



# By-law Enforcement Audit (Property Standards)

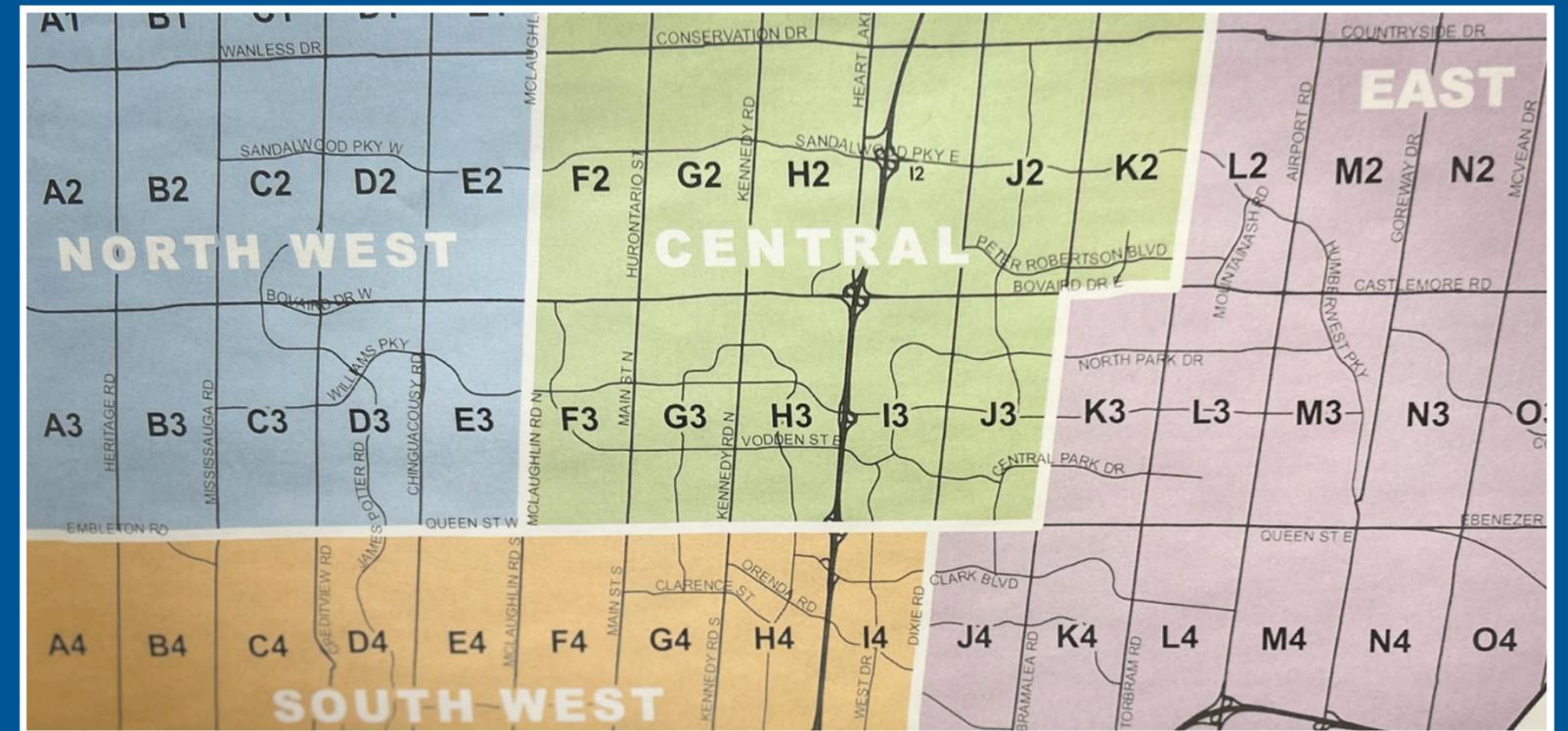
June 10, 2024





# Background

- By-law Enforcement (Property Standards) upholds community standards and public safety by enforcing minimum maintenance standards and zoning compliance relating to private property. They enforce municipal by-laws and provincial statutes, complete investigations, and offer education to encourage by-law compliance.
- The Property Standards unit comprises 28 employees, including 24 enforcement officers, 3 supervisors, and 1 manager.

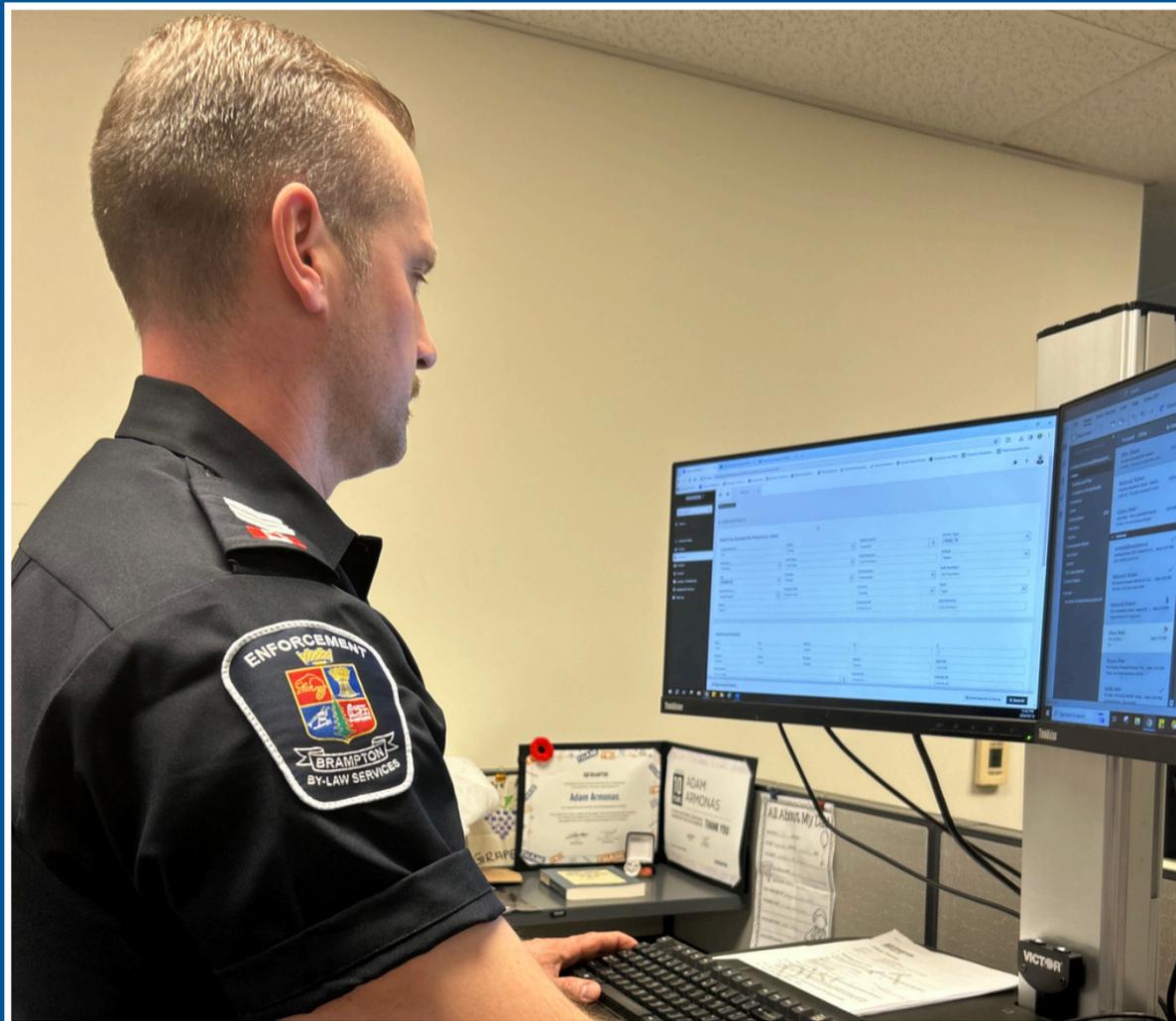


The City is divided into 4 geographical quadrants and officers are assigned to a specific area



# Background

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- The main By-laws enforced by Property Standards are:
  - 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.
- The By-law Enforcement audit was part of the approved 2024 audit plan. The last By-law enforcement audit was completed in 2017 and focused on parking enforcement.



# Our Audit Focused on Property Standards

- Complaints are received into the Customer Relations Management (CRM) software and integrated into Amanda, the City’s By-law Enforcement service tracking software. Requests can be submitted through various channels such as telephone (311), email, the City’s website, Smart Mobile 311 app, or in person.
- Complaints are assigned to officers based on the address of the complaint property. Officers can view their service requests in the “Task List” section of Amanda.

Property Standards Complaints					
Reporting 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>



# Audit Objectives and Scope

January 1, 2021 to December 31, 2023

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## **CITY BY-LAWS AND POLICIES**

- Enforcement activities adhere to City By-laws, policies and standard operating procedures.



## **CALL AND RESPONSE TIME**

- Complaints are captured in Amanda and investigated promptly.



## **INVESTIGATIONS**

- Officers adhere to standard operating procedures when conducting investigations.



# Audit Objectives and Scope

January 1, 2021 to December 31, 2023

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## **SERVICE REQUEST MONITORING**

- Open service requests are reviewed regularly and closed timely in Amanda.



## **COST RECOVERY FOR PROPERTY CLEAN-UP**

- Contractor invoices for property clean-up are approved and charged back to the property owner.



## **FINES AND PROSECUTIONS**

- Correct penalty amounts are issued based on the User Fee By-law and complete information is provided for property standards prosecutions.



# Overall Message

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## **Findings**

Property Standards has an adequate framework to receive, investigate and enforce property standards violations.

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



# Finding #1: Service requests added onto existing requests are not being actioned

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## Condition

If there is an existing service request 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 service request.

This practice is based on the business rules set up between property standards and IT and the purpose is to keep the history of information about a specific property and violation(s) in a single file.

We randomly sampled 50 add-on requests from the audit period and found that none have been actioned by officers. These add-on requests are significantly less visible compared to new service requests. While a new service request is promptly added directly to the officer’s task list, add-on requests are only conveyed via email and not included in the officer’s task list.



# Finding #1: Service requests added onto existing requests are not being actioned (Cont'd)

Complaints from 2021 to 2023 added to existing service requests (i.e. add-ons)					
Description	Year the existing service request was created				Total
	2021- 2023	2018- 2020	2015- 2017	Pre- 2015	
Refuse	762	32	1	4	799
Excessive Grass/Weeds	1404	11	5	11	1431
PS 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
PS 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>

## Impact

Not having an effective process in place to distinguish and manage add-on service requests results in officers missing these complaints. This results in add-on requests not being addressed and an increased volume of follow-up calls from residents.

Complaints added onto existing service requests (5,335), accounts for approximately 10% of total complaints (52,423).



## Finding #2: A consistent process for reviewing open service requests is not in place

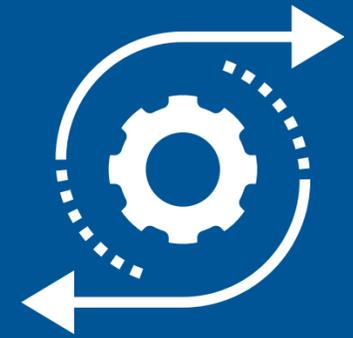
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### Condition

The City currently doesn't have a consistent process for reviewing dated open service requests. The timing and extent of reviews depend on individual officer preferences, and in many cases, older open requests are not reviewed regularly to ensure necessary action has been taken and the open status is correct.

It was also noted that:

- Open basement apartment service requests are not periodically reconciled with building permit data to identify what properties have been granted permits and can be closed.
- Over 1,400 service requests for “Driveway Widening” are still open. The enforcement of illegal driveways was temporarily suspended during COVID and currently, staff are waiting for the completion of the ward specific zoning and ward boundary reviews before they address these old open requests.
- The process for following up on open service requests assigned to summer students after their departure is inconsistent.





# Finding #2: A consistent process for reviewing open service requests is not in place (Cont'd)

Description	Open Service Requests as of April 15, 2024													
	2023		2022		2021		2018-2020		2015-2017		Pre-2015		Total	
	Open	%	Open	%	Open	%	Open	%	Open	%	Open	%	Open	%
Refuse	177	4%	47	1%	13	0.4%	57	1%	8	0.2%	21	1%	323	1%
Excessive Grass/Weeds	199	5%	24	1%	6	0.2%	26	0.4%	7	0.1%	204	2%	466	1%
PS Exterior Offences	340	12%	70	2%	63	3%	155	2%	36	0.3%	104	1%	768	2%
Basement Apartments	407	29%	101	8%	36	3%	238	5%	14	0.4%	45	1%	841	5%
Garbage Containers	29	2%	12	1%	11	1%	27	1%	1	0.1%	0	0	80	1%
Driveway Widening	233	37%	291	32%	357	49%	546	34%	14	1.0%	12	1%	1453	21%
Lodging house	184	30%	25	5%	21	3%	95	6%	4	1%	7	2%	336	8%
PS Interior Offences	37	12%	4	1%	9	3%	20	3%	5	1%	9	1%	84	2%
Vital Services	7	4%	2	1%	1	1%	4	1%	2	1%	6	1%	22	1%
Illegal Operations	51	15%	15	6%	10	5%	26	6%	9	2%	28	3%	139	6%
Other	182	19%	86	8%	50	4%	126	2%	33	1%	70	1%	547	3%
<b>Total</b>	<b>1846</b>	<b>11%</b>	<b>677</b>	<b>4%</b>	<b>577</b>	<b>4%</b>	<b>1320</b>	<b>3%</b>	<b>133</b>	<b>0.4%</b>	<b>506</b>	<b>1%</b>	<b>5059</b>	<b>3%</b>

% - Open service requests as a percentage of total service requests for the year

The majority of open service requests (64%) are from 2022 or prior

## Impact

An inconsistent process to review dated open service requests can result in missed service requests not being detected. Leaving dated and unactionable service requests open can overstate the volume of future work and increase the difficulty of planning enforcement activities.



## Finding #3: Officers on extended leave still receive service requests

### Condition

If an officer is expected to be away for longer than two weeks, Supervisors are supposed to create an IT ticket to remove the officer from the assignment list to prevent service requests being sent to the officer's task list while they are off work.

We reviewed 11 extended leaves (5+ weeks) among 9 employees. In 6 instances, officers continued to receive service requests while on leave with the average period of absence being 3.5 months. An average of 48 service requests were assigned during these leaves. Requests remained unactioned until the officers' return, causing delays.

### Impact

Continuing to assign service requests to officers on leave results in significant delays in responding to these requests.





## Finding #4: Staff does not track service request response time against the targeted timeline

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### Condition

As per standard operating procedures, an officer shall make a reasonable attempt to attend the property within 7 business days of receiving the complaint unless there is an immediate safety concern. However, we noted that enforcement staff does not track response time against the target.

Internal Audit staff obtained Amanda data from IT and calculated the response time: from the day that the service request was created to the day of the initial action.

Within the audit period:

- 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 request.
- For interior offences, 43% of service requests are responded to within 7 days, and 73% are responded to within 30 days.



# Finding #4: Staff does not track service request response time against the targeted timeline (Cont'd)



## Impact

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.

Description	Target (Days)	2021 - 2023 Service Request Response Days													
		0 - 7 Days		8 - 14 Days		15 - 30 Days		31-60 Days		61-90 Days		91+ Days		Total	
		#	%	#	%	#	%	#	%	#	%	#	%	#	%
Refuse	7	7,234	65%	1,895	17%	1,215	11%	468	4%	162	1%	77	1%	11,051	100%
Excessive Grass/Weeds	7	4,950	49%	2,047	20%	1,829	18%	785	8%	368	4%	188	2%	10,167	100%
P.S. 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	-	1,621	70%	313	13%	206	9%	98	4%	29	1%	58	2%	2,325	100%
Basement Apartment	7	1,329	35%	546	14%	829	22%	540	14%	226	6%	365	10%	2,326	100%
Lodging House	7	392	23%	179	10%	249	14%	224	13%	131	8%	547	32%	2,327	100%
P.S. Interior Offences	7	551	67%	122	15%	76	9%	38	5%	10	1%	20	2%	2,328	100%
Illegal Bus Operation	7	506	64%	122	15%	80	10%	52	7%	8	1%	27	3%	2,329	100%
Vital Services	1	462	99%	1	0%	1	0%	3	1%	1	0%	-	0%	2,330	100%
Other- Interior	-	327	44%	124	17%	153	20%	67	9%	27	4%	49	7%	2,331	100%
<b>Total</b>		<b>25,961</b>	<b>58%</b>	<b>7,419</b>	<b>17%</b>	<b>5,803</b>	<b>13%</b>	<b>2,868</b>	<b>6%</b>	<b>1,111</b>	<b>2%</b>	<b>1,716</b>	<b>4%</b>	<b>44,878</b>	<b>100%</b>

% - Service requests within the response range as a % of total service requests for the category in the audit period

Response date determined by date of the first note under "Attempts" in the inspection tab (Amanda)



## Finding #5: The City did not fully recover costs incurred to clean up private properties

### Condition

When a property owner is unwilling or unable to comply with orders to clean up the exterior of their property, the City will hire a contractor to do the clean-up. The costs incurred should be added to the property tax bill of the owner.

In our review, we found that:

- In 2023, 2 out of 156 invoices (\$1,079 total) were not added to the respective property tax bill.
- In 2022, 4 out of 139 invoices (\$1,826 total) were not added to the respective property tax bill.

The clean-up cost associated with these missed invoices was absorbed by the City.

### Impact

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.





# Finding #6: Service requests that have been cancelled do not always provide relevant information



## Condition

In the audit period, 660 out of 47,088 service requests, or 1.4%, were cancelled. We randomly reviewed 15 cancelled service requests and found:

- 3 cancelled service requests which noted “Duplicate Call” did not reference the related service request number
- 1 cancelled service request contained no notes indicating the reason for the cancellation nor did it reference a related service request number

## Impact

Cancelling a service request without referencing the 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.

More importantly, invalid cancellations means that the service request won't get addressed resulting in frustrated residents who may initiate another service request.



## Finding #7: Service requests for exterior offences are not always assigned to the correct offence category

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### Condition

When a complaint is made by phone or e-mail, Service Brampton creates the service request and selects the offence category (e.g., Refuse, Excessive Grass/Weeds, Property Standards Exterior Offences, etc.). The “Property Standards Exterior Offences” category is used to capture miscellaneous exterior offences related to roofs, chimneys, doors, porches, fence heights and rodent infestations, among others.

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.”

Refuse or Grass complaints incorrectly categorized as “Property Standards Exterior Offences” cannot be actioned by summer students since they are only authorized to action Refuse and Grass service requests.



## Finding #7: Service requests for exterior offences are not always assigned to the correct offence category (Cont'd)

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### Impact

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.





# How will our recommendations benefit the City?

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Acting on the recommendations outlined in this report will help the City to strengthen property standards enforcement processes and improve service delivery to residents.





PROPERTY  
STANDARDS  
AUDIT

Thank You



BRAMPTON