



4.9.

MUNICIPAL BUILDING SECURITY MANAGEMENT

MARCH 22, 2019

SUMMARY OF THE AUDIT

OBJECTIVE

Ensure that security in Ville de Montréal (the City) buildings, as well as leased buildings or parts of buildings, is managed in accordance with statutes, regulations, policies and guidelines governing security management to ensure the security and integrity of facilities and users.

RESULTS

In 2014, the City adopted a Policy¹ entitled “Municipal building security”, which states that ensuring the security of people who use its facilities and protecting its critical infrastructure are strategic issues. Given the size of its building inventory, it is important that the City establish baselines for the level of security it wants to achieve. It also needs to establish a set of criteria to ensure operational compliance, protection of users and property and continuity of City operations. In this regard, we consider that improvements should be made in the following key areas:

- A review of the security status of municipal buildings and an action plan for the City-wide implementation of the Policy on Municipal building security must be submitted to the Direction générale;
- Efforts will need to be stepped up to clarify and communicate the roles and responsibilities of relevant stakeholders within the various business units;
- Standards defining the expected level of security in municipal buildings will need to be established;
- Security studies and programs responsive to the risks in each building will need to be developed;
- Emergency plans will have to be developed and updated for each City building;
- Operational processes and the interrelationships between stakeholders involved in managing the remote monitoring of buildings will need to be coordinated, and related technological tools will have to be upgraded;
- Controlled locksmithing management will have to be reassessed, and oversight and corrective measures must be implemented to address security breaches observed within the audited business units;
- Guard service operations will have to be reassessed to bring them into line with standards and guidelines previously established by the City;
- Targets and indicators will need to be established based on the policies adopted for assessing and reporting on the performance of security operations.

In addition to these results, we have formulated various recommendations for business units.

The details of these recommendations and our conclusion are outlined in our audit report, presented in the following pages.

Note that the business units have had the opportunity to formulate their comments, which appear after the audit report recommendations.

¹ The Policy [C-OG-SCARM-PA-14-001] – “Municipal building security” dated March 11, 2014 was revised in March 2016 [Ref.: C-OG-SGPI-PA-16-001].

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LIST OF ACRONYMS

BSP

Bureau de la sécurité privée

CDN-NDG

Côte-des-Neiges-Notre-Dame-de-Grâce
borough

COS

Centre opérationnel de sécurité

ERP

Emergency Response Plan

FSP

Fire Safety Plan

NFCC

National Fire Code of Canada

PGMUEM

Programme de gestion des mesures
d'urgence dans les édifices municipaux

SEP

Specific Emergency Plan

SGPI

Service de la gestion et de la planification
immobilière

SICOS

Système d'information du Centre
opérationnel de sécurité

SIM

Service de sécurité incendie de Montréal

1. BACKGROUND

The Ville de Montréal (the City) owns a large building inventory of just over 1,500 buildings including, libraries, sports centres, administrative offices, municipal workshops, production plants and water treatment plants.

Ensuring the security of the building inventory involves implementing and effectively managing a set of measures² (e.g., prevention, protection, response and emergency measures) to mitigate security risks (e.g., intrusion, theft, fire, violent events) that could have unfortunate or even disastrous effects on users' well-being or disrupt City operations.

Although there are no legal provisions that specifically govern “security management” within a building, the City must ensure that it organizes “security management” in accordance with specific legal provisions governing various aspects of security designed to protect building occupants. In particular:

- the *National Fire Code of Canada* (NFCC), which requires that a Fire Safety Plan (FSP) be developed for each building;
- the *Building Act*³, which requires that an evacuation plan and procedure be established or that compliant alarm systems be installed;
- the *Act respecting occupational health and safety*⁴ which requires buildings to be equipped to ensure the protection of workers;
- the *Criminal Code*⁵, under which actions can be brought against organizations in the event of a breach of their user health and safety obligations;
- the *Private Security Act*⁶, which requires that persons responsible for security activities hold a permit from the Bureau de la sécurité privée (BSP)⁷.

In 2006, following several building security events (e.g., Dawson College shooting in September 2006), an interdepartmental committee⁸ was established, at the request of the city manager, to conduct a study on security in City buildings across all boroughs and central departments. In particular, this study identified security components installed in the City's public buildings (e.g., a fire emergency plan or an intrusion detection system, guard services). After completing its work, the committee submitted a confidential report

² For example: a fire safety plan, guard services, alarm systems or high-security locksmithing.

³ *Building Act* [R.S.Q., chapter B-1.1], which replaces the *Public Buildings Safety Act* [R.S.Q., chapter S-3].

⁴ *Act respecting occupational health and safety* (R.S.Q., chapter S-2.1).

⁵ The *Criminal Code of Canada* (R.S.C., 1985, c. C-46).

⁶ *Act respecting occupational health and safety* (R.S.Q., chapter S-3.5).

⁷ Bureau de la sécurité privée: Organization that enforces the Private Security Act and oversees private security activities including: guard services, locksmithing, security consulting services, and electronic security systems.

⁸ The interdepartmental committee was made up of representatives from the Division de la sécurité, the Service de la sécurité incendie de Montréal, the Service de police de la Ville de Montréal, the Service du capital and the boroughs.

in August 2008⁹. This report included a review of various security components in City buildings, a summary threat and risk assessment (risk calculation grid) and an analysis of the priority level¹⁰ to be assigned to buildings.

According to the information we obtained, although the interdepartmental committee's findings highlighted significant deficiencies and provided recommendations to remedy them, there was no immediate follow-up on this report. Several years went by before the Direction générale developed and adopted a policy¹¹ entitled "Municipal building security" (the Policy), which was introduced in March 2014 and revised in March 2016. Minor amendments¹² were then made without any real changes to the contents.

The Policy statement clearly indicates that the City recognizes that it is important to ensure the security of employees, citizens and visitors to its facilities and to protect its critical infrastructure and considers these items "strategic issues"¹³. Under this policy, the City is committed to taking the steps needed to ensure the security and integrity of people and its infrastructure and therefore to:

- promoting proactive management of security in municipal buildings and in leased buildings or parts of buildings;
- supporting the development, implementation and maintenance of "Security programs" in municipal buildings, in accordance with applicable statutes, regulations and guidelines;
- encouraging the establishment of mechanisms that promote sharing and dissemination of information on Municipal building security.

The Security Policy therefore applies to all City business units, buildings, and all buildings or parts of buildings leased by the City. The Service de la gestion et de la planification immobilière (SGPI) is the business unit designated by the Direction générale, inter alia, to provide Municipal building security guidance and oversight and ensure the development and coordination of the City's global action plan for implementing this Policy. In particular, these responsibilities are incumbent on the Division de la sécurité of the SGPI, which is mandated to ensure the protection of the City's people, buildings and property.

⁹ Entitled: "Study on the status of Municipal building security – Report and recommendations," August 13, 2008.

¹⁰ Priority levels: Level 1 – Critical, Level 2 – Essential, Level 3 – Important, Level 4 – Not targeted.

¹¹ The Policy [C-OG-SCARM-PA-14-001] – "Municipal building security" dated March 11, 2014 was revised in March 2016 [Ref.: C-OG-SGPI-PA-16-001].

¹² The main amendment was to update the name of the business unit mandated by the Direction générale to coordinate the implementation of the Security Policy.

¹³ Pursuant to section 57.1 of the *Charter of Ville de Montréal*, the city manager's authority applies to all City business units when a strategic issue is involved.

It should be noted that a Policy guideline¹⁴ (the Guideline) defines the roles, responsibilities and reporting requirements for Municipal building security for the various stakeholders within the City's business units.

Moreover, it should be noted that in 2017, SGPI worked on implementing an extensive consolidation project aimed at repatriating all building activities for which it is responsible. In addition to building maintenance, various building security activities (e.g., guard services) were also transferred to SGPI, while some of these activities were previously managed individually by various central departments (e.g., the Service de l'Espace pour la vie, the Service de l'eau, the Service de police de la Ville de Montréal). This consolidation project within SGPI, as well as the review of the organizational structure involved, came into force on January 1, 2018. For example, with respect to Municipal building security, the new organizational structure of SGPI includes the following key changes:

- The Division de la sécurité, which existed long before¹⁵, is now part of the newly created Direction de l'optimisation, de la sécurité et de la propreté;
- The Centre opérationnel de sécurité¹⁶ (COS), which was previously part of the Division de la sécurité was repatriated with the Section centre d'appels, which reports to the Direction du bureau de projet et des services administratifs. It should be noted that the newly created Centre d'appels also receives requests for responses to address building equipment (including safety equipment) breakage, breakdowns or malfunctions¹⁷.

With regard to building security, SGPI's services are primarily provided to all of the City's central departments, as well as the nine¹⁸ former Ville de Montréal boroughs. At the time of our audit, SGPI was responsible for just over 750 of the 1,500 buildings in the City's building inventory.

For their part, boroughs from former suburban municipalities manage the security of buildings under their jurisdiction independently, according to their own mode of operation, and SGPI intervenes only on request. In this regard, a few exceptions remain for various building security issues in these boroughs, including the fact that some of them are connected to the City's monitoring station: the COS.

Given that thousands of people use municipal buildings on a daily basis, the City is required to exercise due diligence in order to ensure the protection of users and its property, but

¹⁴ Directive C-OG-GPI-D-16-001 – "Roles, responsibilities and reporting requirements for Municipal building security".

¹⁵ According to the information we obtained, the Division de la sécurité has been in operation since 1982.

¹⁶ Reference was made to the monitoring station (872-3017) which receives, inter alia, intrusion alarms, fire alarms, alarms in the event of emissions of harmful gases such as ammonia.

¹⁷ Reference was made to the client contact centre (872-1234).

¹⁸ These boroughs are: Ahuntsic–Cartierville, Côte-des-Neiges–Notre-Dame-de-Grâce, Le Plateau-Mont-Royal, Le Sud-Ouest, Mercier–Hochelaga-Maisonneuve, Rivière-des-Prairies–Pointe-aux-Trembles, Rosemont–La Petite-Patrie, Ville-Marie and Villeray–Saint-Michel–Parc-Extension.

also to develop an operations resumption plan to enable activities to quickly return to normal if an unexpected disruptive event occurs.

2. PURPOSE AND SCOPE OF THE AUDIT

Pursuant to the *Cities and Towns Act*, we completed a performance audit mission on Municipal building security management. We performed this mission in accordance with the Canadian Standard on Assurance Engagement (CSAE) 3001 described in the CPA Canada Handbook – Assurance, and other Canadian public sector certification standards issued by the Auditing and Assurance Standards Board, supported by CPA Canada.

The purpose of this audit was to ensure that security in the City's buildings, as well as leased buildings or parts of buildings, is managed in accordance with the statutes, regulations, policies and guidelines governing security management to ensure the security and integrity of facilities and users. However, it should be noted that our audit work excluded the following:

- Security in the design of new buildings or during major renovations;
- COS management, per se;
- Management of building access cards, because this security component was already audited by our office in 2011, 2012 and 2017.

The role of the Auditor General of the Ville de Montréal is to provide a conclusion regarding the objective of the audit. To do so, we collected a sufficient amount of relevant evidence on which to base our conclusion and to obtain a reasonable level of assurance. Our assessment is based on criteria we have deemed valid for the purposes of this audit. They are presented in Appendix 5.1.

The Auditor General of the Ville de Montréal applies the *Canadian Standard on Quality Control* (CSQC) 1 of the CPA Canada Handbook and, consequently, maintains a comprehensive quality control system that includes documented policies and procedures with respect to compliance with ethical guidelines, professional standards and applicable legal and regulatory requirements. She also complies with regulations on independence and other ethical guidelines of the *Code of Ethics of Chartered Professional Accountants*, which is governed by fundamental principles of integrity, professional competence, diligence, confidentiality and professional conduct.

Our audit work focused on the period extending from January 1 to October 31, 2018. However, for some aspects, data prior to these years were also considered. It was primarily completed between November and December 2018. We also considered information sent to us until March 2019.

This work primarily involved the following business units:

- SGPI:
 - Direction de l’Optimisation, de la sécurité et de la propreté, Division de la sécurité;
 - Direction du bureau de projet et des services administratifs, Division des services administratifs;
 - Direction des transactions immobilières, Division des locations;
- Anjou borough;
- Lachine borough;
- Côte-des-Neiges–Notre-Dame-de-Grâce (CDN-NDG) borough.

Upon completing our audit work, we presented a draft audit report to the managers of each audited business unit for discussion purposes. The final report was then forwarded to the managers of each business unit involved to obtain an action plan and a schedule for the implementation of recommendations concerning them, and to the Direction générale, the deputy director-general of the Services institutionnels, the deputy director-general of the Service aux citoyens and the Service de la concertation des arrondissements. A copy of the final report was also sent, for information purposes, to the borough directors not within the direct scope of our audit work, to enable them to implement the recommendations where warranted.

3. AUDIT RESULTS

3.1. GOVERNANCE FOR MUNICIPAL BUILDING SECURITY

As mentioned, SGPI is the business unit designated by the Direction générale to coordinate the City’s global action plan for implementing the Security Policy. It is also responsible for disseminating and assessing its implementation by the City’s business units. The Policy and the Policy Guideline stipulate that every year, each borough director and each department head must submit a report to SGPI on his action plan for the previous year and an action plan for the current year aimed at developing, implementing and updating security programs. In this regard, SGPI is responsible for reviewing the business units’ reports and action plans and filing an overall annual assessment with the city manager regarding Municipal building security management.

Management of Municipal building security is based primarily on communicating clear guidelines from senior management on the level of security that the City intends to achieve in accordance with legislative requirements governing this area of activity, building characteristics and budget availability. Implementing the Security Policy adopted by the City therefore involves first:

- clarifying the division of roles and responsibilities of all municipal stakeholders to effectively coordinate the security measures to be implemented;
- developing “Owner security standards” to standardize its vision for managing the security of its facilities, based on type of occupancy;
- conducting safety studies (e.g., a risk, threat and vulnerability analysis) specific to each building, to identify the emergency measures to be implemented;
- defining the nature and expected content of the security programs to be implemented taking into account legal requirements and the level of security that the City wants to achieve in its buildings.

In this context, our audit work involved confirming whether the Security Policy adopted by the Direction générale of the City had been implemented, and determining the extent to which all the prerequisites to its implementation (as stated above) had been taken into account and implemented by SGPI.

3.1.1. IMPLEMENTATION OF THE SECURITY POLICY

3.1.1.A. BACKGROUND AND FINDINGS

According to the information obtained from the people we interviewed, after the Security Policy was adopted in 2014, a work team entitled “Unité de l’analyse et du soutien des programmes de sécurité” [Security program analysis and support unit] (an analysis unit)¹⁹ reporting to the Division de la sécurité of the SGPI was created to implement the Policy. Therefore, it appears that the analysis unit had initiated various key activities to implement the Security Policy, including:

- an inventory of existing security measures within City buildings;
- defining and documenting security concepts;
- defining the concept of “Security Program”, its content and expected standards by type of building;
- planning computer system changes in partnership with the Service des technologies de l’information.

¹⁹ The Unité de l’analyse et du soutien des programmes de sécurité consisted of three security officers, an electrical foreman, an architectural technician and a technical officer.

The unit has been in operation for two and a half years, with its resources working full-time on the project. The team members were gradually assigned to fulfill responsibilities deemed more urgent by SGPI managers, and finally the team established in 2014 was dismantled in 2016. Although the Policy is still relevant and deals with a strategic issue, it is clear that to date, the Policy adopted in 2014 has essentially not been implemented and that SGPI has not specifically assigned any other resources to implement it. In addition, we note that an internal memo²⁰ on the Policy and the Policy Guideline, as originally drafted, was released in 2014. Although they were revised in 2016, no other steps were taken to provide information on them in order to promote their implementation. Our audit work highlights the fact that most of the stakeholders interviewed know little or nothing about them.

According to the information obtained from the SGPI managers and staff we interviewed, the absence of clear guidelines from the municipal administration on the level of security expected for municipal buildings, the history of the multiple reorganizations undergone by the Division de la sécurité in recent years, the retirement of key experienced resources together with the fact that the number of security expert advisers is currently quite small²¹ are some of the key factors raised that have hindered implementation of the Security Policy and prevented SGPI from fully assuming its responsibilities in this regard.

We read the budget presentation documents produced by SGPI for 2019 and noted that one of the objectives is to “...review the *Municipal building security management policy, as well as the related guidelines and tools*”. Under the circumstances, we are of the view that, as the mandatory, SGPI will have to take steps to gather information from all of the City’s business units in order to develop a profile of the current status of security in municipal buildings. It goes without saying that the involvement of all stakeholders in the City’s business units will need to be coordinated. Subsequently, it will have to take steps to find out the orientations advocated by the Direction générale as to the level of security for municipal buildings and subsequently to present an action plan, with a view to:

- propose, if applicable, changes deemed appropriate to adopt a new Security Policy in the short term;
- identify the mechanisms to be implemented to communicate and explain the content of the Policy, guidelines and related tools, so that all stakeholders are informed of the guidelines and steps to be taken to ensure security in the buildings for which they are responsible;
- implement and monitor the Security Policy.

²⁰ Internal memo No. 592, March 12, 2014.

²¹ At the time of our audit in 2018, the consulting team consisted of three security specialists, a security officer and a consultant.

RECOMMENDATIONS

- 3.1.1.B.** We recommend that the **Service de la gestion et de la planification immobilière** take the necessary steps to develop a profile of the current status of Municipal building security and to find out what policies the **Direction générale** advocates with respect to the expected level of security for municipal buildings, in order to lay the groundwork for sound management of this strategic issue.
- 3.1.1.C.** We recommend that, taking into account the policies that have been adopted, the **Service de la gestion et de la planification immobilière** submit an action plan to the **Direction générale** with regard to the **Policy on Municipal building security** so as to facilitate, in the short term, the filing of changes deemed appropriate, and communication and monitoring mechanisms for implementing the plan in order to ensure that necessary security measures are in place in municipal buildings.

BUSINESS UNITS' RESPONSES

- 3.1.1.B.** **Service de la gestion et de la planification immobilière**
[TRANSLATION] After known security data have been compiled and analyzed, the Division de la sécurité will develop a profile of existing security measures, including services, physical security measures, and emergency procedures. Subsequently, a presentation of the current situation and security issues will be delivered to the Direction générale for the purpose of strategic orientations. (Planned completion: June 2019)
- 3.1.1.C.** **Service de la gestion et de la planification immobilière**
[TRANSLATION] Review and approval of the current policy (2016) with regard to the policy directions provided by the Direction générale. Subsequently, a policy implementation plan will be developed for consultations and communications with the boroughs and departments. (Planned completion: December 2019)

3.1.2. DIVISION OF ROLES AND RESPONSIBILITIES

3.1.2.A. BACKGROUND AND FINDINGS

The Security Policy Guideline defines the roles and responsibilities in this area for all City business units (see Appendix 5.2.). In particular, the Guideline states that each official responsible for managing a real estate asset must, among other things, ensure that the buildings for which he is responsible comply with legal and regulatory security standards, update related security programs and have them validated by SGPI. As mentioned earlier, although the division of roles and responsibilities has been defined, it is clear that the various stakeholders are not familiar with the Security Policy and that, to date, it has either not been implemented or only very partially implemented.

In addition, it should be noted that, following the start of the real estate consolidation project, effective January 1, 2018, SGPI has made efforts to align the integration of security operations repatriated from various central departments and to adjust its service offering to meet organizational needs. It has therefore undertaken to clarify roles and responsibilities by writing and sending service agreements to all central departments (in late 2017 and early 2018) tailored to each department. They are entitled "*Chantier de regroupement du SGPI – Rôles et responsabilité du SGPI pour la fonction immobilière.*" [SGPI consolidation project – SGPI's roles and responsibility in real estate matters.] In particular, SGPI's role in building security is addressed.

In October 2018, SGPI prepared an internal document stating that the Division de la sécurité is responsible for providing its clients with the following building security services:

- Security expertise;
- Guard and patrol services;
- Security system maintenance (e.g., fire, intrusion);
- Owner requirements (or standards) by building type;
- Migration of security systems to new technologies;
- Secure key management;
- Providing occupants with support on building security analysis;
- Access control management.

Our audit work revealed some distortions, in particular between the content of SGPI's service offering, the service agreements sent to the various central departments and actual operations in the field. Inter alia, we note the following:

- Many of the responsibilities identified in the Division de la sécurité's service offering have not yet been completely fulfilled (e.g., providing property requirements by building type, providing occupants with support on building security analysis);

- Service agreements sent to the City's central departments stipulate that SGPI "*...produce evacuation plans, emergency measures plans, fire safety plans and specific emergency plans.*" However, representatives of this division maintain that these responsibilities actually fall within the purview of business units that operate the buildings and that the Division de la sécurité itself provides its support (expertise) for the development and approval of these plans. In this respect, we find that this assertion is more in line with the content of the Security Policy and Guideline in which business units are responsible for implementing building security.

Moreover, it is apparent from the comments gathered during our audit that several stakeholders (e.g., the Direction de la gestion de projets immobiliers, the Direction des transactions immobilières, the CDN-NDG borough) do not have a clear understanding of the roles and responsibilities of the Division de la sécurité of the SGPI or do not know that representatives of this division may provide expertise and become involved.

With respect to the three boroughs included in our audit, the information obtained reveals the following:

- Regarding the two boroughs that were created from former suburban municipalities (Anjou and Lachine), which independently manage security within buildings under their jurisdiction, we note that no stakeholders or administrative units have specifically been designated to assume responsibility for coordinating the implementation of all required security measures and monitoring them within the buildings. Building security management is actually left in the hands of the various administrative units of the borough, although consistency, standards or processes may not necessarily have been established;
- With regard to the CDN-NDG borough, as with the two boroughs from former suburban municipalities, there is also no case manager to coordinate the implementation of security measures within their buildings. It should be noted that this borough from the former Ville de Montréal is entitled to receive SGPI services. However, based on the information from the managers we interviewed, it appears that SGPI does not always provide the services required (e.g., guard services, support for the preparation of evacuation plans, obtaining controlled keys). As a result, operational management of various aspects of security is left to front-line borough employees, who do not necessarily have the required expertise and who are sometimes compelled to use private firms.

In short, although the Policy covers all City business units, we find that the division of roles and responsibilities in the operationalization of security is distorted. There is a lack of knowledge of the steps to be taken under the Security Policy, and the City's various stakeholders (e.g., employees, managers) do not appear to be fully assuming their responsibilities. All the stakeholders we interviewed agree that a lot of time is wasted trying to figure out who does what in terms of security within City buildings.

In this regard, although the SGPI service offering covers the nine boroughs from the former Ville de Montréal, we have not identified evidence of any service agreements with them.

In our view, in order to clarify roles and responsibilities and to avoid any ambiguity regarding management of security in buildings under the jurisdiction of these boroughs, it would be appropriate for SGPI to enter into such agreements as it has with central departments.

In short, the current situation may, at least in part, be helping to perpetuate the inertia in implementing the Security Policy and, consequently, putting the security of municipal building users at risk, in addition to threatening the City's business continuity. In this sense, we believe that additional efforts will be required to further clarify the roles and responsibilities of the City's various business units and stakeholders in the area of Municipal building security.

RECOMMENDATIONS

- | | |
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| 3.1.2.B. | We recommend that the Service de la gestion et de la planification immobilière take steps to clarify and communicate the roles and responsibilities of the City's various business units, so that stakeholders fully assume their responsibilities in the area of Municipal building security. |
| 3.1.2.C. | We recommend that the Service de la gestion et de la planification immobilière take steps to develop and enter into an agreement with the boroughs covered by its service offering, in order to avoid any ambiguity as to the division of roles and responsibilities in terms of security within buildings under their jurisdiction. |
| 3.1.2.D. | We recommend that the boroughs of Anjou, Lachine and Côte-des-Neiges–Notre-Dame-de-Grâce take steps to appoint a person responsible for coordinating and monitoring the implementation of all necessary security measures within buildings under their jurisdiction, in order to protect users and property, and ensure continuity of operations. |

BUSINESS UNITS' RESPONSES

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| 3.1.2.B. | <p><i>Service de la gestion et de la planification immobilière</i>
 <i>[TRANSLATION] Revision of the guideline on the business units' roles and responsibilities with regard to the policy directions provided by the Direction générale.</i></p> <p><i>A plan will be developed to communicate this guideline to all departments and boroughs (see 3.1.2.C.). (Planned completion: December 2019)</i></p> |
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3.1.2.C. Service de la gestion et de la planification immobilière
 [TRANSLATION] A communication will be sent to each borough and central department requesting that they appoint a security coordinator to represent them.

This working group will communicate service offerings, and roles and responsibilities and help develop and validate various tools. (Planned completion: June 2019)

3.1.2.D. Anjou borough
 [TRANSLATION] The borough director will formally appoint the persons responsible based on the buildings and type of response. (Planned completion: June 2019)

Lachine borough
 [TRANSLATION] This recommendation will be addressed at the next steering committee meeting, and the borough representative will be appointed. (Planned completion: June 2019)

Côte-des-Neiges—Notre-Dame-de-Grâce borough
 [TRANSLATION] The borough’s director of Services administratifs et du greffe is the person appointed to ensure the implementation of a set of required security measures. (Planned completion: April 2019)

3.1.3. DEVELOPMENT OF SECURITY STANDARDS

3.1.3.A. BACKGROUND AND FINDINGS

The Security Policy states that SGPI is the business unit responsible for developing policies and guidelines on Municipal building security. In this regard, it provides oversight and exercises an advisory role with the City’s business units. More specifically, and as mentioned above, the Division de la sécurité’s service offering includes providing its clients with property requirements, i.e., security standards by building type.

In the opinion of security stakeholders and managers interviewed at SGPI, sound building security management must first and foremost be based on implementing these security standards that guide the various municipal stakeholders responsible for managing a real estate asset. The owner of a major building inventory such as the City must follow this principle in order to standardize its vision of security in managing its facilities, based on type of occupancy. Security management procedures for each type of building in the building stock must be reviewed in order to implement such security standards. Factors such as the size of the building, types of activities allowed in the building, or high traffic volumes, as well as higher specific risks inherent in some facilities (e.g., drinking water production plants) will influence the choice of security measures to be implemented.

Major guidelines emerge from these discussions, and the owner establishes minimum security standards, develops guidelines, procedures and tools in order to frame and standardize security measures to be introduced in accordance with the type and characteristics of the buildings in its building inventory. For example, these security standards could involve:

- the procedure for performing a building security study (audit);
- developing and implementing building security programs;
- regulations on access control and locksmithing;
- establishing emergency plans;
- guidelines for guard services and remote monitoring of facilities.

In order to identify security measures required under established security standards, it goes without saying that the City must have a complete and up-to-date inventory of existing security measures within its buildings.

We made the following findings based on the information obtained from the various stakeholders we interviewed within SGPI:

- Safety standards by building type have not yet been defined and no guidelines have been established for managing Municipal building security;
- There is no guide for conducting studies on City building security;
- Although the Policy and Guideline adopted by the Direction générale refers to the obligation for each official responsible for a real estate asset to develop, implement and update a Municipal building security program, the definition of the concept of “Security program”, its content and expected standards by type of building have not yet been established and communicated to the various stakeholders;
- The inventory of existing security measures in municipal buildings has not been completed since the 2008 study. As a result, SGPI does not have a clear picture of the situation, and it may therefore be more difficult to identify problematic cases, identify response priorities and provide necessary oversight.

We note that because the analysis unit created to implement the Security Policy was abolished before the Policy was implemented, several aspects essential to effective Municipal building security management are still pending. In this regard, during the meetings conducted as part of audit work, we noted widespread dissatisfaction among Division de la sécurité stakeholders with the lack of guidance on Municipal building security and the lack of progress since the 2008 study.

In sum, although the City declared Municipal building security a “strategic issue” in 2014 and that it has a policy and a guideline on Municipal building security, it is clear that efforts must be made to establish the basis for effective building security management and to implement measures to promote user security and protection of facilities.

In our opinion, it would be critical in the near future for SGPI, as the City's mandatary, to provide the basis for the level of security (standards) that municipal buildings are to be given in accordance with applicable laws and regulations and the risks characterizing them. In this respect, SGPI should take into account the guidelines adopted by the Direction générale, prepare the frameworks that provide the various stakeholders with the necessary guidelines for implementing appropriate security measures within the buildings for which they are responsible. This would promote the exercise of prudent management in this area.

In addition, in order for SGPI to ensure the completeness and compliance of security measures required in a building given its characteristics, we believe that it should be a priority for SGPI to complete, in conjunction with all City business units, an inventory of existing security measures in municipal buildings.

RECOMMENDATIONS

3.1.3.B. We recommend that the Service de la gestion et de la planification immobilière complete the inventory of existing security measures in all municipal buildings, so that it can ensure that these measures are complete and in compliance, taking building characteristics into account.

3.1.3.C. We recommend that the Service de la gestion et de la planification immobilière establish standards defining the expected level of security in buildings, taking into account statutes, regulations and related risks. SGPI should then develop and disseminate these guidelines, the necessary frameworks and guides, which will provide a baseline for the various stakeholders involved in implementing appropriate security measures in municipal buildings.

BUSINESS UNITS' RESPONSES

3.1.3.B. *Service de la gestion et de la planification immobilière*
[TRANSLATION] A tool used to inventory security measures, including guard services, physical security measures and emergency measures will be developed and provided to borough and central department security coordinators to complete the overview of security measures. The Direction de l'optimisation de la sécurité et de la propreté will maintain his tool to provide oversight over time and according to circumstances. In connection with 3.1.1.B. (Planned completion: September 2019)

3.1.3.C. *Service de la gestion et de la planification immobilière*
[TRANSLATION] Standard specifications are being updated to establish general concepts for each physical security component by major building category. These concepts will be incorporated into the Service de la gestion et de la planification immobilière's owner standards guide. The Service de la gestion et de la planification immobilière will forward the guide to the various stakeholders. (Planned completion: September 2019)

3.1.4. IMPLEMENTATION OF SECURITY STUDIES AND SECURITY PROGRAMS

3.1.4.A. BACKGROUND AND FINDINGS

As we have just mentioned, SGPI obviously had to establish expected standards for Municipal building security management. In particular, two key components of effective building security management involve conducting security studies for each building and creating an appropriate security program. Security measures specific to a building are based on the threats and risks to which it is exposed due to its characteristics and typology. These factors are identified through a security study, i.e., an evaluation process that includes the following steps:

- Preparation: Define what needs to be protected (e.g., users, assets, information, operations);
- Threat assessment: Identify the threats against which they are to be protected;
- Risk assessment: Determine whether existing measures are satisfactory;
- Recommendations: Specify risk mitigation measures to be implemented;
- Reassessment: Perform periodic updates at a frequency to be determined (e.g., every five years).

This building security study is a prerequisite for implementing an appropriate security program. It is well established that such a program is only effective if it is developed based on a sound understanding of the risks and threats that must be addressed. This security program provides a detailed description of the measures (e.g., prevention, protection, response, and emergency measures) designed to protect life, property and the resumption of the organization's normal activities and operations following an event. A building security program could involve creating an action plan for each of the following items:

- Risk assessment;
- Physical security (e.g., guard services, patrols, remote monitoring);
- Access control and locksmithing;
- Emergency response (a response plan);
- Crisis communications;
- Business continuity plan.

We have previously noted that no security standards have been established for City buildings. Nevertheless, we tried to determine whether the audited business units had conducted independent security studies, and if they had, whether they were used to support the development of a security program or to support the identification of security measures to be implemented.

Based on the information identified in our audit work, we note that with the exception of a building for which SGPI is responsible, a building in the Lachine borough and another building managed by the CDN-NDG borough, the audited business units did not conduct any known security studies for any of the City's 1,500 buildings.

Only recently, in March 2018, a new²² security study of a critical building was conducted by the Division de la sécurité concerning the physical security issues of the facility. The report describes the security gaps that were identified and suggests that a series of recommendations be implemented to improve building security in the short, medium and long terms. An implementation plan for short-term measures was prepared in July 2018 and was about to be completed in January 2019. With respect to other more extensive security measures, the report states that the Direction de la gestion de projets immobiliers of the SGPI will have to be involved. In this sense, planning was initiated by developing a project opportunity sheet.

For the second security study conducted by the Lachine borough, only one building was analyzed by an outside firm. According to the information we obtained, this firm was awarded a contract in 2016 for occupational health and safety consulting services concerning Lachine's Direction des travaux publics facilities. Initially, high-risk activities and areas were identified to implement a Fire Safety Plan (FSP), but a comprehensive Emergency Measures Plan (EMP) was developed instead, in 2018.

Considering the countless security risks faced by City facilities (e.g., fire, theft and vandalism, dangerous gas leaks, terrorist acts), we believe that a security study must be conducted for each building in order to implement a specific security program for each facility. This means that the Division de la sécurité, which has the security expertise, will have to work closely with each City business unit that operates the buildings, because they are familiar with the buildings and how they work. Considering the size of the City's building inventory, these measures must first be implemented in critical buildings.

²² SGPI had already conducted a security study of this building in 2011.

RECOMMENDATIONS

- 3.1.4.B.** We recommend that the Service de la gestion et de la planification immobilière work with all City business units to establish the priority level of municipal buildings and plan security studies that will be used to support the identification of appropriate security measures to be implemented in each building.
- 3.1.4.C.** We recommend that the Service de la gestion et de la planification immobilière create, implement and maintain a security program based on a security study for each City building to ensure the security of users and assets, as well as the continuity of City operations.

BUSINESS UNITS' RESPONSES

- 3.1.4.B.** *Service de la gestion et de la planification immobilière*
 [TRANSLATION] Building prioritization criteria will be updated to provide an up-to-date overview of municipal building security.
 (Planned completion: September 2019)
- A study methodology will be created in conjunction with an external resource to develop criteria and checklists. The studies will be conducted in conjunction with the various business units and the Service de la gestion et de la planification immobilière. (Planned completion: March 2020)*
- Development and implementation of studies. (Planned completion: in 2022)*
- 3.1.4.C.** *Service de la gestion et de la planification immobilière*
 [TRANSLATION] Building prioritization criteria will be updated to provide an up-to-date overview of municipal building security.
 (Planned completion: September 2019)
- A study methodology will be created in conjunction with an external resource to develop criteria and checklists. The studies will be conducted in conjunction with the various business units and the Service de la gestion et de la planification immobilière. (Planned completion: March 2020)*
- Development and implementation of studies. (Planned completion: in 2022)*

3.2. EXISTING SECURITY MEASURES

At this stage, we identified major flaws in the governance of Municipal building security, with respect to the lack of progress in implementing the Policy and the Guideline, the division of roles and responsibilities and the lack of security standards. Not to mention the fact that security studies or appropriate security programs have not been implemented for most municipal buildings. Under the circumstances, it is fair to doubt whether all necessary security measures have been implemented in municipal buildings and whether they are effective.

This is why, without conducting a comprehensive audit, we looked into existing measures regarding the following security activities:

- Emergency measures plans;
- Remote monitoring;
- Controlled locksmithing;
- Guard services.

It should be noted that for some of these security activities, our audit considered a sample of 26 buildings occupied by the audited business units. We selected five buildings under a lease agreement in this sample, because, like buildings owned by the City, leased buildings or parts of leased buildings are covered by the Security Policy. In this regard, the Division des locations operated by the Direction des transactions immobilières of the SGPI, was also consulted. The details of our sample are presented in Table 1. It should be noted that buildings in the sample were selected because of their purpose (e.g., administrative, sports and recreation, industrial) and because they were critical buildings.

TABLE 1 – SAMPLE OF BUILDINGS BY AUDITED BUSINESS UNITS

	SERVICE DE LA GESTION ET DE LA PLANIFICATION IMMOBILIÈRE ^[A]	ANJOU BOROUGH	LACHINE BOROUGH	CÔTE-DES-NEIGES-NOTRE-DAME-DE-GRÂCE BOROUGH	TOTAL
City-owned buildings	9	4	4	4	21
Leased buildings	2	1	1	1	5
TOTAL	11	5	5	5	26

^[A] Buildings occupied by various business units entitled to receive services from the Service de la gestion et de la planification immobilière.

3.2.1. EMERGENCY MEASURES PLANS

3.2.1.A. BACKGROUND AND FINDINGS

Experience shows that various events can affect the security of users and an organization's operations. Incidents involving hazardous materials, electrical outages, fires, bomb threats, active shooters and floods come to mind, just to name a few. Under these circumstances, an ERP is a necessary management tool. It is a document that dictates the procedures to be followed by a rescue organization in the event of an emergency or disaster posing a threat to personal health and safety and asset integrity. It is designed to ensure a rapid and controlled response.

Note that an ERP involves the concept of a building "*risk assessment*". It includes a Fire Safety Plan (FSP). The City's fire safety bylaws²³ follow the National Fire Code of Canada (NFCC), which requires that a fire safety plan (FSP) be implemented for each building, that it be kept up to date and that fire drills be performed at least once a year. The ERP may also incorporate a variety of specific emergency plans (SEPs) for a variety of situations that may occur (e.g., hazardous material leaks, a bomb threat, an active shooter). The purpose of these SEP is to:

- mobilize the identified responders in order to mount a consistent and effective incident response that minimizes damage;
- protect staff and users in an emergency, as well as the environment, where appropriate.

Also, in accordance with best management practices, the ERP must also include a disaster recovery plan, which is all the more crucial for critical infrastructure that provides essential public services.

Although the main legal obligation to be met by an ERP is the FSP, establishing a SEP that addresses the risks to which City buildings exposed is highly recommended. In this regard, it should be noted that the City's Policy Guideline stipulates that the person responsible for a real estate asset must take steps to ensure the security of employees, citizens and visitors who use buildings for which he is responsible. In particular, he must be involved in identifying, assessing and controlling risks and looking for solutions.

It should be noted that the people we interviewed at SGPI told us from the outset that there was a computerized application called the Programme de gestion des mesures d'urgence dans les édifices municipaux (PGMUEM), which SGPI introduced (around 2006) to manage and update City building ERPs. The PGMUEM stipulates that a building emergency coordinator must be appointed. It includes an FSP template to be completed as well as a bomb alert SEP template. It does not include any other SEP templates. Each appointed coordinator is therefore responsible for recording in the PGMUEM the completed and updated

²³ RCG 12-003 – *By-law concerning the Service de sécurité incendie de Montréal* and RCG 12-005 – *By-law concerning fire safety*.

plans for buildings for which they are responsible. It should be noted that the Division de la sécurité is not responsible for ERPs. It ensures that ERPs are actually implemented by business units in accordance with the regulations, and it provides the necessary support, if applicable.

We examined the information entered in the PGMUEM and found that only 259 of the 1,500 City buildings were registered as having an FSP or SEP in the event of a bomb threat. Moreover, we reviewed the inventory of FSPs registered in the PGMUEM and found that many of these had not been updated for several years (e.g., the last updates were in 2004, 2007 and 2011). It appears that the information in the PGMUEM is not updated on a regular basis. This includes the identification of the designated emergency coordinators and the FSPs themselves, their approval and fire drill logs.

These findings point to the possibility that some City buildings do not have compliant FSPs, despite the fact that this is a legal requirement. Under the circumstances, because the information entered in the PGMUEM is incomplete and not up-to-date, the Division de la sécurité cannot currently rely on this tool to confirm, as required, whether there is one FSP per building or an SEP. We are of the view that corrective action will need to be taken promptly to provide the Division de la sécurité with an effective monitoring tool to respond in a timely manner in order to ensure that required adjustments are made expeditiously.

RECOMMENDATION

3.2.1.B. We recommend that the Service de la gestion et de la planification immobilière take the steps needed to acquire an effective monitoring tool. It will be used to perform required monitoring and quickly identify and respond to situations involving emergency measures plans required within municipal buildings and to ensure they are kept up to date.

RÉPONSE DE L'UNITÉ D'AFFAIRES

3.2.1.B. *Service de la gestion et de la planification immobilière*
[TRANSLATION] The potential for optimizing the implementation of the Programme de mesures d'urgence dans les édifices municipaux will be assessed in conjunction with the Division du bureau de projet et de la gestion de l'information of the Service de la gestion et de la planification immobilière. At the same time, a typical emergency management program will be developed. This program will then be distributed to users. The Direction de l'optimisation, de la sécurité et de la propreté will provide coaching and support to the units in revising and implementing their plans. (Planned completion: September 2019)

For buildings in our sample within each audited business unit, we tried to determine whether there was a more comprehensive ERP incorporating either an FSP or any other SEPs (i.e., regardless of whether they are listed in the PGMUEM) and examined it. If there was no ERP, we looked for an FSP and/or an SEP and reviewed them, if applicable. Generally, our examination reveals that only the boroughs of Lachine and CDN-NDG have developed an ERP for specific facilities. Otherwise, the only plans implemented by audited business units involved FSPs or SEPs in the event of ammonia leaks. The detailed results of our review are presented below.

EMERGENCY MEASURES PLAN

We obtained from the Lachine borough the ERP implemented in June 2002 for the two Lachine arenas, which was produced by an outside security firm. This ERP includes an inventory of building characteristics, risks and specific instructions for responding to various events (e.g., fire, malicious acts, hazardous material leaks, electrical outages, floods, earthquakes). However, we note that the ERP was last revised in February 2005.

With respect to the CDN-NDG borough, we note that an ERP was implemented for a sports facility in October 2011. This ERP provides response plans (e.g., emergency procedures, responders' roles, and evacuation plans) for various events (e.g., fire, hazardous material leaks, report of a suspicious package, bomb threats, physical threats, electrical outages, earthquakes). However, according to the information we obtained, this ERP has not been updated since then.

We also note that the implementation of measures to ensure that City activities and operations return to normal following an event is not a widespread practice²⁴. We believe that when business units operating these buildings are implementing an ERP, they should include the steps to be taken to ensure quick resumption of operations, particularly when they are critical.

In sum, developing such ERPs is a responsible and prudent management practice which, in our opinion, should be extended to all buildings requiring the implementation of such measures. As already mentioned above, it will be appropriate for these ERPs to be developed based on a risk assessment, as well as any standards that SGPI may have established. Also, because these ERPs are living documents that need to be continuously updated, procedures should also be established to ensure that they are sustainable.

FIRE SAFETY PLAN

With respect to FSPs, for each City-owned building in our sample, we tried to confirm that they had been implemented and updated, and that a fire drill had been conducted at

²⁴ According to the information we obtained, some business units are developing a business continuity plan in conjunction with the Direction de la sécurité civile et de la résilience.

the site last year. It should be noted that fire drills are designed to ensure that custodial staff and occupants use available evacuation routes effectively and safely. However, they also provide an opportunity to identify barriers to effective evacuation and then take appropriate corrective action. The results of the examination are presented in Table 2

TABLE 2 – FIRE SAFETY PLAN AND ANNUAL FIRE DRILL

AUDITED BUSINESS UNITS	SERVICE DE LA GESTION ET DE LA PLANIFICATION IMMOBILIÈRE ^[A]	ANJOU BOROUGH	LACHINE BOROUGH	CÔTE-DES-NEIGES-NOTRE-DAME-DE-GRÂCE BOROUGH	TOTAL
SAMPLE – 21 CITY-OWNED BUILDINGS ITEMS ASSESSED	9 BUILDINGS	4 BUILDINGS	4 BUILDINGS	4 BUILDINGS	
Existing Fire Safety Plans	7	4	2	2	15
Security plans registered in the Programme de gestion des mesures d'urgence dans les édifices municipaux (PGMUEM)^[B]	7	4	2	2	15
Up-to-date security plans	2	4	0	1	7
Security plans approved by the Service de la gestion et de la planification immobilière (SGPI)	2	4	0	1	7
Annual fire drill	3	3	0	1	7

^[A] Buildings occupied by various business units entitled to receive services from the Service de la gestion et de la planification immobilière.

^[B] Source: Implementation of the Programme de gestion des mesures d'urgence in municipal buildings as at January 9, 2019.

The review found that 15 of the 21 buildings in our sample had an FSP, which was registered in the PGMUEM. Of the 15 existing FSPs, only 7 were current, approved, and included a fire drill within the last 12 months. Our review confirms that there is a significant risk that could compromise the security of users and City assets, as well as the continuity of operations in the event of a fire in buildings that do not have an FSP or an up-to-date FSP.

This situation is all the more troubling, the by-law stipulates that the City must have an updated FSP for each of its buildings.

As part of our audit work, we also reviewed a service agreement signed in January 2006 between the Service de sécurité incendie de Montréal (SIM) and SGPI²⁵. Under this agreement, SIM delegates responsibility to SGPI for producing an appropriate FSP for each City building. According to the procedure described in the agreement, FSPs are produced by property managers responsible for the buildings. They must then be validated annually by SGPI if the building is equipped with a single-stage fire alarm system. Only FSPs in buildings with a two-stage fire alarm system or buildings with hazardous materials procedures or storage must be approved by SIM. In fact, while this agreement is clear in terms of shared responsibility, we note that the process described in the agreement has not been implemented. As a result, we believe that SGPI will have to take steps to identify buildings for which FSP needs to be approved by SIM and make the necessary arrangements to comply with the agreement.

LEASED BUILDINGS

Moreover, it should be noted that the City's Security Policy also applies to all buildings or parts of buildings leased by the City. Specifically, in this situation, the Policy Guideline states that a City official must ensure that "*...the building owner meets the legal and regulatory personal safety requirements incumbent upon him, within the limits of the contractual relationship that binds him to the tenant*". We therefore tried to identify the personal safety measures implemented for the five leased buildings included in our sample.

According to the information we obtained, for buildings or parts of buildings leased by the City for central departments and boroughs from the former Ville de Montréal (including the CDN-NDG borough), the Division des locations du SGPI is responsible for financial monitoring, lease negotiations and compliance with clauses set out in the leases. For their part, boroughs from former suburban municipalities are responsible for their own leases and must, like SGPI, include fire safety clauses and ensure that building owners comply with them.

We examined the leases obtained from the audited business units and noted that all of them include a fire safety clause. However, we noted disparities in the way in which these clauses are written. While some leases have specific clauses outlining the requirements that the owner is expected to meet (e.g., evacuation plans and procedures, fire drills), others refer to clauses stipulating that owners must comply with all applicable building security laws and regulations. In our opinion, it is difficult to monitor security expectations and obligations because they are not always clear. We also noted that none of the audited business units had mechanisms in place to ensure that the owner complied with these fire safety clauses (see Table 3).

²⁵ At that time, the Division de la sécurité reported to the Direction des immeubles du Service de la mise en valeur du territoire et du patrimoine.

TABLE 3 – MONITORING FIRE SAFETY CLAUSES FOR LEASED BUILDINGS

ITEM ASSESSED	SERVICE DE LA GESTION ET DE LA PLANIFICATION IMMOBILIÈRE ^[A] (2 BUILDINGS)	ANJOU BOROUGH (1 BUILDING)	LACHINE BOROUGH (1 BUILDING)	CÔTE-DES-NEIGES–NOTRE-DAME-DE-GRÂCE BOROUGH (1 BUILDING)
Fire safety clauses monitored	0	0	0	0

^[A] Buildings occupied by various business units entitled to receive services from the Service de la gestion et de la planification immobilière.

Under the circumstances, we believe that steps will have to be taken to align practices regarding fire safety clauses to be included in lease agreements. In addition, mechanisms to monitor compliance with these clauses will have to be implemented so that the City can confirm that appropriate emergency measures are in place for all employees and users who enter these leased buildings benefit.

SPECIFIC EMERGENCY PLAN – AMMONIA LEAKS

In July 2010, the City adopted a 10-year Programme de soutien à la mise aux normes des arénas municipaux [Municipal arena upgrade support program] aimed at converting the refrigeration systems of 40 indoor rinks in 34 arenas across the 19 City boroughs to a greener technology. The City chose a natural refrigerant gas, ammonia²⁶, which poses a public health risk in the event of a leak. Given the highly dangerous impact of an ammonia leak on arena users and local residents, the boroughs, with the assistance of the Division de la sécurité, have developed and implemented SEPs in the event of an ammonia leak. In order to mount a quick and safe incident response, the SEP:

- defines responders' responsibilities according to the gravity of the situation;
- describes the emergency response measures for major ammonia leaks.

For the three arenas in our sample, we obtained a copy of these SEPs showing that they had actually been implemented (see Table 4).

²⁶ Ammonia is used as a refrigerant especially to replace halocarbon refrigerants (freons), whose emissions deplete the ozone layer.

TABLE 4 – SPECIFIC EMERGENCY PLAN IN THE EVENT OF AN AMMONIA LEAK IN THE THREE ARENAS

ITEMS ASSESSED	ANJOU BOROUGH (1 BUILDING)	LACHINE BOROUGH (1 BUILDING)	CÔTE-DES-NEIGES- NOTRE-DAME-DE-GRÂCE BOROUGH (1 BUILDING)
There is a Specific Emergency Plan	YES	YES	YES
Registered in the Programme de gestion des mesures d'urgence dans les édifices municipaux (PGMUEM)	NO	NO	NO
Up-to-date Specific Emergency Plan	YES	NO	NO
Last updated in	November 2018	April 2015	November 2017

First, we found that none of these SEPs were registered in the PGMUEM application. Second, we reviewed these three SEPs and found that considerable work had been done to develop and implement them. It appears that Anjou borough updated them annually, however, the boroughs of Lachine and CDN-NDG did not.

Based on all the findings on emergency measures plans in municipal buildings, it is clear that a significant turnaround is required. We are therefore of the view that, based on a specific security study for each building, business units must implement SEPs deemed necessary to mount a rapid and effective response to an event that may pose a threat to the health and safety of users, as well as to City property and continuity of City operations.

RECOMMENDATIONS

- 3.2.1.C.** Considering the security studies that have already been conducted within the buildings for which they are responsible, we recommend that the boroughs of Anjou, Lachine and Côte-des-Neiges–Notre-Dame-de-Grâce implement the required emergency measures plans (FSP and SEP); ensure that they are updated; and provide measures for resumption of normal operations, in order to mount effective incident responses and ensure the security of users and assets and continuity of City operations.
- 3.2.1.D.** We recommend that the Service de la gestion et de la planification immobilière draw up a list of municipal buildings that require the Service de sécurité incendie to approve their fire safety plan, in order to comply with the provisions of the letter of agreement between SGPI and the Service de sécurité incendie.
- 3.2.1.E.** We recommend that the Service de la gestion et de la planification immobilière and the boroughs of Anjou and Lachine take steps to align Montreal fire safety clauses in lease agreements regarding buildings or parts of buildings and to provide the necessary monitoring mechanisms to ensure that landlords comply with them, so that the City can fulfill its due diligence responsibility with regard to the security of the buildings' users.
- 3.2.1.F.** We recommend that the boroughs of Anjou, Lachine and Côte-des-Neiges–Notre-Dame-de-Grâce register all their specific emergency plans in the Programme de gestion des mesures d'urgence dans les édifices municipaux (PGMUEM), in order to comply with the requirements of the City's Policy on Municipal building security.

BUSINESS UNITS' RESPONSES

- 3.2.1.C.** *Anjou borough*
 [TRANSLATION] After the studies conducted in conjunction with the Service de la gestion et de la planification immobilière have been completed, emergency measures plans (Fire Safety Plan and Specific Emergency Plan) will be developed jointly with the Service de la gestion et de la planification immobilière. Elements relating to the implementation, monitoring and maintenance of operations will be incorporated into the process. (Planned completion: December 2022)

Lachine borough

[TRANSLATION] After the studies conducted in conjunction with the Service de la gestion et de la planification immobilière have been completed, emergency measures plans (Fire Safety Plan and Specific Emergency Plan) will be developed jointly with the Service de gestion et de la planification immobilière. Elements relating to the implementation, monitoring and maintenance of operations will be incorporated into the process. **(Planned completion: December 2022)**

Côte-des-Neiges—Notre-Dame-de-Grâce borough

[TRANSLATION] After the studies conducted in conjunction with the Service de la gestion et de la planification immobilière have been completed, emergency measures plans (Fire Safety Plan and Specific Emergency Plan) will be developed jointly with the Service de la gestion et de la planification immobilière. Elements relating to the implementation, monitoring and maintenance of operations will be incorporated into the process. **(Planned completion: December 2022)**

3.2.1.D.**Service de la gestion et de la planification immobilière**

[TRANSLATION] A list of the buildings concerned will be established and compared with data from the Programme de gestion des mesures d'urgence dans les édifices municipaux. The Service de sécurité incendie de Montréal will be asked to validate and/or comment on fire safety plans pursuant to the 2006 letter of agreement. **(Planned completion: August 2019)**

3.2.1.E.**Service de la gestion et de la planification immobilière**

[TRANSLATION] In conjunction with the Division des locations of the Service de la gestion et de la planification immobilière, make a list of lease sites and ensure it is consistent with data from the Programme de gestion des mesures d'urgence dans les édifices municipaux. Subsequently, leases will be amended to include fire safety and physical safety clauses.

This information will be shared with the boroughs to provide them with input. **(Planned completion: March 2020)**

Anjou borough

[TRANSLATION] The borough will ensure that it uses the new lease documents to be developed by the Service de la gestion et de la planification immobilière and that each landlord complies with the elements relating to the monitoring mechanisms described in the leases. **(Planned completion: August 2019)**

Lachine borough

[TRANSLATION] The borough will ensure that it uses the new lease documents to be developed by the Service de la gestion et de la planification immobilière and that each landlord complies with the elements relating to the monitoring mechanisms described in the leases. (Planned completion: August 2019)

3.2.1.F.

Anjou borough

[TRANSLATION] As the Specific Response Plans outlined in recommendation 3.2.1.C. are completed, the designated official for each building will ensure that Specific Response Plans is incorporated into the Programme de gestion des mesures d'urgence dans les édifices municipaux system or any other new system that may be developed by the Service de la gestion et de la planification immobilière. (Planned completion: December 2022)

Lachine borough

[TRANSLATION] As the Specific Response Plans outlined in recommendation 3.2.1.C. are completed, the designated official for each building will ensure that Specific Response Plans is incorporated into the Program de gestion des mesures d'urgence dans les édifices municipaux system or any other new system that may be developed by the Service de la gestion et de la planification immobilière. (Planned completion: December 2022)

Côte-des-Neiges—Notre-Dame-de-Grâce borough

[TRANSLATION] As the Specific Response Plans outlined in recommendation 3.2.1.C. are completed, the designated official for each building will ensure that Specific Response Plans is incorporated into the Program de gestion des mesures d'urgence dans les édifices municipaux system or any other new system that may be developed by the Service de la gestion et de la planification immobilière. (Planned completion: December 2022)

3.2.2. REMOTE MONITORING

3.2.2.A. BACKGROUND AND FINDINGS

Remote monitoring is a security solution to protect facilities, equipment or individuals. This activity is performed through a monitoring station, to which alarm signals and camera-captured images are sent, to detect disruptive events in real time (e.g., fire, intrusions, hazardous material leaks) and respond promptly. For this component, our audit examined remote monitoring operations.

REMOTE MONITORING MANAGEMENT BY THE SERVICE DE LA GESTION ET DE LA PLANIFICATION IMMOBILIÈRE

According to the information we obtained, remote monitoring within SGPI is primarily focused on²⁷ the buildings of central departments and the nine boroughs from the former Ville de Montréal. Within SGPI, remote monitoring operations involve continuous interaction between the stakeholders of various administrative units, as illustrated in Table 5 below.

**TABLE 5 – SERVICE DE LA GESTION ET DE LA PLANIFICATION IMMOBILIÈRE
STAKEHOLDERS INVOLVED IN REMOTE MONITORING AND
RELATED ACTIVITIES**

REMOTE MONITORING MANAGEMENT BY THE SERVICE DE LA GESTION ET DE LA PLANIFICATION IMMOBILIÈRE ^[A]		
ADMINISTRATIVE UNITS INVOLVED		
Division des services administratifs, Section centre d'appels	Division de la Sécurité	Division de la gestion immobilière et de l'exploitation des bâtiments spécialisés – Région Ouest ^[A]
ACTIVITIES INVOLVED		
Centre opérationnel de sécurité	Patrol	Alarm system (fire and gas leaks - ammonia) maintenance
	Support and maintenance of security and data transmission systems	

^[A] Although it was not covered by our audit work, the Division de la gestion immobilière et de l'exploitation des bâtiments spécialisés – Région Ouest, reporting to the Direction de la gestion immobilière et de l'exploitation was considered for its role in maintaining some remote monitoring equipment.

Remote monitoring activities within SGPI can be summarized as follows:

- **COS:** the City monitoring station receives and processes signals (e.g., intruder alarms, fire, or hazardous material leaks) from security systems²⁸ and images captured by surveillance cameras installed in approximately 600 City buildings. Formerly managed by an officer of the Division de la sécurité, since January 1, 2018, COS has reported to the Section centre d'appels de la Division des services administratifs. COS is made up of a team of 12 security guards that provide 24/7 monitoring services for buildings connected to COS. Although this activity was excluded from the scope of our audit, it should be noted, for information purposes, that COS is also responsible for programming building access cards;

²⁷ A number of buildings managed by boroughs from former suburban municipalities are also connected to the SGPI monitoring station.

²⁸ They include control equipment and various sensors installed in buildings.

- **Patrol:** under the supervision of an officer and three sergeants, a team of 25 patrol officers from the Division de la sécurité is assigned to respond to the various incidents detected by COS. On the one hand, this patrol team responds to alarms throughout the Montreal area recorded by COS, first to confirm the alarm and then to take appropriate action. On the other hand, they also conduct surveillance rounds in some critical buildings (e.g., drinking water production plants, abandoned buildings);
- **Security system maintenance:** a team of 14 security and data systems technicians works at the Division de la sécurité to maintain these systems and ensure that they operate properly, with the exception of fire-related systems, whose maintenance, provided by eight other technicians, was transferred in January 2018 to the Division de la gestion immobilière et de l'exploitation des bâtiments spécialisés – Région Ouest.

Alarms received at COS are recorded and requests are forwarded to patrols who respond at the site. Security system technicians provide support for operations, especially security system and surveillance camera maintenance support. The interrelationship of COS stakeholders within the Section centre d'appels and Division de la sécurité stakeholders is therefore essential to ensure Municipal building security. Our audit work highlighted various problematic situations involving the following aspects of remote monitoring:

- Change management and division of roles and responsibilities;
- Security system access code management;
- Software and security system management;
- The COS succession plan.

CHANGE MANAGEMENT AND DIVISION OF ROLES AND RESPONSIBILITIES

For several years, SGPI has operated two call centres in separate administrative units, the Centre d'appels client²⁹ to receive corrective maintenance requests for buildings performed by the Divisions de la gestion immobilière et de l'exploitation des bâtiments spécialisés – Région Ouest and Région Est, and COS³⁰, which reported to the Division de la sécurité. As part of the organizational restructuring of SGPI, effective January 1, 2018, the two call centres were consolidated under the newly created Section centre d'appels reporting to the Division des services administratifs. According to the information we obtained, COS was transferred to this new section to improve customer service by responding to requests for urgent corrective maintenance that may be required in buildings at times that were not previously covered by the Centre d'appels client, thereby providing 24/7 service.

²⁹ The Centre d'appels client (872-1234) receives corrective maintenance service requests (e.g., breakages, breakdowns or malfunctions) for City buildings.

³⁰ Referring to the telephone line – (872-3017).

According to the information we obtained, this decision to remove COS from the Division de la sécurité was made without necessarily having consulted key Division de la sécurité stakeholders beforehand and without having addressed all the inconveniences this would cause in terms of support for its operations. In the opinion of Division de la sécurité stakeholders, COS is the clearinghouse for security issues. COS provides a wealth of information with regard to building security vulnerabilities. Now that it is part of an administrative unit whose primary mission is customer service, Division de la sécurité stakeholders are concerned that COS objectives may not be seamlessly aligned with Municipal building security priorities and are worried about some decisions made in silos by new COS stakeholders. In particular:

- historically, it appears that COS had agreed to assume responsibility for remote monitoring of buildings managed by some boroughs from former suburban municipalities. According to the information we obtained, under the new structure, COS officials apparently indicated their intention to discontinue this remote monitoring service for boroughs from former suburban municipalities because they are not covered by the SGPI service offering. Representatives of the Division de la sécurité were of the opinion that implementing such a decision immediately, without first implementing an alternative solution, would constitute an important security breach for the buildings involved. It was therefore decided that the planned action would be suspended.
- until November 2018, COS used radio communications to ensure the safety of patrols and security guards working the night shift, who are considered “lone workers³¹” (e.g., making sure that they are not injured, in danger or do not require assistance). Since then, the new COS leadership decided to stop assuming this responsibility because it felt that it was not part of a call centre’s duties, all the more so because they are not responsible for patrols and security guards. However, according to Division de la sécurité stakeholders, the concept of due diligence in occupational health and safety applies. If this task is stopped, without having planned and implemented an effective alternative, the safety of these lone workers may be compromised. Until an optimal solution is found, radio communications are used to ensure that lone workers are safe.

Based on the information we obtained, we note that in some respects the changes made to the organizational structure in terms of building safety include significant shortcomings, both in terms of operations management and human resources management. All the managers we interviewed deplore the fact that this change was made before the processes underlying the operational management of security activities were reviewed. Also, when we completed our audit work in February 2019, the division of roles and responsibilities between COS and the Division de la sécurité had not yet been formally clarified. This situation affects the relationships and cooperation between these two administrative units.

³¹ A worker is considered to be working alone when he is out of sight or out of earshot of other people; there is nobody to assist him, and he is performing dangerous work.

It should also be noted that, following the organizational restructuring within SGPI, security systems management, which was formerly performed by a single Division de la sécurité team, was assigned to two separate teams:

- a team of eight fire safety systems technicians (e.g., fire alarms, sprinklers) was transferred to the Direction de la gestion immobilière et de l'exploitation;
- a team of 14 security and data transmission systems technicians (e.g., video monitoring, access control, intrusion), who still report to the Direction de l'optimisation, de la sécurité et de la propreté (the Division de la sécurité).

The division of roles and responsibilities between these two administrative units for maintaining and repairing a variety of security equipment and systems connected to COS is shown in Table 6.

TABLE 6 – DIVISION OF ROLES AND RESPONSIBILITIES FOR MAINTAINING AND REPAIRING SECURITY EQUIPMENT AND SYSTEMS CONNECTED TO THE CENTRE OPÉRATIONNEL DE SÉCURITÉ (COS)^[A]

SECURITY COMPONENTS	NUMBER	RESPONSIBILITY FOR MAINTENANCE		
		DIRECTION DE LA GESTION IMMOBILIÈRE ET DE L'EXPLOITATION		DIRECTION DE L'OPTIMISATION, DE LA SÉCURITÉ ET DE LA PROPRIÉTÉ (DIVISION DE LA SÉCURITÉ)
		IN HOUSE	CONTRACTED	IN HOUSE
FIRE SAFETY				
Fire alarm system	329	196	133	-
Fire communicator (connected to the Centre opérationnel de sécurité)	329	196	-	133
AMMONIA LEAK DETECTION SYSTEM				
Ammonia leak detection system	21	21	-	-
Ammonia communicator (connected to the Centre opérationnel de sécurité)	21	21	-	-
INTRUSION DETECTION SYSTEM				
Intrusion alarm panel	587	-	106	481
Emergency buttons	231	-	-	231
VIDEO MONITORING				
Surveillance camera (connected to the recorder)	1,600	-	-	1,600
Recorder (connected to the Centre opérationnel de sécurité)	171	-	-	171
ACCESS CONTROL				
Controller (connected to the Centre opérationnel de sécurité)	136	-	-	136
Access card reader (connected to the controller)	1,100	-	-	1,100
Technical points ^[B]	255	-	-	255
TOTAL	4,780	434	239	4,107

^[A] Source: Compilation provided by the Division de la sécurité of the Service de la gestion et de la planification immobilière, in February 2019.

^[B] Technical points are used to monitor remote operation of equipment such as generators, nozzles, hazardous gas leak sensors, and fluid level (e.g., water, gasoline), temperature and humidity sensors.

According to the information we obtained for some City buildings, which are maintained and repaired in-house, fire safety technicians are responsible for ammonia leak detection systems (21), fire safety systems (196) and their respective communicators³². For the rest of the buildings, whose fire alarm systems are maintained and repaired under contract (133), the Division de la sécurité's technical team remained responsible for fire alarm system communicators. The same applies to intrusion systems, some of which are managed by the Direction de la gestion immobilière et de l'exploitation (106), while the remaining buildings are still managed by the Division de la sécurité (481).

There are complex, grey areas in handling some customer requests that require simultaneous involvement of various stakeholders, the scope of whose responsibilities is not always clearly defined (e.g., when an intrusion detection system under a maintenance contract needs to be reset, COS directs the request; the Direction de la gestion immobilière et de l'exploitation and its outside firm look after maintenance, and the Division de la sécurité is responsible for programming communication links).

It should be noted that new security system installations are completely outsourced as part of building projects for which other divisions of SGPI are responsible. However, Division de la sécurité technicians program these systems and their access codes (technicians and users). We were informed that they sometimes have to deal with significant system installation deficiencies (e.g., malfunctions, installations that are noncompliant or incompatible with the existing system) that require additional work. They deplore the lack of upstream coordination between the Division de la sécurité and the divisions responsible for implementing renovation or construction projects.

Under the circumstances, we believe that the Direction of the SGPI must issue clear security guidelines to ensure that the priorities of the Section centre d'appels, to which COS reports, and those of the Division de la sécurité can be properly aligned so that municipal building security is never compromised. Steps must be taken to clarify the division of roles and responsibilities of all the various stakeholders involved in security matters and to examine the potential for optimizing operations that promote effective coordination, both for security system installations during construction and renovation projects, and for subsequent maintenance and repair of these systems.

RECOMMENDATION

3.2.2.B. We recommend that the Service de la gestion et de la planification immobilière clarify the division of roles and responsibilities of all stakeholders involved in remote monitoring and examine the potential for optimizing related operations, so that they can be appropriately coordinated to enable sound Municipal building security management.

³² A communicator is a device used to connect the system to the COS station.

BUSINESS UNIT'S RESPONSE

3.2.2.B. *Service de la gestion et de la planification immobilière*
[TRANSLATION] In conjunction with the Division des services administratifs of the Service de la gestion et de la planification immobilière, define activities related to remote surveillance as well as the stakeholders' role.

*During this process, potential optimization solutions will be assessed.
 (Planned completion: November 2019)*

SOFTWARE AND SECURITY SYSTEM MANAGEMENT

To perform its work, COS operates a series of software and computer databases, whose functions include receiving and directing reported intrusions and fire alarms, creating and processing requests assigned to patrols and technicians on duty, creating and providing consulting services for response procedures and producing reports for security management analysis and decision-making.

According to the information we obtained, some of the software and databases used by COS were developed internally several years ago by Division de la sécurité technical “developers”. Apparently, the City’s Service des technologies de l’information was never involved in developing and supporting these databases and software. However, it seems that there are significant deficiencies in managing the software and security systems that COS uses for its operations. In particular:

- SGPI currently has no expertise available to update or develop existing security systems. In fact, the developers who operated the systems and databases are no longer employed by the City and they were not replaced before they left;
- in some cases, the Division de la sécurité team of technicians who provide support for some software programs operated by COS has no access code to maintain them. Also, these software programs require special programming expertise³³, which neither COS nor Division de la sécurité staff have. These issues involve a critical software program called the Integrated Collection and Operations System (ICOS), which is used to create queries, manage work in progress and record building incident response procedures;
- it was pointed out that some technical security system equipment is obsolete (e.g., recorders, cameras, card readers). Maintenance and upgrading of this equipment have been neglected in recent years;
- the lack of coordination between the Division de la sécurité and other SGPI administrative units responsible for planning and implementing construction and renovation projects means that equipment that is supposed to be installed is not necessarily compatible with existing systems.

³³ Reference was made to “Microsoft Access®”.

Also, with respect to the information relating to the type of alarms recorded at COS, we were told that it is possible to generate reports on the number and type of alarms reported. COS processed approximately 60,840 alarms between January 1 and July 20, 2018. Although this management information is relevant, it appears that it is not easy to generate reports with more detailed management information (e.g., statistics by reported alarm type and frequency per building, number of requests processed or being processed in response to incident reports). According to the information we obtained, this situation could be attributable either to limitations of the existing software or the absence of incident response data.

We were told that queries generated using the ICOS application, for incidents reported to COS that require on-site patrols to respond, are not all routinely well documented. Alarms triggered inadvertently or due to negligence in a given building (e.g., incorrect security code, doors left unlocked or ajar) are considered “*false alarms*”. This type of incident is not always documented in the system, although a patrol had to go check the alarm, identify the problem and secure the site. This situation is also valid for items noted during weekly preventive rounds performed by patrols. In fact, it is difficult to quantify the preventive rounds during which patrols identified unsafe situations and incidents were avoided (e.g., windows or doors left open or alarm systems not turned on). Patrols report details of their activities on their daily round sheets, and although sergeants in charge review the sheets in order to correct the causes of reported incidents, the fact remains that this information is recorded on paper and is not entered in ICOS, which means the information cannot be used to provide an overview.

In short, because COS is at the heart of remote monitoring of security in municipal buildings, it is essential that the technological tools and operational activities that support monitoring are always effective. All the stakeholders we interviewed believe that the vulnerabilities mentioned (e.g., technological tools and continuous technical assistance) were among the factors that put building security at risk in the event of a significant software or security system malfunction. Under the circumstances, we believe that SGPI management must provide clear guidelines to address these vulnerabilities by implementing appropriate remedial measures that will ensure the security of City buildings at all times. Also, it is undeniable that analyzing data that can be extracted from systems provides very useful information for identifying security breaches and vulnerabilities within buildings and then implementing necessary corrective measures. However, given the lack of documentation and the limitations of existing systems, representatives of the Division de la sécurité may find it more difficult to perform a comprehensive analysis and report on the status of security in City buildings. We therefore believe that solutions must be quickly considered so that the technological tools that are used can ultimately provide complete and reliable management information to support informed decision-making.

RECOMMENDATION

3.2.2.C. We recommend that the Service de la gestion et de la planification immobilière take the steps needed to ensure that technological tools and operational activities supporting remote monitoring are effective, in order to enable continuous monitoring of Municipal building security, and to collect management information that can be used for informed decision-making.

BUSINESS UNIT'S RESPONSE

3.2.2.C. *Service de la gestion et de la planification immobilière*
[TRANSLATION] Conduct an inventory and assessment of the status of the Centre opérationnel's equipment and software with the Service de la gestion et de la planification immobilière's Division du bureau de projet, the Gestion de l'information and the Division des services administratifs. (Planned completion: November 2019)

Following this exercise, in conjunction with the Service des technologies de l'information, identify the resources needed to optimize systems and keep them up to date. Develop an implementation plan for optimizing technological tools. (Planned completion: to be determined)

MANAGEMENT OF REMOTE MONITORING BY BOROUGHES FROM FORMER SUBURBAN MUNICIPALITIES (ANJOU AND LACHINE)

It should be noted that boroughs from former suburban municipalities are responsible for remote monitoring of the buildings they manage.

With regard to the Anjou borough, the information we obtained reveals that a private firm has been contracted to remotely monitor intrusion and fire alarm systems in the borough's buildings. Borough employees are available 24/7 to answer calls from the central monitoring station, reporting that alarms have been triggered in the buildings. The supervisor on duty must travel to the sites to confirm the alarms and take appropriate action. We are told that the established response procedure is not documented.

Cameras are also installed in some of the busiest buildings. Images captured by these cameras are available for viewing in the event of incident investigations subject to approval of the information technology team leader, who is responsible for video monitoring management. It should be noted that "*Public video surveillance regulations*"³⁴ stipulate the authorizations required to view images from a remote monitoring system and the obligation that members of the public welcomed in an area under video surveillance

³⁴ Source: Commission d'accès à l'information du Québec.

must be informed. Based on the information we obtained, we note that the responsible stakeholders were aware of current regulations. The regulations set out rules regarding the authorizations required to view images from a remote monitoring system and the obligation that members of the public welcomed in an area under video surveillance must be informed.

As for the Lachine borough, remote monitoring is also awarded to an outside firm. Procedures are in place for reporting alarms to responsible building staff. A list containing the contact information of responders to be contacted upon receipt of alarm signals has been established. However, the stakeholders we interviewed stated that the list is not up to date and that the incident response procedure is not documented.

Surveillance cameras have been installed in the buildings. However, they are not connected to a central station and captured images are not viewed in continuous mode. Instead, they are recorded on video tapes for use in investigating alarms or mischief. However, images captured by these live cameras can be viewed, as required. In this regard, we note that borough representatives are aware of current video surveillance regulations.

Our audit work did not include a thorough analysis of remote monitoring management in the boroughs of Anjou and Lachine. However, we are of the opinion that the boroughs should reassess the resources put in place to remotely monitor their respective buildings, based on any vulnerabilities identified in previous security studies (as recommended in section 3.1.4.). In addition, response procedures upon receipt of alarm signals must be documented in accordance with ERPs that has been developed for borough buildings (as recommended in section 3.2.1.).

RECOMMENDATIONS

3.2.2.D. We recommend that the boroughs of Anjou and Lachine reassess the effectiveness of resources in place to remotely monitor their respective buildings, based on vulnerabilities previously identified by security studies, in order to ensure their security.

3.2.2.E. We recommend that the boroughs of Anjou and Lachine develop documented and up-to-date response procedures, consistent with previously established building emergency response plans, to provide guidance on processing incoming alarm reports and thereby promote prompt, effective incident responses.

BUSINESS UNITS' RESPONSES

3.2.2.D.

Anjou borough

[TRANSLATION] Following the risk analysis, the Service de la gestion et de la planification immobilière will prepare frameworks, and the borough will ensure that current practices comply with them.

(Planned completion: December 2019)

Lachine borough

[TRANSLATION] Following the risk analysis, the Service de la gestion et de la planification immobilière will prepare frameworks, and the borough will ensure that current practices comply with them.

(Planned completion: December 2019)

3.2.2.E.

Anjou borough

[TRANSLATION] Emergency plans developed pursuant to recommendation 3.2.1.C. will describe the procedure to be followed when an alarm is received. (Planned completion: December 2019)

Lachine borough

[TRANSLATION] Emergency plans developed pursuant to recommendation 3.2.1.C. will describe the procedure to be followed when an alarm is received. (Planned completion: December 2019)

3.2.3. CONTROLLED LOCKSMITHING

3.2.3.A. BACKGROUND AND FINDINGS

Locksmithing management is one of the activities that help ensure the security of occupants and property by controlling keys that provide access to the building or parts of the building.

Locksmithing, like building access control, can include the distribution and control of two types of keys:

- regular keys for normal use (e.g., office door, closet), which can be easily duplicated;
- high-security keys protected by a patent, which can only be reproduced (a unique code) by an authorized manufacturer, with the approval of designated officials within the organization. Such keys ensure greater access security, usually at more strategic locations (e.g., a hazardous material warehouse). They can also be used to provide a limited number of people with access to various buildings or parts of a building (a master key), while limiting access to other areas (e.g., access to electrical control rooms or mechanical rooms).

Effective locksmithing management must meet the following prerequisites:

- City standards have been previously established for situations requiring the use of controlled key locks;
- a key control list has been established for each building, i.e., a checklist that includes all doors and their keys. Given the sensitive information they contain, access to an organization's key control lists is expected to be limited to the designated locksmith;
- guidelines have been developed and distributed to govern the use, distribution, retrieval or replacement of keys;
- a key management and tracking system has been introduced.

Also, it should be noted that locksmithing activities are regulated and require a locksmith permit issued by the Bureau de la sécurité privée (BSP).

Our audit work reviewed the regulations governing controlled locksmithing management within each audited business unit.

It should be noted at the outset that the Division de la sécurité of the SGPI is responsible for controlled locksmithing management in buildings operated by the central departments and the nine boroughs from the former Ville de Montréal³⁵. Boroughs from former suburban municipalities are responsible for (regular and controlled) locksmithing management within buildings under their jurisdiction.

LOCKSMITHING MANAGEMENT BY THE SERVICE DE LA GESTION ET DE LA PLANIFICATION IMMOBILIÈRE

According to the information we obtained, it appears that controlled locksmithing was originally established without any standards governing the use of controlled key locks or that controlled key lock management guidelines had not been established beforehand. Over time, the growing demand for controlling access to sensitive facilities, coupled with countless transformations in the organizational structure, transfer of responsibilities and numerous transfers within the same unit complicated controlled locksmithing within the City.

Given the size of the City's building inventory, the lack of guidelines for effective locksmithing management is a serious matter. Because controlled keys have been distributed without following a structured protocol and keeping track of keys in circulation, it appears

³⁵ For information purposes, it should be noted that within SGPI, the Direction de la gestion immobilière et de l'exploitation is the department responsible for regular locksmithing management, not the Direction de l'optimisation, de la sécurité et de la propreté.

that some controlled keys (including master keys³⁶) are now in circulation, but their owners are unknown. All the stakeholders interviewed within SGPI agree that the situation is quite troubling because it seriously compromises security in City buildings.

In addition to this security breach, the information we obtained indicates that controlled locksmithing management for which SGPI is responsible, also has other major deficiencies including:

- **Overuse and improper use of controlled keys:** although controlled key locks should be used exclusively for high security level access or to provide access to a limited number of persons, as applicable, the information we obtained indicates that in the absence of guidelines, controlled keys have been used for purposes that do not require a high level of security (e.g., for closets or office doors). This situation is very odd because controlled keys are more expensive than regular keys and require special management;
- **Complicated key control lists:** the inventory of key control lists within the Division de la sécurité is stored on three different types of media (approximately 8,000 key control lists are on paper, 559 are on Excel spreadsheets and 415 are stored on a locksmithing software application). These figures provide an indication of the size and complexity of the City's locksmithing operations. For information purposes, each key control list outlines the key tree within a building, including the key code, matching lock, the access they provide and the number of keys in circulation. What complicates matters is that there are currently three generations of controlled keys (i.e., three different patented technologies) in circulation in the City. In some cases, all three generations have been used in the same building, which means the building needs three different key control lists;
- **No successors:** for several years, controlled locksmithing was managed by a single SGPI locksmith (key master), until he retired in June 2018. Although everyone knew he was about to leave, nobody was found to replace him. Since the end of 2018, the locksmith's responsibilities were temporarily assigned to one of the newly recruited Division de la sécurité advisors. First, this resource does not have the appropriate BSP permit authorizing him to fully manage this activity. Second, considering the issues mentioned above, it appears that controlled locksmithing management is a heavy workload for this resource whose security consulting expertise is not being fully exploited;
- **Delays in processing requests for controlled keys:** SGPI client business units must contact the Division de la sécurité directly for all controlled key requests. At the time of our audit, we were informed that a considerable backlog (approximately eight months) had accrued in processing customer requests for the installation of new high-security locks for renovation projects. The stakeholders we interviewed in the CDN-NDG borough reported that there is a large backlog of requests for keys and that this affects management of their own operations (e.g., time wasted on implementing temporary solutions to control access to buildings);

³⁶ Within the City, master keys provide access to all sections of a building and all buildings of the same type (e.g., arenas or pools), or even different types of facilities (e.g., electrical control rooms and mechanical rooms).

- **Lack of coordination among the various SGPI administrative units:** the stakeholders we interviewed at the Division de la sécurité indicate that locksmithing management issues are also noted during the implementation of construction and renovation projects. Although we did not perform a review, it was mentioned that standard specifications used by SGPI for awarding contracts call for the installation of the same controlled key technology, which may not necessarily be updated. Given these considerations, security experts within the Division de la sécurité are apparently not routinely consulted or are consulted too late when the work has almost been completed.

We find these locksmithing management shortcomings within SGPI troubling, to say the least. There is no doubt that this activity must be reassessed in the near future and steps must be taken to correct the situation so that this security measure, along with a complementary set of measures, achieves the objectives as a means of protecting occupants and property in municipal buildings.

LOCKSMITHING MANAGEMENT IN BOROUGHS FROM FORMER SUBURBAN MUNICIPALITIES (ANJOU AND LACHINE)

According to the information we obtained from people interviewed in the Anjou borough, two foremen were put in charge of locksmithing management. We find that locksmithing activities (e.g., production, distribution and tracking of keys in circulation) are not managed in accordance with established guidelines or frameworks, but rather various informal practices introduced over time. In particular:

- controlled locksmithing is used mainly to control access to the perimeter of buildings and limit access to some areas within them including critical facilities. Each administrative unit head is responsible for defining the rules for limiting such access and the rules are not necessarily documented;
- keys are produced and distributed only upon approval of a request from building officials. A specialized firm produces controlled keys. It appears that employees who have these keys subsequently become responsible for tracking them without further control on the part of the persons designated to manage this activity;
- keys in circulation are not tracked on a regular basis.

It should be noted that an exception applies to the previously described operating procedure for one of the buildings in the borough. We found that there was a specific locksmithing management guideline for the building. It covered identification of key holders, assignment of keys and the lost key procedure. We also noted another procedure for processing access card applications and the procedure for monitoring controlled keys lent on a temporary basis. According to the information we obtained, these guidelines come from the borough's information technology team, which has also set up a computer application for managing keys in circulation for this building.

In our opinion, in the absence of formal locksmithing management guidelines, the borough is exposed to the risk of compromising the security of its facilities. This is why we believe that steps will have to be taken to tighten locksmithing management.

Regarding the Lachine borough, the officials we interviewed informed us that locksmithing management is the responsibility of the borough locksmith who has the accreditations required by the BSP. The borough locksmith has exclusive access to a secure room containing key control lists and key-cutting machines for making regular keys. Controlled keys used primarily for building perimeter access are produced by an external supplier with the required licences.

The information we obtained revealed that since 2015 there has been a procedure for borrowing keys, which provides for approval of the request by designated officials within the borough and, finally, a penalty for failing to return a borrowed key. It appears that this procedure is not closely monitored. It is also apparent from the information provided to us that no other formal locksmithing management guidelines have been established (e.g., procedures for distribution, recovery or replacement of keys). The people we interviewed mentioned that the procedure for requesting keys is known, but it has not been formalized. The locksmith, in office for several years, says that his role is limited because he does not have authority or oversight over the distribution of keys. He says he has not been authorized to manage locksmithing, only to make copies of (regular) keys and unlock doors when required. However, all locksmithing management should be performed by a qualified person. It was also mentioned that the following aspects of locksmithing management should be improved:

- Tracking of keys in circulation is generally very deficient in many respects (e.g., the lack of a key inventory for each building, the number of keys in circulation and a list of holders who are not necessarily known);
- All borough tradesmen and foremen have controlled keys for access to all buildings. Also, managers have sets of keys to buildings for which they are responsible. The outside organizations that operate the buildings also have these keys. However, the large number of persons who have controlled keys, combined with weaknesses in monitoring keys in circulation, increase the risk that the security of the borough's buildings may be compromised;
- We were informed that the borough locksmith planned to retire in January 2019. According to the information we obtained, although there were plans to assign another resource to assume the locksmith's responsibilities, no steps had been taken to replace the locksmith at the time of our audit work. Based on the comments received from the person responsible for replacing the locksmith, we note that he was not aware of the need to implement guidelines and procedures for defining locksmithing management or the requirements of the BSP and qualifications required for performing this work.

In short, we generally find that there are significant, even troubling, deficiencies in locksmithing management in the City that could seriously compromise the security of buildings,

users and continuity of City operations. Considering that Municipal building security is a strategic issue, we feel it is essential that the situation be corrected, starting with critical buildings. A profile of locksmithing management in the City should be produced and reviewed. The locksmithing management guidelines should then be established along with a response strategy with regard to corrective measures to be taken to rectify any security breaches that have been identified.

RECOMMENDATIONS

3.2.3.B. We recommend that the Service de la gestion et de la planification immobilière work with all City business units to produce a status update and perform the required locksmithing management review, in order to reflect the City's standards, and to establish a short-term response strategy to mitigate security breaches and ensure security within municipal buildings and continuity of operations.

3.2.3.C. We recommend that the Service de la gestion et de la planification immobilière and the boroughs of Anjou, Lachine and Côte-des-Neiges–Notre-Dame-de-Grâce establish and distribute locksmithing operations management guidelines (e.g., key use, distribution, retrieval, replacement and tracking) and produce a locksmithing succession plan in order to promote effective locksmithing management.

3.2.3.D. We recommend that the Service de la gestion et de la planification immobilière and the Lachine borough take the necessary steps to assign locksmithing management to qualified personnel who have the certifications required by the Bureau de la sécurité privée, in order to ensure that locksmithing management is in compliance and to promote consistent, effective management.

BUSINESS UNITS' RESPONSES

3.2.3.B. *Service de la gestion et de la planification immobilière*
 [TRANSLATION] An analysis is under way with an external firm in order to produce a comprehensive overview and make recommendations. This work and the policy directions will be presented at a committee meeting that will include the Direction de la gestion immobilière et de l'exploitation and the boroughs. **(Planned completion: September 2019)**

Subsequently, a response strategy that includes an access management vision and an action plan will be implemented to minimize security breaches and deliver a sustainable and effective solution.
(Planned completion: March 2020)

Implementation of the response strategy for all buildings. (Planned completion: to be determined)

3.2.3.C.

Service de la gestion et de la planification immobilière

[TRANSLATION] An administrative framework will be developed in conjunction with the various stakeholders involved in controlled locksmithing activities. The framework will be distributed to the various business units. In addition, the roles and responsibilities for locksmithing activities are under review in response to the labour shortage in this area of expertise. (Planned completion: December 2019)

Anjou borough

[TRANSLATION] Because the Service de la gestion et de la planification immobilière will review the locksmithing management model and related practices (an administrative framework will be developed), the borough will ensure that these changes are incorporated into practices and monitored. Responsible for all buildings except the Ville de Montréal city hall. (Planned completion: December 2021)

Lachine borough

[TRANSLATION] Because the Service de la gestion et de la planification immobilière will review the locksmithing management model and related practices (an administrative framework will be developed), the borough will ensure that these changes are incorporated into practices and monitored. (Planned completion: December 2019)

Côte-des-Neiges—Notre-Dame-de-Grâce borough

[TRANSLATION] Because the Service de la gestion et de la planification immobilière will review the locksmithing management model and related practices (an administrative framework will be developed), the borough will ensure that these changes are incorporated into practices and monitored. (Planned completion: December 2019)

3.2.3.D.

Service de la gestion et de la planification immobilière

[TRANSLATION] The whole activity is being reviewed. The Direction de l'optimisation de la sécurité et de la propreté's structure has been modified to respond effectively to requests.

As specified in 3.2.3.B. and 3.2.3.C., new policy directions will be submitted before the end of the year. (Planned completion: September 2019)

Lachine borough

[TRANSLATION] The borough will ensure that this activity is assigned to a person with the required certifications. (Planned completion: September 2019)

3.2.4. GUARD SERVICES

3.2.4.A. BACKGROUND AND FINDINGS

Guard services are provided by security guards who monitor facilities to protect persons, assets or sites by maintaining order, ensuring that users comply with rules and preventing crime. Security guards must perform security rounds, control access, monitor elevators or even monitor surveillance cameras. Guards can also act as first responders in case of trouble in the building.

Given that the City operates buildings that are used for various purposes (e.g., sports centres, industrial, administrative or scientific buildings), it is important that guard services respond to the specific requirements of these buildings. The requirements include:

- building protection needs in terms of guard services are defined;
- a protection plan (e.g., number of resources and guard time) is established;
- guidelines for the tasks to be performed by security guards are defined;
- guard service performance is monitored (regular on-site monitoring by outside firms and/or the client).

Our audit work reviewed how this activity was managed in City buildings.

GUARD SERVICES MANAGEMENT BY THE SERVICE DE GESTION ET DE LA PLANIFICATION IMMOBILIÈRE

We should first mention that the Division de la sécurité provides security services for buildings managed by central departments, former Ville de Montréal boroughs, and some buildings managed by boroughs from former suburban municipalities. With the exception of one City building for which 25 security guards (blue-collar workers) provide security, contracts are awarded to outside firms to provide guard services for other buildings managed by SGPI. These contracts are managed by two Division de la sécurité officers.

For in-house guard services, we noted that a person had been appointed to manage guard services; guard service requirements had been defined and that guidelines and procedures had been developed and implemented.

With respect to security guard operations awarded to outside firms, we examined two of the five security contracts in effect at the time of our audit. The details of these contracts are shown in Table 7.

TABLE 7 – GUARD SERVICE CONTRACTS REVIEWED

SUCCESSFUL BIDDER	CONTRACTS	AMOUNT (WITH TAXES)	CONTRACT DURATION	BENEFICIARIES	DESCRIPTION
Firm A	1	\$7.9 M	March 31, 2018 to May 4, 2021	1 regular client	4 facilities
	2	\$5.6 M	May 5, 2018 to May 4, 2021	8 regular clients Miscellaneous clients	Regular clients with one or more facilities Bank of 33,000 hours per year, used for: • additional requests from regular customers • one-time requests from non-regular customers

We reviewed the technical specifications included in the tender documents of the two contracts and had questions regarding the type of contract awarded to the successful bidder. We find that the detailed description of expectations in the contract are akin to requirements in a complete facility security management contract, rather than just guard services. In addition to setting up a security patrol system and providing the necessary equipment (a punch system) to monitor rounds, the contracts stipulate that the successful firm must:

- assess and update the risks associated with assets and problem situations;
- establish, update and implement protection plans;
- develop and maintain response protocols, evacuation procedures and operational procedures.

According to us, it is fair to believe that many of the tasks assigned to the firm should have been developed in accordance with the standards set by the City with respect to the characteristics of its building inventory. Division de la sécurité officers responsible for managing guard service contracts confirm that the successful outside firm is expected to introduce and implement a comprehensive facility security plan. It appears that the decision to relinquish this responsibility was made primarily because of the lack of resources within the Division de la sécurité.

We find that some of the buildings covered by the contracts we reviewed are critical facilities whose operations are particularly complex. The contract awarded to the outside firm involves a heavy workload in terms of understanding the operations of the various business units, analyzing the particular issues of each building, and implementing appro-

appropriate security measures, procedures and an operational management team. According to the information we obtained, the firm also needs to provide support during a significant break-in period, so that everything is fully operational. Given the short contract timeframes, it goes without saying that at the end of these contracts, a new contractor will have to develop security expertise for these critical facilities and implement its own operating procedure. According to the information we obtained, procedures established by the firms are supervised by Division de la sécurité officers responsible for this activity, and service delivery is monitored (e.g., regular site visits, spot checks, guard reports and incident reports). However, by assigning these tasks to outside firms, the City may lose internal expertise in terms of specific security for its buildings, some of which are particularly critical. This approach also entails the following risks:

- Outside practice guidelines that may not meet City security standards;
- Security measures implemented by the firm that may not fully respond to the building's inherent risks and specificities;
- Relevant historical building security data may be lost and not be incorporated into the City's security management systems;
- A break in continuity when security management is transferred from one firm to another.

For these reasons, if the objective is to award security contracts to outside firms, we are of the view that tender documents should at least refer to internal guidelines and procedures based on previous security studies for the buildings concerned, in accordance with City security standards.

As for the section of one of the contracts relating to banked hours (33,000 hours per year), we were informed that it was estimated based on hours used in the past to respond to one-time guard service requests from non-regular customers or to meet additional needs of regular customers. Upon receipt of requests, Division de la sécurité officers assess security requirements, and then, if necessary, requirements are defined in procedures and guidelines that security guards will be required to follow, and which will be monitored to ensure service delivery.

However, due to the unpredictability of some guard service requests (e.g., extra security required during a public event, a security system failure), the estimated number of hours specified in the contract is sometimes insufficient. As a result, SGPI is not always able to provide the security services requested by the City's business units covered by its service offering. In the opinion of the various stakeholders we interviewed, this issue affects customer service and the Division de la sécurité's image.

We believe that a more stringent process will have to be established so that SGPI, in conjunction with all the business units covered by its service offering, can identify security service requirements and more accurately estimate the number of contract hours and the budget for these activities.

RECOMMENDATIONS

- 3.2.4.B.** We recommend that the Service de la gestion et de la planification immobilière reassess the process for awarding security service contacts to outside firms in order to ensure guard services are performed in accordance with building security studies and standards previously established by the City.
- 3.2.4.C.** We recommend that the Service de la gestion et de la planification immobilière, in conjunction with all business units concerned, implement a process for identifying guard service requirements and to more accurately estimate security service budgets so that it can provide services to client business units.

BUSINESS UNITS' RESPONSES

- 3.2.4.B.** **Service de la gestion et de la planification immobilière**
 [TRANSLATION] Following a discussion with the boroughs and central departments on guard service operations, define the level of service expected as well as the requirements stipulated in the calls for tenders. Subsequently, in conjunction with the Service d'approvisionnement, propose a contract management model responsive to guard service requirements. (Planned completion: March 2020, in connection with 3.1.4.B.)
- 3.2.4.C.** **Service de la gestion et de la planification immobilière**
 [TRANSLATION] Ensure that service requests are followed by a security audit between the Division de la sécurité and the business units, so that actual needs can be addressed and budgeted for accordingly.
- Following a discussion with the boroughs and central departments on guard service operations, define the level of service expected as well as the requirements stipulated in the calls for tenders. Subsequently, in conjunction with the Service d'approvisionnement, propose a contract management model responsive to guard service requirements. (Planned completion: March 2020, in connection with 3.2.4.B.)

MANAGEMENT OF GUARD SERVICES BY BOROUGHS FROM FORMER SUBURBAN MUNICIPALITIES (ANJOU AND LACHINE)

For this component, we found that the boroughs of Anjou and Lachine provide security for some of their buildings.

In the case of the Anjou borough, this activity is performed in one building under a contract awarded to a firm to provide services on a regular basis. A procedure and guideline established by the borough must be followed by security guards, who report to a company supervisor. Service delivery is monitored by a designated borough official.

As for the Lachine borough, at the time of our audit work, guard services were provided under a contract (hours banks) awarded to an outside firm. This contract is for the provision of guard services on a regular basis for three buildings and occasionally for three other facilities. A designated officer is responsible for managing the contract while security requirements for each building are determined by the building operators.

For one of the three buildings receiving guard services on a regular basis, we obtained evidence of existing procedures and guidelines and a guard services schedule based on the building's business hours. Service delivery is monitored by a supervisor from the outside firm. Daily reports as well as response reports, if any, are sent to the designated building official. As for the other two buildings, we note that there are no guidelines or documented procedures regulating the firm's security guard services. According to the stakeholders we interviewed, assigned security guards are familiar with the facilities and operations within these buildings, and the building official gives them specific instructions on an informal basis, as needed (e.g., limiting access to a temporarily closed section of the building, performing an extra round in isolated areas at peak times).

Finally, for three other facilities where security services are occasionally required during events, we note that the borough has not issued any documented procedures for supervising this activity. According to the information we obtained, it appears that front-line employees are responsible for managing guard service activities, although they may not necessarily have the required expertise in this area. When the services of a firm are required, a meeting is planned with the security guard assigned by the firm to tour the site, provide instructions and present the regulations to be followed by users.

In our opinion, the Lachine borough would benefit from having specific procedures and guidelines for each of its facilities requiring guard services. The guidelines would ensure delivery of services that respond to the risks and characteristics of buildings and that can easily be monitored. This would also help ensure continuity of expected guard services, regardless of the assigned employee or the outside firm providing the services.

RECOMMENDATION

3.2.4.D. We recommend that the Lachine borough develop specific procedures and guidelines for each of its facilities requiring guard services, in order to ensure guard service delivery that responds to the risks and specificities of the buildings and to allow services to be monitored and implemented on an ongoing basis.

RÉPONSE DE L'UNITÉ D'AFFAIRES

3.2.4.D. *Lachine borough*
[TRANSLATION] The borough will participate in the discussion process on guard service operations initiated by the Service de la gestion et de la planification immobilière with the boroughs and central departments, in order to define the expected level of service and the requirements to be stipulated in the calls for tender.

The borough will ensure that security guards responsible for local guard services are sent to the framework that will be produced subsequent to this joint approach. (Planned completion: March 2020)

3.3. REPORTING

3.3.A. BACKGROUND AND FINDINGS

Given that the City views Municipal building security as a strategic issue, it is important that the management of security measures include the introduction of appropriate reporting mechanisms. These should enable managers and, ultimately, City authorities to assess the extent to which established building security objectives have been achieved and, if applicable, guide decision-making accordingly. To this end, management reports should be produced periodically. They include relevant information to assess the adequacy and effectiveness of existing security.

It should be noted that the Policy and Guideline outline reporting requirements. They stipulate that:

- each borough director and each department manager must submit a report to SGPI on his action plan for the previous year and an action plan for the current year aimed at developing, implementing and updating security programs validated by SGPI;
- at the beginning of each year, the director of SGPI must file a comprehensive report with the city manager on management of security in municipal buildings and buildings or parts of buildings leased by the City.

According to the information we obtained, because the Security Policy has not been implemented since the Direction générale adopted it in 2014, no action plans or reports have been obtained from the City’s business units. SGPI has never filed a comprehensive report on Municipal building security management.

As a result, it should be noted that SIM and SGPI entered into a service agreement in 2006, under which SIM delegated to SGPI responsibility for producing FSPs for municipal buildings³⁷. Although the agreement stipulated that the Division de la sécurité was to send SIM an annual report on the activities of the PGMUEM, it appears that to date no steps have been taken to comply with this requirement.

In our opinion, SGPI will need to take the steps needed to ensure that it complies with the annual reporting requirements set out in the Policy and Guideline on reporting as well as the requirement set out in the agreement entered into with SIM, as mentioned above. This also applies to the boroughs of Anjou, Lachine and Côte-des-Neiges–Notre-Dame-de-Grâce, which will have to make the necessary arrangements to report on security within the buildings they manage, in accordance with the requirements of the current Policy.

At the operational level, we noted that the Division de la sécurité produced reports on remote monitoring and guard service activities (e.g. weekly security rounds reports by patrols and security guards, reports on the number of alarms recorded by COS). Aside from this, the information we obtained from the managers we interviewed shows that reporting on the various Municipal building security activities is primarily done verbally during informal meetings held from time to time. The situation is similar in the boroughs we audited, where building security activities are managed in silos within their various administrative units, and formal building security reporting mechanisms have not been established.

We are of the view that, depending on existing policies, operational management of Municipal building security activities must be discussed to identify objectives and performance indicators. Since security is a strategic issue, it goes without saying that all City business units will have to contribute to achieving the same objectives. We believe it is appropriate that a dashboard be developed and produced periodically to guide managers in their decision-making for implementing the necessary corrective measures to protect users and assets and ensure continuity of City operations.

RECOMMENDATIONS

3.3.B. We recommend that the Service de la gestion et de la planification immobilière and the boroughs of Anjou, Lachine and Côte-des-Neiges–Notre-Dame-de-Grâce implement the necessary mechanisms to meet the reporting requirements set out in all signed agreements and the Policy on Municipal building security.

³⁷ Reference: section 3.2.1. “Emergency Measures Plan” of this report.

- 3.3.C. We recommend that, as a mandatory, the Service de la gestion et de la planification immobilière ensure Municipal building security, identify objectives and performance indicators for operational management of security activities in accordance with SGPI policies, and develop a dashboard to guide managers in their decision-making to ensure sound management and to provide the city manager with management reports.**

BUSINESS UNITS' RESPONSES

- 3.3.B. *Service de la gestion et de la planification immobilière***
[TRANSLATION] In conjunction with the Bureau du contrôleur général, implement audit mechanisms to ensure that the units comply with the Policy. Subsequently, develop a reporting process for business units. Finally, audits will be conducted by building priority in accordance with the criteria set out in the Policy on Municipal building security. (Planned completion: December 2021)

Anjou borough

[TRANSLATION] The borough will ensure that it complies with the reporting requirements that will be established as part of the planned collaborative work between the Service de la gestion et de la planification immobilière and the Bureau du contrôleur général. (Planned completion: December 2021)

Lachine borough

[TRANSLATION] The borough will ensure that it complies with the reporting requirements that will be established as part of the planned collaborative work between the Service de la gestion et de la planification immobilière and the Bureau du contrôleur général. (Planned completion: December 2021)

Côte-des-Neiges—Notre-Dame-de-Grâce borough

[TRANSLATION] The borough will ensure that it complies with the reporting requirements that will be established as part of the planned collaborative work between the Service de la gestion et de la planification immobilière and the Bureau du contrôleur général. (Planned completion: December 2021)

- 3.3.C. *Service de la gestion et de la planification immobilière***
[TRANSLATION] Identify performance indicators related to the policy directions issued by the Direction générale. Subsequently, collect data from the boroughs and central departments. (Planned completion: September 2019)

Every year, a dashboard providing a visual representation of this exercise will be submitted to the Direction générale. (Planned completion: annually)

4. CONCLUSION

The Ville de Montréal (the City) owns a large building inventory made up of various types of buildings used by citizens, municipal employees and visitors. Thousands of people use these buildings on a daily basis.

To protect occupants, there are legal provisions governing various aspects of building security, which may be limited to the requirement to develop and maintain a fire safety plan for each building. Under these circumstances, Municipal building security management must be organized effectively to ensure compliance with laws and regulations, but most importantly to ensure the security of users, property and the environment as well as the continuity of operations. The City is required to implement a set of prevention, protection, response and emergency measures that respond to the risks characterizing each building, in accordance with previously established City policies.

In 2014, the Direction générale of the City adopted the first policy (the Policy) regarding “Municipal building security”. Through this Policy, the City recognizes that it is important to ensure the security of employees, citizens and visitors to its facilities and to protect its critical infrastructure. In fact, the City says this is a strategic issue. The Security Policy therefore applies to all City business units, buildings, and all buildings or parts of buildings leased by the City. The Service de la gestion et de la planification immobilière (SGPI), through its Division de la sécurité, is the business unit mandated by the Direction générale, inter alia, to ensure the development and coordination of the City’s global action plan for implementing this Policy.

Our audit work highlights significant deficiencies. As a result of our findings, we recommended corrective measures to improve security management practices. The following facts were identified:

- Since its adoption in 2014, SGPI has never fully implemented the Policy and the City business units have never enforced it;
- To date, the Direction générale of the City does not have a comprehensive report enabling him to assess the current status of Municipal building security or an action plan to implement the Policy;
- The concept of “*security program*” described in the Policy has never been defined by SGPI in terms of its content and expected standards by building type;
- Several situations highlight the fact that the division of roles and responsibilities of the various Municipal building security stakeholders should be clarified within SGPI;
- According to the information we obtained from the audited business units, only three buildings were the subject of a security study which identified security measures to be implemented in response to the threats and risks to which the buildings are exposed due to their characteristics and typology;

- SGPI is currently unable to monitor the comprehensiveness and compliance of security measures that must characterize each City building because the inventory of existing security measures has not been performed and because the computerized tool for recording existing emergency plans contains incomplete and outdated information;
- No steps have been taken to standardize fire safety clauses in the leases of buildings or parts of buildings leased by the City, and no internal monitoring has been performed to ensure that landlords meet their obligations to ensure the security of the leased buildings;
- There are troubling breaches in controlled locksmithing management that must be addressed promptly by establishing guidelines and a response strategy to identify appropriate mitigation measures;
- Guard service activities should be reassessed to more accurately identify requirements for such responses in buildings and to perform them in accordance with the security standards established by the City;
- As a mandatory, SGPI has not yet identified targets and indicators for assessing and reporting on the performance of security operations in municipal buildings, based on the policies adopted.

We believe it is essential that the municipal administration establish security policies it deems appropriate in order to better define the level of security it intends to propose for municipal buildings.

The City recognizes that security is important, since it has made it a strategic issue. It is now urgent to take concrete steps to mitigate risks in City buildings and demonstrate that the City is fulfilling its responsibilities to ensure user security and the integrity of its facilities.

5. APPENDICES

5.1. OBJECTIVE AND EVALUATION CRITERIA

OBJECTIVE

Ensure that security in City buildings, as well as leased buildings or parts of buildings, is managed in accordance with statutes, regulations, policies and guidelines governing security management to ensure the security and integrity of facilities and users.

EVALUATION CRITERIA

- The division of roles and responsibilities among City security stakeholders is clearly established and fully implemented.
- Security programs are developed, implemented and monitored in accordance with established guidelines.
- Reports on security in designated buildings are issued periodically.

5.2. ROLES AND RESPONSIBILITIES OF CITY STAKEHOLDERS INVOLVED IN MUNICIPAL BUILDING SECURITY

TARGET BUSINESS UNITS	HIERARCHICAL LEVEL	RESPONSIBILITIES ^[A]
Service de la gestion et de la planification immobilière		<ul style="list-style-type: none"> • Distribute, implement and interpret the Policy, and assess its implementation; • Coordinate the City's global action plan to implement the Policy; • Provide business units with advice; • Review action plans and business unit reports; • Prepare an annual report on security management in municipal buildings and buildings or parts of buildings leased by the City; • Provide oversight on Municipal building security management.
	Senior executives and managers	<ul style="list-style-type: none"> • Increase awareness of the Policy on Municipal building security among managers and employees.
All City business units	Top level executives	<ul style="list-style-type: none"> • Identify and assess risks in the unit; • Identify and prioritize security targets in municipal buildings; • Develop and implement an action plan that includes prevention, protection and response measures; • Assess prevention, protection and response measures; • Take corrective action as needed; • Review targets and reporting on an annual basis.
	Property managers ^[B]	<ul style="list-style-type: none"> • Ensure that buildings comply with Policy guidelines and legal and regulatory fire safety standards; • Implement and update security programs in buildings for which they are responsible; • Have the Service de la gestion et de la planification immobilière validate security programs; • Register security programs in the Programme de gestion des mesures d'urgence dans les édifices municipaux. • Distribute information on security programs to people who use the buildings.
	Employees	<ul style="list-style-type: none"> • Become familiar with the Policy, guidelines and security program in the building where they work and the action plan and requirements that apply to them; • Help identify, assess, eliminate and control risks, and look for and implement solutions; • Comply with legal and regulatory standards and guidelines.

^[A] Source: Politique et directive de sécurité dans les édifices municipaux de la Ville – March 2016.

^[B] Official responsible for managing a real estate asset.

