



Bias-Based Profiling Administrative Review

Calendar Year (CY) 2021 Annual Administrative Review

Date of Review: June 8, 2022

Review Period: CY2021

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Distribution: Director, Associate Director, Patrol Captain, 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 DIRECTIVES

The Department of Campus Safety's written Directives contain direction and expectations that place the Department in compliance with applicable laws, the Department's CALEA accreditation which adheres to best industry practices, and the expectations of the community we serve. These directives include:

- WD Bias Based Profiling**
- WD Detentions and Arrests**
- WD Field Interviews**
- WD Internal Affairs**
- WD Searches**
- WD Trespass**
- WD Use of Force**

The Department reviews these specific directives on an annual basis to determine if any revisions are necessary. Revisions to all written directives are made available to DCS personnel through the Department’s PowerDMS document management system. Additionally, the Department’s Campus Safety Officers are provided annual training that includes a review of applicable directives related to Bias-Based profiling.

STATISTICAL DATA AND REVIEW

There are several areas to consider when evaluating bias-based profiling. These include, but are not limited to, enforcement actions, complaints from citizens, and training provided to DCS personnel.

Complaints:

The department accepts all complaints, to include anonymous complaints. Complaints that allege bias as a motivation are generally sent to the University’s Office of Equal Opportunity and Title IX for investigation. In CY2021, there were no complaints that alleged bias-based profiling for any DCS employee.

Citizen Complaint

CATEGORY	2019	2020	2021
Bias-Based Profiling	0	1	0

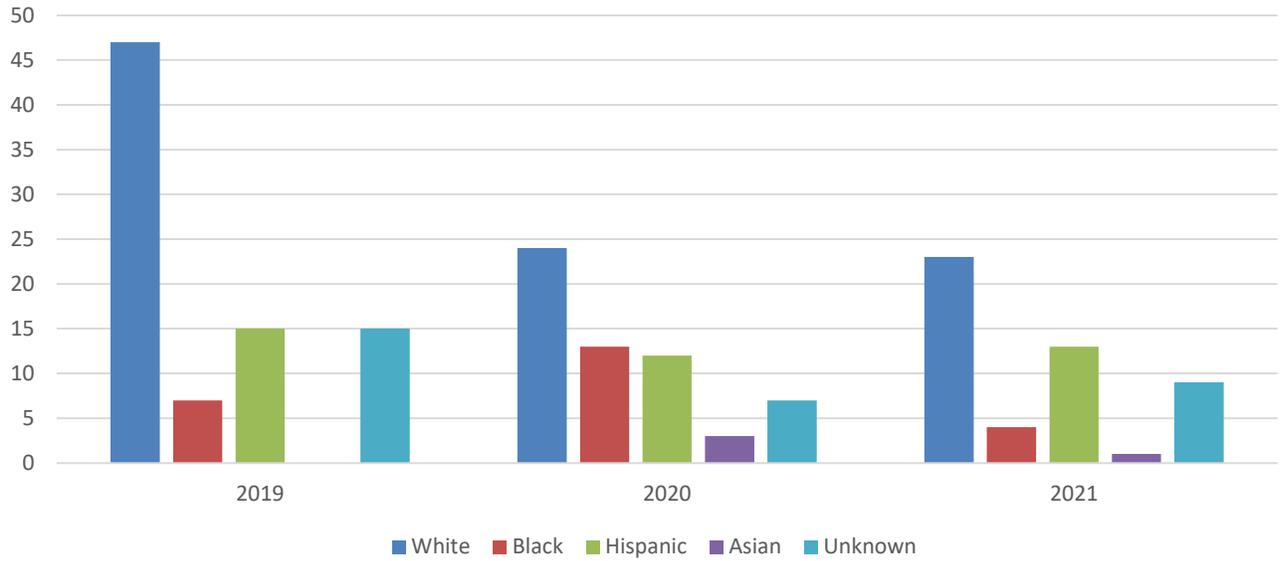
Internal Employee Complaint

CATEGORY	2019	2020	2021
Bias-Based Profiling	0	0	0

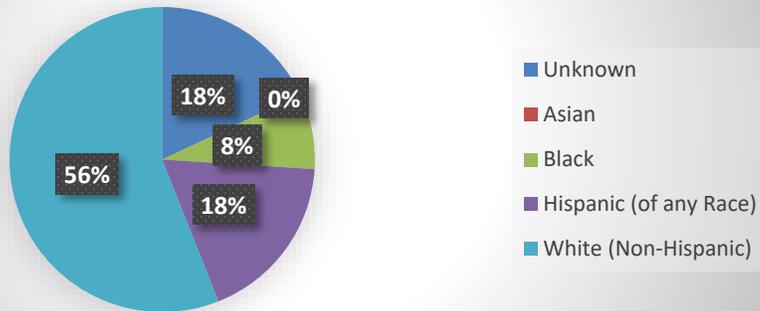
Trespasses

As a method to determine if our Department’s practices are resulting in bias towards any race or ethnicity, data was pulled for all individuals that were trespassed from campus to determine their race and ethnicity for comparison. It should be noted that an individual from campus may be trespassed from campus for numerous reasons. Trespasses may occur because of a call for service where a crime occurred or from an officer-initiated contact. The charts below identify individuals trespassed from campus in 2019, 2020, and 2021 without regard for the reason they were trespassed or if the contact was made due to a call for service or if it was officer-initiated. The data show relative consistency in the race/ethnicity of individuals being trespassed. Due to limitations on how this data is able to be pulled from our Records Management System, we are unable to further break down this information into whether the individual was affiliated with the University.

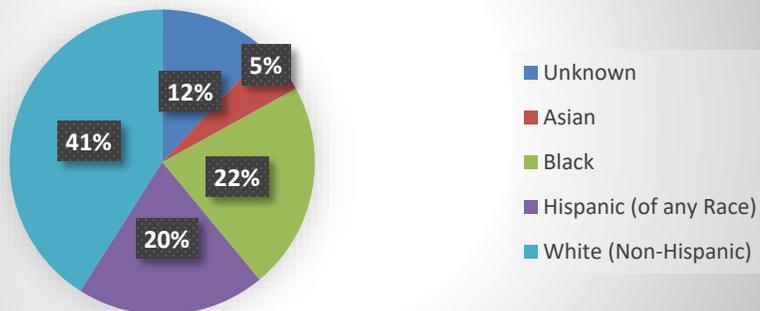
Individuals Trespassed from Campus by Race/Ethnicity

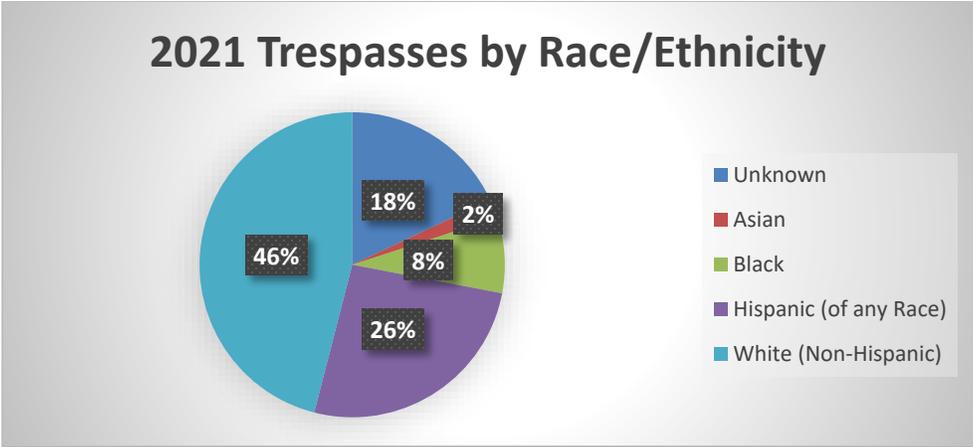


2019 Trespasses by Race/Ethnicity



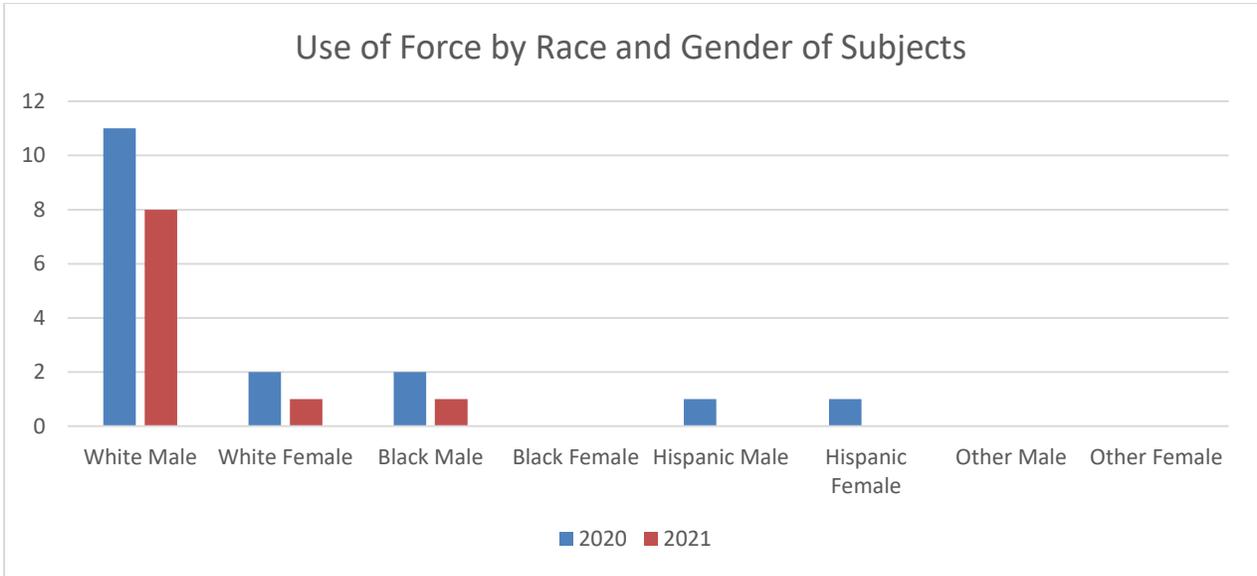
2020 Trespasses by Race/Ethnicity





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 2020 and 2021 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, which includes legal aspects and a review of applicable Department directives. Department training stresses the need to respect the rights of all individuals and emphasizes the corrosive effects of bias-based profiling on individuals, the campus community, the Department and the University.

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>

CONCLUSION

There continue to be no indications Department employee are motivated by bias when interacting with the campus community and general public. There were no corrective actions taken in 2021 related to bias-based profiling.

All associated Department directives were reviewed, and the only consideration for potential change would be to current policy surrounding field contact cards. This policy was instituted in 2019, and there was not enough relevant data in 2021 to continue to incorporate these contacts into this administrative review. A decision will need to be made if field contact cards are necessary for our Department, and if so, the best approach to using them effectively.