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**Submissions of Canadian Race Relations Foundation in relation to  
Human Rights and Police Governance**

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February 20, 2024

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## I. OVERVIEW

The Canadian Race Relations Foundation (the “CRRF”) is a Crown corporation committed to achieving the elimination of racism and all forms of racial discrimination in Canada. The CRRF has been fighting for racial justice for a quarter-century and has assisted several organizations and institutions in working towards the elimination of racism.<sup>1</sup>

The CRRF has been asked by the Peel Police Services Board (the “Board”) to provide insights on the core issues of police governance and human rights in Peel Region. The CRRF has conducted extensive research and has found that racialized communities in Peel continue to face human rights issues at the hands of Peel Regional Police (“PRP”). For one, recent data released by PRP, shows that use of force incidents for a majority of racialized groups in Peel has increased.<sup>2</sup> Further, as seen through documented accounts from the last 20 years, racial profiling continues to be a pressing issue in Peel. These experiences of racial discrimination undermine public confidence in policing and community trust. To meaningfully respond to these concerns, the CRRF suggests PRP adopts an approach that is community-led, data-driven, and accountability-focused. Specifically, the CRRF recommends PRP: approaches community engagement in a historically sensitive manner consistent with the desires of the specific community, adopts a community-focused approach to racial bias training, and enhances its current accountability measures by implementing strategies that target individual police officers and the broader policing institution.

## II. THE PROBLEM: ONGOING HUMAN RIGHTS ISSUES FACING RACIALIZED COMMUNITIES IN PEEL REGION

In November 2020, the Peel Regional Police and the Peel Police Services Board signed a memorandum of understanding with the Ontario Human Rights Commission (“OHRC”), indicating their legally binding commitment to eliminate discriminatory practices in policing and restore trust with Black, Indigenous, and racialized communities.<sup>3</sup> This agreement led to the development of the *Human Rights Project*. A joint endeavour between PRP, the Board, and the OHRC, “to examine and address existing and longstanding discriminatory practices within the service.”<sup>4</sup>

In an attempt to address systemic racism in policing, Peel has committed to seven key principles, put forth by OHRC’s policy on eliminating racial profiling in law enforcement.

### 1. Acknowledgment

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<sup>1</sup> Canadian Race Relations Foundation, Annual Report 2022-2023, (Last accessed February 15, 2023), online: <https://crrf-fcrr.ca/annual-reports-financial-statements/>

<sup>2</sup> PRP, Committed to Action Progress Report: Human Rights Project & Use of Force. 2023. at Figure 1 Online: <https://www.peelpolice.ca/en/who-we-are/resources/Documents/OHRP/PRP-ProgressReport-HRP-Sept15-REV21-accessible.pdf>

<sup>3</sup> Ontario Human Rights Commission, *Memorandum of Understanding*, (2020), online: <https://www.ohrc.on.ca/en/memorandum-understanding-between-ontario-human-rights-commission-and-peel-regional-police-and#overlay-context=en>

<sup>4</sup> PRP, Committed to Action Progress Report: Human Rights Project & Use of Force. 2023. at Figure 1 Online: <https://www.peelpolice.ca/en/who-we-are/resources/Documents/OHRP/PRP-ProgressReport-HRP-Sept15-REV21-accessible.pdf>

2. Engagement
3. Policy Guidance
4. Monitoring and accountability
5. Organizational change
6. Data collection
7. Multi-year action plan<sup>5</sup>

The CRRF acknowledges that PRP has taken a significant step in their joint efforts with the Board, and the Ontario Human Rights Commission to commit to addressing racism in policing. Despite this commitment, discriminatory practices within policing persist, signalling the need for a different approach. Data shows that there remains considerable room for improvement given that use of force incidents among many racialized communities in Peel Region have increased over time. Also of concern is the persistence of racial profiling, a practice that has been forcefully denounced by all courts of law in Canada.

## 1. CONCERNING TRENDS IN USE OF FORCE INCIDENTS

Members of Peel Region’s Black and racialized communities remain over-represented in police use of force incidents at troubling rates. In 2023, PRP released a report titled “Committed to Action Progress Report: Human Rights and Use of Force.”<sup>6</sup> The purpose of the report was to show PRP’s progress in its work towards addressing systemic racism in policing.<sup>7</sup> The report provides an analysis of race and identity-based data collected between January 1 – December 31, 2022, and compares this data to 2020 and 2021.

The progress report illustrates that despite a concerted effort by PRP to address systemic racism in policing, members of Peel Region’s Black community continue to be over-represented in use of force involving police. Despite only making up 9.8% of the residential population, incidents involving Black people made up 34.3% of all use of force incidents in 2022. Not only is this an over-representation at a rate of 3.5 times the residential population, it represents a 3.1% increase since 2020.<sup>8</sup> Moreover, this data is particularly alarming given that overall use of force incidents have declined over time. In 2020 there were 853 reported use of force reports, while 695 were reported in 2022.<sup>9</sup> Thus, despite a decrease in overall incidents, there is an increase in the percentage of Black representation among these incidents.

Other racialized groups are also overrepresented in PRP use of force incidents. Indeed—setting aside changes to data on use of force involving East/Southeast Asian and South Asian people,

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<sup>5</sup> Ontario Human Rights Commission, *Memorandum of Understanding*, (2020), online: <https://www.ohrc.on.ca/en/memorandum-understanding-between-ontario-human-rights-commission-and-peel-regional-police-and#overlay-context=en>

<sup>6</sup> PRP, *Committed to Action Progress Report: Human Rights Project & Use of Force*. 2023, at p. 3 Online: <https://www.peelpolice.ca/en/who-we-are/resources/Documents/OHRP/PRP-ProgressReport-HRP-Sept15-REV21-accessible.pdf>

<sup>7</sup> *Ibid.*

<sup>8</sup> *Ibid.*, at p. 22.

<sup>9</sup> *Ibid.*, at p. 15.

which the report indicates may reflect a change in racial classification practices by officers, rather than changes in the race of use of force subjects<sup>10</sup>—the number or use of force incidents for all other racialized groups increased over time:

- Incidents involving people whose race was classified as Middle Eastern increased by 51.85% from 2020 to 2022;
- Incidents involving people whose race was classified as Latino increased by 75% from 2020 to 2022; and
- Incidents involving people whose race was classified as Indigenous increased by 100% from 2020 to 2022 (from 3 incidents to 6).<sup>11</sup>

The only racial group for which the report shows a clear decrease in use of force incident over time is White.<sup>12</sup> The data reported on in the Committed to Action Progress Report also illustrates that 12% of all use of force incidents in 2022 involved people in crisis, a uniquely vulnerable population group.<sup>13</sup>

## 2. THE PERSISTENCE OF RACIAL PROFILING IN PEEL REGION

Racial profiling has been, and continues to be, an issue of significant concern in Peel Region. There are several, recent and publicly available examples of cases where a court or a tribunal has found that a person's race played a role in a harmful or humiliating experience of a civilian in an encounter with a member of the Peel Regional Police. Some examples include:

- In 2007, the Human Rights Tribunal found that Ms. Nassiah, a Black woman, was subjected to a more intensive and prolonged investigation in 2003, because of her race in a shop-lifting case that had a weak foundation<sup>14</sup>
- In 2016, Peel police officers handcuffed a 6-year-old Black girl on her wrists and ankles and held her down, on her stomach with her hands behind her back, for 28 minutes. In 2020 the Human Rights Tribunal of Ontario found that Peel police officers' conduct was due to the girl being Black.<sup>15</sup>
- In 2022, a judge found that a 2020 traffic stop was motivated by racial profiling by Peel police and dismissed the charges.<sup>16</sup>
- In 2023, another judge found that a traffic stop that occurred in 2020 was motivated by racial profiling.<sup>17</sup>

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<sup>10</sup> *Ibid.*, at p. 21.

<sup>11</sup> *Ibid.*

<sup>12</sup> *Ibid.*

<sup>13</sup> *Ibid.*, at p. 16.

<sup>14</sup> *Nassiah v. Peel (Regional Municipality) Services Board*, [2007 HRTO 14](#) at paras. 2, 166.

<sup>15</sup> *JKB v. Regional Municipality of Peel Police Services Board*, [2020 HRTO 1040](#), at para. 7.

<sup>16</sup> Alexandra Heck, Judge tosses case after finding Brampton traffic stop 'infected by racial profiling', (April 14, 2022), Online: [https://www.bramptonguardian.com/news/judge-tosses-case-after-finding-brampton-traffic-stop-infected-by-racial-profiling/article\\_804590c6-c23a-5d5e-a3c7-6d327a6049da.html](https://www.bramptonguardian.com/news/judge-tosses-case-after-finding-brampton-traffic-stop-infected-by-racial-profiling/article_804590c6-c23a-5d5e-a3c7-6d327a6049da.html)

<sup>17</sup> *R. v. Gala-Nyam*, 2023 ONSC 2241.

Incidents of racial profiling, particularly those that result in media coverage, publicized litigation and scathing judicial findings, shock the conscience of the public. These occurrences erode the public’s trust in policing. Re-establishing that trust will require more than just the implementation of a robust anti-racism training program. It will require the adoption of accountability measures that impose significant and serious consequences on the worst offenders—officers whose conduct is racially motivated have no place in the community.

### **III. THE SOLUTION: COMMUNITY-LED, DATA-DRIVEN, ACCOUNTABILITY-FOCUSED REFORMS**

#### **1. REJECT A ONE-SIZE-FITS-ALL APPROACH TO ENGAGING WITH RACIALIZED COMMUNITIES**

PRP must adopt an approach to priority and racialized communities that is flexible and community-directed, one that recognizes that while an increased police presence creates a sense of safety for some, this is not the case for others. In line with its commitment to acknowledge the impact that historic and ongoing racial profiling “has on individual and community well-being and trust in law enforcement,”<sup>18</sup> PRP must acknowledge that safety for some marginalized communities includes safety from the police and, where appropriate, develop *disengagement* rather than *engagement* strategies in relation to certain populations.

A nuanced understanding of the impact of racism in policing on community members’ sense of safety has yet to be integrated into PRP’s approach to combatting systemic racism. PRP’s 2020-2023 strategic plan appears to operate under the assumption that an increase in police presence in “priority populations” is universally beneficial and desirable for the promotion of public safety. The strategic plan identifies goals to:

- Develop processes for identifying priority populations and implement and evaluate initiatives designed to support communities;
- Establish opportunities for consultation and engagement to provide the community a voice to improve outcomes for priority populations.<sup>19</sup>

Priority populations are identified as “community members in Peel Region who have been identified as having high-risk levels for social disorder or crime, as either victims or offenders.”<sup>20</sup> This definition, as well as the engagement strategies that flow from it, however, fail to recognize the role that the historic over-policing of certain communities, namely Black communities, has

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<sup>18</sup> PRP, Committed to Action Progress Report: Human Rights Project & Use of Force. 2023. at Figure 1 Online: <https://www.peelpolice.ca/en/who-we-are/resources/Documents/OHRP/PRP-ProgressReport-HRP-Sept15-REV21-accessible.pdf>

<sup>19</sup> Peel Regional Police, *2020-2023 Strategic Plan*, (Last visited February 13, 2024), Online: <https://www.peelpolice.ca/en/who-we-are/strategic-plan.aspx>.

<sup>20</sup> Peel Regional Police, *Our Community*, (Last visited February 15, 2024), Online: <https://www.peelpolice.ca/en/who-we-are/our-community-2021.aspx#Situation-Table-Launch>.

played in the creation and maintenance of the vulnerability that cause these communities to not be designated as “priority”.

Black and other racialized communities are subject to a disproportionate amount of policing.<sup>21</sup> While the objective of policing is to serve and protect, the reality among visible minorities and racialized communities is that police presence often instills fear, trauma, and humiliation.<sup>22</sup> In 2019, the Supreme Court of Canada in *R v Le*, recognized that over-policing impacts racial minorities abilities to pursue employment and education opportunities, excludes them socially, and perpetuates criminalization.<sup>23</sup> Further, racial discrimination in policing causes long term effects including post-traumatic stress disorder, perceptions of race-related threats, and a lack of engagement with community resources.<sup>24</sup> It compromises the future of those it victimizes and creates mistrust in institutions.<sup>25</sup>

Acknowledging over-policing as a factor that contributes to negative community outcomes necessarily means recognizing community *disengagement* as a potential tool for enhancing community safety.

The decision to remove police officers from schools and to cancel the School Resources Officer (“SRO”) program in Peel Region in 2020 represents an example of how *disengagement* may successfully be used as a strategy to enhance a community’s sense of safety. The SRO was a program that, at the time of its dissolution, had operated for 20 years. In 2020, following consultations with community members, PRP recognized that the program, which brought police officers into schools, caused fear among community members and negatively impacted Black and other visible minority students.<sup>26</sup>

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<sup>21</sup> *R v Le*, 2019 SCC 34 at para 97.

<sup>22</sup> Ontario Human Rights Commission, *A Collective Impact: Interim report on the inquiry into racial profiling and racial discrimination of Black persons by the Toronto Police Service*, (2018) at p. 25, online: <https://www.ohrc.on.ca/en/impact-action-final-report-anti-black-racism-toronto-police-service>

<sup>23</sup> *R v Le*, 2019 SCC 34 at para 94.

<sup>24</sup> Ontario Human Rights Commission, Inquiry Report, *Paying the Price: The Human Cost of Racial Profiling* (2003), at p. 17.

Online: [http://www.ohrc.on.ca/sites/default/files/attachments/Paying\\_the\\_price%3A\\_The\\_human\\_cost\\_of\\_racial\\_profiling.pdf](http://www.ohrc.on.ca/sites/default/files/attachments/Paying_the_price%3A_The_human_cost_of_racial_profiling.pdf).

<sup>25</sup> Ontario Human Rights Commission, Inquiry Report, *Paying the Price: The Human Cost of Racial Profiling* (2003), at p. 53.

Online: [http://www.ohrc.on.ca/sites/default/files/attachments/Paying\\_the\\_price%3A\\_The\\_human\\_cost\\_of\\_racial\\_profiling.pdf](http://www.ohrc.on.ca/sites/default/files/attachments/Paying_the_price%3A_The_human_cost_of_racial_profiling.pdf).

<sup>26</sup> Joel Wittnebel, ‘Change was necessary’ Peel police scraps school resource officer program, acknowledges harm to racialized students, (November 19, 2020), Online: <https://thepointer.com/article/2020-11-19/change-was-necessary-peel-police-scraps-school-officer-program-acknowledges-harms-to-racialized-students> ; Denise Pagnilawan, Peel police end school resource officer program, cite negative impact on students, (November 19, 2020) online: <https://nationalpost.com/pmnn/news-pmnn/canada-news-pmnn/peel-police-end-school-resource-officer-program-cite-negative-impact-on-students>.

In its decision to withdraw its officers from schools and terminate the SRO program, the PRP acknowledged the reality of systemic racism and the disproportionate punitive effects that police presence can produce for some racialized groups.<sup>27</sup>

**RECOMMENDATIONS:**

- PRP should adopt an approach to “priority populations” that recognizes the historic harms of racism and over-policing, especially among Black communities, and develop a strategy of *disengagement* for those communities.
- Mandate annual reporting to the Board outlining community responses to engagement/disengagement strategies.

**2. ADOPT A COMMUNITY-FOCUSED APPROACH TO RACIAL BIAS TRAINING**

Accountability requires mechanisms that demonstrate a commitment to change not only at the institutional level, but at the individual officer level as well, by ensuring that racial bias training is a meaningful experience rather than a box-checking exercise.

The Board may consider adopting an immersion-style training experience, like the one currently being used in Montreal to assist officer engagement with communities. As of August 2023, Montreal has implemented immersion training, whereby new recruits spend five weeks, unarmed and without a uniform, in host communities, to “experience their reality with them.”<sup>28</sup> The purpose of the program is to prepare officers to better interact with communities that may be different than their own.<sup>29</sup> It also allows the host to control the manner in which they have police interaction, thereby working towards building trust. The Board should implement immersion training for all new recruits in PRP. The Board should request community feedback regarding officer participation and sentiments about the success of the immersion training. The feedback should be reported at regular intervals.

**RECOMMENDATIONS:**

- PRP should consider implementing immersion-style training to allow officers and recruits to gain a meaningful understanding of the experience of racialized communities.

<sup>27</sup> Peel Regional Police, *UPDATE: Dissolution of the School Resource Officer (SRO) Program*, (November 18, 2020). Online: <https://www.peelpolice.ca/Modules/News/index.aspx?feedId=d6aa0ab4-eb5f-4b5e-a251-0e833d984d68&newsId=270c81ed-37eb-43df-93e9-b7d6ad47f1bf>

<sup>28</sup>SPVM, Police Integration Program - Immersion Mtl, (Last accessed: February 16, 2024), online: <https://recrutementspvm.ca/en/police-integration-program-immersion-mtl/>

<sup>29</sup> SPVM, Police Integration Program - Immersion Mtl, (Last accessed: February 16, 2024), online: <https://recrutementspvm.ca/en/police-integration-program-immersion-mtl/>



- Annual reporting to the Board both from the perspective of officers and the community should be mandated.

### 3. IMPLEMENT DATA-DRIVEN INDIVIDUAL & INSTITUTIONAL ACCOUNTABILITY MEASURES

The United Nations has recognized there are four aspects that must be present for a police accountability system to be effective:

1. A system in which police, the State, the public and independent bodies are represented
2. A system involving monitoring before, during and after police operations and actions
3. A system allowing for corrective action
4. A system that targets individual police officers, their supervisors and the institution as a whole.<sup>30</sup>

From this perspective, the CRRF recommends that accountability measures targets both individual police officers and the policing institution as a whole. This can be achieved in Peel Region. PRP has committed to “[r]egularly monitor racial profiling, and set robust internal accountability mechanisms at the governance, management and operational levels.”<sup>31</sup> As such, PRP has undertaken the following:

- In an effort to increase transparency, accountability and strengthen our commitment to a bias-free service delivery, PRP updated Directive I-B-173 (F) on Body Worn Cameras that requires the addition of a supervisor to review body worn camera footage when a use of force incident has occurred. This is to monitor for appropriate conduct by the officer and ensure compliance with our training and directives.
- Performance Management: In 2022, the annual performance review process for all sworn members was updated to include an officers’ use of force reports for compliance with our directives<sup>32</sup>

Despite these steps forward, there remain a number of data-driven methods of promoting accountability that have either remained unexplored by the PRP or that have been resisted.

#### a. Data-driven Reviews to Promote Individual Accountability

Accountability is central to restoring the trust many racialized communities have lost in policing. Accountability requires mechanisms that demonstrate a commitment to change not only at the

<sup>30</sup>United Nations, *Handbook on police accountability, oversight and integrity*, (New York: United Nations Publication, 2011) online:

[https://www.unodc.org/pdf/criminal\\_justice/Handbook\\_on\\_police\\_Accountability\\_Oversight\\_and\\_Integrity.pdf](https://www.unodc.org/pdf/criminal_justice/Handbook_on_police_Accountability_Oversight_and_Integrity.pdf)

<sup>31</sup> Ontario Human Rights Commission, *Memorandum of Understanding*, (2020), online:

<https://www.ohrc.on.ca/en/memorandum-understanding-between-ontario-human-rights-commission-and-peel-regional-police-and#overlay-context=en>

<sup>32</sup> Peel Regional Police, *Committed to Action Progress Report: Human Rights Project & Use of Force*, (2023), Online: <https://www.peelpolice.ca/en/who-we-are/resources/Documents/OHRP/PRP-ProgressReport-HRP-Sept15-REV21-accessible.pdf>

institutional level, but at the individual officer level as well. To date, officer accountability has relied largely on complaints from members of the community who have been impacted by an officer's racially motivated conduct. A system that relies on complaints is insufficient to provide true accountability. Many people are deterred from filing complaints based on fear of retaliation, lack of information and accessibility, the sheer time and effort it takes for a complaint to make its way through the system, the emotional, mental and financial burden associated with challenging wrongful state conduct and a mistrust of the formal system for making complaints.

Rather than relying on public complaints to trigger a performance review of individual officers, we recommend that automatic reviews should be triggered based on data collected during officer encounters with community members. For example, an officer who has a higher proportion of stops or arrests where the subjects belong to certain racial communities would be automatically subjected to a performance review rather than waiting for a complaint from the community to initiate the review. PRP needs to internally and proactively identify and address the conduct of officers that have been found to have violated someone's human rights, breached a *Charter* right, engaged in misuse of force, and/or engaged in racial profiling.

In many ways, the PRP already has tools at their disposal which can be used to enhance accountability of individual officers. Currently, PRP uses IAPro, an early warning system disciplinary tracking system "capable of identifying members exhibiting specific performance issues which could be indicators of larger behavioral or conduct problems."<sup>33</sup> In response to recommendations by OHRC, PRP has indicated it will include Charter breaches in IAPro.<sup>34</sup> PRP should also include unauthorized street checks, human rights violations, and complaints of racial profiling and discrimination, as an indicator that intervention is required. Currently PRP has indicated it will not use race-based data in evaluating individual officer performance.<sup>35</sup> This is a missed opportunity to enhance accountability to the public. Race based data should be used in a way to monitor officers who may be engaging in racial profiling and racial discrimination, and officers who have increased reports of use of force. When an officer is found to have a propensity for this conduct, the officer should undergo extensive racial discrimination training by an expert in this field, and/or face disciplinary and professional consequences, and have their conduct monitored by the Board.

In 2020, Statistics Canada, and the Canadian Association of Chiefs of Police (CACP) announced their commitment to working on the collection of data on the Indigenous and racialized identity of all victims and accused persons in criminal incidents through the Uniform Crime Reporting (UCR)

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<sup>33</sup> RCMP, Early warning: Integrated Risk Management Program using IAPro, (June 14, 2016). Online: <https://www.rcmp-grc.gc.ca/en/early-warning-integrated-risk-management-program-using-iapro>

<sup>34</sup>Ontario Human Rights Commission, *Work plan to eliminate racial profiling and racial discrimination between the Peel Regional Police, Peel Police Services Board and the Ontario Human Rights Commission*, (last visited February 13, 2024), Online: <https://www.peel.police.ca/en/who-we-are/resources/Documents/OHRP/OHRC-Recommendations-22-June-2023v2-accessible.pdf>

<sup>35</sup>Ontario Human Rights Commission, *Work plan to eliminate racial profiling and racial discrimination between the Peel Regional Police, Peel Police Services Board and the Ontario Human Rights Commission*, (last visited February 13, 2024), p. 37. Online: <https://www.peel.police.ca/en/who-we-are/resources/Documents/OHRP/OHRC-Recommendations-22-June-2023v2-accessible.pdf>

Survey.<sup>36</sup> Once this platform is available to Peel Regional Police, it represents yet another source of data that can be used not only to provide a general picture to report and review on progress in the aggregate, but also to modify the behaviour of particularly officers.

Additionally, given that 12% of all use of force incidents involve people in crisis, the use of other databases like the Vulnerable Persons Registry<sup>37</sup> should be the subject of training and monitoring to ensure that use of force incidents are minimized in mental health response. PRP has a Vulnerable Person Registry (“Registry”) that contains information on people with a medical, mental health, or physical condition that may exhibit behaviour that may pose a danger to themselves.<sup>38</sup> The purpose of the Registry is to assist police and emergency services in responding to a vulnerable person during a crisis.<sup>39</sup> The registry contains sensitive information that can be provided by the caregiver or parent of a vulnerable person.<sup>40</sup>

In some instances, police are first to respond to a mental health crisis.<sup>41</sup> Considering this, ongoing mental health training provided by an expert, should be required for all officers. The goal of the training would be to ensure PRP officers are able to respond to someone in crisis without using force, until additional service providers arrive. Further, due to the inherent privacy concerns of this information, it should only be used in strict circumstances. The Board should provide ongoing reporting of how frequently the Registry is used by PRP, in what instances, and the outcomes.

#### **RECOMMENDATIONS:**

- PRP should implement data-driven performance reviews of individual officers to tailor specific training based on officer need.
- PRP should expand the information captured in “IA Pro” to include unauthorized street checks, and complaints of racial discrimination and human rights violations and have targeted response to instances of racism.

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<sup>36</sup> Statistics Canada, *Police-Reported Indigenous and Racialized Identity Data Collection through the Uniform Crime Reporting Survey*.

<sup>37</sup> Peel Regional Police, *Vulnerable Persons Registry*, (last visited February 20, 2024), Online: <https://www.peelpolice.ca/en/services/vulnerable-persons-registry.aspx>.

<sup>38</sup> Peel Regional Police, *Vulnerable Person Registry*, (Last accessed February, 16, 2024) online: <https://www.peelpolice.ca/en/services/vulnerable-persons-registry.aspx>; and Peel Regional Police, *Vulnerable Person Registry Fact Sheet*, (Last accessed: February 16, 2024) online: <https://co-ophousingpeel-halton.coop/wp-content/uploads/2014/10/Vulnerable-Person-Registry-Fact-Sheet-20140227.pdf>

<sup>39</sup> Peel Regional Police, *Vulnerable Person Registry*, (Last accessed February, 16, 2024) online: <https://www.peelpolice.ca/en/services/vulnerable-persons-registry.aspx>

<sup>40</sup> Peel Regional Police, *Vulnerable Person Registry*, (Last accessed February, 16, 2024) online: <https://www.peelpolice.ca/en/services/vulnerable-persons-registry.aspx>

<sup>41</sup> Ontario Human Rights Commission, *Work plan to eliminate racial profiling and racial discrimination between the Peel Regional Police, Peel Police Services Board and the Ontario Human Rights Commission*, (last visited February 13, 2024), at p. 4, online: <https://www.peelpolice.ca/en/who-we-are/resources/Documents/OHRP/OHRC-Recommendations-22-June-2023v2-accessible.pdf>

- The Board should track complaints to identify officers who are the subject of multiple charter and human rights violations, and officers who are the subject of multiple race-based complaints.
- In any instance where a Court finds an officer purposefully lied, breached a charter right, or engaged in excessive use of force, PRP should investigate the matter even without a public complaint.
- To enhance accountability, the Board should receive an annual report on the use of these databases and measure taken in response to identified thresholds.
- The Board be provided with ongoing reporting of how frequently the Vulnerable Person Registry is used by PRP, in what instances, and the outcomes related to such use.

#### **b. An Annual Review by a Panel of Experts**

The board has the authority to enhance institutional as well as individual police accountability through regular data collection, review and reporting. Peel Police Services Board is a civilian governing body of the police responsible for ensuring “the provision of effective police services, law enforcement and crime prevention... through the enactment of policies.”<sup>42</sup> The Board has three committees:

1. Human Resources
2. Governance and Human Rights
3. Finance

Part of the Human Rights and governance committees’ mandate is to (e) collaborate “with community groups, the Ontario Human Rights Commission, and regional and provincial governments to address systemic barriers and root causes of racial inequities and human rights violations in policing.”<sup>43</sup> To fulfill this mandate, the board should convene an ad hoc sub-committee composed of subject-matter experts who will be commissioned to do an annualized review of the Board’s various policies on the basis of the data collected. Their mandate should be to evaluate the race-disaggregated data and to make policy recommendations on the basis of their analysis.

The CRRF may be in a position to help financially support the hiring of this panel of experts.

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<sup>42</sup> Regional Municipality of Peel, *Board Mandate*, (2017), online: <https://www.peelpoliceboard.ca/en/who-we-are/board-mandate.aspx>

<sup>43</sup> Regional Municipality of Peel, *Board Committees*, (2017), online: [https://www.peelpoliceboard.ca/en/who-we-are/board-committees.aspx?\\_mid\\_=16101](https://www.peelpoliceboard.ca/en/who-we-are/board-committees.aspx?_mid_=16101)

**RECOMMENDATIONS:**

- PRP should retain a panel of experts who will examine the data collected the during the previous year, measure outcomes against acceptable standards and make evidence-based policy and practice recommendations.

**IV. CONCLUSION**

Racial discrimination is an ongoing problem in policing and has affected community trust in the police and the Police Services Board. To address this, PRP must commit to community-led, data-driven, accountability-focused reforms. Sincere and proactive efforts are necessary to rebuild trust in communities that have been subject to heightened scrutiny, racial profiling, and violence by the police. The recommendations above should be prioritized to place actions behind intentions.