



Written Directive	Bias Based Profiling
Effective Date: October 6, 2021	Applies to: All
CALEA: 1.2.8	Issuing Authority: Director Michael Bunker
Revised: October 6, 2021	Rescinds: June 5, 2020

I. Purpose

The purpose of this written directive is to explicitly prohibit the action of bias based profiling from Department of Campus Safety (DCS) personnel and to reinforce established directive and procedures that ensure confidence and mutual trust between the Department, the University and the Campus Community by providing services in a fair and equitable fashion. This directive provides guidelines to the Department's Campus Safety Officers (CSOs) as a proactive measure to prevent occurrences of bias based profiling in the performance of their official duties.

Discussion: It is through pro-active patrol and investigative techniques that CSOs reduce the opportunities for violations of University policies/procedures or crime to occur and contribute to making the campus a safer environment for the campus community the Department serves. This directive is intended to assist CSOs in accomplishing this mission in a manner that respects the rights and dignity of all individuals

II. Definitions

Bias: A prejudice in favor of or against an individual, thing, or group compared to another, usually in a manner considered to be inequitable, unjust and unfair.

Bias Based Profiling: The selection of an individual for an initiated contact, detention, or enforcement action, based solely on a trait common to a group of individuals rather than on the individual's conduct or behavior or information that potentially identifies the individual as having engaged in criminal activity or activity related to a violation of University Policy/Procedure.

Trait: For the purposes of this directive, trait includes, but is not limited 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.

Biased Practices: The unequal treatment of any individual based solely on their perceived inclusion into a particular group, including, but not limited 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.

Campus Safety Officer: Any individual employed by the University of Denver's Department of Campus Safety and licensed security personnel through the City and County of Denver.



III. Written Directives

- 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 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. [CALEA 1.2.8a]

IV. References

WD Searches

WD Detaining of Individuals

WD Use of Force

V. Rules and Procedures

A. Prohibitions: [CALEA 1.2.8a]

- i. CSOs shall not use bias-based profiling to initiate contact with any individual(s), including those under unusual or suspicious circumstances; individual(s) viewed as suspects and/or potential suspects in criminal activities; or actual or potential violators of University Policy/Procedures.
- ii. CSOs may take into account the reported physical description and/or traits, as defined by this directive, of a specific suspect or suspects based on relevant information that links the person or group to a particular reported or observed University policy/procedure violation or criminal incident; or, when it is necessary to communicate the physical description or trait of the individual to others in the performance of an official duty.
- iii. Individuals shall only be stopped or detained in accordance with established Department directive and procedures. Detaining an individual and/or inquiring into their activities based solely on a specific trait or bias as defined by this directive, is considered prohibited bias-based profiling. Examples include, but are not limited to the following:
 - a. Detaining a driver of a vehicle solely based on the determination that an individual of a certain trait is unlikely to own or possess that specific make or model of vehicle.
 - b. Detaining an individual solely based on the determination that an individual of a certain trait does not belong in a specific geographic area, location or place.

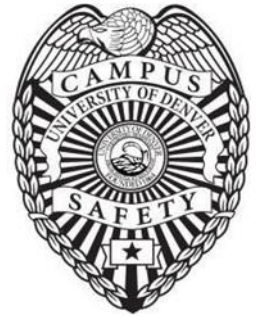
B. Training: [CALEA 1.2.8b]

- i. All Campus Safety Officers will receive initial and annual training thereafter in proactive enforcement tactics and bias-based profiling issues, which includes legal aspects and a review of applicable Department directives.
- ii. Training will stress the need to respect the rights of all individuals and topics should include, but not be limited to, field contacts, search issues, interview techniques, cultural diversity, courtesy, discrimination, and interpersonal communication



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skills.

- iii. Training should emphasize the corrosive effects of bias based profiling on individuals, the campus community, the Department and the University.
- iv. Training may be accomplished with the assistance of advocacy groups that represent viewpoints of communities that have traditionally had adversarial relationships with public safety or campus safety/security professions.

C. Complaints: [CALEA 25.1.1]

- i. Any individual may file a complaint if they feel they have been the subject of bias-based profiling incident involving DCS Campus Safety Officer as defined by this directive. A complaint may be filed:
 - a. Directly with DCS through the Department's employee complaint intake process.
 - b. Directly with the University's Human Resources and Inclusive Community; or,
 - c. Directly with the University's Office of Equal Opportunity and Title IX
- ii. No individual shall be discouraged, intimidated or coerced from filing such a complaint, or discriminated against because of having filed such a complaint. Threat of retaliation or retaliatory acts against an individual for filing such a complaint or expressing the desire to do so will not be condoned and is strictly prohibited.
- iii. Any DCS employee contacted by an individual who expressly states a desire to file a complaint of this nature, shall provide the individual with detailed information on the complaint process.
 - a. If a complainant requests to speak with a supervisor at the time of the complaint being filed, DCS shall make every effort to assist the complainant in contacting the on-duty shift supervisor.
 - 1. If the complainant does not want to speak with a supervisor at that time, the DCS employee shall take the complainant's name and contact information if they wish to provide to be contacted at a later time.
 - 2. The DCS employee will report the contact to their supervisor at the earliest opportunity, but prior to the end of their shift.
 - b. Any supervisor receiving such a complaint shall make every reasonable effort to contact the complainant and conduct an initial inquiry into the incident. The supervisor will then follow the established Department's directives associated with the complaint process.
- iv. A Complaint of Bias-Based profiling against a Campus Safety personnel will be documented, reviewed and investigated by the Department of Campus Safety; the University's Human Resources Inclusive Community; or the University's Office of Equal Opportunity & Title IX, depending on the manner in which the complaint was reported or the circumstances surrounding the allegation.

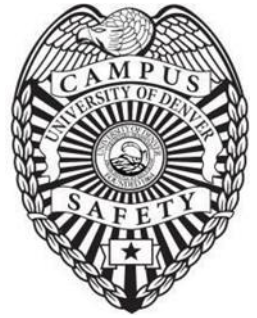
D. Annual Reporting: [CALEA 1.2.8c]

- i. The Department of Campus Safety's Special Support Services will be responsible for a documented annual administrative review of all the Department's Bias-Based profiling complaints for the year, regardless of disposition. This data is collected from the following University of Denver Departments:
 - a. Department of Campus Safety
 - b. Human Resources and Inclusive Community (HRIC)



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- c. Office of Equal Opportunity and Title IX
 - d. Inclusion & Equity Education
- ii. This review includes statistical data only and names or other personal identifiers of individuals involved in a complaint of this nature is not included.
 - iii. This administrative review will include an examination of the Department's directive, procedures, practices and training in the area of Bias-Based Profiling. The review may include any concerns, including concerns from the campus community, regarding these topics and any corrective measures, if any, that were taken.

E. Community Education and Awareness

- i. DCS personnel who appear in public should attempt to educate the community regarding the Department's prohibition against bias-based profiling.
- ii. Brochures and literature, to the extent practical, should contain a statement indicating that the Department follows a "Community Oriented and Bias-Free policing model."
- iii. To further promote community education and awareness, this directive shall be made available to the campus community and general public, via the Department's website.