforcement (Property Standards)	<b>Date Issued:</b>	May 30, 2024

**1.0 Executive Summary**

**Audit rating:** Processes around Property Standards activities were rated as "Significant Improvement Required" (See **Appendix 3** for the criteria for audit report rating).

Internal Audit staff discussed the following areas of improvement with Management:

- Service requests added onto existing requests are not being actioned, which results in property standards violations not being addressed and an increase in the volume of follow-up calls from residents, as discussed in finding number 1.
- A consistent process for reviewing open service requests has not been implemented to ensure that all open requests have been properly addressed and their open status is correct. This overstates the volume of future work, as discussed in finding number 2.
- Officers on extended leave are not always removed from receiving service requests, contributing to the backlog of service requests and significantly delaying the actioning of these requests, as discussed in finding number 3.
- No process is in place to track service request response time, which results in missed opportunities /tools for management to evaluate performance or identify potential operational improvements, as discussed in finding number 4.
- Charges for the clean-up of exterior properties are not always charged back to the property owner, which results in the City paying for the clean-up of private properties, as discussed in finding number 5.
- Cancelled service requests sometimes contain incomplete information in Amanda, the City's By-law Enforcement service request tracking software, rendering it difficult to determine the rationale for cancellation and whether the cancellation was valid, as discussed in finding number 6.
- Service requests for exterior offences are not always assigned the correct offence category, which results in permanent officers responding to service requests that could be completed by summer students, as discussed in finding number 7.

**Conclusion:**

Overall, property standards has an adequate framework to receive, investigate and enforce property standards violations. Service requests are automatically integrated into Amanda and assigned to officers, while steps taken to conduct investigations, enforcement, and subsequent investigations adhere to standard operating procedures, and evidence is uploaded to Amanda.

The audit noted that officers' enforcement approach aligns with the department's objective of compliance through education, and officer duties are performed with professionalism and courtesy.

However, there are opportunities for Bylaw Enforcement to improve the efficiency and effectiveness of property standards enforcement by enhancing processes around managing and responding to service requests.

Additionally, staff should improve the process for reconciling paid contractor invoices to ensure that the City fully recovers clean-up charges from offending property owners and should also work with Service Brampton to ensure service requests for "Grass" and "Refuse" are properly categorized.

Acting on the recommendations below will strengthen property standards enforcement processes and improve service delivery to residents.

## 2.0 Background, Objectives, and Scope

The City of Brampton's Enforcement and By-law Services enforces by-laws enacted by the City Council to uphold community standards and public safety. The service responds to complaints and violations within the community by executing municipal by-laws and provincial statutes, completing investigations and applying corrective measures, and offering education to encourage by-law compliance. Enforcement and By-law Services operate under Legislative Services.

The City's Enforcement and By-law Services consist of three sections:

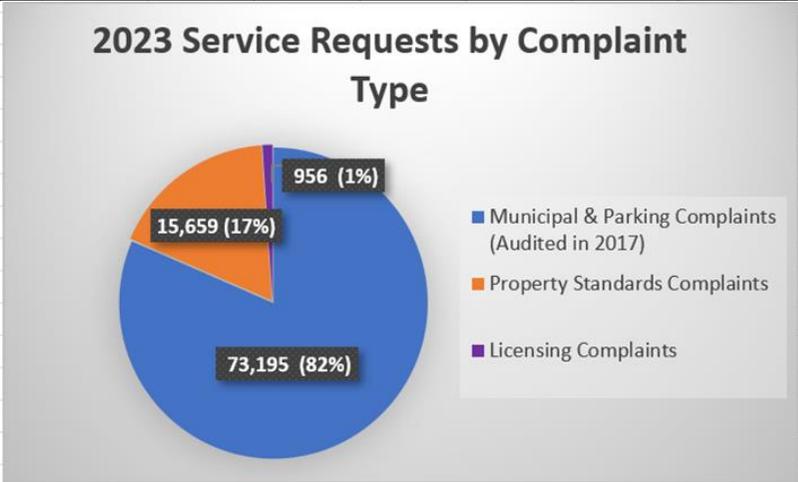
- Municipal and Parking Enforcement
- Licensing Enforcement
- Property Standards Enforcement

The Property Standards section is the focus of this audit.

The Property Standards section enforces minimum maintenance standards and zoning compliance relating to private property, including City by-laws. Property Standards Officers respond to over 20 service request types and conduct investigations under several Municipal by-laws, including but not limited to Minimum Maintenance By-law 165-2022 (Property Standards), Second Unit Registration By-law 157-2022, Vital Services By-law 68-2018, Grass and Weeds By-law 166-2011, Refuse and Dumping By-law 318-2005 and Zoning By-law 270-2004.

Exterior property standards require that minimum maintenance standards be met on the outside property, including removing all refuse and debris, cutting long grass, proper storage of garbage receptacles and maintaining all components of the property. Interior property standards require that minimum standards are met inside a dwelling to maintain a safe and sanitary living space. All occupants in a home must be provided adequate ventilation, exits, lighting, water, plumbing, heat and electricity.

Officers enforce all complaints of illegal basement apartments and lodging houses, which may include executing search warrants pursuant to the Planning Act and Zoning By-laws. Inspections identify deficiencies the homeowner or occupants must repair to meet by-law compliance, including obtaining necessary registration and permits or providing vital services such as heat, hydro and potable water.



There are currently 28 employees in the Property Standards unit, including 24 Property Standards enforcement officers, 3 Supervisors and 1 Manager, Enforcement & Property Standards. The City is divided into 4 geographical quadrants, and officers are assigned to a specific service area.

Property Standards Officers work 8:30 AM to 4:30 PM Monday through Friday. Every week, on Wednesday or Thursday, officers work extended hours from 8:30 AM to 8:00 PM to facilitate evening inspections for residents who may be unavailable during the day.

Property standard complaints are received through service requests in the customer relations management (CRM) software before being integrated into Amanda, the City’s By-law Enforcement service request tracking software. Service requests can be made by telephone (311), e-mail, City of Brampton Smart Mobile 311 APP, the City’s website (311 portal), or in person. Service requests are assigned to specific officers based on the physical address of the complaint. Officers can view their service requests in the “Task List” section of Amanda.

Property Standards Complaints					
Intake Method	2021	2022	2023	Total	%
Phone	11,725	14,017	9,230	34,972	48%
Email	5,183	5,544	2,119	12,846	22%
Enforcement/Dispatch	2,737	3,514	2,939	9,190	11%
Online Services	2,610	2,924	2,984	8,518	11%
311 Mobile App	1,678	2,807	2,802	7,287	7%
In-Person	22	43	45	110	0.1%
Mail	-	4	-	4	0%
<b>TOTAL</b>	<b>23,955</b>	<b>28,853</b>	<b>20,119</b>	<b>72,927</b>	<b>100%</b>

When completing an investigation, depending on the facts and circumstances of a violation, the officer may take any one or combination of the following actions:

- 1) Issue a penalty notice for a prescribed monetary amount or no amount (i.e. \$0 Warning)
- 2) Issue a Property Standards Deficiency Report
- 3) Issue and serve a Property Standards Order made under subsection 15.2 of the Building Code Act, providing a compliance period of no shorter than 21 days.

Information about investigations, including officer notes, photos and videos, is saved in Amanda and/or gtechna, the City's penalty notices issuance software. Any penalty amounts not paid within 15 days following service will be subject to additional processing fees. Penalty notices that go into default will be forwarded for collection or added to the property tax roll and collected in the same manner as property taxes per the Municipal Act, 2001.



In cases where a homeowner or occupant does not complete the action(s) listed in the property standards order, an outside contractor may be hired to perform the required maintenance. Currently, a purchase order is in place with a contractor who performs maintenance functions such as grass cutting, weed removal, and removal of refuse and debris. All contractor invoices for remedial work at a non-compliant property are approved by the Property Standards Enforcement Supervisor before being forwarded to Tax Services and added to the respective property tax roll.

While completing an inspection, if an officer observes a public safety concern that falls under the jurisdiction of another City department or outside agency, they will refer the file to the appropriate authority. Building Services, Public Works & Engineering, and Fire Prevention are the most common departments that receive referrals.

In 2019, the “Second Unit Task Force” was created to investigate complex cases related to illegal second units, multi-units, and lodging houses. In 2022, the Second Unit Task Force expanded its service model to investigate all complaints related to additional living spaces. Most cases are associated with property owners who have constructed additional dwelling spaces not registered with the City. There are currently six full-time Second Unit Task Force officers and one Supervisor.

The By-law Enforcement audit is part of the approved 2024 audit plan. The last full-scope By-law enforcement audit, which focused on parking, was completed in 2017.

## **Objectives**

This audit reviewed processes and controls around Property Standard enforcement to ensure they are effective, efficient, and compliant with City by-laws, policies, and procedures. Specifically, the objectives of this engagement were to assess whether:

- Property standards enforcement activities comply with City by-laws, Policies and Standard Operating Procedures (SOP)
- Service request (#311) information provided to officers is complete, and calls are investigated promptly
- On-site inspection process adheres to Standard Operating Procedures and is consistent across the department
- All investigative evidence, including officer notes, photographs, and videos, is uploaded to Amanda
- Second Unit Task Force activities are appropriately coordinated and aligned with the objectives of the division
- Service request referrals are warranted and forwarded to the appropriate department or agency with complete
- Service requests (Open and Closed) are reviewed by the Supervisor and closed off in Amanda promptly
- Fines or penalties issued are appropriate based on the offence, and the amount agrees to the User Fee By-law
- Contractor invoices for clean-up and maintenance are properly approved and charged back to the property owner
- Court proceedings of property standards offences are properly coordinated, effective, and completed timely

## **Scope**

Our audit scope covered property standards enforcement activity from January 1, 2021 to December 31, 2023.

The following areas were not included in the scope of this audit:

- Municipal enforcement and Parking (Audited in 2017)
- Licensing Enforcement (May cover this area in a future audit)
- Maintenance and repair of enforcement vehicles (Covered in Fleet Maintenance Audit – 2023)
- Laws or regulations governed by outside agencies (Peel Regional Police, Ministry of Transportation, etc.)
- Information technology general controls ("ITGCs") for any systems

### 3.0 Detailed Audit Findings, Recommendations, and Proposed Management Actions

#	Findings	Rating	Recommendations	Management Action Plan, Responsible Person(s) and Due Date
1	<p><b>Service requests added onto existing requests are not being actioned</b></p> <p>Service requests can be made via phone, e-mail, the City’s website, the 311 mobile app, or in person. They are captured in the CRM system before being automatically integrated into Amanda. If there is an existing service request in Amanda for the same violation and property (e.g., two complaints, both for excessive grass at 123 Main St.), a new request is not created; rather, the information provided by the second complainant is added as “Additional Information” in the notes of the existing file.</p> <p>Based on the business rules set up between property standards and IT, additional service requests are added to the original request to keep the history of information about a specific property in one file. In the audit period there were 72,927 property standards complaints integrated into Amanda, resulting in 52,423 unique complaints. 47,088 of the complaints resulted in new service request files being created and the remaining 5,335 (10%) complaints were added to existing requests (i.e. Add-on requests).</p> <p>New service requests appear in an officer’s “Task List” in Amanda, however, for add-on requests, the officer and Supervisor only get an e-mail notifying them that additional information has been added to a service request.</p> <p>A data reconciliation between CRM and Amanda found that all complaints entered in CRM were successfully integrated into Amanda. However, we randomly sampled 50 add-on requests from the audit period and found that none have been actioned by officers. These service requests span all categories, such as basement apartments, lodging houses, refuse, excessive grass, sheds/structures, etc. Some</p>	P1	<p>City Council request that the Director, Enforcement &amp; By-Law Services work with IT to ensure add-on service requests are clearly identified and actioned timely.</p>	<ol style="list-style-type: none"> <li>1. Manager, Property Standards to work with IT (Amanda Support) to generate a report of all open files where “Additional Information” has been added to an open service request by end of Q4 2024. Those files requiring further investigation will be actioned and those which are complete will be closed as required to facilitate proper CRM /Amanda integration and the creation of new files. <i>*Subject to availability of IT resources.</i></li> <li>2. Manager, Property Standards to develop or amend SOP by end of Q2 2024 to ensure Officer tasks lists are reviewed at regular intervals and actioned/closed as required.</li> <li>3. Manager, Property Standards to review task lists of past staff to ensure files were reassigned or closed as required by end Q3 2024.</li> <li>4. Manager, Property Standards to immediately explore with IT (Amanda Support) alternative solutions to email notifications for</li> </ol>

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	<p>service requests from 2023 were added onto requests from as far back as 2009.</p> <p>Table 1 below shows a breakdown of the service requests received between 2021 and 2023 that were added onto an existing request and the year the existing request was created.</p> <table border="1" data-bbox="152 443 1034 1114"> <thead> <tr> <th colspan="6">Table #1</th> </tr> <tr> <th colspan="6">Complaints from 2021 to 2023 added to existing service requests (i.e. add-ons) created in the following years</th> </tr> <tr> <th>Description</th> <th>2021-2023</th> <th>2018-2020</th> <th>2015-2017</th> <th>Pre-2015</th> <th>Total</th> </tr> </thead> <tbody> <tr> <td>Refuse</td> <td>762</td> <td>32</td> <td>1</td> <td>4</td> <td>799</td> </tr> <tr> <td>Excessive Grass/Weeds</td> <td>1404</td> <td>11</td> <td>5</td> <td>11</td> <td>1431</td> </tr> <tr> <td>P.S. Exterior Offences</td> <td>533</td> <td>119</td> <td>9</td> <td>10</td> <td>671</td> </tr> <tr> <td>Basement Apartments</td> <td>439</td> <td>233</td> <td>19</td> <td>34</td> <td>725</td> </tr> <tr> <td>Garbage Containers</td> <td>307</td> <td>8</td> <td>0</td> <td>0</td> <td>315</td> </tr> <tr> <td>Driveway Widening</td> <td>304</td> <td>149</td> <td>0</td> <td>1</td> <td>454</td> </tr> <tr> <td>Lodging house</td> <td>347</td> <td>237</td> <td>2</td> <td>2</td> <td>588</td> </tr> <tr> <td>P.S. Interior Offences</td> <td>44</td> <td>17</td> <td>1</td> <td>1</td> <td>63</td> </tr> <tr> <td>Vital Services</td> <td>22</td> <td>4</td> <td>0</td> <td>0</td> <td>26</td> </tr> <tr> <td>Illegal Operations</td> <td>73</td> <td>21</td> <td>16</td> <td>9</td> <td>119</td> </tr> <tr> <td>Other</td> <td>106</td> <td>32</td> <td>6</td> <td>0</td> <td>144</td> </tr> <tr> <td><b>Total</b></td> <td><b>4341</b></td> <td><b>863</b></td> <td><b>59</b></td> <td><b>72</b></td> <td><b>5335</b></td> </tr> </tbody> </table> <p>Although it cannot be determined how many of these add-on requests were missed, in general, the older the existing request, the less likely it is that the service request was noticed, especially if the existing request is closed.</p> <p>As per staff, these add-on requests are much less visible. A new service request goes directly into the officer's task list, whereas add-on requests are only accompanied by an email. Unless the officer</p>	Table #1						Complaints from 2021 to 2023 added to existing service requests (i.e. add-ons) created in the following years						Description	2021-2023	2018-2020	2015-2017	Pre-2015	Total	Refuse	762	32	1	4	799	Excessive Grass/Weeds	1404	11	5	11	1431	P.S. Exterior Offences	533	119	9	10	671	Basement Apartments	439	233	19	34	725	Garbage Containers	307	8	0	0	315	Driveway Widening	304	149	0	1	454	Lodging house	347	237	2	2	588	P.S. Interior Offences	44	17	1	1	63	Vital Services	22	4	0	0	26	Illegal Operations	73	21	16	9	119	Other	106	32	6	0	144	<b>Total</b>	<b>4341</b>	<b>863</b>	<b>59</b>	<b>72</b>	<b>5335</b>			<p>open files which have "Additional Information" added.</p>
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	<p>reviews every email, these add-ons will be missed. This discussion is consistent with our findings.</p> <p>Property standards should work with IT to create a daily report showing add-on requests. The report should reference the original service request information, and staff should review the report daily to ensure they are aware of incoming add-on service requests and can take action accordingly.</p> <p><b>Potential Impact:</b> Not having an effective process in place to manage add-on service requests results in officers missing these complaints. Missing add-on service requests results in an increase in the number of property standards violations not actioned upon, and the volume of follow-up calls from residents.</p>			
2	<p><b>A consistent process for reviewing open service requests is not in place</b></p> <p>Service requests are automatically assigned to the next available officer in the respective zone of the complaint address. New requests are added to the respective officers' "Task List" in Amanda. Officers can set up their task list to show their service requests for a specific period (Current week, month, year, etc.).</p> <p>A review of the process for monitoring open service requests noted the following:</p> <p>A. <u>Inconsistent process for reviewing open service requests</u></p> <p>As per discussion with staff, there is no defined approach for the review of dated open service requests. The timing and extent of service request reviews depend on individual officer preferences, and in many cases, older open requests are not reviewed regularly to ensure they have been actioned and the open status is correct.</p>	P2	City Council request that the Director, Enforcement & By-Law Services develop a consistent approach in reviewing dated open service requests.	<ol style="list-style-type: none"> <li>1. Manager, Property Standards to develop or amend SOP by end Q2 2024 to ensure Officer tasks lists are reviewed at regular intervals and actioned/closed as required. (Reference A.)</li> <li>2. Manager, Property Standards to explore with IT (Amanda Support) changes to the default task list display allowing officers enhanced search capability for open files. Manager to engage IT in Q3 2024 to discuss options. (Reference A.)</li> <li>3. Manager, Property Standards to commence a review of "open" file requests starting with "Pre-2015"</li> </ol>

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This will allow for expedited closure of files no longer requiring enforcement action. (Reference B.)  *Subject to availability of IT resources.</p> <p>5. Manager, Property Standards to undertake a review of all “open” driveway files which were unactioned due to a “hold” during covid and develop a plan for how these should be actioned or closed. A proposal for action will be presented to the Director of Enforcement and Bylaw Services in Q2 2024 for consideration. (Reference C.)</p>												
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	<p>A consistent approach to reviewing open service requests should be put in place and any requests that do not require future action should be closed. This will clearly show how many requests still need to be actioned.</p> <p>B. <u>Basement apartment service requests are not periodically reconciled to building permit information</u></p> <p>For basement apartments, Officers educate the property owner on registration and zoning requirements and provide information on the necessary steps to become compliant, including how to start the building permit and registration process. The Building Department oversees all aspects of construction including reviewing applications and blueprints, issuing the building permit, performing inspections and issuing registration certificates.</p> <p>Once the building department issues a building permit, Property Standards is no longer involved with the process and updates the status of the request from “Re-Inspection Required” to “Closed-Pending Two Unit Registration.”</p> <p>Open service requests (e.g., “Re-inspection Required”) were reconciled to their respective building permits. Out of 544 open service requests, 52 (9.6%) have had a building permit issued and thus should be closed; however, these 52 remain open.</p> <p>As part of the periodic review of open service requests for basement apartments, staff should reconcile open service requests with building permit data to identify what properties have been granted permits and can be closed.</p>			<p>It is worth noting that a recent change in zoning provisions has altered some of the allowances since the receipt of these complaints and further still Council is exploring ward specific driveway requirements which may impact a significant number of these files.</p> <p>A manner for how best to deal with these files may be dependent on the will of Council based on a Zoning review and Ward boundary review currently underway.</p> <p>6. Manager, Property Standards to engage IT (Amanda Support) to develop an automated process for implementation in September 2024 where any “open” and unactioned file assigned to a summer student is re-assigned to the area full-time Officer. (Reference D.)  <i>*Subject to availability of IT resources.</i></p>

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	<p>C. <u>Covid era service requests for illegal driveways are still open</u></p> <p>During Covid, based on emerging challenges and the re-prioritization of By-law enforcement activities, City Council made the decision to suspend the enforcement of illegal driveways temporarily. Property Standards are dealing with and responding to new driveway width complaints under the current zoning provisions. However, staff are holding off on addressing the backlog of complaints due to the following:</p> <p>According to staff, a recent change to the Zoning provisions in February of 2024 has altered some of the width allowances since the receipt of these complaints and, Council is exploring ward specific driveway requirements which may impact a significant number of these open files.</p> <p>Staff advised they are waiting for the completion of the ward specific zoning review and ward boundary review which are currently underway before they determine how best to deal with these files.</p> <p>D. <u>Inconsistent process for reviewing open service requests assigned to summer students</u></p> <p>Staff use summer students to enforce requests related to excessive grass and refuse during the high-volume call months of May to September.</p> <p>Table 4 below shows a breakdown of open service requests initially assigned to summer students from 2021 to 2023.</p>			

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	<p style="text-align: center;"><b>Table #4</b></p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th rowspan="3" style="width: 15%;">Description</th> <th colspan="8">Service Req. status as of April 15, 2024 - Summer Students</th> </tr> <tr> <th colspan="2">2023</th> <th colspan="2">2022</th> <th colspan="2">2021</th> <th colspan="2">Total</th> </tr> <tr> <th>Open</th> <th>%</th> <th>Open</th> <th>%</th> <th>Open</th> <th>%</th> <th>Open</th> <th>%</th> </tr> </thead> <tbody> <tr> <td>Excessive Grass/Weeds</td> <td>2</td> <td>0.1%</td> <td>19</td> <td>1%</td> <td>4</td> <td>0.2%</td> <td>25</td> <td>0.3%</td> </tr> <tr> <td>Refuse</td> <td>109</td> <td>10%</td> <td>16</td> <td>2%</td> <td>3</td> <td>1%</td> <td>128</td> <td>5.2%</td> </tr> <tr> <td>Standing Water</td> <td>0</td> <td>0</td> <td>1</td> <td>2%</td> <td>0</td> <td>0</td> <td>1</td> <td>0.9%</td> </tr> <tr> <td><b>TOTAL</b></td> <td><b>111</b></td> <td><b>3%</b></td> <td><b>36</b></td> <td><b>1%</b></td> <td><b>7</b></td> <td><b>0.3%</b></td> <td><b>154</b></td> <td><b>1.5%</b></td> </tr> <tr> <td colspan="9"><b>% - Open service requests as a percentage of total service requests for the year</b></td> </tr> </tbody> </table> <p>Open requests should be reviewed every September, and any requests not closed by students before their departure should be actioned and/or closed by permanent staff.</p> <p><b>Potential Impact:</b></p> <ul style="list-style-type: none"> <li>A. An inconsistent process to review dated open service requests can result in missed service requests not being detected</li> <li>B. Not reconciling open basement apartment service requests with building permit data does not ensure requests are closed timely</li> <li>C. Dated driveway requests remaining open overstates the volume of future work</li> <li>D. Dated open grass and refuse requests assigned to summer students does not ensure all requests have been addressed.</li> </ul> <p>Leaving dated and unactionable service requests open can overstate the volume of future work and increase the difficulty of planning enforcement activities.</p>	Description	Service Req. status as of April 15, 2024 - Summer Students								2023		2022		2021		Total		Open	%	Open	%	Open	%	Open	%	Excessive Grass/Weeds	2	0.1%	19	1%	4	0.2%	25	0.3%	Refuse	109	10%	16	2%	3	1%	128	5.2%	Standing Water	0	0	1	2%	0	0	1	0.9%	<b>TOTAL</b>	<b>111</b>	<b>3%</b>	<b>36</b>	<b>1%</b>	<b>7</b>	<b>0.3%</b>	<b>154</b>	<b>1.5%</b>	<b>% - Open service requests as a percentage of total service requests for the year</b>									<b>P2</b>		
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<b>3</b>	<p><b>Officers on extended leave still receive service requests</b></p> <p>All incoming service requests are received in the Customer Relations Management (CRM) system and automatically integrated into Amanda, the City's By-law Enforcement service request tracking</p>	<b>P2</b>	City Council request that the Director, Enforcement & By-Law Services ensure that service requests are not	1. Manager, Property Standards to develop or amend SOP by the end of Q2 2024 to ensure Officer assignments are suspended																																																																						

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	<p>system. Once in Amanda, they are categorized by geographical zone and assigned to the next available officer.</p> <p>In cases where an officer is expected to be away for longer than two weeks, Management is supposed to create an IT ticket to remove the officer from the assignment list to prevent service requests from being sent to the officer's task list while they are off work.</p> <p>For purposes of this review, service request start dates were analyzed to identify periods of officer inactivity, which are termed "Leaves."</p> <p>We reviewed 11 leaves for 9 employees that were 5 weeks or more and noted that Amanda continued to assign service requests to officers on leave for 6 leaves, with the average period of absence being 3.5 months. During these leaves, Amanda assigned an average of 48 requests to these officers. The service requests assigned to officers on leave were not actioned until the officer returned to work, resulting in delays in responding to these service requests.</p> <p>When Property Standards Supervisors are informed of an extended leave, they should take the necessary steps to remove the officer from receiving requests. This will divert incoming service requests to active officers so they can be actioned faster.</p> <p>This is especially important based on the high absenteeism rate and extended leaves that Property Standards has experienced in recent years.</p> <p><b>Potential Impact:</b> Continuing to assign service requests to officers on leave results in significant delays in processing these service requests.</p>		assigned to officers on extended leaves of absence.	during extended periods of absence.

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4	<p><b>Staff does not track service request response time against the targeted timeline</b></p> <p>As per standard operating procedures, for incoming service requests, the officer shall make a reasonable attempt to attend the property within 7 business days of receiving the file unless there is an immediate safety concern.</p> <p>All Property Standards staff are aware of the guideline to respond to service requests within 7 days; however, no process is in place to track or monitor response times.</p> <p>Internal Audit staff analyzed Amanda's data and calculated the days between receipt of a service request and the initial officer action for each request. The following was noted:</p> <p>For exterior offences, 61% of service requests are responded to within 7 days, and 91% are responded to within 30 days of receiving the service requests.</p> <p>Table 5 below shows a breakdown of service request response time in relation to the target response time for exterior offences received from 2021 to 2023.</p> <table border="1"> <caption>Table #5</caption> <thead> <tr> <th rowspan="3">Description</th> <th rowspan="3">Target (Days)</th> <th colspan="14">2021 - 2023 Service Request Response Days</th> </tr> <tr> <th colspan="2">0 - 7 Days</th> <th colspan="2">8 - 14 Days</th> <th colspan="2">15-30 Days</th> <th colspan="2">31-60 Days</th> <th colspan="2">61-90 Days</th> <th colspan="2">91+ Days</th> <th colspan="2">Total</th> </tr> <tr> <th>#</th> <th>%</th> </tr> </thead> <tbody> <tr> <td>Refuse</td> <td>7</td> <td>7,234</td> <td>65%</td> <td>1,895</td> <td>17%</td> <td>1,215</td> <td>11%</td> <td>468</td> <td>4%</td> <td>162</td> <td>1%</td> <td>77</td> <td>1%</td> <td>11,051</td> <td>100%</td> </tr> <tr> <td>Excessive Grass/Weeds</td> <td>7</td> <td>4,950</td> <td>49%</td> <td>2,047</td> <td>20%</td> <td>1,829</td> <td>18%</td> <td>785</td> <td>8%</td> <td>368</td> <td>4%</td> <td>188</td> <td>2%</td> <td>10,167</td> <td>100%</td> </tr> <tr> <td>P.S. 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Exterior Offences	7	4,883	68%	1,190	17%	638	9%	300	4%	59	1%	89	1%	7,159	100%	Driveway Widening	7	1,007	52%	243	13%	212	11%	173	9%	59	3%	233	12%	1,927	100%	Garbage Containers	7	2,699	70%	637	16%	315	8%	120	3%	31	1%	63	2%	3,865	100%	Other- Exterior	7	1,621	70%	313	13%	206	9%	98	4%	29	1%	58	2%	2,325	100%	<b>Total</b>		<b>22,394</b>	<b>61%</b>	<b>6,325</b>	<b>17%</b>	<b>4,415</b>	<b>12%</b>	<b>1,944</b>	<b>5%</b>	<b>708</b>	<b>2%</b>	<b>708</b>	<b>2%</b>	<b>36,494</b>	<b>100%</b>	P2	City Council request that the Director, Enforcement & By-Law Services, ensure staff work with IT to track and monitor service request response time against targeted timelines.	<ol style="list-style-type: none"> <li>1. Manager, Property Standards has recently formed an internal "Operations and Service Delivery Committee" where a review of response times is being conducted. One of the mandates of this committee is to develop a service commitment whereby a file will receive its first action. Once determined the new standard will be amended into the current SOP as the new standard and the Enforcement website revised to reflect the new standard.</li> <li>2. Manager, Property Standards to engage IT (Amanda Support) to determine if a report can be developed that will identify all requests for service by Service Type that have been assigned and unactioned since time of receipt that exceed the identified service standard. Estimated time of completion end of Q3. <i>*Subject to availability of IT resources.</i></li> <li>3. Manager, Property Standards to undertake a review of staffing resource allocations to various Property Standards Officer functions once new staff are introduced. The introduction of</li> </ol>
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#	Findings	Rating	Recommendations	Management Action Plan, Responsible Person(s) and Due Date
	<p><b>Potential Impact:</b> Without a process to track response time, Management cannot measure and assess delays, identify root causes of delayed responses, or take corrective action to address operational challenges.</p>			
5	<p><b>The City did not fully recover costs incurred to clean-up private properties</b></p> <p>When a property owner is unwilling or unable to comply with orders to clean up their property exterior, a contractor is used to perform clean-up duties, including cutting grass, pulling weeds, and removing refuse and garbage.</p> <p>Contractor invoices are reviewed by Property Standards Supervisors, uploaded to the respective file in Amanda, and sent to the By-law Enforcement Clerk before being approved for payment. The Clerk manually compiles a list of contractor invoices, including administrative fees, in a spreadsheet. The spreadsheet is sent monthly to the Property Tax department, and the charges are added to the respective property tax roll.</p> <p>A review of the process found that invoices are not always added to the property tax summary spreadsheet. There is also no reconciliation between invoices paid (PeopleSoft) and invoices manually added to the property tax summary spreadsheet.</p> <p>In 2023, 2 out of 156 invoices paid by the City were not charged back to the offending property owner. The total amount of the two invoices is \$1,079.</p> <p>In 2022, 4 out of 139 invoices paid by the City were not charged back to the offending property owner. The total amount of the 4 invoices is \$1,826.</p>	P2	City Council request that the Director, Enforcement & By-Law Services ensure that costs incurred by the City to clean up private properties is fully recovered from the property owner through property tax.	<ol style="list-style-type: none"> <li>1. Manager, Property Standards to develop a reconciliation process in consultation with Tax Department to ensure services are added to tax roll where remedial work was performed because of non-compliance. A review of current practice and amendments to be completed by end of Q3 2024.</li> </ol>

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	<p>Reconciliation could not be completed for 2021 since the invoice description in PeopleSoft does not contain the property address, and the property tax summary spreadsheet does not contain an invoice number.</p> <p>A monthly reconciliation should be established between the accounts payable report (PeopleSoft) and the property tax spreadsheet to ensure that all invoices paid by the City have been added to the property tax spreadsheet and will be recovered through the property tax roll.</p> <p><b>Potential Impact:</b> Not having a reconciliation process to ensure all clean-up invoices paid by the City are added to the property tax bill of the offending property owner results in the City paying for the clean-up of private property.</p>			
6	<p><b>Service requests that have been cancelled do not always contain complete information in Amanda</b></p> <p>The most common reason for cancelling a service request is due to lack of information from the complainant. Requests are also cancelled by the officer or clerk if they were created in error. In the audit period, 660 out of 47,088 service requests, or 1.4%, were cancelled.</p> <p>Not all cancelled service requests have adequate information in Amanda to support the reason for the cancellation. We randomly selected 15 cancelled service requests for review and noted:</p> <p><u>A) Cancelled service request does not always reference the original request</u></p> <ul style="list-style-type: none"> <li>3 cancelled service requests (“Duplicate Call”) did not reference the related service request number</li> </ul>	P2	City Council request that the Director, Enforcement & By-Law Services, ensure that staff provide adequate notes for cancelled service requests and duplicate requests are referred instead of cancelled.	<ol style="list-style-type: none"> <li>1. Manager, Property Standards in consultation with Service Brampton Management through a newly formed committee will standardize a process for cancelling files by the end of Q3 2024. (Reference A.)</li> <li>2. Manager, Property Standards in consultation with Service Brampton Management through a newly formed committee will standardize a process for referring files by the end of Q3 2024. (Reference B.)</li> </ol>

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	<ul style="list-style-type: none"> <li>1 cancelled service request contained no notes indicating the reason for the cancellation and did not reference the related service request number</li> </ul> <p>Property Standards staff were able to determine the related service request number for these five cancelled requests. However, every cancelled request should include the related service request number and reason for cancellation in the inspection notes in Amanda.</p> <p><u>B) Duplicate calls are sometimes cancelled instead of being "Referred"</u>  If multiple service requests are received for the same complaint type and address, they should be "Referred" to the original request and closed. In some cases, including the three duplicate complaints above, requests are being "Cancelled" instead of "Referred".</p> <p>When a service request is cancelled, the complainant will receive the following automated message <i>"We have reviewed the service request and determined no further action can be taken. If you require more information, please call 311 or 905-874-2000, if outside of Brampton."</i></p> <p>In cases where the service request was cancelled because it was a duplicate, this message is misleading since action is being taken on the matter but just under a previously received service request.</p> <p>When a service request is referred, the complainant will receive the following automated message <i>"Your service request has been referred to another agency or authority for further review and/or action. If you require further information, please contact us by calling 311 or 905-874-2000, if outside of Brampton."</i></p> <p>The automated message for referred should be updated to show that the service request has been referred to <i>"another agency, authority or previous service request"</i>.</p>			

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	<p>Service requests should only be cancelled if there is insufficient information from the complainant to proceed with action or if the request was created by Property Standards staff by mistake.</p> <p>Duplicate service requests should be “Referred” instead of “Cancelled” to reflect the ongoing status of the call and ensure the complainant receives the “Referred” notification which informs them their request is still open but has been referred to a previous request or other department.</p> <p><b>Potential Impact:</b>  A) Cancelling a service request without referencing the existing service request it is linked to does not ensure that the cancellation is valid and makes it more difficult for other staff to determine why the request was cancelled.  B) Cancelling service requests instead of referring them does not accurately reflect that the request is in progress and results in the complainant receiving an inaccurate notification.</p>			
7	<p><b>Service requests for exterior offences are not always assigned to the correct offence category</b></p> <p>When a property standards service request is created, the appropriate request category, also called “sub-code” (i.e. Basement Apartment, Refuse, Excessive Grass/Weeds, Driveway, Illegal Structure, etc.) must be selected. If a complaint is entered through the City’s website or 311 mobile app, the category is selected by the complainant. If the complaint is made by phone or e-mail, Service Brampton creates the request and selects the category.</p> <p>There are 35 different categories, including “Refuse,” “Excessive Grass/Weeds,” and “Property Standards Exterior Offences.” The “Property Standards Exterior Offences” category is supposed to be used for external property offences such as roofs, chimneys, porches,</p>	P2	City Council request that the Director, Municipal Transition and Integration, ensure that the appropriate sub-code is assigned to exterior property service requests.	<ol style="list-style-type: none"> <li>1. Manager, Property Standards in consultation with Manager, Service Experience and Quality and Manager, Operations, Service Brampton, will review the internal knowledge base articles to assist 311 staff with call intake processes to assist in the elimination of errors. A review of file options available for residents on both the 311 APP and the web portal will also be reviewed in an effort to ensure the appropriate selections can be made by the public. Estimated</li> </ol>

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	<p>driveways, rodent infestations, extended fence heights, and parking of inoperative vehicles.</p> <p>In the audit period, there were 7,509 service requests for “Property Standards Exterior Offences”.</p> <p>A review of 15 “Property Standards Exterior Offences” found that 5 should have been categorized as “Refuse,” and 2 should have been categorized as “Excessive Grass/Weeds.”</p> <p>Every year, from Spring to Fall, summer students are brought in to assist with the high volume of exterior complaints. However, they are only authorized to action requests for “Excessive Grass/Weeds”, “Refuse” and “Standing Water”. They are not permitted to investigate “Property Standards Exterior Offences” requests since these complaints are often more complex and take longer to resolve, which is why they are reserved for permanent officers.</p> <p>Incorrectly categorizing a “Grass” or “Refuse” request as a “Property Standards Exterior Offence” results in a permanent officer responding to a call that could be actioned by a summer student. It can also result in duplicate efforts if an existing service request for “Grass” or “Refuse” has been created and another file is created for the same issue under “Property Standards Exterior Offences.”</p> <p>Service Brampton should provide staff with refresher training on the differences between categories and the importance of using “Excessive Grass/Weeds” or “Refuse” whenever applicable instead of “Property Standards Exterior Offence” so that all officers, including summer students, can respond to the request.</p> <p><b>Potential Impact:</b> Not assigning the proper category to service requests can create inefficiencies and result in permanent officers spending time on service requests that could be actioned by summer students.</p>			<p>date of completion will be end of Q3 2024. <i>* Subject to availability of IT resources.</i></p> <ol style="list-style-type: none"> <li>2. Manager, Service Experience &amp; Quality and Manager, Operations, Service Brampton, to communicate and provide refresher training to Service Brampton frontline staff for future accuracies. Estimated date of completion is Q2, 2024.</li> <li>3. Manager, Property Standards, Manager, Operations, Service Brampton and Manager, Service Experience &amp; Quality to further streamline process and workflow for enhanced efficiencies, consideration of property standards to retire subtype “Exterior Offences” and implement specific subtypes such as Damaged Roofs, Windows, Extended Fence Heights, Rodent Infestation etc. Estimated date of completion is Q4, 2024. <i>* Subject to availability of IT resources</i></li> <li>4. Manager, Operations, Service Brampton and Manager, Service</li> </ol>

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				<p>Experience &amp; Quality in consultation with Manager, Property Standards to continue adding inaccuracies to the Business Partner feedback log for coach backs, training, and analytics. This process is ongoing.</p>

<b>Report Distribution List</b>	
Marlon Kallideen	Chief Administrative Officer
Laura Johnston	Commissioner, Legislative Services
Robert Higgs	Director, Enforcement & By-Law Services
Peter Bryson	Manager, Property Standards

<b>Internal Audit Team</b>	
Claire Mu	Director, Internal Audit
Brad Cecile	Manager, Internal Audit
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