



Ontario
Human Rights Commission
Commission ontarienne des
droits de la personne



Work plan to eliminate racial profiling and racial discrimination between the Peel Regional Police, Peel Police Services Board and the Ontario Human Rights Commission.

RECOMMENDATIONS

The following recommendations to the Peel Regional Police (“PRP”) follow the principles set out in the Ontario Human Rights Commission’s (“OHRC”) Policy on Eliminating Racial Profiling in Law Enforcement.¹ In September 2019, the Ontario Association of Chiefs of Police committed to the seven key principles identified in the OHRC’s Policy on Eliminating Racial Profiling in Law Enforcement as the basis for preventing and addressing racial profiling in law enforcement.²

1. [Acknowledgement](#): acknowledge reality of racial profiling, and impact on trust
2. [Engagement](#): active and regular engagement
3. [Policy Guidance](#): appropriate standards, guidelines, policies
4. [Data Collection](#): demographic data to identify disparities
5. [Monitoring and Accountability](#)
6. [Organizational Change](#): training, culture, hiring
7. [Multi-Year Action Plan](#): anti-racism action plans with clear targets

Additional detail on the adoption and implementation of each principle is below. These recommendations reflect research and consultations with PRP’s Anti-Racism Advisory Committee and community feedback.

¹ Ontario Human Rights Commission, *Policy on eliminating racial profiling in law enforcement*, online: <http://www.ohrc.on.ca/en/policy-eliminating-racial-profiling-law-enforcement>.

² “Ontario police services depend on the public’s trust and confidence to effectively serve their communities. It is important that all law enforcement personnel deliver policing services in a fair and respectful manner,” said Chief Paul Pedersen, OACP President. “The OACP is committed to the seven key principles outlined in the OHRC’s Policy as the basis for preventing and addressing racial profiling in law enforcement. The recommendations in the Policy are far-reaching. We look forward to working with the OHRC to address issues related to the recommendations and providing guidance to our organizations.” See: http://www.ohrc.on.ca/en/news_centre/ohrc%E2%80%99s-new-policy-will-support-law-enforcement-eliminate-racial-profiling.

Note: PRP will continue to work with the Ontario Human Rights Commission on additional recommendations not included in this document.

#	Detailed Recommendation	PRP's Work Plan
I. ACKNOWLEDGEMENT		
1	Publicly acknowledge the reality of racial discrimination in PRP service-delivery, the impact on trust, and the specific impact on Black, racialized and Indigenous communities. PRP should apologize for racially-discriminatory service delivery and commit to ending systemic racism within PRP.	<ul style="list-style-type: none"> • On numerous occasions and forums, the Chief acknowledged and apologized for systemic racism in policing and racial discrimination in PRP's service delivery. • PRP is committed to eliminating systemic racism in Policing. • PRP voluntarily agreed to work with the Ontario Human Rights Commission (OHRC) to implement in-scope Remedies. • PRP formed an Anti-Racism Advisory Committee (ARAC) comprised of members from the Peel Region with lived experience to advise on the recommendations. Prior to publication, the Chief's apology will be shared with the ARAC for input. • A written apology will be published on the PRP website. • Acknowledge other healthcare and community service providers play a crucial role in promoting public safety.
1a	Engage with Peel's diverse communities on the form and content for the acknowledgment in 1.	
2	<p>The acknowledgement or apology should reflect the following:</p> <ul style="list-style-type: none"> • The unique experiences of each racialized community and the intersectional identities that exist within those communities. • Data from use of force reports. • Individual incidents involving the police may reflect systemic issues that need to be addressed by the service. • Police are not always the best institution to respond to calls that do not involve an emergency or criminal conduct. • Racialized communities experience Inter-generational harm tied to origins of policing. 	

II. ENGAGEMENT		
3	<p>Create an Anti-Racism Advisory Committee composed of anti-racism experts and people with lived experiences who reflect diverse viewpoints on the role of police (Carby Inquest). This advisory group would consult with Peel’s diverse Black, Indigenous and racialized communities and provide ongoing advice on the content of these recommendations and how best to meaningfully implement these recommendations.</p>	<p>PRP has formed an Anti-Racism Advisory Committee (ARAC) with representation from the Indigenous, Black, and racialized communities with lived experience.</p> <ul style="list-style-type: none"> • ARAC also includes representation from the Police Service Board (PPSB). • Peel Regional Police (PRP) engaged the community on the essence of the recommendations through a survey and a series of Q&A sessions. • ARAC Mandate: <ul style="list-style-type: none"> ○ The Anti-Racism Advisory Committee will provide meaningful and thoughtful advice on the Human Rights Project undertaken by Peel Regional Police (PRP) service on the content of the recommendations and how best to implement the finalized recommendations agreed with OHRC within the boundaries of the Memorandum of Understanding (MOU).
4	<p>Engage Peel’s diverse communities on a broad array of issues related to ending systemic racism in policing, including community calls for alternate approaches to police services, and identifying opportunities to enhance efficiency, and sustainability in service delivery and the possible redirection of non-core policing functions</p>	<p>Peel Regional Police (PRP) Human Rights Project team will engage Peel’s diverse community in conversations on reallocating community resources where Police are ill-equipped to deal with specific situations (e.g., mental health crises).</p> <p>Additional Information: There are restrictions in the Police Service Act that prevents the Police from utilizing third-party response agencies for calls that are initially directed to the Police.</p>

		<ul style="list-style-type: none"> • A response to an emergency call is comprised of a tiered service involving Police, fire, and ambulance. Police officers are first responders and, while they are not experts in mental health matters, will be the first to arrive at a crisis. The Police are authorized by law to use an array of tools and tactics to de-escalate situations to prevent unnecessary injury to the subject and/or members of the public. • The Mental Health Act, Section 17 requires Police to be the first responders in a crisis. An amendment to the Act is necessary for Mental Health Crisis workers to be first responders in a Crisis Situation. PRP does not have any jurisdiction over the Mental Health Act. However, as part of the Community Safety and Well-being framework, PRP is working with our community partners in the Canadian Mental Health Association (CMHA) to derive a new working model where a mental Health Crisis worker accompanies the Police to a crisis. Please note there are challenges, such as Police operating 24/7, 365 days a year, while the majority of our partners do not, and funding shortfall for our partners equate to a lack of resources to assume leadership roles in responding to crisis situations.
5	In consultation with Black communities, the PRP and PPSB should consider whether this action plan should form part of the strategic plan for the provision of policing, required by	Response to this recommendation is dependent on the release of the Comprehensive Ontario Police Services Act (COPSA).

	s.39(1) of the Comprehensive Ontario Police Services Act when it comes into force.	
6	PRP and the PPSB should work with community groups to identify the desired outcomes from the engagement process and track the extent to which those outcomes have been fulfilled by conducting pre-and post-engagement surveys or adopting other relevant measures.	Response to this recommendation is dependent on the release of the Comprehensive Ontario Police Services Act (COPSA).
7	PPSB should amend its existing policy to incorporate a community renewal fund dedicated to advancing community safety and well-being initiatives for Indigenous, Black, and racialized communities.	Agree
8	PRP, in collaboration with ARAC and OHRC, should develop a community experiences portal where community members can share their views, thoughts and experiences with PRP.	Peel Police Service Board (PPSB) to explore ideas
9 a	PRP should collect and release survey data on community perspectives on policing.	Peel Regional Police (PRP) reports data annually on an aggregate basis.
9 b	PRP should collect and release data on the number of officers under disciplinary review.	
10	PRP should commit to working with community service providers that may assist members of the public that have suffered vicarious trauma stemming from interactions with police which have been reviewed by a complaints or oversight body, or internal review.	Peel Regional Police is committed to working with community service providers to meet this recommendation.

III. POLICY GUIDANCE		
	Policy on Eliminating Racial Discrimination	
11	PRP should conduct a policy review and update their policies as per an established timetable, including the PRP's Directive on Racial Profiling / Bias-Based Policing, I-B-158 (F), and procedures, training, and accountability mechanisms to ensure they reflect the principles and best practices as laid out in the OHRC's Policy on eliminating racial profiling in law enforcement.	Peel Regional Police (PRP) has completed this recommendation by updating Directive I-B-158(F) on Racial Profiling / Bias-Based Policing in accordance with OHRC's Policy on eliminating racial profiling in law enforcement.
12	These updates should include:	
12a	Referencing the OHRC's Policy on eliminating racial profiling in law enforcement in Section A;	Peel Regional Police (PRP) has completed this recommendation by updating Directives I-B-158(F) to reference OHRC's Policy on eliminating racial profiling in law enforcement.
12b	Replacing the Directive's definition in Section C of racial profiling with the OHRC's definition of racial profiling as "any act or omission related to actual or claimed reasons of safety, security or public protection by an organization or individual in a position of authority, that results in greater scrutiny, lesser scrutiny or other negative treatment based on race, colour, ethnic origin, ancestry, religion, place of origin or related stereotypes";	Peel Regional Police (PRP) has replaced Directive I-B-158(F) with the definition in Section C of racial profiling: "any act or omission related to actual or claimed reasons of safety, security or public protection by an organization or individual in a position of authority, that results in greater scrutiny, lesser scrutiny or other negative treatment based on race, colour, ethnic origin, ancestry, religion, place of origin or related stereotypes".
12c	Qualifying the guidance provided in Section D of the Directive by stating, "In human rights and criminal law, it is a recognized principle that racial profiling can occur even where race is one factor among other legitimate factors	Peel Regional Police (PRP) has updated Directive I-B-158(F), Section D to align with OHRC's "In human rights and criminal law, it is a recognized principle that racial profiling can occur even where race is one factor among other legitimate factors used to single someone

	used to single someone out. Therefore, extraordinary caution must be taken when using criminal profiles that include race or related grounds, even if these are coupled with other objective factors;"	out. Therefore, extraordinary caution must be taken when using criminal profiles that include race or related grounds, even if these are coupled with other objective factors;"
12d	Incorporating the concept of under-policing as a component of racial profiling, by adding a statement to Section F of the Directive that, "No member of the P.R.P. shall, in the course of an investigation, devote a lesser amount of time to an investigation because of race, colour, apparent ethnicity, ancestry, religion or place of origin;"	Peel Regional Police (PRP) has updated Directive I-B-158(F), Section F with OHRC's "No member of the P.R.P. shall, in the course of an investigation, devote a lesser amount of time to an investigation because of race, colour, apparent ethnicity, ancestry, religion or place of origin"
12e	Identification of the potential role of racial profiling or bias in incident response and use of force decisions;	<p>PRP's approach to this recommendation encompass the following:</p> <ol style="list-style-type: none"> 1. An Integrated Training model 2. Evaluation and measurements of our training 3. Development of processes / procedures 4. Robust supervision of all Use of Force occurrences with a consideration to racial profiling. <p>Reference the Five Pillars of the Human Rights Training:</p> <ol style="list-style-type: none"> 1. History of Racism 2. Bias and Racial Profiling 3. Procedural Justice 4. Trauma Informed Approach 5. Legislation, Policy and Procedure.
12f	The requirement that supervisors must proactively monitor and address allegations of Anti-Black racism, Anti-Indigenous racism,	Peel Regional Police (PRP) confirms the Directive: I-A-204(F) Code of Ethics, Conduct, and Discipline –

	racial profiling or other forms of biased-based policing;	<p>Sworn Members aligns with Ontario Human Rights Commission (OHRC)'s recommendation:</p> <p>To create and continually reinforce an environment that encourages acceptable behaviour, consistent with this Code of Conduct, Supervisors shall:</p> <p>(a) Ensure sworn members know what is expected of them and foster a co-operative team approach to their duties;</p> <p>(b) Provide consistent direction to subordinates, maximizing the use of coaching, counselling and training; and,</p> <p>(c) Review the P.R.P. Policies and Directives in order to effectively interpret them for subordinates.</p>
12g	The requirement that allegations of biased policing, including racial profiling, are entered and tracked in any disciplinary tracking system (e.g. I.A. Pro);	<p>Peel Regional Police (PRP) will approach this recommendation in stages by defining processes to identify allegations of biased policing and ensure these are tracked in the Internal Affairs (I.A.) Pro system.</p> <p>In collaboration with data collection and training experts, PRP will identify key performance indicators/benchmarks that would provide early warning for PRP to take appropriate measures to prevent/address these allegations.</p>
12h	Clear identification of intentional, unconscious, and systemic sources of racial profiling, including artificial intelligence sources of racial profiling;	Agree
12i	The requirement that officers use de-escalation techniques and tactics, whenever possible, to minimize the need to use force and increase the likelihood of voluntary compliance with legitimate and lawful orders;	PRP confirms this recommendation as 'Complete' since the Directives already includes de-escalation techniques and tactics to minimize the use of force as referenced in the Directives below.

		<p>PRP will re-enforce this recommendation through heightened training.</p> <p>Directive I-B-102(F) – Incident Response, addresses these recommendations in sections E.3., F.3. and J.16.:</p> <p>Section E.3.: “Crisis Intervention and De-escalation (C.I.D.) techniques shall be used by all members in an attempt to de-escalate crisis situations, including incidents involving intervention in a mental health crisis. For more information on mental health crisis intervention, members shall refer to P.R.P. Directive I-A-603(F), or any other directives dealing with “Mental Health Policy”.</p> <p>Section F.3.: “The application of force is to control the subject, or in defence against an assault. Force shall not be applied for malicious or punitive reasons but be applied at a level sufficient to control the subject; however, it shall not be excessive. Upon subject compliance, the level of force shall be de-escalated.”</p> <p>Section J.16.: “Prior to using a C.E.W., Officers shall consider the following:</p> <ul style="list-style-type: none"> (a) Whether efforts to de-escalate the situation have been effective; (b) Whether verbal commands are not practical or are not being followed; (c) The risk of secondary injury (e.g., as a result of a fall); (d) The C.E.W.’s capabilities concerning the context and environment; and, (e) Whether it is reasonably necessary to use an intermediate weapon.”
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<p>12j</p>	<p>The requirement that officers take reasonable steps to intervene in a manner that is proportional to the risk of harm if the act continues, with the goal of de-escalating the situation, and report the incident;</p>	<p>*Directive I-B-102(F) – Incident Response</p> <p>Peel Regional Police (PRP) has updated Directive I-B-158(F)* – Racial Profiling and Directive I-A-204(F) ‘Duty to Intervene’ to accommodate this recommendation.</p> <p>Directive I-B-158(F)* – Racial Profiling has been updated: Any member or former member who has reason to believe that another member of the police service has engaged in conduct that constitutes misconduct including, but not limited to, assault or physical abuse (i.e. excessive use of force) involving any person, shall:</p> <p>(a) Where feasible, intervene and take reasonable steps to prevent the behaviour from continuing;</p> <p>(b) Record details of the incident and substance of the complaint, including dates, times, locations, other persons present and other relevant information, including the presence of video and/or other evidence; and</p> <p>(c) Report the incident forthwith, to their immediate supervisor, another supervisor, or in cases of workplace violence, harassment or discrimination, also consider reporting the incident to the Human Rights Coordinator.</p> <p>Current Directives: Directive I-B-158(F)* – Racial Profiling, addresses these recommendations in sections F.3. and F.4.:</p>
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		<p>Section F.3.: “Any member who observes an activity or receives a complaint relating to racial profiling or bias based policing shall notify a Supervisor.” Section F.4.: “Any Sergeant, Staff Sergeant, Detective, Detective Sergeant or other Supervisor or Senior Manager who observes an activity or receives a complaint relating to racial profiling or bias based policing shall document the matter and take corrective action.” *Directive I-B-158(F) – Racial Profiling *Directive I-B-136(F) – Diversity Relations and Anti-Discrimination policy addresses these recommendations in section F.3.: “Any Supervisor of this Service who observes or receives a complaint of discrimination and/or harassment shall take appropriate corrective action as outlined in P.R.P. Directive I-A-205(F), or any other directives dealing with “Workplace Discrimination and Harassment”. *Directive I-B-136(F) –Diversity Relations and Anti-Discrimination</p>
12k	<p>A prohibition on street checks and carding, which can be defined as officers requesting identifying information from members of the public with insufficient grounds for doing so. Note that this definition is broader than Ontario Regulation 58/16, Collection of Identifying Information in Certain Circumstances - Prohibition and Duties;</p>	<p>Although Peel Regional Police (PRP) is unable to amend the Policy for carding and Street checks since these are governed under provincial legislation, PRP has processes and procedures to prevent our officers from performing carding and street checks. In addition, PRP will ensure this recommendation is instilled through improved techniques, heightened training, and communication. Directive I-B-706(F) – Collection of Identifying Information Section B.1. addresses this recommendation: Section B.1.: It is the Policy of this Service that:</p>

		<p>i.(a) Officers shall gather and process criminal intelligence and participate in the collection of identifying information in accordance with this directive;</p> <p>(b) Officers shall collect identifying information in an unbiased manner. Officers are prohibited and shall not select a person(s) for information collection based solely on criteria that are prohibited under the Ontario Human Rights Code (i.e. race, ancestry, place of origin, colour, religion, ethnic origin, sexual orientation, age, sex, citizenship, marital or family status, physical or mental disability, or social condition);</p> <p>(c) any attempt by an Officer to collect identifying information from a person shall be done in accordance with Ontario Regulation 58/16 of the Police Services Act; and,</p> <p>(d) the random and arbitrary collection of identifying information is strictly prohibited.</p>
12l	<p>A prohibition on performance management measures – pertaining to periodic counts of tickets, charges, arrests, stop and question activities, etc. – that may incentivize racial profiling and racial discrimination;</p>	<p>Peel Regional Police (PRP) does not have a quota for enforcement and will continue to uphold this practice.</p> <p>Officers are not evaluated on tickets/arrests. When an officer seeks advancement, the officer has a set of core competencies to meet the rank.</p> <p>Directive I-B-610(F) Traffic Management – Bureau lead shall determine and deploy traffic enforcement personnel in accordance with sound traffic management and traffic law enforcement, not based on quotas.</p>
12m	<p>With respect to concerns regarding traffic stops, we recommend Peel Regional Police should:</p> <p>(a) Collect and publicly disclose disaggregated</p>	<p>Agree</p>

	<p>data on all traffic stops- that includes race, Indigenous ancestry, age, and gender of the driver and witnesses (if any present with subject)</p> <p>b) Any policy, directive, or training, which sanction vehicle stops should not undermine human rights considerations. Accordingly, protected grounds under the Human Rights Code, including race, should not be a factor when an officer decides to stop a vehicle.</p>	
12n	<p>The requirement that officers approach all interactions with Black, Indigenous and other racialized persons, including youth and adults, in a manner that takes into account histories of being over-policed, and use alternatives to charges and arrests, where appropriate. This includes and builds upon the requirement from the Youth Criminal Justice Act that police officers consider the use of extrajudicial measures, such as informal warnings, police cautions, or referrals to community resources, before deciding to charge a young person;</p>	Agree
12o	<p>The Youth Crimes Investigation Directive should be amended as follows:</p>	
12o i	<p>The Youth Crimes Investigation Directive should be amended to exclude children under 12, from the sections of the directive that apply to “young persons” or young offenders aged 12 and older who can be charged under the YCJA.</p>	Directives I-B-743(F) and I-B-515(F) have been updated.
12o ii	<p>Section H of the Youth Crimes Investigation Directive should be amended to recognize the</p>	An update to the Directive I-B-743(F) is not required since it provides clear direction when officers engage

	<p>particular vulnerability of youth in general and children under 12. Children under 12 should not be detained in police holding facilities. For children under 12, officers must explore all other options and contact the young person's parents before they are detained.</p>	<p>with children under 12 years of age and section (G) & (H) gives direction on arrest, charge, release and detention of young persons 12-17 years of age.</p> <p>Children Under 12 are not charged and not placed in a holding facility. Children aged 12 to 17 parents/guardians are contacted.</p>
12o iii	<p>Section K of the Youth Crimes Investigation Directive should be amended as follows: Children under 12 shall not be subject to strip searches.</p>	<p>A child under 12 is never charged or strip-searched. If the child is under 12, the Police's direction is not to lay charges but to protect the child and support the Children's Aid Society (CAS).</p> <p>Additional Details: Officers are not permitted to conduct a strip search without the permission of a Staff Sergeant and reasonable grounds are required to justify a strip search.</p> <p>Under no circumstances does this apply to children under 12</p>
12o iv	<p>Section E.3 of the Youth Crimes Investigation Directive should be amended as follows: Pre-charge diversion shall be considered for young persons with prior involvement with the law, which can be characterized as minor in nature.</p>	<p>Associated Youth Services of Peel (AYSP) administers Youth Pre-Charge Diversion. Springboard Services is the provincially appointed organization responsible for the Youth Cannabis Diversion program.</p> <p>Directives I-B-515(F) and I-B-743(F) have been updated</p>
12p	<p>The Police School Response Program should be terminated effective immediately allowing</p>	<p>In November 2020, Police School Response Program (referred to as School Resource Officer (SRO) was</p>

	<p>the school boards to establish appropriate protocols.</p>	<p>terminated. The new school protocol reflects three thresholds for a response from the Police.</p> <ol style="list-style-type: none"> 1. Referral to other services if not criminal 2. Respond if there is an imminent threat to public safety 3. Respond if there is an allegation of criminality or breach
<p>12q</p>	<p>How racialized persons who reasonably believe that they are being racially profiled can be expected to find the experience upsetting and might well react in a disrespectful manner. A trauma informed approach means a person's use of disrespectful and negative language toward the officer requires reasonable tolerance and tact and cannot form the basis of further differential treatment;</p>	<p>Peel Regional Police (PRP) implemented a Human Rights centred training strategy based on OHRC recommendations. Working closely with Subject Matter Experts (SME), including Professor Owusu-Bempah, Child Psychologists, and the Canadian Mental Health Association Peel Dufferin. The following course has been chartered with oversight from the experts:</p> <p>Implicit Bias awareness - is being weaved through all aspects of our training from a self-awareness perspective. This will increase an officer's knowledge, skills, and abilities in the following five pillars.</p> <ol style="list-style-type: none"> 1. History of Racism in Canada - Negative police interactions with various community groups: The focus will be to educate on our own past and policing within the context of it, how this negative portrayal results in bias, both conscious and unconscious, being formed by officers towards Black, Indigenous and racialized populations. 2. Unconscious Bias Awareness – Discussing and defining racism, discrimination, and biases, both conscious and unconscious. <p>Where our biases come from and how being a police officer can lead to further biases. Officers learn the</p>

		<p>impacts of these on our community and relationships. Officers will also learn strategies for recognizing and acknowledging their biases and ways to counter them. These include dealing with fears and anxieties from biases that may influence their decision-making.</p> <p>3. Procedural Justice – How taking a human rights approach, being respectful, and showing dignity in all interactions help shape the community's opinion of the Police. Officers will learn the need and benefits of being fair and impartial.</p> <p>These include being fair in processes (including using discretion when appropriate), being transparent in actions, providing opportunities for voice, and being impartial in decision-making.</p> <p>Officers will adopt the view that community members are partners in public safety.</p> <p>4. Trauma-Informed Approach – Includes defining trauma, the effects of trauma, and types of trauma, including intergenerational and historical trauma. Officers will learn to recognize that aggression may result from past trauma.</p> <p>This is educating officers to recognize situations where they are met with aggression and negative comments, which may result from the person having experienced past traumatic events, including negative police interactions, whether their own experience or perceived.</p>
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		<p>Officers will be educated on taking a trauma-informed approach so that they apply different lens to interpreting their responses while recognizing their own biases.</p> <p>5. Authorities – Officers will receive a review and comprehension of various legislation, including the Charter, Collection of Identifying Information in Certain Circumstances (CIICC, street checks), Ontario Human Rights Code, Ontario Police Services Act, and both Federal, Provincial statutes and Anti-Racism Act Data Standards.</p> <p>The synergy of this training will give officers a holistic view of Biases in policing and the awareness, recognition, and strategies to change their behavioural responses to interactions with Black, Indigenous and Racialized populations.</p>
12r	<p>How racial profiling and racial discrimination violate the Code, Charter, Police Services Act and the Comprehensive Ontario Police Services Act, 2019 with references to relevant case law; The principles that apply to claims of racial discrimination, such as how intent is not required and how it may be proven by circumstantial evidence and inference;</p>	<p>Addressed through training.</p>
12s	<p>PRP should develop a mechanism for officers to report discrimination which protects the confidentiality of the reporting officer, subject to any legal restrictions</p>	<p>“Whistle Blower” mechanism is in place in the Code of Ethics, Conduct and Discipline Directive I-A-204(F)</p> <p>Section H: Ethical Reporting Hotline</p>

		The process utilized for anonymity or fear of reprisal established for reporting breaches in service or workplace harassment.
12t	Regularly assessing deployment patterns for concerns about racial profiling, consistent with the OHRC's Policy on Eliminating Racial Profiling in Law Enforcement; and	Analysis of race-based data and input from the human rights subject matter experts with input from the Anti-Racism Advisory Committee will guide and inform the evaluation and assessment of deployment patterns.
12u	<p>The PRP should develop a policy on the use of artificial intelligence that:</p> <ul style="list-style-type: none"> - Acknowledges the demonstrated potential for AI technologies to infringe on human rights and exacerbate systemic racism and discrimination if they are implemented without sufficient safeguards for individuals' rights - Ensures that artificial intelligence, including biometric identification technologies, are not being used in discriminatory ways; this includes, but is not limited to, racial discrimination. - In the acquisition and development of procedures for AI technologies, commits to meaningful engagement with the public and experts in Charter compliance, and any other experts as required. - Permits the PRP to use AI technologies only after passing community review to the greatest extent possible, and subject to privilege and confidentiality, and privacy and human rights assessments. As part of these assessments, an expert in racial bias in data science shall be consulted, as well as the IPC and the OHRC. The assessments should not be completed by 	PRP is committed to deriving appropriate policies to align with this recommendation when the application of AI is being considered.

<p>third-parties that are paid by or otherwise have a relationship with the vendor of the technology that would pose a conflict of interest.</p> <p>'- AI technologies must also satisfy the principles from the federal-provincial-territorial privacy guidance on facial recognition for police agencies, and the Global Privacy Assembly's "Principles and Expectations for the Appropriate Use of Personal Information in Facial Recognition Technology", specifically its positions on protections for human rights</p> <ul style="list-style-type: none"> - To the greatest extent possible, make public all information on PRP's use of AI technologies, including but not limited to: <ul style="list-style-type: none"> a) details on their purpose, how and when they are used; b) what data are collected, how the data are used, and when the data will be disposed; and c) assessments and evaluations of the technologies and their use. - Establishes criteria for when human oversight and interventions are required and requires sufficient resources to be allocated to perform this oversight role. - Provides a mechanism for hearing and addressing public complaints regarding the consequences of using AI, which recognizes that rights holders are not well-positioned, and are therefore at a disadvantage to demonstrate their claim as they do not have access to data held by PRP. 	
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12v	Ensure that officers are aware of the potential racial bias which may flow from the use of artificial intelligence tools, and the impact of artificial intelligence on officer deployment decisions.	Officers have and continue to receive mandatory training on their biases not just specific to race. When and if AI is used, PRP will create a training module and policy that addresses AI tools and potential for racial bias on officer deployment decisions. Some of the specific biased focused courses include: 1. The Collection of Identifying Information in Certain Circumstances 2. Trauma Informed 3. Implicit Biases 4. Advanced Patrol Training 5. Racial Profiling
13	PRP should revise the Directive on Diversity Relations and Anti-Discrimination, I-B-136 (F),	Completed
13a	Recognize and condemn the presence of systemic racism in policing in Peel;	Addressed through training.
13b	Acknowledge the nature and historical context of racism, including its particular origins and impact on Black, Indigenous and other racialized communities;	Addressed through training.
13c	Identify the principles that apply to claims of racial discrimination, such as how intent is not required and how it may be proven by circumstantial evidence and inference.	Addressed through training.
Policy on Laying a Charge		
14	PRP should ensure its procedures on laying a charge include:	
14a	The requirement that all officers approach all interactions with Black, Indigenous and other racialized persons, including youth and adults, in a manner that takes into account histories of being over-policed, and use alternatives to charges and arrests, where appropriate. This	Directive: I-B-743(F)* – Youth Crime Investigations has been amended.

	includes and builds upon the requirement from the Youth Criminal Justice Act that police officers consider the use of extrajudicial measures, such as informal warnings, police cautions, or referrals to community resources, before deciding to charge a young person;	
15	<p>The PRP should conduct audits of charges laid for the following provincial offences, and administration of justice charges at the organizational level, with the intent to move to the unit level.</p> <p>These audits should monitor whether Indigenous or Black persons are over-represented in:</p> <ul style="list-style-type: none"> i. Trespassing ii. Out-of-sight driving offenses (including driving without a valid licence, driving without valid insurance, driving while suspended, etc.) iii. Failure to comply with a condition, undertaking or recognizance <p>The data collected and the result from the audits should be released publicly, with the goal of doing this annually.</p>	Peel Regional Police (RPP) will take a phased approach to this recommendation.
	Policy on Use of Force: PRP's Directive on Incident Response	
16	Amend PRP's Directive on Incident Response, including Section D and Section E (3), Section H(8), Section I, and Section K to require communication and de-escalation techniques, prior to all use of force options, whenever possible.	<p>The use of force (UoF) is federally and provincially legislated. Since 2020, as a result of the findings of the Carby inquest, De-escalation has been in place since 2020.</p> <p>However, the new use of force guidelines from the Province, Peel Regional Police (PRP), has updated the</p>

		<p>policy on de-escalation. In addition, PRP will seek guidance from the anti-racism, crisis intervention, and de-escalation experts to develop training that will re-iterate and emphasize de-escalation and communication before using use of force. However, depending on the circumstances of the interaction, officers may not have time to communicate and use de-escalation techniques prior to utilizing use-of-force options.</p> <p>Directive I-B-102(F)* – Incident Response addresses these recommendations in sections E.3., F.3. and J.16.</p> <p>Section E.3. “Crisis Intervention and De-escalation (CID) techniques shall be used by all members in an attempt to de-escalate crisis situations, including incidents involving intervention in a mental health crisis. For more information on mental health crisis intervention, members shall refer to PRP Directive I-A-603(F), or any other directives dealing with “Mental Health Policy”.</p> <p>Section F.3. “The application of force is to control the subject or defend against an assault. Force shall not be applied for malicious or punitive reasons but be applied at a level sufficient to control the subject; however, it shall not be excessive. Upon subject compliance, the level of force shall be de-escalated.”</p> <p>Section J.16. “Prior to using a C.E.W., Officers shall consider the following: (a) Whether efforts to de-escalate the situation have been effective;</p>
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		<p>(b) Whether verbal commands are not practical or are not being followed;</p> <p>(c) The risk of secondary injury (e.g., as a result of a fall);</p> <p>(d) The CEW's capabilities in relation to the context and environment; and,</p> <p>(e) Whether it is reasonably necessary to use an intermediate weapon.”</p>
17	<p>PRP's incident response directive should clarify the concept of disengagement. The procedure should state that disengagement includes the goals of taking the time to de-escalate and re-position where it is appropriate and safe to do so, in order to avoid using force.</p>	<p>Peel Regional Police (PRP) already includes disengagement as part of their training in incident response and as it is included in the directive.</p>
18	<p>PRP's Directive on Incident Response should be amended to limit the use of force options that can be applied to children under 12. De-escalation should be used extensively with children. Thereafter age appropriate soft hand, crisis prevention techniques should be explored or used before any weapon or restraint is applied. Officers should only utilize use of force options as a last resort on children under 12 and only if the child is in possession of a weapon which poses an imminent threat of serious physical injury or death to themselves or another person. In addition, the use of force option used by an officer on a child under 12 shall not offend the following principles:</p>	<p>Updated as JKB already in place</p>

	<ul style="list-style-type: none"> • Any use of force on a child cannot be degrading, inhumane, or result in harm or the prospect of harm. • The seriousness of the child’s misbehaviour is not relevant to deciding whether the force used was reasonable. The force used must be minor, no matter what the child did. 	
19	PRP should review and if necessary, conduct an investigation into the circumstances that result in the discharge of a CEW.	Revisions to Peel Regional Police (PRP) Directives are in progress.
20	The Incident Response directive should reflect that when dealing with vulnerable populations, including elderly, children under 12, mentally disabled, exhibiting behavioural issues should be treated as “in need of protection”.	Revisions to Peel Regional Police (PRP) Directives are in progress.
20a	Where possible, use de-escalation techniques which are tailored and appropriate when engaged with vulnerable populations.	Revisions to Peel Regional Police (PRP) Directives are in progress.
20b	Section J (15) of the Directive on Incident Response should be amended to discourage the use of CEWs on all children, not just “children under 12”.	Already updated
20c	PRP shall ensure that officers produce a report to their supervising officer every time force is applied to a child age 12 and under. This report must be reviewed by the supervising officer and qualifying use of force instructor to confirm that appropriate de-escalation steps were taken and that the use of force was made as a last resort.	Already in place

20d	If an officer fails to take appropriate steps to de-escalate a child ensure accountability measures are in place to address the incident.	Peel Regional Police (PRP) confirms this recommendation as complete. The objectives of the recommendation are addressed in 9(b), where a supervisor will review activities. If warranted, progressive discipline will be initiated. PRP dispatches a Sergeant for any incident involving a child. The Sergeant will witness, guide and supervise the appropriate application of de-escalation techniques. The Sergeant is responsible for ensuring officers are compliant with PRP policy. This supervision policy provides the necessary oversight to ensure the use of de-escalation techniques with children. If inappropriate force is used on a child without de-escalation in the presence of the supervisor, all attendees will be held accountable.
20e	The Chief shall make a report to the PRPSB regarding disciplinary measures imposed against an officer who has used unjustifiable force against a child 12 and under, subject to the confidentiality provisions of the PSA	Peel Regional Police (PRP) confirms this recommendation as 'Complete' since processes and procedures are currently in place for reporting to the Peel Police Board (PSB) discipline against an officer who has used unjustifiable force against a child 12 and under, subject to the confidentiality provisions of the Comprehensive Ontario Police Service Act. Accordingly, an update to the Directive is not required.
21	PRP agrees adopt a 'zero harm / zero Death' approach to use to force incidents, including zero tolerance for excessive force. In accordance with a recommendation from the Honourable Frank Iacobucci's report on Police Encounters with People in Crisis[2], Toronto Police Services and Toronto Mayor John Tory agreed to adopt a 'zero death / zero harm' commitment to preserving the lives of persons in crisis. PRP should adopt this objective for	Peel Regional Police (PRP) has adopted a zero harm, zero death approach to Use of Force training and has implemented the 5 pillars of Human Rights training as mandatory for all officers. PRP has also centred de-escalation techniques as a fundamental principle to be used by officers in order to prevent a Use of Force response. PRP has adopted a 'Zero harm / Zero death approach to use of force by:

	<p>all civilians, however particular emphasis should be placed on interactions with racialized persons and person in crisis as these groups are overrepresented in encounters with the police which result in the use of deadly force.[3] As part of this strategy TPS has explored the use of less lethal use of force options.[4]</p> <p>In order to achieve this objective, PRP will continue to advocate for the Mobile Crisis Rapid Response Teams (MCRRT) to be adequately resourced and available to all divisions on a twenty-four (24) hour basis seven days a week.</p>	<ul style="list-style-type: none"> • All front line officers issued CEWs; • Initiating the Augmented Response Officer (ARO) Shield program. With this, a number of officers at each division have access to a shield, helmet and hard body armour. • Implementing training for mental health de-escalation • Implemented COAST/MCRRT &IRTP/CIICC training; • Implementing training/strategies as a result of Carby Inquest findings including: <ul style="list-style-type: none"> • Mental Health Awareness • CIICC • Fair and Impartial • Unconscious Bias • Crisis intervention and De-escalation
22	<p>Incident Response Directive should be amended to incorporate the following principles :</p>	<p>The Ontario Use of Force Model is legislated by the province and provides a continuum of use-of-force options based upon officer perception and subject behaviour.</p> <p>in consultation with an independent Anti- Racism, Crisis Intervention & De-escalation Expert, Peel Regional Police (PRP) has implemented appropriate training to align with this recommendation.</p>
22a	<p>Require officers to exhaust all other reasonable alternatives before resorting to using deadly force.</p>	<p>The Ontario Use of Force Model is legislated by the province and provides a continuum of use-of-force options based upon officer perception and subject behaviour.</p>
22b	<p>prohibit officers from using lethal force or shooting at individuals unless they pose an imminent threat of death or serious bodily harm,</p>	<p>in consultation with an independent Anti- Racism, Crisis Intervention & De-escalation Expert, Peel</p>

22c	Prohibit officers from using lethal force unless the individual is using deadly force, or causing serious bodily harm against or another individual	Regional Police (PRP) has implemented appropriate training to align with this recommendation.
22d	Require officers to intervene to stop another officer from using excessive force and to report this to their supervisor afterwards.	<p>Peel Regional Police (PRP) has updated the code of conduct directive with 'duty to intervene.' Directive: 1-A-204(F) has been updated to:</p> <p>Members - Duty to Report/Intervene:</p> <p>Any member or former member who has reason to believe that another member of the police service has engaged in conduct that constitutes misconduct including, but not limited to, assault or physical abuse (i.e. excessive use of force) involving any person, shall:</p> <ul style="list-style-type: none"> (a) Where feasible, intervene and take reasonable steps to prevent the behaviour from continuing; (b) Record details of the incident and substance of the complaint, including dates, times, locations, other persons present or relevant information, including the presence of video and/or other evidence; and (c) Report the incident forthwith, to their immediate supervisor, another supervisor, or in cases of workplace violence, harassment or discrimination, also consider reporting the incident to the Director, Human Resources. <p>Supervisors - Duty to Report/Intervene</p>

		<p>Supervisors are accountable if they knew, or ought to have known, about members' inappropriate behaviour, including misconduct, and did not intervene when necessary. Any supervisor to whom misconduct is reported shall:</p> <ul style="list-style-type: none"> (a) Intervene and take steps when required to stop the alleged misconduct; (b) Take steps to resolve the matter in accordance with the principles of Corrective Discipline as detailed in sections H, I and J of this Directive; (c) Address the matter in accordance with P.R.P. Directive I-A-205(F) – Workplace Discrimination and Harassment when applicable.
22e	Alternative communication techniques when engaging with individuals experiencing a mental crisis, who may not be able to understand or comply with the Police Challenge discussed in Section L.	Since 2021, Peel Regional Police (PRP) has boosted de-escalation techniques.
22f	Amend Appendix A, consisting of the graphical depiction of Preferred CEW Target Zones, to avoid individuals' genital areas.	PRP confirms this as 'complete'. Directive I-B-102(F) (15) (c) states that where possible, CEW use should be avoided on sensitive areas of the body.
22g	Review BWC footage following all reported use of force incidents to determine if misconduct or discrimination were a factor in the officer's decision to use force.	Outlined in Body Worn Camera directive
22h	Officers should be required to immediately provide aid when a subject suffers injury as a result of an application of force.	The current PRP Incident Response directive I-B-102(F), section T – Medical Aid, states when a subject suffers an injury as a result of an application of force,

		an officer shall ensure appropriate medical aid is provided and document the actions accordingly. An officer not following protocol could be investigated for Neglect of Duty.
22i	In accordance with case law regarding use of force, the incident response procedure should note that use of force by members should be proportional.	Peel Regional Police (PRP) incident Response directive I-B-102(F), section D – General already accounts for this recommendation: The law provides members authorities to use force during the course of their duties, however the use of such force is strictly controlled and limited. Forced used shall be reasonable and necessary. If force is deemed excessive, the member shall be held responsible as per legislation.
	Police School Protocol and Officer Engagement with students	
23	The Peel Regional Police (“PRP”) should conduct a thorough review of any existing or planned polices which address officer engagement with minor students, with the aim of limiting police involvement in schools (K-12). As part of this review, the expert should consult with Black, racialized and Indigenous communities in Peel, particularly parents and children in Peel schools; and the Anti-Racism Advisory Committee.	Already in place. If PRP return to schools we will consult with Black, Racialized and Indigenous communities and experts.
24	The PRP should immediately make any necessary modifications to the protocol after the review has been completed to ensure that it is in compliance with the Ontario Human Rights Code, the Youth Criminal Justice Act, and the Canadian Charter of Rights and Freedoms.	Reference response to #23

25	<p>The PRP should engage the signatories to the Local Police School Protocol, including the Peel District School Board, and take steps to ensure that any future protocol or directive regarding police interaction with youth in schools incorporates perspectives from the Human rights projects use of force and data collection expert's</p>	Reference response to #23
26	<p>1. PRP should take immediate steps to ensure that any future police school protocol that addresses, "Occurrences Involving Students Under Age 12" includes the following:</p> <p>a) All calls received from the school system to address student behaviour should be directed to appropriate agencies in all possible circumstances;</p> <p>b) If there are circumstances where police respond to behavioural issues, Mobile Crisis Rapid Response Team should be dispatched.</p> <p>c. If a school requests the assistance of PRP to address the behaviour of a student, the following information must be collected and relayed to the Mobile Crisis Rapid Response Team that will attend the scene:</p> <p>i. Whether or not the child has any known mental health issues.</p> <p>ii. Whether the school attempted to contact the child's parent or guardian.</p> <p>d) Whether the child has a safety plan in place, and the de-escalation strategies recommended in the safety plan.</p>	Agree

	e) PRP shall make best efforts to engage partners in the mental health sector to assist with the implementation of these recommendations.	
27	Future policies or directives regarding student officer engagement should include a prohibition on attending schools to investigate matters which do not have an impact on school climate unless (a) there are legitimate concerns about the loss of evidence, or (b) failure to investigate will result in harm to an identifiable person.	Reference response to #23
27a	Investigating incidents that have no impact on school climate	Reference response to #23
27a i	The OHRC recommends that officers are prohibited from attending schools to investigate matters which do not have an impact on school climate.	Reference response to #23
27a ii	Officers should only engage students on school property to investigate an incident that has no impact on the school climate when: (a) there are legitimate concerns about the loss of evidence, or (b) failure to investigate will result in harm to an identifiable person.	Reference response to #23
IV. DATA COLLECTION		
	Human Rights-Based Data Collection	
28	The PRP should work with an independent expert mutually agreed upon by the OHRC and the PRP to create a policy on human rights-based data collection that ensures protection of privacy, involvement of affected	Peel Regional Police (PRP) has engaged Professor Lorne Foster, Professor Les Jacobs and Professor Akwasi Owusu-Bempah

	communities, and limits the use of the data to human rights-related purposes only.	
29	PRP should develop race and identity-based data community advisory panel (CAP). The panel should include members of the Indigenous, Black, South Asian, and other racialized communities, ideally with expertise in data management whenever possible. The CAP members should provide input on PRP, RIBDC initiatives. The CAP should not replace ongoing community consultation.	As part of the engagement of Ontario Human rights Commission (OHRC), Peel Regional Police (PRP) is committed to creating a Race and Identity-Based Data (RIBD) Community Advisory Panel (CAP).
30	PRP will continue to, in a phased approach, make their race and identity-based data publicly available, formatted for public consumption, shared online[5] and analyzed in a manner that does not contribute to, or stigmatize racialized groups.	Peel Regional Police (PRP) is in the 3rd year of this journey (phased approach) and will continue to report publicly and will not stigmatize or criminalize racialized communities.
31	Collect, analyze and publicly release human rights-based data on an annual basis, along with relevant intersectional identity data, on the full range of police-civilian interactions, including stop and question activities, traffic and pedestrian stops, charges, arrests, releases and use of force. This should include:	Agree
31a	Incidents where officers are required to complete a use of force report and where a civilian sustains a physical injury as a result of force being used, regardless of the extent of any such injury or medical treatment received (“use of force incidents that result in physical injuries”); which includes:	Agree

<p>i. Race, Indigenous ancestry, age and gender of the subject</p> <p>ii. Whether the subject had or was perceived to have a mental health disability, was experiencing a mental health crisis or was intoxicated on drugs or alcohol at the time of incident</p> <p>iii. Number of subjects directly engaged during the interaction</p> <p>iv. All type(s) and levels of force used and their sequence</p> <p>v. Name, age, race, gender, rank, badge number, years of experience, assignment, platoon, unit and division of the officer(s) who used force</p> <p>vi. Location where the use of force occurred, including postal code, patrol zone and X-Y coordinates</p> <p>vii. Location where the subject lived, including postal code and patrol zone</p> <p>viii. Any injuries sustained by the officer and/or the subject and medical services requested or received</p> <p>ix. A detailed description of the circumstances and the subject's actions that led to the use of force including:</p> <ol style="list-style-type: none"> 1. The reason for the initial stop or enforcement action 2. Whether the incident occurred during an officer-initiated contact or a call for service 3. Whether the subject was in possession of a weapon, the type of weapon and when the police became aware that the subject 	
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<p>possessed the weapon (i.e. before use of force or after arrest)</p> <p>4. Whether the subject was handcuffed or otherwise restrained during the use of force</p> <p>x. Whether the subject was charged with an offence, and, if so, which offence(s) and their disposition</p> <p>xi. Whether a search was conducted of the subject, and if so, when and on what basis the search was made; and the level of search conducted</p> <p>xii. Whether, when and how verbal or other de-escalation techniques were employed</p> <p>xiii. Whether the SIU was notified of an incident, and if so, when</p> <p>xiv. For firearms-related incidents where an officer discharged a firearm, the number of shots fired by each involved officer and the accuracy of the shots</p> <p>xv. For incidents where an officer discharged a conducted energy weapon, the number of times it was discharged by each involved officer, the mode it was in when discharged (drive stun or full deployment) and where on the subject it was discharged each time</p> <p>xvi. The length of time between the use of force and the completion of each step of the force investigation and review</p> <p>xvii. Presence or absence of body worn camera and time stamping of when it was turned off and on within the five hours before and after the incident.</p>	
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<p>31b</p>	<p>Detention, charge, arrest and release decisions; which includes:</p> <ol style="list-style-type: none"> 1. Information about the person charged/arrested/released, including <ol style="list-style-type: none"> 1. Race 2. Indigenous ancestry 3. Age 4. Gender 5. Whether the subject had or was perceived to have a mental health disability. i. Information about any conditions of release imposed, such as any undertakings required for release; and ii. Any determination to detain the person for a bail hearing (i.e., a show cause hearing), including the factors used to determine the need to detain the person. iii. Information on chargeable persons who are not charged due to criminal incidents being "cleared otherwise," including a specific breakdown of all UCR "cleared otherwise" categories (e.g., "departmental discretion," "diversion program," "incident cleared by a lesser statute," etc.). 	<p>Agree</p>
<p>31c</p>	<p>Where the data reveals race-based disparities in service delivery, the PRP should take immediate steps to inform the PRPSB, and enact an action plan to eliminate the disparity within one year.</p>	<p>Agree</p>

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31d	PRP should expand its race data collection efforts to include data on wrongful convictions; low-level administration of justice charges, data on response times, police stops and diverted charges and strip searches.	Agree
31e	PRP should collect self reported data from individuals they interact with through post engagement surveys.	Agree
32	PRP should	
32a	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. PRP should post all data collected pursuant to the Data Collection Policy and RIBDC initiatives to the open data portal, subject to privacy and other considerations. This should include a location-based analysis of use of force patterns across Peel, and a strategy to address any disparities that emerge.	Agree
32b	Develop privacy guidelines for the collection, use and disclosure of human rights data in consultation with the Information and Privacy Commissioner of Ontario;	Agree
33	PRP should require all senior managers and data specialists to undergo training on Ontario's Data Standards for the Identification and Monitoring of Systemic Racism.	Agree
34	PRP should collect data on (1) number of calls received concerning children 12 and under, (2) calls PRP responded to for children under 12, (3) calls responded to for children under 12,	Peel Regional Police (PRP) continues to evolve is the Race and Identity Based Data (RIBD) reporting and will take a phased approach to this recommendation.

	and (4) the number of referrals to community organizations, children's aid societies, or families that were made in response to these calls for children under 12.	
35	PRP and PPSB should amend their policies and directives related to race data collection and use of force to remove any prohibition on the use of race-based data in performance management. This data should be used when evaluating officer performance.	Peel Regional Police (PRP) Race and Identify Based Data (RIBD) collection is in the beginning of implementation for a strategy that will continue to evolve into more complex collection and analysis. PRP will take a phased approach over multiple years to RIBD that will focus on systemic discrimination as set out in the Anti-Racism Act and not used for individual performance indicators.
V. MONITORING AND ACCOUNTABILITY		
	Monitoring Legal Decisions	
36	PRP should Establish a process within the service to search and track negative findings about an officer's testimony or conduct in decisions of courts or tribunals, correspondence from the OIPRD, LECA, SIU Director, or any legal decision involving a Charter breach that reflects conduct consistent with Anti-Black racism, racial profiling, or discrimination. This process should help supervisors review these concerns in one centralized location	This is already addressed in the Internal Affairs (I.A.) Pro system.
37	The PPSB should develop a policy which sets out the steps for receiving, implementing and publicly reporting on all recommendations from coroner's inquests directed to the PRP or PPSB, or recommendations directed to all police services in Ontario.	Agree

	Body Worn Cameras	
38	If PRP proceeds with deploying body worn cameras to frontline officers, they shall develop and implement a policy governing the use of the body-worn cameras that includes:	
38 a	<p>Clear criteria for when officers must record, and require officers to provide concrete, simultaneous justifications on camera for failing to record required events. For example, officers should begin recording at the earliest opportunity, prior to any contact with a member of the public, whenever that contact is for an investigative or enforcement purpose, and regardless of whether or not the person is within camera view, unless an exception applies.[1] Officers should not record the following interactions:</p> <p>(i) unauthorized surreptitious conversations with any person;</p> <p>(ii) a strip search and/or body cavity search under any circumstance;</p> <p>(iii) attendance in a courthouse, except in exigent circumstances, or under legal authority;</p> <p>(iv) attendance at a designated healthcare facility, except for the following:</p> <ul style="list-style-type: none"> • under exigent circumstances; 	This Recommendation has already been accounted for in the Body Worn Camera Directive: IB-173-F.

<ul style="list-style-type: none"> • under the authority of prior judicial authorization; • where Officers have custody of a person who is being treated or is waiting for health care treatment and the Officers are alone with that person; • where the Officer has custody of a person who is being treated, or is waiting for health care treatment, and the Officer reasonably believes that the interaction between the Officer and the person in their custody requires or might soon require the use of force; or, • with the express consent of the person is the subject of the recording; and, <p>(v) patient care from a Paramedic, except under exigent circumstances.</p> <p>(vi) during policing-civilian contact or activities that are not investigative or enforcement in nature (e.g., informal interactions)</p> <p>(vii) in a private dwelling unless: there are exigent circumstances, under the legal authority of a warrant, in a situation where an officer's lawful presence in a private place is conditional on the owner's/occupant's consent to being recorded, and the officer has provided the owner/occupant with a reasonable opportunity to refuse such consent. If the owner/occupant</p>	
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	<p>requests that the interaction not be recorded, the officer must stop recording</p> <p>(viii) Recording in religious and spiritual places except, in relation to a specific investigative or enforcement purpose</p>	
<p>38 b</p>	<p>(b) Police policies and procedures should provide that if a member of the public requests that an officer stop recording or refrain from recording in circumstances where the officer is required or permitted to record and the individual is not being detained or under arrest, the officer must: (i) inform the individual that while the camera must stay on, they are free to discontinue the interaction, including by leaving the scene (ii) respect their right to do so</p>	<p>Directive: IB-173-F will be updated to reflect this recommendation.</p>
<p>38c</p>	<p>Addressing personal privacy concerns by specifically, among other things, protecting categories of vulnerable individuals (e.g., victims of sexual assault) from being recorded without their informed consent. Privacy guidelines should be developed in consultation with the Information and Privacy Commissioner of Ontario</p>	<p>This Recommendation has already been accounted for in the BWC Directive: IB-173-F.</p>

38d	Requiring officers to file an initial written report or statement before relevant footage is reviewed, for all incidents;	This Recommendation has already been accounted for in the BWC Directive: IB-173-F.
38e	Requiring the police service to delete all footage within two - three years, with exceptions for recordings that have been determined to be relevant to a criminal or civil investigation or proceeding, including officer disciplinary proceedings	Records and Information Management system retention policy is in place.
38f	Expressly prohibiting both footage tampering and unauthorized access, and ensuring that all access to recorded footage will be logged or audited;	Our Digital Evidence Management System, Evidence.com has been built with a robust auditing process. Officers do not have administrative permissions to edit or delete footage captured by their Body-Worn Camera.
38g	Expressly allowing individuals who are filing police misconduct complaints to view all relevant footage in an accessible and expedient manner;	Upon making arrangements with a Divisional Commander, a member of the public will have the ability to view footage but will not be able to retrieve a copy outside of the necessary Freedom of Information requests.
38h	Prohibit the use of biometric technologies (e.g., facial recognition, including mug shot databases) to identify individuals in footage;	Body-Worn Camera footage will not be used as a facial recognition tool.
38i	Criteria for when body-worn camera footage will be accessible including:	
38j	Body-worn cameras shall be clearly affixed to an officer's uniform;	Clear direction has been provided to officers through their Body-Worn Camera training and the existing policy. The camera is affixed to the officer's vest, centre mass, and must remain clear and unobstructed.
38k	Monitor and report publicly each year on the extent to which BWC are used in each division, and collect disaggregated race based statistics on interactions captured by the use of body-worn cameras. This information should be	PRP has included a reporting structure and schedule through the Peel Regional Police Service's Board Policy. PRP is currently collaborating with the Ontario Tech / York Research Team to develop a methodology,

	collected, analyzed and publicly reported on as part of PRP's Human Rights Data Collection Strategy.	and data collection instruments to collect and analyze data for police interactions with members of the public.
39	PRP should develop detailed procedures on the use of body-worn cameras in line with the policy prescriptions above, and ensure officers are appropriately trained on these procedures. In addition:	Peel Regional Police has policy and procedures that governs the use of the Body-Worn Cameras. PRP developed a training program that ensures that all users receive appropriate and adequate training on the use of the camera and ensure that there is compliance with respect to its operational use, and the related policies and procedures.
39a	Specify the frequency of reviews and require public reporting on them. The OHRC further recommends that at least quarterly, supervisors conduct both systematic and random audits of the body-worn and in-car camera recordings of officers under their command, to assess if officers are providing a service environment free from racial discrimination. The OHRC recommends that these reviews make sure footage from all front-line officers' BWCs is audited at least every two years	All Divisions audit compliance monthly. PRP reports to the Board annually.
39b	Require reporting to the PPSB (subject to confidentiality limitation in the PSA) on the quantity and quality of supervisors' audits related to discrimination every year. In this reporting, identify how many instances of potential racial bias were identified, how many internal conduct complaints were initiated based on reviewing BWC footage, and the nature of any remediation or discipline of individual officers that followed	Will commence in 2024
	Early Warning System	

<p>40</p>	<p>PRP should establish an Early Warning System (“EWS”) that captures all necessary information to alert supervisors to individual, platoon/unit/division conduct that needs to be addressed from the perspective of potential racial discrimination. This system should capture and flag patterns related to racial disproportionalities and disparities, including any race or identity based data collected by PRP regarding the services provided by an officer that indicates a disparity or disproportionality.</p> <p>Once this data is flagged by an EWS system it should be analysed before further action is taken.</p>	<p>I.A. Pro is PRP’s Early Warning System (“EWS”). Directive I-A-158(F)* – Racial Profiling section C.F.5. addresses capturing racial profiling in the I.A. Pro system: Section C.F.5. “The Officer in Charge (O.I.C.), Professional Standards shall ensure allegations of racial profiling are entered into the I.A. Pro System.”</p>
<p>41</p>	<p>The Early Warning System should capture Charter Violations and</p> <ol style="list-style-type: none"> a. Violations of the PRP body-worn and in-car camera procedures b. All instances where the PRP learns: <ol style="list-style-type: none"> i. A decision not to prosecute any charge or ticket was based on concerns of the Crown Attorney about an officer’s credibility ii. A court or tribunal has made a negative credibility determination on an officer iii. A court or tribunal has concluded that race or a race-related prohibited ground under the Human Rights Code was a factor in an officer’s conduct iv. An officer violated the Charter rights of a civilian, regardless of the court’s decision to 	<p>PRP will ensure the updated to the EWS include Charter violations.</p>

	<p>include or exclude the evidence flowing from the Charter breach</p> <p>c. All internal and external misconduct complaints that allege racial discrimination or discrimination based on related prohibited grounds (e.g. place of origin or ethnic origin), including their disposition</p> <p>d. All civil, human rights or administrative claims that allege racial discrimination or discrimination based on related prohibited grounds filed with or against the PRP, chief or the PPSB that result from the actions of PRP officers</p> <p>e. All disciplinary action taken against officers for racial discrimination or discrimination based on related prohibited grounds</p> <p>f. All non-disciplinary corrective action required of officers due to racial discrimination or discrimination based on related prohibited grounds</p>	
41a	<p>The Chief of Police should ensure use of force incidents are captured and reviewed by a supervisor to allow for PRP to be proactive in the early detection and prevention process.</p>	<p>A supervisor is notified of all use of force incidents and reviews the BWC footage. A Staff Sergeant and Incident Response supervisor reviews all Use of Force Reports.</p>
41b	<p>If, in the course of the audits, the Body Worn Camera Unit discovers evidence of actions that may constitute misconduct, including allegations of racial discrimination, the matter will be referred for investigation under the Police Services Act.</p>	<p>PRP will formalize a new area dedicated to performing random audits and ensure each officer is audited every 2-years, which is approximately 200 officers every quarter. Audits will focus on the proper use of BWC (right time / right place) but not on racial discrimination. Specific audits will be conducted if there are complaints from the public / internal of racial discrimination.</p>

		Note: At this time, PRP does not have plans to implement in-car cameras.
41c	PRP reports on the audits every year, and this reporting should identify how many instances of potential racial bias were identified, how many internal conduct complaints were initiated based on reviewing body-worn camera footage, and whether there was any remediation or discipline of individual officers that followed.	The Human Rights project with input from the Race-based data collection experts and the Privacy Commission will establish data to be collected, data sharing standards, data governance, recognition and correction of race-based disparities including and not limited to applicable systems / databases required to capture and analyze data. In addition, PRP's training will be aligned to ensure our officers are trained in data collection.
41d	When remedial efforts have not successfully addressed concerns about a pattern of racial disparity in an individual officer's activities, supervisors should consider if it is appropriate to refer the officer's conduct to Professional Standards.	PRP directives, Racial Profiling I-B-158(F) refers to supervisors shall take corrective action when discrimination is identified. PRP directive Code of Ethics, Conduct and Discipline I-A-204(F) establishes that a supervisor is accountable to take appropriate steps for corrective discipline. This directive outlines the steps for progressive discipline which includes investigations by Professional Standards for misconduct when necessary.
	Accountability	
	The Chief should:	
42a	Consider formal findings of misconduct under the Police Services Act, including those where there is a finding of racial discrimination, as a negative factor in promotional decisions.	The Police Services Act, Part V provides a complete code to discipline of sworn police officers in Ontario. We cannot discipline an officer without following the mandatory of the Act. To consider a finding, without affording procedural fairness and opportunity to respond would be considered as disguised discipline and would be subject to appeal. It would further be contrary to the Collective Agreement

		<p>This is addressed in the draft regulations to COPSA. All findings from HRTO re: racial discrimination must be referred to OIPRD for investigation.</p> <p>We can confirm that Formal findings of misconduct under the Police Services Act, including those where there is a finding of racial discrimination, will be considered as a negative factor in promotional decisions</p>
42b	<p>Where it becomes apparent during the course of an Investigation under Part V of the Police Services Act, that there may be allegations, or evidence regarding potential racial profiling or discrimination in allegations of officer misconduct against racialized individuals, the Investigator will proactively investigate those allegations, even where claims of racial profiling or discrimination are not explicitly raised by a complainant, witness, SIU Director, OIPRD, or any legal decision involving a Charter breach by the PRP.;</p>	<p>Agree</p>
42c	<p>Investigate each allegation of officer misconduct raised by the SIU Director in letters to the Chief;</p>	<p>The SIU is mandated to investigate incidents that result in injury due to interactions with the police. SIU investigations are limited to criminality.</p> <p>Following the completion of the SIU investigation and subsequent report to the Attorney General, the Director issues a letter and report to the Chief of Police.</p> <p>The Chief of Police or designate then conducts an Administrative Review.</p>

		<p>Procedures - Special Investigations Unit Directive I-B-721(F)</p> <p>(G) Responsibilities – Investigative Support Bureau</p> <p>(1) The Investigative Support Bureau shall:</p> <p>(b) Conduct the administrative investigation for the purpose of reviewing procedures, processes and practices of P.R.P. in relation to all incidents under investigation by the S.I.U.; and,</p> <p>(c) Direct the investigation into the criminal conduct of any person injured in the Occurrence, who forms the basis of the S.I.U. investigation.</p> <p>(l) Report to the Peel Police Services Board</p> <p>(1) The Chief of Police or designate shall report any findings, and any action taken or recommended to the Peel Police Services Board (P.S.B.) within 30 days after the S.I.U. investigation report has been submitted to the Attorney General.</p> <p>Criminal Investigations Directive I-B-722(F)</p> <p>(l) Professional Standards</p> <p>1. The Inspector, Professional Standards shall oversee investigations relating to code of ethics, conduct and discipline. The responsibility of Professional Standards personnel shall be as follows:</p> <p>(a) Investigative Support Bureau shall:</p>
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		<ul style="list-style-type: none">(i) Conduct the administrative investigation, on behalf of this Service, of all Occurrences where the S.I.U. has invoked their mandate; and,(ii) Coordinate all P.R.P. investigations which fall within the mandate of the S.I.U., including:<ul style="list-style-type: none">1. all Occurrences resulting from the discharge of a P.R.P. Officer's firearm at a person, where no injury occurs;2. Shootings involving Police Officers, where death or injury occurs; and,3. Deaths or injury which occur while a person is in custody; and,(iii) Monitor and report to the Chief of Police, on any recommendations from a Coroner's Inquest that directly relates to the P.R.P.; and, <p>Incident Response Review Committee Directive I-A-810(F)</p> <p>(C) Incident Response Review Committee</p> <p>(1) The Incident Response Review Committee is a standing committee as defined in Peel Regional Police (P.R.P.) Directive I-A-810(O), or any other directives dealing with "Standing Committee Reporting Policy", and shall:</p>
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		<p>(c) Have a mandate that includes the following:</p> <ul style="list-style-type: none"> (i) Review Use of Force reports and incidents to identify trends or other areas of concern; (ii) Provide recommendations regarding training needs or adjustments; (iii) Provide recommendations regarding changes to policies or procedures; (iv) Provide recommendations regarding incident response equipment; and (v) Review any Administrative Review as assigned to the Committee by C.M.G <p>These three procedures all speak to the investigation to be conducted by the Investigative Support Bureau following a SIU investigation and subsequent letter to the Chief. There is also a stop gap in place with the IRRC looking at everything after both a SIU Investigation and an Investigative Support Bureau Investigation.</p>
42d	<p>The Chief shall automatically initiate a Chief's complaint investigation when findings or comments in decisions of the Human Rights Tribunal of Ontario, courts, correspondence from the OIPRD, SIU Director, or any legal decision involving a Charter breach by the PRP reflect conduct consistent with racial profiling or discrimination, if an investigation has not already been undertaken.</p>	<p>PRP is confirming this recommendation as 'Complete' since Crowns are duty bound; these incidents would always be investigated by Internal Affairs.</p>
42e	<p>Establish a process by which misconduct flagged by the SIU or otherwise identified by PRP that is consistent with racial profiling or</p>	<p>This recommendation is the same as 41. Currently, this is not a statistic that PRP captures; therefore, the Chief does not have this information to</p>

	<p>discrimination is investigated and require the Chief to report to the Board regarding the findings and outcome of the investigation, including any discipline imposed. The Board may publish subject to the confidentiality concerns outlined in the Police Services Act or raised by affected parties; and</p> <p>(58g) Ensure that all Professional Standards investigators are trained to identify violations of the Human Rights Code, including potential racial profiling/discrimination.</p>	<p>be reported; however, as part the Human Rights project, the Human-Rights data collection team will perform feasibility analysis in accordance with the Comprehensive Ontario Police Service Act (COPSA), the Data Protection and Privacy Act to establish data pertaining to racial profiling and develop systems / processes / reports to collect data.</p> <p>This information will be collected in the Internal Affairs (I.A.) Pro system. and the Chief will report annually to the Board, subject to appropriate vetting in accordance with the requirements of the Police Services Act</p>
43	The OHRC recommends that the Peel Police Services Board establish policies to:	
43a	Review the chief of police's administration of:	
43a i	Internal complaints when there are HRTO, court or tribunal findings of racial profiling or racial discrimination, or officer conduct consistent with racial profiling or racial discrimination, and report publicly, on an annual basis about this.	Agree
43a ii	Section 11 reports.	Public - available online
43a iii	Request and review decision letters from the SIU Director to the Chief. The OHRC recommends that the PRP Special Investigations Unit Procedure (13–16) be amended to direct the PRP to include a copy of the SIU Director's Letter to the Chief with the Section 11 report when it is sent to the PPSB.	

43b	Request and review decision letters from the SIU Director to the Chief	The Chief will provide decision letters to the Board along with Section 11 Reports
44	As part of the PPSB's ongoing responsibility to review the Chief's administration of the complaint system, PPSB should continue to direct the Chief of police to report on the aggregate number of instances where informal discipline is used to address conduct consistent with racial discrimination, subject to the confidentiality provisions of the PSA. This may take the form of public reports which do not identify the parties involved.	Agree
45	The Chief of Police should produce and provide to the PPSB an annual list of all recognized instances of racial profiling and racial discrimination committed by police officers through decisions of the Human Rights Tribunal of Ontario, courts, and Disciplinary Tribunal, along with details on what corrective or disciplinary actions were taken in response, subject to the confidentiality provisions of the Police Services Act.	Agree
45a	This list should be publicly released annually and not include information that would violate the confidentiality provisions of the Police Services Act.	Agree
45b	PRP should publish clear and transparent policies in place to address instances of racial bias or excessive use of force	Agree
VI. ORGANIZATIONAL CHANGE		
	Training	

46	PRP should work with Black communities and one or more external experts agreed upon by the OHRC to develop and implement regular, detailed, scenario-based and ongoing human rights-focused training, to new recruits, current officers, investigators and supervisors on:	<p>Peel Regional Police implemented a Human Rights centred new training strategy based on OHRC recommendations. Worked with SMEs including Professor Owusu-Bempah, Child Psychologists and the Canadian Mental Health Association Peel Dufferin. With this expert oversight, PRP has chartered the following course.</p> <p>Implicit Bias awareness is being weaved through all aspects of our training from a self-awareness perspective. This will increase an officer’s knowledge, skills and abilities in the following FIVE pillars:</p> <ol style="list-style-type: none"> 1. History of Racism in Canada - Including history of negative police interactions with various community groups. The focus will be to educate on our own past and policing within the context of it, how this negative portrayal results in bias, both conscious and unconscious being formed by officers towards Black Indigenous and racialized populations. 2. Unconscious Bias Awareness Training – discussing and defining racism, discrimination and biases, both conscious and unconscious. Where our biases come from and how being a police officer can lead to further biases. Officers will learn the impacts of these on our community and those relationships. Officers will also learn strategies for recognizing and acknowledging their biases and ways to counter them. This includes dealing with fears and anxieties from biases that may influence their decision-making.
46a	Racial profiling, racial discrimination and service outcomes based on application of unconscious/implicit bias;	
46b	Developing concrete strategies for acknowledging and monitoring officers’ own biases;	
46c	Crisis Prevention Intervention and using a trauma-informed approach to policing; Provide new recruits and experienced officers with training on techniques for containing crisis situations wherever possible to slow down the course of events and permit the involvement of specialized teams such as the Mobile Crisis Rapid Response Team if required (Carby Inquest);	
46d	The use of force continuum with an emphasis on verbal communication and de-escalation	
46e	Using the circumstances of the Jermaine Carby shooting as a training scenario to examine whether new recruits or experienced officers demonstrate awareness of issues regarding: <ol style="list-style-type: none"> i. "unconscious bias" in the exercise of police discretion concerning traffic stops, ii. the most effective methods of de-escalation, if the need develops, and 	

	iii. decision-making to select the lowest level of force appropriate if use of force should be required (Carby Inquest);	<p>3. Procedural Justice – How taking a human rights approach, being respectful and showing dignity in all interactions help shape the communities view and opinion of the police. Officers will learn the need and benefits to being fair and impartial. This includes being fair in processes (including using discretion when appropriate), being transparent in actions, providing opportunity for voice and being impartial in decision making. Officers will adopt the view that community members as partners in public safety.</p> <p>4. Trauma Informed Approach – includes defining trauma, the effects of trauma and types of trauma including intergenerational and historical trauma. Officers will learn to recognize that aggression may be a result of a past trauma. This is about educating officers to recognize situations where they are met with aggression and negative comments, may be a result of the person having experienced past traumatic events including negative police interactions, whether their own experience or perceived. Officers will be educated on taking a trauma informed approach so that they apply different lens to interpreting their response while recognizing their own biases.</p> <p>5. Authorities – Officers will receive a review and comprehension of various legislation including the Charter, Collection of Identifying information</p>
46f	<p>Providing specific training relating to situations involving persons with an edged weapon,</p> <p>i. where the person has failed to respond and/or comply with police commands (i.e. “Drop the knife”), train officers to stop shouting those commands and to attempt different defusing communication strategies, and</p> <p>ii. train officers in such situations to coordinate amongst themselves so that one officer takes the lead in communicating with the person so that not all officers are shouting simultaneously (Carby Inquest);</p>	
46g	The impact of racial profiling, racial discrimination and unconscious/implicit bias on community police relations ;	
46h	The protection of human rights as central to the police mandate and essential to effective policing (per the Police Services Act and the Comprehensive Ontario Police Services Act, 2019);	
46i	How racialized persons who reasonably believe that they are being racially profiled may find the experience upsetting and might react in a disrespectful manner. Officer should use a trauma informed approach and exercise reasonable tolerance when a person is using disrespectful language in this context. Officers should not view a person’s use of language in	

	this regard as the basis for differential treatment.	<p>in Certain Circumstances (CIICC, street checks), Ontario Human Rights Code, Ontario Police Service, Federal and Provincial statutes and Anti-Racism Act Data Standards.</p> <p>The synergy of this training will give officers a holistic view of Biases in policing and the awareness, recognition and strategies to change their behavioural responses to interactions with Black Indigenous and racialized populations. Building upon these training pillars, officers will receive further training in the following;</p> <p>Crisis intervention and de-escalation – The focus of this training will be understanding mental illnesses, self awareness, effective communication and de-escalation techniques. Officers will be taught to slow down events / interactions when possible and utilize specialized resources such as MCRRT and Crisis negotiators. This includes how to tolerate abuse and control one’s own emotions when de-escalating a situation. Officers will also be taught to utilize different communication strategies instead of repeating the same commands and the best practices of having one officer take the lead when communicating to a person. PRP is marking this as ‘complete’ since training in currently in place to align with the recommendation;</p> <p>PRP is marking this as ‘Complete’ since training in currently in place to align with the recommendation;</p>
46j	How to recognize and deal with fears, anxieties or biases that may contribute to their use of force decisions;	
46k	The nature and historical context of racism, including its particular origins and impact on Black communities;	
46l	How racial profiling and racial discrimination violate the Code, Charter, Police Services Act and the Comprehensive Ontario Police Services Act, 2019 with references to relevant case law;	
46m	How officer deployment and artificial intelligence can contribute to racial profiling and racial discrimination	
46n	Effective community relations, including viewing members of the community as partners in public safety;	
46o	Ensure that officers are trained and encouraged to intervene when they witness misconduct, including inappropriate or excessive use of force, or racially biased policing, being committed by another officer;	
46p	Alternatives to charges, such as issuing a caution or extrajudicial sanctions;	
46q	The principles that apply to claims of racial discrimination, such as how intent is not required and how it may be proven by circumstantial evidence and inference;	
46r	Provide new recruits and experienced officers with enhanced training regarding in-cruiser databases such as the Canadian Police	

	Information Centre (C.P.I.C.) and the information they contain (Carby Inquest); and	
46s	Provide new recruits and experienced officers with additional training regarding effective communication of relevant C.P.I.C. and current situation information with other officers at the scene so that all officers share a common understanding of the situation and approach (Carby Inquest).	PRP is marking this as 'Complete' since training is currently in place to align with the recommendation;
47	Consider the most appropriate methods (including external consultation) to measure whether the training has been effectively delivered and absorbed by those receiving the training in recommendations.	PRP in collaboration with OHRC, Anti-Racism Advisory Committee, the Data and training experts will identify measures for validating the effectiveness of training. The derived key performance indicators will be detailed in the Multi-Year action plan PRP is required to publish pertaining to the OHRC recommendations.
47a	Develop a method to objectively measure the effectiveness of officer training (both initial and continuing) for unconscious bias, mental health issues, de-escalation and use of force. Officers should be tested, graded and must meet a benchmark in order to pass (Carby Inquest).	Today, PRP conducts annual measurements on the use of force; however, PRP will take this recommendation under advisement and with input from the anti-racism, crisis intervention, de-escalation expert, identify methods to measure the effectiveness of PRP's new heightened training program within the context of the recommendation. In addition, PRP's Regional Community Mobilization (RCM) is currently developing a comprehensive "Response to Mental Health and Addiction Strategy". All the findings, a comprehensive training plan and key performance indicators will be published in the Multi-Year action plan PRP will deliver as part of the OHRC recommendations.
	PRP should ensure that the training:	

48a	Is developed in partnership with external training experts familiar with pedagogical best practices including effective design and evaluation;	Refer to Section 46 response on training strategy in addition to working document.
48b	Includes an attitudinal component using scenario-driven learning modules to facilitate the identification of racial profiling and racial discrimination in investigations, including scenarios dealing with suspect selection, detention, searches, charges, arrests, use of force and conflict de-escalation;	
48c	Is evaluated on an ongoing basis. Officers should pass training or demonstrate through the annual requalification process that lessons have been absorbed and retained. This evaluation should include an assessment of officers' skill in handling in mental health and/or addictions, anti-racism, de-escalation and crisis communication, etc;	
48d	Is connected to policies and procedures around racial profiling and racial discrimination, and specifically identifying and countering Anti-Black racism in stop, question and searches; charges and arrests; and use of force;	
48e	Is evaluated with reference to outcome measures pertaining to disparity reductions (or a lack thereof) in stops, searches, use of force and other police practices, as well as external independent audits of show cause reports, particularly the subjective character/personality assessment elements of such reports; and	
48f	Development and implementation includes active and ongoing involvement by racialized	

	communities, primarily those that identify as Black, as well as those who identify as Indigenous and	
49	PRP should amend the Use of Force recertification to include qualification in areas such as mental health and/or addictions, anti-racism, particularly Anti-Black racism, racial profiling and its sources including systemic, conscious, and unconscious bias, fear inoculation, de-escalation and crisis communication.	Training strategy in place
50	PRP should ensure Divisional Mobilization Unit officers receive specialized training on engaging with racialized youth and de-escalating situations with youth in age-appropriate ways.	All PRP officers will complete the 5 Pillars of Human Rights Focused Training as mentioned in '12q' and complete their Incident Response Training twice per year that enhances de-escalation techniques. The delivery of this training provides knowledge skills and abilities to assist with the engaging of all racialized persons including, youth, and de-escalation techniques. PRP members will also receive training on racialized youths and lived experiences from their interactions with Peel Regional Police Officers.
51	Enhance efforts to ensure that officers are fit for service before they engage with the community.	Reference the Directive I-A-244(F) Fit-for-Duty
	Reducing the Scope of Police Activities	
52	PRP should deploy a Mobile Crisis Rapid Response Team (MCRRT) to emergency priority calls that have a known element of mental health that is contributing (crisis) to the incident. All efforts to reduce the crisis including de-escalation techniques both physically and	In many instances, the types of calls PRP receive do not contain sufficient information to determine alternative options (e.g. 9-1-1 hang-ups). PRP will engage Crisis workers. Currently, the Mental Health Act, Section 17 requires Police to be the first responders in a crisis situation. An

	<p>psychologically should be made. PRP should make it a priority to build partnerships with mental health professionals with capacity to support first responder or community lead response to mental health calls.</p> <p>Priority should also be placed to leverage innovative tools that increase the connection or support from a mental health professional(s) during calls where mental health is a known contributing factor.</p>	<p>amendment to the Act is necessary to allow for Mental Health Crisis workers to be first responders in a Crisis Situation. However, PRP as part of the Community Safety and Well-being plan, PRP is working with our community partners in the Canadian Mental Health Association (CMHA) to derive a new working model where a mental Health Crisis worker accompanies the Police to a crisis situation. However, there are challenges such as Police operate a 24/7/365 days a year while the vast majority of our partners do not and funding shortfall for our partners equate to lack of resources to assume lead roles in responding to crisis situations.</p>
53	<p>PRP should publicly release information annually about officer activities, in a way that enables the public to understand how officer time is spent.</p> <p>This should work towards including a break down of how long a front line officer spends responding on calls or engage in proactive enforcement during a typical shift. Categories such as responding to non-criminal calls, traffic, other crime, property crime, medical, person in crisis, violent crime or proactive enforcement. Similar categories are used in some US jurisdictions. These categories can be used along with the information provided about priority calls in the current annual reports.</p>	<p>Currently, we do not capture this data. However, as part of the Human Rights project, the Human-Rights data collection team will perform feasibility analysis in accordance with the Comprehensive Ontario Police Service Act (COPSA), and the Data Protection and Privacy Act to establish data pertaining to racial profiling and develop systems / processes / reports to collect data.</p>
54	<p>PRP should publicly release information annually about the calls for service it receives, in a way that enables the public to understand</p>	<p>Agree</p>

	how many calls relate to social issues, for example mental health, addictions, or homelessness.	
55	PRP and PPSB should support the development and expansion of civilian-led mental health crisis responders.	Agree
56	PRP should continue to work with CMHA Peel Dufferin, Punjabi Community Health Services (PCHS) and Roots Community Services or other service providers to improve access to community crisis workers in order to better respond to mental health calls reported to PRP.	Agree
Diversity in Employment		
57	PRP should conduct and publicly report on a workplace census every two years.	Agree
58	PRP should publicly commit to working toward ensuring the police service and its leadership is as diverse as the community it serves by 2025, including in supervisory and leadership positions.	The practice of publically sharing PRP's current and proposed diversity composition has been in place since 2019.
59	PRP should work with an external expert to ensure that the psychological testing that PRP requires new applicants to undergo includes testing of the applicant's biases and abilities to appropriately handle crisis situations. This data should be used to support ongoing training and development.	PRP has already collaborated with external experts and have implemented advanced psychological testing for all new applicants which has been in place since September 2019 exceeding this recommendation... Testing includes the following; 1. The MMPI-2 RF test provides information on a candidate's psychopathology such as the absence of depression or anxiety and negative personality traits such as antisocial tendencies and narcissism however it is not designed to identify a person's strengths including resiliency, decision making abilities and judgement or

		<p>positive traits such as team player, honesty and reliability.</p> <ol style="list-style-type: none"> 2. Sixteen (16) Personality Factors Inventory (16PF) which is a police related assessment tool used to summarize 16 personality factors that can help to assess a candidate’s tendency toward resiliency and positive personality traits. 3. Matrix-Predictive Uniform Law Enforcement Selection Evaluation Inventory (M-Pulse) is designed to identify a candidate’s liability potential to predict officer misconduct, gauges attitudes, racial bias and beliefs and facets of personality that are of prime importance to police work. Specifically designed for law enforcement and is currently in use by agencies in Canada and the United States. 4. Connor-Davidsons Resiliency scale (CD-RISC) is designed to investigate how candidates cope with stress and assist in screening individuals for high-risk and high-stress activity. 5. The data is then reviewed by a registered Psychologist and a clinical interview occurs resulting in a report and recommendation for hire if suitable which is submitted to PRP.
60	<p>PRP should establish Key Performance Indicators, benchmarks and targets on their employment equity initiatives and publicly report on this to the Peel Regional Police Services Board (PPSB) annually.[9]</p>	<p>In September 2020, PRP released the results of the workplace census and subsequently developed a framework for annual execution including Key Performance Indicators, benchmarks and targets for PRP’s employment equity.</p>

61	When making decisions about promotions, supervisors should consider an officer's skill and experience in dealing with Emotionally Disturbed Persons (EDPs), members of the Black community and racialized communities, including their ability to de-escalate and negotiate during crisis situations. Outreach and engagement with racialized communities and involvement with anti-racist work should also be considered	Currently, PRP does not capture statistics pertaining to this recommendation; however, as part the Human Rights project, the Human-Rights data collection team will perform feasibility analysis in accordance with the Comprehensive Ontario Police Service Act (COPSA), and Privacy Act to establish data pertaining to racial profiling and develop systems / processes / reports to collect data.
62	When making decision about hiring officers PRP should consider whether the candidate has obtained post secondary education.	PRP will continue to hire all recruit constables who have post secondary education.
VII. MULTI-YEAR ACTION PLAN		
63	Create and publish a multi-year action plan that incorporates the OHRC's recommendations and includes timelines for completion. The Anti-Racism Advisory Committee should be involved in establishing this action plan. This action plan should be reviewed and approved by the Independent Reviewer and then submitted to the OHRC for final approval.	Agree
64	PRP shall explore options with the OHRC to identify alternative approaches to service delivery through the reallocation of resources to support community-based health, wellness and equity initiatives, such as mental health supports, the establishment of a crisis intervention centre, youth engagement, to	Currently, PRP's response to crisis situations ensure Uniform officers attend a mental health call and then refer to the MCRRT team. Peel, already has a primary response in place for the MCRRT program. We already have a tiered level response and are accompanied with the crisis worker.

	<p>support the safety and advancement of the Black and Indigenous communities.</p> <p>PRP should work with the cities of Mississauga, Brampton to develop a non-emergency response unit. This unit should include a component that focuses on serving the needs of Black and indigenous clients.</p>	
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GLOSSARY OF TERMS

Administrative Review: Refers to a system of more frequent performance appraisals resulting from allegations of unsatisfactory work performance of a Peel Regional Police member.

Annual Requalification: Police uniform members are required to complete and pass annual Incident Response training, which shall meet the requirements within the Ontario Policing Standards on Use of Force.

Bail Hearing, i.e. Show Cause Hearing: A court process wherein a judge or justice of the peace decides whether an accused person will remain detained or be released while awaiting their trial or resolution of their case.

Charter: Short form referring to the Canadian Charter of Rights and Freedoms.

Charter Breach: A circumstance when anyone whose rights and freedoms per the Charter have been infringed or denied.

Cleared Otherwise: A technical term used for a case status designation to close an investigation where charges have not been laid for reasons that may include; an accused or victim has taken their life, underage provisions, an accused is not present in the country, or a variety of other rare factors.

Conducted Energy Weapon (CEW): Also referred to in some circumstances as a “Taser”. The CEW is a less lethal weapon in accordance with the Provincial Use of Force Model, which, when applied, delivers a metered and pulsed electrical current. The deployment of the CEW may allow the officer to gain control of a subject.

De-escalation Techniques: Includes verbal and non-verbal communication that is designed to de-escalate a person in crisis.

Departmental Discretion: The freedom for the Peel Regional Police Service to decide what should be done in a particular situation.

Detention: An act where a police officer deprives a person of their liberty temporarily during a legal process. It can include psychological, physical, handcuffing and locking up in a holding cell.

Disposition: The status or outcome of an investigation.

Diversion Program: Community-based alternates that are voluntary programs offered to persons to resolve minor criminal offences by other means.

Drive Stun: Is a process in which a Controlled Energy Weapon (CEW) can be used as compliance from a person resisting arrest or being assaultive. This is done by activating the CEW and placing it on an individual's body.

Edged Weapon: Instruments including knives, ceremonial swords and handmade weapons.

Extrajudicial Measures: The Youth Criminal Justice Act allows for various extrajudicial measures to deal with a youth who has committed a non-violent offence. These include: taking no further action; warning the young person; administering a caution; with the consent of the young person and parent or legal guardian, and referring the youth to a program or agency in the community that may assist the youth **not** to re-offend.

Extrajudicial Sanctions: Penalties or incentives listed within the Extrajudicial Measures process.

Fit for Service: Refers to a member that is mentally, emotionally and physically able to safely and competently perform assigned duties without any limitations attributable, but **not** limited to, illness, injury, fatigue, mental stress, or the use and/or after-effects of alcohol or drugs.

Full Deployment: Refers to the use of a Conducted Energy Weapon (CEW) when a cartridge has been discharged; the probes have attached to a person and conducted energy into the person's body, delivering a metered and pulsed electrical current.

HRTTO: Human Rights Tribunal of Ontario

I.A. Pro System: Case management system used by PRP's Professional Standards to track Internal Affairs investigations

Informal Discipline: Sanctions in response to the misconduct of a Uniform member that is less serious or any misconduct of a Civilian member.

Investigative Support Bureau (ISB): Bureau responsible for the policy center for Special Investigations Unit matters to maximize efficiency and consistency of operations.

IRRC: Incident Response Review Committee comprised of Senior Managers at Peel Regional Police. Its mandate is to review Use of Force reports and incidents regularly to identify trends or other areas of concern and ensure racial bias was not a factor; Provide recommendations regarding training needs or adjustments; provide recommendations regarding changes to policies or procedures; provide recommendations regarding Use of Force equipment.

JKB: Refers to a ruling by the Human Rights Tribunal of Ontario, which found that the applicant's (JKB) race was a factor in her treatment by officers from Peel Regional Police

KPI: Key Performance Indicators

Low-level Administration of Justice Charges: Refers to minor offences of specific type violation of the law, mostly committed when pre-trial conditions or sentences from a previous conviction are disobeyed. This includes failures such as not complying with conditions of release, not appearing in court and disobeying a court order.

MCRRT: Mobile Crisis Rapid Response Teams

Memorandum of Understanding (MOU): An agreement between two or more parties outlined in a formal document.

Pre-charge Diversion: A program that allows for a (young) person who has been arrested the opportunity to accept responsibility for their actions and to agree to participate in an educational program in lieu of a criminal charge.

Racial Bias: Indulging in an inclination or prejudice, consciously or unconsciously, based on any number of personal attributes (citizenship, race, place of origin, ethnic origin, colour, ancestry, disability, age, creed, sex/ pregnancy, family status, marital status, sexual orientation, gender identity, or gender expression) that makes it difficult to judge fairly and/or has an unfair influence on decisions made during the course of the interaction

Racial Discrimination: Any distinction, conduct or action, whether intentional or not, but based on a person's race, which has the effect of imposing burdens on an individual or group, not imposed upon others or which withholds or limits access to benefits available to other members of society. Race need only be a factor for racial discrimination to have occurred.

Racial Profiling: any act or omission related to actual or claimed reasons of safety, security or public protection by an organization or individual in a position of authority, that results in greater scrutiny, lesser scrutiny or other negative treatment based on race, colour, ethnic origin, ancestry, religion, place of origin or related stereotypes; (from OHRC)

Senior Managers: A sworn uniform member of the Peel Regional Police holding the rank of Inspector or higher, or a civilian member having the position of Manager or higher.

SME: Subject Matter Expert.

Statute: A written law passed by a legislative body.

Strip Searches: Refers to the removal or rearrangement of some or all of the clothing of a person to permit a visual inspection of a person's private areas, namely genitals, buttocks, breasts (in the case of a female), or undergarments, by an officer of the same gender and or sex.

Surreptitious Conversations: Refers to recording conversations without the other party's knowledge or deliberately continuing to record when the other party believes it has ended.

Systemic Racism: Systemic racism consists of organizational culture, policies, directives, practices or procedures that exclude, displace or marginalize some racialized groups or create unfair barriers for them to access valuable benefits and opportunities. This is often the result of institutional biases in organizational culture, policies, directives, practices, and procedures that may appear neutral but have the effect of advantaging some groups and disadvantaging others.

UCR: Statistics Canada's Uniform Crime Reporting Survey.

Use of Force Report: A report mandated by Ontario Regulation 926, "Equipment and Use of Force," submitted by an officer or team of officers when force, as described within the Regulation is applied to a person(s).