

**Subject:** Citizen Submission | [DRAFT] TPS AI Policy consultation - December 2022

Good day, (:

This email contains my feedback submission regarding the [DRAFT] Toronto Police Services (TPS) Policy for the Use of Artificial Intelligence (AI) technology found [here](#), as part of the public consultation process described [here](#) [long links below].

Please feel free to contact me to discuss the content of this note at your convenience.

Happy holidays to you + everyone you love!

Best wishes,

Mark Timms  
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#### **GENERAL COMMENTS**

- **Cutting-Edge Training & Professional Development [for audiences internal to the City of Toronto Public service]: is important for everyone involved in the process through which decisions are made about the application of AI to resolve organizational problems — not just police officers.** This includes, the chief, the board — everyone involved in AI solution exploration/adoption should possess a minimum understanding of all AI options. Furthermore:
  - You can use ongoing PD for to create & foster common understanding amongst all city of Toronto personnel involved in applying this technology to protect its citizenry.
  - This training should include historic examples of AI technology applied to resolve operational problems in the police and/or related industries [read: the blockchain tracking, etc].
  - Students/participants should actually *\*practice\** applying their new understanding of AI technologies to resolve current problems.
  - This curriculum should be updated to include new insights quarterly. If not every session.
  
- **Effective Education & Awareness [for public audiences] will influence public confidence the City of Toronto's adoption and application of this technology.** Consider...
  - Creating and reinforcing a public network of community-based ambassadors to explain the application of this technology. for (1) selecting new vendors, and (2) telling to the public about it.
  - Setting engagement (impressions + likes + comments + etc) targets for related communications products that reflect no less than 30% of the population of the City of Toronto.
  - Establishing mechanisms for community participation in the proposal and implementation of new AI technologies to Toronto Police Service activities.

- **Please consider restricting the selection of third-party [AI] service providers to companies or individuals resident in Canada, who commit to protect TPS AI data (and all related inputs/outputs on Canadian servers).** I think your current policy barely scratches the surface of discussing the implications of the information you will consolidate and store for the subjects of authorized investigations. It makes no mention of the consequences of a breach resulting in the leaking of highly sensitive information to other nations.

#### **PLEASE CONSIDER INCLUDING/ADDING**

- A clear destruction process for information that is deemed of now/low intelligence value, as well as information collect incidentally or inadvertently.
- A process for preventing, detecting, and managing the aftermath of a breach/unplanned loss of data, proportional to the sensitivity of the data that has been compromised.
- Some process for mapping and mitigating the unintended/second order consequences of using experimental technologies to solve problems. This activity/organization could actually be broken into several groups, where one is responsible for identifying chaotic/wicked problems, and the other is responsible for generating mitigations (e.g.: red team/blue team dynamic).
- Groups could be convene virtually, and include a mix of Toronto police service officers + city of Toronto representatives + \*established\* academics/students + other aware/concerned citizens.

#### **DEFINITIONS – PLEASE CONSIDER ADJUSTING**

- **Please consider restricting your definition of AI technology to AI technologies, rather than choosing to consider PIA initiatives,**
  - I imagine that there are many initiatives that require privacy impact assessments that have absolutely nothing to do with AI.
  - I am concerned that conflating general privacy risk [associated with many non-AI initiatives] with every single proposal for a new AI technology may degrade the common organizational understanding of AI that you are trying to build across the TPS & supporting agencies/organizations.
- **Please consider including “deep fakes” in your definition of AI technology.** I am actually having a lot of fun imagining how TPS could apply deep fake technology to influence the outcome of investigations. Obviously, the initial emphasis for this technology will be human-in-the-loop decision support. But the applications of deep fakes to online investigations feels limitless. I’m really hopeful that you play in this space someday.
- **Please consider including definitions for incidental & inadvertent collection of information holding no intelligence value,** along with a process for the handling [and eventual destruction] of this information. You may also consider including a definition for “breach” — i.e.: the unintended loss of information, along with a process for how to handle breaches.

#### **MISCELLANEOUS**

- **Please consider making the detailed risk assessment tool available to the public via all city of Toronto websites** – not just the Toronto Police Service website, as described.