

# Background

In its first year the Community Board on Public Safety CBPS, after conducting an extensive discovery phase with the Stanford community, issued its <u>First Progress Report</u> (First Report). That report enumerates eight principles for improving public safety. Each principle was accompanied by a set of proposed recommendations. The CBPS has since continued its effort to reimagine public safety on the Stanford campus. The next step as documented in the First Report was for the CBPS to

engage a consultant that specializes in implementing changes in public safety and policing operations to assist in a) comprehensively understanding the community implications of the Board's principles and proposed recommendations, b) to provide guidance on the viability of the proposed recommendations, modifications and c) to assist in developing an implementation plan. To assist in this effort, CBPS engaged The Riseling Group (TRG) (see Appendix A).<sup>1</sup>

#### Relationships with Santa Clara County and the City of Palo Alto



Stanford falls under the jurisdiction of the Santa Clara County Sheriff's Office.



Memorandum of Understanding (MOU) with the county, SUDPS is permitted to act in a law enforcement capacity on Stanford lands.



Stanford contracts its law enforcement dispatch services from the City of Palo Alto subject to the terms of another MOU.

It is important to remind the Stanford community of the complicated context within which law enforcement services are provided on the Stanford campus. The lack of autonomy Stanford has in delivering law enforcement services complicates the options and timing for potential action or solutions. Much of Stanford University land is situated in unincorporated Santa Clara County. This means it is not within any city or municipality. As such,

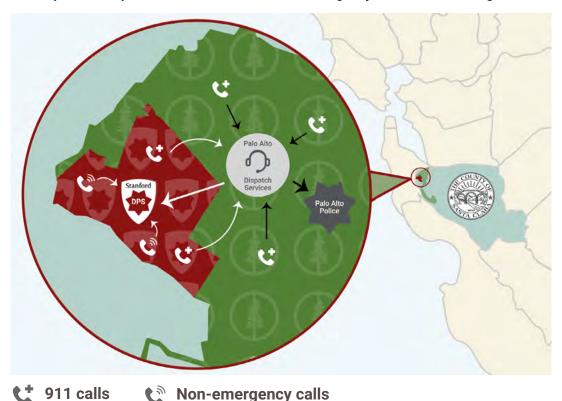
Stanford falls under the jurisdiction of the Santa Clara County Sheriff's Office (SCCSO). Absent an agreement with the county, law enforcement on the campus would be at the discretion of the SCCSO — that is the County Sheriff's Office would provide services to the Stanford campus subject to its assessment of the needs of the campus and further subject to resources available in light of other county obligations.

<sup>&</sup>lt;sup>1</sup> As a reminder, the charge to the CBPS from the President includes serving "in an advisory capacity to the President, Vice President and General Counsel, and the Chief of Police for the purpose of reviewing the practices, policies, procedures, and culture of the Department of Public Safety, and making policy, practices, training and other appropriate recommendations, where appropriate." TRG has contributed valuable insights that have been helpful to the work of CBPS, but as stated in the First Report, "while the Board is seeking expert advice and guidance, the ultimate recommendations will continue to be made by the Board, the people with deep knowledge of the Stanford community."

However, under a Memorandum of Understanding (MOU) with the county, the Stanford University Department of Public Safety (SUDPS) is permitted to act in a law enforcement capacity on Stanford lands based on Stanford's funding of services performed by SUDPS. This gives Stanford somewhat greater control over its law enforcement structure and operation. But any proposed changes in law enforcement must comply with the MOU, the Stanford 2000 General Use Permit,

and the General Orders between Santa Clara County and Stanford. Additionally, Stanford contracts its law enforcement dispatch services from the City of Palo Alto subject to the terms of another MOU. If necessary to accomplish the goals outlined by the Board and adopted by the President, the documents with Santa Clara County and the MOU with the City of Palo Alto would need to be amended to permit any actions inconsistent with the current documents.

PAPD receives all 911 calls, not DPS. PAPD dispatches the 911 calls to sworn DPS officers. DPS Department Operations Center receives non-emergency calls. Calls are triaged 24/7.



### Change Management Guidance from

#### **TRG**

TRG provided critical guidance regarding (a) the implementation, (b) pacing, and (c) change management efforts that would be necessary to address the principles and accompanying recommendations. Based on TRG's expertise in working with many other institutions, including higher education institutions, **TRG** characterized **CBPS** the principles recommendations as "ambitious". As such, the amount of time required to analyze the community implications of the broad array of recommended changes will extend beyond the annual reporting period for this Second Annual Report of the CBPS (Second Report).

Additionally, TRG cautions that the type of culture change associated with the range of sweeping changes outlined in the principles in the First Report must be managed in a thoughtful, methodical, coordinated, and strategic manner. TRG points out that the 8 principles and recommendations, if implemented, would lead to substantial change. However, attempting to address all of them simultaneously would likely result in a change overload that could undermine the potential success of some or all the principles. Therefore, as the community moves forward with these recommendations the CBPS will rely on both the guidance of TRG and the Board's knowledge of the community to guide recommendations on how best to proceed.

# **Executive Summary**

#### Holistic Public Safety Leadership

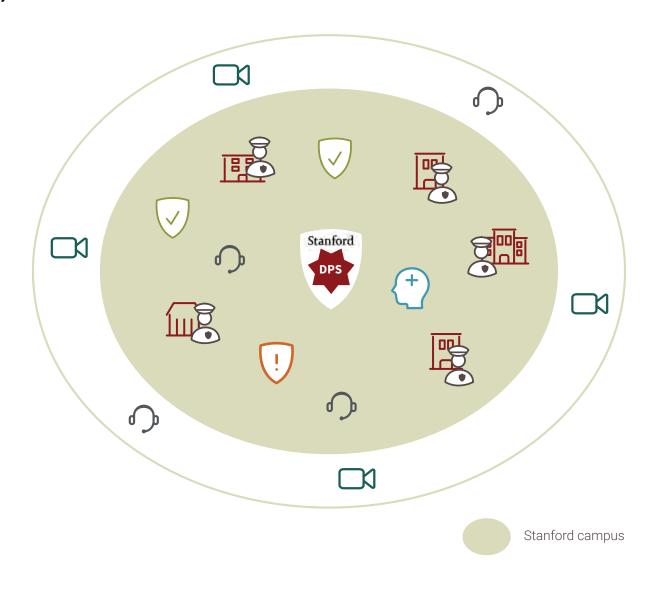
As CBPS's work has revealed, public safety concerns on campus extend far beyond the more traditional law enforcement functions performed by SUDPS. It includes areas such as mental health crisis management, access control, camera technology, emergency management, threat assessment, contract security, dispatch centers, monitoring centers, victim services, and infrastructure security. At Stanford, while all these services are interconnected, their management is distributed across multiple organizations within the institution, and some outside of Stanford. TRG points out that Stanford would benefit from a senior leadership position with responsibility for administratively connecting these many facets of public safety. This would allow for more seamless coordination of interrelated activities and, consequently, a more holistic approach to the broader areas of "public safety". A single leader empowered to bring a collective and strategic view to all components of public safety can significantly reduce the risk that anything falls in a gap between departments-a significant risk at this point.

The CBPS recognizes that a change of this nature is not a minor undertaking and would require a reorganization affecting multiple units. Implementation of this kind of change process, if deemed appropriate, could take considerable time to effectuate depending on the structure. For example, a single leader approach could require a significant reorganization and the reallocation of existing resources, but could also result in the clearest lines of authority. On the other hand, an approach that charges someone with the authority to coordinate distributed resources would likely be more efficient to implement, but could result in more opaque lines of authority. In the end, the CBPS acknowledges the complications with this sort of change and is more focused on the outcome - effective coordination of broad public safety resources – than with the approach. University leadership would need to assess the various potential approaches to achieving the desired outcome. Although the CBPS agrees with the wisdom of the consolidation approach, the recommendations below do not depend on this model being in place. CBPS, however, does strongly urge a more coordinated and integrated approach to public safety than the university currently has—whether that be under one person, a coordinated group of leaders, or some other approach.

#### Steps to Take in the Next 12 Months

For the initial phase of implementation, we will need to find common threads that tie multiple principles to achieve results most efficiently and effectively. More specifically, the reports on each principle contain a host of recommendations, ideas, and potential paths to explore. Enacting any of the principles in full will take a considerable amount of work and, in some cases, resources. To aid implementation, TRG has attempted to cull items from each principle for first steps as indicated below. TRG recognizes these selections were made for foundational purposes and with an eye towards things that could be accomplished within the ensuing 12 months, thereby positioning Stanford for the next round of implementation that would take place in the following 12 months.

#### Public safety concerns on campus extend far beyond the more traditional law enforcement functions performed by SUDPS.





**SUDPS** 



Mental health crisis management



Emergency management, threat assessment



Third party contractors (APEX, Allied Universal and Securitas, Treeline,

Associates) who are managed by multiple organizations (CAPS, local building managers, IT Services, LBRE, R&DE, VPSA) on campus.



Services such as dispatch centers (PAPD), monitoring centers, victim services.



Infrastructure security camera and camera technology



Public safety organizations

#### Common foundational steps needed to implement Principles 1, 3, and 8

There are a number of steps necessary for the full implementation of Principles 1, 3, and 8, and the full listing can be found at pages 8 through 18, however, these principles cannot be effectively addressed without some common enabling steps. Those steps include:

#### 1. Data Tracking Capability

Data tracking appears as an issue in multiple principles. We suggest the campus begin by hiring a data specialist who can work with SUDPS to resolve the data challenges. Without this capability it will be nearly impossible to analyze deployment patterns and other relevant information required to understand the current state and adequately plan for the reimagined future state.

#### 2. Enhanced Data Entry

Even though it entails more work, it is essential that SUDPS employees input all data in both the county system and the Stanford system. Doing so will provide Stanford with access to the information that will fuel the data pipeline necessary to allow a data analyst to have the tracking capability to supply SUDPS with the information critical to develop the systems needed to implement all the recommendations.

#### **Enhancing Non-Sworn Resources**

If the use of armed law enforcement is to be reduced, then an alternative must be available. The use of Community Service Officers (CSO) and Public Service Officers (PSO) within SUDPS would work well to reduce the reliance on sworn officers for work that does not require someone with a badge and a gun. However, the number of CSOs has been reduced over the years, and Stanford should consider supplementing the cadre of CSOs.

#### 4. Dispatching Capabilities

As addressed more fully in the discussion Principle 3 below, to implement any sort of staffing and response model that reduces the dependency on sworn officers for non-emergency issues will require a dispatch system that relies on a greater degree of independence from other law enforcement agencies. However, because of the complex infrastructure and existing relationships developing a Stanford-centric dispatching system will require both time and cooperation from other agencies. Therefore, embarking on such an effort will necessitate a significant amount of lead time such that the process will need to begin now to have an opportunity for implementation more than a year down the road.

#### Utilizing available external mental health resources

Having trained mental health professionals responding to people in distress is the thrust of Principle 2. To have police withdraw from calls for service for a mental health crisis, a professional, competent alternative must be consistently provided. Currently Santa Clara County and the City of Palo Alto each operate alternatives to police response to mental health calls. These mental health response teams comprised of mental health crisis experts are currently deployed in the county. Stanford should explore contracts to prioritize access to these resources in the short term while the Mental Health Working Group and other mental health professionals on campus assess the propriety of developing a sustainable cost-effective opportunity for Stanford to develop its own mental health crisis response team.

#### Create a common standard for contract security services

Stanford would greatly benefit from universally applied principles, provisions, requirements, and expectations for all entities that provide contract security services.

- 1. The university should limit the number of private security companies with which schools and units are permitted to contract. This will promote consistency and streamline the ability to manage and coordinate engagement with these organizations.
- 2. A master contract should be enacted with all private security companies. Currently each company has separate contracts with various university departments with separate expectations. Within the master agreement, items such as de-escalation and anti-bias training should be required. (See Principle 5 below.)

- The uniforms the security companies require their personnel to wear should be completely different from the SUDPS sworn or non-sworn uniforms to avoid the common and mistaken belief that private security staff are SUDPS employees.
- Each contract security company should be required to coordinate with SUDPS, and the contract should be shared with SUDPS. Each company should identify a lead person who will work closely with SUDPS.
- Each private company should have some manner for their on-duty personnel to be contacted (and possibly directed) by SUDPS in the event of a major emergency.
- Each private company should have a complaint process that is publicized to their student, staff and faculty customers. (See Principle 6 below) A report to the university should be made with the results of any complaint follow-up.

#### **Enhanced Training**

Although SUDPS currently meets all of training requirements established by the California Police Officers Standards and Training, additional training would, nonetheless, be beneficial including:

- Ensuring every member of SUDPS attends at least one training program in the areas of anti-bias, diversity, inclusion, equity, procedural justice, or cultural competency annually.
- Ensuring the sworn officers, CSOs, and PSOs attend at least one training program a year on de-escalation techniques and skills.
- Infusing anti-bias, cultural competency, inclusion, and de-escalation practices into the promotional processes in SUDPS.
- 4. Completion of training recommended as a result of the January 28, 2023 SUDPS traffic stop incident.

## Addressing Complaints and Prioritizing Transparency

- The website should have complaint and compliment features (buttons) that enable a person to report good and the problematic incidents easily to the department for appropriate follow-up.
- 2. Report aggregate data on complaints in a dashboard function so the public can easily obtain the information.
- 3. SUDPS should conduct periodic community surveys.
- 4. SUDPS should consider an Alternative Dispute Resolution process, where appropriate.

### **Implementation Recommendations**

At the request of the Board, TRG prepared a detailed report analyzing each of the principles developed by the Board for the First Report. Below is a detailed summary of the current state on the Stanford campus for the areas covered by each of the principles, along with recommendations for how to implement each of the recommendations.

### Principle 1

Armed policing, particularly of student-centered areas of the community, should be reduced to the greatest extent possible; and more generally, armed policing should be used to the lowest extent appropriate for the circumstances.

### Principle 3

There should be tracking of the various types of public safety calls to facilitate review.

As the CBPS performed its analysis of the implementation of the principles and recommendations for Principles 1 and 3, it became apparent that these two principles are sufficiently linked that it is most effective to discuss the development of the approaches to address them in tandem. Additionally, to understand the board's consideration of these principles it is important to ensure clarity regarding what is meant by armed policing. As used in Principle 1, armed policing means sworn officers under the jurisdiction of the Santa Clara County Sheriff's Office. This means the SUDPS, and does not include non-sworn officers like Community Service Officers or Public Service Officers (described below) who do not carry firearms or other police equipment. It also does not include security services addressed in Principle 4.

#### Current Policing Deployment Structure

SUDPS currently maintains a 24-hour, seven days a week sworn patrol department that is deputized by the Santa Clara County Sheriff's Office. The staffing level for each shift is generally three to four officers. However, due to staffing shortages, patrol staffing most often consists of two to three sworn officers with a minimum staffing level of two. As needed, non-sworn Public Safety Officers (PSO) perform a variety of public safety services (traffic control, patrolling for suspicious behavior, reporting hazardous conditions, parking enforcement, etc.). Also, when needed, non-sworn CSOs support SUDPS public safety functions by serving as lead security officers (processing evidence, first responder for certain emergencies, etc.) and providing direction and training to other employees performing security duties and coordinating their activities.

#### **Current Data Reporting**

SUDPS records its activities utilizing multiple electronic data platforms.

- Microsoft Excel and Word systems are used for officer daily activity reports, police shift watch logs and Department Operations Call-Center activity logs.
- SUDPS has purchased RIMS, a sophisticated public safety records and computer aided dispatching system, however due to restrictions imposed by the Santa Clara County Sheriff's Office only the records management component is being utilized for police report related information.
- Officer or department-initiated activities in longform reports such as: field interviews, arrest data, and citations.

#### **Emergency Dispatching**

The Palo Alto Police Department (PAPD) provides a 911 communications center that receives both emergency and non-emergency calls. However, under a Memorandum of Understanding between the two organizations, Palo Alto communications dispatchers are hired and trained based on processes and procedures designed to serve the public safety needs of the general community of Palo Alto and do not accommodate any special or unique needs of Stanford. For example, PAPD dispatch services are limited to sworn officers. PAPD is not trained to triage and dispatch non-emergency calls that are frequently made by the Stanford community – it does not dispatch non-sworn staff like CSOs or PSOs.

#### Non-Emergency Dispatching

For non-emergency calls SUDPS maintains its own Department Operations Center (DOC) through which such calls are triaged 24 hours, seven days a week. The DOC, however, does not have access to all law enforcement information systems its sworn officers may need on particular calls.

# Proposed Deployment Approach - Strategically Deployed Policing Combined with Differential Public Safety Response

The CBPS acknowledges that there is not a monolithic view among the various communities on campus regarding the desire to engage with sworn-armed police officers. Therefore, any approach must take into account the unique needs of different parts of the Stanford community. To accomplish this the CBPS recommends that Stanford adopt a principle known as Strategic Deployed Policing (SDP). Through the SDP model different types of personnel could be deployed to different parts of campus. For example, if consistent with safety profiles, unarmed PSOs could be the primary source of patrol in student residence areas and sworn officers could be the primary source of patrols in the faculty housing areas. Through this approach SUDPS would re-align its policing and public safety patrol strategies with more collaborative crime prevention and community response strategies such as Differential Public Safety Response (DPR).

DPR is a set of alternative methods to the traditional field response to non-emergency requests for police and public safety services. DPR specifically details the established process through which calls are to be expedited by sworn officers, directed to non-sworn officers, or through self-reporting options, and which calls are to be dispatched to alternative community service entities (e.g., Student Affairs, R&DE, Student Health, Counseling Services, Facilities, Contract Security, etc.). Key to this SDP/DPR approach would be data-driven policing strategies that would place both sworn and non-sworn personnel where they need to be (while leaving the risks of over-policing and bias largely behind), and calling public safety services based on a consistent and structured response protocol.

Additionally, and more specifically, to implement the SDP and DPR approaches the CBPS recommends certain proactive, reactive, and parallel strategies as outlined below. It should be noted that the approaches below are a high-level summary:

#### **Proactive**

- Establish a formal crime and incident analysis function and position. This would be a new position responsible for collecting, analyzing, and mapping crime and incident data; monitoring crime and incident trends; assessing special event activities that often drive/influence crime and other problems on college campuses (i.e., athletics, controversial speakers, dignitary visits, protests/demonstrations, etc.); and performing statistical research in support of policing and public safety operations. To ensure independence and accountability, if permitted by the county this position would report to SUDPS and also have a joint reporting or dotted line relationship with another organization on campus.
- Use of lower touch, non-enforcement policing strategies. These strategies can enhance crime deterrence, and at the same time reduce perceived community harm.
  - » Simple visible presence alterations, such as riding bicycles within strategically selected areas or increasing meet-and-greet foot patrols can have an important deterrent effect.
  - » Patrolling objectives should <u>not</u> be centered around the enforcement of laws, rules, regulations, or making arrests. Instead, problem-solving and deterring or preventing

crime should be at the forefront of daily goals and objectives.

When community members see SUDPS personnel following consistent, non-enforcement strategies like those above, they tend to perceive the guardian aspect of their presence rather than view it as intrusive and intimidating.

#### Reactive

Sworn and non-sworn SUDPS personnel should be dispatched to calls for service based on established priorities and criteria intended to match the response to the nature of the incident. For example, a call for service a prioritization system at SUDPS could include:

- Priority 1: Emergency call requiring immediate response and there is reason to believe that an immediate threat to life or serious physical injuries may occur or an immediate and substantial risk of major property loss or damage exists.
- Priority 2: Crimes in progress or active incidents that present no significant threat of serious physical injury or major property damage and that require an immediate response for the apprehension of suspects or timely gathering of evidence.
- Priority 3: Immediate response is not required but there exists potential that physical evidence and/ or suspect information would most likely lead to an apprehension of a suspect.<sup>2</sup>
- Priority 4: Request for service where the responder's primary function will be fact-finding, reporting or rendering assistance.
- Priority 5: Request for service in which no response is needed and the caller can be referred to online reporting or self-service options (e.g., walk-in, telephonic, etc.).

Priorities 1, 2, and 3 require a sworn officer response. Priority 4 may make appropriate the use of a SUDPS non-sworn CSO or PSO staff for response options when available.

#### **Additional Staffing**

#### **Dispatch**

To effectively implement the Priority 1 through 5 dispatching system would require either retraining of PAPD dispatch staff to triage the Stanford-specific priorities, or a dedicated Stanford University dispatcher position that is hired and trained specifically in triaging, prioritizing, and dispatching the full array of public safety resources for the Stanford community.

#### **PSO / CSO Positions**

To achieve adequate staffing to address the nonsworn responsibilities called for by this approach would require hiring of some number of additional PSO and CSO positions. Should SUDPS and the university consider hiring for these positions, taking into account the goals of the IDEAL (Inclusion, Diversity, Equity and Access in Learning Environment) Initiative would be an important consideration.

#### Other Factors

To make CSO and PSO employees appear less threatening and more inviting, different uniforms should be considered. The uniforms worn by sworn officers is dictated by the Santa Clara County Sheriff's Office and, therefore, Stanford does not have the authority to change this use. The same is not true for CSO and PSO positions. Non-traditional and inviting type of dress for non-sworn personnel should be adopted that clearly distinguishes them from sworn personnel.

### Principle 2

Responses to mental health crises on campus should generally be handled by mental health professionals.

#### **Current Response Process**

Many mental health crises on campus are currently

handled by non-mental health professionals. Firstline responders to most student mental health crises on campus are staff members from the Office of

<sup>&</sup>lt;sup>2</sup> Currently, the Santa Clara Sheriff's Office requires SUDPS sworn personnel to investigate and/or document.

Residential Education (undergraduates) and the Graduate Life Office (graduates). This can occur with some frequency as almost all undergraduates and more than 80% of graduate students live in Stanford controlled housing. While these employees perform this function admirably, many are poorly equipped to handle the number and severity of crises they encounter.

During business hours, CAPS provides immediate evaluation to students presenting at or brought to its center. This includes writing involuntary holds. When necessary, SUDPS transports students from CAPS to the Stanford Health Care Emergency Department. Additionally, a contracted service, ProtoCall, provides after-hours telephone mental health crisis line support to students who call for support. ProtoCall staff members can elevate crisis situations to on-call CAPS clinicians and/or SUDPS. An on-call CAPS clinician is also available after-hours for a phone consultation with campus staff and receiving medical facilities.

#### Challenges with Current Internal Process

Significant gaps exist in communication and coordination of responses between SUDPS and other university departments in addressing campus safety concerns. For example, Student Affairs staff shared a perception that they are at times required to engage in "crime-fighting" activities beyond their scope, and that they must ask for assistance from SUDPS when they feel these activities should be provided by SUDPS without a request. Some SUDPS personnel believe they are unwelcome in many spaces across campus and, as a result, have purposefully curtailed their level of engagement. Multiple campus partners also acknowledge their perception that SUDPS has reduced its level of engagement on campus over the past few years, perhaps in response to concerns about armed public safety presence.

Additionally, students and staff members expressed concerns about stigma and trauma related to a law enforcement transport. Stanford has tried contracting with a local EMS for transport but did not find this feasible due to (a) reimbursement/cost and safety concerns from ambulance personnel, and (b) requirements that patients be searched and handcuffed for ambulance transport ultimately resulted in many of the same concerns as with law enforcement transport.

#### Challenges with External Resources

Santa Clara County is attempting to rapidly expand mental health crisis response resources. However, these resources are not well coordinated with Stanford's current institutional efforts. Many individuals within the Stanford community involved in providing mental health services expressed concern about whether county resources could adequately meet Stanford's needs. These services are shared with all county residents and may not be available to the Stanford campus on an urgent basis when there is demand elsewhere. The current menu of services include:

- Mobile Crisis Response Team (MCRT) MCRT is available 8:00 a.m. to 8:00 p.m. Monday through Friday and can be activated by a call from a citizen, residential life staff or law enforcement. MCRT is a co-response unit two mental health professionals and public safety personnel. SUDPS coordinates when MCRT responds at Stanford. During a joint response with MCRT, SUDPS generally writes the mental health hold and provides transportation. A limiting feature is that CAPS staff cannot activate the MCRT, nor can it provide MCRT personnel with clinical information due to the policies and structure of the MCRT. Additionally, clinical information from the MCRT assessment cannot be shared back with CAPS due to privacy issues.
- Psychiatric Emergency Response Team (PERT) - Responds to more intense and higher-level situations and is a co-response with a mental health clinician and law enforcement. The PERT program is in development and is expanding.
- A Community Mobile Response Program is in development, and it will provide a community-based response without law enforcement to individuals experiencing chronic homelessness, mental illness, and other ongoing and less acute needs.

#### Proposed Approach

Create a Stanford crisis call center to allow mental health-related crisis calls to be appropriately triaged based on level of concern. Employees who staff the call center would receive comprehensive dispatcher training and engage in robust data collection to permit program evaluation. The crisis response could be categorized as follows:

#### Level 1

Immediate concern for student, staff and/or individual safety due to an individual experiencing a mental health crisis.

- SUDPS as primary response.
- Establish a written agreement with Santa Clara County to fund a Stanford PERT mental health team that responds in coordination with public safety when needed.

#### Level 2

Significant distress or concern; no response to Level 3 intervention; or directed by CAPS.

- Option 1 Utilize MCRT when available and when additional evaluation and assessment is needed.
  - » Discuss developing an information-sharing agreement with Santa Clara County and Stanford when students are transported and evaluated. Provide funding to Santa Clara County to hire and staff Stanford focused MCRT teams.<sup>3</sup>

- Option 2 Create a response team for the hours of 8:00 a.m. - 10:00 p.m. from CAPS crisis team members. These team members could support other CAPS functions such as in-center crisis visits and high-risk patient follow-up. CAPS crisis clinicians should not respond to non-student calls.
  - » After 10 p.m. SUDPS in conjunction with Santa Clara County would respond with MCRT.

#### Level 3

Episodes of student concern or distress or community members in need. No concern for immediate student, staff, or individual safety.

expand training and staffing within residence and graduate student life to have non-clinical crisis response support staff/counselors on-site responding to a range of student issues. Hire staff members with social work backgrounds and provide mental health crisis training. Social work trained staff can support immediate de-escalation and referral to appropriate resources. Provide direct access to an on-call CAPS clinicians for consultation and coordination of care.

### Principle 4

All security services operating on campus should meet minimum standards and be coordinated.

#### **Current Process**

Schools and business units have the authority to contract with security functions provided they contract for such services through the procurement office. Functioning in this fractured manner, and with contract security personnel engaging directly with the community, places Stanford University at a higher risk that (1) any negative interactions between contract security and members of the community will be incorrectly seen as reflecting poorly on the performance of SUDPS and (2) these interactions may be handled in an inconsistent manner and in a manner that does not comport with institutional values. Consequently, the current independent and

uncoordinated structure and decision-making process can negatively impact the broader campus security program.

#### **Proposed Approach**

The overall structure of campus security services would benefit from centralized coordination. This more strategic approach would increase efficiency, and allow the contracted security services to be a multiplying factor for the work done by SUDPS. As part of this strategic approach Stanford would need to clearly define the purpose of the contracted services, and support a commitment to create an environment that

<sup>&</sup>lt;sup>3</sup> Santa Clara County is partnering with San Jose State University to fund PERT mental health positions to respond with their public safety. In addition, the City of Palo Alto has recently partnered with SCC to add a PERT clinician to the Palo Alto Police Department.

raises the level of expectations for and accountability of this key component of Stanford's integrated public safety system. The key features of the development of this component of the integrated public safety system are:

- Staffing Contracts must comply with relevant portions of the IDEAL Initiative. The contractual relationships must be infused with the purpose of their mission on-campus and require a specific staffing vision and strategy that supports recruitment and retention goals.
- Training All contractors must be required to have Stanford University approved training or Universitydeveloped training of all staff in anti-bias, deescalation, and DEI areas, including refresher training.
- Culture Develop a strong, consistent, and

intentional culture among contract security providers by:

- Reducing the number of transactional relationships with vendors and increasing trusted partnerships to form the basis for developing a more integrative approach to using contract security.
- Shifting to a coordinated uniform (that does not have the appearance of a traditional law enforcement uniform) that is clearly differentiated from SUDPS colors or the colors of other local police type agencies. This would have the dual benefit of creating a unifying visual image across all contract security firms, and reducing the risk that contract security personnel will be confused with members of SUDPS.

### Principle 5

#### Anti-bias and de-escalation education should be provided for all security services as well as for the community.

#### **Current Process**

TRG performed a comprehensive review of the anti-bias and de-escalation training and found the following:

- SUDPS either meets or exceeds training requirements established by the California Commission on Police Officer Standards and Training (CA POST), including:
  - Required 16 hours of cultural diversity (entrylevel officers),
  - Required 15 hours of engaging with differently abled (entry-level officers)
  - Required 8 hours every 5 years of mandatory training for racial and cultural diversity and antiracial profiling for non-entry-level officers
  - Required 8 hours every 5 years of mandatory training de-escalation and mental health training
- SUDPS requires all benefits eligible officers to complete the IDEAL Learning Journey offered by the University

There is currently no standard training requirement

for contract security forces, and there is no anti-bias training program for the community.

#### **Proposed Approach**

SUDPS elevate the importance of anti-bias training to be on par with tactical and firearms training, and ensure that training highlights the connections between bias and use of force. In furtherance of this effort, in addition to the training addressed above, TRG recommends that SUDPS officers also complete the following training:

- Annual comprehensive DEI and anti-bias education for SUDPS personnel (sworn and non-sworn) (this would exceed CA POST requirements).
- Crisis Intervention Training for all sworn officers (40-hour course), with refresher training every other year.
- Mental health awareness, crisis intervention and deescalation training of equal importance with tactical and firearms training. To highlight the importance of this training, the training course should include data about the number of mental health related calls annually compared to the number of in which force is used.

- Comprehensive mental health and de-escalation education for SUDPS (sworn and non-sworn personnel) and private security service companies annually.
  - » Sworn personnel would learn physical deescalation techniques as well as verbal techniques. Non-sworn and security staff would be taught verbal skills and body positioning and language that helps with de-escalation.
- Interpersonal Communications and Tactics (ICAT) training offered by the Police Executive Research Forum (PERF) for all sworn officers, and train at least two SUDPS individuals as instructors in this area.

TRG also recommends that the following process changes be implemented:

- Infuse cultural competency, de-escalation, and mental health awareness into all promotional processes within SUDPS.
- Incorporate de-escalation principles in debriefings after an interaction and/or incident as a learning opportunity, and document the learning opportunity.
- Require that all SUDPS de-escalation training instructors are certified by CA POST.
- Incorporate DEI principles in debriefings after an interaction and/or incident as a learning opportunity. Document the learning opportunities.

 Infuse DEI, cultural competency, de-escalation, and interpersonal communication metrics into all (sworn and non-sworn) promotional processes, (questions, panels, exercises) within SUDPS.

Private security companies should be required to establish an accountability mechanism to document the training their staff receives and to report that to Stanford. The training, at a minimum, should include:

- SUDPS training for security groups on campus to be completed on an annual basis (unless significant turnover within the company requires more frequent sessions).
- DEI and de-escalation training.

#### Community

- Consider engaging in an anti-bias public information campaign for the Stanford community. An example from another institution is Not On Our Campus (https://www.niot.org/project/notonourcampus), a campaign which has been successfully incorporated at numerous universities.
- Consider creating a toolkit similar to what was done in Billings, MT. <a href="https://www.ktvq.com/news/local-news/be-kind-campaign-launched-to-pro-mote-goodwill-in-billings-in-stressful-times">https://www.ktvq.com/news/local-news/be-kind-campaign-launched-to-pro-mote-goodwill-in-billings-in-stressful-times</a>

### Principle 6

There should be a process for receiving feedback (positive or negative) on community interactions with police and private security, and a process for independent review of complaints.

#### **Current Process**

California law enforcement agencies are required to establish a procedure to investigate complaints. A written description of the procedures must be made available to the public. SUDPS complies with this law through the publication of General Order 14 (Complaints by Members of the Public) which is posted on its website. A complaint form is accessible on the department's website, however, neither the complaint form nor the website provides instructions on how to

submit the form or the SUDPS processes regarding the investigation and resolution of complaints. During the four-year period from 2018 to 2021 there were three complaints submitted and the investigation of all three investigations were found to be thorough, objective, and complete. There is no process or policy for the handling of commendations and general feedback involving SUDPS or its personnel, and there is no process for complaints or commendations for contracted security agencies.

#### **Proposed Approach**

The solicitation and receipt of feedback are essential, whether it be positive or adverse, as it not only provides valuable community insight, but allows SUDPS to identify successes and growth opportunities within its service and response strategies. In addition, welldeveloped complaint and feedback processes provide vital roles in maintaining the levels of transparency and accountability needed to foster trust and collaborative working relationships within the community. When considering feedback approaches, it is important to strive to ensure processes are designed to elicit high-quality and actionable responses. High-quality feedback is derived from the solicitation of information relating to specific objectives, such as community outreach and engagement, public safety support and services, or crime prevention and abatement efforts within segments of the community (e.g., residential, research, medical, or other areas within the campus community). Utilizing external resources yields the best opportunity for receiving this type of feedback. Through these resources information is gathered about community perceptions, misperceptions, concerns, and praise on issues involving law enforcement and public safety. Additionally, through TRG's research, law enforcement agencies, particularly within higher education, have found that given political sensitivity and varied sentiments regarding law enforcement, many community members desire feedback opportunities that are established through third-party, anonymous, and streamlined means. The elements listed below are intended to provide Stanford with targeted, high-quality, feedback, where possible, from external resources:

#### 1. Utilize Customer Satisfaction Surveys

Customer satisfaction surveys are a standard best practice by law enforcement and public safety agencies in the proactive solicitation of feedback concerning the services an agency provides its community, as well as visitors and guests. Progressive public safety agencies maintain a continuously active public safety community/ customer satisfaction survey link on their website. The results are often received by an external department or contracted company that independently assesses and reports on the feedback received. Within higher education, this survey is typically sent through campus email to a cross-section of the university community (e.g., a random 25% sampling of faculty, staff, and

students) in two- or four-year intervals.

#### 2. Conduct Hosted Events

Community-hosted events where people can engage in constructive conversations around complex issues are also a best practice, even though there is the potential for conflict in the forum. Nonetheless, such events are valuable in helping establish effective partnerships with the community and remain essential to the establishment of community policing initiatives.

#### 3. Expand Accessibility and Feedback Opportunities

SUDPS should make the complaint/feedback surveys, forms, and processes more accessible to the public by providing multiple options for submission, including feedback submitted anonymously. Submittal of the documents should be offered via hard copy, email, and online to include option(s) for those who desire to file anonymously. Periodic surveys and focused engagement sessions with special interest groups should also be considered.

#### 4. Develop an Alternative Dispute Resolution Program

An ADR program can serve as a type of diversion program for complaints that are minor, costly to investigate, unlikely to be sustained by more traditional investigative processes, or where a citizen is seeking to be "heard," not pursue punishment.

#### 5. Publicly Report Complaint and Feedback Data

Accessibility, transparency and accountability in public safety and law enforcement are fundamental to establishing and maintaining effective and collaborative relationships with the public. Therefore, SUDPS should provide data on these processes and the results on a periodic (annual, semi-annual, or quarterly basis).

#### 6. Obtain Feedback from Private Security Companies

Stanford should establish parallel or similar procedures for the solicitation, receipt, and handling of the various forms of feedback involving private contract security.

#### 7. Consider Independent Public Safety Advisory or **Oversight Process**

An independent police and public safety accountability board or group may be beneficial in improving community relations through greater transparency and accessibility. Such boards generally serve two functions:

Review policies, procedures, practices, and trainings and make recommendations when the board identifies possible improvements or blind spots, and work with campus leadership, the campus community, and the campus police department to identify, make recommendations on, and address issues involving the safety and quality of life of students, staff and faculty.

 Independently review investigation reports and make recommendations to the Chief of Police following investigations of complaints from the campus community or general public (also referred to as civilian complaints).

The CBPS already plays the role set forth in the first bullet point. The second bullet point could be performed by the CBPS or another institutional body. In any case, TRG strongly recommends that if Stanford is to proceed with the second bullet point that SUDPS retain full and

final authority, discretion and responsibility regarding the disposition or recommendations of an oversight or advisory board, including disciplinary determinations and whether to accept, reject or modify the board's recommendations.

#### 8. Consider Integration of an Independent Auditor

An Independent Police Auditor is a third-party contractor who conducts audits of investigations of complaints by members of the public; internal affairs investigations; all use-of-force investigations where a baton, chemical agent, TASER, less-lethal projectile, canine or firearm is used; and any other use-of-force investigation in which a subject's injuries required treatment beyond minor medical care in the field.

### Principle 7

The university should consider other possibilities for community involvement in the management of public safety in the Stanford community.

As the CBPS consulted with TRG on Principle 7, TRG advised that in light of the scope of the other seven principles it would be imprudent to proceed with the current Principle 7.

### Principle 8 —

The university should seek to capture data related to police interactions with the public in a way that better allows it to assess potential bias—data that would assist the ongoing work of SUDPS and the Board.

In addressing Principle 8, the CBPS with the guidance of TRG concluded that the following are needed:

- Vastly improved data collection related to police interactions with the public to aid in SUDPS and CBPS in the assessment of potential bias;
- The publication of the available data at regular intervals and to the fullest extent permitted by law and agreements with Santa Clara County;
- Adoption by SUDPS of a bias-free policing policy; and
- A process for developing accountability and corrective measures in the event any officer engages in contacts with the public that may be deemed to reflect bias.

#### **Current Data Process**

As described above, SUDPS captures Stanford public safety activities utilizing multiple electronic data platforms. SUDPS uses Microsoft Excel and Word programs for officers' daily activity reports, police shift logs, and DOC call center activity logs. SUDPS owns and maintains a sophisticated public safety records and computer-aided dispatching system called RIMS. However, due to legislative and Santa Clara County Sheriff's Office restrictions, it is not being fully utilized.

In the First Annual Report of the CBPS the anticipation of data from the then recently enacted Race and Identity Profiling Act (RIPA) was referenced. In general, this data is considered by TRG to be the most accurate manner

to receive quantitative and qualitative data of police interactions with the public. The RIPA documentation approach is a vetted, approved, and accepted method of receiving such data for review and analysis. Because SUDPS is granted its law enforcement authority from the Sheriff's Office (SCCSO) and the SUDPS deputy activity is consolidated with the non-SUDPS data from the SCCSO. Stanford is not able to obtain SUDPS/ Stanford campus specific RIPA data. Current law prevents the Stanford data from being disaggregated from that of SCCSO. This prevents both SUDPS and CBPS from using these data to assess any aspect of SUDPS policing.

In the absence of access to RIPA data, the potential data sources for analysis include data maintained by three agencies, SUDPS, Santa Clara County and PAPD. Complicating matters, access to these data may be limited depending upon the law, collective bargaining agreements, and established memorandum of agreements/understanding with the external agencies. Moreover, the structure of public safety data collection and storage makes this difficult as it is maintained both on paper and electronically. Finally, call and dispatch data are maintained in a PAPD system that is not compatible with SUDPS's records management system.

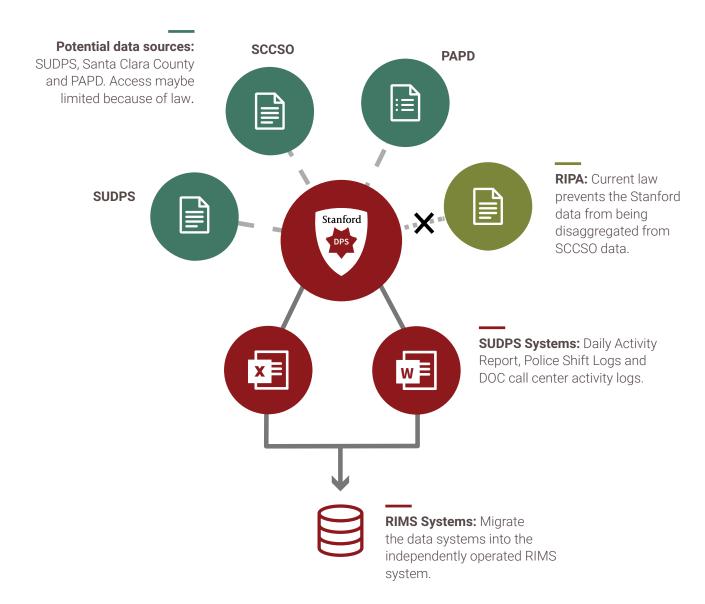
#### **Proposed Approach**

While the complications with and shortcomings of the current data collection and reporting systems create barriers that currently prevent the type of information gathering that would aid in determining potential bias, these obstacles must not be used as excuses that prevent our community from compiling and sharing in a transparent manner information and data that will allow this board, the Stanford community, and SUDPS to accurately evaluate the activities of law enforcement on our campus. Instead, the problematic current state of data gathering, and availability must serve to inspire Stanford to develop systems that are more befitting of the level of excellence the university pursues in other endeavors.

Toward this end, the following specific actions are recommended for the university to proactively approach monitoring potential bias-based policing and public safety administration and, thereby, improve SUDPS's transparency, trust, and engagement with the community.

- Establish a formal crime and incident analysis function and position (addressed in response to Principles 1 and 3 above).
- Fully implement the relevant features of SUDPS's independently operated RIMS system for gathering and reporting RIPA/Stop data. This system is not owned or controlled by the SCCSO and allows for the potential to use the system to integrate contracted security guard contacts (see response to Principle 4).
- Migrate all other SUDPS data systems (i.e., daily activity reports, watch logs, and DOC logs) into the RIMS system.
- Integrate the recommendations from the RIPA Advisory Board considered viable for the Stanford community. The RIPA Advisory Board is an external organization that releases an annual report that examines a wide range of issues related to racial and identity profiling, providing context and research to deepen stakeholders' understanding of the stop data collected under RIPA, including a "Recommendations and Best Practices".
- Revise SUDPS's coordination of RIMS database incident types to correspond with those used within the PAPD database.
- Develop policies applicable to all SUDPS personnel (sworn and non-sworn) reflecting the unique antibias and bias-free needs, desires, and services that the Stanford community expects, including both accountability and corrective measures. Such policies will provide transparency, promote integrity, instill trust, support a high-performance culture and lead to better decision-making. The CBPS should be consulted in this process.

#### **Data Collection Flow**



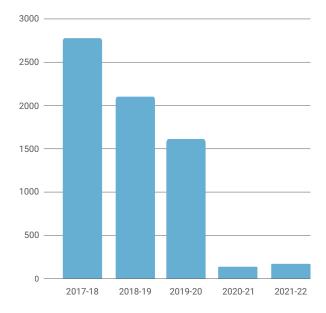
# Data Analysis

In the First Report the Board, after considerable analysis Stanford's with assistance of Institutional Research and Data Support unit concluded that, for a variety of reasons, the available data don't provide a full picture of SUDPS activity or definitive answers to the Board's questions of what is working well and what might be improved. The limitations were not the fault of SUDPS. The data and its methods of collection were not designed to meet the analysis goals of the Board. The Board had hoped access to RIPA data would assist in this analysis however, for the reasons outlined above, the data available for this report is no better than the data available for the First Report. Consequently, the

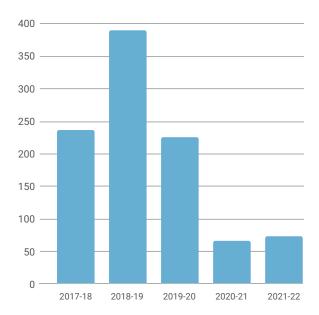
conclusion is the same as it was in the first report - namely, "In light of the inherent challenges presented by the data, the Board does not believe it can present definitive conclusions in the present progress report. Additionally, because the period subsequent to the First Report largely includes the period of campus disruption due to COVID-19, the numbers result in greater interpretational difficulties than did the numbers reviewed for the First Report. For example, the First Report included data for 2018, 2019 and 2020. In academic year 2017-18, 2018-19, and 2019-20 the number of citations issued by SUDPS was 2,651, 2,097 and 1,108, respectively. In academic yeas 2020-21 and 2021-22 the

number of citations was 80 and 86, respectively. Likewise, for the reported arrests for academic years 2017-18, 2018-19, and 2019-20 were 235, 388, and 224, respectively. The number of arrests for 2020-21 and 2021-22 was 65 and 72, respectively. Because of the small size of the numbers, it is difficult to make meaning of the demographic changes. Nonetheless, we note that citations for members of the Black community were down, but arrests were up, and citations for Hispanics were up and arrests were down. For the sake of transparency, we provided the information in Appendix B with the reminder that because of deficiencies in the data the Board draws no conclusions from it.

#### **Number of Citations Issued by SUDPS**



#### **Reported Arrests**



#### **SECTION V**

# **Next Steps**

The Board welcomes the opportunity to continue to discuss these recommendations with the university administration and to develop a plan to best move forward with implementation. The executive summary above outlines the actions the Board recommends over the course of the next year. During that time the Board will continue to engage with the community to assess needs and develop implementation plans. It is

only through this engagement—and an assessment of the help that can be gained from Santa Clara County Sheriff's Office, the City of Palo Alto, the Santa Clara Mobile Crisis Response Team, Psychiatric Emergency Response Team, etc.—that realistic timelines for future recommendations can be developed.

#### Appendix A

#### **Request for Proposal for Consultant**

With the assistance of Financial Management Services Division of the Office of the Vice President of Business Affairs, the CBPS conducted a thorough Request for Proposal (RFP) process through which, after considering many of the top consultants in the country, there was unanimous agreement to engage The Riseling Group (TRG).

TRG engaged in a comprehensive analysis of the documentation generated from the extensive educational phase engaged in by the CBPS in its first year as referenced in the First Report. That analysis included notes and minutes from meetings with various campus constituencies, including: the Office of the General Counsel, the leadership of Stanford University Department of Public Safety (SUDPS), Counseling and Psychological Services (CAPS), Student Affairs, the

Title IX/Equity and Access Office, student advocates for police reform, Abolish Stanford, a town hall for students and postdocs, and a separate town hall for faculty, staff, and community, as well as the minutes from the numerous CBPS meetings and brainstorming sessions during which there were robust discussions, debates, and collaborative conversations to share perspectives and formulate recommendations. TRG also engaged substantially and directly with campus stakeholders, including: CAPS, SUDPS, the Office of the General Counsel, Graduate Life Office, Associated Students of Stanford University, Graduate Student Council, Vice Provost of Student Affairs, and CBPS. Based on the information reviewed and TRG's expertise, the analysis provided important guidance for operationalizing and implementing recommendations.

#### Appendix B

#### **Field Interviews by Fiscal Year**



#### **Citations by Fiscal Year**



#### **Arrests by Fiscal Year**

