



**Audit of the Royal Canadian
Mounted Police – appointments
under the *Public Service
Employment Act***

A report by the Public Service
Commission of Canada

May 2008

*All of the audit work in this report was conducted
in accordance with the legislative mandate and audit policies
of the Public Service Commission of Canada*

Table of Contents

Summary	2
Introduction	3
Public service employees are an integral part of the RCMP	4
Safeguarding the PSEA	4
Focus of the audit	5
Observations and recommendations	6
The circumstances under which civilian employees are appointed need to be clarified.	6
Staffing policies are established	7
Hiring managers have access to trained staffing advisors	8
The staffing management framework does not operate effectively	8
Many appointment processes did not comply with the PSEA	11
Most acting appointments did not respect the appointment values.	13
More than three quarters of assessments of selected candidates resulting from acting, non-competitive and non-advertised processes were incomplete or missing	14
Nearly a third of appointments from competitive and advertised appointment processes were non-compliant	15
We found other situations of non-compliance	16
Monitoring is inadequate	17
Human resources planning is weak.	19
Conclusion	20
About the audit	20

Summary

1. The Royal Canadian Mounted Police (RCMP) is Canada's national police force. Its workforce is comprised of both police officers and civilian employees. The RCMP appoints its employees under two different acts: the *Royal Canadian Mounted Police Act* (RCMP Act) and the *Public Service Employment Act* (PSEA). Some 5,000 employees under the PSEA represent approximately 19% of the total workforce of the RCMP.
2. The objective of the audit was to determine the extent to which public service appointments and appointment processes made by the RCMP under the PSEA comply with the Act, other governing authorities and policies, and the instruments of delegation signed with the Public Service Commission (PSC). The audit also sought to determine whether the RCMP has an appropriate management framework, systems and practices in place to manage its staffing.
3. Civilian employees of the RCMP are hired under two different acts: the RCMP Act for civilian members and temporary civilian employees, and the PSEA for public service employees. For decades, the RCMP has debated and studied the need to rationalize its civilian employee categories. The RCMP Act states that "the civilian employees that are necessary for carrying out the functions and duties of the Force shall be appointed or employed under the *Public Service Employment Act*". RCMP officials were unable to demonstrate the existence of objective criteria for determining whether to hire civilian employees under the RCMP Act or the PSEA. The circumstances under which civilian members and temporary civilian employees are appointed pursuant to the RCMP Act should be clarified.
4. We found that the RCMP had designed a staffing management framework for public service appointments that included mandatory appointment policies, an instrument of sub-delegation, defined roles and responsibilities for those involved in the staffing process, and training and support for staffing advisors.
5. However, the framework was not implemented as designed. Responsibility for staffing was sub-delegated to staffing advisors but hiring managers with limited training and knowledge of the appointment values, were in most cases, effectively directing staffing.
6. Organizations are responsible for establishing monitoring systems to detect staffing problems and for taking corrective action. We found that the RCMP had failed to establish an effective monitoring system.
7. The RCMP did not effectively manage its public service staffing activities and, as a result, 86% of appointments resulting from the acting, non-competitive and non-advertised processes that we examined did not comply with the PSEA and related policies or did not respect the appointment values. We are particularly concerned about the excessive use of acting appointments for periods greater than four months. Furthermore, 30% of appointments resulting from competitive and advertised processes either did not comply with the PSEA or did not respect the appointment values.

8. In April 2008, the Commission and the RCMP Commissioner signed a new Appointment Delegation and Accountability Instrument that placed specific conditions regarding the PSC's delegation of staffing authorities to the RCMP Commissioner. These conditions will remain in effect until the PSC is satisfied with the integrity of the RCMP's staffing activities under the PSEA.

Introduction

9. The Royal Canadian Mounted Police (RCMP) was established in 1873 and is Canada's national police service. It is headed by the Commissioner, who reports to the Minister of Public Safety.
10. The RCMP is organized under the *Royal Canadian Mounted Police Act*. Its mandate is "to enforce laws, prevent crime, and maintain peace, order and security in Canada and for all Canadians, and to protect Canadians and foreign dignitaries in Canada and abroad" (*Royal Canadian Mounted Police Departmental Performance Report for the period ending March 31, 2007*). Through agreements between the federal government and other bodies, the RCMP provides national, provincial/territorial, Aboriginal and municipal policing services across Canada.
11. The RCMP is also subject to the same laws governing other federal departments and agencies, including the *Financial Administration Act*, the *Public Service Labour Relations Act*, the *Official Languages Act*, the *Employment Equity Act*, the *Canada Labour Code* and, in the case of its public service employees, the *Public Service Employment Act* (PSEA).
12. As of January 2007, the RCMP had over 27,000 employees, in three categories:
 - Regular members are police officers (17,000 employees).
 - Civilian members are hired for their specialized scientific, administrative or technical skills. They provide support to front-line policing operations (3,000 employees). The RCMP also employs temporary civilian employees, who perform a range of functions under contracts with a fixed duration (2,000 employees).
 - Employees appointed under the PSEA (hereafter referred to as public service employees) perform non-policing duties, such as administrative functions or support for policing operations (5,000 employees).
13. The RCMP is organized into four regions, 14 divisions, National Headquarters in Ottawa, and the training academy or "Depot" in Regina, Saskatchewan. Regular members, civilian members, public service employees, temporary civilian employees, municipal employees and volunteers work together in 750 detachments across Canada.

Public service employees are an integral part of the RCMP

14. Public service employees represent approximately 19% of the total workforce of the RCMP. Although their numbers are heavily concentrated at Headquarters, they work throughout the organization. They are also fully integrated into the structure, with many of them reporting to, or being supervised by, regular or civilian members of the RCMP.
15. Some public service employees in the RCMP provide the same type of corporate and administrative services found in any federal government organization, such as human resources, financial management, purchasing, clerical and secretarial services, and information management.
16. Other public service employees perform work more directly related to police operations. These individuals possess knowledge and experience specific to police services. For example, detachment clerks make up the second-largest group of public service employees in the RCMP. To support police work, they maintain vital records systems, perform court-related duties, respond to inquiries from the public, and operate radio equipment to relay emergency information to police officers.

Exhibit 1: Detachment clerks – Duties

Detachment clerks face tight deadlines, time pressures, frequent interruptions, conflicting priorities and multiple demands from staff, callers and visitors. They may be exposed to intoxicated, mentally unstable, hostile and potentially violent individuals. They sometimes work alone in the detachment when regular members are on patrol or responding to calls.

Source: RCMP, Work Description for a CR-04 Detachment Clerk

17. Still other public service employees work with sensitive data – for example, at the National Criminal Data Bank, the Violent Crime Linkage Analysis System, and the Canadian Police Information Centre.

Safeguarding the PSEA

18. The PSEA provides the statutory basis for a merit-based, non-partisan public service that is professional, representative of Canada's diversity and able to serve Canadians with integrity and in their official language of choice. The preamble of the Act articulates the core appointment values of merit and non-partisanship, and highlights the guiding values of fairness, transparency, access and representativeness in staffing.
19. The Public Service Commission (PSC) is responsible for the administration of the PSEA. The Act gives the PSC exclusive authority to make appointments to and within the public service, based on merit. It further allows the PSC to delegate its authority for making appointments to departmental and agency deputy heads. Delegation allows an organization to manage its own staffing and recruitment needs in the most efficient and effective manner. It also allows the organization to establish staffing processes according to its particular needs: managers can initiate and approve actions within their own areas of responsibility, in accordance with sub-delegated authorities. Deputy heads are accountable for adhering to the conditions of their signed instrument of delegation.

20. The PSC's annual monitoring activities identified appointments under the Act at the RCMP as a risk area. In particular, the PSC identified the department's system of governance for staffing as an area of significant risk and decided in 2005 to conduct an audit of the RCMP.
21. The RCMP was in the news during the period of the audit. The Commission of Inquiry into the Actions of Canadian Officials in Relation to Maher Arar (the Arar Commission) and the resignation of the Commissioner in December 2006 have been the subject of public interest. Allegations related to RCMP pension plan and insurance matters prompted an internal audit, an internal investigation, an Ottawa Police Services investigation, an audit by the Office of the Auditor General, parliamentary committee hearings, and the appointment of an independent investigator. The investigator issued a report in June 2007, calling for immediate action by the RCMP to address issues related to its management, culture and governance. A new Commissioner, the first civilian in the Force's history, was appointed in July 2007.
22. Moreover, the Government of Canada established a Task Force to closely examine serious issues related to the RCMP's culture and governance. In its report, released on December 14, 2007, the Task Force on Governance and Cultural Change recommended fundamental changes to the structure and governance of the RCMP.

Focus of the audit

23. The objectives of the audit were to determine whether:
- the RCMP has an appropriate framework, systems and practices in place to manage its public service staffing activities; and
 - public service appointments and appointment processes comply with the PSEA and other governing authorities, and policies, and with the instruments of delegation signed with the PSC.
24. The audit covered the period from April 1, 2005, to December 31, 2007. We examined a sample of 204 appointments drawn from across Canada. The appointments included acting situations for periods greater than four months, non-competitive/non-advertised appointments, closed/internal appointments and open/external appointments. The sample included 184 appointments made under the previous PSEA and 20 made under the current legislation.
25. We analyzed documents related to the human resources management of public service employees in the RCMP. We conducted interviews in the National Capital Region as well as other regions, with RCMP managers and staff (regular and civilian members, and public service employees), public service staffing advisors, and bargaining agent and staff association representatives. For more information, refer to the **About the audit** section at the end of this report.

Observations and recommendations

The circumstances under which civilian employees are appointed need to be clarified

26. Civilian employees of the Royal Canadian Mounted Police (RCMP) are hired under two different acts: the *Royal Canadian Mounted Police Act* (RCMP Act) for civilian members and temporary civilian employees, and the *Public Service Employment Act* (PSEA) for public service employees.
27. With civilian members and public service employees hired under two separate employment jurisdictions, the RCMP has created two human resources management frameworks. Each has a set of standards, processes and systems in such areas as classification, staffing, staff relations, compensation, training, career planning and performance review. However, RCMP officials were unable to demonstrate the existence of objective criteria for determining whether to hire civilian employees under the RCMP Act or the PSEA.
28. For decades, the RCMP has debated and studied the need to rationalize its civilian employee categories. However, it has made slow and inconsistent progress in rationalizing the two categories. In June 2003, the RCMP informed the Solicitor General that all civilian members would be converted to public service employees. The RCMP Senior Executive Committee recognized at the time that a conversion of civilian members to public service employees under the PSEA was the best decision. In its rationale provided to the Solicitor General, the RCMP said the decision:
 - is aligned to the federal government human resources management framework;
 - allows for better integration with our federal partners;
 - facilitates mobility within the greater public service; and
 - offers better pension portability for civilian employees.
29. This decision is consistent with section 10 (1) of the RCMP Act, which states that “the civilian employees that are necessary for carrying out the functions and duties of the Force shall be appointed or employed under the *Public Service Employment Act*.”
30. The RCMP communicated this decision to all its employees in June 2003. At that time, the Senior Executive Committee was aware that some civilian members had voiced their opposition and it expected that more civilian members would do so. In 2004, the Senior Executive Committee reversed its decision to eliminate the civilian member category, but not because of any legislative impediment.

31. In our opinion, the rationale provided by the RCMP to the Solicitor General for converting all civilian members to public service employees under the PSEA, continues to be relevant today.

Recommendation 1

The RCMP should appoint its civilian employees under the PSEA and clarify the circumstances under which civilian members and temporary civilian employees are appointed pursuant to the RCMP Act.

RCMP response. *The RCMP agrees to re-examine the appointment of civilian employees under the PSEA and will clarify the circumstances under which civilian members and temporary civilian employees are appointed pursuant to the RCMP Act. The issue of civilian employees, including civilian members and temporary civilian employees within the RCMP, was also examined recently by the Task Force on Governance and Cultural Change in the RCMP “Rebuilding the Trust” (Task Force). The circumstances under which civilians employees are appointed require clarification. The RCMP Change Management Team is currently charged with examining this issue in the broader context of the Task Force report. Any decisions on civilian employees must be made within the context of a rigorous and comprehensive study such as the one currently underway to address the Task Force recommendations.*

Staffing policies are established

32. The RCMP established a Public Service Policy and Programmes Section (the Centre). Its mandate is as follows:
- to be the centre of expertise for public service recruitment and staffing matters;
 - to support the public service recruitment and staffing communities in the delivery of services to their clients; and
 - to influence legislative and regulatory direction.
33. We found that the Centre put in place the appointment policies that are mandatory under the PSEA. We found approved policies for area of selection (including national area of selection); revocation and corrective action; and the criteria for choosing non-advertised processes. Policies were developed through consultation with staffing advisors, unions and the Public Service Commission (PSC). The policies meet the requirements established by the PSC and are widely accessible to employees through the corporate intranet.
34. The Centre has developed additional appointment-related policies, including directives on the administration of oaths and affirmations, advertisements and notification of appointments, and informal discussion.

Hiring managers have access to trained staffing advisors

35. We found that hiring managers and sub-delegated staffing advisors in all RCMP regions had access to a staffing advisor whose knowledge had been validated by the PSC. We noted that almost 85% of the RCMP's 41 advisors had had their knowledge validated through successful completion of the PSC Appointment Framework Knowledge Test as of December 2006. In addition, we found that the staffing community had access to staffing advisors at the Centre.
36. We also noted that the Centre was in the process of revamping its staffing certification program. However, the Centre was awaiting guidance from the National Staffing Council – a public service forum for chiefs of staffing that is developing minimum requirements for certification – before formally implementing the certification program.
37. The Centre has published standard staffing checklists to support the administration of the staffing process and compliance with appointment policies. The checklists outlined key steps for employee reclassifications, acting opportunities, non-advertised appointments from outside the public service, and internal and external processes. The checklists were distributed across the organization and were accessible to staffing advisors. Overall, we are satisfied with the Centre's efforts to support the RCMP's staffing advisors.
38. The majority of the hiring managers we interviewed indicated that they were satisfied with the quality of advice received from their staffing advisors.

The staffing management framework does not operate effectively

39. Appointment and appointment-related authorities for public service staffing are delegated to the RCMP Commissioner in the Appointment Delegation and Accountability Instrument (ADAI), which is the instrument of delegation signed by the Commissioner and the President of the PSC. The PSC encourages deputy heads to sub-delegate these authorities. Those to whom this appointment authority is sub-delegated must exercise it within a framework that ensures that they are accountable for its proper use to the PSC which, in turn, is accountable to Parliament.
40. Under the instrument of delegation, the RCMP is required to put in place its own staffing management framework, based on the PSC's Staffing Management Accountability Framework (SMAF). The SMAF sets out expectations for a well-managed appointment system designed to ensure the integrity of staffing activities.
41. In January 2006, the RCMP formalized its Public Service Staffing Framework (Framework), which sets out the RCMP Commissioner's expectations for effective management of the staffing system for public service positions. The RCMP governance structure set out in the Framework is designed to ensure that hiring managers and staffing advisors carry out their staffing responsibilities effectively and in conformity with all statutory, central agency and departmental requirements. The Framework establishes roles and responsibilities, as described in Exhibit 2.

Exhibit 2: RCMP Public Service Staffing Framework – Roles and Responsibilities		
Position	Accountability relationship (HR context)	Summary of major public service staffing responsibilities
Commissioner	Deputy head	Delegation – Full delegation of appointment and appointment-related authorities. Management of the system.
Corporate Human Resources Management Responsibilities		
The Chief Human Resources Officer (Deputy Commissioner)	Reports directly to the Commissioner	Sub-Delegation – None Monitoring – Ensures the staffing system complies with statutory requirements and central agency policies.
Officer in Charge Public Service Policy and Programmes Section (the Centre)	Three reporting levels exist between this position and the Chief of Human Resources Officer (Deputy Commissioner)	Sub-Delegation – Appointment and appointment-related authorities with the exception of those that must be retained at the deputy head level. Enabling Infrastructure and Monitoring – Ensures staffing structures, systems and processes are in place for the exercise of staffing authorities; develops and communicates programs, policies and guidelines; establishes and implements ongoing monitoring strategies; and provides training and development to staffing advisors.
Regional Human Resources Management		
Regional Human Resources Officers	Two reporting levels exist between this position and the Commissioner	Sub-Delegation – None Monitoring – Ensures the staffing system complies with statutory requirements and central agency policies.
Staffing Advisors	Two reporting levels exist between this position and the Regional Human Resources Officer	Sub-Delegation – Appointment and appointment-related authorities with the exception of those that must be retained at the deputy head level. Advice and Administration – Provide expert advice to managers regarding the staffing framework; provide advice to managers on policy matters including the application of the staffing values and principles; and ensure proper documentation and accessibility of staffing actions.
Hiring Managers		
Managers	Various; positions are more senior than the Staffing Advisors	Sub-Delegation – None Consult and Staff – Consult with staffing advisors; develop and communicate staffing plans; establish merit criteria; decide on selection process; conduct assessment and selection of candidates; and provide employees with opportunity for informal discussion of staffing decisions and document staffing decisions.

Source: RCMP's Public Service Staffing Framework

42. Most RCMP managers are regular or civilian members hired under the RCMP Act. As shown in Exhibit 2, the RCMP decided not to sub-delegate staffing authorities to managers. The rationale provided in the framework is as follows:
- the increase in administrative workload could negatively affect a manager’s ability to meet policing requirements;
 - managers have traditionally expressed a great deal of concern about running policing operations while, at the same time, meeting the administrative requirements of two separate and distinct sets of legislation, policies and processes;
 - managers face regular transfers and rotations and hence do not stay in the same position for an extended time; and
 - the learning curve would be significant, given the requirement to apply two distinct Acts, policies and processes.
43. The Framework assigned hiring managers the responsibility for staffing decisions and staffing advisors the appointment and appointment-related authorities through sub-delegation, as can be seen in Exhibit 2. The Framework acknowledges this joint responsibility:

Managers, who are directly involved in the selection process and who ultimately make staffing decisions, exercise this responsibility **only** with the expert advice of the certified staffing advisor(s). As such, managers and certified staffing advisors are both responsible and accountable for all staffing decisions under their responsibility.

44. We found that the Framework did not function as designed. Staffing advisors and employees of the Centre found themselves under considerable pressure from regular and civilian hiring managers. Hiring managers who disagreed with their advice often bypassed them by seeking approval higher up the chain of command. When asked why staffing advisors signed letters of offer when the appointment process did not respect the PSEA appointment values, the Centre’s response was that advisors felt pressured to maintain good working relations with hiring managers.
45. The Framework was designed for hiring managers to rely on the expert advice of the staffing advisor. Thus, for staffing activities to be managed effectively, we would have expected hiring managers to have a general knowledge of the PSEA appointment values that ensures staffing decisions respect merit, non-partisanship, access, fairness, transparency and representativeness. However, the responsibility for participation in learning events to maintain staffing expertise was limited to staffing advisors.

46. We found that hiring managers had access to staffing information through departmental and central agency Web sites, e-mails, bulletins and publications distributed to all staff. The RCMP also developed a guide for employees entitled “Guide to Public Service Staffing – New Public Service Employment Act – What you need to know.” However, many of the hiring managers we interviewed did not make regular use of these information sources, preferring instead to rely on their staffing advisor. Hiring managers were also offered the opportunity to attend staffing information sessions along with other employees, but were not required to do so.
47. Given that one essential element of the Framework was joint decision-making between hiring managers and staffing advisors, its effectiveness relied on the strength of monitoring to ensure the integrity of staffing. As shown in Exhibit 2, this responsibility was assigned to the Chief Human Resources Officer (who reports to the Commissioner) and the regional human resources officers (who report to a deputy commissioner). As described later in this report, the RCMP failed to establish and implement an effective monitoring system.

Recommendation 2

The RCMP Commissioner must establish and implement an effective staffing management framework; ensure that all individuals involved in the staffing process receive appropriate training to carry out their assigned responsibilities and are held accountable.

RCMP response. The RCMP agrees to establish and implement an effective staffing management framework; ensure all individuals receive the appropriate training to carry out their assigned responsibilities and hold them to account. This includes an immediate review of sub-delegations within the organization. A working group will be established to examine the feasibility of revising the sub-delegation of public service appointment authorities. The RCMP will review its Public Service Staffing Framework as well as the Staffing Management Accountability Framework.

Many appointment processes did not comply with the PSEA

48. We expected each appointment process at the RCMP to comply with the PSEA and the Appointment Delegation and Accountability Instrument (ADAI) signed with the PSC. We further expected each appointment to respect the core values of merit and non-partisanship, and the guiding values of fairness, access, transparency and representativeness.
49. We examined 204 appointments resulting from 198 processes conducted by the RCMP (Table 1) under both the previous PSEA and the current Act. We reviewed 118 acting, non-competitive and non-advertised processes, including 66 acting appointments and 33 reclassifications. We also reviewed 86 appointments resulting from competitive and advertised processes.

Table 1: Overview of audited files

Appointments and type of process	Number of processes	Number of appointments	% of unsatisfactory appointments
Acting, non-competitive and non-advertised			
Acting (over four months)	66	66	91%
Reclassification	33	33	88%
Other non-competitive and non-advertised	19	19	60%
Subtotal	118	118	86%
Competitive and advertised			
Open competition / External advertised	43	49	38%
Closed competition / Internal advertised	37	37	22%
Subtotal	80	86	30%
Total	198	204	

Source: Audit, Evaluation and Studies Branch, Public Service Commission

50. We found that 86% of the appointments resulting from acting, non-competitive and non-advertised processes either did not comply with the PSEA and related policies, or did not respect the appointment values. The rate of non-compliance was 30% for appointments resulting from competitive and advertised processes. We reviewed compliance on key matters related to the appointment values, including area of selection, candidate screening, assessment and selection, and the requirement to support and document key staffing decisions.

Most acting appointments did not respect the appointment values

51. Of all the types of processes, we are especially concerned about acting appointments for periods greater than four months. We found that 91% of the 66 acting appointments we reviewed did not respect the appointment values of fairness, access and transparency.
52. An acting appointment is the temporary performance of the duties of another position by an employee if the performance of those duties would have constituted a promotion had the employee been appointed to the position. Acting appointments are intended to provide managers with the flexibility to deal with short-term operational needs, such as maternity/parental leave, illness, language training or the need to maintain operations while staffing a vacant position.
53. Acting appointments for periods greater than four months may raise concerns about fairness. An opportunity to act in a position gives an employee an advantage not available to other potential candidates. A statistical study published by the PSC in July 2007 found that the rate of promotion was significantly higher for employees who had held acting appointments than the rate for non-acting employees (41% versus 6%). Hiring managers have a responsibility to use acting appointments appropriately as temporary staffing measures and to ensure that acting appointments for periods greater than four months respect the appointment values.
54. In our review of RCMP files, we found acting appointments of significant duration. On average, acting situations were extended twice and lasted nearly 16 months. We found nine situations in which acting appointments were extended four or more times, and in one of these cases the appointment was extended eight times. Two of the nine situations lasted 44 months or more.
55. In most cases, we found that acting opportunities for periods greater than four months were not made accessible to potential candidates. Only six of the 66 acting opportunities were advertised. Furthermore, in 47 out of 60 appointments, there was insufficient evidence that more than one candidate had been considered for the acting appointment.

Exhibit 3: Appointments that compromised appointment values

A long-term acting appointment: The hiring manager offered a project leader a two-year acting appointment as a manager responsible for a staff of 14 public service employees. The appointment was extended after two years and ultimately totalled 44 months. The assessment on file does not demonstrate how the candidate met all the qualifications for the position; the file contains no résumé. We found no evidence to indicate that other employees were considered, even though there were four other public service employees at the same substantive level, in the same division, as the candidate selected.

An acting appointment opportunity with no consideration of other employees: A manager offered an administrative clerk a one-year acting appointment as a security analyst for professional development purposes. The appointment was later extended for a second year. The candidate did not meet the language requirements at the time of the first appointment. We found no evidence on file that other potential candidates were considered for this developmental opportunity. We also found that the other qualifications of the selected candidate were minimally assessed. Although the manager intended to eventually advertise the opportunity, the manager first wanted to provide the candidate with more time to continue formal studies and gain job experience.

Source: Audit, Evaluation and Studies Branch, Public Service Commission

More than three quarters of assessments of selected candidates resulting from acting, non-competitive and non-advertised processes were incomplete or missing

56. We are also concerned about the assessments used to appoint selected candidates in acting, non-competitive and non-advertised processes. The selected candidate for such appointments has to meet all of the essential qualifications for the position. For this purpose, the candidate's qualifications are assessed in writing against a statement of qualifications or statement of merit criteria, based on the work description for such positions. The written assessment demonstrates that the employee meets the essential qualifications to perform the duties and that the appointment is therefore merit-based.
57. More than three quarters (78%) of the 118 appointments resulting from acting, non-competitive and non-advertised processes had inadequate assessments. The hiring manager either indicated that the candidate had met all the job requirements, or did not provide examples to support this overall assessment. We found eight appointments without assessments on file.
58. When a position is reclassified, the responsible manager is required to assess the incumbent's qualifications against the statement of qualifications or statement of merit criteria, as is the case with other non-competitive or non-advertised appointments. We found that assessments for 29 out of 33 reclassifications were inadequate.

Nearly a third of appointments from competitive and advertised appointment processes were non-compliant

59. We found 30% of appointments resulting from competitive and advertised processes either did not comply with the PSEA, related policies, or did not respect the appointment values. Among these, we found evidence of tailoring of statements of qualification, inadequate screening, inadequate assessment tools, inadequate or incomplete assessments, and two situations with restricted areas of selection.

Exhibit 4: Examples of non-compliant competitive and advertised appointments

Tailored statement of qualifications: For an open competition to staff an assistant position, the manager identified qualifications that matched the successful candidate's résumé. Some of the experience requirements were not consistent with the job requirements. There were 40 applicants for the position. The successful candidate, who had previous work experience at the RCMP as a temporary civilian employee, was the only applicant screened in and found qualified.

Unsupported screening: In an external advertised process, we found no screening board report and no indication to explain why 10 out of 34 candidates were screened in. We could not determine from the staffing file why some candidates had been eliminated from the appointment selection process at the screening stage. This approach hinders equal access to employment opportunities for the Canadian public.

Not all advertised qualifications were assessed: In the case of two processes we reviewed, there was no evidence that qualifications were assessed for any of the candidates and we did not find any correspondence from the selection board members explaining the omission. In the first case, a closed competition in 2005 referred to two personal suitability criteria that were not assessed. In the second case, an internal advertised process in 2006 did not demonstrate how two of the essential qualifications were assessed for any of the candidates. We were therefore unable to determine whether any candidate met all of the qualifications for the position. This practice potentially restricted the pool of applicants. Some people may not have applied because they lacked qualifications that ultimately were not assessed.

Source: Audit, Evaluation and Studies Branch, Public Service Commission

We found other situations of non-compliance

60. **Appointments without a priority clearance number:** We found that three appointments were made without a priority clearance number. The PSEA requires that employees of the federal public service – including surplus employees and those who have been laid off – be given priority consideration for appointment in or to the public service, without competition, provided they meet the requirements for the job. A department or agency must obtain a priority clearance number from the PSC before making an appointment; this requirement ensures that employees with priority entitlements have been considered.
61. **Unauthorized appointments:** We found four letters of offer for appointments signed by officials who did not have the sub-delegated authority to sign such letters. Such appointments do not respect the conditions of the instrument of delegation.
62. **Suspicious candidate assessment:** We found one appointment where the selected candidate was required to write an exam as part of a competitive process. The answers given by the candidate to the knowledge questions were, for the most part, identical to the expected answers – in some cases, matching word for word.
63. **Missing documentation:** We found that 50% of the staffing files we examined were missing key information to support the appointment decision. The missing documentation included job posters, assessments, priority clearance numbers and screening information.

Recommendation 3

The RCMP Commissioner must take action to ensure that staffing decisions respect merit and the appointment values of fairness, transparency, access and representativeness.

***RCMP response.** The RCMP agrees staffing decisions must respect merit and the appointment values of fairness, transparency, access and representativeness. To assist in this area a staffing checklist was developed. The checklists were forwarded to staffing advisors across Canada and are also posted on the PS Policy & Programs Section's website. The RCMP recognizes further progress can be made in this area through increased training and through the development of a more robust monitoring program of RCMP public service staffing. The RCMP will also establish an action plan based on the audit recommendations so staffing decisions respect both the merit principle and the staffing values identified in the preamble of the Public Service Employment Act (PSEA).*

Monitoring is inadequate

64. We expected to find a monitoring and reporting strategy, in accordance with the requirements of the PSC's Staffing Management Accountability Framework (SMAF). The Commissioner is expected to implement measures demonstrating that the organization meets specified indicators, and to monitor staffing activities on a continuing basis. A good monitoring system allows organizations to detect deficiencies and correct them promptly. In addition, such a system is dependent on accurate information.
65. The RCMP started a monitoring and reporting program in January 2006. Roles and responsibilities are shared among the Centre, staffing advisors and managers. The objectives of the RCMP's program are to ensure that:
 - the PSC's and the RCMP Commissioner's delegated authorities are being exercised in accordance with statutory and central agency requirements;
 - policies, practices and programs are achieving their intended results;
 - performance standards, measurements and risk assessment processes are in place; and
 - the program incorporates the need for timely reporting to the PSC and other central agencies.
66. We found that the Centre identified a number of potential staffing risks, including those outlined in the SMAF, as well as risks identified by the RCMP associated with the organization and appointment values. The Centre identified long-term acting appointments and the use of non-advertised appointments as specific risks to be monitored.
67. Although the program was defined, only one employee at the Centre was subsequently dedicated, on a part-time basis, to monitoring staffing activities. We found that these resources were insufficient to carry out all of the activities of a monitoring program.
68. Effective monitoring is dependent on accurate reporting of staffing activities and the public service population. The monitoring program relies on the Human Resources Management Information System (HRMIS) as one of several data sources. However, a Human Resources Sector budget review in 2005 noted that the functionality of HRMIS is not being maximized, and that the leveraging of technology and strategic information management was limited.
69. In addition to the problem of limited functionality, the RCMP had identified data integrity issues in HRMIS. An RCMP report for the Human Resources Sector in 2007 states that HRMIS was isolated from other useful information sources, contained dated or suspect data, and was not used to its full advantage.

70. We did not find monitoring reports that assessed staffing performance against planned staffing objectives or that assessed reporting against the monitoring program's established list of risk indicators. Many staffing advisors we interviewed in the regions said that they did not receive monitoring reports back from the Centre to help them plan and monitor their own public service staffing. Instead, advisors maintained their own staffing logs for operational purposes. In addition, hiring managers said that they did not receive monitoring reports to guide their staffing decisions.
71. We found that the Centre developed staffing file checklists for various staffing processes as a means to facilitate compliance with the PSEA and ensure that documentation was on file. These checklists were provided to staffing advisors at their training session in December 2005. The Centre asked regions to regularly send it the completed checklists so that it could monitor their staffing activities. The checklists have recently been updated.
72. In summary, the RCMP's monitoring system was ill equipped to identify problems and allow for corrective measures on a timely basis. The system lacked an active monitoring framework for staffing risks and it used unreliable information from an information system that did not deliver essential staffing reports to management. Consequently, those responsible for monitoring were unable to identify appointments that did not comply with the PSEA. Without access to reliable and timely information, it is also difficult for hiring managers and staffing advisors to identify – much less plan for – impending vacancies and situations that are inconsistent with appointment values, such as, acting situations for periods greater than four months.

Recommendation 4

The RCMP Commissioner must implement a monitoring system that will assess progress achieved on the basis of planned results and actively monitor areas at risk, and take corrective action where necessary.

***RCMP response.** The RCMP agrees to implement a monitoring system that will assess progress achieved on the basis of planned results and will actively monitor areas at risk, taking corrective action where necessary. The RCMP agrees the resources currently allocated to this endeavour are limited and has taken action to remedy this situation. The RCMP has determined monitoring exercises for this fiscal year will focus on acting appointments and the use of a contingent workforce.*

Human resources planning is weak

73. Given the supporting role of public servants in RCMP operations, we expected that a corporate human resources plan for the public service workforce would be integrated with the RCMP business plan. Planning is a key component of a staffing framework. At a minimum, we expected the Commissioner to have identified the organization's current and future human resources needs for public service employee positions, including impending vacancies. We expected to find proposed courses of action to fill the vacancies. Moreover, we expected to find that staffing processes for key positions throughout the RCMP public service population would be consistent with this plan.
74. We did not find a corporate human resources plan for public service employees. RCMP planning documents in the last three years have stated an intention to implement integrated human resources planning for all employees, including public service employees. Despite evidence of planning for regular and civilian members, neither the 2005-2006 or 2006-2007 business plans for the Human Resources Sector put enough emphasis on public service employees.
75. We found some evidence of planning tools at an operational level. These documents address basic considerations, such as strategic objectives and goals; a description of positions; current, future and ongoing challenges related to staffing; areas of difficulty and attempted solutions; staffing processes under way; potential retirements; and staffing needs ranked in order of priority. These tools have been shared with staffing advisors through the corporate intranet. The tools are intended to guide hiring managers in planning their staffing activities to meet their current and future needs.
76. However, we found little evidence that these initiatives were having an impact outside of Headquarters. Some hiring managers and staffing advisors we interviewed said that the exercise was useful; others regarded it as simply another administrative step in staffing.
77. The absence of a corporate human resources plan for public service employees means that there are neither national staffing objectives nor a coordinated staffing strategy to fill vacancies in critical positions, such as those of detachment clerks across the country.

Recommendation 5

The RCMP Commissioner must establish and implement human resource planning for its public service employees that is integrated with the RCMP's business plans.

RCMP response. *The RCMP agrees to establish and implement human resource planning for its public service employees that is integrated with the RCMP's business plans. The RCMP has undertaken significant research into workforce planning practices. It has developed some initial tools to guide discussions and decision-making with regards to how workforce planning could be implemented in the RCMP.*

Conclusion

78. Immediate attention must be paid to the staffing practices of the Royal Canadian Mounted Police (RCMP). Our work has shown that, in the period covered by our audit, many public service staffing activities did not comply with the *Public Service Employment Act* (PSEA) and other governing authorities and policies, or with the instruments of delegation signed with the Public Service Commission (PSC).
79. Our examination of 204 appointments revealed that 86% of acting, non-competitive and non-advertised appointments and 30% of appointments resulting from competitive and advertised processes either did not comply with the PSEA and related policies or did not respect the appointment values. We are particularly concerned about the excessive use of acting appointments for periods greater than four months. We also found that many assessments of selected candidates were incomplete or missing.
80. We found that the RCMP had a staffing management framework to manage its public service staffing activities. However, this framework did not operate effectively. In addition, the RCMP has yet to implement an effective monitoring system and human resources planning is weak.
81. We also found that RCMP officials were unable to demonstrate the existence of objective criteria for determining whether to hire civilian employees under the RCMP Act or the PSEA.
82. In April 2008, the Commission and the RCMP Commissioner signed a new Appointment Delegation and Accountability Instrument that placed specific conditions regarding the PSC's delegation of staffing authorities to the RCMP Commissioner. These conditions will remain in effect until the PSC is satisfied with the integrity of the RCMP's staffing activities under the PSEA.

About the audit

Objectives

The objectives of the audit were to determine whether:

- the Royal Canadian Mounted Police (RCMP) has an appropriate framework, systems, and practices in place to manage its public service staffing activities; and
- public service appointments and appointment processes comply with the *Public Service Employment Act* (PSEA) and other governing authorities and policies, and with the instruments of delegation signed with the Public Service Commission (PSC).

Scope and approach

The audit covered the period from April 1, 2005, to December 31, 2007. We examined a sample of 204 appointments drawn from across Canada. The appointments included acting situations for periods greater than four months, non-competitive/non-advertised appointments, closed/internal appointments and open/external appointments. The sample included 184 appointments made under the previous PSEA and 20 made under the current legislation.

We analyzed documents related to the human resources management of public service employees in the RCMP. We conducted interviews in the National Capital Region as well as other regions, with RCMP managers and staff (regular and civilian members, and public service employees), public service staffing advisors, and bargaining agent and staff association representatives.

Criteria

We drew the following audit criteria from the Staffing Management Accountability Framework (SMAF), as well as the Appointment Delegation and Accountability Instrument (ADAI) signed by the Commissioner of the RCMP and the Commission. We expected that the RCMP would have:

- undertaken human resources planning that links with its strategic and operational objectives;
- clearly articulated and published mandatory departmental policies that guide managers and human resources advisors in staffing;
- granted written sub-delegation of appointment authorities to the managers and human resources advisors who will be exercising these authorities;
- provided sub-delegated managers and human resources advisors access to the necessary values-based training;
- clearly defined and implemented roles, responsibilities and accountability for staffing decisions;
- validated the knowledge of human resources advisors who provide appropriate advice, guidance and support to managers;
- provided employees with timely access to staffing information;
- put in place monitoring and reporting systems that assess staffing strategies, programs and results against expectations, and are used to improve staffing; and
- ensured that staffing activities are compliant with relevant authorities, respect the appointment values, and are supported by sufficient, appropriate documentation.

Audit team

Vice-President, Audit, Evaluation and Studies Branch:
Mary Clennett

Director General, Departmental Audits Directorate:
Dena Palamedes

Director, Departmental Audits Directorate:
Denise Coudry-Batalla

Audit Managers:
John Corbeil
Holly Shipton

Auditors:
Lucie Amyotte
André Bergeron
Dominique Charlebois
Jill Hawkins
Marianne Jacques
Lauren Jeffs
Lise Lanthier
Manon LeBrun
Claudia Lozano
Micheline Newberry
Christopher Wilson