

To: Corporate Services Committee

From: Tracy Adams, Commissioner,  
Corporate Services Department

Report Number: CORP-19-38

Date of Report: April 10, 2019

Date of Meeting: April 15, 2019

Subject: Enforcement and Inspection Processes Audit

File: C-3100

---

## **1.0 Purpose**

The purpose of this report is to present the KPMG Enforcement and Inspection Processes audit (Attachment 1).

## **2.0 Recommendation**

That the Corporate Services Committee recommend to City Council:

That Report CORP-19-38 dated April 10, 2019 and Attachment 1, being the KPMG Enforcement and Inspection Processes audit, be received for information and that the recommendations and management responses in the KPMG audit be endorsed as the general basis for implementing improvements to enforcement and inspection processes.

## **3.0 Executive Summary**

Not applicable.

## **4.0 Input From Other Sources**

The Enforcement and Inspection Processes audit by KPMG was conducted with the involvement of the appropriate City employees.

## **5.0 Analysis**

The Council-endorsed 2018 Audit Plan included the Enforcement and Inspection Processes audit.

The Enforcement and Inspection Processes audit includes two medium risk recommendations and two low risk recommendations related to the following aspects:

1. Enhancement of inspection and enforcement activity (medium risk)
2. Fire Services oversight of enforcement activity (medium risk)
3. Building Permit and Inspection Services review of permit applications and complaints (low risk)
4. Frequency of benchmarking (low risk)

The KPMG recommendations and the City's management response will be the basis for implementing on-going improvements to enforcement and inspection processes.

## **6.0 Financial Implications**

There are no financial implications at this time.

## **7.0 Relationship to the Oshawa Strategic Plan**

This report responds to the goal of Accountable Leadership, the theme of Our Corporate Culture Demands Excellence and Respect.



Helen Break, Director, Strategic Initiatives,  
City Manager's Office



Tracy Adams, Commissioner  
Corporate Services Department

Attachment



# City of Oshawa

## **Enforcement and inspection processes**

### **Overall report rating**

Yellow-Green: Significant assurance with minor improvement opportunities

KPMG LLP

March 2019

This report contains 38 pages

Appendices comprise 26 pages



## Contents

	Page
1. Executive Summary	3
2. Recommendations	7

## Appendices

- A. Enforcement processes – Building Permit and Inspection Services
- B. Building Permit and Inspection Services – testing results
- C. Enforcement processes – Municipal Law Enforcement
- D. Municipal Law Enforcement – testing results
- E. Enforcement processes – Fire Services
- F. Fire Services – testing results
- G. Staff Involvement and Documents Reviewed

## Distribution

### To (for action):

- Ron Diskey – Commissioner, Community Services
- Paul Ralph – Commissioner, Development Services
- Tracy Adams – Commissioner, Corporate Services
- Derrick Clark – Fire Chief
- Mike Leonard – Chief Building Official, Building Permit and Inspection Services
- Jerry Conlin – Director, Municipal Law Enforcement and Licensing Services

### CC (for information):

- Corporate Leadership Team and audit team

### Sponsor:

- Tracy Adams – Commissioner, Corporate Services

This report, together with its attachments, is provided pursuant to the terms of our engagement. The use of the report is solely for internal purposes by the management of the City of Oshawa, pursuant to the terms of the engagement, it should not be copied or disclosed to any third party or otherwise quoted or referred to, in whole in part, without our written consent.



## Section One

### Executive Summary

#### Conclusion

We have provided an assurance rating of “significant assurance with minor improvement opportunities” following our review of enforcement and inspection processes across the City. Our review focused on enforcement across Fire Services (FS), Municipal Law Enforcement (MLE) and Building Permit & Inspection Services (BPIS) (*“the branches”*). As part of our review we also assessed the key administrative and inspection processes which lead to enforcement action, such as the building permit application processes.

Staff are committed to undertaking enforcement activities to help improve the safety and welfare of City residents. We identified a number of good practices being applied during the course of our review including the process for undertaking site inspections related to permits within BPIS and the processes for dealing with complaints across MLE. Despite the structural challenges that exist, and the systems used in these areas, staff are working positively and in the best interests of the City to promote by-law compliance across the organization.

The systems used across the branches to track enforcement activities have a number of limitations which prevent the City from effectively and efficiently tracking enforcement actions. Systems do not proactively provide prompts or flags to staff for completion of tasks, and, within BPIS for example, do not clearly show what stage of the application process permits are at, resulting in manual review and follow up for staff. Communication between branches is also not consistent or clear partly because of the different systems used by the branches and their limitations in communicating requests/tasks and arrangement of actions, with a lot of this done via email and phone calls. This affects the City’s ability to coordinate inspections and enforcement where possible, leading to reduced efficiencies and increased costs.

During our audit we noted a large amount of activity and paperwork being processed outside of the systems; e.g. scheduling of inspections and management of complaints within BPIS. The systems also have limitations in monitoring and reporting which we noted within MLE; with time spent tailoring reports from the OLI system to track activity. Furthermore, the OLI system does not record the time inspection requests are received to BPIS and so the 48 hour turnaround time for responding to inspections, a requirement under the Building Code Act, is difficult to monitor.

All three branches are due to implement a new system, “CityView” which should address the concerns and limitations within the current systems. It is expected to be rolled out in Q4 of 2020. A separate audit on the implementation of the “CityView” system at key milestones is currently being undertaken by KPMG.



A committee has been set up to oversee the implementation stages of the system, with staff from each of the branches on the committee. The City should continue to track the implementation of "CityView" to ensure the benefits are realized. In addition processes should be re-reviewed before the system is configured to account for new system capabilities and any new practices and processes implemented amongst the three branches following this audit.

While the challenges with communication are partly due to the systems used, it is also due to the current structure of enforcement teams within the branches and their working practices. Enforcement teams currently work under their own individual branches, and some have different work schedules (FS have a four-day work schedule compared with BPIS five-day work schedule). As a result, communication and coordination of enforcement and inspection activities can be challenging. Processes should be revised across the City to set out the requirements of all staff with regards to enforcement and inspection processes, and how issues will be communicated to the relevant staff. More clearly defined inspection and enforcement processes across the Corporation as a whole will lead to better coordination and customer service.

FS have an important role in reviewing permit applications alongside BPIS however as staff sit under their own branch and have different working schedules and duties, communicating and coordinating these reviews is difficult. As at 31 July 2018, 39 applications received over 1 month ago were outstanding and awaiting FS review due to staff vacancies. The City should consider whether BPIS, with the right training, can perform permit application reviews themselves, therefore improving the coordination of applications and giving FS opportunity to focus on other areas of enforcement under the Fire Code. A recent survey provided to us by the Chief Building Official identified that 17 of the 27 municipalities (including City of Cambridge, Milton and Waterloo) did not have their FS branch involved in building permit application reviews. As an alternative option, the City should consider whether a member of FS can sit permanently under BPIS to undertake FS's role under the Act, a concept which has been used by other municipalities.

Lastly the City may consider joining all enforcement activity under one "enforcement team" with the aim of pooling properly trained resources together and improving the overall effectiveness and efficiency of enforcement for the City. We have outlined these three improvement options in greater detail in section two.

Our testing of enforcement activities within FS identified that cases are not routinely reviewed within CRISYS. We also identified exceptions with record keeping and completion of all relevant sections of forms (e.g. inspection records). Periodic reviews of open cases and recently closed cases should be undertaken by management to address the above.

Benchmarking provides a good vehicle for measuring the City against its peers and identifying opportunities for change to enhance processes and practices. The audit found that BPIS undertake regular benchmarking against comparable municipalities through bi-



annual meetings with the Large Municipalities Chief Building Officials (LMCBO). In addition, MLE have recently participated in a benchmarking exercise in partnership with the Town of Richmond Hill, however prior to this MLE had not undertaken any benchmarking since 2014. Benchmarking has been undertaken in conjunction with the Durham Region Fire Chief Association and the Ontario Fire Marshalls Office within FS, however the scope of benchmarking and its regularity has not been formalized in an official review cycle. The City should consider undertaking more regular benchmarking activities and gain an independent perspective of how it performs against other comparable municipalities, which will help identify areas for operational and process improvements.

## Background

This review forms part of the Internal Audit Plan for 2018 for the City of Oshawa ("City" or "Corporation"). At present there are various branches that have responsibility for inspections and enforcement and it is important that these are coordinated wherever possible to ensure efficiency of the service, as well as minimal disruption to the public.

## Objectives

Objective	Description of work undertaken
Objective one To review existing processes in place for enforcement	<p>We have focused our review on the processes around enforcement processes and inspections to ensure that processes and controls are efficient and effective. This included the following:</p> <ul style="list-style-type: none"><li>• The roles and responsibilities for enforcement in Building Permit &amp; Inspection Services, Fire Prevention, and Municipal Law Enforcement;</li><li>• The process for undertaking inspections and enforcement activities;</li><li>• The co-ordination of inspections and other enforcement and review activities between the branches included in the scope of this review;</li><li>• Reporting on enforcement activities throughout the Corporation.</li></ul> <p>Our aim was to assess the efficiency with which existing inspection and enforcement reviews are being delivered, and to identify organizational changes or process improvements that can be made to improve the efficiency and effectiveness of enforcement and inspection activities. Where possible, we have identified comparator municipalities and identified any leading practices which may help to inform the review.</p>

## Areas of good practice

- ✓ **Reporting:** Branches report to Council on an annual basis on enforcement activity. Reports are sufficiently detailed and include information around enforcement activities including compliance with service levels, number of calls received and inspections attended.



- ✓ **MLE Internal assessment of enforcement:** MLE undertake a bi-weekly review of open and closed cases in OLI by individual staff member. Supervisors review current open cases and their compliance with service level standards.
- ✓ **BPIS inspections:** For a sample of building permit applications we confirmed that all relevant inspections by BPIS staff had been undertaken to date when required. Details of this had been recorded on the inspector's record and in OLI.

### Areas for development

- **Enhancement of inspection and enforcement activities:** We identified potential improvements to how branches communicate and coordinate inspection and enforcement activities. The coordination of inspection and enforcement activities under the Building Code Act between BPIS and FS presents challenges given the two teams operate independently and staff are situated within their relevant branches. We have suggested a number of options for consideration by the City to further enhance inspection and enforcement processes. **(See Recommendation One)**
- **Fire Services enforcement:** Our testing of enforcement activities within FS identified exceptions with regards to record keeping and tracking of open cases in CRISYS. **(See Recommendation Two)**

In addition to the above, two low risk recommendations have been raised regarding benchmarking, and the monitoring of enforcement activities within BPIS.

### Recommendations raised

Following our review of the enforcement activities across the City, we have raised the following recommendations: Please see section two of this report for further information.

	High	Medium	Low	Total
Raised	0	2	2	4
Accepted	-	2	2	4

### Acknowledgement

We thank the staff involved for their help in completing this review.

### Contact Information

The contacts at KPMG in connection with this report are:

Tony Malfara, Partner  
Tel: (416) 777-3461  
[tmalfara@kpmg.ca](mailto:tmalfara@kpmg.ca)

Nick Rolfe, Partner  
Tel: (416) 777-3543  
[nicholasrolfe@kpmg.ca](mailto:nicholasrolfe@kpmg.ca)

Rob Hacking, Senior Consultant  
Tel: (416) 777-5247  
[robhacking@kpmg.ca](mailto:robhacking@kpmg.ca)





## Section Two

### Recommendations

This section summarizes the recommendations that we have identified from our work. We have given each of our observations a risk rating as follows:

#### Priority rating for recommendations raised

**High – (Priority One):** Issues arising referring to important matters that are fundamental and material to the system of internal control. The matters observed might cause a system objective not to be met or leave a risk unmitigated and need to be addressed as a matter of urgency.

**Medium – (Priority Two):** Issues arising referring mainly to issues that have an important effect on the controls but do not require immediate action. A system objective may still be met in full or in part or a risk adequately mitigated, the weakness represents a deficiency in the system.

**Low – (Priority Three):** Issues arising that would, if corrected, improve internal control in general but are not vital to the overall system of internal control. These recommendations are of leading practice as opposed to weaknesses that prevent systems objectives being met.

#	Risk	Recommendation	Management response, owner and deadline
1	Med	<p><b>Enhancement of inspection and enforcement activities</b></p> <p>Following our discussions with Fire Services (FS), Municipal Law Enforcement (MLE) and Building Permit and Inspection Services (BPIS), and our testing during the course of our review, we noted the following.</p> <ul style="list-style-type: none"> <li>FS, MLE and BPIS have separate teams responsible for undertaking inspection and enforcement actions for their respective branches. Teams work within their own departments and schedules which can make communication and coordination of enforcement activity challenging.</li> <li>FS have an important role in reviewing permit applications alongside BPIS however as staff sit under their own branch and have different working schedules and duties, communicating and coordinating these reviews is difficult. As at 31 July</li> </ul>	<p><b>Management agrees with the recommendation</b></p> <p>Management agree and will consider improvements between FS and BPIS.</p> <p>Management will advance this issue regarding the responsibility for inspection and enforcement activities for inclusion in future discussions with</p>

#	Risk	Recommendation	Management response, owner and deadline
		<p>2018, 39 applications received over 1 month ago were outstanding and awaiting FS review due to staff vacancies.</p> <p>The three branches are due to implement a new system, CityView, which should address the concerns and limitations with the current systems. It is expected to be rolled out in Q4 of 2020.</p> <p><b>Recommendation:</b></p> <p>We have provided areas of consideration for the City based on our analysis:</p> <p><u>Combining inspection and enforcement activity</u> – The City should consider combining inspection and enforcement activities under one roof as one “inspection and enforcement team”. There is a need across the City for enhanced coordination and communication with regards to inspection and enforcement actions, and while the new CityView system will improve this, a central enforcement team alongside this will improve communications; and provide the tools to process inspection and enforcement activity in a more cost effective and timely manner. In addition, the City should look to cross train staff where appropriate to help improve staffs’ understanding and awareness of how inspection and enforcement actions are undertaken across the City as a whole. This will allow for better collaboration and understanding of processes.</p> <p><u>Review of FS and BPIS roles</u> – The City could retain the current inspection and enforcement structure, but review the role of FS under the Building Code Act. Removing FS staff from these responsibilities and assigning this to BPIS (e.g. for permit application reviews) will ensure that all responsibilities under the Building Code Act are undertaken by a central team, BPIS. This will also enable FS staff to focus on other areas of enforcement under the Fire Code. Discussions between the Corporation and the IAFF Local 465 would have to be held in order to</p>	<p>the relevant labour unions.”</p> <p><b>Owners:</b></p> <p>Ron Diskey, Commissioner, Community Services.</p> <p>Paul Ralph, Commissioner, Development Services.</p> <p><b>Deadline:</b> Q1 2020</p>

#	Risk	Recommendation	Management response, owner and deadline
		<p>ensure all parties can work together to streamline enforcement activities and ensure an effective service.</p> <p><u>Allocate FS resource under BPIS structure</u> – Rather than having FS staff working within the Building Code but under their own FS structure, the City could consider having one FS staff member under BPIS. This concept has been used by other municipalities. (e.g. Oakville)</p> <p>As part of the above approaches, the City should ensure policies and procedures are revised and updated to set out the requirements of all staff with regards to inspections and enforcement, including expectations of staff when undertaking inspections and other enforcement activities, and how issues will be communicated/passed on to the relevant staff. More clearly defined inspection and enforcement processes across the Corporation as a whole will lead to better coordination and customer service.</p> <p>The different models used across comparable municipalities (e.g. Oakville), and the other areas for consideration outlined above, provide opportunities for the City to improve the efficiency and effectiveness of how enforcement activities are delivered. These opportunities could lead to savings for the City, such as through improved resource allocation and reduction in use of assets (e.g. through joint inspections with FS and BPIS)</p>	
2	Med	<p><b>Fire Services oversight of enforcement activity</b></p> <p>Our review of the enforcement activity undertaken by FS identified process and documentation weaknesses including the following:</p> <ul style="list-style-type: none"> <li>There has been inconsistent review of open cases in CRISYS, or open cases in LAGAN to confirm that a file has been created in CRISYS where required. A number of files were still marked as open at the time of the audit due to staff vacancies; and</li> </ul>	<p><b>Management agrees with the recommendation</b></p> <p>Management will review the instances of open cases in CRISYS. Management will follow up with staff to ensure that CRISYS complaints</p>

#	Risk	Recommendation	Management response, owner and deadline
		<ul style="list-style-type: none"> <li>We noted a lack of a clear audit trail of enforcement actions undertaken through review of CRISYS files. We also noted instances where forms had not been fully completed (e.g. Inspection Records). Note that we did not find any exceptions around enforcement activities undertaken from the sample of files tested, rather the points above highlight areas of improvement in how documentation is completed and stored to enable easy review and oversight of actions undertaken.</li> </ul> <p>Management should consider combining enforcement activities or reducing the involvement of FS under the Building Code Act (as per recommendation one). This will help re-distribute some of the workload and create a better balance between BPIS and FS. While the new CityView system should facilitate easier tracking and monitoring of cases, FS should:</p> <ul style="list-style-type: none"> <li>Undertake periodic and timely reviews and assessments of the long standing open cases in CRISYS and OLI and follow up with the relevant staff members;</li> <li>Follow up to ensure staff complete all necessary forms and include sufficient details in CRISYS so complaints can easily be retraced if needed. A periodic sample check of closed cases should be undertaken to ensure compliance.</li> </ul>	<p>are addressed and appropriately closed.</p> <p>An additional Fire Prevention Inspector is being hired in 2019 as per Council approval</p> <p><b>Owner:</b> Ron Diskey, Commissioner, Community Services.</p> <p><b>Deadline:</b> Q4 2019</p>
3	Low	<p><b>BPIS review of permit applications and complaints</b></p> <p>We reviewed the processes undertaken within BPIS to monitor outstanding or ongoing applications and complaints, and the following exceptions were identified:</p> <ul style="list-style-type: none"> <li>We tested five long standing applications from a monthly report run by BPIS showing applications received without a permit issued to determine why. In three cases permits had been cancelled, and in one case an application completed and a permit issued.</li> </ul>	<p><b>Management agrees with the recommendation.</b></p> <p>The City will review the process undertaken by BPIS to ensure that all actions are recorded.</p> <p><b>Owner:</b></p>

#	Risk	Recommendation	Management response, owner and deadline
		<p>However this had not been reflected in OLI and so the application still showed on the report.</p> <ul style="list-style-type: none"> <li>We tested five cases from a monthly report run by BPIS showing any cases without an inspection recorded in 60 days. In one case tested the inspection had since been carried out but this had not been recorded in OLI and so the case still appeared on the report.</li> <li>We noted that actions to follow up complaints are not always clearly recorded. While we were able to obtain reasonable explanations and updates for the complaints we sampled, we identified that record keeping is not always consistent and sometimes actions have been undertaken but not recorded.</li> </ul> <p>The new CityView system should help track and monitor applications and complaints more easily, as there will be standardized responses and prompts built into the system. However, in the meantime, BPIS should:</p> <ul style="list-style-type: none"> <li>Record on the relevant reports the actions undertaken to address applications and cases without inspections within 60 days. Where subsequent actions have been undertaken (inspections undertaken/permits issued) this should be reflected in OLI to prevent the application/case from reappearing on the report.</li> <li>Record the actions undertaken to monitor complaints, including any visits or follow up action taken, so that an accurate record of actions taken by BPIS to rectify complaints is maintained.</li> </ul> <p>Periodic reviews of the above should be undertaken by the Chief Building Official to ensure compliance.</p>	<p>Paul Ralph, Commissioner, Development Services.</p> <p><b>Deadline:</b> Q2 2019</p>
4	Low	<p><b>Frequency of Benchmarking</b></p> <p>We identified inconsistencies in undertaking benchmarking activities across the three branches. BPIS conducts benchmarking on a bi-annual basis through the meetings held by the Large Municipalities Chief Building</p>	<p><b>Management agrees with the recommendation.</b></p> <p>The City will undertake annual</p>

#	Risk	Recommendation	Management response, owner and deadline
		<p>Officials (LMCBO). However, benchmarking is not undertaken as frequently within MLE (an exercise was undertaken in 2014 however not again until 2018), or FS (benchmarking does occur with Durham Region and in the Fire Services Master Plan); however the frequency of benchmarking has not been encompassed in an official cycle of review).</p> <p>Benchmarking is an important tool to assess how the City's inspection and enforcement processes compare to similar municipalities, and will help identify improvements to increase efficiencies and reduce costs.</p> <p>MLE and FS should consider undertaking a more frequent (annual) cycle of municipal benchmarking activities to ensure accurate and up-to-date information is held.</p>	<p>municipal benchmarking to assist in identifying opportunities for improvement.</p> <p><b>Owners:</b></p> <p>Tracy Adams, Commissioner, Corporate Services</p> <p>Ron Diskey, Commissioner, Community Services</p> <p>Paul Ralph, Commissioner, Development Services</p>



## Appendices

### Appendix A: Enforcement processes – Building Permit & Inspection Services

We reviewed the inspection and enforcement processes within Building Permit and Inspection Services (BPIS) with the Chief Building Official and the Manager of Building Permit Services. BPIS have one “building by-law” which incorporates all components of the business, and is governed by the Building Code Act and its regulations. Workload is assigned by a combination of geographic area, complexity, specialty, ability, availability, etc. Workload is reviewed periodically for fair distribution and adjusted as required.

The main enforcement activities across BPIS are the following:

- Enforcement of the building by-law for new applications for building permits, including the undertaking of inspections at different stages of the construction process; and
- Enforcement of the building by-law for individuals who are building without a permit, usually through receipt of complaints.

We have outlined below the processes and key controls for enforcement across BPIS, focusing specifically on the two points above.

#### Permit Applications

Process	Control	KPMG comments on design
↓	↓	↓
Building applications are received by admin staff.	BPIS have 48 hours from receipt of application to determine if the application is complete.	<ul style="list-style-type: none"><li>✓ The 48 hour deadline is recorded in BPIS procedures.</li><li>✓ Applications are assessed and reviewed for completeness, including a review of the fees and drawings. For more complex buildings, applications can be accepted as incomplete and partial permits issued to accommodate construction schedules.</li></ul>

Process	Control	KPMG comments on design
		<ul style="list-style-type: none"> <li>✓ Drawings are also reviewed by Fire Services.</li> <li>✓ Applications are recorded in the OLI system and a file is created by Admin.</li> </ul>
<p>↓</p> <p>A permit card is signed off and issued to the applicant.</p>	<p>↓</p> <p>The Building Code Act states permits should be issued within set timeframes.</p>	<p>↓</p> <ul style="list-style-type: none"> <li>✓ Depending on the building type (houses, medium build or large build) permits must be issued within a certain number of days after determining the application is complete.</li> <li>✓ Permits are signed off by the Chief Building Official.</li> </ul>
<p>↓</p> <p>Inspections are undertaken at various stages of the construction process.</p>	<p>↓</p> <p>Required inspections are outlined on the permit card provided to applicants / owners, so they are aware of the different stages where inspections are required.</p> <p>Inspections are signed off on the "Inspections Record" card once completed, and recorded in OLI.</p>	<p>↓</p> <ul style="list-style-type: none"> <li>✓ Inspections which are required include pre-construction, footing, insulation, fire separations, interior and exterior. Constructors are required to have these inspections under the building by-law.</li> <li>✓ Applicants are required to call out inspectors at various stages of the construction process.</li> </ul>



Process	Control	KPMG comments on design
	Under the Building Code Act, inspections should be attended to within 48 hours.	<p>Building Inspectors are required to attend the inspections within 48 hours of being called. In practice, inspectors often provide same day service where calls are received in the morning and inspections carried out later the same day.</p> <p>✓ Where relevant, Fire Services also undertake inspections, such as fire alarm and sprinkler tests.</p>
<p>↓</p> <p>Cases are marked as complete in OLI once inspections have been completed and occupancy has begun.</p>	<p>↓</p> <p>Case is marked as "complete" in the OLI system after final sign off is given.</p>	<p>↓</p> <p>✓ Once inspections have been completed and occupancy granted, the case is closed in the OLI system and sign off is recorded on the Inspectors record.</p>
<p>Regular reviews of permit applications and in progress constructions are carried out by BPIS staff.</p>	<p>Permit application lists are reviewed by the Chief Building Official and Building staff on a monthly basis.</p> <p>Approved applications which have not had an inspection logged in OLI in over 60 days are reviewed monthly by the Chief Building Official.</p>	<p>✓ The Chief Building Official runs a report from OLI showing all applications received which have not had a permit issued, which includes the details of each application and the potential monetary value for the City. We have tested the operational effectiveness of this</p>

Process	Control	KPMG comments on design
		<p>control in the next Appendix.</p> <ul style="list-style-type: none"> <li>✓ The review of cases with no inspections in 60 helps identify any cases with delayed inspections or inspections which have not been undertaken. These are followed up with the relevant Building Inspector and usually involve a site visit. We have tested the operational effectiveness of this control in the next Appendix.</li> </ul>
Regular reports on activity within BPIS is undertaken	Annual statements of building permit revenues and expenses are reported to Finance in-line with the Building Code Act.	<ul style="list-style-type: none"> <li>✓ We reviewed a copy of the latest annual statement, reported to Finance Committee in the March 2018 meeting. This included statistics on building permit revenues and expenses and the reserve fund.</li> <li>✓ LMCBO report on stats such as the number of permit applications, % of complete applications, average timeframes for issuing permits, permit fees, fee schedules, scope of operations, staff numbers and</li> </ul>
	Bi-annual reporting is undertaken to the Large Municipalities Chief Building Officials (LMCBO), who meet every six months.	

Process	Control	KPMG comments on design
		<p>salaries of building staff. The report combines the statistics for 34 municipalities including the City of Oshawa.</p> <p>✓ A variety of other reports are produced and reported by the Chief Building Official which are circulated to the relevant agencies.</p>

### Complaints

Process	Control	KPMG comments on design
↓	↓	↓
Complaints are received by Admin staff	Complaints are manually recorded on a spreadsheet and assigned an inspector	<ul style="list-style-type: none"> <li>The current OLI system used for permit applications does not support recording complaints. Please see the following Appendix for further analysis on the systems used within BPIS.</li> <li>✓ Complaints are assigned to an inspector. Site visits are usually undertaken to confirm the nature of the complaint. Often, individuals are requested to submit a permit application as they are constructing without one.</li> </ul>

Process	Control	KPMG comments on design
Complaints are reviewed and managed by inspectors	Details of follow up actions are recorded on the spreadsheet	<ul style="list-style-type: none"> <li>✓ Actions to address complaints are recorded on the central spreadsheet. In some cases complaints can lead to orders being issued, some of which lead to legal action being taken.</li> <li>✓ Once closed, the complaint is passed to the Chief Building Official for final review.</li> </ul>
Periodic monitoring and reporting of complaints is undertaken	<p>Complaints are reviewed on a monthly basis by the Chief Building Official</p> <p>Complaint statistics are reported on an annual basis</p>	<ul style="list-style-type: none"> <li>✓ We obtained a copy of the most recent spreadsheet of complaints. The Chief Building Official also keeps record of all closed complaints. For further analysis and testing of complaints see the following Appendix.</li> <li>✓ The Chief Building Official also undertakes annual reporting of complaints which is used internally by management to track the number of complaints received over the period.</li> </ul>

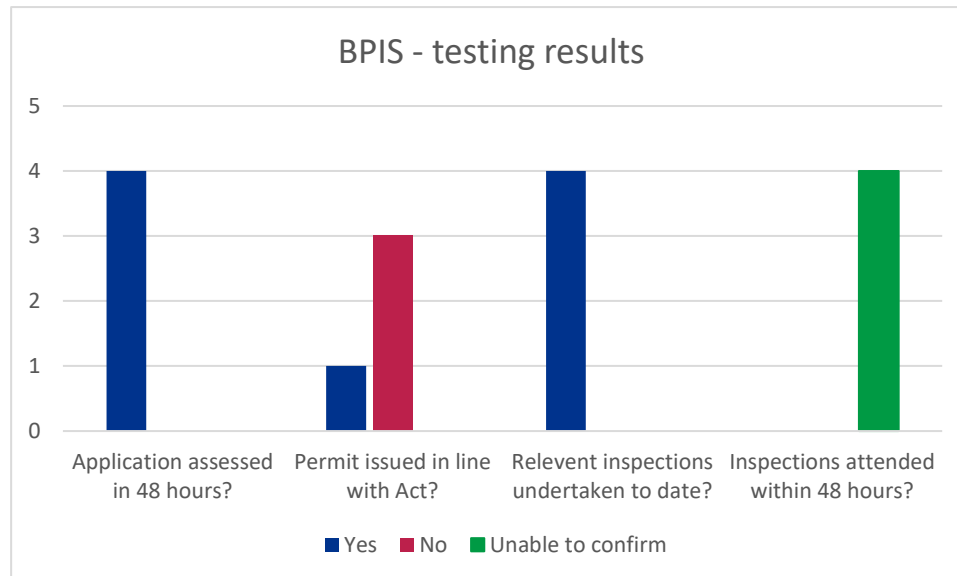
## Appendix B: Building Permit & Inspection Services – Testing results

In this Appendix we have summarized the results of our sample testing of the key controls identified in Appendix A. We have also tested some key controls around the review and oversight of open applications/complaints, as highlighted in the Appendix above.

### Permit Applications – sample testing

We selected a sample of applications on the OLI system. Our sample was selected from a list of permit applications received in the last 12 months. Whilst construction may still be ongoing, we tested to confirm that the relevant inspections to date had been carried out and attended to in a timely manner. For each case we tested to confirm:

- The application was assessed for completeness within 48 hours of receipt;
- For complete applications, the permit was issued within the timeframes stipulated in the Building Code Act;
- The relevant inspections were undertaken in the construction process and recorded on OLI and the Inspectors Record; and
- Inspections were attended to within 48 hours;



See below for a summary of our observations.

### KPMG observations

- ✓ In three cases tested the permit was not issued within the required timeframes under the Act. For each case we were able to confirm appropriate reasons for this, including incomplete applications or queries on the application following the initial assessment. In each of the three cases a waiver form was signed by the applicant waiving the rights for the City to adhere to the timeframes under the Act. Incomplete applications are not subject to provincial timeframes.
- ✓ In all cases tested the relevant inspections had been carried out to date. This included footing, backfill, framing and fire separation inspections. These had been recorded on the inspector's record and in OLI.
- We were unable to confirm whether inspections were attended to within 48 hours as the date of the request was not recorded in OLI. Please refer to page 23 for further details around the OLI system and its capabilities. Whilst this is the case, we were informed that BPIS rigorously enforce this turnaround time, often attending inspections on the same day and allowing for flexibility for inspections to be done outside of working hours if needed.

### Permit Applications – further testing

As part of our testing we reviewed the reports used by BPIS to monitor outstanding or ongoing applications. Our findings can be seen below:

Items reviewed	Reports run (including frequency)	KPMG assessment
Applications without a permit issued	A monthly report is run showing all permit applications which have been received but no permit issued and reviewed by Chief Building Official.	As of July 31 2018 there are 241 applications without a permit issued. We reviewed a sample of five cases and enquired with staff.  In three cases permits had been cancelled, and in one case an application completed, but this had not been reflected in OLI, and so the applications still show on the monthly report. <b>(See Recommendation Three)</b>
Applications with no recent	A report is run monthly showing all applications which have not had an inspection logged in the	As of July 9 2018 there are 188 cases without an inspection in 60 days. We reviewed five cases and enquired with staff.

inspections undertaken	last 60 days and reviewed by the Chief Building Official.	<p>In two cases tested recent visits or checks had been undertaken but not recorded in OLI. In a further two cases, no contact had been undertaken for 18 months and 3 years respectively. See below for further details.</p> <p>In one case tested the application was complete but this had not been reflected in OLI and so the application still showed on the report. <b>(See Recommendation Three)</b></p>
Applications where permits are not issued in time	Bi-annual reporting is undertaken to the Large Municipalities Chief Building Officials (LMCBO), which includes stats on the City's overall performance against the timeframes in the Building Code Act for issuing permits.	<p>From the 2017 calendar year report we identified that the average days for issuing permits in 2017 for houses, small buildings and complex buildings were within the required timeframes stipulated in the Building Code. The average number of days for large buildings was 21 days, one day over the 20 day requirement under the Act. This is mainly due to the volume of large building applications received. It should be noted that overall, the City is performing well in comparison to other similar sized municipalities with regards to the timeframes for issuing permits.</p>

#### Applications with no inspections over 60 days

Our testing above noted some long-standing cases where inspections had not been undertaken for over 60 days, some of which had not been reviewed or followed up for a number of years. In these instances we were informed that the owners had run into financial difficulties and construction temporarily halted, which is a common occurrence for the majority of long standing applications where inspections have not been undertaken for a significant period of time. These are on inspector's radars, who often drive by the construction site when attending to other inspections; however, may not record details of this activity in OLI. Since owners are aware of the requirement to call inspectors when construction resumes (as inspections can be carried out at the various stages) there is minimal risk that these sites are being constructed without the relevant inspections carried out. We have not raised a specific recommendation about this, however have highlighted



the need to ensure a clearer record of the required follow-up action. (See Recommendation Three)

### Complaints – sample testing

We selected a sample complaint from the list of closed complaints maintained by the Chief Building Official. We reviewed the nature of complaint, when it was logged, what actions were undertaken and whether they were appropriate and addressed the complaint. Details of our findings are as follows:

Date complaint received	Details of complaint	Actions undertaken	KPMG assessment
January 2018	Newly renovated property without a permit – 2 unit property.	An inspection was undertaken two days after the complaint was received. An “order to comply” letter was sent to the owners requesting a permit is sought. Permit application submitted, drawings provided and license issued.	Complaint was handled appropriately by Building staff. Permit application was submitted, license issued and complaint closed and updated on the complaints spreadsheet.

### Complaints – further testing

As part of our testing we reviewed the reports used by BPIS to monitor outstanding complaints. We obtained a copy of the most recent monthly report run by the Chief Building Official showing all open complaints, which totaled 53 as of July 2018. We discussed a sample of five complaints with BPIS. Our findings were as follows:

Date complaint received	Appropriate reason for delay in resolution?
April 2018	Inspection undertaken and owner called in May to find out status. Last contact was on May 2 2018. Due to be followed up by the inspector and owner.
February 2017	The city have tried to contact the site supervisor for a meeting however as they travel frequently they have not managed to



	arrange a time. The last contact was in fall 2017 and no follow up action has been undertaken since.
May 2014	Owner was contacted in 2016. The complaint was initially made because the owner was constructing without a permit, however work has now stopped for the last few years. The complaint is still open as a permit may need to be issued. This is monitored regularly by the inspector.
March 2017	This case has currently been taken to court and court proceedings are in progress at the time of the audit fieldwork.
December 2016	Complaint made due to owner building without a permit. Contact made in December 2016 and building work stopped. No contact has been made since.

Our review of complaints identified some long-standing complaints which had not recently been addressed or reviewed. The majority of complaints (around 95%) relate to owners constructing without a permit, and the long standing complaints are often instances where construction has since stopped, then delayed, and not yet resumed. These complaints remain open as, if construction begins again, owners will need to apply for a permit before construction begins. We did note that follow up action is not always clearly recorded on the spreadsheets. While the City are in the implementation stage of the new “CityView” system which will track complaints more easily, BPIS should temporarily ensure further details of follow up action undertaken on complaints is recorded to facilitate easier tracking of actions. **(See Recommendation Three)**

### **Further observations**

Our sample testing and further discussions with BPIS staff identified a number of key points around the OLI system used across BPIS and the role of Fire Services under the Building Code Act.

### **OLI system**

Our analysis of the OLI system and its ability to support the processes undertaken by BPIS identified a number of ways in which systems can be improved. In particular, we noted the limitations around prompts for completion of tasks, tracking of complaints, work streams, reporting and communication.



The City is due to roll out a new system, “CityView” which BPIS will use to replace OLI. A vendor agreement has been finalized and, at the time of the audit, the 26 month project implementation stage was due to start. We were informed that the current limitations should be addressed by the new system, and a member of BPIS will be assisting in the implementation of the new system to ensure the true benefits are realized.

#### Fire services role in building permit applications

Staff from Fire Services play an important role in the building permit application process. Fire Services are required to review building drawings before permits are issued, and undertake inspections during the construction process on certain application types. There are currently two staff from Fire Services who are permitted to undertake these roles as per the building by-laws.

We identified that there are currently a number of building permit applications which are awaiting review from Fire Services before the permits can be issued. In 2018, around 140 permit applications have required Fire Services to review the application; however, due to staff vacancies there was a delay. This in turn affects the City’s compliance with the timeframes for issuing permits under the Building Code Act.

The split of responsibilities around BPIS permit applications under the Building Code Act between FS and BPIS presents challenges given these teams rely on each other to process building permit applications. However, Branches have to balance their workloads and available staff, which can result in not meeting deadlines. In addition, the lack of consistent tracking of these applications can cause delays in the review process.

Taking the above into account, and our discussions with the other branches sampled as part of this audit, we have provided options for consideration by the City on how to enhance and improve building permit inspection and enforcement activities. **(See Recommendation One)**



## Appendix C: Enforcement processes – Municipal Law Enforcement

We reviewed the enforcement processes within Municipal Law Enforcement (MLE) with the Director and Manager of MLE Services. MLE enforce 33 by-laws and two Provincial Acts and have 23 Generalist Officers divided into various teams who are responsible for enforcement actions.

Enforcement is usually undertaken on a complaint basis and are classified into three core areas: property, animals and parking. These complaints are reviewed and assessed by MLE and the relevant sections of the by-law enforced by MLE officers, usually through undertaking on-site investigations.

We have outlined below the processes and key controls for enforcement across MLE.

### MLE Enforcement processes – complaints

Process	Control	KPMG comments on design
<p>Complaints are received and logged in Lagan, which interfaces with OLI</p>	<p>The complaint date is recorded on OLI along with the nature of the complaint</p>	<ul style="list-style-type: none"> <li>✓ The majority of complaints are initially received by Service Oshawa and recorded in LAGAN, a system used by the City to log customer actions, which includes enforcement activity.</li> <li>✓ Complaints recorded in LAGAN automatically filter through to OLI, the system used by MLE to track enforcement actions.</li> <li>✓ MLE also undertake proactive approaches to enforcement, such as officers out on patrol who may identify violations with parking by-laws. In these cases, MLE officers would</li> </ul>

Process	Control	KPMG comments on design
		create an OLI file rather than go through Service Oshawa.
↓	↓	↓
Enforcement actions are distributed by geographical area to be carried out by MLE officers.	<p>Complaints are required to be responded to in-line with MLE Service Level Agreement (SLA)</p> <p>Inspections/site visits, and the enforcement actions applied are recorded in OLI by the MLE officer</p>	<ul style="list-style-type: none"> <li>✓ MLE's SLA states that an "initial response" to the complaint must be undertaken within a required timeframe depending on which by-law it relates to.</li> <li>✓ MLE officers have electronic devices and are able to pick up complaints remotely. In addition, complaints with a short service level are radioed by Service Oshawa.</li> <li>✓ Inspections and enforcement actions are recorded in OLI. Actions vary from attending to properties for properties standards to Administrative Monetary Payments (AMP) for parking violations.</li> </ul>
↓	↓	↓
Complaints are closed in OLI	<p>Complaints are required to be closed within the timeframes stipulated in the SLA.</p> <p>The complaint is marked as closed in OLI by the MLE</p>	<ul style="list-style-type: none"> <li>✓ MLE's SLA states that a "complete resolution" must be made within a required timeframe depending on which by-law it relates to.</li> </ul>

Process	Control	KPMG comments on design
	Officer, which interfaces back to LAGAN.	
↓	↓	↓
Review and reporting of open and closed complaints is undertaken by MLE	Bi-weekly reports are run from OLI and open/closed files are reviewed by Supervisors	<ul style="list-style-type: none"> <li>✓ We reviewed a sample of bi-weekly reports run by MLE Officers and confirmed these are reviewed regularly.</li> <li>✓ Status reports are sufficiently detailed and statistics are broken down by individual officers. Stats include current open (OLI) files, files closed in the period, number of overdue SLA's and amount of AMP's applied where appropriate. Supervisors also review recently closed files and assess the actions undertaken by MLE officers.</li> <li>• We have undertaken further analysis on any long-standing open files in the following Appendix.</li> </ul>
	Complaint statistics are reported to committee and Council annually.	<ul style="list-style-type: none"> <li>✓ We obtained a copy of the annual report for 2017 which was presented to Council in March 2018.</li> <li>✓ We confirmed extensive reporting is undertaken to Council. This includes</li> </ul>



Process	Control	KPMG comments on design
		a three year average analysis on the number of complaints received across the different enforcement activities and statistics on compliance with the SLA's.

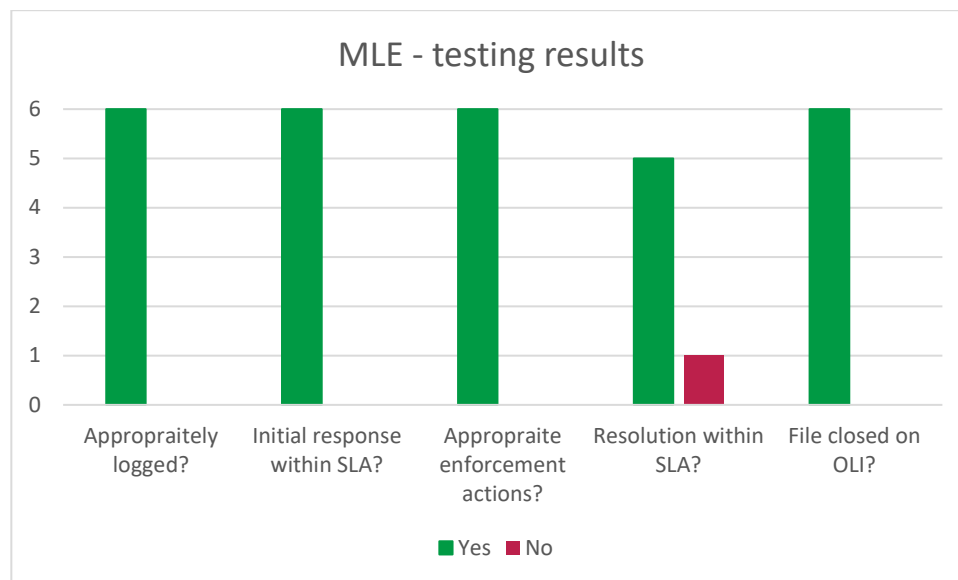
## Appendix D: Municipal Law Enforcement – Testing results

In this Appendix we have summarized the results of our sample testing of the key controls identified in Appendix C. We have also tested some key controls around the review and oversight of open complaints as highlighted in Appendix C.

### Enforcement actions – sample testing

We selected a sample of complaints which have been closed in the last 12 months on the OLI system. For each case we tested to confirm:

- The complaint was logged on the OLI system;
- The “initial response” was undertaken in-line with the SLA;
- Enforcement actions were carried out appropriately;
- The “case resolution” was undertaken in-line with the SLA; and
- The complaint was closed appropriately in OLI.



### KPMG observations

- ✓ In all six cases the complaint had been appropriately logged and the initial response undertaken within the SLA timeframes.
- ✓ In all six cases appropriate enforcement actions were taken. This included issuing AMP's where appropriate and undertaking other relevant inspections and enforcement actions.



- ✓ In one case the case resolution date was 2 weeks past the SLA deadline. Upon review of the case, we identified that an additional follow up inspection was required which had to be arranged with the homeowner, which caused the delay. This is deemed acceptable and no recommendation has been raised.

### **Enforcement actions – further testing**

As part of our testing we reviewed a sample of open complaints with the Manager of MLE Services, specifically those long standing complaints, and assessed why they have not yet been resolved. At the time of the audit there were 392 active open files in OLI, 92 of which had passed the SLA dates of resolution. We selected a sample of files from these 92. Our findings were as follows:

Date complaint received	Appropriate reason for delay in resolution?
November 2017	Yes – This case was taken to legal and currently has revised timeframes in place which have not yet passed at the time of the audit.
January 2018	Yes – In this case a follow up inspection was required however the homeowner is away, and so an inspection has been scheduled within the next month.

These cases, amongst the other open cases, are reviewed by Supervisors on a bi-weekly basis. In 2017, 92% of all by-law enforcement files were resolved within the SLA deadlines, as per the 2017 Annual Report to Council. This figure was 91% in 2018 as per the 2018 Annual Report to Council. It is expected to remain fairly consistent for the 2019 calendar year.

### **OLI system**

MLE staff provided similar feedback on the OLI system as identified in Appendix B, especially around the limitations for reporting, communication between other Branches, and the system's inability to track progress of complaints easily. MLE are also due to implement "CityView" and, along with BPIS staff, will be participating in the implementation of the new system to ensure the true benefits are realized. The same timeframes for implementation apply.





## Appendix E: Inspection and Enforcement processes – Fire Services

We reviewed the inspection and enforcement processes within Fire Services with the Fire Prevention Captain and the Chief Fire Prevention Officer. The main acts enforced by Fire Services are the 2015 Fire Code and the 1997 Fire Prevention and Protection Act. Fire Services have a total of 10 staff who are responsible for inspection and enforcement.

The most common enforcement actions applied across Fire Services are through complaints/requests or scheduled annual inspections for vulnerable occupancy homes which are required by Provincial legislation. Residential and business license inspections are the majority of work for Fire Services as it relates to enforcement of the Fire Code. A business licensing inspection is not considered enforcement unless an Order is issued or charges are laid. Fire Services also enforce actions under the Building Code, details of which can be seen in Appendices C and D.

We have outlined below the processes and key controls for enforcement across Fire Services, focusing specifically on the two enforcement areas above.

### Fire Services Enforcement processes – complaints/requests

Process	Control	KPMG comments on design
Complaints or requests are received and logged in CRISYS, Fire Services' system to track enforcement actions.	The complaint date is recorded in CRISYS along with the nature of the complaint/request	<ul style="list-style-type: none"><li>✓ Complaints/requests are initially received by Service Oshawa and recorded in LAGAN, a system used by the City to log customer actions, including inspection and enforcement activities.</li><li>▪ CRISYS and LAGAN are not linked and so staff are required to manually add cases to CRISYS to action. Please refer to Appendix F for further information on the systems used within Fire Services</li></ul>

Process	Control	KPMG comments on design
Enforcement actions are carried out by Fire Services staff	Enforcement actions are undertaken in-line with internal service standards	<ul style="list-style-type: none"> <li>✓ Service standards have been implemented internally by Fire Services which outline the expected service deliverables around enforcement activities across Fire, such as timeframes for responding to complaints.</li> <li>✓ Enforcement actions usually involve a site visit/inspection to address the complaint.</li> <li>✓ A file in CRISYS is created and the enforcement actions are carried out. Details of this are recorded in CRISYS and the case closed once the complaint/request has been resolved.</li> </ul>
	Details of enforcement actions applied are recorded in CRISYS	
	The case is closed in CRISYS once actions have been carried out	
		<ul style="list-style-type: none"> <li>• There is currently no review of open cases in CRISYS, or a review of open cases in LAGAN to ensure that a file has been created in CRISYS. Please see Appendix F for further details. <b>(See Recommendation Two)</b></li> </ul>

Process	Control	KPMG comments on design
Enforcement activities are reported to Council on an annual basis	An annual report was presented to Council	<ul style="list-style-type: none"> <li>✓ We obtained a copy of the annual report for 2017 which was presented to Council in March 2018.</li> <li>✓ Items discussed include number of enforcement inspections undertaken, calls attended to, and types of fire incidents.</li> </ul>

#### Fire Services Enforcement processes – vulnerable occupants

Vulnerable Occupancy homes are inspected on an annual basis	<p>A spreadsheet of all vulnerable occupancy homes is maintained by the Fire Prevention Captain</p> <p>Inspections are undertaken in-line with the timeframes stipulated on the spreadsheet.</p>	<ul style="list-style-type: none"> <li>✓ Vulnerable occupancy homes are inspected in-line with the Ontario Fire Code. Items inspected include fire safety plan measures and fire protection equipment.</li> <li>✓ Prior and upcoming inspection due dates are recorded on the spreadsheet and tracked by the Fire Prevention Captain.</li> </ul>
↓	↓	↓
A file is created in CRISYS by Fire Staff and closed once the inspection is complete	The inspection is logged as completed in CRISYS and the file closed.	<ul style="list-style-type: none"> <li>✓ Details of the inspection are recorded in CRISYS along with any deficiencies if noted, and these are followed up by Fire staff.</li> <li>✓ Once the inspection has been completed and any deficiencies resolved,</li> </ul>



Process	Control	KPMG comments on design
		the file is closed in CRISYS.



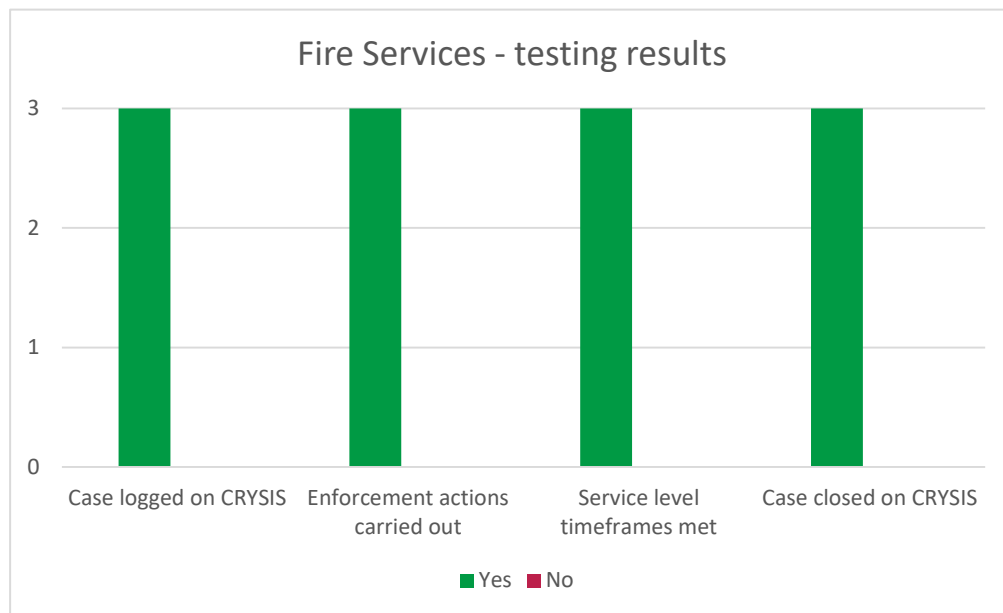
## Appendix F: Fire Services – Enforcement testing

In this Appendix we have summarized the results of our sample testing of the key controls identified in Appendix E.

### Enforcement actions – complaints/requests sample testing

We have selected a sample of requests/complaints received by Fire Services. For each case we tested to confirm:

- The case was logged in CRISIS;
- Enforcement actions were carried out appropriately and recorded in CRISIS;
- The service level timeframes were adhered to; and
- The case was completed and closed in CRISIS.



### KPMG observations

- ✓ In all three cases the complaint had been appropriately logged on CRYSIS. We also confirmed that enforcement action had been carried out as required by FS.

Overall, we noted a lack of a clear audit trail in enforcement actions. While we could confirm actions had been carried out, case files were not always clear on the actions undertaken and did not always include clear records of the inspections undertaken and any other communications. We also noted that Fire Prevention Inspection Record forms had not been adequately filled in, including information such as the number of units &



storeys of the property, owner information and inspectors comments. While these had been completed to some extent, information was not sufficiently detailed to gain a clear picture of the enforcement actions carried out and any subsequent actions/follow-ups required.

**(See Recommendation Two)**

### **Vulnerable occupancy inspections**

We reviewed the spreadsheet maintained by the Fire Prevention Captain and assessed the current status of the inspections undertaken on vulnerable occupancies.

A sample vulnerable occupancy was tested and we confirmed that an annual inspection had been undertaken. Notes in CRISYS were clear and a follow-up inspection was also undertaken and recorded in CRISYS. We also confirmed that all occupancies on the spreadsheet had been inspected where required in the 2018 calendar year.

### **Monitoring actions – review of open cases in CRISYS and LAGAN**

There is currently no review of open cases in CRISYS to ensure actions are being addressed appropriately. In addition, there is no assessment of open cases on LAGAN to confirm that a case has been open in CRISYS. We identified a number of outstanding cases in LAGAN which had not been resolved, dating back to May 2018.

A large number of current open cases in CRISYS may relate to cases which have been resolved but not formally closed. A periodic review of open cases will help the City identify where further actions are needed. Staff should be reminded of the need to close cases once they are resolved, which will help the City identify and review open cases where further action or follow up is required.

**(See Recommendation Two)**

### **Further observations**

During the course of our review we also noted the following observations regarding Fire Services role under the Building Code and the systems used within Fire Services.

#### **Fire services role in building permit applications**

We reviewed and discussed the role of Fire Services under the Building Code Act, and discussed the concerns, issues and possible solutions identified by BPIS (see Appendix B) with the Fire Chief and Deputy Fire Chief. As stated in Appendix B, there are opportunities to combine resources and enhance enforcement activities across the City to help reduce costs. **(See Recommendation One)**



### Systems used within Fire Services

Fire Services use both the OLI and CRISYS systems to record and track inspection and enforcement activities. However, unlike the OLI system used by BPIS and MLE, the CRISYS system used by Fire is not linked to LAGAN, and so any requests received from Service Oshawa have to be manually entered into CRISYS. During our discussions with FS, we noted similar limitations with the CRISYS system as those with OLI.

Fire Services are also due to implement "CityView" which will replace OLI, and, along with BPIS and MLE, have staff involved in the implementation to ensure the true benefits are realized. The same timeframes for implementation apply.



## Appendix G: Staff Involvement and Documents Reviewed

We undertook interviews and obtained feedback during Q2 and Q3 2018 with key stakeholders to inform this work, including:

Name	Title
Tracy Adams	Commissioner, Corporate Services
Ron Diskey	Commissioner, Community Services
Paul Ralph	Commissioner, Development Services
Mike Leonard	Chief Building Official
Jerry Conlin	Director, Municipal Law Enforcement and Licensing Services
Derrick Clark	Fire Chief
Andy Banga	Chief Fire Prevention Officer
Catherine Beaver	Fire Prevention Captain
Stephen Barkwell	Deputy Fire Chief
Kwan Lo	Manager, Building Permit Services
Kevin Feagan	Manager, Municipal Law Enforcement Services
Brenda Jeffs	Manager, Customer Services

We received the following documentation over the course of fieldwork:

- Policies, procedures and template inspection forms/records relating to enforcement activity
- Extracts of OLI and CRISYS and supporting documentation for a sample of inspections and enforcement for Fire, Buildings and MLE
- Annual reports to Council on enforcement activity
- Internal monitoring reports of enforcement, including reports reviewing applications, outstanding inspections and complaints (both open and closed)
- Relevant acts and by-laws outlining enforcement activity across the City including:
  - City of Oshawa Building By-Law
  - By-Laws related to Property, Park and Animal related enforcement activities
  - Ontario Fire Code and Building Code Act