August 30, 2024

Toronto Police Service Board  
40 College Street  
Toronto, ON Canada M5G 2J3  
**RE: Public Order Policy Consultation**  
  
Dear Toronto Police Services Board Office,

Recent events have demonstrated the need for a neutral police presence at protests and demonstrations. However, they have also highlighted a growing distrust of police neutrality among civilians. Questions are rightly being asked about who Service members protect more readily and who they are less attentive to. This begs the question, is the TPSB doing enough to ensure officer compliance with its policies and procedures?

I believe that a new, third-party Public Order Policing Review Committee (POPRC) is required to hold individual Service members accountable for biased, preferential, or unreasonably forceful conduct while policing protests/demonstrations. A POPRC would also be responsible for proposing changes to TPS policies and procedures to better align the Service with emerging evidence-based policing practices and public feedback. To carry out this mandate, a POPRC would require substantial autonomy and authority beyond the TPSB. This means that, alongside being a separate entity from the TPSB, a POPRC must not contain active Service members and must not exceed 50% of its composition as former Service members. For a review committee of this kind to be effective, it must combine Service member expertise with expertise from civilian professionals and advocates. I urge the Board to begin the creation of this new POPRC immediately, as a demonstration of their commitment to public safety and as a visible impact of the current public consultation process.

Public order policing is a necessary yet reactive function of TPS. Considering recent budgetary concerns, it is worth asking whether TPS is effectively allocating its public order policing funds. One glaring example comes to mind of overspending and under-delivering within TPS: the mounted unit. More than $6 million annually is spent on the upkeep of this niche unit. That is $6 million that could be better spent on proactive, community-oriented policing measures, or altogether redirected towards social services that address the root causes of public order infringements. The mounted unit can be replaced by ATVs, electric bicycles, or other small, maneuverable vehicles at a fraction of the cost with little, if any, impact on crowd control effectiveness. This is a practical, cost-effective change that is a necessary step towards more proactive community safety measures.

I would like to thank the Board Office for their time in reviewing my submission and the countless others from concerned Toronto citizens. This consultation is a resource intensive undertaking, and if it is to amount to anything the public must see visible changes come from it. I urge you again to implement a POPRC that directly engages members of the public in police accountability measures. And furthermore, to take immediate action on the reallocation of funds away from niche and reactive policing strategies and towards more proactive and community-oriented ones.

Sincerely,

David Harding