



Canada Border
Services Agency

Agence des services
frontaliers du Canada

Canada

Audit of duty firearms

Internal Audit and Program Evaluation Directorate

June 2024



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Introduction

In 2016, the Canada Border Services Agency (CBSA or the agency) completed the initiative of arming its workforce at ports of entry¹ and in Intelligence and Enforcement functions. The agency created the infrastructure, processes and training to equip officers with defensive equipment and a duty firearm.

In 2023 to 2024, the CBSA had approximately 6,500 armed officers spread across ports of entry and inland offices² and more than 12,600 duty firearms in its inventory³. The agency also maintains more than 10 million rounds of training and duty ammunition in its inventory and uses approximately 3 million rounds in ammunition annually⁴.

The agency has adopted a policy, directives, standard operating procedures and guidelines on Firearms and Defensive Equipment, Use of Force Reporting, as well as Defensive Tactics Training. This policy suite (herein referred to as “policy”) sets the expectations, roles and responsibilities of agency stakeholders

¹ Except for officers in postal and air modes. Officers in the air mode are trained and certified to carry duty firearms but are not authorized to carry their duty firearms while on shift inside an airport, except under specific circumstances, due to legislation and regulations from Transport Canada. (*Firearms Act, Public Agents Firearms Regulations*)

² Number of CBSA armed officers as of April 2023.

³ Number of duty firearms as at September 2023, from the Corporate Administrative System (CAS).

⁴ Number of ammunition in inventory, and average use in the last years, from CAS.

so that officers can be provided with guidelines and training to safely wear, handle and use protective and defensive equipment.

Significance of the audit

The Arming Initiative introduced a wide range of changes and impacts across the agency, including culture, recruitment, training, and officer health and safety. Rigorous processes and controls are required to maintain a well-managed program and ensure the health and safety of employees.

An Evaluation Study of Arming took place at the same time as this Audit of Duty Firearms. Its goal was to assess the relevance, effectiveness and efficiency of the agency's Arming governance, policy, training, equipment, and use of resources. The final evaluation report will be presented to the Performance Measurement and Evaluation Committee in July 2024.

Given the importance of this subject, this audit was approved as part of the 2023 to 2024 Risk-Based Audit and Evaluation Plan.

The objective of the audit was to assess the controls, processes and practices established by the agency to oversee the authorized and appropriate use, tracking and storage of duty firearms.

The scope period for the audit was April 1, 2021 to March 31, 2024.

The scope of the audit included:

- storage and tracking of duty firearms (simply referred to as firearms) and ammunition
- tracking of prescribed training certification and re-certification required to carry firearms
- use of force incident reviews that involved the use of a firearm

The scope excluded the following:

- handling, storage and inventory of seized firearms
- use of force incidents that did not involve the use of a firearm
- services provided by the Royal Canadian Mounted Police's (RCMP's) Armoury⁵, and secure storage of firearms and ammunition located at RCMP or Department of National Defence facilities
- financial management of the inventory of firearms and ammunition

The audit team employed the following methodology to provide an audit-level assurance:

- conducted walkthroughs and interviews with 120+ key stakeholders, including regional and headquarters subject matter experts
- assessed controls for a sample of 15 sites where armed officers work, including testing of firearms, ammunition, storage and inventory tracking at 8 of those sites
- reviewed 250+ supporting documents, including legislation, policies, directives and standard operating procedures
- analyzed and tested data from the Corporate Administrative System (CAS)⁶ and the Incident Management and Reporting System (IMRS)

Refer to [Appendix A](#) for further details on the lines of enquiry and criteria used in this audit and [Appendix C](#) for the sample selection.

⁵ The RCMP's Armoury provides the CBSA with maintenance and repair services for duty firearms through an arrangement.

⁶ CAS is a commercial software from SAP that has been customized for the agency to process financial, and non-financial transactions e.g., human resources, payroll and compensation. It consists of several modules that are integrated through a central database to allow efficient and real-time processing.

Statement of conformance

This audit engagement conforms to the related Treasury Board's *Policy and Directive on Internal Audit* and the Institute of Internal Auditors' (IIA) *International Professional Practices Framework*. Sufficient and appropriate evidence was gathered through various procedures to provide an audit level of assurance. The agency's internal audit function is independent and internal auditors performed their work with objectivity as defined by the IIA's *International Standards for the Professional Practice of Internal Auditing*.

Audit opinion

The agency has established controls and processes to oversee the authorized and appropriate use, tracking and storage of duty firearms and ammunition. A high level of compliance was found in many areas related to the safeguarding of firearms and ammunition, training, and oversight over the use of force.

Despite these results, opportunities exist to further strengthen practices through clarifying policy expectations to achieve greater consistency across the Regions. This will help ensure a well controlled program moving forward.

Key findings

- The agency established effective procedures and practices for storing, transporting and tracking firearms and ammunition in ports of entry and inland offices.
- Local management monitored the storage and tracking of inventory of firearms and ammunition at sites, but it was not always in alignment with policy requirements. Physical verifications by an independent oversight function were no longer performed.
- Processes to ensure that armed employees are certified and re-certified through appropriate training were established and effective, including the provision of temporary extensions. Processes could be strengthened through timely extension requests and processing as well as by tracking administrative removals.
- The agency reviewed incidents involving duty firearms to ensure that the employees' use of force was appropriate, safe and in accordance with policy and training. Although timeliness of incident reviews had improved in the last year, certain stages often did not meet the expected timelines.
- Processes were in place and managers understood their responsibilities to conduct non-administrative removals.

Summary of recommendations

1. Update the Defensive Tactics policy suite, including oversight responsibilities for firearms and ammunition, and monitor its compliance.
2. Strengthen the oversight over the defensive tactics training certification in recording and monitoring administrative removals, and improving the submission and processing of temporary extension requests.

Management response

Following the completion of the Audit of Duty Firearms in March 2024, CBSA senior management made a decision to move the Defensive Tactics Policy suite from the Travellers Branch (TB) to the Human Resources Branch (HRB) in August of 2024. As a result, this management response and action plan was amended to reflect the transfer of ownership of the policy suite from TB to HRB.

The HRB welcomes the results of the Audit of Duty Firearms and accepts all recommendations made.

In 2016, the CBSA completed arming its workforce at ports of entry and in intelligence and enforcement functions. This initiative had a profound change on agency culture, recruitment and training practices, as well as officer health and safety considerations. Today, the agency has approximately 6,500 armed officers at ports of entry across Canada and inland offices, with an inventory of 12,600 duty firearms. The agency maintains more than 10 million rounds of training and duty ammunition, using roughly 3 million rounds annually.

The Defensive Tactics program is administered via a suite of policy documents including, directives, standard operating procedures and guidelines on firearms, defensive equipment, use of force and DT Training. The HRB is the owner of these inter-related documents since August 12, 2024. The ownership was shared with the TB up to that date.

Overall, the findings of the audit were very positive, with the determination that the CBSA established the controls and processes necessary to oversee the authorized and appropriate use, tracking and storage of duty firearms and ammunition. A high level of compliance was found in many areas related to the safeguarding of firearms and ammunition, training, and oversight of use of force. Despite these favorable results, opportunities exist to further strengthen practices through clarifying policy and procedures which will allow for greater consistency across the regions.

TB and HRB recognized that there is a fragmentation of the DT program and a need for a review and possible realignment of the policy suite and the program administration which led to the reorganization outlined above. This will optimize subject matter expertise, consultation, collaboration and program management. In addition, the need for ongoing comprehensive and cohesive communication between all DT program stakeholders is necessary, with an inherent understanding that all branches are implicated and connected through their roles and responsibilities in the overall program administration.

HRB looks forward to working collaboratively with all impacted stakeholders to support on required policy and procedural updates, in order to satisfy the recommendations of this audit.

Audit findings

The audit resulted in the findings below.

Safeguarding and inventory tracking of duty firearms and ammunition

This section is divided into six subsections:

- Background
- Storage of firearms and ammunition: at an agency office
- Storage of firearms and ammunition: outside an agency office
- Controlling access to duty firearms and ammunition
- Inventory tracking in the Corporate Administrative System (CAS)
- Monitoring and oversight (Local, Regional, National Headquarters)

Background

Managers and employees are responsible for the safety and security of the work place, including the proper use, maintenance and storage of defensive equipment⁷.

At an agency office: Armed Officers are responsible for the proper use, maintenance and storage of defensive equipment, including firearms and ammunition at agency offices.

Managers must ensure that firearms and ammunition are properly tracked and stored, and are only accessed by authorized employees.

Outside an agency office: Armed Officers are responsible for attaining authorization and properly storing defensive equipment when required to transport firearms and ammunition outside agency offices.

Managers must provide authorization for firearms stored outside of agency offices. Officers must carry a completed and signed BSF390 form.

Access controls: Armed Officers are granted access to the arming room as well as to a specifically assigned locker where their defensive equipment is stored.

Managers at sites where armed officers work are responsible for ensuring that the defensive equipment is securely stored.

Inventory tracking: Administrative staff enter transactions in CAS related to movements of firearms and ammunition to maintain accurate and up-to-date inventory records.

Managers are ultimately responsible for ensuring that inventory records in CAS are up-to-date throughout their lifecycle.

Storage of firearms and ammunition: at an agency office

At agency ports of entry and offices where armed employees work, firearms and ammunition must be stored in assigned storage compartments within a locker inside the arming room. Keys and combinations to locking devices must be kept separate from the firearms and not accessible to others⁸.

The audit assessed whether firearms and ammunition were safeguarded and securely stored at the agency offices according to CBSA arming policy.

Sites in our sample were informed of the testing in advance of our visit. This early notification may have impacted the high compliance rates. The results are limited to the sites visited and do not represent overall agency results.

Refer to [Appendix C](#) for sample selection.

What the audit found

- All 15 sites in the sample had adequate storage practices to ensure that firearms and ammunition were securely stored.
 - issued firearms and ammunition were securely stored in individually assigned storage compartments

⁷ CBSA Policy on Use of Force and Defensive Equipment; November 7, 2023.

⁸ CBSA Directive on Agency Firearms and Defensive Equipment, November 7, 2023

- unassigned and practice firearms and ammunition were securely stored in separate locked cabinets with limited access to authorized personnel
- Of the 15 sites, the audit team visited 8 to directly observe storage and inventory practices for 162 firearms.
 - Nine of the 162 (6%) firearms selected were not available for testing due to one of four reasons: the officer was either on duty, on assignment, had a shift at another work location, or their firearm had been sent for repair.
 - 152 out of 153 (99%) available firearms and assigned ammunition were safely stored in accordance with the policy. The one remaining firearm was not safely stored as the cable lock key was left with the firearm in the locker compartment. Management took immediate action to rectify the situation.

Storage of firearms and ammunition: outside an agency office

When an officer is required to transport and store their firearm at a location other than a CBSA office, they must be given permission and be in possession of an approved “Authorization to Possess, Transport or Store Firearms” (ATT or BSF390 form). The ATT is required for the duration of the period in which the firearm is removed from the CBSA office and should not exceed three months⁹. The authorization is not required in the course of officers’ duties at a CBSA office or when travelling on duty. The form authorizes the transport of the firearm and documents the storage location when not on duty.

The audit assessed the processes and practices in place at 15 sites to authorize, transport and store firearms outside an agency office.

What the audit found

- Procedures were in place at 13 of the 15 sites to issue an authorization for storing firearms at a location other than an agency office.
- The remaining two sites in our sample authorized the transport of firearms off CBSA premises, but they issued ATTs for a period exceeding three months, which is not in compliance with policy requirements.
 - Management of these sites issued ATTs between 6 and 12 months in length as officers frequently needed to take their firearm outside their primary office to work at other CBSA sites.
 - In addition to the form, local management at these sites required officers to seek approval from management when taking their firearm offsite, which provided awareness of their movements outside of the assigned office.

Although an ATT form was in use to authorize and transport firearms off CBSA premises, ensuring compliance with policy requirements is important to maintain consistent practices and ensure authorization remains valid.

Refer to [Recommendation 1](#) for details.

⁹ CBSA Directive on Agency Firearms and Defensive Equipment, November 7, 2023

Controlling access to duty firearms and ammunition

Security and Professional Standards Directorate is responsible for establishing and evaluating the standards for the secure storage of agency firearms. Local managers are responsible for ensuring that all officers and employees securely store firearms, ammunition and other defensive equipment¹⁰.

The audit assessed the procedures and controls to manage access to CBSA buildings, arming rooms, storage lockers and compartments where firearms and ammunition are stored, as well as the use of access cards and keys.

Refer to [Appendix C](#) for sample selection.

What the audit found

- The audit confirmed that at all 15 sites, procedures to control access, including unassigned and removed firearms, aligned with policy.
 - Management controlled access to CBSA buildings, arming rooms, storage lockers and compartments to store firearms and ammunition, along with keys to open locker compartments.
 - Authorized administrative staff handled firearms and ammunition under management supervision.
 - Firearms removed¹¹ from officers were stored in an unassigned locker compartment only accessible to management and the authorized administrative staff. In some cases, managers indicated that depending on the reasons for removal, officer's access to the arming room or the entire site would also be revoked.
- At 3 out of 15 sites, we observed gaps in access controls:
 - access to the arming room was restricted with a keypad lock instead of key fobs
 - access codes were not changed frequently
 - intrusion alarm or closed-circuit television system were not functioning
- While these gaps were known, management was not concerned about the day-to-day access to firearms and ammunition as there is a combination of controls that limit and oversee their access.
 - The agency has a process to identify access control gaps. Security Threat and Risk Assessments of facilities and infrastructure are performed and where required, viable mitigating solutions are recommended and their implementation is overseen.

Inventory tracking in the corporate administrative system (CAS)

CAS is the CBSA's central registry for tracking the inventory of duty firearms and ammunition. Managers are required to ensure inventory movements are recorded in CAS.

The audit examined the procedures to track firearms and ammunition stored at agency offices, and tested whether transactions were recorded in an accurate and timely manner.

¹⁰ CBSA Policy on Use of Force and Defensive Equipment; November 7, 2023 and CBSA Directive on Agency Firearms and Defensive Equipment; November 7, 2023.

¹¹ Duty firearms or defensive equipment issued to an officer, employee or recruit is the property of the agency, and may be removed at the discretion of management. Removal of a firearm can be for administrative or non-administrative reasons. CBSA Directive on Use of Force and Defensive Equipment; November 7, 2023.

Sites in our sample were informed of the testing in advance of our visit. This early notification may have impacted the high compliance rates. The results are limited to the sites visited and do not represent overall agency results.

Refer to [Appendix C](#) for sample selection.

What the audit found

- For most sites selected, management regularly tracked and accurately recorded firearms and ammunition. Opportunities exist to further ensure that movements of firearms and changes in ammunition status are accurately captured, in a timely manner, in CAS.
- Management and supporting administrative staff from all 15 sites ordered additional ammunition from the national warehouse, received the ammunition deliveries, and recorded receipt, issuance and consumption of the ammunition in CAS.
- The audit team tested 153 firearms and their records in CAS.
 - 148 of 153 (97%) firearms stored on site were accurately recorded, but five were not. The five CAS records had been marked as “unassigned” despite the fact that they had been assigned to officers. Management stated that CAS would be updated accordingly.
 - Two of the five firearms were tracked in a local tracker while awaiting entry in CAS by the end of the day
- In assessing training records (refer to [Annual qualification and three-year re-certification](#)), CAS was not updated in three other instances to show that firearms had been returned by employees that were no longer required to be armed.

Refer to [Appendix C](#) for sample selection.

The accurate and timely recordkeeping in CAS helps maintain reliable inventory records, which makes the process of locating, retrieving and identifying the assigned firearms more efficient when incidents occur.

Refer to [Recommendation 1](#) for details.

Monitoring and oversight: local management

Managers are required to ensure that the ammunition inventory is verified at least quarterly and that unexplained discrepancies are reported to the Defensive Equipment Management Unit (DEMU) and the Security and Professional Standards Directorate (SPSD)¹². Managers are also required to complete the Manager’s Duty Firearm Inspection Checklist on an annual basis¹³.

The audit assessed whether oversight and monitoring mechanisms at the local management level were established to ensure compliance with policy requirements for the safeguarding and tracking of firearms and ammunition.

What the audit found

Local management from the 15 sites conducted reviews for and monitored the safeguarding and inventory tracking of firearms and ammunition. The procedures followed and the frequency of reviews varied from one site to the other and did not always comply with policy requirements.

¹² CBSA Standard Operating Procedure (SOP) on Agency Firearms and Defensive Equipment; November 7, 2023.

¹³ CBSA SOP on Agency Firearms and Defensive Equipment; November 7, 2023.

Quarterly Verification of Ammunition: at seven of the fourteen¹⁴ sites, management said that these verifications were performed on a quarterly basis. The remaining sites were not aware of this requirement.

- The sites did not keep records of the verifications since there was no requirement by policy to report on results. The audit was therefore unable to confirm the above.

Manager's Duty Firearm Inspection Checklist: only one out of the 15 sites had used the Checklist to conduct an annual inspection. The other 14 sites performed reviews on storage and tracking of firearms but not as prescribed by policy. They indicated that they were not aware of the existence of the checklist, or the expectation to complete it.

- The policy did not specify the requirement for tracking the performance of the inspections, or reporting on their results.
- Management at some of the sites noted that while sections of the checklist were relevant, the areas were covered by other forms of oversight.

Consistent cyclical verifications help ensure managers have sufficient oversight over the safeguarding and tracking of firearms and ammunition. Without reporting, the program cannot have visibility to ensure policy compliance and the appropriate safeguarding of these tools.

Monitoring and oversight: regional management

Regional management is required to ensure that operational staff involved with firearms and other defensive equipment comply with CBSA policy. They should liaise with stakeholders in National Headquarters (NHQ) on all matters related to the issuance, maintenance, handling, transportation and storage of defensive equipment¹⁵.

The audit assessed whether oversight and monitoring mechanisms at the regional management level were established to ensure compliance with policy requirements for safeguarding and tracking of firearms and ammunition.

What the audit found

Except for one region, we found no evidence of formal regional oversight activities related to the safeguarding and inventory tracking of firearms and ammunition across the agency.

- In one region, the regional program office tasked the sites to complete quarterly verifications of firearms and ammunition, and monitored their completion and results. Management at both sites selected within that region had performed quarterly verifications of firearms and ammunition using a standardized regional approach.

Regional management across the agency could play a key oversight role in the performance of these activities in their regions to ensure that gaps are identified and corrected when required.

Reinforcing expectations related to the performance of verifications at sites, as well as monitoring by management would strengthen the oversight over firearms and ammunition. Sharing them with the Program at NHQ would facilitate overall program and policy improvements.

Without regular oversight, regional management has no assurance on the level of compliance with policy requirements for the safeguarding and inventory of firearms and ammunition.

¹⁴ The remaining site, the fifteenth, had no inventory of ammunition to verify.

¹⁵ CBSA *Directive on Agency Firearms and Defensive Equipment*; November 7, 2023.

Refer to [Recommendation 1](#) for details.

Monitoring and oversight: National headquarters

This subsection is divided into 3 divisions / units.

Security operations division - Security and professional standards directorate

The SPSD is accountable for establishing and ensuring the performance of annual audits (referred to as physical verifications) of the inventory, assignment, storage and use of all agency firearms and controlled items, as well as for reporting the results to the DEMU¹⁶. This independent verification is required to ensure proper management of defensive equipment.

The audit assessed the processes and procedures performed by the SPSD to determine whether those monitoring activities met the policy requirements for the safeguarding and tracking of firearms and ammunition.

What the audit found

- Security Operations Division provided assurance on regional compliance with overall security policies and procedures by performing review on-site activities, such as Threat and Risk Assessments, security inspections and assessments, and reporting information related to security incident reports.
- Prior to 2019, regional security teams performed on-site physical verifications of the storage and inventory of duty firearms at sites. With Nationalization of Services¹⁷, the regional security teams began reporting to the Security Operations Division, within SPSD and ceased those verifications across the agency. Since then, the Security Operations Division only has performed ad-hoc physical verifications at the request of management, but at the time of this audit, these verifications were no longer conducted.
- Although regional security teams ceased the physical verifications, the SPSD retained responsibility in the policy for ensuring they were conducted, which was not being performed.
- These verifications provided valuable independent oversight and identified issues related to access controls, storage and tracking of firearms, and compliance with security policies and guidelines.

Interviewees from many and inland offices expressed that there was a need for an independent oversight of firearms and ammunition at the national level.

The annual verifications that were performed prior to 2019 provided an additional level of assurance.

- Feedback/sentiments were gathered through interviews

Without independent oversight of physical verifications, the program may not have assurance that firearms and ammunition are properly managed.

Refer to [Recommendation 1](#) for details.

Defensive equipment management unit – Force generation and strategic direction

The DEMU, within Force Generation and Strategic Direction, is the Business Process Owner for the tracking of firearm and ammunition inventory in CAS¹⁸.

¹⁶ CBSA Policy on Use of Force and Defensive Equipment; November 7, 2023 and CBSA Directive on Agency Firearms and Defensive Equipment; November 7, 2023.

¹⁷ Nationalization of services was an initiative under CBSA Renewal, which changed the regional reporting to national reporting.

¹⁸ CBSA Policy on Use of Force and Defensive Equipment; November 7, 2023.

The audit assessed the processes and procedures conducted by the DEMU to determine whether those monitoring activities met the policy requirements for the safeguarding and tracking of firearms and ammunition.

What the audit found

The DEMU authorized and monitored CAS transactions of firearms and ammunition, and provided training and support to CAS users.

- In 2022, the DEMU proactively started conducting informal verifications of the firearm and ammunition inventory recorded in CAS as a substitute for the physical verifications that used to be performed by Regional Security.
 - The DEMU's informal verifications did not cover all elements that were included in the physical verifications. They were conducted administratively by asking local management to perform a reconciliation of the physical inventory of defense equipment (including firearms and ammunition) to the one listed in CAS.
 - The informal verifications by the DEMU identified instances of errors requiring correction in firearms and ammunition records in CAS.
 - Since this initiative started, the DEMU had conducted one informal verification for each of the 14 sites in our sample. As per the DEMU, the informal verifications were not applicable to the national warehouse, the last site in our sample.

While the DEMU verifications may help uncover and address emerging discrepancies in inventory records, they did not provide the same level of rigour and independent on-site monitoring that used to be performed by the SPSD prior to 2019.

Program compliance division – Travellers policy and programs directorate

The Program Compliance Division, within the Travellers Policy and Programs Directorate, is accountable for monitoring compliance with the defensive tactics policy and its related directives, procedures and guidelines. It is also responsible for ensuring that corrective actions are taken to address any issues¹⁹.

The audit examined the processes and procedures of the Program Compliance Division, Travellers Branch and assessed whether monitoring activities met the policy requirements for the safeguarding and tracking of firearms and ammunition.

What the audit found

Clarity of roles and responsibilities: some requirements were not clearly articulated or they were absent from the policy. For example:

- There was no requirement for managers to retain the records for inspections of firearms and verifications of ammunition performed (refer to [Monitoring and oversight: local management](#)).
- There was no requirement to report the results of the quarterly verifications of ammunition (refer to [Monitoring and oversight: national headquarters](#)). The policy only required discrepancies be reported.

Compliance monitoring: the Program Compliance Division was not actively monitoring compliance related to the safeguarding and tracking of firearms and ammunition and therefore was not aware of the gaps identified in this audit regarding quarterly verifications of ammunition, firearm inspections by

¹⁹ CBSA Policy on Use of Force and Defensive Equipment; November 7, 2023 and CBSA *Directive on Agency Firearms and Defensive Equipment*; November 7, 2023.

local management (refer to [Monitoring and oversight: local management](#)) and monitoring and reporting by the SPSD (refer to [Monitoring and oversight: national headquarters](#)).

Monitoring policy compliance is necessary to ensure non-compliance is identified and addressed through corrective action and that program objectives are met.

Why this matters

Monitoring compliance with policy provides assurance that roles and responsibilities are clear, oversight activities are performed, and controls are appropriate.

Without confirmation that quarterly verification of ammunition and annual inspection of firearms are being performed, the agency does not have assurance that oversight is occurring over inherently high risk assets.

Recommendation 1

The Vice-President (VP) of TB, in consultation with the VPs of the HRB and the Finance and Corporate Management Branch, should update and enforce the Defensive Tactics policy suite by:

- a. Revising the requirements and responsibilities of stakeholders for performing:
 - quarterly ammunition verifications and the annual firearm inspections
 - periodic physical verifications of firearms and ammunition by an independent function
- b. Reinforcing expectations for managers regarding:
 - the authorization for transporting and storing firearms outside of agency facilities
 - the upkeep of inventory records in CAS for firearms and ammunition
 - the submission of use of force incident reports
- c. Clarifying the process including roles and responsibilities when instances of employee self-harm or suicide occur
- d. Communicating policy updates to all stakeholders and monitoring compliance

Following the completion of the audit in March 2024, CBSA senior management made a decision to move the Defensive Tactics Policy suite from TB to HRB in August 2024. As a result, this management response and action plan was amended to reflect the transfer of ownership of the policy suite from TB to HRB.

Management response

The VP of HRB agrees with this recommendation and will work in close partnership with the VP of the Finance and Corporate Management Branch to ensure that each branches' respective functions are revised by the functions business owner. Updates will be made to the requirements for verifying defensive equipment storage and for authorizing their transportation and storage outside of agency facilities. Information sessions will be provided to users to ensure the accurate upkeep of inventory in CAS, messaging will be prepared regarding the importance of submitting use of force incident reports in a timely manner, and a procedure for internal administrative review in cases of employee self-harm or suicide will be developed. The VP of HRB will communicate policy updates to all stakeholders and ensure compliance monitoring is being reported by responsible areas annually.

Completion date: October 2025

Certification and re-certification to carry a duty firearm

This section is divided into three subsections:

- Background
- Annual Qualification and Three-Year Re-Certifications
- Temporary Extensions

Background

The CBSA has established a process to ensure that armed officers have received the necessary training and can demonstrate the required skills and abilities to carry and safely handle their firearm in appropriate circumstances. The CBSA *Directive on Firearms and Defensive Tactics Training* describes the key roles and responsibilities of stakeholders, and defines the training and certification requirements on use of force and firearms²⁰.

Initial firearm certification: New recruits and future armed employees receive the initial firearm training and certification by completing the Duty Firearms Course²¹ provided by the College, before they can be assigned into an armed role.

Firearm and defensive tactics re-certification:

Armed Employees must:

- successfully demonstrate their shooting proficiency every year during an Annual Qualification course
- successfully complete, every third year, the Recertification and Skills Maintenance refresher training on control and defensive tactics techniques from the Duty Firearms Course

Temporary extensions: Armed employees may be granted temporary extensions to extend their certification periods in certain circumstances.

Administrative removals: Managers are responsible for conducting an administrative removal of the firearm from employees whose certification expired, unless they were granted an extension until the next training event.

Annual qualification and three-year re-certifications

After an employee receives their initial firearm certification through the Duty Firearms Course, they must maintain their certification by completing the Annual Qualification and the Recertification and Skills Maintenance every three years. Managers are responsible for ensuring that armed employees under their supervision remain up-to-date with their certifications. The Canada Border Services College Satellite Campuses are responsible for arranging and delivering the re-certification courses, as well as ensuring that course outcomes are updated in CAS²².

The audit examined the processes established for ensuring that armed officers successfully complete the required training to remain certified.

²⁰ CBSA *Directive on Firearms and Defensive Tactics Training*; November 1, 2021.

²¹ The Duty Firearms Course is included in the Officer Induction Training Program for new recruits, and is also offered as a stand-alone course for existing employees.

²² CBSA *Directive on Firearms and Defensive Tactics Training*; November 1, 2021.

What the audit found

Processes to ensure that officers are certified to carry a firearm were established and effective.

- To be issued with defensive equipment, the record of the completed certification must be entered in CAS by the CBSA College.
- The Satellite Campuses monitored upcoming expirations of qualification and re-certification using CAS and, informed and requested regional managers to schedule training attendance.

Our reconciliation of training records to the entire inventory of issued firearms, showed that, on September 7, 2023, 93% of officers with an issued firearm successfully completed the annual qualification and the three-year re-certification within prescribed timelines.

- The remaining 7% of employees did not have records indicating completion of both courses within the prescribed period and were listed as being issued with a firearm. Those cases would require further review to determine whether their records are accurate and compliant with policy (our analysis under [What the audit found](#) included some cases).

During the COVID-19 pandemic, in-person training was temporarily halted, which created a backlog of expiring three-year re-certifications. The agency extended the re-certification cycle for the affected employees to four years. The agency was on track to return to the three-year cycle starting in 2024 to 2025.

We judgementally selected and reviewed in detail 20 files to assess the status of the training records against the CBSA training policy. In addition, we reviewed other measures taken for more complex cases.

Refer to [Appendix C](#) for sample selection.

What the audit found

Seventeen of the 20 files reviewed demonstrated that certifications were up-to-date.

- While training records for these 17 files were current, 3 of them revealed a problem in the inventory records of issued firearms in CAS:
 - Officers did not require a re-certification as they were no longer armed, but CAS had not been updated to reflect that employees no longer had their firearms (refer to [Inventory tracking in the corporate administrative system](#)).

The other 3 files reviewed showed that certifications were not current at the time of the test, or had not been up-to-date for periods of time in the training history. We could not find records of requests for extensions during those periods.

- Two officers had since completed their re-certification, but we could not confirm if temporary administrative removals had been performed during the time their certification was out of date because the agency did not log past administrative removals.
 - One officer was out of date with their annual qualification, awaiting training, and management confirmed that an administrative removal had not yet been performed at the time of our review.

Timely and accurate entries of inventory and training records, as well as centralized tracking of administrative removals would enable the agency to better monitor compliance with the Defensive Tactics training requirements.

Temporary extensions

In certain circumstances, management may request a temporary extension of an officer's authorization to handle a firearm beyond the expiration of their certification and until the next training event²³. The Satellite Campuses of the Canada Border Services College (referred to as Satellite Campuses) coordinate the requests between managers and the Defensive Tactics Unit (DTU) of the Force Generation and Strategic Direction Division. The DTU is responsible for approving or denying the requests and maintaining the extension request records.

The audit assessed the processes to grant temporary extensions as a secondary means for officers to maintain the authorization to carry a firearm. The audit team reviewed 10 extension requests.

What the audit found

The extension process is dependent on effective and timely communication and partnership between local management, the Satellite Campuses, and the DTU.

- The DTU granted risk-based exceptions informed by a case-by-case analysis of circumstances.
 - When they denied extensions, the DTU provided direction to conduct an administrative removal or prevent the re-issuance of the firearm.
 - The DTU did not perform additional checks to ensure removal was carried out; this accountability rests with local management.
- Our work indicated that delays in requesting or processing temporary extensions (refer to [Table 1](#) Service standards for temporary extensions) contributed to instances of temporary non-compliance with the training policy, where armed officers may have continued to carry their firearm without proper authorization.
 - Some examples highlighted that the regions did not send the requests in a timely manner, meaning that at that time, officers were already temporarily non-compliant with the training policy, and therefore not authorized to carry a firearm.
- Our review of data on extension records showed that the DTU has significantly improved its response times in 2023 to 2024, but experienced periods of time where it was not responding to extension requests in accordance with its service standard of five business days (refer to [Table 1](#) Service standards for temporary extensions).
 - In the summer of 2023, the DTU introduced an informal service standard for responding to requests in five business days, added a category in the intake process to prioritize urgent requests, and allocated a dedicated employee for assessing the requests.

²³ CBSA Directive on Agency Firearms and Defensive Equipment; November 7, 2023.

Table 1: Service standards for temporary extensions

Fiscal Year	Number of extension requests	Median response time (business days)	Percentage of cases that met the 5-day service standard (established in 2023 to 2024)
2021 to 2022	1,146	10	32%
2022 to 2023	1,340	6	35%
2023 to 2024 ¹	632	4	66%

Source: Data collected by the Defensive Tactics Unit, tabulated and presented by the Internal Audit Division
¹2023 to 2024 numbers are up to January of 2024.

Why this matters

There is a risk that officers continue to carry and use a firearm after their training has lapsed and without an extension authorizing them to do so.

Lack of monitoring and approval of extensions could increase the risk that officers continue to carry a firearm without authorization, exposing the agency to liabilities in the event of an incident.

Recommendation 2

The Vice-President of HRB should strengthen the oversight over the defensive tactics training certification by:

- a. centralizing the recording of and monitoring the conduct of administrative removals
- b. improving the submission and processing of temporary extension requests

Management response

The VP of HRB agrees with this recommendation and will strengthen oversight over training timelines, certifications and improve processing of extension requests. Once these processes are revised and finalized, the appropriate training and policy documents will be updated.

Completion date: April 2025

Use of force incident review and officer fitness to carry duty firearms

This section is divided into four subsections:

- Background
- Use of Force Incident Review Process
- Timeliness of Use of Force Reporting and Review Process
- Officer Fitness to Carry Duty Firearms

Background

Officers can use force to detain or arrest individuals, or to defend themselves in the course of their duties²⁴. Managers and employees have a collective responsibility for safety and security in the workplace, with regards to the appropriate use of force in the course of their duties²⁵. All use of force incidents must be reported for agency review to ensure that actions taken by employees remain aligned to policies and training²⁶.

Use of force: Armed Officers must select the use of force option that is the most reasonable intervention based on their assessment of risk, situational factors and exhibited behaviour, in accordance with the Incident Management Intervention Model. They must notify their management when force is used and report the incident in writing.

Managers must ensure that employees involved in or witnessing a use of force incident submit an incident report in a timely manner. They are responsible for implementing the corrective actions recommended by the review, if applicable.

Officer fitness to carry duty firearms: Armed Officers must comply with expected conduct and policy requirements. They must inform management if they are no longer safe to carry a firearm, if they become aware of conditions about themselves or their colleagues.

Managers are responsible for:

- conducting non-administrative removals of firearms, if they become aware of conditions requiring such removals in accordance with policy
- monitoring overall compliance with policies, code of conduct, or other behaviours and investigating breaches of these areas with support of relevant agency functions

Use of force techniques applied by officers may cause an injury or even death. In the event of a critical incident, the CBSA is obligated to immediately report it to the local police of jurisdiction. If an employee is injured, the agency must report the hazardous occurrence²⁷ to Employment and Social Development Canada.

Use of force incident review process

When CBSA officers are involved in or witness a use of force incident, they must submit a Use of Force Incident Report through the Incident Management Reporting System (IMRS), to detail the circumstances of the incident and actions taken by the officers. Once the reports are submitted and reviewed by local management, they must be reviewed by the DTU's qualified use of force instructors and other experts to ensure that force was used in accordance with CBSA policies and training²⁸.

The audit assessed whether processes were followed to report and assess use of force incidents involving a duty firearm in accordance with CBSA policy. The audit team examined a sample of 15 incidents involving a firearm.

²⁴ CBSA Policy on Use of Force and Defensive Equipment; November 7, 2023 and CBSA Directive on Use of Force and Reporting; November 7, 2023.

²⁵ CBSA Directive on Use of Force and Reporting; November 7, 2023.

²⁶ CBSA Directive on Use of Force and Reporting; November 7, 2023.

²⁷ [Hazardous occurrence investigation recording and reporting - Canada.ca](https://www.canada.ca/en/cbsa/services/reporting-hazardous-occurrence)

²⁸ CBSA Directive on Use of Force and Reporting; November 7, 2023 and CBSA SOP on Use of Force and Reporting; November 7, 2023.

What the audit found

The CBSA has implemented a rigorous process for reporting and reviewing of use of force incidents, which is clearly defined in the CBSA *Directive on Use of Force and Reporting*.

- The 15 incidents examined were documented in IMRS and reviewed by the DTU in accordance with policy.
 - When required, the DTU consulted with relevant subject matter areas.
 - For all 15 incidents, the use of force review concluded that officers were acting in accordance with the policy and training. In one case, more training was recommended to the officers to ensure they can use safer techniques in the future.
 - The DTU's reviews also identified opportunities to strengthen the program or the training curriculum in three cases. These improvements were to be pursued by affected stakeholders.
- In the fall of 2023, the DTU strengthened its monitoring over the implementation of corrective actions. After updating the Directive, the DTU started following up on corrective actions three months after recommendations were made. The DTU's tracking of recommendations showed that they were implemented by their expected date.
- The DTU prepared an internal annual report on use of force trends and results. Since 2022, they reported monthly on the reviews' status to Regional Directors General, and from 2023, to the President and the Vice-President of HRB.

Timeliness of use of force reporting and review process

The *Directive on Use of Force and Reporting* (the Directive) outlines the reporting and review process and the timelines to complete each step²⁹.

The audit assessed whether the CBSA met its use of force reporting and review timelines, and analyzed the IMRS data on the 51 use of force incidents involving a firearm, from April 2021 to August 2023.

Refer to [Appendix D](#) for Use of force incident reviews detailed process and timeliness.

What the audit found

The CBSA historically did not consistently meet the prescribed timelines for reporting and reviewing use of force incidents. Prior to 2023 to 2024, the median time to complete the process, from the initial reporting date to the closure of the review took 97 days to complete. Given this, the DTU took measures to improve the median time to report and review incidents and it now takes 71 days to complete.

Table 2: Timeliness of use of force reporting and review process

Phase	Policy expectation	Policy expectation met (in %)	Median time (in days)
Incident reporting (Stages 1 to 4)	Within 48 hours	12%	22 days
Incident review (Stages 5 to 9)	16 days	47%	31 days

Source: Data collected in IMRS, tabulated and presented by the Internal Audit team

²⁹ CBSA *Directive on Use of Force and Reporting*; November 7, 2023 and CBSA SOP on Use of Force and Reporting; November 7, 2023.

The DTU identified, assessed, and began mitigating the factors that impeded on the timeliness of the incident reporting and review process which included:

- collaborating with Information Science and Technology Branch to improve IMRS' access and functionalities
- strengthening its support and follow-up functions
- stabilizing its resource capacity for Use of Force incident reviews

Why this matters

Without timely reporting and review of incidents, the agency may fail to identify and rectify unsafe or inappropriate use of force behaviours in a timely manner.

This could lead to repeated unsafe or inappropriate use of force, ultimately causing harm to individuals and damage to agency's reputation.

Officer fitness to carry duty firearms

To ensure the safety of employees and their fitness to continue to carry a firearm, the agency policy suite includes a non-administrative removal³⁰ process. As part of this mandatory process, managers shall remove firearms from employees if they become aware of certain prescribed circumstances that could affect their fitness to carry it³¹.

The audit assessed what controls were employed by the agency to monitor officer conduct and ensure policy compliance.

What the audit found

- The non-administrative removal process defined in the agency's *Policy and Directive on Use of Force and Defensive Equipment* was clear and management understood their responsibilities.
 - Procedures and supporting guidance were established to determine how and when mandatory non-administrative removals must be conducted.
 - The DTU kept records of the non-administrative removals conducted by local management.
 - Management interviewed at the 15 selected sites expressed that they understood the circumstances in which a removal was required as per policy and their responsibilities for conducting the non-administrative removals if they became aware of such circumstances.
 - Most of them had performed a non-administrative removal, following the guidance provided in the policy suite.
 - They indicated that parts of the process were challenging and stressful, such as identifying the reasons, deciding on, and conducting the removal. To reduce the challenges and stress, managers noted that they obtained support from experienced colleagues and several resources offered by the agency in performing the non-administrative removal.

Tragically, there have been instances where employees have used the agency's defensive equipment for self-harm or suicide. The current policies identify a clear process for notifying the police and

³⁰ A non-administrative removal is the mandatory process of removing defensive equipment from an employee for determined circumstances, such as criminal charge for an offence; threats or actual violent behaviour towards others or threats to do harm to themselves; substance abuse; a medical condition that negatively influence the ability of the individual to possess, wear, or use defensive equipment; being under investigation for a matter involving the use of excessive force or assault; or for not being in the best interests of the agency to continue to carry or possess an agency firearm or defensive equipment.

³¹ CBSA *Directive on Agency Firearms and Defensive Equipment*; November 7, 2023.

Employment and Social Development Canada, but do not indicate the roles and responsibilities of the branches/regions beyond these steps. There is no direction on what further action should be taken to conduct an internal investigation of the event (if required) or review the agency’s policy and processes.

Refer to [Recommendation 1](#) for details.

Conclusion

The CBSA has established a foundational structure to oversee the use of duty firearms and ammunition. It implemented policies, directives and procedures to manage and monitor related activities. The agency’s controls over firearms and ammunition were effective and, for the most part, operating as intended to provide appropriate safeguards. Further, processes were established to ensure that armed officers remained qualified and re-certified to carry a firearm, including the granting of temporary extensions. The agency had mechanisms in place to review use of force incidents and respond to circumstances that could affect the officers’ fitness to carry firearms.

To maintain a safe environment with effective and consistent processes, improvements are required to update the Defensive Tactics policy and monitor its compliance. Addressing these areas will increase the rigour in processes and strengthen the agency’s activities and controls related to firearms and ammunition.

Appendix A: Risk assessment and audit criteria

A preliminary risk assessment was conducted during the audit planning phase to identify potential areas of risk as well as audit priorities, which were used to develop the audit objective, scope and criteria:

Risk statement	Line of enquiry	Audit criteria
Duty firearms and ammunition may not be properly tracked, controlled and safeguarded	1. Safeguarding and Inventory Tracking of Firearms and Ammunition	1.1 Adequate processes and practices to safeguard duty firearms and ammunition are established and functioning effectively. 1.2 The inventory of duty firearms and ammunition is tracked in accordance with policy and monitored to identify gaps.
Certification / re-certification to carry a duty firearm and extension requests may not be properly tracked to ensure officers are authorized to wear a duty firearm.	2. Certification / Re-Certification	2.1 Armed officers complete the prescribed training to be issued and permitted to carry duty firearms.
Measures to respond to and review use of force incidents that involve the use of a firearm may not be adequate.	3. Use of Force Incidents and Officer Fitness to Carry a Duty Firearm.	3.1 Processes are followed to report and assess officer fitness to carry a duty firearm and use of force incidents involving duty firearms in with CBSA policy.

Appendix B: Previous audits and assessments

CBSA Audit of Arming (2015): the audit found that governance over the Arming Initiative was well established; that duty firearms and ammunition selected in the sample were secured, inventoried and life-cycle managed appropriately; and that incidents related to duty firearms were reported, investigated, and acted on when necessary.

- The audit recommended to track non-conforming assets and to segregate duties of administrative staff in terms of having access to both firearms and ammunition.
- The recommendations were closed and validated by the Internal Audit and Program Evaluation Directorate in 2015 to 2016.

CBSA Evaluation of Arming (2017): the evaluation reported that over the implementation of the Arming Initiative, continuous improvements were made to Arming training and that the training programs were well-regarded. However, there were some challenges noted, such as a decline in the Skills Enhancement Course pass rates and the low rates of off-duty practice and related to operations and human resources.

- The evaluation recommended:
 - to enhance the understanding and application of the existing policy on the wearing and handling of protective and defensive equipment in all modes
 - improve mental health tools for managers and employees working in an armed environment and implement training initiatives to increase officer awareness of mental health
 - assess firearm training and skills maintenance, including qualification requirements, to ensure operational needs are met
- The recommendations were closed and validated by the Internal Audit and Program Evaluation Directorate in 2022 to 2023.

Appendix C: Sample selections

Storage and Inventory Tracking: the audit team selected 15 sites across the agency for examination. These factors were considered in the selection: mode, volume, stream of work, location/ remoteness of the site and coverage across the country. As a subset of these sites, the audit team also selected 8 sites for physical observation and testing.

Re-Certification and Temporary Extensions: to assess compliance with the agency's training policy, the audit team judgementally selected 20 files to review the accuracy of training records as of September 7, 2023, and determine their compliance with re-certification policy.

To assess the accuracy of temporary certification extensions and compliance with policy, the audit team judgementally selected 10 temporary extension requests processed by the DTU between 2021 to 2022 and 2023 to 2024 and specifically: five approved and five denied requests. These factors were considered in the selection: region of the request, timing of the request, circumstances of the request, results of the requests, and complexity of the cases.

Use of Force Incidents: to assess the adherence with CBSA policy, the audit team randomly selected 15 use of force incidents involving a firearm for the period between 2021 to 2022 and 2023 to 2024.

Appendix D: Use of force incident reviews

The stages and service standards for non-critical use of force incidents are listed below. Delays in service standards may occur if an incident is critical or involves a firearm, which requires an Incident Review Committee. Other reasons for delays include consultations with stakeholders, including Professional Standards, Labour Relations, Officer Powers/Officer Authorities, IMRS system issues or access issues, access to video/closed-circuit television, etc.

Within 24 hours of the Incident

- Stage 1 - Pending Review Supervisor/Manager: Officer(s) are required to enter their reports in the IMRS. DTU sends an email to provide the case number and the Border Services Instructor (BSI) responsible for the file.
- Stage 2 - In Review Supervisor/Manager: Once all reports are entered, the case is sent to a Supervisor/Manager for their immediate review.
- Stage 3 - Pending Acknowledgment Chief of Operations (COO): Once the Supervisor/Manager acknowledges the report, the case is sent to the COO/Assistant Director level for their acknowledgment.

Within 48 hours of the incident

- Stage 4 - Acknowledgement COO: COO/Assistant Director will acknowledge the reports.
- Stage 5 - Pending Review BSI: Once the case is acknowledged, it is sent back to the DTU, who is responsible for assigning a BSI to review the case.

Within 13 days of being assigned the report

- Stage 6 - In Review BSI: The DTU BSI assigned to the case will conduct a technical review of the incident and complete an Incident Review Report (IRR).
- Stage 7 - Pending Review NHQ: Once the review is completed by the BSI, they will send their review and officer reports to the DTU Manager for review.

Within 3 days of receiving the IRR

- Stage 8 - In Review NHQ: DTU Manager will review the IRR and complete the Management Review Report (MRR).

Final stages

- Stage 9 - Pending Review COO: Once MRR is complete, it is submitted to the COO/Associate Director where the incident occurred.
- Stage 10 - In Review COO: The COO/Associate Director reviews the package with the reports, IRR and MRR and acknowledges the recommendations/conclusions provided.
- Stage 11 - Review Completed: Case is considered closed. Case is tracked in the IMRS Working Table under Closed Cases. If any recommendations are made, DTU will track and follow up within three months of the incident.

Appendix E: Acronyms

ATT	Authorization to Possess, Transport or Store Firearms' (also called the BSF390 Form)
BSI	Border Services Instructor
CAS	Corporate Administrative System
CBSA	Canada Border Services Agency
COO	Chief of Operations
DEMU	Defensive Equipment Management Unit
DTU	Defensive Tactics Unit
HRB	Human Resources Branch
IRR	Incident Review Report
IMRS	Incident Management and Reporting System
MRR	Management Review Report
NHQ	National Headquarters
RCMP	Royal Canadian Mounted Police
SOP	Standard Operating Procedure
SPSD	Security and Professional Standards Directorate
TB	Travellers Branch