

Race & Identity Based Data Collection Strategy:

An integral part of the Toronto Police Service's commitment to equity, transparency and accountability





The Race and Identity-Based Data Collection Strategy: An integral part of the Toronto Police Service's commitment to equity, transparency and accountability

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About this Report

This report provides a detailed picture of the Race and Identity-Based Data Collection Strategy (R.B.D.C. Strategy) to provide the reader with an understanding of the Strategy and its key aspects and elements.

The R.B.D.C. Strategy represents a complex Service-wide undertaking that employs a thoughtful and principled approach grounded in engagements with communities, Service members, subject matter experts, and key stakeholders. The R.B.D.C. Strategy includes developing action plans to enable systems and internal culture change as part of the Service's commitment to transparency and accountability.

This report is a reference document that guides a series of subsequent interaction-specific reports. Each report in the series will focus on a specific police interaction, translate the strategic approach outlined in this report to each interaction, and present the corresponding findings of data analysis. The principles and approach outlined here have been applied to use of force and strip searches, which make up Phase 1 of the R.B.D.C. Strategy. New reports will be included in the series as further police interactions are added to the Strategy.

Background

Systemic racial bias exists across all Canadian institutions, including law enforcement. Racialized communities have known this for a very long time, having directly experienced the overrepresentation in interactions with police and that race data has been used in ways that stigmatized communities.

Decades of reports from commissions, public inquiries, and numerous studies have raised concerns about the over-representation of Indigenous, Black, and racialized communities in the criminal justice system. Work to address this started long before the R.B.D.C. Strategy and we want to acknowledge the calls for action that have led us here today (**Figure 1**).

Not addressing systemic racism fails our communities. It erodes the public's trust and confidence in policing, which is essential to keeping our communities safe. The Toronto Police Services Board (Board) and the Service recognize the importance and urgency of this work. Over the last several years, we have been making progress to implement comprehensive police reform, including the Board's 81 Recommendations for Police Reform.

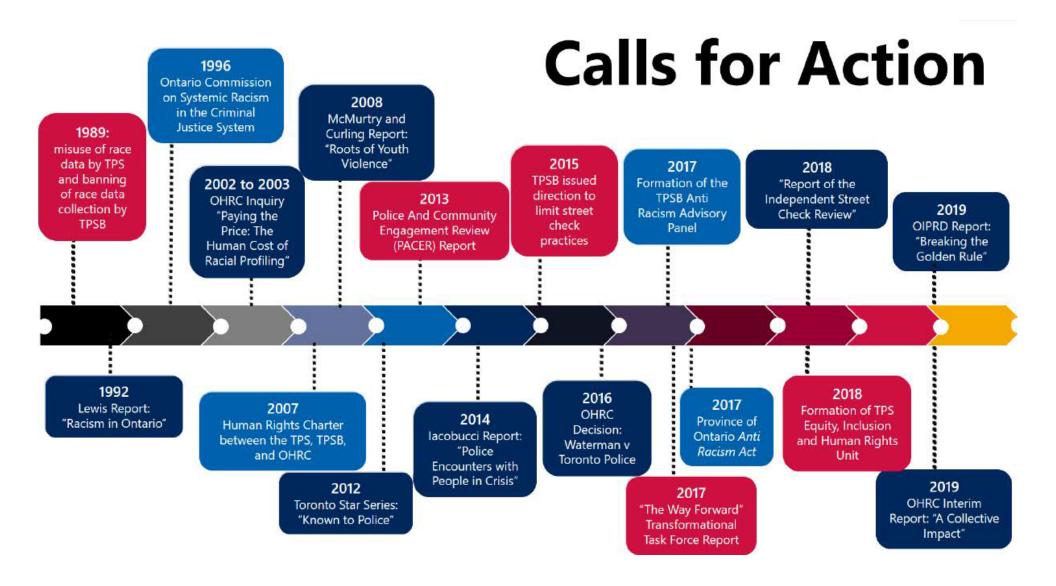


Figure 1: Timeline - Calls for Action



We made changes to understand the lived experiences of diverse communities, including through:

- Expanding alternate response models for people in crisis;
- Reviewing our training curriculum with academic and community partners and mandating training on Anti-Black Racism and the Indigenous Experience for all members to better support fair and unbiased service delivery;
- Implementing new models for alternative service delivery such as the Neighbourhood Community Officer Program;
- Equipping our officers with Body Worn Cameras;
- The formation of an Equity, Inclusion & Human Rights (E.I.H.R.) Unit to support the Service's modernization efforts and development of the Service-wide Equity Strategy.

R.B.D.C. Strategy: An Integral part of the Service's journey to equitable policing

The Service has been on a journey of transformation anchored in the principles of diversity, inclusion, equity, transparency, and fairness. This is part of our commitment to comprehensive police reform and internal culture change.

We are building these principles into all aspects of the Service to help repair community trust and commit to our members that the Service is a safe, bias-free, and inclusive place to work.

The R.B.D.C. Strategy represents a key part of the Service's commitment to equity, transparency, and accountability. Analyzing and reporting on race-based data is critical to achieve the Service's goal of eliminating racial bias and promoting fair and non-

discriminatory police services in Toronto.

At its meeting on September 19, 2019, the Board approved the Race-Based Data Collection, Analysis and Public Reporting Policy (Policy). Guided by the legal principles of the *Ontario Human Rights Code* and Ontario's *Anti-Racism Act* and grounded in a comprehensive process of consultations, the Policy is the expression of the collective expertise of the Anti-Racism Advisory Panel (A.R.A.P.), Service Members, subject matter experts, and community members with lived experiences. It aligns with Ontario's Data Standards for the Identification and Monitoring of Systemic Racism (also known as Ontario's Anti-Racism Data Standards). Established under s. 6(1) of the *Anti-Racism Act, 2017*, the Data Standards sets out a consistent approach to identify and monitor systemic racism and racial disparities within the public sector.

The policy states that its purpose is to use race-based data collection, analysis and public reporting to identify, monitor and eliminate potential systemic racism and racial bias; improve the delivery of police services; and enhance trend analysis, professional development and public. It is not intended to stigmatize communities, be used to identify Service members, or for disciplinary purposes.

With the Policy in place, the Service developed a comprehensive strategy to implement it. The R.B.D.C. Strategy represents a Service-

wide effort that brings together internal experts with operational police expertise and expertise in data management systems and data analysis with an equity lens, along with key stakeholders, academics, and community representatives with subject matter expertise in race data collection and analysis and lived experiences.

To properly address the complexity of the task and help the Service to test, learn and improve, the policy and R.B.D.C. Strategy takes a staged approach:

Phase 1 commenced in January 2020 with the collection of race perception data for Use of Force interactions as required by the Anti-Racism Act, 2017 and regulation. The Service went one step further and included Strip Searches in response to the Office of Independent Police Review Director's report entitled *Breaking the Golden Rule: A Review of the Police Strip Searches in Ontario*.

Phase 2 commenced in January 2021 to include arrests, charges, releases, apprehensions, and youth diversion data.

Detailed reports on findings for use of force and strip searches data analysis will open up the series of interaction-specific reports.

The reports of the R.B.D.C. Strategy can be accessed here:

https://www.tps.ca/race-based-data-collection/



What is Unique About the R.B.D.C. Strategy?

The complex and comprehensive work driven by the R.B.D.C. Strategy is supported by some unique tenets of this Strategy.

Strong leadership:

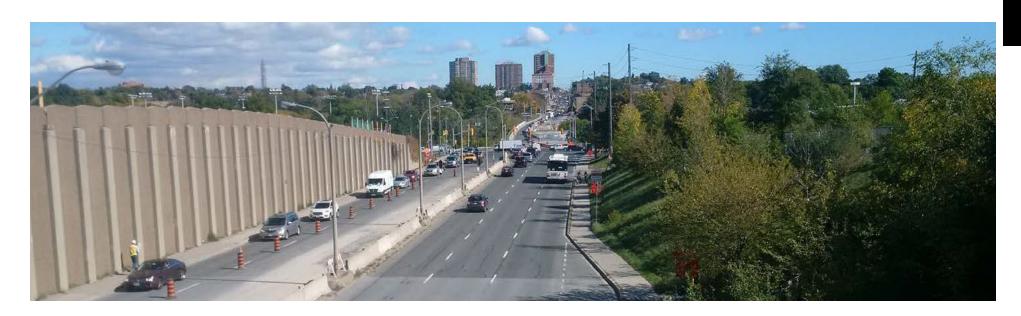
An All-Of-Command Governance structure demonstrates our commitment to race-based data efforts and to addressing systemic barriers. A Governance Committee provides leadership and direction to coordinate operations, dedicate resources, make decisions, and be accountable for all aspects of the Strategy. This Committee is cochaired by a Deputy Chief and the Chief Information Officer, with the Chief of Police being the Executive Sponsor of the Strategy. The Governance Committee consists of senior leaders from across the

organization who have decision making authority over the five key areas of the Strategy:

- 1. Change Management/Internal Engagement;
- 2. Training;
- 3. Data Management & Analysis;
- 4. Communications;
- 5. Community Engagement & Partnerships.

Service-wide collaboration & embedded team of subject matter experts:

The R.B.D.C. Strategy relies on close collaboration between teams of civilian and uniform Members with operational and systems expertise from various areas across the Service such as Information Security, Analytics and Innovation, Governance, the Toronto Police College, Corporate Communications, and Legal Services. A dedicated team of subject matter experts was resourced to support



the development and implementation of the R.B.D.C. Strategy. Recognizing that the R.B.D.C. Strategy is complex, politically sensitive, and requires innovative approaches to design equity in how we do things, various roles were created in E.I.H.R. that provide a unique combination of skills and perspectives. These roles range from project management, strategic leadership, expertise in data systems and analytics with an equity lens, to community engagement and Indigenous-specific expertise and relationship development. The depth of knowledge on the R.B.D.C. Strategy allows for synergy and a high level of collaboration, access, and competency-building across the Service.

Robust mechanisms to enable transparency & accountability:

R.B.D.C. Strategy grounds its approach in principles of transparency and accountability. A Community Advisory Panel (C.A.P.) and an independent review of data analysis and findings represent two

unique ways to bring these principles to life. The C.A.P. includes 12 diverse residents of Toronto who bring expertise in community organizing, academia, and social services. They act as a sounding board, advising the process of data analysis, interpretation, and visualization; communication and sharing the findings with community members, and reviewing action plans. To ensure the work is transparent, the analysis process, practices, and findings are independently reviewed by two academics with vast expertise in race-based data efforts in policing context.

Modernizing technology and information systems for more robust analyses:

We undertook a comprehensive approach to race-based data collection by assessing our current information systems and practices, identified needs and gaps, and made forward-looking improvements to achieve the long-term goals of the R.B.D.C.

Strategy. We are undertaking a Service-wide information management modernization and embedding equity and privacy into our data practices to better meet our current and future information needs.

Strong commitment to action for change:

Our strategic approach for improved community safety and professional policing is to be solution-oriented and evidence-informed. The data collected under the R.B.D.C. Strategy is used with community and Service member input, to identify disparities to develop meaningful actions. We are committed to make cultural and systemic change, and be better for our communities. This approach is in line with police reforms currently being implemented, including the Board's 81 Recommendations for Police Reform and the recommendations outlined in The Independent Civilian Review into Missing Person Investigations Report Missing & Missed.

Roadmap to Equity: Vision to Analysis to Action Model

The R.B.D.C. Strategy is grounded in a clear mission and set of principles to guide its activities and decision-making process.

Vision

We are guided by the principles of The Way Forward in all our activities. The R.B.D.C. Strategy reflects these principles of

transparency, inclusiveness, equity, accountability, and sustainability, all with a systemic focus.

The Strategy will:

- Create increased public trust, confidence and support;
- Strengthen community relationships and partnerships; and,
- Assist the Service to achieve its ultimate goal of increased community safety and the provision of more effective and impactful policing services.

Purpose

The purpose of the R.B.D.C. Strategy is to operationalize the Board's Policy to use race-based data collection, analysis and public reporting to:

- Identify, monitor and eliminate potential systemic racism and racial bias;
- Identify equitable service delivery that can contribute to understanding and best practice;
- Advance the delivery of police services that further the fair treatment of every person by supporting the development of equitable policies, procedures, services and initiatives;
- · Preserve the dignity of individuals and communities; and,
- Enhance trend analysis, professional development and public accountability.

Guiding Principles

We are guided by the following principles for our activities under the R.B.D.C. Strategy. These principles reflect our modernization approach.

- Transparent: We are clear, open, and transparent about what we are doing, why we are doing it and what is our impact.
- **Inclusive:** We meaningfully engage and work collaboratively so that all voices are heard.
- Equitable: We drive organizational change by meeting people where they are and being proactive in removing systemic barriers to participation.
- **Systemic Focus:** We analyse information and make evidence-based decisions to improve how we do things.
- Accountable: We hold ourselves and each other accountable in achieving our goals.
- Sustainable: We align our efforts and focus resources on the right priorities to be sustainable, add value and have impact.

A Roadmap to Equity translates the R.B.D.C. Strategy vision into action to drive police reform and internal cultural change (Figure 2). We apply this entire cycle to each priority interaction.

The Roadmap consists of several stages that are applied consistently

over the phases of the Strategy when new police interactions are included:

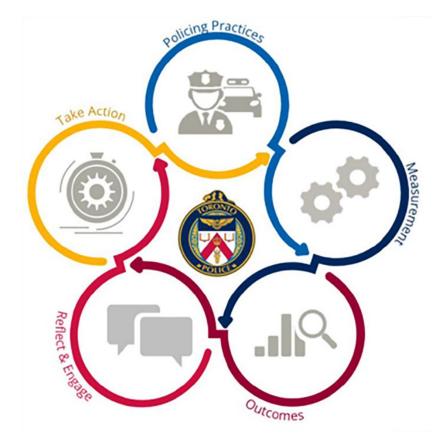


Figure 2: Roadmap to Equity: From Vision to Analysis to Action Model

Policing Practices (Identify priority interactions): We identify priority interactions by working with our Service members, partners and diverse communities to assess and prepare data collection systems, revise policies and training, and plan implementation for lasting impact.



Measurement (Gather the data): We cannot understand or change what we do not measure. In 2020, we began collecting perception race data in Use of Force and Strip Searches. In 2021, we started collecting perception race data in arrests, apprehensions, and youth diversions. Officers must select one race category based on their perception of an individual, as outlined in Ontario Anti-Racism Data Standards: Black, East/Southeast Asian, Indigenous, Latino, Middle Eastern, South Asian, or White. As the Strategy progresses, we will look to incorporate how members of the public can self-report their identities, including gender identity, ethnicity, and other important information.

Outcomes (Analyze data): We used meaningful analyses that support organizational change and improve relationships with communities. We developed an analysis framework that guides a series of interaction-specific analysis plans to consider the particular

data available and contributing factors relevant to understanding each type of interaction.

Reflect & Engage (Identify root causes): Engagement is at the heart of the Strategy. Throughout the Strategy, we engage with communities, the C.A.P., Service Members, stakeholders and academic partners to build trusted relationships needed to guide the Service. We work together to understand root causes to inform partnerships and be innovative and effective in making changes.

Take Action (Take action & evaluate): We leverage our data to better understand our impact, but data is only one part of this work. In our commitment to police reform we are undertaking systems and organizational culture change, including through our investment in Information Management and strategies led by the People & Culture pillar of the Service.

Key Components of the R.B.D.C. Strategy

The R.B.D.C. Strategy has five interrelated components to advance the work under various stages of the Roadmap to Equity. This section describes each strategic component that will evolve as the R.B.D.C. Strategy progresses and new police interactions are included.

1. Change Management/Internal Engagement

The success of the R.B.D.C. Strategy depends heavily on the support of our members. Internal support starts with ensuring our members are engaged, confident in the direction we are taking, and equipped to lead the change. The Change Management/Internal Engagement component of the Strategy is led by Senior Officers and supported by the R.B.D.C. team. The R.B.D.C. Strategy has built several mechanisms to ensure ongoing engagement and support for our members throughout different phases of the Strategy:

onset of the R.B.D.C. Strategy to be peer supports, assist frontline officers with their understanding, and inform analyses and reporting for each police interaction included in the R.B.D.C. Strategy. All divisions and specialized units that work with the frontline have identified civilian and/or uniform R.B.D.C. liaisons. Liaisons periodically receive updated resources and train-the-trainer modules from the Senior Officer Leads and R.B.D.C. team so they can engage with Service Members, answer their questions, and gather and give their feedback to R.B.D.C. Strategy implementation.

Unit Engagement Sessions: Rounds of engagement sessions equip Liaisons with updated information reflecting the current status of the R.B.D.C. Strategy so that they can support the frontline officers. They were asked to provide their perspectives on the data variables and other insights to glean from the data, including questions and



hypothesis. This process ensures that Member voices would be reflected in the analysis. We recognize that the findings from Phase 1 will impact our Members, especially those from racialized communities, and we will ensure that they receive appropriate resources to support them. A similar internal engagement approach will be reiterated for next phases of the R.B.D.C. Strategy.

2. Training

Training our Members is critical to the successful implementation of the R.B.D.C. Strategy. Members need to know what they are required to do and be adequately equipped with the right knowledge and skills. As the Strategy progresses and evolves, updated trainings are required to support Members along the way.

There are specific elements that define the approach to training to best support the scope of the R.B.D.C. Strategy.

Staged approach to training delivery: The training curriculum is being developed and delivered in stages to reflect specific requirements for different phases of the R.B.D.C. Strategy, as well as enabling refinement through feedback and learnings from previous stages. Mandatory training laid out common understanding across the Service on race-based data collection in policing, legal mandates, and the importance of bias-free policing to enhance community trust. As the R.B.D.C. Strategy progresses, new training is added to

incorporate any new or revised procedures and forms, and to reflect the experiences in the field and insights from data analysis and action plans developed at different phases of the Strategy.

Alignment with existing training & collaborative approach to training curriculum: The R.B.D.C. curriculum builds on, and aligns with, other relevant training provided to Members through the Toronto Police College (T.P.C.). This approach equips Members with consistent understanding and the ability to make connections and progressively build their knowledge throughout their training journey. Curriculum development is grounded in a collaborative process between E.I.H.R., T.P.C., other subject matter experts, and community stakeholders to ensure impactful content and effective delivery that builds solid understanding and competencies within the Service.

3. Data Management & Data Analysis

To identify and address potential systemic racial disparities, the R.B.D.C. Strategy grounds its approach in data management procedures and data privacy protections and a principle-based data analysis framework, consistently applied to each police interaction included in the R.B.D.C. Strategy.

Data Management: The race-based data should be collected in a consistent, transparent and meaningful manner to inform evidence-

based decision making and public accountability for policing services. Reporting to the Service's Chief Information Officer, a data assessment working group convened at the onset of the R.B.D.C. Strategy, with representation from relevant areas such as data collection systems, records management, privacy and security, analytics and open data. The working group is responsible for assessing information systems requirements, risks, gaps and opportunities, identify and recommend options, and develop and implement the race-based data collection, extraction and management procedures.

- i. Clarify the legal authority to collect and use data in a privacy-protected way: It is necessary to articulate the legal authority to collect and/or use data for specific purposes, including how different statutes may work together; and, whether the collection and/or use is new or existing. For Phase 1 of the R.B.D.C. Strategy, both new collection and use (Use of Force Reports) and existing collection (arrests and strip searches) were included. For youth records, we sought and received court authorization under the Youth Criminal Justice Act to use youth data for statistical purposes.
- ii. Assess data systems, identify, understand and/or addresslimitations: We start with assessing our current data

holdings, collection forms and templates, and processes and technologies to collect, verify, modify, access and store information. This allows us to identify data gaps and limitations, particularly where they inhibit our ability to conduct deeper analyses of issues from a racial equity lens, and to address those gaps through working with our data partners. Where not possible, it is important that we are transparent and communicate about the existing limitations in the analyses and our commitments to address them.

iii. Data quality issues and future systems improvements:

Assessing the quality of data collected is another aspect of understanding what analyses are possible, and how that supports reliable findings. Understanding data quality issues helps us to communicate how we can improve going forward. It is also an opportunity to further improve consistency in our reporting.

Privacy by design approach: We consider privacy by design principles in how we extract, manage, and use data under the R.B.D.C. Strategy. This is a crucial aspect of building community and Service Member trust. Designated staff with varying levels of access to personal information are tasked with different functions necessary to execute what is required.

The R.B.D.C. Strategy applies privacy principles such as data

minimization (collect and use the least amount of data necessary for the purpose), anonymization (remove directly identifying information), and take an open by default approach (plan to release as much data as feasible while ensuring no individual can be reidentified in the release).

For Phase 1, we worked with the Information Security Unit and Information Technology Services and conducted a preliminary privacy impact assessment. We engaged with the Information and Privacy Commissioner (I.P.C.) and sought their advice and input on plans and proposed approaches, including draft procedures for data extraction, management and protection of privacy. This also included developing a data retention schedule that is consistent with existing municipal by-laws governing police data retention.

Data analysis – A principle-based approach: Prior to accessing and using the data, we developed a general framework to articulate the principles, objectives and methodological approaches that are consistently applied to analyses of different police interactions under the R.B.D.C. Strategy. The framework is a living document that is informed by and responsive to the needs of community, stakeholder and Members. It guides a series of interaction-specific analytic plans to take into account the particular data and contributing factors relevant to each type of interaction (Figure 3).

The Data Analysis Framework for Racial Equity is consistent with

human rights principles and informs action plans to strengthen community-police relationships and support the advancement of professional and equitable police services. It is grounded in four principles that build on those underpinning the R.B.D.C. Strategy – transparency, inclusiveness, equity, systemic focus, accountability, and sustainability. These analysis principles are: use sound methods, centre race and racism, be solution-oriented and reflect engagement (**Figure 4**).

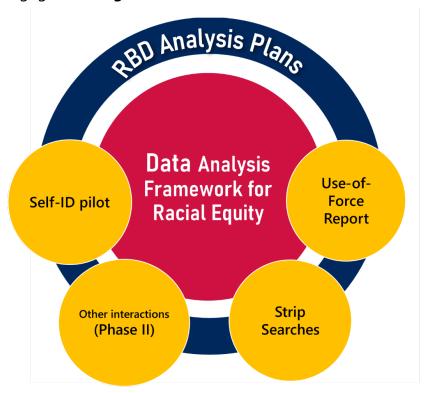


Figure 3: Data Analysis Framework for Racial Equity

We engaged with C.A.P., our Members, various stakeholders such as the Board's Anti-Racism Advisory Panel (A.R.A.P.), Police and Community Engagement Review (P.A.C.E.R.), the Wellesley Institute, Anti-Racism Directorate, Ontario Human Rights Commission, independent researchers, and community members through virtual town halls to refine the framework. This engagement was done prior to conducting any analyses and developing specific analytical plans grounded in the framework.

For Phase 1, we developed analytical plans for Use of Force incidents and strip search interactions. Once initial analyses were conducted, we engaged with the C.A.P. and our Members to collect their questions and insight. These insights were turned into research questions and hypotheses to further examine the data. By taking an iterative approach, the analyses and interpretation of results better reflect perspectives that bring together community experiences and operational expertise.

Sound Methods **Centre Race** Reflect Solution Oriented **Engagement** Methods used, The analysis centres race Analyses are Involve those with conducted in a including benchmarks, and racial disparities, and operational expertise, statistical models where possible, how race manner that as well as youth, racialzed intersects with other and technique are produces and Indigenous based on best social identities such as actionable insights peoples with lived gender, age and mental and allows the practices, and are experiences to explainable and health status in order to Service to make help us understand transparent. assess systemic racial evidence-based the data and disparities in policing decisions to interpret results. outcomes. improves their policies, practices, and procedures.

Figure 4: Principles guiding the Data Analysis Framework for Racial Equity



4. Communications

Clear, timely, and transparent communications are crucial to the success of the R.B.D.C. Strategy. Service Members and communities should see what we are doing, how we are doing it, and understand how it is benefitting them. Corporate Communications, in partnership with the Change Management and Community Engagement leads and the R.B.D.C. Team, lead the development of a communications plan to ensure relevant, clear and timely communication on the R.B.D.C. Strategy.

We use a variety of tools and formats to deliver messages that resonate, including public websites, and internal communications, town halls, focus groups, virtual tools, forums and other venues.

5. Community Partnerships & Engagement

Engagement represents an integral part of the R.B.D.C. Strategy and can only succeed by working together with community members, Service Members, community organizations, academics, and key stakeholders. Engagement was conducted throughout the entire implementation cycle from data collection, analysis, interpretation, and action planning.

The R.B.D.C. Strategy continues to strengthen and expand a solid engagement approach that brings together a unique combination of expertise and experiences to help the Service make progress in implementing comprehensive police reform and internal culture change.

We met with the Chief's Community Consultative Committees and Community-Police Liaison Committees, held town hall meetings, and conducted focus groups led by a network of community agencies across the city. We employed four key streams of engagements:

- Community engagement
- Stakeholder engagement
- Partnerships with institutions and academics
- Service Member engagement

Community engagement: The R.B.D.C. Strategy's success is predicated on community input. Meaningful engagement with community members informs training, assists with the development of action plans, and allows the Service to leverage existing opportunities to solidify partnerships.

We started engaging our communities at the onset of the R.B.D.C. Strategy and completed our largest community engagement endeavor to raise awareness, communicate a clear purpose for race data, and gather public feedback about how communities would like to be involved throughout the implementation process. 'In Communities' Words' was published in 2020 and summarizes what we heard from communities across the city.

A cornerstone of the engagement approach is the C.A.P., a forum for regular engagements with members of the community who bring their expertise, diverse perspectives and varied lived experiences through feedback and advice on the entire cycle of data analysis, interpretation, and action plans.

Stakeholder engagement: The work under the Strategy is informed by periodic consultations with key stakeholders such as the City of Toronto's Confronting Anti-Black Racism unit (C.A.B.R.), the Anti-Racism Directorate (A.R.D.), the Indigenous Justice Division at Ministry of Attorney General, the Ontario Human Rights Commission (O.H.R.C.), and the Information and Privacy Commissioner (I.P.C.).

Partnerships with institutions and academics: The R.B.D.C. Strategy benefits from partnerships with institutions and academics with expertise in race data collection and analysis, equity and human rights. We entered into a partnership with the Wellesley Institute, an organization with international and local expertise in equity and its impact on community well-being. We also partnered with Dr. Grace-Edward Galabuzi for curriculum design and with Dr. Lorne Foster and Dr. Les Jacobs to independently review our processes and data analysis for Phase 1 of the R.B.D.C. Strategy.

Service Member engagements: To support and involve our Members meaningfully and reach everyone across the Service, we established a R.B.D.C. Liaison program that is led by senior leaders

responsible for change management. Liaisons are assigned to be peer supports and resources located in each unit and Division, as well as to provide important frontline perspectives and act as a conduit to the team. Training is ongoing to continue to build competencies and capacities as people move ranks and roles.

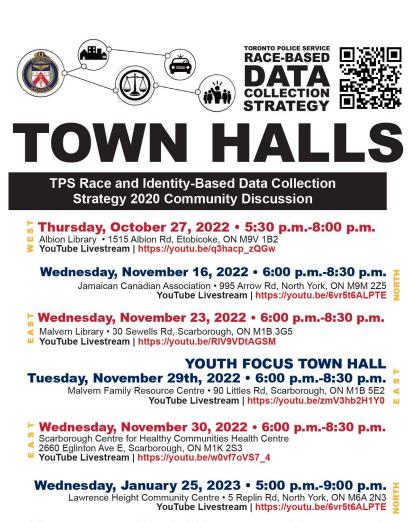
The Road Ahead: Action Plan & Next Steps

The R.B.D.C. Strategy does not end with data collection and analysis. We are committed to work with our Members and communities to develop, implement and measure the impact of concrete action plans and initiatives.

We are holding town halls across the city to hear community perspectives, experiences and ideas for real solutions.

It will take more time to know if the actions we are making now will be successful in affecting real change in the future, but we are committed to this work for the long term. We will continue to monitor and report our progress.

The actions advanced by the R.B.D.C. Strategy, together with other Service-wide endeavors such as the Equity Strategy and investments in Information Management, will support the Service in its transformational journey for more equitable policing.



These events will be held in person and livestreamed. Light refreshments provided.

Register for In-Person Town Hall: https://tinyurl.com/TPSRBDC

For More Info: https://www.tps.ca/race-based-data-collection/



For more information please email us:

equityinclusion@torontopolice.on.ca



https://www.tps.ca/race-based-data-collection/