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Dear Commissioners:

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**RE: Final Submissions
Our File: CAT-1155**

The following are the final written submissions on behalf of the Truro Police Service ("TPS").

Introduction

The TPS is the municipal police force for the Town of Truro, one of ten municipal police forces in Nova Scotia. Established in 1875, the TPS has a long and proud history of serving the residents of Truro.

The Town of Truro has a population of approximately 13,000. It serves as the regional centre for a much greater population from Colchester County and beyond, drawing in people from the surrounding area for banking, professional services, medical care, education, shopping and restaurants. It is also known as the "hub" of Nova Scotia because of its location at the convergence of Highway 102 and Highway 104, meaning that almost everyone who enters, leaves, or passes through Nova Scotia passes by or through the town.

The TPS is composed of 36 officers and 15 civilian employees. Aside from Cape Breton Regional Police ("CBRP") and Halifax Regional Police ("HRP"), the TPS is the largest municipal police force in Nova Scotia.¹ As such, in the words of TPS Chief David MacNeil, "Truro is in a bit of a unique spot. We're too small to be big, we're too big to be small." The TPS does not have the resources of the larger forces of the HRP and CBRP but does have its own special services sections in a number of areas that some other smaller municipal forces do not, such as canine, forensic identification and detective section.²

Truro is located approximately 40 kilometres from Portapique and 50 kilometres from Wentworth. It is a central part of the greater Colchester County community. Many residents of

¹ Barry McKnight, *The Structure of Policing in Nova Scotia in April 2020*, pages 47 to 54, COMM0040450.

² Interview of Chief David MacNeil, August 3, 2021, page 6, COMM0003767.

Truro knew one or more victims of the mass casualty and family and friends of the victims, and the impacts of the mass casualty have hit Truro extremely hard. The TPS and its members have been impacted by the mass casualty. The TPS expresses its sorrow and condolences to the families who lost loved ones because of the senseless and horrendous actions of the perpetrator.

These submissions will focus on several issues that have arisen over the course of Commission proceedings that involve or affect the TPS and will address ideas for changes to the structure of policing in Nova Scotia.

Ability of TPS to assist in mass casualty event and aftermath

Since the mass casualty, many have questioned why the RCMP did not ask the TPS for assistance during the mass casualty on April 18 and 19, 2020 and afterward. There have been several reasons suggested in media reports and by some during the Commission proceedings – it has been suggested that the TPS did not have adequate equipment, adequate training, and/or insufficient personnel to assist. It has also been suggested that radio communications between the TPS and RCMP members were not possible or not secure. It has been suggested that the TPS was subject to inadequate or non-existent policing standards.

These questions about the ability and capacity of the TPS to assist in the mass casualty have had an impact on the TPS and residents of Truro, because they suggest that the TPS does not have the competence and ability to keep the Town and its residents safe.

The evidence that has been provided to this Commission has shown that none of the suggested deficiencies in the TPS are accurate – the TPS is capable, competent, well resourced and well trained, and that was the case in April 2020 as well as today.

In April 2020:

- a) The TPS had the equipment necessary to assist in dealing with active shooters, including carbines, hard body armour, and ballistic vests.³
- b) The TPS had policies in place specifically to deal with active shooter threats.⁴
- c) TPS officers had regular training in firearms and in dealing with active shooter events through in-house training and external courses, as shown in the TPS training records related to weapons and active shooter training,⁵ including an Active Shooter Management course in December, 2018.⁶

³ Interview of Sgt. Rick Hickox, February 22, 2022, page 16, COMM0053760.

⁴ Interview of Chief David MacNeil, August 3, 2021, pages 40 to 42, COMM0003767.

⁵ TPS training materials and documentation, COMM0001665.

⁶ TPS training materials and documentation, page 43, COMM0001665.

- d) TPS officers had the ability to communicate with RCMP via radios and had 6 portable encrypted radios it could have deployed with its officers if necessary.⁷ At present, all TPS radios are encrypted.⁸
- e) The TPS did not have many officers on duty during night of April 18/19 but could have called in several more (between 12 to 18) quickly and easily to assist.⁹
- f) The TPS followed the existing Nova Scotia Department of Justice policing standards and had its own policies in place that governed its operations.¹⁰

If the TPS had been called upon, it was capable and ready to assist during the mass casualty event and afterwards. In the view of the TPS, not engaging the TPS during the mass casualty was a missed opportunity to make use of all police resources that were available to stop the perpetrator as quickly as possible. Even if the TPS were not called to provide officers to assist in Portapique during the night of April 18/19 or in active pursuit of the perpetrator on the 19, the TPS could have assisted in several other ways, including the following by way of examples:

- a) Establishing check points or roadblocks on Highway 2 and Highway 102 in Onslow, which were the only significant access points to Truro and Halifax, and on Highway 104, the major highway leading to eastern Nova Scotia and Cape Breton;
- b) Assisting in inspecting and securing crime scenes in Portapique and elsewhere, alleviating the delay that occurred in identifying some crime scenes and victims;
- c) Responding to routine calls in Colchester County, freeing up RCMP members to respond to the perpetrator.

Policing Standards

It has been suggested to the Commission that there are no provincial policing standards in Nova Scotia. This is not correct – there are provincial policing standards, addressing a wide range of issues such as training, records management, and firearms.¹¹ However, policing agencies in the province and the provincial Department of Justice have recognized that these standards are dated and need to be updated.

The TPS has been interested in updating the provincial standards for several years, but efforts to update the standards were hampered at least in part because of delays and changes in personnel at Justice.¹² In 2021, Justice re-initiated a process to update the standards, which is

⁷ Interview of Insp. Darrin Smith, May 18, 2022, page 10, COMM0058529.

⁸ Interview of Chief David MacNeil, August 3, 2021, pages 27 to 28, COMM0003767.

⁹ Interview of Deputy Chief Robert Hearn, May 24, 2022, page 10, COMM0059098.

¹⁰ TPS Standard Operational Procedures, COMM0035935.

¹¹ Barry McKnight, *The Structure of Policing in Nova Scotia in April 2020*, pages 72 to 77, COMM0040450.

¹² Interview of Chief David MacNeil, August 3, 2021, page 68, COMM0003767.

ongoing. Several stakeholders are participating in the project, including Justice, the RCMP and municipal police forces. Both the Chief and Deputy Chief of the TPS are involved in this work.¹³ While the current target date for the updated standards seems to be a bit unclear, they are expected to be completed in the near future.

With respect to the TPS specifically, as stated above the TPS has developed its own policies that it uses for its operations. Chief MacNeil described these policies during his interview with the Commission, explaining how TPS senior leadership developed the policies in 2016.¹⁴

The TPS submits that while policing standards are important, to some extent provincial policing standards are a distraction from more serious issues facing the Commission in its work. Provincial standards were not the problem during the mass casualty. The RCMP has stated on several occasions that although it found the provincial standards inadequate, the RCMP has its own rigorous standards that it follows. Accordingly, the provincial standards, whether adequate or not, did not play a part in the way RCMP handled events on April 18 and 19.

Provincial policing standards are also not the reason the RCMP did not call in the TPS to assist during the mass casualty. While there has been some suggestion that inadequate provincial standards affect the ability of TPS (and other municipal police officers) and RCMP officers to work together, there is no evidence that this was a consideration during the mass casualty. On the other hand, in the years before the mass casualty, there were many incidents in which the TPS did assist the RCMP. This assistance included two incidents, one in 2016 and another in 2018, where the TPS assisted Colchester County RCMP in critical incidents involving weapons.¹⁵

As stated, while provincial policing standards are important, TPS has a concern that standards may have become too large a focus in Commission proceedings. While the provincial standards needed to be updated, that was not a problem that contributed to the mass casualty, and it is an issue that is being addressed by all stakeholders in the development of new standards that will apply provincewide. Accordingly, the TPS urges the Commission not to place undue focus or emphasis on policing standards in its final report.

Training

Similar to policing standards, training has become a significant issue in the Commission proceedings, and training is obviously important. However, it is simplistic to say more training is always good or that it will in itself solve the problems exposed during the Commission.

¹³ Interview of Chief David MacNeil, August 3, 2021, pages 68 to 70, COMM0003767, and Interview of Hayley Crichton, January 24, 2022, pages 30 to 32, COMM0051428.

¹⁴ Interview of Chief David MacNeil, August 3, 2021, pages 70 to 72, COMM0003767.

¹⁵ Document of Assistance to the RCMP, page 6, COMM0054260.

As stated, TPS officers are highly trained and would have been able to assist in the response to the mass casualty. Various TPS officers described TPS training in Commission interviews, and TPS training records have been supplied to the Commission.¹⁶

Another theme in the Commission proceedings is the need for common training involving RCMP and municipal police agencies. The TPS agrees that this is useful and points out that common training happens currently and has happened for many years. The TPS and other municipal forces do shared training with each other and with RCMP in a number of ways:

- a) It is common for a municipal agency to arrange for a training program and open up seats for that training to officers from other agencies – for example, former Kentville Police Chief Julia Cecchetto outlined the cooperative training among municipal agencies in her Commission interview.¹⁷ Barry McKnight in his report also describes the cooperative relationship among police agencies in hosting training courses.¹⁸
- b) There is also regular joint training involving both RCMP and municipal forces. RCMP Superintendent Darren Campbell spoke to this in his interview, describing formal and informal joint training between the RCMP and municipal services.¹⁹
- c) The provincial Department of Justice, Public Safety Division also provides or facilitates training courses that are open to all municipal services and the RCMP.²⁰
- d) The TPS and other municipal forces also regularly send officers for specialized training to the Canadian Police College, where they get the same training as RCMP members and officers from other police services. The TPS, for example, sends its officers working in specialized sections such as major crimes or drugs to the Canadian Police College for specific and advanced training in those areas.²¹ During the testimony of Chief Superintendent Chris Leather at the Commission, Commissioner Fitch noted:

So we know that general duty constables from across Canada go through similar forms and lengths of training, whether municipal, provincial, or federal, and a lot of the specialised training, for example, forensic identifications, explosive disposal, critical incident command, and so forth, are housed out of Canadian Police College, so your municipal agencies are getting the same training, the same certification as the RCMP officers.²²

¹⁶ TPS training materials and documentation, COMM0001665, and COMM0057419 to COMM0057506.

¹⁷ Interview of Julia Cecchetto and James Butler, August 31, 2021, pages 9 and 10, COMM0015891.

¹⁸ Barry McKnight, *The Structure of Policing in Nova Scotia in April 2020*, page 60, COMM0040450.

¹⁹ Interview of Superintendent Darren Campbell, June 28, 2022, page 105, COMM0059847.

²⁰ Interview of Hayley Crichton, January 24, 2022, pages 48 to 50, COMM0051428.

²¹ Interview of Chief David MacNeil, August 3, 2021, page 35, COMM0003767.

²² Transcript of Public Hearing, Volume 57, July 28, 2022, page 159, lines 9 to 14.

Although there is substantial joint training now, TPS agrees that it would be beneficial to have more joint training with RCMP and other municipal forces.

In general, while increased training is good, added training requirements could also have drawbacks and unintended consequences for police agencies in a couple of ways:

- a) The cost impact of additional training. Training is expensive – there is the expense of attending the training program itself plus travel and other direct costs, and salaries paid to officers while they are on training. It is common ground that policing is increasingly expensive and that resources and police budgets are limited, regardless of the police agency involved, so the costs of additional training could have a significant impact on police agencies.
- b) Training also requires another scarce resource – time. The Commission has heard that officers spend a lot of time on tasks that take them away from their regular duties of front-line policing. The amount of training currently undertaken by officers is significant. Chief Superintendent Leather spoke to the demands of training in his testimony, stating:

...I tried to refer to that [ongoing training] in my testimony yesterday about the sheer volume of those courses, and the constant need to be prioritising them, because otherwise, you end up with a list of 30 to 40 courses that we expect our members to be taking, and to be refreshed on every year or two years, and it becomes daunting and overwhelming.²³

Therefore, **any recommendations on training must be realistic and well thought out, and recognize the costs, financial and otherwise, of increased training.**

Given the high cost of training, the finite resources of all police agencies, the benefits of joint training of municipal police officers and RCMP, and the somewhat *ad hoc* nature of joint training at present, the TPS suggests a **recommendation that the Public Safety Division of the Nova Scotia Department of Justice organize and provide more training courses available to municipal officers and RCMP at no charge to the participating police services.** This training was described by Hayley Crichton in her Commission interview – the Public Safety Division currently facilitates training that is open to all ten municipal police services and the RCMP, with seats allocated to police agencies.²⁴

Relationship with RCMP

A narrative has developed during Commission proceedings that the relationship between the TPS and the RCMP is very poor. This is a simplistic conclusion. The Commission heard from Chief MacNeil that the relationship between RCMP and TPS was good for many years, and still is good

²³ Transcript of Public Hearing, Volume 57, July 28, 2022, page 158, lines 15 to 19.

²⁴ Interview of Hayley Crichton, January 24, 2022, page 48, COMM0051428.

on the ground, in the sense that TPS and RCMP officers cooperate with and support each other in many ways in day to day operations.²⁵ As examples, the TPS provided the Commission with a list of occasions that the TPS provided assistance to the RCMP between January 2020 and March 2022, detailing about 120 incidents of TPS officers assisting the RCMP with a wide range of tasks, including assisting in the service of documents, locating missing persons and suspects, searching female prisoners, taking witness statements, and providing canine services.²⁶

The TPS and RCMP also work closely together in a number of integrated units and joint operations such as the Integrated Street Crime Unit. The TPS also has a TPS officer embedded in the RCMP Northeast Nova Major Crimes division. The TPS officer posted to that position in 2020, Bruce Lake, worked with the RCMP in attempting to stop the perpetrator during the mass casualty and participated in the investigation afterward.²⁷ The office for north and northwest mainland Criminal Investigation Service Nova Scotia is located at the TPS station, and is staffed by a TPS officer and an RCMP officer.²⁸

Having said the above, the TPS acknowledges that the relationship with the RCMP has deteriorated in the last couple of years. There are a number of reasons for this.

Individual personalities and relationships have played a large role at the senior management level. For many years during Chief MacNeil's 16-year tenure as Chief of the TPS, the relationship with senior RCMP management in the province was positive. However, in a short period of time in 2019, there was an influx of new senior management at RCMP Nova Scotia headquarters with a new Support Services Officer, Criminal Operations Officer, and Commanding Officer within the span of a few months. For a variety of reasons, the relationship between the leadership of the TPS (and other municipal forces) and this RCMP leadership team was not good.

The mass casualty itself was a factor and created rifts between the TPS and RCMP leadership. The fact that the RCMP did not ask the TPS for assistance during the mass casualty and declined Chief MacNeil's offer of help on the morning of April 19 was a concern to the TPS, as was the response from the RCMP to the offers of assistance from the TPS and other municipal agencies following the mass casualty, when Chief Cecchetto of Kentville organized a list of municipal forces' personnel and resources available to help, which the RCMP turned down.²⁹

The TPS also felt that communications from the RCMP during the mass casualty and afterward were lacking. While there was some limited communication from the RCMP, it was sparse, incomplete, and sometimes contradictory, and did not provide an accurate picture of the severity of the situation or the potential risk to Truro. Some of the difficulties with the information provided to the TPS are set out in a Memorandum to the Commission dated June 1,

²⁵ Interview of Chief David MacNeil, August 3, 2021, page 80, COMM0003767.

²⁶ Document of Assistance to the RCMP, COMM0054260.

²⁷ Interview of Chief David MacNeil, August 3, 2021, pages 18 and 19, COMM0003767.

²⁸ Interview of Chief David MacNeil, August 3, 2021, page 52, COMM0003767.

²⁹ Interview of Julia Cecchetto and James Butler, August 31, 2021, pages 66 and 67, COMM0015891.

2022.³⁰ The difficulties with the timing and content of the communication from the RCMP to the TPS to “shut down the Town” at 10:37 a.m. on April 19, after the perpetrator had already passed through Truro, are set out in paragraph 101 of the TPS Foundational Document.³¹

RCMP actions after the mass casualty also increased friction with the TPS. For example, the RCMP’s handling of the 2011 CISNS bulletin about the perpetrator caused tension. It appears that the RCMP believed the TPS released the bulletin to the media in order to embarrass the RCMP. This is not accurate. The TPS did not choose to release the bulletin – it was legally required to provide it to the media in response to a request under the *Freedom of Information and Protection of Privacy Act* (“FOIPOP”) provisions of the *Nova Scotia Municipal Government Act*, and the TPS notified Chief Superintendent Leather in advance that it had received a FOIPOP request and would be releasing the bulletin as a result.³²

The RCMP leadership’s handling of the 2011 CISNS bulletin in the call in May 2020 with the municipal chiefs of the TPS, Amherst Police and HRP, and follow-up documentation, was also problematic. Along with Chief MacNeil’s concerns,³³ Chief Pike of the Amherst Police Department sensed that the RCMP had concerns about the bulletin being made public,³⁴ and HRP Chief Kinsella’s viewed the RCMP’s actions as “an attempt to generate a narrative around fault finding in other agencies by the RCMP.”³⁵

The differences between the RCMP and the TPS and other municipal forces on use of Alert Ready and messaging regarding its use also caused tensions. In a conference call on April 30, 2022, about Alert Ready, Assistant Commissioner Bergerman and Chief Superintendent Leather asked the municipal chiefs to join the RCMP in its message that the Alert Ready system was flawed, a position the municipal chiefs did not agree with.³⁶

Another issue that has caused difficulties between the leadership of the RCMP and the municipal chiefs has been the specialized services such as forensics, canine and major crimes provided by RCMP to municipal forces. In early 2021, without explanation, the RCMP introduced a form that municipal forces must use to request RCMP assistance, leading to concerns about the purpose and implications of the form. The suggestion that the RCMP is not required to provide specialized services to municipal police forces, that it may not always do so,

³⁰ Memorandum from Charles Thompson to the Commission dated June 1, 2022, pages 1 and 2, COMM0058839.

³¹ Truro Police Service – April 19, 2020 Foundational Document, paragraph 101, COMM0058837.

³² Interview of Chief David MacNeil, August 3, 2021, bottom of page 108 to top of page 109, and page 112, COMM0003767.

³³ Interview of Chief David MacNeil, August 3, 2021, pages 112 and 118, COMM0003767.

³⁴ Interview of Chief Dwayne Pike, January 18, 2022, pages 83 to 86, COMM0051442.

³⁵ Chief Dan Kinsella’s response to the Commission’s July 14, 2022 subpoena, question 79, page 17, COMM0061317.

³⁶ Interview of Chief David MacNeil, August 3, 2021, pages 119 and 120, COMM0003767; Interview of Chief Julia Cecchetto and James Butler, August 31, 2021, pages 72 and 81, COMM0015891; Chief Dan Kinsella’s response to the Commission’s July 14, 2022, subpoena, question 74, pages 15 and 16, COMM0061317.

or that there may be a cost to municipalities, are all stressors on the relationship between municipal forces (including the TPS) and the RCMP leadership.³⁷

The TPS suggests the following recommendations for improving the relationship between the TPS and other municipal forces and the RCMP.

First, **the new and incoming RCMP leadership in Nova Scotia should be directed to make a conscious and concerted effort to improve communication and relationships with the TPS and other municipal forces.** As stated, a large part of the problem in the last couple of years has been a deterioration of the relationship with the senior RCMP leadership team in the province. Superintendent Leather in his testimony stated that it will be positive to have new RCMP leadership with a clean slate and an opportunity to engage with municipal Chiefs without any of the “baggage that we’ve all carried around for the last two years”.³⁸ The TPS is looking forward to productively working with the new RCMP leadership team.

Second, **the RCMP, municipal police forces and the provincial Department of Justice should work to resolve the issue of the RCMP’s provision of special services in a way that is not harmful to municipal police agencies.** Resolving this issue will remove a significant irritant in the relationship between the RCMP and municipal forces. The TPS understands that there are currently some discussions between the provincial government and municipalities involving this issue, which will hopefully result in clarity on charging costs of special services.

The special services issue is complex. For many years the RCMP provided special services to municipal agencies when requested and there was no suggestion that the municipal agency would be required to pay, directly or indirectly, for the service, or that the RCMP might not provide a service when asked. As noted by Barry McKnight in his report, the RCMP’s provision of special services has been seen by municipal forces as part of the RCMP’s obligations as the provincial police force under the Provincial Police Services Agreement (the “PPSA”), for which the RCMP is paid by the provincial government.³⁹

Recently, the province and the RCMP have taken the position that the RCMP is not under any obligation to provide special services to municipal forces.⁴⁰ The TPS submits that the issue is not clear cut. Although there is no formal agreement, there has been a long-standing practice and understanding in Nova Scotia of the RCMP providing special services when needed and at no cost that pre-dates the current PPSA. If that practice and understanding are to change, it should be done in the context of negotiations for the next PPSA, if there is one.

³⁷ Interview of Chief David MacNeil, August 3, 2021, pages 78 to 80, COMM0003767; Interview of Chief Julia Cecchetto and James Butler, August 31, 2021, pages 22 and 23, COMM0015891.

³⁸ Transcript of Public Hearing, Volume 56, July 27, 2022, page 136, line 24 to page 137, line 15.

³⁹ Barry McKnight, The Structure of Policing in Nova Scotia in April 2020, page 46, COMM0040450.

⁴⁰ Interview of Hayley Crichton, January 24, 2022, page 12, COMM0051428.

While the RCMP provides special services to municipal agencies, the TPS and other municipal forces also assist the RCMP routinely at no charge.⁴¹ This needs to be taken into account, especially in the context of some of the municipal forces, like the TPS, that rarely call upon the RCMP for specialized services. According to the record provided by the RCMP of calls for special services from municipal agencies, the TPS requested assistance with special services twice in 2021,⁴² while the TPS provided assistance to the RCMP over 40 times during that year.⁴³

In addition to resolving the issue of the RCMP's provision of special services to municipal forces, or perhaps as part of the solution, **the province should assist municipal agencies through funding and other support to increase the capacity of municipal agencies collectively to develop and share special services with each other.** These special services should be distributed geographically throughout the province. This approach would alleviate the demand on RCMP special services and ensure municipal forces have access to the special services they require.

Structure of Policing in Nova Scotia

The structure of policing is a complex issue, but it is clear that the current structure of policing in Nova Scotia has significant problems and needs to change. The information that has come forward through the Commission proceedings demonstrates this need, and the Commission and other policing reviews that are underway in the province create the opportunity and necessity to assess the current policing structure and look at other approaches. During the testimony of Chief Superintendent Leather before the Commission, Commissioner Stanton asked him about "the suggestion that it's time to discuss a fundamental change in the organization of the RCMP and in policing."⁴⁴ In response, Chief Superintendent Leather stated the following:

As you would know, Commissioner, the Province has initiated a policing review. There's a number of jurisdictions in the province as well in terms of counties that have asked for policing reviews. There's the Commission that's underway. And safe to say that the government, the Provincial Government, probably the Federal Government as well in terms of public safety, are waiting for the results of those reviews because they will include stakeholder engagement with the communities where these reviews are being done in, Halifax, Colchester, Cumberland, the list goes on across the province.

And you don't have to be an academic to recognise that the tides of change are upon us in policing, and I would say, almost frankly, we don't have a choice. I mean, there is going to be a change in policing in this province, and in other provinces, and those reviews will be... In other words, I welcome the reviews because they will be

⁴¹ For example, see the Interview of Chief Julia Cecchetto and James Butler, August 31, 2021, pages 34 to 36, COMM0015891.

⁴² RCMP Request for Action FY 2020-21 to Municipal Police/Partners, COMM0056372.

⁴³ Document of Assistance to the RCMP, pages 3 to 5, COMM0054260.

⁴⁴ Transcript of Public Hearing, Volume 57, July 28, 2022, page 174, lines 11 to 12.

helpful and they will clearly message to us what the expectations of the public are, which would include looking at the modelling of policing in this province, provincial, regional, federal policing, as it is, and that's inevitable. It's occurring as we sit here. And we look forward to the results of those reviews.

But also being given the chance to provide our input, as you're providing me with now in this venue, with our thoughts and input on the good, the bad, and the otherwise with -- and what comes with those different policing models. *I think it's fair to say that the current model is not sustainable*, I've said that two or three times already. But what the end state is, I think that that's exactly what these reviews will tell us, and that's exactly what the government's waiting for in terms of their deliberations on what policing looks like here in the future.⁴⁵ (emphasis added)

The issue of the RCMP providing special services to municipal police agencies is an example of the breakdown in the current structure. After many years of providing special services as part of an informal arrangement, the issue of cost and capacity seems to have arisen because of the increasingly limited resources and budgetary issues faced by the RCMP. Chief Superintendent Leather stated in his Commission interview that the RCMP raised the issue of the cost of those special services and the possibility that the RCMP might not be able to provide them to municipal forces because, following the mass casualty, the RCMP was “struggling to fulfill our own needs” and “we’re not well resourced to provide assistance to external partners.”⁴⁶ The result is uncertainty over cost recovery, whether the RCMP is required to provide special services, and if not, what options are available to municipal forces.

There are several other problems with the current structure of policing in the province, and in particular with the RCMP’s capacity and suitability to provide frontline policing services, including the following:

- a) The RCMP is stretched too thin. Its mandate is too broad, and it is attempting to do too many things in providing federal policing (e.g., drug enforcement, cybercrime, border integrity), national policing services (e.g., the Canadian Police College, Canadian Police Information Centre, Criminal Intelligence Service Canada), and contract policing to municipalities. This issue has been identified by a number of reports in recent years.⁴⁷
- b) For a variety of reasons, the RCMP is not able to make significant changes in the way it operates. Corley and Murphy discuss these reasons at pages 16 to 20 of their report.⁴⁸

⁴⁵ Transcript of Public Hearing, Volume 57, July 28, 2022, page 174, line 16 to page 175, line 10.

⁴⁶ Interview of Chief Superintendent Chris Leather, July 6, 2022, page 86, COMM0059832.

⁴⁷ Chris Murphy and Cal Corley, *Community-Engaged Rural Policing: The Case for Reform and Innovation in Rural RCMP Policing*, page 16, COMM0063515.

⁴⁸ Chris Murphy and Cal Corley, *Community-Engaged Rural Policing: The Case for Reform and Innovation in Rural RCMP Policing*, pages 16 to 20, COMM0063515.

- c) RCMP officers frequently move, meaning there is little continuity and very little familiarity between the officers and the communities (and the members of those communities) that they serve. Darryl Macdonald, OCC Commander of the L Division Operational Communications Centre, stated the following during a Commission roundtable:

The RCMP is in a very difficult situation. We -- our members move around. They move from community to community, from province to province. We don't have the time to establish the relationships perhaps to the level that we would like to do. And so that puts an awful lot of pressure on officers to be able to do community policing...⁴⁹

- d) RCMP special services for the province are centralized in Dartmouth, far from many of the places in the province where they are needed, meaning potential delays and inefficiencies in delivering those special services when and where they are required.
- e) A number of witnesses at the Commission spoke to the trouble the RCMP is having in attracting and retaining officers. The RCMP also has difficulty in back-filling positions where an officer is temporarily out due to illness or injury, parental leave or other reasons. There is also a delay in replacing an officer who gets transferred to another location or position. All of these factors lead to a chronic shortage of front-line officers.

To deal with these problems, the TPS suggests that **the Commission recommend that the Nova Scotia government and municipalities examine other possible policing structures, such as a regional policing model**, which would involve the establishment of a number of regional police forces. This could be achieved through the consolidation and/or the expansion of some existing agencies, or the creation of new agencies. These forces would be community based, but have the size, resources and critical mass to maintain some of their own specialized services such as forensic identification and canine services. Additionally, regional police services would have the ability to pool resources to develop other specialized services such as ERT teams.

This regional policing model would have many benefits:

- a) The regional police services would be local and based in the communities they serve.
- b) They would be small enough to be flexible to respond to local needs.
- c) The police agencies would be accountable to the community, in that each would be governed by a civilian Board of Police Commissioners, consisting of members of the community, pursuant to section 55(1) of the *Police Act*.⁵⁰

⁴⁹ Transcript of Public Hearing, Volume 40, June 23, 2022, page 96, lines 18 to 22.

⁵⁰ Barry McKnight, *The Structure of Policing in Nova Scotia in April 2020*, COMM0040450. Pages 82 to 84 set out the applicable portions of the *Police Act*.

- d) This model would allow the RCMP to focus on its federal policing responsibilities rather than contract policing.

Conclusion

In addition to the above, the TPS has reviewed the final submission to the Commission of the Nova Scotia Chiefs of Police Association and endorses that submission.

The TPS thanks the Commissioners and Commission staff for their hard work and dedication they have shown to date, and thanks the Commission for giving the TPS the opportunity to provide its input to the Commission. The TPS wishes the Commission well in completing its final report and looks forward to that report and recommendations to improve policing and public safety in Nova Scotia and across the country.

Yours very truly,

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