

2024 IPA WORKPLAN

This workplan intends to preview the primary tasks which will be undertaken by the IPA in 2024 pursuant to its duties and responsibilities.

ORGANIZATIONAL WELLNESS AND DEVELOPMENT

The IPA will continue to work with command staff to best understand the landscape of policing in Petaluma. This will include discussions relative to the mission of the Department, its philosophy on policing Petaluma with special emphasis on how it engages in community policing. In addition, we will explore training needs and opportunities for the Command Staff, so as to best equip them to serve the people of Petaluma with an underlying philosophy of continuous improvement. Lastly, we will work with command staff to identify and recommend any additional resources, including additional personnel, equipment, or technology solutions, necessary to enable the Professional Standards Division, to do its job efficiently and effectively.

The IPA will provide a training to supervisors and line staff on the IPA's 360-degree review process during March 2024 visit. This will include delivery of a detailed explanation of what we look for in assessing the different aspects of an incident. We are hopeful that this training can be delivered in person during our March visit.

PSAG

The IPA will serve as a subject matter expert for the development and implementation of the PSAG. The PSAG was created to function as a community resource for the City of Petaluma for forming new strategies, developing community policing concepts, increasing public awareness of safety issues, and addressing police-community relations. The IPA, along with the City Manager's Office and the Office of Chief of the Police, will work collaboratively with the PSAG to ensure its work progresses productively. The PSAG is intended to provide a forum for discussions concerning community concerns and the goal is to have a broad spectrum of viewpoints represented.

TIMING OF TASK

The IPA anticipates that the IPA will assist the City in its efforts to establish PSAG in the first quarter and work with PSAG on substantive matters starting in the second quarter of 2024.

POLICIES AND TRAININGS REVIEW

Among the IPA's most important responsibilities is the mandate to review the internal policies and trainings of the PPD and to evaluate how those policies and trainings conform to, or depart from, established best practices. Although PPD policies and trainings span a broad array of subject areas—from patrol operations to departmental management—this audit focuses on areas of particular concern to Petaluma community members and officials and selects different policies and training to review and assess on an on-going basis. To ensure alignment with best practices in policing and enhance effectiveness in police-community encounters, the following policies and trainings will undergo thorough review and revision by the IPA in full collaboration with PPD during 2024. The IPA will conduct a comprehensive assessment of policies and training, considering current best practices, legal standards, community expectations, and the specific needs of Petaluma. Any necessary revisions will be made with the goal of promoting transparency, accountability, and fairness in policing while ensuring the protection of individual rights and safety.

THE IPA WILL BE REVIEWING THE FOLLOWING POLICIES AND TRAININGS IN 2024¹:

- a. 4th Amendment Policies
 - i. Investigative encounters
 - 1. 436- Contacts and Temporary Detentions
 - ii. Frisk/searches
 - 1. 322- Search and Seizure
 - iii. Arrest
 - 1.
 - iv. 306-Handcuffing and Restraints
- b. Temporary custody of juveniles
 - i. 324- Temporary Custody of Juveniles
- c. Standards of Conduct
 - i. 340-Standards of Conduct
- d. Use of Force
 - i. 300- De-escalation and Use of Force
 - ii. 308-Control Devices and Techniques
- e. Biased Policing
 - i. 402- Bias Based Policing
- f. Mission and Core Principles²
- g. Foot pursuits
 - i. 458- Foot Pursuits

In addition, the IPA will also review the trainings on vehicular pursuit (the policy itself was reviewed and updated in 2023) and the policy regarding personnel complaints so it can be updated as necessary with mediation protocols (to be discussed below).

TIMING OF TASK

First Quarter Reviews: During the first quarter of 2024, the IPA will review policies and trainings related to the 4th Amendment, specifically regarding investigative encounters, temporary detention of juveniles, frisk/searches, arrest, and handcuffing. These policies and trainings govern crucial aspects of police-community encounters, including investigative encounters.

Second Quarter Reviews: During the second quarter of 2024, the IPA will review policies and trainings related to use of force and bias-based policing (including implicit bias). The IPA will review protocols governing the use of force by officers to ensure they align with legal standards, emphasize de-escalation techniques, and prioritize the preservation of life and safety. Policies and trainings related to bias-based policing will be evaluated by the IPA. In

¹ If there is a relevant policy that already exists, those have been identified. This list is to reflect the general topic areas that the IPA plans on discussing with PPD in 2024.

² We will collaborate with the department to discuss and potentially revise its stated mission and core principles to ensure that both align appropriately with a policing philosophy that is rooted in continuous improvement and service to, and full appreciation of the community.

doing so we will review collateral policies relative to RIPA data collection and analysis. It is anticipated that the IPA will work with PSAG in soliciting community input on these policies during its review process.

Third Quarter Reviews: During the third quarter of 2024, the IPA will review policies and trainings related to foot pursuits, standards of conduct and mission of the department, and trainings related to vehicular pursuit. Policies and training on standards of conduct and mission will be reviewed in order to confirm that these policies form the bedrock for all other policies and training. Policies and trainings regarding foot and vehicular pursuit will be reviewed to ensure officers are prepared to safely and effectively conduct pursuits while minimizing risks to all parties involved. Again, the IPA will work with PSAG in soliciting community input on these policies during its review process.

Fourth Quarter Reviews: The fourth quarter will be reserved to address any policies and trainings that were delayed from being assessed throughout the year.

ON SITE VISITS

The IPA will be on site periodically throughout the year, as requested by the City and the community and during which time the IPA will participate in ride-alongs with the officers to speak with officers and better understand the community.

REVIEW AND ASSESSMENT OF INCIDENTS OF USE OR DISPLAY OF FORCE, PURSUITS, AND CRITICAL INCIDENTS

Throughout the entire year, the IPA will continue our review and assessment of incidents of use or display of force, pursuits, and any critical incidents utilizing our 360-degree assessment approach. This means we examine not only whether the use or display of force or pursuit was within policy, but whether collateral aspects of the incident consistent with operational best practice. We also review supervisory investigations both in terms of completeness and conclusions. With respect to each assessment, we make relevant findings and recommendations and note any exceptional conduct. We also discuss with command staff whether anything could have been done differently to have potentially achieved a better outcome.

In these reviews, we utilize body-worn camera footage to better understand the circumstances involved in the police encounter. Body-worn cameras have become an essential tool in modern policing, offering an objective viewpoint of officers' interactions and encounters. In order to utilize BWCs to their fullest potential it is imperative that there is full compliance with PPD policy relative to mandatory activation and continued recording of police encounters. In our audit process, we will therefore review BWC footage to ensure compliance with those departmental policies and procedures including: the timeliness of camera activation, continuous recording, appropriate termination of recording, and adherence to audio guidelines. Our goal is to ensure that BWCs are used effectively to capture a clear and comprehensive record of events, which, as noted, is crucial for accountability and transparency.

In our review of any of these incident types we employ our 360-degree review methodology, which involves a holistic assessment of various aspects of law enforcement activities. This approach ensures a thorough examination of incidents from multiple angles, considering not only the level of compliance with each implicated policy, but also the question of whether a particular incident might have been handled in a different way to have potentially obtained a better result.

GENERAL METHODOLOGY FOR THE REVIEWS

Our 360-degree assessments review the following:

- Compliance with BWC policy
- How the incident arose (self-initiated or dispatched or direct citizen complaint)
- Pre-incident Planning and Decision Making
- Legal predicate for initial contact with subject
- Communication with subject
- De-escalation of contact
- Evaluation of any Use or Display of Force (including de-escalation, duty to intervene, medical response, relief protocol adherence)
- Evaluation of any Pursuit
- Evaluation of any Complaint (including the incident itself and the investigation of the complaint)
- Evaluation of Fourth Amendment issues including any restraint, frisk or search
- Evaluation of any First Amendment issues including freedom of speech and assembly
- Professionalism of Officers
- Tactics of Officers
- Policy implications of incident
- Equipment implications of incident
- Documentation by officers including completion of RIPA form when required
- Supervisory review of incident
- Any exceptional conduct by any involved officer

Each review is grounded in objectivity, thoroughness, and a commitment to best practices. Our reviews are fully documented with recommendations for improvement, and in cases of exceptional conduct, for commendation. Issues which are identified will be related to PPD for coaching, mentoring and training, and, it is expected in rare instances, discipline during our weekly check-ins.

By conducting our 360-degree reviews, our process aims to provide a comprehensive picture of police operations, highlighting areas of excellence and identifying opportunities for improvement. This approach aligns with our commitment to continuous improvement in law enforcement, ensuring that officers not only adhere to policies but also respond effectively to the evolving needs and expectations of the communities they serve.

Indeed, the aspiration is that the process which we employ of critical self-evaluation becomes a cornerstone of the Petaluma Police Department's (PPD) culture and becomes integrated in both supervisory reviews and self-assessments by officers. Such integration holds the potential to foster a continuous learning environment where officers reflect on their actions, particularly considering alternative approaches to incidents. This kind of introspection is invaluable, cultivating a mindset geared towards growth and improvement; it will not only enhance individual officer performance but will also contribute significantly to the department's overall evolution. Such a practice will underscore a commitment to excellence in policing, encouraging officers to consistently evaluate and elevate their approach to law enforcement, thereby driving departmental progress and reinforcing community trust.

In order to achieve this, the IPA will share with PPD command staff and supervisors with the rubric the IPA utilizes in reviewing these incidents. After sharing the rubric in February of 2024, the IPA will provide a 2- hour training to supervisors on how the IPA conducts its 360-degree review process during March 2024 visit.

REVIEW OF COMPLAINT INVESTIGATIONS

The IPA will also continue to review all complaint investigations conducted by, or on behalf of, the department and any corrective measures taken by the department in the context of a particular complaint. These reviews will be conducted throughout the year, and will determine whether an investigation is complete, thorough, objective, and fair, and whether there are any aspects of the investigation with which the IPA disagrees. To the extent that the IPA disagrees with or objects to any portion of PPD's investigation or corrective measures undertaken by the department, it is incumbent on the IPA to work with the Department to address those disagreements.

AUDITS

In 2024, the IPA will conduct two additional audits.

DETAILED ANALYSIS OF TOUR (DATA) AUDIT

The Detailed Analysis of Tour (DATA) audit is a review of police operations over a preselected shift or shifts. The audit is structured to evaluate overall compliance (beyond that evaluated through our other activities) and delve deeply into selected incidents using our 360-degree methodology. This review will occur once a year for a preselected specified time period of no more than one week.

In these reviews, we will start with the roster for the particular shift being audited. We will then chronologically list and review all relevant data points, including Computer Aided Dispatch events, body worn camera activations, contact data collection (RIPA) forms completed, traffic and non-traffic summons issued, summary arrests, pursuits, and reported uses of force. This exhaustive listing will provide a comprehensive view of the activities during the shift and allow for a quick analysis with respect to BWC activation and RIPA compliance.

The primary goal is to assess how policies and training are being applied in real-world situations beyond those covered by our other reviews. We aim to understand the decision-making process of officers in various scenarios and identify areas where alternative approaches could potentially be more effective. Special attention will be given to encounters involving vulnerable populations, such as the unhoused or individuals with psychological issues, to evaluate opportunities for alternative interventions to arrest.

By scrutinizing all aspects of a given shift, these periodic reviews will ensure a thorough and nuanced understanding of operational practices, highlighting both compliance and areas for improvement. This approach is pivotal in ensuring that the PPD's actions are consistently aligned with the consent decree mandates and community expectations.

We will review the combined chronological detail of the shift activity to determine if there are anomalies which might indicate a lack of adherence to policy. These anomalies could include:

- CAD assignments in which a BWC would be expected but is not present.
- BWC activations without either a CAD entry or RIPA form.
- A citations without a BWC.
- An arrest without a BWC.
- A RIPA form without a BWC.

If any of the incidents audited were reviewed by any of the supervisors prior to the audit, supervisory actions will be evaluated to determine whether the supervisor sufficiently evaluated the incident and identified potential issues and remediated them appropriately.

BWC AND RIPA FORM COMPLIANCE

We will review BWC video for each RIPA form completed. In doing so, we will determine whether the RIPA form was completed accurately. We will note any issues with the accuracy of the form, with BWC compliance, with the constitutionality of the stop, and the post stop actions of the officer. We will review BWC video for certain categories of CAD calls to determine if RIPA forms should have been completed but were not. Some of these incidents will have been reviewed already in our weekly review. We will conduct a 360-degree review, as described above, for a sample of incidents which have not been reviewed.

We will also review BWC video footage captured but not associated with a RIPA form, arrest or citation, in order to determine whether there was an encounter or use of force which should have been reported.

ARREST AND CITATION COMPLIANCE

We will review BWC video for each arrest and citation not already reviewed pursuant to our weekly reviews or RIPA form inquiry, to determine if arrests were compliant with policy and whether any other issues exist employing our 360-degree process detailed above.

For misdemeanor arrests, we will determine the ultimate outcome of the case paying special attention to dismissals, especially for Failure to Obey a Lawful Order, Resisting Arrest, Criminal Trespass, and related offenses.

USE OF FORCE COMPLIANCE

Typically, uses of force should have already been reviewed as part of our ongoing reviews. We will ensure that is the case, and to the extent that there are any uses of force not previously reviewed we will review those pursuant to our 360-degree protocol.

BACKGROUND INVESTIGATIONS FILES AUDIT

The second audit is the audit of completed background investigations for all candidates who applied to be a police officer with PPD, and they will be evaluated to ensure that they are thorough, objective, and compliant with legal standards. This audit will be ongoing as PSD receives completed background investigations files.

RIPA ANALYSIS

If requested by the City, the IPA will conduct a Racial and Identity Profiling Act (RIPA) analysis to identify those disparities which exist, in order to potentially inform efforts to address such disparities and promote fair and equitable policing practices.

TIMING OF TASK

If requested by the City for Calendar Year 2023, the analysis will be performed in the second quarter of 2024.

REPORTING

Lastly, the IPA will also begin drafting the 2024 annual report during this quarter, collecting necessary information so the IPA can start writing the annual report in January of 2025.