Building Permit Audit

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Claire Mu, CIA, CISA, CPA, CFA, MMPA, MFin.
Director, Internal Audit
Brad Cecile, CIA, CPA
Manager, Internal Audit

Internal Audit

BRAMPTON

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Executive Summary

Background

In Ontario, building permits are required for all construction and renovations. Building activity must comply with the Ontario Building Code. In 2023, Brampton issued 7,871 permits valued at over $2.3 billion and conducted 249,854 inspections. The Brampton Building and Business Portal, launched in 2024, streamlined the building permit process by allowing online submissions, status tracking, fee payments, and inspection scheduling.

The building permit process includes pre-screening applications, fee assignments, and thorough plan reviews to ensure compliance with building and zoning by-laws. Inspections are carried out at various stages of construction, and unpermitted construction activities are investigated and addressed through Orders to Comply. Callback requests related to building permits are managed through the City's customer relationship management system.

The recent *Greater Toronto Area Municipal Benchmarking Study, 3rd Edition* or *2024 BiLD* report by the Building Industry and Land Development Association highlighted significant improvements in Brampton's development application processing times, reducing them from 19.1 months to 14.1 months.

The 2024 BiLD report addressed the initial phase of planning and development, which includes reviewing and approving development applications and infrastructure requirements. This audit examines the subsequent phase—building permitting activities—and offers a roadmap for enhancing the City's permitting process.

Audit Objectives

The audit aimed to assess:

- whether Building has established policies and procedures that align with the Ontario Building Code, Building By-law, Zoning By-law, and City policies
- whether Building has proper processes in place to effectively manage the application pre-screening, payment, and building plans review processes
- whether Building has processes in place to effectively coordinate, complete and monitor building inspections and Orders to Comply
- whether Building has processes in place to ensure staff has the required qualifications
- whether Building has processes in place to ensure callback requests from residents are effectively managed

What We Recommend   This audit report recommends staff to:

1. **Continue to Improve Monitoring of Open Building Inspections**
   The process to monitor open building inspections should be improved to ensure the necessary steps to either revoke the permit or facilitate the completion of remaining inspections is actioned timely.

2. **Continue to Improve Process for Actively Monitoring Open Occurrences, Orders to Comply and Prosecution files**
   The process to monitor occurrences, Orders to Comply and prosecutions should be improved to ensure unpermitted construction is addressed timely and the risk of unsafe structures is mitigated.

3. **Continue to Monitor open Building Permit Applications**
   The process to monitor open building permit applications should be continued to regularly assess their status and facilitate timely permit issuance.

4. **Develop an Integrated Tracking System for Inquires and Complaints**
   A tracking system for inquiries and complaints should be developed that integrates with the portal and AMANDA to enable effective management of callback requests.

5. **Update Standard Operating Procedures**
   A comprehensive review and update of all SOPs should be conducted to ensure they reflect current practices, technologies and compliance requirements for core building permit activities.

6. **Conduct Technical Employee Audits**
   Evaluations should be performed for technical employees to ensure their work complies with Ontario Building Code, Building By-law, Zoning By-law and City policies.

Conclusion   Overall, the Building Division has adequate measures in place to manage the building permit process and utilizes system tools to manage permit activities, including the Brampton Building and Business Portal (an online customer service portal), AMANDA

(permit management), Bluebeam (building plan mark-ups) and mobiINSPECT (inspection management).

However, this audit also identified opportunities to improve operational effectiveness, strengthen compliance with regulatory standards, and enhance service delivery of building permit activities.

Implementing the recommendations in this report will enhance the processes and performance of building permit activities, which, when combined with improvements in the development application process, will strengthen the City's overall planning, development and building practices.

Management Action Plans   Building Division Management agrees with the findings and recommendations of this report. Management responses, together with management action plans are included in this report after each finding and recommendation.

Thank You to Management and Staff   We appreciate the cooperation and assistance of Building Division throughout the audit.

Distribution List

Standard Recipients   Members of Audit Committee

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Members of Council

Members of Leadership Team

KPMG LLP, Chartered Accountants (Statutory Auditor)
- Maria Khoushnood, Partner, Private Enterprise

Additional Recipients   Planning, Building and Growth Management
- Farhad Habibi, Chief Building Officer
- Roxanne Van Damme, Manager, Administration & Information Services
- Carolyn Crozier, Manager, Development Services

Background

A building permit ensures construction complies with the Ontario Building Code, promoting safe and regulated building developments.

A building permit is a formal permission to start construction and is legally required to construct, renovate, demolish or change the use of a building in Ontario. All construction must comply with the standards set out in the Ontario Building Code and other applicable laws. Building staff work alongside homeowners, building owners, contractors and engineers throughout the building permit process to ensure all construction activities within the City meet Ontario Building Code requirements. The Building division is part of the Planning, Building and Growth Management department.

The Ontario Building Code sets minimum standards for safety, accessibility and sustainability in building design and construction.

The Ontario Building Code sets minimum standards for the design and construction of new buildings and renovations to minimize risk to occupants' health and safety. The Code includes standards for health, public safety, fire protection, structural sufficiency, barrier-free accessibility, and resource conservation.

In 2024, the Building Division issued 7,379 permits, representing a total construction value of over $2.4 billion.

In 2024, Building issued 7,379 permits, representing a total construction value exceeding $2.4 billion. Staff conducted 218,730 building inspections.

There are currently 112 full-time permanent employees in Building across the 6 areas, including:
- Plans & Permits – 35
- Zoning & Sign By-law Services – 11
- Inspections – 37
- Standards & Training – 4
- Administration & Information Services – 18
- Innovation & Transformation – 3

The balance is made up of Building divisional management.

Besides full-time permanent employees, Building also has 8 part-time and/or contract employees.

All Building personnel work out of the Flower City Community Campus from Monday to Friday, 8:30-4:30. Building has approximately 40 City-owned vehicles that inspectors use to travel to construction sites.

Figure 1 illustrates the volume of building permits issued and the corresponding revenue from 2021 to 2024.
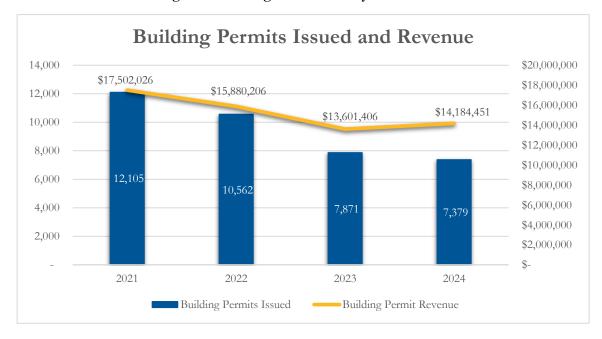
Figure 1: Building Permit Activity: 2021 to 2024

Building Permits Issued and Revenue

- $17,502,026
- $15,880,206
- $13,601,406
- $14,184,451

Year	Building Permits Issued
2021	12,105
2022	10,562
2023	7,871
2024	7,379

Legend: Building Permits Issued (bars) — Building Permit Revenue (line)

The Brampton Building and Business Portal, launched in June 2024, streamlines the building permit process online, from application to inspection scheduling.

Intake of Building Permit Applications

The "Brampton Building and Business Portal" went live in June 2024 and allows applicants to complete all steps of the building permit process online. After creating an account, the portal can be used to submit permit applications, check the status of applications, pay fees, receive permit certificates, schedule inspections, and upload documentation for Building staff.

Data in the portal is synced to AMANDA, the City's building permit and inspection management software. Prior to the implementation of the portal, applications were submitted through the City's website using an AgilePoint workflow. Status updates, permit issuances, and inspection bookings were communicated via e-mail.

Building permit applications undergo pre-screening to ensure all required information is included before the formal building plans review.

Building permit application pre-screening

All building permit applications are entered through the portal. Before the formal review of the permit plans, there is a pre-screening to ensure the application contains all the required information and documents to qualify for a review. The pre-screening is performed by staff from Zoning & Sign By-law, Administration and Information Services, and Plans & Permits. Once the application is accepted, an e-mail is automatically sent to the applicant notifying them their application has been accepted for review and the amount of the building permit fee(s) owing.

Building permit fees, automatically calculated by the portal based on permit type and scale, can be paid online.

Building permit application fees and payments
Building permit fees for each respective permit are defined in Building By-Law 387-2006. The portal automatically assigns permit fees based on the type and scale of each permit. Customer Service Plan Examiners ensure fees are correctly assigned and calculated properly before notifying the applicant that their permit has been accepted. Some standard fees are automatically calculated by AMANDA. The portal is integrated with AMANDA, Access to Gov (A2G), City's online point of sale (POS) system, PeopleSoft, and Moneris. Payments can be made via credit card through the portal, or in person at Flower City Community Campus by credit card, debit card, or cheque.

Building permit applications undergo a thorough review to ensure compliance with the Ontario Building Code, Zoning By-law, and Building By-law.

Building permit plans review
Building permit plans and documents are reviewed by Zoning Plans Examiners, Building Plans Examiners, Plumbing Plans Examiners, HVAC Plans Examiners, Permit Expeditors and staff from Administration and Information Services. The drawings and plans are examined during the review to ensure they follow the Ontario Building Code, Zoning By-law, and Building By-law. If a zoning change is needed or the proposed construction does not comply with the Building Code, the applicant is informed that a permit will not be issued until all application elements are in compliance. Permit reviews are managed in AMANDA and must be completed before the permit is issued.

Inspections must be requested through the portal and completed within Ontario Building Code required time frames.

Building inspections
Once a building permit is issued, the Building Code sets out each stage of construction requiring an inspection. The type and number of inspections depend on the specific building permit, and required inspections are listed at the bottom of each building permit certificate. It is the responsibility of the permit holder to notify the City that construction is ready to be inspected. Almost all inspections are requested through the portal. Upon notification by the permit holder, inspectors are required to carry out the inspection within the legislated time frame specified by the Building Code.

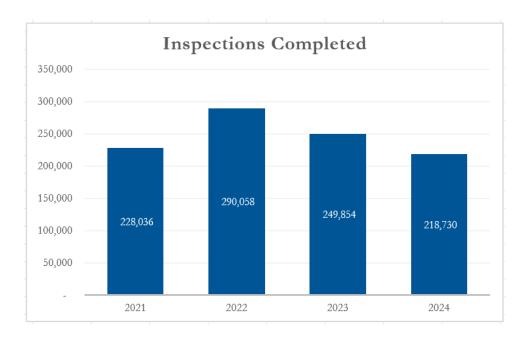**Construction must start within 6 months of the permit issuance date, or the permit may be revoked.**

The three types of inspections are building, plumbing, and HVAC, and the applicant must book the first inspection within 6 months of the permit being issued. Permit Expediters review building inspection activity in AMANDA to identify permits with no activity. If the permit holder has not scheduled an inspection within 5 months of permit issuance, an "Intent to Revoke" letter is sent, advising them they have 30 days to schedule their first inspection. A construction site visit is conducted to confirm construction has not started before a "Letter of Revocation" is sent and the permit is revoked. After the first inspection, each subsequent inspection must be scheduled within 12 months.

A Certificate of Final Inspection is issued once all inspections are complete.

MobiINSPECT, the City's building inspection software, is used to record all inspection information, including the inspection result and is synced with AMANDA. When inspections for all construction stages are closed, and required documentation has been submitted and accepted, a review is completed in AMANDA by Inspection Supervisors to ensure all inspections are complete. The building permit is then closed, and a certificate of final inspection is issued. Any construction resulting in a person(s) living in a newly constructed space, such as a new home, two-unit dwelling or garden suite, requires an occupancy inspection before the space can be inhabited.

Figure 2 displays the volume of building permit inspections completed from 2021 to 2024.

Figure 2: Inspections Completed: 2021 to 2024

Inspections Completed

Year	Inspections
2021	228,036
2022	290,058
2023	249,854
2024	218,730

In 2024, 987 occurrences of unpermitted construction were reported, prompting inspections and potentially leading to an "Order to Comply."

Occurrences and Orders to Comply

An occurrence is a complaint of construction activity that has taken place without a permit. Building Inspectors are made aware of occurrences in three ways:

1) Observation of unpermitted construction while on-site
2) Calls from residents placed through 311
3) Inspection requests from By-law enforcement (Property Standards)

When a possible occurrence is reported to Inspectors, an inspection is scheduled to determine if a violation of the Ontario Building Code has occurred. If it is determined that a violation has occurred, building inspectors issue an "Order to Comply" which includes specific directions on obtaining the necessary building permit. Building permits obtained that have a corresponding order are charged an additional 50% fee, on top of the defined fee amount. A total of 987 occurrences were reported in 2024.

Callback requests for building permits can be made via email or 311 and are managed through Outlook.

Callback requests

Complaints or inquiries relating to building permit-related activities can be e-mailed directly to the respective department or through 311/Service Brampton. Callback requests placed through 311 are stored in the customer relations management (CRM) software before being forwarded to Buildings' general e-mail account. From the general inbox, it is forwarded to respective Outlook accounts depending on the nature of the request. There are 8 outlook accounts within Building covering zoning, second units, signs, permit expediting, document inquiries, inspections, plans & permits and payments. All callback request correspondence and related documents are managed in Outlook.

The 2024 BiLD report focuses on development applications while this audit focuses on building permit activities.

The recent *Greater Toronto Area Municipal Benchmarking Study, 3rd Edition* or *2024 BiLD* report by the Building Industry and Land Development Association highlighted significant improvements in Brampton's development application processing times, reducing them from 19.1 months to 14.1 months.

The 2024 BiLD report addresses the initial phase of planning and development, which includes reviewing and approving development applications and infrastructure requirements. This audit examines the subsequent phase—building permitting activities—and offers a roadmap for enhancing the City's permitting process.

The building permits audit is part of the approved 2024 audit plan, with the last building permit and building inspection audits completed in 2017 and 2018 respectively.

Detailed Audit Findings

A: Building Inspection Monitoring Needs Continuous Improvement

Priority Rating **P2**

Background Once a building permit is issued, the Building Code sets out each stage of construction requiring an inspection. The type and number of inspections depend on the specific building permit. The permit holder must schedule the first inspection within 6 months of permit issuance. All subsequent inspections must be scheduled no more than 12 months apart. If the permit holder has not scheduled an inspection after 5 months, an "Intent to Revoke" letter is sent, advising them they have 30 days to schedule their first inspection. A construction site visit is conducted to confirm construction has not started before a "Letter of Revocation" is sent and the permit is revoked. If construction has started and one or more inspections have been completed, a permit will not be revoked even with over 12 months of inspection inactivity. Building will work with the permit holder and if necessary, issue an Order to Comply to push them to schedule the remaining inspections.

Criteria Issued permits should be monitored to ensure the applicant schedules the first inspection within 6 months of permit issuance, or the revocation process would start.

Subsequent inspection activity should also be monitored to ensure open inspections are scheduled at least every 12 months and are not dormant.

Condition A review of the inspection monitoring process noted the following:

1. The monitoring process to ensure the initial inspection is scheduled within 6 months of permit issuance is inconsistent. For most issued permits, the first inspection took place within 6 months; however, some exceeded the legislated 6-month timeframe or were not scheduled at all.

   An "Intent to Revoke" letter has not been sent for most of the permits without a first inspection.

Table 1: Issued Permits - Building Inspections

Issued Permits - Building Inspections as of Dec. 31, 2024											
Inspections	2024		2023		2022		2021		TOTAL	
	#	%	#	%	#	%	#	%	#	%
First Inspection within 6 Months	2,632	92%	5,399	87%	7,441	89%	7,815	85%	23,287	87%
First Inspection after 6 Months	6	0%	300	5%	342	4%	788	9%	1,436	5%
First Inspection not Scheduled - Intent Letter Sent	159	6%	42	1%	267	3%	111	1%	579	2%
First Inspection not Scheduled - No Intent Letter Sent	68	2%	496	8%	306	4%	450	5%	1,320	5%
TOTAL	2,865	100%	6,237	100%	8,356	100%	9,164	100%	26,622	100%
*2024 - Only includes permits issued until to June 30, 2024										
*Categories included above are Residential, House Miscellaneous, Commercial, Industrial and Institutional										

2. The process for monitoring open inspections for inactivity is inconsistent. For the majority of issued permits, inspections are scheduled within 12 months; however, within the audit period, approximately 9% of permits have had periods of no inspections that exceeded 12 months. We observed that there are no notes in the system indicating the reason for the delay.

A review of open inspections for commercial properties found that 8 out of 20 commercial businesses operate without having completed the mandatory occupancy inspection and final inspection. These inspections are required under the Ontario Building Code and are essential to ensure compliance with safety, structural, and regulatory standards before occupancy.

Table 2: Issued Permits - Open Building Inspections

Issued Permits - Open Building Inspections with over 12 Months of Inactivity as of Dec.31, 2024								
Inspections	2023		2022		2021		TOTAL	
	#	%	#	%	#	%	#	%
Inspections - less than 12 months of inactivity	5,067	81%	6,996	84%	7,810	85%	19,873	84%
First Inspection not scheduled	538	9%	573	7%	561	6%	1,672	7%
Inspections - more than 12 months of inactivity	635	10%	792	9%	800	9%	2,227	9%
TOTAL	6,240	100%	8,361	100%	9,171	100%	23,772	100%
*Categories included above are Residential, House Miscellaneous, Commercial, Industrial and Institutional								

Issued permits should be monitored continuously to ensure the initial inspection and subsequent inspections are scheduled and completed within the OBC-mandated timeframes.

We noted that Building staff started to address these legacy permits during the course of the audit.

Cause   Staff advised that the high volume of required inspections and challenges in maintaining adequate staffing levels have led to prioritizing daily inspections for recently issued permits. As a result, Building currently lacks the capacity to monitor outstanding legacy inspections effectively.

Impact   The absence of a comprehensive process to monitor open building inspections could lead to inspections being completed outside the OBC-mandated timeframes. This increases the risk of homes and businesses being occupied without the required inspections, posing a potential threat to public safety.

Recommendation:

1. **Continue to Improve Monitoring of Open Building Inspections**
   The *Chief Building Officer* should continue to improve monitoring of open building inspections to ensure timely permit revocation or completion of remaining inspections.

Management Response: ☒ Agree   ☐ Disagree

Comments/Action Plan
Thousands of permits issued since 1999 remain open, and we are currently undertaking a significant project to address these legacy permits and bring them into compliance. This involves actively following up on dormant permits by either revoking them or issuing orders to facilitate compliance, ensuring all outstanding inspections are completed or permits are closed appropriately. We focus on implementing a systematic process to monitor new and legacy permits, ensuring inspections are scheduled and completed within the Ontario Building Code's mandated timeframes. These efforts aim to enhance compliance, improve safety, and reduce the risk of unauthorized occupancy in homes and businesses.

Timeline: Q2, 2026

Background   An "Occurrence" is a complaint of construction activity that has taken place without a permit. When a possible occurrence is reported to Inspectors, a site inspection is conducted, and if it is determined that a violation has occurred, building Inspectors issue an "Order to Comply." The order includes specific directions on obtaining the necessary building permit. Generally, when property owners are found to have undertaken construction without a permit, they are ordered to return the project to its original state or to submit a building permit application within 30 days. If compliance is deemed not to have been achieved with the Order to Comply, then the Inspector can initiate a "Prosecution Request" against the property owner. Prosecutions are brought to trial in Provincial Court and property owners convicted of a contravention(s) of the Building Code Act can face penalties and fines.

Criteria   Occurrences should be monitored to ensure any potential violations are investigated timely and, if warranted, the corresponding Order to Comply is created.

Orders to Comply should be monitored to ensure the property owner has taken the necessary steps to comply, including commencing the building permit application process.

Prosecution Requests should be monitored to ensure prosecution files for Ontario Building Code violations are completed correctly and timely.

Condition   We reviewed Occurrences, Orders to Comply and Prosecution Files and noted the following:

1. The process to monitor open Occurrences and Orders to Comply is inconsistent:
   - 81% of open Occurrences were started prior to 2024. There are no recent notes to indicate the status of many files.
   - 80% of open Orders to Comply were started prior to 2024. 20 Orders to Comply were randomly selected, and it was found that the building permit application had not been started for 6 of them, all from 2023 or before. No recent notes indicate the reason for the delay or the order status.

Table 3: Open Occurrences and Orders to Comply

Open Occurrences and Orders to Comply as of Dec. 31, 2024													
Permit Type	2024		2023		2022		2021		2018-2020		Pre-2018		Total	
	#	%	#	%	#	%	#	%	#	%	#	%	#	%
Occurrence	466	19%	466	19%	442	18%	401	16%	562	23%	107	4%	2,444	100%
Order to Comply	397	20%	330	16%	407	20%	237	12%	438	22%	192	10%	2,001	100%

2. The status of Orders to Comply and Occurrences is not always current:

- We randomly selected 15 occurrences with "Under Investigation" status and found that for 6 of them, either an Order to Comply was issued, a building permit was issued or the investigation found no violation. These 6 should be "Closed".

- We randomly selected 20 Orders to Comply with "Issued" status and found that a corresponding building permit was issued for 10 of them, so the status should be "Cleared."

Occurrences should be monitored on an ongoing basis to ensure all potential violations are investigated in a timely manner. Orders to Comply should also be monitored to ensure the requirements of the order have been met, including the commencement of the building permit application process.

3. The process for monitoring open prosecution files is not consistent. From 2022 – 2024, out of the 140 Orders to Comply assigned to be prosecuted, only 22 advanced to Prosecution Folders.

Prosecution files should be monitored to ensure timely completion at each stage of the process. The review should ensure that all Orders to Comply with the status of "Prosecution Requested" are entered as "Requests for Legal Action Forms," all "Requests for Legal Action Forms" are properly completed, approved, and advanced into Prosecution Folders, and all Prosecution Folders are complete and forwarded to Legislative Services.

Staff informed us that the Building Department has recently filled the vacant Regulatory Coordinator position to focus on addressing unpermitted construction and compliance issues.

Table 4: Completion of Prosecution Files

Completion of Prosecution Files as of Dec. 31, 2024						
Stage	**System**	**2024**	**2023**	**2022**	**Total**	**Area**
Order to Comply Folder (OT) - "Prosecution Requested"	Amanda	63	64	13	140	Inspector
"Request for Legal Action Form" - Created	AgilePoint	24	60	3	87	Inspector
"Request for Legal Action Form" - Completed		8	38	2	48	Inspector, Supervisor, Permit Expediter
Prosecution Folder (PR)	Amanda	0	21	1	22	Permit Expediter

Cause Staff advised that Occurrences and Orders to Comply are monitored by the same Inspectors who perform daily inspections, and it is an ongoing challenge to keep up with the growing volume of these files. It was also noted that prosecution files have not been given the attention they deserve due to limited staffing resources.

Impact Without a comprehensive process to monitor open Occurrences, Orders to Comply, and Prosecution files, the City cannot ensure potential violations are properly investigated, complied with or prosecuted. This could lead to delays in addressing unpermitted building structures, potentially posing a risk to public safety.

Recommendation:

2. **Continue to Monitor Open Occurrences, Orders to Comply and Prosecution files**
    The *Chief Building Officer* should continue to monitor Open Occurrences, Orders to Comply, and Prosecution files to ensure timely resolution of unpermitted construction and mitigate the risk of unsafe structures.

Management Response: ☒ Agree   ☐ Disagree
Comments/Action Plan
The Regulatory Coordinator position, which had remained vacant for over four years (recently filled – Jan 2025), along with the manager of standards and training, has been strengthened and restructured to focus on supporting prosecution efforts and enhancing the monitoring of open occurrences and Orders to Comply. This restructuring ensures a more dedicated approach to addressing unpermitted construction and compliance issues. To improve monitoring, we are implementing a systematic process to actively track open occurrences and Orders to Comply. This will ensure timely investigations, accurate status updates, and follow-through on compliance actions, reducing delays in addressing violations and mitigating risks associated with unsafe structures. **Timeline:** Q1, 2026

C: Monitoring of Inactive Building Permit Applications Needs Continuous Improvement

<div align="right">Priority Rating   <mark>**P2**</mark></div>

Background Once a building permit application has been accepted, Plans Examiners perform a detailed review of the building plans. If there are any deficiencies, they will issue a notice to the applicant outlining the re-work required for the plans to comply with the Building Code, Zoning by-laws, or other Applicable Law. A building permit remains in "Applied" status in AMANDA until all regulatory requirements are met.

Criteria All building permit applications in the "Applied" stage should be followed up regularly to verify their status and determine the best path to permit issuance.

Condition We reviewed open building permit applications for residential, industrial, commercial, and institutional buildings, and found that the City lacks a consistent approach to monitoring and following up on aged open permit applications.

These permit applications are open because the applicant has not fulfilled a re-work request. Most of these files do not have any notes to indicate recent correspondence with the applicant, making it difficult to assess the extent to which open permit applications are being monitored.

We noted that Building staff started to address these open permit applications during the course of the audit.

Table 5: Open Permit Applications

Open Permit Applications as of 12/31/2024														
Permit Type	**2024**		**2023**		**2022**		**2021**		**2018-2020**		**Pre-2018**		**Total**	
	#	%	#	%	#	%	#	%	#	%	#	%	#	%
Residential	454	72%	54	9%	24	4%	53	8%	40	6%	2	0%	627	100%
Home Miscellaneous	148	61%	26	11%	23	10%	16	7%	20	8%	8	3%	241	100%
Commercial	54	58%	9	10%	6	6%	4	4%	12	13%	8	9%	93	100%
Industrial	59	55%	15	14%	5	5%	14	13%	10	9%	4	4%	107	100%
Institutional	21	60%	2	6%	0	0%	2	6%	7	20%	3	9%	35	100%
TOTAL	**736**		**106**		**58**		**89**		**89**		**25**		**1,103**	

Staff should have a formal process in place to monitor open permit applications and ensure timely assessment of incomplete re-work so that the necessary action can be taken to either cancel the permit application or facilitate the permit's issuance.

Cause   Staff advised that current building permit applications are prioritized over legacy applications and there are not always enough staff to effectively monitor and follow up on aged incomplete applications.

Impact   The absence of a comprehensive process to monitor and review aged building permit applications does not allow for a timely resolution of open applications and increases the risk that construction proceeds without the required permit.

Recommendation:

3. **Continue to Monitor open Building Permit Applications**
   The *Chief Building Officer* should continue to monitor open building permit applications to assess their status and facilitate timely permit issuance.

Management Response: ☒ Agree   ☐ Disagree

Comments/Action Plan
Efforts are underway to achieve full staffing in the Permit Expeditor team, with 2 out of 4 positions currently filled. This team is primarily responsible for following up on inactive permit applications and deeming them abandoned when necessary. While following up on inactive permits is purely a courtesy and not mandated by the Act, filling these positions will enhance our ability to efficiently address aged applications.

Additionally, we are developing an automated process to assist in monitoring and managing inactive permits. This initiative aims to streamline follow-up procedures, facilitate timely resolution of open applications, and reduce the risk of unauthorized construction.

Timeline: Q1, 2026

D: The Process for Managing Callback Requests Needs Improvement   **Priority Rating**   <mark>**P2**</mark>

Background   Inquiries or other requests related to building permits are received either through 311 via customer relations management (CRM) software, or e-mailed directly to Building. Requests received through CRM are forwarded to the respective Outlook e-mail account, depending on the nature of the request. There are 8 outlook accounts within Building, covering zoning, second units, signs, permit expediting, document inquiries, inspections, plans & permits and payments. Each Outlook account is shared, so all employees within a department have access and can respond to the request. In 2024, there were approximately 4,000 callback requests through CRM and at least double that amount e-mailed directly by residents totalling at least 12,000 callback requests.

Criteria   Building should have an effective and efficient process for managing permit-related callback requests from homeowners, builders and residents.

Condition   We reviewed the callback request process and noted that the process is very manual, lacks controls and does not provide effective data or reports for monitoring. The limitations in the current process include:

- For callback requests responded to by phone, there is no record of the response. In most cases, once the resident is contacted, the callback request e-mail is deleted
- Outlook lacks reporting capabilities and cannot efficiently show the number of callback requests received or their status (Open, In-progress, Closed) for a certain period
- Inability to track the average response time for each category does not allow Managers to identify potential training opportunities
- There is no place to enter notes or information regarding the outcome of the callback response which limits information sharing among staff
- Managing callback requests in Outlook does not allow for workflow reviews or approvals
- There is no automatic e-mail informing the resident that their request has been received and the estimated response date.

Based on the annual volume of callback requests and the importance of communication with residents, implementing a formal request tracking software would provide a consistent, transparent, and effective method for managing requests across the division.

Cause   Staff advised that they do their best to manage requests within the current system. However, due to the volume of calls, it can be difficult to efficiently track callback responses. They also feel they would benefit from a centralized system with record tracking to ensure no callback requests slip through the cracks.

Impact   The absence of a callback request tracking system reduces visibility into requests, hinders the ability to maintain accurate data records or perform data analysis, and increases the risk of delayed detection of unactioned requests.

Recommendation:

4. **Develop an Integrated Tracking System for Inquiries and Complaints**
   The *Chief Building Officer* should develop a tracking system for inquiries and complaints that integrates with the portal and AMANDA to enable effective management of callback requests.

Management Response: ☒ Agree   ☐ Disagree
Comments/Action Plan With over 12,000 callback requests recorded annually, alongside thousands more handled through direct phone calls and in-person visits, it has been a challenge to manage and track these interactions effectively. The lack of a centralized tracking system has made it difficult to keep accurate records and monitor responses. To address this, we are advancing phase two of the new portal project by developing an integrated tracking system for inquiries and complaints. This system will work seamlessly with the portal and AMANDA, enabling us to manage requests efficiently while maintaining detailed records of communications. These efforts will improve transparency, enhance accountability, and ensure residents receive timely and effective responses. **Timeline:** Q1, 2026

E: Standard Operating Procedures Need Updating to Align with Current Practices

Priority Rating   `P2`

Background   The main processes within Building are captured in formal Standard Operating Procedures (SOPs) which provide information and guidance on the necessary steps to complete a task. The SOPs in place span all areas of Building including: Administration, Plans & Permits, Inspections, and Zoning.

Criteria   SOPs should be reviewed and updated regularly to ensure guidance is relevant and reflects intended practices.

Condition   The review found that SOPs related to the Brampton Building and Business Portal have been updated to reflect the new system, however, most of the other SOPs have not been reviewed or updated for an extended period.

There are currently 99 SOPs with the majority created before 2010, including 13 from before 2000. All SOPs are on the outdated template which does not contain the "Reviewed By" or "Review Date" fields on the first page, making it difficult to determine when the last review was completed and by whom.

Many of the SOPs have content referencing process steps, IT systems or protocols that are no longer relevant.

Cause   Staff advised that standard processes are communicated to all employees, however, formal written processes have not been updated in a long time. A project to review and update all SOPs within Building is currently underway.

Impact   Outdated SOPs can cause confusion among staff and result in incomplete or inconsistant processes. This issue may be further exacerbated by high staff turnover experienced in some areas of Building.

Recommendation:

5. Update Standard Operating Procedures
   The *Chief Building Officer* should review all Standard Operating Procedures to ensure they reflect current practices, technologies and compliance requirements.

Management Response: ☒ Agree   ☐ Disagree

Comments/Action Plan

Our Standards and Training team, currently comprised of a manager and one staff member, handles a broad range of responsibilities, including home builders, subdivision plans, prosecutions, and orders. While this team is small, we are working collaboratively by utilizing staff from other teams to assist in reviewing and updating Standard Operating Procedures (SOPs). A project is already underway to address outdated SOPs and align them with current practices and technologies.

Given the volume and complexity of permits, as well as the growing size of our department, having a dedicated Policy Coordinator to continuously review and update SOPs and policies would be highly beneficial. This role is being considered as part of the 2026 budget proposal to ensure sustained improvements and consistency in our processes.

Timeline: Q3, 2025

F: Technical Employee Audits should be Conducted in Accordance with Standard Operating Procedures	Priority Rating	P3

Background The Technical Employees Auditing Program SOP was created in 2018 to achieve a consistent approach to enforcing the Building Code Act, Zoning and Sign By-laws, and other regulations across the Building Division. The procedure outlines how the work processes of technical employees are to be audited by their immediate Supervisors regularly. The term "technical employees" refers to any active employees within Plans and Permits, Inspections, Zoning and Sign By-law Services or Permit Expediters.

Criteria Technical employee audits are conducted by Supervisors for all new technical employees within the first four months of employment, and at least bi-annually for all other technical employees.

Condition We reviewed the technical employee audit program and found that technical audits are not conducted consistently. Based on discussion with staff, two out of the four areas requiring technical audits have not conducted technical audits since 2022, one area has not conducted technical audits since 2023, and one area has completed technical audits for only some employees in 2023 and 2024.

Amid ongoing amendments to the Ontario Building Code and other regulations and regular staff turnover, technical audits serve as a valuable tool for evaluating employee performance and ensuring compliance with technical and service level requirements.

Cause   Technical employee audits have not been performed, either due to a lack of awareness of this requirement or because workload demands took priority.

Impact   The lack of regular technical audits prevent Supervisors from identifying and addressing work processes that are inefficient, ineffective or do not comply with the Ontario Building Code, Zoning By-law or other regulations.

Recommendation:

6. Conduct Technical Employee Audits
The *Chief Building Officer* should ensure evaluations are performed for technical employees to ensure that they comply with Ontario Building Code, Building By-law, Zoning By-law and City policies.

Management Response: ☒ Agree   ☐ Disagree

Comments/Action Plan
With the leadership team now operating at full complement, addressing the consistency of technical employee audits is a key priority this year. For many years, the leadership team faced significant vacancies, with 40-50% of positions often unfilled, which limited our capacity to conduct regular audits.

Now that we have the resources in place, we are committed to ensuring technical employee audits are conducted as outlined in the SOP. These audits will help assess performance, identify training needs, and ensure compliance with the Ontario Building Code, Building By-laws, and City policies, strengthening the integrity of our processes across all technical areas.

Timeline: Q4, 2025

Audit Objectives, Scope and Methodology

Objective   The audit reviewed processes and controls around building permits to assess whether they are adequately designed, operating effectively, and compliant with relevant legislation. Specifically, this engagement assessed whether Building has:

- established departmental policies and procedures ensuring alignment with the Ontario Building Code, Building By-law, Zoning By-law and City policies and procedures
- implemented processes to manage the building permit pre-screening, payment and collection, and permit plans review process effectively
- implemented processes to coordinate, complete and monitor building permit inspections effectively
- implemented processes to ensure staff have the required qualifications and receive ongoing training to effectively perform their duties
- implemented processes to ensure building permit and inspection-related callback requests are effectively monitored and managed.

Scope   Our audit scope covered building permit and inspection activity from January 1, 2021, to October 31, 2024.

Methodology   Our audit methodology included the following:

- reviewing policies and Standard Operating Procedures guiding building permit activities
- interviewing staff in various divisions involved in the building permit process
- using sample testing and data analytics to assess efficiency, effectiveness and compliance of building permit activities
- participating in a ride-along with inspectors to observe inspection processes.

Appendix 1: List of Figures and Tables

List of Figures

List of Tables

Appendix 2: Criteria for Assigning Ratings to Audit Findings

Priority Rating	Description
Priority 1 (P1)	One or more of the following conditions exist that require immediate attention of the Senior Leadership Team. Corrective actions by senior Management must be implemented. • Financial impact of both actual and potential losses is material • Management's actions, or lack thereof, have resulted in the compromise of a key process or control, which requires immediate significant efforts and/or resources (including time, financial commitments, etc.) to mitigate associated risks. Failure by Management to remedy such deficiencies on a timely basis will result in the City being exposed to immediate risk and/or financial loss • One more of the following conditions is true: i) management failed to identify key risks, ii) management failed to implement process and controls to mitigate key risks • Management's actions, or lack thereof, have resulted in a key initiative to be significantly impacted or delayed, and the financial support for such initiative will likely be compromised • Management failed to implement effective control environment or provide adequate oversight, resulting in a negative pervasive impact on the City or potential fraudulent acts by City staff • Fraud by Management or staff, as defined by the Corporate Fraud Prevention Policy (Policy 2.14)

Priority 2 (P2)	One or more of the following conditions exist that require attention by senior Management. Corrective actions by Management should be implemented. • Financial impact of both actual and potential losses is significant • Management's actions, or lack thereof, may result in a key process or control to be compromised, which requires considerable efforts and/or resources (including time, financial commitments etc.) to mitigate associated risks • Management correctly identified key risks and have implemented processes and controls to mitigate such risks, however, one or more of the following is true: i) the processes and controls are not appropriate or adequate in design, ii) the processes and controls are not operating effectively on a consistent basis • Management's actions, or lack thereof, have impacted or delayed a key initiative, and the funding for such initiative may be compromised • Management failed to provide effective control environment or oversight on a consistent basis, resulting in a negative impact on the respective division, or other departments • Management failed to comply with Council-approved policies, by-laws, regulatory requirements, etc., which may result in penalties • Management failed to identify or remedy key control deficiencies that may impact the effectiveness of anti-fraud programs
(Priority 3) P3	One or more of the following conditions exist that require attention by Management. Corrective actions by Management should be implemented. • Financial impact of both actual and potential losses is insignificant • A non-key process or control, if compromised, may require some efforts and/or resources (including time, financial commitments, etc.) to mitigate associated risks • Processes and controls to mitigate risks are in place; however, opportunities exist to further enhance the effectiveness or efficiency of such processes and controls. Management oversight exists to ensure key processes and controls are operating effectively • Minimal risk of non-compliance to Council-approved policies, by-laws, regulatory requirements, etc. • Low impact to the City's strategic or key initiative • Low impact to the City's operations