

Law Enforcement Complaints Agency

2026 – 2029 Business Plan

Contents

Section 1: Mandate	1
Section 2: LECA 2026-2029 Staffing.....	3
• Executive Office	3
• Case Management	3
• Investigations.....	3
• Legal Services	4
• Corporate Services	4
• LECA 2026/29 Organizational Chart	6
Section 3: Three-year Financial Plan	7
• Multi-Year Operating Budget	7
Section 4: Strategic Priorities	8
• Build confidence in the complaints system by achieving excellence in police oversight	8
• Influence change in police policies and practices.....	9
• Professional, committed and engaged employees.....	9
Section 5: Performance Measures and Targets	10
• Police Service Performance Measures	10
Seven-day local response	11
45-day early resolution	11
120-day conduct complaint investigation - referred	11
• LECA Performance Measures.....	11
Two-day intake	12
15-day audit	12
30-day case management analysis	12
30-day notification screening.....	12
60-day request for review.....	13
120-day conduct complaint investigation - retained.....	13
12-month complaint processing.....	13
Section 6: Risk Identification, Assessment, and Mitigation Strategies.....	14
Section 7: Artificial Intelligence (AI) Use Cases	18

Section 1: Mandate

Pursuant to the Police Services Act (PSA), the Office of the Independent Police Review Director (now called the Law Enforcement Complaints Agency) began operations in 2009 and accepted public complaints about the conduct of sworn police officers.

LECA managed more than 6,000 complaints in 2024–25, a reflection of the agency's ongoing commitment to accountability and service. Over the past ten years, the agency's caseload has more than doubled—growing by up to 17% annually—while operating with the same level of resources. This sustained growth presents operational challenges, but the agency remains focused on delivering effective oversight and adapting to meet the needs of the public.

The Community Safety and Policing Act (CSPA), proclaimed on April 1, 2024, expanded LECA's jurisdiction so that it not only investigates allegations of police misconduct submitted by members of the public but from nine other outside sources: the Solicitor General of Ontario, the Special Investigations Unit, the Office of the Inspector General, police service boards, the Ontario Provincial Police Commissioner, Chiefs of municipal police services, Chief of the Niagara Parks Police Service, the Legislative Protective Service, the Chief of the Nishnawbe Aski Police Service and Chiefs of First Nations Police Services, that opt into the CSPA. Additionally, LECA's Director can now self-initiate a conduct investigation.

Since April 1, 2024, the agency has received 577 notifications, a volume that will increase as stakeholders adapt to the new mandatory notifications process. These nine new sources of police conduct investigations have significant operational impacts for LECA because unlike allegations of police misconduct submitted by members of the public, allegations of police misconduct from these nine sources, and self-initiated investigations, must be retained by LECA for investigation if the Director determines they are in the [public interest](#). Public interest investigations raise complex or distinct considerations. The CSPA also requires the timely completion of investigations within 120 days. With an expected increase in notifications, LECA is committed to continuously reviewing and improving its processes to ensure each investigation is completed in an effective and timely manner.

Our Purpose and Goals

LECA's **vision** is to strengthen public trust in policing by delivering independent, timely, and fair investigations, resolving complaints effectively, and addressing systemic

issues¹ to improve accountability across Ontario. Our **mission** is to conduct and oversee timely, thorough, and impartial investigations into police misconduct; to proactively address emerging issues in policing; and to strengthen public confidence in police oversight across Ontario.

We do this through:

1. Receiving, and screening allegations of police misconduct from multiple sources across Ontario.
2. Investigating allegations of police misconduct.
3. Proactively resolving evolving issues in policing through early resolution, issuing notices of inquiry, and conducting systemic reviews of policing.

In fulfilling our commitments, we are guided by the following principles:

- **Accountability and Transparency** — We improve the transparency and accountability of police oversight.
- **Integrity** — Our staff act with integrity providing professional, objective, timely services.
- **Independence** — We conduct fair, transparent, and effective investigations.

The agency's mandate aligns with the Ontario government's priority of promoting fairness and providing access to justice. Further, it aligns with the ministry's vision of an innovative, sustainable, and responsive justice system that promotes public confidence and upholds the rule of law.

Ethical Statement on Financial Reporting

LECA is committed to assuming full accountability for maintaining compliance with OPS established significant financial accounting policies and Public Sector Accounting principles.

Our financial reporting and results are based upon the highest degree of integrity and objectivity. It is our commitment to provide financial information that is transparent, timely, complete, relevant, and accurate.

¹ Pursuant to s. 133 of the Act, the Complaints Director may, at his own discretion, initiate a systemic review. Under s. 132 of the Act and LECA Rules of Procedure, the Complaints Director may issue a Notice of Inquiry or Examination to a designated authority or police service.

LECA's management team is responsible for the fair representation of LECA's financial statements and has full responsibility for their integrity and accuracy.

LECA is committed to maintaining rigor and diligence with respect to the agency's oversight responsibilities and are confident that the agency's financial and business processes provide accurate information on a timely basis.

Section 2: LECA 2026-2029 Staffing

The agency has an allocation of 52 full-time equivalent (FTE) staff members organized into the following operational units:

- **Executive Office**
 - Provides direction and makes decisions in accordance with the LECA mandate
 - Acts as the public face of LECA.
 - Provides strategic and operational direction for the agency.
- **Case Management**
 - Provides front-counter and electronic access to filing of complaints.
 - Provides public liaison and complaints assistance in English and French.
 - Undertakes intake and screening of complaints.
 - Provides final screening decisions, with reasons, for complaints that are screened out.
 - Leads the agency in providing accommodations under the *Access for Ontarians with Disabilities Act* (ADOA) and Human Rights Code.
 - Creates and maintains records and case management reporting processes.
- **Investigations**
 - Finalizes public police complaint screening process for complaints that are screened in to be investigated.
 - Refers appropriately deemed complaints to be investigated by either the originating or a third-party police service, and reviews informal resolutions.
 - Drafts investigative plans, oversees investigations to completion and audits investigative reports for all complaints referred to police services.

- Authorizes Time Extension Requests on referred investigations, and reviews withdrawals and informal resolutions.
- Provides recommendations to the Complaints Director regarding the public interest of a complaint and the retention of complaints for investigation.
- Undertakes independent investigations of retained police conduct complaints.
- Manages, in collaboration with the Legal unit, the Request for Review (R4R) process.
- Provides education about the public complaints process to the Ontario Provincial Police (OPP), Police Service Boards, as well as municipal and regional police services across Ontario.

- **Legal Services**

- Provides integrated legal advice and associated services to the Complaints Director and other LECA staff.
- Provides legal support to investigators concerning criminal and administrative law, legal rights, scope of power and statutory interpretation of legislation/regulations.
- Appears on behalf of LECA at the Ontario Police Arbitration and Adjudication Commission, Superior Court of Justice, Divisional Court, and other proceedings.
- Assists with legal/policy work and liaises with MAG and other ministries.
- Screens notifications received by the agency.
- Monitors substantiated cases through disciplinary hearings.
- Manages, in collaboration with the Investigations unit, the Request for Review (R4R) process.

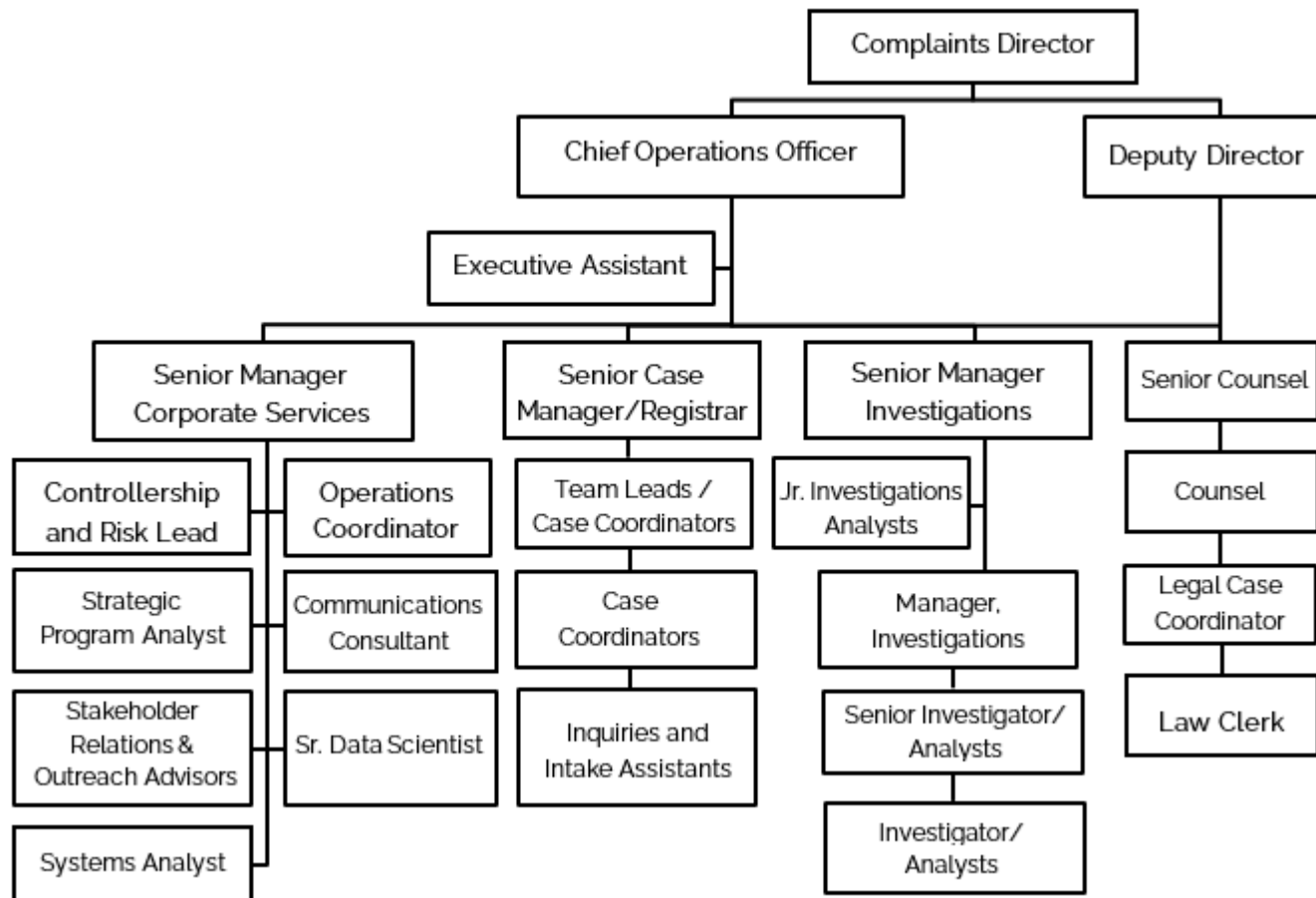
- **Corporate Services**

- Provides financial, human resources, information technology, communications and outreach, controllership, procurement, risk management, knowledge management, records management and retention, strategic planning, data management, asset management, facilities, training, and administrative functions for the agency.
- Develops policies and procedures, performance measures and

engagement strategies.

- Manages freedom of information requests.
- Raises public and media awareness of the agency through a variety of channels, including evolving web and social media content, media relations, announcements, events, and presentations to a broad range of community organizations.
- Provides timely responses to media enquiries about complaints and investigations.
- Manages early resolution processes and outreach for the agency.
- Liaises with complainants who have accepted the Early Resolution process or agreement to mediation.

LECA 2026/29 Organizational Chart



Section 3: Three-year Financial Plan

Multi-Year Operating Budget			
Expense Category	2026-27 Budget	2027-28 Budget	2028-29 Budget
Salary, Wages and Benefits			
Salaries and Wages	6.3237	6.3237	6.3237
Benefits	0.6707	0.6707	0.6707
TOTAL Salary, Wages and Benefits	6.9944	6.9944	6.9944
ODOE			
Transportation and Communications	0.1953	0.1953	0.1953
Services	0.7381	0.7381	0.7381
Supplies and Equipment	0.0500	0.0500	0.0500
TOTAL Operating	7.9778	7.9778	7.9778
FTE Allocation	52	52	52

Section 4: Strategic Priorities

Build confidence in the complaints system by achieving excellence in police oversight

Increasing the public's confidence in the public complaints system and enhancing confidence in policing is dependent on the transparency between the agency, police services and the public. This is accomplished through:

- Providing timely and effective investigations into allegations of police misconduct received from multiple sources across Ontario, which include public complaints and notifications.
- Remaining proactive through monitoring and addressing issues through alternative dispute resolution, issuing Notices of Inquiry, and conducting systemic reviews of policing.
- Maintaining an accessible and effective dispute resolution process through use of the early resolution processes.
- Enhancing accountability of police services.
- Ensuring proper oversight of investigations conducted by police services, including timely and high-quality review processes.
- Maintaining professional standards, quality and timeliness for investigations retained by the agency.
- Improving the police service investigations through timely and high-quality review processes.
- Implementing appropriate agency-wide training on a regular basis.
- Exploring transformative information technology and business processes to support case management and investigations.
- Continuous outreach and engagement, actively listening and learning from all stakeholders to improve services and practices.
- Focusing on building trust with all stakeholders through engagements, outreach and education.
- Continuously building cultural competencies through engaging, education and training of all LECA staff to further complement outreach work and to adapt services.
- Analyzing and reporting on data collected under the *Anti-Racism Act*, 2017. Data is collected for the purpose of identifying racial inequalities in

agency processes, inform the development of new policies and procedures and ensure the complaints process outcomes are bias-free.

- Implementing robust risk management practices to enhance transparency, fairness and accountability.

Influence change in police policies and practices

The agency aims to not only build confidence in the complaints system, but also to use data assessed from sources across Ontario, to proactively identify trends and make recommendations. The ways in which the agency influences this change include:

- Utilizing the agency's notifications system to identify emerging issues and influence positive change.
- Leading and promoting best practices in investigating allegations of police misconduct.
- Improving policing practices through robust oversight of police investigations.
- Initiating notices of inquiries and examinations or systemic reviews.
- Participating in and providing input to inform legislation related to police oversight.
- Enhancing the Early Resolution and Informal Resolution processes to provide meaningful complaint resolution without going to investigation.

Professional, committed and engaged employees

The agency firmly believes that an organization is only as strong as its people; accordingly, having a professional, committed and engaged workforce is a key priority. This priority is realized through:

- Building a flexible and responsive workforce that rapidly adjusts to changing business environments.
- Creating a knowledge management framework to support the implementation of an ongoing comprehensive training program to enhance staff skills.
- Maintaining a human capital plan that includes strategies for succession planning and future operational needs.

- Implementing an employee engagement strategic plan to increase employee engagement while fostering an inclusive work environment that respects and embraces diversity.
- Develop employee pathways that promote professional growth and engagement.

Section 5: Performance Measures and Targets

The agency tracks performance measures (PM) for both, LECA and police services for activities and their outcomes related to the public complaints process. The outcome-based performance measures and targets outlined below will be used over the next three years to support LECA's objective of delivering independent, timely, and impartial oversight, promoting consistent, high-quality decision-making and strengthening public confidence in police oversight across Ontario.

Over this period, these measures will be used to evaluate progress toward achieving the agency's mission and vision. Collectively, they demonstrate how effectively complaints are received, assessed, investigated, reviewed, and resolved, and how LECA and police services fulfill shared responsibilities within a public complaint framework in a manner that is transparent, fair and accountable.

The agency has the capacity to “drill down” in the data to review the individual progress of police services and areas of the agency.

As the agency continues to implement the mandate changes related to the CSPA, these performance measures may change to better reflect the agency's new mandate.

Police Service Performance Measures

Performance Measure	2026-27 Target	2027-28 Target	2028-29 Target
Seven-day local response	75%	75%	75%
45-day early resolution	90%	90%	90%
120-day conduct complaint investigation - referred	65%	65%	65%

Outcome: Timely and accountable police service responses that promote fair resolution and public confidence in the complaints process.

Seven-day local response

This measure reflects the percentage of "Local Response Summary Forms" received by the agency within seven-days after completion of a Local Response by Police services. The form must be signed, dated, and include a description of the response. The agency's case management system tracks this process electronically.

45-day early resolution

This measure tracks the percentage of early resolution cases completed within 45-business days. The early resolution process is intended to provide a timely resolution to complainants and should be completed in 45-business days. This PM is measured from the date the parties agree to early resolution to the date that the early resolution process is completed or ended. This PM captures early resolution files whose 45-business day deadline falls within the fiscal year.

120-day conduct complaint investigation - referred

This measure assesses the percentage of referred investigations concluded within 120-days. Investigators endeavour to ensure that conduct investigations are concluded within 120-days of commencement. To ensure compliance with the 120-day investigation report completion, the agency's case management system tracks investigation report due dates.

This PM is measured from the date a complaint file was referred to the police service until the date the chief makes their decision. The PM includes files where the deadline date falls within the fiscal year.

LECA Performance Measures

Performance Measure	2026-27 Target	2027-28 Target	2028-29 Target
Two-day intake	90%	90%	90%
15-day audit	75%	75%	75%
30-day case management analysis	80%	80%	80%
30-day notification screening	60%	70%	80%
60-day request for review	60%	60%	60%

120-day conduct investigation - retained	50%	50%	50%
12-month end to end complaint processing	90%	90%	90%

Outcome: Independent, timely, high-quality oversight that ensures fairness, transparency, and confidence in the public complaints system.

Two-day intake

This measure reflects the percentage of new complaints where intake is completed within two (2) business days. This is measured from the time that an official complaint form is received to the date the intake process is completed.

15-day audit

This measure tracks the percentage of investigation report audits completed by within 15 business days of receipt, where the audit meets quality standards. Upon the completion of a referred investigation, police services send a copy of the investigation report to the agency for review. LECA investigators endeavour to complete an audit of these reports within 15 business days of receipt of the report. This PM includes all files where the 15-day deadline date falls within the fiscal year.

30-day case management analysis

This measure assesses the percentage of full complaint reviewed completed within 30 business days of receipt. Once a complaint file is received by the agency, the case coordinators endeavour to complete a full review of the complaint within 30 business days. If a complaint is missing information which requires staff to contact the complainant, the period the agency is waiting for this information is excluded from the 30-day screening period. This PM includes files where the 30-day screening deadline falls within the fiscal year.

30-day notification screening

This measure tracks the percentage of notifications reviewed, and decision issued within 30 business days of receipt. Under the CSPA, LECA receives notifications of misconduct from the Special Investigations Unit (SIU), Inspectorate of Policing (IOP), Chiefs of Police, and Police Service Boards. LECA then reviews the notification to determine if an investigation will be conducted based on the notification. When a notification is received by the agency, the legal unit endeavours to complete a full

review within 30 business days.

This PM measures from the date the notification is received to the date a decision has been sent out. This PM includes files where the 30-day screening deadline falls within the fiscal year.

60-day request for review

This measure reflects the percentage of Chief decision reviews completed within 60 calendar days of receiving all required disclosure and submissions.

Complainants have a right to request a review of Chief of Police decisions related to conduct complaints investigated by police services. When the agency receives a Request for Review, the agency contacts the relevant police service for disclosure related to the file. The parties are also permitted to provide submissions for the review. The agency endeavours to complete the review within 60 calendar days of receiving all of the required materials. This PM includes files where the 60-day deadline date falls within the fiscal year.

120-day conduct complaint investigation - retained

This measure assesses the percentage of retained conduct complaint investigations completed within 120 calendar days of retention. Investigators endeavour to ensure that conduct complaint investigations are concluded within 120 calendar days. To ensure compliance with the 120-day investigation report, the case management system tracks investigation report due dates. Occurrences of non-compliance are escalated to the Complaints Director.

Complaints retained by the agency are often more complex. As a result, investigations take longer to complete because investigators must receive disclosure from the police service.

This PM is measured from the date a complaint file was retained by the agency until the date the Director issues a decision. The PM includes files whose 120-day deadline date falls within the fiscal year.

12-month complaint processing

This measure tracks the percentage of complaints fully processed and closed within 12 months of receipt. The agency endeavours to fully process all complaints within

12 months of the date they are received. This includes all processes that a complaint file may enter during its lifecycle with LECA (Screening, Investigation, Request for Review, Early Resolution). This is measured from the date the complaint is received to the date that a final decision is rendered, and the file is closed by LECA. The measure includes any file where the 12-month deadline falls within the fiscal year.

Section 6: Risk Identification, Assessment, and Mitigation Strategies

Risk identification, assessment, and mitigation strategies are critical components of effective risk management. LECA has identified risks that could negatively impact the agency's objectives. These risks are assessed to determine their likelihood and potential impact. Mitigation strategies are developed and implemented to reduce or eliminate the identified risks, ensuring that the agency can achieve its goals with minimal disruption.

Quality and Effective Services

Risk:

The agency's mandate has expanded with the proclamation of the CSPA. Specifically, the ability to initiate an investigation, receive notifications and review complaints about First Nations Police Services, such as, Nishnawbe Aski Police Service (NAPS) has expanded LECA's mandate significantly. NAPS operates across thirty-four First Nations spanning two-thirds of Ontario. Since LECA can initiate an investigation without a complaint, media reports, correspondence and incomplete complaints or certain categories of complaints that were previously screened out (third party complaints, anonymous complaints, no jurisdiction, etc.) now need to be reviewed by staff. This change has increased caseload pressures. Further, additional First Nations Police Services may continue to opt-in to the CSPA, which will further expand LECA's scope of work.

LECA is also required to review notifications of potential misconduct from the Solicitor General, police services boards, the Special Investigations Unit (SIU), the Inspector General of Policing (IG), Chiefs of Police (Chiefs) and the Ontario Provincial Police Commissioner (Commissioner) as well as receive complaints about First Nations Police Services who have opted into the CSPA. This has resulted in an increase in caseload and in the complexity of investigations.

As the volume of public complaints increases to 17% per year, subsequent processes, including Requests for Reviews and Judicial Reviews will increase. Since April 1, 2024, the agency has received 328 Request for Reviews and 15 Judicial Reviews.

With the expansion of the mandate, LECA is now under the jurisdiction of the Ombudsman of Ontario and is thereby subject to greater reporting requirements. This requires more existing capacity to be dedicated to preparing detailed responses to requests, often under strict timelines.

The provincial government's hiring freeze introduced on September 27, 2025, will impact the agency's ability to replace staff leaving the agency or hire new staff.

Assessment:

The expanded mandate, combined with the hiring freeze, increases the risk of the agency's ability to deliver timely, high-quality and effective services to the public. These pressures could lead to backlogs, delays, and reduced quality of service.

Mitigation Strategy:

Despite a 127% increase in caseload since 2015, a significantly increased jurisdiction with the proclamation of the CSPA on April 1, 2024, and NAPS opting into the CSPA on December 10, 2024, the agency continues to mitigate risks of delayed and reduced quality services by continuously improving processes and efficiently allocating existing resources. These mitigation strategies include implementing a range of tools and initiatives to proactively manage an increase in caseloads such as mechanisms and tools in the case management system (CMS). The agency continues to adapt to increasing workloads across the units.

Increased caseload

Risk:

The agency has been managing year-over-year increasing caseloads with its existing workforce model. The expanded mandate under the CSPA has resulted in an increase in the number and complexity of complaints that the agency receives and manages through various sources. The increasing numbers of complaints compounds increasing requests for reviews, freedom of information requests and judicial reviews.

Increasing caseloads combined with insufficient resources significantly heightens legal risks for LECA. Pressures resulting from volume and limited time can impact the ability

to thoroughly review complaints, ensure compliance within legal frameworks, and maintain accurate documentation. This can lead to missed deadlines, procedural errors, and inconsistent application of laws or policies. All this exposes LECA to potential litigation, adverse judicial findings, penalties (such as cost awards, adverse IPC decisions and Ombudsman's findings), as well as reputational damage. Such outcomes or findings may signal deficiencies in decision-making processes or procedural fairness and undermine LECA's credibility and public trust. It can also lead to mandatory policy changes, increased oversight, and heightened scrutiny from stakeholders. These circumstances require substantial resources to implement corrective measures and manage reputational damage.

Assessment:

The increasing caseload places additional demands on the agency's operations and requires the introduction of new processes and workflows to manage expanded responsibilities. At the same time, the absence of additional staffing capacity further limits the agency's ability to absorb this growth. Together, these pressures increase the risk of longer processing times and delays for complainants and a general decline in overall service quality.

The agency has analyzed both current and historical complaint rates, along with existing police service sizes, excluding NAPS because it is new to the agency, to project the increase in caseload resulting from the expanded mandate.

For example, as of April 1, 2024, the OPP Commissioner, municipal Chiefs of police, Chief of NAPS, the SIU, and the Office of the Inspectorate of Policing, are required to notify the agency every time they become aware of any potential police misconduct. To assess the impact of the new sources of work to existing caseloads, the agency has adopted a screening rate for notifications comparable to that of public complaints to expedite these cases.

The establishment of the Inspectorate of Policing (IOP) has led to confusion as to which oversight body members of the public should file their complaint, which results in time lost, additional work for staff, and frustrated public complainants. LECA and the IOP are working collaboratively to mitigate these issues.

Mitigation Strategy:

Proactive resource planning and risk management strategies are essential to mitigate vulnerabilities. The agency has implemented a range of tools and initiatives to proactively manage increasing caseloads and prevent delays. This includes tracking

mechanisms to identify files at risk of missing service timelines and an auto-assignment tool designed to detect duplicate complaints, thereby reducing staff search time. To enhance efficiency and manage the number of complaints, re-directs and notifications from various services and entities, the agency continues to streamline documentation of our processes. Notification guidelines were developed to avoid duplication and to enhance consistency. In addition, the notification portal was developed to streamline the process of receiving notifications by having stakeholders answer a series of questions as part of their submission. The agency will monitor the incoming caseload to determine if the frequency of incoming files or the quantity and duration of notifications surpasses anticipated levels.

As redirected complaints from the IOP require extra time for staff to complete internal processes, the agency implemented measures to reduce review times and improved case management system efficiency by 50%.

The agency tracks the number of investigations retained as well as the number of new cases/investigations resulting from the expanded mandate under the CSPA and will track the number of prosecutions and their average costs as they occur.

The agency has engaged the Cabinet Office's Lean, Strategy, and Innovation Division (LSID) LEAN and the Behavioural Insights Unit (BIU) teams to review internal processes and data at the screening stage to identify further efficiencies as well as the public-facing complaint form and submission process. The combined efforts of the Lean and BIU teams provided recommendations to streamline and improve the effectiveness of the targeted processes. The agency is reviewing the recommendations brought forward, implementing changes to the complaint form, and working on further enhancing internal policies and protocols.

The combined efforts of the Lean and BIU teams provided recommendations to streamline and improve the effectiveness of the targeted processes. The agency reviewed the recommendations and started implementation.

The agency has been maximizing its current resources by reallocating staff to meet the needs of various units.

LECA continues to monitor these impacts and collaborates with the ministry on staff resource requests.

Section 7: Artificial Intelligence (AI) Use Cases

The agency has not used AI functionality as part of the development or delivery of, or decision-making for its program or service and therefore does not have any use cases at this time. The agency is currently exploring opportunities to utilize AI to promote greater efficiency and improved timeliness of the complaints process.