



## **CITY OF VICTORIA** **Review of Bylaw and** **Licensing Services Division**

### **Distribution:**

City of Victoria

Jason Johnson, City Manager  
Jocelyn Jenkyns, Deputy City Manager  
Susanne Thompson, Director of Finance  
Rob Woodland, Director, Legislative & Regulatory Services  
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### **EXECUTIVE SUMMARY**

July 14, 2015

The City of Vancouver's Internal Audit Division was engaged by the City of Victoria Finance Department to conduct a value-added audit of the City of Victoria's Bylaw and Licensing Services Division (Bylaw Office). The objective of the audit is to assist City of Victoria management with improving the efficiency and effectiveness of the Bylaw Office and aligning the enforcement approach with Council's expectations for customer service and risk mitigation.

There is an opportunity to position the City of Victoria's Bylaw and Licensing Services Division as a more customer-focused service provider in bylaw enforcement. Defining and communicating the Bylaw Office's mandate, strengthening management oversight, and establishing performance targets would enhance the efficiency and effectiveness of the division. Audit findings and recommendations in this report are categorized as follows: 1) Strategy / Direction, 2) Customer Service Focus, 3) Operational Issues.

The more significant findings and recommendations are:

#### **F.1 Define and communicate the Bylaw Office's mandate**

Having a clearly defined and communicated mission and mandate would assist with aligning the Bylaw Office's activities, provide direction for staff's efforts, and enable better decision-making. The Director of Legislative and Regulatory Services will position the Bylaw Office to ensure alignment with the City's overall strategy and focus.

#### **F.3 Enhance management oversight of the Bylaw Office function**

Review of current practices in the Bylaw Office revealed an opportunity for improvement in: case file review, prioritization of work, and performance management. The Director, Legislative and Regulatory Services will ensure that the role of the new Manager, Bylaw and Licensing Services includes responsibility for oversight in the above-mentioned areas.

#### **F.4 Establish metrics to measure and drive performance**

Current performance metrics for the Bylaw Office consist of a number of statistics relating to the volume of work handled by the division, but do not speak fully to the performance of the division or the quality of service provided. The Manager, Bylaw and Licensing Services will ensure that performance metrics are established that measure the quality of service provided by the Bylaw Office.

These and other audit findings and recommendations are contained in the report.

A handwritten signature in cursive script, appearing to read "Tony Hui", written over a horizontal line.

Tony Hui, CPA, CA, CRMA  
Chief of Internal Audit Division

## A. BACKGROUND

The City of Vancouver's Internal Audit Division was engaged by the City of Victoria Finance Department to conduct a value-added audit of the City of Victoria's Bylaw and Licensing Services Division (Bylaw Office). The objective of the audit is to assist City of Victoria management with improving the efficiency and effectiveness of the Bylaw Office and aligning the enforcement approach with Council's expectations for customer service and risk mitigation.

The Bylaw and Licensing Services Division operates as part of the Legislative and Regulatory Services Department and is responsible for enforcing City of Victoria's bylaws. Staff daily work assignments are focused on three somewhat distinct work activities: parks patrol, public space patrol, complaint response, and business license approvals. Animal control issues, parking enforcement, and moving violations are handled by other departments or external agencies. However, the contract management of the animal control service provider is a responsibility of the Bylaw Office Manager.

The current composition of the Bylaw Office consists of one manager, one clerk, two senior bylaw officers, and three bylaw officers. Auxiliary staff are hired to complement the team's efforts in parks patrols in the summer months. For 2015, funding was obtained to hire two additional officers for April to October. As this funding has not been committed for future years, this may impact the ability of current staff resources to maintain existing service levels.

## B. SCOPE

The scope for the audit, as agreed to by management in the City of Victoria Finance Department, included:

- Staffing and structure, including flexibility and hours of work;
- Strategy and approach, including bylaw areas of focus, customer experience, and collaboration with other departments;
- Operational efficiency and adequacy of staff resources; and
- Benchmarking / best practices review.

The following areas were considered out of scope:

- Revenue recognition and financial reporting of bylaw fines;
- Physical security of the Bylaw Office facility; and
- Animal control operations and parking enforcement.

The audit is not designed to detect fraud. Accordingly there should be no such reliance.

Fieldwork for the audit took place in Victoria and Vancouver, B.C., and covered the period of May 25 to July 14, 2015.

## **C. ACKNOWLEDGEMENT**

We would like to thank management and staff from the City of Victoria's Legislative and Regulatory Services Department, including Bylaw and Licensing Services division staff, as well as the Finance Department for their cooperation and assistance.

## **D. CONCLUSION**

There is an opportunity to position the City of Victoria's Bylaw and Licensing Services Division as a more customer-focused service provider in bylaw enforcement. Also, addressing the operational issues identified in this report would enhance the efficiency and effectiveness of the division.

Findings and recommendations have been discussed with appropriate management and responses incorporated in this report.

## **E. POSITIVE FINDINGS**

Positive findings noted include:

- The Bylaw Office has made improvements to working relationships with other departments and agencies, including joint patrols with the Victoria Police Department.
- Bylaw Office staff availability has increased by adopting a new staffing model with increased working hour coverage, including weekends.

## **F. AUDIT ISSUES, RECOMMENDATIONS AND MANAGEMENT RESPONSES**

### **STRATEGY / DIRECTION**

#### **F.1 Define and communicate the Bylaw Office's mandate**

The City of Victoria's website states that the goal of Bylaw and Licensing Services "... is not to penalize the citizens of Victoria or visitors to our City but, rather, to achieve voluntary compliance through education and the provision of information in order to preserve the quality of life to which each citizen is entitled." Additionally, the City of Victoria has outlined its strategic approach for 2014 as follows:

#### **Four Themes of Focus:**

1. We are "One City";
2. We value our customers and their experience;
3. Our pride to work for the City of Victoria should be evident;
4. "Better is possible" in everything we do.

The Bylaw and Licensing Services Division should have clear departmental mandates that are aligned with the City's overall direction. Interviews with Bylaw staff revealed a lack of understanding of the department's mandate and objectives and a desire for more clarity in this area, as the majority of staff expressed concern that they are unclear on the mandate and are often getting conflicting messages from supervisors and managers.

Staff also raised issues with lack of cohesion on the team, and various interpersonal conflicts that have arisen during the past few years. Having a clearly defined mission and mandate would assist with aligning a team's activities, provide direction for staff's efforts, and enable better decision-making. Communicating the team's mandate to external stakeholders, including other City departments and the general public, would build awareness of the team's activities and could assist in building a more favourable perception of the Bylaw Office. The messaging of the Bylaw Office's webpage is one aspect of external communication that should be considered.

**Recommendations:**

***F.1.1 The Director of Legislative and Regulatory Services should define and document the mandate / mission of the Bylaw and Licensing Services Division and ensure alignment with the City's overall strategy and focus. The revised mandate should then be communicated to all Bylaw staff.***

***Target completion date: October 31, 2015***

***Management Response:***

***Please check one:***

- ☒ Agree with the findings  
☐ Disagree with the findings

***Please check one:***

- ☒ Agree with the recommendation  
☐ Disagree with the recommendation

***F.1.2 The Director of Legislative and Regulatory Services should review the current internal and external (e.g. City website) messaging around the role and mandate of the Bylaw and Licensing Services Division and ensure it is updated to reflect the latest mandate.***

***Target completion date: October 31, 2015***

***Management Response:***

***Please check one:***

- ☒ Agree with the findings  
☐ Disagree with the findings

***Please check one:***

- ☒ Agree with the recommendation  
☐ Disagree with the recommendation

**F.2 Review the scope and focus of the Bylaw Office's enforcement activities**

Bylaw Office staff were surveyed regarding the breakdown of their daily activities through the course of the week. Survey results of the Bylaw Office's enforcement activities are summarized as follows:

Table 1: Bylaw Office Work Breakdown

<b>Work Activity</b>	<b>%</b>
Complaint response (non-public space)	20%
Parks Patrol	21%
Public space patrol	16%
Business license approvals / files	9%
Case file entry	20%
Clerical desk coverage	7%
Other	7%
<b>Total</b>	<b>100%</b>

As shown in the table above, the Bylaw Office's current work focus is heavily weighted on patrol activities; parks and public space patrols comprise approximately a third of available work time.

There are 47 City of Victoria bylaws which have been identified as enforceable by the City's Bylaw Officers.<sup>1</sup> Additionally, 24 of the 47 have been identified as bylaws that are enforceable proactively, i.e. by patrols, while the remainder are enforced on a reactive basis, i.e. by complaint.

Discussion with management indicated that there has not been a recent review of the bylaws in the scope of the Bylaw Office's authority. Review of each bylaw area and prioritization utilizing a risk-based approach given limited resources, would assist in focusing the Office's activities and ensuring alignment with its stated goals and mandate.

### **Recommendations:**

***F.2.1 The Director of Legislative and Regulatory Services should ensure that the mandate of the Bylaw Office clearly defines the areas of focus for the Bylaw Office with respect to all 47 enforceable bylaws. A priority ranking based on evaluation against set criteria may be useful to identify critical areas. For example, consideration could be given to those bylaws with a safety-related component, those that link to other City of Victoria strategic objectives, or those with a potential revenue / cost recovery component.***

**Target completion date: November 30, 2015**

### ***Management Response:***

*Please check one:*

- ☒ Agree with the findings  
☐ Disagree with the findings

*Please check one:*

- ☒ Agree with the recommendation  
☐ Disagree with the recommendation

***F.2.2 Given the ranking and prioritization of bylaws outlined in F.2.1, the Director of Legislative and Regulatory Services should ensure that service level objectives for both reactive and proactive enforcement activities are established, communicated to Bylaw Office staff, and periodically reviewed. Shift schedules should also be adjusted to reflect the prioritization of focus areas.***

<sup>1</sup> Refer to Appendix A for a complete list of the bylaws enforceable by the Bylaw Office.

**Target completion date: November 30, 2015**

**Management Response:**

*Please check one:*

- ☒ Agree with the findings  
☐ Disagree with the findings

*Please check one:*

- ☒ Agree with the recommendation  
☐ Disagree with the recommendation

**F.3 Enhance management oversight of the Bylaw Office function**

Management oversight is a key control to ensuring that the Bylaw Office is on track to meeting its objectives and is aligned with its stated mandate.

Although the role of Manager, Bylaw and Licensing Services was filled for the past several years, the position is currently vacant. Review of current practices in the Bylaw Office indicates an opportunity for improvement in the following management activities:

- Case file review - there is a lack of management review of in-progress and completed case files. In-progress files should be reviewed, at minimum on a sample basis, and backlog of case files monitored. Additionally, completed case files should be reviewed for timeliness and completeness. Given the volume of case files, a risk-based approach where review is focused on high risk types of cases would be useful.
- Prioritization of work - There is no defined criteria for prioritizing complaints received by the Bylaw Office other than assigning a higher importance to safety-related complaints, as determined by senior bylaw staff. Staff are not aware of a target completion time for either higher priority or regular priority complaints.
- Performance management - Bylaw Office staff indicated that regular periodic performance reviews have not been taking place.

**Recommendation:**

***F.3.1 The Director, Legislative and Regulatory Services should ensure that the role of the new Manager, Bylaw and Licensing Services includes responsibility for oversight in the above-mentioned areas. The processes in the above areas should be reviewed, and well defined by the new Manager, Bylaw and Licensing Services.***

**Target completion date: November 30, 2015**

**Management Response:**

*Please check one:*

- ☒ Agree with the findings  
☐ Disagree with the findings

*Please check one:*

- ☒ Agree with the recommendation  
☐ Disagree with the recommendation

## **CUSTOMER SERVICE FOCUS**

### **F.4 Establish metrics to measure and drive performance**

Current performance metrics for the Bylaw Office consist of a number of statistics relating to the volume of work handled by the division, such as number of calls for service, number of investigations, and number of public contacts. These types of metrics do not speak fully to the performance of the division or the quality of service provided.

To emphasize an efficient customer service approach, targets for complaint response should be established. The online form used to report a bylaw violation indicates that complainants should allow three business days for the issue to be assigned for follow-up; however, there is no process in place to track and report on performance against this target. Given varying levels of complexity for different types of bylaw complaints, separate service targets could be established. Additionally, a customer feedback mechanism would also assist in measuring performance and driving continuous improvement.

#### **Recommendations:**

***F.4.1 The Director, Legislative and Regulatory Services should ensure that performance metrics are established that measure the quality of service provided by the Bylaw Office. Such measures could include complaint response time, file completion / updates, and a measure of customer feedback. Web based and social media options could be considered as tools to enable feedback from citizens.***

***Target completion date: November 30, 2015***

#### ***Management Response:***

***Please check one:***

- ☒ Agree with the findings  
☐ Disagree with the findings

***Please check one:***

- ☒ Agree with the recommendation  
☐ Disagree with the recommendation

### **F.5 Enhance accessibility of the Bylaw Office**

Citizens may contact the Bylaw Office by phone, by fax, by email, or in person during office hours of Monday to Friday 8:00 a.m. to 4:30 p.m.

Phone coverage is typically handled by the Bylaw Office clerk. During scheduled days off, as well as lunch and coffee breaks, a Bylaw Officer, on a rotational basis, is assigned to cover clerical duties including phone coverage. Given the relatively small size of the team, providing phone coverage may not be the most effective use of Bylaw Officers' time. Currently for weekend coverage, the Bylaw Office phone is forwarded to the cell phone of an officer out in the field, as clerical staff are not scheduled to work on the weekend.

Having a dedicated administrative resource that can provide backup phone coverage would assist with providing more consistent and accessible service to customers. Discussions with management in the Finance Department indicated that a planned additional headcount in that area may also be able to serve as a shared administrative resource between Finance, Engineering, and the Bylaw Office.

Accessibility to the Bylaw Office could also be enhanced by revising the requirement for tracking the radio log. Currently, the bylaw clerk manually records the location of officers on patrol, as a safety precaution. Officers use their radios to update their location throughout their shift, which can require numerous updates to the log. While this information may be used to track the officer in the event of an emergency, the police would have to request this information from the clerk. There has not yet been an incident that required this information, but recording the frequent updates diverts the clerk's attention away from customers on the phone or in person.

Another solution such as GPS tracking using smartphone or other similar device may be viable and pose less of an administrative burden. Review of practices of Bylaw Office's in other municipalities revealed that position tracking is not often conducted. Refer to Appendix A for details.

### **Recommendations:**

***F.5.1 The Director, Legislative and Regulatory Services and Director of Finance should review the administrative resources in Finance and the Bylaw Office and assign staff to enable better phone coverage for the Bylaw Office during scheduled breaks, vacations, and weekends.***

***Target completion date: October 31, 2015***

#### ***Management Response:***

***Please check one:***

- ☒ Agree with the findings  
☐ Disagree with the findings

***Please check one:***

- ☒ Agree with the recommendation  
☐ Disagree with the recommendation

***F.5.2 The Director of Legislative and Regulatory Services should review the operational requirements for tracking bylaw officers in the field and consider available technologies and practices employed by other municipalities.***

***Target completion date: November 30, 2015***

#### ***Management Response:***

***Please check one:***

- ☒ Agree with the findings  
☐ Disagree with the findings

***Please check one:***

- ☒ Agree with the recommendation  
☐ Disagree with the recommendation

### **F.6 Standardize customer communication protocols**

The Bylaw Office has a series of operational procedures covering various topics such as issuing tickets, conducting investigations, impounding property, and other administrative matters. However, there are no procedures or guidelines to assist staff with communicating and interacting with citizens while handling complaints and inquiries.

Management has indicated a desire to move toward a softer approach and higher level of customer service when dealing with complaints and inquiries, including an ability to handle



complaints without the need to redirect to other departments of the City. Establishing written guidelines and protocol to assist staff with their dealings with the public would enable a more consistent and customer-focused approach.

Various methods could be employed to enhance and standardize communication, including:

- Use of handout cards containing bylaw excerpts, which could be distributed to citizens when officers are out on patrol. Some bylaw officers indicated that this was an effective communication tool that they had created out of their own initiative, but this is not currently utilized by all officers.
- Operational procedure documentation that includes guidelines for actively responding to complaints. For example, a standard timeframe to initially respond, and a timeline for providing updates to the citizen, even if the issue has not yet been resolved, would be beneficial. Existing operational procedure guidelines may also require updating to ensure alignment with the office's mandate and focus on quality of service.
- Standardized scripts for handling phone inquiries, and introductory written response for email complaints to ensure consistent messaging.
- Use of bylaw officer uniform, which is a current practice and is key to maintaining an authoritative presence, particularly when performing more proactive duties and working in conjunction with law enforcement. However, an option is to issue a more casual second uniform containing the City emblem for officers that are performing low-risk or non-public facing duties. This casual uniform would still be identifiable as a City officer but may project a more approachable image.

#### **Recommendation:**

***F.6.1 The Director of Legislative and Regulatory Services should establish written guidelines to assist with Bylaw Officers' interaction with citizens and update existing operational procedures as required. Consideration should be given to but not limited to the methods outlined above.***

***Target completion date: November 30, 2015***

#### ***Management Response:***

*Please check one:*

- ☒ Agree with the findings  
☐ Disagree with the findings

*Please check one:*

- ☒ Agree with the recommendation  
☐ Disagree with the recommendation

#### **OPERATIONAL EFFICIENCY AND EFFECTIVENESS**

##### **F.7 Strengthen controls relating to ticket cancellations**

Additional control over cancellation of bylaw tickets is required as the following control issues were identified:

- The Bylaw Office Clerk can accept payment for bylaw tickets, cancel tickets, and change or close bylaw files in Tempest. Unauthorized changes or cancellations of tickets may go undetected given the lack of segregation of duties in this process.
- According to the Bylaw Office's file maintained by the clerk, there were 18 tickets cancelled in 2014. This number cannot be readily verified in the Tempest system as

cancelled tickets currently are identified by the same code as tickets that are sent to collections. Seventeen of the 18 tickets were manually traced to the Tempest data, but the data also contained 4 more tickets that appeared to be cancellations and were not tracked in the Bylaw Office's file.

- Approvals and business reasons for the cancellation are not always recorded. There is an Officer Cancellation Form for MTI's which the requesting Bylaw Officer is to submit to the Manager; however, this form is not always completed.

**Recommendations:**

***F.7.1 The Director of Finance and Director of Legislative and Regulatory Services should determine whether payment for bylaw tickets could take place at the Public Service Counter, therefore mitigating the above mentioned segregation of duties issues with the handling of payments at the Bylaw Office. If it is deemed necessary to allow customers the option to pay at the Bylaw Office, Tempest access should be limited so that the Bylaw Office clerk cannot cancel or close bylaw case files in the system.***

**Target completion date: October 31, 2015**

**Management Response:**

*Please check one:*

- ☒ Agree with the findings  
☐ Disagree with the findings

*Please check one:*

- ☒ Agree with the recommendation  
☐ Disagree with the recommendation

***F.7.2 The Director of Legislative and Regulatory Services should revise the process for identifying tickets as cancelled in the Tempest system. The Tempest team should be engaged to configure a report of cancelled tickets. Additionally, process change should be considered whereby Bylaw Office staff use the void ticket work flow option rather than entering a manual adjustment, to increase traceability of cancellations in Tempest.***

**Target completion date: November 30, 2015**

**Management Response:**

*Please check one:*

- ☒ Agree with the findings  
☐ Disagree with the findings

*Please check one:*

- ☒ Agree with the recommendation  
☐ Disagree with the recommendation

***F.7.3 The Director of Legislative and Regulatory Services should reiterate to staff the need to obtain and document approval for ticket cancellation, and establish a process for periodic review of cancelled tickets using Tempest data.***

**Target completion date: December 31, 2015**

**Management Response:***Please check one:*

- ☒ Agree with the findings  
☐ Disagree with the findings

*Please check one:*

- ☒ Agree with the recommendation  
☐ Disagree with the recommendation

**F.8 Streamline ticket issuance and payment process**

Bylaw tickets are currently paper-based, and require the issuing bylaw officer to manually fill in the required information such as offender's name and contact information, bylaw section number, and ticketed amount. Since this is a manual process, there is the potential for errors or omission of required information.

Additionally, the current process requires manual entry of ticket information into the MTI (Municipal Ticketing Information) system by the Bylaw Office clerk. Public Service Counter (PSC) staff indicated that there have been issues with customers wanting to pay a ticket at the PSC, but are unable to as the ticket information has not yet been entered into the system. Without the needed information such as bylaw section number, the PSC cannot accept a bylaw ticket payment.

An option is the use of handheld devices similar as those that are employed by parking enforcement staff. However, given current volume of tickets of approximately 300 per year, the implementation cost may not be warranted. Bylaw staff indicated that a project is underway to have Tempest access while in the field, which would enable real-time updating of ticket information and access to cases ticketing information. The ability to update case files while out in the field would also be an improvement to operational efficiency, as the current practice requires staff to input the information upon their return to the office, often several hours later.

Online payment may be a way to mitigate difficulties in accepting in-person payments for bylaw tickets, and provide additional convenience to citizens. The City of Victoria's online payment website currently offers options to pay parking tickets, utility bills, and business licences, but not bylaw tickets specifically. However, inquiry with the Finance department and Bylaw Office staff indicated that online payment may in fact be possible with the current Tempest system setup.

**Recommendations:**

***F.8.1 The Director of Finance should investigate the use of a suspense account to assist PSC staff in accepting payments for tickets that are either not yet entered into the Tempest system or are containing incomplete information. A copy of the ticket could be retained as documentation as well. This would avoid situations where customer payments cannot be accepted or need to be redirected to the Bylaw Office.***

***Target completion date: November 30, 2015***

**Management Response:***Please check one:*

- ☒ Agree with the findings  
☐ Disagree with the findings

*Please check one:*

- ☒ Agree with the recommendation  
☐ Disagree with the recommendation

***F.8.2 The Director of Legislative and Regulatory Services should work with Parking Enforcement to evaluate whether the use of handheld ticket generating devices similar to those employed by Parking Enforcement would be a cost effective solution for the Bylaw Office, given the current volume of bylaw tickets that are issued.***

***Target completion date: November 30, 2015***

***Management Response:***

*Please check one:*

- ☒ Agree with the findings  
☐ Disagree with the findings

*Please check one:*

- ☒ Agree with the recommendation  
☐ Disagree with the recommendation

***F.8.3 The Director of Finance and Director of Legislative and Regulatory Services should consult with the IT department to determine whether online payment of bylaw tickets is possible given the current configuration of the system. If it is possible, the website should be amended to clearly indicate that bylaw tickets are payable online. If it is not currently possible, the cost to implement this payment solution should be evaluated and a decision made as to whether this system change should be pursued.***

***Target completion date: November 30, 2015***

***Management Response:***

*Please check one:*

- ☒ Agree with the findings  
☐ Disagree with the findings

*Please check one:*

- ☒ Agree with the recommendation  
☐ Disagree with the recommendation

**F.9 Improve integration and cooperation among Bylaw Office staff**

Review of the Bylaw Office's current work processes identified the following opportunities to enhance integration and cooperation among team members:

- Regular staff meetings are not currently taking place. These should be held periodically not only for management to communicate relevant information to staff, but also for staff to share learnings and challenges arising during day-to-day work activities.
- There is a lack of positive feedback and recognition provided to staff for the challenges they face. Customers occasionally send comments via email to the Bylaw Enforcement inbox, which is monitored by a senior bylaw officer. However, these emails are not typically distributed to the team.
- Bylaw Officers only view case files assigned to themselves, which may limit coordination of follow-up in instances where the same or similar issues have been reported by multiple people. Also, in cases where a case is reassigned or no longer requiring follow-up, staff indicated that cases sometimes disappear from an officer's queue without any notification.
- Bylaw Officers maintain their own contacts for other departments and agencies. A standardized contact list for these areas would be beneficial to ensuring that staff have

access to departmental contacts who may potentially be most familiar with issues typically referred by the Bylaw Office.

**Recommendation:**

***F.9.1 The Director of Legislative and Regulatory Services should take steps to improve the integration and coordination of efforts among Bylaw Office staff including: establishing regular staff meetings, taking opportunities to provide positive feedback and recognition to staff, encouraging sharing of information when handling case files, and establishing a reference sheet of key departmental contacts for staff.***

**Target completion date: November 30, 2015**

**Management Response:**

*Please check one:*

☒ Agree with the findings

☐ Disagree with the findings

*Please check one:*

☒ Agree with the recommendation

☐ Disagree with the recommendation

**F.10 Review desired skillsets and training requirements for Bylaw Officers**

A survey of the seven Bylaw Officers revealed the following bylaw enforcement training completed by staff:

**Table 2: Bylaw Officer Training**

<b><u>Training Topic</u></b>	<b><u># of officers</u></b>
Conflict Resolution	5
Violence Prevention	3
Customer Service / Communication	5
Self-defence / Use of force	7
Mental Health issues	3
Crisis intervention	2
First Aid / CPR	6
Safety	5
Bylaw 1	6
Bylaw 2	5
Other *	2

\*Other training includes media training, prosecution training, and leadership training.

Not all officers have customer service / communication related training, crisis intervention, or mental health issues related training. Training requirements should support the mandate of the Bylaw Office, including its focus on customer service.

**Recommendation:**

***F.10.1 The Director of Legislative and Regulatory Services establish a formal training plan to ensure that staff have adequate training to perform job duties safely, efficiently and effectively.***

***Target completion date: December 31, 2015***

***Management Response:***

*Please check one:*

- ☒ Agree with the findings
- ☐ Disagree with the findings

*Please check one:*

- ☒ Agree with the recommendation
- ☐ Disagree with the recommendation

## APPENDIX A: BYLAW CATEGORY ANALYSIS

	Bylaw	Enforcement Approach	Health/Safety Related*
1	Abandoned Properties Bylaw	Proactive	No
2	Amusement Establishment Control Bylaw	Reactive	No
3	Animal Control Bylaw	External**	Yes
4	Auctioneers Bylaw	Reactive	No
5	Bicycle Courier Bylaw	Proactive	No
6	Blasting (Construction) Operations Bylaw	Reactive	Yes
7	Boulevard Tree Lighting Bylaw	Reactive	No
8	Building Bylaw	Reactive	No
9	Business Licence Bylaw	Proactive	No
10	Commercial Vehicle Licensing Bylaw	Proactive	No
11	Dance (All-Night) Event Bylaw	Proactive	No
12	Dance (Club) Bylaw	Proactive	No
13	Electrical Safety Regulation Bylaw	Reactive	Yes
14	Escort and Dating Bylaw	Proactive	No
15	Fence Bylaw	Reactive	No
16	Fire Prevention and Regulation Bylaw	Reactive	Yes
17	Fireworks Bylaw	Proactive	No
18	Heritage Property Maintenance Standards Bylaw	Reactive	No
19	Highway Access Bylaw	Reactive	No
20	Idling Control Bylaw	Proactive	No
21	Litter Prohibition Bylaw, 1977	Proactive	No
22	Noise Bylaw	Proactive	No
23	Nuisance (Business Regulation) Bylaw	Reactive	No
24	Outdoor Market Bylaw	Proactive	No
25	Parking Lot Bylaw	Reactive	No
26	Parks Regulation Bylaw	Proactive	No
27	Pesticide Use Reduction Bylaw	Reactive	Yes
28	Plumbing Bylaw	Reactive	No
29	Property Maintenance Bylaw	Proactive	No
30	Residential Properties Parking Bylaw	Reactive	No
31	Ross Bay Cemetery Bylaw	Proactive	No
32	Sanitary Sewer and Stormwater Utilities Bylaw	Reactive	No
33	Second Hand Dealers Bylaw	Reactive	No
34	Sidewalk Cafes Regulation Bylaw	Proactive	No
35	Sidewalk, Streets and Boulevard Protection Bylaw	Reactive	No
36	Sign Bylaw	Reactive	No

## APPENDIX A (CONT'D): BYLAW CATEGORY ANALYSIS

	Bylaw	Enforcement Approach	Health/Safety Related*
37	Solid Waste Bylaw	Reactive	Yes
38	Street Collections Bylaw, 1977	Proactive	No
39	Street Vendors Bylaw	Proactive	No
40	Streets and Traffic Bylaw	Proactive	Yes
41	Towing and Immobilizing Companies Bylaw	Proactive	No
42	Tree Preservation Bylaw	Proactive	Yes
43	Trees and Insect Control Bylaw	Reactive	No
44	Vehicles For Hire Bylaw	Proactive	No
45	Vending Machine Bylaw	Reactive	No
46	Waterworks Bylaw	Reactive	No
47	Zoning Regulation Bylaw	Reactive	No

\*For bylaws indicated as not generally being health / safety related, specific bylaw issues / violations may arise that are in fact health / safety related, and vice versa.

\*\* External agency handles this bylaw area.



APPENDIX B: MUNICIPAL BYLAW OFFICE BENCHMARKING SUMMARY

Category	City of Victoria	Municipality 1	Municipality 2	Municipality 3	Municipality 4	Municipality 5	Municipality 6	Municipality 7
Population served	~ 80,000	~ 500,000	~ 200,000	~ 120,000	~ 35,000	~ 100,000	~ 55,000	~ 85,000
Team composition	8: 1 manager 1 Clerk 2 Senior Bylaw Officers 3 Bylaw Officers 1 Business Licence Inspector	36: 1 Department Head 3 Managers 3 By-law Supervisors 24 Senior By-law Officers 5 By-law Officers	31.5: 20 FTE 11 auxiliary 1 part time	15: 2 Bylaw Supervisors 9 Bylaw Officers 4 Auxiliary staff	3: 2 Bylaw Officers, 1 Senior Bylaw Officer	44 auxiliary staff including Parks Patrol	11 staff + volunteers and pound employees	13: 1 manager, 1 Supervisor 5 full time officers and 6 auxiliary staff
Centralized or decentralized model	Somewhat decentralized; parking enforcement, animal control, and traffic/moving violations are handled by other areas.	Centralized	Centralized	Centralized	Centralized	Centralized	Centralized	Somewhat decentralized; split into 2 areas of bylaws.
Bylaw Focus Areas	Business license Noise bylaw Parks regulation Property maintenance Sign bylaw Street vendors bylaw Streets and traffic bylaw Vehicles for hire bylaw Zoning regulation bylaw  Animal control, parking enforcement, and traffic/moving violations not covered.	Animal Control Business Licensing Parking & Commercial Vehicle Enforcement Property Use	Animal Control Animal/Bird/Beekeeping Business Licence Commercial Vehicle Licence Dog Licence Drainage, Dyke and Sanitary Sewer System Fire protection & life safety Fireworks Regulation Newspaper Distribution Noise regulation Parking (off-street) regulation Public health protection Solid waste & Recycling regulation Traffic bylaw Water use restriction Warning traffic tickets	Animal Control Business Licences Commercial Vehicles Litter & Desecration Noise Secondary Suites Signs Street & Traffic (Parking) Unsightly Premises Zoning	Animal control Lawn sprinkling regulations Noise complaints Traffic Unlicensed vehicles Untidy premises Zoning	Animal shelter Business licensing Parks patrol Secondary suites Soil deposits	Animal control Business licensing Community policing Noise control Parking Property maintenance Vector control Zoning for commercial vehicles	Animal control Noise complaints Parking Property maintenance
Office service hours	Mon to Fri: 7:00am to 5:30pm; Sat/Sun 7:00am to 4:30pm	Mon to Fri: 8:30am to 4:30pm	Mon to Fri: 8:15am to 5:00pm	Mon to Fri: 8:00am to 9:00pm; Sat/Sun 9:00am to 5:00pm	Mon to Fri: 8:30am to 5:00pm; 7 day a week coverage.	Mon to Fri: 8:30am to 4:45pm; Thurs: 8:30 am to 8:00 pm	Mon to Fri: 8:30am to 4:30pm.	Mon to Fri: 8:30am to 5:00pm
After-hours phone coverage	Voicemail. Weekend calls forwarded to officers on patrol.	Phone calls forwarded to Fire department.	Coverage depending on type of call and time of day: health authority, traffic officers, or RCMP involved.	Voicemail. Directed to call the Police for emergencies or Engineering depending on type of issue. Police or Engineering can call Bylaw staff out for emergencies.	After hours calls go to Police non- emergency line.	Voicemail. Directed to call the Police for emergencies. After hours calls for service may be forwarded to the Animal Shelter which is staffed 24/7. The receptionist will dispatch Bylaw Inspectors working on the weekend.	Voicemail. Directed to call the RCMP for emergencies, or animal shelter as appropriate.	Voicemail. Directed to call the RCMP for emergencies.

APPENDIX B (CONT'D): MUNICIPAL BYLAW OFFICE BENCHMARKING SUMMARY

Category	City of Victoria	Municipality 1	Municipality 2	Municipality 3	Municipality 4	Municipality 5	Municipality 6	Municipality 7
Performance targets or metrics	Metrics related to quantity of work. Informal performance targets.	Time-related metrics using a dashboard. Target response time, file close time are tracked.	Daily ticket targets.	Informal - Supervisors review file loads, tickets written and randomly select files for review of content and completeness.	None.	None.	None.	Focus is on performance plans and reviews.
Park patrol activity?	Yes	Yes, during summer months.	Yes, primarily for animal control issues. Some low level involvement with homeless campers.	Yes, mainly for off leash dog concerns.	Yes.	Yes	Yes, especially during times of dry weather conditions and fire risk.	Yes, parks patrolled daily for homeless activity.
Tracking of officers on patrol	Radio log manually updated by clerk, with each officer radioing in every time they arrive or leave location.	Radio contact.	Traffic officers are tracked through police radio contact and Property Use officers are assigned zones. In the process of exploring GPS tracking.	Not tracked. Each Bylaw Officer has an assigned zone in the City for which they respond to complaints and conduct patrols.	Officers are reachable by cell phone. Do not use GPS tracking on the Officers or their vehicle.	Radio contact. Officers are also reachable by cell phone.	Protocol for checking in at fixed intervals during the day and when the shift is over. If a check-in is missed and there is no response by phone, they City vehicle is dispatched to the last known location.	Officers are not tracked, however some of the vehicles contain GPS units.

Benchmarking Summary Notes:

1. Offices employing a more centralized model are staffed to reflect additional enforcement activities (e.g. parking, animal control).
2. Current office hours and accessibility during after-hours appears in line with other municipalities' models.
3. Tracking of officers in field is generally approached from an operational / scheduling standpoint, rather than a requirement to ensure officer safety.