

# ANNUAL REPORT

APRIL 1, 2024 - MARCH 31, 2025

Law Enforcement  
Complaints Agency

# Contents

<u>Complaints Director's Message</u> .....	3
<u>Vision, Mission, Values</u> .....	4
<u>Organizational Structure</u> .....	6
<u>Organizational Chart</u> .....	8
<u>Financial Expenditures</u> .....	9
<u>New Legislation: Community Safety and Policing Act</u> .....	11
<u>Accomplishments and Key Priorities</u> .....	12
<u>Making a Complaint</u> .....	18
<u>Complaints Workload</u> .....	20
<u>Alternative Dispute Resolution</u> .....	22
<u>Screening Decisions</u> .....	23
<u>Notifications and Self Initiation</u> .....	25
<u>Redirection of Service and Policy Complaints to the Inspectorate of Policing</u> .....	28
<u>Conduct Complaint Investigations</u> .....	29
<u>Decisions Issued</u> .....	30
<u>Requests for Review</u> .....	32
<u>Disciplinary Hearings</u> .....	33
<u>Performance Measures</u> .....	34
<u>Appendix</u> .....	38
<u>Police Service Act Screening Decisions</u> .....	38
<u>Explanatory Notes</u> .....	47

# Complaints Director's Message

The two most significant events since our agency's founding in 2009 occurred this past year: the proclamation of the Community Safety and Policing Act (CSPA) on April 1, 2024, and the Nishnawbe Aski Police Service Board (NAPSB) opting into the CSPA on December 10, 2024.

The CSPA marks a watershed in policing oversight. Under this new legislative framework, the Ontario Provincial Police Commissioner, municipal Chiefs of Police, and the Chief of the Nishnawbe Police Service (NAPS) are required to notify me when they become aware of potential misconduct by their sworn police officers. Through these notifications, I become aware of evolving issues in policing at the earliest possible time and proactively resolve them for the benefit of all concerned.

At the Queen's Park signing ceremony announcing a \$514 million investment to support NAPSB opting into the CSPA, Grand Chief Alvin Fiddler said: "It is vital that our dedicated officers have the supports they need to serve our members in a safe and culturally appropriate way." As an integral part of the CSPA, our agency takes Grand Chief Alvin Fiddler's words to heart. His message resonated with us, affirming our commitment to serving the members of the thirty-four First Nations policed by NAPS in a culturally appropriate way. Long before this historic announcement, and continuing since, we have worked humbly and diligently to build relationships, beginning in a good way – by listening, learning, and adapting to the needs and aspirations of the First Nations communities we now serve.



Stephen Leach  
**Complaints Director**

One year into the CSPA, the hard work and dedication of agency staff in preparing for this transition, has laid a strong foundation for the work ahead. While this journey has just begun, we are maintaining open communications with the NAPSB and NAPS and are collaborating with them to serve First Nations communities. Similarly, our notifications process is well received because we are quickly and proactively identifying conduct issues requiring investigation by our agency.

As we continue adjusting to the volume and complexity of our new responsibilities under the CSPA, we embrace these historic changes as opportunities to improve. This year we are focusing on leveraging existing resources by exploring Artificial Intelligence and working with the Cabinet Office's Lean, Strategy, and Innovation Division (LSID). Both projects are designed to improve process, so we can help people faster. Ultimately, the success of these projects will be determined by how they deepen our commitment to timeliness, transparency, and accountability.

# Vision, Mission, Values

The Law Enforcement Complaints Agency (LECA) is an independent civilian oversight agency, responsible for receiving, managing, and overseeing public complaints about misconduct of police officers, special constables of Niagara Parks Commission and peace officers of the Legislative Protective Service. LECA is an arm's-length regulatory agency of the Ontario Ministry of the Attorney General (MAG) and the decisions are independent from the Ontario Government, the police, and the community. The agency receives its legislative authority from Part VIII and Part X of the CSPA.

LECA ensures that public complaints are effectively dealt with in a manner that is transparent and fair to both the public and the police by:

- overseeing and investigating public complaints and notifications about the misconduct of police officers through to their conclusion.
- conducting detailed reviews of conduct investigations by police services when requested by public complainants.
- encouraging the resolution of complaints through alternative dispute resolutions.
- providing education to both the public and police.
- reviewing and making recommendations regarding issues of a systemic nature.

LECA's **vision** is to enhance confidence in the public complaints system through excellence in the independent and impartial oversight of police.

The agency's **mission** is to provide effective management and oversight of public complaints and notifications about the misconduct of police officers, promote accountability of police services across Ontario and increase confidence in the public complaints system. In fulfilling its mandate, LECA is guided by the principles and values of:

- **Accountability:** Improving transparency and accountability of the public complaints system and maintaining accountability for actions to stakeholders.
- **Integrity:** Providing professional, objective, timely services to all stakeholders, respecting the privacy and dignity of stakeholders and treating them fairly.
- **Independence:** Overseeing investigations by police services in a fair, transparent, and effective manner and conducting independent investigations thoroughly and fairly.
- **Accessibility:** Building public awareness about the complaints system and being accessible to the public so that complaints about police can be made.

LECA's mandate aligns with the Ontario government's priority of promoting fairness, providing access to justice. Further, it aligns with MAG's vision of an innovative, sustainable, and responsive justice system that promotes public confidence and upholds the rule of law. LECA's mandate also aligns with the ministry's strategic plan priorities, including:

- access to modernized and streamlined client-centred programs and services supported by technology.
- supporting, protecting, and advocating for victims and vulnerable individuals, including those with mental health and addiction issues.
- developing and retaining a diverse, skilled, and engaged workforce.
- promoting accountability across justice system partners.

# Organizational Structure

The head of LECA, the Complaints Director is appointed by the Lieutenant Governor in Council on the Attorney General's recommendation. The CSPA requires that the Complaints Director cannot be a former or current police officer.

In fiscal 2024-25, LECA had an allocation of 52 full-time employees. All LECA employees are civilians and cannot be serving police officers.

LECA is divided into the following operational units:

## **Executive Office**

- provides direction and makes decisions in accordance with the LECA mandate, powers and role regarding investigations and public hearings.
- acts as the public face of LECA.
- provides strategic and operational direction for the agency.
- liaise with police services boards, the chiefs of police, and other oversight agencies.

## **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.
- leads the agency in providing accommodations under the Accessibility for Ontarians with Disabilities Act (AODA) and Human Rights Code.
- creates and maintains records and case management reporting processes.

## **Investigations**

- finalizes public complaint screening process.
- 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.

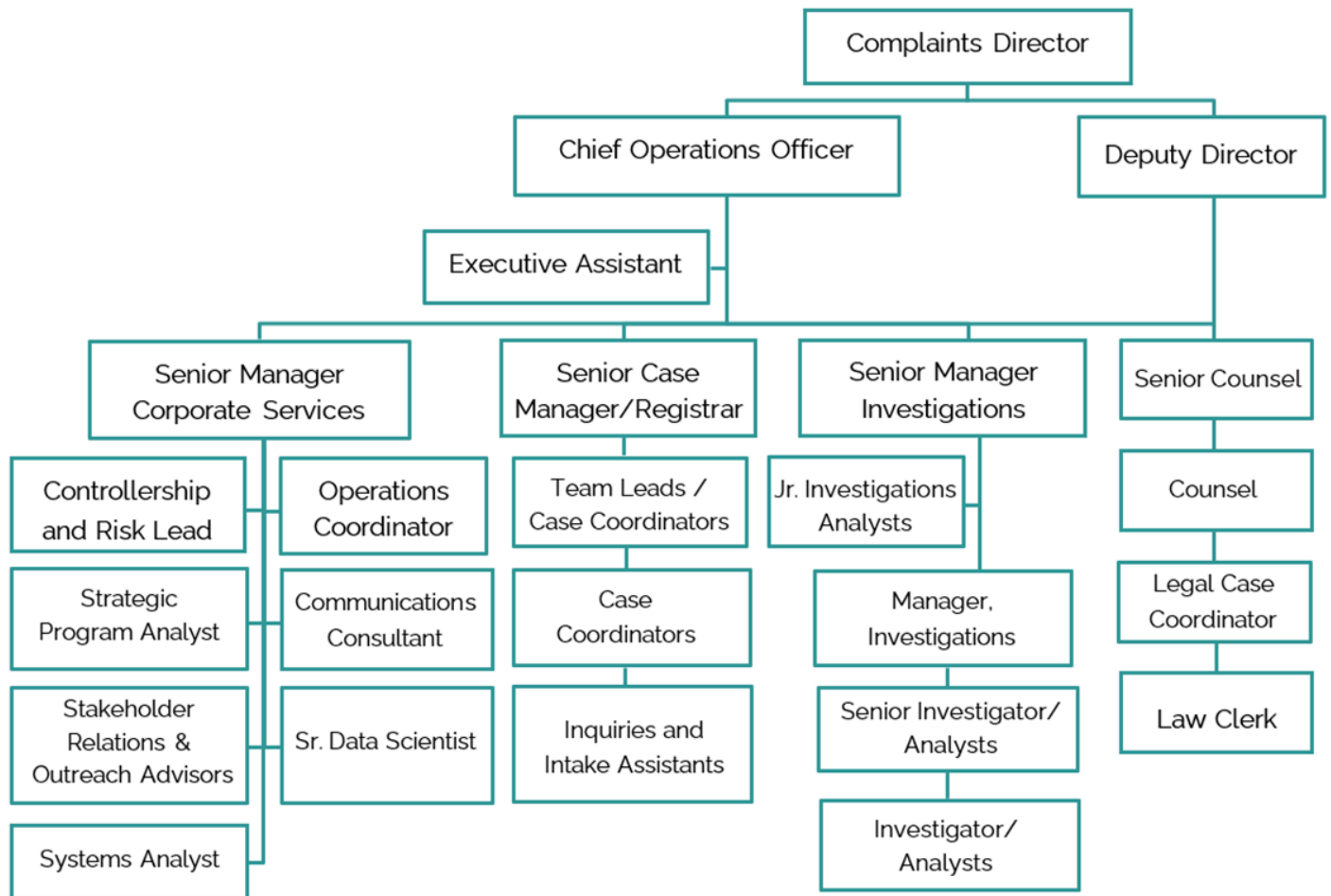
## **Legal Services**

- 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 (OPAAC), 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.

# Organizational Chart





# Financial Expenditures

The tables below outline LECA's budget allocation and financial expenditures for the 2024-25 fiscal year.

## Financial Expenditures 2024-25

Initial Allocation	\$7,518,700.00
Adjusted Allocation	\$7,791,300.00
Expenditures	\$7,705,266.51

## Year-End Expenditures 2024-25

Salaries and Wages	\$6,334,820.05
Benefits	\$880,992.90
Transportation and Communication	\$53,060.00
Services*	\$415,473.72
Supplies and Equipment	\$20,919.84
<b>Total</b>	<b>\$7,705,266.51</b>

\*Services expenditures include, but are not limited to, information technology, translation, and training costs.

LECA's Complaints Director Remuneration

Appointee Annual Remuneration 2024-25		
Appointee	Total Annual Remuneration	Per Diem Remuneration Rate
Stephen Leach, Complaints Director	\$224,441.21	N/A

# New Legislation: Community Safety and Policing Act

The CSPA came into effect on April 1, 2024, replacing the Police Services Act (PSA), and marked the transition of the Office of the Independent Police Review Director (OIPRD) to LECA. Under the CSPA, LECA continues to receive, manage, and oversee public complaints about the misconduct of police officers in Ontario, just as it did previously as the OIPRD.

LECA oversees complaints involving municipal, regional, and provincial police services, and with LECA's expanded jurisdiction, Special Constables employed by the Niagara Parks Commission, Peace Officers of the Legislative Protective Service, and First Nations police officers if their service opts in to the CSPA. A key milestone in this expansion occurred on December 10, 2024, when the Nishnawbe Aski Police Service Board (NAPSB) opted in.

LECA reviews complaints or notifications about police misconduct from many sources, including members of the public, police services boards, the Special Investigations Unit (SIU), the Inspector General of Policing, the Solicitor General, Chiefs of Police and the OPP Commissioner.

LECA is no longer responsible for complaints about policy and service, which is the responsibility of the Inspectorate of Policing (IoP), or posting disciplinary hearing decisions, which is the responsibility of the Ontario Police Arbitration and Adjudication Commission (OPAAC).

As before, the Complaints Director may conduct systemic reviews of matters related to police conduct, and now has the authority to initiate a conduct investigation in the absence of a public complaint.

In the first year under the CSPA, LECA has embraced these shifts as opportunities for growth and improvement, enhancing its processes and deepening its ongoing commitment to transparency, accountability, and timeliness.

# Accomplishments and Key Priorities

Over the last year, LECA has concentrated on implementing the changes outlined in the CSPA and facilitating a seamless transition. The agency committed substantial resources to preparing for the expansion of its mandate, which included creating new policies and procedures, enhancing its data management system, broadening outreach strategies, and providing staff training to support these changes.

This section highlights the key accomplishments and priorities that have shaped LECA's progress over the past year. It outlines the significant milestones achieved in response to the expanded mandate, as well as the strategic initiatives that will guide the agency's continued growth and effectiveness. These accomplishments reflect LECA's commitment to adapting and advancing its operations.

## **Training**

### **LECA Respectful Engagement and Indigenous Awareness Training**

LECA developed and delivered a comprehensive two-part training series on Respectful Engagement for all staff members. The training was designed to deepen staff cultural awareness and understanding to foster respectful and meaningful relationships with Indigenous communities and complainants.

### **National Day for Truth and Reconciliation Learning Event**

LECA staff hosted a National Day for Truth and Reconciliation learning session. During this session, staff heard from guest speakers and learned about the Truth and Reconciliation Commission of Canada. The session also highlighted LECA's internal working group dedicated to developing strategies to build trust and raise awareness of the agency's ongoing efforts to strengthen relationships with Indigenous communities.

### **Implicit Bias Training**

All LECA staff participated in mandatory Implicit Bias training that focused on increasing awareness of how unconscious biases form and persist. Staff learned to recognize different types of implicit bias, and how to address them. This training emphasized the individual responsibility of creating a more inclusive and respectful work environment.

### **Self-initiated Investigations Training**

LECA staff received training on the agency's new process for self-initiated investigations under the CSPA. This training focused on the agency's protocols on how to assess and review situations that may require the Complaints Director to begin an investigation in the absence of a public complaint.

### **Thematic Training**

The CSPA requires the Complaints Director, the Deputy Complaints Director, and Law Enforcement Complaints Agency Investigators, to successfully complete the minister-approved training (Thematic Training):

1. Regarding human rights and systemic racism;
2. Promoting recognition and respect for the diverse, multicultural, and multiracial nature of Ontario society; and,
3. Promoting recognition and respect for the rights and cultures of First Nations, Inuit and Métis peoples.

### **LEAN White Belt**

LECA, with the support and guidance of the Cabinet Office's Lean, Strategy, and Innovation Division (LSID), has implemented lean strategies to optimize its operational processes. As part of this initiative, all staff have received Lean White Belt certifications, to enhance efficiency and improve task completion.

### **Mental Health – Resiliency in the Workplace**

TELUS Health delivered a Resiliency in the Workplace workshop to staff. The workshop focused on exploring factors that contribute to resilience, recognizing how attitudes, actions and choices contribute to resilience, and strategies for thriving under pressure, including in the face of organizational change.

### **LECA Townhall**

LECA hosted a productive Fall Townhall; a CSPA mid-year check-in, and the Executive Management Team attended unit level meetings to discuss end-of-year agency performance, share the vision for the future state of the agency and provided a forum for staff to share their insights.

## **New Policies, Procedures and Protocols on Key Transitional Items**

To ensure staff were equipped to effectively work within the agency's expanded mandate and with the people it serves, LECA developed new policies, procedures, and protocols:

### **Local Response Protocol**

LECA developed a protocol to define the Local Response process, defined under Rule 7 of the LECA Rules of Procedure. Local Response allows members of the public to raise concerns about police conduct directly with the respective police service, where an officer can address the issue informally at the local police station. The protocol ensures a clear and consistent process, with a standardized form to support the process.

### **Self-Initiation Protocol**

Under the CSPA, the Complaints Director has the authority to initiate investigations if it is in the public interest to do so, even in the absence of a formal public complaint. In response, LECA developed an internal protocol to guide staff through the process of identifying and reviewing matters that may be considered for a self-initiated investigation.

### **Respectful Engagement Guideline for Staff**

The agency developed a Respectful Engagement Guideline to support LECA staff in approaching their work in a culturally sensitive and respectful way. Since the nature of work varies across units, this guide serves as a supplemental resource, alongside unit-specific procedures, to ensure staff communicate effectively, collaborate, and build trust with Indigenous peoples and organizations. The guideline was developed with insights from various ministries, as well as lessons learned and feedback from past engagements with Indigenous communities and organizations.

### **Complaints Handling Policy**

LECA developed a Complaints Handling Policy to ensure complaints about the agency's services are addressed and resolved in a timely, fair, and consistent manner. This policy is focused on service-related complaints and not public complaints about police conduct. The policy aims to enhance the agency's ability to resolve complaints effectively, improve service delivery and maintain positive relationships with stakeholders, and promote a culture of accountability and transparency within LECA.

### **Interpreter Services Protocol**

In response to an increase in requests for services in French, LECA developed a Language Interpreter Services Protocol to support better access and service for French-speaking complainants. As part of this work, the agency secured access to a third-party interpretation provider, offering both scheduled or immediate French interpretation services by phone or through an online platform. The new protocol outlines clear steps for LECA staff to request and use these services, helping to ensure timely, consistent, and accessible communication for members of the public.

The agency consistently reviews and updates its policies, procedures, protocols, and best practices to ensure effective decision-making and to streamline operations throughout the organization.

### **Outreach and Engagement Efforts**

As part of its commitment to enhancing public confidence in the complaints system and ensuring effective management and oversight of public complaints and notifications, LECA upholds its guiding principles of transparency, accountability, and public engagement.

LECA is committed to continuous outreach and engagement, actively listening and learning from all stakeholders to improve its services and practices. Over the past year, LECA participated in several outreach initiatives.

Presentations on LECA's mandate, specific to the CSPA, and investigations were delivered by investigative staff to the:

- Toronto Police College
- Municipal and Regional Police Services
- Niagara Ontario Association of Chiefs of Police Regional meeting
- Police Association of Ontario
- Law of Policing Conference
- Canadian Association for Civilian Oversight of Law Enforcement (CACOLE)
- Halifax Law of Policing Conference

In addition to LECA's ongoing commitment to outreach and engagement with all communities across Ontario, the agency has continued its efforts to engage with Indigenous peoples, organizations, as well as First Nations police services.

Agency staff met with, listened, and learned from Indigenous peoples, First Nations police services, and Indigenous community organizations to learn how LECA can adapt its service models. Some of the organizations the agency listened and learned from, as well as the events attended, include:

- Nishnawbe Aski Nation
- Nishnawbe Aski Nation Women's Gathering
- Nishnawbe Aski Police Service
- City of Thunder Bay Maamawe Summer Festival and Showcase
- City of Thunder Bay National Indigenous Day

## **Diversity and Inclusion Initiatives**

LECA has been a leader in creating a diverse and inclusive work environment by actively identifying and addressing bias and systemic barriers within the recruitment process. The agency utilizes a diverse hiring panel to promote fairness, and shares job opportunities with other Ontario Public Service (OPS) network groups and they include:

- Black OPS Employee Network
- East Asian Network
- Francophone Employee Network
- Organization for Hispanic and Latin American OPS
- Nation to Nation OPS Employee Network
- OPS Pride
- South Asian Network
- Disability Advisory Council

In addition, when posting job opportunities externally, the agency ensures that these opportunities are also on various platforms such as:

- Aboriginal Job Board
- Indigenous Careers
- First Nations Jobs Online
- Métis Nation of Ontario Job Board



LECA continues to be a part of the Mentoring for Career and Inclusion Program. This program offers participants the opportunity to obtain guidance on career development and planning, while sharing experiences related to diversity and inclusion in the workplace. It provides a way for employees to act on progressing their career and professional development.

LECA established a Social Committee for staff to help foster a positive, inclusive, and connected workplace culture. The committee organizes and plans events throughout the year that bring staff together to support team morale, staff engagement, and well-being.

### **New Case Management System (CMS)**

A new case management system was launched in April 2024 and continues to have increasing success in the handling of caseloads. The system continues to eliminate the redundancies in the legacy system, streamline complaints processing, and improve efficiency in responding to requests for information. New updates and features of the CMS include:

- LECA e-file data can be downloaded into the new CMS.
- Complaints streamed into the appropriate path for resolution (investigation, early resolution, etc.)
- Reports and data can be created and collected through dashboards. Data exported seamlessly.
- A new statistic tool has been rolled out to track cases.
- New enhancements created in the CMS for better workflow.
- New dashboards and reports from CMS were built (36 reports / dashboards).

### **Freedom of Information, Records Management and Privacy Matters**

The agency received and processed 18 Freedom of Information requests from members of the public and consulted on 17 requests between April 1, 2024, to March 31, 2025. All matters have been closed; however, one appeal is currently in progress with the Information and Privacy Commissioner of Ontario (IPC).

### **De-Identified Summaries**

Section 167(2) of the CSPA requires the Complaints Director to publish de-identified summaries of unsubstantiated allegations on the LECA website. This applies to public complaints investigations that are conducted by the Complaints Director and those that are conducted by a police service. From April 1, 2024, to March 31, 2025, LECA posted 85 De-identified Summaries on its website.

# Making a Complaint

## Formal LECA Complaint

LECA's jurisdiction includes municipal and regional police services, the OPP special constables of Niagara Parks Commission, peace officers of the Legislative Protective Service, and officers of NAPS as of December 10, 2024. Currently, LECA does not have jurisdiction over First Nations police officers whose services have not opted into the CSPA, RCMP officers, provincial offences officers, or special constables, including TTC Special Constables, GO Transit police, court officers, and campus police.

LECA accepts complaints about:

- The conduct of an officer: how a police officer behaves.

Any person may make a complaint with LECA except for certain individuals listed under section 154(2) of the CSPA. Upon receipt of a complaint, LECA reviews the contents of the complaint on its face and any subsequent information provided by a public complainant. After reviewing the complaint, LECA may decide to screen out the complaint if the complainant is not:

- a person at whom the conduct was directed.
- a person who saw or heard the conduct or its effects as a result of being physically present at the time and place that the conduct or its effects occurred.
- a person who,
  - (i) was in a personal relationship with a person described in at the time that the conduct occurred, and
  - (ii) suffered loss, damage, distress, danger or inconvenience as a result of the conduct.

If a member of the public has a conduct complaint about a police officer and does not wish to pursue the formal LECA complaint process, they have two options for resolving the matter:

### **1. Conversation**

A complainant can go to a police station and have a conversation directly with the officer in charge to clear up a question or issue. These conversations are not tracked by LECA and are outside the public complaints system. If the complainant remains unsatisfied with the results of this conversation, they can file a complaint with LECA about the underlying incident.

## 2. Local Response

Local Response is the process for dealing with concerns from members of the public informally. The process is defined under Rule 7 of the [LECA Rules of Procedure](#). A complainant can go to a police station to have a minor issue addressed. A local response will allow the police service to solve, explain, or settle a matter directly with the complainant.

If a complaint is successfully resolved through local response, the police service must send the completed Local Response form, signed by the complainant and the chief or the chief's designate, to LECA. In 2024-25, there were 104 Local Responses completed by police services in Ontario. Additional information about local response can be found on the LECA [website](#).

# Complaints Workload

LECA had a total complaints workload of 7,237 complaints in 2024-25, which included 6,216 complaints received between April 1, 2024, and March 31, 2025, and 1,021 complaints carried over the previous year. These statistics encompass both CSPA and \*PSA statistics.

Complaints Workload in 2024-25	
Carried Over from a Prior Fiscal Year	1,021
Received During the Fiscal Year	6,216
<b>Total Complaints Workload</b>	<b>7,237</b>
Conduct Complaints	5,611
Notifications Received	329
Successful Early Resolution (ER)	102
*Service Complaints	310
*Policy Complaints	49
Withdrawn Prior to Screening	99
Not Yet Classified	737

\*A more fulsome breakdown of the PSA statistics is supplied in the [Appendix](#).

### Complaints Received in 2024-25

E-File Complaints	5,854
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Paper Files	362
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<b>Total Complaints Received</b>	<b>6,216</b>
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Notes:

94% of complaints were filed electronically.

# Alternative Dispute Resolution

LECA offers several ways to resolve complaints throughout the complaints process.

## Early Resolution (ER)

ER provides an opportunity for complainants and respondent officers to voluntarily resolve complaints before the complaint is sent for investigation. Complainants can simply check off the ER box in the complaints form to initiate the ER process so that their complaints can be assessed for ER eligibility.

In 2024-25, 421 complaints were considered for ER under the CSPA.

Early Resolutions by Outcome	
Withdrawn During ER	18
ER Unsuccessful	81
Declined	202
Successful	72
In Progress, Carried into Next Fiscal Year	48
Total	421

# Screening Decisions

LECA screened a total of 5,523 complaints in 2024-25. All complaints are presumed to be screened in, unless there is a reason to screen out the complaint under s. 158 of the Community Safety and Policing Act, 2019.

The Complaints Director can exercise their discretion to screen out a complaint based on the criteria in the CSPA. When a complaint is screened out, the matter is closed, and a letter is sent to the complainant and the police chief or Commissioner with reasons why the matter was not sent to investigation.

Complaints Screened 2024-25			
	Screened In	Screened Out	Total
Conduct Complaints	1,208	2,492	3,700
Service Complaints	0	211	211
Policy Complaints	0	23	23
<b>Total</b>	<b>1,208</b>	<b>2,726</b>	<b>3,934</b>

### Conduct Complaints Screened Out\*

Better Dealt With Under Another Act or Law	33
Consolidated Complaint	58
Frivolous	254
Not in the Public Interest	1,210
Guideline 001	693
Lost Jurisdiction	11
No Jurisdiction	150
Over Six Months	1
Third-Party Criteria Not Met	73
Vexatious	8
Abandoned	1
<b>Total</b>	<b>2,492</b>

\*Category definitions are outlined in the Explanatory Notes, under the [Appendix](#).



# Notifications and Self Initiation

## Notifications

Under the CSPA and the Special Investigations Unit (SIU) Act, the following entities are required to notify the Complaints Director of police misconduct:

- the Solicitor General
- police services boards
- the SIU
- the Inspectorate of Policing (IoP)
- Chiefs of Police (Chiefs), and
- the Ontario Provincial Police Commissioner (Commissioner).

In accordance with Rule 14 of LECA Rules of Procedure, all notifications of potential misconduct must be provided to the Complaints Director through e-Notification. E- Notifications must outline details of the potential misconduct and sufficient information to assist the Complaints Director in his review.

Once the e-Notification is received, it is triaged and reviewed by LECA staff before a recommendation is made to the Complaints Director. Based on the information provided and having regards to the public interest criteria, the Complaints Director will decide whether to initiate an investigation into the alleged misconduct or take any other action, including, initiating a systemic review, or issuing a Notice of Inquiry and Examination under LECA Rules of Procedure.

## Public Interest Criteria

In accordance with the CSPA and the LECA Rules of Procedure, in determining whether an investigation should be initiated or continued, the following non-exhaustive list of public interest criteria would be considered:

- the nature of the allegations of misconduct
- whether the conduct has been or is currently the subject of an investigation under CSPA or PSA
- whether the conduct could be more appropriately dealt with, in whole or in part, under another Act or law or in another adequate forum
- whether a decision to not conduct or continue an investigation would negatively impact public confidence in policing
- whether an investigation is reasonably practicable, having regard to the information or evidence available

- the capacity of the police service to conduct a full investigation, having regard to the size of the service, resources available, competing demands and anticipated complexity or length of the investigation
- whether the misconduct raises issues of systemic importance or issues that are sensitive in nature or involves vulnerable individuals or communities
- any particular challenges presented by the investigation which may require the exercise of the investigative powers as set out in s. 137 to 140 of the CSPA
- any potential conflict of interest or risk of perception of conflict of interest if the complaint is investigated by a police service
- whether the matter involves more than one police service or cross-border issues
- whether the matter is the subject of an SIU investigation or related criminal proceeding.
- the geographic location where the complaint arose, having regard to the availability of investigators and accessibility of witnesses
- whether the respondent officer is one to whom the Interprovincial Policing Act, 2009 applies
- whether a decision to not retain an investigation would negatively impact public confidence in policing; and
- the public interest in ensuring that investigations of public complaints are thorough, independent and accountable.

### **Self Initiation**

Under the CSPA, in the following circumstances, absent of a complaint, the Complaints Director may cause an investigation to be conducted if, he believes, it is in the public interest to do so:

- potential misconduct comes to the attention of the Director as a result of a public complaint but is not the subject of the complaint.
- potential misconduct that comes to the attention of the Director through a notification by (A) the SIU Director, (B) Inspector General, (C) a Chief of Police, (D) a police service board or (E) the Minister.
- Or potential misconduct of anyone who falls within our mandate that otherwise comes to the attention of the Complaints Director.

If the Complaints Director decides to initiate an investigation, he must provide notice of the decision, along with reasons, to the subject of the investigation, and the chief of police. If the Complaints Director decides not to initiate an investigation, he must provide notice of his decision to the notifying entity, if any.

Anonymous complaints that are submitted to LECA will not be considered a public complaint under the CSPA, but they may be reviewed and considered by LECA for the purposes of self-initiated investigation under section 161(1) of the Act.

In 2024-25, LECA received a total of 326 Notifications.

#### Notifications Received 2024-25

Source	Screened In	Screened Out	Total
Chiefs of Police	1	225	226
OPP Commissioner	1	89	90
Inspector General		4	4
SIU	2	4	6
<b>Total</b>			<b>326</b>

In 2024-25, LECA self-initiated 3 complaints, within the year.

#### Self Initiated by the Complaints Director 2024-25

<b>Total</b>	<b>3</b>
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# Redirection of Service and Policy Complaints to the Inspectorate of Policing

LECA no longer has jurisdiction over policing policy, service, and complaints regarding members of police service boards as of April 1, 2024. However, LECA continues to receive and screen complaints about the services and policies of a police organization with incident dates that predate April 1, 2024, under the PSA.

All service and policy complaints that are sent to LECA are redirected to the Inspectorate of Policing to review matters involving the adequacy and effectiveness of police services.

## Service Complaint Outcomes 2024-25 Incident date(s) after April 1, 2024

Redirected to Inspectorate of Policing	211
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<b>Total</b>	<b>211</b>
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## Policy Complaints Screened Out Reasons Incident date(s) after April 1, 2024

Redirected to Inspectorate of Policing	23
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<b>Total</b>	<b>23</b>
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# Conduct Complaint Investigations

With a few exceptions, conduct complaints may be investigated by LECA, the police service in question, or another police service. The Complaints Director has discretion in determining who should conduct the investigation. LECA oversight continues throughout the process. Complaints against the chiefs/deputy chiefs, Commissioner/deputy commissioners of the OPP, as well as peace officers of the Legislative Protective Service must be retained by LECA for investigation. Investigations initiated in the public interest and in the absence of a public complaint must also be retained by LECA.

## Referred

The Complaints Director can refer a complaint to the same police service or to a different police service for investigation. When a complaint is referred to a service, it is investigated by an officer from the service's professional standards branch or by an officer designated by the police chief. LECA oversees investigations conducted by police services. Following an investigation, the investigative report, along with the chief's decision, is sent to the complainant, the respondent officer, and LECA. LECA reviews the investigative report, and if issues are identified, the Complaints Director will instruct the police service appropriately.

## Retained

Investigations are conducted by LECA investigators at the direction of the Complaints Director, in consultation with the Senior Manager of Investigations and Legal Counsel. Ultimately, the Complaints Director determines whether evidence discloses reasonable grounds to believe misconduct occurred or not. Investigators endeavour to ensure that conduct complaint investigations are concluded within 120 calendar days. Complaints retained by the agency are often more complex.

Total Conduct Complaints Sent for Investigation in 2024-25	
Referred to the Same Police Service	1,211
Referred to a Different Police Service	19
Retained by LECA for Investigation	4
<b>Total</b>	<b>1,234</b>

# Decisions Issued

The Code of Conduct for police officers, contained in Ontario Regulation 407/23, identifies 5 classes of misconduct for investigation and possible discipline:

- Compliance with laws
- Human rights and the Charter interactions with the public integrity performance of duties
- Interactions with the public
- Integrity
- Performance of duties

Conduct of special constables of Niagara Parks Commission is governed by the Code of Conduct for special constables contained in Ontario Regulation 410/23.

## Substantiated and Unsubstantiated

At the end of an investigation, the allegations in a complaint are determined to be substantiated or unsubstantiated. The CSPA states that in order for a complaint to be substantiated, there must be reasonable grounds to believe that misconduct occurred.

If the complaint is substantiated, pursuant to sections 200 and 202 of the CSPA disciplinary measures may be imposed on the officer or the matter may proceed to a hearing. If the complaint was investigated by a police service and it is unsubstantiated because there are no reasonable grounds to conclude a violation of the police Code of Conduct occurred, the complaint is closed, subject to a request for a review of the chief's or Commissioner's decision.

### Conduct Complaints Decisions Issued, by Main Finding 2024-25

Unsubstantiated	225
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Substantiated	15
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<b>Total</b>	<b>240</b>
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### Conduct Complaints Sent for Investigation - Closed for Other Reasons

Informally Resolved	254
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Withdrawn	216
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Discontinued (s. 164)	67
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<b>Total</b>	<b>537</b>
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# Requests for Review

If a conduct complaint was referred to a police service for investigation and the chief or Commissioner has found no misconduct, the complainant has 30 days to submit a request for review to LECA. Once the request for review is received, submissions are sought from both the complainant and the Police Service, and the investigative file is reviewed and evaluated.

Upon completion of the review, the Complaints Director may confirm the chief's decision, or overturn or vary the misconduct decision. If deficiencies are found in the way the investigation was conducted, the Complaints Director may send the matter back to the police service with directions to the chief for further investigation, or LECA can take over the investigation or send it to another police service for investigation.

## Requests for Review 2024-25

### Requests for Review Received

Received During 2024-25	46
<b>Total Managed</b>	<b>46</b>

### Request for Review Decisions

Assign Second Investigation to Same Police Service	1
Chief's Decision Confirmed	21
<b>Total Decisions</b>	<b>22</b>

<b>Total Request for Reviews Open and Carried Over Into 2025-26</b>	<b>24</b>
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# Disciplinary Hearings

LECA is no longer responsible for posting disciplinary hearing decisions on its website. This responsibility now lies with the OPAAC. Decisions relating to incidents occurring prior to April 1, 2024 will continue to be posted on the [LECA website](#).

# Performance Measures

The agency tracks performance measures (PM) for both the agency and police services for activities relating to the public complaints process. Listed below are several of the performance measures and targets, as well as a comparison to 2023-24 achievement results.

## Police Service Performance Measures

Police Service Performance Measures			
Performance Measure	Target	2023-24 Achieved	2024-25 Achieved
Seven-day local response	75%	89%	86%
45-day early resolution	80%	99%	97%
*60-day report for policy/service complaints	60%	60%	54%
120-day conduct complaint investigation - referred	65%	65%	65%

\*These performance measures include policy and service complaints with incident dates prior to April 1, 2024. Incident dates after April 1, 2024, were all transferred to the Inspectorate of Policing.

### Seven-day Local Response

Police services have seven days after the completion of a Local Response to send the completed "Local Response Summary Form" to the agency. 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**

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 complaint enters to early resolution process to the date that the early resolution process is completed. Only complaints where all parties agree to proceed to early resolution are included in this PM. This PM captures early resolution files whose 45-business day deadline falls within the fiscal year.

### **60-day Report for Policy or Service Complaints**

Police Chiefs are required to complete a report responding to policy and service complaints within 60-days of referral from the agency. The agency's case management system tracks receipt of the 60-day report and alerts the assigned law clerk of upcoming due dates. This PM includes reports that were due within the fiscal year. Incident dates that are after April 1, 2024, are transferred to the Inspectorate of Policing.

### **120-day Conduct Complaint Investigation - Referred**

Investigators endeavour to ensure that conduct complaint 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 complaints where the deadline date falls within the fiscal year.

## LECA Performance Measures

LECA Performance Measures			
Performance Measure	Target	2023-24 Achieved	2024-25 Achieved
Two-day intake	85%	99%	94%
15-day audit	90%	88%	92%
30-day case management analysis	80%	96%	52%
60-day request for review	60%	34%	74%
120-day conduct complaint investigation - retained	50%	17%	17%
12-month end-to-end complaint processing	90%	98%	98%

### Two-day Intake

LECA endeavours to complete the intake process for new complaints 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

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 complaints where the 15-day deadline date falls within the fiscal year.

### **30-day Case Management Analysis**

Once a complaint 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 complaints where the 30-day screening deadline falls within the fiscal year.

### **60-day Request for Review**

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 agency endeavors to complete the review within 60 calendar days of receiving the disclosure. This PM includes files where the 60-day deadline date falls within the fiscal year.

Under the CSPA, section 167 (4), the review timeline changed from 30 to 60 days.

### **120-day Conduct Complaint Investigation – Retained**

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 was retained by the agency until the date the Complaints Director issues a decision. The PM includes complaints whose 120-day deadline date falls within the fiscal year.

### **12-month Complaint Processing**

The agency endeavours to fully process all complaints within 12 months of the date they are received. This includes all processes that a complaint may enter during its lifecycle (Screening, Investigation, Request for Review, Early Resolution, etc.). This is measured from the date the complaint is received to the date the file is fully closed. This measure includes any complaint where the 12-month deadline falls within the fiscal year.

# Appendix

## Police Service Act Screening Decisions

The statistics shown in the appendix are of complaints screened under the Police Service Act (PSA).

Complaints Screened 2024-25			
	Screened In	Screened Out	Total
Conduct Complaints	515	992	1,507
Service Complaints	51	12	63
Policy Complaints	18	1	19
Total	584	1,005	1,589

# Appendix

## Early Resolution (ER)

In 2024-25, 145 complaints were considered for ER under the PSA.

Early Resolutions by Outcome 2024-25	
Withdrawn During ER	8
ER Unsuccessful	25
Declined	79
Successful	30
In Progress, Carried into Next Fiscal Year	3
<b>Total</b>	<b>145</b>

## Conduct Complaints Screened Out

Better Dealt With Under Another Act or Law	28
Consolidated Complaint	36
Frivolous	125
Not in the Public Interest	444
Guideline 001	202
Lost Jurisdiction	12
No Jurisdiction Under Section 58	47
Over Six Months	49
Third-Party Criteria Not Met	25
Prior to Proclamation (2009 LECA Proclamation)	20
Vexatious	4
<b>Total</b>	<b>992</b>



## Service Complaints

### Service Complaint Outcomes 2024-25

Withdrawn	29
Action Taken	2
No Action Taken	51
Informally Resolved	3
Screened Out	223
Open and Carried into the Next Fiscal Year	2
<b>Total</b>	<b>310</b>

### Service Complaint Screened Out Reasons

Frivolous	1
No Jurisdiction S.58	1
Not in the Public Interest	10
<b>Total</b>	<b>12</b>

### Policy Complaint Outcomes 2024-25

Withdrawn	3
Action Taken	1
No Action Taken	19
Screened Out	24
Open and Carried into the Next Fiscal Year	2
<b>Total</b>	<b>49</b>

### Policy Complaints Screened Out Reasons

Not in the Public Interest	1
<b>Total</b>	<b>1</b>

Decisions Issued

The Code of Conduct for police officers, contained in Ontario Regulation 268/10, identifies ten classes of misconduct for investigation and possible discipline:

- discreditable conduct
- insubordination
- neglect of duty
- deceit
- breach of confidence
- corrupt practice
- unlawful or unnecessary exercise of authority
- damage to clothing or equipment
- consumption of drugs or alcohol in a manner prejudicial to duty
- conspiring, abetting, or being an accessory to misconduct

Total Conduct Complaints Sent for Investigation in 2024-25	
Referred to the Same Police Service	514
Referred to a Different Police Service	19
Retained by LECA for Investigation	4
Total	537

Substantiated and Unsubstantiated

At the end of an investigation, the allegations in a complaint are determined to be substantiated or unsubstantiated. The PSA states that in order to substantiate, there must be reasonable grounds to believe that misconduct occurred. If the complaint is substantiated, it will be classified as serious or less serious. Section 85 of the PSA includes prescribed outcomes for discipline of violations of the Code of Conduct.

If the complaint was investigated by a police service and it is unsubstantiated because there are no reasonable grounds to conclude a violation of the police Code of Conduct occurred, the complaint is closed, subject to a request for a review of the chief's or Commissioner's decision. If LECA investigates the complaint, the only means to review the decision is by a judicial review.

Conduct Complaints Decisions Issued, by Main Finding 2024-25	
Unsubstantiated	438
Substantiated Less Serious	41
Substantiated Serious	6
Total	485

Conduct Complaints Sent for Investigation - Closed for Other Reasons	
Informally Resolved	124
Withdrawn	142
Discontinued (s. 72)	39
Total	305

## Requests for Review

If a conduct complaint was referred to a police service for investigation and the chief or Commissioner has either found no misconduct or less serious misconduct, the complainant has 30 days to submit a request for review to LECA. Once the request for review is received, submissions are sought from both the complainant and the Police Service, and the investigative file is reviewed and evaluated.

Upon completion of the review, the Complaints Director may confirm the chief's decision, or overturn or vary the misconduct decision and direct that a disciplinary hearing be held if the misconduct is deemed serious. If deficiencies are found in the way the investigation was conducted, the Complaints Director may send the matter back to the police service with directions to the chief for further investigation, or LECA can take over the investigation or send it to another police service for investigation. The Complaints Director's decisions are final, subject to an application for judicial review in the Ontario Superior Court.

## Requests for Review 2024-25

### Requests for Review Received

Received During 2024-25	73
Received During a Prior Fiscal Year	141
<b>Total Managed</b>	<b>214</b>

### Request for Review Decisions

Assign Second Investigation to Same Police Service	23
Chief's Decision Confirmed	161
LECA Takes Over Investigation	2
Chief's Decision Varied	4
<b>Total Decisions</b>	<b>190</b>

### Outcomes

Unsubstantiated	157
Substantiated Less Serious	20
Substantiated Serious	2
<b>Total Outcomes</b>	<b>179</b>
<b>In Reinvestigation</b>	<b>9</b>
<b>Total Request for Reviews Open and Carried Over Into Next Fiscal Year</b>	<b>24</b>

## **Explanatory Notes**

LECA has the legislative discretion to screen out complaints for the reasons outlined under the PSA and the CSPA.

\*included under both for both CSPA and PSA

### **\*Better Dealt with Under Another Act or Law**

Complaints that should clearly be dealt with by another legal authority (e.g., a complaint about the validity of a traffic ticket for speeding).

### **\*Consolidated Complaint**

The Complaints Director may consolidate two or more complaints, if in his or her opinion, it is appropriate to do so. Administrative consolidation that concern the same incident as another complaint filed by the same individual against the same service. One complaint would remain as the primary complaint, and the other complaints would be closed and consolidated with the primary complaint and added as additional information.

Where multiple complainants file a complaint about the same incident which raise similar issues, the Complaints Director may combine the complaints and cause one investigation or response to be conducted. Unlike an administrative consolidation, this type of consolidation will not result in complaints being closed.

### **\*Duplicate Complaint**

Where a complainant intentionally or unintentionally files a duplicate complaint for the exact same allegations covering the exact same period of time.

### **\*Frivolous**

A complaint that does not reveal any allegation of misconduct or breach of the Code of Conduct, is trivial, or lacks substance or an objective air of reality.

### **\*Informally Resolved**

Informal Resolution is a way to informally resolve complaints and can be attempted at any time during the LECA complaint process. The complainant, the respondent officer and the police chief or OPP Commissioner must all agree.

### **\*Lost Jurisdiction**

Jurisdiction is lost when it is determined that the subject of the complaint or investigation is retired or no longer a sworn member of a municipal police service, NAPS, or the OPP. Similarly, jurisdiction would be lost if it is determined that special constables employed by the Niagara Parks Commission, and peace officers in the Legislative Protective Service, subject of a complaint, have been retired or no longer a member of these institutions.

### **No Jurisdiction Under Section 58(1) (PSA)**

The complaint is not about a policy, service, or the conduct of a police officer. The person whose conduct is complained of does not fall under the jurisdiction of LECA, or the complainant is not someone who is permitted to make a complaint. This section applies to complaints wherein the officer whose conduct is complaint of, resigns.

### **No Jurisdiction Under Section 152 (CSPA)**

The person whose conduct is complained of does not fall under the jurisdiction of LECA. In other words, the complaint is not about the conduct of police officers who are sworn members of police services in Ontario, First Nations police services who have opted into the CSPA NAPS or the OPP, a special constable employed by the Niagara Parks Commission, and a peace officer in the Legislative Protective Service.

### **No Jurisdiction Under Section 154(2) (CSPA)**

The complainant is not someone who is permitted to make a complaint

### **\*Not in the Public Interest**

As outlined in the LECA Rules of Procedure, a broad range of factors are considered when determining whether it would be in the public interest to proceed with an investigation.

Under sections 153 and 158 of the CSPA, the Complaints Director may decide not to investigate a complaint if it is not in the public interest to do so, after considering all relevant circumstances. This includes balancing a range of factors to determine whether an investigation would be in the public interest to do so.

In accordance with Rules 10.9 and 10.10 of LECA Rules of Procedures, the Complaints Director must also consider the public interest when deciding whether a complaint should be screened in for investigation. In addition, it is not in the public interest to screen in a complaint that does not, on its face, disclose a breach of the Act or the Code of Conduct.



### **\*Not in the Public Interest / Guideline 001**

A procedure set out by LECA which provides guidance related to complaints where there are outstanding or ongoing criminal charges, SIU investigations, or other court matters. Under this guideline, complaints may be screened out until the other proceedings are complete. The Guideline allows complainants to resubmit the complaint after proceedings conclude. The Guideline is available on LECA's [website](#).

### **\*Over Six Months and Other Criteria**

The Complaints Director may decide not to deal with a complaint if it is made more than six months after the occurrence of the underlying incident cited in the complaint or when the incident was discovered by the complainant. In determining whether to deal with a complaint older than six months, the Complaints Director must consider:

- whether the complainant is a minor or is under a disability within the meaning of the Accessibility for Ontarians with Disabilities Act, 2005.
- whether the complainant is or was subject to criminal proceedings in respect of the events underlying the complaint; and
- whether, having regard to all the circumstances, it is in the public interest for the complaint to be dealt with.

### **\*Prior to Proclamation**

LECA can only deal with complaints about incidents that happened on or after October 19, 2009.

### **\*Third-Party Criteria Not Met**

The complainant is too remote from the incident. A complainant must fit into one of the categories outlined under section 60(6) of the PSA and section 158(3) of the CSPA.

### **\*Vexatious**

A vexatious complaint may be one that has no merit and was made out of anger or the desire to merely seek retribution. These complaints may lack a reasonable purpose or be made with the intention to harass or annoy. Vexatious complaints may be repetitive (filing the same complaint numerous times after a previous complaint was addressed or filing repeated complaints about the same person).

### **\*Withdrawn Complaints**

If a complaint is withdrawn before the conclusion of any investigation into it, the Complaints Director shall cease to deal with the complaint, including causing any investigation into the complaint to be discontinued. The Complaints Director may, however, continue to deal with a complaint or continue its investigation despite its withdrawal if, in his or her opinion, it is in the public interest to do so. If a complainant wants to withdraw their complaint after a hearing has begun, they must receive consent from the Complaints Director and the police chief or Commissioner; otherwise, the hearing will continue.

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