

atfocus

Enforcement Review Final Report

March 22, 2024

Project Overview

The City engaged AtFocus to conduct an operational review of the Enforcement and By-law Services Division. The scope of the review included the following:

- The 3 areas of the Enforcement Division (Municipal, Licensing and Property Standards). Gathering and analysis of available data on the number and types of Enforcement Service Requests
- Process mapping from initial 311 contact to closing the Service Request by Enforcement
- An enforcement staff web survey to understand the challenges and possible areas for improvement
- A focus group of the Enforcement Management team (Acting Commissioner, Acting Director, Acting/Permanent Managers)
- Discussions with 311 to determine their process and data
- Interview with the Chair and Vice Chair of Legislative Services
- Several other interviews, online staff engagement, and focus groups as necessary
- A final report outlining recommendations. Please note: due to the limited timing of the review, detailed research on some of the recommendations was not possible. As such, some of the recommendations point to areas of concern and recommend further review and analysis

The review began in early January 2024 and was to be completed by mid-March 2024 (a timeline set by the City in order to report back to Council within the specified timeframe). Typically, this type of review would take four+ months to complete. To assist in compacting the time to complete the review, the City reduced the scope of the review.

The scope of the review did not include

- External research (customer surveys, focus groups, experience mapping, best practice research, etc.)
- Detailed process mapping the steps conducted in the field by officers
- Detailed process review in specific areas such as dispatch, CRM, or Amanda functionality
- Detailed calculation/review of staffing requirements, staff skills, pay levels, or organization review
- The relationship/processes with other Divisions – although a short web survey was completed with those having dealings with the Enforcement Division
- A review of specific by-laws or enforcement sub-types
- A review of 311 operations and the support they provide to the Enforcement Division
- An implementation plan including the costing of recommendations

In support of this project, the City provided a subject matter expert to complete the majority of data gathering and the process mapping.

Definitions

Within this report, specific terms are used. These are:

- “Customers”. This is meant to represent residents, taxpayers, business owners, visitors, stakeholders, communities, and community groups
- “Service Request (SR)” is anything that is assigned to an Enforcement Officer (EO). These can be in the Customer Relationship Manager (CRM) system or in Amanada (the system integrated with CRM that the Enforcement Division uses to manage SRs). Internally, SRs are also referred to as files, cases, folders
- “Callback” are requests made by customers to have someone call them back with information. These are not logged in the CRM or Amanada as an SR. Complaints are included in Callbacks and are not separated from other types of Callbacks (e.g. information-only requests). Callbacks require the Enforcement Division to follow up on and call the customer back
- “Escalation” is used when Councillors email/call the Enforcement Division to follow up
- “311” is used to refer to Service Brampton
- “Enforcement Officer (EO)” means a municipal/by-law enforcement officer, including a property standards officer
- “Enforcement” includes all three areas of the Enforcement and By-law Services Division
- “Proactive” enforcement includes a model that involves using intelligence led enforcement (e.g. heat maps, identification of high complaint zones) education and collaboration with the community to establish a trusting environment where enforcement is seen as a positive action

Drivers of Customer Behaviour

Although customer research was not part of the scope of this project, it is important to point out some factors that will continue to have an impact on expectations from the Enforcement and By-law Services Division. The City, like all public sector organizations, is experiencing new customer expectations that are being driven by evolution and adoption in the private sector. In the past, customers tolerated a different expectation of the public and the private sector in the area of customer service. This was before major innovation took place in the private sector. As customers were exposed to more online self-serve, 24x7 service availability, multi-channel experiences, faster/immediate service delivery, and technology- driven services, they became more demanding of the public sector. As demographic shifts occurred and in particular in this age of convenience, additional pressures to keep up with the private sector settled in and now customers have equal expectations from both the private and public sector.

Findings and Analysis

A significant amount of data was collected during the review process. This data has been grouped into the following 2 areas:

- Interviews, Focus Groups, and Web Surveys (Enforcement staff and staff who have dealings with the Enforcement Division)
 - Process Maps and Processes, including Standard Operating Procedures (SOPs)
- Enforcement Data and Operational Information
 - Hours of Operation
 - Service Request Profile
 - Service Expectations
 - SR Volume and Trends
 - EO Staffing and Workforce Management

The external environment is contributing to the challenges faced by the Enforcement Division. Some of the root causes are steeped in the growth of the City. As the number of residents and business increase so does the need for parking and business licenses. If these needs are not met, infractions increase. In addition, other infractions increase such as loud noise, refuse, and snow removal. But those are not the only root causes of dissatisfaction. This ever-increasing demand on Enforcement poses a real dilemma ... how to support the needs of the customer/citizen cost-effectively, balanced with the need to enforce and maintain its necessary by-laws and requirements in a City of a growing population (residents, visitors, businesses).

The findings and analysis detailed in the section that follows have been instrumental in developing the recommendations that follow later in this report.

An overview of the findings and analysis shows that:

- The challenge facing the Enforcement Division and the City is complex and multifaceted
- There is no quick fix to the issues facing the Enforcement Division. A multi-prong approach is required to make a significant and sustainable impact
- Staff morale is an issue that must be addressed. Creating a more supportive environment is a first step to improving the division's culture
- An increase in staffing (FTEs) is immediately required to stabilize the organization and to bring relief to the current high pressure/demand. An increase in FTEs is also required in order to implement some of the recommendations in this report. However, increasing FTEs alone, over the long term, will not address the root cause affecting current customer issues
- Attention to improved internal operating practices and improved supporting technology must be addressed
- Improved communication, both internal and external, is essential for success

Towards the end of this review, a permanent Commissioner and Director were hired. Although these individuals were not part of the initial review, we were able to discuss the work and were provided with initiatives that have already begun to address some of the issues highlighted in this report. The following are examples of steps that already have been taken which should contribute to both customer service and improving the culture.

- **More comprehensive information is being provided to the customer:** An increase in the level of detail provided by Enforcement staff when callbacks are requested. Previously, the update would be a standardized statement, and if additional information was requested, customers would be directed to submit an FOI request. For example, this included instances where there was no enforcement taken as the vehicle owner had appropriately obtained a parking permit. This left the complaining customer believing that no action was taken as no tow or ticket occurred. Responses are now to include what specific action was taken (e.g. warn or issue a violation) or an explanation as to why no enforcement action was taken (e.g. owner appropriately obtained a parking permit)
- **Improved communications with EOs:** A regular practice of the Director visiting each work group, including the night shift teams, has begun. The intent of these visits is to improve communication with EOs. Information is provided that otherwise EOs may not easily be exposed to. In addition, EO questions are answered and a positive environment is being focused on by reinforcing that EOs are appreciated and are a valuable part of what makes the community work
- **New committees to implement change:** New committees have been established to begin to address the culture and work environment. The committees include:
 - Enforcement and Service Delivery Committee
 - Vehicle Users Committee
 - 311 Working Group

Results of Interviews, Focus Groups, and Web Survey

Below is a summary of the themes that emerged from the information gathered from staff and Councillors in the interviews, focus groups, and web surveys (please note, these are not recommendations).

- **Brampton is a Growing City:** The growth of the City is causing a significantly increased demand for enforcement: With the addition of housing/rental units, new legislation/policies, population growth, number of vehicles, buildings, etc., comes a significant pressure on enforcement
- **The Situation is Critical:** Overwhelming recognition by all participants that the situation is critical and improvements are required
- **Recent/Planned Improvements Will Have an Impact:** There are a number of projects/upgrades that are currently being worked on that are expected to assist with enforcement (e.g. GPS in vehicles, electronic ticketing, improved website, weekly staff meetings, the establishment of a training committee to address what EOs need training on, the establishment of a staff resource network and enhancement committee)
 - Enhanced Service Request Status documentation/codes have been implemented in September 2023 which may assist in reducing Callbacks and escalations as they provide improved reasons for SRs that have been closed
- **Organizational Stability is Required:** The organization has many positions at the management level in an acting capacity. At the time of the review, the Commissioner, Director, and 2 of the Manager positions were filled by acting assignments (please note, subsequently, as the review was ending, the Commissioner, Director, and 1 Manager position were filled permanently)
- **A Proactive Model is Needed:** The enforcement model should transition toward a more proactive approach, utilizing a progressive enforcement model whereby education and collaboration are prioritized (Moving from a transactional service provider to a transformational service provider)However, increasing proactive enforcement, even if phased, will impact SR response times without additional EOs, potentially increasing escalations. As with any change, effective communication strategies will be crucial to manage customer expectations throughout the transition. If transitioning to a fully proactive model immediately is not acceptable, then securing additional EOs will be necessary to begin implementing the progressive enforcement model we outlined.
- **Customers Need to See Enforcement as Supporting a Safe Community:** For a long-term behavioural change, customers need enforcement support to ensure community safety, health, and well-being. This may require a change in the EO uniform, the command and control model and culture. In addition, by-laws should be communicated in a manner that reaffirms and supports what the City is striving towards (healthier, safer communities)
- **Communication With the Community and Internally Must Improve:** Communication improvements are required to be more effective. More specifically, communication improvements are required:
 - With EOs by involving them in problem-solving, meeting with them, supporting them, and accompanying them on the road
 - Across the City in dealings with Enforcement to promote an improved understanding, a more collaborative and cohesive network when changes to policy and procedures occur
 - With customers to manage expectations by communicating the priority definitions for SR and the approximate response time by priority level for municipal enforcement e.g. overnight parking is a priority 3

- **EOs do not Have Sufficient Capacity:** The level of Service Requests (SRs) has significantly increased over the past several years and a large number of those SRs are not being actioned (e.g. being closed without investigation). The capacity of EOs must be increased to meet the SR volume. Suggestions provided include:
 - Hire additional EOs to keep up with the increasing number of SRs
 - Improved ability to address the high level of time away from enforcement duties (this would include project work, sick days, additional time off, etc)
 - Consider re-implementing 3 shifts and/or tiered staffing model to manage backlog that occurs between the current 2 shift model
- **Technology Improvements are Required:** Outdated or lack of supporting technology exists. This includes areas such as outdated cars, insufficient connectivity while out on patrol, useful in field technology such as mobile applications and tablets, CRM/Amanda capability (e.g. authentication), lack of management technology such as staffing calculators and workforce management tools contribute to inefficiency of officers
- **A Stronger Relationship with Council is Needed:** A more cohesive and aligned relationship is required to solve the root cause of problems facing enforcement in a growing city. A significant amount of time is being spent on Councillor enquiries. Councillors indicated that they need more detailed information such as knowledge about the process for handling SRs and the adherence to Standard Operating Procedures (SOPs). Council requires assurances that Enforcement is following approved procedures
- **Customer Expectations Must Be Aligned:** High expectations of customers are not aligned with the priority coding of SRs resulting in an increased number of complaints and escalation to Councillors. Improved communication back to the customer on the status of the SR and how it was resolved is necessary
- **There is an issue with Fairness and Equity:** A feeling of possible inequity in dealing with customers and the distribution of SRs
- **Accuracy of SR Issuance Needs Addressing:** Many areas require improvement during the SR intake process. In particular, the information gathered for SRs is missing/inaccurate which causes delays in attending to the SR. The dispatch process, the priority ranking system, and the time it takes to complete an SR are in need of review
- **Staff Morale Has Deteriorated:** Staff feel overworked, and undervalued (e.g. staff felt underappreciated during COVID-19 as they were working in the field enforcing COVID-related rules while other staff were able to work from home). In addition, there is a perceived inequity in the implementation of work-from-home policies among the staff. Coupled with a sense of insufficient recognition as staff are mandated to report in person for the full workweek

Process Maps & Processes

5 process maps were developed by the City. These included

- Enforcement and By-law Services Current State Process Map Callback Requests and Complaints
- Enforcement and By-law Services Current State Process Map Licensing
- Enforcement and By-law Services Current State Process Map Municipal Enforcement
- Enforcement and By-law Services Current State Process Map Property Standards
- Enforcement and By-law Services Current State Process Map Parking

The current state process maps demonstrate the differences in how SRs are received and assigned to EOs (more details are contained in the *electronic Appendix A file*). Highlighted differences include:

- Some are much more automated than others. Municipal is the most technology dependant and has fewer handoffs than Property Standards and Licensing
- Some SRs are dispatched from 311 to EOs others are not. Some are reviewed by a supervisor and/or a clerk while others are directly assigned to an EO using Amanda
- It appears that duplication exists in some of the steps and the use of a more automated/direct assignment should be adopted
- Online/Mobile SRs are sent directly to Enforcement & By-law Services
- Phone/Email/In-Person SRs are received by 311 before it is sent to the Enforcement Division
- SR for Property Standards are received by Enforcement Clerks and assigned to an Enforcement Officer (if the SR is life/health safety related it is assigned to a Supervisor)
- SRs for Licensing are received by Enforcement Clerks and assigned to a Supervisor for review who assigns it to an officer. There are some SRs that are sent directly to a Supervisor and bypass an Enforcement Clerk
- Mobile Licensing is assigned by dispatch over the radio from 7:00 am – 12:00 am
- Between 7:00 am to 11:59 pm Municipal SRs are dispatched by 311. From 12:00 am to 7:00 am, non-urgent SRs are created via the online 311 portal and mobile app and are self-assigned by officers (urgent calls are still dispatched by Security Services)

From the current state maps, there are a number of opportunities that could result in time savings, faster response rate, and reduction of error/missing information. These include:

- Eliminating the use of spreadsheets
- Improving/automating SR assignment
- Improved basic/required information gathering as many SRs are delayed/not followed up on due to the lack of required information
- Review the dispatching process to either eliminate or reduce when used
- Elimination of additional processing steps by various individuals (e.g. a review by the supervisor and/or clerk)
- Improved response time to customers (e.g. reduced use of mail)
- Improved management of customer expectation through the establishment of service response levels and understanding of priority designations
- Improve self-serve for customers to understand status

There are a number of limitations in the current processes that add to the time it takes to assign and/or respond to customers. These include:

- Limited 311 access to SR real-time information. 311 can only view the status of an SR once assigned to the Enforcement Division. As they have a restricted view of the SR they are not able to provide any additional information to a customer that a customer can obtain on their own if they choose to. In the past, 311 had access to the “notes” section of the SRs, however, there was an issue of confidentiality/protected information, and as such, their access to information was limited

- Councillors are not able to check the status of SR that customers are calling about to be able to inform the customer. Access to the SR status through CRM (provided that the customer has provided councillors with appropriate permission) would allow pertinent information to be communicated to the customer in accordance with privacy regulations, and possibly avoid an escalation to Enforcement.
- Customers can only view their own SR if they sign up, not on demand. This increases calls to 311 to enquire about SR status. If 311 cannot provide full information on status, this increases callbacks. Ensuring easier access to SR information will allow customers to self serve

Standard Operating Procedures (SOPs)

The current SOPs are outdated and it is not clear if they are being used. A project to review and update the SOPs was completed in 2022. A total of 73 SOPs were updated or created where required. However, only 16 of these have been reviewed and approved. The remaining are still pending review. The newly created Enforcement and Service Delivery Committees will be tasked with reviewing the SOPs relevant to their areas and ensuring they are updated and embrace best practices. Once confirmed, these SOPs will first be made available to City Councillors and then the public at large.

Data & Information

Detailed data and information gathering were conducted to complete the review. The analysis of the current state relied on the data provided by the Enforcement Division and 311. This data was used to understand the environment, staffing levels, the volume of work and the areas most affecting the ability to provide full quality services. In cases where data has been provided from the CRM and Amanda system, it should be reliable. However, some of the data requested was not available or was estimated (such as the number of complaints, escalations, and time to handle specific SR). An overview of the data/information is summarized as follows.

Data and Information Summary

- The majority of SRs for the Enforcement Division are in the area of Municipal (83%)
- 4 SR parking subtypes represent 68% of the total SRs for the Enforcement Division
- None of the 4 SR parking subtypes are designated a level 1 priority (3 of the 4 SR subtypes are designated a priority 3)
- Over 50% of the 74,676 parking SRs are closed and not attended to
- 63% of all Callback requests are for Municipal
- 42% of all Callback requests are for Parking
- Although data is not available, from the interviews and focus groups, the majority of Councillor requests are in the area of Municipal
- The highest reason a request for a Callback is a lack of information, not receiving a Callback once requested, and/or lack of action taken on an SR
- 51% of all SRs are completed either through mobile/web, indicating a high take-up rate for “self serve”. The phone channel is also used 42% of the time
- SRs are increasing over 20% each year over the past several years
- FTE levels have not increased to keep up with SR demand over the past few years. A net decrease in FTEs has occurred in 2023 over 2022
- There is a high rate of days away significantly impacting the number of hours available to conduct enforcement

The 3 areas related to the review (Property Standards, Licensing, and Municipal) are very different in not only what they enforce, but also their work schedules and processes. The following provides a more detailed overview of the 3 areas, operating practices, their volume of work, and management of the work, specifically:

- Hours of Operation
- Service Request Profile
- Service Expectations
- SR Volume and Trends
- EO Staffing and Workforce Management

Hours of Operation

Property Standards

- Monday to Friday 8:30 am to 4:30 pm
- Wednesday and Thursday 8:30 am to 8:00 pm

Licensing

- Sunday to Sunday 7:00 am to 12:00 am

Municipal Enforcement

- Sunday to Sunday 24 hours (rotating days/nights with no afternoon shifts)
- Dispatch/311 Sunday to Sunday 7:00 am to 11:59 pm. Note: Service Optimization started July 17, 2023 to optimize services for efficiencies during the hours of 12:00 am and 7:00 am, whereby only urgent calls received by phone are dispatched by Security Services (e.g. blocked driveway and internal snow clearing). Residents are directed to submit all other non-urgent service requests through the 311 portal, mobile app or email between 12:00 am and 7:00 am.

Service Request Profile

Peak periods refer to the time of the day and month of the year with the highest incoming SR Volume. The following are peak periods for the Enforcement Division

- Property Standards: Highest SR volume occurs at 10:00 am, 11:00 am, and 3:00 pm (a total of about 4,700 SR during these times). The highest months for SRs are May, June, and July
- Licensing: Highest SR volume occurs at 4:00 pm, 5:00 pm, and 8:00 pm (a total of about 407 SR during these times). The highest months for SRs are May, June, and July
- Municipal: Highest SR volumes occur at 8:00 am, and 9:00 to 11 pm (a total of about 20,498 during these times). The highest months for SRs are March, August, September

Service Expectations (sometimes referred to as Service Levels) refers to what the customer can expect once the SR is created. This should be set by the Enforcement Division. Service expectations often include when the SR will be assigned and the estimated timeframe of when the SR will be investigated. It is not clear as to what Service Expectations exist and/or being monitored. The following have been provided, but there is ambiguity on who established these, if they are communicated to the customer, or if they are monitored and achieved.

- Property Standards: 311 advises the customer that it will take up to 7 days to assign to an Enforcement Officer unless the SR deals with a vital service or pool
- Licensing: do not have any established service expectations (see below for Callbacks)
- Municipal: do not have any established service expectations
- Callback requests: 311 advises the customer that it will be between 3 and 5 business days, depending on area

SR Volume and Trends

Enforcement SRs are increasing significantly. The table that follows shows the number of SRs in Amanda and CRM, the number of Callback requests, and the number of calls handled by 311 that are not passed onto Enforcement in the years 2021, 2022, and 2023. There is a significant increase in SR year over year and a major increase in Callback requests in 2022. At the same time, the total of information-only calls has significantly decreased in 2022 and continue to slightly decrease in 2023. It is reported that this is due to online /mobile service offerings and the transition to CRM and SharePoint. During the same timeframe there has not been a significant increase in EO FTEs, in 2023 there was a net decrease of 2 EO FTEs since 2021.

SR Volumes & Trends			
	2021	2022	2023
Total SRs (in Amanda)	72,399 (represents a 22% increase since 2020)	89,811 (represents a 24% increase since 2021)	109,402 (represents approximately a 22% increase since 2022 or approximately a 51% since 2021)
Total SRs (in CRM) Note: the number is higher in CRM as duplicate SRs can be created, however, most of these duplicates are corrected by Amanda by linking them to each other. This demonstrates a workload issue for 311 and that multiple people are calling for the same SR	83,947	105,044 (represents a 25% increase since 2021)	133,493 (represents a 27% increase since 2022 or a 59% increase since 2021)
Total Callback Requests (means when a customer is asking to speak to someone from Enforcement, also referred to as a "Complaint" but does not generate an SR)	1,153	5,609 (represents a 386% increase since 2021)	5,537 (represents a 1.3% decrease since 2022 or a 380% increase since 2021)
Total Information Only Calls (logged in CRM only. These calls are handled by 311 and no SR is created for Enforcement)	88,001	39,435 (represents a 55% decrease since 2021)	38,890 (represents a 1.4% decrease since 2021 or approximately a 56% decrease since 2021)
EO FTEs	83	85	81 (Note: reduction in staffing of -4 in 2023 due to the dissolution of the cannabis unit)

A breakdown of 2023 SRs by channel is provided in the following table. Note that this data is from CRM as it is not available in Amanda.

Distribution of SRs by Channel in CRM							
2023	Phone	Online	Mobile	Email	In Person	Dispatch	Total
Total CRM SRs	55,640	35,148	32,615	4,947	111	5,032	133,493

The table that follows illustrates that the 2023 highest volume of SRs is primarily from 4 SR subtypes. In particular, 72% of SR are parking-related within 4 subtypes. As parking is such a large area of concern, the table separates parking from Municipal.

SRs by Subtype							
Licensing 1,528 Total SRs With 33 Subtypes		Property Standards 17,577 Total SRs With 33 Subtypes		Municipal (without parking) 15,621 Total SRs With 37 Subtypes Note: duplicates may exist as they are not linked to an existing SR when received		Parking 74,676 Total SRs With 39 subtypes Note: all individual" new" SRs as no duplicates exist as these are added to an existing SR when received	
SR Subtype	#SR	SR Subtype	#SR	SR Subtype	#SR	SR Subtype	#SR
Short Term Rental	262	Refuse	4,235	Excessive Loud Music	5,770	3-hour	23,953
Tow	254	Excessive Growth	3,887	Fail to Remove Snow	1,747	2 am – 6 am	22,043
Auto Body Repair	185	Exterior Offences	2,461	Fireworks	1,657	Sidewalk	4,308
Proactive	160	Garbage Containers	1,513	Illegal Signs	1,478	Prohibited Area	3,829
861 (56%) SRs of the total SRs are within 4 subtypes.		12,096 (69%) SR of the total SRs are within 4 subtypes.		10,652 (68%) SR of total SRs are within 4 subtypes		54,133 (72%) SR of the total SRs are within 4 subtypes	
The remaining 667 SR of the total SRs are within 29 subtypes.		The remaining 5,481 SR of the total SRs are within 29 subtypes.		The remaining 4,969 SR of the total SRs are within 33 subtypes		The remaining 20,543 SR of the total SRs within 35 subtypes	
By way of summary:							
<ul style="list-style-type: none"> ▪ Parking represents 83% of SRs for Municipal (74,676 out of a total of 90,297) ▪ Municipal (with parking) represents 83% of the total SRs (90,297 SRs of a total of 109,402 SRs) 							

Municipal (including parking) uses a priority designation for SR (developed by Municipal). All SRs are assigned to EOs. All priority 1 SRs are attended to as much as possible, if they are not they are escalated to a supervisor for action. Priority 2 and 3 are often not attended to due to resourcing constraints. As the table below illustrates, none of the 4 subtypes that result in 72% of all parking-related SR are classified as priority 1. As such, this portion, although assigned to an EO, is not attended to and is subsequently closed. It was reported that, in 2023, at least 31,000 of the 74,676 Parking SRs were closed as they were not able to be attended to.

SR Priority Designation							
Licensing		Property		Municipal		Parking	
SR Subtype	Designated Priority	SR Subtype	Designated Priority	SR Subtype	Designated Priority	SR Subtype	Designated Priority
Short Term Rental	Do not use priority designation	Refuse	Do not use priority designation	Excessive Loud Music	1	3-hour	3
Tow	Do not use priority designation	Excessive Growth	Do not use priority designation	Fail to Remove Snow	1	2 am – 6 am	3
Auto Body Repair	Do not use priority designation	Exterior Offences	Do not use priority designation	Fireworks	1	Sidewalk	2
Proactive	Do not use priority designation	Garbage Containers	Do not use priority designation	Illegal Signs	3	Prohibited Area	3

The main reasons for Callback requests are illustrated in the table that follows. Municipal has the highest number of Callback requests representing 7,786 (63%) out of 12,340 requests. The main reason cited for the Callback is a request for more information about the action is taken/outcome as a result of continued offences and complaints about not receiving a Callback after the request. Similarly, lack of information, lack of resolution, and status update requests are the primary reasons for a request for Callback in Property Standards.

Callbacks	
Area/Volume	Main Reasons For Callback Request
Mobile Licensing Volume of 611	<ul style="list-style-type: none"> ▪ Due to unsuccessful attempts to reach the relevant Department and they do not receive a call back after leaving a voicemail (so of this is due to no contact information being provided by the customer) ▪ Complaints about delays in receiving Callbacks or updates on reported issues ▪ Other themes include: towing and licensing issues, general licensing and permit inquiries, vehicle inspection process concerns
Property Standards Volume of 3,943	<ul style="list-style-type: none"> ▪ Requesting the status of files ▪ Lack of resolution/action ▪ Closed no resolution or explanation
Municipal Volume of 2,564	<ul style="list-style-type: none"> ▪ Frequent Callback requests made for closed files with no explanation ▪ Frequent call-back requests made for inaction/continuing offense ▪ Customers requesting a Callback from the officer/supervisor for more information
Parking Volume of 5,222	<ul style="list-style-type: none"> ▪ Frequent Callback requests made for more information about action taken/outcome as a result of continued offences ▪ Complaints about not receiving a call-back after requested

EO Staffing and Workforce Management

- Based on the estimated inspection time required to handle the total number of service requests compared to the available inspection time for the complement of FTEs the Enforcement Division is significantly understaffed for the volume of SRs. This does not account for the number of required re-inspections for any given service request. However, the required data for accurately calculating FTE requirements does not currently exist because inspection time is not tracked. Examples of data requirements to accurately calculate total FTE (both FT and PT) include
 - The average length of time to complete an SR including any follow-up work
 - Average planned unavailable time to complete enforcement duties (e.g. staff meetings, vacation, lieu, assigned project work)
 - Average unplanned time to complete enforcement duties (e.g. sick, long/short term disability, emergency issues)
 - Total available time to complete enforcement duties (the number of hours and days a FTE works)
 - The arrival pattern of all SRs (e.g. the kind of SRs and the time of day they are created)

- In addition, to properly (most effectively/efficiently) manage EOs an automated workforce management tool is required. Currently, most of this type of workforce management is completed using Excel and is provided to 311 multiple times a day via email in order to dispatch SR accurately. This is a time-consuming and not an optimal method for workforce management. A workforce management tool allows accurate planning for how many EOs are required and available. When shortages occur, a plan to manage these can be developed. This allows for a more proactive way of managing the workforce (e.g. appropriately scheduling meetings in lower SR times, scheduling vacations due to operational needs, proactively managing possible days away, and understanding the impact of project work on SR management)
- Directly and critically impacting the required number of staff and the calculation of being significantly understaffed is the total days when EOs are not able to conduct enforcement activity. These are as follows (for 2023)
 - Municipal and Licensing 2,583 days (this includes vacation, sick, ST/LT disability, and leave of absence). This does not include hours spent on projects or meetings which also accumulate to hours/days not available to conduct enforcement activity
 - Property Standards 1,323 days (this includes vacation, sick, ST/LT disability, leave of absence, and union executive business days not in office). This does not include hours spent on projects or meetings which also accumulate to hours/days not available to conduct enforcement activity

The total number of days not available for enforcement activity is 3,906 days. If it is assumed that an average FTE has 240 available days to work, these numbers represent about 20 FTEs.

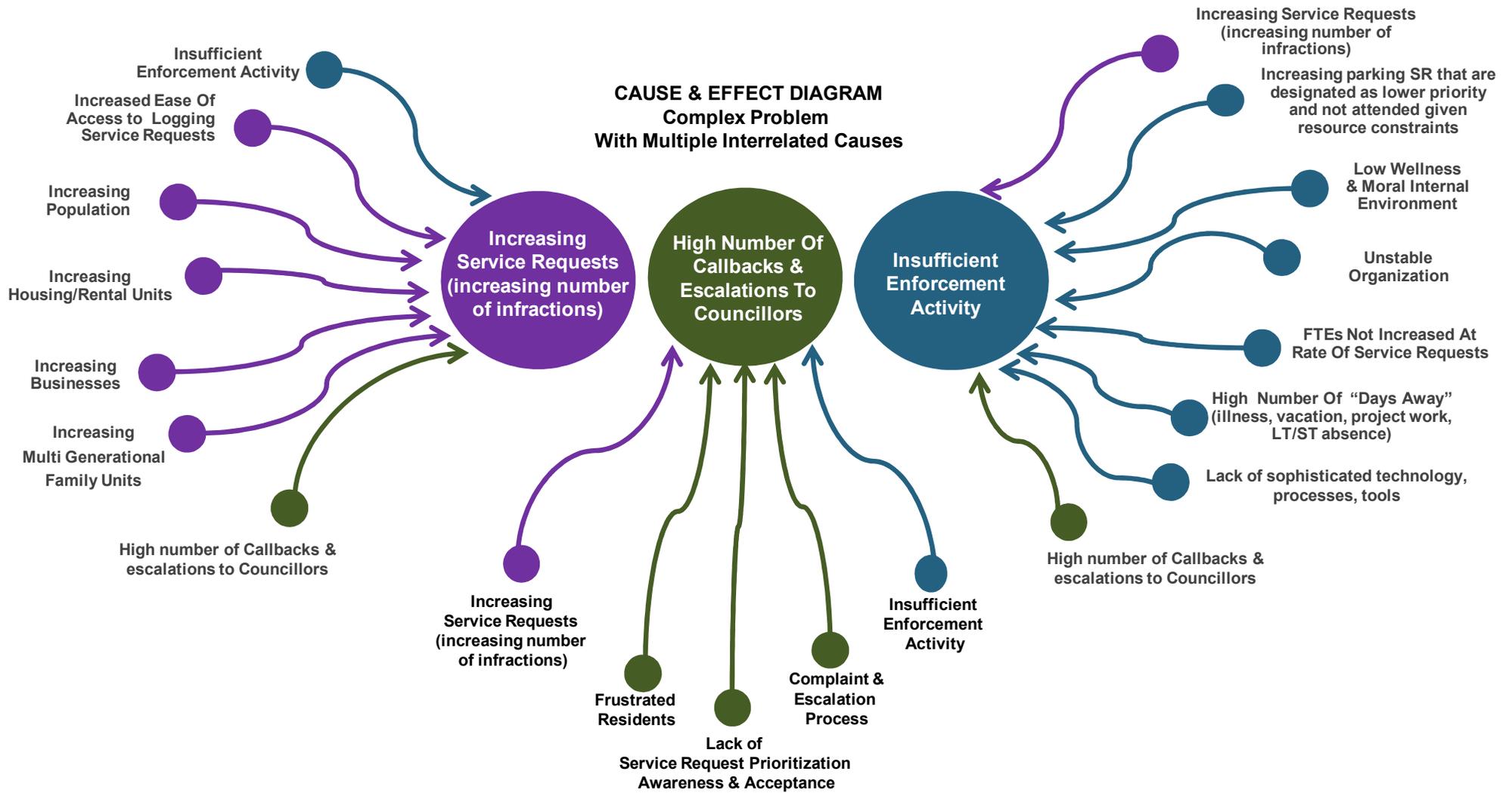
The Current Challenge

The current challenge can be grouped into 3 main components. Those being:

- Increasing Service Requests (which is a direct result of increasing infractions and/or assumed infractions)
- Insufficient enforcement activity
- High number of Callbacks and escalations to Councillors (as a result of the 2 previous bullets)

The solution may appear to be simple at first glance. Increase the number of EOs, which would result in more SRs being handled, which would subsequently decrease the number of Callbacks and escalations to Councillors. Although additional EOs are required to provide stability to the organization and allow for some improvements to be worked on without further reducing the time to enforce, continued increasing EOs is not sustainable without process improvements, investments in technology, improved linkages with 311 and enhanced relationships with both Council and the community. The current challenge, although on the face has 3 main components, each component has a number of impacting factors that together result in a complex challenge facing the Enforcement Division and the City.

The review resulted in the understanding that the current challenge is very complex and the cause is both multidimensional and multifaceted. The diagram that follows illustrates our findings. The diagram that follows, shows the route causes for each of the 3 main components (increasing SRs, high number of Callbacks and escalations to Councillors, and insufficient enforcement activity) and also shows that each main component impacts each other, resulting in a highly complex problem.

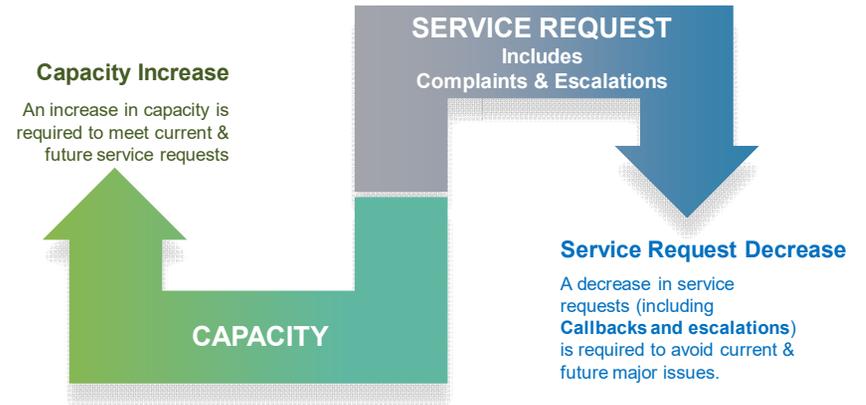


However complex the current challenge is, the solution can be grouped into 2 critical requirements. The solution requires the City to increase enforcement capacity (by increasing **the time** to enforce, not simply increasing FTEs) while **also** decreasing service requests. This relationship is critical and is represented in the diagram to the right. Increasing capacity by adding FTEs may address the issues in the very short term, but will not provide a sustainable solution.

In order to tackle these 2 critical requirements, actions taken must result in

- Improvements to the Culture
- The addition of further advancements such as technology
- The evaluation and re-engineering of processes, rules (e.g. by-laws), and techniques

These are discussed in detail in the next section, **Recommendations**.



Recommendations

The City would benefit from a more holistic, proactive, teaching approach as to why by-laws and compliance are necessary components for a safe, healthy community and to maintain the quality of the City must be adopted. In an ideal world, enforcement activities would be a last resort, however, that is not the current reality. A number of enforcement or safety organizations are moving to a more proactive, engaged community-based approach. In this model, the desired outcome is one where the community understands and buys into the need for by-laws and sees these as positively and absolutely required for the overall good. As such, they will more willingly comply and much fewer infractions/violations will occur.

The current problem facing the City of Brampton Enforcement Division is a systemic problem that has resulted from an accumulation of components over the past number of years. Changes in legislation, regulations, downloading to municipalities from the Province, longer-term planning and policy development, inadequate funding of staff and technology and COVID have all played major roles, cumulating to the current problem of the number of SRs (including Callbacks and escalations) has drastically outnumbered the ability of the Enforcement Division to respond appropriately to all the demands.

A holistic longer-term vision for enforcement results in the proactively co-ordinated policy and procedures, technology, City wide planning, and implementation of new changes. This results in a compliance-based community that is working together to ensure safety, well-being, and a quality City. However, this long-term vision requires substantial support, change management, and time. More specifically it requires:

- Increased trust and engagement between customers and the City
- Increased trust and engagement between Council and the Enforcement Division where Council understands the work enforcement is doing and that it will take time to for positive results to be seen
- Change management internally – improved morale, wellness, culture shift
- Long-term external policy/by-law changes to encourage builders, businesses, and residents to make the city safer, with fewer infractions
- A desire for change by City administration and Council
- Patience and a long-term implementation plan that is managed and accounted for ... One which allows for individual changes and improvements to accumulate into longer-term success

The current model in the City mainly operates as a reactive complaints-based model. This type of model is not sustainable given the complexity of why SRs are increasing and why the time to enforce is decreasing. In 2023, Council directed staff to implement a proactive property standards enforcement pilot, however, the results of this pilot are yet not available. With the current staffing complement and a significant reduction in time to enforce (e.g. days away), proactive enforcement would be at the additional expense of current SRs resolution. A balanced approach is necessary and an acknowledgment that there will be slippage in reactive enforcement before the benefits of a proactive model can be realized. However, some proactive enforcement activity could begin in the short term to realize quick efficiency benefits while also addressing the frustration levels of customers.

A longer term vision should be adopted and worked towards, as the desired end state for enforcement in the City.

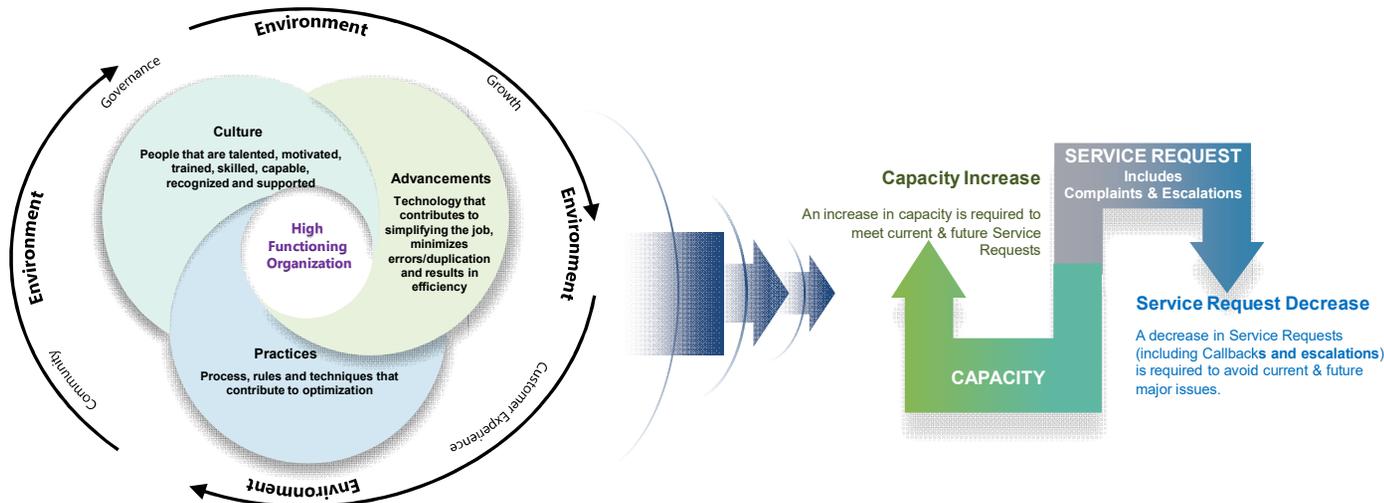
Increasing Capacity While Decreasing Service Requests

Based on the findings of this review, there are 3 drivers required to move the Enforcement Division to a high-functioning organization. These are:

- **Advancements:** This includes technology that contributes to simplifying the job, minimizing errors and duplication, and results in efficiency
- **Practices:** This includes updating processes, rules, and techniques that are outdated, not being adhered to, or eliminating cumbersome time-consuming steps
- **Culture:** This includes focusing on people and how they are supported, organized, and motivated.

High Functioning Organization:
An organization (or sub unit of a bigger entity) that delivers quality services, have highly motivated and capable staff, has stability, and one that is trusted.

The diagram that follows demonstrates the relationship between these 3 drivers. In addition, the current environment is a key influencer and highly impacts success. The environment is made up of things that significantly impact the ability to perform well. The environment considers elements such as **Growth** (population, infrastructure, housing, business), **Customer Experience** (what customers want, their experiences with other organizations/businesses, their expectations around speed, accuracy, and quality of service), **Community** (how involved the community is, the level of trust and engagement they have with the City and their tolerance levels) and **Governance** (how decisions are made, relationship/interactions within the City, legislation, regulations, governing policies, by-laws and budget approvals/direction).



Specific Recommendations

The following recommendations are categorized into the 3 primary drivers for a high-functioning organization (Advancements, Practices, Culture). There is no quick fix to the issues facing the Enforcement Division. A multi-prong approach is required to make a significant impact. Although the scope of this review did not include calculating the number of FTEs required, an increase to EOs is required to stabilize the organization and to be in a position to begin implementation of the recommendations. In total, there are 28 recommendations, 16 in the area of Advancements, 5 in the area of Practices, and 7 in the area of Culture.

ADVANCEMENTS	
Recommendation	Impact
<p><i>Improve Quick Access To Heatmaps:</i> Ensure easy access to regular (on demand) heatmaps. Investigate automating this in CRM/Amanda.</p>	<ul style="list-style-type: none"> ▪ Allows for proactive enforcement ▪ Allows for distribution of EO to most required areas ▪ Increases data/knowledge on what does or doesn't work and allows for improved management activities ▪ Allows for real time SR management
<p><i>Implement An Automatic Distribution For SR:</i> Investigate Computer-Aided Dispatch/ CAD Systems that integrate dispatch/mapping with GPS to replace the current radio and dispatch process.</p> <p>The current overnight SR self-assignment process should be evaluated and expanded to daytime if appropriate.</p> <p>As an additional short-term solution, establish dedicated enforcement dispatch staff with subject matter knowledge to check SR required information before being dispatched and filter SR to correct staff in the most efficient manner.</p>	<ul style="list-style-type: none"> ▪ Improves accuracy of SR assignment ▪ Ensures fairness and equity of assigned SR ▪ Increases EO safety ▪ Reduces the need for manual/paper/excel drive SR assignment ▪ May increase the ability of EO to complete multiple SRs in the same area ▪ Increases efficiency and time to dispatch ▪ Eliminates SR review prior to being dispatched in most cases

ADVANCEMENTS

Recommendation	Impact
<p><i>Continue To Implement The Auto Key Distribution (AKD):</i> Ensure that the current project to implement Auto Key Distribution for cars continues. This allows for a “universal car” or “one fleet” model. Note: this recommendation assumes a “business case” was completed for the AKD and demonstrated value.</p>	<ul style="list-style-type: none"> ▪ More equitable model in terms of who has access to better-equipped cars ▪ May improve fleet management (predictive wear and tear on cars making it easier to service and replace) ▪ Provides an opportunity to reduce the need to start a day/shift in particular locations ▪ May decrease travel time at to start and end of day, which increases time to enforce
<p><i>Determine An Improved Approach To Parking:</i> Investigate innovative options for creating additional parking (some of the options could include various models of on-street parking, designated on-street parking zones, increased days for parking permits, and community-based parking areas). Conduct a best practice search across other enforcement organizations to determine possible solutions.</p>	<ul style="list-style-type: none"> ▪ Decrease in SRs ▪ Increase in compliance with by-laws ▪ Increases capacity to complete additional SRs ▪ Decreases complaints, escalations, and number of Callback requests ▪ Increases morale ▪ Improves frustration levels of customers
<p><i>Expand Automatic License Plate Readers (ALPR):</i> ALPR should be used to conduct proactive parking enforcement with possible dedicated shifts and/or EOs. Using heatmaps, trends in SR determine when and how ALPR can be used most efficiently. Equip additional cars with ALPR to eventually complete all parking enforcement using this technology. This technology investment should only be explored in conjunction with any changes to the current parking by-laws (e.g. if the three hour parking rule is eliminated, this investment may not be as valuable).</p>	<ul style="list-style-type: none"> ▪ Reduce time to ticket ▪ Increases the number of SR completion ▪ Increases accuracy ▪ Increases safety ▪ Adds time to enforce resulting in increased SR completion
<p><i>Review High Volume Callbacks And By-laws:</i> Evaluate where changes to by-laws, procedures, policies, and regulations can result in a more productive and positive solution and assist in compliance and enforcement (e.g. public nuisance, garbage bin storage). In addition, review prohibitions and enforcement processes that are currently not resulting in the desired outcomes/compliance (e.g. weekend party and nuisance complaints).</p>	<ul style="list-style-type: none"> ▪ Increases efficiency and effectiveness ▪ Reduces “closed” SR that are not attended to ▪ Improves trust and engagement of customers where by-laws, procedures, and policies are viewed as unrealistic ▪ Reduces the number of SRs ▪ Increases enforcement capacity

ADVANCEMENTS

Recommendation	Impact
<p><i>Procure A Custom Mobile Solution:</i> The current process for in-field notes/photos/access to information and uploading is cumbersome with poor connectivity at times and multiple devices, adding significantly to the time requires to complete an SR. A mobile solution that accesses Amanda data allowing officers to take photos and notes in the field , to eliminate transferring information and data between devices and providing better customer service with access to data. To accompany this, appropriate supporting field technology is required (e.g. mobile phones that support full use or tablets).</p> <p>Work on procuring a new mobile (phone) application is underway in the Building Division. The Enforcement Division should be part of a possible overall solution, as the business needs are very similar.</p>	<ul style="list-style-type: none"> ▪ Increases efficiency ▪ Reduces time spent on a SR ▪ Increases time spent in the field and reduces time in the office at the start and end of the day ▪ Reduces the possibility of human errors
<p><i>Investigate Outsourcing Parking Enforcement:</i> Evaluate cost-benefit model and ability to implement. Review areas where a form of outsourcing currently is being done to assist in the evaluation (e.g. plaza/private property parking). Conduct research into what cities are outsourcing currently and their evaluation of it.</p> <p>If this option is not viable, establish a dedicated parking unit, separated from Municipal to action parking service requests. This isolates the main issue facing enforcement currently and allows for a more dedicated, targeted solution-focused approach.</p>	<ul style="list-style-type: none"> ▪ Most impactful recommendation on capacity to complete other SR ▪ Immediately increases the effectiveness of parking enforcement once implemented ▪ Significantly reduces SR for Enforcement to attend to ▪ Increases ability to effectively enforce ▪ Increases satisfaction of customers ▪ Reduces complaints, escalation and Callbacks ▪ Easier accountability and cost model (built into contract) ▪ May result in long-term savings

ADVANCEMENTS

Recommendation	Impact
<p><i>Improve CRM/Amanda:</i></p> <ul style="list-style-type: none"> ▪ Ensure email & phone number a required field in CRM ▪ Implement contact validation to accurately capture customer information and to enable EOs/311 to provide customer updates ▪ Enable officers to input updates easily to CRM when in the field ▪ Enable residents and councilors to query a service request status with the COBI number online. Review process for call-backs to decrease hand-offs and lead time ▪ Increase information provided to customers during stages of the complaint resolution process through CRM or Service Brampton (i.e. order issued, clean up performed, etc.) 	<ul style="list-style-type: none"> ▪ Increases customer ability to self-educate on SR status ▪ Decreases requests for Callbacks, escalations, and complaints ▪ Minimizes/avoids multiple handoffs (311 can do more or the customer can contact the EO supervisor directly) ▪ Improves reputation of enforcement activities in the community (they can see progress and understand delays) ▪ Improves 311 ability to respond to customer inquiries on SRs
<p><i>Evaluate Escalation Process:</i> Evaluate the current escalation practice of using email. Use the CRM system to flag an issue that is directed to the Director of Enforcement. In addition, investigate if Councillors can access a specific customer's SR if permission (e.g. through a waiver) is provided to them by the customer. Reviewing SR status and noting areas may avoid an escalation to the Enforcement Division.</p>	<ul style="list-style-type: none"> ▪ Ensure fairness and equity within the SR queue by not reprioritizing service requests that have been designated as lower priority to a higher priority ▪ Escalations can be better coordinated and resolved. Improved tracking of data used to investigate trends and possible “hot spots” which can be proactively managed ▪ Frees up Manager/Supervisor and Enforcement Officer time to continue to manage the SR Queue

ADVANCEMENTS

Recommendation	Impact
<p><i>Affirm Priority Designations:</i> Evaluate the current SR priority ranking system. If appropriate, reaffirm the use of priority designations. Once affirmed, educate on priority designations. Ensure all priority designations have an estimated service response level. Provide education so that customers, Councillors, and staff understand priority levels and estimated response time.</p> <p>Determine how to continue to enforce lower priority SRs, such as proactively blitz, and attend to specific areas at regular intervals (e.g. on a specific day of the week).</p> <p>Asses Amanda/CSR SR Codes/Messages. In September 2023, the CRM status messaging was enhanced to provide a more detailed explanation of how an SR was handled and why it was closed. Evaluate if these new codes are assisting in reducing the number of complaints/escalations by customers. Review if more specific coding is required for lower-priority SRs.</p>	<ul style="list-style-type: none"> ▪ Focuses available enforcement capacity on safety and health SR (these are designated as highest priority (#1)) ▪ Assist in managing customer expectations ▪ Should result in a significant reduction in escalations by Council on lower priority SR (there is an agreement that these may not be enforced in real-time as they are received) ▪ Appropriate responses can be provided (by 311, Councillors, and enforcement staff) if a customer escalates a lower-priority SR
<p><i>Evaluate 311 Support:</i> Provide expanded access to Amanda notes section so that 311 can provide additional information to customers (note: provide instruction/training on what not to disclose). Consider what other tasks 311 can do on behalf of the Enforcement Division that result in increased capacity of enforcement to attend to SRs.</p>	<ul style="list-style-type: none"> ▪ Improved customer service at the point of contact ▪ Reduced Callback requests, escalations and complaints
<p><i>Begin to Implement Small Scale Proactive EO Enforcement Process:</i> Provide EOs direction to create an SR if the officer is in an area to attend to an SR.</p> <p>Implement SR blitzes and hot spot proactive enforcement activity.</p>	<ul style="list-style-type: none"> ▪ Proactive Approach to Enforcement ▪ Faster response time for some SR ▪ Positively impacts the reputation of EO in the community

ADVANCEMENTS

Recommendation	Impact
<p><i>Investigate Enhanced Automated Scheduling Tools:</i> An automated staff scheduler that assists with the distribution of EO, planned absentees, and staff peaks and valleys accordingly should be evaluated. In addition, 311 can access the schedule and better understand availability. The current process of using Excel and email to communicate schedules can then be eliminated.</p>	<ul style="list-style-type: none"> ▪ Improves management capabilities to appropriately schedule staff ▪ Eliminates manual processes using Excel to schedule and increases management staff time ▪ Improves 311 understanding of availability ▪ Provides more accurate data for staffing requirements overall and in peaks and valleys ▪ May positively impact the number of SR completed as peak times can be more proactively planned for
<p><i>Invest In Drones:</i> Investigate the effectiveness and efficiency of using drones to proactively conduct enforcement. Conduct research as to where Drones are being used successfully.</p> <p>Pilot in high areas of risk or complete a blitz. Drones may also be used to flag non-compliant vehicles and alert EO who can then proceed to the area.</p>	<ul style="list-style-type: none"> ▪ Increased enforcement activity ▪ Increases time of EO to complete SRs ▪ Provides “real-time data” in higher-risk areas or highly non compliant areas ▪ Improves overall efficiency and effectiveness of enforcement ▪ Reduces time wasted attending SR that are no longer viable (e.g. parked car is no longer there)
<p><i>Include in the longer term strategy an evaluation of Multiple Detachments/Satellite Offices.</i> Travel time to and from locations can significantly reduce the time available to enforce. Assuming on average, 30 minutes to cross the City to begin to enforce results in up to hours a day for each EO that requires this type of travel resulting in a reduced capacity to enforce. Consider unconventional satellite offices (e.g. community centers, other government offices, other city offices, quadrants/areas/zones) instead of East and West. The evaluation of this model should take into account the impacts on a one fleet model that provides economies of scale and the value of having all EOs located together, while balancing this with increased time to enforce and a more community based approach to enforcement.</p>	<ul style="list-style-type: none"> ▪ Substantially increases time to enforce ▪ Assist in EO health and wellness by reducing travel time ▪ Allows for faster time to react (enforcement on timed SRs can begin immediately at the start of a shift) ▪ Introduces a more community based model of enforcement

PRACTICES

Recommendation	Impact
<p><i>Process Improve:</i> Review process maps and implement improvement opportunities. Focus on opportunities that:</p> <ul style="list-style-type: none"> ▪ Standardize process across the Division ▪ Eliminating the use of manual processes and spreadsheets ▪ Automate SR assignment ▪ Improve basic/required information gathering ▪ Improve the dispatching process ▪ Elimination of extra steps in the review process (e.g. a review by the supervisor and/or clerk) ▪ Improve response time to customers (e.g. reduced use of mail and handoffs between departments/divisions) ▪ Improve management of customer expectation through the establishment of service response levels and understanding of priority designations ▪ Improve self-serve for customers to understand what action is being taken and/or why action is not being taken 	<ul style="list-style-type: none"> ▪ Increases efficiency and effectiveness ▪ Increases speed of SR assignment ▪ Increases enforcement capacity
<p><i>Provide/Enhance Training:</i> Determine what type of training is required and requested and once provided evaluate the effectiveness of training. Utilize various methods of training to ensure minimal impact on available staff and possibly allow virtual training while working from home. More specifically, develop a consistent and effective onboarding training model and provide regular real-time/seasonal training where required.</p>	<ul style="list-style-type: none"> ▪ Improves staff ability and capability ▪ Increases staff competency ▪ Increases accuracy of work ▪ Increases staff confidence ▪ Increases effectiveness and efficiency of EOs ▪ Impacts positively on EOs in particular new/recently hired EOs
<p><i>Review Municipal Shift Schedules:</i> Currently there is no overlap between shifts and this contributes to backlogs in SR. Determine if the current shift schedule is efficient and consider changes to the schedule (e.g. adding an afternoon shift), evaluate reducing the overnight shift with on-call availability for emergency SRs. To assist in the evaluation review of SR arrival trends (time of day, day of week).</p>	<ul style="list-style-type: none"> ▪ Reduces backlog in SR ▪ Reduces “closed” SR without action ▪ Increases enforcement when most required ▪ Increases efficiency and effectiveness of shifts

PRACTICES

Recommendation	Impact
<p><i>Evaluate Benefits Of Tiered Staffing Model:</i> Evaluate the viability of establishing junior, mid, and senior EO positions to execute various SRs. Junior positions would have fewer requirements as they would be considered entry-level responding to minor violations. As junior EOs are trained and gain experience they can apply for mid positions who respond to more complex violations. This will increase the pool of available candidates, and make it easier/faster to hire and train. Students are currently used to executing specific SRs in the summer and this has been reported as being very effective. A pool of junior EOs could be established for PT/on-call work when SRs are escalating, to complete targeted blitzes or to backfill for EO days away.</p>	<ul style="list-style-type: none"> ▪ Increases capacity to complete SRs ▪ Increases enforcement capacity ▪ Minimizes risk and impact of high days off ▪ Assist in succession planning ▪ Allows for proactive enforcement activity without significant drain on EO capacity ▪ Reduces FTE budget requirements
<p><i>Establish Building and Zoning Investigation Unit(s):</i> Evaluate the benefits of re-establishing a Building Code enforcement unit/task force within the Building Inspection Services unit and establish a similar model for Zoning Services to execute enforcement-related zoning reviews. As of this review, approximately 600-800 zoning files are awaiting the follow-up.</p>	<ul style="list-style-type: none"> ▪ Reduce time to complete SR ▪ Closter match of enforcement specialists and policy specialists ▪ Improved customer service

CULTURE

Recommendation	Impact
<p><i>Focus on Staff Morale:</i> A high percentage of staff feel undervalued and this is causing low morale. Regular wellness check-ins to determine what staff require to feel supported and valued should be conducted. COVID significantly impacted staff morale. The current City work at home policy also impacts staff morale as the majority of enforcement staff cannot take advantage of this policy and feel they have not been acknowledged for this. The Enforcement Division management should work with others in the City and Council where needed to focus on staff wellness. In addition, increased involvement of staff in problem-solving should be implemented.</p> <p>Determine how staff would like to be engaged and in what areas. Ensure a 360-degree feedback loop once engaged.</p> <p>Note: The culture may improve now that the Division is mostly stabilized with the new permanent Commissioner, Director some of the managers, and supervisors.</p>	<ul style="list-style-type: none"> ▪ An increase in staff morale results in an improved culture and staff feeling acknowledged and supported, which can increase motivation at work ▪ Improvement to staff morale and wellness, contributes positively to teamwork, the customer experience and internal customer relationships ▪ May positively impact and reduce the rate of absenteeism ▪ As staff are more fully engaged, this will increase trust ▪ Moves towards a solution-focused team
<p><i>Develop an Enforcement Long-Term Strategy:</i> The challenge that faces the Enforcement Division requires a long-term multi-pronged solution. A longer-term strategy is required ...one that establishes a vision, purpose, and desired outcome. Included in the Strategy should be a review of:</p> <ul style="list-style-type: none"> ▪ How to move towards a proactive service delivery model ▪ The organization, determining the best fit for the Enforcement Division in the City organizational structure if a proactive model is to be adopted ▪ How to better organize and allocate resources ▪ The requirements to achieve long-term success 	<ul style="list-style-type: none"> ▪ Alignment of Council, staff, customers ▪ A year-over-year implementation plan to achieve the vision ▪ An understanding of where the Division is heading ▪ An improved use of resources

CULTURE

Recommendation	Impact
<p>Evaluate Attendance Management Program (AMP): Review the AMP taking into consideration the health impacts of shift work and the inability to work from home when slightly under the weather as other City staff do. Although the rule is to take a sick day when you are not able to work, in practice, some staff work from home when they are still able to work, but not travel to the office. This is not possible for EOs.</p>	<ul style="list-style-type: none"> ▪ Recognition of staff who are required to work differently assists in increasing morale ▪ Recognizing the impacts of shift work and little access to work from home programs positively impacts morale ▪ May highlight changes to the AMP to accommodate the impacts of shift work, which may reduce the rate of absenteeism
<p>Address Unavailability of EOs: A detailed review of the cause of unavailable staff is required. The high rate of unavailable EO time has a significant impact on the ability to complete SRs and on the morale of those who are available. Unavailability is comprised of vacation, earned time off, sick days, long/short term absences, and participating in project work and the union. The recommendation is not intended to reduce appropriate time away but to ensure appropriate time away and to determine an approach that minimizes the impact.</p> <p>The detailed review should explore and evaluate alternative methods to mitigate the risk of unavailability such as developing a pool of past-trained staff (e.g. summer students, part-time staff, and retired persons within the community with a background in enforcement).</p>	<ul style="list-style-type: none"> ▪ Increase availability of EO ▪ Increase completion of SRs ▪ Positive impact on morale ▪ Improved management of EOs
<p>Implement Revised/New SOPs: Finalize/approve outstanding revised/new SOPs and ensure adherence to these. SOPs were updated in 2022 and have not been implemented. A priority should be to approve these, train where necessary, and implement them. Once implemented, adherence to the SOPs should be monitored.</p> <p>Review possible additions to SOPs to direct officers to contact the customer with resolution activity and require supervisors to be on the road and review service requests.</p>	<ul style="list-style-type: none"> ▪ Improves accountability ▪ Improves communication with customers ▪ Increases satisfaction of customers ▪ Reduces complaints, escalation and Callbacks ▪ Allows supervisors to understand improvement requirements firsthand ▪ Increases communication between enforcement management and EOs ▪ Increases morale and adds to a supportive work environment

CULTURE

Recommendation	Impact
<p><i>Determine Staffing Requirement:</i> Using an appropriate staffing calculator, determine overall staffing requirements, full-time/part-time mix and the number of FTEs required at peak and valley intervals to accurately calculate staffing requirements investigate:</p> <ul style="list-style-type: none"> ▪ Average length of time to attend to highest volume SR investigations ▪ SR peaks and valleys (volume of SR on specific time of day, days of the week, months) ▪ Staff “time off” (include all time away from enforcement actions) 	<ul style="list-style-type: none"> ▪ Results in an understanding of how many FTEs (FT/PT mix) is the optimal number required ▪ If staffing increases are required and acknowledged, but due to budget constraints cannot be met, models to minimize the staff shortage gap can be developed and more readily accepted ▪ If the current FTE complement is sufficient, brings an acceptance that overall enforcement practices require different approaches
<p><i>Ensure Accountability:</i> Establish realistic response time service levels for all SR types and priority levels. Also, establish service expectations for EOs. Once established, monitor and adjust if necessary.</p>	<ul style="list-style-type: none"> ▪ Open communication (external and internal) on what are reasonable expectations and what the processes are to support work ▪ Improves management of EOs ▪ Improves management of SRs and may increase completion of SRs ▪ Positive impact on morale ▪ Improves ability to onboard and train ▪ May decrease the number of complaints/escalations ▪ Ensures fairness and equity among staff ▪ Helps to communicate effectively with the public (both in 311 and EOs) ▪ Provides a baseline to determine future requirements

Implementation

The following are suggestions for implementation and moving forward:

- Approve a dedicated implementation project manager who will in turn determine what is needed from a staffing and budget perspective
- Design a 3-phase implementation plan. Report-back progress to Council every quarter
- Focus the implementation plan on easy to implement, high impact recommendations for Phase 1 in order to provide some relief
- Advise Council on recommendations that require additional budget considerations or major changes in by-laws, policy, or procedure
- Ensure Council and staff work cooperatively together to allow for implemented changes to take effect and realize benefits

Final Point of View

As a final note, we would be remiss not to include the following points which can have a significant impact on success.

- A holistic long-term vision and solution are required to sustain positive change. Enforcement cannot be the sole solution in isolation of other influencing factors that impact the demand on enforcement. EOs will most likely never be able to keep up with demands unless additional changes occur
- Only recently has the organization stabilized. With the addition of the permanent Commissioner and Director, positive impacts should occur in the Enforcement Division. Changes have already begun. Examples of these changes include:
 - **More comprehensive information is being provided to the customer:** An increased in the level of detail provided when callbacks are requested. Responses are now to include what specific action was taken (e.g. warn or issue a violation) or an explanation as to why no enforcement action was taken (e.g. owner appropriately obtained a parking permit). As much information as possible will be provided, without a FOI breach
 - **Improved communications with EOs:** A regular practice of the Director visiting each work group, including the night shift teams, has begun. The intent of these visits is to improve communication with EOs. Information is provided that otherwise EOs may not easily be exposed to. In addition, EO questions are answered and a positive environment is being focused on by reinforcing that EOs are appreciated and are a valuable part of what makes the community work
 - **New committees to implement change:** New committees have been established to begin to address the culture and work environment. The committees include:
 - Enforcement and Service Delivery Committee
 - Vehicle Users Committee
 - 311 Working Group
- There are several other corporate initiatives underway that may advance the Enforcement Division, including the CX Strategy and Action Plan and an Internal Audit of Property Standards. These should be supported and monitored to ensure a positive impact, and alignment with implementation initiatives. These include establishing training committees, reviewing technology upgrades and building on internal continuous improvement, and digital innovation working groups
- The Customer Experience Strategy Project being led by Organizational Performance can provide valuable external information and data on what customers actually expect and where their points of pain exist. This can be used to develop service expectations, training, and education material
- The recently approved Brampton Parking Plan should bring a positive impact to the Enforcement Division. Alignment with the Division and the Plan is critical
- The Division should adopt a leading not lagging approach to metrics and workload management moving towards acquiring data and information to assist in a move to a more proactive approach to enforcement and an improved managed enforcement activity environment with additional data
- Council support and commitment to continue working with the Enforcement Division to implement changes. The recent approval of additional staff demonstrates an early commitment to working with the Enforcement Division to work towards a solution