

Dr. Dubi Kanengisser,  
c/o Toronto Police Services Board  
40 College St.  
Toronto ON M5G 2J3

Dear Dr. Kanengisser:

Re: Consultation on the Toronto Police Service Board's Use of Artificial Intelligence Technologies Policy

Thank you for letting the public write to you about the Use of Artificial Intelligence Technologies Policy by Toronto Police Service. I am a computer scientist working in Toronto in a research team to build the next generation federated learning system for genomics.

I write to you a little confused because while I appreciate the effort to have a public policy regarding these tools, it is unclear in the draft as it is a plethora of items that are missing key details. I understand this is a draft but it needs further elaboration. I am listing some here --

Page 2 - No current legislation fully regulates ...

If there is no current legislation to regulate this, how can any grievance with these tools and the department's unwarranted use of these tools be provided meaningfully? In this case, isn't it better to place a moratorium on such tools until there is a legislation that provides more guidelines to the department?

Page 2 - evidence-based evaluation ...

The document does not cite what is meant by evidence-based here. What kind of evidence is considered and by whom? How is the evidence collected?

Page 3 - new data that is substantially different from the data previously used.

The document does not say what constitutes this difference or similarity between the data sets.

Page 4 - experts and stakeholders ...

The document does not state who are the experts and stakeholders and how they are chosen? This definition is critical. What kind of representation do I or anyone in the city have?

Page 4 - part 1. (c) i. 3. ... public or Service members ...

Who takes precedence if the risk is identical to both and a decision has to be made?

Page 5 - part 1. (c) i. 4. ...is likely to cause harm or have an impact...

How do we know that it will likely cause harm? The review window is five years which is substantially large given how much data can be collected within five years and what kind of harm can go unnoticed.

Page 5 - part 1. (d) ...appropriate tools ...

The document does not cite which tools and how will the tools decided?

Page 6 - part 2. ... public on Service's website.

The document does not explain how often will it be updated and how soon after any incident?

Page 6 - part 5

Will these results and decisions be posted on the website, especially “how the service intends to use the AI technology?”

Page 7 - part 5 (n) ... its intended goal and ...

Will these results and decisions be posted on the website? How soon?

Lastly, the time frame of 2024, and review in 5 years is a much longer duration for this kind of technology. In my opinion, the expanse of these tools is large and thus the evaluation must be every quarter or so.

I would also like to point out that the data collection standard has to be established beforehand. What attributes will be collected and why are they necessary are the least possible points one can explain at least a quarter before the collection starts. A good possibility is to publish differentially private data only for reviewers and assessors who can vouch that the depart is not collecting more than needed. This is also important to reveal and keep in check how much are the marginalized and racialized communities targets of such surveillance.

Thank you.

Yours sincerely,  
Amanjeev Sethi