



Bias-Based Profiling Administrative Review

Calendar Year (CY) 2025 Annual Administrative Review

Date of Review: June 8, 2026

Review Period: CY2025

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Distribution: AVC/Chief, Deputy Chief, DU Campus Community and CALEA

CALEA STANDARD 1.2.8c

1.2.8c Bias-Based Profiling

The agency has a written directive governing bias-based profiling and, at a minimum, includes the following provisions:

- a. a prohibition against bias-based profiling;*
- b. initial training and annual training for affected personnel in biased issues including legal aspects; and*
- c. a documented annual administrative review of agency practices including citizen concerns and any corrective measures taken.*

OVERVIEW

The purpose of this report is to review the Department of Campus Safety's (DCS) practices to ensure we are upholding our commitment to prohibiting bias-based profiling.

The Department Bias Based Profiling written directive states:

- A. All DCS personnel shall conduct themselves in a respectful, responsible, and professional manner and perform their duties without unlawful regard to race, color, national origin/ancestry, age, religion/creed, disability, sex, sexual orientation, gender identity, gender expression, pregnancy, marital status, genetic information or veteran/military status.*
- B. CSOs (Campus Safety Officers) shall conduct patrols in a proactive, prevention-orientated and visible manner; investigate suspicious persons or circumstances; actively enforce University Policies and Procedures, Department directives; and safeguard established laws. Bias Based profiling by CSOs during field contacts, field interviews, other investigative efforts, detentions, and any enforcement action is unacceptable and prohibited.*

The Department of Campus Safety is committed to ensuring all members of the community we serve are treated fairly and without bias in accordance with the law, Department directives and University policies.

DEPARTMENT OF CAMPUS SAFETY WRITTEN DIRECTIVE REVIEW

The Department of Campus Safety's written directive on Bias Based Profiling contains direction and expectations that place the Department in compliance with applicable laws and meets the Department's CALEA accreditation requirements.

I conducted a review of the written directive and am making the following recommendations for revision:

- Update the Office of Equal Opportunity and Title IX title to the Office of Civil Rights and Equal Opportunity (CREO).
- Update section C.iv to align with WD Internal Affairs since CREO investigate these types of complaints.
- Consider removal of section C.iii.b since these complaints should be forwarded directly to CREO with a copy to Internal Affairs.
- Update section D.i to remove sub-bullets B and D. CREO is the office at DU responsible for these investigations. HRIC would only be involved in employee to employee disputes, however, CREO would still have responsibility for the investigation.

STATISTICAL DATA AND REVIEW

There are several areas to consider when evaluating bias-based profiling. These include, but are not limited to, complaints, enforcement actions, and use of force.

Complaints:

In CY2025, there were 3 citizen complaints that alleged bias-based profiling involving a DCS employee. In each case, there were no findings made against the employees. There was also one internal employee complaint made alleging discrimination with no finding made.

Citizen Complaint

CATEGORY	2023	2024	2025
Bias-Based Profiling	0	0	3

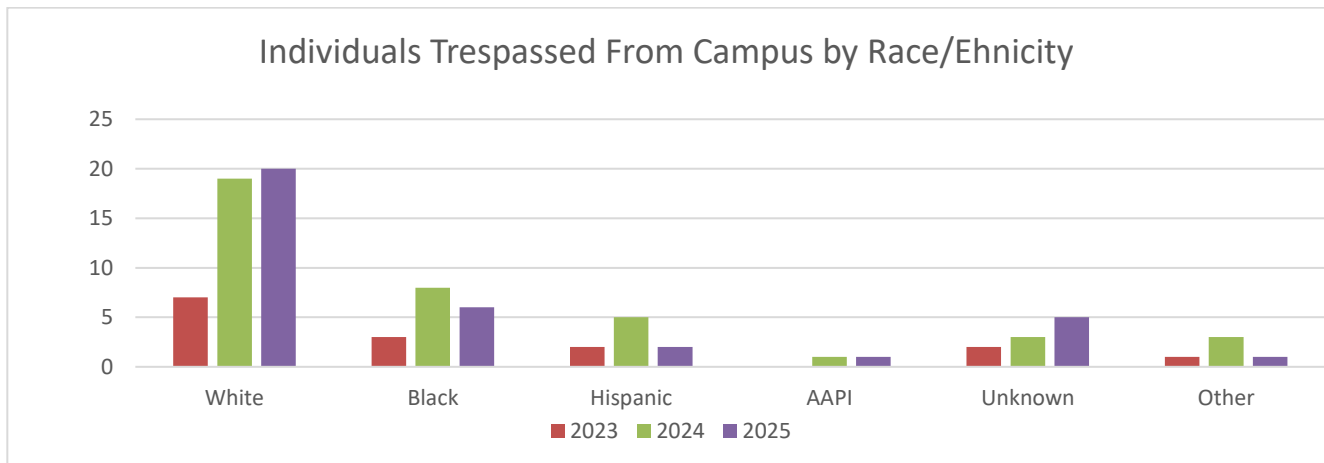
Internal Employee Complaint

CATEGORY	2023	2024	2025
Discrimination Based	0	0	1

Trespasses:

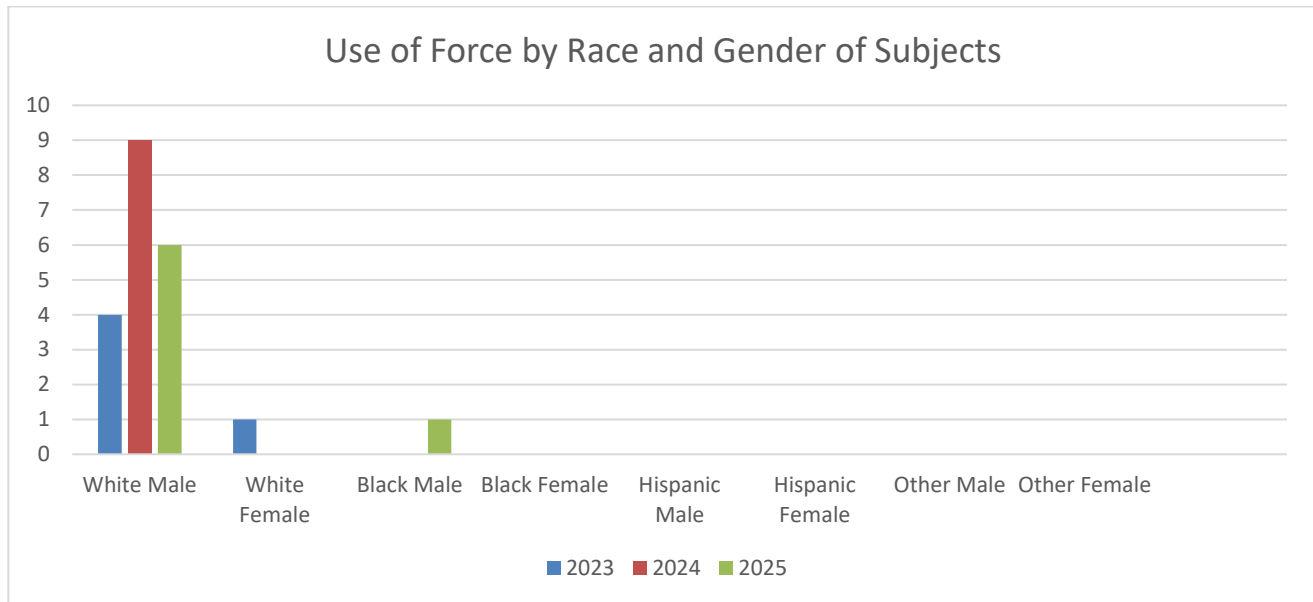
As a method to determine if our Department’s practices are resulting in bias towards any race or ethnicity, data were pulled for all individuals that were trespassed from campus to determine their race and ethnicity for comparison. It should be noted that an individual may be trespassed from campus for numerous reasons. Trespasses may occur because of a call for service where a crime occurred, an officer-initiated contact or a Student Rights and Responsibilities (SRR) action.

The chart below identifies individuals trespassed from campus in 2023, 2024 and 2025 without regard for the reason they were trespassed or if the contact was made due to a call for service, officer-initiated, or SRR action. The data show relative consistency in the race/ethnicity of individuals being trespassed consistent with the demographics of Denver.



Use of Force Data:

As part of the Department's Use of Force Analysis, we reviewed trends with consideration to the race and gender of individuals involved in a use of force. That data is shown here for 2023, 2024, and 2025 for additional transparency. The Use of Force Analysis did not identify any concerns that uses of force were based on an individual's race or gender.



TRAINING ON BIAS-BASED PROFILING

All DCS Campus Safety Officers receive initial training upon hire and annual training thereafter in proper proactive enforcement strategies and bias-based profiling issues including legal aspects and a review of the Department's Bias Based Profiling written directive.

There are no identified training needs based on this administrative review.

COMMUNITY EDUCATION AND AWARENESS

The Department provides the Campus Community and general public with an informational brochure on bias-based profiling. This information can be accessed via the Department's website: <https://www.du.edu/campussafety/statistics-directives-research>. A copy of the most recent annual Bias-Based Profiling Administrative Review is also made available on that website.

The brochure was reviewed and found to have the following issues that should be updated:

- Outdated office names, including both the Division of Campus Safety and the Office of Equal Opportunity and Title IX
- Outdated links including:
 - [du.edu/campussafety/reports](https://www.du.edu/campussafety/reports)
 - [du.edu/campussafety/complaints/](https://www.du.edu/campussafety/complaints/)
 - [du.edu/humanresources](https://www.du.edu/humanresources)

CONCLUSION

Although there were multiple bias-based complaints made against employees, the lack of any findings being made against the employees is a positive sign that our actions are not motivated by bias. This is reinforced by both the trespass and use of force data.

Both the Department's Bias Based Profiling written directive and brochure are a little outdated and should be revised in the coming months.