

City of London - Internal Audit

Emergency Management Program Review

29 May 2024

Prepared By: MNP LLP

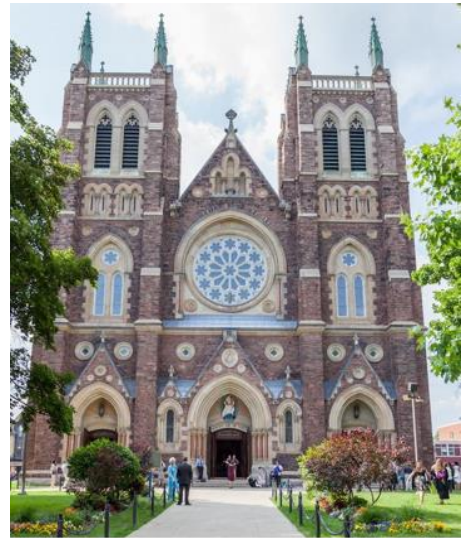


Table of Contents

1.0	BACKGROUND	1
2.0	OBJECTIVES	1
3.0	METHODOLOGY AND APPROACH	1
4.0	SUMMARY OF RESULTS	3
5.0	ACKNOWLEDGEMENT OF COOPERATION AND EFFORTS	5
6.0	LIMITATIONS AND RESTRICTIONS	5
7.0	DETAILED OBSERVATIONS, RECOMMENDATIONS AND CONSIDERATIONS	6
	APPENDIX A – LIST OF INTERVIEWEES	12
	APPENDIX B – REPORT DISTRIBUTION LIST	13

1.0 BACKGROUND

The City of London (“City”) is a municipality with a population of approximately 519,000 (as of 2023) and it provides various community support services to its residents. As a municipality, the City is continually attempting to improve its operating efficiency, effectiveness, and transparency for the benefit of its residents. With this focus on continuous improvement, and in accordance with the City’s current internal audit plan, a review of the City’s emergency management program was performed.

The scope of the review included all aspects of emergency management and business continuity but excluded IT disaster recovery and cyber incident response.

2.0 OBJECTIVES

The principal objectives of this review were to:

- Review and assess the functioning and maturity of all components of the City’s emergency management program.
- Identify and highlight existing strengths that should be sustained and that can serve as a foundation for further enhancements.
- Identify and detail opportunities for improvement, aiming to bolster the city’s overall resilience and the efficacy of the emergency management program.

3.0 METHODOLOGY AND APPROACH

The review methodology was anchored in globally recognized standards that define leading practices in emergency management and business continuity including:

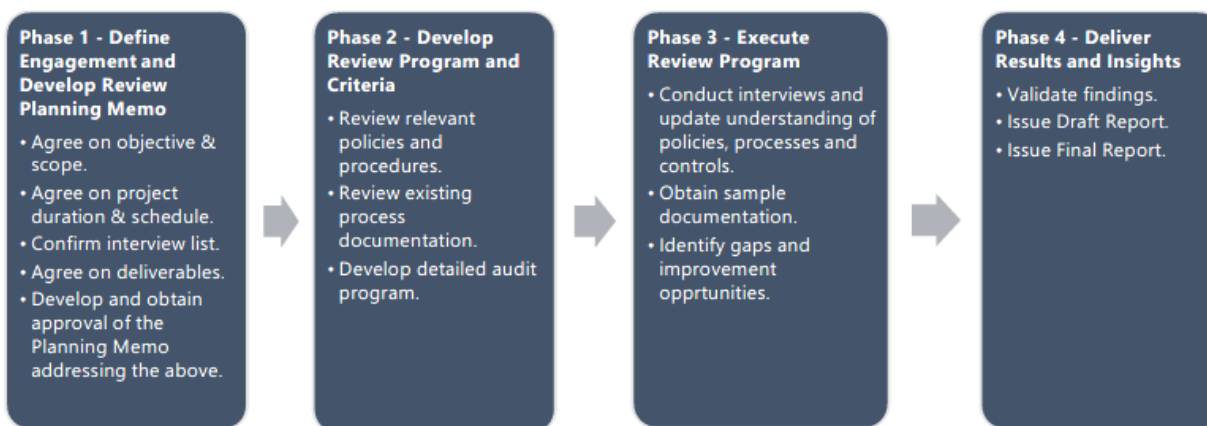
- CSA Z1600-17 – Emergency and Continuity Management Program
- ISO 22301 – Business Continuity Management Systems
- DRI International’s Professional Practices

The above standards and leading practices were further supplemented by MNP’s experience as a consultancy and knowledge gained through conducting a large number of similar reviews for municipalities across Canada.

The review methodology targeted, and this report is structured around, the four key components of comprehensive emergency management program.

- **Governance and Structure:** The leadership, authority, accountability, and organizational structure of the program, including the integration of the different program components and elements.
- **Risk Assessment and Analysis:** The risk-based aspect of the program, how risks are identified, assessed, and prioritized to inform the development of emergency management and business continuity strategies, plans and priorities.
- **Plans and Procedures:** This component includes the different documents that translate policy and strategic objectives into actionable plans and procedures. The review included evaluating the clarity, completeness, and efficacy of emergency response plans, procedures and supporting annexes.
- **Sustainment and Continuous Improvement:** The ongoing training programs, exercises, and maintenance activities that ensure the program adapts to new challenges, maintains its effectiveness and is continuously improving.

The approach and high-level work plan for the review included the following phases:



Maturity Rating Scale:

It was determined during the planning phase that, for this review and the specific objectives, results are optimally presented by maturity level. The maturity rating scale used is shown in the table below.

Rating	Description
Low Maturity	Plan or program element has not been developed, is outdated, OR is not aligned with leading practices. Immediate action is necessary, and a specific management action plan should be developed as a priority.

Medium Maturity	Plan or program element has been developed but should be improved/updated, does not align with leading practices, OR element is under development but not complete and/or implemented. Effort should be focused on fully developing or updating to address opportunities for improvement.
High Maturity	Plan or program element is fully developed, aligned with leading practices, and implemented. Effort should be focused on sustainment, continual improvement, updating and refinement as part of a regular review cycles.

4.0 SUMMARY OF RESULTS

The information below summarizes the overall results of the review and provides an overview of current strengths of the City's emergency management program as well as identified opportunities for improvement to program maturity. A full list of observations by emergency management program component, along with recommendations and considerations for management, can be found in Section 7.0 of this report.

Overview and Current Strengths

The City of London's emergency management program is mature, fully developed, implemented, and continually improving. The program goes beyond compliance with provincial standards and incorporates all components and elements of a high functioning and leading practice-based emergency management program. Overall, the emergency management program is rated as having High Maturity with only two areas rated as Medium Maturity and no areas rated as Low Maturity.

Notable current strengths are outlined below. These strengths are aspects of the program that should be sustained and will require continuous effort to maintain over time.

- Emergency Management Culture:** There is a strong "emergency management culture" evident throughout the city's operations, emphasizing practical readiness over theoretical planning. Leaders at all levels are engaged and there is evidence of a city-wide commitment to the emergency management function. This culture has been fostered and developed over the years and is a key differentiator for the City of London. It is a result of/outcome from a combination of the other strengths listed below.
- Relationships and Interoperability:** The program excels in fostering relationships and interoperability with a wide array of emergency management partners - including police, fire, emergency medical services, hospitals, critical infrastructure service providers, and post-secondary institutions.

- **Experienced Leadership:** The knowledge and experience of the emergency management program leaders is a key strength. The program is being driven by these dedicated leaders - Director of Emergency Management and Security Services, 2 x managers and a Deputy City Manager who is also experienced in emergency management – and they are respected both within the City and with emergency management partners.
- **Plan Documents and Communication Systems:** Well-maintained and current plan documents and robust communication systems are in place to help ensure an effective and coordinated response to all types of emergencies and business disruptions.
- **Training and Exercise Program:** A comprehensive training and exercise program keeps emergency response teams well-prepared, ensuring they are familiar with their roles and can respond efficiently during actual emergencies. The training and exercise program also is a key contributor to the overall emergency management culture.
- **Emergency Operations Centre (EOC):** The city's EOC facility is a cornerstone of the emergency management program both for the City and the emergency management partners. This has been a very worthwhile investment. Equipped with appropriate technology and resiliency (i.e. generators) the EOC serves as the command hub during emergencies, enhancing communication and operational decision-making, as well as a hub for emergency management training.

Summary of Recommendations

In summary, there are three (3) main recommendations resulting from this review – one general and overarching recommendation, and two (2) specific recommendations to enhance program maturity (the only items from the program review rate as Medium Maturity).

General Recommendation – Sustain and Maintain: As noted in the section above, the City of London's emergency management program is mature and high functioning; however, continuous effort and focus is required to maintain and continuously improve all components. The emergency management program is well-regarded by staff, citizens, and emergency management partners who expect it to continue playing a pivotal leadership role across all phases of emergency management.

To meet these expectations and maintain the current strengths it is recommended that continued effort and investment be sustained. While appropriate, the program is lean in staffing for the scope and breadth of emergency management and business continuity services and functions provided. In addition, in order to be prepared for the future, and taking into consideration evolving risks (i.e. climate change and human caused hazards) regular review and updates to strategies and plans is required to adapt to evolving emergency management and continuity of operations challenges and opportunities.

Recommendation - Streamline and Reconcile the Number of Business Continuity Plans: The City took the appropriate approach when developing business continuity plans in 2019 and followed leading practices when developing the initial baseline of department level business continuity plans.

While plan content and format are effective, and interviewees confirmed that they find the plans clear and helpful, there are a large number of plans to manage – some of which are for non-time critical areas. There is an opportunity to reduce the total number of plans to focus primarily on the critical and time sensitive functions.

It is recommended that during the planned 2024 business continuity review the City review and reconcile the total number of department plans and focus effort going forward on the critical and time sensitive departments and functions. Streamlining and reducing the number of plans will help create efficiencies, reduce the effort required for plan management and updates and allow time for training and exercising the department business continuity leads.

Recommendation - Enhance Recovery Phase Planning

An acknowledged opportunity for improvement with the current program is related to the recovery phase of the emergency management cycle. Although there is a Recovery Plan Annex in the overarching London Emergency Response Plan (LERP) it should be enhanced and include more detail to help the City prepare for this challenging phase of emergency management.

It is recommended that, utilizing the current Recovery Plan Annex as a starting point, a more detailed and potentially stand-alone recovery plan document be developed. This plan should include, but is not limited to: defined membership, by name and position, for each of the identified recovery committees; and, process documentation along with tools and templates to support recovery efforts. Once the recovery plan is developed training for individuals identified as committee leads should be conducted.

5.0 ACKNOWLEDGEMENT OF COOPERATION AND EFFORTS

Internal Audit would like to express our appreciation for the cooperation and efforts made by City personnel who lead and manage the emergency management program. Their contributions assisted in ensuring a successful review engagement.

6.0 LIMITATIONS AND RESTRICTIONS

This report is intended solely for the information and use of the City of London and should not be distributed to third parties without MNP's prior written consent. Any use that a third party makes of this report, and any reliance or decisions made based on it, are the responsibility of such third party. MNP accepts no liability or responsibility for any loss or damages suffered by any third party as a result of decisions made or actions taken based on this report.

7.0 DETAILED OBSERVATIONS, RECOMMENDATIONS AND CONSIDERATIONS

The table below provides detailed observations made during the review along with recommendations and considerations for implementation. Each observation is accompanied by a maturity rating. Recommendations are as follows:

- Continue current efforts to sustain, maintain and improve all aspects to the emergency management program.
- Streamline and reconcile the number of business continuity plans.
- Enhance recovery phase planning.

#	Observations	Maturity Rating	Recommendations and Considerations	Management Response
1	<p><u>Governance and Structure</u></p> <ul style="list-style-type: none"> • Aligned with Provincial requirements, the City has established and implemented a robust governance framework for emergency management - with strong participation from senior leadership and community emergency management partners. This collaborative approach enhances preparation as well as decision-making and operational coordination during emergencies. • The reporting structure for the emergency management function (a dedicated Director reporting to a Deputy City Manager) is well-defined, and there is sufficient staffing and resources to support an effective program. However, current staffing levels are lean when considering the scope of the program any 	High	<p><u>Recommendation:</u> Sustain and Maintain</p> <p>Consideration should be given to:</p> <ul style="list-style-type: none"> • Continued focus on succession planning for the emergency management and business continuity functions to ensure continuity of leadership and expertise within the program. This should include identifying potential future leaders and providing them with the necessary training and development opportunities. • Conduct regular reviews of resource allocation to ensure the 	<p>Action Plan: Management agrees with recommendation. Training and Development of Staff is ongoing and annual capacity assessments are conducted.</p> <p>Accountability: Emergency Management Team.</p> <p>Timeline: Ongoing</p>

#	Observations	Maturity Rating	Recommendations and Considerations	Management Response
	<p>reduction in staff or funding could significantly impact the program's efficacy.</p> <ul style="list-style-type: none"> The program is led by experienced and knowledgeable individuals, whose expertise is critical to its success. 		<p>program remains adequately staffed and funded.</p>	
2	<p><u>Risk Assessment and Business Impact Analysis</u></p> <p><u>Risk Assessment</u></p> <ul style="list-style-type: none"> The Hazard Identification and Risk Assessment (HIRA) process within the City is robust, effectively identifying potential hazards and assessing risks comprehensively. The HIRA is regularly updated to reflect new information and emerging threats, ensuring that the data remains current and relevant. The information derived from the HIRA is effectively summarized, providing clear and actionable insights that are integral to informing the City's emergency planning and exercise programs. This ensures that all emergency management activities are aligned with the identified risks, enhancing preparedness and response strategies. 	High	<p><u>Recommendation:</u> Sustain and Maintain</p> <p>Consideration and focus should be given to:</p> <ul style="list-style-type: none"> Continued to use HIRA information to guide planning and exercises, ensuring that the emergency management program remains aligned with identified risks and priorities. Ensuring communication of HIRA findings to all relevant emergency management partners to assist with a shared understanding of risks. 	<p>Action Plan: Management agrees with recommendation. HIRA is reviewed annually and informs training and exercises. HIRA is shared via the CEMPC.</p> <p>Accountability: Emergency Management Team.</p> <p>Timeline: Ongoing</p>

#	Observations	Maturity Rating	Recommendations and Considerations	Management Response
	<p><u>Business Impact Analysis</u></p> <ul style="list-style-type: none"> Business Impact Analyses (BIAs) have been conducted across various departments, identifying critical business functions and assessing the potential impact of disruptions. However, these BIAs require a review and update to ensure they reflect the current operational environment and any changes in priorities or processes. The ongoing review and update of BIAs have been recognized as necessary by the City’s emergency management leaders, with steps already being taken to refresh and refine these analyses. 	<p>Medium</p>	<p><u>Recommendation:</u> As part of business continuity plan streamline and reconciliation update BIA information.</p> <p>Consideration for Implementation:</p> <ul style="list-style-type: none"> A full BIA is not required, and a prudent approach is to review the existing time criticality of functions and services and generally group them into “detailed continuity planning required” or “detailed continuity planning not required”. 	<p>Action Plan: Management agrees with recommendation. Work is underway.</p> <p>Accountability: Emergency Management Team.</p> <p>Timeline: 2025 Q4</p>
<p>3</p>	<p><u>Overall Plans and Procedures</u></p> <ul style="list-style-type: none"> The City’s London Emergency Response Plan (LERP) is meticulously documented, kept current, and demonstrates a commitment to continuous improvement. This comprehensive approach ensures that the City is well-prepared to respond effectively to a variety of emergencies. The annexes to the LERP are extensive and cover a wide array of high-risk scenarios and specific incidents. Each annex is clearly owned by designated individuals or departments, ensuring 	<p>High</p>	<p><u>Recommendation:</u> Sustain and Maintain</p> <p>Consideration and focus should be given to:</p> <ul style="list-style-type: none"> Continued use of the HIRA information to inform prioritisation. Continued annual review of the LERP annexes to incorporate new risks, insights from recent 	<p>Action Plan: Management agrees with recommendation.</p> <p>Accountability: Emergency Management Team.</p> <p>Timeline: Ongoing</p>

#	Observations	Maturity Rating	Recommendations and Considerations	Management Response
	<p>accountability and clarity in emergency response roles.</p> <ul style="list-style-type: none"> Communications systems, protocols and procedures are well developed and practiced. 		<p>exercises, and lessons learned from actual incidents.</p>	
	<p><u>Business Continuity Plans</u></p> <ul style="list-style-type: none"> The business continuity plans developed by the City are thorough and adhere to best practices, ensuring that critical business functions can sustain operations during disruptions. However, there exists an opportunity to enhance efficiency by consolidating the numerous department-level plans. Streamlining these plans will not only reduce the administrative burden of managing and updating them but will also enable a more focused approach to business continuity planning and exercises, prioritizing the most critical services. 	Medium	<p><u>Recommendation:</u> As part of the ongoing business continuity review, reconcile and reduce the total number of plans and focus efforts on the most critical and time-sensitive departments and services</p> <p>Considerations for Implementation</p> <ul style="list-style-type: none"> Once the areas that require a full business continuity plan are identified consider what, if any, type of plan document the non-time critical departments and services require. Consider using the workshop method to help the time critical departments and services with their plan updates. 	<p>Action Plan: Management agrees with recommendation. Work is already underway.</p> <p>Accountability: Emergency Management Team.</p> <p>Timeline: 2025 Q3</p>

#	Observations	Maturity Rating	Recommendations and Considerations	Management Response
	<p><u>Recovery Planning</u></p> <ul style="list-style-type: none"> • A recovery plan annex has been established, providing a foundational framework for execution of the recovery. • The annex provides a good start point for more detailed planning and has identified the committees required in recovery. However, there is an opportunity to expand this annex into a more fulsome and functional plan. 	<p>Medium</p>	<p><u>Recommendation:</u> Leveraging the existing Recovery Plan Annex as a starting point, develop a detailed and potentially stand-alone recovery plan. document be developed.</p> <p>Considerations for Implementation</p> <ul style="list-style-type: none"> • In planning consider the complexities of the recovery phase and the fact that recovery operations may need to occur concurrent to response and could continue long after response has concluded. • Develop process documentation and specific tools and templates to provide structure and help guide recovery efforts. • Identify committee leads and provide them with training to prepare them for their roles in the recovery phase. 	<p>Action Plan: Management agrees with recommendation. Draft has been initiated. Work is ongoing.</p> <p>Accountability: Emergency Management Team.</p> <p>Timeline: 2026 Q2</p>

#	Observations	Maturity Rating	Recommendations and Considerations	Management Response
4	<p><u>Sustainment and Continuous Improvement</u></p> <ul style="list-style-type: none"> The City's exercise and training program is a significant strength in the overall emergency management program. It is well-structured, comprehensive, and consistently praised by those involved. This program ensures that all personnel are well-prepared to execute their emergency response roles effectively and helps foster and sustain the City's emergency management culture. The individual training programs are meticulously designed, leverages external service providers, and provides tailored training that ensures each participant is adequately prepared for their specific responsibilities during an emergency. Interviewees unanimously noted their confidence in their training and readiness. In addition to the annual exercise, the City has effectively leveraged real events as training opportunities for EOC staff. This approach not only reinforces the practical skills needed during emergencies but also provides valuable lessons that can be applied to future scenarios. 	High	<p><u>Recommendation:</u> Sustain and Maintain</p> <p>Consideration:</p> <p>With the inherent time and effort required for emergency management and business continuity exercises the City should consider leveraging external resources and consultants to assist with exercise planning. With their experience level, the City's emergency management program leaders should continue to be the overall leads for exercises and the external resources used to supplement, but not lead, exercise planning efforts.</p>	<p>Action Plan: Management agrees with recommendation.</p> <p>Accountability: Emergency Management Team.</p> <p>Timeline: Ongoing</p>

APPENDIX A – LIST OF INTERVIEWEES

No	Position/Department	Interviewee(s)
1	Manager, Emergency Management	Andre Beauregard
2	Manager, Emergency Management	Henry Klausnitzer
3	Manager, Procurement and Supply Operations	Todd Turner
4	Deputy City Manager, Enterprise Supports	John Paradis
5	Director Of Finance	Kyle Murray
6	Division Manager, Sewer Operations	Brad Weber
7	Division Manager of Stormwater	Shawna Chambers
8	Mayor, City of London	Josh Morgan
9	Director of Emergency Management and Security Services	Paul Ladouceur
10	Member of EOC Policy Group, Acting City Manager	Kelly Scherr
11	Member of EOC Policy Group, Deputy City Manager	Kevin Dickens

APPENDIX B – REPORT DISTRIBUTION LIST

This report was distributed to the following parties:

City of London
To:
Paul Ladouceur, Director of EM and Security Services
John Paradis, Deputy City Manager, Enterprise Supports
MNP LLP
Cliff Trollope, Engagement Partner
Deepak Jaswal, City of London Internal Audit Lead
Ahmed Ashraf, Senior Consultant