



**NOVA SCOTIA
FEDERATION OF
MUNICIPALITIES**

September 19, 2023

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Public Safety Canada Contract Policing Consultation Team
Department of Public Safety Canada
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Delivered via Email

Dear Public Safety Canada Contract Policing Consultation Team,

Re: Consultation on Contract Policing

This letter is a submission to the mandated assessment of contract policing in Canada on behalf of the municipalities of Nova Scotia. The Nova Scotia Federation of Municipalities (NSFM) is the collective voice of municipalities in the province. We are a non-profit organization that represents all 375 municipally elected officials and all 49 municipalities. Since 1906, our organization has fostered collaboration between all orders of government in Nova Scotia to ensure that municipalities are equipped to provide a high standard of service to their residents.

We commend the efforts of the Government of Canada to gather important feedback on the RCMP contract policing program in pursuit of a more sustainable and accountable contract policing model. NSFM members often comment on the high-quality of service provided by RCMP officers. However, the overarching relationship created by the Policing Service Agreements (PSAs) and the state of the RCMP labour force present a number of challenges that we would like to bring to your attention.

As you will see below, we have organized our submission around the key themes of this consultation as listed in the Discussion Guide for Contract Policing Engagement. The points below are derived from direct engagement with our members receiving contract policing services from the RCMP, and from comments made during our meeting with the consultation team on August 30, 2023.

Governance and Accountability

As stated in the Discussion Guide for this consultation, “governance can be defined as local and national decision-making, management, administration, and accountability structures and practices of the contract policing program.” In Nova Scotia, municipalities receiving policing services from the RCMP liaise with their police forces through an Advisory Board. While the requirement and composition of these Advisory Boards is established in provincial legislation, the implications they have for an RCMP Member in Charge is determined by the Policing Service Agreements. Therefore, improvements to the PSAs could support more effective governance, oversight, transparency, and accountability from the perspective of municipalities.

In the current context, Advisory Boards *can be* effective forums to discuss incident rates, vacancy rates, and progress on priority projects. Some municipalities have succeeded in developing an informative and collaborative dynamic with their respective Member in Charge. However, in other cases, municipalities experience difficulties 1) developing this dynamic with their Member in Charge, 2) contributing to the objectives, priorities, and goals of police officers in their jurisdiction, and 3) receiving important information. A strong relationship between contract partners and commanding officers is an asset for providing high standards of public safety and responsiveness. Therefore, PSAs should, as much as possible, ensure a strong and responsive relationship in all cases.

Municipal Policing Service Agreement (MPSA) holders should have more discretion to set objectives, priorities, and goals for officers working in their jurisdiction. Policing standards are appropriately determined federally and provincially, but enabling municipalities to determine objectives, priorities, and goals in collaboration with their Member in Charge will lead to more responsive service delivery. Objectives, priorities, and goals could be determined jointly by municipalities in the case of a district policing model. MPSA section 7.2 should include an annual report on the implementation of objectives, priorities, and goals to complement the standard items listed in section 8.1 and 17.1 c) of the MPSA. Infrastructural plans should also be included in the minimum required information in MPSA section 17.1 (c). To ensure municipalities are sufficiently informed, they should be entitled to quarterly Resources and Organization reports, as is provided in section 8 of the Provincial Policing Service Agreement (PPSA), rather than annual reports of this nature. Our members often mention that they have difficulty obtaining information about staffing levels, costs, and clearance rates. Standardizing reporting on these items will lead to significant improvements in terms of governance and accountability.

Finally, to improve the PSAs in terms of management and accountability, municipalities should have more control over who is leading and working in their respective detachments if concerns with a specific RCMP member arise. MPSA section 7.4 should more closely resemble PPSA sections 7.4-7.6 to ensure that concerns with commanding officers are responded to sufficiently. Municipalities should also be able to refuse an increase of officers and support staff in the police force or receive a written explanation justifying this increase, as is provided in PPSA Article 5.4 e). These changes will improve the governance and accountability provisions of contract policing.

Program Sustainability and Cost

As is acknowledged in the Engagement Guide, policing costs are rising across Canada. These rising costs are especially pressing for the order of government with the least access to tax revenue. Further, in terms of contract policing, municipalities are responsible for paying a large portion of a rising, overall cost. This leads to an inverse relationship between the amount that municipalities pay into contract policing and the amount of discretion they have over these costs. This inverse relationship can be addressed by increasing municipal discretion or revising the allocation of financial responsibilities.

While the cost of policing service is largely composed of operational costs, there are also capital costs for Equipment–Type A that create challenges of affordability and sustainability. The \$150,000 threshold for Equipment–Type A purchases to be financed through the PSAs is too low and municipalities lack the ability to decline the costs of this type of equipment. The option to amortize these costs is useful but not sufficient to ensure financial sustainability. In terms of MPSAs, approval of Equipment–Type A purchases should be required for all municipalities, not just those with a population of 15,000 or higher. In terms of the PPSA, as municipalities pay for a large portion of the overall cost of the PPSA in Nova Scotia, municipalities should be consulted about upcoming Equipment–Type A purchases that will impact their budgets before the decision to purchase this equipment is made.

The principles of achieving greater predictability, efficiency, and transparency when budgeting for future policing costs is already embedded in the MPSAs and PPSA in Nova Scotia. However, these principles are not always fulfilled in practice. MPSAs should include Governing Principles of “affordability of the program for both parties” as is included in the PPSA section 12.1 (c). Enacting these values in timely and well-planned consultations on upcoming expenses is called for to ensure the sustainability of contract policing.

In order to pay appropriate attention to the impacts that rising costs have on municipalities, the additional principle of **equity** should be included as a principle in future discussions. In recognition of the substantial amount that municipalities pay into contract policing, the principle of **municipal recognition and inclusion** should also be included as a principle for future discussions. In the spirit of municipal inclusion, an MPSA position on the pension panel, referenced in PPSA section 11.9, could be created. More importantly, municipal inclusion in both the short-term and long-term discussions on cost sharing across jurisdictions should be reflected in the PSAs and overall conduct of contract policing.

As mentioned at the outset of this section, the rising cost of policing, in conjunction with the sheer number of items included in Article 11 of the PSAs, calls for a rearrangement. This rearrangement could include a revised cost-share formula, or a reduced list of expenses included in Article 11. Contract policing is a collective effort by all orders of government and the RCMP to ensure a high standard of public safety in all provinces in which the RCMP is employed. Municipalities are ready to use their advantageous local

focus to help accomplish this goal. At the same time, municipalities look to the orders of government with a more advantageous set of revenue generating tools to take on a larger share of the total costs of policing. This revision of cost-share responsibilities will substantially increase the sustainability of the contract policing program.

Service Delivery

Elected municipal officials often specify that they are grateful for the hard work of RCMP officers and support staff. Collaborative Members in Charge and rank and file officers exemplify what works in contract policing. The support and resources provided by the RCMP in response to major crimes is another point of common approval regarding contract policing. However, responses to certain types of crime, such as cybercrime have been disappointing, described as a “reporting exercise” as opposed to actual investigations.

As is well known, labour shortages and the various demands on the time and attention of officers create areas of significant concern. The current amount of hard and soft vacancies among RCMP detachments is a barrier to ensuring a high standard of service delivery. As a percentage of the total officer positions funded by contract policing, Nova Scotia features one of the largest amounts of combined hard and soft vacancies in Canada. These vacancies must be filled, or backfilled, with qualified and well-trained officers in order to provide the services that municipalities, and their taxpayers, are paying for. The impact of vacancies is most concerning in the case of small complements of officers being assigned to large geographic areas, as is the case in many of Nova Scotia’s rural counties and districts. Due to this high level of vacancies, it is all the more important to identify the minimum number of officers necessary to maintain sufficient service standards for contract partners. This minimum number could be determined by using a formula similar to the General Duty Policing Resource Model and referencing this formula in PSAs. As Public Safety Canada is surely aware, insufficient police complements present serious risks to officers themselves and the broader public. To allow contract partners to keep better track of how often positions need to be backfilled and how often backfilling involves overtime, the RCMP should begin collecting and sharing such data with contract partners or at the Contract Management Committee.

Officers are often required to fulfill duties that could be fulfilled by a non-officer position. Responsibilities, such as preparing court documents and chaperoning individuals brought to a hospital for being admitted for care, draw officers away from important investigative and other frontline responsibilities. In the interest of using officer time wisely and increasing visibility in the community in the process, the RCMP should devise plans for detachment assistants and civilian members to help police officers complete these and other additional responsibilities. Further, alternative service models should be developed in order to bolster policing service with staff that specialize in mental health needs, de-escalation, and community-level resources.

Streamlining the cadet training program will help to get officers deployed sooner, but standards of training must be maintained, and even increased, in order to ensure that officers are able to properly understand the public safety needs that they may encounter. Therefore, we call for the development of a training, recruitment and retention plan that will reduce the high numbers of vacancies, stabilize the number of active-duty officers, and sustainably support a high standard of public safety.

Again, as stated above, enabling municipalities to determine objectives, priorities, and goals of their police force in collaboration with their Member in Charge will lead to more responsive service delivery. This level of collaboration will ensure that locally specific concerns are tended to and stronger relationships between local communities and the RCMP are developed. Community policing is another important way to build relationships with community members and prevent crime. RCMP Officers, specifically Members in Charge, should be mandated to work with municipal councils as part of their community policing efforts. In order to support this effort, the RCMP should be more diligent in filling Community Liaison Officer positions in a timely manner.

Along with highly trained officers, one of the most valuable assets offered by contract policing is access to national support and specialized services. If the number of officers allocated to contract policing is to be reduced, maintaining access to central support and specialized services is recommended.

Long-term Vision (present to 2032 and beyond)

Municipalities play an important role overseeing local development and the provision of necessary services. The abovementioned issues and recommendations shape a path forward to a more sustainable and responsive approach to providing policing services. Each municipality seeks strong, trusting relationships with the diverse groups that make up their communities, the prevention of crime when possible, and enforcement of the law when necessary. Police forces, such as the RCMP, are an indispensable partner in this effort.

Municipalities work hard to deliver a high standard of service to their residents; policing services is among the most important and most expensive. As part of this hard work, municipal elected officials and staff balance budgets with the revenue streams they have access to. Policing is an indispensable service but one that must be financially feasible. If municipalities are not able to secure value for their communities in return for the investment that they make in contract policing, other options will need to be identified. A desire to find an alternative source of policing is clearly expressed by a Request for Proposals that was recently issued for policing services by one of our members.

Overall, Nova Scotian municipalities desire more discretion and information on the objectives, priorities, goals, and composition of their police force, a more equitable process of determining costs of policing, and a dedicated, collective effort to increase standards of service delivery. Municipalities also value strong relationships with their

police force and commanding officers and believe that the PSA should facilitate this relationship.

This is surely an important point in a long-term conversation over the viability and implementation of contract policing in Canada. NSFM calls for the continued inclusion of our members as this conversation advances. Specifically, our members are eager to learn about the findings of this consultation and to receive clear indication regarding the continuation of contract policing after 2032. Once again, we commend Public Safety Canada for conducting this consultation.

Kind regards,

Brenda Chisholm-B

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