



Toronto Police Service Board  
40 College Street  
Toronto, ON  
M5G 2J3

Dear Members of the Toronto Police Service Board,

I am writing on behalf of Allied Voices for Israel (AVI) to contribute to the Toronto Police Service Board's consultation on the new Public Order Policy. Our organization is dedicated to Jewish allyship and advocating for peace and coexistence. Given the rise in hateful pro-Palestinian and anti-Israel sentiments, it is crucial to address the policing of such protests, demonstrations, and occupations effectively to ensure the safety and security of the Jewish community in Toronto.

## **Recommendations for Effective Policing and Implementation**

### ***1. Strict Enforcement of Constitutional Rights with Clear Boundaries***

Protecting the constitutional rights to freedom of expression and peaceful assembly is crucial, but these rights should not be exploited to justify hate speech or incitement to violence. TPS must be trained to distinguish when protests cross into illegal territory, particularly when they involve hate speech targeting the Jewish community. Officers should receive specific training on the legal boundaries between free speech and hate speech, using real-world scenarios to prepare for actual protest situations. Immediate arrest and prosecution of individuals engaging in antisemitic language, symbols, or gestures should be enforced under relevant sections of the Criminal Code, such as Section 319 (Public Incitement of Hatred).

### ***2. Immediate Intervention and Rapid Response***

The Public Order Policy should mandate immediate intervention when hate speech or violence is detected. TPS should establish and maintain specialized rapid response teams trained in both de-escalation tactics and the lawful use of force when necessary. These teams should be strategically deployed in key areas, such as Jewish neighborhoods and near synagogues, to ensure swift and decisive action to prevent escalation and protect vulnerable communities. Officers in these teams must be equipped with body cameras to document all interactions, providing clear evidence for any legal proceedings.



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### ***3. Establishing and Enforcing Safe Access Zones***

TPS should establish permanent safe access zones around synagogues, Jewish schools, community centers, and other sensitive sites. Protests should be prohibited from approaching within a specific distance (e.g., 500 meters) to prevent intimidation and disruption. Officers should have clear directives to disperse and arrest protestors who violate these safe access zones, ensuring these areas remain secure and free from harassment. This approach not only protects the community but also ensures that protests do not interfere with the normal functioning of these critical institutions.

### ***4. Strict Enforcement of Existing Laws***

TPS must rigorously enforce existing laws related to mischief, trespassing, and unlawful assembly during protests. Officers should issue warnings to protestors obstructing traffic or access to businesses, followed by arrests if they do not comply promptly. Clear protocols must be established to ensure consistent enforcement of these laws across all protests. This consistency will reinforce the message that unlawful behavior during protests will not be tolerated and that the rule of law will be upheld.

### ***5. Protocol for Swift Removal of Encampments on Private Property***

When encampments are established on university campuses or other private properties, particularly when they involve hate speech or disrupt the normal functioning of the institution, TPS should coordinate with university administrations to dismantle these encampments within 24 hours of their establishment. Officers should issue immediate trespass notices and remove individuals who do not comply. Any materials containing hate speech should be confiscated and used as evidence in prosecuting offenders. This prompt action is necessary to prevent encampments from becoming entrenched and to maintain the safety and order of the affected areas.

### ***6. Comprehensive Antisemitism and Hate Crime Training***

TPS should implement a detailed training program focused on antisemitism and hate crime enforcement. This should include mandatory training sessions for all officers, with updates on emerging hate groups, symbols, chants, slogans, and tactics. Specific modules should cover the IHRA definition of antisemitism, ensuring officers can distinguish between legitimate criticism of Israel and hate speech. Scenario-based training should be provided to prepare officers for real protest situations involving antisemitic incidents. Continuous education on



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these issues will ensure that TPS remains capable of addressing the evolving nature of hate speech and hate crimes effectively.

## **7. Monitoring, Documentation, and Accountability**

All interactions during protests should be thoroughly documented. Officers should be equipped with body cameras, and footage should be reviewed as part of post-event evaluations. Recorded evidence should be used to inform future training and hold officers accountable for enforcing the policy. Any failure to act against hate speech or violence should be addressed promptly with appropriate disciplinary measures. This will ensure transparency, build public trust, and reinforce the commitment of TPS to uphold the law impartially.

### **Adopting the IHRA Definition of Antisemitism**

The Toronto Police Service Board should adopt the International Holocaust Remembrance Alliance (IHRA) definition of antisemitism as the standard framework for identifying and addressing antisemitic behaviors during protests. The IHRA definition should be fully integrated into TPS policies and procedures, serving as the foundation for identifying antisemitic incidents. Officers should receive detailed training on this definition, including practical examples, as part of both the mandatory curriculum for new recruits and ongoing professional development for current officers. The IHRA definition should guide the enforcement of hate speech laws, with consistent monitoring during protests to ensure accountability.

### **Incorporating the 3Ds Framework by Natan Sharansky**

In addition to adopting the IHRA definition, TPS should incorporate the “3Ds” framework proposed by Natan Sharansky to identify when criticism of Israel crosses into antisemitism. The 3Ds framework—**Demonization, Double Standards, and Delegitimization**—provides clear criteria for distinguishing legitimate criticism from antisemitic behavior:

- **Demonization:** Criticism that portrays Israel as inherently evil or compares Israeli actions to those of the Nazis should be recognized as antisemitic and immediately addressed by law enforcement.
- **Double Standards:** Applying a different set of standards to Israel than to other countries, such as singling out Israel for criticism while ignoring or downplaying similar actions by other nations, should be identified as antisemitism.
- **Delegitimization:** Questioning the very right of Israel to exist or denying the Jewish people’s right to self-determination should be treated as a form of antisemitism and responded to accordingly.



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## Conclusion

A robust and actionable Public Order Policy is essential for safeguarding the Jewish community and upholding the rule of law in Toronto. This policy should prioritize the protection of vulnerable communities, enforce zero tolerance for hate speech and violence, address the illegal occupation of public spaces, and integrate both the IHRA definition of antisemitism and the 3Ds framework into all TPS practices. Enhancing police training in antisemitism and hate crime enforcement is crucial to achieving these goals.

Furthermore, we are committed to maintaining a strong and collaborative relationship with the Toronto Police Service. We believe that through ongoing dialogue, training, and cooperation, we can work together to ensure that Toronto remains a safe and inclusive city for all communities. We appreciate the opportunity to contribute to this consultation and strongly urge the Board to implement these specific recommendations to strengthen public order and community safety.

Thank you for your attention to this important matter. We look forward to the outcomes of this consultation process and continuing our partnership with the Toronto Police Service.

Sincerely,

**Daniel Koren**

Founder & Executive Director  
Allied Voices for Israel