



**CITY OF EAST PALO ALTO
POLICE DEPARTMENT**

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**Police Department Creates Professional Standards Unit
“Adopts Comprehensive Officer-Complaint Process”**

Over the past two years, the Police Department has implemented a series of police-reform efforts to enhance our professionalism and level of accountability to the community. In July, the Police Department restructured from a traditional model of policing to a more progressive model called Area Command. The Area Command structure is based on two core principles: Geographic and Managerial Accountability.

As part of the managerial accountability component, the Police Department eliminated the traditional Internal Affairs Unit and replaced it with the Professional Standards Unit (PSU). Under the previous structure, Internal Affairs was commanded by the Administrative Lieutenant who was responsible for oversight of citizen complaints, in addition to a wide-variety of administrative duties, such as purchasing and budget, grant management and special projects.

Under Area Command, these administrative duties have been re-assigned to the newly created Administrative Services Manager (ASM) position – a civilian position equivalent to Captain. Consequently, the Professional Standards Unit, which is comprised of a Sergeant, will report directly to the Chief of Police and its duties will focus exclusively on the oversight of the community complaint and internal audit and inspection processes.

For example, the PSU will:

- Thoroughly investigate all complaints filed against officers and civilian employees of the Police Department, and when appropriate, coordinate those investigations assigned to an outside investigator
- Create a monthly report that outlines the number and type of complaints filed against officers, as well as the status of each investigation. This report will be published on the website.
- Track all complaints and uses force to identify potentially problematic behaviors and trends
- Conduct internal inspections and audits of operational and administrative systems
- Conduct use of force investigations to ensure compliance with policy
- Develop and maintain an Early Intervention System (EIS) that tracks officers' at-risk behaviors and identifies potentially problematic trends and behaviors
- Conduct “Integrity Checks” to ensure staff, supervisors and managers comply with all policies. Integrity checks will involve community members
- Serve as the Departmental training coordinator to ensure the Department maintains compliance with State training requirements

The PSU is a critical component of Area Command and will help to enhance the culture of accountability within the Police Department and create a complaint system that instills public trust and confidence.

To further strengthen the complaint process, the Department has drafted a new comprehensive complaint policy that will ensure timely, objective and thorough investigations of complaints filed against the police. The key points of the policy include, but are not limited to:

The Department will:

1. Accept all complaints (including anonymous)
2. Provide a complaint and compliment phone-line
3. Provide a complaint brochure that outlines the complaint process (instituted last year)
4. Provide an online complaint process (instituted last year)
5. Provide four (4) locations throughout the City to allow the community to file complaints without going directly to the Police Department (instituted last year)
6. Require supervisors to carry the complaint forms and brochures and provide to the community at their request
7. Establish a complaint classification system:
 - a. Class 1 – serious violations and crimes
 - b. Class 2 – other violations
 - c. Service – complaints about Departmental services or the lack thereof
8. Formalize the types of complaint investigations
 - a. Formal Investigation – for all Class 1 and Class 2 investigations
 - b. Inquiries – service complaints
9. Require all investigations be completed no later than 90 days after complaint was initiated, unless otherwise authorized by the Chief of Police.
10. Ensure investigations are thoroughly investigated, including taking statements from all witnesses, collection of evidence, and the identification of all violations.
11. Ensure the Department provides continual investigation updates to community members.
 - a. Complainants shall be notified of status of investigation every 30-days.
 - b. Complainants shall be notified, in writing, of adjudication of finding.
 - c. Complainant shall be afforded opportunity to meet with Chief of Police if not satisfied with investigation.

The draft policy is under final review and will be published on the website once completed.

Respectfully,

Ronald L. Davis
Chief of Police

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