

Mathew Milen Registered Clinical Social Worker

June 7, 2023

#### **Executive Summary**

Introduction: Throughout 2021 and into 2022 the College of Certified Psychophysiologists (CCP) and its principal, Robert L. Perkins, had been delivering educational services to members of Calgary Police Service (CPS). In the fall of 2022, it came to the attention of CPS that the CCP and Robert L. Perkins were not affiliated with, or operating under an accredited educational institution, nor were they regulated under the Health Professions Act (HPA) in Alberta. In response to this finding, a review was launched to determine whether, and if so, the extent to which the CCP teachings were integrated by those members (sworn and non-sworn) in attendance. The review also asked for commentary on the appropriateness of existing programs and services within CPS.

**Methodology:** To address this matter, a qualitative approach was taken and launched in January of 2023. This started with a review of existing programs and policies followed by a meeting with the Executive of the Bureau of People & Organizational Development to establish a sense of cultural competency. The process was followed by an examination of documents provided by members who attended training through the CCP. This was further supplemented by interviews with those members consenting to engage in the process. A total of individual and 3 group interviews were held. Interviews were designed to assist with understanding how CCP was experienced, any positive and or negative learnings, and how existing programs and services are delivered.

Findings: The review noted CPS' dedication to providing evidence-based and cutting-edge mental health services to its membership. The programs and services reviewed were aligned with best practice models and are supported by appropriately trained, credentialled, and regulated individuals. Despite difficulties encountered and the distress it may have caused, there was no evidence to suggest CCP educational interventions resulted in a permanent and/or adverse impact on existing programs within CPS. Further, the courses were not materially integrated in any meaningful way into CPS program delivery. Some members of the Health, Safety and Abilities Section were; however, left with a misunderstanding that the training provided informed part of the CPS Wellness & Resiliency approach.

Recommendations: Recommendations from this review include: 1) To mitigate risk, ensure future Mental Health Professionals providing care to CPS members are regulated under the HPA of Alberta; 2) Create appropriate policy to ensure privacy and confidentiality (i.e. private health care information cannot be accessed by those individuals and senior officers not directly engaged with members through the Wellness & Resiliency section or Health, Safety and Abilities Section); 3) CPS Chaplaincy Services policy and programming is developed in non-denominational, while accommodating a secular / non-religious format, aligned with existing Equity, Diversity and Inclusivity principles / policies; 4) To avoid future conflict of interest, or the optics therof, with training, appropriate and iterative oversight should be provided by a regulated Health Care Professional with appropriate cultural competency and safety skills, 5) Those members who experienced a psychological injury related to this training should be offered appropriate mental health supports, and; (6) To repair any sense of moral injury within the Bureau of People & Organizational Development resulting from the CCP and subsequent workplace investigation, measures should be taken to optimize supporting impacted sections, their staffing quotient, along with offering support within senior management.

## **Background**

Untreated, or inappropriately treated mental health conditions in law enforcement officers represent a salient risk to the officer and the public. There are unique stressors in policing and the need for appropriate support services is widely recognized. A key component of a comprehensive approach to the mental health management of members is education and training in relevant mental health issues.

In 2021, the Calgary Police Service (CPS) engaged the College of Certified Psychophysiologists (CCP) and its principal, Robert L. Perkins, to deliver various trainings to CPS members. Due to concerns with the accreditation of the CCP, the professional relationship with CCP and Robert L. Perkins was terminated. The need for an independent review of CCP trainings was identified to determine whether, and the extent to which the CCP's educational offerings had been integrated within CPS' Wellness & Resiliency Division, as well as the Chaplaincy programs and services.

#### Mandate

An independent review was requested as it relates to CPS' involvement with CCP and its principal Robert L. Perkins. The mandate consisted of:

- Review the content of training materials and education provided to CPS by the CCP;
- Assess the extent to which these delivered materials and learnings have been incorporated into CPS Wellness & Resiliency, as well as Chaplaincy programs and services, and;
- If necessary, provide an opinion and recommendations on the appropriateness of existing programs and services within CPS.

The project mandate also included a review of existing programs and services to gain a better understanding of CPS culture. Further, a review of CCP educational programs offered to CPS, including:

- Critical Incident Stress Debriefing (CISD) Training<sup>1,2</sup>;
- Police Mental Health Certificate<sup>3</sup>, and;

<sup>1</sup> Critical Incident Stress Debriefing (CISD) refers to standardized method for debriefing groups of first responders. Despite its intention, the CISD method has been demonstrated to, in some instances, increase symptoms associated with traumatic stress or psychological injury.

D. O. V. A. (2022, October 6). *Types of Debriefing Following Disasters*. PTSD: National Centre for PTSD. https://www.ptsd.va.gov/professional/treat/type/debrief\_after\_disasters.asp

<sup>&</sup>lt;sup>2</sup> This course was offered in a 2-day online format with members of various policing / law enforcement agencies from across North America.

Ph.D. in Clinical Police Psychophysiology<sup>4</sup>.

# Methodology

To achieve a robust understanding of the corporate culture, programs and priorities, I followed a qualitative approach from January to May 2023. This included a review of relevant internal documentation, including documentation shared by CPS members and the retaining party and relevant peer-reviewed as well as grey literature. Further, a review of CCP training materials was performed<sup>5</sup>, followed by a discussion with the Deputy Chief and Executive Officer of the Bureau of People & Organizational Development and the Executive Director of Legal & Regulatory Services Division. Finally, the relevant Law Enforcement Officer best practice guidelines of the American College of Occupational and Environmental Medicine (ACOEM) were reviewed, and a generic discussion of mental health care principles was conducted with one of the co-authors of the ACOEM guidelines.

In March 2023, interviews were conducted with sworn and non-sworn members of the various programs and services that had attended training with CCP or were impacted by the decision to appoint Robert L. Perkins. A total of individual and 3 group interviews were held with members from the Wellness & Resiliency Division, Early Intervention Program and the Health, Safety and Abilities Section, Human Resources Division.

The findings were documented and collated, consistent with the qualitative research protocol. As this was not a research study, no Research Ethics Board (REB) approval was required or recommended. However, all interviews were conducted with the informed consent of participants.

#### **Summary of Findings**

- 1. With the exception of the Health, Safety and Abilities Section, the training offered by the CCP was *not* found to have been integrated, in any material fashion, into the learnings or day-to-day practices of those members operating under the Wellness & Resiliency Division, Early Intervention Program, and/or Chaplaincy services.
- 2. Existing programs and services under the Wellness and Resiliency branch are aligned with evidence-based guidelines;

<sup>&</sup>lt;sup>3</sup> This program was an online and self-directed program with associated digital (i.e., YouTube)-based lectures that appeared to be borrowed from other educational institutions. The lecturers were unknown to members who participated and did not appear to be associated with the CCP.

<sup>&</sup>lt;sup>4</sup> This program is an online and self-directed program with no evidence of supervision.

<sup>&</sup>lt;sup>5</sup> Appendix A.

- 3. The lack of adherence to policy and the resulting engagement with the CCP and its principal Robert L. Perkins inadvertently resulted in mistrust of leadership among members of the Bureau of People & Organizational Development and the greater membership, and;
- 4. Although Chaplaincy Services is deeply valued amongst the membership, in the absence of appropriate policy and documentation outlining their mandate and scope of practice, aspects of the members continue to associate this service with negative connotations of religious and historical origins.

#### Conclusion

I am able to state the following with a reasonable degree of medical certainty and on a balance of probabilities:

- 1. Despite difficulties encountered and the distress it may have caused, I did not find evidence to suggest the educational interventions delivered by Robert L. Perkins and the CCP resulted in a permanent and/or adverse impact on existing programs within CPS.
- 2. The current programs and services offered to members within CPS, i.e. outside those offered by Mr. Perkins, are evidence-based and aligned with best practice guidelines<sup>6,7</sup>;
- 3. Based on the qualitative evidence obtained, there is sufficient evidence to confirm that an adverse outcome did occur in the form of a moral injury<sup>8</sup> to members of the Wellness & Resiliency Division. Specifically, the CCP training as well as the required associated investigations and new articles led to negative feelings including distrust and not feeling supported by their organization and its leadership.
  - a. Moral injury refers to the process by which individuals working with organizations vulnerable to trauma are harmed by the process of trying to prevent ethical dilemmas. This process typically results in feelings of shame, guilt and anger<sup>8</sup>.
  - b. As a result of the mentioned moral injury, Police Officers commonly report experiencing feelings of unappreciation, frustration and disappointment. This process can result in Police Officers becoming skeptical of their organization and perception that their organization does not support them<sup>8</sup>.
  - c. Left unchecked, moral injury in the form of organizational betrayal may result in the willingness to put one's efforts into their organization and work quickly turns to self-preservation of oneself and their unit/section within the organization<sup>8</sup>.

<sup>6</sup>. Reed Group: Law Enforcement Officer Guidelines: URL: <u>LEO Guidance - by ACOEM</u> (Accessed: June 5, 2023).

<sup>&</sup>lt;sup>7</sup> D. O. V. A. (n.d.). VA/DoD Clinical Practice Guideline for The Management Of Posttraumatic Stress Disorder And Acute Stress Disorder. VA / DoD Clinical Practice Guidelines. Retrieved May 3, 2023, from https://www.healthquality.va.gov/guidelines/MH/ptsd/VADoDPTSDCPGFinal012418.pdf

<sup>&</sup>lt;sup>8</sup> Lentz LM, Smith-MacDonald L, Malloy D, Carleton RN and Brémault-Phillips S (2021) Compromised Conscience: A Scoping Review of Moral Injury Among Firefighters, Paramedics, and Police Officers. Front. Psychol. 12:639781. doi: 10.3389/fpsyg.2021.639781

- d. Furthermore, moral injury has been associated with the potential for psychological traumatization (i.e., PTSD) and although it may not be triggered by fear-based mechanisms, it can involve cognitive, emotional, spiritual and existential struggles<sup>9</sup>.
- e. I am unable to rule out that such injury may not have compounded any pre-existing psychological injuries / psychiatric disorders / mental distress in members exposed to CCP training(s).
- 4. It is understandable and commendable that the Calgary Police Service has made every reasonable effort to offer evidence-based, cutting-edge and dynamic services and educational training. However, despite efforts to protect the health and wellness of members, errors and unintended consequences may have followed. Comments around adherence to internal approval processes fall outside the scope of this report. The absence of oversight by a credentialed Mental Health Professional operating under the HPA in Alberta, may have contributed to the situation.

#### Recommendations

- 1. A deliberate, comprehensive, and evidence-informed approach to mental health should be adopted in the CPS, under the direction of a suitably qualified Alberta-regulated Mental Health Professional:
- 2. It is recommended that a formal process is established to ensure due diligence in future engagement of educational programs and trainers;
- 3. Notwithstanding the high level of knowledge and exemplary work ethic observed in members of the Abilities Management team, and as is the often case in situations like these, there is always room for improvement and opportunities to augment quality of existing training. Training in this field is best viewed as an iterative endeavour. Such an approach would ensure an appropriately enhanced understanding of existing high-quality programs and interventions currently offered by members of the Wellness & Resiliency Division. For that reason, further and ongoing training in mental health and addiction in a trauma-informed context should be offered to CPS members and Departments;
- 4. Members who have sustained a moral injury, or where material subjective distress ensued, should be offered remedial counselling / supports;
- 5. Members and management at all levels should be reminded of the option to access and engage with the various branches of the Wellness & Resiliency Division, and steps should be taken to become more familiar with their services, culture, vernacular, and training offered;

<sup>&</sup>lt;sup>9</sup> Griffin, B. J., Purcell, N., Burkman, K., Litz, B. T., Bryan, C. J., Schmitz, M., et al. (2019). Moral injury: an integrative review. J. Trauma. Stress 32, 350–362. doi: 10.1002/jts.22362

- 6. To assist in acknowledging the injuries caused and/or perpetuated within Wellness & Resiliency Division, further consultation should be considered with regard to:
  - a. Staffing levels and workloads to ensure potential burnout is screened for, prevented as far as possible, and addressed appropriately when detected;
  - b. Given the specialized nature of this work, consideration should be given to tenure and succession planning;
  - c. Providing adequate working space for both group and individual and confidential discussions:
  - d. Developing policy to ensure private and confidential health care information is not accessed or released to individuals or senior management without due course;
  - e. Ensuring clinical leadership and consultation is accessible to all members of Wellness & Resiliency Division to reduce any problem potential associated with any existing or future internal programming offered;
  - f. Ensuring practicing members of the Psychological Services Team are registered Mental Health Professionals operating under the HPA of Alberta.
- 7. To mitigate risk of recidivism and to avoid future conflict of interest (or the optics thereof), occupational psychological services should be separated from clinical services to ensure trust and confidentiality are established and shared among membership.
- 8. Appropriate and iterative program oversight by an experienced service provider, regulated under the HPA of Alberta, is recommended to allow for mitigation of similar future risk.
- 9. Throughout the review process, some members S. 17(1)
  that although the Chaplaincy Services have been a positive resource within the service, the program and its respective space remain associated with organized religion, in a fashion that may not be welcomed by all. This is reportedly further perpetuated by various affiliations CPS leadership had allegedly historically held. To ensure Chaplaincy Services remains free of unwanted or inappropriate religious content and context, the following recommendations are offered for consideration:
  - a. Create Chaplaincy Services documentation which defines the term Chaplaincy and their scope of practice,
  - Given the historical associations to the church and ongoing misconceptions held by some of the membership regarding the nature of Chaplaincy services, the program should specifically speak to non-denominational practice and how it is aligned with Equity, Diversity and Inclusion practices and policies;

- c. Minimize and/or remove any outward-facing religious iconography within CPS spaces, including in the Constable Arthur Duncan Memorial Hall, and;
- d. Discontinue hosting religious ceremonies within CPS spaces.

#### **Final Comments**

What stood out through this independent review was the high level of work ethic, commitment, and dedication shown by members of CPS. Numerous strengths were observed in members. To mitigate risk, maintaining a psychologically healthy workforce is of paramount importance in policing. Untreated or inappropriately treated mental health conditions in law enforcement officers pose an unacceptable and disproportionately elevated risk to members and to the public. To safeguard the mental health of members, ongoing education and training in relevant mental health issues are indispensable components.

It is my opinion that, based on this review, CPS has already demonstrated a high degree of responsiveness to the need for policy adjustments to remedy issues arising from, and to mitigate the risk of recurrence of the experience with CCP.

To best support the evidence-based programming that has been initiated by the members and executives of the Wellness & Resiliency Division to date, a range of recommendations were offered.

Respectfully submitted;

Mathew Milen Clinical Social Worker

## Appendix A: Disclaimer

I, Mr. Mathew Milen, am responsible for the documented comments based on reviewing the pertinent information and conducting the mentioned interviews.

I was not in a position to objectively verify the historical accuracy of all of the information provided in advance of conducting the interviews, and if significantly inaccurate or incomplete, it may understandably impact the accuracy of the opinions provided, and my stated opinion may be subject to modification or change.

I reserve the right to alter my opinion should further information come to light, which would warrant reconsideration of the opinion.

The reader is advised to contact me if any clarification is required regarding the content of this report.

Based on the interviews, documents reviewed, as well as my knowledge and experience, I am in a position to offer the stated opinions with a reasonable degree of certainty.

The opinions expressed are not necessarily those of any of the writer's associates, professional partners, collaborators or employer.

# Appendix B: Mandate and Scope of Review

The following scope of work was outlined in the November 23, 2022, Agreement Letter:

The Consultant's Scope of Work is to independently:

- (B) Review the content of education and training material provided by CCP to CPS members, to the extent available. Review may consist of training materials and documentation, and interviews with CPS members who took the training.
- (C) Assess whether, and if so how and to what extent, CCP education and training material has influenced or been incorporated into CPS Wellness & Resiliency or Chaplaincy programs or services.
- (D) Provide an opinion, and recommendations if necessary, on the appropriateness of any CPS Wellness & Resiliency or Chaplaincy programs or services that have incorporated from or been influenced by CCP education and training.

Included in this Scope of Work is confirmation by the Consultant of whether any inappropriate religious content or influence was part of CCP education or training as incorporated into CPS programs or services, or otherwise.

The Consultant's Scope of Work:

- Is not a Workplace Investigation and will not make findings (of fault or otherwise) or recommendations relating to specific individuals. The Scope of Work is focused on clinical content, programs and services. Accordingly, there is no duty of procedural fairness or confidentiality owed to individual CPS employees.
- Is not a full review or audit of CPS' Wellness & Resiliency or Chaplaincy programs or services; however, the Consultant may make recommendations for further inquiry or work related to those programs that may be required in future based on clinical best practices as a guide.

#### Appendix C: Documents Reviewed

- 1. Agreement Letter City of Calgary and Mathew Milen;
- 2. Overview of CPS Wellness & Employee Support Services;
- 3. Bureau of People and Organizational Development Priorities;
- 4. Training and Post-Secondary Education Calgary Police Services;
- 5. Report to Calgary Police Commission Tuition Assistance Program Overview;
- 6. Resilient Together: The CPS Workplace Psychological Wellbeing Strategy, August 20, 2021;
- 7. 2022 2023 Calgary Police Services People Plan;
- 8. Bureau of People & Organisational Development Our Work Plan: 2022 Timeline, Planned Activities, Desired Outcomes and Major Progress Milestones / Successes
- 9. CPS Organizational Structure, December 6, 2022;
- 10. Briefing Note: Collateral Recommendation Arising from Investigation into Dealing with the College of Certified Psychophysiologists;
- 11. Briefing Note: Collateral Recommendations Arising from Investigation into CPS Dealings with the College of Certified Psychophysiologists;
- 12.2023 College of Certified Psychophysiologists (Expert Review: Training Material) dated January 18, 2023;
- 13.2023 College of Certified Psychophysiologists (Expert Review: Training Material) dated January 26, 2023.



The Impact of Training Provided by the College of Certified Psychophysiologists to Calgary Police Service Members	
S. 17(1)	

The Impact of Training Provided by the College of Certified Psychophysiologists to Calgary Police Service Members				
S. 17(1)				

	ing Provided by the Colle	ge of Certified Psycho	physiologists to Calga	ary Police Service Me	embers
S. 17(1)					

		gr rovided by the conege (	ologists to Calgary Police Ser	VICE IVICITIDEIS
S.	17(1)			



- 33. Code 900: What now?
- 34. Civilian Reintegration Brochure;
- 35. The Tyee: "It's a Cover Up, and it's Very Self Serving";
- 36. Briefing Note: Peer Support Nurse Therapist;
- 37. Briefing Note: Peer Support;
- 38. Briefing Note: Reach;
- 39. Briefing Note: Reintegration;
- 40. Briefing Note: Wellness Coordinator;
- 41. Video: Wellness Death by a 1000 Cuts, Calgary Police Service;

Policing Standards, to Better Respond to Sexual and Gender Harassment in the

42. Reforming The Alberta Police Act\*, Police Service Regulation, and Provincial

	Workplace; (1)		
S. 17	7(1)		