

Model Policy

PURPOSE

This policy establishes a mechanism for the automated review of the department's body-worn camera (BWC) video utilizing the TRULEO application, a Criminal Justice Information Services compliant software as a service technology solution that automatically analyzes and categorizes BWC data. Moreover, this policy reinforces the department's commitment to the ongoing professional development and recognition of its officers and the need to maintain the integrity and security of personal identifiable information, civilian privacy, and the department's computer systems.

SCOPE

This policy applies to all members of the department who access the TRULEO application or who are assigned or are otherwise responsible for BWC or in-car camera hardware, software, or data (including audio and video recordings) relating to these devices.

OBJECTIVES

The department is leveraging this BWC data analytics technology to streamline operations, mitigate risks, enhance legitimacy, and facilitate individualized recognition to increase morale, ignite performance, and promote police professionalism. To facilitate this, the TRULEO application utilizes a proprietary audio analysis engine that automatically categorizes all of the department's BWC data enabling leaders, trainers, and public information officers to highlight positive interactions and promote exemplary performance.

GOALS

As a result of implementing the TRULEO application and associated policies and best practices in performance management, the department seeks to optimize the quality of services provided by patrol operations while increasing overall professionalism by setting the following goals.

➤ *Within one month of implementing this policy:*

- Review of BWC videos.
 - Rescind all procedures related to the random review of BWC videos.
 - Establish and maintain a baseline rate of 95% or more automated reviews of BWC videos.
 - Reduce and monitor the administrative burden of BWC video reviews to ensure the department expends less than a half hour per week per supervisor.

➤ *Within three months of implementing this policy:*

- Develop and implement a proactive training and performance recognition program based upon a set of professional ethics, commitment to continuous learning, and advancement of organizational justice.
 - Utilize the TRULEO application's TRU Data metrics to proactively identify and regularly train all members of the department on best practices and emerging trends in police service delivery.
 - Promote the use of more effective communication strategies, to include offering explanation and de-escalation, as integral to professionalism and the

reduction of incidents of non-compliance and avoidable uses of force.

- Utilize the TRULEO application's praise and proficiency functions to recognize and promote high performance during community interactions.
 - Share a selection of the best examples of high performance with the department's executive leadership, public information, and training management teams.

- *Within six months of implementing this policy:*
 - Establish measurable benchmarks for the quality of service provided by patrol operations.
 - Utilize the TRULEO application's TRU Data metrics to assess the quality of services provided over time and across organizational units.
 - Regularly evaluate the performance of all members of the department, training them to the highest standards, and make specific individualized non-punitive recommendations for their continuous improvement.

- *Within one year of implementing this policy:*
 - Incorporate the TRULEO application's TRU Data metrics in a non-punitive manner into the annual performance evaluation and candidate identification and selection for promotion and special assignment processes.
 - Mitigate risk and liability by proactively identifying areas for improvement with a focus on low frequency high risk situations.

- Evaluate the department's standing within the community, to include perceived levels of procedural justice and legitimacy, as reflected in the annual public sentiment survey.
 - Examine the results of this feedback and develop a response plan that clearly demonstrates a commitment to transparency and accountability to the community.
- Evaluate the department's standing with its own members, to include perceived levels of commitment to the department, morale, and organizational justice, as reflected in the annual employee sentiment survey.

DEFINITIONS AND REFERENCES

The TRULEO application provides all users with an in application help center populated with support features and resources including a user guide, administrator guide, definitions of terms, and workflow explanations. The help center also provides all users with access to a list of frequently asked questions, chatbot, and contact information for the TRULEO customer success team.

PROCEDURE

Administrator

1. Assist the BWC program coordinator in ensuring the integrity and operation of the department's BWC program.
 - a. Ensure all BWCs are promptly returned to a docking station at the end of each shift to facilitate the uploading of data into the BWC video management system for analysis by the TRULEO application.

2. Act as the system administrator and manage the TRULEO application to ensure it is used effectively and securely in the furtherance of the department's goals and objectives.
 - a. Evaluate and revise plans to achieve the department's goals and objectives.
 - i. Regularly review and report on the status of department goals, objectives, risks, and achievements identified by the Truleo application's TRU Data metrics with executive leadership, risk mitigation, and training management teams.
 - ii. Provide information and insights that promote data driven decision making, policy evaluation, and a clearer understanding of the department's overall performance.
 - b. Perform all project management and logistical oversight functions.
 - i. Evaluate compliance with department policies and promptly address deficiencies.
 - ii. Establish an open line of communication with the TRULEO customer success team.
 - Act as department liaison and system administrator during recurring project management meetings.
 - iii. Establish and maintain department policy settings within the TRULEO application.
 - Update user profiles, access rights and permissions, groups, and related settings, as needed.
 - Configure and monitor the department's application programming interface (API) and single sign-on (SSO) integration.
 - Analyze administrative logs and related information.
 - iv. Ensure all members of the department have the appropriate training, skills, and knowledge consistent with their user role to effectively deploy and operate the TRULEO application.

- This includes an understanding of the capabilities, limitations, security risks, and privacy concerns associated with this application.
 - Review and disseminate release notes to keep all members of the department well informed.
- v. Conduct routine audits of the pending human-verification queue to ensure calls are processed in a timely manner.
 - Any call pending human-verification for more than ten days should be brought to the attention of the reviewer assigned for immediate processing.
 - Any call pending human-verification for more than fifteen days should be reassigned to another reviewer for immediate processing.
- vi. Identify and investigate inconsistent applications of human-verification review standards, praise, proficiency, and training referral processes and take appropriate action to correct deficiencies.
 - Conduct recurring training with reviewers to ensure these processes remain fair, unbiased, and closely aligned with the department's goals and objectives.
 - Counsel all reviewers that they are responsible for determining and conducting appropriate follow-up actions required as a result of a BWC video review, consistent with department policies and the directions provided herein.
- vii. Conduct regular audits of utilization and effectiveness of performance recognition and training referral processes.
 - Review performance recognition recommendations made by reviewers and ensure assistance is provided by the public information team, as necessary.

- Review training recommendations made by reviewers and ensure assistance is provided by the training management team, as necessary.
- viii. Develop, share, and ensure the proper use of customized call filters that further the department's goals and objectives.

Reviewer

3. Utilize the TRULEO application and associated policies and best practices in performance management to achieve the department's goals and objectives.
 - a. Evaluate compliance with department policies and promptly address deficiencies.
 - b. Review and disseminate release notes and related information.
 - c. Update system administrator regarding changes to user profiles, access rights and permissions, and group settings.
 - d. Maintain responsibility for determining and conducting any appropriate follow-up actions required as a result of a BWC video review, consistent with department policies and the directions provided herein.
 - e. Ensure consistent, fair, and unbiased application of human-verification review standards, praise, proficiency, and training referral processes and take appropriate action to correct deficiencies.
 - i. Ensure these processes remain closely aligned with the department's goals and objectives.
 - f. Conduct regular assessments of the use and effectiveness of performance recognition and training referral processes.
 - i. Identify and make recommendations for performance recognition.

- Ensure prompt follow-up is coordinated with the public information team, as necessary.
 - ii. Identify and correct performance issues through non-punitive coaching or training at the earliest opportunity and before deficiencies develop into significant problems.
 - Ensure prompt follow-up is coordinated with the training management team, as necessary.
- g. Develop, share, and ensure the proper use of customized call filters that further the department's goals and objectives.
- h. Conduct routine audits of reports prepared in association with calls reviewed to ensure compliance with the department's reporting policies on use of force, search and seizure, arrest, and other incidents requiring documentation.

Enterprise Workflow - Reviewer

4. Log into the TRULEO application regularly, but not less than once every ten days.
 - a. Conduct routine audits of the pending human-verification queue and ensure calls are processed in a timely manner.
 - b. Utilize custom call filters to proactively identify calls of interest.
 - c. Conduct proactive BWC video reviews that further the department's goals and objectives and are focused on generating performance recognitions and training referrals.
 - i. Use discretion in deciding how much or what specific segments of a BWC video to watch as part of a review.
 - ii. Utilize event labels, call transcript, summary, and in-transcript smart search functions to streamline the review process and reduce administrative burden.
 - iii. Revise event labels, call transcript text, and/or designated speaker with the in application editing tool, as necessary.

- iv. Send **praise** to a user who exhibits high performance or who otherwise merits individual recognition.
 - Praise is applied at the call level and relates to a user's overall performance.
 - Praise is visible to and can be filtered by any user with access to that specific call.
- v. Mark specific segments of calls as **proficient** to recognize high performance in context within a call.
 - Proficiency is applied as an event label within a call and relates to a user's performance during a segment of time.
 - Proficiency is visible to and can be filtered by any user with access to that specific call.
- vi. **Bookmark** noteworthy calls for follow-up at a later date.
 - Bookmarks are applied as an event label at a specific time within a call.
 - Bookmarks are applied at the user level and are only visible to the user that generated the bookmark.
- vii. **Assign** calls to other user(s) for follow-up at a later date.
 - Assignments are applied at the call level and are visible to the user(s) designated.
 - Assignments can be made to any user(s), including supervisors, peers, and/or subordinates.
 - Provide descriptive notes and clear instructions about the actions to be taken by the assignee(s), as necessary.
 - ◇ Monitor assignment for reply messages and perform follow-up actions, as necessary.

- ◇ Ensure assignment is promptly acted upon in accordance with the instructions provided and marked reviewed when completed.
- viii. Identify and recognize select examples of high performance by creating **moments** to be considered for use in stories (public information and training assets) by the public information and training management teams.

NOTES

After processing all calls in the pending human-verification queue, reviewers are directed to proactively conduct BWC video reviews that are focused on generating performance recognitions and training referrals. To accomplish this, reviewers are to utilize all of the tools available within the TRULEO application, including customized call filters, event labels, call transcripts, summaries, and in-transcript smart searches. These tools provide reviewers with a more efficient and effective method to review a call than passively watching an entire BWC video. While conducting proactive BWC video reviews, it is left solely to the discretion of the reviewer whether or not there exists a need to watch an entire BWC video. Additionally, the reviewer is to use their discretion in deciding how much or what specific segments of a BWC video they choose to watch as part of their proactive review. This policy is intended to reduce the administrative burden placed upon reviewers and permit a wider assortment (both in call types and members of the department) of BWC video reviews to be conducted. As such, the department will not hold a reviewer accountable for the content of a BWC video, in whole or part, that was not specifically watched by the reviewer.

Refer to the appropriate department policies for guidance on conducting BWC video reviews for cause (e.g. uses of force or complaints of misconduct) as certain types of incidents require that a full investigation be conducted.

The TRULEO application utilizes a proprietary audio analysis engine to generate in application transcript texts and content summaries. Users must carefully review all such materials for accuracy and completeness prior to using it in an official capacity. Users are responsible for any inaccuracies contained within these materials and are accountable for the implications of its use.

ADDITIONAL INFORMATION

Civilian Privacy Protections

The department recognizes that civilians who are not targets of law enforcement investigations will inevitably be recorded on BWC video. These individuals have a fundamental right to privacy which must be respected and protected. As such, the failure to address the presence of personal identifiable information, and civilian privacy concerns in general, can have far reaching consequences for both the public and the department. To mitigate these risks, the TRULEO application protects civilian privacy by not conducting facial recognition, object identification, motion detection, or voice identification on civilians. Moreover, the TRULEO application employs the following efficient and effective solutions for safeguarding civilian privacy while maintaining the utility of BWC video.

- Automated redaction - Advanced algorithms identify and obscure personal identifiable information in BWC video. This tool blurs faces and license plates, redacts information from transcripts and summaries, and conceals other identifiable data, ensuring that sensitive information is not inadvertently exposed.
- Access and monitoring controls - Strict access controls limit who can view, edit, copy, store, or share sensitive information. The department's BWC video management system, the TRULEO application, and other department computer systems maintain an

audit trail of all logins and transactions conducted to ensure full compliance with these guidelines.

- Data encryption - Strong encryption protocols are utilized during data transfers and within the application to ensure that only authorized personnel can access sensitive information.
- Data minimization - By limiting the amount of data collected and the duration of its storage, the risk of unauthorized access or disclosure of sensitive information is significantly reduced.
- Restricted search capabilities - Restricting smart search functionality to a single call transcript provides a safeguard against biased-based policing or other discriminatory practices such as the profiling, surveillance, targeting, or harassment of an individual or group. It also prevents the aggregation of sensitive information which can be used to establish patterns or practices in civilian behaviors.

Legal Considerations

The department is required by law to disclose certain information and material related to criminal and civil proceedings. As such, members of the department should only share BWC videos or data stored in the TRULEO application with authorized members of the department, the respective district attorney's office, United States Attorney's Office, or special prosecutor. Members of the department should not share BWC videos or data stored in the TRULEO application with any other external stakeholder.

Any request received from another entity, to include the receipt of a formal public records request or subpoena, for BWC video or data stored in the TRULEO application should be immediately referred to for appropriate follow-up.

Confidentiality

All BWC related hardware, software, audio and video recordings, analysis, reports, comments, notes, or summaries made or stored within the TRULEO application, irrespective of the content, are considered criminal justice records and are at all times the confidential property of the department. Other than providing copies of BWC video to members of the department for official purposes (e.g., arrest processing, ongoing criminal investigation, etc.) or to prosecutors as established by department policy and disclosure procedures, members of the department may not photograph, record, copy, edit, publish, share, or disseminate any audio or video recording, image, or data stored in the department's BWC video management system or the TRULEO application without the prior written authorization of [REDACTED]. The department's BWC video management system, the TRULEO application, and other department computer systems maintain an audit trail of all access and transactions conducted to ensure full compliance with these guidelines.

Data Retention

Regardless of the evidence preservation period setting for any BWC video in the department's BWC video management system, the TRULEO application's data retention policy is sixty days, after which time all data stored in the TRULEO application is automatically deleted. Any BWC video that is marked restricted (or "locked down" etc.) or is removed/deleted from the department's BWC video management system for any reason will not be analyzed or otherwise accessible through the TRULEO application. Any BWC video that was previously analyzed and accessible through the TRULEO application that is subsequently marked restricted (or "locked down" etc.) or is removed/deleted from the department's BWC video management system will no longer be

accessible through the TRULEO application and any data associated with that BWC video will be automatically deleted.

Computer Use and Monitoring Notice

All members of the department are advised that department computer systems and equipment are intended for the purposes of conducting official department business only. Use of department computer systems for personal or non-department business matters is strictly prohibited and individuals who are found in violation of this policy are notified that they may be subject to disciplinary action.

In addition, use of department computer systems to disseminate derogatory or discriminatory material is strictly prohibited. All members of the department are hereby notified that the department reserves and will exercise the right to review, intercept, access, and disclose all material on the department's computer systems at any time, including email communications, with or without notice to the member of the department concerned.

All members of the department are required to maintain strict confidentiality of any information accessed, created, received, stored, disclosed, or otherwise maintained during the course of duty. These guidelines also apply to the oral or electronic transmission of information contained in any department computer system directly accessed by members of the department, as well as members of the department who, intentionally or not, allow third parties to access information. It is the "logged on" member's responsibility to prevent other persons from recording or transcribing information for the purposes of unauthorized use (e.g., taking a photograph or recording a video of a confidential BWC video). Members of the department may be held accountable when, due to

their failure to safeguard sensitive information, a third party gains access. This includes unauthorized access by other members of the department.

These policies are established to ensure that users of department computer systems and equipment maintain the highest standards of professionalism and integrity. Members of the department who fail to adhere to these guidelines may be subject to disciplinary, civil, and/or criminal action.

Integrity Controls and Reporting Misconduct

A member of the department who observes, or becomes aware of corruption or serious misconduct, or receives an allegation or complaint of corruption or serious misconduct involving a member of the department, has the responsibility to promptly report such information directly to [REDACTED]. All members of the department have an absolute duty to report corruption or serious misconduct, or allegations or complaints of corruption or serious misconduct, of which they become aware. This includes acts of corruption or serious misconduct identified by a member of the department during a BWC video review. Failure to report corruption or serious misconduct, or an allegation or complaint of such an act is, in itself, an offense of serious misconduct and will be treated as such when uncovered during an investigation.

RELATED PROCEDURES

This section is intended for administrators to list references to procedures or other relevant department materials needed to fully understand and effectively execute this policy. Examples may include BWC program guidelines, referrals for training, records management system guidelines, etc.