



Government of Nova Scotia

Service Nova Scotia Residential Tenancies

MARCH 2023

COMPLIANCE AND ENFORCEMENT UNIT PLAYBOOK



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Detailed Project Implementation Plan

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Final Engagement Plan

Final What We Heard Report

Final Options Development

Glossary Acronyms

TT Tenants

LL Landlords

CEU Compliance Enforcement Unit

RTP Residential Tenancies Program

OH&S Occupation Health & Safety

RTB Rental Tenancies Board

RTA Residential Tenancies Act

CMS Case Management System

C&E Compliance & Enforcement

DEI Diversity, Equity & Inclusion

FTEs Full-time Employee

RHEU Rental Housing Enforcement Unit (Ontario)

LTB Landlord and Tenant Board (Ontario)

Executive Summary

COMPLIANCE AND ENFORCEMENT UNIT PLAYBOOK



Project objectives

Objectives

- Design a **compliance and enforcement division model for consideration by the NS Government** and accompanying implementation “playbook” for the Residential Tenancies Program to encourage landlord and tenant compliance with the Residential Tenancies Act.
- As this new model would run parallel to the existing RTP and hearing process, a key component will be to define and promote the respective eligibility criteria for each.

Scope

- Review the legislative impacts of a new enforcement division.
- Review existing legislation and regulation in other jurisdictions to help inform enforcement and compliance options.
- Design a compliance and enforcement division operating model, including staffing, IT, policy/procedures, and budget.
- Create a detailed plan “playbook” with tangible steps to guide the implementation of the enforcement division.

Guiding principles

The following guiding principles were developed based on discussions with interested parties, engagement with other jurisdictions, and the SNS-IS project team. They were then used to guide development of options.

A compliance and enforcement unit should...



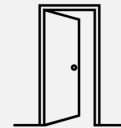
Balance the rights of tenants and landlords to ensure fairness and equity, but also recognizing that power imbalances often exist between these parties



Enhance system capacity and relieve pressure on the existing Residential Tenancies Program



Promote deterrence and early resolution



Be simple and easy to access



Be able to act quickly to resolve emergency or high-priority situations



Be cost-effective and provide good stewardship of public funds

Definitions

Sometimes, landlords and tenants have disputes. If either party is not obeying the rules or obligations set out in the RTA, then the Government of Nova Scotia has the right to take action to ensure that all parties are acting in accordance with the RTA.

Compliance

What does “Compliance” mean?

- Encouraging a tenant or landlord to **voluntarily** adjust a situation or behaviour to obey the rules and obligations included in the RTA.
- This could be achieved with tools such as the provision of information or interventions by Residential Tenancy government employees.

Enforcement

What does “Enforcement: mean?”

- **Ensuring** that any party who is not obeying the RTA, and refuses to voluntarily adjust a situation or behaviour, is **brought into compliance**.
- This could be achieved with tools and forcible measures such as investigations, charges, or financial penalties by Residential Tenancy government employees.

Goal: To ensure that tenants and landlords act in compliance with the NS Residential Tenancies Act (RTA)

Recommendation

Recommended Option to Implement a CEU

That SNS-IS **implement a compliance and enforcement unit (CEU) for residential tenancies** which will report to the Director of Residential Tenancies within SNS-IS.

This CEU is proposed to focus on deterrence and early resolution of complaints.

Here are the key CEU model components:

- Introduction of an up-front Tier 2 call centre staffed with Information Officers to answer questions, provide information about the Residential Tenancies Act, and triage complaints into the RTP (existing) or CEU (new) streams for resolution
- Implement the enforcement of offences against the RTA that are: repeated, urgent, and/or egregious
- Create CEU cases to be managed by Investigation Officers to promote early resolution of complaints, incent compliance, to investigate cases, collect and manage evidence, and to recommend cases for charges or penalties based on evidence gathered
- Create both an administrative penalty and information charge model in legislation, then implement information charge model into practice.
- Implement significant monetary penalty amounts to accompany the court charges. Publish/make the information related to charges and penalties available to the public

Recommendation

Investment Required to Implement a CEU

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Investment required to implement a Compliance and Enforcement Unit is:

Between \$1.1 - \$1.5 Million **one-time** to create and implement the CEU

Commit to **ongoing staffing & operating cost** allocation for the CEU:

- 2023-2024: \$736 – 836 Thousand
- 2024-2025: \$1.3 – 1.4 Million
- Ongoing Annual: \$1.5 Million

Approve **10 new FTE positions**:

- 1 Manager
- 1 Supervisor
- 4 Information Officers
- 4 Investigation Officers

Alternatives considered

Alternative 1

That SNS-IS maintain the current Residential Tenancies Program and implement a Tier 2 Information and Early Resolution function for Residential Tenancies.

Pros

- Smaller investment required than implementing a full CEU
- New staff added to provide information and encourage earlier resolutions
- Some incentive for landlords and tenants to resolve disputes early
- Won't create confusion or need for triage between the two streams (RTP, CEU) for resolution

Cons

- Lack of “teeth” on contentious issues, repeated non-compliance, and serious events
- Little to no deterrence of offences
- Missed opportunity to gain efficiencies in residential tenancies.

Alternatives considered

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Status quo

Maintain the status quo in residential tenancies.

Pros

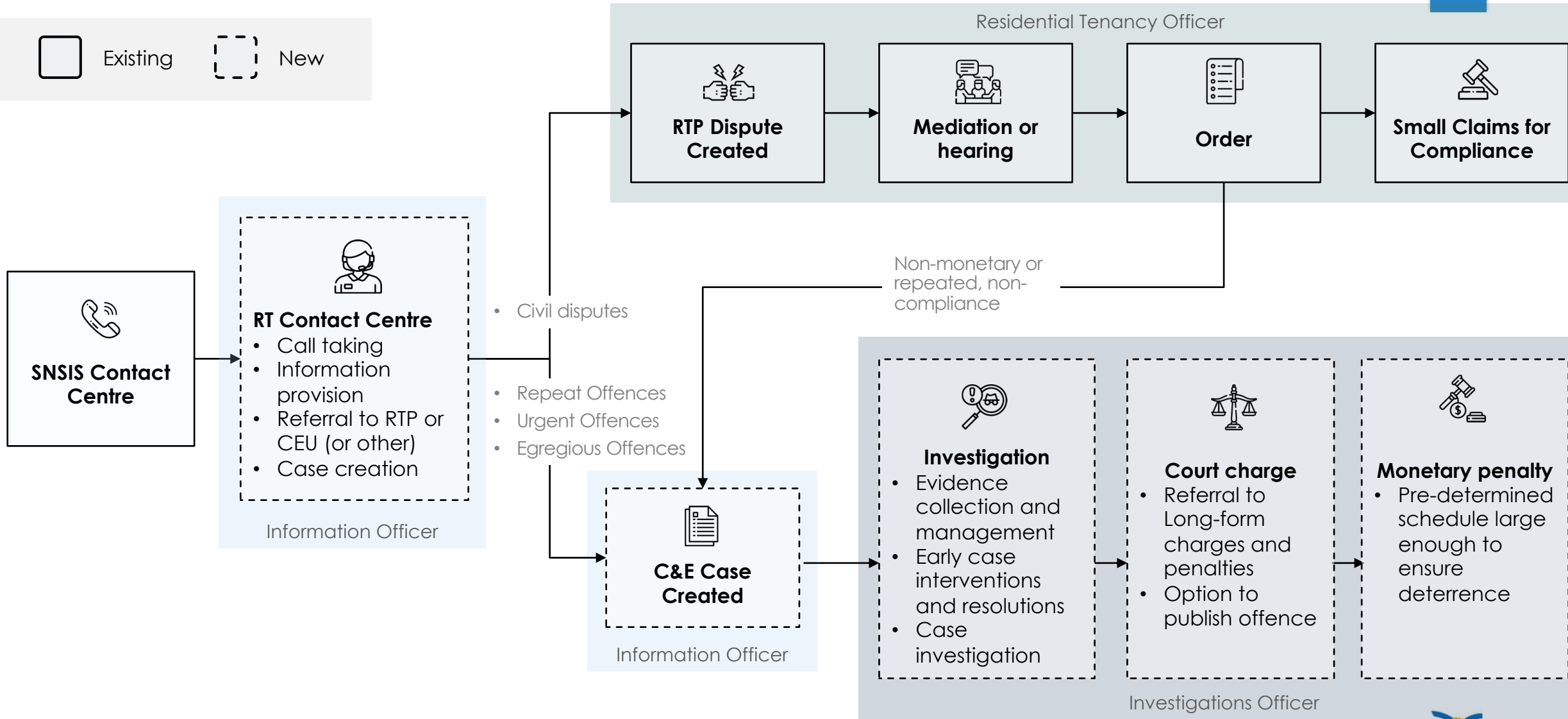
- No change to current budget
- No change to additional staffing
- Won't create confusion or need for triage between the two streams (RTP, CEU) for resolution

Cons

- Lack of "teeth" on contentious issues, repeated non-compliance, and serious events
- Little or no incentive for landlords and tenants to resolve disputes early
- Little or no deterrence of offences
- Missed opportunity to gain efficiencies in residential tenancies.

High-level client journey

Existing New



Implementation roadmap

The following highlights key deliverables and the high-level timeline for implementation *

* Implementation is contingent of receiving approval by the Government of Nova Scotia to implement a CEU.

I. Implementation Initiation

– May

Create alignment on deliverables, timeline and approach, engage on government direction

II. Discovery and Preparations

June – July

Start the process of staffing, technology, policy development and legislative drafting

III. Building and Hiring

Aug – Nov

Developing needed technology and training curriculum, hiring and onboarding new staff

IV. Training and Testing

Dec – Jan

Training new staff, testing developed technology and preparing for all-stream implementation

V. Prepping for Implementation

Feb – Mar

Implementing all workstreams and Service Go-Live

Go-Live
March 1, 2024

May
2023

June

July

Aug

Sept

Oct

Nov

Dec

Jan
2024

Feb

Mar

Implementation resources and costs

Professional services: \$600k - \$800k

- Project Management
- Process, Policy, and Legislation Design & Analysis
- Change Management and Communications
- Training
- Program Evaluation

Technology: \$500k - \$1.5M

- Phone System
- Case Management
- Digital Intake

Total: \$1.1M – \$2.3M

Estimated percent of time needed from client resources for implementation (not included in cost):

- Subject Matter Expert: 50 to 75% of FTE
- Director, Residential Tenancies: 20%
- Policy Analyst: 50% of FTE
- Legal resources: 10% of FTE

Limitations

Due to the scope and duration of the project, some service design elements and cost estimates are forecasted based on the best available information at that time. Several areas should be validated and refined in greater detail as part of any implementation plan.

These areas include:

- The existing RTP case management system (TIMS) is being replaced and is estimated to take 2 years for development and implementation – therefore, integration capabilities with that system are currently unknown.
- Held initial conversation with NSDS, and detailed technology resourcing has not been decided and therefore, high-level estimates were provided for technology costs at this time
- Held initial conversation with SNS-IS Call Centre to explore the feasibility of collaborating and partnering on the Tier 2 Call Centre establishment.
- Held initial conversation with NS Public Prosecutions to explore the feasibility of collaborating and partnering on the investigations and potential court charge model.

Wherever possible, the project team used current or best practices from other units within SNS-IS for similar functions, forecasting, or requirements such as staffing classifications, operating cost estimates, etc.

Approach

Assumptions and Considerations

COMPLIANCE AND ENFORCEMENT UNIT PLAYBOOK



Assumptions

Options were developed with the following assumptions in mind about the **role** of the CEU

- The Compliance and Enforcement Unit (CEU) should be a **separate stream** to the existing RT Program process, becoming involved in **high-urgency situations** such as illegal evictions/lockouts, disconnection of vital services, or repeated/egregious offences.
- Ontario's Residential Housing Enforcement Unit was the leading model studied.
- The CEU should also serve to **better enforce RTP decisions** by providing a mechanism for departmental action in cases of non-compliance.
- SNS-IS indicated preference for a summary offence ticket system, but all other potential options were also studied.

Assumptions

Options were developed with the following assumptions in mind about the **operations** of the CEU

- 8 months of implementation will occur in 2023-24 financial year, and 4 months of implementation will occur in 2024-25 financial year.
 - 8 months of staffing will be needed in 2023-24 financial year for the CEU Manager and Supervisor to hire the remaining staff and assist with the implementation of the CEU.
 - 6 months of staffing will be needed in 2023-24 financial year for the CEU for the Information and Investigation Officers for onboarding, training and preparing to implement the CEU operations.
 - Internal SNS-IS resources were identified for implementation, but their time was not included in implementation costs.
- High-level technology costs have been estimated and included based on best practices and initial conversations with technology partners. It is recommended that these costs be verified in more detail should the project progress to the implementation stage.
 - The cost of public prosecutions partnership was sourced but not included in the start up or ongoing costs until the amount of time required by a prosecutor each year is better determined.

Diversity, Equity & Inclusion considerations

Key themes

- Building trust and credibility with partners and the public
- Access: to support, to the legal system, etc.
- Centers of power and power dynamics in landlord, tenant relations
- Government of NS as largest landlord in NS

Scope

Those who are vulnerably housed & intersectionality of marginalized groups:

- Mi'kmaq
- African Nova Scotian
- LGBTQ2S Community
- Newcomers
- Tenants facing affordability challenges
- Clients of the Department of Community Services

Diversity, Equity & Inclusion considerations



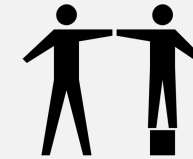
Quality of life & basic rights

- Tenants are always at a greater risk than landlords in the tension and issues that arise, as it concerns tenant's right to housing, safety and security
 - It leaves many at the risk of homelessness
- However, we recognize that ensuring human rights is a systemic challenge, beyond the scope of an enforcement division model



Inherent power imbalances

- There are socio-economic conditions, and access to resources that result in imbalanced power between tenants and landlords.
- There are further differences in experience for tenants who are low-income, older adults, part of the LGBTQA+, and/or BIPOC, who face additional barriers such as discrimination.

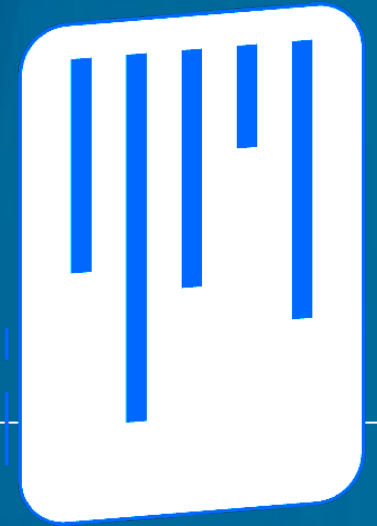
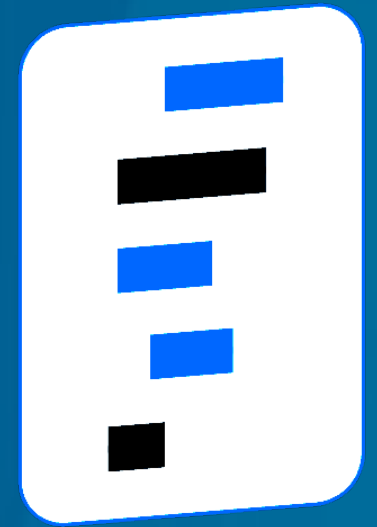


Ensuring equity

- Understanding the differences between:
 - Tenant experience based on intersectional identities
 - Large corporate LL's and smaller LL's
 - Land lease communities and rental/income properties
- Ensuring an impartial investigation and decision making

Background and Context

COMPLIANCE AND ENFORCEMENT UNIT PLAYBOOK



Overview

Overview of the current state and context

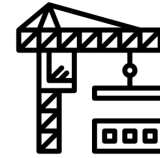
- In Nova Scotia, approximately 1/3 of all households rent.
- The purpose of the *Residential Tenancies Act* is to provide landlords and tenants with an efficient and cost-effective means for settling disputes.
- The dispute resolution process is complaint-driven, through application submission, using mediation and/or adjudication.
- The program provides information and educational material outlining rights and responsibilities.
- Any appeals after the resolution process are under the jurisdiction of the Small Claims Court.
- Currently, in Nova Scotia, there is a Residential Tenancies Program but no standalone Compliance & Enforcement Division. Enforcement of Director's Orders is performed through NS Sheriff Services.
- Stakeholders have started to vocalize interest in the use of compliance and enforcement for repeat and egregious offences.

RTP issues and pain points

Overview of the current state and context



The rental market is growing – nationally at 21.5% last year; this will increase rental units and complaints and strain resources that address complaints. (Stats Canada)



60% of all new residential construction in NS since 2016 is slated for rental units, yet vacancy rates remain at an all-time low. (Stats Canada)



The time it takes for hearings and Director's Orders to be issued takes time (currently about 2 months) and some complainants remain unsatisfied by the outcomes. (SNS)



Some stakeholders feel that there are no consequences for repeated or egregious violations of the RTA, and Director's Orders can be difficult or impossible to enforce. (SNS)

NS rental market

Snapshot of the current state of the rental market



Current state of market

The state of the market and consequent pressures may be driving landlord and tenant behaviour that might otherwise be avoided or prevented, given:



- Lack of available and affordable housing
- Low vacancy rates



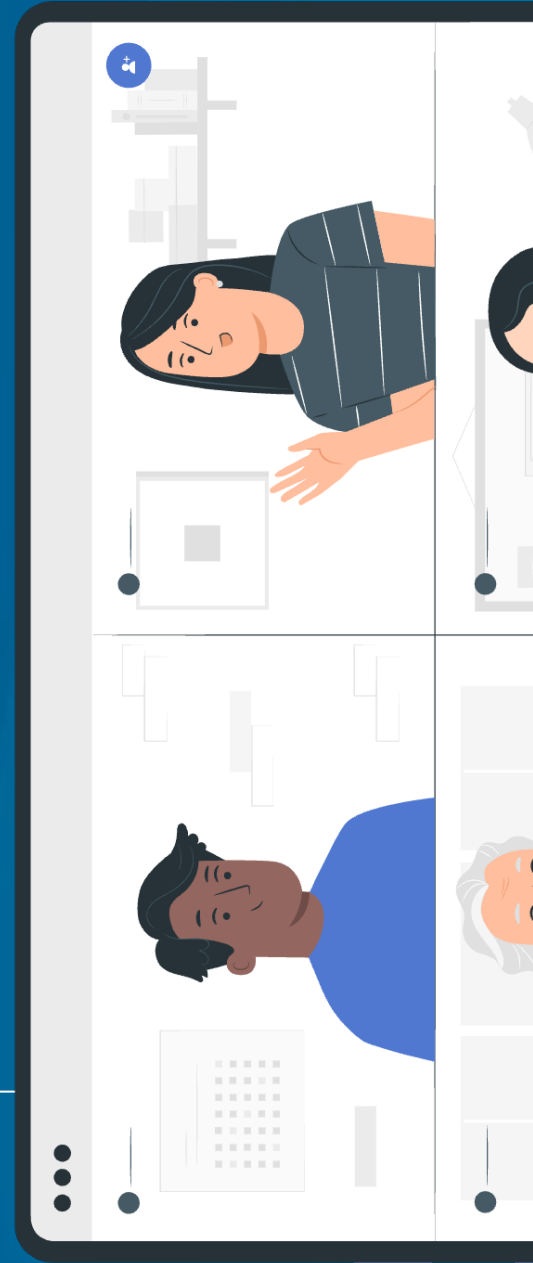
- Rising cost of living
- Rent increases
- Wages not keeping up with inflation



- Historically unregulated market
- Barriers to housing ownership

Engagement

COMPLIANCE AND ENFORCEMENT UNIT PLAYBOOK



Engagement map

Interested Parties

- Actively involved
- Subject matter expertise

Impacted/Impacting Parties

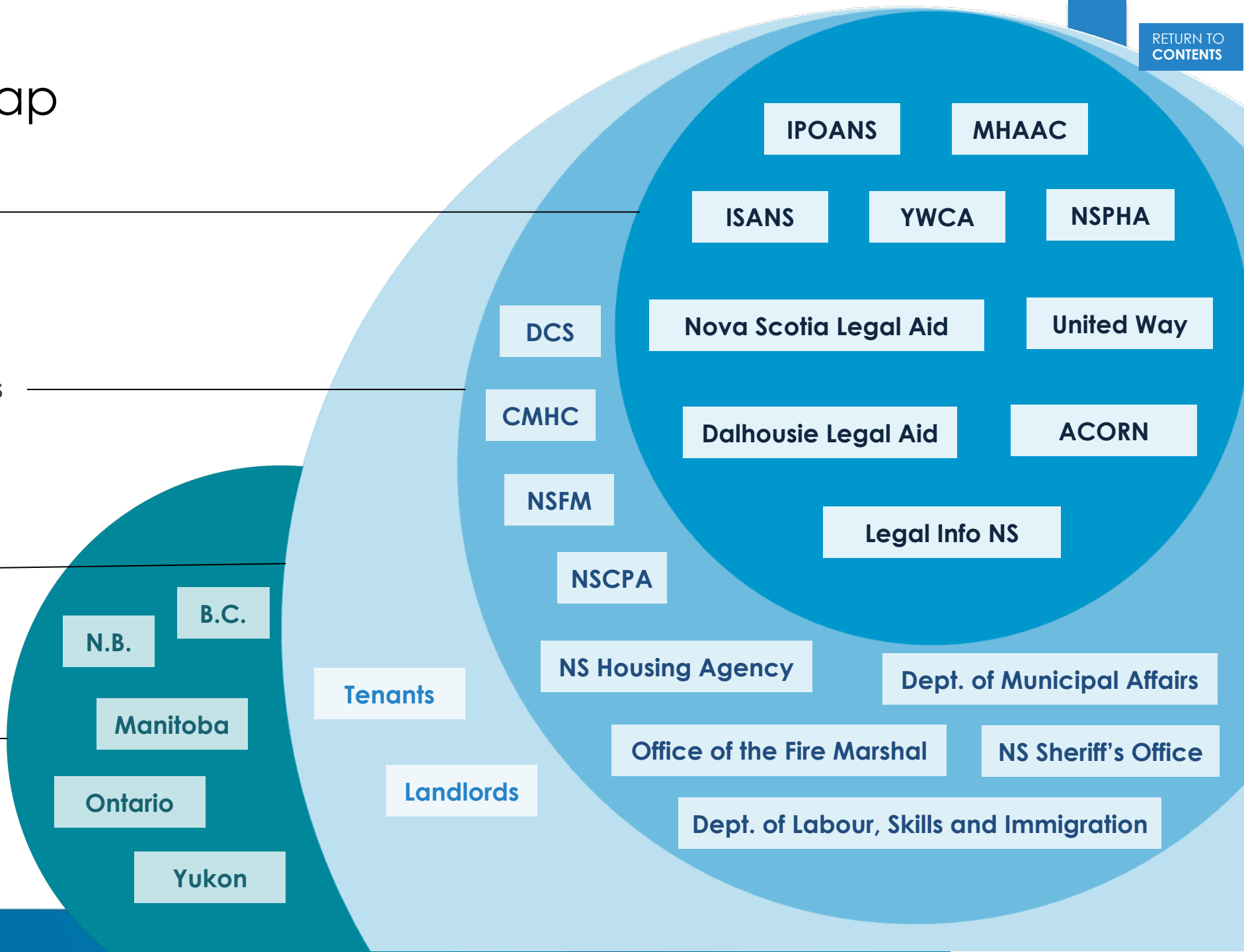
- Consulted
- Subject matter expertise

Targeted Engagement

- Kept in the loop
- Lived experiences

Jurisdictions Engaged

- Precedent analysis
- Case studies or lessons learned



Interested parties

Objective

- Provide opportunity for input
- Tap into subject matter expertise and network

Key Message(s)

- 'We want to hear from you!'
- 'Let's work together!'

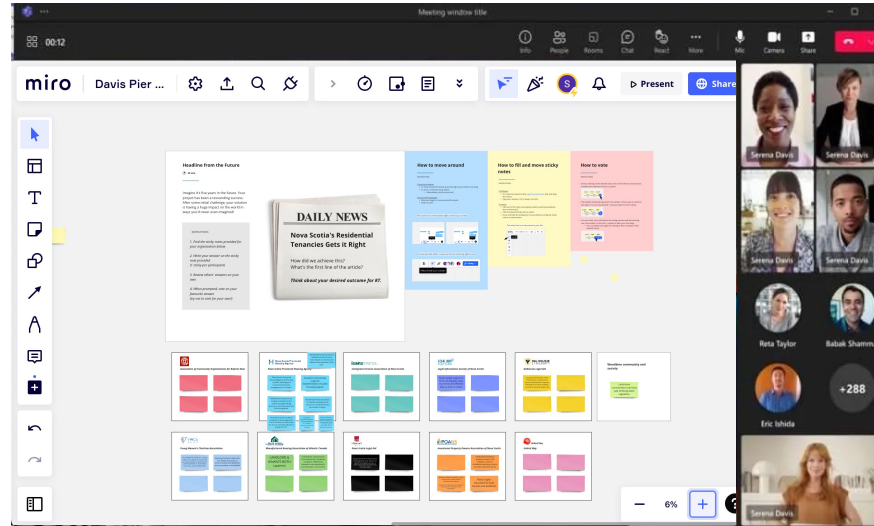
Platforms used



Microsoft Teams
Meeting platform



Miro
Collaborative whiteboard platform



Agenda | **Jan 05, 2023**
9AM-12PM (AST)

1. Icebreaker activity

- Vision setting
- Demo & practice Miro skills

2. Understanding the Current State

- a) Common disputes
- b) Current pain points

3. Crafting an Ideal Future State

- What should be enforced?
- What are the ideal outcomes?
- What 's important to consider?

Interested parties

Engagement output

Understanding of **pain points within the current system** and the RTP Program, such as:

- Backlog, potentially enduring months more of inadequate conditions/behaviour
- Support services (e.g. legal aid) facing challenges meeting the increase in demand and volume
- Hearing processes unfair to tenants who consequently cannot access legal support
- Lack of enforcement for compliance and deterrence for future bad behaviour

Understanding of pain points experienced

- The type and frequency of disputes between landlord and tenants that needs to be enforced by the CEU model and addressed with urgency

Understanding user needs is critical to ensure that the service is:

- ***Desired by its intended users***
- ***Worth the investment***
- ***Designed to alleviate and address current pain points and gaps***

Impacted/impacting parties

Objective

- Understand lived experiences (needs, desires, pain points, barriers)

Key Message(s)

- ‘How can we create a solution that works for you?’

Platforms used



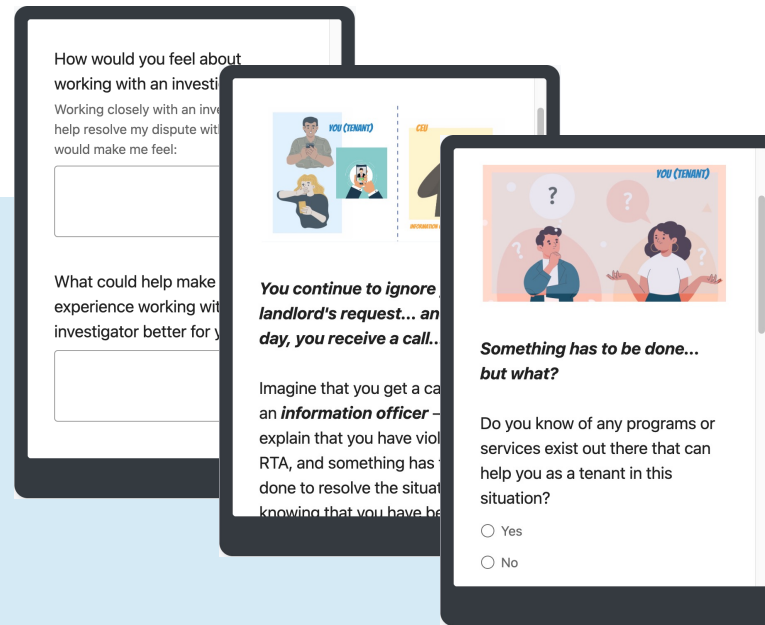
Microsoft Teams

Meeting platform



Simple Survey

Canadian cloud-based data collection & analysis software



12-page worksheet presenting two scenarios:

1. POV as a complainant

imagine that you need to file a complaint against your landlord/tenant..

2. POV as a respondent

imagine that your landlord/tenant is filing a complaint against you

Activities
Mar 6 - 12, 2023

Impacted/impacting parties

Engagement output

Understanding **user behaviour and expectations**, such as:

- How to reach your users based on the current services/programs they rely on
- Intake method preferences to gauge uptake
- Process expectations for the overall Residential Tenancies program, as well as the CEU model
- Current barriers and potential causes of disputes between landlords and tenants
- Important resources and information as desired/demanded by landlords and tenants
- Ways to motivate compliance and identifying differences between landlords and tenants
- Helpful suggestions, questions and ideas for ways to solidify and enhance the CEU model

Understanding user behaviour is critical to ensure that the service is:

- ***Accessible to the users***
- ***Designed or iterated to meet their needs***
- ***Delivering the optimal user experience***

CEU Development Policies and Procedures

COMPLIANCE AND ENFORCEMENT UNIT PLAYBOOK



Policies, procedures and guidelines

This section gives an overview of policies, procedures and guidelines needed to operationalize the CEU

The purpose of CEU policy documents is to

- Define the goals, objective and approach of the CEU and enforcement actions
- Identify key activities of the CEU
- Ensure consistent application of the rules by staff
- Provide operational guidance, clarity and efficiency
- Provide the public with information and set expectations for the process
- Provide accountability, transparency and fairness in application of the rules

Policy and procedure requirements

The next 2 slides contain an overview of policy areas that will need to be defined to operationalize the CEU. These could be in one or multiple documents.

Stage	Supporting Policies, Procedures and Guidelines	Description
Intake	Intake Guidelines	Policy document containing guidelines on how complaints are received, triaged, and information captured at Intake stage. Sets expectations on how cases progress through the system, and how decisions are made to direct to RTP vs CEU.
	Intake Procedures	Documentation outlining how cases are entered, tracked, and managed within the technology system.
	Progressive Enforcement Framework	Policy to guide progressive enforcement action as warranted (e.g. verbal warning, written warning, referral for investigation, etc.)
	Residential Tenancies Policy Guides	Guides to assist the public and staff in understanding the rights and responsibilities of tenants and landlords under the RTA.

Policy and procedure requirements cont'd

An overview of policy areas that will need to be defined to operationalize the CEU. These could be in one or multiple documents.

Stage	Supporting Policies, Procedures and Guidelines	Description
Investigation	Investigation Policy	Policy document outlining conduct for investigation officers, including guidelines on how to assess/prioritize cases for CEU action, and guidelines for managing urgent situations.
	Case Management Procedures	Documentation outlining how cases are managed, tracked, and followed-up on.
Referral for Prosecution	Penalty Guidelines	Guidelines to ensure consistent application and determination of financial penalty amounts
Post-Prosecution	Publication Policy	Guidelines on publication of individuals convicted under the Act, including provisions on when names will be published and conditions for removal (e.g. after 5 years, if certain conditions are met)
General	Technology Procedures	Procedures supporting use of the case management system.

Triage policy development

SNS-IS will need to develop a robust risk-based, progressive enforcement framework that assists Information Officers with determining when issues go to the existing RTP or the CEU. This framework can also help guide prosecution decisions.

RTP

- Where a civil remedy or Order is sought (e.g. compensation, rent abatement, etc.)
- Where required by law (e.g. evictions, illegal rental increases)
- For most disputes requiring mediation

CEU

- Where the conduct is egregious or repeated (see next slide for defining “repeated” and “egregious”)
- Where the situation is urgent, requiring immediate intervention (e.g. lockouts, and disconnection from vital services)

Urgent offences

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There are situations that are considered an emergency and must be dealt with quickly. The Province of New Brunswick has developed good guidance for the triage and prioritization of urgent offences in their RTP. An initial list has been created but will need to be finalized in implementation.

It is recommended that “emergencies or urgent offences” may include, but are not limited to:

- Fire
- Flooding
- Active destruction of the premises
- Major leaks in pipes or roof
- Disconnected, damaged or blocked water, sewer pipes or plumbing fixtures
- Disconnection or issues with the primary heating system
- Disconnection or issues with the electrical system
- Damaged or defective locks, or an unauthorized lock change by landlord
- Immediate (same or next day) threat of eviction by the landlord, especially when children are involved

Egregious and repeated offences

Egregious and repeated offences will need to be defined.

It is recommended that SNS first create a broad list of potential offences under the *Act*, and then use policies and guidelines to determine which are referred for prosecution.

In British Columbia, the following factors are taken into account for decision-making, and evaluated on a case-by-case basis to determine whether enforcement action should be taken for egregious or repeated offences:

- **Previous enforcement actions** for contraventions of a similar nature by the person (including by other enforcement units e.g., bylaw or fire marshal)
- The **gravity and magnitude** of the contravention
- The **extent of the harm to others** resulting from the contravention
- Whether the contravention was **repeated or continuous**
- Whether the contravention was **deliberate**
- Any **economic benefit** derived by the person from the contravention (e.g. professional renters benefitting from fraud, improper renovations resulting in profit from increased rent)
- The person's **efforts to correct** the contravention
- **Past conduct** related to investigations and dispute resolution proceedings, failure to comply with Orders and/or giving false or misleading information

Any factors used to guide decision-making will need to be defined in policy to ensure equal application, fairness and consistency. Further engagement will be required to finalize this list.

Best practice: BC framework for investigations

Appendix A: Assessment Guideline

											Score
Number of previous enforcement actions for similar contraventions:											
0	1	2	3	4	5	6	7	8	9	10	
Number of repeated contraventions:											
0	1	2	3	4	5	6	7	8	9	10	
Number of days/weeks/months the contravention has continued:											
0	1	2	3	4	5	6	7	8	9	10	
Gravity and Magnitude											
0	1	2	3	4	5	6	7	8	9	10	
Extent of harm to others											
0	1	2	3	4	5	6	7	8	9	10	
Deliberateness											
0	1	2	3	4	5	6	7	8	9	10	
Economic benefit											
0	1	2	3	4	5	6	7	8	9	10	
Correction Efforts											
0	-1	-2	-3	-4	-5	-6	-7	-8	-9	-10	
TOTAL											

- SNS-IS should consider adopting a points-based policy framework in its Investigation Policy to guide decision-making for prosecution of offences, using both quantitative and qualitative factors.
- The guideline on the left is used by the BC administrative penalty regime to ensure consistent decision making and transparency in how enforcement action is taken.
- The guideline, as a policy document, is not binding and allows the Director discretion in decision-making.

Source: BC Administrative Penalty Policy

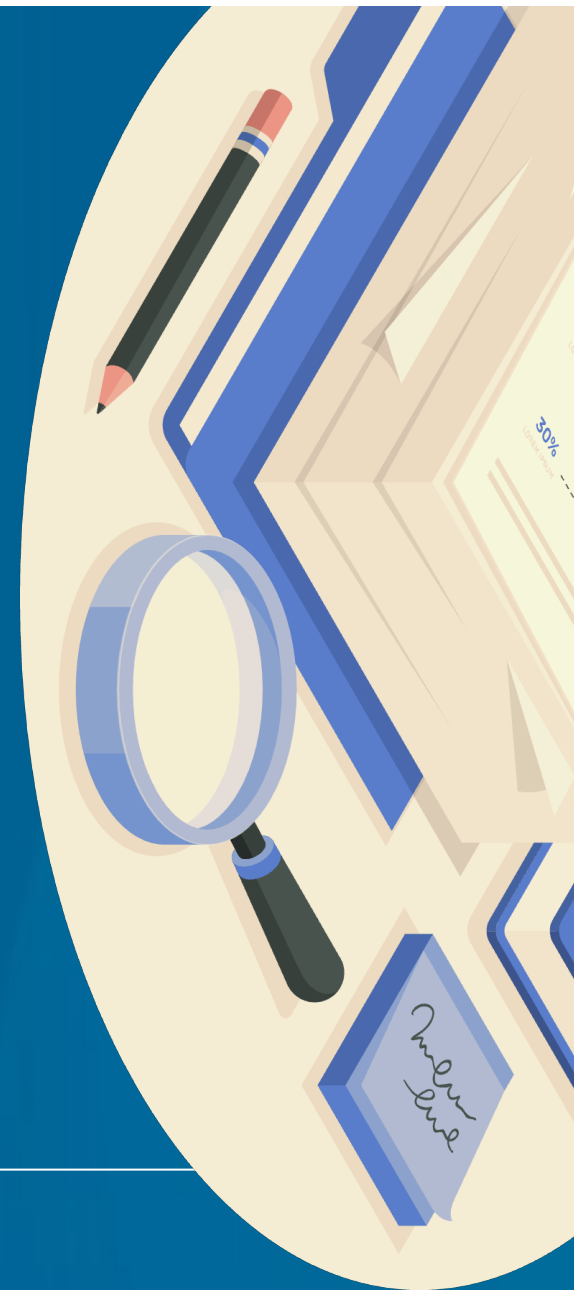
Policies, procedures and guidelines

Developing Policies and Procedures

- **Determine intake channels**
(e.g. online, in person, telephone)
 - Make updates to the existing website
- **Develop draft operational procedures**
- **Develop draft technology procedures**
- **Develop draft policies**
 - Identify requirements for policy and procedures
(operational, technology, procedural etc.)
 - Develop initial draft policies
 - Validate direction with stakeholders
(e.g. factors that should be taken into account for decision-making, use of hypothetical situations to test process)
 - Updates to existing forms and policies

CEU Development Legislative and Regulatory

COMPLIANCE AND ENFORCEMENT UNIT PLAYBOOK



Legislative and regulatory powers

This section describes the legislative provisions that will need to be enacted to enable the operation and implementation of a CEU. The three categories of powers are discussed on the following slides:



CEU-Enabling Powers:
general powers required
to enable investigations
and definition of offences;



Powers enabling an **administrative enforcement** model, and



Powers enabling a **criminal enforcement** model.

Legislative and regulatory

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CEU Enabling Powers

The first category of legislative changes needed to enable the operation of the CEU include:

- The Minister to conduct investigations, and to delegate those investigations to a department official
- Powers to support the conduct of investigations/operations of CEU, and limitations on when those powers can be used:
 - Right to entry (in exigent circumstances) (*existing right of entry in RTA s. 22A can be expanded to include for investigation purposes*)
 - Right to collect evidence (photographs/samples) as part of an investigation
 - Right of search and seizure (e.g. of documents) with a warrant
 - Right to order production of documents, including what the order must contain and conditions on orders
- Definition of other procedural steps as required

Authority

SNS Investigation Officers will need to be appointed as Special Constables under the *Police Act*. This appointment process is managed by Public Safety.

Legislative and regulatory

Statutory Limitations on Action

Limitations on when proceedings can be brought will also be required. Under the *Summary Proceedings Act*, the default limit is one year from the time of the offence. It is recommended that this time be increased to two years – this recognizes that investigations can be complex, and it may take time to gather enough evidence to bring charges.

Publication

A legislative provision allowing the publication of names of individuals or businesses convicted under the *RTA* will need to be created. Conditions around publication may also be defined within policy or legislation.

Legislative and regulatory

Define Offences

SNS may wish to define offences broadly to allow for future flexibility in application, even if it is not anticipated that the CEU will prosecute all offences. This will also act as a deterrent against defined behaviours. The CEU will focus on “urgent, egregious, or repeated” offences.

The following slides contain guidance on defining urgent, egregious, and repeated offences. Urgent offences can be characterized as those that represent a risk of imminent major property damage or risk to personal safety.

Egregious and Repeated offences are more difficult to define because they are characterized by the individual’s conduct. The approach taken in other jurisdictions has been to define many offences, but only pursue enforcement action when the conduct warrants it. Policy guidelines can be used to aid in decision-making and provide clarity to staff, landlords, and tenants.

SNS-IS should also consider a provision that makes corporate agents and directors personally liable for breaches of the *Act*, in line with other jurisdictions and current practice regarding security deposits per s. 12(13).

Draft list of *mens rea* offences

An initial, draft list of offences has been created based on the list of offences used in Ontario and British Columbia. Legislative provisions defining each offence will need to be created if implemented in Nova Scotia.

The following table contains a list of draft offences requiring knowledge (*mens rea*), followed by a draft list of offences not requiring knowledge (*strict liability*). The references to legislation in the table below indicate which areas of the existing legislation govern conduct related to the offence.

Offences Requiring Knowledge (mens rea)		
#	Offence (paraphrased – exact wording will need to be drafted)	Currently in Legislation?
Utility Disconnections, Lockouts, Seizures		
1	Withholding supply of vital service, care service, or food	
2	Alters locking system on entry door to withhold entry	s. 5A, 9(1)
3	Seizes any property of the tenant	s. 5(1)

Draft list of *mens rea* offences cont'd

Offences Requiring Knowledge (mens rea)		
#	Offence (paraphrased – exact wording will need to be drafted)	Currently in Legislation?
Improper Notice to Quit		
4	Provides false or misleading information in a Notice to Quit	s. 10
5	Recovers possession of a unit contrary to statutory requirements (e.g. not providing valid notice to quit, not going through RTP process for eviction)	s. 10
6	Recovers possession of a unit improperly by giving a bad faith notice to quit	s. 10
Harassment, Interference		
7	Harasses, hinders or interferes with a tenant such that they are induced to vacate the unit	s. 9(1)
8	Harasses, hinders or interferes with a landlord or tenant seeking relief through RTP or in a proceeding under the RTA	s. 22A (landlords only)

Draft list of strict liability offences

Offences Not Requiring Knowledge (strict liability)

#	Offence (paraphrased – exact wording will need to be drafted)	Currently in Legislation?
Breach of statutory conditions		
1	Enters a rental unit contrary to statutory conditions	s. 9(1)
2	Refuse to allow entry to landlord in breach of statutory conditions	s. 9(1)
3	Fail to maintain condition of premises in breach of statutory conditions	s. 9(1)
4	Tenant or person permitted by tenant recklessly or negligently causes damage to rental unit	-
5	Uses a lease contravening the standard form of lease and conditions prescribed in s. 8	s. 8
6	Improperly or unlawfully recovers possession of a rental unit	s. 10
7	Harasses, intimidates or threatens a tenant/landlord	-

Draft list of strict liability offences cont'd

Offences Not Requiring Knowledge (strict liability)		
#	Offence (paraphrased – exact wording will need to be drafted)	Currently in Legislation?
Fees and Security Deposits		
8	Requires a tenant to pay rent increase or other fees in contravention of the Act	s. 9(1), 11
9	Fails to return a security deposit	s. 12
10	Charges a security deposit in an amount greater than allowed in the Act	
11	Charges an application fee or other fee in contravention of s. 6(1)	s. 6(1)
Seizure and Improper Disposal of Property		
12	Fails to make an evicted tenant's property available for retrieval	s. 5(1)
13	Improperly disposes of an evicted tenant's property	Reg 24(1)

Draft list of strict liability offences cont'd

Offences Not Requiring Knowledge (strict liability)		
#	Offence (paraphrased – exact wording will need to be drafted)	Currently in Legislation?
Procedural		
14	Fails to comply with an order of the Director (incl. production order, work order)	s. 6E, 10AD, 17
15	Obstruct/interferes with investigator or investigation	s. 22A
16	Furnishes false or misleading info to RTP/CEU	-
17	Attempts of any offence listed in this Act	-
18	Any contravention of the Act	s. 23

Legislative and regulatory

Criminal Offence Provisions

To enable a criminal system, SNS-IS will need to amend the legislation to:

- Enable a penalty upon summary conviction (consider modifications or repeal of existing s. 23)
- Define new maximum penalty amounts
- Modify the rules of evidence (*if required*)
- Review Attorney General consent requirement for prosecution under s. 24 of RTA

Appeals

Unlike in an administrative system, procedural rules are already laid out in the *Criminal Code* and *Summary Proceedings Act*. Appeals will follow the established Court appeal process, generally to the Nova Scotia Supreme Court for summary conviction offences.

Define Fine Amounts

Fines would typically determined by the prosecutor/judge, based on prior cases. SNS should work with Crown Prosecutors to decide amounts to be pursued

The maximum fine amount should be prescribed by law: in Ontario, it is \$50k/individual & \$250k/corporation, but practices vary across jurisdictions.

Legislative and regulatory cont'd

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Administrative Powers

To enable an administrative penalty system, SNS-IS will need to create additional provisions that:

- Grant the power for SNS-IS to levy administrative penalties
- Grant delegated authority to an administrative decision maker
- Define penalty amounts, and considerations for determining the penalty
- Establish fair procedures in the *Act* and *Regulation*, outlining:
 - The burden of proof
 - Notice and the opportunity to be heard (via oral or written submission)
 - Requirement for written reasons for decisions
 - Factors to be taken into account when making decisions
- Administrative systems do not necessarily require a statutory right to appeal, but there is an inherent right of superior courts to judicial review.

Defining Penalty Amounts

- Administrative systems allow for a per-day penalty to be levied. A maximum fine amount should be set in line with the criminal provisions.

Financial penalties in other jurisdictions

Practices in studied jurisdictions for penalty amounts and publication policies:

Province	Max Penalty (Individual)	Max Penalty (Corporation)	Publication?
Ontario Rental Housing Enforcement Unit (Charge Model)	\$50,000	\$250,000	Yes, on RHEU Website
Ontario Landlord and Tenant Board (Administrative Penalty Model)	\$10,000	\$10,000	Yes, in Board decisions
BC (Administrative Penalty Model)	\$5,000 per day, repeating until compliance is reached	\$5,000 per day, repeating until compliance is reached	Yes, on BC Compliance and Enforcement Unit Website
Manitoba (Administrative Penalty Model)	\$5,000	\$5,000	Yes, on Compliance Unit Website

Administration of fines:

- One-time penalties generally pair best with a charge model for decision-making
- Daily penalties require resources to check on status and progress daily or to gather evidence on the daily status of non-compliance.

Legislative and regulatory

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Legislative Implementation

- I. Validate draft list of offences with stakeholders (e.g. tenants, landlords, NS Justice, other jurisdictions)
- II. Develop draft Request for Legislation for Fall sitting
- III. Develop report and recommendation for Regulation changes to Executive council (3 months for drafting/approval – begun once legislation passed)
- IV. Monitor progress through legislative progress, consultation and implementation

CEU Development Staffing

COMPLIANCE AND ENFORCEMENT UNIT PLAYBOOK



CEU STAFFING MODEL DEVELOPMENT

The following section outlines the staffing requirements for the CEU, including:

Staffing model

Roles and responsibilities

FTE analysis

Key candidate attributes for hiring consideration

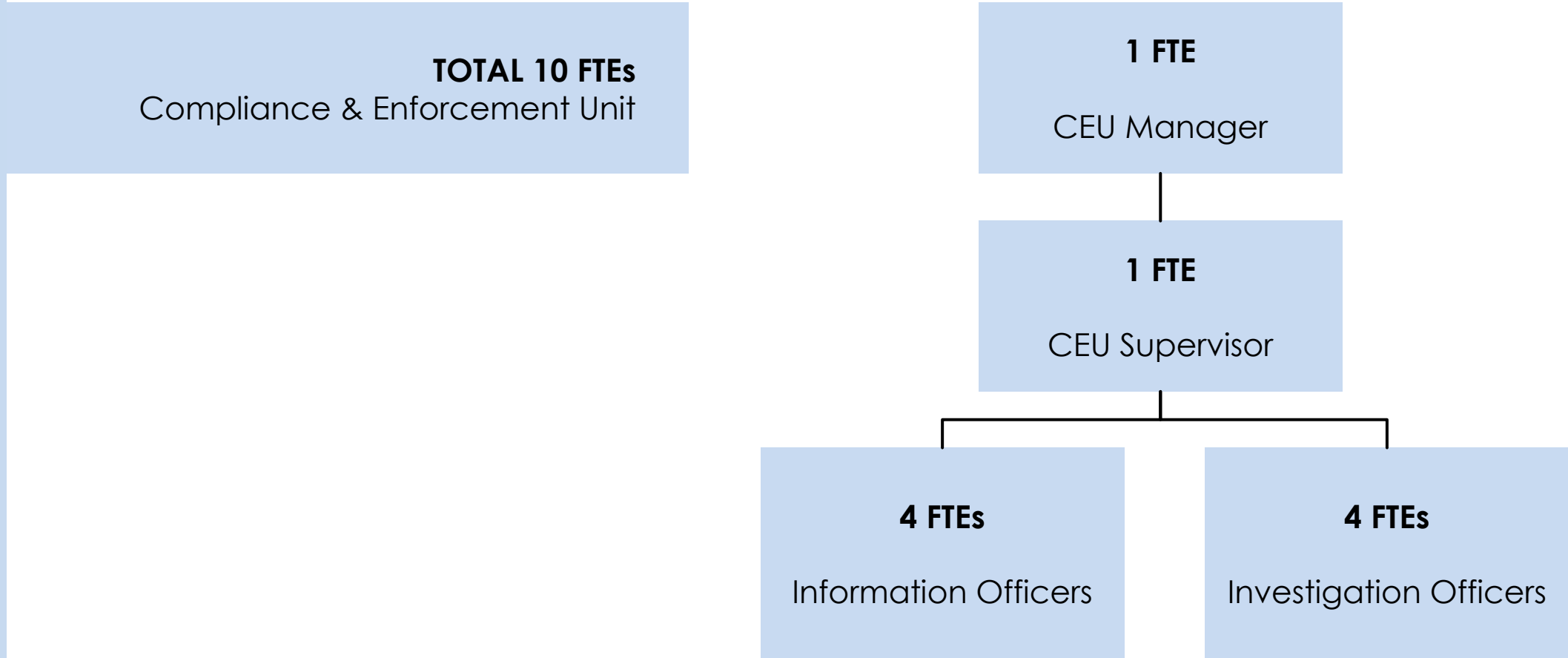
Recommended job classifications

Recommended staffing locations

High-level hiring process and considerations

Staffing model

The diagram below illustrates the proposed staffing complement.



Roles and responsibilities

The following table outlines the responsibilities of the suggested roles in the unit

	Responsibilities	Volume of work
Information officer	<ul style="list-style-type: none"> Operate phone line for all Residential Tenancy-related calls Provide information to callers about their rights and responsibilities under the RTA Direct callers either to the CEU, RTP, or other supports/services outside of SNS Create cases for CEU complaints to be assigned to Investigation Officers Document complainant's situation with a case note 	~16,000 complaints through phone and online
Investigation officer	<ul style="list-style-type: none"> Review complainants' situations and conduct early intervention practices through calling all involved parties Collect evidence through receipt of e-documents or in-field collection Issue warnings and attempt to resolve disputes through voluntary compliance Prepare court briefings and long form information to support the prosecution of cases, as needed 	<ul style="list-style-type: none"> 1,400 low effort cases 180 medium effort cases 16 high effort cases 4 cases to prosecution
Supervisor	<ul style="list-style-type: none"> Manage day-to-day operations of the CEU Provide support to Information and Investigation Officers Report on CEU operations to CEU Manager 	<ul style="list-style-type: none"> No direct client interaction Management of 8 staff
Manager	<ul style="list-style-type: none"> Responsible for overall success and operations of the CEU Responsible for CEU operating budget Provide support to CEU Supervisor Report on CEU operations to Director 	<ul style="list-style-type: none"> No direct client interaction Responsible for team/budge

FTE analysis

60



Information Officers

- **16,000 complaints** through phone and online (both RTP & CEU) x 15 minutes = **240,000 working minutes per year**
- 7 hour working days, with maximum phone occupancy of 85% and working efficiency of 70%
- **Results in 4 FTEs**



Investigation Officers

- **1,600 total CEU cases**
 - Low effort (quick compliance): 1,400 cases x 2 hours
 - Medium effort (medium compliance): 180 cases x 6 hours
 - High effort (slow, but eventual compliance): 16 cases x 26 hours
 - Prosecutions: 4 cases x 36 hours
- **266,400 working minutes per year**
- 7 hour working days, working efficiency of 70%
- **Results in 4 FTEs**

Key candidate attributes for hiring consideration

The following attributes should be considered in the development of job postings and through the interview selection process.

Successful **Information Officers** should have the following attributes:



Information Officers

- Ability to interpret and apply relevant policies, procedures, regulations and legislations (e.g., RTA) to various situations and explain interpretations to the public
- Demonstrated strong analytical, reasoning and client communication skills to listen to inquiries and complaints, establish and assess facts relevant to complaints, and provide options
- Strong interpersonal and conflict-management skills
- Ability to deal with individuals from a variety of backgrounds under stressful situations

Key candidate attributes for hiring consideration

The following attributes should be considered in the development of job postings and through the interview selection process.

Successful **Investigation Officers** should have the Information Officers attributes and the following:



Investigation Officers

- Enforcement background an asset – understanding of legal process, evidence collection, and inspections and investigations
- Strong negotiation, interpersonal and conflict management skills to resolve alleged offences with landlords, tenants and other parties in a friendly and customer-focused manner within confines of specific legislation
- Strong planning and organizational skills to assess urgency and set priorities for cases
- Ability to prepare correspondence, statements, compliance and intervention letters, and court documents

Recommended job classifications

The table below outlines the recommended job classifications for staff in the new CEU

Role	Recommended classification	Rationale
Manager	EC 12	Recommend hiring for EC 12 to accommodate the potential to manage a budget and to ensure the job posting is compelling to high quality applicants
Supervisor	TE 26	Requires understanding of RTA and expertise in enforcement to support their staff. Requires a classification high enough to supervise the Information Officers and Investigation Officers
Information Officers	PR10	Requires understanding and interpretation of RTA as well as the RTP and CEU processes and a general knowledge of adjacent bylaws and legislation
Investigation Officers	TE24	Aligned with the classification of Alcohol & Gaming investigators

These classifications will need to be confirmed with HR and the appropriate unions.

Recommended staffing locations

The table below outlines the recommended locations for staff in the new CEU

Role	Recommended locations	Considerations
1 Manager	<ul style="list-style-type: none"> HRM 	Co-located with other SNS managers and Director
1 Supervisor	<ul style="list-style-type: none"> HRM 	Co-located with Manager and majority of staff
4 Information Officers	<ul style="list-style-type: none"> HRM 	Could be a remote team, but recommended to be together and in the same location as the Supervisor
4 Investigation Officers	<ul style="list-style-type: none"> 2 in HRM 1 in Eastern (recommend Sydney) 1 in Western (recommend Kentville) 	<ul style="list-style-type: none"> Based on population by region and distribution of historical in-person RTP applications Consideration could be given to locating all 4 Investigation Officers in HRM to be co-located with other team members. This option would require additional travel but is aligned with other jurisdictions (Manitoba and Ontario have all investigators co-located)

Additional analysis should be completed during the implementation phase to confirm the optimal locations for staff, and may require additional considerations such as available office space.

High-level hiring process and considerations

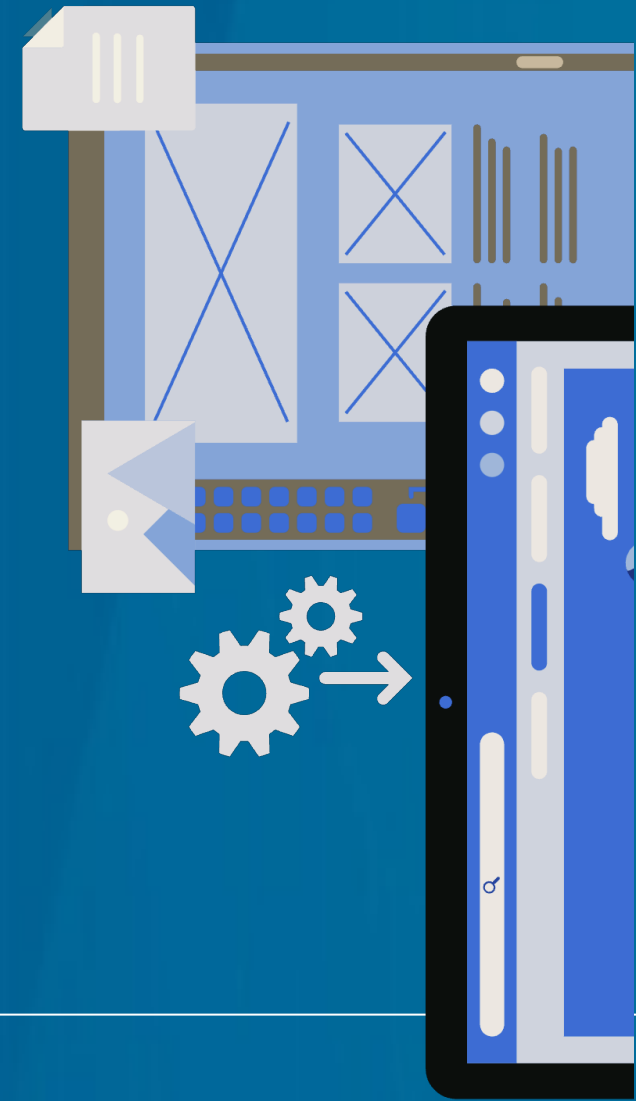
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|--|---|--|
| 1. Submit roles and responsibilities details (with suggested classifications) to HR for independent review | 2. Once job classifications have been confirmed, create and finalize job descriptions | 3. Create job requirements and job postings, and post jobs |
| 4. Review applications – shortlist and interview | 5. Letters of offer, notification to candidates | 6. Onboarding |

Consider hiring CEU Manager and Supervisor before hiring other staff to allow the Manager and Supervisor to:

- Be a part of the creation of internal processes and work standards
- Undergo technology training before their staff, allowing them to support their staff through training and have a strong understanding of their staff's workflow and processes
- Allow for additional managerial/supervisory training
- Be involved in the hiring of their staff

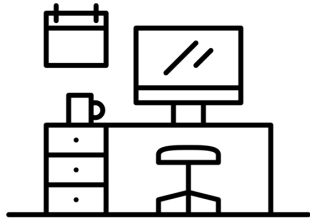
CEU Development Equipment and Operations

COMPLIANCE AND ENFORCEMENT UNIT PLAYBOOK



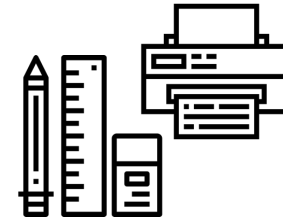
Equipment and operations

The following items are primarily costed out as office space, travel and equipment costs, with an additional line item for investigation-related travel



Standard employee operational requirements apply to all FTEs required for the CEU, including:

- Office space
- Location access for employees
- Computers, phones, and internet
- Office equipment and furniture
- Travel



The unit has additional requirements related to in-field investigations, including:

- Travel requirements
- Safety equipment (minimal safety equipment is required, but may include Trunk Mobile Radios)

CEU Development Training

COMPLIANCE AND ENFORCEMENT UNIT PLAYBOOK



Training plan process

Define

- Identify impacted roles needing training
- Identify learning objectives for each role
- Define curriculum areas that will address learning objectives
- Review best practices for similar training needs within SNS-IS and NS Government

Develop

- Develop or source the content for the curriculum planned
- Determine the delivery format (self-paced, instructor led, etc.)
- Source or procure resources needed for development and delivery of training (trainer, location, equipment, etc.)
- Partner with others in SNS-IS and NS Government who may need similar training for cost-efficiencies
- Consider long-term accessibility to training

Deliver

- Deliver the training to employees according to the plan
- Log and store any credentials or certificates of completion gained through the training
- Identify if any training gaps still remain

Sustain

- Put in place a process to keep training up to date and available to any employee who may be onboarded following Go-Live of the service. (such as capture/online modules)
- Identify ongoing training needs or recertifications that may be required and a plan to ensure future delivery.

High-level training plan

Recommendations for components for CEU staff training plan includes:

All CEU Staff

- Residential Tenancies Act, RT offences
- RT program, polices & Guiding principles
- Roles & Responsibilities for Landlords and Tenants
- Customer service, DEI, de-escalation techniques
- Technology systems used
- Evidence storage and tracking correspondence
- Case Creations, escalations, and triage between CEU and RTP
- Desired service standards and efficiency
- Relationship with the police, fire marshals and building inspectors - triage and escalations

Role-Specific Training

Information Officers:

- Call taking
- Queue management
- Call Centre service standards

Investigation Officers:

- Case resolution best practices
- Investigations Protocol
- Evidence collection
- Safety & OHS (for in-field personnel)

Updating/Cross Training

The following roles may need updated/minimal training due to changes from the CEU implementation:

- Alcohol & Gaming if needed for overflow in inspections
- Residential Tenancy Program staff on relevant updates
- SNS-IS Call Centre staff on new call routing and updated program information

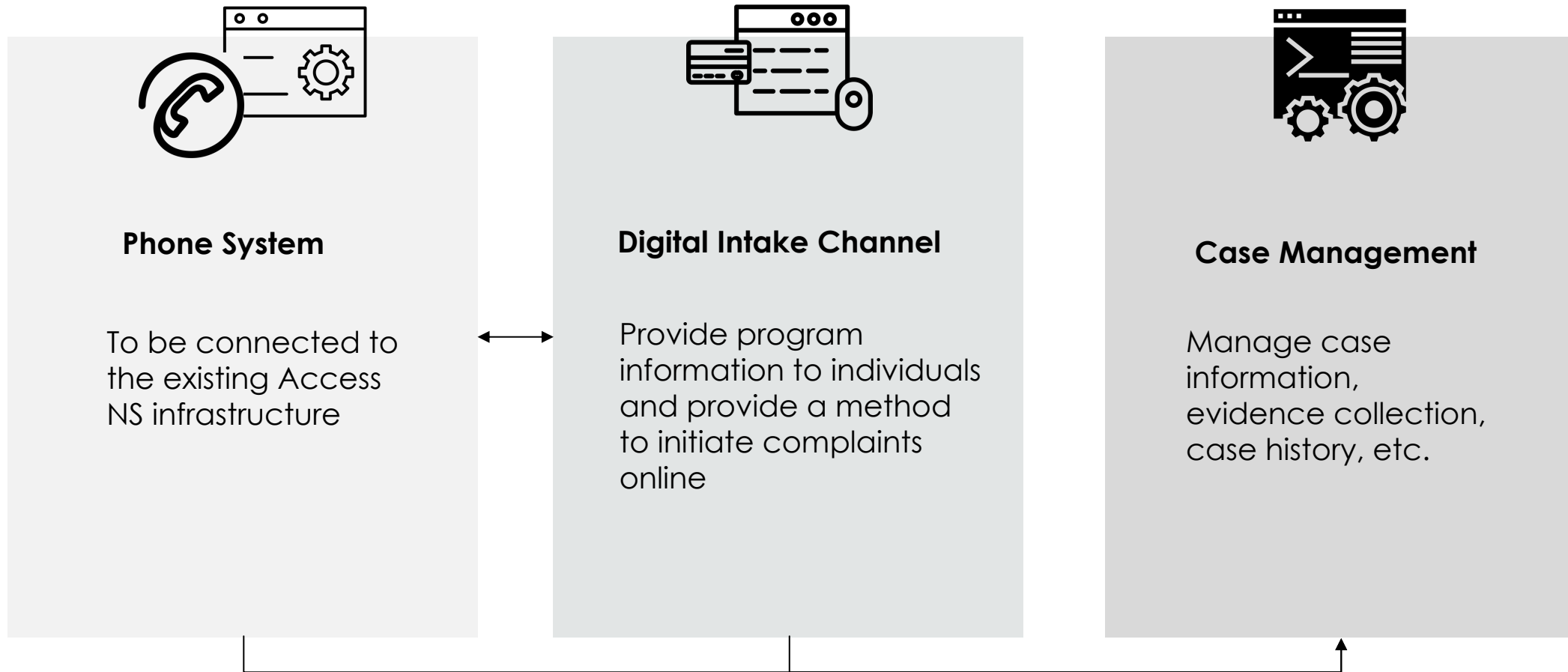
CEU Development Technology

COMPLIANCE AND ENFORCEMENT UNIT PLAYBOOK



Required technology

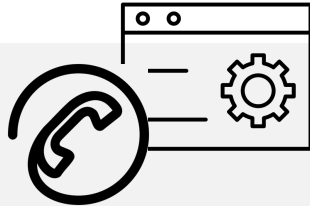
There are three key technology components required for the implementation of the CEU:



Business needs

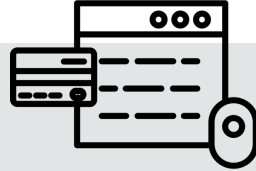
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The following business needs have been identified for each technology component:



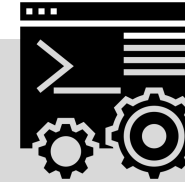
Phone System

- Allow individuals to speak to someone on the phone about their situation
- Allow individuals to initiate a complaint to the RTP or CEU over the phone



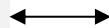
Digital Intake Channel

- Provide information about the RTA and the process to resolve a dispute
- Allow individuals to initiate a complaint online



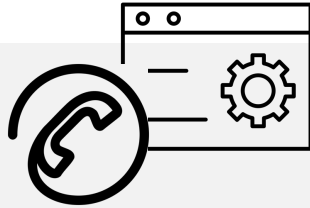
Case Management

- Enable efficient management and tracking of CEU cases
- Provide a centralized location to upload and store evidence, notes, and other relevant case documents that can be viewed by all CEU staff
- Report on various business KPIs to inform success of the unit and potential process improvements



Phone system key requirements

The following key requirements have been identified for each technology component



Phone System

Software – which controls the operation of the telephone system which includes call routing, voicemail, and other features

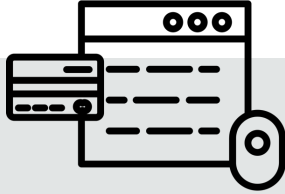
Hardware – includes Physical phones, phone lines and any other equipment needed to connect to the network

Support and maintenance – an ongoing maintenance and support is required to ensure that the system operate efficiently

User training – Access NS Contact Centre will require training on how to use the phone system effectively and efficiently e.g., *how RT related calls could flow through the contact center to Tier 2 call Centre*

Digital intake channel key requirements

The following key requirements have been identified for each technology component



Digital Intake Channel

Accessibility – the channel should be easy to use, user-friendly, responsive, and available 24/7 to users to access the website at any time

Security – the channel should be secure and protect users' personal information e.g., meet the province's privacy and security standards (Privacy Impact Assessment, Threat Risk Assessment, etc.)

Integration – the channel should integrate with case management system(s) to provide a seamless experience for users. E.g., TIMS and/or the replacement system

Case management key requirements

The following key requirements have been identified for each technology component



Case Management

Workflow Automation – the system should be able to automate workflows and processes, such as task assignment, status updates, and notifications.

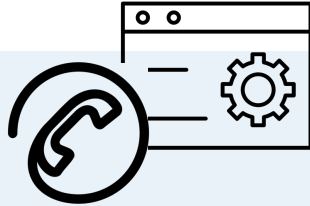
Device Responsiveness – The digital tool must support functionality across desktop, laptops, tablets, and smart phones

Tracking – The system should be able to track cases from start to finish with the case ID, including capturing case details, timelines, and performance management reports

Integration – The system should be able to integrate with other systems and platforms, such as document management systems, email systems, and calendars. *E.g. (TIMS and/or or new case management system)*

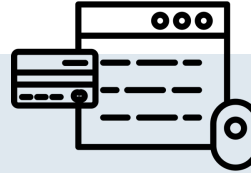
Possible solutions

The following potential solutions have been identified for each technology component:



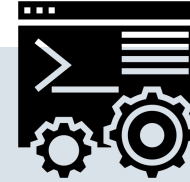
Phone System

1. Work with existing SNS-IS Contact Centre vendor to add additional functionality and create a Residential Tenancy Tier 2 call centre
2. Procure separate phone system software and integrate with existing SNS-IS Contact Centre
3. Procure separate phone system software and implement separate from SNS-IS Contact Centre



Digital Intake Channel

1. Increase scope of previously requested update to the RTP digital channel to include CEU requirements
2. Procure outside vendor to design and develop intake channel (and remove the intake need from the existing technology request)
3. Update existing NS Online form to fit the minimum needs of the CEU – may require manual effort to re-key information



Case Management

1. Increase scope of previously requested TIMS replacement to become the case management system for the RTP and CEU
2. Custom build a separate case management system for the CEU – potentially leveraging components from existing systems within other government areas
3. Procure software from outside vendor (e.g., Cross-Fire)

Key considerations

The following considerations have been identified for each technology component:

<p>Phone System</p>	<p>Integration with SNS-IS Contact Centre</p>	<p>Impact on workload of Call Centre agents</p>		
<p>Digital Intake Channel</p>	<p>Current NS Online tool for RTP is dated and being replaced</p>	<p>Opportunity to combine efforts with existing request to update RTP intake channel</p>	<p>May require an interim update to the current NS Online tool if the new intake channel is not ready in time for CEU launch</p>	<p>Long-term digital intake channel must integrate with case management system(s) for RTP and CEU</p>
<p>Case Management</p>	<p>Case management system must be able to integrate with the digital intake channel</p>	<p>Integration with TIMS, prior to it being replaced, may be redundant and manual efforts may be required at first</p>	<p>Explore the feasibility of merging the need for new CEU system with the replacement system for RTP</p>	<p>If CEU case management system is separate from RTP's, integration between two systems will be necessary</p>

Design process

Each technology component will need to follow a similar four-phased design process:

1 Discovery	2 Alpha	3 Beta	4 Live
<ul style="list-style-type: none"> • Business needs user research (e.g., process, volume, upload portal, reporting/data management, training, IT support, etc.) • Establish standards around: <ul style="list-style-type: none"> • log-in and/or authentication • UI/UX requirements • technical standards for system integration 	<p>Quick prototypes, testing and iterations of interfaces and experiences (UI & UX)</p> <ul style="list-style-type: none"> • Understand the needs/purpose of the solution and develop content strategy • Conduct end-user usability tests and make improvements • Privacy Impact Assessment (PIA) and Threat Risk Assessment (TRA) 	<ul style="list-style-type: none"> • Developing, testing and iterating the functional solution • Roll-out strategy • Internal user training 	<ul style="list-style-type: none"> • Maintenance & monitoring • Ongoing improvements (research, testing, iterating)

Required resources

The following resources will be required to design, develop, and implement the required technology:

Roles	Responsibilities
Delivery Manager / Agile Team Lead	Facilitates the Agile development process within the team and ensures that the team is working effectively and efficiently.
User Researcher	Understands and identifies the needs, behaviours, and attitude of users to inform the design and development of a product.
Technology Lead	Oversees the technological development and innovation within an organization and ensures technology projects are completed on time and within budget.
Development engineer	Responsible for designing, building, and maintaining software systems by ensuring that developed software meets business requirements.
Quality Assurance Analyst	Ensures that the product and service provided by meets the standards of quality expected by the organization.

Required resources cont'd

The following resources will be required to design, develop, and implement the required technology:

Roles	Responsibilities
Service Designer	Responsible for designing and improving services and meets the needs and expectations of the organization.
Privacy Analyst	Responsible for assessing, evaluating, and managing the privacy risks and compliance requirements.
Testing Lead	Responsible to oversee and manage the testing process for a software development project and ensuring that the testing activities are planned and executed.
Content Designer	Responsible for creating and shaping the content that appears on the websites, mobile apps, and other digital platforms. Ensuring that the content is clear, concise, engaging, and user-friendly.
Change Manager	Responsible for planning, implementing and managing changes within the organization. Ensuring that changes are communicated effectively within the organization.




CEU Development Budget

COMPLIANCE AND ENFORCEMENT UNIT PLAYBOOK



Budget overview

The following slides outline in detail the estimated costs associated with:

-  **Staffing**
-  **Operating Expenses**
-  **Implementation**

These details have been assembled in the Financial Implications slide to outline the budgetary requests for 2023/24, 2024/25 and ongoing.

Staffing cost estimates

The table below outlines the staffing cost estimates based on the recommended job classifications.

	Preferred Option
CEU Manager	<ul style="list-style-type: none"> • 1 FTE • Classification: EC12 (\$99,345 - \$136,601) • Cost: \$136,601
CEU Supervisor	<ul style="list-style-type: none"> • 1 FTE • Classification: TE26 (\$78,597 - \$91,828) • Cost: \$91,828
Information Officers	<ul style="list-style-type: none"> • 4 FTEs • Classification: PR10 (\$69,075 - \$84,268) • Cost: \$337,072
Investigation Officers	<ul style="list-style-type: none"> • 4 FTEs • Classification: TE24 (\$72,350 - \$85,213) • Cost: \$340,852
Total Annual Staffing Costs	\$906,353

These estimates will need to be updated once the job classifications have been confirmed.

Includes 18% additional cost for benefits

Operating cost estimates

The table below outlines the operating cost estimates for the CEU

	Low	High
Office space, travel, equipment, etc	<ul style="list-style-type: none"> • 10 FTEs x \$7,000 • Cost: \$70,000 	<ul style="list-style-type: none"> • 10 FTEs x \$7,000 • Cost: \$70,000
Additional Investigator Travel	<ul style="list-style-type: none"> • 4 FTEs x \$2,500 • Cost: \$10,000 	<ul style="list-style-type: none"> • 4 FTEs x \$5,000 • Cost: \$20,000
Ongoing Training	<ul style="list-style-type: none"> • 10 FTEs x \$2,000 • Cost: \$20,000 	<ul style="list-style-type: none"> • 10 FTEs x \$2,500 • Cost: \$25,000
Technology (ongoing) Licenses, support, upgrades	<ul style="list-style-type: none"> • \$50,000 	<ul style="list-style-type: none"> • \$65,000
External Communications	<ul style="list-style-type: none"> • \$10,000 	<ul style="list-style-type: none"> • \$10,000
Miscellaneous	<ul style="list-style-type: none"> • \$10,000 	<ul style="list-style-type: none"> • \$10,000
Total Annual Operating Costs	\$170,000	\$200,000

Implementation cost estimates

The table below outlines the implementation cost estimates for the CEU

	Low	High
Project Management, Design & Analysis	• \$300,000	• \$350,000
Change Management & Communications	• \$100,000	• \$150,000
Training (onboarding)	• \$100,000	• \$150,000
Evaluation	• \$75,000	• \$100,000
Technology (set up) Phone, Case Mgmt, Digital Intake	• \$500,000	• \$1,500,000
Total Implementation Costs	\$1,075,000	\$2,250,000

*Technology costs are greatly impacted by the selected case management solution

Total financial implications

The following table itemizes the financial implications on an annual basis, including the elevated costs in year one to lead a successful implementation.

	2023/24	2024/25	ONGOING
Staffing	\$491k	\$997k	\$1.10M + 10% annual growth
Operations	\$115k - \$135k	\$185k - \$220k	\$205k - \$240k + 10% annual growth
Implementation	\$715k - \$1.5M	\$360k - \$750k	\$0
Contingency (10%)	\$130k - \$210k	\$155k - \$195k	\$130k - \$135k
TOTAL	\$1.5M - \$2.3M	\$1.7M - \$2.2M	\$1.5M

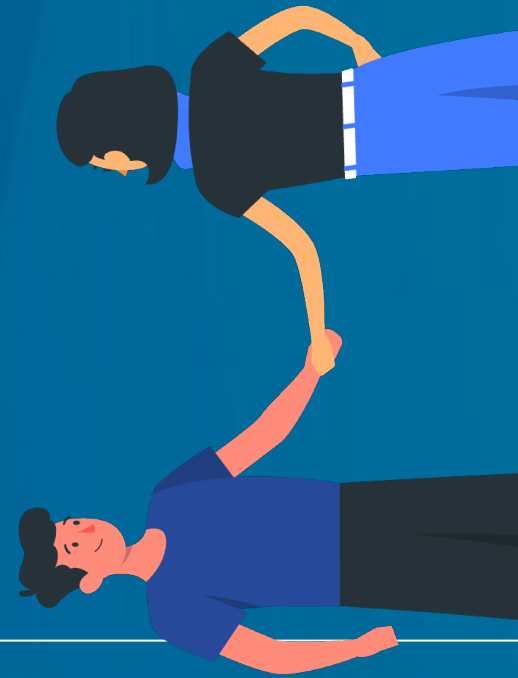
Note:

- 2023/24 includes 8 months of implementation, operating expenses and Manager & Supervisor expenses, with 6 months of the remaining staff expenses
- 2024/25 includes 4 months of implementation and 12 months of staff and operating expenses
- 10% annual growth was selected to recognize that the rental market in Canada is currently growing at 20% per year, but efficiencies will also be gained through experience operating the CEU.

CEU Development

Future Engagement and Partnerships

COMPLIANCE AND ENFORCEMENT UNIT PLAYBOOK



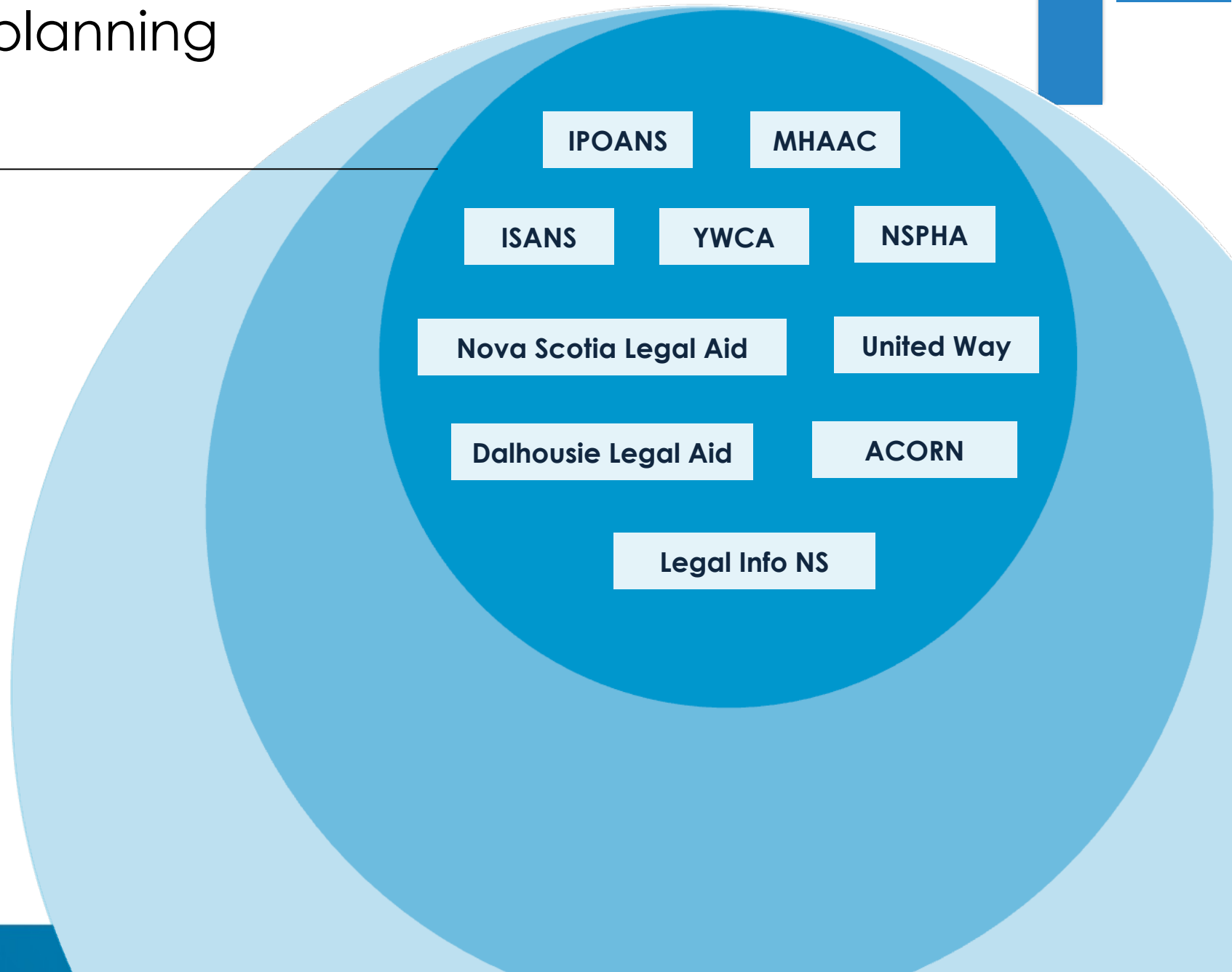
Future engagement planning

- As the CEU is being developed, there is time to plan for additional engagement with interest groups, key community players and organizations that are linked to CEU operations.
- Future engagement could inform parties about previous engagement activities that informed government decision-making, the Government's direction and decision, and the path forward for CEU development.
- Future engagement can keep the Government informed about expectations of the parties and the public as the CEU is implemented and what other events could shape the context for the implementation and those it impacts.
- Future engagement can prepare all parties for upcoming legislation changes and provide the project team with insight about the process and potential public outcomes and expectations, particularly Law Amendments where the public can speak to any Bill under consideration by the Government.

Future engagement planning

Interested Parties

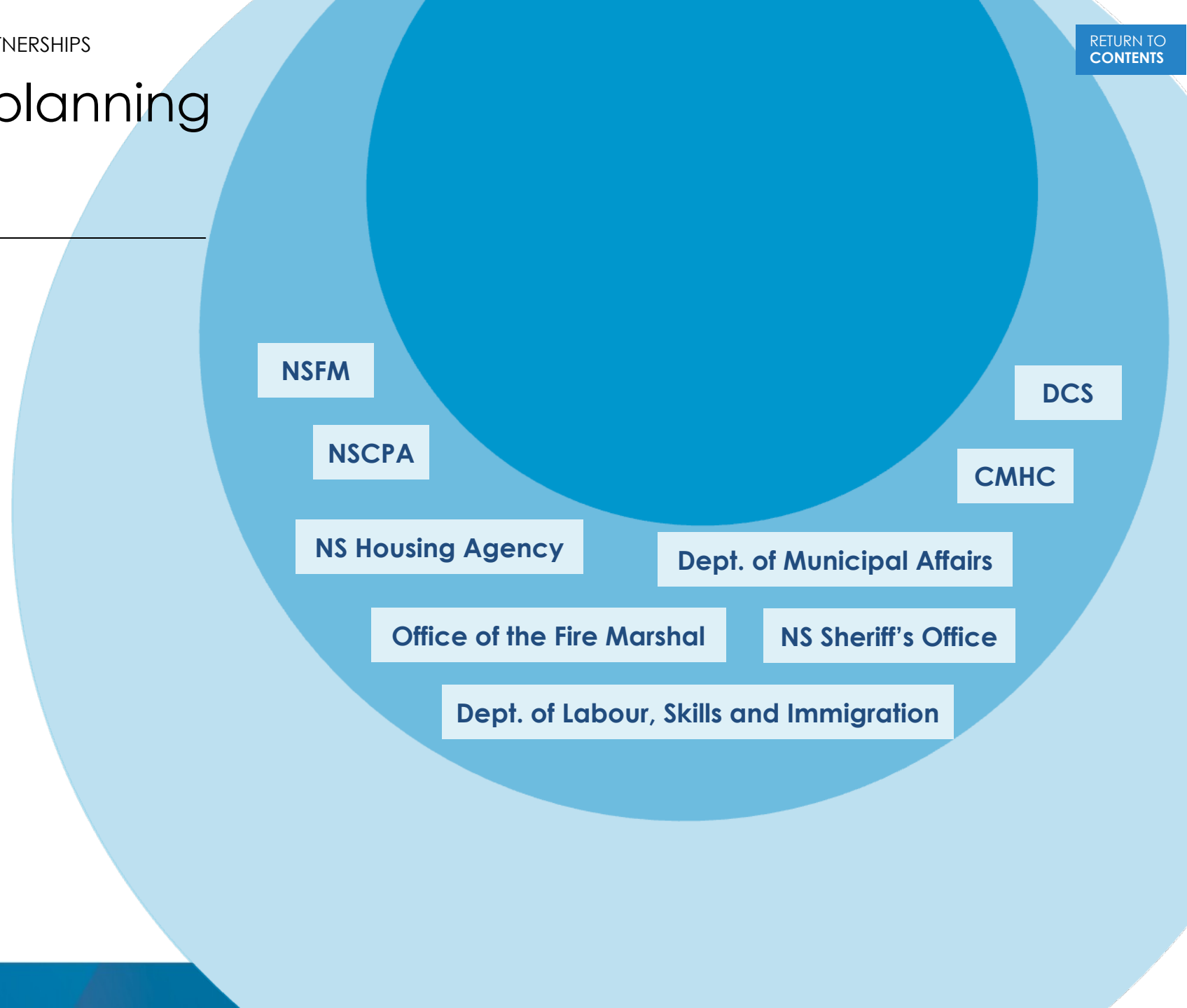
- Plan and hold engagement with Interested Parties for collaboration on "egregious" offences and case studies to be used in policy development
- Prepare update for Interested Parties for next bi-annual meeting, post MEC about government direction
- Schedule meeting and update Interested Parties



Future engagement planning

Impacted/Impacting Parties

- Review roles and handoff protocols with Municipal Affairs and Housing, and Municipal Building Inspectors
- Review roles and handoff protocols with Fire Marshall's office
- Explore feasibility and potential for role review and handoff protocols with applicable law enforcement bodies.



Future engagement planning

Targeted or Public Engagement

- Develop generic presentation package for engagement with community groups, interested parties about the creation and operations of the CEU
- Explore potential for public engagement in advance of legislation changes

Tenants

Landlords

Potential CEU partnership development

CEU partnerships could be developed with organizations that share similar goals and practices or could support the CEU in advancing their own goals, practices and/or operations.

Partner	Opportunity
Nova Scotia Public Prosecutions	Develop an MOU to secure services of public prosecutions for enforcement cases which are prosecuted and for advice on the viability of potential cases.
SNS-IS: Alcohol & Gaming Division	Partner on similar practices and training such as field visit protocols, OH&S practices, de-escalation training, customer service and diversity, equity and inclusion training.
Nova Scotia Department of Finance	This Department possesses the powers and mechanisms to collect penalties on behalf of the CEU and will be the recipients of the penalty proceeds.
Utilities and Vital Services Providers (in collaboration with Fire Marshall)	Establish a working relationship with these providers such as Bell, Eastlink, Nova Scotia Power, Eastward Energy, municipal utilities, etc. Provide information on the establishment of the CEU and contact information for questions or issues.
SNS-IS: Contact Centre	Partnership to establish an Information Officer unit within the contact centre. The Contact Centre has expressed interest in initial discussions.

Prosecutions partnership

Initial engagements were completed with the Public Prosecution Service to explore the opportunity for a dedicated Crown Attorney for the CEU. Similar partnerships currently exist between the Special Prosecution Service (SPS), Occupational Health and Safety, and Environment.

SPS Crown Attorneys:

- Provide consultation and advice on potential cases when needed (generally, in more complex cases)
- Prosecute cases after charges are laid
- Provide ad-hoc and annual training to investigators on the legislation and use of powers. Similar training could also be provided to Information Officers.
- Submit annual reports as part of the Memorandum of Understanding
- Provide advice on developing forms that will be used to collect information for cases

SPS has indicated that recruitment, training and hiring for a Prosecutor should require less than 3 months.

Item	Cost
Operational Ongoing (*incl. salary and benefits)	
Crown Attorney 5 (4 years' experience)	\$122,064.31*
Legal Assistant (CL21 (3))	\$62,151.03*
Paralegal (TE 21 (3))	\$68,782.62*
Barristers' Society Fees and Insurance	\$2,830
Total Annual Cost	\$255,827.96
One-Time	
Legal Support Office/Computer	\$7,000
Crown Attorney Office/Computer	\$10,000
Total One-Time Costs	\$17,000

CEU Development Communications Planning

COMPLIANCE AND ENFORCEMENT UNIT PLAYBOOK



Internal communications planning

Communications can be leveraged to support employees through periods of transition by providing needed clarity, direction, and the statement of benefits achieved through the proposed change.

Approach

- Leverage existing communications channels to SNS staff
- Provide timely updates to create awareness of key decisions and milestones within SNS
- Provide contact for additional information or support to staff

Mechanisms

- Emails
- Key messages for team meetings
- Briefings to staff and management/senior management
- Other existing channels

Internal communications planning cont'd

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Proposed topics for internal communications



Government direction & decisions made

- Timeframes
- Key milestones, including launch communications



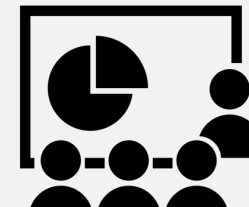
Internal support contacts i.e., program, policy & IT



Provide benefits, necessary information, FAQs, etc.



Additional information should be provided for any impacted staff



Training requirements and opportunities

External communications planning

Similar to internal communications, external communications can also be leveraged to support clients/users and the public through periods of transition by providing needed clarity, direction, and the statement of benefits achieved through the proposed change.

External communications should be delivered in a consistent manner with all NS Government communications which are focused externally.

Approach

- Plain-language communications
- Online availability of information
- DEI lens, behaviourally-informed

Mechanisms

- Government of Nova Scotia media releases, statements
- Residential Tenancies website updates
- Potential marketing avenues such as social media advertising, etc.

External communications planning cont'd

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Proposed topics for internal communications



Government direction & decisions made

- Timeframes
- Key milestones
- Service launch



Residential Tenancies (RTP & CEU) Service Details

- Roles & Responsibilities for LL and TT (may need updates from current)
- Who do you contact?
- Which stream fits with the complaint?
- Urgency/Triage/Priority and estimated timeframes
- Decisions & outcomes
- Penalties
- Repeated offenders published
- What is expected of each party during the CEU or RTP process
- Offences
- How to talk to/approach other party, supportive materials to encourage early resolution