

RCMP-GRC



ROYAL CANADIAN MOUNTED POLICE • GENDARMERIE ROYALE DU CANADA

Canada Firearms Centre (CAFC) Management Control Framework (MCF) Audit

Final Report

May 2010

Internal Audit

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The term adequate is defined on page 7 of this report.

Final Report - May 2010

Executive Summary

The Canada Firearms Centre (CAFC) was created in 1996 to oversee the administration of the *Firearms Act* and the Canadian Firearms Program (CFP). The CFP's objective is to help reduce firearms-related death, injury and crime and to promote public safety through universal licensing of firearms owners and registration of firearms in Canada. Delivering the CFP depends on a partnership involving the federal government, provincial governments and law enforcement agencies. In 2003, it was established as a standalone agency within the portfolio of Public Safety. On May 17, 2006 responsibility for the CFP was transferred to the Royal Canadian Mounted Police (RCMP).

In June 2007, the RCMP's Audit and Evaluation Committee approved an audit of the CAFC Management Control Framework (MCF) as part of the Risk-Based Internal Audit Plan for the period from April 2007 to March 2009. As per the terms of reference for this audit, signed by the Chief Audit Executive and the Deputy Commissioner, National Police Services, the objectives of this internal audit were to provide reasonable assurance that the CAFC MCF is adequate and effective to support its activities, and that the CAFC operational processes are designed and conducted in a manner consistent with the *Firearms Act* and related regulations.

Operational processes were reviewed in federal Chief Firearms Officer (CFO) offices. The engagement did not examine operational processes in provincial CFO offices since they are bound to the CAFC through separate contribution agreements. The engagement did not review processes performed at the CAFC's Central Processing Site, including the enhanced screening process. The Firearms Support Services Directorate, which was aligned with the CAFC to form an integrated CFP in June 2008, was not examined in this engagement.

The audit found that CAFC demonstrated strengths in several areas:

- change management - CAFC transition to the RCMP
- performance management regime
- collaborative initiatives and relationships with CAFC partners
- accountability, authority, roles and responsibilities defined and communicated
- monitoring external and internal environments
- facilitating access to CAFC services.

In our opinion, overall, the CAFC management control framework in place was adequate and effective to support its activities.

Areas requiring management action are:

- risk management plan
- service standards in CFO offices.

The term adequate is defined on page 7 of this report.

Several of the CAFC operational processes examined were consistent with the *Firearms Act* and related regulations. These were:

- administration of required firearms safety courses and tests
- design and conduct of the firearms registration process
- design and conduct of the authorizations to transport and authorizations to carry process
- checking continuous eligibility of licence holders
- design of the business and carrier licences process.

Areas requiring management action are:

- processes to issue business licences
- processes to approve shooting clubs and shooting ranges.

1. Background

The Canada Firearms Centre (CAFC) was created in 1996 to oversee the administration of the *Firearms Act* and the Canadian Firearms Program (CFP). In 2003, it was established as a standalone agency within the portfolio of Public Safety.

The CFP's objective is to help reduce firearms-related death, injury and crime and to promote public safety through universal licensing of firearms owners and registration of firearms in Canada. The delivery of the CFP depends upon a partnership involving the federal government, provincial governments and law enforcement agencies. The CFP also relies on federal partners, such as the Canada Border Services Agency (CBSA) and the Department of Foreign Affairs and International Trade.

On May 17, 2006, responsibility for the CFP was transferred to the Royal Canadian Mounted Police (RCMP). The RCMP is responsible for overseeing the day-to-day activities of the Program as well as for financial and performance reporting to Parliament. On June 16, 2008, the CAFC and the Firearms Support Services Directorate, comprising the National Weapons Enforcement Team, the Canadian National Firearms Tracing Centre, the Tactical Analysis Unit and the Firearms Reference Table were aligned to form the integrated CFP. The Director General (DG) of the CFP reports to the Deputy Commissioner (D/Commr), Policing Support Services (PSS).

CAFC headquarters are in Ottawa and its Central Processing Site (CPS) is located in Miramichi, New Brunswick. CPS, the national data processing and call centre site, processes licence and registration applications. There is a Chief Firearms Officer (CFO) for each province and territory. CFOs are responsible for decision-making and administrative work related to licences, authorizations to transport and authorizations to carry, and transfers of firearms by individuals and businesses.

The CFOs in British Columbia and Yukon, Alberta and Northwest Territories, Saskatchewan, Manitoba and Nunavut, and Newfoundland and Labrador, are federally appointed and report to the Director of Licensing within CAFC. These CFOs are usually referred to as federal CFOs and those provinces and territories as "Opt-out provinces and territories". The CFOs in the other provinces (Ontario, Quebec, New Brunswick, Prince Edward Island, and Nova Scotia) are provincially appointed. These provinces are bound to the CAFC by contribution agreements and are usually referred to as "Opt-in provinces and territories" and these CFOs are usually referred to as provincial CFOs.

The *Firearms Act* and its regulations establish the basic framework for the Canadian Firearms Information System (CFIS). CFIS is an automated information system that provides administrative and enforcement support to all partners involved in licensing of firearms owners/users, registration of all firearms and the issuance of authorizations related to restricted firearms.

The term adequate is defined on page 7 of this report.

2. Audit Objectives, Scope and Approach

2.1 Objectives:

The objectives of this audit engagement were to provide reasonable assurance that:

- A. The CAFC management control framework is adequate and effective to support its activities; and
- B. The CAFC operational processes are designed and conducted in a manner consistent with the *Firearms Act* and related regulations.

2.2 Scope:

As per the terms of reference for this audit, signed by the Chief Audit Executive and the Deputy Commissioner, National Police Services, the audit examined the management control framework in place and focused on risks and controls related to the following elements:

- change management – transition to the RCMP
- performance management
- partnerships and relationships
- risk management
- authorities, accountabilities, roles, and responsibilities
- monitoring
- client service and service standards
- communication
- privacy

As per this audit's terms of reference, the audit also examined the following CAFC operational processes: licensing (including continuous eligibility tracking), registration, safety courses, authorizations to transport and carry firearms, and shooting clubs and ranges.

Only federal CFO offices were considered in the review of CAFC operational processes. The engagement did not examine operational processes in provincial CFO offices since they are bound to the CAFC through separate contribution agreements. The engagement did not review processes performed at the CPS, including the enhanced screening process.

The Firearms Support Services Directorate, which was aligned with the CAFC to form an integrated CFP in June 2008, was not examined in this engagement.

2.3 Approach:

The term adequate is defined on page 7 of this report.

The audit engagement was planned and conducted to be in accordance with the Internal Auditing Standards for the Government of Canada.

The planning phase of this audit commenced in September 2007, while fieldwork began in March 2008 and concluded in January 2009. The examination employed various techniques including interviews, observations, walkthroughs, reviews of supporting documentation and analytical reviews.

The audit criteria used to develop the required audit tests were based on applicable policy, rules, regulations, and legislation, as well as the Canadian Institute of Chartered Accountants “Criteria of Control” (COCO) model, the Committee of Sponsoring Organizations of the Treadway Commission’s (COSO) “Internal Control – Integrated Framework”, the Control Objectives for Information and related Technology (COBIT) Framework, and the Treasury Board Secretariat (TBS) Management Accountability Framework (MAF).

The following table defines specific terms used in this audit report:

Adequate	Controls are adequate if management has planned and organized (designed) in a manner that provides reasonable assurance the organization's risks have been managed effectively and that the organization’s goals and objectives will be achieved efficiently and economically.
Effective	Controls are effective if they provide the desired effect.

The term adequate is defined on page 7 of this report.

3. Management's Response to the Audit

I am pleased to offer my comments on the 2009 Management Control Framework (MCF) Audit pertaining to the Canadian Firearms Program (CFP). On May 17, 2006, The CFP joined the RCMP portfolio. The amalgamation of the CFP into the RCMP was part of a broader announcement made by Minister of Public Safety, Stockwell Day, pertaining to firearms controls in Canada. This change is in keeping with the Government's objective of reducing gun crime while allowing Canadian police authorities to coordinate gun control activities with other crime control measures more effectively. The CFP is accountable to the Canadian public and the Government of Canada for the implementation of the firearms control program described in the *Firearms Act* and the *Criminal Code*. To achieve the goals and objectives of the legislation, the CFP manages registration, licensing, information tracking and dissemination activities as well as leading the development of policy related to these areas.

The RCMP accepts the results of the MCF Audit. Overall, the MCF Audit contained 5 principal findings as well as some additional suggestions to improve less significant issues. The CFP has made significant progress in building a framework to manage the Canadian Firearms Program efficiently and effectively and to ensure accountability. It will continue to do so in implementing measures to address the Audit findings.

We would like to acknowledge the audit team and thank them for their diligence throughout this important process.

**Tim Killam,
Deputy Commissioner,
Policing Support Services**

4. Principal Findings and Management Responses

The following summarizes the main audit findings based on the results described in Appendix A. For each recommendation presented, management is expected to:

- state whether they agree or disagree with the finding and recommendation;
- articulate the action to be taken;
- identify the position responsible for implementing the action plan; and,
- provide a completion date (month and year).

4.1 Audit Findings

Audit Finding 1 : Risk Management

Observation / Impact:

The CAFC did not have a formally documented risk management plan. Risks were described and mitigation actions or strategies were identified in the CAFC Business Plan, the Departmental Performance Report and the Report on Plans and Priorities. However, these were at a high level, and did not contain details, such as timelines and the identification of owners of actions items, that are typically included in a risk management plan.

While a Unit Level Quality Assurance process was intended to be the process through which risks would be identified and integrated in business planning, it was not fully implemented at the time of the audit.

A formal risk management approach, consistent with section 18.3 of the RCMP Administration Manual, should consider the likelihood and impact of risks, identify corrective measures, and be linked to business planning. In the absence of a CAFC/CFP-wide approach to risk management, there could be undue risk of exposure to events that could affect the effectiveness, timeliness and efficiency of program delivery.

Audit Recommendation 1	Management Action Plan
<p>The D/Commr PSS should ensure that:</p> <p>1. CAFC's management framework includes a formal risk management plan containing identification, communication, assessment and</p>	<p>1. The CFP agrees with the finding and recommendation regarding the establishment of a formal risk management plan. A formal risk</p>

The term adequate is defined on page 7 of this report.

<p>response to risk.</p>	<p>management plan will be put in place and this plan will address the requirements of the Treasury Board Secretariat Integrated Risk Management Framework and the RCMP.</p> <p>The approach to develop the risk management plan is projected to be completed by December 2009, with a roll-out to CFP units in April 2010.</p> <p>The final date for completion of the risk management plan is end of July, 2010, followed by the 1st cycle internal reviews by September 2011.</p> <p>Position responsible: Director of Strategic Integration and Program Management Services.</p>
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Audit Finding 2 :

Audit Finding 3 : Service Standards

Observation / Impact:

The CAFC had service standards in place for processing complete and accurate licence applications (30 days) and registration applications (45 days). Complete and accurate applications were system approved in CFIS. Licence applications that could not be system approved in CFIS were forwarded to CFO offices for follow up, and the existing service standards did not apply. Therefore, the service standards that were being monitored did not accurately measure the work conducted by CFO offices, because much of their work does not have standards.

Service standards were lacking for work conducted at CFO offices such as, applications that require follow up, Authorizations to Transport, and Firearms Interest to Police (FIP) events /continuous eligibility failures. Significant delays in processing FIPs may result in a risk to public safety. Additional service standards could be developed for licensing processes to provide a more accurate reflection of the quality of CFO services provided, and the resource levels required to provide these services.

The term adequate is defined on page 7 of this report.

Audit Recommendation 3	Management Action Plan
<p>The D/Commr PSS should ensure that:</p> <p>3. Appropriate service standards are established for the range of CAFC services, including services provided at CFO offices.</p>	<p>3. The CFP agrees with the finding and recommendation regarding the establishment of appropriate service standards for the range of CFP services. The CFP is going to focus on the top areas requiring service standards, based on the highest risk, most amount of time devoted, and public safety benefits.</p> <p>The service standards will be identified by January 2010. Consultation with CFOs and partners will occur prior to April 2010, and rollout of standards by June 2010.</p> <p>Position responsible: Director of Licensing and Registration.</p>

Audit Finding 4 : Business Licensing Processes

Observation / Impact:

Businesses conducting activities related to the *Firearms Act* may be inspected by Firearms Officers (FOs) under the authority of the *Firearms Act*. Inspections are conducted to ensure businesses' compliance with the regulations governing the *Firearms Act*, in particular the Storage, Display and Transportation of Firearms and Other Weapons by Businesses Regulations.

Walkthroughs of the business licensing process and analysis of a sample of 8 business licensing files from the CFO Alberta & Northwest Territories office determined that business inspections were the only monitoring control the CFO office used to ensure that safe storage and display requirements were met. However, business inspections were not always completed before approving a business licence application, and business inspection reports were not kept on file. In the absence of regular business inspections, the audit team could not conclude whether the process in place ensured that the safe storage and display requirements for businesses were being met.

The lack of regular and systematic business inspections may increase non-compliance

The term adequate is defined on page 7 of this report.

with the *Firearms Act* and related regulations. There is an increased risk that unsafe storage and display of ammunition and firearms will go undetected. Not following the safe storage regulations could put public safety at risk since there are less safeguards to prevent the public's access to ammunition and firearms.

Audit Recommendation 4	Management Action Plan
<p>The D/Commr PSS should ensure that:</p> <p>4. Regular and systematic business inspections occur.</p>	<p>4. The CFP agrees with the finding and recommendation regarding ensuring that regular and systematic business inspections occur.</p> <p>New business licensing processes, which include business inspections, will be incorporated into the overall development of national CFP policies and procedures and service standards.</p> <p>Consultation with CFOs and our partners will occur prior to April 2010, and the business inspections processes will be put in place by June 2010.</p> <p>Position responsible: Director of Licensing and Registration.</p>

Audit Finding 5 : Shooting Clubs and Shooting Ranges

Observation / Impact:

17 shooting club and shooting range files were reviewed (12 at the CFO Alberta & Northwest Territories office and 5 at the CFO Newfoundland & Labrador office). Analysis of these files indicated that the process to approve shooting clubs and shooting ranges was not conducted in a manner that is consistent with the *Firearms Act* and regulations.

Inspections were conducted at the time of initial application and shooting range approval, but in 9 cases they were not done for subsequent applications and approvals. Inspections did not necessarily ensure that all safety requirements had been met. In some cases, approvals were granted prior to receiving applications to renew a shooting range.

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Approvals were also at times granted with recommendations and in some cases for serious safety issues. Time frames were not given for operators to comply with recommendations, and there was no indication that follow up was done to ensure required changes occurred.

Inspections were deemed to be evidence that FOs ensured compliance with safety standards and other obligations set out in section 5 of the Shooting Clubs and Shooting Ranges Regulations. If approvals are granted without evidence of compliance documented through inspection reports, the CAFC risks not fulfilling its due diligence in approving shooting clubs and shooting ranges, particularly if incidents occur on shooting ranges that should not have been approved.

Audit Recommendation 5	Management Action Plan
<p>The D/Commr PSS should ensure that:</p> <p>5. Mandatory requirements, as per the Shooting Clubs and Shooting Ranges Regulations, and inspections are completed, prior to granting shooting clubs and shooting ranges approvals as well as renewals.</p>	<p>5. The CFP agrees with the finding and recommendation regarding ensuring that mandatory requirements and inspections are completed prior to granting shooting clubs and shooting ranges approvals and renewals.</p> <p>New processes for shooting clubs and shooting ranges licensing, which include inspections, will be incorporated into the overall development of national CFP policies and procedures and service standards.</p> <p>Consultation with CFOs and our partners will occur prior to April 2010, and the shooting clubs and shooting ranges mandatory requirements and inspection processes will be put in place by June 2010.</p> <p>Position responsible: Director of Licensing and Registration.</p>

5. Conclusions

5.1 Management Control Framework

Overall, an adequate management control framework was in place. CAFC strengths based on the

The term adequate is defined on page 7 of this report.

assessment in Appendix A are:

- change management - CAFC transition to the RCMP
- performance management regime
- collaborative initiatives and relationships with CAFC partners
- accountability, authority, roles and responsibilities defined and communicated
- monitoring external and internal environments
- facilitating access to CAFC services.

Areas requiring management action as a result of the assessment in Appendix A are:

- risk management plan
- service standards in CFO offices.

Additional suggestions to improve less significant issues identified in the assessment in Appendix A are:

- updating the privacy impact assessment
- enhancing communications and client feedback processes
- updating certain authorities delegated through letters of designation
- strengthening data quality improvement initiatives.

5.2 Consistency with Legislation and Regulations

Several of the CAFC operational processes examined were consistent with the *Firearms Act* and related regulations, based on the assessment in Appendix A. These were:

- administration of required firearms safety courses and tests
- design and conduct of the firearms registration process
- design and conduct of the authorizations to transport and authorizations to carry process
- checking continuous eligibility of licence holders
- design of the business and carrier licences process.

Areas requiring management action as a result of the assessment in Appendix A are:




- processes to issue business licences
- processes to approve shooting clubs and shooting ranges.

Appendix A - Overview by Audit Objectives



The following tables present the results of the audit engagement. Each objective and its corresponding criteria are presented, along with our opinion of the level of risk exposure that exists. An assessment is provided to further support our audit opinion.

The criteria used to assess the risk exposure were based on a number of control / governance frameworks, including the TBS MAF, CoCo, COSO, COBIT, as well as applicable regulations and policies.




The risk ranking (High, Medium, Low) is based on the level of potential risk exposure we feel may have an impact on the achievement of RCMP objectives and is indicative of the priority management should give to the recommendations.

Indicators	Risk Ranking
	High exposure/priority
	Medium exposure/priority
	Low exposure/priority



The assessment summarizes the audit observations based on the factual evidence gathered and analyzed during the audit. Based on these assessments, issues/themes along with potential causes, impacts, management initiatives and recommendations are summarized in the “Principal Findings” section.

Criteria	Risk Exposure	Assessment
Objective A - The CAFC management control framework is adequate and effective to support its activities.		
<p>1. A process is in place to effectively identify and manage changes related to the transition to the RCMP.</p>		<p>The CAFC had an internal process to effectively identify and manage changes related to the transition to the RCMP.</p> <p>The Transition Plan was the primary mechanism the CAFC used to anticipate, identify and react to events or activities resulting from the transition to the RCMP. Several elements supported the Transition Plan, including: an internal process to solicit management and employee comments during the transition to the RCMP; action plans at the operational level; and follow-up procedures to ensure appropriate change or action occurred.</p> <p>While some significant change initiatives related to the transition were not communicated to the appropriate people in a timely manner, this was due to the fact that the CAFC had been running its own IT network (CAFCNet) and had not yet been integrated to the RCMP's network. This had prevented the timely flow of communications to all federal CFO offices.</p>
<p>2. A process is in place to effectively identify and manage changes related to the information technologies resulting from the transition to the RCMP.</p>		<p>The CAFC implemented a Change Management Strategy (CMS) to effectively identify and manage IT changes resulting from the transition. The Change Control Board, an element of the CMS, was composed of all CAFC directors and co-chaired by a representative from the Chief Information Officer (CIO) Sector. It was the main forum where all IT changes were discussed and managed.</p> <p>The CMS was a means to handle all requests for transition-related changes to applications, procedures, processes, system and service parameters and the underlying platforms. It allowed for: managing problems; adequate audit trails being in place to track and solve problems; and updating system and user documentation and procedures</p>




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		<p>before implementing a system change.</p> <p>At the time of the audit, most roles and responsibilities formerly fulfilled by EDS (private company to which the IT aspects of the CAFC was contracted out) had migrated to the CIO Sector. Completing the remaining IT components of the transition would finalize the CAFC's migration to the RCMP.</p>
<p>3. Mechanisms are in place to effectively manage externally initiated changes that may affect the way in which the CFP is managed and delivered.</p>		<p>The CFP is a politically sensitive program. Anticipating externally initiated changes is challenging for the CAFC and binds it into a reactive approach.</p> <p>Mechanisms were in place to manage externally driven changes that may affect the way in which the CFP is managed and delivered, and a process to respond to these changes also existed.</p> <p>While some significant change initiatives related to the transition were not communicated to the appropriate people in a timely manner, this was due to the fact that the CAFC had been running its own IT network (CAFCNet) and had not yet been integrated to the RCMP's network. This had prevented the timely flow of communications to all federal CFO offices.</p> <p>The CAFC developed a Strategic Communications Framework and Implementation Plan during fiscal year 2008-09 to address and improve these aspects of internal communications.</p>
<p>4. CAFC Management has identified planned results linked to organizational objectives.</p>		<p>CAFC Management has identified planned results linked to organizational objectives.</p> <p>CAFC objectives were established and communicated, primarily through the Balanced Scorecard and Dashboard, the Annual Business Plan, the Results-based Management and Accountability Framework, and the Departmental Performance Report.</p>
<p>5. CAFC Management has identified</p>		<p>CAFC Management has identified appropriate and measurable performance indicators linked to planned results.</p>



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<p>appropriate and measurable performance indicators linked to planned results.</p>		<p>The Balanced Scorecard and Dashboard was the primary performance monitoring mechanism. CAFC used past results to determine performance targets. Planned performance targets were baselined at the current level of satisfaction with various aspects of the program. Targets were primarily based on results obtained through the 2008 RCMP Annual Core Survey. Target baselines were still to be determined for a minority of organizational objectives as data was still being collected on these measures.</p> <p>CAFC used the Cognos Business Intelligence Tool to provide current and past CFIS performance results. Regular meetings occurred between the CIO Sector and CAFC Management to discuss CFIS system-related performance statistics.</p> <p>Planned results were measurable and achievable and responsibility for monitoring and updating performance measures was clear and communicated. Results of performance measurement were documented, reported to required authority levels, and factored into decision-making.</p>
<p>6. Performance results are linked to management and staff evaluations.</p>		<p>The annual evaluation process for management and staff considered performance results. Performance agreements for the management team and directors took into account their individual responsibilities reflected in CAFC's Balanced Scorecard and Dashboard.</p>
<p>7. Lines of communication exist between the CAFC and its partners.</p>		<p>Formal communication processes and mechanisms existed and supported sharing information with partners. The CAFC had some mechanisms to capture feedback from external parties.</p> <p>The Strategic Communications Framework and Implementation Plan outlined formal communication processes, and additional mechanisms and opportunities for developing partnerships, sharing information, and obtaining external feedback.</p>



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<p>8. The CAFC leverages, where appropriate, collaborative opportunities to enhance citizen service.</p>		<p>The CAFC used its strategic planning process to identify opportunities for collaboration and partnerships. The CAFC’s Balanced Scorecard and Dashboard included partnership strengthening objectives. The Strategic Communications Framework and Implementation Plan detailed collaborative and partnership initiatives to be implemented over the short and long term.</p>
<p>9. The CAFC’s accountabilities in support of collaborative initiatives are formally defined.</p>		<p>The CAFC’s accountabilities in support of collaborative initiatives were formally defined. A Memorandum of Understanding (MOU) was in place for the CAFC’s formal horizontal initiative with CBSA. The MOU outlined the entities’ respective responsibilities related to implementing and administering certain parts of the <i>Firearms Act</i>.</p>
<p>10. CAFC Management has a documented approach with respect to risk management.</p>		<p>The CAFC did not have a formally documented risk management plan.</p> <p>Risks were described and mitigation actions or strategies were identified in the CAFC Business Plan and in the Departmental Performance Report and the Report on Plans and Priorities. However, these were at a high level, and did not contain the level of details, such as time lines and the identification of owners of actions items, that are typically included in a risk management plan.</p> <p>A Unit Level Quality Assurance (ULQA) process was being developed. Once fully implemented, the ULQA is intended to be the process through which risks will be identified and fed into the CAFC Business Plan.</p>



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<p>11-13. CAFC Management: - identifies the risks that may preclude the achievement of its objectives; - assesses the risks it has identified; - formally responds to its risks.</p>		<p>Risk management was conducted on a project basis rather than at the entity level. Business cases for projects and initiatives that were brought forward to the CAFC's Change Control Board (CCB) contained project-related risk identification and assessment. The CAFC's CCB identified, adjusted, and ranked risks within projects based on the risk assessments that were included in business cases brought forward.</p> <p>In the absence of a CAFC-wide approach to risk management, there could be undue risk of exposure to events that could affect the effectiveness, timeliness and efficiency of program delivery.</p>
<p>14. Authority, responsibility and accountability are clearly defined and communicated.</p>		<p>Responsibilities and performance expectations to which managers and supervisors were held accountable were defined in existing job descriptions. Middle managers and supervisors (CFOs, Operations Coordinators and the National Shooting Range Coordinator) understood and were aware of their responsibilities. Employees' duties and responsibilities were defined and understood for Program Assistants (PAs) and Firearms Officers (FOs).</p> <p>Overall, job descriptions reflected current duties. Some job descriptions were outdated and did not reflect the current organizational structure. However, the audit noted that when responsibility for the CAFC was transferred to the RCMP, a Classification Deferral Agreement was put in place whereby most job descriptions were not considered due for renewal until March 2009.</p> <p>For the most part, senior management job descriptions were signed off, but this was less consistent in CFO offices. Inconsistency in signing off on job descriptions may contribute to a lack of understanding of responsibilities and accountabilities.</p>



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<p>15. Responsibility and accountability are consistent with CAFC's objectives so that decisions and actions are taken by the appropriate people.</p>		<p>Management accountability, responsibility and performance expectations were generally aligned with the CAFC's objectives.</p> <p>The authority delegated to senior management through their job descriptions was appropriate.</p> <p>For the most part, operational authorities delegated by CFOs to PAs, FOs and Operations Coordinators through letters of designation were consistent with the <i>Firearms Act</i> and related regulations. The letters of designation complied with the duties, powers and functions defined by the <i>Firearms Act</i> and related regulations with the exception of outdated letters of designation in the Alberta & Northwest Territories and Manitoba & Nunavut CFO offices.</p> <p>Some of these letters were signed by a former CFO under a previous organizational structure (Northwest Region). They were no longer valid because the CFO Northwest Region position no longer exists. If these letters are not updated and signed by current CFOs, the CAFC may be exposed to risk because FOs would be performing duties without the proper authorization.</p>
<p>16. The organizational structure is up-to-date and widely communicated.</p>		<p>The organizational structure was up-to-date and widely communicated. It reflected key areas of responsibility and accountability within CAFC.</p> <p>While senior management felt good communication and reporting relationships existed at headquarters in Ottawa and in CFO offices, CFO offices felt a disconnect with headquarters. CAFC was aware of these concerns and was developing guidelines for CFO offices.</p>



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<p>17. Directors and managers at all levels formally acknowledge their understanding and acceptance of their accountability.</p>		<p>Annual performance evaluations and performance agreements for senior management were the principal means through which directors, managers and employees acknowledged understanding and acceptance of accountabilities. Formal and informal performance discussions were also conducted to ensure clear understanding of responsibilities.</p> <p>While the CAFC did not have a formal human resource management strategy, the CAFC identified this as a gap and was taking steps to address it.</p>
<p>18. External and internal environments are monitored to obtain information that may signal a need to re-evaluate the organization's objectives, policies and/or control environment.</p>		<p>Environmental scans were conducted internally on a regular basis and externally to some extent.</p> <p>Senior management took results from analysis into account when developing Balanced Scorecard measures, and when measuring progress against targets. Through this process, senior management determined changes required for objectives, policies and controls.</p> <p>Steps were taken to develop a unit level quality assurance process, but these were still in the early stage at the time of the audit.</p>


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<p>19. An adequate data quality improvement plan has been developed and implemented.</p>		<p>In response to the Office of the Auditor General’s (OAG) May 2006 Chapter 4 report recommendation for the CAFC to “validate addresses against information in other databases and check all records for entry errors and completeness”, CAFC developed formal data quality processes and procedures in its core business areas (Registry and Licensing). The Registry’s quality initiatives covered the spectrum of its activities. Licensing’s initiatives included data elements such as client addresses and client conjugal partner information.</p> <p>Data quality issues were identified and prioritized, and corrective actions were identified. Underlying causes were identified.</p> <p>While there was not a documented organizational structure for quality management, the responsibilities related to data quality were assigned. The Director of Operations was responsible for data quality as a whole, with the Director of Licensing and the Registrar each responsible for data quality in their areas.</p> <p>CAFC has developed some solutions to improve information in CFIS. However, documentation obtained by audit and interviews conducted did not confirm that there was a standard procedure or document in place to define measurements or to monitor the effectiveness of an overall Quality Management System (QMS) or continuing compliance to the QMS.</p>
<p>20. Feedback from users drives strategic and operational planning.</p>		<p>The CAFC did not have sufficient mechanisms in place to determine user satisfaction and identify improvement opportunities. While the CAFC had initiatives to engage partners and enhance public awareness, there was a lack of direct input from users and the public due to limited formal mechanisms for obtaining feedback.</p> <p>The feedback obtained from police officers through the Canadian Firearms Registry On-line (CFRO) survey results was explicitly considered and used</p>


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		<p>for 2008-2009 operational planning purposes, but this represented a single instance in which direct client feedback was obtained and considered in operational planning. The RCMP Core Survey provided limited client feedback.</p> <p>Since input from users was limited, user feedback was not fully available for strategic and operational planning processes. Failure to implement measures to obtain direct client feedback hinders the CAFC's ability to measure client satisfaction, ensure its services are aligned with users' needs, and identify opportunities to enhance service. Client satisfaction and understanding of the program may increase the potential for compliance with the <i>Firearms Act</i>.</p> <p>The CAFC has recognized the need for greater external monitoring. Initiatives to obtain direct feedback from clients have been identified in the Strategic Communications Framework and Implementation Plan.</p>
<p>21. The CAFC takes measures to facilitate access to its services.</p>		<p>The CAFC developed a Strategic Communications Framework and Implementation Plan in fiscal year 2008-2009 to guide communications with current and potential users.</p> <p>Users had access to CAFC's services via multiple service delivery channels, including: the CAFC public website; the 1-800 telephone services at the CPS Call Centre; face-to-face contact at CFO offices; high level communication activities; and outreach activities. Outreach activities conducted by CFO offices to inform potential users on CAFC's services were limited due to staffing shortages.</p>
<p>22. Service standards are set and communicated to clients, performance against standards is periodically</p>		<p>The CAFC had service standards for processing complete and accurate licence applications (30 days) and registration applications (45 days). Complete and accurate applications were system approved in CFIS. Internally, staff were aware of the standards, and externally, standards were posted on the CAFC's public website. Licensing service standards were also available online and on paper in</p>

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<p>measured and results acted upon.</p>		<p>the Information Sheet for the Possession and Acquisition Licence (PAL) application.</p> <p>The service standards that were being monitored do not accurately measure the work conducted by CFO offices, because much of their work does not have standards. Licence applications that could not be system approved in CFIS were forwarded to CFO offices for follow up, and the existing service standards did not apply.</p> <p>There were no service standards for work conducted at CFO offices such as applications that require follow up; Authorizations to Transport; and Firearms Interest to Police (FIP) events / continuous eligibility failures. Significant delays in processing FIPs may result in a risk to public safety. Additional service standards could be developed for licensing processes to provide a more accurate reflection of the quality of CFO services provided, and resource levels required.</p> <p>The OAG May 2006 report, Chapter 4 had also recommended that “to improve service to the public, the CAFC should analyze how long it takes to investigate and complete licence and registration applications that have client eligibility failures, identify the nature of the problems, and take appropriate action.”</p> <p>Senior management monitored client services using overall statistics of work queues and backlogs, as opposed to individual CFO offices, and measured them against service standards. Appropriate tools were being used for monitoring.</p> <p>The accuracy of senior management statistics may be compromised due to inconsistency in the way CFO offices manage work queues. If pending work was moved from a work queue, it did not necessarily mean that the work had been completed, yet statistics may not have captured this.</p>
<p>31. CAFC complies with the RCMP Privacy</p>		<p>A partial PIA was undertaken in 2004, prior to the CAFC’s transition to the RCMP, and submitted to the Office of the Privacy Commissioner. A PIA</p>

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

<p>Impact Assessment (PIA) policy and has implemented controls to reduce privacy related risks.</p>		<p>related to the CAFC was not completed following its transfer to the RCMP.</p> <p>While the CAFC’s partial PIA complied with most of the elements required of a PIA, as per the RCMP’s Administration Manual, a final version in both official languages was not completed.</p> <p>Based on the partial PIA, CAFC protected personal information it collected, used, retained, and disclosed. The CAFC identified the types of personal information it collects, who had access to it, and where it was stored. However, technological systems that best met service delivery requirements were still under examination at the time the partial PIA was undertaken, and these were not assessed.</p> <p>In the absence of an updated and complete PIA it is unclear if controls to reduce privacy related risks since the transition have been implemented.</p> <p>The absence of a complete PIA indicates non-compliance with the Treasury Board PIA Policy and the RCMP Administration Manual.</p>
<p>Objective B - The CAFC operational processes are designed and conducted in a manner consistent with the <i>Firearms Act</i> and related regulations.</p>		
<p>1. The process in place to issue an individual licence is designed in a manner that is consistent with the <i>Firearms Act</i> and related regulations.</p>		<p>Licence applications presenting no errors and eligibility failures were system-approved at the CPS. All applications presenting errors and eligibility failures were forwarded to the corresponding CFO office.</p> <p>Only individuals who held alternate certifications or had successfully completed the required Safety Courses and appropriate tests with a certified instructor were eligible to hold a PAL or a Minor’s licence.</p> <p>In the three CFO offices visited (Alberta & Northwest Territories, Manitoba & Nunavut, and Newfoundland & Labrador), the CFO has delegated authority to approve, refuse, or revoke individual licences to their FOs. However, the CFO remained</p>

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
		<p>ultimately responsible for issuing, refusing to issue or revoking individual licences in compliance with section 99 of the <i>Firearms Act</i>.</p> <p>CFOs relied heavily on their FOs' experience and knowledge in the process of issuing, refusing to issue or revoking individual licences. FOs based their decisions on investigations and/or verifications they performed.</p> <p>Best practices with respect to interviews were noted at the CFO Alberta & Northwest Territories office. However, the individual licensing process, as it was conducted in the three CFO offices visited, presented some weaknesses. There were differences in the investigation and interview process for licence applications from one CFO office to another and from one FO to another. There was also a lack of regular monitoring of FOs' work and decisions by the CFOs.</p> <p>The absence of standardized investigation and interview processes may lead to inconsistent decisions, could complicate the learning process of new FOs, and may affect the quality of their work. Limited monitoring of FOs' work may impact the quality of their decisions and in turn affect licensing data in CFIS. Regular monitoring of FOs' decisions would represent a quality assurance that may benefit both CAFC and its clients.</p>
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<p>2. Mechanisms are in place to ensure that the safety courses and related tests are administered by qualified and certified instructors.</p>		<p>Delivery of the Canadian Firearms Safety Course (CFSC) and the Canadian Restricted Firearms Safety Course (CRFSC) was managed at the provincial level rather than the national. Minimum qualification requirements to become a safety course instructor were set provincially and were different from one jurisdiction to another. A process was in place to ensure that only individuals who met provincial requirements were certified as instructors.</p> <p>CAFC had an instructor training course in place and was responsible for providing teaching materials necessary to deliver the safety courses and related tests. Six of the ten existing jurisdictions offered training sessions to future instructors prior to their certification. Insufficient information was obtained to determine whether this course was offered on a regular basis to maintain instructors' knowledge.</p> <p>Two of the three CFO offices visited (Alberta & Northwest Territories and Newfoundland & Labrador) contracted out the safety courses' delivery to external service providers. Tools and training facilities were under the responsibility of the service provider. In Manitoba & Nunavut, the CFO office was directly involved in the certification of instructors; however, regular monitoring was not performed.</p>
<p>3. Mechanisms are in place to ensure that the administration of safety courses and related tests is adequate.</p>		<p>Monitoring and problem solving mechanisms were in place to ensure that the delivery of safety courses and related tests met clients' needs.</p> <p>CAFC was responsible for developing the CFSC and the CRFSC content. This content and related practical tests were consistent with the Storage, Display, Transportation and Handling of Firearms by Individuals Regulations.</p> <p>There were no national standards for the safety courses' registration and exam fees because these were set at the provincial level. Provinces each had different mechanisms for delivering and monitoring the course.</p>

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<p>4. The process in place to issue an individual licence is conducted in a manner that is consistent with the <i>Firearms Act</i> and related regulations.</p>		<p>Analysis of CFIS individual licensing data for Opt-out provinces and territories, as of March 31 2008, indicated that as of that date, there were 684,487 unique and valid firearms licences in the Opt-out Provinces and Territories.</p> <p>PALs were renewed for the most part in same way they have been issued. Differences noted were in accordance with the <i>Firearms Act</i> and related regulations. Individual licences were issued or approved once proper investigation and verification had been completed by the CFO office.</p>
<p>5. The process in place to issue a business or carrier licence is designed in a manner that is consistent with the <i>Firearms Act</i> and related regulations.</p>		<p>The business licensing process was designed in a manner that is consistent with the <i>Firearms Act</i> and related regulations. Most of the work was performed by FOs and PAs through letters of designation from the CFOs. CFOs signed for the issuance, refusal to issue or revocation of business licences.</p> <p>The Registrar was responsible for issuing carrier licences to carriers that conduct business in Canada.</p>



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<p>6. The process in place to issue a business licence is conducted in a manner that is consistent with the <i>Firearms Act</i> and related regulations.</p>		<p>Analysis of 2,297 business licences of Opt-out provinces and territories as of March 31, 2008 indicated that for the most part, the process ensured separate business licences were issued for each location where a business was carried out. Each CFO office processed business licence applications differently.</p> <p>A sample of 8 business licensing files from the CFO Alberta & Northwest Territories office was reviewed. For that sample, the process in place ensured that a licence authorizing a business to possess prohibited classes of firearms, weapons, devices, and/or ammunition was issued only if the business needed to possess them for a prescribed purpose. For that same sample, the process also ensured that a business or a carrier licence was renewed in compliance with the <i>Firearms Act</i>.</p>
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		<p>Businesses conducting activities related to the <i>Firearms Act</i> may be inspected by FOs under the authority of the <i>Firearms Act</i>. Inspections are conducted to ensure compliance to the regulations governing the <i>Firearms Act</i>, in particular the Storage, Display and Transportation of Firearms and Other Weapons by Businesses Regulations.</p> <p>Walkthroughs of the business licensing process and analysis of the sample of business licensing files determined that business inspections were the only way the CFO office ensured that safe storage and display requirements were met. However, business inspections were not always done before approving a business licence application and business inspection reports were not necessarily kept on file.</p> <p>2 of the 8 files reviewed had comments in CFIS that an initial inspection had been performed. None of the 8 files reviewed had inspection reports on file. In the absence of regular business inspections, the audit team could not conclude whether the process in place ensured that the safe storage and display requirements for businesses were being met.</p> <p>The lack of regular and systematic business inspections may increase non-compliance with the <i>Firearms Act</i> and related regulations. There is an increased risk that unsafe storage and display of ammunition and firearms will go undetected. Not following the safe storage regulations could put public safety at risk since there are less safeguards to prevent the public's access to ammunition and firearms.</p> <p>A business may obtain a licence to sell ammunition, or a licence to possess firearms, prohibited weapons, restricted weapons, prohibited devices or prohibited ammunition. A licence issued to a business selling ammunition is valid for five years. A licence issued to a business to possess firearms, prohibited weapons, restricted weapons, prohibited devices or prohibited ammunition is valid for three years.</p>
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		<p>Results of data analysis of 2,297 business licences in Opt-out provinces as of March 31, 2008 indicated that licence validity periods for the 1,241 businesses with ammunition licences were compliant with the five-year regulatory term.</p> <p>There were two cases out of 1,056 where businesses that dealt with firearms had licence validity periods of five years instead of the three year regulatory term.</p>
<p>7. The process in place to issue a registration certificate is designed in a manner that is consistent with the <i>Firearms Act</i> and related regulations.</p>		<p>Registration applications were system processed unless they presented eligibility issues, and these applications were processed at the Registry.</p> <p>Registration certificates were issued at the Registry. Refusing or revoking registration certificates could be performed at the CFO office level as the Registrar had delegated this authority through letters of designation to some FOs. This was consistent with the <i>Firearms Act</i>.</p> <p>A registration certificate was issued once the firearm was described; an authorized person performed a verification; and a firearm identification number (FIN) was attributed.</p>
<p>8. The process in place to issue a registration certificate is conducted in a manner that is consistent with the <i>Firearms Act</i> and related regulations.</p>		<p>The list of all registration certificates in CFIS and the list of all individual and business licensing data for all the Opt-out provinces and territories on March 31, 2008 were analyzed to determine whether registration certificates issued were referenced to the right licence with the appropriate privileges and status.</p> <p>Of 2,633,758 registration certificates linked to individual licences, and of 81,217 registration certificates linked to business licences, the vast majority were linked to individual and business licences with appropriate privileges (98.28% and 99.09% respectively).</p> <p>The 1.72% of individual registration records which were problematic were either linked to licences with</p>


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		<p>inappropriate privileges, or to non-valid licences, or they had no registration number.</p> <p>The 0.91% of business registration records which were problematic were either linked to licences with inappropriate licence privileges, or ones that had no registration number.</p> <p>Many of these questionable records were, on March 31 2008 in a transitional state within a process that had not yet been completed. Once the entire business process had been completed, those records were found to be discrepancy free.</p> <p>Changes made to licensing data were not necessarily communicated to the Registrar and changes to registration data were not necessarily reported to the CFO offices. Because of this, inconsistencies between registered classes and licence privileges could exist.</p> <p>Data analysis of registration certificates indicated that each registration certificate was referenced to one firearms licence. The analysis also showed that the process ensured that each registered firearm was attributed a FIN.</p> <p>The process ensured that each authorized firearms verifier was properly qualified to classify and identify firearms. The process also ensured that a registration certificate for a firearm expired at its transfer or at its deactivation.</p>
<p>9. The process to issue authorizations to transport or carry firearms is designed in a manner that is consistent with the <i>Firearms Act</i> and related regulations.</p>		<p>Overall, the process to issue authorizations to transport (ATTs) or authorizations to carry (ATCs) firearms was designed in a manner that is consistent with the <i>Firearms Act</i> and related regulations. The process to issue ATTs and ATCs was different from one CFO office visited to another and there was no standard decision making process. Because of this, there may be inconsistencies between CFOs on how they should issue, renew, revoke or refuse ATTs and ATCs.</p>


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		<p>Through CFO letters of designation, FOs and PAs were authorized to approve transfers of restricted and prohibited firearms, approve short term ATTs and issue ATCs. While this was consistent with the <i>Firearms Act</i>, the CFOs were ultimately responsible for issuing, renewing, revoking, and refusing ATTs and ATCs.</p> <p>CFOs relied heavily on their FOs' and PAs' experience and knowledge in issuing, refusing to issue, or revoking ATTs and ATCs. There is a risk of over-relying on PAs' and FOs' experience instead of the CFO being more involved in the ATT and ATC process.</p>
<p>10. The process in place to issue authorizations to transport or carry firearms is conducted in a manner that is consistent with the <i>Firearms Act</i> and related regulations.</p>		<p>Based on reviews of 6 ATC files at the CFO Alberta & Northwest Territories office, and 7 ATC files at the CFO Newfoundland & Labrador office, ATCs were issued and renewed based on a proof of firearms proficiency. Training in the use of force was required for ATC employment applications, but it was not required for ATC wilderness applications.</p> <p>The three CFO offices visited had different processes in place to ensure that public safety risk was considered and evaluated before issuing an ATT. However, the assessments the CFO offices carried out ensured that transportation did not pose a threat to the public and were in compliance with the Storage, Display, Transportation and Handling of Firearms by Individual Regulations, and the Authorization to Transport Regulations.</p> <p>The period of validity for ATTs and ATCs at issuance and on renewal was not the same from one CFO office to another. However, within the same CFO office, initial and renewed ATTs and ATCs were processed in the same manner.</p>

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<p>11. The process in place to deal with Shooting Clubs and Shooting Ranges is conducted in a manner that is consistent with the <i>Firearms Act</i> and related regulations.</p>		<p>17 Shooting Club and Shooting Range files were reviewed (12 at the CFO Alberta & Northwest Territories office and 5 at the CFO Newfoundland & Labrador office). Analysis of these files indicated that the process in place to approve Shooting Clubs and Shooting Ranges was not conducted in a manner that is consistent with the <i>Firearms Act</i> and regulations.</p> <p>Shooting Clubs and Shooting Ranges applications were processed manually and monitored by jurisdiction instead of through CFIS.</p> <p>14 of the 17 files reviewed had issues with respect to missing or insufficient documentation, and unresolved issues with shooting ranges. Most of these issues were with respect to continuing compliance with regulations and shooting range inspections.</p> <p>Of the sample examined, inspections were conducted at the time of initial application and Shooting Range approval, but in 9 cases they were not done for subsequent applications and approvals. Inspections did not necessarily ensure that all safety requirements had been met. Approvals were granted prior to receiving applications to renew a Shooting Range. Approvals were also at times granted with recommendations and in some cases for serious safety issues. Time frames were not given for operators to comply with recommendations, and there was no indication that follow up was done to ensure required changes occurred.</p> <p>New applications for existing or previously approved Shooting Clubs and Shooting Ranges after the initial 5 years of approval were not refused or revoked, regardless of outstanding or missing documentation, or evidence of compliance. Of the sample examined, notations were not made on files with a rationale for these approvals.</p>
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		<p>There was a lack of formal monitoring or quality assurance process. The National Shooting Range Coordinator’s involvement with jurisdictional FOs was strictly voluntary. The National Shooting Range Coordinator could make recommendations to CFOs, but they were not obliged to implement them.</p>
<p>12. The process in place to check the Continuous Eligibility of firearms licences holders is conducted in a manner that is consistent with the <i>Firearms Act</i> and related regulations.</p>		<p>12 Continuous Eligibility files were reviewed from the CFO Newfoundland & Labrador office. The process to check the Continuous Eligibility of firearms licence holders was conducted in a manner that is consistent with the <i>Firearms Act</i> and related regulations.</p> <p>At CFO offices, PAs performed an initial triage of files flagged for continuous eligibility in CFIS. Files requiring further investigation were assigned to FOs through CFIS. PAs and FOs used information systems such as CFIS, the Canadian Police Information Centre (CPIC), and the Police Reporting and Occurrence System (PROS) to carry out their work.</p> <p>Service standards were not established for investigating Continuous Eligibility failures. Having service standards in terms of the number of days to deal with a Continuous Eligibility flag may help address the risk to public safety associated with Continuous Eligibility failures.</p> <p>Although work was assigned by PAs to FOs in CFIS work queues, these were not always used to the fullest extent. This could cause delays in FOs investigating files and potentially place the public at risk.</p>

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Appendix B - Acknowledgements

We would like to thank all staff who cooperated with and assisted the Internal Audit team during the audit.

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