



Policy Name:	BIAS-FREE POLICING		
Policy #:	AD 2.1	Last Updated:	2022-06-08
Issued By:	SUPPORT SERVICES BUREAU	Approved By:	SURREY POLICE BOARD
		Review Frequency:	ANNUALLY

RELATED POLICIES

AD 1.1 Ensuring Inclusivity and Diversity in Surrey Police Service

AD 5.7 Human Rights and Respectful Workplace

AD 7.5 Mandatory Training

OP 3.1 Arrest and Detention

OP 3.2 Searches of a Person

OP 4.17 Intimate Partner Violence

OP 4.30.4 Statements - Victims and Witnesses

OP 4.30.5 Use of Interpreters and Translators

OP 4.45 Street Checks – Bias-free Policing

OP 4.52.1 Vulnerable Persons – Trauma-Informed Practices

OP 4.52.2 Vulnerable Persons – Mental Health

OP 4.52.3 Vulnerable Persons – Sex Workers

OP 4.52.4 Vulnerable Persons – Victims of Crime

OP 4.52.5 Vulnerable Persons – Third Party Reporting

OP 4.52.6 Vulnerable Persons – Harm Reduction

OP 6.1.1 Victim Services

OP 6.1.2 *Indigenous Relations*

OP 6.1.3 *Equity, Diversity and Inclusion*

1. PURPOSE

- 1.1. To outline the expectations regarding the duty of Surrey Police Service (SPS) Employees to deliver bias-free services to the public, as well as internally.

2. SCOPE

- 2.1. This policy applies to all SPS Employees.

3. POLICY

- 3.1. All Employees have a duty to deliver services impartially and equitably, in a manner that upholds human rights, and without discrimination based on race, national or ethnic origin, colour, religion, age, sex, sexual orientation, marital status, family status, disability, gender identity and expression, political beliefs, types of employment, or economic or social standing.
- 3.2. SPS commits to providing services in a culturally safe, responsive, and trauma-informed manner, in accordance with OP 4.52.1 *Trauma Informed Practices*.
- 3.3. Employees will provide services to Vulnerable People as outlined in the following “Vulnerable Persons” related policies: OP 4.52.2 *Mental Health*, OP 4.52.3 *Sex Workers*, OP 4.52.4 *Victims of Crime*, OP 4.52.5 *Third Party Reporting*, OP 4.52.6 *Harm Reduction*, OP 4.17 *Intimate Partner Violence*, OP 6.1.2 *Indigenous Relations*, and OP 6.1.3 *Equity, Diversity and Inclusion*.
- 3.4. Members must conduct interactions with members of the public in accordance with OP 4.45 *Street Checks – Bias-Free Policing*.
- 3.5. Members must conduct personal searches in accordance with OP 3.2 *Searches of a Person*, including:
- i. recognizing and handling items of religious and/or cultural significance in a religious and/or culturally sensitive way;
 - ii. offering or making accommodations in response to a person’s gender identity or expression; and
 - iii. adherence to criteria and procedures for conducting, authorizing, documenting, and monitoring the use of strip searches and internal searches.

- 3.6. Employees will support access to justice services, through Victim Services referrals and with the use of interpreters as outlined in OP 6.1.1 *Victim Services*, OP 4.30.4 *Statements - Victims and Witnesses*, and OP 4.30.5 *Use of Interpreters and Translators*.
- 3.7. Employees will create and work in a workplace that is free from discrimination, disrespectful behaviour, and harassment, and must follow AD 5.7 *Human Rights and Respectful Workplace*.
- 3.8. SPS maintains an inclusive workplace by embedding ethical systems into administrative and operational policies and processes. Employees will follow AD 1.1 *Ensuring Inclusivity and Diversity in Surrey Police Service*.
- 3.9. Training to enhance bias-free policing in the following areas will be provided in accordance with AD 7.5 *Mandatory Training*:
- i. Training to Promote Equitable and Unbiased Policing:
 - a. In addition to provincially approved training, Members who work in a section, unit, or team whose primary duties include working with Vulnerable Persons must refresh their knowledge in this area at the frequency determined by the Leadership Development Unit or by their unit Supervisor;
 - b. The Leadership Development Unit or their delegate will periodically provide experiential and interactive training concerning vulnerable community members, including active engagement to overcome biases training, to all Employees. This training includes learning about the science of bias;
 - c. The Community Engagement Unit will work with the Leadership Development Unit to provide learning opportunities for all Employees about diverse communities and will engage presenters from diverse communities to advance the cultural competence of all SPS Employees;
 - ii. Indigenous Cultural Safety, Humility, and Knowledge:
 - a. In addition to provincially approved training, the Indigenous Relations Unit will collaborate with Indigenous organizations and the Leadership Development Unit to provide education to Employees about local Indigenous cultures and local concerns, which will help build the cultural competency of SPS employees (see OP 6.1.2 *Indigenous Relations Unit*);
 - iii. Trauma-Informed Practices:
 - a. In addition to provincially approved training, to ensure SPS training is in keeping with knowledge development and emerging best practices, trauma-informed training approved by the Leadership Development Unit or Training Unit or their delegate will be incorporated into annual mandatory training; and
 - b. Members who work in a section, unit, or team whose primary duties include working with Vulnerable Persons must refresh their knowledge of trauma-informed practices at

the frequency determined by the Leadership Development Unit or by their unit Supervisor.

4. PROCEDURE

Member

4.1. Members must complete:

- i. all training outlined in AP 7.5 *Mandatory Training*; and
- ii. On-line training individually and comprehensively by reviewing all learning materials thoroughly and completing the required exercises.

4.2. Members must not engage in “profiling” (see definitions) under any circumstances. The exception is criminal and/or geographic profiling conducted by Members with specific training related to Behavioural Sciences.

4.3. In accordance with OP 4.45 *Street Checks – Bias-free Policing*, Members may, when interacting with a person, request the person to voluntarily provide information about identifying factors, and may record that information, provided that the Member reasonably believes the information serves a specific public safety purpose and/or is relevant to a call for service. In these circumstances, the Member must tell the person of the reason for the request and must ensure the person understands that providing the information is voluntary, and that they are not required to provide the information. The Member must also document in the PRIME-BC file the circumstances under which they made the request.

4.4. Written commentary or narrative in police files relating to race, national or ethnic origin, colour, religion, sex, sexual orientation, marital status, family status, disability, gender identity and expression, political beliefs, types of employment, or economic or social standing must only be included when it is directly related to the matter under investigation (e.g., an assault motivated by hate). Members must be able to articulate their rationale for including this type of commentary.

4.5. For statistical purposes, Members may add identifying factors to entities in a PRIME-BC file only if the Member is confident that the information is accurate. Assumptions about identifying factors are not appropriate and must not be included.

Supervisor

4.6. Supervisors will ensure that Members or civilian Employees who report to them have successfully completed all mandatory and periodic training as outlined in this and other related policies.

4.7. Supervisors will promptly and thoroughly investigate reports that suggest a Member or civilian Employee has conducted themselves in a manner which appears to demonstrate bias.

4.8. Supervisors will review all “Street Checks” to ensure they are being conducted in accordance with OP 4.45 *Street Checks – Bias-Free Policing*. If a Supervisor identifies incidents of bias in the conduct

of Street Checks, the Supervisor must ensure that the involved Member(s) receives training on the appropriate procedures for conducting Street Checks.

4.9. Supervisors will ensure that personal or identifying information recorded on a PRIME-BC file is relevant to the matter under investigation.

Leadership Development Unit

4.10. The Leadership Development Unit will keep records of all training completed by all Employees and ensure that Employees complete their mandatory training within specified timelines.

Policy Management Unit

4.11. Policies related to arrest and detention, interviewing suspects, search and seizure, and collection of evidence, as well as this policy, will be reviewed annually to ensure that these policies remain consistent with BC Provincial Policing Standards, legislative amendments, applicable case law related to the rights to equal treatment, protection, and benefit under the law, including the *Canadian Charter of Rights and Freedoms*.

Data Analytics Unit

4.12. Audits to examine compliance with SPS policies or procedures shall be conducted annually relating to the following policies:

- i. personal searches (OP 3.2 *Searches of a Person*);
- ii. investigations involving people in vulnerable circumstances (OP 4.52.4 *Vulnerable Persons – Victims of Crime*);
- iii. interactions with persons in vulnerable circumstances (OP 4.45 *Street Checks – Bias-Free Policing*);
- iv. provision of information and services to victims of crime (OP 6.1.1 *Victim Services*);
- v. third party reporting (OP 4.52.5 *Third Party Reports*);
- vi. the use of interpreters or translation services (OP 4.30.4 *Statements – Victims and Witnesses*; OP 4.30.5 – *Use of Interpreters and Translators*); and
- vii. mandatory training (AD 7.5 *Mandatory Training*).

4.13. At least one of the following types of records will be analysed at least once per year, disaggregated by ethnicity and gender of subjects:

- i. Subject Behaviour Officer Response (SBOR) reports;
- ii. prisoner bookings; or
- iii. other records identified by the Surrey Police Board.

Professional Standards Section

4.14. Professional Standards Section (PSS) will maintain records of complaints received which allege that an SPS Member demonstrated bias while performing their duties. The specific nature of the bias or perceived bias will be captured (e.g., religious, racial, gender-based, etc.). PSS will prepare a

periodic report about bias-related complaints and will present the report to the Chief Constable or delegate.

- 4.15. PSS will periodically review the captured data, along with any other informed metrics they identify and implement, to identify trends and facilitate the evaluation of policy compliance and training effectiveness. PSS will take investigative action if they recognize any emerging trends regarding bias-related complaints and will report on their actions to the Chief Constable.

Chief Constable

- 4.16. The Chief Constable or delegate has the overall responsibility to ensure that all Employees receive training in Bias-Free Policing, and that appropriate steps are taken to ensure compliance with this policy.
- 4.17. At the request or requirement of the Surrey Police Board, the Chief Constable or delegate will present information to the Surrey Police Board regarding complaints of bias, and emerging trends in this area.
- 4.18. The Chief Constable or delegate will determine an appropriate method for periodically reviewing the effectiveness of this policy and for making aggregate data about compliance with this policy available to the public.

APPENDIX A: DEFINITIONS

“BCPPS” means the British Columbia Provincial Policing Standards issued pursuant to the *Police Act*.

“Bias free service” means delivering services impartially and equitably, in a manner that upholds human rights, and without discrimination based on race, national or ethnic origin, colour, religion, age, sex, sexual orientation, marital status, family status, disability, gender identity and expression, political beliefs, types of employment, or economic or social standing.

“Gender expression” means how a person presents their gender. This can include behaviour and outward appearance as well as their chosen name and pronouns.

“Gender identity” means a person’s individual sense of being a woman, a man, both, neither, or anywhere along the gender spectrum. A person’s gender identity may be the same as or different from their sex at birth and is independent of their sexual orientation.

“Identity factors” means any information which, alone or in combination with out information, can be used to identify a person. Identity Factors include but are not limited to economic or social status, race, colour, ancestry, place of origin, religion, marital status, family status, physical or mental disability, sex, sexual orientation, gender identity or expression, or age.

“PRIME-BC” means Police Records Information Management Environment, the provincial police records management system.

“Profiling” means the practice of attributing certain criminal activities to identified groups of individuals based solely on that group’s race, national or ethnic origin, colour, religion, age, sex, sexual orientation, marital status, family status, disability, gender identity and expression, political beliefs, types of employment, or economic or social standing. Profiling is the result of conscious or unconscious biases and may result in the targeting of the identified group.

“SBOR Reports” means Subject Behaviour Officer Response use of force template in PRIME-BC.

“Sexual orientation” means a person’s identity in relation to the gender or genders to which they are sexually attracted.

“Supervisor” means a Team Leader, Manager, Sergeant, Staff Sergeant, Inspector, Superintendent, Deputy Chief Constable, Chief Constable, and any other person acting in a Supervisory capacity who is accountable for a particular area or shift on behalf of SPS.

“Vulnerable Person” means a person who, because of their age, a disability, or other circumstances, whether temporary or permanent, is in a position of dependence on others or is otherwise at a greater risk than the general population of being harmed by a person in a position of authority or trust relative to them. Examples of vulnerable persons include but are not limited to: persons with substance use disorders; persons with physical or mental health challenges; persons with disabilities or who may have communication barriers (e.g., language, hearing, or speech); persons with diverse gender identity or expression; persons who are unhoused or precariously housed; persons who are victims of sexual and/or intimate partner violence; persons who are being exploited and/or are involved in subsistence sex work;

persons who may be less inclined to report or speak to police because of precarious legal status (e.g., victims or witnesses who have outstanding warrants or with precarious immigration status); persons who are elderly; and persons who are children.

APPENDIX B: REFERENCES

British Columbia Provincial Policing Standards - Subject 3.2.5 *Training to Promote Equitable and Unbiased Policing*, coming into effect July 30, 2024.

British Columbia Provincial Policing Standards – Subject 3.2.6 *Training to enhance service delivery to vulnerable communities*, coming into effect December 31, 2022 and July 30, 2024.

British Columbia Provincial Policing Standards – Subject 6.1.1 *Promoting Unbiased Policing*, coming into effect July 30, 2023.

Canadian Charter of Rights and Freedoms, Part I of the Constitution Act, 1982

Freedom of Information and Protection of Privacy Act, R.S.B.C. 1996, c. 165