



REPORT OF THE WFU POLICE ACCOUNTABILITY TASK FORCE

WFU POLICE ACCOUNTABILITY TASK FORCE REPORT JUNE 2015

TASK FORCE MEMBERS

Wake Forest University
Police Accountability Task Force
June 2015



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EXECUTIVE SUMMARY

OVERVIEW

In 2014, after allegations of racially-biased policing by the Wake Forest University Campus Police Department (WFUPD), Wake Forest University (WFU) employed a third-party consulting firm, Developmental Associates, to investigate these allegations. After interviewing various constituents and reviewing WFUPD data, the consulting firm generated a report, a summary of which was made publicly available to the campus community ("The Consultants Report," Exhibit 1). The Consultants' Report concluded that while there was no targeted bias on the part of the WFU, there was a perception of bias that



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damaged the community's trust in the WFUPD. Thus, the Consultants' Report included several recommendations to improve relations between the WFUPD and the constituents. These recommendations ("the Consultants' Recommendations" or "the Recommendations") related to specific training for WFUPD personnel, increasing diversity within WFUPD, improving supervision and communication between nightshift personnel and commanding officers, updating the Large Social Event Management Guidelines and reinstituting the Major Event Committee, and increasing opportunities for improved community engagement to build trust and legitimacy between the community and the department.

In December 2014, the Vice President of Campus Life created the WFU Police Accountability Task Force to oversee the implementation of the Consultants' Recommendations. Additionally, Campus Life charged the Task Force to conduct a review of the WFUPD's internal policy regarding body-mounted cameras. At the initial PATF meeting, task force members were divided into the working groups based on the Recommendations. From January through March 2015, the PATF held meetings with members of the WFUPD and members of other WFU departments to discuss the progress with respect to implementing the Consultants' Recommendations. The working groups held initial meetings, consulted with police experts, conducted numerous interviews with WFUPD personnel, requested and reviewed relevant documents, and analyzed data to assess the progress that WFUPD and WFU were making toward implementing the Consultants' Recommendations. During this information-gathering phase, the working groups reviewed information related to best practices with respect to training, hiring, supervision of nightshift officers, the use of body-mounted cameras and community engagement. The PATF also held several meetings to engage in deliberative dialogue about future steps the WFUPD and WFU could take to implement the Consultants' Recommendations and ensure that the Recommendations led to improvements.

According to the PATF, the WFUPD and other relevant departments have made great strides toward implementing the Consultants' Recommendations. There are, of course, several areas that will need continued attention before the PATF determine whether the department is deemed to be in substantial compliance with the Recommendations. These areas of progress and areas for improvement are discussed in great detail below but a brief summary is as follows. First, an overwhelming majority of the sworn and non-sworn personnel have completed Unconscious Bias Training that was specifically delineated in the Consultants' Report. The University and the WFUPD acted swiftly to hire an outside contractor to provide Unconscious Bias training and to schedule multiple sessions, which allowed nearly 92% of sworn officers and 97% of the security officers to receive Unconscious Bias Training. Notwithstanding the progress in this area, the PATF recommends that WFUPD provide consistent, scenario-based training opportunities for officers to increase their job effectiveness. The PATF also suggests that officers engage in Justice Training (described in detail



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below), a specific training that led to community-building and increased legitimacy in other police departments and communities where it has been used. The PATF believes that this training could be particularly helpful in the college campus environment.

The PATF surveyed the current diversity of the WFUPD. Currently, the WFUPD is comprised of 66 employees (sworn and unsworn). There are 40 non-sworn and 26 sworn officers. Of the 26 sworn officers, 1 is black and 1 is Hispanic/Latino. (See Exhibit 1) WFUPD has made several changes in the hiring process, discussed below, that it hopes will result in a more diverse pool of applicants for positions in the department. The PATF recognizes that increasing racial diversity within the department is important to increasing trust and legitimacy within the campus community. Increasing diversity is a long-term goal and meaningful progress will take more than a few months. WFUPD needs to explore creative models to attract and recruit diverse applicants. Furthermore, the community should be allowed to take a greater role in the interview and selection process of candidates. Community participation not only allows the community a voice in choosing those who will serve their campus community, but impresses upon the candidates the emphasis that WFU places on its community and the differences between campus policing and municipal policing.

The PATF reviewed the concerns set forth in the Consultants' Report regarding night shift supervisors. As a result of the review, the PATF notes that increased opportunities for interaction between the nightshift and the command staff could improve communication and opportunities for supervision and evaluation. In the coming weeks, the PATF will have the opportunity to work strategically with the WFUPD to offer suggestions and technical assistance to develop potential strategies and models to achieve such interaction.

The PATF also recommends that the WFUPD adopt the revised policy on personal body cameras, General Order 111 (attached as Exhibit 2). The revised body camera policy is the result of extensive research regarding the best practices and current literature available with respect to body cameras. The PATF believes that this document provides guidance to officers using body-worn cameras and addresses the privacy concerns this new technology raises. However, the PATF recognizes that body-worn cameras are an evolving technology and present new policy concerns not only for campus police departments, but for municipalities as well. Thus, the PATF recommends that the WFUPD stay abreast of best practices and state and federal legislation regarding use of the cameras, including video and audio captured by such use.

The PATF believes that the WFU Police Advisory Board (PAB), an entity created in 2009, can play a valuable role in sustaining the progress made by implementing the recommendations in Developmental Associates Report, and ensuring ongoing compliance with these recommendations. Dr. Angela Mazaris, the



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Chair of the PAB, is serving as that entity's liaison to the PATF and has worked closely with the PATF to identify areas in which the PAB can support the continued efforts to improve transparency and accountability. Given that the PAB is composed of a wide cross-section of WFU community members, Dr. Mazaris notes that the PAB is poised to assist the WFUPD in holding focus groups, listening sessions, and other means of campus engagement and formalizing and taking on long-term responsibility for on-going community feedback mechanisms. Also, the PAB could potentially bring research on nationwide best practices (for example, the use of body cameras) to the University Police Department, and create public forums for disseminating and discussing these practices. Finally, the PAB could assist the PATF, with approval from the Chief with developing systems of accountability with regard to follow up on PATF recommendations.

The University has made progress with respect to event management practices at large event venues, but additional attention is required to reduce alcohol use at student events held on- and off-campus. As noted in the Consultants' Report, disparate levels of supervision regarding campus lounges, which are utilized by mostly white fraternities and sororities, and large event venues, which are typically used by traditional minority fraternities and sororities have generated much discussion. The large event venues were heavily policed, while activities in campus lounges, many of which involved alcohol consumption, were not policed. In the 2014 fall semester, Dean of Students staff assumed greater responsibility for management of student sponsored events on campus and developed new event management resources and planning protocols to better support student leaders with the events they plan and manage. While this was occurring, a committee of students, faculty, and staff developed new event management protocols for the community. The committee believed that pursuing recommendations in the Consultants' Report would increase law enforcement staff and use of undesired crowd control techniques at student-sponsored events. It was determined that this approach would not ease tension or reduce concerns in the community. The group chose to pursue new event management strategies that targeted issues unique to each campus event and venue. Changes include improved event management resources and training for student event sponsors and advisors; improved pre-event coordination and post-event debriefing with student event sponsors; increased partnership and role for students in the management of the events they sponsor; hiring students to support management of events; reduced law enforcement staffing at large event venues; use of web-based reservation and ticketing services to streamline event planning, accelerate entrance at large event venues, improve financial accounting necessary for payment of the NC Entertainment tax; and increased presence of staff (i.e., graduate and professional staff, night security, law enforcement) in the Quad and other areas of campus where students are active in the evening.

With respect to increased community and WFUPD engagement, several members of the WFUPD and the PATF have attended the Trust Talks held in March 2015. The dialogue initiated at the Trust Talks indicated a need for greater student involvement in such discussions. Additionally, participants identified a need for greater social interactions between students and officers so that they could have the opportunity to view each

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other outside of the context of formal police investigations, increase opportunities for night security to experience the university during the day to establish a balanced view of the community; sponsor WFUPD Citizen Police Academy or abbreviated training series for members of the community to develop relationships with officers and learn about the professionalism behind law enforcement and challenges associated with community policing.

Summary of Recommendations

1. Training

The PATF recommends that WFUPD:

- Require that every employee of WFUPD who engages with students (including all sworn and unsworn officers) complete the intercultural competency training or a satisfactory equivalent, by the end of 2015. All sworn officers and others who have responsibility for completing bias-related incident reports should be mandated to complete such training by the end of the 2015 calendar year. It is the understanding of the PATF that WFUPD has mechanisms in place to track the training and certification requirements of its employees. Thus, the Task Force recommends that WFUPD identify employees who have not completed the requisite training by September 30, 2015 and provide an explanation for the failure to receive such training.
- Offer more frequent opportunities for officers to engage in the diversity and bias-related training and make it part of the department's in-service training to facilitate compliance.
- Identify, in addition to intercultural competency, de-escalation and bias-related training, WFUPD should identify a third party that provides Procedural Justice Training to enhance trust and improve interactions between campus police and campus constituencies. (see also Community Engagement Recommendations) Procedural Justice in policing is characterized by the following four tenets: Respect, Legitimacy, Transparency and Fairness.¹
- Define the role of a dedicated Training Coordinator who oversees training, certification, and compliance with training requirements.

¹ A link to a sample Procedural Training Curriculum may be found at: <http://www.cops.usdoj.gov/pdf/conference/2011/ProceduralJustice-Kunard.pdf>. Additional resources are available at <http://cops.igpa.uillinois.edu/procedural-justice-resources>.

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- Seek additional funding from the University or grants to fund training. The PATF understands that the additional training and other recommendations of the PATF may impact the 2015-2016 budget (and budgets beyond the next fiscal year), and the PATF recommends that WFUPD determine the amount of additional funding needed to comply with the recommendations and seek necessary funding from WFU and/or identify other potential sources of funding (i.e., grants).
 - Engage in self-evaluation and conduct assessments to determine the effectiveness of training (e.g., have complaints increased or decreased after training).

2. Diversifying WFUPD Police Force:

The PATF recommends that WFUPD:

- Select diverse individuals across the WFU community who interact closely with University Police to serve on interview committees of applicants for positions in the police department and to assist with the process for selecting new hires.
- Utilize strategic recruitment techniques offered by Human Resources to identify targeted areas such as criminal justice majors at WSSU. Advertise WFUPD positions on diverse sites, in diverse publications and in diverse locations and encourage applications from law enforcement officers that have prior campus police experience.
- Periodically review data in applicant tracking system to see if diverse candidates are applying and/or being interviewed.
- Explore meeting with local high schools to discuss law enforcement in higher education as a great career choice. Consider other programs to help educate the community and our faculty and staff responsibilities of our WFUPD.
- Utilize IACLEA as a resource to obtain best practices for hiring a diverse workforce.

3. Supervision of Nightshift Officers:

The PATF recommends that WFUPD:

- Increase communication and interaction among the supervisors and nightshift officers. Possible organizational changes might include:

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- Establishing rotating shifts for supervisors in the Department.
 - In the absence of rotating shifts, develop a process that would require senior WFUPD staff to make both routine and unannounced visits during night shifts.
- Implementing a “watch commander” concept in the Department.

4. *Body Cameras*

The PATF recommends that WFUPD:

- Adopt the revised version of the Body Camera Policy which provides guidance to officers related to instances in which cameras must be deployed and delineates procedures for storage and usage of footage. (Exhibit 2).
- Consider implementing procedures, if feasible, that would delegate the responsibility for downloading video footage to a designated member of the WFUPD at the end of an officer’s shift.
- Develop guidelines and procedures for allowing individuals who file complaints against the police to view the footage.
- Regularly review best practices and applicable law with respect to body cameras and amend the policy as needed, recognizing that body cameras represent a new technology and that new issues and best practices may continue to develop and evolve.
- Address infractions of the Body Camera policy in a manner consistent with infractions of other departmental policies.

5. *Event Management*

The PATF recommends to following:

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- The WFUPD should continue efforts to partner with student event hosts and their advisors before and during events.
 - The WFPD should initiate programs, resources, and interactions that increase student understanding about the types of behaviors that raise concern and/or will likely attract attention from law enforcement at student-sponsored events. The initiatives should include recommendations about the ways students should respond if approached. Special attention should be given to those organizations hosting events with alcohol in lounge spaces on campus.
 - The WFUPD should continue to increase presence of security and law enforcement staff in the Quad and other areas of campus where students are active in the evening.
 - The WFUPD should support expansion of the Dean of Students' Event Resource Manager (ERM) program. This may include design and facilitation of training for ERM staff and support for the development of protocols that insure shared understanding and coordination between ERM and law enforcement specific to risk identification, early-intervention, and response.

6. *Community Engagement*

- WFUPD should develop opportunities for increased social interaction between police and students to increase the level of trust and understanding on both sides (e.g., athletic competitions)
- Mandatory attendance by police at several academic events each year to ensure that police officers have an opportunity to engage with students in non-investigatory situations. This should include evening security and officers in the night-shift.
- The WFUPD should capitalize on its relationship with the PAB to develop ideas about what social interactions might be most effective and efficient to build trust and legitimacy between campus constituencies and the department.
- The WFUPD might consider sponsoring a Citizen Police Academy or abbreviated training series for members of the community to promote positive relationships between community members and

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officers and demonstrate the professionalism behind law enforcement work and challenges associated with community policing.

CURRENT STATUS/FUTURE ACTION ITEMS OF CONSULTANTS' RECOMMENDATIONS

1. TRAINING

Consultants' Recommendation:

WFUPD should provide culturally diverse and bias-based training programs for each employee at Wake Forest University Police Department (WFUPD). This training should include unconscious and conscious biases. Wake Forest University has one such program on campus taught by a faculty member who is the Manager in the Office of Diversity. This program should be mandatory and ongoing. The investigation also uncovered similar diversity training on the campus of Winston-Salem State University. This investigation has focused mostly on the WFUPD; however, many persons interviewed felt that other University departments should be required to take this training as well.

Current Status:

In January 2015, the Task Force Chair met with Chief Lawson and described the structure and function of the Task Force. At this meeting, the Chair and Chief Lawson discussed the current training requirements in the police department. WFUPD officers have internal training that they must complete, but are also subject to state mandated training. Based on the Task Force's review of the materials provided, there is no state-mandated external training for WFUPD related to cultural diversity and unconscious bias. Thus, prior to the Consultants' Report, WFUPD officers received minimal training on unconscious bias.

The Task Force also consulted with Shayla Edmunds, Manager of Diversity Education at WFU, to review plans she created and submitted to Chief Regina Lawson for intercultural police training during the 2014-2015 fiscal year. Ms. Edmunds provided two documents, including:

- Office of Diversity and Inclusion Proposal for Intercultural Policing Training for WFUPD submitted in April 2014.

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- Office of Diversity and Inclusion Proposal for Intercultural Policing Training for WFUPD revised and resubmitted in August 2014.
 - In February 2015, the Task Force asked Shayla Edmunds to provide (1) an overview of bias-related training jointly coordinated by Diversity Education and WFUPD and offered, to date, in 2014-2015, and (2) her recommendations for future training. She provided a document entitled Overview and Recommendations for WFUPD Policing Training.

In addition to the above, the Task Force also requested, and was provided with the following documents, from the WFUPD (these documents are on file with the PATF):

- List of all training in which officers participated in 2013-2014
- Training programs planned for the remainder of the 2014-2015 fiscal year
- List of the training that is mandated by the State of NC, IACLEA or other agency and WFUPD in-service training for 2014-2015 (mandated or optional)
- Description of how the WFUPD keeps track of training and certification of individual officers
- Description of the training coordinator's duties
- Class Rosters for BIRT Training

Based on these documents, WFUPD offered the following training to its officers:

1. North Carolina Diversity and Inclusion Partners Conference (NCDIP) on **Unconscious Bias in the Workplace** with Keynote address by Howard Ross, *Cook Ross Consulting* (Date: 11.21.2014)
2. **Cultural Self-Awareness & Unconscious Bias** (Date: 12.2.2014)
 - Facilitated by Howard Ross, *Cook Ross Consulting*
 - Two, 3.5 hour, consecutive sessions to enable participation of all officers
 - *Objectives:*
 - Understand what bias is and how it impacts decision making
 - Develop a better understanding of power and privilege and how they play out around us
 - Build skills in identifying and navigating from bias
3. **Bias Incident Response Training** (Date: 1.16.2015)
 - Facilitated by *Margolis Healy & Associates*
 - Two, 3.5 hour, consecutive sessions to enable participation of all officers

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○ *Objectives:*

- Emphasize the significance of understanding bias and hate
- Explore the role of BIRT
- Understand the history and professional contexts of bias
- Provide a federal & regulatory compliance refresher
- Practice empathy and protocol

4. Detecting Danger & De-escalating Situations Training II (Date: 1.27.2015)

- Facilitated by Howard Ross, *Cook Ross Consulting*
- Two, 3.5 hour, consecutive sessions to enable participation of all officers
- *Objectives:*
 - Explore impact of perceptions and bias towards law enforcement nationally and on campus
 - Explore impact of law enforcement's perceptions and bias towards WF community
 - Identify opportunities for building trust within the community
 - Identify strategies for detecting danger and de-escalating situations

Based on the class rosters and information provided by the WFUPD, an overwhelming majority of sworn officers and non-sworn officers have completed the Unconscious Bias Training recommended in the Consultants' Report (See table below).

In each category, the percentages are based on the number of officers who participated in the training divided by the number of officers on staff. Numbers and participation rates of officers attending trainings are reflected in the attached charts (see Exhibit 3).

Name of Training	Date	Police (Sworn Officer)	Security	Other*
NCDIP Unconscious Bias in	11.21.14	7 (27%)	0 (0%)	1 (25%)



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the Workplace~				
Cultural Self-Awareness & Unconscious Bias I	12.2.14	27 (92%)	29 (97%)	3 (75%)
Bias Incident Response Training	1.16.15	22 (85%)	0 (0%) +	
Unconscious Bias Training II	1.27.15	25 (92%)	24 (80%)	4 (80%)

~ Participation rate was low because of \$100 registration fee.

*Other includes Non-sworn employees in Communications or Administration

+Non-sworn officers would not be involved in the investigative process of Bias Incident Reporting

- The current record system does not provide information on officers who completed GateKeepers training prior to July 1, 2014. Thus, participation rates for sworn and non-Sworn officers are not included.
- No information is provided to document whether training is mandatory for WFUPD employees.
- No information is provided to describe how officers are allowed or encouraged to make up trainings they have missed.

Name of Training	Date	Police (Sworn Officer)	Security	Other*
GateKeepers 1 Enhancing Our Community Through Inclusion	9.18.14	17	6	9
GateKeepers 1 Enhancing Our Community Through Inclusion	2.11.15	1	2	3
GateKeepers 2 Cross-Cultural Conflict	9.18.14	11	5	8
GateKeepers 2 Cross-Cultural Conflict	10.8.14	2	0	0
GateKeepers 3 Difficult Dialogues	9.18.14	7	4	3
GateKeepers 3 Difficult Dialogues	11.12.14	4	0	1
GateKeepers 3 Difficult Dialogues	4.4.15	2	2	8

*Other includes non-sworn employees in Communications or Administration

WFUPD does not currently have a policy that would mandate its employees take part in the training; thus, the training has been completed on a voluntary basis. Similarly, the PATF is not aware of whether officers are allowed or encouraged to make up trainings they have missed, or whether that would be possible.

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PATF Recommendations:

WFUPD should identify those personnel who have not yet completed the training and make arrangements, if possible, to have the training completed by those personnel. It will be important to ensure that every officer who has contact with campus constituencies receives this training. It is also important to note, that this training should be offered on an ongoing basis with sufficient regularity to ensure effectiveness.² Specific recommendations are as follows:

1. **The WFUPD should offer culturally diverse and bias-based training on an internal basis** Internal training would facilitate greater participation of relevant WFUPD personnel and would ensure consistency in the content and quality of the training provided. To the extent possible, existing WFUPD officers should attend “train the trainer” programs which would allow them to conduct in-service trainings for their colleagues on a more frequent basis, as well as trainings provided by independent contractors that specialize in training law-enforcement officers. . The WFUPD should continue to participate in existing internal trainings (i.e. GateKeepers and Safe Zone Training).
2. **The WFUPD should expand opportunities for Cultural Sensitivity Training.** Of the 107 training sessions listed from July 1, 2013 through July 1, 2014, five were on topics directly related to fostering cross cultural communication/competencies:
 - ✓ Community Oriented Policing (12 attendees: 4 sworn, 6 security, 2 others)
 - ✓ Effective Communication (2 attendees)
 - ✓ Decision Making & Problem Solving (2 attendees)
 - ✓ Diversity Awareness 2013 (1 attendee)
 - ✓ Connections: Exploring, Examining & Erasing Racism Workshop (1 attendee)
3. **The training budget should be increased to include internal training.** This internal training should be on a range of topics to foster the cultural competence of all members of WFUPD who interact with students.

² The Task Force met with Dr. Jennifer Eberhardt, a police practices experts and sociologist from Stanford University when she came to WFU to deliver a lectures. During the meeting, Dr. Eberhardt emphasized the need to have officers engage in training on a continual basis and she emphasized the effectiveness of scenario-based training and role plays. (Meeting with PATF members (Kami Chavis Simmons, Kari Reece, Marchel Ebron, and Dr. Angela Mazaris and Jennifer Eberhardt, held on March 24,2015).

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4. **Provide Intercultural Development Inventory (IDI) workshops for WFUP** Shayla Edmunds, the Manager of Diversity Education at Wake Forest, has been working closely with the WFUPD with respect to diversity training, and she proposes implementing the IDI after officers and staff are given meaningful opportunities to voice their concerns.. Edmunds reports that based on her experience and observations from other university groups who have taken the IDI, it is best that the department be prepared and willing to be as critical of themselves as others may be of them.
5. **Provide ongoing ‘refresher’ training on cultural diversity and bias-based training for all members of the WFUPD.** This might also include developing checklists of best practices for checking one’s own bias and facilitating an internal “norming” process to identify and address barriers to trust and consistency.
6. **Define and clarify the duties of the Training Coordinator.** Currently, the Training Coordinator responsibilities are assigned to an officer who also supervises the Police Communications Center. Thus, WFUPD does not have a dedicated Training Coordinator position.
7. **Conduct ongoing assessments of trainings.** This would provide information on expected training outcomes; include a gap analysis to evaluate future training needs; and provide data to determine if training frequency should be revised.

2. DIVERSITY IN HIRING

Consultants’ Recommendation:

Set a goal with specific timetables and metrics to develop innovative approaches to recruitment and take immediate action to hire additional minorities on the police force. Building a more diverse workforce is a strategy that will benefit the entire University. Hiring veteran officers can be beneficial and an asset to the University. However, care should be taken to make sure the officers’ experience is one of inclusiveness and professionalism. Targeted recruitment of African-American and Latino officers and employees is strongly recommended. The Human Resources Department can be a great asset in identifying appropriate personnel.

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Current Status:

Currently, 25.4 percent of the undergraduate students on the campus of Wake Forest are racial minorities, and 17.5 percent of the faculty and staff are racial minorities. Less than 10 percent of sworn personnel within the police department are members of racial minority groups. Currently, the WFU department is comprised of 26 sworn officers and of these officers, one is African American and one is Latino. The WFUPD follows screening procedures and interviews consistent with other departments, but recognizes the need to employ strategies to increase the pool of diverse applicants. Currently, applications are screened for law enforcement and security experience, and preference is given to those who are currently basic law enforcement certified with experience working with young adults, such as Resource Officers, Community Policing, Crime Prevention or other youth programs.

Sworn Law Enforcement Applicants must complete:

- Emotional Intelligence Testing
- Interview Board
- Written Exercise
- Role Play
- Psychological Exam
- Physical Exam
- Drug Screen
- Comprehensive Background Investigation

Recently, WFUPD has made several changes to its hiring process, and the PATF believes that these changes will be beneficial in ensuring not only a more diverse applicant pool, but ensuring a high quality of applicants in general. All applicants are now asked the following pre-screening question in the application process: “Diversity and inclusion are defining characteristics of Wake Forest University. Briefly describe how you would support these values as a faculty/staff person.”

The following language was added to the police department’s job descriptions: Strong relationship building skills working with individuals from diverse communities and cultures.

Finally, Human Resources recently started using WakeTemps as a way to hire part-time no benefit employees. Many of WFUPD part-time no benefit employees apply for full-time opportunities as positions become available. This new process was implemented to assist with the selection process.

The recruitment responsibility in WFUPD was recently assigned to another person. WFUPD has requested a new Major position. If that position is funded, Recruitment, Selections and Hiring will be one of their key responsibilities. A search committee is being established and will be utilized for all future full-time openings.



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Members of the PATF noted that local universities such as Winston-Salem State University and North Carolina A&T University tend to employ a large number of African-American campus security officers and have done so for a long period of time. This seems to suggest that there is potentially untapped applicant pool upon which the WFUPD could capitalize. Therefore, the PATF believes it would be valuable to have the WFUPD examine the hiring, selection and application processes of these institutions to determine if there are practices and pools of applicant that WFUPD could target to increase racial diversity within its ranks.

PATF Recommendations:

The PATF recommends that WFUPD:

- Select diverse individuals across the WFU community who interact closely with University Police to serve on interview committees of applicants for positions in the police department and to assist with the process for selecting new hires.
- Utilize proactive recruitment offered by Human Resources to identify targeted areas such as criminal justice majors at local and regional colleges and university, including historically black colleges and universities, such as WSSU and North Carolina A&T in an effort to target racially and ethnically diverse officers, as well as officers with prior campus law enforcement experience.
- Advertise WFUPD positions in publications and websites that reach diverse populations.
- Periodically review data in applicant tracking system to determine whether qualified diverse candidates are applying and/or being interviewed.
- Explore opportunities to meet with local high schools to discuss law enforcement in higher education as a career choice, and other programs that could serve as “pipeline” programs for law enforcement.
- Utilize IACLEA, and other institutions as a resource to obtain best practices for hiring a diverse workforce. This is an area of possible collaboration with the PAB.

3. NIGHTSHIFT SUPERVISION

Consultants’ Recommendation:

“It became clear to the investigators that there is disconnect between the wishes of senior police officials and the way those wishes are administered on night shift. Based on comments made by supervisors who work predominately at night, they do not necessarily view themselves as part of management. This can cause problems as these Corporals are managing the department on nights and on weekends. Police Administration

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must work to include Corporals in management decision-making and to foster a greater sense of management responsibility among the night shift supervisors.”

Current Status:

Two Corporals in the University Police Department are assigned to the night shifts. This work arrangement has the potential to create a disconnect between employees who work at night and senior leadership in the Police Department. For example, the Corporals may perceive that they are not considered a part of management with opportunities to provide valuable input on policies and operations in the Department, and senior leadership’s ability to assess whether night shifts supervisors are properly managing employees and whether they are committed to the goals of the Department can be limited.

For many years, the Department has had weekly supervisors meetings, attended by both day shift and night shift supervisors. More recently, the Department has conducted a half-day supervisors retreat and a half-day of supervisors’ discussions. In addition, the Department has reconfigured the reporting structure such that each night shift Corporal now reports directly to a separate day shift Sergeant. The goal with this new structure is to promote better management and accountability. Changes to the University’s event management process has also served to address some of the disconnect felt by the night shift Corporals, who previously may have felt removed from the decision making process regarding event management.

PATF Recommendations:

To help foster strong and effective leadership in the Department, and to ensure all members of the leadership team are fully committed to and working to further the Department’s goals, the following recommendations are provided for review and consideration:

- The WFUPD should develop a detailed plan to implement policies and organizational structures that establish more effective lines of communication between night shift and day shift supervisors. Such a plan would include opportunities to:
 - ensure that night shift supervisors have opportunities for interactions with senior leaders and are encouraged to share ideas and report concerns.
 - ensure that senior leaders have opportunities to evaluate the performance of night shift supervisors.

To accomplish these goals, the WFUPD should examine the efficacy of the following practices:

- Establishing rotating shifts for supervisors in the Department;

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- In the absence of rotating shifts, developing a process that would require senior staff in the Department make both routine and unannounced visits during night shifts;
 - Implementing a “watch commander” concept in the Department. Provided resources for such personnel are available, this position would be assigned to the night shift with responsibilities for overseeing field operations and for ensuring policies and procedures are being followed. This position would not have patrol responsibilities (as Corporals do), but would be strictly supervisory in nature. A strong leadership well-trained in Departmental policies and procedures would be required for this position;

5. BODY CAMERA POLICY

The PATF researched best practices in the use of body cameras, and suggested revisions to the existing body camera policy. The PATF recommends adoption of the revised policy (Exhibit __) which is the result of research related to best practices (bibliography attached).

The PATF Recommends that the WFUPD:

- Adequately notify the campus community and potential visitors that the WFUPD uses body-worn cameras and that, pursuant to the body-camera policy, interactions between the public and the WFUPD may be captured on video. In addition to the verbal notification in the Body Camera Policy, notice may occur by placing signage at all of the campus gates, conducting a educational campaign across campus, placing a notice and the policy on the WFUPD website, or requiring officers to wear lapel pins indicating that cameras are in use.
- Consider implementing procedures, if feasible, that would delegate the responsibility for downloading the video footage to a designated member of the WFUPD at the end of an officer’s shift. Such as procedure would provide an additional “check” to ensure that all footage was collected and was done so in a consistent, routine manner.

REPORT OF THE WFU POLICE ACCOUNTABILITY TASK FORCE

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- Develop guidelines and procedures for allowing individuals who file complaints against the police to view the footage.
 - Develop guidelines for reviewing alleged violations of the body camera policy and ensuring that infractions of the policy are addressed in a manner consistent with other disciplinary violations.

5. EVENT MANAGEMENT

Consultants' Recommendation:

“The use of lounges on campus versus using a large venue has generated much discussion. Activities at the lounges sometimes result in unsupervised parties thus creating an opportunity for heavy and underage drinking. Therefore, we recommend that the administration review this procedure to make sure that all student events are policed in an equal manner. The events held by NPHC organizations are small and they cannot generally meet the required financial responsibility. Additionally, consider reviewing and possibly updating the Large Social Event Management Guidelines. Make sure the students are familiar with the guidelines and have some input since they directly impact them. The students have to agree to be held accountable for not exceeding the capacity limits. Adults and police should play a major role in the decision of assigning students to tasks that may be better managed by an adult. This has been a major cause of confusion during events held by NPHC organizations. If a certain number of students leave an event and if capacity has been met, additional students should not be allowed to enter to fill the gap. When capacity is met, that should be the final count whether someone vacates the premises or not. Only the exact number of tickets should be sold to accommodate the capacity limit. Event sponsors should have a mechanism available to determine the authenticity of tickets that have been sold which should eliminate capacity surplus.

Developmental Associates further recommends that the University and Campus Police re- institute the major event committee. The purpose of this committee is to communicate with all parties involved and should be held at least seven days prior to the event. A detailed written action plan should be completed and discussed during this meeting. This action plan must address personnel assignments, cost and at least a Sergeant in charge. The

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Chief of Police or her designee needs to attend this briefing. This meeting does not counter the meeting officers have 30-minutes prior to the event. Corporals are not part of management. They are aligned more closely with field personnel as opposed to management. Officer in Charge of major events should carry at least the rank of Sergeant.”

TASK FORCE REPORT: EVENT MANAGEMENT PRACTICES

The University has made progress with respect to event management practices at large event venues, but additional attention is required to address alcohol use at student events held on- and off-campus. As noted in the Consultants’ Report, disparate levels of supervision regarding campus lounges, which are utilized by mostly white fraternities and sororities, and large event venues, which are typically used by traditional minority fraternities and sororities have generated much discussion. The large event venues were heavily policed, while activities in campus lounges were not.

Throughout fall 2014, Dean of Students staff assumed greater responsibility for management of student sponsored events on campus and developed new management resources and event planning protocols to better support student leaders for the events they plan and manage. While this was occurring, a committee of students, faculty, and staff developed new event management protocols for the community. The committee believed that pursuing recommendations in the Consultants’ Report would increase law enforcement staff and use of undesired crowd control techniques at student-sponsored events. It was determined that this approach would not ease tension or reduce risk of harm (physical, emotional, financial, and reputational) in the community. It was also determined that the events sponsored by student groups on campus occur in different locations, involve different issues (i.e., alcohol vs. no alcohol; closed event vs. promotion on-campus only vs. promotion on-line and off-campus), and require different strategies as a result. Ultimately, the group determined that new event management strategies targeting issues unique to each campus event/venue were needed to move the community forward.

Within the Dean of Students department, the following belief statements guided the development of the new event-management practices:

1. Increasing support for on-campus student-sponsored events is important for student well-being and community life.
2. There is lower-risk of adverse incidents and increased ability to manage those when student-sponsored events at Wake Forest University occur on campus.

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3. New event management resources, practices, staffing, and technologies are required to reduce (a) the possibility of incidents at Student-sponsored events; and (b) tension, role confusion, and frustration for community members that support student-sponsored events and the guests that attend them.
4. Increasing student involvement and responsibility for management of Student-sponsored events will enable the community to become less reliant on law enforcement for event management practices.
5. Increasing event management training for students and their advisors will better prepare them to reduce harms that occur in the social environment when university personnel are not present.
6. Increasing support for NPHC organizations to successfully host events that are destination locations for collegiate African American students in the Triad Area is vital for the social life of minority students on campus and the financial stability of the organizations.
7. Decreasing alcohol and drug use at student events needs to be a high priority for the university and surrounding community. Making progress in this area will require an environmental approach that is strategic and intentional, or the behaviors will increasingly move off-campus to less structured venues. For this reason, increasing law enforcement and staff presence at IFC and PC lounge parties should occur concurrently with increased communication about incident reduction strategies, event management training, and clear expectation for self- and peer-responsibility.

Event management initiatives and outcomes Fall 2014 – Spring 2015

Improved management resources and training for student event sponsors and advisors

Management tools, resources, and trainings were developed to improve help student leaders minimize the likelihood of physical, emotional, financial, and reputational harm during their events. These resources were integrated into fall semester trainings, student-advising sessions, and have been placed on-line (<http://events.campuslife.wfu.edu/risk-management/>). In addition, new event planning resources were developed to better inform students about (a) important event planning decisions and timelines, (b) contact information for campus resources, and (c) roles and responsibilities of event sponsors and the university staff (<http://events.campuslife.wfu.edu/planning-an-event/>).

Use of web-based reservations and ticketing services to streamline event planning, accelerate entrance at large event venues, improve financial accounting necessary for payment of the NC Entertainment tax

Prior to the fall semester, student-event sponsors often needed to complete hard-copy forms in three separate offices to reserve an event (Facility Reservations, Police Department, and Dining Services). There was limited coordination between administrative offices, which resulted in submission of repetitive information, confusion, and frustration for student event sponsors and staff. To address these issues, Dean of Students'

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staff received support to utilize the university's on-line reservation system for student-sponsored events. This shift enabled the Office of Student Engagement to centralize and improve coordination of student sponsored events. Also, beginning in the fall semester student organizations began using *Eventbrite*, an on-line ticketing system, to improve management of facility capacity, financial record-keeping, and payment of the North Carolina entertainment tax. The Benson ticket office began selling tickets for events registered on *Eventbrite* for attendees that prefer to pay cash. New iPads were purchased for event staff and student event sponsors to use to scan iPhone and printed tickets at events. At the Barn, this change reduced: (a) cost and effort associated with event promotion, (b) past concerns about counterfeit paper tickets, and (c) the amount of time required for an attendee to enter the event, which subsequently reduced the press on the door (safety concern).

Improved pre-event coordination and post-event debriefing with student event sponsors

In the Fall semester, staff began holding Event Planning Meetings with student event sponsors to review their plans and coordinate university services. During these meetings, students receive guidance on marketing and promotion, ticket sales, the North Carolina entertainment tax, contracting, and risk mitigation strategies. Staff also created the *Eventbrite* page for student sponsors to personalize prior to marketing their event through social media. This change reduced redundancy in university processes, helps identify and address loose ends that previously caused frustration for students and staff, and clarified the roles and responsibilities of event sponsors. Information about this process has been placed on-line: <http://events.campuslife.wfu.edu/planning-an-event/>. After the event has occurred, student event sponsors are contacted to attend an event de-briefing to discuss the event strategies that worked well and could be improved when planning future events.

Hiring students to support management of events

During fall 2014, 12 undergraduate and graduate student event staff were interviewed, trained, and hired in a pilot program to: (a) increase student involvement and reduce law enforcement in the management of student-sponsored events, and (b) increase staff presence and interaction with student-sponsors at lounge parties. The pilot program, when utilized with other newly implemented event management strategies, successfully changed the dynamic of student-sponsored events held at the Barn. In addition, their use significantly reduced the cost of holding events in that facility.

Increased presence of staff (i.e., graduate and professional staff, night security, law enforcement) in the Quad and other areas of campus where students are active in the evening

In the Fall semester, WFUPD and night security began increasing their presence in the Quad area, around lounges, and other areas of campus where students are active in the evening. Dean of Students graduate and professional staff also began regularly attending evening events on campus to better understand the social environment and needs of students when classes are not in session. Staff observations and post-

REPORT OF THE WFU POLICE ACCOUNTABILITY TASK FORCE

event de-brief sessions with student sponsors continue to inform the development of new event practices, resources, and leadership development training.

Key Outcomes: Decreased cost of events held at The Barn, more welcoming environment for event sponsors and their guests

Kappa Kappa Psi/NPHC event at the Barn, in September 2014:

- *Entrance-Egress procedures:* 570 wristbands were distributed on-site; Three check-points to (a) verify student identification, (b) tickets, and (c) wrist-bands; Each check-point utilized a barricade system with bike racks; If attendees left the facility for any reason, re-entry was not permitted
- *Security presence:* Three University Police, Six Winston-Salem Police, Seven Rhino/out-sourced event staff
- *Total cost for security:* **\$2,600**

Kappa Kappa Psi/NPHC event at the Barn, in January 2015:

- *Entrance-Egress procedures:* Eventbrite (on-line ticketing); One check-point was used to verify student identification; 2-3 bike racks were used to guide attendees into a line near the entrance; Attendees can leave and re-enter the facility utilizing the on-line ticketing system
- *Security presence:* One University Police, Five Rhino/out-sourced event staff, Five Event Resource Managers (students)
- *Total cost for security:* **\$840**

Recommendations for WFUPD

- The WFUPD should continue efforts to partner with student event hosts and their advisors before and during events (as needed) to improve management at student sponsored events.
- The WFPD should initiate programs, resources, and interactions that increase student understanding about the types of behaviors that raise concern and/or will likely attract attention from law enforcement at student sponsored events. The initiatives should include recommendations about the ways students should respond if approached. Special attention should be given to those organizations hosting events with alcohol in lounge spaces on campus.
- The WFUPD should continue to increase presence of security and law enforcement staff in the Quad and other areas of campus where students are active in the evening.

REPORT OF THE WFU POLICE ACCOUNTABILITY TASK FORCE

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- The WFUPD should support expansion of the Dean of Students' Event Resource Manager (ERM) program. This may include design and facilitation of training for ERM staff and support for the development of protocols that insure shared understanding and coordination between ERM and law enforcement specific to risk identification, early-intervention, and response.

Recommendations (General)

Continue efforts to partner with student leaders and advisers

Efforts to openly communicate with student event sponsors and their advisers about concerns associated with their events has resulted in shared decision-making and greater student-ownership for management of their events. The aforementioned reforms were implemented in partnership with students, and with the goal of supporting the success of their events. This practice should be continued with events at the Barn and lounge parties.

Expand the Event Resource Manager (ERM) program

During fall 2014, ERM's were utilized at the Barn and were dispatched to interact with student leaders responsible for management of other programs around campus. Interactions with lounge party sponsors during fall 2014 demonstrate the need for increased education about issues associated with events at lounge parties and ways the Event Resource Managers can be utilized to lower risk of incidents at their events. As this program expands, it is important to improve the ERM training program, and formalize safety protocols. In addition, ERM's should receive extensive by-stander training with the goal of increasing early interventions on campus to decrease improper conduct. When fully developed, the ERM program will increase the visibility and presence of trained staff on campus during the evening hours.

Assessment

Implement a formal assessment plan to gather data about event sponsor and guest experiences at evening events on campus.



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6. COMMUNITY ENGAGEMENT

Consultants' Recommendation:

Communication between the University and Campus Police needs to improve. The Chief of Police and senior staff must open up lines of communication through more Town Hall meetings, Chats with the Chief and other open forums. In addition, it is strongly recommended that Chief of Police hold mandatory quarterly meetings with the entire Police Department. These meetings will provide opportunities to keep the organization philosophy and goals out front and help address potential problems.

Current Status

Several members of the PATF attended the Trust Talks held on March 19, 2015 as one means of assessing efforts to bridge the gap between campus police and students. The overwhelming majority of those in attendance were police officers from either the Winston-Salem Police Department or the WFUPD. Students were underrepresented. There were approximately ten students, twenty Winston Salem Police, and ten WFU police. The Assistant District Attorney participated as well. The PATF members in attendance reported to the full PATF their concerns regarding the lack of diversity of opinions in dealing with the trust issue between students and police.³

During the large group discussion at the Trust Talks, the WSPD assistant chief opened the talks by stating that Winston Salem is not Ferguson or the University of Virginia. He explained the duties of a police officer in relation to the city area around WFU. Wanda Allen-Abraha of the Winston-Salem Human Resources Department made clear that the evening was not a "bashing session." Instead, attendees were there to exchange information and perspectives. WSPD Chief Roundtree then spoke about how the media distorts police behavior. As the assistant chief had already stated, Roundtree emphasized again that the WSPD is not Ferguson; they are a unique police force empathetic to the Winston-Salem and Wake Forest community.

³ Specifically, the Task Force members noted that both the PATF and Trust Talks should include a broader section of the community, perhaps a defense attorney or someone with experience investigating police misconduct.



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The PATF members in attendance believed that this portion of the session heavily emphasized the law-enforcement viewpoint that they were “underappreciated” and “misunderstood.”

- After the large group discussion, there were four small group sessions during which groups discussed the following points. The group discussed how our community perception of the police originated. Racial profiling on campus was identified as a critical issue. The groups also discussed whether police treat all students equally. Police tended to believe that students were treated equally, while students expressed the view that this was not true. The groups talked about the level of comfort and trust between students and police varied. Participants noted that the police are resentful of students who hold themselves out as experts on the law because they are “pre-law.” Additionally, there was a discussion about the stereotypes that the police and community members have of each other. Both students and officers noted that there was not much neutral interaction between police and students, and both sides agreed.

The groups talked about “how safe WFU is”. Here, participants agreed “safe” was a relative term. Commenters opined that while the entry gates present a wonderful marketing tool for parents, they do not necessarily make the campus any safer than it would be without gates.

The discussion also touched on whether there are pressing issues of which police and students should be aware. Here, participants noted that Student Health closes down during Spring Break, which creates increased stress for police officers, who are then forced to take suicidal or depressed students to Baptist rather than Student Health.

Two useful outcomes emerged from these Trust Talks. First, participants briefly discussed the rates of sexual assault on campus. Second, the WSPD officers noted that the life and safety of WFU students is their primary concern when they are breaking up parties. Police noted that their first task upon entering a party is to ensure that all students are conscious. If not, they transport them to the hospital. Students at the Trust Talks were surprised to hear that police care about their safety, and not just about issuing citations.

Members of the PATF who attended the Trust Talks noted that there do not seem to be many WFUPD police initiatives to help bridge the gap between police and students. The WFUPD has organized some “coffee chats” in various buildings, but small numbers of students stopped by, and the consensus is that meaningful dialogues rarely seem to occur during these



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talks. While these interactions and initiatives may be beneficial, the possibility for deeper interaction could be improved. Some students at the Trust Talks suggested intramural sports competitions: softball, kickball, etc., to allow police and students to interact socially and get to become acquainted with one another outside of their status as officers and students.

Recommendations

The PATF recommends that WFUPD:

- Increase social interaction between police and students to increase the level of trust and understanding on both sides.
- Require police to attend several academic events each year to ensure that police see our students in their best light, rather than only at night when they may be engaging in disruptive behavior.

EXHIBITS

EXHIBIT 1-WFUPD DEMOGRPAHIC DATA BY RACE AND GENDER



REPORT OF THE WFU POLICE ACCOUNTABILITY TASK FORCE

EXHIBIT 2- BODY CAMERA POLICY (REVISED APRIL 2015)

EXHIBIT 3-TRAINING (PROVIDED BY WFUPD)

EXHIBIT 1

WFUPD DEMOGRAPHIC DATA



REPORT OF THE WFU POLICE ACCOUNTABILITY TASK FORCE

66 Employees (40 non-sworn / 26 sworn)

Summary / all employees

Race	Count
Black or African American	8
Hispanic/Latino	1
Race and ethnicity unknown	1
White	56
Grand Total	66

Summary / non-sworn

Race	Count
Black or African American	7
Hispanic/Latino	0
Race and ethnicity unknown	1
White	32
Grand Total	40

Summary / sworn

Race	Count
Black or African American	1
Hispanic/Latino	1
Race and ethnicity unknown	0
White	24

Gender Summary / non-sworn

Gender	Count
Male	26
Female	15



REPORT OF THE WFU POLICE ACCOUNTABILITY TASK FORCE

Grand Total	41
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Gender Summary / sworn

Gender	Count
Male	21
Female	4
Grand Total	25

Grand Total	26
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EXHIBIT 2



REPORT OF THE WFU POLICE ACCOUNTABILITY TASK FORCE

WAKE FOREST UNIVERSITY POLICE GENERAL ORDER

		NUMBER 111
SUBJECT VieVu Camera System		NO. PGS. 3
DATE OF ISSUE April 21, 2014		EFFECTIVE DATE April 21, 2014
DISTRIBUTION All Divisions	AMENDS	THIS ORDER CANCELS N/A

PURPOSE: *The purpose of this order is to provide employees of the Wake Forest University Police Department with general guidelines for the use, management, storage and retrieval of audio/visual recordings with the VieVu camera system (or an equivalent body worn camera system).*

I. Use

- A. The Department will provide both sworn and non-sworn uniformed personnel (referred to hereinafter collectively as “officers”) with a wearable video camera (VieVu or an equivalent) designed to record both audio and visual. The system is part of the issued equipment for uniformed personnel.
- B. Recordings from the VieVu recording system may be used to provide documentary evidence of an incident.
- C. The VieVu recording system should be used by officers trained in the use of the VieVu system to record:



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- a. Non-routine officer encounters with members of the public when acting in an official capacity. This includes questioning of suspects or witnesses in the field, pursuits of vehicles or individuals, searches and inventories of vehicles or persons, and arrests and seizures;
 - b. Dispatched calls;
 - c. Traffic stops; and
 - d. When transporting non-departmental personnel in the rear compartment of a University Police vehicle.
- D. If circumstances prevent recordings at the beginning of an event, the officer shall begin recording as soon as practical. In addition, recordings of the above should occur even when the event is out of view of the camera.
- E. At the commencement of any recording, the officer should, where practicable, make a verbal announcement to indicate why the recording has been activated. If possible, this should include:
 - Date, time and location;
 - Confirmation to those present that the incident is being recorded using both audio and video.
- F. Unless there is reasonable suspicion to believe that criminal activity is occurring or will occur, officers may not intentionally record in places where a heightened expectation of privacy exists, such as in restrooms, locker rooms, in Student Health Service or in residence hall dorm rooms, unless for a direct law enforcement purpose, such as a crime in progress or the recording of the location is material to a criminal investigation.
- G. Recordings should continue uninterrupted from commencement of recording until the conclusion of the incident or resumption of general patrolling. Prior to concluding the recording, the officer should make a verbal announcement to indicate the reason for ending the recording, and should state:
 - Date, time and location;
 - Reason for concluding the recording.
- H. All recordings captured during the scope of the officer's duties are property of Wake Forest University, and are not to be viewed, duplicated, disseminated, destroyed and/or used without legitimate purposes or in violation of applicable laws and this General Order.
- I. Officers shall not have an expectation of privacy regarding the recording of their work activities.



REPORT OF THE WFU POLICE ACCOUNTABILITY TASK FORCE

II. Operating Procedures

- A. Only officers who have received training in the operation of the VieVu equipment and have demonstrated proficiency in its proper operation, use and care will be authorized to operate the equipment.
- B. Officers assigned a VieVu recording system are responsible for the proper care and operation of the equipment according to manufacturer recommendations and departmental policy.
- C. Prior to going on and while on duty, officers will ensure that the equipment is fully charged and operating properly. Officers should promptly notify their supervisor of any malfunction or problems with the equipment. The supervisor should make arrangements to have a backup unit issued prior to the officer going on duty. NO officers will go on duty without a working camera except with the permission of the Chief of Police or his/her designee. Such permission will be granted in limited circumstances, such as in the event of an emergency.
- D. The VieVu should be positioned on the uniform in such a manner as to facilitate the best audio and visual recordings of an incident.
- E. The VieVu should be activated immediately when responding to or reacting to an incident.
- F. Deactivating the VieVu equipment should only occur after an investigation and/or enforcement action is complete and the officer or violator has left the scene. If there is an equipment failure resulting in a deactivation, the officer must notify their supervisor and the reason for the deactivation.
- G. At the end of a shift, if any recording has taken place, officers will have the data on the VieVu downloaded into the appropriate file. Each camera is assigned a file through the VERIPATROL software. This file is set up at the time the camera is activated and assigned to an officer.
- H. If two officers respond to an incident, both officers should activate their equipment.
- I. During a shift, officers may review portions of the recordings for the limited purposes of verifying identification or a vehicle license number or to review an incident for statement accuracy. Such requests may be done after first obtaining permission of the officer's supervisor. Officers may NOT destroy, delete, or alter a recording, or any portion thereof, nor may they make copies of any recording for personal use.

III. Retention

- A. Recordings will be stored and retained by the Department for a minimum of 180 days, or until all criminal, civil or administrative cases to which the recording are relevant have been adjudicated



REPORT OF THE WFU POLICE ACCOUNTABILITY TASK FORCE

- B. At the time the recording is originally made, or as soon after as reasonably possible, officers are responsible for notifying the on duty supervisor when data needs to be archived beyond 90 days. Supervisors have the ability to move data to disk or mark data to be saved permanently on the server for investigative purposes.
- C. All recordings are considered confidential and part of a case file. No recordings will be moved to a DVD without the permission of a supervisor or command level officer. This will be primarily for:
 - Use, if requested, for on-campus judicial or administrative review.
 - Use in a criminal proceedings. If a case is being adjudicated in the State judicial system the appropriate imagery should be placed on a DVD and the investigating officer will have the DVD entered into the property/evidence process as evidence. Once the case is adjudicated, the investigating officer will notify the Property/Evidence Custodian of the adjudication and the DVD will be destroyed.
- D. During a personnel complaint or an internal investigation, a copy of the recordings related only to the incident or allegation shall be moved to a DVD at the request of the investigating officer. The investigating officer shall retain custody of the DVD until completion of the investigation. Upon completion of the investigation, the DVD shall be placed in the IA file and placed in the appropriate personnel file in the Chief of Police's office.

IV. Department Review

- A. Recordings generally will not be routinely or randomly reviewed to monitor an officer's performance.
- B. A supervisor may conduct a performance review of an officer's recordings in the event of:
 - 1. A personnel complaint.
 - 2. A criminal investigation.
 - 3. An internal investigation.
- C. Reviewing recordings for training purposes, such as FTO, is acceptable.
- D. Officers may review their own recordings.
- E. In no event shall any recordings be used or shown for the purpose of ridicule or embarrassing any individual.
- F. Officers may view another officer's recordings with a supervisor's approval to seek additional details or information pertaining to an investigation.

V. External Review



REPORT OF THE WFU POLICE ACCOUNTABILITY TASK FORCE

A. Recordings maintained by the Department will not be made available for external review except:

1. Upon consultation with Legal Counsel, approval of the Vice President of Campus Life and Chief of Police; and/or
2. By a valid court order or court process, or when otherwise required by law.

VI. Compliance

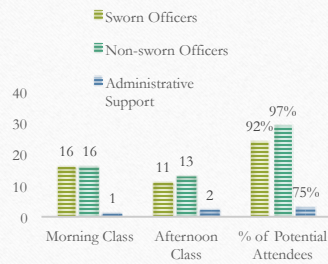
Concerns regarding possible violations of this General Order reported to the University Police Department will be reviewed and addressed in accordance with the General Orders of the Department concerning an officer's non-compliance with departmental orders.

EXHIBIT 3 (PROVIDED BY WFUPD)

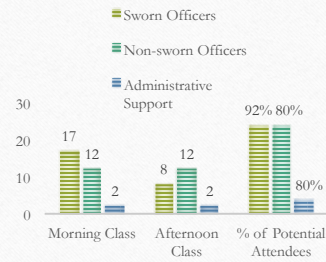
REPORT OF THE WFU POLICE ACCOUNTABILITY TASK FORCE

Cook Ross Unconscious Bias Training

- Session 1—December 2, 2014

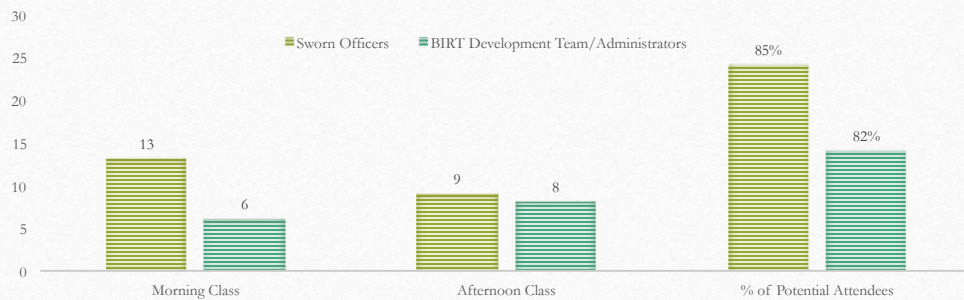


- Session 2—January 27, 2015



REPORT OF THE WFU POLICE ACCOUNTABILITY TASK FORCE

Margolis Healy and Associates BIRT Training* January 16, 2015



*This training was for Sworn Officers only, as Non-sworn would not be involved in the investigative process of Bias Incident Reporting.