

Dec 15, 2021

I am writing to share my concerns about the Toronto Police Service's Use Of New Artificial Intelligence Technologies Draft Policy.

First and foremost, it should be noted that any new investment in expensive technology is a clear rejection of public calls for smaller police budgets. Rejecting these calls, made overwhelmingly by Black, Indigenous, and otherwise marginalized groups, community stakeholders, and related experts in fields of poverty and crime, indicates the TPS are unwilling to listen to the communities they allegedly serve. This move towards more surveillance and the drain on the public purse it requires is contradictory to not just the continued advice and guidance of policy experts on community safety and the causes of crime, but also rejects the voices of the very community members the TPS is paid to "serve and protect" - and this unwillingness to listen to key stakeholders and move in the exact opposite direction of what is being asked for should be noted as such.

Second, TPS has shown time and again an unwillingness to comply with basic levels of accountability - even when investigations by the SIU are conducted, officers routinely refuse to hand over notes or comply with basic enquiries into public safety and professional conduct. Current technology - body cams, dash cams, drones - is routinely used to collect information on vulnerable persons, to target citizens involved in lawful actions such as protests and rallies, and to assist the police in criminalizing the community members they are supposed to be protecting. In instances where crimes are actually being committed, the technology does not prevent such crimes from taking place but simply records them. When the officers are the ones committing the crimes, cameras get turned off or "stop working" or even when footage is captured, there is still no accountability - so why invest in more technology that seems to be serving no one but the institution itself? The bar is already set low for public accountability and professional standards and giving the TPS even more tools with which the public has little to no say and for which officers and the force as a whole are held to no discernible standard is deeply concerning.

Third, while this consultation is a welcome means to help combat this lack of accountability, this process does not seem to actually welcome meaningful feedback, and the references to ongoing consultation within the draft are vague and worrisome. Within the draft policy, the process of consultation remains internal with decisions made by the Chief or with the Board. Where the public is included the wording is

vague, ie - "To the greatest degree possible, the Board must conduct such reviews in public." Cameras are already an ineffective means of making communities more safe - as previously mentioned, the root causes of crime (poverty, lack of opportunity, and unequal distribution of power) remain unaffected and when crime does happen it simply is recorded - not prevented. The communities who are most heavily policed are asking the TPS to stop surveilling them and for tax dollars to go towards community supports (housing, mental health, employment, education, food security). I know that key stakeholders keep making this clear to the TPS and yet how do these demands not get counted when it comes to consultation. How does the draft policy even get written and AI even get brought to the table when people are already asking for less? Fourth, cameras are already an ineffective means of increasing community safety, AI is a minefield. A true critical examination of AI technologies cannot include as the policy currently permits, decisions made internally with the possibility of external participation. Any implementation of AI technologies puts all of our privacy at stake and as such, this needs to require mandatory consultation of external stakeholders who are not a part of our affiliated with the TPS. This includes public involvement in determining the allowability of new AI technologies in the field and if they should be used at all.

As previously outlined, I do not believe they should. And with more public input, I believe the TPS would find that citizens are overwhelmingly not in favour of expanding police powers, certainly not those with I only became aware of this current consultation through community outreach - I had no other knowledge of this and given the wide-ranging implications of this policy for both vulnerable populations and the citizenry as a whole I feel the entire process has been made purposefully opaque. The timelines for responses are too short, the draft itself is overly confusing, and most importantly - the average person does not know this is underway. That is not meaningful consultation by any stretch of the imagination and that unto itself indicates an unwillingness by the TPS to meaningfully engage and an unwillingness to be held to a higher standard. Such conditions plus the increased powers of expansive AI technology make this new policy ripe for abuse of citizen rights and I am not in favour of this policy for all of these reasons.