Concerns Regarding Use of Artificial Intelligence by Toronto Police Services

As a citizen of Toronto I have a number of concerns regarding the use of AI by TPS and in policing in general: AI in policing increases discrimination; AI removes safeguard policies administered with human oversight and discernment; and the effect of these two factors, in the context of public safety, can very easily lead to endangering the public in a variety of ways. Considering the novelty of the technology, we must admit we cannot foresee all the problems that are sure to arise, and from what little experience we do have as a society with AI, we do know there are a number of categories of problems that definitively occur when it is employed.

AI in policing learns from and then reinforces the prejudices of the police force using it. At this point, [this is a well-documented fact](https://www.technologyreview.com/2020/07/17/1005396/predictive-policing-algorithms-racist-dismantled-machine-learning-bias-criminal-justice/). Using AI to determine "where units should be deployed in order to maximize crime suppression", for example, will lead to more over-policing. For a department like TPS, like many police departments, with a well-known history of racial profiling, this will mean increased arrests, harassment, and over-policing of poor, black, brown, and indigenous peoples. These segments of the public will certainly not be safer as a result of this "public safety" policy.

AI can be used to automate, or replace, human checks and balances. This can free up the police force for other tasks, but poses great risks if implemented improperly. This is because while AI can solve complex problems in a fraction of the time it would take a human, they do this in a rather narrow way compared to humans. Imagine pouring over a massive dataset to glean some metric from it; an AI can do this quickly and efficiently compared to a human. However, the human, while doing it, can smell smoke and know there is a fire in the building. In short, while AI can perform a very specific task much better than us, they are completely blind to things that are immediately obvious to us. When you replace human oversight with AI oversight, you get proficiencies in a pinpoint-sized area and lose the massive power of simple observation and common sense. AI can make extreme errors that humans would catch in an instant.

Given these factors, it's important to use extreme caution in selecting and using these technologies. In TPS' proposed policy, technologies deemed to be High Risk, technologies "Where training or transactional data is known to be of poor quality, carry bias, or where the quality of such data is unknown;" are available for consideration. In laymen's terms, this means that known racist technologies can be considered for use and approved by the board. Why is this? The TPS should protect the public and itself as an organization by disallowing its use of High Risk AI technologies. In other words, why give the board the option of making a harmful decision? Disallow the use of biased technology.

Finally, considering the "black box" nature of AI, and the public's growing concern for police accountability, the public needs as much transparency into the use of these systems as possible. Errors and problems produced by these technologies have the power to be widespread and damaging to public safety -- because of this, the public should have ongoing insight and input into the implementation and their effects. As a Toronto citizen whom these technologies are intended to protect, I ask for these things: 1) ban the use of high-risk technologies; 2) implement a process for real public transparency in regards to the use of AI; and 3) give the public actual say in the use of AI -- if we don't want it, then we should have the right to not have it used on us -- especially in the name of protecting us.