

Collaborative for a Safe, Fair, and Just Cleveland
 WORKING DRAFT - List of Reforms –
 (Updated 2-18-15)

The mission of the Collaborative for Safe, Fair, and Just Cleveland (CSFFJC) is to be an equal partner:

- *in efforts to craft and implement comprehensive and sustainable reform of the patterns and practices of the city’s criminal justice system relating to the excessive use of force in its policing and other interventions with the community;*
- *to represent a broad range of community perspectives through a collaborative stakeholder commission;*
- *to reach out and engage communities directly;*
- *to get critical feedback; to recommend changes to policing policies and practices;*
- *to help participate in the implementation of those changes;*
- *to give individual community members and groups a voice and stake in any reform efforts;*
- *to foster ongoing dialogue about police practices with community members;*
- *to help build trust and strengthen community-police relations and*
- *to provide long-term community perspective on the effectiveness of policies, programs and efforts to implement the reforms adopted as a result of the agreements reached by the principals.*

DRAFT List of Reforms:

Cleveland Div. of Police Reforms	
Subject	Summary
1. Community and Stakeholder Participation in Decision-Making	<p>Community stakeholders have a seat at the negotiating and decision-making table when it comes to key aspects of police reform from the consent decree to implementation and sustainability of reforms.</p> <p>Ex: Seattle Community Policing Commission – Citizen Commission on community engagement in the reform process and sustainability</p> <p>Ex: Cincinnati United Black Front Collaborative</p> <p>Community Stakeholder group recognized and formalized in the contents of the consent decree and the memorandum of understanding (MOU).</p>

<p>2. Preservation of Life</p>	<p>Establish, clarify and enforce policies on preservation of life as the highest value.</p> <p>Clarify CDP policy on providing first aid; adopt best practice policy and training on administration of first aid.</p> <p>Review and adopt best practice policies on the preservation of life.</p>
<p>3. Use of Force</p>	<p>Comprehensive Revision of “Use of Force” Policies.</p> <p>Mandatory de-escalation training for all officers.</p> <p>Officers should use de-escalation techniques, when appropriate and feasible, in order to reduce the need for force.</p> <p>Adopt best-practices in terms of UOF policies that clearly define all uses of force (including sexual contact) and prohibit unnecessary uses of force. (Seattle, New Orleans as possible model policies)</p> <p>Force continuum and instrument/modality-specific model</p> <p>Prohibit use of deadly force on fleeing subjects in accordance with <i>Tennessee v. Garner</i></p> <p>Consider international best-practices related to “shoot to disable” tactics; increase marksmanship training requirements for patrol officers.</p> <p>Adopt appropriate use of force procedures that take into account the mental condition and possible disabilities of subject; e.g. deaf subjects; autistic subjects; people in mental crisis; frail or elderly; obese people, etc.</p> <p>Prohibit use of force including CED (conducted energy device) application on restrained individuals</p> <p>Regular training on 4th Amendment Issues</p> <p>Mandatory CIT training for all officers</p> <p>All Training materials, names of trainers, and frequency of training made public</p> <p>Adopt zero tolerance for abusive language/actions</p> <p>Adopt a policy for soliciting subjects reporting on use of force</p>

	<p>during arrest at booking [detailed stand-alone memo on booking and court procedures to be incorporated in future updates to working draft]</p> <p>Use of force policy should include clause stating that “unreasonable use of force will subject officers to discipline, possible criminal prosecution and/or civil liability.”</p>
<p>4. Reporting on Use of Force</p>	<p>Use of Force Reporting – comprehensive policy of the collection, analysis, and public reporting on all incidents involving force.</p> <p>Use of Force reporting policy should follow best practice models, for example, use of force reporting procedures as outlined in New Orleans Consent Decree of 7/24/13.</p> <p>Develop and implement a uniform reporting system, using uniform “supervisor Use of Force Report”; Force divided into levels with specific reporting requirements per level.</p> <p>Officers who use or observe force notify supervisors immediately following any use of force incident. Officers who use or observe force and do not report shall be subject to disciplinary action, up to and including termination.</p> <p>Supervisors that fail to take immediate action or comply with reporting policy following any use of force incident shall be subject to disciplinary action.</p> <p>Force Investigation Teams (FIT) must investigate all uses of force fully and fairly. FIT teams must have appropriate expertise, independence, and investigative skills to ensure that all uses of force that are contrary to law or policy are identified and resolved; FIT teams must carry out their work such that any policy, training, equipment or tactical failures related to UOF are identified and remedied; FIT investigations must be of a high standard of quality such that officers are held accountable for deficiencies and violations.</p> <p>FIT personnel should be trained in criminal and administrative force investigations.</p> <p>FIT teams must be comprised such that conflicts of interest and bias are eliminated (i.e., patrol officers and detectives currently on FIT teams, which can create conflict of interest; currently union representative often arrives before supervisor, if supervisor even arrives on scene at all).</p>

	<p>FIT procedural manual should be made public.</p> <p>Officers involved in a use of force incident must be separated until interviewed; group interviews are prohibited; “no huddling” policy must be enforced.</p> <p>Interviews with officers involved in use of force should be audio/video recorded and preserved.</p> <p>Report rate of force used per arrest by force type, geographic area, type of arrest, age, race, gender, ethnicity; publically issue report annually on use of force wrt to demographics.</p> <p>Publically Issue firearm discharge report annually For every incident where an officer fires a weapon, indicate type of weapon, geographic area, type of arrest, race, ethnicity, religion, national origin, age, gender and disability.</p> <p>Critical incident reporting is timely entered into EIS system to identify trends.</p> <p>Review EIS system per best practices to identify trends and implement necessary action.</p> <p>All officers on scene during use of force must submit written report, explaining type(s) of force, reason for force, identity of all participants and supervisor’s acknowledgement or be subject to disciplinary action.</p> <p>Annual reporting to FBI and to the public on use of force (including lethal and less lethal – determine UOF tier level thresholds for reporting)</p>
<p>5. Stops & Detentions</p>	<p>Revision of investigatory stops, search, seizure, and arrests policies and training, including canine intervention to ensure constitutional compliance.</p> <p>Limit stops or detentions to circumstances where the officers has reasonable suspicion that a crime has taken place or is about to take place.</p> <p>Limit arrests to circumstances where an officer has probable cause to arrest.</p>

	<p>Make policies publically available at police stations, recreation centers, city council offices, public libraries, and on line</p> <p>Require reporting on the issuance of all stop, searches, seizures, arrests and summons issued to individuals highlighting geographic area of issuance, race, ethnicity, age, gender of individual receiving summons</p> <p>Require officers to provide notice and obtain proof of consent to search individuals highlighting geographic area, reason for search, race, ethnicity, religion, national origin, age, gender and disability.</p> <p>Publically issue report every six months.</p> <p>Require officers to explain that a person has the right to refuse a search when there is no warrant or probable cause</p> <p>Require officers to provide specific reason for their law enforcement activity.</p> <p>Require officers to provide document to person with officer's name and information on how to file a complaint at the end of the police encounter.</p> <p>Safety of officer, public, and subject are carefully accounted for during arrest procedures, including cuffing. Handcuffs are deployed such that cuffs are locked at appropriate level of tightness and do not continue to constrict when subject is placed in police vehicle causing "cuffing scars." Position of hands behind back is in a standard position that is low enough so that undue pain, strain, and physical harm are avoided.</p>
6. Bias-Free Policing	<p>Prohibit the profiling based on race, ethnicity, geography, religion, national origin, age, gender identity or expression, sexual orientation, immigration status, disability, and housing status.</p> <p>Development of bias-free policing philosophy, practices, and programs along with high-caliber professional training components that incorporate 21st century topics and strategies in bias-free policing.</p> <p>Bias-free policing philosophy drives engagement with the community as well as internal workings of the division of police.</p> <p>Mandatory FAIP training (Fair and Impartial Policing) training.</p>

	<p>All policies and procedures take into account possible disparate impacts on diverse communities.</p>
7. Community Policing	<p>Development and implementation of a comprehensive and integrated community-policing model which drives recruitment, training, professional development, promotion, etc.</p> <p>Definition and nature of community-policing is provided by the community</p> <p>(e.g., CP does not mean over-policing or surveillance of poor and marginalized communities).</p> <p>Formulation of “neighborhood safety plans” in consultation with impacted communities. Communities work with police to help decide on how their communities will be policed for safety. (Seattle is ostensibly piloting such programs).</p>
8. Community Engagement	<p>Systematic implementation on-going community engagement strategies.</p> <p>Solicit on-going community input on all proposed policing policies and reforms including but not limited to training ad budget to evaluate the effectiveness of reforms.</p> <p>Engagement strategies place high priority on positive engagement with African American communities.</p> <p>Optimization of web-based and IT based communication tools</p> <p>Ramp up use of social media communication tools; web-portals, ongoing surveys, comment boards/lines, feedback loops, etc.</p> <p>Re-orienting of DOJ grants toward community policing rather than enforcement programs that lead to the criminalization of communities of color.</p> <p>Adopt policy to ensure effective communication with all community members regardless of their national origin, ability to speak, read, write, or communicate/understand English.</p>
9. Youth Engagement Programs	<p>Systemic implementation of on-going youth engagement strategies.</p>

	<p>Solicit youth feedback on engagement strategies and reforms to evaluate effectiveness.</p> <p>Systematic engagement of youth in the planning and implementation of programs for youth should be institutionalized.</p> <p>Strategic Youth Engagement Programming Ex: "Second Wave" British model</p>
<p>10. Transparency</p>	<p>Systematic implementation from bottom to top of transparency principles and procedures.</p> <p>Ongoing surveys, comment boards, feedback loops, etc. Posting of all relevant police documents on web-based systems, e.g. General Police Orders, strategic training plans, community policing initiatives, monthly community meeting schedules, budgets, civilian review board and other audit reports, etc.</p> <p>Optimization of web-based and IT based communication tools, surveys, comment lines, etc.</p> <p>Ex. General Police Orders must be published as updated in real time and made available via multiple forms including City website, police stations, public libraries, recreation centers, senior centers, public housing, City Council offices, etc.</p> <p>Ex. Provide comprehensive analysis of budget expenditures and efficiencies on regular basis.</p> <p>Collect data on all arrests, summons, stops, searches and desegregated by demographics and identify reason for stop</p> <p>Report annually on public safety budget</p> <p>All training materials, names of trainers, and frequency of training made public</p>
<p>11. Open Records</p>	<p>Development of a CDP open-records process to require prompt responses to all open-records requests. (comply with Ohio open records laws).</p> <p>City needs to conduct a thorough audit of compliance with open records laws and allocate funds to fix substandard compliance by increasing staff, training, etc. to speed up response time.</p> <p>A culture of transparency should be inculcated City- wide, including within CDP.</p>

<p>12. Civilian Oversight: Revision of Office of Professional Conduct (Independent Civilian Review Board)</p>	<p>Current process is ineffective and lacking in transparency, timeliness, responsiveness, utility.</p> <p>Needs optimization in terms of efficiency, transparency and accountability throughout the process, from intake, investigation, final disposition, and communication to end users.</p> <p>The focus should be on integrity of the process and customer service.</p> <p>Citizen oversight mechanisms (and OPS), etc. must be properly funded and staffed to handle the workload and produce timely results.</p> <p>All complaints/witnesses audio/video recorded.</p> <p>Complaint trends should drive training strategies Officers carry “complaint info cards” to provide during interactions with public.</p> <p>Allow third party complaints; anonymous complaints; unsigned complaints</p> <p>Increase time-period in which to file complaints.</p> <p>Comprehensive public education and outreach on complaint process; also educate officers about the process.</p> <p>Paradigm shift so that input from complaints maximized as management and learning tool.</p> <p>Need fully developed selection criteria for board members.</p> <p>Board members should not be selected by the executive branch only.</p> <p>City Council should confirm appointments to the Board.</p> <p>Citizen oversight boards have mixed reviews in terms of efficacy. We need a working model, not lip-service to the concept of citizen oversight.</p> <p>Explore efficacy of “elected boards”</p> <p>Need to include stipulation that a study be made of best practices</p>
---	---

	<p>BEFORE implementing reforms in this area.</p> <p>Independent IG or Police Auditor monitors complaints for patterns, trends, etc.</p> <p>Legislative/Charter changes may need to be made to make the Citizen Review Board more efficacious...</p>
<p>13. Professional Development Support Mechanisms (EIS System, etc.)</p>	<p>Deployment of a comprehensive “Early Intervention System” in which a comprehensive set of factors are incorporated to help identify performance strengths and challenges for individual officers and trends in the division.</p> <p>Ensure mandatory EIS participation.</p> <p>EIS tool made publically available, as well as all criteria for promotion, advancement and discipline.</p> <p>EIS utilized not only to identify negative outliers for remediation/discipline, but also for positive trends and commendations.</p> <p>Officers evaluated, incentivized, and disciplined with regard to bias-free and community policing.</p> <p>EIS Data Periodically Reviewed by Training Advisory Committee</p> <p>Trends factor into and help drive strategic training objectives</p> <p>Procedures put in place to ensure proper operability of EIS, with ongoing oversight of efficacy by police auditor or IG as well as internal oversight.</p> <p>EIS Inputs/Variables will follow a set of comprehensive best practices, to include:</p> <ul style="list-style-type: none"> a) all uses of force, including critical firearm discharges, both on-duty, secondary employment, and off-duty; b) the number of ECW units in use (from check out log); c) each canine officer’s canine bite ratio; d) all injuries to persons in-custody, including in-custody deaths; e) all instances in which force is used and a subject is charged with obstructing or resisting an officer, interfering with a law

	<p>enforcement investigation, assault on an officer, assault-with-a-deadly-weapon on an officer, or similar charges;</p> <p>f) all misconduct complaints (and their dispositions);</p> <p>g) data compiled under the stop data collection mechanism;</p> <p>h) all criminal proceedings initiated against an officer, as well as all civil or administrative claims filed with, and all civil lawsuits served upon, the City and/or its officers or agents, resulting from CDP operations or the actions of CDP personnel;</p> <p>i) all judicial proceedings where an officer is the subject of a protective or restraining order;</p> <p>j) all vehicle pursuits and traffic collisions involving CDP equipment;</p> <p>k) all loss or theft of CDP property or equipment in the custody of the employee, including currency, firearms, force instruments, and identification cards;</p> <p>l) all interviews or interrogations in violation of CDP policy;</p> <p>m) all instances in which CDP learns or is informed by a prosecuting or judicial authority that a declination to prosecute any crime was based upon concerns about the credibility of a CDP employee or that a motion to suppress evidence was granted on the grounds of a constitutional violation by a CDP employee;</p> <p>n) all disciplinary action taken against employees;</p> <p>o) all non-disciplinary corrective action required of employees;</p> <p>p) all awards and commendations received by employees;</p> <p>q) complete training history, including firearm qualification and other weapon certifications, CIT, LEED, FAIP, CPR, etc. for each employee; and</p> <p>r) sick leave usage</p> <p>s) other supervisory observations or concerns.</p> <p>Secure CALEA accreditation (Commission on Accreditation for Law Enforcement)</p>
--	---

<p>14. Institutionalize Ongoing Independent Oversight: Inspector General/Police Auditor</p>	<p>Establish a properly staffed, independent Inspector General/Police Auditor position with subpoena power to review Cleveland Division of Police organizational practices on an ongoing basis.</p> <p>Ex: City-wide IG model - Detroit, New Orleans or Police Division IG/Auditor - NY, LA, San Jose</p> <p>EIS monitored by Inspector General/Police Auditor for trends</p> <p>I. DRAFT PROPOSAL FOR OFFICE OF THE INSPECTOR GENERAL FOR CLEVELAND POLICE DEPARTMENT (“OIGPD”).</p> <p>A. Appointment. The Mayor of the City of Cleveland (“Mayor”) shall solicit applications from the community and nominate an Inspector General for the Cleveland Police Department (OIGPD). This nomination must be approved by a majority of the members of the Cleveland City Council (“City Council”). The OIGPD and all candidates for OIGPD must be licensed to practice law in the State of Ohio for more than eight years and have experience litigating police misconduct and/or excessive-force cases.</p> <p>B. Term. The OIGPD will serve for a term of six years. The OIGPD can serve more than one term after nomination by the Mayor and confirmation by City Council.</p> <p>C. Removal. The OIGPD can be removed from office before the completion of any full term upon proof of serious misconduct and/or dereliction of duty. Any removal of the OIGPD must be approved by the Mayor and a majority of the members of City Council.</p> <p>D. Duties. The OIGPD shall have authority to investigate all claims of serious misconduct by members of the Cleveland Police Department (“CPD”), including claims of bodily injury and/or excessive force. The OIGPD must investigate all findings from any state or federal judicial officer that a member of the CPD engaged in perjury, excessive force, and/or serious misconduct that could result in a felony. The OIGPD shall also investigate internal complaints of serious misconduct, excessive force, and/or perjury that members of the CPD have lodged against other members of the CPD.</p> <p>E. Investigations. The OIGPD shall establish training for members of the CPD to ensure they are aware of the following procedures for OIGPD investigations:</p>
---	--

	<p>1. Duty to cooperate. CPD employees have a duty to, and shall, cooperate fully with the OIGPD investigations. CPD employees who refuse to cooperate with an OIGPD investigation may be subject to formal discipline, up to and including removal.</p> <p>2. Duty to Report. CPD employees have a duty to report non-frivolous misconduct of fellow CPD employees. CPD employees who refuse to do so may be subject to formal discipline, up to and including removal.</p> <p>3. Interference. CPD employees cannot interfere with OIGPD investigation and/or subpoenas. CPD employees who refuse to do so may be subject to formal discipline, up to and including removal.</p> <p>4. Confidentiality. All OIGPD proceedings will remain confidential during the pendency of the OIGPD investigation. However, if the OIGPD determines that the accused member of the CPD engaged in perjury, excessive force, and/or serious misconduct that could result in a felony, the OIGPD’s findings must be made public.</p> <p>F. Reports – The OIGPD shall complete an annual report that details the number of CPD complaints that allege perjury, excessive force, and/or serious misconduct that could result in a felony. The report shall also detail how the complaint was resolved, how long it took to resolve the complaint, and whether the CPD member was disciplined, recommended for prosecution, and/or prosecuted. The report shall also detail whether the complainant alleged discrimination on the basis of race, religion, ethnicity, sexual orientation, and/or membership in any other recognized protected class.</p> <p>G. Disciplinary Recommendation and/or Referral to Prosecuting Authorities.</p> <p>1. At the conclusion of an OIGPD investigation, the OIGPD can recommend that the CPD employee be disciplined, discharged, and/or referred to the appropriate authorities for prosecution.</p> <p>2. The OIGPD at his/her discretion may present to the Cleveland Municipal Court, at a hearing on probable cause, all of the evidence necessary to support a finding by a Municipal Court Judge that the case should be referred for prosecution by the Cuyahoga County Prosecutor’s Office.</p> <p>3. The Mayor, City Council, and/or the Cleveland Safety Director</p>
--	---

	<p>cannot interfere with and/or overrule the OIGPD’s recommendation that a member of the CPD be referred for prosecution.</p> <p>4. When the OIGPD cannot substantiate the allegations in a complaint, the matter can be dismissed or referred back to the CPD as a management issue.</p> <p>H. Coordination with Citizens Review Board.</p> <p>1. The OIGPD will cooperate with and not interfere with the work of the Citizens Review Board, which investigates allegations of CPD misconduct that do not rise to the level of a felony.</p> <p>I. Funding</p> <p>1. The OIGPD shall submit a budget for the operation of its office to the City Council. The City Council shall not fail to approve an OIGPD budget for any year the office is in existence. The City Council shall use their best efforts to ensure adequate funding for the operation of the OIGPD’s office so that it can carry out its duties and responsibilities.</p>
15. Risk Management Office	Establish “office of constitutional policing and risk management”
16. Training	<p>Comprehensive training of police personnel, including support personnel and dispatchers on community policing, utilization of technology, bias-free policing and crisis response training</p> <p>All training materials, trainers and frequency of training made publically available at all police stations, council offices, rec centers, public libraries, and on line.</p> <p>Strategic Training Advisory Group that includes systematic community input</p> <p>Training driven by community input as well as data from EIS, etc.</p> <p>Officers should be required to qualify to use their firearms annually and failing to qualify should result in them turning over their firearm and additional training</p> <p>Mandatory on-going division-wide training on perishable skills (CPR, weapons handling, etc.)</p> <p>Mandatory L.E.E.D. (Listen and Explain with Equity and Dignity) leadership training; FAIP (Fair and Impartial Policing) training etc.</p>

	<p>Mandatory Crisis Intervention Training (CIT); de-escalation training for all officers</p> <p>Bias-Free Policing Training, that includes racial, ethnic group, gender awareness trainings.</p> <p>Mandatory yearly 4th Amendment Training (use of force and stops, searches, seizure, and arrests training to ensure constitutional compliance)</p> <p>Training on youth engagement</p> <p>Increased training on handling domestic violence, sexual assault, and missing persons cases, interviews, and investigations</p> <p>LGBT issues/interaction training, with a special focus on the needs of the Transgender community.</p> <p>-----</p> <p>Training that goes beyond cultural competency to help shift common understandings, stereotypes through an understanding of history, contemporary contexts in a "social justice framework", for example, training in:</p> <ul style="list-style-type: none"> • historical development of police forces • history and contemporary status of police-community relations in Cleveland and elsewhere • racial relations, institutional discrimination specific to the Cleveland context and elsewhere • differentiation of constitutional policing, bias-free policing, problem-oriented community policing and role of community in each <p>Such trainings could be linked to "rewards" or incentives:</p> <ul style="list-style-type: none"> • credits to advanced/continuing education credit program • training program helps officers earn an advanced degree, certification, professional standing ... and therefore pay increases as well <p>Such trainings would enhance understanding and provide an avenue to common understanding and trust building (at least one or more of these sessions could incorporate community members, use their stories as case studies, etc., The curriculum can be developed ...)</p> <p>This could be both in the academy for on-boarding training, but also "continuing education"</p>
--	---

<p>17. Recruitment/Hiring</p>	<p>Comprehensive strategic recruitment process that has diversification as one of its main goals so the force will look like the community it serves.</p> <p>Report annually recruitment plan, criteria, activities, and outcomes.</p> <p>Create a sustainable, barrier-free “diversity pipeline.”</p> <p>Additional educational requirements (Associate’s Degree as minimum educational criteria, instead of high school degree) Research shows the more education an officer has the less like force will be used.</p> <p>Or adopt request that a potential recruit is at least working toward AA degree.</p> <p>So as not to shut out diverse communities with additional (but necessary) education requirements that may create barriers, consider dual track (like a ROTC process targeted toward diverse communities) whereby (private/federal/state) funding is provided to train and prepare candidates from diverse communities to qualify as police recruits.</p> <p>Ex: Like CLEO (Council on Legal Education Opportunity) www.cleoscholar.com, but for police career entrance preparedness.</p> <p>Change old “1 in 3” rule to “2 in 3” rule, i.e., two minorities per every one majority. [need to check into this]</p> <p>Need independent scrutiny of how candidates picked AFTER they pass the civil service exam. Top brass needs to see all the files, not just the ones recommended, with an eye on issues related to possible discrimination in hiring. Eliminate unseen preferences that are masked by reasons that “appear to be neutral. Need reforms to the internal hiring process.</p> <p>Ex: recent academy cohorts had no or very few members of diverse communities.</p> <p>Review of hires involves thorough background, reference, employment history check, including watching for red flags, etc.</p> <p>Deploy special measures to address “retraining & de-</p>
-------------------------------	---

	programming” of returning military who are entering the Cleveland Division of Police.
18. Personnel - Mental Fitness Evaluation Criteria	Revision of periodic psychological and evaluation criteria for all law enforcement personnel
19. Collective Bargaining Agreement	<p>Revision of Collective Bargaining Agreement (CBA) to address concerns related to use of force.</p> <p>Review by civil rights attorneys of Collective Bargaining Agreements and General Police Orders.</p> <p>CBA's must align w/ training requirements & goals.</p> <p>CBA's should align in principle with policing community-oriented, bias-free policing best practices.</p> <p>Contracts should be reviewed with an eye on issues where contract clauses may interfere with the delivery of Constitutional policing and community-oriented, problem-solving policing.</p>
20. Labor Relations and Arbitration Issues	<p>Review impact of discipline related to excessive use of force and police accountability.</p> <p>Establish citizen’s advisory group that includes civil rights attorneys and others included to provide input related to labor relations and arbitration issues</p>
21. Communication/Dispatch Technology	<p>Prioritize funding so officers have working and effective Computer Aided Dispatch/Mobile Data Units in all vehicles and enough computers in districts to ensure officer and community safety, constitutionally effective policing and meet reporting requirements</p> <p>Seek specialized grants for equipment upgrades</p>
22. Body Cameras/Camera Glasses	<p>PRIOR to deployment, establish comprehensive policy for data collection, user controls, maintenance, retention time-lines, storage costs, public records access, privacy protections, etc.</p> <p>PRIOR to deployment, require input and review by independent civil liberties, privacy, and technology experts and the public during the policy formulation process, including reputable national groups that specialize in privacy and technology issues such as the Bill of Rights Defense Committee; the Electronic Frontier Foundation (EFF); the Electronic Privacy Information Center (EPIC); the ACLU; the Center for Democracy and Technology, etc.</p>

	<p>PRIOR to deployment, a fully vetted Privacy Impact Assessment (PIA) should be conducted and published by a competent, independent third party research entity.</p> <p>PRIOR to deployment, need public education campaign, plus public feedback/comment period.</p> <p>PRIOR to deployment, Need proper officer training and education on the equipment to get buy in and stewardship.</p> <p>PRIOR to deployment, program officers should conduct a series of community input meetings specifically with witness/victims experts and groups that deal with rape/sexual assault, domestic violence, trafficking and immigrant issues.</p> <p>Establish program and mechanisms to measure efficacy and performance of cameras over time. (IG audits, community & expert review, etc.)</p> <p>To protect citizens’ and victims’ rights, all officers deploying cameras should provide each person encountered with a warning notice that they are being recorded. Cards should be given to all persons encountered with information about their rights with respect to the cameras, including the right to have the camera turned on or off, where applicable. Cards should also include contact information regarding requesting copies of the video and the procedures for access.</p> <p>A disparate impact study should be initiated within one year of full deployment of the cameras. Disparate impact study should include reporting with respect to impact on communities of color; on victims and witnesses; and on immigrant communities.</p>
<p>23. Interactions with Limited English Proficient Individuals/Newcomers</p>	<p>Adopt policies to ensure effective communication with all community members regardless of their national origin, ability to speak, read, write, or communicate/understand English.</p> <p>Make all police policies available in languages needed based on city demographics.</p> <p>Need to review policies and submit recommendations where needed; need to review use of language line; intersection with other areas of criminal justice system.</p>
<p>24. Gender Based Issues</p>	<p>Citizen advisory group on issues such as domestic violence and sexual assault;</p>

	<p>Sexual coercion by officers prohibited; the practice of extracting sexual acts and sexual favors in exchange for leniency should be prohibited.</p> <p>Investigatory and enforcement focus should be on “johns” rather than on prostitutes.</p>
<p>25. Social Service/Mental Health Provider Issues (includes chemical dependency co-diagnosis, etc.)</p>	<p>Establish ongoing relationships with social service/mental health provider agencies to get advisory input on a range of issues related to social services and mental health/chemical dependency issues and police interactions with impacted populations</p> <p>Institute social service provider “ride-alongs” on calls where crisis intervention is needed.</p> <p>Heavy emphasis on CIT training both at the academy and during in-service (see training section)</p>
<p>26. Cultural Transformation</p>	<p>“Inside the box” policing criteria is not a sufficient performance standard for effective policing.</p> <p>Transformation of the organizational culture of “us v. them”, “forward-operating-base” type policing mentality to an efficient, professionalized, bias-free customer-service model that incorporates a constitutionally-based, problem-solving oriented, best-practices driven, community-policing model of service delivery.</p> <p>Community helps redefine/rewrite stated vision, mission, and strategic plan of the Cleveland Division of Police</p> <p>Rework logos, branding, division vehicle colors, etc. (to be upgraded upon attrition over time) (Ex: CLE Cleveland Hopkins fleet program)</p> <p>Engage research experts to study organizational culture and make recommendations.</p>
<p>27. Disparate Impact Policing</p>	<p>Establish CSFJC working group that gathers research on policies and procedures that have a disparate impact on diverse community (particularly African American communities) and explore new ways to challenge police practices that have a disparate impact. (Check in on Seattle’s initiative, research on this issue; they have a consultant who is working on this.)</p>

Incomplete WORKING DRAFT Section below to be expanded and moved to a separate document.

Possible Legislative Reforms		
Invite Public Comment	Provide public comment section at City Council Meetings (Plenary and Committee meetings)	
Mobile City Council	Hold regular listening tours in the community on various topics (mobile city council)	
Increased Oversight Functions	<p>Increase size of City Council Safety Committee for more effective oversight</p> <p>Increase education and specialization of Safety Committee – need ongoing education, training, budget for attending conferences on best practices in policing, etc.</p>	
Step Up Legislative Track	Research useful legislation to help speed up police reforms	
Anti-Profiling Legislation	<p>Implementation of comprehensive and enforceable anti-profiling legislation (APL) with corresponding revision to the General Police Orders (GPOs)</p> <p>APL legislation will ban profiling on the basis of race, ethnicity, religion, national origin, sexual orientation, gender identity, citizenship status, etc.</p> <p>Policies for comprehensive data collection, analysis and reporting</p> <p>Legislation should be implemented at city, county and state level.</p>	
	Engage City of Cleveland Community Relations Staff in the Community Engagement piece around police reforms	
Independent Special Prosecutor Independent Special Investigatory Process (statewide legislative issue)	<p>Establish an Independent Prosecutor/Investigation process which would be enacted to investigate/prosecute cases related to allegations of police misconduct.</p> <p>Long term appointment that outlasts a particular administration.</p> <p>Possibly similar to State of Wisconsin independent investigation of deaths in police custody law (2013 Assembly Bill 409) see: http://docs.legis.wisconsin.gov/2013/proposals/ab409</p>	

	Internal note, see: http://truth-out.org/news/item/23463-wisconsin-passes-first-state-law-requiring-independent-investigations-of-police-custody-deaths	
--	---	--