



Ontario
Human Rights Commission
Commission ontarienne des
droits de la personne



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

RECOMMENDATIONS

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

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

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

Note: OHRC, PRP and PPSB will continue to work on recommendations flowing from the Human Rights Project.

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

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

#	Detailed Recommendation
1	Publicly acknowledge the reality of racial discrimination in PRP service-delivery, the impact on trust, and the specific impact on Black, Indigenous and racialized communities. PRP should apologize for racially discriminatory service delivery and commit to ending systemic racism within PRP.
1a	Engage with Peel's diverse communities on the form and content for the acknowledgment in 1.
2	The acknowledgement or apology should reflect the following: • The unique experiences of each racialized community and the intersectional identities that exist within those communities. • Data from use of force reports. • Individual incidents involving the police may reflect systemic issues that need to be addressed by the service. • Police are not always the best institution to respond to calls that do not involve an emergency or criminal conduct. • Racialized communities experience intergenerational harm tied to the origins of policing.
3	Create an Anti-Racism Advisory Committee composed of anti-racism experts and people with lived experiences who reflect diverse viewpoints on the role of police (Carby Inquest). This advisory group would consult with Peel's diverse Black, Indigenous and racialized communities and provide ongoing advice on the content of these recommendations and how best to meaningfully implement these recommendations.
4	Engage Peel's diverse communities on a broad array of issues related to ending systemic racism in policing, including community calls for alternate approaches to police services, and identifying opportunities to enhance efficiency, and sustainability in service delivery and the possible redirection of non-core policing functions.
5	In consultation with Black communities, PRP and PPSB should consider whether this action plan should form part of the strategic plan for the provision of policing, required by s.39(1) of the <i>Community Safety and Policing Act</i> when it comes into force.
6	PRP and the PPSB should work with community groups to identify the desired outcomes from the engagement process and track the extent to which those outcomes have been fulfilled by conducting pre-and post-engagement surveys or adopting other relevant measures.
7	PPSB should amend its existing policy to incorporate a community renewal fund dedicated to advancing community safety and well-being initiatives for Black, Indigenous, and racialized communities.
8	PRP, in collaboration with ARAC and OHRC, should develop a community experiences portal where community members can share their views, thoughts and experiences with PRP.
9 a	PRP should collect and release survey data on community perspectives on policing.
9 b	PRP should collect and release data on the number of officers under disciplinary review.

#	Detailed Recommendation
10	PRP should commit to working with community service providers that may assist members of the public that have suffered vicarious trauma stemming from interactions with police which have been reviewed by a complaints or oversight body, or internal review.
	Policy on Eliminating Racial Discrimination
11	PRP should conduct a policy review and update their policies as per an established timetable, including PRP's Directive on Racial Profiling / Bias-Based Policing, I-B-158 (F), and procedures, training, and accountability mechanisms to ensure they reflect the principles and best practices in the OHRC's Policy on eliminating racial profiling in law enforcement.
12	These updates should include:
12a	Referencing the OHRC's Policy on eliminating racial profiling in law enforcement in Section A;
12b	Replacing the Directive's definition of racial profiling in Section C with the OHRC's definition of racial profiling as "any act or omission related to actual or claimed reasons of safety, security or public protection by an organization or individual in a position of authority, that results in greater scrutiny, lesser scrutiny or other negative treatment based on race, colour, ethnic origin, ancestry, religion, place of origin or related stereotypes";
12c	Qualifying the guidance provided in Section D of the Directive by stating, "In human rights and criminal law, it is a recognized principle that racial profiling can occur even where race is one factor among other legitimate factors used to single someone out. Therefore, extraordinary caution must be taken when using criminal profiles that include race or related grounds, even if these are coupled with other objective factors;"
12d	Incorporating the concept of under-policing as a component of racial profiling, by adding a statement to Section F of the Directive which confirms that, "No member of the PRP shall, in the course of an investigation, devote a lesser amount of time to an investigation because of race, colour, apparent ethnicity, ancestry, religion or place of origin;"
12e	Identification of the potential role of racial profiling or bias in incident response and use of force decisions;
12f	The requirement that supervisors must proactively monitor and address allegations of anti-Black racism, anti-Indigenous racism, racial profiling or other forms of biased-based policing;
12g	The requirement that allegations of biased policing, including racial profiling, are entered and tracked in any disciplinary tracking system (e.g. I.A. Pro);
12h	Clear identification of intentional, unconscious, and systemic sources of racial profiling, including artificial intelligence sources of racial profiling;
12i	The requirement that officers use de-escalation techniques and tactics, whenever possible, to minimize the need to use force and increase the likelihood of voluntary compliance with legitimate and lawful orders;
12j	The requirement that officers take reasonable steps to intervene in a manner that is proportional to the risk of harm if the act continues, with the goal of de-escalating the situation, and report the incident;

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12k	A prohibition on street checks and carding, which can be defined as officers requesting identifying information from members of the public with insufficient grounds for doing so. Note that this definition is broader than Ontario Regulation 58/16, <i>Collection of Identifying Information in Certain Circumstances - Prohibition and Duties</i> ;
12l	A prohibition on performance management measures – pertaining to periodic counts of tickets, charges, arrests, stop and question activities, etc. – that may incentivize racial profiling and racial discrimination;
12m	With respect to concerns regarding traffic stops, we recommend Peel Regional Police should: (a) Collect and publicly disclose disaggregated data on all traffic stops- that includes race, Indigenous ancestry, age, and gender of the driver and witnesses (if any present with subject); b) Any policy, directive, or training, which sanction vehicle stops should not undermine human rights considerations. Accordingly, protected grounds under the <i>Human Rights Code</i> , including race, should not be a factor when an officer decides to stop a vehicle.
12n	The requirement that officers approach all interactions with Black, Indigenous and other racialized persons, including youth and adults, in a manner that takes into account histories of being over-policed, and use alternatives to charges and arrests, where appropriate. This includes and builds upon the requirement from the <i>Youth Criminal Justice Act</i> (YCJA) that police officers consider the use of extrajudicial measures, such as informal warnings, police cautions, or referrals to community resources, before deciding to charge a young person;
12o	The Youth Crimes Investigation Directive should be amended as follows:
12o i	The Youth Crimes Investigation Directive should be amended to exclude children under 12 from the sections of the directive that apply to “young persons” or young offenders aged 12 and older who can be charged under the YCJA.
12o ii	Section H of the Youth Crimes Investigation Directive should be amended to recognize the particular vulnerability of youth in general and children under 12. Children under 12 should not be detained in police holding facilities. For children under 12, officers must explore all other options and contact the young person’s parents before they are detained.
12o iii	Section K of the Youth Crimes Investigation Directive should be amended as follows: Children under 12 shall not be subject to strip searches.
12o iv	Section E.3 of the Youth Crimes Investigation Directive should be amended as follows: Pre-charge diversion shall be considered for young persons with prior involvement with the law, which can be characterized as minor in nature.
12p	The Police School Response Program (referred to as School Resource Officer (SRO) should be terminated effective immediately allowing the school boards to establish appropriate protocols.
12q	Acknowledge that racialized persons who reasonably believe that they are being racially profiled can be expected to find the experience upsetting and might well react in a disrespectful manner. A trauma informed approach means a person’s use of disrespectful and negative language toward the officer requires reasonable tolerance and tact and cannot form the basis of further differential treatment;

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12r	Acknowledge that racial profiling and racial discrimination violate the <i>Code</i> , Charter , and the <i>Community Safety and Policing Act, 2019</i> with references to relevant case law and; The principles that apply to claims of racial discrimination, such as how intent is not required and how it may be proven by circumstantial evidence and inference;
12s	PRP should develop a mechanism for officers to report discrimination which protects the confidentiality of the reporting officer, subject to any legal restrictions
12t	Regularly assessing deployment patterns for concerns about racial profiling, consistent with the OHRC's Policy on Eliminating Racial Profiling in Law Enforcement.
12u	The PRP should develop a policy on the use of artificial intelligence that: - Acknowledges the demonstrated potential for AI technologies to infringe on human rights and exacerbate systemic racism and discrimination if they are implemented without sufficient safeguards for individuals' rights. - Ensures that artificial intelligence, including biometric identification technologies, are not being used in discriminatory ways; this includes, but is not limited to, racial discrimination. - In the acquisition and development of procedures for AI technologies, commits to meaningful engagement with the public and experts in <i>Charter</i> compliance, and any other experts as required. - Permits the PRP to use AI technologies only after passing community review to the greatest extent possible, and subject to privilege and confidentiality, and privacy and human rights assessments. As part of these assessments, an expert in racial bias in data science shall be consulted, as well as the IPC and the OHRC. The assessments should not be completed by third parties that are paid by or otherwise have a relationship with the vendor of the technology that would pose a conflict of interest. - AI technologies must also satisfy the principles from the federal-provincial-territorial privacy guidance on facial recognition for police agencies, and the Global Privacy Assembly's "Principles and Expectations for the Appropriate Use of Personal Information in Facial Recognition Technology", specifically its positions on protections for human rights. - To the greatest extent possible, make public all information on PRP's use of AI technologies, including but not limited to: a) details on their purpose, how and when they are used; b) what data are collected, how the data are used, and when the data will be disposed; and c) assessments and evaluations of the technologies and their use. - Establish criteria for when human oversight and interventions are required and requires sufficient resources to be allocated to perform this oversight role. - Provide a mechanism for hearing and addressing public complaints regarding the consequences of using AI, which recognizes that rights holders are not well-positioned, and are therefore at a disadvantage to demonstrate their claim as they do not have access to data held by PRP.

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12v	Ensure that officers are aware of the potential racial bias which may flow from the use of artificial intelligence tools, and the impact of artificial intelligence on officer deployment decisions.
13	PRP should revise the Directive on Diversity Relations and Anti-Discrimination, I-B-136 (F) as follows:
13a	Recognize and condemn the presence of systemic racism in policing in Peel;
13b	Acknowledge the nature and historical context of racism, including its particular origins and impact on Black, Indigenous and other racialized communities;
13c	Identify the principles that apply to claims of racial discrimination, such as how intent is not required and how it may be proven by circumstantial evidence and inference.
Policy on Laying a Charge	
14	PRP should ensure its procedures on laying a charge include:
14a	The requirement that all officers approach all interactions with Black, Indigenous and other racialized persons, including youth and adults, in a manner that takes into account histories of being over-policed, and use alternatives to charges and arrests, where appropriate. This includes and builds upon the requirement from the <i>Youth Criminal Justice Act</i> that police officers consider the use of extrajudicial measures, such as informal warnings, police cautions, or referrals to community resources, before deciding to charge a young person;
15	The PRP should conduct audits of charges laid for the following provincial offences, and administration of justice charges at the organizational level, with the intent to move to the unit level. These audits should monitor whether Indigenous or Black persons are over-represented in: i. Trespassing ii. Out-of-sight driving offenses (including driving without a valid licence, driving without valid insurance, driving while suspended, etc.) iii. Failure to comply with a condition, undertaking or recognizance The data collected and the result from the audits should be released publicly, with the goal of doing this annually.
Policy on Use of Force: PRP's Directive on Incident Response	
16	Amend PRP's Directive on Incident Response, including Section D and Section E (3), Section H(8), Section I, and Section K to require communication and de-escalation techniques, prior to all use of force options, whenever possible.
17	PRP's incident response directive should clarify the concept of disengagement. The procedure should state that disengagement includes the goals of taking the time to de-escalate and re-position where it is appropriate and safe to do so, in order to avoid using force.
18	PRP's Directive on Incident Response should be amended to limit the use of force options that can be applied to children under 12. De-escalation should be used extensively with children. Thereafter age-appropriate soft hand, crisis prevention techniques should be explored or used before any weapon or restraint is applied. Officers should only utilize use of force options as a last resort on children under 12 and

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	only if the child is in possession of a weapon which poses an imminent threat of serious physical injury or death to themselves or another person. In addition, the use of force option used by an officer on a child under 12 shall not offend the following principles: • Any use of force on a child cannot be degrading, inhumane, or result in harm or the prospect of harm. • The seriousness of the child's misbehaviour is not relevant to deciding whether the force used was reasonable. The force used must be minimal, no matter what the child did.
19	PRP should review and if necessary, conduct an investigation into the circumstances that result in the discharge of a CEW.
20	The Incident Response directive should reflect that when dealing with vulnerable populations, including elderly, children under 12, mentally disabled, exhibiting behavioural issues should be treated as being "in need of protection".
20a	Where possible, use de-escalation techniques which are tailored and appropriate when engaged with vulnerable populations.
20b	Section J (15) of the Directive on Incident Response should be amended to discourage the use of CEWs on all children, not just "children under 12".
20c	PRP shall ensure that officers produce a report to their supervising officer every time force is applied to a child age 12 and under. This report must be reviewed by the supervising officer and qualifying use of force instructor to confirm that appropriate de-escalation steps were taken and that the use of force was made as a last resort.
20d	If an officer fails to take appropriate steps to de-escalate a child, ensure accountability measures are in place to address the incident.
20e	The Chief shall make a report to the PPSB regarding disciplinary measures imposed against an officer who has used unjustifiable force against a child 12 and under, subject to the confidentiality provisions of the CSPA.
21	PRP agrees adopt a 'zero harm / zero Death' approach to use to force incidents, including zero tolerance for excessive force. In accordance with a recommendation from the Honourable Frank Iacobucci's report on Police Encounters with People in Crisis, Toronto Police Services and Toronto Mayor John Tory agreed to adopt a 'zero death / zero harm' commitment to preserving the lives of persons in crisis. PRP should adopt this objective for all civilians, however particular emphasis should be placed on interactions with racialized persons and persons in crisis as these groups are overrepresented in encounters with the police which result in the use of deadly force. As part of this strategy TPS has explored the use of less lethal use of force options. In order to achieve this objective, PRP will continue to advocate for the Mobile Crisis Rapid Response Teams (MCRRT) to be adequately resourced and available to all divisions on twenty-four (24) hour basis seven days a week.
22	Incident Response Directive should be amended to incorporate the following principles:
22a	Require officers to exhaust all other reasonable alternatives before resorting to using deadly force.
22b	Prohibit officers from using lethal force or shooting at individuals unless the individual is using deadly force, causing serious bodily harm or pose an imminent threat of death or serious bodily harm.

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22c	Require officers to intervene to stop another officer from using excessive force and to report this to their supervisor afterwards.
22d	Alternative communication techniques when engaging with individuals experiencing a mental crisis, who may not be able to understand or comply with the Police Challenge discussed in Section L.
22e	Amend Appendix A, consisting of the graphical depiction of Preferred CEW Target Zones, to avoid individuals' genital areas.
22f	Review body-worn camera (BWC) footage following all reported use of force incidents to determine if misconduct or discrimination were a factor in the officer's decision to use force.
22g	Officers should be required to immediately provide aid when a subject suffers injury as a result of an application of force.
22h	In accordance with case law regarding use of force, the incident response procedure should note that use of force by members should be proportional.
	Police School Protocol and Officer Engagement with students
23	The Peel Regional Police ("PRP") should conduct a thorough review of any existing or planned policies which address officer engagement with minor students, with the aim of limiting police involvement in schools (K-12). As part of this review, the independent expert should consult with Black, Indigenous and racialized communities in Peel, particularly parents and children in Peel schools and the Anti-Racism Advisory Committee.
24	The PRP should immediately make any necessary modifications to the protocol after the review has been completed to ensure that it is in compliance with the Ontario <i>Human Rights Code</i> , the <i>Youth Criminal Justice Act</i> , and the <i>Canadian Charter of Rights and Freedoms</i> .
25	The PRP should engage the signatories to the Local Police School Protocol, including the Peel District School Board, and take steps to ensure that any future protocol or directive regarding police interaction with youth in schools incorporates perspectives from the Human rights project's use of force and data collection experts.
26	PRP should take immediate steps to ensure that any future police school protocol that addresses, "Occurrences Involving Students Under Age 12" includes the following: a) All calls received from the school system to address student behaviour should be directed to appropriate agencies in all possible circumstances; b) If there are circumstances where police respond to behavioural issues, Mobile Crisis Rapid Response Team should be dispatched. c) If a school requests the assistance of PRP to address the behaviour of a student, the following information must be collected and relayed to the Mobile Crisis Rapid Response Team that will attend the scene: i. Whether or not the child has any known mental health issues. ii. Whether the school attempted to contact the child's parent or guardian. iii. Whether the child has a safety plan in place, and the de-escalation strategies recommended in the safety plan.

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	d) PRP shall make best efforts to engage partners in the mental health sector to assist with the implementation of these recommendations.
27	Future policies or directives regarding student officer engagement should include a prohibition on attending schools to investigate matters which do not have an impact on school climate unless (a) there are legitimate concerns about the loss of evidence, or (b) failure to investigate will result in harm to an identifiable person.
27a	Investigating incidents that have no impact on school climate
27a i	The OHRC recommends that officers are prohibited from attending schools to investigate matters which do not have an impact on school climate.
27a ii	Officers should only engage students on school property to investigate an incident that has no impact on the school climate when: (a) there are legitimate concerns about the loss of evidence, or (b) failure to investigate will result in harm to an identifiable person.
Human Rights-Based Data Collection	
28	The PRP should work with an independent expert mutually agreed upon by the OHRC and the PRP to create a policy on human rights-based data collection that ensures protection of privacy, involvement of affected communities, and limits the use of the data to human rights-related purposes only.
29	PRP should develop race and identity-based data community advisory panel (CAP). The panel should include members of the Indigenous, Black, South Asian, and other racialized communities, ideally with expertise in data management whenever possible. The CAP members should provide input on PRP's race and identity-based data collection (RIBDC) initiatives. The CAP should not replace ongoing community consultation.
30	PRP will continue to, in a phased approach, make their race and identity-based data publicly available, formatted for public consumption, shared online and analyzed in a manner that does not contribute to, or stigmatize racialized groups.
31	Collect, analyze and publicly release human rights-based data on an annual basis, along with intersectional identity data, on the full range of police-civilian interactions, including stop and question activities, traffic and pedestrian stops, charges, arrests, releases and use of force. This should include:
31a	Incidents where officers are required to complete a use of force report and where a civilian sustains a physical injury as a result of force being used, regardless of the extent of any such injury or medical treatment received ("use of force incidents that result in physical injuries"); which includes: i. Race, Indigenous ancestry, age and gender of the subject. ii. Whether the subject had or was perceived to have a mental health disability, was experiencing a mental health crisis or was intoxicated on drugs or alcohol at the time of incident.

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	iii. Number of subjects directly engaged during the interaction. iv. All type(s) and levels of force used and their sequence. v. Name, age, race, gender, rank, badge number, years of experience, assignment, platoon, unit and division of the officer(s) who used force. vi. Location where the use of force occurred, including postal code, patrol zone and X-Y coordinates. vii. Location where the subject lived, including postal code and patrol zone. viii. Any injuries sustained by the officer and/or the subject and medical services requested or received. ix. A detailed description of the circumstances and the subject's actions that led to the use of force including: 1. The reason for the initial stop or enforcement action. 2. Whether the incident occurred during an officer-initiated contact or a call for service. 3. Whether the subject was in possession of a weapon, the type of weapon and when the police became aware that the subject possessed the weapon (i.e. before use of force or after arrest). 4. Whether the subject was handcuffed or otherwise restrained during the use of force. x. Whether the subject was charged with an offence, and, if so, which offence(s) and their disposition. xi. Whether a search was conducted of the subject, and if so, when and on what basis the search was made; and the level of search conducted. xii. Whether, when and how verbal or other de-escalation techniques were employed. xiii. Whether the SIU was notified of an incident, and if so, when. xiv. For firearms-related incidents where an officer discharged a firearm, the number of shots fired by each involved officer and the accuracy of the shots. xv. For incidents where an officer discharged a conducted energy weapon, the number of times it was discharged by each involved officer, the mode it was in when discharged (drive stun or full deployment) and where on the subject it was discharged each time. xvi. The length of time between the use of force and the completion of each step of the force investigation and review. xvii. Presence or absence of body worn camera and time stamping of when it was turned off and on within the five hours before and after the incident.
31b	Detention, charge, arrest and release decisions; which includes: i. Information about the person charged/arrested/released, including 1. Race 2. Indigenous ancestry 3. Age

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	4. Gender 5. Whether the subject had or was perceived to have a mental health disability. ii. Information about any conditions of release imposed, such as any undertakings required for release; and iii. Any determination to detain the person for a bail hearing (i.e., a show cause hearing), including the factors used to determine the need to detain the person. iii. Information on chargeable persons who are not charged due to criminal incidents being “cleared otherwise,” including a specific breakdown of all UCR “cleared otherwise” categories (e.g., “departmental discretion,” “diversion program,” “incident cleared by a lesser statute,” etc.).
31c	Where the data reveals race-based disparities in service delivery, the PRP should take immediate steps to inform the PPSB and enact an action plan to eliminate the disparity within one year.
31d	PRP should expand its race data collection efforts to include data on wrongful convictions; low-level administration of justice charges, data on response times, police stops, diverted charges and strip searches.
31e	PRP should collect self reported data from individuals they interact with through post engagement surveys.
32	PRP should:
32a	Publicly release data annually in a manner that allows for meaningful analysis of the data collected by PRP, through the development of an open data portal. PRP should post all data collected pursuant to the Data Collection Policy and RIBDC initiatives to the open data portal, subject to privacy and other considerations. This should include a location-based analysis of use of force patterns across Peel, and a strategy to address any disparities that emerge.
32b	Develop privacy guidelines for the collection, use and disclosure of human rights data in consultation with the Information and Privacy Commissioner of Ontario;
33	PRP should require all senior managers and data specialists to undergo training on Ontario’s Data Standards for the Identification and Monitoring of Systemic Racism.
34	PRP should collect data on (1) number of calls received concerning children 12 and under, (2) calls PRP responded to for children under 12, (3) calls responded to for children under 12, and (4) the number of referrals to community organizations, children’s aid societies, or families that were made in response to calls for children under 12.
35	PRP and PPSB should amend their policies and directives related to race data collection and use of force to remove any prohibition on the use of race-based data in performance management. This data should be used when evaluating officer performance.
	Monitoring and Accountability

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36	On an annual basis PRP will retain an independent verifier with the subject matter expertise approved by PRP and OHRC who will work with a sub-committee of ARAC members to verify the completion of all implemented recommendations and report publicly to PPSB annually. The verifier will:
36a	Collaborate with the anti-racism Advisory sub-committee.
36b	Ensure any inquest recommendations are completed i.e. Carby, Ekamba or any other present or future recommendations from a Coroner's jury are implemented.
36c	Ensure that all actioned recommendations under each principle are completed.
Monitoring Legal Decisions	
37	PRP should establish a process within the service to search and track negative findings about an officer's testimony or conduct in decisions of courts or tribunals, correspondence from LECA, SIU Director, or any legal decision involving a Charter breach that reflects conduct consistent with anti-Black racism, racial profiling, or discrimination. This process should help supervisors review these concerns in one centralized location.
38	The PPSB should develop a policy which sets out the steps for receiving, implementing and publicly reporting on all recommendations from coroner's inquests directed to the PRP or PPSB, or recommendations directed to all police services in Ontario.
Body Worn Cameras	
39	If PRP proceeds with deploying body worn cameras to frontline officers, they shall develop and implement a policy governing the use of the body-worn cameras that includes:
39 a	Clear criteria for when officers must record, and require officers to provide concrete, simultaneous justifications on camera for failing to record required events. For example, officers should begin recording at the earliest opportunity, prior to any contact with a member of the public, whenever that contact is for an investigative or enforcement purpose, and regardless of whether or not the person is within camera view, unless an exception applies. Officers should not record the following interactions: (i) unauthorized surreptitious conversations with any person; (ii) a strip search and/or body cavity search under any circumstance; (iii) attendance in a courthouse, except in exigent circumstances, or under legal authority;

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	(iv) attendance at a designated healthcare facility, except for the following: • under exigent circumstances; • under the authority of prior judicial authorization; • where officers have custody of a person who is being treated or is waiting for health care treatment and the officers are alone with that person; • where the Officer has custody of a person who is being treated, or is waiting for health care treatment, and the officer reasonably believes that the interaction between the officer and the person in their custody requires or might soon require the use of force; or, • with the express consent of the person is the subject of the recording; and, (v) patient care from a Paramedic, except under exigent circumstances. (vi) during police-civilian contact or activities that are not investigative or enforcement in nature (e.g., informal interactions) (vii) in a private dwelling unless: -there are exigent circumstances, -under the legal authority of a warrant, -in a situation where an officer's lawful presence in a private place is conditional on the owner's/occupant's consent to being recorded, and -the officer has provided the owner/occupant with a reasonable opportunity to refuse such consent. If the owner/occupant requests that the interaction not be recorded, the officer must stop recording. (viii) Recording in religious and spiritual places except: -in relation to a specific investigative or enforcement purpose.
39 b	(b) Police policies and procedures should provide that if a member of the public requests that an officer stop recording or refrain from recording in circumstances where the officer is required or permitted to record and the individual is not being detained or under arrest, the officer must: (i) inform the individual that while the camera must stay on, they are free to discontinue the interaction, including by leaving the scene (ii) respect their right to do so.

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39c	Addressing personal privacy concerns by specifically, among other things, protecting categories of vulnerable individuals (e.g., victims of sexual assault) from being recorded without their informed consent. Privacy guidelines should be developed in consultation with the Information and Privacy Commissioner of Ontario;
39d	Requiring officers to file an initial written report or statement before relevant footage is reviewed, for all incidents;
39e	Requiring the police service to delete all footage within two to three years, with exceptions for recordings that have been determined to be relevant to a criminal or civil investigation or proceeding, including officer disciplinary proceedings;
39f	Expressly prohibiting both footage tampering and unauthorized access, and ensuring that all access to recorded footage will be logged or audited;
39g	Expressly allowing individuals who are filing police misconduct complaints to view all relevant footage in an accessible and expedient manner;
39h	Prohibit the use of biometric technologies (e.g., facial recognition, including mug shot databases) to identify individuals in footage.
39i	Criteria for when body-worn camera footage will be accessible including:
39j	Body-worn cameras shall be clearly affixed to an officer's uniform.
39k	Monitor and report publicly each year on the extent to which BWC are used in each division, and collect disaggregated race-based statistics on interactions captured by the use of body-worn cameras. This information should be collected, analyzed and publicly reported on as part of PRP's Human Rights Data Collection Strategy.
40	PRP should develop detailed procedures on the use of body-worn cameras in line with the policy prescriptions above, and ensure officers are appropriately trained on these procedures. In addition:
40a	Specify the frequency of reviews and require public reporting on them. The OHRC further recommends that at least quarterly, supervisors conduct both systematic and random audits of the body-worn and in-car camera recordings of officers under their command, to assess if officers are providing a service environment free from racial discrimination. The OHRC recommends that these reviews make sure footage from all front-line officers' BWCs is audited at least every two years.
40b	Require reporting to the PPSB (subject to confidentiality limitations in the CSPA) on the quantity and quality of supervisors' audits related to discrimination every year. In this reporting, identify how many instances of potential racial bias were identified, how many internal conduct complaints were initiated based on reviewing BWC footage, and the nature of any remediation or discipline of individual officers that followed.
Early Warning System	
41	PRP should establish an Early Warning System ("EWS") that captures all necessary information to alert supervisors to individual, platoon/unit/division conduct that needs to be addressed from the perspective of potential racial discrimination. This system should capture and flag patterns related to racial disproportionalities and disparities, including any race or identity-based data collected by PRP regarding the services provided by an officer that indicates a disparity or disproportionality. Once this data is flagged by an EWS system it should be analysed before further action is taken.

#	Detailed Recommendation
42	PRP should ensure that the Early Warning System is used within the context of monitoring, training, and review, consistent with labour relations requirements to track at-risk behaviour by:
42a	Establishing and implementing EWS performance indicators, including internal benchmarking, that will trigger supervisory review and possible referral to Professional Standards;
42b	Maintaining data on each officer's use of force, including each discharge of a firearm, and tracking this against established benchmarks.
42c	Ensure that EWS systems capture instances where officers report instances of misconduct, or racially biased policing committed by another officer.
42d	When flagged with established benchmarks in place, Command Staff and supervisors of the impacted police officer will be notified to evaluate performance; ensuring that command staff are notified when benchmarks are exceeded. PRP will provide timely and appropriate interventions and support to officers identified through the EWS. Interventions and support will be designed to assist officers in avoiding and correcting at-risk behavior.
43	The Early Warning System should capture <i>Charter</i> violations and a. Violations of the PRP body-worn and in-car camera procedures. b. All instances where the PRP learns: i. A decision not to prosecute any charge or ticket was based on concerns of the Crown Attorney about an officer's credibility. ii. A court or tribunal has made a negative credibility determination on an officer. iii. A court or tribunal has concluded that race or a race-related prohibited ground under the <i>Human Rights Code</i> was a factor in an officer's conduct. iv. An officer violated the <i>Charter</i> rights of a civilian, regardless of the court's decision to include or exclude the evidence flowing from the <i>Charter</i> breach. c. All internal and external misconduct complaints that allege racial discrimination or discrimination based on related prohibited grounds (e.g. place of origin or ethnic origin), including their disposition. d. All civil, human rights or administrative claims that allege racial discrimination or discrimination based on related prohibited grounds filed with or against the PRP, chief or the PPSB that result from the actions of PRP officers. e. All disciplinary action taken against officers for racial discrimination or discrimination based on related prohibited grounds. f. All non-disciplinary corrective action required of officers due to racial discrimination or discrimination based on related prohibited grounds.
43a	The Chief of Police should ensure use of force incidents are captured and reviewed by a supervisor to allow PRP to be proactive in the early detection and prevention process.

#	Detailed Recommendation
43b	If, in the course of the audits, the Body Worn Camera Unit discovers evidence of actions that may constitute misconduct, including allegations of racial discrimination, the matter will be referred for investigation under the <i>Community Safety and Policing Act</i> .
43c	PRP reports on the audits every year, and this reporting should identify how many instances of potential racial bias were identified, how many internal conduct complaints were initiated based on reviewing body-worn camera footage, and whether there was any remediation or discipline of individual officers that followed.
43d	When remedial efforts have not successfully addressed concerns about a pattern of racial disparity in an individual officer's activities, supervisors should consider if it is appropriate to refer the officer's conduct to Professional Standards.
	Accountability
	The Chief should:
44a	Consider formal findings of misconduct under the <i>Community Safety and Policing Act</i> , including those where there is a finding of racial discrimination, as a negative factor in promotional decisions.
44b	Where it becomes apparent during the course of an Investigation under <i>Community Safety and Policing Act</i> , that there may be allegations, or evidence regarding potential racial profiling or discrimination in allegations of officer misconduct against racialized individuals, the Investigator will proactively investigate those allegations, even where claims of racial profiling or discrimination are not explicitly raised by a complainant, witness, SIU Director, LECA, or any legal decision involving a Charter breach by the PRP;
44c	Investigate each allegation of officer misconduct raised by the SIU Director in letters to the Chief;
44d	The Chief shall automatically initiate a Chief's complaint investigation when findings or comments in decisions of the Human Rights Tribunal of Ontario, courts, correspondence from the LECA, SIU Director, or any legal decision involving a Charter breach by the PRP reflect conduct consistent with racial profiling or discrimination, if an investigation has not already been undertaken.
44e	Establish a process by which misconduct flagged by the SIU or otherwise identified by PRP that is consistent with racial profiling or discrimination is investigated and require the Chief to report to the Board regarding the findings and outcome of the investigation, including any discipline imposed. The Board may publish subject to the confidentiality concerns outlined in <i>the Community Safety and Policing Act</i> or raised by affected parties; and (58g) Ensure that all Professional Standards investigators are trained to identify violations of the <i>Human Rights Code</i> , including potential racial profiling/discrimination.
45a	The Chief of Police should ensure that: Performance management includes how well officers follow their training and procedures on body worn cameras, racial profiling, anti-Black racism/discrimination crisis intervention and de-escalation and how accurately they report use of force incidents with particular attention to interacting with BIPOC communities and those experiencing a mental health crisis.

#	Detailed Recommendation
45b	Supervisors should assess and ensure in annual performance reviews that any findings of contraventions 40(a) are addressed in training and or other internal processes.
45c	Criteria – for officer and supervisor annual evaluation – is made publicly available online.
45d	Establish an explicit criterion that experience with vulnerable populations including youth, elderly, people in crisis and those suffering any diminished capacity or functioning will be considered.
46	The OHRC recommends that the Peel Police Services Board establish policies to:
46a	Review the chief of police’s administration of:
46a i	Internal complaints when there are HRTO, court or tribunal findings of racial profiling or racial discrimination, or officer conduct consistent with racial profiling or racial discrimination, and report publicly, on an annual basis about this.
46a ii	Section 11 reports (section 81 <i>CSPA</i>).
46 a iii	Request and review decision letters from the SIU Director to the Chief. The OHRC recommends that PRP’s Special Investigations Unit Procedure (13–16) is amended to direct PRP to include a copy of the SIU Director’s Letter to the Chief with the Section 11 report when it is sent to the PPSB.
46b	Request and review decision letters from the SIU Director to the Chief.
47	As part of the PPSB’s ongoing responsibility to review the Chief’s administration of the complaint system, PPSB should continue to direct the Chief of police to report on the aggregate number of instances where informal discipline is used to address conduct consistent with racial discrimination, subject to the confidentiality provisions of the <i>CSPA</i> . This may take the form of public reports which do not identify the parties involved.
48	The Chief of Police should produce and provide to the PPSB an annual list of all recognized instances of racial profiling and racial discrimination committed by police officers through decisions of the Human Rights Tribunal of Ontario, courts, and Disciplinary Tribunal, along with details on what corrective or disciplinary actions were taken in response, subject to the confidentiality provisions of the <i>Community Safety and Policing Act</i> .
48a	This list should be publicly released annually and not include information that would violate the confidentiality provisions of <i>Community Safety and Policing Act</i> .
48b	PRP should publish clear and transparent policies in place to address instances of racial bias or excessive use of force.
	Training
49	PRP should work with Black communities and one or more external experts agreed upon by the OHRC to develop and implement regular, detailed, scenario-based and ongoing human rights-focused training, to new recruits, current officers, investigators and supervisors on:
49a	Racial profiling, racial discrimination and service outcomes based on the application of unconscious/implicit bias;
49b	Developing concrete strategies for acknowledging and monitoring officers’ own biases;

#	Detailed Recommendation
49c	Crisis Prevention Intervention and using a trauma-informed approach to policing; Provide new recruits and experienced officers with training on techniques for containing crisis situations wherever possible to slow down the course of events and permit the involvement of specialized teams such as the Mobile Crisis Rapid Response Team if required (Carby Inquest);
49d	The use of force continuum with an emphasis on verbal communication and de-escalation.
49e	Using the circumstances of the Jermaine Carby shooting as a training scenario to examine whether new recruits or experienced officers demonstrate awareness of issues regarding: i. "unconscious bias" in the exercise of police discretion concerning traffic stops, ii. the most effective methods of de-escalation, if the need develops, and iii. decision-making to select the lowest level of force appropriate if use of force should be required (Carby Inquest);
49f	Providing specific training relating to situations involving persons with an edged weapon, i. where the person has failed to respond and/or comply with police commands (i.e. "Drop the knife"), train officers to stop shouting those commands and to attempt different defusing communication strategies, and ii. train officers in such situations to coordinate amongst themselves so that one officer takes the lead in communicating with the person so that not all officers are shouting simultaneously (Carby Inquest);
49g	The impact of racial profiling, racial discrimination, and unconscious/implicit bias on community police relations;
49h	The protection of human rights as central to the police mandate and essential to effective policing;
49i	How racialized persons who reasonably believe that they are being racially profiled may find the experience upsetting and might react in a disrespectful manner. Officer should use a trauma informed approach and exercise reasonable tolerance when a person is using disrespectful language in this context. Officers should not view a person's use of language in this regard as the basis for differential treatment;
49j	How to recognize and deal with fears, anxieties or biases that may contribute to their use of force decisions;
49k	The nature and historical context of racism, including its particular origins and impact on Black communities;
49l	How racial profiling and racial discrimination violate the <i>Code, Charter, Community Safety and Policing Act, 2019</i> with references to relevant case law;
49m	How officer deployment and artificial intelligence can contribute to racial profiling and racial discrimination;
49n	Effective community relations, including viewing members of the community as partners in public safety;
49o	Ensure that officers are trained and encouraged to intervene when they witness misconduct, including inappropriate or excessive use of force, or racially biased policing, being committed by another officer;

#	Detailed Recommendation
49p	Alternatives to charges, such as issuing a caution or extrajudicial sanctions;
49q	The principles that apply to claims of racial discrimination, such as how intent is not required and how it may be proven by circumstantial evidence and inference;
49r	Provide new recruits and experienced officers with enhanced training regarding in-cruiser databases such as the Canadian Police Information Centre (C.P.I.C.) and the information they contain (Carby Inquest); and
49s	Provide new recruits and experienced officers with additional training regarding effective communication of relevant C.P.I.C. and current situation information with other officers at the scene so that all officers share a common understanding of the situation and approach (Carby Inquest).
50	Consider the most appropriate methods (including external consultation) to measure whether the training has been effectively delivered and absorbed by those receiving the training in recommendations.
50a	Develop a method to objectively measure the effectiveness of officer training (both initial and continuing) for unconscious bias, mental health issues, de-escalation and use of force. Officers should be tested, graded and must meet a benchmark in order to pass (Carby Inquest).
	PRP should ensure that the training:
51a	Is developed in partnership with external training experts familiar with pedagogical best practices including effective design and evaluation;
51b	Includes an attitudinal component using scenario-driven learning modules to facilitate the identification of racial profiling and racial discrimination in investigations, including scenarios dealing with suspect selection, detention, searches, charges, arrests, use of force and conflict de-escalation;
51c	Is evaluated on an ongoing basis. Officers should pass training or demonstrate through the annual requalification process that lessons have been absorbed and retained. This evaluation should include an assessment of officers' skill in handling in mental health and/or addictions, anti-racism, de-escalation and crisis communication, etc.;
51d	Is connected to policies and procedures around racial profiling and racial discrimination, and specifically identifying and countering anti-Black racism in stop, question and searches; charges and arrests; and use of force;
51e	Is evaluated with reference to outcome measures pertaining to disparity reductions (or a lack thereof) in stops, searches, use of force and other police practices, as well as external independent audits of show cause reports, particularly the subjective character/personality assessment elements of such reports; and
51f	Development and implementation include active and ongoing involvement by racialized communities, primarily those that identify as Black, as well as those who identify as Indigenous.
52	PRP should amend the Use of Force recertification to include qualification in areas such as mental health and/or addictions, anti-racism, particularly anti-Black racism, racial profiling and its sources including systemic, conscious, and unconscious bias, fear inoculation, de-escalation and crisis communication.

#	Detailed Recommendation
53	PRP should ensure Divisional Mobilization Unit officers receive specialized training on engaging with racialized youth and de-escalating situations with youth in age-appropriate ways.
54	Enhance efforts to ensure that officers are fit for service before they engage with the community.
Reducing the Scope of Police Activities	
55	PRP should deploy a Mobile Crisis Rapid Response Team (MCRRT) to emergency priority calls that have a known element of mental health that is contributing (crisis) to the incident. All efforts to reduce the crisis including de-escalation techniques both physically and psychologically should be made. PRP should make it a priority to build partnerships with mental health professionals with capacity to support first responder or community-led response to mental health calls. Priority should also be placed to leverage innovative tools that increase the connection or support from a mental health professional(s) during calls where mental health is a known contributing factor.
56	PRP should publicly release information annually about officer activities, in a way that enables the public to understand how officer time is spent. This should work towards including a breakdown of how long a front-line officer spends responding on calls or engage in proactive enforcement during a typical shift. Categories such as responding to non-criminal calls, traffic, other crime, property crime, medical, person in crisis, violent crime or proactive enforcement. Similar categories are used in some US jurisdictions. These categories can be used along with the information provided about priority calls in the current annual reports.
57	PRP should publicly release information annually about the calls for service it receives, in a way that enables the public to understand how many calls relate to social issues, for example mental health, addictions, or homelessness.
58	PRP and PPSB should support the development and expansion of civilian-led mental health crisis responders.
59	PRP should continue to work with CMHA Peel Dufferin, Punjabi Community Health Services (PCHS) and Roots Community Services or other service providers to improve access to community crisis workers in order to better respond to mental health calls reported to PRP.
Diversity in Employment	
60	PRP should conduct and publicly report on a workplace census every two years.
61	PRP should publicly commit to working toward ensuring the police service and its leadership is as diverse as the community it serves by 2025, including in supervisory and leadership positions.
62	PRP should work with an external expert to ensure that the psychological testing that PRP requires new applicants to undergo includes testing of the applicant's biases and abilities to appropriately handle crisis situations. This data should be used to support ongoing training and development.

#	Detailed Recommendation
63	PRP should establish Key Performance Indicators, benchmarks and targets on their employment equity initiatives and publicly report on this to the Peel Regional Police Services Board (PPSB) annually.
64	When making decisions about promotions, supervisors should consider an officer's skill and experience in dealing with Emotionally Disturbed Persons (EDPs), members of the Black community and racialized communities, including their ability to de-escalate and negotiate during crisis situations. Outreach and engagement with racialized communities and involvement with anti-racist work should also be considered.
65	When making decisions about hiring officers PRP should consider whether the candidate has obtained post secondary education.
66	Create and publish a multi-year action plan that incorporates the OHRC's recommendations and includes timelines for completion. The Anti-Racism Advisory Committee should be involved in establishing this action plan. This action plan should be reviewed and approved by the Independent Verifier and then submitted to the OHRC for final approval.
67	PRP shall explore options with the OHRC to identify alternative approaches to service delivery through the reallocation of resources to support community-based health, wellness and equity initiatives, such as mental health supports, the establishment of a crisis intervention centre, and youth engagement, to support the safety and advancement of the Black and Indigenous communities. PRP should work with the cities of Mississauga and Brampton to develop a non-emergency response unit. This unit should include a component that focuses on serving the needs of Black and Indigenous clients.

GLOSSARY OF TERMS

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

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

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

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

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

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

CSPA: Community Safety and Policing Act (formerly Ontario Police Services Act)

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

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

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

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

Disposition: The status or outcome of an investigation.

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

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

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

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

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

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

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

HRTTO: Human Rights Tribunal of Ontario

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

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

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

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

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

KPI: Key Performance Indicators

LECA: Law Enforcement Complaints Agency (formerly OIPRD) is an independent civilian oversight agency, responsible for receiving, managing, and overseeing public complaints about police misconduct.

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

MCRRT: Mobile Crisis Rapid Response Teams

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

PPSB: Peel Police Services Board

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

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

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

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

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

SIU: Special Investigation Unit

SME: Subject Matter Expert.

Statute: A written law passed by a legislative body.

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

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

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

UCR: Statistics Canada's Uniform Crime Reporting Survey.

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