

Waterloo Regional Police Service

Neighbourhood Policing Staffing & Workload Review

Final Report

January 18, 2023



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KPMG have indicated within this report the sources of the information provided. We have not sought to independently verify those sources unless otherwise noted within the report.

KPMG is under no obligation in any circumstance to update this report, in either oral or written form, for events occurring after the report has been issued in final form.



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01 Executive Summary

Waterloo Regional Police Service | Neighbourhood Policing Staffing & Workload Review **Executive Summary**

The Waterloo Regional Police Service (the "Service" or "WRPS") engaged KPMG to complete a review of the Service's neighbourhood policing deployment model, staffing needs, and patrol workloads for service delivery. The Review was completed between August and December 2022.

The Review engaged internal and community stakeholders, reviewed occurrence and response data, and researched the metrics and practices of three comparable regional polices services in Ontario. From this input, the Review identified opportunities and refined them with the WRPS project team, and developed recommendations intended to improve the overall effectiveness of neighbourhood policing in the region.

The Waterloo Region has experienced significant population growth and growth in crime from 2016 – 2021. The Service continually strives to improve its operational efficiency. In response to population growth, the Service has implemented a number of initiatives to alleviate burden on front-line administration. However, front-line policing resources have not kept pace with the growth in population served and a corresponding increase in the total service time within the region. Community stakeholders expressed a strong desire for more proactive policing, and many police officers feel they are not able to manage call volumes during their expected working hours. The Review found that WRPS has proportionately fewer sworn officers than other comparable regional police services.

The Review recommends that the Service consider an increase in its front-line officer complement to help address high officer case loads and declining clearance rates, and that it establish a mechanism for on-going and sustainable increases in line with demand for services.

In addition, the Review identified opportunities for the Service to make the most effective use of its investment in front-line officers. These opportunities include diverting calls away from front-line response, augmenting sworn officers with lower-cost civilian staff, and more proactively managing the effort of front-line officers. The Review also observed that community stakeholders, particularly in rural communities, wanted more police presence and clarity in how their communities can work with the Service to address crime. Finally, the Review noted that the allocation of officers across divisions does not appear to promote equitable workloads, and may be impacting travel times to some rural communities.

In addition to the need for more front-line officers, the Review recommends the following measures to improve the effectiveness of policing in the future:

- Improve data quality and performance measurement to support a greater focus on more proactive and accountable policing.
- Increase the efficiency and effectiveness of front-line officers by diverting more low-priority calls away from the front-line to the Field Support Unit, increasing the use of civilians to support activities such as report taking, and consider the future use of Special Constables for lower-risk activities such as traffic management and securing crime scenes.
- Improve the operational deployment of officers by realigning division boundaries to approximate municipal boundaries, reallocating staff across divisions, and deploying constables to zones based on current service times.
- Increase rural responsiveness by establishing a dedicated Rural Sergeant, relocating two officers per shift from Northern Division to Central Division to serve the two rural zones closest to Central Division, and working with Townships to review access to facilities for police use.



Waterloo Regional Police Service | Neighbourhood Policing Staffing & Workload Review **Executive Summary**

The Review did not identify specific gaps or inefficiencies related to legislation, regulation, and the policies and procedures of the police services in Ontario. However, the Review did identify significant increases in the workload of front-line officers over the past four years, which could represent a risk to the Service's ability to provide consistent, and timely responses and to provide for the safety and security of the community as per the Principles of the Ontario Police Services Act. For example:

- WRPS receives a high number of calls for service related to mental health crisis. While WRPS is fully supportive of increasing the social networks to support people in crisis, this is a slow process and in the meantime the community must feel safe.
- The complexities of crime and the ever-evolving technology available to criminals means WRPS must continue to adapt and grow to meet these challenges. The training necessary to address these issues means members must be away from their work which can lead to gaps in service.
- The gap in 24/7 access to victims services and other social supports means WRPS is being tasked more and more with fulfilling this need. Providing compassionate services to victims of crime is a time consuming but essential aspect of providing adequate and effective police services.

The Service is looking to balance its resource capabilities to meet community needs and expectations by implementing solutions to achieve targeted outcomes. Current service levels fall short of community expectations in terms of proactively policing to reduce crime. Further, there is a risk that service levels could decline if the officer complement does not increase to line with Regional growth and increases in crime.



02 Project Overview

Waterloo Regional Police Service | Neighbourhood Policing Staffing & Workload Review **Project Overview**



Project Objectives

The Waterloo Regional Police Service (the "Service" or "WRPS") engaged KPMG to complete a review of the Service's neighbourhood policing deployment model, staffing needs, and patrol workloads for service delivery.

The Service's project objectives are:

- 1. Improve the efficiency and effectiveness of the current structure with respect to policing best practice.
- 2. Identify gaps within the current model that may be contributing to inefficiencies.
- 3. Identify potential risks to the Service posed by any gaps or inefficiencies related to legislation, regulation, and the policies / procedures of the police services in Ontario.
- 4. Provide a cost benefit analysis of the resulting recommendation.
- 5. Provide timelines and implementation roadmap.



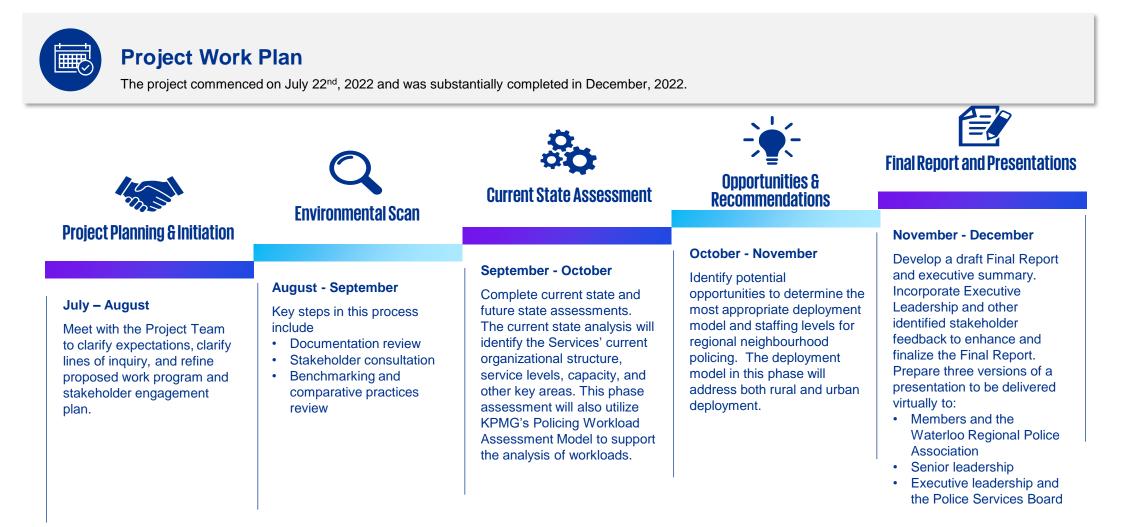
Project Drivers

The Service identified two key areas for improvement.

- **Continuous Improvement:** WRPS is committed to strengthening its public safety and the quality of life by identifying new opportunities for improving its service delivery model, implementing efficiencies, modernization and creating long-term service deliver plans for front-line patrol.
- Staffing Needs: WRPS is looking to reassess its existing patrol workloads, staffing needs, and neighbourhood police patrolling deployment models for service delivery, with a particular focus on division/zone boundaries and workload allocation.



Waterloo Regional Police Service | Neighbourhood Policing Staffing & Workload Review **Project Overview**





Waterloo Regional Police Service | Neighbourhood Policing Staffing & Workload Review **Project Overview**

Stakeholders Engaged

Service leadership, members of the Board, front-line officers, and community groups were engaged to obtain an understanding of the current deployment model and service levels as well as perspectives on opportunities to improved the Neighbourhood Policing. Below is a summary of the stakeholder engagement performed.



WRPS Leadership Interviews

- 1. Acting Chief, Permanent Staff Superintendent
- 2. Deputy Chief, Neighbourhood Policing and Investigations
- 3. Deputy Chief, Administration and Member Services
- 4. Superintendent of Patrol
- 5. Inspector of Patrol, North Division
- 6. Inspector of Patrol, Central Division
- 7. Inspector of Patrol, South Division
- 8. Inspector of Community Engagement and Wellbeing
- 9. Superintendent of Operational Support
- 10. President of the Waterloo Regional Police Association
- 11. Police Services Board Representatives



Front-line Officers

- 1. Front-Line Officers, North Division
- 2. Front-Line Officers, Central Division
- 3. Front-Line Officers, South Division

Front-line Officer Survey

KPMG also issued an online survey open to all WRPS front-line officers.



Community Groups

- 1. City of Cambridge
- 2. City of Kitchener
- 3. City of Waterloo
- 4. Townships of North Dumfries, Wilmot, Wellesley and Woolwich



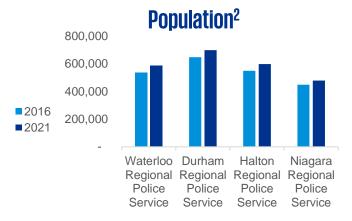
03 Understanding the Challenges

High Growth; High Crime

The Waterloo Region community is the fastest growing community when compared to the communities served by three comparable regional police services. In the past five years, the population of the region increased 9.7%. The population also increased in diversity. In the same five years, there was a 59% increase in visible minorities.

Waterloo Region's crime severity index has increased 31.3% over the past five years and is now 17.3 points higher than the next closest of its comparators.

Demographic and social-economic changes are driving changes in service demand. Stakeholders identified that more communication and coordination with community partners could help the Service better meet both urban and rural community service needs and expectations.

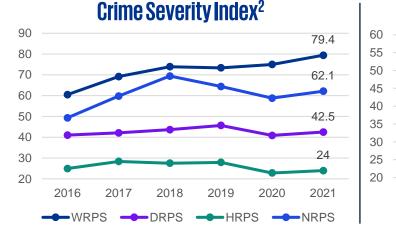


9.7%

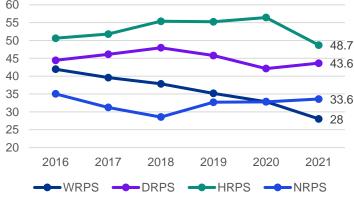
Waterloo Region's population growth, from 2016 to 2021, is the highest amongst the selected comparators.

59,035 (59%)²

The number of additional visible minority individuals within the Waterloo Region in 2021 and the percentage change from 2016.



Weighted Clearance Rate²



Sources - (1) Police Service Annual Reports; (2) StatsCan; (3) Municipality FIR

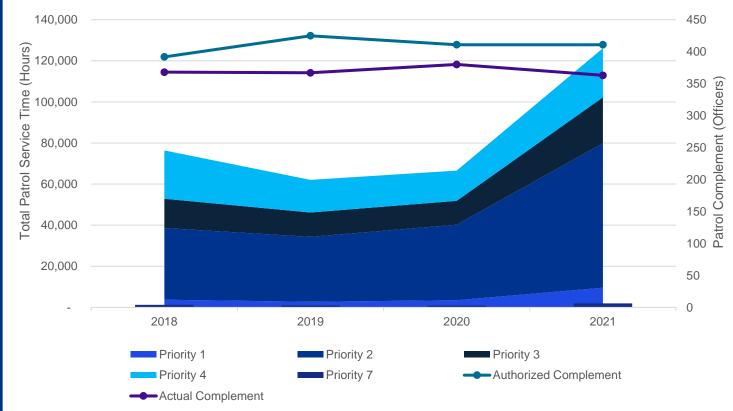


Increase in Workload

The growth experienced in the Region and relatively high crime rates appear to have driven an increase in total workload for front-line policing. The total time that officers spent on calls for service increased in 2021. Much of the growth in workload is driven by priority one and two calls, for which the Service has fewer response alternatives. Note that data for 2020 may have been suppressed by the impact of the pandemic.

The authorized complement of patrol officers did not increase in 2021 and the actual complement decreased from a high in 2020.

Total Service Time by Call Priority and Patrol Complement 2018 - 2021



Sources – KPMG analysis based on unit dispatch and officer complement data provided by WRPS.



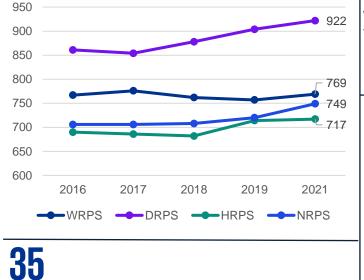
Limited Growth in Officers

Despite the increase in population, the officer complement within the Service has not kept pace. Year-over-year budget approvals for staffing increases have not been consistent; some years had zero officer increases while in the most recent budget, the Service was authorized to hire 35 additional officers. The Service is still working to fill the new positions due to broader challenges within policing to recruit.

The WRPS percentage change in the number of officers between 2016 and 2021 is 0.26%, the lowest amongst the comparator group. The Service also has the second lowest officer per capita, with 1.29 officers per 1000 residents.

The Service has found that meeting minimum staffing levels, as defined by the collective agreement, has been a challenge.

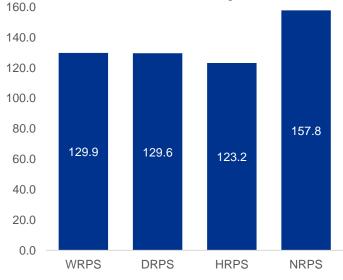
Number of Officers



0.26%

WRPS' officer growth, from 2016 to 2021, is the lowest amongst the selected comparators.

2021 Authorized Officers per 100,000



The number of additional authorized officers WRPS' is currently recruiting.

Sources - (1) Police Service Annual Reports, (2) 2021, 2016 StatsCan Census



Low Officer Complement relative to Demand

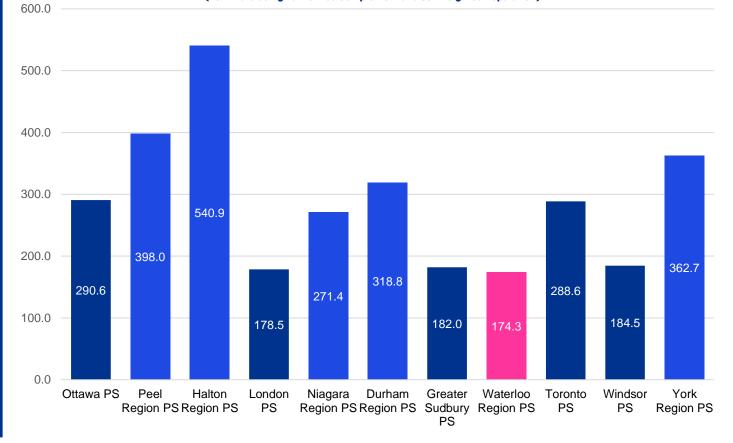
A ratio of the number of officers to population served is often used when comparing officer complements of different police services. This metric on its own does not account for the crime rate and its severity.

The number of officers for a population weighted by the Crime Severity Index (authorized officers / (population in 100,000s x CSI/100)) factors in the total population served, as well as the number and severity of crimes. A comparison using this metric of large municipal police services in Ontario is shown in the graph to the right. It is based on 2021 data and shows the ratio using authorized complements. CSI data excluding traffic incidents were not available for comparison.

The five regional services other than Waterloo have on average a much higher number of officers per weighted population. This may be attributable in part to the need to provide patrol coverage to a larger area. In contrast, there may be some efficiencies patrolling denselypopulated areas.

The graph comparison implies that WRPS is significantly under-resourced compared with its peers, particularly when compared with the other regional services.

Officer Complement to Measure of Relative Demand (2021 Data using Authorized Complement and CSI Weighted Population)



Source: KPMG analysis based on Statistics Canada data. Data for Hamilton was not available.



Budget Pressures Necessitate Focus on Service Efficiency

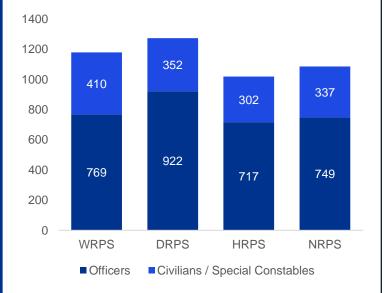
WRPS has been able to replace some positions previously filled by sworn officers with civilians (e.g., front counter and Communications Centre). Civilians are generally less costly than officers in compensation, outfitting and training.

WRPS has a larger civilian workforce than its comparators. Currently, WRPS employs 410 civilians. This is 58 more than the closest comparator. Since 2016, WRPS has increased its civilian complement by 14.5%, the second most amongst selected comparators. In part, WRPS comparatively large civilian complement is attributable to the Service's provision of shared services to other police and fire services (e.g., PRIDE, Fire CAD).

WRPS has seen the second highest increase in budget compared to the other Services. In the past five years, WRPS' budget increased by approximately 24% or \$39.7 million. Of this increase, approximately \$33.7 million is attributed to increases in salaries, wages, and employee benefits. Contracted services also increased significantly in part due to costs associated with services delivered to other police and fire services.

The Service is looking for approaches to front-line policing that enhances service quality and reduces officer caseload. Consistency in dispatch and call response practices are concerns raised by internal and external stakeholders.

Service Complement¹



410 (14.5%)

The number of civilians WRPS employed in 2021 and the percentage change from 2016. *This is 58 civilians more than the next largest selected comparator (DRPS).*

Police Budgets²



Police Budgets per Capita (2021)^{1,2}



Sources - (1) StatsCan, (2) Municipality FIR

250

Resource Deployment and Officer Workload

The average caseload per officer in WRPS is higher than its comparators. Within the service, calls for service are unevenly distributed across the three divisions.

In addition, internal and community stakeholders raised concerns related to travel time and visibility in rural communities, operational coordination close to the divisional boundary along Victoria Street, and a lack of clarity for municipalities that cross divisional boundaries. Travel time for priority 1 and 2 calls by zone are shown in graphs to the right. Travel time is most important for these two, urgent priority levels.

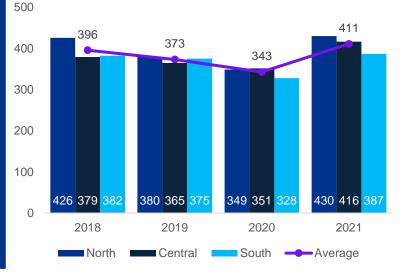
The Service is moving towards a "One Region" deployment approach with the launch of the Real-Time Operations Centre (RTOC). The formation of the Community Safety and Wellbeing Branch is intended to support community policing; however, its mandate is still not clear to the broader organization. These changes are significant and will require the organization to accept the changes and realize their benefits.

Sources – (1) Police Service Annual Reports, (2) 2021, 2016 StatsCan Census, (3) Call data provided by WRPS

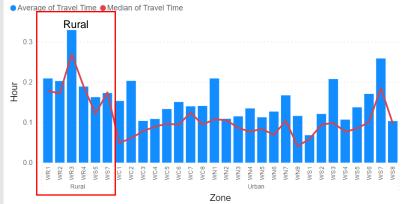




Calls for Service per Officer across Divisions³



Travel Time for Priority 1 by Status and Zone (2021)



Travel Time for Priority 2 by Status and Zone (2021)



KPMG

04 Recommendations Sumary

Based on the analysis performed, KPMG identified opportunities and developed recommendations. Recommendations address how to better manage workloads, perform more proactive policing, improve relationships with communities, and improve the effectiveness of the front-line policing. The recommendations are summarized below.

Top Recommendations

The Review identified one recommendation that could have a material impact on crime, clearance rates, and community relations within the Region:

1. Consider increasing total front-line officers to address population growth and help reduce the crime severity index and increase clearance rates. Establish target staffing levels that account for officers on leave (Active Staffing Model) using budget surpluses for staffing.

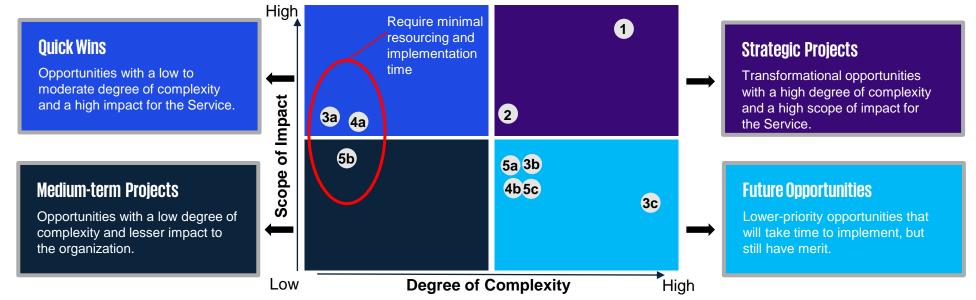
In addition, WRPS should consider measures to achieve the greatest value from its investment in front-line policing resources. These measures are reflected in the following recommendations:

- 2. Promote proactive policing and improve staffing decisions through performance management of front-line policing and improved data quality.
- 3. Increase the efficient and effective use of front-line uniformed officers by:
 - a. Diverting calls away from front-line officers by reviewing call response policies and expanding the Field Support Unit (FSU) mandate (e.g., FSU to address all store theft calls).
 - b. Supporting the FSU with a civilianized call centre to increase the consistency of FSU's capacity and efficiency.
 - c. Reducing front-line officers' workload by using Special Constables for activities, such as taking reports on low-priority calls, securing crime scenes, and managing traffic.
- 4. Improve the operational deployment of officers on patrol by:
 - a. Rebalancing divisional and zonal staffing levels.
 - b. Realigning divisional boundaries to more closely approximate municipal boundaries while avoiding high-incident areas (e.g., Victoria Street in Kitchener).
- 5. Increase rural responsiveness by:
 - a. Establishing a designated Rural Sergeant to act as a main community engagement point of contact with the Townships.
 - b. Relocating two rural officers per shift from Northern Division to Central Division to serve the two rural zones closest to Central Division.
 - c. Working with Townships to identify suitable work spaces in municipal facilities for WRPS officers.

For each of these recommendations, the remainder of this section provides a prioritization based on an assessment of their potential impact and complexity, an estimate of total resource impacts, and a summary of the benefits and estimated costs and. Recommendations are described more fully in the next section.



The recommendations are mapped for *complexity vs. scope of impact* to help prioritize activities. The prioritization categories and criteria are outlined below. Three recommendations would require minimal resources and could be initiated in the short term.



| Scope of Impact | | | Degree of Complexity | | |
|-----------------|---|--------------------|---|--|--|
| Rating | Description | Rating Description | | | |
| Low | Minor operational impact. | Low | Could be implemented within 6 months and without dedicated resources or significant budget. | | |
| Medium | Impact that provides significant benefit to one area or aspect of the organization. | Medium | Could be implemented in 6 – 18 months, and would require a dedicated resource and significant budget. | | |
| High | Impact that creates strategic change across the organization. | High | Could require more than 18 months to implement and would represent a substantive project within the organization. | | |



Waterloo Regional Police Service | Neighbourhood Policing Staffing & Workload Review Estimated Resource Impacts of Recommendations

The estimated resourcing impacts of the recommendations are summarized in the table below.

| Recommendation Reference | Type of Hire | Additional Resources Estimated (FTEs) | Assumptions | |
|-----------------------------|---|--|---|--|
| | | | | |
| 1 | Constables | 45 - 50 FTEs | These additional resources are based on an analysis of the comparators that found to match HRPS' and NRPS' Calls for Service per Officer, the WRPS could increase their authorized complement by 50-55 sworn officers focused on patrol. This number would include approximately 5 additional sergeants shown separately. Note that these officers are in addition to the current authorized complement. WRPS is challenged to attain its authorized strength. A separate recommendation proposes an option to help address the difference between the authorized complement and the actual number of police officers. | |
| 1 | Sergeants | 5 FTEs | Additional Sergeants would be required to maintain appropriate supervisory levels in response to an increase in front-line officers overall. | |
| Зb | Civilian Call Takers and Civilian Supervisor | 9 – 11 FTEs | To support the FSU with an effective civilianized call centre, it would require two call takers on a 12-hour coverage schedule. To operationalize a call centre on this schedule, the Service would require eight to ten call takers and one civilian supervisor. | |
| 5a | Rural Sergeant | 1 FTE | To increase rural responsiveness, the Service should consider implementing a Rural Sergeant to act as the main community engagement point of contact with the Townships. | |
| | Total | 60 – 67 FTEs | | |



Waterloo Regional Police Service | Neighbourhood Policing Staffing & Workload Review Summary of Benefits and Estimates of Costs

The following table summarizes the primary benefits of each recommendation, and were applicable, provides an estimate of potential implementation and on-going costs. Appendix A provides the significant assumptions used to estimate costs.

| Recommendation | Primary Benefits | Estimated Implementation Costs (000s) | Estimated On- going Costs (000s) | Notes |
|---|--|---|--|---|
| 1. Consider increasing total front-line officers to address population growth and help reduce the crime severity index and increase clearance rates. Establish target staffing levels that account for officers on leave (Active Staffing Model) using budget surpluses for staffing. | Help address increasing crime rates, decreasing clearance rates Help address significant increase in officer workload Help meet patrol shift minimums without the use of overtime Increase capacity for proactive policing | \$5,500 - \$6,200 | \$8,200 - \$9,100 | Implementation costs include recruit training, patrol vehicles and officer equipment Ongoing costs include salary and benefits, training, vehicle operations and on-going training |
| 2. Promote proactive policing and improve staffing decisions through performance management of front-line policing and improved data quality. | Increase accountability of officers for productivity Increase focus on proactive activities Obtain data to support workload analysis and resource decisions | NA | NA | Requires refinements and in processes and data collection. Assumed to be implemented using internal resources. |
| 3. Increase the efficient and effective use of front-line uniformed officers by: a. Diverting calls away from front-line officers by reviewing call response policies and expanding the Field Support Unit (FSU) mandate (e.g., FSU to address all store theft calls). | Reduce workload of front-line officers using capacity of accommodated officers Focus front-line officers on calls that require use of force and physical presence, and proactive policing Eliminate travel time for calls not requiring on-site presence | NA | NA | Requires refinements in processes. Assumed to be implemented using internal resources. |



Waterloo Regional Police Service | Neighbourhood Policing Staffing & Workload Review Summary of Benefits and Estimates of Costs

...continued

| Recommendation | Primary Benefits | Estimated Implementation Costs (000s) | Estimated On- going Costs (000s) | Notes |
|---|--|---|--|---|
| b. Supporting the FSU with a civilianized call centre to increase the consistency of FSU's capacity and efficiency. | More timely response to people calling the police with an expected outcome of increased levels of trust Increases FSU and front-line officers by diverting calls that require a report that cannot be submitted on line. Reduces some officer stress by reducing call backlogs | \$400 | \$1,000 - \$1,100 | Implementation costs include initial training and communication work stations Ongoing costs include salaries and benefits, and additional software licenses |
| c. Reducing front-line officers' workload by using Special Constables for activities, such as taking reports on low-priority calls, securing crime scenes, and managing traffic. | Makes use of less costly resources (considering salary differential and different training requirements) to perform activities currently performed by front-line officers May support recruiting efforts | NA | NA | Recommendation contemplates obtaining approval for special constable authorities. This would be undertaken with internal resources. Savings associated with the recommendation would offset future hiring requirements for constables. |
| 4. Improve the operational deployment of officers on patrol by:a. Rebalancing divisional and zonal staffing levels. | Address some discrepancies in workload across divisions Locate officers in zones with higher call volume to increase presence and response times | NA | NA | • Implementation would largely involve changes to processes and system data. This would be undertaken with internal resources. |
| b. Realigning divisional boundaries to more closely approximate municipal boundaries while avoiding high-incident areas (e.g., Victoria Street in Kitchener). | Improve communications and collaboration with municipalities Provide some operational benefit in high call areas along divisional boundaries | NA | NA | • Implementation would largely involve changes to processes and system data. This would be undertaken with internal resources. |

Continued...

Waterloo Regional Police Service | Neighbourhood Policing Staffing & Workload Review Summary of Benefits and Estimates of Costs

...continued

| Recommendation | Primary Benefits | Estimated Implementation Costs (000s) | Estimated On- going Costs (000s) | Notes |
|---|--|---|--|---|
| Increase rural responsiveness by: a. Establishing a designated Rural Sergeant to act as a main community engagement point of contact with the Townships. | Improve relationships and collaboration with the rural communities Reinforce front-line focus on rural policing priorities | \$75 | \$200 | Implementation costs include officer equipment and vehicle Ongoing costs include officer salary, benefits, training and vehicle operations |
| b. Relocating two rural officers per shift from Northern Division to Central Division to serve the two rural zones closest to Central Division | Reduce travel time to rural calls and increase officer time in communities | NA | NA | Implementation would largely involve changes to processes and system data. This would be undertaken with internal resources. |
| c. Working with Townships to identify suitable work spaces in municipal facilities for WRPS officers. | Increase officer presence in and around community hubs Provide officers with suitable locations to perform work and take breaks | NA | NA | Facility space would be provided by the municipalities Implementation would require effort from internal resources. |
| Total for All Recommendations | | \$5,975 - \$6,675 | \$9,400 - \$10,400 | |



05 Recommendations



Recommendation #1

Consider increasing total front-line officers to address population growth and help reduce the crime severity index and increase clearance rates, and consider establishing target staffing levels that account for officers on leave (Active Staffing Model) using budget surpluses for staffing.

Observation(s)

- Staffing levels did not increase materially between 2016 and 2021; population and crime rates increased, and clearance rates decreased during the same period. The Service was successful at obtaining funding for 35 more officers in 2022, but was not able to recruit, train and on-board the first of these officers until the latter half of 2022. The Service does not expect to be able to onboard the full complement of the new officers until 2023.
- Stakeholders indicated that the number of sworn officers on leave significantly impacts the Service's ability to meet the minimum and desired staffing levels on patrol.

Recommendation Detail

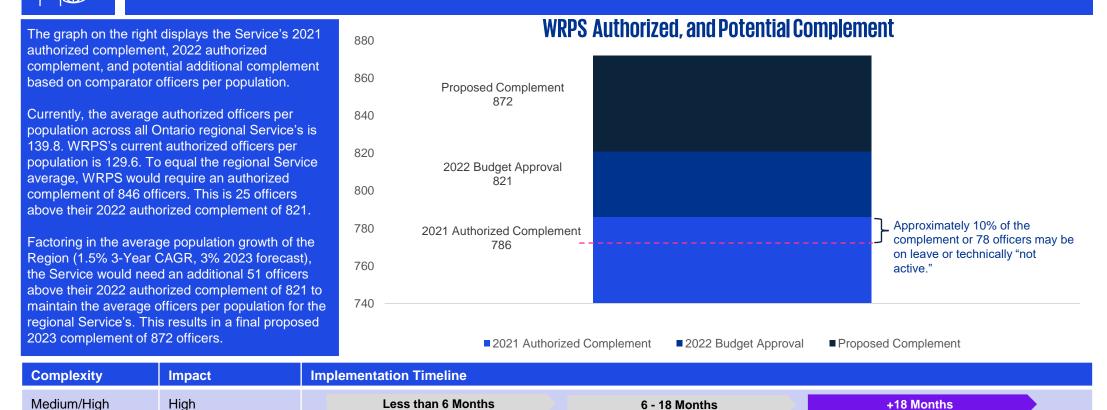
Consider increasing the number of sworn officers to manage call volumes, address rising crime, and increase clearance rates. Even after considering the additional officers approved in 2022, the Service may still require more sworn officers. A review of the Service's current staffing levels identified that:

- The Service could increase its current authorized complement by 50 to 55 officers to match the average authorized officer per capita level of other large regional police services in Ontario (adjusted to 2023). Population served is a proxy for service demand where more indicative statistics, such as crime rates or calls for service, are not reported in a consistent manner across jurisdictions.
- Given the significant increase in service time for front line policing (approximately 65% more service time in 2021 than 2018), the increase in officers should be allocated to
 patrol. The Service could consider options for deploying the additional patrol officers, such as allocating more officers to high demand zones, or establishing a foot/bike patrol in
 downtown cores.
- The Service should consider implementing an Active Staffing model to replace capacity loss associated with officers on leave. The Service had an average of \$3.3 million budget surplus from 2019 to 2021 related to staffing costs, largely due to savings from staff on leave, and delays in recruiting new staff. The Service's lowest budget surplus appeared in 2019 with a \$2.1 million surplus and the largest was in 2020 with a \$4.9 million surplus. Based on estimated 2023 salary costs, the lowest budget surplus seen in 2019 could equate to approximately 18 additional First Class Constables. This assumes the Service is not currently reinvesting the staffing surplus in other priority areas of the organization.
- The Service should work with the Police Services Board to agree upon a funding mechanism that reflects on-going increases in demand for policing. Due to recruiting
 challenges and the significant lead time required to onboard officers, the Service would also appreciate more consistency in annual budget increases to hire Ontario Police
 College graduates or experienced personnel from industry.

The graph on the next slide displays the Service's current active complement, authorized complement, and potential additional complement based on comparator call volumes.



Consider increasing total front-line officers to address population growth and help reduce the crime severity index and increase clearance rates. Establish target staffing levels that account for officers on leave (Active Staffing Model) using budget surpluses for staffing.







Recommendation #2

Promote proactive policing and improve staffing decisions through performance management of front-line policing and improved data quality.

Observation(s)

• Stakeholders indicated that the Service is not effectively utilizing data (from call in-take, dispatch, response, and case follow-up) to measure and manage performance, and to promote more proactive policing.

Recommendation Detail

The Service should increase its performance management of front-line officers to better understand allocation of effort, and to promote greater focus on proactive policing. This would require, in part, improved data quality to accurately track policing activities, particularly when not on a call, and could include generating calls internally related to proactive activities. Key considerations for this recommendation include:

- · Clarify what policing activities are considered as "proactive."
- · Use internally-generated calls to promote targeted proactive policing.
- Define key performance measures and associated thresholds/indicators.
- Measure and evaluate officer and overall front-line performance daily. Comparator police services are monitoring performance frequently.

Example opportunities for increased quality assurance and performance measurement are provided on the next page.

| Complexity | Impact | Implementation Timeline | | | |
|------------|--------|-------------------------|---------------|------------|--|
| Medium | Medium | Less than 6 Months | 6 - 18 Months | +18 Months | |





Recommendation #2

Promote proactive policing and improve staffing decisions through performance management of front-line policing and improved data quality.

The following example metrics and quality assurance steps relate only to helping the Service focus front-line police officers on policing priorities. The metrics and quality activities are intended to provide high-quality data to monitor performance and support resourcing decisions.

| Example Performance Meas | Example Performance Measures and Quality Assurance Activities related to Patrol Activity | | | | | | |
|--------------------------|--|---|--|--|--|--|--|
| Stage | Performance Measure | Quality Assurance | | | | | |
| Received calls | % of calls diverted or closed by Communications Centre Supervisor or Quality Assurance Officer (trend) Customer satisfaction through SPIDR (future consideration if implementation is expanded) Customer complaints | On-going audit of calls by Quality Assurance officer or qualified civilian Diverted calls reviewed by Quality Assurance officer or qualified civilian during shift | | | | | |
| Dispatched calls | % of calls diverted or closed by Sergeant or Staff Sergeant (target) Customer satisfaction through SPIDR (future consideration if implementation is expanded) Customer complaints | On-going monitoring of call response by Staff Sergeant All Sergeant/Staff Sergeant-diverted or closed calls reviewed by Inspector on daily report | | | | | |
| Proactive calls | Assigned proactive policing tasks (may be registered internally as a "call" for service in the dispatch system) completed per shift Calls for service time to shift time (including proactive calls) Customer satisfaction through SPIDR (future consideration if implementation is expanded) Customer complaints | Review of patrol activities and officer performance on every shift Review quality of investigations completed during a shift (e.g.,. by a sergeant with knowledge, skills and abilities, which may include an accommodated officer). | | | | | |





Recommendation #3a

- Increase the efficient and effective use of front-line sworn officers by:
- Diverting calls away from the front-line by reviewing call response policies and expanding FSU mandate (e.g., FSU to address all store theft calls).

Observation(s)

- During the current state assessment, stakeholders indicated that the Service can more effectively utilize FSU. FSU officers have the ability to investigate crimes and complete crown briefings. The call types that FSU handles are more limited, and often calls that require speaking with the public or collecting video evidence are handled by Patrol's front desk officers. There are backlogs in follow-ups and investigations due to front desk officers' workload.
- Stakeholders indicated that the Service could more effectively utilize FSU to divert calls from the front-line. Specifically, stakeholders indicated that FSU's skillsets are not
 properly utilized due to their limited mandate. It was identified that some calls outside of FSU's mandate are conducted by officers either at the front desk or in their car. FSU
 officers have the same skillsets as front-line officers to address calls that do not require officer presence.

Recommendation Detail

The Service should consider:

- Expanding the use of its on-line reporting capability to allow citizens to report more types of calls on line.
- Developing criteria for referral of calls away from front line patrol to increase consistency (i.e., suspect gone, no evidence to be collected, no injuries, no weapons, no continuing danger to the public).
- · Reviewing call response policies and increasing the mandate of FSU to ensure front-line officers are only responding to calls that require an officer presence at the scene.
- Assigning FSU to performing follow up on calls and low level investigations. Such activities could include building broadcasts, and providing advice on some landlord tenant complaints and neighbour disputes. This is meaningful work requiring an officer, and is not dependent on ongoing work.

| Complexity | Impact | Implementation Timeline | | | |
|------------|--------|-------------------------|---------------|------------|--|
| Low | Medium | Less than 6 Months | 6 - 18 Months | +18 Months | |





Recommendation #3b

Increase the efficient and effective use of front-line uniformed officers by

Supporting the FSU with a civilianized call centre to increase the consistency of FSU's capacity and efficiency.

Observation(s)

- Stakeholders indicated that the Service can more effectively utilize FSU. However, the FSU's workload would potentially increase along with the increased mandate. A portion of this increased mandate could be accommodated through the use of civilian staff.
- The intent of a call centre is to realign some of the responsibility of the administrative functions of front-line members and enable a more timely response to people calling the police with an expected outcome of increased levels of trust.
- Other police services have effectively used civilian call centres to take citizen reports as a means to reduce workload on front-line officers, and to increase citizen satisfaction.
- Call centres help to alleviate the need for mobile response with its embedded costs, address inconsistent fact-gathering as this is the call centre's sole focus, and support increased linkages to support pro-active policing.
- Officers expressed a concern that the backlog of calls creates significant stress. A call centre would be intended to help to alleviate some of the call volume directed to front-one officers.

| Recommendation Detail | | | | Assumptions | |
|--|---|--|----------------------------|-------------|---|
| FSU has a large cont | ingent of accommodated | ivilian call centre to support the FSU. The officers, and the capacity of the unit | Coverage required in hours | 8,870 | 12 hours per day, seven days a week, two operators |
| fluctuates. Some accommodated officers do not converse with the public as part of their accommodation. A civilian call centre could shorten the timeliness of engaging a complainant, which could increase their satisfaction with the Service. The call centre would take complainants' reports, reducing the associated effort required of FSU | | | Hours per FTE | 1,222 | 35 hours per week less 5 hours for breaks, four weeks for vacation, three weeks for training, two weeks for other leave |
| | officers, and enabling them more time to focus on clearing minor files. Key considerations associated with this recommendation include: Considering operating a call centre for up to 12 hours a day to cover peak call times. | | | | |
| Considering opera | | | | 8 | Coverage required divided by hours per FTE, rounded up to nearest full FTE |
| | • | s and one civilian supervisor. | Required supervisor FTE | 1 | |
| This recommendation could be piloted on a more limited scale with reduced operating hours and a single operator to gauge effectiveness and citizen uptake. | | Total required FTEs | 9 | | |
| Complexity | Impact | Implementation Timeline | | | |
| Medium | Medium | Less than 6 Months | 6 - 18 Months | | +18 Months |



Recommendation #3c

Increase the efficient and effective use of front-line uniformed officers by:

• Reducing front-line officers' workload by using Special Constables for activities, such as taking reports on low-priority calls, securing crime scenes, and managing traffic.

Observation(s)

- Stakeholder noted that the Service can more effectively utilize Special Constables. It was noted that front-line officers are performing duties that do note require a sworn officer. This includes responding to lower priority calls, responding to calls that do not require a use of force, and administrative tasks.
- Brantford Police Services successfully petitioned the government for increased Special Constable authorities. They requested "Peace Officer status / powers for Special Constables to provide law enforcement coverage primarily in the downtown, entertainment and education districts of the City of Brantford."¹ BPS requested that the "Peace Officers" have the powers to "respond to and investigate activity that may violate federal or provincial legislation, take statements from victims, witnesses and suspects; gather and preserve evidence; lay information, apprehend, arrest and release offenders; execute warrants; transport prisoners". The granted request gives the Service's Special Constables all the powers outlined in Appendix B.

Recommendation Detail

As the Service grows in future, it should consider apportioning some of its identified increase in sworn officers to be lower-cost Special Constables. Special Constables require less training and equipment, which increases their cost saving over sworn officers. Implementing this recommendation would first require increasing the authorized duties of Special Constables to enable them to take reports on low-priority calls, secure crime scenes, manage traffic, and other duties that the Service considers appropriate to divert from front-line officers.

| Complexity | Impact | Implementation Timeline | | | |
|------------|------------|-------------------------|---------------|------------|--|
| High | Low/Medium | Less than 6 Months | 6 - 18 Months | +18 Months | |

Sources - (1) Vetted appointment form provided by Brantford Police





Improve the operational deployment of officers on patrol by:Rebalancing divisional and zonal staffing levels.

Recommendation #4a

Recommendation Detail

To achieve the recommended zonal staffing levels, the Service should consider rebalancing constables assigned to each Division based on service time. The following table proposes a rebalancing of constables by division using authorized constables in 2022. This analysis does not consider the impacts of recommendation 4b (realignment of divisional boundaries) or recommendation 5b (the relocation of two officers from North Division to Central Division to serve the rural zones closest to Central).

| Zone | Demand (2022 Service Time) | % of Service Time Demand | Current Supply (2022 Authorized Complement) | Balancing based on Demand | Change in Constables |
|---------|----------------------------------|-----------------------------|---|------------------------------|-------------------------|
| North | 45,600 | 36% | 115 | 118 | 3 |
| Central | 47,000 | 37% | 119 | 121 | 2 |
| South | 35,400 | 28% | 96 | 91 | -5 |
| Total | 128,000 | | 330 | 330 | 0 |

Source: KPMG analysis based on data provide by WRPS





Recommendation #4b

Improve the operational deployment of officers on patrol by:

Realigning divisional boundaries to more closely approximate municipal boundaries while avoiding high-incident areas (e.g., Victoria Street in Kitchener).

Observation(s)

• Stakeholders noted that Victoria Street is a major street in the City of Kitchener and is the current divisional boundary separating the North and Central Divisions. It was identified that the current boundary line requires officers operating near the boundary to monitor two communication channels. As well, Municipal stakeholders noted that the current North and Central division boundary creates confusion when the municipalities try to communicate and collaborate with WRPS.

Recommendation Detail

To improve the operational deployment of officers on patrol, the Service should consider realigning divisional boundaries to more closely approximate municipal boundaries while avoiding high-incident areas (e.g., Victoria Street in Kitchener). To begin realigning the divisional boundaries, the Service should consider:

- · High-incident areas or sectors located near boundary lines, current service levels and associated Call for Service data.
- · Access and constraints (e.g. roadways, natural obstacles)

A realignment could help clarify which divisions are responsible for servicing the needs of high-incident areas and clarify communication channels with municipalities for local coordination and support.

The proposed boundary realignment would result in the reallocation of 184 North Division sectors to Central Division. A detailed list of the realigned zones is shown in Appendix C. This realignment would move approximately 14,000 calls for service from North Division to Central Division. This realignment would necessitate a rebalancing of patrol officers per division, such as is illustrated in the table on the following page.

| Complexity | Impact | Implementation Timeline | | | | | |
|------------|------------|-------------------------|---------------|------------|--|--|--|
| Medium | Low/Medium | Less than 6 Months | 6 - 18 Months | +18 Months | | | |





Recommendation #4b

Improve the operational deployment of officers on patrol by:

Realigning divisional boundaries to more closely approximate municipal boundaries while avoiding high-incident areas (e.g., Victoria Street in Kitchener).

Recommendation Detail

The tables below show an illustrative reallocation of officers to accommodate a change in divisional boundaries. The analysis assumes that the increase in officers in Central division could be accommodated with the existing facilities. Sergeants have been reallocated to maintain a supervisory ratio of approximately 10 constables per sergeant. The span of control for staff sergeants at Central Division would increase from approximately 3:1 to 4:1, which is generally acceptable.

| | Rank | North | Central | South | Net Change |
|------------------------------|--------------|-------|---------|-------|------------|
| Illustrative Change in | Sergeants | -4 | 4 | 0 | 0 |
| Patrol Officer Assignment | Constables | -35 | 36 | -1 | 0 |
| | Total Change | -39 | 40 | -1 | 0 |

| Illustrative Authorized Complement by Division | Rank | North | Central | South |
|---|------------|-------|---------|-------|
| | Sergeants | 8 | 16 | 8 |
| | Constables | 80 | 155 | 95 |

Source: KPMG analysis based on data provide by WRPS



Increase rural responsiveness by:



Recommendation #5a

• Establishing a designated Rural Sergeant to act as a main community engagement point of contact with the Townships.

Observation(s)

• Community groups expressed an interest in a more responsive policing for rural communities. They noted that rural communities are seeing development and intensification, and demographic changes, which they perceive are impacting community safety. They desire an increased police presence and a point person to liaise with about community priorities and issues.

Recommendation Detail

To increase rural responsiveness the Service should consider establishing a Rural Sergeant to act as main point of contact for community policing service needs and formally assigning officers to rural zones to strengthen the relationships between the Townships and the Service. The Rural Sergeant may report into the Community Safety and Wellbeing Branch; the rural patrol officers may be deployed out of the three divisions based on geographic proximity to reduce travel time.

This could allow the Service to more effectively engage with the rural communities by providing the Townships with a dedicated Sergeant that is able to liaise with them and discuss their priorities.

| Recommendation | Complexity | Impact | Implementation Timeline | | |
|----------------|------------|--------|-------------------------|---------------|------------|
| 4a | Medium | Medium | Less than 6 Months | 6 - 18 Months | +18 Months |



Waterloo Regional Police Service | Neighbourhood Policing Staffing & Workload Review **Recommendations**

Increase rural responsiveness by:



Recommendation #5b & 5c

b) Relocating two rural officers per shift from Northern Division to Central Division to serve the two rural zones closest to Central Division.c) Working with Townships to identify suitable work spaces in municipal facilities for WRPS officers.

Observation(s)

- Stakeholders indicated that there is an inconsistent understanding regarding the specifications of Municipal facilities intended for rural officer use. This inconsistent understanding has resulted in officers not using the spaces provided by Municipalities, which unintentionally reduces police visibility in rural communities.
- Police call travel times to some rural zones is higher than the zone average. Stakeholders within the Service indicated that officers deployed out of Central Division, instead of North Division, have shorter travel time responding to the Township of Wilmot calls.
- KPMG's analysis identified that the highest average travel time to rural areas is six (6) minutes longer than the average travel times of urban areas. This is due to the distance between the rural officers' deployment station and the rural areas.
- Community groups expressed an interest in more police visibility and an increased police presence within the Townships.

Recommendation Detail

Travel Times

The Service should consider relocating 1 to 2 rural officers per shift to Central Division to reduce travel times. This reallocation is based on the travel time from deployment division to zone.

Municipal Facilities

The Service should review existing space provided by the Townships against requirements for police reporting activities and breaks, and evaluate the location of facilities in relation to call locations and average response times. Then, the Service should work with communities to upgrade, or relocate space provided to officers for their use while in the Townships.

| Recommendation | Complexity | Impact | Implementation Timeline | | | | | | | |
|----------------|-------------|------------|-------------------------|---------------|------------|--|--|--|--|--|
| 5b | Low/Medium | Low/Medium | Less than 6 Months | 6 - 18 Months | +18 Months | | | | | |
| 5c | Medium/High | Low/Medium | Less than 6 Months | 6 - 18 Months | +18 Months | | | | | |



06 Additional Opportunities

Waterloo Regional Police Service | Neighbourhood Policing Staffing & Workload Review Additional Opportunities

Additional opportunities were identified that would require further research by the Service for feasibility and implementation. These opportunities are not expected to have impacts as significant as the recommendations presented. However, the Service is encouraged to consider their implementation as part of its on-going continuous improvement efforts.

| Challenge | Opportunity for Improvement | | | | | |
|---|---|--|--|--|--|--|
| Patrol officers are performing tasks that do not require a sworn officer Stakeholder indicated that sworn officers are responding to some calls and performing duties that could be performed by civilian staff. This includes lower priority calls, calls with unlikely use of force response required, and administrative tasks. | Consider encouraging more online reporting for calls for service. The Service can implement a ShopTheft Protocol, a program used by other jurisdictions for first time offenders. The LPO can stop offenders and generate their own report that is eventually added to the police data base without the need for officers. Consider clarifying the authority of Communications staff. Provide staff with the confidence to triage and divert calls from patrol to other groups (e.g., IMPACT, and FSU). In situations where calls are cleared, call takers can enter remarks that outline the reasonings for the cancelled call. The Service should use call management throughout the process to review calls after they are closed. This call management will help communications staff continue to develop skills and understand more effective triaging of calls. Seek funding opportunities to hire additional mental health workers in Communications. Consider utilizing accommodated sworn members to triage calls that are open beyond a prescribed amount of time. Consider directing traffic complaints from City Councilors to online reporting. This allows the complaints to be directly addressed by the Traffic team. | | | | | |
| The Community Safety and Wellbeing Branch's mandate is unclear The Community Safety and Wellbeing Branch was recently established to focus on outreach and crime prevention work. Stakeholders noted that the mandate for this Branch could be further clarified to support Patrol and local community needs, including a better understanding of their deployment model. | Clarify the Community Safety and Wellbeing Branch's role in regards to calls for service. Clearly communicate the clarified mandate to the entire Service and communities. The front-line should be aware of the branch's priorities, and communities should be aware of when and how to engage them. | | | | | |



Waterloo Regional Police Service | Neighbourhood Policing Staffing & Workload Review **Additional Opportunities**

Additional opportunities were identified that would require further research by the Service for feasibility and implementation.

| Challenge | Opportunity for Improvement |
|--|--|
| WRPS has a resource staffed at the University of Waterloo Stakeholders noted that there is a Staff Sergeant secondment at the University of Waterloo to assist with calls for service within the University. The Service is currently understaffed and unable to effectively respond to calls and perform proactive policing activities. There is no dedicated officer assigned to Wilfred Laurier University and rely on on-duty patrol officers to attend WLU calls. | Reassess the Staff Sergeant secondment at the University of Waterloo. The Service should determine the return on investment and identify if there is a different approach for responding to calls within the Universities. |
| Front-line officers are unable to address specialty calls that require additional investigation and higher demand Stakeholders noted that certain call types (i.e., school, mental health, and retail theft) require additional officer time compared to other calls for service. | WRPS is actively working to improve its relationships with the school boards. Should it have the opportunity, the Service has indicated that it would like to reestablish school resource officers. |
| Officers were removed from public schools Stakeholders noted that the public school board ended the School Resource Officer program. This program had previously assisted with the Service's ability to respond to calls within schools. | WRPS is actively working to improve its relationships with the school boards. Should it have the opportunity, the Service has indicated that it would like to reestablish school resource officers. |
| Community groups are expecting higher levels of engagement with officers Community groups indicated that the Service needs to adjust the current enforcement approaches for rural communities due to the development / intensification and demographic changes. The stakeholders noted that a consistent pool of officers engaged with the community would provide more assistance with the ongoing systemic issues (i.e., mental health and homelessness) when compared to an inconsistent pool of officers that do not have the time to establish connections within the community. | Ensure rural patrol officers understand that they are responsible for engaging with the community when not responding to calls for service. Consider implementing a downtown ambassador program. This program should include a mentorship program with the experienced officers and new recruits to facilitate the community relationships. |



Waterloo Regional Police Service | Neighbourhood Policing Staffing & Workload Review **Additional Opportunities**

Additional opportunities were identified that would require further research by the Service for feasibility and implementation.

| Challenge | Opportunity for Improvement |
|---|---|
| Tracking of calls with elevated trauma risk is limited KPMG did not identify any technology being used to monitor and report on the number of calls the Service responds to that have elevated risks for trauma. | Consider implementing IAPro to track the number of calls with elevated risk for trauma. This includes child injury / death, major collisions, officer injury, etc. This will be launched shortly. |
| Inconsistent information across divisions It was identified that there are some inconsistencies in the processes and information shared across divisions. This leads to officers having different understandings of the same situation. | 11. Consider utilizing technology for regional briefings. This includes the electronic dissemination of briefing information and posting assignments. This allows for officers to take briefings from their vehicles (i.e., get on the road faster) and ensures that officers across divisions receive identical information. |

07 Appendices

Appendix A: Cost Assumptions

Waterloo Regional Police Service | Neighbourhood Policing Staffing & Workload Review Significant Assumptions for Cost Estimates

The estimated costs provided in this document are based on a set of circumstances and assumptions as of January 2023. Significant assumptions are included below and must be read to interpret the information presented. Should events differ from the stated assumptions, actual results will differ from the financial projections and such differences may be material.

The financial information and assumptions contained herein has been prepared to assist readers in deciding whether or not to proceed with their own in-depth investigation and evaluation of the options presented, and does not purport to contain all the information readers may require. Readers should conduct their own investigation and analysis of the options.

KPMG accepts no responsibility or liability for loss or damages to any party as a result of decisions based on the information presented. Parties using this information assume all responsibility for any decisions made based on the information.

Significant Assumptions

The following unit costs were used in estimating the implementation and ongoing costs for recommendations:

| Assumption | Unit Cost | Source |
|--------------------------|------------|---|
| Constable Salary | \$115,000 | WRPS. Based on 2023 salary (base plus bonus) for first class constable with 8-15 years (step 2) |
| Sergeant Salary | \$133,000 | WRPS. Based on 2023 salary (base plus bonus) for Sergeant B5 with 16-22 years |
| Civilian Operator Salary | \$ 88,000 | WRPS. Based on 2023 salary for pay grade E (step 2). |
| Supervisor Salary | \$ 111,000 | WRPS. Based on 2023 salary for pay grade G (step 2). |
| Benefits | 28% | WRPS. Based on 2021 actual benefit costs to salaries |
| Recruit Training | \$40,000 | Model assumption based on current practice. |
| Annual Officer Training | \$5,000 | Model assumption based on current practice |
| Officer Kit | \$20,000 | Model assumption based on current for uniform, handgun, radio, laptop |
| Vehicle | \$55,000 | Model assumption based on current practice |
| Vehicle Operating | \$11,000 | 20% of capital cost to reflect maintenance and fuel |
| Communications Stations | \$115,000 | Model assumption based on knowledge of police services. |



Appendix B: Brantford Police Service **Special Constable** Powers

Waterloo Regional Police Service | Neighbourhood Policing Staffing & Workload Review Brantford Police Service – Special Constable Powers

The table below outlines the specific powers that the Brantford Police Service's Special Constables possess.

| Act | Sections | | | | | | |
|--------------------------------|--|--|--|--|--|--|--|
| Highway Traffic Act | 134(1)(2), 134.1(1). | | | | | | |
| Liquor License and Control Act | 31(1)(2), 42(2), 43(2), 48(1), 61(1a)(1bi)(1bii)(1c)(2), 62. | | | | | | |
| Youth Criminal Justice Act | 6(1), 7, 11, 12. | | | | | | |
| Mental Health Act | 17, 28(1)(2), 33. | | | | | | |
| Trespass to Property Act | 9(1)(2)(3), 10. | | | | | | |
| Others | 12(3), 14, 16(1)(2), 17(1)(2), 19. | | | | | | |



Appendix C: North Division Sectors Realigned to Central Division

Waterloo Regional Police Service | Neighbourhood Policing Staffing & Workload Review **Realigned Sectors**

The table below outlines the sectors that the Service can realign from North Division to Central Division.

| Sector Label | Current Zone | Sector Label | Current Zone | Sector Label | Current Zone | Sect Lab | | rent one | Sector Label | Current Zone | Sector Label | Current Zone | Sector Label | Current Zone |
|-----------------|-----------------|-----------------|-----------------|-----------------|-----------------|-------------|------|-------------|-----------------|-----------------|-----------------|-----------------|-----------------|-----------------|
| 7681 | WN2 | 7577 | WN2 | 7549 | WN2 | 752 | 22 W | N4 | 7092 | WN3 | 7064 | WN5 | 7016 | WN1 |
| 7665 | WN4 | 7576 | WN2 | 7548 | WN2 | 752 | 21 W | N4 | 7091 | WN3 | 7042 | WN1 | 7015 | WN1 |
| 7664 | WN4 | 7575 | WN2 | 7547 | WN2 | 752 | 20 W | N4 | 7090 | WN3 | 7041 | WN1 | 7014 | WN1 |
| 7663 | WN2 | 7574 | WN2 | 7546 | WN2 | 751 | 19 W | N4 | 7089 | WN3 | 7040 | WN1 | 7013 | WN1 |
| 7662 | WN2 | 7573 | WN2 | 7545 | WN2 | 751 | 18 W | N4 | 7088 | WN3 | 7039 | WN1 | 7012 | WN1 |
| 7661 | WN4 | 7572 | WN2 | 7544 | WN2 | 751 | 17 W | N4 | 7087 | WN1 | 7038 | WN1 | 7011 | WN1 |
| 7660 | WN4 | 7571 | WN2 | 7543 | WN2 | 713 | 30 W | N1 | 7086 | WN1 | 7037 | WN1 | 7010 | WN1 |
| 7659 | WN3 | 7570 | WN2 | 7542 | WN4 | 712 | 29 W | N1 | 7085 | WN1 | 7036 | WN1 | 7009 | WN1 |
| 7658 | WN3 | 7569 | WN2 | 7541 | WN4 | 712 | 28 W | N1 | 7084 | WN3 | 7035 | WN1 | 7007 | WN1 |
| 7657 | WN3 | 7568 | WN2 | 7540 | WN4 | 712 | 27 W | N1 | 7083 | WN3 | 7034 | WN1 | 7006 | WN1 |
| 7656 | WN3 | 7567 | WN6 | 7539 | WN4 | 712 | 26 W | N1 | 7082 | WN3 | 7033 | WN1 | 7005 | WN1 |
| 7655 | WN1 | 7566 | WN6 | 7538 | WN4 | 712 | | N1 | 7081 | WN3 | 7032 | WN1 | 7004 | WN1 |
| 7595 | WN2 | 7565 | WN6 | 7537 | WN4 | 712 | 24 W | N1 | 7080 | WN3 | 7031 | WN1 | 7003 | WN1 |
| 7594 | WN2 | 7564 | WN6 | 7536 | WN4 | 712 | | N1 | 7079 | WN3 | 7030 | WN1 | 7001 | WN1 |
| 7592 | WN2 | 7563 | WN2 | 7535 | WN4 | 712 | 22 W | N1 | 7078 | WN3 | 7029 | WN1 | 7000 | WN5 |
| 7591 | WN2 | 7561 | WN2 | 7534 | WN4 | 712 | | N1 | 7077 | WN3 | 7028 | WN1 | 106 | WN1 |
| 7590 | WN2 | 7560 | WN2 | 7533 | WN4 | 712 | | N1 | 7076 | WN3 | 7027 | WN1 | 103 | WN2 |
| 7589 | WN2 | 7559 | WN2 | 7532 | WN4 | 711 | | N1 | 7075 | WN3 | 7026 | WN1 | 40 | WN2 |
| 7588 | WN2 | 7558 | WN2 | 7531 | WN4 | 711 | | N1 | 7074 | WN3 | 7025 | WN1 | 38 | WN2 |
| 7587 | WN2 | 7557 | WN2 | 7530 | WN4 | 710 | | N3 | 7073 | WN3 | 7024 | WN1 | 9 | WN2 |
| 7586 | WN2 | 7556 | WN2 | 7529 | WN4 | 710 | | N3 | 7072 | WN3 | 7023 | WN1 | 8 | WN2 |
| 7585 | WN2 | 7555 | WN2 | 7528 | WN4 | 709 | | N1 | 7071 | WN3 | 7022 | WN1 | 2 | WN1 |
| 7583 | WN2 | 7554 | WN2 | 7527 | WN4 | 709 | | N1 | 7070 | WN5 | 7021 | WN1 | | |
| 7582 | WN2 | 7553 | WN2 | 7526 | WN4 | 709 | | N1 | 7068 | WN1 | 7020 | WN1 | | |
| 7581 | WN2 | 7552 | WN2 | 7525 | WN4 | 709 | | N3 | 7067 | WN1 | 7019 | WN1 | | |
| 7579 | WN2 | 7551 | WN2 | 7524 | WN4 | 709 | | N3 | 7066 | WN1 | 7018 | WN1 | | |
| 7578 | WN2 | 7550 | WN2 | 7523 | WN4 | 709 | 93 W | N3 | 7065 | WN1 | 7017 | WN1 | | |







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The information provided to us by Client was determined to be sound to support the analysis. Notwithstanding that determination, it is possible that the findings contained could change based on new or more complete information. KPMG reserves the right (but will be under no obligation) to review all calculations or analysis included or referred to and, if we consider necessary, to review our conclusions in light of any information existing at the document date which becomes known to us after that date. Analysis contained in this document includes financial projections. The projections are based on assumptions and data provided by Client. Significant assumptions are included in the document and must be read to interpret the information presented. As with any future-oriented financial information, projections will differ from actual results and such differences may be material. KPMG accepts no responsibility for loss or damages to any party as a result of decisions based on the information presented. Parties using this information assume all responsibility for any decisions made based on the information.

No reliance should be placed by Client on additional oral remarks provided during the presentation, unless these are confirmed in writing by KPMG.

KPMG have indicated within this report the sources of the information provided. We have not sought to independently verify those sources unless otherwise noted within the report.

KPMG is under no obligation in any circumstance to update this report, in either oral or written form, for events occurring after the report has been issued in final form.