



Registered Nurses' Association of Ontario  
L'Association des infirmières et infirmiers  
autorisés de l'Ontario

Hon. Yasir Naqvi  
Minister of Community Safety and Correctional Services  
18<sup>th</sup> Floor, George Drew Building  
25 Grosvenor Street  
Toronto, ON M7A 1Y6

December 16, 2015

**RE: Support for Rights-Based Framework for Policing**

Dear Minister Naqvi,

As a fitting way to mark Human Rights Day<sup>1</sup> on December 10, the Registered Nurses' Association of Ontario (RNAO) urges the Ministry of Community Safety and Correctional Services to strengthen the proposed draft regulation, Collection of Identifying Information in Certain Circumstances – Prohibition and Duties, pertaining to the *Police Services Act*.<sup>2</sup>

Consistent with our Oct. 2 letter urging a permanent end to arbitrary and discriminatory street checks,<sup>3</sup> RNAO encourages the province to heed concerns by community members, academics, human rights, and civil society groups on the proposed regulation.<sup>4</sup> RNAO urges the ministry to adopt the suggested amendments identified in the joint response that included organizations such as the African Canadian Legal Clinic, Canadian Civil Liberties Association, Law Union of Ontario, and Ontario Human Rights Commission.<sup>5</sup> Adopting these recommendations would allow the province to operationalize the minister's and the Legislative Assembly's objective to stop arbitrary and discriminatory street checks that violate the *Canadian Charter of Rights and Freedoms* and the *Ontario Human Rights Code*.<sup>6</sup>

In the context of ongoing resistance to reform of street checks by policing leadership,<sup>7 8</sup> RNAO would like to specifically underscore the need for reporting and oversight to strengthen accountability. In particular, an independent monitor to be appointed through agreement with the minister and the Ontario Human Rights Commission<sup>9</sup> would help to build trust and confidence in the police, ensure compliance with human rights legislation, and enable safer communities.

With thanks for your consideration, RNAO stands with community members and groups urging action to strengthen human rights protection in policing for all Ontarians.

Kind regards,

A handwritten signature in black ink, appearing to read "Doris Grinspun", with a long horizontal flourish underneath.

Doris Grinspun, RN, MSN, PhD, LLD(hon), O.ONT  
Chief Executive Officer, RNAO

## Copy:

Regulatory Registry, Ministry of Community Safety and Correctional Services

African Canadian Legal Clinic  
Campaign to Stop Police Carding  
Canadian Civil Liberties Association  
Concerned Citizens Against Carding,  
Criminology Department of Ryerson University  
Law Union of Ontario  
Ontario Human Rights Commission  
Osgoode Society Against Institutional Injustices  
Peel Coalition Against Racialized Discrimination  
South Asian Bar Association

## References

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<sup>1</sup> United Nations (2015). Human Rights Day. <http://www.un.org/en/events/humanrightsday/>

<sup>2</sup> Regulatory Registry (2015). Collection of Identifying Information in Certain Circumstances--Prohibition and Duties. Regulation Number O. Reg. 268/10. <http://www.ontariocanada.com/registry/view.do?postingId=20202&language=en>

<sup>3</sup> Registered Nurses' Association of Ontario (2015). Letter to Minister Naqvi: Abolish Police Street Checks to Safeguard Human Rights and Improve Health. Toronto: Author.  
[http://rnao.ca/sites/rnao-ca/files/RNAO\\_-\\_Letter\\_to\\_Minister\\_Yasir\\_Naqvi\\_-\\_Re\\_Abolish\\_Police\\_Street\\_Checks\\_-\\_Oct\\_2\\_2015.pdf](http://rnao.ca/sites/rnao-ca/files/RNAO_-_Letter_to_Minister_Yasir_Naqvi_-_Re_Abolish_Police_Street_Checks_-_Oct_2_2015.pdf)

<sup>4</sup> Gillis, W. (2015). Coalition calls on Ontario to change draft carding regulations. *Toronto Star*, December 7, 2015. <http://www.thestar.com/news/gta/2015/12/07/coalition-calls-on-ontario-to-change-draft-carding-regulations.html>

<sup>5</sup> African Canadian Legal Clinic, Campaign to Stop Police Carding, Canadian Civil Liberties Association, Concerned Citizens Against Carding, Criminology Department of Ryerson University, Law Union of Ontario, Ontario Human Rights Commission, Osgoode Society Against Institutional Injustices, Peel Coalition Against Racialized Discrimination, South Asian Bar Association (2015). A joint response to Ontario draft regulation "Collection of Identifying Information in Certain Circumstances--Prohibition and Duties." Toronto: Authors.  
<http://www.ryerson.ca/content/dam/criminology/tank/documents/2015-11-24-Joint%20Position%20re%20Regulation%20on%20Carding%20FINAL.pdf>

<sup>6</sup> Ibid, 2-3.

<sup>7</sup> Csanady, A. (2015). Ontario police chiefs 'disappointed' with safety minister's stance on carding reforms. *National Post*, October 26, 2015. <http://news.nationalpost.com/news/canada/ontario-police-chiefs-disappointed-with-safety-ministers-stance-on-carding-reforms>

<sup>8</sup> Gillis, W. (2015). Police push back on Ontario's proposed carding regulations. *Toronto Star*, November 7, 2015.

<sup>9</sup> African Canadian Legal Clinic, Campaign to Stop Police Carding, Canadian Civil Liberties Association et al, 17.