



LONDON POLICE SERVICE BOARD COVER MEMO

MNP ORGANIZATIONAL REVIEW

December 19th, 2025

The attached report presents the governance-related findings from an Organizational Review conducted independently by MNP. This report details the changes implemented at the Board level since the review was completed and the findings and recommendations were established.

The review's findings related to operational matters are separate and fall under the direct purview of the Chief.

BACKGROUND:

In April 2024, the Board announced it would conduct an Organizational Review following a restructuring of the Senior Leadership Team, particularly within the London Police Service's (the Service) HR, Finance, and Legal divisions.

The Board engaged MNP to complete the review and focus on these divisions to:

- Assess whether current resources, structure, technology, policies, and processes support the LPS's future vision.
- Evaluate long-term capacity, including human resources and organizational structure.
- Identify challenges and gaps and provide recommendations to address them.

This review was part of the Board's ongoing efforts to improve service delivery, identify financial efficiencies, and better align resources with core public safety priorities. These priorities include Chief Truong's organizational transformation to modernize the LPS, with a focus on Community Trust, Organizational Wellness, and Community Safety.

This review is complete, and MNP has provided the Board with the attached report outlining the governance-related recommendations.

SUMMARY:

Several findings were identified around the following areas:

- Leadership and modernization momentum.
- Policy and reporting frameworks.
- Investment in people, processes, technology and infrastructure.
- Capacity pressures and uncertainty around the transformation.
- Data and financial oversight.

These are overarching takeaways that span multiple themes:

- Governance modernization must keep pace with operational modernization.
- Modernization requires systematic, not incremental, approaches.
- Capacity building is essential across both the Board and the Service.
- Investment in Corporate Support services is critical.
- Policy clarity and reporting frameworks are crucial to meeting *Community Safety and Policing Act, 2019 (CSPA)* requirements and supporting effective oversight.

The final report outlines eight governance-related recommendations:

- 1) Adopt Governance Best Practices and Clarify Roles and Responsibilities.
- 2) Restructure the Executive Command Team
- 3) Hire a Chief Administrative Officer
- 4) Hire General Counsel
- 5) Update LPSB Policies to Align with the *CSPA*
- 6) Update LPSB Procurement Policy
- 7) Create Financial Management and Budget Policies
- 8) Establish Schedules and Expectations for Reporting.

The Board has been actively advancing work in these areas over the past year, both during and since the review, with several initiatives already underway to support continuous improvement.

In March of 2025, the Board initiated the recruitment process for the Chief Administrative Officer (CAO) and General Counsel (GC) positions, both of which will report directly to the Chief. Mr. Roger Ramkissoon has since been appointed as the CAO, and Mr. Ali Chahbar has been appointed GC.

Mr. Ramkissoon is an accomplished senior executive with extensive experience in policing, public-sector, and non-profit leadership. He is presently the Chief Administrative Officer of the Cobourg Police Service. As a Chartered Professional Accountant with an MBA and Master of Laws, and Certified Human Resources Leader designation, he offers expertise in strategic financial management, governance, and organizational leadership.

Mr. Chahbar brings almost 20 years of legal expertise and a deep understanding of public-sector law, governance, and regulatory compliance to the Service, having previously served as Chair of the London Police Service Board and General Counsel for the Thames Valley District School Board. Mr. Chahbar is recognized for providing clear, strategic legal advice in complex and highly regulated environments.

LOOKING AHEAD:

As the Service transitions to a CAO model, the recommendations on policy, reporting expectations, and schedules will be advanced. Mr. Ramkissoon's leadership in finance and HR operations will be central to driving these changes, and alignment between the Service's operational priorities and the Board's governance direction will support smooth and effective implementation.

Other relevant governance-related board-led initiatives that are underway include:

- Drafting a Governance Manual to clearly outline governance best practices and clarify governance roles and responsibilities.
- Developing and/or amending Organizational Policies to align with the *CSPA*.
- Formally adopting a governance-level Diversity Plan per s. 37(1)(e) of the *CSPA* at its meeting on December 17, 2025.
- Extensive third-party community consultations in early 2026 to inform the next Strategic Plan.
- Significant efforts to delineate the Board from the Service, including developing a separate Board website, logo, and communications, governance policies, and establishing a separate Board office.

All governance recommendations from the Organizational Review are either in progress or have defined plans underway to ensure their completion.



MNP



Finance, Human Resources and Legal Review

London Police Service Board

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Introduction

Overview of Project

London Police Service (“LPS” or “the Service”) has experienced significant changes in multiple facets of the organization. The LPS is currently undergoing restructuring and has several new faces in senior management. The City and the LPS recently announced a significant investment of \$672 million to address public safety challenges in the city as well as ensure the LPS is able to provide adequate service to the growing population it serves. The investment includes new positions, both sworn officers and civilians, and updates to technology tools needed to support and enable the service provision to be more effective.

The London Police Service Board (“LPSB” or “the Board”) wants to ensure that the organization’s finance, human resources and legal services are prepared to support the LPS through this change and into successful implementation. To do this, they invested in a review of the three critical corporate support services.

The review examined organizational policies, procedures, technology systems, job descriptions, and organizational structures to provide context and identify current challenges and any gaps that need to be addressed. The report details current state findings as well as a prioritized list of recommendations that incorporate organizational leading practices and align with the strategic priorities of the LPS.

Project Objectives

The LPSB engaged MNP to complete the service reviews focused on these three areas to:

- Assess whether the organization has the right resources, structure, technology, policies and processes and strategies in place to support the future vision of the LPS.
- Help the organization understand whether it has the appropriate human resource capacity and organizational structure to experience continued success in the long-term.
- Identify current challenges and any gaps that need to be addressed as well as recommendations to address these gaps.

Methodology

A mixed methodological approach using both quantitative and qualitative data was utilized to ensure that the findings of the review are based on multiple lines of evidence. With support and approval from the LPS and the LPSB, internal and external data sources were identified regarding operational process, policy, legislation, and governance information and subsequently collected, consolidated, and analyzed by the MNP team. Additionally, MNP conducted interviews with key stakeholders identified in consultation with LPS and LPSB.

Data Request

MNP requested operational and policy data related to the Finance, Human Resources, and Legal services of the LPS. This included organizational charts, job descriptions, work volumes, and staffing levels, as well as policies and procedures. Additionally, prior reviews or audits, quality and performance data were requested, along with information regarding technology supports within these areas and any relevant governance documents. MNP also collected applicable legislation and regulations.

Internal and External Interviews

Table 1 provides a summary of the agencies and departments that participated in interviews with MNP to inform the development of this report. Interviewees were identified in consultation with the LPS and LPSB project team representatives.

Table 1: Summary Table of Interviews

Agency	Department/Position Title
London Police Service	London Police Service Board Executive Command Team Finance Human Resources Facilities & Fleet Corporate Services Legal Services Psychological Services London Police Association
External Agencies	Siskinds Law Firm (LPSB Legal Counsel) City of London
Comparator Police Services	Halton Regional Police Service Hamilton Police Service Waterloo Regional Police Service

Data Analysis

Multiple types of quantitative and qualitative data were collected for this study to ensure findings and recommendations were based on multiple sources of evidence. Data from interviews were analyzed for recurring and unique comments to identify patterns and to construct themes that highlight central concepts and experiences. Interview notes were not analyzed using data analysis software (e.g., Nvivo), as the volume of data collected did not warrant its use. All reports and other secondary data sources were also analyzed to identify patterns and construct themes, central concepts, and key experiences. Quantitative data were reviewed and synthesized using Microsoft Excel to present an evolving understanding of central concepts and themes.

Environmental Considerations

Several factors within the external and internal environment in which the LPS operates are important considerations in the evaluation of their Finance, Human Resources, and Legal Services service areas. The LPS is governed by provincial legislation and regulations as well as by LPSB policies. Additionally, the LPS has aggressive growth targets which will have workload implications across all three service lines.

Legislation

Several pieces of legislation, including the *Community Safety and Policing Act (CSPA)*, *Occupational Health and Safety Act*, and the *Ontario Human Rights Code* provide a legal framework for the operational and strategic directives of the LPS.

Community Safety & Policing Act

Ontario's *Community Safety and Policing Act (CSPA)* came into effect April 1, 2024, replacing the province's *Police Services Act*. The CSPA outlines the responsibilities of a municipal police service board, the Chief of Police, and all officers. While the mandated responsibilities govern the provision of policing services within the province, they also have implications for a service's governance bodies and Finance, Human Resources, and Legal service areas.

Municipal Police Service Board Responsibilities

The CSPA outlines the responsibilities of a municipal police service board to ensure the provision of adequate and effective policing to fulfill the needs of the population served. Specific mandated duties of a police service board under the CSPA include employing members of the police service, recruiting the Chief of Police and Deputy Chiefs, evaluating the Chief of Police's performance, preparing a diversity plan to ensure the police service is representative of the community it serves, and ensuring that any policing facilities meet regulatory standards¹. As an entity, the LPSB is responsible for providing direction and oversight to the Chief of Police. No individual members of the LPSB, in accordance with the CSPA, have authority to provide direction to the Chief of Police, and the LPSB as an entity may not give direction to individual LPS members aside from the Chief of Police².

Under section 38, the LPSB is also required to ensure policies are established relating to the administration of the police service, provision of policing, disclosure of personal information, secondary activities for members of the service, discipline, and the indemnification of members for legal costs incurred as a result of performing policing duties³.

The CSPA, under section 39, also requires that police service boards develop a strategic plan for the police service addressing the provision of adequate and effective policing including setting objectives and priorities for the police service and establishing quantitative and qualitative performance objectives related to crime prevention, incidence

¹ Government of Ontario, "Police Service Board Duties and Powers," *Community Safety and Policing Act, 2019, S.O. 2019, c.1. Sched. 1*, <https://www.ontario.ca/laws/statute/19c01#BK49>, last accessed January 29, 2025.

² Ibid.

³ Ibid.

of violent crime, property crime, youth crime and related clearance rates, as well as road safety⁴. The strategic plan must also address interactions with youth, racialized and Indigenous individuals, as well as those who may present as having a mental illness or neurodevelopmental disability. The plan must further address IT, resource planning, and police facilities. At minimum, the strategic plan must be reviewed every four years and revised as appropriate.

The CSPA requires that municipal police service boards such as the LPSB complete annual reporting on June 30 to be submitted to the municipality for online publication for the review by the community. The updated reporting requirements include progress towards the implementation of the LPSB's strategic plan and the affairs of the police.

Effectively, the CSPA's requirements for municipal police service boards, including the strategic plan, diversity plan, and related reporting, require that the LPS provide the LPSB with timely and accurate information relating to capital expenditures, budgets, and human resource information relating to recruitment and the diversity of members employed by the LPS. Such requirements necessitate that the Human Resources, Finance and Legal service areas possess the necessary capacity, skills, tools, and resources to support the LPSB's reporting duties.

Section 220 Restrictions on Police Association Membership

Notably, section 220 of the CSPA prohibits top management roles within the police service from membership in the police association if their role would pose a conflict of interest relating to the bargaining process and navigating labour disputes, including the Chief Financial Officer or equivalent role, Chief Administration Officer or equivalent role, Chief Human Resources Officer or equivalent role, and General Counsel⁵. Excluding these roles from police association membership effectively requires that these positions be hired under contract with the LPSB. However, it does not necessarily change the reporting relationships of these roles within the police service under the direction of the Chief of Police.

Implications for LPS Human Resources

The CSPA requirements impact the LPS Human Resources service area through various means. The CSPA requires that the LPSB prepare and adopt a diversity plan to ensure the LPS is representative of the community it serves. This requirement will necessitate that Human Resources provide the LPSB with information on progress made towards achieving the diversity plan objectives, potentially through the monitoring of existing staff characteristics and recruitment efforts.

The legislation and related regulations also establish the essential qualifications and training requirements for all sworn members, necessitating that the Human Resources or a training division has the means to ensure all officers possess all necessary qualifications. Police services must also ensure that police officers hold appropriate educational credentials and complete a 12-months probationary period⁶. Furthermore, the CSPA defines the responsibility of the Chief of Police to establish written procedures regarding disciplinary measures and its

⁴ Ibid.

⁵ Government of Ontario, "Membership and Status," *Community Safety and Policing Act, 2019, S.O. 2019, c.1. Sched. 1*, <https://www.ontario.ca/laws/statute/19c01#BK283>, last accessed January 29, 2025

⁶ Government of Ontario, "Police Officers," *Community Safety and Policing Act, 2019, S.O. 2019, c.1. Sched. 1*, <https://www.ontario.ca/laws/statute/19c01#BK104>, last accessed January 29, 2025.

enforcement⁷. The LPS must therefore develop a solid understanding of these guidelines and ensure all instances of perceived or real misconduct is dealt with appropriately.

The CSPA also outlines the various ways in which the LPS and the LPSB will interact with their collective agreement including actioning movements such as arbitration, bargaining and conciliation⁸. This would require the Human Resources, Finance, and Legal teams to be aware of the necessary steps required to action labour relations movements.

The CSPA mandates that any member that becomes disabled as a result of fulfilling policing duties shall be accommodated⁹, which therefore requires that LPS Human Resources team have effective Abilities Management and Accommodations policies and processes and internal resource capacity.

Implications for LPS Finance

The CSPA requires the LPSB to provide the City of London with operating and capital budget estimates to ensure the provision of adequate and effective policing and to ensure that all police facilities meet regulatory requirements and to ensure equipment and facilities are properly maintained. During labour relations movements, it is the responsibility of the Finance team to ensure all relevant costs associated with labour relations actions are paid. Additionally, the LPSB's strategic plan must also address resource planning for the LPS. Fulfilling this mandate requires the provision of accurate and timely information by the Finance team to ensure that budget estimates are reflective of the LPS's needs.

Implications for LPS Legal Services

The CSPA methodically prescribes the process by which municipal police services must navigate public complaints, including the requirement that any complaint made to the Chief of Police or to a member of the LPSB must be forwarded on to the provincial Complaints Director¹⁰. In the event of a complaint regarding the conduct of a LPS member, it is the responsibility of the LPS to ensure the proper steps are being taken in compliance with the CSPA. This would entail ensuring that all copies of any written documentation as a result of the investigation are being safeguarded and saved in the appropriate employee's personnel file in collaboration with Human Resources.

The CSPA also outlines interactions between the LPSB and the LPS related to the collective agreement including actioning movements such as arbitration, bargaining and conciliation¹¹. Similar to Human Resources, this would require Legal Services to be aware of the necessary steps required to action labour relations movements.

⁷ Government of Ontario, "Procedures," *Community Safety and Policing Act, 2019, S.O. 2019, c.1. Sched. 1*, <https://www.ontario.ca/laws/statute/19c01#BK243>, last accessed January 29, 2025.

⁸ Government of Ontario, "Bargaining and Arbitration," *Community Safety and Policing Act, 2019, S.O. 2019, c.1. Sched. 1*, <https://www.ontario.ca/laws/statute/19c01#BK291>, last accessed January 29, 2025.

⁹ Government of Ontario, "Members of Police Services," *Community Safety and Policing Act, 2019, S.O. 2019, c.1. Sched. 1*, <https://www.ontario.ca/laws/statute/19c01#BK109>

¹⁰ Government of Ontario, "Public Complaints," *Community Safety and Policing Act, 2019, S.O. 2019, c.1. Sched. 1*, <https://www.ontario.ca/laws/statute/19c01#BK193>, last accessed January 29, 2025.

¹¹ Government of Ontario, "Bargaining and Arbitration," *Community Safety and Policing Act, 2019, S.O. 2019, c.1. Sched. 1*, <https://www.ontario.ca/laws/statute/19c01#BK291>, last accessed January 29, 2025.

The prescriptive nature of the CSPA and associated regulations regarding not only complaints but training standards, discipline, use of force, and other facets of policing, create a need for services to have appropriate legal counsel to ensure compliance with the Act.

Occupational Health and Safety Act

The *Occupational Health and Safety Act* (OHSA) outlines the roles and responsibilities of the employer and workers to promote and work within a safe environment. It is the responsibility of the worker to report any health and safety concerns to their employer or supervisor. It is the employer's responsibility to protect the health and safety of employees and to train employees to deal with hazards.

OSHA requires the Human Resources function to create a Health and Safety Committee to address health and safety concerns in the workplace. The committee is responsible for identifying dangerous situations and presenting recommendations to the LPSB. Furthermore, OSHA requires that there is sufficient budget to provide or replace equipment, materials, or protective devices when required.

In alignment with OSHA, it is the responsibility of the LPS to develop and implement a policy regarding workplace violence and harassment. Reviews of these policies should be made on an annual basis. It is the responsibility of LPS to conduct workplace assessments to identify potential risks and advise the Healthy and Safety Committee of any hazards.

While all employers have a responsibility to ensure that employees have appropriate information, training, supervision, and equipment necessary to mitigate workplace safety risks, the policing environment adds a degree of complexity given the inherent safety risks. Ensuring compliance with the legislation, staying abreast of any regulatory changes under the Act, and ensuring all appropriate policies and procedures are in place would have legal implications for a municipal police service.

Human Rights Code

Under Ontario's *Human Rights Code*, employers are required to accommodate the needs of those who have disabilities to ensure equal opportunities for employment so long as it does not constitute undue hardship for the employer¹². A member who becomes mentally or physically disabled as a result of their work with the LPS must therefore be accommodated to the extent possible with consideration for the member's dignity.

The requirement to accommodate the needs of police members and ensure appropriate documentation requires that the Human Resources service area include abilities management and return to work roles. Ensuring Human Resources has robust policies and processes serves to mitigate risk for the organization related to mismanagement of *Human Rights Code* complaints, accommodations or potential missteps.

Supporting Ontario's First Responders Act

The *Supporting Ontario's First Responders Act* of 2016 amended Ontario's *Workplace Safety and Insurance Act* to introduce a "presumption" clause whereby any posttraumatic stress disorder diagnosis in first responders is presumed to relate to employment unless proven otherwise. The Act shifts the responsibility of proof from the

¹² Ontario Human Rights Commission, "8. Duty to accommodate," *Policy on ableism and discrimination based on disability*, <https://www3.ohrc.on.ca/en/policy-ableism-and-discrimination-based-disability/8-duty-accommodate>, last accessed January 29, 2025.

worker to the employer, improving access to WSIB coverage for Ontario police officers¹³. As a result, Human Resource departments within Ontario police services potentially face higher volumes of WSIB claims and potentially longer leaves.

¹³ Government of Ontario, *Supporting Ontario's First Responders Act (Posttraumatic Stress Disorder)*, 2016, <https://www.ontario.ca/laws/statute/s16004>, last accessed January 29, 2025.

Current State

Over the past two years, LPSB has been undergoing efforts to restructure the organization, including the hiring of the new Police Chief, the creation of a third Deputy Chief position, and changes in senior leadership in the Finance, Human Resources, and Legal Services service areas. Currently, the Senior Director of Legal Services, Senior Director of Finance, and Senior Director of Human Resources positions are either vacant or filled with seconded members pending the outcome of this review.

In addition to the restructuring, LPS is described as undergoing a significant amount of change to update the equipment and technology used, including increasing the roll-out of Conducted Energy Weapons (CEWs) and an upcoming introduction of body-worn cameras and in-car cameras. The ongoing restructuring, technology changes, and ambitious recruitment targets, represent a significant amount of change for the organization.

Organizational Growth

LPS has set ambitious growth goals to meet the growing needs of the London community. Between 2024 and 2027, the LPS is looking to add approximately 100 sworn positions and 100 civilian positions, representing a 22% growth over the current staffing levels of approximately 900 members¹⁴ (sworn and civilian). Such ambitious growth is likely to exert pressure on all three service areas under review, considering the impacts on recruiting activities, personnel file maintenance, payroll activities, and the financial planning required to ensure long-term facility and equipment needs are addressed. While the impacts on Finance and Human Resources may be direct, the growth is likely to indirectly impact Legal Services, as increased facility, fleet and equipment needs are likely to translate into additional procurement and related contracts and may present an increased risk for grievances, complaints and coroner's inquests.

Technology Changes

LPS is in the midst of several IT projects that will have significant impact on processes, particularly within the Finance and Human Resources areas. While these IT projects have the potential in the long-term to improve process efficiency and accuracy of reporting, they are also likely to present significant resourcing and change management challenges in the short-term. Planned and ongoing technology projects include:

- **Human Resource Information System (HRIS):** The LPS is in the early stages of implementing an HRIS tool in 2025. An HRIS system has several potential features or capabilities that if properly implemented, will enhance data reliability, employment development and succession planning, scalability, compliance, better decision-making and improve the employee experience overall.

The City of London currently supports LPS by processing payroll and, due to interdependencies, manages the time and attendance tool used by both the City and the LPS. This may limit the LPS' ability to take advantage of all the features in a new HRIS system. It will be important to ensure the new HRIS system can integrate with the finance (payroll) and time and attendance systems used by the LPS to maximize the benefits listed above.

¹⁴ London Police Service, "Our Organization," <https://www.londonpolice.ca/en/about/Our-Organization.aspx>, last accessed February 10, 2025.

- **Budgeting Tool:** The LPS has monies set aside to explore and implement a budgeting tool for the LPS beginning in 2025. At present, this process has not yet started.
- **Time and Attendance:** The shared time and attendance tool used by the City of London and the LPS, Kronos, will no longer be supported as of January 2027. The system is owned and managed by the City of London. The City is going to be exploring a new solution and has invited the LPS to be a part of the exploration. This exploration is just beginning and may experience some delays as the City has limited resources to take on this project. Any tool explored needs to integrate with the financial and HRIS systems. It will be critical that the LPS has identified its requirements early in the exploration to streamline the search for a tool that will meet its needs and not create more workarounds to accommodate the use of disconnected, fragmented solutions.

London Police Service Board

The LPSB sets the strategic priorities as outlined in the London Police Service Strategic Plan and approves the policies that govern LPS operations, both of which set the overarching requirements for the Finance, Human Resources and Legal Services service areas.

London Police Service Strategic Plan

The LPSB’s Strategic Plan for 2024-2027 identifies three strategic priorities for the LPS, including six corresponding objectives¹⁵. Table 2 summarizes the LPSB strategic priorities and objectives as well as the identified actions for the LPS. The LPSB’s objective to establish progressive human resource strategies directly impacts Human Resources, particularly as it relates to the modernization of professional development and succession planning, as well as the focus on recruitment. Additionally, the LPSB’s objective to enhance the effective and efficient service delivery requires that the LPS’s resources are managed in a fiscally responsible manner, which requires strong financial management, quality assurance, analysis and reporting processes.

Table 2 London Police Services Board Strategic Plan 2024-2027 Priorities and Objectives

Strategic Priority	Objective	Action
Our People	1. Investment in our people	<ul style="list-style-type: none"> • Train and equip our members for optimal performance • Empower members to enrich their mental, physical, and emotional wellbeing • Prioritize employee collaboration and engagement
	2. Progressive Human Resource Strategies	<ul style="list-style-type: none"> • Modernize professional development and succession planning • Attract, hire, and retain the best • Foster a culture of belonging and respect in the workplace
Our Community	3. Real and perceived safety	<ul style="list-style-type: none"> • Increase police visibility • Respond effectively to citizens’ calls for service • Make roads safer

¹⁵ London Police Services, “2024 – 2027 Strategic Plan,” *London Police Service 2024 – 2027 Strategic Plan*, , <https://www.londonpolice.ca/en/about/2024-2027-strategic-plan.aspx#Text-Summay>, last accessed January 29, 2025.

Strategic Priority	Objective	Action
	4. Meaningful engagement and collaboration	<ul style="list-style-type: none"> • Cultivate relationships that are inclusive, meaningful, and lasting • Collaborate with partner organizations to improve safety • Empower the public to implement crime prevention strategies
Our Work	5. Leading edge policing practices	<ul style="list-style-type: none"> • Use technology to improve organizational effectiveness and efficiency • Make data available to support sound decision-making • Improve customer service experience
	6. Effective and efficient service delivery	<ul style="list-style-type: none"> • Staff, deploy and manage resources effectively in performing core policing functions • Plan and maintain infrastructure to support future needs and growth • Employ resource management practices demonstrating fiscal responsibility and sustainability

Ensuring that the LPS Finance, Human Resources, and Legal service areas are well-equipped to meet these objectives is a critical consideration within the context of this review.

London Police Service Board Policies

As the governing body, the LPSB is responsible for establishing a solid foundation for the LPS to provide adequate and effective policing services for the City of London. In October, the LPSB approved a review of all policies in light of the new requirements set forth in the CSPA. While this review is ongoing, current LPSB policies that impact the Human Resources, Finance and Legal Services service areas were reviewed and additional consideration was given to identifying opportunities for the introduction of new policies to guide the three service areas.

Financial Services Branch

Reporting up to the Deputy Chief, Operational Wellness and Performance through the Senior Director, Finance, Fleet and Facilities position (currently vacant), the Financial Services Branch is led by the Director, Finance and is organized into three units:

1. **Accounting and Financial Management:** This unit is responsible for overseeing financial operations and ensuring effective financial management. Primary responsibilities include financial analysis and forecasting, budget planning and execution, accounting functions, financial reporting, and procurement support.
2. **Procurement and Materials Management:** This unit is responsible for procurement, managing inventory, and the distribution of police equipment, uniforms, and stationery.
3. **Payroll and Benefits:** This unit is responsible for managing the administration of payroll, benefits, and pension records for employees of the LPS.

Human Resources Division

Reporting up to the Deputy Chief, Operational Wellness and Performance, the Human Resources Division has traditionally been led by the Senior Director, Human Resources (position currently vacant), and is currently being led by the Acting Superintendent Human Resources pending the outcomes of this evaluation. The Human Resources Division is divided into two sections:

1. **Human Resources:** This section is responsible for various people-related matters, including compensation, civilian recruitment, onboarding, training, transfers, resignations and terminations of staff.
2. **Recruiting, Outreach and Member Wellness:** The recruiting unit is responsible for the recruitment of sworn members, including all new recruits and experienced officers. The Outreach Unit is responsible for supporting the recruiting efforts, engaging in outreach activities at college campuses, job fairs, and community group events. The Member Care and Organizational Wellness Unit focuses on the well-being and support of its members, overseeing the reintegration and return-to-work programs, peer support, developing and implementing wellness programs, and health and safety initiatives.

Legal Services

Reporting up to the Chief of Police, Legal Services has traditionally been led by the Senior Director, Legal Services, a position that is currently vacant pending the outcomes of this evaluation. Legal Services is responsible for providing legal advice and guidance to the LPS. Primary responsibilities include legislative compliance, providing advice on employment matters and labour relations, WSIB matters, police discipline matters, access to information requests, police record checks and file destruction appeals, contractual matters including memorandum of understanding with community partners and commercial agreements, procurement, privacy requirements, and drafting operational procedures. Legal Services represents the Chief of Police in appeals to the Information and Privacy Commissioner of Ontario, coroner's inquests, and third-party records applications. Legal Services also provides support for civil litigation matters, including reviewing motions, subpoenas, and summons, coordinating external counsel, and conducting legal research.

Review Findings

Through stakeholder interviews and a review of data provided by the LPS and LPSB, several findings were identified and are discussed in the following section.

1. The LPS Executive Team and LPSB Have Demonstrated Strong Leadership Through Investment in Modernization and Improving Service Delivery

The LPS executive team and LPSB have demonstrated strong leadership through substantial effort and investment in modernizing services and improving service delivery. The committed leadership team is focused on empowering their members and fostering a culture of growth and development. Numerous new initiatives are either in progress or scheduled to begin, with clear evidence that resources will be dedicated to their success. Additionally, strong working relationships exist between the LPS leadership and the LPSB, as well as between the LPS and the London Police Association (LPA). A strategic plan is in place, with resources invested in achieving the service goals, ensuring a well-coordinated and effective approach to policing.

2. Governance Roles and Responsibilities Are Being Defined

Ontario's *Community Safety and Policing Act* (CSPA) clearly sets out the roles and responsibilities of municipal police service boards within the province, including the provision of adequate and effective policing, setting strategic priorities, the development of policies, and the evaluation of the Chief of Police. However, interviews with various stakeholder groups have highlighted areas where the lines between governance and management may have become blurred, and while efforts are underway to define governance roles, additional clarity is required around the LPSB's role and responsibilities, authority, and appropriate reporting and communications channels.

While section 40 of the CSPA affords the LPSB with the authority to provide direction to the Chief of Police, the LPSB may not provide direction to any other individual member of the LPS, and furthermore establishes that individual members of a municipal police service board have no individual authority. In addition to legislative considerations, such actions would also run counter to governance best practices.

3. LPSB Policies are Not Consistently at the Right Level of Detail

LPSB policies were found to be inconsistent in terms of the level of detail, with some policies written at such a high level as to be somewhat unclear in intent, while others were highly prescriptive and operational. As the LPSB Executive Director has been tasked with updating policies to reflect the recently enacted CSPA, an opportunity exists to also ensure that policies are drafted at the right level and with a consistent tone.

4. A Historic Lack of Investment in People, Processes and Technology Has Impacted Organizational Effectiveness and Efficiency

A historic lack of investment in people, processes, and technology has impacted the LPS's ability to perform efficiently. Multiple service areas within the organization rely on outdated manual processes that are time consuming and cumbersome and difficult to scale as the organization grows.

Technology gaps and the high volume of manual, time-consuming processes are said to contribute to errors and rework, creating challenges for the LPS both in terms of effectiveness of the delivery of support services such as Finance, Human Resources, and Legal Services, as well as the efficiency with which these services are provided.

5. A Lack of Investment in Leadership, Mentorship and Training Has Led to Skill Gaps

Likewise, a lack of investment in leadership, mentorship, and training, along with identified challenges with performance management and promotions processes, have resulted in limited organizational processes for developing people and skillsets within the organization. Limited career development and succession planning has led to skill gaps as individuals have been promoted.

6. LPS Facilities Are Beyond Capacity

Stakeholders suggested organizational growth and the historic lack of investment has resulted in facilities being over capacity, creating challenges as the organization looks forward to future growth. The strain placed on facilities is described as contributing to overtime as the team is challenged to keep up and anticipates continued pressure as the LPS pursues ambitious hiring targets.

CSPA requirements for municipal police service boards to address resource planning and police facilities in their strategic plans creates additional pressure to address facility capacity challenges.

7. Fleet Storage Space Is Lacking

Similarly, staffing increases create additional fleet needs, and stakeholders describe the challenges of finding adequate space for vehicle storage, with supplementary space required at the airport.

8. Lack of Senior Officers Association Creates Potential for Conflict of Interest as Supervisors are in the Same Association as Those They Supervise

The lack of a Senior Officers Association means that managers and supervisors find themselves in the same association as those they supervise. This creates the potential for conflicts of interest for supervisors, particularly as it relates to decision-making, as what is best for the community and the organization may not be aligned with what is best for the individual as an association member. This could limit their ability to be objective.

9. The Organization is Undergoing Significant Change, Contributing to Uncertainty and Workload Pressures for Staff

The organization is undergoing significant change across multiple facets, which has created uncertainty for staff and contributed to workload pressures. Change includes new leadership, including the new Chief of Police and two new Deputy Chiefs, vacancies in senior Human Resources, Finance, and Legal Services positions, and ongoing restructuring efforts that have introduced a third Deputy Chief position to the Executive Command Team. Likewise, the organization is in the process of launching several new technology projects, reviewing performance management and promotion processes, and pursuing facility expansion. The recent introduction of the CSPA is further driving the need for policy updates and driving additional legal activity. Each of these projects contributes to workload and requires resourcing.

10. Across All Three Service Areas, Teams are Committed, Hard-Working

Across all three service areas under review, team members were found to be enthusiastic and hardworking. New team members with relevant technical expertise have been brought on board and are keen to learn and implement new ideas.

11. A Positive Working Relationship Exists Between the LPS and LPA

Stakeholder interviews suggest that positive working relationships exist between the LPS and the LPA, which suggests potential for both parties to work collaboratively towards a common goal, leading to more effective problem-solving and a harmonious working environment.

12. Corporate Knowledge and Experience Exist Across All Three Service Areas

In each of the three service areas, key personnel were identified as possessing organizational history and knowledge, particularly in terms of understanding current processes, systems and lessons learned from historical changes. Understanding how decisions were made and lessons learned is invaluable as the organization moves forward.

13. The LPS Executive Team Requires Strategic Leadership Capabilities within the Financial, Legal, and Human Resources Service Areas to Support Strategic Decision-Making

Section 220 of the CSPA prohibits top management roles within the LPS from membership in the police association if their role would give rise to a conflict of interest relating to the bargaining process and navigating labour disputes. This includes Chief Financial Officer, Chief Human Resources Officer, Chief Administrative Officer, General Counsel or equivalent roles.

The LPS executive team has made it clear that the organization requires financial, legal and human resources strategic capabilities and input to advise and support senior leadership decision-making. The need for strategic input from the Finance, Human Resources and Legal Services service areas therefore necessitates advisory leadership roles in these areas, which would put leadership roles in conflict as members of an association, supporting the LPSB's assessment that these roles should remain excluded from the association as contract positions.

14. Policy Gaps May Contribute to Confusion and Insufficient Reporting to the LPSB to Effectively Support Financial Management and Financial Risk Mitigation

The LPSB policies do not outline the expected cadence or content for financial reporting from the Chief of Police to the LPSB, leaving this open to interpretation. LPSB policies likewise do not include financial management or budget policies, and stakeholders describe ad hoc financial reporting requests from the LPSB.

Recommendations

The following recommendations address the findings from the report.

Recommendation 1: Adopt Governance Best Practices and Clarify Governance Roles and Responsibilities

With new leadership in place and a significant investment made in the modernization of the LPS, the LPSB is in a strong position to refocus efforts on establishing governance best practices. This includes:

- Continuing the development of a governance manual
- Establish appropriate communication protocols between the LPSB and the LPS to ensure all communication from the LPSB is directed to the LPS Chief of Police via the LPSB Chair or Executive Director
- Establish appropriate decision-making levels for both the LPSB and the executive leadership team by defining clear decision-making parameters in policy and delegating the decision-making authority to the Chief of Police accordingly

Recommendation 2: Restructure the Executive Command Team

To address the identified need for strategic leadership capabilities and to provide the necessary corporate organizational expertise and strategic-level human resources and financial oversight, it is recommended that the Executive Command Team be restructured to incorporate a Chief Administrative Officer position. This role and the required competencies will be discussed further in recommendation #3.

Recommendation 3: Hire Chief Administrative Officer

The Chief Administrative Officer (CAO) is a senior executive responsible for overseeing the daily administrative operations of corporate services for the LPS. This role involves strategic and operational planning, resource allocation, policy implementation, and ensuring the smooth functioning of all administrative processes. The CAO will be a contract employee with the LPSB, but the contract should specify that the role reports to the Chief of Police.

It is the CAO's role to assist the LPSB and the Chief in setting the direction of the LPS by providing guidance and advice based on trends and leading practice, and the position works closely with the Chief of Police and other senior executives to drive organizational performance and efficiency.

Recommendation 4: Hire General Counsel

The LPS requires a General Counsel to ensure the Chief has necessary legal counsel at a strategic level. Similar to that of the CAO, the search for the new General Counsel should be a joint effort between the LPSB and the Chief of Police. While the contract will be held with the LPSB, this role should report directly to the Chief of Police, and the contract should specify that the Chief of Police is the client.

The General Counsel position is responsible for overseeing all legal matters within the LPS. This role involves providing strategic legal advice, ensuring compliance with laws and regulations, managing legal risks, and leading

the legal team. General Counsel will work closely with senior management to support the organization's mission and objectives.

Recommendation 5: Update LPSB Policies to Align with CSPA

As the LPSB Executive Director has begun reviewing LPSB policies to ensure alignment with Ontario's recently introduced CSPA, a timely opportunity exists to review all LPSB policies to not only ensure legislative and regulatory compliance, but also to ensure policies reflect an appropriate governance lens and best practice standards, remove references to LPS positions that may be nonexistent, employ a consistent policy "voice" and include definitions across all policies for greater clarity.

Recommendation 6: Update LPSB Procurement Policy

The LPSB has already begun a review of their Procurement Policy. This should be completed and finalized as one of the immediate or short-term recommendations.

The Procurement Policy should clearly outline procurement approval authorities, including dollar range and authority for all approved procurement methods, definitions for all procurement methods, processes for engaging in cooperative procurement opportunities, and expectations for reporting to the LPSB.

Recommendation 7: Create Financial Management and Budget Policies

The review identified gaps when it came to financial management policies. The development of a more comprehensive set of financial policies by the LPSB would provide greater clarity and confidence, particularly by setting expectations for the establishment of internal controls and quality assurance processes, such as internal audit procedures.

In combination with recommendations to establish a CAO position with strong financial oversight and to improve the technology used within the Financial Services Branch, the development of robust financial policies by the LPSB will serve to improve the timeliness of financial information being shared with decision makers, clarify reporting requirements and increase the confidence in the accuracy and reliability of financial reporting.

Recommendation 8: Establish Schedules and Expectations for Reporting

Establishing clear expectations for reporting content and timelines from the Chief of Police relating to all three service areas will help support the LPSB's strategic decision-making and fiduciary duty and will support the development of the LPSB's strategic plan and legislated reporting requirements while also introducing predictability for reporting schedules. It will further ensure that all reporting requested by the LPSB connects to the strategic plan, serves to fulfill legislative requirements and implements formalized accountability measures.

Summary of Recommendations

Table 3 provides a summary of recommendations, sorted by timeline.

Table 3 Summary of Recommendations

Recommendations for the LPSB		Timeline
2	Restructure the executive command team	Short
3	Hire Chief Administrative Officer (<i>Dependency: Recommendation 2, Restructure the executive command team</i>)	Short
4	Hire General Counsel	Short
6	Update LPSB procurement policy	Short
7	Create financial management and budget policies	Short
5	Update LPSB policies to align with CSPA	Medium
8	Establish schedules and expectations for reporting	Medium
1	Adopt governance best practices and clarify governance roles and responsibilities	Long



Thank you



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