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# Audit of Investigator's Notes

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**Final Report  
January 2025**



Aussi disponible en français sous le titre : Vérification des notes de l'enquêteur

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# Access to Information Assessment

This report has been reviewed for potentially sensitive information. Where sensitive information has been removed, [REDACTED] appears; published information is UNCLASSIFIED.

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# ACRONYMS

ATAK	Android Team Awareness Kit
ATIP	Access to Information and Privacy
BWC	Body-Worn Camera
CAP	Contract and Aboriginal Policing
C&IP	Contract and Indigenous Policing
CPIC	Canadian Police Information Centre
CROPS	Criminal Operations
D/Commr.	Deputy Commissioner
EVE	Electronic Voice Entry
HQ	Headquarters
IAER	Internal Audit, Evaluation and Review
IM/IT	Information Management/Information Technology
IMM	Information Management Manual
IT	Information Technology
MCC	Mass Casualty Commission
NHQ	National Headquarters
NTOP	National Technology Onboarding Program
OM	Operational Manual
PDC	PROS Data Centre
PROS	Police Reporting and Occurrence System
RCMP	Royal Canadian Mounted Police
RM	Regular Member
RMS	Records Management System
SPS	Specialized Policing Services
ULQA	Unit Level Quality Assurance

## External Organizations

[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]



# EXECUTIVE SUMMARY

## Context

Regular Members (RMs) take notes throughout the course of investigations. These notes serve to refresh memory, justify decisions made and record evidence. Well documented notebook entries lend credibility to testimony and can substantiate information years after the occurrence. Inadequate and inaccurate entries in a notebook can compromise an investigation and/or subsequent prosecution.

Notes are subject to disclosure and examination by the courts in criminal, civil and administrative proceedings and may be accessed under the *Access to Information Act* and the *Privacy Act*. Upon departure from the Royal Canadian Mounted Police (RCMP), an RM's notebooks are retained by the organization.

## Audit Objective

The objective of this audit engagement is to provide assurance that the processes and practices used to maintain investigator's notes were adequate to ensure compliance with relevant policies to support investigations, corroborate evidence, and maintain the credibility of a RMs' testimony in court. The audit also assessed the implementation of the recommendations from the 2014 Audit of Investigator's Notes to determine if the issues raised in the former audit were satisfactorily addressed over the long term.

This audit was national in scope and covered the period between April 1, 2021 and September 30, 2023, and also included a forward-looking component.

## Audit Finding Themes

The audit findings can be grouped into three themes:

1. Recording key investigative information in notes;
2. Capturing, tracking and storing investigators' notes in formats that support operations; and,
3. Retaining investigators' notes and notebooks by the RCMP.



## Key Takeaways

Overall, the audit found that processes and practices in place to maintain investigator's notes are generally adequate to ensure compliance with relevant policies, support investigations, corroborate evidence and maintain credibility of a RM's testimony in court. However, it was noted that the issues identified from the 2014 audit persist and opportunities remain to improve information management practices relating to investigator's notes (physical and electronic).

RMs take a large amount of notes to support investigations, including written notes and electronic reports. Policy and training is in place to provide guidance on when notes should be taken and what they should contain. While audit testing found that note taking was generally compliant with policy, gaps exist with supervisory review as well as outdated tools that support note taking and review. This increases the risk that deficiencies in note taking will not be detected and addressed on a timely basis.

RMs have a variety of tools available to capture information relevant to an investigation including notebooks, electronic reports, digital recorders, and mobile phones among others. While these tools support relevant information being captured in a form that supports investigations, opportunities to modernize and enhance the efficiency of capturing this information were identified.

Significant deficiencies were noted with respect to the organization's retention of [REDACTED] RM notebooks. There are opportunities to increase guidance around the process of retaining notes and notebooks, as well as how and where they are stored to increase their utility to the organization and mitigate the risk of loss or unintentional destruction.

# MANAGEMENT RESPONSE

Contract and Indigenous Policing and Specialized Policing Services have reviewed the audit report and are supportive of its content and recommendations. Our teams will work collaboratively to develop and implement the Management Action Plans relating to the recommendations identified in this report with an overall objective of improving the processes and practices used to maintain investigator's notes and ensure compliance with relevant policies.

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# Approach



## Audit Objective

The objective of the audit was to provide assurance that the processes and practices used to maintain investigator's notes were adequate to ensure compliance with relevant policies to support investigations, corroborate evidence, and maintain the credibility of a RM's testimony in court. The audit also assessed the implementation of the recommendations from the 2014 Audit of Investigator's Notes to determine if the issues raised in the former audit were satisfactorily addressed over the long term. See Appendix A for audit criteria.

## Audit Scope

The scope of the audit assessed notes taken by RMs working in general duty contract policing, and also encompassed the operation of the Contract and Indigenous Policing (C&IP) policy centre within National Headquarters (NHQ), modernization initiatives related to electronic note taking, and document retention. The scope period was from April 1, 2021 to September 30, 2023.

Notebooks related to major cases, including C&IP and Federal Policing (FP) investigations, supporting notes by Specialized Policing Services (SPS) units, and notebooks specifically used for recording human source-related information were excluded from the audit. In addition, while audit procedures explored the usage of administrative notes by detachment commanders and Criminal Operations (CROPS) to support investigations, the audit did not focus on providing assurance in this area.

## KEY THEMES

The audit findings can be grouped into **3 key themes** that represent risk areas for the organization.

01

**Recording key investigative information in notes** (content of notes)

02

**Capturing, tracking and storing investigators' notes in formats that support operations** (document management)

03

**Retaining investigators' notes and notebooks by the RCMP** (document retention)

# AUDIT METHODOLOGY



## Interviews with RCMP employees

In person and video interviews were conducted with individuals and groups in a variety of areas within the RCMP:

- Policy Centres
- Information Management and Information Technology
- Key contacts in Federal Policing, C&IP, SPS
- Detachment Commanders
- Supervisors
- General Duty RMs
- CROPS representatives



## Interviews with Crown Attorneys

To gain an understanding of how issues with information sufficiency and retention may impact criminal proceedings, interviews were conducted with Crown Attorneys in the following provinces where site visits took place:

- Alberta
- Manitoba
- Prince Edward Island



## Questionnaire to RCMP CROPS Officers

An email questionnaire was sent to CROPS officers in all divisions, including Depot. This allowed the audit team to identify key risks and concerns related to investigators notes from a divisional perspective, as well as policy, processes, tools, and training around retention and storage of notebooks.



## Audit Testing / Data Analysis

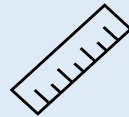
File testing was conducted on active notebooks and electronic reports associated with a sample of Police Reporting and Occurrence Systems (PROS) occurrences from 90 different RMs (30 from each of D, K and L divisions). This testing was performed in collaboration with a subject matter expert at the Staff Sergeant rank from the C&IP Operational Policy and Compliance Unit. In addition, training records on the AGORA note taking course were analyzed to assess how often the course was completed during the audit scope period. See Appendix C for summary of policy requirements for testing.



## Document Review

Internal documentation was reviewed, such as:

- Operational and administrative policies
- Unit level Quality Assurance (ULQA) guides
- Managerial review guides
- Training documents
- RCMP forms
- Infoweb pages



## Benchmarking

Benchmarking was conducted with [REDACTED] See Appendix D. This allowed the audit team to obtain an understanding of procedures in place around how notes are captured, stored, and retained by other police agencies.



## Site Visits

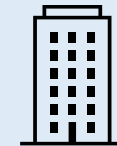
Site visits were conducted to allow for the physical inspection of notebooks as well as a walkthrough of detachments, divisional headquarters (HQ) and NHQ to review storage processes for [REDACTED] RM notebooks.



## Contract Divisions

Site visits were conducted at the following divisions and detachments:

- D Division (Manitoba) – Steinbach, St. Pierre-Jolys, Selkirk, DHQ;
- K Division (Alberta) - Strathcona, Beaumont, Leduc, KHQ;
- L Division (Prince Edward Island) – Queens, East Prince, Montague, LHQ.



## National Headquarters

An additional site visit was conducted at the following NHQ locations:

- M.J. Nadon
- Technical Police Operations Facility.

## Statement of Conformance

The audit engagement conforms to applicable standards in the Institute of Internal Auditor's International Professional Practices Framework and the Treasury Board of Canada Directive on Internal Audit, as supported by the results of the quality assurance and improvement program.



# Context

# INVESTIGATOR'S NOTES OVERVIEW (1/5)

## Background

Investigator's notes serve to refresh memory, justify decisions made and record evidence. Well documented notebook entries lend credibility to testimony and can substantiate information years after the occurrence. Inadequate and inaccurate entries in a notebook can compromise an investigation and/or subsequent prosecution. Policy, tools, training and supervisors play a vital role in ensuring the quality of note taking by investigators.

RMs must make written and/or electronic notes, as soon as possible during or after the occurrence, in order to prepare accurate, detailed and comprehensive notes articulating observations made and actions taken in the course of their duties. All notes made during an investigation are an integral part of an operational file and must be safeguarded appropriately. Investigators are required by policy to maintain a notebook in the course of their duties.

Notes are subject to disclosure and examination by the courts in criminal, civil and administrative proceedings and may be accessed under the *Access to Information Act*.

Upon departure from the RCMP, RMs are required to relinquish all notebooks to the commander at their last detachment or unit, given that police notebooks are the property of the RCMP. Currently, each unit, detachment or division has developed its own system for the storage, safeguarding and retention of notebooks [REDACTED].

## Policy

Operational Manual (OM) 25.2 Investigator's Notes is published on the Infoweb and was **last updated in 2017**, subsequent to the 2014 Audit of Investigator's Notes. This policy provides guidance on notes taken during investigations and includes provisions and requirements for hand-written notes and some additional instructions for electronic notes. It includes direction on the usage of the records management system (RMS), wireless devices, storage, retention and disposal of notes.

Various other operational and administrative policies and divisional supplements provide additional guidance on areas such as how long information must be retained, how to store notebooks, and specific information that must be captured in notes when a RM is investigating certain types of occurrences (e.g. Violence in Relationships), or performing certain actions (e.g. arrest).

## Training

The Cadet Training Program at Depot includes instruction on why notes must be taken, what to record, how to maintain notebooks and how to record electronic notes in the RMS.

This training is reinforced and built upon in the context of real-world policing through the Field Coaching Program, under the guidance of a Field Coach and the RM's Supervisor.

During the remainder of their career, RMs may receive further training related to investigative note taking through other non-mandatory courses:

- Note taking Course 001068: Between April 1, 2021 and December 31, 2023 – 1,092 RMs had taken and passed this course on AGORA.
- iM2U Member Notebook: Online course specific to E Division.
- Other specialized courses which have a note taking component (Part VI/Warrants, Human Source Courses, Major Crime Investigation Courses, etc.)

# INVESTIGATOR'S NOTES OVERVIEW (2/5)

## 2014 Audit of Investigator's Notes

In 2014, Internal Audit Evaluation and Review (IAER) conducted an Internal Audit of Investigator's Notes which examined this topic. The audit determined that investigator's notes were being recorded in a timely manner and were mostly compliant with policy; however, there remained room for improvement. These opportunities included:

- Enhancing supervisory review of notebooks.
- Enhancing guidance around using electronic reports as a replacement for handwritten notes.
- Additional guidance around retention of hardcopy notes and notebooks.

In response to the audit a Management Action Plan was created to address the recommendations, which was reported complete by Contract and Aboriginal Policing (CAP)\* and closed in 2015 by the Departmental Audit Committee.



## 2014 Management Action Plan

1. Deputy Commissioner (D/Commr.) CAP should identify and assess the risks that the absence of handwritten notes poses to the organization, and take appropriate action to mitigate those risks.
  - National policy on investigators notes was amended to include the provision to use electronic notes within RCMP approved devices and that they must be "locked" in the RMS by the RM. This was to be the only acceptable format for electronic investigator's notes.
2. D/Commr. CAP in collaboration with Commanding Officers should establish mechanisms to ensure that supervisory review has been completed and appropriately documented as per policy to address issues of non-compliance.
  - National policy on investigators notes was amended to change the requirement for supervisory review of notebooks from "monthly" to a "bi-annual" basis, along with updating the Performance Evaluation and Learning Plan form (2510) and instructions to document the assessment of the RM's notebooks.
3. D/Commr. CAP should assess and document the risks that the current retention and storage practices pose to the organization, specifically as they relate to RMs who retire or leave the RCMP and take appropriate action.
  - National policy on investigators notes was updated to state "Immediately, upon retirement or discharge, surrender all notebooks and other notes made in the course of employment which have not yet been added to an operational RMS, to the Detachment Commander or delegate at your last post".

As part of the current audit, the team assessed whether the actions taken were sufficient to address these issues.



# INVESTIGATOR'S NOTES OVERVIEW (3/5)

## Mass Casualty Commission

The Mass Casualty Commission (MCC) was a joint public inquiry created to examine the April 18-19, 2020 mass casualty in Nova Scotia and to provide meaningful recommendations to help make communities safer in the future. On March 30, 2023, the Commission delivered its final report to the Governors in Council of Nova Scotia and of Canada.

The MCC report included the following recommendation related to investigator's notes:

- (a) The RCMP, following the recommendation made by the Civilian Review and Complaints Commission, should implement training and supervisory strategies to ensure that all members take complete, accurate, and comprehensive notes.
- (b) The RCMP should develop an effective asset management process to retain, identify, store, and retrieve the completed notebooks of its members.
- (c) Canadian police agencies should evaluate front-line supervisors' oversight of front-line members' note taking as one criterion by which their performance is assessed.
- (d) Canadian police education programs should integrate effective note taking practices into every aspect of their curriculum – for example, by incorporating note taking skills and assessment into substantive assignments. (Volume 5, pages 609-610)

## Implementation Points

The Commission identified various implementation points for Canadian police agencies.

- All Canadian police agencies should adopt the practice of requiring front line members to provide their notebooks to their supervisor at the end of each shift for review and countersigning.
- Where necessary, electronic alternatives to these supervisory practices (e.g., scanning notebook pages for review and approval by a remotely located supervisor) can be adopted.
- The quality of an agency's note taking practices should be assessed both by compliance with notebook review policies and by the quality of members' note taking.
- Police notebooks should be stored in police detachments between shifts.
- When members are transferred, resign, or retire, their notebooks should remain at their detachment.
- Canadian police agencies should explore the potential for transitioning to electronic note taking in light of available technologies such as cellphone voice recognition note taking ability and the increased use of body-worn cameras. Regardless of the platform, the fundamentals of good note taking should be present, including the essential requirement of being able to ensure the integrity of records taken contemporaneously with the events they recount. (MCC Volume 5, page 610)

There is an opportunity to consider these points as part of the ongoing note taking modernization activities and in the development of the Management Action Plan in response to this audit.

# INVESTIGATOR'S NOTES OVERVIEW (4/5)

## Modernization in the RCMP

While there has not been significant modernization of the methods used to capture investigator notes on a national level, several activities directed at modernization have been identified (see table 1 below). Interviewees noted that a lack of funding and human resource capacity are impeding the progress of modernization initiatives at the national level, preventing them from launching into full-fledged projects. These challenges were also identified in IAER's Review of Major Transformation Initiatives.

By maintaining the status quo, the organization will continue to rely on physical notebooks for General Duty note taking. This will contribute to the ever-growing concerns of damaged or lost notebooks, the inability to easily access the information and increased costs of storing physical records.

**Table 1: Modernization activities related to investigator's notes**

Activity	Description	Status
Digital Notes Solution	Cloud-based platform that allows RMs to take real-time electronic notes (e-notes) on their devices, which are then directly placed into the RMS (e.g. PROS). This conceptual initiative does not have a dedicated team that is actively working on it. Notable issues include lack of funding and capacity.	Conceptual stage
OneDrive	Similar to digital notes, this is a Microsoft file hosting service intended for transitory storage of information such as notes. Notable issues include misalignment of retention periods with respect to investigator notes and challenges retrieving notes from the cloud.	Implementation in Progress
Digitization	Process of creating electronic scans of notebooks and saving them into a corporate repository or RMS (e.g. PROS). This conceptual initiative does not have a dedicated team that is actively working on it. Notable issues include lack of funding and capacity.	Conceptual stage
Body-worn Camera (BWC)	A BWC is an approved RCMP device that is worn on a designated RM's uniform in an overt capacity for the main purpose of recording audio and/or video. Video from BWCs do not replace proper note taking or reports. RMs are required to <b>complete note taking and reports before reviewing the body-worn video</b> .	Testing
Electronic Voice Entry (EVE)	<b>Municipal</b> service specific to Strathcona detachment in K division, that provides RMs with support on administrative tasks in PROS, Canadian Police Information Centre (CPIC) queries and preparing pre-charge packages. Although this service can also transcribe notes provided by RMs over the phone, it was noted that few RMs use this feature due to its unreliability.	Implemented
PROS Data Centre (PDC)	The PDC provides support to frontline RMs in certain divisions by completing their data entries for certain types of lower risk occurrences. This operational assistance helps reduce a RM's time spent in front of a computer so they can concentrate their efforts toward police investigations. PDC is not a pilot project intended for national roll out.	Implemented



# INVESTIGATOR'S NOTES OVERVIEW (5/5)

CONTEXT

## Comparative Analysis

As part of the audit, benchmarking was conducted to determine how the RCMP manages investigator's notes compared to other police organizations.

Although each police organization has differences in their size and geographic area relative to the RCMP, the way they manage information to support their investigations may provide value to the RCMP with respect to sufficiency of internal processes.

RCMP			[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Content of Notes	Numbering/ Labelling	<ul style="list-style-type: none"> <li>Police officer ID</li> <li>First/last entry dates</li> <li>Consecutive numbering system throughout service</li> </ul>	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
	Annual Supervisory Inspection Frequency	2	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Document Management	Active Storage	<ul style="list-style-type: none"> <li>Police officer responsible for storing all notebooks during the course of their employment</li> <li>location not specified</li> </ul>	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
	Relinquishment upon Departure	<ul style="list-style-type: none"> <li>All notebooks to be surrendered to Commander at last post</li> </ul>	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
	Long Term Storage	<ul style="list-style-type: none"> <li>Commanders to store notebooks in secure designated area, filed and indexed by regimental number and date order</li> </ul>	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Document Retention	Retention Period	20 years	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

# Key Findings

# SUMMARY OF ISSUES AND IMPACTS

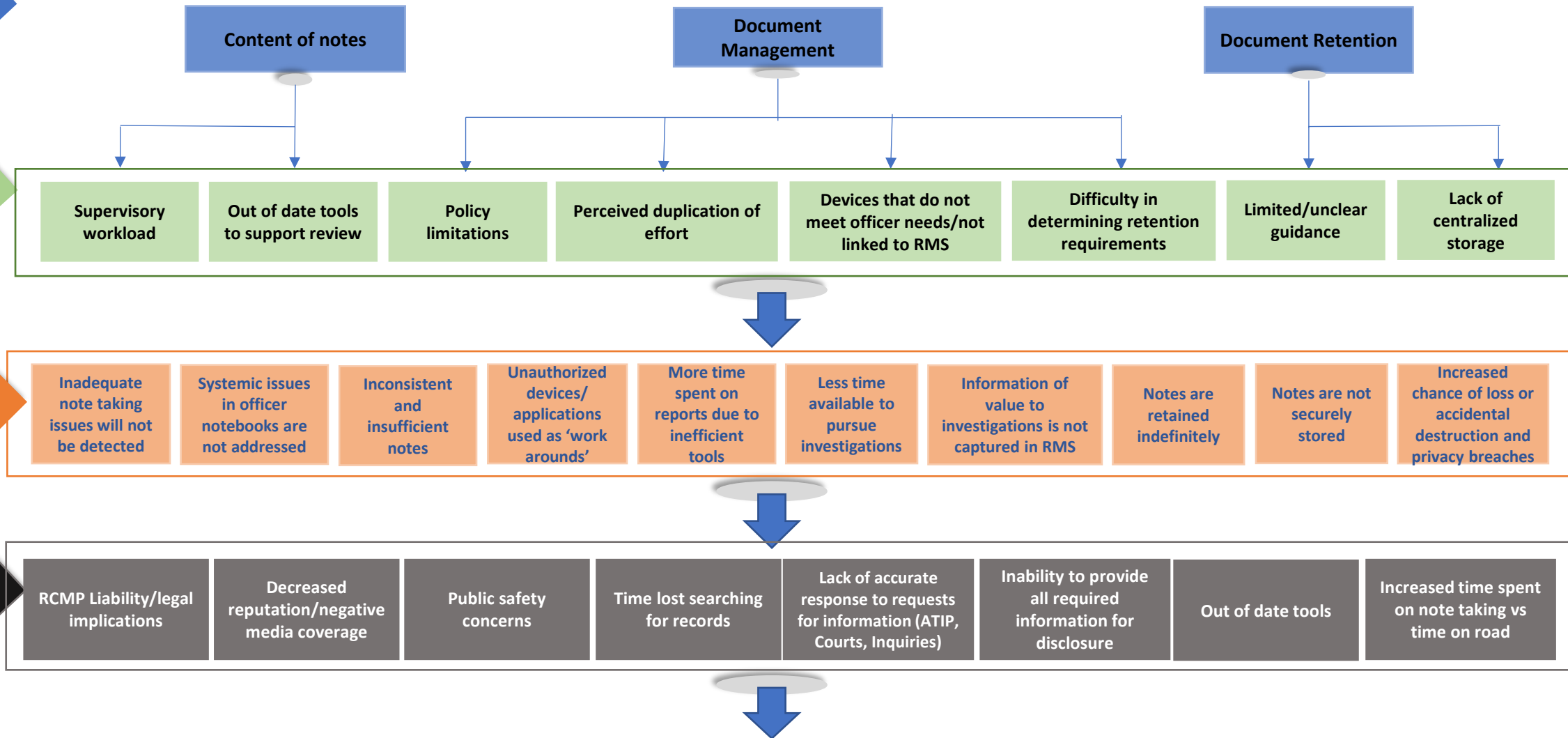
## KEY FINDINGS

Audit  
Finding Themes

Potential Root  
Causes

Associated Risks

Potential Impacts  
to the  
Organization



Insufficient, inaccessible or unavailable information to support RCMP investigations

**Finding #1:** Although policy and training is in place to support RMs in ensuring that sufficient information is captured in notes, there are opportunities to enhance supervisory review and related tools.



*You get burned on the stand once and quickly learn to fix the problems with your notes.*

[Many interviewees]



Capturing **factual, accurate, contemporaneous and complete** investigative **notes lends credibility to testimony** and can substantiate information years after the original entry was made. Conversely, gaps, blank spaces and missing information can adversely impact an officer's credibility in court.

### Policy and Training

Policy and training are in place to provide guidance for RM note taking during investigations. This includes:

- OM.25.2 Investigator's Notes, as well as various other operational policies, identify when notes should be taken and what type of information should be captured in notes.
- C&IP has drafted an update for OM.25.2, which is currently in the publication process. One proposed update specifies that electronic notes are not to be deleted or altered, but rather that a new electronic report should be created to highlight corrections required.
- Training at Depot and through field coaching reinforce how to take notes during investigations.

### Supervisory Review

As per OM.25.2, supervisors are required to review RM notebooks twice annually as part of performance reviews. Further supervisory review of notes takes place during the review of RM reports in the RMS and the disclosure process. For example, supervisors review scanned copies of notebook entries as well as electronic reports in advance of sending the disclosure package to court. This provides an opportunity to identify missing information in notes.

### Why it Matters

Policies and training are important to identify what is, and what is not acceptable in an organization. Gaps in policy and training can lead to inconsistent application or approaches which may negatively impact the quality and availability of investigator's notes.

Supervisory review of notes is a key step that enhances accountability and the overall effectiveness of police officer performance. It can be used to identify and correct deficiencies in notes that may impact an officer's credibility in court. Additionally, it can identify where refresher training may be needed.

Failure to mitigate the risk of police officers not taking notes can lead to consequences. These may include inaccurate documentation of incidents, hindrance to investigations and compromised legal proceedings. Also, incomplete or unreliable records may undermine the credibility of police officers.

Policy Findings

While policies are in place to support RMs taking notes during investigations, some gaps were noted. For example:

OM.25.2 includes provisions and requirements for hand-written notes and some additional instructions for electronic notes. Electronic notes may be completed on an approved RCMP-issued device and transferred to the operational RMS as soon as practicable. Policy also requires that they be locked in the RMS. In practice, this results in General and Supplementary reports being created in PROS.

- **GAP:** Some RMs have a practice of having an ongoing running log in their general report which contains multiple dates/events which they or their supervisors can modify.
- **RISK:** [REDACTED]

C&IP has drafted an update for OM.25.2, which is currently in the publication process. One proposed update specifies that electronic notes are not to be deleted or altered, but rather that a new electronic report should be created to highlight corrections required. This may help mitigate the above risk.



OM.25.2 also stipulates that the use of personal wireless devices for note taking or as an investigative aid (e.g. audio, video) is not permitted (other than in exigent circumstances).

- **GAP:** The majority of RMs interviewed stated that they use [REDACTED].
- **RISK:** The use of [REDACTED] could lead to data privacy breaches and non-compliance with information management/information technology (IM/IT) and information technology (IT) security policies and requirements.

Challenges were identified navigating between policies to identify the required retention periods for notebooks. For example, OM.25.2 redirects to Information Management Manual (IMM) 2.3, section 4.6.7 for the retention, storage and disposal of [REDACTED] RM notebooks.

- **GAP:** Neither of these policies provides direction or links to the notebooks retention period in IMM Appendix 2-3-1 Operational Codes – Investigator’s Notes, making it difficult for RMs and employees to find the “20 years after the RM is struck off strength” retention period.
- **RISK:** Difficulty in finding information on retention periods increases the risk of non-compliance with information management policies and requirements as well as complicating responses to access to information and privacy (ATIP) requests.

Three divisions developed a divisional OM.25.2 policy which is accessible on the Infoweb.

- **Note:** At the time of the audit, one division’s policy that had been updated in 2012 contained requirements that were no longer in alignment with the current policy, had broken links to other policies and a reference to the “Investigator’s Toolbox” which no longer exists. In addition, Divisional Information Management had not been consulted in its development, resulting in policy sections containing directions related to storage of [REDACTED] RM notebooks that could not be implemented. However, following the audit site visit, their policy was updated on the Infoweb and the identified issues were resolved.

The majority of RMs interviewed were aware that the policy on Investigator’s notes is on the Infoweb but rarely refer to it; instead they rely on peers and on-the-job training. RMs viewed the experience of testifying in court as the best way to understand the importance of good note taking; however, opportunities to attend court have become infrequent. Policy updates alone may not mitigate these risks.



## File Testing – Active Notebooks

Compliance testing was conducted on active notebooks associated with a sample of PROS occurrences, and included notes from 90 different RMs (30 RMs, in K, D and L Division).

Testing was performed in collaboration with a subject matter expert at the Staff Sergeant rank from the C&IP Operational Policy and Compliance Unit.

Compliance was assessed against key policy requirements in the Operational Manual which are detailed in Appendix B. As they are two distinct but related pieces of information, both the paper notes and electronic reports were assessed together.

The following findings took both electronic and hand-written notes into consideration.



## File Testing – Active Notebooks

Overall, testing results identified a high level of compliance with policy requirements.

- 85/90 (94%) notes reviewed were **recorded ‘contemporaneously’**, meaning that notes were recorded in notebooks or PROS roughly within 24 hours of when they occurred.

Interviews with Crown Attorneys identified that while there is not a specific time for when a note is no longer considered ‘contemporaneous’, notes taken significantly **beyond 24 hours may be viewed as having less value** by the court.

Additionally:

- 59/90 (66%) notes and reports **included all key information** such as the who, what, when, where, why, and how of the occurrence.
- Of those remaining, [REDACTED]
- Recording these key pieces of information is important for supporting RMs when providing testimony, as trials may take place months or years after the notes were taken. **Well-documented notebook entries lend credibility to testimony** and can substantiate information years after the original entry was made.

## Overall Assessment on Quality

An assessment was conducted on the quality of notes, and whether they would be sufficient to support testimony. Consideration was given to the totality of information captured in paper and electronic notes, versus policy requirements for the specific type of occurrence and the RM's role.

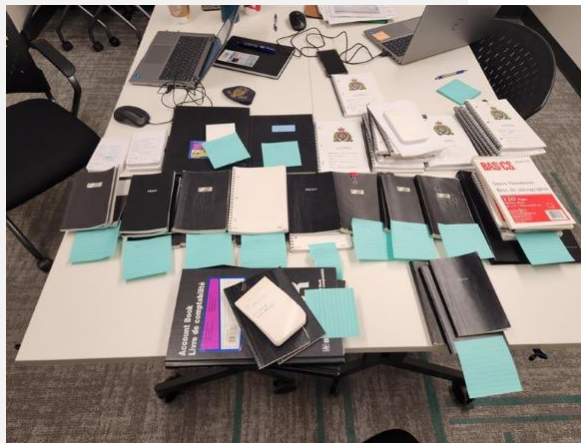
This opinion/ determination was made based on advice from the subject matter expert with results as follows:

- **(69/90) 77% of the notes would likely be sufficient to support testimony in court.**
- (16/90) 18% would likely experience some challenges in court due to perceived missing information (e.g. key details of arrest, statements made, relevant times involved, or no written notes).
- (3/90) 3% would likely result in RMs having difficulty testifying in court [REDACTED].
- (2/90) 2% could not be assessed as notebooks were not provided.

Failure to mitigate the risk of police officers not taking notes can lead to consequences. These may include inaccurate documentation of incidents, hindrance to investigations and compromised legal proceedings. Also, incomplete or unreliable records may undermine the credibility of police officers.

### Systemic Issues found during testing

While OM.25.2 includes specific requirements for information that should be captured during an investigation and when, it **also includes requirements** on how to take notes **within the notebook**, and identifies information to be written in the notebook. As a result, further testing was conducted on the paper notebook as a whole. Format and content of physical notebooks was also verified.



Key findings include:

- **Blank spaces and pages** that were not properly marked off were **observed in a small number of reviewed notebooks**. To avoid leaving blank gaps, policy requires RMs to cross-off unused portions of paper with a "Z", which the majority of RMs complied with.
- The majority of RMs stroked out and initialled corrections.
- **None of the notebooks reviewed had any missing pages**. Should pages be torn out of a notebook, challenges could be raised in court as to whether information was deliberately removed.
- All reviewed notebooks used blue or black ink as required by policy.

Interviews with [REDACTED]. While **gaps** in a notebook were **not necessarily viewed as detrimental** to a case, they can expose an RM to unnecessary challenges.



### Identifying Information

**Some notebooks had limited or no identifying information as required by OM.25.2**, such as the RMs name, regimental number or location, which could make it challenging to identify the notebook's owner. In addition, some notebooks were not numbered which increased the risk that a RM may not detect a missing completed notebook.

The MCC implementation points identified that the quality of an agency's note taking practices should be assessed both by compliance with notebook review policies and by the quality of members' note taking.



## FINDING #1 (continued)

## Supervisory Review Challenges

In response to the 2014 Audit of Investigator's Notes, OM.25.2 was updated to identify a **clear policy requirement for bi-annual supervisory review of notebooks** during mid-year and annual performance reviews. However, despite this requirement interviewees reported that in practice a wide variety of review schedules exist, from monthly reviews to no reviews of RM notebooks. In addition, while OM.25.2 requires that this review be documented in the supervisor's notebooks, supervisors stated that they did not record the review. **Failure to review RM notebooks increases the risks of policy non-compliance** not being detected and addressed.

OM.25.2 requires that upon reviewing a RM's electronic notes, a supervisor will document this in a supplemental report within the RMS. File testing identified that while evidence of review of electronic notes was found, a supplemental report was not always created. Some reviews were only documented in the (paper) disclosure package.

**RISK:** While **regular review of PROS files and disclosures mitigates the lack of notebook reviews** to some extent, it limits supervisors' ability to detect systematic problems in a RM's notebook, such as significant gaps or missing pages. Furthermore it limits opportunities to identify where refresher training may be needed by a RM during the course of their career.

While training is in place for note taking, it is **contingent on the individual RM to apply this training** throughout their career. **Supervisor review plays a role in ensuring compliance with policy and training principles.** While no training gaps were noted for investigator's notes, supervisors and detachment commanders noted that there was no formal training on reviewing RM notebooks.

The MCC recommended that the RCMP, following the recommendation made by the Civilian Review and Complaints Commission, should implement training and supervisory strategies to ensure that all members take complete, accurate, and comprehensive notes.

## Limitations of Monitoring Tools

In response to issues with supervision noted in the 2014 Audit of Investigator's Notes, the Performance Evaluation and Learning Plan Form 2510 was updated to document the requirement for supervisors to review RM notebooks during performance assessments. However, the **current Form 2510 on the RCMP Infoweb does not include the notebook review checkbox**, limiting the effectiveness of this control and potentially contributing to the lack of awareness of the bi-annual requirement to review notebooks.

Interviews with supervisors and detachment commanders stated that when deficiencies with notes were identified during reviews, they would start by having informal discussions with the RM. If the issues continued, they would document them through the performance assessment process. However, it was noted that performance deficiencies were only documented in severe or exceptional circumstances.

A Notebook ULQA guide exists which can help RMs and supervisors assess policy compliance of notes taken during investigations. One detachment had completed a Notebook ULQA within the last two years. In this instance, deficiencies identified during that ULQA were communicated across the detachment to remind RMs of note taking requirements.

While a **ULQA guide** is in place for notebooks, it **has not been updated since April 2012** and includes inaccurate policy references and tools. For example, it does not correctly identify the bi-annual requirement for review and documentation of notebook review. This **limits its effectiveness as a tool**, and increased the risk that it will not be used to enhance policy compliance.

## Recommendation #1

C&IP, in collaboration with relevant stakeholders (e.g. SPER, HR), should update policy, tools and guidance related to investigator's notes to address gaps identified in the audit, including:

- Enhanced guidance around the use of electronic notes/ tools, including use of applications.
- Update the Investigator's Notes ULQA guide.
- Ensure the Performance Evaluation and Learning Plan form (2510) on the Infoweb reflects the need to review notebooks bi-annually as part of performance reviews. This should include enhancing awareness of this requirement.

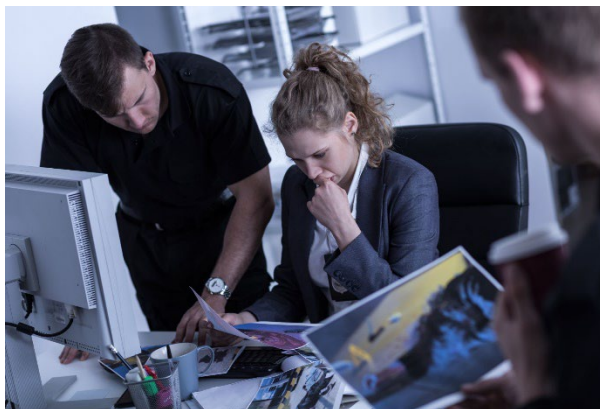
**Finding #2:** While RMs have tools to support relevant information being captured in a format that supports investigations, opportunities to modernize and enhance the efficiency of capturing this information were identified.

## Policy and Tools

In the context of investigator's notes for general duty policing, the **main tools for note taking** are the **small paper notebooks** carried by RMs and **electronic reports in the RMS**. Most divisions, including those the audit team attended for site visits, use PROS as their RMS (with the exceptions of the use of PRIME in E Division and Versadex in Halifax). Note taking practices have not changed significantly since the PROS roll-out in the early 2000s.

During interviews with general duty RMs, it was stated that notes were not often taken when a RM believes they did not have a significant involvement in an occurrence (e.g. they were not the arresting officer or did not otherwise play a key role). RMs stated that they are required to apply their professional judgement when deciding when to take notes and what to record. Therefore, policy does not define every situation in which notes must be taken, nor does it specify that every attending RM must take notes.

Interviewed Crown Attorneys noted that they expect all RMs who respond to calls or attend scenes to have some notes describing the circumstances of their role. They also added that **while RMs may perceive their roles as being minimal, details such as their observations, presence, and timing of events** could contain **key information for court proceedings**. In addition, prosecutions often have strict time limitations, and during cases all relevant notes must be provided to the court through the disclosure process. Crown Attorneys noted that delays caused by searching for notes of attending RMs that do not exist can negatively impact their ability to prosecute an offence.



## Why it Matters

Through the course of investigations large volumes of evidence is gathered, including notes. Effective document management ensures that documents of business value are organized, indexed and stored in a centralized system. This makes it easier for employees to capture and retrieve information quickly, saving time and increasing efficiency. In the context of investigations this allows officers to demonstrate that information was captured contemporaneously and supports the disclosure process.

Safeguarding and storage of notebooks is important to maintain the confidentiality and integrity of sensitive personal information. Proper storage prevents unauthorized access or loss of information, demonstrating accountability and commitment to protecting individuals' privacy rights as prescribed by the *Privacy Act*.

Adequate tools enhance efficiency, accuracy and the overall quality of law enforcement work. Adequate note taking tools are crucial for police as they help maintain accurate and detailed records.

## Tools for Note Taking

Currently front-line RMs are issued or have access to the following tools to assist with capturing investigative information:

- Paper notebooks
- Digital Voice Recorders
- Digital Cameras
- RCMP mobile phones
- In-car mobile workstation
- In-car video systems
- Audio/video recording equipment in interview rooms

## Challenges with Tools

While mobile devices have been provided, these devices do not have note taking features such as typing or voice to text with direct links to the RMS. RMs also noted in interviews that this, combined with IT security restrictions on the mobile phones, makes it very **cumbersome to transfer notes, information, photos or video** from their phone **to the RMS**. As a result, [REDACTED].

In some instances, challenges with the functionality, connectivity and ergonomics of the RMS in police cars have been raised by RMs, particularly in remote areas.

In addition, issues were identified with the Android Team Awareness Kit (ATAK) which rapidly drained batteries on some phones, further limiting their use in relation to note taking.



- Interviewed RMs are hoping that the roll-out of Body-Worn Cameras will reduce or even replace some note taking requirements.
- However the current BWC policy requires RMs to complete their notes before reviewing BWC video.

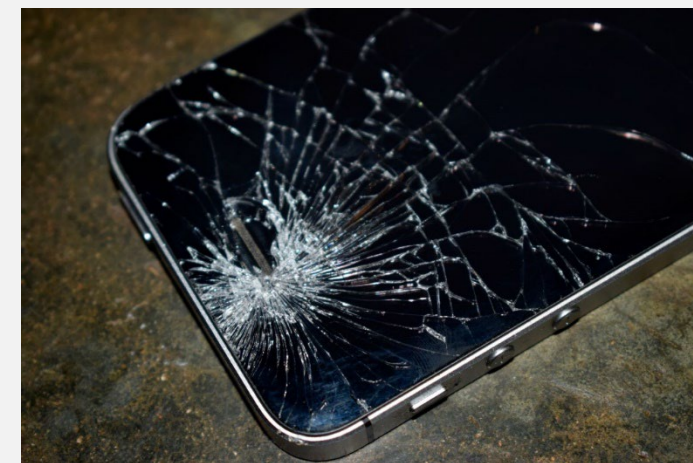
***"If it isn't in your notebooks, it didn't happen."***

[Every Detachment Commander, many RMs and some Crown Attorneys]

## Divisional Tools

Two additional tools were identified where RMs can dictate their notes/reports which will then be transcribed by a person and must subsequently be reviewed for accuracy by the RM. However, use of these systems was limited to certain detachments and were intended to be used for only certain types of occurrences, typically those of lesser severity.

- PROS Data Centre (PDC): The RM leaves a voice recording of their report following a predetermined script.
- Electronic Voice Entry (EVE): In this case the RM speaks directly to a person who transcribes the report.





## Tools – Perceived Gaps

While many RMs without access to such tools indicated that a voice to text system would **enhance their ability to complete reports efficiently** and allow them to **dedicate more time to other police duties** (e.g. investigations), interviews with RMs that had access to these transcription tools noted inconsistent usage, with some RMs using the tools regularly and others preferring to take paper notes and type their own reports.

When asked about perceived gaps in tools available, many RMs expressed a desire for an all-purpose mobile device, that would offer various methods of capturing information and the ability to directly add notes, images and documents to the RMS.

While **no clear gaps were noted with respect to tools** to assist note taking, tools which further enhance RMs ability to take notes in a time efficient manner, may improve quality, reduce duplication and allow for more time to be dedicated to other operational responsibilities.

Interviewed RMs indicated that they are not hoping for an additional device to add to their equipment, but would rather have one device that could perform multiple functions (typing, voice recognition, audio/video recorder, camera, texting) that links directly to the RMS.



Ongoing modernization efforts, including One Drive and digitization of notes may provide avenues to modernize note taking in the RCMP and mitigate the re-occurring challenges with notes identified in the audit.

The MCC identified that Canadian police agencies should explore the potential for transitioning to electronic note taking in light of available technologies such as cellphone voice recognition note taking ability and the increased use of body worn cameras.

## Opportunities for Modernization

There may be opportunities to enhance the ease of use of RCMP-issued mobile phones in the operational policing context. For example, a device that is perceived as more user-friendly and linked to RMS could reduce the risk of RMs [REDACTED] and enhance efficiency in note taking. This could include features such as:

- Enhanced functionality of work mobile (typed electronic notes, voice to text notes, easier method to transfer notes/images off the mobile).
- Linked to the RMS to transfer notes and pictures off the phone.
- Ability to take notes on phone and send to another RM.

While these new tools and functions may enhance investigative note taking and information management, it should be noted that they may also introduce new risks that will need to be assessed and mitigated. For example, increased usage of digital devices may increase cyber security risks, ability to detect when information is modified and acceptability by courts.

### Recommendation #2

C&IP, in collaboration with IM/IT and other relevant stakeholders (e.g. Legal, ATIP), should continue to assess the feasibility of modernization efforts related to investigator's notes. This should include:

- Consideration of sustainability of current practices and risks associated with information management.
- Alignment with other tools such as body-worn camera.
- Conducting cost benefit analyses, examining potential returns on investment, and consulting other police organizations that have modernized their note taking practices.

**Finding #3:** Significant deficiencies were noted with respect to the organization’s [REDACTED]. There are opportunities to increase guidance around the process of retaining notes, as well as how and where they are stored to increase their utility to the organization and mitigate the risk of loss or unintentional destruction.

## Storage of Active RM Notebooks

**Most RMs stated that they keep their completed notebooks at the detachment or** [REDACTED]. This is in compliance with policy requirements - that notebooks will be safely and securely stored at all times by each RM during the course of their employment.

When moving to a new posting, many RMs transport their notebooks directly to their new unit, however, some [REDACTED] due to distance and logistics of the move. One interviewed RM stated that [REDACTED] when he moved from a northern posting.

Secure storage is essential as notebooks may contain private information on members of the public that police interact with, as well as operational information.

## [REDACTED] RM Notebooks

OM.25.2 states that **RM notebooks are the property of the RCMP** [REDACTED]

Compliance testing was conducted on the notebooks of 102 RMs [REDACTED] Testing took place in detachments, divisional HQs and NHQ.

The results of file testing are illustrated in Figure 1. Of the 102 notebooks requested, [REDACTED]. The rationale for missing notebooks included a **lack of space in RCMP locations to store the notebooks** and **challenges recovering notebooks from** [REDACTED].

Figure 1 - [REDACTED]

## Why it Matters

Storage and retention of [REDACTED] RM notebooks is important to ensure that information of operational value is available and accessible when required. In addition, due to the content of the notebooks, this information must be secured and protected in accordance with privacy and security requirements.

To effectively use these records, the organization must know what records are available, where they are located, as well as the information contained in these records. This information must be effectively indexed to allow it to be searchable in an efficient and timely manner.

While secure storage is important, consideration needs to be given to environmental risks such as floods and fires. Given that the RCMP police numerous and remote locations, there may be an increased risk to information being lost to these types of threats.

File Testing – [REDACTED]

Overall compliance rates varied by division, as noted in Figure 2.

Interviews and walkthroughs of storage areas in **NHQ** identified **unique challenges with respect to** [REDACTED] not being aware of their responsibilities. This may **increase the risk of notebooks not being retained and stored correctly.**

It was very **difficult for the audit team to determine if all notebooks were returned** because they often indicated time periods covered [REDACTED] Interviews identified this as a challenge for supervisors, commanders and unit heads when they received notebooks from [REDACTED]

The audit team found **items that should not have been stored with the** [REDACTED] **RM notebooks,** [REDACTED]. **Notebooks belonging to other RMs were also found** mixed in with RM collection of notebooks. Interviewed **detachment commanders and unit managers indicated that they do not review the content of notebook packages** [REDACTED].

Figure 2 - [REDACTED]

Storage of [REDACTED] RM Notebooks

- IMM 2.3.4.6.7 requires unit commanders/delegates to store notebooks submitted by investigators in a secure designated area, filed and indexed by investigator regimental number and in order by date.
  - Auditors observed that [REDACTED] RM notebooks were being stored in various containers and locations, [REDACTED] These included:
- Containers:**

  - [REDACTED]
  - [REDACTED]
  - [REDACTED]
  - [REDACTED]
- Locations:**

  - [REDACTED]• [REDACTED]
  - [REDACTED]• [REDACTED]
  - [REDACTED]• [REDACTED]
  - [REDACTED]• [REDACTED]
- During interviews, unit managers and detachment commanders reported issues with not having enough space or proper storage to maintain the growing inventory of [REDACTED] notebooks. This resulted in them using varied storage locations as noted above.
  - K Division was the only division visited with a **designated centralized location to store all** [REDACTED] **notebooks.** However, as noted in Figure 2, this **did not fully address the risks** around the collection of all [REDACTED] RM notebooks.
  - Auditors observed only two locations where notebooks from [REDACTED] RMs were indexed on an inventory list and by name, regimental number, departure date and purge date. Other locations visited did not have a filing system other than names indicated on containers. This may limit awareness of retained notebooks and their location.

Retaining [REDACTED] RM Notebooks

- Appendix 2-3-1 of the IMM identifies that investigator notebooks must be kept for 20 years after they are struck-off-strength, notwithstanding further additional requirements for longer retention periods based on a variety of exceptions. Many interviewees were not aware of designated retention periods and purging requirements and as a result stored notebooks indefinitely, which may further contribute to storage constraints.
- While audit testing was focussed on a specific sample of [REDACTED] RM notebooks, the audit team observed [REDACTED]. Interviews with Detachment Commanders noted that obtaining [REDACTED] RM notebooks is a consistent challenge, particularly when [REDACTED].
- In addition, risks identified in NHQ locations around storage and retention of notebooks are likely to be exacerbated by modernization initiatives such as the new GC shared workspace standards which will further condense and consolidate units within the workspace.



The MCC recommended that the RCMP should develop an effective asset management process to retain, identify, store, and retrieve the completed notebooks of its members.



Recommendation #3

- C&IP, in collaboration with IM/IT, should strengthen information management practices around [REDACTED] RM notebooks, including:
- Enhance processes around collection of notebooks, including review of contents [REDACTED].
  - Improve how notebooks are stored to ensure compliance with security requirements, which may include centralized storage and tracking.
  - Ensure a standardized approach to indexing to ensure records can be efficiently found.

Opportunities to Consider

- Digitization of notes has the potential to mitigate storage risks and challenges related to the retrievability of information and life-cycle of [REDACTED] RM notebooks. For example, currently if the court requests a notebooks, the RMs last post must be identified, followed by a manual search through notebooks based on detachment and date range, if identified.
- Consideration should be given to consulting the National Technology Onboarding Program (NTOP) when assessing any new tools being considered to modernize how investigative notes are captured, retained and stored to ensure the new tools meet privacy, legal, policy, and ethical standards.
- Even if the RCMP eventually modernizes its note taking tools, **the management of physical notebooks will remain a requirement for the long term** given that RMs relinquish a large number of notebooks upon [REDACTED] and that their use will continue for some time.



# Additional Insight

# ELECTRONIC NOTES – Lessons from Other Police Organizations

Although a digital notes solution at the RCMP is still in a conceptual stage, two police organizations consulted as part of our audit had implemented or were in the process of implementing a digital notes solution.

The [REDACTED] highlighted the following benefits:

## Time Savings

- The biggest benefit was the time savings for front line officers. E-notes are integrated with existing systems so there is no need to scan notes to push them into the RMS.
- Based on proof of concept, [REDACTED] members saved an average of 1-3 hours per shift with digital notes. The [REDACTED] estimated the return on investment to be [REDACTED].

## Accuracy and Timeliness of Notes

- Members did not need to leave space in their physical notebooks to fill in notes, when responding to back to back calls. This improves the accuracy and timeliness of notes.

## Legibility and User Friendliness

- The Crown office appreciated [REDACTED] e-notes because they were legible, and more detailed than usual.
- [REDACTED] e-note solutions both had voice to text technology. Some officers also prefer to type on their phones.

## Search and Retrieval

- The retrieval of digital notes is more expedient. Some court cases can be delayed or wait for months for the [REDACTED] to find physical notebooks, or for officers to bring notes to prosecutors for disclosure.

The [REDACTED] also shared their challenges with respect to the implementation of digital notes within their organizations.

Their challenges were summarized into the following ten themes:



## Why it Matters

Modernization initiatives always entail upfront costs, but savings down the road in the form of less overtime for RMs, increased productivity, reduced turnover, reduced absenteeism, increased recruitment and retention must be considered when evaluating the total cost of an initiative.

# Conclusion

# CONCLUSIONS & KEY TAKEAWAYS

- Processes and practices in place to maintain investigator's notes are generally adequate to ensure compliance with relevant policies, to support investigations, corroborate evidence and maintain credibility of a RM's testimony in court. However, it was noted that the issues from the 2014 audit persist and opportunities remain to improve information management practices relating to investigator's notes (physical and electronic).
- Policy is in place and file testing identified that notes were generally compliant; however, some gaps were identified, including:
  - Retrieving, storing & purging of [REDACTED] RM notebooks
  - Supervisory review, and ULQA
  - [REDACTED].
- Modernization initiatives have the potential to address some of these concerns; however, actions should be taken to address the risks and issues noted in the interim.



# RECOMMENDATIONS

1

Given that the challenges noted in the 2014 Audit of Investigator's Notes still exist, and the MCC identified similar challenges, action needs to be taken to strengthen information management practices around investigator's notes. Due to the cross-cutting and multi-business line impacts of the ensuing recommendations, the Deputy Commissioner C&IP should engage and collaborate with relevant operational and enabling Business Lines to determine the how to best address the findings and related risks. In addition, the recommendations should be addressed in consideration of the RCMP's response to the MCC findings and recommendations. It is recommended that:

C&IP, in collaboration with relevant stakeholders (e.g. SPER, HR), should update policy, tools and guidance related to investigator's notes to address gaps identified in the audit, including:

- Enhance guidance around the use of electronic notes/ tools, including use of applications.
- Update the Investigator's Notes ULQA guide.
- Ensure the Performance Evaluation and Learning Plan form (2510) on the Infoweb reflects the need to review notebooks bi-annually as part of performance reviews. This should include enhancing awareness of this requirement.

2

C&IP, in collaboration with IM/IT and other relevant stakeholders (e.g. Legal, ATIP), should continue to assess the feasibility of modernization efforts related to investigator's notes. This should include:

- Consideration of sustainability of current practices and risks associated with information management.
- Alignment with other tools such as body-worn camera.
- Conducting cost benefit analyses, examining potential returns on investment, and consulting other police organizations that have modernized their note taking practices.

3

C&IP, in collaboration with IM/IT, should strengthen information management practices around [REDACTED] RM notebooks, including:

- Enhance process around collection of notebooks, including review of contents [REDACTED].
- Improve how notebooks are stored to ensure compliance with security requirements, which may include centralized storage and tracking.
- Ensure a standardized approach to indexing to ensure records can be efficiently found.

# Appendices

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# APPENDIX A – AUDIT OBJECTIVE AND CRITERIA

## AUDIT OBJECTIVE:

The objective of this audit engagement is to provide assurance that the processes and practices used to maintain investigator's notes are adequate to ensure compliance with relevant policies to support investigations, corroborate evidence, and maintain the credibility of a RM's testimony in court. The audit will also assess the implementation of the recommendations from the 2014 Audit of Investigator's Notes to determine if the issues raised in the former audit were satisfactorily addressed over the long term.

Criterion 1: Employees are provided with appropriate policy, training, and tools to support the discharge of their responsibilities for investigative notetaking.

Criterion 2: Investigative notes and the management of notebooks, including their capture, protection, retention, storage and disposal, are compliant with relevant policies and privacy considerations.

Criterion 3: Monitoring and oversight mechanisms related to investigative notes are in place.

Criterion 4: Modernization opportunities relating to how investigative notes are captured, protected, retained, stored and disposed are being considered to improve the effectiveness and efficiency of these activities.



# APPENDIX B – MANAGEMENT ACTION PLAN (1/3)

Recommendation	Responsibility	Planned Action	Diary Date
1. C&IP, in collaboration with relevant stakeholders (e.g. SPER, HR), should update policy, tools and guidance related to investigator's notes to address gaps identified in the audit, including:	C&IP, Officer In Charge (OIC) Operational Policy & Compliance (OP&C)	<p>Agree</p> <p><b>1. a)</b> To fully address the recommendation, Contract and Indigenous Policing (C&amp;IP) completed the following steps: C&amp;IP conducted a fulsome review of the National Operational Policy "OM 25.2 Note Taking".</p> <p>Policy amendments included a new definition of Electronic Notes as well as additional guidance on the handling of electronic notes, such as the use of approved RCMP-issued electronic devices, exceptions, and protocols to correcting, transferring to a RMS, vetting, disclosing and locking notes.</p> <p>This work is also aligned to the Mass Casualty Commission recommendation P71 which outlines strengthening members' notetaking practices.</p>	Completed April 2024
<p>a) Enhance guidance around the use of electronic notes/ tools, including use of applications.</p> <p>b) Update the Investigator's Notes ULQA guide.</p> <p>c) Ensure the Performance Evaluation and Learning Plan form (2510) on the Infoweb reflects the need to review notebooks bi-annually as part of performance reviews. This should include enhancing awareness of this requirement.</p>	C&IP, OIC OP&C and SPER, Director, Compliance and Innovation, Policy, Innovation and Review Programs Branch	<p><b>1. b)</b> C&amp;IP, in collaboration with SPER will update the Investigator's Notes ULQA review guide to align with the recently-amended Note Taking Policy in OM.25.2.</p>	April 2025
	CHRO, Director of HR Business Intelligence and Transformation, and Director of Corporate Staffing	<p><b>1. c)</b> A review and update of Form 2510 is underway in collaboration with the divisions, various business lines and internal services to enhance professional development and career management. The bi-annual review of notebooks as part of the performance review will be noted in the revised form.</p> <p>In addition, a review and update of the Career Management Manual will also be conducted. New tools and guidelines emphasizing the need to review notebooks bi-annually as part of performance reviews for regular members will be developed to support manager implementation. A communications plan will be created to launch the new form nationally on the RCMP Infoweb following pilot testing. The Infoweb page will also provide a centralized location where management and employees can refer to for guidance.</p>	April 2025

# APPENDIX B – MANAGEMENT ACTION PLAN (2/3)

Recommendation	Responsibility	Planned Action	Diary Date
<p>2. C&amp;IP, in collaboration with IM/IT and other relevant stakeholders (e.g. Legal, ATIP), continue to assess the feasibility of modernization efforts related to investigator's notes. This should include:</p> <p>a) Consideration of sustainability of current practices and risks associated with information management.</p> <p>b) Alignment with other tools such as body-worn camera.</p> <p>c) Conducting cost benefit analyses, examining potential returns on investment and consulting other police organizations that have modernized their note taking practices.</p>	SPS, Director General (DG) Analytics, Data and Information Management (ADIM) and C&IP, OIC OP&C	<p>Agree</p> <p><b>2. a)</b> IM/IT ADIM will create an action plan, in collaboration with C&amp;IP, with proposed mitigation strategies for each identified risk related to the lifecycle management of investigator's notes. Senior Management will be presented with the mitigation options for decision(s) on implementation.</p>	March 2025
	C&IP, Director Operational Systems Services Centre (OSSC) and SPS, DG ADIM	<p><b>2. b)</b> IMIT and C&amp;IP will collaborate to identify capabilities and opportunities to modernize investigator information/notes as well as end to end lifecycle management of that information across the RCMP. This will include a recommended toolkit for notetaking that addresses contemporaneous notes, such as those collected during investigations.</p>	Capabilities and Opportunities – July 2025
		<p>C&amp;IP has a number of technologies that support modernized evidence gathering, such as for body-worn cameras, as well as the upcoming PROS UA transformation which has digital notes functionality built-in. In order for the digital notes functionality to exist, the PROS UA transformation requires a number of iterative solutions to be completed including system upgrades and configuration of processes/workflows. This work will also feed into the Computer Aided Dispatch Next Generation Project and will include training, implementation and potential future procurements as the RCMP updates its contract policing systems. Operations Systems Services Centre (OSSC) regularly consults with other agencies such as OPP, to discuss modernization practices.</p>	Iterative solutions – July 2025
	C&IP, Director OSSC	<p><b>2. c)</b> OSSC recognizes and will continue to gather evidence of the significant benefits of modernized note taking capabilities through its consultations with other police organizations and informal scans of emerging technologies. The benefits are beyond a cost benefit analysis and the RCMP is expected to move in these directions as a result of numerous mandate directives, both internal and external. The “roadmap” for note taking modernization is already well established in other agencies, and the best practices have centred on integration with an agency's record management system (RMS). To that end, OSSC is currently ramping up a team that will deliver an upgrade to the PROS RMS that will include a digital notes function. This work will provide an evolutionary path to modernizing how RCMP members take notes and conduct investigations, and will be phased in over the next several fiscal cycles. This project's results will inform a natural development cycle of modernized note taking across the RCMP's divisions, with modernization somewhat dependent on external factors such as technology and infrastructure, client (Crown) acceptance, and technical support.</p>	<p>Toolkit created – December 2025</p> <p>Project team established to deliver upgrade to the PROS RMS – Fall 2024</p> <p>OSSC will continue consultations with other police organizations with a focus on digital notes and the Universal Application – May 2025</p>

# APPENDIX B – MANAGEMENT ACTION PLAN (3/3)

Recommendation	Responsibility	Planned Action	Diary Date
3. C&IP, in collaboration with IM/IT, should strengthen information management practices around [REDACTED] RM notebooks, including:	SPS, DG ADIM	Agree <b>3. a)</b> IMIT ADIM in collaboration with C&IP will develop procedures for the enhanced end to end lifecycle management of investigator's notes in alignment with policies identified in section 1 and outcomes from section 2 of the MAP. C&IP will apply a policy centre and subject matter expert lens to assist ADIM in lifecycle management of investigator notes.	Interim enhancement to guidance and practices – July 2025  Guidance and processes aligned to toolkit identified in 2.b - December 2025  Advanced guidance and practices aligned to modern capabilities and solutions – May 2026
a) Enhance process around collection of notebooks, including review of contents ([REDACTED]).	SPS, DG ADIM	<b>3. b)</b> IM/IT ADIM, in collaboration with C&IP, will prepare an options analysis for senior management consideration, including costs, for the storage and management of investigator's notes, including, but not limited to centralized storage and digitization.	Option analysis completed - July 2025  Recommendations to SEC – October 2025  National direction/guidance issued – December 2025
b) Improve how notebooks are stored to ensure compliance with security requirements, which may include centralized storage and tracking.	SPS, DG ADIM	<b>3. c)</b> IM/IT ADIM in collaboration with C&IP will develop enhanced metadata guidance for investigator's notes (day forward) for both physical and electronic notes. This will enhance existing policies and guidelines on notebook metadata and include options for advanced capture through solutions identified in section 2 of the MAP above.	Finalized enhanced metadata standards for notebooks – July 2025  National communications, awareness and/or training provided - December 2025  Metadata standards integrated within modern investigator note solutions – May 2026
c) Ensure a standardized approach to indexing to ensure records can be efficiently found.			

# APPENDIX C – SUMMARY OF POLICY REQUIREMENTS FOR COMPLIANCE TESTING (ACTIVE NOTEBOOKS )

Operational Manual 25.2 – Investigator's Notes	Operational Manual 18.1 – Arrest and Detention
Notes taken as soon as practicable (contemporaneous/24 hours) OM 25.2 1.2	Reason for Arrests and Detentions OM 18.1.3.1.1.6
Investigator's notes thoroughly describe the details of the occurrence and answer: who, what, when, where, why, and how OM.25.2.3.1	Right to be informed promptly of the reasons of arrest or detention - Section 10 (a) Canadian Charter of Rights and Freedoms (CCRF)
Professional language used (unless quoting) OM 25.2. 3.2	Response to 10a captured
Notes are factual and descriptive enough to explain decisions OM 25.2 3.3	Right to Legal Counsel – Section 10(b) CCRF
Sketches and measurements are included OM.25.2 3.4	Response to 10b captured
PROS Evidence of supervisory review OM.25.2.4.2.3	Police Caution
Dark blue or black ink was used OM 25.2 3.5	Response to Police Caution captured
Deletions stroked out and initialed OM 25.2 3.6	It was documented that counsel was not monitored? OM 18.1.3.1.1.8.2.1
Unused portions properly Z lined off OM 25.2 3.7	The time and details in relation to the arrest, advising the detainee of their rights and provided access to counsel were recorded in notes OM 18.1.3.1.1.9
Human source information was not included OM 25.2 3.8	If person suspected to have ingested a substance not made for consumption & brought to a medical practitioner, was it recorded in notebooks as well as name of medical practitioner? OM 18.1. 3.3.1.8
Notebook is bound with printed, pre-numbered pages OM 25.2 4.1.1	<b>Operational Manual 5.2 - Impaired Operation Investigations</b> For impaired investigations, RM noted circumstances of mandatory alcohol screening ASD demand such as the original reason for stop and other relevant information? OM 5.2. 3.2.3
Only one notebook used at a time OM 25.2. 4.1.4	
Name, regimental number, work location, start and end dates are on front cover OM 25.2 4.1.5	<b>Operational Manual 22 – Exhibits</b> For exhibits, detailed description of exhibit, location seized from, date and time seized in notebook? OM 22.1.3.1.1.2
A consecutive numbering system is used to record the number of notebooks used? OM 25.2 4.1.6	
All pages in notebook are accounted for OM 25.2 4.1.8	<b>Operational Manual 39.2 – Arrest – Young Person</b> If youth, was parent or guardian contacted? OM.39.2.2.1

# APPENDIX D – BENCHMARKING QUESTIONS

## Benchmarking Partners

- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

1. Are your police officers required by policy to record investigation notes? If yes, how are these notes captured (for example, hand-written in physical notebooks, entered directly in electronic systems, audio recorded notes, voice to text)?
2. What are the controls around the issuance, retrieval, storage and disposal of physical investigator's notebooks?
3. On average, approximately how many notebooks could a police officer in your organization go through in their career? How long should they be retained for? Who is responsible for retaining them?
4. Do you have policies and procedures around indexing, tracking and/or organizing investigators' notebooks, to facilitate the potential search of specific notes related to investigations or court disclosures that may arise in the future? If yes, could you please share these policies and procedures.
5. Do you have any planned or ongoing initiatives to modernize investigator notes in your organization? If yes, please briefly describe these initiatives.