



REPORT TO THE POLICE SERVICE BOARD

Author: Vidal Chavannes

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Title: Status of the Implementation of the CSPA and Related Costs

RECOMMENDATION

That the Board receives the Status of the Implementation of the Community Safety and Policing Act and related costs report, for information.

EXECUTIVE SUMMARY

The Community Safety and Policing Act, 2019 (CSPA) officially came into force on April 1, 2024, ushering in a modernized legislative framework for policing in Ontario. Since the submission of our initial report to the Board in February 2024, the Service has made substantial progress in implementing the regulatory and operational changes required under the CSPA. This report provides an update on those efforts, highlights key areas of organizational growth, and outlines ongoing challenges and next steps.

It is important to note that last month, the Board received the *Adequate and Effective Policing* monitoring report, which outlined many of the broader organizational efforts underway to meet the requirements of the CSPA. This current report should be viewed as a companion to that submission, focusing more specifically on the staffing, training, and equipment considerations that are central to our implementation strategy.

A significant focus of our implementation strategy has been strengthening leadership capacity and ensuring operational readiness. To that end, we have increased the number of supervisory personnel on the front line to meet the demands of legislated response protocols, particularly for major incidents, critical event management, and active attacker scenarios. These additions enhance oversight, accountability, and the Service's ability to fulfill new command responsibilities outlined in the legislation.

In parallel, the Service has expanded its Training and Education Units to address the substantial increase in learning demands associated with the CSPA. Although some training requirements have been deferred or remain under review, the Service has moved proactively to prepare for rank-specific, role-based, and specialty unit training. This includes programming in incident command, public order, use of force, de-escalation, mental health response, and investigative best practices.

The introduction of the CSPA has also prompted a comprehensive review and update of the Service's internal directives, policies, and procedures. As new regulations take effect, the Service has prioritized the alignment of its governance framework to ensure legislative compliance, operational clarity, and consistency across units. This policy modernization effort spans areas such as discipline, equipment standards, incident response protocols, and inter-agency coordination.

In addition to staffing and policy updates, this report revisits the significant equipment-related costs initially projected, many of which are now in procurement or deployment stages. The Service continues to manage these transitions with a phased, fiscally responsible approach in alignment with the timelines set

out in the Act.

The Service remains committed to ensuring full compliance with the CSPA, while also leveraging this opportunity to build a more responsive, effective, and community-focused police service.

DISCUSSION:

The Service continues to evaluate and implement changes related to the CSPA. Below is a summary of key areas of impact:

Organizational Readiness and Staffing Implications

To meet the operational and leadership requirements established by the CSPA, the Service has increased the number of supervisory personnel on the front line. These additional supervisors are critical in fulfilling roles such as Incident Command and ensuring oversight during major incidents and high-risk operations. This expansion supports the legislative requirement for structured leadership responses and facilitates greater accountability during critical incidents.

In parallel, the Service is expanding its Training and Education Units. With the anticipated rise in mandatory and rank-specific training, including courses on de-escalation, use of force, incident command, specialty investigations, and public order policing, the training capacity must grow to support both new and existing members. Additional instructors, scheduling resources, and facilities are required to meet these demands.

These strategic staffing increases will position the Service to effectively manage the transition to CSPA requirements and ensure sustained service excellence.

Major Case Management Directives

- **Major Case Management System** (updated November 2024),
 - Relevant legislation: Ontario Regulation 394/23 Major Case Management and Approved Software Requirements governs investigations of major cases; Ontario Regulation 395/23 Investigations, all reportable investigations defined in Section 18(1) must be reported to ViCLAS; the Community Safety and Policing Act requires the chief of police to develop procedures on major case management that are consistent with Ontario Regulation 394/23.
- **Criminal Investigation Management Plan** (updated February 2025)
 - Relevant legislation: Ontario Regulation 394/23 Major Case Management and Approved Software Requirements governs investigations of major cases; Ontario Regulation 395/23 Investigations, all reportable investigations defined in Section 18(1) must be reported to ViCLAS; the Community Safety and Policing Act requires the chief of police to develop procedures on major case management that are consistent with Ontario Regulation 394/23.
- **ViCLAS Reporting Procedures** (updated Jun 2024)
 - Relevant legislation: Section 18. of O. Reg. 395/23: Investigations requires submission of the ViCLAS Booklet (RCMP GRC 3364e) within 30 days from the start of an investigation; police services to use data from their Records Management System, not PowerCase, to prepare and submit a ViCLAS Annual Report to the Ministry of the Solicitor General (SOLGEN).

Active Attacker Directives

- **Active Attacker and Immediate Action Rapid Deployment** (updated Nov 2024)
 - Relevant legislation: In accordance with Ontario Regulation 393/23 section 2(1), police officers shall be deployed immediately to an incident involving an active attacker; Ontario Regulation 393/23 section 2(2) requires the response priorities listed below to be done in the following order: to stop the active attacker, to preserve life, to restore order. Ontario Regulation 393/23 requires every police officer who performs community patrol functions, and who may be required to respond to an incident involving an active attacker, to have ready access to the medical supplies and equipment in accordance with section 4 of this regulation. Section 5 of Ontario Regulation 393/23 requires the chief of police to take reasonable steps to ensure victims can receive support following an incident involving an active attacker. Section 6 of Ontario Regulation 393/23 requires the chief of police to ensure the public is informed about active attacker incidents. Section 7 of Ontario Regulation 393/23 requires the chief of police to establish procedures for responding to active attacker incidents. Section 8 of Ontario Regulation 393/23 requires the chief of police to prepare a report reviewing and evaluating the service's response to the incident.
- **Tactical Support Unit and Hostage Rescue Team** (updated Oct 2024)
 - Relevant legislation: Section 9(1) of Ontario Regulation 392/23 Adequate and Effective Policing made under the Community Safety and Policing Act requires: a police service's emergency response to include the functions of a tactical unit and a hostage rescue team, a tactical unit and hostage rescue team with the capacity to deploy a minimum of 12 full time tactical officers, including a supervisor, within a reasonable time, and at least one member of a tactical unit deployed to an incident to have successfully completed the training prescribed by the Minister. In accordance with Section 9(1) of O. Reg 392/23, police officers who are not members of a tactical unit and who are deployed in a containment function, including members of a containment team, shall not employ offensive tactics before the arrival of members of a tactical unit, unless the police officers believe, on reasonable grounds, that to do so is necessary to protect against the loss of life or serious bodily harm. Section 9 of Ontario Regulation 392/23 Adequate and Effective Policing requires a tactical unit to perform containment and apprehension of an armed barricaded person, and a hostage rescue team to perform containment, apprehension of an armed barricaded person, explosive forced entry, hostage rescue. In accordance with Section 9 of O. Reg 392/23, the functions of a tactical unit and hostage rescue team may be provided by a single unit or team that is capable of performing the functions of both a tactical unit and a hostage rescue team. Section 10(1) of O. Reg 392/23 requires every chief of police to establish procedures in relation to the functions of tactical units and tactical rescue teams, authorizing the tactical supervisor or incident commanders to determine how many tactical officers are required to be deployed to an incident and setting out the duties of police officers in respect of establishing preliminary perimeter control and containment until the arrival of a tactical unit or containment team. Section 11(1) of O. Reg 392/23 requires every chief of police to ensure that all members of a tactical unit or hostage rescue team are police officers. O. Reg 392/23 requires every member of a tactical unit or hostage rescue team to be provided with the medical supplies and equipment defined in Schedule 1 of this regulation, coming into effect April 1, 2025. In accordance with O. Reg 392/23 section 9(2), police officers assigned to a tactical unit or hostage rescue team may undertake community patrol when not training or undertaking tactical or hostage rescue activities.
- **Incident Command** (updated Feb 2025)

- Relevant legislation: Section 9 of Ontario Regulation 392/23 Adequate and Effective Policing, requires a police service to provide emergency response 24 hours a day, including the functions of an incident commander. Section 9 of O. Reg 392/23 requires incident commanders to be deployed within a reasonable time. Section 10(1) of O. Reg 392/23 requires every chief of police to establish the following procedures:
 - Setting out the circumstances in which incident commanders will be deployed.
 - Authorizing the tactical supervisor or incident commanders to determine how many tactical officers are required to be deployed to an incident.
 - Specifying the process for authorizing deployment.
 - Identifying operational responsibility for authorizing deployment.
 - Ensuring that an incident commander assigned to manage an incident has successfully completed the training prescribed by the Minister.

Section 11(1) of O. Reg 392/23 requires every chief of police to ensure incident commanders are police officers. Section 6 of Schedule 1 (O. Reg 392/23) under the Community Safety and Policing Act (coming into effect April 1, 2025) prescribes the required equipment and resources that shall be provided to every incident commander. Section 20 of O. Reg 87/24 under the Community Safety and Policing Act outlines the required training for incident commanders.

- **Crisis Negotiators** (updated Nov 2024)
 - Relevant legislation: Section 9 of Ontario Regulation 392/23 Adequate and Effective Policing under the Community Safety and Policing Act, requires a police service to provide emergency response 24 hours a day, including the functions of a crisis negotiator and have the capacity to deploy at least two crisis negotiators simultaneously to any incident requiring the functions of a crisis negotiator. Section 10(1) of O. Reg 392/23 requires every chief of police to establish the procedures regarding the process and operational responsibility for authorizing deployment of crisis negotiators. 2.4. Section 11(1) of O. Reg 392/23 requires every chief of police to ensure crisis negotiators are police officers. Section 5 of Schedule 1 (O. Reg 392/23) under the Community Safety and Policing Act (coming into effect April 1, 2025) prescribes the required equipment and resources that shall be provided to every crisis negotiator. Sections 23 and 24 of O. Reg 87/24: Training under the Community Safety and Policing Act prescribes the initial and ongoing training required for crisis negotiators.
- **Preliminary Perimeter Control and Containment (scheduled July 2025)**
- Gaps in Active Attacker procedure(s) identified by QA:
 - Establishing areas of staging and command, casualty collection points, zones of operation and perimeters and performing ongoing assessment of the security risks of such areas.
 - Transitioning from responding to an active attacker to responding to another type of situation, such as a hostage taking, and making required changes in tactics.
 - Concluding the response operation.
 - Entering the area where the active attacker is believed to be located.
 - Attempting to locate and isolate the active attacker.
 - Attempting to stop the active attacker.
 - Rescuing and recovering casualties once the active attacker has been stopped or when sufficient resources exist.
 - Co-ordinating actions with other responding police officers and emergency medical services and fire department personnel.
 - Making a determination as to whether to move casualties to a location where first aid or medical treatment can be safely provided until the active attacker has been stopped or the situation has been stabilized.
 - Communicating with medical personnel and providing first aid.

- Requesting additional support for rescue activities, if necessary.
- Providing alternative means of transport for casualties, including transport by members of the police service, if necessary.
- Protecting emergency medical and fire department personnel and transporting them to known casualty locations in order to provide on-scene triage

Audits planned for the second half of 2025:

1. *Adequate and Effective Policing: **Required Equipment and Other Resources*** The objective of this audit is to assess compliance to the equipment and resources set out in Schedule 1 of the Adequate and Effective Policing (General) Regulation.
2. *Regulatory Compliance: **Training*** The objective of this audit is to assess compliance to O. Reg 87/24. Training made under the CSPA.

FINANCES

The total financial impact related to equipment acquisition remains consistent with initial projections, at approximately **\$914,600.00**. The Service is currently in the procurement and implementation stages for much of this equipment, adhering to the phased timelines outlined in the CSPA. These costs primarily relate to body armour, breaching tools, ballistic shields, firearms, and specialized equipment for Public Order, Tactical, and Canine Units.

In parallel, there are anticipated financial implications related to the increase in supervisory staffing and the expansion of the Training and Education Units. However, these costs are not yet fully defined. Given the scope of new training requirements introduced under the CSPA, the Service is conducting a comprehensive assessment of its existing training infrastructure—including available facilities, instructional capacity, and scheduling demands—to ensure any financial projections are grounded in operational realities. A more detailed cost analysis related to training delivery and personnel will be provided as this assessment progresses.

The Service remains committed to a fiscally responsible implementation of the CSPA, balancing compliance with sustainability and readiness.

CONCLUSION

The Service remains committed to a proactive, strategic, and adaptive approach to the implementation of the Community Safety and Policing Act. The increase in front-line supervisory staff and the expansion of our Training and Education Units reflect an intentional effort to align our organizational structure with the demands of a modernized policing framework grounded in accountability, preparedness, and community trust.

While significant progress has been made in key areas—including equipment procurement, policy modernization, and leadership capacity building—the implementation of the CSPA is an evolving process. As additional regulatory guidance is released and compliance deadlines approach, the Service will continue to assess and reassess its operational readiness, resource allocation, and procedural alignment to ensure we remain responsive to legislative requirements.

This ongoing evaluation will include a focus on the sustainability of training delivery, the capacity of our facilities, and the integration of supervisory functions across operational units. Further updates, including refined financial forecasting and operational planning, will be brought forward to the Board as this work progresses.

Through this continued diligence, the Service will ensure it not only meets the letter of the law under the CSPA, but also upholds its broader commitment to effective, equitable, and forward-looking community safety.

Report Approval Details

Document Title:	Status of Implementation and Costs - CSPA.docx
Attachments:	
Final Approval Date:	Apr 2, 2025

This report and all of its attachments were approved and signed as outlined below:

Stan MacLellan

A handwritten signature in black ink, appearing to read 'Peter Moreira', with a stylized flourish at the end.

Peter MOREIRA