GUIDE FOR INSPECTED ORGANIZATIONS

PREPARING AN ACTION PLAN AND FOLLOWING UP ON RECOMMENDATIONS

Votre gouvernement

Québec

Coordination and writing:
Direction générale adjointe de l’audit interne, des enquêtes et de l’inspection

For additional information:
General enquiries
Ministère de la Sécurité publique
Tour du Saint-Laurent
2525, boul. Laurier, 5th floor
Québec (Québec) G1V 2L2
Telephone : 418 646-6777

ISBN 978-2-550-95594-8 (PDF)
(French edition: ISBN 978-2-550-95593-1)

Legal deposit - Bibliothèque et Archives nationales du Québec, 2023

BSM-044A (2023-09)_v6

TABLE OF CONTENTS

PREAMBLE

As per the provisions of the Police Act (R.S.R.Q., c. P-13.1), the Minister of Public Security ensures a general inspection service with regard to the police forces under its jurisdiction and special constables. This service is provided by the Direction générale adjointe de l'audit interne, des enquêtes et de l'inspection (DGAAIEI), a directorate mandated to carry out inspections and follow up on the recommendations it makes.

Section 274 of the Police Act stipulates that:

"Following an inspection, the Minister shall transmit recommendations either to the director of the police force and, if the police force is a municipal police force, to the municipality, or to the competent authority in respect of the special constable, and request that action be taken in response to the recommendations within the time determined by the Minister.

The director of police, the municipality or the competent authority in respect of the special constable must, once that time has elapsed, report to the Minister on the action taken."

Who is this guide for ?

This guide is intended for the persons responsible for the development and follow-up of the respective action plans of municipal and Indigenous police forces, the Sûreté du Québec, specialized police forces and agencies that hire special constables.

OBJECTIVE

This guide facilitates action plan development and introduction by allowing inspected organizations to review the steps in the preparation and follow-up of action plans.

GENERAL PRINCIPLES

Compliance with the recommendations issued is a thorough process that requires inspected organizations to take the necessary steps to ensure that recommendations are implemented.

The purpose of the action plan and subsequent follow-up is to ensure the application of the issued recommendations and by extension, make sure the corrective measures taken allowed for rectifying any shortcomings observed.

Each inspected organization must develop corrective measures that will be examined to determine whether they meet the desired objectives. Progress with regard to the measures' introduction is reviewed annually, on the anniversary date of the first action plan's submission, which is usually within three months of the final inspection report's transmission. The timeframe deemed reasonable for fully implementing all of the corrective measures is around three years, but some recommendations call for a speedier introduction by inspected organizations, based on the risks identified during the inspection.

INFORMATION SECURITY

As is the case for the inspection report, the file comprising the action plan is password-protected. This password is provided by the DGAAIEI secretariat officer.

Good practices:

- Safely store the password to ensure it remains confidential.
- Send the action plan by e-mail, making sure the document has been encrypted with the provided password.

This action plan and its review by the DGAAIEI are confidential and may not be publicly disclosed without the prior written authorization of the DGAAIEI director.

METHOD TO ADOPT

The inspected police organization must use the file received in electronic format to prepare and submit its action plan.

No other action plan template of any sort may be used.

The person responsible for establishing the necessary corrective measures must be able to consult the inspection report, to notably ensure that the measures proposed address all problematic issues.

The inspected organizations, in turn, must strive to provide supporting documents attesting to the corrective measures introduced to address each of the recommendations. These supporting documents must be directly inserted into the column for this purpose in the action plan.

ROLES AND RESPONSABILITIES

INSPECTED ORGANIZATION	DIRECTION GÉNÉRALE ADJOINTE DE L'AUDIT INTERNE, DES ENQUÊTES ET DE L'INSPECTION
1. Assign a person to oversee the action plan's development and subsequent follow-up. Send this person's contact details to **BSM-DVIEI@msp.gouv.qc.ca** so that they can participate in an information meeting.	1. Provide the person responsible for the action plan's development with details as to the process for preparing the plan and the subsequent follow-up on the progress made (information meeting) and compliance with recommendations.
2. Use the template provided to prepare the action plan so that it addresses the recommendations made.	2. Review the planned corrective measures in the action plan, and the application of recommendations as attested to through progress reports.
3. Implement the corrective measures provided for in the action plan.	3. Share its review of the proposed or implemented corrective measures with departmental authorities.
4. Prepare and transmit, in compliance with the established deadlines, progress reports regarding the action plan and all relevant supporting documents.	4. Apprise departmental authorities of any major issues.

ACTION PLAN FOLLOW-UP: **4 PHASES**

PHASES	STEPS	RESPONSIBLE ENTITIES
A. Development of the action plan	1. Transmission of the inspection report, the action plan template and guide	**DGAAIEI**
	2. Identification of a person responsible for the action plan and the follow-up of recommendations	**Inspected organization**
	3. Information meeting	**Inspected organization and DGAAIEI**
	4. Drafting and transmission of the action plan and supporting documents	**Inspected organization**
B. Review of the progress with regard to the action plan	5. Analysis and transmission of the action plan	**DGAAIEI**
C. Rendering of accounts	6. Submission of reports to departmental authorities	**DGAAIEI**
D. Closing of the action plan	7. Proposal regarding the closing of the action plan	**DGAAIEI**
	8. Closing of the action plan	**Departmental inspections committee**

PHASE A: DEVELOPMENT OF THE ACTION PLAN

Step 1 Transmission of the inspection report, the action plan template and the guide

The inspection report is transmitted to the authorities governing the inspected organizations and the inspected organization's director.

At the time of the inspection report's transmission, the director's organization receives the document concerning the "Action plan" (follow-up of recommendations) and this guide.

The action plan template includes the recommendations issued in the inspection report.

Step 2 Identification of a person responsible for the action plan and the follow-up of recommendations

Within 15 days of receiving the inspection report, the action plan template and this guide, the director of the inspected organization must submit the name and contact details of the person responsible for follow-up with regard to the recommendations to BSM-DVIEI@msp.gouv.qc.ca.

The person responsible for the action plan's overall coordination should have the necessary authority to ensure the follow-up and implementation of all planned corrective measures. Overall responsibility for the action plan is critical to the coordination of the plan's implementation, follow-up regarding progress of the works and rending of accounts to the department.

Step 3 Information meeting

The DGAAIEI's designated inspector holds an information meeting (virtually or over the telephone) with the person responsible for development of the action plan named by the organization. They will explain the follow-up process as regards recommendations and the department's expectations in conjunction with the action plan. This meeting is held before the organization drafts the action plan.

Step 4 Drafting and transmission of the action plan and supporting documents

4.1. Drafting of the action plan

The action plan template to fill out is as follows:

Ministère de la Sécurité publique
Québec
Direction générale adjointe de l'audit interne, des enquêtes et de l'inspection

ACTION PLAN

(Follow-up of recommendations)

Names of the inspection themes

XXX police department

Contact details of the responsible entities		
police force	First and last names Role	Contact details (telephone and e-mail) of the person responsible for the action plan
DGAAIEI Analysis division	First and last names Role	Contact details (telephone and e-mail) of the DGAAIEI inspector

Follow-up step	Planned date	Actual date
First follow-up		
Second follow-up		
Third follow-up		

Recommendation		To be completed by the person responsible for the action plan				For DGAAIEI use only	
		Planned corrective measures and comments	Role of the person responsible for the corrective measures	Planned deadlines	Supporting documents	DGAAIEI comments	Status of the recommendation
1							

The section entitled "Contact details of the responsible entities" must include the following information:

- first and last names of the person responsible for the action plan at the organization;
- their role;
- their contact details.

In the section "Dates for transmitting the action plan to the DGAAIEI", the various deadlines established by the DGAAIEI, including that for the action plan's transmission, are noted in the column "Planned dates". The first follow-up is slated at 3 months after the receipt of the report and the action plan template, and the second and third ones at the one- and two-year marks (respectively) following the transmission of the first follow-up of the action plan to the DGAAIEI. The column entitled "Actual dates" is reserved for use by the organization. The dates to enter must correspond with the actual dates of transmission of the action plan to the DGAAIEI.

Good practices:

- Follow-up is generally carried out on an annual basis (planned dates are indicated in the table entitled *Dates for transmitting the action plan to the DGAAIEI*). Actual dates of follow-up, however, can be modified (earlier or later), based on several factors and following discussions between the person responsible for follow-up and the DGAAIEI inspector.
- The action plan must include the planned corrective measures, the role of the person responsible for the corrective measures and the planned deadlines.
- Supporting documents regarding the corrective measures must be included, whenever possible, for each recommendation in the action plan.

The section entitled "Recommendations" indicates each of the recommendations noted in the inspection report.

Sections in blue correspond to information that must be provided by the person responsible for the action plan. As for Indigenous police forces, the Direction des affaires policières autochtones (DAPA) will offer any necessary support and assistance as regards establishing necessary corrective measures (see Appendix A).

To be completed by the person responsible for the action plan			
PLANNED CORRECTIVE MEASURES AND COMMENTS	ROLE OF THE PERSON RESPONSIBLE FOR THE CORRECTIVE MEASURES	PLANNED DEADLINES	SUPPORTING DOCUMENTS

Planned corrective measures and comments from the inspected organization

The person responsible for the action plan must list the different corrective measures proposed to comply with the recommendations and correct problems identified in the inspection report.

Good practices:

- In the section entitled "Planned corrective measures and comments", enter the date on which the person responsible drafted the action plan.
- Briefly identify the anticipated or adopted measures.
- Remember to address each of the problems noted.
- Define the outcome of each action (example: review a given procedure to ensure that it meets the conditions outlined in the Guide des pratiques policières).
- When there are several corrective measures, number each of the planned measures.
- When the implementation timeframe for a corrective measure is in excess of 12 months, indicate the interim steps that will precede and culminate in the measure's introduction.
- When appropriate, provide a control mechanism to evaluate the corrective measure.

Ensure that the measures are both adequate and relevant.

Role of the person responsible for the corrective measures

Having someone responsible for the corrective measure is an important factor in the measure's implementation.

Good practices:

- In the section entitled "Role of the person responsible for the corrective measures", enter the role of the person responsible for each action.
- Ensure that the responsible person knows their role well.

Avoid providing the name of the person responsible; instead, note their title or role (examples: captain of the investigations unit, person in charge of evidence).

Planned deadlines

The corrective measures are written so as to facilitate their implementation within a reasonable timeframe.

Good practices:

- In the section entitled "Planned deadlines", enter the anticipated date for achieving the objectives sought by the recommendation. This deadline is usually the same as the date for fully implementing the recommendation.
- Logically determine the order in which the corrective measures will be taken.
- Whenever the timeframe for a given corrective measure is in excess of 12 months, plan various interim steps (with deadlines).

Ensure that the timeframes are realistic.

Supporting documents

Whenever possible, the corrective measures introduced must be accompanied by supporting documents.

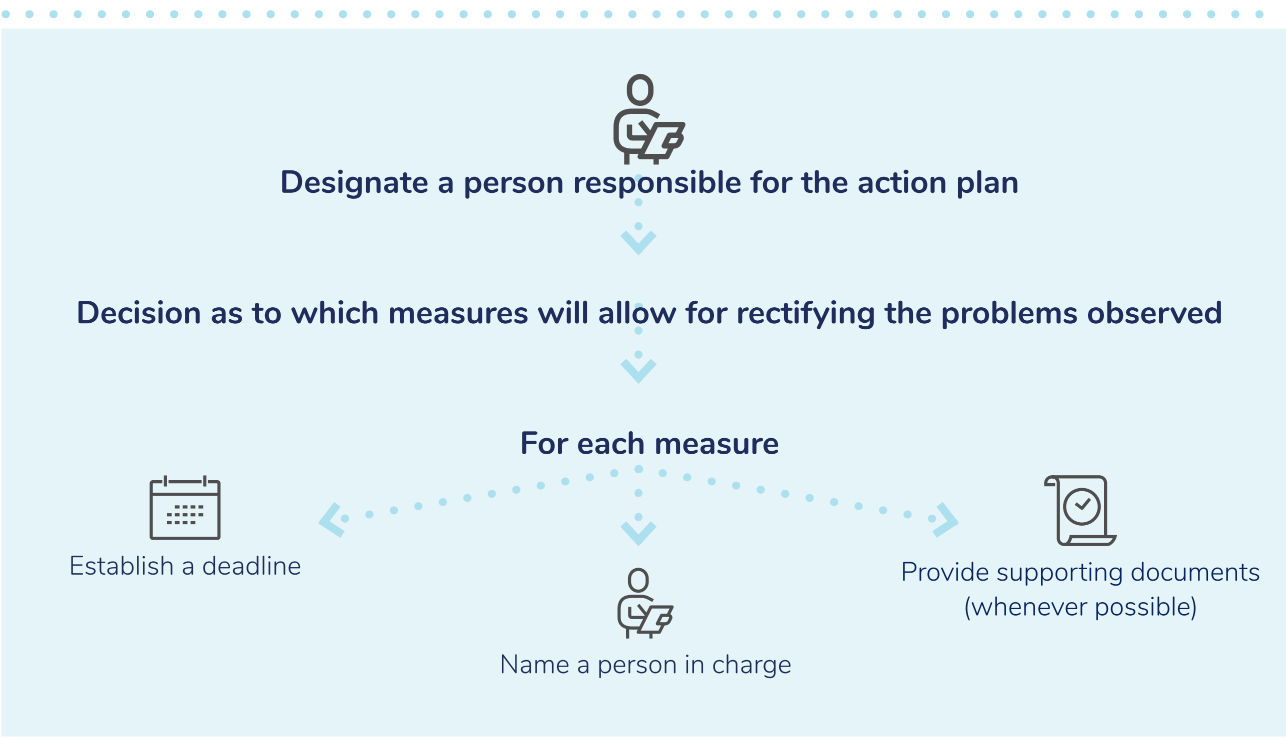
> **Good practices:**
>
> - In the section entitled "Supporting documents[1]", include the documents associated with the corrective measure (examples: procedures, report of various notes, meeting minutes, photographs of a facility, invoice for equipment purchases).

4.2. Transmission of the action plan to the DGAAIEI

Once completed, the action plan must be encrypted[2] by using the password transmitted by the secretariat officer of the DGAAIEI and sent to BSM-DVIEI@msp.gouv.qc.ca.

Should an organization require more than 15 days of additional time, i.e., beyond the deadline established for completion of the action plan, it must submit a request in this regard to the DGAAIEI director at BSM-DVIEI@msp.gouv.qc.ca. If the additional time required is no more than 15 days, the organization can reach an agreement as to a new deadline with the DGAAIEI inspector responsible for following up on the action plan.

Overview of the action plan's development



1. The procedure to follow for inserting supporting documents is discussed in Appendix B.
2. The procedure for protecting a document with a password is explained in Appendix C.

PHASE B: REVIEW OF THE PROGRESS WITH REGARD TO THE ACTION PLAN

Step 5 Analysis and transmission of the action plan

5.1. Analysis of the action plan

Once the action plan is received, the DGAAIEI inspector will analyze it. In the section reserved for this purpose (in grey), they will include comments and a note as to the status of the recommendation.

For DGAAIEI use only

DGAAIEI COMMENTS	STATUS OF THE RECOMMENDATION

DGAAIEI comments

The DGAAIEI inspector assigned to the analysis of the action plan checks whether:

- corrective measures have been provided for each recommendation;
- the measures proposed allow for addressing the recommendation in question and correcting the problems observed;
- the measures are relevant and adequate as regards correcting the problems observed;
- one or more persons have been identified as responsible for the corrective measures;
- the deadlines established are reasonable.

DGAAIEI practices

- The inspector can ask the person responsible for the action plan to provide further details on the proposed corrective measures or more specific information regarding the scope and objective of the measures if their adequacy appears uncertain.
- The inspector wraps up his analysis by indicating the type of information needed during the next follow-up, if applicable.

Status of the recommendation

The DGAAIEI inspector assigned to the analysis of the action plan recommendations establishes and assigns a status (from among those below) to each recommendation:

Fully realized: The recommendation was fully satisfied;

Globally realized: The recommendation was for the most part satisfied;

Partially realized: The organization reported having introduced corrective measures but the established deadline has passed. If this is not the last follow-up regarding the action plan, the DGAAIEI inspector can ask the organization to continue working towards the objectives;

Underway: The organization is in the process of introducing corrective measures and the deadline has not yet passed;

Pending: The organization has begun introducing corrective measures but their implementation has been suspended;

Not realized: The organization has not taken any steps with regard to the recommendation in question;

Unable to offer an opinion: The information received does not allow for offering an opinion regarding the steps taken, if applicable, with regard to the recommendation;

Not applicable: The recommendation no longer applies to the inspected organization. Following up is thus no longer relevant.

DGAAIEI practices

- The DGAAIEI inspector notes his opinion under “Status of the recommendation”.
- If a recommendation includes sub-recommendations (example: a, b and c), the status is assigned based on a general review of all elements.
- Before assigning one of several specific statuses (Fully realized, Globally realized, Partially realized, Underway or Pending), the DGAAIEI inspector ensures that the supporting documents received or the information transmitted are comprehensive, sufficient and relevant. If not, a status of Not realized or Unable to offer an opinion is usually awarded, as the case may be.
- When the inspector finds that for some reason (among them difficulty understanding a given recommendation), one of the measures proposed by an organization is inadequate, he immediately advises the latter.
- Along the same vein, should the inspector consider that certain corrective measures have not been adequately explained by an organization, or if some of the supporting documents are missing, the inspector contacts the person responsible for the action plan to request further information.

5.2. Analysis and transmission of the action plan

Once the action plan has been reviewed and analyzed, the DGAAIEI inspector sends a written communication to the director of the inspected organization to share the outcome of his analysis. If certain recommendations have not been fully implemented when the first follow-up of the action plan is transmitted by the organization, annual follow-ups are carried out on the anniversary date of the action plan's submission to the DGAAIEI. Depending on the circumstances, the deadline may be shortened or extended. In all cases, the deadlines are recorded in the section entitled "Dates for transmitting the action plan to the DGAAIEI" and in the written communications sent by the DGAAIEI inspector to the director of the inspected organization.

When transmitting the analyzed action plan, the information is protected using the previously provided password.

5.3. Subsequent follow-up of the action plan

During its implementation of the corrective measures, the inspected organization must submit progress reports to illustrate that the recommendations noted have been addressed.

Hence, during subsequent follow-ups, the person responsible for the action plan will need to provide detailed information on the corrective measures adopted, **based on the information previously recorded**. This is done by entering the date on which the action plan was completed, a step that will facilitate future analyses by the DGAAIEI inspector.

To carry out subsequent follow-ups, the person responsible for the action plan refers to the information in step 4, "Drafting and transmission of the action plan and supporting documents".

To know the date of the next planned follow-up, the person responsible for the action plan must check the box entitled "Dates for transmitting the action plan to the DGAAIEI" as well as the review document submitted to the director of the inspected organization.

To be completed by the person responsible for the action plan			
PLANNED CORRECTIVE MEASURES AND COMMENTS	ROLE OF THE PERSON RESPONSIBLE FOR THE CORRECTIVE MEASURES	PLANNED DEADLINES	SUPPORTING DOCUMENTS
2022-01-01			
2023-01-01			

Upon receiving the updated action plan day, the DGAAIEI inspector completes the sections reserved to him. He then carries out the subsequent analyses as per the same criteria as those determined in step 5, entitled “Analysis and transmission of the action plan”. He notes the dates of these analyses so as to facilitate future follow-up.

For DGAAIEI use only

DGAAIEI COMMENTS	STATUS OF THE RECOMMENDATION
2022-04-01	
2023-04-01	

PHASE C: RENDERING OF ACCOUNTS

Step 6 Submission of reports to departmental authorities

As regards the police forces inspected, the DGAAIEI prepares progress reports on their action plans twice a year; these reports are submitted to the Departmental inspections committee for the province's police forces, which is presided by the deputy minister.

This rendering of accounts allows departmental authorities to obtain information on the implementation of corrective measures and the implementation rate of issued recommendations subsequent to inspections. As the case may be, it can also allow these authorities to remain apprised of all problems with regard to the follow-up of recommendations.

PHASE D: CLOSING OF THE ACTION PLAN

Step 7 Proposal regarding the closing of the action plan

The closing of actions plan is proposed by the DGAAIEI to the Departmental inspections committee for the province's police forces. Whenever problems are not fully resolved, they are addressed by means of a special initiative.

Step 8 Closing of the action plan

The Departmental inspections committee for the province's police forces is responsible for approving the closing of action plans. The closing of an action plan is confirmed by sending to the director of the inspected organization[3] a letter and action plan mentioning *Closing of the action plan by the Departmental inspections committee for the province's police forces* and the date on which said initiative was approved. This letter is also sent to departmental, municipal and Aboriginal authorities, as the case may be[4].

3 For organizations with special constables, the DGAAIEI submits its proposals regarding closing to the deputy minister for approval. The closing of an action plan is ratified by the deputy minister and confirmed by a note. The action plan is transmitted with the mention *Closing of the action plan* and the date on which the initiative was approved.

4 For the Sûreté du Québec and specialized police forces, the letter concerning such a closing is only sent to department authorities.

APPENDIX A

Role of the Direction des affaires policières autochtones

- Offers Indigenous police forces any necessary support and assistance as regards the development of the action plan.
- Cooperates with Indigenous police forces to identify the proposed corrective measures.
- Seeks the cooperation of the Quebec Association of First Nations and Inuit Police Directors when needed to help the Indigenous police forces prepare their action plan.

APPENDIX B

Inserting a file in a Word document

To insert a file in a Word document, you must:

- Click on the Insert tab.
- Click on the Object icon in the Text group.
- Click on Object again, then on the tab Create from File.
- Click on the Browse button.
- Find the file (PDF or other format) to add, then click on Insert.
- Check, in the dialogue box, the option Display as icon.
- Click on OK.

Good practice:

Name the document with the title of the corrective measure to make it easier to find.

APPENDIX C

Protecting a document with a password

- Open the document.
- Select the File tab.
- Click on Info.
- Click on Protect document.
- Click on Encrypt with password.
- Enter the password received from the secretariat officer.
- Click on OK.

Sécurité publique
Québec