EVALUATION OF PARKS CANADA’S PUBLIC SAFETY PROGRAM

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Performance, Audit and Review Group
Parks Canada Agency
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EXECUTIVE SUMMARY

Parks Canada’s Public Safety Program aims to minimize the number and severity of public safety incidents at national parks and national historic sites and, fulfilling Parks Canada federal role in support of the National Search and Rescue Program. Parks Canada employs a risk-based approach to public safety programming and services provision, managed at the Field Unit level through Public Safety Plans. The Public Safety Program objectives are achieved through provision of prevention and search and rescue services in cooperation with other federal departments and agencies, other levels of government and non-governmental organizations.

The Evaluation was carried out by the Performance, Audit and Review Group of Parks Canada based on document review, interviews with public safety staff and management across the Agency and a written survey of all field units. A number of sites visits were also carried out. The evaluation examined the effectiveness of the Program Policy Framework in providing overall program direction and guidance, and how well the program is administered in delivering public safety services at national parks and national historic sites and canals.

The Evaluation findings indicate that the Program policy framework needs to be revised and updated to clearly define the roles and responsibilities of the field units, the Service Centres and the National Office. The Evaluation also found that a number of field units either do not have a Public Safety Plan in place or, have not updated their Plan in several years. The Evaluation concludes that improvements are needed in a number of areas including development of national approaches to setting minimum training standards, defining service levels, and providing a more systematic approach to prevention activities. Finally, the report highlights the need for better incident tracking data necessary for national reporting on the Program’s performance, and a more scientific approach to prevention.

As a result of the review it is recommended that Parks Canada:

- It is recommended that the Public Safety Policy Framework be reviewed, updated and re-issued to provide clear direction and guidance on the different elements of Parks Canada’s Public Safety Program.

- It is recommended that Parks Canada review and define the roles and responsibilities of the field units, the Service Centres and the National Office in a new Program Policy Framework. Further, it is recommended that roles and responsibilities of the Service Centres and the National Office vis-à-vis assisting field units in following the due diligence process in the administration of their public safety programs, be strengthened.

- It is recommended that all field units be required to have an approved public safety plan that is based on a risk assessment of potential hazards to public safety within the parks and sites.
Further, field units should be required to update their safety plan on a regular basis as outlined in the Program Policy Framework.

- It is recommended that the National Office provide, in a new Public Safety Program Management Directive, clear guidelines for developing basic public safety training standards. The directive should clarify the role of Service Centres in assisting field units with the development and implementation of training standards. It is further recommended that there be ongoing monitoring by the Program to ensure that training standards are applied consistently across the Agency.

- It is recommended that, following a risk assessment process, field units identify service levels in their public safety plans, ensure they have the capability to meet them, and communicate services levels to their visitors. It is further recommended that the National Office define a national approach, and the Services Centre assist in the planning and evaluation of the public safety plans.

- It is recommended that field units undertake prevention activity planning as part of regular updating and redrafting of their public safety plans. Prevention planning should follow a risk-assessment process, and be based on an analysis of public safety data. It is also recommended that field units, Service Centres and the National Office work collaboratively on a strategic approach to prevention programming nationally, and measurement of program outcomes.

- It is recommended that the Occurrence Tracking System be fully implemented and adopted by all field units. Further, necessary standards be developed to ensure that consistent national public safety incident data is collected. It is recommended that field units put in place the necessary arrangements with other federal departments and agencies, and other jurisdictions to acquire public safety data in protected heritage areas.
1.0 INTRODUCTION

The Audit and Evaluation Plan of Parks Canada identified the Agency’s Public Safety Program a priority area for evaluation in 2003-2004. The purpose of the Evaluation was to assess the effectiveness of the Program Policy Framework in providing overall program direction and guidance, and how well the program is administered in delivering public safety services at national parks and national historic sites and canals, and identify areas for improvement. In other words, the Evaluation’s aim was to examine the program activities and outputs, and making recommendations for their improvements.

It is important to note that this Evaluation did not assess the Program’s outcome of reduction in the number and severity of incidents. Nor did the Evaluation address issues of “relevance” and “cost-effectiveness” as they were not deemed to be pertinent at this time.

2.0 EVALUATION SCOPE AND METHODOLOGY

The scope and methodology for this Evaluation were based on the Evaluation Framework of the Program that was prepared in 2002 as a planning document for this Evaluation. A Steering Committee of field unit superintendents and Public Safety Specialists was established to define the scope of the study and guide the work of this Evaluation. The Steering Committee identified a number of evaluation issues as priority areas for evaluation. The Committee also identified a sample of national parks and national historic sites and canals where the Evaluation issues would be examined.

The sample sites were selected to provide national coverage of the organization and represent terrestrial, mountain, and marine environments, with backcountry, day use, and urban activities and settings. The last criterion for determining the sample was to include sites with varying rates of public safety incidents and severity. The following sites were visited for this Evaluation: Gros Morne National Park, St. Lawrence Islands National Park, Prince Albert National Park, Banff National Park, Auyuittuq National Park and Mount Revelstoke / Glacier National Parks, Saguenay-St. Lawrence Marine Park, Forth Rodd Hill National Historic Site, Chambly Canal, Trent Severn Waterway, the Lake Louise-Yoho-Kootenay Field Unit and the Atlantic Service Centre.

The data collection methods for the Evaluation consisted of program file and document review, 35 in-person and telephone interviews with public safety staff and management across the Agency, a written survey of all field units, and site inspections. The Evaluators used qualitative methods for analyzing document review, interview, and survey data in examining the evaluation issues.
3.0 PARKS CANADA’S PUBLIC SAFETY PROGRAM

Public Safety in the context of Parks Canada’s program is defined as “a coordinated effort to ensure that visitors to national parks, national historic sites, national marine conservation areas and canals have a positive experience while minimizing the potential for suffering or loss. Public safety deals with the measures employed to reduce the risk of an incident occurring or to protect visitors from a hazard; and measures to be implemented in the event that an incident develops requiring emergency response capabilities.”

The objectives of the Public Safety Program are:

1) To minimize the number and severity of incidents.
2) To fulfill Parks Canada’s federal role in support of the National Search and Rescue Program.

The mandate for public safety is established in the National Parks Act and the Canada National Marine Conservation Areas Act. Furthermore, Interim Bulletin 4.4.3 states that Parks Canada will provide land and marine search and rescue services in the national parks to minimize the number of fatalities and the extent of injuries and human suffering of people who are lost and/or in distress. It also gives the overall roles and responsibilities for public safety in national parks to the Superintendent of each park. Public Safety Directive Bulletin 3.1.3 (December 1991) requires that all historic sites develop and implement risk management programs for the safety of visitors. Directive 2.2.4 - Emergency Services (1991) addresses contingency or response planning for all types of natural or human caused emergencies at a site.

In addition, in the event of legal action against Parks Canada in the context of its public safety services, the Crown Liability Act governs such legal actions against the federal government in Canada. The Crown Liability Act states that a private person may hold federal departments and agencies legally liable for damages resulting from negligence in the provision of program services.

Given public safety staff’s needs for training in such skills as wilderness travel, survival skills in all park environments, etc., Parks Canada is required under the Canada Labour Code and under Canada Occupational Safety and Health Regulations, to meet certain safety standards for public safety employees to successfully carry out their responsibilities.

3.1 PUBLIC SAFETY PROGRAM PERFORMANCE FRAMEWORK

The Program performance framework (Table 1) shows the chain of program results reflected in
the design of Public Safety Program activities and their intended outcomes and impacts. It is important to note “the term search and rescue is generically used to describe the response to any incident which involves one or all of locating (i.e. searching), reaching, stabilizing (i.e. administering first aid) and evacuating the victim to safety or to a medical facility”\(^2\).

\(^2\) Public Safety Management Interim Bulletin 4.4.3, August 1998, Parks Canada
## PUBLIC SAFETY PROGRAM PERFORMANCE FRAMEWORK

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3.1.1 Program Resources and Inputs

The Public Safety program resources are allocated at three levels: the National Office, Service Centres, the Field Units and sites. The National Office resources are dedicated to coordination, planning, and implementation of Public Safety program activities nationally. There are limited resources at the Service Centres (with the exception of the Western Canada Service Centre) to assist sites in the planning, coordination and review of public safety programs. Field Units and sites are charged with the planning and delivery of on-site public safety services.

Parks Canada resources expended on public safety are estimated through a breakdown of staff’s time and the use of capital assets. In some parks (e.g. Mountain Parks) there are employees who are assigned solely to public safety duties, while at other sites, staff in addition to public safety duties, are also responsible for law enforcement and conservation. In terms of assets, for example, a vehicle may be used for a number of operations including search and rescue activities. For unforeseen and extraordinary expenditure related to public safety such as a search and rescue response lasting several days, field units may access funding under Vote 120 from the National Office.

The Program also may receive funding from the National Search and Rescue Secretariat’s New Initiatives Fund (NIF) if its funding application is approved. The Fund provides support for successful new and innovative proposals that will enhance search and rescue in Canada.

Currently, there is no reliable information on how much resources are allocated to the Public Safety Program at Parks Canada.

3.1.2 Program Activities and Outputs

Public Safety Activities at National Office

The National Office has the responsibility for designing and implementing policies and programs for the assessment, management and monitoring of risks to visitors and liability associated with PHAs and their recreational activities, services and facilities. The National Office also manages projects funded by the SAR New Initiative Fund. Other duties include designing and delivering technical and operational training to various levels of Parks Canada staff involved in the Public Safety program, and visitor risk management at the national level. National Office staff participates in the Inter-departmental Committee on Search and Rescue (ISCAR) and its sub-committees.3 ICSAR provides advice on SAR matters to the Minister of Defence who is the lead

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3 The Inter-departmental Committee on Search and Rescue (ISCAR) is a federal body comprising the federal SAR delivery departments and agencies: Environment Canada (Meteorological Services of Canada, Department of Fisheries and Oceans (Canadian Coast Guard), Department of National Defence (Canadian Forces), Parks Canada Agency, Solicitor General of Canada (Royal Canadian Mounted Police), and Transport Canada, and is chaired by the Executive Director of the National SAR Secretariat).
Minister for search and rescue. As a member of the ICSAR, Parks Canada works to promote coordination and joint operations where needed among federal SAR programs. Annually, there are two ICSAR meetings and four sub-committee meetings. Parks Canada also plays a role in the review and reporting of Federal SAR Program policies and plans as all ICSAR members share collective responsibilities in this regard.

Finally, the National Office is responsible for horizontal coordination of issues and activities, and national level tracking, collection, measurement and reporting of data.

Public Safety Activities at Service Centres

Service Centres (with the exception of the Western Canada Service Centre) provide sites with assistance in the planning, coordination and review of public safety plans and services. Currently, there is limited capacity at the Service Centres to work with field staff to ensure consistency in the development of public safety plans, visitor risk management and issues such as levels of service.

Public Safety Activities at Field Units

All field units provide a basic level of public safety. The scope and the range of services provided may vary significantly from each park and site to the others depending on their geographical location, recreational activities offered, season, etc. Overall, field units’ public safety activities may be divided into four categories: planning, prevention, search and rescue, and emergency services.

Field Unit Superintendents retain overall responsibility for Public Safety at the field unit. The Superintendent is responsible for providing training and equipment required to provide the appropriate level of public safety services as outlined in the public safety plan and establishing cooperative arrangements, with other regions and agencies, where assistance is needed to obtain supplementary search and rescue services.

In national parks, the Resource Conservation Manager is responsible for delivering public safety as part of the larger Heritage Resource Conservation activity. The Resource Conservation Manager may assign one park warden the role of managing a team of public safety specialists, and the responsibility for coordinating and delivering SAR - VRM services. At national historic sites and canals, the responsibility for public safety rests with site Superintendents who normally delegate this task to their staff.

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4 Public safety expertise in the Western region is concentrated at the site level.
Public Safety Plans

Each field unit is responsible for developing a Public Safety Plan including an assessment of risks to visitors and the public, potential public safety issues, levels of service and implementation timelines and costs. Sites develop their Public Safety Plans using the Visitor Risk Management process (VRM). The VRM Handbook\(^5\) provides a detailed process for identifying and assessing visitor related risks at national parks, national historic site and canals, and producing a Public Safety Plan. Public Safety Plans also address legal, policy, contractual obligations, and disaster emergency response planning.

Prevention

Prevention is a key element in public safety. The Bulletins 4.4.3 and Management Directive 3.1.3 place high priority on providing comprehensive prevention programs to minimize the potential for occurrences. The bulletin and directive state that Parks Canada will provide visitors with the information they need to protect themselves, including advice and warnings regarding potential hazards to visitor safety.

Field units undertake a range of activities to educate visitors on and raise their awareness of potential risks that exist within a site. Education and awareness play a crucial role in the success of Parks Canada’s “Safety is a Shared Responsibility” approach, which urges visitors to be informed about the site they plan to visit and learn about its hazards. Examples of education and awareness activities are: weather advisories, avalanche bulletins, detailed pamphlets on hiking trails and potential hazards, safety information sessions for parks visitors on specific activities and associated risks.

Prevention also includes reducing risk to visitors through hazard mitigation measures such as trails or facilities closures, initiating avalanches under controlled circumstances to reduce the avalanche threat to roadways, relocation of problem animals, installing barriers and fences to mitigate risk of falling, and providing safety registration services.

Search and Rescue

As defined earlier, the term search and rescue refers broadly to the response to public safety incidents, which vary a great deal in severity and response requirements. Search and rescue consists of SAR readiness and capability to respond, and SAR response.

For effective provision of SAR services, the program ensures that public safety staff have the

\(^5\) Parks Canada produced the Visitor Risk Management Handbook in September 1996 to provide field staff with guidance on how to conduct a risk assessment process, prepare a public safety plan and produce an ongoing management framework for their public safety plans.
necessary training and equipment to respond to incidents. Field unit staff conduct search and rescue response capability assessments to identify what training and equipment are needed to provide the levels of service identified in their Public Safety Plans. Public safety staff need to undergo a range of training programs in order to be able to respond safely and effectively to incidents. For occupational health and safety purposes, staff involved in public safety need training in first aid at all levels, wilderness travel and survival skills up to intermediate level in all park environments, and training in toxic material management, initial response and containment. Public safety staff also receive training specific to the SAR response and levels of service requirements of their sites. For example, in a marine environment, SAR staff need water rescue skills while in a mountain park, training would involve high angle rope rescue and other climbing skills. The field unit according to their needs generally identifies training and equipment standards. However, this means that generally there are no national standards for public safety training and equipment. The Public Safety Program also conducts readiness exercises relating to different aspects of SAR, for example, helicopter sling rescue services program (pilot testing, research and development, etc.).

Public safety staff respond to calls for assistance for injured, sick, stranded or lost visitors. Requests for SAR could be for overdue persons, avalanche or crevasse fall victims, assistance to other agencies, etc. SAR response is provided in road accessible as well as all other park environments where technical rescue such as helicopter sling and search dog operations may be required. The program also provides water rescue operations at sites such as Fathom Five National Marine Park and Gwaii Haanas National Marine Conservation Area Reserve.

In the past, field units used two database systems (BRAL and MILE Plus) for tracking public safety performance information. These systems collected fairly basic data on occurrences but did not have the capability for data analysis. Currently, the Agency is in the process of implementing a web-based “Occurrence Tracking System (OTS)” for recording public safety and other incident data. The new system is scheduled for full completion in the summer of 2005. Once populated with data from all field units, the OTS will facilitate national performance reporting on the Agency’s Public Safety Program.

### 3.2 PUBLIC SAFETY PROGRAM REACH

The beneficiaries and service users of the public safety program are primarily national park and national historic site visitors. Park residents and park businesses and their staff are also primary beneficiaries of public safety services.

The program in some field units tracks information in a number of areas including age, gender and origin of search and rescue victims, recreational activities and participation rates within the park, number of incidents in relation to month/season, location of incidents etc. This information is used in the visitor risk management process to better design and target safety programs to the appropriate visitor groups.
Other service users include guide service companies, other federal departments and agencies (e.g. RCMP, Canadian Coast Guard), provincial and municipal governments (e.g. provincial parks, provincial emergency programs, municipalities police forces). There are a number of government departments and agencies and non-government organizations that co-deliver public safety services and work toward the achievement of the program objectives. Examples of NGO co-delivery agents include: Canadian Avalanche Association, Canadian Ski Patrol System, and Canadian Recreational Canoeing Association.

### 3.3 PROGRAM RESULTS

As outlined in the performance framework, the program aims to achieve two overall long term outcomes: 1) it aims to reduce the number and severity of incidents in PHAs; and 2) to provide visitors with safer experiences at national parks and national historic sites. These program outcomes are reflected in some of Parks Canada’s corporate documents.

In working towards these long-term objectives, the program has identified a number of intended intermediate outcomes and impacts. The prevention component of the program seeks to reduce the number of incidents by promoting self-reliance and risk management in visitors and their activities. This result is achieved by increasing visitors’ awareness that safety is a shared responsibility when visiting protected heritage areas, and to undertake activities for which they have the necessary skills, equipment and experience.

Another key program result is effective search and rescue response. Effective response would ideally result in the prevention of death and reduction in victims’ injuries. Nonetheless, this is not always the case. Given all the variables (e.g. weather conditions, darkness, natural hazards such as risk of avalanche) that could impede SAR response, it is unrealistic to define the field unit’s SAR effectiveness only in terms of number of lives saved or reduced severity of injuries.

Client satisfaction with public safety services is also a key program result. A study analyzing a number of surveys of client satisfaction with the program (conducted from 1995 to 1998) concluded that satisfaction levels were high (over 80%) with many aspects of the program. The study report recommended improvements in the following public safety services areas: public awareness of public safety services, including first aid services; the level of safety information delivered across areas within a site; the provision of pre-trip information to visitors, both directly from the site, and in cooperation with others.  


The Public Safety Program works to reduce the Crown’s potential for liability through each site’s public safety activities for managing visitor risks and protection of the organization from possible legal claims.
Finally, the Parks Canada’s participation in the National Search and Rescue Secretariat’s activities aims to achieve a level of coordination and planning where it can provide SAR response effectively, when needed.

4.0 EVALUATION ISSUES, FINDINGS AND RECOMMENDATIONS

This section examines the Evaluation issues, and provides findings and recommendations that are based on the review and analysis of program files and documents, data generated through interviews of key informants and the survey of field units.

Issue 1: An adequate Public Safety Policy Framework is in place to provide the necessary guidance and direction for PS Program design and delivery.

Potential Risk:

- Policy framework may not address the current needs of the Program
- Lack of consistency in program planning and service delivery
- Potential inability to show due diligence

Findings

The policy framework for the Parks Canada’s Public Safety Program consists mostly of two documents: Interim Bulletin 4.4.3: Public Safety Management, issued in August 1998 for the National Parks, and the Management Directive 3.1.3: Public Safety Measures for National Historic Sites and Historic Canals, issued in December 1991. In addition to these two documents, there are a number of related guidance material such as the Visitor Risk Management Handbook.

The Management Directive 3.1.3 describes the program legislative authorities, roles and responsibilities, safety measures, training and inspection requirements. The underlying premise of the Directive is the fact that many of the NHSs are located in or close to urban areas where public safety services could easily be accessed from other organizations. The Directive, which is now about 14 years old, was issued several years before Parks Canada produced the Visitor Risk Management Handbook, requiring all field units to base their public safety plans on a risk assessment of potential hazards at the sites. The Directive does not reflect more recent approaches to public safety planning and the changes that have been effected in the program in last decade.

The Interim Bulletin 4.4.3 provides more detailed direction and guidance to field units on the provision of public safety services in national parks. In addition to covering the same areas as
Directive 3.1.3, the Interim Bulletin provides detailed procedures for developing public safety plans, prevention activities and conducting search and rescue.

The review of the Program documents, and interviews with program managers and staff, indicate that the Program Policy Framework is in need of review and update, and should be strengthened. Given the decentralized nature of Parks Canada’s organization, the focus of a renewed Framework should be on providing national and regional consistency and program cohesion among similar sites through clear standards for planning, training, and service levels for prevention and search and rescue, and reporting of data. The Policy should also give direction regarding the preparation of risk-based Public Safety Plans within a certain period of time after a national park or national historic site is created, with regular updates as specified by the policy or directive.

The 2003 Law Enforcement Management Directive 2.1.9 could serve as a model for the renewal of the public safety directives. The Law Directive has addressed some of the same program complexities around consistency and program cohesion that the Public Safety Program needs to improve on.

**Recommendation**

It is recommended that the Public Safety Policy Framework be reviewed, updated and re-issued to provide clear direction and guidance on the different elements of Parks Canada’s Public Safety Program.

**Issue 2: Roles and responsibilities of the Field Units, Service Centres and the National Office have been well defined.**

Potential Risk:

- Lack of well-defined roles and responsibilities could undermine program effectiveness, create duplication of effort or lead to important tasks not being addressed.

**Findings**

The Public Safety Management Directive 3.1.3 and the Bulletin 4.4.3 describe the roles and responsibilities of field unit staff and the National Office in the delivery of the public safety program. The Bulletin 4.4.3 also outlines the role of the Service Centres in public safety. As described in the Program profile, the overall responsibility for public safety in national parks and national historic sites rests with the Superintendent. Under the supervision of the Superintendent, Resource Conservation Managers have an overall responsibility to ensure all data collection, risk assessment, planning and operations are carried out. The Service Centre staff’s responsibilities consist of assisting the field units in the planning, coordination and review
of public safety programs through the provision of expert advice. The National Office is responsible for developing national prevention, visitor risk management, public safety and search and rescue policy, standards and planning guidelines, technical tools and performance indicators for the use of the field units.

The effectiveness of the public safety program is dependent on how well the field units, the Service Centres and the National Office carry out their assigned responsibilities. The Service Centres have been more involved in public safety in the East than in the West. Field units in the Atlantic provinces, Quebec and Ontario rely extensively on Service Centres for public safety expertise and advice. Service Centres provide advice on the preparation and revisions of public safety plans, conducting risk assessment of sites, training development and delivery. Most interviewees in the East believe that the Service Centres have been an important resource for the field units, and the discontinuation of this service will likely undermine the management and eventually the quality of their public safety programs. This is particularly true for smaller sites where there are fewer or no specialized public safety resources. The contribution of the Service Centres is evident in the administration of public safety programs in these field units, i.e. more consistency in planning, risk assessment, evaluation, etc.

In the West, public safety resources reside in the field units, and there is little or no interaction with the Service Centres in this regard. Since the elimination of the Public Safety Specialist position five years ago, the field units in the West rely on the Regional Public Safety Network to identify common issues, solutions and consistent approaches to problem solving. There are mixed views among those interviewed in the Mountain Parks with regard to the effectiveness of the Network in addressing horizontal issues and finding consensus on solutions. Some believe that the Network has not been an effective alternative to the role that a Service Centre Public Safety specialist would play.

Nationally, search and rescue specialists from the mountain parks are asked from time to time to assist the other field units in conducting search and rescue, training courses, and procuring equipment, adopting standards, etc.

Field units’ interaction with the National Office was described as mostly dealing with policy issues, and providing information. Generally, field units have had minor and infrequent dealings with the National Office.

The Evaluation found that there is a need and a potential for strengthening the roles and responsibilities of the Service Centres and the National Office in the implementation of the program nationally. Interviewees believe that National Office should provide the overall policy and guidance framework, setting consistent standards for basic training, prevention activities, planning and risk management processes. National Office could also be tasked with working on strategic planning issues, monitoring and reporting nationally on program performance and coordinating activities with other national agencies. Interviewees referred to the recent “Table Top Exercise” facilitated by the National Office in a number of field units (funding from the
National Search and Rescue Secretariat) as a good example of the National Office’s role and contribution to the program.

Service Centres’ roles on the other hand, should include coordination of policy delivery on a regional basis, identifying provincially required training, providing hands-on planning and risk assessment expertise, helping sites to evaluate their prevention and response activities and analyzing incident data for planning purposes.

There are good models within Parks Canada for the public safety program to emulate in building an effective national public safety network. As stated earlier, the Law Enforcement approach could serve as a model for detailing the roles and responsibilities of the field units, Service Centres and the National Office. Parks Canada’s Fire Management Committee and national network is another well-functioning multi-disciplinary example on which the Public Safety Program could be based.

**Recommendation**

It is recommended that Parks Canada review and clearly define the roles and responsibilities of the field units, the Service Centres and the National Office in a new Program Policy Framework. Further, it is recommended that roles and responsibilities of the Service Centres and the National Office vis à vis assisting field units in following the due diligence process in the administration of their public safety programs, be strengthened.

**Issue 3: Public Safety Plans and a risk assessment process implemented and updated in all field units**

Potential Risk:
- Lack of risk-based up-to-date plans may lead to ineffective and inefficient program delivery
- Lack of ability to demonstrate due diligence process resulting in legal liability

**Findings**

The Interim Bulletin 4.4.3 (National Parks) and the Management Directive 3.1.3 (National Historic Sites) state that parks and sites will develop a public safety plan which will outline public safety services to be delivered. The Interim Bulletin further states that parks will use the Visitor Risk Management (VRM) Handbook to carry out a risk assessment of the hazards at the park for planning and delivery of services. The plans are to be updated on a regular basis.

Interviews and the survey results indicate that a combination of 23 field units/sites have a Public Safety Plan in place, 13 do not. Several of the 23 safety plans in place have not been updated in last five years. Of the 13 field units/sites without a plan, some are in the process of development or completion. The survey asked field units to provide a copy of their Public Safety Plan. Of
those that responded, 15 provided a copy of their plan. An analysis of these plans showed that more recent plans (those developed within the last 5-6 years) are risk-based, and identify levels of service, prevention activities, and a multi-disciplinary approach to service delivery.

The interviewees and the survey respondents often allude to lack of resources, know how and other priorities as the reasons for not having a plan, or updating the existing one. They also believe, while the VRM Handbook is a thorough manual for carrying out a risk assessment exercise, it is too complex and cumbersome, especially for the smaller sites. Interviewees felt that they do not have the need or the resources to follow the VRM process for public safety planning. In order to assist field units, the National Office should streamline the VRM Handbook making it a more accessible tool, and provide planning expertise, either directly or through the Service Centres.

The evaluation concludes that lack of approved and updated public safety plans could undermine program effectiveness and the field units’ ability to fully demonstrate due diligence process. Public Safety Plans need to be reviewed at least every 2-3 years in order to update the visitor safety risk profile at the site. To date, in spite of the planning deficiencies, the public safety staff’s experience and intuitive understanding of visitor safety issues have been the primary reasons for Parks Canada meeting Public Safety Program objectives.

**Recommendation**

It is recommended that all field units be required to have an approved public safety plan that is based on a risk assessment of potential hazards to public safety within the parks and sites. Further, field units should be required to update their safety plan on a regular basis as outlined in the Program Policy Framework.

**Issue 4: National consistency in public safety basic training standards, including those pertaining to Occupational Health and Safety. Field units apply consistently the training standards they have adopted for their public safety programs**

Potential Risk:

- Inconsistency in basic training standards for service delivery
- Not meeting the Occupational Health and Safety requirements of the Canada Labour Code
- Inconsistent application of standards

**Findings**

The Interim Bulletin 4.4.3 (National Parks) states that the minimum standard of first aid for staff responsible for public safety will be based on the needs and level of services described in the Public Safety Plan. The Superintendent is responsible for ensuring that proper training is
provided and updated when needed. Management Directive 3.1.3 (National Historic Sites) states that the Superintendent is responsible for ensuring that all employees receive and maintain all necessary safety training. Staff will be given annual training which generally includes: first aid and rescue procedures to follow in the event of accidents or fire, care and use of safety devices, and an understanding of the Public Safety Plan.

Defining training standards for public safety staff, both for service delivery and for Occupational Health and Safety, is a complex task given the diversity of the program, and the specific training requirements in the Canada Labour Code. The Evaluation examined the level of national consistency in basic public safety training standards, including those pertaining to Occupational Health and Safety, and the extent to which field units have applied the training standards they have adopted for their public safety programs.

The interviews and program documents indicate that field units currently develop their own training standards according to the specific environment, the types of activities visitors participate in, and the number of visitors at their sites. For example, for high angle rescue, the mountain parks employ the standards of the Association of Canadian Mountain Guides, which includes leadership and equipment, and procedural standards. Informally, some field units learn and adopt from one another training and equipment standards where appropriate. For example, field units with marine environment choose standards locally (e.g. the Power Squadron) or, from those used at other marine parks.

At smaller parks and sites however, where public safety wardens multi-task and need to maintain training in a multitude of areas, application of training standards presents a challenge. Another issue is high staff turnover at some sites, which results in ongoing need for training, and puts pressure on scarce resources. Northern parks have their own unique challenges in applying training standards given the number of skill sets required for service delivery in the northern environment. The range of skills includes advanced arctic survival, skiing, mountaineering, snowmobile, and boat travel.

In terms of training standards for Occupational Health and Safety, individual field units assess staff duties in public safety delivery against the requirements of the Canada Labour Code, and determine what is required.

Generally, the Evaluation found little evidence of national coordination in defining training standards related to the program. There is a general lack of national guidelines or a framework for developing standards at the field unit level, which could result in similar parks and sites adopting different standards for such training as first aid courses. While this inconsistency of training standards does not necessarily undermine program effectiveness, it can however result in similar sites providing varying levels of service offer. Those interviewed believe that the National Office and the Service Centres should have stronger roles in setting and implementing national standards for public safety training requirements. A new Public Safety Program Directive on national training should provide the National Office with a clear role in defining
“tiered” standards and guidelines that correspond to staff’s duties and program involvement. This could be done similar to the approach taken in the Law Enforcement Directive. The Service Centres could assist field units in identifying provincial requirements and regional approaches for training, and options for meeting those requirements. Field units would continue to be responsible for assessing job hazards and resulting risk potential, and the required training for meeting Occupation Health and Safety requirements under the Canada Labour Code.

**Recommendation**

It is recommended that the National Office provide, in a new Public Safety Program Management Directive, clear guidelines for developing basic public safety training standards. The directive should clarify the role of Service Centres in assisting field units with the development and implementation of training standards. It is further recommended that there be ongoing monitoring by the Program to ensure that training standards are applied consistently across the Agency.

**Issue 5: Appropriate levels of service (LOS) for the Public Safety Program have been defined. The program has and will continue to have the necessary capability to deliver the stated LOS**

**Potential Risk:**

- Lack of appropriate levels of service and capability could potentially compromise of visitor safety
- Inability to demonstrate due diligence process

**Findings**

The Bulletin 4.4.3 defines Level of Service (LOS) as “a descriptive statement of the services provided to the public to satisfy a visitor need and/or meet policies and directives. LOS is usually expressed in quantitative and qualitative terms.” The Directive assigns the Superintendent with the ultimate responsibility for having appropriate level and types of public safety services defined for their national park or national historic site. The Mountain Parks produced a document titled “Levels of Service for Visitor Safety (1995)” as guidance for defining LOS for public safety programs. The document outlines LOS for different aspects of the Public Safety Program: risk assessment, planning, different elements of prevention, search and rescue, and communication.

Levels of public safety services are defined by Resource Conservation Managers, or the delegated public safety staff, and subsequently approved by the Superintendent as part of the
overall public safety plan. Superintendents also bring a field unit level financial reality perspective as well as a cross-functional approach to visitor safety service delivery.

The Evaluation found that field units with a public safety plan, have generally identified service levels as part of their planning process. The appropriateness of LOS depends on the quality of the visitor risk assessment process, which in turn is based on information relating to potential visitor safety hazards, participation rates in activities, and incident rates. The parks and sites that have not completed a recent (e.g. in the last 3 years) risk assessment exercise, or do not have reliable data related to public safety, may be offering inappropriate levels of services, potentially focused in the wrong areas. Also, without a recent formal and documented approach, the field units may be unable to show due diligence process in providing services.

The other factor that has affected the setting of service levels or ability to meet those in place is the availability of resources. In the absence of sufficient resources, many field units work with other agencies and jurisdictions to ensure a higher level of service than Parks Canada could afford on its own.

Another consideration in demonstrating due diligence is consistency in service levels among similar parks and sites, including the capability to respond to incidents. As discussed in the roles and responsibilities section, the National Office has a policy and direction role to set national standards for field units to follow. Service Centres could help field units to comply with provincial requirements, explore and establish inter-agency agreements, identify training and equipment standards. For example, for national marine parks and the NMCAs, standards need to be adopted for purchasing boats and training of boat operators. Common standards would help to ensure a minimum level of consistency among field units with a marine environment.

Interviews with field unit staff indicate that Parks Canada generally has the capability at the present time to meet stated levels of service, and field units are able to show due diligence, for example, closing trails as needed, informing public of risks, etc. However, with an aging public safety staff at field units where highly skilled and certified staff are needed to provide services, the capability may not continue to be there in the future. At some sites, frequent staff turn over undermines the field unit’s ability to deliver public safety service. The turn over creates a constant need for training, puts pressure on scarce resources, and causes a transition period during which there are few experienced public safety staff available.

Finally, there is also a need to better communicate to visitors the types and service levels available at the sites they plan to visit. This could be done first and foremost through Parks Canada’s website, but also through mail out packages, travel agents, guiding companies, and other such channels. Visitors, particularly those taking part in higher risk activities, need to be informed before they visit the more remote national parks, such as those in the North, where there is little immediate response capability for search and rescue. The Agency at present time has little or no data to assess its success in communicating public safety messages to visitors.
Recommendation

It is recommended that, following a risk assessment process, field units identify service levels in their public safety plans, ensure they have the capability to meet them, and communicate services levels to their visitors. It is further recommended that the National Office define a national approach, and the Services Centre assist in the planning and evaluation of the public safety plans.

Issue 6: Public safety prevention activities are focused appropriately in relation to the site, its geographic location, range of activities and visitors

Potential Risk:

- Inadequate / inappropriate prevention activities
- Inability to achieve program goals

Findings

Prevention includes any effort taken before an incident occurs to reduce the likelihood or probability of the incident. Given the inherent risks presented in many of the field units’ front and backcountry areas, as well as their remoteness and difficult access to assistance, it is imperative that prevention forms a critical element of the Public Safety Program. The Bulletin 4.4.3 states that Parks Canada will place a high priority on providing comprehensive incident prevention and visitor risk management programs to minimize the potential for loss. Further, the Agency will place high priority on providing information and advice to assist park users in selecting and planning recreational activities matching their levels of physical fitness, technical ability, provisioning and equipment.

Field units plan and deliver a range of prevention activities. These activities aim at providing awareness of potential and inherent hazards at the national parks and national historic sites, education on how to avoid potential personal injury, and active measures to minimize hazards to visitor safety.

Awareness and education programs include signage, mandatory and voluntary orientation sessions including videos and talks for visitors, communities and local employers and employees, information billboards, avalanche bulletins, pamphlets, etc. Active measures include regular inspections of facilities, trail maintenance, erecting railings and fencing, limiting public access depending on hazards and risk, etc.

For prevention activities to be effective, they need to address regular assessment of safety risks and communication of those risks to visitors. In doing so, a number of factors including analysis of incident data, participation rates and patterns, and emerging activities need to be taken into consideration. The Evaluation found that field units that have a public safety plan or those that
update their plan on a regular basis have a more strategic and formal approach to planning prevention activities. The Evaluation findings also indicate that the National Office should lead a national strategic approach to identifying emerging program risks and to prevention planning. Again, this calls for availability of national incident and risk assessment data for testing program hypothesis and responding proactively to visitor safety challenges. In the absence of reliable national incident and strategic data, the program currently is limited in its ability to be strategic in prevention planning.

The Evaluation also found that few sites formally evaluate their prevention activities to determine if they have the desired results, and to what extent they reduce incidents and risk to visitors’ safety. Interviewees alluded to lack of resources and expertise as reasons for not assessing prevention programming. Further to the discussion of role and responsibilities above, evaluating prevention programming is another potential area Service Centres could provide support to the field units. Working with the National Office, Service Centres could assist field units with a consistent methodology, templates, and ongoing support for evaluating prevention programs. National Office and the Service Centres should also provide a risk management material focused on the needs of field unit management teams and their responsibilities in the context of the Public Safety Program.

Another important aspect of public safety programming is a cross-functional approach to prevention activities linking resource conservation, heritage presentation and communication activities to the delivery of public safety. This approach would greatly increase success in reaching visitors and communicating safety messages.

**Recommendation**

It is recommended that field units undertake prevention activity planning as part of the regular updating and redrafting of their public safety plans. Prevention planning should follow a risk-assessment process, and be based on an analysis of public safety data. It is also recommended that field units, Service Centres and the National Office work collaboratively on a strategic approach to prevention programming nationally, and measurement of program outcomes.

**Issue 7: Accurate public safety incident data: definition, standards, and processes**

Potential Risk:

- Unreliable public safety data
- Inability to determine program effectiveness, and allocate resources effectively
- Inability to report on program performance

**Findings**
Accurate national incident and severity data is key for tracking visitor safety over time and showing a decreasing trend or an increase in the numbers. This type of data is essential for setting program goals and performance expectations, deciding on resource allocation, assessing and reporting program performance. In order to have reliable public safety incident data, the field units need to have a common definition of what constitutes an incident, and what standards should apply to ensure nationally consistent visitor safety data.

Public Safety Bulletin 4.4.1 defines an incident as “an unplanned event in which the action or reaction of an object, wildlife or person has the potential to cause personal injury or property loss”. However, the Bulletin does not provide any standard for monitoring and reporting of incidents. Field units generally determine what incidents to include or exclude in their data. As a result, what is tracked and recorded may vary significantly across the country. For example, some field units record all traffic accidents to which they respond as public safety incidents, while other field units record only vehicle-wildlife collisions. Not all road accidents involve visitors, thus, current incident rates may not reflect accurately on visitor safety within parks and sites. Another example involves field units that track incident data on a calendar year basis as opposed to fiscal year (as done by most field units) required for corporate reporting purposes.

Currently, Parks Canada can report safety data only on a field unit basis, but not nationally. This issue is recognized by Parks Canada and the program is currently working to address data quality and standards-related issues through the implementation of the national Occurrence Tracking System (OTS). The OTS will adopt colour-coded categories of incident severity so the Agency will be able to report accurately on incident rates and on their severity. These categories will consist of Green (an uninjured victim, or non-life threatening injuries), Yellow (potentially life threatening injuries), Red (life threatening injuries) and Black (deceased). The full implementation of the OTS is expected in summer of 2005, and should allow analysis and reporting of incident data nationally. The Agency will be able to use this data to report on visitor safety and program effectiveness across the system.

The Evaluation conducted a survey of field units using the colour-coded approach described above to collect incident data for the five-year period 1998-1999 to 2002-2003. The data on incidents involving a park assisting another jurisdiction in search and rescue outside the boundary of the park were not included. The survey also asked field units to state their level of confidence in the data, based on the availability of supporting records. Twenty-one respondents indicated “high level of confidence” (complete records), 15 reported, “moderate level of confidence” (partial records, or complete records for some of the data), and one reported ‘low confidence” (inadequate data). It is important to note that this data has not been audited against field unit records.

Another factor that affects the reliability of incident data is the field units’ ability to capture and record all incident data. This is particularly an issue where other agencies such as the Coast Guard, the RCMP or the provincial authorities respond to incidents. Some interviewees said that they may not be aware of all visitor safety incidents occurring within their site. Not all field
units have the necessary arrangements in place to access incident data related to their field units from other agencies or jurisdictions.

### Public Safety Incident rates, 1998-1999 to 2002-2003

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<tbody>
<tr>
<td>No or Non-life threatening</td>
<td>1,460</td>
<td>1,462</td>
<td>1,480</td>
<td>1,353</td>
<td>1,400</td>
<td>7,155</td>
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<tr>
<td>Potentially life threatening</td>
<td>88</td>
<td>114</td>
<td>105</td>
<td>104</td>
<td>133</td>
<td>544</td>
</tr>
<tr>
<td>Life threatening</td>
<td>51</td>
<td>52</td>
<td>67</td>
<td>65</td>
<td>51</td>
<td>286</td>
</tr>
<tr>
<td>Death</td>
<td>32</td>
<td>36</td>
<td>19</td>
<td>34</td>
<td>40</td>
<td>161</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>1,631</strong></td>
<td><strong>1,664</strong></td>
<td><strong>1,671</strong></td>
<td><strong>1,556</strong></td>
<td><strong>1,624</strong></td>
<td><strong>8,146</strong></td>
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The public safety incidents data above indicates that generally the rate has remained constant over the five-year period, with the majority of incidents involving minor or non-life threatening injuries. Most of the deaths and life threatening injuries were reported by the Mountain Parks in Alberta and British Columbia, where people engage in higher risk backcountry activity such as skiing and different forms of climbing. Field units seek to minimize the number of such injuries and deaths through prevention and search and rescue response service while recognizing that it is unlikely that the number of incidents can be reduced to zero. Given that there are over 26 million person visits annually to Canada’s national parks and national historic sites, the incident figures above indicate that visitors enjoy a very high level of safety.

**Recommendation**

It is recommended that the Occurrence Tracking System be fully implemented and adopted by all field units. Further, necessary standards be developed to ensure that consistent national public safety incident data is collected. It is recommended that field units put in place the necessary arrangements with other federal departments and agencies, and other jurisdictions to acquire public safety data related to incidents at national parks and national historic sites.
5.0 CONCLUSION AND SUMMARY OF THE RECOMMENDATIONS

The Evaluation has assessed the Public Safety Program’s policy framework, and examined issues related to its management and administration. It is important to note that while a number of areas have been identified for improvement and strengthening in this report, interviewees believe that the Program is effective in managing public safety risks at national parks and national historic sites, and in providing highly safe use and enjoyment opportunities for visitors. The program has highly dedicated and experienced staff that is knowledgeable about hazards at their sites and ways of mitigating risks to visitor safety. Nevertheless, with an aging workforce and expected staff retirements, it is imperative that Parks Canada ensures succession planning particularly in areas of specialized public safety delivery such as high angle rescue and marine environment.

The examination of the Evaluation issues has shown that the Program Policy Framework needs to be updated, and communicated to all field units and Service Centres. The Program needs to improve and better document program planning and reporting processes in order to fully demonstrate due diligence. There also needs to be a strategic focus on prevention service delivery, including better anticipation of developing patterns of visitor participation in activities, and effective focusing of awareness and educational products. The Evaluation findings point to a need for standardization of basic training and the tracking and reporting of safety incidents.

Recommendations

1. It is recommended that the Public Safety Policy Framework be reviewed, updated and re-issued to provide clear direction and guidance on the different elements of Parks Canada’s Public Safety Program.

2. It is recommended that Parks Canada review and define the roles and responsibilities of the field units, the Service Centres and the National Office in a new Program Policy Framework.

3. It is recommended that all field units be required to have an approved public safety plan that is based on a risk assessment of potential hazards to public safety within the parks and sites. Further, field units should be required to update their safety plan on a regular basis as outlined in the Program Policy Framework.

4. It is recommended that the National Office provide, in a new Public Safety Program Management Directive, clear guidelines for developing basic public safety training standards.

   It is further recommended that there be ongoing monitoring by the Program to ensure that training standards are applied consistently across the Agency.
5. It is recommended that, following a risk assessment process, field units identify service levels in their public safety plans, ensure they have the capability to meet them, and communicate services levels to their visitors.

6. It is recommended that field units undertake prevention activity planning as part of regular updating and redrafting of their public safety plans. Prevention planning should follow a risk-assessment process, and be based on an analysis of public safety data. It is also recommended that field units, Service Centres and the National Office work collaboratively on a strategic approach to prevention programming nationally, and measurement of program outcomes.

7. It is recommended that the Occurrence Tracking System be fully implemented and adopted by all field units. Further, necessary standards be developed to ensure that consistent national public safety incident data is collected. It is recommended that field units put in place the necessary arrangements with other federal departments and agencies, and other jurisdictions to acquire public safety data in protected heritage areas.
PROGRAM MANAGEMENT RESPONSE

Recommendations/Management Response

1. It is recommended that the Public Safety Policy Framework be reviewed, updated and re-issued to provide clear direction and guidance on the different elements of Parks Canada’s Public Safety Program.

Agree

The Public Safety Policy Framework will be reviewed, updated and re-issued as a single combined directive (Interim Bulletin 4.4.3 Public Safety Management and Management Directive 3.1.3 Public Safety Measures for National Historic Sites and Canals).

The framework will focus on bringing a national consistency to public safety planning, prevention, risk management, training, delivery, monitoring and reporting in a manner that is appropriate to the scale of issues found in the wide variety of Protected Heritage Areas.

Responsibility: Director General – National Parks
Timeline: 18 months

2. It is recommended that Parks Canada review and define the roles and responsibilities of the field units, the Service Centres and the National Office in a new Program Policy Framework.

Agree

The new Policy Framework will provide clear roles and responsibilities for Field Units, Service Centres and National Office. The capacity of the National Office will be strengthened in the area of data management and analysis in support of a science approach to public safety planning and management.

Responsibility: Director General – National Parks
Timeline: 18 months

3. It is recommended that all field units be required to have an approved public safety plan that is based on a risk assessment of potential hazards to public safety within the parks and sites. Further, field units should be required to update their safety plan on a regular basis as outlined in the Program Policy Framework.
Agree

The Policy Framework will indicate the requirement for:
- Approved Public Safety Plans in all Protected Heritage Areas based on risk assessment
- Public Safety Plans to be developed, reviewed and updated on a specified schedule

National Office will streamline the Visitor Risk Management Handbook and simplify its application to the broad spectrum of Protected Heritage Areas.

Responsibility: Director General – National Parks
Timeline: 12 months

4. **It is recommended that the National Office provide, in a new Public Safety Program Management Directive, clear guidelines for developing basic public safety training standards.**

   **It is further recommended that there be ongoing monitoring by the Program to ensure that training standards are applied consistently across the Agency.**

Agree

The Policy Framework will identify mandatory minimum national training standards for park staff involved at varying levels in the public safety program. It will also provide a framework to identify competencies, training standards and options for public safety training delivery.

Responsibility: Director General – National Parks
Timeline: 18 months

5. **It is recommended that, following a risk assessment process, field units identify service levels in their public safety plans, ensure they have the capability to meet them, and communicate services levels to their visitors.**

Agree

The Policy Framework will:
- Require the assessment of an appropriate level of service through the public safety planning process
- Require that these levels of service be clearly communicated to the public

The National Office will develop a public safety planning template as part of the Policy Framework.

Responsibility: Director General – National Parks
Timeline: 18 months

6. It is recommended that field units undertake prevention activity planning as part of regular updating and redrafting of their public safety plans. Prevention planning should follow a risk-assessment process, and be based on an analysis of public safety data. It is also recommended that field units, Service Centres and the National Office work collaboratively on a strategic approach to prevention programming nationally, and measurement of program outcomes.

Agree

The Policy Framework will require that:

- Public safety plans be reviewed and updated on a specific schedule
- Public safety plans be developed through a risk-assessment process
- Public safety data be collected and analyzed as part of prevention planning and risk-assessment.

The Policy Framework will clarify roles and responsibilities and specify a multidisciplinary approach to prevention planning and establishing and monitoring performance measurements and outcomes.

Responsibility: Director General – National Parks
Timeline: 18 months

7. It is recommended that the Occurrence Tracking System be fully implemented and adopted by all field units. Further, necessary standards be developed to ensure that consistent national public safety incident data is collected. It is recommended that field units put in place the necessary arrangements with other federal departments and agencies, and other jurisdictions to acquire public safety data in protected heritage areas.
Agree

The Policy Framework will identify the requirement to record all public safety incidents in the Occurrence Tracking System (OTS).

The Policy Framework will require that Field Units establish arrangements to collect all public safety data (e.g. vehicle accidents) from other departments or agencies where these incidents have occurred in Protected Heritage Areas.

The National Office will develop an OTS user manual to ensure that public safety incident data is collected diligently and consistently in all Protected Heritage Areas.

Responsibility: Director General – National Parks
Timeline: 12 months

The National Office will strengthen the science capacity to improve prevention planning and public safety reporting by staffing an OTS Database Analyst.

Responsibility: Executive Director – Ecological Integrity Branch
Timeline: 6 months