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October 7, 2022

VIA EMAIL

Dear Commissioners:

Re: Final Submissions on behalf of the National Police Federation

1. Please accept this letter as the final submissions of the National Police Federation (“NPF”). The NPF is the sole certified bargaining agent representing Members of the RCMP below the rank of Inspector (“Members”), including more than 100 individuals who responded to the mass casualty event or participated in the investigation.
2. The Commission has invited participants’ cumulative comments on issues raised throughout its proceedings, as well as proposed recommendations for the future. The NPF continues to rely on its earlier submissions made on a weekly basis on the evidentiary record, as well as its Phase 1 and Phase 2 final submissions. The NPF’s earlier submissions set out comprehensively its position on the factual findings the Commission should draw from the evidence.
3. In these final submissions, the NPF will address seven key areas where meaningful recommendations from the Commission could “help prevent and respond to similar incidents in the future”:¹
 - i. A review of police resourcing in Nova Scotia;
 - ii. Implementation of comprehensive policing standards;
 - iii. Enhanced support for Member mental health;
 - iv. Multi-agency supports for victims and families;
 - v. An emergency air support strategy for the Atlantic region;
 - vi. Improved technology for situational awareness and interoperability; and
 - vii. Resources and best practices to support the critical incident response.

¹ Order in Council, PC 2020-822, (c) [OIC]. A summary of all of the NPF’s proposed recommendations are compiled in the table included Appendix A, for ease of reference.

4. Many of the NPF's recommendations are oriented toward ensuring its Members will be better prepared, better equipped, and safer the next time they are called upon to respond to a major critical incident. The NPF welcomes any other recommendations from the Commission which improve Members' ability to serve and protect the public.

I. REVIEW OF POLICE RESOURCING IN NOVA SCOTIA

5. The RCMP is well positioned to provide comprehensive policing services that are responsive to the unique community needs of Nova Scotians. However, RCMP services must be adequately resourced to enable Members to respond rapidly to calls for service, deal effectively with critical incidents, and engage in proactive community policing.
6. As detailed below, the NPF requests recommendations in the following four areas, relating to police resourcing:
 - a. Review of the police resourcing model and funding formula;
 - b. Cost recovery for specialized services provided to municipal forces;
 - c. Adequate resourcing for effective rural policing; and
 - d. Resourcing for critical incident preparedness.

A. Police resourcing model and funding formula in Nova Scotia requires review

7. The RCMP has served as Nova Scotia's provincial police service since 1932 under successive Provincial Police Service Agreements (PPSA) between the Province of Nova Scotia and Canada.²
8. Under the *Police Act*, municipalities are responsible for the provision and funding of police services in Nova Scotia.³ Many Nova Scotian municipalities have delegated to the Province their authority to negotiate and contract with the federal government for the provision of policing services for their municipalities, through the PPSA.⁴ The Commission heard evidence that 40 Nova Scotian municipalities, representing approximately half of the population of the province, are policed by the RCMP under the PPSA signed in 2012.⁵ Under the PPSA, the Province of Nova Scotia contributes

² "Province of Nova Scotia Provincial Police Service Agreement" [PPSA], 2012-2032, COMM0043270, Exhibit P-004651.

³ *Police Act*, SNS 2004, c 31, s. 35-36.

⁴ Testimony of Haley Crichton, Structure of Policing Roundtable, Sept. 8, 2022, COMM0064722, p. 24, lines 23-28; Mass Casualty Commission - Transcript of Interview with Haley Crichton, Jan. 24, 2022, COMM0051428, Exhibit P-001977, p. 10.

⁵ Testimony of Haley Crichton, Structure of Policing Roundtable, COMM0064722, p. 24, lines 23-28;

70% of policing costs and the federal government contributes 30%.⁶ The Province in turn recovers from municipalities its share of the costs of the policing services that municipalities receive under the PPSA.⁷

9. The funding formula or billing model used by the Province to recover the cost of policing services from municipalities has been referred to as a “per officer” cost recovery model. Haley Crichton, Executive Director of Public Safety and Security for the Province, explained the “per officer” model during the Commission’s Structure of Policing Roundtable. Under this model, the totality of all policing costs (whether from fuel, vehicles, equipment, salaries, benefits, shared services, records management, facilities, and other sources) is divided by the total number of police officers. The costs recovered by the Province from each municipality is equal to the “per officer” amount multiplied by the number of police officers servicing that municipality.⁸
10. The NPF submits that the “per officer” funding formula has significant limitations and must be reconsidered. One perverse effect of this model is that the only way for municipalities to realize cost efficiencies in their delivery of policing services is by reducing the number of police officers serving their area. Municipalities are unable to target specific budget lines to identify other sources of potential savings. Yet reductions in police staffing levels in rural detachments create risks for both officer and public safety.⁹
11. The “per officer” funding formula adopted by Nova Scotia directly influences how municipalities determine their authorized police strength. In the absence of minimum standards for police complements based on factors such as crime trends, population, geographic distances, community policing needs, and critical incident preparedness, the cost per officer becomes the determining factor for many municipalities in assessing police staffing levels. D/Comm Brian Brennan explained this as follows in his interview with Commission investigators:

B. MacKnight, “The Structure of Policing in Nova Scotia in April 2020”, Nov. 30, 2021, COMM0040450, P-000001, p. 12.

⁶ “Provincial Police Service Agreement”, COMM0043270, Exhibit P-004651; B. MacKnight, “The Structure of Policing in Nova Scotia in April 2020”, COMM0040450, P-000001, p. 12.

⁷ Testimony of Haley Crichton, Structure of Policing Roundtable, COMM0064722, p. 24.

⁸ Testimony of Haley Crichton, Structure of Policing Roundtable, COMM0064722, p. 24-25.

⁹ Testimony of Haley Crichton, Structure of Policing Roundtable, COMM0064722, p. 25; Testimony of Danielle Desjardins, Participant Consultations: Police-Related Organizations, September 1, 2022, COMM0064440, p. 71, lines 18-24. See, for example, the Town of Oxford’s request to reduce its police complement for financial reasons in 2016: COMM0064794 [not yet exhibited].

[T]he Government of Nova Scotia has service exchange with the municipalities, and they broker the ... the cost of policing directly with the municipalities as opposed to the Province setting ... setting the standard for resourcing and for funding for ... for policing in the province. ... [I]t's up to the municipalities in Nova Scotia to ... broker, I guess, or negotiate with the Province, and that here's how many police officers we can afford, and the Province says, "Okay, this is how much it costs you." ...

So in other Divisions, it would be that the ... that the Province would have more say into how many police officers should be deployed in a geographical populated area based on crime trends. In Nova Scotia, that doesn't happen. The municipalities decide how much they're willing to spend on policing, the Province sets a rate per police officer. ...¹⁰

12. The "per officer" funding formula also creates the potential for significant disparities in police service delivery between geographical regions in the province, based not on need but on the "ability to pay" of a particular municipality.¹¹
13. The model presents a barrier to cooperative operational coverage in the event of vacancies arising, for example, due to medical or parental leaves of police officers. Ms. Crichton explained that neighbouring municipalities have resisted deploying Members servicing their municipality to other municipalities to ensure coverage in such circumstances, because they pay the Province for a certain number of officers.¹² The inability to flexibly backfill for Members' leaves also negatively impacts Members' mental health, as explained further below.
14. Both Ms. Crichton and D/Comm. Brennan noted that many other jurisdictions have not adopted the "per officer" funding formula currently used in Nova Scotia.¹³
15. The NPF submits that an evidence-based police resourcing model and more flexible funding formula would better assess policing levels and ensure communities in Nova Scotia receive effective policing services.

¹⁰ Mass Casualty Commission – Transcript of Interview with D/Commr Brian Brennan, COMM0063046, Exhibit P-004223, p. 123-24; Testimony of Ret. A/Commr Lee Bergerman, Aug. 22, 2022, COMM0063188, p. 71-72.

¹¹ E.g., Testimony of Steve Graham, Participant Consultations: Police-Related Organizations, September 1, 2022, COMM0064440, p. 68-69. RCMP H Division Response to June 2, 2022 Subpoena for Written Evidence, June 2, 2022, COMM0059949, Exhibit P-003952, p. 24-25.

¹² Testimony of Haley Crichton, Structure of Policing Roundtable, COMM0064722, p. 26, lines 24-28. See also RCMP H Division Response to June 2, 2022 Subpoena, COMM0059949, Exhibit P-003952, p. 11.

¹³ Testimony of Haley Crichton, Structure of Policing Roundtable, COMM0064722, p. 25, line 13-15.

The NPF requests that the Commission recommend that the Province of Nova Scotia discontinue the use of the “per officer” funding formula as a basis for cost recovery from municipalities policed by the RCMP under the PPSA, and conduct a review of its police resourcing models and funding formula, to allow for the identification and maintenance of an effective level of police personnel and resources in Nova Scotia.

B. Cost-Recovery for Specialized Service Exchange

16. Many municipal police agencies in Nova Scotia do not employ officers in specialized service functions, such as forensic identification, police dog services, major crime investigators, and emergency response teams, or maintain equipment such as air assets or tactical armoured vehicles. Those smaller police agencies have come to rely “significantly” on the RCMP to provide those services.¹⁴
17. Historically, the RCMP has provided specialized services to municipal agencies at no cost on an informal basis, absorbing that cost into its budget under the PPSA. However, the PPSA does not require the RCMP to provide specialized support services to municipalities with municipal police agencies, which do not pay for RCMP services.¹⁵ In effect, those municipalities which contract for RCMP services end up paying for the specialized services that are received by municipal police agencies, because it is built into their per officer cost. In other words, when ERT is deployed to Truro, you could say that Windsor pays for it.
18. Additional stress on already-limited resources impacts NPF Members as well, both by overtasking specialists and draining resources from general duty policing. Where the cost of policing is a barrier to adequate staffing levels, officer health and safety is compromised as the RCMP is forced to “risk it out” at NPF Members’ expense.
19. Specialized support services must be properly resourced to ensure adequate, effective, and equitable service delivery and costing.¹⁶ Municipalities with their own municipal police agencies must formalize agreements for the delivery of specialized services, whether from the RCMP or other municipal police agencies, on a cost-recovery basis.

¹⁴ Interview with Haley Crichton, COMM0051428, Exhibit P-001977, p. 12.

¹⁵ Interview with Haley Crichton, COMM0051428, Exhibit P-001977, p. 12.

¹⁶ Affidavit and supporting materials of Pharanae Croisetiere, Aug. 11, 2022, COMM0062461, Exhibit P-004158, p. 90.; Testimony of Insp. Don Moser, Participant Consultations: Police-Related Organizations, Sept. 1, 2022, COMM0064440, p. 91.

The NPF requests that the Commission recommend that the Province, RCMP and municipal police services enter into formal cost-recovery agreements with respect to the provision of specialized services outside of RCMP contract jurisdiction.

C. Resourcing for effective rural and community policing

20. The Commission has heard evidence that rural police services are not adequately resourced in Nova Scotia, creating risks for officer and public safety, and allowing insufficient time for proactive community policing initiatives.
21. Rural police services typically consist of relatively small teams, often based out of one station or detachment, that are responsible for vast, sparsely populated areas.¹⁷ Though rural police services require more personnel than urban services,¹⁸ rural areas receive fewer resources and are often understaffed.¹⁹ In some municipalities, staffing levels do not allow for 24-hour on-duty coverage.²⁰
22. Evidence before the Commission concerning the mass casualty illustrates this broader trend. At the time of the mass casualty, RCMP detachments regularly operated at the minimum complement,²¹ due in part to a lack of “buffer” to account for expected and unexpected vacancies.²² Bible Hill detachment was operating with only four general duty Members on April 18, 2020 – two Members short of a full complement of six – including a constable in an acting NCO role.²³

¹⁷ A. Souhami, “A Systematic Review of the Research on Rural Policing” (“Systematic Review”), May 2022, COMM0058282, Exhibit P-002634, p. 18.

¹⁸ R. Ruddell and C. O’Connor, “What do the Rural Folks Think? Perceptions of Police Performance” (“What do the Rural Folks Think?”), *Policing*, 16:1, 2021, COMM0059288, Exhibit P-003178, p. 118.

¹⁹ A. Souhami, “Systematic Review”, COMM0058282, Exhibit P-002634, p. 10-11.

²⁰ B. MacKnight, “The Structure of Policing in Nova Scotia in April 2020”, COMM0040450, Exhibit P-000001, p. 18-19; “Colchester District Policing Review”, Sept. 15, 2020, COMM0043278, Exhibit P-003278, p. 36-37.

²¹ Testimony of Sgt. Andy O’Brien, May 31, 2022, COMM0058858, p. 9, line 21 to p. 10, line 12; Testimony of C/Supt Darren Campbell, July 26, 2022, COMM0061291, p. 111-12; Testimony of Steve Graham, Participant Consultations: Police-Related Organizations, Sept. 1, 2022, COMM0064440, p. 67, lines 20-28.

²² Testimony of C/Supt Campbell, COMM0061291, p. 112, lines 23-26; Testimony of C/Supt. Chris Leather, July 27, 2022, COMM0061294, p. 103, lines 26-28.

²³ Testimony of IARD Witness Panel, March 28, 2022, COMM0053615, p.11, lines 25-28.

23. Police staffing levels in rural areas must account for the vast distances rural officers must travel to respond to calls,²⁴ as well as other obstacles such as poor road conditions, changing weather systems, and darkness in the rural countryside.²⁵ The four Bible Hill Members who were on duty on the night of April 18, 2020, served an area of 3,600 square kms,²⁶ described as an extremely busy detachment area,²⁷ sometimes requiring hours of driving from one end of the county to respond to a call at the other end.²⁸
24. Staffing levels in rural detachments should allow for Members to respond to high-risk calls for service and other dangerous situations in pairs, including calls for service where the presence of a firearm is likely. In rural areas, gun ownership and illegal firearms are prevalent,²⁹ and backup from a Member in another vehicle may be a significant distance away. Existing staffing levels in detachments do not allow officers to patrol and respond to calls for service with a partner at all times,³⁰ which poses inherent risks.³¹ As the NPF has highlighted in earlier submissions, evidence before the Commission offers numerous examples of Members who were limited in their response to the mass casualty, or made more vulnerable and less safe, by the fact that they were traveling or working alone.³²
25. When detachments are understaffed, police officers do not have adequate time to engage in proactive community policing.³³ The Commission has heard evidence that current staffing levels in Nova Scotia do not allow Members to engage regularly in the

²⁴ R. Ruddell and C. O'Connor, "What do the Rural Folks Think?", COMM0059288, Exhibit P-003178, p. 107 and 117. See also B. MacKnight, "The Structure of Policing in Nova Scotia in April 2020", COMM0040450, Ex. P-000001, p. 19.

²⁵ A. Souhami, "Systematic Review", COMM0058282, Exhibit P-002634, p. 22-23.

²⁶ *First Responder Actions in Portapique*, COMM0050894, Exhibit P-000005, para 39.

²⁷ Testimony of Sgt. O'Brien, COMM0058858, p. 8, lines 8-20.

²⁸ Testimony of IARD Witness Panel, COMM0053615, p. 18-19; p. 24, lines 17-23.

²⁹ R. Ricciardelli, "'Risk It Out, Risk It Out': Occupational and Organizational Stresses in Rural Policing" ("Risk It Out, Risk It Out"), *Police Quarterly*, 2018, COMM0059287, Exhibit P-002641, p. 425; D. Doherty and J. Hornosty, "Exploring the Links: Firearms, Family Violence and Animal Abuse in Rural Communities" ("Exploring the Links"), May 2008, COMM0059735, Exhibit P-003682, p. viii and 47.

³⁰ Testimony of C/Supt. Chris Leather, July 28, 2022, COMM0061295, p. 121-23.

³¹ R. Ricciardelli, "Risk It Out, Risk It Out", COMM0059287, Exhibit P-002641, p. 426-427.

³² NPF Final Phase 1 Submissions, p. 13; NPF Weekly Submissions on "Highway 4, Glenholme", para 9, and "Portapique: April 18-19, 2020", para 37. The MacNeil Report, regarding the shootings of RCMP Members in Moncton, New Brunswick in June 2014, noted that Members who were deployed on perimeter duty in groups operated as a deterrent and were less likely to be fired upon: MacNeil Report, Dec. 1, 2014, COMM0050842, Exhibit P-001628, p. 87.

³³ Testimony of Dr. Rosemary Ricciardelli, Roundtable: Rural Communities, Policing and Crime, June 30, 2022, COMM0059605, p. 99.

proactive community policing activities that would allow them to deepen their relationships with and knowledge of the communities they serve.³⁴

26. Resourcing of rural detachments must be sufficient to allow Members to allocate time to proactive and community policing activities. Research shows that relationships between police and community members, based on public confidence, are essential to effective crime prevention,³⁵ and that police effectiveness is “contingent on community support and solidarity”, which can only be developed by police spending “considerable time” in those communities.³⁶
27. In addition to recommendations for more appropriate police resourcing, the NPF supports the civilianization of police functions to reduce administrative burden on Members.³⁷ The Commission should also consider de-tasking police officers from responding to calls which can more appropriately be addressed by adequately resourced social services, including mental health services.³⁸
28. Community organizations must be engaged in primary and secondary crime prevention strategies. The NPF also supports recommendations by the Commission for increased funding and focus on community initiatives in rural areas that are aimed at improving the social determinants of health and thereby preventing crime.³⁹

³⁴ Testimony of Hubert Martin, Roundtable: Contemporary Community Policing, Community Safety and Well-Being, Sept. 7, 2022, COMM0064721, p. 112-13.

³⁵ K. Foster, “Crime Prevention & Community Safety in Rural Communities” (“Crime Prevention”), April 2022, COMM0053824, Ex. P-002633, p. 37.

³⁶ K. Foster, “Crime Prevention”, COMM0053824, Ex. P-002633, p. 37.

³⁷ “Community-Engaged Rural Policing: The Case for Reform and Innovation In Rural RCMP Policing”, COM0063515, Exhibit P-004635, p. 37-38

³⁸ The NPF’s detailed position on this issue is canvassed in the report: “Defunding the Police – Defining the way forward for HRM”, COMM0058412, Exhibit P-001908, p. 61-18.

³⁹ “Rural Crime Prevention”, *Canadian Municipal Network on Crime Prevention*, 2020, COMM0063575, Ex. P-004819, p. 9, 13.

The NPF requests that the Commission recommend that the Province of Nova Scotia identify and support municipalities to maintain a minimum police strength in Nova Scotia that:

- a. Is effective for Nova Scotia's current population;
- b. Maintains 24-hour service coverage across the province;
- c. Permits Members to respond rapidly to calls for service, with consideration for the vast geographic areas of rural Nova Scotia, road conditions, weather systems, and other obstacles;
- d. Is informed not only by trends in crime reporting, but also by other community needs and expectations;
- e. Enables Members to respond with a partner in dangerous situations, in calls for service where the presence of firearms is likely, and for other tasks requiring both communication and security roles (e.g., containment);
- f. Allows for proactive policing assignments that enable personnel to engage in consistent community policing activities and establish and maintain situated local knowledge; and
- g. Factors in "worst case scenario" and critical incident planning and preparedness.

D. Resourcing for critical incident preparedness

29. Police resourcing must also allow for an effective response to critical incidents and other "worst-case scenarios".⁴⁰
30. The Commission has heard extensive evidence that inadequate staffing of specialist services in "H" Division, including the Emergency Response Team (ERT), Emergency Medical Response Team (EMRT), and Police Dog Services, posed challenges for the critical incident response on April 18-19, 2020.
31. At the time of the mass casualty, the RCMP ERT was operating at staffing levels well below the recommended complement of 18 full-time Members.⁴¹ With only five full-

⁴⁰ Testimony of Insp. Don Moser, Participant Consultations: Police-Related Organizations, Sept. 1, 2022, COMM0064440, p. 81, lines 12-21.

⁴¹ Testimony of S/Sgt. Jeff West, May 18, 2022, COMM0058603, p. 81, lines 16-24.

time and eight part-time Members available to respond,⁴² Critical Incident Commander (“CIC”) S/Sgt. Jeff West and ERT Team Leader Cpl. Tim Mills decided that Cpl. Mills would deploy with the team into Portapique, rather than be stationed at the Command Post as Tactical Operations Officer, which would have improved information-sharing and collaborative decision-making within the command post.⁴³

32. Moreover, because “H” Division had only 13 available ERT Members, enough to staff one operational team, the RCMP had to call in support from “J” Division (New Brunswick) to act as a relief team on April 19, 2020.⁴⁴ C/Supt. Darren Campbell testified that “H” Division would need between 24 and 36 full-time ERT Members in order to have a relief team to respond to protracted critical incidents, in addition to an initial responding team.⁴⁵ By contrast, the Commission heard evidence that Halifax Regional Police have stable funding for an ERT complement of 28 Members, serving only the urban core of the Halifax Regional Municipality.⁴⁶
33. Although improvements have been made to the staffing of “H” Division ERT since the mass casualty, the evidence before the Commission is that ERT has only 12 full-time Members presently, with a target of 18 full-time positions by 2024-25.⁴⁷
34. EMRT positions, staffed entirely on a part-time basis, also were not fully filled on April 18-19, 2020. As a result, only two EMRT Members were available to respond to the initial call, and a third member was kept on standby for relief in case the event extended beyond the capacity of the first team.⁴⁸ The Member who acted as EMRT coordinator did so in addition to his regular full-time position as a detachment team supervisor on general duty.⁴⁹
35. Finally, the Commission heard evidence that, at the time of the mass casualty, only two Police Dog Services Members covered the entirety of Nova Scotia, on an on call basis. Cpl. Dion Sutton explained that one dog handler was responsible for responding to calls in the “north” and one in the “south”.⁵⁰ The lack of available relief during the mass casualty event meant that PDS Members were overworked and their physical and

⁴² *RCMP Emergency Response Team (ERT)*, May 13, 2022, COMM0057766, Exhibit P-001370, para 34.

⁴³ Testimony of S/Sgt. West, COMM0058603, p. 84, lines 12-15; Testimony of S/Sgt. Kevin Surette, May 18, 2022, COMM0058603, p. 85, lines 6-13.

⁴⁴ *RCMP Emergency Response Team (ERT)*, COMM0057766, P-001370, para 8.

⁴⁵ Testimony of C/Supt. Campbell, COMM0061291, p. 16, 123-24.

⁴⁶ Testimony of Chief Dan Kinsella, Aug. 25, 2022, COMM0058878, p. 69, lines 25-27.

⁴⁷ Affidavit and supporting materials of Pharanae Croistiere, COMM0062461, Exhibit P-004158, p. 86.

⁴⁸ *RCMP Emergency Response Team (ERT)*, COMM0057766, P-001370, para 43.

⁴⁹ Testimony of Cpl. Duane Ivany, May 5, 2022, COMM0057389, p. 148, lines 18-26.

⁵⁰ Mass Casualty Commission - Transcript of Interview with Cpl. Dion Sutton, Dec. 16, 2021, COMM0043471, Exhibit P-000186, p. 7.

mental health were neglected during the event and investigative searches that followed.⁵¹ Since the mass casualty, the Province of Nova Scotia has approved two additional police dog handler teams in Chester and Enfield; however, one of those positions is “pressure funded” by redistributing RCMP resources from other service delivery areas.⁵²

36. Staffing specialist services to the bare minimum level will not prepare Nova Scotia for the next critical incident. Proper resource planning cannot assume that all Members in a detachment or specialist teams will be immediately available – much less sufficient – to respond in the event of a major occurrence such as a mass shooting.⁵³ Resourcing must consider the need for relief teams in the event of a prolonged critical incident such as that which occurred on April 18-19, 2020, and account for regular absences due to illness, training, vacation and special leaves.

The NPF requests that the Commission recommend that the Province of Nova Scotia and RCMP immediately provide permanent stable funding for, and staff in “H” Division:

- a. 24 full-time ERT Members;
- b. One full-time EMRT Member in a coordinator and operational role; and
- c. Four full-time Police Dog Services positions.

II. IMPLEMENTATION OF COMPREHENSIVE PROVINCIAL POLICING STANDARDS

37. The Province of Nova Scotia, in consultation with the RCMP and municipal police agencies, must establish modernized, comprehensive provincial policing standards binding on all police agencies in Nova Scotia.
38. These standards should inform the minimum levels of police service delivery applicable to any community in the province, such that all Nova Scotians are able to access the same level of police services no matter where they live. These standards must address not only general duty policing, but also the specialized police services necessary to mount a comprehensive critical incident response.

⁵¹ Interview with Cpl. Sutton, COMM0043471, Exhibit P-000186, p. 22.

⁵² Affidavit and supporting materials of Pharanae Croistiere, COMM0062461, Exhibit P-004158, p. 86-87; See Testimony of C/Supt. Darren Campbell, July 25, 2022, COMM0061287, p. 36, lines 5-10.

⁵³ Testimony of Insp. Don Moser, Participant Consultations: Police-Related Organizations, COMM0064440, p. 81, lines 24-28.

A. Policing standards to ensure minimum service delivery to all Nova Scotians

39. Provincial policing standards establish the base minimum requirements that all police agencies must meet in order to operate in the province.⁵⁴ A number of Canadian provinces, including Alberta, British Columbia, Ontario, and Quebec, have adopted binding provincial policing standards which are regularly updated.
40. The Commission has heard evidence that the policing standards currently in effect in Nova Scotia are outdated, weak, and vague.⁵⁵ As described by Insp. Sean Auld during the Commission's participant consultations, "If those standards were reviewed, I suspect by an arm's length agency, I'm not sure they would meet the threshold of a standard."⁵⁶
41. A working group and steering committee established by the Nova Scotia Department of Justice with representation from the RCMP, municipal police agencies, police boards and subject-matter experts, is currently developing modern policing standards for Nova Scotia.⁵⁷ The Commission should recommend a process for the adoption and enforcement of these standards for minimum police service delivery in the province.
42. Provincial policing standards are necessary to ensure that all Nova Scotians benefit from the same level and quality of police service. The Commission has heard evidence that, currently, there is disparity in police service delivery across Nova Scotia.⁵⁸
43. Provincial policing standards will also enhance interoperability between police agencies. The evidence shows that fragmented policing models create significant challenges for interoperability, when members of different police agencies do not have the same type or level of training, equipment, technology, or protocols.⁵⁹ Provincial policing standards have been described as the "building block that will allow greater interoperability", by ensuring that police officers across the province receive the same training and equipment, for example.⁶⁰

⁵⁴ Testimony of Haley Crichton, Roundtable: Structure of Policing in Nova Scotia, COMM0064722, p. 8, lines 1-3, lines 18-20.

⁵⁵ E.g., Testimony of C/Supt. Leather, COMM0061294, p. 111, line 1.

⁵⁶ Testimony of Insp. Sean Auld, Participant Consultations: Police-Related Organizations, COMM0064440, p. 54, lines 10-11.

⁵⁷ Testimony of C/Supt. Leather, COMM0061294, p. 97, lines 11-15.; Interview with Haley Crichton, COMM0051428, Exhibit P-001977, p. 28-29.

⁵⁸ Testimony of C/Supt. Leather, COMM0061294, p. 99, lines 3-11.

⁵⁹ Testimony of B. Carter, Participant Consultations: Police-Related Organizations, COMM0064440, p. 52-53.

⁶⁰ Testimony of Insp. Auld, Participant Consultations: Police-Related Organizations, COMM0064440, p. 54; Testimony of Haley Crichton, Roundtable: Interoperability, COMM0059341, p. 42, line 21 to p. 43, line 6.

The NPF requests that the Commission recommend that the Province of Nova Scotia adopt comprehensive, modern, and substantive provincial standards across all areas of police service delivery, including training, equipment, technology, specialized services, records management, administration, and operations, as developed by the provincial working group.

B. Policing standards to ensure equitable provision of specialized services

44. Not all police agencies in Nova Scotia are able to maintain all components of a critical incident package, such as critical incident commanders, emergency response teams, emergency medical response teams, police dog handlers, crisis negotiators, tactical armoured vehicles, and FLIR-enabled air support, or specialized investigative services such as forensic identification specialists and major crime investigators.
45. Smaller agencies who do not have their own specialized services should be required to ensure that formal access to such resources is in place, in order to meet minimum policing standards.⁶¹

The NPF requests that the Commission recommend that the Province enforce minimum levels of service delivery by requiring all agencies to have formal agreements for the provision of all necessary specialized services that they do not offer.

C. Evidence-based training and policy development

46. Nova Scotia's existing training standards do not reflect current training needs, or provide clear guidance to ensure consistent training across police services. The only substantive training requirement mandated by the Province, at this time, relates to use of force.⁶² Modern and formalized training standards will ensure that all police officers in Nova Scotia acquire and maintain necessary qualifications across the full spectrum of police functions and services, including critical incident response and specialty investigative areas.⁶³ Training standards should specify what training and certification is required for particular positions (e.g., critical incident commanders, police dog

⁶¹ Testimony of Haley Crichton, Roundtable: Structure of Policing, COMM0064722, p 19, lines 6-12.

⁶² Interview with Haley Crichton, COMM0051428, Exhibit P-001977, p. 50.

⁶³ Testimony of Haley Crichton, Participant Consultations: Police-Related Organizations, COMM0064440, p. 33, lines 24-27.

handlers, specialized investigators), as well as the necessary repetitions to ensure that perishable skills are maintained.⁶⁴

47. The mass casualty event has highlighted gaps and potential areas of improvement in training for RCMP Members, or for RCMP policy. The unprecedented nature of the perpetrator's crimes was outside what police had trained for, including IARD in a dark, wooded and rural environment, and stopping a mobile active shooter in a vehicle. The NPF welcomes recommendations that reflect ongoing learning from this incident and in police science, with respect to general duty, critical incident response, and specialized investigative training for its Members, or for changes to RCMP operational policy which will improve officer safety and public safety. As noted in earlier submissions, adequate resourcing is a key prerequisite to make training meaningful and effective.⁶⁵

The NPF requests that the Commission recommend that provincial policing standards, including training standards, be reviewed regularly, and no less than every three years, to ensure they continue to meet legal requirements and best practices based on learning in police science, and expectations for adequate, consistent police service delivery and interoperability.

D. Policing standards for governance and accountability

48. Finally, policing standards promote the effective governance of police agencies by enabling accountability to the Province through auditing and monitoring.⁶⁶ The Commission has heard persuasive evidence that policing audits are not meaningful without clear standards against which to measure performance, both within and as between agencies.⁶⁷

The NPF requests that the Commission recommend that the Province of Nova Scotia conduct audits and evaluations of all police services based on provincial standards.

⁶⁴ Testimony of Insp. Auld, Participant Consultations: Police-Related Organizations, COMM0064440, p. 56, lines 27-28.

⁶⁵ Testimony of Pat Bouchard, Participant Consultations: Police-Related Organizations, COMM0064440, p. 33, lines 15-18; Testimony of T. Brown, Roundtable: Interoperability, COMM0059341, p. 46, lines 4-7, 17-19.

⁶⁶ Testimony of Haley Crichton, Participant Consultations: Police-Related Organizations, COMM0064440, p. 60, lines 25-27. See also "Independent Review of the Manitoba Police Services Act (2020)", Mass Casualty Commission Environmental Scan, COMM0063226, Exhibit P-004461, p. 125.

⁶⁷ Testimony of C/Supt. Leather, COMM0061294, p. 108, lines 3-5; p. 109, lines 1-2; p. 110-12.

III. ENHANCED SUPPORT FOR MEMBER MENTAL HEALTH

49. The Commission should make recommendations which focus on preventing post-traumatic stress injuries and improving mental health outcomes for all police officers, including in response to critical incidents. The NPF seeks recommendations which apply to the RCMP and its Members. However, it supports any recommendation which would improve mental health supports and outcomes for all first responders.
50. First responders, including police officers, are exposed to hundreds or thousands of potentially psychologically traumatic events (“PPTTE”) over the course of their careers.⁶⁸ This cumulative trauma results in a significant risk for mental disorders, and higher prevalence of mental disorders than in the general population,⁶⁹ including operational stress injuries (“OSI”).⁷⁰ Members are also susceptible to burnout, based on both operational and organizational risk factors.⁷¹
51. The mass casualty event was a significant trauma that had a negative impact on the mental health of a majority of involved Members. More than 200 “H” Division Members responded to Member Wellness Survey conducted by NPF in order to inform the Commission of the impact of this experience on their mental health, and allow Members to provide their feedback on an aggregated and anonymous basis.⁷² NPF Members provided vulnerable and thoughtful responses to difficult questions. The NPF respectfully requests that the Commission review carefully the detailed responses provided by Members, which cannot be summarized or captured in these submissions.
52. The Commission also heard helpful expert evidence which framed available mental health supports in terms of primary, secondary and tertiary interventions.⁷³ The Commission’s recommendations should address improvements to police mental health

⁶⁸ J. Price et al, “Assessing the Perceptions and Impact of Critical Incident Stress Management” (“Critical Incident Stress Management”), *International Journal of Environmental Research and Public Health*, April 20, 2022, COMM0059230, Exhibit P-003166, p 1.

⁶⁹ R. Carleton et al, “Mental Disorder Symptoms among Public Safety Personnel in Canada”, *Canadian Journal of Psychiatry*, August 28, 2017, COMM0059239, Exhibit P-003152, p. 9.

⁷⁰ A. Stelnicki, L. Jamshidi, A. Fletcher, and R. Carleton, “Evaluation of Before Operational Stress - A Program to Support Mental Health and Proactive Psychological Protection in Public ” (“Evaluation of Before Operational Stress”), *Frontiers in Psychology*, August 17, 2021, COMM0059233, Exhibit P-003142, p 2

⁷¹ C. Burns and M. Buchanan, “Factors that influence the decision to seek help in a police population” (“Factors that influence the decision to seek help”), *International Journal of Environmental Research and Public Health*, September 2020, COMM0059235, Exhibit P-003155, p 3.

⁷² *National Police Federation, Member Wellness Survey*, COMM0064754 and *National Police Federation, NS MCC Member Mental Health Survey*, COMM0064755.

⁷³ Testimony of Dr. Julie MacMillan-Devlin and Dr. Deborah Norris, June 30, 2022, COMM0059605 p 25 line 22 to p 27 line 9.

at all three levels, not only after a critical incident but at all stages of a Member's career. Mental health recommendations should cover the following three core areas:

- a. Address organizational barriers to mental wellness;
- b. Improve post-critical incident supports beyond debriefings; and
- c. Provide supports for RCMP spouses and families.

A. Address organizational barriers to mental wellness

53. Members who are exposed to PPTEs while on duty face organizational barriers to maintaining wellness. The record before the Commission illustrates several types of organizational barriers, including inflexible policy, resource limitations, and police culture.
 - i. *Inflexible policy as an organizational barrier to mental wellness*
54. The NPF seeks recommendations for improved mental health supports which allow for creative and diverse methods of supporting mental health following a critical incident. Not every Member will benefit from the same supports, and police organizations should be required to offer a range of supports that recognize individual differences.
55. The experience of the "H" Division ERT in attempting to organize post-event peer support within their team is an example before the Commission of resistance within the RCMP to a meaningful commitment to wellness from a policy/administrative standpoint, and at a cultural level.⁷⁴ Part-time ERT Members sought the ability to be assigned to temporary full-time ERT duties in order to promote peer supports that reflected the needs of their whole team. Their requested accommodation was refused, however, on the basis that it was not deemed medically necessary, because the Members remained fit for general duty.
56. This incident illustrates that the RCMP has taken a narrow view of its obligations to provide post-event support, and does not understand the need for flexibility in providing support, including to its specialized teams. As a consequence, Members were feeling that their organization did not support them after the mass casualty event.
57. Members should have access to early intervention with protective or supportive measures after a potentially psychologically traumatic exposure, without first needing to establish that they are unfit to work. Results from the NPF Member Wellness Survey

⁷⁴ "Fwd: RE: H Div ERT - Mental Health Support", April 27, 2020, COMM0017459, Exhibit P-002891; "RE: Fwd: Message to Div. Mental Health Champion - H Div. Critical", April 27, 2020, COMM0017460, Exhibit P-002892.

indicated that 75% of those directly involved Members who reported experiencing a notable negative impact on their mental health did not take medical leave from work to recover.⁷⁵

58. Though the MacNeil Report endorsed a 14-day administrative leave for all involved employees in the Codiak detachment, which allowed Members to complete notes, participate in critical incident debriefings, attend counseling, or spend time with family or colleagues,⁷⁶ no such grace period was extended to involved Members after the mass casualty event.

ii. Resource limitations as an organizational barrier to mental health

59. Resource limitations pose another organizational barrier to mental health. Respondents to the NPF Member Wellness Survey indicated that they were not able to take time off work because their roles were essential, or because they felt they could not leave their teams short-staffed.⁷⁷ Others indicated that they were either forced back to work or off duty sick after the events and felt the pressure of operational shortages.⁷⁸ A significant group of Members (6%) indicated that they retired earlier than planned, due to mental health challenges.⁷⁹
60. The need for adequate staffing to support mental health was recognized in the 2019 Report of the Expert Panel on Police Officer Deaths by Suicide, which addressed directly the relationship between an “authorized strength” model of police staffing which is “built on the premise that all the police positions are filled and all members are at work” and occupational stress. The Expert Panel found that this model requires police officers to “subsidize the shortfall in the authorized strength” by increasing their own workload. This contributes to burnout, and further stigmatizes members who take medical leave to address mental health issues. As explained in the Report:⁸⁰

Under the current model, staffing gaps contribute to an ongoing systemic deterrent to disclosure of mental health issues, create a significant barrier to those who need to access and maintain proper care paths, and uphold a false expectation of fit-for-duty capacity that perpetuates stigma and self-stigma surrounding mental health and occupational stress injuries. The realities of

⁷⁵ National Police Federation, Member Wellness Survey, COMM0064754, p 3.

⁷⁶ MacNeil Report, April 24, 2019, COMM0050843, Exhibit P-001629, s 12

⁷⁷ National Police Federation, Member Wellness Survey, COMM0064754, p 3.

⁷⁸ National Police Federation, NS MCC Member Mental Health Survey, COMM0064755, p 22-23

⁷⁹ National Police Federation, NS MCC Member Mental Health Survey, COMM0064755, p 22.

⁸⁰ “Staying Visible, Staying Connected - Report of the Expert Panel on Police Officer Deaths by Suicide”, September 2019, COMM0059246, Exhibit P-002632, p 14-15.

staffing gaps must be confronted.

iii. Police culture and stigma as barriers to mental health

61. Finally, aspects of police culture continue to pose a barrier to accessing mental health supports. This includes stigma from the organization or colleagues, self-stigma, and discriminatory attitudes towards first responder mental health prevalent in media and society.
62. Expert evidence before the Commission has identified cultural barriers within policing agencies which prevent the identification and treatment of operational stress injuries. As explained by Stelnicki et al:⁸¹

PSP culture can be influenced by mental health stigma, stoicism, and avoidant coping strategies, all of which can confound self-awareness of OSI symptoms and negatively impact help-seeking behaviours. OSIs are often not recognized until the impacts on the PSP are significant (e.g., marital strain, interpersonal problems with coworkers, problematic substance abuse). Asking for help can be considered a sign of weakness among PSP and may be accompanied by fears of potential consequences (e.g., being taken off the job, limits for promotions or transfers, loss of professional identity). Occupational stressors include both operational stressors (e.g. PPTe exposures, shift work, job-related risk of injury) and organizational stressors (e.g. perceived lack of support, inconsistent leadership, lack of resources).

63. The NPF submits that additional mental health training is necessary to meaningfully shift our collective understanding of first responder trauma.
64. Research has indicated that awareness and understanding of the potential psychological impacts of police work is a protective factor for Member mental health. As explained by Burns and Buchanan:⁸²

Those who had greater awareness were more likely to employ proactive strategies and seek psychological interventions, while those with little understanding or support were more likely to perceive their reaction as a form of weakness, internalize and isolate themselves – some electing to cope instead with increased alcohol consumption and other unhealthy coping strategies...

⁸¹ A. Stelnicki, L. Jamshidi, A. Fletcher, and R. Carleton, "Evaluation of Before Operational Stress", COMM0059233, Exhibit P-003142, p. 2 (internal references omitted)

⁸² C. Burns and M. Buchanan, "Factors that influence the decision to seek help", COMM0059235, Exhibit P-003155, p. 20-21.

65. The RCMP currently offers Members the “Road to Mental Readiness” (R2MR) training. Expert evidence before the Commission indicates that the impact of this single session intervention on mental health symptoms, resilience and work engagement is “small but insignificant,” with only a “small but significant” effect in reducing stigma.⁸³ Mental health training should not be merely a box to check. Members deserve evidence-based training which can be shown to be demonstrably impactful on their mental wellness.
66. More robust mental health training programs that promote help-seeking and resilience – not just in a single module, but through group “training programs that involve longer interactions with participants and opportunities to integrate learned concepts into occupational activities” – are likely to be more effective.⁸⁴ To augment currently available mental health training, the Commission should recommend the adoption of programs such as the Before Operational Stress (BOS) program developed by Dr. Megan McElheran.⁸⁵
67. The NPF requests that such enhanced training be provided, in particular, to supervisors. Supervisors have significant influence over whether Members are supported, and over the immediate operational environment or culture in which Members will experience potentially psychologically traumatic events. In one study that is before the Commission, researchers found that the behaviour of supervisors could be a determinative factor in whether Members accessed necessary psychological supports:⁸⁶

Supervisors and senior officers provided role modelling for junior members about how to deal with emotional and potentially traumatizing incidents. Participants who had supervisors who were genuine and proactive in their response to major incidents, checking in with them, normalizing reactions, arranging [Critical Incident Stress Debriefings] and encouraging them to seek psychological assistance when thought appropriate, were more likely to develop a similar framework from which to respond to subsequent traumatic events. This template later influenced their actions when they became supervisors themselves. Those with unsupportive, uninvolved, or uninformed supervisors were more likely to experience difficulty and embarrassment

⁸³ R. Carleton et al, “Mental health training, attitudes toward support, and screening positive for mental disorders”, *Cognitive Behaviour Therapy*, January 2020, COMM0059307, Exhibit P-002628, p 57.

⁸⁴ A. Stelnicki, L. Jamshidi, A. Fletcher, and R. Carleton, “Evaluation of Before Operational Stress”, COMM0059233, Exhibit P-003142, p. 2.

⁸⁵ A full description of the Before Operational Stress program is included in A. Stelnicki, L. Jamshidi, A. Fletcher, and R. Carleton, “Evaluation of Before Operational Stress”, COMM0059233, Exhibit P-003142, p 4-5.

⁸⁶ C. Burns and M. Buchanan, “Factors that influence the decision to seek help”, COMM0059235, Exhibit P-003155, p 16-17, 21.

accessing psychological assistance. Some accessed psychological services surreptitiously, although their access was often delayed. Several participants described learning from those difficult experiences, choosing to adopt a more supportive approach when they became supervisors themselves.

68. The Commission's record includes the RCMP's "Toolkit for Managers/Supervisors – Speaking to Staff on Mental Health".⁸⁷ The NPF submits that this resource is not sufficient to achieve the meaningful cultural change required to improve mental health outcomes among its Members, or to reduce stigma around mental illness. In particular, it does not normalize the need for regular and proactive discussions around mental health, or acknowledge the particular context in which police officers experience cumulative trauma.
69. Enhanced mental health training should also be a mandatory part of police college training, and should be made available to any Member who wishes to access it later in their career. The NPF believes that by targeting new Members, all supervisors, and those Members with a particular interest in mental health training, police organizations including the RCMP will be most likely to experience a cultural shift.

The NPF requests that the Commission recommend that the RCMP take steps to address organizational stressors which contribute to the risk of OSI in its Members. In particular, the Commission should recommend that the RCMP must provide:

- a. Policy for the temporary modification of regular duties to allow for appropriate individual or team reintegration or recovery from a critical incident, *without* going "off duty sick" or first being deemed medically unfit for regular duties;
- b. Adequate staffing to reduce burnout and permit administrative, medical or other leaves necessary to promote wellness; and
- c. Enhanced mental health training for supervisors and officers, to promote cultural change.

B. Improvements to post-critical incident supports

70. The RCMP currently employs a Critical Incident Stress Management ("CISM") peer support approach to aftercare for Members, including by conducting Critical Incident Stress Debriefings ("CISD") after an event. As described in the MacNeil Report: "the

⁸⁷ "RCMP Mental Health Strategy - Toolkit for Managers/Supervisors: Speaking to Staff on Mental Health", COMM0053647, Exhibit P-003139.

emphasis during CISD is on mitigating distress, facilitating psychological normalization, providing effective stress management education, identifying external coping resources, and restoring unit cohesion and performance”.⁸⁸ Most Members interviewed by the Commission reported having participated in a CISD following the mass casualty.

71. After participating in a CISD, however, Members who require individual counseling or psychotherapy are left to initiate access to these services independently, and may be prevented from doing so because of operational or organizational barriers, including those discussed above. After the mass casualty, the RCMP did not implement any plan for ongoing proactive follow-up for Members directly involved in the mass casualty event,⁸⁹ or for mandatory psychological assessments for these impacted Members. As a result, many did not seek the help that they needed until their work or home life became disrupted by their symptoms.
72. The MacNeil Report recommended that the CISM team should consist of experienced psychologists who understand policing,⁹⁰ and RCMP personnel trained in CISM. After the mass casualty event, however, the RCMP sought support from additional personnel seconded from the Canadian Armed Forces.⁹¹ It is unclear whether these personnel possessed the necessary background in policing, or the appropriate CISM training to deliver high fidelity programming.⁹²
73. Formal peer support follow up after the CISD was also insufficient to meet Members’ needs, with only 31% of Respondents to the NPF Member Wellness Survey reporting that they received such supports.⁹³ Even among those who did receive it, NPF Members indicated that the RCMP’s formal peer support program ranks as the *least useful* support that they received after the mass casualty event.⁹⁴ Some common complaints about formal peer support programming include inappropriate matching of peer supporters (lacking relevant experience), inconsistent or no follow up (the vast majority

⁸⁸ A. MacNeil, “Independent Review - Moncton Shooting – June 4, 2014” [MacNeil Report], COMM0050877, Exhibit P-01622, p 93.

⁸⁹ See MacNeil Report, COMM0050843, P-001629, Recommendation 12.4.; C. Burns and M. Buchanan, “Factors that influence the decision to seek help”, COMM0059235, Exhibit P-003155, Table 4.

⁹⁰ See also C. Burns and M. Buchanan, “Factors that influence the decision to seek help”, COMM0059235, Exhibit P-003155, Table 4.

⁹¹ Letter from D. Moser to H-Div ERT, COMM0064832, [to be exhibited]; Email from Anna Nagy, April 28, 2020, COMM0017463, P-02985; Email from Natascha Lamontagne, April 27, 2020, COMM0017459, P-02891; Text messages between Robert Doyle and Kelly Sullivan, COMM0064496, [to be exhibited].

⁹² J. Price et al, “Critical Incident Stress Management”, COMM0059230, Exhibit P-003166, p. 2.

⁹³ National Police Federation, Member Wellness Survey, COMM0064755, [to be exhibited], p 61.

⁹⁴ National Police Federation, Member Wellness Survey, COMM0064755, [to be exhibited], p 70-71.

spoke only once or twice), lack of confidentiality, and the feeling that the RCMP was “checking a box” by requiring peer support contact.⁹⁵

74. The Commission has received expert evidence from researchers at the University of Regina which suggests that police agencies should implement uniform standards, offer better and more appropriate training and supervision for peer supporters, and facilitate independent research on the effectiveness of peer support programming.⁹⁶ The NPF endorses these recommendations.

The NPF seeks a recommendation from the Commission that improves critical incident aftercare for Members, including:

- a. Ensuring sufficient, appropriately trained resources are available to conduct CISD;
- b. Following up in a structured manner with all involved Members, to ensure they are receiving the support they need after the CISD, including one on one counseling; and
- c. Improving effectiveness of formal peer support programs through appropriate training, staffing, and resourcing, and ensuring that the approach to peer support is evidence-based.

C. Support for families of first responders

75. Research available to the Commission suggests that police officers in need of mental health support are most likely to reach out to friends and family, as compared to other professional or workplace resources.⁹⁷ This finding is consistent with the information collected by the NPF from Members involved in the mass casualty, 51% of whom indicated that they relied on their spouse or another close family member for mental health supports after the event.⁹⁸

⁹⁵ National Police Federation, Member Wellness Survey Report, COMM0064754, [to be exhibited], p 4.

⁹⁶ “Peer Support and Crisis-Focused Psychological Intervention Programs in Canadian First Responders”, 2016, COMM0059243, P-002629, p. 45; see also C. Burns and M. Buchanan, “Factors that influence the decision to seek help”, COMM0059235, Exhibit P-003155, Table 4.

⁹⁷ R. Carleton et al, “Mental health training, attitudes toward support, and screening positive for mental disorders”, COMM0059307, Exhibit P-002628, at p. 68.

⁹⁸ National Police Federation, Member Wellness Survey, COMM0064755, [to be exhibited], p 78.

76. Carleton et al have recommended that spouses of police officers would benefit from mental health training to assist them in providing this support. Their research recommends “evidence-based psycho-education regarding symptoms, self-care, coping skills and resources for escalating access to professional mental health support”.⁹⁹ The NPF endorses these recommendations.

The NPF requests that the Commission recommend that the RCMP provide evidence-based training and peer support to spouses and families of RCMP Members, recognizing the role they play in supporting Member wellness and the vicarious trauma they experience.

IV. MULTI-AGENCY SUPPORTS FOR VICTIMS AND FAMILIES

77. The needs of victims and families following a mass casualty are significant, wide ranging, and evolve from the immediate aftermath of the event through the long term. A holistic, inter-agency response protocol must be established and be available to be activated to support victims and families from the first moments of the critical incident.
- A. Role of police family liaison officer must be clearly and narrowly defined
78. The role of police in supporting victims and families in the aftermath of a mass casualty event must be clearly and narrowly defined. The NPF submits that Members are best suited to identifying victims and crime scenes, and performing investigative tasks in support of the reunification of victims with family members. They also have a role to play in sharing timely and accurate information about the mass casualty event to victims and families, in a manner that protects the integrity of any ongoing investigation.
79. Beyond these roles, civilians and other agencies with appropriate training and experience will be better placed to meet the many other needs of families and victims.

The NPF requests that the Commission recommend that the RCMP and municipal police agencies in Nova Scotia establish policies to define the role of FLOs following a mass casualty or comparable critical incidents, which is to identify victims and crime scenes, perform investigative tasks in support of the reunification of victims with family members, and facilitate the sharing of timely and accurate information about the mass casualty event and subsequent investigation with victims and families.

⁹⁹R. Carleton et al, “Mental health training, attitudes toward support, and screening positive for mental disorders”, COMM0059307, Exhibit P-002628, at p 68.

B. FLOs must be properly trained and supported with guidelines and protocols

80. Where Members are called upon to perform FLO roles, they must be adequately and appropriately trained and supported. The evidence before the Commission is that RCMP Members do not receive specific training regarding the scope of the FLO role or how to perform it effectively.¹⁰⁰
81. The RCMP also lacks protocols or other guidance to support FLOs in performing their role. For example, there were no trauma-informed protocols on the appropriate caseload for a FLO; on how to identify or manage communications with families with complex dynamics, or when conflicts arose within families;¹⁰¹ or on the return to family members of residences, vehicles, or personal property that had been examined by forensic investigators.¹⁰²

The NPF requests that the Commission recommend that the RCMP and municipal police agencies in Nova Scotia establish protocols to guide the training and work of FLOs.

C. Activation of a FLO manager and team as part of the critical incident package

82. A designated victim management or family liaison manager and support team must be embedded within the critical incident response from the beginning of a mass casualty event, to coordinate the identification of victims and their families, the assessment of their needs, timely next of kin notifications, and connecting of victims and families with services from an early stage.¹⁰³
83. The Commission heard evidence that FLOs within the RCMP have traditionally acted as an informational conduit between the Major Crimes Unit (MCU) Command Triangle and family members.¹⁰⁴ It was therefore not until the file was transitioned from the Critical Incident Commander to the MCU in the afternoon of Sunday, April 19, 2020, that Cst. Skipper Bent fully assumed the role of FLO, to which he had been assigned overnight.¹⁰⁵

¹⁰⁰ Testimony of C/Supt Campbell, COMM0061287, p. 13, lines 7-9.

¹⁰¹ Testimony of Cst. Wayne Bent, COMM0059676, June 21, 2022, p. 58, lines 4-13.

¹⁰² Testimony of Cst. Bent, COMM0059676, p. 39, lines 9-14; p. 57, lines 10-15; p. 76, lines 13-23; *Support Services for Survivors, Families, and Communities Foundational Document ("Support Services")*, COMM0059120, Exhibit P-002346, para 116.

¹⁰³ Testimony of Cst. Danielle Bottineau, Participant Consultations: Victim Advocacy Organizations, August 29, 2022, COMM0063628, p. 53, lines 26-27, p. 55, lines 5-7; Testimony of Sue O'Sullivan, Participant Consultations: Victim Advocacy Organizations, COMM0063628, p. 90, lines 16-23.

¹⁰⁴ Testimony of Cst. Bent, COMM0059676, p. 198, lines 16-19; p. 46.

¹⁰⁵ Testimony of Cst. Bent, COMM0059676, p. 20, lines 3-15.

In the initial hours of coming on duty, Cst. Bent was instead tasked with other investigative duties in support of the MCU as a matter of priority.¹⁰⁶

84. Moreover, although Cst. Bent was assigned as FLO, he did not have a specific responsibility for next of kin notifications as part of that role, which instead remained the responsibility of the CIC S/Sgt Jeff West and then the MCU Primary Investigator, Cpl. Gerry Rose-Berthiaume.¹⁰⁷ Next of kin notifications were tasked to various Members on April 19, 20, and 21, 2020.
85. The NPF submits that a dedicated FLO in the command post on April 18-19, 2020, with responsibility for coordinating a trained team to identify, track, and support victims and families, could have benefited the police response, including by assisting in ensuring timely outreach to the MacDonalds, earlier identification of the casualties on Cobequid Court, and more timely next of kin notifications in some cases.

The NPF requests that the Commission recommend that the RCMP and municipal police agencies review existing policies and protocols applicable to critical incidents to provide for the activation of FLOs as part of the critical incident package in mass casualty events, and to ensure that an adequate team of dedicated FLOs are trained and available in the event of a mass casualty or comparable critical incident.

D. Coordinated system and protocols for receiving, tracking, and following up on information received from families

86. A coordinated system for receiving, cross-referencing, and following up on information or inquiries from families must be established and be available to be activated as soon as a mass casualty occurs.
87. The Commission heard evidence that on April 18-19, 2020, the RCMP had no dedicated point of contact for families of victims seeking information about missing relatives. Families instead sought information from an already overwhelmed OCC. Call-takers transmitted these requests for information in an ad hoc manner to Members, who were already busy juggling numerous urgent tasks.¹⁰⁸

¹⁰⁶ Testimony of Cst. Bent, COMM0059676, p. 19, lines 19-28, p. 20, lines 3-15.

¹⁰⁷ Testimony of Cst. Bent, COMM0059676, p. 23, lines 14-17, p. 25, lines 10-12.

¹⁰⁸ e.g. *Information Seeking from Families and Next of Kin Notifications Foundational Document ("Next of Kin")*, COMM0058972, Exhibit P-002222, paras 18, 22-23, 100-102, 188.

88. Lessons can be learned from other police agencies which are currently implementing new initiatives in this regard. For instance, the Toronto Police Service and Peel Regional Police have dedicated 1-800 numbers to activate in mass casualty situations, for those seeking information about missing loved ones, in order to take pressure off the 911 system.¹⁰⁹ The Peel Regional Police has developed a software, compatible with its case management system, to centralize information about potential victims from call-takers, family liaison officers, and investigators, to enable timely and accurate identifications.¹¹⁰

The NPF requests that the Commission recommend that the Province of Nova Scotia, in coordination with the RCMP and municipal police agencies, establish a dedicated 1-800 number for families to share and seek information about missing relatives during a mass casualty event, and provide appropriate public education about the 1-800 number.

E. Needs that cannot be met by police must be met by other agencies

89. It is important for the Commission to recognize that many needs experienced by victims and families are not best met by police. Community and social services and agencies must be tasked and adequately resourced to address the full range of those needs.
90. The evidence before the Commission supports that Nova Scotia did not have adequate structures and supports in place to provide families with the wraparound services they required following the mass casualty. Nova Scotia Victim Services, for example, had a mandate that was limited to supporting victims and families in navigating the criminal justice system, and was not well resourced or prepared to meet the needs of families and communities created by this mass casualty event.¹¹¹
91. Gaps in supports offered by existing agencies, including Victim Services, Nova Scotia Health Authority, and municipalities, in the days, weeks, and months following April 18-19, 2020, led to the FLO performing numerous tasks for families unconnected to the MCU investigation, for which sworn Members have little training or applicable experience. These included: liaising with insurance companies; arranging for the cleaning of residences, vehicles, and personal property; receiving and delivering gifts, cards, and donations; and communicating with family members about concerns

¹⁰⁹ Testimony of Cst. Danielle Bottineau, Participant Consultations: Victim Advocacy Organizations, COMM0063628, p. 63, lines 5-25; Testimony of Cst. Helen Burton and Insp. Thomas Warfield, Participant Consultations: Victim Advocacy Organizations, COMM0063628, p. 69-70.

¹¹⁰ Testimony of Cst. Helen Burton and Insp. Thomas Warfield, Participant Consultations: Victim Advocacy Organizations, COMM0063628, p. 69-70.

¹¹¹ Mass Casualty Commission - Transcript of Interview with Dana Bowden, March 7, 2022, COMM0054246, Exhibit P-002415, p. 3, 4-5, 9.

regarding media coverage and online commentary.¹¹² The NPF submits that these tasks are not best suited to a police officer, and are not the best use of police resources in the aftermath of a mass casualty event.

92. Interagency relationships and clear roles and responsibilities must be defined and formalized *before* the next crisis occurs, to allow for the seamless and effective delivery of these and other services. The more recent establishment of an “integrated support model” working group involving Victim Services, RCMP, Medical Examiner’s Office, NSHA, and other agencies has been a welcome development – for example, to assist with sharing information and updates with families in a trauma-informed manner.¹¹³ However, this pilot initiative was not introduced until several months after the mass casualty, in December 2020, so was not available to meet the most immediate needs of families following the mass casualty.

The NPF requests that the Commission recommend that the Province of Nova Scotia formalize its integrated support model to ensure appropriately resourced, seamless delivery of wraparound services to victims and families following a mass casualty event.

V. AN EMERGENCY AIR SUPPORT STRATEGY FOR THE ATLANTIC REGION

93. On April 18-19, 2020, adequate air support was not available to the RCMP during its response to the mass casualty.
94. To ensure Atlantic Canada is better prepared in the event of a future critical incident requiring properly equipped air support, the Atlantic Canadian Provincial Governments, together with the Federal Government, must develop an Emergency Air Services Strategy. This strategy must ensure that all police services in Atlantic Canada either have their own air services, or have formal agreements with other agencies or government entities, to enable police to quickly access appropriate air services when needed.
- A. Dedicated air support for critical incidents within the Atlantic Region
95. The critical incident response to the mass casualty would have benefited from timely and appropriately equipped air support for several reasons: (a) to transport ERT Members more quickly to the hot zone; (b) to assist in search for the perpetrator or

¹¹² Testimony of Cst. Bent, COMM0059676, p. 39-43; *Support Services*, COMM0059120, Exhibit P-002346, paras 94, 97, 120, 139, 153, 221, 267, 299.

¹¹³ Interview with Dana Bowden, COMM0054246, Exhibit P-002415, p. 18.

- victims; and (c) to provide cover and visibility to Members operating in the hot zone and allow evacuation of the area.
96. The evidence before the Commission clearly indicates that RCMP Members responsible for the police response to the mass casualty sought but were not able to access appropriate air support resources.
97. RCMP Atlantic Region Air Services (“ARAS”) is based out of Moncton, New Brunswick and provides air support to RCMP divisions in all four Atlantic provinces.¹¹⁴ No other police agencies in Nova Scotia have air assets of their own. ARAS had a single Airbus H125 helicopter, and two pilots. The evidence before the Commission suggests that, had it been immediately available, this aircraft was sufficient to meet the needs of police on April 18-19, 2020, as it was equipped with a surveillance package, including thermal imaging, and able to fly at night with night vision technology. It was also able to transport up to six passengers.
98. Air support was first requested from ARAS by the OCC at the request of the Risk Manager within the first hour of the police response to calls for service in Portapique.¹¹⁵ Once called, the ARAS helicopter could have been in Portapique within 90 minutes, and remained capable of immediately assisting for more than two hours before refueling.¹¹⁶ S/Cst. Larry Labadie estimated that he could have arrived in the Portapique area in the ARAS helicopter shortly after midnight, had it been available. The available infrared technology would have been capable of searching for a “hot car”, including one that had been parked for several hours.¹¹⁷
99. Helicopters require regular maintenance which takes approximately four weeks at a time to complete, and pilot flying time is heavily regulated. During the mass casualty, the ARAS helicopter was down for maintenance, for an extended period of time – lengthened because of staff shortages due to the COVID pandemic.¹¹⁸ This unfortunate circumstance does not seem to have been an isolated incident, however. Members responsible for coordinating responses to critical incidents gave evidence that, in their

¹¹⁴ *Air Support* Foundational Document, COMM0058856, Exhibit P-002042, para 32.

¹¹⁵ *Air Support*, COMM0058856, Exhibit P-002042, para 60-61.

¹¹⁶ *Air Support*, COMM0058856, Exhibit P-002042, para 33-34, 40; Mass Casualty Commission – Transcript of Interview with S/Cst. Larry Labadie, October 13, 2021, COMM0037118, Exhibit P-001573, p 3. S/Cst. Labadie estimated that he could have had the helicopter in the air within 45 minutes from receiving a call for service.

¹¹⁷ Interview with S/Cst. Labadie, COMM0037118, Exhibit P-001573, p 3.

¹¹⁸ S/Cst. Larry Labadie’s evidence was that the helicopter was down for maintenance for “six weeks” from March 1, 2020, to May 12, 2020. It is unclear whether the helicopter was being serviced between this a 10-week period, or for a different six-week period. See *Air Support*, COMM0058856, Exhibit P-002042, para 39.

experience, air support was not available to them when they needed it, due to maintenance or the pilot having already flown too many hours in that month.¹¹⁹

100. The evidence before the Commission suggests that seven pilots are required to provide emergency air support coverage on a 24-hour basis, 365 days per year.¹²⁰ ARAS currently operates with two pilots.
101. It is not appropriate for the Atlantic region to have to rely on RCMP air support assets from another region as the first available air assets during an emergency. The next closest available RCMP air assets were stationed too far away to be of any immediate use, in Montreal (782 km away), Goose Bay (910 km away) and Ottawa (928 km away). All of these assets would have taken more than three hours to arrive, and required refueling before being capable of assisting.¹²¹ The Commission does not have evidence about whether these assets were themselves available to fly on April 18, 2020, or whether they had thermal imaging or other necessary equipment.¹²²
102. Civilian air assets were not equipped to meet the needs of the critical incident response, or were not available to the RCMP on April 18-19, 2020. Though the RCMP was able to access a helicopter from the provincial Department of Natural Resources (“DNR”) on the morning of April 19, 2020, this aircraft was not equipped with thermal imaging or other police surveillance technology, and was not able to fly at night.
103. Military aircraft were not available to the RCMP on during the mass casualty, though a request was made once it became apparent that ARAS could not assist. In response to requests made at 11:45 pm on April 18, 2020, and again at 10:57 am on April 19, 2020, the Joint Rescue Coordination Centre (“JRCC”), responsible for search and rescue operations in the region, advised that it could not respond to an active shooter situation.¹²³ JRCC resources also did not have thermal imaging capabilities. CAF helicopter resources in Nova Scotia are only available after a 12-hour notice period.¹²⁴
104. On April 19, the RCMP OCC was informed by JRCC that a formal request had to be made by the Nova Scotia Emergency Management Office to the Minister of National

¹¹⁹ Testimony of S/Sgt. Brian Rehill, May 30, 2022, COMM0058857, p. 119-120; *Air Support*, COMM0058856, Exhibit P-002042, para 39.

¹²⁰ Interview with S/Cst. Labadie, COMM0037118, Exhibit P-001573, p 4.

¹²¹ *Air Support*, COMM0058856, Exhibit P-002042, para 41-42.

¹²² “Supplementary Report to Identify RCMP Air Support Assets in the Atlantic Region, Quebec and Ontario on April 18/19, 2020”, May 16, 2022, COMM0058846, Exhibit P-002045.

¹²³ *Air Support*, COMM0058856, Exhibit P-002042, para 61-63, 66-67.

¹²⁴ Mass Casualty Commission - Transcript of Interview with Col. David Holmes, June 9, 2022, COMM0059685, Exhibit P-05586, p. 7-9.

Defence in order to obtain assistance from the CAF.¹²⁵ This limitation on military support to domestic law enforcement (“Assistance to Law Enforcement Agency” or “ALEA”) arises from s. 273.6(2) of the *National Defence Act*, which permits military involvement only where it is determined to be necessary and in the national interest.¹²⁶ There is no evidence that the RCMP or EMO had been educated regarding the ALEA request process before the mass casualty, and it has been suggested that it would have been more appropriate for a request for ALEA to be sent directly to the CAF.¹²⁷

The NPF requests that the Commission recommend that the four Atlantic provinces and the Government of Canada develop and implement an Emergency Air Services Strategy, to ensure that air support is available to all police services in Atlantic Canada during critical incidents, including active shooter situations. This strategy must:

- a. Ensure that all police services in Atlantic Canada have formal agreements to access either RCMP ARAS or other air support resources at any time;
- b. Consider the various purposes for which police may require air support, including (but not limited to) transport of specialised personnel, surveillance, or active shooter cover;
- c. Ensure that as a top tier of air support, police in Atlantic Canada have access at any time on an urgent basis to an aircraft and pilot which are capable of flying at night, and during an active shooter situation, equipped with thermal imaging technology and other search and rescue equipment;
- d. Allow for collaboration between police and other emergency response agencies to share access to civilian agency or private aircraft, for efficient allocation and shared funding of resources;
- e. Provide for clear policies and procedures to rapidly access air support throughout the Atlantic provinces, depending on police requirements and for all partner agencies, and ensure that critical incident commanders and police dispatchers are trained to request these services; and
- f. Ensure that RCMP ARAS or other air support resources that form part of the regional strategy are resourced to ensure sufficient aircraft, pilots, and maintenance personnel, to offer support 24 hours per day/365 days per year.

¹²⁵ *Air Support*, COMM0058856, Exhibit P-002042, para 106-107, 111.

¹²⁶ *National Defence Act*, RSC 1985, c N-5.

¹²⁷ Mass Casualty Commission - Transcript of Interview with Col. David Holmes, June 9, 2022, COMM0059685, Exhibit P-05586, p. 7-9.

VI. IMPROVED TECHNOLOGY FOR SITUATIONAL AWARENESS AND INTEROPERABILITY

105. NPF Members depend heavily on equipment and technology, including communication and information management tools, to perform their duties. The record before the Commission reveals numerous examples where a lack of appropriate technology limited Members' ability to respond to the mass casualty event.
106. The NPF seeks recommendations to implement GPS and mapping systems that allow for increased situational awareness and a common operating picture among general duty, specialized services, and command personnel, as a matter of urgent priority. The Province of Nova Scotia must also work with the RCMP and municipal police agencies to eliminate barriers to the interoperability of technology and systems that are essential to effective communication and information-sharing during a critical incident.

A. GPS technology for situational awareness and a common operating picture

107. During the mass casualty event, the only method of GPS location for general duty Members was via the Mobile Work Station (MWS) in their police vehicles. While this technology represented an improvement over what had been available during previous active shooter situations,¹²⁸ it had significant limitations. A Member is not visible to the OCC, command post or other Members if the Member's MWS is not functioning or not logged in, if the Member's vehicle does not have a MWS, or if the Member is outside their vehicle.¹²⁹
108. A Risk Manager or CIC must be able to monitor the location of Members outside their vehicles in real-time through GPS tracking to mount an effective critical incident response. This limitation impacted the response to the mass casualty in many significant ways, jeopardizing both officer safety and public safety.
109. The inability to track the initial contact team while on foot in Portapique, for example, meant that it was too risky for commanders to send in a second team, given the risk of crossfire in the context of a dark, wooded and rural environment.¹³⁰ Senior NCOs in the command post needed to rely on hand-drawn maps to gain a common operating

¹²⁸ MacNeil Report, COMM0050843, P-001629, p. 118, recommendation 7.8.

¹²⁹ E.g., Testimony of S/Sgt. Rehill, COMM0058857, p. 101, lines 20-28.

¹³⁰ Testimony of S/Sgt. Rehill, COMM0058857, p. 101, lines 20-28; Testimony of Cst. Stuart Beselt, COMM0053615, p. 88, lines 10-13; Testimony of IARD Witness Panel, COMM0053615, p. 90, lines 18-28.

picture of the containment points being maintained by Members outside their vehicles, because they were not visible alongside members in cars.¹³¹

110. The Commission heard evidence that the command post also had no ability to monitor the movements of ERT resources on the ground in Portapique, either.¹³² ERT had been using handheld technology with GPS and live mapping capabilities called Android Tactical Assault Kit (ATAK) on a pilot project basis at the time of the mass casualty, but that the technology was unavailable on April 18-19, 2020.¹³³
111. None of the specialized vehicles belonging to ERT, EMRT, or PDS, or the unmarked vehicles used by GIS and MCU investigators, is equipped with an MWS.¹³⁴ This meant that these Members were not visible to the OCC or command post, This lack of common operating picture made it extremely challenging to coordinate a strategy for containing or cutting off the perpetrator, and impeded the CIC's overall command of resources.¹³⁵ Members without an MWS were also not able to see the location of other RCMP vehicles on the road – a significant issue where the perpetrator was also in a marked cruiser, and the ability to identify other officers was critical to safety.
112. The lack of a MWS in many vehicles limited Members' ability to receive text, images or mapping directions from the OCC. Members without MWS accordingly spent valuable time communicating by radio or phone with the Risk Manager and dispatchers to orient them to the location of calls or to the position of other Members.¹³⁶ This was particularly challenging in Portapique, which was unlit and lacked reference points such as visible street signs or civic address numbers.¹³⁷
113. Risk Managers and dispatchers in the OCC also cannot track RCMP Members responding from other Divisions when they cross provincial borders. The Commission heard that the OCC is currently working to create a CAD "super agency" which would

¹³¹ RCMP Command Post, Operational Communications Centre, and Command Decisions Foundational Document ("*Command Decisions*"), COMM0061298, Exhibit P-001461, para 268; Hand-drawn map of Portapique used by the Command Team, COMM0011833, Exhibit P-001463.

¹³² Testimony of Cpl. Tim Mills and Cpl. Trent Milton, May 16, 2022, COMM0058512, p. 69, lines 2-5, p. 70, lines 5-7.

¹³³ ERT, COMM0057766, P-001370, paras 45-46. See also "Supplementary Investigation Report re J Division ERT ATAK", May 19, 2022, COMM0058517, Exhibit P-005119.

¹³⁴ Testimony of Cpl. Milton, COMM0058512, p. 49, lines 21-22; "Supplementary Investigation Report re J Division ERT ATAK", COMM0058517, Exhibit P-005119.

¹³⁵ Testimony of S/Sgt. Kevin Surette, May 18, 2022, p. 122, lines 10-15.

¹³⁶ Testimony of Cpl. Mills and Cpl. Milton, COMM0058512, p. 50-51.

¹³⁷ Testimony of Cpl. Mills, COMM0058512, p. 51, lines 12-14.

allow OCC dispatchers and Risk Managers to do so, but this has yet to be fully operationalized.¹³⁸

114. Shortcomings in GPS and mapping technology is not a new issue for the RCMP. The MacNeil Report recommended "GPS tracking ability for Members to ensure they can be located and tracked when dismounted from their vehicles."¹³⁹ The MacNeil Report also noted that "H" Division Members who responded to Codiac RCMP's requests for resources could not be tracked or monitored by Codiac OCC on CIIDS,¹⁴⁰ and recommended that the RCMP explore options to allow for a common operating picture in such circumstances.¹⁴¹ These recommendations in the MacNeil Report had not been fully implemented at the time of the mass casualty.
115. The evidence before the Commission indicates that RCMP has made some improvements to GPS and mapping technology since April 2020, including that ATAK has been rolled out to all RCMP ERT and PDS Members across Canada.¹⁴² The evidence suggests that ATAK may also be available to a small number of other specialized services in H Division, such as Tactical Support Unit Members, EMRT Members, and the Risk Managers in the OCC.¹⁴³ While the rollout of ATAK to RCMP general duty Members has been approved, it is not scheduled to occur until December 2023.¹⁴⁴
116. The NPF remains concerned that these improvements do not completely address the challenges experienced during the police response to the mass casualty. Without access to GPS on portable radios or a handheld technology such as ATAK, the vast majority of Members still cannot be tracked outside their vehicles, or see the location of their colleagues during an IARD response. Moreover, OCC, Risk Managers, CICs, and Members on the ground will continue to lack a common operating picture if specialized resources are operating on one mapping platform (ATAK), while general duty resources are operating on another (CIIDS/MWS). The majority of RCMP ERT

¹³⁸ Mass Casualty Commission - Transcript of Interview with Darryl MacDonald, February 8, 2022, COMM0053351, Exhibit P-000278, p. 8-9.

¹³⁹ MacNeil Report, COMM0050843, P-001629, p. 119, recommendation 7.9.

¹⁴⁰ MacNeil Report, COMM0050842, P-001628, p. 25; COMM0050843, P-001629, p. 115-17.

¹⁴¹ MacNeil Report, COMM0050842, P-001628, recommendations 3.4 and 3.5.

¹⁴² Implementation of MacNeil Recommendations, June 23, 2022, COMM0060152, p. 3.

¹⁴³ RCMP H Division Response to June 2, 2022 Subpoena for Written Evidence, June 2, 2022, COMM0059949, Exhibit P-003952, p. 11.

¹⁴⁴ RCMP H Division Response to Subpoena, COMM0059949, Exhibit P-003952, p. 11; Implementation of MacNeil Recommendations, June 23, 2022, COMM0060152, p. 3; Mass Casualty Commission - Transcript of Interview with Commr. Brenda Lucki, August 4, 2022, COMM0062475, Exhibit P-004221, p. 124.

teams across Canada do not have MWS in their vehicles,¹⁴⁵ and ATAK also does not integrate with the RCMP's CAD system, CIIDS.¹⁴⁶

117. Equipping specialist and unmarked vehicles with MWS would improve the ability of CICs and Risk Managers to coordinate the pursuit of a mobile suspect, for example. While physical limitations on space is a reason that some specialized vehicles have not been equipped with an MWS, modern handheld technology, such as a tablet, could replace the functionality of an MWS in Members' vehicles, as is currently being tested in H Division.¹⁴⁷

The NPF requests that the Commission recommend that the RCMP acquire and implement technology necessary to:

- a. Immediately equip all specialized and unmarked vehicles (e.g., ERT, EMRT, PDS, TAV, GIS, FIS) with MWS;
- b. As soon as possible and no later than December 2023, equip the OCC/CIC and all Members with, and train all Members in the use of, GPS and mapping technology to allow them to be tracked and monitored in and out of their vehicles in real time, such as the Android Tactical Assault Kit (ATAK) system and/or a GPS-enabled portable radio system that integrates with CIIDS; and
- c. Integrate the computer aided dispatching systems used in its operational communications centres, such as by establishing a "super agency" CAD, to enable the tracking and monitoring of Members across provincial borders.

B. Technology and systems for interoperability

118. The Commission should also consider the need to improve the interoperability of technology as between divisions of the RCMP, different police agencies, and other public service personnel. For example, the OCC cannot track or monitor Halifax District RCMP Members through their MWS, who are dispatched by Halifax IES using different technology, or police officers from other agencies in neighbouring jurisdictions.¹⁴⁸ Many police agencies in Nova Scotia do not have a computer-aided dispatch system

¹⁴⁵ MWS Request, April 6, 2022, COMM0065010 [to be exhibited]; ERT EMRT AARs Review Summary, August 18, 2022, COMM0064616, p. 10 [to be exhibited].

¹⁴⁶ Testimony of Darryl MacDonald, June 23, 2022, COMM0059341, p. 124, lines 9-10.

¹⁴⁷ Affidavit and supporting materials of Pharanae Croistiere, COMM0062461, Exhibit P-004158.

¹⁴⁸ Testimony of Cmdr. MacDonald, Roundtable: Interoperability, COMM0059341, p. 48, lines 27-28..

at all.¹⁴⁹ As emphasized in the MacNeil Report, the ability for different police agencies in Nova Scotia to mount a coordinated response to a critical incident is hampered if those in command cannot track resources, and if police officers cannot see one another.

The NPF requests that the Commission recommend that the Province of Nova Scotia:

- a. Consult with the RCMP and municipal police agencies to develop a procurement strategy for the adoption of technology that allows for a common operating picture and situational awareness during a multi-agency response; and
- b. Adopt a provincial standard requiring, at a minimum, that all municipal police agencies in Nova Scotia adopt GPS and mapping technology to allow their general duty and specialist members to be tracked and monitored by their dispatchers both in and out of their vehicles, in real time.

C. High-resolution satellite mapping for situational awareness

119. The mass casualty demonstrated the importance of reliable, high-resolution, up-to-date satellite mapping technology for gaining situational awareness and establishing effective containment during a critical incident. Such technology is particularly important when responding to events in rural and remote areas of Nova Scotia, where Members cannot be expected to have intimate knowledge of the geography, including on private land.

120. In order for technology to be effective, Members must be aware of the existence, availability, and capabilities of the technology, and have sufficient training on how to access and use it when the need arises. Evidence before the Commission suggests that while Pictometry technology was available within the RCMP and may have allowed Members to identify a traversable route out of Portapique through the blueberry field, Members were impeded by a lack of training or ready access to that platform.¹⁵⁰ In the

¹⁴⁹ Testimony of Chief Dave MacNeil, June 6, 2022, COMM0058947, p. 95; Testimony of Cmdr. Darryl MacDonald, Roundtable: Emergency Communications and Interoperability Among Agencies, June 23, 2022, COMM0059341, p. 49, lines 7-15.

¹⁵⁰ S/Sgt. Rehill testified that he had limited familiarity with Pictometry's functionality (Testimony of S/Sgt. Rehill, COMM0058857, p. 167, lines 25-28); Neither S/Sgt. Carroll nor Sgt. O'Brien recalled using or being trained on the program (Testimony of S/Sgt. Allan Carroll, May 26, 2022, COMM0058601, p. 45-47; Mass Casualty Commission – Transcript of Interview of S/Sgt. Allan Carroll, November 10, 2021, COMM0019386, p. 20; Testimony of Sgt. O'Brien, COMM0058858, p. 7, lines 10-12); S/Sgt. Halliday stated he was not "overly familiar" with Pictometry, did not personally have access to it, and was unaware of any Members of the command team who did (Testimony of S/Sgt. Steve Halliday, May 17, 2022, COMM0058514, p. 120, lines 18-27); while S/Sgt. Maccallum was familiar with Pictometry, he was unable to access it at the Bible Hill

absence of access to Pictometry, Members in the command team relied on inferior maps that did not identify that a private road through the blueberry field connected Cobequid Court to Brown Loop.¹⁵¹

The NPF requests that the Commission recommend that the RCMP and all municipal police agencies in Nova Scotia:

- a. Adopt and maintain up-to-date satellite mapping technology, such as Pictometry, capable of providing high-resolution images of all areas within their policing jurisdictions; and
- b. Provide training to Critical Incident Commanders, Risk Managers, dispatchers, and frontline supervisors on the use and functionality of the mapping technology, which should be refreshed on an annual basis.

D. Interoperability of computer-aided dispatch and records management systems

121. Police and other public safety agencies in Nova Scotia must be able to disseminate information accurately and rapidly in an evolving critical incident. Uniform or interoperable systems are necessary to allow agencies to share information effectively, while the minimizing risk of disjointed response efforts or information gaps.¹⁵²
122. Throughout the mass casualty, RCMP Members and dispatchers provided regular updates to other districts and police agencies through telephone calls and “be on the look out” alerts (BOLOs),¹⁵³ which included the most recent information available to the RCMP on the suspect’s vehicles and last-known location.
123. However, the effectiveness of this interagency communication was limited by the lack of interoperable technology, leading to overreliance on the telephone to communicate between agencies. Telephone communication is time-consuming, and not optimal for disseminating information broadly and consistently across and within agencies.¹⁵⁴

detachment despite making a substantial effort to do so (Testimony of S/Sgt. Addie MacCallum, June 8, 2022, COMM0058948, p. 164, line 13 to p. 165, line 7).

¹⁵¹ *Supplementary Report regarding Analysis of Pictometry*, April 21, 2022, COMM0056422, Exhibit P-001546, p. 12.

¹⁵² C. Taylor Griffiths, “Interagency Communication, Collaboration, and Interoperability within Police Services and Between Police Services and Other Emergency Services”, COMM0058936, Exhibit P-002324, p. 3.

¹⁵³ *Truro Police Service – April 19, 2020 Foundational Document*, paras 25, 27, 28, 33, 35, 37, 51-54, 61, 86, 95-97, 106, 117; Interview with Darryl MacDonald, COMM0053351, Exhibit P-000278, p. 59.

¹⁵⁴ Testimony of Cmdr. Darryl MacDonald, Roundtable: Emergency Communications and Interoperability Among Agencies, June 23, 2022, COMM0059341, p. 49, lines 7-15.

Roundtable panelist Darryl MacDonald discussed the pitfalls of relying on telephone to communicate between agencies, including that doing so “takes time”.¹⁵⁵ Significantly, when information is relayed by phone, only two people get the relevant information, which makes it “very hard to disseminate that information outside.”¹⁵⁶

124. Expert perspectives before the Commission have identified the CAD system as the most efficient way to share information in real time during a critical incident.¹⁵⁷ However, police agencies and other emergency services in Nova Scotia use different CAD systems, which are not interoperable.¹⁵⁸ Some municipal agencies such as Truro Police Service have no CAD system available to their dispatchers or members.¹⁵⁹
125. Further, the lack of a uniform records management system is an additional barrier to interoperability and the timely sharing of information during a critical incident. Police agencies in Nova Scotia use three different records management systems: HRP and Halifax District RCMP use Versadex; CBRPS uses Niche,¹⁶⁰ and the RCMP and all other municipal police agencies use the Police Reporting and Occurrence System (PROS). During an emergency, this poses an additional obstacle that creates delays in obtaining important information.¹⁶¹

The NPF requests that the Commission recommend that the Province of Nova Scotia lead a collaborative initiative involving all public safety agencies, similar to that used to develop the TMR2 radio system, to achieve records and communications interoperability between all police agencies, including to adopt:

- a. **A common CAD system, or CAD systems that are interoperable, so that accurate information can be shared and accessed easily between public safety agencies in real time as a critical incident unfolds; and**
- b. **A provincial standard requiring all police agencies in Nova Scotia to operate on PROS, or another common records management system.**

¹⁵⁵ Testimony of Cmdr. MacDonald, Roundtable: Interoperability, COMM0059341, p. 49, lines 7-15.

¹⁵⁶ Testimony of Cmdr. MacDonald, Roundtable: Interoperability, COMM0059341, p. 66, lines 20-23.

¹⁵⁷ Testimony of Cmdr. MacDonald, Roundtable: Interoperability, COMM0059341, p. 66-67.

¹⁵⁸ Testimony of Todd Brown and Cmdr. MacDonald, Roundtable: Interoperability, COMM0059341, p. 47-50; Testimony of Darryl MacDonald, COMM0059341, p. 119, lines 9-12, 23-25; p. 122, lines 7-9.

¹⁵⁹ Testimony of Chief Dave MacNeil, June 6, 2022, COMM0058947, p. 95; Testimony of Cmdr. MacDonald, Roundtable: Interoperability, COMM0059341, p. 47, lines 18-19.

¹⁶⁰ Mass Casualty Commission - Transcript of Interview with Chief Robert Walsh, COMM0064904, p. 7.

¹⁶¹ *Command Decisions*, COMM0057771, Exhibit P-005459, para 368, 412. See also Testimony of Chief Dwayne Pike, Roundtable: Interoperability, COMM0059341, p. 64, lines 26-28.

VII. SUPPORT FOR THE CRITICAL INCIDENT RESPONSE

126. Members responsible for commanding the critical incident response faced a “firehose” of information while trying to understand an unfolding and unprecedented crime, where the perpetrator had multiple tactical advantages. These circumstances put unreasonable pressures on individual Members to process, analyze, and communicate information, while making critical decisions.
127. This incident highlighted the limitations of the command post as currently resourced. The Commission should recommend the creation of additional dedicated roles within a command post to improve critical incident response during highly complex or prolonged incidents, as well as additional best practices to better prepare Members for the next event.
- A. Dispatcher embedded in the command post
128. The critical incident package that was deployed in response to the mass casualty on April 18-19, 2020, did not include an OCC resource dedicated to feeding information from the radio or CAD entries to the CIC.¹⁶² A dispatcher embedded in the command post tasked with monitoring radio traffic and dispatch logs could help ensure that key information is captured and transmitted to the Critical Incident Commander in a timely manner, for their situational awareness and so that it may be actioned as appropriate.¹⁶³
129. In a number of instances during the mass casualty, the CIC was not made aware of information transmitted over the radio or received from 911 callers that could have informed his situational awareness or allowed for more timely decision-making. Examples include the shooting of Andrew MacDonald,¹⁶⁴ Cst. Colford’s transmission about another possible way out of Portapique,¹⁶⁵ precise descriptions offered by Jamie Blair and the Blair and McCully children of the perpetrator’s vehicle, and Cst. Fahie’s transmission about the push bar on the perpetrator’s replica police cruiser.¹⁶⁶

¹⁶² As is done in Toronto Police Services: Testimony of Kerry Murray-Bates, June 1, 2022, COMM0058945, p. 36, lines 5-6, 12-13, p. 37, lines 16-17.

¹⁶³ Testimony of S/Sgt. MacCallum, COMM0058948, p. 191, lines 18-23.

¹⁶⁴ *Command Decisions*, COMM0057771, P-001461, para 307; Testimony of S/Sgt. Jeff West and S/Sgt. Kevin Surette, May 18, 2022, COMM0058603, p. 111; Testimony of S/Sgt. Halliday, COMM0058514, p. 53, lines 26-28, p. 54, line 1; Testimony of S/Sgt. MacCallum, COMM0058948, p. 191, lines 2-28; Testimony of S/Sgt. Carroll, COMM0058601, p. 80, lines 16-28.

¹⁶⁵ *Command Decisions*, COMM0057771, P-001461, para 101; Testimony of S/Sgt. MacCallum, COMM0058948, p. 225, lines 10-16; Testimony of S/Sgt. Halliday, COMM0058514, p. 80, lines 17-25.

¹⁶⁶ Testimony of Cst. Ian Fahie, May 5, 2022, COMM0057389, p. 114, lines 4-13.

130. It is inevitable that heavily tasked Risk Managers or senior NCOs in the command post will not hear all radio transmissions, creating missed opportunities to relay information to the CIC. A number of witnesses have highlighted that having a dedicated resource within the Command Post to monitor radio traffic and dispatch logs could better ensure that key information is captured, investigated, and actioned as appropriate.¹⁶⁷
131. The Commission also heard evidence that other police agencies, such as Toronto Police Service, have adopted a practice of embedding a communications operator in its Major Incident Command Centre, to ensure that the CIC has all the information in the CAD system "so everyone is getting the same information at the same time."¹⁶⁸

The NPF requests that the Commission recommend that an OCC dispatcher be deployed to the command post as part of the critical incident package, dedicated to monitoring radio traffic and dispatch logs and feeding information to the CIC to ensure that key information is captured, investigated, and actioned as appropriate.

B. Criminal intelligence analysts and investigators embedded in the command post

132. Numerous witnesses likened the flow of information during the mass casualty to "drinking from a fire hose".¹⁶⁹ Members were faced with a large volume of information from a variety of sources, including 911 calls, Members on scene, and other agencies. The RCMP's critical incident package, however, currently does not include dedicated analysts to objectively synthesize that information and draw connections or identify patterns to support the critical incident response.
133. The deployment of trained criminal intelligence analysts to review, collate, and interpret the information flowing to the command team from various sources would have greatly assisted the response on April 18-19, 2020.¹⁷⁰ Had an analyst been available to review the audio of the initial 911 calls from Jamie Blair and the Blair and McCully children, for example, the CIC may have been able to develop a more precise understanding of the perpetrator's vehicle descriptions at an earlier stage.

¹⁶⁷ Testimony of S/Sgt. MacCallum, COMM0058948, p. 191, lines 18-23.

¹⁶⁸ Testimony of Kerry Murray-Bates, COMM0058945, p. 36, lines 10-17.

¹⁶⁹ Mass Casualty Commission - Transcript of Interview with C/Supt. Darren Campbell, June 28, 2022, COMM0059133, p. 10; Testimony of S/Sgt. Brian Rehill, May 30, 2022, COMM0058857, p. 159, lines 10-22; Testimony of S/Sgt. Bruce Briers, May 28, 2022, COMM0058601, p. 49, lines 15-17.

¹⁷⁰ Mass Casualty Commission - Transcript of Interview with C/Supt. Chris Leather, July 6, 2022, COMM0059832, Exhibit P-003892, p. 32-33, 35.

134. Investigators from the Major Crime Unit (“MCU”) should also be deployed to the command post from the beginning of the critical incident, in order to pursue investigative leads identified by analysts or members of the command team in a coordinated and timely way. The evidence before the Commission supports the valuable role that trained investigators can play in gaining situational awareness and responding to a critical incident. For example, GIS Members Cst. Brown and Cst. Melanson, who were called in to assist in the early morning hours of April 19, 2020, obtained key information from Lisa Banfield that allowed Members to confirm that the perpetrator was likely still driving a replica police cruiser.

The NPF requests that the Commission recommend that one or more trained analysts and MCU investigators be deployed as part of the critical incident package to review and analyse intelligence such as early 911 calls, and pursue resulting investigative leads, in support of the critical incident response.

C. Strategic communications professional embedded in the command post

135. During the mass casualty, the critical incident package did not include a dedicated communications professional to facilitate regular updates to the public. The evidence shows that Members in the Strategic Communications Unit experienced difficulties reaching Members at the Command Post who were actively engaged in the critical incident response, which contributed to delays in issuing public communications via social media.¹⁷¹ To address this issue, the RCMP OCC has since developed protocols for the immediate engagement of strategic communications during a critical incident.

The NPF asks that the Commission recommend embedding a communications professional within the command post from an early stage of a critical incident to ensure timely and accurate communication to the public, by reducing opportunities for delays in communication and gaps in information or understanding.

D. Additional scribes for Risk Managers and key members of the command team

136. The evidence reveals the important role scribes play in freeing Members’ attention to focus on necessary tasks, and in ensuring the completeness and accuracy of records of

¹⁷¹ RCMP Public Communications, April 18-19, 2020 [“Public Communications”], COMM0058836, P-002001, paras 91, 93-95.

decisions.¹⁷² Currently, however, scribes are only assigned to the CIC, and not to other key Members in the command triangle or to the Risk Manager.¹⁷³

The NPF requests that the Commission recommend that in major critical incidents, additional scribes be deployed to support Risk Managers and other members of the command triangle, such as the Tactical Operations Officer.

E. Second Risk Manager for major critical incidents

137. The Commission has learned that, since the mass casualty, "H" Division OCC has developed a protocol to call in a second Risk Manager in major critical incidents.¹⁷⁴ The availability of one Risk Manager to focus on directing direct general duty resources allows the second Risk Manager to remain free to support the CIC with taskings such as liaising with other agencies and securing resources such as air support.

The NPF requests that the Commission endorse as a best practice that a second Risk Manager be called in to support the CIC in major critical incidents.

F. Regular updates to Members to promote Member safety

138. Officer safety requires that Members have accurate and up-to-date information necessary to their situational awareness and assessment of risk, including information on suspect identity, vehicle descriptions, last known location or direction of travel, and potential firearms. A conscious effort must be made to disseminate this key information directly to Members in a timely manner throughout the critical incident.

139. During the mass casualty, frontline Members were generally updated via radio, CAD entries, and BOLOs; however, resource limitations and factors inherent in critical incidents and outside of Members' control constrained their awareness of important information in some cases. For example, radio traffic was heavy, transmissions were at times unclear or delayed, and important information is easily missed when a Member's attention is diverted to another task, such as driving, assisting or interviewing a civilian, or communicating with another Member.

¹⁷² Testimony of Wallace Gossen, June 1, 2022, COMM0058945, p. 51, lines 1-2, p. 52, lines 2-25; Testimony of S/Sgt. Halliday, COMM0058514, p. 130, lines 17-22.

¹⁷³ Testimony of S/Sgt. Halliday, COMM0058514, p. 130, lines 17-22.

¹⁷⁴ OCC Enhancements and Initiatives – Following the April 2020 Incident, COMM0063066; Affidavit and supporting materials of Pharanae Croistiere, COMM62461, Exhibit P-004158, p. 81; RCMP H Division Response to Subpoena, COMM0059949, Exhibit P-003952, p. 11.

140. Repeating a summary of the most up-to-date and key information through all-Member radio broadcasts and CAD entries at regular intervals (e.g. hourly) can offer an effective way to ensure that Members coming on shift, or who may have missed an earlier transmission, are able to quickly gain situational awareness. The evidence before the Commission shows that the practical recommendation of the MacNeil Report to ensure that a supervisor provide clear direction regarding equipment use was fully implemented on April 18-19, 2020, and was effective.¹⁷⁵ A similar approach could be employed to ensure that Members have the most up-to-date information relevant to situational awareness and risk assessment, to promote officer safety.

The Commission should accordingly recommend that, during a critical incident, a summary of key up-to-date information necessary to allow Members to maintain situational awareness and assess risk be broadcast over the radio and through the CAD system, at regular intervals.

G. Ongoing training regarding command and control of the critical incident

141. Effective January 12, 2022, H Division adopted a new policy to govern critical incidents, which makes explicit that the Risk Manager may assume control of the incident until the critical incident commander is in a position to assume command and control.¹⁷⁶ This policy replaces OM 33.100 Critical Incidents, which was in effect at the time of the mass casualty. This new policy resolves the policy ambiguity between the former OM 33.100 and the H-Division Risk Manager Program document regarding the command structure during the early stages of a critical incident, highlighted by the NPF in its Phase 1 submissions.¹⁷⁷

¹⁷⁵ MacNeil Report, COMM0050843, Exhibit P-001629, Recommendation 5.6, p.104; e.g., Colchester Radio Transcript, April 19, 2020, COMM0003806, Exhibit P-000054, line 312.

¹⁷⁶ "H Division Tactical Operations Manual ch. 7.1 - Critical Incident Program Activation", Jan. 12, 2022, COMM0059130, Exhibit P-003935.

¹⁷⁷ "H Division Operational Manual, ch 33.100 Critical Incidents", October 14, 2010, COMM0018406, Exhibit P-001555, s. 3.7; "H Division Risk Manager Program", September 7, 2021, COMM0043160, Exhibit P-001575, p. 2. See also "H Division OCC Risk Manager Roles and Responsibilities", 2017, COMM0018416, Exhibit P-001557, p. 2 [emphasis added]; Testimony of S/Sgt. MacCallum, COMM0058948, p. 181, lines 13-14; Testimony of S/Sgt. Bruce Briers, May 25, 2022, COMM0058605, p. 25 lines 21-28, p. 26, lines 1-3; Testimony of Sgt. O'Brien, COMM0058858, p. 13, lines 12-28; p. 74, lines 5-10; Sgt. Andrew O'Brien Answers to Questions, COMM0046250, Exhibit P-001578, Question 5 and 5(b).

142. Experience shows that policies are of little value if they are not known and understood. The MacNeil Report recommended that the RCMP provide training to prepare supervisors to manage and supervise throughout a critical incident until a CIC assumes command.

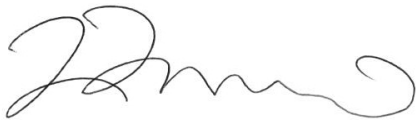
The Commission should recommend that the RCMP continue to provide regular training on the command structure to frontline supervisors and general duty Members, to ensure that Members remain knowledgeable about recent changes in the policy governing the command and control of critical incidents.

IMPLEMENTATION OF RECOMMENDATIONS

143. If the Commission's recommendations are to make our communities safer in the future, they must be implemented. The NPF is committed to ensuring that the RCMP makes necessary changes to improve officer safety and public safety, and will use its position as the sole certified bargaining agent for RCMP Members to do so.
144. To the extent that the Commission contemplates the creation of any formal means by which the implementation of its recommendations will be monitored, the NPF respectfully requests to be included in that process as a key stakeholder.

ALL OF WHICH IS RESPECTFULLY SUBMITTED,

NIJHAWAN MCMILLAN BARRISTERS



Nasha Nijhawan



Kelly McMillan

Appendix A
SUMMARY OF NPF PROPOSED RECOMMENDATIONS

I. REVIEW OF POLICE RESOURCING IN NOVA SCOTIA	
1	The Province of Nova Scotia discontinue the use of the “per officer” funding formula as a basis for cost recovery from municipalities policed by the RCMP under the PPSA, and conduct a review of its police resourcing models and funding formula, to allow for the identification and maintenance of an effective level of police personnel and resources in Nova Scotia.
2	The Province, RCMP and municipal forces enter into formal cost-recovery agreements with respect to the provision of specialized services outside of RCMP contract jurisdiction.
3	<p>The Province of Nova Scotia identify and support municipalities to maintain a minimum police strength in Nova Scotia that:</p> <ul style="list-style-type: none"> a. Is effective for Nova Scotia’s current population; b. Maintains 24-hour service coverage across the province; c. Permits Members to respond rapidly to calls for service, with consideration for the vast geographic areas of rural Nova Scotia, road conditions, weather systems, and other obstacles; d. Is informed not only by trends in crime reporting, but also by other community needs and expectations; e. Enables Members to respond with a partner in dangerous situations, in calls for service where the presence of firearms is likely, and for other tasks requiring both communication and security roles (e.g., containment); f. Allows for proactive policing assignments that enable personnel to engage in consistent community policing activities and establish and maintain situated local knowledge; and g. Factors in “worst case scenario” and critical incident planning and preparedness.

II. IMPLEMENTATION OF COMPREHENSIVE POLICING STANDARDS	
4	The Province of Nova Scotia and RCMP immediately provide permanent stable funding for, and staff in “H” Division: <ul style="list-style-type: none"> a. 24 full-time ERT Members; b. One full-time EMRT Member in a coordinator and operational role; and c. Four full-time Police Dog Services positions.
5	The Province of Nova Scotia adopt comprehensive, modern, and substantive provincial standards across all areas of police service delivery, including training, equipment, technology, specialized services, records management, administration, and operations, as developed by the provincial working group.
6	The Province enforce minimum levels of service delivery by requiring all agencies to have formal agreements for the provision of all necessary specialized services that they do not offer.
7	Provincial policing standards, including training standards, be reviewed regularly, and no less than every three years, to ensure they continue to meet legal requirements and best practices based on learning in police science, and expectations for adequate, consistent police service delivery and interoperability.
8	The Province conduct audits and evaluations of police services based on provincial standards.
III. ENHANCED SUPPORT FOR MEMBER MENTAL HEALTH	
9	The RCMP take steps to address organizational stressors which contribute to the risk of OSI in its Members. In particular, the Commission should recommend that the RCMP must provide: <ul style="list-style-type: none"> a. Policy for the temporary modification of regular duties to allow for appropriate individual or team reintegration or recovery from a critical incident, <i>without</i> going “off duty sick” or first being deemed medically unfit for regular duties; b. Adequate staffing to reduce burnout and permit administrative, medical or other leaves necessary to promote wellness; and

	<ul style="list-style-type: none"> c. Enhanced mental health training for supervisors and officers, to promote cultural change.
10	<p>Improve critical incident aftercare for Members, including:</p> <ul style="list-style-type: none"> a. Ensuring sufficient, appropriately trained resources are available to conduct CISD; b. Following up in a structured manner with all involved Members, to ensure they are receiving the support they need after the CISD, including one on one counseling; and c. Improving effectiveness of formal peer support programs through appropriate training, staffing and resourcing, and ensuring that the approach to peer support is evidence-based.
11	<p>The RCMP provide evidence-based training and peer support to spouses and families of RCMP Members, recognizing the role they play in supporting Member wellness and the vicarious trauma they experience.</p>
IV. MULTI-AGENCY SUPPORT FOR VICTIMS AND FAMILIES	
12	<p>The RCMP and municipal police agencies in Nova Scotia establish policies to define the role of FLOs following a mass casualty or comparable critical incidents, which is to identify victims and crime scenes, perform investigative tasks in support of the reunification of victims with family members, and facilitate the sharing of timely and accurate information about the mass casualty event and subsequent investigation with victims and families.</p>
13	<p>The RCMP and municipal police agencies in Nova Scotia establish protocols to guide the training and work of FLOs.</p>
14	<p>The RCMP and municipal police agencies review existing policies and protocols applicable to critical incidents to provide for the activation of FLOs as part of the critical incident package in mass casualty events, and to ensure that an adequate team of dedicated FLOs are trained and available in the event of a mass casualty or comparable critical incident.</p>

15	The Province of Nova Scotia, in coordination with the RCMP and municipal police agencies, establish a dedicated 1-800 number for families to share and seek information about missing relatives during a mass casualty event, and provide appropriate public education about the 1-800 number.
16	The Province of Nova Scotia formalize its integrated support model to ensure appropriately resourced, seamless delivery of wraparound services to victims and families following a mass casualty event.

V. AN EMERGENCY AIR SUPPORT STRATEGY FOR THE ATLANTIC REGION

17	<p>The four Atlantic provinces and the Government of Canada develop and implement an Emergency Air Services Strategy, to ensure that air support is available to all police services in Atlantic Canada during critical incidents, including active shooter situations. This strategy must:</p> <ul style="list-style-type: none"> a. Ensure that all police services in Atlantic Canada have formal agreements to access either RCMP ARAS or other air support resources at any time; b. Consider the various purposes for which police may require air support, including (but not limited to) transport of specialised personnel, surveillance, or active shooter cover; c. Ensure that as a top tier of air support, police in Atlantic Canada have access at any time on an urgent basis to an aircraft and pilot which are capable of flying at night, and during an active shooter situation, equipped with thermal imaging technology and other search and rescue equipment; d. Allow for collaboration between police and other emergency response agencies to share access to civilian agency or private aircraft, for efficient allocation and shared funding of resources; e. Provide for clear policies and procedures to rapidly access air support throughout the Atlantic provinces, depending on police requirements and for all partner agencies, and ensure that critical incident commanders and police dispatchers are trained to request these services; and f. Ensure that RCMP ARAS or other air support resources that form part of the regional strategy are resourced to ensure sufficient aircraft,
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	<p>pilots, and maintenance personnel, to offer support 24 hours per day/365 days per year.</p>
<p>VI. TECHNOLOGY FOR SITUTATIONAL AWARENESS AND INTEROPERABILITY</p>	
<p>18</p>	<p>The RCMP acquire and implement technology necessary to:</p> <ul style="list-style-type: none"> a. Immediately equip all specialized and unmarked vehicles (e.g., ERT, EMRT, PDS, TAV, GIS, FIS) be equipped with MWS; b. As soon as possible and no later than December 2023, equip the OCC/CIC and all Members with, and train all Members in the use of, GPS and mapping technology to allow them to be tracked and monitored in and out of their vehicles in real time, such as the Android Tactical Assault Kit (ATAK) system and/or a GPS-enabled portable radio system that integrates with CIIDS; and c. Integrate the computer aided dispatching systems used in its operational communications centres, such as by establishing a “super agency” CAD, to enable the tracking and monitoring of Members across provincial borders.
<p>19</p>	<p>The Province of Nova Scotia:</p> <ul style="list-style-type: none"> a. Consult with the RCMP and municipal police agencies to develop a procurement strategy for the adoption of technology that allows for a common operating picture and situational awareness during a multi-agency response; and b. Adopt a provincial standard requiring, at a minimum, that all municipal police agencies in Nova Scotia adopt GPS and mapping technology to allow their general duty and specialist members to be tracked and monitored by their dispatchers both in and out of their vehicles, in real time.

20	<p>The RCMP and all municipal police agencies in Nova Scotia:</p> <ul style="list-style-type: none"> a. Adopt and maintain up-to-date satellite mapping technology, such as Pictometry, capable of providing high-resolution images of all areas within their policing jurisdictions; and b. Provide training to Critical Incident Commanders, Risk Managers, dispatchers, and frontline supervisors on the use and functionality of the mapping technology, which should be refreshed on an annual basis.
21	<p>The Province of Nova Scotia lead a collaborative initiative involving all public safety agencies, similar to that used to develop the TMR2 radio system, to achieve records and communications interoperability between all police agencies, including to adopt:</p> <ul style="list-style-type: none"> a. A common CAD system, or CAD systems that are interoperable, so that accurate information can be shared and accessed easily between public safety agencies in real time as a critical incident unfolds; and b. A provincial standard requiring all police agencies in Nova Scotia to operate on PROS, or another common records management system.
VII. RESOURCES TO SUPPORT CRITICAL INCIDENT COMMANDERS	
22	<p>An OCC dispatcher be deployed to the command post as part of the critical incident package, dedicated to monitoring radio traffic and dispatch logs and feeding information to the CIC to ensure that key information is captured, investigated, and actioned as appropriate.</p>
23	<p>One or more trained analysts and MCU investigators be deployed as part of the critical incident package to review and analyse intelligence such as early 911 calls, and pursue resulting investigative leads, in support of the critical incident response.</p>
24	<p>A communications professional be embedded within the command post from an early stage of a critical incident to ensure timely and accurate communication to the public, by reducing opportunities for delays in communication and gaps in information or understanding.</p>

25	In major critical incidents, additional scribes be deployed to support Risk Managers and other members of the command triangle, such as the Tactical Operations Officer.
26	Endorse as a best practice that a second Risk Manager be called in to support the CIC in major critical incidents.
27	During a critical incident, a summary of key up-to-date information necessary to allow Members to maintain situational awareness and assess risk be broadcast over the radio and through the CAD system, at regular intervals.
28	The RCMP continue to provide regular training on the command structure to frontline supervisors and general duty Members, to ensure that Members remain knowledgeable about recent changes in the policy governing the command of critical incidents.