



CORNWALL POLICE SERVICE BOARD REPORT



TO: Board Members FROM: Chief Shawna Spowart

UNIT/BUREAU: Cornwall Police Service Board UNIT/BUREAU: Executive Services

DATE: March 26, 2025

Collection of Identifying Information in Certain Circumstances (CIICC) 2024 Audit Report

Objective:

The objective of this report is to provide the Police Service Board with a Summary Report with respect to the Collection of Identifying Information in Certain Circumstances (CIICC) Function for the 2024 Calendar Year. This report is to ensure compliance with Ontario Regulation 400/023 of the Community Safety and Policing Act (CSPA)

Background:

In July of 2016, the Ministry of Community Safety and Correctional Services introduced new legislation that changed the process by which police officers proceed in the “Collection of Identifying Information in Certain Circumstances (CIICC)”. This process was formerly known to our service as a “Street Check”. This legislation was to be implemented by all Police Services by January 1, 2017.

The objective of the legislation was to ensure that the rights of the individual are protected, that Police Officers are using lawful authorities when attempting to identify individuals, and that no particular group or combination of groups are deliberately being targeted based on their sex, age, ethnicity or geographical location.

The legislation requires that the Police Chief provide the Police Service Board with an annual report under O. Reg 400/23 of the CSPA. The report must identify if the Police Service complies with the CIICC legislation and if not, what corrective actions will be taken by the Police Chief to address the identified issues.

General Findings:

1. The procedures outlined in Cornwall Police Service (CPS) Directive FOB115 ensures that we are compliant with the Collection of Identifying Information in Certain Circumstances (CIICC) Legislation.

Description
<p>The Police Service must have a written directive governing procedures for assuring compliance with all applicable constitutional requirements, including:</p> <p>a) Interview (including Field Interviews)</p>

2. The following positions within the CPS are authorized to be regulated Interaction Verifiers:
 1. Inspectors
 2. Staff Sergeants
 3. Sergeants
 4. Intelligence officer
 5. Records Supervisor

The Inspector of Administrative Operations is designated as the Lead Verifier and Auditor of the CIICC Process.

3. The CPS process for CIICC reporting is as follows;
 1. Prior to the end of their tour of duty, a police officer shall submit the CIICC Report in Niche RMS with the occurrence type identified as a Routine Traffic Stop.
 2. The Supervisor is to approve the report within 7 days of submission and determine if the report meets the threshold of a CIICC report or if the report should be deemed as an Intelligence Report. The OIC must determine if the report includes all relevant information before approving it in Niche RMS.
 3. The Inspector of Administrative Operations is to update the CIICC Excel Spreadsheet during the first week of the month for the data from the previous month. A DMS task has been created with monthly diary dates to ensure that this practice is being completed.
 4. The Inspector of Administrative Operations will complete the verification of each Routine Traffic Stop to determine if the entries are CIICC compliant.
 5. The Inspector of Administrative Operations will advise the Records Bureau Supervisor should any Routine Traffic Stop be determined as non-compliant so that the information can be retained in a restricted access database. Access to these reports must be requested in

writing and is generally only granted to the Auditor for final assessment and annual reporting functions. The Records Bureau Supervisor will maintain an access log for mandatory reporting under the legislation.

6. The access log will contain the following information:
 - a) number of times that a determination indicating that the police officer did not comply with the obligations under Section 6 and the data was retained in the restricted access database.
 - b) the number of times, if any, members of the police service were permitted to access identifying information to which access must be restricted by virtue of one or more of the following:
 - i) for the purpose of an ongoing police investigation,
 - ii) in connection with legal proceedings or anticipated legal proceedings,
 - iii) for the purpose of dealing with a complaint under Part X of the CSPA
 - iv) in order to prepare the annual report or a report required due to disproportionate collection
 - v) for the purpose of complying with a legal requirement, or
 - vi) for the purpose of evaluating a police officer's performance.
 - c) The Records Bureau Supervisor must provide the Inspector of Administrative Operations with a written memo at year-end advising if any Freedom of Information Requests were received regarding any CIICC Interaction for the previous Calendar Year. A DMS task has been created to ensure compliance with this requirement.
 - d) The Professional Standards Bureau must provide the Inspector of Administrative Operations with a written memo at year-end advising if any complaints were received regarding any CIICC Interaction for the previous Calendar Year. A DMS task has been created to ensure compliance with this requirement.
 - e) The Training Sergeant will provide in-service training as required via block training. All Sergeants will provide updates and training to their respective teams at shift briefings. Power DMS is utilized to assign training to any police service member that requires training related to legislative updates.
 - f) The Inspector of Administrative Operations provides the Deputy Chief of Police with a written audit report on the CIICC Function by the end of March for the previous Calendar Year.

Under this legislation, the Chief of Police must establish the age groups to be considered relevant to this report. The following age groups have been established according to the 2021 Census Data from Stats Canada for the City of Cornwall (not Census Agglomeration):

Youth	Adult
0-14	20-29
15-19	30-39
	40-49
	50-59
	60-69
	70-79
	80-89
	90-100
	Over 100

Under this legislation, the Chief of Police must establish a list of racialized groups to be considered relevant to this report. The following demographics have been established based on the 2021 Census Data from Stats Canada for the City of Cornwall (not Census Agglomeration):

Ethnicity	Additional Description
Aboriginal	First Nations (North American Indian), Métis, or Inuk (Inuit)
South Asian	East Indian, Pakistani, Sri Lankan, etc...
Chinese	N/A
Black	N/A
Filipino	N/A
Latin American	N/A
Arab	N/A
Southeast Asian	Vietnamese, Cambodian, Laotian, Thai, etc....
West Asian	Afghan, Iranian, etc...
Korean	N/A
Japanese	N/A
Visible Minority, n.i.e	The abbreviation n.i.e. means not included elsewhere, ie. Pacific Islander, Polynesian, Tibetan

In February 2025, review of the CIICC Process and the Routine Traffic Stop reports on Niche RMS was conducted. During the 2024 Calendar Year, refresher training was provided through DMS to all CPS police officers and special constables as required by the CSPA. This refresher training is required every 36 months as per O. Reg 400/23 of the CSPA. The training was assigned, delivered and tracked using DMS and the Inspector of Administrative Operations has confirmed that all CPS members who were assigned the training have completed the training.

Specific Findings:

A review of the 2024 Routine Traffic Stop reports in DMS resulted in 214 calls for service related to CIICC, the statistics were captured in quarterly breakdown. The chart below captures the following statistical data for each Quarter:

Quarterly Totals	Number of Reports	%	CIICC Reports	Intelligence Reports	%	Investigative Stops	%
1 st Quarter	33	16	0	20	22	13	11
2 nd Quarter	38	18	0	25	28	13	11
3 rd Quarter	109	51	0	21	23	88	72
4 th Quarter	31	15	0	24	27	7	6
Totals	211	100	0	90	100	121	100

Analysis of the information revealed the following statistical data relative to each Patrol Zone:

All Zones	Number of Reports	%
Zone 1	80	38
Zone 2	43	20
Zone 3	28	13
Zone 4	40	19
Zone 5	16	8
Zone 6	4	2
Totals	211	100

The Zone Data would show that most of the Routine Traffic Stops and Investigative Stops occurred within Zone 1, Zone 2 and Zone 4. This information would seem to be consistent with known drugs houses, motels used for Human Trafficking and the locations of heavy traffic volume.

In July of 2024, the CPS began creating a call for service each time an officer conducted a traffic stop, this created an increase in the number of Routine Traffic Stop calls for service. The nature of these calls for service resulted in some data related to interactions such as age, gender, and ethnicity with the driver and or any passengers not captured in a report. Of the 337 people who police had interaction with during Routine Traffic Stops in 2024, there were 40 individuals (11.9%) of the total number of interactions with no identifying information obtained.

A review of the Stats Canada Data Base would reveal the following information based on the Age Demographics established from the 2021 Census Data from Stats Canada for the City of Cornwall (not Census Agglomeration):

Total	Population 47845	% 100	Population Male	% Male	Total % Male	Population Female	% Female	Total % Female
Youth								
0-14	7,505	15.69	3,815	16.5	8.0	3,690	14.9	7.8
15-19	2,325	4.86	1,170	5.0	2.4	1,155	4.7	2.4

Adults								
20-29	5,450	11.39	2,815	12.2	5.9	2,635	10.6	5.5
30-39	5,515	11.53	2,715	11.8	5.7	2,800	11.3	5.8
40-49	4,935	10.31	2,395	10.3	5.0	2,540	10.2	5.4
50-59	6,175	12.90	2,995	13.0	6.2	3,180	12.8	6.7
60-69	7,140	14.93	3,385	14.7	7.1	3,755	15.1	7.8
70-79	5,335	11.15	2,470	10.8	5.2	2,865	11.5	6.0
80-90	2,750	5.75	1,110	4.9	2.3	1,640	6.6	3.4
90-100	680	1.42	180	0.8	0.4	500	2.0	1.0
100–over	35	0.07	10	≥ 0	≥ 0	25	≥ 1	≥ 1
Totals	47,845	100	23,060	100	48.2	24,785	100	51.8

The Stats Canada Website automatically rounds their figures to end in a 5 or a 0 in order to protect the identity of the clients they serve. This process accounts for the slight variation in totals and percentages.

A review of the Stats Canada Data Base would reveal the following information based on the Ethnicity Demographics established from the 2021 Census Data from Stats Canada for the City of Cornwall (not Census Agglomeration):

Total	Population	%	Population Male	% Male	Total % Male	Population Female	% Female	Total % Female
47,845			23,060			24,785		
Aboriginal	2,720	5.7	1,255	17.3	5.4	1,465	20.2	5.2
South Asian	2,360	4.9	1,245	17.2	5.4	1,115	15.4	4.5
Chinese	165	0.3	100	1.4	0.4	65	0.9	0.3
Black	775	1.6	380	5.2	1.6	395	5.5	1.6
Filipino	300	0.6	125	1.7	0.5	175	2.4	0.7
Latin American	240	0.5	105	1.5	0.5	130	1.8	0.5
Arab	240	0.5	150	2.1	0.6	90	1.2	0.4
Southeast Asian	165	0.3	85	1.2	0.4	80	1.1	0.3
West Asian	160	0.3	70	1.0	0.3	90	1.2	0.4
Korean	50	0.1	25	0.3	0.1	25	0.3	0.1
Japanese	30	0.1	15	0.2	0.1	15	0.2	0.1
Not Visible Minority	35	0.1	25	0.3	0.1	15	0.2	0.1
Total	7,240	15.0	3,580	49.4	14.9	3,655	50.3	14.2

The Stats Canada Website automatically rounds their figures to end in a 5 or a 0 in order to protect the identity of the clients they serve. This process accounts for the slight variation in totals and percentages.

From the databases above and the data obtained by the Lead Regulated Interaction Verifier, the following information can be determined:

#	Information Description	Total Occurred
1	Number of Attempted Collections	0
2	Number of Attempts that resulted in Information being collected	0
3	Number of Individuals from which information was collected	0
4	Number of times the subject was advised of his/her rights not to provide information	0
5	If not advised, what reason was used: <ol style="list-style-type: none"> 1. Might compromise the safety of an individual 2. Would likely compromise an ongoing police investigation 3. Might allow a confidential informant to be identified 4. Might disclose the identity of a person contrary to law, including the YCJA 	n/a n/a n/a n/a
6	Number of times the subject was not given a receipt: <ol style="list-style-type: none"> 1. The individual indicated they did not want it / declined it 2. Might Compromise the Safety of an individual 3. Might delay the officer from responding to another matter that should be responded to immediately 	0 0 0
7	Number of attempted collections based on the sex of the individual: <ol style="list-style-type: none"> 1. Male 2. Female 	0 0
8	Number of attempted collections based on Age:	
	Youth	
	0-14	0
	15-19	0
	Adult	
	20-29	0
	30-39	0
	40-49	0
	50-59	0
	60-69	0
	70-79	0
	80-89	0
	90-99	0
	Over 100	0

#	Information Description	Total Occurred
9	Number of attempted collections based on Ethnicity	
	Aboriginal - First Nations - (North American Indian), Métis, or Inuk (Inuit)	0
	South Asian – East Indian, Pakistani, Sri Lankan, etc...	0
	Chinese	0
	Black	0
	Filipino	0
	Latin American	0
	Arab	0
	Southeast Asian – Cambodian, Laotian, Thai, etc...	0
	West Asian – Afghan, Iranian, etc....	0
	Korean	0
	Japanese	0
	Visible Minority, n.i.e - The abbreviation n.i.e. means not included elsewhere, i.e. Pacific Islander, Polynesian, Tibetan	0
10	Analysis of the Information Collected	
	Information Collected from Visible Minority	0
	Information Collected from Non-Visible Minorities	0
	Information Collected from Youth	0
	Information Collected from Adults	0
11	Number of Patrol Zones the Information was collected from:	0
12	The number of times it was determined that the information did not comply with the obligations under Section 6 and the data was retained in a restricted access database	0
13	The number of times access was granted to the restricted Database	0
	1. For the purpose of an ongoing police investigation	n/a
	2. In connection with legal proceedings or anticipated legal proceedings.	n/a
	3. For the purpose of dealing with a complaint under Part V of the Act or for the purpose of an investigation or inquiry under clause 25(1)(a) of the Act.	n/a
	4. In order to prepare the Annual Report or a report required to be to disproportionate collection (under section 15 of the Regulation)	n/a
	5. For the purpose of complying with a legal requirement	n/a
14	6. For the purpose of evaluating a police officer's performance	n/a
	The number of complaints (public and Chief's) resulting from or related to Regulated interactions along with their status or outcome	0
	Complaint Status	n/a
	Complaint Outcome	n/a
15	The number of Municipal Freedom of Information and the Protection of Privacy requests relating to Regulated Interactions	0

The CPS has deployed body worn cameras to all frontline officers that will capture every interaction with the public on a Routine Traffic Stop investigation. The data is stored on the AXON platform and if required data related to age, gender, and ethnicity with the driver and or any passengers may be determined upon review of the incident via Axon.

From the information provided, we can determine that CPS officers were compliant with the legislation and no one section of our population was deliberately targeted in 2024.

The following recommendations were implemented as a result of this audit:

1. Utilize Power DMS to create monthly workflows for Quality Assurance to ensure that timely review of RMS calls for service related to Routine Traffic Stops are reviewed and data is captured in the annual Excel spreadsheet.
2. Implement a category on Niche RMS of "Field Intelligence Report" as an occurrence type. This will assist in categorizing the report type for this audit process.
3. Utilize the Axon database to identify any data related to age, gender, and ethnicity with the driver and or any passengers if the need arises for this audit process.

Funding Requirements:

N/A

Communications:

In accordance with Section 16(3)(a) of O. Reg 400/23, the Board shall, upon receipt of this report, publish the report on the internet in a manner that makes it available to the public free of charge and may make the report available to the public free of charge in any other manner that the police service board considers appropriate.

Recommendations:

The following recommendations are being made pursuant to the 2024 audit report:

1. I recommend that the Service continue to provide all relevant staff members with the required training pursuant to the CSPA and its regulations.
2. It is recommended that the Board publish this report on its webpage in accordance with the CSPA and its regulations.
3. I recommend that the Board receive this report.

Respectfully submitted,



Shawna Spowart
Chief of Police