Good day, I am writing to share my thoughts about the Toronto Police Service's Use of New Artificial Intelligence Technologies Draft policy. Thank you for the opportunity to provide consultation. Within the policy I am concerned about the risk of bias associated with the AI technologies that are proposed to be implemented by the policy. As the policy outlines:

"there have been instances in which novel technologies were shown to incorporate and perpetuate preexisting and systemic biases, resulting in both individually and systemically discriminating decisions"

Although this is recognized within the guiding principles section of the policy, and the policy suggests that it will take steps to ensure "new technologies do not introduce or perpetuate biases, including biases against vulnerable populations such as people with disabilities, children and older persons, Indigenous, Black and racialized communities, low-income and LGBTQ2+ communities",I feel the policy does an inadequate job of outlining this. Specifically I feel the policy does an inadequate job of: 1) identifying the multiple ways that the bias may manifest with the use of AI technologies; and 2) outlining the safeguards for minimizing bias at all levels it can be introduced; and 3) outlining how the Toronto Police Service will be held accountable for inevitable harm that comes from the use of technology.

As is identified by DeCamp and Lindvall (2020) in their research paper on the latent bias of artificial intelligence models, there are multiple levels at which bias can be introduced:

1. The AI technology/algorithm itself
   Bias can be directly written into algorithms
2. Adaptive learning
   AI models that "learn/change" can become biased over time, particularly if they learn from pervasive, ongoing and uncorrected bias within the broader policing system
3. The interaction between AI and real world contexts
   Information from AI models inevitably has to be interpreted by people to guide decision making. How information from AI is interpreted and used in real life context by the Toronto police service may also be subject to bias.
4. The purpose and use of AI
   Bias can be introduced if the outcomes of interests/problems chosen to be solve do not match the interests/goals of the community of people for which an organization serves.

Given the legacy of systemic racism in policing in Canada (see the Report of the Standing Committee on public Safety and National Security), extreme caution needs to be taken when introducing technology like AI that has the risk of further perpetuating these systemic biases. How the Toronto Police Service address bias at ALL of these levels, outlined above, should be more concretely addressed within the policy, rather than briefly addressing that this is one of the roles/responsibilities of the Board. It may also require a re-assessment of the risk categories outlined, for example are there truly AI technologies that are "minimal risk"?

In addition I have concerns at how much of the responsibility of assessing/mitigating bias is in the hands on an internal bodies—the Board/the Chief. Critical analysis of AI technologies and their biases, requires external stakeholders who are not employed by the Toronto Police Service. Currently there are only vague references within the policy to developing 1. "a public engagement strategy", 2. " a method for members of the public to submit concerns". I recognize a draft policy might not be the appropriate venue for outlining the full public engagement strategy, but as it stands the policy for me reflects a passive approach

to public engagement—the public will transparently be informed about and be able to submit concerns. Community members/external consultants need to be involved in all levels decision making around the use of AI technology—not just after it the technology has been implemented/used. I feel this should be mandated within the policy. This should include mandatory public consultation on which technologies are chosen, what technologies are used for, what the risk associated with each technology is, continuous review of the use of AI technology, and public involvement in how the Toronto police Service is held accountable to any harms created by AI.

Thank you for your time and consideration.