

**CONFIDENTIAL**

**Report to:**

**OTTAWA POLICE SERVICE BOARD COMPLAINTS COMMITTEE**

**31 March 2026**

**Submitted by: Executive Director, Ottawa Police Services Board**

**Contact Person:**

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**SUBJECT: REVIEW OF COMPLAINT INV-25-93**

**REPORT RECOMMENDATIONS:**

**That the Ottawa Police Service Board's Complaints Committee:**

- 1. Receive this report and find that matters raised in Complaint No. INV-25-93 are appropriately addressed through the Board's Strategic Plan 2024-2027.**
- 2. Authorize the Executive Director to communicate the Committee's findings to the Inspector General, the Solicitor General, and the complainant.**
- 3. Authorize the Executive Director to publish this report on the Board's website for the purpose of informing the public of the Board's findings.**

**BACKGROUND**

Policy and Procedure Complaints are complaints referred to the Board by the Inspector General of Policing pursuant to subsection 107(6) of the *Community Safety and Policing Act, 2019* (CSPA). Under subsection 107(1) of the CSPA, the Inspector General is responsible for receiving and addressing complaints relating to policing, including complaints concerning the policies, by-laws, rules, or procedures of a police service board and the procedures established by a chief of police. Where the Inspector General determines that such a complaint is appropriately addressed at the governance level, subsection 107(6) requires the Inspector General to refer the complaint to the relevant police service board and to inform the complainant of that decision.

Upon referral, the Board is required under subsection 107(7) of the CSPA to review the complaint as it relates to Board policies and Chief's procedures, and to report back to

the Inspector General and to the Solicitor General on any steps taken. The Inspector General has generally specified a 90-day timeline for the completion of such reviews.

The Board's Policy CR-32 Policy and Procedure Complaints establishes the framework for administering these reviews. Under that policy, upon receipt of a referral the Executive Director notifies the Chief, gathers relevant Chief's Procedures and contextual information, conducts a review of applicable Board policies, and prepares a comprehensive report addressing the complaint as it relates to both Board policies and Chief's procedures. The Executive Director then submits that report to the Complaints Committee.

The Complaints Committee's role is to conduct an action-oriented review of the complaint and to identify opportunities for corrective action or improvement. In exercising its delegated authority, the Committee may request additional information, approve the Board's response to the Inspector General, endorse or modify recommendations contained in the report, and identify broader governance or policy issues for consideration by the Board or its committees. The review does not extend to findings regarding the conduct of individual members of the Ottawa Police Service.

Following the Committee's review, the Executive Director communicates the outcome to the Inspector General, the Solicitor General, and the complainant, subject to any limitations or conditions determined by the Committee.

## **DISCUSSION**

### **Summary of the complaint**

The complaint alleges that, by failing to require the Ottawa Police Service to produce a written, public plan to address the disproportionate use of force against Black and Middle Eastern Ottawa residents, the Board has not fulfilled its mandate to ensure adequate and effective policing.

The complaint references OPS race-based use of force data from 2020 to 2023, which shows that Black Ottawa residents were overrepresented in use of force incidents at 4.8 times their population share in 2020, declining to 3.1 times in 2022, before rising again to 3.3 times in 2023. The complainant submits that this persistent disproportionality has not been accompanied by a written, public reduction plan with measurable objectives and accountability mechanisms.

The complaint also references testimony provided by Vice Chair Carr at the Coroner's inquest into the death of Mr. Abdirahman Abdi in December 2024, raising concerns about whether the Board had adequately engaged with its existing use of force data and set goals against it. The complaint noted that the Vice Chair Carr indicated at the

inquest that the Board was concerned about the absence of meaningful change in use of force race data and that the Board was developing new key performance indicators in response. According to the complainant, describing the existing data as not yet a KPI, on the basis that the Board had not set a goal against it, reflects a gap in the Board's engagement with data it already possessed. As the Board's review is limited to policies and procedures, the Vice Chair's testimony is relevant only insofar as it reflects the state of the Board's governance at the time.

It is understood that the core of the complaint is that the Board failed to act on existing data by not requiring the OPS to develop a plan, with measurable targets, to reduce the overrepresentation of Black and Middle Eastern people in use of force incidents.

### **Steps taken in response to the complaint**

Upon receipt of the referral, the Board commenced a review focused on whether the complaint engages Board policies or procedures established by the Chief of Police, and whether any action is warranted in respect of either.

This review does not examine the facts of any specific use of force incident, nor does it assess the conduct of any individual member of the Ottawa Police Service. It is confined to assessing whether the concern raised by the complainant warrants attention to Board policies, the Chief's procedures, or other governance instruments within the Board's authority.

To inform this review, the following materials were examined:

- The complaint form filed by the complainant;
- The Inspectorate's referral correspondence of July 11, 2025;
- The Board's 2024–2027 Strategic Plan, adopted by the Board on July 28, 2025;
- The Strategic Plan Semi-Annual Report presented to the Board on December 5, 2025;
- The OPS DRIVE2 Strategy 2023–2027;
- The 2024 Annual Use of Force Report, including the external review by Dr. Lorne Foster (York University) and Dr. Les Jacobs (Ontario Tech University);
- The Mental Health Change Initiative Q1 2026 Update, including the Abdi Inquest Recommendations and Timelines tracker;
- The Body-Worn Camera Pilot and Expanded Deployment report (March 25, 2026).

## **Review of the complaint as it pertains to board policies or procedures**

### Applicable governance instruments

The complaint is referred under sections 107(1)(c) and (d) of the CSPA, which engage the Board's policies and procedures established by the Chief of Police respectively.

Before any finding can be made, the complainant's concern must be situated within these categories, or identified as engaging a different governance instrument.

The complainant's ask does not correspond to either category in the way those categories are conventionally understood. Board policy is the instrument through which the Board prescribes general rules governing police operations: how the Service will conduct itself in particular circumstances, what standards members must meet, what processes must be followed. Chief's procedures operationalize those rules at the Service level.

What the complainant seeks is not a general rule governing police operations, which is the function of Board policy, but rather a directed plan of action with measurable objectives and accountability mechanisms to reduce racial disproportionality in use of force. Under the CSPA, the proper governance instrument for that purpose is the Board's Strategic Plan.

Section 39(1) of the CSPA identifies the strategic plan as the instrument through which the Board addresses the core objectives of the police service and the adequacy of policing, including *interactions with members of racialized groups* (s. 39(1), paras. 3 and 4). Section 79(3)(a) of the CSPA requires that a chief of police "administer the police service and oversee its operation in accordance with the board's policies and strategic plan."

The Strategic Plan is not an advisory instrument. It carries the same binding authority as Board policy under the CSPA. The Chief is statutorily required to administer the Service in accordance with both. The distinction between the two instruments does not lie in their legal force but in how that force operates: where Board policy typically prescribes specific conduct or processes, the Strategic Plan establishes outcomes the Chief is required to pursue, while retaining significant discretion over how that pursuit is organized.

The concern raised by the complainant is therefore properly situated not as a failure of Board policy or of the Chief's procedures, but as a question of whether the Board has directed the Chief, through its Strategic Plan, to achieve proportionality in use of force

outcomes with sufficient specificity, measurability, and accountability. That is the question this review addresses.

The matter has already been addressed by the Board through the Strategic Plan

On July 28, 2025, the Board updated the Strategic Plan 2024-2027. Priority Area 3 of the Strategic Plan, “Equity, Diversity, and Inclusion – Strengthen our Commitment to Human Rights,” directly addresses the subject matter of this complaint. Strategic Objective 3.2 provides: “Improved proportionality of discretionary traffic stops and use of force with Black, Indigenous, Middle Eastern and other racialized persons.”

Appendix A of the Strategic Plan establishes measurable Key Performance Indicators for this objective. The use of force baseline is set at a combined disproportionality index of 46%, with disaggregated baselines for Black (26%), Middle Eastern (11%), and Indigenous (6%) communities. The target is proportionality reflective of demographic composition – in other words, the elimination of any racial disproportionality. This is, to the Board’s knowledge, the first strategic plan of any police service board in Ontario to set measurable targets against race-based use of force KPIs.

Vice Chair Carr’s testimony at the Abdi Inquest in December 2024, as referenced by the complaint, accurately reflected the state of affairs at that time. The Board had not yet adopted the Strategic Plan and was in the process of finalizing associated key performance indicators. It did so seven months later. The gap identified by the Board’s testimony at the Abdi inquest has thereby been closed.

The Service’s response: a coherent, multi-pronged effort addressing the multi-causal nature of use of force disproportionality

Racial disproportionality in use of force is not attributable to a single cause, and it cannot be resolved through a single intervention. It is a systemic problem, shaped by the intersection of officer decision-making, training, supervision, data infrastructure, mental health crisis response, community trust, and institutional culture. The Board has directed, and the Service is executing, a response that is designed to match the complexity of the problem: a coherent set of mutually reinforcing initiatives, each addressing a distinct contributing factor, but integrated through shared governance structures, common data frameworks, and overlapping community partnerships.

One of the key operational frameworks is the OPS DRIVE2 Strategy (2023-2027), the Service’s comprehensive equity, diversity, and inclusion plan, co-developed with the Community Equity Council (CEC). DRIVE2 is organized around four focus areas:

Community Service Delivery, Members' Work Environment, Leadership and Accountability, and Connecting and Learning. Race-based data serves as a primary key performance indicator across all four areas. Within DRIVE2, Action Item 1.1 established a Use of Force Community Review Panel; Action Item 1.3 launched the Race and Equity Data Strategy, which provides the analytical infrastructure for measuring disproportionality; Action Item 1.5 introduced a Call Referral Model to divert appropriate calls to non-police responders; and Action Item 1.16 initiated the body-worn camera deployment. DRIVE2 is not a standalone equity document. It functions as the operational translation of the Board's strategic direction into the Service's daily work, and it structures the relationship between the Service and the CEC across every initiative described below.

The Mental Health Change Initiative (MHCI), launched in January 2025 in response to 28 recommendations directed to the Service by the jury in the Abdirahman Abdi Inquest, addresses the critical intersection between mental health crisis response and racial disproportionality in use of force. As of Q1 2026, work has been initiated on all 28 recommendations. The initiative operates through a dual advisory model: the Mental Health Advisory Council (MHAC), an external body providing community and clinical expertise, and a network of internal Change Agents embedded across operational units. The MHAC has established sub-committees and is providing direct input into policy, training design, and data practices. The MHCI has achieved cross-sectional integration with more than ten OPS divisions and sections, reflecting the recognition that mental health crisis response cannot be siloed within a single unit. Critically, several Inquest recommendations bear directly on the subject of this complaint: Recommendation 6 requires training that addresses the intersection of anti-Black racism and mental health crisis; Recommendations 15 and 16 require the CEC to be consulted on the design and delivery of anti-Black racism training; Recommendation 17 links the Active Bystandership for Law Enforcement (ABLE) program and body-worn cameras to accountability in use of force encounters; Recommendation 18 requires that use of force requalification training incorporate racial disparity data; and Recommendation 24 requires the Service to report to the Board on its history of use of force racial disparities and its plan to reduce them.

Training modernization is a central line of effort that runs through both DRIVE2 and the MHCI. Mandatory anti-Black racism and implicit bias training has been in place since Q3 2023 and is currently undergoing comprehensive review in consultation with the CEC, in accordance with Inquest Recommendations 15, 16, and 23. The MHCI is driving a broader transformation of training methodology to ensure it is scenario-based,

trauma-informed, and grounded in de-escalation principles. A formal research partnership with Carleton University is now operational, studying de-escalation techniques and their effectiveness in real-world encounters. This partnership provides the Service with an independent, evidence-based foundation for training design, rather than relying solely on internal assessment. The convergence of anti-Black racism training, de-escalation methodology, mental health crisis intervention, supported by academic research and community input, represents a deliberate effort to reshape the decision-making framework that officers bring to encounters with racialized individuals in crisis.

The Body-Worn Camera (BWC) program functions as both an accountability mechanism and a tool for institutional learning. Phase 1, completed in November 2025, deployed 30 cameras to Crisis Intervention Team members and Change Agents, deliberately targeting the officers most likely to respond to high-risk encounters involving persons in mental health crisis. Phase 2 will expand deployment to 200 cameras by the end of 2026, with full deployment of 850 cameras planned by the end of 2027. The BWC program has been presented to both the CEC and the MHAC, reflecting the Board and the Service's commitment to community engagement and transparency in the rollout of surveillance technology. Early operational observations indicate that BWCs are supporting supervisory coaching on use of force incidents, providing realistic training material, strengthening accountability for bias-free policing, and improving documentation of encounters. The Abdi Inquest jury specifically identified BWCs as a critical tool for supervisory review of use of force incidents (Recommendation 17) and for training evaluation (Recommendation 20). Although BWCs do not, by themselves, reduce disproportionality, their value lies in creating a reliable evidentiary record that supports supervision, training, transparency, and accountability, each of which addresses a different contributing factor to the problem.

Underpinning all of these initiatives is a growing data and research infrastructure. The Race and Equity Data Strategy (DRIVE2 Action Item 1.3) provides the data framework for measuring disproportionality and tracking progress against the Board's KPIs. An internal mental health data dashboard is in development, which will allow the Service to code and analyze call types, intervention outcomes, and use of force incidents involving persons in mental health crisis. Since 2020, Dr. Lorne Foster of York University and Dr. Les Jacobs of Ontario Tech University have conducted an independent external review of the Service's race-based use of force data. Their June 2025 review confirmed that Black and Middle Eastern subjects remain overrepresented in use of force incidents at 3.3 times their share of the population, while also documenting significant progress: a

29% reduction in use of force incidents since 2020, a 17% reduction in application of force since 2022, and a 70% reduction in subject injuries since 2022. The reviewers specifically commended the DRIVE2 Strategy and recommended that OPS continue to refine its disproportionality indexes. The Carleton University de-escalation research study adds a further layer of independent analysis. Together, these data and research partnerships ensure that the Board and the Service are not assessing their own progress in a vacuum, but against externally validated benchmarks.

Finally, the ANCHOR program (Alternate Neighbourhood Crisis Response) addresses disproportionality at its upstream source by providing non-police crisis response for mental health calls where appropriate. ANCHOR reduces the total volume of encounters in which use of force is possible, particularly in communities where the intersection of mental health crisis and racial disproportionality is most acute. Combined with the Call Referral Model under DRIVE2 and the MHCI's community consultation with the Ottawa Black Mental Health Coalition, the Ottawa Aboriginal Coalition, and the Guiding Council for Mental Health and Addictions, ANCHOR is part of a broader effort to ensure that the right responder reaches the right person at the right time.

These initiatives are not parallel workstreams operating independently. They are integrated through shared governance structures (the CEC, the MHAC, and the Board's Policy and Governance Committee), common data frameworks (the Race and Equity Data Strategy, the mental health data dashboard, and the external academic reviews), and overlapping community partnerships. The CEC, for example, is a co-development partner on DRIVE2, a consultative body for anti-Black racism training under the Inquest recommendations, and is also engaged in the BWC rollout. The MHAC provides input into training design, BWC deployment, and de-escalation research. These partnerships reflect a deliberate governance architecture in which community perspectives are embedded at every level of the response, and in which multiple initiatives are mutually reinforcing.

#### Reporting and accountability framework

The Board has established a structured reporting framework to monitor progress against these commitments.

A review of a strategic KPI and strategic projects dashboard – including indicators and initiatives that are relevant to the subject matter of the complaint – is now a standing item at each regular Board meeting, pursuant to the Board's revised Calendar of Monitoring Requirements. These frequent check-ins allow the Board to closely monitor progress and provide opportunities for structured conversations about the Chief's

implementation of the strategic plan. The Chief also provides in-depth reports to the Board on progress against the Strategic Plan on a semi-annual basis, and *ad hoc* project-specific updates – e.g. BWC program – on demand.

The Mental Health Change Initiative reports to the Policy and Governance Committee quarterly, with the next update scheduled for the summer of 2026.

The annual Use of Force Report is expected at the June 2026 Board meeting.

The Board also monitors progress of the implementation of the DRIVE2 Strategy on a semi-annual basis, at minimum, through the Annual Report on Human Rights, Equity, Diversity and Inclusion and a dedicated DRIVE2 Strategy Update.

Further, as required by Policy BC-1 Board / Chief Relationship, the Board measures the Chief's performance – considered synonymous with organizational performance – against organizational accomplishment of the goals and objectives of the Strategic Plan. The Chief's progress on Strategic Objective 3.2 is therefore a factor in the Board's formal assessment of the Chief's performance. That linkage is the most direct accountability mechanism available to the Board under the CSPA, and it ensures that the commitment made in the Strategic Plan is embedded in the most consequential governance relationship.

## **Findings**

The seriousness of the concern raised by the complainant merits acknowledgement. Racial disproportionality in use of force is a matter of significant public interest, and the Board takes its responsibility to address it through the governance instruments available to it under the CSPA.

The concern about racial disparities in use of force incidents is addressed through the Board's Strategic Plan and the operational initiatives it directs. The Board's Strategic Plan is a binding governance instrument under sections 39 and 79(3)(a) of the CSPA. The Chief of Police is required by s. 79(3)(a) to administer the police service and oversee its operation in accordance with the Board's policies and strategic plan. Strategic Objective 3.2, with its quantified KPIs and targets, directly requires the Chief of Police to achieve improved proportionality in use of force outcomes for Black, Indigenous, Middle Eastern, and other racialized persons.

The review has considered whether additional Board policy would add to what the Strategic Plan already requires. A Board policy could state a general principle, but the

specific, measurable, time-bound direction that the complainant seeks is precisely what the Strategic Plan provides.

The review is satisfied that the Service has presented a coherent and comprehensive set of initiatives that, taken together, are reasonably designed to achieve the objectives set out in Strategic Objective 3.2 of the Strategic Plan.

The review acknowledges that a single consolidated action plan would have been one adequate means by which the Chief could have structured the pursuit of those objectives. However, the Chief's autonomy under s. 79(3)(a) in determining how the Service is administered in pursuit of the Board's strategic objectives does not constrain implementation to any single form.

Given the multi-causal nature of racial disproportionality in use of force, a coherent set of mutually reinforcing initiatives, each targeting a distinct contributing factor, is equally adequate, and may in fact be better suited to the complexity of the problem the Board has directed the Chief to resolve.

The Board continues to monitor and assess progress through the reporting architecture described above, and retains the authority to require further action if results do not demonstrate meaningful progress within the Strategic Plan's reporting cycle.

## **CONSULTATION**

N/A

## **FINANCIAL IMPLICATIONS**

N/A

## **SUPPORTING DOCUMENTATION**

Document 1: Complaint form filed by complainant

Document 2: Inspectorate of Policing referral correspondence, July 11, 2025

## **CONCLUSION**

The persistence of racial disproportionality in use of force is a concern the Board has itself identified, named, and acted on.

This review concludes that the concern is being addressed through the governance instrument best suited to the task. The Board's Strategic Plan 2024-2027, adopted in July 2025, establishes binding, measurable targets for the reduction of racial disproportionality in use of force. The Chief of Police is statutorily required to administer the Service in accordance with it. The initiatives currently underway represent a coherent, multi-pronged response that is reasonably designed to achieve the outcomes

the Strategic Plan requires. Additional Board policy would not strengthen what the Strategic Plan already directs. The specific, measurable, time-bound accountability the complainant sought is precisely what Strategic Objective 3.2 and its associated KPIs provide.

The Board has established a structured reporting framework to monitor progress against these commitments at every regular meeting, on a semi-annual basis through the Strategic Plan and DRIVE2 reporting cycles, and annually through the Use of Force Report. If results do not demonstrate meaningful progress within those cycles, the Board retains full authority to require further action from the Chief.

It is recommended that the Complaints Committee receive this report and that no further action on the complaint be taken at this time.