City of Mississauga
Internal Audit Report

CITY MANAGER'S DEPARTMENT
FIRE & EMERGENCY SERVICES DIVISION
PROFESSIONAL DEVELOPMENT & ACCREDITATION SECTION
MFES TRAINING AND ACCREDITATION AUDIT

November 16, 2023

City Manager's Department
Internal Audit Division

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BACKGROUND

The Professional Development & Accreditation (PD&A) Section is responsible, amongst other duties, for providing operational training to over 800 unionized front-line staff (by 2024) to ensure they are trained in various disciplines.

Front-line staff (e.g. firefighters) are required to comply with Ontario Regulation 343/22 – Firefighter Certification (O. Reg. 343/22) and certify against the National Fire Protection Association (NFPA) standards. One of the NFPA standards, and the focus of this audit, was NFPA 1006 – Standard for Technical Rescue Personnel Professional Qualifications (NFPA 1006 – Technical Rescue). Front-line staff are required to be certified NFPA 1006 – Technical Rescue by July 1, 2028.

The table below illustrates the 20 disciplines (i.e. programs) that collectively form NFPA 1006 – Technical Rescue. It further breaks down which disciplines are/are not part of O. Reg. 343/22 and which disciplines Mississauga Fire and Emergency Services (MFES) management has decided to train staff on based on the Community Risk Assessment that was conducted in 2019 and updated in 2023.

	Disciplines part of O. Reg 343/22	**Disciplines not part of O. Reg 343/22**
MFES staff to be trained on	- Confined space rescue - Ice rescue - Rope rescue - Structural collapse rescue - Surface water rescue - Swift water rescue - Trench rescue	- Common passenger vehicle rescue - Floodwater rescue - Heavy vehicle rescue - Machinery rescue - Tower rescue
MFES staff not to be trained on		- Animal technical rescue - Cave rescue - Dive rescue - Helicopter rescue - Mine & tunnel rescue - Surf rescue - Watercraft rescue - Wilderness search & rescue

The Professional Development & Accreditation (PD&A) Section is responsible for carrying out training programs for the twelve (12) disciplines under NFPA 1006 – Technical Rescue. The training program has both a written and practical component for each of the disciplines. The successful execution of the program requires coordination of a number of front-line staff (who

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work on shift, working 7 days a month), in addition to ensuring that training officers, proctors,
facilities and equipment are available.

SCOPE

The audit conducted an operational review of the NFPA 1006 – Technical Rescue training
program's sustainability, including compliance with accreditation requirements, recordkeeping
and monitoring for the period April 2022 to April 2023.

Out-of-scope
As the focus was on the operational review of the NFPA 1006 – Technical Rescue training
program's sustainability, the scope did not include risks related to:
- Delivery and quality assurance of the NFPA 1006 – Technical Rescue program to comply
  with the accreditation requirements;
- Training programs and records related to disciplines not specific to NFPA 1006 –
  Technical Rescue;
- Enterprise-wide governance around Learning Records Management System (LRMS)
  including system access, data privacy & security, copyright and intellectual property,
  acceptable use of the LRMS, user support & training, and content management.

OBJECTIVES

The audit was conducted in accordance with the International Standards for the Professional
Practice of Internal Auditing. The audit focused on the review of the adequacy of internal
controls that mitigate relevant risks related to the following business objectives:

A)   To ensure staff receive the certification and training in the disciplines specific to NFPA
      1006 as set out in Ontario Regulation 343/22: Firefighter Certification (O. Reg 343/22).
B)   To ensure an adequate/sustainable training plan is in place and sufficient resources
      are available to support and maintain the technical rescue training requirements in
      future years.
C)   To ensure the technical rescue records are complete, accurate and entered into the
      Learning Records Management System (LRMS) in a timely manner.
D)   To ensure pertinent information is available to facilitate informed decision-making as it
      relates to the technical rescue training program.

SUMMARY OF OBSERVATIONS

Based on the audit work performed, PD&A provides effective oversight of the NFPA 1006 –
Technical Rescue training program; however, certain processes remain manual and information
is maintained in a number of tools, which may limit the business area's ability to collect and
analyze data to support training requirements in the future. There is an opportunity to
streamline processes and consolidate data into a centralized master repository, enhancing the
management and monitoring of various training initiatives.

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Our main observations relate to formally documenting key processes and ensuring these documents are accessible, digitizing training-related documents, and consolidating data into a central master repository for all training processes.

Management noted that the processes and reporting today were not present two years ago, and the PD&A team has made significant progress in the development, implementation and management of their training programs. Our recommendations are intended to complement the ongoing work, streamline existing processes and ensure data integrity is maintained to support training programs.

A detailed list of observations and recommendations was provided to management. Appendix A outlines the detailed recommendations and management action plans. The main observations and recommendations are summarized below.

Formally document relevant processes and store all documents in an easily accessible location
Some documentation is available on the training programs as well as other administrative training documents; however, some key processes have not been documented. Although the established processes are generally operating well and staff involved know their roles within the processes, a holistic view of the critical processes is primarily known by one individual and is not documented.

The absence of clearly established and formally documented processes may result in knowledge gaps among staff and inconsistent recordkeeping practices. Moreover, to enhance understanding of key processes, training documents should be easily accessible, updated periodically and applicable staff should be trained. When only one individual knows the key processes associated with managing the training programs, it increases the risk of data loss and unavailability, which may jeopardize staff certification processes and lead to non-compliance.

Digitize training-related documents
To be certified to the NFPA 1006 – Technical Rescue standard, the Office of the Fire Marshal – Academic Standards and Evaluations (AS&E) provides content for the written (knowledge) and practical (skills) exam.

In the process of conducting practical exams, individual booklets (ranging from 2-16 pages for the NFPA 1006 – Technical Rescue program to up to 168 pages for other NFPA programs) are printed for each candidate. AS&E requires the results from the written and practical exam (approximately 2-5 pages of the booklet) to be electronically submitted for validation. Once the applicable documents are scanned and sent to AS&E, the scanned documents are retained on the City's network drive and printed documents are stored in a file room. Management noted that these documents have not been uploaded to a central repository due to technical challenges (e.g. character limitations, folder naming structure, etc.).

The network drive is only accessible by the employee and (with authorization) select Information Technology staff. In the event that the employee is absent for an extended period of time or permanently leaves the organization, it would be an onerous task to obtain access to the network drive, locate and determine if relevant documents existed, and the status to date.

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Physical documents are at risk of getting lost, damaged and/or destroyed, which can result in permanent loss of critical information. The process of locating specific information in physical documents can be time-consuming, inefficient and hinder collaboration and sharing. Moreover, securely storing and retaining physical documents requires physical space which may be costly in terms of real estate and security measures.

Consolidate data into a central master repository from all training tools
Various distinct processes exist to manage MFES staff training records. Although information is available in several tools including SharePoint, Excel documents and LRMS, a comprehensive central "master data repository" has not been implemented to capture and monitor relevant information from all training activities occurring at all levels within MFES.

Internal Audit observed that each tool presents its unique set of challenges such as aggregating data due to free-form fields, holistically identifying staff that have completed training (but have not completed the written and/or practical exam), and generating reports on partially completed programs.

Internal Audit noted that obtaining an overarching view of all ongoing and/or completed training was a challenging task. Due to the various tools used to oversee and monitor training-related activities, staff are unable to provide a comprehensive view of the status of any/all training activities for staff; they rely on many labour-intensive manual sub-processes to gather and report on the information.

The existing tools and processes focus on the type of training, which does not allow for a streamlined oversight of all the training programs. Transitioning to a comprehensive central "master data repository" for training-related information can provide management with operational efficiency, increased ability to plan, review, analyze, monitor and manage training requirements, data consistency and accuracy.

CONCLUSION

The control environment in PD&A is generally well-established related to oversight; however, to ensure long-term sustainability of the training programs, improvements are recommended in areas related to documenting relevant processes and storing the documents in an easily accessible location, digitizing training-related documents, and consolidating data into a comprehensive central master repository from all existing training tools.

Management has indicated that Budget Requests for a Division Chief (to assist with administration of the Division), a PD&A Data and Records Analyst (to coordinate on-line learning, records management and integrated technology) and additional Training Officers (to improve overall capacity) have been submitted. Management noted that these positions will be necessary to improve the significant documentation issues noted in this audit, which has been impacted by 3 of the 15 PD&A staff who are currently on extended leave.

A total of four (4) recommendations resulted from this audit. Three (3) relate to safeguarding of assets and information, and one (1) improves the efficiency and effectiveness of the process.

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Management has completed one recommendation, and agreed to complete one (1) by
December 2024, and the remaining two (2) by June 2025.

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Summary of Audit Recommendations

Rec	Recommendation	Priority (H/M/L)	Comments/Status	Classification
1	That documentation related to management of training programs be formally developed. This may include, but not be limited to, process flows, Standard Operating Procedures (SOPs), manuals, templates, check-lists, etc. The documentation should reside in an accessible and central location to enhance information sharing and mitigate risks associated with inconsistent documentation practices.	High	This is an accurate and well appreciated recommendation that we will work diligently to action. PD&A has encountered a number of challenges such as rebuilding the Section, extended staff absences, tremendous pressures of new provincial certification, new recruits, general rigours of staff training in high-risk work, etc.); we have not had the capacity to be able to both effectively deliver and ensure that all "back end" processes are as effectively designed and formalized. PD&A Section Chiefs are unionized employees and current collective bargaining agreement provisions limit the ability to improve succession planning and ensure redundancy. The ability to utilize secondments would better allow us to build organizational depth and improve succession planning, but will require changes to existing collective agreement language. There are multiple Training Officers on long-term leaves and the capacity has not existed to be able to complete this work, but it is part of the Division's work plan and will be targeted as a high priority. The Target Due Date is achievable if additional resources and support are provided. To be completed by June 30, 2025.	Efficiency and Effectiveness
2	That document management be enhanced through digitization of physical documents. This may include, but not be limited to, creating electronic files for each candidate enrolled in the respective program, printing only the essential pages for candidates to complete, scanning and attaching filled paperwork to the candidate's electronic file upon successful completion of the	High	The following steps will be taken: • Ensure that information is saved to a shared drive, not a personal J: drive (and transition all old information) • Ensure that written materials are secured at all times (resolve the issue of the unlocked office) • Transition theory testing from scantron sheets to electronic testing on iPads • As part of the response to Recommendation #1, digitize all work to the degree possible	Safeguarding of Assets and Information

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	practical exam, etc. The transition is expected to improve efficiency, reduce risk of loss/damage, improve collaboration, increase access control and release physical storage space.		To be completed by December 31, 2024.	
3	That PD&A work with Corporate Security to include the Deputy Chief of PD&A as an authorized member to periodically (i.e. annually) review who has access to the locked rooms as they are ultimately responsible for the maintenance, retention and security of the physical documents. Reviewing access periodically will ensure unauthorized access is removed, decrease risk of theft/loss/damage and provide oversight.	Low	Immediately, the list of people with access to the training records storage will be verified and the Deputy Chief of Training & Technology will be added as an authorized member. PD&A will work with Corporate Security to include the Deputy Chief of PD&A as an authorized member to periodically (i.e. annually, or more often as required) review who has access to the locked rooms as they are ultimately responsible for the maintenance, retention and security of the physical documents. To be completed by November 30, 2023. This recommendation has been completed.	Safeguarding of Assets and Information
4	That the number of tools being utilized be minimized, a central master data repository be adopted to capture training-related information (as determined for each training initiative) and to function as the "single source of truth" for information related to all training initiatives. The transition will assist in minimizing risks related to utilization of multiple tools such as potential administrative errors, data consistency and accuracy and operational efficiency, ultimately enhancing informed decision-making and identifying areas for improvement.	High	Like Recommendation #1, this is a recommendation that we fully agree with, but do not currently have the capacity to action. There is such a large volume of training being delivered to an estimated 800+ people by 2024 by a very small Division which has little internal background on modernizing processes through technology. As capacity allows, we will undertake the necessary work to: • Improve the staff training roster by automating the staff on leave so that the roster remains up to date • Continue to engage Learning & Development to produce higher quality regular, custom reports • Modernize processes to transition to a comprehensive master records repository The Target Due Date is achievable if additional resources and support are provided. To be completed by June 30, 2025.	Safeguarding of Assets and Information