

Item No. 10.2.4 Board of Police Commissioners September 3, 2025

TO: Chair O'Malley and Members of the Board of Police Commissioners

SUBMITTED BY: Original Signed

Cathie O'Toole, Chief Administrative Officer

DATE: August 7, 2025

SUBJECT: Governance Implication of Province of Nova Scotia Police Review

ORIGIN

This is a staff generated report.

RECOMMENDATION

It is recommended that the Commissioner of Public Safety for the Halifax Regional Municipality actively engage with the Nova Scotia Association of Police Governance and the Nova Scotia Department of Justice to share feedback and advance concerns regarding the Nova Scotia Police Review and report back to the Board on progress within 3 months.

BACKGROUND

Following the 2020 mass casualty in Nova Scotia, the Mass Casualty Commission was created to improve public safety. The report entitled *Turning the Tide Together: Final Report of the Mass Casualty Commission*, was released in March 2023 and included 130 recommendations, 75 of which related directly to policing in Nova Scotia and Canada. Recommendation P67 called for a review of the structure of policing in Nova Scotia.

In September 2023, the provincial government launched a province-wide review. In June 2025, the provincial government released the findings of its policing review. The province released both the technical review, produced by Deloitte Canada (Deloitte Report), and the government's response to that review, entitled Shaping the Future: Policing in Nova Scotia (Shaping the Future Report). The government's

response outlines six foundational changes being implemented in response to the policing review:

- Unified Records Management System
- Enhanced Police Resourcing
- Layered Policing Model
- Establishment of Community Safety Boards
- New Provincial Policing Standards
- A New Billing Framework

DISCUSSION

The Department of Justice has committed to meeting with senior officials with the municipality to provide clarity on questions related to the police services review; and have indicated a willingness to engage with municipal Councils and Board of Police Commissioners. Becky Druhan, Minister of Justice and Attorney General for Nova Scotia met with Mayor Andy Fillmore and key provincial and municipal staff at an initial meeting in July.

In August HRM elected officials were invited to a meeting organized by the Nova Scotia Federation of Municipalities with the Minister and key staff to discuss the results of the provincial policing review and next steps. The HRM CAO and Commissioner of Public Safety attended and conveyed that HRM is somewhat unique and there is not enough detailed information available to assess the implications for HRM, therefore the HRM Board of Police Commissioners and Halifax Regional Council have not taken an official position on the review at this time.

In addition to engaging with the Nova Scotia Association of Police Governance and the Nova Scotia Department of Justice the Commissioner of Public Safety will engage with HRM's policing service providers Halifax Regional Police, and RCMP Halifax Regional Detachment on the implications of the Shaping the Future Report.

While each Foundational Change will impact governance to varying degrees, two of the six Foundational Changes outlined in the Shaping the Future Report have direct implications for police governance in Nova Scotia. Specifically, these two Foundational Changes are Layered Policing Model and Establishment of Community Safety Boards. The adoption of layered policing and the establishment of Community Safety Boards raises many questions from a police governance perspective.

Layered Policing

According to the Deloitte Report:

Layered policing integrates sworn police officers with other service providers with differentiated authorities, such as Community Safety Officers, civilianization of administrative roles, etc. Jurisdictions are adopting layered policing to build and maintain relationships with community, provide operational support to community policing initiatives, generate cost efficiencies, and mitigate recruitment and retention challenges faced by sworn officers (p. 14).

And:

Layered policing can be advanced by leveraging related public safety roles, such as Community Safety Officers (CSOs), to attend community events, conduct foot patrols, support police with non-emergency calls for service and integrate with social services to respond to wellness calls. The introduction of layered policing may be a potential solution to address the growing number of non-criminal calls for service, as reported by many police services engaged as part of the Review. CSOs can be unarmed and help deter crime and provide a sense of security to the community, especially in densely populated communities in Nova Scotia, such as those with universities (p. 84).

The Shaping the Future Report describes the Layered Policing Model as the introduction and deployment of Community Safety Officers and Special Constables, which will allow "for more effective responses to a range of public safety needs, while enabling sworn officers to focus on core policing duties" (p. 17). This objective mirror's that of the municipality's Community Crisis Diversion Service pilot, to be launched in Fall 2025. While it would fall outside of the Layered Policing Model, it's unclear how this pilot may fit into the community safety landscape presented by a Layered Policing Model.

Establishment of Community Safety Boards

In the Shaping the Future Report, Community Safety Boards are described as "Providing civilian oversight and governance across the full spectrum of public safety services, including law enforcement, Community Safety Officers, and Special Constables, enhancing transparency, accountability, and community trust (p. 17)." The establishment of Community Safety Boards is not referenced in the Deloitte Report.

While the Ministerial response to NSAPG's letter regarding the Nova Scotia Police Review states that Community Safety Boards "will complement existing boards", the government has not confirmed whether current Boards of Police Commissioners and Police Advisory Boards will be dissolved, reconstituted as Community Safety Boards, or something else. It is worth noting that Ontario's <u>Community Safety and Policing Act</u> mandates the creation of Community Safety and Well-Being Advisory Committees, which are to be consulted in the preparation of Community Safety and Well-Being Plans. While Ontario maintains both Police Service Boards and Community Safety and Well-Being Advisory Committee, the composition of such advisory committees could create a template for the creation of Community Safety Boards (see clause 250[3]).

It's not anticipated that Community Safety Boards would have an oversight role over civilian-led teams, such as Halifax's Community Crisis Diversion pilot. However, there could be a Board role to ensure that the police services cooperate in diverting appropriate calls to the new Community Crisis Diversion service, and that the Board receive call diversion information to ensure that the service is being appropriately utilized.

Community Involvement in Police Oversight

The Deloitte Report states that "[i]t is critical that communities continue to be involved and have oversight of their policing services. A model that enables strong community involvement and enables effective collection and resolution of concerns and issues needs to be developed and implemented" (p. 14).

However, any changes to Nova Scotia's current police model could have significant governance implications. Municipalities that establish a municipal police department are required to provide for a Board of Police Commissioners. The function of police boards is outlined in Section 55 of the *Police Act*:

(1) The function of a board is to provide

- a) civilian governance on behalf of the council in relation to the enforcement of law, the maintenance of law and order and the prevention of crime in the municipality; and
- b) the administrative direction, organization and policy required to maintain an adequate, effective and efficient police department,

but the board shall not exercise jurisdiction relating to

- c) complaints, discipline or personnel conduct except in respect of the chief officer of the municipal police department;
- d) a specific prosecution or investigation; or
- e) the actual day-to-day direction of the police department.
- (2) With the approval of the Minister, the council, by by-law, may prescribe
 - a) the additional or more specific roles and responsibilities of a board; and (b) the rules and regulations governing proceedings of a board, and the board has sole jurisdiction over the matters so delegated to it.
- (3) Without limiting the generality of subsection (1), a board shall
 - a) determine, in consultation with the chief officer, priorities, objectives and goals respecting police services in the community;
 - b) ensure the chief officer establishes programs and strategies to implement the priorities, objectives and goals respecting police services;
 - ensure that community needs and values are reflected in policing priorities, objectives, goals, programs and strategies;
 - d) ensure that police services are delivered in a manner consistent with community values, needs and expectations;
 - e) act as a conduit between the community and the police service providers;
 - f) recommend policies, administrative and organizational direction for the effective management of the police department;
 - g) review with the chief officer information provided by the chief officer respecting complaints and internal discipline;
 - h) ensure a strategic plan and business plan is in place; and
 - i) ensure the department is managed by the chief officer according to best practices and operates effectively and efficiently

Municipalities receiving policing services in whole or in part from the RCMP or the Provincial Police are required to establish a police advisory board. The function of police advisory boards is significantly limited compared to that of Boards of Police Commissioners and is outlined in Section 68 of the *Police Act*:

(1) The function of an advisory board is to provide advice to the council in relation to the enforcement of law, the maintenance of law and order and the prevention of crime in the municipality, but the advisory board shall not exercise jurisdiction relating to complaints, discipline, personnel conduct or the internal management of the Royal Canadian Mounted Police.

It is therefore not clear how any movement toward achieving the Deloitte Report's recommended option of achieving "One provincial policing agency (RCMP or net new) responsible for policing service delivery" (p. 15) would enable greater community involvement in police oversight. In theory, greater oversight over a single provincial policing agency could be partially achieved through amendments to the *Police Act*,

though such amendments are not recommended in the Deloitte Report. Moreover, the ability for local oversight bodies to provide greater oversight over the RCMP, the current Provincial Police in Nova Scotia, and for such oversight to be informed by greater community involvement, will likely always be limited, given that the RCMP is a federal body that receives direction from Ottawa.

Article 6.1 of the Provincial Police Service Agreement (PPSA) states that "The Provincial Minister will set the objectives, priorities and goals of the Provincial Police Service." One way of ensuring greater community and police board involvement in provincial policing would be to formally consult with Police Advisory Boards on provincial police priorities. Such consultation rarely took place in the past, nor have provincial policing priorities been formally shared with Police Advisory Boards.

Other Governance Implications

Streamlined Governance and Oversight

The Deloitte Report recommends amendments to the *Police Act* to achieve a single police board per regional police service and per provincial police district. According to the Deloitte Report, "[t]he current volume of police boards does generally not allow for any individual board to be exposed to trends and to hold the police services to account. By decreasing the total number of police boards the remaining boards will have a broader view and a stronger voice" (p. 60). This recommendation will likely not impact the Halifax BoPC since it already provides representation over a large region. The report also references a lack of diversity on police boards (p.63), which has not been an issue in Halifax in recent years.

Provincial Appointee

Acknowledging the frustration of long-term vacancies on BoPCs and PABs, the Deloitte Report recommends amending the *Police Act* to eliminate the requirement for the appointment of a DoJ provincial appointee on BoPCs and PABs (p. 88). The Deloitte Report also acknowledges that for those who are appointed, there have been minimal to no channels to share priorities with the DoJ (p. 63), as was the original intent of having provincial appointees.

Improved Board Oversight

The Deloitte Report contains several recommendations to enhance board governance. These include developing an onboarding manual for police governance aligned to the new policing model; for the DOJ to work with the Nova Scotia Association of Police Governance (NSAPG) to advise boards on targeted recruitment of key capabilities; and for the consideration of honorariums to advance well-functioning boards. The Deloitte Report also recommends enabling the NSAPG to hire an executive director that has focused capacity to engage with board chairs to collect emerging trends and issues (p. 89).

While Regional Council has already instituted honorariums for non-councillor members, these changes would facilitate enhanced board governance throughout the province, including in Halifax.

Police Transformation Study

After receiving the Police Transformation Study in 2023, the BoPC requested a staff report outlining the necessary steps to achieve an integrated operating model. This work was put on hold pending the release of the Province's Comprehensive Policing Review.

While Deloitte has recommended a provincial police service model, the Government is offering municipalities three choices as a new policing model is being implemented: Municipalities with their own agencies may continue with those agencies if they can meet existing and augmented standards, contract with the provincial police at their own cost to receive services their agency cannot provide, or transition to

the provincial police. Contracting with another municipal police service, which has been permitted in the past, is not presented as an option to meet any current or future standards.

FINANCIAL IMPLICATIONS

There are no immediate financial implications to this report. Any future financial implications arising from implementation of the recommendations will be addressed in staff reports and HRM departmental budgets as required.

COMMUNITY ENGAGEMENT

The Board of Police Commissioners is comprised of four citizen members and three Councillors. Meetings are live webcast on Halifax.ca. The agenda, reports, video, and minutes of the Board are posted on Halifax.ca.

LEGISLATIVE AUTHORITY

Police Act 2004 section 55 states:

- (3) Without limiting the generality of subsection (1), a board shall $\,$
- (c) ensure that community needs and values are reflected in policing priorities, objectives, goals, programs and strategies;
- (d) ensure that police services are delivered in a manner consistent with community values, needs and expectations;
- (e) act as a conduit between the community and the police service providers;

ATTACHMENTS

Attachment 1 – NSAPG Letter to the Minister of Justice July 7.2025

Attachment 2 – Ministerial Response to NSAPG Letter July 25.2025

Attachment 3 – NSAPG Reply to Minister of Justice Aug18.2025

A copy of this report can be obtained online at halifax.ca or by contacting the Office of the Municipal Clerk at 902.490.4210.

Report Prepared by: Joshua Bates, Policing Policy Strategist, Office of the Commissioner of Public Safety, 902-

478-2032

July 7, 2025

The Honourable Becky Druhan Minister of Justice 1690 Hollis Street Halifax, NS B3J 2L6

Dear Minister Druhan,

I am writing on behalf of the Nova Scotia Association of Police Governance (NSAPG), which serves as the collective representative of all police boards across the province. We wish to bring to your attention several matters of ongoing concern related to the recently released Policing Review documents, which we believe have significant implications for public safety, law enforcement operations, and the civilian governance and oversight of police services in Nova Scotia. As President and based on the conclusions of NSAPG's Board meeting held on July 3, 2025, I respectfully submit this correspondence for your consideration and welcome the opportunity to engage further on these important and shared provincial-municipal concerns.

At the outset, we wish to commend the Department of Justice and Deloitte Canada on the scope, depth, and clarity of the "Comprehensive Nova Scotia Policing Review." The Foundational Changes outlined in this report are forward-thinking and present a meaningful opportunity to modernize law enforcement in our province. In particular, the Board solidly supports a unified Records Management System (RMS), which we believe will greatly enhance efficiency and information-sharing across jurisdictions. We also endorse the move to ensure equitable staffing levels across the province. Your current work on strengthening policing standards is a much-needed step toward ensuring that all Nova Scotians receive consistent and adequate public safety services.

Nonetheless, the Board has identified several key concerns that we believe require further review and discussion. Chief among them is the assumption embedded in the report that the RCMP should automatically serve as the provincial police force. While Deloitte's report states that the term "Provincial Police Service" may refer to the RCMP, a newly established provincial service, or both, we are concerned by the Department of Justice's apparent decision to interpret this as an exclusive endorsement of the RCMP. In our view, such a default position is unwarranted and appears inconsistent with the RCMP's documented performance challenges within the province. *Unless and until compelling evidence is presented to justify the RCMP's continued designation as Nova Scotia's provincial police service, we must respectfully but firmly object to this presumption*.

Additional concerns raised by the Board include:

- What are the proposed funding mechanisms for implementing the foundational changes?
- How will the Department address persistent staffing shortages, particularly within RCMP-policed municipalities?
- When will the Department resolve delays in appointing ministerial representatives to municipal police boards, as required under the Nova Scotia Police Act?
- Many municipal police services have established successful regional partnerships for specialized services. What is the rationale for replacing these proven arrangements with new, untested shared service models?

While we will reserve further comments for future correspondence, we must emphasize that the NSAPG--and by extension, the police boards of Nova Scotia which we represent--expects to be meaningfully engaged in the ongoing development and implementation of the recommendations stemming from the policing review. Civilian oversight is a foundational element of accountable policing, and the role of police boards must be maximized in this critical period of reform.

We appreciate your attention to these matters and your continued efforts to advance public safety across Nova Scotia. I would be pleased to discuss any of the points raised above in more detail at your convenience. We remain committed to working collaboratively with the Department to help shape a modern, effective, and community-responsive policing model for our province.

Sincerely,

Virginia Brooke President, Nova Scotia Association of Police Governance

cc: Ms. Haley Crichton, DOJ Ms. Charcy Marchand, DOJ



JustMin@novascotia.ca

July 25, 2025

Via Email:

Ms. Virginia Brooke President Nova Scotia Association of Police Governance

Dear Ms. Brooke.

RE: NSAPG - Initial response to Policing Review Documents

Thank you for your letter dated July 7, 2025, on behalf of the Nova Scotia Association of Police Governance (NSAPG). I appreciate your thoughtful engagement with the Comprehensive Nova Scotia Policing Review and your commitment to strengthening civilian oversight and public safety across our province.

I would like to acknowledge the important role that NSAPG and municipal police boards play in ensuring accountable, community-responsive policing. Your feedback is both timely and valued as we move forward with the implementation of the review's recommendations.

The Comprehensive Policing Review, conducted by Deloitte Canada, represents the most extensive evaluation of policing in Nova Scotia in decades. It was informed by the voices of over 7,000 Nova Scotians and shaped by the findings of the Mass Casualty Commission. The review concluded that our current policing model is fragmented, inconsistent, and not fully equipped to meet the evolving needs of our communities. In response, the Department of Justice has committed to a series of foundational changes that will modernize and strengthen policing across the province.

I appreciate the NSAPG's acknowledgement of the scope, depth, and clarity of the review; your recognition of the meaningful opportunity that the foundational changes present to modernize law enforcement in our province and your support of a unified Records Management System, equitability of staffing levels and the strengthening of police standards. We share the important goals of ensuring that Nova Scotians receive consistent and adequate public safety services.

I would like to take this opportunity to outline in additional detail the six foundational changes to provide further information and address your questions:

- We will implement a single, province-wide Police Records Management System (RMS). This will
 replace the three separate systems currently in use and enable real-time data sharing, improved
 investigative coordination, and more efficient service delivery across jurisdictions.
- We are introducing new Community Safety Personnel to support public safety in non-criminal contexts. These professionals will work alongside police to address issues such as mental health crises, wellness checks, and community outreach, thereby allowing sworn officers to focus on core policing duties.
- We are committed to ensuring appropriate staffing levels across all regions of the province. Further
 direction from the Department of Justice will be provided to address disparities and ensure that
 all communities—urban and rural—receive equitable levels of service. Addressing staffing
 shortages, particularly in RCMP-policed municipalities, is a top priority. We are working closely
 with federal partners and local governments to identify sustainable solutions.
- We will establish Community Safety Boards to enhance localized civilian oversight. These boards
 will complement existing police boards and provide a platform for community input, particularly
 in areas currently lacking formal governance structures. We acknowledge the delays in appointing
 ministerial representatives to the existing municipal Board of Police Commissioners and are
 actively working to resolve these as part of our broader governance reforms.
- We are strengthening provincial policing standards. While new standards were introduced in 2024, we recognize the need for consistent enforcement. Going forward, compliance will be monitored through regular audits and performance evaluations, and agencies that do not meet the standards may be required to contract services or independently invest in the meeting the standards. The rationale for reviewing existing regional partnerships is to ensure consistency, accountability, and alignment with provincial standards. However, we recognize the value of successful local arrangements and will consider them carefully in the transition process.
- We are introducing a revised billing mechanism for municipalities policed by the Royal Canadian Mounted Police (RCMP). This new model will ensure greater transparency and fairness by aligning costs more closely with actual service levels and community needs.

With respect to your concerns regarding the designation of the RCMP as the provincial police service, the review explicitly states that the term "Provincial Police Service" may refer to the RCMP, a newly established provincial service, or both. Deloitte also recommends that Nova Scotia move to expand the RCMP as our provincial police service in advance of making determinations in the future regarding a new provincial police service provider. We are continuing to evaluate all options, and any decision will be based on evidence, performance, and the best interests of Nova Scotians.

Furthermore, I want to assure you that the Department of Justice is working toward detailed implementation of the foundational changes, including the costs associated with these changes, and there remains a significant number of decisions to be made.

We are committed to meaningful engagement with NSAPG and all stakeholders throughout this process. Civilian oversight is a cornerstone of democratic policing, and your continued involvement will be essential as we shape a modern, effective, and community-centered public safety model for Nova Scotia. I understand that you are in regular contact with Charcy Marchand, Director of Public Safety and Policing. I encourage you to remain engaged in these conversations and will ensure you are kept apprised of any further developments.

Thank you again for your leadership and advocacy. I look forward to continued collaboration in the months ahead.

Sincerely,

Original Signed

Becky Druhan
Attorney General and Minister of Justice

cc. Hayley Crichton, Executive Director, Public Safety and Security Division Charcy Marchand, Director, Public Safety and Policing August 18, 2025

The Honourable Becky Druhan Attorney General and Minister of Justice Province of Nova Scotia

Dear Minister Druhan,

Re: Response to July 25 Letter – Policing Review Implementation

Thank you for your detailed correspondence of July 25, 2025, outlining the six foundational changes arising from the Comprehensive Nova Scotia Policing Review. On behalf of the Nova Scotia Association of Police Governance (NSAPG), I wish to express our appreciation for your recognition of our role in advancing civilian oversight and for your commitment to ongoing engagement with our Association.

We value the additional clarity you have provided on the scope and intent of each foundational change. In particular, we appreciate your recognition of the need for equitable service delivery across both urban and rural communities, the importance of robust provincial policing standards, and the critical role of sustained dialogue with the province's Police Boards and Chiefs of Police. We also acknowledge and applaud the recent appointment of a limited number of ministerial representatives and look forward to the timely completion of the remaining appointments.

In the spirit of constructive collaboration, we offer the following observations and requests for continued dialogue:

- 1. Unified Records Management System (RMS) We support this initiative in principle and request early consultation on governance, data access protocols, and municipal cost allocations to ensure a cost-neutral, equitable, and sustainable implementation. Information on anticipated timelines would also be appreciated.
- 2. Community Safety Personnel We encourage the Department to establish clear role definitions, training standards, and reporting structures for these personnel to avoid duplication of effort and ensure seamless integration with existing service providers.
- 3. Equitable Staffing Levels We welcome your commitment to addressing staffing disparities and would appreciate the opportunity to review assessment criteria and timelines when available, particularly in light of persistent vacancies in some regions.
- 4. Community Safety Boards We note the potential for overlap with existing police boards and emphasize the need for clearly defined mandates to prevent governance fragmentation.
- 5. Policing Standards and Audits We support consistent enforcement of standards and request that boards receive timely audit reports to meet their statutory oversight obligations. We note that the audit submission deadline appears to have crept forward from September 1 to August 1, and, given the absence of recent communications from the

Audit Unit to some member boards, we would appreciate confirmation of which municipalities have met the adjusted or extended deadlines.

6. RCMP Billing Mechanism – We look forward to receiving further details on the revised model and its implications for municipal budgets.

With respect to the designation of the RCMP as the provincial police service, we appreciate your assurance that all options remain under consideration. We continue to recommend that any decision be informed by transparent performance metrics, comparative service evaluations, flexibility for special and regional services, and meaningful municipal input prior to any long-term commitments.

We share your objective of ensuring consistent, high-quality public safety services for all Nova Scotians. NSAPG remains committed to working with the Department and our municipal partners to ensure that these reforms strengthen both operational capacity and the principles of civilian governance.

We would welcome the opportunity to participate in a joint working session with Department officials to discuss implementation timelines, municipal impacts, and governance integration.

Thank you again for your engagement and for your recognition of the essential role of civilian oversight in democratic policing. We look forward to continued collaboration as these foundational changes progress.

Yours sincerely,

Virginia Brooke President Nova Scotia Association of Police Governance

cc: Hayley Crichton, Executive Director, Public Safety and Security Division Charcy Marchand, Director, Public Safety and Policing