

Police Governance and Human Rights: A Policy Review for the Peel Police Service Board

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Last updated:

October 21, 2024

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Executive summary

Human rights-centered policing prioritizes the safeguarding and advancement of human rights across all aspects of the policing profession. Human rights are a set of fundamental entitlements that belong to all people, and the police play a crucial role in safeguarding and advancing these rights through enforcing laws, preventing abuses, and promoting respect for human dignity.

We conducted a review of academic literature on the intersection of policing and human rights. The literature review played a pivotal role in informing the development of the framework used to evaluate the Peel Police Service Board's (PPSB) governance policies to support the ongoing efforts of the Board's Governance and Human Rights Committee. By synthesizing key themes from academic research, we were able to create a comprehensive tool to assess the alignment of the PPSB's governance policies with human rights principles. Where gaps were identified or improvements could be made, we make concrete recommendations.

The following themes emerged from our literature review, which we elaborate on in the first part of the report.

- **Public safety:** Human rights-centered policing is effective policing. It is likely to increase social order in a community, as effective policing requires legitimacy, and police legitimacy increases with respect for human rights.
- **Twin duties:** The police have a complex relationship with human rights, as they have both the power to protect and promote them, as well as to undermine and violate them. While much attention has been given to the negative role of police in relation to human rights, there is a growing recognition of the potential positive role that police can play in promoting and protecting human rights as well.
- **Use of force:** The principles of legality, necessity, proportionality, accountability, and non-discrimination define the constraints on police use of force. However, research shows that major urban police services in many countries do not fully comply with these principles.
- **Police work:** Human rights reform in policing raises difficult questions about what the proper role and function of the police ought to be in the 21st century. There is a risk that human rights could be used to expand police functions because the desire to better protect human rights and enforce the rule of law could lead police to enter

spaces where they have previously been absent, potentially criminalizing or bringing new populations into contact with the criminal justice system.

- **Accountability:** Police services need to act within the framework of international, national, and regional human rights laws and standards, and to be answerable for their actions to the communities they serve.
- **Human rights culture:** A human rights culture in policing is one that promotes and upholds human rights values, principles, and standards in all aspects of policing. It involves embedding human rights into the policies, practices, and attitudes of police organizations and ensuring that human rights are at the core of their work.
- **Substantive vs symbolic change:** Organizational change needs to be substantive and meaningful. Substantive change involves addressing the root causes of systemic issues, implementing concrete policy changes, and holding individuals accountable for their actions. When change is purely performative or symbolic it risks creating the illusion of progress without addressing the issues.
- **Recruitment and training:** Recruitment and training are key to cultivating a culture of respect for human rights in policing. Recruitment should involve testing and evaluating officers based on clear, measurable objectives, including their views on key elements of human rights. Training should be ongoing, targeting areas like de-escalation, procedural justice, and trauma-informed communication, and officers should be regularly tested to ensure they have internalized and understood what they have learned.
- **Measurement and evaluation:** Systematic measurement and evaluation are crucial for assessing the success and progress of human rights reform in policing. However, current methods for measuring police success, such as arrest and conviction rates, may not accurately reflect the impact of policing on human rights. There is a need to rethink and develop new methods for measuring success that are aligned with human rights principles.
- **Strategic planning:** Human rights reform in policing requires careful strategic planning to ensure that reforms are evidence-based, targeted, and effectively implemented. Strategic planning involves identifying priority areas for reform, setting measurable goals, and establishing timelines for implementation and evaluation.

While the academic literature on policing and human rights provides a wealth of knowledge on the critical issues that need to be addressed in policing, it offers less explicit guidance on the role of police board governance in advancing human rights in policing.

Police boards have a crucial role to play in advancing these different areas of human rights reform by overseeing and guiding the service's practices and policies to ensure that they are aligned with human rights standards and principles.

To assess the extent to which the Peel Police Service Board's (PPSB) governance policies reflect and incorporate key human rights considerations, we undertook a comprehensive policy review. Our review was guided by a set of specifically designed questions drawn from the literature along the following dimensions:

- Statement of Commitment
- Conformity with relevant laws and policies
- Non-discrimination and Equal Treatment
- Transparency
- Accountability
- Measurement and Evaluation
- Training and Education
- Community Engagement
- Strategy
- Definitions
- Language and Accessibility
- Unintended Consequences

This report should be considered within the context of the PRP and PPSB's broader commitment to reform as part of the Human Rights Project. In October 2020, the Peel Regional Police (PRP) and its Board (PPSB) voluntarily entered a Memorandum of Understanding (MOU) with the Ontario Human Rights Commission (OHRC). The MOU commits the PRP and PPSB to creating and implementing legally binding measures aimed at addressing and eliminating systemic racism in policing, improving transparency and accountability, and strengthening trust between the police and Black, Indigenous, and other racialized communities in Peel Region (for more background on the PRP, PPSB, and OHRC's Human Rights Project and MOU, see Appendix B).

In total, 51 Board governance policies and 91 recommendations were advanced.

PART II:
A BRIEF INTRODUCTION TO HUMAN RIGHTS

Part I: A Brief Introduction to Human Rights

Human rights are a set of universal, inalienable, and interdependent rights that are entitled to all human beings, regardless of race, gender, religion, or any other status. These rights are meant to ensure that every individual can live a life of dignity and equality, free from discrimination and abuse. The concept of human rights has a long history and has evolved over time to reflect changing societal values and beliefs. The development of international human rights instruments, as well as country-specific mechanisms such as the Canadian Human Rights Act or Ontario's Human Rights Code, have helped to ensure that these rights are protected and upheld in Canada and around the world.

At the international level, human rights are enshrined in several key instruments, including the Universal Declaration of Human Rights, adopted by the United Nations General Assembly in 1948. This document lays out a comprehensive framework for human rights, including the right to life, liberty, and security of person; freedom from torture and slavery; freedom of thought, conscience, and religion; and the right to participate in government, among others. Other important international human rights instruments include the International Covenant on Civil and Political Rights, and the International Covenant on Economic, Social and Cultural Rights, which provide a more detailed framework for the implementation of human rights.

Human rights are founded on several core principles, including:

- **Universalism:** Human rights are considered universal, meaning that they apply to all human beings regardless of race, gender, religion, or any other status.
- **Inalienability:** Human rights cannot be taken away or denied to any individual. They are considered inherent to every human being and cannot be transferred or given up.
- **Interdependence:** Human rights are interdependent, meaning that the enjoyment of one right is often dependent on the enjoyment of others.
- **Non-discrimination:** All individuals should be treated equally and without discrimination, regardless of their race, ethnicity, gender, religion, sexual orientation, or any other status.
- **Indivisibility:** Human rights are indivisible, meaning that all human rights are equally important. Some human rights cannot be prioritized over others. Other legal rights cannot be prioritized over human rights.

- **Accountability:** Governmental and other actors are accountable for the protection and promotion of human rights and must be held accountable if and when violations of these rights occur.
- **Progressiveness:** Human rights are considered a dynamic concept that evolves over time to reflect changing societal values and beliefs.

These principles form the cornerstone of the human rights framework, providing a foundation for the protection and promotion of these rights worldwide.

In Canada, the protection and promotion of human rights is governed by both federal and provincial laws. For example, the Canadian Charter of Rights and Freedoms is a key piece of legislation that outlines the fundamental rights and freedoms of Canadian citizens, including freedom of speech, equality before the law, and the right to life, liberty, and security of person. In addition, provinces such as Ontario have established their own human rights laws like the Ontario Human Rights Code. Provinces like Ontario have also established human rights commissions, such as the Ontario Human Rights Commission, to investigate and address discrimination and human rights violations under provincial law. These institutions play a critical role in promoting and protecting human rights in Canada and serve as an important resource for those who have experienced discrimination or violations of their rights.

The Ontario Human Rights Code, which consolidated numerous discrimination laws and added extra safeguards, was established in Ontario in 1962 and has undergone several amendments since, with the most recent taking place in December 2006. The Code sets out the responsibilities of public and private employers and organizations to ensure that they do not discriminate against individuals based on protected grounds such as race, gender, sexual orientation, age, and disability, among others. The Ontario Human Rights Code also provides for the establishment of the Ontario Human Rights Commission, which has the responsibility of promoting, protecting, and advancing human rights in Ontario. The Commission investigates complaints of discrimination and harassment, provides public education and training, and develops policies and guidelines to prevent discrimination and promote human rights. The Ontario Human Rights Code is founded on three guiding principles:

- **Dignity and Worth of Every Person:** This principle asserts that every person is entitled to respect and recognition of their inherent dignity and worth. Every person should be treated with respect and not be subject to discrimination or harassment

based on their personal characteristics, such as their race, gender, religion, sexual orientation, age, or disability.

- **Understanding and Mutual Respect:** This principle emphasizes the importance of understanding and respect for differences among people. It means that people should strive to understand each other and recognize that different perspectives and experiences can contribute to a rich and diverse community.
- **Equal Opportunity to Participate and Contribute Fully to the Community:** This principle recognizes that all individuals have the right to participate fully in the community, regardless of their personal characteristics. It means that people should have equal access to employment, education, housing, and other opportunities to contribute to society. This principle promotes the idea that diversity is a strength.

Ensuring that these core principles of human rights are respected and upheld in practice is an ongoing project and one that, as we get into in the next section, police services and their governing boards must adopt an active role.

**PART II:
HUMAN RIGHTS IN POLICING**

Part II: Human Rights in Policing

Human rights-centered (HRC) policing is an approach to law enforcement that prioritizes the protection and promotion of human rights in all aspects of policing. It involves treating individuals with dignity and respect, and recognizing and upholding their fundamental human rights, including the right to life, liberty, and security of the person. HRC policing emphasizes the importance of community engagement and building trust between the police and the communities they serve. It involves working collaboratively with community members to identify and address issues of concern, and to develop solutions that are respectful of human rights. HRC policing involves promoting transparency and accountability within policing and ensuring that officers are adequately trained in human rights principles and standards.

Human rights are not “incompatible with the process of policing”.¹ HRC policing aims to shift policing, through careful and evidence-based reform, toward “more humane, just, rights-observant practice”.² It is about making human rights “a more visible core value in modern-day policing”.³ From the perspective of HRC policing, policing is fundamentally about the “allocation of human rights”.⁴ In countries like Canada, the state has a fundamental duty to protect and promote human rights and the police play a core part in this. At the same time, we must remember that HRC policing is not going to solve every issue in policing on its own. “[I]t is important to ensure that human rights do not acquire the status of a ‘magic bullet’ when it comes to debates about the future of policing”.⁵

Policing has changed immensely over the last century and many developments have occurred over this period that align with the goal of creating a human rights-oriented police service. For example, policing in Canada has become much more rights-focused in recent decades, many tangible improvements to police transparency have occurred in the contexts of governance, oversight, and decision-making, and community engagement is increasingly a staple of good policing. Although many of these progressive changes preceded the human rights agenda in policing, they are in direct support of it.⁶

¹ Ralph Crawshaw et al., *Human Rights and Policing*, 2nd rev. ed, The Raoul Wallenberg Institute Professional Guides to Human Rights, v. 5 (Leiden, The Netherlands; Boston, Mass: Martinus Nijhoff, 2007), 24.

² David Bayley, “Human Rights in Policing: A Global Assessment,” *Policing and Society* 25, no. 5 (September 3, 2015): 541, <https://doi.org/10.1080/10439463.2014.895352>.

³ Jack R. Greene, “Policing through Human Rights,” *Ideas in American Policing* 13 (2010): 18.

⁴ Greene, 5.

⁵ Benjamin Goold, “Policing and Human Rights,” in *The SAGE Handbook of Global Policing*, ed. Ben Bradford et al. (SAGE, 2016), 236.

⁶ Greene, “Policing through Human Rights,” 11.

In general, there is very little empirical research into policing and human rights and even less focused on democratic countries like Canada. As one prominent Canadian policing researcher reflects in his review of existing research on policing and human rights in global context: “[T]here are very few empirical studies that focus specifically on the question of policing and rights, or the barriers to effective human rights policing. As a result, we know little about how the police understand human rights, how the police’s institutional and working cultures shape individual’s responses to those rights, and how human rights training for police officers may affect policing outcomes”.⁷ We would add that even less is known about policing and human rights as it regards matters of board governance.

To be sure, plenty of research has been conducted in policing studies over the past several decades with implications for policing and human rights. It simply did not use the language of human rights. Harmful practices like false arrest, racial profiling, corruption, and excessive force have been a focus in policing studies since the 1960s and 70s, but it is only recently that researchers have begun to engage with the language of human rights specifically.⁸ As the movement toward HRC policing takes hold, it is becoming “nearly impossible to think of policing without human rights”.⁹

Much of the existing literature on policing and human rights focuses on summarizing key international laws and policy instruments like the Universal Declaration of Human Rights (UDHR) and their implications for policing reform. The UDHR is the normative source of hundreds of human rights instruments around the world. Ratified by the UN General Assembly in 1948, it gave life to a “proliferation of new constitutions that include judicially enforceable bills of rights in post-colonial societies and established democracies”.¹⁰ It also set in motion a new whole complex of major training events beginning with the UN Division of Human Rights’ 1963 conference in Canberra on the “Role of the Police in the Protection of Human Rights”.¹¹

The UDHR was a direct inspiration for the national and regional level human rights regimes that we have today in Canada, which includes major laws like the Ontario Human Rights Code and institutional actors like the Ontario Human Rights Commission. The

⁷ Goold, “Policing and Human Rights,” 236.

⁸ Julia Hornberger, “Human Rights and Policing: Exigency or Incongruence?,” *Annual Review of Law and Social Science* 6 (2010): 260.

⁹ Hornberger, 266.

¹⁰ Richard Martin, *Policing Human Rights: Law, Narratives and Practice*, First edition, Clarendon Studies in Criminology (Oxford: Oxford University Press, 2021), 5.

¹¹ Martin, 6–7.

UDHR initiated a global revolution in human rights focused reform and continues to have a lasting impact on how we understand the duties and responsibilities of state actors like the police. In countries like Canada, there is now a general expectation that state agencies like the police are going to protect and promote human rights “even if that means constraining their own ability to pursue key policies or act in individual cases”.¹²

While hugely important, the fact that so much of the existing literature on policing and human rights in academia is focused on international instruments like the UDHR is also a limitation. This is particularly true when dealing with policing and human rights in contexts like Canada. The objective of existing texts focused on international instruments like UDHR is primarily to provide high-level guidance to those working in countries undergoing democratic transitions seeking to advance a more human rights respecting system of law enforcement.¹³ These texts are primarily aimed at those working in post-authoritarian regimes, often in the context of the Global South. The emphasis tends to be on things like the need for proportionate uses of force and the humane treatment of subjects during interrogative interviewing and detainment. These are an important part of HRC policing, but they are not the whole story, nor are they necessarily the most important considerations in countries like Canada where egregious practices like torture of citizens by police are uncommon.

A broader perspective on human rights and policing is beginning to take shape, though it is still very much in the early stages. There are a “wide array of actions and decisions made by the police that significantly impact human rights. Considering the many ways that the police intervene in social affairs provides an opportunity to better understand how policing through a human rights framework might take shape”.¹⁴ This means paying crucial attention to police actions like the decision to arrest, use force, detain, stop and search, seize property, or charge, while also looking beyond these traditional crime-fighting practices and toward the many other aspects of policing that comprise day-to-day work, such as responding to emergency situations such as car accidents, medical emergencies, or natural disasters, engaging in community outreach, participating in public events, enforcing traffic laws, and responding to noise complaints and other nuisances. **In an influential book on policing and human rights, Neyroud and Beckley identify six ways policing and human rights intersect: use of police powers, use of force,**

¹² Goold, “Policing and Human Rights,” 227.

¹³ Graham Ellison, “Human Rights Policing,” in *The Sage Dictionary of Policing* (SAGE, 2009), 160–63; James Sheptycki, “Policing and Human Rights: An Introduction,” *Policing and Society* 10, no. 1 (April 2000): 1–10, <https://doi.org/10.1080/10439463.2000.9964828>; Hornberger, “Human Rights and Policing.”

¹⁴ Greene, “Policing through Human Rights,” 5.

decision making, duty of care, the rules of natural justice, and accountability.¹⁵ This last one is especially important from a governance perspective: adopting a broader, more comprehensive perspective on policing and human rights means looking beyond the police itself and toward other police adjacent institutions including oversight bodies and the governing board, whose work plays an equally important role in the advancement of policing and human rights.

Below we provide a discussion of the major themes that emerged from our review of existing academic literature on policing and human rights.

Public Safety

From a public safety standpoint, HRC policing is likely to bring more social order to the community, not less.¹⁶ HRC policing is effective policing. In a democratic country like Canada, police authority is drawn largely from the community rather than the state. The police get their formal powers from the state, but these powers can only be exercised effectively when viewed legitimately by those subject to them. When members of the community view the police as a legitimate source of authority, they are more likely to cooperate in investigations and accept outcomes (e.g., the decision to arrest) as fair and just. This proposition is backed by decades of rigorous empirical research in criminology.¹⁷ As one policing and international human rights expert puts it: **“The support of the community, essential to effective policing in a democracy, is dependent upon police respecting the rule of law, and respecting the human rights of groups and individuals within that community”**.¹⁸ Human rights require social order, understood as “tolerable levels of criminality and low levels of social tensions or civil unrest” in the community.¹⁹ Social order requires effective policing. Effective policing requires legitimacy. Legitimacy requires respect for human rights.

Twin Duties

¹⁵ Peter Neyroud and Alan Beckley, *Policing, Ethics and Human Rights* (Routledge, 2001), 68–69.

¹⁶ Bayley, “Human Rights in Policing,” 545.

¹⁷ Tom R. Tyler, *Why People Obey the Law* (Princeton University Press, 2006).

¹⁸ Crawshaw et al., *Human Rights and Policing*.

¹⁹ Crawshaw et al., 21.

The police have both a positive *and* negative relationship to human rights. In its “Fundamental Rights-Based Police Training” manual, the European Union Agency for Fundamental Rights refers to this as policing’s “twin duties”: “to refrain from actions that unduly interfere with human rights and to take all necessary and appropriate steps to protect those rights”.²⁰ For most policing scholars, this is an irresolvable tension, meaning it is something to be managed rather than overcome. As Goold writes, the police “can never escape this conflict, with the result that their capacity to protect rights will always, at some level, be in doubt”.²¹ Most academic writing on policing and human rights has focused on documenting and controlling the potential negative role of police on human rights. There is a growing recognition that more attention needs to be paid to the potentially positive role that police can play too. The “conditions under which policing actually contributes to human and civil rights” as a *positive force* is a more recent focus that one finds in current research on policing and human rights.²²

On the one hand, the police have the power to undermine human rights. On the other hand, they have the power to protect and promote human rights. When a police officer chooses to ignore or violate a human right or principle, they undermine and invalidate it. When a police officer chooses to uphold or defend a given human right or principle, they substantiate and reaffirm it. The police, as the first point of contact in the criminal justice system, wield a great deal of responsibility in this sense. The police are at the “forefront of securing, upholding, and reaffirming” people’s rights with every act or omission they make in the community.²³ Decisions to violate human rights can lead to a breakdown in trust between the police and the community, which can further undermine the protection and promotion of human rights.

Use of Force

While police use of force can be necessary to protect people from harm and uphold public safety, it also has the potential to undermine human rights if it is not used appropriately. Around the world, police use of force is increasingly understood to “fall squarely within

²⁰ European Union Agency for Fundamental Rights, ed., *Fundamental Rights-Based Police Training: A Manual for Police Trainers*, Training Manual (Luxembourg: Publications Office of the European Union, 2019), <https://doi.org/10.2811/395595>.

²¹ Goold, “Policing and Human Rights,” 233.

²² Greene, “Policing through Human Rights,” 11.

²³ Greene, 5.

the constraints set by the human rights system”.²⁴ At the highest level, these constraints are defined by various international sources aimed at restricting when and how police officers can use force against civilians. Key examples are the UN Code of Conduct for Law Enforcement Officials and the UN Basic Principles on the Use of Force and Firearms by Law Enforcement Officials. At the national and regional levels, limits on the use of force are typically operationalized through legislation, jurisprudence, executive decrees, administrative regulations and ordinances, and police department policies. **From a human rights perspective, police use of force must be used in accordance with the principles of legality, necessity, proportionality, accountability, and non-discrimination.**²⁵

- **Legality:** police must have a legal basis to use force, and their actions must be in line with the law.
- **Necessity:** the use of force must be necessary to achieve a legitimate objective, such as protecting public safety or apprehending a suspect. Police should use non-violent means whenever possible and should only use force when it is necessary to accomplish the objective.
- **Proportionality:** the use of force must be proportionate to the threat faced. Police must use only the amount of force necessary (i.e., non-excessive) to accomplish the objective.
- **Accountability:** police officers must be held accountable for their use of force. This includes both individual accountability for the actions of officers, as well as institutional accountability for the policies and procedures that govern police use of force.
- **Non-discrimination:** police must not discriminate based on race, ethnicity, religion, gender, or any other characteristic when using force. All individuals must be treated with respect and dignity, and police must avoid using force that is motivated by bias or prejudice.

In a global benchmarking study systematically evaluating the extent to which written directives in major urban police services in 29 countries complied with first four of these

²⁴ Claudia Flores et al., “Global Impunity: How Police Laws & Policies in the World’s Wealthiest Countries Fail International Human Rights Standards Special Issue: Police Discretion & Protecting Human Rights,” *Georgia Journal of International and Comparative Law* 49, no. 2 (2021): 247.

²⁵ Flores et al., “Global Impunity.”

international human rights standards, researchers found that “not one jurisdiction analyzed complied fully with the four principles of legality, necessity, proportionality, and accountability”.²⁶ In Canada, researchers assessed the written use of force directives of the Toronto Police Service, scoring it 6th (with a total score of 63/100) out of all cities reviewed after Jakarta, Lagos, Buenos Aires, Mexico City, and New York City.

Police Work

Some scholars argue for an expansion of the duties and responsibilities of the police with respect to human rights while others argue that the reach and presence of the police should be constrained from a human rights perspective, not increased.

Police work is primarily reactive, but it can also be preventative and rehabilitative. Proponents of expanding police presence in the community and in different criminal justice functions argue that we can think of policing as occurring at three levels of intervention -- preventative actions, reactive actions, and rehabilitative actions – with each level playing an important role in the protection and advancement of human rights.

- **Prevention:** This approach focuses on preventing crime from happening in the first place. It involves proactive measures such as patrolling high-crime areas, community policing, and implementing crime prevention programs. Preventative policing is aimed at deterring criminal behavior by creating a visible police presence and working with community members to identify and address potential sources of crime before they escalate.
- **Reaction:** This approach is focused on responding to crime after it has occurred. It involves traditional law enforcement activities such as responding to calls to service, conducting investigations, and making arrests. Reactive policing is aimed at apprehending perpetrators of crime and holding them accountable for their actions. This approach is more focused on punishment and retribution than prevention.
- **Rehabilitation:** This approach emphasizes the rehabilitation of people convicted of a crime to reduce the likelihood of reoffending. It involves working with victims, perpetrators, and the large community to address the root causes of crime, such as addiction, mental health issues, and poverty. Rehabilitative aims to provide people

²⁶ Flores et al., 259.

convicted of a crime with the resources and support they need to make positive changes in their lives and avoid future offending.

Some scholars emphasize the importance of all three of these levels of intervention for the advancement of human rights in policing. The argument is that we need police to engage preventative, reactive, and rehabilitative functions because each plays a unique role with respect to human rights. **Preventative actions secure human rights, reactive actions uphold human rights, rehabilitative actions reaffirm human rights.**²⁷

The police in most countries are primarily reactive in their day-to-day work. The police can uphold human rights in their reactive work by, for example, minimizing the use of force and only using force when necessary (as opposed to in all situations when it is legally justifiable). There are currently fewer opportunities for the police to secure and reaffirm human rights through prevention and rehabilitation. Preventative activities like community outreach and education are largely underfunded and underused by the police in most jurisdictions. These programs can play a crucial role in securing human rights by shaping how people view the police and its legitimacy.²⁸ Rehabilitation is not typically something that police play a major role in. In Canada, responsibility for rehabilitation typically falls on other agencies and organizations, such as probation and parole boards, social service agencies, mental health and addiction treatment providers, and educational institutions. Some researchers advocate for the police to play a greater role in such programs, albeit not in a leadership but in a “followership role, participating in social restoration but in a role... coordinated by others”.²⁹ It is emphasized by proponents of this view that before the police can play a more visible role in rehabilitation, they must carefully reflect on their identity, past and current practices, and relationship to the local community.³⁰

Other researchers writing on policing and human rights call into question whether the police ought to play more of a role in preventative and rehabilitative actions and suggest we should be concerned about further expanding police responsibilities when they may already reach too far. **As one researcher puts it, “a desire on the part of government or the public at large to better protect human rights and enforce the rule of law can, under certain circumstances, lead the police to enter into spaces where they have previously been absent, with the result that new populations are either criminalized**

²⁷ Greene, “Policing through Human Rights.”

²⁸ Greene, 9.

²⁹ Greene, 10.

³⁰ Greene, 10.

or brought within the ambit of state control”.³¹ Scholars against expanding the roles and responsibilities of the police do not deny the importance of preventative, reactive, and rehabilitative action as it regards human rights. Rather, they call into question what role the police specifically ought to play within each of these three levels of activity. It may be that police efforts are better focused on reacting to specific kinds of emergency incidents, whether through calls to service or via investigations, while other public organizations may be better positioned to serve other community needs, not only preventative and rehabilitative ones, but potentially some reactive as well (e.g., responding to calls about homelessness or mental health).

Arguments against further expanding the role of the police – in this case in the name of human rights – have gained a great deal of momentum in recent years, particularly since the rise of Black Lives Matter and increasingly mainstream calls to “defund and detask” the police. Those against expanding police roles and responsibilities in the name of human rights cite three major reasons for their concern:

- **Trust:** There is a well-documented lack of trust between the police and many communities in Canada, especially racialized and marginalized communities. Many communities do not trust law enforcement agencies like the police and for good reason. This lack of trust is inseparable from historical and systemic racism in policing and the broader criminal justice system and from longstanding historical tendencies to over-police and over-criminalize those who are poor. Increasing police involvement in preventative and rehabilitative social and community-based programs may only further erode trust and exacerbate tensions between the police and the community.

- **Mandate:** The police were invented to maintain law and order in the community by responding to visible signs of disorder and to a lesser extent by investigating major crimes. They were not intended to address many of the social problems that they are currently tasked with. With time, the number of social problems allocated to the police has increased. This phenomenon is sometimes referred in academic policing studies as “policification”,³² the process by which police services take on more and more roles and responsibilities over time that go beyond traditional law enforcement functions. Policification can be driven by a lack of appropriate resources or expertise to deal with the root causes of complex social issues, leading to an overreliance on law enforcement as a solution. For example, police officers are often asked to respond to

³¹ Goold, “Policing and Human Rights,” 235.

³² Andrew Millie, “The Case for a Narrower Focus to Policing,” *Research Focus* 2, no. 4 (2014): 1–4; Andrew Millie, “The Policing Task and the Expansion (and Contraction) of British Policing,” *Criminology & Criminal Justice* 13, no. 2 (2013): 143–60.

mental health crises or substance use issues, but they are not necessarily trained or equipped to handle these situations effectively. Alternative programs that are better positioned to address these social problems could be utilized instead of relying solely on the police.

- **Funding:** Advocates for defunding and detasking point out that police departments receive a disproportionate amount of funding compared to other municipal services. Policies and funding decisions that prioritize law enforcement over other types of government or community-based interventions is a major driver of policification. This has contributed to a lack of funding for programs that address the underlying causes of crime, such as poverty and lack of access to education and healthcare. Many scholars argue that a greater proportion of municipal funds should be redirected from police budgets to fund public sector programs that may be better equipped to address these issues.

Accountability

When police agencies are transparent about their practices and accountable for their actions, it enhances public confidence in the police and promotes greater cooperation between the police and the community. This, in turn, can lead to more effective policing, improved public safety, and better protection of human rights.

Accountability in the context of HRC policing is often discussed as comprising three tiers.³³

- ***Accountability to international standards:*** holding police departments accountable for their adherence to international human rights instruments such as the UDHR.
- ***Accountability to national and regional human rights laws:*** holding police accountable to national and regional human rights laws (e.g., OHRC), through courts, independent civilian review, internal disciplinary measures, and other mechanisms.
- ***Accountability to the community:*** to be accountable to members of the community, the police must establish a relationship of trust with the community, and actively engage with community members to understand their concerns and priorities.

³³ Hornberger, "Human Rights and Policing," 267.

The third tier is especially important from a governance perspective. The idea that the police should be responsive to the community they serve is not a new idea. The Code of Conduct for Law Enforcement Officials adopted by the UN General Assembly as early as 1979 stated: “like all agencies of the criminal justice system, every law enforcement agency should be representative of and responsive and accountable to the community as a whole...”.³⁴ To be responsive to the community, police leaders and their governing boards must be aware of public concerns and expectations concerning public safety and police operational methods and performance. Police leaders and their boards need to be aware of community needs and perspectives to represent and champion them in their work. Public concerns, needs, and expectations should be reflected in police and board policy, strategy, and action.³⁵

Another useful distinction drawn in research on policing and human is between **legal accountability and political accountability**:

Legal accountability includes the personal accountability of individual police officials to the law for their own acts or omissions. **Political accountability** includes the ability to ensure that a police agency is accountable for the ways in which it uses the resources that have been allocated to it. This type of accountability enables public scrutiny of the entire management and administration of a police agency as well as of its operational practices.³⁶

As many researchers emphasize regarding legal accountability, it is not only about holding the police officers directly responsible for an act or omission accountable, we should also consider that superior officers may be responsible too by virtue of having given an order. This dual focus of legal accountability, on acting police personnel and their superiors, has been codified in law in some jurisdictions. It is reflected for example in **Articles 16 and 17 of the European Code of Police Ethics**. As the commentary on these two Articles explains in the code:

The fact that all police personnel are responsible for their own actions, does not exclude that superiors may also be held responsible, for having given the order. The superior may be held responsible side by side with the “implementing” official, or alone in cases where the latter person followed orders in “good faith”. ... Through

³⁴ Crawshaw et al., *Human Rights and Policing*, 41.

³⁵ Crawshaw et al., 44.

³⁶ Crawshaw et al., 45.

an established chain of command, ultimate responsibility for police action can be traced in an effective way.³⁷

One potential concern to be wary of when devising a new policy or procedure focused on this kind of legal accountability concerns paperwork, although the extent to which this concern generalizes to other contexts like Canada is unclear. As one researcher reflects based on their work on human rights and policing in South Africa, “human rights policing, because it has a focus on accountability, translates into more bureaucratic paperwork to ensure that the various steps are traceable and verifiable”.³⁸ This tends to favour officers with better writing skills and risks making those less proficient at paperwork resentful toward any new requirements. In their experience of working with police officers in South Africa, this “exclusionary bias”, as they refer to it, “can lead human rights being rejected or despised or violently opposed within a police organization”.³⁹

Human Rights Culture

A “human rights culture” built on transparency, accountability, and community engagement is key in “securing good behaviour by police”.⁴⁰ Changing police culture is a critical step towards making meaningful and sustainable changes in the organization. In the context of policing, culture refers to the shared values, beliefs, and practices within the police organization that shape how police officers think, act, and interact with the public. When police culture is rooted in bias, discrimination, and mistrust, it can lead to the disproportionate use of force and mistreatment of certain communities, particularly those who are marginalized or vulnerable. A human rights culture in policing will better position the police to build trust with the public and work collaboratively to address systemic issues of prejudice and discrimination.

A human rights culture is one that treats both citizens *and* police personnel with fairness, respect, and dignity. Internal and external accountability in this sense are closely interlinked. As Bayley reflects, “internal accountability by police managers is a precondition for external accountability.... If the police themselves do not know what is going on, it is very unlikely that outsiders will”.⁴¹ Research affirms that when police officers

³⁷ Council of Europe, “The European Code of Police Ethics,” 2001, 66, <https://polis.osce.org/european-code-police-ethics>.

³⁸ Hornberger, “Human Rights and Policing,” 270.

³⁹ Hornberger, 270.

⁴⁰ Crawshaw et al., *Human Rights and Policing*.

⁴¹ Bayley, “Human Rights in Policing,” 545.

themselves feel that they are treated and fairly and with dignity within the organization itself they are more likely to treat those in the community the same way:

It is important that any police organisation has a culture of service excellence. The culture should be supportive of human rights, ethical standards of behaviour, and valuing citizens and employees. If employees are not valued and are treated in a negative way by their leaders or managers, they are likely to treat citizens in a similar manner.⁴²

The core principles that must be cultivated within the police service to achieve a more human rights-oriented culture are **legitimacy, transparency, accountability, performance, and fairness**. When these principles are respected internally, they are more likely to “transfer outside of the organization into the work performed by officers in their communities”.⁴³

Changing police culture is not easy. It is a difficult process that requires a commitment to ongoing **training, education, and dialogue**. However, the potential benefits of creating a more human rights-oriented police culture are significant and can lead to improved relationships between police and the public, enhanced public safety, and a more just and equitable society. “This is not to say that police culture cannot change, but to expect police officers to embrace rights without reservations may be overly optimistic”.⁴⁴

Focusing on good behaviour in policing is key to advancing a human rights culture in policing and key to effective policing.⁴⁵ Creating and implementing “monitoring and reward systems that carefully assess and then publicly celebrate human rights efforts by the police...”⁴⁶ is highlighted by many academic researchers as a key ingredient in success.

Substantive versus Symbolic Change

In academic research on policing and human rights, police presentational strategies are flagged as a potential barrier for meaningful human rights focused reform. The risk is that talk about human rights will fill in for action. This concern is not specific to the police nor to human rights. A well-known risk affecting any organization is that too much emphasis

⁴² Crawshaw et al., *Human Rights and Policing*, 365.

⁴³ Crawshaw et al., 385.

⁴⁴ Goold, “Policing and Human Rights,” 234.

⁴⁵ Crawshaw et al., *Human Rights and Policing*.

⁴⁶ Greene, “Policing through Human Rights,” 11.

will be placed talking about change without making real change in the institution. In other words, change becomes performative.

Many academic researchers working on policing and human rights describe a disconnect between what is said and what is done. The literature is replete with examples of too much time being spent talking about progressive change without making real, tangible change in operational processes, procedures, and behaviour. One policing researcher describes this as “a split ‘performance’ between a representational human rights frontstage and an operational human rights-ignoring backstage of everyday policing tactics”.⁴⁷

This disconnect between “**frontage**” (talk) and “**backstage**” (behaviour) **organizational change** can occur for many different reasons. Researchers writing on policing and human rights cite some combination of the following:

- **Lack of commitment:** The police service lacks the commitment to follow through with the changes they are discussing. It's easy to talk about change, but it takes effort and resources to implement it.
- **Resistance to change:** The police service is resistant to change, so they talk about it instead of making it happen. Change can be difficult, and many staff within the service may be comfortable with the way things are. They may be resistant to the idea of changing things, even if it would be better for the organization and the community.
- **Lack of a clear plan:** The police service talks about change without having a clear plan or strategy for how to implement, monitor, and evaluate it. The service may have a general idea of what they need to do, but they haven't thought through the details of how to do it. Without a clear plan, the service may struggle to make real change, even if they are committed to doing so.
- **Lack of accountability:** The police service may talk about change, but if they are not holding themselves accountable for implementing change, then it's unlikely that real change will occur. Accountability means setting clear goals, monitoring and measuring progress, and holding individuals and teams responsible for achieving those goals.

⁴⁷ Hornberger, “Human Rights and Policing,” 270–71.

Recruitment and Training

Discussions of recruitment and training are a core part of academic discussions of human rights in policing. From a human rights perspective, it is important that the police agency be representative of the community it serve in terms of values and in terms race, gender, language, religion, and other important characteristics. Researchers stress the importance of systematically assessing potential recruits on a wide range of human rights related dimensions. Police entrance and assessment standards should be carefully designed to select individuals that possess and demonstrate “greater tolerance of social ambiguity, ability to communicate effectively, and identify with the peacekeeping missions of the police” and its values and responsibilities from the perspective of human rights.⁴⁸ Candidates should be explicitly asked questions about matters like race, gender, and equity. Potential recruits found to “harbour bigotry or intolerance... should be rejected”.⁴⁹

There is a need for greater awareness of even basic human rights principles within police services. This can be partially addressed through expanded opportunities for training. Many academic researchers find that police and police leaders are “largely unaware of international legal provisions”.⁵⁰ We would venture to guess that the same is true of regional human rights laws like the Ontario Human Rights Code. All police officials should have knowledge of human rights, especially police leaders and those who are responsible for training and educating other members of staff.

Many researchers argue that that human rights-focused training should be a “non-negotiable training requirement for all members of the organisation, for both police and civilian support staff of all departments, grades and ranks”.⁵¹ In addition, many researchers argue that training outcomes should be tested and evaluated. At the end of a training session, police personnel should be tested to determine whether set specific learning objectives were met. Finally, researchers stress that human rights-focused training should be ongoing and occur throughout a person’s career, not just at the moment they are recruited to work for the service.

Two important training areas from the perspective of human rights are procedural justice training and trauma-informed policing training. **Procedural justice** is the idea that the fairness of a decision-making process depends not just on the outcome, but also on the

⁴⁸ Greene, “Policing through Human Rights,” 11.

⁴⁹ Crawshaw et al., *Human Rights and Policing*, 362.

⁵⁰ Crawshaw et al., *Human Rights and Policing*.

⁵¹ Crawshaw et al., 371.

fairness of the procedures used to arrive at that outcome.⁵² Officers that are well trained in procedural justice are more likely to establish positive and respectful relationships with community members, de-escalate potentially volatile situations without use of force, and treat people fairly and with dignity.

A **trauma-informed** approach to policing involves understanding the impact of trauma on individuals and using that understanding to inform interactions with community members in a compassionate and supportive manner.⁵³ Officers well trained in trauma-informed policing are more likely to take a compassionate and supportive approach to interactions with those who have experienced trauma in the community. Such practices improve public assessments of the police, bring the police greater legitimacy, and make it easier for the police to effectively do their job. Ultimately, “citizens judge the effectiveness of police organisations by the quality of the service they receive from police personnel, not by the quality of police equipment or the technology they use”.⁵⁴

While improved training is important it is not a magic bullet. Many academics researching human rights in policing find that a greater awareness of human rights does not necessarily channel into greater respect for human rights and human rights principles in practice. “[T]here has been an enormous change in human rights consciousness as it applies to police but considerably less in practice”.⁵⁵ This is not to suggest that training is ineffective, but rather to suggest that training alone is not enough on its own. Changes to roles and internal processes and procedures are equally if not more important to effecting behaviour change. As one researcher explains:

Concentrate on changing institutional behaviour rather than normative consciousness. Programmes of facilitation often begin by trying to change the attitudes of the people involved on the theory that this will lead to changed behaviour. This is naïve. Research has shown that the roles people are expected to play are more important than the attitudes and the values they bring to them. ... The key is not to adjust attitudes but to align the incentives of work to the requirements of human rights observance.⁵⁶

⁵² Tal Jonathan-Zamir, Stephen D. Mastrofski, and Shomron Moyal, “Measuring Procedural Justice in Police-Citizen Encounters,” *Justice Quarterly* 32, no. 5 (2015): 845–71.

⁵³ Karen Bateson, Michelle McManus, and Georgia Johnson, “Understanding the Use, and Misuse, of Adverse Childhood Experiences (ACEs) in Trauma-Informed Policing,” *The Police Journal* 93, no. 2 (2020): 131–45.

⁵⁴ Crawshaw et al., *Human Rights and Policing*, 361.

⁵⁵ Bayley, 541.

⁵⁶ Bayley, “Human Rights in Policing,” 545.

Measurement and Evaluation

Measuring success provides a framework for evaluating whether police practices are consistent with human rights principles and whether they meaningfully contribute to or undermine the protection and promotion of human rights. A central argument in research on policing and human rights is that police services and their governing boards need to fundamentally rethink the ways that different aspects of policing, including their effectiveness, are measured and evaluated. Without measurement, it is difficult to know if the desired results have been achieved. “‘You get what you measure,’ and measuring how the police uphold human rights and attaching recognition to such efforts is an important part of a strategy of elevating human rights in police response situations”.⁵⁷

There are many known limitations with existing approaches to quantifying police success. The traditional approach to measuring effectiveness in policing has been to use crime statistics, such as the number of reported crimes or the crime clearance rate, as a measure of police performance. Basing measurements of police success on the number of arrests, for example, creates an incentive for police to arrest more people, even if this is not needed to make communities safer. The focus on crime statistics as a measure of police efficacy is particularly troubling for communities of colour, as it can incentive officers to over-police them using tactics that are perceived as discriminatory, eroding trust and legitimacy in ways that can tangibly reduce the police’s effectiveness. **“Under a human rights regime, we might expand such measures to include levels of civic trust in the police, cooperation with the police in matters of neighbourhood crime, the sense of dignity people feel they are accorded by the police, and, in turn, how people pursue their civic responsibilities”**.⁵⁸

In rethinking how we measure policing success, researchers emphasize that police performance indicators be based on **“results achieved rather than programmes implemented”**.⁵⁹ That is, based on the measurement of tangible behaviours and outcomes, not intentions.

⁵⁷ Greene, “Policing through Human Rights,” 8.

⁵⁸ Greene, 16.

⁵⁹ Bayley, “Human Rights in Policing,” 544.

Strategic Planning

The final theme discussed in academic research on policing and human rights concerns the need for strategic planning. **“Human rights reform in the police is a heavier lift than generally recognised” and strategic planning plays a critical role in making organizational change possible.**⁶⁰ By providing a clear vision, conducting analysis, prioritizing change initiatives, engaging stakeholders, allocating resources, and monitoring progress, organizations can achieve their goals, adapt to changing circumstances, and improve performance.

- **Vision and Goals:** Strategic planning provides a clear vision and set of goals for the organization. This ensures that everyone involved understands the direction of the change and the desired outcomes. By defining the desired future state, organizations can set the foundation for the changes they want to achieve. For example, a goal might be to improve police-community relations. The vision should be communicated to all stakeholders, including officers, community members, and policymakers. It requires “explicit plans for the institutionalizing of human rights” targeted at specific aspects of policing and police governance, such as training or accountability.⁶¹
- **Analysis:** Strategic planning enables the organization to analyze its current situation, identify gaps, and opportunities for improvement. This analysis can include identifying organizational strengths and weaknesses, potential barriers to change, and opportunities for innovation. A human rights-focused police service requires an analysis of the current state of policing. This includes an examination of policies, procedures, training, and accountability mechanisms. For example, an analysis may reveal that there are no protocols in place for dealing with individuals with mental health issues or that training on de-escalation techniques is insufficient.
- **Prioritization:** Strategic planning helps to prioritize which changes are most urgent, given limited resources. This ensures that the most critical issues are addressed first, and that change efforts are focused and effective. Once an analysis is conducted, the next step is to prioritize areas for improvement. For example, if the analysis reveals a lack of training on de-escalation techniques or procedural justice, the police force can prioritize developing and implementing new training programs. One researcher

⁶⁰ Bayley, 545.

⁶¹ Bayley, 544.

recommends that “the place to begin is with the behaviours that the local population most resents”, since “All human rights deficits cannot be addressed at once”.⁶²

- **Stakeholder Engagement:** Strategic planning facilitates engagement with a diverse group of stakeholders, including employees, citizens, policymakers, and other relevant parties. This inclusive approach ensures that all voices are heard, and the concerns and perspectives of all stakeholders are considered, leading to a better understanding of the potential impact of the change. For example, the police service and its governing board can establish a community advisory board or hold town hall meetings to gather feedback and input from the public.
- **Resource Allocation:** Strategic planning allows the organization to allocate resources effectively to support the change initiative. This includes identifying the necessary funding, staffing, and technology needed to implement the change successfully. Resources need to be allocated effectively to support meaningful change.
- **Monitoring and Evaluation:** Strategic planning provides a framework for monitoring and evaluating the progress of change. This allows the organization to assess whether the change is achieving the desired outcomes and adjust as needed.

⁶² Bayley, 545.

**PART III:
REVIEW OF PPSB POLICIES**

Part III: Review of PPSB policies

Police boards are positioned to play a critical role in ensuring that the police uphold principles of human rights. Levers available to the board include but are not limited to:

- Establishing and enforcing policies that uphold human rights and prohibit discrimination, abuse of power, and other violations of human rights.
- Reviewing and approving the service's budget and ensuring that resources are allocated in a way that supports human rights.
- Monitoring and reviewing the service's use of force policies and practices to ensure they are consistent with human rights standards.
- Reviewing the handling of complaints of human rights violations by police officers and ensuring appropriate action was taken, including disciplinary measures.
- Providing oversight for the service's training and professional development programs to ensure that officers are adequately trained on human rights principles and how to apply them in their work.
- Fostering community engagement and working with community groups to ensure that the service's policies and practices are responsive to the needs of the community.
- Reviewing and approving the service's data collection and reporting practices to ensure that they are consistent with human rights standards and the broader goals of human rights-centred policing.
- Regularly reviewing and evaluating the service's performance in upholding human rights and making recommendations for improvement.

By using the levers available to them, including policy establishment, fiscal oversight, monitoring of practices, and community engagement, the Board can help ensure that PRP operates in a manner that respects and upholds the rights and dignity of all individuals.

To achieve this goal, police boards must establish and enforce policies that uphold human rights and prohibit discrimination, abuse of power, and other violations. Boards must review and approve service budgets, ensuring that resources are allocated in a way that supports human rights initiatives and priorities. They also monitor and review use of force policies and practices, handling complaints of human rights violations, and oversee training programs to ensure officers are adequately trained in human rights principles. Furthermore, fostering community engagement and working with community groups is essential to ensure that department policies and practices are responsive to the needs of the community. Finally, police boards play a vital role in reviewing and approving data

collection and reporting practices, ensuring they align with human rights standards and support broader goals of human rights-centered policing.

Below we outline the methodology utilized in our policy review.

Review Methodology

We examine PPSB policies through the lens of human rights. We examine each policy along the following 12 dimensions: commitment to human rights, legal conformity, non-discrimination, transparency, accountability, measurement and evaluation, training, community engagement, strategic alignment, definitions, language, accessibility, and potential unintended consequences.

This comprehensive and multidimensional review provides a robust framework for assessing the human rights implications of each policy. We provide a list of guiding questions for each dimension in Table 1. Using this methodology, we identify shortcomings within each policy and provide concrete recommendations for improvement. Where significant gaps are identified, we propose the development of new policies to strengthen the existing framework.⁶³

We review each of the Board's 51 [governance policies](#). A future review could be expanded to include adequacy standard policies.

In total, we make 91 recommendations. These recommendations serve as a roadmap for refining existing policies and crafting new ones that uphold the core tenets of human rights policing. Each recommendation is encapsulated in the policy matrix, providing a simplified overview. For instance, if a recommendation aims to improve reporting mechanisms within a specific policy, that policy would be marked accordingly in the matrix.

⁶³ In some instances, we suggest the formulation of new policies to address gaps. We recommend three. First, we recommend the reintroduction of a policy governing chief performance evaluation and compensation. Second, we recommend the Board develop a public consultation policy outlining clear guidelines for when and how public input will be sought and what will be done with the input obtained. Third, we recommend the Board create a policy defining "critical points" in line with the recommendations of Morden following the G20 summit.

Table 1 Review dimensions and guiding questions

Dimension	Guiding Questions
Statement of Commitment	<ul style="list-style-type: none"> ▪ Does the policy clearly and unequivocally state the Boards commitment to uphold human rights, respect diversity, and ensure the fair and just treatment of all individuals within the community?
Conformity with relevant laws and policies	<ul style="list-style-type: none"> ▪ Does the policy conform with relevant Canadian human rights legislation or standards explicitly referenced in the policy? ▪ Are human rights-related statements, definitions, and provisions in conformity with the Ontario Human Rights Code and other relevant Canadian human rights legislation or standards? ▪ Is the policy consistent with the seven key principles of the OHRC's Policy on Eliminating Racial Profiling in Law Enforcement: acknowledgement, engagement, policy guidance, data collection, monitoring and accountability, organizational change, and multi-year action plan?
Non-discrimination and Equal Treatment	<ul style="list-style-type: none"> ▪ Does the policy outline specific measures to prevent discrimination based on race, ethnicity, religion, gender, sexual orientation, socioeconomic status, or any other protected characteristics?
Transparency	<ul style="list-style-type: none"> ▪ Does the policy provide clear and accessible information to the public about the Board's decision-making processes, activities, and outcomes? ▪ Is there a commitment with the policy to regularly update and communicate relevant information to the community in a timely manner?
Accountability	<ul style="list-style-type: none"> ▪ Does the policy articulate a clear and transparent process for reporting and addressing any deviations from established standards, ensuring accountability both for the Board's actions and decisions as well as the Chief of Police's individual performance and adherence to the set standards?
Measurement and Evaluation	<ul style="list-style-type: none"> ▪ Does the policy have clear mechanisms for measuring and evaluating relevant service activities that are detailed in the policy? ▪ Are the policy's existing approaches to measurement and evaluation consistent with the goals of human rights-centered policing?
Training and Education	<ul style="list-style-type: none"> ▪ Does the policy explicitly reference human rights-related training and education? ▪ Are the policy's existing human rights-related training and education provisions mandatory, ongoing, up-to-date, and sufficient in scope?
Community Engagement	<ul style="list-style-type: none"> ▪ Does the policy encourage meaningful community engagement and input in shaping Board priorities and governance/oversight functions?
Strategy	<ul style="list-style-type: none"> ▪ Does the policy connect relevant provisions to a broader overarching strategy and/or diversity plan?
Definitions	<ul style="list-style-type: none"> ▪ Are human rights-related keywords and phrases in the existing policy clearly defined?

	<ul style="list-style-type: none">▪ Does the policy need the definitions of human rights-related keywords and phrases updated or added?
Language and Accessibility	<ul style="list-style-type: none">▪ Is the policy clearly written using easy-to-understand, accessible language consistent with current discourses on human rights?▪ Does the policy contain any minor typos or grammatical mistakes?
Unintended Consequences	<ul style="list-style-type: none">▪ Does the existing policy risk unfairly benefiting or otherwise impacting certain groups or segments of the community over others?▪ Will the proposed revisions to the policy help mitigate concerns about unintended consequences?

	Opening Statement - Background	Definitions	Conformity with Relevant Laws	Training	Reporting	Human Rights Language	Enhancing Public Transparency	Typos, Grammar & other Minor Comments	Board Governance: Significant Board Authority	Board Review, Examination, and Analysis	Chief Performance Evaluation	Other
PRP-LG-006 Legal Indemnification Claims	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
PRP-LG-007 Misconduct and Discipline	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
PRP-LG-008 Internal Complaints Against Chief or Deputy Chief	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
PRP-OP-001 Community Events Paid Duty	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
PRP-OP-002 Alarms	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
PRP-OP-003 Collection of Info Identifying Information in Certain Circumstances-Prohibition and Duties	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
PRP-OP-004 Disclosure of CVOID-19 Status Information	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
PRP-OP-005 Body Worn Cameras	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
PRP-OP-006 Special Investigation Reporting	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
PRP-OP-007 Conflict of Interest	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
PSB-AI-001 Board Procedures	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
PSB-AI-002 Code of Conduct for Board Members	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
PSB-AI-003 Political Relationships	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	Opening Statement - Background	Definitions	Conformity with Relevant Laws	Training	Reporting	Human Rights Language	Enhancing Public Transparency	Typos, Grammar & other Minor Comments	Board Governance: Significant Board Authority	Board Review, Examination, and Analysis	Chief Performance Evaluation	Other
PSB-AI-004 Media Relations	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
PSB-AI-005 Using Board Resources During an Election Period	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
PSB-AI-006 Board Member Badges	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
PSB-FN-001 Board Expenses - Travel	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
PSB-FN-002 Community Support and Recognition Fund	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
PSB-FN-003 Rewards Policy	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
PSB-HR-001 Civilian Long Services Awards	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
PSB-FN-003 Succession Planning	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
PSB-FN-004 Board Member Recognition	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
PSB-FN-007 Acting Appointments - Executive Positions	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
PSB-LG-001 Operation Service Agreements	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Table 3: Key governance/oversight powers in board policy

Policy	Section(s)
PRP-FN-002 Audits	Under Section 1.5 , the Board can request external auditors conduct audits addressing “systemic organizational issues or issues of an emergent nature that are of significant public interest”. Section 1.6 gives the Board ability to request external audits on “matters of concern to the Board”. Section 1.7 affords the Board power to request “sufficient funds to procure external auditing services” in its annual operating budget request.
PRP-LG-003 Delegated Authority	The Board can amend PRP-LG-003 to maintain control as they deem necessary. This includes the option to reduce authority granted to the Chief of Police, particularly in specific operations/duties where the Board wishes to exert greater oversight.
***PRP-LG-004 Complaints of Misconduct (Formally Complaints)	***The previous version of this policy included what we have identified as key governance and oversight powers. Specifically, Section 9 of the previous policy stipulated that the Board can conduct reviews of complaints about the Chief of Police. The authority to review complaints is further outlined in Section 7 of the previous policy, allowing the Board to conduct reviews upon request from a complainant. The Board may wish to revisit the old policy and incorporate relevant provisions in the new policy.
PRP-OP-003 Collection of Identifying Information in Certain Circumstances - Prohibition and Duties	Under Section 13 , the Board can request copies of all training modules of Regulated Interactions from the Chief of Police for review. Section 17 provides the Board with the authority to request the Services collected regulated interaction data from the Chief of Police for review. In accordance with Section 16 , if disproportionate collection is identified, the Board should take this factor into consideration during the Chief of Police’s compensation/performance review.
PSB-FN-007 Acting Appointments - Executive Positions	Under Section 1.3 , the Board can appoint an Acting Chief or Deputy Chief in the event the Chief or Deputy Chief is the subject of a complaint or disciplinary proceeding.

Findings and Recommendations

PRP-AI-002 Civil Actions Management and Dispositions

Link to policy: <https://www.peelpoliceboard.ca/en/who-we-are/resources/board-policies/PRP-AI-002-Civil-Actions-Management-Disposition-.pdf>

Last updated: 2019/09/27

Recommendation #1: Under section 2.a, the Chief is required to report to the Board (or Board-designated Committee) on an annual basis. Section 2.b details what information should be included in annual reporting. We recommend the Board consider expanding annual reporting to include racially disaggregated statistics on ongoing, resolved, and historical civil actions. Additionally, we advise the Board to consider ways of improving public access to publicly reported statistics and other information, e.g., open data portal. The OHRC has recommended that the PRP “publicly release data annually in a manner that allows for meaningful analysis of the data collected by PRP, through the development of an open data portal”. Data on civil actions could be released as part of this broader effort.

PRP-AI-003 Workplace Violence and Harassment

Link to policy: <https://www.peelpoliceboard.ca/en/who-we-are/resources/board-policies/PRP-AI-003-Violence-and-Harrassment-in-the-Workplace.pdf>

Last updated: 2017/01/27

Recommendation #2: We recommend the Board consider incorporating language of “adequate and effective policing” into the opening policy statement, affirming the integral role that a safe and secure workplace plays in the Service’s ability to uphold the highest possible standards of policing. For example: “the Board explicitly recognizes the paramount importance of providing a safe and healthy work environment as fundamental to the Service's ability to deliver adequate and effective policing. The Board is dedicated to fostering an environment that prioritizes employee well-being and acknowledges the integral role a secure workplace plays in achieving the highest standards of policing.”

Recommendation #3: We recommend the Board underscore the role of police culture in the opening policy statement. It is of critical importance to foster a culture wherein workplace violence and harassment are deemed unacceptable, and within which individuals feel safe in coming forward with concerns of workplace violence and harassment without fear of reprisal or negative consequence.

Recommendation #4: We recommend the Board modify paragraph four of the opening statement to prioritize the “prevention” of workplace harassment.

Recommendation #5: We recommend the Board modify the definition of “Prohibited Grounds” (page 2) to incorporate a phrase such as “or any other ground protected under the Ontario Human Rights Code”. This addition is proposed to accommodate the dynamic and evolving nature of human rights.

PRP-AI-004 Accessibility Standard for Customer Service

Link to policy: <https://www.peelpoliceboard.ca/en/who-we-are/resources/board-policies/PRP-AI-004-Accessibility-Standard-for-Customer-Service.pdf>

Last updated: 2015/09/25

Recommendation #6: We recommend the Board incorporate language about barriers and removal of barriers to the policy consistent with section 6.a of the AODA: “(a) set out measures, policies, practices or other requirements for the identification and removal of barriers with respect to goods, services, facilities, accommodation, employment, buildings, structures, premises or such other things as may be prescribed, and for the prevention of the erection of such barriers”.

Recommendation #7: We recommend the Board add a definition for “Barrier” to the policy. Barrier as defined in the AODA “means anything that prevents a person with a disability from fully participating in all aspects of society because of his or her disability, including a physical barrier, an architectural barrier, an information or communications barrier, an attitudinal barrier, a technological barrier, a policy or a practice; (‘obstacle’)”.

Recommendation #8: We recommend that the Board modify section 4.b to take into account the possibility of public meetings being held online, and what that means for people with disabilities.

PRP-AI-005 Human Rights Application Management and Dispositions

Link to policy: <https://www.peelpoliceboard.ca/en/who-we-are/resources/board-policies/PRP-AI-005-Human-Rights-Applications--Actions-Management--Disposition.pdf>

Last updated: 2018/11/23

Recommendation #9: The opening policy statement declares that it is the PPSB’s policy with regards to human rights applications filed with the Human Rights Tribunal of Ontario that “it will defend itself in a manner that protects the interests and reputation of the Board and the police service, including any individual members that may be named, protects the interests of the residents of the Region of Peel...”. The Board may want to recognize that the interests of the public and the interests of the service may conflict. As such, the Board may seek to balance the interests of the service and the public. The service may be principally interested in protecting its reputation or individual members of the service, while the interests of the public may be more focused on institutional accountability and transparency.

Recommendation #10: In the last sentence of the opening statement, the Board commits to “the professional administration of all applications with a view to bringing a resolution in fair manner and as effective and cost-efficient manner as possible” (typos in original). To enhance this commitment, we recommend the Board also emphasize in this statement the importance of transparency in the process and underscore as well a dedication to respecting human rights. For example: “The Board is dedicated to a fair and transparent defense strategy that respects human rights and seeks to bring about a resolution in a manner that is both effective and cost-efficient”.

Recommendation #11: Section 1.1 states that it is the policy of the Board “that complete compliance with legislative and constitutional requirements, and recognized legal principles and guidelines are followed”. We recommend the Board expand on this provision by detailing specific, relevant laws and constitutional requirements (e.g., Ontario Human Rights Code, Charter of Rights and Freedoms, Accessibility for Ontarians with Disabilities Act). We further recommend incorporating language that commits the Board to a proactive approach to staying current with evolving laws and legal standards, demonstrating the Board’s commitment to continuous improvement, legal excellence and the protection and promotion of human rights in its operations.

Recommendation #12: Section 2 requires the Chief to report to the Board on an annual basis via an in camera report. We recommend the Board initiate a discussion about whether all or some of the information compiled into this in camera report, detailed in sections 2.a through 2.e, could be made public. While it is important to maintain confidentiality where necessary, especially regarding ongoing applications, a public-facing version of the same report providing summary or general statements about resolved cases may help foster greater transparency and public trust.

Recommendation #13: Sections 2.a through 2.e outline the information that is to be included in the “annual statistical comparisons and trend analysis” in the Chief’s In Camera report. We recommend the Board require race-based data collection and analysis as part of the report. The importance of race-based data collection, analysis, and reporting could be articulated in a new subsection, 2.f.

PRP-AI-006 Community Survey

Link to policy: <https://www.peelpoliceboard.ca/en/who-we-are/resources/board-policies/PRP-AI-006-Community-Survey.pdf>

Last updated: 2017/01/27

Recommendation #14: In the policy's opening statement, the Board "recognizes the importance of well conducted external community surveys to provide the Board and the Service with critical insight...". We recommend the Board expand the opening statement by providing greater context into the ways that survey data will be used and why it is critical to good policing. The board may also want to include a statement underscoring the value of community surveys for performance measurement.

Recommendation #15: The Background section states the Board and the Service "values public input" and that the Board is "respectful of the public's right to be involved". We recommend the Board add language to the Background section underscoring more clearly that the Board requires insight into public attitudes, expectations, and satisfaction as a means of evaluating Service performance and ensuring adequate and effective policing in Peel Region.

Recommendation #16: There is at present no public reporting requirement regarding community surveys. The Board may want to consider adding a public reporting requirement to the Policy, formalizing a channel through which members of the public can obtain, for example, final results of the survey.

Typos and other minor comments: "evidence based data" (section 2.f)

PRP-AI-007 Anti-Racism and Ethnocultural Equity

Link to policy: <https://www.peelpoliceboard.ca/en/who-we-are/resources/board-policies/PRP-AI-007-Anti-Racism-and-Ethnocultural-Equity.pdf>

Last updated: 2017/01/27

Recommendation #17: The Background section of the policy could be revised to incorporate more human rights focused language (e.g., anti-racism). Policy background could make mention of the importance of culture, training, preventative measures, and procedural justice. The Board should ensure that the Service is taking steps to create a culture conducive to members coming forward with concerns about racism and equity.

Recommendation #18: The Background section lists “race, ethnicity, culture, nationality, religion, or language”. Section 2 states that it is the policy of the Board that discriminatory treatment will not be tolerated. This section lists “race, sex, sexual orientation, place of origin, age, disability, and socio-economic status”. The name of the policy refers to “anti-racism and ethnocultural equity”. We recommend the Board review the scope of this policy and whether it is intended as a general policy to advance all forms of equity and oppose all forms of discrimination, or whether it is intended to be more restrictive to what the Board understands as “anti-racism and ethnocultural equity” as implied by the policy title and Background.

Recommendation #19: We recommend the Board include a Definitions section to the policy that defines key terms including, but not limited to, “discrimination”, “equality and equity”, “diversity”, “anti-racism”, and “cultural competencies”. Definitions could be drawn with the help of OHRC glossaries and other resources.

Recommendation #20: Given the dynamic and evolving landscape of human rights, the Board may wish to update the statement about discriminatory treatment in section 2.1 to close with something like “or any other protected category under the Ontario Human Rights Code”.

Recommendation #21: Section 2.3 requires the Chief to “develop procedures that reinforce and encourage positive, professional, ethical and ethno culturally sensitive practices, in particular, service delivery”. The Board may want to consider updates to the language here, e.g., by incorporating more current anti-racism and human rights focused terminology.

Recommendation #22: Section 2.4 requires the Chief to include “training programs that address issues of diversity and cultural competencies”. The Board may want to consider updates to the language here, e.g., by incorporating more current anti-racism and human rights focused terminology.

Recommendation #23: The Board may wish to broaden the scope beyond just “training” to emphasize the necessity of robust and continuous education, integrating a testing component. Human rights- (and anti-racism)-based training should not just be a one-time event but rather an ongoing process.

Recommendation #24: The Board may consider adding a reporting requirement to the policy, e.g., annual reports from the Chief that would provide the Board with insight into how well the policy requirements are being met through the utilization of Key Performance Indicators.

PRP-AI-008 Access to Information

Link to policy: <https://www.peelpoliceboard.ca/en/who-we-are/resources/board-policies/PRP-AI-008-Access-to-Information.pdf>

Last updated: 2017/06/21

Recommendation #25: Access to personal and general information under MFIPPA is an important source of transparency and accountability. The Board may wish to add a sentence or two to the policy opening statement that states this. By upholding the tenets of MFIPPA, the Board reaffirms its commitment to fostering a culture of transparency, trust, and responsible governance within the region of Peel.

Recommendation #26: Reporting as detailed in section 5 occurs on an “exception basis”. Given the relevance of MFIPPA’s administration from a human rights perspective, the Board may wish to standardize the reporting frequency, such as on an annual basis, to ensure a regular and consistent flow of information about the administration of MFIPPA generally not just issues of potential liability. A standardized report could include things like the number of information requests received, processing times, nature of requests, disposition of requests (e.g., fulfilled, partially fulfilled, denied, along with reasons for denial), appeals and reviews, training initiatives, improvement measures.

Recommendation #27: MFIPPA governs access to personal information and general information. Both are equally important for a well-functioning police service that operates in accordance with the highest standards of transparency and accountability and respect for human rights. Given the significance of MFIPPA from a human rights perspective, the Board may wish to extend its Background discussion to comment on the importance of MFIPPA, highlighting its dual affordances for members of the public – providing access to not only personal records but also to general records like policies, procedures, and statistical data. This broader access empowers members of the public to gain a comprehensive understanding of police operations and contributes to building trust and accountability within the community.

Recommendation #28: While the formal AODA-related requirements of the MFIPPA are minimal – users can request time extensions where barriers exist as defined under AODA and the Lieutenant Governor in Council can pass a regulation requiring the head of an institution to assist persons with disabilities in making requests – the Board may wish to go further in adding a provision to section 4 of the policy requiring the Chief - or delegate - to take all reasonable measures to ensure that the processing of access request is conducted in accordance with AODA standards.

Typos and other minor comments: “poweres” (page 2)

PRP-AI-009 Strategic Planning

Link to policy: <https://www.peelpoliceboard.ca/en/who-we-are/resources/board-policies/PRP-AI-009---Strategic-Planning.pdf>

Last updated: 2024/04/1 (adopted)

Recommendation #29: The Board may consider adding language to the opening statement of the policy recognizing its commitment to protecting and advancing human rights through the strategic planning process, and associated reporting.

Recommendation #30: The *CSPA* mandates that strategic planning take into account the perspectives and experiences (i.e., interactions) of Indigenous people, members of racialized groups, and individuals with mental health conditions. The Board may consider explicitly acknowledging further human rights related objectives and indicators as deemed appropriate to Section 1. (c) or (d) of the policy. The Board may also consider adding a related reporting requirement to Section 9. of the policy.

Recommendation #31: Section 1. (e) and (f) describe very similar information. *CSPA* stipulates collection of data in alignment with Section 1 (f) of the policy. The Board may consider removing Section 1. (e).

Recommendation #32: The Board may consider adding a reference to training in Section 7. of the policy to ensure that ongoing training aligns with the Strategic Plan.

Recommendation #33: The Board may consider adding the *Charter of Rights and Freedoms* and the Ontario Human Rights Code to the list of Legislative Authorities.

Typos and other minor comments: Missing a period (.) at the end of Section 6.

PRP-AI-0010 Quality Assurance

Link to policy: <https://www.peelpoliceboard.ca/en/who-we-are/resources/board-policies/PRP-AI-010---Quality-Assurance.pdf>

Last updated: 2024/04/1 (adopted)

Recommendation #34: The Board may consider adding the word “equity” to the second sentence of the opening policy statement so that it reads: “With a steadfast dedication to accountability, efficacy, **and equity**, the Peel Police Service Board (the “Board”) is unwavering...”

Further considerations related to quality assurance are included in our recommendations for **PRP-FN-002 Audits**.

PRP-CP-001 Community Safety Release of Info to Victims

Link to policy: <https://www.peelpoliceboard.ca/en/who-we-are/resources/board-policies/PRP-CP-001-Community-SafetyAct-ReleaseInfoToVictims.pdf>

Last updated: 2018/11/23

Recommendation #35: The Board may wish to acknowledge in either the opening policy statement, by addition of a Background, or other amendment that there are human rights considerations inherent to the release of personal information to victims. Information sharing can be uneven and patterned by race and other sociodemographics, potentially leading to disparities in the treatment of victims. From a human rights perspective, it may be desirable for the Board to establish guidelines that ensure equitable and unbiased information disclosure. This could be achieved in part through provision of training to enhance officer awareness of potential biases and promote principles of human rights and equal treatment in all aspects of policing, including with respect to the treatment of victims.

Recommendation #36: Section 2 requires the Chief to conduct an “ongoing statistical analysis, and qualitative and quantitative review of all disclosure of personal information...”. The Board may wish to have this information reported to it on a regular basis (e.g., annually). Given the sensitive nature, this report may need to be received by the Board in camera. The Board may also want to consider whether race and other sociodemographic data should be collected, analyzed, and reported at an aggregate-level as part of this reporting requirement. In the current version of the policy, the Chief is only required to report under Section 3 “on those circumstances where the disclosure or non-disclosure of personal information to a victim has resulted in an ‘exceptional’ circumstance...”.

Recommendation #37: Section 1.c iterates a provision that appears verbatim in several other Board policies: “ensures that members act with full respect for human dignity and according to professional standards of skill, integrity, and accountability”. Updates to the language in this provision would provide the Board with an opportunity to make greater mention of human rights in its policies. For example: “ensures that members act with full respect for human dignity and all other human rights and according to professional standards of skill, integrity, and accountability.” We recommend the Board update the language in this provision and apply any updates to all policies it appears.⁶⁴

⁶⁴ “This provision appears verbatim in the following policies: PRP-AI-003/004, PRP-CP-001/002/003, PRP-LG-002, PRP-OP-001.”

PRP-CP-002 Community Safety Release of Information on High-Risk Offenders

Link to policy: <https://www.peelpoliceboard.ca/en/who-we-are/resources/board-policies/PRP-CP-002-Community-SafetyAct-HighRiskOffdrs.pdf>

Last updated: 2018/11/23

See recommendations 36 and 37 re: PRP-CP-001.

PRP-CP-003 Community Safety Sharing of Information with Other Agencies

Link to policy: <https://www.peelpoliceboard.ca/en/who-we-are/resources/board-policies/PRP-CP-003-Community-SafetyAct-InfoSharingWithPartners.pdf>

Last updated: 2013/11/20

Recommendation #38: The Board may want to acknowledge, either in the policy opening statement, through the addition of a Background section, or via other amendments, that there are inherent human rights considerations when sharing personal information between police and other government bodies. The potential expansion of surveillance practices raises concerns about maintaining control over how information is used by those on the receiving end. These concerns are particularly pronounced when dealing with marginalized groups, as increased surveillance may exacerbate existing disparities and disproportionately impact some communities more than others. To address these potential challenges and uphold human rights principles, the Board may want to implement policy measures that help mitigate the risk of unwarranted surveillance practices and promote responsible information use by partners.

See recommendations 36 and 37 re: PRP-CP-001

PRP-CP-004 Adequate and Effective Policing

Link to policy: <https://www.peelpoliceboard.ca/en/who-we-are/resources/board-policies/PRP-CP-004---Adequate-and-Effective-Policing.pdf>

Last updated: 2024/04/01 (adopted)

Recommendation #39: The opening policy statements makes reference to key human rights principles (e.g., accountability). The Board may wish to go further by incorporating additional specific language. We recommend that the Board revise the second sentence of the opening policy statement to read: “By implementing robust processes and mechanisms for adherence, review, and continuous enhancement, we strive to achieve improved policing outcomes and **increased community safety, while fostering a culture of respect, fairness, and equity within the Peel Regional Police Service**” or something to that effect.

Recommendation #40: The *CSPA* makes reference to the *Charter of Rights and Freedoms* and the *Human Rights Code* in opening the “Adequate and effective policing” section (11.1) of the *Act*. We recommend the Board revise the opening policy statement to align with the *Act*. For example, the third sentence of the policy statement could be revised to read: “Our unwavering commitment extends to ensuring full compliance with all provisions outlined in Ontario Regulation 392/23 - Adequate and Effective Policing (General), **and in accordance with the Canadian Charter of Rights and Freedoms and Ontario Human Rights Code**” or something to that effect.

Recommendation #41: We recommend the Board consider adding specific timelines for review and update to Section 1 of the policy.

Further comments and suggestions: Section 2 of the policy deals with the Chief’s preparation of an emergency plan for the Service. We advise the Board to consider our recommendation for a new policy at the end of this document dealing with “critical points” It would be advantageous for the Board to define “critical points” as outlined in the [Morden Report](#) to facilitate the Chief’s development of an emergency plan. This policy could then be revised accordingly.

The Board may also want to make reference for the need for appropriate training, including relevant human rights considerations, for Service members in Section 3 of the policy.

PRP-FN-001 Procurement

Link to policy: <https://www.peelpoliceboard.ca/en/who-we-are/resources/board-policies/PRP-FN-001-Procurement.pdf>

Last updated: 2023/07/12

Recommendation #42: Procurement involves acquiring goods, services, and technology, and the decisions made during this process can have profound implications for human rights. What the Service procures has potential to impact some communities more significantly than others, risking exacerbating inequalities. This can take many forms, such as procurement of new surveillance technologies, use of force equipment, or other resources that may disproportionately affect marginalized communities. Procurement decisions in this sense can run counter to the broader movement toward a more human rights-focused police service. We recommend the Board consider adding, either to the policy opening statement or by addition of a Background, a statement affirming its commitment to upholding transparency and accountability in procurement, as well as the potential negative impact that procurement decisions can have for human rights.

Recommendation #43: Part I section 1.1 states the following guiding principle: “to maintain trust and confidence in the stewardship of public funds through objective, fair, transparent and efficient procurement processes”. We recommend the Board initiate a comprehensive discussion of the practical steps and strategies it ought to be undertaking to ensure fulfillment of this and other guiding principles stated in Part I sections 1.1 through 1.5.

Recommendation #44: Part I section 1.4 states the following guiding principle: “to promote procurement practices that have regard for the accessibilities of persons with disabilities...”. We recommend the Board revise this guiding principle or add a new guiding principle 1.6 that includes reference to human rights. Key human rights related considerations include equitable opportunity in the procurement process, as well as considerations about human rights related concerns connected to suppliers and their supply chains.

Recommendation #45: Part XVII section 17.1 requires the Director of Procurement to provide the Board, on a regular basis, with a summary report of procurement activities that includes “but is not limited to” the information listed in sections 17.1.1 through 17.1.8. The Board may wish to add a new subsection 17.1.9 compelling the Director to report on whether and how equity and human rights-related considerations were part of the procurement process.

Recommendation #46: We recommend the Board conduct a comprehensive review to assess current practices for sharing procurement-related information with the public. This

analysis should encompass an analysis of what information is currently shared and how it is shared with the objective of identifying opportunities to improve transparency and accountability.

Recommendation #47: There is currently no direct mention of Artificial Intelligence, yet given the rapid evolution and potential human rights implications of AI on various aspects of policing, the Board may wish to address this omission. Facial recognition and other AI technologies are becoming more prevalent in police and other public services posing unique challenges and risks from a human rights perspective. In light of the potential risks and ethical considerations associated with novel AI technologies, the Board may want to implement a pause or temporary suspension on procurement of specific products or applications while heightening oversight and review of others.

PRP-FN-002 Audits

Link to policy: <https://www.peelpoliceboard.ca/en/who-we-are/resources/board-policies/PRP-FN-002-Audits.pdf>

Last updated: 2017/09/29

Recommendation #48: The opening policy statement notes that it is the Board’s intent to “protect the integrity of the police service through audits by ensuring controls are established and maintained and that resources, including personnel, equipment and public funds are utilized in the most efficient, effective and economic manner, and that programs and systems achieve their intended goals”. We recommend the Board revise the language here to include mention of human rights. The Board may also wish to note the important role that audits play in allowing it to ensure adequate and effective policing in the Peel region.

Recommendation #49: Audits can take many forms and are a core component of Board governance and oversight. We recommend the Board clarify the nature and objective of audit in an added Definitions section or other section of the policy. For example: “an audit refers to a systematic examination of various processes, practices and activities to assess their compliance with established policies, legal requirements, and ethical standards. Audits play a critical role in ensuring transparency, accountability, and adequate and effective police service delivery. Different forms of audit include but are not limited to equity audits, operational audits, compliance audits, financial audits, and performance audits”.

Recommendation #50: If adding a Definitions section to the policy, we recommend the Board also provide definitions for “systemic organizational issues” (section 1.5) and “external audits” (sections 1.5, 1.6).

Recommendation #51: Section 2.1 requires the Chief to report, on an annual basis, a “work plan which will identify and prioritize audits to be conducted that will provide assurance to the Board that police operations are operating effectively”. We recommend the Board add mention of human rights to this section. For example: “...are operating effectively and in accordance with core principles of human rights”. From a human rights perspective, operations can only be effective where the service is also promoting and upholding human rights.

Recommendation #52: The work plan referenced in section 2.1 is reported to the Board “at a public or a confidential meeting as deemed appropriate”. To advance transparency, the Board may wish to allow for confidential reporting only under exceptional circumstances rather than leaving the matter open to the Board’s/Chief’s discretion.

PRP-FN-004 External Funding Assistance – Police Investigations

Link to policy: <https://www.peelpoliceboard.ca/en/who-we-are/resources/board-policies/PRP-FN-004-External-Funding-Assistance---Police-Investigations.pdf>

Last updated: 2014/09/26

Recommendation #53: We recommend the Board, by revising the opening policy statement and/or through addition of a Background section, acknowledge the risks posed to perceptions of public trust and police impartiality when accepting funds, goods and services-in-kind from external sources, especially private entities. This acknowledgement should underscore the Board's commitment to transparency and the safeguarding of public trust, addressing concerns that may arise.

Recommendation #54: The policy Subject section (section 1) states that the policy governs the "conditions under which the Chief of Police is to accept funding assistance from external agencies, including government bodies...". We advise the Board to clarify here the full range of possible sources for funding assistance. The language of "external agencies, including government bodies" is potentially misleading given the broad scope of the policy. The definition of "External Funding Assistance" in the Definitions section (section 2) refers to "private funding", suggesting that funding assistance for police investigations may also come from business entities and private citizens.

Recommendation #55: Section 3 states that it is "the Board's intent to protect the impartiality of the police service and individual police investigations, while allowing External funding Assistance to enhance or support such investigations". Section 3.e states that the EFA must be "consistent with the principles that core policing functions be public funded". We recommend that the Board add a definition of "core policing functions" to the Definitions section (section 2) of the policy. The inclusions/exclusions implied by this term are not immediately obvious.

Recommendation #56: External funding assistance for police investigations is reported to the board, annually, in an in camera report. Section 4 requires this to report to include "At minimum... all EFA's involving \$25,000.00 or more in direct financial contributions." We recommend the Board consider whether a lower reporting threshold would be appropriate given the potentially sensitive nature of EFA's and their potential, even at low values, to create a perception of partiality.

Recommendation #57: We recommend the Board clearly state what information about external funding assistance be provided in the report. At minimum this should include who provided the funding, the total value of the funding, and how it was used by the Service. The "donations and sponsorships registry" presented to the Vancouver Police Board provides an example.

Recommendation #58: We recommend the Board conducts a thorough examination of external funding policies, particularly in jurisdictions like Vancouver, BC, to ensure adherence to current best practices. This review should aim to optimize the Board's approach to external funding exploring institutional and policy innovations in other jurisdictions.

Typos and other minor comments: "External funding Assistance" (section 3); the definition of EFA refers to "corporate investigations", the definition of EFA in PRP-FN-005 refers only to "investigations".

PRP-FN-005 Funding Assistance Police Programs

Link to policy: <https://www.peelpoliceboard.ca/en/who-we-are/resources/board-policies/PRP-FN-005-External-Funding-Assistance---Public-Police-Programs.pdf>

Last updated: 2014/09/26

See recommendations re: PRP-FN-004.

PRP-FN-006 Found Money

Link to policy: <https://www.peelpoliceboard.ca/en/who-we-are/resources/board-policies/PRP-FN-006-Found-Money.pdf>

Last updated: 2019/06/21

No comments or recommendations at this time

PRP-FN-007 Financial Management Policy

Link to policy: <https://www.peelpoliceboard.ca/en/who-we-are/resources/board-policies/PRP-FN-007-Financial-Management.pdf>

Last updated: 2020/11/27

No comments or recommendations at this time.

PRP-FN-008 Budget Policy

Link to policy: <https://www.peelpoliceboard.ca/en/who-we-are/resources/board-policies/PRP-FN-008-Budget.pdf>

Last updated: 2020/11/27

Recommendation #59: We recommend the Board, by revising the opening policy statement and/or through addition of a Background section, underscore the significance of meaningful budget transparency for fostering not only public trust but also for strengthening the Board’s capacity to ensure adequate and effective policing. By meaningful budget transparency we mean a comprehensive and transparent disclosure of financial information that goes beyond general figures. It should include detailed disaggregation or breakdowns of financial data, enabling the Board and other stakeholders, including the public, to easily understand, analyze, and evaluate how financial resources are being allocated, used, and managed by the Service.

Recommendation #60: Section 3.2.1.a requires an “Operating Budget... be submitted annually to the Board and Council for approval”. Section 3.2.3.a requires the Service to report to the Board annually on “any variance between the approved Operating Budget and actual expenditures, actual revenues, or actual service levels...”. We recommend the Board initiates a comprehensive review assessing the information contained in the operating budget provided to the Board and whether this information is sufficient for it to exercise the full range of its oversight and governance responsibilities.

Recommendation #61: We recommend the Board conduct a parallel examination of the operating budget information made available to the public. This assessment should scrutinize the extent and clarity of the information disclosed to the public and the extent to which it is sufficiently detailed and disaggregated. The Board should explore whether additional details, breakdowns, or explanations could be made accessible to the public as a means of enhancing transparency and public trust, reinforcing the Board’s commitment to open governance and responsible financial stewardship.

Recommendation #62: In line with recommendations 60 and 61, we suggest the Board also consider taking similar steps regarding capital budget (section 3).

PRP-HR-001 Long-Term Disability

Link to policy: <https://www.peelpoliceboard.ca/en/who-we-are/resources/board-policies/PRP-HR-001-Long-Term-Disability.pdf>

Last updated: 2018/11/23

Recommendation #63: Section 1 provides a definition for “long term disability absence” and “short term disability absence” but does not define disability or the term “non-occupational illness” as referred to in the definitions of long and short term disability. The Board may want to add a general definition for disability and/or non-occupational illness.

Recommendation #64: The Board may want to make mention, in the opening policy statement and/or via specific provisions, of the importance of creating a workplace culture that prioritizes the health and well-being of its members and that encourages and supports members claiming long term disability without fear of adverse reactions or repercussions.

PRP-HR-002 Secondary Activities

Link to policy: <https://www.peelpoliceboard.ca/en/who-we-are/resources/board-policies/PRP-HR-002---Secondary-Activities-.pdf>

Last updated: 2024/04/01

The Board should review the law firm's comments on PRP-HR-002.

No comments or recommendations at this time.

PRP-HR-003 Grievance Settlements

Link to policy: <https://www.peelpoliceboard.ca/en/who-we-are/resources/board-policies/PRP-HR-003---Grievance-Settlements.pdf>

Last updated: 2021/03/19

Recommendation #65: The Board may want to make mention, in the opening policy statement and/or via specific provisions, of the importance of creating a workplace culture that prioritizes fairness, accountability, and procedural justice and that encourages and supports members filing grievances without fear of adverse reactions or repercussions.

Recommendation #66: Section 2 requires the Chief to report on an annual basis “an In Camera statistical report outlining the status of all grievances”. Sections 2.i through 2.v detail what should be included in this statistical report. We recommend the Board augment the Chief’s reporting obligation to include an analysis by race, gender, age, and other sociodemographic factors. Ideally, this analysis would extend to both current and historical grievances to facilitate a comprehensive examination of observable trends over time.

PRP-LG-002 Red Light Camera Offences Involving Police Vehicle-Fleet

Link to policy: <https://www.peelpoliceboard.ca/en/who-we-are/resources/board-policies/PRP-LG-002-Red-Light-Camera-Offences-Involving-Police-Vehicle-Fleet.pdf>

Last updated: 2018/11/23

Same as recommendation 37 re: PRP-CP-001.

PRP-LG-003 Delegated Authority

Link to policy: <https://www.peelpoliceboard.ca/en/who-we-are/resources/board-policies/PRP-LG-003-Delegated-Authority.pdf>

Last updated: 2019/09/27

Recommendation #67: Under section 2.1, the Board delegates approval and signing authority to the Chief on all activities listed in section 2.1a through 2.1r. Under section 2.1j, the Board delegates approval and signing authority for all “contracts and agreements of an operational nature in accordance with the Board’s purchasing Policy No. PRP-FN-001. Section 2.1k delegates authority for all “operational protocols between the Board and other agencies covering such areas as the sharing of information, the sharing of resources, and the conduct of police and other investigations”. We recommend the Board review this section of the policy to determine whether or not it is granting too much authority to the Chief on these matters. In conducting this review, we recommend the Board consider the new language about “operations” in the CSPA.

Recommendation #68: Sections 2.1.o and 2.1.p grant approval and signing authority to the Chief on all grievance and human rights minutes of settlements and legal fees with a value of \$100,000 or less. We recommend the Board consider whether it is prudent to lower this threshold.

PRP-LG-004 Complaints of Misconduct

Link to policy: <https://www.peelpoliceboard.ca/en/who-we-are/resources/board-policies/PRP-LG-004---Complaints-of-Misconduct.pdf>

Last updated: 2024/04/01

Recommendation #69: We recommend that the Board revisit and consider reinstating elements of Section 8 (b) of the previous version of this policy which directs the Chief to inform the Board of any serious complains regarding any members, policies, special constables, etc. (especially those involving human rights violations.) Furthermore, we recommend the Board clarify, in this provision or elsewhere in the policy, the criteria for designating a complaint as “serious”.

Recommendation #70: We recommend the Board add a provision Section 6 requiring the Chief to also maintain complete and accurate complaints data disaggregated by race and other sociodemographic factors. Ideally, this analysis would extend to both current and historical complaints to facilitate a comprehensive examination of observable trends over time.

Recommendation #71: Section 11 deals with annual public reporting with regards to public complaints. We recommend the Board add a provision to Section 6 of this policy requiring collection and analysis of race and other sociodemographic factors as part of this reporting. Looking forward, the Board may want to review more closely how this data could be made available in a public-facing dashboard.

Further consideration: As noted earlier in the report, Sections 7 and 9 of the previous version of this policy contained key governance and oversight tools for the Board. The Board may wish to revisit the old policy and incorporate certain elements in the new policy.

PRP-LG-005 Legal Indemnification

Link to policy: <https://www.peelpoliceboard.ca/en/who-we-are/resources/board-policies/PRP-LG-005--Legal-Indemnification---Non-Association-Members.pdf>

Last updated: 2018/10/03

No comments or recommendations at this time.

PRP-LG-006 Legal Indemnification Claims

Link to policy: <https://www.peelpoliceboard.ca/en/who-we-are/resources/board-policies/PRP-LG-006---Legal-Indemnification-Claims.pdf>

Last updated: 2018/11/23

No comments or recommendations at this time.

PRP-LG-007 Misconduct and Discipline

Link to policy: <https://www.peelpoliceboard.ca/en/who-we-are/resources/board-policies/PRP-LG-007---Misconduct-and-Discipline-.pdf>

Last updated: 2024/04/01 (adopted)

Recommendation #72: Given the role that misconduct can play in undermining human rights in policing, we recommend that the Board make explicit mention of human rights in the opening policy statement. For example, the first sentence of the policy statement could be revised to read: “To cultivate and safeguard this trust, it's imperative that the public perceives the Peel Regional Police Service (the “Service”) as being fully committed to **advancing human rights and maintaining** accountability, with unwavering expectations for the highest standards of conduct from all its members”

PRP-LG-008 Internal Complaints Against the Chief or Deputy Chief

Link to policy: <https://www.peelpoliceboard.ca/en/who-we-are/resources/board-policies/PRP-LG-008---Internal-Complaints-Against-Chief-or-Deputy-Chief-.pdf>

Last updated: 2024/04/01 (adopted)

No comments or recommendations at this time.

PRP-OP-001 Community Events Paid Duty

Link to policy: <https://www.peelpoliceboard.ca/en/who-we-are/resources/board-policies/PRP-OP-001-Community-Events-Paid-Duty-.pdf>

Last updated: 2020/02/28

Same as recommendation 37 re: PRP-CP-001.

PRP-OP-002 Alarms

Link to policy: <https://www.peelpoliceboard.ca/en/who-we-are/resources/board-policies/PRP-OP-02-Alarms.pdf>

Last updated: 2018/11/23

No comments or recommendations at this time.

PRP-OP-003 Collection of Identifying Information in Certain Circumstances- Prohibition and Duties

Link to policy: <https://www.peelpoliceboard.ca/en/who-we-are/resources/board-policies/PRP-OP-003---Collection-of-Identifying-Information-.pdf>

Last updated: 2024/04/01

Recommendation #73: We recommend the Board revise the definition of “Prohibited Grounds” (section 1.d) to include “any other ground protected under the Code” to better reflect the dynamic and evolving nature of human rights.

Recommendation #74: We recommend the Board add a definition of “Identifying Information” to the policy.

Recommendation #75: We recommend the Board consider adding the *Charter of Rights and Freedoms* and the *Municipal Freedom of Information and Protection of Privacy Act* as legislative authorities/legislative references.

Recommendation #76: For consistency, the Board may wish to replace its definition of “racial/biased profiling” (section 1.e) with the definition of racial profiling used by the OHRC. The OHRC defines racial profiling as “any action undertaken for reasons of safety, security or public protection, that relies on stereotypes about race, colour, ethnicity, ancestry, religion, or place of origin, or a combination of these, rather than on a reasonable suspicion, to single out an individual for greater scrutiny or different treatment”.

Recommendation #77: Section 3 directs the Chief of Police to “have a Procedure that complies with the duties and obligations imposed by the Regulation and this Policy to ensure there is direction and training provided to officers regarding Regulated Interactions”. Section 12 directs the Chief to implement “mandatory training” concerning the collection of identifying information about an individual. Section 12.c requires a “bias awareness, discrimination, and racism” component in the training program. Section 13 gives the Board power to request access to copies of all training modules related to Regulated Interactions for review. We advise the Board to discuss ways of further strengthening the training requirements associated with Regulated Interactions. For example, by requiring that the Chief provide training that is ongoing and includes a testing component.

Recommendation #78: Sections 15- 18 deal with findings of “disproportionate reporting”. In the event that disproportionate collection is found based on sex, age, racialized group, or a combination, a direct statement is required in the Service’s annual report, a review of practices is required, and the Chief is required to “prepare a report to the Board setting out the results of the review and his or her proposals, if any, to address the

disproportionate attempted collection of information”. We advise the Board to also consider how it might use findings of disproportionate reporting in Chief performance review and compensation related decisions.

Recommendation #79: Section 20 deals with retention, access, and disclosure of data. Section 20.a deals specifically with retention, access, and disclosure of data entered into the database “five or more years ago” and information found to be in non-compliance with the Regulation. We recommend the Board review the OHRC’s recent recommendations to the Toronto Police Service regarding retention, access, and disclosure.⁶⁵

Typos and other minor comments: “Means under the Ontario Human Rights Code means” (Section 1 d Prohibited Grounds),

⁶⁵ <https://www.ohrc.on.ca/en/appendices/appendix-1-recommendations>

PRP-OP-004 Disclosure of COVID-19 Status Information

Link to policy: <https://www.peelpoliceboard.ca/en/who-we-are/resources/board-policies/PRP-OP-04-Disclosure-of-COVID-19-Status-Information.pdf>

Last updated: 2020/04/03

No comments or recommendations at this time.

PRP-OP-005 Body Worn Cameras

Link to policy: <https://www.peelpoliceboard.ca/en/who-we-are/resources/board-policies/PRP-OP-05-Body-Worn-Cameras.pdf>

Last updated: 2021/01/29

Recommendation #80: The opening policy statement lists five public interests to be served by BWCs: enhance public and officer safety; enhance public trust, confidence, and policy transparency and accountability; enhance commitment to bias-free service delivery by police; provide a tool to facilitate early resolution of complaints; provide improved evidence for investigative, judicial, and oversight purposes. We recommend the Board list two additional functions BWCs ought to be servicing: tool for evaluating training, and for evaluating the efficacy of service delivery, including adherence to core principles of human rights.

Recommendation #81: Section 1.15 deals with transparency. The section directs the Chief to “ensure clear instructions are posted externally providing direction for the public on how to obtain policies and procedures governing body worn cameras...”. The Board may wish for the Service to also provide clear information to the public regarding the “Limited Access to Body-Worn Camera Recordings” (Section 1.19-24) – providing transparency with respect to the public disclosure of BWC recordings.

Recommendation #82: Section 1.16 deals with secure retention and disposal of BWC recordings. Section 1.16.c requires the Service to destroy recordings “at the end of their retention period in a secure manner...”. The Board may wish to specify the exact retention period, as well consider whether some recordings should be retained for a longer period of time. The Board may wish to study the Chicago model.

Recommendation #83: Sections 19 through 24 deal with access to BWC recordings. Section 21 establishes that the Chief “may initiate the release to the public of recordings from body-worn cameras, taking into consideration relevant factors, including what is consistent with the law and the public interest, and what is reasonable in the circumstances of the case”. We recommend the Board consider whether it wants to advise proactive disclosure of body-worn camera footage in particular circumstances (after image blurring and voice distortion, as detailed in section 22.a). See Chicago model.

Recommendation #84: Section 25 and 26 deal with auditing. Section 26 states that the Board “shall review this Policy one year after full deployment of the body-worn cameras by the Service, and thereafter at least once every three years, and make any amendments it determines are appropriate...”. Given the rapidly evolving landscape of body-worn cameras we recommend the Board consider shortening this time frame to two years.

Recommendation #85: Section 27 through 29 deal with reporting. Section 27.k directs the Chief, in their annual reporting, to provide the Board with a “review of whether the deployment of body-worn cameras is achieving the purposes set by this Policy, and whether their use remains justified in light of these purposes: i. Use of Force trends over the past five years; ii. Complaints trends over the past five years; and Findings from a survey of a public trust in the Service at a timeframe to be determined after a satisfactory implementation period; and Findings from a consultation with impacted and marginalized communities”. We recommend the Board

Typos and other minor comments: “Elimnate” (policy statement)

PRP-OP-006 Special Investigation Reporting

Link to policy: <https://www.peelpoliceboard.ca/en/who-we-are/resources/board-policies/PRP-OP-006-Special-Investigations-Reporting-.pdf>

Last updated: 2021/11/26

Recommendation #86: Section 2.2.5 and 2.26 deal with the disclosure of Section 34 reports to the public. When no charges are laid, Board policy is for the Chief's Section 34 report to be "placed on the Board's website for public access, upon receipt by the Board". When charges are laid, Board policy is that the report "will not be released to the public until the conclusion of the judicial process...". In both instances, it is recommended that the Board establish clear timelines for when it anticipates the Chief to disclose these reports to the public. For example, within no longer than one week after the finalization of a decision in cases with no charges and with no longer than one week after the conclusion of the judicial process in instances involving criminal charges. We suggest the Board implement a timeline that is as short as practicable.

Recommendation #87: Section 2.2.5 details what information is to be included in the Chief's Section 34 report. We assume the Section 34 report disclosed under 2.2.6 to contain similar details. To maximize clarity, we suggest the Board create a separate subsection detailing what information the Chief is expected to include in Section 34 reports.

PRP-OP-007 Conflict of Interest

Link to policy: <https://www.peelpoliceboard.ca/en/who-we-are/resources/board-policies/PRP-OP-007---Conflict-of-Interest.pdf>

Last updated: 2024/04/01

No comments or recommendations at this time.

PSB-AI-001 Board Procedures

Link to policy: Link not operational at time of writing.

Last updated: 2024/04/26 (adopted)

Recommendation #88: We recommend that the Board modify section 15.2 (d) to reference the “protected grounds” under the Ontario Human Rights Code.

PSB-AI-002 Code of Conduct for Board Members

Link to policy: <https://www.peelpoliceboard.ca/en/who-we-are/resources/board-policies/PSB-AI-002---Code-of-Conduct-for-Board-Members.pdf>

Last updated: 2024/04/01(adopted)

No comments or recommendations at this time.

PSB-AI-003 Political Relationships

Link to policy: <https://www.peelpoliceboard.ca/en/who-we-are/resources/board-policies/PSB-AI-003-PoliticalRelationships.pdf>

Last updated: 2015/09/25

No comments or recommendations at this time.

PSB-AI-004 Media Relations

Link to policy: <https://www.peelpoliceboard.ca/en/who-we-are/resources/board-policies/PSB-AI-004-Media-Relations.pdf>

Last updated: 2018/10/03

No comments or recommendations at this time.

PSB-AI-005 Using Board Resources During an Election Period

Link to policy: <https://www.peelpoliceboard.ca/en/who-we-are/resources/board-policies/PSB-AI-005-Use-of-Board-Resources-During-an-Election-Period.pdf>

Last updated: 2018/04/20

No comments or recommendations at this time.

PSB-AI-006 Board Member Badges

Link to policy: <https://www.peelpoliceboard.ca/en/who-we-are/resources/board-policies/PSB-AI-002---Code-of-Conduct-for-Board-Members.pdf>

Last updated: 2023/12/15 (adopted)

No comments or recommendations at this time.

PSB-FN-001 Board Expenses and Travel

Link to policy: <https://www.peelpoliceboard.ca/en/who-we-are/resources/board-policies/PSB-FN-001-Board-Expenses--Travel.pdf>

Last updated: 2014/09/26

No comments or recommendations at this time.

PSB-FN-002 Community Support and Recognition Fund

Link to policy: <https://www.peelpoliceboard.ca/en/who-we-are/resources/board-policies/PSB-FN-002-Community-Support-and-Recognition-Fund.pdf>

Last updated: 2018/11/23

Recommendation #89: The opening policy statement states that the CSRF fund is to “be used to support and encourage participation of members of Peel Regional Police and the citizens of Peel Region in policing initiatives that promote positive community partnerships and enrich the quality of life in Peel Region, and advance the Goals of the Board”. We advise the Board to explore whether it would be appropriate to earmark a portion of these funds for advancing human rights and addressing the impacts of systemic racism.

Recommendation #90: Section 2 lists five funding priorities for the Community Support and Recognition Fund. We recommend the Board add human rights initiatives as a sixth funding priority.

Typos and other minor comments: “avaiable” (section 4.c); policy sections are misnumbered, jumps from section 2 to section 4.

PSB-FN-003 Rewards Policy

Link to policy: <https://www.peelpoliceboard.ca/en/who-we-are/resources/board-policies/PSB-FN-003--Rewards.pdf>

Last updated: 2018/11/23

No comments or recommendations at this time.

PSB-HR-001 Civilian Long Services Awards

Link to policy: <https://www.peelpoliceboard.ca/en/who-we-are/resources/board-policies/PSB-HR-001-Civilian-Long-Service-Awards.pdf>

Last updated: 2017/09/29

No comments or recommendations at this time.

PSB-FN-003 Succession Planning

Link to policy: <https://www.peelpoliceboard.ca/en/who-we-are/resources/board-policies/PSB-HR-003--Succession-Planning.pdf>

Last updated: 2018/11/23

Typos and other minor comments: “desingated” (section 2)

PSB-FN-004 Board Member Recognition

Link to policy: <https://www.peelpoliceboard.ca/en/who-we-are/resources/board-policies/PSB-HR-004--Board-Member-Recognition.pdf>

Last updated: 2017/09/29

No comments or recommendations at this time.

PSB-FN-007 Acting Appointments - Executive Positions

Link to policy: <https://www.peelpoliceboard.ca/en/who-we-are/resources/board-policies/PSB-HR-007-Acting-Appointments---Executive-Positions.pdf>

Last updated: 2019/06/21

Typos and other minor comments: “ot” (section 1.3)

PSB-LG-001 Operation Service Agreements

Link to policy: <https://www.peelpoliceboard.ca/en/who-we-are/resources/board-policies/PSB-LG-001-Operational-Service-Agreements.pdf>

Last updated: 2013/09/27

Recommendation #91: We recommend the Board review and revise this policy in light of John Morden’s recommendations following the G20 summit in Toronto. “Major events” and “emergency situations” in particular as defined in this policy fit Morden’s definition of a “critical point” in which the Board should have more involvement in operational matters. As Morden writes: “Where a ‘critical point’ exists, the chief of police should provide the Board with an operational briefing that outlines the broad contours of the operation/event/issue, highlights the existing Board policies, if any, that may apply, and generally ensures that the Board is informed of what is going to take place. If the Board has knowledge of a ‘critical point’, it can discharge its important governance role by analyzing the policy framework that may apply to the operation/event/issue and determine whether there exists a policy vacuum in that policy framework that must be filled” (p. 90).

New policies

Recommended Policy #1: We recommend the Board reintroduce a policy or policies addressing the Chief's performance evaluation and compensation. The Chief's performance evaluation and compensation are crucial components of effective Board governance and oversight. It is essential for the Board to exercise its authority over the Chief, ensuring his or her performance aligns with the strategic objectives and standards set by the Board, and allowing the Board to systematically assess the Chief's effectiveness, competence, and adherence to organizational goals.

Recommended Policy #2: We recommend the Board develop a public consultation policy, using the Ottawa Police Board's policy as a potential model. A robust public consultation policy is pivotal in enhancing engagement and decision-making processes. The policy should provide a foundational understanding of when and why public input is sought, describe methods of consultation, formalize timelines and notification procedures, and articulate a commitment to making consultations accessible and inclusive. Additionally, this policy should underscore the necessity of ongoing communication throughout the consultative process. Meaningful public engagement requires transparent and ongoing communication, including a commitment by the Board to explain to the community how their input will be incorporated into decision-making processes. If input is not used, the Board should be prepared to explain this as well.

Recommended Policy #3: We recommend the Board create a policy that defines "critical points", consistent with John Morden's recommendation for police boards in 2012 following the G20 Summit.

Appendix A

While these examples offer valuable insights, it is important to emphasize that the PPSB and PRP are actively engaged in similar initiatives and, in many instances, are surpassing the efforts of other jurisdictions. The examples provided below are intended as additional points of reference rather than as an assessment of the Board or PRP's actions to date.

Preliminary scan of existing human rights-focused initiatives in Canadian municipal police services

Municipal police services across Canada play a critical role in promoting and protecting human rights in our communities, and in recent years, there have been important steps taken to promote human rights in policing. From the creation of advisory committees and human rights projects to the development of policies and procedures promoting human rights - this scan highlights some of the different types of initiatives undertaken by municipal police services to promote human rights in Canadian policing.

To conduct this scan, an inventory of Canadian municipal police services was created, and a high-level examination of service and board websites was conducted by a member of the research team in search of any information relevant to human rights.

The scan is preliminary and was not intended to be comprehensive in scope. There are many other initiatives that could be included in a future more in-depth and systematic search, review, and analysis.

Statements of commitment

Many police services throughout Canada have released statements expressing their commitment to addressing human rights concerns in their work. For example, in a statement of commitment on their website, the Hamilton Police Service declared, "The Service is committed to fostering a strong culture of human rights and inclusiveness in policing in Hamilton."⁶⁶

In September 2020, the Calgary Police Service (CPS) released a statement affirming its commitment to addressing systemic racism in the CPS. The CPS's Executive Leadership Team expressed their dedication to this cause by stating, "We, the Calgary Police

⁶⁶ Hamilton Police Service, "Human Rights in Policing in Hamilton | Hamilton Police Service," accessed February 21, 2023, <https://hamiltonpolice.on.ca/about/human-rights-policing-hamilton>.

Service, acknowledge that systemic racism, discrimination, and marginalization exist in our Service and manifests in how we deliver services to the community. It also has a deep impact on our employees. It demands our immediate, meaningful action, and today, we commit to leading a transformational culture change at CPS.”⁶⁷

The mission statement on the Brockville Police Service’s website states that “the Police Service affirms and supports its intention for and adherence to the principles of equity and fairness embodied in the Canadian Charter of Rights and Freedoms, the Ontario Human Rights Code, and the Police Services Act... and the principle of continuous improvement and education of members of the Police Service.”⁶⁸

In a press release for *The Power of One Exhibit* by the Abraham Global Peace Initiative, the Halton Regional Police Service released a statement committing “to eliminating hate, racism, and discrimination of any kind, and to promoting respect, equity, and inclusivity, in Halton and beyond. Hosting this exhibit is one of many initiatives that support the Service’s ongoing commitment to raising anti-hate awareness in our community.”⁶⁹

As part of their broader commitment to addressing systemic racism in the service, the Calgary Police Service has committed to reviewing and modifying their use of force, school resource officer program, and street checks policies and procedures.⁷⁰

Community advisory committees

The Toronto Police Services Board formed an Anti-Racism Advisory Panel in April 2018.⁷¹ The initial iteration of the ARAP was composed of 29 members, with 22 community members representing diverse backgrounds such as lawyers, academics, philanthropists, and business owners.⁷² The remaining seven members of the ARAP were representatives of the TPS.⁷³ The ARAP’s mandate is to advise and support the TPSB in relation to policing and racism, anti-Black racism, and anti-Indigenous racism, including identifying issues relating to racism, developing and/or recommending policies,

⁶⁷ Calgary Police Service, “The Calgary Police Service Commitment to Anti-Racism, Equity & Inclusion” <https://pub-calgary.escribemeetings.com/filestream.ashx?DocumentId=138584>

⁶⁸ Brockville Police Service, “Mission Statement,” February 26, 2015, <https://brockvillepolice.com/about-bps/mission-statement/>.

⁶⁹ Halton Police Service, “The Halton Regional Police Service Is Proud to Host ‘The Power of One’ Exhibit,” November 17, 2021, <https://www.haltonpolice.ca/en/news/the-halton-regional-police-service-is-proud-to-host-the-power-of-one-exhibit.aspx>.

⁷⁰ Calgary Police Service, “The Calgary Police Service Commitment to Anti-Racism, Equity & Inclusion,” n.d., <https://pub-calgary.escribemeetings.com/filestream.ashx?DocumentId=138584>.

⁷¹ Toronto Police Services Board, “Toronto Police Services Board - Anti-Racism Advisory Panel” accessed February 28, 2023, <https://www.tpsb.ca/advisory-panels/24-panels-and-committees/94-arap>.

⁷² Toronto Police Services Board - .

⁷³ Toronto Police Services Board - .

strategies, and action plans for approval by the board, monitoring the implementation of the TPSB's Race-Based Data Collection, Analysis, and Public Reporting Policy, including reviewing the data analysis and any interventions developed by the TPS to address racial disparities for feedback and making recommendations for enhancement, and reviewing the development and implementation of all TPS training and offering recommendations for enhancement, including training on anti-racism.⁷⁴

In October 2020, the Calgary Police Service established an Anti-Racism Action Committee (ARAC) to spearhead the creation of a Community-Based Anti-Racism Strategy.⁷⁵ The ARAC, in collaboration with CPS Administration and external consultants Habitus Collective and Action Dignity, has been actively identifying effective measures to combat racism within CPS programs and services, while also leveraging existing efforts in the Calgary community.⁷⁶

The ARAC is divided into two subcommittees, one internal and the other external. The External ARAC is made up of 15 local community members who have either experienced racism firsthand or have professional, academic, or cultural expertise in anti-racism-related work.⁷⁷ Their key responsibilities include advising on the development of the community-based anti-racism strategy, identifying systemic barriers to accessing police programs and services, identifying opportunities to collaborate with community partners and organizations to address structural racism on a community-wide level, and many other related tasks.⁷⁸

The Internal ARAC is made up of a diverse group of Calgary Police Service members, with 70 percent being sworn members and 30 percent being civilian members, all of whom bring unique personal and professional experiences to the CPS.⁷⁹ The Internal ARAC's responsibilities include helping the External ARAC identify what is working well and where some issues may be, as well as advising on how the Internal ARAC can improve their systems and work culture to address systemic racism and discrimination.⁸⁰

Race-based data collection

⁷⁴ Toronto Police Services Board -

⁷⁵ Calgary Police Service, "CPS ARAC," accessed February 21, 2023, <https://www.cps-arac.ca/>.

⁷⁶ Calgary Police Service.

⁷⁷ Calgary Police Service, "CPS ARAC."

⁷⁸ Calgary Police Service.

⁷⁹ Calgary Police Service.

⁸⁰ Calgary Police Service.

The TPSB and its ARAP co-developed a *Race-Based Data Collection, Analysis, and Public Reporting* policy in September 2019.⁸¹ The TPSB is not the only service that has implemented policies concerning the collection of data based on race. Other municipal police services, such as the Calgary Police Service⁸², Ottawa Police Service⁸³, and the Waterloo Regional Police⁸⁴ have adopted similar policies aimed at collecting and analyzing race-based data. The purpose of these policies is to use race-based data collection, analysis, and public reporting to identify, monitor, and eradicate systemic racism and racial bias in service delivery, recognize and promote equitable service delivery practices, and improve trend analysis, professional development, and public accountability.⁸⁵

Public consultation

The Ottawa Police Services Board's Public Consultation policy acknowledges "the importance of well-conceived external communications and consultation to provide the Board and Service with critical insight into public attitudes and expectations".⁸⁶ The policy has several objectives, including addressing the impacts of OPS decisions on the community, keeping the OPS informed about public opinion and community perspectives, and enhancing the quality of OPS decisions making.⁸⁷

From June to October 2021, the SPS and SPB conducted an extensive community consultation project comprising three components: a community survey, stakeholder interviews, and focus groups.⁸⁸ More than 1,220 residents of Surrey were consulted as part of this project, and the feedback received was used as the basis for the SPS's inaugural strategic plan, published in 2022.⁸⁹ The strategic plan identified three primary areas of focus: organizational development, employee development and wellness, and community policing model development.⁹⁰

⁸¹ Toronto Police Services Board, "Toronto Police Services Board - Race-Based Data Collection, Analysis and Public Reporting," accessed February 28, 2023, <https://www.tpsb.ca/policies-by-laws/board-policies/177-race-based-data-collection-analysis-and-public-reporting>.

⁸² Calgary Police Service, "CPS ARAC."

⁸³ Ottawa Police Service, "Use of Force Incident Report," 2020, <https://www.ottawapolice.ca/en/who-we-are/resources/Documents/Reports-and-Publications/2020-Use-of-Force-Independent-Report-E.pdf>.

⁸⁴ Waterloo Regional Police, "Waterloo Regional Police Make Open Call for Academic Partnership for Race-Based Data Collection," May 18, 2021, <https://www.wrps.on.ca/en/news/waterloo-regional-police-make-open-call-for-academic-partnership-for-race-based-data-collection.aspx>.

⁸⁵ Toronto Police Services Board.

⁸⁶ Ottawa Police Service Board.

⁸⁷ Ottawa Police Service Board.

⁸⁸ Surrey Police Service.

⁸⁹ Surrey Police Service, "Strategic Plan Final Version 2022," n.d., <https://www.surreypolice.ca/sites/surreypolice/files/media/documents/Strategic%20Plan%20Final%20Version%202022-02-07.pdf>.

⁹⁰ Surrey Police Service.

Training

The Fair and Impartial Policing Procedure of the London Police Service requires regular delivery and an annual review of education on bias recognition for all LPS members.⁹¹ This training aims to promote accountability, support equitable and fact-based decision-making, preserve police legitimacy, and maintain public trust.⁹²

In 2020, the Edmonton Police Service (EPS) introduced bias awareness training across the EPS.⁹³ Projects currently underway at EPS include the *Unconscious Bias E-Learning Module*, which is mandatory for all patrol officers and will soon be extended to all sworn and civilian members.⁹⁴ This introductory module was developed in collaboration with representatives of marginalized and underserved communities and is aimed at enhancing police officers' understanding of unconscious bias and its implications everyday policing.⁹⁵ Additionally, there is the *LGBTQ2S+ Acceptance Training*, which provides officers with strategies to respectfully communicate and build rapport with individuals who identify members of the LGBTQ2S+ community, to promote their safety and well-being.⁹⁶ Lastly, there is the *Inclusive Language Guide*, which aids EPS members in using appropriate language and terminology when interacting with marginalized and underserved communities, to foster inclusivity and respect.⁹⁷

Community policing

The Edmonton Police Service's Equity, Inclusion, and Human Rights (EIHR) Branch,⁹⁸ the Thunder Bay Police Service's Community Inclusion Team,⁹⁹ and the Vancouver Police Department's 2SLGBTQ+ Liaison Officer¹⁰⁰ are examples of human rights-oriented community policing programs.

⁹¹ London Police Service, "Fair and Impartial Policing Procedure - London Police Service," accessed February 21, 2023, <https://www.londonpolice.ca/en/about/fair-and-impartial-policing-procedure.aspx>.

⁹² London Police Service.

⁹³ Edmonton Police Service, "Bias Awareness Training Incorporated across EPS," accessed March 18, 2023, <https://www.edmontonpolice.ca/News/SuccessStories/BiasAwarenessTraining>.

⁹⁴ Edmonton Police Service.

⁹⁵ Edmonton Police Service.

⁹⁶ Edmonton Police Service.

⁹⁷ Edmonton Police Service.

⁹⁸ Edmonton Police Service, "Equity, Inclusion, and Human Rights Branch," accessed February 21, 2023, <https://www.edmontonpolice.ca/CommunityPolicing/CommunityInitiatives/EIHRBranch>.

⁹⁹ Thunder Bay Police Service, "Community Inclusion Team | Thunder Bay," accessed March 19, 2023, <https://thunderbaypolice.ca/breaking-barriers/community-inclusion-team>.

¹⁰⁰ Vancouver Police Department, "Diversity - Vancouver Police Department," accessed February 28, 2023, <https://vpd.ca/community/diversity/>.

The EIHR Branch of the Edmonton Police Service is dedicated to promoting equitable access to appropriate services for all Edmontonians, regardless of their identity factors such as race, gender identity and expression, sexual orientation, and religion.¹⁰¹ The EPS's EIHR Branch organizes listening sessions to encourage community members, partners, and stakeholders to engage in discussions.¹⁰² Through this process, the EPS has implemented numerous changes within the service, such as its bias awareness training module.¹⁰³ The EIHR Branch has a Community Relations sections that works closely with all communities to enhance the policies, procedures, and practices of the Edmonton Police Service, with the aim of better serving and supporting local needs.¹⁰⁴

The goal of the Thunder Bay Police Service's Community Inclusion Team (CIT) is to build positive relationships with local Indigenous and racialized people in the community.¹⁰⁵ The CIT's mission is to strengthen these relationships through positive interactions, empowering individuals, investing in partnerships, constant communication, and education to increase understanding and acceptance to make the TBPS more welcoming and accessible to all communities.¹⁰⁶ The CIT operates on four pillars: engage, support, recruit, and communicate.¹⁰⁷ The CIT engages by consulting with Indigenous people and other racialized and underrepresented groups to understand barriers, consider service needs, and further reconciliation.¹⁰⁸ The CIT supports by investing in training new Provincial Liaison Team members to ensure lines of communication and understanding are maintained throughout interactions with Indigenous people and diverse groups in major events, demonstrations, and disputes.¹⁰⁹ The CIT recruits by developing opportunities to volunteer at the TBPS or partner with a mentor to successfully prepare for the hiring process.¹¹⁰ Lastly, the CIT communicates by using social media to document and highlight ongoing work by the CIT and prepare quarterly and annual reports to ensure the team is on track with the plan.¹¹¹

¹⁰¹ Edmonton Police Service, "Equity, Inclusion, and Human Rights Branch."

¹⁰² Edmonton Police Service.

¹⁰³ Edmonton Police Service.

¹⁰⁴ Edmonton Police Service, "Community Relations Section," accessed March 19, 2023, <https://www.edmontonpolice.ca/CommunityPolicing/CommunityInitiatives/CRSUnit>.

¹⁰⁵ Thunder Bay Police Service, "Community Inclusion Team | Thunder Bay."

¹⁰⁶ Thunder Bay Police Service.

¹⁰⁷ Thunder Bay Police Service.

¹⁰⁸ Thunder Bay Police Service.

¹⁰⁹ Thunder Bay Police Service.

¹¹⁰ Thunder Bay Police Service.

¹¹¹ Thunder Bay Police Service.

The Vancouver Police Department's 2SLGBTQ+ Liaison Officer was created in 2017 to collaborate with various groups within the 2SLGBTQ+ community.¹¹² This role has three primary functions, including providing continuous cultural sensitivity training to VPD personnel on matters relating to the 2SLGBTQ+ communities, facilitating the resolution of issues that affect members of the 2SLGBTQ+ community, and offering support to other law enforcement agencies regarding 2SLGBTQ+ matters.¹¹³ Additionally, the Liaison Officer works closely with 2SLGBTQ+ community groups and organizations and oversees the Safe Place Program.¹¹⁴ This ongoing initiative involves reaching out to local businesses and institutions and providing them with Safe Place window decals to signify their premises as a place of safety for anyone feeling unsafe.¹¹⁵

The Edmonton Police Service launched a *Know Your Rights Campaign*¹¹⁶ and the Ottawa Police Service launched a *Human Rights Learning Forum*.¹¹⁷ The EDS's Know Your Rights campaign is intended to inform individuals about their legal rights.¹¹⁸ As the EPS announced: "This campaign reflects our Service's commitment to inclusion and our mission to educate the public on their rights, while also working to cultivate a mutual understanding between individuals and officers regarding their rights and responsibilities."¹¹⁹

The OPS held its first *Human Rights Learning Forum* in 2015. The forum is a collaboration between the Service and local community groups aimed at fostering a discussion of human rights and equity, diversity, and inclusion issues in the context of policing.¹²⁰ The forum has become an annual event.¹²¹

Charters

A Charter is a document that outlines the purpose, values, and principles of an organization, serving as a foundational framework to guide decision-making and actions, while providing a clear understanding of the organization's goals and values that should

¹¹² Vancouver Police Department, "Diversity - Vancouver Police Department."

¹¹³ Vancouver Police Department, "Community Matters," n.d., <https://vpd.ca/wp-content/uploads/2022/07/2022-Community-Matters.pdf>.

¹¹⁴ Vancouver Police Department.

¹¹⁵ Vancouver Police Department.

¹¹⁶ Edmonton Police Service, "EPS Launches Know Your Rights Campaign," accessed March 19, 2023, <https://www.edmontonpolice.ca/News/SuccessStories/KnowYourRightsCampaignLaunch>.

¹¹⁷ Ottawa Police Service, "Human Rights Learning Forum," December 8, 2022, <https://www.ottawapolice.ca/en/community-safety-and-crime-prevention/human-rights-learning-forum.aspx>.

¹¹⁸ Edmonton Police Service, "EPS Launches Know Your Rights Campaign."

¹¹⁹ Edmonton Police Service.

¹²⁰ Ottawa Police Service, "Human Rights Learning Forum."

¹²¹ Ottawa Police Service.

govern its activities. While a policy provides specific guidelines for achieving an organization's objectives, a Charter sets out the principles and values that an organization aspires to uphold. Recently, human rights-focused Charters were created by the Toronto Police Service and the Windsor Police Service.

The Toronto Police Service established its Charter in collaboration with the Ontario Human Rights Commission in 2007. The Charter was developed specifically in response to concerns about racial profiling.¹²² The Charter outlines two general “change objectives.” The first is to identify and eliminate any discrimination that may exist in the employment policies of the Toronto Police Services Board and the practices of the Toronto Police Service that may be contrary to the Ontario Human Rights Code.¹²³ The second is to identify and eliminate any discrimination that may exist in the provision of policing services by the Toronto Police Service that may be contrary to the Ontario Human Rights Code.¹²⁴ Stemming from these two objectives, the Charter identified target objectives and possible change initiatives in four areas: (1) recruitment, selection, and promotion; (2) training; (3) accountability; and (4) public education.¹²⁵ The Diversity Institute at Ryerson University was contracted to evaluate the Charter in December 2010.¹²⁶

In 2011, the Windsor Police Service (WPS), the Windsor Police Services Board (WPSB), the Ontario Human Rights Commission (OHRC), and the Ontario Police College (OPC) launched a Charter addressing policing and human rights issues in Windsor.¹²⁷ The Charter had two specific goals: to identify and eliminate discriminatory employment policies of the WPSB and practices of the WPS that may contravene the Ontario Human Rights Code, and to identify and eliminate any discrimination that may exist in the provision of policing services by the WPS to the residents of Windsor.¹²⁸ The Charter also identified target objectives and possible change initiatives in four areas, namely: (1) recruitment, selection, promotion, and retention; (2) accommodation; (3) accountability; and (4) public liaison.¹²⁹ Researchers at York University were contracted to evaluate the WPS’s Charter in October 2014.¹³⁰

¹²² Ryerson University Diversity Institute, *Evaluation of the Human Rights Project Charter*, 2014, https://www.tps.ca/media/filer_public/6a/62/6a62f95b-29ff-4740-8c43-7f2557441113/hrpc_evaluation_report_2014.pdf.

¹²³ Ryerson University Diversity Institute.

¹²⁴ Ryerson University Diversity Institute.

¹²⁵ Ryerson University Diversity Institute.

¹²⁶ Ryerson University Diversity Institute.

¹²⁷ Dr. Lorne Foster and Dr. Lesley Jacobs, “Windsor Police Service Human Rights Project,” October 2015, https://windsorpolice.ca/about/human-rights/Documents/Final%20REPORT_Foster_Jacobs%20January%202016.1.pdf.

¹²⁸ Foster and Jacobs.

¹²⁹ Foster and Jacobs.

¹³⁰ Foster and Jacobs.

Appendix B

In October 2020, the PRP and PPSB entered a Memorandum of Understanding (MOU) with the OHRC. The MOU commits the PRP and PPSB creating and implementing legally binding measures aimed at addressing and eliminating systemic racism in policing, improving transparency and accountability, and strengthening trust between the police and Black, Indigenous, and other racialized communities in Peel Region.

The remedies proposed by the OHRC are based on its *Policy on eliminating racial profiling in law enforcement* and incorporate seven key principles:

- acknowledgement of racial profiling;
- engagement with affected communities;
- policy guidance;
- race-based data collection;
- monitoring and accountability;
- organizational change; and
- multi-year action plans.

PRP and PPSB have committed to these principles, recognizing the need for significant shifts in both the culture and practices of policing in Peel Region to address systemic racism.

A core element of the Human Rights Project is robust community engagement, with a commitment from PRP and PPSB to consult Black, Indigenous, and other racialized groups to ensure their experiences and perspectives shape the development and implementation of the final remedies. This includes exploring ways to reduce the reliance on police for social service needs, such as mental health and homelessness, and reinvesting in community-based support systems.

The initiative represents a significant step toward police reform in Peel Region, with the goal of creating safer, more equitable outcomes for all residents.

Appendix C

Public Consultation

Public consultation is an important aspect of policing as it helps to ensure that the police are accountable to the community they serve. By engaging with the public, the police can gain a better understanding of the needs and concerns of the community, which can help to build trust and legitimacy. This is essential for maintaining public safety, as a community that trusts and supports the police is more likely to report crime and cooperate with investigations. By engaging with the community, the police can work to address issues of racism and discrimination within the department, which can help to promote fairness and equity in policing. Public consultation is an important aspect of democracy as it allows citizens to have a say in how they are policed, which helps to ensure that policing practices are consistent with the values of the community.

There are many different models of public consultation that can be employed. Some examples include traditional public meetings, surveys and questionnaires, community engagement groups, online forums and social media, community policing, community budgeting, and citizens' assemblies:

- **Traditional public meetings** involve holding meetings open to the public where citizens can voice their opinions and concerns, which can be done in person or virtually.
- **Surveys and questionnaires** involve distributing surveys or questionnaires to a representative sample of the community to gather feedback on a specific topic or issue.
- **Community engagement groups** involve forming a group of representatives from the community to provide input and feedback on a regular basis.
- **Online forums and social media** involve using digital platforms to engage with the community and gather feedback on different issues.
- **Community policing** involves the police actively engaging with the community to build relationships and trust, and to identify and solve problems affecting the local community.
- **Community budgeting** involves giving citizens the opportunity to participate in the budget-making process by allowing them to identify priorities, allocate resources and make decisions.
- **Citizens' assemblies** involve randomly selecting a representative sample of citizens to come together and deliberate on a specific issue or policy, they are empowered to make recommendations to government on the issue.

Another style of public consultation that we wish to highlight, as there is specific interest from the board in this model, is what we will refer to as a **hearing-style consultation**. A hearing style public consultation is a type of public consultation where individuals or

groups are given the opportunity to present their opinions, concerns, or recommendations on a specific issue or proposal, to a panel of decision-makers. The panel can include representatives from government agencies, experts, community leaders, and other stakeholders.

During a hearing-style consultation, the panel will listen to the presentations and may ask questions or seek clarification from the presenters. The presentations may be given in person or remotely. The panel will also provide an opportunity for members of the public to attend the hearing, observe and provide written comments, if they are not able to present. A hearing-style consultation typically lasts for several days and may include multiple sessions. It may also include a period for written submissions or comments to be submitted by the public or other stakeholders prior or after the hearing. A hearing-style public consultation can be useful when complex issues are being considered, and there are a large number of stakeholders with different perspectives. It provides an opportunity for all parties to provide detailed information and expert testimony to support their positions, and for decision-makers to hear directly from the community and other stakeholders.

Below are some key considerations concerning how best to organize a hearing-style public consultation:

- **Define the scope and objectives of the consultation:** Clearly outline the issues that will be addressed during the consultation and the goals that the committee hopes to achieve.
- **Identify and invite stakeholders:** Identify key stakeholders, including community members, experts, and other relevant groups, and invite them to participate in the consultation.
- **Develop an agenda:** Create an agenda that outlines the schedule of presentations, the topics that will be covered, and the rules of the hearing.
- **Coordinate logistics:** Arrange for a suitable location for the hearing and ensure that it is accessible for all stakeholders. Coordinate with the venue staff to ensure that the technical and logistical requirements are met.
- **Communicate with stakeholders:** Keep stakeholders informed about the consultation process, including the schedule, location, and any changes to the agenda. Send out reminders about the consultation, and make sure that the information is available in different languages, if needed.
- **Encourage public participation:** Encourage members of the public to attend the hearing and provide an opportunity for them to provide written comments or ask questions.
- **Record the consultation:** Record the consultation, either through audio or video, to ensure that the proceedings can be reviewed and analyzed later.

- **Follow-up:** After the consultation, provide a summary of the proceedings, and report on the outcomes to the stakeholders. Follow up with the stakeholders on the progress of the recommendations or decisions made.
- **Evaluate the process:** Reflect on the consultation process and identify areas for improvement in future consultations.

Carefully considering and planning around these different items will be key to ensuring that the consultation is well-organized, inclusive, and productive for all stakeholders, including the Governance & Human Rights Committee.

Some additional considerations

Each model – and there are many others – has its own advantages and disadvantages. It is therefore up to the police board/service to select the most appropriate method for their specific needs and context. When selecting a model, it is critical to distinguish between more legitimate forms of consultation built on ideas about inclusive engagement and meaningful dialogue and those that are carried out with no real intention of engaging in meaningful discourse or implementing the outcomes. Despite good intentions, many attempts at public consultation in both government and business fall into the second group. Meaningful consultation is inclusive, it is transparent, it is ongoing, it well-design and resourced, it is based on a two-way exchange of information between those hosting the consultation (e.g., police board) and those attending (i.e., community members), and it is rooted in a genuine desire to involve members of the community in decision-making processes by taking their views, ideas, and concerns into account.

Below are some additional reflections on public consultation:

- **When to consult:** Public feedback can be gathered at several points of a consultative process, including the brainstorming stages when new policy ideas are being considered, when a policy proposal is in its early stages, and when the public is being involved in monitoring and evaluating policies. These discussions may occur in person, for instance, through face-to-face focus groups, workshops, or public gatherings. They can also occur online, for example, in fora that permit user feedback or discussion of a proposed policy or program.
- **Inclusivity:** Consultations should be created to be as inclusive as possible. This entails minimizing consultative processes' complexity and maximizing accessibility. Everyone should be afforded the opportunity to participate, regardless of their background or level of competency. All stakeholders must be given equal opportunity to engage in discussions, especially those from disadvantaged and marginalized groups. The capture of a consultative process by those with the most influence, resources, and technical know-how must be prevented at all costs. Maximizing chances for people with relevant lived

experience should be a priority when conducting consultations on matters of policing and police policy. During consultative processes, existing power relations based on race, gender, age, class, and other social distinctions must be actively managed to ensure that everyone has an equal opportunity to speak and be heard.

- **Getting the word out:** People must be informed that consultations are being held for them to participate. This may seem like a no-brainer, but governments all-too-frequently fail to take the notification stage of public consultations seriously. It is important to spread word about public consultations in different ways because not all individuals may have access to or be aware of traditional forms of communication, such as newspapers or television. By using a variety of methods to reach the public, such as social media, community meetings, and translated materials, more individuals will have the opportunity to learn about and participate in the consultation process. Additionally, different methods of communication may appeal to different individuals and communities, increasing the diversity of participation and perspectives in the consultation process.
- **Publicizing the results:** Sharing the results of a consultative process with the public is essential for several reasons. Firstly, it allows for transparency and accountability, ensuring that the public is informed about the outcome of their participation and the actions that have been taken as a result. It also allows for the public to understand the reasoning behind decisions that have been made, and to provide feedback on the consultation process itself. Additionally, sharing the results of a consultative process with the public can help to build trust and engagement with the community, as it demonstrates that their input has been taken into consideration and valued. Furthermore, sharing the results can also help to identify any potential issues or areas for improvement for future consultations.
- **Monitoring and evaluating progress:** Institutionalizing a process for monitoring and evaluating progress that is being made on what was learned and decided in a consultation process is important for several reasons. Firstly, it allows for the accountability of those responsible for implementing the decisions made during the consultation. By regularly monitoring and evaluating progress, it ensures that progress is being made in a timely manner and that any issues or barriers can be identified and addressed early on. This can also help to ensure that the outcomes of the consultation are aligned with the needs and concerns of the community. Secondly, it allows for the identification of areas of success and areas for improvement in the consultation process itself. This can help to make future consultations more effective and responsive to the needs of the community. Lastly, monitoring and evaluating progress can also help to demonstrate the impact of the consultation process to the community and other stakeholders, which can increase the community's trust and engagement in the process.

Further reading

Tina Nabatchi and Matt Leighninger's *Public participation for 21st century democracy* (John Wiley & Sons, 2015)

International Association of Chiefs of Police's "[Community engagement and dialogue](#)" and "[Community member feedback as an effective tool for building and maintaining trust](#)".

Institute for Local Government's "[Broadening public participation using online engagement tools](#)" and "[Principles of local government public engagement](#)"

Organisation for Economic Co-operation and Development's "[Background on public consultation](#)"