To Whom It May Concern,

I am writing to express my concern, outrage and serious misgivings about the Toronto Police Service's Use Of New Artificial Intelligence Technologies Draft Policy.

It is a well documented fact AI use in policing has targeted Indigenous, Black and People of Colour disproportionally - and I fail to see in the policy you have laid out that this will not continue to be the case. Indeed, the speed with which you are proposing to push this through alone does not point to a meaningful community consultation, nor a thoroughly researched program. February 2022 is a mere two months away - which is an alarmingly short amount of time.

I also have to question the timing and integrity of this request for feedback. This policy is laid out in such a way that it appears AI use in policing is not already happening - which is grossly misleading.

In February 2020, you were forced to admit officers were using Clearview AI starting in October 2019 - one month after you denied using it. There has been no transparency on this issue, instead outright lies, and this request for public feedback does not inspire confidence. Indeed, the Board reviewing the use of AI will be your own Police Board - which once again will be police policing police. How is this not a conflict of interest?

Your manner of requesting feedback is also not accessible to everyone - language is evasive, coated in jargon and not easily readable. Furthermore, forcing respondents to write and send in a document is ableist and a barrier for public members who do not have access to computers.

Predictive policing algorithms are inherently racist - and need to be dismantled, not further funded and expanded. The data that they are pulling from is from decades of policing, which is a systemically racist institution. A 'human-in-the-loop' policy still does not deal with the root problem. It criminalizes poverty, targets Black, Indigenous and People of Colour and tramples on our Charter of Rights.

We need less money spent on the police, and more money spent on community programs that make it so people can survive and thrive.

Blythe Haynes