

# Staff Report



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To	Committee of the Whole
Service Area	Corporate Services
Date	Tuesday, May 5, 2026
Subject	<b>Building Permits Approvals and Inspections Value-for-Money Audit</b>

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## Recommendation

1. That the report titled 'Building Permits Approvals and Inspections Value-for-Money Audit' dated May 5, 2026 be received.
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## Executive Summary

### Purpose of Report

The purpose of this report is to provide Council the results of the Value-for-Money (VFM) audit of the City of Guelph's Building Permit Approvals and Inspections program. In Ontario, building permits are required for all construction and renovations. Building activity must comply with the Ontario Building Code. In 2025, City of Guelph issued 1,757 permits valued at \$450 million and conducted 29,701 inspections. This audit was conducted to assess whether the program is being administered in an economical, efficient, and effective manner, while complying with applicable legislation, regulations, and municipal policies. The review focuses on key processes related to permit intake, plan review, inspections, and enforcement, with the objective of identifying opportunities to improve service delivery, strengthen internal controls, optimize resource utilization, and enhance accountability and transparency. This review is particularly important given the role building services play in enabling safe, compliant, and cost-effective development. Ensuring that building permits are processed timely, inspections are performed accurately, and revenues are collected completely is essential to protecting public safety, supporting community growth, and maintaining fiscal accountability.

### Key Findings

- Audit testing confirmed that the building permit intake, review, and issuance processes are operating effectively and in full compliance with the Ontario Building Code (OBC) and the City of Guelph's internal procedures.
- Processing timelines consistently met the OBC mandated service standards, with no deviations identified. Permit numbering controls were functioning as intended, and no gaps or irregularities were observed. Controls over inactive applications were also found to be effective, with automated notices, defined follow-up procedures, and appropriate oversight by the Building Permit Coordinator.
- The inspection scheduling and allocation processes were found to be well-structured, consistently applied, and supported by effective workload

balancing controls. Inspections are automatically routed through AMANDA based on permit type and are manually balanced daily by designated staff to ensure equitable distribution among inspectors. Testing of 245 inspections confirmed that all were completed on the dates requested by applicants, with inspection reports issued the same day.

- Inspectors demonstrated compliance with OBC and zoning requirements, and documentation was consistently complete and properly retained. Qualification testing confirmed that all inspectors and plans examiners held valid Building Code Identification Numbers (BCIN)/registrations and met the Ministry of Municipal Affairs and Housing (MMAH) and Ontario Building Officials Association (OBOA) designation requirements.
- Inspection reports consistently referenced the applicable OBC provisions when deficiencies were identified, and deficiencies remained active in the system until fully resolved and verified. Inspector assignment practices supported continuity and accountability, with geographic allocation ensuring that the same inspector typically remained responsible for a project throughout its lifecycle. Follow-up inspections and enforcement actions were properly documented, and no outstanding deficiencies were observed in any of the sampled files.
- The audit confirmed that fee calculation and revenue recording processes are accurate, complete, and supported by strong system controls. For all sampled permits, fees were calculated correctly in accordance with Schedule A of the Building By-law, using the appropriate square footage and permit-type parameters. The Amanda system's automated fee logic prevents unauthorized adjustments, and all fee transactions were properly recorded and linked to the City's General Ledger.
- Audit work related to public-facing services found that the Building Services Division maintains effective customer-service practices, supported by defined response protocols, online access to permit information, and clear communication processes.
- Complaint handling, enquiry management, and applicant notifications were found to be timely and consistent with internal expectations. The AMANDA system supports transparency by providing applicants with automated updates at key stages, including completeness acknowledgment and inspection results.

### **Strategic Plan Alignment**

The recommendations identified are designed to close control gaps, strengthen processes and improve the internal control environment related to the Building Permits Approvals and Inspections. The audit supports the objective of Lead with accountability objective under the foundations theme.

### **Future Guelph Theme**

Foundations

### **Future Guelph Objectives**

Foundations: Lead with accountability

### **Financial Implications**

The audit recommendations are expected to strengthen the control environment within the Building Services department. Management has noted that implementation may require additional resources, and no specific funding or staffing has been identified at this time. Certain recommendations are also

dependent on Information Technology support, which is subject to existing multi-year project plans and competing corporate priorities. As a result, implementation timelines may be influenced by resource availability and corporate capacity.

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## **Report**

### **Background**

The City of Guelph's Building Services Division is responsible for administering the building permit approval and inspection process in accordance with provincial legislation, including the Ontario Building Code Act and related regulatory frameworks. Building permits are mandatory for most construction, renovation, and demolition activities within the city, covering residential, industrial, commercial, and institutional (ICI) developments. The permitting process is intended to ensure public safety, compliance with zoning and building requirements, structural integrity, and alignment with municipal planning objectives. The City's Building Services group also carries out mandatory inspections at key stages of construction to verify compliance with approved plans and applicable codes.

Permit applications in Guelph are managed electronically through the Guelph Permit and Application System (GPAS), an online platform that enables applicants to submit required documentation, manage application status, schedule inspections, and receive notifications. The shift to an entirely electronic submission and inspection booking system was implemented to improve accessibility, tracking, and administrative efficiency for both applicants and City staff. Applicants are required to upload architectural and engineering drawings in specified digital formats, and all files must meet technical and compliance criteria before a permit application is deemed complete. GPAS allows all types of building permit applications to be submitted online at any time. This also allows customers to review the status of their permits at their convenience.

The Permit Services team also has a kiosk located at their customer service desk to allow in-person assistance with GPAS. The kiosk is available to customers who may not have access to a computer or another electronic device to submit their application. For customers who need assistance but are not able to attend City Hall in person, a virtual screen-sharing option is available to assist them remotely.

The Ontario Building Code (OBC) is a regulation made under the Building Code Act. The focus of this provincially legislated service is to ensure the technical requirements of the OBC are met. The OBC contains minimum provisions respecting the functionality of buildings with reference to safety, health, fire protection, accessibility, energy efficiency and structural sufficiency. Building permit applications are reviewed by the Permit Services team to confirm that the minimum requirements of the OBC are met, and to ensure that all other applicable laws have been complied with.

Building permits are issued for all sizes and types of projects from a deck or shed, to a high-rise residential or large industrial building. The Province mandates that building permit applications be reviewed within set time frames which range from 10 to 30 working days. The approval process varies by project type. For residential permits, including home additions and accessory structures, applications are typically reviewed within an approximate 10 business day timeframe, contingent on submission completeness and the absence of deficiencies. Larger residential and

non-residential (ICI) projects undergo longer review periods, ranging between 15 to 30 business days, to accommodate more complex plan examinations and coordination with other City departments or external agencies where required. These external approvals may include heritage planning, engineering services, conservation authorities, and provincial ministries for designated projects.

Chart 1: Permits Issued by year

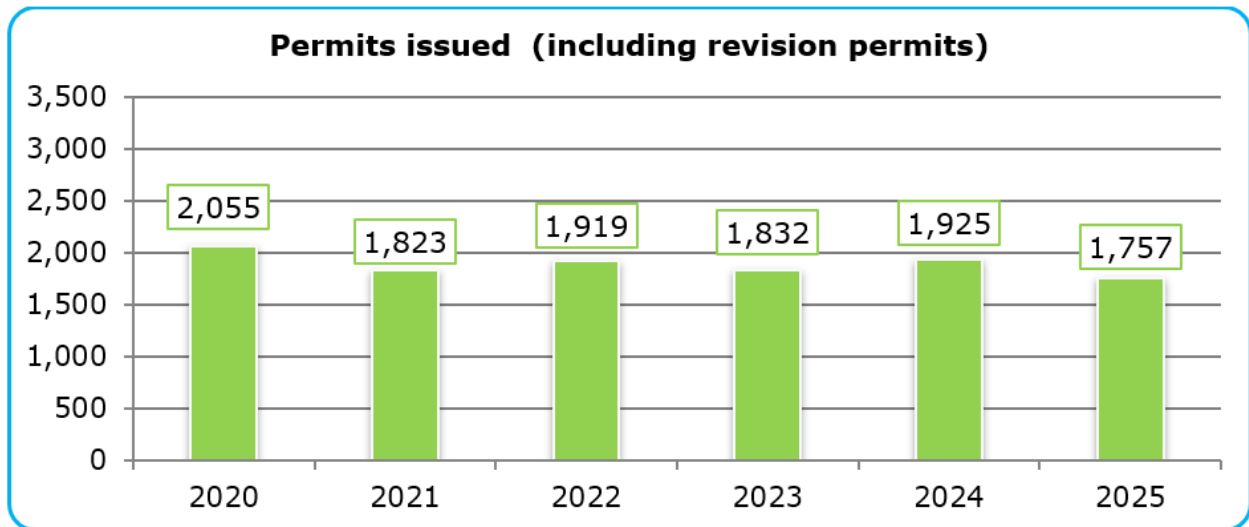
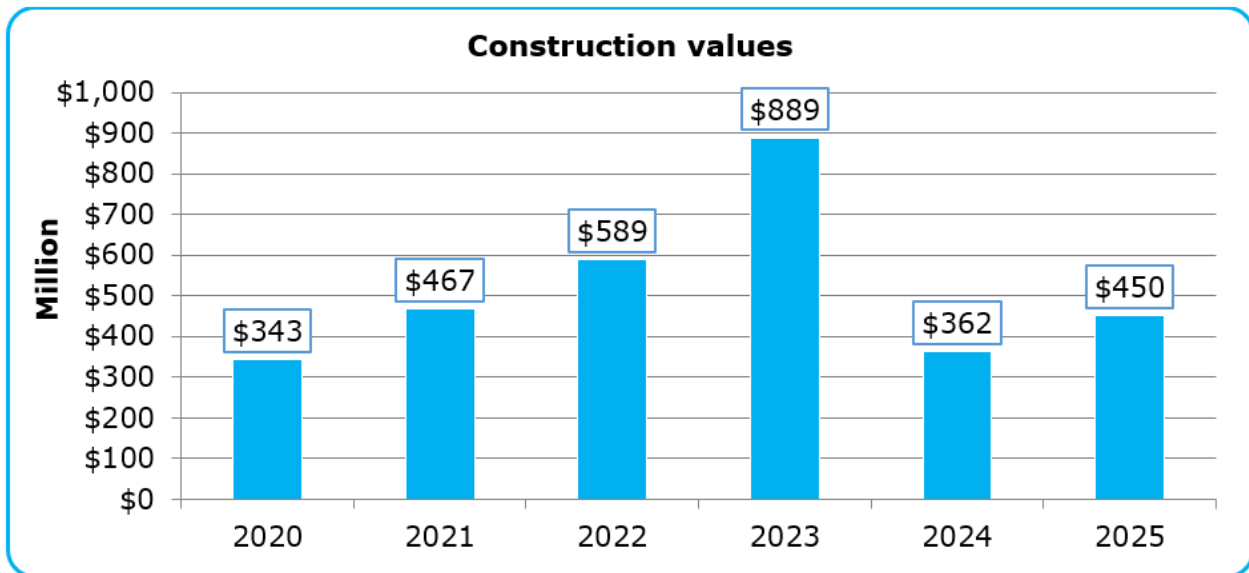


Chart 2: Construction Values by year

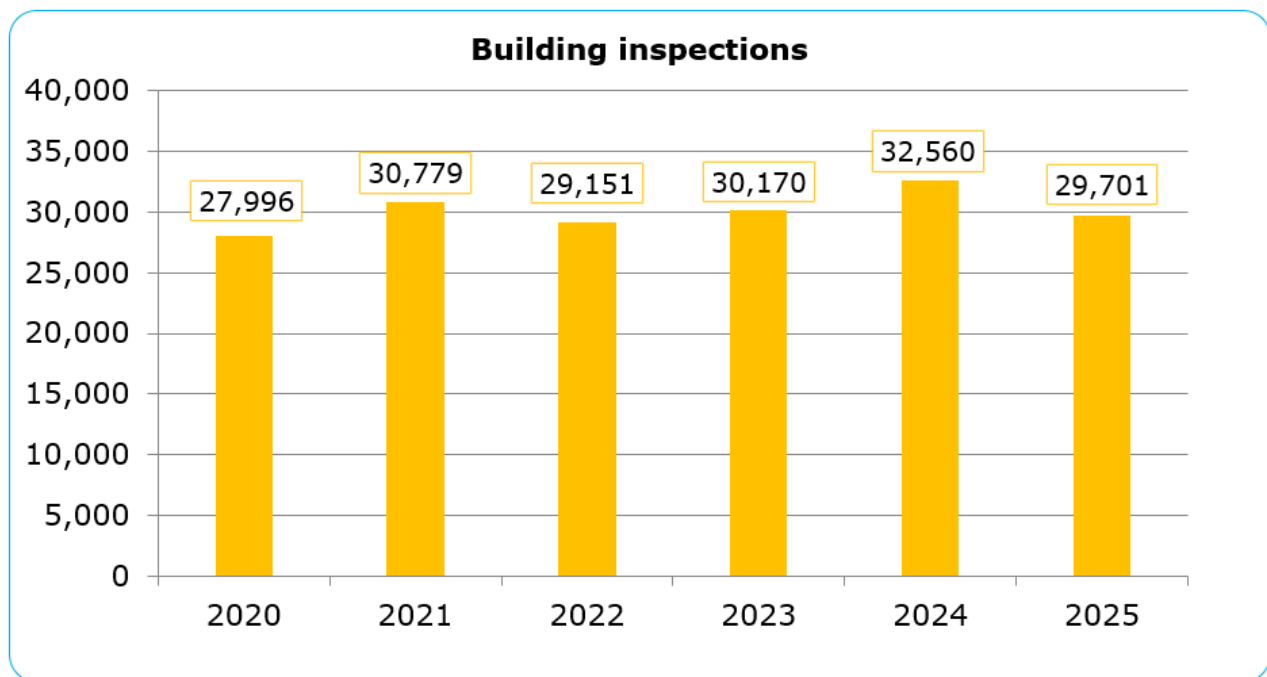


Once permits are issued, inspections play a critical role in ensuring that construction activities conform to approved plans and applicable standards. Permit holders or their contractors are responsible for scheduling all mandatory inspections through GPAS. The Ontario Building Code requires that inspections be conducted within 48 hours of a valid request; however, Building Services' has established a service level whereby inspection requests scheduled by 3:00 p.m. are typically completed on the next business day. This practice supports timely service delivery and helps ensure compliance with legislated inspection timelines. Inspectors evaluate work at prescribed stages and document compliance or identify

infractions, which must be corrected and re-inspected before the overall permit is considered complete. Failure to schedule or pass inspections may result in enforcement actions or delays in project progression.

The Inspection Services team is responsible for all construction and demolition inspection related activity regulated by the OBC. In addition to inspecting the construction of buildings, demolition projects, Inspection Services is responsible for plumbing, HVAC and energy efficiency inspections. Inspection Services also carries out swimming pool, hot tub, liquor license, daycare, and business license inspections, as well as other miscellaneous property inspections such as investigating construction without a permit, grow operations and buildings damaged by fire.

Chart 3: Building Inspections by year



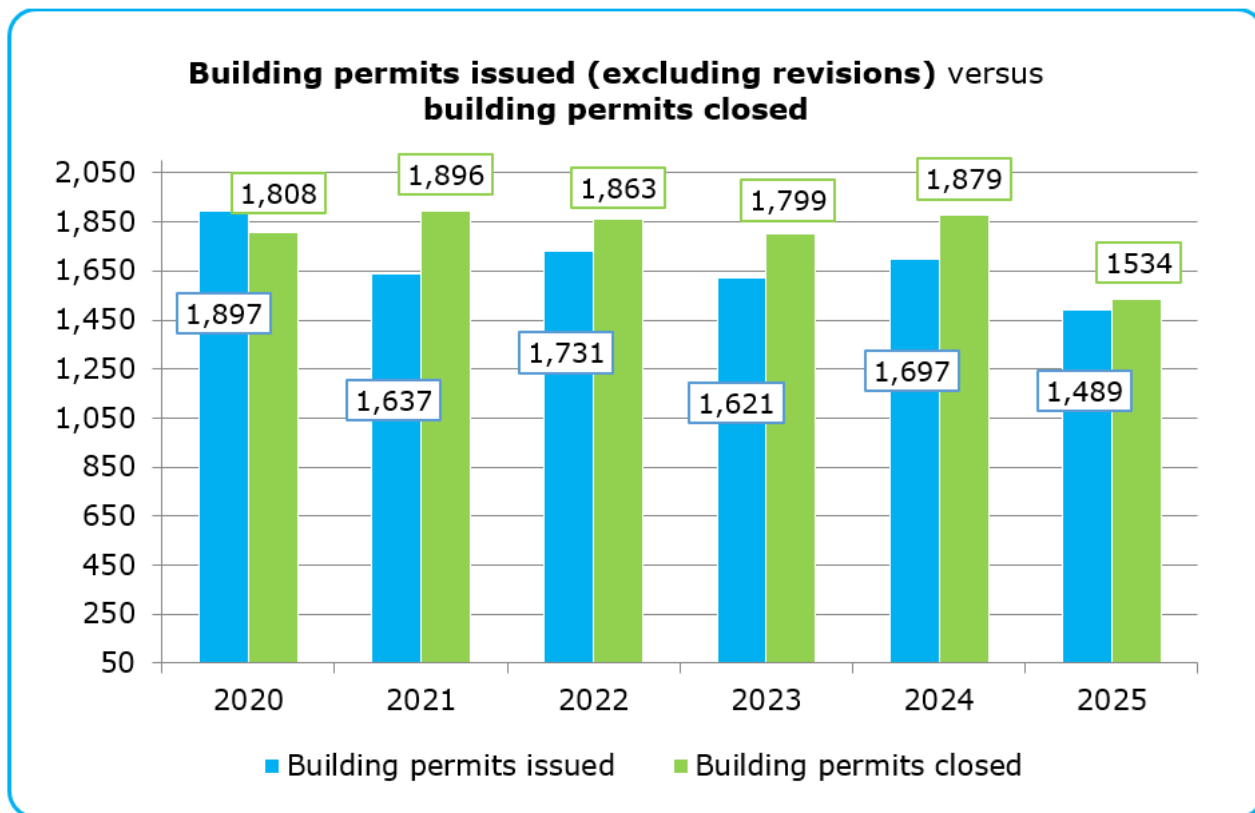
Building Services also supports transparency and accountability through mechanisms such as public permit status searches and records requests under the Municipal Freedom of Information and Protection of Privacy Act. Members of the public and property owners can access detailed permit histories, inspection outcomes, and construction documentation for permitted projects, subject to privacy restrictions and applicable fees. This access helps inform community stakeholders and supports responsiveness to inquiries about development activity within the city.

The volume and value of building permit activity in Guelph remain significant contributors to municipal growth planning and economic development. This growth underscores the importance of an efficient and effective permit and inspection regime, both to support development objectives and to mitigate risks associated with construction quality, safety, and code compliance.

As part of the Inactive Permits Program, the Inspection Services team has a goal of closing at least as many building permits per year as are issued. The winter months are typically non-peak times for building inspections, which provides an opportunity

to follow-up on inactive permits. Efforts to close more permits than were issued in 2024 were successful. Over 180 more permits were closed than were issued in 2024. This can be attributed to the additional effort put in by the inspection team members to address inactive building permits during off-peak months and the additional efforts of administrative staff to support this effort.

Chart 4: Building Permits Issued versus Building Permits Closed by year



A comparative analysis of building permit fees was undertaken to benchmark the City of Guelph against selected peer municipalities. The purpose of this comparison is to benchmark Guelph’s 2025 permit fee structure against peer municipalities with similar service profiles and growth pressures, specifically Kitchener, Waterloo, Cambridge, Burlington, and Barrie. The table below focuses on two common residential permit types: Deck permits and Basement unit permits (based on a 700 sq. ft. finished area within an existing dwelling). This analysis is intended to provide context regarding the relative positioning of Guelph’s permit fees and to support an assessment of reasonableness and competitiveness.

Table 1: Building Permit Fee Comparison

Municipality	Deck Permit Fee	Basement Unit Permit Fee (700 sq. ft.)	Notes / Fee Structure Characteristics
Guelph	\$130	\$390	\$0.53/Per ft <sup>2</sup> .
Kitchener	\$95	\$259	\$0.37/Per ft <sup>2</sup> .

<b>Waterloo</b>	\$118	\$385	\$0.55/Per ft <sup>2</sup> .
<b>Cambridge</b>	\$140	\$364	\$0.52/Per ft <sup>2</sup> .
<b>Burlington</b>	\$377	\$537	\$8.25/Per m <sup>2</sup> (\$0.77/Per ft <sup>2</sup> ).
<b>Barrie</b>	\$178	\$529	\$7.83/Per m <sup>2</sup> (\$0.73/Per ft <sup>2</sup> ). \$529 includes \$20 Pre-screening fee.

\*In addition to the building permit fees shown above, the following municipalities also apply a separate accessory dwelling unit (ADU) registration fee. ADU registration fees are not part of the Ontario Building Code (OBC) prescribed permit fee framework and are considered non-tax fees. As such, they are administered separately from building permit fees and are not directly comparable across municipalities:

Guelph \$160

Kitchener \$250

Waterloo \$314

Building Services utilizes comprehensive customer satisfaction surveys approximately every five years to identify trends, recurring issues, or potential service gaps that inform operational improvements and risk mitigation strategies. The most recent survey was completed in 2022, and based on its findings, the Department developed a six-point plan to enhance customer service and streamline the permit and inspection experience. Many of these initiatives have already been implemented, and the remaining items are actively in progress. The plan includes more proactive, non-technical outreach to customers at key points in the permit and zoning process, introduction of scheduled inspections supported by mobile tools and revised staff responsibilities. The department also offers preliminary pre-consultation discussions for select projects, expanded pre-permit inspections, and provides enhanced live assistance, both in person and virtually for customers navigating applications or booking inspections. Additional initiatives include developing tailored customer service and technical communication training, and incorporating diversity, inclusion, and corporate service standards into all improvements.

The Building Services division has initiated a comprehensive Building Permit Fee Study to address the growing structural imbalance between annual permit revenues and operating expenditures. Recent declines in high-rise residential and large Industrial, Commercial, and Institutional (ICI) permit activity - historically representing 30-50% of annual revenue despite comprising less than 1% of permit volume have accelerated the drawdown of the OBC Stabilization Reserve. As of year-end 2023, the reserve stood at approximately \$5.8 million (147% of operating expenditures), but significant withdrawals of \$1.9 million in 2024 and \$2.3 million in 2025 have reduced the balance to just over \$1 million. Without corrective action, the City anticipates a further \$1.66 million deficit in 2026, requiring approximately \$660,000 in interfund borrowing to maintain operations. Recognizing the unsustainability of this trajectory, Building Services is proactively

undertaking a full fee structure review to realign revenues with the true cost of service delivery.

To support this work, the City has engaged external consultants with extensive experience conducting building permit fee reviews across Ontario and Canada. The study guided by the City's Terms of Reference includes a detailed analysis of historical permit activity, cost structures, reserve trends, and comparator municipal practices. The methodology incorporates activity-based costing, process mapping, benchmarking, and revenue forecasting to identify opportunities for new fees, revised fee structures, and improved equity across permit types. The study will also evaluate reserve fund targets, repayment strategies for interfund borrowing, and phased implementation options to mitigate impacts on stakeholders. This initiative represents a significant step toward stabilizing the Building Services financial model, diversifying revenue sources, and reducing reliance on large-scale development activity to fund core operations.

Given the centrality of building permit approvals and inspections to public safety, urban development, compliance oversight, and economic activity, continuous performance monitoring and value-for-money evaluation of these processes supports informed decision-making by Council, senior management, and operational leadership. This audit, commissioned as part of the City's 2025 internal audit work plan, aims to examine the design and operational effectiveness of key controls across the permit lifecycle, identify opportunities to enhance service delivery, and assess alignment with legislative and policy requirements. The background provided herein establishes the context for the audit's objectives, scope, and methodology.

### **Audit Objectives and Scope**

The primary objective of this Value-for-Money audit was to assess whether the City of Guelph's Building Permit Approvals and Inspections program is operating in an economical, efficient, and effective manner while complying with applicable legislative, regulatory, and municipal policy requirements. In particular, the audit sought to determine whether:

- Building permit applications are processed and approved in a timely manner consistent with legislated service standards and City-established targets.
- Inspection activities are appropriately planned, scheduled, conducted, and documented to ensure compliance with approved plans and applicable building codes.
- Resources (financial, human, and technological) are utilized efficiently and aligned with program demand and risk.
- Key internal controls over permit intake, plan review, inspections, enforcement, and record-keeping are appropriately designed and operating effectively.
- Performance monitoring, reporting, and management oversight support continuous improvement and accountability.
- Opportunities exist to improve service delivery, reduce processing delays, enhance client experience, and strengthen operational resilience.

The scope of the audit included the end-to-end building permit lifecycle, from application intake through permit issuance, inspections, and permit close-out, for both residential and non-residential (Industrial, Commercial, and Institutional - ICI) projects. Specifically, the audit scope encompassed:

- Governance and oversight structures related to Building Services operations.
- Permit intake and application completeness review processes.
- Permit issuance processes and communication with applicants.
- Inspection scheduling, execution, documentation, and follow-up.
- Enforcement and compliance activities, where applicable.
- Use of information systems supporting permit and inspection activities.
- Performance measurement, reporting, and management review practices.
- Staffing models, workload allocation, and resource planning related to the program.

The audit primarily focused on activities undertaken during 2025. Financial statement auditing, zoning approvals, and planning policy decisions were excluded from scope.

### **Audit Approach and Methodology**

To achieve the audit objectives, a risk-based and evidence-driven approach was applied, incorporating the following procedures:

#### **Planning and Risk Assessment**

- Reviewed relevant legislation, including the Ontario Building Code Act and associated regulations.
- Examined City policies, procedures, service standards, and internal guidelines governing building permits and inspections.
- Conducted a preliminary risk assessment to identify key operational, compliance, and service delivery risks.

#### **Document and Data Review**

- Analyzed permit and inspection process documentation, workflow guides, and standard operating procedures.
- Reviewed available performance data, service level targets, and management reports.
- Examined selected permit and inspection files to assess consistency, completeness, and timeliness.

#### **Interviews and Process Walkthroughs**

- Conducted interviews with management and staff within Building Services and related departments.
- Performed walkthroughs of key processes.

#### **Comparative and Leading Practice Analysis**

- Considered leading practices from comparable Ontario municipalities.
- Assessed alignment with recognized best practices in digital permitting, inspection management, and performance reporting.

#### **Analysis and Reporting**

- Evaluated the effectiveness of key controls and processes against established criteria.
- Identified areas of strength, gaps, and opportunities for improvement.
- Developed practical, actionable recommendations aimed at enhancing value for money.

## **Detailed Findings and Recommendations:**

### **Observation #1**

#### **Complaints Management Process**

The Building Permit Approvals and Inspections program is a high-volume, public-facing regulatory service. Staff regularly receive contacts from applicants and members of the public that are often informally characterized as “complaints,” but which vary significantly in nature, risk, and complexity. These generally fall into the following categories:

- General inquiries, including requests for permit status updates, clarification of next steps, or Ontario Building Code requirements.
- Concerns arising from misunderstandings of legislated timelines, service standards, or workload impacts, where applicants believe standards are not being met. In some cases, these matters are escalated to senior management, the Mayor, or Members of Council.
- Objections to regulatory requirements, particularly those related to compliance with the Ontario Building Code, including concerns regarding cost or perceived complexity. These matters may also be escalated by applicants, owners, contractors, or other permit participants.

Formal complaints involving allegations relating to staff conduct are managed in accordance with the legislative framework and accountability requirements of the Building Code Act, 1992. These complaints are investigated, documented, and retained centrally for Building Services management oversight.

Below mechanisms are currently in place to support the handling and documentation of concerns:

- Staff record key issues and decisions in Automated Mapping and Data Analysis (AMANDA) system at the permit level when appropriate, preserving context without documenting every interaction, though management sees value in clearer procedures for intake, documentation, escalation, and closure.
- Escalated matters involving senior leadership or Council are addressed promptly, typically through email by Chief Building Official or managers.

While management and staff within the Building Permit Approvals and Inspections program respond to public and applicant complaints as they arise and provide follow-up to both complainants and senior leadership, the audit noted that there is no centralized or formal mechanism to consistently record and track complaints. Specifically, there is no consolidated log or system to document the nature of complaints received, actions taken, response and resolution timelines, escalation activities, or outcomes, including instances of informal or immediate resolution.

The absence of a centralized complaint tracking tool limits the department’s ability to demonstrate that all complaints are being captured, handled consistently, and resolved within an appropriate timeframe. Without a complete and auditable record, management cannot readily assess compliance with internal service standards, monitor response performance, or provide comprehensive reporting to senior leadership or Council. In addition, the lack of consolidated complaint data restricts the department’s ability to identify trends, recurring issues, or potential service gaps that could inform operational improvements and risk mitigation strategies.

From a governance and internal control perspective, the current complaints handling approach is not sufficiently formalized to support accountability, transparency, and continuous improvement within a high-volume, public-facing regulatory program.

Recommendation #1

It is recommended that Building Services implement a centralized complaints tracking mechanism for the Building Permit Approvals and Inspections program. Not all concerns require formal tracking and a proportional, risk-based approach is more appropriate. At a minimum, the tool or log should capture:

- Date the complaint was received
- Source and nature of the complaint
- Service area or process impacted
- Actions taken and responsible staff
- Response and resolution timelines
- Outcome and resolution status
- Escalation and management review, where applicable

Management should also establish clear procedures for complaint intake, documentation, escalation, and closure, including defined service standards for response and resolution. Regular summary reporting should be provided to senior management to support oversight, trend analysis, and continuous service improvement, and to enable more transparent reporting to Council, where appropriate.

In considering options for strengthening complaints handling, it would be beneficial for the City to explore an enterprise-wide approach to complaint intake, tracking, and resolution. A corporate framework or tool applied proportionally and based on risk would support consistency across departments while reducing duplication of effort. Such an approach would also allow Building Services to align with broader organizational practices rather than developing a standalone solution. The timing and method of implementation should remain at management’s discretion, recognizing that budget, capacity, and resourcing will determine when an enterprise tool can be evaluated, selected, and deployed.

Table 2: Centralized complaints tracking and reporting process

	<b>Department / Division</b>	<b>Action Plan</b> (Include agree or disagree, if agree explain briefly method of implementation)	<b>Target Completion Date</b>
1	Building Services	Agree: Management will implement a risk-based approach to complaint handling by categorizing and prioritizing concerns based on their nature, impact, and escalation risk. Clear procedures will be developed for intake, documentation,	Phase 1 – Set up basic tracking in Excel. 1 to 3 months.  Phase 2 – Investigate and implement

		<p>escalation, and closure, including defined service standards. Management will also determine which concerns require formal documentation, the appropriate level of detail, and the proper system for storage, while avoiding duplication across platforms.</p>	<p>advanced complaint management programming 3 to 12 months, depending on IT support and program availability as well as considering any enterprise level approach.</p>
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**Observation #2**

**Performance Reporting to Council and Executive Team**

Historically, Building Services performance and activity information was reported directly to Council through an annual report and presentation. This approach later transitioned to providing the information through an Information Report to Council. Subsequently, a decision was made corporately to discontinue the Information Report format and instead incorporate Building Services information, when requested, into broader corporate reports to Council.

The audit noted that the Building Services produces robust key performance indicator (KPI) data and detailed statistical reporting to monitor operational performance. This includes permit turnaround time metrics showing the percentage of permits reviewed within provincially mandated timelines (10-day, 15-day, 20-day, and 30-day categories), as well as median processing times and internal performance targets. These KPIs are documented through internal permit turnaround time target reports and the annually produced Building Services Statistical Report, which contains extensive operational, workload, and performance information across permits, inspections, zoning, and related programs.

The audit noted that although the KPIs and statistical results are comprehensive and support internal oversight, they are not regularly reported to Council or formally shared with the Executive Team. The annual statistical report is circulated only within the department and is not incorporated into corporate performance reporting or presented to Council, even though it remains publicly accessible online through the Building Services Statistical Report.

As a result, Council and senior leadership do not have regular visibility into how well the Building Permit Approvals and Inspections program is performing against legislated service standards, internal targets, and workload pressures. The absence of external reporting limits transparency and reduces the City’s ability to demonstrate accountability for a critical, public facing regulatory service. Additionally, without formal reporting, opportunities to contextualize performance challenges such as staffing vacancies, recruitment difficulties, or increased permit complexity are not consistently communicated to decision makers.

Building Services is already advancing work to enhance public transparency through the development of an online dashboard that will display key performance metrics and service indicators. This initiative, combined with the City’s existing Strategic Plan KPI reporting framework, provides multiple pathways for sharing operational data with Council and the public. It is anticipated that the dashboard could be available in 2027. As these tools mature, they will collectively strengthen visibility into program performance, support informed decision-making, and reinforce confidence in the efficiency and effectiveness of the Building Permit Approvals and Inspections program.

Recommendation #2

It is recommended that management establish a formal performance reporting mechanism to regularly report key Building Permit Approvals and Inspections KPIs to the Executive Team and Council. Executive Team should be provided the opportunity to review this approach, and in the absence of any objection, the reporting approach will be considered accepted as aligned with the City’s corporate reporting direction.

At a minimum, reporting should include:

- Permit turnaround time performance (10-day, 15-day, 20-day, and 30-day permits), including percentage within target and median review times
- Inspection service level performance
- Permit volumes, construction values, and workload trends
- Key risks, capacity challenges, and notable variances from targets

Management should consider leveraging the existing Building Services Statistical Report by presenting a summarized version annually to Council, supported by periodic (e.g., quarterly or semi-annual) KPI updates to senior leadership. Formalizing this reporting would enhance transparency, strengthen accountability, support informed resource and policy decisions, and demonstrate how effectively the program is being managed in accordance with legislative requirements and Council expectations.

Table 3: Enhancement of Performance Measurement Reporting to Executive Team and Council

	<b>Department / Division</b>	<b>Action Plan</b> (Include agree or disagree, if agree explain briefly method of implementation)	<b>Target Completion Date</b>
1	Building Services	Agree: Management acknowledge that there is an opportunity for Building Services to work with Corporate Communications and the Executive Team to more clearly highlight and promote performance and statistical information to Council. We also agree to an annual Council information report to highlight the	ET Briefing Note with proposed approach to be provided to ET within 3 months, for their consideration.

		achievements of the building department.	
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### **Financial Implications**

The audit recommendations are expected to strengthen the control environment within the Building Services department. Management has noted that implementation may require additional resources, and no specific funding or staffing has been identified at this time. Certain recommendations are also dependent on Information Technology support, which is subject to existing multi-year project plans and competing corporate priorities. As a result, implementation timelines may be influenced by resource availability and corporate capacity.

### **Consultations and Engagement**

Findings and recommendations have been discussed and reviewed with the Executive Team.

### **Attachments**

None.

### **Departmental Approval**

None.

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