

# **Public Involvement Audit**

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The Office of the City Auditor conducted this project in accordance with the International Standards for the Professional Practice of Internal Auditing

# **Public Involvement**

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# **Executive Summary**

Public involvement in civic activities and decision-making supports transparency and trust between the City of Edmonton and citizens. Over the past few years, both Council and citizens have identified a need to improve the City's public involvement process. There are multiple initiatives or projects currently underway with this purpose – both within the City and in its partner organizations. Consequently, this report will inform and support the existing joint Council/Corporate initiative rather than make recommendations to Administration. The Office of the City Auditor will review the work of this initiative to evaluate progress regarding the issues identified in this audit.

The audit had three objectives.

- 1. To evaluate the alignment of expectations between City Council, Administration, and the public.
- 2. To evaluate Administration's compliance with City Policy C513, *Public Involvement* and the *Involving Edmonton Framework*.
- 3. To evaluate the effectiveness of the public involvement process.

We found that Administration was compliant with City Policy C513, *Public Involvement* and the *Involving Edmonton Framework*.

We identified the following issues with the public involvement process.

- 1. The Policy and Framework were not fully aligned to the expectations of Council and the public, and did not define the intended outcomes of the public involvement process.
- 2. The Framework guided Administration to identify only one decision and decisionmaker for a public involvement process. This does not reflect the reality of decision-making at the City.
- Council and the public did not consider 'information sharing' to be involvement; however, information sharing was a common purpose for public involvement activities.
- 4. Stakeholder identification has not always been effective.
- Public involvement (e.g., open houses) is used as the default method for understanding the public perspective. There may be more appropriate methods (e.g., surveys).
- 6. There can be difficulty balancing the City's expert-based, quantitative information with the information provided by a community when making decisions. The City and the community may have different perspectives on what success looks like.
- 7. Administration is expected to be objective; however, this may not always be practical as they work towards the City's strategic goals.
- 8. Public meetings and open houses are not designed to encourage dialogue.

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# **Public Involvement Audit**

# 1. Introduction & Objectives

The Office of the City Auditor (OCA) 2014 Annual Work Plan included an audit of the City's Public Involvement processes. Public involvement in civic activities and decision-making supports transparency and trust between the City and its stakeholders.

In late 2013 and early 2014, Council, the Corporate Leadership Team (CLT), and the OCA all identified the need to review and improve the City's public involvement processes. This audit focused on three objectives:

- 1. Evaluating the alignment of expectations between Council, Administration, and public stakeholders.
- 2. Evaluating Administration's compliance with Policy C513, *Public Involvement* (Policy) and the *Involving Edmonton Framework* (Framework).
- 3. Evaluating the effectiveness of the City's public involvement processes.

Council, Administration, and members of the public often use the terms 'public involvement,' 'public engagement,' and 'public consultation' interchangeably. For the purposes of this audit, we considered public involvement to include the methods City employees use to engage the public as per the Framework. This includes public meetings, open houses, focus groups, and other means of communication and consultation.

# 2. Background

The City began to formalize its public involvement processes in the mid-2000s. In response to citizens' expectations to be more involved in decisions that affected them, the City developed its public involvement Policy and Framework. They used the principles and approaches of the International Association of Public Participation (IAP2)<sup>1</sup> as a starting point.

#### Policy Development

City Council approved City Policy C513, *Public Involvement* in November 2005. The Policy endorsed a Public Involvement Framework, consisting of:

• Core Commitments and Standards of Practice to outline the City's position and values related to public involvement.

<sup>&</sup>lt;sup>1</sup> IAP2's mission is to advance and extend the practice of public participation (http://www.iap2.org).

- Continuum of Public Involvement to guide the scope and purpose of public involvement activities.
- Public Involvement Roadmap to outline the high-level process for developing a Public Involvement Plan document.

*Involving Edmonton - A Public Involvement Initiative* handbook was developed to support the implementation of the Policy. The City designed this workbook to guide staff through the Framework to develop a comprehensive Public Involvement Plan for each engagement. The City published the second edition of *Involving Edmonton* in 2008. There have been no updates or revisions since 2008.

#### Office of Public Engagement

The City created the Office of Public Involvement in 2006 to support the City's decentralized approach to public involvement. The purpose of the Office was largely advisory, with public involvement activities led by departmental Project Managers. The Office evaluated potential information systems to capture, share, and report on the City's public involvement processes and led the implementation of *Consultation Manager*, a web-based system. It also promoted awareness of the Policy and Framework to external stakeholders. It was renamed to the Office of Public Engagement in 2012 when it was moved under Corporate Communications. The City discontinued the use of *Consultation Manager* in 2012 due to lack of use, an unfriendly user interface, and high monthly fees. It was replaced by an interconnected calendaring system and is cost-shared with the Edmonton Economic Development Corporation.

The Office of Public Engagement estimates that more than 70 business units (branches, sections, or units) have some responsibility for public involvement. Three departments - Transportation Services, Sustainable Development, and Community Services - conduct the majority of public involvement activities in the City.

#### Centre for Public Involvement

The Centre for Public Involvement is a jointly funded initiative between the City and the University of Alberta. Its mission is "to provide leadership in understanding and applying innovative public involvement ideas, practices, and technologies for citizen participation and deliberation through its partner organizations." Its first full year of operation was in 2012. Since inception, it has collaborated with a number of City departments and branches to apply and research innovative public involvement practices.

# 3. Scope & Methodology

We assessed three factors that influence the effectiveness of any process. These are:

- Clarity Clear, shared expectations of what the process is meant to achieve,
- Compliance Whether or not the process was followed, and
- Effectiveness Whether or not the process was valid.

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We interviewed each member of City Council, employees within Administration with responsibility for the public involvement process, and public stakeholders. We evaluated the consistency of the stakeholders' expectations for the public involvement process. We then reviewed selected public involvement activities to determine whether they complied with the City's Policy and Framework.

Finally, we reviewed and analysed all interview data, media coverage, and a selection of Council meetings and public hearings to assess the degree to which the processes met the expectations of Council.

To achieve our objectives, we conducted an in-depth evaluation of the public involvement process for two selected projects:

- The development and implementation of on-street bike routes; and
- The development of surplus school sites.

We also interviewed public stakeholders to understand their experiences with public involvement for the following projects:

- A community revitalization initiative;
- Traffic control infrastructure;
- LRT development;
- On-street bike routes; and
- Surplus school site development.

We attended the following public involvement meetings to observe public consultation activities:

- The development of a streetscape;
- A rezoning application;
- A 'Building Great Neighbourhoods' project;
- Traffic shortcutting in neighbourhoods;
- A traffic safety initiative; and
- The development of a strategy for infill.

The specific issues identified in this report may not be applicable to all business units who conduct public involvement activities on behalf of the City. These findings should not be generalized to the City as a whole; however, they do reflect issues that were relatively common across our sample.

# 4. Results and Analyses

# 4.1. Objective 1: Alignment of Expectations

This section of the report addresses whether the expectations of City Council, Administration and the public are aligned. City Council is responsible for establishing performance expectations for Administration. City Policy C513, *Public Involvement* documents these expectations. The Public Involvement Framework is an interpretation of the Policy requirements and provides active guidance to Administration as they conduct public involvement activities. There is a high risk that the public involvement process will not meet Council or public expectations if there is misalignment between the guidance provided to Administration and the expectations of Council and the public.

Through our interviews with Council, we identified 11 expectations for the public involvement process<sup>2</sup>. We compared these expectations to those documented in the Policy and Framework. We interviewed representatives from a number of public organizations (i.e., Edmonton Federation of Community Leagues, Save Edmonton's Downtown Footbridge, individual community leagues) to determine public expectations and specific areas of concern. We then compared Council's expectations to the expectations of the public. Table 1 provides the results of these comparisons.

Although Council, the public, and the Policy and Framework may all share the same expectations for the public involvement process, this does not mean that the process is meeting those expectations. We address the effectiveness of public involvement in Section 5.3.

		Aligned to		
	Council Expectations	Policy	Framework	Public Expectations
1.	Dialogue and information exchange	Х	Р	$\checkmark$
2.	Diverse perspectives included	$\checkmark$	$\checkmark$	$\checkmark$
3.	Public input is used	$\checkmark$	$\checkmark$	$\checkmark$
4.	Administration is objective	Р	Р	$\checkmark$
5.	Roles are defined	Р	Р	Р
6.	Process is transparent	Х	$\checkmark$	$\checkmark$
7.	Clear value of public involvement activities	Х	Х	Х
8.	Accessible and accommodating	$\checkmark$	$\checkmark$	$\checkmark$
9.	Facilitated well	Х	Х	Р
10.	Information is available	$\checkmark$	Р	$\checkmark$
11.	Takes a community perspective	Х	Х	$\checkmark$

#### Table 1: Summary of Council Expectations of the Public Involvement Process

Legend:  $\checkmark$  - Aligned X - Misaligned P – Partially Aligned

This table shows that the Policy and Framework provide appropriate guidance to Administration to meet three of the 11 expectations. The Policy and Framework do not provide appropriate guidance to meet the remaining eight expectations. The following

<sup>&</sup>lt;sup>2</sup> Council validated 12 expectations. Expectations which emerged as substantially similar were later combined to avoid duplication.

sections summarize our observations on the alignment for each of Council's expectations.

# 4.1.1. Dialogue and Information Exchange

Council expected public involvement to be a dialogue between the City and the public where information is exchanged. Both Council and members of the public indicated that informing people about decisions after the fact was not involvement, engagement, or consultation. However, the Continuum of Public Involvement contained in the Policy and Framework documents identify 'information sharing' as one type of public involvement (Figure 1). The Framework is partially aligned as it contains additional information that encourages dialogue and information exchange. The Policy has no other indicators of dialogue or information exchange. This inconsistency allows information sharing activities to be classified as public involvement.

Sharing Information	Consultation		Active Participation						
Public Involvement Building Blocks:									
Sharing information to build awareness	Testing ideas or concepts to build knowledge	Collaborating to build commitment	Sharing decision- making to build ownership	Delegating decision-making to build responsibility					
The purpose of this level of involvement is:									
To present information to the public about issues that may affect them.	To provide information and receive feedback or comment.	To involve stakeholders in the development of solutions.	To partner with stakeholders in the development of recommendations.	To give stakeholders the responsibility for making the decision.					

### Figure 1: The Continuum of Public Involvement

Source: Policy C513, Public Involvement

### 4.1.2. Diverse Perspectives Included

Council expected that public involvement include diverse perspectives from those who are in favour of a project and from those opposed. The Policy and Framework both clearly reflect this expectation. Members of the public also has this expectation and were critical of processes where they believe diverse stakeholder perspectives were excluded.

### 4.1.3. Public Input is Used

Council expected that input from the public was not just gathered, but also actually used when making decisions. Members of the public shared this expectation. They indicated that when their input was not used, the public involvement process had no value to them. Both the Policy and Framework include this expectation.

Although there is a consistent expectation that public input be used, there was disagreement on *how* that input be used. Both Council and Administration indicated that public input is only one consideration when making decisions. Depending on the decision, however, some members of the public expected their input be a fundamental consideration in making a decision. They believed that the information they had shared

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was valuable enough to have a decision reconsidered. They also believed that decisions ought to be reconsidered when Administration did not follow the City's policies and processes for public involvement.

#### 4.1.4. Administration is Objective

Council and the public expected Administration to be objective when:

- Acquiring knowledge from the public;
- Sharing information with the public; and
- Sharing information with decision-makers.

The Policy does not include the expectation that Administration be objective when interacting with the public. However, the Framework states that Administration should present information to the public that does not promote any particular position or project.

Council and members of the public expected to receive objective information from Administration. This expectation is clearly documented in the Policy. The Framework is less clear. Although this expectation is implied, there are no statements requiring the information provided to the decision-maker be objective. During our interviews, both Council and members of the public indicated their belief that Council is not provided with a balanced perspective for decision-making.

#### 4.1.5. Roles are Defined

Council perceived themselves as having the role of a decision maker. Members of the public perceive Council as having this role, but acknowledge Administration also makes decisions. Within a single project, there can be multiple decisions and multiple decision-makers. The Policy does not recognize this and the Framework requires the identification of one decision and one decision-maker. The lack of multiple decision-making roles in the Policy and Framework can result in a public involvement initiative where members of the public may not understand how their input is being used and by whom.

#### 4.1.6. Process is Transparent

Council and members of the public expected that Administration inform the public about how their input was used. The Policy does not include this expectation. The Framework explicitly mentions this as a requirement.

#### 4.1.7. Clear Value of Public Involvement Activities

Council expected that public involvement would be used when it added value. They did not expect public involvement for all projects. The Policy includes the statement, "people have the right to be involved in the decisions that affect them." The inclusion of this statement in the Policy implies that there ought to be public involvement for all decisions. The policy statement contributed to the public expectation of involvement in all decisions affecting them. In our interviews, members of the public referenced this policy statement to justify ongoing individual and public involvement for specific decisions in which they had a personal stake. The Framework does not provide any specific guidance to assist Administration in deciding when public involvement is required.

## 4.1.8. Accessible and Accommodating

Council expected that public involvement activities were accessible and accommodating for those who may face participation barriers such as language, childcare requirements, or time demands. Council indicated that this was an expectation shared by members of the public who were challenged by issues such as the timing of public meetings or personal commitments. The Policy and Framework explicitly address accessibility in terms of physical or cultural barriers. While all possible barriers to participation are not listed (and cannot be), stakeholder accessibility is discussed quite comprehensively in the Framework.

### 4.1.9. Facilitated Well

Council expected that facilitators had appropriate presentation and crowd-management skills. They indicated that this is not the same as having project expertise. In the Policy, there is no reference to the communication or crowd management skills of facilitators. The Framework only references the need to have skill sets beyond project management expertise. The members of the public we interviewed did not distinguish between the roles of the facilitator and the project expert; however, they expected both project expertise and facilitation skills to be part of the meeting.

# 4.1.10. Information is Available

Council expected that project information be readily available to the public. Members of the public shared this expectation. The Policy requires that information is accessible in a simple form and readily available to the public. The Framework talks about using simple, accessible language, but provides little guidance around content, accessibility, or making information widely available to the public.

### 4.1.11. Takes a Community Perspective

Council and public expected Administration to take a community or citizen perspective when conducting public involvement. This means considering how a project fits with other activities occurring in a community rather than limiting the scope to a single project or purpose. It also focuses on impacts for a community, rather than the technical aspects of the project itself. The City organization structure and department responsibilities are not relevant to this perspective, as members of the public were not concerned about departmental responsibilities or project ownership. Neither the Policy nor Framework reflects the expectation that Administration take this perspective when conducting public involvement.

# Summary

Overall, we found that there was alignment between the Policy, the Framework, and the expectations of the public for three of Council's expectations. The remaining eight are either partially aligned or misaligned. As the Policy and Framework provide guidance to Administration, this lack of alignment increases the risk that the public involvement process will not meet the expectations of Council and the public.

# 4.2. Objective 2: Compliance with the Public Involvement Policy and Framework

#### 4.2.1. The Public Involvement Framework

The Office of Public Involvement developed the Framework as part of the City's original Public Involvement Initiative. It provided a consistent approach for all public involvement processes conducted by the City. The Framework consists of three tools:

- 1) Core Commitments and Standards of Practice. These outline the City's position and values related to public involvement.
- 2) The Continuum of Public Involvement (Figure 1, page 5). This guides the scope and purpose public involvement activities.
- 3) The Public Involvement Roadmap (Roadmap) (Figure 2). This outlines the high-level process for developing a Public Involvement Plan document.

An extensive handbook supplements the Framework. The handbook includes detailed guidance, planning worksheets, and other documents to support compliance with the Framework when developing the Public Involvement Plan. The Public Involvement Plan describes the public involvement strategy and activities for the project.



#### Figure 2 – Public Involvement Road Map

Source: Involving Edmonton: A Public Involvement Initiative (2008)

# 4.2.2. Compliance Findings

We completed a detailed review of two City projects – on-street bike routes and surplus school sites – in order to evaluate compliance with the Policy and the Framework. We evaluated compliance using the Public Involvement Plan, planning worksheets, and documents provided in the Framework handbook. We also met with the employees involved with the projects and discussed aspects of the Framework.

To be compliant, the Public Involvement Plan had to demonstrate compliance with all three components of the Framework.

**Core Commitments and Standards** – Worksheets contained within the handbook included the requirement to identify the Core Commitments and Standards. This information was completed in these worksheets for both case studies.

**Public Involvement Continuum** – Both case studies referred to the purpose of the public involvement in the Public Involvement Plan. This purpose was clearly associated with a place on the continuum. Both the surplus school sites plan and the on-street bike routes plan identified informing and consulting as the purpose of the public involvement.

**Public Involvement Roadmap** – Both the surplus school sites plan and the on-street bike routes plan had completed worksheets and a complete Public Involvement Plan. These documents identified all of the requirements to be compliant with the Roadmap.

In our opinion, Administration has met the requirements to be compliant with the public involvement process as documented in the Policy and Framework.

### 4.2.3. Public Perspective on Compliance

The public and Administration can interpret the requirements of the Policy and Framework differently. When we spoke with members of the public, they perceived Administration as non-compliant. The Policy indicates, "the public has a right to be involved in decisions that affect them." Arguably, every decision made by the City, large or small, affects the public. There are no clear guidelines for what decisions should have public involvement. Members of the public may see the City as non-compliant when they are not involved in all decisions – in particular those that have specific interest for them.

# 4.3. Objective 3: Effectiveness of the Public Involvement Process

We considered the public involvement process effective when it met Council's expectations. Although we found that Administration was compliant with the Policy and Framework, we found eight issues that influenced the effectiveness of the process.

### 4.3.1. Undefined Policy Outcomes

We observed that the Policy does not describe what the public involvement process is intended to accomplish. It does not define any outcomes. This does not allow Council, Administration, or members of the public to evaluate the success of the process. We also observed that the Policy implies that the City conducts public involvement activities for the sake of the public. However, Council, Administration, and members of the public

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all indicated that the purpose of public involvement was to benefit the City by supporting better decisions. When there is no clear understanding of who is intended to benefit from the process and how, there is a higher risk that public involvement will be ineffective.

#### 4.3.2. Decision-making and Revisiting Decisions

In Section 4.1.5, we identified that the Framework mistakenly assumes that there is a single decision and decision-maker. We observed that three types of decisions occurred.

#### Strategic-Level

Strategic-level decisions are where Council establishes common goals and expectations for the City. We found that there was significant public involvement in decisions at a strategic level producing policy and guidance for Administration (i.e., "The Ways" and other master plans).

#### **Conceptual-Level**

Concept-level decisions are where Council or Administration develops plans and projects to achieve the City's goals and expectations. It is at the conceptual-level where members of the public have indicated a lack of meaningful consultation.

#### **Tactical-Level**

Tactical-level decisions are where Administration implements plans and projects to make them operational. There is strong public involvement to support tactical decisions related to implementation and operation of projects (i.e., addressing disabled parking concerns due to on-street bike route implementation).

Administration has indicated that there is difficulty involving the public at the conceptuallevel of decision-making. When Administration makes concept-type decisions, they may not know the impact of the decision on stakeholder groups. This creates difficulty identifying and engaging appropriate stakeholders who otherwise may have no incentive to be involved. After Council or Administration approves a concept and the project moved towards implementation, it is expensive to revisit previous decisions. The act of reconsidering decisions increases the cost of a project and the time required to complete it. Project cost and time are common measures used to evaluate the success of a project.

The summary of the on-street bike routes development process on the following page provides an example of the complexity of public involvement. It highlights some of the difficulties integrating public input into the specific project stages.

#### Public Involvement and Project Progression – On-Street Bike Routes

The development of the bicycle network followed the City of Edmonton project stages. Public involvement occurred primarily at the Strategy stage and the Design stage. Members of the public objected to the decisions made at the Concept stage, after the infrastructure was being designed and built. Transportation did not know the specific impacts on stakeholders until the Design and Build stages.

#### **City of Edmonton Project Stages**



#### **Strategy Stage**

There was significant public involvement in this stage with development of the Bicycle Transportation Plan in 2009. A comprehensive set of stakeholders were involved and provided input. This process resulted in the identification of a City-wide bicycle network.

#### **Concept Stage**

Stakeholders who lived or had interests along the routes were not specifically consulted about the location of the routes. This stakeholder group consisted of thousands of individuals along hundreds of kilometres of roads. At this stage, routes were known, but the bicycle infrastructure was not. Transportation did not know what the specific impacts of the routes would be to residents and businesses.

#### **Design Stage**

At this stage the bicycle infrastructure was identified. Traffic, safety standards, and other technical guidelines were the primary source of information used to make these decisions. The public involvement that occurred at this stage occasionally resulted in a change of infrastructure, but typically resulted in solutions to accommodate specific issues along the routes like disabled access and parking. Public input at this stage often challenged the specific routes that had already been determined.

#### **Build Stage**

At this stage, the infrastructure was constructed based on the decisions made in the previous project stages. Public involvement generally took the form of 'trouble-shooting' individual situations.

#### **Operate Stage**

Transportation manages the operation of the bicycle infrastructure. Public issues or input is channelled through 311 and other established road maintenance processes.

#### **Revisiting Decisions**

We also identified a gap in how public input is used when it is not specifically solicited through the public involvement process. There is currently no procedure to differentiate between the anticipated negative feedback on a decision and the unexpected or significant public pushback on a decision that may need to be reconsidered. We did not observe any instances where Administration initiated discussions with Council questioning the validity of previous decisions; however, we did observe Council initiating these discussions because of public feedback that came directly to them. When members of the public did not believe that their feedback was being seriously considered by Administration, they used Council to escalate issues. There is a clear belief from members of the public that the most effective way to have a decision reconsidered is to go to Council directly, not work through Administration.

### 4.3.3. Frequent use of 'Inform' as a Public Involvement Approach

Our review of Public Involvement Plans revealed that 'informing' was often identified as the purpose of public involvement activities. Although the Policy and Framework include 'informing' as a valid method of public involvement, neither Council nor members of the public consider one-way information sharing to be public involvement. We confirmed through interviews that members of the public expect to be consulted, not just informed. We found this was the case even when it was clearly stated at the public meeting that the purpose was to inform. With the exception of a rezoning proposal open house, the public meetings we attended intended to share information with the public with limited or no intent to gather or use input for decision-making. These meetings were to acquire tactical information, create awareness, change perceptions, or achieve buy-in. They did not meet the public's expectations for public involvement.

#### 4.3.4. Identification of Stakeholders

Members of the public criticized the public involvement process for excluding specific stakeholder groups. This was the case with the on-street bike routes example on the previous page. In that project, stakeholders who lived along the routes were not specifically consulted about the routes. The Policy requires that the process "involve the appropriate people at the appropriate time in the appropriate way." We found examples where project stakeholders were not engaged at the appropriate time in the appropriate way. In these instances, we noted that Administration made efforts to identify stakeholders in the public involvement plans, but did not identify the stakeholder groups that later spoke out.

During our review of public involvement plans, we observed that the 'general public' is a group that has been informed and consulted in a number of public involvement processes. Based on an example of a stakeholder identification procedure used by the Centre for Public Involvement, we do not believe that identifying the 'general public' as a stakeholder group is adequate practice. When a stakeholder is identified as 'general public' one cannot identify and accommodate the accessibility barriers that can hinder participation including scheduling meetings at appropriate times, having appropriate translation services, or having childcare available. Nor is it possible to target communications to attract stakeholders who may not be aware of a project or proposal.

We observed that demographic information about attendees was not collected from these public meetings. There was no way to know if the 'general public' who attended were representative of the Edmonton population.

#### 4.3.5. Public Involvement as a Default Approach

During Council meetings, we observed that Council has questioned Administration about the public involvement for specific projects and proposals. We also observed that a section to describe "Public Consultation" has been incorporated into the Council report template. The information provided by Administration in this report section does not discuss the rationale or outcomes of conducting public involvement. We observed that the content of this section has either indicated Administration's intent to comply with the Policy or has listed public involvement activities that had occurred. The activity listing included events that had a primary purpose of sharing information. This does not align to the purpose of Council's request for this type of information for decision-making.

Based on discussions with the manager of the Office of Public Engagement, we believe that Council perceives public involvement as the primary way to gather information. However, public involvement is not the only way to acquire this type of information. Other methods, such as market research, surveys, etc., may be more effective under certain circumstances and better meet the needs of both Council and Administration for information to support decision-making.

#### 4.3.6. Integration of Community Knowledge in Decision-making

Council identified that the intention of the public involvement process is to acquire community knowledge for consideration when making decisions. We observed that public knowledge is often qualitative and may contradict the quantitative information gathered by Administration. We also observed instances where members of the public acquired their own contradictory statistics. When there was conflict with a decision, we observed each party relied upon its own data to justify their position.

We observed that there was difficulty reconciling expert-based, quantitative information from the City with information provided by the community. Certain decisions relied heavily on technical standards and the City's quantitative data for justification. We reviewed two decisions for which members of the public disagreed with the decision and proposed alternatives to Administration's recommendations - one related to a proposed alternative to an on-street bike route and one decision related to a proposed LRT route. In both cases, we observed that Administration had evaluated the proposed alternatives and that the decision to reject them was based on rational, measurable criteria.

The issue of having on-street bike routes in front of schools provides a good example of the challenge of reconciling community knowledge with quantitative standards. There may be no quantifiable data indicating that these lanes are a safety hazard, however parents who drop their children off have indicated that they see near misses at the school and think it is only a matter of time until something happens. The data indicates that the lanes are safe, but they do not feel safe to this stakeholder group. The community knowledge gained through personal experience and observation conflicts

with the City's data.

#### 4.3.7. Objectivity

As discussed in Section 4.1.4, both Council and members of the public expect Administration to be objective. We reviewed a number of reports provided to Council by Administration. These were framed in terms of Administration's successful progress towards their goals. We found there was a strong, positive tone in the information provided to Council with little reference to the negative. The lack of opposing or alternative perspective allows the reports to be perceived as not objective and defensive of Administration's agenda.

Our interviews indicated that members of the public also perceive the information provided to them by the City at public involvement activities, and on Edmonton.ca, to be focused on the positive aspects of City decisions and does not provide any opposing perspectives. They considered this information to be public relations, not public involvement. They indicated that it was not balanced or objective.

We observed public meetings where the information provided was objective and where it was not. At one meeting, the information presented to the public focused strongly on the benefits of the project and did not address conflicting information or communityspecific concerns. The other had a strong community focus, clearly presented the positive and negative aspects of what was planned, and explained the rationale behind activities that may have negative consequences for specific citizens.

The example on the following page highlights how there can be a contrast between the perspective of the City and the perspective of the community. The development of surplus school sites highlights how members of the public perceived the City's perspective as lacking objectivity and not acknowledging the community's position.

#### **Objectivity and Community Perspective – Surplus School Sites**

When a community is developed, land is reserved for future schools sites as per the Municipal Government Act (MGA). When the school boards determine that schools will not be built on those sites, the land is deemed surplus. Since 2006, the City has acquired approximately 40 of these surplus school sites. In 2008, the provincial government amended the MGA, giving the City the ability to develop these sites for such purposes as libraries, fire halls, non-profit facilities, and affordable housing.

The City first determined if any sites were required for civic use (e.g., fire halls, libraries, parks, etc). If it was not required for this purpose, Administration recommended site use based on the City's strategic priorities. Community development plans had always indicated the intention to have a school building on these sites. The perspective of the City was that rather than a school, there would be some other type of building supporting the City's vision and long-term goal of more compact, liveable, and sustainable communities.

However, these sites had not been sitting vacant and unused. Communities were using many of these sites as park space or temporary sport fields. Assumptions about the continued use of these sites for those purposes were part of community plans and strategies. From a community perspective, it was not an exchange of one building for another. The community was losing an attraction or facility. The City's perspective that these facilities were temporary did not acknowledge this loss to the community.

The land use recommendations made by Administration and approved by Council aligned to the strategic goals of the City (i.e., developing senior's facilities, densification, and affordable housing). This was the perspective Administration shared with Council and the public in public hearings and public involvement events. Members of the public perceived this as one-sided with little consideration of community goals. They perceived that the community perspective was left out of the decision process and that land uses better suited to the community were not objectively considered.

### 4.3.8. Facilitation of Meetings and Promotion of Dialogue

Both Council and members of the public have an expectation for dialogue in public involvement activities. Both Council and the members of the public we spoke with indicated that this is not occurring.

We observed that meetings were often designed to tightly control the interaction between the City and the public. These tight controls were purposeful and intended to support the achievement of an objective. However, they also restricted dialogue and increased public dissatisfaction with the process. There was not an appropriate balance between controls and open discussion.

Based on our own observations and interviews with Administration and members of the public, we believe that there are a number of factors that can determine the amount and quality of dialogue at a public involvement activity.

In our opinion, these factors highlight the complexity of conducting effective public engagement.

- 1. Events were not designed to promote dialogue. They were designed to share information and/or acquire tactical information from the community. In these cases, techniques used to restrict dialogue included:
  - No public Q&A;
  - Static feedback mechanisms like index cards to write and submit questions; and
  - Locating subject matter experts in various locations throughout the room so that attendees are required to move from one person to another with their questions.
- 2. Members of the public can be confrontational even when asking questions in an information-oriented meeting. They can dominate a meeting and restrict the participation of others. This has discouraged meetings designed to allow for dialogue and discussion.
- 3. Activities are often facilitated by the technical experts with the intention of sharing their knowledge with the public and who may not have the skills to manage group dialogue.
- 4. When the intent of a public involvement activity is to provide information about an approved City project, the facilitator may not be willing or able to objectively manage dialogue which challenges the project concept and decisions which have already been made.
- 5. Facilitators may not be comfortable with the level of conflict that can occur at a public gathering. This can lead to personal concerns with safety and thus measures which can further reduce the opportunities for dialogue.

These issues were not present in all of the public involvement activities we observed or

about which we were informed. The issues we observed were situational and dependent upon a number of factors including the project type, the state or stage of the project, the mood of the public coming into the meeting, the conduct and knowledge of City employees, the familiarity of attendees with one another, and the perceived importance of the project on individuals.

# 5. Conclusions

Our first objective was to evaluate the alignment of expectations between City Council, Administration, and public stakeholders and identify whether or not all parties have similar expectations of the public involvement process.

We found misalignment between the expectations of the public involvement process as expressed by City Council, those shared by members of the public, and those documented in the Policy and Framework. We found that the Policy and Framework do not provide sufficient guidance to Administration to meet Council's expectations of public involvement.

Our second objective was to evaluate Administration's compliance with Policy C513: *Public Involvement* and the *Involving Edmonton Framework*. It is our opinion that Administration is compliant with the Policy and Framework as written. However, members of the public can interpret the Policy differently than Administration. This has resulted in a perception of non-compliance.

Our third objective was to evaluate the effectiveness of the public involvement processes executed by the City of Edmonton. Effectiveness was determined based on whether the process met the expectations of Council.

We found that the effectiveness of a public involvement process is highly situational. Although we identified eight issues that can influence the effectiveness of the process, these are not simple issues that can be easily broken down into cause-and-effect. Activities undertaken by Administration to improve the public involvement process will need to address this complexity.

In recognition of Council and Administration's initiative to improve the public involvement process, this audit does not make any formal recommendations. This audit report will be used as an additional source of information as the joint Council/ Administration initiative begins the task of understanding the current and future state of public involvement in all City departments and branches. The OCA will review the work of the initiative on a regular basis to evaluate progress in regards to the issues identified in this audit.

As discussed in our methodology, due to targeted sampling these findings should not be generalized to the City as a whole; however, they do reflect issues that were relatively common across our sample.

We would like to thank Council, Corporate Communications, Transportation Services, and Sustainable Development for their assistance and cooperation throughout this audit. We would like to express our particular appreciation to the various individuals, organizations, and community groups who were willing to share their experiences with us.