Winnipeg

Animal Services By-law Enforcement Audit - Final Report December 2010

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Audit Department

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Community Services Department ▪ Services communautaires
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June 20, 2011

Animal By-law Enforcement Audit– memo from COO of Animal Services

I welcome the Audit Report of City Auditor Brian Whiteside and appreciate the thorough, comprehensive efforts he and his team put into an independent review of the by-law enforcement element of the City of Winnipeg Animal Services Agency.

I am encouraged by the worthwhile recommendations from the Audit Report and welcome the opportunity to work with our strategic team to better our Agency. For over 100 years, Animal Services has served our community and the Audit Report's examination of our by-law enforcement element offers us an independent review to better our front line service.

While by-law enforcement is a substantial part of our operation, I would like to take this opportunity to highlight some other aspects and accomplishments of the Animal Services Agency that our community can also be proud of.

Overview of Animal Services Agency

The mandate of the Animal Services Agency is to promote, protect and safeguard the health of the community by establishing and maintaining an urban environment which permits the City's human and animal populations to co-exist free of conditions which adversely affect the health, safety and enjoyment of the community. Animal Services Agency is responsible for the enforcement of animal care and control by-laws to minimize risk in the communities served.

Animal Services is primarily responsible for the following services:

Sub-Service	Description
Licensing	o Animal licensing and registration o Animal permits
Adoption/Education	o Adoption of unclaimed dogs o Public education programs on responsible pet ownership
Kennelling	o Kennelling and care for stray animals and dogs running at large picked up by the Agency o Quarantine kennelling for biting dogs
By-Law Enforcement	o Enforcement of all animal related by-laws o Neighbourhood dispute resolution o Investigation and response o Picking up injured animals o After hours emergency response o Investigation of illegal animal complaints

There have been several significant progress highlights in Animal Services in 2010 and since the completion of this Audit analysis which are important to acknowledge.

Highest number of active licenses
Animal Services achieved a record 41,590 active dog licenses in 2010.

Highest number of adoptions
Animal Services has experienced a 100% increase in adoptions in just two years. This increase has been due to many new initiatives at Animal Services. The Agency is active on Petfinder.com. The website allows the Agency to post pictures and videos of dogs available for adoption. This enables people to become more interactive with the dogs without having to physically come to the facility.

High number of service requests
In 2010, Animal Services responded to 10,568 service requests. These requests have more than doubled since the implementation of 311. Requests totaled 5,862 in 2008. Service requests included for example, animal licensing, neighborhood dispute resolution, after-hours emergencies, police and fire assists, enforcement of related by-laws, investigation and response to animal related complaints, and inquiries including stray dogs, illegal animals and injured animals.

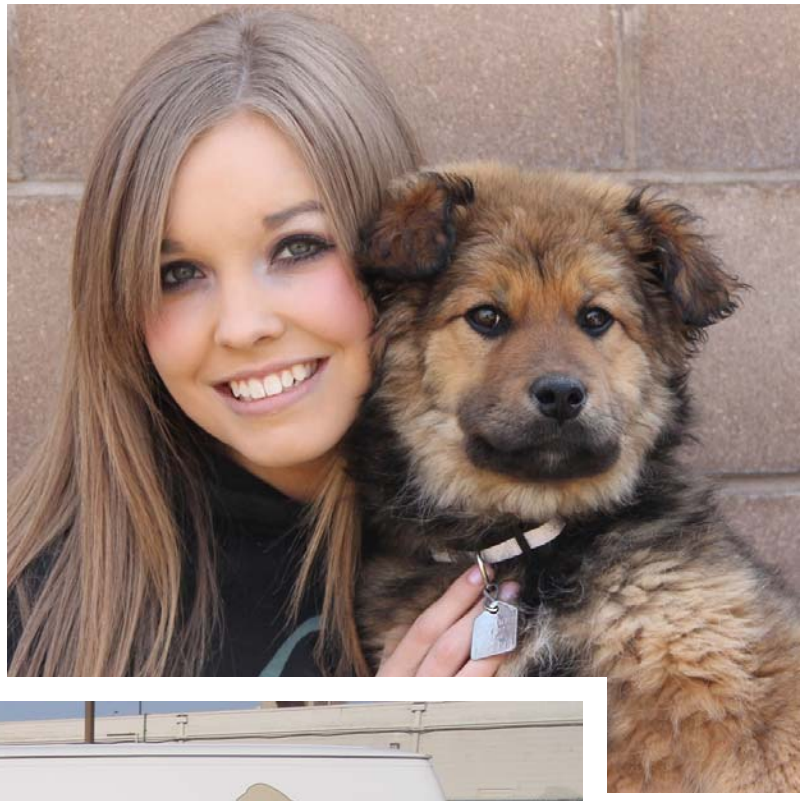
Strong Animal Services Volunteer Base
Animal Services' volunteer group launched a Facebook page which has helped increase the number of adoptions. The site has attracted around 3,500 Facebook users. It offers fans information on upcoming events, available dogs and much more. The Agency's dogs are now featured monthly on radio stations and appear in local newspapers.

Foster Program
In 2010, the Agency expanded its foster program. When the Agency reaches capacity, dogs are transferred to temporary foster homes. In addition, dogs needing specialized care are also placed in foster homes. Animal Services works closely with the Humane Society, Darcy's Arc, Winnipeg Pet Rescue Shelter, and other rescue groups. The Agency openly collaborates with the organizations through transfers of dogs. Through this progressive collaboration, numerous additional dogs are adopted through partner facilities.

Enhanced Community Education and Outreach Initiatives
The Agency has expanded educational programs through volunteerism, work experience, special programming for developmentally disabled adults, and school outreach programs. An improved Agency image and more visitors have also contributed to the significant increase in adoptions.

Online Dog Licensing
In 2010, the Agency developed online dog licensing which is now fully functional. Users can visit Winnipeg.ca/animalservices to purchase or renew a dog license. In addition, users can make a donation to help sick and injured dogs in the care of Animal Services. Since its launch in 2011, 830 new license sales have been achieved through the online payment system.

Sincerely,
Leland Gordon
Chief Operating Officer
City of Winnipeg Animal Services Agency




Protecting
People &
Animals
EMERGENCY CALL OUT VEHICLE
Winnipeg
Animal Services
Agency
PROTECT YOUR "BEST FRIEND"

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EXECUTIVE SUMMARY

The Animal Services Special Operating Agency ("the Agency") is responsible for enforcing the City's animal related by-laws. An audit of the Animal Services Agency was added to the City Auditor's 2009-2010 Audit Plan. Due to ongoing discussions regarding the future service delivery model, the audit was limited to a review of the Agency's by-law enforcement efforts.

The objectives of this audit were:

- to assess the efficiency and effectiveness of the by-law enforcement function in the Animal Services Special Operating Agency; and
- to assess the performance measurement system used for evaluating the by-law enforcement function.

Our audit found that the Agency had some positive signs in its enforcement performance, including a decrease in dog bites reported each year and the number of dogs euthanized. Other trends, such as dog licensing levels, are not as favourable and have in fact been declining for at least the past six years.

A lack of reliable and timely performance information hampered much of our analysis of enforcement effectiveness. We believe that not having a properly designed and implemented performance management system prevents the Agency from analyzing its success and from making value-added changes to operations. The Agency does not set operational targets other than to increase licensing compliance to 60%. As a result, we developed and analyzed a series of measures to provide a basis for the agency to construct a performance management system.

The requirement to license a dog has the lowest compliance rate of the provisions in the City's two animal by-laws. There are only an estimated 31% of all dogs in the city that are licensed. From our audit work, we found that the difficulty in enforcing dog licensing primarily rests in the methods that are being used by the Agency. It only comes into contact with about 4% of the city's dog population per year under the current strategies, leaving an estimated 65,000 unlicensed dogs that are not observed annually. The licensing trends since the Agency's inception make it clear that current strategies are not effective for increasing compliance. The Agency will have to take a more proactive approach to see significant positive changes in the compliance rate, including attending common dog-walking areas on a day-to-day basis and developing a targeted enforcement campaign. New enforcement strategies will also require enhanced training in customer service delivery and conflict resolution for the Agency's Animal Service Officers.

We observed that the addition of the City's 311 Service greatly increased the service requests for the Agency in 2009 resulting in an increased demand on the Agency's resources. We identified several opportunities to enhance management practices and information, which will enable the Agency to better deliver the highest level of service to the public with the available resources.

MANDATE OF THE CITY AUDITOR

The City Auditor is a statutory officer appointed by City Council under *The City of Winnipeg Charter*. The City Auditor reports to Council through the Audit Committee (Executive Policy Committee) and is independent of the City's Public Service. The City Auditor conducts examinations of the operations of the City and its affiliated bodies to assist Council in its governance role of ensuring the Public Service's accountability for the quality of stewardship over public funds and for the achievement of value for money in City operations. Once an audit report has been communicated to Council, it becomes a public document.

AUDIT BACKGROUND

The Animal Services Special Operating Agency was created from the former Animal Services Division of the Community Services Department in January, 2000. The Agency is mandated to promote, protect and safeguard the health of the Winnipeg community in connection with issues arising from pet ownership. The two approaches utilized to achieve this mandate are by-law enforcement and public education. An audit of the Animal Services Special Operating Agency was added to the City Auditor's 2009-2010 Audit Plan. The audit focuses on the strategies and management practices used in the by-law enforcement function and the performance measures used to evaluate those strategies and results for the period ending December, 2009.

AUDIT OBJECTIVES

The objectives of this audit were:

- to assess the effectiveness and efficiency of by-law enforcement in the Animal Services Special Operating Agency; and
- to assess the performance measurement system used in evaluating the by-law enforcement function.

AUDIT APPROACH

We have conducted the audit in accordance with generally accepted auditing standards. **Appendix 1** provides a flowchart of the audit process.

- We conducted interviews with staff from the Animal Services Special Operating Agency, the Legal Services Department, Winnipeg Police Service, the Community Services Department, the Public Education Branch of the Corporate Support Services Department, the Treasury Branch of the Corporate Finance Department, and the 311 Call Centre;
- We conducted interviews with staff from the Winnipeg Humane Society and the Collections Branch of the Manitoba Justice Department;
- We reviewed legislation pertaining to the Agency's operations, including *The Pound By-law*, *The Exotic Animal By-law*, relevant sections of *The City of Winnipeg Charter*, *The Provincial Police Act*, *The Summary Convictions Act*, and *The Criminal Code of Canada*, and obtained legal opinions on our interpretation of the legislation;
- We reviewed public and internal reporting documentation for the Agency; and

- We performed limited industry research from publicly available materials from other municipal animal service agencies and other organizations in the animal industry, and interviewed the Director of Animal & Bylaw Services for the City of Calgary.

Our conclusions are based upon information available at the time of the report. In the event that significant information is brought to our attention after completion of the audit, we reserve the right to amend the conclusions reached.

INDEPENDENCE

The team members selected for the audit did not have any conflicts of interest related to the subject matter of the audit.

AUDIT SCOPE

The Alternate Service Delivery Committee requested that operational reviews of the Special Operating Agencies be included in the City Auditor's 2009-2010 Audit Plan, which was endorsed by Audit Committee. Due to ongoing negotiations with external stakeholders regarding the service delivery of the Agency, the City Auditor recommended the scope of the audit be reduced to the by-law enforcement function for the service only. Cat enforcement was only examined in the context of overall enforcement because the numbers of calls relating to cats are only about 1% of all the Agency's calls for service.

Our analyses were limited by the inability to obtain a reliable estimate of the city's dog population. The most reliable source for this figure was an Ipsos Reid Survey conducted in 2005. While it is reasonable to assume that the dog population has increased since the 2005 survey, a more recent estimate cannot be made reliably; therefore, the original estimate from the 2005 survey is used in this report. We note that the Agency's actual operating results could differ from our analyses due to this estimate.

The quality of the analyses and recommendations made in the report was limited by the availability of management information within the Animal Services Special Operating Agency. During the review, we were either unable to obtain complete information or the information was not maintained by the Agency to support our analyses. We have noted the instances where this affects our analysis within the report.

AUDIT CONCLUSIONS

The audit work performed led us to the following conclusions:

- Compliance performance measures for some of the aspects of the City's animal by-laws remain virtually unchanged from year to year with the exception of dog licensing which has the lowest compliance rate of any aspect of the by-laws. Licensing had seen growth in the first few years of the Agency's operations but has been steadily declining for the past six years. Unless strategic changes are made to the Agency's enforcement program, significant increases in licensing compliance are not likely to occur.

- A fully functioning performance measurement system does not exist in the Agency. Key measures and targets to completely evaluate the Agency's success have not been identified or tracked. The result has been status quo or declining performance. A properly functioning performance measurement system must be implemented for the Agency to monitor new enforcement strategies and determine if objectives are achieved.

ACKNOWLEDGEMENT

The Audit Department wants to extend its appreciation to all of the stakeholders who participated in this audit and especially the Animal Services Special Operating Agency's staff for their time and cooperation.

Members of the Audit Team
Bryan Mansky, MBA, CMA, CIA Deputy City Auditor Micheal Giles, CA Auditor



December 2010

Brian Whiteside, CA•CIA
City Auditor

Date

ANIMAL SERVICES SPECIAL OPERATING AGENCY BACKGROUND

MANDATE of the ANIMAL SERVICES SPECIAL OPERATING AGENCY

To promote, protect and safeguard the health of the community by establishing and maintaining an urban environment which permits the city's human and animal populations to co-exist free of conditions which adversely affect the health, safety and enjoyment of the community. Animal Services is responsible for the enforcement of animal care and control by-laws to minimize risk in the communities served.

- *The Animal Services Special Operating Agency Operating Charter Section 2: Policy Framework*

The City of Winnipeg's ("the City") Animal Services Special Operating Agency ("Animal Services" or "the Agency") was created in January, 2000 from what was then the Animal Services Division of the Community Services Department. The service exists for the protection of community health and property in regards to animal related matters in the city. The former division was established as its own Special Operating Agency ("SOA") to more transparently reflect the service's ability to raise self-sustaining user fee revenues, and to better measure the overall performance of the service. Based on industry and City statistics, we have estimated that about 45% of households in Winnipeg currently have domesticated animals as pets. And, similar to many other jurisdictions, the Agency charges dog licensing fees in order to transfer the costs of the service from general mill rate taxpayers – the majority of whom do not own pets – to the users of the service, pet owners.

The Agency functions under its own operating charter and is responsible for carrying out its mandate through two primary activities: (1) enforcement of *The Pound By-law* and *The Exotic Animal By-law*, and (2) public education programs. The Agency's charter identifies that Animal Services will use business-like principles to operate the service,[1] with its primary financial goal being the reduction of its reliance on mill rate funding, to the greatest extent possible.[2]

Bottom-line financial results are the mechanism for measuring the success of the Agency.

- *The Animal Services Special Operating Agency Operating Charter. Section 5: Financial Framework*

The Agency is evaluated annually by the Alternative Services Delivery Committee ("ASD"), with the primary indicator of the Agency's success being bottom-line performance.[3] Beginning in 2009, the Agency also incorporated reporting to a Board of Directors composed of the City's Chief Administrative Officer ("CAO"), the Deputy CAOs, and the chair of the ASD. We discuss the quality of the Agency's current performance measurement and reporting systems later in the report.

[1] *Animal Services Special Operating Agency Operating Charter*. Page 4: *Special Operating Agency Status*.
[2] *Animal Services Special Operating Agency Operating Charter*. Page 2: *Goals*.
[3] *Animal Services Special Operating Agency Operating Charter*. Page 11: *Costing and Pricing.*

Services Funded By The Dog Licensing Fee

Dog licensing fees are intended to be the primary funding source for the service. Because calls for dog-related services make up about 99% of the Agency's annual calls for service, the licensing fee is a way to fairly distribute the costs of the service through a relatively small annual fee to dog owners.

The services to the community funded by licensing fees are:

- licensing, which identifies dogs' homes and allows the Agency to return runaway dogs quickly;
- animal control services by a contingent of Animal Service Officers;
- a holding facility to provide food, water, shelter, and human care to lost dogs;
- medical treatment for impounded, sick and injured animals;
- an adoption program for unclaimed dogs instead of euthanization;
- an in-house volunteer and work experience program;
- public education programs about responsible pet ownership;
- funding cat sheltering programs offered through the Winnipeg Humane Society;[1]
- promoting dog population control by offering license fee discounts for fixed dogs;
- promoting cat population control by funding subsidized spay/neuter programs offered through the Winnipeg Humane Society;[1] and
- providing enforcement services at City-owned dog parks.

In addition to these services, dog licensing also gives the Agency assurance that:

- the dog has responsible owners who care about funding the services detailed above;
- the dog has owners who have taken preventative measures for the dog's safety and quick return in the event of a runaway;
- the dog is not wild or stray, reducing the chance of spreading animal-borne disease; and
- the dog has been vaccinated for rabies.[2]

When considering all of these items, the dog license fee funds a wide range of animal services. Exhibit 1 illustrates how competitive Winnipeg is for dog license pricing compared to several other metropolitan centres and cities.

Exhibit 1:License Prices

City	Fixed Dog	Intact Dog
Vancouver	$ 36	$ 68
Calgary	$ 31	$ 52
Edmonton	$ 30	$ 70
Hamilton	$ 26	$ 62
Winnipeg	$ 26	$ 61
Toronto	$ 25	$ 60

Source: Animal Services Websites

The Agency has made obtaining licenses very easy by authorizing numerous retail outlets where licenses can be purchased. These outlets include the City's Pound on Logan Avenue, the City's By-law Enforcement Division, the Charleswood Pound, the St. Boniface Bilingual Centre, the Winnipeg Humane Society, local veterinarians and many pet supply retail outlets in the city. In total, there are over 50 different outlets that dog owners can obtain licenses from, or dog owners can apply for licenses through the mail. Dog licenses can now also be purchased online at Winnipeg.ca.

[1] The Agency funds cat kenneling through a $275,000/year contract with the WHS, and provides an additional $75,000/year subsidization of the WHS's 'Spay & Neuter Assistance Program.' *The City of Winnipeg 2009 Detailed Financial Statements*. Page 275, Note 8.

[2] The City of Winnipeg. *The Pound By-law*. Section 20(1)(j).

Enforcement Activities

The Agency enforces animal by-laws by giving warnings or by issuing common offense notices ("notices") to pet owners for animal by-law offenses (see **Appendix 3** for a list of animal by-law offenses). The primary method used by the Agency to detect by-law offenses is via citizen complaints, or "calls for service." After a call is received by the City's 311 service, it is then forwarded to the Agency. An Animal Service Officer ("ASO") will then respond to the call, depending on whether an officer is available to respond at the time and/or the severity of the complaint. The Agency issues offense notices based on a "three-strike" system; generally, an officer will give a verbal or written warning for a first or second offense by an owner, and will issue a notice upon the third offense. We were informed that the "three-strike" policy applies to most animal by-law offenses except in cases of more severe offenses, such as when a dog attacks a human or when a citizen owns a specifically-prohibited dangerous animal. In these cases, the animal is impounded and the owner is issued a common offense notice immediately.

Notices are also summons to Manitoba Provincial court under *The Summary Convictions Act* and require the owner to attend a court hearing for almost all offenses. The only exception is through a special convention of *The Pound By-law* for unlicensed dog offence notices. For an unlicensed dog, a fine may be paid to the Provincial court at a discounted rate within fifteen days of the issuance of the notice. If this early payment is made, the owner does not have to attend court.

Under the stipulations of *The Summary Convictions Act*, the City is not able to collect the fines directly from the owners. Once a notice has been issued to a pet owner, the owner must appear in court (or remit payment by mail to Provincial Court as noted above) and the City can do nothing else to collect the fine. If the owner contends the notice in the court hearing, a judgment will be made in court to uphold the fine in full, reduce the fine, or clear the owner of the charges. If it is upheld, either wholly or in part, collection and remittance of the fine back to the City becomes the responsibility of the Province. We have been informed by Provincial Collections staff that both the amount of the fine imposed by the provincial magistrate and the deadline for payment are entered into the Provincial Justice Department's automated collections system. If the fine is not remitted by the deadline for payment, a notice to disallow the renewal of the pet owner's driver's license is automatically forwarded to Manitoba Public Insurance, and the debt is also handed over to the Province's privately-contracted collection agency. The collection agency may then attempt to have the pet owner's property confiscated or wages garnisheed to satisfy the outstanding debt. We address court related matters later in the report.

Employment of Resources

The Agency currently has six specially equipped trucks, twelve ASOs, two kennel attendants and 7.2 full-time equivalent ("FTE") administrative staff to carry out its day-to-day operations. Its headquarters are located on Logan Avenue in a 12,300 sq. ft. pound that can house thirty-two dogs in the main kennel, and thirteen other exotic or dangerous animals in a separate area.

Animal Service Officers work in shifts of six officers per workday, on a four-on-four-off schedule, seven days a week, from 8:00AM to 7:30PM. One officer is on-call for emergency situations outside of these hours. **Appendix 4** shows how we determined that there are, on average, 4.6 ASOs on duty per shift after considering accommodations for time off from vacations, statutory holidays and other types of leave.

Due to stipulations in the City's collective agreement with CUPE 500, the Agency must hire its Animal Service Officers internally from the City organization, and based on seniority within the bargaining unit. Further human resource matters are discussed later in the report.

Industry

The former COO of the Agency informed us that the Agency attempts to model itself after The City of Calgary's Animal & Bylaw Services Department. Calgary's operations were described as being "the diamond standard" of animal enforcement agencies. Calgary has one of the only animal service organizations in Canada that is able to fund its costs entirely through its licensing revenue. It also has one of the highest licensing compliance rates in North America. The following exhibit portrays a few 2009 statistics for both the city and pet demographics:

Exhibit 2: Jurisdictional Demographics

	Calgary[1]	Winnipeg
City Area (sq. km.)	726	464
Human Population	1,065,455	675,100*
Residential Dwellings	409,881	277,204*
Dog Population	110,242 (in 2008)	100,000^
Cat Population	107,514 (in 2008)	100,000*
Percentage of Dogs Licensed	90%	31%*
Funding Makeup	Fully Funded by Licensing	Subsidized by Mill Rate
Calls for Service	24,737 (excluding barking)	10,558 (total)
Number of Animal Officers	22	12

*Estimated by Winnipeg's City Economist and the Animal Services Special Operating Agency
^Estimated by Ipsos Reid survey (2005)

We contacted the Director of the Animal & Bylaw Services Department for Calgary to discuss the reasons for his organization's success. He primarily attributes its performance to the high level of enforcement that had been employed in Calgary in past years and the skill set of his current staff. The full results of the discussion are dispersed throughout the most applicable sections of this report.

As the exhibit above shows, Calgary has ten more enforcement officers than Winnipeg, and yet both animal populations are estimated to be about the same. One explanation for the higher requirement for officers, which is also illustrated in the chart, is that Calgary has a much larger geographical footprint than Winnipeg. The City of Calgary proper encompasses about 726 sq. km. whereas the City of Winnipeg is about 464 sq. km. We examined the number of officers for both cities on a per km basis and found that, for Winnipeg to be equal to Calgary on an "officers per sq. km." basis, Winnipeg would need to have two more officers on staff, for a total of fourteen ASOs. Another explanation is Calgary's much higher volume of calls for service. Staffing adequacy is also further discussed later in the report.

[1] Figures have been taken from Calgary's 2009 Civic Census Overview and Animal & Bylaw Services Department website.

The Animal Services Agency And The Winnipeg Humane Society

WINNIPEG HUMANE SOCIETY: MISSION

To protect all animals from suffering and to promote their welfare and dignity.

- *The Winnipeg Humane Society Website: "Who We Are", taken February 10, 2011*

The City's Animal Services SOA and the Winnipeg Humane Society ("WHS") are not the same organization—nor does the City run the WHS.

The difference between the two is subtle but important. Whereas the Humane Society's primary mission is protecting the wellbeing of *animals* only, both in and around the city, the Agency's primary mission is protecting the wellbeing of *humans, animals and property* in animal related matters within the city limits alone, which is significant difference in purpose for the organizations. A further item to note is that Animal Services is responsible for enforcing the City's animal related by-laws whereas the Winnipeg Humane Society is not. These differences in missions and functions sometimes result in differences of opinion on how best to control the pet population, but also allow for the opportunity of partnering in many cases where animal interests can be protected.

KEY RISKS FOR ENFORCEMENT

The *potential* key risks associated with the enforcement of animal related by-laws include:

- the Agency may not have sufficient knowledge of animal related by-laws;
- the Agency may not have sufficient understanding of the industry to develop effective enforcement methods;
- the Agency may not understand the extent of their authority in enforcing the by-laws;
- the Agency may not possess the proper tools to enforce the by-laws; and
- the Agency may not have a system in place that allows it to properly evaluate its enforcement success.

TREND ANALYSIS 2000-2009

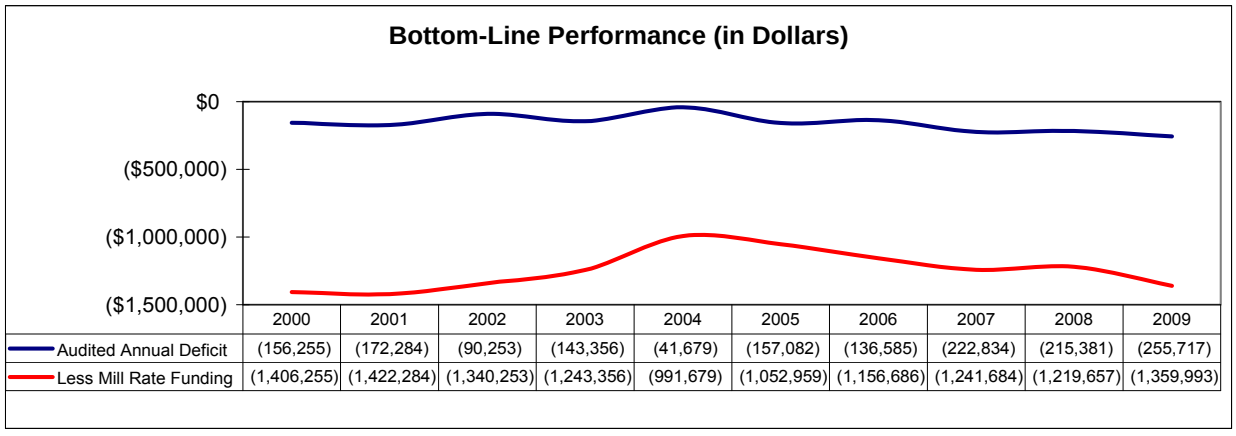
Both the Agency's operating charter and its business plan identify the measures to evaluate its success.[1] We have included a listing of these measures from the business plan in **Appendix 5**, along with an analysis of when the measures have been used in the Agency's past annual selection reports. There are thirteen measures in the listing that have never actually been presented in the Agency's reports. There are eleven more measures that were being reported prior to 2005, but have been completely removed from the reports since then. Because of the Agency's lack of past performance measurement reporting, we have compiled a number of measures to evaluate the success of the enforcement function. The measures are based on our understanding of the service, its enforcement function, and on industry research.

The City's animal by-laws are designed to protect the health and safety of the community in animal related matters; therefore, the success of the service itself hinges on *public compliance* with the by-laws, the level of *enforcement needed* to effect results and maintain compliance with the by-laws, and *customer satisfaction* with the Agency, which assures sustained compliance from the community. The measures that we chose focused on these areas of the Agency's operations. We analyzed the straight line trends in each of the measures by using regression analysis. This identified a couple of anomalous results due to some heavily-influential yet isolated events. We have noted these events below and have explained how they affected each of the areas discussed. In the remainder of this section, we present our analysis of the measures identified above, as well as an overview of the Agency's financial performance and the court outcomes for offense notices issued.

Financial Performance

One of the key performance indicators identified in the Agency's operating charter is the bottom-line. Exhibit 3 illustrates the annual bottom-line for the Agency. It also includes an additional line to show the Agency's operating results without the annual mill rate funding. This second line more accurately represents the Agency's operations because it eliminates the effects of any adjustments in the mill rate funding from year to year.

Exhibit 3: Measurement for Success for the Agency



	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009
Audited Annual Deficit	(156,255)	(172,284)	(90,253)	(143,356)	(41,679)	(157,082)	(136,585)	(222,834)	(215,381)	(255,717)
Less Mill Rate Funding	(1,406,255)	(1,422,284)	(1,340,253)	(1,243,356)	(991,679)	(1,052,959)	(1,156,686)	(1,241,684)	(1,219,657)	(1,359,993)

Source: Annual City of Winnipeg Audited Financial Statements

[1] *Animal Services Special Operating Agency Operating Charter*. Page 4.

When mill rate funding is included, the Agency shows relatively consistent financial results that are just less than breakeven. This is mainly due to annual fluctuations in the mill rate funding provided from the City's general revenue. Without this funding, however, the operations show a significant reduction in yearly operating deficits in 2003 and 2004. These positive results were due to a spike in licensing compliance in 2003—many of the licenses sold were "two-year" licenses, causing the 2004 figures to appear higher because of revenue accounting rules. There was also a slight deficit reduction in 2008 over the prior year, which was also due to a one-year increase in licensing compliance.

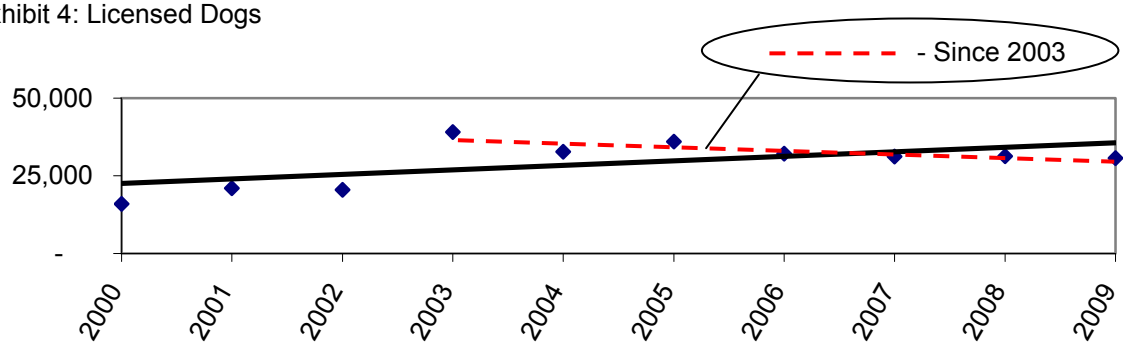
The Agency's overall financial performance shows that it is performing at roughly the same level as when it was created, without much change from year to year. This suggests that the Agency has not achieved its goal of reducing reliance on the mill rate to the greatest extent possible. We discuss strategies that will help to improve the Agency's financial performance in the Observations and Recommendations section of the report.

Compliance

There are four statistical measures that we used to analyze pet owners' compliance rate with animal by-laws. These measures included: the number of licensed dogs in the city, the Agency's annual calls for service, the number of dogs impounded, and the number of dog-bites confirmed.

The measures chosen represent four different aspects of compliance: honour-based compliance, complaint-based offenses, impoundable offenses, and more serious offenses (a subset of impoundable offenses).

Exhibit 4: Licensed Dogs

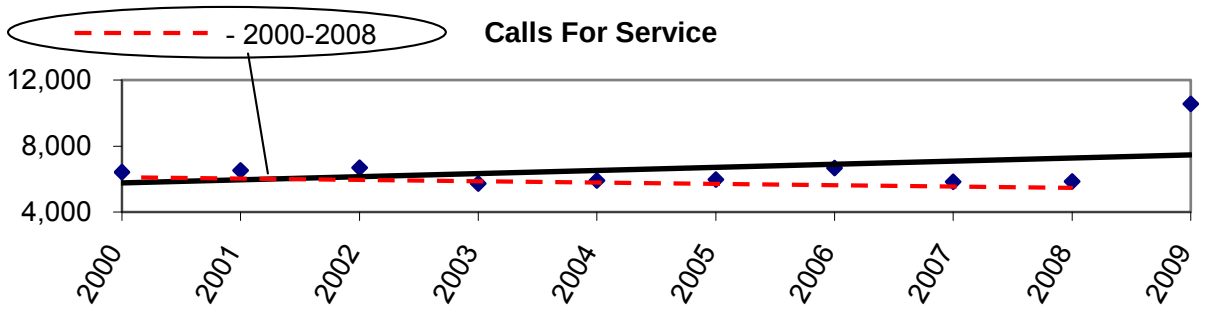


Source: Internal Animal Services Reports

Since dog licensing (honour-based compliance) is not generally an offense that citizens will call to report (the Agency only received sixty-two complaints for unlicensed dogs in 2009) the number of licenses issued illustrates the compliance rate with the by-law requirement that has not been the focus of enforcement to date. Given the estimated 100,000 dogs in the city, of which about 31,000 dogs are licensed, compliance levels are low. While at a first glance the trend appears to be increasing, there are events that influenced the trend line that make it appear this way. First, the compliance levels for the first three years of the Agency's operations were very low and, second, the large spike in 2003 license sales drove the trend line upwards. The 2003 spike occurred because of heavy licensing enforcement in 2002 (see Exhibit 6 on page 16) and increases in the unlicensed dog fine, from $75 to $250, in the autumn of 2003. The two factors caused the spike in license sales. Since the one-year spike occurred in 2003, compliance levels have slowly been trending downward. The Agency deserves commendation

for increasing compliance rates since it was first created. However, concerns arise regarding the continuing decline in compliance over the last six years. We address the licensing compliance strategies in the Observations and Recommendations section of the report.

Exhibit 5: Calls For Service From Citizens



Source: Internal Animal Services Reports

There is also a spike in the calls for service statistic. This was due to one specific event: in 2009, the reception point for service calls changed from Agency-employed operators taking calls to calls being taken in the City's 311 Call Centre. The result was an 80% increase in calls for service over the prior year. Animal Services management believes this sharp increase was due to citizens gaining twenty-four hour a day access to a live 311 call representative, whereas citizens previously would have had to leave a voice mail outside of the Agency's regular business hours (which may have resulted in a hang-up rather than following through with the complaint). Without taking the 2009 calls for service into account, the trend line would have actually been declining, as illustrated in the supplementary 2000-2008 line in Exhibit 5. Declining call rates can be desirable because they can be an indication of greater general compliance with the by-laws (and, hence, fewer offenses to report). However, due to the change in service delivery and the resulting spike in calls, conclusions on overall compliance trends cannot be drawn at this time. The trend line will need to be followed over the next few years to gain an understanding on how the new call in-take process has affected the true demand for service.

Exhibit 6: 2009 Call Increase

Calls for Service		
2008	**2009**	**% Increase**
5,862	10,558	80%

Source: 311 Internal Report

Exhibit 7: Dog Impound Levels

Year	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009
Dogs Impounded	1,487	1,537	1,408	1,213	1,275	1,428	1,349	1,319	1,514	1,492

Source: Animal Services Internal Reports

The number of dogs impounded has an overall flat trend, with some fluctuation of no more than a couple of hundred impounds every year (about a 10% to 15% fluctuation). A possible reason for this trend could be that the Agency is currently operating at or near its resource capacity, either for physical space or for in human resources (animal officers). This is because the number of calls for service increased sharply from 2008 to 2009, with calls for dogs running at large specifically increasing by about 1,000 in that period, and the number of impounds actually decreased. The Agency, however, does not keep capacity statistics for the kennel to determine how often the kennel is at capacity, which prevented us from analyzing the issue further.

Possible human resource constraints are examined in our Observations and Recommendations section.

Exhibit 8: Biting Dog Levels

Year	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009
Bite Reports	410	374	305	302	303	274	263	261	288	355

Source: Animal Services Internal Reports

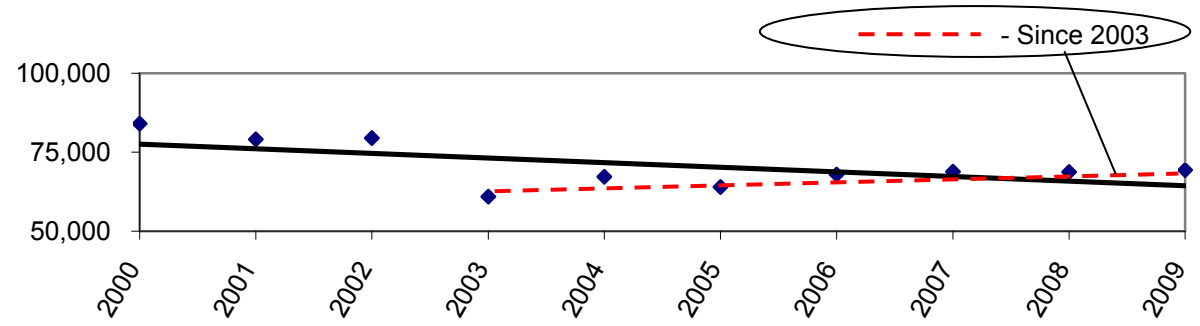
The trend for number of bites reported is favourable and continues to decline. The increase in 2009 is likely due to being an anomalous year, rather than the increase in calls for service, because bites are a more serious offense that would likely be reported whether there was a live call-attendant on duty or not.

Our overall conclusion regarding by-law compliance is that, for the most part, the rate of compliance is trending in the right direction, except for licensing, which requires significant improvement.

By-law Enforcement

The need for enforcement is very closely related to by-law compliance rates—an increase in compliance rates levels may reduce the need for enforcement, and vice versa. Therefore, both calls for service and licensing compliance measures are also used in this analysis to determine the effects of the Agency's current enforcement program on compliance rates. The results are shown below.

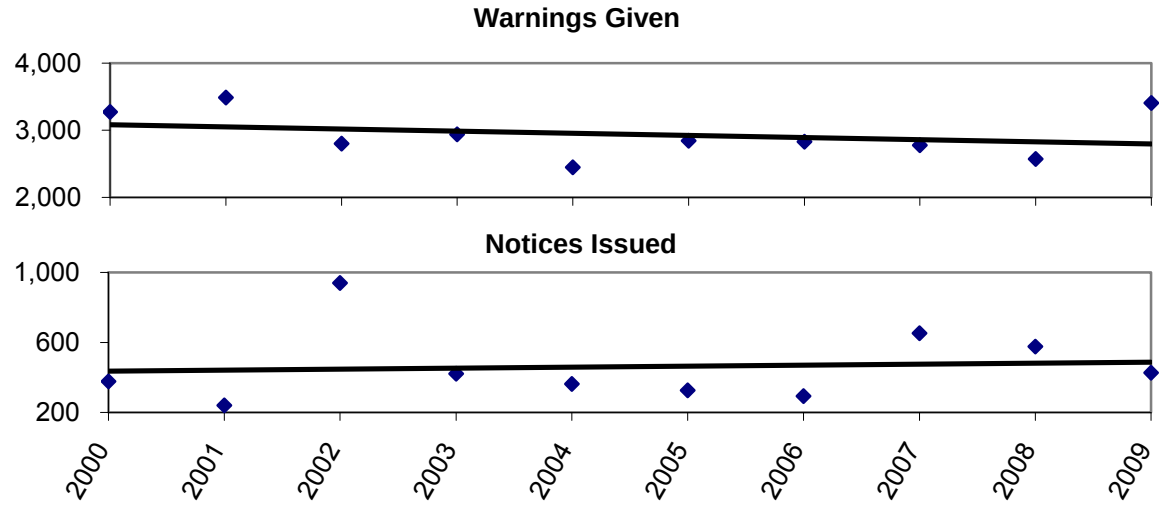
Exhibit 9: Estimated Number of Unlicensed Dogs



Source: Internal Animal Services Reports

The 2003-2009 trend line for unlicensed dogs shows how low the rate of compliance is, and how it is getting worse. The number of unlicensed dog offense notices issued in 2002 was double that of any other year, which we believe was a major influencing factor on the significant drop in unlicensed dogs in the following year.

Exhibit 10: Warnings & Notices Issued



Source: Internal Animal Services Reports

One unexpected trend was what occurred in the number of warnings and notices issued in 2009, compared to the large increase in calls for service. We expected that both warnings and notices issued would increase but, contrary to this, the number of notices issued decreased. This clearly illustrates the effect of the Agency's "three-strike" policy: while the calls for service increased, the number of "third-strike offenses" decreased, along with the notices issued.

The enforcement analysis shows that the current enforcement techniques do not appear to be having much impact on by-law compliance. Changes to current enforcement strategies may be warranted. These issues are discussed further in the Observations and Recommendations section.

Customer Service

Sustained compliance with the by-laws depends on the public's overall satisfaction with the service. The most tangible measures for this area of service are the Agency's capacity to respond to calls for service, and the number of animals that the Agency can return to pet owners.

Exhibit 11: 2009 Call Increase

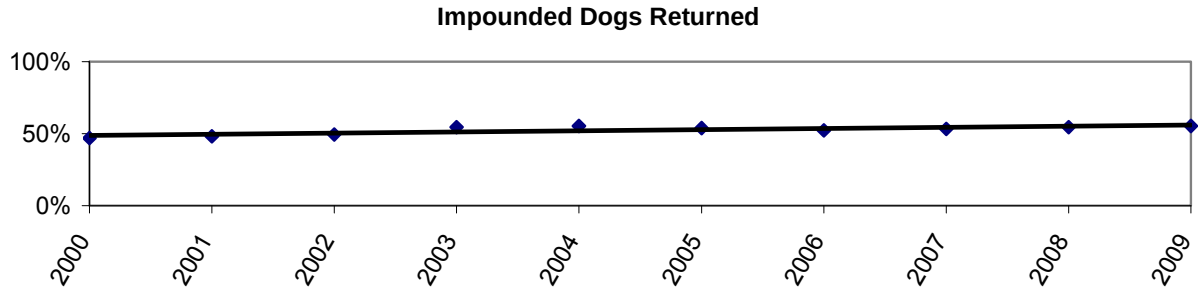
Calls for Service		
2008	**2009**	**Increase**
5,862	10,558	80%

Source: 311 Internal Report

After the addition of the 311 service in 2009, the Agency was able to respond to 10,558 calls for service, with 100% response to the calls. We were informed that examples of responses include Animal Service Officers attending the incidents, writing letters to dog owners, and referring incidents to other agencies. All of the requests for service are categorized and responded to; however, the Agency's Animal Services Information System ("ASIS") system does not have the ability to produce high level management information that summarizes the Agencies responses to the calls. We address the limitations of ASIS in our Observations and Recommendations section of the report.

There is a slight rise in the number of dogs being returned to owners, which shows some improvement in customer service for impounded dogs, especially since the number of licensed dogs is dropping.

Exhibit 12: Dog Return Rates



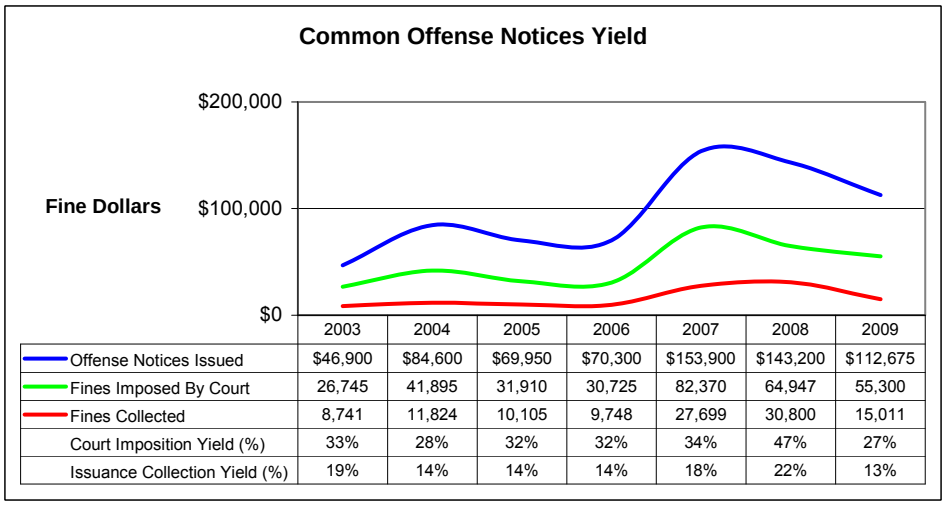
Source: Internal Animal Services Reports

The customer satisfaction measures identify opportunities for the Agency to develop better information on the response to calls for service. They also underscore the importance of increasing compliance with licensing because the identification on the license tag should allow more impounded dogs to be returned to their owners.

Court Disposition Analysis

Once officers have issued notices to pet owners, the next step in the enforcement cycle is the court hearing. Provincial courts decide on the offence notices issued by the City. Despite the City's lack of control over this part of the process, it is still important to analyze court hearing dispositions to evaluate the effectiveness the enforcement program.

Exibit 13: Collection of Offense Notices Issued



	2003	2004	2005	2006	2007	2008	2009
Offense Notices Issued	$46,900	$84,600	$69,950	$70,300	$153,900	$143,200	$112,675
Fines Imposed By Court	26,745	41,895	31,910	30,725	82,370	64,947	55,300
Fines Collected	8,741	11,824	10,105	9,748	27,699	30,800	15,011
Court Imposition Yield (%)	33%	28%	32%	32%	34%	47%	27%
Issuance Collection Yield (%)	19%	14%	14%	14%	18%	22%	13%

Sources: Animal Services Internal Reports and Winnipeg Police Service Internal Reports

Exhibit 8 shows the dollar values of common offense notices issued compared to the amounts enforced in court by Judicial Justice of the Peace ("JJP"), and the actual collections from the fines issued. The difference between the Court determined fines and the amounts actually collected is substantial Since court administration fees are added on top of fines imposed by the Court and are not deducted from the fine itself, the amounts received by the City should equal the amount imposed in court; however, only about 30%-40% are received. It is clear that a significant number of individuals found guilty of a by-law infraction are simply not paying their fines. We discussed this with Provincial Collections staff who confirmed this is the case. He informed us that when a defendant does not have a driver's license to suspend, a credit rating that he or she

is concerned about, assignable property to repossess, or a job to garnishee wages from, there is little consequence for not paying the fine. It is possible under *The Summary Convictions Act* for the Province to issue warrants for arrest for refusal to pay; however, this rarely happens. There may be opportunities to adjust enforcement strategies to improve on these results—we discuss this later in the report.

We noted that in a small percentage of cases fines were being reduced or waived by the Judicial Justice of the Peace. We also found that a significant portion of the cases are being dropped by the City Prosecutor because of technical errors found in the notices themselves. This error rate is discussed in the Observations and Recommendations section.

Before the trend for hearings tried in court can be analyzed, we will explain each hearing outcome that we observed:

- Fines Upheld – Are cases where the JJP finds the defendant guilty, the full amount of the fine is applied by the court. In some cases, the JJP will impose more than the amount specified in the by-law. Additional court fees are imposed on top of the fine, and the defendant is also responsible to pay any sundry expenses such as time lost from work, parking costs, etc.
- Reduced Fines – Are cases where the JJP finds the defendant guilty, but decreases the amount of the fine to be paid. Defendants are still responsible for additional court costs and sundry expenses. We observed that reductions were about one-half of the fine amount stated in the by-law, on average.
- Reprimands – Are cases where a guilty verdict is given, but no fine is imposed. Because court costs are based on a percentage of the fine to be paid, the court costs are minimal or non-existent. Defendants are still responsible for sundry expenses.
- Acquittals/Dismissals – Are cases where the defendant is not found guilty and no fine is imposed. Defendants are still responsible for sundry expenses.

The following analyses have been compiled from raw court data received from the Agency by the Audit Department. Exhibit 14 shows the disposition of all court cases that were not dropped by the City Prosecutor:

Exhibit 14: Court Results for All Hearings Tried In Court

Year	2003	2004	2005	2006	2007	2008	2009
% Fully Upheld	61%	66%	64%	60%	55%	56%	67%
% Reduced	15%	15%	13%	17%	22%	26%	15%
% Reprimanded	21%	15%	16%	16%	23%	15%	14%
% Aquitted/Dismissed	2%	5%	7%	6%	0%	3%	4%
Total	100%	100%	100%	100%	100%	100%	100%

Source: Animal Services Internal Court Docket Records

The results for the cases tried in court show that a guilty verdict was the result in well over 90% of cases heard annually. Notwithstanding, the dollar amounts of the fines levied by the courts varied. Fines were upheld in 60%-70% of cases. Fines were reduced or eliminated in 30%-35% of the cases. Defendants are required to attend a court hearing for all animal by-law

offenses except unlicensed dog offences. In the case of unlicensed dogs, defendants *do* have the opportunity to remit early payment in these cases because of a special provision in *The Pound By-law*. The reduced early payment is one half of fine amount, plus a predetermined court administration fee. We observed that nearly all of the defendants chose to contend the fine in court according to the Agency's court records. Exhibit 15 shows the results of all court hearings for unlicensed dog offenses.

Exhibit 15: Court Results for All "No License" Hearings Tried In Court

Year	2003	2004	2005	2006	2007	2008	2009
% Fully Upheld	60%	69%	53%	59%	57%	45%	69%
% Reduced	16%	18%	25%	31%	28%	45%	21%
% Reprimanded	24%	14%	22%	10%	15%	9%	5%
% Aquitted/Dismissed	0%	0%	0%	0%	0%	1%	5%
Total	100%	100%	100%	100%	100%	100%	100%

Source: Animal Services Internal Court Docket Records

When fines are reduced by JJPs, they are normally reduced by one half of the full fine amount. This is equal to the amount that the defendant would pay if he or she pays the fine upfront by mail, and the defendant would not have to attend court when remitting upfront. From our observations, a scenario where a defendant would pay less than this only occurs 10%-20% of the time. On the other hand, fines are fully enforced about 60%-65% of the time, causing defendants to pay *at least twice* the amount that they would have if they would have remitted the fine upfront. We also observed some cases where the JJPs enforced a higher fine than what is stated in *The Pound By-law*.

OBSERVATIONS AND RECOMMENDATIONS

The remainder of this report examines the issues identified in our Trend Analysis section in greater depth. We believe that addressing these issues are critical to the success of the service and that the recommendations given will improve the Agency's ability to improve the health and safety of the community, enhance service to the public, increase licensing compliance and strengthen the performance measurement system. A complete summary of our recommendations is attached as **Appendix 2.**

Management Practices

Agency Goals

We reviewed the goals that the Agency reports on annually in its selection reports. Its goals are:[1]

1. To reduce reliance on the mill rate support through the enforcement of by-laws and the education of pet owners as to their responsibilities, as they pertain to pet licensing;
2. To increase customer service and satisfaction through improvement to response times and front line service delivery;

[1] Animal Services Special Operating Agency. *2009-2011 Business Plan (Selection Report) and Operating Charter Amendments.* 2009. Pages 7 and 8.

3. To improve health and safety of neighbourhoods through enforcement of animal control by-laws and the administration of responsible pet ownership; and
4. To improve the Agency's public image by providing professional, caring, appropriate responses to citizens'/pet owners' concerns, and humane alternatives to unclaimed animals.

We believe that these goals are consistent with the Agency's mandate of creating an environment where animals and humans, both pet owners and non-pet owners, can peacefully co-exist. We found, however, that the supporting performance measurement systems required to determine whether the Agency is meeting these goals have not been fully developed.

Performance Measurement

To successfully gauge whether the Agency is achieving its goals, there must be a properly developed set of performance measures supporting each of the goals outlined above. We noted in the Trend Analysis that the Agency does not have a comprehensive set of performance measures that they report on annually; therefore, we identified a number of measures that can be used to evaluate the performance of the Agency. Categorized by the Agency's performance goals, these include:

Financial Sustainability

- License compliance rate
- Unlicensed dogs found
- Dogs adopted
- Fine collection yields
- Mill rate subsidy

Increased Public Awareness and Participation

- License compliance rate
- Numbers of dog park campaigns
- Numbers of warnings issued
- Numbers of notices issued
- Numbers of educational campaigns
- Dogs returned to owners
- Dogs adopted
- Shift time attending dog parks

Improved Public Image

- License compliance rate
- Numbers of dog park campaigns
- Obstruction incident percentage
- Numbers of educational campaigns
- Dogs returned to owners
- Common Offense Notice error rates
- Failed Notice issuance attempts
- Dogs adopted
- Dogs euthanized
- Call response times
- Incident handling times
- Shift time attending dog parks

Improved Customer Service

- Percentage of calls responded to
- Calls answered per day
- Numbers of dog park campaigns
- Unlicensed dogs found
- Numbers of warnings issued
- Numbers of notices issued
- Times kennel capacity exceeded
- Dogs returned to owners
- Call response times
- Incident handling times
- Shift time attending dog parks

Improved Health and Safety of Neighbourhoods

- Call locations
- Numbers of dog park campaigns
- Unlicensed dogs found
- Numbers of warnings issued

- Numbers of notices issued
- Obstruction incident percentage
- Numbers of educational campaigns
- Times kennel capacity exceeded
- Call response times
- Incident handling times
- Shift time attending dog parks

The measures above can be used to track performance and results that directly relate to the accomplishment of the Agency's goals. However, the amount of information currently being brought forth to the Agency's oversight bodies is not sufficient to properly inform those bodies if the Agency is achieving its goals.

We also observed that the annual selection reports did not contain measurable targets for the Agency's performance other than the verbally acknowledged target of reaching a 60% compliance rate for dog licenses. Given the numerous facets behind the enforcement function, one performance target is not sufficient to benchmark the Agency's performance. Targets must be developed for all performance measures to evaluate how successful its operations are in comparison to those expectations. Developing performance targets for new strategies will enable the Agency to monitor the success of changes in its service delivery methods. It is therefore imperative that the Agency create targets for its selected performance measures to analyze and improve its performance.

Recommendation 1
We recommend that the Agency establish a comprehensive performance measurement system that provides understandable, reliable, timely, and goal-oriented information on the performance of the enforcement function in relation to the Agency's goals, and set operational targets for these measures.

Management Response
The Agency is in agreement that additional performance measures need to be established with more tangible targets. New measures are being developed and tracked through OMBI, the annual Service Based Budget, and the annual Selection Report. The Agency looks to develop new targets by fourth quarter of 2013.

Revenue Recognition

We found that the Agency does not include common offense notice revenue in its financial statements; rather, the City's Legal Services Department recognizes it. This issue creates an accounting problem. The Agency's financial statements are misstated because the revenue from enforcement should be considered the Agency's revenue, not the Legal Services Department's. Because the Agency is annually evaluated by its "bottom-line performance", failing to include enforcement revenue means that the Agency is not completely evaluating its success at reducing its reliance on the mill rate. Not recognizing the revenue can also impact the diligence in record keeping for the outcomes of enforcement activities, since the Agency has little to do with notices once they have been issued.

Fines revenue originally began to be recognized by the Legal Services Department when the City hired a City Prosecutor to handle court cases for City by-law infractions, rather than hiring external counsel. However, since the revenue is generated by the enforcement efforts of the Animal Services Agency, and not by the Legal Services Department, we believe that the Animal Service Agency should be recognizing the revenue in its financial records. Additionally, any expenditures that the Animal Services Agency must incur to obtain legal services in court to

complete the enforcement cycle should also be recognized in its financial records and reported appropriately.

Recommendation 2
We recommend that the Agency work with the Corporate Finance department to ensure that common offense notices revenue generated through animal by-law enforcement activities is recognized by the Agency in its financial statements.

Management Response
The Agency agrees that both the revenues (i.e. common offense notices) and expenditures (e.g. general government charges) should be recognized in Animal Services. Meetings between Corporate Support Services and the SOA are scheduled beginning May 2011 and steps will be taken to address this recommendation for 2011 and the 2012 – 2014 Selection Report. The Agency plans to obtain a decision on this issue with the affected parties by fourth quarter of 2013.

Response Tracking

One of the goals published by the Agency is to increase customer service through an improvement of response times. While the Agency's software does capture data related to response times to incidents, the number of incidents attended, and responses to incidents, the Agency's ASIS software does not have the ability to provide summarized management information related either to the response times or to the actual responses. For example, the Agency does have service standards in place for response times but ASIS does not currently have the ability to report the percentage of incidents when the service standard has been met.

There is also a limitation in the type of data that is being tracked. Instead of tracking the number of incidents that occur, the Agency tracks the numbers of "calls for service", which are complaints made by the public. Since it is possible for more than one call to be made for one specific incident, such as a barking dog or a dog running loose, the "calls for service" may not accurately represent the total number of incidents reported to the Agency per year. Without knowing the actual number of incidents that resources are required for, it becomes difficult to conduct effective resource planning.

Recommendation 3
We recommend that the Agency develop a system for reporting on actual response times in comparison to service standards, track the number of incidents where resources are required, and set operational targets for these metrics.

Management Response
Through the Agency's ASIS system, incident tracking and reporting information are captured. The response time can vary based on staffing levels, proximity to incident, and severity of incident. As well, since the implementation of 311, service stats and performance measures and response times (service standards) are being tracked and documented.

Management agrees that there should be better incident tracking and will develop new matrixes by fourth quarter of 2012.

Location Tracking

The Agency is also not tracking the locations of the incidents that occur. Out of 10,500 calls for service in 2009, only 140 had locations recorded for them by 311. The Agency's ASIS system does allow for addresses to be input into its database, but does not have the ability to provide summarized management information for the addresses. This prevents the Agency from being able to strategically plan the geographical placement of staff during the day to minimize response times.

Recommendation 4

We recommend that the Agency work with 311 Call Centre management to ensure call-takers attempt to solicit an address (or nearest address of complaint) to track geographical demands for the Agency's resources.

Management Response

In 2009, improvements were made to the interface with 311 such that property addresses were included. This location information is integrated with the Agency's Animal Services System. Presently, address information is captured, and geographical statistics can be generated as of 2011. The Agency does not take a call for service without full complainant information including an address.

IT Systems

The Agency's Animal Services Information System ("ASIS") was installed when the Agency was created in 2000. It has not been updated since that time. Since the Agency has not yet established all of its performance measurements, it is not known whether the ASIS system will have the capability to provide the appropriate management information required. Notwithstanding, this report has detailed the limitations we observed for management information that ASIS was able to provide us. We also detailed its inability to provide information for some of the key measures noted above. This suggests that ASIS may not be appropriate for future information needs. Once the performance measurement system has been fully developed, an evaluation of the system requirements to provide proper management information for the Agency should be completed. At that time, management will be able to determine whether ASIS can meet those needs, or whether it should be replaced.

Recommendation 5

We recommend that the Agency evaluate whether its current information system will be sufficient to handle its future information needs, including an enhanced performance measurement system, and plan for its replacement if it is not.

Management Response

ASIS is an internally developed software tool which has met the needs of Animal Services for many years. It is customizable and was developed by IT. There are also several private Animal Agency software programs on the market. A change either way would require a significant capital investment from Animal Services.

An analysis of current and future needs with respect to the Animal Services Information System is required. This review will begin in 2011/12 and is included in the Agency's IT Plan as well as in the CMS IT plan. The Agency plans to obtain a decision on this issue by fourth quarter of 2012.

Enforcement Strategies

Fine Issuance Policy

In our discussions with the prior COO for the Agency, he communicated a desire to increase the number of enforcement officers for the Agency to further increase its enforcement capacity. The reasoning behind this is that responding to more incidents will increase the number of notices that are issued for offenses, and thereby increase compliance. However, our Trend Analysis clearly illustrated the effect of the "three-strike" policy: responding to more calls for service will increase the number of warnings given to pet owners but will not necessarily increase compliance.

This was the outcome experienced in 2009. The number of incidents responded to increased by about 700 over the prior year because of the large increase in calls for service. The number of warnings issued increased over 2008, but the number of common offense notices issued decreased. Even though the number of warnings increased, licensing compliance continued to decrease and the numbers of dogs impounded remained the same—demonstrating that the numbers of warnings issued has no discernable effect on compliance rates. The effect of the "three-strike" policy can also be observed in the rate at which offense notices are issued. Officers only issue about one common offense notice per full work week, despite the current low level of licensing compliance.

Exhibit 16: Average Common Offense Notices Issued

Weekly Notices per Officer in 2009

Total Offense Notices Issued		426
Weeks in the Year	÷	52
Offense Notices Per Week		8
ASOs on Shift in a 7 Day Week	÷	8 *
Offense Notices Issued By An Officer in a Week		1

*4.6 officers/shift x 1.75 (4-on-4-off) shifts ≈ 8 ASOs staffed per week

We contrast these results with those experienced in 2003. Following a year where the notices issued were much higher than any other year, the fines for unlicensed dogs were raised in 2003, from $75 to $250. These increased license fines were published in notices to the public and garnered front page local media attention,[1] resulting in greater public awareness of the Agency's dedication to enforcement. The 2003 result was a higher licensing compliance than any other year on record. Also, 2003 calls for service decreased and the numbers of dogs impounded were the lowest since the creation of the Agency. This is strong persuasive evidence where a combination of enforcement and public awareness increased compliance with all aspects of the animal by-laws.

From our discussion with the Director of Calgary's Animal Service, we found that Calgary does not have a similar strike-based warning policy; rather, officers have discretion for when to issue most notices, and there is a zero tolerance policy for unlicensed dogs. Our observations for the "three-strike" policy in Winnipeg are clear. It is not effective at increasing by-law compliance. The policy is internally imposed; there is no stipulation in *The Pound By-law* requiring it. Therefore, the appropriateness of the policy should be examined.

[1] Bell, Jason. "D-Day for dog owners: City set to sniff out unlicensed pooches." *Winnipeg Free Press* [Winnipeg] 18 October 2003: A1. Print.

Recommendation 6
We recommend that the Agency review its "three-strike" policy to determine whether it should be eliminated.

Management Response
The Animal Services Agency agrees with this recommendation. The Agency will be implementing a zero tolerance policy for unlicensed dogs in the Fall of 2011.

Error Rates

We noted previously that a significant percentage of court hearings were being stayed by the City Prosecutor because of technical errors in the issuance of common offense notices. The Agency currently does not track its error rate, nor does it use error rates for staff training purposes, or for annual staff evaluations. For the Agency to fully understand its effectiveness in enforcement, it is important to track its error rate and to keep it as low as possible. It is also important to train enforcement staff when systematic errors are found so that they are not continually repeated. We discuss the training implications for the errors later in the report.

The following Exhibit shows the outcomes of all court cases kept on record by the Agency:

Exhibit 17: Court Case Results

Year	2003	2004	2005	2006	2007	2008	2009
Court Decision	77%	64%	60%	56%	79%	67%	65%
Stay of Proceedings	20%	27%	28%	31%	20%	24%	18%
Unknown	3%	9%	12%	13%	2%	9%	17%
Total	100%	100%	100%	100%	100%	100%	100%

Source: Animal Services Internal Court Docket Records

We found that the City Prosecutor stays about 25% of the cases, on average. This figure could possibly be higher because the Agency does not track all case results. Nevertheless, the City Prosecutor confirmed to us that virtually all of the stays are due to technical errors found in the common offense notices issued. We believe that an average 25% rate of error is excessive—translating to about 100 of 400 notices issued annually. To improve enforcement efficiency and to decrease the resources utilized for court hearings that are eventually stayed, the Agency should track and improve its common offense notice error rate.

Recommendation 7
We recommend that the Agency develop an error tracking system for notices issued, set a target for the error rate, and monitor individual staff error rates to ensure that error levels stay within tolerance.

Management Response
The Animal Services Agency agrees that common offense notices (CON's) should be error free. The frequency and type of CON errors will be reviewed with a goal of eliminating and/or reducing errors. Development of a procedural manual and enhanced training for Animal Services Officers will occur within the next year. The Agency plans to complete this manual by fourth quarter of 2012.

Enforcement Structure

Previously, we stated that a court hearing must occur for all of the by-law infractions with the exception of having an unlicensed dog. This ties up a significant amount of time for the City's legal resources, as well as Provincial court time. The City Prosecutor estimated that about one third to one half of his time is spent on litigation matters for the Agency. An equal amount of time can also be reasonably estimated for Provincial legal services staff. Altering *The Pound By-law* so that offences where there is no immediate threat to public health or safety would also not be required to go to court, similar to owning an unlicensed dog, may relieve the time requirements on City and Provincial legal services staff.

Recommendation 8

We recommend that the Agency work together with the Legal Services Department to propose an updated by-law that allows for direct payment on by-law infractions where public health and safety is not put in danger.

Management Response

The Animal Services Agency would embrace a direct payment model which allowed residents the option to pay fines directly at Animal Services or provided a mail-in option. Discussions with Legal Services will be arranged over the next few months to determine what changes need to be made to allow for direct payment to the City rather than through the Provincial court system for certain by-law infractions.

The Animal Services Agency would embrace a direct payment model which allowed residents the option to pay fines directly with a mail-in option for by-law infractions where public health and safety is not put in danger. Discussions with Legal Services will be arranged over the next few months to determine what changes need to be made to allow for direct payment. The Agency plans to complete this issue by fourth quarter of 2013.

Licensing Compliance

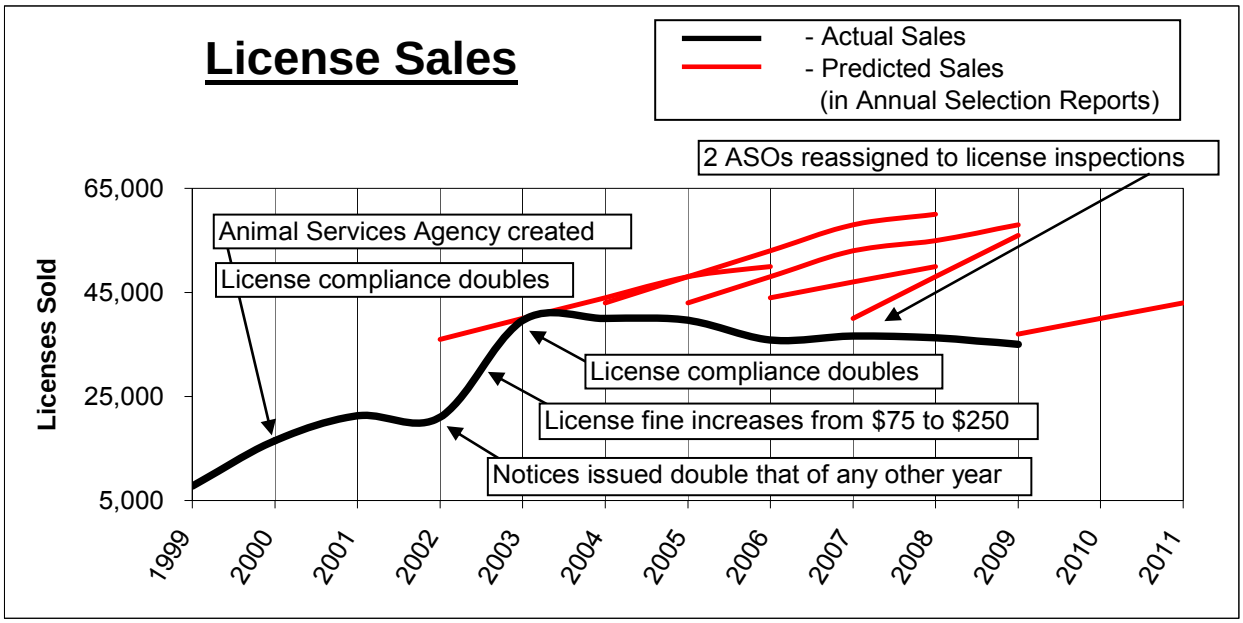
The requirement of *The Pound By-law* with the lowest compliance is for pet owners to license their dogs. There are currently an estimated 70,000 unlicensed dogs—which is more than twice the number of actual licensed dogs in the city. The scale of this current poor compliance is not unexpected, however, because licensing is also the most difficult aspect of *The Pound By-law* to enforce. This is primarily due to the current enforcement methods that are employed by the Agency.

The Agency's main enforcement strategy relies on receiving complaints from the public to detect by-law offenses; however, citizens generally *do not* call to report unlicensed dogs. In fact, of the roughly 10,500 animal related calls in 2009, only sixty-two were complaints for unlicensed dogs. With a possible 70,000 unlicensed dogs in the community, sixty-two complaints in a year provide little help in finding unlicensed dogs. Our conclusion is that this enforcement technique is not producing effective results.

The other method the Agency uses to find unlicensed dogs is by examining *all* dogs reported in all public complaints, to determine if those dogs have licenses. This enforcement method only allows the Agency to come in contact with about 4% of the dog population (or 4,000 dogs) every year, leaving an estimated 65,000 unseen and unlicensed dogs in the community. Relying on this strategy to increase license compliance also will not produce significantly efficient or effective results.

Exhibit 18 examines the licensing trend in greater detail. It also shows what the Agency had predicted license sales to be in each of its annual selection reports.

Exhibit 18: Actual Dog License Sales Vs. Annual Predictions of Sales



Source: Animal Services Special Operating Agency Annual Selection Reports
1999 sales provided by Animal Services Special Operating Agency

The exhibit illustrates that the *only* years that the Agency saw a significant increase in licensing compliance were the years where there was public awareness of the Agency's licensing enforcement *and* there was a concerted effort to enforce. It is clear, upon closer examination, when there was greater enforcement and more public awareness the compliance rate doubled—each time. If this phenomenon were to occur again, the Agency would reach their internal goal of 60% licensing compliance.

It is reasonable to believe that the bulk of unlicensed dogs are owned by people who are responsible enough to maintain all of the aspects of *The Pound By-law* except the requirement to license their dogs. Therefore, a simple way to significantly increase licensing compliance is to search for unlicensed dogs on common dog-walking paths and in City dog parks. Patrolling popular dog-walking areas is not a new strategy in the animal services industry. The Director of the Animal & By-law Enforcement Services Department in Calgary informed us that his department has been employing this strategy for years, by making unannounced visits to dog parks to find unlicensed dogs. He noted that about 10%-15% of the service's time is spent in parks, and that more time was spent when compliance rates were lower in the past.

Options available to the Agency include making dog park patrolling a part of the officers' day-to-day activities, developing a targeted campaign to search for unlicensed dogs outside of regular service hours, or a combination of both strategies. The Agency has recently made it an internal policy to spend their time when they are not responding to complaints attending dog parks, but there is no specific guidance for when this should be performed. The benefits are that officers stay active in periods when there may not be complaints to respond to, and it is a possible method to find unlicensed dogs in public. The drawback is that the approach depends entirely

on the volume of complaints; if complaints are high, then it is possible that inadequate time will be spent on dog park enforcement. The strategy also reduces the opportunity to interact with dog owners who work regular business hours and walk their dogs after the officers' shifts are over.

The Agency could also develop a targeted enforcement campaign to devote specific, non-traditional times to patrolling dog parks and common dog-walking routes for unlicensed dogs. This provides a greater opportunity to interact with owners who walk their dogs outside of regular business hours. This approach could require additional resources for officers enforcing outside of regular service hours or revising the work schedule for a portion of the officers. Potentially, any additional costs associated with the strategy could be offset by revenues generated from increased licensing compliance.

Regardless of which strategy is selected, it must be complemented with enhanced training for staff—which is discussed later in the report—an evaluation of new risks, and monitoring of results. A more aggressive enforcement strategy could place Animal Service Officers in confrontational situations. This needs to be monitored and plans developed to address this risk such as exploring potential partnerships with the Winnipeg Police Service to avoid disputes.

Recommendation 9
We recommend that the Agency develop an enforcement strategy for dog parks and other common dog-walking routes.

Management Response
The Animal Services Agency agrees that an enforcement strategy targeted at dog parks and other common dog-walking routes would provide an opportunity to educate the public while increasing dog licensing compliance. Animal Service Officers currently patrol dog and other parks as resources allow. Resource availability is staffing and incident volume dependent. The Agency is working in partnership with Parks and Open Spaces Park Ambassadors in the summer of 2011 on a dog park educational campaign.

It should be noted that progress has been achieved with respect to Dog Licensing compliance in Winnipeg. A comprehensive Marketing Plan for Animal Services was developed in the Fall of 2009 with the intent of increasing dog license sales. In 2010 the number of dog licenses per 100,000 population in Winnipeg was 6079.81. In comparison with the Ontario Municipal Benchmarking Initiative (OMBI) the average 2009 municipal result was 3,919.49 per 100,000 population. Animal Services achieved a record 41,590 in active dog licenses in 2010. The Agency plans to increase attendance of dog parks and other common dog walking areas starting in the third quarter of 2011.

Public Education

Public education is a key component to the success of any comprehensive enforcement strategy. Fair enforcement requires that citizens are appropriately informed of what the by-laws are and how they are to be enforced. There are several police enforcement awareness campaigns that can serve as a model; for example, WPS enforcement campaigns dealing with drinking and driving, speeding, or cell phone use while driving, make use of newspaper, radio and television to get the message out to the public.

Animal Service's Agency Website

The Agency's website is the most publicly accessible point of information about the service. The website must provide information about how to comply with the by-laws in a clear, articulate and complete fashion to provide true service to the public. Recent media coverage regarding the enforcement process suggested that the website does not provide this information in an understandable fashion.[1] We reviewed the Agency's website to gain an understanding of its educational capacity through the site. We noted that the website can be difficult to navigate and that citizens may have to perform an extensive search to find answers for their questions. Pet owner responsibilities, or links thereto, are not readily apparent on the home page. The website also relies heavily on links to the by-law documents on the City's Document Management Information System. This requires citizens to read through the actual by-laws to obtain current information on what constitutes an infraction, which animals are illegal in the city, and the Agency's enforcement authority and methods. By-laws are written for the legal system, containing technical legal language, such as "due process", "mutatis mutandis", or "satisfactory evidence"; they are not written specifically for educating citizens on everyday behavior.

The most significant aspect of pet ownership from a by-law perspective is what constitutes an infraction under the by-laws. This information should be readily available on the website without citizens having to extensively search the site, or the by-laws, to provide adequate customer service.

Recommendation 10

We recommend that the Agency update its website to ensure that pet ownership and by-law compliance information provided is complete, easily accessible and understandable for all citizens.

Management Response

The Animal Services Agency website patterns the City of Winnipeg website based on functionality and appearance (look and feel guidelines). The Animal Services portion of the City of Winnipeg website is frequently updated and is continually looking at ways to improve including user friendliness. Particular attention will be paid to the use of plain language in educating the public. The Agency continually monitors content on the website and plans to complete a thorough examination of the website in the second quarter of 2012.

Other Media Announcements

The Agency has the opportunity to genuinely enhance service by creating public awareness of enforcement campaigns. Educating the pet owners about their responsibilities and the consequences of failing to comply with the by-law should lead to greater compliance with the by-laws. We previously reported that licensing compliance doubled each time there was public awareness coupled with increased enforcement.

Public Service Announcements ("PSA") through local media can be utilized as a low cost method to educate the public. Local cable access segments can also be produced to educate the public on responsible pet ownership and the other services provided by the Agency. The City of Calgary has a number of segments that it runs on the local cable access network as well as making the videos available for download on its own website.

[1] Adam, Charlene. "Pet bylaw infractions can be costly: A cautionary tale." *Winnipeg Free Press* [Winnipeg] 29 September 2010: A3. Print.

Recommendation 11
We recommend that the Agency enhance its current public education campaign to include PSAs and local cable access television spots informing the public of the numerous services funded by dog license fees, the requirements of the by-laws, enforcement programs, and Provincial court case results.

Management Response
Animal Services actively works with the media and has expanded its use of advertising through print, TV, bus kings, and radio media. A comprehensive licensing Marketing Plan was developed and implemented in the Fall of 2009.

Training

Addressing some of the issues we found in the enforcement system will require additional training for enforcement officers. The prime concern for the Agency is safety of citizens and officers alike. The Agency must ensure staff are properly trained to defuse possible confrontational situations and to educate citizens they interact with.

The ASOs do not have current customer service or conflict resolution training. The manager for the Corporate Education branch informed us that specialized training applicable to by-law enforcement services is available from the Winnipeg Police Service, which would train officers for the various situations they may encounter while on duty.

We discussed employee training with the Director of Animal & Bylaw Services for the City of Calgary. He credited a large part of his department's success to the training his staff receives in conflict resolution. Training is an important tool for to enable officers to interact professionally with citizens. It is also important that the Agency update this training at reasonable intervals.

Recommendation 12
We recommend that the Agency provide all staff with customer service or public relations training. Further, all enforcement staff should also receive conflict resolution training. We also recommend that the Agency develop a training schedule to ensure that enforcement staff skills are current.

Management Response
Animal Services agrees with the need for enhanced training respecting customer service and public relations and will explore a formalized plan to provide this education for staff. In addition, the Agency will assess the need for customized business specific training opportunities that may be required. The Agency plans to complete this issue with the further training by the fourth quarter of 2012.

Enforcement Staff Levels

We identified that Winnipeg's pet population is estimated to be about the same as Calgary's, with both cities having about 100,000 dogs and 100,000 cats. Calgary has twenty-two FTE animal enforcement officers, while Winnipeg has only twelve. This could be interpreted as a reason to increase the number of Winnipeg's Animal Service Officers; however, this is not an appropriate basis because the Agency does not enforce by-laws based on the number of animals in the city. It enforces based on the calls for service received. We noted in Exhibit 2 that Calgary receives at least double the number of calls for service that Winnipeg after the

addition of the 311 call centre.

We also illustrated that the calls for service have increased by 80% over the prior year from the addition of the 311 call centre. While the calls have increased, it is not possible to know exactly how much the number of incidents has increased. In general, the spike in calls indicates that there is a higher demand for service, thereby supporting adding enforcement officers.

Since the Agency's single largest expense is enforcement officers' salaries, we enquired as to how the productivity of the officers' was managed. We found that productivity measures are not tracked. This is a critical gap because the current enforcement program does not appear to have a significant effect on increasing the compliance rate with respect to dog licensing. The analyses we completed in this area were based on raw performance data we received from the Agency and, therefore, have been performed only at a high level. An incident is defined as a call for service that the Agency has responded to and we determined that enforcement officers are attending three incidents in a ten and a half hour shift, on average. It is important to remember that these three incidents could be logged at a single residence in response to a single call.

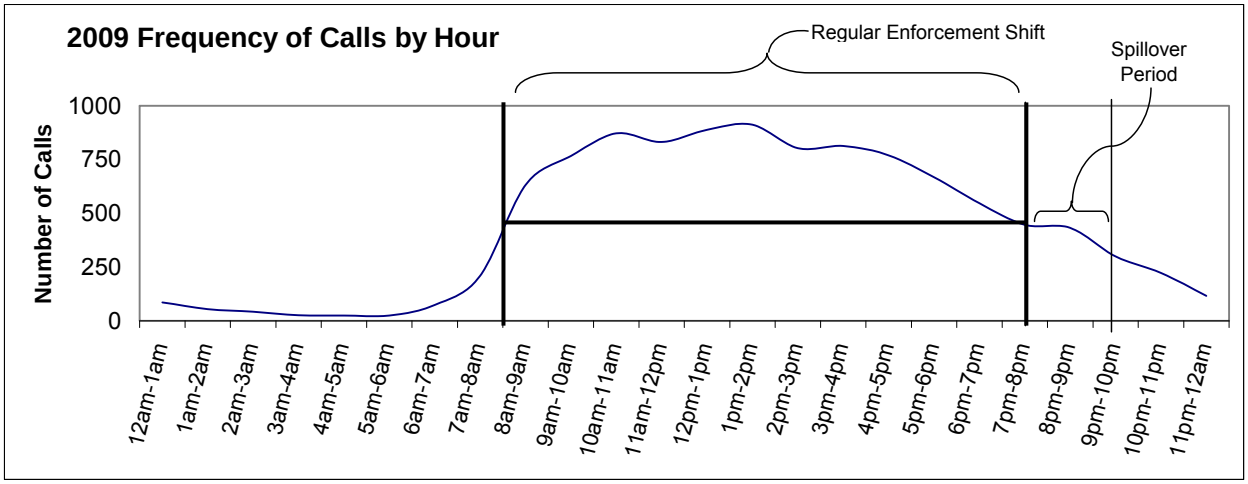
Exhibit 19: Average Daily Incident Response

Daily Calls Answered in 2009

Total Incidents Responded to		4,261
Days in the Year	÷	365
Calls Per Day		12
Trucks On Patrol Per Shift	÷	4
Incidents Responded to By Officers in a Day		3

To ensure the efficiency of the response time, it is crucial that staff shifts are employed when the majority of the calls are taken. As can be seen from the Exhibit 20 below, the regular enforcement shift is near-perfectly placed around this time.

Exhibit 20: Shift Analysis



Source: 311 Call Records

We did note that one half of all after-hours calls are made within the first two hours of the enforcement officers going off duty. One way that the Agency may be able to improve its

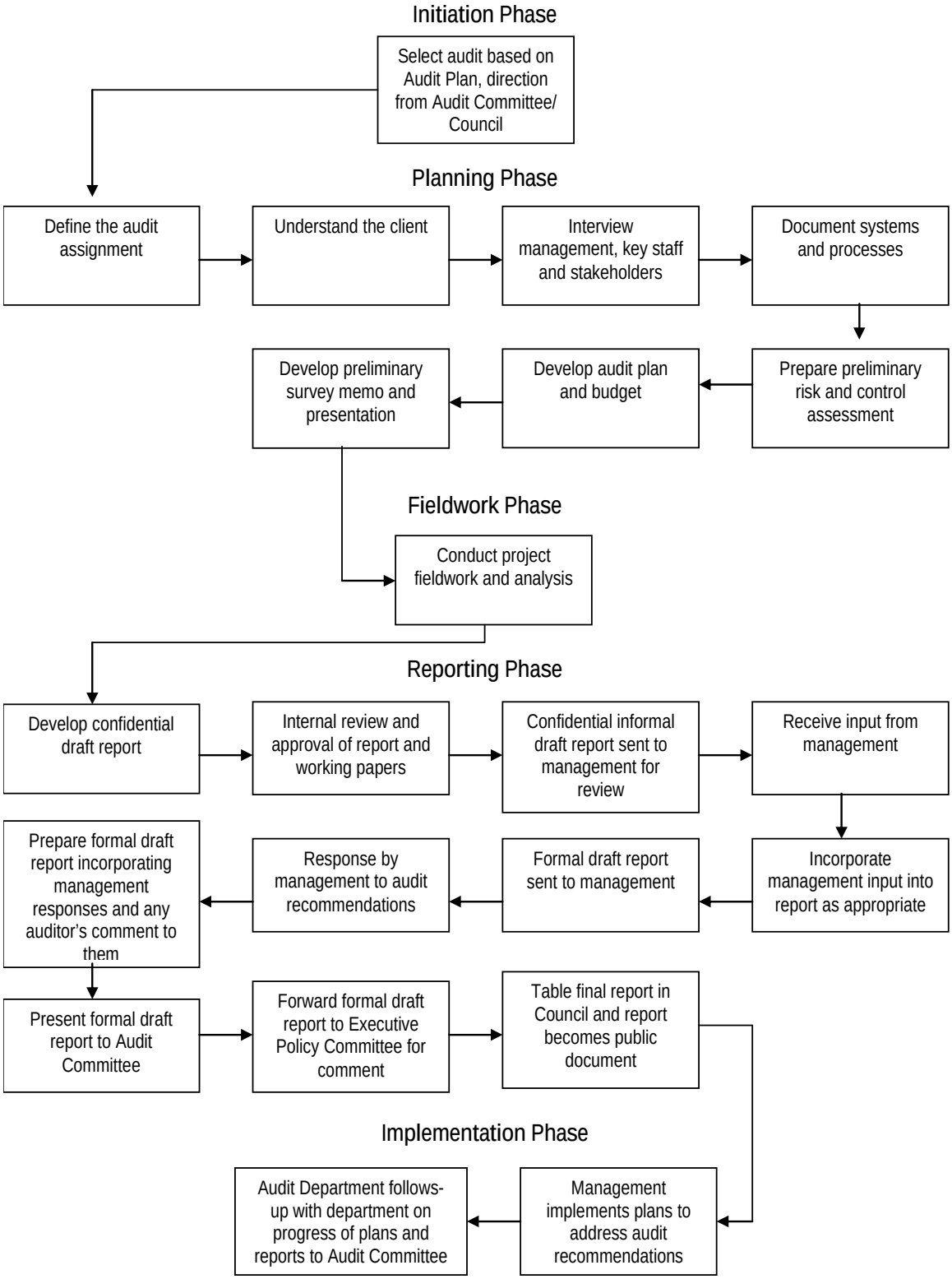
response time to a call is to stagger one of the shifts to cover the period of time before calls drop off significantly.

While there is some evidence to suggest that the number of officers should increase, the issues identified for the lack of performance targets, the “three-strike” enforcement policy, high offense notice error rates, and the need for additional conflict resolution training should all be addressed before adding more staff.

Recommendation 13
We recommend that the Agency perform a workload analysis to determine the benefits of staggering enforcement shifts to provide greater response rates for calls for service.

Management Response
The Agency has examined the issue of shift scheduling for Animal Service Officers in 2010 and has developed new shift schedules. Animal Service Officer shifts will be extended until 9:30pm and will be implemented in 2011, or as soon as staffing levels are constant.

APPENDIX 1 - AUDIT PROCESS



APPENDIX 2 - SUMMARY OF RECOMMENDATIONS

Recommendation 1
We recommend that the Agency establish a comprehensive performance measurement system that provides understandable, reliable, timely, and goal-oriented information on the performance of the enforcement function in relation to the Agency's goals, and set operational targets for these measures.

Recommendation 2
We recommend that the Agency work with the Corporate Finance department to ensure that common offense notices revenue generated through animal by-law enforcement activities is recognized by the Agency in its financial statements.

Recommendation 3
We recommend that the Agency develop a system for reporting on actual response times in comparison to service standards, track the number of incidents where resources are required, and set operational targets for these metrics.

Recommendation 4
We recommend that the Agency work with 311 Call Centre management to ensure call-takers attempt to solicit an address (or nearest address of complaint) to track geographical demands for the Agency's resources.

Recommendation 5
We recommend that the Agency evaluate whether its current information system will be sufficient to handle its future information needs, including an enhanced performance measurement system, and plan for its replacement if it is not.

Recommendation 6
We recommend that the Agency review its "three-strike" policy to determine whether it should be eliminated.

Recommendation 7
We recommend that the Agency develop an error tracking system for notices issued, set a target for the error rate, and monitor individual staff error rates to ensure that error levels stay within tolerance.

Recommendation 8
We recommend that the Agency work together with the Legal Services Department to propose an updated by-law that allows for direct payment on by-law infractions where public health and safety is not put in danger.

Recommendation 9
We recommend that the Agency develop an enforcement strategy for dog parks and other common dog-walking routes.

APPENDIX 2 - SUMMARY OF RECOMMENDATIONS (CONTINUED)

Recommendation 10
We recommend that the Agency update its website to ensure that pet ownership and by-law compliance information provided is complete, easily accessible and understandable for all citizens.

Recommendation 11
We recommend that the Agency enhance its current public education campaign to include PSAs and local cable access television spots informing the public of the numerous services funded by dog license fees, the requirements of the by-laws, enforcement programs, and Provincial court case results.

Recommendation 12
We recommend that the Agency provide all staff with customer service or public relations training. Further, all enforcement staff should also receive conflict resolution training. We also recommend that the Agency develop a training schedule to ensure that enforcement staff skills are current.

Recommendation 13
We recommend that the Agency perform a workload analysis to determine the benefits of staggering enforcement shifts to provide greater response rates for calls for service.

APPENDIX 3 – ANIMAL BY-LAW OFFENSES

The following items are considered to be finable by-law offenses under the City of Winnipeg's *Pound By-law No. 2443/79* and *Exotic Animal By-law No. 3389/83*. The animals' owners are responsible for the offenses noted.

By-law Offense	By-law Section
All Animals	
Interfering with or obstructing authorized persons who are attempting to impound an animal	**2443/79(15)**
Dogs	
Owning a dog over the age of six months that is unlicensed	**2443/79(17)(a)**
Transferring a license from one dog to another	**2443/79(17)(b)**
Not having a license tag securely fastened to a dog's collar	**2443/79(17)(c)**
Removing a license tag from a dog	**2443/79(27)**
Having a dog in public that is not on a leash	**2443/79(19)(1)**
Having a dog in public with a leash longer than six feet	**2443/79(20)(1)(i)**
Allowing a female dog that is in heat outside of the owner's home	**2443/79(19)(2)**
Allowing a dog to run at large off the owner's property	**2443/79(20)(1)(a)**
Allowing a dog to damage property not owned by the dog's owner	**2443/79(20)(1)(d)**
Allowing a dog on a school ground or playground	**2443/79(20)(1)(h)**
Allowing a dog off a leash in public other than in approved off-leash areas	**2443/79(20)(1)(i)& 2443/79(27.1)(1)**
Not complying with off-leash park rules	**2443/79(27.1)(2)**
Allowing a dog to defecate on property other than the owner's property without removing it	**2443/79(20)(1)(c)**
Allowing a dog to upset a waste receptacle	**2443/79(20)(3)**
Allowing a dog to chase a person or animal	**2443/79(20)(1)(g)**
Allowing a dog to bite a person or animal	**2443/79(20)(1)(g.1)**
Owning a vicious dog that is not muzzled or securely fastened	**2443/79(20)(1)(f)**
Allowing dogs to disturb the peace by barking or howling	**2443/79(20)(1)(b)**
Owning a dog that has not been vaccinated for rabies	**2443/79(20)(1)(j)**
Owning more than three dogs without a license or Community Committee permission	**2443/79(30)**
Dangerous Dogs	
Not having a dangerous dog license	**2443/79(18)(2)(b)**
Not having comprehensive general liability insurance for the dog of at least $300,000	**2443/79(17)(e.1)**
Not having an electronic identification microchip for the dog	**2443/79(20.1)(9)(a)**
Not having a properly designed pen or outdoor holding structure	**2443/79(20.1)(9)(b)**
Not visibly posting a sign indicating there is a dangerous dog at the property	**2443/79(20.1)(9)(d)**
Any person found removing or defacing a dangerous dog sign	**2443/79(20.1)(10)**
Allowing a dangerous dog outdoors or out of its pen on private property	**2443/79(20.1)(9)(b)**
Allowing a dangerous dog off the owner's premises	**2443/79(20.1)(8)(a)**

APPENDIX 3 – ANIMAL BY-LAW OFFENSES (CONTINUED)

Dangerous Dogs (Continued)	
Allowing a dangerous dog on public property on a leash longer than six feet	**2443/79(20.1)(9)(c)**
Allowing an unleashed dangerous dog on public property	**2443/79(20.1)(9)(c)**
Allowing an unmuzzled dangerous dog on public property	**2443/79(20.1)(9)(c)**
Not informing the pound of a transfer of ownership within two days	**2443/79(20.1)(9)(e)**
Not informing the pound of the dog's death within two days	**2443/79(20.1)(9)(f)**
Not informing the pound if the dog has gotten loose	**2443/79(20.1)(9)(g)**
Not informing the pound if the dog has bitten a person or animal	**2443/79(20.1)(9)(g)**
Owning a Pit Bull (as defined in the by-law)	**2443/79(20.2)(3)**
Not informing the pound within two days if a Pit Bull has puppies	**2443/79(20.2)(5)**
Cats	
Not having identification with owner's information on the cat	**2443/79(28)(11)**
Removing a cat's identification from its body	**2443/79(28)(11)**
Allowing a cat to run at large off the owner's property	**2443/79(28)(4)**
Not having a cat on a leash in public	**2443/79(28)(4)**
Having a cat on a leash longer than six feet in public	**2443/79(28)(4)**
Allowing a cat to bite a person	**2443/79(28)(1)**
Owning an intact cat over six months old without a permit	**2443/79(28)(13)**
Owning a cat that has not been vaccinated for rabies	**2443/79(28)(17)**
Not complying with cat trap rules	**2443/79(28)(5)**
Owning more than three cats without a license or Community Committee permission	**2443/79(30)**
Animals Other Than Dogs and Cats	
Allowing any owned animal to run at large in public	**2443/79(6)(a)**
Herding any owned animals within the city limits	**2443/79(6)(b)**
Exotic Animals	
Owning an animal prohibited by the by-law, more specifically:	**3389/83(1)**
· venomous reptiles;	**3389/83(1)(1)**
· specified pythons, boas (snakes) and monitors (lizards);	**3389/83(1)(2)**
· crocodiles or members of the crocodile family;	**3389/83(1)(3)**
· monkeys or other non-human primates;	**3389/83(1)(4)**
· carnivora (other than domestic dogs, cats and ferrets) including but not limited to lions, tigers, wolves, and bears; and	**3389/83(1)(5)**
· horses, cattle, hogs, goats, sheep, poultry, and bees, except where allowed by zoning by-laws	**3389/83(1)(6)**

APPENDIX 4 - AVERAGE STAFF ON SHIFT

The following is a calculation of the average number of Animal Service Officers on duty for each shift, after considering staff leave time.

Average Staff Absent Per Shift

Vacation Days Per ASO		30	
Total ASOs	×	12	
			360
Absentee Days Per ASO		8	
Total ASOs	×	12	
			96
Statutory Holidays		12	
ASOs per Shift	×	6	
			72
Total Days Off for ASOs			528
Shifts per Year		÷	365
Average ASOs Absent Per Shift			1.4
Average ASOs On Shift			4.6

Sources: CUPE 500 Collective Agreement and
Statistics Canada (Absentee Rates)

APPENDIX 5 - AGENCY GOALS AND PERFORMANCE MEASURES

The following is a listing of performance measures that were set out according to the Agency's *Operating Charter* and the *Animal Services Business Plan* (1999). The chart outlines the years in which the measurements were reported in the Agency's annual selection report.

Goal	Measurement	Reported Before 2005	Reported After 2005
Financial Stability	• Cost savings through efficiencies realized	✓	
	• Additional program revenue generation	✓	
	• Additional license fee revenue	✓	✓
	• Net income	✓	✓
	• Grant support	✓	✓
Increased Public Awareness and Participation	• Number of calls for service	✓	
	• Number of licenses sold	✓	✓
	• Number and types of charges laid	✓	
	• Number of educational programs		
	• Number of promotional programs		
Improve Public Image	• Number of educational programs		
	• Number of promotional programs		
Improve Customer Service	• Number of outlets to purchase products		
	• Number of alternative payment processes		
	• Number of partnerships		
	• Customer feedback process		
	• Number of calls for service	✓	
	• Number of staff trained		
	• Improved complaint response systems		
	• Number of dogs reunited with their owners	✓	
Improve Health and Safety of Neighbourhoods	• Number of licenses sold		
	• Number of calls for service	✓	
	• Number of biting animals handled	✓	Cats(2009)
	• Number of unwanted animals handled	✓	
	• Number of dangerous dogs handled		
	• Number of dogs reunited with owners	✓	
	• Number of dogs impounded	✓	
	• Number of dogs euthanized	✓	
	• Number of illegal animal-based businesses		