

Recommendations from the City of Grand Rapids Police Policy & Procedure Review Task Force

Introduction

In 2016, the City of Grand Rapids contracted with Dr. John Lamberth and Sheriff Jerry Clayton from “Lamberth Consulting” to conduct a comprehensive analysis of traffic stops conducted by the Grand Rapids Police Department. The analysis, which was completed in 2017, revealed statistical significant disparities in the stops and searches of certain minority groups. The study provided a series of recommendations to address these disparities, including the creation of a Task Force composed of community members and police.

Specifically, Recommendation #2 states:

Grand Rapids should immediately begin a comprehensive review of its policies and procedures to determine whether any of these administrative tools contribute to the over stopping of Black motorists.

This review should be conducted by a group that consists of the Chief, Command Staff representatives, other supervisory levels and officers as well as at least one external policing expert. In addition, this group should include one or more members of the Grand Rapids Community.

The Task Force was formed in October 2017 and identified six key areas of focus to meet the Lamberth recommendations.

1. Staffing and Deployment
2. Internal Affairs (Accountability)
3. Training
4. Youth Policy (this was added at the request of the police chief)
5. Community Policing and Crime Reduction
6. Recruiting and Hiring

Below is a list of the 38 recommendations the Task Force identified in the aforementioned areas. This is not the final report, which will be completed in October and provide details into the work and deliberations of the Task Force, as well as an assessment of the Police Department’s efforts to implement the recommendations outlined in President Obama’s Task Force on 21st Century Policing.

1. Staffing and Deployment

Recommendation 1.1: GRPD should conduct a comprehensive staffing and deployment analysis, including but not limited to the evaluation of the current Beat configuration, and an assessment of the current and future staffing needs (both sworn and civilian) of the Department based on service demands and the comprehensive adoption of community policing.

Recommendation 1.2: GRPD should develop policies that provide clear guidance to officers regarding their expected duties and responsibilities when deployed to proactive patrols and while participating in specific crime initiatives and responses.

Recommendation 1.3: Prior to the increasing sustained enforcement activities in a Beat or area and when it does not compromise officer safety, GRPD should conduct a public meeting in that impacted Beat or area, give the community notice of these activities, and identify expected outcomes.

Recommendation 1.4: Whenever GRPD initiates a new crime strategy or deploys additional enforcement resources, for a sustained period of time, to a Beat or specific area, GRPD should conduct a monthly evaluation – including a review of stop, search and arrests data – to identify if the activities are resulting in disparate effects by race.

Recommendation 1.5: As recommended in the Lamberth report, GRPD should immediately conduct an analysis of its 2016 stop data.

Recommendation 1.6: As recommended in the Lamberth report, GRPD should expand its stop data collection in the following areas (Lambert, p. 73):

- (A) Accurately record race and ethnicity of motorists;
- (B) Collect more data on post stop activity, e.g. were motorists asked to exit their vehicles and/or were they handcuffed;
- (C) Revise the type of stop data to be more inclusive of the type of moving or equipment violations recorded; and
- (D) When the motorist, passenger or vehicle is searched, record the results of these searches.

Recommendations 1.7: GRPD should conduct regular analyses of its stop data – both at the aggregate and individual officers level to ensure deployment patterns and crime strategies are not resulting in racially disparate effects.

Recommendation 1.8: GRPD should partner with a local academic institution to assist with its ongoing stop-data collection and analysis to ensure all analysis is based on credible methodologies and benchmarks.

Recommendation 1.9: GRPD should participate in the “Police Open Data Initiative” facilitated by the Police Foundation and post all stop and search data and analysis publicly.

2. Internal Affairs

Recommendation 2.1: GRPD should add clear prohibitions against conflicts of interests to existing policies.

Recommendation 2.2: Complaint Filing Procedure E.2 should be modified to require that police personnel who are notified by a community member that they want to file a complaint against a member must direct that complaint to Internal Affairs or an on-duty supervisor to initiate the complaint process.

Note: The current policy refers community members to the Internal Affairs Unit, which is only open during normal business hours. This may cause the department to lose an opportunity to learn about potentially inappropriate behavior or deficient performance. It may also interfere with a supervisor’s ability to resolve the incident as appropriate and/or impact the ability of the department to gather relevant information that may prove useful toward exonerating or sustaining a complaint.

Recommendation 2.3: Complaint Filing Procedure E.2 should be revised to allow an on-duty supervisor to complete the Complaint Intake Report and, when necessary, advise Internal Affairs of any situation that requires an IA response.

Recommendation 2.4: GRPD should develop and widely distribute across the community a “Complaint Brochure” that describes the complaint and appeal processes in a clear, concise, and accessible manner.

Recommendation 2.5: GRPD should conduct an analysis of community complaints for the past 5 years to identify any patterns and trends.

Recommendation 2.6: GRPD should complete and publish a complaint summary report on an annual basis that provides a comprehensive report and analysis of the aggregate data on complaint patterns and trends.

Recommendation 2.7: GRPD should expand its Early Intervention System (EIS) to include stop and search data.

3. Training

Recommendation 3.1: GRPD should conduct an annual training needs assessment to identify continual professional training courses that includes consideration of information (and lessons learned) from community complaints and feedback, stop and search data analysis, uses of force, and assaults against officers.

Recommendation 3.2: GRPD should include community members and relevant stakeholder groups in the development and presentation of officer training.

Recommendation 3.3: GRPD should, in partnership with the community, develop and provide training on “cultural competency” with a focus on communities that have been historically disenfranchised by law enforcement, and typically have generational mistrust with the police. These groups include, but are not limited to, immigrants, LGBTQ, and communities of color.

4. Youth Policy

The recommendations below have been provided to the Task Force and GRPD for their consideration. The GRPD Youth policy has been completed by GRPD and adopted by the City Commission. Not all recommendations were adopted.

Recommendation 4.1: The policy should contain a statement that states:

- (A) A recognition that juveniles are still in the stage of developing and learning and may have already experienced trauma that is shaping their behavioral response.
- (B) The formal juvenile justice process is to be avoided unless clearly indicated by the juvenile’s behaviors and unless alternatives do not exist.
- (C) The least restrictive alternative is used to address the juvenile problems.
- (D) All juveniles are to be treated fairly regardless of race, gender, sexual orientation, ethnic and religious background, etc.

Recommendation 4.2: Prohibit the handcuffing of a child under the age of 12 unless exigent circumstances are present such as violent behavior, possession of a firearm, etc. It is important for officers to determine the context and situation when they handcuff a youth.

Recommendation 4.3: The policy should require supervisors respond to the scene whenever a minor 12 or under is handcuffed.

Recommendation 4.4: If a youth has been frisked or searched, officers shall notify the youth's parent or guardian. This notification should be made within 24 hours.

Recommendation 4.5: Policy should require officers receive cohesive training that enables officers to understand adolescent development; cultural differences among youth; mental health and trauma issues; and effective strategies for youth engagement, intervention and crisis response.

Recommendation 4.6: Clarification on how officers interact with youth, what levels of intervention they use, especially in school settings, and recognizing that police interactions can lead to trauma in children (trauma exposed children).

Recommendation 4.7: Referencing General Procedures Sec. 5, Line B, "Utilizing appropriate resources, such as CPS or DART." This needs stronger language than just "using."

- (A) GRPD should consider putting into place a strategy that focuses on chronic youth offenders, regardless of age. A community-team approach that involves Child Protective Services, Schools/Education/and PD. This strategy has been very effective in communities that face repeat offenders or chronic or habitual youth offenders.
- (B) Engagement and partnership with Child Protective Services is crucial. This has been a major lesson and practice as a result of the work of the National Alliance for Drug-Endangered Children.
- (C) Having CPS on the ground when children are involved in an arrest environment is a proactive intervention.

5. *Community Policing and Crime Reduction*

Recommendation 5.1: Recognizing that community policing works best when it is supported by elected leaders and is a subset of community-based governance; the Mayor and City Commission should adopt a Resolution that mandates community policing as the operating philosophy of the police department and require all city departments to contribute to enhance public safety through community collaboration.

Recommendation 5.2: GRPD should develop a citywide community policing plan that incorporates crime reduction strategies, community engagement and partnerships, and police department oversight.

Recommendation 5.3: GRPD should include community members in its CompStat process.

Recommendation 5.4: Develop a patrol strategy that allows Beat officers time to engage with the community in non-enforcement activities (e.g., foot and bicycle patrols).

Recommendation 5.5: Require Problem-Oriented Policing (POP) training to all sworn officers. This training teaches officers how to solve community problems in partnership with the community and through a mode that is comprehensive and evidence-based.

Recommendation 5.6: Incorporate the core principles of community policing - engagement, collaboration, problem-solving, and building trust and legitimacy in annual performance evaluations for all officers.

Recommendation 5.7: GRPD Beat officers should be required, and given the time, to initiate and complete at least one POP project on a quarterly basis.

Recommendation 5.8: GRPD should develop a specific POP incentive program(s) that recognizes and highlights GRPD staff - both sworn and civilian - in problem-solving with the community.

6. *Recruiting and Hiring*

Recommendation 6.1: The City and GRPD continue its recruitment outreach efforts with a specific focus on minority recruitment and retention.

Recommendation 6.2: The City and GRPD continue the “Intern” program and provide sufficient resources to increase participation.

Recommendation 6.3: The City continues to use community members as part of the interview process of applicants.

Recommendation 6.4: The City consider engaging in a national recruitment effort to increase the diversity pool and outreach efforts.