

Review of Uniform and Dress Manual Policy Changes

Assessment of the controls in place for recent policy changes to the Uniform and Dress Manual and identification of potential risks

Final Vetted Report

November 2023



Royal Canadian Mounted Police
Gendarmerie royale du Canada

Canada

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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



| | |
|---------------------|-------------------------------------------------------|
| AIM | Action, Innovation and Modernization |
| CM&C | Corporate Management and Comptrollership |
| C/S/M | Corps Sergeant Major |
| DC, C&IP | Deputy Commissioner, Contract and Indigenous Policing |
| EALM | Equipment and Asset Lifecycle Management |
| FAA | Financial Administration Act |
| FY | Fiscal Year |
| MOA | Memorandum of Agreement |
| MOU | Memorandum of Understanding |
| NPF | National Police Federation |
| NSO | National Standing Offer |
| TEAM | Total Expenditures and Asset Management System |
| RCMP | Royal Canadian Mounted Police |
| SBA | Soft Body Armour |
| UDM | Uniform and Dress Manual |
| UEC | Uniform and Equipment Committee |
| UEP | Uniform and Equipment Program |
| UESC | Uniform and Equipment Sub-Committee |

Executive Summary

Background

The RCMP provides members with the necessary articles of approved uniform items for their assigned function, which they wear in accordance with the relevant operational needs, health and safety requirements.

Directives on uniforms are contained in the Uniform and Dress Manual. Chapters 2 to 8 fall under the responsibility of the Uniform and Equipment Program within Corporate Management and Comptrollership. Chapter 1 is the responsibility of the Corps Sergeant Major, who, supported by Warrant Officers, provides guidance on grooming to ensure that matters pertaining to the orders of dress, ceremonial protocol, and state occasions are adhered to by members.

In November 2020, the Commissioner made a joint decision with the National Police Federation to allow members the flexibility to select and purchase their choice of cargo pants for reimbursement. Also the reimbursement amount for boots was increased. The modernization of uniforms is continuing with the current initiative to update the uniform duty shirts.

Why This is Important

As the environment in which police operate is continually changing, the RCMP must adapt to new demands and challenges to fulfill its mandate and promote workplace diversity. Risks associated with officer and public safety must be considered.



Review Objective and Scope

The Review examined the controls related to changes to the Uniform and Dress Manual and assessed the impact of risks to the RCMP such as officer impersonation, and officer and public safety.

The scope focused on the impact of the policy changes and the related implementation for the period of April 1, 2019 to December 31, 2021.

Findings Highlights

- Processes are in place for the issuance, reimbursement and disposal of uniform items but procedures are not being consistently followed. Enhancing the controls over the reimbursement process and clarifying disposal requirements would facilitate compliance with uniform policies.
- Unit Commanders and Commanding Officers do not consistently enforce the standard uniform requirements and purchase non-approved uniform items. There is an opportunity to strengthen adherence to the Uniform and Dress Manual.
- Members are dissatisfied with the pace of modernization for the uniform duty shirt and the September 2022 update did not provide expected completion dates.
- [REDACTED]
- Consideration should be given to strengthening compliance with the Uniform and Dress Manual while providing RCMP members with uniforms that are functional and which meets their diverse needs for comfort, health and safety.

Next Steps

The management response and action plan developed in response to this report demonstrate the commitment from senior management to address the review findings and recommendations. RCMP Internal Audit Function and Departmental Audit Committee will monitor the implementation of the management action plan and undertake a follow-up audit if warranted.

Recommendations

The RCMP should:

- 1 With respect to the RCMP Regulations:
 - a. [REDACTED] identify options for how to address reimbursement, taking into consideration that members have the uniform items required to perform their work.
 - b. determine the short-term and longer-term options to align policies with the RCMP Regulations, taking into consideration a risk-based phased approach.
- 2 Conduct a detailed assessment of the purchases by acquisition card and invoices to identify the extent of non-approved uniform items and equipment purchases and develop a mitigation strategy to address the risks posed.
- 3 Review current organizational practices with a view to strengthen uniform policies while responding to equity, diversity and inclusion needs of Regular Members to:
 - a. ensure compliance with entitlements and delegated financial authorities for reimbursement and purchase of uniform items.
 - b. ensure adherence by members to uniform requirements to maintain a consistent general duty uniform across the RCMP.
 - c. [REDACTED]



Management's Response

Corporate Management & Comptrollership (CM&C), Contract and Indigenous Policing (C&IP), Reform, Accountability and Culture (RAC), and the Corps Sergeant Major agree with the findings and recommendations in the Review of Uniform and Dress Manual Policy Changes report and support the areas identified for improvement. Our respective areas will work together and will engage other stakeholders, including diverse employee groups and bargaining agents, as appropriate, to support the development of a detailed action plan to address the report recommendations, including specific timelines and milestones.

Samantha Hazen
Chief Financial Officer

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Deputy Commissioner, Contract and Indigenous Policing

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Senior Assistant Deputy Minister, Reform, Accountability and Culture

Al McCambridge
Corps Sergeant Major



Overview

Modernization

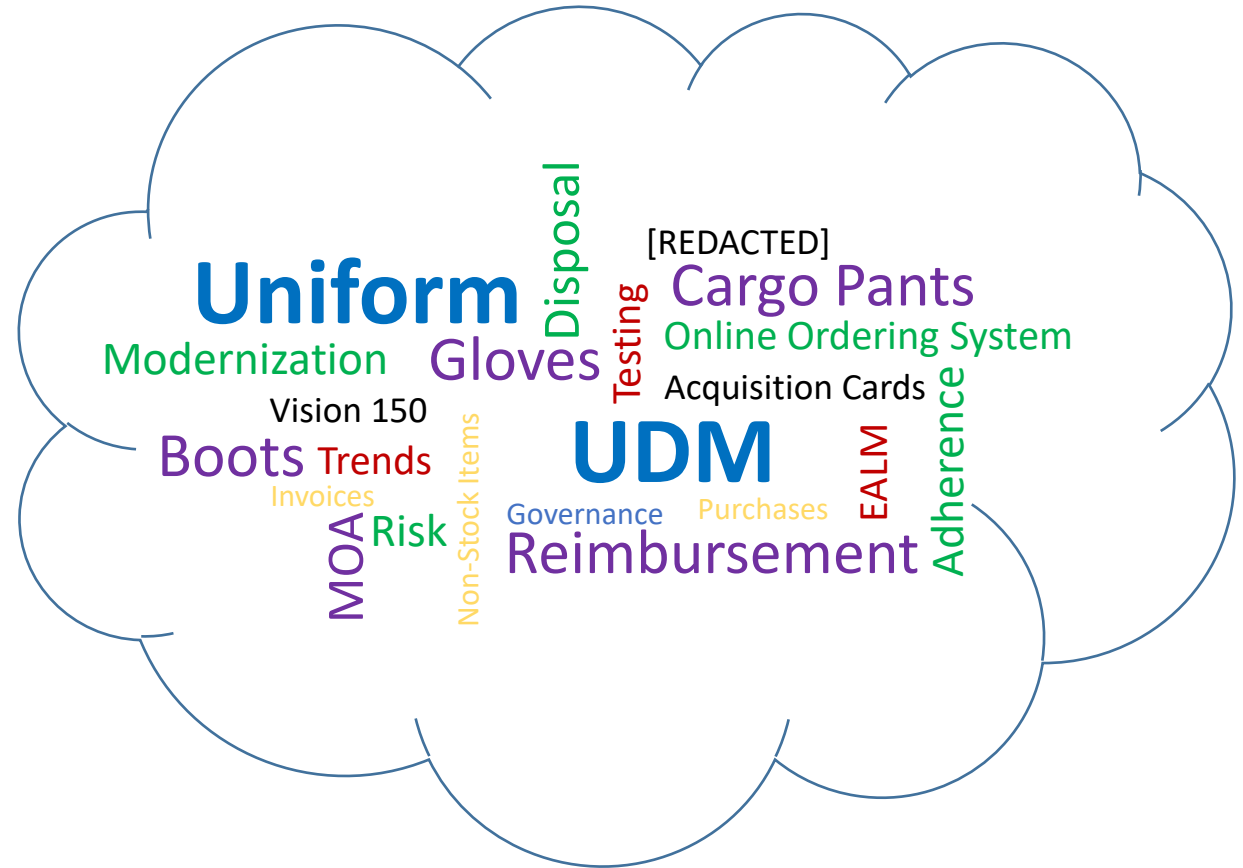
Uniform Trends

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for Uniforms

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Context of the Review

- An Audit of Uniform and Equipment was approved by the Commissioner as part of the 2021/22 to 2025/26 Risk Based Audit and Evaluation Plan.
- Based on the work conducted by the internal audit team in the planning and conduct phases, it was determined that a review would be better suited to provide senior management with relevant evidence-based information related to uniform policy changes.
- In consideration of the risks and organizational sensitivities related to the uniform identified in the early stages of the conduct phase, in July 2022, the Chief Audit and Evaluation Executive elected to proceed with the work as a review rather than an audit. As a result, the engagement title was modified to the Review of Uniform and Dress Manual Policy Changes.
- The Review is intended to provide senior management with an assessment of the controls and impact of risks related to changes in the Uniform and Dress Manual (UDM).



Approach

Objective

The objective of the Review was to examine the controls related to changes to the UDM and assess the impact of risks to the Royal Canadian Mounted Police (RCMP) such as officer impersonation, and officer and public safety.

Scope

The scope of this review focused on the impact of policy changes and the related implementation for the period of April 1, 2019 to December 31, 2021. The scope included:

- An examination of the effectiveness of controls in place for unit commanders’ approval of the reimbursement of cargo pants, boots and gloves;
- An assessment of risks related to the changes in the UDM;
- Identification of trends and cost analysis for items issued through the Online Ordering System compared to reimbursement of items purchased off-the-shelf; and
- Adherence to controls related to disposal of uniform items throughout a member’s career, as stated in policy.

Exclusions

- ❖ Initial issue of uniforms to cadets required for training while at Depot.
- ❖ Design standards and inventory management of uniforms by Corporate Management and Comptrollership (CM&C).
- ❖ Disposal of uniforms upon member departure due to the IAER Audit of the Departure Process – Phase Two (Equipment) completed in 2022.

The review team employed various techniques including interviews, documentation reviews, data analysis, and file testing. Specifically:

- ✓ Conducted interviews with key personnel in the Uniform and Equipment Program (UEP); Action, Innovation and Modernization (AIM); Corps Sergeant Major (C/S/M); Chairs of the Uniform and Equipment Committee and Sub-Committee; and unit commanders, commanding officers and warrant officers within NHQ, E, G, J and O Divisions.
- ✓ Examined controls and assessed compliance and risks related to recent changes in the UDM.
- ✓ Performed data analysis to identify trends and costs related to the issuance, reimbursement and purchase of uniforms.

Detailed review criteria are contained in Appendix A.

Sample Testing

The review examined a sample of 150 uniform transactions from E, J, G and O Divisions. This included:

- **50** transactions from the Total Expenditures and Asset Management System (TEAM) Portal – UEP Online Ordering System
- **70** transactions from the TEAM Portal – Travel & Expenses – Expense Claim
- **30** transactions from acquisition cards and invoice purchases (direct invoices and invoices linked to a contract)

Table 1: Transactions Sample per Division

| | TEAM Portal – UEP Online Ordering System | TEAM Portal – Expense Claim | | | Acquisition Cards & Invoices |
|-------|------------------------------------------|-----------------------------|-------------|--------|------------------------------|
| | | Boots | Cargo Pants | Gloves | |
| E | 20 | 15 | 17 | 2 | 15 |
| G | 10 | 5 | 6 | 1 | 5 |
| J | 10 | 5 | 6 | 1 | 5 |
| O | 10 | 5 | 6 | 1 | 5 |
| Total | 50 | 30 | 35 | 5 | 30 |

Statement of Conformance

The Review 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.

Overview of Uniform



- The RCMP provides members with the necessary articles of approved uniform for their assigned function, which they wear in accordance with the relevant operational needs, health and safety requirements, and any other considerations related to the promotion of an inclusive and diverse workforce.
- The RCMP distributes uniform items to more than 19,000 members in Canada from coast to coast to coast, with more than 700 detachments across the country. Members have different needs and must respond to a variety of operational environments, which requires uniform to take into account varying geography, climate, and conditions such as isolated, remote, and urban locations.
- Regular Members wear the service order uniform, referred to as the “general duty uniform” when performing frontline policing. This includes a member’s hat, shirt, blue pants with the yellow stripe, boots, duty belt with intervention options, soft body armour, and jacket or coat.
 - The intervention options for the duty belt include items such as the pistol, magazines, oleoresin capsicum (pepper) spray, baton, handcuffs, naloxone pouch, folding knife, portable radio, and flashlight.
- The RCMP also provides members with the red serge ceremonial uniform.

As the environment in which police operate is continually changing, the RCMP needs to adapt to new demands and challenges to fulfill its mandate and seek to modernize uniform items to meet member needs.

Roles and Responsibilities

Commissioner

- Final authority on matters pertaining to RCMP Working Order uniform as outlined in the *RCMP Regulations, 2014*

Uniform and Equipment Committee (UEC) and Sub-Committee (UESC)

- Supports operations by facilitating the timely assessment of submissions related to operational requirements for uniforms and equipment

National Police Federation (NPF)

- Provides representation to promote and enhance the rights of RCMP Members across the country



Corps Sergeant Major (C/S/M)

- Policy centre for UDM – ch. 1
- Leads the Warrant Officer Program
- With support from warrant officers, provides guidance on uniform and dress, matters pertaining to orders of dress, and ceremonial protocol

Warrant Officers

- Provide liaison and advisory role to commanding officers on behalf of members and National Headquarters
- Support outreach, engagement, and modernization initiatives

UEP under CM&C

- Policy centre for UDM – ch. 2 to 8
- Responsible for the design, quality assurance, storage, and distribution of uniform items to members
- Maintains the Online Ordering System in TEAM for members to order RCMP-issued uniform items

AIM

- Supports the C/S/M and the UEP in making updates to the UDM
- Provides Gender Based Analysis Plus analysis of uniform modernization projects
- Reviews employee suggestions and feedback on uniform items through the Innovation Inbox to support modernization



Commanding Officers

- Provide direction on the orders of dress for ceremonial and community engagement functions

Unit Commanders/Supervisors

- Inform members of the uniform items necessary for their duties
- Use relevant tools and processes to ensure compliance with policy and address any failure to comply
- Condemn uniform items when they are no longer serviceable
- Approve purchases of uniform items for members in accordance with the UDM and financial policies

Members

- Adhere to the policy



Overview

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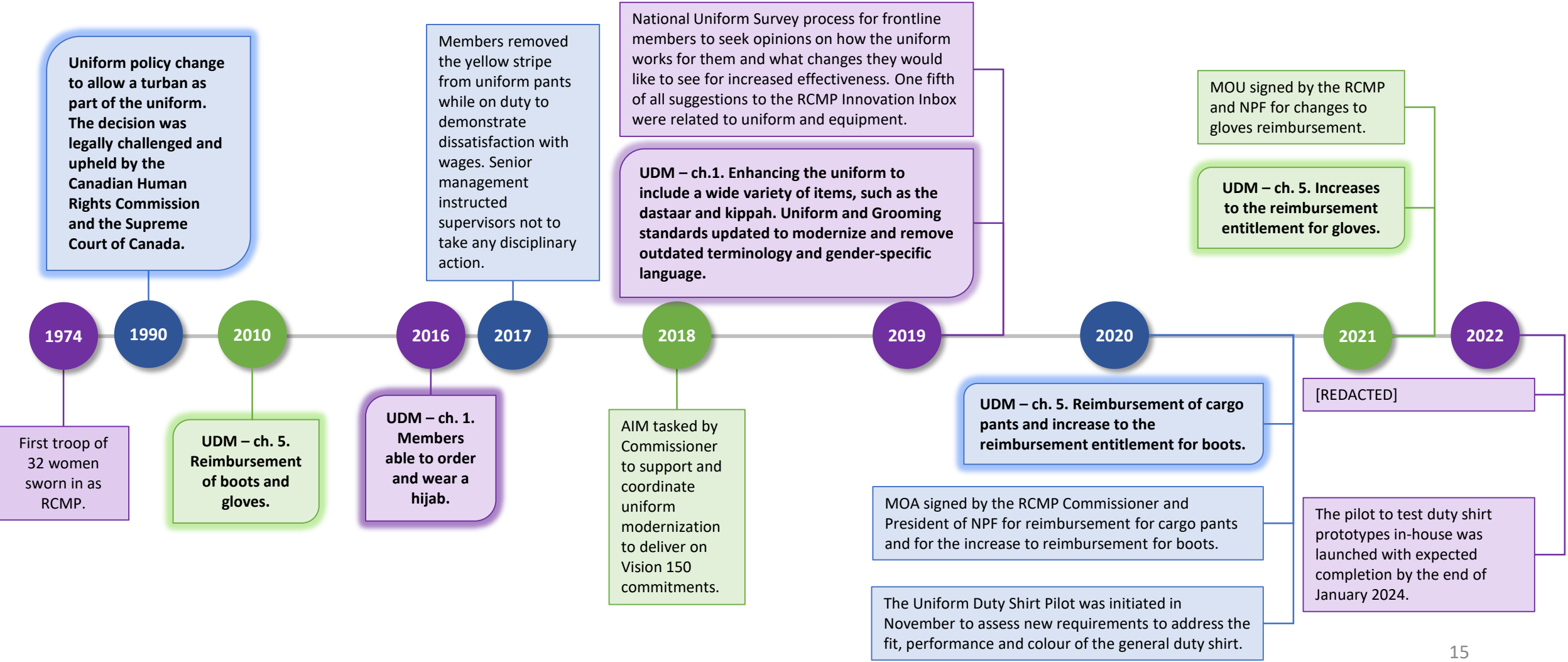
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Modernization: Timeline of Policy Changes

The timeline below identifies key events in the history of the RCMP that led to policy changes in support of modernization, indicating few significant changes prior to 2010.



Modernization: Cargo Pants and Duty Boots

The modernization of uniforms is a [Vision 150](#) commitment and an important issue to members. In support of modern policing, the RCMP recognizes that the uniform must address the operational environment and take into account comfort, protection, officer safety, and inclusivity, while also maintaining the meaningful traditions of the RCMP.

The **RCMP and NPF signed a Memorandum of Agreement (MOA)** on October 30, 2020, to **allow members the flexibility to purchase their choice of cargo pants and duty boots**, subject to criteria and reimbursement entitlements. The joint decision was intended to address member needs for a modern front-line uniform with improved functionality and fit.



The Commissioner stated that this new entitlement supported Members' interests at the forefront and acknowledged that many Members were previously funding these items from their own pocket. The MOA:

- Was signed with the principle that the cargo pants and duty boots were considered resolved and were withdrawn from the collective bargaining process.
- Established that the UDM would be amended by November 2020, and included an Annex that contained the entitlements for reimbursement, the use of the TEAM Portal and Form 1393 (Expense Claim) for the submission of claims, and criteria for the purchase of off-the-shelf uniform cargo pants and duty boots.

The UDM – ch. 5.3 (cargo pants) and ch. 5.4 (duty boots) were amended to reflect the entitlements and criteria for reimbursement agreed upon in the Annex of the MOA. Appendix B contains the agreed upon amendments.



The MOA also stated that the **RCMP and NPF agreed to review the changes 12 months** from the date of the amended policy.

The analysis provided in this engagement provides valuable information to support the 12 month review requirement of the October 30, 2020 MOA.

Authority for Reimbursement

The RCMP Regulations set out the authority of the Commissioner for the issuance of clothing for the general duty uniform.

All items remain Crown property and must be properly safeguarded until disposed of in accordance with the Regulations and RCMP directives.

- Subject to the decision by the Commissioner and NPF in November 2020, the UDM – ch. 5 provides the unit commander with the authority to approve the purchase and reimbursement of cargo pants, boots, and gloves subject to criteria and specified entitlements.
 - The policy change is popular with members. Unit commanders who were interviewed stated that members are very satisfied with the ability to purchase items off-the-shelf, and identified that members are able to purchase clothing that provides them with optimal comfort and fit for their operational duties and conditions of work.
- [REDACTED]
- The RCMP is considering options on a way forward to ensure that the organization acts within its authority.



Modernization: Vision 150 and Beyond

Ch. 1. Uniform and Grooming standards was updated in May 2019 to identify and remove barriers for diverse groups of people while ensuring a professional look and enhanced safety. AIM led the revision of Ch. 1 to ensure that gender based analysis factors were considered.

The modernization of uniforms is ongoing with the current Uniform Duty Shirt Pilot Project, led by AIM for the UEP.

- The pilot initially explored using off-the-shelf shirts with the option of reimbursement. Discussions in October 2021 identified the importance of the RCMP having access to the shirt rather than members buying off-the-shelf. It was determined that issuing a shirt from the UEP would provide greater overall efficiencies, access to a wide variety of sizes, and consistent colour requirements as per the UEP standards. Additionally, the use of the UEP Online Ordering System would provide better controls, the ability to monitor issuance, and lower the risk of officer impersonation.
- The Pilot is currently underway with diverse members from across Canada selected to wear and assess the prototype shirts in spring 2023.



Interviewees informed the Review team that members are dissatisfied with the pace of modernization for the uniform duty shirt, as well as the lack of communication on the progress. Updates have not been regularly communicated to members throughout the Pilot, and the recent update in September 2022 does not provide expected completion times or how the shirt will be selected, which unit commanders identified as being of interest to members.

The Review team noted that the Equipment and Asset Lifecycle Management (EALM) project is in progress. It includes a communication strategy that is intended to increase transparency by providing updates on the Infoweb in addition to national broadcasts to mitigate communication delays.

As modernization continues, there is a need to communicate updates with members to keep them abreast of the progress the RCMP is making with modernizing the uniform. There is a risk that members may perceive their voice is not heard, which may contribute to purchasing non-approved items on their own or through their unit commanders, as with previous purchases of cargo pants prior to the UDM policy update.



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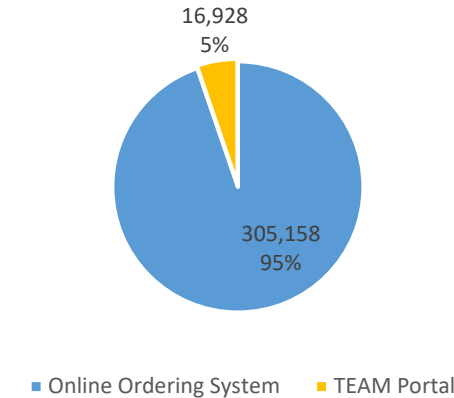
Trends: Issuance and Reimbursement

UDM - ch. 5. Requisition and Supply sec. 5.1.1 states that units and members are provided with all essential uniform and equipment items required to carry out their duties and responsibilities, conditional upon needs, duties, supplies, funds, and other restrictions.

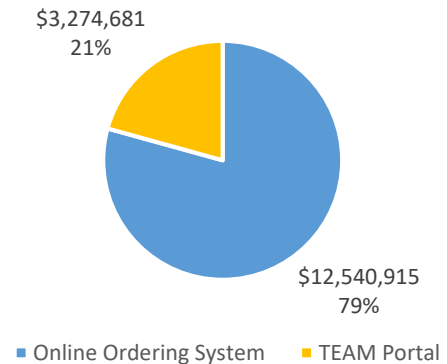
- Ch. 5 specifies that items **are** to be ordered using the Online Ordering System.
- Cargo pants, winter and summer duty boots and slash-resistant gloves **may** also be purchased off-the-shelf and submitted for reimbursement through the TEAM Portal.
- **Tables 2 and 3** indicate that 95% of uniform and equipment items were issued through the Online Ordering System and account for 79% of expenditures.

- The Review team noted that the **TEAM Portal does not contain a field that captures the quantity of items being reimbursed.**
- As a result, the RCMP cannot accurately identify the quantity of cargo pants, boots and gloves purchased.
- The Review team estimated the quantity of items ordered from the TEAM Portal based on the value of reimbursement transactions.
- **Tables 2 and 3** indicate that the UDM policy changes for reimbursement of items accounts for approximately 5% of uniform and equipment items and 21% of expenditures.

**Table 2 - Total Items Ordered:
Online Ordering System and TEAM Portal**



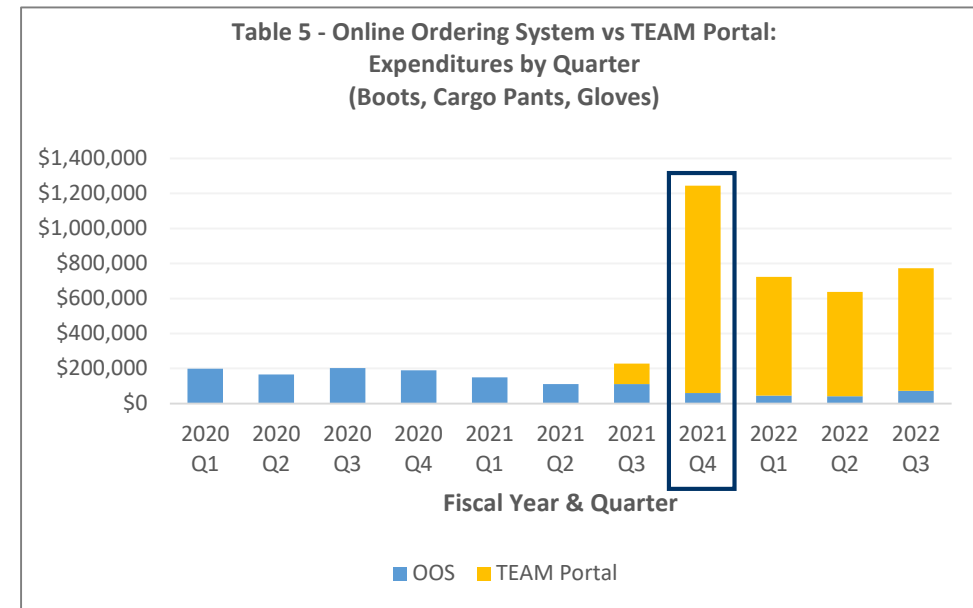
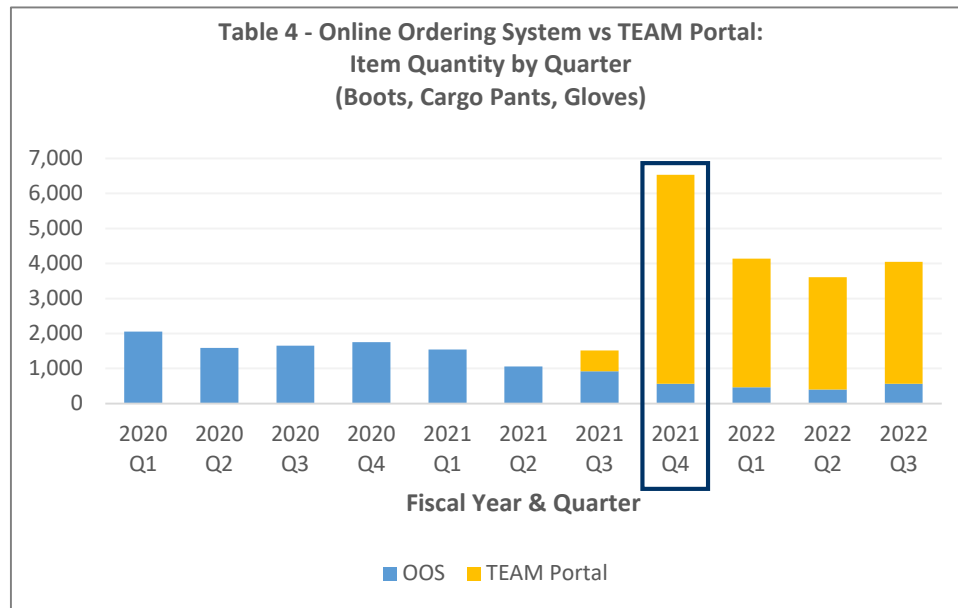
**Table 3 - Total Expenditures:
Online Ordering System and TEAM Portal**



Trends: Boots, Cargo Pants and Gloves

- After the November 2020 policy change, there were fewer transactions for cargo pants, boots and gloves in the Online Ordering System. **Tables 4 and 5** indicate that the quantity of **cargo pants, boots and gloves purchased off-the-shelf and reimbursed increased significantly as of Fiscal Year (FY) 2021 Q4**, which may be due to:

- ↑ an increase in members purchasing cargo pants off-the-shelf as a result of the new reimbursement policy; and
- ↑ an increase in members purchasing duty boots as a result of the higher reimbursement entitlement (summer boots \$200 and winter boots \$300) and option to combine the summer and winter boots reimbursements up to the maximum entitlement (\$500) as agreed upon in the MOA.



Trends: Boots, Cargo Pants and Gloves

Based on the trend results from [Table 6](#) on the following page, the Review team noted:



- More members purchased off-the-shelf boots than those who ordered them through the Online Ordering System.
- The **average reimbursement amount for boots purchased off-the-shelf is 52% higher** than the cost of issuing boots through the Online Ordering System.
- Most reimbursements for boots are within the maximum reimbursement amount.



- More members purchased cargo pants off-the-shelf than those who ordered them through the Online Ordering System.
- The **average reimbursement amount for cargo pants purchased off-the-shelf is 173% higher** than the cost of issued cargo pants through the Online Ordering System.
- Most reimbursements for cargo pants are within the maximum reimbursement amount.



- Fewer members purchased slash-resistant gloves off-the-shelf than through the Online Ordering System.
- The **average reimbursement amount for gloves purchased off-the-shelf is 27% higher** than the cost of issued gloves through the Online Ordering System.
- [REDACTED]

Trends: Boots, Cargo Pants and Gloves

Table 6 – Comparison of the Online Ordering System and TEAM Portal for Boots, Cargo Pants and Gloves*
April 1, 2019 to December 31, 2021

| <i>Boots</i> | | | <i>Cargo Pants</i> | | | <i>Slash Resistant Gloves</i> | | |
|------------------------|--------------|-------------|---------------------------|--------------|-------------|--------------------------------------|--------------|-------------|
| Online Ordering System | VS | TEAM Portal | Online Ordering System | VS | TEAM Portal | Online Ordering System | VS | TEAM Portal |
| 3,486 | # Members | 4,938 | 2,935 | # Members | 5,622 | 1,390 | # Members | 578 |
| 4,444 | Quantity | 5,515 | 6,498 | Quantity | 10,812 | 1,633 | Quantity | 601 |
| \$898,470 | Total Cost | \$1,697,378 | \$364,344 | Total Cost | \$1,538,161 | \$82,875 | Total Cost | \$39,143 |
| \$202 | Average Cost | \$308 | \$56 | Average Cost | \$142 | \$51 | Average Cost | \$65 |
| [REDACTED] | | | [REDACTED] | | | [REDACTED] | | |

* While at Depot, Cadets are provided with boots, cargo pants and slash resistant gloves issued from the Online Ordering System.



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Governance

A Terms of Reference was under development for the UEC and UESC at the time of the Review and work remains to be completed to finalize the mandate and scope, as well as linkages to the existing RCMP governance structure. The EALM project was also underway.

UEC

- The Review found that the UEC in its current form includes the Deputy Commissioner, Contract and Indigenous Policing (DC C&IP) as the Chair.
- At present, DC C&IP is the only member of the committee as other members have not been assigned.
- The Chair is the sole approver for uniform and equipment recommendations. As required, the Chair will obtain Senior Executive Committee approval for items that are not within delegated authority.

UESC

- The governance structure for the UESC was under development at the time of the Review and has operated in its current form since March 2020.
- The UESC is chaired by C&IP, with representation from C&IP, CM&C, UEP, Occupational Health and Safety, Warrant Officers, National Armoury, Legal, AIM, and three members from the NPF as agreed upon in the MOU.
 - The UESC assesses requests for uniform and equipment taking into consideration perspectives from multiple stakeholders to identify potential national consequences, risks to members, liabilities, and national funding implications.

The EALM initiative includes the **development of a national intake process for uniform and equipment requests**, which would include identification of operational requirements, and assessment and approval by the UESC. Establishing and communicating an intake process across the RCMP is important because the RCMP is highly decentralized and **there is a risk that unit commanders across the country may make decisions related to uniform without consultation with Subject Matter Experts and key stakeholders** including the UEP.

Without adherence to the intake process by unit commanders across all detachments, there is a risk to officer safety and the RCMP may not maintain oversight and accountability for uniform items.

Online Ordering System: Compliance

The Review found that a process is in place for the issuance of uniform items from the RCMP Online Ordering System, which is generally being followed.

- The UDM gives the unit commander authority to approve uniform items for their employees and the items issued to employees remain the property of the Crown. Unit commanders must adhere to their delegated authorities as per the *Financial Administration Act* (FAA). In accordance with the UDM, members are required to order the uniform items permitted for their duty code through the UEP Online Ordering System.
- Interviewees stated that the process generally works well and is efficient and timely.
- Table 7 indicates the results of testing a sample of 50 transactions processed through the Online Ordering System:

Based on the compliance results in [Table 7](#), the Review team noted the following:

- Controls are in place to prevent a member from exceeding the entitlement for a single purchase. The ability to submit multiple purchases for the same item is permitted to allow for the replacement of lost or damaged items before the end of their lifecycle. There were **4** instances where members were permitted to purchase items that exceeded the entitlement (ankle boots, arctic mittens, shoulder badges and lightweight socks).
- In **2** instances, there was no evidence of FAA Section 32 approval. The orders were submitted using a paper requisition form that included FAA Section 32 approval; the UEP has a two-year retention policy so the forms were not available for review.

Table 7 – Online Ordering System Testing Results

| Compliance with Expense Entitlements | 46 / 50 | 92% |
|-------------------------------------------------------------|---------|------|
| Employee was entitled to the item based on duty code | 50 / 50 | 100% |
| UDM entitlement limits were respected | 46 / 50 | 92% |
| Compliance with Financial Delegation Authority | 48 / 50 | 96% |
| FAA Section 32 on file and approver has delegated authority | 48 / 50 | 96% |



Reimbursement: Compliance

The Review found that a process is in place for the approval and reimbursement of cargo pants, boots and gloves, but procedures are not being consistently followed.

- Table 8 indicates the results of testing a sample of 70 reimbursement transactions through the TEAM Portal consisting of 30 duty boots, 35 cargo pants and 5 gloves.

Table 8 – Reimbursement Testing Results

| | Boots | | Cargo Pants | | Gloves | | Compliance Totals | |
|-----------------------------------------------------------------------------|----------------|------------|----------------|------------|--------------|------------|-------------------|------------|
| | | | | | | | ✓ | ✗ |
| Compliance with Expense Entitlements | 29 / 30 | 97% | 25 / 35 | 71% | 0 / 5 | 0% | 54 | 16 |
| Reimbursement was for an item approved under the UDM | 30 / 30 | 100% | 34 / 35 | 97% | 5 / 5 | 100% | 69 | 1 |
| [REDACTED] | [REDACTED] | [REDACTED] | [REDACTED] | [REDACTED] | [REDACTED] | [REDACTED] | [REDACTED] | [REDACTED] |
| Duplicate reimbursement | 1 / 30 | 3% | 1 / 35 | 3% | 0 / 5 | 0% | 68 | 2 |
| Compliance with Financial Delegation Authority | 9 / 30 | 30% | 3 / 35 | 9% | 0 / 5 | 0% | 12 | 58 |
| [REDACTED] | [REDACTED] | [REDACTED] | [REDACTED] | [REDACTED] | [REDACTED] | [REDACTED] | [REDACTED] | [REDACTED] |
| Valid FAA Section 34 | 30 / 30 | 100% | 35 / 35 | 100% | 5 / 5 | 100% | 70 | 0 |
| Compliance with Supporting Documentation | 0 / 30 | 0% | 32 / 35 | 91% | 0 / 5 | 0% | 32 | 38 |
| Receipt for the item is on file | 30 / 30 | 100% | 35 / 35 | 100% | 5 / 5 | 100% | 70 | 0 |
| Documentation is available to allow UDM criteria to be assessed by approver | 0 / 30 | 0% | 32 / 35 | 91% | 0 / 5 | 0% | 32 | 38 |

Reimbursement: Compliance

Based on the compliance results from Table 8, the Review team noted the following:

- Only **4% (3 out of 70)** reimbursement transactions were in compliance with all requirements, including expense entitlement, financial approvals and supporting documentation.
- The Review team noted where transactions were **not in compliance** with the reimbursement process and financial requirements. Specifically:

2 transactions were reimbursed twice to the members (boots and cargo pants).

- The Internal Audit, Evaluation and Review Data Analytics team performed an analysis of the entire reimbursement transaction population and found **7 additional instances** where members were reimbursed twice for the same purchase.

[REDACTED]

- While all of the reimbursements for boots were within the established entitlements, transactions for all **5** gloves and **12** cargo pants exceeded the maximum UDM entitlements.

[REDACTED]

None of the boots or gloves transactions had sufficient information on file to determine if the item purchased off-the-shelf met the criteria in UDM – ch. 5. The information on the receipts for the boots and gloves was limited and does not permit a unit commander to validate against the UDM criteria.

- **3 receipts** had limited information while most (32 of 35) of the sampled cargo pants transactions were for the brand 5.11© pants, which meet the specifications outlined in the UDM.

- Unit commanders interviewed **were aware** of the financial authorities and member entitlements. However, they identified that they have demanding operational environments leaving little time to read policy updates.
- [REDACTED]
- [REDACTED]

Reimbursement Risks

The RCMP is responsible for items purchased and reimbursed to members. [REDACTED], there is a risk that the UDM performance criteria is not being met, which can **impact officer health and safety**, as well as liability to the RCMP in the event of a critical incident.

Although members are able to select boots that accommodate their needs, there is a risk that members are wearing boots that provide comfort but do not adhere to the UDM performance standards as unit commanders **cannot validate from receipts that boots meet the policy criteria.**

- Based on the Divisional Safety Performance Report Cards prepared by RCMP Occupational Health and Safety, **slips and falls have been within the top six injuries since 2017** in every division. However, occupational health and safety data does not identify the type of boots that were worn when a member was injured to assess whether the boots were purchased off-the-shelf and/or contributed to injuries.

There is also a risk that members do not have **equitable access** for the reimbursement of uniform items across all detachments. Some smaller detachments may not approve entitlements based on available funding. One detachment in G Division noted that orders from the Online Ordering System are not always approved when facing financial constraints, even if members are replacing uniform items that are no longer serviceable.



Non-Stock Items

- **Uniform Issue – “non-stocked items” is an expense category in the TEAM Portal for reimbursement claims** for items that are approved for local purchases based on duty code but are not provided by the Online Ordering System. For example, Motorcycle Operator – Duty Code 264 can purchase specified items locally.
 - The introduction of the reimbursement policy allowed members to submit reimbursement claims for cargo pants, boots and gloves under the Uniform Issue - non-stocked items category until the TEAM Portal was updated to include separate categories for the three items.
- The Review team examined the purchase history for each member that was in the sample for the testing of 70 reimbursement transactions to assess whether the use of the category was in compliance with the UEP Ordering Guide requirements. Testing results indicated that:
 - the Uniform Issue - non-stocked items category was used for reimbursements for non-approved items, both before and after the policy change;
 - **26 of the 70 (37%) transactions tested were reimbursements for non-approved items** such as navy duty shirts, jackets, duty belts, running shoes, sunglasses, backpacks and ball caps; and,
 - **4 members** were reimbursed for off-the-shelf cargo pants with a yellow stripe **purchased prior** to the policy update.

Table 9 indicates the use of the Uniform Issue - non-stocked items category during the scope period.

- ❖ In FY 2019-20, the category was used for off-the-shelf purchases of ankle and winter boots and slash-resistant gloves.
- ❖ In FY 2020-21, the category included cargo pants in Q3 (November) due to the policy change, which may account for the increase in transactions and value.
- ❖ In FY 2020-21 Q3 (December), separate categories were created for the pants, boots and gloves, which may account for the decrease in transactions.

Purchase details can only be obtained by reviewing claim receipts in the TEAM Portal, making it [REDACTED]. Although use of the Uniform Issue - non-stocked items category decreased in FY 2021-22, **there is a risk that it may continue to be used for non-approved items.**

Table 9 – Uniform Issue - Non Stocked Items: Transaction Volume and Value by Quarter

| | FY 2020 | | FY 2021 | | FY 2022* | |
|---------------|--------------|--------------------|--------------|--------------------|--------------|------------------|
| | Transactions | Value | Transactions | Value | Transactions | Value |
| Q1 | 1,396 | \$250,774 | 1,103 | \$217,493 | 624 | \$153,301 |
| Q2 | 1,473 | \$278,240 | 1,308 | \$255,931 | 588 | \$150,849 |
| Q3 | 1,566 | \$274,409 | 3,289 | \$867,474 | 651 | \$167,794 |
| Q4 | 1,857 | \$369,219 | 1,177 | \$290,611 | -- | -- |
| Total: | 6,292 | \$1,172,642 | 6,877 | \$1,631,509 | 1,863 | \$471,944 |

* Partial Fiscal Year: Up to December 31, 2021

[REDACTED]

[REDACTED]

[REDACTED]

Summary of Risk: Before and After Reimbursement Policy Changes

System controls are in place in the **Online Ordering System** (fully implemented in 2014) to help ensure compliance with the UDM and financial authorities.

Before

| Controls in Place | Residual Risk |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------|
| <ul style="list-style-type: none">• Only approved uniform items are available to order• FAA Section 32 approval is automatically validated against the record of Delegated Financial Signing Authorities in TEAM• Automated controls for quantity entitlements with the ability to exceed them for operational reasons with approval• Member order history available in the system | <ul style="list-style-type: none">• Quantity entitlements could be exceeded for non-operational reasons |

UDM Policy Change 2010 – the reimbursement for purchases of ankle boots, winter boots and slash-resistant gloves are processed through TEAM **resulting in fewer controls** than orders processed through the Online Ordering System.

After

| Controls in Place | Residual Risk |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <ul style="list-style-type: none">• UDM – ch. 5 outlines maximum reimbursement amounts, quantity limits and specifications the off-the-shelf items must meet• FAA Section 34 approval is automatically validated against the record of Delegated Financial Signing Authorities in TEAM | <ul style="list-style-type: none">• [REDACTED]• Cannot validate if reimbursed items meet specifications outlined in UDM – ch. 5• [REDACTED]• [REDACTED]• [REDACTED] |
| <p>November 2020 – members are reimbursed for cargo pants off-the-shelf. This increased risks related to reimbursement.</p> | <ul style="list-style-type: none">• [REDACTED]• [REDACTED]• [REDACTED] |



The risk of officer impersonation existed prior to the policy changes. Although the RCMP cannot prevent external intentional misuse of uniform items, it is important to ensure that controls are in place to reduce risks that are within the RCMP’s purview.



Overview

Modernization

Uniform Trends

Assessment of Risks
for Uniforms

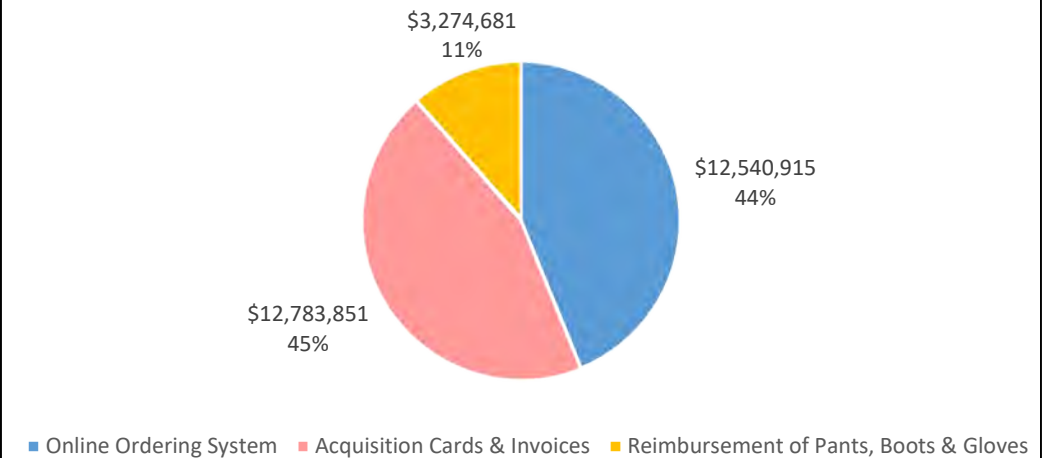
**Adherence to Uniform
Requirements**

Purchases by Unit Commanders

Unit commanders do not have authority to purchase uniform items directly from suppliers or retailers without UEP guidance and NHQ operational policy centre approval, with the exception of duty boots, cargo pants and slash resistant gloves. Processes are in place to order special-made items that are not in stock.

- The uniform expense categories in the TEAM system include the purchase of non-stocked items of clothing and kit.
 - The purchases could be approved by the UEP for special-made items, items that are not in stock, or other operational reasons.
 - Unit commanders pay for some of these purchases by acquisition card and invoices directly to suppliers and retailers using their budget funds.
- Table 12** indicates that the **dollar value of purchases** for the expense categories using **acquisition cards and invoices** (\$12,783,851) **exceeded the value of items issued from the Online Ordering System** (\$12,540,915).
- The Review team examined a sample of 30 transactions from acquisition cards and invoices to assess whether the use of the categories were approved purchases. Testing results indicated that unit commanders purchased:
 - non-approved uniform items; and
 - equipment items such as holsters, magazine pouches and chest rigs without documented approvals.
- Although equipment is not within the Review scope, purchases that do not have documented approval pose a significant risk to officer health and safety if members are provided with equipment that does not meet RCMP standards.

Table 12: Uniform Items Spending by Method



A detailed assessment is required for the RCMP to identify if non-approved equipment is being purchased by unit commanders, the reasons for the purchase, and the extent to which this is happening. This assessment would greatly contribute to fully understand the significance of the risks related to purchasing equipment directly from suppliers and retailers without documented approval.

Acquisition Cards and Invoices

Table 13 indicates the results of testing a sample of 30 transactions from TEAM, using acquisition card purchases, direct invoices, and invoices linked to a contract.

- Based on the testing results from Table 13, most purchases were for non-approved uniform items including SBA, black uniform items (general duty uniform is gray shirt/navy pants), winter jackets, high visibility vests, and Gore-tex® clothing. Equipment items included holsters and magazine pouches.
- The Review team also noted that **none of the transactions were in compliance with all requirements**, namely expense entitlement, financial authorities and supporting documentation. Specifically:

10 transactions were for items available in the Online Ordering System and were not approved to be purchased off-the-shelf.

2 transactions resulted in an invoice being paid twice.

28 transactions were not in compliance with FAA financial delegation authorities; [REDACTED]

- 2 of the 28 transactions** were acquisition card purchases for 5.11® navy cargo pants, which is not a UDM approved method of payment.

8 transactions did not have a rationale to explain why non-approved uniform and equipment items were purchased. The rationale for 22 transactions was provided internally within a unit or division.

Table 13 – Acquisition Card and Invoice Testing Results

| Compliance with Expense Entitlements | 4 / 30 | 13% |
|-----------------------------------------------------------------------------------------------------|------------|------------|
| Item available though the Online Ordering System which should not have been purchased off-the-shelf | 10 / 30 | 33% |
| Duplicate reimbursement | 2 / 30 | 7% |
| Compliance with Financial Delegation Authority | 2 / 30 | 7% |
| [REDACTED] | [REDACTED] | [REDACTED] |
| Valid FAA Section 34 | 21 / 30 | 70% |
| Compliance with Supporting Documentation | 20 / 30 | 67% |
| Receipt for the item available with description | 26 / 30 | 87% |
| Purchase rationale provided | 22 / 30 | 73% |

- Unit commanders are not consistently adhering to the requirements of the uniform policy.** The Review team also noted that **none of the 30 transactions had evidence of unit commander consultation with the UEP** to identify the reasons for the purchase outside the Online Ordering System. Unit commanders stated that they do not consult the UEP or NHQ policy centres about uniform and equipment items they want to purchase; instead, they consult within their own divisions.
- Although the UEP has a complaint mechanism in place for members, the review found that there were **only 7 Unsatisfactory Condition/Failure Reports** (form 1704) submitted to the UEP during the scope period. Complaints included the white “Police” lettering peeling off the SBA carrier or vest and uniform defects.

Non-approved Purchases: Context

RCMP members require uniform items that are functional and meet their diverse needs while contributing to their health and safety, comfort and pride. The RCMP provides members with uniform items that are tested to meet standards for health and safety.

Unit commanders identified that members may buy uniform items directly from retailers, or alter RCMP-issued items, if they **were not satisfied** with items from the Online Ordering System, or perceived items are of poor quality, or do not meet their comfort needs.

The 2019 RCMP Uniform and Kit Modernization Survey results indicated that members purchased items outside of the Online Ordering System due to the lack of options to accommodate the diverse range of body types. Members were seeking to address their individual needs for comfort and functionality for uniform and equipment items. A lack of approved options to meet members needs can result in frustration, as well as negatively impact feelings of inclusion, belonging and pride if not provided with options that fit.

Interviewees also informed the Review Team that members experienced issues with existing RCMP uniform items. Members or Unit Commanders purchased uniform when items:

- were backordered and not available in the Online Ordering System, such as SBA;
- did not fit appropriately;
- did not meet operational demands, such as the need for a high degree of warmth or waterproofness;
- contributed negatively to health, such as back problems and members could not obtain an approved ergonomic duty belt in a timely manner; and
- were **perceived** to have inferior material(s) compared to items available off-the-shelf for comfort, fit and functionality.



Although interviewees identified reasons for purchasing outside of the Online Order System, the associated risks to officer health and safety with these purchases is significant particularly if purchasing equipment. Compliance with the UDM policy is required to help ensure officer safety and to minimize risk to the RCMP.

Non-approved Purchases: Risks

Although members and unit commanders are seeking to improve comfort and functionality when purchasing non-approved uniform and equipment, there are risks to the RCMP.

The RCMP is at **risk of failing to meet *Canada Labour Code* obligations** if a unit commander purchases items for members that are not assessed, tested or approved by C&IP and the UEP to assess if performance and safety criteria are met. Purchasing items directly increases the risk that members are wearing clothing and using equipment that could have a quality level below the RCMP-issued items, resulting in occupational health and officer safety risks. The RCMP may face liability if there is a critical incident and the non-approved equipment fails.

Purchasing items that are not approved results in providing members across the organization with uniform and equipment that may have different performance standards and functionality. This leaves the RCMP at **risk of inequitable uniform and equipment standards**, which can impact officer and public safety as well as present potential liability.

The RCMP is at risk of failing to meet Official Language Act obligations if a unit commander purchases non-approved, unilingual items for members that do not reflect the equal status of French and English. Unilingual signage and patches can potentially disadvantage members of the other official language community.

The RCMP does not have visibility and oversight for the purchase of these non-approved items, but **does maintain responsibility** for uniform and equipment purchased by a unit commander for a member.



The risks impacting officer health and safety requires the RCMP to have processes in place to prevent the direct purchase of non-approved uniform items and equipment. **It is important** for commanding officers to identify issues and operational needs, and that the process functions effectively to **ensure** that members have the uniform items required to perform their work.

The Review team noted that implementation of the EALM Needs Assessment process is intended to provide a national intake process to request equipment and assets needed to support RCMP operations. The intent of the process is to coordinate response from the appropriate policy center to address any issues with uniform and equipment.

Adherence to Uniform Requirements

The review found that unit commanders and commanding officers do not consistently enforce the standard uniform requirements.

The current culture of purchasing items outside of the UEP has contributed to members being dressed inconsistently rather than the RCMP approved general duty uniform.

Unit commanders identified that:

- they would not discipline a member for wearing non-standard uniform items but would have a discussion with the member to obtain a reasonable compromise. **Disciplinary action would result only for an exceptional uniform violation.**
- perceived delays in addressing uniform comfort issues, as well as perceptions of superior items available off-the-shelf for functionality, contributes to member frustration and can lead to the purchase of non-approved items to meet their needs.
- they want a full complement of officers on duty who feel comfortable, look professional, and have positive morale.
- they **are responsible for the well-being of their employees** and will make decisions to allow non-approved uniform items if they believe it will contribute to the members health and safety, comfort and pride when performing policing duties.



The RCMP recognizes the issue of the lack of adherence in wearing the approved uniform. The C/S/M sent an Infoweb communique on April 5, 2022 on the importance of consistency of the RCMP approved uniform and indicated the NPF is supportive of the advancement of uniform standards. As stated in the communique, the standard RCMP general duty uniform serves to ensure police identification, public confidence, member safety, and public safety.

A lack of adherence to standard uniform requirements can increase the risk to officer safety if members wear uniform items that do not meet the tested capabilities required for diverse hazards in the operational environment.

Adherence to Uniform Requirement Challenges

Going Forward



- Unit commanders indicated that **they believe in a standardized uniform** and want members to adhere to policy, but enforcement of requirements would need to be communicated by senior management and the NPF to ensure that any expected disciplinary actions for non-compliance could be carried out.
- The review findings indicate that, going forward, the RCMP faces a **significant challenge and effort to have all members across the country adhere to the standard general duty uniform**. Adherence will require communication with members to ensure that they understand the importance and purpose of uniform standards and consistency.
- Adherence will also require **strong governance** to ensure that unit commanders follow national processes to identify gaps or their needs for different uniform items, rather than purchase them directly. This is important to ensure that consistency, equity across divisions, officer safety, and performance specifications are taken into account from the national perspective by the UESC stakeholders. The Review team noted that the vision of the EALM project is aligned with strengthening governance.

Disposal Throughout a Member's Career

The Review found that the UDM disposal guidance for identifiable uniform items is unclear.

The UDM – ch. 8.1.1. assigns responsibility for disposal to the unit commander. UDM – ch. 8.1.1. requires items of uniform no longer serviceable to be condemned at the unit level and destroyed in an environmentally safe manner, or altered so that they cannot be identified or worn as an article of uniform.

[REDACTED]



[REDACTED]

Disposal Challenges

[REDACTED]

The Review found that [REDACTED]

Some unit commanders identified that their detachment has access to other federal department incinerators to burn items in an environmentally safe manner. Other unit commanders indicated that some members burn items on their personal property, some detachments recycle items, and some detachments may have periodic call-outs for members to dispose of used items.

- Following the April 2020 mass casualty in Nova Scotia, the H Division Destruction Program in 2021 identified approximately 7,000 pounds of clothing for disposal from active members.

The RCMP has a National Standing Offer (NSO) for hazardous goods that is intended for all divisions to use, which includes disposal for uniform items. The NSO was scheduled to expire on February 13, 2022, but the vendor has agreed to an extension to honour the conditions, while the new SO is currently pending. The review found that:

- Unit commanders and warrant officers interviewed were [REDACTED]
- The NSO requires detachments pay for disposal and shipping costs, as well as ensure a securing shipping process. This may be a **logistics challenge for a remote detachment** to send items for disposal.

[REDACTED]

The Mass Casualty Commission may have recommendations in spring 2023 related to the tracking and disposal of identifiable police uniform items.



Recommendations

Given the crosscutting and multi-business line impacts of the recommendations we encourage key stakeholders to collaborate in their response to provide a pan-RCMP management action plan to best address the findings and related risks with the ultimate objective of strengthening compliance to the UDM while respecting the spirit of the concerns of Regular Members.

| Recommendations | Factors to Consider |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>1 With respect to the RCMP Regulations:</p> <ul style="list-style-type: none"> a. [REDACTED] identify options for how to address reimbursement, taking into consideration that members have the uniform items required to perform their work. b. determine the short-term and longer-term options to align policies with the RCMP Regulations, taking into consideration a risk-based phased approach. | <ul style="list-style-type: none"> ✓ Member comfort, including equity, diversity and inclusion needs ✓ Ease of purchase by public and use to impersonate an officer ✓ Lack of tracking off-the-shelf purchases ✓ Meet operational and safety requirements |
| <p>2 Conduct a detailed assessment of the purchases by acquisition card and invoices to identify the extent of non-approved uniform items and equipment purchases and develop a mitigation strategy to address the risks posed.</p> | <ul style="list-style-type: none"> ✓ Health and safety of officers ✓ Meet operational and safety requirements |
| <p>3 Review current organizational practices with a view to strengthen uniform policies while responding to equity, diversity and inclusion needs of Regular Members to:</p> <ul style="list-style-type: none"> a. ensure compliance with entitlements and delegated financial authorities for reimbursement and purchase of uniform items. b. ensure adherence by members to uniform requirements to maintain a consistent general duty uniform across the RCMP. c. [REDACTED] | <ul style="list-style-type: none"> ✓ Health and safety of officers ✓ Member comfort, including equity, diversity and inclusion needs ✓ Ensuring that officers are identifiable by a consistent uniform ✓ Liability to members and to the RCMP ✓ Public safety ✓ NPF support to enforce the standard uniform ✓ Stewardship when spending public funds ✓ Compliance with RCMP Authorities ✓ Compliance with Official Language obligations |



Appendix A: Review Objective and Criteria

Criterion 1

A governance structure that includes clear roles, responsibilities and oversight for uniform requirements is in place and is being followed.



Criterion 2

Effective controls are in place for the issuance, reimbursement and disposal of uniform items throughout a member’s career.



Criterion 3

Monitoring mechanisms are in place to ensure compliance with uniform policy requirements and to provide information for decision making.



Objective

To examine the controls related to changes to the UDM and assess the impact of risks to the Royal Canadian Mounted Police (RCMP) such as officer impersonation, and officer and public safety.

Appendix B: MOA Reimbursement of Cargo Pants and Duty Boots

| Cargo Pants Reimbursement | | Criteria for Off-the-Shelf Uniform Cargo Pants | |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>All uniform cargo pants must meet RCMP criteria;</p> <ul style="list-style-type: none"> Regular Members (RMs) and Reservists are entitled to reimbursement for a maximum of two (2) pairs of uniform cargo pants per fiscal year; Cargo pants that meet RCMP requirements may be purchased off the shelf; RCMP-issued cargo pants may be obtained (1 or both pairs) through RCMP TEAMS Portal; All uniform cargo pants are worn with the yellow stripe, unless assigned to a specialized operational unit I role where authorized not to wear the yellow stripe; RMs and Reservists will be reimbursed up to \$100.00 per pair of off-the shelf cargo pants, and up to \$155 where the cost of alterations I addition of the yellow stripe is required (UDM9.D) including tax and shipping; Where the cost of repairs exceed 55% of the total cost of cargo pants (off the shelf and/or RCMP-made), RMs and Reservists are entitled to the replacement item (UDM9.D); RMs and Reservists will submit all claims to their respective managers through the RCMP TEAM Portal, using form 1393; and Managers with s.32 signing authority are to ensure claims are accurate prior to submitting claim. | | <ul style="list-style-type: none"> [REDACTED] | |
| Duty Boot Reimbursement | | Criteria for Off-the-Shelf Summer Boots | Criteria for Off-the-Shelf Winter Boots |
| <p>All summer and winter duty boots must meet RCMP criteria;</p> <ul style="list-style-type: none"> Summer and winter boots may be purchased off-the-shelf or through RCMP TEAMS Portal. RMs and Reservists are entitled to reimbursement for a maximum of two pairs of boots every two years; Summer boots may be reimbursed up to \$200, and up to \$300 for winter boots, including tax and shipping; Reimbursement for summer boots and winter boots can be combined up to a maximum of \$500, including tax and shipping; Normal life expectancy is 2 years. Repair cost should not normally exceed 70% (UDM9.D); RMs and Reservists will submit claims to their respective managers through the RCMP TEAM Portal, using form 1393; and Managers with s.32 signing authority are to ensure claims are accurate prior to submitting claim. | | <ul style="list-style-type: none"> Provide arch/ankle support and protection, higher top styles are allowed; Solid black and the toes of boots have some impact resistance. One-piece construction with integrated heel; Wide folding tongue on boot, attached at the sides so as to make the shoe watertight (aka "Bellows Tongue"); Light padding/insulation with breathable synthetic lining. Insoles/ footbed with moisture absorbent, bactericidal, anti-odour properties are recommended; Cold-weather, oil-resistant and anti-slip sole, made with high quality rubber compound with lug tread pattern (or equivalent) sole; one-piece construction with integrated heel, and Full lacing with eyelets and/or speed lace tie ups (tunnel loop style and "Lace-to-Toe" options). | <ul style="list-style-type: none"> Solid black, high top style which provide arch/ankle support and protection. One-piece construction with integrated heel; Toes have some impact resistance, no soft-toed boots that do not offer support/protection; Wide folding tongue on boot, attached at the sides so as to make the shoe watertight (aka "Bellows Tongue"); Insulation throughout boot, rated to -20°C at minimum; Water-proof, moisture-vapour-permeable membrane-equipped bootie, fully encapsulating foot, or any equivalent system; Resistant and durable seams (seam-sealing tape, sonic /seam-welding technology, etc.); Full lacing with eyelets and/or speed lace tie ups (tunnel loop style and "Lace-to-Toe" options); Welted soles with "storm welting" or equivalent system to avoid seeping of water/moisture into soles of boots; and Cold-weather, oil-resistant and anti-slip sole, made with high quality rubber compound with lug tread pattern (or equivalent) sole to reduce danger of both wet ice and dry ice, and self-cleaning lugs to improve traction. |

Appendix C: Management Action Plan

| Recommendation | Management Action Plan |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1) With respect to the RCMP Regulations: <ul style="list-style-type: none">a) [REDACTED] identify options for how to address reimbursement, taking into consideration that members have the uniform items required to perform their work.b) determine the short-term and longer-term options to align policies with the RCMP Regulations, taking into consideration a risk-based phased approach. | <p>Agree.</p> <p>a) In June 2023, the RCMP Senior Executive Committee (SEC) held a stock take exercise with the objective of creating an achievable and effective way forward in addressing the recommendations of this review. During this meeting, SEC expressed a desire to continue the reimbursement model (as directed in the Uniform and Dress Manual) given flexibility it provides to Regular Members.</p> <p>[REDACTED]</p> <p>b) As the Policy Centre for the Uniform and Dress Manual (chapters 2-8), the Director General, Procurement, Materiel and Assets Management will ensure no other items are included to the UDM as a reimbursable item until the necessary authority is obtained.</p> <p>Until the longer term solution is found, RCMP will find alternative ways to meet the requirements of uniform items. These alternative methods include having the RCMP purchase on behalf of members. This practice has already been put into action. For example, there was a validated need to offer extreme cold weather boots for members. The approved strategy to meet this requirement was to have RCMP purchase this equipment on behalf of the Regular Members, rather than extending the reimbursement model. This practice was communicated to all Divisions in December 2022.</p> <p>Oversight and controls for this approach will be the responsibility of the Uniform and Equipment Sub-Committee.</p> <p>Completion Date:</p> <p>a) June 2024</p> <p>b) Will continue until item 1a) is completed by June 2024</p> <p>Position Responsible:</p> <p>a) DG, Procurement, Materiel and Assets Management (PMAM)</p> <p>b) DG, Procurement, Materiel and Assets Management (PMAM); and DG, Operational Readiness and Response, Contract & Indigenous Policing (C&IP) (Chair, Uniform and Equipment Sub-Committee)</p> |

Appendix C: Management Action Plan

| Recommendation | Management Action Plan |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 2) Conduct a detailed assessment of the purchases by acquisition card and invoices to identify the extent of non-approved uniform items and equipment purchases and develop a mitigation strategy to address the risks posed. | <p>Agree.</p> <p>a) The sample scan conducted as part of this review identified areas of potential risks arising from the purchase of non-approved uniform and equipment. C&IP and PMAM have collaborated with the Data Analytics and Oversight Monitoring group within the Internal Audit, Evaluation and Review team to conduct the detailed assessment well beyond the sample reviewed to determine the extent of the issue nationally.</p> <p>b) C&IP and PMAM will collaborate with all necessary stakeholders, including the Divisions and the National Police Federation, to develop a mitigation strategy to address the risks identified by the analytics review. This strategy will primarily focus on communication and education. Dependent upon the results of the detailed assessment, it may be necessary to expand the mitigation strategy to include remedial actions against those who intentionally contravene policies and negatively impact officer health and safety and ensure the effective functioning of internal controls.</p> <p>Completion Date:</p> <p>a) January 2024</p> <p>b) April 2024</p> <p>Position Responsible:</p> <p>a) DG, Procurement, Materiel and Assets Management; and DG, Operational Readiness and Response, Contract & Indigenous Policing (Chair, Uniform and Equipment Sub-Committee); and the Data Analytics and Oversight Monitoring group within Internal Audit, Evaluation and Review</p> <p>b) DG, Operational Readiness and Response, Contract & Indigenous Policing (Chair, Uniform and Equipment Sub-Committee); and DG, Procurement, Materiel and Assets Management</p> |

Appendix C: Management Action Plan

| Recommendation | Management Action Plan |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>3) Review current organizational practices with a view to strengthen uniform policies while responding to equity, diversity and inclusion needs of Regular Members to:</p> <ul style="list-style-type: none">a) ensure compliance with entitlements and delegated financial authorities for reimbursement and purchase of uniform items.b) ensure adherence by members to uniform requirements to maintain a consistent general duty uniform across the RCMP.c) [REDACTED] | <p>Agree.</p> <ul style="list-style-type: none">a) Procurement, Materiel and Assets Management has engaged with Corporate Management Systems to making changes to the TEAM Portal in order to achieve stronger compliance for these specific transactions. The planned enhancements include:<ul style="list-style-type: none">i. As a control mechanism, providing the approver a historical view of reimbursement claims for uniform items.ii. Prompts for the approver to validate that the requested reimbursement claim meets the UDM criteria (including valid Section 32, Financial Administration Act compliance).b) The Corps Sergeant Major and Warrant Officers will continue to engage with Commanding Officers on matters related to non-compliance of uniforms and equipment that can be addressed at the Divisional level. <p>As per response 2b) above, the mitigation strategy will include communication aimed to educate members and managers of the risks of non-approved equipment. Furthermore, the implementation of the Equipment and Asset Lifecycle Management Project and the utilization of the Uniform and Equipment Sub-Committee as the central portal for all identified capability deficiencies related to the general duty uniform, will introduce an accountable and transparent means to facilitate requests in a timely manner to meet the needs of general duty members.</p> <ul style="list-style-type: none">c) [REDACTED] |

Appendix C: Management Action Plan

| Recommendation | Management Action Plan |
|-----------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Recommendation 3 continued from previous page | <p>Completion Date:</p> <ul style="list-style-type: none">a) April 2024b) Messaging will be completed by April 2024 and non-compliance will be addressed on an ongoing basis.c) April 2024 <p>Position Responsible:</p> <ul style="list-style-type: none">a) DG, Procurement, Materiel and Assets Management; and DG, Corporate Management Systemsb) Corps Sergeant Major; DG, Operational Readiness and Response, Contract & Indigenous Policing (Chair, Uniform and Equipment Sub-Committee); and DG, Procurement, Materiel and Assets Managementc) Corps Sergeant Major; DG, Strategic Implementation Team, Reform, Accountability and Culture; DG, Operational Readiness and Response, Contract & Indigenous Policing (Chair, Uniform and Equipment Sub-Committee); and DG, Procurement, Materiel and Assets Management |