

# **Follow-Up Audit of Exhibit Control**

## **Final Vetted Report**

### **November 2023**

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## List of acronyms

FS&IS	Forensic Science and Identification Services
OM	Operational Manual
PROS	Police Reporting and Occurrence System
RCMP	Royal Canadian Mounted Police
ULQA	Unit Level Quality Assurance

## Executive summary

### Background

Exhibit control is a primary policing activity. For exhibits to retain their evidentiary value, their integrity must remain intact. The prosecution must be able to prove that the exhibit presented in court is the one originally seized. All handling and movement of exhibits must be well documented including the date, time, and signature of anyone who handled the items. This “chain of custody” must be traceable from the time of initial seizure until the time they are presented in court proceedings and subsequently disposed.

An exhibit can be any property, which may have evidentiary value, seized by a regular member in the course of an investigation. Examples of exhibits include:

- biological/trace evidence, clothing
- tire tread marks, vehicles
- firearms, drugs, currency
- an electronic device used to capture and process data, and the data itself

There are over 680 Royal Canadian Mounted Police (RCMP) detachments across Canada that maintain exhibits as part of regular policing duties. There are also specialized policing services, such as Forensic Science and Identification Services and Digital Forensics Sections, which provide investigative support services to process and analyse exhibits on behalf of other investigational units. These include DNA analysis, ballistics identification, analysis of electronic devices and data held within them.

### Why this is important

Having a strong control framework in place over exhibit management is critical to preserve the evidentiary value and integrity of exhibits, which contributes to the RCMP’s ability to deliver on its operational mandate.

Mismanaged exhibits can have a negative impact on court proceedings, create liability for seized personal property, increase health and safety risk to employees, and cause reputational harm to the RCMP.

Ensuring roles and responsibilities are clear, policies are up-to-date, compliance monitoring is robust and training and tools are in place would assist to mitigate some of the risks impacting exhibit control.

## Audit objective and scope

The objective of this audit was to assess the adequacy of the processes and practices used within the RCMP to control exhibits and to determine the level of compliance with relevant policies. The audit also assessed the implementation of the recommendations from the 2013 Audit of Exhibit Controls in Detachments to determine if issues raised in the audit have been addressed.

The scope of the audit included RCMP detachments in contract provinces, federal investigative units, and specialized forensic support services (such as National Forensic Laboratory Services and Advanced Digital Forensics Services).

The governance structure for exhibit management was assessed organization-wide. For the purpose of specific exhibit file testing, the audit focused on detachments and units using the Police Reporting and Occurrence System (PROS) as their records management system, and assessed the processes and procedures in place to maintain custody and control of exhibits from the moment of seizure up to and including disposal.

Audit testing focused on currency, firearms, drugs, DNA, and digital exhibits as they were identified as higher risk.

The time period in scope was from April 1, 2019 to March 31, 2022.

The audit did not examine processes and procedures carried out by non-RCMP organizations once the exhibits left RCMP custody (for example: Seized Property Management Directorate of Public Services and Procurement Canada).

## Findings

The following are high-level findings the audit team observed during the conduct phase of the audit. The detailed observations and recommendations are discussed further in the report.

### **Observation 1**

In general, while roles and responsibilities were found to be clearly documented and understood, there is still an opportunity to further enhance the clarity of the role of exhibit custodian and consistency in how the role is carried out.

### **Observation 2**

While exhibit policies were found to be in place to communicate expectations to employees, the handling of certain specialized exhibits requires additional guidance and policy updates to ensure risks are mitigated.

### **Observation 3**

Additional attention to the monitoring of exhibit controls is required to ensure oversight mechanisms are robust and exhibit handling practices are compliant with policies.

### **Observation 4**

Business continuity planning provisions for exhibits were not documented for all operational units sampled during the audit.

### **Observation 5**

While the current training framework supports the development of regular members in the area of exhibit management, there is a gap in training for non-regular members working in the role of exhibit custodian.

### **Observation 6**

Variability in how detachments are equipped to process and store exhibits increases the risk of degradation for those without the necessary tools.

### **Observation 7**

While overall compliance to policy and procedural requirements is strong, the audit identified a few areas that require additional attention to further enhance exhibit controls.

## Overall audit opinion

The RCMP has a governance framework in place to ensure exhibits are controlled and effectively managed. The framework includes structures such as policies, roles and responsibilities for a variety of employees involved in handling exhibits, as well as mechanisms to monitor procedural compliance.

However, there are opportunities to strengthen the framework by:

- enhancing the clarity of the role of exhibit custodian and ensuring/formalizing consistency in how the role is carried out
- providing additional guidance, training and updating policy for certain specialized exhibits
- strengthening the monitoring of exhibit control to ensure oversight mechanisms are robust and handling practices are compliant
- documenting business continuity plan provisions for exhibits in all operational units sampled during the audit

Addressing these areas will help mitigate risks related to gaps in training, variability in how detachments are equipped to handle high risk exhibits, and will help strengthen procedural compliance.

## Next steps

The management response and action plan developed in response to this report demonstrate the commitment from senior management to address the audit findings and recommendations. RCMP Internal Audit will monitor the implementation of the management action plan and undertake a follow-up audit if warranted.

## Management's response

Overall, Contract and Indigenous Policing is supportive of the findings and recommendations in the draft Follow-up Audit of Exhibit Control report. We will work collaboratively with Specialized Policing Services, Federal Policing and the Chief Financial Officer to implement a detailed action plan to address the findings. The Audit has determined that overall policy framework and infrastructure surrounding exhibit handling is being followed by the vast majority of RCMP employees. The common shortfall throughout the process appears to align with the specified unique exhibit types, oversight responsibilities and compliance functions.

Jodie Boudreau  
Deputy Commissioner, Contract and Indigenous Policing

Specialized Policing Services agrees with the findings of this audit. National Forensic Laboratory Services will continue to implement rigorous quality control programs, and Advanced Digital Forensic Services will review identified opportunities to strengthen exhibit controls. A detailed Management Action Plan includes specific initiatives and timelines to implement these recommendations.

Bryan Larkin  
Deputy Commissioner, Specialized Policing Services

Federal policing is in agreement with the findings. Federal Policing Operational Policy will update policies on highly toxic substances, search and seizure of drugs, drug exhibits, stockpiling drugs and cryptocurrency which will provide better guidance for supervisors and managers in monitoring the handling and movement of specialized exhibits.

Mark Flynn  
Deputy Commissioner, Federal Policing

## Background

### Audit context

An exhibit can be any property, which may have evidentiary value, seized by a member in the course of an investigation.<sup>1</sup> Exhibits can include, among other things, firearms, other weapons, currency, jewelry, clothing, biological/trace evidence, tire tread marks, vehicles, and illicit drugs. In a digital context, exhibit items can range from a computer or other electronic device used to capture and process data, to the data itself.

Exhibit control is a primary policing activity. Exhibits come into police possession in a variety of ways either with or without a search warrant, order, or authorization. Compliance with the *Criminal Code*, the *Canada Evidence Act*, and other federal/provincial statutes with respect to the continuity, reporting, and retention of seized exhibits must be ensured at all times.

Within the RCMP, a large number of programs and units manage exhibits in some form. There are over 680 RCMP detachments across Canada that maintain exhibits as part of regular policing duties. There are hundreds of specialized investigational units which handle and process exhibits as part of their core activities. These exhibits are used to assist in a wide variety of investigations, for example, those associated with illegal drugs, child exploitation, and integrated proceeds of crime investigations. There are also specialized policing services, such as Forensic Science and Identification Services and Digital Forensics Sections, which provide investigative support services to process and analyze exhibits on behalf of other investigational units. These include DNA analysis, ballistics identification, analysis of electronic devices and data held within them.

For exhibits to retain their evidentiary value, their integrity must remain intact. The prosecution must be able to prove that the exhibit presented in court is identical to the one originally seized. In addition, all handling and movement of exhibits must be well documented including the date, time, and signature of anyone who handled the items. This “chain of custody” must be traceable from the time of initial seizure until the time the exhibit(s) is

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<sup>1</sup> *Operational Manual* ch. 22.1 Exhibits – Processing.

presented in court proceedings and subsequently disposed. Accordingly, processes and practices must be in place to ensure that the seizure of all evidence is inventoried, stored, processed, and disposed of in accordance with both legal and policy obligations (the typical life cycle of an exhibit can be found in Appendix B).

In 2013, Internal Audit conducted an audit to assess the adequacy of the policies, processes and practices used within RCMP detachments to control exhibits and to determine the level of compliance with relevant policies. The audit concluded that policies, practices and processes were not sufficiently comprehensive, monitoring needed enhancement and storage capacity was not adequate. The audit issued two recommendations for which management action plans were implemented. Given that exhibit control remains a high-risk activity and it had been 10 years since the last audit, a follow-up engagement was included in the RCMP's Risk-Based Audit and Evaluation Plan 2021-2026.

## Objective, scope and methodology

### Objective

The objective of the audit was to assess the adequacy of the processes and practices used within the RCMP to control exhibits and to determine the level of compliance with relevant policies. The audit also assessed the implementation of the recommendations from the 2013 Audit of Exhibit Controls in detachments to determine if issues raised in the audit have been addressed.

### Scope

The scope of the audit included RCMP detachments in contract provinces, federal investigative units and specialized forensic support services (for example: National Forensic Laboratory Services and Advanced Digital Forensics Services). The governance structure for exhibit management was assessed organization-wide. For the purpose of specific exhibit file testing, the audit focused on detachments and units using the Police Reporting and Occurrence System as their records management system, and assessed the processes and procedures in place to maintain custody and control of exhibits from the moment of seizure up to and including disposal. Audit testing focused on currency, firearms, drugs, DNA exhibits and digital exhibits, as they were assessed as higher risk. The time period in scope was from April 1, 2019 to March 31, 2022.

The audit did not examine processes and procedures carried out by non-RCMP organizations once the exhibits left the custody of the RCMP (for example: Seized Property Management Directorate of Public Services and Procurement Canada). Additionally, the audit team did not verify if any non-compliance with respect to exhibit file testing had negatively impacted prosecutions.

### Methodology

The audit was conducted between March 2022 and April 2023. The audit team employed various techniques including interviews, walkthroughs, physical examinations of exhibits, file documentation and analytical reviews. Site visits were conducted at a total of 15 detachments in K, O, and J Divisions (five detachments per division were visited), the National Forensic Laboratory Services Ottawa Site, and Advanced Digital Forensics Services. A sample of 422 exhibits was assessed. Testing focused on exhibits identified as higher risk such as currency, firearms, drugs, DNA and digital evidence. A regular member assisted in assessing exhibit controls at the 15 detachments attended. Where possible, the audit team followed the end-to-end process for exhibits at detachments, at specialized forensic support services, and in the Police Reporting and Occurrence System. Detailed criteria are contained in Appendix A. The exhibit sample breakdown by type are in Appendix C.



## Statement of conformance

The audit engagement conforms to applicable standards in the Institute of Internal Auditor's International Professional Practices Framework and the Treasury Board of Canada Directive on Internal Audit, as supported by the results of the quality assurance and improvement program.

## Observations

### Governance

#### Observation 1

**Roles and responsibilities:** In general, while roles and responsibilities were found to be clearly documented and understood, there remains an opportunity to further enhance the clarity of the role of exhibit custodian and consistency in how the role is carried out.

#### **Documented roles and responsibilities**

The RCMP *Operational Manual Part 22 (Exhibits)* provides high-level definitions of the roles and responsibilities for various positions in the operational policing context (regular members, supervisors, exhibit custodians, detachment commanders). **Regular members** are responsible for the seizure, lawful custody, processing, and continuity of exhibits related to their investigations. **Exhibit custodians** at the detachment level primarily deal with the movement, physical safeguarding, and development of a record of the handling related to the particular exhibit.

**Supervisors** primarily provide guidance and a quality assurance role by ensuring all work related to an occurrence, including exhibits, is performed and executed in an appropriate and timely manner. **Detachment commanders** and management have relatively little direct involvement with exhibits (unless acting as a backup exhibit custodian), but rely on proper and appropriate supervision beneath them.

The exhibit custodian function is organized differently in each division and the custodian position is filled with various categories of employees. In federal and smaller contract detachments, the typical scenario is that a regular member works in the role of exhibit custodian in addition to their regular policing duties, while in larger contract policing detachments with a higher volume of exhibits, there is either a full time dedicated public service employee or municipal employee working as the custodian.

For exhibit custodians at detachments, the understanding of the importance of exhibit handling and exhibit management, including the confidence in the totality of their role was found to be stronger when a regular member (or other with previous policing experience) was in the position. This was likely due to their structured training at Depot and their experience as a regular member, which form a baseline of knowledge and experience with exhibits. Issues related to training for non-regular member exhibit custodians are further discussed under Observation 5.

By contrast, roles for Advanced Digital Forensics Services and National Forensic Laboratory Services employees which revolve around forensic analysis of exhibits for court purposes are further defined through specialized training and/or standard operating procedures specific to their environments. There were no noted gaps in roles and responsibilities at the National Forensic Laboratory Services and the Advanced Digital Forensics Services.

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#### **Implementation of recommendation 1 from the 2013 audit**

The 2013 Audit of Exhibit Controls in Detachments recommended clarifying and standardizing roles and responsibilities with respect to exhibits. This was addressed by including additional details with respect to roles and

responsibilities in *Operational Manual Part 22* and by requiring the role of exhibit custodian be defined in a job description.

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#### Observation 2

Policies: While exhibit policies were found to be in place to communicate expectations to employees, the handling of certain specialized exhibits requires additional guidance and policy updates to ensure risk is mitigated.

#### **National policy**

The national policy as contained in *Operational Manual (OM) Part 22 - Exhibits* forms the main overarching source of policy guidance for exhibit handling within the RCMP. A closely related part of the OM, Part 21 - Search and Seizure, stipulates the requirements related to legal authorities on searching and seizing property/exhibits. Other OM chapters supplement exhibit handling requirements by prescribing unique requirements for exhibits of a specific nature. For example, Part 6 of the OM contains specific policy requirements for drugs while Part 49 - Proceeds of Crime section 10 stipulates special procedures for the handling of cryptocurrency exhibits.

When interviewees in both contract and federal detachments visited were asked about their awareness of policies that govern exhibit activities, the large majority referred to the national OM (such as Part 22) as being the main source of authoritative guidance.

#### **Policy development process**

It was noted that there was a strong policy development process in place to ensure this foundational policy is regularly reviewed, updated and any relevant case law is considered as part of that process.

Contract and Indigenous Policing's Operational Policy and Compliance unit is the policy centre for OM Part 22 - Exhibits. All parts of the OM (including Part 22) undergo a periodic review process to ascertain the need for update. At a minimum, each part of the OM under the Operational Policy and Compliance unit's purview is reviewed for update once every five years.

The update process is extensive and ensures that stakeholders across business lines are consulted both at the working level and officer level (Legal Services, Federal Policing, Learning and Development, Depot, National Public Complaints Directorate, Occupational Health and Safety Branch, etc.). Mechanisms exist to address case law considerations. Legal concerns are brought to the Operational Policy and Compliance unit via Commissioner briefings, Civilian Review and Complaints Commission recommendations, Legal Services, and major court decisions.

#### **Divisional policy**

The audit team found that, with the exception of three divisions (National Headquarters, L and O), the majority of divisions had some form of policy contained in their respective operational manuals related to exhibits. Many of these divisional policies were generic and instead of prescribing its own unique set of requirements, referred the reader to the national policy. In other cases, the divisional policies were found to be very similar to the national policy with the difference being that the divisional policy referred to specific procedures to be followed that are unique to that particular division (such as the use of a specific divisional form, a specific location, specific contacts, etc.). While in some cases these divisional supplements "supplemented" national policy by being more prescriptive in nature, it was found that these additional requirements were in alignment with national policy.

#### **Unit-specific standard operating procedures**

Out of the 15 contract and federal detachments visited, as well as National Forensic Laboratory Services and Advanced Digital Forensics Services, seven (47%) had developed local standard operating procedures related to exhibits. In general, these local procedures provide guidance with respect to roles and responsibilities related to exhibit handling (such as role of investigator vs exhibit custodian vs detachment commander) and detailed procedural guidance unique to the particular detachment (for example: expectations surrounding storage, PROS tasking, handling requirements for specific types of exhibits, etc.). While the local policies, guidance and directives reviewed during the audit were more specific and prescriptive than national policy, they were found to generally align with it.

In addition to local formal standard operating procedures, many detachments visited had written processes posted in the exhibit processing room in an effort to ensure that investigators were complying with requirements.

For the National Forensic Laboratory Services, the audit team reviewed standard operating procedures applicable to the Evidence Management Unit of the laboratory which is responsible for receiving cases, generating initial service requests, entering tombstone data in the Laboratory Information Management System, storing exhibits and returning exhibits to investigating agencies. They were found to be thorough, well documented and recently updated.

For the Advanced Digital Forensics Services, standard operating procedures that relate to the general handling of exhibits were also reviewed. They were found to provide fundamental exhibit handling instruction for employees working within these services.

While the *Operational Manual (OM)* and its contents related to exhibits (Part 21/22) do not apply directly to the National Forensic Laboratory Services and the Advanced Digital Forensics Services, the contents of the local standard operating procedures align with the general principles espoused by the OM (for example: definition of roles and responsibilities, accuracy of data entry in PROS, safe storage, tracking of movement, maintenance of continuity, physical security, etc.).

#### **Drug exhibit policy**

During audit testing, the content of the currently published OM Part 6 – Drugs, which governs drug exhibits, was found to require updating. For example, the current OM Part 6 requires the submission of a Significant Drug Seizure Report (form 4063) to National Headquarters Drug Branch whenever a seizure of drugs meets a certain quantity. This requirement has not been in effect since 2013, but initial audit compliance testing carried out under the assumption that the form was required, resulted in erroneous conclusions since an outdated requirement was being assessed. There is also reference in OM Part 6 to requiring Health Canada approval for drug exhibit destruction. This requirement is no longer in effect, yet it, as well as references and broken hyperlinks to an outdated Health Canada form 3515 for reporting drug seizures, remain in the policy resulting in misleading guidance.

Outdated policy obligations can result in misalignment between practice and policy, which can be questioned in court or review proceedings. Federal Policing operational policy sector is aware of these issues and confirmed the future OM Part 6 update would address them.

#### **DNA/biological exhibits**

The audit identified the need to provide additional clarification with respect to the management of specialized exhibits such as DNA/biological at detachments. Interviewees raised the concern that additional guidance was required to better understand expectations with respect to the retention and/or storage of these types of exhibits.

The RCMP *Information Management Manual* Chapter 2.3 (section 6.6.5) states that for unsolved occurrences of a specific nature (such as homicide, sexual assault, missing persons) biological exhibits cannot be disposed of without judicial authorization. Related to the storage of sexual assault kits, traditionally these exhibits required refrigerated storage but some exhibit custodians reported that the requirement had changed in recent years and kits no longer

required refrigeration. The majority of interviewees were not aware of any changes to storage requirements and were of the understanding that refrigeration was required. Additional guidance could help clarify requirements and ensure the integrity of DNA/biological exhibits are preserved and storage is efficiently used.

### Observation 3

Monitoring and oversight: Additional attention to the monitoring of exhibit controls is required to ensure oversight mechanisms are robust and exhibit handling practices are compliant with RCMP policies and procedures.

#### **Unit-level monitoring mechanisms**

The audit determined that the first line of monitoring of exhibit handling is done by supervisors in their role to oversee policing operations carried out at the detachment. Watch commanders also play a role in ensuring exhibits are appropriately seized and handled, and that the necessary warrants and seizure authorizations (and completion of the required Report to Justice Form 5.2) are in place when exhibits are seized. It is the lead investigator's responsibility to ensure compliance with exhibit handling procedures for their own files and, if they require guidance, support is requested from the supervisor.

Once the lead investigator has notified the custodian that an exhibit is ready to be transferred/stored in the main exhibit locker, the custodian monitoring begins. This includes ensuring exhibits are appropriately packaged, labelled and initialed and followed up with investigators if corrections are needed.

These roles were found to be aligned with the requirements contained in national policy, namely OM - chapter 22.1 (sections 3.3.1 – 3.3.6).

A key monitoring requirement prescribed by national policy is for there to be a full inventory audit of exhibits at the detachment whenever a new exhibit custodian begins working in the role. Of the 16 units (detachments and Advanced Digital Forensics Services) visited to which the requirement would be applicable, 12 of 16 (75%) reported carrying out a full inventory audit of the exhibit room at the time the current unit's exhibit custodian began working in the role. It was noted that full inventory audits are a logistical challenge to carry out in larger detachments that have thousands of exhibits in their custody. [REDACTED]

#### Unit-level quality assurance (ULQA)

The ULQA process is internal to a unit and is initiated by the unit commander.<sup>2</sup> It involves risk ranking a number of operational activities and selecting a few to be reviewed throughout the fiscal year. Detachment commander and supervisor interviewees explained that the ULQA process is the one common approach to ensuring that exhibit compliance is monitored. However, exhibits are not necessarily reviewed every year under this process, and the frequency of ULQA review of exhibits at the unit level can vary significantly across detachments. Accordingly, they do not appear to be taking place frequently enough to provide timely feedback to unit commanders to the level of assurance they would desire.

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<sup>2</sup> RCMP *Administration Manual* ch. 18.2. (<http://infoweb.rcmp-grc.gc.ca/manuals-manuels/national/am-ma/18/18-2-eng.htm>)

### **Implementation of Recommendation 2 from the 2013 audit**

The 2013 Audit of Exhibit Control in Detachments included a recommendation related to enhancing monitoring of exhibits. It recommended that “Commanding Officers should ensure exhibit records are timely, accurate and complete as well as enhance the monitoring and oversight mechanisms used for exhibits including timely disposal.” In response, OM Part 22 was updated to include provisions for a mandatory ULQA on Exhibit Control. The new requirement was worded as follows: “Ensure that a unit level quality assurance (ULQA) review of exhibit control is mandatory and included annually within the ULQA review risking process.”

The audit’s assessment is that the wording of the requirement appears to be confusing and the mandatory nature of the ULQA is open to interpretation. For example, it is unclear if the requirement makes it mandatory for units to conduct an annual ULQA on exhibits or only include exhibits in the risking process each year, or possibly both.

To determine the actual frequency of ULQA activity, the audit obtained information from the sample of 16 units visited, as well as from broader national information from the Annual Performance Plan System. The current audit found that the frequency at which ULQAs take place is variable. Seven of the 16 units visited (44%) had conducted an ULQA on exhibits in the last year. It was reported that the COVID-19 pandemic may have contributed to a reduced frequency of ULQAs.

National ULQA data also confirmed that annual ULQAs on exhibit control are taking place infrequently across the organization. For the 2020-21 planning cycle, a total of 683 of the 750 (91%) annual performance plans included ULQAs. Of all the activities selected for ULQA, “exhibit control” was within the top three activities “risked-in” for fiscal year 2020-21. Based on the Annual Performance Plan System, 207 units carried out a ULQA exercise on exhibit control in fiscal year 2020/21, and 144 units did so in fiscal year 2021/22.

Although national ULQA information is collected and available through the Annual Performance Plan System, there is no monitoring of results at the national level. This is a missed opportunity to identify national trends, risk areas, and opportunities for improvement. Given organizational plans to decommission and replace the Annual Performance Plan System, this could make tracking this information even more difficult.

#### Management review

The purpose of a management review is to assess the adequacy and effectiveness of a unit’s management, investigative performance, and/or service delivery performance. Management review results are intended to provide assurance to the line officer that the unit is managed in accordance with the principles of policing and management in the RCMP.

While exhibit control is perceived as a high-risk activity, it may not necessarily be included in every management review conducted. Management reviews are carried out by divisional review services resources, who also determine the timing and frequency of reviews of individual units.

Only one of the 16 units visited had been reviewed as part of a management review in the last three years. As with ULQAs, it was reported that the COVID-19 pandemic may have contributed to a reduced frequency of management reviews in recent years.

#### National Forensic Laboratory Services

These services stood out as having an environment of robust oversight and monitoring. It has a rigorous quality assurance program in place given its requirement for external accreditation as a lab and its adoption of International Organization for Standardization standards. The environment is highly controlled by standard

operating procedures and there is a quality assurance group within the RCMP's Forensic Science and Identification Services which monitors compliance with most aspects of operations, including activities surrounding exhibit management. The quality assurance group monitors compliance with policies and internal standard operating procedures and provides assurance that work performed by the lab is in line with standards. The quality assurance group program also performs regular audits of lab operations. In addition, the lab also undergoes an external audit every two years by the Standards Council of Canada.

### **Systems monitoring**

Detachment exhibit custodians who work with the Police Reporting and Occurrence System (PROS) are granted an additional user role called "Storekeeper" that allows them to manage the electronic record keeping of exhibits for their detachments. This includes documenting exhibit movements and ensuring accuracy with respect to the chain of custody. The Divisional Operational Records Management units are responsible to grant and remove access of the storekeeper role based on requests from line management.

While every detachment tries to keep exhibit custodian access to a minimum, the audit team found that there was very limited monitoring in place to ensure the "storekeeper" role is removed from individuals when it is no longer required. This was identified as an internal control issue and should be addressed in order to ensure access and accountabilities are aligned and to reduce the risk of unauthorized access to exhibit management functionality within PROS.

### **Observation 4**

**Business continuity planning:** Business continuity planning provisions for exhibits were not documented for all operational units sampled during the audit.

A business continuity plan can enable the RCMP to mitigate the impacts of all-hazard events and to ensure the continued provision of critical services and assets in the support of front-line policing. It also contributes to the health, safety, and security of employees.

The audit expected units to have contingency plans for exhibits within their business continuity plans to ensure preparedness should there be a disruption to their regular operations.

### **Business continuity plans at detachments**

The audit found that, while 11 of the 15 detachments visited (73%) had business continuity plans that included provisions for exhibits, [REDACTED].

With respect to the plans which had provisions, exhibits were usually identified as part of the operational records required to help provide the critical service of "Overall Command of all Operational and Administrative functions" at a detachment.

[REDACTED]

### **Business continuity plans at the National Forensic Laboratory Services and the Advanced Digital Forensics Services**

Both the National Forensic Laboratory Services and Advanced Digital Forensics Services have business continuity plans with provisions for exhibits. [REDACTED]

[REDACTED]

## Conclusions related to governance

Overall, several themes emerged related to governance in the areas of policies, oversight and monitoring, and business continuity planning.

With respect to policies, opportunities exist to update OM Part 6 - Drugs to reflect new requirements related to the reporting of drug seizures within the RCMP and to Health Canada. There are also opportunities to clarify guidance for management of DNA/biological exhibits at detachments in order to avoid possible impairment to integrity of exhibits, or unnecessary use of cold storage.

On the topic of oversight and monitoring, while ULQA and management review activities are valuable monitoring functions to provide information on exhibit handling compliance, they do not appear to be taking place frequently enough to provide timely feedback to unit commanders. Greater clarity with respect to the mandatory nature of ULQA is required. Additionally, limited national monitoring of ULQA results in a missed opportunity to identify positive trends, risk areas and opportunities for improvement.

From a systems perspective, stronger monitoring over storekeeper access in PROS would help ensure appropriate alignment between access and accountabilities and decrease the chance of unauthorized access to exhibit management functionality within PROS.

For detachments where exhibits are not included in the business continuity plan, it is possible that exhibits could be overlooked as critical assets for which safeguards and contingencies need to be in place. This could lead to issues related to maintaining continuity of exhibits or their physical integrity (such as DNA exhibits requiring refrigeration).

## Why these findings are important

Having a governance framework for exhibit management is critical to preserve the evidentiary value and integrity of exhibits, which contributes to the RCMP's ability to deliver on its operational mandate.

Ensuring roles and responsibilities are clear, policies are up-to-date, compliance monitoring is robust, and training and tools are in place would assist to mitigate some of the risks impacting exhibit control.

## Recommendations related to governance

Policies should be updated to accurately reflect current procedures and expectations, including the issuance of additional guidance regarding long-term retention of exhibits and storage of specialized DNA exhibits.

Oversight of exhibits should be enhanced by:

- clarifying the current policy requirement for a mandatory yearly ULQA for exhibit control
- increasing monitoring of the granting/removal of the storekeeper role in PROS
- leveraging the national ULQA data related to exhibits
- assessing detachment business continuity plans for adequate provisions for exhibits

## Training, tools, and resources

### Observation 5

Training: While the current training framework supports the development of regular members in the area of exhibit management, there is a gap in training for non-regular members working in the role of exhibit custodian.

### **Training for investigators and supervisors**

Exhibit handling and exhibit management principles and requirements are introduced and continuously reinforced to cadets during their time at Depot, and further instilled during their first posting under the Field Coaching Program.

As part of regular operational duties, regular members are trained in investigative procedures and methods, seizure authorities, and the importance of maintaining continuity over exhibits. This ensures that the regular member has thorough experience with exhibits and exhibit management.

Additional training is provided for supervisors to exercise their supervisor role and functions within PROS.

### **Training for exhibit custodians**

Of the 15 detachments visited, six had a regular member in the exhibit custodian position while nine had a public service employee or other non-regular member in the role.

The audit determined that there is no formalized or standardized training available to employees working in the role of exhibit custodian other than that provided by the function of their PROS storekeeper role, and the firearms safety course. This gap is more acute for public service employees or non-regular members working in detachments as exhibit custodians.

The PROS training is focussed on using the property management functionality within PROS, and the firearms safety course provides basic knowledge to handle firearms safely. However, there is no training which elaborates on the roles and responsibilities of the custodian outside of the PROS environment.

Role specific training and guidance would assist to mitigate knowledge gaps for non-regular members working in the exhibit custodian role, and reinforce proper procedures. It would provide an opportunity to share best practices. It would also mitigate the risk of inconsistencies in how custodians exercise their responsibilities.

Exhibit custodians interviewed explained that training is typically limited to job shadowing the previous exhibit custodian. This type of training is inherently inconsistent given it relies on the level of knowledge of the previous custodian and the time period allocated for job shadowing can vary greatly.

Due to this inconsistency, non-regular member exhibit custodians may not have exposure during their training to the various types of exhibits they could expect to be exposed to, such as the many types of drugs and their handling requirements, DNA, the wide array of firearms, hazardous materials, digital devices, and other.

### **Training at the National Forensic Laboratory Services and the Advanced Digital Forensics Services**

In both of these specialized areas, the exhibit custodian and evidence management positions were found to be occupied by non-regular member employees.

The National Forensic Laboratory Services has a culture of scientific rigour, continuous improvement and learning. It has a highly structured and rigorous training program in place for its programs, including evidence management, and its employees undergo continuous proficiency testing. These are aligned with requirements to maintain accreditation.

In the case of the Advanced Digital Forensics Services, personnel receive highly specialized training at the Canadian Police College and supplemented by job shadowing. Advanced Digital Forensics Services interviewees reported that the training offered provides the necessary knowledge regarding the principles of search and seizure, as well as the importance of continuity in exhibit management, etc.

There were no specific training gaps noted for the National Forensic Laboratory Services and the Advanced Digital Forensics Services.



## Observation 6

Tools and resources: Variability in how detachments are equipped to process and store exhibits increases the risk of degradation for those without the necessary tools.

### **Personal protective equipment**

Ensuring employees have the necessary personal protective equipment to handle potentially hazardous exhibits is of prime importance to help mitigate risks to health and safety.

Of the 15 detachments and two specialized forensic support services visited, none raised concerns related to the availability of personal protective equipment to process and handle high-risk exhibits.

As further confirmation that risks to health and safety were not prevalent at the units visited, it was noted that there were no known reported Health and Safety incidents related to exhibit handling.

During on-site walkthroughs, the audit team noted the use of specialized signage, labels and storage being used for hazardous exhibits (like fentanyl). Interviews with supervisors indicated that addressing health and safety risks and ensuring employees have the necessary equipment is a top priority.

### **Other equipment**

A variety of factors such as the age of a facility, the nature of policing in the catchment area, and resourcing make it such that not all detachments have the same physical setup, equipment, and storage for exhibits.

While most detachments reported having most of the necessary tools and equipment to adequately manage exhibits, some deficiencies were observed.

For example, while all five detachments visited in O Division had specialized vent hoods for processing high-risk drug exhibits, the [REDACTED] visited lacked such equipment. Also noted were the absence of charging stations for electronic devices, drying cabinets, and a lack of storage space in two high volume detachments [REDACTED]. There was a noted gap in [REDACTED] related to the absence of a computer terminal dedicated to processing exhibits in the exhibit locker, rendering record-keeping related to the movement of exhibits inefficient. Three detachments' exhibit rooms [REDACTED] were situated below ground level, increasing risks related to flooding and possible sewer backup issues.

No equipment deficiencies were noted for the Advanced Digital Forensics Services and the National Forensic Laboratory Services, both of whom reported having the necessary equipment to carry out their work with exhibits.

### **Exhibit disposal**

OM chapter 22.3 governs exhibit disposal and contains guidance and requirements with respect to the disposition of various types of property/exhibits. The audit expected that practices would be aligned with the requirements of the OM and would ensure adequate internal controls are in place to maintain accountability and physical safekeeping of exhibits being disposed of.

The audit noted that all 15 detachments visited had suitable arrangements for the destruction of high-risk exhibits (for example: commercial incineration for drugs, destruction of firearms at detachment or municipality, etc.).

Additional internal controls to increase accountability were found to be in place surrounding exhibit disposal. For example, logs are kept of exhibits destroyed, two employees attend drug burns to witness the event, receipts are used when returning property to original owners, and banking receipts are retained when currency is deposited to the Receiver General.

Various practices were noted for recording destruction of exhibits in PROS. For example, once a court disposition order is received, some exhibit custodians record exhibit as disposed of in PROS prior to the actual physical destruction of the exhibit, while other custodians transfer the exhibit to another location (like a burn bin) within PROS in anticipation of the physical destruction. The latter example more accurately reflects reality.

The National Forensic Laboratory Services and the Advanced Digital Forensics Services do not typically destroy exhibits sent to them for analysis. The original exhibits are returned to originating units once the analysis is complete. Retention, storage and disposal requirements are for the submitting units to manage appropriately.

#### Conclusions related to training, tools, and resources

Training, tools and resources support the control framework by ensuring employees have the requisite knowledge and ability to carry out exhibit related responsibilities and processes as intended. Outside of the National Forensic Laboratory Services and the Advanced Digital Forensics Services, the lack of formalized training for public service employees and/or other non-regular members working as exhibit custodians may be impacting their level of knowledge, understanding and confidence in carrying out their roles and responsibilities.

This increases the risk of both non-compliance with policy for those detachments that use public service employees in the exhibit custodian role and inconsistency with exhibit handling procedures for the RCMP as a whole. There is also the missed opportunity for the sharing of best practices. Role specific training and guidance could assist in bridging these gaps.

Detachments without a full suite of equipment to process high-risk exhibits, or those with exhibit rooms situated in basements have to rely on mitigation plans to ensure risks are appropriately managed. [REDACTED] Active monitoring of existing exhibit storage occurs in the meantime.

Accurate record-keeping helps to maintain exhibit integrity. Recording exhibits as disposed of prior to their actual destruction does not align with procedures articulated for disposal in OM ch. 22.3.

#### Why these findings are important

Ensuring employees have the necessary knowledge and tools to perform their duties strengthens exhibit handling practices. Mismanaged exhibits can have a negative impact on court proceedings, create liability for seized personal property, increase health and safety risks to employees, and cause reputational harm to the RCMP.

#### Recommendations related to training, tools, and resources

A national training curriculum for exhibit custodians should be developed that is specific to or that includes non-regular members.

To ensure risks are appropriately mitigated, divisions should carry out an assessment of the risks and establish mitigation strategies for its detachments that do not have the required tools (for example: vent hood, electronic device charging stations, and storage) to manage exhibits.

Observation 7

While overall compliance is strong, the audit noted a few areas that require additional attention to further enhance exhibit controls related to the accuracy of records in PROS, and packaging and labelling.

**Detachments**

For detachments, the results of audit testing indicated that compliance to policy requirements was generally strong. Compliance rates were all in excess of 90% for each element assessed such as continuity being well documented, exhibit packaging and labelling, accurate data entry in PROS for exhibit description/location, and firearms being rendered inoperable for safe storage.

From the sample of files reviewed, a few areas were identified for improvement. For example, for drug-related exhibits, only 71% of files had evidence of the necessary Health Canada reporting clearly documented. In addition, 13% of exhibits reviewed did not have evidence of the required Report to Justice (Form 5.2) noted on the file.

Another area which was found lacking was inconsistent use of the “property” tab within PROS for documenting all exhibit related movements and accurate location of exhibits. For 10% of exhibits reviewed, additional details were required from “general” and “supplemental” reports in order to be able to review the chain of custody. This indicates that the “property” tab in PROS could not always be relied upon to provide a complete picture of the chain of custody for an exhibit, and accurate location of the exhibit.

It was noted that these issues are commonly observed in typical ULQA and management reviews, and also echo the findings reported in the 2013 Audit of Exhibit Control in Detachments.

**National Forensic Laboratory Services**

These services stood out as the unit with the most emphasis on compliance with its rigorous quality control program and the file testing results were reflective of this. A number of exhibit handling requirements were reviewed as part of the file testing carried out for the National Forensic Laboratory Services, including intake processes, documentation of continuity, and evidence of supervisory review. Results for exhibits sampled for these services indicated full compliance with requirements.

**Advanced Digital Forensics Services**

Like National Forensic Laboratory Services, audit testing was conducted on a sample of exhibits from Advanced Digital Forensics Services to assess compliance with requirements surrounding intake processes, documentation of continuity, and evidence of supervisory review. While compliance was generally strong, a few areas were identified as requiring improvement.

Exhibit files reviewed had inconsistent evidence of supervisory review. While the audit expected each exhibit analyzed by Advanced Digital Forensics Services would be reviewed by a supervisor, only 53% of exhibits reviewed had documented evidence of supervisory review. This was attributed to staff shortages. With respect to documenting continuity, Advanced Digital Forensics Services analysts documented exhibit work-related tasks on 1624 (Continuation Report) forms. Audit testing noted the opportunity to include greater detail on the 1624 form regarding the physical location of the exhibit when in the analyst’s possession in order ensure that there are no gaps in continuity and to minimize the risk that the whereabouts of the exhibit could not be clearly articulated.

**Physical security**

During site visits of detachments, a number of physical security requirements were assessed. These elements ranged from assessing the adequacy of exhibit room doors, locks, storage cabinets to more significant

infrastructure considerations such as the physical location of exhibit rooms, heating, ventilation, cooling, and plumbing.

While compliance to policy requirements was generally good, a number of factors such as the age of the building, space restrictions, and physical layout made compliance with some aspects difficult. For example, three detachments visited [REDACTED] had their exhibit storage located in the basement of the building, which renders exhibits at potentially greater risk of damage due to flooding, sewer backup. A few other detachments had their exhibit rooms located on exterior walls. While these situations do not align with the recommendations of the *Property Management Manual*, correcting the deficiencies is complex. The audit acknowledges that ensuring compliance with some elements involving the infrastructure of a building is a broader issue involving longer term planning and requires further assessment by management.

#### Conclusions related to compliance

Non-compliance with policies could impact prosecutions and public trust in the RCMP. Deficiencies in meeting physical security requirements can also reduce the extent to which exhibits are safeguarded and increase health and safety risks to employees.

#### Why these findings are important

Mismanaged exhibits can have a negative impact on court proceedings, create liability for seized personal property, increase health and safety risks to employees, and cause reputational harm to the RCMP. These areas for improvement are important because they are integral to ensuring that evidence is seized, processed, stored, moved, and disposed of in accordance with both legal and policy obligations.

#### Recommendations related to compliance

Ensuring additional monitoring of risk areas identified in file testing, particularly surrounding the accuracy of PROS records related to the location of exhibits.

Establish mitigation strategies for detachment exhibit storage that do not meet requirements of the *Property Management Manual*.

## Recommendations

Given the cross-cutting and multi-business line impacts of the recommendations below, Internal Audit encourages key stakeholders, with Contract and Indigenous Policing as the lead, to collaborate in their response to provide a pan-RCMP management action plan to best address the findings and related risks. The ultimate objective is to strengthen the governance, internal control and risk management frameworks in place to support the exhibit controls.

1. Policies should be updated to accurately reflect current procedures and expectations, including the issuance of additional guidance regarding long-term retention of exhibits and storage of specialized DNA exhibits.
2. That a national training curriculum for exhibit custodians be developed.
3. Oversight of exhibits should be enhanced by:
  - a) ensuring additional monitoring of risk areas identified in file testing, including the accuracy of PROS records related to the location of exhibits
  - b) clarifying the current policy requirement for a mandatory yearly ULQA for exhibit control

	<ul style="list-style-type: none"><li>c) increasing monitoring of the granting/removal of the storekeeper role in PROS</li><li>d) leveraging the national ULQA data related to exhibits, given the organizational plans to decommission and replace the Annual Performance Plan System</li></ul>
4.	<p>That divisions carry out an assessment of the risks and establish mitigation strategies for its detachments that:</p> <ul style="list-style-type: none"><li>a) do not have the required tools (such as vent hood, electronic device charging stations, and storage) to manage exhibits</li><li>b) do not have BCPs that include provisions for exhibits</li><li>c) do not meet the requirements of the <i>Property Management Manual (Fit Up Standards)</i> for exhibits storage</li></ul>

## Appendix A – Audit objective and criteria

### **Audit objective**

To assess the adequacy of the processes and practices used within the RCMP to control exhibits and to determine the level of compliance with relevant policies. The audit will also assess the implementation of the recommendations from the 2013 Audit of Exhibit Controls in Detachments to determine if issues raised in the audit have been addressed.

### **Criterion 1**

A governance structure, inclusive of a policy framework and related oversight mechanisms, for exhibit management is in place.

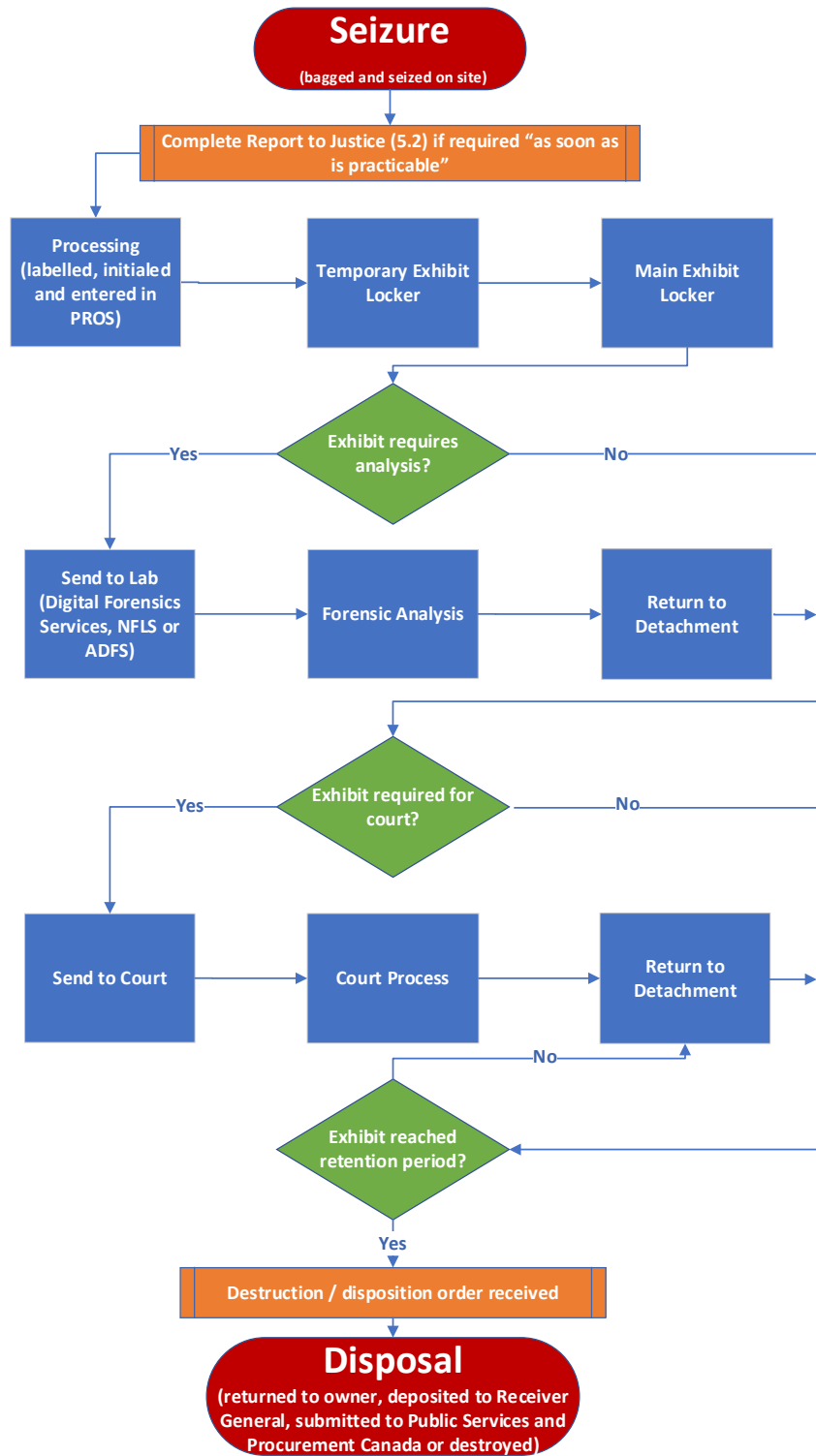
### **Criterion 2**

Employees are aware of their accountabilities, and are equipped with training, tools, and resources to fulfill their responsibilities.

### **Criterion 3**

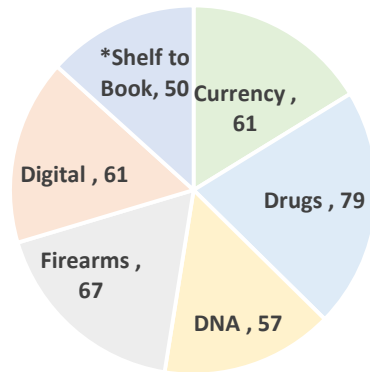
Exhibit handling is conducted in compliance with relevant policies.

Appendix B – Exhibit lifecycle

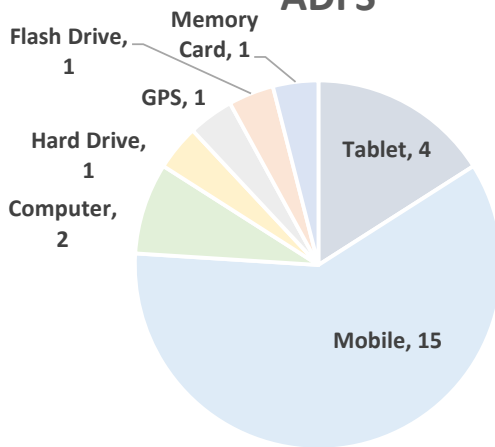


Appendix C – Exhibit sample breakdown

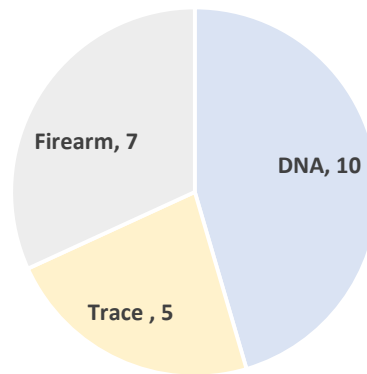
### Detachments



### ADFS



### NFLS



Note:

Shelf to Book in the diagram called Detachments is the process of sampling an exhibit from the main locker and verifying in PROS for its description, labelling, location and continuity.



## Appendix D – Management action plan

Given the cross-cutting and multi-business line impacts of the recommendations below, Internal Audit encourages key stakeholders, with Contract and Indigenous Policing as the lead, to collaborate in their response to provide a pan-RCMP management action plan to best address the findings and related risks. The ultimate objective is to strengthen the governance, internal control and risk management frameworks in place to support the exhibit controls.

Recommendations	Response	Position responsible	Planned action	Completion date
<p>1. Policies should be updated to accurately reflect current procedures and expectations, including the issuance of additional guidance regarding long-term retention of exhibits and storage of specialized DNA exhibits.</p>	<p>Agreed</p>	<p>Officer in charge, Operational Policy and Compliance</p>	<p>1. <b><u>Contract and Indigenous Policing (C&amp;IP)</u></b> C&amp;IP will complete a fulsome review of the National Operational Policy OM Part 22.3 Disposal for update and publication.</p>	<p>Phase 1 and 2: Research, review, analysis and policy drafting to be completed by January 2024.</p> <p>Phase 3 and 4: Complete two rounds of extensive national consultation, including Criminal Operations Officers, and other stakeholders as appropriate, inclusive of feedback, analysis and policy draft amendments. Depending on the complexity and breadth of consultation this may be completed by June 2024.</p> <p>Phase 5, 6 and 7: Policy and Publications Section to complete final edits, review and ensure Federal standards requirements. Publication to the RCMP platform and further</p>

				<p>communication to employees. This time line may vary depending on the Policy and Publications Section’s existing policy pressures and timelines. Phases 5 and 6 are outside the control of C&amp;IP.</p>
		DG, National Forensic Laboratory Services	<p><b>2. <u>Specialized Policing Services</u></b> Forensic Science and Identification Services (FS&amp;IS) currently provides a form letter with every returned exhibit which outlines how items should be stored locally upon receipt. FS&amp;IS will review and modify the letter as necessary to ensure there is sufficient clarity for investigators/exhibit custodians as to what is required. In addition, the Investigator’s Guide will be updated to include storage information.</p>	<p>March 2024</p>
		Officer in charge, Federal Policing Operational Policy	<p><b>3. <u>Federal Policing</u></b> Federal Policing Operational Policy is in the process of updating <i>Operational Manual (OM) Part 6 – Drugs (OM 6.7, 6.8, 6.9, and 6.11)</i> and OM ch. 49.10 – Cryptocurrency which will also address this recommendation by clarifying some of the roles and responsibilities related to these specialized exhibits.</p> <p>Federal Policing Operational Policy will communicate with the Policy and Publications Section in order to have the contact information updated in the top part of the policy, and that will direct questions on exhibits to the policy</p>	<p>OM 6.7 Highly Toxic Substances – July 2024 OM 6.8 Search and Seizure of Drugs – October 2024 OM 6.9 Drug Exhibits – October 2024 OM 6.11 Stockpiling Drugs – January 2025 OM 49.10 Cryptocurrency – June 2024</p>

			center in the interim while the chapter is being updated.	
<p>2. That a national training curriculum for exhibit custodians be developed.</p>	Agreed	<p>Officer in charge, Operational Policy and Compliance</p> <p>Officer in charge, Operational Policy and Compliance</p>	<p>Contract and Indigenous Policing to create a management action plan working group specific to the exhibit custodian role, with all business line stakeholders engaged as active participants. The purpose of the working group is to identify any potential gaps in training and direction relating to the exhibit custodian role.</p> <p>The group will review current policy/guides/directives relating to the exhibit custodian role.</p> <p>Based on the results of the working group's review, a curriculum taking the form of a supplementary resource such as a guide amendment, brochure or training aid will be created as deemed appropriate.</p>	<p>Create working group by December 2023</p> <p>Working Group to report to Steering Committee on findings and recommended deliverables by June 2024</p>
<p>3. Oversight of exhibits should be enhanced by:</p> <p>a. ensuring additional monitoring of risk areas identified in file testing, including the accuracy of PROS records related to the location of exhibits</p> <p>b. clarifying the current policy requirement for a mandatory yearly ULQA for exhibit control</p> <p>c. increasing monitoring of the granting/removal of Storekeeper Role in PROS</p> <p>d. leveraging the national ULQA data related to exhibits, given the organizational plans to decommission and replace the Annual</p>	Agreed	<p>Operational Records Management System Client Service Manager, Operational Policy and Compliance</p> <p>Officer in charge, Operational Policy and Compliance</p>	<p><b><u>Contract and Indigenous Policing</u></b></p> <p>a) Operations Systems Service Centre to review current PROS guide to assist with further monitoring and to determine if there is a need for more guidance, compliance measures or clarifying language in the PROS Storekeeper Property Management Guide.</p> <p>b) Operational Policy and Compliance will review OM 22.3 Disposal, and consult stakeholders to develop specific language relating to the compliance function of ULQAs for exhibits. Same phased timeline as in Recommendation #1.</p>	<p>February 2024</p> <p>The proposed time lines submitted for the amendment of OM 22.3 Disposal policy would be:</p> <p>Phase 1 and 2: Research, review, analysis and policy drafting to be completed by January 2024.</p> <p>Phase 3 and 4: Complete two rounds of extensive national consultation including criminal operations</p>

<p>Performance Plan System</p>		<p>Operational Records Management System Client Service Manager, Operational Policy and Compliance</p> <p>Strategic Partnerships and External Relations</p>	<p>c) Operations Systems Service Centre will audit the storekeeper role-based access control in consultation with the divisions to ensure Storekeeper access in PROS is granted and removed in a timely manner and is a functional requirement for the user.</p> <p><b><u>Strategic Partnerships and External Relations</u></b></p> <p>a) As the Annual Performance Plan System is scheduled for</p>	<p>officers, and other stakeholders as appropriate, inclusive of feedback, analysis and policy draft amendments. Depending on the complexity and breadth of consultation this may be completed by June 2024.</p> <p>Phase 5, 6 and 7: Policy and Publications Section to complete final edits, review and ensure Federal standards requirements. Publication to the RCMP platform and further communication to employees. This time line may vary depending on the Policy and Publications Section's existing policy pressures and timelines. Phases 5 and 6 are outside the control of C&amp;IP.</p> <p>December 2023</p> <p>To be confirmed by Strategic Partnerships and External Relations</p>
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		<p>Officer in charge, Federal Policing Operational Policy</p> <p>Officer in charge, Advanced Digital Forensics Services/Audio and Video Analysis Unit</p>	<p>decommission and replacement, Strategic Partnerships and External Relations is to lead the initiative for an alternate remedy to data collection which should encompass a data storage, analysis and feedback mechanism.</p> <p>This would allow for divisional insights and ULQA results to be shared with the various policy centers to build best practices and enhance compliance.</p> <p><b><u>Federal Policing</u></b>  a) Federal Policing Operational Policy will update policies OM 6. 7 Highly Toxic Substances, 6. 8 Search and Seizure of Drugs, 6. 9 Drug Exhibits, 6. 11 Stockpiling Drugs and 49.10 Cryptocurrency which will provide better guidance for supervisors and managers in monitoring the handling and movement of specialized exhibits.</p> <p><b><u>Specialized Policing Services</u></b>  Advanced Digital Forensic Services have addressed issues related to supervisory review of evidence by adding a staff sergeant, Operations, position to the program. This non-commissioned officer position will be responsible for conducting a monthly supervisory review of exhibits, exhibit room, and exhibit logs.</p> <p>Advanced Digital Forensic Services will include more information on the physical location of exhibits to ensure there are no gaps in continuity, and to minimize risks related to whereabouts of exhibits. The Operations non-commissioned officer will meet with the exhibit custodian to train them on</p>	<p>OM 6.7 Highly Toxic Substances – July 2024  OM 6.8 Search and Seizure of Drugs – October 2024  OM 6.9 Drug Exhibits – October 2024  OM 6.11 Stockpiling Drugs – January 2025  OM 49.10 Cryptocurrency – June 2024</p> <p>November 2023</p>
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			additional details required in the 1624 form, specifically relating to exhibit movement, allowing for more detail to describe the continuity of the evidence.	
<p>4. That divisions carry out an assessment of the risks and establish mitigation strategies for its detachments that:</p> <p>a. do not have the required tools (for example: vent hood, electronic device charging stations, and storage) to manage exhibits</p> <p>b. do not have business continuity plans that include provisions for exhibits</p> <p>c. do not meet the requirements of the <i>Property Management Manual (Fit Up Standards)</i> for exhibits storage</p>	Agreed	<p>A/Commr., Contract and Indigenous Policing supported by DG, Operational Readiness and Response and DG, National Criminal Operations</p> <p>Officer in charge, Federal Policing Operational Policy</p>	<p><b><u>Contract and Indigenous Policing</u></b> a.-c.) Contract and Indigenous Policing is to disseminate a message to all Criminal Operations Officers reinforcing the need for proper equipment/tools to handle, manage, and safely store exhibits. The message will equally reinforce the need to prioritize appropriate Business Continuity Plans for exhibits.</p> <p><b><u>Federal Policing</u></b> a) Federal Policing Operational Policy is in the process of updating the OM 6.7 - Highly Toxic Substances policy which will address the situational risk assessment and the use of personal protection equipment.</p> <p>Federal Policing Criminal Operations – Serious and Organized Crime will communicate with the divisions to ensure that all detachments have access to the necessary equipment to treat these highly toxic exhibits.</p>	<p>December 2023</p> <p>OM 6.7 Highly Toxic Substances – July 2024</p>