

# Police Governance and Human Rights

Peel Police Service Board Commits to Advancing Human Rights and Equity in Policing Following Comprehensive Report

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2026

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## A Policy Review for the Peel Police Service Board

This document presents recommendations made by Dr. Akwasi Owusu-Bempah following an 18-month review of the Peel Police Service Board's policies. During this period, the introduction of the Community Safety and Policing Act by the Province of Ontario led to legislative changes, resulting in the repeal of previous policies, which is reflected throughout the report.

The following markers indicate the Board's response to each recommendation throughout this document:

### RECEIVED

In scope, already implemented, or in progress of being implemented

### UNDER CONSIDERATION

Evaluation underway, subject to legal, operational, budget and Community Safety and Policing Act alignment

### REMOVED

REMOVED due to internal administration or legislative amendments of the Community Safety and Policing Act

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## Overview

This report is a policy review conducted for the Peel Police Service Board (PPSB or “the Board”) and forms part of the Board’s broader, ongoing effort to strengthen its governance framework through a human rights lens. The analysis and recommendations are intended to support the Board in further operationalizing its statutory responsibilities under Ontario’s policing framework, with particular attention to accountability, transparency, and the protection of Charter and human rights.

Taken together, the recommendations reinforce the Board’s role as an active human rights governor, rather than a passive recipient of information. Across the policy suite, the analysis emphasizes that the Board’s statutory mandate is not fulfilled solely through the approval of policies or the receipt of reports. Meaningful governance requires the Board to actively set expectations, request analysis, and evaluate outcomes—especially in contexts where policing activities engage heightened legal, ethical, and human rights risks. The recommendations are therefore designed to strengthen the Board’s capacity to exercise informed, principled oversight while respecting the Chief of Police’s operational independence.

We commend the PPSB for introducing a Critical Points policy in response to Justice Morden’s 2012 recommendation, consistent with the direction set out in the review. We note that the current policy has been informed by existing frameworks in policing oversight. Furthermore, the Inspector General has previously reviewed similar policies and issued guidance intended to assist municipal police service boards considering adoption of such frameworks. The recommendations set out below are in part intended to support the Board in strengthening alignment between the current policy and the Inspector General’s guidance, which from our point of view align well with the objectives of human rights policing. More generally, the recommendations are aimed at ensuring the policy functions as an effective governance and oversight tool within the Board’s statutory mandate.

It is important to note that items currently listed as “Under Consideration” are undergoing comprehensive legal, operational, and budgetary review to ensure compliance with CSPA guidelines.

# Recommendations

## 1. PRP-AI-002 Civil Actions Management and Dispositions

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

REMOVED due to internal administration or legislative amendments of the Community Safety and Policing Act

## 2. PRP-AI-003 Workplace Violence and Harassment

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

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## 3. PRP-AI-003 Workplace Violence and Harassment

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

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## 4. PRP-AI-003 Workplace Violence and Harassment

We recommend the Board modify paragraph four of the opening statement to prioritize the ‘prevention’ of workplace harassment.

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## 5. PRP-AI-003 Workplace Violence and Harassment

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

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## 6. PRP-AI-004 Accessibility Standard for Customer Service

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

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## 7. PRP-AI-004 Accessibility Standard for Customer Service

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

RECEIVED

## 8. PRP-AI-004 Accessibility Standard for Customer Service

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

RECEIVED

## 9. PRP-AI-005 Human Rights Application Management and Dispositions

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

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## 10. PRP-AI-005 Human Rights Application Management and Dispositions

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

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## 11. PRP-AI-005 Human Rights Application Management and Dispositions

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

RECEIVED

## 12. PRP-AI-005 Human Rights Application Management and Dispositions

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

UNDER CONSIDERATION

## 13. PRP-AI-005 Human Rights Application Management and Dispositions

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

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#### 14. PRP-AI-006 Community Survey

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

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#### 15. PRP-AI-006 Community Survey

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

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#### 16. PRP-AI-006 Community Survey

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

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#### 17. PRP-AI-007 Anti-Racism and Ethnocultural Equity

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

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#### 18. PRP-AI-007 Anti-Racism and Ethnocultural Equity

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

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## 19. PRP-AI-007 Anti-Racism and Ethnocultural Equity

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

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## 20. PRP-AI-007 Anti-Racism and Ethnocultural Equity

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

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## 21. PRP-AI-007 Anti-Racism and Ethnocultural Equity

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

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## 22. PRP-AI-007 Anti-Racism and Ethnocultural Equity

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

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## 23. PRP-AI-007 Anti-Racism and Ethnocultural Equity

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

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## 24. PRP-AI-007 Anti-Racism and Ethnocultural Equity

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

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## 25. PRP-AI-008 Access to Information

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

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## 26. PRP-AI-008 Access to Information

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

RECEIVED

## 27. PRP-AI-008 Access to Information

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

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## 28. PRP-AI-008 Access to Information

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

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### 29. PRP-AI-009 Strategic Planning

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

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### 30. PRP-AI-009 Strategic Planning

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

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### 31. PRP-AI-009 Strategic Planning

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

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### 32. PRP-AI-009 Strategic Planning

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

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### 33. PRP-AI-009 Strategic Planning

The Board may consider adding the Charter of Rights and Freedoms and the Ontario Human Rights Code to the list of Legislative Authorities.

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### 34. PRP-AI-009 Strategic Planning

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

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### 35. PRP-CP-001 Community Safety Release of Info to Victims

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

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

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

UNDER CONSIDERATION

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

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

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

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

RECEIVED

### 39. PRP-CP-004 Adequate and Effective Policing

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

RECEIVED

### 40. PRP-CP-004 Adequate and Effective Policing

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

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### 41. PRP-CP-004 Adequate and Effective Policing

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

Further comments and suggestions: Section 2 of the policy deals with the Chief's preparation of an emergency plan for the Service. We advise the Board to consider our recommendation for a new policy at the end of this document dealing with "critical points" It would be advantageous for the Board to define "critical points" as outlined in the Morden Report to facilitate the Chief's development of an emergency plan. This policy could then be revised accordingly. The Board may also want to make reference for the need for appropriate training, including relevant human rights considerations, for Service members in Section 3 of the policy.

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### 42. PRP-FN-001 Procurement

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

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#### 43. PRP-FN-001 Procurement

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

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#### 44. PRP-FN-001 Procurement

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

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#### 45. PRP-FN-001 Procurement

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

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#### 46. PRP-FN-001 Procurement

We recommend the Board conduct a comprehensive review to assess current practices for sharing procurement-related information with the public. This analysis should encompass an analysis of what information is currently shared and how it is shared with the objective of identifying opportunities to improve transparency and accountability.

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#### 47. PRP-FN-001 Procurement

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

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#### 48. PRP-FN-002 Audits

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

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#### 49. PRP-FN-002 Audits

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

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#### 50. PRP-FN-002 Audits

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

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#### 51. PRP-FN-002 Audits

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

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#### 52. PRP-FN-002 Audits

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

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### 53. PRP-FN-004 External Funding Assistance – Police Investigations

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

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### 54. PRP-FN-004 External Funding Assistance – Police Investigations

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

UNDER CONSIDERATION

### 55. PRP-FN-004 External Funding Assistance – Police Investigations

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

UNDER CONSIDERATION

### 56. PRP-FN-004 External Funding Assistance – Police Investigations

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

UNDER CONSIDERATION

## 57. PRP-FN-004 External Funding Assistance – Police Investigations

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

UNDER CONSIDERATION

## 58. PRP-FN-004 External Funding Assistance – Police Investigations

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

UNDER CONSIDERATION

## 59. PRP-FN-008 Budget Policy

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

UNDER CONSIDERATION

## 60. PRP-FN-008 Budget Policy

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

UNDER CONSIDERATION

### 61. PRP-FN-008 Budget Policy

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

UNDER CONSIDERATION

### 62. PRP-FN-008 Budget Policy

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

UNDER CONSIDERATION

### 63. PRP-HR-001 Long-Term Disability

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

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### 64. PRP-HR-001 Long-Term Disability

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

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### 65. PRP-HR-003 Grievance Settlements

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

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## 66. PRP-HR-003 Grievance Settlements

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

UNDER CONSIDERATION

## 67. PRP-LG-003 Delegated Authority

Under section 2.1, the Board delegates approval and signing authority to the Chief on all activities listed in section 2.1a through 2.1r. Under section 2.1j, the Board delegates approval and signing authority for all “contracts and agreements of an operational nature in accordance with the Board’s purchasing Policy No. PRP-FN001. Section 2.1k delegates authority for all “operational protocols between the Board and other agencies covering such areas as the sharing of information, the sharing of resources, and the conduct of police and other investigations”. We recommend the Board review this section of the policy to determine whether or not it is granting too much authority to the Chief on these matters. In conducting this review, we recommend the Board consider the new language about “operations” in the CSPA.

UNDER CONSIDERATION

## 68. PRP-LG-003 Delegated Authority

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

UNDER CONSIDERATION

## 69. PRP-LG-004 Complaints of Misconduct

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

UNDER CONSIDERATION

## 70. PRP-LG-004 Complaints of Misconduct

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

RECEIVED

## 71. PRP-LG-004 Complaints of Misconduct

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

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

RECEIVED

## 72. PRP-LG-007 Misconduct and Discipline

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

RECEIVED

## 73. PRP OP 003 Collection Of Identifying Information in Certain Circumstances - Prohibition and Duties

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

RECEIVED

## 74. PRP OP 003 Collection Of Identifying Information in Certain Circumstances - Prohibition and Duties

We recommend the Board add a definition of "Identifying Information" to the policy

RECEIVED

## 75. PRP OP 003 Collection Of Identifying Information in Certain Circumstances - Prohibition and Duties

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

RECEIVED

## **76. PRP OP 003 Collection Of Identifying Information in Certain Circumstances - Prohibition and Duties**

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

RECEIVED

## **77. PRP OP 003 Collection Of Identifying Information in Certain Circumstances - Prohibition and Duties**

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

RECEIVED

## **78. PRP OP 003 Collection Of Identifying Information in Certain Circumstances - Prohibition and Duties**

Sections 15- 18 deal with findings of “disproportionate reporting”. In the event that disproportionate collection is found based on sex, age, racialized group, or a combination, a direct statement is required in the Service’s annual report, a review of practices is required, and the Chief is required to “prepare a report to the Board setting out the results of the review and his or her proposals, if any, to address the disproportionate attempted collection of information”. We advise the Board to also consider how it might use findings of disproportionate reporting in Chief performance review and compensation related decisions.

RECEIVED

## **79. PRP OP 003 Collection Of Identifying Information in Certain Circumstances - Prohibition and Duties**

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

RECEIVED

## 80. PRP-OP-005 Body Worn Cameras

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

RECEIVED

## 81. PRP-OP-005 Body Worn Cameras

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

RECEIVED

## 82. PRP-OP-005 Body Worn Cameras

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

RECEIVED

## 83. PRP-OP-005 Body Worn Cameras

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

RECEIVED

## 84. PRP-OP-005 Body Worn Cameras

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

RECEIVED

## 85. PRP-OP-005 Body Worn Cameras

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

RECEIVED

## 86. PRP-OP-006 Special Investigation Reporting

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

RECEIVED

## 87. PRP-OP-006 Special Investigation Reporting

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

RECEIVED

## 88. PSB-AI-001 Board Procedures

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

RECEIVED

## 89. PSB-FN-002 Community Support and Recognition Fund

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

UNDER CONSIDERATION

## 90. PSB-FN-002 Community Support and Recognition Fund

Section 3 lists four funding priorities for the Community Support and Recognition Fund. We recommend the Board add human rights initiatives as a 5th funding priority.

REMOVED due to internal administration or legislative amendments of the Community Safety and Policing Act

## 91. PSB-LG-001 Operation Service Agreements

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

REMOVED due to internal administration or legislative amendments of the Community Safety and Policing Act

## 92. ER-011 Extreme Incident Response

Consider aligning the Extreme Incident Response Plan with the Board's Critical Points policy to strengthen early governance awareness and oversight: The Board should consider whether an explicit linkage can be made between the Extreme Incident Response Plan (ER-011) and the Board's Critical Points policy to improve coherence across the governance framework.

Clarify the Board's role in setting transparency and public confidence expectations during extreme incidents (Section 10): The Board should consider amending ER-011 to more clearly acknowledge its governance role in establishing expectations around transparency, public confidence, and post-incident disclosure during extreme incidents, while preserving the Chief's operational authority over real-time communications. Section 10 could be clarified to recognize that, although decisions about what information is released during an incident appropriately rest with the Chief, those decisions are guided by Board-approved principles and expectations.

UNDER CONSIDERATION

### 93. ER-012 ACTIVE ATTACKER INCIDENTS

Explicitly acknowledge trauma and the importance of trauma-informed policing in the Policy Statement: The Board should consider amending the Policy Statement of ER-012 to explicitly acknowledge that active attacker incidents are inherently traumatic events for victims, witnesses, affected communities, and responding members. While the policy appropriately emphasizes rapid response and life preservation, an explicit reference to trauma / trauma-informed policing would better reflect contemporary best practices in policing and signal that the Service's response is expected to balance operational urgency with sensitivity to psychological harm.

Highlight the importance of trauma-informed policing in interactions with victims and witnesses: The Board should consider strengthening the policy by explicitly emphasizing the importance of trauma-informed policing in interactions with surviving victims, witnesses, and affected family members following an active attacker incident. While the policy appropriately requires the provision of assistance and referrals, it does not explicitly recognize that initial and subsequent police interactions may significantly affect recovery, cooperation, and trust.

Clarify how the public is to be made "aware" of non-urgent communication channels under Section 8: The Board should consider clarifying Section 8 to specify how the public will be made aware of the means for accessing non-urgent information during an active attacker incident. As currently drafted, the requirement to "ensure that the public is made aware" is open-ended and risks reliance on limited or inequitable communication channels. Awareness should be achieved through multiple, accessible communication methods (e.g., website updates, traditional media, community alerts, and other appropriate platforms).

RECIEVED

### 94. PSB-AI-002 Code of Conduct for Board Members

Clarify the relationship between "good faith performance" and accountability: Several provisions appropriately shield Board members from discipline where conduct occurs in the good faith performance of their duties. However, the policy does not clarify how good faith is assessed or how it interacts with the Board's accountability obligations. The Board should clarify that good faith does not excuse conduct that undermines human rights, procedural fairness, or statutory compliance. This clarification would preserve space for robust debate while preventing over-reliance on the good-faith exception in circumstances that warrant scrutiny.

Introduce a periodic review and training requirement for the Code of Conduct: The Code of Conduct does not require periodic review or ongoing training for Board members. Given legislative change, evolving human rights standards, and turnover in Board composition, the Board may wish to require regular review of the Code of Conduct and mandatory orientation and refresher training for Board members.

Introduce a concise guiding principles section: The Board may wish to add a short section to PSB-AI-002 setting out key governance principles that Board members are expected to uphold and demonstrate in the exercise of their duties, such as respect for human rights and human dignity, procedural fairness, integrity and accountability, and impartiality and independence.

UNDER CONSIDERATION

## 95. PRP-AI-010 Quality Assurance

Revise the policy statement for clarity, accessibility, and alignment with the Board’s statutory mandate: The Board should consider revising the policy statement in PRP-AI-010 to improve clarity, accessibility, and precision of language. The opening sentence is conceptually dense and difficult to parse, and the cumulative use of emphatic adjectives such as “steadfast,” “unwavering,” and “meticulous” adds rhetorical weight without improving substantive meaning. Simplifying the language would make the policy more accessible to the public and to non-specialist audiences.

Explicitly link quality assurance to the Board’s duty to ensure adequate and effective policing: The Board should consider amending the policy statement to explicitly reference its statutory responsibility to ensure the provision of adequate and effective policing. While the policy emphasizes accountability, risk mitigation, and operational objectives, it does not clearly connect quality assurance and audit functions to the Board’s core legal mandate under the Community Safety and Policing Act.

Require disclosure to the Board of audit scope, methodology, and limitations: The Board should consider amending section 1 of the Policy Application section to add a new subsection requiring that the Board be explicitly apprised of the scope, methodology, and limitations of audits and quality assurance reviews presented to it. While the policy appropriately requires audit plans and consolidated reporting, it does not require disclosure of constraints that may materially affect how audit findings should be interpreted. Without understanding what was excluded, constrained, or not examined, the Board’s ability to meaningfully evaluate audit results and draw governance conclusions is limited.

See also previous recommendations provided in relation to PRP-FN-002 Audits, in original policy review report.

UNDER CONSIDERATION

## 96. PRP-LG-008 Internal Complaints Against the Chief of Police or Deputy Chief of Police

Explicitly affirm human rights, procedural fairness, and the right to complain in the Policy Statement: The Board should consider amending the Policy Statement of PRP-LG-008 to explicitly anchor the internal complaints process in principles of human rights, procedural fairness, and non-discrimination, and to affirm that members and former members have a clear right to raise concerns about the conduct of the Chief or Deputy Chief. Further, the Board should consider acknowledging in the statement that complaints are a legitimate and important accountability mechanism that supports the Board in fulfilling its statutory governance and oversight responsibilities, including the monitoring and evaluation of the Chief's performance.

Clarify the Board's governance role following receipt of a complaint: The Board should consider amending the policy to more clearly articulate the actions it may take, at a governance level, after a complaint is received. In addition to consulting legal counsel, the policy could specify that the Board may determine whether referral to the Inspector General or another statutory body is required, monitor the handling of the complaint to ensure procedural fairness and timeliness, and assess whether the matter raises broader governance, policy, or systemic issues warranting Board review.

Provide an optional standardized complaint form to support accessibility, consistency, and oversight: The Board should consider developing an optional standardized complaint form for use by members and former members who wish to submit disclosures under PRP-LG-008, while clearly affirming in the policy that complaints may be submitted in any written format and that use of the form is not mandatory. The availability of a standardized form would promote accessibility and procedural fairness by helping complainants understand the information typically required.

Strengthen and operationalize public reporting commitments: The Board should consider clarifying Section 8 by defining, at a high level, what constitutes "material information" for public reporting purposes and how such information will be communicated. Subject to confidentiality and fairness considerations, the policy should commit the Board to reporting in aggregate or anonymized form on the use of the policy, such as the number of complaints received, the general nature of issues raised, and high-level outcomes or status updates where appropriate.

Add an explicit non-interference and non-influence safeguard: The Board should consider adding a provision explicitly prohibiting any attempt by Board members, Service leadership, or any other person to interfere with, influence, or obstruct the complaint process (in addition to addressing reprisals, which the policy already does).

UNDER CONSIDERATION

## 97. LE-048 Conduct of Investigations

Explicitly frame investigative excellence as a human rights obligation, not solely a performance objective: The Board should amend the policy statement to clarify that high-quality investigations are not only a matter of organizational excellence or public confidence, but a core human rights obligation. While the current statement acknowledges that wrongful accusations erode trust, it does not explicitly recognize that deficient investigations can infringe Charter rights, including the right to liberty, security of the person, and procedural fairness.

Clarify the Board's role in resourcing decisions that affect investigative quality: The Board should amend the policy to explicitly recognize that investigative quality is affected by resourcing decisions that fall within the Board's governance authority. While the policy lists factors used to determine investigative staffing levels, it does not link these considerations to the Board's responsibility for ensuring adequate and effective policing. Clarifying that the Board will use information on workload, clearance rates, crime severity, and geographic complexity to inform budgetary and strategic decisions would strengthen coherence between investigative oversight, resourcing, and accountability.

RECEIVED

## 98. LE-049 Disclosure of Personal Information

Require explicit consideration of potential discriminatory or disproportionate impacts of disclosure: The Board should consider amending LE-049 to require that disclosure decisions explicitly weigh whether releasing personal information may have disproportionate or discriminatory impacts on individuals or communities protected under the Ontario Human Rights Code. Disclosure—particularly in cases involving perceived risk, mental health, or pre-conviction status—can reinforce stigma and exacerbate harm to marginalized groups.

Require periodic summary reporting on disclosure practices and trends: The Board should consider amending LE-049 to require periodic (e.g., annual) summary reporting on the use of disclosure authorities, including the frequency of disclosures, the purposes relied upon, and any observed trends or systemic issues. Aggregated trend information would allow the Board to assess whether disclosure practices remain proportionate, lawful, and consistent with public expectations over time.

Clarify safeguards against disclosure based on incomplete or evolving information: The Board should consider amending the policy to explicitly acknowledge the risks associated with disclosure decisions made based on incomplete, evolving, or preliminary information, particularly where individuals have not been convicted.

UNDER CONSIDERATION

## 99. LE-50 Vehicle Pursuits

Aggregate reporting on vehicle pursuits: The Board should consider formally discussing and/or periodically reviewing the vehicle pursuit reporting requirements set out in this policy and determine whether the current list of aggregate statistics provided by the Chief is sufficient to support the Board's governance and oversight role. As currently structured, the reporting framework does not include certain key contextual information that may be relevant to the Board's assessment of risk, proportionality, and policy effectiveness, such as whether force was used during a pursuit, the primary reason for pursuit initiation, or the general category of alleged offence.

RECEIVED

## 100. PRP-HR-002 Secondary Activities

No comments or recommendations at this time.

N/A

## 101. AI-012-Use of Force and Weapons

Explicitly anchor the use of force framework in Charter and human rights obligations: The Board should consider amending AI-012 to include an explicit statement affirming that police use of force constitutes a moment of heightened engagement with legally protected rights, and that Board oversight of use of force flows directly from its statutory duty to ensure adequate and effective policing. While the policy appropriately references necessity, proportionality, and reasonableness, it does not clearly situate these principles within the Canadian Charter of Rights and Freedoms or the Ontario Human Rights Code. An explicit statement clarifying that the purpose of Board-level governance of use of force includes safeguarding life, preventing discriminatory or disproportionate impacts on protected groups, and maintaining public confidence would strengthen the policy's coherence with the Board's legal mandate and reinforce that human rights considerations are central.

Require demonstrated competence for all authorized force options, not only firearms: The Board should consider amending AI-012 to ensure that competence requirements apply consistently across all authorized force options. Currently, the policy explicitly requires demonstrated competence prior to the issuance of a firearm, while other force types are subject only to compliance with prescribed training requirements.

Shift Board oversight of de-escalation from training inputs to outcome-based evaluation: The Board should consider amending AI-012 to require that oversight of de-escalation extend beyond reporting on training delivery to include evaluation of de-escalation outcomes. While the policy emphasizes the importance of de-escalation and requires reporting on the provision of related training, it does not enable the Board to assess whether these initiatives are reducing the frequency, severity, or escalation of use of force incidents in practice. The annual use of force report should therefore include analysis of trends in force usage following de-escalation training initiatives, information on the circumstances in which de-escalation was attempted and whether it was effective, and a narrative assessment from the Chief identifying systemic or organizational barriers to successful de-escalation.

Require contextualized and analytical use of force reporting rather than decontextualized statistics: The Board should consider amending AI-012 to require that use of force data be presented with appropriate context, explanation, and analysis, rather than as stand-alone statistics. Although the policy mandates reporting on a wide range of variables—such as time of day, unit assignment, years of service, and perceived race—it does not specify how these data should be interpreted or used to identify patterns, risks, or systemic issues. The policy should require multi-year trend analysis, contextual explanations of observed patterns, analysis of racial disproportionality relative to population and policing context, and identification of persistent or emerging issues that may warrant policy review or additional oversight. The Board should avoid leaving too much to reliance on discretionary language allowing the Chief to provide “any other relevant information” and instead explicitly require categories of information that are known to exist and are demonstrably useful for governance and oversight.

RECEIVED

## 102. PSB-AI-007 - Critical Points

Explicitly anchor the Critical Points framework in human rights and equity obligations: The Board should consider amending PSB-AI-007 to include an explicit statement linking the identification and management of Critical Points to the Board's statutory and human rights obligations. While the policy appropriately emphasizes enterprise, reputational, and operational risk, it does not clearly articulate that Critical Points frequently arise at moments of heightened Charter and human rights engagement.

Differentiate between emerging and confirmed Critical Points to enable proportionate early governance engagement: The Board should consider revising PSB-AI-007 to clearly distinguish between emerging and confirmed Critical Points. Emerging Critical Points may involve incomplete or evolving information but nonetheless signal elevated organizational, legal, or human rights risk warranting early Board awareness. Confirmed Critical Points would meet a defined threshold requiring sustained Board oversight and potential governance action. This distinction would support the Inspector General's emphasis on early information exchange, allow the Board to prepare for potential policy, financial, or reputational implications, and reduce ambiguity about when reporting obligations are triggered.

- Standardize Critical Point briefings and require inclusion of operational plans and service continuity considerations: The Board should consider requiring that information provided by the Chief in relation to a Critical Point follow a standardized briefing format. In addition to the categories already listed, the standardized format could explicitly include:
  - a. a high-level outline of the operational plan (without tactical detail), and
  - b. continuity of service considerations, including how core policing functions will be maintained.

This refinement would strengthen the Board's ability to assess organizational readiness, resourcing adequacy, and policy sufficiency in a consistent and systematic manner.

- Require explicit identification of human rights and equity risks: The Board should consider amending PSB-AI-007 to require that Critical Point briefings explicitly identify any known or reasonably foreseeable Charter or human rights risks, including potential disproportionate impacts on marginalized or protected groups. Although the policy references impacts on marginalized and vulnerable communities as an example of a Critical Point, it does not require systematic analysis of rights implications once a Critical Point is identified. Embedding this requirement would operationalize the Board's human rights oversight role and align with the Inspector General's emphasis on informed governance decision-making.
- Clarify the scope of permissible Board action and formalize reciprocal information exchange: The Board should consider amending PSB-AI-007 to more clearly articulate both the limits and the affirmative tools of Board action during a Critical Point. In addition to reaffirming the prohibition on directing specific operations or investigations, the policy could explicitly state that the Board may:
  - set governance-level objectives and priorities;
  - request additional information;
  - consider policy amendments or resource implications;
  - identify questions or concerns requiring Chief response; and
  - plan for post-event governance review.

To reflect the Inspector General's emphasis on reciprocal information exchange, the policy could also require that, once briefed, the Board communicate any governance objectives or priorities to the Chief, and that the Chief provide advice on operational feasibility or implications of potential policy directions.

- Rebalance authority to designate Critical Points and require Chief response where Board objectives are not met: The Board should consider amending PSB-AI-007 to clarify that, while the Chief plays a primary role in identifying and reporting Critical Points arising from operations, the Board retains final authority to designate a matter as a Critical Point for governance and oversight purposes. This amendment would not diminish the Chief’s operational independence but would instead ensure that the Board is not dependent on a single gatekeeping determination to exercise its lawful oversight and risk management functions.

In addition, consistent with the Inspector General’s recommended language, the policy should consider requiring that where the Board concludes its governance objectives are not being achieved during a Critical Point, the Chief ought to respond by either:

- a. identifying corrective measures, or
- b. explaining the operational necessity for deviating from Board objectives.

This amendment would strengthen accountability and information flow while preserving the Chief’s autonomy over operational execution.

- Formalize a post-Critical Point governance review and accountability loop: The Board should consider amending the policy to require a structured post-Critical Point governance review once the event has concluded, subject to timing flexibility where investigations or proceedings are ongoing. This review could focus on governance-level lessons learned, including whether policy gaps were identified, whether anticipated risks materialized, and whether systemic, legal, or human rights concerns emerged. The policy could further clarify that insights from such reviews may inform future policy amendments, strategic priorities, and—where relevant—the Chief’s performance evaluation.
- Introduce a public transparency commitment regarding Critical Points: The Board should consider amending PSB-AI-007 to include a commitment to public transparency regarding Critical Points, subject to legal and confidentiality constraints. While confidentiality is essential during sensitive events, the policy currently lacks any articulation of how the Board will communicate its governance role to the public once risks have stabilized.

#### UNDER CONSIDERATION

### 103. PSB-AI-008 - Temporary Leave of Sitting Board Members Seeking Higher Political Office

No comments or recommendations at this time.

N/A

#### 104. BY-LAW NO. 01-24 – CSRF

Broaden and anchor line about “addressing systemic issues” in Fund Priority 3 to the Board’s human rights and equity obligations: The Board should consider amending Section 3 of the Fund Priorities in By-law No. 01-24. While the current language appropriately identifies anti-Black and anti-Indigenous racism as critical priorities, framing “addressing systemic issues” in a more comprehensive and inclusive manner would better reflect the Board’s obligations under the Community Safety and Policing Act, the Ontario Human Rights Code, and the Canadian Charter of Rights and Freedoms, and avoid the perception of an implicit hierarchy among protected grounds.

Proposed revision: “addressing systemic human rights issues, including, but not limited to, racism, sexism, and other forms of discrimination recognized under the *Ontario Human Rights Code and the Canadian Charter of Rights and Freedoms.*”

RECEIVED

#### 105. BY-LAW NO. 02-24 - Grievance Settlements

Acknowledge the governance significance of grievances engaging human rights issues: The Board should consider amending By-law No. 02-24 to acknowledge that grievances involving alleged discrimination, harassment, accommodation, or reprisal may raise human rights considerations of relevance to the Board’s governance and oversight role.

Clarify the purpose and scope of grievance trend reporting:

The Board should consider amending By-law No. 02-24 to clarify that reporting on observable trends or patterns in grievance activity is intended to identify recurring or emerging issues of potential governance significance, including those related to organizational practices, workplace culture, or compliance with human rights obligations.

Consider removing the qualifier “if any” from grievance trend reporting: The Board should consider amending By-law No. 02-24 to remove the phrase “if any” from the requirement to report on observable trends in grievance activity. Removing this qualifier would reinforce the expectation that some level of assessment and reporting will occur each year and that the absence of identified trends should be an explicit, informed conclusion rather than a default assumption, even where the Board and the Service agree that no significant trends are present.

UNDER CONSIDERATION

### 106. BY-LAW NO. 03-24 -Governance & Human Rights Committee

Expand the Committee’s mandate to strengthen meaningful public disclosure and the Board’s role as a conduit of information to the community: The Board should consider amending the by-law establishing the Governance and Human Rights Committee to explicitly assign responsibility for improving meaningful public disclosure mechanisms and strengthening the Board’s role as a conduit of information between the police service and the community. While the Committee’s mandate appropriately emphasizes trust, accountability, and engagement, it does not expressly task the Committee with examining how information is shared with the public, whether disclosures are timely, accessible, and contextualized, or whether Board communications meaningfully support public understanding of policing and oversight.

Expand legislative monitoring to include oversight of the Board’s full use of its statutory and policy powers: The Board should consider amending section 10 of the Committee’s mandate to clarify that legislative monitoring includes ongoing assessment of whether the Board is fully and effectively exercising the powers available to it under legislation and Board policy. While section 10 appropriately tasks the Committee with monitoring legislative developments and supporting human rights training, it does not address the risk of underutilization of existing governance and oversight powers to secure, uphold, and reaffirm human rights.

UNDER CONSIDERATION

### 107. BY-LAW NO. 04-24 -Delegated Authority

No comments or recommendations at this time.

N/A

### 108. BY-LAW NO. 05-24 - Human Resources Committee

No comments or recommendations at this time.

N/A

### 109. BY-LAW NO. 06-24 - Finance Committee

No comments or recommendations at this time.

N/A

## 110. PRP-FN-005 External-Funding-Assistance-Public-Police-Programs

Explicitly acknowledge risks to public trust and perceived police impartiality arising from external funding assistance: The Board should consider amending the policy statement in PRP-FN-005 to explicitly acknowledge that accepting external funding assistance, including financial contributions, goods, and services-in-kind, can pose risks to public trust and perceptions of police impartiality, particularly where funding originates from private or non-governmental sources.

Clarify the full range of potential sources of external funding assistance: The Board should consider amending the "Subject" and "Definitions" sections of PRP-FN-005 to more clearly and consistently describe the full range of possible sources of external funding assistance. The current reference to "external agencies, including government bodies," alongside a definition of External Funding Assistance as "private funding," may be misleading and create ambiguity regarding whether funding may originate from businesses, community organizations, or private individuals.

Define "core policing functions" to support consistent application of the public-funding principle: The Board should consider amending the Definitions section of PRP-FN-005 to include a clear definition of "core policing functions," as referenced in section 3(c). While the policy affirms the principle that core policing functions must be publicly funded, the absence of a definition creates uncertainty regarding what activities are included or excluded. Providing a definition, or at minimum illustrative examples, would enhance clarity, support consistent decision-making, and reduce the risk that external funding could inadvertently encroach on functions that should remain publicly funded.

Reconsider the external funding reporting threshold considering perception and legitimacy risks: The Board should consider reviewing whether the current reporting threshold of \$25,000 for mandatory inclusion in the annual external funding assistance report remains appropriate given the potentially sensitive nature of external funding. Even lower-value contributions may create real or perceived risks to impartiality or public confidence, particularly where funding is targeted, recurring, or associated with private entities. The Board should consider whether a lower threshold, or supplemental qualitative reporting criteria, would better support transparency and proactive oversight.

Specify minimum reporting content for external funding assistance disclosures: The Board should consider amending the reporting provisions of PRP-FN-005 to explicitly require that reports on external funding assistance include, at minimum, the identity of the funding source, the total value of the assistance, the form of the assistance (financial, goods, or services-in-kind), and how it was used by the Service. While the policy requires "detailed information," it does not specify content, leaving reporting practices potentially inconsistent over time.

Require periodic benchmarking against best practices in other jurisdictions: The Board should consider amending PRP-FN-005 to require periodic review of external funding assistance policies and practices in comparable jurisdictions to ensure alignment with evolving best practices. Given the ongoing public sensitivity around police funding, partnerships, and independence, a structured review of approaches used by other police services and boards, particularly those with established public registries or enhanced disclosure frameworks, would support continuous improvement and demonstrate the Board's commitment to principled, rights-respecting governance.

UNDER CONSIDERATION

### 111. PRP-FN-006 Found Money

No comments or recommendations at this time.

N/A

### 112. PRP-FN-007 Financial Management

No comments or recommendations at this time.

N/A

### 113. PRP-LG-005 Legal Indemnification Non-Association Members

No comments or recommendations at this time.

N/A

### 114. PRP-LG-006 Legal Indemnification Claims

No comments or recommendations at this time.

N/A

### 115. PRP-OP-001 Community Events Paid Duty

Strengthen and standardize human rights language: Section 1.c currently contains a provision that appears verbatim in multiple Board policies, stating that the Board “ensures that members act with full respect for human dignity and according to professional standards of skill, integrity, and accountability.” While this language reflects important governance values, it does not explicitly reference human rights, despite the Board’s statutory obligations in this area. The Board should consider revising this provision to explicitly affirm respect for human rights and apply the updated wording consistently across all policies in which it appears. Proposed revision: “Ensures that members act with full respect for human dignity and all other human rights, and in accordance with professional standards of skill, integrity, and accountability.”

UNDER CONSIDERATION

### 116. PRP-OP-002 Alarms

No comments or recommendations at this time.

N/A

## 117. PRP AI 001 Board Procedures Policy

Align the Board Member conduct standard with the protected grounds under the Ontario Human Rights Code: The Board should consider amending section 15.2(d) of PSB-AI-001 to explicitly reference the “protected grounds” set out in the Ontario Human Rights Code.

Clarify the human rights rationale for in-camera decision-making and reporting back to the public: The Board should consider amending the sections governing closed meetings to more clearly articulate the rationale for balancing confidentiality with transparency. While the policy appropriately lists statutory grounds for in-camera sessions, it does not explain how the Board ensures that confidentiality is used narrowly and that public reporting occurs wherever possible.

Require periodic review of Board procedures to ensure continued alignment with best practices and evolving governance expectations: The Board should consider amending PSB-AI-001 to require a scheduled, periodic review of its procedures, including consideration of evolving best practices in police governance, transparency, accessibility, and human rights oversight. While the policy is detailed and robust, it does not require the Board to revisit whether its procedural rules remain fit for purpose over time.

UNDER CONSIDERATION

## New policies for consideration

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

UNDER CONSIDERATION

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

UNDER CONSIDERATION

We recommend the Board create a policy that defines “critical points”, consistent with John Morden’s recommendation for police boards in 2012 following the G20 Summit

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## Appendix A: Inspector General of Policing

Link to Inspector General of Policing Memorandum and Advisory Bulletin on Critical Points Policy:

<https://assets.ioontario.ca/statics/public/2025-04/inspector-general-memorandum-3-igm3-critical-points-policy-final-combined.pdf?VersionId=p1a9HGsx9M7YMH3CHI3P14cxlG4VDSxl>

## Appendix B: Methodology

Dimension	Guiding Questions
Statement of Commitment	<p>Does the policy clearly and unequivocally state the Boards commitment to uphold human rights, respect diversity, and ensure the fair and just treatment of all individuals within the community?</p>
Conformity with relevant laws and policies	<p>Does the policy conform with relevant Canadian human rights legislation or standards explicitly referenced in the policy?</p> <p>Are human rights-related statements, definitions, and provisions in conformity with the Ontario Human Rights Code and other relevant Canadian human rights legislation or standards?</p> <p>Is the policy consistent with the seven key principles of the OHRC’s Policy on Eliminating Racial Profiling in Law Enforcement: acknowledgement, engagement, policy guidance, data collection, monitoring and accountability, organizational change, and multi-year action plan?</p>
Non-discrimination and Equal Treatment	<p>Does the policy outline specific measures to prevent discrimination based on race, ethnicity, religion, gender, sexual orientation, socioeconomic status, or any other protected characteristics?</p>

Dimension	Guiding Questions
Transparency	<p>Does the policy provide clear and accessible information to the public about the Board’s decision-making processes, activities, and outcomes?</p> <p>Is there a commitment with the policy to regularly update and communicate relevant information to the community in a timely manner?</p>
Accountability	<p>Does the policy articulate a clear and transparent process for reporting and addressing any deviations from established standards, ensuring accountability both for the Board’s actions and decisions as well as the Chief of Police’s individual performance and adherence to the set standards?</p>
Measurement and Evaluation	<p>Does the policy have clear mechanisms for measuring and evaluating relevant service activities that are detailed in the policy?</p> <p>Are the policy’s existing approaches to measurement and evaluation consistent with the goals of human rights-centered policing?</p>

Dimension	Guiding Questions
<p>Training and Education</p>	<p>Does the policy explicitly reference human rights-related training and education?</p> <p>Are the policy’s existing human rights-related training and education provisions mandatory, ongoing, up-to-date, and sufficient in scope?</p>
<p>Community Engagement</p>	<p>Does the policy encourage meaningful community engagement and input in shaping Board priorities and governance/oversight functions?</p>
<p>Strategy</p>	<p>Does the policy connect relevant provisions to a broader overarching strategy and/or diversity plan?</p>

Dimension	Guiding Questions
Definitions	<p>Are human rights-related keywords and phrases in the existing policy clearly defined?</p> <p>Does the policy need the definitions of human rights-related keywords and phrases updated or added?</p>
Language and Accessibility	<p>Is the policy clearly written using easy-to-understand, accessible language consistent with current discourses on human rights?</p>
Unintended Consequences	<p>Does the existing policy risk unfairly benefiting or otherwise impacting certain groups or segments of the community over others?</p> <p>Will the proposed revisions to the policy help mitigate concerns about unintended consequences?</p>