



**REPORT TO  
CALGARY POLICE COMMISSION**

***Complaints Oversight Committee***

***Calgary Police Service – Arkinstall Response***

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**REPORT TITLE:** Calgary Police Service – Arkinstall Response

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The Calgary Police Service (CPS) submits this document to the Calgary Police Commission detailing steps taken to improve the structure and processes of the CPS Professional Standards Section (PSS) in response to the report findings of the Law Enforcement Review Board (LERB) Arkinstall Inquiry.

### **Overview of CPS PSS Improvements**

The Calgary Police Service’s Professional Standards Section (PSS) has initiated numerous improvements to structure and process in response to the report findings of the Law Enforcement Review Board’s Arkinstall Inquiry (October 2018) and the CPS PSS Internal Audit (January 2019).

The Service has committed a curriculum designer to the development of comprehensive onboarding training for all Professional Standards Section (PSS) investigators and personnel that equips members with the knowledge and skills to conduct thorough and

impartial investigations under the Police Act and Police Service Regulation (Arkininstall Recommendation 1).

CPS Senior Executive have approved process and staffing revisions that will deliver sustainable improvements to PSS investigations:

- Approved process revisions engage investigators earlier, enhance file ownership, and ensure quality assurance and documented decision-making is integrated throughout file progression.
- Approved staffing changes will increase administrative oversight, increase investigative oversight, enhance backgrounding on internal complaints, and provide stability and expertise through civilianisation of certain roles. The approved process and staffing changes directly support the adoption and implementation of Arkininstall recommendations 2,3,4, 5, and 6.

Changes to CPS Policy and standard operating procedures (SOPs) have been made to support process changes, and to comply with recommendations 6, 7, 8, and 9 of the Arkininstall Inquiry.

Appendix A details each recommendation of the Arkininstall Inquiry, and Calgary Police Service's response.

### **PSS Business Revitalisation – Background and Approach**

CPS Professional Standards Section policy and procedure had remained relatively static for over a decade. In Q2 2018, PSS initiated a body of work designed to revitalize their business processes – a 4-year business revitalization work plan was developed, and an internal CPS audit was requested. CPS received the Arkininstall Inquiry in Q3 of 2018 – the report and associated recommendations were reviewed in detail, and significant overlaps to the PSS business revitalization workplan were identified. The results of the CPS internal audit, received Q1 2019, further corroborated the objectives of the planned PSS business revitalization. CPS Executive supported the opportunity to deliver sustainable systemic changes to PSS business process that would address the recommendations of the Arkininstall Inquiry and CPS internal audits by allocating resources to create a PSS Business Revitalization Project Team.

Since June 2019, Chief Neufeld has taken a keen interest in the operations of PSS; Chief Neufeld has a strong background in complaints and discipline and was previously assigned to ASIRT. Effective October 2019, PSS is reporting directly to Chief Neufeld, rather than through a Deputy Chief. The PSS Inspector and Superintendent provide the Chief with weekly investigative review updates, and the Chief is actively engaged in decision making as required.

A timeline of the PSS Business Revitalization work is attached as Appendix B.

## Training Development

In 2018, as part of the business revitalization work plan, PSS management identified the need to provide standardised training to PSS detectives. A training seminar was developed and delivered to PSS detectives in June 2018. Detectives received training content from numerous stakeholders, including: PSS Legal Counsel, PSS Disposition Writer, Investigative Staff Sergeants, PSS Intake File Reviewer, Domestic Conflict Unit, FOIPP, Anti-Corruption Unit, IT Security, Human Resources, Calgary Police Association, Calgary Police Commission, and Psychological Services. In November 2018, four newly assigned PSS detectives received the training seminar over three days – these training sessions were audited by the Public Complaints Director (Calgary Police Commission).

The Arkinstall Inquiry and CPS internal audit recommended that CPS develop fulsome training for all professional standards investigators and personnel to ensure high-quality, thorough investigation of complaints (Recommendation 1). The Calgary Policy Service has committed a curriculum designer to the development of comprehensive onboarding training for all Professional Standards Section (PSS) investigators and personnel that equips members with the knowledge and skills to conduct thorough and impartial investigations of alleged misconduct by officers, supporting PSS's mission to ensure accountability in our police service by upholding professional and ethical conduct, exceeding community and member expectations and fostering trust. This training will also provide the structure and tools to create ongoing support and reinforcement opportunities.

## Training Proposal

- **Intake On-the-Job Training:** For the past five years all PSS investigators have completed on-the-job training in intake processes during their first three months with the Professional Standards Section; this on-the-job training will continue to be delivered. The PSS Investigator will be coached on the intake process, along with how to use the IAPRO software, following actual external complaint files. On-the-job training is an ideal format, as the PSS Investigator will get a high degree of interaction with an expert and will be provided with immediate feedback.
- **PSS Foundations E-learning:** CPS will introduce a new 10-hour PSS Foundations E-learning module. PSS members will complete the e-learning during their Intake On-the-Job Training, according to a defined schedule. The schedule will be aligned with the content addressed in the Intake On-the-Job Training. The e-learning will be supported by mentorship guidance, support, and feedback from the Quality Assurance Manager (new position) within the Section

and will ensure there is an aligned approach to ethics and accountability when assessing and investigating complaints.

- **Resources:** Performance support tools, job aids, or procedure manuals will be developed to support revisions to business processes. These resources will be helpful for conveying explicit knowledge and providing just-in-time learning, and will aid the PSS Investigator in the specific procedures that they must follow in their role.
- **Development Practices:** The creation of a Quality Assurance Manager position will play a critical role in developing a culture where development practices are supported and encouraged, and will ensure that mentorship guidance, support, and feedback will be available to investigators. The Quality Assurance Manager will be responsible for sharing, implementing, and continuous monitoring of external recommendations, such as from the Law Enforcement Review Board (LERB) or inquiry outcomes, ensuring a high standard of practice within the Section.

**Expected completion date:** Q2 2020

CPS have championed the need for a provincial training standard for PSS investigators through communication with Bill Sweeney, Assistant Deputy Minister for Alberta Justice and Solicitor General and the Alberta Association of Chiefs of Police (AACP). A working group was established in September 2019 with the objective of establishing provincial training standards for PSS investigators; CPS will be represented on the working group by a PSS Staff Sergeant.

In January 2019, 24 PSS employees received training, and subsequent certification, in risk management and structured professional judgement. This training has directly supported the adoption of risk-based triage and a structured professional judgement approach to ensure all complaints are investigated proportionately, effectively and efficiently. The Quality Assurance Manager will adopt responsibility for mentor and coaching future PSS employees in risk-based triage and a structured professional judgement.

### **Process and Staffing Revisions**

PSS piloted a revised process to addresses Arkinstall recommendations 2,3,4, 5, and 6 from April to September 2019. In August 2019, CPS Executive approved process revisions; as of October 2019, all PSS files will follow the revised process. Key process changes include:

- Risk-based triage on all files at intake using a structured professional judgement approach to identify and assess professional standards section files as high, medium, or low risk based on established risk factors. This triage enables PSS

to resource all files according to risk and complexity to ensure appropriate staffing levels to enable both internal and external complaints to be investigated proportionately, effectively and efficiently.

- Enhanced backgrounding by the Intake Team on files that could result in a Service Investigation – this will provide CPS Executive with a more robust understanding of each file, and will enable Executive members to make informed decisions.
- Review of all files closed through informal resolution by the Intake Team (~950 per year) by the Quality Assurance Team.
- Quality Assurance processes are embedded throughout file progression – to engage management team, PSS legal, and investigators in file review:
  - Investigative quality assurance will be reviewed at regular intervals, including through the File Review Meeting (FIRM) both after initial backgrounding (FIRM Stage One), and following assignment to an investigator (FIRM Stage Two). Investigators will present to the File Review Meeting at scheduled intervals for all criminal investigations, and as a midpoint review on all high-risk PSR investigations (FIRM Stage Three);
  - Early engagement of the PSS Hearing Officer will ensure that allegations are appropriate, and that required evidence is explored in full;
  - All PSR investigations will be subject to an administrative quality assurance review of file documentation (completed by the QA Team) and an investigative quality assurance review (completed by the Team Staff Sergeant) prior to going to the File Advisory Committee (FAC) for a final review;
  - The File Advisory Committee will ensure that the file is complete and thorough and will make an informed recommendation to the Chief on allegation disposition.
  - Decisions and tasks will be documented at all stages and archived on the PSS file management system (IAPro), documentation will include a File Review Matrix. The Chief will be provided with a file review package that includes the File Review Matrix, risk triage document, and key decision points from FIRM to inform decision making.

These process revisions engage investigators earlier, enhance file ownership, and ensure quality assurance and documented decision making is integrated throughout file progression. The File Review Meeting allows for timely check-in points for investigators, PSS management team, and the Chief on file progression. The project team have

clarified and defined roles and responsibilities as they pertain to key tasks, decisions, and approvals in file progression; there are now clear role-based expectations and increased accountability for all PSS members, as well as CPS executive members.

The PSS process changes have been accompanied by staffing revisions that increase administrative oversight, increase investigative oversight, enhance backgrounding on internal complaints, and provide stability and expertise through civilianisation of certain roles. PSS have CPS Executive approval to:

- Create a PSS Quality Assurance Risk Manager to lead a Quality Assurance Team comprising 4 Information Analysts. Benefits of this change include:
  - Increased administrative oversight;
  - Reduced single-points of failure and reduced backlog in process/workflow;
  - A more integrated approach to quality assurance including reviewing the ~950 files annually that are resolved by the Intake Team without further investigation;
  - Capacity and expertise to lead the new risk assessment triage process (Arkininstall Recommendation 4).
- Civilianize an investigative Staff Sergeant position and create a Civilian Investigative Manager to work alongside the Investigative Staff Sergeant. Benefits of this change include:
  - Increased investigative oversight;
  - Continuity of operations (stability, less staff turnover);
  - Diversity of experience;
- Create two Civilian Investigator positions, through the civilianisation of two Detective positions. Benefits of this change include:
  - Enhanced stability;
  - Addresses challenges of recruiting and retaining experienced investigators;
  - Provides opportunity to attract individuals with significant investigative knowledge, skills and abilities.

To increase capacity to complete backgrounding on internal complaints (Arkininstall Recommendation 2), PSS have requested allocation of a civilian FTE growth position to the creation of a Complaint Intake Administrator to report to the Intake Supervisor. Changes to the backgrounding process for internal investigations is going to result in ~100 additional files per year (a 15% increase in the Intake Team's workload), this equates to the workload of an FTE position. This request was approved by CPS Executive for 2020. The PSS Project Team are working alongside a Human Resources Manager and

Consultant to facilitate staffing revisions, including labour relations. A six-month Human Resources Plan has been drafted, detailing the necessary steps to support all position changes.

**Expected completion date:** Q2 2020.

In October 2019, CPS Executive made a commitment to stabilise PSS through establishing a 2-year expectation for investigators, and extending the appointment of current PSS managers to support fulsome implementation of PSS process and staffing revisions.

### **Enhanced Audit and Oversight**

PSS have worked with the vendor of their file management system to deliver enhanced audit and oversight functions to track the status of investigations. Changes will be implemented to enhance real-time reporting and assist supervisors in timely analysis of investigations.

**Expected completion date:** Testing Q2 and Q3 2019, implementation Q4 2019.

### **Policy and Standard Operating Procedures**

Changes to CPS Policy and standard operating procedures (SOPs) have been made to support process changes, and to comply with recommendations 6, 7, 8, and 9 of the Arkininstall Inquiry.

- CPS have ceased the use of 'administrative reviews' for issues relating to operational Use of Force with a potential discipline and/or misconduct component (Arkininstall Recommendation 6). Following a review of CPS Policy, references to the practice of PSS conducting 'administrative reviews' in relation to unintentional discharges of firearms, conducted energy weapons, and less lethal weapons systems have been removed and replaced with the direction for PSS to initiate an investigation into the circumstances of the discharge. **Completed Q3 2019.**
- To ensure members notify the Service of any adverse judicial findings (Arkininstall Recommendation 7), the 'CPS Member Investigations' policy will be updated to include the direction "*Officers are also required to disclose any adverse judicial and Crown comments that have been made about them during any legal proceeding. "Adverse" comments will include comments which are likely to bring discredit upon the officer, the CPS, or which allege the officer has violated s. 5 of the PSR or the Criminal Code.*"  
**Expected completion date:** Revised policy is drafted and pending approval by CPS Review of Policy and Procedures Committee, it will be published by end Q2 2020.
- Chief Barlow, CPS, sent letters on April 4<sup>th</sup> 2019 to Federal, Provincial and Municipal Chief Crown Counsel requesting Crown Counsel forward court decisions "*where it held that Calgary Police Service officers conducted*

*themselves in an inappropriate manner”* to the PSS Inspector. CPS have received acknowledgement of, and agreement with, this request from Calgary Crown Prosecutor and the Federal Crown in Alberta, and both have SOPs to support this process.

**Completed Q2 2019.**

- PSS has had a Judicial and Crown Criticism Standard Operating Procedure since 2014. The SOP provides a process to receive, examine and, if necessary, deal with criticism and comments from the Courts and Crown regarding CPS officers and policies. It requires PSS to conduct a background investigation in collaboration with PSS Legal Counsel. PSS Legal Counsel is responsible for drafting a memo outlining their recommendations for attention of the PSS Superintendent. This process was modified in October 2019, with the initial investigation being presented to the PSS Management Team at the File Review Meeting, and results being forwarded to the Chief for a decision on whether to order a service investigation (Arkininstall Recommendation 8). **Completed Q3 2019.**
  
- CPS has reviewed policy and procedures to ensure gang membership is not considered as a ground for deciding that alleged misconduct is or is not of a serious nature (Arkininstall Recommendation 9). A review of historical PSS documents found one titled “PSS file decision flow chart.” One of the considerations for whether a file was to be considered serious in nature stated the following, *“A risk of treating it as serious will contribute to developing a culture of fear that will encourage officers to avoid ‘high-risk-of-complaint-work’ such as policing gangs or organized crime.”* This was the only decision-making guideline document that PSS located that made any reference to gang membership as a consideration for how to proceed with an investigation. This document was amended in 2017 and any reference to gang membership was removed. The new PSS File Management Triage tool makes no reference to gang membership as a consideration in the intake and screening of new complaints.

**Completed Q2 2019.**

The PSS Management Team completed a review of investigative SOPs and will be engaging intake and investigative teams for their input. Team reviews of SOPs will be used as a training opportunity and will support the development of training resources and reference materials.

## **Conclusion**

CPS Executive's commitment to supporting the implementation of the business revitalization work plan, and the recommendations of both the CPS internal audit and Arkininstall Inquiry has resulted in a more rigorous, quality assurance focused process for all investigations and the creation of a quality assurance team and civilian investigative and supervisory roles that will ensure that process improvements are sustained. CPS has requested that the Operations Audit Section re-audit PSS in two to three years' time to confirm implementation and status of process improvements.

**Appendix A - Detailed response to CPS related Arkininstall Inquiry recommendations**

<b>Arkininstall Recommendation</b>	<b>CPS Response</b>
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<p><b>Recommendation 1 - CPS should ensure fulsome training for all professional standards investigators and personnel in order to ensure high-quality, thorough investigation of complaints.</b></p>	<p>CPS developed and delivered a training seminar to PSS Detectives in June 2018 (three half-day sessions), and November 2018 (three days) comprising content from numerous stakeholders. The Public Complaints Director (Calgary Police Commission) audited the November training seminar.</p> <p>In January 2019, 24 PSS employees received training, and subsequent certification, in the area of risk management and structured professional judgement. This training has directly supported the adoption of risk-based triage and a structured professional judgement approach to ensure all complaints are investigated proportionately, effectively and efficiently.</p> <p>The Service has committed a curriculum designer to the development of comprehensive onboarding training for all Professional Standards Section (PSS) investigators and personnel that equips members with the knowledge and skills to conduct thorough and impartial investigations of alleged misconduct by officers, supporting PSS's mission to ensure accountability in our police service by upholding professional and ethical conduct, exceeding community and member expectations and fostering trust. This training will also provide the structure and tools to create ongoing support and reinforcement opportunities.</p> <p><b>Expected completion date: Q2 2020</b></p> <p>CPS have championed the need for a provincial training standard for PSS investigators through communication with Bill Sweeney, Assistant Deputy Minister for Alberta Justice and Solicitor General and the Alberta Association of Chiefs of Police (AACP). A working group was established in September 2019 with the objective of establishing provincial training standards for PSS investigators; CPS will be</p>
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	<p>represented on the working group by a PSS Staff Sergeant.</p>
<p><b>Recommendation 2 - CPS should develop, or improve, its policies for deciding when it is appropriate to initiate a service investigation, and to ensure that these decisions are properly documented, are made by appropriate personnel, and are subject to robust internal checks and balances to guard against poor decision-making.</b></p>	<p>The Intake Team now complete enhanced backgrounding on files that could result in a Service Investigation – this provides CPS Executive with a more robust understanding of each file, and enables CPS Executive to make informed decisions.</p> <p><b>Completed Q2 2019.</b></p> <p>CPS Executive have approved a 2020 growth position to increase capacity to complete backgrounding on internal complaints.</p>
<p><b>Recommendation 3 - CPS should ensure that the full nature and scope of a complaint is understood, clearly defined and investigated without missing the essence of a complainant’s allegations through early and meaningful consultation with the complainant.</b></p>	<p>The PSS investigator workflow requires that both the Intake Team and Investigative Team verify the nature of the allegations with the complainant. A detailed record is retained which includes a tracking of decision points as well as recordings of all incoming and outgoing phone calls.</p> <p><b>Completed Q2 2019.</b></p>

<p><b>Recommendation 4 - CPS should review its policies and practices to ensure that all matters that qualify as complaints under the Police Act are treated as such, with formal complaint files being opened by PSS for every complaint, before any investigative steps or attempts at informal resolution are made.</b></p>	<p>All issues brought forward to Professional standards result in a record within the file management system before any investigative steps or attempts at informal resolution are made. All records are subject to riskbased triage at intake – this triage enables PSS to resource all files according to risk and complexity to ensure appropriate staffing levels to enable both internal and external complaints to be investigated proportionately, effectively and efficiently.</p> <p><b>Completed Q3 2019.</b></p> <p>The Quality Assurance Team will review the ~950 files annually that are resolved by the Intake Team without further investigation.</p> <p><b>Expected completion date: Q2 2020</b></p>
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<p><b>Recommendation 5 - CPS should undertake a thorough, expert review of its processes and practices for documenting all stages of complaints and for managing the resulting records (including clearly and thoroughly documenting all decisions along the way). PSS's commanding officer should be responsible for ensuring that complete records are kept for all complaints.</b></p>	<p>Process revisions engage investigators earlier, enhance file ownership, and ensure quality assurance and documented decision-making is integrated throughout file progression.</p> <p>The File Review Meeting (FIRM) allows for timely check-in points for investigators, PSS management team, and the Chief on file progression.</p> <p>Decisions and tasks will be documented at all stages and archived on the PSS file management system (IAPro), documentation will include a File Review Matrix. The Chief will be provided with a file review package that includes the File Review Matrix, risk triage document, and key decision points from FIRM to inform decision making.</p> <p><b>Completed Q3 2019.</b></p>
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<p><b>Recommendation 6 - CPS should cease its practice of conducting so-called “administrative reviews” of complaints and instead ensure that PSS conducts efficient and effective investigations of each complaint.</b></p>	<p>CPS have ceased the use of ‘administrative reviews’ for issues relating to operational Use of Force with a potential discipline and/or misconduct component. Following a review of CPS Policy, references to the practice of PSS conducting ‘administrative reviews’ in relation to unintentional discharges of firearms, conducted energy weapons, and less lethal weapons systems have been removed and replaced with the direction for PSS to initiate an investigation into the circumstances of the discharge.</p> <p><b>Completed Q3 2019.</b></p>
<p><b>Recommendation 7 - CPS policy should require any officer who becomes aware of adverse judicial findings about, or criticism of, the credibility of any officer’s sworn evidence, or about possible disciplinary misconduct or criminal actions by an officer, to report the matter immediately to PSS’s commanding officer. The</b></p>	<p>The ‘CPS Member Investigations’ policy will be updated to include the direction <i>“Officers are also required to disclose any adverse judicial and Crown comments that have been made about them during any legal proceeding. “Adverse” comments will include comments which are likely to bring discredit upon the officer, the CPS, or which allege the officer has violated s. 5 of the PSR or the Criminal Code.”</i></p> <p><b>Expected completion date:</b> Revised policy is drafted and pending approval by CPS Review of Policy and Procedures Committee, it will be published by end Q2 2020.</p>
<p><b>commanding officer should be required to consider initiating a complaint. If PSS’s commanding officer decides not to initiate a complaint, she or he must be required to record written reasons for that decision in the file, with a copy of the court decision and PSS reasons being given to the chief as soon as the decision is made.</b></p>	<p>Chief Barlow, CPS, sent letters on April 4<sup>th</sup> 2019 to Federal, Provincial and Municipal Chief Crown Counsel requesting Crown Counsel forward court decisions <i>“where it held that Calgary Police Service officers conducted themselves in an inappropriate manner”</i> to the PSS Inspector. CPS have received acknowledgement of, and agreement with, this request from Calgary Crown Prosecutor and the Federal Crown in Alberta, and both have SOPs to support this process.</p> <p><b>Completed Q2 2019.</b></p>

<p><b>Recommendation 8 - CPS policy on <u>responding to</u> adverse judicial findings or criticism about possible disciplinary misconduct or criminal actions by an officer should require that the chief be immediately advised of such findings or criticism, and that the chief be required to consider without delay whether a notification of serious or sensitive matters under section 46.1 of the <i>Police Act</i> should be made to the Minister. The chief should also be required to document the reasons for that decision.</b></p>	<p>PSS has had a Judicial and Crown Criticism Standard Operating Procedure since 2014. The SOP provides a process to receive, examine and, if necessary, deal with criticism and comments from the Courts and Crown regarding CPS officers and policies. It requires PSS to conduct a background investigation in collaboration with PSS Legal Counsel. PSS Legal Counsel is responsible for drafting a memo outlining their recommendations for attention of the PSS Superintendent. This process was modified in October 2019, with the initial investigation being presented to the PSS Management Team at the File Review Meeting, and results being forwarded to the Chief for a decision on whether to order a service investigation and consider whether it meets the threshold of a 46.1 notification.</p> <p>Adverse judicial and Crown comments that have been disclosed by an officer (see Recommendation 7) will be subject to the same process.</p> <p><b>Completed Q3 2019.</b></p>
<p><b>Recommendation 9 - CPS policy should be revised to eliminate gang membership as a ground for deciding that alleged misconduct is or is not of a serious nature.</b></p>	<p>A review of historical PSS documents found one titled "PSS file decision flow chart." One of the considerations for whether a file was to be considered serious in nature stated the following, "A risk of treating it as serious will contribute to developing a culture of fear that will encourage officers to high risk</p>

	<p>of complaint work such as policing gangs or organized crime.” This was the only decision-making guideline document that PSS located that made any reference to gang membership as a consideration for how to proceed with an investigation. This document was amended in 2017 and any reference to gang membership was removed.</p> <p>The new PSS File Management Triage tool makes no reference to gang membership as a consideration in the intake and screening of new complaints. <b>Completed Q2 2019.</b></p>
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## Appendix B – Timeline for CPS PSS Business Revitalization

Timeline – CPS PSS Business Revitalization		
2018	Q1	
	Q2	PSS Strategic Retreat
		4-year PSS Business Revitalization Workplan developed
		Internal CPS audit requested
		PSS investigators receive training through 3 half-day seminars
	Q3	CPS receive results of Arkinstall Inquiry
	Q4	Initial review of Arkinstall implications, establish scope of work
Newly appointed PSS detectives attend 2-day training seminar		
2019	Q1	PSS receive results of Internal CPS Audit
		S/Sgt and CPS Business Strategist assigned to create PSS Project Team
		PSS Strategic Retreat – employees and management
		CPS Executive approve revisions to PSS Mandate
		Risk Management and Structured Professional Risk Management Training delivered to 24 PSS members (all receive certification)
	Q2	Functional Review of PSS business processes
		Benchmarking with other law enforcement agencies
		Redesign of PSS business process to address recommendations
		Recommendation for development of a provincial training standard made to Bill Sweeney, Assistant Deputy Minister for Alberta Justice and Solicitor General
		Interim Report shared with the LERB through the CPC
		Curriculum Designer assigned to develop PSS Training
		Facilitated discussion with PSS investigators to identify training requirements
		Chief Neufeld begins his service with CPS
	Q3	Trial of revised PSS business process, refinements to process
		CPS Executive approved PSS process change and staffing restructure
		HR Consultant assigned to support staffing restructure
		AACP approval of working group and funds for development of provincial training standard
	Q4	Transition to revised PSS process for all files

		PSS start reporting directly to Chief, rather than through a Deputy Chief
		Weekly PSS investigative review briefings to the Chief commence
		Delivery of IAPro audit and oversight revisions
2020	Q1	Plan for staffing revisions (deliver HR Project Plan)
		Finalizing Training Curriculum and materials
	Q2	Training Delivery
		Implementation of Staffing revisions