
Edmonton Police Service Overtime Review

September 9, 2004

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EPS Overtime Review

Introduction

As part of the Edmonton Police Commission's renewed efforts to improve accountability and fiscal effectiveness with the Edmonton Police Service (EPS), the Commission requested that the Office of the City Auditor (OCA) conduct a review of overtime usage within EPS. The EPS Overtime Review was included in the OCA's 2004 Audit Work Plan.

Overtime is a complex issue. Overtime expenditures can be influenced by management controls, scheduling, staffing levels, and organizational objectives, among other factors. Nevertheless, according to the International Association of Chiefs of Police, most excesses and waste associated with police overtime have to do with the failure of police agencies to institute appropriate policy and management controls.

The objective of this review was to examine the EPS's policies and management controls to determine whether or not they facilitate overtime being used in an efficient, effective and economical manner.

Background

At the time of the audit, the EPS was comprised of five organizational areas, as outlined below:

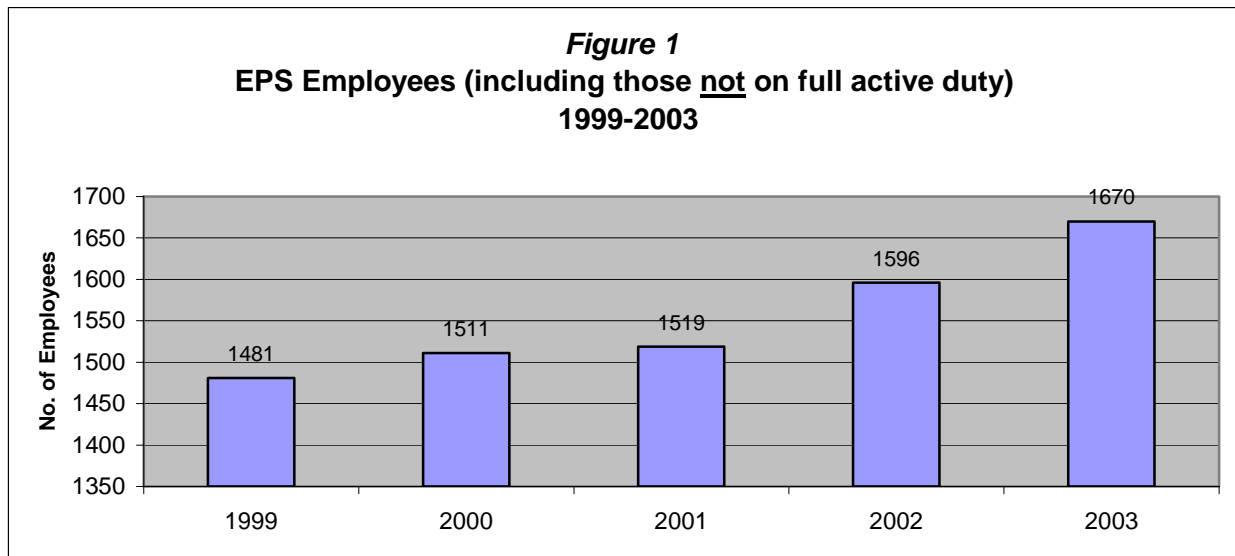
Organizational Unit	2004 Operating Budget (Millions)	2004 Authorized Full Time Equivalents
Patrol Services Bureau	\$90.4	986.5
Investigative Services Bureau	31.3	326.0
Corporate Services Bureau	15.2	117.5
Administrative Services Bureau	35.4	200.5
General Management	2.0	12
<i>Total</i>	<i>\$174.3</i>	<i>1642.5</i>

The **Patrol Services Bureau** consists of four patrol divisions as well as one support services division and comprises approximately 60 percent of EPS personnel. The Patrol Divisions provide primary street-level police services to the community on a 24-hour basis. The Support Services Division is responsible for providing support services to facilitate the operational objectives within the EPS. It is comprised of the Duty Officers and Support Branch, which consists of the Tactical, Traffic, Communications and Canine/Flight Operations Sections.

The **Investigative Services Bureau** consists of two major divisions, the Major Crimes Division and the Special Investigations Division, and comprises 20 percent of the EPS personnel. The Investigative Services Bureau investigates crimes against persons (e.g., homicides, sexual assault, child abuse, robbery, prostitution, and pornography), economic crimes (e.g., counterfeiting and identity theft) and organized crime (e.g., gangs, drugs, auto theft, weapons smuggling and trafficking). The Investigative Services Bureau is responsible, depending on the nature of the investigation, for conducting the initial investigation (thereby precluding the involvement of Patrol Services Bureau personnel) and for conducting follow-up investigations using its subject matter expertise. It also is responsible for support services such as surveillance, forensics, warrants, and court services.

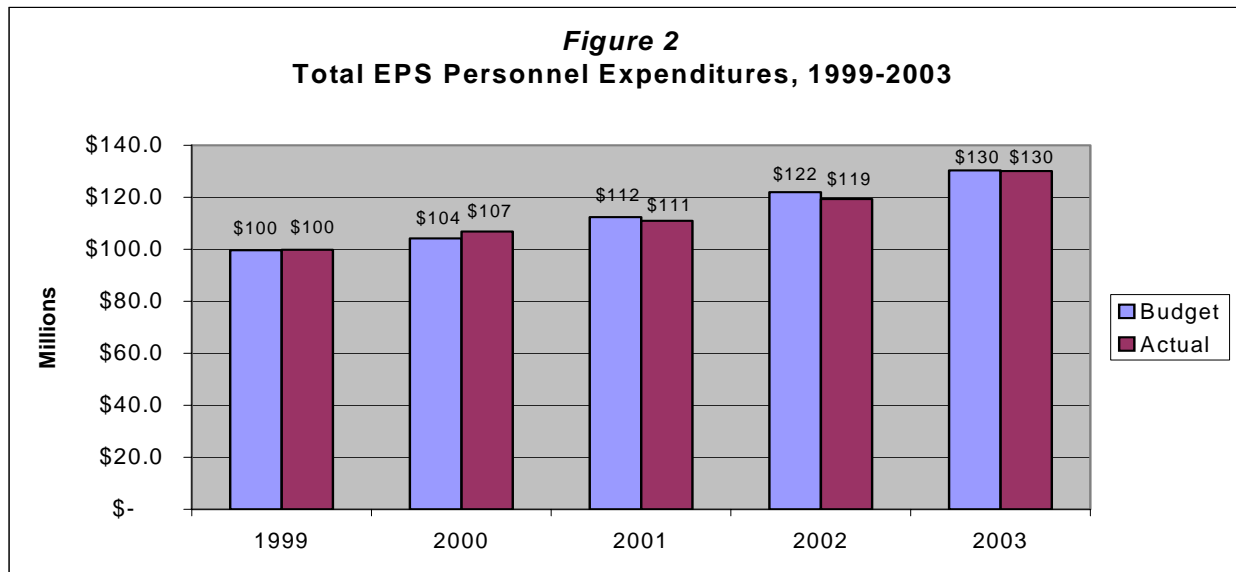
The **Administrative Services and Corporate Services Bureaus** represent 12 and 7 percent of the personnel respectively. These two bureaus provide administrative and technical expertise to the organization. **General Management** includes the Chief of Police, Chaplain, Organizational Health and Employee Wellness and the Edmonton Police Commission and represents less than 1 percent of personnel.

Since 1999, the number of EPS employees increased by 13 percent, from 1481 to 1670 employees (Figure 1), including sworn and non-sworn staff (i.e., civilians), as well as those who are not on full active duty. Employees who are not on full active duty include those who are on leave, recruit training, secondment, loan, long-term disability, workers' compensation, peacekeeping duties, or modified duties. At any one time, this group accounts for approximately 100 to 150 positions. On average, 50 percent of these positions (e.g., maternity leave, secondments, workers' compensation, peacekeeping duties) are funded by external agencies.



Note: The 1999 & 2000 figures have been revised to exclude Bylaw Services, which was transferred to the City in 2001.

Total personnel expenditures (salaries, benefits and overtime) increased by 30 percent between 1999 and 2003, from \$99.8 million to \$130.1 million (Figure 2). Salaries increased by 26 percent and benefits/allowances increased by 40 percent over the same period. Overtime expenditures increased by 126 percent.



Workload

The EPS provides police services for a population of over 685,000 citizens located in the City of Edmonton. It also is impacted by the movement of people coming into the City from outlying communities. This larger area, including Edmonton, is defined as the Edmonton census metropolitan area. In 2003, its total population exceeded 990,000.¹

From 1999 to 2003, the crime rate (Criminal Code offences only) in Edmonton increased by 14.5 percent, from approximately 11,800 to 13,500 per 100,000 population. In 2003, Criminal Code offences and non-Criminal Code offences comprised 25 percent and 75 percent of total offences in Edmonton, respectively.

Criminal Code offences include property crime, violent crime, severe traffic offences, prostitution, gaming and betting, and offensive weapons offences. Criminal Code offences have increased by 23 percent since 1999, from approximately 76,500 to over 94,000 offences. The greatest increase concerned property crime, which rose by 29 percent from approximately 40,000 offences in 1999 to over 51,500 offences in 2003. Violent crime, which includes homicides, attempted murder, robbery and sexual assault, has remained fairly constant over the same 5-year period. Although violent crime comprises less than 10 percent of Edmonton's Criminal Code offences, it consumes a considerably higher proportion of the EPS's personnel resources.

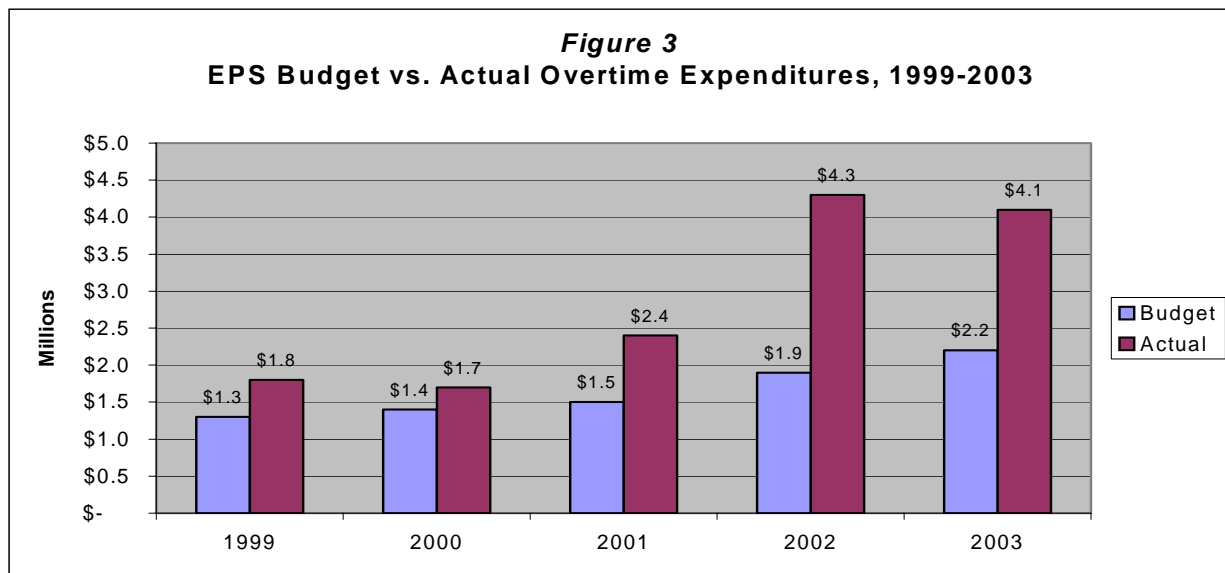
Non-Criminal Code offences include drug charges as well as charges related to other Federal Statutes, Provincial Acts and Municipal Bylaws. Non-criminal code offences have increased by 9 percent from 1999 to 2003, from almost 259,000 to over 282,000 offences.

¹ Statistics Canada

Overtime

Overtime expenditures currently represent 3.1 percent of the EPS's personnel expenditures. Overtime is commonly incurred as a result of shift extensions, call-outs, special operations and plans (e.g., Canada Day, Checkstops), as well as back-filling for vacancies, vacations and illnesses. The EPS tracks court time expenditures separately from its overtime expenditures; therefore, subsequent graphs and figures do not include court-time expenditures.

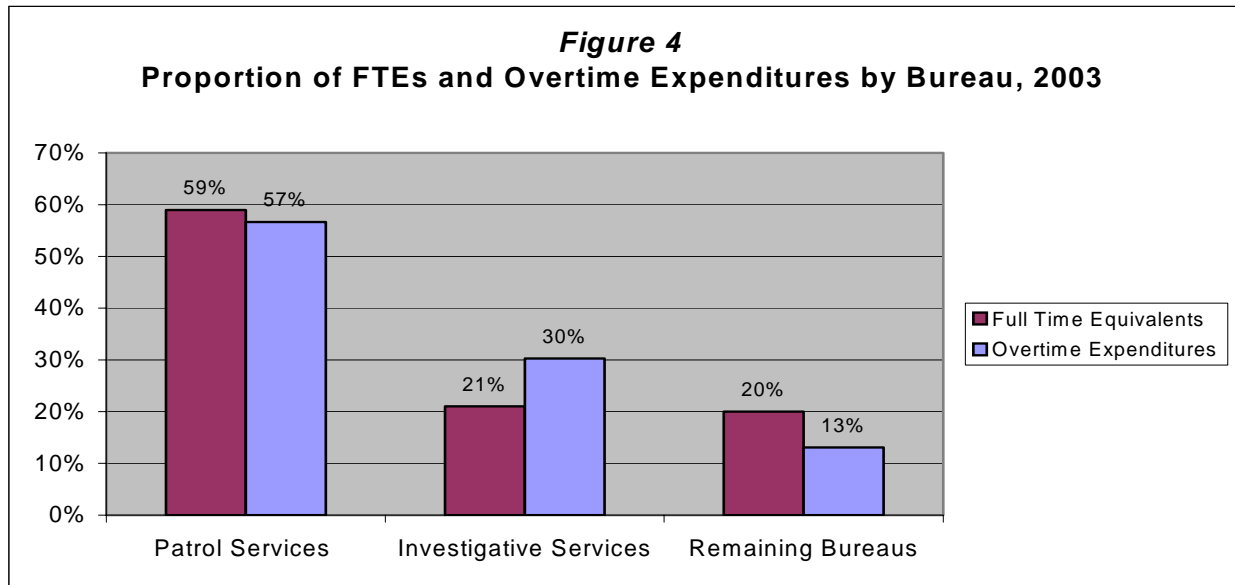
From 1999 to 2003, total EPS overtime expenditures increased by 126 percent, from \$1.8 million to \$4.08 million (Figure 3).



For 2003, the EPS reported that 53 percent of its total overtime costs were due to operational call-outs and investigative requirements, such as responding to violent crimes, gang issues, gun calls and methamphetamine lab calls. Investigations follow a provincial strategy where front-end loading of resources increases the solvability of the crime and accounts for 14 percent of these overtime costs.

Further, the EPS noted that approximately 24 percent of the total 2003 overtime costs resulted from increased workload coupled with staff shortages. The remaining 23 percent of overtime expenditures were attributed to situations such as requiring employees to be on-call, increased recruiting strategies, department training requirements, budget and planning processes and other administrative tasks.

In 2003, the Patrol Services Bureau accounted for 57 percent of overtime expenditures and the Investigative Services Bureau accounted for 30 percent of overtime expenditures. The Corporate Services and Administrative Services Bureaus together accounted for the remaining 13 percent of the overtime expenditures. The distribution of personnel and overtime for the four bureaus is illustrated in Figure 4.



Edmonton Police Association Collective Agreement

Ranks of constable, sergeant, staff sergeant and detective are eligible for overtime compensation under the Edmonton Police Association Collective Agreement (2002). The Collective Agreement stipulates the circumstances and rates of overtime compensation.

According to the Collective Agreement, overtime is incurred when members are required to work hours in excess of the assigned watch. In most instances, such overtime is to be compensated at double-time. There are instances, however, such as work completed on call-out and vacation days, where the Collective Agreement stipulates minimum amounts of compensation.

Members working overtime have the option of being compensated with pay or banked time, as outlined in the Collective Agreement. The banked time is recorded as a payroll expenditure. Members choosing banked time receive twice the hours worked in lieu of pay. Restrictions are in place regarding when members may use their banked time to take time off from their assigned shifts.

Of the members working overtime in 2003, 75 percent chose to be compensated with pay and the remainder chose to be compensated with banked time. Members who choose to be compensated with banked time retain the right to request pay-out of the banked time. Therefore, not all members who bank the time actually take the time off.

Objective & Scope

The OCA's objective was to examine the EPS's policies and management controls to determine whether or not they facilitate overtime being used in an efficient, effective and economical manner.

The scope of the review focussed on the Patrol Services Bureau and the Investigative Services Bureau, which together account for 87 percent of the overtime expenditures in 2003. Band, chorus and honour guard overtime was excluded since it is compensated on an hour-for-hour basis and comprised a very small portion of the overtime expenditures.

The review concentrated on overtime that was incurred as a result of operational decisions, not as a result of members attending court while off-duty. The EPS has experienced a continued reduction in court-time expenditures, with the expectation of further savings resulting from recent initiatives. The exclusion of court time from this review does not preclude it from being reviewed at a future date.

The review did not include statutory holiday premium pay because it does not represent work performed beyond an assigned shift.

Methodology

The EPS assigned a working team to assist the OCA with this review. The working team consisted of representatives from each of the four bureaus: Inspector, Downtown Division (Patrol Services Bureau); Inspector, Crimes Against Persons Branch (Investigative Services Bureau); Payroll Supervisor (Corporate Services Bureau) and Finance Manager (Administrative Services Bureau).

The OCA undertook the following work to satisfy the review's objective:

- Reviewed police overtime audit reports from across Canada and the United States, the International Association of Chiefs of Police's model overtime policy and white paper, and other related documents.
- Examined the historical overtime expenditures by division from 1999 to 2003, the related variance explanations and the adequacy of the budget preparation process.
- Analyzed the 2003 overtime payroll data for patterns of use by rank, organizational unit, individual sworn members, days of week, and time of year.
- Assessed the adequacy of available policies, procedures and information reports.
- Interviewed the following 66 employees from across EPS:
 - Patrol Services and Investigative Services bureaus: Interviewed 21 management level members (Deputy Chiefs, Superintendents and Inspectors) and 26 supervisory level members (Staff Sergeants and Sergeants). The purpose of the interviews was to determine the controls that were in place, the practices followed, and the overtime information available at various levels throughout the organization. The OCA also interviewed 2 constables and 1 detective to obtain additional information.
 - Corporate Services Bureau: Interviewed the Acting Superintendent of the Human Resources Division, the Payroll Supervisor, and the Staff Sergeant in charge of the Training Section. The OCA also interviewed two Inspectors from the Special Projects Branch, the Inspector of the Strategic Community Services Branch, the

Sergeant in charge of the Professional Standards Unit, and the Staff Sergeant in charge of the Internal Affairs Section.

- Administrative Services Bureau: Interviewed the Chief Administrative Officer, the Finance Manager, the Financial Planning Coordinator and the Business Applications Unit Manager.
- Director, Organizational Health and Employee Wellness
- Edmonton Police Association's President and Executive Director
- Edmonton Police Service Senior Officers' Association's President
- Accompanied a constable on a patrol ride-along to gain an understanding of constable duties, the nature of the calls and the impact on overtime utilization.
- Evaluated the appropriate use and compensation of overtime through the review of 670 overtime claims that were submitted in 2003. Of these, 543 overtime claims involved high overtime users and 127 were randomly chosen from members in the Patrol Services and Investigative Services bureaus.
- Reviewed the supporting documentation (e.g., case files, duty sheets, and surveillance reports) for a subset of 132 overtime claims.
- Assessed the EPS's use of planned overtime to augment staffing at West Edmonton Mall and Whyte Avenue on weekends to control drinking-related activity.
- Evaluated banked time transfers between members.

Observations and Analysis

At the time of the OCA review, the EPS already had initiatives underway that could positively impact overtime utilization. These include improved access to employee data by supervisors and management, the development of a health and wellness monitoring system and refinements to the budget preparation process. The EPS welcomed the OCA's involvement and was eager to gain the further benefits that this review would offer.

The OCA's observations regarding whether or not the EPS's current policies and management controls facilitate overtime being used in an efficient, effective and economical manner are detailed below. The complete recommendations, along with the EPS's response and proposed action plans, appear in Appendix A.

Effectiveness

Effective use of overtime achieves the desired results and provides sufficient value to warrant its use. One of the means an organization uses to communicate the desired results of overtime is through an overtime policy.

The OCA evaluated the EPS's current policies and procedures as well as the current management practices to determine if its expectations regarding the use of overtime were clearly communicated and understood. The OCA also assessed the EPS's ability to monitor its members' workload and work/life balance given its operational demands.

Overtime Policy & Procedures

Overtime policies and procedures help guide management in making effective deployment decisions. The EPS provides guidance to its members for certain aspects of overtime through its policy and procedure manual and various divisional policies and procedures. The latter is intended to allow divisions the flexibility to effectively manage overtime use based on the demands in their division.

In its assessment, the OCA determined that the existing policies and procedures are limited in their scope, dealing with only some aspects of overtime utilization. No one document exists that broadly communicates senior management's expectations regarding the use of the overtime and provides an appropriate framework for monitoring, managing and controlling the use of overtime. *[Recommendation 1]*

The International Association of Chiefs of Police has created a model overtime policy that may be of benefit to the EPS as it constructs an overtime policy tailored for its environment.

Overtime Management Practices

The OCA interviewed sergeants, staff sergeants and inspectors within EPS to determine their current practices relating to overtime management. Overtime is discussed at monthly divisional management meetings, which staff sergeants and sergeants can attend. Sergeants and staff sergeants are not evaluated specifically on how well they manage their overtime budgets as part of their formal performance evaluations, but on how they manage their overall budget and the performance of their unit/section.

Sergeants and staff sergeants were asked questions concerning the assessment, authorization, deployment, claim approval, and post-deployment assessment of overtime deployment for their areas. The interviews highlighted inconsistent practices both within and across divisions, such as who should authorize and approve overtime.

The interviews also highlighted that some sergeants and staff sergeants employed best practices to manage their overtime expenditures, such as regularly employing rigorous initial assessments and post-deployment assessments of overtime use. However, the EPS is not benefiting fully from these practices because there is limited opportunity for supervisors, especially at the sergeant level, to share and reinforce these practices more broadly across the organization. As a result, varying degrees of control over resources and expenditures presently exist.

The OCA believes that consistency in overtime management could be enhanced by improved guidance, communication and support at the supervisor level.
[Recommendation 2]

Work/Life Balance

Effective personnel management also needs to consider the work/life balance of its members. In addition to their regular shifts, EPS members work overtime, special duty (where members work overtime that is billed to a third party), and shift replacements as

well as attend court and training while off-duty. Also, some members work voluntary unpaid overtime hours to ensure that their tasks are completed as required.

Not all of this information is captured electronically. Separate reports capture overtime, court and special duty assignments but no data are available electronically concerning the amount of time members dedicate to shift replacements and training on off-duty days, although efforts are underway.

Using the data currently available for 2003 for overtime, special duty assignments, and court attended while off-duty, the OCA noted that in isolated cases members were working in excess of 750 hours² in addition to their regularly assigned shifts. Further, these numbers do not reflect all extra work, such as shift replacements and training attended while off-duty.

Although shift replacements are not considered overtime, they involve members working additional shifts on behalf of other members. Shift replacements have the potential to increase the total number of hours members work per year because there is no obligation for reciprocal shift replacements between members. The member working the shift is compensated with banked time on a 1:1 basis and the member taking the time off has his/her banked time reduced by the same amount.

In areas with high specialized training demands, supervisors reported that when a member's training fell on an off-duty day, they were often unable to provide the member with a day-off within one month's time to compensate (i.e., "time balancing"). One supervisor reported that the squad's staffing needs made it difficult to allow members to take the time-off that was owed in a timely manner. As a result, some members accumulated over 100 hours of time owed for specialized training completed on off-duty days.

The EPS is developing a health and wellness monitoring system that will track the amount of time members spend on overtime, court, special duty and training, along with other health indicators. The intent is to provide information to supervisors on an exception basis when certain criteria reach specified thresholds.

The OCA believes that supervisors require regular access to complete and timely information regarding the amount of time each member is working, including the amount of time dedicated to shift replacements. This additional information will present a clearer picture regarding the number of consecutive days that members are working and the potential impact on members' work/life balance, health and effectiveness.

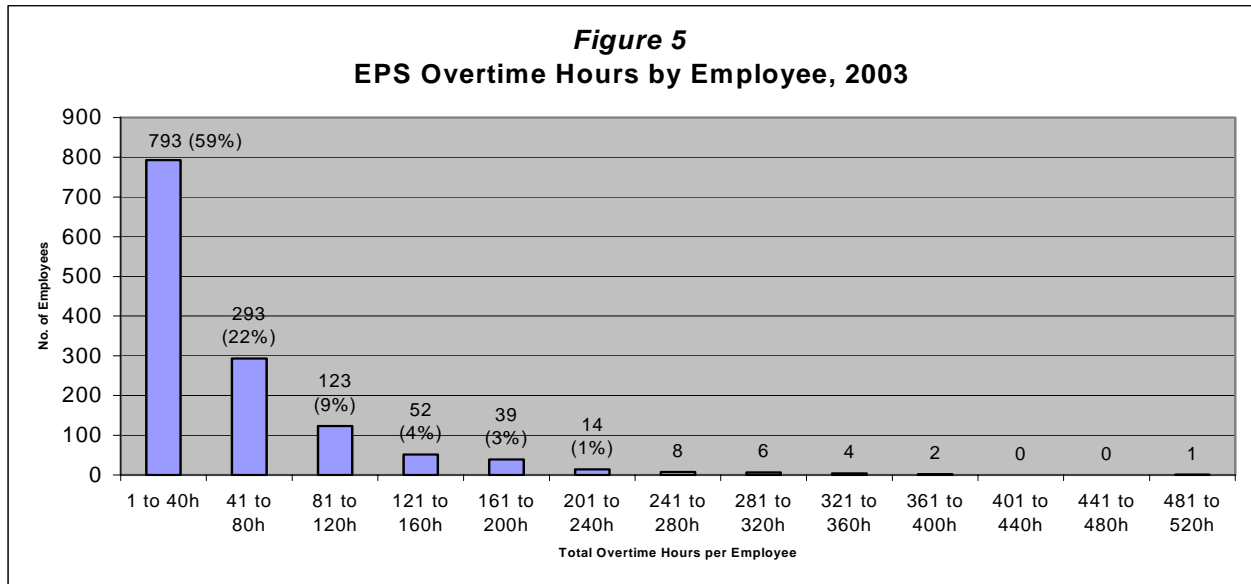
[Recommendation 3]

Efficiency

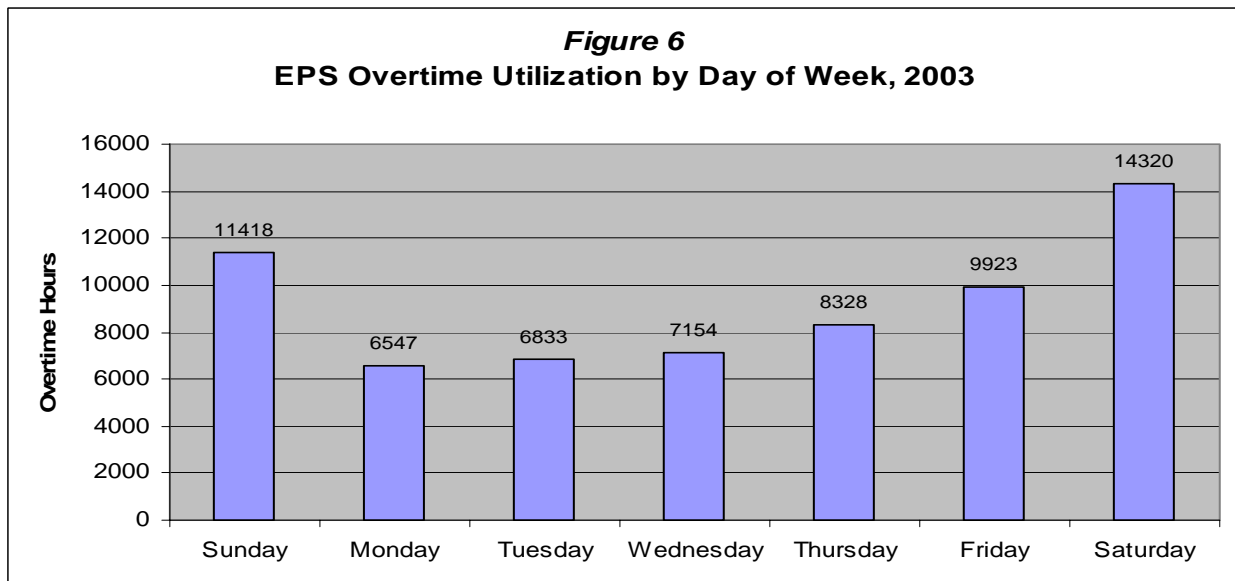
Efficient use of overtime minimizes the number of members deployed on overtime and maximizes their use of core time.

² The OCA could not calculate the exact hours worked because the only source of information was payroll data. The data reflect the number of hours compensated, but not necessarily the number of hours worked. This is because the Edmonton Police Association Collective Agreement (2002) sets a minimum level of compensation for some duties, such as call-outs.

Of those EPS employees working overtime in 2003, 81 percent worked 80 hours or less, 16 percent worked between 81 and 200 hours and approximately 3 percent worked more than 200 hours of overtime.



The OCA also reviewed the overtime hours earned by the day of the week. This analysis indicated that the amount of overtime increased from Monday to Saturday, as is illustrated in Figure 6.



Because overtime represents police work that is performed at premium rates, managers need the ability to determine whether the same work could have been performed at less cost on straight time. Within this context, the OCA evaluated the adequacy of the EPS's management information reports, the impact of the staffing decisions, the degree of compliance to the overtime claims process and the use of overtime for ancillary duties.

Overtime Management Information Reports

Management information reports are a crucial tool in assessing the efficiency and effectiveness of overtime deployment. They allow a police service to know how much of its work is completed on overtime, what type of work it is, and the circumstances of its use (i.e., why overtime was to be paid to particular individuals and units at particular times).

The primary source of information concerning overtime utilization that the EPS provides is the monthly budget reports. These detail the unit's overtime expenditures, budget and variance. Improvements that are being made to the Human Resources Information System (HRIS) will enhance the ability of supervisors to access the number of overtime hours incurred by individual members and units.

An important step in managing and controlling overtime is to gain an understanding of the type of work being performed on overtime. The Finance Section has been working with organizational units to determine whether overtime expenditures were due to minimum staffing needs (e.g., personal leaves, vacation, training), operational needs (e.g., arrests, paperwork, scene investigations), projects (e.g., Canada Day) and "other" (e.g., meetings). At this point in time, the information collected is rolled up into the four major categories and is not readily available at the more detailed level that comprises each category.

Although the OCA supports the EPS's efforts to collect information on overtime utilization, it encourages the EPS to also capture and analyze the data at the subcategory level (e.g., arrests, paperwork, scene investigations). Without knowing the specifics of what is driving overtime use, informed decisions cannot be made regarding how best to control overtime use through alternative member deployment, scheduling, and staffing plans. High level information also limits management's ability to detect potential abuses of overtime by individual members and units.

Therefore, further efforts are required to capture and analyze in greater detail the nature of the work performed and the circumstances of this overtime. *[Recommendation 4]*

Staffing Decisions

Most squads in the Patrol Services Bureau are staffed with eight to ten members. The EPS and the Edmonton Police Association have established the minimum number of members that must be on patrol per squad/watch. Minimum staffing is, in most instances, five to six members per squad. If staffing falls below the prescribed level due to emergent reasons (e.g., illness), sergeants use overtime to bring levels back to minimum staffing.

Sergeants report that their squads are operating at minimum staffing levels between 70 and 80 percent of the time. The OCA's interviews and its review of duty sheets highlighted that a major factor is the number of members on loan or secondment.³ As the EPS takes on additional initiatives, staffing for those initiatives is obtained from a

³ Loans are internal lending of resources with no remuneration for costs; secondments are external lending of resources where wage replacement compensation is provided (e.g., Integrated Response to Organized Crime & Gangs).

variety of operational areas, the primary one being the Patrol Services Bureau. If the loan is less than three months in duration, the member is still counted as part of the originating squad.

Banked time and training demands are two other means by which squad sizes are temporarily reduced. Banked time results from activities previously worked outside their shift, such as overtime, court attendance, statutory holidays, and sanctioned activities such as the pipes and drums band, and allows members to take time off, providing minimum staffing levels are maintained. Training also temporarily reduces squad sizes, but is required for development of the member and the maintenance of certifications. Some specialized units, such as the Tactical Unit, have training demands that consume up to 18 percent of their assigned shifts.

It should be recognized that, even if a member's absence does not bring a squad below minimum staffing levels, the squad is still forgoing the work that would have been completed by that member. The squad size may be insufficient to deal with the volume of work, resulting in shift extensions and therefore overtime. This is supported by the OCA's analysis of the use of banked time that showed that when the use of banked time increased, so did the use of overtime. However, this association needs to be explored further to better understand all of the factors involved.

As squad sizes decrease from the assigned levels, other impacts that may result are diminished service for lower priority calls and less time for proactive policing activities. Small squad sizes also reduce the ability of squads to absorb increases in workload as well as unanticipated leaves. Finally, it creates a situation where sergeants must attempt to balance the obligation to allow members to take time off with the need to adequately staff the squads for the anticipated workload.

Staffing decision challenges are not unique to the Patrol Services Bureau; the Investigative Services Bureau is similarly challenged. It must balance its requirement to provide general investigative services with the dedication of resources required to solve major criminal events, requests for investigative personnel by other divisions or agencies with shared mandates (e.g., RCMP), as well as training demands and court related duties.

The Investigative Services Bureau is responsible for investigating a significant number and variety of complex criminal investigations, frequently for extended periods of time. The need to move personnel to investigative areas as required (internal to the EPS and external to the EPS to agencies with shared mandates) also creates demands on the Investigative Services Bureau's resources. Consequently, the number of Investigative Services Bureau personnel who would normally be available to conduct ongoing or future investigations may be reduced.

Both legislated training and training required to conduct major criminal investigations also occupy a notable amount of Investigative Services Bureau members' time. Over and above the training required to conduct major criminal investigations and crime scene examinations, Investigative Services Bureau personnel must complete all of the mandatory and in-service training, as does Patrol Services Bureau personnel.

Finally, because of court recognized expertise, Investigative Services Bureau personnel are often called to court, potentially for protracted periods of time. Their involvement includes giving expert evidence and helping with the prosecution of the cases through witness preparation and management.

All of the above factors may contribute to the use of overtime. To more effectively and efficiently staff the bureaus, the EPS needs to further explore the impacts of various staffing decisions (e.g., loans, secondments, banked time, and training) and develop a plan to mitigate these impacts over the long-term. *[Recommendation 5]*

Overtime Claim Forms

Another control that can be used to facilitate the efficient use of overtime is an overtime claim form. The EPS uses the C-11 Composite Application Form for overtime claims and has policies and procedures to help ensure that the information reflected on the C-11 forms is complete, accurate and timely. The multiple copy form is to be completed by the submitting member and approved in writing by the supervisor before it is forwarded to the Payroll Section for processing. Copies are retained by the member and the supervisor, with the original maintained by the Payroll Section.

The OCA reviewed 670 C-11s for compliance to these policies and procedures and detected instances of non-compliance to the following policies and procedures:

“All submissions of the Composite Application Form C-11 must be signed by the authorizing supervisor, who shall be senior in rank to the submitting member” (EPS Policy and Procedure Manual, Part 11, Chapter D, Section 11 (B)).

For 96 (14 percent) of the C-11 forms reviewed, the approving member was of equivalent rank, rather than at least one rank higher.

The OCA also noted that an additional 86 (13 percent) of the C-11 forms reviewed did not include the approving member's rank. The OCA confirmed that these members had the authority to sign the C-11 form. However, the Payroll Section should not process the claim without knowledge of the approving member's rank.

“All members of the police service ending a period of authorized overtime will promptly complete the appropriate sections of Form C11” (EPS Policy and Procedure Manual, Part 7, Chapter C, Section 1 (A)).

For 42 (6 percent) of the C-11 forms reviewed, the dates on the C-11 forms indicated that members submitted the forms to their supervisors more than one week, and up to 11 weeks, after the overtime was completed. Given in most instances the supervisors are not present when their members work overtime, it becomes more difficult for the supervisor to recall/obtain the circumstances for the overtime claim as time passes.

“The supervisor will forward the original of the approved form to [Payroll] Section” (Procedure outlined on the reverse of the C-11 form).

According to the Payroll Section, it is common practice for supervisors to allow members to submit their C-11 forms directly to the Payroll Section once the supervisor approves the claim.

Allowing this practice creates an environment where unauthorized amendments to the overtime claim can occur. To ensure that no unauthorized changes had occurred on four C-11 forms where the hours had been amended in the sample reviewed, the OCA compared the Payroll Section's copy of the C-11 with the supervisor's copy. In all instances, the changes made were legitimate.

The OCA also detected a similar control weakness when the Payroll Section returned incomplete or vague C-11 forms directly to the member claiming the overtime. Once again, this provides an opportunity for unauthorized changes to the C-11 form. To protect against unauthorized changes, the OCA believes that the flow of C-11s should always be between the supervisor and the Payroll Section. This control also provides supervisors with necessary feedback regarding problems with the overtime claims. The Payroll Section has since amended its practice and now returns C-11 forms directly to the supervisor.

The receipt by the Payroll Section of incomplete, vague or improper claims occurs frequently enough to negatively impact the Payroll Section's productivity. Prior to the OCA's review, the Payroll Section returned an average of 70 C-11 forms per pay period to members for their completion or revision. With the requirement for greater compliance to policy and procedure, the OCA anticipates that the number of returned forms will increase over the short term. Over the long term, however, the OCA believes that the number of forms returned to supervisors would decrease if the EPS provided supervisors with clear direction regarding what elements of the C-11 form require their review prior to providing their signed approval.

The OCA believes there is significant potential to improve controls surrounding the overtime claim process. This can be accomplished through clearly outlining what the supervisors must review prior to providing approval, changing how the C-11 forms flow to and from the Payroll Section, and clearly outlining what Payroll staff members must review prior to processing the overtime claims. *[Recommendations 6 a-e]*

The OCA also evaluated the degree to which the Payroll Section was able to properly apply the various clauses of the Collective Agreement to the C-11 overtime claims reviewed. Of the 670 C-11s reviewed, the majority was appropriately compensated. A minimal number of claims (10 claims, 1.5 percent of the sample) were not appropriately compensated, three of which involved minor calculation errors. The remainder resulted from misapplication of the Collective Agreement clauses for call-outs preceding shifts, call-outs during vacation, and work performed on off-duty days. The result was over-/under-compensation errors ranging from 0.5 hours to 5 hours of double-time. Once advised, the Payroll Section promptly corrected the compensation errors.

In the OCA's review of the Collective Agreement, it determined that the agreement did not provide direction regarding from what point call-outs are to be compensated, i.e., from the time of the call-out or from the member's arrival on-scene. To ensure consistency in the application of the clauses, this omission should be remedied.

[Recommendation 6f]

Validation of Overtime Claims

Of the 670 overtime claims that were reviewed for compliance, the OCA chose a subset of 132 claims to review additional support documentation. Specifically, the OCA was seeking evidence that (a) the work performed was completed on overtime and (b) the number of hours claimed was accurate. The supporting documentation available consisted of arrest reports, investigator case notes, interview monitor notes, surveillance reports, homicide reports, duty sheets, meeting minutes and other documents as necessary.

One hundred and five claims (80 percent) of the claims reviewed involved members who claimed more than 200 hours of overtime in 2003. The OCA's review of the supporting documentation for the high earners' claims indicated the following:

- For 44 (42 percent) of the C-11 claims reviewed, there was sufficient information available to substantiate the claims regarding both the work done and the time claimed.
- For 34 (32 percent) of the claims reviewed, there was sufficient detail to confirm that the member completed the work claimed. However, there was insufficient detail available to make a determination of whether or not the work was completed in the number of hours claimed.
- For the remaining 27 (26 percent) of claims reviewed, written support was very limited or did not exist. These claims involved members of the Criminal Investigation sections. The OCA followed up on these claims with the members' staff sergeants. The staff sergeants stated that, due to the nature of the work completed (e.g., surveillance), it was not common practice to document the work beyond what was provided on the C-11 form.

In contrast, the results of the OCA's assessment of the supporting documentation for the remaining 27 claims that were submitted in 2003 by those who claimed less than 200 overtime hours indicated the following:

- For 23 (85 percent) of the C-11 claims reviewed, there was sufficient information available to substantiate the claims regarding both the work done and the time claimed.
- For 4 (15 percent) of the claims reviewed, there was sufficient detail to confirm that the member completed the work claimed. However, there was insufficient detail available to make a determination of whether or not the work was completed in the number of hours claimed.

It is important to ensure that an adequate audit trail exists to support overtime expenditures. This allows management the opportunity to review the validity of overtime claims and make strategic decisions regarding the use of overtime. The OCA recommends that the EPS reinforces the need to maintain adequate supporting documentation where feasible. Where this is not feasible, the C-11 overtime claims must include sufficient detail to serve as an adequate record of the overtime worked.

The OCA also recommends that management performs regular audits of overtime claims to ensure their validity. [*Recommendation 7*]

Ancillary Overtime

EPS policy 11-A-16 guides the compensation of “work extra to regular duties” (e.g., community meetings, presentations, and assistance to other organizational areas) and requires that overtime be used as a last resort. Members are first to attempt to schedule the work during regular hours, adjust their shift or reschedule their shift (also known as “time balancing”).

Based on the review of a sample of C-11 overtime claims, the OCA concluded that there is a reasonable amount of compliance to Policy 11-A-16. The OCA’s interviews with supervisors confirmed that rescheduling members’ shifts appears to be the most common way of compensating members for work that is done outside their regular shift.

In isolated instances, there were members who had significant amounts of overtime related to ancillary duties. For example, in 2003 one member had 201 hours of ancillary overtime that resulted from attending tradeshow, meetings, and educational programs on evenings and weekends. The OCA recommends that the EPS monitors the application of EPS policy and procedure 11-A-16 to ensure that the amount of overtime for ancillary duties is kept to a minimum. [*Recommendation 8*]

Economy

Economical use of overtime limits expenditures where possible. This does not preclude the use of overtime to staff sporadic personnel demands such as emergencies; to be able to meet such demands without using overtime would suggest over-staffing.

The OCA evaluated the budget preparation process, the use of planned overtime and the impacts of the time transfer process.

Budget Preparation

Although some overtime expenditures cannot be predicted, repeated surprises can indicate a lack of analysis. Due to the extreme variance between the EPS’s budgeted and actual overtime expenditures as illustrated earlier in Figure 3, the OCA’s overtime review included an assessment of the adequacy of the EPS’s overtime budget preparation process.

Interviews with supervisors and management showed that, in 2002 and 2003, the EPS experienced changes in its environment and practices that could be expected to increase its overtime expenditures. This includes, but is not limited to, the following:

- The abolishment of the practice of unrecorded overtime known as “black book” time, where members took time-in-lieu for extra hours worked. This is different than banked time because black book time was not recorded as a liability on the payroll system.
- The inception of the major case management model which is used to solve major crimes such as homicides. The philosophy behind major case management is that deploying substantial personnel within the first 72 hours of a serious crime increases the probability of identifying and charging an offender.

- The formalization of minimum staffing, where members can be brought in on overtime if the staffing level falls below the established minimum due to emergent reasons.
- Changes to legislation that require additional warrants before an EPS member can enter a premise to arrest a person on an outstanding warrant.
- The redeployment of members from other areas of the Service to Patrol divisions as a result of the Core Services Review. The purpose of the Core Services Review was to redeploy members from other areas of EPS to core service areas such as patrol.
- The challenges faced filling recruit positions and vacancies.

The OCA concluded that, although each operational area detailed the impact of anticipated changes in its overtime budget requests, the resulting approved overtime budgets did not reflect this information. Instead, the EPS's practice was to increase each unit's overtime budget from the prior year by an inflationary increase to reflect labour agreement changes. This was done with the awareness that the total personnel budget was sufficient to cover-off the budgetary needs for overtime (see page 3, Figure 2). Any overtime expenditures beyond the approved budget were to be absorbed by the total personnel budget through unspent monies from vacancies that could not be filled.

This budgeting process decreases the ability of the EPS to effectively manage overtime expenditures. Variance explanations become less meaningful against an artificial budget and the need for mitigating strategies is subsequently less apparent. This environment also precludes the use of a further control, the requirement for formal authorization for spending overtime dollars beyond what was budgeted.

The OCA acknowledges that the EPS has taken steps to improve the overtime budget process for 2005; however, further steps need to be taken to strengthen the framework for developing the annual overtime budget. The OCA recommends that the EPS enhances its overtime budget process to more accurately predict annual budget overtime hours and dollar expenditures for each unit. *[Recommendation 9]*

Planned Overtime

The OCA reviewed the EPS's use of overtime to supplement West Edmonton Mall and Whyte Avenue beat staffing during peak activity periods on weekends.

In 2003, the EPS spent \$47,000 on planned West Edmonton Mall beat overtime. The beat overtime consisted of 2 additional members working 3-hour overtime shifts, from 12:30am to 3:30am, on Friday and Saturdays nights. The additional members are used to help maintain control of an area of West Edmonton Mall known as "Entertainment Alley," which has 4 major licensed establishments and 6500 licensed seats. West Edmonton Mall as a whole has approximately 8500 licensed seats.

Also in 2003, the EPS spent approximately \$119,000 on planned Whyte Avenue beat overtime. The beat overtime spans May to September, consisting of 6 additional members working 5-hour shifts, from 11:00pm to 4:00am, on Friday, Saturday and Sunday nights. The additional members are used to help maintain control along Whyte Avenue's 68 licensed establishments, which have over 5000 licensed seats.

The number of shifts required to maintain control of these two areas is based on historical information and is evaluated regularly. The OCA conducted interviews with West Edmonton Mall Security and the Old Strathcona Business Association to determine the perceived effectiveness of the planned beat overtime. Both parties reported that the additional officers were useful in controlling the activity in both locales and neither party believed that the number of officers was excessive.

The staffing of these beats poses a challenge to the EPS because of the weekend call load and member availability. Without the use of planned overtime to increase the staffing complement for these specific beats, the EPS stated that other areas of the City would experience further call backlogs as members on patrol were called to West Edmonton Mall or Whyte Avenue to address calls.

The OCA concluded that the EPS is using the overtime resource effectively and efficiently for planned beat overtime, but the use of overtime to staff these initiatives should be re-evaluated annually. The annual review should explore alternatives to the use of overtime, to include the viability of using special event policing and/or redeploying resources from across the organization to minimize overtime use.

[Recommendation 10]

Time Transfers

The OCA also examined the ability of members to transfer banked time amongst each other. This is referred to as a “Time Transfer” and is addressed in the EPA Collective Agreement. The EPS does not currently have a policy and procedure that captures the time transfer process.

The Collective Agreement states that a member shall be permitted to transfer accumulated overtime hours to another member’s account provided that the receiving member’s overtime account does not exceed three hundred and twenty (320) hours. Since this agreement only covers members who are part of the Edmonton Police Association, only these members can transfer hours amongst each other.

The Collective Agreement does not require that the hours transferred from one member to another be pro-rated based on the receiving member’s current rate of pay or that they be to a member of equivalent rank. However, given it is the hours that are transferred, not the dollar value, the hourly rate may not be the same.

The OCA examined the 33 transfers that were made in 2003. Nine time transfers were made to members earning higher rates of pay. These transfers increased the banked time liability by approximately \$2,344. The net impact on the banked liability was small, given transfers to members receiving lower rates of pay decreased the liability by an almost equivalent amount (\$2,238).

Of the 33 transfers, 14 transfers were between members of differing rank (e.g., from a constable to a staff sergeant or vice versa). For 5 of the 14 transfers, members received transfers of 100 hours each. The OCA is concerned that transfers between members of differing ranks could create the potential for inappropriate influence.

The OCA recommends that the EPS develops a policy and procedure for time transfers and considers seeking clarity in the next collective agreement regarding time transfers to members of differing rank/pay. *[Recommendation 11]*

Conclusion

Overtime management is a complex issue. It is influenced by many factors, including management controls, scheduling, staffing levels, and organizational objectives. According to the International Association of Chiefs of Police, however, most excesses and waste associated with police overtime have to do with the failure of police agencies to institute appropriate policy and management controls.

The objective of this review was to examine the EPS's overtime policies and management controls to determine if they facilitated overtime being used in an efficient, effective and economical manner. Without adequate policies and management controls, unplanned overtime expenditures can create budget overruns and divert resources from key operational areas.

The OCA believes that there is the desire within EPS to balance the obligation to provide quality service to the citizens of Edmonton with the obligation to minimize overtime expenditures. This review highlighted that the EPS can do more to create a stronger control environment through providing more guidance in its policies and procedures (effectiveness), capturing and analyzing more detailed information on overtime utilization (efficiency) and improving its monitoring of overtime utilization and expenditures (economy).

The advantages of overtime can only be realized if overtime is used appropriately and managed carefully. Because overtime represents police work that is performed at premium rates, managers need the ability to determine whether the same work could have been performed at less cost on straight time. The creation of a comprehensive overtime policy will facilitate consistent practices by detailing in what instances the use of overtime would be appropriate and who has the authority to make such decisions.

The information available regarding the EPS's overtime utilization is basic, but evolving. Better information regarding for what purpose and under what circumstances overtime is used will allow the EPS to make informed decisions about how best to control overtime use through alternative member deployment, scheduling, and staffing plans. Improvements to data collection and analysis will also improve management's ability to detect potential abuses of overtime by individual members and units.

Better information will then facilitate improved monitoring. By increasing the accuracy of overtime budgets, the review of budget variances and variance explanations will be a more effective control. Accountability will also be heightened through regular audits of compliance to the existing controls that surround the overtime claims process. Finally, regular assessment of the expenditures related to planned overtime will determine if there are alternative ways in which to staff these initiatives.

Overtime expenditures cannot be eliminated altogether, regardless of the number of members employed, because of inevitable shift extensions, unpredictable events and contract requirements. Overtime should be viewed, within limits, as an unavoidable but manageable cost of policing. However, the OCA believes that once the EPS improves its policies, information and monitoring, the EPS will be in a much better position to satisfy itself and others that it is using this resource efficiently, effectively and economically.

The OCA is grateful for the cooperation and assistance that it received from all EPS personnel. It extends particular thanks to the members of the EPS Overtime Working Committee.

Appendix A: Recommendations, Responses and Action Plans

Recommendation # 1	EPS Response and Action Plan
<p style="text-align: center;">Overtime Policy</p> <p>The OCA recommends that the EPS:</p> <ul style="list-style-type: none"> a) Develops an overarching policy that clearly describes management's expectations regarding the use of overtime and provides an appropriate framework for monitoring, managing and controlling the use of overtime. b) Considers using the International Association of Chiefs of Police model overtime policy as a guide in developing its own policy. 	<p><i>Response:</i> Recommendation Accepted.</p> <p><i>Action Plan:</i> Management to development a comprehensive overtime policy modelled after or drawing upon concepts found in the International Association of Chiefs of Police Overtime Policy. This policy will be developed in consultation with EPS Executive Officers Team.</p> <p><i>Area Responsible:</i> Human Resources (HR) Division & Professional Standards Unit.</p> <p><i>Target Date for Completion:</i> 2005 June 30.</p>
Recommendation # 2	EPS Response and Action Plan
<p style="text-align: center;">Overtime Management Practices</p> <p>The OCA recommends that EPS management provides clear direction and support to supervisors regarding overtime management (assessment, authorization, deployment, approval and post-deployment assessment as applicable) to facilitate consistent practices throughout the organization.</p>	<p><i>Response:</i> Recommendation Accepted.</p> <p><i>Action Plan:</i> In conjunction with the development of the overtime policy (Recommendation #1), develop a procedure outlining the protocols for authorization and approval of overtime. The overtime policy and procedure will be included in the EPS policy & procedure manual. This information will also be submitted for inclusion as part of the EPS Supervisor's course.</p> <p><i>Area Responsible:</i> Executive Services Division – Professional Standards Unit.</p> <p><i>Target Date for Completion:</i> 2005 June 30.</p>
Recommendation # 3	EPS Response and Action Plan
<p style="text-align: center;">Work/Life Balance</p> <p>The OCA recommends that the EPS:</p> <ul style="list-style-type: none"> a) Tracks and monitors the time members dedicate to all major duties that are in addition to their regular shifts (e.g., overtime, special duty, court, shift replacement, training) and provides this information to supervisors on a regular basis. b) Updates its policy and procedure manual to include guidance on the use of time balance. 	<p><i>Response:</i> Recommendation Accepted.</p> <p><i>Action Plan:</i></p> <ul style="list-style-type: none"> a) A system will be developed for tracking and monitoring time spent on duties outside of EPS member's regular shift. b) The EPS overtime policy and procedure will incorporate guidance on the use of time balance (refer to Recommendation #2). <p><i>Area Responsible:</i> Human Resources Division lead, in consultation with Project Aristotle and Finance and Supply Services.</p> <p><i>Target Date for Completion:</i> 2005 December 31</p>

Recommendation # 4	EPS Response and Action Plan
<p style="text-align: center;">Management Information Reports</p> <p>The OCA recommends that the EPS:</p> <ul style="list-style-type: none"> a) Takes further steps to capture and analyze in greater detail the nature of the work performed on overtime and the circumstances of its use. b) Works with the Project Aristotle Team to determine if the new PeopleSoft modules will be able to address some of the overtime reporting requirements. 	<p><i>Response:</i> Recommendation Accepted.</p> <p><i>Action Plan:</i></p> <ul style="list-style-type: none"> a) Chief’s Committee and EOT will be surveyed to determine what information is required to compile meaningful Management Information Reports. b) In order to develop the required management information reports for overtime, a review of existing or new sources of data (i.e. Project Aristotle and People Soft) will be carried out to determine the necessary modifications of the C-11 report to capture the required information. The completion of the management reports cannot be completed until after the re-design of the C-11 (see recommendation # 6). <p><i>Area Responsible:</i> Human Resources Division (Payroll Section) will take the lead on this issue with Finance & Supply Services and Project Aristotle providing support as required.</p> <p><i>Target Date for Completion:</i> 2005 December 31.</p> <p><i>Note:</i> As a constraint, The City of Edmonton payroll system cannot be modified until spring 2005 as it is currently undergoing a systems upgrade. The completion of this upgrade is a target which may require the timeline on this item to be modified.</p>
Recommendation # 5	EPS Response and Action Plan
<p style="text-align: center;">Staffing Decisions</p> <p>The OCA recommends that the EPS further explores the impact of staffing decisions (e.g., loans, secondments, banked time, and training) and develops plans to mitigate these impacts over the long-term.</p>	<p><i>Response:</i> Recommendation Accepted.</p> <p><i>Action Plan:</i> That as part of the EPS organizational review currently underway, EPS review and establish the core services that should be provided in the future. Consideration will need to be given to existing resource levels and future resource requirements to achieve the service delivery model.</p> <p><i>Area Responsible:</i> Chief’s Committee.</p> <p><i>Target Date for Completion:</i> 2005 December 31.</p>

Recommendation # 6	EPS Response and Action Plan
<p style="text-align: center;">Overtime Claim Forms</p> <p>The OCA recommends that:</p> <ul style="list-style-type: none"> a) EPS management clearly communicates the key areas on the C-11 requiring the supervisor’s review prior to providing approval. b) EPS management reminds supervisors that they, not the members, are to submit the approved C-11 form directly to the Payroll Section (per the directions provided on the C-11). c) EPS management requires that all C-11 forms be prepared and submitted to the approving supervisor within 5 days of the overtime worked. Claims submitted later than this period of time should require the division commander’s consent. d) The Payroll Section creates a checklist to ensure that key elements of the C-11 form are reviewed prior to processing. e) The Payroll Section must return C-11s to the member’s supervisor, not to the member, in the event that further explanation or revision is required. f) The EPS considers including the “Call-out process” as an agenda item during the next negotiation of the Collective Agreement. The purpose would be to provide clarity in the Collective Agreement regarding from what point in time call-outs should be compensated. 	<p><i>Response:</i> Recommendation Accepted.</p> <p><i>Action Plan:</i> The majority of this recommendation can be accomplished in a short period of time as most items identified in sections “a-e” have already been addressed by the Payroll Section. There are four main areas to address in this recommendation and they are:</p> <ul style="list-style-type: none"> 1) The re-design of the C-11 form to incorporate all the information categories identified as necessary for the preparation of management information reports and for ongoing audit programs. 2) The establishment of an appropriate coding system for the above form and the implementation of these codes into the payroll information system. 3) The inclusion of the process for completion of the C-11, including responsibilities of employee and supervisor, in the overtime policy and procedure (refer to Recommendation #2). 4) The consideration as to whether the call-out process (item f) will be addressed will be made by the EPS Bargaining Committee based on its determination as to the significance of this issue in the Collective Bargaining Process. As this issue is included in the Collective Agreement it cannot be addressed until the next collective bargaining process is initiated. <p><i>Area Responsible:</i> Human Resources Division - Payroll Section</p> <p><i>Target Date for Completion (parts 1-3):</i> 2005 June 30.</p> <p>Note 1: Payroll Section has already implemented checks to address recommendations a – e. C-11’s are scrutinized to ensure compliance with completion and approval requirements and submissions found to be in error are returned through the Divisional Inspector.</p> <p>Note 2: Delays may occur as a result of delays in EPS’s ability to implement newly developed codes within the payroll information system.</p>

Recommendation # 7	EPS Response and Action Plan
<p style="text-align: center;">Validation of Overtime Claims</p> <p>The OCA recommends that:</p> <ul style="list-style-type: none"> a) EPS management reinforces the need to maintain adequate supporting documentation, where feasible, for overtime claims. Where it is not feasible to maintain supporting documentation, EPS management will require that the C-11 forms include sufficient detail to serve as an adequate record of the overtime worked. b) EPS management performs regular audits of overtime claims to ensure their validity. The audits should involve the following: <ul style="list-style-type: none"> (i) Monthly spot audits by section/division heads. (ii) Annual audits by the Payroll Section. 	<p><i>Response:</i> Recommendation Accepted.</p> <p><i>Action Plan:</i> EPS will address recommendations on improved support information for overtime and spot checks and audits as part of the policy and procedure development (refer to Recommendations #1 and #2).</p> <p><i>Area Responsible:</i> Human Resources Division.</p> <p><i>Target Date for Completion:</i> 2005 June 30.</p>
Recommendation # 8	EPS Response and Action Plan
<p style="text-align: center;">Ancillary Overtime</p> <p>The OCA recommends that the EPS monitors the application of EPS policy and procedure 11-A-16 to ensure that the amount of overtime hours for ancillary duties is kept to a minimum.</p>	<p><i>Response:</i> Recommendation Accepted.</p> <p><i>Action Plan:</i> This recommendation is supported through the action plan identified under Recommendation #3. Through the development of a system for tracking and monitoring time spent on duties outside of EPS member’s regular shift, EPS will be able manage the level of overtime required for this purpose. As part of the development of the overtime policy and procedure (Recommendations #1 & 2), direction should be provided on the duties of the supervisor to monitor upcoming duties and assignments of staff to minimize overtime arising from ancillary duties.</p> <p><i>Area Responsible:</i> Human Resources Division.</p> <p><i>Target Date for Completion:</i> 2005 June 30.</p>

<p align="center">Recommendation # 9</p>	<p align="center">EPS Response and Action Plan</p>
<p align="center">Budget Preparation</p> <p>The OCA recommends that the annual overtime budget process be enhanced to more accurately determine annual budget overtime hours and dollar expenditures for each unit within EPS as noted below:</p> <ul style="list-style-type: none"> a) Specifically each operational unit within EPS should include in its budget submission the following information (using appropriate management information reports): <ul style="list-style-type: none"> (i) Estimated total number of Members that will incur overtime hours during the year. (ii) Estimated average number of overtime hours per Member per year. (iii) Extended dollar amount of the total overtime expenditure. (iv) An explanation of the estimated overtime expenditure (including the potential for unforeseen events such as riots, visiting dignitaries, weather-related events, etc.). b) Budget instructions should be enhanced to require that every level (from the Staff Sergeant level up the Chief) have specific responsibilities to ensure the overtime budget amount is accurately estimated on a best effort basis and complete prior to final approval. 	<p><i>Response:</i> Recommendation Accepted.</p> <p><i>Action Plan:</i></p> <ul style="list-style-type: none"> a) That the budget instructions and forms for 2006 budget process be revised to capture overtime information as recommended. b) That the budget instructions and orientation meetings include appropriate levels of staff to ensure and promote better estimation of overtime. In addition, Finance & Supply Services will assist Divisional Commanders to more accurately predict overtime. <p><i>Area Responsible:</i> Finance & Supply Services – Finance Section.</p> <p><i>Target Date for Completion:</i> 2005 March 31.</p>
<p align="center">Recommendation # 10</p>	<p align="center">EPS Response and Action Plan</p>
<p align="center">Planned Overtime</p> <p>The OCA recommends that:</p> <ul style="list-style-type: none"> a) The EPS management requires that any initiative that will entail the use of planned overtime be evaluated annually regarding its cost-effectiveness. b) The evaluation should include a review of alternatives to the use of planned overtime, to include the viability of using special event policing and/or redeploying resources from across the organization to minimize overtime use. 	<p><i>Response:</i> Recommendation Accepted.</p> <p><i>Action Plan:</i> A Service Directive will be created directing that any proposed Planned Overtime Project will be formally documented for approval and will contain an evaluation component as to the effectiveness of the program. The evaluation should also examine the cost-effectiveness of the program. This evaluation strategy will be performed at the conclusion of each event (e.g. Canada Day), or in the case of ongoing projects (e.g. Whyte Ave. beats), at least annually.</p> <p><i>Area Responsible:</i> Executive Services – Planning & Evaluation Services Section.</p> <p><i>Target Date for Completion:</i> 2005 June 30.</p>

Recommendation # 11	EPS Response and Action Plan
<p style="text-align: center;">Time Transfers</p> <p>The OCA recommends that:</p> <ul style="list-style-type: none"> a) Staff Sergeants, or higher (to ensure one-up approval as required), approve hourly time transfers between Members of differing rank. b) The EPS documents the Time Transfer process in the Policy and Procedure manual. c) The EPS considers including “Time Transfer” as an agenda item during the next negotiation of the Collective Agreement. The purpose would be to provide direction in the Collective Agreement if hours are being transferred between members of different rank or pay. 	<p><i>Response:</i> Recommendation Accepted.</p> <p><i>Action Plan:</i></p> <ul style="list-style-type: none"> a) Management will ensure that Staff Sergeants, or higher, approve hourly time transfers between members of differing rank. b) An entry will be added to the Policy and Procedure manual advising members the process for transferring hours from one member to another. c) The consideration as to whether part “c” will be addressed will be made by the EPS Bargaining Committee based on its determination as to the significance of this issue in the Collective Bargaining Process. As this issue is included in the Collective Agreement it cannot be addressed until the next collective bargaining process is initiated. <p><i>Area Responsible:</i> Executive Services Division – Professional Standards Unit / HR Division</p> <p><i>Target Date for Completion (parts a & b only):</i> 2005 March 31.</p>