

## **Ombudsman Toronto's Investigation into the Toronto Police Service's Communications About its Vulnerable Persons Registry**

**Date:** October 2, 2024

**To:** City Council

**From:** Kwame Addo, Ombudsman

### **SUMMARY**

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Further to the January 2023 Memorandum of Understanding between the Toronto Police Service, Toronto Police Service Board, and Ombudsman Toronto, the purpose of this report is to brief City Council on the Ombudsman's Investigation into the Toronto Police Service's Communications about its Vulnerable Persons Registry. We are submitting our Investigation Report of September 2024 to City Council for consideration at its October 9-11, 2024 session. The Report was added to the agenda of the Toronto Police Service Board's public meeting on September 12, 2024.

### **RECOMMENDATIONS**

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The Ombudsman recommends:

1. City Council receive this report for information.

### **FINANCIAL IMPACT**

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This report has no financial impact.

## DECISION HISTORY

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This investigation was conducted in accordance with the January 2023 Memorandum of Understanding between the Toronto Police Service, Toronto Police Service Board, and Ombudsman Toronto.

On December 4, 2019, the Toronto Police Service (“Toronto Police”) launched its Vulnerable Persons Registry (“Registry”). Described by the Toronto Police as a voluntary database, the Registry offers the public an opportunity to create personalized de-escalation strategies for “vulnerable persons”, helping officers better understand and respond to specific behaviours they may encounter when interacting with individuals in crisis.

## COMMENTS

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### Our Investigation

On December 14, 2023, my office launched an investigation into the transparency and adequacy of the Toronto Police’s communications regarding its Registry. The investigation focused on the clarity and meaningfulness of the Toronto Police’s communications to the public about:

- The purpose of the Registry;
- The Registry’s registration, verification, and engagement processes; and
- The Toronto Police’s use of the information in the Registry.

The investigation also reviewed the Toronto Police’s internal communications to identify any potential gaps and assess staff’s knowledge about the Registry.

Ombudsman Investigators conducted 28 interviews with Toronto Police and Toronto Police Service Board staff and members of the public. My office also reviewed over 100 documents provided by the Toronto Police and examined Registry information available on the Toronto Police’s website and social media accounts.

### What We Found

My investigation identified gaps in the Toronto Police’s communication about the Registry that impact the public’s ability to make informed choices regarding its use.

Specifically, my office found that the Toronto Police does not provide the public with adequate information about the Registry’s purpose and processes, as well as how it stores, accesses, and uses the personal information collected from registrants.

## **The Recommendations**

Ombudsman Toronto's Investigation report contains 13 recommendations.

### [Recommendation 1](#)

Once the third-party arrangement is finalized, the Toronto Police should update its internal and external communication to explain the nature and scope of the arrangement. The communications should include details such as the impact of the arrangement on existing registrants and the difference between the current and new Registry.

### [Recommendation 2](#)

The Toronto Police should make meaningful details about the Registry's goal and purpose available and accessible on its website.

### [Recommendation 3](#)

The Toronto Police should train staff about their respective roles and responsibilities regarding the Registry and provide an update to all staff to increase awareness and understanding of the Registry.

### [Recommendation 4](#)

The Toronto Police should clearly define and publicize all the steps and requirements in registration process for the Registry. A clearly defined process would ensure that the public understands what information is mandatory before registering, what information is required to create a personalized de-escalation strategy, who can register, and which supporting documents and authority are acceptable.

### [Recommendation 5](#)

The Toronto Police should ensure that the Service Procedure and Registry practice are aligned.

### [Recommendation 6](#)

The Toronto Police should update the Registry page on its website to inform the public about the generic terms that will be used to fill gaps in the Registry application, and when that will be done.

### [Recommendation 7](#)

The Toronto Police should notify registrants when the Registry information is added to the Registry system and becomes available to officers.

### Recommendation 8

The Toronto Police should assign a point of contact to respond to Registry-related questions received from Toronto Police staff members and the public. The information for the Registry contact should be made available on the Toronto Police's website and the Registry application.

### Recommendation 9

The Toronto Police's communications about the Registry should clearly detail what the Registry is, where the information is stored, and when and how the Toronto Police will access and use the Registry information. These communications should also include details indicating that the Registry information shared with officers responding to a call is address-specific and not connected to the name of the vulnerable person.

### Recommendation 10

The Toronto Police should review and publicize the Registry information removal process, including where the information is removed from and when. The Toronto Police should notify registrants any time their information is removed.

### Recommendation 11

The Toronto Police should contact all verified and unverified registrants that were not added to the CAD. The Toronto Police should notify these registrants that their information is not accessible during a call for emergency service and confirm whether they wish to be added to or removed from the system.

### Recommendation 12

The Toronto Police should ensure that recommendations 2 through 10 are incorporated in any third-party arrangement to ensure that the current Registry communication gaps do not recur.

### Recommendation 13

The Toronto Police should provide Ombudsman Toronto with a status update on the implementation of these recommendations by December 12, 2024, and then on a quarterly basis thereafter.

## **Conclusion**

The Toronto Police have accepted all 13 of my recommendations in full and have committed to providing my office with updates on their implementation through a report to the Toronto Police Service Board. My office will continue to follow up quarterly with

the Toronto Police until we are satisfied that they have implemented our recommendations.

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## CONTACT

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## SIGNATURE



Kwame Addo

Ombudsman

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## ATTACHMENT

Ombudsman Toronto Report: An Investigation into the Toronto Police Service's Communications About its Vulnerable Persons Registry (September 2024)